

September 20, 2021

Planning Consultation
Provincial Planning Policy Branch
Ministry of Municipal Affairs and Housing
777 Bay Street, 13th Floor
Toronto, ON M7A 2J3
(Submitted via Environmental Registry)

To whom it may concern,

Re: ERO 019-2346 A Proposed Approach to Update the Projection Methodology Guideline

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA welcomes the updating of the projection methodology guideline and applauds the initiative to bring it into alignment with the most recent planning policies. In support of that endeavor, we are pleased to provide comments on the proposed approach to update the projection methodology guidelines.

In preface to considering the questions posed in the proposal, OFA would like to provide some background context as to our overarching policies which help to inform our responses.

Firstly, we advocate for the concept of Distributed Economic Development. OFA understands that sound public investment in Ontario agriculture and rural communities will pay dividends and will ultimately improve Ontario's fiscal outlook by driving our economy forward. We are confident that any monies invested in rural Ontario will drive business development and the provincial economy along with job and housing opportunities for families.

Our advice to the provincial government is to invest specifically in natural gas, transportation, and broadband infrastructure, as well as rural schools and health care. OFA's campaign to secure these investments is called [Producing Prosperity in Ontario](#). Rural Ontario, driven by its agri-food industry, has the potential to grow food and generate jobs and economic opportunities. Ontario's economy has the most to gain by investing in what OFA sees as underperforming, or neglected regions of the province. Proper public investments in rural Ontario will jump-start farming, agri-businesses, and rural Ontario growth, and in turn, stimulate the entire Ontario economy.

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We urge the government to consider OFA's request for distributed economic development by stipulating in the projection methodology guidelines that by prioritizing increased access to rural broadband, municipalities can increase the number of residents working from home and running Primary sector agricultural businesses. By upgrading broadband access in rural areas, municipalities can help Ontarians generate greater numbers of Work-At-Home jobs or Primary sector agriculture jobs. By recognizing and supporting these jobs with updated broadband capacity, municipalities could greatly reduce the number of acres needed to accommodate new greenfield employment projections for settlement area expansions.

The second over-arching policy position that we would like to provide is that OFA believes that the Ontario government should designate all lands in Ontario that are outside of current urban boundaries as Greenbelt. OFA believes that policies of fixed, permanent urban boundaries for all settlement areas, conversion of urban intensification and greenfield development targets to mandatory requirements that are not open to appeal, and adoption of a broader, province-wide policy to distribute urban growth more uniformly across Ontario urban areas with the capacity to accommodate growth; (e.g., those with adequate development lands within their existing urban boundaries, serviced by municipal sewers, water, roads and transportation infrastructure) are imperative. It is only through enacting these policies at the provincial level that the finite resource which is Ontario's agricultural land can be protected and preserved.

We mention these over-arching policy recommendations as context, and we are pleased to provide our responses to the questions from the proposal.

General:

Visual images and graphics to illustrate projection methodology concepts would be helpful. A good example of this are the illustrations provided in the Minimum Distance Setback Guidelines found in Figures 3-8. This kind of illustration would be particularly helpful in demonstrating the Simpler Methodology for small rural municipalities. Explanatory graphics would also make it easier for local Federations of Agriculture to understand the methodology being used so that they can participate and provide meaningful input into the Settlement Area Expansion process.

Population Projections (Data):

The current guideline touches briefly on the Ministry of Finance population projections, but the information provided in the guidelines on this topic could be strengthened by including information as to where to find the population projections that have been generated, and the calculations which have been used to generate them. Templates and training opportunities would be a positive addition to the guideline. With respect to temporary populations, we note that the activity rate explained in the guideline "does not assume any relationship between the jobs in a municipality and where the holders of those jobs live." (59) Therefore, temporary populations comprised of seasonal workers or non-permanent recreational seasonal residents should have a separate measurement and should not be included in calculations of new greenfield lands required to accommodate them.

Housing Need Projections:

OFA recommends that stronger protection against development on agricultural land combined with fixed, permanent urban boundaries and mandatory compliance with urban density and intensification requirements must be emphasized and included in the guidelines. For any new Greenfield housing area designations, the highest density possible should be a requirement. The guidelines need to convey the importance of affordable housing opportunities like condos and stacked townhouses to municipalities through the projection methodology so that in turn municipalities can present those options to developers. Accommodating market trends by allowing single family detached housing type preferences to dominate market analysis and

generate larger greenfield lands calculations can not continue at the current pace if Ontario's finite and dwindling agricultural land reserves are to be preserved and protected for the purposes of producing food, fibre, and fuel. Including a housing affordability analysis demonstrating alternative models of higher density dwelling types over single family detached dwelling types would be a positive improvement. Emphasis on stronger protection of agricultural lands must be included in the guidelines.

Employment Projections:

As stated earlier, improvements to services such as rural broadband would increase the number of work-from-home jobs or Primary Agricultural sector jobs in a given municipality. This would in turn result in a higher ratio of jobs projected for the residential and primary sector lands and reduce the need for new Greenfield lands to be taken into Settlement Areas to accommodate new Employment Lands. The Guidelines must stress the need for municipalities to accurately capture agricultural employment information as well as the employment potential of intensification in meeting job projection requirements. The Guidelines must also stress the need for municipalities to accurately gauge the number of residents who are currently working from home, as this is an employment development that is still in flux and may not have been fully identified through the most recent census.

Simpler Methodology:

The guidance document should continue to include a simpler methodology for smaller municipalities. Thresholds should be established that would trigger the use of the simpler methodology (e.g., population, capacity, geography), but municipalities which are near or in range of these identified thresholds for simplified methodologies should still have the option to employ them. Best practices for land budgeting could include requiring municipalities to provide analysis of intensification opportunities for existing employment lands.

Rural, Agricultural and Northern Municipalities:

OMAFRA's county agricultural employment data provides a detailed breakdown of the jobs in rural and agricultural areas. A reference to this resource could be included in the guidelines. Further, the guideline could direct municipalities to ensure that jobs in value-added, on-farm diversified, agriculture related and agri-tourism businesses in rural and agricultural areas exist and should be counted in employment needs projections. More than 800,000 jobs are generated by the agri-food sector in Ontario, and these kinds of employment opportunities must be calculated. It is important to accurately assess the numbers of jobs generated in these types of workplaces so that they can be deducted from the Employment Lands needs calculations which inform Settlement Area Expansions. In support of that goal, a template for an employment survey which effectively tabulates agriculture and agri-food jobs in the urban and rural areas could be included in the guideline. Additionally, a template for an Agricultural Business Retention and Expansion survey could be included as well.

Other Considerations:

Agricultural Impact Assessments (AIAs) are a key tool for land use planning and economic development. OFA wholeheartedly supports the principle of using AIAs province-wide to mitigate the impacts of non-agricultural developments on neighbouring farmlands. We would support a reference to this tool within the guideline. Distributed economic development, in accordance with the PPS, and investment in Ontario's rural and small communities enables agri-food businesses to continue to drive the economy forward, while reducing urban development pressures. OFA recommends conversion of the urban intensification and greenfield development targets to mandatory requirements that are not open to appeal and encourages the highest density development possible on existing Greenfield areas before additional farmland is taken into the settlement areas.



Thank you for the opportunity to provide comment. OFA appreciates and welcomes the updates to the Projection Methodology guidelines and looks forward to the release of the new document.

Sincerely,

A handwritten signature in black ink, reading "Peggy Brekveld". The signature is written in a cursive style with a period at the end.

Peggy Brekveld
President

cc: OFA Board of Directors