ONTARIO FARMLAND TRUST
PROTECTING FARMLAND FOREVER

October 9th, 2025

The Honourable Rob Flack
Ministry of Municipal Affairs and Housing
777 Bay St., 17th Floor
Toronto, ON M7A 2J3

Dear Minister Flack,

RE: ERO 025-0844; Proposed Updates to the Projection Methodology Guideline to support the implementation of the Provincial Planning Statement, 2024 (PPS, 2024)

On behalf of the Ontario Farmland Trust (OFT), I am pleased to provide comments on the Proposed Updates to the Projection Methodology Guideline (PMG). OFT is a non-profit organization dedicated to protecting Ontario's farmland, which is the foundation of our agri-food system and a vital, non-renewable resource. With prime farmland making up less than 5% of Ontario's land base, and with the province losing 319 acres each day (Statistics Canada, 2021), careful planning is essential to safeguard this resource for future generations.

Farmland is the foundation of the agri-food sector that supports over 871,000 jobs and contributes over $50 billion annually to Ontario's GDP[1]. Protecting this land is central to food security, climate resilience, and the long-term sustainability of Ontario's communities and economy.

We welcome the province's efforts to update the PMG and believe the proposed changes represent progress. However, without stronger standards and safeguards, the updated PMG risks repeating the shortcomings of previous approaches, which often resulted in inflated land needs and unnecessary farmland conversion. Below, we highlight our observations and recommendations.

Summary of OFT Comments and Recommendations:

- **Calibrate housing forecasts to reality**
  Require comparison of forecasts with the past 10–15 years of actual completions, and avoid fixed age-to-housing assumptions without local evidence.
- **Strengthen scenario testing**
  Run low, medium, and high scenarios, and update forecasts when new Ministry of Finance data significantly changes assumptions.

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[1] https://ofa.on.ca/local-snapshots

- **Protect allocation integrity**
  Adopt a provincial allocation template with reconciliation across municipalities to avoid double-counting and inconsistent land budgets.
- **Normalize employment land projections**
  Use standard benchmarks for jobs per hectare and floor space per worker, with regular reassessment.
- **Prioritize Brownfield and Under-Utilized Capacity**
  Require the use of brownfield and under-utilized lands before expanding into farmland.
- **Guard against inflated land estimates**
  Provide clear provincial guidance on net-to-gross assumptions and density standards to avoid inflated land needs.
- **Improve transparency**
  Publish inputs and assumptions as open data, and require explanation when municipalities choose between multiple methods.

Legacy PMG and Farmland Loss

Past methodologies often relied on outdated assumptions that did not reflect evolving housing preferences or demographic trends. For example, forecasts frequently presumed continued demand for single-detached homes, even as actual growth has shifted toward apartments and townhouses[2]. Between 2016 and 2021, higher-density units grew faster than single-detached housing, yet projections still favoured low-density development.

These shortcomings contributed to inflated land budgets, premature boundary expansions, and the conversion of farmland that could otherwise have been protected. [3, 4] While growth and change are inevitable, methodologies that overestimate land needs put disproportionate pressure on Ontario's limited farmland resource.

Positive Elements in the Updated PMG

The draft PMG includes several constructive developments:

- A clearer framework for standardized inputs;
- Greater emphasis on cross-boundary coordination; and

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[2] https://www.statcan.gc.ca/en/census/census-engagement/community-supporter/type-dwelling

[3]
https://www.academia.edu/109693105/How_many_and_how_do_we_know_Assessing_population_projection_methods_in_Ontario

[4] www.waynecaldwell.ca/redesign/wp-content/uploads/2020/07/Measuring-Farmland.pdf

- Simplified procedures for small and rural municipalities.

These changes should improve consistency, accessibility, and transparency. They represent meaningful progress and reflect lessons learned from earlier approaches.

Remaining Concerns

Despite these improvements, the updated PMG leaves important gaps:

- Discretion in forecasts: The relationship between projected population growth and housing requirements is still loosely defined, allowing municipalities wide latitude in translating population forecasts into land needs. This flexibility increases the risk of boundary expansions that are not justified by actual demand.
- Inconsistent assumptions: Without clearer provincial guidance, municipalities can apply different assumptions about densities, developable land, and phasing. These inconsistencies increase the likelihood of inflated land requirements.
- Speculation pressures: Boundary expansions often raise land values at the point of designation rather than when homes are built. This dynamic fuels speculation, drives up farmland prices, and does not ensure timely housing delivery.
- Risk of farmland loss: When forecasts overestimate land needs, farmland is often the first casualty. Given that Ontario already loses farmland at unsustainable rates, a more cautious and evidence-based approach is required.

OFT Recommendations

To strengthen the PMG, we recommend the following refinements:

1. **Calibrate housing forecasts to reality**
    - Compare forecasts to the past 10–15 years of actual completions.
    - Avoid fixed assumptions about age or cohort preferences without local evidence.
2. **Strengthen scenario testing**
    - Run low, medium, and high scenarios for population, housing, and employment growth.
    - Require municipalities to update forecasts when new Ministry of Finance data significantly changes assumptions.
3. **Safeguard allocation integrity**
    - Use a provincial allocation template to ensure consistency.
    - Require reconciliation and co-signoff across municipalities to prevent double-counting.
4. **Normalize employment projections**
    - Use standard benchmarks for jobs per hectare and floor space per worker.
    - Reassess regularly to reflect trends such as automation and remote work.
5. **Prioritize intensification**

- o Require an inventory of brownfield and under-utilized lands before approving greenfield expansions.
- o Focus on addressing servicing and approval bottlenecks rather than boundary expansions.

6. **Guard against inflated assumptions**
   - o Provide clear guidance on density and net-to-gross assumptions.
   - o Ensure deductions and phasing align with realistic growth horizons.

7. **Improve transparency**
   - o Publish all inputs and assumptions as open data.
   - o Require municipalities to explain their choice of methodology when multiple approaches are used.

Key Takeaways

Previous methodologies often overestimated land requirements, which contributed to unnecessary farmland loss. The updated PMG offers an opportunity to correct these issues and ensure more accurate, transparent, and responsible planning. By calibrating forecasts to reality, strengthening scenario testing, prioritizing intensification, and enhancing transparency, Ontario can meet housing needs while safeguarding farmland.

We appreciate the progress made to date and encourage the province to integrate these refinements. OFT looks forward to continued collaboration to ensure Ontario's land-use planning framework protects both housing supply and farmland preservation.

Thank you for the opportunity to provide comments.

Sincerely,

Martin Straathof
Executive Director
Ontario Farmland Trust