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PROVINCIAL PLANS: A PRIMER

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Ontario's land use planning system has been described as being "policy-led," meaning that the Province establishes a policy framework within which all planning decisions are made. The policies establish values and interests to guide local and provincial planning decisions, and encourage province-wide consistency in how land is allocated for use and conservation. At the heart of this framework is a set of provincial plans, which establish geographically-specific policies, and with which all land use decisions must conform. This research paper provides a primer on Ontario's provincial plans and how they are implemented in land use planning decisions.

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Contents

INTRODUCTION	1
ONTARIO'S LAND USE PLANNING SYSTEM	2
PROVINCIAL PLANS	3
Other Approval Authorities	4
THE GREENBELT	5
Niagara Escarpment Plan (2017)	5
Oak Ridges Moraine Conservation Plan (2017)	5
Greenbelt Plan (2017)	6
GROWTH PLANS	7
Growth Plan for the Greater Golden Horseshoe (2020)	7
Growth Plan for Northern Ontario (2011)	8
DEVELOPMENT PLANS	9
Parkway Belt West Plan	9
Central Pickering Development Plan	9
DESIGNATED POLICIES	10
<i>Lake Simcoe Protection Act, 2008</i>	10
<i>Great Lakes Protection Act, 2015</i>	10
<i>Clean Water Act, 2006</i>	10
CONCLUSION	11
APPENDIX: PROVINCIAL PLANS AND AUTHORIZING STATUTES	12
NOTES	13

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Introduction

Ontario’s land use planning system has been described as being “policy-led,” meaning that the Province establishes a policy framework within which all planning decisions are made. The policies establish values and interests to guide local and provincial planning decisions, and encourage province-wide consistency in how land is allocated for use and conservation. At the heart of this framework is a set of provincial plans, which establish geographically specific policies, and with which all land use decisions must conform. This research paper provides a primer on Ontario’s provincial plans and how they are implemented in land use planning decisions.

Land use planning decisions can have long-term impacts on regional economies, and affect where people work and live. However, Ontario’s size and diversity have meant that provincial planning objectives may not always be achieved with a one-size-fits-all approach. Provincial plans add a layer of policy specificity, tailored to particular areas in Ontario.

This paper is not intended to be comprehensive, and readers are recommended to review the provincial plans themselves for more information. Hyperlinks to the plans and maps, where available, are provided below and in the appendix.

Ontario's Land Use Planning System

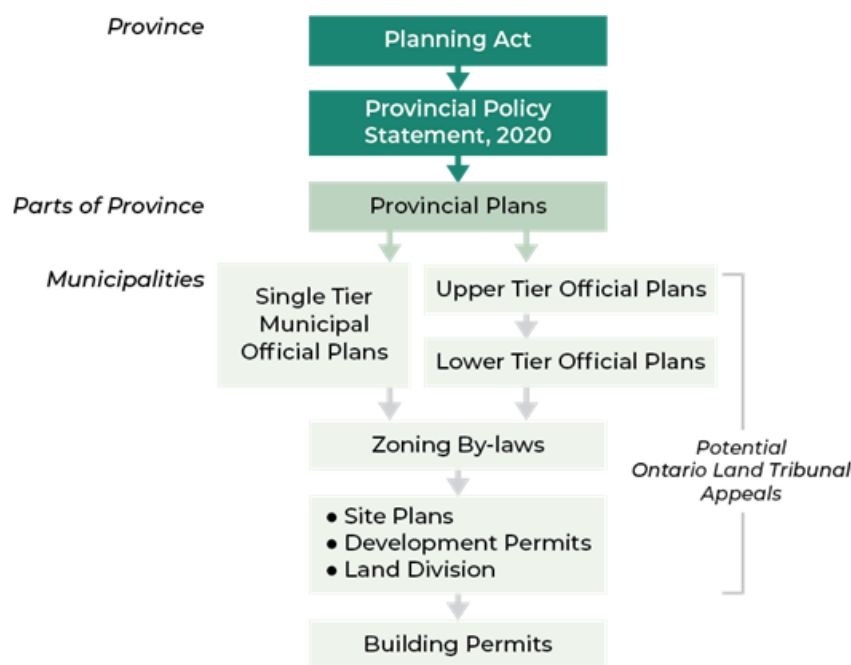
A number of statutes govern land use decisions in Ontario. Primary among these is the *Planning Act*, which establishes a framework of provisions, regulations, and policy statements to promote provincial interests in how land is used. The Act identifies the matters of provincial interest that planning approval authorities, including the Minister of Municipal Affairs and Housing, municipalities, and others must consider in making decisions about land use. These matters range broadly, from the protection of ecological systems and agricultural resources, to the provision of employment opportunities and housing, to the promotion of sustainable development.¹

The [Provincial Policy Statement, 2020](#) (PPS) is the province's overarching planning policy document. It provides broad direction in how matters of provincial interest are to be promoted through land use decisions, and the Act requires all planning decisions to be consistent with the PPS's policies.

The *Planning Act* also identifies provincial plans, which are geographically specific and tailored to particular policy objectives (e.g., land conservation, or intensification of development). The Act is more stringent in how provincial plans are applied, requiring that planning decisions *conform* with the plans' policies, rather than be *consistent* with them.² This is reflected in the more specific nature of provincial plan policies.

Provincial land use policies are implemented by municipal planning authorities, local planning boards, conservation authorities, and others through their decisions and approvals, and in the adoption of local policies or legislation. Implementation is described in more detail below.

Figure 1: Ontario's Planning Framework



Source: Ministry of Municipal Affairs and Housing; Legislative Research

Provincial Plans

Provincial plans govern land use decisions in specific geographical areas. They range from standalone plan documents (such as the Greenbelt Plan) to designated policies embedded within other plans (such as some—but not all—of the Lake Simcoe Protection Plan’s policies). Although provincial plans are intended to align with and complement the PPS, their policies typically prevail where conflicts arise.

The *Planning Act* identifies provincial plans as being the following:

- a) the Greenbelt Plan established under section 3 of the *Greenbelt Act, 2005*;
- b) the Niagara Escarpment Plan established under section 3 of the *Niagara Escarpment Planning and Development Act*;
- c) the Oak Ridges Moraine Conservation Plan established under section 3 of the *Oak Ridges Moraine Conservation Act, 2001*;
- d) a development plan approved under the *Ontario Planning and Development Act, 1994*;
- e) a growth plan approved under the *Places to Grow Act, 2005*;
- f) a designated policy as defined in section 2 of the *Lake Simcoe Protection Act, 2008*;
- g) a designated policy as defined in section 3 of the *Great Lakes Protection Act, 2015*;
- h) a designated Great Lakes policy or a significant threat policy, as those terms are defined in subsection 2(1) of the *Clean Water Act, 2006*; or
- i) a prescribed plan or policy or a prescribed provision of a prescribed plan or policy made or approved by the Lieutenant Governor in Council, a minister of the Crown, a ministry or a board, commission or agency of the Government of Ontario.³

Municipal Role in Implementing Provincial Planning Policy

Although provincial policy provides some consistency in how planning decisions are made, local factors such as demographics, geography, and economics inform how municipalities implement those policies. The key municipal planning instrument is the official plan, which establishes a community’s goals, objectives, and policies to manage change and growth. The *Planning Act* sets requirements for what official plans must contain and requires municipalities to review them every five years to ensure conformity with provincial plans and policy.⁴ Municipal conformity with provincial plans is further enforced by the Minister of Municipal Affairs and Housing (who approves municipal official plans and amendments) and the appeals regime administered by the Ontario Land Tribunal.⁵

Municipalities also pass by-laws to implement their official plans' policies, such as zoning by-laws, which govern such matters as land use, density (e.g. the number of units allowed per hectare), the size and placement of structures, and other things. Municipalities may also control the subdivision of land by approving how larger blocks of land are broken up into smaller lots. In certain circumstances, municipalities have some control over the design of new developments, such as through the site plan approval process.

Municipal by-laws must also conform with provincial plans, and must be updated periodically for conformity with official plans.⁶

Other Approval Authorities

All land use approval authorities' decisions must similarly conform with provincial plans. These authorities include:

- local boards, such as a library board or transportation commission;
- planning boards, which assume planning approval functions in some Northern Ontario municipalities and in areas without municipal organization;
- a minister of the Crown; and
- a ministry, board, commission, or agency of the government, including the Ontario Land Tribunal (which hears appeals of planning decisions).⁷

The Greenbelt

The Greenbelt is an area of protected land that roughly encircles the Greater Toronto and Hamilton Area. It also includes the Niagara Escarpment and the Oak Ridges Moraine, and comprises over 800,000 hectares.

The Niagara Escarpment and Oak Ridges Moraine protected areas predate the Greenbelt (1985 and 2002 respectively). When the *Greenbelt Act, 2005* was passed, it was intended to create a mass of contiguous protected land by establishing Protected Countryside Areas in the gaps in between the existing protected areas. Accordingly, “the Greenbelt” refers to the area protected by three provincial plans: the Oak Ridges Moraine Conservation Plan, the Niagara Escarpment Plan, and the Greenbelt Plan.⁸

Niagara Escarpment Plan (2017)

The [Niagara Escarpment Plan \(2017\)](#) is the oldest of the Greenbelt’s provincial plans. The plan is a regulation under the [Niagara Escarpment Planning and Development Act](#), first made in 1985. It states as its purpose “to provide for the maintenance of the Niagara Escarpment and land in its vicinity substantially as a continuous natural environment, and to ensure only such development occurs as is compatible with that natural environment.”⁹ The plan contains policies that restrict development incompatible with conserving the Escarpment’s natural features, although it contains urban areas with existing settlements where development is permitted. Such urban areas are designated in the plan, and are prevented from expanding into the Escarpment’s protected natural and rural areas.¹⁰

The current plan area stretches from the Niagara River to Tobermory on the Bruce Peninsula, totaling almost 200,000 hectares of land. Areas within the Plan are assigned one of seven land use designations, which correspond to a set of policies governing land use, development controls, and protection of natural features.

The Niagara Escarpment is unique in having an independent planning authority that can approve or refuse development permits, or recommend plan amendments to Cabinet.¹¹ The arms-length Niagara Escarpment Commission (NEC) is appointed by order in council, and consists of 17 members, nine of which are members of the public, with eight representatives from local municipal councils.

Oak Ridges Moraine Conservation Plan (2017)

The Oak Ridges Moraine is an irregular ridge that stretches approximately 160 kilometers north of Toronto, from the Niagara Escarpment to the Trent River. It divides the watersheds draining into Lake Ontario from those draining into Georgian Bay and comprises approximately 190,000 hectares. It contains some important natural features, not least of which is its function as a water recharge/discharge area due to its sand, silt, and gravel deposits.¹²

The Oak Ridges Moraine Conservation Plan was adopted in April 2002 as a [regulation](#) under the [Oak Ridges Moraine Conservation Act, 2001](#), with the most recent version issued in 2017.

It contains four land use designations governing land development, aggregate extraction, and agricultural and recreational uses, among other things. The plan identifies key natural and hydrologically sensitive features, and areas of high aquifer vulnerability,¹³ while establishing a policy framework for their protection by prohibiting or limiting development in these areas. The plan also identifies landform conservation areas, requiring that development minimize impact on the topographical character of these areas.¹⁴

The Oak Ridges Moraine does not have an equivalent regulatory body to the Niagara Escarpment Commission; rather, land use decisions are made by the local municipality. The plan prescribes how municipal policies must achieve its objectives. For instance, it requires that local official plans establish wellhead protection areas and policies.¹⁵ In addition, local municipalities must prepare watershed plans, which establish a framework for assessing, conserving, and monitoring a watershed. The plan also prohibits municipalities from approving major developments where the applicant has not demonstrated adequate protection of hydrologically sensitive features, as identified in watershed plans.¹⁶

Greenbelt Plan (2017)

The [Greenbelt Plan \(2017\)](#), which was adopted by Cabinet under the [Greenbelt Act, 2005](#), generally limits development within its plan area. It is sometimes characterized as a counterpoint to the Growth Plan for the Golden Horseshoe (about which more below). The Greenbelt Plan protects agricultural land, water resources and natural features from incompatible development through a variety of policies. These include the identification of key natural features for protection, restrictions on certain types of land uses, and limitations on lot creation through severance or subdivision, among other policies.

The Greenbelt area was expanded in 2017 with the addition of 21 urban river valleys and seven coastal wetlands.¹⁷ In February 2021, the Province [announced](#) that it would consult on further expansions, such as through the addition of the Paris Galt Moraine and other areas. The Province has made a number of minor technical adjustments to the Greenbelt boundary which, as of 2017, had removed approximately 150 hectares.¹⁸

The Greenbelt Plan identifies lands as being settlement areas, parkland and open space, urban river valleys, or within the agricultural or natural system. The plan further breaks down these areas with geographically specific designations, within which only certain uses are permitted. A key feature of the plan is its restriction on expanding settlement areas into the natural heritage system (areas with the highest concentration of sensitive or significant natural features and functions) or specialty crop areas (such as the Holland Marsh).¹⁹

Growth Plans

Growth plans, issued under the [Places to Grow Act, 2005](#), are provincial plans that govern how densities of homes and jobs are managed in Ontario. Two growth plans have been approved by Cabinet under the Act: one for the Greater Golden Horseshoe and another for Northern Ontario. Although their geographies are considerably different, the plans share the common feature of leveraging growth for economic and community development, and for planning infrastructure investments.

Growth Plan for the Greater Golden Horseshoe (2020)

[A Place to Grow: Growth Plan for the Greater Golden Horseshoe \(2020\)](#) is a key policy document that guides development in the Greater Toronto and Hamilton Area, premised on population growth forecasts to 2051. The plan encourages the efficient use of land by coordinating housing, jobs, and investments in transit and other infrastructure in compact development patterns, and directs municipalities to intensify settlement areas within their boundaries. Settlement areas are areas that already contain a mix of residential or employment uses, or are planned for growth over a long-term planning horizon.²⁰ Strategic growth areas within settlement areas are those planned for intensification, and include urban growth centres (as identified by the Province in the growth plan) and major transit station areas (where higher order transit is planned or already built).²¹ The plan also limits development on environmentally sensitive lands, and requires municipalities to identify and protect water resources, natural heritage features, and valuable agricultural resources, among other requirements.

A key feature of the Growth Plan is its establishment of density targets, which municipalities must achieve for identified “urban growth centres,” depending on their size. For instance, the City of Toronto’s urban growth centres must accommodate 400 residents and jobs combined per hectare. Smaller municipalities like Brampton and Peterborough have lower targets (200 and 150 residents and jobs per hectare respectively).²² Further, in the vicinity of major transit stations (built or planned), municipalities are given additional density targets depending on the mode of transportation (e.g., subway, light rail).²³

The Growth Plan also establishes intensification targets, requiring municipalities to direct development to areas that are already developed (referred to as “delineated built-up areas”). For instance, 50% of residential development must occur within certain municipalities’ delineated built-up areas.²⁴ Lower density municipalities are given more leeway to set their own intensification targets.²⁵

The Growth Plan also imposes requirements on how municipalities may develop greenfield areas outside their delineated built-up areas, such as planning them as complete communities, and achieving more modest density targets.²⁶

Growth Plan for Northern Ontario (2011)

The [Growth Plan for Northern Ontario](#) was approved by Cabinet in 2011. It is a 25-year plan that applies to all of Northern Ontario, from the Parry Sound and Nipissing districts to Hudson Bay. It “is in part an economic development plan, an infrastructure investment plan, a labour market plan and a land-use plan,” and is less prescriptive than the Growth Plan for the Greater Golden Horseshoe.²⁷ The plan does not prescribe density or intensification targets, but rather encourages compact and mixed land uses in Greater Sudbury, North Bay, Sault Ste. Marie, Thunder Bay, and Timmins.²⁸ The plan also provides a framework for Indigenous economic and community development, education, health, and land-use planning.²⁹

Development Plans

The [Ontario Planning and Development Act, 1994](#) gives Cabinet the authority to issue development plans. Development plans have been used to provide planning guidance for lands that are largely publically owned, and/or are anticipated to be transferred to private development. Cabinet has issued two development plans: the Parkway Belt West Plan (PBWP) and the Central Pickering Development Plan (CPDP; 2012).

Parkway Belt West Plan

The PBWP dates from 1978, when a series of linked, linear lands were designated “to create a multi-purpose utility corridor, urban separator and linked open space system” around Toronto and some adjacent municipalities.³⁰ Much of it is comprised of linear infrastructure, such as roads, hydro transmission corridors, and public parks and open space. PBWP lands are not subject to the Greenbelt Plan’s Agricultural System policies, but the Natural System, and the parkland, open space, and trails policies apply.³¹ The plan has been amended numerous times since its adoption.³²

Central Pickering Development Plan

The [Central Pickering Development Plan](#) (CPDP) was approved by Cabinet in 2006 for lands in northwest Pickering. The plan was updated in 2012. The CPDP includes portions of the Seaton lands, which had been expropriated for a new airport in the 1970s, and the Duffins Rouge Agricultural Preserve. The plan was, in part, motivated by a land exchange with developers who had owned lands in the Oak Ridges Moraine, which were newly protected from development.³³ The Seaton Land Transfer saw over 900 hectares of moraine lands given to the Crown in exchange for developable parcels within the CPDP’s boundaries in 2007.³⁴

The CPDP anticipates 15 compact urban neighbourhoods with a range of residential, mixed-use, and employment uses for eventual residents, while retaining reserves of forests, fields, and streams. It also protects prime agricultural land and promotes agricultural land uses in the Duffins Rouge Agricultural Preserve.³⁵ To achieve its goals, it requires the municipality to undertake a number of studies for the CPDP lands, including a Master Environmental Servicing Plan, a Natural Heritage System Management Study, and detailed neighbourhood plans, among others.³⁶

Designated Policies

In addition to the plans described above, the *Planning Act* gives certain “designated policies” the authority of provincial plans with which planning decisions must conform. These include policies made under the *Lake Simcoe Protection Act, 2008* and the *Great Lakes Protection Act, 2015*. Certain policies contained in source protection plans, made under the *Clean Water Act, 2006*, are also given the authority of provincial plans.

Lake Simcoe Protection Act, 2008

The [Lake Simcoe Protection Plan](#) (2009; LSPP), approved under the authority of the [Lake Simcoe Protection Act, 2008](#), is intended to “protect, improve or restore the elements that contribute to the ecological health of the Lake Simcoe watershed,” among other objectives. The LSPP is not identified as a provincial plan in the *Planning Act*; rather, the Act gives the plan’s designated policies the same authority as a provincial plan. For example, the LSPP has a designated policy that no new non-municipal sewage treatment plants can be established in the watershed, except when certain conditions are met.³⁷ By extension, municipal decisions in respect of such plants (such as issuing building permits or amending zoning by-laws) must conform with the designated policy, by ensuring that the conditions are met before a plant is approved. However, the plan also contains other non-designated policies to which planning authorities must “have regard,” without strictly conforming to them, as well as “strategic actions” that local municipalities are encouraged to take to protect the watershed.³⁸

Great Lakes Protection Act, 2015

The [Great Lakes Protection Act, 2015](#) is intended to “protect and restore the ecological health of the Great Lakes-St. Lawrence River Basin,” while encouraging public participation in the efforts.³⁹ The Act allows public bodies to propose “initiatives” for the protection of the Great Lakes for approval by the Minister of the Environment, Conservation and Parks.⁴⁰ Such initiatives may identify designated policies, which are given the authority of provincial plans.⁴¹

Clean Water Act, 2006

The [Clean Water Act, 2006](#) establishes a framework for protecting “existing and future sources of drinking water.”⁴² Among other responsibilities, the Act requires conservation authorities to undertake source protection plans, which lay out policies for protecting existing and future sources of drinking water.⁴³ Among other things, source protection plans may establish “designated Great Lakes” policies and “significant threat” policies, both of which are considered provincial plans under the *Planning Act*.⁴⁴ For instance, a significant threat policy in the source protection plan for the combined Credit Valley, Toronto and Region, and Central Lake Ontario source protection region prohibits new waste disposal sites in certain sensitive areas where they could pose a significant drinking water threat.⁴⁵

Conclusion

Land use planning decisions are far-reaching and can have long-term and sometimes unforeseen impacts. Selecting a site for transportation infrastructure or encouraging development in some places while restricting it in others will affect how people work and live, and where investments are directed. Ontario's policy-led planning framework is intended to provide consistency in land use decisions while advancing matters of provincial interest. The province's diverse geography, economy, and demographics have informed a more geographically tailored approach to achieving provincial objectives, particularly through provincial plans. However, provincial plans cannot anticipate every outcome, proposed development, or the larger forces that shape regional economies, and municipal implementation in response to local conditions may provide more nuance to provincial policy.

There is a political dimension to provincial plans, and they have not been exempt from controversy. The Greenbelt, for example, is considered by some to constrict land supply, which may have an impact on housing supply or affordability.⁴⁶ A recent report criticized the Growth Plan for the Greater Golden Horseshoe's growth forecast methodology, while questioning how it measures success.⁴⁷ Sewage infrastructure expansion in York Region to accommodate Growth Plan population forecasts sparked controversy over its potential impacts on Lake Simcoe or the Oak Ridges Moraine, demonstrating how provincial plans grapple with sometimes competing objectives.⁴⁸

Such criticism is perhaps an inevitable by-product of any comprehensive policy regime, and provincial plans continue to evolve as conditions change and outcomes emerge. For instance, the Greenbelt Plan must be reviewed every ten years to test its effectiveness, and Growth Plan forecasts are to be updated every five years, in consultation with municipalities.⁴⁹ Municipalities, for their part, are compelled to review their own planning policies every five years for consistency with the Province's.

Since the adoption of the Parkway West Belt Plan in 1978, provincial plans have played an increasingly prominent role in Ontario's planning framework. They have informed where and how Ontarians live and work, and reflect evolving values about land use and conservation over four decades. The legacy of provincial plans is evident in the province's development patterns and transportation networks, and their impact will continue in the decades to come.

Appendix: Provincial Plans and Authorizing Statutes*

Provincial Plan	Authorizing Statute	Most Recent Version	Plan Area
Greenbelt Plan (2017)	<i>Greenbelt Act, 2005</i>	2017	Greenbelt Plan Area (2017)
Niagara Escarpment Plan (2017)	<i>Niagara Escarpment Planning and Development Act</i>	2017	Niagara Escarpment Plan Area (2017)
Oak Ridges Moraine Conservation Plan (2017)	<i>Oak Ridges Moraine Conservation Act, 2001</i>	2017	Oak Ridges Moraine Conservation Plan Area (2017)
Growth Plan for the Greater Golden Horseshoe (2020)	<i>Places to Grow Act, 2005</i>	2020	Greater Golden Horseshoe Growth Plan Area (2020)
Growth Plan for Northern Ontario (2011)	<i>Places to Grow Act, 2005</i>	2011	Northern Ontario Growth Plan Area (2011)
Parkway Belt West Plan (1978)	<i>Ontario Planning and Development Act, 1994</i>	Consolidated version as of 2008	Parkway Belt West Planning Area
Central Pickering Development Plan (2012)	<i>Ontario Planning and Development Act, 1994</i>	2012	Central Pickering Development Planning Area
Designated policies under the <i>Lake Simcoe Protection Act, 2008</i>	<i>Lake Simcoe Protection Act, 2008</i>	2009	Lake Simcoe Protection Act Watershed Boundary (2018)

Source: Legislative Research, 2022

* This table does not include designated policies or significant threat policies made under the *Clean Water Act, 2006* or the *Great Lakes Protection Act, 2015*.

Notes

¹ *Planning Act*, R.S.O. 1990, c. P.13, s. 2. The Act uses the term “have regard to” in respect of matters of provincial interest.

² *Ibid.*, s. 3(5).

³ *Ibid.*, s. 1. Section 70.1 gives the Minister of Municipal Affairs and Housing the power to prescribe, in regulation, “plans or policies and provisions of those plans or policies” as provincial plans. This broad power does not appear to be exercised in the Act’s current, in-force regulations.

⁴ *Ibid.* s. 26(1.1).

⁵ *Ibid.*, s. 17(1). For lower-tier municipalities, upper-tier municipalities act as the approval authority for official plans. Some municipalities are exempted from Minister’s approval for official plan amendments.

⁶ *Ibid.*, s. 26(9).

⁷ *Ibid.*, s. 3(5).

⁸ [O. Reg. 59/05: Designation of Greenbelt Area](#), s. 1(1).

⁹ [Niagara Escarpment Plan \(2017\)](#), p. 7.

¹⁰ *Ibid.*, policy 1.7.

¹¹ The NEC issues development permits in an area designated as the Development Control Area under [R.R.O. 1990, Reg. 826](#).

¹² [Oak Ridges Moraine Conservation Plan \(2017\)](#), p. 1.

¹³ Under the *Clean Water Act, 2006*, an area of high aquifer vulnerability is “an aquifer on which external sources have or are likely to have a significant adverse effect, and includes the land above the aquifer.”

¹⁴ [O. Reg. 140/02: Oak Ridges Moraine Conservation Plan](#), s. 30.

¹⁵ *Ibid.*, s. 42(1). Under the *Clean Water Act, 2006*, a wellhead protection area is “an area that is related to a wellhead and within which it is desirable to regulate or monitor drinking water threats.”

¹⁶ *Ibid.*, 24(4).

¹⁷ Greenbelt Foundation, “[History](#).”

¹⁸ Ontario, “[Regulation Proposal Notice: Proposed Amendments to the Greenbelt Area boundary regulation](#),” May 10, 2016.

¹⁹ [Greenbelt Plan \(2017\)](#), policy 3.4.5. Settlement area expansions are also restricted by infrastructure limitations.

²⁰ [A Place to Grow: Growth Plan for the Greater Golden Horseshoe \(GPGGH\)](#), policy 2.2.1.

²¹ *Ibid.*, definitions.

²² *Ibid.*, policy 2.2.3.

²³ *Ibid.*, policy 2.2.4. The Minister can approve lower density targets in certain circumstances. See policy 2.2.4.4.

²⁴ *Ibid.*, policy 2.2.2. The municipalities are Barrie, Brantford, Guelph, Hamilton, Orillia, and Peterborough and the Regions of Durham, Halton, Niagara, Peel, Waterloo and York. Note that Toronto is not on this list, since it is completely built out, and all subsequent development would be considered intensification.

²⁵ These are the counties of Brant, Dufferin, Haldimand, Northumberland, Peterborough, Simcoe, and Wellington.

²⁶ GPGGH, policy 2.2.7.

²⁷ [Growth Plan for Northern Ontario](#) (2011), p. 2.

²⁸ *Ibid.*, policy 4.4.

²⁹ *Ibid.*, s. 7.

- ³⁰ Ministry of Municipal Affairs and Housing, "[Parkway Belt West Plan.](#)"
- ³¹ Greenbelt Plan (2017), policy 2.3.
- ³² At the time of writing, no consolidated version of the PBWP, including all its amendments, was available.
- ³³ York Region, *Report No. 4 of the Planning and Economic Development Committee*, April 27, 2006.
- ³⁴ Ontario, "[Seaton Land Transfer.](#)" See also, *Oshawa This Week*, "[Seaton land exchange complete,](#)" August 28, 2007.
- ³⁵ [Central Pickering Development Plan \(2012\)](#) s. 2. The preserve is an area of prime agricultural lands that was protected with conservation easements prior to the passing of the *Greenbelt Act, 2005*.
- ³⁶ *Ibid.*, s. 3.2.
- ³⁷ [Lake Simcoe Protection Plan \(2009\)](#), policy 4.4-DP.
- ³⁸ *Ibid.*, p. 7.
- ³⁹ [Great Lakes Protection Act, 2015, S.O. 2015, c. 24](#), s. 1.
- ⁴⁰ *Ibid.*, Part V. Public bodies include municipalities, local boards, conservation authorities, ministries, and Crown agencies and commissions
- ⁴¹ *Ibid.*, s. 19(4).
- ⁴² [Clean Water Act, 2006, S.O. 2006](#), c. 22, s. 1.
- ⁴³ *Ibid.*, c. 22, s. 22(1).
- ⁴⁴ *Ibid.* ss. 2 and 22(4). Significant threat policies identify and mitigate threats to drinking water.
- ⁴⁵ CTC Source Protection Committee, [Approved Source Protection Plan: CTC Source Protection Region](#), policy WST-5.
- ⁴⁶ John Ibbitson, "[There may be an answer to the housing crisis – let cities sprawl,](#)" *Globe and Mail*, January 10, 2022.
- ⁴⁷ Smart Prosperity Institute, [Forecast for Failure: How a Broken Forecasting System is at the Root of the GTA's Housing Shortage and How it Can be Solved,](#) January 2022.
- ⁴⁸ John Michael McGrath, "[The Ford government just froze one of the GTA's biggest sewage projects. Why?](#)" TVO, June 8, 2021.
- ⁴⁹ Greenbelt Plan (2017), policy 5.5; GPGGH (2020), policy 2.1.