



BOUSFIELDS INC.

Project No. 2403

May 5, 2026

Ministry of Municipal Affairs and Housing
Provincial Land Use Policy Branch
13th floor, 777 Bay St
Toronto, ON, M7A 2J3

Delivered Via Online Submission

Dear Sirs/Mesdames:

**Re: EOR Numbers 026-0229 and 026-2030
2026 Proposal to revoke the Parkway Belt West Plan, 1978 and O. Reg.
473/73**

Bousfield Inc. is the planning consultant to Markham Executive Golf Course (the "Lessee") with respect to a parcel of land located in the City of Markham, municipally known as 7892 McCowan Road (the "subject site"). The subject site is located within the Parkway Belt West Plan area and is subject to Ontario Regulation 473/73.

We are writing on behalf of Markham Executive Golf Course and Infrastructure Ontario ("IO") (the "Lessor") of the subject site, to provide comments regarding the Minister of Municipal Affairs and Housing (the "Minister") proposal to revoke the Parkway Belt West Plan, 1978 and associated Minister's Zoning Order O.Reg. 473/73. In particular, we are writing to request that the Minister consider a site-specific Minister's Zoning Order ("MZO") to correct longstanding land use conformity issues associated with the legally established non-conforming use of the Markham Executive Golf.

Markham Executive Golf Course currently leases the subject site from IO for the purpose of operating a golf course. The golf course has continuously operated on the subject site since 1970, prior to the government enacting O.Reg. 473/73 in 1973 and the Parkway Belt West Plan in 1978.

The subject site forms part of the Parkway Belt West Plan and associated O.Reg. 473/73, intended to be reserved for major transportation, utility, and infrastructure systems, while providing a linked open space system across the City of Markham. In many instances existing golf courses and recreational facilities were identified by site-specific policies under O.Reg. 473/73.

Although the golf course has operated continuously on the subject site since 1970, the golf course was not specifically identified in the Parkway Belt West Plan or identified as a permitted use under O.Reg. 473/73. Therefore, Markham Executive Golf Course

is subject to the provisions of *The Planning Act*, R.S.O 1970, c. 349, respecting legal non-conforming uses. The golf course has existed as a legal non-conforming use for more than five decades. While this non-conforming status allows the use to continue, the provisions of the Parkway Belt West Plan and O.Reg. 473/73 constrain routine maintenance, repairs, and minor upgrades and limit the ability to modernize or improve the site, buildings and structures.

This regulatory context has created ongoing compliance challenges for IO and Markham Executive Golf Course for continued operation of the golf course. Even modest improvements and necessary upgrades to buildings, structures, and site features, often required to support public safety, environmental protection, or operational viability, cannot be approved due to non-conformity with the Parkway Belt West Plan and O.Reg. 473/73. The resulting uncertainty affects both the lessee and lessor and constrains the ability to responsibly steward and invest in the subject site over the long term, notwithstanding the legal non-conforming status and complementary open space use of the subject site as a golf course.

In recognition of these challenges, and following extensive consultation with Infrastructure Ontario, provincial agencies with an interest in adjacent and underlying infrastructure assets, the City of Markham, the Ministry of Municipal Affairs and Housing (MMAH), Markham Executive Golf Course submitted an application in April 2025 seeking the revocation of the Parkway Belt West Plan as it applies to the subject site and corresponding amendments to O.Reg. 473/73 to expressly permit the existing golf course and associated uses (**MMAH File Nos.: 19-PBW-251709 and 19-MZOA-251726**). These amendments were submitted to address the omission of the existing golf course use from the Parkway Belt West Plan and O. Reg. 473/73, to ensure the use is expressly permitted on the subject site.

While the Minister previously undertook consultation on the proposed revocation of the Parkway Belt West Plan between October and December 2022, the current posting on the Environmental Registry of Ontario (ERO) proposing to revoke the Parkway Belt West Plan (026-0229) and O.Reg. 473/73 (026-0230), open for public comment until May 14, 2026, has resulted in the current applications for the subject site being placed on hold (see attached MMAH correspondence).

In the event the Minister revokes the Parkway Belt West Plan and O.Reg 473/73, without specific regard for the existing golf course as proposed in the MMAH File Nos.: 19-PBW-251709 and 19-MZOA-251726, the existing golf course would not be permitted by the City of Markham land use controls. Both the City of Markham Official Plan and Comprehensive Zoning By-law 2024-19 currently conform to the Parkway Belt West planning framework, and do not permit the existing golf course. Upon revocation, the existing golf course use would be subject require amendments to both

the City of Markham Official Plan and Comprehensive Zoning By-law 2024-19, in order for the existing use to be expressly permitted.

Given that there has already been extensive inter-agency consultation over the past year through MMAH File Nos.: 19-PBW-251709 and 19-MZOA-251726, revocation of the Parkway Belt West Plan and O.Reg. 473/73 would impact MMAH File Nos.: 19-PBW-251709 and 19-MZOA-251726 and create uncertainty with how to proceed with the current request for a Minister's Zoning Order to permit the gold course.

Accordingly, we respectfully request that the Minister consider a site specific Minister's Zoning Order to permit the existing golf course use of the subject site along with associated uses. A preliminary draft Minister's Zoning Order is attached for review and consideration.

We trust that the information and materials provided are sufficient for your review and circulation to the appropriate commenting departments, and that the application will be deemed complete. Should you have any questions or require additional information, please do not hesitate to contact the undersigned at your earliest convenience.

Yours truly,
Bousfields Inc.



David Charezenko, MCIP, RPP