

May 14, 2026

Ministry of Municipal Affairs and Housing
777 Bay Street
Toronto ON M7A 2J3

**RE: 2026 PROPOSAL TO REVOKE THE PARKWAY BELT WEST PLAN (PBWP)
AND THE FIVE MZO's ASSOCIATED WITH THE PBWP**

Batory Planning + Project Management are the planning consultants for Raulino Holdings Incorporated, the owner of 5244 1 Side Road in the City of Burlington (the "Subject Site"). The Subject Site is dual-designated as General Complementary Use Area and Public Open Space and Buffer Area by the Parkway Belt West Plan (PBWP). The Subject Site is contained within an Minister's Zoning Order (MZO) filed as O. Reg. 482/73, which came into force and effect in 1973. An application for an amendment to MZO O.Reg. 482/73 (MMAH File No.: 24-MZOA-255799) was initiated for the Subject Site on January 24, 2025.

This letter is submitted to the Ministry of Municipal Affairs and Housing to provide feedback on the Provincial government's proposal to revoke the Parkway Belt West Plan (PBWP) and the remaining portions of its 5 associated Minister's Zoning Orders (MZOs), referred to as ERO 026-0229.

Subject Site & Proposed Development

The Subject Site is generally bounded by No. 1 Side Road and private property to the north, the CN Railway Corridor to the east, Highway 407 ETR to the south, and Bronte Creek to the west. The Subject Site currently consists of three residential dwellings and the Iron Horse Performance equestrian facility which provides horse training, riding lessons, shows, camps, clinics, and special events. The facility also includes the sales and leasing of horses. The site features various buildings and stables, both indoor and outdoor horse training fields, and parking areas. In addition to the developed areas, the site also features a large amount of open/landscaped area, as well as a large forest adjacent to Bronte Creek.

On January 24, 2025, an application was originally filed, and Batory Planning + Management filed a resubmission on January 30, 2026 on behalf of Raulino Holdings Incorporated on to amend MZO O.Reg. 482/73 (MMAH File No.: 24-MZOA-255799) to permit recreational uses in the form of a soccer and athletic training facility on the Subject Site (the “proposed development”). The following documents and technical studies were completed to support the proposed development:

- Conceptual Site Plan, prepared by Project Studio Architects and Batory Planning + Management, dated January 2026
- Planning Justification Report, prepared by Batory Planning + Management, dated January 29, 2026
- Transportation Impact Study, prepared by UrbanTrans, dated January 29, 2026
- Natural Heritage Brief, prepared by Terrastory dated January 28, 2026
- Agricultural Impact Assessment, prepared by DBH Consulting, dated January 29, 2026
- Stage 1 and 2 Archeological Assessment, prepared by Irvin Heritage, dated December 11, 2025
- Wastewater Treatment System (WTS) Performance Evaluation & Capacity Assessment, prepared by King EPCM, dated December 15, 2025

Comments on Proposed Changes to the PBWP

ERO 026-0229 posting states that the purpose of revoking the PBWP is to “*support the government’s commitment to streamline, reduce, and eliminate burden*”. We are supportive of the Province’s initiative to streamline and modernize the planning approval process by revoking the PBWP and applicable MZOs to the Plan, however, we urge the Province to consider how this change may implicate ongoing applications.

Over the past several months, our client has been engaged with several parties and stakeholders, including the Mississaugas of the Credit First Nations (MCFN), and has completed various studies in accordance with the MZO process. We request that the application to amend the existing MZO continues as planned to advance the project and avoid further delays.

Conclusion

We thank you for the opportunity to provide comments and feedback on the proposed changes to the PBWP and associated MZOs. We trust that our comments will support the Province to make informed decisions that will improve Ontario's land use planning framework to advance new development across the GTA, and in this instance a recreation re-adaptation of the existing property.

Please do not hesitate to contact the undersigned should you have any questions.

Respectfully submitted by,



Paul Demczak, MCIP, RPP
Principal
Batory Planning + Management