



*land use planning  
&  
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September 15, 2025

**City of Markham Development Services Committee**

101 Town Centre Boulevard  
Markham, ON  
L3R 3W3

Attention: Chair and Members of the Committee

Re: Meeting of September 16, 2025, Agenda Item 9.1

CF/OT Buttonville Properties Inc. Redevelopment of Buttonville Airport

Application No. Plan 23-128636

MPLAN Inc. represents 774999 Ontario Ltd. c/o Armadale Properties, the owners of 60 Renfrew Drive and 1648438 Ontario Inc. on behalf of J. Addison School, located at 2 Valleywood Drive, Markham.

This letter is our written submission, on behalf of our clients, to the September 16, 2025, Development Services Committee (DSC) meeting, regarding Agenda Item 9.1.

Agenda Item 9.1 is the Recommendation Report for Official Plan Amendments, Zoning By-Law Amendment and a Draft Plan of Subdivision to permit eleven buildings intended for Employment and Business Park Uses, proposed for over 2,638,000 million square feet, on the former Buttonville Airport lands.

This submission follows meetings, discussions and previous submissions made on behalf of our clients to city staff, regarding issues and concerns related to the proposed redevelopment of the Buttonville Airport Lands.

As a general comment, it is disappointing that the opportunity to create a fully mixed-use community at this strategic location, as previously envisioned, is being abandoned in favour of an industrial/warehouse employment area that will provide limited employment opportunities. Modern warehouse and industrial uses make use of sophisticated technology, including robotics, resulting in low actual employment numbers, notwithstanding the large gross floor area of the proposed buildings.

**OUR REQUESTS**

Our clients are requesting that the Development Services Committee, in its consideration of the Staff Recommendation for the Subject Application:

1. Eliminate the Street B connection from Street A to Renfrew Drive and, associated with that deletion, eliminate driveway access from proposed Building 4 to Renfrew Drive, to ensure no additional traffic infiltrates the existing community. This would be accomplished, for the most part, by eliminating the proposed Amendment 1.2 to Map 10 – Road Network of the 2014 Official Plan;
2. Eliminate proposed Building 8 and on those lands provide for a public park as part of the 2% Parkland Contribution from the applicant; and
3. In lieu of the requirement for a Secondary Plan for the Business Park/Employment Lands, which should be the required planning process for this scale of development, at a minimum, require a Comprehensive Block Plan be

prepared for this application that specifically addresses the Phasing of Development, modifications to the proposed land use and configuration of development blocks and an appropriate Transportation Plan that provides for a more direct connection from Sixteenth Avenue, through the site to Allstate Parkway.

## **DETAILS OF OUR CLIENT'S CONCERNS**

In summary, our clients are primarily concerned that the road layout for the proposed development, as identified on the Development Concept Plan (Figure No. 4, dated 09/03/2025), includes a Street B connection to Renfrew Drive that will create additional traffic, including large trucks, that will infiltrate the area on a road not designed for that purpose. Traffic, including very large trucks from the new industrial park/employment area and from Sixteenth Avenue, would be able to travel south along Renfrew Drive to connect out to Woodbine Avenue. This will exacerbate the existing rush hour traffic along Renfrew Drive likely bringing it to a standstill. This heavy truck traffic will conflict with the current uses along Renfrew Drive, including the subject sites of our clients, on a road clearly not intended for this purpose.

From a planning perspective, the opportunity exists, since the site is vacant, to redesign the internal road network to provide for a more direct and efficient route through the business park that connects traffic from Sixteenth Avenue through the development to Allstate Parkway and Highway 7. This Major Collector Road would be consistent with the Major Collector Road identified in the 2014 official Plan that is to be removed from Map 10 – Road Network, in the Proposed Official Plan Amendment (Section 1.2) to the

2014 Official Plan. This obvious planning solution would create a more interesting design for the project and would require a re-alignment of Buildings 1, 2, 5 and 6 but would provide for a more direct Street A connection through the site and eliminate the need for Street B.

Staff, both in a recent response to our concerns, dated September 10, 2025, and in the Recommendation Report that was published in advance of the September 16 DSC meeting, have stated that **Renfrew Drive will not be a primary route for heavy truck traffic**. However, this statement is contradicted within the supporting documents provided by the Applicant, and within the Draft Conditions for the Plan of Subdivision that are being considered at this meeting. Our Responses to Staff's Recommendation Report are included below.

**SUMMARY OF ISSUES RAISED AND CITY STAFF'S RESPONSES**

On March 17, 2025, FIJ Law LLP sent a letter to staff outlining our clients' concerns with the development. This was followed by a letter sent on August 19, 2025, from MPLAN Inc. which reiterated three of the primary concerns expressed in the previous letter. The concerns set out in the August 19, 2025 and March 17, 2025, letters are responded to on pages 4 and 5 of the Recommendation Report under the DISCUSSION section and were also responded to in an email sent to MPLAN Inc. on September 10, 2025, from Rick Cefaratti, Acting-Development Manager, West District of Markham Planning and Urban Design Department.

For ease of reference, this submission will address four concerns that staff have indicated as having been resolved or have been considered in the staff report.

Conflicting statements, specifically related to truck traffic, are highlighted in yellow. The noted concerns, quoted from the Staff Report, are:

**1. Concerns raised that the Proposed Development conflicts with pick-up and drop-off from the schools located in the area and causes traffic issues on Renfrew Drive**

*Transportation Planning Staff concur with findings of the Owner's Transportation Study that indicated Renfrew Drive would not be a primary route for trucks to access employment uses on the Subject Lands. Instead, Allstate Parkway offers a more direct and efficient connection to Highway 404, 16th Avenue, and Woodbine Avenue via Valleywood Drive. Consequently, Staff also concur with the Transportation Consultant's recommendation that restricting truck traffic along Renfrew Drive is unnecessary. As part of future development and phases on blocks across the two existing private schools, Staff will require that Traffic Management Plan(s) be submitted to further assess proposed driveway accesses taking into consideration potential impacts on the existing school. This will ensure that truck traffic generated by employment uses does not compromise the safety and operations of nearby educational facilities.*

**2. Consideration of traffic alternative that eliminates a future extension to Renfrew Drive**

*Staff have advised that an alternative road pattern/block plan that eliminates all new traffic along Renfrew Drive and its future westerly extension cannot be supported. Restricting employment land use from using available public infrastructure (Renfrew*

*Drive and any new roads within the Subject Lands) for employment-related vehicle traffic within this area, does not align with the 2014 MOP. The 2014 MOP permits and aims to support employment uses. Accordingly, truck traffic restrictions on Renfrew Drive would have the opposite impact intended in the 2014 MOP as it would significantly and negatively impact the viability of these uses*

**Response to Items 1 and 2:** The letter dated March 17, 2025, inquired whether the city would consider an alternative road pattern that eliminates all new traffic along Renfrew Drive. The traffic from the new Employment and Business Park, which is expected to include a significant number of large trucks, should be contained within the redevelopment area.

It should be noted that the 2014 Official Plan Map 10 – Road Network, identified a Proposed Major Collector Road intended to connect the access from Sixteenth Avenue through the proposed new Employment and Business Park directly to Allstate Parkway in the manner I have recommended above, but for some reason the applicant has asked to eliminate this through the proposed Official Plan Amendment (1.2) and add Street B to bring the unwanted traffic out to Renfrew Drive. The resulting design of the internal road pattern of the new Employment and Business Park will create a number of 90 degree turning movements along Street A for the internal traffic, including the large trucks, that will be less than optimal.

Without a Street B connection from Street A, the only new buildings within the Development Concept Plan requiring access from Renfrew Drive would be Building 4 and Building 8.

The main driveway access from Building 4 should be internal to the development, to Street A, with no access to Renfrew Drive, which is not designed to accommodate additional traffic, especially large trucks.

We ask for different use of the site proposed for Building 8 to better serve the immediate community. This will be discussed later in this report.

It is inappropriate for city staff to suggest that our recommendation to eliminate a Street B connection to Renfrew drive would somehow “eliminate all new traffic along Renfrew Drive” and somehow “Restrict employment land use from using available public infrastructure (Renfrew Drive and any new roads within the Subject Lands) for employment-related vehicle traffic within this area.”

How would the elimination of Street B restrict the use of any new roads (such as the main one, Street A) for employment-related vehicle traffic within this area?

Although city staff have indicated that Renfrew Drive will not be a primary truck route, this is contradicted by a number of the Applicant’s supporting documents.

On July 4, 2025 a Noise Assessment prepared by GradientWind, dated November 13, 2024, was uploaded to the Markham Development Application Viewer. This document is intended to be a Feasibility Noise Study assessing the impacts of noise from the complete development prior to more detailed studies being conducted at the detailed design phase of the project. The Noise Study includes drawing number GW23-046-2, included in excerpt below:



Figure 1. Excerpt from Stationary Noise Assessment

On this drawing, Street B that is planned to connect with Renfrew Drive is clearly labeled a “Main Truck Route”. The Noise Consultant for the development proposal does not assess traffic impacts, however they identify the road connection to Renfrew Drive from Street A will be a Major Route to be used by trucks. This contradicts city staff’s opinion that Renfrew Drive will not be a primary route used for trucks.

The Applicant’s traffic consultant, BA Group, provided a response to the traffic related comments received by the Applicant. This document is dated January 17, 2024, which appears to be incorrect and we believe meant to be dated January 17, 2025. (the document was uploaded to Markham’s Development Application Map on January 21,

2025, and the document title on Markham's Development Application Map includes the phrase "Jan 2025" in brackets).

Our responses to the BA Group, comments 20 and 36, are the most relevant at this time. In response to comment 20, BA Group states that no heavy vehicle trips are anticipated to exit onto Renfrew Drive from Building 4 of the Development. In addition, they state that trucks have no purpose in heading southeast via Renfrew Drive and that the vehicle access to Building 4 will be for passenger vehicles. The traffic consultant states here that there is no purpose for trucks to use Renfrew Drive, however staff opined that to specifically restrict truck traffic along Renfrew would result in a negative impact on the planned employment uses. It is unclear why restricting truck traffic on Renfrew Drive, whether through the design of the road or through signage would compromise the planned employment uses, if it is also the opinion of staff and the transportation consultant that Renfrew Drive will not be a primary truck route.

Responding to Comment 36, BA Group state that 30-55% of the traffic along Renfrew Drive is expected to be due to the proposed development. BA Group also reiterates that no truck traffic is expected along Renfrew Drive, with only light vehicles expected.

However, the response to comments also includes a number of updated drawings and maps. Drawing VMD-08 shows a vehicle maneuvering diagram for the intersection of Renfrew Drive and proposed Street B that contradicts the statement that Renfrew Drive will not be a truck route. This maneuvering diagram has been prepared to plan for a road that can accommodate the turn of a 22.3-metre-long truck with a 14.6 metre turning radius. This drawing shows that the extension of Renfrew Drive (Street B), is being planned to accommodate truck traffic, even though staff and the traffic consultant

state that Renfrew Drive will not be a Primary Truck Route. Leaving aside the contradiction that staff state that Renfrew Drive will not be a Primary Truck Route, but that restricting truck traffic would result in a significant negative impact to the planned employment uses, if Renfrew Drive is not intended to be a Primary Truck Route, then it is obvious that it should not be designed to accommodate large trucks.

In addition, staff have also considered the risk of increased truck traffic along Renfrew Drive over the course of construction at the Buttonville site. Section 14 of the Draft Plan Conditions for the proposed development state the following:

Conditions for the Plan of Subdivision, included below:

*14.0 Site Access During Construction*

*14.1 Construction access and trades access to the proposed development shall be restricted to 16th Avenue and Allstate Parkway. Access through Renfrew Drive is not permitted.*

*14.2 A barricade and signate shall be provided at the south end of Renfrew Drive to prevent site access through Renfrew Drive.*

During construction, the Draft Conditions would prohibit truck traffic along Renfrew Drive. The conditions acknowledge the possibility that truck traffic along Renfrew will increase over the course of construction and specifically prevent such an outcome, but no similar consideration is made to limit truck traffic on Renfrew Drive once the development is completed. If it is staff's opinion that truck traffic will not travel along

Renfrew Drive primarily, then Street B should not be required within the proposed Development Plan.

**3. Consideration of requiring parkland/open space on the west side of Renfrew Drive**

*The City would not be requiring parkland/open space on the west side of Renfrew Drive opposite J Addison school. The City does not typically plan for parks/open spaces adjacent to employment/future employment areas. Should the Draft Plan of Subdivision application be approved, Staff will be requiring a cash-in-lieu of parkland dedication payment as a condition of approval and pursuant to the Planning Act.*

**Response** The Planning Act provides for a 2% parkland contribution for non-residential development. Staff has indicated that “*The City does not typically plan for parks/open spaces adjacent to employment/future employment areas*”. This does not preclude the City from having part of the 2% taken as actual parkland to add as an amenity to the area, especially given the fact that proposed Building 8 is not connected to the main part of the Proposed Development Plan. J Addison School on Renfrew Drive, immediately across from the Building 8 site, hosts boarders throughout the school year and would benefit from parkland in the immediate vicinity, which could also be utilized by nearby employees and customers of the area. The money received through a cash-in-lieu payment is unlikely to be spent in the area and would not provide any benefit to the existing community. This project represents an opportunity to plan for modest new park space in an area that currently has little if any, and the redevelopment

area of the Buttonville Airport site is a very large one that can easily accommodate such a provision.

#### **4. Concerns raised about not requiring a Secondary Plan for the Subject Lands**

*Staff opine that as the overall development concept reverted to employment uses under one ownership, Planning Staff deemed that a secondary plan process is unnecessary at this time and that land use matters can be appropriately addressed through site-specific OPA and Draft Plan of Subdivision. In addition, the 2014 MOP policies and the (former) Regional OP policies relating to Buttonville both refer to a Secondary Plan being needed for a “future land use” other than Employment uses on the Subject Lands. Specifically, the Regional OP notes that “When airport operations at the Buttonville Airport cease, the significant majority of the subject lands shall be retained for business park use, and the balance for a mix of urban uses”. Since a mix of urban uses is no longer contemplated, the Owner is proceeding with the underlying Business Park Employment designation of the 2014 MOP.*

**Response:** It appears that the Regional Plan policy that staff cite in this part of the report is policy 6.3.6.7, included below:

*That the Toronto Buttonville Municipal Airport lands are designated for business park use in the City of Markham Official Plan, including permission to operate an airport. When airport operations at the Buttonville Airport cease, the significant majority of the subject lands shall be retained for business park use, and the balance for a mix of urban uses. The City of Markham, in consultation with York*

*Region, will determine the details of the final extent of employment designation through an implementing secondary plan process. The re-use of the Airport site is intended to generate a range of quality employment opportunities and expand upon the number of jobs planned for the site.*

The Regional Official Plan policy makes no reference to not requiring a Secondary Plan if only employment uses are provided for on the site. It states that the City of Markham and Region of York will determine the details of the final extent of employment designation on the lands through an implementing secondary plan process. Even if all of the lands are ultimately used for employment uses, the policy states that the extent of the designation should be determined via a Secondary Plan process.

If it is determined that a Secondary Plan is not required for this large land area proposed for over 2,638,000 million square feet of development, at a minimum it would be appropriate for Comprehensive Block Plan be prepared for this application that specifically addresses the Phasing of Development, modifications to the proposed land use and configuration of development blocks and an appropriate Transportation Plan that provides for a more direct connection from Sixteenth Avenue, through the site to Allstate Parkway.

## **DETAILED COMMENTS ON PROPOSED PLANNING INSTRUMENTS**

We have reviewed the planning instruments attached to the subject Staff Report and have the following comments:

Appendix 'A': Draft Official Plan Amendment, 2014 MOP. In Part I of the Amendment, under Section 3.0 PURPOSE of this proposed OPA, the purpose is indicated to be to facilitate the redevelopment of the Subject Lands for employment and industrial uses

without the need for a secondary plan or comprehensive block plan at future stages of the planning process. The amendment cleans up the road network on Maps 10 and 11 of the City's 2010 Official Plan Schedules 10 and 11 respectively.

It is not appropriate and fundamentally wrong to eliminate the need for a secondary plan or comprehensive block plan for the reasons noted above.

There also is no justification provided for eliminating the proposed Major Collector Road identified as the connection from Sixteenth Avenue to Allstate Parkway through the proposed new Employment Area and Business Park and replacing it with the added Minor Collector Road (Street B), proposed amendment 1.2.

In Part II of the Amendment, under 1.0 there are errors in the text with reference to the Schedule Numbers.

1.1 Map 3 – Land Use of the Official Plan 2014, as amended is shown on Schedule

A. The referenced Map 3 Land use Schedule is identified as **Schedule B** to Official Plan Amendment No. xx.

1.2 Map 10 - Road Network of the Official Plan 2014, as amended, is shown on

Schedule B. The referenced Map 10 – Road network is identified as **Schedule C** to Official Plan Amendment No. xx.

1.3 Map 11 – Minor Collector Road Network of the Official Plan 2014, as amended,

is shown on Schedule C. The referenced Map 11 – Road Network does not have the term referencing any **Schedule \_\_** to Official Plan Amendment No. xx.

In addition to these errors, we do not agree with section 1.6, referencing the deletion and replacement of Policies 9.4.5 and 9.4.5.1 that indicate “a secondary plan will not be

required prior to redevelopment of the Buttonville Municipal Airport” and that “a comprehensive block plan shall not be required for site-specific development applications (including zoning by-law amendments and site plan approval)”.

Appendix 'B': Amendment to City of Markham Official Plan (Revised 1987)

No comments

Appendix 'C' Bylaw 2024-XXX

On SCHEDULE “A” TO BY-LAW 2024-XXX the identified road connection (Street B) to Renfrew Drive from the new north/south road (Street A) should be deleted, based on our comments and recommendations.

Appendix 'D' Conditions of Draft Plan of Subdivision Approval

There are many errors in the text of the Conditions, including:

2.4 – this references Street 2 (Street C) and Street 1 (Street D). The subject Draft Plan of Subdivision, Figure No. 5, attached to the Staff Report and dated 09/03/2025, contains only Street A and Street B. There is no Street C or Street D.

2.5 - this again references Street 2 (Street C) and Street 1 (Street D). The subject Draft Plan of Subdivision, Figure No. 5, attached to the Staff Report and dated 09/03/2025, contains only Street A and Street B. There is no Street C or Street D.

2.7 – this again references Street 1 (Street D) as well as 4.0 m multi-use pathway within the north-south boulevards. This does not seem to relate to this Draft Plan of Subdivision. Once again, no Street D exists in this Plan.

2.8 – This references the connection of Street 3 to Vine Cliff Boulevard, modifications to the lay-by parking bay within the north boulevard along Vine Cliff Boulevard and coordination with Berczy Warden Holdings Inc. This does not seem to relate to the subject Draft Plan of Subdivision.

2.9 – This references residential driveways and public laneways which are not part of the Proposed Draft Plan of Subdivision.

2.10 – This indicates the requirement for demonstration plan for site plan Blocks 36, 37 and 38. These Blocks are not part of the subject Proposed Draft Plan of Subdivision.

13.0 refers to a Phasing Plan which, to date, we have not seen. Is one contemplated for this Plan?

16.6 – This refers to Fire Services identifying an access to the development noted as Allstate Parkway to Street B. Is that reference to Street A, since that appears to be the only link between the two roads.

13.18 – This indicates that the owner shall not permit their builders to charge home purchasers for the items listed in Condition 13.19. There are no homes being contemplated within this development and this Draft Plan of Subdivision, so this condition is not appropriate.

13.19 – These clauses relate to condition 13.18 for home purchasers which is not appropriate for this application.

13.21 to 13.23 – These conditions could be amended related to the potential provision of parkland as part of the 2% requirement under Section 51.1 of the Planning Act.

15.2 – Does this condition relate to residential purchasers. If so, it is not appropriate for this application.

15.6 – This references mail delivery to new homes. It is not appropriate for this application.

16.5 – This condition references Street C. There is no Street C on this Draft Plan.

16.22 – This condition references the Warden Avenue Right-of-Way. Warden Avenue is not located near this proposed development so the reference to it is unclear.

## **CONCLUSION**

We respectfully ask the Development Services Committee to consider and implement our requests through required changes to the proposed Planning Instruments attached to the Staff Report. These recommended changes are reasonable and minor, given the proposed 2,638,000 square foot project, better for the community, appropriate and represent good planning.

Respectfully Submitted By:

MPLAN Inc.



Michael S. Manett, MCIP RPP