

**Appendix B:**  
**City Planning Analysis and Directions**

**OVERALL DIRECTIONS**

Should City Council consent to a new casino in the C1 zone, City Planning suggests the following overall directions:

1. For a casino located in the C1 zone:
  - a. A scaled-back casino that does not exceed 1,500 slot machines and/or 400 live-dealer table games and is not to exceed a gaming floor area of 135,000 square feet and a total gross floor area of 175,000 square feet inclusive of casino-related back of house functions and lobby areas;
  - b. The development will have an urban form that is designed to fit within its local context, which could include distributing the casino floor area on multiple levels where appropriate;
  - c. Limited ancillary food/beverage and retail uses associated with a casino up to 100,000 square feet;
  - d. The provision of convention space to bring Toronto to within the top ten convention destinations in North America must be provided with a casino use and this should be secured through a legal agreement containing obligations to construct a convention centre prior to or commensurate with a new casino use;
  - e. Detailed directions as outlined in Section 4 of this appendix including general and study area specific conditions, relating to design, transportation, infrastructure and other potential uses proposed in association with a casino; and
  - f. That the Ontario Lottery and Gaming Corporation include the above conditions in its Request for Pre-Qualification, Request for Proposals and subsequent agreements.
2. That City Council not support the establishment of a new casino in the Port Lands area of the OLG C1 zone.
3. For a casino in the C2 zone, an expansion plan for the Woodbine casino, including additional slot machines and the introduction of live-dealer table games to support the international calibre race track at Woodbine in accordance with the directions identified in Section 4.
4. That City Council not support the establishment of a temporary casino in the OLG C1 zone.

5. Any new casino or expansion of existing facilities in the City of Toronto must comply with the City of Toronto's planning process, including Council approval, and that Provincial Ministerial Zoning Orders are not to be utilized.
6. When the OLG has selected a proponent, a report will be provided to the City which will include the minimum information prescribed in Section 4.4 – Council Intermediate Decision Requirements. The Final Consent submission will be assessed on whether the proposal proposes to or will achieve the City's conditions. The proponent agrees and acknowledges that the City's review of the Final Consent submission is preliminary. Additional requirements may be identified as part of the development review process.
7. Should City Council issue its intermediate decision and when the proponent submits development applications to the City, if the proposal does not adequately demonstrate that physical, transportation and infrastructure impacts are appropriately mitigated or that modifications proposed to mitigate impacts are not acceptable to the City Manager in consultation with the Chief Planner and Executive Director, City Planning, the OLG agrees to reduce the number of slot machines and table games accordingly, and the proponent agrees to reduce the size of the non-casino elements accordingly.

## INTRODUCTION

At the November 5, 2012 meeting of the Executive Committee, City staff were requested to report on the recommended and alternate locations for a new casino, including the size and type of facility required for those locations, as well as the possibility of a temporary casino in Toronto. The October 22, 2012 report from the City Manager presented at the November 5, 2012 Executive Committee meeting, provided, among other matters, information on the pros and cons of various gaming and development options and also identified two types of facilities that could be considered in a Toronto context:

- Integrated entertainment complexes which would include a casino, hotel, retail and restaurants and convention or meeting room space; and
- Standalone facilities, which would include casino gaming area and ancillary food/beverage establishments and retail.

The decision process on whether to host a new casino in the C1 zone, is stipulated in Ontario Regulation 81/12. While, the decision can be viewed as a land use decision, it is not based on a detailed proposal for a specific site accompanied by development applications submitted under the *Planning Act* with supporting documentation. *Planning Act* applications would include supporting documentation, like detailed transportation studies that would be reviewed by divisions and agencies and would assist staff in making recommendations to City Council on the appropriateness of a proposal (proposed uses, scale, form, density etc.) for a specific site. From a planning perspective, casino uses have significant city building implications which have to be understood both at a citywide level and an area specific basis. The casino decision process is further complicated by the fact that there are significant economic, financial and social considerations around casino uses that will also shape City Council's decision on this matter. These other considerations are dealt with in separate sections of the main report.

### *Citywide Analysis*

From a citywide perspective, the analysis assesses existing characteristics of the C1 and C2 zones, taking into account economic development priorities for the City, and specifically for the C1 and C2 zones in Toronto, and other potential uses that could be leveraged in an integrated entertainment complex. Introducing a new casino in Toronto cannot be separated from acknowledging the role of the current casino use that exists in the C2 zone at Woodbine. This informs the suggested strategy for casino uses from a citywide perspective should Council consent to new casino uses.

Furthermore, City Planning's analysis assesses casino uses from the perspective of consistency with the Official Plan, other land use objectives, fit as it relates to the size and scale of the casino as suggested by the OLG, design considerations and transportation. City Planning staff sought to gain a better understanding from the OLG on their approach to casino modernization within the C1 and C2 zones to assess and provide direction on the size and form of a new casino, including other associated uses, in the absence of a development application for a specific site.

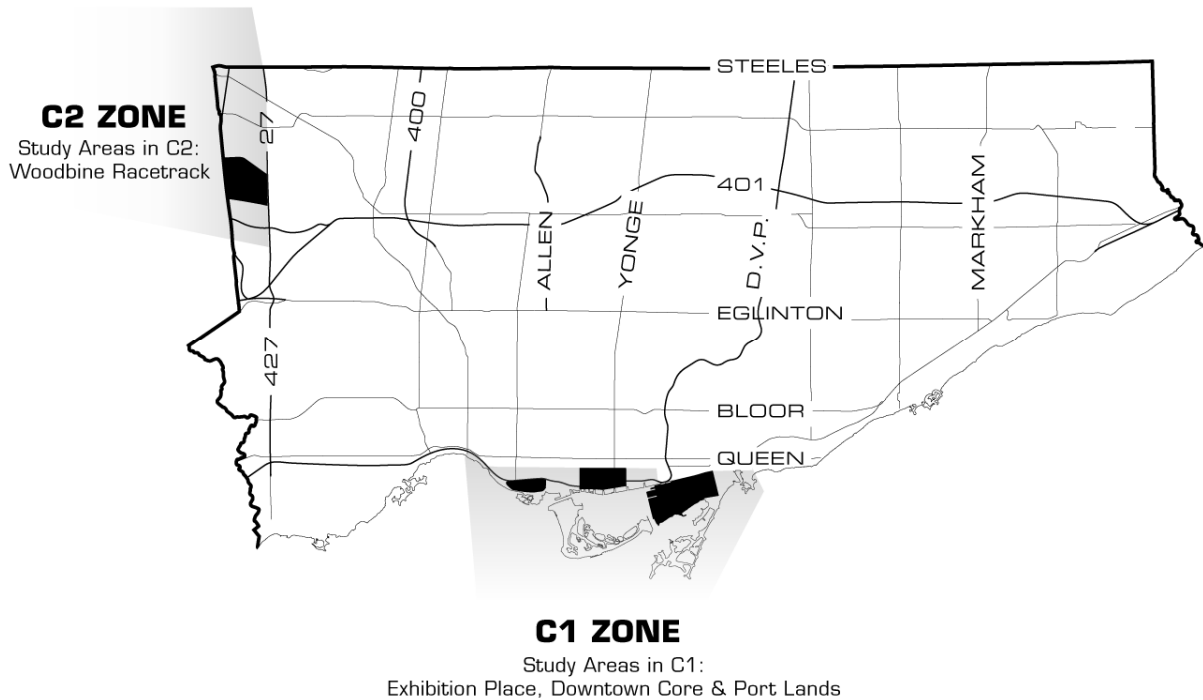
A review of international examples and other research has been undertaken to inform the review. City Planning staff surveyed information available regarding a range of existing and proposed international casino complexes to gain a better understanding of types of facilities, size, other components and location.. For some casino complexes, more information was available (staff reports, planning rationale, traffic studies, floor plans etc.) and this was reviewed in detail. City Planning staff also contacted planning staff in other cities and discussed their experience with casinos.

### *Study Area Analysis*

In addition, a more detailed review of "study areas" in the C1 zone was undertaken to provide advice on possible locations that may or may not be appropriate for a new casino use should Council decide to host a new casino in the C1 zone. A more detailed review of Woodbine (C2 zone) was also undertaken to better understand the role of this facility and existing casino use. Figure 1 identifies the study areas. The study area analysis was completed in consultation with other City Divisions, and discussions with Toronto Transit Commission and Metrolinx staff. City Planning staff also met with other stakeholders like Waterfront Toronto and the Canadian National Exhibition.

The detailed study area review identified opportunities and challenges of introducing a casino use within the C1 zone and expanding existing facilities in the C2 zone, with this information presented to the public during the consultation. The analysis focused on five themes: existing planning framework, urban fabric, placemaking/public realm, transportation and infrastructure. This report expands on the opportunity and challenges analysis to further define possible requirements for considering a new casino use within suitable areas, recognizing that the form and scale of a new casino facility may vary depending on the specific locational context and in keeping with a citywide strategy for these uses.

**Figure 1: Study Areas in the C1 and C2 zones in Toronto**



This appendix is organized as follows:

- **Section 1: Citywide Analysis:**
  - **OLG Modernization and Facility Components** summarizes the premise with which the OLG is approaching casino modernization in Toronto including their assumptions for the proposed new casino in the C1 zone and the operating premise for the C2 zone.
  - **Planning Response to OLG's Casino Proposal** provides an assessment of OLG's casino proposal from a planning perspective and addresses: consistency with the Official Plan, size and scale of the proposal, design considerations and transportation impacts. It also discusses the suitability of standalone casinos and suggests directions for the C1 and C2 zones should Council consent to host a new casino in the C1 zone and expand the existing facility at Woodbine.
- **Section 2 - Study Area Analysis:**
  - Outlines the findings for each of the C1 zone study areas which include: the downtown core study area, the Port Lands and Exhibition Place and provides site specific directions for the study areas suitable for a new casino. City Planning's study area analysis for Woodbine is also addressed.

- **Section 3 – City Planning Approval Process and Temporary Casinos:**
  - Outlines planning implications related to the potential for a **temporary casino**, should Council consent to host a casino in the C1 zone, and an overview of the **planning approvals process** for the study areas is also addressed.
- **Section 4 – Planning Directions:**
  - **Detailed directions** are suggested that would apply both more generally, for specific areas suitable for a new casino and for expansion at Woodbine.

## 1. CITYWIDE ANALYSIS

### 1.1. OLG Modernization and Facility Components

The sample casino square footage estimates provided by Ernst and Young, which were included in the October 22, 2012 report to the Executive Committee, were based on information provided by OLG, models from other locations, industry input and assumed an integrated entertainment complex in the C1 zone. The estimates suggested the following components for a facility in the C1 zone:

- gaming operations (300,000 ft<sup>2</sup>) with 3,500 to 4,500 slots and 200-300 tables;
- hotel (800 rooms);
- convention space (300,000 ft<sup>2</sup>); and
- hospitality, retail and entertainment (450,000 ft<sup>2</sup>).

City Planning staff sought to understand the premise with which OLG is approaching "casino modernization", and whether the approach and anticipated components for the C1 zone is consistent with the Ernst and Young sample estimates. Further, to analyze potential impacts, like transportation and built form integration, and develop appropriate directions in the absence of a specific development proposal, staff needed a more in depth understanding of the OLG's intentions with respect to a new casino in the C1 zone. As such, staff met with the OLG on several occasions to obtain additional information regarding their assumptions for the proposed new casino in the C1 zone as well as intentions with respect to the C2 zone.

The materials issued with respect to the OLG's modernization plan for potential facility sizes in the C1 and C2 zones suggested 5,000 slots in either the C1 or C2 zone, but not both. Clarification received from the OLG has the total proposed number of slot machines for the C1 and C2 zones to equal the current allotment at Woodbine, which has approximately 3,000 slot machines, plus 5,000 new slot machines in the C1 zone for a total of 8,000 slots in Toronto.

The OLG provided an overview to City staff regarding their approach in determining the numbers of slots, explaining their gravitational modelling of carded play at existing casinos in Ontario to evaluate unmet market demand. They used this to apportion Ontario geography into the 29 land based casino zones to determine where to best maximize market, revenue and future profitability opportunities. The gravitational model, as understood by staff, is a spatial-interaction model that predicts customer behaviour, travel time (1 to 2 hours) and has been used

by the OLG to forecast revenues in the 29 zones. For the C1 zone, their model also takes into account convention visitors. Through discussions with operators that responded to the OLG's RFI, as well as benchmarks from existing facilities, the OLG also determined possible tourist and VIP play.

#### *OLG's Operating Premise for Woodbine (C2)*

The OLG has indicated that their operating premise for Woodbine is that the slot casino will remain, with the potential addition of some table games. The OLG would issue an RFP to seek an operator for the existing casino facility at Woodbine. This would be subject to negotiations with Woodbine – the current landlord. The OLG has identified that municipal consent by Toronto under Ontario Regulation 81/12 for the expansion of the existing facility is not required. However, Council should pass a resolution indicating its support to expand the existing facility to allow for live-dealer table games at Woodbine.

The OLG has indicated that they are not targeting an integrated entertainment complex opportunity in the C2 zone, notwithstanding the current approved plans for such an urban entertainment and retail facility at Woodbine. The OLG would issue a Request for Pre-Qualification (RFPQ) and Request for Proposal (RFP) for Woodbine to find a suitable operator for the existing casino facility (3,000 slot machines). Should the advent of an enhanced casino (slot machines and live-dealer table games) occur at Woodbine in lock step with a developer taking up the approved urban entertainment and retail planning permission, it will be a result of market driven factors and not because it was encouraged by the OLG.

#### *OLG's Operating Premise for Toronto's Downtown Area (C1)*

The operating premise from the OLG for the C1 zone is that a large, integrated entertainment complex is the best approach from a casino expansion perspective for Ontario as part of their modernization program. If a casino in the C1 zone is not consented to by the City of Toronto, the OLG has identified other areas in the GTA, but just outside Toronto, within the C1 zone where an integrated entertainment complex could be located.

The OLG has identified a range of attributes that the integrated entertainment complex could include (hotel, food and beverage, retail, entertainment, convention space, back of house, lobby and parking), but prefers to leave the final program details to potential proponents and the future RFP for the C1 zone. Upon review of the RFPQ issued by the OLG for the City of Ottawa, it is understood that the size and type of amenities like hotel and convention space could be provided at the discretion of the selected proponent, and likewise, the proponent would retain all proceeds from these different amenities and operations. Municipal planning approvals would still be required for the final proposed mix of uses and ultimate development proposal.

Based on the OLGs overview of its gravitational model, the OLG is suggesting a casino model for the C1 zone that consists of between 3,500 to 5,000 slots and 200-300 tables, resulting in a casino gaming floor area of 150,000-250,000 square feet, excluding back of house functions. The OLG provided specific assumptions for floor area for each slot position (30 ft<sup>2</sup> per slot machine) as well as floor area requirements for table games (225 ft<sup>2</sup> per table game). It is important to note that while the OLG provided their requirements for slot machines and table games, there appears

to be no industry standard. Restaurant (100,000 to 150,000 square feet) and hotel space (800-1200 rooms) would be sized to support the total casino gaming floor.

Additionally, the OLG has identified that a theatre with 3,000 to 6,000 seats could be accommodated based on slot and table positions. The OLG has also identified that a certain amount of retail (500,000 to 700,000 square feet) and convention centre space (600,000 to 1,000,000 square feet) may be feasible. The OLG also identified requirements for other building functions (250,000 to 300,000 square feet) related to a large, integrated resort complex, like hotel lobby, box office, back of house functions etc. They noted they looked at large international resort complexes to inform the assumptions regarding these uses, as well as input received from potential operators through their RFI.

With respect to location, the OLG identified they prefer to see the final specific site in the C1 zone identified by potential proponents, and not identified by the City or the OLG. The proponents will be responsible for securing a site to OLG's satisfaction as part of the RFP process.

The OLG has also indicated that the clearer the City is with respect to its intentions for a new casino in the C1 zone, the clearer the OLG is able to be in the RFP it will issue to select a preferred proponent. Based on discussions with the OLG, they are committed to having a new casino use satisfying a host city's development approval processes and as such are also seeking a better understanding of the planning frameworks in place and development objectives for respective zones.

While the OLG's approach looks at the city through two separate zones, City staff have looked at both zones together to inform the analysis and to develop a citywide approach for casino uses that aligns more directly with Toronto's opportunities and challenges.

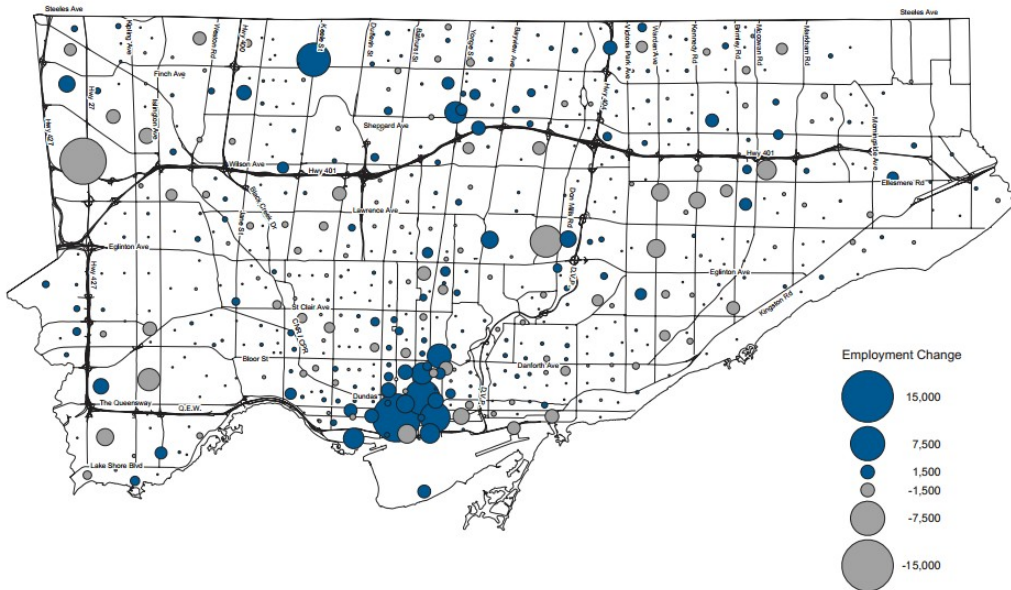
## **1.2. Planning Response to OLG's Casino Proposal**

Toronto is a large, complex mature urban centre that continues to grow through intensification, rebuilding and reurbanization. It is a diverse and dynamic city with a range of land uses and activities. However growth is not distributed evenly across the City. Figure 1 highlights the employment change between 2001 and 2011. Toronto's downtown area continues to grow and has strong residential and office development, with 45% of the residential units and 31% of the non-residential gross floor area proposed in the City. Other areas are experiencing a decline in jobs.

Toronto's downtown area is a healthy, vibrant and cosmopolitan area supporting the City's fastest growing neighbourhoods and is home to one third of Toronto's jobs. It is a highly complex area that has a broad range of uses. It has the largest office node in Canada and the fourth largest office market in North America. It also has the largest concentration of health services and medical research institutions in Canada; several post secondary institutions; many of the GTA's, Ontario's and Canada's premier cultural institutions and tourist attractions; major sports venues; significant retail and entertainment uses; and regional transportation

infrastructure, all amid a growing residential population. Toronto’s downtown area also has some of the City’s most iconic and architecturally significant buildings.

**Figure 2: Employment Change in Toronto Between 2001 and 2011**



In this context, it is City Planning's opinion that a new casino is not an essential land use in Toronto's downtown area – essential meaning vitally important for revitalizing the area or fundamental to sustain what is widely perceived to be one of the most successful downtowns in North America. That being said, many of the uses located in Toronto’s downtown area are similarly not essential land uses, but contribute to the overall experience and diversity of the City.

Where some North American cities, like Detroit, Cleveland and Baltimore, have embraced casinos as a strategy to assist in revitalizing their languishing downtown areas and to stimulate economic development and recovery, this is not required in Toronto's downtown area. The diversity of Toronto’s downtown area has assisted in protecting it against sectoral recessions and trends. But it is also this diversity which defines Toronto’s downtown character and urban lifestyle appeal. The introduction of a significant new use like a casino that could disrupt this dynamic must be carefully considered. A 150,000 to 250,000 square foot casino with up to 5,000 slot machines within a resort-styled integrated complex, as proposed by the OLG, would be out of character with Toronto's downtown area. A scaled-back casino within an urban, mixed-use complex would be a more suitable fit.

In contrast to the City’s downtown area, the North Etobicoke area where Woodbine is located would benefit from economic development and job growth. Compared with Toronto as a whole it has relatively high unemployment levels, relatively lower income levels, a high proportion of lone-parent families and a high proportion of at-risk youth. While the area has traditionally had a solid manufacturing base, between 2001 and 2011 the area north of Eglinton and west of the Humber lost 14,300 jobs (16.8%). Rexdale and Northwest Etobicoke lost 8,100 jobs (13.6%).



Woodbine Entertainment Group (WEG), which owns and operates the racetrack at Woodbine, advises that it is the largest horse racing operator in Canada, and is a key economic driver of horse breeding and racing, the second largest agricultural industry in the Province. The sector generates over 60,000 direct and indirect jobs that account for \$1.6 billion in wages and salaries. WEG is also one of the largest employers in North Etobicoke, providing 7,055 full-time equivalent jobs citywide and over 5,000 full-time equivalent jobs in the surrounding area.

Slot machines were introduced to Woodbine in 2000 and are operated by the OLG. The slot machines were permitted through a Ministerial Zoning Order (668/98) as part of the slots-at-racetrack program. WEG, in partnership with the OLG, recently invested \$100 million in an expansion to the gaming area which opened on December 15, 2012.

The City approved a development concept for 112 hectares of the site's 266 hectares in 2007. The concept consists of 3.5 million square feet of mixed-use development for a "destination retail/entertainment" project that builds upon and supplements the horse racing operation and includes a hotel, restaurants, theatres, a live performance venue, office uses and associated amenities. Phase 1 of the proposal would create a regional entertainment tourist destination that expands on the existing racetrack and gaming facility. Phase 2 would see the development of approximately 2,500 residential units and supporting commercial uses.

The approved development concept was a key component of WEG's financial strategy to maintain the economic viability and competitive position of its existing operation. The development concept was intended to diversify its revenue base and allow the expansion of its racing and breeding operations. WEG expected more people will visit the racetrack, resulting in increased revenue which would ultimately help to sustain the horse racing facility and the sectors of the rural economy that depend on it. At the time of the approval of the development concept, it was projected that the project would provide an estimated 9,400 jobs and generate indirect employment opportunities in the surrounding area.

Sustaining and expanding the casino use at Woodbine could assist in redeveloping the area in accordance with the approved plans and create new employment opportunities. This strategy is not required in the C1 zone and as such is not a necessity for continued economic development in Toronto's downtown area.

### **1.3. Conformity with the Official Plan**

Land use decisions made under the *Planning Act* are required to conform to a city's official plan, the long-term vision for how a city should grow. The City's Official Plan sets out an urban structure, including identifying areas of growth. It identifies the importance of providing a diversity of land uses across the City and then utilizes land use designations to provide more specific direction to the appropriateness of certain types of uses in certain areas. The Plan does not specifically identify casinos as a land use, but also does not restrict them.

The City's *Mixed Use Areas* designation identifies that these areas are to provide a broad array of uses such as residential, office, retail and services, entertainment and cultural activities. Also identified as growth areas, expected development intensity in the *Mixed Use Areas* is typically

context dependent, or may be driven by more detailed Secondary Plan policies where applicable. Similar to *Mixed Use Areas*, *Regeneration Areas* are areas requiring revitalization and reintegration and are to provide for a broad range of uses. Prior to permitting new development in areas designated *Regeneration Areas*, Secondary Plans are to be developed to guide revitalization and ensure orderly development.

A new casino located in Toronto is regarded as an entertainment use and as such could be located in areas designated as *Mixed Use Areas* and potentially some areas designated as *Regeneration Areas*, subject to satisfying other development criteria, such as achieving an appropriate scale and form, both from a more general perspective as well as for specific areas. A casino use in other designations identified in the Official Plan would not be appropriate.

While Woodbine is designated as an *Employment Area*, the Site and Area Specific Official Plan policy, approved in 2007, that applies to these lands, provided a comprehensive vision to permit 3.5 million square feet of entertainment, commercial and residential uses on 276 acres of land to create a new regional entertainment tourism destination and residential district. The expansion of the casino use at Woodbine would be permitted in the Official Plan.

### **Other Uses Associated with an Integrated Entertainment Complex**

As previously noted, the types of uses contemplated by the OLG within their proposed large, integrated entertainment resort complex for the C1 zone includes convention centre space, significant retail, food and beverage, a large entertainment event space/theatre and a hotel component. An overview of the key considerations for these uses is provided below, recognizing that the approach to these uses may differ depending on the particular study area and/or a specific site within a study area.

Other uses typically associated with integrated entertainment complexes could assist in achieving the City's mixed-use objectives for areas designated *Mixed Use Areas and Regeneration Areas*. While the Plan does permit single use buildings in these areas, the provision of a mix of uses is positively viewed and encouraged to meet urban design, environmental and transportation objectives of the Plan. However, depending on the type of use and its scale, other uses typically associated with integrated entertainment complexes could potentially have positive or negative impacts on Toronto from an overall city building perspective. In any development, it is important to achieve the right mix of uses and scale and intensity of uses depending on the context of the site.

#### ***Convention Centre Space***

Expanded convention centre space is a key objective for increasing Toronto's competitiveness with other cities. Toronto's downtown area currently features two large event spaces, the Metro Toronto Convention Centre and the Direct Energy Centre. There is also the Toronto Congress Centre located close to the airport. Economic Development staff have identified that none of these facilities provides both the scale and the mix of exhibition and meeting space that is required by some of the largest conventions that deliver the most visitors as delegates. Expanding convention space to bring Toronto into the top ten for convention space in North America has the potential to attract new tourists and would be a key economic driver for the

City. When coupled with the breadth of uses and activities available in the Toronto's downtown area, Toronto could become a highly attractive destination for large international conventions. Additional benefits noted during the consultation include the potential for positive spin-offs for local businesses and hotels.

It is acknowledged that a convention centre use, especially one that positions Toronto to be competitive with other top-ranked North American facilities, requires the facility to be a considerable size. The built form impacts of a facility this size would be considerable if the majority of the building was located above grade, and likewise, difficult to integrate into the dense, urban fabric of Toronto's downtown area. A strategy for delivering the convention facility should be consistent with the strategy adopted in 1994 for the original expansion of the Metro Toronto Convention Centre. This strategy placed the majority of the building below grade, with a small at grade structure (20,000 square feet) located within Olympic Park. Alternatively, an incremental expansion to the existing facility in Exhibition Place can be accommodated within the planned expansion work undertaken by Exhibition Place.

### ***Entertainment Event Space/Theatre Space***

Arts and culture are central to a healthy and vibrant city. Cultural attractions offer leisure opportunities for the enjoyment of residents and attract visitors to the City. The City's Culture Plan identifies that Toronto's arts and culture assets are essential to Toronto's economic future as well as its quality of life. Feedback received during the consultation indicated a preference for the provision of new arts and culture venues.

The Official Plan speaks to keeping existing and creating new performance venues and that the arts and cultural activities will be promoted. Toronto has numerous performance venue spaces, with 16 venues with over 500 seats. While the Official Plan encourages new venues, ensuring the ongoing vitality of existing venues, including City operated and not-for-profit venues, as well as mitigating impacts like dispersal, requires careful consideration on where these facilities are located.

A smaller, focused entertainment venue could be accommodated, subject to demonstrating that existing venues would not be impacted and a strategy to deal with dispersal following an event would be required.

### ***Food and Beverage Establishments and Retail***

The Official Plan recognizes that new retail and service development of a significant scale must take into account the potential impact on existing shopping areas and patterns of retail activity. Typically, this would be assessed through the review of a development application. For instance, large retail developments in the City, like large-format retail in *Employment Areas*, are required to submit Retail and Market Area analyses to assess their impact on the employment function of the area and neighbouring retail. A casino use with a high ratio of retail and restaurant uses could impact existing retail and service areas. Limiting the size and providing further guidance on casino-related ancillary retail and service uses could reduce potential impacts and address concerns expressed during the consultation.

Food and beverage establishments as well as retail, especially if provided at grade with pedestrian entrances provided directly from municipal sidewalks, help to animate and activate public frontages. Official Plan policy provides the ability to limit the size of retail stores as well as requiring ground floor retail uses in new buildings.

### ***Hotel***

Toronto's downtown area is home to the City's largest concentration of hotel facilities. Hotel vacancy rates are lower than national averages and the hotel market is relatively healthy. The provision of new hotels could have positive benefits for the City and is important for enhancing tourism and attracting large events.

## **1.4. Size, Scale and Design Considerations**

The size and scale of new buildings and their uses is a key factor in determining the appropriateness of fit while understanding infrastructure and issues of impact. New development, irrespective of land use, needs to be sized and scaled to be compatible and harmonize with surrounding development and its planning framework to enhance the overall urban environment and implement the direction for change intended by the Official Plan.

The proposed size of a casino at 3,500-5,000 slots and 200-300 tables (150,000-250,000 square feet), as put forward by the OLG for the C1 zone, would be of a significant size, and potentially one of the largest slot facilities in the world next to the Foxwoods and Mohegun Sun casinos, both located in rural areas of Connecticut. The Foxwoods casino has approximately 6,300 slot machines and 372 table games with a total casino floor area of 344,000 square feet. The Mohegun Sun has approximately 6,425 slot machines and 372 table games with a total casino floor area of 350,000 square feet.

The ability to integrate a facility of up to 250,000 square feet in a dense, built up area of the city, like Toronto's downtown area, would be a significant challenge and could alter the diversity and appeal of the urban lifestyle and liveability that is key to this area's continued success. Moreover, the integrated, resort-styled complex contemplated by the OLG for the C1 zone would be similar to other large, integrated resort complexes found internationally in places like Singapore, Macao and Las Vegas. It would be comparable to two Yorkdale Shopping Centres.

It is acknowledged that Toronto's downtown area already has a number of large facilities, such as the Roger's Centre and the Eaton Centre to name a few. While these bring many people to the City's downtown area, are major destination attractions and contribute to the overall diversity of the city, their scale inhibits achieving the fine-grained appeal of many other parts of our downtown area. They dominate the blocks that they occupy and have been a challenge to integrate and design in a way that achieves many urban design goals. However, unlike a large casino, these uses are accessible to all Torontonians and contribute to the city's diversity, culture and entertainment amenity without major associated land use impacts. Ultimately they have had a proven track record when it comes to city building. In other parts of the Toronto's downtown area, such as Exhibition Place with its campus like setting and ability to host major festivals and events, maintaining or enhancing the existing character would prove equally difficult as a

significant resort-style casino development could fundamentally alter the character and bring unplanned land use impacts.

The introduction of new, unique large-scale uses in Toronto's downtown area should only be considered if they contribute to achieving broader city building objectives that better position Toronto nationally and globally without having to address unpredictable negative impacts. Many cities have embraced casinos. They are no longer only associated with Las Vegas. According to the American Gaming Association there are 22 states in the United States with legalized gambling. There are also at least 108 casinos already established in Canada. A casino in Toronto's downtown area is unlikely to advance Toronto's national and international position.

While there is potential to mitigate the impact of large-scaled facilities by requiring that the floor area be distributed on multiple storeys or including retail and service uses at grade, thereby lessening the overall impact at grade. A casino with the associated components of the size proposed by the OLG would still have a sizeable footprint and its presence and profile would dominate the lower storeys of a building which are the most critical in achieving a high-quality pedestrian environment. Moreover, mitigating other negative impacts, such as transportation demands and unintended consequences on existing retail shopping streets, entertainment and restaurant districts, would be more difficult to achieve, especially if the casino included a large food/beverage and retail component. Overall size would also limit reuse potential in the event such a facility would need to be repurposed.

#### *Woodbine*

The Woodbine lands, which underwent a master planning exercise through its development approvals, are generally comprised of large structures related to race track operations, surface parking lots, and large expanses of open space. Moreover, the facility is already host to a slot operation. The Woodbine lands are not without its challenges. It lacks a defined urban fabric and connections to the surrounding area. The proposed master plan and approved development framework address these problems within its specific location and context and in recognition of the intent of creating a major regional entertainment and retail hub. An expanded casino venue could be accommodated on the site consistent with the approved development framework. Phase 1 of the approved development concept focused on the development of a retail entertainment complex with approximately 1.2 million square feet of development.

#### *Lessons from International Precedents*

A review of integrated entertainment complexes internationally was undertaken by City Planning staff to gain a better understanding of the size and scale of the facility proposed by the OLG for the C1 zone as well as to gain a better understanding of positives and negatives of these facilities. There is no one casino format found through the review of international precedents that is perfectly suited to a downtown Toronto context. There are, however, important observations:

- **Large slot-focussed facilities are likely to attract regional visitors as opposed to an international clientele.** The OLGs gravitational model, as understood by City staff, anticipates this to be the case for the C1 facility, with less of a focus on attracting tourists nationally and internationally.

- **Large, integrated resort complexes would be more difficult to integrate into a dense, urban fabric.** The Foxwoods and Mohegun Sun casinos are located in rural areas on large plots of land. Impacts of these facilities on its surroundings are more limited due to their rural locations. Likewise the largest casino in the world – the Venetian Macao – with over 500,000 square feet of casino floor area, one million square feet of retail, food and beverage uses, and 2,900 hotel rooms – is located in an area designated and planned for casino resorts.
- **Some casinos and integrated entertainment complexes are located in mixed used districts that have residential uses.** The Star casino in Sydney, Australia and the Crown casino in Melbourne, Australia were both developed in what were underutilized industrial areas of their cities. These areas are now mixed-use districts with residential uses. The Crown Casino has 2,250 slots and 500 table games. The Starcity has 1,500 slots, 261 multi-terminal machines and 200 table games.
- **Casinos with large footprints in urban areas should be avoided.** The Crown Casino in Melbourne was developed in the late 1990s on underutilized industrial lands. When the original facility was constructed, it occupied a large super block with limited permeability. Planners in Melbourne have since recognized that the large block and footprint of the original building created an obstacle to creating a better street presence and improving walkability. This was also the case for other large developments that occurred in the area (the exhibition centre and Victorian College of Arts). The majority of active uses at grade are also focused on the waterfront rather than all public frontages. Reducing the size of the facility proposed by the OLG and distributing the casino gaming floor on multiple levels would assist in minimizing built form impacts and improving opportunities for an enhanced public realm.

### *Design Considerations*

Ensuring new development is of a high-quality design commensurate with the fabric of the City is a key objective of the Official Plan. Throughout the consultations, City staff heard that part of the public's concern with casinos is that they are an insular use that is inwardly focused that do little to enhance their surroundings. Through precedent research, many casinos and resort complexes which exist in Ontario, nationally and internationally exhibit these characteristics. This would not be appropriate for new development in Toronto. The integrated entertainment resort complexes in Ontario would also not be an appropriate model. This type of facility would not fit in Toronto's downtown area for similar reasons and would not enhance the overall urban experience. Based on the discussions with the OLG, a much larger integrated resort complex than have been developed in Windsor or Niagara is under consideration for Toronto which is not suitable.

Precedent research demonstrates, however, that the casino floor itself is markedly flexible and nothing prevents this use from providing an outward expression or as noted previously for the use to be provided in multiple storeys. Casinos generally have a flexible floor layout, typified by large open areas that accommodate table games and slot machines. There is usually some back of house functions like offices and cashier areas that also need to be accommodated.

Some new and planned casinos are adopting design standards that move away from shutting off patrons from natural light. Rivers in Des Plaines, Illinois, has both windows and skylights and the planned casino in Baltimore, Maryland, – Harrah's – is a two storey building with glazing and plazas along the public frontages. While this can be seen as design progress, these facilities

continue to maintain a more suburban, land-consumptive, auto-oriented design which would not be appropriate in a Toronto context.

There are also examples of more urban complexes and expansions to casinos that are being developed. These have animated street frontages with shops, restaurants, bars and cafes along the street. They also have their parking below grade and are integrated with transit. Adaptive re-use of existing buildings have also been used to house casinos. A new casino in Cleveland, Ohio recently opened which is located within the lower floors of a historic building. London, England has 24 casinos which are generally smaller facilities integrated into existing historic buildings and the expansion of the casino in Sydney, Australia provided active uses at grade and an enhanced pedestrian realm.

Should Council consent to a new casino, addressing the insular and inwardly focused nature that casinos have in the past exhibited is possible through conditioning the consent and ensuring appropriate design measures.

#### *Creating a Distinct Profile*

A casino in Toronto's downtown area should be appropriately-sized for a downtown context with a high-quality design that achieves the City's built form and public realm objectives. The facility should be distinct from other casinos and integrated entertainment complexes to ensure that Toronto's downtown area continues to be diverse and attractive for the wide range of activities and uses which make the area so successful.

Many comments during the consultation focussed on the potential adverse impact of casinos on the reputation and image of the city. A reduced profile, which is distinguishable and carefully calibrated through both scale and design, is a preferred approach. An approach which minimizes slot machines in contrast to other large casinos and focuses on live-dealer table games could help address this concern and would assist in differentiating a new facility from other casinos in Ontario and North America.

The research of casinos and integrated entertainment complexes internationally undertaken by City Planning reinforces the importance of achieving a distinct profile for a new casino in Toronto's downtown area. There are a vast number of casinos in the world, ranging from the small facilities dispersed throughout London or the small casino on Barcelona's waterfront (219 slot machines and 52 table games), to more urban, moderately-sized casinos in cities like Auckland (1,647 slot machines and 110 table games) and Sydney (1,500 slot machines, 261 Multi-terminal gaming machines and 202 table games) to the larger casinos located in resort areas like Las Vegas (e.g. the Venetian with 2,186 slot machines and 230 table games), Singapore (2,500 slot machines and 600 table games), Atlantic City (e.g. the Borgata at 3,305 slot machines and 258 table games) and Macao (e.g. the Wynn Macao at 939 slot machines and 504 table games or the Venetian Macao with 2,219 slot machines and 520 table games).

A casino in the C1 zone which blends aspects from these different facilities could assist in differentiating it. City Planning staff suggest that a more modest profile would be better suited to a downtown Toronto context. This would include:

- Providing an emphasis on table games, while at the same time not exceeding the amount of table games in some of the larger resort complexes in Australia (Crown Casino with 500 table games), Singapore (600 table games) or the Macao resorts which typically have more table games; and
- Significantly decreasing the number of slot machines as proposed by the OLG to be more inline with the number of slot machines in places like Auckland (1,647 slot machines) or Sydney (1,500 slot machines).

## **1.5. Transportation**

A new casino use in Toronto's downtown area, as contemplated by the OLG requires a strategic approach to dealing with parking and transportation, due to the auto-oriented travel behaviour of casino patrons and the policies of the City to encourage transit use and minimize auto use. Moreover, feedback received during the consultation indicated that the primary challenge for a casino in Toronto's downtown area was the management of traffic congestion, additional transit needs and additional parking facilities. The approach City staff have taken in the analysis considers experience from other jurisdictions, as well as the characteristics that are unique to Toronto and the potential study areas within the C1 zone that are under consideration.

From an overall transportation perspective, casinos generally exhibit a high auto mode preference by patrons. This is partly related to the fact that casinos have traditionally been located in low-density areas with limited transit service, and large parking areas that are generally free of charge. The transportation solution for a potential casino requires an approach that reflects the characteristics of the different areas of the City. A key factor is that the lowest auto use and parking demand occurs in Toronto's downtown area. It is well served by transit, but is also constrained by congestion at certain key times. These factors, as well as the mixed land use and opportunities for shared trips, all combine to influence travel behaviour.

The City's Draft Citywide Zoning By-law includes a parking rate of 25 spaces for each 100 square metres of a "gaming establishment". "Gaming establishment" is defined in the draft by-law, but the land use is not permitted in any proposed zones. Moreover, this single rate applies to all areas of the City. For most other uses, the Draft Citywide By-law has established five separate categories for parking standards based on the City's growth areas and depending on proximity to transit. This approach allows for lower parking rates in higher intensity and transit accessible areas. No separate parking study was conducted to determine the parking rate in the Draft Citywide Zoning By-law for a "gaming establishment". If a new casino was contemplated in the C1 zone, this parking ratio would need to be reviewed in concert with a specific proposal.

A preliminary parking approach was developed to gain a better understanding of the potential parking demand from a new casino in Toronto's downtown area. This approach utilizes the Draft Citywide By-law's rate as a starting point. For the purposes of this evaluation and in the absence of a detailed transportation and parking study, the Draft Citywide By-law's rate is considered to represent, more or less, an unconstrained demand for parking. In the context of discussing the study areas under consideration in the C1 zone, the parking rate has been adjusted to reflect the local transportation characteristics, including modal split patterns, transit service, land use patterns, the potential for shared trips, shared parking opportunities, among others.



The size of the casino suggested by the OLG (150,000-250,000 square feet of gaming area) would likely have significant transportation impacts. These impacts will be more significant in a constrained environment such as Toronto's downtown area, and would include pedestrian congestion, tour bus operations, taxi queuing, pick-up/drop-off areas, parking and traffic.

A preliminary assessment of parking for a casino within the range suggested by the OLG has been conducted utilizing the City's Draft Citywide Zoning By-law requirement of 25 spaces for each 100 square metres of a "gaming establishment" as a starting point. This rate was then adjusted to reflect the automobile mode share in a particular area and the auto oriented characteristic of casinos. In the case of the downtown core study area, 30% of all trips into the area over 24 hours are made by automobile drivers. This rate is adjusted to 50% (subject to further evaluation) to reflect the behaviour patterns of casino patrons. In the case of Exhibition Place the auto mode for a casino is estimated to be 70%, with a higher auto mode for the Port Lands. Applying this approach, the following table summarizes the preliminary parking estimates as a range for an OLG sized casino (150,000 to 250,000 square feet) in the three study areas.

#### **Estimated Parking for OLG Proposal**

	Gaming Floor Area* (square feet)		Parking Spaces Required	
	Low	High	Low	High
<b>OLG Casino</b>	150,000	250,000	1,740	5,000
*Gaming floor area excludes back of house functions				

Opportunities to minimize and manage the transportation impacts associated with a new casino start with reducing the proposed scale. The transportation assessments for the specific study areas detailed in Section 2 of this appendix are preliminary. The City would require a Transportation Impact Study should Council consent to a new casino in the C1 zone to assess the details of a proposed development, and the required mitigation measures. A Transportation Demand Management (TDM) plan would also be required in conjunction with an application. The purpose of the TDM plan is to outline a design and programming strategy to minimize the number of discretionary vehicle trips generated by the project, and to encourage travel by other modes. This could include measures to discourage peak hour travel, vehicle trip sharing strategies, variable parking pricing, parking reductions, transit use incentives, pedestrian connection improvements, transit improvements, shuttle bus services, tour bus management, etc.

It is important to note that there may be additional parking required for other uses, such as new convention space or hotel. City Planning staff would rely on the submission of a development application to comprehensively review a proposal and to manage parking and travel demand.

#### *Transit*

City Planning staff consulted with the Toronto Transit Commission (TTC) on potential transit upgrades that may be required should City Council consent to a new casino. The TTC advises that all of the study areas are currently provided with local transit service. The TTC would increase these services as required to serve any increase in ridership that would be generated by

a casino (employees and visitors). This could be funded through normal transit fare revenue and on-going City subsidies for transit operations.

The TTC also advises that capital upgrades for higher order transit (LRT or subway) to service a new casino development are likely not required from a ridership perspective. Should a proponent want to expand higher-order transit to service their development, this would be done at the proponent's discretion and funded entirely by the proponent. Moreover, any expansion should not detract from other citywide transit expansion programs.

There are well-studied transit expansion projects (LRT) associated with three of the study areas. The costs are in the range of \$250M to \$600M. An extension of the Finch West LRT is estimated to cost \$250M, the Bremner LRT to Exhibition Place \$550M and the Portlands LRT via East Bayfront at over \$500M (excludes other infrastructure costs like new bridge crossings).

## **1.6. Standalone Casinos**

The October 22, 2012 Executive Committee report identified that Council could decide to host a standalone casino only. The report noted that while this type of project would generate lower total revenues, casino patrons may seek services in the surrounding area, like hotels and restaurants. Notwithstanding this approach, there would still be some on site restaurant and retail space provided in a standalone casino as is found in other standalone casinos in North America. Ancillary retail and restaurant uses are generally already permitted as-of-right in existing By-laws.

In the general downtown core, a stand-alone casino is neither practical, nor desirable. Recognizing the distinct character of the Exhibition Place grounds, a new casino may manifest itself differently given the area is an entertainment district within a campus-like setting. In all other locations, a standalone casino would compromise the City's mixed-use objectives.

## **1.7. Summary**

A new casino use in Toronto's downtown area is not required from a land use planning perspective or as a revitalization mechanism. A casino as contemplated by the OLG in the City's downtown area would have significant negative impacts and could detract from the diversity and appeal of a widely praised urban lifestyle that is key to the area's continued success. In summary:

- A casino in Toronto's downtown area (C1 zone) is not required or important for revitalizing this area or fundamental to sustain what is perceived to be one of the most successful downtowns in North America. As such, a casino is not an essential land use for Toronto's downtown area. While many of the land uses located in Toronto's downtown area are not essential, they do contribute to the overall experience and diversity of the City;
- A casino in the C1 zone is not comparable to high impact and high value land uses that internationally ranked cities seek out and are measured against; a large downtown casino is unlikely to advance Toronto's international ranking, especially considering casinos are more prevalent and becoming more common in cities;

- A casino located in the C1 zone is an entertainment use and could be located in areas designated as *Mixed Use Areas*, and potentially some areas designated as *Regeneration Areas*, subject to satisfying other development criteria (i.e. appropriate form and scale);
- A casino with 150,000 - 250,000 square feet of casino gaming floor with up to 5,000 slot machines and 300 tables as proposed by the OLG would have significant negative impacts and could detract from the diversity and appeal of the City's *Downtown and Central Waterfront* character that is key to the City's continued success;
- A casino gaming floor area of between 150,000 - 250,000 square feet with up to 5,000 slot machines and 300 tables would dominate and destabilize the character of surrounding areas. It would have a sizeable footprint, dominate the lower storeys of a building which are the most critical in achieving a high-quality pedestrian environment and potentially take away from the physical character and retail vitality of its surroundings instead of coexisting and strengthening its neighbours;
- The OLG's proposed casino gaming floor of between 150,000 - 250,000 square feet with up to 5,000 slot machines and 300 table games would be amongst the larger casinos found internationally and one of the largest slot operations. Furthermore, a facility with the other components and at the scale suggested would be comparable to large, integrated, resort complexes located in places like Singapore, Macao and Las Vegas. A Toronto comparable would be a facility the size of two Yorkdale Shopping Centres.
- Other negative impacts associated with a casino in Toronto's downtown area include the typical auto-oriented travel behaviour of casino patrons, which could be difficult to mitigate, and counter to efforts underway to address transportation congestion. Reducing the size of the casino would assist in managing the transportation impacts;
- Larger international resort casinos are typically not located immediately within downtown areas. They tend to be located in rural areas on large plots of land such as the Foxwoods and Mohegan Sun or on the periphery of downtown areas. Other resort casinos are located in areas designated and planned for casino resorts such as the Venetian Macao and the numerous Las Vegas resorts.
- Increasing convention space would be a strategic economic development benefit that could be leveraged with a casino given the opportunities to co-locate these facilities and the synergistic relationship between the casino and convention business; and
- Addressing the insular and inwardly focused nature that casinos have in the past exhibited is possible through appropriate design measures, especially when form and scale are reduced.

Should City Council determine that casino uses be expanded in Toronto, the optimum response to OLG's modernization strategy, which anticipates a casino of 150,000 to 250,000 square feet with up to 5,000 slot machines within an integrated resort-styled complex in the C1 zone, is to adopt a solution that maximizes the city building benefits and minimizes the potential negative consequences of casino land uses. This requires taking a citywide perspective due to the different contexts in Toronto's downtown area and at Woodbine. Looking at casino options that address the locations together helps achieve a better fit, reduces the potential for conflicts and impacts and increases the possibility for leveraging economic benefits from associated land uses.

First, the Woodbine racetrack accompanied by a large format slot focussed casino, which exists today, together with a planned urban entertainment and retail centre immediately adjacent has been anticipated at Woodbine since the 2007 City Council approval. Nothing has changed and

indeed, as a revitalization strategy for Woodbine, given the approved planning framework for an entertainment and retail destination, the rise in job losses in northwest Toronto and the threatened nature of the horse racing industry, there are reasons to support the approved strategy for Woodbine.

Second, Toronto's downtown area's success has been built on diversity, balance, transit supportive uses, active streets and growing residential neighbourhoods. A well-designed casino that is reduced in size and which emphasizes table games in the C1 zone would be more appropriate. Moreover, limits on other integrated elements, like retail, and that leverages additional convention infrastructure as a key condition, would be a better fit for this area. By requiring a calibrated profile, the facility could be distinguished from other iconic resorts duplicated across the world.

The built form and massing of development proposals across the city are commonly refined through the development review process to reduce impact and improve compatibility. For larger one-off land uses like a casino, our typical approach to new development is of particular importance to reduce the potential for unintended consequences. Based on the review of international precedents and city building objectives for Toronto's downtown area, a casino format that would be more suitable would consist of an appropriately-scaled, urban entertainment complex with the following components:

- A casino gaming floor area of up to 135,000 square feet and total footprint which would not exceed 175,000 square feet inclusive of back-of-house functions. This floor area takes into account the OLGs assumptions for floor area per slot position (30 square feet per slot machine) and table games (225 square feet per table game). City Planning staff have applied a 30% assumption for back of house functions which is a reasonable amount of space for an urban facility;
- More emphasis on table games and significantly less emphasis on slot machines with no more than 1,500 slot machines and 400 live-dealer table games. This direction is based on a review of international precedents and achieving a desired profile for the C1 zone that is differentiated from other casinos in Ontario and North America;
- An urban form that is designed to fit within its local context, which could include distributing the casino floor area on multiple levels that also provides an appropriate mix of uses consistent with existing development and planned objectives for specific areas;
- Limited casino-related food/beverage and retail uses of up to 100,000 square feet. This approach recognizes that should a more comprehensive redevelopment of a site in the downtown core study area be contemplated, that additional retail associated with residential and office uses may be provided subject to a detailed review that would not be unlike other recent redevelopments. Significant retail associated within the Port Lands and Exhibition Place would not be in keeping with the planning framework for these areas;
- Increasing contiguous convention space to bring Toronto to within reach of the top ten convention facilities in North America while also ensuring that built form impacts are minimized;
- Hotel accommodation that may assist in creating a "tourist destination" as well as making the convention space more desirable and marketable. Within Exhibition Place, the existing lease with HK Hotels would need to be resolved prior to considering a hotel component;

- Potentially limited theatre space depending on the specific site; and
- Other features and attributes that ensure a positive contribution to the overall character of the downtown core (C1 zone) are included in Section 4 – Planning Directions – including general and study area specific conditions.

By adopting a scaled-back, more unique urban format in the C1 zone, regulating the number of slot machines and table games, appropriately limiting the associated food, beverage and retail uses and leveraging a convention centre expansion, the following could be achieved:

- The profile of the casino would be reduced and an improved fit within the overall urban character of Toronto's downtown area could be achieved;
- Design of the facility should be a priority. An urban form is required that is designed to fit within its local context, which would include ensuring that the street frontages are animated with active uses at grade, distributing the casino floor area on multiple levels, providing an enhanced public realm and locating parking below-grade;
- Transportation and infrastructure impacts would be more manageable;
- More emphasis could be placed on the facility as a tourist attraction rather than a large slot operation as put forward by the OLG which is targeting primarily local patrons; and Market impact on existing restaurant and retail streets could be minimized where casino-related retail and food and beverage uses is limited.

## **2. STUDY AREA ANALYSIS**

City Planning staff completed study area analyses for three locations in the C1 zone: Exhibition Place, the downtown core study area and the Port Lands. The City's Executive Committee directed Staff to report on possible locations and the recommended size and type of casino facility that may be suitable for these locations. In the absence of having a specific development application to consider, a study area approach was undertaken to assess the planning frameworks for the respective areas and to determine whether a casino is an appropriate fit for each of the study areas. This also provides a more general understanding of the local issues that are unique to each area and has enabled staff to identify area specific conditions should Council consent to hosting a new casino in the C1 zone.

The analysis identified opportunities and challenges of introducing a casino use within the C1 zone and expanding existing facilities in the C2 zone, with this information presented to the public during the consultation. The analysis focused on five themes: existing planning framework, urban fabric, place making/public realm, transportation and infrastructure. This report expands on the opportunity and challenges analysis to further define possible requirements for considering a new casino use within suitable areas, recognizing that the form and scale of a new casino facility may vary depending on the specific location and context and in keeping with a citywide strategy for these uses.

## 2.1. Exhibition Place



The Exhibition Place lands are organized in a campus-like setting on 192 acres of land located within the *Central Waterfront* area, with a clustering of heritage resources and open spaces. Situated between the Gardiner Expressway and Lake Shore Boulevard, with access points from Lake Shore Boulevard West, Dufferin Street and Strachan Avenue, Exhibition Place is, to a certain extent, separated from surrounding neighbourhoods.

The lands are an important asset for the City in their ability to host major public events and celebrations and are the City's only dedicated "exhibition" grounds. Exhibition Place is also an

important venue for business, commerce, trade and consumer shows along with conferences and conventions.

Employees that work in the office spaces at Exhibition Place, visitors to scheduled events and residents of the surrounding neighbourhoods are the major users of the space. Exhibitions and shows such as the Royal Winter Agricultural Fair, the Boat Show, the Home Show and most notably the 18-day Canadian National Exhibition (CNE), bring large numbers of visitors to the site annually. It is estimated that the number of visitors to Exhibition Place for 2011 was approximately 5.3 million, including approximately 1.5 million to the Canadian National Exhibition. However, this utilization is not consistent throughout the year.

### 2.1.1 Planning Framework

The Exhibition Place lands are designated as *Regeneration Areas* and *Parks and Open Space Areas – Other Open Space Areas* in the Official Plan and are located within the boundary of the Central Waterfront Secondary Plan. While this Plan has yet to be fully approved by the OMB, it envisions Exhibition Place to expand into a dynamic area where people work, visit and live. New retail development will only be considered within the context of the City's urban planning principles and must be supportive of the core principles of the Plan. New development is to respect and celebrate Exhibition Place's existing heritage architecture and views of heritage buildings from the water. Adaptive re-use of heritage buildings is encouraged. New development within lands designated *Parks and Open Space Areas – Other Open Space Areas* may only be considered if existing open space areas are maintained or alternatives to expand the size and usability of City-owned parks is provided.

Unlike other areas of the City, where development is governed by zoning by-laws, development within Exhibition Place is regulated by the *City of Toronto Act, 2006*. Section 406 of the Act entrusts its management and operations to its Board of Governors and outlines the permitted uses. It directs that the lands will be used primarily for parks and exhibition purposes. It provides

for expansion of permitted uses subject to approval by the City. The Act also requires that an exhibition be held annually within the lands.

The Urban Design Guidelines developed for Exhibition Place (which City Council adopted in 2004 as part of the City's consolidated Urban Design Guidelines) provide additional guidance for new development within the lands, of particular note:

- The provision of a public open space system linked to a network of enhanced pedestrian routes and public streets, including extending Princes' Boulevard to provide an east-west connection for pedestrians through the central area of the site and enhancing north-south connections;
- The protection of future transit expansions;
- The protection and enhancement of important views, view corridors and gateways;
- Built form principles to guide new development such as a requirement that the amount of public open space will not be reduced; and
- The amount of land dedicated to surface parking in Exhibition Place will be reduced with new or replacement parking located below grade.

Exhibition Place has prepared a number of detailed plans to provide further guidance, including the Exhibition Place Strategic Plan (2009-2012), the Exhibition Place 2010 Structure Plan and the Festival Plaza at Exhibition Place Master Plan.

The Festival Plaza Master Plan outlined concepts for a multi-use plaza that would also provide space for the CNE, other outdoor festivals and events, surface or underground parking and pedestrians. The approximate area of the Festival Plaza is 6.7 hectares /16.5 acres. This parcel is currently used for parking and midway during the CNE.

Recent developments include the addition of the BMO Field (soccer facility) and the renovation of the Automotive Building (Allstream Centre) to become a meeting and conference venue. A new hotel has been approved for the lands. Construction is anticipated to begin in 2013.

### *2.1.2 General Development Considerations*

The Gardiner Expressway, rail corridor and Lake Shore Boulevard physically separates Exhibition Place from neighbourhoods to the north and Ontario Place to the south. Nonetheless, the lands are a resource for adjacent neighbourhoods. The lands are well connected along its eastern boundary at Strachan Avenue to the neighbourhoods to the east.

Exhibition Place is located to the west of Bathurst Street, with a streetcar route providing direct access to the Exhibition Lands from Union Station. However, it is not located in close proximity to Toronto's downtown area and as such is more limited in its ability to rely on the downtown's businesses, hotels and other amenities.

### *Built Form and Use*

Generally, Exhibition Place consists of large structures, surface parking lots, and expanses of open space within a campus like setting. Many of the existing buildings and structures are sited as pavilions in an open space context, which creates irregularly shaped blocks.

The lack of a fine-grain urban fabric may provide opportunities for new entertainment venues, however, there are a limited number of large, undeveloped sites and there is a policy direction to maintain the character of the area. Moreover, given the space required for the programming needs of events like the CNE and Honda Indy, land available for new large-scaled development is limited. Building heights are also restricted due to the proximity to the Billy Bishop Airport (Island Airport) and the delineation of the flight paths associated with the airport.

Another consideration for new development is the concentration of heritage buildings and structures. There are nine buildings designated under the *Ontario Heritage Act*, and a further thirteen listed on the City's Inventory of Heritage Properties. While the Secondary Plan encourages adaptive re-use of heritage buildings, ensuring the appropriate conservation of the buildings and structures requires careful consideration. Likewise, new development adjacent to these resources must complement the character of adjacent heritage buildings and their open space context. Additionally, there are areas with archaeological potential. The preparation of Archaeological Assessments would be required prior to permitting new development.

### *Open Space Character*

The open space character of Exhibition Place and its proximity to the waterfront is a valuable asset for the city. Approximately 50 of its 192 acres are gardens, parkland and open spaces. Siting new development in this context necessitates innovative approaches that maintains and enhances the open space character of the grounds.

Although there are significant open space areas, there is a lack of pedestrian connections to the broader area. Moreover, the irregular shaped blocks inhibits a fine-grained network of pedestrian routes. This is an important consideration for future development and change at Exhibition Place, due to the microclimate conditions over the course of the year.

### *Proposed Development Projects*

A site plan review was recently completed for a new 400-room hotel development at the southwest corner of Princes' Boulevard and Newfoundland Drive, with construction expected to start in 2013. The proposed hotel development also includes ancillary amenities like theatre space, retail, and recreational amenities (i.e. squash courts, tennis).

The lease between Exhibition Place and the hotel operator allows for a second phase of the hotel to be built on the adjacent lands to the west within a period of 10 years following the opening of the hotel. As well, the lease contains exclusivity clauses that would prevent another hotel for a 15-year period after the hotel opens. After 15 years, a hotel within Exhibition Place, but located to the west of Ontario Drive, could be considered.

The planning undertaken for the hotel included developing creative solutions to many of the challenges associated with development at Exhibition Place, including addressing open space



requirements, conservation of heritage and archaeological resources and replacing surface parking in a 406 space, below-grade parking structure.

### *Festival Plaza*

Festival Plaza is planned to be a major, dual-purpose open space for Exhibition Place. It is approximately 6.7 hectares (16.5 acres) in area and is currently used for parking most of the year. During the CNE, the lands are utilized for a portion of the midway. The space is planned to be enhanced and would continue to provide space for the CNE and other outdoor festivals and events, as well as maintain parking within the grounds during other times of the year.

Any redevelopment on these lands would need to maintain this open space or provide an appropriately planned alternative on the grounds, which would achieve similar objectives, like providing a setting and improved servicing capabilities for the CNE, improving pedestrian connections through the grounds and contributing to the overall parking strategy for the area. Another important consideration for the Festival Plaza site are the footings of the former Exhibition Stadium, located below the surface of much of Festival Plaza.

### *Convention/Trade Show Space*

An expansion of the Direct Energy Centre (DEC) could increase the potential to attract new tradeshow or conventions that require larger spaces and meeting venues. Currently, the DEC is ranked 10<sup>th</sup> for Exhibition Centres in North America, but is ranked low for convention space as there is a lack of meeting space and nearby hotels. However, in order to improve the competitive ranking of this space it is important that any future expansion to convention/trade show facilities be done contiguously with the areas' existing facilities.

Exhibition Place undertook an exercise in 2010 to determine the feasibility of expanding the Direct Energy Centre to provide more meeting space and functional space. The CNEA was consulted with during this process and the preferred option for expanding convention/trade facilities included an addition to the DEC at its southwest corner, along Princes' Boulevard, within lands currently used for the CNE's midway. Other improvements contemplated include upgrades to the Industry Building.

### *The Canadian National Exhibition*

The Canadian National Exhibition (CNE) is a 135-year tradition in Toronto and the largest fair in Canada. Throughout the month of August, as part of the CNE, there is a temporary casino located in the Better Living Centre. The CNEA provided a breakdown of how they currently use the Exhibition Place lands during the 18-day event to Toronto and East York Community Council at its January 22, 2013 meeting.

According to Exhibition Place's Festival Plaza Master Plan, the CNE requires a durable and level surface for its midway, storage space for trailers and an area for temporary housing for carnival employees. Though the footprint of the CNE is large, the event itself is flexible, and has changed its layout throughout the years.

### 2.1.3 Considerations for a Casino at Exhibition Place

Any consideration for a new casino use in Exhibition Place should be required to maintain the campus-like setting and open space character of Exhibition Place. A new large, integrated entertainment resort complex, on the scale proposed by the OLG, would not be a suitable fit for Exhibition Place as it would compromise this objective and would be a new direction not anticipated by the Central Waterfront Secondary Plan for the lands. This would likely require an Official Plan amendment. A comprehensive review, potentially leading to a Precinct Plan, that takes into consideration surrounding areas would be required prior to advancing any specific proposal for a large, resort-styled integrated complex that includes significant retail and other uses.

There are, however, some potential benefits for locating a new, scaled-back permanent casino within Exhibition Place:

- Locating a new, permanent facility, such as a casino, at Exhibition Place has the potential of creating another year-round use within the lands, and thereby, increasing its utility and function within the city.
- Opportunities to expand upon existing convention/trade show space may help to increase the marketability of Exhibition Place, and Toronto, as a convention destination. A new, permanent casino within Exhibition Place should be required to realize the planned expansion to the Direct Energy Centre.
- Opportunities to increase ancillary retail and restaurant uses in Exhibition Place would provide amenity for employees, visitors and nearby residents. However, new retail development should only be considered within the context of the purpose of Exhibition Place and must be supportive of its core planning and development principles. A significant retail and service component as proposed in the OLG's model would not be a suitable use within Exhibition Place.

City Planning staff have analyzed potential sites that could accommodate a new, permanent casino. Several principles have been used for assessing the feasibility of the potential sites at Exhibition Place:

- Demolition of designated/listed heritage buildings/structures is not an option. However, adaptive re-use that appropriately conserves heritage buildings and structures would be encouraged;
- There should be no net loss of open, landscaped spaces in accordance with the policies of the Official Plan and in keeping with the character of the lands. New buildings should be set in a landscaped setting consistent with the character of Exhibition Place;
- Site identification is consistent with existing plans developed for Exhibition Place;
- Convention/trade show expansion would be consistent with the plans developed along Princes' Boulevard;
- Any potential redevelopment on undeveloped parcels must consider the role of these parcels in the current and planned programming for Exhibition Place and alternatives must be viable if current programming is to be displaced; and

- Replacement of existing surface parking and meeting parking needs of new uses would be required with below-grade parking in accordance with the planning framework.

Limitations in the analysis include:

- Some sites identified may have archaeological potential, which would have to be resolved through the review of a development application and completion of archaeological assessments; and
- A new hotel component was not considered, given the current lease with HK hotels for a 400-room hotel and possible expansion. Any consideration for new hotel space would have to resolve lease obligations imposed on the City and is beyond the purview of this analysis.

#### *Potential Sites*

The 2010 Structure Plan for Exhibition Place identifies two potential development sites, not including the proposed hotel sites. These include:

- The northwest corner of the Exhibition Place, which is currently occupied by a surface parking lot. It is 1.78 hectares (4.4 acres) in area and is used exclusively for parking, including during the CNE; and
- A second surface parking lot, located at the northern edge of Exhibition Place, with an area 1.65 hectares (4.07 acres). During the CNE, this parcel is used for both the midway and parking.

In addition, there could be opportunities for the adaptive re-use of existing heritage buildings, which would have to be determined through discussions with Exhibition Place.

A scaled-back casino floor of 135,000 square feet for a total footprint of 175,000 square feet inclusive of back-of-house functions and ancillary retail and food and beverage establishments, can be accommodated on the potential development sites while maintaining the open space character of Exhibition Place. Peripheral sites would be the most suitable as impacts on the CNE could be minimized further.

#### *Accommodating the CNE*

Although the CNEA's presentation to the Toronto and East York Community Council identified their current requirements which included large areas used for surface parking and back of house purposes during the CNE, the planning framework and development plans for Exhibition Place recognizes that surface parking is not an optimal use for these lands and anticipates replacing surfacing parking with underground parking. Moreover, the lands are not static and the planning framework recognizes the need to allow Exhibition Place to continue to evolve. Therefore, Planning Staff consider the potential sites to be suitable for redevelopment (provided that parking spaces lost through redevelopment are replaced) and there is no net loss of designated/planned open spaces.

City Planning met with CNEA representatives to gain a better understanding of their functional requirements, constraints and concerns. Based on the analysis of potential sites that could accommodate a new permanent casino, impacts to the CNE would be minimized. Moreover, the

potential sites identified are consistent with the planning framework developed for the area by Exhibition Place in consultation with the CNEA.

While there are opportunities for redevelopment within the Exhibition Place lands, which preserves the ability for the CNE and Honda Indy to continue, the quality of space for the CNE is an equally important consideration and any new, permanent casino would be required to demonstrate how this is achieved.

#### *2.1.4 Transportation*

The Exhibition Place site is bounded by the Gardiner Expressway and railway corridor to the north, Lake Shore Boulevard to the south, Dufferin Street to the west and Strachan Avenue to the east. The existing transportation services at the site includes the Dufferin 29 TTC bus, and the Bathurst 511 and Harbourfront 509 streetcar line which turn around at the Manitoba Drive loop north of the Horse Palace building. Other transit services include the GO Station on the Lake Shore West Line and the Ossington 63 TTC bus route just north of the GO Station in the Liberty Village Neighbourhood. Access to the Liberty Village Neighbourhood is provided via a pedestrian tunnel that also connects the GO Station platforms.

The existing parking on the site is approximately 6,000 spaces that serve the various events, activities and on-going operations. During certain key event and activity times in the year the parking supply is fully occupied. The TTC also operates additional bus and streetcar services during events at the BMO Stadium, during the CNE and in the summer months.

Traffic congestion, primarily along the Gardiner Expressway and Lake Shore Boulevard corridors is significant during the weekday morning and afternoon peak periods, with little to no spare capacity. Although roadway capacity during weekday off-peak times may be less constrained, during weekend periods when major events are taking place at Exhibition Place, Ontario Place or in Toronto's downtown area, major roadways in this area are often very congested. Moreover, there is limited direct access to the Gardiner Expressway westbound at Jameson Avenue, as the on-ramp is closed during the afternoon peak period between the hours of 3:00 p.m. and 6:00 p.m. Similarly, the eastbound on ramp to the Gardiner Expressway is closed during the morning peak period between the hours of 7:00 a.m. to 9:00 a.m. The Liberty Village neighbourhood to the north has also grown rapidly in recent years and has contributed to increased traffic on the surrounding road network.

Proposed improvement plans for Exhibition Place include the completed Environmental Assessment (EA) to extend the streetcar service from the Manitoba Drive loop to Dufferin Street. Ultimately, the long term plan is to continue the streetcar extension further west to the intersection of Queen Street West and Roncesvalles Avenue, and to Union Station via Fort York Boulevard/Bremner Boulevard in the east. The completed project would create a continuous Waterfront West line from south Etobicoke to Toronto's downtown area. Other potential improvements include the extension of Dufferin Street south from British Columbia Drive to Lake Shore Boulevard, and improved pedestrian connections on-site and also south to Ontario Place. A new casino in Exhibition Place should be considered with appropriate transit improvements, such as providing a permanent bus route through the site and additional

frequency of service at the existing GO station, pedestrian and traffic operation improvements to minimize potential impacts.

Based on a preliminary assessment of parking for a casino gaming floor area of 135,000 square feet in the C1 zone up to 2,200 spaces would be required. This is based on proposed harmonized by-law parking rate of 25 spaces/100 m<sup>2</sup>, the existing modal split characteristics of this area of the city (42% of trips to Ward 19 over a 24-hour period are made by automobile), the site specific transportation characteristics of Exhibition Place as well as the potential auto-oriented tendency of casino patrons. As a result, the factor of 42% was adjusted to 70%. This factor may vary during the peak hours of weekday road network conditions, and will be subject to further assessment.

The traffic generated by the parking will require careful evaluation to identify appropriate mitigation measures to address pedestrian, transit and traffic impacts. Moreover, other uses included as part of a casino complex may necessitate the provision of additional parking or shared parking strategies. The required improvements will require a functional level of feasibility analysis and design, with corresponding timelines for implementation.

### *2.1.5 Infrastructure*

There is an existing network of servicing infrastructure within the Exhibition Place site that ties into a well-distributed servicing network on the perimeter of the area:

- The internal water supply system ranges from 150 to 300mm diameter with an 1800mm diameter transmission watermain traversing the site from west to east;
- The internal sanitary sewer network for the site is typically 300mm in diameter and it discharges to a 300 to 750mm diameter combined sewer along Lake Shore Boulevard which outlets to the Strachan Sanitary Pumping Station. During rainfall storm events, the combined flow could exceed the capacity of the combined sewer and Strachan Sanitary Pumping Station; and
- The storm sewer network ranges from 300 to 1200mm diameter and discharges directly to Lake Ontario through two outlets crossing Lake Shore Boulevard. There are reported incidents of surface flooding on Lake Shore Boulevard adjacent to Exhibition Place during rainfall storm events.

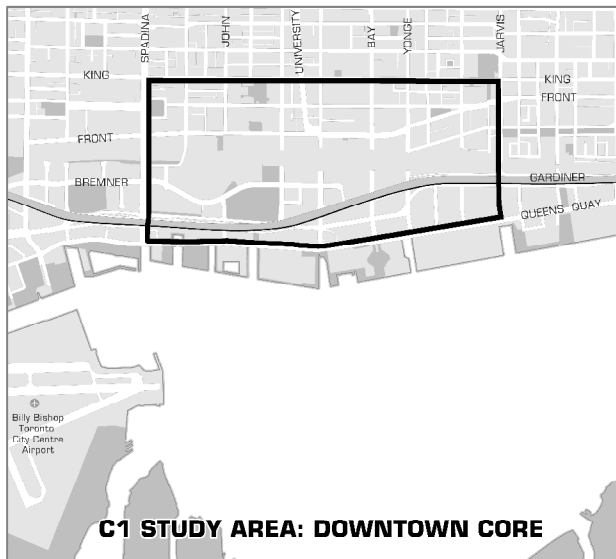
The internal servicing is likely not of suitable capacity and location to support a significant development without improvements, including replacement of some of the infrastructure. There is capacity available in the external network of water supply, sanitary and stormwater infrastructure to support some increased demand. However, infrastructure improvements will likely be necessary to address the impacts of rainfall storm events affecting the combined sewer and the Strachan Sanitary Pumping Station and surface flooding on Lake Shore Boulevard.

A detailed Functional Servicing Report will need to be undertaken in support of future proposals to determine servicing requirements taking into consideration the City's existing standards and guidelines. Redevelopment of the site could incorporate mitigating measures to address capacity concerns during rainfall storm events.

### 2.1.6 Conclusions

Should Council consent to a new, permanent casino in the C1 zone, there are opportunities for a permanent casino in Exhibition Place that does not exceed a casino gaming floor of 135,000 square feet with a total footprint of 175,000 square feet including back-of-house functions. An expansion to the Direct Energy Centre should be leveraged with any casino development in Exhibition Place., Suggested detailed planning directions for the Exhibition Place study area are included in Section 4.

## 2.2 Downtown Core



For the purposes of City Planning's study area analysis for the downtown core the boundaries of the study area are King Street to the north, Spadina Avenue to the west, Jarvis Street to the east and Queens Quay to the south. These boundaries were selected as it represented a large enough area to complete a preliminary planning analysis. This area includes the Metro Toronto Convention Centre site, a site released in the media as a potential casino site.

The study area is a complex area with a wide variety of uses clustered within walking distance to Union Station. A number of the City's arts and cultural venues and major tourist destinations are located within this

general area, including the CN Tower, Rogers Centre, Air Canada Centre, Metro Toronto Convention Centre, Roy Thomson Hall and the Sony Centre for Performing Arts. There are also numerous office buildings that are part of the Financial District which extends further to the north.

### 2.2.1 Planning Framework

The downtown core study area's lands are designated as *Regeneration Areas*, *Mixed Use Areas* and *Parks and Open Space Areas* in the Official Plan. The study area is also within the *Downtown* and *Central Waterfront* area identified on the Official Plan's Urban Structure Map. Lands within these areas are targeted as growth areas, while also recognizing that not all areas will develop at the same intensity and scale.

The planning framework for the study area is further guided by four Secondary Plans - the King Spadina Secondary Plan, Railway Lands East and Central Secondary Plans and the Central Waterfront Secondary Plan – and the Union Station Heritage Conservation District Plan. These planning documents provide additional policy direction for the areas addressed within the respective plans:

- The King-Spadina Secondary Plan promotes development of a diverse community, while reinforcing the character, massing, height and streetscapes prevalent in the area.
- The Railway Lands Secondary Plans promote the development of the lands as an integral part of Toronto's downtown area to reduce barrier effects and to reunite the area with the Central Waterfront. New development is to have a mix of uses, and a form, character and environmental quality which ensures that the area is used by people for a wide variety of purposes. Moreover, redevelopment will satisfy a broad range of commercial, residential, institutional, cultural, recreational and open space needs.
- The Central Waterfront Secondary Plan is based on four core principles:
  - Removing barriers/making connections;
  - Building a network of spectacular waterfront parks and public spaces;
  - Promoting a clean and green environment; and
  - Creating dynamic and diverse new communities.
- The Union Station heritage Conservation District Plan defines the cultural heritage value of the area surrounding Union Station and establishes a historical framework to guide the enhancement of the Union Station District as a place of cultural significance in the city

There is a Precinct Planning exercise underway for the Lower Yonge area in accordance with the requirements of the Central Waterfront Secondary Plan and two Heritage Conservation Districts (HCD) studies for the St. Lawrence neighbourhood and the King-Spadina area are also underway.

### 2.2.2 General Development Considerations

The study area is generally a dense, built-up urban area with numerous heritage buildings, both listed and designated under the *Ontario Heritage Act*. North of Front Street there is a fine-grained street and block pattern. A less fine-grained street network is evident south of Front Street west of Bay Street and east of Yonge. Existing buildings at these locations generally have larger footprints, like the Rogers Centre and LCBO warehouse.

The built form and lot fabric within the study area is varied. Six distinct sub areas have been identified:

- The Central Waterfront area north of Queens Quay to the Gardiner Expressway is an urbanized area with a mix of land uses, including public parks and waterfront trails, dense, high-rise residential development with commercial and retail uses at grade.
- Located within the Central Waterfront area, the Lower Yonge Precinct is comprised of three large blocks with the Toronto Star office building and a surface parking lot, provincially owned land (LCBO retail outlet, offices and warehouse space). A large-format supermarket is located along the eastern edge of the Precinct.
- Old Town/St. Lawrence Neighbourhood is a mixed-use neighbourhood that has significant historical and architectural resources generally within low-to mid-rise buildings and with a smaller block fabric.
- The Financial District is comprised primarily of high-rise office buildings and large, architecturally significant landmark buildings. The area also includes Union Station, a

significant transportation hub, and the Air Canada Centre. The area has a fine-grained street and block structure, with some larger blocks that are divided by mid-block connections and the PATH system.

- Major large-scaled office, hotel, convention facilities and major tourist destinations, as well as an emerging residential area characterize the lands south of Front Street and west of Lower Simcoe Street.
- Lands north of Front Street and west of John Street are also part of the Entertainment District and King-Spadina neighbourhood. Historically, the King-Spadina area was a manufacturing district. Remnants of this heritage are evident in the low-rise heritage buildings scattered through the area. The area has been redeveloping and there is a mix of large-scale residential buildings and new office uses.

The study area is a highly desirable location. It has the highest growth of the four study areas, as well as more development activity than many other areas in the City. 28 development applications have been submitted in the area since July 2007, many of which are for tall buildings. There are also a number of underutilized sites, like surface parking lots, that could be redeveloped in the future.

A key challenge for new development in this area, irrespective of use, is ensuring the proper integration of new development into an already dense, built-up area, while still meeting the City's built form objectives. Equally important is ensuring that the breadth of uses and activities in Toronto's downtown area are maintained and enhanced consistent with objectives in the various planning documents. Other challenges include increasing congestion, provision of amenities for new residents and balancing change with the emergence of a stronger sense of community due to the increasing residential development occurring.

Where redevelopment is proposed on larger sites, frequent entrances for stores and other uses and wider sidewalks are encouraged to create a more interesting, animated and safer street environment. For instance, the south side of the Front Street frontage, west of Union Station, is characterized by large blocks with few active uses at-grade. Through redevelopment, the pedestrian experience along this portion of Front Street could be improved by providing multiple storefronts and active uses at grade. Furthermore, in areas characterized by a prevalence of tall buildings, the design of the lower storeys is particularly important and relates directly to creating a great pedestrian experience.

The area has some larger parks in the vicinity of the CN Tower and along the waterfront. There are also a number of smaller parks, plazas and publicly accessible open space areas. As reflected in the Official Plan, the creation of new parkland is limited as the area is generally built-up. There is also limited community infrastructure to serve residents and employees, with only child care facilities within the study area boundaries. The majority of existing and planned community infrastructure is located to the north, east and west of the area.

Narrow sidewalks are prevalent in portions of the downtown core study area. A number of studies and environmental assessments focused on improving the north-south public streets from a public realm perspective have been completed. New facilities that generate significant pedestrian activity would add more pressure to an already challenged public realm and



improvements to the public realm would be required through the redevelopment of sites. In instances where streets are narrow with less than standard sidewalks, a key objective would be to create wider boulevards by setting buildings back. Other means of improving the public realm could include creating new civic plazas and open spaces on development sites.

Through the redevelopment of large blocks, there may also be opportunities to create mid-block connections which would help to break-up larger sites and improve pedestrian connectivity and satisfy objectives within the Railway Lands Secondary Plans and Central Waterfront Secondary Plan. Where practical, new or enhanced, PATH connections would also improve pedestrian connectivity.

### *2.2.3 Considerations for a Casino in the Downtown Core Study Area*

A large, integrated resort-styled entertainment complex, as proposed by the OLG, with a casino gaming floor area of between 150,000 to 250,000 square feet and up to 5,000 machines, would not be a suitable fit for the downtown core study area as it would:

- dominate the lower floors of a building which are the most critical for achieving a good quality pedestrian experience in a dense, built-up area;
- create another large building with limited permeability;
- make it more difficult to manage other impacts, like transportation and transit; and
- take away from the physical character and retail vitality of its surroundings instead of coexisting and strengthening its neighbours.

In consideration of the broader citywide approach for a new casino use in the C1 area, a casino use with a gaming floor area that does not exceed 135,000 square feet and a total footprint of 175,000 square feet with back-house functions, which leverages other benefits in an entertainment complex with an urban form could be considered. For the downtown core study area, this would include:

- New or expanded convention centre space which brings Toronto into the top ten for convention space in North America and as such makes Toronto more competitive in attracting large conventions and out of the GTA region visitors;
- New arts and cultural venues that are appropriately sized and where it is demonstrated that impacts on existing nearby venues are minimized through the submission of an event management strategy. Feedback received during the consultation indicated a preference for new arts and culture venues;
- New hotel space, especially where redevelopment on sites with existing hotel space, and provided the resulting built form of a building satisfies the City's requirements for tall buildings; and
- Some ancillary retail and service uses to achieve animated uses at grade, particularly for larger sites. Limiting the casino-related retail and service uses would minimize impacts on neighbouring shopping, entertainment and restaurant districts and support integration into the urban fabric. It is recognized that should a more comprehensive redevelopment of a site in the downtown core study area be contemplated, that additional retail associated with

residential and office uses may be provided subject to a detailed review that would not be unlike other recent redevelopments.

The provision of a scaled-back casino use with the other uses noted above, would be more consistent with the mixed-use objectives for development in the downtown core study area by providing a wide range of uses for a variety of people.

The downtown core study area is a large, complex, built-up area, with limited sites with consolidated ownership that would be large enough to accommodate the scaled-back casino and other associated uses identified above. Two potential large sites within the study area with consolidated ownership are the Metro Toronto Convention Centre and the adjacent RBC site which is owned by Oxford Properties and has been publicly announced in the media and the provincially owned LCBO site located on the north side of Queens Quay, just east of Yonge Street.

Other large sites may emerge if consolidation of properties and demolition of existing buildings occurs and as such, a more general approach to the analysis was undertaken. The complexity of the downtown core study area may result in some areas not proving suitable for an urban, entertainment complex with a scaled-back casino use. For instance, there may be limitations in other sites in the downtown core study area due to the provision of convention space, transit access and potential for a tall building element. Notwithstanding that the downtown core study area could be considered for a new casino, the actual approval of a project would still require a detailed and diligent planning application and review process.

The suggested casino floor area of up to 135,000 square feet with a total footprint not to exceed 175,000 square feet including casino back-of-house functions, could be accommodated in a three- to four- storey base building without overly dominating the frontage of a larger site and would more appropriately fit with the context and scale of the downtown core study area. By limiting the size of the casino floor area on a large site, it would assist in visually minimizing the mass of the base building and reduce its profile. Ancillary retail and service uses, provided at grade, would also be achievable and would help to enliven the street edge. Additional casino-related retail and food/beverage establishments could potentially be provided within the upper floors of a base building. A small theatre component or other type of arts and culture venue within the base building could also be possible, depending on the size of a specific site. A hotel component, in a tall building element above the base building, could be provided if it satisfied development criteria for tall buildings in the City and would add to the City's hotel space.

New or expanded convention facilities would need to be carefully designed and sized to ensure that they are properly integrated into the existing urban fabric. The implications will vary significantly depending on the potential site and would need to be fully addressed through the planning approvals process. Given the need for Toronto to have convention facilities of a significant size to increase Toronto's competitiveness for attracting conventions, innovative design solutions would be required.

There is the potential for a casino use to be put forward as part of a larger redevelopment. The Metro Toronto Convention Centre site is a prime example of where a larger mixed-use

redevelopment consisting of significant retail, residential, office, hotel and convention centre expansion and potential decking over the rail corridor to provide for additional floor area and open space to replace existing parkland is being contemplated in the media along with a potential new casino. The due diligence analysis reflected in this report was not site specific nor could it contemplate the range of potential redevelopment proposals that may come forward for a casino in the future. As noted elsewhere in this report, the submission of a development application would be required and reviewed in accordance with the City's practices.

#### *2.2.4 Transportation*

The most important transportation characteristic of the downtown core study area is the predominance of transit service, including local buses, streetcars, subway lines, and regional services such as GO Transit, regional and inter-city buses and VIA inter-city trains. This characteristic is reflected in the fact that approximately half of all trips into Toronto's broader downtown area over the course of a day are made by transit. Transportation planning policy in Toronto's downtown area is focused on this growing modal split trend away from private automobile use, and not just towards transit, but also towards walking and cycling, and is reflected in the Official Plan's approach to transportation. While this trend may not reflect the typical operating characteristic of a casino, it will, nevertheless, be a key factor in considering such a facility in the downtown core study area, and one which has been applied to other large-scale, entertainment land uses.

Another key consideration in the downtown core study area is the extensive pedestrian PATH network. This network spans the area roughly from Dundas Street to the waterfront (with future expansion), and from John Street in the west to Yonge Street in the east. In addition to connecting numerous offices, retail, entertainment, residential, hotels and other uses, it also facilitates connections to parking facilities and encourages the sharing of available spaces. Providing direct connections into this system and to Union Station has been utilized in the past as part of an overall strategy to reduce automobile use.

While the downtown core study area is rich in transportation amenities and positive characteristics, there are also many issues occurring in certain specific locations. These issues include, pedestrian, transit and vehicular congestion, the need for additional cycling facilities, goods movement and site servicing constraints, and ongoing construction impacts related to development sites.

There are also a number of plans (approved and proposed) and on-going studies to improve conditions in the downtown core study area. One of the critical projects is the on-going revitalization of Union Station to improve pedestrian circulation and platform conditions, public realm space and transit service. Specific plans include increased GO Transit service – particularly during off-peak times, and the addition of a dedicated transit link between Union Station and Pearson Airport with a new station between York Street and Lower Simcoe Street.

Other improvements under study or consideration include the review of the Yonge-University Subway line operation to help alleviate crowding, consideration of a Downtown Relief Line (DRL) to increase high order transit access, a study of traffic operating conditions in Toronto's downtown area for pedestrian, cycling, transit and vehicular movements, a strategic

transportation study for the Billy Bishop Toronto City Airport, Gardiner Expressway/Lake Shore Boulevard corridor improvements, waterfront transit improvements, and expansion plans for the PATH pedestrian network. From an overall perspective, the City is also undertaking a review of the transportation component of the Official Plan (Feeling Congested), and Toronto's downtown area will be an important factor within the larger plan.

The parking and management of traffic for a casino in the downtown core study area will require a strategic approach – one which recognizes the unique conditions of the area as described in the preceding paragraphs. This approach is consistent with previous transportation planning for special entertainment or sporting types of venues in the downtown core study area, including the Rogers Centre, Ripley's Aquarium (under construction), the Art Gallery of Ontario and the Air Canada Centre. The key issue is that the typical auto oriented character of casinos is not supportable in this environment.

Based on a general and preliminary assessment of parking for a casino gaming floor of 135,000 square feet, up to 1,570 new parking spaces would be required. This range is based on the general city rate of 25 spaces/100 m<sup>2</sup> (considered to be a maximum), the existing modal split characteristics in the downtown core study area (30% of trips to the downtown over a 24-hour period are by automobile, as well as the general auto oriented tendency of casino patrons. Consequently, the 30% factor was adjusted to 50% as a higher proportion of casino patrons may drive and will be subject to further assessment.

The traffic generated by this range of parking will require careful evaluation to identify appropriate mitigation measures to address pedestrian, transit and traffic impacts, as well as taxi queuing, pick-up/drop-off needs, tour bus accommodation, and servicing requirements. A particular area of concern will be the peak hour impact on current conditions, and access to/from the Gardiner Expressway/Lake Shore corridor, which experiences regular congestion delays. Proposed mitigation measures will required a functional level of feasibility analysis and design, with corresponding timelines for implementation.

### *2.2.5 Infrastructure*

The study area is supported by a well-distributed network of servicing infrastructure. The distribution watermains range in size from 150 to 600 mm diameter with a transmission watermain (1200 to 1800mm diameter) running north-south along Spadina Avenue through the Skydome to the Toronto Islands. Storm drainage is serviced by a network of local storm sewers ranging in size from 300 to 2400mm diameter.

Railway tracks form the boundary that defines the direction for sanitary drainage. North of the tracks the area is serviced by a network of combined sewers ranging in size from 300-1650mm diameter. There is a 1500mm diameter trunk sewer along Front Street that ultimately drains to Ashbridges Bay. South of the railway tracks the area is serviced by a network of local sanitary sewers ranging in size from 200 to 600mm diameter that drain by gravity flow to one of the sanitary pumping stations (Skydome PS, Simcoe St. PS or Scott St. PS) where sanitary flows are pumped and then redirected to the trunk sewer along Front Street. While some capacity is available in the infrastructure network, both the Skydome PS and the Scott St. PS are operating at capacity with Simcoe St. PS operating near capacity.

Since the study area is well supported by the existing infrastructure network, many options are available for servicing connections. If the venue is to be situated on a site north of the CNR tracks there may be some local improvements required, but there should be minimum impacts to the pumping stations. If the venue is to be situated on a site south of the CNR tracks, it is very likely that the required improvements would include local services and a pumping station. Improvements to a pumping station could be costly and could potentially lengthen the design and construction process. Although some capacity is available in the network, a detailed functional servicing study in support of the future proposal is required to determine the necessary improvements to service the site.

City staff would consult with other utility providers, like Toronto Hydro, if a development application was submitted to determine if any upgrades would be required, such as to the hydro substation.

### *2.2.6 Conclusions*

Should Council consent to a new casino in the C1 zone, there are opportunities for an entertainment complex with an urban form. The casino gaming floor area should not exceed 135,000 square feet and the number of slot machines and table games should be regulated to achieve a reduced profile in the downtown core study area. Suggested detailed planning directions for this study area are included in Section 4.

## **2.3 Port Lands**



The Port Lands are located east of Toronto's downtown area between the Inner Harbour and Leslie Street and south of Lake Shore Boulevard. The lands are approximately 356 hectares (880 acres) in area and were created through filling in of the Ashbridges Bay in the early 20th century as a new district to serve the city's growing industrial sector. The legacy of former industrial uses has left the lands contaminated with obsolete or substandard infrastructure to support redevelopment without significant investment.

Property within the Port Lands is mostly held by public agencies. Excluding streets, the City of Toronto and Toronto Port Lands Company (TPLC) own approximately 236 hectares (584 acres), including all parkland. The Federal Government owns approximately 25 hectares (63 acres) which includes Toronto Port Authority lands. The Province of Ontario (through Ontario Power Generation) owns 25 hectares (62 acres), and Waterfront Toronto owns 1.5 hectares (3 acres). The remaining 28 hectares (69 acres) of land are held by private interests.

The Port Lands are home to approximately 100 establishments that employ a total of 4,100 people. Existing businesses largely consist of manufacturing, warehousing, office and government-related uses, in addition to a growing media and film production sector concentrated around the Pinewood Studios. Recreation and park uses are located along the southern edge of the Port Lands within Lake Ontario Park. Many of the existing uses within the Port Lands also provide essential services and commodities for the broader city, such as bulk storage, industrial and material processing and shipping.

### *2.3.1 Planning Framework*

The Central Waterfront Secondary Plan (CWSP) is part of the City's Official Plan and is the primary policy document that guides the revitalization of the Port Lands. The CWSP is based on four core principles that apply across the waterfront.

- A. Removing Barriers/Making Connections
- B. Building a Network of Spectacular Waterfront Parks and Public Spaces
- C. Promoting a Clean and Green Environment
- D. Creating Dynamic and Diverse New Communities

The CWSP contains a mixed-use policy direction for the *Central Waterfront* area as a whole. It envisions the Port Lands as a Centre for Creativity, undergoing transformation to become a number of new, urban districts set amid Toronto's ongoing port activities. New media, knowledge-based businesses and "green" industries are also envisioned to be developed in the Port Lands. It will redevelop into several new neighbourhoods containing many of the elements characteristic of the best Toronto neighbourhoods. The Plan identifies that the area will be developed with medium-scale development with some taller buildings at appropriate locations. Lower buildings are to be located along the water's edge.

Prior to permitting new uses in the Port Lands, the CWSP also requires that Precinct Implementation Strategies be completed. Because of outstanding appeals to the Ontario Municipal Board, the Official Plan of the former City of Toronto is still in effect. Nevertheless, the CWSP represents Council policy and is utilized to inform precinct planning and revitalization efforts.

### *Flood Protection*

The former City of Toronto Official Plan contains restrictive development policies for the Lower Don Special Policy Area to regulate development within the flood zone. For lands generally east of the Don Roadway and north of the Ship Channel, development may be permitted on the condition that the proposed development is flood protected (one per 350 year event) and provided the land uses are permitted in the Zoning By-law.

In 2004, the Toronto and Region Conservation Agency, on behalf of Waterfront Toronto, initiated the Don Mouth Naturalization and Port Lands Flood Protection (DMNP) Environmental Assessment, which will transform the existing mouth of the Don River into a naturalized river channel. Upon completion, the new river channel and associated flood protection work will

remove the risk of flooding to over 290 hectares of land. In the absence of an implemented flood protection solution, the Port Lands cannot be developed to its full mixed-use potential. Existing industrial buildings can be repurposed for uses currently permitted in the Zoning By-law. The existing zoning does not currently permit a casino or integrated entertainment facility, similar to other areas in the former City of Toronto.

Development of new uses, including all buildings and structures and associated uses, would require amending the Special Policy Area. This municipally initiated amendment is subject to TRCA approval and adequate flood proofing and also requires provincial approval. The Province generally will not consider one-off amendments to the Special Policy Area. An area wide amendment to a portion of the Special Policy Area was adopted by City Council on August 27, 2010 (OPA 388) which implemented a two-zone flood concept based on the Don Mouth Naturalization and Flood Protection Environmental Assessment (DMNP EA) for the lands west of the Don Roadway. This was appealed to the Ontario Municipal Board and is not in effect.

#### *Port Lands Acceleration Initiative*

The Port Lands Acceleration Initiative (PLAI) was initiated in October 2011 to refine the DMNP EA and develop a business and implementation plan with the objective of accelerating development opportunities in the Port Lands. A final report on the PLAI was endorsed by City Council in October 2012, which recommended that City staff, Waterfront Toronto and TRCA continue their work on the Port Lands based on the findings of the PLAI. The Port Lands are currently under review through a second, more detailed phase of work, including finalizing the DMNP EA, completing a Port Lands Planning Framework and undertaking more detailed precinct planning for initial sub-areas of the Port Lands.

The process during the PLAI included a significant amount of public and stakeholder consultation. Public opinion was strongly in support of the mixed-use vision in a compact urban form with the new naturalized river channel as a focal point for the area.

The PLAI developed a phasing strategy for the provision of flood protection in the Port Lands (including the South of Eastern Lands) that proposed a 5-phase build-out over 30 plus years. Costs related to major infrastructure, transit and local costs (usually paid for by the developer) were determined and included in the phasing plan. These costs are summarized in the chart below. The PLAI did not examine the lands south of the Ship Channel as market analysis indicated development is not anticipated on these lands in the foreseeable future.

<b>Full Build-out Costs for Area North of Ship Channel (\$2012 millions)</b>						
	Phases in C&W 30-Year Financial Model		Post-30-Year Phases			
Phase	1	2	3	4 & 5	Remainder	Total
	Cousins & Polson Quays	Film Studio Precinct	Lower Don Lands	River Mouth Naturalization	Balance of Port Lands North of Ship Channel	
Flood Protection	65	114	262	15	0	456
Major Infrastructure	267	226	178	0	72	743
Transit Infrastructure	26	82	70	0	20	198
Local Infrastructure*	89	194	200	0	20	503
<b>Total Investment</b>	<b>447</b>	<b>616</b>	<b>710</b>	<b>15</b>	<b>112</b>	<b>1,900</b>

City staff have begun discussions with land owners and long-term lease holders on financing plans for development in the Port Lands. These discussions are still preliminary and are challenged by the significant up-front costs required for redevelopment, in addition to local and site specific development costs (i.e. soil remediation and new local public streets).

### *2.3.2 General Development Considerations*

The Port Lands are a challenging area to develop due to the requirements for flood protection, infrastructure, soil remediation and geotechnical requirements. The vast area of the Port Lands requires a comprehensive approach to redevelopment that coordinates investment to ensure the efficient provision of necessary infrastructure, while also ensuring that essential functions, like bulk storage and material processing, can continue and remain viable.

#### *North of the Ship Channel*

Lands located north of the Ship Channel are located in a flood zone and require precinct planning prior to permitting new development. A precinct plan for Cousins Quay is ongoing with an expected completion of early 2014 and development may be permitted subject to completing the first phase of the flood protection works. Cousins and Polson Quays provide an opportunity to extend new waterfront amenities along the eastern edge of the Inner Harbour to connect with Cherry Beach in the proposed Lake Ontario Park. They are high-profile locations that will be visible from the central waterfront and Toronto's downtown area and will define the eastern edge of the waterfront. It is vital to ensure that development on these lands represents the overall vision for the waterfront and is of the highest quality.

Lands between Cherry Street, the Don Roadway, Keating Channel and the Ship Channel are generally vacant with the exception of properties north of Commissioners Street which have some industrial, restaurants and other uses. Development within these lands requires the completion of the new river channel and other flood protection measures.



Lands east of the Don Roadway generally contain existing industrial and commercial uses and the Pinewood Studios complex. Significant investment has been made over the past decade in the film industry facilities in this area. Flood protection of these lands requires the construction of a flood protection landform from the CNR tracks south to the Ship Channel and the construction of a sediment control facility north of the Keating Channel in addition to a spillway. The Film Studio district is currently subject to a precinct planning exercise that is anticipated to be completed in early 2014. The precinct plan will be consistent with Central Waterfront Secondary Plan for the area which envisions a mixed-use district consistent that supports media and creative industries centred on the Pinewood Studio complex.

Further east of the Pinewood Studios complex are existing government-related facilities (Toronto Hydro, TTC, Canada Post), light manufacturing and storage, and the East Port precinct near Leslie Street that includes concrete batching and production facilities. Many of the existing uses are likely to remain in the long-term. The Port Lands Planning Framework will provide some direction for future precinct planning and development in this area to assist with incremental change consistent with the Central Waterfront Secondary Plan recognizing the nature of existing uses.

#### *South of the Ship Channel*

The lands south of the Ship Channel are not located within the flood zone and do not require a comprehensive flood protection program. These lands are largely used for bulk storage and recreational amenities and include the Port of Toronto (owned by the Toronto Port Authority), the former Hearn Generating Station and the Port Lands Energy Centre.

These lands have limited servicing and transportation access. Road connections are limited to the Cherry Street bridge over the Ship Channel and Unwin Avenue, both of which are not under direct City of Toronto ownership or control. There are no sanitary sewer services for these lands, new connections will be required to connect to Leslie Street to the east. Transit is limited to seasonal services to Cherry Beach during summer months only.

Re-use of the iconic Hearn Generating Station for a major destination use is a key opportunity for the Port lands. The building is currently subject to a long-term lease to a private corporation. However, the site's remote location from existing services, constraints imposed by the transmission lines, switching facility and the Port Lands Energy Centre (a 550-megawatt natural gas electrical generating station located immediately east of the Hearn) are challenges that must be addressed when considering options to re-use the building.

#### *2.3.3 Transportation*

The existing street network is limited and there are poor connections to the Port Lands from the north. Lakeshore Boulevard and the Gardiner Expressway are located on the northern boundary, with Cherry Street, the Don Roadway, Carlaw Avenue and Leslie Street providing the major north-south connections. These streets are generally in substandard condition for servicing new mixed-use development. The Lower Don Lands Municipal Class EA which addresses the transportation and infrastructure network for the lands west of the Don Roadway is currently

being updated. A second Municipal Class EA for the lands east of the Don Roadway, the South of Eastern lands and the lands south of the ship Channel is anticipated to be initiated shortly.

Existing transit service is also limited in the Port Lands with the Pape 72 (via Carlaw, Commissioner's and Cherry) and the Jones 83 (Leslie to Commissioner's turnaround) TTC bus routes. The Pape 72 also provides an extended route option to the Cherry Beach loop during the summer months. The Central Waterfront Secondary Plan (CWSP) acknowledges the importance of public transit for the connection of people and places to and within the renewed waterfront. An initial transit strategy was developed through the PLAI to incrementally extend new service into the Port Lands. Additional analysis will be undertaken in Phase 2 of the PLAI to explore options for advancing higher-order transit to the Port Lands. Another potential transit improvement is a GO Transit Station at Cherry Street, but this requires further evaluation to resolve operational and functional design issues.

The most important transportation consideration in the Port Lands is the strategic phasing of improvements and development to coincide with flood protection and other municipal servicing improvements. In the interim situation, the limited transit service, and access to the Gardiner Expressway and the Don Valley Parkway would likely create a high reliance on auto trips, taxis, and related parking/queuing areas. These conditions have generally been observed at past special events held in the Port Lands, such as the Cirque du Soleil.

#### *2.3.4 Infrastructure*

The existing servicing infrastructure is limited in the Port Lands. The majority of the network is located north of the Ship Channel where there is a network of distribution water mains, local sanitary sewers and local storm sewers. South of the Ship Channel, servicing infrastructure is more limited with storm drainage reliant on open ditches, informal ponding, infiltration and overland flow to the lake. To support development in the Port Lands, it is expected that the area will be fully serviced with a well-distributed servicing network, all integrated with the final flood protection works.

Some servicing capacity is available to accommodate development north of the Ship Channel. However, utilizing some of this existing capacity may limit other interim development or expansion of key uses like new film studio space. A significant amount of infrastructure work would be required in order to provide for development, particularly located south of the Ship Channel.

The key challenge for this area is to coordinate the infrastructure improvements with the ultimate flood protection works within a cost-effective implementation phasing plan that facilitates accommodation of the vision for development. This is necessary in order to minimize throw-away costs associated with development moving ahead of the flood protection works that could influence the final grades of development sites. A detailed servicing study and grading plan is required as part of the submission for future development proposals. The study is to integrate the recommendations from area studies including the Waterfront Sanitary Master Plan, the Don River and Central Waterfront Project, Lower Don Lands Master Servicing Plan and the Don Mouth Naturalization EA.

### *2.3.5 Considerations for a New Casino in the Port Lands*

Should Council consent to a new casino in the C1 zone, a casino gaming floor of 135,000 square feet, as suggested in the City Planning's suggested approach for a new casino in the C1 zone, would be impractical and undesirable in the Port Lands. Moreover, the Port Lands are also not suitable for a new large, integrated entertainment resort complex, as suggested by the OLG.

The vision for the Port Lands is for a live-work community developed in a compact urban form similar to the new communities in the West Don Lands and East Bayfront with the creation of a convergence centre consisting of new media, film studios and green industries. The new communities would be serviced by a network of fine-grained public streets, and parks and open spaces. Moreover, a significant retail and service component comparable to a mid-sized mall, like that proposed by the OLG would not be a suitable use as it does not support the core principles of the vision for the Port Lands.

The provision of flood protection is a prerequisite for development north of the Ship Channel. The lands south of the Ship Channel are remote and lack basic services. The PLAI proposed that the implementation of flood protection be phased in order to improve affordability. It is estimated that it will take a minimum of five years for the completion of Environmental Assessments, Official Plan and Zoning By-law Amendments, etc. before construction can begin in the Port Lands. Furthermore, the phasing strategy developed for flood protecting the north Port Lands still requires significant up front capital costs.

There are also additional costs associated with other major infrastructure needed to support the development that must be addressed before any new development can proceed in the Port Lands. It is unlikely that the infrastructure requirements could be leveraged through a scaled-back casino complex and piecemeal development that is not integrated into a comprehensive approach is not desirable and could set a negative tone for the planned intentions and future development of the area.

In the absence of fully implementing the required infrastructure upgrades, a much higher reliance on the automobile would result, and consequently, the provision of parking would also increase. Given the difficulty in achieving below-grade parking due to a high water table in the Port Lands, this would subsequently result in a need to accommodate extensive surface or above-grade structured parking which is not in keeping with the vision established for the Port Lands and would be contrary to the CWSP.

The public and stakeholder consultation during the PLAI and during earlier planning initiatives has consistently supported developing the Port Lands as a mixed-use community with naturalized recreational and open space amenities as a focal point. A new casino was not specifically consulted on, but feedback received indicates little support for this type of use in the Port Lands. It is likely to be met with substantial concern by the public who participated in the PLAI and contributed to its results.

From a more limited built form perspective, a scaled-back casino complex could potentially be accommodated in a mixed-use building form consistent with providing a compact urban form. However, the area presently lacks any context and amenities for such a facility.

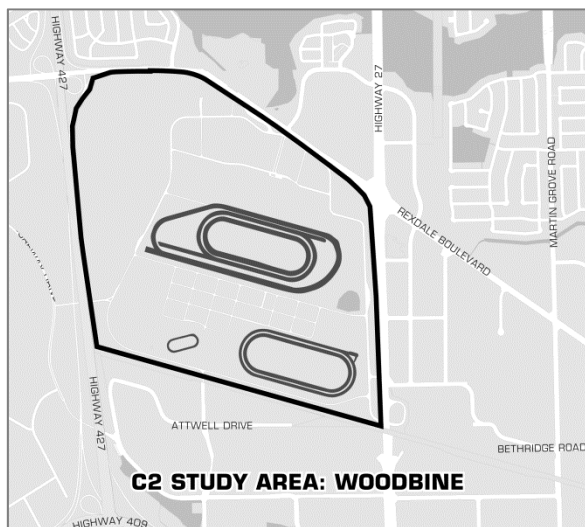
In addition, leveraging expanded convention facilities is not feasible in the Port Lands. The film studio uses located within the Port Lands are large-scale uses envisioned to continue as the focal point of the Film Studio Precinct Plan that is under development. Convention facilities are not contemplated within the vision for the Port Lands. Exhibition Place and the downtown core study area have historically been locations for convention facilities and it is not desirable to establish another competing location.

Waterfront Toronto, the public corporation responsible for implementing plans for the revitalization of Toronto's Central Waterfront area, has expressed concern with the OLG's casino proposal. City staff met with Waterfront Toronto and OLG in February. An overview of the Port Lands Acceleration Initiative, endorsed by Council in 2012, was provided to the OLG by Waterfront Toronto and City staff, which included an overview of infrastructure requirements, timing for development and costs. Waterfront Toronto and City staff also explained the vision for revitalization in the Port Lands with the OLG.

### 2.3.6 Conclusions

The Port Lands are not suitable for a large, integrated entertainment resort complex, as put forward by the OLG. Moreover, a scaled-back casino would be impractical and undesirable in the Port Lands. Should Council consent to a new casino in the C1 zone, a condition in the consent should be included that precludes the Port Lands.

## 2.4 Woodbine



Woodbine Racetrack is an existing entertainment destination in the northwest quadrant of Toronto. The site is comprised of approximately 266 hectares of land, adjacent to major roads and highways, Rexdale Boulevard, Highway 27 and Highway 427. The site is also near to Lester B. Pearson airport.

The site is underdeveloped. Current uses include a grandstand for both the racetrack and the gaming facility, race track and associated back stretch activities including stables and dormitory housing for workers. Woodbine Entertainment Group (WEG) owns and operates the facility. WEG advises that it is the largest horse racing

operator in Canada, and is a key economic driver of horse breeding and racing, the second largest agricultural industry in the Province. The sector generates over 60,000 direct and indirect jobs that account for \$1.6 billion in wages and salaries.

The City has approved a development concept for 112 hectares of the 266 total hectares. The development concept was submitted by a partnership of Woodbine Entertainment Group and The Cordish Company, which has now dissolved. The City approvals for Official Plan amendment, rezoning and subdivision all remain in force and could be implemented at any time. The concept consists of 330,000 square metres of mixed-use development for "destination retail/entertainment" project that builds upon and supplements the horse racing operation and includes a hotel, restaurants, theatres, a live performance venue, and associated amenities.

Phase 1 of the proposal would create a regional entertainment tourist destination that expands on the existing racetrack and gaming facility. Phase 2 would see the development of approximately 2,500 residential units and supporting commercial uses. WEG advises that the proposal is a key component of their financial strategy to maintain the economic viability and competitive position of its existing operation. The proposal will diversify its revenue base, which includes a large area of underutilized land adjacent to the track, and will allow the expansion of its racing and breeding operations. WEG expects more people will visit the racetrack, resulting in increased revenue which will ultimately help to sustain the horse racing facility and the sectors of the rural economy that depend on it.

#### *2.4.1 Planning Framework*

The lands are identified in the Official Plan as an *Employment District* on Map 2, Urban Structure. The site is also subject to Site and Area Specific Policy No. 29 of the Official Plan. *Employment Districts*, shown on Map 2 of the City of Toronto Plan, are intended as areas where new and existing employment clusters that are vital to Toronto's competitive advantage, will be protected and promoted. The Plan promotes a balance between population and employment growth by seeking to create diverse job opportunities that nurture a strong tax base. The Employment Area policies provide for a range of uses including offices, manufacturing, warehousing, hotels, research and development facilities, media facilities, parks, retail outlets ancillary to the permitted uses.

The Woodbine lands are subject to Site and Area Specific Policy (SASP) No. 29 which "provides for new residential and other sensitive land uses provided at the time of rezoning no new residential uses are located within the Transport Canada approved 30 NEF/NEP Composite Noise Contour". SASP No. 29 also recognizes the existing uses on the site by permitting the horse racetrack including housing, dormitories and other noise sensitive land uses and the keeping of horses, required only for the operation of horse racing, and for any related, associated or accessory uses, facilities and services.

The Woodbine lands are also subject to SASP No. 296 that provides the planning framework for "development of the lands will sustain and build on the existing horse racetrack and associated entertainment uses to create a prominent, active, pedestrian friendly commercial retail and entertainment centre and residential neighbourhood; for residents workers and visitors in the Greater Toronto Area".

The land is currently zoned Class Two Industrial (IC.2) within the former City of Etobicoke Zoning Code. The IC.2 zone permits a wide range of industrial uses as well as restaurants, offices, banquet halls, entertainment facilities as accessory uses. Furthermore, in 2007, as part of the development concept for the lands By-law 864-2007, respecting of the Phase I lands, By law 864-2007 was adopted by Council and added retail, business and professional offices, as well as site specific development standards in respect to parking supply, gross floor area and setbacks for the development of the lands as a mixed use entertainment and retail centre.

Slots were introduced to the site in 2000 and there are currently 3,000 slot machines on site. As the Etobicoke Zoning Code and the City of Toronto Zoning By-law did not include a use for casinos, a Minister's Zoning Order, filed as Ontario Regulation 688/98, was placed on the property to permit slot machines at the existing Woodbine Racetrack. The permission for slots at Woodbine was part of the Provincial Program of Slots at Racetracks to support the horse racing industry. Should additional gaming, beyond that stated in the Minister Zoning Order, be approved for Woodbine an amendment to the Ministers Zoning Order or a rezoning amendment to City By-laws would be required to permit table gaming on the site.

In 2007 the City approved an Official Plan Amendment (SASP No. 296), rezoning and draft plan of subdivision for a development proposal of 330,000 square metres of mixed use development for a destination entertainment retail project that builds on and supplements the existing racetrack operations and includes a residential component. The project was proposed to be built in Phases. The draft plan of subdivision was required in order to subdivide the large parcels into smaller blocks that could be built on and provide public roads and infrastructure.

As part of the draft plan of subdivision Draft Urban Design Guidelines have been prepared for the site to guide development and ensure a high quality of development. The guidelines provide direction for: public open space system, pedestrian connections, the role and design of streets, bicycle access, transit, views and view corridors, and gateways; and, built form, including new development and signage.

In 2008, Council approved the Woodbine project as a Transformative Project with a number of conditions. Transformative Projects are only a select few very large and unique projects that would allow the City to achieve multiple goals that have the desired effect of transforming an area's potential. The City approved a Community Improvement Plan (CIP) for Woodbine that include financial incentives (TIEGS), local hiring and training programs, provision of an employment centre, priority hiring, apprenticeship program, public access to amenities including the live venue. The addition of a casino is in keeping with the concept of a Transformative Project and could fit within the approved concept and CIP.

The site is subject to site plan control. While a Master Site Plan Concept approval was been granted in July 2011, detailed site plan applications for each phase or blocks within a phase will be submitted prior to any redevelopment on the site.

#### *2.4.2 General Development Considerations*

Woodbine lands are physically separated from its surroundings, both in the immediate and broader context. Within its immediate context, wide and busy roads create a physical barrier that prevents the lands from being integrated – Rexdale Boulevard presents a physical barrier between the residential neighbourhoods to the north, while Hwy 27 and the rail corridor present barriers to the east and south. While the major street network surrounding the site present physical barriers, these same streets provide the site with good accessibility from the broader City and GTA and provide the site with good visibility, important considerations for the location of a casino. In the broader context, while Woodbine Racetrack is near Lester B. Pearson Airport, it is distant from Toronto's downtown area, a tourist destination. This physical location presents both opportunities and challenges. Its location and underutilization may allow for a more intensive use of the site.

Generally, the Woodbine lands are comprised of large structures related to race track operations, surface parking lots, and large expanses of open space. Currently, there are large areas of vacant and underutilized lands that lack a fine-grain urban fabric. The proposed concept and development framework address these problems. A casino venue could be accommodated on the site consistent with the development framework. An advantage to locating a new casino, as part of the integrated entertainment complex at Woodbine, would be the development of the underutilized site and integration of the site into the larger context and may actually spur development.

Because of the distinct boundaries and ownership of Woodbine, it is relatively easy to look at the area in its entirety. However, the concept approved by Council considers development of the integrated entertainment retail complex on only a portion of the lands, focused around the existing grandstand. Lands south of the grandstand and racetrack were not considered as part of the development concept area. There is ample space to accommodate a casino within the approved development concept area.

Woodbine development framework anticipated the project be developed in phases. Phase 1 focused on the retail entertainment complex with approximately 115,000 square metres of development. While it is anticipated that new public roads and infrastructure will be built to accommodate full build out, some development could occur with existing infrastructure.

#### *2.4.3 Transportation*

Woodbine is not located near higher order transit and is instead serviced by buses operating in mixed traffic on the area road network. Bus service is provided by Toronto Transit Commission with connections to the Bloor-Danforth Subway line. GO Transit, Mississauga Transit and York Region Transit/VIVA also provide bus service to the area. Only TTC currently enters the site with a stop located in front of the main grandstand.

At present, public transit accounts for approximately 7% of all the trips to Woodbine racetrack. This is considered very low and is in part due to the availability of free surface parking and transit schedules geared to provide service during the typical weekday am and pm peak periods, which do not coincide with racetrack operations which have peaks during the evening and weekends.

Improvements to public transit will be a key component to planning for intensification on the site to provide alternatives to the automobile. The nature and extent of transit improvements will be directly related to the proposed development and may include the following:

Improved bus service – with the introduction of new public roads, transit operators currently providing service on the perimeter roads can bring passengers directly to the front doors of new entertainment venues.

Improvements to bus service (route adjustments, increased frequency, express bus service, etc) is considered an improvement that can be delivered in the short term, based on ridership, as development comes on stream with minimal impact on transit operators priorities.

Higher order transit - Metrolinx is currently making a significant investment within the Kitchener GO Rail corridor to upgrade rail service to all day two-way operations. In addition, the Air Rail Link (ARL) is currently under construction and planned to be operational in 2015.

The City's Official Plan identifies a future GO Station near Hwy 27 and the rail corridor. With the ARL, the potential for a combined stop to service Woodbine and the surrounding area is a more viable option. Initial, high level, discussions have occurred with Metrolinx over the years as redevelopment opportunities on Woodbines lands have been reviewed. A GO/ARL stop is not a requirement for a Casino, but, could provide a basis to attract customers laying over near Lester B. Pearson Airport.

Finch West LRT – Phase 1 of the Finch West LRT project is expected to run between the planned Keele Subway Station on the York Spadina Subway Extension to the Humber College Campus located on Hwy 27, just south of Finch Avenue West. Metrolinx plans to have this line in service by 2020.

A long term vision, and one that City Council directed staff to address, is extending the LRT from the planned terminus at Humber College southerly to link up with the Eglinton-Crosstown LRT project at Lester B. Pearson Airport (creating a looped system). A Transit Environmental Assessment will need to be undertaken to determine, among other things, the preferred alignment for a LRT extension. Alignments that pass-by or through the Woodbine site may be considered which would significantly improve transit accessibility to these lands.

This extension is currently unfunded and has not been identified as a priority in the City's transit expansion plans. This service is not required to support a Casino at Woodbine, but, is something that would help improve the transit model share in the future.

### *Parking*

The site is subject to By-law 864-2007 which specifies the following parking rates:

- Hotel – min of 1 space per guest suite
- Racetrack and Gaming – 3,750 spaces
- All other uses – 3 spaces per 93 square metres



In addition, the by-law specifies the minimum number of parking spaces to be maintained on the lands shall be 0.7 times the sum of the aggregate total calculated above. This reduction is based on parking spaces being shared between the uses on site and the different peaks in demand.

The Site Specific By-law parking requirement of 3,750 spaces is for a grandstand seating capacity of 8,878 and the existing casino facility. The existing parking on site is 10,500 parking spaces.

#### *Submission Requirements*

As part of major redevelopment plans within the City, the proponent is required to undertake detailed assessments related to the impacts to the transportation network. These studies will include: transportation demand management plans; traffic operational assessment; transit strategy; parking study; loading; bicycle and pedestrian circulation plans.

#### *2.4.4 Infrastructure*

There is very limited existing servicing infrastructure within the Woodbine site. Connections to the City's servicing infrastructure network can be made at the north, east and south edge of the site. Hwy 427 at the west edge of the site limits access to the adjacent servicing infrastructure. Watermains and sanitary sewers exist along Rexdale Blvd, Hwy 27 and south of the CNR tracks. There is a diverse storm drainage network that drains the area via overland flow routes, culverts, and storm sewers, that ultimately outlet to nearby Mimico Creek and the west branch of Humber River. There is also a private pond that captures runoff from a portion of the site that is used for irrigation.

A network of new internal infrastructure is required to service the site. While there is some available capacity in the existing external infrastructure, some improvements may also be necessary depending on the size of the future venue. A previously submitted Functional Servicing Study in support of the Woodbine Live! Development proposal for an integrated entertainment complex, high density residential and 'big box' retail situated north of the racetrack identified servicing upgrades that included pipe size increases for watermains and sanitary sewers, in addition to a new sanitary sewer on Carlingview Drive to connect to the City sewer south of the CNR tracks.

Further detailed review of the servicing infrastructure is required to determine the necessary upgrades required in support of the future proposal taking into consideration the City's existing standards and guidelines. Regardless of findings, a sanitary sewer on Carlingview Drive crossing the CNR tracks will be necessary to provide sanitary service to part of the site. This would reduce overall project cost and minimize public disruption.

#### *2.4.5 Considerations for Expanding Existing Casino Facilities at Woodbine*

The planning framework for Woodbine supports both the current gaming (slots and electronic games) as well as a potential full-service casino (slots and tables) use in this area. Woodbine currently houses 3,000 slots and electronic games on site. WEG recently completed a \$100M

renovation to accommodate additional electronic table games including roulette, poker and blackjack.

The vision for growth and change in Woodbine anticipates a broad range of unique entertainment and retail type uses, namely gaming, racetrack, hotel, convention facilities, live theatre venue, retail as well as future offices and residential. The plan directs that this growth and change should be phased to ensure that it is undertaken in a comprehensive manner addressing the transportation, infrastructure, public realm and design requirements outlined in the Site and Area Specific Policies 296 of the City's Official Plan. The design conditions that have been developed as part of the City's consideration of casinos should be applied to any future casino and entertainment centre expansion at Woodbine. The vision to break up large sites into a more urban street and block pattern, the establishment of public streets will help connect the site to surrounding area and the provision of public amenities will create an attractive environment for both the casino and any other development. Furthermore, any future development of these lands should also include other uses such as entertainment and retail that could leverage additional economic benefits to the broader Rexdale community.

#### 2.4.6 *Conclusions*

The planning framework for Woodbine supports both the current casino (slots and electronic table games) as well as a potential expansion to include live-dealer table games. The potential advantages to expanding casino facilities at Woodbine from a citywide perspective includes:

- the potential for additional development on this underutilized site,
- opportunities to better integrate the site into the larger context;
- the potential to spur development related to the approved plans;
- it would not destabilize adjacent areas;
- uses, built-form and scale are more easily accommodated and impacts are more easily mitigated;
- the expansion, both in the interim and with the westward addition, has the potential to create local employment opportunities for residents of the nearby neighbourhoods in the short-term, with full-build out of the entertainment complex additional employment opportunities would be created; and
- given the proximity of the site to Pearson International Airport, the facility could attract travelers waiting for connecting flights, and in particular if enhanced transit accessibility to/from the airport is achieved.

Should Council consent to an expansion to the existing facility to include live-dealer table games, suggested detailed directions are included in Section 4.

### 3. CITY PLANNING APPROVAL PROCESS AND TEMPORARY CASINOS

#### 3.1 City Planning Approval Process

Should Council pass a resolution consenting to the establishment of a casino in the C1 zone subject to entering into an agreement with the City, there would be an intermediary step requiring OLG to provide information to the City Manager to assess how City conditions will be met by the OLG and the proponent. In addition, options with respect to the size, location and design of the casino would be provided. There would be a further report to City Council, advising on whether the conditions will be satisfied and how these conditions will be secured. City Planning have identified the minimum required information needed to review whether the conditions have, or will be, satisfied in Section 4.4 of this appendix.

Upon considering the further report by the City Manager, and if City Council is satisfied with how the proponent intends on meeting the conditions, Council will not seek to request the Minister of Finance to deny the OLG's business case. The proponent would then be required to submit required *Planning Act* application(s), including supporting documentation. Likewise, if the OLG agrees to expand casino facilities at Woodbine, some planning approvals may be required. All planning approvals are subject to potential appeal to the Ontario Municipal Board.

Where a rezoning or Official Plan amendment would be required, additional public consultation on the proposal would be undertaken by City Planning staff in accordance with the City's standard practices. Ensuring that the City's planning approvals process is respected is critical in terms of providing for additional analysis and studies, and revision as necessary, to support the new use as well as to provide additional opportunities for consultation and Council direction. The City also has the opportunity to utilize holding provisions, where applicable, to ensure critical conditions are secured. The proponent will be required to pay all associated application fees, and any increases in height and/or density could be subject to Section 37 of the *Planning Act*.

##### 3.1.1 Exhibition Place

Section 406 of the *City of Toronto Act, 2006*, contains provisions respecting Exhibition Place that entrusts its management and operations to the Board of Governors. Section 406 (2) of the *City of Toronto Act, 2006*, outlines the use of the lands known as Exhibition Place as follows:

#### "Use of Exhibition Place

- (2) Exhibition Place shall be used,
- a) for parks and exhibition purposes;
  - b) for the purposes of trade centres and trade and agricultural fairs such as, but not limited to, the annual Canadian National Exhibition and Royal Agricultural Winter Fair;
  - c) for displays, agricultural activities, sporting events, athletic contests, public entertainments and meetings;
  - d) for highway, electrical transmission or public utility purposes;
  - e) for any other purpose that the City may approve."

With respect to a casino at Exhibition Place, Section (e) would apply and City Council would have to specifically approve of this use on the Exhibition Place grounds. Moreover, given the statutory provisions in the Act with its broad use permissions, the former City of Toronto Zoning By-law (Zoning By-law 438-86), as amended, is considered not to apply to development at Exhibition Place.

Prior to the June 8, 2012 enactment of the new harmonized Site Plan Control By-law for the City (By-law No. 774-2012), development at Exhibition Place was not subject to the site plan approval process. Rather, it was subject to a site plan consultation protocol, whereby there is only a consultation, not approval, process for development at Exhibition Place. The previous Site Plan Control By-law that applied to the Exhibition Place lands contained specific provisions exempting the lands from Site Plan Control. The new harmonized Site Plan Control By-law no longer includes this exemption. New development on Exhibition Place lands are now subject to Site Plan Control.

In the event that a site is selected that is designated *Parks and Open Space Areas* or that substantially diminishes the planned Festival Plaza site, an equivalent site for replacing the park or planned open space would be required and an Official Plan Amendment may be required. Should a large, resort-styled complex, as contemplated by the OLG, be consented to, precinct planning and Official Plan Amendments would be required as this type of development would be a complete departure from the planned function of this area.

#### *Lease*

If Exhibition Place is the chosen location for a proposed casino, the City would likely want to structure the land transaction as a lease. In order to address the lack of traditional zoning on Exhibition Place (i.e. in light of the statutory allowable uses provision in the *City of Toronto Act, 2006* for Exhibition Place), such lease document could contain certain of the controls which would otherwise be included in a zoning by-law such as permitted uses and parking requirement, as well as the requirements to seek and obtain the City's consent to proposed building plans and specifications. While a lease could also deal with height restrictions, such issue could be more effectively controlled by "stratifying" the leased lands to the maximum height desired.

However, the distinction of embodying the planning/zoning type requirements in the lease (i.e. rather than through the normal planning/zoning regulatory system), means that the entire leasing relationship is built on an intense, contentious negotiation process which would undoubtedly import standards of "reasonableness" on the City (including with respect to approval of plans and drawings), which is different than pre-set standards of an imposed regulatory scheme. In addition, in the event of a breach, the City would not have its normal regulatory powers as remedies but, rather, would have to undertake costly and, more importantly, time-consuming, court action to resolve disagreements on the interpretation of the terms of the private lease contract.

A lease for a casino at Exhibition Place would be subject to any underlying title issues, as well as subject to any pre-existing contractual entitlements of other tenants on the Exhibition Place grounds (eg. exclusivity provisions).

### *3.1.2 Downtown Core Study Area*

A rezoning application would be required if Council determines that a casino use could be located in this area. There are no provisions in the former City of Toronto By-law, By-law No. 438-86, that would permit a casino. Depending on the mix of uses, density, heights, setbacks and other performance standards of a particular development proposal, other amendments to the By-law may be required. As the OLG does not have a proponent or specific proposal for a site, a detailed review, through the City's planning process including additional consultation, is required. Site Plan Control would also apply and any other necessary planning approvals would have to be determined once there is a specific proposal for a site.

### *3.1.3 Woodbine*

The Woodbine lands are currently zoned Class Two Industrial (IC.2) within the former City of Etobicoke Zoning Code. The IC2 zone permits a wide range of industrial uses as well as restaurants, offices, banquet halls and entertainment facilities as accessory uses. Furthermore, in 2007, as part of the development concept for the lands, By-law 864-2007 was adopted by Council with respect to Phase I of the lands, which added retail, business and professional offices, as well as site specific development standards in respect to parking supply, gross floor area and setbacks for the development of the lands as a mixed use entertainment and retail centre.

Slots were introduced to the site in 2000 and there are currently 3,000 slot machines on site. As the Etobicoke Zoning Code did not include a use permission for casinos, a Minister's Zoning Order, filed as Ontario Regulation 688/98, was placed on the property to permit slot machines at the existing Woodbine Racetrack. The permission for slots at Woodbine was part of the Provincial Program of Slots at Racetracks to support the horse racing industry.

Should additional gaming, beyond that stated in the Minister's Zoning Order, such as live dealer table games, be approved for Woodbine, an amendment to the Ministers Zoning Order or a rezoning amendment to the applicable By-law would be required to permit table gaming on the site. However, it is recommended that a Zoning By-law Amendment application be required to deal comprehensively with the site, casino permissions and related performance standards, like parking.

Other planning approvals that may be required include finalization of the Plan of Subdivision application which received draft approval in 2007 as part of the Woodbine Live application. A Site Plan Control application would also be required to be submitted for an addition to the existing building or for any new buildings. Repurposing of existing floor area to accommodate an interim expansion of casino floor area may not require a Site Plan Control application. As previously noted, holding provisions are another tool that could be utilized which would ensure critical conditions are secured.

### 3.2 Temporary Casino

The Executive Committee at the November 5, 2012 meeting requested the City Manager to report on the possibility of a temporary casino in Toronto. The OLG has stated that as soon as the City of Toronto or another municipality has passed a resolution supporting the establishment of a gaming site, the agency could seek to establish a temporary casino while the preferred proponent selected through the OLG's RFP process obtains planning and permit approvals and during construction.

City Planning staff do not recommend that a temporary casino be established in the C1 zone. There is no need for a large temporary casino in the downtown and it would raise the same issues as a permanent facility, if not more. It would have similar transportation and parking concerns and potentially more. The City should not entertain a temporary structure to accommodate this type of facility. There is also the potential risk that a temporary casino could become a permanent fixture, despite the Province's current indication that only one new casino will be entertained in the C1 zone. Moreover, the Woodbine facility, which has a large slot operation currently, does not necessitate the need for a temporary casino in the City. Expansion, as indicated previously in this report, could be accommodated within the planned vision for the area.

Should Council consent to host a new casino in the C1 zone, it should indicate its intentions with respect to a temporary casino. Likewise, if City Council determines to entertain a temporary casino in the C1 zone, the following is provided for consideration:

- The temporary casino should be directed to be located within the existing hotels or buildings with a focus on only tables or very minimal slots. An approach similar to London, England would be ideal where most casinos are small facilities with under 50 tables and 50 slot machines and are located in existing buildings.
- A Temporary Use By-law application, as provided for in Section 39 of the *Planning Act* should be a requirement for a temporary casino in the C1 zone. A Temporary Use By-law defines an area to which it applies, as well as specifies a period of time for which the By-law applies, which is not to exceed three years. There is some capability to extend the temporary use through a separate application and prior to the Temporary Use By-law lapsing. Only one extension of an additional 3 years may be considered.
- A Site Plan Control application should also be a requirement, despite the recommendation to locate the facility in an existing building. Section 41 of the *Planning Act*, defines development to include the alteration to a building or structure that has the effect of substantially increasing the size or usability of a site. As such, introducing a new casino use would be considered development and matters related to location and design of parking facilities should be addressed through a comprehensive review by City staff.

## 4. PLANNING DIRECTIONS

Should Council consent to host a new casino in the C1 zone and/or to expand the existing facility in the C2 zone to allow for live-dealer table games, the following directions are suggested to be included as part of the consent and will also inform the review of planning applications. As there is no development application for a specific site, area specific directions are also included. Additional requirements for other studies and documentation may be identified as part of the development review process and would be required to be submitted as part of a complete development application.

### 4.1 Overall Directions

Should City Council consent to a new casino in the C1 zone, City Planning suggests the following overall directions:

1. For a casino located in the C1 zone:
  - a. A scaled-back casino that does not exceed 1,500 slot machines and/or 400 live-dealer table games and is not to exceed a gaming floor area of 135,000 square feet and a total gross floor area of 175,000 square feet inclusive of casino-related back of house functions and lobby areas;
  - b. The development will have an urban form that is designed to fit within its local context, which could include distributing the casino floor area on multiple levels where appropriate;
  - c. Limited ancillary food/beverage and retail uses associated with a casino up to 100,000 square feet;
  - d. The provision of convention space to bring Toronto to within reach of the top ten convention destinations in North America must be provided with a casino use and this should be secured through a legal agreement containing obligations to construct a convention centre prior to or commensurate with a new casino use;
  - e. Detailed directions as outlined in Section 4.2 – Citywide Detailed Directions – of this appendix including general and study area specific conditions, relating to design, transportation, infrastructure and other potential uses proposed in association with a casino; and
  - f. That the Ontario Lottery and Gaming Corporation include the above conditions in its Request for Pre-Qualification, Request for Proposals and subsequent agreements.
2. That City Council not support the establishment of a new casino in the Port Lands area of the OLG C1 zone.

3. For a casino in the C2 zone, an expansion plan for the Woodbine casino, including additional slot machines and the introduction of live-dealer table games to support the international calibre race track at Woodbine in accordance with the directions identified in Section 4.3.4.
4. That City Council not support the establishment of a temporary casino in the OLG C1 zone.
5. Any new casino or expansion of existing facilities in the City of Toronto must comply with the City of Toronto's planning process, including Council approval, and that Provincial Ministerial Zoning Orders are not to be utilized.
6. When the OLG has selected a proponent, a report will be provided to the City which will include the minimum information prescribed in Section 4.4 – Council Intermediate Decision Requirements. The intermediate decision by Council will be assessed on whether the proposal proposes to or will achieve the City's conditions. The proponent agrees and acknowledges that the City's review is preliminary. Additional requirements may be identified as part of the development review process.
7. When the OLG has selected a proponent and development applications are submitted to the City, if the proposal does not adequately demonstrate that physical, transportation and infrastructure impacts are appropriately mitigated or that modifications proposed to mitigate impacts are not acceptable to City Council, the OLG agrees to reduce the number of slot machines and table games accordingly, and the proponent agrees to reduce the size of the non-casino elements accordingly.

## **4.2 Citywide Detailed Directions**

### *4.2.1 Planning and Design:*

- a) A casino proposal in the City of Toronto must conform to the Official Plan and achieve consistency with City policies and guidelines respecting planning, development and design including the following:
  - Provide high quality architecture and urban design and that provides animated and active uses at grade.
  - Provide an architectural design that is consistent with the character of existing/planned development in the vicinity of the selected site and that has a density, scale, height and built form suitable for the site.
  - Ensure the project's design contributes to the city skyline while respecting existing landmarks and vistas and addressing transition.
  - Enhance the public realm in the vicinity of the project.



- Ensure signage is of a high quality design and that it does not detract from the visual appearance of the architecture and character of the surrounding area.
  - Implement best practices and innovations for green design.
  - Address the provision of linkages with and between other public spaces, including enhancements to existing public spaces.
- b) City Planning utilized the following assumptions for assessing the casino use and as provided by the OLG: 30 square feet per slot machine and 225 square feet per table game. The City will seek to secure these matters.
- c) The proponent will be required to present the proposal to the City’s Design Review Panel and make revisions as appropriate. The design is to be consistent with the feedback provided.

#### *4.2.2 Moderating Impacts on Existing Shopping Areas*

- a) Undertake an Economic Impact Assessment addressing the impact to the local area and the City and pay for the costs to have the assessment peer reviewed.
- b) Provide an Event Management Plan which identifies proposed entertainment options and coordination with other events occurring in proximity to the site.

#### *4.2.3 Transportation & Infrastructure*

- a) A transit-focused approach that minimizes parking is required.
- b) Transportation and infrastructure costs/upgrades need to be determined and appropriately funded by the proponent. Funding for all transit, parking and transportation improvements must be paid fully by the proponent and must not adversely influence current or future City transit funding priorities.
- c) A transportation study (pedestrian, cycling and vehicular) which at a minimum addresses:
- Traffic generation and any upgrades to the transportation system required to support the development;
  - Strategy for coach, taxi, shuttle bus, service, delivery and emergency vehicle movements; and
  - Provision of a parking rationale which minimizes parking and takes into account nearby transit services
- d) A Transportation Demand Management Plan to encourage use of transit and other transportation modes for both employees and visitors.
- e) Vehicle and pedestrian conflicts will be minimized by locating vehicular accesses away from major pedestrian routes.

- f) An infrastructure strategy that addresses servicing requirements is required and includes the submission of a Functional Servicing Study outlining the infrastructure works (internal and external to the selected site) necessary to support the development. The study is to address water consumption, sanitary and storm drainage, and the construction phasing of the infrastructure improvements, in accordance with the Servicing Report Terms of Reference in the City's Development Guide.
- g) The proponent will be required to address existing capacity and requirements for other utilities. Should any upgrades be required, these will be appropriately funded by the proponent.

### **4.3 Study Area Specific Detailed Directions**

#### *4.3.1 Exhibition Place*

- a) The size of the new casino facility is to be limited to that of the overall directions (a maximum of 135,000 square feet of casino gaming floor with slot machines and table games regulated for a total footprint of 175,000 square feet with back-of-house functions), which calls for a profile, form and size that is in keeping with the character of the area.
- b) Heritage resources (buildings/structures, landscapes, and archaeological) must be conserved and enhanced, including maintaining views to existing heritage buildings.
- c) New convention space/trade show space must be provided as part of new development to supplement existing space in accordance with plans developed by Exhibition Place and to reflect citywide objectives for convention expansion.
- d) New connections, (pedestrian, cycling, vehicular, and transit) to the adjacent and broader areas will be required and the cost of these improvements, whether required or voluntary, will be at the sole cost of the proponent. Financial securities for required or voluntary improvements will be required to ensure the provision of the connections.
- e) The value of landscape, open space areas is integral to the campus like setting of Exhibition Place. No net loss of landscape, open space areas should be permitted. The loss of planned open space is not desirable (i.e. Festival Plaza). Any development proposed within the Festival Plaza or loss of existing landscaped, open space areas, will be required to develop a strategy that accommodates this function elsewhere within the Lands to the satisfaction of Exhibition Place's Board of Governors and the Chief Planner and Executive Director, City Planning.
- f) A new, permanent casino proposal will be required to submit a strategy outlining how the current and planned programming will be accommodated, including addressing quality of alternative space provided for the existing programs and events to the satisfaction of Exhibition Place's Board of Governors and the Chief Planner and Executive Director, City Planning.

- g) Given the unique layout and dynamic nature of the Exhibition Place lands and the limited number of undeveloped parcels, other amenities proposed with a new, permanent casino may be required to be located on multiple parcels within Exhibition Place.
- h) Ancillary retail and service uses are to be provided generally at grade along public frontages with entrances provided directly from grade. The amount of ancillary retail and service uses may be reduced if the resulting development is inconsistent with planning and development objectives for Exhibition Place.
- i) A proposal for a new, permanent casino would require a review of the existing and projected capacity of the road and transit network, parking infrastructure, and sidewalk capacity. Should a casino be proposed for this location, a full review of the existing and planned transportation and public transit system would be necessary through the review of a Site Plan Control application.
- j) A comprehensive review of parking requirements for the functions and programming at Exhibition Place is required. Parking provision will reflect Exhibition Place's demand and the resulting demand from a new casino. If the specific site is an existing surface parking lot, new and/or replacement parking will be located below-grade in accordance with the planning framework for Exhibition Place.
- k) New pedestrian connections to buildings/structures and transit stops will be weather protected.

#### *4.3.2 Downtown Core Study Area*

- a) The size of the new casino facility is to be limited to that of the overall directions (a maximum of 135,000 square feet of casino gaming floor with slot machines and table games regulated for a total footprint of 175,000 square feet with back-of-house functions), which calls for a profile, form and size that is in keeping with the character of the area.
- b) The form and scale of the development will be consistent with the City's built form policies and any applicable guidelines including those for tall buildings. A base building of three- to four-storeys is desirable with a tall building element appropriately set back from the base building.
- c) New convention centre space of sufficient size to better position Toronto globally in its ability to host large conventions and meetings is required. This space could be provided as an addition to the existing Metro Toronto Convention Centre, or as a new building. In both instances, achieving the total amount of contiguous exhibit space, total exhibit space and provision of meeting rooms/ballrooms identified in the Operating Plan will be required. For new convention space, it will reflect the strategy adopted in 1994 for the expansion to the Metro Toronto Convention Centre, which locates a considerable amount of floor area below grade.

- d) New arts and culture venues are desirable, but their size is to be limited and impacts minimized. This will be demonstrated through the submission on an event management plan and market analysis of impacts on existing theatre spaces.
- e) Ancillary retail and service uses are to be generally located at grade with frequent individual entrances provided directly from the municipal sidewalk. Wider sidewalks and setting buildings back where public streets are narrow may be required to create a more interesting, animated and safer street environment.
- f) A proposal for a new casino would require a review of the existing and projected capacity of the road and transit network, parking infrastructure, and sidewalk capacity. Should a casino be proposed in the downtown core study area, a full review of the existing and planned transportation and public transit system would be necessary through the review of a rezoning application.
- g) Where the selected site is within close proximity to the City's PATH system, enhanced PATH connections will be provided.
- h) Heritage resources (buildings/structures, landscapes, and archaeological) must be conserved, including maintaining important views.

#### 4.3.3 *Port Lands*

- a) The Port Lands is to be precluded from further consideration.

#### 4.3.4 *Woodbine Study Area*

- a) In addition to the provisions required through the Site and Area Specific Policies 296 of the City's Official Plan, we would also want the following to be addressed should OLG pursue expanded gaming at Woodbine:
  - Any casino development would need to address the approved Community Improvement Plan for community economic development and align with the objective of creating a transformative project for this area of the city.
  - Project should build upon and support the international calibre race track operations at Woodbine.
  - A proposal for a large venue such as a casino would require a review of the existing and projected capacity of the road and transit network, parking and infrastructure. Should a casino be proposed for this location, a full review of the existing and planned transportation, infrastructure and public transit system would be necessary,
  - New connections (pedestrian, cycling, vehicular, and transit) to the adjacent and broader areas will be required.

- Appropriate and supportable levels of retail (other amenities) will have to be included as part of any casino development.
- Urban Design considerations following the Draft Urban Design Guidelines for Woodbine including the break-up of large site into urban streets and blocks, provision of public streets which connect to the surrounding area and the larger greater city, creating a comfortable and attractive pedestrian environment, provision of public open space and upgrading of surface parking areas.

#### 4.4 Plans/Documents Required for Step 2 of Decision Process

The post procurement report from the OLG to the City Manager will provide preliminary plans and supporting documentation outlined below for an entertainment complex with casino floor areas of 135,000 square feet and up to 175,000 square feet in accordance with recommendation # 1(a)(iii) of the cover report. The City Planning Division in consultation with other divisions and agencies will review the materials and determine whether the conditions are, or will be, satisfied.

<b>Plans/Documents</b>	
Preliminary Plans	<ul style="list-style-type: none"> <li>• Perspective drawings</li> <li>• Computer generated building mass model</li> <li>• Concept Plan showing the proposals in relation to streets, parks and other major open spaces, adjacent buildings etc.</li> <li>• Conceptual Site Plans and Floor Plans</li> </ul>
Planning Rationale	<p>Provide a planning rationale which, at a minimum, addresses:</p> <ul style="list-style-type: none"> <li>• A site analysis and description of the existing development and surrounding context</li> <li>• Location of the site(s), size of specific site(s) and any ownership/title restrictions</li> <li>• An overview of the entertainment complex, including major statistics (i.e., mix of uses, floor area for each of uses, height, density, parking, number of slot machines/table games proposed)</li> <li>• An overview of Official Plan policy and other planning documents established for the subject site(s) and statements indicating how Official Plan policy and the planning framework for the specific site(s) is being addressed</li> <li>• Character of development in the surrounding area and how the design option(s) are consistent with the character of existing development</li> <li>• Preliminary analysis of views and vistas. Where a site has, or is located adjacent to, heritage resources, indicate how these resources will be appropriately conserved</li> <li>• Details on the interface between the building siting and existing/proposed public open spaces</li> <li>• Improvements (publicly accessible open space, transportation, infrastructure, other) proposed as part of the two design options</li> <li>• Details of the proposed staging/phasing of the project</li> <li>• Outline environmental sustainable measures to be included</li> </ul>

<p>Transportation Rationale</p>	<p>Provide a transportation rationale prepared by a qualified transportation consultant which, at a minimum, addresses:</p> <ul style="list-style-type: none"> <li>• Transportation context and capacity of existing street/transit network</li> <li>• Relevant Official Plan policies</li> <li>• Determines the likely transportation requirements for the entertainment complex including the methodology established for determining the requirements</li> <li>• Preliminary evaluation of transportation impacts (pedestrian, cycling, transit and vehicular)</li> <li>• Preliminary identification of transportation system improvements proposed to mitigate adverse impacts</li> <li>• Assessment of parking recognizing that the City is requiring a transit focused approach to minimize parking for both employees and visitors</li> <li>• Provide preliminary details of anticipated coach, taxi, shuttle bus, delivery and emergency vehicle access</li> <li>• Provide preliminary TDM measures to be implemented</li> </ul>
<p>Servicing Infrastructure and Utility Rationale</p>	<p>Provide a servicing infrastructure and utility rationale prepared by a qualified engineer which, at a minimum, addresses:</p> <ul style="list-style-type: none"> <li>• In consultation with relevant agencies, address the existing capacity and requirements for water, storm and sanitary servicing, as well as electricity, telecommunications and gas</li> <li>• Indicate what upgrades are required</li> </ul>
<p>Statement of Intent</p>	<ul style="list-style-type: none"> <li>• Provide a statement of intent with respect to the conditions noted in Appendix A, including an indication of how the proponent will satisfy the respective conditions</li> </ul>
<p><b>Other Requirements to be Satisfied with the Consent Submission</b></p>	
<p>Design Review Panel</p>	<ul style="list-style-type: none"> <li>• The preliminary design for the specific site(s) are to be presented to the Design Review Panel. Feedback from the Design Review Panel will be included in the City Manager's report to City Council</li> </ul>