October 23rd, 2012

Jennifer Keesmaat
Chief Planner and Executive Director, Toronto City Planning
12th Floor, East Tower
100 Queen St. West
Toronto, ON M5H 2N2

Dear Ms. Keesmaat:

Re: Planning Implications of a Casino on the Port Lands Acceleration Initiative (PLAI)

This letter is provided in response to the direction from the Toronto and East York Community Council on October 10th, 2012, that Waterfront Toronto and City Planning examine and advise on the planning implications of a casino on the Port Lands Acceleration Initiative (PLAI). Waterfront Toronto, in partnership with the City of Toronto and the Toronto Region Conservation Authority, recently completed a year-long study to identify ways to accelerate revitalization of the Port Lands and deployment of the lands for maximum benefit to the city’s overall growth and prosperity. The recommendations of that effort were unanimously supported by City Council in October, 2012.

Casinos or gaming establishments were not given consideration as part of the PLAI review, as they were deemed not consistent with the existing Waterfront Secondary Plan that calls for mixed-use development throughout the area. No fiscal or technical planning analysis was done to assess the potential impact of a casino on the Port Lands. From a land-use planning perspective, the requirements of a casino in the Port Lands would likely conflict with the vision of a vibrant, urban mixed-use environment like those that characterize Toronto’s best existing neighbourhoods, including healthy retail main streets, a mix of uses and incomes, commercial offices and businesses, provision of schools and community centres, relatively high density development in a mix of predominantly mid-rise buildings, and a strong sense of place.

Casinos introduce challenges to achieving this vision. From a built form perspective, they tend to be land-consuming, low-density, and inwardly-oriented rather than contributing to active street life. They require parking for as many as 5,000 cars or more, which given the sub-soil constraints in the Port Lands means they will either be in surface lots or large structured parkades, neither of which are consistent with best practices in place-making. The heavy demand for automobile access will require greater road capacity into the Port Lands than was contemplated in the PLAI, which had assumed a more transit-oriented modal split for new development. This may in turn divert some of the required transit funding to roadways. From a land-use compatibility perspective, a gaming complex would diminish the desirability of adjacent lands for new residential development, potentially undermining the ability to match the costs of environmental and flood protection works with revenue streams. If the complex includes extensive entertainment venues, it could also reduce market demand for these uses...
Attachment 1: Letter from Waterfront Toronto

elsewhere in the city. Lastly, both the PLAi and the previous Lower Don Lands Plan were informed by years of public discussion that did not anticipate a casino, so its introduction now would require further consultation.

I trust that this provides sufficient information regarding the planning implications of a Port Lands Casino on the Port Lands Acceleration Initiative. With best regards and appreciation for all efforts on this very important file.

Sincerely,

[signature]

John Campbell
President and Chief Executive Officer

cc: Chris Dunn, Waterfront Secretariat