



PLANNING AND URBAN DESIGN

24 March 2022

Planning and Housing Committee
City of Toronto
100 Queen Street West
Toronto ON M5H 2N2

By email only to phc@toronto.ca

Attention: Nancy Martins, Administrator

Dear Members of Planning and Housing Committee and City Council,

**RE: Our Plan Toronto: Draft Major Transit Station Area Delineations
Agenda Item PH32.7
Woodbine Entertainment Group
555 Rexdale Boulevard
WND File No. 16.562.07**

Walker, Nott, Dragicevic Associates Limited (“WND Associates”) has been retained as planning consultants by Woodbine Entertainment Group (“Woodbine”) with respect to their lands known municipally as 555 Rexdale Boulevard in the City of Toronto (the “Subject Site”). We have been involved in the processing and approval of several development applications on the Subject Site and are also currently retained to assist in the employment area conversion request for the Subject Site, which was submitted on behalf of Woodbine on 30 July 2021, through the City-initiated Municipal Comprehensive Review (“MCR”) process during the City Council-approved window to receive conversion requests (City Conversion Request No. 074).

This letter has been prepared by WND Associates, in consultation with Davies Howe LLP and RDLandPlan Consultants Inc., to provide comments on the City Planning staff report *Our Plan Toronto: Draft Major Transit Station Area Delineations*, dated 4 March 2022 and its *Attachment 4: Draft OPA 575 – 40 MTSAs City-wide*.

On behalf of Woodbine, we thank City staff for the opportunity to consult on the draft delineation of the planned Woodbine GO Station major transit station area (“MTSA”), included as proposed Site and Area Specific Policy (“SASP”) 758 in Schedule “39” to Draft Official Plan Amendment (“OPA”) 575. We understand that a further staff recommendation is likely to be considered by Planning and Housing Committee and Council later this year, either in advance of the Growth Plan conformity deadline established by the Ministry of Municipal Affairs and Housing, or as potentially altered by the Province in response to the City’s request for an extension of the deadline.

Woodbine has been consistent in its various submissions to the City and the Province regarding the planning policy framework applicable to the Subject Site, that the proposed Woodbine GO Station and expanded permissions for mixed use development, including residential uses, is needed to provide for transit-supportive densities and serve as a catalyst for the development of additional employment uses on the Woodbine lands beyond those currently in place as a result of the Woodbine Racetrack operations and the under construction integrated entertainment complex. The development contemplated by the conceptual master plan for the Subject Site, which accompanied the employment area conversion request, would result in transit-supportive density across the lands above the minimum targets set by the Growth Plan. In our opinion, closer alignment of the MTSA delineation with the plans and studies supporting the employment area conversion request would represent good planning for the Subject Site and better facilitate comprehensive review of future development applications for the lands.

We agree with City staff that a significant area in the southeast of the Subject Site, specifically in the area north of the Metrolinx rail corridor and west of Highway 27, should be included in an MTSA delineated on the Woodbine lands in the Official Plan. We also agree that the minimum population and employment target of 150 residents and jobs combined per hectare is in accordance with the minimum density target for MTSA served by the GO Transit rail network as found in Policy 2.2.4.3.c) of A Place to Grow: Growth Plan for the Greater Golden Horseshoe (the "Growth Plan"). We further note that there are unlocked opportunities for greater density on the Subject Site to optimize the privately initiated investment in higher order public transit through the construction of the Woodbine GO Station.

It is our understanding that the Treasury Board has approved an arrangement between Metrolinx and Woodbine that will result in the construction of a privately funded GO Station and associated facilities on and adjacent to the Subject Site. Metrolinx and Woodbine (with its development partners) are undertaking the necessary planning and design work to build the future Woodbine GO Station, which has long been recognized as an Expansion Element of the City's higher-order transit system under the Official Plan. It is our further understanding that under the agreement between Woodbine and Metrolinx, Woodbine would build and pay for the Metrolinx train station and turn the station over to the Province, once completed.

We would note that on 5 May 2021 City Council requested that City staff in the Transit Expansion Office and City Planning, in consultation with the Toronto Transit Commission, report on the feasibility of expanding the Finch West LRT south to connect to the Kitchener GO Line to a terminus on the Woodbine lands adjacent to the rail corridor.

As indicated in the Planning Rationale Report which accompanied Woodbine's employment area conversion request, the Subject Site is subject to SASP 29 which already recognizes specific areas of the Airport Operating Area ("AOA") within the southeast quadrant of the Subject Site for residential use permissions. The other areas in the southeast of the Subject Site outside of the AOA, and therefore not subject to SASP 29, are also outside of the Transport Canada approved 30 NEF/NEP Composite Noise Contour and share the same general characteristics and planning considerations as the adjacent areas which are within the AOA. These lands are proposed to contain the Woodbine GO Station.

In our view, an expanded MTSA boundary to include more lands outside of the Noise Contour in the southeast portion of the Subject Site would allow for a comprehensive planning framework to unlock the potential for mixed use development consistent with the employment area conversion request, and provide for the integrated planning of a transportation and mobility network, and servicing requirements.

In its discussions with City Planning staff, Woodbine has committed themselves to work with the City to develop a comprehensive planning framework for the Subject Site, including the MTSA. In line with the employment area conversion request, this request to consider an expanded MTSA boundary will assist in establishing a consistent Official Plan policy framework to allow for the comprehensive development of the Subject Site for a mixed use, transit-oriented complete community.

Our client is committed to continuing our ongoing dialogue with City Planning staff, and we are requesting that Planning and Housing Committee direct City Planning staff to expand the geographic limit of the Woodbine GO Station MTSA, as currently identified in draft SASP 758, so that it accords with the plans and studies that our client submitted with its employment area conversion request. We further request that this boundary adjustment be made in advance of the community consultation process to ensure that input is provided within a consistent framework.

It is clear that the early and timely delivery of this opportunity on the Woodbine lands is in the public interest. In that regard there should be alignment between the delineation of an MTSA and the employment area conversion request to provide the certainty of mixed use development for the Subject Site, which in turn will contribute to the delivery of private investment in public transit at no cost to the public.

We also request a meeting with Strategic Initiatives, Policy and Analysis staff to discuss this letter and next steps in the Woodbine GO Station MTSA delineation process. We trust that the information included in this submission letter will assist in City Planning's ongoing review. Should you have any questions or require additional information, please contact the undersigned.

Yours very truly,

WND associates
planning + urban design



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Senior Associate

cc. Joshua Wise and Philip Parker, Strategic Initiatives, Policy and Analysis
Jeffrey Cantos and Gerry Rogalski, Strategic Initiatives, Policy and Analysis (Official Plan)
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William Fleissig and Darren Morita, Woodbine Entertainment Group
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