



PLANNING AND URBAN DESIGN

29 June 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

RE: **Our Plan Toronto: Recommended Official Plan Amendment for City-wide Employment Policies and Conversion Requests**
Our Plan Toronto: City-wide 115 Proposed Major Transit Station Area/Protected Major Transit Station Area Delineations
Draft Official Plan Amendments 575 and 591
Agenda Items PH35.15 and PH35.16
555 Rexdale Boulevard
Woodbine Entertainment Group
City Conversion Request No. 074
WND File 16.562.07

Walker, Nott, Dragicevic Associates Limited (“WND Associates”) has been retained by Woodbine Entertainment Group (“Woodbine”) to assist in their request to redesignate the lands known municipally as 555 Rexdale Boulevard in the City of Toronto (the “Subject Site”) from *Core Employment Areas* and *General Employment Areas* to *Mixed Use Areas* and/or *Regeneration Areas*. The employment area conversion request was submitted by Davies Howe LLP and WND Associates 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) (the “Woodbine Conversion Request”). We have also been involved in the processing and approval of several development applications on the Subject Site.

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 reports *Our Plan Toronto: Recommended Official Plan Amendment for City-wide Employment Policies and Conversion Requests - Final Report* and *Our Plan Toronto: City-wide 115 Proposed Major Transit Station Area/Protected Major Transit Station Area Delineations - Final Report*, dated 20 June 2022, and their Attachments including Draft Official Plan Amendments (“OPAs”) 575 and 591.

We received confirmation, through correspondence with City Planning staff on 26 May 2022, that the Woodbine Conversion Request will not be considered by Planning and Housing Committee at its meeting on 5 July 2022, and further recommendation report(s) from City Planning staff are likely to be considered by Planning and Housing Committee and subsequently by City Council in early 2023 as a continuation of the MCR process.

We agree with the commentary in the City Planning staff report that “unique opportunities may arise where important city-building objectives may warrant a conversion to permit a broader mix of uses, including new residential uses, provided Official Plan objectives for change areas are addressed”. In our opinion, the Subject Site represents one of these unique city-building opportunities.

Through the MCR consultation process, we have provided comment letters both to City Planning staff (dated 4 March 2022 and 13 May 2022) and to Planning and Housing Committee (dated 24 March 2022) outlining Woodbine’s questions and concerns with the draft policies and MTSA delineation. We also participated in an MCR consultation meeting with City Planning staff on 7 April 2022 where we reiterated Woodbine’s request for coordination of the Woodbine Conversion Request and the MTSA delineation.

As outlined below, Woodbine requests that the delineation of the Woodbine GO Station Major Transit Station Area (“MTSA”) in OPA 575 is either deferred and considered concurrently with the Woodbine Conversion Request in 2023, or revised as per the delineation proposed in Attachments A and B to this letter.

Planning Policy Summary

Please refer to our previous comment letters, as well as section 3.0 of the Planning Rationale Report (prepared by WND Associates, dated July 2021) which accompanied the Woodbine Conversion Request, for an outline of the site-specific municipal planning policy framework applicable to the Subject Site. A summary is provided below.

Site and Area Specific Policy (“SASP”) 29 identifies specific areas within the Toronto Pearson International Airport Operating Area (“AOA”) that are located at the northwest and southeast quadrants of the Subject Site as having residential and non-employment land use permissions. SASP 296 further expands on the SASP 29 permissions by creating an overall planning framework for the Subject Site that includes a broad range of non-employment land use permissions. SASP 296 builds on the SASP 29 policies, and outlines the general location for residential uses and non-residential elements that envision an integrated entertainment development having a broad range of uses within the Subject Site, including permissions for non-employment uses across the site.

There are therefore long-standing and recognized permissions for residential and other non-employment uses that are critical to comprehensive planning and the integration of land uses within the Subject Site, including the existing horse racetrack which includes housing, dormitories and other noise sensitive land uses and the keeping of horses, as well as accessory uses, facilities and services.

The planning framework that is provided for in SASPs 29 and 296 contemplates an integrated planning approach for the Subject Site that would support the addition of a GO station in the southeast quadrant of the Subject Site, as is expressly anticipated in SASP 296.

Comments on Draft OPA 575 Woodbine GO Station MTSA Delineation (Proposed SASP 758)

Woodbine has been consistent in its various submissions to the City and the Province regarding the planning policy framework applicable to the Subject Site. Specifically 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 Woodbine Conversion Request, would result in transit-supportive density across the lands above the minimum targets set by A Place to Grow: Growth Plan for the Greater Golden Horseshoe (the “Growth Plan”). In our opinion, closer alignment of the MTSA delineation with the plans and studies supporting the Woodbine Conversion Request would represent good planning for the Subject Site and better facilitate comprehensive review of future development applications for the lands.

As indicated in our letter to Planning and Housing Committee on 24 March 2022, it is our understanding that the Treasury Board has approved an agreement in principle 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. 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. Given the clear public interest in the early and timely delivery of this opportunity which would provide important transit infrastructure to the Rexdale community, there should be alignment between the delineation of an MTSA and the Woodbine Conversion Request to provide the certainty of mixed use development for the Subject Site for the building of a complete community.

We agree with City Planning 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 Subject Site. 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 MTSAs served by the GO Transit rail network as found in Policy 2.2.4.3.c) of the Growth Plan. We further agree with the City Planning staff report that the proposed minimum density does not preclude future applications or studies from seeking greater density permissions, and 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. Given the size of the Subject Site the evolution of uses and densities, including significant employment, on the Subject Site is anticipated to be phased over a number of years.

As noted above, SASP 29 already recognizes specific areas of the AOA within the southeast quadrant of the Subject Site for residential use permissions. The proposed MTSA delineation does not accord with these existing permissions and in our opinion does not appropriately reflect an estimated 10-minute walking distance from the proposed Woodbine GO Station based on existing and planned/proposed streets and sidewalks. 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 Woodbine Conversion

Request, and provide for the integrated planning of a transportation and mobility network, and servicing requirements.

We are requesting that Planning and Housing Committee defer consideration of the delineation of the Woodbine GO Station MTSA to be concurrent with consideration of the Woodbine Conversion Request in 2023. Alternatively, we request that Proposed SASP 758 be revised as per Attachments A and B to this letter.

The attached revised MTSA delineation better aligns with both the existing planning policy framework on the Subject Site and the conceptual master plan for the Subject Site, which provides an integrated approach to the future development of a mix of uses in proximity to the Woodbine GO station. The revised delineation is also consistent with the definition of MTSA's in the Growth Plan, as it includes an "area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk". As demonstrated in Attachments A and B, the proposed MTSA boundary follows:

- Highway 27 to the east, a major street acting as a boundary for pedestrian movements;
- New Providence Trail to the north, an approved new public street forming the southern boundary of the approved Draft Plan of Subdivision in the northern portion of the Subject Site, and located approximately 800 metres to the north of the proposed GO station;
- The Woodbine Racetrack to the northwest;
- The Transport Canada approved 30 NEF/NEP Composite Noise Contour to the northwest, the limit of the area subject to residential land use permissions in SASP 29;
- A proposed north-south street, bounding proposed mixed use blocks and located approximately 800 metres to the west of the proposed GO station; and
- The Metrolinx rail corridor to the southwest.

Comments on Draft OPA 591 Draft Policy 4.6.7 and Sidebar Text

Any revisions to policies or the accompanying explanatory text in the Official Plan which restrict, limit or create planning policy uncertainty with respect to horse racing operations for Woodbine at the Subject Site or existing residential permissions would be of great concern to Woodbine, as previously noted in our comments to City Planning staff.

We received confirmation, through correspondence with City Planning staff on 14 June 2022, that a review of SASPs 29 and 296 will occur concurrently with consideration of the Woodbine Conversion Request in 2023. We also received confirmation that Draft Policy 4.6.7 is not intended to reflect any SASPs in Chapter 7 of the Official Plan, and that SASPs (including those applicable to the Subject Site) will continue to prevail as per Policy 5.6.7 and the introductory text of Chapter 7.

We agree with this and are committed to continuing our ongoing dialogue with City Planning staff with respect to the Woodbine Conversion Request.

Summary

We trust that the information included in this submission letter will assist the Planning and Housing Committee in its consideration of the City Planning staff reports and Draft OPAs 575 and 591. We request notice of the decision of the Committee on these matters. Our client is committed to continuing our ongoing dialogue with City Planning staff and requests further meetings with the Strategic Initiatives, Policy and Analysis Official Plan team to discuss this letter, the Woodbine Conversion Request, and next steps in the MCR process.

Should you have any questions or require additional information, please contact the undersigned.

Yours very truly,

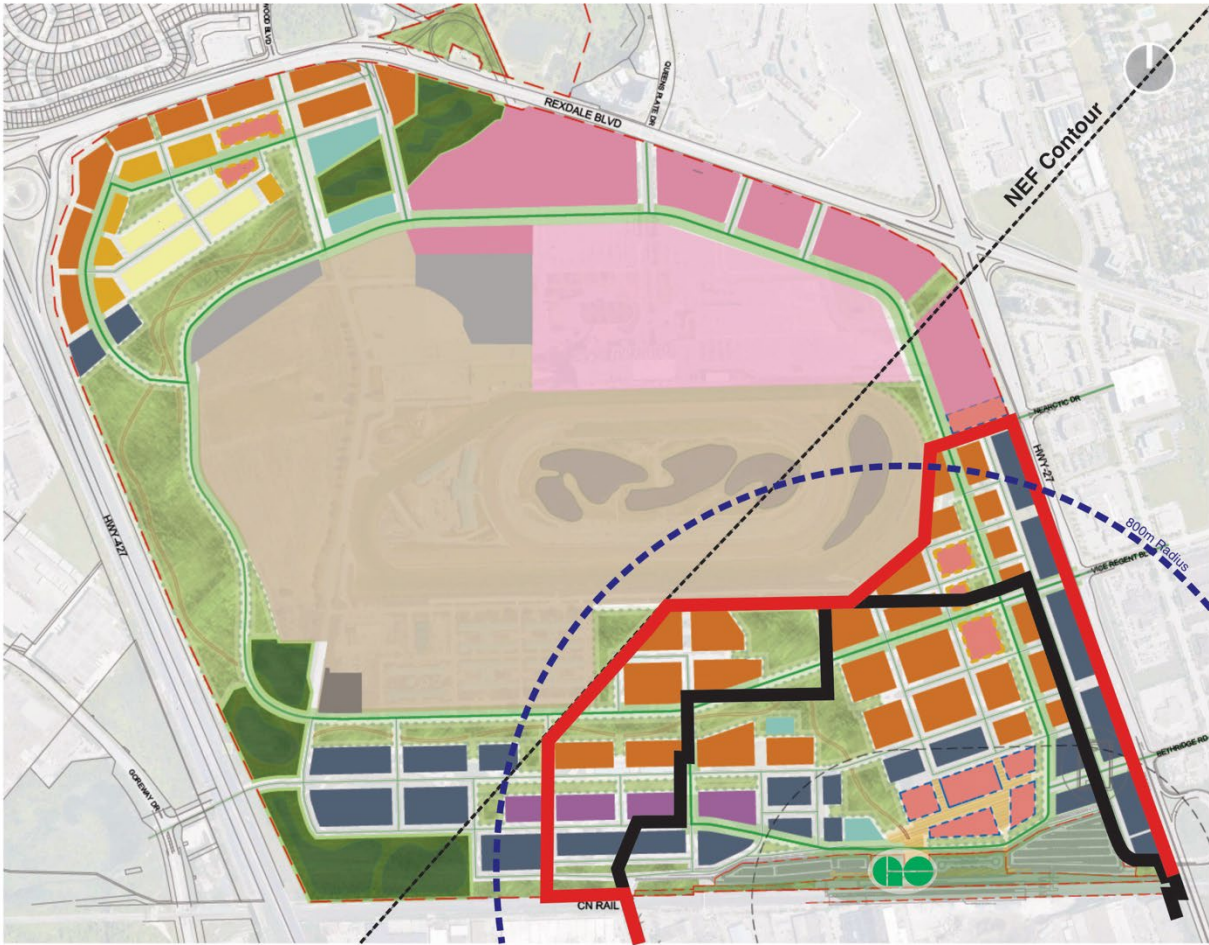
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Attachment A: Woodbine Community Plan and Proposed Major Transit Station Area Delineation



Legend

 Higher Density Residential	 Flexible Blocks (Residential/ Employment)	 Entertainment & Hospitality
 Medium Density Residential	 Residential Mixed Use	 Equine/Employment
 Stacked Townhouse	 Employment Mixed Use	 Parkland / Open Space
 Community	 Employment	 Storm Water Ponds
 MX-Station	 Mixed-Use/Retail	 Surface Parking
 Woodbine Proposed MTSA Delineation	 City Proposed MTSA Delineation	 800m Radius of the Woodbine GO Station

Attachment B: Proposed Revised Site and Area Specific Policy 758

Schedule “24” to Amendment 575

SASP 758. Major Transit Station Area – Woodbine GO Station

a) Major Transit Station Area Delineation

The area surrounding and including the planned Woodbine GO Station is a major transit station area shown as the Woodbine Major Transit Station Area on Map 1.

b) Residents and Jobs per Hectare

Existing and permitted development within the Major Transit Station Area – Woodbine GO Station is planned for a minimum population and employment target of 150 residents and jobs combined per hectare.

c) Authorized Uses of Land

The authorized uses of land are as identified by the land use designations on Map 13 and associated land use permissions in Chapter 4 of the Official Plan, applicable Secondary Plans and Site and Area Specific policies.

Map 1 – Woodbine GO Major Transit Station Area

