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PLANNING AND URBAN DESIGN

6 February 2024

Aird & Berlis LLP
Brookfield Place, 181 Bay Street, Suite 1800
Toronto ON M5J 2T9

Attention: Eileen P. K. Costello

Dear Ms. Costello,

RE: Planning Rationale Addendum
Employment Area Conversion Request
555 Rexdale Boulevard
Woodbine Entertainment Group
City of Toronto Official Plan Amendment 653
ERO Number 019-7731
WND File No.: 16.562.07

WND Associates has been retained by Woodbine Entertainment Group (“Woodbine”) as planning consultants with respect to their lands known municipally as 555 Rexdale Boulevard in the City of Toronto (the “Subject Site”).

This Planning Rationale Addendum has been prepared to assist the Minister of Municipal Affairs and Housing (the “Minister”) in respect of the Minister’s review of City of Toronto Official Plan Amendment (“OPA”) 653. This Planning Rationale Addendum is supplementary to the ***Planning Rationale Report prepared by WND Associates, dated July 2021*** (the “2021 Planning Rationale Report”) submitted to the City in support of the employment area conversion request submitted by Woodbine in 2021 as part of the City’s Municipal Comprehensive Review (“MCR”) process (the “Woodbine Conversion Request”, see below for further information).

Specifically, this addendum letter provides additional planning rationale to support Woodbine’s request for the Minister to modify OPA 653 as set out in the proposed Draft Site and Area Specific Policy (the “Woodbine SASP”) for the Subject Site (provided in **Appendix 1** to this letter) in order to enable the development of a transit-oriented and complete community in the southeast corner of the Subject Site in support of the planned Woodbine GO Station. The Woodbine SASP was previously provided to both the City and the Minister through correspondence submitted by Woodbine during the MCR process.

Description of Subject Site

The Subject Site is generally bounded by Rexdale Boulevard to the north, Highway 27 to the east, Highway 427 to the west and the Metrolinx rail corridor to the south, and is located in the Former City of Etobicoke. The Subject Site is a very large land holding in the City of Toronto with an area of approximately 277 hectares (or 684 acres) (see **Figure 1**).



Figure 1: Aerial Photograph of Subject Site

The current uses on the Subject Site include Woodbine horse racetrack complex and ancillary/associated uses, including gaming and off-track wagering facilities and various accessory buildings related to the racetrack operations. An integrated entertainment complex is currently being constructed and opened in phases in the northeast area of the Subject Site, which includes a casino, performance venue, two hotels, associated parking structures and retail/restaurant buildings.

Current Official Plan Designation and Applicable Policies

The City of Toronto Official Plan designates the Subject Site as *General Employment Areas* and *Core Employment Areas*.

The Subject Site is also subject to Site and Area Specific Policies (“SASP”) 29 and 296. As the preamble to Chapter 7 of the Official Plan indicates, SASPs provide policies that reflect unique historic conditions or provide a further layer of local policy direction for an area that can vary from one or more provisions of the parent Official Plan. SASP 29 generally addresses the requirements of the Toronto Pearson International Airport Operating Area (“AOA”) with respect to noise, while protecting existing land uses related to the Woodbine Racetrack and permitting residential land uses outside of the Transport Canada approved 30 NEF/NEP Composite Noise Contour.

SASP 296 provides an overall planning framework for the Subject Site that includes permissions for retail, office, residential and entertainment uses (see **Figure 2**).

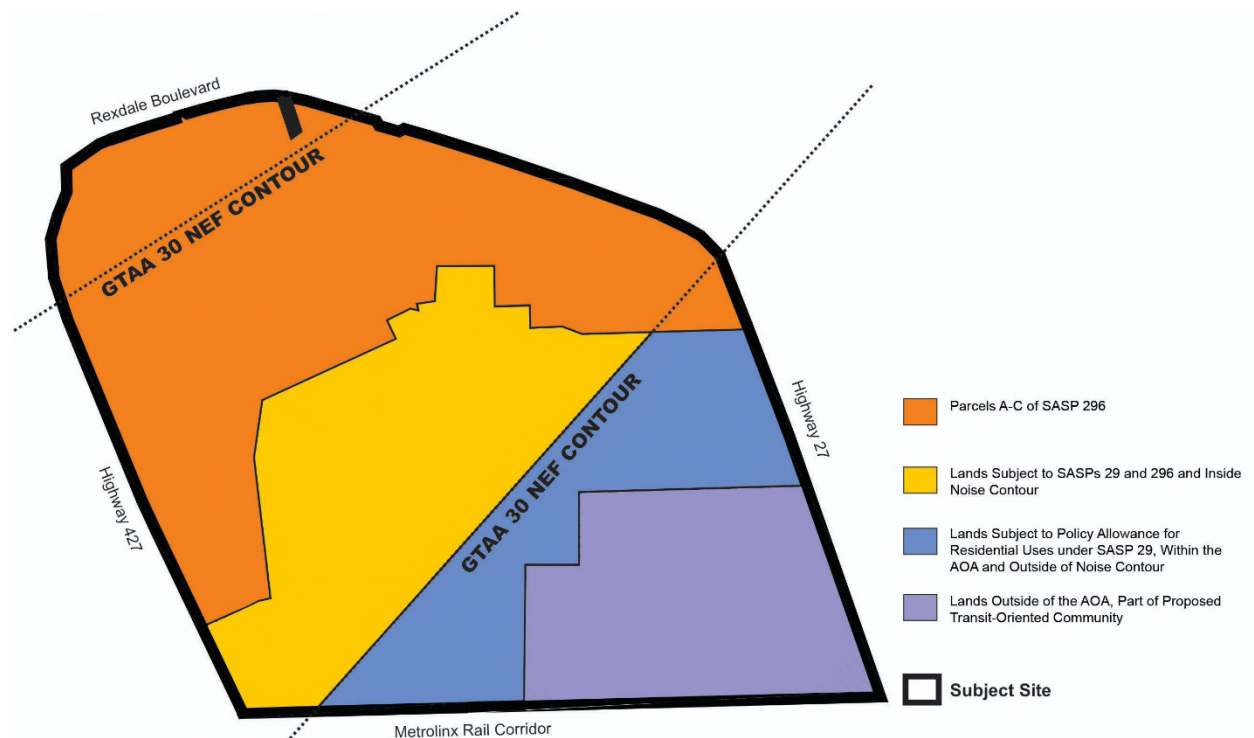


Figure 2: Subject Site Policy Overlay

Woodbine Conversion Request

On 30 July 2021, Davies Howe LLP and WND Associates submitted the Woodbine Conversion Request through the City-initiated MCR process. The Woodbine Conversion Request sought to redesignate the entirety of the Subject Site from *Core Employment Areas* and *General Employment Areas* to *Mixed Use Areas* and/or *Regeneration Areas*.

In support of the Woodbine Conversion Request, WND Associates prepared the 2021 Planning Rationale Report, which concluded that the request to convert the Subject Site from *General Employment Areas* and *Core Employment Areas* to *Mixed Use Areas* and/or *Regeneration Areas* represented good planning and achieved both Provincial and municipal policy objectives applicable to the Woodbine lands. As a result, the 2021 Planning Rationale Report recommended that the Subject Site should be considered for removal from the employment land inventory by City Planning staff and City Council as part of the City's MCR process.

The Woodbine Conversion Request was also accompanied by supporting reports which provided further information with respect to the Provincial and municipal conversion criteria, including a Land Use Compatibility/Mitigation Study, Mobility Assessment, Economic Analysis, Functional Servicing and Stormwater Management Report and Community Plan.

The Woodbine SASP for the Subject Site was prepared in support of the Woodbine Conversion Request, and is based on discussions with staff from both City Planning and Ministry of Municipal Affairs and Housing during the MCR process.

The proposed new Woodbine GO Station, which is being partially funded by Woodbine, is planned to be constructed in the southeast portion of the Subject Site along the Metrolinx rail corridor.

In order to support this public and private investment in higher order transit through the Woodbine GO Station, Woodbine prepared a Community Plan that demonstrates the comprehensive redevelopment of the Subject Site to include transit-support residential and employment densities. The Community Plan formed the basis the Woodbine Conversion Request, is supported by the 2021 Planning Rationale Report and the further reasons contained in this addendum letter, and is reflected in the Woodbine SASP that is recommended for inclusion in OPA 653.

Current Planning Matters on the Subject Site

On 15 December 2023, WND Associates on behalf of Woodbine submitted a Pre-Application Consultation (“PAC”) Meeting Request to the City of Toronto for a Draft Plan of Subdivision. The purpose of Woodbine’s proposed new Draft Plan application (see **Figure 3**) is to update and revise the existing approved Draft Plan for the RVC area to reflect the Community Plan, and to reflect the current and more detailed design of the RVC. The PAC Meeting occurred on 6 February 2024.

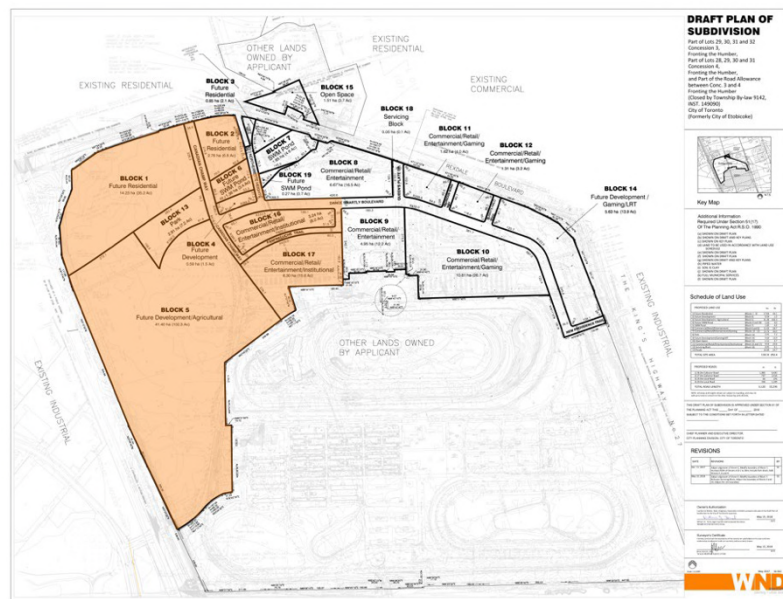


Figure 3: Area of Approved Draft Plan of Subdivision Proposed to be Revised

On 14 March 2023, Woodbine received a Statement of Approval for the site plan application for the portion of the Subject Site known as Block 8 (formerly Block 9 of the approved Draft Plan), for the development of multiple retail buildings (Buildings A, B, C1/2 and D), associated vehicular on-site parking, and a redesigned walking ring. Woodbine is currently engaging in ongoing discussions regarding a revised and improved concept for the design and layout of the walking ring and Building C1/2.

Major Transit Station Area Delineation (City of Toronto Official Plan Amendment 575) Comments

As noted above, the Woodbine GO Station and the area surrounding it have been identified by the City as a delineated MTSA in OPA 575. On 19 January 2023 and 9 May 2023, Woodbine made submissions through the Environmental Registry of Ontario (“ERO”) regarding consultation number 019-5934 with respect to OPA 575.

Through those previous earlier submissions, Woodbine requested that the lands delineated as part of the Woodbine GO Station MTSA be modified to increase the area and provide more defined boundaries that better align with the existing planning policy framework and the Community Plan for the Subject Site. This addendum letter is also supplementary to, and provides further support for, those earlier submissions made on behalf of Woodbine to the Ministry of Municipal Affairs and Housing (“MMAH”) regarding OPA 575.

The requested updated delineation proposed by Woodbine in its submissions to the Minister on OPA 575 is consistent with the definition of MTSA in the Growth Plan and further addresses Growth Plan Policy 2.2.4.2 which states that municipalities “will delineate the boundaries of major transit station areas in a transit-supportive manner that maximizes the size of the area and the number of potential transit users that are within walking distance of the station” (emphasis added).

The proposed updated MTSA delineation is supportable as the delineation maximizes the available area in proximity to the future Woodbine GO Station given the location of the existing Woodbine racetrack (which is to be supported and maintained, and not available for residential or mixed use development), and the delineation utilizes accepted and defined boundaries including the Transport Canada approved 30 NEF/NEP Composite Noise Contour, public streets and the Metrolinx rail corridor.

City of Toronto Official Plan Amendment 653

As part of the City-initiated MCR process, OPA 653 was adopted by City Council on 6 September 2023 (through By-law 822-2023) and is now before the Minister of Municipal Affairs and Housing for a decision under the *Planning Act*. OPA 653 implements the adoption of select conversion requests to convert specific lands from an *Employment Areas* designation to non-employment uses or to broaden permitted uses.

The Woodbine Conversion Request was considered and partially adopted through OPA 653. With respect to the Subject Site, OPA 653 converted only the northwest portion from *General Employment Areas* to *Mixed Use Areas*. This northwest portion of the Subject Site already held residential permissions through SASPs 29 and 296 and the area is outside of the Transport Canada approved 30 NEF/NEP Composite Noise Contour.

OPA 653 makes the following amendments to permit this partial conversion:

- Map 2: Urban Structure is amended to remove the northwest portion of the Subject Site from *Employment Areas*;
- Map 13: Land Use is amended to redesignate the northwest portion of the Subject Site from *General Employment Areas* to *Mixed Use Areas* (see **Figure 4**);
- SASP 296 is amended to replace Map 1 with a new map identifying Parcel C as the lands in the northwest portion, and Parcels A and B to reflect boundaries of an approved Draft Plan of Subdivision for the Subject Site (see **Figure 5**).

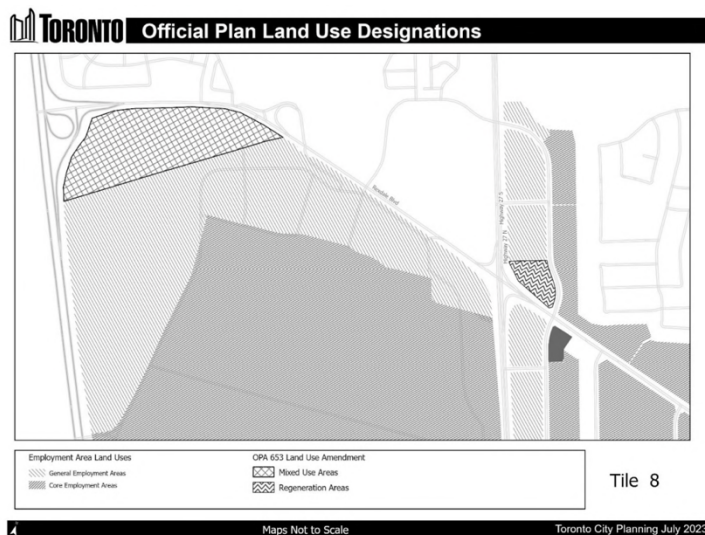


Figure 4: OPA 653 (By-law 822-2023) Land Use Amendment

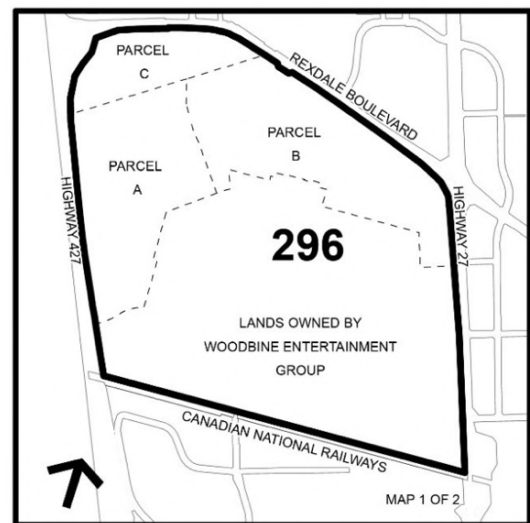


Figure 5: OPA 653 (By-law 822-2023) Amended Map 1 of 2 in Site and Area Specific Policy 296

However, OPA 653 does not redesignate any of the remaining lands on the Subject Site or provide any further site-specific policy for the development of the Woodbine site through a SASP.

From a planning perspective, the City's decision to approve only a limited conversion of lands in the northwest part of the Subject Site (which already had residential permissions) does not facilitate transit-supportive residential permissions to support the new Woodbine GO Station. The proposed modification to OPA 653 to redesignate the southeast area of the Subject Site to *Mixed Use Areas* and the accompanying Woodbine SASP recommended in this submission (and explained in more detail below) will provide an appropriate planning outcome by approving the conversion of a greater area of the Subject Site around the future Woodbine GO Station, in order to facilitate the development of a transit-oriented and complete community in support of the planned public transit infrastructure.

The submission of the PAC Meeting Request and ongoing consultation with City Planning staff demonstrates Woodbine's commitment to coordinating with the City to implement housing opportunities on the Subject Site in line with both existing policy permissions and City Council direction through OPA 653. However, as noted in the 2021 Planning Rationale Report and discussed further below, redesignation of only the RVC lands does not implement the mixed use residential permissions in the southeast portion

of the Subject Site through SASP 29 or unlock housing opportunities for the MTSA in support of a transit-oriented and complete community adjacent to the Woodbine GO Station.

Proposed Modification to Official Plan Amendment 653

Woodbine is requesting the Minister modify OPA 653 to redesignate the southeast area of the Subject Site to *Mixed Use Areas* and include the Woodbine SASP, which provides a framework for the development of those lands.

Woodbine has been consistent in its request to the Minister regarding the need to convert the lands surrounding the future Woodbine GO Station in order to ensure the delivery of transit-supportive development in close proximity to the new transit station. On 9 May 2023, Aird & Berlis LLP on behalf of Woodbine submitted comments to MMAH with respect to OPA 591, which was adopted by City Council at an earlier stage of the MCR process that addressed a first tranche of the employment area conversion requests submitted to the City. The Aird & Berlis letter was also accompanied by the 2021 Planning Rationale Report. OPA 591 was subsequently approved by the Minister without modifications on 12 December 2023.

In their 9 May 2023 correspondence to the Minister, Woodbine scoped their conversion request to the portion of the Woodbine Lands located within the proposed modified MTSA boundary (as requested in Woodbine's ERO submission regarding OPA 575 noted above), and to redesignate those lands to *Mixed Use Areas* to facilitate the early delivery of the transit-oriented and complete community for the area, consistent with the Provincial vision and with Woodbine's Community Plan. As part of that submission, Woodbine provided a Draft SASP which was developed to be consistent with the current planning policy framework for the Subject Site and with the Province and City's priorities for employment area conversions and complete communities.

Following the adoption of OPA 653 by City Council, the Woodbine SASP has been updated to reflect the Council-adopted conversion of the northwest portion of the Subject Site and reiterate the proposal to redesignate the southeast MTSA lands to *Mixed Use Areas*, and to implement a land use planning framework for the orderly and timely development of those lands.

The Woodbine SASP is provided **Appendix 1** to this letter. An overview of the planning policy framework, a planning analysis as it applies to the Woodbine Conversion Request, and a planning rationale supporting the structure and policies of the proposed Woodbine SASP is provided below.

Planning Policy Framework

The planning rationale in support of Woodbine's requested modifications to OPA 653 and the Woodbine SASP are in addition to the thorough planning analysis already provided to the Minister in the 2021 Planning Rationale Report, which was included as part of Woodbine's 9 May 2023 submission on OPA 591.

As outlined in the 2021 Planning Rationale Report, under SASPs 29 and 296 in the City of Toronto Official Plan, significant portions of the Subject Site already have residential and/or mixed use policy permissions, which are otherwise not permitted under the *General Employment Areas* and *Core Employment Areas* designations. Accordingly, these designations do not reflect or align with the existing policy framework for the Subject Site. While the Woodbine Conversion Request seeks to redesignate portions of the Subject

Site, it is important to recognize that non-employment uses and uses not otherwise permitted under the employment land use designation are already permitted.

The 2021 Planning Rationale Report also provided an overview of the Provincial and municipal planning policy framework applicable to the Subject Site, and how the Woodbine Conversion Request addressed general policies. The report also provided a detailed analysis of employment area conversion criteria found in Provincial and municipal policy documents.

The Woodbine Conversion Request, as proposed to be implemented through the updated Woodbine SASP, will establish a consistent Official Plan policy framework to allow for the comprehensive development of appropriate portions of the Subject Site outside of the applicable noise contour for a mixed use, transit-oriented complete community.

The sections of this addendum letter below provide updated planning policy analysis which further support the conclusions of the 2021 Planning Rationale Report. For additional details, we please refer to the 2021 Planning Rationale Report.

Planning Act

The conclusion of the 2021 Planning Rationale Report that the Woodbine Conversion Request has regard to matters of provincial interest under the *Planning Act* remains valid.

The proposed Woodbine SASP provides additional detailed policy with respect to matters in s.2 including:

- (h) the orderly development of safe and healthy communities;
- (j) the adequate provision of a full range of housing, including affordable housing;
- (k) the adequate provision of employment opportunities;
- (m) the co-ordination of planning activities of public bodies;
- (p) the appropriate location of growth and development; and
- (q) (r) the promotion of development that supports public transit and built form that is well-designed.

Provincial Policy Statement

As per the 2021 Planning Rationale Report, the Woodbine Conversion Request addresses the relevant policies of the Provincial Policy Statement, 2020 (the “PPS”) with respect to:

- the utilization of land within a settlement area (1.1.3.1);
- the provision of increased mixed use densities and a significant supply and range of housing options (1.1.3.2 and 1.1.3.3.);
- the preparation of appropriate development standards for the Community Plan area and MTSA to facilitate intensification, redevelopment and compact form in proximity to new transit infrastructure, while mitigating public health and safety risks through development design to ensure compatibility with nearby employment areas and the creation of a pattern of healthy streets for both resident and non-resident users (1.1.3.4); and
- the accommodation of an appropriate mix and range of employment, institutional and broader mixed uses to meet long-term needs, the promotion of the conditions for economic investment, and the development of necessary infrastructure to support current and projected needs through future development applications and processes (1.3.1).

This conclusion also remains valid for the proposed Woodbine SASP, which provides additional detailed policy with respect to the matters noted above, including a development framework for the Subject Site, land use policies, employment and housing targets and implementation requirements (see below).

Proposed Provincial Planning Statement

On 6 April 2023, the Ministry of Municipal Affairs and Housing released the Proposed Provincial Planning Statement, 2023 (the “Proposed PPS”). As currently drafted, the Proposed PPS would replace the existing PPS and A Place to Grow: Growth Plan for the Greater Golden Horseshoe.

While the current draft of the Proposed PPS may change prior to its final approval and coming into force and effect, its policies are generally similar to the PPS with respect to how planning is directed for the achievement of complete communities. Notably the Proposed PPS continues to support the efficient use of land, resources, and infrastructure; continues to promote economic development; supports an appropriate mix and range of employment uses; promotes the creation of diversified economic base; and continues to support land use coordination between proponents, approval authorities and other stakeholders to achieve complete communities supported by a range of services and facilities.

The Proposed PPS includes policy for the removal of lands from employment areas with reduced/modified criteria that have been addressed by the Woodbine Conversion Request, and does not carry forward any requirement for conversion through an MCR process. The Proposed PPS also repeals Provincially Significant Employment Zones. With respect to employment areas, the Proposed PPS also directs that planning authorities shall assess and update employment areas identified in official plans to ensure that this designation is appropriate to the planned function of employment areas.

The Woodbine Conversion Request and the proposed Woodbine SASP have adequate regard to the current draft of the Proposed PPS, notwithstanding that it is not currently in force and effect.

A Place to Grow: Growth Plan for the Greater Golden Horseshoe

As per the 2021 Planning Rationale Report, the Woodbine Conversion Request addresses the relevant policies of A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 as amended in 2020, (the “Growth Plan”) with respect to:

- contributing to the evolving regional economy and the function of the City as an economic powerhouse and principal international gateway (1.2);
- addressing the Growth Plan’s guiding principles of achieving complete communities and prioritizing intensification and higher densities in strategic major transit station areas, among other principles (1.2.1);
- optimizing the use of existing urban land and supporting the Growth Plan’s intensification first and complete communities approach to development and city-building (2.1);
- the development of the Subject Site for a diverse mix of land uses, including residential and employment uses (including the Woodbine Racetrack and casino), and convenient access to local stores, services, and public service facilities (2.2.1.4);
- the location of the Subject Site on a priority transit corridor, where planning is to be prioritized for MTSAs (2.2.4.1);
- contributing to meeting and exceeding the minimum density target of 150 residents and jobs combined per hectare for areas served by the GO Transit rail network (2.2.4.3);

- the provision of multimodal access to future higher order transit station(s), and connections to the major trip generators/destinations of the Woodbine Racetrack and casino (2.2.4.8);
- collaboration between public and private sectors, through the joint development project of the Woodbine GO Station (2.2.4.9); and
- maintaining and establishing the foundation for significant new employment to promote economic development and competitiveness (2.2.5.1).

This conclusion also remains valid for the proposed Woodbine SASP, which will make more efficient use of existing employment areas and vacant/underutilized employment lands, increase employment densities, connect areas of employment to transit, integrate land use planning and economic development goals for northwest Toronto, and provide significant residential and non-residential development in an MTSA.

Approval of the Woodbine Conversion Request and the proposed Woodbine SASP by the Minister and the subsequent removal of the Subject Site's Provincially Significant Employment Zone ("PSEZ") identification by the Province would recognize the long-standing site-specific planning policy framework in effect for the Subject Site to provide for residential and non-employment development, as described above and in detail in the 2021 Planning Rationale Report. The removal of the PSEZ is contemplated by the Proposed PPS and is also required to facilitate the development of a complete community in proximity to investment in public transit, in order to advance Provincial goals for housing in the MTSA on the Subject Site.

City of Toronto Official Plan

As per the 2021 Planning Rationale Report, the Woodbine Conversion Request addresses the relevant policies of the City of Toronto Official Plan with respect to:

- focusing urban growth at mobility hubs and corridors connected by the regional transportation system and expanding components of the City and Metrolinx's transit infrastructure (2.1.1);
- providing for new development on the Subject Site adjacent to transportation corridors and facilities which will be designed to be compatible with, and supportive of, the long-term purposes of the corridor (2.2.4);
- contributing to reducing auto dependency and addressing the broader social and environmental objectives of the Official Plan's reurbanization strategy (2.4.4);
- continuing to provide for a variety of non-residential and employment uses on the Subject Site to augment the cluster of business and economic activity associated with Woodbine, contributing to the City's economic health policies by unharnessing opportunities for a broad range of stable full-time employment, maintaining a healthy tax base for the City, and attracting new and expanding employment clusters to a site with strategic transit connections (3.5.1.1); and
- implementing development through Zoning By-law Amendment(s), Draft Plan(s) of Subdivision, Site Plan Control, urban design guidelines and other mechanisms (such as development and community benefits charges) in collaboration with the City (5.1).

This conclusion also remains valid for the proposed Woodbine SASP, which provides additional detailed policy with respect to the matters noted above and the application of the Official Plan's policies for new neighbourhoods (see below).

Employment Area Conversion Criteria

Employment area conversion requests are required to address the criteria as stated in PPS Policies 1.3.2.4 and 1.3.2.5, Growth Plan Policy 2.2.5.9 and Official Plan Policies 2.2.4.14 to 2.2.4.18 (in addition to the other policies of the PPS, Growth Plan and Official Plan).

For the reasons outlined in the 2021 Planning Rationale Report, the Woodbine Conversion Request adequately addresses these conversion criteria to the extent they can be feasibly demonstrated by the conceptual master plan and supporting reports. The employment area conversion request is appropriate taking into consideration the existing planning policy framework, the planned investment in public transit infrastructure on the Subject Site through the development of the Woodbine GO Station and the delineation of portions of the Subject Site as an MTSA.

As a summary of the conclusions with respect to employment area conversion criteria:

- There is a demonstrated multi-faceted need for the conversion, the lands are not required for the restricted employment purposes for which they are designated, the City will maintain sufficient employment lands to accommodate forecasted employment growth, the proposed uses would not adversely affect the overall viability of the employment area and will contribute to the achievement of minimum intensification and density targets, as well as other planning policies with respect to complete communities, economic competitiveness and other matters.
- Through future development applications to implement the development of the Subject Site for mixed use development, the build out of the Community Plan will plan for and provide the necessary infrastructure and public services and facilities to accommodate the proposed uses.

The proposed Woodbine SASP provides a further and appropriate level of policy detail for future development of the MTSA, as demonstrated in the rationale section of this addendum letter below, which also appropriately addresses the employment area conversion criteria.

Land Use Compatibility/Mitigation Study Peer Review

As part of the City's review of the Woodbine Conversion Request through the MCR process, a peer review of the submitted Land Use Compatibility/Mitigation Study was conducted on behalf of the City. Woodbine received a Peer Review report prepared by Arcadis Canada Inc., dated 6 May 2022.

The peer reviewer of the Land Use Compatibility/Mitigation Study concluded that the submitted study was prepared according to the available guidelines. The only updates requested through the peer review process were requirements to confirm the use of the best industry practices with respect to analysis and recommendation of mitigation measures. In discussions with City Planning staff, Woodbine agreed that the conclusions of the assessment remain unchanged and that Arcadis's comments will be addressed in future assessments of development applications for the Subject Site as the detailed design advances. Furthermore, Woodbine's land use compatibility and mitigation consultants concluded that they were satisfied that the concerns raised can be appropriately addressed, as outlined in a peer review comment response letter from RWDI, dated 10 June 2022, and provided to City Planning staff.

Planning Analysis

As noted above, Woodbine has updated the proposed Woodbine SASP to reflect the Council-adopted conversion of the northwest portion of the Subject Site and reiterate the proposal to redesignate the southeast MTSA lands to *Mixed Use Areas* and to implement a land use planning framework for the orderly and timely development of those lands (see **Figure 6**).

The Woodbine SASP is provided as **Appendix 1** to this letter.

In addition to the lands in the northwest portion of the Subject Site outside of the 30 NEF/NEP Composite Noise Contour as per the Council-adopted OPA 653, the scope of the requested redesignation to *Mixed Use Areas* includes the lands in the southeast portion of the Subject Site within the proposed revised MTSA boundary as per Woodbine's comments on OPA 575.

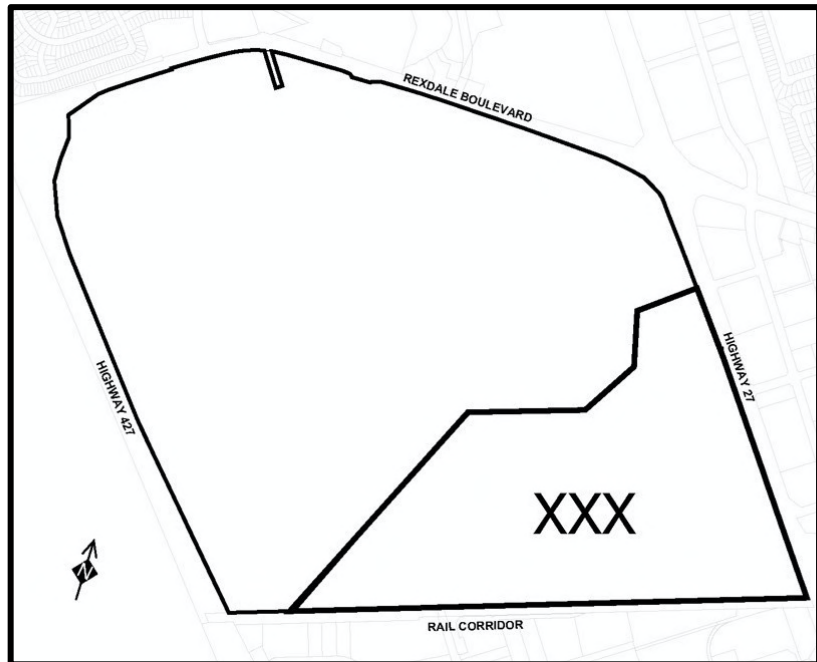


Figure 6: Proposed Site and Area Specific Policy map

It is proposed that the northwest portion of the Subject Site remain subject to SASP 296. This is appropriate because this is the long-standing policy applicable to those lands, and Woodbine has already engaged with the City on a number of previous and current development applications under this framework, including pre-application consultation for a revised Draft Plan of Subdivision as noted above.

As per Council-adopted OPA 653, Map 1 of SASP 296 has been updated to reconcile the boundary of Parcel C with the 30 NEF/NEP Composite Noise Contour and the redesignation to *Mixed Use Areas*. Consistent with this mapping update, Map 2 of SASP 296 is also proposed to be updated through the Woodbine SASP to reflect the public street network of the approved and partially registered Plan of Subdivision.

Consistent with the comments provided to MMAH with respect to OPA 591, the proposed Woodbine SASP includes a site-specific planning policy framework which would be applicable to the lands within the proposed MTSA boundary, and which would be discrete to the MTSA to reflect the context of that portion of the Subject Site.

The proposed Woodbine SASP is consistent with, and complementary to, SASP 296 (and SASP 29 as relevant). Therefore, the implementation of these SASPs for the Subject Site is appropriate to guide the comprehensive development of the Subject Site.

The scoped redesignation to be implemented through the proposed Woodbine SASP is appropriate at this stage through the MCR process, in order to assist in accelerating the development of the Subject Site for

a comprehensive mixed use development with residential and employment densities that will support the investment in transit and the delivery of the Woodbine GO Station. Given the existing flexible non-residential planning policy applicable to the remainder of the lands under Woodbine's ownership, and emerging Provincial policy direction regarding the appropriate use of employment lands in proximity to higher order transit and mixed use areas, it is anticipated that future development applications will be submitted to further refine the planning framework for the lands within the 30 NEF/NEP Composite Noise Contour. The proposed Woodbine SASP does not preclude the continued comprehensive planning for the Subject Site.

The proposed Woodbine SASP has been prepared to be consistent with the current planning policy framework for the Subject Site and with the Province and City's priorities for employment area conversions and complete communities, as demonstrated in multiple Council-adopted SASPs (through OPAs 591, 644 and 653) in response to conversion requests.

The sections of this addendum letter below provide further rationale for the components of the planning policy framework in the proposed Woodbine SASP, which are applicable to the proposed MTSA. The policy references below refer to the proposed policy sections in the Woodbine SASP is provided as **Appendix 1** to this letter.

Development Framework

The proposed development framework through Proposed Policy a) i) builds on, is consistent with, and updates the existing policy applicable to Subject Site through SASPs 29 and 296. In accordance with the City's direction on approved conversion requests, the development framework policies provide for the development of a mixed use and mixed income transit-oriented development in proximity to planned and funded higher order transit.

Sustaining and building on the existing horse racetrack and its associated entertainment uses is a key element of SASP 296 and in the Provincial interest, and is therefore reiterated in the proposed Woodbine SASP, with the Subject Site to be organized around residential neighbourhoods and non-residential districts.

The organization of the Subject Site into districts associated with public and private open spaces and streets is included in Proposed Policy a) ii), and is to be implemented through future development applications. This is also consistent with SASP 296 and in accordance with both Provincial and municipal planning policies with respect to the development of complete communities.

The minimum density target of 150 residents and jobs combined per hectare in Proposed Policy a) iii) is also consistent with Growth Plan Policy 2.2.4.3.c) for MTSA's served by the GO Transit rail network. The inclusion of this policy is also consistent with the City's approach to minimum density targets in SASPs for delineated MTSA's.

Proposed Policy a) iv) with respect to the phasing of infrastructure to support servicing and transportation connections on the lands allows for flexibility to respond to market and other future conditions. This policy also provides for the orderly development of the lands by ensuring servicing and transportation connections are adequately considered through the processing of future development applications.

Land Use

The proposed redesignation of the MTSA to *Mixed Use Areas* will permit a broad range of commercial, residential and institutional uses, in single use or mixed use buildings, as well as parks and open spaces and utilities, as per Policy 4.5.1 of the Official Plan. The proposed Woodbine SASP includes further site-specific policy regarding permitted land uses, in order to reflect the unique context of the Subject Site, both in respect of the existing uses on the lands as well as the surrounding employment areas to the east and south.

In accordance with SASP 29 and in line with the discussion noted above regarding support for the existing Woodbine operations, Proposed Policy b) i) confirms that the lands may be used for the ongoing use as a horse racetrack and accessory use including housing, dormitories and other noise sensitive land uses and the keeping of horses. This policy is appropriate to provide flexibility for the use of lands adjacent to the racetrack for Woodbine operations (which includes employment) as demonstrated in the Community Plan.

Proposed Policy b) ii) provides that uses permitted in *Core Employment Areas* and *General Employment Areas* which are compatible with residential uses in the MTSA are permitted. Examples of these uses which are appropriate for the Subject Site, and which are contemplated in emerging Provincial policy, include light industrial/manufacturing, warehousing, wholesaling, distribution, storage, and research and development facilities, among others. The compatibility of these proposed uses with residential uses is to be demonstrated through the development application process as required, including the preparation of Compatibility/Mitigation Studies in accordance with the City's terms of reference where necessary. This site-specific land use policy provides for an appropriate mix of uses, particularly adjacent to the Metrolinx rail corridor as a transition to existing and future employment uses, and to provide flexibility for achieving employment density in the MTSA.

Further to the above, Proposed Policy b) iii) reiterates that sensitive land uses, including residential uses, which are permitted on the Subject Site in proximity to existing and future employment uses, are to be planned in accordance with Official Plan Policies 2.2.4.5 to 2.2.4.10 regarding compatibility/mitigation. Development within 30 metres of the Metrolinx rail corridor will also be required to demonstrate compliance with rail safety and mitigation standards. This proposed policy is consistent with the City of Toronto Official Plan, and is appropriate.

With respect to the orderly development of the MTSA concurrent with, and in support of, the future Woodbine GO Station, Proposed Policy b) iv) builds on SASP 296 by confirming that development will not preclude the necessary infrastructure elements for the station. Further to this, Proposed Policy b) v) provides that residential occupancy is tied to agreements to fund the GO Station. It is our understanding that this policy is consistent with the City's approach to other new GO stations, and is appropriate to ensure the delivery of a transit-oriented and complete community.

In order to ensure appropriate transition and flexibility through phased development, Proposed Policy b) vi) provides that uses permitted under the existing applicable zoning by-law (which permits a range of non-residential uses) continue to be permitted until such time as Zoning By-law Amendment(s) are enacted.

Non-Residential Development

The concurrent development of non-residential development with residential development is key to the City's approach to complete communities, particularly with respect to employment area conversion requests. In accordance with this approach and to provide balanced development, Proposed Policy c) i) provides direction that non-residential gross floor area be developed prior to or concurrent with residential development in each phase of development.

Proposed Policy c) ii) is also consistent with the City's direction in comparable SASPs resulting from employment area conversions, by providing policy directing non-residential uses in stand-alone buildings or contiguous portions of a base building to encourage a clustering of business and economic activities.

Given the site-specific context and the anticipated quantum of non-residential development on lands in proximity to the MTSA in other areas of the Subject Site, this proposed policy also provides flexibility to develop non-residential uses across the Woodbine lands to satisfy the requirements for balanced development.

Housing

Proposed Policy d) i) sets out the approach to housing in the MTSA, stating that the lands will contain a mix of housing that contributes to the full range of housing in terms of type, tenure and affordability, and that given the amount of land to be developed for new housing on the lands, the Subject Site offers an opportunity for the significant achievement of affordable housing, attainable housing and rental housing. This high level approach is consistent with the Provincial policy direction for housing as noted above, and with the City's approach in comparable SASPs resulting from employment area conversions.

The specifics of the provision of attainable and affordable housing are outlined in Proposed Policy d) ii) and are to be secured through agreements with the City in accordance with Proposed Policy d) iii). The proposed provision is a minimum of 5% of the total new residential gross floor area on the entirety of the lands at full build-out as affordable or attainable ownership or rental housing, and where both affordable and attainable housing is provided, a minimum of 30% will be affordable housing. The proposed affordable rental housing is to be provided for a period of no less than 25 years from the time that each unit is first rented. These parameters are generally consistent with the Province's proposed amendments to O. Reg 232/18 and emerging policy. The proposed rent for affordable rental housing units is also consistent with the definition of "affordable residential unit, rented" as per Section 4.1(2) of the *Development Charges Act*.

This proposed policy framework allows for flexibility in the provision of affordable and attainable housing under the current direction from the Province.

Given the scale and anticipated phasing of future development in the MTSA, Proposed Policy d) iv) provides appropriate policy direction that opportunities to increase the provision of affordable or attainable housing beyond the proportions required by Proposed Policy d) ii) shall be explored in partnership with all levels of government and/or non-profit housing providers. This policy provides for flexibility in the provision of housing in cooperation with any housing accelerator tools available at the time of the development of residential phases.

Proposed Policy d) v) secures the provision of family-sized units (15% two- or three-bedroom units and 10% three-bedroom units), in a manner consistent with the City's Growing Up Guidelines: Planning for Children in New Vertical Communities, which has been implemented in Secondary Plan and SASP policies across the City.

Implementation

Proposed Policy e) i) sets out the requirements for complete applications for Zoning By-law Amendment and/or Draft Plan of Subdivision to implement the planning framework for the Subject Site. This policy is consistent with the approach to development in SASP 296, and is also comprehensive in its inclusion of requirement to address street patterns, infrastructure, the mix and location of land use, and strategies for parkland, community services and facilities, housing, sustainability, stormwater management, and waste management.

The proposed implementation policies are also consistent with Policy 3.3.1 of the City of Toronto Official Plan with respect to the development of new neighbourhoods. The implementation of the Woodbine SASP through complete applications for Zoning By-law Amendment and/or Draft Plan of Subdivision (and subsequently Site Plan Control as appropriate), under the policy framework as described above, will provide for the timely and orderly development of the MTSA.

Conclusion

For the reasons outlined above, Woodbine requests the Minister exercise the authority to modify OPA 653 as set out in the proposed Woodbine SASP, included as **Appendix 1** to this letter.

The Woodbine Conversion Request, as proposed through the Woodbine SASP, seeks the conversion of the southeast portions of the Subject Site from *General Employment Areas* and *Core Employment Areas*, respectively, to *Mixed Use Areas*.

In support of this request, this addendum letter confirms and updates the 2021 Planning Rationale Report which demonstrated the potential comprehensive development of the Subject Site for a mixed use, complete community.

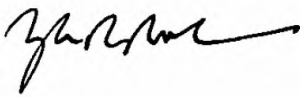
As a summary, the Woodbine Conversion Request and proposed Woodbine SASP have regard to matters of provincial interest under the *Planning Act*, and adequately address the general policies and employment area conversion criteria of the PPS, Growth Plan and City of Toronto Official Plan.

The proposed Woodbine SASP has been prepared to be consistent with the current planning policy framework applicable to the Subject Site, Provincial policy with respect to housing and employment, the City's approach to site-specific policies for complete communities with respect to conversion requests, and Official Plan policies with respect to land use compatibility and mitigation.

The proposed Woodbine SASP has merit, represents good planning, and portions of the Subject Site should be considered for removal from the employment land inventory by the Minister as part of the approval of the City's Municipal Comprehensive Review of the Official Plan.

Yours very truly,

WND associates
planning + urban design

A handwritten signature in black ink, appearing to read 'Tyler Peck', is written over a light gray rectangular background.

Tyler Peck, MCIP, RPP
Senior Associate

APPENDIX 1
**Proposed Woodbine
Site and Area Specific Policy**

AMENDMENT XXX TO THE OFFICIAL PLAN

LANDS MUNICIPALLY KNOWN IN THE YEAR 2024 AS 555 REXDALE BOULEVARD

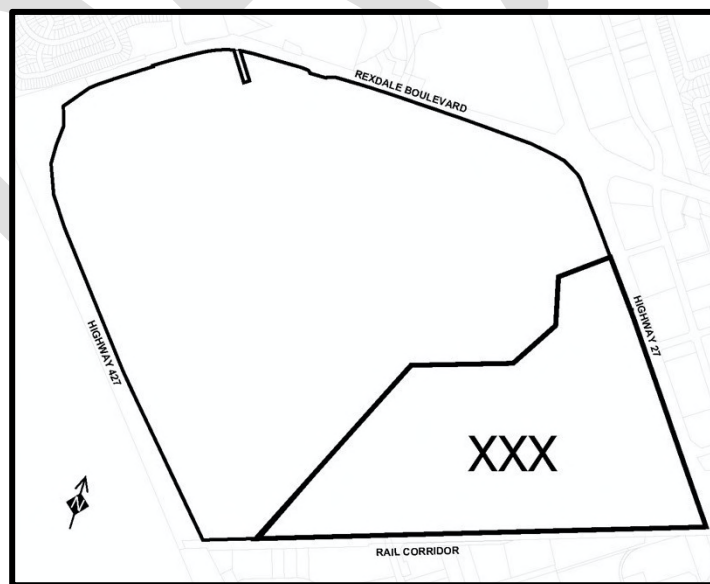
The Official Plan of the City of Toronto is amended as follows:

1. Map 2, Urban Structure, is amended by deleting portions of the lands known municipality in the year 2024 as 555 Rexdale Boulevard from the *Employment Areas* designation as shown in Appendix 1 to this Amendment.
2. Map 13, Land Use Plan, is amended by redesignating portions of the lands known municipality in the year 2024 as 555 Rexdale Boulevard as shown in Appendix 2 to this Amendment.

Municipal Address	Land Use Designation	OPA XXX Land Use Change
555 Rexdale Boulevard	General Employment Areas	Mixed Use Areas
555 Rexdale Boulevard	Core Employment Areas	Mixed Use Areas

3. Chapter 7, Site and Area Specific Policies, Site and Area Specific Policy 296 is amended by replacing Maps 1 and 2, as shown in Appendix 3 to this Amendment.
4. Chapter 7, Site and Area Specific Policies, is amended by adding the new Site and Area Specific Policy XXX and associated map for the lands known municipally in the year 2024 as 555 Rexdale Boulevard, as follows:

“XXX. 555 Rexdale Boulevard



a) Development Framework

- i) A mixed use and mixed income transit-oriented development is permitted to create a complete community. Development of the lands will sustain and build on the existing horse racetrack and associated entertainment uses to create residential neighbourhoods, commercial/retail and entertainment centres, and employment uses; for residents, workers and visitors in the Greater Toronto Area.
- ii) Existing and new development will be planned in districts for mixed use, residential, commercial/retail, entertainment and employment sub-areas which are organized around design features including amenities, public and private streets and lanes, and parks and open spaces.
- iii) Development will achieve a minimum population and employment target of 150 residents and jobs combined per hectare, to support higher order transit.
- iv) Development and its associated infrastructure may be phased and will be structured to support servicing and transportation connections on the lands and to surrounding streets and areas.

b) Land Use

- i) Nothing in the Plan will prevent the use of the lands for the ongoing use as a 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.
- ii) Uses permitted in *Core Employment Areas* and *General Employment Areas* that are compatible with residential uses are permitted, as demonstrated by a Compatibility/Mitigation Study when required.
- iii) Sensitive land uses, including residential uses, where permitted adjacent to or near to *Employment Areas* or within the influence area of major facilities, should be planned in accordance with Chapter 2 Shaping the City, Policies 2.2.4.5 to 2.2.4.10. For development within the 30 metre setback adjacent to the rail corridor, a Rail Safety and Rail Mitigation Report will be submitted, peer reviewed and implemented, at the applicant's expense, to the City's satisfaction.
- iv) Development will proceed in a manner that will not preclude additions to the public and private street network, enhanced surface transit and future transit improvements including a GO Transit station located along the CNR/Metrolinx line abutting the south limit of the lands.
- v) Residential uses may only be occupied when funding for the GO Transit station is secured through an agreement(s) between the owner and Metrolinx.
- vi) Prior to the enactment of a Zoning By-law Amendment to permit residential units on a lot, all uses permitted on the lands as of XXX 2024 (NTD: date of enactment of OPA) under existing in-force zoning by-laws continue to be permitted.

c) Non-Residential Development

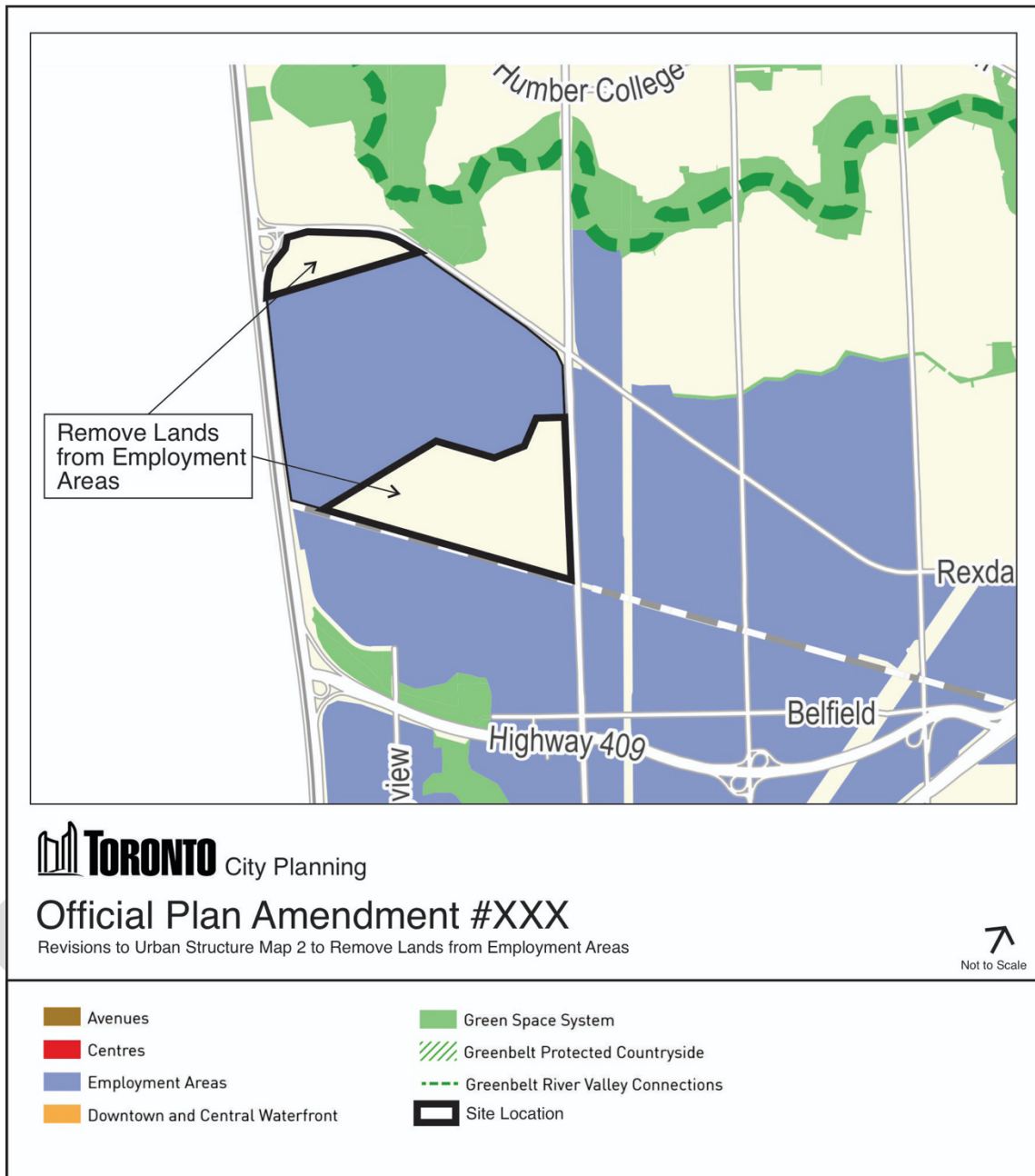
- i) To provide a balance of residential and non-residential growth, non-residential gross floor area will be developed prior to or concurrent with residential development in each phase of development on the lands.
- ii) Non-residential gross floor area should be consolidated in stand-alone buildings or contiguous portions of a base building to encourage a clustering of business and economic activities. To satisfy the requirements of Policy c) i), non-residential gross floor area may also be provided on other areas of the lands known municipally in 2024 as 555 Rexdale Boulevard.

d) Housing

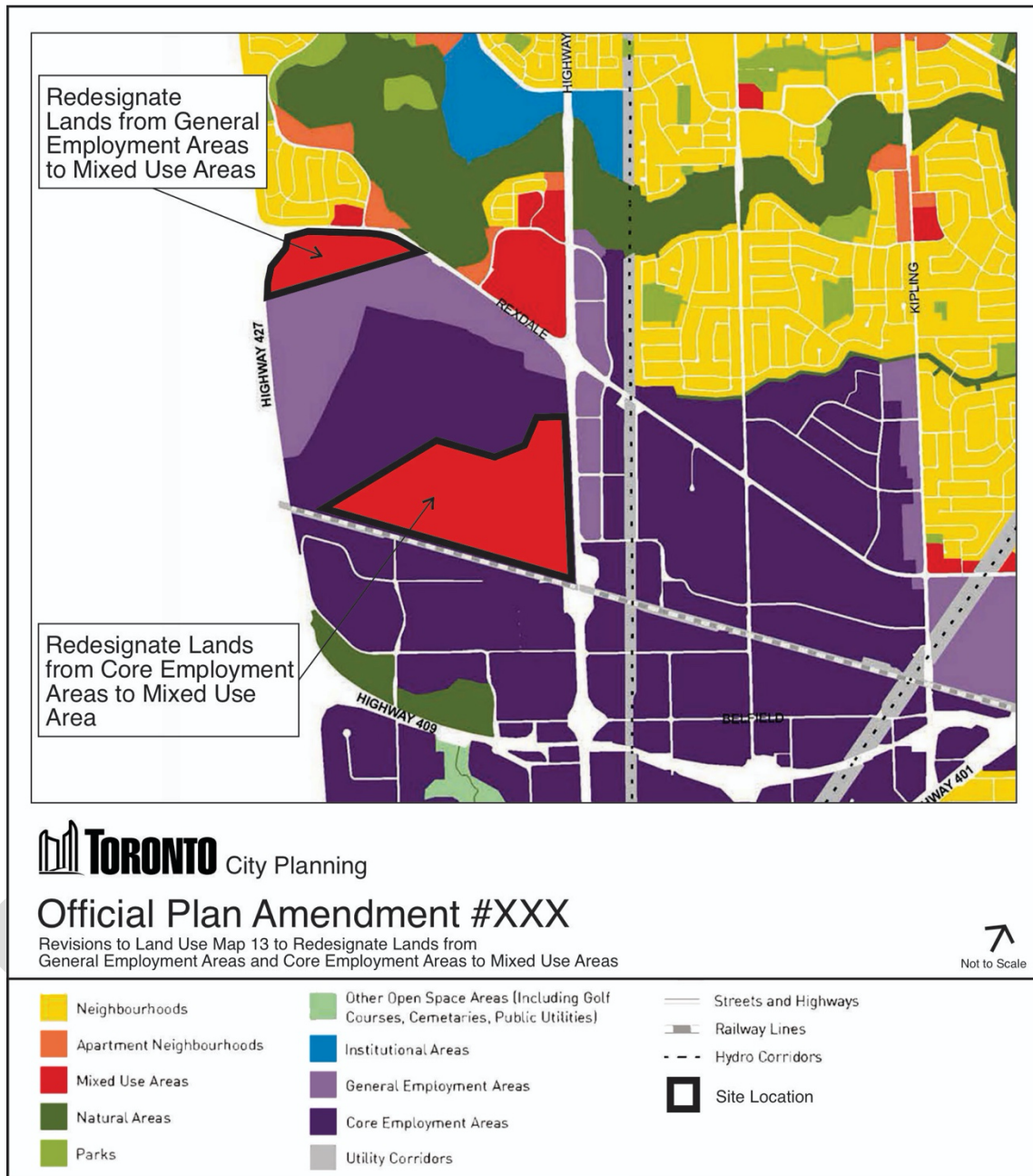
- i) To meet the needs of Toronto's residents, the lands will contain a mix of housing that contributes to the full range of housing in terms of type, tenure and affordability. The amount of land to be developed for new housing on the lands offers an opportunity for the significant achievement of affordable housing, attainable housing and rental housing.
- ii) A minimum of 5% of the total new residential gross floor area on the entirety of the lands at full build-out will be provided as affordable or attainable ownership housing, or affordable or attainable rental housing. Affordable rental housing will be provided for a period of no less than 25 years from the time that each unit is first rented. Where both affordable and attainable housing is provided, a minimum of 30% will be affordable housing. The affordable and attainable housing provided on the lands may be used to satisfy in whole or in part an obligation to provide affordable or attainable units as part of the development of any part of the lands, including where applicable a requirement to provide affordable housing units pursuant to inclusionary zoning. The rent for the affordable rental housing units on the lands shall be an average of 80 per cent of the average market rent, as determined by the average market rent for the year in which the residential unit is occupied by a tenant, as identified in the bulletin entitled the "Affordable Residential Units for the Purposes of the *Development Charges Act, 1997* Bulletin", as it is amended from time to time, that is published by the Minister of Municipal Affairs and Housing on a website of the Government of Ontario. A housing plan will be prepared to demonstrate how this Policy will be implemented.
- iii) The provision of affordable housing required by Policy d) ii) shall be secured through one or more agreements with the City.
- iv) Opportunities to increase the provision of affordable or attainable housing beyond the proportions required by Policy d) ii) shall be explored in partnership with all levels of government and/or non-profit housing providers.
- v) To achieve a balance of residential unit types and sizes, residential development in each phase of development on the lands will include a minimum:
 - a. 15% two- or three-bedroom units; and

- b. 10% three-bedroom units.
- e) Implementation
 - i) New development on the lands will include a comprehensive planning framework implemented through a Zoning By-law Amendment and/or Draft Plan of Subdivision application(s), which should include the following:
 - a. the pattern of streets, development blocks, open spaces and other infrastructure, including adequate space for planting of trees;
 - b. the mix and location of land uses;
 - c. a strategy to provide parkland and to protect, enhance or restore natural heritage;
 - d. a strategy to provide community services and local institutions;
 - e. a strategy to provide affordable housing, pursuant to Policy d(ii) above;
 - f. a strategy for energy conservation, peak demand reduction, resilience to power disruptions and small local integrated energy solutions that incorporate renewables, district energy, combined heat and power or energy storage;
 - g. a strategy for stormwater management and water conservation; and
 - h. a strategy for waste management.
 - ii) Where there is a conflict between the policies of the Official Plan or any other Site and Area Specific Policy and this Site and Area Specific Policy, this Site and Area Specific Policy will prevail.

Appendix 1



Appendix 2



Appendix 3

