Gooderham & Worts

"Materielly robust and spatially intriguing this complex of historical industrial buildings is a small "city within a city". Gooderham and Worts reconnects us, through time with Victorian Toronto, with the production of millions of gallons of spirits, with a town becoming a city. Its substantial masonry masses confront the thinness and transitory nature of modernity. In its empty state, awaiting rehabilitation and reuse, Gooderham and Worts is haunting -- a place charged with memory and the angst of history. It should be preserved and once again become part of the life of Toronto." -- Katherine Govier, Toronto Places - A Context For Urban Design, The City of Toronto and University Press, 1992

Announcement: Mrs. Edna Hudson was elected President of the Toronto Region Architectural Conservancy at the Annual General Meeting February 1994.
April, 1994

Dear members,

Why are we writing you today? Why is the TRAC executive concerned about the redevelopment of Gooderham & Worts (G & W) as proposed by the owner Allied Lyons? Read on!

As part of Arts Week in September 1990 TRAC, along with the Corktown Residents Association, Snook Turner Schoolhouse and the Town of York Historical Society, held an all-day seminar on the future of G & W. There was a series of speakers and a tour of the distillery. Since that time, TRAC has been consistent in its opposition to any redevelopment scheme that would require the demolition of buildings.

The Allied Lyons proposal calls for the demolition of over half of the buildings on the site. These include five rack houses (G, H, I, J, and M), three tank houses (4, 9 and 10), the Maintenance Shop Building No.8 - 9, the Case Goods Warehouse Building No. 74, and the Paint Shop (Building No. 63). Allied Lyons has very good sales people. In order not to communicate the degree of change they are proposing, they have developed new verbs in place of the word "demolition". One such word is "panallization", another is "skelletization". In these cases, the buildings will be removed - they will disappear. Sections of the brick walls will be stored elsewhere and returned to the site when the new buildings are completed. These panels then will be bolted to the sides of the new buildings.

Drivers Jonas, the agent for Allied Lyons, has stated that they will not accept the public interfering with their right to do whatever they want to do on the site. And yet, Allied Lyons accepted the Federal government's declaration that G & W is a national historic site. If the owner did not want public involvement, then it should have refused the declaration, as Ottawa only recognizes a property as a national historic site at the owner's invitation. When the federal government bolted the red plaque onto a wall at G & W, the public expected that genuine consultation with the Crown would take place. With G & W's unique Class "A" status we expected the utmost regard for the buildings. It was clearly "kid-gloves" time. We anticipated an extremely respectful and sensitive treatment of the buildings. What is referred to as minimal intervention. We had in mind, something in keeping with the quality of Iron Bridge Gorge, in Britain or the conversion of the mills at Lowell, Massachusetts. But Allied Lyons' "new" and "improved" G & W, as you will see, is not akin to those inspiring survivors.

Drivers Jonas has described Allied Lyons vision of the "new" G & W as a typical British High Street (the ubiquitous main shopping district, St. Anywhere, UK.). On another occasion, a member of the Allied Lyons design team explained the architectural significance of G & W by relating its similarity to the typical set of red brick huts that are synonymous with the "British army compounds found all around the world." When we heard them make these statements we understood that Drivers Jonas did not understand the site's unique character. Drivers Jonas simply cannot "see" the G & W that you and I see. And that brings us to the dreadful impasse we face today: the city supporting a redevelopment scheme for G & W, that is not in line with international conservation standards.

What's to be done? Read our newsletter and if you are of the same opinion as the TRAC executive, then see the next page for information on whom you should write, to express your dissatisfaction with the desecration of Gooderham & Worts our National Historic Site.

"Adaptive reuse projects, like, the Gooderham and Worts proposal, often run the risk of distorting or destroying the history they are trying to preserve. Too, frequently, the industrial character of the interiors is eroded in the process of accommodating new or mixed uses. Moreover, new construction usually overwhelms the old. It is hoped that allied Lyons and their consultants review the redevelopment plans for the distillery complex to ensure that the integrity of this exceptional Canadian site is not compromised." - Veronica Vallianatou, Editor, Heritage Canada, March/April 1994

There are three general approaches which we feel are suitable for the revitalization of Gooderham & Worts. The most obvious solution is a national historic site managed by the Canadian Parks Service. This approach would maximize public benefit, create a major tourist attraction, and protect the integrity of the resource, but would require a major public investment in acquisition, restoration and operating costs. The second solution is a publicly managed non-profit facility. One such facility could be a co-operatively run centre for cultural industries, where arts organizations, artists and craftsmen, including tradesmen in the building arts of the nineteenth century, could lease space for research and training, production and rehearsal, display and sales, and administration. This approach would foster a sector important to Toronto's post-industrial economy (cultural industries, for example) and pay for itself, but would still require considerable public start-up costs (acquisition and rehabilitation); it would also provide less publicly accessible space than the national historic site. Both the first and second approaches have additional merit in that they would minimize the clean-up of contaminated soil, a real concern in option number 3. The third option is a mixed-use development, but not the current proposal, undertaken through a partnership among government, Allied Lyons and other private-sector corporations with a non-profit interest in the site's conservation. This approach, recommended by the Gooderham & Worts Conservation Working Group, guarantees some degree of meaningful public accessibility, diversifies the economic base of the site, pools the resources of Allied Lyons, other private-sector corporations and government, and ensures site integrity at least to the point of sympathetic adaptive reuse.

The collective approach so far has been to treat the complex Gooderham & Worts site as yet another development processing exercise. Both Diamond-Schmitt and the Conservation Working Group identified the need for co-ordinated action, not merely planning review. Perhaps in taking the time now to explore ways of revitalizing the site other than loading it with density we can make up for the time lost in the planning process.

What Can Be Done?

The boom years of the 1980s are over, and the new economic realities facing Toronto are having a profound impact. The answer is not to full back on the nostalgia of office towers looming everywhere on the horizon: the office towers are empty. Toronto is now part of a continental trading bloc, and a growing portion of Toronto's work can be accomplished from home work places or elsewhere in the world.

The heritage community finds itself in the vanguard of new, realistic development for the 1990s and the turn of the 21st century. We have to challenge the old assumptions that development is worthwhile, even when it destroys the natural environment or the distinctive cultural attributes of the community. Toronto, which has lost almost all intact areas in its nineteenth century core, needs Gooderham & Worts to attract visitors. Gooderham & Worts is worth a lot more as a tourist destination than as a dubious mixed-use development of banal design.
"The current proposal will, for the first time in the site's (150 year) history profoundly change its use and meaning." – Lyn Hamilton, Ministry of Culture Tourism & Recreation, March 2, 1994

"It is surprising that this application treats the cornerstone of accepted conservation practice the Heritage Masterplan as a bargaining tool to secure higher density ... the Heritage Masterplan must be the starting point". [And not, as with G & W as an afterthought.] – Robert Legros, Canadian Heritage Department, March 1, 1994

The March 4, 1994 afternoon meeting of the Land Use Committee was a full house. Both the federal and provincial governments submitted their comments in writing. After eight deputations had spoken against the proposal and offered alternatives (one speaker had no objections to the Allied Lyons proposal), Councillors Hall and Levine defended their position by ridiculing those who opposed the proposal. Councillor Levine went out of his way to chide both the federal and provincial governments for their inaction on other heritage matters. Councillor Kyle Ras later said to the press, "People will soon be able to become part of the historical fabric of this site." Councillor Steve Ellis summed up the meeting best he said, "This project may not be perfect, but what is nowaday's is a starting point". While Allied Lyons as a private property owner had every right to apply for as much density as it could get, the City of Toronto has had an obligation to protect the public interest in the development of this sensitive site. Instead, serious planning issues, such as the wise use of existing heritage assets, have been glossed over in the notion that development or possible development, sustainable or otherwise, is better than none at all. Gooderham & Worts deserves better treatment.

Alternatives

Alternatives to the Allied Lyons proposal have been raised, but they have not been seriously considered. Before we suggest some different approaches to the site's use and development, it would be appropriate to have criteria by which to judge them. First, anything proposed for Gooderham & Worts should reflect the overwhelming public interest in the site. Does the proposal maximize public benefit – for the education and enjoyment of the populace and for the long-term economic health of the city? The second question concerns economic viability. Can the proposal pay for itself, and how much public investment is appropriate? Third, the proposal should address Allied Lyons' financial obligations and its contribution to revitalization of the site. Does the proposal recognize Allied Lyons' real costs (current land value, building maintenance, site security and property taxes minus rental revenue from film companies and any business loss advantage), and does it offer a partnership role in development for Allied Lyons? Last, and most importantly, anything proposed for Gooderham & Worts should conform to international standards for conservation. Shouldn't the proposal protect the integrity of the resource?

"There is nothing of the kind anywhere else on this scale." – Douglas Richmond, from the video "Red Brick & Pure Spirits: Toronto's Gooderham & Worts Distillery, 1832-1990"

Draw a line in the sand with us. Save Gooderham & Worts! Let’s find a new way to do business. Write, fax or call the following officials before May 30, 1994 when Toronto City Council deliberates the Allied Lyons proposal. For your convenience we have provided a pull-out section in the middle of your newsletter.

- Mayor June Rowlands and Members of Council, c/o City Clerks Office, New City Hall, 100 Queen Street West, Toronto, Ontario, M5H 2N2, (416) 392-7001 (ext.), 392-0026 (FAX) – Ask them to reject the Allied Lyons application in its present form.
- "Is Silent June Rowlands so myopic she can’t see the mess she’s getting us into? Maybe she hopes [that the destroyed heritage sites] will be forgotten by the time the next civic election rolls around. But if nobody reminds her, I certainly will." – Pierre Berton, Toronto Star, January 29, 1994
- "Metro Chairman Allan Tonks and Members of Council, Metro Hall, 7th Floor, 55 John Street, Toronto, Ontario, M5V 3C6, (416) 392-8001 (TEL.), 392-7979 (FAX) – Ask them to advise Toronto City Council that the Allied Lyons application in its present form be rejected as the funds for Metro funded infrastructure (schools, sewage, transportation etc.) have not been identified as a budget line item.
- "Anne Swarbrick, Minister of Culture, Tourism and Recreation, 78 Bloom Street West, 6th Floor, Toronto, Ontario, M7A 2R9, (416) 325-6200 (TEL.), 325-6195 (FAX) – Ask her to seek cabinet support for declaring a provincial interest in the Gooderham & Worts site under the Planning Act. Request that she establish an intergovernmental committee that with Allied Lyons would discuss new uses appropriate to the site and the financial means to conserve it. Ask her to announce provincial interest in providing financial support to a conservation project at Gooderham & Worts, provided that the present scheme is abandoned or substantively reworked.
- "This controversy underscores the need for improved legislation to protect designated landmarks and to ensure effective methods of enforcement." – Veronica Valliancourt, Editor, Heritage Canada, March/April 1994
- "The Board of Governors of Heritage Canada: ... urges the Province of Ontario to protect the site under appropriate provincial legislation as well as under amendments to Ontario Heritage Act being considered." – Heritage Canada Resolution, February 1994
- "Hon. Michel Dupuy, Minister of Canadian Heritage, House of Commons, Ottawa, Ontario, K1A 0A6 (free postage in Canada), (819) 997-5573 (TEL.), (819) 997-4191 (FAX) – Ask that he announce federal interest in providing financial support to a conservation project at Gooderham & Worts, provided that the present scheme is abandoned or substantively reworked. Request that he expedite the declaration of Gooderham & Worts as a property included on the World Heritage List.
- "I'm amused at the federal government's communication." – Councillor Levine March 3, 1994
- "It is part of our local and national history, and we believe that mere ownership of the property does not morally entitle the owner to alter the public patrimony." – Jane Beecroft, Chair, The Society of Heritage Associates, December 15, 1993
- "Chair David Burnside and Members of the Toronto Historical Board. 205 Yonge St. Toronto, Ontario, M5B 1N2, (416) 392-8287 (TEL.), 392-6834 (FAX). Ask them to reconsider their decision and reject the Allied Lyons proposal in its present form.
- "We cannot transmit cultural values if our roots are only as deep as today." – Edna Hudson, President, Toronto Region Architectural Conservancy, in reaction to the Allied Lyons proposal for G & W.
from March 1993 until June, when the Planning and Development ended the process without a concluding meeting. Supporting the working group in its recommendations was the Architecture and Urban Design Division of the Planning and Development Department. In spring 1993, the division favoured the Diamond-Schmitt preferred massing option and amplified the working group’s concerns about building scale in the Allied Lyons proposal.

On October 26, 1993, the City’s Planning Advisory Committee, made up of citizen appointments, held a public meeting to discuss the Allied Lyons application. Several concerns about the site’s conservation, the project’s economic feasibility and the project’s impact on community services were expressed. Questions from the 100 people in attendance (two-thirds local residents and one-third members of the heritage community) were poorly answered or evaded and, when the minutes were finally made public, often misrepresented.

December 15, 1993 was the first meeting of the Toronto Historical Board where deputants from the public were invited to speak (the notice was not circulated to all who had signed the register at the October 26 meeting), and all but one of the deputants spoke against the Allied Lyons application (the one speaker in favour of the proposal had a project funded by Allied Lyons). In a nine-to-four vote, the Board turned down the application. But at its meeting of January 26, a little more than a month later, the Board reversed its decision, this time without public consultation.

With the compliance of the Toronto Historical Board, the Planning and Development Department was ready to release its final report on the application. In the final report, the department gave Allied Lyons all it asked for, including a bonus for conservation.

The Planning Advisory Committee held another public meeting, on February 16. It rubber-stamped the final report after hearing from those remaining deputants who could stay past the 10:45 p.m. starting time for this item on the agenda. Committee member Councillor Lovias used the occasion to berate the heritage community for having an opinion different from his own.
"It has set a new example of how private landowners and the City can work with the heritage community." – City of Toronto Councillor Barbara Hall, Chair of the Land Use Committee, March 3, 1994

"The process by which this matter has been handled is gravely flawed. The public meeting of 26 October at which the proposal was presented was structured to ensure the minimum of informed public comment from the affected communities. The current meeting of the THB is being held without notification to interested parties who attended the public meeting. These facts in themselves indicate a reluctance on the part of the city and the applicant to deal seriously with their responsibility for public consultation." – Architectural historian Anne M. de Port-Menasce, Toronto Historical Board meeting of December 15, 1993

The Planning Process

Councillors Hall and Levine have asserted that there have been any number of opportunities for public involvement in the review of the Allied Lyons application. Despite these assurances, the public general still has not been given the chance to weigh the facts about the proposal. So far, the planning process has been narrowly focused and recently fast tracked to get the present application approved.

While there were private discussions between Allied Lyons and the City Planning and Development Department in the 1980s, Allied Lyons formally applied for an official plan amendment and rezoning in March 1992. Previously, in 1991, Roger Du Toit Architects and others had sketched out a proposal in Gooderham & Worts: An Urban Design Proposal. This scheme is largely the same as the current proposal.

Heritage conservation has figured prominently as an issue in the planning process, not as a serious concern, but as a driving force for the approval of the application. There have been no series of reports on the conservation of the site, and the Planning and Development Department has ignored their recommendations.

In 1990, the Planning and Development Department (the Toronto Historical Board and the Ontario Heritage Foundation were also sponsors) released the 200-page Diamond-Schmitt urban planning and heritage study for Gooderham & Worts and the adjacent Triangle Lands. The study’s authors recommended a redevelopment strategy where most of the existing buildings at Gooderham & Worts would be retained and new development on the site’s perimeter and the Triangle Lands would not exceed 18 storeys in height.

In September 1992, the Planning and Development Department’s preliminary planning report on the Allied Lyons proposal identified serious problems, including the high density in relation to the existing St. Lawrence and Corktown neighbourhoods (2.3 and 1.0 times coverage respectively) and to the existing context of buildings, the building heights, flooding potential, unclear historic preservation strategy and transportation infrastructure implications.

In November that same year, the Planning and Development established the Gooderham & Worts Conservation Working Group, an intergovernmental committee of heritage professionals representing the Toronto Historical Board, Metropolitan Planning Department, Ministry of Culture, Tourism and Recreation and the Canadian Parks Service. The working group’s February 1993 report to the Planning and Development Commissioner, a reflection on both the Diamond-Schmitt report and the Allied Lyons proposal, advocated adaptive reuse of most of the buildings and new development not exceeding 14 storeys on the site’s perimeter. The working group introduced two concepts: 1) that the government assist in finding a major new use that would occupy as many existing buildings as possible the site and 2) paying for the demolition and operating costs of both the site’s historical interpretation and cultural uses through the philanthropy of a private corporation with a non-profit interest in the site’s conservation. The working group met with Allied Lyons representatives and City officials to explore its recommendations

THE REDEVELOPMENT OF GOODERHAM & WORTS: A CULTURAL RESOURCE ON THE LINE

"It’s a miracle that this complex has survived so nearly intact, and this isn’t an opportunity that will come again. This is our one chance, our last chance to protect something that is of transcendent importance as an industrial monument." – Douglas Richardson, Professor of Architectural History from the video Red Brick and Pure Spirits: Toronto’s Gooderham and Worts Distillery, 1832-1990.

"We should feel good with whatever has been achieved today." – City of Toronto Councillor Barbara Hall, Chair of the Land Use Committee, March 3, 1994

"I would like to reiterate the national significance of the complex by summarizing the 1988 recommendations of the Historic Sites and Monuments Board to the Environment Minister, that: (G&W) is an imposing landmark, containing a number of buildings that collectively bear witness to the evolution of the Canadian distilling industry, the Gooderham and Worts complex is of national historic and architectural importance and that those entrusted with the future of the distillery are to preserve the complex intact as on the basis of the information before it, the distillery was clearly seen to be a remarkable collection of well-preserved structures associated with a single Canadian industry of considerable importance." – Christian Cameron, Historic Sites and Monuments Board of Canada, April 1993

WHAT’S AT STAKE?

On March 3, 1994, the City of Toronto Land Use Committee approved Allied Lyons’ application to redevelop the Gooderham & Worts distillery complex, a project that would fundamentally alter Toronto’s premier industrial site. The huge British Food and beverage company will be able to demolish or dismantle half of the existing buildings and add new construction up to 23 storeys in height.

Today, Gooderham & Worts is an eleven-acre site of 30 well-preserved buildings on the edge of downtown Toronto. Started in 1832 and in operation as a distillery until 1990, the red brick and limestone collection of distillery, malhouse, rack and tank houses has always been a landmark — visible from the old harbour, the main rail line and the Gardiner Expressway. Gooderham & Worts is also a signpost in Toronto’s history — the best-surviving example of the period of industrialization following the arrival of the railway in the mid-nineteenth century.

Recognizing its importance, the City of Toronto designated the property under the Ontario Heritage Act in 1976, a year after the Act was proclaimed. In 1984, the Historic Sites and Monuments Board of Canada declared Canada’s oldest-surviving distillery a national historic site. In 1992, the property was only one of five included in the First Annual Report of the Canadian Register of Heritage Properties. Gooderham & Worts is considered the best-preserved, nineteenth-century distillery complex in North America. And the Province of Ontario has requested that Gooderham & Worts be included on the World Heritage List under the Convention Concerning the Protection of the World Cultural and Natural Heritage.
The City of Toronto has lost a tremendous opportunity to conserve and enhance the site. The City holds the approval powers for changing the current official plan and zoning by-law to permit the mixed-use development proposed by Allied Lyons. In a desperate bid for any kind of redevelopment activity, the City of Toronto is set to pass the by-laws for the site-specific official plan amendment and rezoning and fritter away a cultural resource of unsurpassed value. Our newsletter points out the flaws with the redevelopment proposal and the planning process which has led us to this sorry state of affairs. We invite you to consider the project’s ramifications on Toronto, Canada and the conservation field in general, and join us as we mount our campaign.

THE REDEVELOPMENT PROPOSAL

The Land Use Committee has loaded the Allied Lyons’ proposal, yet the heritage community has been appalled by it. While both sides agree on the significance of the site, there are two very different attitudes toward the planning approach for Gooderham & Worts. The Allied Lyons’ proposal treats the Trinity Street core of Gooderham & Worts as a minor component in a large redevelopment concept, similar to any number of developments that have characterized Toronto’s financial district, masquerading as conservation.

On the other hand, the heritage community sees the whole site as a unique urban asset, a cultural monument that demands the highest standards of conservation treatment. Both the agents for Allied Lyons and the conservationists realize that the site is no longer viable as a commercial distillery and that new uses are needed. While Drivers Evans, the agent for Allied Lyons, believes it can animate the site through redevelopment; the heritage community is convinced that only through a conservation approach can the site get new economic life.

Before we evaluate the Allied Lyons proposal provided below is a brief summary.

The Allied Lyons Proposal as of March 3, 1994

- Retention of most of the exteriors of the 11 buildings in an area called the Trinity Street Heritage District (those buildings facing, adjoining or nearby Trinity Street). The 1886 wing on the Hitam Walker Offices would be demolished. A glass gallery would be added to the red brick malthouse. It is unclear how many new doorways and loading entrances would be inserted in the buildings.
- Gating of most of the interiors of the Trinity Street buildings. Machinery and other artifacts, including those in the stone distillery, would be removed and relocated within the buildings. The elaborate mezzanine structure in Rock House “D” would partially be preserved in a theatre.
- Mostly retail and office use in the Trinity Street buildings, with the exception of Rock House “D” as a theatre and a 500 square metre interpretation centre in the Boiler House.
Article 9 refers to the need for historical study prior to restoration. The Allied Lyons proposal was conceived long before any thought of a conservation master plan, i.e., a blueprint for co-ordinated conservation of the site. (The appliant is developing one now.) The City's design guidelines (one calls for new construction to have different materials from the nearby ubiquitous red brick fabric of the existing buildings) and the descriptions for conservation easements in the process of preparation are also without the benefit of a conservation master plan to guide them. "The Toronto Historical Board has recommended to City Council a series of safeguards that [they believe] will protect the long-term heritage integrity of the site. . . . The heritage easement agreements are perhaps the most important safeguard because they provide permanent protection for the site." --David Burnside, "Toronto Historical Board Approves Redevelopment Scheme", Heritage Canada, March/April 1994

Article 11 remarks on the importance of all periods of construction in the life of monumental buildings. The demolition of the 1886 wing on the Hiram Walker Office for urban design goals is the most glaring offense here; but the 1927 Case Goods Warehouse, which helps document the twentieth-century expansion of the complex and is in scale with its nineteenth-century neighbours, was never given a chance to perform a new function.

Article 13 discusses additions which are inappropriate to existing buildings. For the most obvious example of the proposal's inappropriate additions, the Tank House Design Centre in the eastern part of the site would submerge the walls of three, one-storied tank houses under six storeys of new construction and interrupt the existing grid of lanes. In addition to the partial retention of these three buildings, all but one of the other one-storied tank and rack houses would be lost in new construction.

Allied Lyons has consistently stated that this is a privately funded project. How can this be when the taxpayer will be paying for all the new infrastructure such as roads, transit, sewers, schools etc.? One could question the proposal on grounds other than heritage conservation. Toronto Transit Commission service is poor and there is no GO Transit stop (but parking standards based on aggressive increases in transit use), and the necessity for City investment in upgrading sanitary sewers.

Also worthy of serious consideration is the possibility that the soil under G & W may be contaminated. We remember that the adjacent polluted Azipriell lands were abandoned by the City of Toronto after it was assembled for housing, because it was too expensive to clean.

The Allied Lyons' proposal -- doubtful in economic viability -- would certainly extinguish any meaningful place for Goederher & Worts in the life of Torontonians and on the itinerary of tourists.

"The Board (THB) should not consider fragmentation and/or redistribution of architectural parts of a heritage structure as acceptable building preservation practice because of the contaminant destruction of the structure's original uniqueness and setting." -- as above

"It is . . . alarming to learn that the applicant proposes to demolish some buildings, to add storeys to others, to incorporate original walls into high density construction ... (that) dwarf the historic buildings." -- Julia Beck, President of the Architectural Conservancy of Ontario, October 22, 1993

"The Toronto Historical Board policy on partial retention of heritage buildings is based on the principle that the unique historical and/or architectural character of a heritage building is substantially diminished when the building is not preserved in its entirety. When a property is designated under the Ontario Heritage Act, the reason for designation may describe only the most noteworthy element(s), but it should be inferred that the element(s) exists in every case as part of a whole building in its setting on the property." -- Partial Retention Policy of Heritage Buildings: adopted by THB May 3, 1989.

"While industrial heritage has a dark side, both in environment and human terms, at the same time it provides opportunities. The toxic wastes deposited by obsolete industrial processes in soil and water are now a major concern for environmental protection, risk management and public health." -- John Weiler, Vice-President of Heritage Canada, Living With Our Industrial Past, Heritage Canada March/April 1994

"Partial retention and reincorporation into new construction (facadism) of the Maintenance Shop's walls and all the rack and tank houses except for the Dematuring Building and Rack House "D" in the Trinity Street Heritage District (eight buildings to be partially retained in total).

"Removal of the roof and parts of the exterior brick walls of the Paint Shop for an open-air sculpture garden.

"Demolition of the Case Goods Warehouse, Rack House "M" and the storage tanks (note the demolition of the Hiram Walker Offices wing as described above).

"Construction of three apartment complexes in the western portion of the site, ranging in height from 13 to 23 storeys.

"Construction of two apartment buildings of 11 and 15 storeys respectively on the north side of Mill Street with rock house walls as podiums.
Construction of the six-storey Tank House Design Centre with tank house walls as podium.

Construction of the Cherry Street Offices of 16 storeys, incorporating tank house walls. The building would be used for data processing.

Construction of the 16-storey South Offices for data processing.

Construction of the eight-storey Trinity Offices.

We used the guidelines from The International Charter for the Conservation and Restoration of Monuments and Sites for assessing the Allied Lyons proposal.

Article 3 of the Charter pertains to the proper fill of new use with existing buildings. There are three concerns with the uses proposed by Allied Lyons.

First, only a small portion of the redeveloped space, including Trinity Street, is allotted for public uses. In the Trinity Street Heritage District, Allied Lyons is offering Rack House "D", for conversion to a theatre, and a small interpretation centre. Under the proposal, the public would enjoy few opportunities to interpret the site as it was — a working distillery.

Second, retail use is predominant in the Trinity Street core. Besides limiting interpretation, retail functions will require considerable interventions in the building fabric of Gooderham & Worts’ industrial buildings.

Last, both the retail and office uses proposed for the surviving buildings do not stand up to scrutiny as those sectors of the Toronto economy are unhealthy. Retail spending in the Toronto area has fallen considerably during the recession and will require a longer period of recovery than expected. Many streets built over the last century expressly for shopping have alarming vacancy rates. Toronto has a glut of empty office buildings, and there is no expectation that the market will change much over the next decade. Toronto City Council acknowledged this recently when they made the controversial decision to permit the conversion of office buildings to residential use. It is foolish not only to lose Gooderham & Worts for educational, arts and tourism purposes but also to have the new uses in the recycled buildings fail.

He (Davies) emphasized that "...the site cannot be turned into a museum because the project economics do not permit it..." — Walter Davies (agent for Allied Lyons), Planning Advisory Meeting, October 26, 1993

Article 6 addresses new construction in scale with the existing setting. Today and for the last 135 years, the stone distillery at five storeys (nine modern residential floors) has been the landmark on the site. Red brick buildings amid midst leaves complete the historic setting. In the Allied Lyons proposal, new buildings rising to 23 storeys at Parliament and Mill Streets would dwarf the existing. This new construction would seriously damage the relation of heights among existing buildings, but it would also overshadow the adjacent St. Lawrence Neighbourhood, a model community of the 1970s and '80s. Furthermore, the placement of the new buildings is crowded close to historic buildings, and the abrupt differences in height between old and new would create starting contrasts.

Article 7 regards the limited circumstances when partial retention is appropriate. Following the Charter's lead, the Toronto Historical Board has developed policies limiting partial retention. The Board has characterized fragmentation and/or redistribution of architectural parts of a structure as unacceptable preservation practice. Yet in the Allied Lyons proposal, several buildings would have their walls removed, underground parking constructed below, and the walls reassembled. New buildings would sprout within the existing walls of other buildings. The Paint Shop would be transformed into a ruin, and would survive as such at least until the elements deteriorate the remaining brick portions.

[Allied Lyons will be adding 2,215 million sq. ft. to the already "...18.6 million sq. ft. available. ...with a glut of empty office space in the market, new additions to the supply are an important factor in future market conditions. In Aug. 1993 the 1.8 million sq. ft. Bay-Adelaide Centre was postponed indefinitely." — Collars Commercial Property, Focus Toronto, Property Review, September 1993]
Anne Swarbrick
Minister of Culture, Tourism and Recreation
77 Bloor Street West, 6th Floor
Toronto, Ontario
M7A 2R9

Mayor June Rowlands and Members of Council,
c/o City Clerks Office, New City Hall,
100 Queen Street West
Toronto, Ontario,
MSH 2N2
Mayor June Rowlands and Members of Council,
c/o City Clerks Office, New City Hall,
100 Queen Street West
Toronto, Ontario, M5H 2N2

Mayor Roland and Council:

We ask you to reject the Allied Lyons application in its present form because the Gooderham & Worts site is one of Canada's most outstanding early Victorian complexes surviving today. We all have stake in the outcome of current redevelopment plans.

Sincerely,

[Signature]

Name & Address

Anne Swarbrick
Minister of Culture, Tourism and Recreation
77 Bloor Street West, 6th Floor
Toronto, Ontario, M7A 2R9

Dear Minister Swarbrick:

I ask you to seek cabinet support for declaring a provincial interest in the Gooderham & Worts site under the Planning Act. Please establish an intergovernmental committee that with Allied Lyons would find new uses appropriate to the site and the financial means to conserve it. Finally, I ask you to announce provincial interest in providing financial support to a conservation project at Gooderham & Worts, provided that the present scheme is abandoned or substantively reworked.

Sincerely,

[Signature]

Name & Address