

B.M.R. COMMENT



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METRO CENTRE: VENTURE INTO THE GREAT UNKNOWN

In principle, the Bureau of Municipal Research favours redevelopment of the lands involved in the proposed Metro Centre development¹; however, we believe that at present there is such a shortage of public information on the project that final approval of the development should not be granted.

Responsible government is dependent on careful public scrutiny of its actions and an assurance that public actions are based on sufficient knowledge about the background and consequences of those actions. Over the years, these principles have been abiding concerns of the Bureau whose activities have been directed toward providing responsible public scrutiny of government action. We have therefore been profoundly disturbed by the demonstrated lack of information provided to either the general public or the public's elected representatives - information that is essential before a reasoned and responsible decision can be made about the mammoth Metro Centre development.

Despite the lack of information, the Metro Centre proposal is being propelled through the Toronto City approval process like a mainline express through the night - with stops only for minor repairs. Many of these repairs have been executed in order to weaken strong City Planning Staff recommendations² designed to "ensure" (rather than mildly "encourage") the attainment of specified public objectives still not provided by the proposal. These recommendations have been weakened in order to provide the developers with the "flexibility" they desire. Among these public objectives were the provision of specific forms of future public participation, the assurance of a more efficient transportation terminal, the inclusion of specified amounts of low-income

¹Metro Centre is a joint proposal by Canadian National and Canadian Pacific to redevelop 187 acres of land lying between the foot of the present downtown and the Lake (more specifically, between Yonge, Bathurst, Front and the Gardiner Expressway; with a two block northern projection between Front, Simcoe, King and John). The gigantic proposal consists of 4 major elements: a transportation terminal area, a commercial-office area, a communications area, and a residential area. It is anticipated that development would be staged over some 15-20 years and would transform the shape of the City.

²City of Toronto Planning Staff, Central Harbour Part II Official Plan, September 14, 1971 and October 14, 1971.

and family housing, and the provision of public parkland deemed adequate to serve the needs of both residents and workers in the future development. The earlier nocturnal reference is to the fact that the recent City Buildings and Development Committee decision to approve the Central Harbour Part II Official Plan (now called Part II - Metro Centre Area) was made at the absurd hour of 4:15 AM.

This COMMENT is simply a compilation of some of the questions that still, after 3 years of planning and direct questioning of the developers, remain unanswered.

Development Agreements

What are development agreements? And, more particularly, what specific forms of public participation and what appeal procedures are involved in development agreements?

In June, Toronto was authorized, by an amendment to the City of Toronto Act, to make development agreements with the developers of Metro Centre. "Development agreements" were not precisely defined. And, unlike restricted area by-laws and amendments, official plans and amendments, and subdivision plans, development agreements are not specifically covered by the Planning Act which outlines clear participation and appeal procedure.

Perhaps the most succinct statement about the precise status of development agreements for Metro Centre is the following response by the City Solicitor (dated November 26, 1971) to a request from the Association of Women Electors in Toronto for clarification of the scope and role of development agreements:

It is not possible at this time to deal with this matter in a precise manner. Therefore the subject of the request is treated generally because the answers to the precise questions raised are dependent upon various issues of policy not yet determined by Council.

These policies remain undetermined by Council. This is particularly disturbing in light of the fact that, as indicated by the Part II Plan, and stated by the City Development Commissioner, "development agreements will be the main vehicles for implementation of the Metro Centre development and the obvious means of achieving Council's policies in this area". City Council and ultimately the Minister of Municipal Affairs are being asked to approve a plan when they do not clearly know what the major implementing tool is.

Probably the major concern about these development agreements is that they lack specified forms of public participation and appeal procedures. Neither the Metro Centre Area Part II Plan nor any Council policy statement has provided specified forms of public participation and appeal procedures. Detailed forms of participation were, in fact, deleted from the Part II statement. And nobody has addressed the question

of appeals procedure, although, as the Bureau has stated in the past, "In any decision-making system, the clarity and availability of appeals are extremely important."³

The concern about public participation has been expressed, for example, by the Assistant Supervisor, Official Plans Section, Community Planning Branch, Department of Municipal Affairs in a letter dated 3 September 1971:

This brings me to the second matter of major concern, the implementation of the policies of this Plan... I note that you have attempted to write into the Official Plan certain procedures that would involve the public in the drawing up of the proposed development agreements⁴. We are of the opinion, however, that such an approach cannot provide the same opportunity for public participation that is given by Section 35 of The Planning Act with its provisions for proper notification, public hearing before an independent tribunal (the Ontario Municipal Board) and appeal.

In sum, it is profoundly disturbing that the present Central Harbour Part II Official Plan seems to be proceeding rapidly through the approval process without Council - or anyone else - having a clear idea of what its main implementing tool really is. Not only should these questions be answered prior to final approval of the Plan; but also, if the public participation and appeal procedures are inadequate, another implementing technique should be used.

Transportation

The importance of this development (which will incorporate roads, subway, GO and Mainline trains and perhaps bus and airline terminals) for the local, regional and even national transportation systems is obvious. Many questions, however, still remain, and much pertinent information necessary for rational decision-making is lacking.

One consistently stated public objective for this area has been to provide improved facilities for the movement of people between the various modes of transportation. Improvement would include shortening the time/distance between modes and consolidating all modes into a comprehensive transportation terminal. At present, the distance between GO trains and Union Station Subway is about 680' (measured from wicket-to-wicket and excluding mezzanine and platform distances) and the distance between mainline trains and subway is about 740'.

³Bureau of Municipal Research, Urban Development and the Ontario Municipal Board, (Toronto: Winter 1971), p. 14.

⁴Even these assurances have been deleted from the September 14 draft plan.

Metro Centre Developments proposes to move the tracks south toward the Gardiner Expressway and the train terminal southwest to the foot of an extended University Avenue. The Union Station Subway would remain where it is at present, while Union Station above would be demolished and replaced by commercial and office towers.

In the Metro Centre proposal, how far apart will the subway and GO trains be and how far apart will the subway and mainline trains be? This is, obviously, a basic concern, particularly in light of the fact that greater emphasis is likely to be placed on rail and public transit in the future. But there is still considerable uncertainty about the answer. See Table I which compares the differing estimates given by the Chief Planner and the Development Commissioner in reports dated December 1, 1971. This table indicates that at least some distances will probably be longer than the present distances in Union Station. It is interesting to note that there is also a difference about the length of the platforms and the number of tracks.

How far apart should the trains be? What is a reasonable and desirable distance? At present, the proposed Part II Plan gives no guideline as to what constitutes "an efficient, attractive, and convenient transfer of people between the interchange, the aforesaid Downtown Area, and the Bayfront Area" (Section 2.2(a)(i)), since the City Planning Staff recommendation of 300' between GO and subway has been deleted.

Why can the superb old Union Station not be incorporated into the Metro Centre development? And, if it is economically and physically possible to retain it, why is a provision to this effect not included in the Metro Centre Area Part II Plan? Many questions about Union Station have been raised. The answers require further study and the approval of the project should await these answers. It has been eloquently argued that not only is Union Station a superb architectural and historical monument, but also an eminently functional building. Rather than dispersing transportation elements (as the present Metro Centre proposal appears to do), a new development should draw them together. Proposals have been made for drawing facilities together at Union Station - proposals that would not only make possible the retention of a magnificent building, but would also reduce (rather than increase) distances between modes.

The economics of the situation are also unclear. In a recent speech, a Metro Centre Developments representative, made the following interesting comment:

To support the very large costs of moving the rail corridor and building a modern transportation complex it is essential that the Front Street site (i.e., site now containing Union Station) be redeveloped...⁵

If this is really the major reason for redeveloping that site, it would seem that the developers would save money by simply redesigning the present

⁵Donald S. Anderson, "Metro Centre: An Influence on Toronto's Tomorrow", Address to the Canadian Club of Toronto, November 22, 1971, p. 9.

TABLE I

<u>Distance</u>	<u>Chief Planner</u>	<u>Development Commissioner</u>
GO - Subway, Wicket-to-Wicket I*	500'	500'
GO - Subway, Wicket-to-Wicket II**	1050'	none given
Mainline--Subway, Wicket-to-Wicket I*	1450'	1100'
Mainline--Subway, Wicket-to-Wicket II**	2000'	none given
GO - Subway, Average Train-to-Train I***	550' 1250'	900'
GO - Subway, Average Train-to-Train II****	1800' or more	none given
Mainline - Subway, Average Train-to-Train I***	1450'-3000'	1400'
Mainline - Subway, Average Train-to-Train II****	up to 3600'	none given
Length of GO Platforms	c. 600'	1000'
Length of Mainline Platforms	Min. 1400'; max. 1800'	2900'
Number of GO Tracks	2 - 4 (or more if mainline track used)	2 - 4 (or more)
Number of Tracks for Mainline & other uses	5	11?

*Walking distance excluding platform and mezzanine distances, if Union Subway Station is expanded and if Metro Centre Developments acquire a piece of federal property.

**Walking distance excluding platform and mezzanine distances, if Union Subway Station is not expanded and if Metro Centre Developments do not acquire a piece of federal property.

***Walking distance between trains if Metro Centre Developments acquire a piece of federal property. Stating that it is difficult to determine an "average", the Chief Planner gave the shortest and longest possible walking distances between trains.

****Walking distance between tracks if Metro Centre Developments do not acquire a piece of federal property. Stating that it is difficult to determine an "average", the Chief Planner gave the shortest and longest possible walking distances between trains.

All statistics used are based on reports dated December 1, 1971.

Compare with present GO-SUBWAY WICKET-TO-WICKET DISTANCE OF 680' AND MAINLINE SUBWAY DISTANCE OF 740'.

station. But even if the real reason for developing that site is not to pay for new transportation facilities, it is still unclear why this particular Front Street site must be redeveloped in a way that must destroy Union Station. Why can the proposed commercial and office towers not be located elsewhere on this huge site of 187 acres? (for example behind the present station, where they would still have a superb relation to both transportation facilities and to the rest of downtown).

The Buildings and Development Committee passed a motion suggesting "that Council view with favour the retention of at least the Great Hall of the Union Station as part of Metro Centre for public use as a convention centre, etc."; that Metro Centre Developments Ltd. meet with a committee headed by architect-planner Anthony Adamson "for an exchange of views on how the Great Hall may be retained" and report back to Council by the end of February; and that the Buildings and Development Committee "feels that any retention of the Great Hall should result in a transfer of densities or a bonus."

The Bureau feels that, in light of the many questions unanswered and proposals made, the above recommendation is not adequate. We suggest that final approval of the Metro Centre proposal await the report of an independent task force assigned to do a feasibility study of both the physical and financial aspects of incorporating all or part of Union Station into a transportation centre or adapting it for some other appropriate use in the Metro Centre development. It has not yet been proved that Union Station could not be an efficient transportation terminal and it has not been proved that its retention would constitute an economic burden on the developers. Only an independent review could adequately access these questions. If this review finds that Union Station could be incorporated in the development, a clause to that effect should be inserted into the Metro Centre Area Part II statement. Decision on possible bonuses should also await the results of a financial analysis.

Other transportation questions remain, but perhaps one of the most important is what is the effect of the decision to halt the Spadina Expressway on the Metro Centre proposal? Metro Centre Developments denies that the Spadina decision will have any effect on their development.⁶ The Chief Planner, however, in a cover letter to the June 22, 1971, Further Study and Plan For the Central Harbour has stated:

Before an Official Plan Part II can be finalized, the effect on the Central Harbour Plan, and particularly on the Metro Centre proposals, of the decision to halt the Spadina Expressway has to be determined. Questions related to the accessibility, proposed

⁶The "Spadina Decision" refers to the decision by the Ontario Cabinet to overturn a decision of the Ontario Municipal Board and halt further construction on the William R. Allen (Spadina) Expressway, being built from northwestern Toronto to the centre of the downtown. The denial of any effect on Metro Centre came in a letter from Metro Centre Developments Ltd. to the Planning Board of the City of Toronto, June 22, 1971.

densities, the design of the transportation interchange, relevant parking policies, the accommodation within the development of additional transportation routes for both existing and new modes of transportation, have to be considered. These require additional information and comment from senior levels of government which could have a significant impact on the Central Harbour Plan.

At present, Metro Council is reviewing the Metropolitan Plan and its transportation elements in co-operation with the Province, Toronto Transit Commission, and Federal Government. Although these authorities have not raised an objection to the processing of the Metro Centre proposal as a result of the Spadina decision, planning logic would seem to support the conclusion that final approval of the proposal should be delayed until it can be re-evaluated in light of the Spadina decision.

Housing:

Metro Centre could provide an excellent opportunity for providing mixed housing in downtown Toronto - a mix that would include family and low-income housing, as well as the luxury apartments being rapidly built elsewhere in the inner-city. The need for such housing is well supported. Both CMHC (in a letter dated August 24, 1971) and OHC (in a letter dated August 27, 1971) supported the City Planning Staff in its use of housing projections based on the Paterson report. OHC favoured the inclusion in the Part II Plan of definite policy statements about low-cost housing and family housing, and also favoured a density of 2.5.

It is our feeling that the wording of the policy statements in the Official Plan should be quite definitive in respect to low cost housing with clear direction being given to the future developers of the area in question. If the statements are not precise, we may find it difficult in the future to obtain a desirable amount of low cost housing in the Central Harbour...

We envision that our problem in the future will be not the development of high density, low bedroom count projects in the core area, but rather, the development of larger family units at relatively low densities. It is this type of housing which we would strongly urge be required by the Official Plan. (August 27, 1971)

Such precise policy statements were deleted from the Plan, the residential density was raised to 3.0 and the provision that limited the total number of units to 8600 was deleted. Metro Centre Developments has made verbal and written assertions that they expect that both family and low-income housing will be included. But (supported by the Development Commissioner and Redevelopment Advisory Council) they resisted the inclusion of clauses in the Part II Plan which outlined a minimum amount of such housing (i.e., 500 units of a total of 8600) and precisely define family housing (in terms of bedroom-count and density or building height).⁷

⁷Section 3.3(b) (iv) (aa) through (ee), p. 17 in Central Harbour Part II Official Plan² September 14, 1971.

The developers say that this can be covered later in development agreements and that the mix will depend on the market.⁸ Development agreements, however, have to agree only with the Part II Plan. Since the Part II Plan contains no precise clauses requiring (rather than "encouraging") minimum amounts of aspecified type of family and low-income housing, there is no guarantee that this high priority type of housing will in fact be built. Given the need for family and low-income housing and the developers' stated intentions to include it, why is it not the best policy for specific clauses requiring this type of housing to be included in the Metro Centre Area Part II Plan?

Parkland

A recent Bureau study, Urban Open Space: Luxury or Necessity?, emphasizes that Toronto is gravely short of both local and regional parkland. This shortage is particularly severe in the downtown area. The Metro Centre area provides a great opportunity to redress rather than aggravate this unfavourable balance. The City of Toronto Official Plan Part I sets 1.4 acres per 1000 population as the local parkland requirement in residential areas. Metro Centre Developments expects some 25,000 people to live in Metro Centre.⁹ At this rate, there should be a minimum of 35 acres of local parkland. Why are only 15 acres of public parkland and 15 acres of "open space in private ownership...for...public park-like amenities satisfactory to Council" required rather than 35 acres of public parkland? What are "public park-like amenities"? - not, we trust, traffic islands or narrow strips around apartment buildings. Why is no provision made for a major regional park designed to begin to bridge the gap between Downtown and the Lake? Another major point made by the Bureau study was the great lack of open space for both downtown workers and shoppers. Metro Centre, again, offers an opportunity to provide such open space. Why is 2 (possibly 3) acres of open space in the commercial area deemed sufficient to serve the 40,000 people expected to work there?

Other questions - such as what will the total commercial floor space be? why were 2 portions of land originally included in the Metro Centre Area Part II statement, deleted from it? will the bus and airline terminals definitely occupy space in the transportation centre? - remain unanswered. But we have presented enough of the questions to make the point that there is still inadequate information about this most important development - a development that is important not only to CN and CP, but to all present and future citizens of Toronto.

⁸Regrettably, the market has proved to be remarkable inefficient in providing low- and moderate-cost family housing. If the need for family housing is not met through at least partial control of the unit mix in private developments, the shortage of such housing will escalate the demand for massive public investment in family housing - the costs of which must be borne by taxpayers throughout the Province.

⁹Donald S. Anderson, Canadian Club Address, November 22, 1971, op.cit., p.12.