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An Analysis of Cultural Heritage Conservation by Heritage Conservation Districts in Toronto's Central Business District

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Abstract

Central business districts are one of the primary points where a city's development and preservation of its cultural heritage clash. The challenges faced in preserving the historic fabric of cities shaped by the stress of rapid growth and development have led to practices such as total preservation, adaptive reuse, and a controversial approach, such as facadism. This study examines the conservation of cultural heritage in Toronto's central business district, the provincial capital of Ontario, utilizing the Ontario Heritage Act, municipal policies, and the heritage inventory. A detailed examination of the structures within the designated area revealed a variety of approaches to preserving the city's rich cultural and architectural heritage.

Keywords: *Heritage conservation, heritage conservation district, central business district, Toronto, facadism.*

Toronto Merkezi İş Alanında Koruma Bölgelerine Göre Kültürel Mirasın Korunmasının İncelenmesi

Öz

Metropoliten şehirlerin odak noktalarından biri olan merkezi iş alanları kentlerin en yoğun noktalarını oluşturmaktadır. Kentin tarihi gelişiminde oldukça önemli bir noktada yer alan merkezi iş alanları günümüzde birçok miras yapısına da ev sahipliği yapmaktadır. Gelişen ve değişen modern ihtiyaçlara karşılık vermekte zorlanabilen miras yapıları için günümüzde tam koruma, adaptif yeniden kullanım ve cephecilik gibi tartışmalı birçok alternatif koruma yöntemine başvurulabilmektedir. Bu çalışmada, Kanada'nın Ontario eyaletine bağlı olan Toronto şehrinin merkezi iş alanında yer alan miras yapıları, kentte ve eyalette uygulanan miras koruma yasalarının ışığında incelenecektir.

Anahtar kelimeler: *Miras koruma, miras koruma bölgesi, merkezi iş alanı, Toronto, cephecilik.*

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1. Introduction

The preservation of cultural heritage in rapidly changing metropolitan cities has become increasingly more of a process that is influenced by a variety of variables that interact in a more or less interdependent way. The conservation of historic buildings, which can be incapable of satisfying modern requirements, including access, responding to development stressors, and responding to capacity issues, and their passing down to the next generation make up a major and continuing topic of discussion.

Urban landscape changes have the potential to affect how urban dwellers understand their city and the sense of belongingness that they fell to it; furthermore, the reuse or redefinition of old structures can be perceived by the local population as their disrespect to the historic fabric (Kyriazi, 2019). The further lack of a common agreement on the preservation of architectural heritage may also lead to confusion and complexity of the organizational procedure and the practical process (Baturayoğlu Yöney, 2016).

Contemporary planning agendas, framed around smart, green, and sustainable cities, generally seek to accommodate growing urban populations within existing built-up areas rather than through outward expansion. As Allen et al. (2018), Forsyth (2018), and Melia et al. (2011) indicated; densification refers to a strategy of managing growth inside a bounded territory, favoring more compact and vertically intensified urban forms over lateral sprawl (Daub, 2022). Such policies are typically operationalized through quantitative thresholds for population, housing, or employment, which in practice concentrate high-density development in locations with strong infrastructure and accessibility, notably central business districts (CBDs) (Daub, 2022; Filion et al., 2010; Grant, 2017; Grant & Bohdanow, 2008).

Neoliberal urban political economy is inextricably linked with densification and smart growth where the market-based expansive growth is more likely to expel larger public deliberation (Daub, 2022; Sager, 2011; Steger & Roy, 2021). Through the lenses of the growth machine thesis, the coalitions of actors, municipalities in pursuit of the expansion of their tax-base, developers, landowners, and real-estate capital directly benefit with further expansion, impacting the decisions about urban form (Knaap & Talen, 2005; Logan & Molotch, 1987; Molotch, 1976). The allocation of developable land and additional density of the land is in the hands of the government officials who become in effect, brokers of urban land and directs the private investment by zoning and entitlement decisions (Feiock, 2002; Feiock et al., 2009; Lubell et al., 2005). In this regime, the stratified historic landscape of CBDs gains special importance: in older buildings, due to their specificty of material properties and the social representations that have developed over time, it forms a strong source of symbolic and spatial capital, which becomes easily converted into a commodity of prestige in a new project (Logan & Molotch, 1987; Ross, 2017). Meanwhile, heritage environments can be destroyed by the development of permissive plans around heritage sites, frequently on the pretext of pursuing cultural tourism and city-building, as Holdsworth (1980) remarked in his observation that heritage is business, but business usually prevails over conservation, particularly in growing-up downtowns.

On the contrary, urban heritage conservation is better understood as an ongoing negotiation of change than as a static effort to freeze places in time. The Burra Charter defines the primary objective of conservation as sustaining the cultural significance of a place, encompassing its aesthetic, historical, social, and spiritual dimensions, rather than preserving fabric for its own sake (Australia ICOMOS, 2013; Jokilehto, 1999). Heritage practices thus focus on those elements of the built environment that communities deem to embody particular values, but a value-based perspective also recognizes that different actors perceive and prioritize these values in divergent ways, making assessment and decision- making inherently contentious (Blake, 2000; Fredheim & Khalaf, 2016; Janssen et al., 2017; Mason, 2002).

In high-pressure CBDs, heritage professionals, designers, planners, communities, and market actors frequently disagree not only on which buildings merit protection, but also on what forms of intervention are legitimate, from minimal conservation and repair to reconstruction, adaptation and

more invasive forms of transformation like facadism (Australia ICOMOS, 2013; Daub, 2022; Kalman & Letourneau, 2021).

Recent approaches (2020-2025) have further radicalized this value-based perspective, shifting the focus from the preservation of material fabric to issues of spatial justice and intangible cultural heritage. As high-density development reshapes Toronto, critics argue that traditional conservation tools often fail to protect the sense of place of marginalized communities. In the literature, there are studies claiming that denying heritage protection status to Toronto's Little Jamaica district could lead to the erasure of the neighborhood's black history (Sabeta, 2024) or that local shopping streets in the West Queen West neighborhood should be recognized as production points of intangible heritage (Wang, 2024). These studies argue that the protection of cultural heritage in a region should not be limited to just architectural values but also have a political aspect.

Adaptive reuse, the most widely accepted practice in literature and among residents, involves preserving as many important sections and functions of the building as possible while repurposing it for a new function. This is considered as a relatively sensitive strategy that can extend the lifespan of historic buildings (Bullen & Love, 2011; de la Torre & Mason, 2002; Remøy & Van der Voordt, 2007). In contrast, in facade-based applications, only one or a few facades of the building are preserved, while the remaining central mass is completely demolished and replaced. This is interpreted as a superficial and taxidermic approach to cultural heritage conservation (Dushkina, 2008; Highfield, 1991; Kyriazi, 2019; Rodwell, 2008; Schumacher, 2010). Complete demolition, on the other hand, is rarely considered as a conservation strategy in literature. Demolition, the most radical and irreversible method, is being legitimized through economic gains in places like central business districts, where development pressures are high, and land is of high value.

Overall, decisions about cultural heritage in central business districts are shaped by the intersection of densification and smart growth policies, value regimes that determine what is considered worth preserving, and the physical characteristics of the historic building stock itself (Daub, 2022; Khirfan, 2010). It is within this nexus that this article situates its examination of heritage conservation in downtown Toronto.

1.1. Cultural Heritage Preservation in Canada

A complex system of government, encompassing federal, provincial, and municipal levels, protects Canada's cultural heritage. Since the 1960s, when pressures for redevelopment and urbanization have grown, Toronto, Montreal, and Vancouver, the country's three largest cities, have come up with different legal and institutional ways to protect their historic buildings. People in Toronto were terribly upset about the possibility of tearing down Old City Hall in the 1960s. This led to a process that raised awareness of heritage issues in Ontario and eventually led to the passage of the Ontario Heritage Act (OHA).

In the late 1960s, highway projects planned for Vancouver sparked significant public opposition because they would damage historic structures. This led the British Columbia government to designate the endangered Gastown and Chinatown neighborhoods as "historic areas" in 1971 (Donald Luxton & Associates Inc., 2017). The demolition of the Van Horne Mansion in Montreal in 1973 was perceived as a threat to other historic structures in the city. This led to the emergence of the "Save Montreal" movement, which ultimately led to the passage of Quebec's Cultural Heritage Act in 1975. These examples from Vancouver and Montreal demonstrate that heritage protection regimes in significant cities are shaped by local and civil society initiatives, which often face the threat of demolition and damage to cultural heritage.

However, binding conservation authority at the structure level has largely been devolved to local governments through the provinces. The federal government highlights the national significance of selected structures and areas by designating them as National Historic Sites. However, these designations do not directly create legal protection on their own; they acquire their meaning through additional planning and conservation tools at the provincial or municipal levels. Indeed, while areas such as the Hotel Vancouver or Gastown are recognized as National Historic Sites, the actual impact of

this status depends on the conservation decisions made by the relevant provinces and municipalities (Vancouver Heritage Foundation, 2018).

There is no comprehensive "historic monuments law" at the federal level; limited regulations for specific groups of assets, such as historic railway stations or lighthouses, and policy-level guidance is provided through the 2003 Standards and Guidelines for the Protection of Historic Places document and inventory systems such as the Canadian Register of Historic Places. Structures deemed of national significance are only recommended as "places of national significance" or monuments after being assessed in terms of their historical, architectural, and cultural value by the Historic Sites and Monuments Board of Canada (HSMBC). In the event of a favorable decision by the board, the site in question is designated within the framework of the Historic Sites and Monuments Act and gains symbolic status (Historic Sites and Monuments Act, R.S.C., 1985). This process, carried out through examinations and evaluations at every level, determines the threshold at which a building is worthy of preservation, considering not only its form but also its position in the city's memory.

1.1.1. Protection of cultural heritage at the federal level

One of the leading actors in the federal (national) protection of Canada's cultural heritage is Parks Canada, established in 1911. As a federal agency, Parks Canada is responsible not only for the preservation of the parks mentioned in its name but also for the management of historic sites of national importance. In addition to ensuring the protection of historic parks and sites across the country, Parks Canada also provides professional and managerial support to advisory boards and review offices such as the Historic Sites and Monuments Board of Canada (HSMBC) and the Federal Heritage Buildings Review Office (FHBRO) (Parks Canada, 2023). Parks Canada categorizes its designations as follows (Parks Canada, 2023): national historic sites, national historic events, national historic figures, heritage railway stations, federal heritage buildings, and heritage lighthouses.

Established in 1919 as an informal advisory board, the HSMBC gained legal status with the Historic Sites and Monuments Act of 1953. In 1930, the program nearly came to a complete standstill, as the National Parks Act, passed that same year, failed to provide the clear and specific definition of authority that the board and its members had long hoped for. As a result, the unit struggled to even erect a symbolic number of commemorative plaques, and the future of conservation efforts became uncertain (Taylor, 1990).

While this stagnation was partially remedied by the appointment of a newly emerging generation of professional historians to board, certain problems still persisted. For example, the province of Quebec was inadequately represented from its inception until the 1930s. Similarly, even though the heritage movement focused on the preservation of historic architecture, this crucial component was not represented on board. This situation resulted in no work being carried out in this area, even though the parks department had access to employment and aid funds during the crisis. While there was provincial-level support for the preservation of historic buildings in Ontario, Quebec, Nova Scotia, and British Columbia, federal structures were criticized by the heritage community due to factors such as stagnation, jurisdictional uncertainties, and representation problems (Taylor, 1990).

The passage of the Historic Sites and Monuments Act in 1953 allowed for the appointment of a member from each province to the HSMBC. Furthermore, new functions, particularly concerning the maintenance of historic buildings and the designation of national historic sites based on architectural merit, were added to the program in conjunction with the Public Archives of Ontario (Taylor, 1990). If the Board approves a structure and confirms its national significance, it is designated as a historic site under the Historic Sites and Monuments Act of 1985. In 1989, the HSMBC's mandate expanded to include historic railway stations, the burial sites of Canadian prime ministers a decade later, and lighthouses in 2009. Composed of representatives from each province and territory, the Board currently prioritizes topics such as Indigenous history, diversity, and Canadian and world history, which often lack sufficient representation (Parks Canada, 2025). This can be seen as an indicator of the evolving and transforming cultural understanding in Canada.

In Canada, alongside official government bodies, various non-governmental organizations and charities are involved in the preservation of cultural heritage nationwide. Foremost among these is the National Trust for Canada (formerly the Heritage Canada Foundation), established in 1973 (National Trust for Canada, n.d.). The Trust has played a significant role in preserving Canadian cultural heritage through programs such as Main Street Canada, which revitalizes main streets in small towns (LeBlanc, 2011), and projects like Heritage Regions (National Trust for Canada, 2013).

In Canada, the preservation of cultural heritage at the building scale is largely the responsibility of local governments. The official adoption of The Standards & Guidelines for the Conservation of Historic Places in Canada by the federal government in 2003 marked a significant step towards standardizing conservation principles nationwide. Updated in 2010, the guidelines discuss decision-making processes for the conservation of historic places; conservation practices such as full conservation, rehabilitation, and restoration; standards for the conservation of historic places; and guidelines to be followed for the conservation of historic places. The guidelines, which define a value-based approach (aesthetic, historical, scientific, cultural, social, or spiritual significance, or great importance to past, present, and future generations), define the decision-making process in three main steps: initial diagnosis/treatment determination, review, and follow-up to the guidelines. Defining conservation as extending the lifespan of a historic structure or place without damaging its defining characteristics, the guidelines consider conservation practices as conservation, rehabilitation, restoration, and/or combinations thereof. Reconstruction (for partially or completely lost buildings) is not considered a conservation method (Canada's Historic Places, 2010).

1.1.2. Protection of cultural heritage at the provincial level

The legal framework protecting cultural heritage at the building level in Toronto is established under the jurisdiction of the Province of Ontario, and the Ontario Heritage Act (1990) is the primary basis for such protection. Although the Act describes different procedures for publicly and privately owned structures, it basically entrusts the responsibility of preservation to municipal decision-making and regulatory mechanisms, especially for those that are privately owned. Designation of a structure for conservation is a process initiated at the local level, involving a series of administrative, technical, and political steps. The local government units, heritage committees, or civil society organizations first identify the historical potential or cultural value of a particular structure. These actors conduct preliminary assessments and evaluations that document the architectural features of the structure and its relationship to the historical context and the urban fabric as per the Ontario Heritage Act, 1990. If, as a result of such technical and expert-based evaluation, the structure is found worthy of being preserved, a public "intention to designate" notice is issued, which gives the right to object to the property owner and relevant stakeholders. The building gets officially protected after the evaluation of objections, as the city council adopts a by-law approving the designation, and the provisions of the Ontario Heritage Act become directly applicable to the property.

The two most important sections of the Act, in the Toronto context, are Parts IV and V. Part IV deals with individual designate; the city council can designate a property it believes has cultural heritage value or interest (Ontario Heritage Act, 1990). In this respect, the municipality should provide the property owner with a written notice, explaining why the municipality believes the property has heritage value, describing the property in a manner that readily identifies it, specifying the possibility of objection, and outlining restrictions on demolition or removal. Once a property has been designated, the owner cannot demolish or remove it without proper authorization. An intention to demolish it must be notified to the municipality at least 60 days in advance, and the necessary permit is required. Similarly, any alteration to a listed property that may affect its heritage attribute needs the written permission of the city council. This consent is a filter designed to protect those character-defining elements, which include the facade, materials, and architectural details (Ontario Heritage Act, 1990). During the process, the Act gives municipalities a role not only as a supervisor but also as a supporter: the municipal council may make a grant or loan to the property owner to defray, in whole or part, the cost of the work carried out on a listed property (Ontario Heritage Act 1990).

The Ontario Heritage Act institutionalizes consultative and expert mechanisms to ensure that the designation process is not confined to the municipal council. In this regard, a municipality can establish a municipal heritage committee to advise the council on matters related to Parts IV and V, and to provide technical input into the council's decisions. It must be composed of at least five members appointed by the municipal council (Ontario Heritage Act, 1990). Where a municipality has a heritage committee, consultation with it becomes mandatory before any intention to designate a property is announced.

In Ontario, to prevent delays in the intention and registration process under the Ontario Heritage Act and to accelerate regional transformation, Bill 23 – More Homes Built Faster Act, passed in 2022, introduced a two-year limitation for listed properties that had not yet received official registration. Properties that did not receive official registration within two years were removed from the list and prevented from re-entering for five years. This aimed to eliminate long-standing uncertainty by removing listed properties. While the aim was to eliminate uncertainty surrounding listed properties and contribute positively to regional development, this placed additional pressure on municipalities and drew criticism due to potential heritage losses for properties that could not be designated within the two-year period.

1.1.3. Protection of cultural heritage at the municipal level

Toronto, whose skyline has been shaped by public buildings, commercial structures, and residences constructed since the mid-19th century, encompasses urbanization on varying scales. With the development of the country and the city of Toronto, particularly in the city center, high-rise offices, commercial buildings, and large public buildings have begun to be constructed, shaping the city's cultural heritage. Due to the rapid development and transformation, the city has undergone the need to preserve its cultural heritage aims to ensure the sustainability of the city's memory. In many metropolitan cities such as London, Paris, and New York, numerous preservation methods have been developed to prevent the destruction of architectural heritage. For example, in the United States, the National Historic Preservation Act of 1966 allows property owners to obtain preservation status for their buildings if they believe they are of national importance and worthy of preservation. However, although it may seem easy on paper, gathering the necessary information (such as the building's architectural style, importance, and history) can be quite difficult and burdensome for property owners (Page, 2016).

At the municipal level, experts within the Heritage Preservation Services unit of Toronto City Planning maintain an inventory of structures with heritage value, conduct assessments, and plan preservation strategies. The Toronto Preservation Board, appointed by the City of Toronto, is an advisory board. This board provides opinions to the City Council on proposed designation and permitting matters. The final decision-making body is the Toronto City Council. The Council decides on the designation of individual structures, the declaration of conservation areas, and permit applications (such as alterations or demolition) for heritage structures. While there is a central heritage board instead of 25 borough councils in Toronto, opinions are sought from relevant district councils or planning committees before Council decisions are made. In addition, civil society organizations (such as the Toronto branch of the Architectural Conservancy of Ontario, ACOTO) and local history societies contribute to the processes by making applications for the preservation of specific structures or raising public awareness. The Toronto Preservation Board is an advisory body composed of seven citizens appointed by the City Council, the Chair of the Community Preservation Panel, and a City Council member. During the assessment, the architectural features, historical context, and regional/urban contribution of the building are examined. In this process, the building is first added to the Municipal Heritage Register as a "listed" structure. Although a listed building does not yet have full designation status, it is the first step towards its preservation. After the building is marked as listed, the full designation phase begins, initiating the "intention to designate" process mentioned above (Ontario Heritage Act, 1990).

The process of inclusion in the protection program is not limited solely to the decision of public authorities; the participation of property owners and civil society is also important. In addition to the

protection of a building, important issues such as planned changes or demolition by the property owner can also be discussed with the local community. The designation status regulations include many details, from the number of people attending the session to the concerns and questions that residents may raise with the property owner or project developers.

1.2. Heritage Conservation Districts of Toronto

One of the City of Toronto's methods for protecting cultural heritage is to preserve the appearance of a neighborhood, in addition to protecting individual structures. Part V of the Ontario Heritage Act grants local governments the authority to safeguard districts of cultural heritage value. The City of Toronto has 22 primary heritage conservation districts (HCD): Blythwood Road, Cabbagetown North, Cabbagetown Southwest, Draper Street, East Annex, Fort York, Garden District, Harbord Village, Historic Yonge Street, King-Spadina, Kingswood Road South, Lyall Avenue, West Annex Phase 1: Madison Avenue, Parkdale Main Street, Queen Street West, Riverdale, Rosedale, St. Lawrence Neighborhood, Teiaiagon- Baby Point, Union Station, Weston Phase 1, Wychwood Park, and Yorkville–Hazelton can be seen in Figure 1. Some conservation districts consist of several parts, such as Rosedale, which includes Rosedale North and Rosedale South, and Cabbagetown, which comprises North, Northwest, Metcalfe, and South. The 2024 Toronto Official Plan outlines over 100 potential new heritage conservation districts, including the Financial District.

In Toronto, all parcels within an HCD, except the building's interior, are protected under the Ontario Heritage Act; therefore, the HCD Plan establishes a framework for managing change across the entire parcel, not just the facades perceived from the street. HCDs are based on a holistic conservation approach that addresses the spatial character, fabric, and heritage values of the entire area, as well as interventions at the individual building scale (City of Toronto, n.d-a).

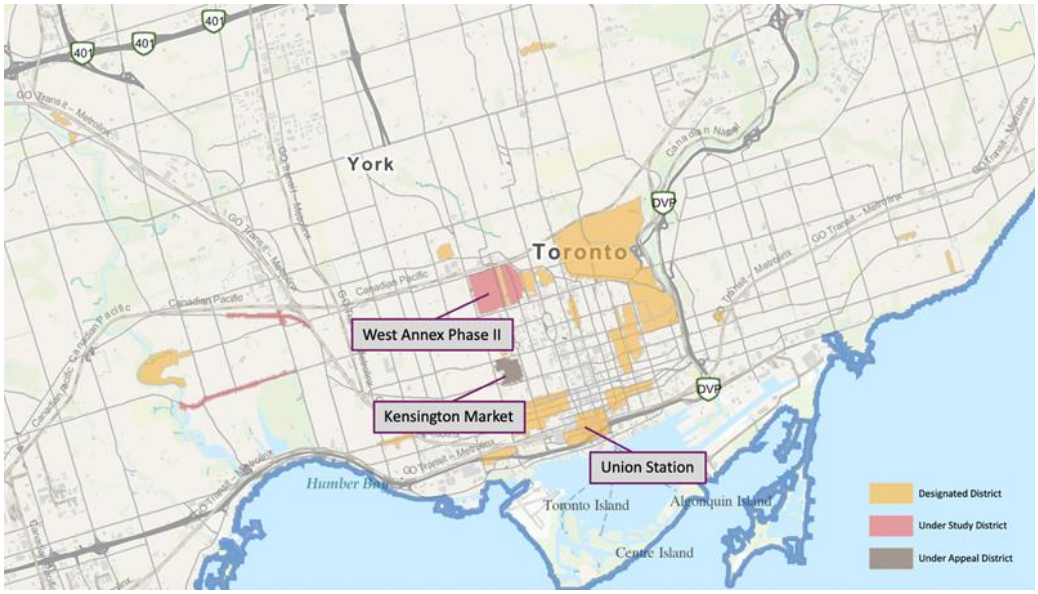


Figure 1. Heritage conservation districts of Toronto (City of Toronto, n.d.-b; adapted by the authors)

The HCDs in Toronto have been scaled to a broad variety of morphologies, including suburban single-family residential neighborhoods like Wychwood Park and Weston, residential fabric of the 19th century including Cabbagetown, urban commercial axes, e.g. Queen Street West, and mixed-use downtown areas. The HCD policies in Toronto are aimed to meet the requirements of Part V of the Ontario Heritage Act that were established by the 2005 amendments (City of Toronto, n.d.).

According to Toronto Official Plan, the designation of heritage resources located within a certain areas as a Heritage Conservation Districts and creating conservation and design guidelines to be used in the areas are considered as the major means of preserving significant heritage resources. The HCD Plans in Toronto are all founded on the usual conservation criterion that is defined by the Standards and Guidelines of the Conservation of Historic Places in Canada document as approved by the City Council. During the research and planning process, the Ontario Heritage Toolkit: Heritage Conservation District

and Heritage Property Evaluation, which is authored by the Ontario Ministry of Culture is considered the necessary source of reference to the research and evaluation stages (City of Toronto, n.d.).

In Toronto, the HCD process begins with a community-initiated nomination. A detailed HCD study is conducted for the nominated area. An HCD Plan is then prepared, and this plan is enacted by the City Council by law. The final decision regarding the declaration of an HCD rests with the Toronto City Council under the OHA; neighborhood polling, as used in previous years, merely provides information to policymakers and does not replace the criteria used to determine whether an area has cultural heritage value (City of Toronto, n.d.).

HCD plans use two parcel-based categories: contributing and non-contributing properties. A concise statement of contribution is prepared for each contributing property, explaining how the property contributes to the area's character. For non-contributing properties, design guidelines are prepared that detail parametric considerations such as scale, massing, height, materials, facade proportions, and relationship to the street, guiding harmonious and distinctive new development (City of Toronto, n.d.).

The Union Station Heritage Conservation District, bounded by Wellington to the north, Yonge to the east, Lake Shore/Harbor to the south, and Rees Streets to the west, incorporates a diverse range of periods and styles, including Union Station and the Toronto Club, visible in Figure 2. The section of Front Street between York and Yonge has been described as one of the most extensive and most complete Beaux-Arts streetscapes in the country, with Union Station and the Dominion Public Building, opposite the Royal York Hotel and Royal Bank Plaza, creating a cohesive monumentality (City of Toronto, 2006).



a b

Figure 2. Buildings in the Union Station Heritage Conservation District: a) Union Station, b) Toronto Club (Şen, 2025)

Figure 3 presents selected examples from the heritage building inventory, illustrating the chronological and architectural diversity of the study area. Toronto's CBD is home to many different heritage buildings dating from the 19th to the 20th century, ranging from Art Deco to Gothic styles.



a b c d e

Figure 3. Selected heritage building examples from Toronto's CBD a) Argyle Hotel (1865), b) Confederation Life Building (1892), c) Trader's Bank Building (1905), d) Commerce Court North (1931), e) Canada Trust Building (1968) (Şen, 2025)

The Union Station Heritage Conservation District Plan outlines conservation and design requirements in such a way that the focus no longer lies on the facade of individual building but the entire urban environment. Preservation of the original materials and architectural features of historic buildings is the main recommendation of the plan which undertakes restoration, where it can. In case of critical interventions, it suggests that a reconstruction process should be followed founded on photographic and physical evidence. It also underscores the fact that new entrants must feature a modern language of design and not create pastiche of the past. It has to be contextually suitable in terms of scale, its mass, proportion and materials (City of Toronto, 2006).

As stated above, there are two types of buildings in the district: contributing and non-contributing. Contributing structure demolitions are only authorized under extraordinary conditions and through the rigorous guidelines of the Ontario Heritage Act and a looser framework is determined around compatible infill and facade redevelopment of non-contributing lots (City of Toronto, 2006). The new development guidelines especially focus on the visual and spatial connection that will exist with the Union Station, the continuity of the skyline and the street sections in the HCD, and its role as a transitional building between the financial district and the waterfront of the city (City of Toronto, 2006).

The public realm principles designate elements such as the viewing corridor leading to the Royal York Hotel, the square in front of the station, rail moats, and Roundhouse Park as heritage properties, setting goals for high design quality, the use of durable materials, accessibility, and a reduced density of urban amenities. In practice, with the declaration of the HCD, all parcels in the area are included in Part V; heritage permits are evaluated based on the HCD Plan, the Official Plan, the provincial policy statement at the state level, and national conservation standards. Minor alteration exceptions are defined for minor repairs and invisible interventions, and a sizable portion of decision-making authority for approved applications is delegated to expert staff on behalf of the City Council. In this respect, the Union Station HCD Plan offers an example of an advanced conservation regime that balances heritage preservation with the flexibility required for high-density urban renewal through a normative framework and an integration of administrative tools (City of Toronto, 2006).

2. Materials and Methods

This study is a case study examining the conservation status and current spatial condition of cultural heritage buildings in the central business district of Toronto, Ontario, Canada. To this end, the boundaries of the study area were first delineated, and then the area was divided into blocks. Following this, the heritage buildings within the area were numbered according to their order within the blocks. For the numbered heritage buildings, a combination of document analysis, official database searches, field observation, photographic documentation, and spatial mapping was used.

Toronto's central business district is one of the urban areas where intensification policies, development pressure, and heritage conservation concerns intersect most visibly. Daub (2022) demonstrates that intensification policies in downtown Toronto shape heritage conservation practices and redevelopment pressures. In this context, the central business district, which defines a narrower area than the concept of the downtown examined by Daub (2022), was chosen. For the purposes of this study, the CBD core was operationalized through the boundaries of Toronto’s Financial District as defined in official planning documents. In the city's official planning documents, the boundaries of the financial district are drawn by Queen Street West to the north, Yonge Street to the east, Front Street to the south, and University Avenue to the west (City of Toronto, 2024). In this study, the northern boundary was extended beyond Queen Street West to include adjacent civic, institutional, and financial heritage buildings, such as Toronto City Hall, Osgoode Hall, and major historic bank buildings.

In this context, the need to create a map of the area arose. For this purpose, the City of Toronto (2015) 3D Massing dataset, which provides a 3D map of the city, was first converted into a 2D version. The 3D Massing dataset was not used to determine heritage value or conservation status; rather, it provided the spatial base for mapping, numbering, and later interpretation of the current height of the associated building mass in selected heritage properties. The boundaries of the study were drawn in

the 2D area map (Figure 4a), and this area was divided into 12 blocks, as can be seen in Figure 4b. The heritage buildings within each block were numbered individually, starting from Union Station.

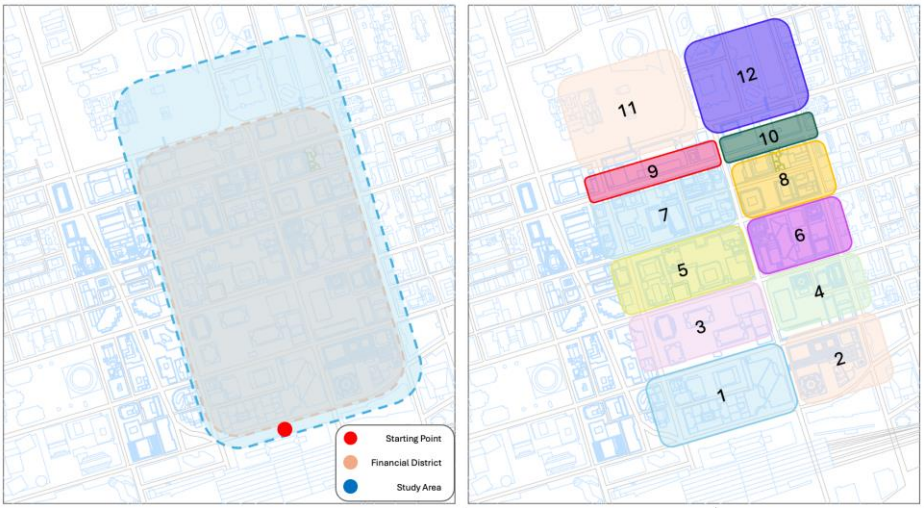


Figure 4. Borders of a) Study area and b) analytical blocks (Created by the authors using City of Toronto (2015))

After the base map and block system were prepared, the Heritage Properties layer of Toronto Maps, the City of Toronto's official open-access mapping service, was used to identify the heritage buildings located within the study area. This layer provided basic information such as heritage property names, addresses, heritage statuses, and relevant City Council by-law references. In this context, each heritage property, starting from Union Station, was numbered as shown in Figure 5. Properties without an identified heritage status in the official heritage datasets were excluded, and the final inventory was limited to 71 heritage properties.

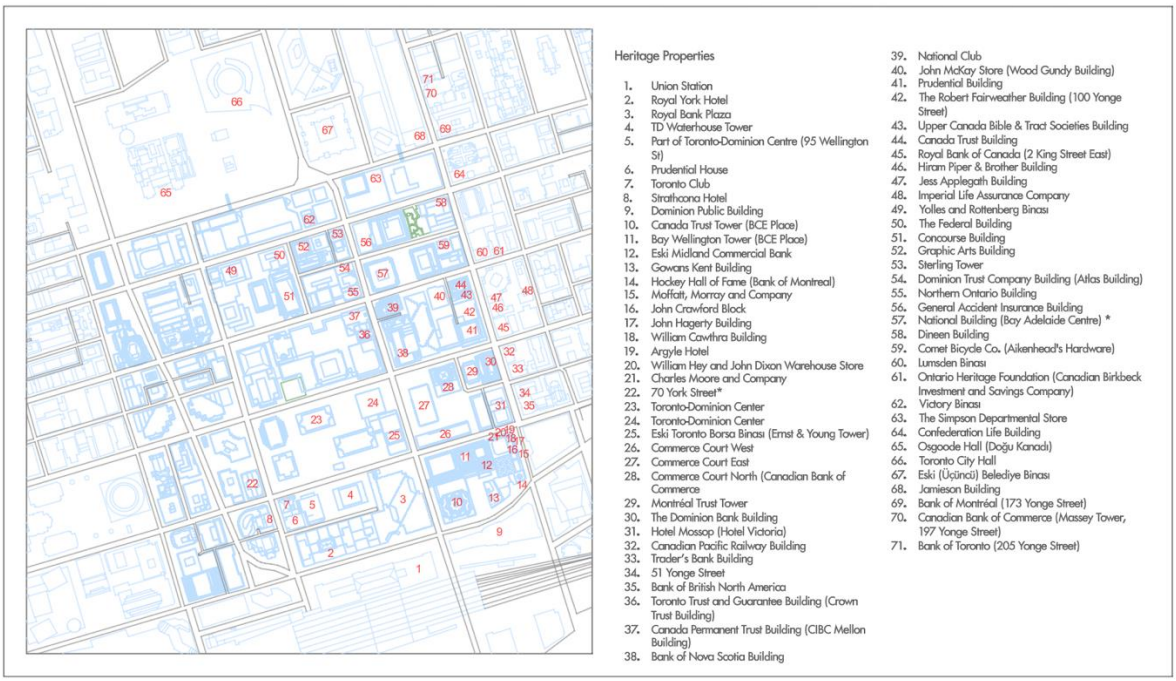


Figure 5. Numbered inventory map of heritage properties examined in the study area (Created by the authors using City of Toronto, 2015; City of Toronto, n.d.-b)

Following the identification and numbering of heritage properties in the area, the Toronto Heritage Property Search database, which allows for detailed address-based searches, was used to access detailed information on each heritage property using address information obtained from Toronto Maps. Since the level of detail available in this database varies by property, relevant municipal by-laws were also reviewed to verify legal conservation status, including designation under Part IV of OHA (Ontario Heritage Act), inclusion within a Part V Heritage Conservation District, or listing on the

municipal heritage register. By-laws from the 2000s onwards generally contain more detailed information about heritage properties, whereas earlier by-laws, particularly those from 1970s, were found to provide more limited property-specific information. Additional information on buildings designated as National Historic Sites and of federal importance was also obtained from the Parks Canada Directory of Federal Heritage Designations. In this context, field observations were conducted and properties were photographed to gather information that could not be obtained from official databases, by-laws, or federal heritage agency websites. This allowed the cultural heritage in the area to gain a visible and tangible dimension, while information such as the materials used on the façade and architectural style, which are not mentioned in official sources like by-laws, was collected through observation. However, the examinations of cultural heritage properties were limited to the exterior; observations and detailed examinations of the interior were not conducted. The methodological steps, selection and filtering criteria, main data sources, and analytical uses are summarized in Table 1.

Table 1. Methodological steps, selection criteria, and analytical use in the study

Methodological Component	Selection / Filtering Criterion	Main Source	Analytical Use
Study area delimitation	The CBD core was operationalized through the Financial District boundary. The northern boundary was extended to include adjacent civic, institutional, and financial heritage buildings contributing to the CBD heritage profile.	City of Toronto (2024)	Definition of the operational study boundary
Base map and spatial framework	The 3D Massing dataset was used as a spatial base for mapping, block division, numbering, and associated mass-height interpretation. It was not used to determine heritage value or legal conservation status.	City of Toronto 3D Massing Dataset (2015)	2D base map; AutoCAD-based drawing, and numbered inventory map
Initial heritage property identification	Heritage properties located within the defined study area were identified through official heritage mapping layers; properties without an identified heritage status were excluded from the final inventory.	Toronto Maps (City of Toronto (n.d.-b))	Initial candidate heritage property list
Property-level verification	Each identified property was checked through address-based heritage records and legal documents.	Toronto Heritage Property Search; municipal by-laws; Heritage Conservation District plans; Parks Canada	Verified conservation status, designation / listing data, heritage attributes, and National Historic Site information
Supplementary and field verification	Missing or inconsistent information was cross-checked through contextual sources, on-site observation, and photographic documentation.	ACOTO; archival / contextual sources; field observation; photographic documentation	Verification of façade material, architectural style, visible alterations, and evidence of façadism
Inventory construction and interpretation	Verified data were compiled into a single inventory and interpreted through descriptive and qualitative analysis.	Integrated inventory dataset	Maps, descriptive charts, façade-retention patterns, and conservation interpretation

The inventory variables, their purposes of data collection, and the sources used for each variable are summarized in Table 2.

Table 2. Inventory variables and data sources used for the assessment of heritage buildings in Toronto's CBD

Inventory Variable	Purpose of Data Collection	Source
Conservation Status	To identify the cultural heritage profile of the study area and to determine the legal protection status of each heritage property.	Toronto Maps; Toronto Heritage Property Search; Parks Canada Directory of Federal Heritage Designations
Façadism	To identify whether the original building fabric has been substantially retained or whether conservation has been reduced primarily to the retention of one or more historic façades, thereby revealing the extent of façade-based conservation practices in Toronto's CBD.	Municipal by-laws; ACOTO; field observation and photographic documentation
Construction Year	To identify the historical layers of the cultural heritage profile of the area and to determine which periods are represented in the heritage building stock.	Toronto Heritage Property Search; Municipal by-laws; ACOTO
Architectural Style	To understand the architectural diversity of the heritage buildings in the study area.	Municipal by-laws; ACOTO; field observation
Exterior Façade Material	To evaluate the material characteristics of the heritage buildings in relation to architectural style, heritage diversity, and the visual character of the urban fabric.	Municipal by-laws; field observation
Function / Building Type	To understand the functional profile of buildings in the CBD and to trace the transformation of the area through buildings that have undergone functional change or adaptive reuse.	Toronto Heritage Property Search; Municipal by-laws; ACOTO
Current Height of the Associated Building Mass	To support the interpretation of façadism cases by identifying the height of the current building mass associated with retained historic fabric, rather than the original height of the historic façade itself.	3D Massing Dataset (City of Toronto, 2015); Critchley (n.d.)

The qualitative assessment was limited to the externally visible architectural and urban characteristics of the heritage buildings. Interior spaces, structural authenticity, and user-based evaluations were outside the scope of the analysis. Field observations and photographic documentation were used to examine façade integrity, visible material characteristics, architectural style, the legibility of original historic fabric, and the relationship between retained historic fabric and the current associated building mass. The concept of façadism was used as an analytical lens to examine whether heritage conservation in the CBD was realized through whole-building preservation or reduced primarily to façade retention under redevelopment pressure. These qualitative observations were not used as a numerical scoring system. They supported the interpretation of the heritage inventory and the visible intervention patterns identified in the study area.

Several measures were taken to improve the reliability of the inventory and to clarify the limitations of the data. Official heritage databases were used as the primary starting point for identifying heritage properties in the study area. However, the inclusion of a heritage property in a register does not necessarily indicate the extent to which its physical integrity has been preserved. For this reason, database information was cross-checked with municipal by-laws, Heritage Conservation District plans, field observations, photographic documentation, and ACOTO materials. Gaps in earlier municipal decisions, particularly those dating from the 1970s and 1980s, were addressed through field observations and photographic documentation where possible. Since the study focuses on the CBD scale, the assessment was limited to externally observable architectural and urban characteristics. Accordingly, the inventory and descriptive graphics should be interpreted as tools for identifying spatial distribution, conservation status, and visible intervention patterns of heritage buildings, rather than as a comprehensive technical assessment of conservation quality.

The overall methodological process, from study area delimitation to inventory creation and interpretation, is summarized in Figure 6. Through this process, the final inventory was used not only as a list of individual heritage buildings, but also as a analytical tool for examining how conservation status, façade retention, function, and urban development pressure intersect within Toronto's CBD.

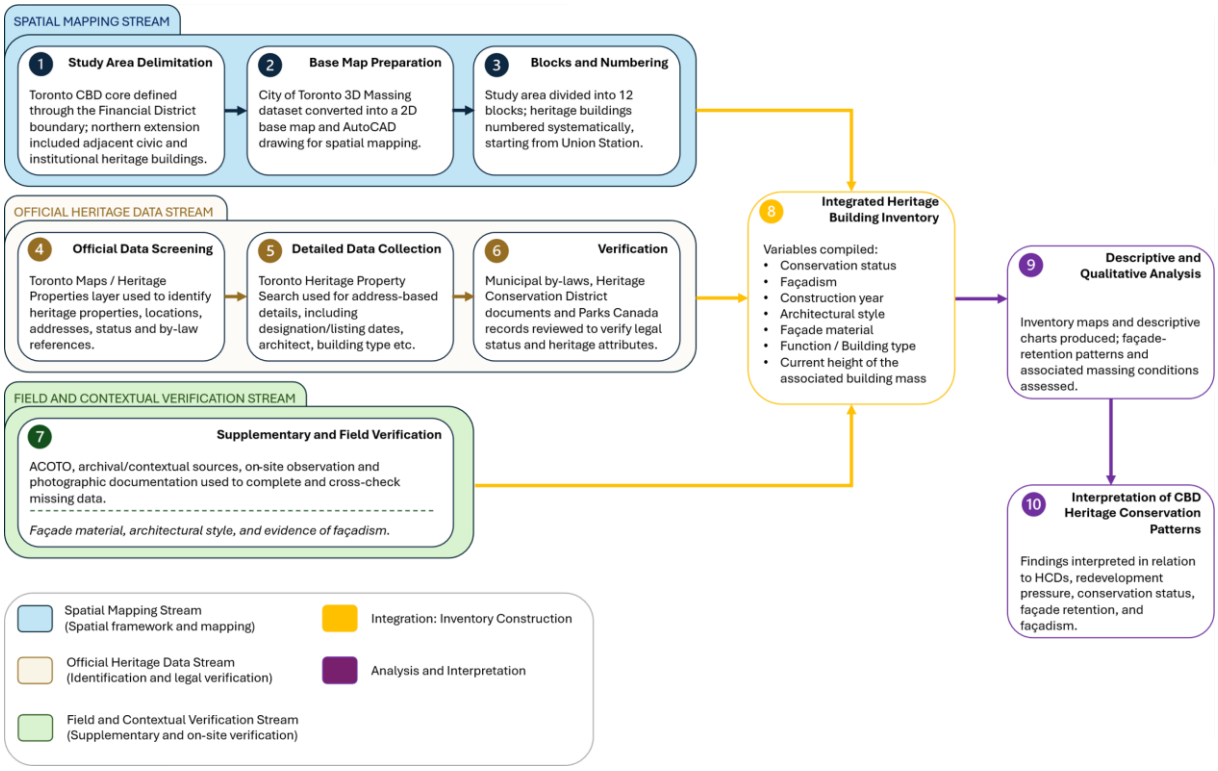


Figure 6. Methodological workflow of data collection, verification, inventory construction, and analysis (Created by the authors)

3. Findings and Discussion

Following the methodological process described above, the final inventory included 71 heritage properties located within or directly facing the defined study boundary of Toronto's CBD. Among these properties, 42 are individually designated under Part IV of the Ontario Heritage Act, 9 are protected through inclusion within the Union Station Heritage Conservation District under Part V, and 12 are protected under both individual designation and USHCD status. In addition, 8 properties are listed on the municipal heritage register but have not yet received formal designation. This distribution indicates that individual designation remains the dominant protection mechanism within the study area, while the USHCD represents the main area-based conservation framework. Figure 7a also indicates that four properties are associated with National Historic Site designations.

It is evident that 8 listed properties are in a very vulnerable position due to Bill 23, and that the necessary conservation decisions for the CBD's heritage properties should be taken urgently. This situation can also be understood through the prevalence of façadism in the region. As it can be seen in Figure 7b, the historical façades of 11 of the protected buildings are being preserved. This highlights how retained historic façades may be incorporated into redevelopment projects under the high-density conditions of Toronto's CBD.

As can be seen in Figure 7c, the oldest structures protected under cultural heritage date from the 1800-1850 period, while the newest date from the 1956-1990 period. The chronological intervals were structured to reflect major historical and urban development phases affecting the CBD, including 19th century commercial expansion and 20th century institutional, financial, and modernist redevelopment.



Figure 7. Heritage conservation status and inventory characteristics within Toronto's CBD: a) conservation status, b) façade-retention patterns, c) construction period (Created by the authors using City of Toronto, 2015; City of Toronto, n.d.-b)

Figure 8a (prepared with the help of City of Toronto (2015) and Critchley's (n.d.) Toronto Building Height) presents the current associated building mass height of the heritage properties included in the inventory. This figure should not be interpreted as a complete height profile of Toronto's CBD. In cases of façade retention or façadism, the mapped height may correspond to the current redevelopment mass associated with the retained historic façade rather than to the original historic building itself. The figure therefore functions as a supplementary spatial indicator for interpreting the relationship between retained heritage fabric and redevelopment-related massing conditions. Figure 8b shows that the heritage buildings in the area have many different architectural styles. This reveals the historical development and architectural richness of Toronto's central business district. Finally, as can be seen and expected in Figure 8c, a significant portion of the buildings in the study area are for commercial and financial use.

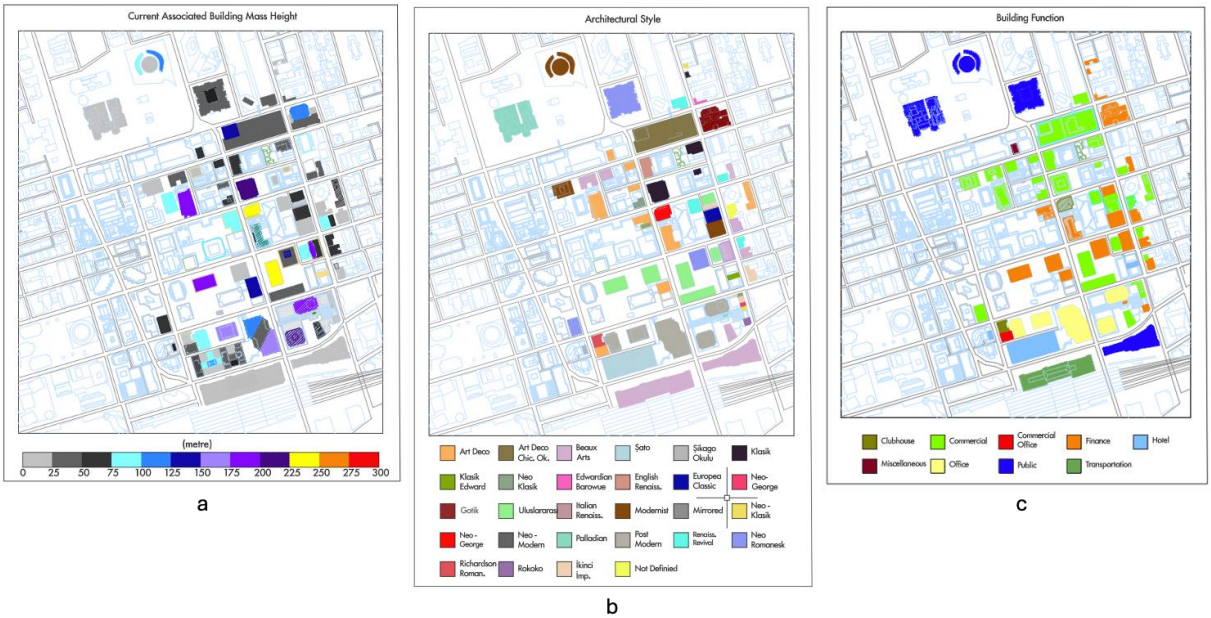


Figure 8. Selected inventory characteristics of heritage properties within Toronto's CBD: a) current associated building mass height, b) architectural style, c) building function (Created by the authors using City of Toronto, 2015; City of Toronto, n.d.-b; Critchley, n.d.)

The transformation of the area can be seen in Figure 9. As can be seen from the visualization prepared by taking into account the construction years of the visible buildings and the current Yonge Street

cross-section from the 3D Massing Dataset obtained from the City of Toronto (2015), the city skyline has expanded horizontally to meet current needs and demands.

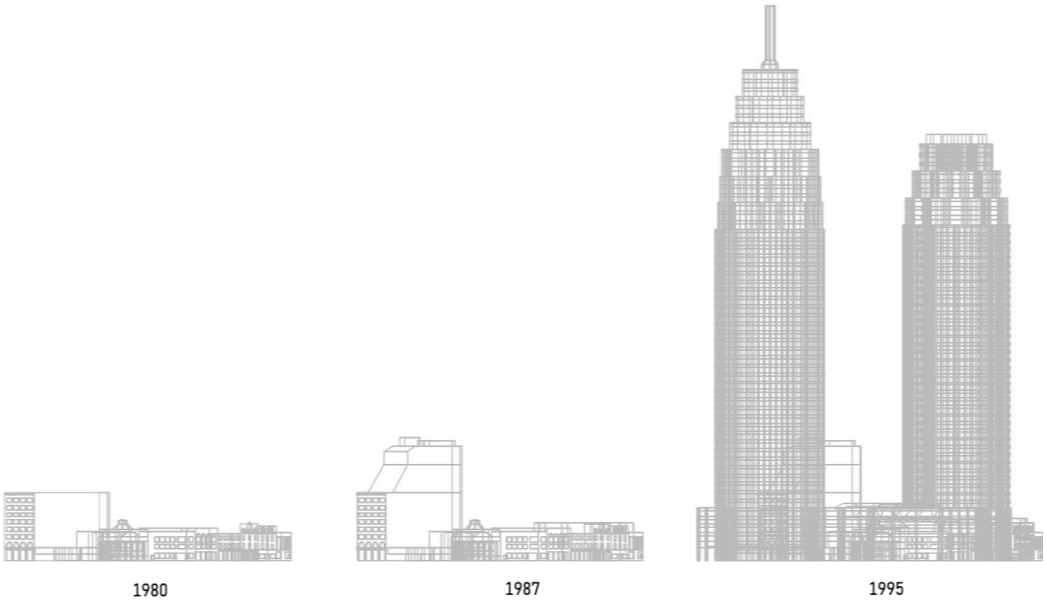


Figure 9. Section-based visualization of selected building masses along Yonge Street using construction year and current massing data (Created by the authors using City of Toronto (2015))

4. Conclusion and Suggestions

This paper discusses the condition of heritage buildings in Toronto's central business district (CBD). Findings indicate that the densification and development imbalances experienced in the region have considerably changed the skyline of the city between the past and the present. The Ontario Heritage Act provides the main legal framework through which architectural and cultural heritage values are recognized and protected in Toronto's CBD.

The analysis of the Toronto example provides valuable information about conservation issues of the central business districts as an urban typology. The fact that of the study area, the predominance of individual Part IV designations over Part V area-based protection reflects a conservation regime that continues to operate primarily at the individual-property scale. The nature of central business districts as continuous urban complex of towers, podiums and street facades is not always compatible with this approach which is parcel-based and influenced by the policies of densification observed across the entire city. Thus, conservation policies in Toronto's CBD and other Canadian metropolitan centers may need to be revisited, with greater emphasis placed on area-based tools capable of addressing cumulative urban change. Toronto CBD, in this regard, shows that to protect heritage in central business districts effectively, it is necessary to define not only buildings but also the district, street, and skyline of a city. In this context, the City of Toronto's plans, dated December 2024, to declare the Financial District a conservation district are of considerable importance.

Facadism prevalence that has been driven by the pressure of transformation in the region can be regarded as a trade-off between developmental interests and city's cultural heritage. But the ubiquitous system of safeguarding the architectural shell of the colonial and modern city, whether the existing instruments can be modified to safeguard the intangible, social, and various histories that comprise the living vitality of the urban core remains to be determined. An effective conservation plan should be robust enough to combine both physical retention and policies that allow the further existence of the various communities and functions with which these structures are meaningful.

The central business districts of other metropolitan cities in Canada can be studied comparatively in future to identify whether the situation is an exception in Toronto. It would be not only beneficial to include other North American and European metropolitan cities in the research but also help achieve a global agreement and shared position regarding the topic of preservation of historical heritage.

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All authors contributed equally to the article. There is no conflict of interest.

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