

Staff Report



Development Services Department

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REPORT TO: Heritage Kitchener

DATE OF MEETING: April 7, 2026

SUBMITTED BY: Garrett Stevenson, Director of Development and Housing Approvals, 519-783-8922

PREPARED BY: Victoria Grohn, Heritage Planner, 519-783-8912

WARD(S) INVOLVED: Ward 10

DATE OF REPORT: March 12, 2026

REPORT NO.: DSD-2026-129

SUBJECT: Notice of Intention to Designate 1254 Union Street under Part IV of the Ontario Heritage Act

RECOMMENDATION:

That pursuant to Section 29 of the Ontario Heritage Act, the Clerk be directed to publish a Notice of Intention to Designate the property municipally addressed as 1254 Union Street as being of cultural heritage value or interest.

REPORT HIGHLIGHTS:

- The purpose of this report is to request that Council direct the Clerk to publish a Notice of Intention to Designate the property municipally addressed as 1254 Union Street under Part IV of the Ontario Heritage Act.
- The key finding of this report is that property municipally addressed as 1254 Union Street, in particular the portions of the original warehouse building and former machine shop, meets the criteria for designation under Ontario Regulation 9/06 (amended by Ontario Regulation 569/22) and has been confirmed to be a significant cultural heritage resource. This property is recognized for its design/physical, historical/associative, and contextual values.
- There are no financial implications with this recommendation.
- Community engagement included informing residents by posting this report with the agenda in advance of the Heritage Kitchener committee meeting, providing written correspondence to the property owner, and consulting with Heritage Kitchener. In addition, should Council choose to give notice of its intention to designate, such notice will be served to the Owner and the Ontario Heritage Trust.
- This report supports the delivery of core services.

BACKGROUND:

1254 Union Street includes a two-storey warehouse building, two single storey buildings to the east, a temporary structure to the southeast and various landscape components situated on a 5.65 acres of land located on the south side of Union Street just before Union Street turns into Sereda Road (Fig. 1). The subject property is located in the Northward Planning Community in the City of Kitchener within the Region of Waterloo.



Figure 1. Location Map – 1254 Union Street

A site plan application for the subject property was submitted in 2023, and a Scoped Heritage Impact Assessment (HIA) was required as part of the application. The HIA was presented to Heritage Kitchener at its August 1, 2023, meeting. The site plan application proposed the construction of a storage facility on the subject property, and the HIA concluded that there were no identified adverse impacts on the cultural heritage value of the property as a result of this proposal. The heritage evaluation of the subject property included within the HIA concluded that the property only meets one (1) out of nine (9) criteria under Ontario Regulation 9/06. However, staff have a differing opinion, concluding that the property meets five (5) out of nine (9) criteria, and warrants designation under Part IV of the Ontario Heritage Act.

During the site plan review process, Heritage Planning staff proposed that the designation of the property be made a condition of final site plan approval. However, with no mechanism under the *Planning Act* or the *Ontario Heritage Act* to enforce this, Heritage Planning staff communicated to the applicant that designation could occur later in the site plan process, so as not to hold up approvals. At the time, Heritage Planning staff requested acknowledgement from the property owner that the City would be pursuing designation of the property following the complete construction of the maintenance facility,

however no such acknowledgement was received. The construction of the maintenance facility has since been complete and staff are now pursuing designation.

A Notice of Intention to Designate (NOID) was to be considered by the Heritage Kitchener committee at its February 7, 2026 meeting. However, Heritage Planning staff put forward a motion to defer the item for one meeting cycle to allow for further discussion with the property owner/their heritage consultant. The item was deferred for an additional meeting cycle at the March 3, 2026 meeting to continue these discussions.

The heritage consultant representing the owner reviewed the Statement of Significance that was prepared by Heritage Planning staff and has proposed a revised list of heritage attributes (see letter included as **Appendix B** to this report) based on their evaluation of the property. Heritage Planning staff's response to this letter is discussed in the following section of this report.

Per standard procedure, should Council support the Notice of Intention to Designate, Owners will be contacted through a Notice of Intention to Designate (NOID) Letter. An ad for the NOID will also be published in a newspaper. Once the letter is served and the ad posted, there will be a 30-day appeal period in which Owners could object to the designation.

REPORT:

Identifying and protecting cultural heritage resources within the City of Kitchener is an important part of planning for the future, and helping to guide change while conserving the buildings, structures, and landscapes that give the City of Kitchener its unique identity. The City plays a critical role in the conservation of cultural heritage resources. The designation of property under the *Ontario Heritage Act* is the main tool to provide long-term protection of cultural heritage resources for future generations. Designation recognizes the importance of a property to the local community; protects the property's cultural heritage value; encourages good stewardship and conservation; and promotes knowledge and understanding about the property. Designation not only publicly recognizes and promotes awareness, but it also provides a process for ensuring that changes to a property are appropriately managed and that these changes respect the property's cultural heritage value and interest.



Figure 2. Front and Side Elevation of original former Warehouse Building.

1254 Union Street is recognized for its design/physical, significant historical/associative, and contextual values (Fig. 2). It satisfies five (5) of the nine (9) criteria for designation under Ontario Regulation 9/06 (amended by Ontario Regulation 569/22). A summary of the criteria that is met or not met is provided in the table below. Even though the property as a whole was evaluated against O. Reg 9/06 and there have been many alterations since these building were first constructed, specific portions of the buildings were identified by staff as having cultural heritage interest of value:

- The main original 1902 former warehouse building, along with the wings on the warehouse building (1904-1923) portion; and
- Former machine shop (1902).

Criteria	Criteria Met (Yes/No)
1. The property has design value or physical value because it is a rare, unique, representative or early example of a style, type, material, or construction method.	Yes
2. The property has design value or physical value because it displays a high degree of craftsmanship or artistic merit.	No

3. The property has design or physical value because it demonstrates a high degree of technical or scientific achievement.	No
4. The property has historical value or associative value because it has direct associations with a theme, event, belief, person, activity, organization or institution that is significant to a community.	Yes
5. The property has historical or associative value because it yields, or has the potential to yield, information that contributes to an understanding of a community or culture.	Yes
6. The property has historical value or associative value because it demonstrates or reflects the work or ideas of an architect, artist, builder, designer or theorist who is significant to a community.	Yes
7. The property has contextual value because it is important in defining, maintaining or supporting the character of an area.	No
8. The property has contextual value because it is physically, functionally, visually, or historically linked to its surroundings.	Yes
9. The property has contextual value because it is a landmark.	No

Heritage Planning staff’s previous report from February 2026, including a summary of the design/physical, historical/associative, and contextual values of the property is included as Attachment A to this report. Based on discussions with the owner’s heritage consultant, some modifications to the list of heritage attributes are proposed. This is discussed further in the following subsections of this report. The design/physical, historical/associative, and contextual values as described in Heritage Planning staff’s original report remain largely unchanged, save and except for greater clarification around the later additions to the building.

Consultant Review and Updated List of Attributes

On behalf of the current property owner, a letter from MHBC Planning dated February 13, 2026 (included as Attachment B to this report) provides an opinion on the heritage attributes that were identified in the Statement of Significance prepared by Heritage Planning staff. MHBC Planning proposes that the list of heritage attributes be updated to only pertain to the original portions of the 1902 warehouse building, including the original single-storey wing additions. Reference to the 2005 additions, including the front entrance portico and portico on the west elevation, are recommended to be removed as well as reference to the entire north elevation of the warehouse building. MHBC Planning also recommends that any reference to the contextual value of the property be removed from the list of attributes. Below is an excerpt of the main points from the letter prepared by MHBC Planning, along with Heritage Planning staff response in *italics*:

- The main factory building has undergone considerable changes since it was constructed c. 1902, and some of these alterations are a) contemporary, and not of cultural heritage value or interest, and/or b) are not complementary to the building and detract from its heritage value.



Figure 3: Aerial image of overlay with construction dates (source: HIA, MHBC Planning, 2023)

- *Heritage Planning staff acknowledge that there have been several alterations made to the original 1902 warehouse, with some made as recently as the early 2000s and 2010s to accommodate the conversion of the former warehouse building into an event venue (see Figure 3 above). While some alterations to this property are a testament to a former use of the property (the Hacienda Sarria), it is the opinion of Heritage Planning staff that these changes create a false sense of historical development and are not considered to be an expression of their time. These alterations do not reflect the evolution of the warehouse building, but rather their construction takes inspiration from an architectural style uncommon in Kitchener and from the personal experience of a former owner which is unrelated to the building's history or its previous uses. As such, it is recommended that the front entrance portico on the south elevation, the addition on the east elevation, and the portico on the west elevation be removed from the list of attributes for this property.*
- The entire front (south) façade of the c. 1902 warehouse building has been reconstructed;
 - *Further to Heritage Planning staff's comment above, reference to the portico addition is recommended to be removed from the list of heritage attributes, however any remaining original attributes that are still visible on this facade will continue to be included.*
- All features of the existing front entrance (south elevation) portico are not original to the structure and was constructed c. 2005 and is not of heritage value;
 - *Reference to the portico addition is recommended to be removed from the list of heritage attributes.*

- The east elevation includes an addition constructed c. 2005, and is not of heritage value;
 - *The east elevation continues to be captured as a heritage attribute of this property through reference to the roof details, brick construction, and window/door descriptions. The addition on the east elevation is not referenced in the list of heritage attributes.*

- The west elevation includes an addition constructed c. 2005, and is not of heritage value;
 - *The west elevation continues to be captured as a heritage attribute of this property through reference to the roof details, brick construction, and window/door details. Reference to the exterior archways have been removed.*

- The majority of the main portion of the building has been reconstructed, resulting in considerable repairs/replacements to masonry. This includes the addition of a variety of different colours of bricks (including red bricks), which are not original. Note that the “wings” included both red and yellow/buff bricks, which are likely original;
 - *Reference to red bricks on the main warehouse building has been removed.*

- The entire rear (north) elevation is not visible from the public realm, and we suggest that it is not identified as a heritage attribute; and
 - *Even though this elevation is not visible from the public realm, original features of the building are still visible from other areas on the property. Any future additions to this portion of the property would need to be reviewed to ensure compatibility and to mitigate any potential adverse impacts. Heritage Planning staff do not agree that reference to this elevation should be removed from the list of heritage attributes.*

- The contextual attributes are not justified, given the existing character of the area.
 - *Heritage Planning staff do not agree with the conclusion made by MHBC Planning that the contextual attributes are not justified, nor do staff agree with the recommendation that reference to these attributes be removed. While Heritage Planning staff do acknowledge, and agree, that the surrounding context has changed and the visual context may be lost, the property is still physically, functionally, and historically linked to its surroundings given that the buildings are still in their original locations and that this site was selected for very specific purposes, given proximity to both the Grand River and the rail line. It is Heritage Planning staff’s opinion that reference to the contextual attributes of the property remain.*

Updated List of Heritage Attributes

Based on Heritage Planning staff’s review of the letter prepared by MHBC Planning, and further to the comments noted by Heritage Planning staff in the previous report section, it is recommended that the list of heritage attributes for the property municipally addressed as 1254 Union Street read as follows:

The heritage attributes of 1254 Union Street reside in the following attributes:

- All elements related to the construction of the main original warehouse building (c. 1902), along with the wings on the warehouse building (c. 1904-1923) including:
 - The location, massing, and scale of the original portions of the c. 1902 former warehouse building, including original features of the single storey wing additions (1904-1923);
 - The style and appearance of the main hip roof of the c. 1902 portion of the building;
 - Flat and shed rooflines on the wings of the original warehouse building;
 - Yellow brick construction including decorative stepped masonry details and brick pilasters between bays on all facades;
 - Segmentally arched original window openings with brick voussoirs;
 - Original arched window openings;
 - Segmentally arched original door openings with brick voussoirs at the south, east, and west elevations.
- All elements of the original portion of the former machine shop (1902) (excluding later additions) including:
 - The location, massing, and scale of the former machine shop;
 - Yellow and red brick construction;
 - The style and appearance of the hip roof;
 - Original arched window openings with brick voussoirs; and
 - Original arched door openings with brick voussoirs.
- All elements related to the contextual value of the buildings including:
 - The original location of the original former warehouse and former machine shop on the subject property.

This list of heritage attributes, along with the design/physical, historical/associative, and contextual value of the property is outlined in the updated Statement of Significance included as Attachment C to this report.

STRATEGIC PLAN ALIGNMENT:

This report supports the delivery of core services.

FINANCIAL IMPLICATIONS:

Capital Budget – The recommendation has no impact on the Capital Budget.

Operating Budget – The recommendation has no impact on the Operating Budget.

COMMUNITY ENGAGEMENT:

INFORM – This report has been posted to the City's website with the agenda in advance of the Heritage Kitchener committee meeting.

CONSULT – Heritage Planning staff have consulted with the Heritage Kitchener committee regarding designation under the *Ontario Heritage Act*. Heritage Planning staff have consulted with the property owner's heritage consultant.

Section 29(2) of the *Ontario Heritage Act* requires Council to consult with the Municipal Heritage Committee (Heritage Kitchener) before giving notice of its intention to designate a property. Heritage Kitchener will be consulted via circulation and consideration of this report (see INFORM above). Members of the community will be informed via circulation of this report to Heritage Kitchener and via formal consideration by Council. In addition, should Council choose to give notice of its intention to designate, such notice will be served on the property owner and the Ontario Heritage Trust, and published in the local newspaper (The Record). Once notice has been served, the owner has the right of appeal to the Ontario Land Tribunal. It should be noted that should Council decide not to proceed with a Notice of Intention to Designate, that the building will remain on the City's Municipal Heritage Register until January 1, 2027, after which it will be removed according to the changes enacted by Bill 23. Once removed, it cannot re-listed on the Register again for five (5) years, i.e. January 1, 2032.

PREVIOUS REPORTS/AUTHORITIES:

- [DSD-2026-046 – Notice of Intention to Designate 1254 Union Street](#)
- Draft Scoped Heritage Impact Assessment – 1254 Union Street
- *Ontario Heritage Act, 2022*

REVIEWED BY: Sandro Bassanese, Manager of Site Plan

APPROVED BY: Justin Readman, General Manager, Development Services Department

ATTACHMENTS:

- Attachment A – DSD-2026-046 – Notice of Intention to Designate 1254 Union Street – February 3 Heritage Kitchener Meeting Report
- Attachment B – Letter from MHBC Planning, dated February 13, 2026
- Attachment C – Updated Statement of Significance for 1254 Union Street
- Attachment D – Scoped Heritage Impact Assessment – 1254 Union Street