



February 13 2026

Victoria Grohn
City of Kitchener
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Dear Victoria

RE: Response to Designation of 1254 Union Street, Kitchener ON under Part IV of the Ontario Heritage Act
OUR FILE: 15183 C

MHBC has been retained by the owner of the property located at 1254 Union Street, Kitchener (the **"subject property"**) as it relates to the proposed designation of the subject property under Part IV of the *Ontario Heritage Act*. The purpose of this letter is to **a) notify the City of the owner's formal objection** to the proposed designation, and **b) provide information** which further demonstrates that the list of heritage attributes identified by City staff should be revised. A copy of our requested revisions to the list of heritage attributes is provided as Appendix A.

Please note that MHBC previously completed a Heritage Impact Assessment for the subject property in 2023 in support of the construction of a new warehouse building at the rear of the lot, which has since been constructed. The response to the proposed designation provided in this letter draws from information provided in this Heritage Impact Assessment, the City of Kitchener staff report to the Heritage Advisory Committee (February 3, 2026) as well as an additional site visit conducted by MHBC staff on February 9, 2026.

Review of Heritage Attributes

The reasons for the objection of the owner are, in part, related to the proposed list of heritage attributes noted in a staff report to the Heritage Advisory Committee dated February 3, 2026. We are of the opinion that the draft list of heritage attributes for the subject property includes features which are not original, or have cultural heritage value.

The Heritage Impact Assessment provides a detailed analysis of the existing features of the building and confirms the following:

- 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.

- The entire front (south) façade of the c. 1902 warehouse building has been reconstructed;
- 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;
- The east elevation includes an addition constructed c. 2005, and is not of heritage value;
- The west elevation includes an addition constructed c. 2005, and is not of heritage value;
- 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;
- 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
- The contextual attributes are not justified, given the existing character of the area.

Figure 1 demonstrates that the west elevation two storey addition is contemporary. This image also demonstrates that the existing two storey portico at the front elevation is not original.



Figures 1 & 2: (left) View of construction of addition to west elevation, as well as a portion of the front elevation two storey portico (c. 2005) (right) View of existing west elevation (MHBC 2026) noting contemporary additions.

Figure 3 demonstrates that the entire front elevation of the original portion of the c. 1902 warehouse building has been reconstructed.



Figures 3 & 4: (left) View of front (south) elevation of warehouse building prior to the c. 2005 alterations, (right) View of existing front elevation noting portion of building which is a contemporary addition (two storey portico) (MHBC, 2026).

Figure 5 identifies the location, scale and massing of the two storey contemporary addition at the east elevation.

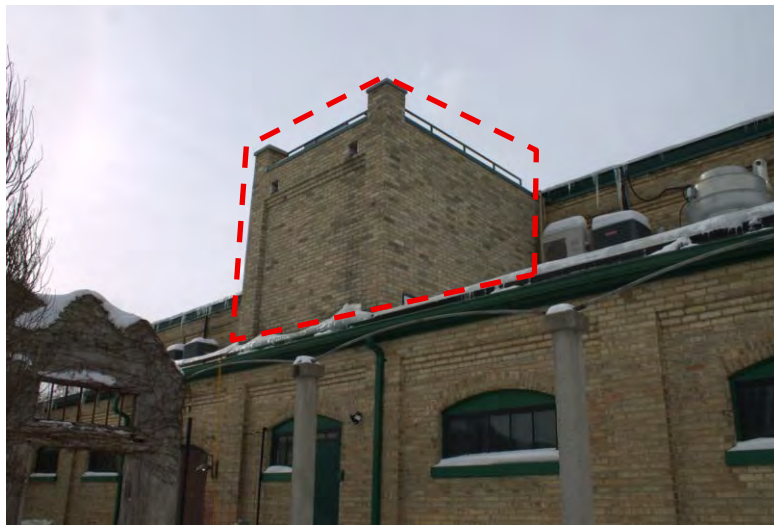


Figure 5: View of east elevation noting contemporary addition (MHBC, 2026).

Figures 6 & 7 demonstrate that the original portion of the building (c. 1902) was likely constructed with yellow/buff brick, and not red brick. Existing red bricks are masonry repairs and/or replacements. The original portion of the wings at the east and west elevations were likely constructed with both yellow/buff and red bricks.



Figures 6 & 7: (left) View of north and west elevation of main factory building noting masonry repairs with red brick (right) View of "wing" addition noting original yellow/buff and red bricks throughout (MHBC, 2026).

Please also note that we have conducted an analysis of the surrounding context in the HIA (2023). We are of the opinion that the property does not demonstrate contextual value and does not contribute to the character of Union Street. The existing character of Union Street (and Sereda Road) is primarily contemporary industrial warehouse developments and associated surface parking and accessory structures. Further, the subject property is not visible from the Grand River, and the Grand River is not visible from the subject property given a) distance, b) existing vegetation, and c) contemporary new buildings and infrastructure, including the highway which separates the property from the Grand River. Therefore, the contextual attribute related to the streetscape should be removed from any designation By-law.



Figures 8 & 9: (left) View of 1254 Union Street (approximate location noted with red arrow) looking north-west from Sereda Road, (MHBC, 2026) (right) View of surrounding context, looking north-west towards industrial developments from Union Street near 1254 Union Street (MHBC, 2026)

Conclusions and Recommendations

Based on the information provided in this letter as well as the Heritage Impact Assessment (MHBC, 2023), we are of the opinion that the list of heritage attributes identified by City staff should be revised. Please see Appendix A of this letter which provides an updated list of heritage attributes for consideration by the City.

Thank you for considering our input on behalf of the property owner. Should you have questions or **wish to discuss our comments in more detail, we would be happy to meet with you and/or the City's** consultants. We understand that the City intends to bring a recommendation to the Heritage Advisory Committee in March.

Yours truly,

MHBC

A handwritten signature in black ink, appearing to read "Vanessa Hicks". The signature is fluid and cursive, with a large initial "V".

Vanessa Hicks, MA, CAHP
Associate, MHBC

cc. Jason Kropf, Moser
cc. Dan Currie, MHBC

Appendix A – Revised List of Heritage Attributes

Heritage Attributes

The heritage attributes of 1254 Union Street reside in the following attributes: Elements related to the exterior of the original portion of the main original 1902 vernacular industrial former warehouse building (c.1902) portion, along with the wings on the warehouse building (c. 1904-1923):

- 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 of the wings on the original portion of the warehouse at the east and west elevations;
- Yellow brick construction including decorative stepped masonry details, and brick pilasters between bays on the south, east and west facades ;
- Segmentally arched original window openings with brick voussoirs at the south, east, and west elevations;
- Original arched window openings at the south, east, and west elevations; and
- Segmentally arched original door openings with brick voussoirs at the south, east, and west elevations.

Elements of the original portion of the former machine shop (1902) (excluding later additions):

- 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.