

ONTARIO LAND TRIBUNAL

PROCEEDING COMMENCED UNDER subsection 17(40) of the Planning Act, R.S.O. 1990, c. P. 13, as amended

Appellant/Applicant: 30 Duke Street Limited
 Subject: Failure of Approval Authority to announce a decision respecting a Proposed Official Plan Amendment
 Municipality: City of Kitchener
 Reference No.: OPA 20/005/W/JVW
 Legacy Case No.: PL210104
 OLT Lead Case No.: OLT-22-002377
 Date of Hearing: April 22, 2025
 OLT Case Name: 30 Duke Street Limited v. Kitchener (City)

PROCEEDING COMMENCED UNDER subsection 34(11) of the Planning Act, R.S.O. 1990, c. P. 13, as amended

Appellant/Applicant: 30 Duke Street Limited
 Subject: Failure of Approval Authority to announce a decision respecting a Zoning By-law Amendment
 Municipality: City of Kitchener
 Reference No.: ZBA 20/013/W/JVW
 Legacy Case No.: PL210104
 OLT Lead Case No.: OLT-22-002377
 Date of Hearing: April 22, 2025
 OLT Case Name: 30 Duke Street Limited v. Kitchener (City)

PROCEEDING COMMENCED UNDER subsection 42(6) of the Ontario Heritage Act, R.S.O. 1990, c. P. 13, as amended

Appellant/Applicant: 30 Duke Street Limited
 Subject: Failure of Approval Authority to announce a decision respecting a Zoning By-law Amendment
 Municipality: City of Kitchener
 Reference No.: HPA-2022-V-015
 OLT Lead Case No.: OLT-22-002377
 Date of Hearing: April 22, 2025
 OLT Case Name: 30 Duke Street Limited v. Kitchener (City)

REPLY WITNESS STATEMENT OF DEEKSHA CHOUDHRY, MSc., BES

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Reply:

1. The following is a reply to the Witness Statement of Dan Currie, dated February 26, 2025, regarding the Appeals of the Official Plan Amendment and Zoning By-law Amendment applications for 22 Weber Street West.
2. I have prepared this Reply Witness Statement to assist the Tribunal and provide clarification, where it is needed. Each time I refer to a specific paragraph in Mr. Currie's Witness Statement, I have italicized the font to distinguish it from my own paragraphs.

Applicable Sections

3. In paragraph 41, Mr. Currie states that "*The CCNHCD Plan identifies four sub-areas: a) Victoria Street, b) Weber Street, c) Ellen Street East, and d) Margaret Avenue. The Subject Property is located within the Weber Street sub-area. Therefore, there are site-specific policies and guidelines which apply to the Subject Property within the Weber Street area that are different than the policies and guidelines that apply to properties in the rest of the CCNHCD.*"
4. In my opinion, other sections of the HCD Plan apply which have not been included in Mr. Currie's Witness Statement. These sections include sections 3.1, and 3.2, which include the Goals and Objectives, and Principles of the HCD Plan. These sections are important to consider as they lay the foundations and the intent of the HCD Plan and inform the policies and guidelines meant to guide change within the HCD. I include the relevant goals and objectives in Paragraph 32 of my Witness Statement.

5. In paragraph 39, Mr. Currie states that *“The CCNCHD Plan provides both policies and guidelines. While not defined in any glossary or section of the CCNHCD Plan, a policy is typically understood to mean a rule which must be adhered to, whereas a guideline is a course of action which is encouraged.”*

6. Section 3.3.5.2 of the HCD Plan lists policies for any development on Weber Street, and Policy 3.3.5.2. (f) states that *“Design guidelines provided in Section 6.9.2 (this should be 6.9.4, this is a typo in the Plan) will be used to review and evaluate proposals for major alterations, additions or new buildings to ensure that new development is compatible with the adjacent context.”* Section 3.3 of the HCD Plan states that *“Guidelines to further illustrate the intent of the policies are also provided in Sections 6,7, and 8 of this Plan”*.

7. It is reasonable to interpret that these guidelines intend to ensure that the purpose of the policies are met, that these guidelines be used to evaluate proposals for new development, and that they should be adhered to as well, not just encouraged or used only when convenient. It is my opinion that the design guidelines included in Section 6.9.4 should be given the same weight as the other policies regarding new development on Weber Street when evaluating any new development within the HCD.

Conclusions of the HIA based on previous development concept

8. In paragraph 51, Mr. Currie states that *“The HIA concludes that the Proposed Development is consistent with the applicable Development Pattern and Land Use policies in section 3.3.1 because:*
 - *the low density areas of the CCNCHD at the interior of the District will remain unchanged.*
 - *The front yard setbacks along Weber Street are highly variable and the proposed setback of the Proposed Development is compatible with those along Weber Street.”*

9. I disagree with the conclusions of the HIA regarding this. Section 3.3.1 of the HCD Plan states *“ The vast majority of the Civic Centre Neighborhood was originally developed as single detached residential. Despite the fact that pockets of it have since been redeveloped*

for high-density apartment buildings, or converted to office or commercial uses, it remains a neighborhood of primarily original detached housing, 2 to 2-½ storeys in height on lots of sufficiently generous size that parking and driveways are generally to the side of dwellings. Setbacks of original heritage buildings are relatively uniform at the individual street level, as are building height and scale.”

10. The intent of the HCD Plan is to ensure that the predominant low-rise residential character, land uses and development pattern of the overall HCD remains intact and consistent, not just the interior portions of the HCD as Mr. Currie’s statement or the HIA implies. Furthermore, neither the HIA nor Mr. Currie’s Witness Statement explains how the proposed 0-metre setback of the proposed development is compatible with the ‘highly variable’ setbacks of other buildings along Weber Street. It should be noted that this does not mean high-density development is not anticipated or allowed, however, any such development must demonstrate that it is compatible with and sympathetic to the existing character and context of the neighborhood, which in my opinion the proposed development has not been able to demonstrate.

11. In paragraph 38, Mr. Currie states that *“As described in Section 4.2.1 of the CCNHCD Plan, the Subject Property is located within an area identified as “High Density Commercial Residential”. The Plan notes that is an area with no height restrictions and that, given the context of Weber Street, infill development could be compatible even if taller than 4-5 storeys.”*

12. While the HCD Plan does not explicitly set height restrictions, it does include policies that are meant to guide appropriate height and transitions of any new development, and that those policies must be satisfied so that any proposed development is compatible with its immediately adjacent heritage resources, and with the HCD in general. Section 4.2.1 of the Plan explicitly states that *“Potential infill or redevelopment along Weber Street could have a negative impact on the heritage character of the area if not undertaken in a sensitive manner, particularly as this street contains nearly half of the oldest buildings in the District”*. So, while infill development could be compatible even if taller than 4-5 storeys, it is imperative that any such development be done in a sensitive manner and considers the existing context of Weber Street, which this development does not in my opinion.

13. In Paragraph 52, Mr. Currie states that *“The HIA concludes that the Proposed Development is consistent with the applicable Weber Street Area policies in section 3.3.5.2 because:*

- *The proposed building will maintain the residential streetscape character and the proposed architectural design and details are compatible with Weber Street even though the proposed building is much taller than existing building.*
- *The Proposed Development is compatible with adjacent heritage resources on the street with respect to height, massing, built form, and materials because:*
 - *The Subject Property is located in an area the CCNCHD Plan considers can accommodate tall buildings because of the existing context; and*
 - *Compatible is defined in the City OP as “land uses and building forms that are mutually tolerant and capable of existing together in harmony within an area without causing unacceptable adverse effects, adverse environmental impacts or adverse impacts. Compatibility or compatible should not be narrowly interpreted to mean the ‘same as’ or even as being ‘similar to’.” In this regard, section 6.4 of the HIA demonstrates that there will be no adverse impacts on surroundings properties. Therefore the Proposed Development is compatible with adjacent heritage resources on the street.”*

14. The HIA and Mr. Currie’s statement do not sufficiently demonstrate how the proposed building maintains the residential streetscape or what elements of the architectural design and detail make the proposed development compatible with Weber Street, even though the proposed building is much taller than existing buildings.

15. It could also be argued that the proposed compatibility of the proposed development can be questioned and not be relied upon if the policies are applied incorrectly in the HIA, such as the angular plane analysis which I elaborate on further along the statement.

16. In paragraph 53 a), Mr. Currie states that *“The proposed new building includes a large front entrance with glazing and masonry fronting Weber Street West. This front entrance has been emphasized at the pedestrian level through the use of a 2-storey podium.”*

17. I also do not agree with Mr. Currie's statement regarding how the proposed development is compatible with adjacent heritage resources on the street concerning height, massing, built form, and materials because the subject property is located in an area the CCNCHCD Plan considers can accommodate tall buildings because of the existing context. Just because the HCD Plan anticipates an area with higher density development, does not mean it should accommodate tall buildings that, in my opinion, do not meet the policies and guidelines of new development in the HCD. Furthermore, this statement implies that a proposed development automatically becomes compatible with adjacent resources on the street with respect to height, massing, built form, and materials because it is proposed in a location that is meant for its type of development. I do not agree with this statement as the HIA and Mr. Currie's statement has not sufficiently demonstrated how the proposed development is compatible with the adjacent heritage resources concerning height, massing, and built form.
18. I agree with Mr. Currie's statement that 'compatibility' and 'compatible' should not be narrowly interpreted to mean the 'same as' or even as being 'similar to'. However, a different proposed building design does not automatically make a proposed development compatible with its adjacent heritage resources and with the HCD and does not mean that there will not be any adverse impacts. As I have mentioned in my Witness Statement, it is how the architectural design and details have been applied in the proposed development as a whole in terms of its height, massing, lack of stepbacks, use of materials other than red masonry, and the proposed fenestration pattern that make this building incompatible with adjacent heritage resources and with the HCD in general.
19. It should also be noted that the definition of 'compatible', which has been taken from the OP, was included as part of the 2014 OP Review, while the HCD Plan was developed and implemented in 2007-2008. Before 2014, the OP did not include a definition for 'compatible' or 'compatibility'. So, while I agree with Mr. Currie's interpretation of 'compatible' and 'compatibility', relying solely on this definition from the OP cannot be used to demonstrate that there will be adverse impacts on surrounding properties as a result of this proposed development in my opinion.

20. The proposed development concept is the one that was included in the HIA dated 2021. However, in the latest development concepts and site plans provided by the appellants, there is no podium for the building nor any stepbacks for half of the building face along Weber Street West. Now, the proposed development does not have *any* transitions that could potentially make it sympathetic to the existing character of the HCD. The design concepts that were included in the HIA do not reflect the latest design proposals that have been submitted to the City. Furthermore, with the proposed 0-meter front yard setback, the building would further overshadow the immediately adjacent heritage resources and the Weber Street interface in general.
21. In paragraph 53 c), Mr. Currie states “*The proposed building façade includes, or could include, materials, colours, and architectural details that complement existing buildings on Weber Street. Currently, there is no consistent or cohesive design for the buildings along Weber Street. The two buildings located adjacent to the Subject Property at 18 Weber Street West and 28 Weber Street West are of the Vernacular and Second Empire architectural styles and are constructed of brick. The proposed building includes neutral shades of masonry, including red brick masonry above the podium which will reflect and complement these adjacent buildings.*”
22. Red brick masonry is only included on a portion of the whole building. Furthermore, red brick masonry in isolation does not make a new development compatible with and complimentary to adjacent buildings. As reflected in my Witness Statement, the lack of other complimentary architectural details such as design details, appropriate height, and stepbacks, make the proposed development incompatible with the overall character of the HCD, and including red masonry on the building facade is not enough to mitigate the proposed development’s incompatibility.
23. In paragraph 53 e), Mr. Currie states “*The face of the tower of the proposed building has a stepback above the podium base. This minimizes “the perception of height and shadow impacts to pedestrians on the street and provide more visual continuity” as specified in the guideline. The front entrance has been emphasized through the design of the two storey podium. In my opinion, stepbacks to address shadow impacts on Weber Street are unnecessary since the building’s location on the north side of Weber Street will not result in*

shadow impacts to pedestrians and there is no existing visual continuity on Weber Street. Therefore, the proposed building design, including the height of the building at the street, will not add nor detract from the current lack of visual continuity.”

24. I do not agree with this statement. While the proposed height might not result in shadow impacts to pedestrians, it will impact the perception of height and thus, the visual continuity of Weber Street. As I have mentioned in my Witness Statement, the existing buildings on this portion of Weber Street are similar in height to themselves, none of these buildings are similar in height to a 19-storey building. In my opinion, in the absence of stepbacks to address transitions, or to lessen the perception of height, the current proposed height of the development will detract from the visual continuity and the existing cohesive streetscape.
25. In paragraph 121, Mr. Currie states *“In response to Items 1 and 3, the proposed new building is consistent with the policies and meets the intent of the guidelines of the CCNHCD Plan, which outlines how new buildings will respect scale, setbacks, stepbacks, proportions, visual relationships, and materials. Given that topography is not identified as a heritage attribute of the CCNHCD Plan, no policies or guidelines are provided for the conservation of any landforms. The proposed front and rear yard setbacks are consistent with the varied setbacks along Weber Street West and are appropriate for the context. The proportions of the building are consistent with the policies of the CCNHCD Plan given that it includes a 2 storey podium.”*
26. It is my opinion that a 2-storey podium by itself (although not included in the final site plan and floor plans) does not mean that the proportions of the building are consistent with the policies of the CCNCHD Plan. The policies included within the HCD Plan evaluates any new proposal in it’s entirety, not just the podium design and thus, it can be concluded that the proposed development does not meet the intent of the guidelines of the CCNHCD Plan. Furthermore, if we consider the latest drawings and site plan that have been submitted, with the absence of the podium and stepbacks further emphasizes the incompatibility of the proposed development’s design with HCD.

Cultural Heritage Landscapes and Heritage Conservation Districts

27. In paragraph 76, Mr, Currie states “*The City of Kitchener has designated significant cultural heritage landscapes in the City OP. Section 12.C.1.9 and Map 9 identify 20 significant cultural heritage landscapes in the City. The CCNHCD is not identified as one of the 20 significant cultural heritage landscapes.*”
28. The Civic Centre Neighborhood Cultural Heritage Landscape has been identified in The City of Kitchener Cultural Heritage Landscapes Study dated December 2014, that was prepared by the Landplan Collaborative Inc.
29. Even though the CCNCHD is not identified as one of the significant cultural heritage landscapes on Map 9 of the OP, it is identified as an HCD in the OP. Due to Civic Centre Neighborhood’s identification as an HCD, an HCD Plan has been developed, implemented and is in effect for this District. It is a much more effective and efficient tool for evaluating and managing alterations, additions, new developments, demolitions, and all other changes within the District.

Official Plan

30. In paragraph 99, Mr, Currie states “*Section 12.C.1.19 [of the Official Plan] reads as follows, “In addition to listing and designating properties under the Ontario Heritage Act, the City may use and adopt further measures to encourage the protection, maintenance, and conservation of the city’s cultural heritage resources including built heritage and significant cultural heritage landscapes and implement Cultural Heritage Resource Conservation Measures Policies in this Plan. These may include but are not limited to covenants and easements pursuant to the Ontario Heritage Act; by-laws and agreements pursuant to the Planning Act (Zoning By-law, demolition control, site plan control, community improvement provisions, provisions in a subdivision agreement); and by-laws and agreements pursuant to the Municipal Act (Property Standards By-law, tree by-law, sign by-law).”*
31. Mr. Currie does not reference the further section, being 12.C.1.20. of the Official Plan, which states: *The City will make decisions with respect to cultural heritage resources that are*

consistent with the policies of the Provincial Policy Statement [Provincial Planning Statement], which require the conservation of significant cultural heritage resources. In addition, such decisions will be consistent with the Parks Canada Standards and Guidelines for the Conservation of Historic Places in Canada.”

32. I agree that the City can ask for additional measures to be addressed and/or implemented through applications pursuant to the Planning Act, such as site plan applications. The City can also ask for additional measures to be implemented to ensure that the cultural heritage value of the HCD will be conserved.

33. The City can also make decisions and recommendations with respect to cultural heritage resources that are consistent with the policies of the Provincial Planning Statement 2024, which requires the conservation of significant cultural heritage resources. In paragraphs 97-106 of my Witness Statement, I have outlined some issues with the HIA and how the HIA has not yet been approved by the City. As such, the City has not been able to take any decisions or implement any mitigation measures through the site plan approval process with respect to the conservation of the HCD. Given that this is an appeal of a non-decision of Council, the City has also not been able to request changes to the HIA or address issues such as the angular plane analysis to ensure its correct application, or issues related to building design.

Urban Design Manual

34. In paragraph 116, Mr. Currie states that *“The portion of section 02.2.7 of the Kitchener Urban Design Manual (above) which is related to cultural heritage value is as follows, “Conserve and retain built forms that are representative of the established neighborhood fabric and/or make positive contributions to the neighborhood identity.”*

35. In paragraph 117, Mr. Currie states *“The above-noted excerpt of the Kitchener Urban Design Manual references the conservation of built forms within established neighbourhoods. Given that the Subject Property is vacant and does not include any built*

heritage resources, the Proposed Development meets the intent of the direction provided in the Urban Design Manual.”

36. The proposed development will have a negative impact on the HCD in my opinion. Mr. Currie argues that since the subject property is currently vacant and does not include any built heritage resources, the proposed development meets the intent of the direction provided in the Urban Design Manual. However, any new development within the HCD, including on the subject property, must also continue to conserve the established built form of the overall neighborhood, and is not just limited to any built heritage resources on the subject property. It should be noted that conserving the established built form of neighborhood does not mean mimicking the established character and architectural styles of the HCD or leaving the site vacant. Instead, it means proposing a development that meets the guidelines and policies of new development within the HCD whose intent is to ensure the continued conservation of the HCD. As I have outlined in my Witness Statement, this development is not compatible with the existing character of the HCD, the existing context of Weber Street does not meet the policies and guidelines of the HCD Plan and will have an adverse negative impact on the HCD.

37. In paragraph 126, Mr. Currie states *“The HIA has concluded that the Proposed Development is compatible with surrounding cultural heritage resources and has a high level of urban design”*.

38. The HIA, however, does not define what a ‘high level of urban design’ is and what it entails. Furthermore, it is my opinion that the conclusions of the HIA cannot be relied upon if guidelines are incorrectly applied.

Angular Plane

39. In paragraph 53 g), Mr. Currie states that *“The HIA takes the approach that the Subject property does not abut any residential property to the rear. Instead, the properties along the south side of Roy Street (which abut the Subject Property) are designated “Office Residential Conversion” as shown on Figure 4 of the CCNCHD Plan. Section 5.2.3. of the*

CCNCHD Study and section 13.1.2.7. of the City OP identify that the Office residential designation is intended to be a buffer or transition between the higher density uses on Weber Street and the low rise residential areas that are in the interior of the CCNCHD. There, it is reasonable to interpret that the intent of the guideline is to apply to the low rise residential area and the 45 angular plane should be measured from the limits of the properties in this designation. If so, the building meets this guideline as shown in Appendix B of the HIA.”

40. In paragraph 114, Mr. Currie states that *“Therefore, in my opinion, the Proposed Development does achieve a sufficient transition to adjacent properties in respect to policies and guidelines of the CCNHCD Plan that addresses these matters”*.

41. In Paragraph 131, Mr. Currie states that *“In this section the Plan Recommends:*

- *Zoning regulations and special provisions similar to those proposed for Victoria Street be considered;*
- *Angular zoning be considered for a section of the street where infill development may be most likely to occur; and*
- *consider the transfer of density rights.”*

42. The “section” referred to by Mr. Currie in the above paragraph is Section 4.2.1. This section actually states that “It is recommended that zoning regulations and Special provisions similar to those proposed for Victoria Street be considered. Angular plan zoning could be considered for a section of the street where infill development may be most likely to occur to better address potential impacts on existing residential/office conversions uses.

Consideration of the transfer of density rights, as described later in this report (Section 4.8), is also encouraged.

43. In paragraphs 52-67 of my Witness Statement, dated February 26, 2025, I have outlined the correct application of the 45° angular plane guideline. I further opined in paragraph 59 that *“The intent of including the angular plane policy was because the HCD Plan anticipated that this portion of Weber Street West will include higher-density development and that sufficient transition should be provided to the immediate low-rise buildings immediately behind this*

portion to protect them from the adverse impacts that might be caused by visual impacts of any new development.”

44. Even though the angular plan guideline in Section 6.9.4 does not explicitly include properties designated as “Office Residential Conversion”, Section 4.2.1 does mention that angular zoning should be considered for sections of Weber Street to address potential impacts on these properties. Even if it was ultimately not implemented, it would be reasonable to interpret that, at the very least, the Plan does acknowledge that these properties could be affected by higher density development on Weber Street. However, due to the incorrect application of the angular plane analysis in the HIA, the HIA does not even contemplate any potential impacts to the properties abutting the subject property i.e. - 27 and 31 Roy Street. Mr. Currie’s above statement, and the HIA, seems to completely ignore this information. Furthermore, because of the incorrect application of the angular plane analysis, compounded with the latest plans lacking any setbacks or stepbacks, the proposed development does not achieve sufficient transitions to adjacent properties in my opinion.
45. In paragraph 57, Mr. Currie states *“The HIA concludes that the Proposed Development is consistent with the policies of the CCNCHD Plan and meets the intent of the guidelines. Even if the building did not strictly meet the guideline in the CCNCHD Plan regarding that 45 degree angular plane for buildings higher than 5 storeys (which in my opinion it does), as shown in section 6.4 of the HIA, the Proposed Development would not result in adverse impacts to the District and its identified heritage attributes”.*
46. In paragraph 137, Mr, Currie states that *“Even if the guideline is interpreted such that the Proposed Development does not meet the angular plane guideline, the HIA has concluded that the height of the proposed building would not introduce unacceptable impacts on adjacent cultural heritage resources and does not alter, destroy or impact the heritage attributes of the CCNHCD.”*
47. I disagree with these statements. Conclusions made in the HIA regarding the impacts of the height of the proposed building even if the proposed development does not meet the angular plane guideline, without proper justification, would be completely inaccurate. Furthermore, neither the HIA, nor Mr. Currie’s Witness Statement sufficiently explain how

the proposed height of 19-storeys in a predominantly low to mid-rise area of the HCD would not introduce unacceptable impacts on cultural heritage resources and does not impact the heritage attributes of the CCNCHD, or at the very least the properties abutting the subject property to the rear. In this case, the justification provided by the HIA cannot be relied upon, and thus, the City cannot support these unreliable conclusions.

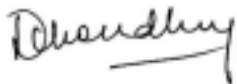
Conclusions

48. Having reviewed Mr. Currie's Witness Statement, in my professional opinion, I cannot reach the same conclusions. In my opinion:

- The witness statement of Mr. Currie does not consider all the applicable sections of the Civic Centre Neighborhood Heritage Conservation District (District Plan).
- The conclusions of this witness statement are based on previous development concept that featured a two storey podium which is no longer being considered.
- The City does not need to identify the Cultural Heritage Landscape in the Official Plan to review properties within a Heritage Conservation District as it related to heritage matters.
- The City's Official Plan provides sufficient direction to ensure that the City will make decisions with respect to cultural heritage resources that are consistent with the policies of the Provincial Planning Statement, which require the conservation of significant cultural heritage resources, and further that decisions will be consistent with the Parks Canada Standards and Guidelines for the Conservation of Historic Places in Canada.
- The application of the 45 degree angular plane analysis in the HIA prepared by the Applicant is completely incorrect. The intent of the angular plane guideline is to ensure that tall buildings don't negatively impact the character of low-rise residential properties and jeopardize their continued residential use. Further, I simply do not agree with Mr. Currie that *"Even if the guideline is interpreted such that the Proposed Development does not meet the angular plane guideline, the HIA has concluded that the height of the proposed building would not introduce unacceptable impacts on adjacent cultural heritage resources and does not alter, destroy or impact the heritage attributes of the CCNHCD."* I cannot understand how the incorrect

application of the angular plan is irrelevant in the conclusions made in the HIA, and how that would not affect the impact analysis of the proposed development on adjacent surrounding properties and on the HCD in general. I also cannot understand how height transitions are not an issue for the proposed development considering the height of it's immediately adjacent heritage resources, and resources abutting the subject property to its rear. I also cannot understand how the City can rely on this information when sufficient justification has not been provided.

- In my opinion, the proposed Applications:
 - a. Do not have appropriate regard for section 2 of the Planning Act;
 - b. Are inconsistent with the PPS, 2024;
 - c. Do not conform with the Region of Waterloo Official Plan;
 - d. Do not conform with the City of Kitchener Official Plan;
 - e. Do not conform with the Civic Centre Neighbourhood Heritage Conservation District Plan; and
 - f. Therefore, do not represent good heritage planning in the public interest.



Deeksha Choudhry, MSc., BES

March 19, 2025