

Millington & Associates

PLANNING & DEVELOPMENT CONSULTANTS

3380 South Service Road, Burlington, Ontario, L7N 3J5 Office: (905) 639-3892 Fax: (905) 333-9544

Bianca Bielski, Manager of Planning Services
City of Burlington

Re: Intention to Demolish
795 Brant Street

Bianca

RECEIVED

June 2, 2015

JUN 04 2015**CITY OF BURLINGTON
PLANNING DEPARTMENT**

I have reapplied again to demolish the house at the above address (see attached). As you will recall I pulled the last request from the Council agenda to demolish this house. The main reason was that I hadn't really given the historical assessments that much consideration. However once I found that staff was not going to support my clients request I read the reports by previous Heritage people retained by the City and a student who reviewed and graded the house. I was surprised to see in the grading that many issues were given such a high rating. These issues listed below jumped out at me and I couldn't understand why they were given such a high grade. I understand that the house was graded as a 82 and 80 would have allowed demolition.

- the house was not built by Mr. Ghent but by a Mr. Jabez Bent who is not mentioned in any of the given names associated with this building. Why the following names "The William Ghent House" or "The Bray-Ghent House" or "Maple Lodge". No mention of Mr. Bent
- the Mr. Ghent who we are referring to was a fifth generation Ghent.
- Mr. Ghent bought this home 42 years after it was built and had no input to the construction or design of the home.
- I was surprised to see this 161 year old home was only occupied by Mr. Ghent for 13 years.
- We note that Mr. Ghent shortly after his purchase set about subdividing his recent purchase into lots (see attached registered plan signed by Mr. W. Ghent as the developer).
- Mr. Ghent then sold these lots and the farm house and moved on.

Reading the historical background and reviewing the grading as a layman I had concerns. I met with a highly respected Heritage Planner for advice he also had concerns with the rating. As a respected Heritage planner he also raised several other good points. We have retained this Heritage Planner and his report is being finalized which we will get you copies of once it is completed.

However should the City wish to purchase, relocate or do a photo inventory you have our full cooperation.

It may not seem like it but we do want to work with the City and the Heritage people.

Thank you

Millington & Associates



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Angela Morgan, City Clerk, Clerks Department
City of Burlington

June 2, 2015

Re: 795 Brant Street

Please be advised that I Anthony Millington acting as agent for the land owner of the above noted lands intend to demolish the subject property at 795 Brant Street under section 27 (3) of the Ontario Heritage Act.

27 (3) If property included in the register under subsection (1.2) has not been designated under section 29, the owner of the property shall not demolish or remove a building or structure on the property or permit the demolition or removal of the building or structure unless the owner gives the council of the municipality at least 60 days notice in writing of the owner's intention to demolish or remove the building or structure or to permit the demolition or removal of the building or structure. 2006, c. 11, Sched. B, s. 11 (2)."

Yours truly

Anthony Millington

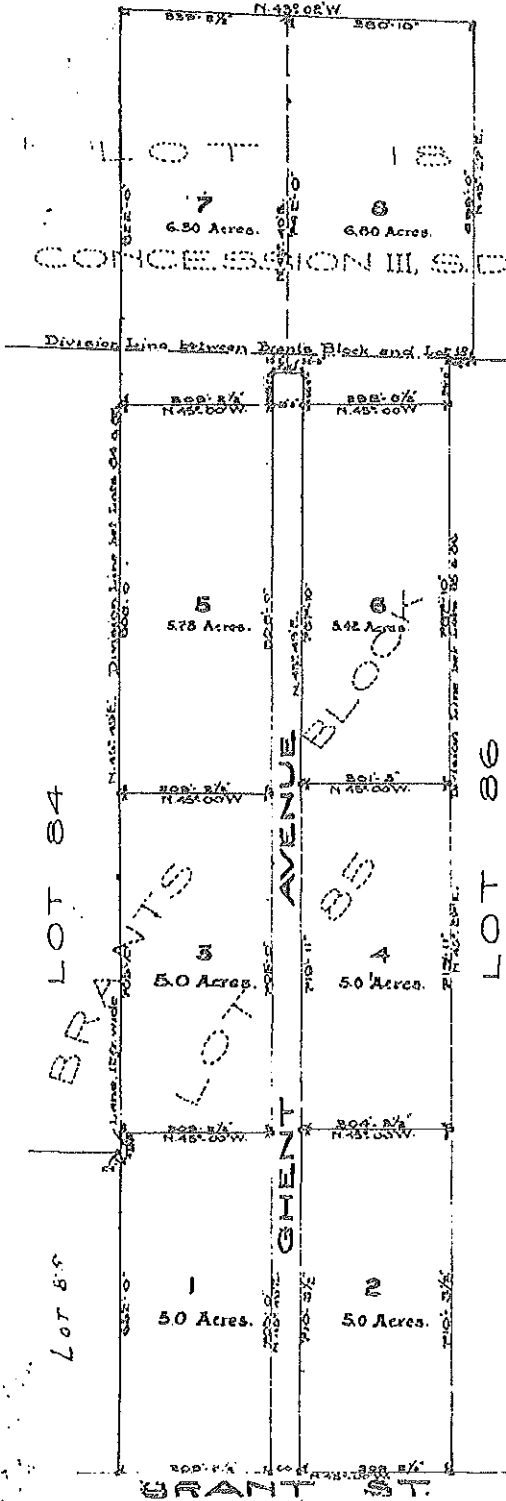
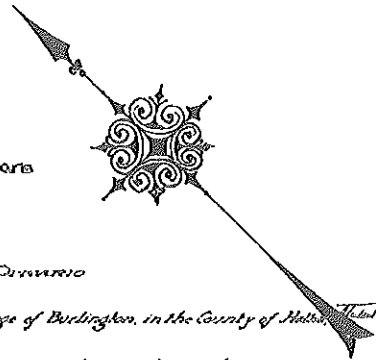
No 125

PLAN

showing subdivision of
PART OF
LOT NUMBER 85, BRANT'S BLOCK
AND PART OF LOT 18, CONCESSION III, S.D.S.
Township of Nelson.

AS LAID OUT BY
WILLIAM GIBERT ESQ.
Scale: 200ft. = 1 in.

Tyrrell & Meehan,
Civil Engineers & Surveyors
Hamilton, Canada.



Province of Ontario
To Wit

I, William Gibert, of the Village of Burlington, in the County of Halton, do hereby
make oath and say:
1st That I was personally present and saw the within plan
duly signed in duplicate by the said William Gibert
2nd That the said plan and duplicate were signed in the
said Village of Burlington, Ontario, L.
3rd That I know the said party
4th That I am a subscribing witness to the said plan and
duplicate

Sworn before me, at the said Village of Burlington, this 5th day
of March, A.D. 1909.

Notary Public.

The Municipality of the Township of Nelson approves of this plan

(Clerk)

This plan has been prepared under my instructions, and
with my approval for Registration.
Dated this 12th day of March, A.D. 1909. _____ (Owner)

(Witness)

I hereby certify that this plan accurately shows the
manner in which the land included therein has been
surveyed and subdivided by me, and that this plan
has been prepared in accordance with the provisions of
the Registry Act.
Dated this 5th day of March, A.D. 1909. W. Tyrrell
Civil Engineer & Surveyor

I hereby certify that the within plan is duly entered and
registered in the Registry Office for the County of Halton,
at 10 o'clock, 10 minutes, of the 9th day of April, A.D. 1909.
No. 125 _____
D. Robertson
Registrar

Note: Sign "thus" denotes stake planted

Mr. Khai Tuyen Ly and Ms. Donna Yuk Kit Lee,
C/O The Studio Hair Design,
795 Brant Street,
Burlington,
Ontario,
L7R 1A1

May 27th 2015

Dear Mr. Ly,

Re: Opinion on cultural heritage matters and designation under Part IV of the *Ontario Heritage Act*, 795 Brant Street, Burlington.

1.0 Introduction

In response to your request regarding the above, this letter report addresses the proposed designation of a former farmhouse at 795 Brant Street, Burlington. I provide an opinion on the appropriateness of the City of Burlington's response to designate the property following a proposal for demolition under Part IV of the *Ontario Heritage Act*. In preparing this report I have also made site visits to the property on May 21st and May 25th, 2015.

In particular I have reviewed the heritage evaluation processes and results undertaken by the City over the past decade. I have also reviewed the City of Burlington staff report (PB-54-14, *Report recommending refusal of request to remove 795 Brant Street from Municipal Register for demolition*). The staff report was prepared for consideration by the City of Burlington Development and Infrastructure Committee, May 11, 2015. I understand that this staff report was eventually removed from the agenda and not formally considered by the Committee.

This letter report concludes with a recommendation on the suitability or appropriateness of designating the subject property under Part IV of the *Ontario Heritage Act*.

I conclude on Page 17 that the subject property is not a suitable candidate for designation under Part IV of the *Ontario Heritage Act* for the following reasons:

- The historical association with William Ghent is overstated by City staff as Ghent occupied the building for only thirteen (13) years;
- The design value of the structure cited by City staff as being a "good example" is overstated as there have been many alterations and additions to the building fabric which detract from any former heritage integrity that may have existed; and
- There is no analysis by City staff to support the staff opinion that the property has "contextual value".

I recommend that no further action be taken by staff or Council of the City of Burlington with respect to the designation of the subject property under Part IV of the *Ontario Heritage Act*.

2.0 Structure of this report

In order to provide structure to this letter report I have used the City of Burlington staff report (PB-54-14) as the basis for my response. This letter report should be read in conjunction with the attached staff report.

3.0 City of Burlington Report PB-54-14: *Report recommending refusal of request to remove 795 Brant Street from Municipal Register for demolition.*

3.1 "Purpose" (Page 1)

City staff advises that the purpose of the staff report responds to a letter indicating an intention to demolish the house at 795 Brant Street. The staff recommendation and title of the staff report addresses this subject by proposing to:

"refuse the request to remove 795 Brant Street, Burlington, from the Municipal Heritage Register for demolition".

The report also proposes that Council designate the subject property under Part IV of the *Ontario Heritage Act*.

An inappropriate administrative response

Subsection 27.(1) of Part IV of the *Ontario Heritage Act*, requires that "The clerk of a municipality shall keep a register of property situated in the municipality that is of cultural heritage value or interest." In 2005 the Act made new provisions and enabled municipalities to assign non-designated properties to the register. This is the case here.

Unlike designation of property under section 29 of the Act (requiring rigorous analysis of potential heritage properties against a series of formal criteria established by *Ontario Regulation 9/06*) the test for inclusion of non-designated property in the register requires only that the council of the municipality "believes" a property to be of cultural heritage value or interest. In other words a municipal council does not need to know beyond a doubt that a property is of known heritage value as it would with a designated property.

Information on non-designated properties to be contained in the register is restricted to a description that "is sufficient to readily ascertain the property", essentially a commonly recognizable property address. The Act requires consultation with a council's municipal heritage committee prior to including a non-designated heritage property in the register.

The consequence of including a non-designated property in the register requires that:

the owner of the property shall not demolish or remove a building or structure on the property or permit the demolition or removal of the building or structure unless the owner gives the council of the municipality at least 60 days notice in writing of the owner's intention to demolish or remove the building or structure or to permit the demolition or removal of the building or structure.

Although unstated in the Act the intent of the 60 day period is to provide for consideration of

potential municipal actions such as designation under the Act or further negotiation to accommodate other forms of conservation or mitigation.

In this respect staff has inappropriately responded to the issue of demolition as an action requiring some form of review and subsequent determination of approval or refusal on the City's part. This is not the case. The owner only needs to provide "notice" and is not required to seek any form of City approval or permission under the Act.

- It is my opinion that City of Burlington staff has not provided an appropriate administrative response to the matter of demolition as provided under Part IV of the *Ontario Heritage Act*.

3.2 "Background" (Page 2)

City staff has advised in this section of the report that the staff report is responding to a written request requiring removal of the property from the register to allow demolition and not as indicated previously as simply an intention to demolish the house at 795 Brant Street. The staff recommendation and title of the staff report addresses this subject by proposing to:

"refuse the request to remove 795 Brant Street, Burlington, from the Municipal Heritage Register for demolition".

The report erroneously states on Page 2 that *"Council must render a decision on or prior to June 13th, 2015"*. As I have noted previously staff has inappropriately responded to the issue of demolition. The owner only needs to provide "notice" and is not required to seek any form of City approval or permission.

It is my opinion that the City of Burlington could have provided more fulsome advice to the current owner in this matter under the *Ontario Heritage Act* with a clear and appropriate administrative response to the matter of demolition as provided under Part IV of the *Ontario Heritage Act*.

City staff also inappropriately declares that *"Council must make a decision as to whether to designate the property pursuant to the Ontario Heritage Act in order to protect it from demolition or to remove the property from the Municipal Register to allow its demolition."* The Act is silent on the matter of any Council deliberations or actions and provides no direction in this regard. Non-designated property does not have to be removed from the Register for demolition to proceed.

- In my opinion the City of Burlington staff has not provided appropriate advice in the matter of demolition as provided under Part IV of the *Ontario Heritage Act*.

In the third paragraph of the staff report a summary is provided of the various heritage evaluations undertaken by Heritage Burlington. I have reviewed copies of the original evaluation sheets and scores as follows: 1995, score of 89, J. Irwin; 2003, score of 92, Co-op student(?), C. Mahood; and 2014, score of 82, Consultants S. Clarke and K. Jonas Galvin.

I note that in the last evaluation it is specifically commented on by the reviewers in examining "City/LACAC documents" that they indicate "none available". This does cast into some doubt the authenticity or veracity of the entire evaluation processes that have occurred in the past and upon which the proposed designation is rationalized.

Certainly, there appears to be no additional in-depth historical or architectural research to support the proposed designation as might be reasonably be expected. There are no supporting historical photographs or contemporary historical descriptions which provide a benchmark for determining design or physical value. Importantly, there is no analysis in the past evaluations or currently by City staff in the staff report that addresses the matter of original building integrity and the subsequent alterations that detract from design and physical values. These considerations are also similar in addressing the integrity of the structure's setting and how the context and surroundings of the subject property have dramatically altered. In the absence of any staff or volunteer research material I have retrieved a historical photographic and text information from readily available sources. These are contained later in this letter report.

- I have reviewed all three evaluation processes and I am of the opinion that in all instances the evaluations are overstated. This occurs most notably in those factors or criteria referencing architect, environment, integrity, and usability. However, reliance on these evaluations may be sufficient to support inclusion of non-designated property in the City of Burlington's Municipal Register of cultural heritage properties.
- It is my opinion that these preliminary evaluations are not a substitute for more detailed and rigorous research required in support of a prospective Part IV designation.

I provide more detailed commentary on the evaluation results later in this report as these appear to have been used by City staff as the basis for supporting designation under Part IV.

3.3 "Discussion" (Page 2)

This is a short paragraph that asserts that 795 Brant Street is *"a good example of an early vernacular style farmhouse"*. I disagree with this opinion.

The structure has been substantially altered with sizable, prominent additions at the side and rear. Several fire-escapes, signage, conversion of windows to doors and a variety of extraneous lighting, canopy installation and commercial signage have been installed. There has been extensive replacement of original windows and doors. Of the many decorative shutters installed in the past several are now missing. Most notably the entire former red-brick façade has been painted.

3.4 "Statement of Significance" (Page 3 to Page 5)

Cultural Heritage Value

It is assumed for the purposes of this letter report that the section title is intended to form part of a future notice of intention to designate under part IV of the Act. The proposed statement of *Cultural Heritage Value* indicates that "Maple Lodge" is *"a good example of an early vernacular style farmhouse"*. This is an overstatement. It is not supported by an objective evaluation of the current form and appearance of the property compared with its former state. A more detailed description of past changes is described at Pages 7-8. I conclude that the past changes are neither

sympathetic nor complementary to the former appearance of the subject structure. It cannot be cited as a "good example".

Staff notes that "*The house is significant as it provides the evidence of Burlington's past*". While I would generally agree that most unaltered heritage structures would provide some evidence of a municipality's past, but it does not follow nor can it be concluded that this specific, much altered house or any other similar form of house is therefore "significant".

Accordingly, I disagree with staff's opinion.

Historical or Associative Value

With respect to *Historical or Associative Value* staff indicates that the structure has been owned and used for a number of purposes. Together with information I have collected this can be summarized as follows:

<i>Date (years):</i>	<i>Function and use</i>	<i>Owner</i>	<i>Lot size</i>
1854-1859 (5)	Farmhouse	Jabez Bent	75 acres (?)
1859-1896 (37)	Farmhouse	Frederick Bray	75 acres
1896-1909 (13)	Farmhouse	William Ghent	53 acres
1909-1935 (26)	Residence	Edward Harmon	Unknown
1935-1975 (40)	Residence	Alphonse Brooks	Unknown
1975-2015 (40)	Commercial	Unknown and current	Unknown

It is readily apparent that despite staff's assertion that the Ghent family farmed continuously in Burlington for 150 years, it does not appear that it was at this single location. William Ghent occupied the farmhouse for only thirteen (13) years and staff indicates that by 1909 Ghent was subdividing the property into smaller lots. For the most part it appears that the structure was in residential use and occupied for a much longer period by the Alphonse Brooks family. The use of the term "*William Ghent House*" is therefore not wholly appropriate as he was neither the builder of the farmhouse nor the occupant for any great length of time.

Contextual Value

Staff assert that the structure is a landmark and hence has contextual value.



Photographs: May 21st, 2015



No visual material or written analysis is presented that supports this assertion. The structure is

screened by a variety of trees, is modest in height and indistinctive in structural character. The surrounding three quadrants of the four corners at the intersection of Brant Street and Prospect Street are occupied by commercial plazas (Northwest and southwest) and an office building (Northeast).

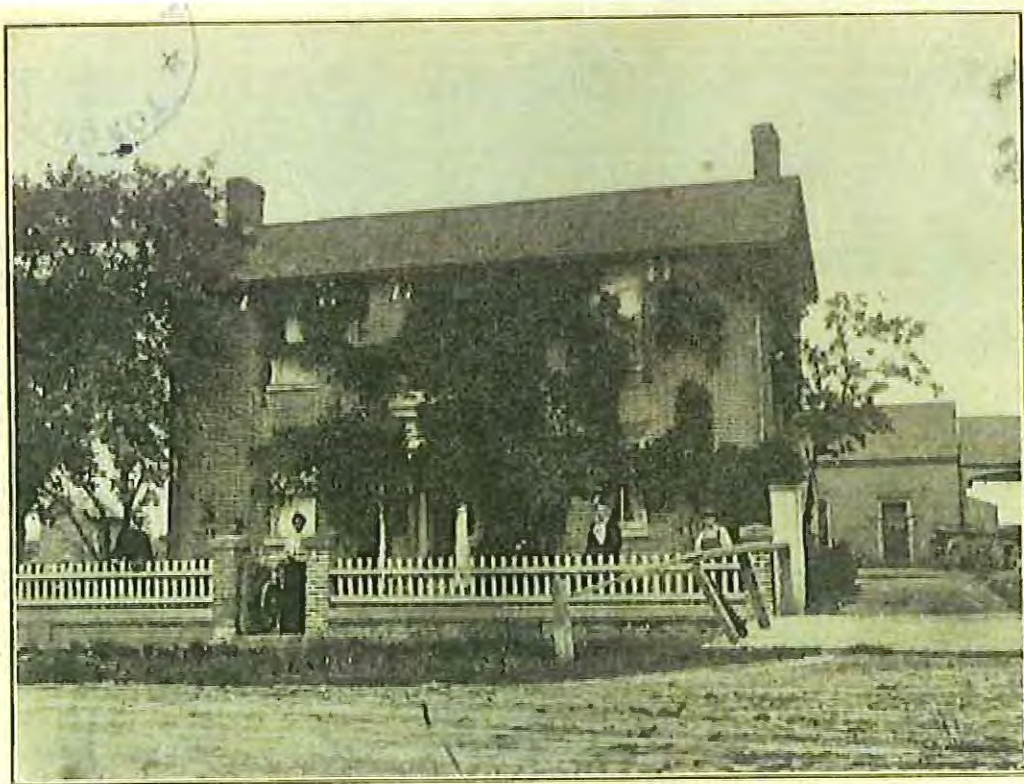
I disagree with staff's opinion that the structure has contextual value.

Design or Physical Value

Staff describe the structure as follows: *The "William Ghent House" is a two-storey solid brick structure with end gable roof, and features symmetrical [sic] three-bay façade and rear additions. The multiple rear additions were likely added over the years as the family grew.*

The allusion to the rear additions as having cultural heritage value related to the William Ghent family is speculative and not supported by any factual accounts or historical photographs.

A 1902 photograph (below) depicts the structure with all ancillary buildings at the end of the drive-way, set to the rear of the house as detached components. These include a brick drive-house and stable. There is no evidence to support the notion that rear additions had been constructed by William Ghent for his growing family in the interval between 1902 and 1909 when he sold the property. A site inspection confirmed that the rear additions are of later construction.



RESIDENCE OF W. GHENT, ESQ., BURLINGTON.

"The Garden of Canada", Burlington, Oakville and District. Page 45. 1902.

Staff identifies a number of existing building characteristics and concludes that *"There have been minor changes to the heritage attributes but the original character is retained"*.

The historical photograph and accompanying text (below) provide an objective benchmark from which changes can be observed and conclusions made with respect to such changes as being minor or major.

"MAPLE LODGE," RESIDENCE OF W. GHENT, ESQ.,

That very desirable property, situate on Brant Street, between Burlington Village and the G. T. R. Station, owned by William Ghent, Esq., of Freeman P.O., Ont., Canada.

The farm consists of fifty-three acres of the most choice sandy loam, all under a high state of cultivation, and is only one-half mile from Burlington Village and Lake Ontario. The land is particularly adapted for fruit or garden purposes, and only nine miles from Hamilton—the finest market in the Dominion—by G.T.R. and electric car service, car every hour.

The fruit consists of the following: Apple, pear, plum, cherry, peach, currants, berries, etc., all in good, thrifty condition, with abundance of first-class water.

The buildings consist of good nine-roomed brick house, brick drive-house and stable, frame barn and sheds; the buildings are worth at least \$2,500.

The principal crops are: Tomatoes, melons, strawberries, raspberries, cabbage, cauliflower and roots of all kinds; also wheat, oats, barley, rye and clover.

The produce on Mr. W. Ghent's farm for one year is as follows: 10,000 quarts of strawberries, 3,000 quarts of raspberries, 36 tons of tomatoes, 90 tons of mangolds, 2,000 crates of melons, 12 tons of cabbages, egg plants and peppers, 800 bushels of grain; 53 bushels to the acre of wheat, oats and barley. All grain used for feed on the place. Price \$10,000.

—45—

"The Garden of Canada", Burlington, Oakville and District. Page 45. 1902.

A review of the historical 1902 photograph and related descriptive text indicates the loss of many features related to the property and the subject structure, including:

- Loss of brick drive-house
- Loss of brick stable
- Loss of front yard wall and picket-fencing
- Loss of colonnaded porch at the front entrance
- Loss of original doorway
- Loss of original two-over-two, wood, sash windows

Site visits on May 21st and May 25th have confirmed the occurrence of a number of intrusive building alterations over the past decades, including:

- Installation of vinyl windows on all facades
- Installation of decorative window shutters on all facades
- Installation of a door, concrete pad and “detailed wood surround” on west (front) façade
- Blocking-in of several former window openings
- Cutting in new window openings on north (side) facade
- Cutting in new doorway on north (side) facade
- Encapsulation of sills in metal cladding
- Encapsulation of roof bargeboard in metal cladding
- Installation of exterior lighting over central entrance doorway
- Installation of commercial signage
- Conversion of a window opening to doorway
- Installation of fire-escapes on the north façade
- Installation of fire-escapes on the south façade to window opening converted to door opening
- Installation of asphalt shingles
- Installation of sky-light on east facing roof
- Installation of canopy or awning on north façade over new door opening
- Installation of chimney at rear
- Installation of various vents at the rear
- Painting of the exterior brickwork

All of the foregoing constitutes substantial, cumulative changes that harm the heritage integrity of the structure. I disagree with City staff that these constitute “minor changes”. The following photographs illustrate these alterations noted above.



West façade, fronting Brant Street.



Central doorway, much altered with circa 1950s door and decorative surround.



Concrete pad and step with circa 1950s door surround.



Recent vinyl windows, decorative metal shutters and metal clad sills.



South (side) façade showing extensive alterations: fencing, fire-escape and large side addition.



Attached fencing and fire-escape.



Former window opening converted to doorway with access to fire-escape.



North (side) façade with new doorway and window openings, blocked-in windows and attached overhead awning.



New doorway, attached overhead awning and recent single pane window.



Installation of contemporary signage at second storey.



Second storey alterations: new window openings and blocking-in of original opening.



Remnant former window opening, decorative metal shutters and vinyl windows.



Remnant former window opening.



Deteriorated "watertable" feature patched with cementitious rendering at left.



Bargeboard sheathed in metal cladding with vinyl windows below flanked by decorative metal shutter with deteriorated voussoir mortar joints above window.



East façade showing additions and alterations.



Post 1975 rear addition.



Deterioration of softer brick due to water infiltration.



Exhaust vents and later chimney addition.



Skylight and roof vent.

Character-Defining Attributes

Notwithstanding my opinion that the subject property is inappropriate for designation under Part IV of the Act I do provide comments on the "attributes" discussed in the staff report. The *Ontario Heritage Act* requires in any Notice of Intention to Designate that the Notice contain a "*Description of Heritage Attributes*". It is assumed that the "character defining attributes" referred to in the staff report constitute the "heritage attributes". These must be written in a very precise and specific manner. The "attributes" constitute the triggers that determine whether the permission of Council is needed for any proposed alterations once a property is designated.

I am of the opinion that the following stated attributes are unclear or inaccurate:

- The reference to "*Contextual relationship*" is ambiguous and imprecise.
- The "*subsequent rear additions*" are not considered to be cultural heritage features or attributes.
- The reference to "*The Solid Brick construction*" is not supported by any structural investigations to support the assertion of "solid brick". Early brick kilns were often established on-site and required a ready available source of clay. Uneven firing often resulted in poor quality brick and long term durability was often compromised. This appear to be the case here.
- "*The Central Door at the front façade with detailed wood surround*" is not original to the structure and cannot be considered a heritage attribute.
- The reference to "*Wooden Voussoirs*" is inaccurate. Voussoirs are typically masonry, wedge shaped elements, that form an arch.

If these "attributes" are removed from the list of heritage attributes only a tenuous description of the property remains.

Strategy/Process

The City staff report correctly identifies that for a property to be designated under Part IV of the *Ontario Heritage Act* it must satisfy one or more criteria contained in *Ontario Regulation 9/06*. Staff is of the opinion that the subject property satisfies all three criteria: Design or physical value; historical or associative value; and contextual value. I disagree with this opinion and the evaluation upon which it is based.

Criterion 1

Staff advise that Criterion 1(i) is met because the *"house is a good example of an early vernacular style farmhouse with minor changes to the heritage attributes"*. I disagree.

The form of the original structure has been compromised by the construction of many structural additions. Other alterations have resulted either in the addition of many intrusive elements such as fire-escapes and signage or the loss of original building fabric such as windows and doors.

- The subject property has been compromised and does not satisfy *Ontario Regulation 9/06* criterion 1 (i).

Criterion 2

Staff advises that Criterion 2(i) is met because the *"property is associated with the Ghent family, a prominent farming family in Burlington"*. In differentiating between the "property" and the "house" I assume that staff is attempting to ascribe different cultural heritage values to the land and different cultural heritage values to the structure. I disagree with this approach.

It is evident that William Ghent farmed at this location for a very short period of time: thirteen (13) years from 1896 to 1909. At the end of his ownership it is clear from the staff report that William Ghent was subdividing the property into smaller lots and non-farm uses. The subject property was farmed for a short period by a single member of the Ghent family (i.e., William Ghent). This is a length of time that is insufficient to warrant consideration of this as a long-term association of farming the land at this location by many generations of the Ghent family. This criterion is not satisfied.

- The subject property does not satisfy *Ontario Regulation 9/06* criterion 2 (i).

Criterion 3

Staff advises that from a "contextual perspective" the property satisfies two criteria. The citing and use of the relevant criteria by staff has been incorrectly applied and there is some resulting confusion.

Criterion 3(i) addresses the matter of whether a property defines, maintains or supports the character of an area. As a rationale for satisfying this criterion staff state that *"the house is historically tied to its surroundings as the development around it (including Ghent Street) was part of the original farm"*.

This rationale is mistakenly drawn from Criterion 3(ii) which indicates that contextual value may be derived from its physical, functional, visual or historical links to its surroundings.

Regardless of this mis-application of criteria it is my opinion that with respect to Criterion 3(i) the subject house does not define, maintain or support the character of the area. Staff has generally identified the character of the area but provides no argument in support of the successful fulfilment of the criterion.

In applying Criterion 3(ii) staff provides no rationale for the assertion that *"the house is historically tied to its surroundings"*. In as much as the house is in its original location, the house currently bears no physical, functional, visual or historical links to any agricultural and farming origins.

- The subject property does not satisfy *Ontario Regulation 9/06* Criterion 3(i) or Criterion 3(ii).

Criterion 3(iii) of *Ontario Regulation 9/06* addresses the matter of contextual value deriving from a property being a landmark. Staff simply assert that *"the property is a landmark"* with no supporting visual or documentary analysis. Simply stating that the property is the *"last vestige of former use and last farmhouse"* does not constitute the identification and evaluation of the property as a landmark, having contextual value.

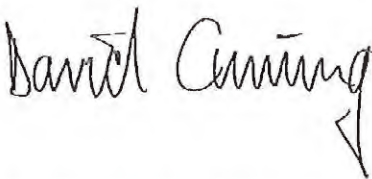
- The subject property does not satisfy *Ontario Regulation 9/06* Criterion 3(iii).

4.0 Recommendations

Following site visits to the property, a review of the City of Burlington's staff report on this matter and undertaking brief research I can advise that I am of the opinion that the subject house and property do not satisfactorily meet the criteria contained in *Ontario Regulation 9/06* of the *Ontario Heritage Act*. I disagree with staff's opinion and I consider that the property is not suitable or appropriate for designation under Part IV of the *Ontario Heritage Act*.

I recommend that no further action be taken by staff or Council of the City of Burlington with respect to the designation of the subject property under Part IV of the *Ontario Heritage Act*.

All of which is respectfully submitted.



David J. Cuming, MCIP, MRTPI, RPP
Professional Consulting Services
Cultural Heritage Resource
Planning and Conservation