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File No. 703951

December 5, 2022

**By E-Mail Only to *kevin.arjoon@burlington.ca***

Mr. Kevin Arjoon, City Clerk  
The Corporation of the City of Burlington  
426 Brant Street, P.O. Box 5013  
Burlington, ON L7R 3Z6

Dear Mr. Arjoon:

**Re: City of Burlington  
Proposal to List 468 Elizabeth Street, Burlington on the Heritage Register  
Objection to Listing due to Lack of Particulars  
Request for Deferral**

We are counsel to Crystal Homes, the owner of 468 Elizabeth Street (the “**Subject Property**”).

We are writing in response to the City’s proposal to list the Subject Property on the Heritage Register.

Having received a five-sentence written justification for the proposed listing of the Subject Property in the Heritage Register, our client requests more time to complete their own, more detailed, study.

Independent study is necessary as the particulars included in the justification fail to provide insight into the nature of the purported heritage value of the Subject Property. Accordingly, our client disagrees with the proposed listing of the Subject Property.

Given the specialized nature of the knowledge required to conduct a thorough study, we anticipate that there will not be sufficient time to complete the work ahead of Council’s meeting on December 13, 2022. Given the upcoming holiday season, we expect that such constraints will last into the new year.

A deferral is appropriate and proportionate under the circumstances, given the considerable, uncompensated, inconvenience that is created by being listed in the Heritage Registrar under the *Ontario Heritage Act*.

Yours truly,  
**DAVIES HOWE LLP**



Aaron I. Platt  
Professional Corporation

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copy: Mr. John O'Reilly, City of Burlington, Planner II, Heritage