



County of Brant Council Report

To: The Mayor and Members of County of Brant Council
From: Brandon Kortleve, Manager of Policy Planning, Policy Planning Division, and Emily Stanley, Nethery Planning, Consulting Planner for Policy Planning Division
Date: April 14, 2026
Report #: RPT-0153-26
Subject: Omnibus Official Plan Amendment (OPA3-C-25) – Cultural Heritage Policies
Purpose: For Approval

Recommendation

That Report RPT-0153-26, regarding updates to Phase 1 of the Omnibus Official Plan Amendment project, consisting of the cultural heritage policy updates, be received as information;

And that the proposed by-law attached hereto as Appendix “C”, to amend the County of Brant Official Plan, A Simply Grand Plan (2023), by adding new policies with respect to Cultural Heritage, BE APPROVED.

Executive Summary

Consistent with the Provincial Planning Statement, 2024, the County’s Official Plan establishes a strong commitment to the conservation of cultural heritage resources as an integral component of land use planning. These resources, which include built heritage resources and cultural heritage landscapes, play an important role in shaping community identity, sense of place, and long- term livability across the County.

This Official Plan Amendment introduces refinements to the cultural heritage policy framework to improve clarity, consistency, and effectiveness in implementation. The amendments strengthen the use of the Heritage Inventory as a proactive planning tool, clarify adjacency and study requirements, establish a clear hierarchy for adaptive reuse, relocation, and compensation, and introduce greater flexibility in cases of unforeseen loss while reinforcing accountability where deterioration results from neglect. The revised structure consolidates existing and proposed policies into a more coherent framework that is easier to interpret and apply for property owners, applicants, and reviewing authorities.

Overall, the amendment represents a refinement of policy implementation rather than a change in policy direction, supporting alignment with provincial policy, improved development certainty, and the effective conservation of the County’s cultural heritage assets.

Strategic Plan Priority

Strategic Priority 2 - Focused Growth and Infrastructure

Impacts and Mitigation

Social Impacts

The proposed amendments support the conservation and interpretation of cultural heritage resources as valued community assets, contributing to a shared sense of place, identity, and continuity. By improving clarity and predictability in heritage-related decision-making, the policies also support public understanding of how heritage conservation is balanced with growth and change.

Environmental Impacts

There are no direct environmental impacts associated with this report. Indirectly, the policies may support environmental sustainability by encouraging adaptive reuse and reinvestment in existing buildings and landscapes, which can reduce demolition waste and the need for new resource-intensive development.

Economic Impacts

The proposed amendments are intended to improve certainty and consistency in the development review process, supporting informed investment decisions while managing heritage considerations. By introducing greater flexibility in cases of unforeseen loss and promoting adaptive reuse, the policies aim to balance conservation objectives with economic viability and long-term community benefit.

Report

Background

In mid-2025, the County initiated an omnibus Official Plan Amendment (OPA) project to update select sections of the Official Plan to ensure policies remain current, effective, and aligned with Provincial policy, emerging issues, and local implementation experience. The amendments are being advanced on a topic-by-topic basis, allowing for focused review and engagement outside of a comprehensive Official Plan review.

The omnibus Official Plan Amendment project was introduced to Council in June 2025 ([Report RPT-0243-25](#)), and a statutory public meeting was held on July 8, 2025 ([Report RPT-0243-25](#)) to share project information and to receive preliminary input from the public and stakeholders. The cultural heritage policies were presented to the Heritage Committee in November 2025, where feedback received has since helped inform the proposed amendments. The first set of draft cultural heritage policies were presented for information at a statutory public meeting on November 11, 2025 ([Report RPT-0383-25](#)). Through the review process, comments were received from the Province and the Brant Heritage Committee. No public comments have been received. Staff also considered implementation experience and issues identified through recent development applications and planning inquiries.

Minor adjustments were made to the proposed policies in response to comments received, primarily to improve clarity, consistency, and implementation. This report presents the final draft Official Plan Amendment for Council's consideration, along with an analysis and planning justification demonstrating consistency with provincial policy and alignment with County objectives.

Analysis

Existing Policy Framework

Part 5, Section 2.17 of the Official Plan provides policy direction for the protection of cultural heritage resources. This section builds on matters of Provincial interest related to cultural heritage conservation as set out in the Planning Act (Section 2(d)) and the Provincial Planning Statement, 2024 (PPS 2024).

While the existing policies establish procedures for identifying and addressing heritage resources through the development process, they are largely procedural in nature and lack a clear overarching framework, articulated objectives, or consistent terminology aligned with current provincial policy and legislation. Experience applying these policies has identified challenges related to clarity, interpretation, and consistency in implementation, particularly as heritage considerations become more complex and increasingly integrated with land use planning decisions.

The proposed Official Plan Amendment proposes to expand Section 2.17 to better reflect contemporary heritage planning practice, evolving Provincial policy, and the County's strategic direction as set out in the 2024 Arts, Culture and Heritage Strategy. The policies of this section of the Plan are intended to:

- a) Identify, protect and conserve cultural heritage resources and landscapes as valued community assets.
- b) Ensure development results in a net benefit to the County's heritage assets.
- c) Embed clear conservation principles and study requirements into the planning process.
- d) Support adaptive reuse and context-sensitive growth that respects historic character.
- e) Improve consistency, predictability, and collaboration in heritage-related approvals.

Implementation Barriers

Recent changes to Provincial policy and legislation have altered how cultural heritage tools can be applied, often limiting municipal flexibility and reinforcing a perception of heritage conservation as a barrier to development rather than a tool to manage change. At the same time, municipalities continue to face pressure to accommodate growth, address housing needs, and provide greater certainty through the planning process. Within this context, the County's existing cultural heritage policies have proven largely procedural, offering limited direction on desired outcomes or how heritage considerations should realistically be integrated with broader planning objectives.

Experience applying these policies has identified challenges related to clarity, predictability, and implementation, particularly as heritage considerations become more complex. The proposed amendment responds to these challenges by repositioning cultural heritage conservation as an integral component of land use planning rather than a stand-alone regulatory exercise.

The amendment introduces a revised structure that improves the readability, usability, and effectiveness of the cultural heritage policies. New purpose statements, goals, objectives, and a guiding policy framework establish a clear foundation for decision-making and provide context for the detailed policies that follow. This approach represents a deliberate shift from a purely procedural model toward a more comprehensive, outcomes-oriented cultural heritage framework that emphasizes conservation, collaboration, and alignment with broader County initiatives.

Policy Changes – October 2025

The October 2025 proposed amendments were intended to clarify and strengthen the County's existing cultural heritage policy framework in response to implementation challenges identified through development review, committee input, and Provincial comments. Key changes included restructuring the policies for improved usability, introducing guiding conservation principles, clarifying study requirements and timing, strengthening direction for the Heritage Inventory, and refining policies related to adjacency, demolition, and mitigation. The October amendments also introduced greater flexibility for reconstruction following unforeseen damage, while establishing clearer expectations where deterioration results from neglect. Overall, these changes were primarily focused on improving clarity, consistency, and implementation, rather than altering the fundamental objectives of heritage conservation in the Official Plan.

Policy Changes – April 2026

The April 2026 draft consolidates and refines both the 2023 policies and the October 2025 amendments into a more coherent, outcome-oriented cultural heritage framework. The proposed policies reposition cultural heritage conservation as an integral component of land use planning by introducing clear purpose statements, goals, and a guiding policy framework; strengthening the Heritage Inventory as a proactive planning tool; clarifying adjacency through a defined radius; and establishing a clear hierarchy for adaptive reuse, relocation, and compensation. The policies also distinguish between loss resulting from unforeseen events and deterioration through neglect, balancing flexibility for property owners with accountability for conservation outcomes. Together, these refinements are intended to improve clarity, predictability, and alignment with provincial policy while supporting growth and directing change in a manner that delivers a net benefit to the County's cultural heritage resources.

Policy Directions and Justification

This Official Plan Amendment introduces a refined cultural heritage policy framework that strengthens the integration of heritage conservation into land use planning while improving clarity, predictability, and implementation outcomes. Key directional changes include:

- Establishing clear purpose statements, goals, and guiding conservation principles to support consistent decision-making.
- Strengthening the Heritage Inventory as a proactive planning tool to identify and address heritage considerations early in the development process.
- Clarifying adjacency and study requirements to improve certainty for applicants and reviewing authorities.
- Introducing a clear hierarchy for adaptive reuse, relocation, and compensation to ensure development results in a net benefit to the County's cultural heritage assets.
- Distinguishing between loss resulting from unforeseen events and deterioration through neglect, balancing flexibility for property owners with accountability for conservation outcomes.

These changes are intended to improve implementation and alignment with provincial policy rather than alter the fundamental objectives of the Official Plan. A detailed planning rationale supporting these policy directions is provided in Appendix A – Detailed Planning Rationale and Justification.

Comments Received

Comments from the Province focused primarily on administrative consistency and policy clarity. Key themes included updating terminology to reflect the Provincial Planning Statement, 2024, removing references to specific provincial ministries and municipal comprehensive reviews, and refining heritage policies to align with provincial definitions, legislation, and best practices. Provincial reviewers also encouraged greater clarity and flexibility regarding reconstruction of designated heritage properties following unforeseen events, clearer criteria for addressing demolition and loss, and revisions to ensure definitions and conservation approaches for cultural heritage landscapes are consistent with provincial policy and industry standards.

Comments from the Heritage Committee focused on the implementation and application of the proposed policies, including discussion on the process and timing for evaluating properties on the Heritage Inventory, approaches to adaptive reuse, and the evidentiary standards required to support demolition of heritage properties. Committee members also discussed the role of engineering assessments; the importance of conserving and interpreting heritage value following demolition and emphasized the need for public education and engagement to foster continued interest and support for heritage conservation.

Summary and Recommendations

While the existing cultural heritage policies of the Official Plan establish a strong commitment to conservation, experience applying those policies has identified challenges related to clarity, flexibility, and effective integration with the development review process. In particular, the largely procedural nature of the current framework has limited the County's ability to proactively manage change and achieve consistent conservation outcomes.

The proposed amendments integrate a series of refinements into a more cohesive, accessible, and outcomes-oriented policy framework that better reflects contemporary heritage planning practice. These changes represent an evolution in policy delivery rather than a departure from Council's previously adopted cultural heritage conservation objectives, and are intended to improve predictability, accountability, and implementation results.

The amendment aligns with provincial interests under the Planning Act, 1990 and is consistent with the Provincial Planning Statement, 2024, supporting the conservation of protected heritage property while accommodating growth and change. The proposed policies aim to reflect good planning practice by strengthening existing tools, improving alignment with provincial policy, and supporting the long-term conservation of the County's cultural heritage assets. Staff therefore recommend that Council adopt the amendment as drafted in Appendix C to this report.

Attachments

Appendix A – Detailed Planning Rationale and Justification
Appendix B – Comments Received
Appendix C – Draft Official Plan Amendment By-Law (OPA3-C-26)

Reviewed By

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Jeremy Vink, Director of Planning

Copied To

Dan Namisniak, Manager of Development Planning

By-law and/or Agreement

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| By-law Required | Yes |
| Agreement(s) or other documents to be signed by Mayor and /or Clerk | No |