

## **Provincial Comments Received**

The draft Cultural Heritage policies were circulated to the Province in October 2025, this attachment provides the comments received by the Provincial Ministries in the Table below. All comments were implemented into the policies submitted under this Official Plan Amendment.

Suggested Revisions to Draft Official Plan Amendment – to Implement the Planning Act and Provincial Planning Statement, 2024

OPA Policy Number	Comments / Concerns	Related Provincial Ministries	Reference to Planning Act, PPS or Provincial Plan Section or Policy	Proposed Revision
Entire OP	The County is encouraged to replace specific ministry names.	MMAH	Administrative	Replace any specific ministry names (e.g., “Ministry of Municipal Affairs and Housing,” “Ministry of Infrastructure”) with <b>“the Province”</b> .
Entire OP	The County should replace any reference to the “Provincial Policy Statement”.	MMAH	Administrative	Replace all references to the “Provincial Policy Statement” with <b>“Provincial Planning Statement”</b> or <b>“Provincial Policy”</b> .
Entire OP	To be consistent with the Provincial Planning Statement, 2024 (PPS), it is recommended that the County revise the draft OPA to change references to Municipal Comprehensive review.	MMAH	PPS/ Administrative	The County is encouraged to replaces all references to a “municipal comprehensive review” with a <b>“land needs assessment”</b> or <b>similar wording</b> .
Part 5-2.19.13	To ensure the reconstruction of a designated heritage property is appropriate, work should be guided by industry best practices and by technical studies such as Heritage Impact Assessment or Archaeological Assessment, as appropriate.	MCM	PPS Section 8 (definition of “Conserved”)	The County is encouraged to revise this policy so that it reads:  In the event a designated heritage property is partially or wholly destroyed due to fire, weather events, or other unforeseen circumstances, the County of Brant does not require that the structure be reconstructed in like kind and quality. This

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				<p>includes materials, architectural detailing, and construction techniques. While the County recognizes the cultural and historical value of heritage properties, we also acknowledge the importance of flexibility and practicality for property owners during times of hardship or loss. Owners are welcome to pursue reconstruction options that are more contemporary or cost-effective, provided they meet applicable building code requirements and any applicable planning approvals. Through the planning approval process, property owners are encouraged to work with Staff to ensure that the project is appropriate considering its cultural heritage value, <b>carried out in accordance with the Parks Canada Standards and Guidelines for the Conservation of Historic Places in Canada, and supported by technical studies such as Heritage Impact Assessment and/or Archaeological Assessment, as appropriate.</b></p>

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Part 5-2.19.15	It is unclear what “unavoidably lost or demolished” means in this policy, or how that would be determined. It is also recommended that some terminological revisions for consistency with legislation and industry practice be made to this policy.	MCM	PPS 4.6.1, 4.6.3, Section 8 (definition of “Heritage attributes”) OHA Part IV	<p>The County is encouraged to clarify the meaning of “unavoidably lost or demolished”.</p> <p>The County is also encouraged to revise clause (a) of this policy so that it reads: Preserving and displaying of <del>fragments</del> <b>remnants</b> of the former buildings’ <del>features</del> <b>and landscaping heritage attributes</b>;</p>
Part 5-2.19.18	The definition of cultural heritage landscape seems narrower than the definition found within the PPS.	MCM	PPS 4.6.1 and Section 8 (definition of “cultural heritage landscape”)	<p>The county is encouraged to revise the policy to read as:</p> <p>A cultural heritage landscape is a defined geographical area characterized by human settlement activities <b>or other cultural associations</b> that <b>may</b> have resulted in changes and modifications to the environment, which is now considered to be of <b>cultural</b> heritage value or interest.</p> <p>Cultural heritage landscapes may include distinctive rural roads, urban streetscapes, commercial main streets, rural landscapes including villages and hamlets, as well as commercial areas and industrial complexes.</p>