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**Date** March 18, 2025 **Report No.** 2025-44

**To** Chair and Members  
Committee of the Whole – Planning and Administration

**From** Nicole Wilmot  
Commissioner of Community Development

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### 1.0 Type of Report

Consent Item

Item For Consideration

### 2.0 Topic **Amendments to the Downtown and Greyfields Community Improvement Plans to Introduce Incentives for the Adaptive Reuse of Historic Properties (Files DCIP-01-25 and GCIP-01-25) [Financial Impact = None]**

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### 3.0 Recommendation

- A. THAT Report 2025-44, titled “Amendments to the Downtown and Greyfields Community Improvement Plans to Introduce Incentives for the Adaptive Reuse of Historic Properties (Files DCIP-01-25 and GCIP-01-25)”, BE RECEIVED; and
- B. THAT Amendment No. 2 to the Downtown Community Improvement Plan BE ADOPTED, and the implementing By-law, attached as **Appendix A** to Report 2025-44, BE APPROVED; and
- C. THAT Amendment No. 1 to the Greyfields Community Improvement Plan BE Adopted, and the implementing By-law, attached as **Appendix B** to Report 2025-44, BE APPROVED; and

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D. THAT pursuant to subsection 17(23.1) of the Planning Act, R.S.O. 1990, c. P.13, the following statement SHALL BE INCLUDED in the Notice of Adoption: “*Regard has been had for all written and oral submission received from the public before the decision was made in relation to this planning matter*”.

## 4.0 Executive Summary

Staff first reported to Council in 2023 about the potential for aligning heritage conservation with intensification and adaptive reuse goals. With Council direction Staff have prepared potential amendments to both the Downtown Community Improvement Plan and the Greyfields Community Improvement Plan.

This Report recommends that Council adopt Amendment No. 2 to the Downtown CIP and Amendment No. 1 to the Greyfields CIP to introduce housekeeping amendments and enhance an existing grant program to encourage the adaptive reuse and heritage designation of historic properties. The implementing By-law including the amendment and proposed changes to the Property Tax Increment-Based Grant Program for both the Downtown CIP and the Greyfields CIP are attached to this Report as **Appendix A** and **Appendix B** respectively.

Staff have consulted with other departments and with the Brantford Heritage Committee regarding the proposed changes and have received support for the changes. A statutory public meeting (held on March 18<sup>th</sup>) is required prior to Council formally making a decision respecting CIP amendments. A notice of public meeting was issued in the Civic News on Thursday, February 20<sup>th</sup> with a copy of the notice also published on the City’s website.

In accordance with Council’s direction, Staff has drafted amendments to both CIPs that would provide one additional year of funding (up to eleven years, from the standard ten) through the Tax Increment Based Grant Program where a project adaptively re-uses a designated heritage property, or a property with cultural heritage value that is then designated. This additional year of funding would be at the highest rate offered by the applicable stream, after which the standard ‘phase-out’ continues as normal.

## 5.0 Purpose and Overview

The purpose of this Report is to bring forward amendments to both the Downtown Community Improvement Plan and the Greyfields Community Improvement Plan for Council approval. These amendments will implement

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Council direction to enhance the existing Property Tax Increment-Based Grant Program by introducing financial incentives that support the adaptive re-use of designated heritage properties and other properties which are eligible for designation (e.g. listed on the Heritage Register). The amendments also update Provincial and municipal policy references in each community improvement plan.

## 6.0 Background

The Downtown Community Improvement Plan (CIP) and the Greyfields CIP were approved in June 2021. Both plans offer a Property Tax Increment-Based Grant Program to incentivize redevelopment projects that increase a property's assessed value.

The City of Brantford has also adopted a Heritage Grant Program under which owners of designated heritage properties can apply for financial grants to assist with maintenance and restoration projects. However, the Heritage Grant Program is not intended to act as a development incentive, and a property must be designated for the owner to receive the financial assistance.

Over the past two years, Council has approved various initiatives recommended by Staff to support heritage conservation in the City of Brantford, including enhancements to the Heritage Grant Program, exploring potential heritage conservation districts, and streamlining the heritage permitting process. Staff also identified the potential for aligning heritage conservation with intensification and adaptive reuse goals, as well as ways to encourage landowners to designate their property of cultural heritage value and interest. Staff first reported to Council with Report 2023-153, through which Council approved recommendation D on March 28, 2023: *"THAT Staff BE DIRECTED to report back to Council in Q4, 2023 regarding enhanced and/or additional financial incentive programs for owners of designated heritage properties as outlined in Report 2023-153;"*.

Staff subsequently reported back through [Report 2023-571](#), and on December 19, 2023, Council passed the following resolution:

- A. *"THAT Report 2023-571, titled "Enhancements to the City of Brantford Heritage Grant Program and Consideration of Adaptive Re-Use Incentives", BE RECEIVED; and*

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- B. THAT the necessary by-law to implement the recommended amendments to the City of Brantford Heritage Grant Program contained in Report 2023-571 BE PRESENTED to Council; and*
- C. THAT Staff BE DIRECTED to draft potential program amendments to the Downtown Community Improvement Plan and Greyfields Community Improvement Plan to introduce financial incentives to encourage adaptive re-use of designated heritage properties as outlined in Report 2023-571 and REPORT BACK to Council in Q2 of 2024.”*

In accordance with Council’s direction, Staff reviewed the two CIPs and identified matters within each CIP to be amended to best introduce incentives to encourage adaptive re-use of designated properties and non-designated properties with heritage value. Staff reported back to Council in [Report 2024-444](#) and on November 26, 2024 Council passed the following resolution:

- A. “THAT Report 2024-444, titled “Adaptive Re-use Incentives for Designated Heritage Properties using the Downtown and Greyfields Community Improvement Plans”, BE RECEIVED; and*
- B. THAT staff BE DIRECTED to prepare amendments to the Downtown and Greyfields Community Improvement Plans to implement the adaptive re-use incentives discussed in Report 2024-444.”*

Staff has prepared this Report to detail the necessary amendments and complete the formal process under the *Planning Act* for amending the Downtown and Greyfields CIPs to introduce the adaptive re-use incentives into the Property Tax Increment-Based Grant Program.

## **7.0 Corporate Policy Context**

### **7.1 2023-2026 Council Priorities**

The Community Improvement Plans (CIPs) contain financial incentive programs intended to facilitate development that aligns with goals for revitalization, intensification and affordable housing within the associated Community Improvement Project Areas (i.e. Downtown and Greyfield corridors). They support Strategic Themes 4, 5, and 9 in the 2023-2026 Council Priorities document.

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Strategic Theme 4 – “Create a vision and strategy for managing development and affordable housing”. The related priority action areas include:

- Diversification of housing – ensure that affordable housing with multi-use buildings is included in the overall growth plans for the City of Brantford, and ensure that low-income housing is distributed evenly across the City.
- Planning for Growth – Develop a policy for growth that is aligned with the City’s future Vision and Official Plan, ensure that the current and future needs of the majority of the community are met, and that it is considerate of current and future financial requirements.
- Considers Funding and Affordability – Ensure the City considers affordability, the funding requirements, and the ability to garner such funding in a way that imposes the least burden on the taxpayer.

Strategic Theme 5 – “Develop a planning and implementation schedule and commit resources for various projects related to City assets”. The relevant priority action area is:

- Heritage Designations – introduce programs that would encourage and incentivize property owners to designate their properties.

Strategic Theme 9 – “Commit to and implement the downtown revitalization plan and vision”. The relevant priority action area is:

- Vision for the Downtown – Articulate a future vision for the downtown core that will define the city and ensure that people want to spend time and invest there.

## **7.2 City of Brantford Official Plan**

The City of Brantford’s Official Plan is the overarching strategic plan guiding land use and development within the City of Brantford. Of the 10 Guiding Principles in the Official Plan, this Report aligns directly with Principles 3, 4, and 5:

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**Principle 3:** Brantford’s rich and diverse cultural heritage resources will be conserved and promoted to raise awareness of local history and provide points of interest that enhance residents’ and visitors’ experience of the City.

**Principle 4:** The Downtown will be recognized as a vibrant City Centre with a distinct, definable identity and a rich, balanced mixture of government and social services, post-secondary educational opportunities, shopping, businesses, housing options, entertainment and cultural activities for residents, students and visitors. High quality urban design will reflect the importance of this gathering place as the heart of the City.

**Principle 5:** New development achieved through intensification initiatives will focus on Strategic Growth Areas and will support the ongoing revitalization of the Downtown, mixed-use centres and mixed-use corridors. Intensification will be compatible with existing development patterns, while supporting an evolution to a more compact and transit-supportive urban structure.

In addition to the Guiding Principles, Section 3.4 of the Official Plan contains policies specific to the conservation of cultural heritage resources. Policy 3.4.f identifies the following as one of the methods for conserving cultural heritage resources: “*The offering of incentives to encourage and/or assist with the conservation, restoration and reuse of heritage resources, in accordance with the Ontario Heritage Act, the Municipal Act, or a Community Improvement Plan under the Planning Act*”.

## 8.0 Input From Other Sources

As noted in Section 6 (Background), this Report has been prepared in accordance with Council’s November 2024 direction respecting matters in [Report 2024-444](#). Report 2024-444, and preceding Reports ([2023-153](#) and [2023-571](#)), included consultation with Staff in other departments as well as the Brantford Heritage Committee. This consultation is summarized below.

### 8.1 Staff in Other Departments

The enhanced incentives to be incorporated into the Property Tax Increment-Based Grant Program to support adaptive reuse projects were developed by Planning Staff with the input of Staff in the Finance Department.

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## 8.2 Brantford Heritage Committee

Staff consulted the Brantford Heritage Committee with respect to adaptive reuse incentives when preparing Report 2023-571 and Report 2024-444. Comments from the Brantford Heritage Committee were included in the above mentioned reports. Input from the Brantford Heritage Committee was therefore considered in the drafting of the amendments to the Downtown and Greyfields CIPs that are presented in this Report.

## 8.3 Public Consultation

The amendment of a CIP follows the process to adopt or amend an Official Plan as set out in Section 17 of the *Planning Act*, accordingly, a statutory public meeting is required prior to Council's decision. A notice of public meeting was issued in the Civic News on Thursday, February 20, 2025 and published on the [City's website](#).

In addition to providing the notice of public meeting, Staff prepared tracked-changes versions of the two CIPs to highlight the amendments. The documents were published on the respective [Downtown CIP](#) webpage and the [Greyfields Revitalization Strategy](#) webpage. Direct links to these two webpages were included in the Civic News.

## 9.0 Analysis

### 9.1 Policy-related Housekeeping Amendments

The Downtown and Greyfields CIP documents include reference to enabling legislation in the *Planning Act* and the *Municipal Act, 2001* as well as other Provincial policies in effect. At the time that the Downtown and Greyfields CIPs were adopted by Council, applicable Provincial policies were the Provincial Policy Statement, 2020 ("PPS, 2020") under the *Planning Act* as well as A Place to Growth: Growth Plan for the Greater Golden Horseshoe ("Growth Plan"). As of October 2024, both the PPS, 2020 and the Growth Plan were repealed by the Province and replaced by a new Provincial Planning Statement, 2024 ("PPS, 2024"). Though the relevant policy language is generally similar between the repealed documents and the new PPS, 2024, Staff have taken the opportunity to update sections of both the Downtown (**Appendix A**, Section A.1.2) and Greyfields (**Appendix B**, Section A.1.2) CIPs to reflect the new PPS, 2024.

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Both CIPs also refer to applicable municipal policies; primarily, the City of Brantford Official Plan. When the CIPs were adopted, the current Official Plan (Envisioning Our City: 2051) was not yet in effect so the referenced policies reflected the old, now repealed Official Plan. As part of the housekeeping amendments, Staff have updated the policy references in both CIPs to the current Official Plan. These changes do not affect the scope, goals, or function of either CIP. The proposed changes can be seen in **Appendix A** (Section A.1.3.) for the Downtown CIP and **Appendix B** (Section A.1.3) for the Greyfields CIP.

## 9.2 Amendments to Program Goals

To support the changes to the Property Tax Increment-Based Grant Program in both the Downtown and Greyfields Community Improvement Plans, Staff has added language referencing the adaptive reuse of historic properties as follows:

- **Downtown CIP (Appendix A):**
  - Subsection B.2.2. (CIP Goals for Downtown Revitalization and Intensification)
  - Section B.3. (Property Tax Increment-Based Grant – Program Purpose and Objective)
- **Greyfields CIP (Appendix B):**
  - Section B.2.1. (The Vision for Greyfields Revitalization in Brantford)
  - Section B.2.2. (Target Greyfield Revitalization Area Goals)
  - Subsection B.3.2.1. (Property Tax Increment-Based Grant Program – Program Purpose and Objective)

## 9.3 Heritage Enhancement to the Property Tax Increment-Based Grant Program

As discussed in Reports 2023-571 and 2024-444, Staff has considered the existing structure and maximum grant amounts of the Property Tax Increment-Based Grant Program in both the Downtown and Greyfields Community Improvement Plans. The program is structured the same way in both CIPs, with one stream funding fully market-rate development and

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two streams to encourage the creation of affordable housing units, providing a larger grant for projects with more affordable units. The three streams are described below:

- **Revitalization Project Stream** (“baseline” stream, for market rate development):
  - Initial grant value (years one through five) is equivalent to 80% of the increase in property taxes post-redevelopment.
  - In years six and seven the grant value is equivalent to 60% of the increase in property taxes.
  - In year eight, the grant is equivalent to 40% of the increase in property taxes.
  - In years nine and ten, the grant is equivalent to 20% of the increase in property taxes.
- **Affordable Housing Revitalization Project - Tier 1 Stream** (20% of units are rental units that are rented at equal to or less than 80% of the Average Market Rate (AMR)):
  - Initial grant (years one through five) is 90% of the increase in property taxes post-redevelopment.
  - In years six and seven the grant value is equivalent to 70% of the increase in property taxes.
  - In year eight, the grant is equivalent to 50% of the increase in property taxes.
  - In years nine and ten, the grant is equivalent to 30% of the increase in property taxes.
- **Affordable Housing Revitalization Project - Tier 2 Stream** (10% of units are rental units rented at equal to or less than 80% of the Average Market Rate, and another 10% of units are rented at equal to or less than 60% of the Average Market Rate):
  - The grant for this program stream is equivalent to 100% of increased property taxes for ten years.

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In accordance with Council's direction, Staff have drafted amendments to provide an additional year of funding (up to eleven years) at the highest rate offered by the applicable stream after which the standard 'phase-out' continues as normal. The three streams with a heritage enhancement would function as follows:

- **Revitalization Project Stream with heritage enhancement** (market rate development):
  - Initial grant value (years one through **six**, instead of one through five) is equivalent to 80% of the increase in property taxes post-redevelopment.
  - In **years seven and eight** the grant value is equivalent to 60% of the increase in property taxes.
  - In **year nine**, the grant is equivalent to 40% of the increase in property taxes.
  - In years **ten and eleven**, the grant is equivalent to 20% of the increase in property taxes.
  
- **Affordable Housing Revitalization Project - Tier 1 Stream** (20% of units are rental units that are rented at equal to or less than 80% of the Average Market Rate (AMR)) **with heritage enhancement**:
  - Initial grant (**years one through six**, instead of one through five) is 90% of the increase in property taxes post-redevelopment;
  - In **years seven and eight** the grant value is equivalent to 70% of the increase in property taxes.
  - In **year nine**, the grant is equivalent to 50% of the increase in property taxes.
  - In **years ten and eleven**, the grant is equivalent to 30% of the increase in property taxes.
  
- **Affordable Housing Revitalization Project - Tier 2 Stream** (10% of units are rental units rented at equal to or less than 80% of the Average Market Rate, and another 10% of units are rented at equal to or less than 60% of the Average Market Rate) **with heritage enhancement**:

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- The grant for this program stream is equivalent to 100% of increased property taxes for all **eleven years** that grant payments could be received.

The description of the program has been updated in Section B.3, tables 1 and 2 of the Downtown CIP (as shown in **Appendix A**) as well as Section B.3. Table 1 and subsection B.3.2.4 Table 2 in the Greyfields CIP (as shown in **Appendix B**).

## **9.4 Amendments to Program Criteria**

### **9.4.1 Downtown Community Improvement Plan**

The following program criteria have been amended or added with respect to the proposed heritage enhancements to the Property Tax Increment-Based Grant Program and can be seen in **Appendix A**:

- Projects which adaptively reuse a property with cultural heritage value can include 15% of the fees charged by heritage consultants as part of the eligible costs, in addition to architect, engineer, or planning consultant fees which can be included. (Subsection B.3.5)
- Projects that adaptively reuse a property with cultural heritage value must be designated under the *Ontario Heritage Act* prior to issuance of grant payments. (Subsection B.3.8.)
- A new criterion requiring that cultural heritage value and sufficient heritage attributes (physical features, such as architectural details, which contribute to cultural heritage value) be retained so that the property can meet the requirements of the *Ontario Heritage Act* with respect to designation. (Subsection B.3.15)

### **9.4.2 Greyfields Community Improvement Plan**

The following program criteria have been amended or added with respect to the proposed heritage enhancements to the Property Tax Increment-Based Grant Program and can be seen in **Appendix B**:

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- The description of eligible costs has been aligned with the description found in the Downtown CIP, for consistency in interpretation. The ability to include 15% of heritage professional's fees towards eligible project costs has also been added. (Subsection B.3.2.2.)
  - Projects that adaptively reuse a property with cultural heritage value must be designated under the *Ontario Heritage Act* prior to issuance of grant payments. (Subsection B.3.2.5.)
  - The eligibility criteria have been expanded for properties with cultural heritage value, and such projects are not required to be mixed-use in nature. (Subsection B.3.2.6., criterion 1)
  - A new criterion requiring that cultural heritage value and sufficient heritage attributes (physical features, such as architectural details, which contribute to cultural heritage value) be retained so that the property can meet the requirements of the *Ontario Heritage Act* with respect to designation. (Subsection B.3.2.6. criterion 5)

## 9.5 Preferred Strategies for Adaptive Reuse Projects

In Report 2024-444 Staff detailed recommended strategies for adaptive reuse that should be the focus of the enhanced Tax Increment-Based Grant Program in both CIPs. Adaptive reuse projects should align with a scope that is one of “continuation” of the historic use (or a similar one); “retention and addition” to historic buildings; or “conversion” of a building to a new use and form while retaining many of the heritage attributes. Staff proposes that a new appendix be included in each CIP to outline these project types, to function as a reference guide when considering projects for the enhanced funding. The proposed new appendix would be “Appendix C” to the Downtown CIP (refer to **Appendix A** to this Report) and “Appendix D” to the Greyfields CIP (refer to **Appendix B** to this Report.)

## 10.0 Financial Implications

There are no financial implications arising from this Report.

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The proposed amendments to the Property Tax Increment-Based Grant Program in both Community Improvement Plans will be funded by increased property taxes on the applicable properties. Staff will detail the financial implications for a given application when the application-specific grant report is submitted for Council's consideration.

## 11.0 Climate and Environmental Implications

There are no quantifiable climate and environmental implications associated with this Report; however, the adaptive reuse of historic buildings will result in less material being sent to the landfill.

## 12.0 Conclusion

This Report recommends the approval of Amendment No. 2 to the Downtown CIP and Amendment No. 1 to the Greyfields CIP which will enhance the existing Property Tax Increment-Based Grant Program and update Provincial and municipal policy references in each CIP. Planning Staff is of the opinion that these amendments can be used to encourage the adaptive reuse and heritage designation of historic properties and contribute towards the Downtown Priority Plan and the Greyfields Revitalization Strategy.



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Attachments:

Appendix A: Amendment to the Downtown Community Improvement Plan

Appendix B: Amendment to the Greyfields Community Improvement Plan

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In adopting this report, is a by-law or agreement required? If so, it should be referenced in the recommendation section.

By-law required  yes  no

Agreement(s) or other documents to be signed by Mayor and/or City Clerk  yes  no

Is the necessary by-law or agreement being sent concurrently to Council?  yes  no