

Development Permit System Policy Development in Ontario:  
Factors that Contribute to Implementation

MPA Research Report

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Natalie Stopar  
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## **Abstract**

In 2007, the province of Ontario introduced a new planning tool called the Development Permit System (DPS) in order to increase the efficiency, certainty, and scope of the planning system (MMAH, 2007). Despite these stated benefits, the system has only been implemented in four municipalities within Ontario. In addition, there has been very limited literature to date that assesses the new system and explains why it continues not to be implemented. As the DPS has the potential to greatly reform the planning system in Ontario, it is important to determine which factors are contributing to the implementation of the system in some communities but not others. This information would allow the province in order to better understand the barriers to the implementation of the DPS legislation. Furthermore, Ontario municipalities could benefit from this information as they begin to consider and evaluate the system.

In order to uncover what factors could be limiting implementation in some communities but encouraging implementation in others, case studies were conducted in five municipalities. These communities included the Township of Lake of Bays which was the first municipality to implement the system, the Township of Mulmur and the City of Kitchener that have decided not to implement the system, and the Town of East Gwillimbury and the City of Hamilton that have been strongly considering implementing the system. An interview was conducted with a municipal planner in each of these municipalities in order to better understand how the municipality came to the decision to implement the DPS or not, and what factors could have contributed to their decision. These findings were then analyzed with the assistance of academic literature on public policy change and decision making in order to better explain the contributing factors and the implementation of the system to date.

The analysis showed that the key factors limiting implementation could be attributed to: a lack of a DPS policy sponsor or advocate within the municipality, the absence of a complex

policy problem for the DPS to address, a general contentment with the current planning system, the risk adverse nature of municipalities, and a lack of knowledge on the DPS. Contrary to academic literature, the size and structure of municipal planning departments was found not to have an impact on whether a municipality implemented the system.

Lastly, an analysis of the municipalities who have implemented the DPS in relation to policy transfer and diffusion literature, found that current implementation of DPS in Ontario is largely occurring in communities with similar structures, policy problems, and which are in competition with each other. While this similarity is only found in three small communities who have implemented the system, it does provide some optimism that once DPS policies are adopted by larger municipalities, these same policy diffusion factors will encourage other municipalities to implement the DPS. In addition, policy transfer and diffusion literature identifies that more communities could be encouraged to implement the system if the knowledge and experience of communities who have implemented the DPS were better communicated to other municipalities. This would not only increase the knowledge of municipal planners about the system, but could provide further support for advocates of the system in other municipalities while addressing the concerns of the system.

Despite the limitations to these findings, including the limited number of case studies, these conclusions help increase the understanding of factors preventing the implementation of the DPS and what can be done to address these factors. These recommendations will of use to the province on how to further encourage implementation of the system, and will provide greater information to municipal planners about how other municipalities are viewing the system.

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## **Chapter 1: Introduction**

The Development Permit System (DPS) is a new planning tool that was introduced in Ontario in 2007 and has the potential to greatly affect how planning policy is implemented across the province. This new tool is meant to be used in place of traditional zoning and is deemed to be more flexible, efficient, and better equipped to manage more complex planning problems, including brownfield redevelopment and intensification (MMAH, 2007). As more municipalities begin to consider and implement the system, it is important to assess this new policy and how it is implemented in the province. Although it is difficult to assess the impact of new development permit policies today due to their limited implementation, a review of these policies, in addition to speaking to municipal planners, increase our understanding about which municipalities are using the system and why other are not. This will help to improve our understanding about what factors are leading to the implementation of the system in some communities but not others. Assessing this policy process can not only assist the province to better understanding how the new tool is being used, but can give municipalities a better understanding about how the system could be implemented within their own unique contexts. This research can help the province and municipalities to be more aware about how development permit policies across the province are being implemented and to provide some insights about how to improve these policies or implementation in the future.

This paper will first provide an overview of the DPS legislation in relation to traditional zoning by-law framework in order to better understand the difference between the two systems and the municipal decision that needs to be made. Five municipal case studies with then conducted in municipalities which have decided to implement or not implement the DPS. This will determine what factors contributed to their decisions. These municipalities were assessed through a review of their planning documents and interviews with municipal planners. This

evaluation of the municipal policy and decision making process regarding the DPS can help to increase our understanding of how and why the system is being chosen and used by some municipalities and perhaps not others. In addition, this information could be used in subsequent studies that assess the development permit legislation at the provincial level.

Due to the limited implementation to date, this paper will not be assessing whether or not the DPS has achieved its objectives, but rather providing a comparison of why some municipalities are choosing to use the system and how they are using the system and others not. Once the DPS has been more widely implemented, a subsequent analysis should be conducted which focuses on the implementation of the system and its successes and failures. In order to properly assess the development permit policy process, the policy analysis framework, as outlined by Leslie Pal, will be used (2014). This will be done by assessing the policy problem or opportunity municipalities hoped to address, the policy decision that was made, and how this new policy has been implemented (Pal, 2014).

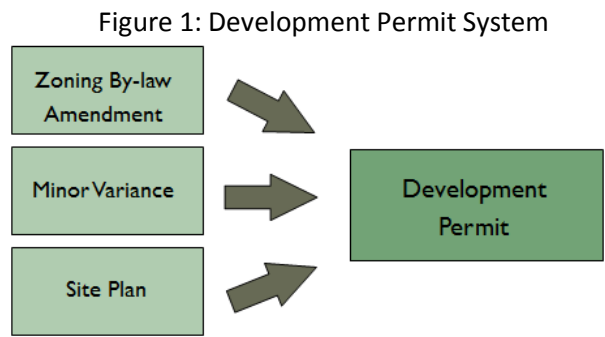
The following four chapters will provide background on the DPS, the municipal case studies, the methodology used, and the findings from the research. These findings were evaluated in conjunction with public policy academic literature in order to explain the policy decision made by the communities. Lastly, recommendations will be made in order to provide the province with suggestions regarding how to increase the adoption of the new system as well as thoughts for further research.

## **Chapter 2: Understanding the Development Permit System**

### **2.1 Introduction to the Development Permit System**

In 2007, the province of Ontario gave municipalities the ability to implement the Development Permit System (DPS) within their communities (MMAH, 2007). Municipalities can now choose to implement planning policy through the use of traditional zoning by-laws or

through the new DPS. The goal of the DPS is to make the planning system more effective by consolidating zoning, site plan, and minor variance applications into one application (MMAH, 2007). This is done by reducing the amount of time to process applications, providing more flexibility for land uses and development standards, and by enhancing municipalities' abilities to protect the environment and create healthy communities (MMAH, 2007b). In addition, the combination of these planning applications gives municipal planners the ability to consider all aspects of the proposal in one application, which can contribute to a better planned development.



(MMAH,2007)

The initial push to implement the DPS into Ontario came from the development community that was frustrated by the time and cost of obtaining planning approvals in the province (Sewell et al., 1993). In addition, similar versions of the system were already being successfully used by other provinces, primarily British Columbia, Alberta, and Saskatchewan (Sewell et al., 1993 & MMAH, 2007b). Prior to the implementation of the DPS into the *Planning Act*, the Ontario Ministry of Municipal Affairs and Housing conducted a pilot project for five communities to assess the effectiveness of the system and identify any issues prior to implementation (MMAH, 2011; *Planning Act, R.S.O. 1990*). These municipalities included the Township of Lake of Bays, the Region of Waterloo, and the cities of Hamilton, Oakville, and Toronto (MMAH, 2011). Out of this pilot project, the Township of Lake of Bays was the only



municipality to chose to implement the system (MMAH, 2007b). Despite the limited implementation, the province reported that each of the other pilot municipalities also supported the DPS system as a new planning tool, and their input was used in the final DPS regulation (MMAH, 2011).

When considering whether to implement the new DPS or to continue to use traditional zoning, municipalities will need to consider the differences between the systems. Public policy analysts Thissen and Walker note that in order to properly assess public policy, policy analysis must acknowledge the different values that various policy problems and actors can have (2013). In this regard, it is important to highlight the variations that exist between traditional zoning and the DPS in order to better understand how these differences in values could drive municipal decision making to implement or not implement the DPS. An analysis of the two implementation tools found that the main differences between the two systems are efficiency, certainty, and scope.

The first difference between the traditional zoning planning system and the new DPS system is efficiency. Not only does the DPS consolidate zoning by-law, site plan control, and minor variance applications into one, but new DPS legislation requires that municipalities process a completed application within 45 days (O.Reg 608/06). This can greatly reduce the time needed for new developments to obtain planning approvals, which under the current planning process can take several months (MMAH, 2007c).

The DPS can also increase certainty by reducing the chance of appeals to the Ontario Municipal Board (OMB) and the number of amendments to the development permit by-law. Zoning was originally designed with the intention that once it was implemented, development could occur with minimal intervention (Makuch et al., 2004). Many developments today, however, are much more complex as a result many issues including mixing land uses,

environmental concerns, and increasing standards of urban design. This can result in many developments requiring an amendment to the zoning by-law, either through a minor variance application or a more detailed zoning-by-law amendment under the *Planning Act*. This can not only significantly increase the time required to process planning applications, but can also decrease certainty in the planning process. In contrast, the DPS has the potential to increase certainty by reducing the number of amendments to the by-law through the requirement to use minimum and maximum standards for development and can set out a range of variations for these standards (*O.Reg 608/06*). This greater flexibility and range of possibilities within the documents allows new developments the ability to adjust design features which better meet the specific circumstances of the site, which can reduce the number of amendments required and increase certainty (MMAH, 2008). In addition, once a development permit by-law has been approved and is in force and effect, Council or the delegated authority's decision to approve or not approve a development permit application can only be appealed by the applicant (*O.Reg 608/06*). The removal of the public's right to appeal increases certainty for the development community that development permits will be approved if they meet the conditions specified in the by-law.

The last difference between the two systems is scope. In many ways the scope of zoning by-laws and development permit by-laws remains the same. However, under a development permit by-law, municipalities can also regulate the removal of vegetation, the protection of water, and the monitoring of environmentally sensitive lands. The by-law can also require improvements to the public spaces surrounding buildings such as new landscaping and street furniture (MMAH, 2007c). These supplementary powers can increase the scope of planning policies to better enhance and protect the urban environment (MMAH, 2007c).

These key differences between development permit by-laws and zoning by-laws could impact whether or not municipalities choose to implement the DPS. For example, if municipalities have a particular problem in regards to environmental protection, they might be more inclined to implement the system than other municipalities. In addition, if a municipality already feels they have an efficient planning process, they might also be less inclined to implement the system. These contextual factors are important to identify when analyzing the use of the DPS in Ontario.

## **2.2 Development Permit System Literature Review**

The majority of the literature on the DPS is produced by the province and by a few academic and legal sources, all of which have a positive outlook for the new system. The Ministry of Municipal Affairs and Housing (MMAH) is the primary provincial branch responsible for planning policy in Ontario and has created many documents that outline some the main objectives and benefits of the DPS (MMAH, 2007a,b,c). In addition to the literature provided by the province, there have been two scholarly articles written about the DPS in Ontario, each of which again highlights many of the benefits of the system, and provides theories regarding why it has not been widely implemented to date.

The first academic research regarding the DPS was conducted by Joe Nethery, a master's student at The University of Western Ontario. The focus of his research was on the organizational constraints that could limit the implementation of the system in Ontario municipalities (Nethery, 2011). Through his research, he found the DPS could have been poorly implemented due to a lack of knowledge among professional planners, a lack of challenging development proposals that could benefit from the development permit system, and a large proportion of municipalities with small populations (Nethery, 2011). In addition, he also concluded that the DPS has not been widely implemented because many municipalities have

limited development challenges and thus have little need for the system (Nethery, 2011). While his research was non-conclusive, it did provide some valid theories that begin to explain why the DPS is still not widely implemented.

Another research report on the DPS was completed by a Ryerson University master's student in 2012 (Keenan, 2012). This paper suggests the DPS system would be ideal for implementing complex policies regarding mobility hubs because of its increased flexibility and faster approval process (Keenan, 2012). He also suggested, similarly to Nethery, that the limited implementation of the DPS was primarily caused by a lack of knowledge by planning professionals about how the system worked. These reports are very reminiscent of other development permit literature which focuses on the positives of implementing the development permit system (Nethery, 2011; MMAH, 2007). Other than these two reports, there has been very little academic research done that critically analyses the development permit system. In addition, almost all of the current literature regarding the DPS focuses on the positive outcomes associated with the new system and primarily focuses on organizational reasons why the new development tool has not been successful.

### **2.3 How to Implement the Development Permit System**

In order to implement the DPS, municipalities must establish development permit policies within their Official Plans and subsequently pass a development permit by-law (O. Reg 608/06). These Official Plan policies must clearly identify the development permit area and the municipality's goals and objectives for the area (O Reg 608/06). Planning policies in Ontario are primarily developed by municipal planning staff or private planning consultants in discussion with the public and must be approved not only by their Municipal Council, but also their approval authority. The approval authority can vary greatly depending on the form of government. For example, lower-tier municipalities must often have their planning policies

approved by upper-tier and regional government, and many single-tier governments must receive approval from the Ministry of Municipal Affairs and Housing (MMAH, 2013). In addition, many small municipalities, particularly those in Northern Ontario, have their municipal planning services administered by provincially created Planning Boards, with the final approval authority being the province (Makuch et al., 2004). These similarities and differences in policy development and approval are important to recognize when comparing policy implementation across various municipalities.

The presence of the Ontario Municipal Board (OMB) also plays a significant role in the approval and implementation of planning policy, as a variety of planning policies and decisions can be appealed to the Board with limited opportunities for further appeals. While the presence of the OMB is greatly debated in Ontario, the impact that the OMB will have on the interpretation of development permit policies and by-laws within Ontario is yet to be seen. To date, there have been no significant cases that have discussed development permits in Ontario. The presence of this board, however, should be acknowledged because its existence can greatly impact how planning policies are utilized in Ontario.

Lastly, other stakeholders, such as local politicians, the public, and the development industry, will also play a large role in determining if, where, and how, to implement the DPS. For example, while local politicians and staff will play a large role in determining where to implement the DPS within the community, the public and the development industry will also have an influence on the this policy is written. It is important to identify all the actors involved in the creation of development permit policies as this might play a significant role in their outcome.

## 2.4 Municipal Implementation of the Development Permit System

An assessment of 293 municipal Official Plan's in Ontario was undertaken in order to determine to what extent each municipality has considered the DPS. Based on this analysis, the municipalities were then divided into four categories which included those that have:

- no mention of DPS
- chosen not to implement the DPS
- chosen to consider implementing the DPS
- have fully implemented the DPS through a development permit by-law.

A summary of the results of the analysis can be found in Table 1 below, and the detailed analysis can be found in Appendix A.

Table 1: Municipal Implementation of the Development Permit System

	Number of Municipalities	Percentage of Municipalities
No Mention of DPS	252	86%
Chosen not to Implement DPS	30	10%
Considering DPS	7	2%
Implemented DPS	4	1%
Total	293	100%

The first category describes the municipalities that have made no mention of the DPS within their Official Plans. While some of these municipalities might have made a reference to the development permits under the *Niagara Escarpment Planning and Development Act* and the *Aggregate Resources Act*, they were not included in this category because no reference was made to development permits under the *Planning Act (Aggregate Resources Act, R.O.S 1990; Niagara Escarpment Planning and Development Act; R.S.O. 1990; Planning Act, R.O.S. 1990)*.

The next category included municipalities that have chosen not to implement the DPS. These municipalities made a reference to the DPS under the *Planning Act*, but made no reference to where and how the DPS is to be used within the municipality. Many of these

Official Plans contained similar policies stating that the municipality would have the ability to implement the DPS in the future if they desired. These municipalities were categorized as 'chosen to implement' because while their Official Plans did contain some reference to the DPS, these references seemed to only be symbolic in nature as there was no real intention shown to implement the system. Rather it can be assumed that these municipalities knew about the DPS, but for whatever reason, chose not to implement the system.

The municipalities that were included under the 'considering the DPS' category were those whose Official Plans contained more detailed or draft policies pertaining to the DPS, including where and why the DPS should be implemented in the community. While these municipalities have not fully implemented the system through a development permit by-law, these policies show a clear intent to consider or implement the DPS in the future. Lastly, the few municipalities found in the 'Implemented DPS' category, are those that have fully implemented the DPS through a development permit by-law.

### **Chapter 3: Methodology & Theoretical Framework**

#### **3.1 Research Methodology**

Information was collected on what factors can affect the implementation of the development permit system by conducting interviews with municipal planners, analysing municipal planning documents, and relating these findings to literature on public policy change. In order to better assess the differences between municipalities that have chosen to implement and not implement the DPS, case studies were conducted in five municipalities: the townships of Mulmur and Lake of Bays, the Town of East Gwillimbury, and the cities of Kitchener and Hamilton. In addition, the City of Brampton and the Towns of Carleton Place and Gananoque were also briefly assessed, as they are two of the few municipalities in Ontario that have fully implemented the system.

A qualitative research method was used in order to gain a greater insight on the many factors that can influence a municipality's decision to implement the DPS or not, and add new perspectives to the existing discussion that haven't been previously discussed. The research was primarily driven by the perspectives of municipal planners with knowledge about the policy process within their communities, as well as their department's perspective on the development permit system. Although these findings are difficult to generalize, they provide insight into the types of factors that can influence a municipality's decision to implement the system, and potential flaws and challenges with the system (Lapan et al, 2014).

Planners were selected as the primary information source because they have the most knowledge of the planning challenges their community's face, and of the policy process and development of planning policy in the town. Furthermore, planners have the most knowledge of the decision making regarding the DPS in their communities. Planners who were contacted were highly involved in the Official Plan policy development within their communities. This ensured they had the greatest amount of knowledge in the policy decision making that was occurring at that time.

The main challenges with the research included the limited time to collect and analyze the data, the long time frame between the initial introduction of DPS policies in Ontario and present day, and the unavailability of some municipal planners to participate in the research. Research was conducted over a short period of four months that limited the number of municipal case studies that could be included in the research. In addition, the length of time between when DPS policies were implemented and originally considered in municipalities became a challenge because some of the planners involved had forgotten about some aspects of the discussions at the time, and some key members have since left the municipality. Lastly, only one of the four municipalities that have currently implemented the DPS had municipal



planners who were available to participate in interviews. While these municipalities' policy documents were still assessed, the lack of an internal perspective made it difficult to assess the decision making within those communities.

### 3.2 Municipal Case Studies

Case studies are used to examine single examples in more depth (Lapan et al., 2012). This helps to better uncover what contextual factors can impact a municipality's decision to implement the system. Municipal case studies were selected based first of a set of criteria including the size of the municipality and to what extent they have considered the DPS. A large and a small municipality were then chosen from the three categories presented in table 1. This includes those who had chosen not to implement the DPS, those who are considering the DPS, and those who have implemented the DPS. The municipalities that were selected for the case studies included the Township of Mulmur, the City of Kitchener, The Town of East Gwillimbury, the City of Hamilton and the Township of Lake of Bays. The references for these municipalities and interviews for each municipal planner are summarized in table 2.

Table 2: Municipal Case Studies & Planner Interviews

Name	Population (2011)	Municipal Structure	Municipal Planner Interview Reference
<b>Chosen Not to Implement DPS</b>			
Township of Mulmur	3,391	Lower Tier	Planner #1
City of Kitchener	219,153	Lower Tier	Planner #2
<b>Chosen to Consider Implementing DPS</b>			
Town of East Gwillimbury	22,473	Lower Tier	Planner #3-Previous Planner Planner #4-Current Planner
City of Hamilton	519,949	Single Tier	Planner #5
<b>Implemented DPS</b>			
Township of Lake of Bays	3,284	Lower Tier	Planner #6

(Statistics Canada, 2011 Census of Population)

Municipalities for each category were then chosen for interviews based on their unique contextual features as well as interesting wording in their official plans. Five municipalities out

of the three categories were available for interview. The last category, a mid size municipality which had implemented the DPS was unable to be filled because only one municipality in Ontario currently represents that category and its planners were unavailable for an interview.

### **3.2.1 Township of Mulmur**

The Township of Mulmur is small rural community located in central Ontario, just north of the Greater Toronto Area. As the smallest community to participate in the study, it offered a unique perspective of the factors that could discourage a primarily agriculturally based community from implementing the DPS (Mulmur, 2012). A portion of the township is also protected by the Niagara Escarpment Plan which is regulated by the Niagara Escarpment Commission, as well as the Nottawasaga Valley Conservation Authority. The Township was chosen for this study because the Official Plan for the community, which was approved by the Ministry of Municipal Affairs and Housing in 2012, contains specific wording against the implementation of the DPS for the Township at this current time (Mulmur, 2012). This was unlike the wording in many other municipal Official Plans that typically outlined that the municipality could implement the DPS under the Planning Act if desired. This clear intent not to implement the DPS highlighted the Township as an appropriate candidate for investigation.

### **3.2.2 City of Kitchener**

The City of Kitchener is a mid-sized municipality located just outside of the Greater Toronto Area (GTA). It is the largest municipality in the Region of Waterloo that is expected to grow by another 80,000 by 2031 (Kitchener, 2014). As a growing community that will continue to see employment and residential growth as well as significant transportation investments over the next years, the city's perspective on the DPS will shed some light on why the DPS is not being considered by many similarly sized cities in Ontario. Currently, the city's Official Plan

contains only symbolic policies regarding the DPS that say the municipality can implement the system in part, or entirely in the future if it desires (Kitchener, 2014).

### **3.2.3 Town of East Gwillimbury**

The Town of East Gwillimbury is a small and primarily rural community, located within the GTA. Approximately 75% of the Town's area is protected by the Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan from significant development (East Gwillimbury, 2010). The remaining portion of the town is designated as community areas for residential and commercial uses and a variety of new employment areas along the Highway 404 extension through the municipality (East Gwillimbury, 2010). The Town is unique in that it is one of the few municipalities currently considering implementing the DPS within the community. The Town's Official Plan proposes that DPS could be implemented within the Oak Ridges Moraine and Employment areas of the municipality (East Gwillimbury, 2010). Lastly, it is important to note that two planners were interviewed from the Township. This includes both the past planner for the Township who originally implemented the DPS policies into the Official Plan and who now works in a different department of the municipality, as well as the current Planner who will be one of players in determining if a DPS by-law will be implemented for the community.

### **3.2.4 City of Hamilton**

The City of Hamilton is a mid-size municipality located within the Greater Toronto and Hamilton Area (GTHA). It was chosen as a case study because it was one of the original DPS pilot municipalities selected and its Downtown Area Secondary Plan Contains specific policies regarding where the DPS is to be implemented in the downtown area (City of Hamilton, 2004). Despite these detailed policies regarding how the DPS is to be implemented in the community, to date no development permit by-law has been proposed. In addition, the city is currently

undertaking a review of this policy document that will include a review of the DPS policies (City of Hamilton, 2012). As a growing community with both urban and rural areas that has spent a significant amount of time evaluating how the DPS would work in the community, an analysis of the City of Hamilton's experience and future with the DPS will provide unique and insightful information about the system in Ontario.

### **3.2.5 Township of Lake of Bays**

The Township of Lake of Bays was the only pilot municipality to implement the DPS and the first municipality to implement the DPS in Ontario. The province of Ontario chose the Township as a pilot municipality for the DPS in order to evaluate how the system would work in waterfront areas (Lake of Bays, 2006b). The development permit by-law was enacted in 2006 for all waterfront properties in the community in order to increase the protection of the shorelines and to streamline the planning process (Lake of Bays, 2006). In addition to increasing the protection of shoreline areas, the DPS was implemented in order to streamline the existing process and to increase transparency regarding permitted waterfront developments for the community (Lake of Bays, 2006b). As the first municipality to fully implement the system in Ontario, the Township of Lake of Bays provided unique information about which factors lead to the implementation of the new system.

### **3.3 Theoretical Framework**

The theoretical framework that was used to guide the research included academic literature regarding policy processes, policy change, and municipal decision making. This literature has provided a framework that has helped to better assess and explain the findings of the research by contributing thoughts about how public policies change over time. Much of this literature agrees that public policies typically only change incrementally over time and are relatively stable, with relatively few large scale changes to existing policies (True et al., 2007). It

is uncommon for governments to introduce large policy changes (Baumgartner, 2013; Samuelson & Zeckhauser, 1988; Mintrom & Norman, 2009). According to this literature, the DPS would be considered a large scale change in the existing planning policy process as it would significantly alter the existing zoning by-law process, which has only incrementally changed over the past decades.

This literature includes many different academic perspectives about which factors can contribute to this significant policy change. These potential factors include the lack of a policy sponsor or policy entrepreneur, the absence of a specific policy problem or opportunity, the risk adverse nature of many public organizations. This includes a preference for the status quo, and theories on policy transfer and diffusion (True et al., 2007; Berry & Berry, 2007; Samuleson & Zeckhauser, 1988; Dolowitz & Marsh, 2000; Nykiforuk et al., 2008). In addition, other factors that were evaluated include the size and structure of municipalities, being content with the current system, as well as a lack of knowledge on the DPS. These different perspectives will be discussed in more detail in the following chapter in order to further analyse and explain the findings.

#### **Chapter 4: Findings and Analysis**

Once the municipal planner interviews were conducted, the data was analyzed by classifying findings into themes and then analyzing the data in conjunction with academic literature. The themes include the size of municipalities, policy sponsors, policy problems and opportunities, contentment with the current system, the risk adverse nature of municipalities, the lack of knowledge of the DPS, and the policy transfer and diffusion. The similarities and differences between each of the municipal case studies were identified in order to better understand how variations in each can impact a municipality's decision to implement the DPS or not.

#### **4.1 Municipality Size & Structure of Department**

Some literature regarding policy adoption suggests that organizations that are larger in size are more likely to be innovative due to the greater resources, skills, and ideas available to them (Berry & Berry, 2007; Walker, 2006). In order to determine how the size of a municipality could impact their decision to implement the DPS or not, three small, and two mid-size communities were assessed in case studies. In addition, the structure of each municipality's planning department was also assessed in order to see how these varied along with the size of the municipality. The structure of the department is also important to recognize and it could impact how policies are developed within the community.

An analysis of the case-study municipalities as well as the four municipalities that have currently implemented the DPS reveals that contrary to academic literature, smaller municipalities seem more likely to implement the DPS than larger municipalities. Out of the four municipalities that have currently implemented the system, three, the Town of Gananoque, Carleton Place, and Lake of Bays, have populations under 10,000 people (Statistics Canada, 2011). In addition, interviews with municipal planners revealed that the DPS is being more strongly considered in the Town of East Gwillimbury than in the City of Hamilton. While a variety of other factors that will be discussed below could have contributed to these smaller municipalities being more likely to adopt the DPS, the trend is different than what would be expected.

Each municipality interviewed also discussed the size of their municipal planning departments and how planning policies were generally developed within their communities. There was a significant difference in the size and structure of municipal planning departments in small and mid-size communities. Each town and township typically had a planner employed who would process all of the various planning applications for the town and develop new policies,

whereas the mid-size municipalities had multiple planners employed who would specialize in different planning themes such as development application approvals and policy development. Smaller municipalities would also hire consultants more often to provide greater background information to assist in policy development.

For example, while planners in the Town of East Gwillimbury also authored the majority of their Official Plan, the municipality used consultants for background research such as the growth management projections. While the Township of Mulmur, the smallest case study municipality, had hired a private part-time consulting Planner to process the Townships' planning applications and develop policies, the Township also has a Planning Advisory Committee that reviews planning applications and makes recommendations to Council, which is comprised of five members including the municipal Planner and a member of Council (Mulmur, 2014; Planner 1).

The Township of Lake of Bays similarly currently has a small department consisting of one planner and two support staff. The Township is currently conducting a review of its existing Official Plan and has hired consultants to do so. During the time of implementing the development permit system, however, the Township was contracting out its planning services to the District of Muskoka. When a call for pilot municipalities was given by the province, the township responded by signing an agreement with the district to implement the project. The implementation of the pilot project was then led by the District of Maskoka, with little involvement from the province (Planner 6).

The structure of planning departments in mid-sized communities is very different than the structure of small communities which often have one or more planners who work on a variety of different planning applications and policy analyses as they arise. Instead, municipalities such as Kitchener, divided their planning departments into sections which often

include policy development applications, and in Kitchener's case, site plan control. The structure of planning departments could be a factor that contributed to the limited implementation of the DPS in mid size communities. Currently, most of these municipalities are structured to develop policies and implement policies in two separate sections. This could make it difficult to accommodate the DPS within the structures of these municipalities, as the DPS is an implementation tool which models a policy document over a zoning by-law.

Lastly, it is important to note that all of the Planners interviewed, except for the Lake of Bays, said that the initial decision to implement new policies such as the DPS would come from the Planning Department rather than from Council. Planners from these four communities all mentioned that the department would first discuss if the DPS would be an appropriate tool for their community with little or no direction from Council to do so. The Township of Lake of Bays, however, as one of the original pilot communities for the DPS, had both council and staff involved in the initial discussions to consider implementing the system in the Township. This Planner authored the current town's OP with limited help from consultants, and made the decision not to implement the DPS in the Town at this time (Planner 1).

#### **4.2 Policy Sponsors and Advocates**

The presence of policy leaders, sponsors, and entrepreneurs has also been discussed in academic literature as potentially playing a role in the adoption of new policies (Walker, 2006; Mintrom & Norman, 2009). This includes politicians who set policy directions and allocate resources, as well as municipal staff who can bring forward and advocate for new innovative policies (Walker, 2006). These authors argue that advocates for new innovative policies can have a strong influence on policy changes for that community (Mintrom & Norman, 2009). In regards to the DPS, this theory would suggest that there would be a DPS policy actor or actors that could advocate for the implementation of the DPS within their communities. In addition, these actors



share a desire to invest their own time and energy to significantly change a particular policy area (Mintrom & Norman, 2009). Lastly, it is common for these individuals to work closely in a small team within the organization or have strong social networks outside of the organization, which can support the policy change (Mintrom & Norman, 2009).

As discussed previously, many of the original decisions to consider the DPS came from planning staff, and thus staff would seem to play a significant role in advocating for planning policy changes within the community. The important role that a planner can play in advocating the DPS can be seen in the Town of East Gwillimbury where both the previous Planner (Planner 3) and the current Planner (Planner 4) were interviewed. The original proposal to implement the DPS within the community came from the Town's previous Planner who had past experience working for the Niagara Escarpment Commission, which uses a similar version of the DPS under the Niagara Escarpment Act (Planner 3). This past experience working processing development permits gave this Planner a unique insight into how the DPS could be implemented within the municipality, and they eventually implemented policies within the Official Plan that identified two potential development permit areas within the municipality (Planner 3; East Gwillimbury, 2010). This Planner eventually moved to a different position within the municipality and the new Planner does not advocate the same way for the implementation of the DPS. Instead, the new Planner remains skeptical about the benefits of the DPS for the municipality and does not feel the need to implement the system at this time (Planner 4). While the original planner still remains at the municipality and will be continuing to advocate for the system, it is clear in this example that it can be difficult to implement the DPS without a policy entrepreneur in the municipality. While the DPS might still be implemented within the community, it will remain to be seen whether it will be implemented to the same extent as described in the Official Plan.

Similarly, planners from the City of Kitchener and Township of Mulmur, who are currently not considering the system, did not have any Planners within their departments or community members who were advocating for the system (Planner 1; Planner 2). The City of Kitchener Planner, for example, said that to date there has been very little discussion regarding how the DPS could be implemented in the community (Planner 2).

In contrast, the Planner from the Township of Lake of Bays recalls key policy sponsors involved during the initial development and implementation of the DPS system (Planner 6). The current Planner of the Township recalls the strong involvement from key players on Council and Administrators in the District of Muskoka who supported the implementation of the system for the Town (Planner 6). The City of Hamilton, despite having more specific policies regarding the DPS in their Official Plan, has since decided not to implement the DPS (Planner 6). The original DPS policies for the city were advocated for by the province and were developed in conjunction with a provincially hired consultant. However, since this initial decision there has not been a particular member of the municipality advocating for its implementation and it is unlikely it will be implemented in the near future (Planner 5).

The Township of Lake of Bays also had key policy sponsors involved during the initial development and implementation of the DPS system. The current Planner of the Township recalls the strong involvement from key players on Council and Administrators in the District of Muskoka who supported the implementation of the system for the Town (Planner 6). These were key members in advocating for the system during its initial implementation. While more municipalities would have to be assessed in order to confirm that a DPS sponsor is needed to advocate for the implementation of the DPS, these cases identify that a DPS sponsor might be needed.

### **4.3 Policy Problem/Opportunity**

Public policy analysis literature often discusses how new policies are either enacted in response to a policy problem or a policy opportunity (Pal, 2014). When analyzing public policy decision making, it is important to recognize what problems or opportunities the community currently faces in order to more fully understand why certain policy directions were taken. In this regard, it is important to take into account the unique planning challenges each pilot municipality is facing in order to better understand why a particular decision has been made to implement or not implement the DPS. A municipality's context, and how it defines its unique challenges can play a significant role in determining which policies are chosen to address these issues and how far from the status quo these policies are (True et al., 2007; Walker, 2006; Berry & Berry, 2007).

The challenges a community faces relate to the municipality's context and can include factors such as its size, location, urban demographics, and political environment. Each of these contextual factors can impact the community's challenges and how it chooses to address these issues. How a community defines its planning problems can greatly impact the types of policies it chooses to solve them (Walker, 2006). Problem definition can also play a key role in either justifying or questioning existing policies (True et al., 2007). For example, when a municipality begins a planning policy review process, such as during an Official Plan review, planning challenges and issues will be redefined and existing policies to address these issues will be reassessed. If the existing policy framework is not addressing these new issues, it is likely that it will be changed to some extent. If there is internal agreement, however, that the zoning by-laws are an appropriate tool to address these challenges, then only modest changes to the existing policies are likely to result.

This point was particularly true when analyzing the planning issues faced in the municipal case studies and the municipal willingness to implement the DPS. While each municipality analyzed was presented with their own unique planning challenges, there was a clear difference between those which decided that the DPS could address these problems and those deciding otherwise. The Township of Mulmur's current planning problems for example, include accommodating new development in the community in a way that preserves the existing rural character of the Town (Planner 1). While this was a particular concern for the town, its Planner did not feel that the DPS would be the appropriate tool needed to address this problem and it could easily be addressed within the existing planning framework (Planner 1).

In addition, the more significant and complex the challenges a municipality faces, the more likely it will be to implement new and innovative policies to address those issues (Walker, 2006; True et al., 2007; Berry & Berry, 2007). This is often the result of political pressures to solve pressing issues (True et al., 2007). Municipalities whose planners perceived themselves as having significant planning challenges were more likely to implement the DPS than those that did not. The City of Kitchener, for example, chose not to implement the system. Its planner reported that the community is not facing any particularly difficult or new planning challenges at this time (Planner 2). They were able to address their existing challenges well within their existing planning framework (Planner 2). The Planner from the community, however, mentioned that if the community began to face new and complex planning challenges, they would give the DPS stronger consideration (Planner 2). The City of Kitchener would need a unique situation to consider implementing the system at this time.

In contrast, the Lake of Bays is one community that chose to implement the system in order to better regulate development along waterfront areas, which was a particular challenge for the community (Planner 6). At this time, the Township was undergoing an Official Plan

visioning process that was well supported by council and the public, and there was significant discussion regarding managing development along many of the town's lakes and rivers in order to maintain the natural character and ecology of the area (Planner 6). These areas were identified as being of particular importance to the municipality in order to protect aquatic habitats and the natural character of the town for residents and tourists (Lake of Bays, 2006). The Township was looking for a more efficient and transparent way to regulate development along the waterways and thus had a stronger desire to implement the DPS to address those problems. The DPS presented the municipality with improved tools to regulate development along the waterfront than the existing system, which allowed the town to better address this unique problem area.

Lastly, some municipalities will implement new policies not only to solve problems, but to take advantage of opportunities (Pal, 2014; Walker, 2006). This can include implementing new policies in order to have a competitive advantage over other municipalities (Walker, 2006). This can be seen within the Town of East Gwillimbury where the previous Planner identified how the DPS presented an opportunity for the town to attract new businesses to the areas and to increase the protection of environmentally sensitive areas (Planner 3). It is proposed that the DPS could help to streamline and shorten timelines for the development process for new businesses by combining multiple applications into one, presenting business with a more flexible and transparent vision for new developments, and reducing the risk of appeals from residents (Planner 3). For example, in 2006, an employment building containing manufacturing and office space was constructed in the municipality, and the company was required to submit two separate minor variance applications and a site plan control application, that resulted in a six month delay for the company (Planner 3). In addition, the minor variance applications could have been easily appealed by the public or other businesses to the OMB, which would have

resulted in further delays (Planner 3). If the DPS was used in this instance, the development would have been approved in a significantly reduced timeframe with no risk of appeal from residents. The DPS presents an opportunity to the town to better attract new business to locate in the community over others in the GTA.

#### **4.4 Content with Current System**

As previously mentioned, some municipalities that had chosen not to implement the DPS felt that their existing zoning systems worked well for their municipalities, and there was no need to implement a new system. These municipalities do not believe that the DPS will bring increased efficiency, certainty, and scope in regards to environmental protection and public space improvements, which the system proposes (MMAH, 2007). In addition to being content with the current system, many municipalities expressed additional concerns regarding the DPS in relation to the decreased public involvement and the high cost of implementing the system. Each of these aspects will be discussed in more detail in order to better identify what aspects of the system itself are discouraging implementation.

##### **4.4.1 Efficiency**

One of the key aspects of the DPS is to increase the efficiency of the existing system by consolidating multiple applications and requiring the development permit applications be processed within 45 days of a completed submission (MMAH, 2007). The interviews with municipal planners who have chosen not to implement the DPS at this time revealed that for the most part, many of these communities feel that they are already able to process planning applications efficiently. The current Planner from the Township of Mulmur for example, explained that it was rare for the Township to receive large planning applications, and most applications were processed quickly, some even within the same day (Planner 1). The current Planner for the Township of East Gwillimbury felt similarly to the Township of Mulmur and

thought that applications were already processed efficiently for the township, and there will be few benefits from implementing the system (Planner 4). This thought, however, was different from the previous Planner for the Township of East Gwillimbury as they felt that applications for new business on employment lands could be expedited in order to encourage new businesses to the area (Planner 3). The Planner for the City of Kitchener also felt that currently, the city had a good process for processing planning applications and had been experiencing no major efficiency issues at this time (Planner 2).

The planner at the City of Hamilton, however, thought that their existing planning system could become more efficient by implementing less restrictive zoning by-law regulations, as opposed to implementing the DPS (Planner 5). The Planner interviewed thought the municipality's existing zoning by-law for the downtown area was too restrictive in regards to the uses permitted, and the new zoning by-law addressed this problem by establishing more broad categories of uses within the by-law (Planner 5). Despite having policies already in place to implement the DPS, the City of Hamilton planner instead thought they could achieve the same results simply by adapting their current by-law (Planner 5; City of Hamilton, 2004).

#### **4.4.2 Environmental Protection**

Another key aspect of the DPS is the increased ability for the municipalities to protect the environment by expanding the definition of development to encompasses all site alterations including vegetation removal, and allowing considerations to development such as the ongoing monitoring of environmental sites (MMAH, 2007). While this seemed to be a key area of concern and reason for implementation for the Township of Lake of Bays, Town of Carleton Place, and Town of Gananoque, each of which has a strong natural heritage, it was not as much of a concern for the other municipalities assessed in this research (Lake of Bays, 2006; Carleton Place, 2005; Gananoque, 2009).

Planners at the Township of Mulmur and the Town of East Gwillimbury for example, stated that their environmental areas were already protected due to the strong presence of their respective conservation authorities and the Oak Ridges Moraine and Niagara Escarpment Areas (Planner 1; Planner 4). The Planner from the Township of Mulmur expressed that tension existed between the Township and the Conservation Authority over the regulations on environmental lands, with the Township feeling that at times, conservation authority requests were already too stringent (Planner 1). They also noted there was no need to implement the DPS to protect the removal of vegetation because the municipality currently has 40% tree cover, and the removal of some vegetation would not negatively impact the community (Planner 1). The municipality prefers new developments be placed within wooded areas to preserve the natural character of the town which often requires the removal of certain trees (Planner 1). The City of Kitchener and City of Hamilton Planners similarly didn't express any concerns with the preservation or enhancement of the natural environment in the municipality at this time (Planner 2; Planner 5).

#### **4.4.3 Public Space Improvements**

The DPS also allows municipalities to secure public space improvements such as park benches and improved landscaping with DPS applications (MMAH, 2007). This aspect of the system doesn't seem to appeal greatly to rural municipalities that did not have many public spaces nor any large residential development projects (Planner 1; Planner 3; Planner 4). For example, the Township of Mulmur currently doesn't require that commercial parking lots be paved, therefore streetscape improvements are also not a large concern for the municipality (Planner 1).



#### **4.4.4 Certainty & Public Involvement**

The DPS is proposed to increase certainty by reducing the number of appeals to the by-law and limiting the chance of appeals to the OMB (MMAH, 2008). This is done by developing development permit policies that allow a range of uses and development standards, by encouraging the involvement of the public in the development of these policies, but limiting the appeal rights of the public once the policies have been enacted (MMAH, 2008; O.Reg 608/06). This aspect of the system is the greatest concern for many municipalities considering the system and for those who have already implemented the system.

Every municipality that participated in the research presented some concerns regarding the decrease in public involvement as a result of the DPS. Their main concerns included the inability of the public to appeal a decision made on a development permit application by council or staff once the development permit by-law is in force and effect. Each planner interviewed expressed the growing desire of many councillors and members of the public to have greater involvement in the approval of planning applications (Planner 1; Planner 2; Planner 3; Planner 5). Many thought that it would be difficult politically to remove the public's ability to appeal approved applications as a result of the DPS. The City of Kitchener Planner in particular thought the system would be difficult to implement and to communicate to the public as a result of the strong public involvement of many residents in the current process (Planner 2). The residents of the community are currently pushing to have an even stronger say in the approval of developments, particularly during the site plan review stages of the process. The municipality is already allowing two members of the community to sit in on site plan review meetings to observe in order to address this issue (Planner 2).

The current Planners at the Township of Mulmur and Town of East Gwillimbury felt that it would be very difficult politically to delegate the approval authority of development permit

applications to staff (Planner 1; Planner 4). They expressed the strong desire of many councillors and the public to be involved in the process, and they believed it would be difficult to approve large scale development in these small communities with limited input from councillors. The previous Planner from the Town of East Gwillimbury shared a different view however, and felt the limited role of the public in the development approval process, if the DPS were to be implemented in employment areas, would not be of particular concern (Planner 3). This is because these areas are located on vacant land along the highway and would have a limited impact on residents (Planner 3). While this Planner feels that this concern could be addressed, it is likely that it will still impact the municipality's future consideration for the system.

This concern was also clearly shared by planners in the four municipalities that have implemented the system. Each of these municipalities have included measures within their development permit by-laws that retain Council's right to approve development permit applications, particularly those larger in nature. Each municipality has developed criteria for when development permits are to be approved by the planning department, a planning committee, or Council (City of Brampton, 2011; Carleton Place, 2008; Gananoque, 2014). The City of Brampton development permit by-law for example, delegates the approval authority to the Director of the Planning department. However, staff can refer an application to Council for approval at any time (City of Brampton, 2011). Similarly, the Towns of Carleton Place and Gananaque established classes of applications that require approval from the Department or Council (Carleton Place, 2008; Gananoque, 2014).

#### **4.4.5 Cost**

Lastly, the cost of implementing a new policy was also found to be a factor against the implementation of the DPS. This was seen in the case of the City of Hamilton where the Planner made note of the large upfront cost of implementing the DPS (Planner 5). This is the result of

the significant amount of time needed to develop development permit policies, amend the municipality's Official Plan, and implement the by-law. This process can consume a lot of resources from the community, which can discourage the municipality from implementing the system. The Planner from the City of Kitchener stated that, once the secondary plan was completed for the downtown area which includes DPS policies, it was much easier for the City to implement a more flexible version of a zoning by-law for the downtown area over developing a large policy document and by-law for the DPS (Planner 5). In addition, the City did not feel they would gain any additional benefits from implementing the DPS over a more flexible version of the zoning by-law, which was implemented (Planner 5).

The large amount of upfront work required in the creation of a development permit by-law is apparent when looking at the four by-laws currently implemented in the province. Each by-law has been written to resemble a planning policy document over a traditional zoning by-law (Lake of Bays, 2010; Carleton Place, 2008; Gananoque; 2010; Brampton, 2011). The City of Brampton Development Permit By-law for the downtown in particular is a very large policy document that has been written in six parts (Brampton, 2011). The resources needed to develop a development permit by-law will surely be an important factor to many communities, such as Hamilton, when considering implementing the system.

#### **4.5 Risk Averse Nature & Preference for the Status Quo**

Other limitations to the implementation of new policies can include the risk adverse nature of many public institutions (True et al., 2007; Berry & Berry, 2007; Samuelson & Zeckhauser, 1988; Mintrom & Norman, 2009). This can cause policies to be adapted slowly and can greatly limit the implementation of significant policy changes such as the DPS (Mintrom & Norman, 2009; True et al., 2007). This risk averse nature can create a preference for the status quo over other alternatives, due to the increased risk and uncertainty which can come with new

policies such as the DPS (Samuelson & Zeckhauser, 1988). Thus in municipalities which are often risk averse, there might be a stronger tendency to stick with the status quo of the current planning framework, rather to take on the risks and uncertainty of implementing the DPS. The status quo for many municipal planning departments today is likely to use zoning by-laws to regulate land uses, as zoning by-laws continue to be widely used across the province. Changing this preference from the status quo can be challenging for municipalities who are risk adverse or who are uncertain about the new DPS.

The significant influence that the status quo can have on decision making was identified by one study which found that when an alternative was framed as the status quo, participants were significantly more likely to choose that option (Samuelson & Zeckhauser, 1988). If the individual originally preferred a different alternative, however, they were less biased to the status quo (Samuelson & Zeckhauser, 1988). While there are many other factors which could lead a municipality to remain with zoning over the DPS, this study helps to further explain why the DPS hasn't been widely implemented. As was previously discussed, there are a variety of reasons why municipalities are choosing to remain with zoning, including the perceived risk of decreasing the public appeal rights. It is likely that regardless of the many benefits the DPS is supposed to bring to communities, the perceived risks and uncertainty with implementing the DPS is causing municipalities to continue to choose the status quo.

This literature also begins to describe how the status quo changes within governments. Mainly, as more municipalities begin to implement the DPS the perceived risks of the system will decrease and more municipalities could be encourage to move away from the status quo to implement (Berry & Berry, 2007). As was previously discussed, these original policy changes could arise as a result of influential policy sponsors who can identify how the DPS can be used to solve a particular problem or take advantage of an opportunity for the municipality (Walker,

2006; Mintrom & Norman, 2009). While currently most of the municipalities which have implemented the system are small, it is likely that once a largely municipality implements the DPS, the status quo will change more significantly and more areas will consider implementing the system.

The City of Toronto for example, is one community which has just started to consider if the DPS should be implemented parts of the city (City of Toronto, 2014). The City is currently going through a public consultation process to evaluate if the DPS system should be implemented in the community (City of Toronto, 2014). If the DPS is more widely implemented, such as if it were implemented by the City of Toronto, it could likely be considered the new status quo for municipalities and would encourage more municipalities to implement the system (Berry & Berry, 2007). This would likely occur because there would be increased pressure for municipalities to meet the new status quo (Berry & Berry, 2007).

#### **4.6 Policy Transfer and Diffusion**

It is important to consider how policies are transferred and diffused from one community to another. This can help to better explain how DPS policies are being implemented in the province and what factors could be hindering the future implantation of these policies. Policy diffusion literature tries to explain how new policies are adopted by organizations over space and time (Walker, 2006; Dolowitz & Marsh, 2000). These scholars try to explain how a policy from one jurisdiction is adapted and implemented in another jurisdiction (Dolowitz & Marsh, 2000). This transfer of policies has become more prevalent as a result of the increased use of technology (Dolowitz & Marsh, 2000). Policy diffusion has been seen to occur within communities that are experiencing similar problems, have similar organizational structures, are located in close proximity to each other, or are in direct competition with each other (Nykiforuk, et al., 2008; Berry & Berry, 2007).

First, it is common for municipalities to utilize policy solutions from other communities which are experiencing similar problems and that have similar organizational structures (Nykiforuk, et al., 2008; Berry & Berry, 2007). An example of this can be seen between the Town of Carleton Place and the Town of Gananoque, which share similar characteristics and have both implemented the DPS by-laws which cover their entire communities within two years of each other (Town of Carleton Place, 2008). The communities, which are located within 100km of each other, are both located along waterways, have distinctive historic centers, and are surrounded by natural landscapes. Both communities' Official Plans speak to preserving their town historic and environmental characters as well as enhancing their waterfront (Town of Gananoque, 2009; Town of Carleton Place, 2005). These communities are also located relatively closely to the Township of Lake of Bays, which is of similar size and was the first municipality to implement the system. This shows how the development permit system might be further diffused in the future to communities that face similar challenges to those that have already implemented the system.

Organizations that are located close together and have similar structures are likely to adopt comparable policies because they can better understand how the new policy direction will work in their community (Berry & Berry, 2007). In addition, as seen in the example of the Lake of Bays, Carleton Place, and Gananoque, these communities often share similar problems and policy directions (Berry & Berry, 2007).

The literature suggests that policy diffusion also occurs as a result of social and policy networks which influences others to implement similar policies (Nykiforuk, et al., 2008). It is also common to see policy diffused outwards between jurisdictions which are located close to one another and are of similar size (Nykiforuk, et al., 2008). This can be seen when comparing the

Township of Lake of Bays, the Town of Carleton Place, and the Town of Gananoque, which are all located within the same area of Ontario.

The literature also suggests that the more jurisdictions in a particular geographical area that adopt a new policy direction, the more it will encourage other municipalities in that area to adopt a similar policy direction (Berry & Berry, 2007). This is thought to occur because these municipalities will not only learn from each other, but compete against each other (Berry & Berry, 2007). It is likely that the Lake of Bays, Carleton Place, and Gananoque each compete with each other to some extent due to their similar contexts, and this played a role in each of these communities adopting the DPS.

#### **4.7 Lack of Knowledge**

Lastly, a general lack of knowledge was also a factor that limited the implementation of the DPS in some communities. Similarly to what was concluded by Nethery, municipal planners' lack of knowledge about the DPS continues to be a challenge to its implementation (2011). The City of Kitchener planner specifically stated that the municipality's limited knowledge and experience with the development permit system makes it difficult to consider the system (Planner 2). In addition they are unaware about the experience that other municipalities have been having with the system which increases the uncertainty of moving to the system (Planner 2). This opinion was shared by many of the other planners interviewed who thought that the general lack of knowledge about the system was limiting its implementation (Planner 3; Planner 5; Planner 6).

Those municipalities planning on implementing or who have implemented the system, also seemed to have increased knowledge on the system from past experiences or partnerships with others. For example, the previous planner from the Town of East Gwillimbury had prior knowledge about the development permit's from their time spent working at the Niagara

Escarpment Commission, which processes similar applications (Planner 3). They had also been working closely with provincial employees and a private consulting planners who had more knowledge and prior experience working with the system. In addition, while the Township of Lake of Bays expresses that they didn't have much support from the province about how the system could work in their community, they hired private legal advice in order to better understand how the by-law would be written and implemented for the community (Planner 6). Lastly, the planner from the City of Hamilton stated that they had help from a private consultant hired by the province for assistance with the development of their DPS policies (Planner 5). While these policies will no longer be implemented through a by-law, the municipality wouldn't have had the knowledge to implement the system without this assistance (Planner 5). These examples show a large barrier to DPS implementation is the lack of knowledge about how the system has been working in other communities, as well as a general lack of knowledge about how to write and implement DPS policies.

### **Chapter 5: Recommendations**

There are many factors which can contribute to some municipalities choosing to enact the DPS and others not. While many of these factors are contextual, some factors such as the risk adverse nature of municipalities, a lack of knowledge about the DPS, and concerns over limiting public involvement can be addressed in order to encourage more municipalities to utilize the system. In addition, as more municipalities implement the DPS, others could also be encouraged to implement the system. Academic's who study public policy diffusion and transfer often make recommendations about how to encourage policy changes and adjustments from the status quo. This mainly includes improving communication among stakeholders which consist of improving the role of the policy sponsor, increasing communication networks among municipalities, and communicating the experiences of pilot municipalities.



First, policy sponsors are seen to play an important role in the implementation of new policy directions for a community. As was seen in the previous analysis, DPS policy sponsors played a key role in advocating for the system within their communities. Literature suggests that in order to be successful in advocating for a new policy direction, policy entrepreneurs must identify the improved social outcomes that can come from the new policy decision, in order to better gain support from decision makers and the community (Mintrom & Norman, 2009). In this case, the DPS can be further encouraged by sponsors, by highlighting its increase ability to protect environmental sensitive areas, improve public spaces through streetscape improvements, and increase economic opportunities that can arise from streamlining the development approval process (MMAH, 2007). It is important that these potential benefits to the community and the development industry are identified. Next, the literature also suggests that policy sponsor can be more successful if they more clearly define the problem the community is facing and how this new policy direction can address this issue (Mintrom & Norman, 2009). This would also include identifying how the current policy is failing at addressing this problem (Mintrom & Norman, 2009). For example, the policy sponsor could identify why a traditional zoning by-law is not effectively regulating development the community, and propose how the DPS could be a better tool to address this problem. These suggestions could assist DPS policy sponsors to more effectively communicate the benefits of the DPS to their communities.

It is important that these individuals work closely with other groups of people within and outside of the organization to show the new policy direction will work for the community (Mintrom & Norman, 2009). Developing these partnerships with community stakeholders, other advocates for the system, as well as those who already use the system, can help to further gain political support for the system. Creating networking groups between planners in different

municipal organizations can also encourage more municipalities to implement new and innovative policies, such as the DPS (Walker, 2006).

An example of policy networking among communities can be seen in England where the Beacon Council Scheme was developed in order to improve learning on innovative strategies among municipal organizations (Walker, 2006). It was developed in 1999 as a way to identify community best practices with the hope that other communities would learn from these practices and be encouraged to implement similar strategies in their communities (Office of the Prime Minister, 2005). A similar strategy could be used in Ontario, in which communities which have developed innovative policies to address their planning challenges can be acknowledged in order to encourage more communities to implement similar strategies. Communities which have implemented the DPS could be highlighted in order to increase communication about the system among municipalities.

Lastly, it is also recommended that pilot projects be used and communicated in order to better address the concerns of opponents for the new system (Mintrom & Norman, 2009). This is because it can be easier for municipalities to implement policies which are perceived to be working well in other communities (Walker, 2006). In addition, this can help to address the risk adverse nature of many communities. The province of Ontario for example, used pilot projects prior to the implementation of the DPS in order to identify “the effectiveness of the system and to [identify] potential implementation issues with the legislative framework” (MMAH, 2007). Other than a brief mention regarding which municipalities participated in the pilot projects, there has been limited information provided regarding what kind of positive information was found out as a result of the initiatives (MMAH, 2008). In addition, some information is given regarding the Township of Lake of Bays experience using the DPS, but much of this information has not been updated to show if the Lake of Bays has experienced any positive outcomes as a

result of switching to this system (MMAH, 2007). According to academic literature, this lack of information can make it difficult for advocates of this new policy direction to convince decision makers that the change would be positive and would have limited risk for municipalities.

## **Chapter 6: Conclusion**

The above analysis shows that there are many factors which could be impacting a municipalities' decision to implement the DPS. These factors can include the presence of a policy sponsor, the existence of a unique planning problem, the satisfaction with the current planning system, the risk adverse nature of many municipalities, and a general lack of knowledge of the DPS. While some of these factors can be addressed, many require time in order to create a change in the status quo of planning policy.

In order to encourage more municipalities to implement the system, it is recommended that communication is improved among those municipalities who have implemented the system, and those that have not, to increase the overall knowledge of the system and address concerns. This can include sharing the experiences of pilot communities who have chosen to implement the system. Lastly, it is recommended that DPS policy sponsors clearly identify how the DPS would be a more effective tool than the traditional zoning by-law at addressing the key challenges of the community.

Even though further research will need to be conducted in order to confirm these findings, this research better explains the limited implementation of the system and present recommendations to increase the adoption of the DPS moving forward. Although communities may still choose to remain with zoning, the DPS can present another alternative to municipalities in addressing their planning challenges.

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**Appendix A: Municipal Implementation of the Development Permit System  
As of July 26, 2014**

- 1 no mention of development permit system;
- 2 chosen not to implement the development permit system;
- 3 chosen to consider implanting the development permit system
- 4 have fully implemented the development permit system.

Municipality	OP Consolidation Date	1	OP Policies			4
			Implemented	2	3	
Addington Highlands, Township of	2006	1	0	0	0	0
Adelaide-Metcalfe, Township of	2011	1	0	0	0	0
Adjala-Tosorontio, Township of	2000	1	0	0	0	0
Admaston/Bromley, Township of	2012	1	0	0	0	0
Ajax, Town of	2012	0	1	1	0	0
Alberton, Township of	2011	1	0	0	0	0
Alfred and Plantagenet, Township of	2006	1	0	0	0	0
Algonquin Highlands, Township of	2011	1	0	0	0	0
Alnwick/Haldimand, Township of	2007	1	0	0	0	0
Amaranth, Township of	2005	1	0	0	0	0
Amherstburg, Town of	2014	1	0	0	0	0
Armour, Township of	2009	1	0	0	0	0
Armstrong, Township of	2012	0	1	1	0	0
Arnprior, Town of	2012	1	0	0	0	0
Arran-Elderslie, Municipality of	2010	1	0	0	0	0
Ashfield-Colborne-Wawanosh, Township of	2013	1	0	0	0	0
Asphodel-Norwood, Township of	2014	1	0	0	0	0
Assiginack, Township of	2014-Draft	0	1	0	0	0
Athens, Township of	2012	0	1	1	0	0
Atikokan, Town of	2012-Draft	0	1	0	1	0
Augusta, Township of	2012	1	0	0	0	0
Aurora, Town of	2010	1	0	0	0	0
Aylmer, Town of	2008	1	0	0	0	0
Baldwin, Township of		1	0	0	0	0
Bancroft, Town of	2009	1	0	0	0	0
Barrie, City of	2011	1	0	0	0	0
Bayham, Municipality of	2012	0	1	0	0	0
Beckwith, Township of	1989	1	0	0	0	0
Belleville, City of	2002	1	0	0	0	0
Billings, Township of	2014-Draft	0	1	0	0	0
Black River-Matheson, Township of	2009	1	0	0	0	0



Blandford-Blenheim, Township of	2006	1	0	0	0	0
Bluewater, Municipality of	2005	1	0	0	0	0
Bonnechere Valley, Township of	2012	1	0	0	0	0
Bracebridge, Town of	2013	1	0	0	0	0
Bradford West Gwillimbury, Town of	2002	1	0	0	0	0
Brampton, City of	2011	0	0	0	0	1
Brant, County of	2012	1	0	0	0	0
Brantford, City of	2014	1	0	0	0	0
Brethour, Township of	2011	1	0	0	0	0
Brighton, Municipality of	2010	1	0	0	0	0
Brock, Township of	2013	1	0	0	0	0
Brockton, Municipality of	2010	1	0	0	0	0
Brockville, City of	2012	0	1	1	0	0
Brooke-Alvinston, Municipality of	2011	1	0	0	0	0
Bruce, County of	2010	1	0	0	0	0
Bruce Mines, Town of	2012	1	0	0	0	0
Brudenell, Lyndoch and Raglan, Township of	2012	1	0	0	0	0
Burk's Falls, Village of	2011	1	0	0	0	0
Burlington, City of	2013	1	0	0	0	0
Burpee and Mills, Township of	2014-Draft	0	1	0	0	0
Caledon, Town of	2014	0	1	1	0	0
Callander, Municipality of	2011	1	0	0	0	0
Calvin, Municipality of	2010	1	0	0	0	0
Cambridge, City of	2012	0	1	1	0	0
Carleton Place, Town of	2013	0	0	0	0	1
Carling, Township of	2011	1	0	0	0	0
Carlow/Mayo, Township of	2009	1	0	0	0	0
Casselman, Village of	2006	1	0	0	0	0
Cavan Monaghan, Township of	2012-Draft	1	0	0	0	0
Central Elgin, Municipality of	2012	1	0	0	0	0
Central Frontenac, Township of	2008	1	0	0	0	0
Central Huron, Municipality of	2014-Draft	1	0	0	0	0
Central Manitoulin, Municipality of	2014-Draft	0	1	0	0	0
Centre Hastings, Municipality of	2009	1	0	0	0	0
Centre Wellington, Township of	2013	1	0	0	0	0
Chamberlain, Township of	2012	1	0	0	0	0
Champlain, Township of	2006	1	0	0	0	0
Chapleau, Township of	2013	0	1	1	0	0
Charlton and Dack, Municipality of	2012	1	0	0	0	0
Chatham-Kent, Municipality of	2014	1	0	0	0	0

Chatsworth, Township of	2013	1	0	0	0	0
Chisholm, Township of	2013	1	0	0	0	0
Clarence-Rockland, City of	2006	1	0	0	0	0
Clarington, Municipality of	2013	0	1	1	0	0
Clearview, Township of	2002	1	0	0	0	0
Cobalt, Town of	2012	1	0	0	0	0
Cobourg, Town of	2002	1	0	0	0	0
Cochrane, Town of	2013-Draft	1	0	0	0	0
Cockburn Island, Township of	2014-Draft	0	1	0	0	0
Collingwood, Town of	2012	1	0	0	0	0
Conmee, Township of	2010	1	0	0	0	0
Cornwall, City of	2004	1	0	0	0	0
Dawson, Township of	2013	1	0	0	0	0
Deep River, Town of	2008	1	0	0	0	0
Deseronto, Town of	2009	1	0	0	0	0
Douro-Dummer, Township of	2014	1	0	0	0	0
Drummond/North Elmsley, Township of	2012	1	0	0	0	0
Dryden, City of	2012	1	0	0	0	0
Dufferin, County of	2014-Draft	0	1	1	0	0
Durham, Regional Municipality of	2013	1	0	0	0	0
Dutton/Dunwich, Municipality of	2013	1	0	0	0	0
Dysart, Dudley, Harcourt, Guilford, Harburn, Bruton, Havelock, Eyre and Clyde, United Townships of	2010	1	0	0	0	0
Ear Falls, Township of	2006	1	0	0	0	0
East Ferris, Township of	1999	1	0	0	0	0
East Garafraxa, Township of	2005	1	0	0	0	0
East Gwillimbury, Town of	2014	0	1	0	1	0
East Hawkesbury, Township of	2006	1	0	0	0	0
East Zorra-Tavistock, Township of	2006	1	0	0	0	0
Edwardsburgh/Cardinal, Township of	2014	1	0	0	0	0
Elgin, County of	2012	1	0	0	0	0
Elizabethtown-Kitley, Township of	2006	1	0	0	0	0
Elliot Lake, City of	2006	0	1	0	1	0
Englehart, Town of	2012	1	0	0	0	0
Enniskillen, Township of	2005	1	0	0	0	0
Erin, Town of	2007	1	0	0	0	0
Espanola, Town of	2010	1	0	0	0	0
Essa, Township of	2001	1	0	0	0	0
Essex, County of	2014	1	0	0	0	0
Essex, Town of	2009	1	0	0	0	0

Evanturel, Township of	2012	1	0	0	0	0
Faraday, Township of	2009	1	0	0	0	0
Fort Erie, Town of	2011	1	0	0	0	0
Fort Frances, Town of	2012	1	0	0	0	0
French River, Municipality of	2010	0	1	1	0	0
Front of Yonge, Township of	2006	1	0	0	0	0
Frontenac, County of	2013-Draft	1	0	0	0	0
Frontenac Islands, Township of	2011	1	0	0	0	0
Gananoque, Town of	2009	0	0	0	0	1
Gauthier, Township of	2011	1	0	0	0	0
Georgian Bay, Township of	2014	0	1	1	0	0
Georgian Bluffs, Township of	2013	1	0	0	0	0
Georgina, Town of	2010	1	0	0	0	0
Gillies, Township of	2009	1	0	0	0	0
Goderich, Town of	2013	1	0	0	0	0
Gordon/Barrie Island, Municipality of	2014-Draft	0	1	0	0	0
Gore Bay, Town of	2014-Draft	0	1	0	0	0
Grand Valley, Town of	2014	1	0	0	0	0
Gravenhurst, Town of	2008	0	1	1	0	0
Greater Madawaska, Township of	2012	1	0	0	0	0
Greater Napanee, Town of	2002	1	0	0	0	0
Greater Sudbury, City of	2014	1	0	0	0	0
Greenstone, Municipality of	2010	1	0	0	0	0
Grey, County of	2013	1	0	0	0	0
Grey Highlands, Municipality of	2013	1	0	0	0	0
Grimsby, Town of	2012	1	0	0	0	0
Guelph, City of	2012	0	1	1	0	0
Guelph/Eramosa, Township of	2010	1	0	0	0	0
Haldimand County	2013	0	1	1	0	0
Haliburton, County of	2010	1	0	0	0	0
Halton, Regional Municipality of	2013	1	0	0	0	0
Halton Hills, Town of	2008	1	0	0	0	0
Hamilton, City of	2013	0	1	0	1	0
Hamilton, Township of	2011	1	0	0	0	0
Hanover, Town of	2013	1	0	0	0	0
Hastings, County of	2009	1	0	0	0	0
Hastings Highlands, Municipality of	2009	1	0	0	0	0
Havelock-Belmont-Methuen, Township of	2012	1	0	0	0	0
Hawkesbury, Town of	2006	1	0	0	0	0
Head, Clara and Maria, Township of	2012	1	0	0	0	0
Highlands East, Municipality of	2004	1	0	0	0	0

Hilliard, Township of	2011	1	0	0	0	0
Hilton, Township of	2010	1	0	0	0	0
Hilton Beach, Village of	2010	1	0	0	0	0
Horton, Township of	2012	1	0	0	0	0
Howick, Township of	2011	1	0	0	0	0
Huntsville, Town of	2006	1	0	0	0	0
Huron, County of	2013	1	0	0	0	0
Huron East, Municipality of	2009	1	0	0	0	0
Huron Shores, Municipality of	2011	1	0	0	0	0
Huron-Kinloss, Township of	2010	1	0	0	0	0
Ignace, Township of	2010	1	0	0	0	0
Ingersoll, Town of	2006	1	0	0	0	0
Innisfil, Town of	2011	1	0	0	0	0
Jocelyn, Township of	2010	1	0	0	0	0
Johnson, Township of	2009	1	0	0	0	0
Joly, Township of	2014-Draft	1	0	0	0	0
Kapuskasing, Town of	1998	0	1	0	0	0
Kawartha Lakes, City of	2012	1	0	0	0	0
Kearney, Town of	2014	1	0	0	0	0
Kenora, City of	2010	1	0	0	0	0
Killaloe, Hagarty and Richards, Township of	2012	1	0	0	0	0
Killarney, Municipality of	2010	0	1	1	0	0
Kincardine, Municipality of	2010	1	0	0	0	0
Kingston, City of	2013	0	1	0	0	0
Kingsville, Town of	2012	1	0	0	0	0
Kirkland Lake, Town of	2014-Draft	1	0	0	0	0
Kitchener, City of	2014-Draft	0	1	1	0	0
La Vallee, Township of	2012-Draft	1	0	0	0	0
LaSalle, Town of	2003	1	0	0	0	0
Laird, Township of	Draft	1	0	0	0	0
Lake of Bays, Township of	1999	0	0	0	0	1
Lake of the Woods, Township of	2013	1	0	0	0	0
Lakeshore, Town of	2010	1	0	0	0	0
Lambton, County of	1997	1	0	0	0	0
Lambton Shores, Municipality of	2013	1	0	0	0	0
Lanark Highlands, Township of	2012	0	1	0	1	0
Larder Lake, Township of	2010	1	0	0	0	0
Laurentian Hills, Town of	2010	0	1	1	0	0
Laurentian Valley, Township of	2004	0	1	1	0	0
Leamington, Municipality of	2008	1	0	0	0	0
Leeds and the Thousand Islands,	2006	1	0	0	0	0

Township of						
Limerick, Township of	2009	1	0	0	0	0
Lincoln, Town of	2010	1	0	0	0	0
London, City of	2014-Draft	0	1	1	0	0
Loyalist, Township of	2010	1	0	0	0	0
Lucan Biddulph, Township of	2013-Draft	1	0	0	0	0
Machar, Township of	2012	1	0	0	0	0
Madawaska Valley, Township of	2012	1	0	0	0	0
Madoc, Township of	2009	1	0	0	0	0
Magnetawan, Municipality of	2005	1	0	0	0	0
Malahide, Township of	2003	1	0	0	0	0
Mapleton, Township of	2010	1	0	0	0	0
Marathon, Town of	2006	1	0	0	0	0
Markham, City of	2013	0	1	1	0	0
Markstay-Warren, Municipality of	2010	0	1	1	0	0
Marmora and Lake, Municipality of	2009	1	0	0	0	0
Matachewan, Township of	2014-Draft	1	0	0	0	0
Mattawa, Town of	2010	1	0	0	0	0
McDougall, Township of	2006	1	0	0	0	0
McKellar, Township of	2011	1	0	0	0	0
McMurrich/Monteith, Township of	2007	1	0	0	0	0
Meaford, Municipality of	2013	1	0	0	0	0
Melancthon, Township of	2014-Draft	1	0	0	0	0
Merrickville-Wolford, Village of	2008	1	0	0	0	0
Middlesex, County of	2006	1	0	0	0	0
Middlesex Centre, Municipality of	2010	1	0	0	0	0
Midland, Town of	2014	1	0	0	0	0
Milton, Town of	2008	1	0	0	0	0
Minden Hills, Township of	2014	1	0	0	0	0
Minto, Town of	2010	1	0	0	0	0
Mississauga, City of	2013	0	1	1	0	0
Mississippi Mills, Town of	2006	1	0	0	0	0
Mono, Town of	2009	1	0	0	0	0
Montague, Township of	2011	1	0	0	0	0
Morley, Township of	2011	1	0	0	0	0
Morris-Turnberry, Municipality of	2006	1	0	0	0	0
Mulmur, Township of	2012	0	1	1	0	0
Muskoka, District Municipality of	2014	0	1	1	0	0
Muskoka Lakes, Township of	2013	1	0	0	0	0
Nairn and Hyman, Township of	2012	1	0	0	0	0
Needing, Municipality of	2008	1	0	0	0	0

New Tecumseth, Town of	2010	1	0	0	0	0
Newmarket, Town of	2008	1	0	0	0	0
Niagara Falls, City of	2012	1	0	0	0	0
Niagara-on-the-Lake, Town of	2013	1	0	0	0	0
Nipissing, Township of	2010	1	0	0	0	0
Norfolk County	2011	1	0	0	0	0
North Algona Wilberforce, Township of	2012	1	0	0	0	0
North Bay, City of	2012	1	0	0	0	0
North Dumfries, Township of	2008	1	0	0	0	0
North Dundas, Township of	2005	0	1	1	0	0
North Frontenac, Township of	2012-Draft	1	0	0	0	0
North Glengarry, Township of	2009	0	1	1	0	0
North Grenville, Municipality of	2010	1	0	0	0	0
North Huron, Township of	2004	1	0	0	0	0
North Kawartha, Township of	2014	1	0	0	0	0
North Middlesex, Municipality of	2014	0	1	1	0	0
North Perth, Municipality of	2008	1	0	0	0	0
North Stormont, Township of	2009	0	1	1	0	0
Northeastern Manitoulin and The Islands, Town of	2014-Draft	0	1	0	0	0
Northern Bruce Peninsula, Municipality of	2010	1	0	0	0	0
Northumberland, County of	2014-Draft	1	0	0	0	0
Norwich, Township of	2006	1	0	0	0	0
O'Connor, Township of	2002	1	0	0	0	0
Oakville, Town of	2009	0	1	1	0	0
Oil Springs, Village of	2005	1	0	0	0	0
Oliver Paipoonge, Municipality of	2011	1	0	0	0	0
Orangeville, Town of	2013	0	1	1	0	0
Orillia, City of	2013	0	1	1	0	0
Oro-Medonte, Township of	2007	1	0	0	0	0
Oshawa, City of	2013	1	0	0	0	0
Otonabee-South Monaghan, Township of	2014-Draft	1	0	0	0	0
Ottawa, City of	2003	1	0	0	0	0
Owen Sound, City of	2013	1	0	0	0	0
Oxford, County of	2006	1	0	0	0	0
Papineau-Cameron, Township of	2010	1	0	0	0	0
Parry Sound, Town of	2014	1	0	0	0	0
Peel, Regional Municipality of	2013	1	0	0	0	0
Pelee, Township of	2009	1	0	0	0	0

Pelham, Town of	2014	0	1	0	1	0
Pembroke, City of	2008	0	1	1	0	0
Penetanguishene, Town of	2011	1	0	0	0	0
Perry, Township of	2013	0	1	0	1	0
Perth, Town of	2000	1	0	0	0	0
Perth, County of	2008	1	0	0	0	0
Petawawa, Town of	2011	1	0	0	0	0
Peterborough, County of	2014	1	0	0	0	0
Peterborough, City of	2009	1	0	0	0	0
Puslinch, Township of	2010	1	0	0	0	0
Russell, Township of	2006	1	0	0	0	0
Saugeen Shores, Town of	2010	1	0	0	0	0
Selwyn, Township of	2014	1	0	0	0	0
South Bruce, Municipality of	2010	1	0	0	0	0
South Bruce Peninsula, Town of	2010	1	0	0	0	0
South-West Oxford, Township of	2006	1	0	0	0	0
Southgate, Township of	2013	1	0	0	0	0
St. Joseph, Township of	2010	1	0	0	0	0
St.-Charles, Municipality of	2010	0	1	1	0	0
Stirling-Rawdon, Township of	2009	1	0	0	0	0
Tarbutt and Tarbutt Additional, Township of	2012-Draft	1	0	0	0	0
Tehkummah, Township of	2014-Draft	0	1	0	0	0
Temiskaming Shores, City of	2014	1	0	0	0	0
The Blue Mountains, Town of	2013	1	0	0	0	0
The Nation Municipality	2006	1	0	0	0	0
Tillsonburg, Town of	2006	1	0	0	0	0
Tudor and Cashel, Township of	2009	1	0	0	0	0
Tweed, Municipality of	2009	1	0	0	0	0
Tyendinaga, Township of	2009	1	0	0	0	0
Wellington North, Township of	2010	1	0	0	0	0
West Grey, Municipality of	2013	1	0	0	0	0
Whitewater Region, Township of	2012	1	0	0	0	0
Windsor, City of	2013	1	0	0	0	0
Wollaston, Township of	2009	1	0	0	0	0
Woodstock, City of	2006	1	0	0	0	0
Zorra, Township of	2006	1	0	0	0	0
		250	52	33	7	4