



Town of Huntsville Community Planning Permit System and By-law Review

Final Recommendations Report

May 2026



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Executive Summary

Purpose: StrategyCorp was retained by Huntsville to conduct a comprehensive review of the Town's Community Planning Permit System (CPPS) and By-Law (CPPBL), which came into effect in early 2023.

Methodology: The review and resulting recommendations were informed by staff and stakeholder feedback, existing Town planning policies and processes, comparator and leading practices, and provincial regulatory and legislative frameworks and policy direction.

Outcomes: The 18 recommendations identified in this report are organized into five key opportunity areas designed to be responsive to the most persistent challenges identified by staff, Council, and members of the development community:

- 1 **Improve pre-consultation consistency, clarity, and value.**
- 2 **Improve permit application quality.**
- 3 **Streamline application processing, review and issuance.**
- 4 **Calibrate CPPBL triggers and exemptions to risk.**
- 5 **Establish service standards and accountability structures.**

Summary of Key Findings

- The CPPS has created several efficiencies for both developers and the Town in the processing of planning approvals, while continuing to protect Huntsville's natural environment and community character in alignment with its strategic priorities, Official Plan, and provincial and District policies.
- Persistent challenges are generally not driven by the CPPBL itself, but by how it has been implemented and the inherent challenges of planning and development in Ontario that are experienced across jurisdictions.
- Implementation of the CPPBL has been iterative, and the Town continues to identify and implement changes to the By-law and associated processes in response to emerging issues raised by Council, staff, stakeholders, and legislative changes.
- Immediate opportunities to improve the CPPS are primarily centered on improved communications of ongoing system improvements and changes and better aligning process and outcome expectations for applicants, residents, staff, and Council.
- In the medium- to long- term, more significant regulatory changes may be appropriate so long as they align with the Town's overall policy direction and are informed by community consultation.

Balancing Public & Private Interests

Planning approval processes inherently require a balance between the private interests of individual developers and broader public objectives.

These public interests are documented and formalized in a municipality's Official Plan, which are given effect by the various by-laws and permitting systems adopted. Municipal Councils and staff are required to uphold their Official Plan, per the *Planning Act*.¹

As a result, these systems necessarily create checks and constraints on development which can be perceived as obstacles for applicants and developers.

This tension between public and private interests is both desirable and necessary within the planning process and must be considered when exploring optimization opportunities.

Introduction & Overview

This section provides an overview of:

- Project Background & Context
- Report Overview & Process Summary
- Operational Context for the CPPS
- Summary of Preliminary Finding
- Overview of Recommendations & Implementation Considerations

Background & Context

The Town of Huntsville initiated the development of its Community Planning Permit System (CPPS) in 2020.

This transition was intended to align with:

- Approved 2019 **Official Plan (OP)** objectives;
- The 2019-2023 **Strategic Plan** priorities around Economic Development, Healthcare & Wellness, Natural Environment & Sustainability, Roads & Infrastructure, Financial Management and Governance & Communications.
- The 2010 **Sustainability Plan** goals around Environmental Protection, Land-use Planning, and Economic Development.

A **CPPS is an alternative land use planning tool** available to municipalities in Ontario that combines Zoning By-law Amendments (ZBAs), Minor Variances (MVs) and Site Plan Applications (SPAs) into a single application and approval process administered by a CPPBL in place of a traditional zoning by-law.

CPPS Objectives:

- ✓ **Streamline planning applications** into a single “one window” system for regulating development and site alteration.
- ✓ **Reduce approval delays** and timeline for applicants and other service users.
- ✓ **Improved clarity and predictability in approvals** for applicants and other service users.
- ✓ **Enabling more flexibility** to collaborate with applicants on projects and align them with community interests.
- ✓ **Control development in environmentally sensitive areas** in alignment with community priorities.

Project Objectives

Now three years into CPPS implementation, StrategyCorp was retained to conduct a comprehensive review of the Town’s CPPS and Community Planning Permit By-Law (CPPBL) to:

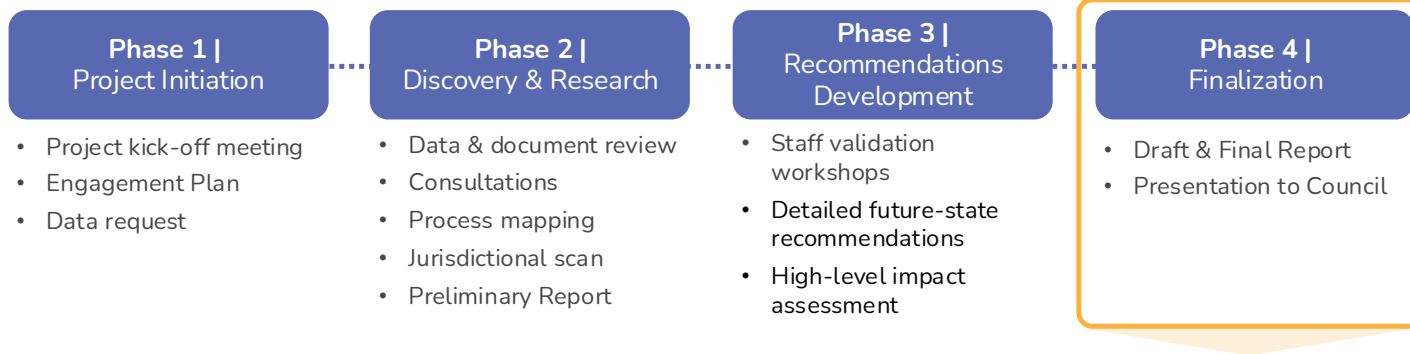
- Evaluate whether the CPPS is achieving intended objectives.
- Assess the alignment of the CPPS with Huntsville’s strategic priorities, as defined in its updated Strategic Plan adopted on January 29, 2024.
- Understand and document the experience of developers, property owners, and the public in navigating the CPPS.
- Develop practical recommendations to optimize and refine the CPPS.

Reminder: CPPS and CPPBL Timeline

- **March 2020** - Council direct staff to initiate the development of a CPPBL to support the implementation of the new OP, following its approval in 2019.
- **September 2020** – CPPBL development is launched after a public tender to retain a consultant to lead the project based on Council approval of staff’s recommendation to retain a consultant.
- **July 2022** – Council approves CPPBL after extensive research, consultation, and draft by-law iteration.
- **January 2023** – CPPBL comes into effect, following three site-specific appeals.

Project & Report Overview

Project Work Plan



Project Scope

This Review is focused on evaluation of the Town's CPPBL and CPPS processes. As a result, it does not significantly contemplate the effectiveness of current resourcing or fee structures within the Development Services Dept. beyond identifying implementation considerations related to resourcing for recommendations.

Methodology: Key inputs into this review include:

- **Current State:** Interviews with Council, CAO, and development industry stakeholders (10); and process mapping workshop and iteration with Development Services staff
- **Recommendations:** Staff recommendation-testing workshops (2); interviews with planning staff from Lake of Bays and Bracebridge; and a leadership validation workshop.
- **Final Report:** Review of corporate data and documentation, including the strategic plan, permitting data, staff reports, among others; relevant provincial legislation and regulatory changes; comparator by-laws; and leading practice and industry research.

Report Overview: This Final Report includes the following components:

- An overview of the Town's CPPS development and implementation to support understanding of the current state.
- A detailed overview of the preliminary findings from stakeholder feedback and data analysis outlining key successes and challenges and alignment to CPPS objectives and the legislative and operational factors shaping the CPPS.
- A detailed set of future state recommendations related to key policy and process improvements indented to better align the CPPS with its intended objectives and improve user experience.

Implementation & Evolutions of the CPPS

Over the past decade, the CPPS has gradually gained traction among Ontario municipalities as collective understanding of the tool has matured. When Huntsville approved its CPPBL in 2022, it was one of only a few municipalities to adopt the tool.² Today, a growing number of municipalities are exploring both limited and municipality-wide CPPS approaches and are looking to Huntsville as an innovation leader in how to implement, refine, and adapt the CPPS and supporting mechanisms to meet individual community needs.

Adapting the CPPS for the Huntsville Context

- **Town-Wide Approach from Outset:** The [2020 Background and Directions Report](#), highlighted challenges with the Lake of Bays experience, where geographically limited or phased implementation – CPPS for waterfront areas and traditional zoning elsewhere – created confusion and inefficiencies. Huntsville’s CPPBL was therefore applied across all lands in the municipality from inception as a means of mitigating these challenges.
- **Changes to the development standards in the new CPPBL were limited** to those updated in the 2019 Official Plan in order to support an incremental implementation approach and limit community impacts.
- **Transitional Mechanisms Built into the CPPBL:**
 - A “Development Precinct” designation was applied to settlement area lands not yet assigned a final precinct as a holding category pending further study.
 - Transition provisions (s.1.8) ensured that in-process applications were completed under the former by-law and subsequently incorporated into the CPP as site-specific amendments or permits.
 - Grandfathering provisions (s.1.9) recognized all site-specific zoning by-law amendments and minor variances granted after June 2, 2008, preserving existing permissions and avoiding non-conformity.
 - Holding provisions (s.10) were carried forward from the previous framework.

Supporting Implementation Activities

- The need for dedicated public education resources was identified during the development of the final draft and additional funding was allocated for materials, including a CPPBL Educational Booklet.
- A pre-consultation process was established as a mandatory first step for all planning applications as a means of aligning all parties on permit and application requirements early in the approvals process.

Ongoing Calibration

- Town staff have brought forward housekeeping amendments to the CPPBL and process changes informed by both staff-identified opportunities and stakeholder feedback. Amendments include By-laws [2023-36](#), [2024-64](#), [2024-82](#), [2025-52](#), [2025-83](#).
- These improvements have included allowing for permit exemptions for “minor works,” amendments to mapping, changes to pre-consultation meeting procedures, the planned introduction of online payments, among others.
- Staff continue to consult with members of the development community to understand ongoing challenges with the CPPS and identify solutions.

Why This Matters

In addition to introducing an entirely new permitting system, the CPPBL came into effect during a period of frequent provincial legislative change, which continues today. This context is critical. It helps explain how both structural design choices and external factors have shaped the current CPPS and its performance from a user perspective.

Concurrent Changes Associated with CPP Implementation

A key consideration in evaluating any major policy or regulatory change is the extent to which concurrent developments or external factors may shape stakeholder experiences. In Huntsville's case, several significant changes occurred simultaneously, making it difficult to isolate the specific effects of the CPPBL. As a result, establishing clear causal links between observed outcomes and the policy – as distinct from other potential confounding factors – remains challenging.

Introduction of CloudPermit for planning applications



- While the Town had already successfully implemented CloudPermit for building permits, the platform was introduced for planning permits concurrently with the CPPS.
- The new planning module was developed specifically for Huntsville through collaboration between staff and CloudPermit, as existing permit modules were not suited to the Town's needs.
- Overall, digitization has been a positive change for applicants and staff; however, the learning curve associated with the new by-law was intensified by the simultaneous rollout of new technology.

New standards for tree removal and site alteration introduced



- Prior to the implementation of the CPPBL, Huntsville had no regulatory oversight or restrictions on tree removal or site alteration. Following a number of high-profile cases, the Town's then Planning Committee directed staff to develop such controls.
- These new controls were introduced for the first time in the CPPBL, contributing to perceptions that the new framework and regulatory structure is inherently more prescriptive.

Redeployment of staff resources across municipal priorities



- Staff planning resources are often deployed dynamically to remain responsive to application demand. However, when application volumes are consistently high, advancing other department priorities often has downstream impacts on application review capacity and approval timelines.
- Two major recent Council-directed redeployments of staff capacity have included the in-house updates to the Height and Density Policy and the dedicated assignment of existing resources to affordable and long-term rental housing projects. This limits staff capacity to advance other components of their portfolios, including application review.

Provincial changes with uneven jurisdictional impact



- In 2022, Bill 23 removed site plan control for small-scale residential development with fewer than 11 units across Ontario.³ However, because CPPs operate under a separate legal framework, these changes did not automatically apply locally in Huntsville.
- In 2024, Bill 185 eliminated the ability of most municipalities to require pre-consultation. As with the changes noted above, this provision does not apply within the CPPS regulatory framework, allowing the Town to continue enforcing its pre-consultation requirements.

8 [3] The Province has since clarified exemptions for shoreline development for developments of fewer than 11 units, which applies broadly across Muskoka given the significant amount of shoreline development.

Overview of Findings on the CPPS

The implementation of the CPPS has created **several efficiencies** for both developers and the Town in the processing of planning approvals, while continuing to protect Huntsville's natural environment and community character in **alignment with its strategic priorities**, Official Plan, and provincial and District policies.

- **Reduction in number of individual permits per development.** Numerous case studies⁴ illustrate the streamlining benefits of combined approvals, including an overall reduction in fees for projects that would have previously required multiple permits to proceed.
- **New tools streamline development approvals and reduce uncertainty.** Provisional approvals facilitate earlier certainty for applicants before permits are issued, reducing project risk. Similarly, discretionary use provisions allow for additional permitting flexibility.
- **Elimination of separate Committee of Adjustment.** New streamlined Planning Council structure creates efficiencies for both staff and Councillors.

Current State Observations

The Town is not the sole authority over planning requirements and decisions. While staff are responsible for processing applications, making recommendations, and issuing certain delegated approvals, they must operate within the direction of provincial, District, and local planning policies. A limited shared understanding of how these policies constrain application requirements and staff recommendations – including which policies are within the Town's control and which are not – has contributed to perceptions that staff are overly cautious and procedural, with a greater emphasis on risk mitigation than efficiency.

Council supports development but are risk averse: Council is generally perceived as supportive of appropriate development based on its decision track record. However, this posture is not consistently reflected in the approved planning policies and by-laws, which staff are required to implement faithfully.

In some cases, Town requirements exceed provincial standards and do not reflect recent changes to the *Planning Act*. Many of the public notice and circulation requirements are established through the Council-approved CPPBL rather than District or provincial regulations. Similarly, recent provincial limitations on the municipal use of pre-consultation and site plan control have not yet been incorporated into Town policies.

Huntsville's natural features and geography make it inherently challenging to streamline development approvals. Provincial and District policies and mapping establish many minimum requirements for new development based on the presence of natural features and hazards. The prevalence of these constraints throughout Huntsville often limits staff's ability to further tailor permitting requirements to the scale and complexity of development proposals.

Poor communication of standards and expectations has contributed to conflicts among parties. While several measures have been introduced to establish clearer application standards, few are readily accessible to applicants at the outset of the process. For example, the adoption of clearer standards for technical studies has helped reduce disputes regarding study quality; however, limited easy access by the public to documentation continues to contribute to perceptions that requirements are applied arbitrarily.

The Town places significant emphasis on supporting development applications toward compliance. Many of the Town's seemingly duplicative or cyclical processes are intentionally designed to help applicants refine and iterate their proposals so they can ultimately be recommended for approval, rather than having non-compliant applications rejected and resubmitted. Balancing this level of customer support with operational efficiency remains an ongoing challenge.

Key Challenges with the CPPS

Implementation of the CPPBL has been iterative, and the Town continues to identify and implement changes to the By-law and associated processes in response to emerging issues raised by Council, staff, stakeholders, and legislative changes. However, several persistent challenges remain, alongside opportunities to strengthen the CPPS through more mature and efficient regulatory frameworks, processes, and standards that better support the system's intended outcomes. These challenges are further explored in the Preliminary Findings in Appendix A. The recommendations in this report are intended to address the key challenges summarized below.



Exemptions & Thresholds: The exemption framework was designed to enable straightforward development to proceed without a CPP, but broad environmental and mapping triggers defined by the province and District effectively narrow those exemptions, capturing most properties and projects back into the permitting process – even if only to confirm exemptions for “minor works.”



Opaque Upfront Application Requirements: To accommodate single permit approvals, detailed design proposals and technical studies are all required early in the development process to ensure that development is appropriately assessed, but these can also be drivers of cost and delay for applicants. While requirements are often scoped to project complexity, communications and transparency on mechanisms for calibrating requirements is limited, especially prior to application.



Clarity & Accessibility: While intended as a single, navigable approvals framework, the CPPBL is difficult to interpret without professional planning support. Additionally, the Town has limited supporting materials available for applicants, increasing reliance on staff assistance, particularly for inexperienced applicants. Although staff are generally seen as supportive, access to this kind of direct guidance is not always consistent. To manage staff capacity and competing departmental priorities, applicants are often directed to CloudPermit or the Town's website instead.



Delegation & Authority: The CPPS is intended to streamline approvals by delegating routine decisions to staff. In practice, applications that would otherwise be delegated to staff, can be escalated to Planning Council for resolution, because of disagreement with recommendations by applicants, residents, or Council, frustration with the narrowness or interpretation of thresholds, and misaligned expectations based on Council's decision track-record, regardless of written policies, by-laws, or strategic priorities.



Submission Quality & Validation: Staff and applicants are frequently misaligned on minimum application or technical study standards, often resulting in inconsistent early identification of application requirements, and costly re-work for both parties. The Town must often rely on assumptions, additional requests for documentation, site visits, and peer review to validate application materials and minimize risk generated from poor application quality.



Timelines & Accountability: CPPS regulations establish a 45-day statutory review period from the time the Town receives all required materials to issuing a decision to support faster, more predictable approvals. However, within Huntsville's processes, this timeline is not representative of the full user experience and permitting requirements.⁵ Delays accumulate across pre-consultation, submission review, and clerical tasks, and there are limited or inaccurate published service standards to guide applicant expectations.

10 [5] Because CloudPermit was introduced after the implementation of the CPPBL (and application data is only tracked through CloudPermit) the Town does not have sufficient historical data to evaluate the CPPBL's actual impact on overall permitting timelines.

What We Heard from Service Users

Local developers and members of Council were invited to share perspectives on how the CPPBL operates in practice, including the day-to-day experience of applicants. It is important to note that the feedback below reflects individual experiences across the full implementation period, including issues the Town has already identified and addressed through amendments to the CPPBL and internal process improvements.

What's working well?

- **The strategic direction and intent of the CPPS is recognized and broadly supported.** Stakeholders continue to endorse the concept of a single, integrated approval pathway aimed at reducing steps, fees, and improving coordination.
- **Digitization through CloudPermit has improved organization and visibility of the process.** Online submission, tracking, and checklists are widely viewed as beneficial, enhancing structure and visibility, despite some limitations in the tool's communication functionality.
- **Pre-consultation is valued when it is substantive and directional.** Stakeholders value pre-consultation when it involves the appropriate staff, offers clear guidance, and delivers reliable direction on what is needed to proceed with an application. The ability for applicants to deduct the cost of pre-consultation from resulting application fees in most cases is appreciated.
- **Staff are generally supportive when capacity allows.** Most stakeholders described staff as knowledgeable and collaborative, with few exceptions.

What are the major challenges?

- **Timelines and responsiveness are dominant pain points.** While there is broad agreement that the single-permit CPPS is more streamlined – especially for more complex applications – stakeholders generally do not perceive it as substantially faster than the previous system. Reported challenges include difficulty anticipating timelines, uncertainty around responsibility for advancing files, and slow response cycles.
- **The perceived “one-size-fits-all” approach disproportionately impacts smaller projects.** Despite application classes intended to scale application cost and requirements to development complexity, many stakeholders reported that the new system introduces additional requirements and longer timelines for smaller projects that may not previously have required permits. The CPPBL is also viewed as more difficult to navigate for non-professional applicants.
- **Application and study requirements are viewed as excessive, inconsistent, and insufficiently scaled to risk.** While many technical study requirements are mandated by provincial and District policies and mapping, stakeholders note that study requirements can seem unclear or overly broad in scope. Resulting challenges have included disputes between applicants and staff regarding study scope and quality, as well as the frequent need for peer review.
- **Intended delegation and process improvements of the CPPS are not consistently realized.** Factors such as staff caution, low risk tolerance, frequent escalation, and limited flexibility contribute to this gap. Communication from the Town is viewed as inconsistent, particularly regarding clarity of requirements, visibility of correspondence, and overall customer service orientation.

Overall, stakeholders generally agreed that persistent challenges are more closely related to inherent challenges of planning and development in Ontario that are experienced by most municipalities – and to the implementation of the By-law – than to the CPPS itself. Importantly, staff have continuously introduced CPPBL amendments and process improvements to address stakeholder concerns, including many of the issues identified by stakeholders.⁶

11 [6] A number of system improvements implemented since the CPPS was introduced are detailed further in section 1 of Appendix A.

Key Drivers and Constraints Guiding Evaluation & Recommendations

The challenges identified with the existing CPPBL and CPPS on the previous slides have been informed both by technical review and stakeholder feedback. Importantly, these challenges vary in the degree to which they are driven by regulatory or operational factors, which in turn impact the potential improvement or mitigation opportunities.

- **Regulatory Drivers:** Some issues are embedded in the regulatory text itself: rigid provisions, uniformly applied triggers, and gaps where the CPPBL is silent on matters that have become operationally significant.
- **Operational Drivers:** Other issues are rooted in how the CPPBL is administered. These include the internal practices, procedures, decision-making culture, technical capabilities, or supporting documentation and materials that shape day-to-day interactions with applicants.

Distinguishing between operational and regulatory drivers is important, as the pathways for reform differ.

Operational drivers can typically be addressed through internal process improvements, staff guidance, and administrative practice changes. This is work that can begin immediately, without formal amendments or Council approval.

By contrast, regulatory drivers require changes to the By-law, which may involve public consultation, Council deliberation, and potential appeal periods.

The relative impact of addressing operational versus regulatory drivers – include considerations related to user experience outcomes and implementation or resourcing costs – has been an important factor in determining how recommendations should be prioritized and implemented, as outlined on slide 13.

In considering the future of the Town's CPPS, it should also be observed that some drivers also function as constraints and may limit potential reforms:

- **Legislative frameworks:** Certain issues stem directly from Ontario's *Planning Act*, its regulations, and provincial policies. These include development review policies, prescribed terminology, legislated timelines, and minimum application requirements. The Town has limited flexibility to address these constraints without broader provincial changes.
- **Town-Established Policies:** Some issues stem from individual dis-satisfaction with established Council-approved policies (e.g., OP), which are designed to balance public and individual development interests. While the Town has some discretion over these policies, they are designed and informed by public input and should not be amended without it, leaving it outside the scope of the reforms identified in this Report.
- **Resourcing and capacity:** Existing staffing levels, available expertise, technology limitations, and the impact of increasing service demands on limited resources are also likely contributing to or amplifying current challenges with the CPPS. While the Town may wish to consider adjusting resource allocation in the future, any changes will need to be balanced against competing needs and strategic priorities and may therefore be constrained.⁷
- **Enterprise-wide coordination:** Reform impacts may also be constrained by broader enterprise-wide resourcing or coordination across Town departments. Planning approvals require cross-departmental coordination, and broader policy implementation requires support from other departments (i.e., communications, IT, GIS, etc.).

12 [7] Note: As this review does not include a detailed analysis of overall departmental resourcing – including staffing levels, workload distribution, and organizational structure – the ability to directly attribute CPPS challenges to resourcing or other operational factors is limited. Identifying additional operational improvements (e.g., expanding staff capacity) would require a broader assessment of departmental resourcing and capacity constraints.

CPPS Improvement Opportunities & Recommendations

This slide summarizes the five key improvement opportunities identified through this review, along with 18 specific recommendations and actions the Town of Huntsville should pursue. Each recommendation is described in greater detail in the following section.

Opportunity 1 | Improve pre-consultation consistency, clarity, and value

1. Remove pre-consultation requirements for more basic applications.
2. Introduce a formal “planning inquiry service.”
3. Increase standards for pre-consultation requests.
4. Establish a clear application process for CPP exemptions.

Opportunity 2 | Improve permit application quality

5. Conduct a plain-language review of existing application materials.
6. Improve access to existing application information and standards.
7. Develop online resources to support CPPBL interpretation.
8. Review current Terms of Reference for opportunities to tailor requirements to Huntsville’s context.

Opportunity 3 | Streamline application processing, review and issuance

9. Remove public notice requirements for Class 2 permits.
10. Establish a consent agenda for some Class 3 permit approvals.
11. Explore opportunities to expand the Town’s environmental compliance capabilities.
12. Cumulative application review and permitting process efficiencies.
 - i. Explore assignment of pre-consultations and applications to staff resources by permit type.
 - ii. Implement standard check-points for Manager, Senior Planner, and quality assurance review.
 - iii. Further delegate sign-off on planning approvals to the Manager of Planning and quality review to senior planners.
 - iv. Increase frequency of circulation cycles.
 - v. Eliminate manual and redundant signature requirements on permits.
 - vi. Amend appeal waiver requirements for permit issuance.
13. Enhance CloudPermit functionality.

Opportunity 4 | Calibrate CPPLB triggers and exemptions to risk

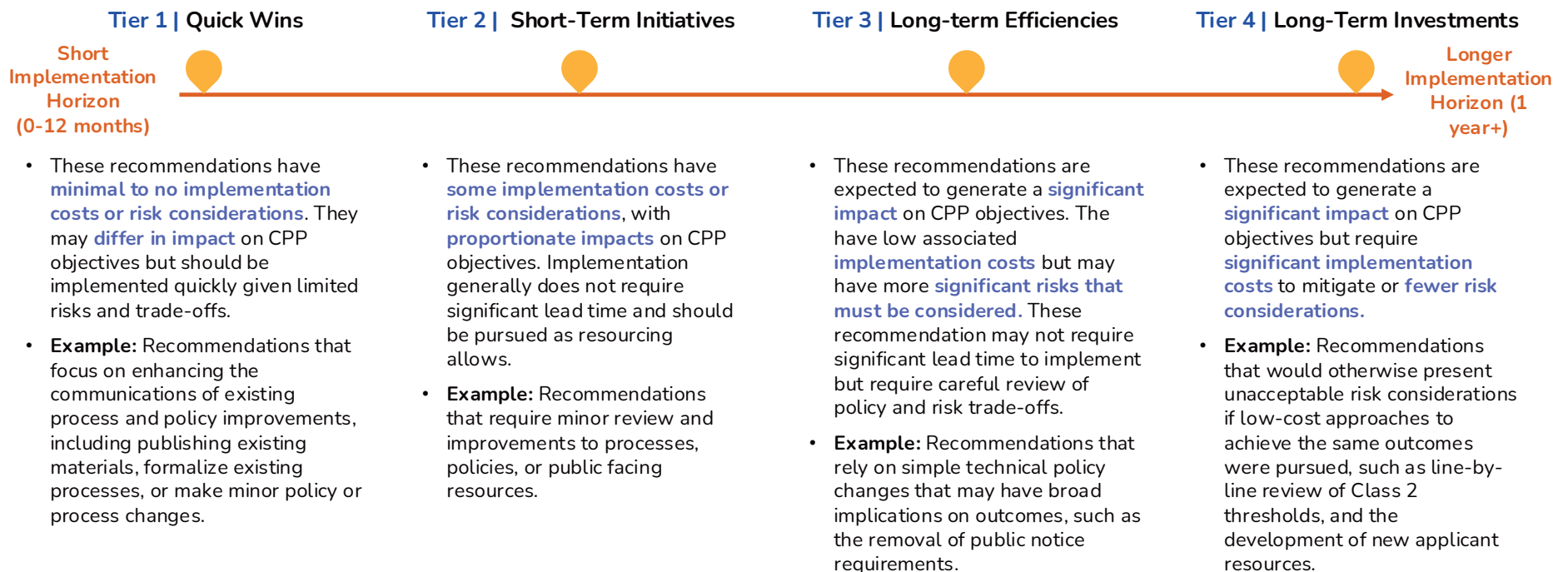
14. Assess variations thresholds across Class 2 and 3 boundaries.
15. Evaluate the risks and opportunities of introducing expiration provisions for undeveloped site plan agreements.
16. Coordinate mapping and policy updates and adjustments with the District.

Opportunity 4 | Establish service standards and accountability structures

17. Establish customer service standards.
18. Expand annual performance reporting.

Implementation Roadmap

Each recommendation has been assessed based on its relative impact on the Town's CPP objectives, implementation cost (e.g., staff time or additional funding), and associated risks to inform prioritization. The continuum below outlines the key trade-offs likely to influence or inform how quickly recommendations should be advanced.



Opportunities & Recommendations

There are five high-level opportunity areas supported by 18 individual recommendations.

For each recommendation, this section outlines:

- *Description & Rationale:* The evidence base supporting the recommendations, including preliminary findings, key risks or gaps being addressed, expected benefits to the Town, legislative grounding, and alignment with comparator municipalities and leading practices where applicable.
- *Implementation Considerations:* An outline of the delivery mechanism and actions necessary for each recommendations, estimated resourcing implications, including staff time and budget allocations where possible, and key dependencies with other initiatives or corporate projects.

Opportunity 1 | Improve pre-consultation consistency, clarity, and value (1/3)

Recommendations

These recommendations create distinct pathways for applicants seeking guidance ahead of a formal permit application based on proposal details and maturity (i.e. how far along in the design process a proposal is).

1. Remove pre-consultation requirements for more basic applications.
2. Introduce a formal “planning inquiry service.”
3. Increase standards for pre-consultation requests.
4. Establish a clear application process for CPP exemptions.

1. Remove pre-consultation requirements for more basic applications.

Description: It is recommended that the Town only require formal pre-consultation for applications for commercial, industrial, mixed-use, and multi-residential developments, properties along District roads, or properties within Ministry of Transportation (MTO) control areas.

Rationale: The Town’s current CPPBL requires all those seeking a CPP to first complete formal pre-consultation to review proposals, confirm the property location, proposed use, applicable by-law provisions, required studies, and application class. Scaling back this requirement will allow the Town to begin to align its pre-consultation requirements more closely with those the Province has instituted through Bill 185.

Pre-consultation, including a formal pre-consultation meeting, will continue to be available to any applicant who requests it. The Town’s existing progressive fee structure, which allows the cost of pre-consultation to be deducted from the application fee for the subsequent permit application, is expected to continue incentivizing pre-consultation for those who will benefit most.

Implementation: This recommendation requires that the Town amend section 1.16.1 of the CPPBL.

2. Introduce a formal “planning inquiry service.”

Description: It is recommended that the Town introduce a distinct “planning inquiry service” that allows applicants to book a scheduled meeting with a planner, or planning technician where appropriate, to ask clarifying questions or seek design support before submitting a pre-consultation request or application.

Rationale: Pre-consultation is intended to provide direction to applicants based on an established proposal or design; it is not optimized to provide applicants with early direction on how to develop a proposal that aligns with Town requirements.

Some applicants enter the pre-consultation phase without having the necessary proposal maturity in place to realize value from the process. While staff currently field early questions from applicants informally, this approach can be inconsistent for applicants and result in unscheduled demands on staff time.

Formal inquiry services exist in other municipalities⁸ to provide applicants with clear channels based on the maturity of their proposals. This ensures applicants receive an in-person meeting when they need one and allows staff to plan around scheduled inquiries rather than absorb them as interruptions.

Implementation: Such inquiry services are often offered at no cost, or for an hourly fee, to support proportional cost recovery. Until the Town has a better understanding of service demand, no fees should be charged for planning inquiries. This service must therefore be clearly scoped so that it does not become a substitute for pre-consultation. Applicants with questions relating to complete-application content, study scoping, or multi-agency coordination should be directed to pre-consultation.

Other existing support services (e.g., formal letters, site visits, etc.) would continue to have approved fees applied.

16 [8] Examples of Planning Inquiry Service in Ontario include [Town of Caledon](#), [Municipality of West Grey](#), and [Bruce County](#).

Opportunity 1 | Improve pre-consultation consistency, clarity, and value (2/3)

3. Increase standards for pre-consultation requests.

Description: It is recommended that the level of detail and information required at the pre-consultation phase be enhanced to include, at a minimum, a completed pre-consultation form, a detailed site plan drawing meeting provincial standards, and property photos showing existing site conditions and access.

Rationale: Town staff must frequently spend significant time gathering basic information about the property and proposal in response to poorly detailed requests. Ensuring that all necessary detail is provided by the applicant creates processing efficiencies for staff and improves the accuracy of pre-consultation outcomes.

Applicants struggling to provide the necessary detail at the pre-consultation stage because they do not yet have a mature proposal should be redirected to the planning inquiry service. Others who do not meet minimum request standards should have their request returned with instructions identifying the missing details.

Implementation: Successful implementation of this recommendation will require improved communication and enforcement of minimum standards and expectations, as well as the introduction of alternative inquiry pathways. It will require the Town to ensure that up-to-date requirements are clearly communicated on the Town's webpages and in the CloudPermit system itself. However, updates to CloudPermit's pre-consultation workspace will be minimal, as key functionality, including document and photo uploads, is already supported.

Standards should be reviewed after twelve months of operation to confirm that they are producing higher-quality pre-consultation discussions without creating an accessibility barrier for applicants.

4. Establish a clear application process for CPP exemptions.

Description: Clarify and better communicate the conditions and application pathways through CloudPermit for applicants seeking to confirm Section 1.3 permit exemptions or to acquire a "minor works" exemption.

Rationale: In response to feedback from staff and applicants, the "minor works" exemption was introduced to help streamline smaller development applications at the discretion of the Director. Both "minor works" and Section 1.3 exemptions are currently acquired through the pre-consultation process.

In practice, there are relatively consistent conditions that define "minor works," including developments occupying already-built portions of a property; developments no closer to a constraint than an existing structure; decks, docks, and garages on already-developed lots in good shoreline condition; and industrial or commercial redevelopment by scale. These qualifying conditions reflect current operational practice but are not publicly posted.

Publishing these conditions and creating a distinct application channel would give applicants a clear indication of whether their project may qualify, reduce the volume of applicants entering the full CPP process unnecessarily, and create a clear pathway for applying for the exemption distinct from pre-consultation.

Implementation: This recommendation requires that the Town publish the qualifying conditions for "minor works" in public-facing educational materials. A clear disclaimer that compliance with the published conditions does not guarantee that a project will be deemed "minor works" is required to ensure ongoing discretion and alignment with existing by-law language.

An additional clear application channel in CloudPermit for exemption requests requires no substantial changes to internal processes and only minor platform adjustments to improve clarity for applicants, which should be confirmed under existing service agreement with CloudPermit.

Opportunity 1 | Improve pre-consultation consistency, clarity, and value (3/3)

Implementation Outcomes, Cost & Risks

Recommendation	Implementation Priority	Anticipated Impact	Implementation Cost	Risks & Considerations
1. Remove pre-consultation requirements for more basic applications.	Tier 1 Quick Win	Low – Moves Huntsville’s CPPBL more inline with provincial regulation for similar planning tools.	Low – Requires By-law amendment.	Low – The Town’s fee structure will continue to incentivize pre-consultation where beneficial.
2. Introduce a formal “planning inquiry service.”	Tier 2 Short-Term Improvement	Medium – Improves clarity and service levels for applicants.	Medium – May increase demand on staff without proportionate cost recovery.	Low – Compliance-related risks may decrease due to improved clarity for applicants.
3. Increase standards for pre-consultation requests.	Tier 2 Short-Term Improvement	Medium – Improves clarity and predictability through more accurate pre-consultation outcomes and streamlined proposal review.	Low – Requires the publication of revised standards.	Medium – Increased risk of unaccepted requests, mitigated through new service channels (i.e., planning inquiry service).
4. Establish a clear application process for CPP exemptions	Tier 1 Quick Win	Medium - Improves clarity and predictability for applicants.	Low – Requires the publication of existing conditions and a new CloudPermit channel.	Low – Existing Director discretion is preserved.

Opportunity 2 | Improve permit application quality (1/3)

Recommendations

These recommendations are designed to support applicants in developing clear and complete applications that improve application processing outcomes and require less staff review time.

5. Conduct a plain-language review of existing application materials.
6. Improve access to existing application information and standards.
7. Develop online resources to support CPPBL interpretation.
8. Review current Terms of Reference for opportunities to tailor requirements to Huntsville's context.

5. Plain-language review of existing application material.

Description: Review all planning application forms and the corresponding CloudPermit interfaces to identify opportunities to use simplified language or provide additional explanatory notes.

Rationale: Through the engagement for this project, staff and stakeholders reported that applicants, especially those without a professional planning or development background, often have challenges interpreting application form fields that rely on technical terms and jargon.

Application forms and online instructions are the first point of contact most applicants have with the planning process. Where the language is unclear, applicants make avoidable errors and submit incomplete applications, which generates rework for both the applicant and staff.

Implementation: While minor, this review would require staff time and should be done in collaboration with staff who handle intake daily, to identify where applicants most commonly encounter challenges. Retention of a consultant may be warranted if incorporated into a broader review of all CPP communication materials. Updates to CloudPermit fields would also be needed (Recommendation 13).

6. Improve access to existing application information and standards.

Description: All existing application quality standards and supporting information should be made available in a centralized and navigable format on the Town's website. A new Standard Operating Procedure (SOP) should be developed to support the revision of online content when policy or process changes occur.

Rationale: Public-facing resources have not always kept pace with the substantive updates the Town has made since the CPPS came into effect. This creates an information gap between what staff are applying and what applicants and stakeholders understand to be required, generating unnecessary disputes.

While these resources are often directly provided to applicants as they proceed through the application process, none of the following documentation is readily available to applicants in a centralized location (e.g., the website):

- Site plan drawing standards, as legislated by the province.
- Terms of Reference for technical studies, as adopted from the District.
- Up-to-date mapping, including flood mapping, fish habitat, etc.
- Qualifying conditions for the "minor works" exemption (Recommendation 4).

Access to this type of documentation, along with improved communication of CPPS updates in standard materials, will help set expectations early and inform applicants of policy and process changes implemented since previous applications, supporting the overall improvement of application quality.

Implementation: This is a comparatively low-cost initiative that requires some upfront redeployment of staff to publish existing standards and information and develop an SOP. However, sustained implementation will require ongoing administrative capacity and coordination with other departments to support maintenance and updates. Ideally, a single staff member would be responsible for the update workflow, with clear escalation when capacity is constrained.

Opportunity 2 | Improve permit application quality (2/3)

7. Develop online resources to support CPPBL interpretation.

Description: Develop new educational and communication resources, and update existing ones, to support applicants in interpreting the CPPBL and application processes relevant to common types of development.

Rationale: First-time applicants and smaller-scale applicants are often most affected by the absence of clear examples and accessible guidance. They may not understand what a complete submission looks like, leading to incomplete applications, multiple rounds of revisions, and a poor service experience.

Structured and well-designed online resources should help guide applicants through the requirements for each application type. These resources might include completeness checklists by application class, plain-language guides explaining the difference between a CPP and a building permit, model submission examples, or the long-planned Shoreline Residential Development Guide, which staff have been unable to prioritize due to competing priorities.

Implementation: The creation of new and updated educational materials is a time-intensive task that has long been a staff priority but remains incomplete due to limited capacity and competing demands. Additional capacity, potentially through a third party, will be necessary to implement this initiative without significant impacts on application processing timelines. If no additional capacity is acquired, resource development should be sequenced so that the highest-volume application types are addressed first.

As demonstrated by the Town's experience with the Site Plan Control Guidelines, these types of resources can become outdated without regular maintenance and contribute to poor application quality. The SOPs described in Recommendation 6 will be critical to ongoing success.

8. Review current Terms of Reference for opportunities to tailor requirements to Huntsville's context.

Description: Conduct a review of all technical studies listed in Appendix A of the CPP By-law to identify which Terms of Reference (ToR) require updates to reflect current local practice, and which study types do not yet have an associated ToR.

Rationale: The Town has recently adopted a number of standard ToRs developed by the District for most types of technical studies. These ToRs give applicants a clear understanding of study expectations and staff a written standard to point to when a submitted study falls short. This reduces conflict with applicants and limits the need to incur the cost of peer review on quality grounds. Where no ToR exists, the same studies can generate predictable disputes that consume both staff and applicant time.

However, as other Muskoka municipalities that have adopted these ToRs have experienced, some of the District's ToRs may not reflect the most up-to-date instructions or may not be well-suited to Huntsville's physical and operational contexts. Some studies, including slope stability studies and visual impact studies, do not have any ToR available.

While these documents provide a substantial starting point for most applicants, and the Town will likely always need to apply some individual scoping on an ad-hoc basis, updates would support ongoing standardization and communication.

Implementation: The Town should advocate for this work to be led by the District in partnership with all Muskoka municipalities. Where gaps are identified that cannot be addressed promptly at the District level, the Town may develop interim, locally specific Terms of Reference (ToR) for its own use while identifying those gaps for future District-led review. This work may require the redeployment of staff resources, as needed.

Opportunity 2 | Improve permit application quality (3/3)

Implementation Outcomes, Cost & Risks

Recommendation	Implementation Priority	Anticipated Impact	Implementation Cost	Risks & Considerations
5. Plain-language review of existing application material.	Tier 2 Short-Term Improvement	High - Improved clarity and predictability for applicants.	Medium – Some staff redeployment or consultant fees.	Low – Compliance related risks may decrease due to improved clarity for applicants.
6. Improve public and central access to existing application information and standards.	Tier 1 Quick Win	Medium - Improves clarity and service levels for applicants and streamlines application processing.	Medium – Requires the publication of existing content and ongoing maintenance.	Low – Compliance related risks may decrease due to improved clarity for applicants.
7. Develop online resources to support CPPBL interpretation.	Tier 4 Long-Term Investments	High - Improves clarity and service levels for applicants and streamlines application processing.	High – Requires significant additional resourcing to implement.	Low – Compliance related risks may decrease due to improved clarity for applicants.
8. Review current Terms of Reference for opportunities to tailor requirements to Huntsville’s context.	Tier 4 Long-Term Investments	High - Improves clarity and service levels for applicants and streamlines application processing.	Medium – Requires significant additional resourcing to implement but could be led using District resources.	Low – Compliance related risks may decrease due to improved applicability of materials.

Opportunity 3 | Streamline application processing, review and issuance (1/7)

Recommendations

These recommendations aim to reduce the total number of hand-offs and re-work as part of the review and issuance of permits. The first three recommendations are significant policy-driven process improvements:

9. Remove public notice requirements for Class 2 permits.
10. Establish a consent agenda for some Class 3 permit approvals.
11. Explore opportunities to expand the Town's environmental compliance capabilities.

The remaining two recommendations encompass multiple minor process efficiencies that do not require any technical policy changes. These improvements are grouped together as a single recommendation as implementation of any single change is unlikely to generate appreciable impacts; however, when taken cumulatively, they are likely to generate processing time and/or cost saving:

12. Cumulative application review and permitting process efficiencies.
 - i. Explore assignment of pre-consultations and applications to staff resources by permit type.
 - ii. Implement standard check-points for Manager, Senior Planner, and quality assurance review.
 - iii. Further delegate sign-off on planning approvals to the Manager of Planning and quality review to Senior Planners.
 - iv. Increase frequency of circulation cycles.
 - v. Eliminate manual and redundant signature requirements on permits.
 - vi. Amend appeal waiver requirements for permit issuance.
13. CloudPermit functionality enhancements.

9. Remove public notice requirements for Class 2 permits.

Description: It is recommended that the Town revise its public notice requirements for Class 2 CPP applications to remove the formal public commenting period and signage requirements. Class 2 application details should be made available on the Town's website and upon request for information only.

Rationale: The inclusion of public notice requirements for Class 2 CPP applications was not included in early drafts of the CPPBL as it is not a provincial requirement for these types of minor variations that are typically quite technical. Public notice requirements were included in subsequent drafts of the By-Law to respond to resident concerns that the new CPPBL would not allow for sufficient community engagement with the loss of appeal rights.

In practice, few Class 2 applications submitted since the CPPBL was introduced have received substantive public input that affects permitting decisions. Conversely, Class 2 permit applications consistently experience the greatest processing delays and disproportionately long approval timelines.

This recommendation could reduce individual processing timelines by up to two weeks by removing the commenting window during which applications cannot proceed, while also streamlining decision and permitting stages by reducing the number of additional permit amendments and reviews following that period.

As is currently the case, Class 2 permits that staff cannot move forward for approval under the Class 2 framework, would still be escalated to Class 3 for Council review. Under the new model, these escalated applications would need to go through the complete public comment period as is required under the Class 3 framework.

(continued on next slide)

Opportunity 3 | Streamline application processing, review and issuance (2/7)

9. Remove public notice requirements for Class 2 permits (cont.)

Implementation: A CPPBL amendment to Section 1.19 and Table 1.3 would need to be drafted to remove the public notice requirements currently applicable to Class 2 permits, beyond the posting of active applications on the Town's website. The amendment should be accompanied by a formalized process for publishing Class 2 application information online, along with a clear mechanism for interested parties to request notice of specific applications.

Given that this initiative arose from public input on the CPPBL, engagement on the proposed amendment should explain the limitations of the current public consultation process and reaffirm the continued ability to escalate applications to Class 3, where appropriate.

10. Establish a consent agenda for some Class 3 permit approvals.

Description: It is recommended that the Town introduce a consent agenda for Planning Council meetings to handle Class 3 applications that have completed the public notice period without objection or comment and for which staff are recommending approval. Applications on the consent agenda would be approved collectively by motion at the outset of the meeting, without staff presentation or detailed discussion unless a delegation is requested by the applicant or a member of the public. Any member of Council would retain the ability to remove an application from the consent agenda for full discussion during the same meeting.

Rationale: Class 3 CPP approvals are delegated to Planning Council in the CPPBL,⁹ requiring staff to present all relevant application details, public comments, and final recommendations for each application considered at a meeting. Both staff and Council have indicated that many Class 3 applications that proceed without public objection or comment – and for which staff are recommending approval – should not be overly scrutinized.

Rationale (cont.): Even these comparatively straightforward Class 3 applications require significantly more staff time to prepare recommendations than Class 2 permits and contribute to longer Planning Council meetings for Council, staff, and participants. Preparing materials for Class 3 applications tied to fixed Council meeting dates is also frequently cited as a source of processing delays for other permit classes, particularly Class 2 permits.

However, as discussed in Recommendation 9, it may not be prudent to broadly increase delegated approval thresholds to staff, as the overall user experience and approval timelines for Class 3 permits are generally better than those for staff-delegated Class 2 permits. The consent agenda mechanism would preserve Council's substantive role in complex or contested Class 3 applications while streamlining staff preparation requirements and reducing meeting length for uncontested files, without altering Council's delegated authority. This change should maintain existing approval timelines for Class 3 permits while enabling staff to redirect time currently spent preparing Council presentations toward advancing other permit classes. Longer term, the Town could explore delegating approval of Class 3 permits without comment or objection to staff.

This is a relatively novel approach, as most applications under traditional planning tools are subject to public meeting requirements that cannot be satisfied through a consent agenda process. However, because CPP regulations do not require a public meeting as defined under the Planning Act, the Town has the discretion to streamline the review of these applications.

Implementation: The Town's Procedural By-law would need to be amended to permit applications to be approved through a single consent agenda item and to establish eligibility criteria and related procedural rules, including possible deferral of items pulled for discussion where additional information is requested. New SOPs governing the staff report requirements for consent agenda items would also need to be defined.

Opportunity 3 | Streamline application processing, review and issuance (3/7)

11. Explore opportunities to expand the Town's environmental compliance capabilities.

Description: The Town should explore the potential costs and benefits of options for developing a stronger environmental compliance function, either within the Town or at the District level, to support environmental review of applications, peer review of environmental studies, and technical advice on environmental policy questions arising during the planning process.

Rationale: The District of Muskoka does not have a conservation authority, meaning Huntsville lacks access to the in-house environmental review capacity that conservation authorities typically provide to lower-tier municipalities elsewhere in Ontario.

Studies are typically commissioned by applicants from professional vendors, but these services do not have associated professional designation standards to support verification of study quality or findings without peer review by Town staff or a third party with relevant expertise. This has contributed to variability in study quality and in how environmental considerations are applied across files. While the adoption of District Terms of Reference has supported improved consistency in these types of studies, gaps in the Town's in-house technical expertise mean peer review is still necessary in some cases.

Expanded capabilities in this area would align with the Town's strategic priorities around environmental planning and sustainable development, and ensure both environmental policies, and their application are optimized. Having in-house capacities would also potentially streamline individual application processes and timelines by limiting the need for external review cycles

Implementation: A feasibility study would likely be required to explore alternative service delivery models including expanded in-house capacity or contracted external review, with the Town's current peer review process continuing until any new arrangement is operationally proven.

As environmental protection is a strategic priority not only for Huntsville but also for many neighbouring communities, there is an opportunity to share the costs of expanded environments capacity with other Muskoka municipalities. This could include advocacy for a District-led service or other more direct delivery models, such as a shared environmental planning staff resource serving Huntsville and other Muskoka municipalities through shared service agreements, or a Town-led model that other municipalities could opt into.

There are likely costs and benefits to each delivery model, and a comprehensive review would need to be conducted to identify and test the feasibility of various options. A District resource may require less operational overhead for the Town but may not guarantee service levels. A shared resource with one or two neighbouring municipalities would provide more direct improvement in service levels without the cost of a full-time hire being borne entirely by the Town.

Note that these options require the Town to coordinate with other local governments to assess interest and negotiate potential shared service agreements and cost-sharing models.

Opportunity 3 | Streamline application processing, review and issuance (4/7)

12. Cumulative application review and permitting efficiencies

This recommendation includes several minor process improvement across the application submission, application review, and decision & permitting stages of the CPP process. While the impact of any single improvement may be negligible, collectively they could support meaningful gains in processing efficiency and overall timelines.

Initiative	Description	Rationale	Implementation
i. Explore assignment of pre-consultations and applications to staff resources by permit type.	Assign incoming pre-consultations and applications to staff by anticipated permit type, so that each permit class has dedicated resources assigned to those workstreams, in conjunction with existing assignment of minor and major developments.	The Town currently relies on all staff to support the review of multiple application types to help prioritize limited hand-off between pre-consultation and application. This contributes to delays on Class 2 applications when Council deadlines or simpler applications take precedent. Workstreams would help ensure all application types are continuously being advanced without being displaced by other priorities that have not be designated by Council (e.g., housing applications) and improve consistency by limiting variation in the files staff must process.	Staff are generally accurate in identifying permit class at the intake stage and should be responsible for directly assigning new pre-consultation requests. The weekly planning meeting could be leveraged to adjust assignments based on workload and revisions to application classes on an as-needed basis to support the minimization of application hand-offs and individual backlogs.
ii. Implement standard check-points for Manager, Senior Planner, and quality assurance review.	Concentrate substantive senior review at the Notice of Application stage. Subsequent review cycles for quality of resulting planning notices and materials should leverage administrative or peer review calibrated to file risk.	Concentrating substantive review at the Notice of Application stage reduces redundant review at later stages where the substantive analysis has already been completed. Calibrating later review to quality risk directs staff time to the files where it adds the most value. Standardizing leadership review at this early stage also reduces the likelihood of new application requirements being identified well into the Application Review stage ultimately encouraging a better user experience.	This initiative does not require any policy changes, but may require staff to establish new SOPs for identifying the appropriate level of senior staff review. Staff have also indicated ongoing investigation into Laserfiche tools to automate the development of key planning documents generated from an approved Notice of application or checklist, which would further streamline the need for multiple review cycles.

Opportunity 3 | Streamline application processing, review and issuance (5/7)

12. Cumulative application review and permitting efficiencies. (cont.)

Recommendation	Description	Rationale	Implementation
iii. Further delegate sign-off on planning approvals to the Manager of Planning and quality review to Senior Planners.	Delegate staff approval authority for CPPs to the Manager of Planning and further delegate routine quality review of routine planning materials from the Manager to senior planning staff, with peer review across the team where appropriate.	Routine sign-offs at the Director-level add process hand-offs without contributing substantive value. Multiple content and quality review cycles by the Manager currently contribute to bottle necks across files. Senior planners have the technical capability to handle quality review on most files. The proposed delegation cascade frees the Director and Manager for substantive review and complex files.	The proposed delegation framework is already the standard for backfilling leadership roles during vacations or absences. No formal policy changes required, though adjustments to existing informal review protocols would be needed.
iv. Increase frequency of circulation cycles.	Move from twice-monthly to weekly application circulation cycles for internal, upper-tier, or external agency review and comments.	The current twice-monthly circulation schedule creates predictable calendar-driven delays. Weekly circulation cycles reduce the maximum potential delay by up to a week without significantly increasing coordination efforts.	No formal policy changes required. Adjustments to informal SOPs are not anticipated to require additional staff time.
v. Eliminate manual and redundant signature requirements on permits.	Remove resident signature requirements on final, non-provisional permits, and transition to integrated e-signature tools in CloudPermit for approval authority sign-off on permits.	The Town currently uses a separate digital tool for collecting signatures on permits that create a number of redundant administrative steps that could be centralized in CloudPermit to help accelerate permit issuance. Additionally, requiring applicant sign-off on approvals before permits can be issued does not add value, and can occasionally result in significant delays driven by applicant non-responsiveness.	No formal policy changes required. Coordination with CloudPermit may be needed to integrate revised workflows. Existing DocuSign tools will continue to be used for formal development agreements requiring both parties' signatures.

Opportunity 3 | Streamline application processing, review and issuance (6/7)

12. Cumulative application review and permitting efficiencies. (cont.)

Recommendation	Description	Rationale	Implementation
vi. Amend appeal waiver requirements for permit issuance.	Discontinue the practice of requiring applicants to sign appeal period waivers as a condition permit issuance before the appeal period has elapsed, or combine applicant permit signature with waiver.	The current practice of collecting appeal period waivers adds an administrative step that adds minimal risk mitigation benefit. An applicant intending to appeal is still bound by the conditions of an issued permit unless and until it is overturned. Removing the waiver reduces steps to issuance and limits the risk of delays resulting from applicant non-responsiveness.	No formal policy changes required. The Town may wish to seek legal advice before changing standard procedures to confirm any cases where a waiver should be retained.

13. Enhance CloudPermit functionality.

Description: Pursue a coordinated set of CloudPermit functionality enhancements that support multiple recommendations across this report. Enhancements for consideration include:

- Configuring the platform to carry forward pre-consultation data into draft applications.
- Developing pre-consultation templates selectable by proposal type.
- Integrating custom GIS layers such as District roads and MTO control areas to automate intake triggers.
- Permit conditions tracking.
- Account verification in place of some e-signatures.
- Updating field labels and instruction text on application forms (recommendation 5).

Rationale: CloudPermit is the Town's existing planning application platform, and several recommendations across this report depend on CloudPermit configuration changes to deliver their intended value. Pursuing these changes as a coordinated initiative, rather than on a file-by-file basis, would allow the Town to scope and budget the work comprehensively, coordinate CloudPermit account manager engagement more efficiently, and address interdependencies between enhancements in a cohesive manner. The platform's published functionality supports each enhancement as a standard product feature rather than custom development, indicating that the work would primarily involve system configuration rather than new development.

Implementation: Engaging CloudPermit's account manager to scope the full suite of configuration changes identified throughout this report and develop a coordinated implementation plan falls beyond the scope of the Town's existing contract with CloudPermit and would likely involve one-time fees and staff coordination time. Smaller configuration changes may, however, be achievable within the existing service agreement.

Opportunity 3 | Streamline application processing, review and issuance (7/7)

Implementation Outcomes, Cost & Risks				
Recommendation	Implementation Priority	Anticipated Impact	Implementation Cost	Risks & Considerations
9. Remove public notice requirements for Class 2 permits.	Tier 3 Long-Term Efficiencies	High – Reduces approval timelines.	Low – Requires public consultation and adoption of a CPPBL amendment.	Medium – While the change is unlikely to result in meaningful changes to how public input is considered, this change may draw concern from stakeholders.
10. Establish a consent agenda for some Class 3 permit approvals.	Tier 1 Quick Win	Medium – Reduces approval timelines and streamlines review processes for Council and staff.	Low – Requires procedural change for Planning Council.	Low – Council retains authority on the same files, with the ability to remove any file from consent.
11. Explore opportunities to expand the Town’s environmental compliance capabilities.	Tier 4 Long-Term Investment	Medium – Streamlines review, improves clarity and predictability for applicants, and better aligns outcomes with environmental objectives.	High – Even with a cost-shared model, sustained new funding contribution is required.	Low – Compliance related risks and approval delays may decrease due to added in-house expertise.
12. Cumulative application review and permitting process efficiencies.	Tier 1 Quick Win	Medium – Reduces approval timelines and streamlines review processes.	Low – Minor adjustments to internal processing SOPs and legal review as needed.	Low – Proposed adjustments primarily only increase risk tolerances for processes with limited risk to begin with.
13. Enhance CloudPermit functionality.	Tier 2 Short-Term Initiative	Low – Streamlines review processes.	Medium – One-time fees and staff time to coordinate configurations.	Medium – Delegation and review changes require clear documentation to maintain consistency and accountability.

Opportunity 4 | Calibrate By-law triggers and exemptions to risk (1/3)

Recommendations

These recommendations aim to realign development provisions and permitting requirements with actual development risk and provincial direction.

14. Assess variation thresholds across Class 2 and 3 boundaries.
15. Evaluate the risks and opportunities of introducing expiration provisions for undeveloped site plan agreements.
16. Coordinate mapping and policy updates and adjustments with the District.

14. Assess variation thresholds across Class 2 and 3 boundaries.

Description: It is recommended that the Town conduct a structured, line-by-line review of specific Class 2 and Class 3 thresholds in the CPPBL to identify provisions where the current thresholds are producing more friction than is warranted by the underlying planning risk. The review should both selectively increase thresholds, where a higher threshold would still protect the planning interest, and clarify threshold interpretations, where the existing language often leads to interpretive disputes between staff and applicants.

Rationale: Stakeholders and staff have identified provisions where the Class 2 and Class 3 boundary is producing friction, either because the provision is considered inappropriate or because of disputes over technical interpretation, (e.g., the way dock length is measured relative to the shoreline). While blanket threshold increases were considered in this review, this approach could increase the risk of poor planning outcomes in some cases, while failing to extend certain provisions sufficiently in others. Examples of these provisions include those for setbacks, docks, garages, parking, and loading space, where relative or absolute increases may be appropriate.

Rationale (cont.): A targeted review is likely necessary to ensure that each provision is evaluated on its own merits. It also gives Council a file-level basis for any threshold changes, rather than asking Council to approve a wholesale increase that would push more files into the Class 2 stream, which is currently significantly slower than the Class 3 stream. Interpretive clarifications will also support communication and predictability for applicants.

This would also allow the Town to consider the Province's new as-of-right framework for variations of up to 10% of certain quantitative standards introduced in Bill 17 in 2025. Applying a comparable as-of-right approach to Class 1 variations under Huntsville's CPPBL would remove a category of low-stakes variations from the Class 2 application stream and bring the Town's framework into alignment with provincial direction.

Implementation: This initiative constitutes a substantive policy review that would require substantial redeployment of staff resources, with impacts on processing timelines, or, alternatively, investment in third-party planning and legal advisors to lead or support the review. Recommendations for variations must consider the Town's OP, comparator analysis, relevant case law, and the tests for minor variances in Ontario. In many cases staff are already best positioned to identify and recommend amendments based on these considerations, based on their local expertise.

A final report on recommended threshold increases, threshold clarifications, or alignment with the provincial as-of-right framework under Bill 17 would need to be presented to Council for review, with any resulting changes brought forward as a CPPBL amendment for Council adoption.

Opportunity 4 | Calibrate by-law triggers and exemptions to risk (2/3)

15. Evaluate the risks and opportunities of introducing expiration provisions for undeveloped site plan agreements.

Description: Evaluate the introduction of a defined expiry period for site plan approvals registered on title, in accordance with the “use it or lose it” powers the Province introduced through Bill 185 (2025).

Rationale: Site plans registered on title without a defined expiry create a long tail of legacy approvals that may no longer reflect current site conditions, policy direction, or the property owner’s current intentions. As properties change hands and the policy framework evolves, old site plans on title can create confusion, generate disputes about what is and is not permitted, and create administrative complexity for applicants seeking new approvals on the same property. Huntsville has had several recent instances of old site plan agreements “resurfacing” despite no longer complying with active policy.

Bill 185 introduced “use it or lose it” powers that allow municipalities to introduce expiry clauses for such agreements retroactively. After the expiry period, all registered site plans would lapse unless construction had commenced or an extension had been granted, and lapsed site plans would be removed from title through a defined administrative process.

Implementation: Given the high likelihood that individual property owner interests will be affected, a full report to Council, including the presentation of policy options and the opportunity for public input, would be needed before the adoption of any such framework.

The evaluation should be conducted in coordination with the Land Registry Office and should include a defined transition period for currently registered site plans. Any resulting framework would be brought forward as a CPPBL amendment for managing existing stale-dated agreements for Council adoption.

16. Coordinate mapping and policy updates and adjustments with the District.

Description: Work with the District of Muskoka to review and refine mapping that informs the CPPBL and to identify any policy adjustments that may be required. The work would cover constraint, environmental, and floodplain mapping and would proceed in coordination with the District’s Official Plan review cycle.

Rationale: Many of the constraint and environmental triggers in the CPPBL are tied to mapping that originates at the District. As that mapping is refreshed over time, the corresponding policy triggers benefit from a parallel review to confirm that they continue to reflect the concerns they were designed to address. For example, updated floodplain mapping presented in the 2024 Hatch report¹⁰ has resulted in significant changes to allowable land uses across properties in Huntsville.

Coordinating this review with the District will help ensure that the Town and the District remain aligned as new mapping is adopted and that any resulting policy adjustments are made in step with the upper-tier planning framework and provincial standards. A coordinated approach also gives applicants and property owners a clearer picture of how mapping changes translate into CPPBL application, which supports predictability and reduces the volume of disputes that arise when mapping and policy are misaligned.

Implementation: Council should direct staff to work with the District on a coordinated review of mapping that informs the CPPBL, sequenced with the District’s Official Plan review. Any resulting policy adjustments would be brought forward to Council as CPPBL amendments, with corresponding Official Plan amendments coordinated through the District.

Opportunity 4 | Calibrate by-law triggers and exemptions to risk (3/3)

Implementation Outcomes, Cost & Risks

Recommendation	Implementation Priority	Anticipated Impact	Implementation Cost	Risks & Considerations
14. Assess variations thresholds across Class 2 and 3 boundaries.	Tier 4 Long-term Investment	High – Streamline application review, improved clarity and predictability for applicants, and improved alignment with environmental and planning objectives.	High – Significant staff redeployment or consultant fees.	Low – A targeted approach minimizes risks of unintended consequences or poor planning outcomes.
15. Evaluate the risks and opportunities of introducing expiration provisions for undeveloped site plan agreements.	Tier 3 Long-Term Efficiencies	Medium – Improved alignment with environmental and planning objectives.	Low – Requires option review and possible CPPBL amendment.	High – There is potential for opposition from landowners or developers with existing agreements in place.
16. Coordinate mapping and policy updates and adjustments with the District.	Tier 4 Long-term Investment	High – Improved alignment with environmental and planning objectives and improves clarity and predictability for applicants.	Medium – Sustained staff coordination and technical work across the upper and lower-tiers.	Low – A targeted and coordinated approach minimizes risks of unintended consequences or poor planning outcomes.

Opportunity 5 | Establish service standards & accountability structures (1/2)

Recommendations

These recommendations bring greater transparency and accountability to the planning process by setting clear applicant expectations at key stages of permitting and creating a consistent framework for evaluating performance.

17. Establish customer service standards.

18. Expand annual performance reporting.

17. Establish customer service standards.

Description: Develop, update, and publish customer service standards for the permitting process, centred on establishing stronger ownership and accountability for individual customer experiences in addition to legislated standards. Initial standards might include:

- Ensuring that all applications are assigned to a planner or technician within two business days of submission.
- Ensuring that applicant or resident inquiries are responded to within two business days.
- Publishing more realistic processing timelines for pre-consultation and permitting, from submission to permit issuance, while also distinguishing where timelines are legislated.

Rationale: The Town is required to adhere to legislated timelines set out in CPP regulations, but these timelines do not reflect the entire permitting process from the applicant's perspective, often resulting in confusion and frustration. While the Town provides published timeline estimates for permit applications by class, these estimates do not reflect actual timelines and do not include estimates for pre-consultation. Updating estimates to reflect actual service performance can support ongoing trust-building and improve predictability for applicants.

Rationale (cont.): In addition, adoption of service standards for customer service and communication will also improve the user experience. These standards do not require the Town to significantly adjust its review processes but provide a system of accountability and visibility for applicants and residents. For example, responding to inquiries within two business days does not always require a complete resolution to the inquiry, only that a response be provided to assure the individual that the matter is being attended to and establish expectations.

Implementation: Initial standards should be established based on current performance levels to ensure they are realistic and achievable. Developing these standards should require minimal staff effort, though final approval should rest with Council. Any future amendments to the service standards should likewise require Council approval, informed by an understanding of the associated resource implications.

18. Expand annual performance reporting.

Description: Extend annual reporting on CPP permits to include performance data on application processing timelines by class and review phase and customer service standards, in addition to performance against legislated timelines.

Rationale: Annual reporting gives Council a structured basis to assess overall service performance and supports informed decisions on resourcing, priority-setting, and process improvement. While reporting should provide context on which aspects of the permitting process are within the Town's control from a processing-time perspective, the data should be used to support evidence-based decision-making and not as a performance metric for individual staff.

Implementation: Reporting should be integrated into existing annual reporting cycles, drawing on data the Town already captures in CloudPermit. Performance measures should be reviewed annually to ensure ongoing relevance and value.

Opportunity 5 | Establish service standards & accountability structures (2/2)

Implementation Outcomes, Cost & Risks

Recommendation	Implementation Priority	Anticipated Impact	Implementation Cost	Risks & Considerations
17. Establish customer service standards.	Tier 3 Long-Term Efficiencies	High – Improves predictability and service levels for applicants.	Low – Standards should be set to existing capacity.	Medium – Standards will be accompanied by new expectations that could erode public trust if not met.
18. Expand annual performance reporting.	Tier 1 Quick Win	Medium – Improved clarity and predictability for applicants, staff, and Council.	Low – Draws on data available in CloudPermit, and existing reporting cycles.	Low – Data presented with appropriate context should support future service level and resourcing decisions.

Appendix

Preliminary Findings Report Analysis

Analysis of Key Stakeholder Challenges

- The following slides present a detailed, issue-by-issue analysis of the key challenges identified through stakeholder and staff feedback.
- Issues are organized across six themes:
 - Exemptions & Thresholds
 - Development Standards
 - Clarity & Accessibility
 - Delegation & Authority
 - Submission Quality
 - Timelines & Accountability

Stakeholder Challenges | Detailed Analysis (1/8)

Exemptions & Thresholds

The CPPBL exemption framework is intended to allow straightforward development to proceed without a CPP; however, **broad environmental and mapping triggers narrow these exemptions, re-capturing most properties**, including low-sensitivity sites and small projects. Both staff and stakeholders identify this resulted in significant friction early in the CPPBL implementation and resulted in the introduction of “minor works” exemptions for smaller projects at the discretion of the Director of Planning. While this has improved outcomes, it is still operationally opaque and poorly understood by stakeholders.

Issue	Drivers	Stakeholder Impact	Staff Impact	Mitigation Efforts
Overly narrow exemptions list	<p>Regulatory: s.1.3(f) triggers (shoreline, deer habitat, flood zone, Waterfront Precinct) apply uniformly per Provincial policy; exemption thresholds do not distinguish contexts.</p> <p>Operational: The exemption process through pre-consultation is unclear to most applicants; Bill 23 exemptions for under-11-unit residential without shoreline are not binding for CPPS and therefore not operationalized.</p>	<ul style="list-style-type: none"> • Carport additions and small renovations pulled into full CPP process. • Qualifying conditions capture the vast majority of properties regardless of actual risk. 	<ul style="list-style-type: none"> • Many triggers are set by provincial legislation and protect sensitive areas where impacts are irreversible. • No mechanism for staff to waive mapped triggers independently. 	<ul style="list-style-type: none"> • The Town’s introduced a “minor works” exemption pathway through the pre-consultation process to grant permit exemptions at Director's discretion for smaller-scale development, currently applied to decks, docks, garages on already-developed lots in good shoreline condition.
Deer Wintering Habitat Stratum 1 trigger	<p>Regulatory: Trigger is tied to provincial mapping data embedded in OP schedules; CPPBL provides no mechanism for staff to exercise discretion based on on-the-ground conditions.</p> <p>Operational: Constraint mapping in the OP may be outdated and does not differentiate between functional habitat and urbanized sites.</p>	<ul style="list-style-type: none"> • Applied on urban arterial roads surrounded by multi-res. buildings with no functional habitat to protect. • Adds study cost with no environmental benefit. 	<ul style="list-style-type: none"> • Trigger must be applied wherever mapping shows Stratum 1. 	<ul style="list-style-type: none"> • Discretion may be permitted through a map correction or by-law amendment effecting the scope of the trigger.
Wildland fire study requirements	<p>Regulatory: No basis in CPPBL for staff to scope out the requirement or substitute an alternative.</p> <p>Operational: Staff rely on industry and District set standards or guidelines wherever possible including FireSmart principles.</p>	<ul style="list-style-type: none"> • Study is a provincial template with no site-specific value. • Perception that the study adds cost but does not inform the decision. 	<ul style="list-style-type: none"> • Recognition of limited value. • No mechanism to waive requirement. 	<ul style="list-style-type: none"> • Mapping screening applications and requirements are added based on assessed risk. • For most existing lots, staff currently only require an agreement to adhere to FireSmart principles.

Stakeholder Challenges | Detailed Analysis (2/8)

Exemptions & Thresholds (cont.)

Issue	Drivers	Stakeholder Impact	Staff Impact	Mitigation Efforts
Natural Constraint Overlay mapping accuracy	<p>Regulatory: Technical study is the only mechanism to refine an overlay; no lightweight administrative correction pathway exists in the by-law. Where studies have been done, new data is not stored or carried forward for future use.</p> <p>Operational: Constraint boundaries in OP schedules may not reflect current site conditions. Mapping corrections treated as formal amendment exercises rather than administrative updates.</p>	<ul style="list-style-type: none"> • Properties indicated constrained when they are not. • Correction requires owner-funded studies for straightforward fixes. 	<ul style="list-style-type: none"> • Recognition that some constraints are mapped more broadly than conditions justify. 	<ul style="list-style-type: none"> • Provisions added (s1.2.4) through a housekeeping amendment clarifying interactions with other sections of the by-law. • Some discrepancy in overlay mapping is unavoidable due to dynamic conditions.

Development Standards

The CPPBL requires detailed design proposals, and development standards are **intended to ensure that development is appropriately assessed prior to approval, with particular emphasis on environmental protection**. For applicants, these requirements are the single greatest source of cost, delay, and risk for applicants. Stakeholders reported frustration with the lack of clarity on scoping these studies and concern that they were not well calibrated. The Town has since adopted District Terms of Reference (ToR) for most common studies, and staff regularly calibrate these terms based on individual applications. These changes have reduced the number of conflicts between staff and stakeholders on study scope and quality expectations and the need for peer review resulting from inadequate studies provided by applicants.

Issue	Drivers	Stakeholder Impact	Staff Impact	Mitigation Efforts
Study requirements can change after pre-consultation scoping	<p>Regulatory: s.1.16.1 of the by-law does not establish a formal scoping-lock mechanism tied to pre-consultation; no regulatory distinction for initial or supplementary requirements.</p> <p>Operational: Pre-consultation scoping is informal and non-binding, proposals at this stage are rarely finalized.</p>	<ul style="list-style-type: none"> • Studies identified at pre-consultation are added to later; applicants cannot budget or plan accurately. • Non-binding list undermines the purpose of pre-consultation. 	<ul style="list-style-type: none"> • Additional studies can be required as new information emerges. • Binding requirements at pre-consultation could limit ability to request necessary studies later or respond to application revisions. 	<ul style="list-style-type: none"> • If the applicant's development plans significantly change then different studies should be expected. • Scoping is intentionally linked to site considerations to reduce unnecessary study requirements. • Staff training has contributed to less inconsistency and late identification of requirements.

Stakeholder Challenges | Detailed Analysis (3/8)

Development Standards (cont.)				
Issue	Drivers	Stakeholder Impact	Staff Impact	Mitigation Efforts
Technical study requirements can seem disproportionate to the scale of the project	<p>Regulatory: Technical report triggers are embedded throughout the CPPBL with no built-in scaling mechanism. The full study list in Appendix A is broad and not differentiated by application class or risk level.</p> <p>Operational: Internal scoping to match study scope to project scale is done on an ad hoc basis by staff; TORs as prescribed in s.1.16.1.3 of the By-law have been adopted are not readily available on the Town's website.</p>	<ul style="list-style-type: none"> • Same level of study is expected for small addition as for major development. • Studies are applied regardless of scale, context, or complexity. • Peer review and additional studies add expense. 	<ul style="list-style-type: none"> • Study requirements are driven by CPPBL and OP triggers that must be applied. • Peer review is only used when application quality is insufficient or external technical expertise is required for review. 	<ul style="list-style-type: none"> • District ToR have been adopted to provide additional clarity to applicants on relevant standards and expectations. • Applicants are provided standard ToRs and any scoping adjustments during pre-consultation.
Shoreline Activity Area (SAA) calculation lacks guidance for lots with irregular shoreline frontages	<p>Regulatory: s.2.4.4 provisions work as intended on standard lots, but the by-law does not provide clear methodology for calculating shoreline activity areas where shoreline geometry is irregular or narrow. Staff report this produces repeated debate with applicants, and stakeholders describe it as forcing development to stack within the activity area in ways that feel arbitrary rather than connected to environmental outcomes.</p>	<ul style="list-style-type: none"> • Overly prescriptive development standards in shoreline areas add costs and seem unevenly distributed, creating inconsistent expectations. 	<ul style="list-style-type: none"> • SAA provisions intended to limit the footprint of shoreline structures. • Calculation method was a deliberate policy choice to prevent incremental encroachment. 	<ul style="list-style-type: none"> • Develop guidance establishing a standardized methodology for SAA calculation on lots with irregular or narrow shoreline frontages.
Unidentified fish habitat areas trigger assessments	<p>Regulatory: s.2.15.6 requires a Fish Habitat Assessment where habitat status is unconfirmed within 30m of a shoreline; assessment is the only mechanism to resolve the uncertainty.</p> <p>Operational: No pre-screening or mapping update pathway to remove the trigger before an application is submitted as is common practice in Muskoka municipalities.</p>	<ul style="list-style-type: none"> • Assessments are often required even where habitat is unlikely to be present which adds costs. • Default assumption of potential habitat captures a wide range of properties. 	<ul style="list-style-type: none"> • s.2.15.6 does not permit staff to waive requirement where habitat status is unconfirmed; assessment is only method to confirm. • Without confirmed mapping or available expert resource, caution is the only defensible position. 	<ul style="list-style-type: none"> • Staff direct applicants to more detailed information where they are aware of previous studies that might offer shared value, but this relies entirely on the institutional memory of individual staff.

Stakeholder Challenges | Detailed Analysis (4/8)

Clarity & Accessibility

The CPPBL is intended to provide a single, navigable framework for approvals, but its **regulatory structure remains difficult to interpret without professional planning support**. Current self-serve materials do not bridge the gap, and staff capacity for direct applicant support is constrained by competing priorities. The result is incomplete or misaligned submissions that compound delays, with the impact falling disproportionately on smaller applicants without professional representation.

Issue	Drivers	Stakeholder Impact	Staff Impact	Mitigation Efforts
CPP terminology confused with building permit	<p>Regulatory: "Community Planning Permit" terminology is fixed in provincial legislation (O. Reg. 173/16).</p> <p>Operational: No plain-language applicant guide that explains the distinction between planning approval and construction authorization.</p>	<ul style="list-style-type: none"> • CPPs are frequently confused with building permits by small scale applicants. This results in frustration, wasted time, and, in some cases, premature construction activity. 	<ul style="list-style-type: none"> • Terminology issues stem from the provincial framework and branding of the tool. 	<ul style="list-style-type: none"> • No mitigation possible. CPP terminology is locked into the by-law.
By-law difficult to navigate without professional support	<p>Regulatory: Complex regulatory structure with layered precincts, overlays, and cross-references. Multiple sections must be read together to determine what applies. Several terms changed in the CPPBL without obvious rationale.</p> <p>Operational: No plain-language summary materials or self-serve tools for applicants.</p>	<ul style="list-style-type: none"> • By-law assumes a level of planning literacy that many applicants do not have. • In particular, smaller scale applicants and individual property owners often require professional planning services to navigate the process, adding cost burden or even putting development out of reach for them. 	<ul style="list-style-type: none"> • Many CPPBL provisions were retained word-for-word from the previous Zoning By-law. 	<ul style="list-style-type: none"> • No mitigation possible: the CPP framework is inherently less predictable than a traditional zoning by-law because it builds in discretionary flexibility rather than binary, as-of-right standards.
Internal by-law conflicts between referenced documents	<p>Regulatory: Hatch Report referenced in s.4.13.1(b) conflicts with the Regulatory Flood Elevation in Table 4.1 but the CPPBL does contain provisions for policy conflicts.</p> <p>Operational: Use of updated mapping is permitted under the by-law; conflicts are driven by poor communication of new maps, included outdated mapping in policies.</p>	<ul style="list-style-type: none"> • Applicants and consultants cannot clearly determine which standard applies. • Different outcomes depending on which reference is used, undermining confidence in the regulatory framework. 	<ul style="list-style-type: none"> • By-law requires the most up-to-date mapping be used, but many policies that require formal amendments reference old mapping. 	<ul style="list-style-type: none"> • Existing policy conflict provisions are designed to manage such issues.

Stakeholder Challenges | Detailed Analysis (5/8)

Clarity & Accessibility (cont.)

Issue	Drivers	Stakeholder Impact	Staff Impact	Mitigation Efforts
Precinct provisions amended unevenly, creating inconsistent interpretation	<p>Regulatory: The by-law has been amended over 50 times since adoption, but those amendments have refined some precinct provisions more than others. As a result, some precincts have detailed, tested standards while others still reflect the original drafting and lack the same level of specificity.</p> <p>Operational: Staff administering the by-law encounter different levels of detail depending on which precinct a property falls in. A question that has a clear answer in one precinct may require interpretive judgment in another, not because the policy intent is different, but because the text hasn't been updated to the same standard.</p>	<ul style="list-style-type: none"> Comparable proposals in different precincts can receive different levels of scrutiny and predictability depending on how developed the precinct provisions are. Erodes confidence that the system treats similar development consistently across the municipality. 	<ul style="list-style-type: none"> By-law text varies in quality and specificity across precincts, so the same type of application can require significantly more interpretive work depending on location Internal guidance has not been systematically updated alongside the 50+ amendments, compounding the inconsistency 	<ul style="list-style-type: none"> No mitigation possible: this is the typical and expected experience with development control by-laws.

Delegation & Authority

The CPPS was designed to delegate routine decisions to staff, but **applications that could be resolved at the staff level are frequently escalated to Council**, adding procedural steps, time, and cost that disproportionately impact smaller applicants. The drivers are reinforcing: broad Class 2/3 boundary criteria, limited internal guidance for risk assessment in decision-making, and poor alignment among the by-law's provisions, related policies, and Council's strategic direction leave staff without the institutional support needed to exercise delegated authority with confidence.

Issue	Drivers	Stakeholder Impact	Staff Impact	Mitigation Efforts
Too many escalated applications to Class 3.	<p>Regulatory: Class 2/3 boundary criteria are broad; s.1.20 Criteria or Considering Variations do not provide sufficient interpretive clarity on thresholds for staff delegated authority vs. Council authority.</p> <p>Operational: No decision-support tools or precedent tracking. No rejection mechanism for applications that repeatedly come back with little change.</p>	<ul style="list-style-type: none"> Minor matters (e.g., decks, sunroom additions) are brought to Council, adding several requirements. Council agendas burdened by seemingly routine files. 	<ul style="list-style-type: none"> Escalation often occurs out of caution, because an application is expected to be denied, or in response to requests from the applicant or Council. Consequences of an incorrect Class 2 decision are significant. 	<ul style="list-style-type: none"> Mitigation unlikely due to binding escalation requirements.

Stakeholder Challenges | Detailed Analysis (6/8)

Delegation & Authority (cont.)				
Issue	Drivers	Stakeholder Impact	Staff Impact	Mitigation Efforts
Staff not exercising delegated authority for some approvals	<p>Regulatory: s.1.20 criteria are principles-based but lack measurable thresholds; by-law delegates authority without an interpretive framework.</p> <p>Operational: Risk-averse culture; no Explanatory Notes orienting staff toward facilitation (e.g., equivalent to Lake of Bays).</p>	<ul style="list-style-type: none"> Even where s.1.20 criteria are clearly met, decisions are escalated. Outcomes at Council can be unpredictable. Lake of Bays is cited as a jurisdiction where staff operate with greater discretion. 	<ul style="list-style-type: none"> Staff are required to adhere to approved legislative and regulatory frameworks. Escalation for when approval is not recommended offers applicants the opportunity to request additional relief from Council. Council decisions are not always aligned with approved policy and can create unduplicable approval expectations. 	<ul style="list-style-type: none"> Senior planners are being progressively upskilled to take carriage of more complex files but cannot deviate from approved policies.
Amendment process triggered too often	<p>Regulatory: Use permissions in precinct provisions are rigid; unlisted uses require a formal amendment regardless.</p> <p>Operational: No screening to identify uses that could be accommodated as discretionary through future housekeeping amendments.</p>	<ul style="list-style-type: none"> Experienced as uses that should be permitted as-of-right at the discretion of staff require full CPPBL Amendments (CPPAs). Comprehensive rationale reports add significant time and cost to simple proposals. 	<ul style="list-style-type: none"> Unlisted uses require a formal amendment as a matter of law. No mechanism to accommodate an unlisted use without a formal process. 	<ul style="list-style-type: none"> Higher quality planning justification reports can support streamlined review and approvals where appropriate.
Council can withdraw delegation or overrule staff decisions	<p>Regulatory: Delegation provisions do not establish the conditions under which staff authority operates or define how staff decisions are supported at the institutional level.</p> <p>Operational: The by-law grants broad delegation to staff but does not pair it with formal criteria, internal protocols, or institutional signals that reinforce its use.</p>	<ul style="list-style-type: none"> Inconsistency in outcomes; similar applications can result in different decisions by staff and Council Inconsistency undermines confidence in predictability and certainty of the system. 	<ul style="list-style-type: none"> Staff are bound by written policies and must make recommendations in line with those policies. Staff would need clearer direction from Council, along with internal decision-support tool to exercise delegated authority with greater confidence and consistency. 	<ul style="list-style-type: none"> Mitigation only possible through stronger adherence to written policies by Council or revisions to those policies.

Stakeholder Challenges | Detailed Analysis (7/8)

Submission Quality

The CPPS introduces new terminology, permit classes, and **regulatory systems that are difficult for non-professional applicants to navigate without direct staff support**. The Town's current self-serve materials do not bridge this gap, and staff capacity to guide applicants through the process is constrained by competing departmental priorities. When that support is unavailable, the result is often incomplete or misaligned submissions that compound delays downstream. These capacity pressures are structural, not performance-related, and they fall disproportionately on smaller applicants without professional planning support.

Issue	Drivers	Stakeholder Impact	Staff Impact	Mitigation Efforts
Pre-consultation meeting outcomes are unpredictable	<p>Regulatory: By-law doesn't establish a formal binding mechanism for the study list produced at pre-consultation.</p> <p>Operational: Scoping is guided by CPPS and ToR; no standardized completeness checklist shared with applicants upfront; frequent back-and-forth during pre-consultation is common to re-confirm requirements.</p>	<ul style="list-style-type: none"> Pre-consultation is not binding, and additional studies can be introduced making planning and budgeting reliably difficult. Multiple touch-points often required, each adding weeks before application submission. 	<ul style="list-style-type: none"> Must confirm site conditions and consult agencies before finalizing study requirements, which can reveal new requirements. Locking requirements too early risks missing material issues. 	<ul style="list-style-type: none"> No mitigation possible: each meeting is distinct due to specific site conditions and applicant intentions.
Poor quality submissions contribute to delays	<p>Regulatory: Complete application requirements in s.1.16 are broadly defined leading to inconsistent applications; there are no standardized submission templates or checklists calibrated to application class.</p> <p>Operational: Staff need to meet a quality threshold so incomplete or poor quality submissions cycle repeatedly, extending elapsed time before the 45-day clock starts.</p>	<ul style="list-style-type: none"> Unclear what standard of work will satisfy completeness. No templates, model submissions, or published examples. First-time and smaller applicants most affected. 	<ul style="list-style-type: none"> Staff cannot deem an application complete until all materials meet a satisfactory standard, so incomplete or poor-quality packages must go through multiple iterative review cycles, that require extensive staff effort. 	<ul style="list-style-type: none"> Improve communications materials detailing minimum expectations for application materials.
No conditions-tracking framework for conditional approvals	<p>Regulatory: Provisional approval framework in s.1.17 doesn't establish timelines or sequencing guidance for conditions clearance, deferring to staff discretion.</p> <p>Operational: No internal system to track conditions across active files; clearance is managed manually by staff and often require applicant intervention.</p>	<ul style="list-style-type: none"> Conditions clearance lacks transparency. There is limited visibility into outstanding conditions and clearance requirements. Timelines following provisional approval are unclear. 	<ul style="list-style-type: none"> Staff lack tools and SOPs to track and manage conditions across active files. Volume of active provisional approvals makes consistent administration difficult. 	<ul style="list-style-type: none"> Consider future technology solutions to support tracking, no immediate low-cost mitigation approaches available.

Stakeholder Challenges | Detailed Analysis (8/8)

Timelines & Accountability

The CPPBL establishes a 45-day statutory review period to support faster, more predictable approvals, but **required timelines are not representative of the full applicant experience**. Delays accumulate across pre-consultation, submission review, completeness determination, and conditions clearance, and limited published service standards leave applicants with no basis to gauge expected timelines or hold the Town accountable for elapsed time outside the statutory clock.

Issue	Drivers	Stakeholder Impact	Staff Impact	Mitigation Efforts
45-day timeline not always met	<p>Regulatory: Clock starts at application completeness, which is not defined with specificity; no intermediate stage timelines.</p> <p>Operational: Completeness determination is a bottleneck with no internal service standard.</p>	<ul style="list-style-type: none"> Submission to permit issuance timelines exceed 45 days but was a central selling point for CPPS. Primary recourse (OLT appeal) is prohibitively costly for most. 	<ul style="list-style-type: none"> Statutory timelines are recognized and respected. Upstream delays mean the clock starts later than applicants expect. 	<ul style="list-style-type: none"> Delays caused by application quality or applicant misunderstanding are unavoidable.
No published service standards	<p>Regulatory: By-law establishes the 45-day clock but is silent on all other stages of the application review process.</p> <p>Operational: No internal or public-facing standards for pre-consultation, completeness, or conditions clearance timelines.</p>	<ul style="list-style-type: none"> Applicants lack benchmarks to assess whether timelines are reasonable. No clear basis to hold the Town accountable. Process is perceived as open-ended. 	<ul style="list-style-type: none"> File volume and Special Council Meeting scheduling for Class 3 applications make consistent timelines structurally difficult. 	<ul style="list-style-type: none"> Educational information and process flow chart are publicly available.
CPP and building permit run sequentially	<p>Regulatory: No regulatory basis for concurrent permit processing or issuance.</p> <p>Operational: Building department waits for CPP approval before issuing permits.</p>	<ul style="list-style-type: none"> Sequential approach effectively doubles wait times. Reported efficiencies in neighbouring jurisdictions (Lake of Bays). 	<ul style="list-style-type: none"> Concurrent processing introduces liability risk if a building permit is issued and the CPP is later amended. <i>Building Code Act</i> permits concurrent review, but not concurrent issuance. 	<ul style="list-style-type: none"> Permits are processed concurrently. Lake of Bays has moved to a comparable system to mitigate risks.
Provisional approval sequencing	<p>Regulatory: S.1.17 does not delineate which conditions must clear before issuance vs. post-approval.</p> <p>Operational: Default is to gate all conditions before permit issuance, even where risk of proceeding is low.</p>	<ul style="list-style-type: none"> Requiring all conditions satisfied before any approval creates bottlenecks. Where risk is low, this approach adds time without commensurate value. 	<ul style="list-style-type: none"> Certain conditions must be in place prior to approval to manage legal risk. Providing sequencing guidance within the CPPBL would be operationally challenging, so the conservative approach is the default. 	<ul style="list-style-type: none"> Condition terms are determined based on whether they impact the principle of the development.

Analysis of CPP Processing Data

- The following slides present a detailed analysis of the CPPS permitting process, including consideration of 2025 permit tracking data and stakeholder and staff feedback.
- Process analysis is organized by permitting “stage”:
 - Pre-Consultation
 - Application Submission
 - Application Review
 - Decision & Permitting

High Level Overview of CPP Permits and Process

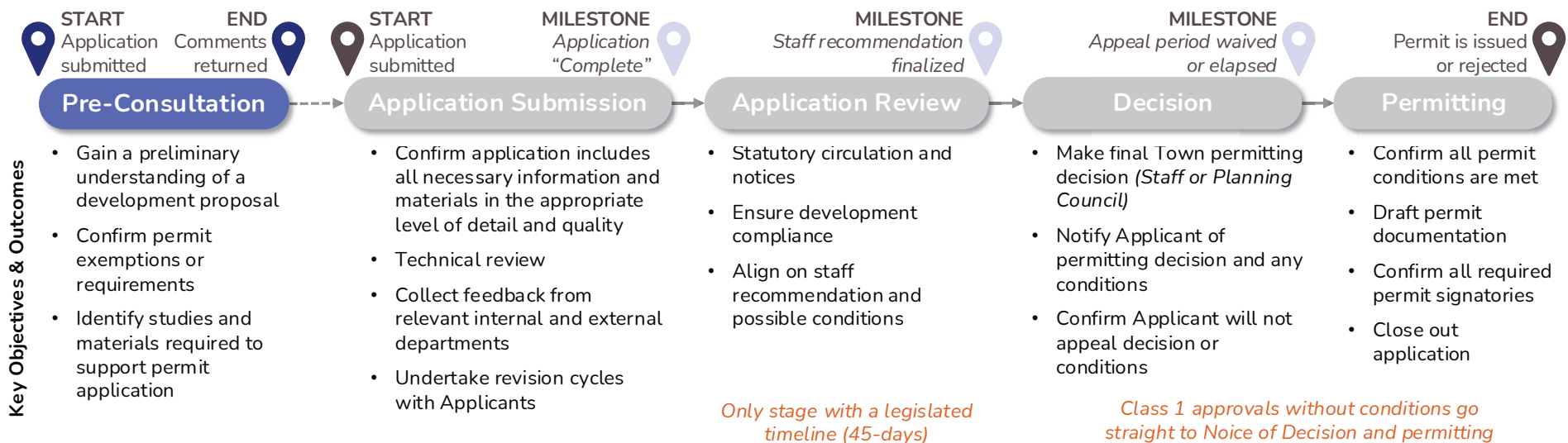
The CPPBL outlines **three classes of CPP** based on the degree of relief required from development standards as well as Community Planning Permit Amendments (CPPA) where a proposed use is not contemplated in the by-law.

- The **CPP fee schedule** is structured to reflect the increasing complexity of these applications and the associated level of resourcing required for review.

CPP Classes

- **Class 1 CPPs** are for developments that are compliant with all the CPPBL development standards.
- **Class 2 CPPs** are for developments that require some minor relief within the thresholds staff have delegated authority to make approvals as defined in the CPPBL.
- **Class 3 CPPs** are for developments that require Planning Council approval because they require major relief from development standards or cannot be supported by staff.

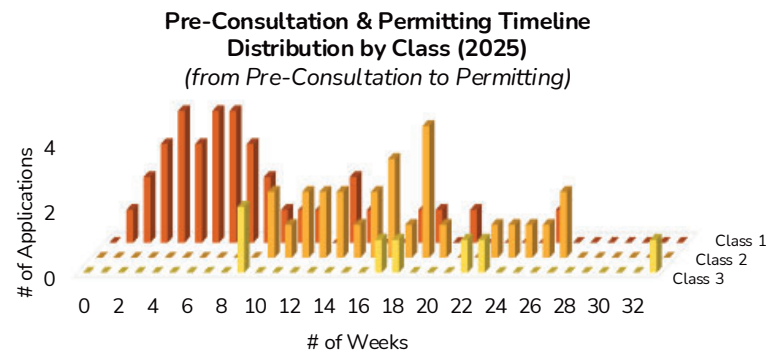
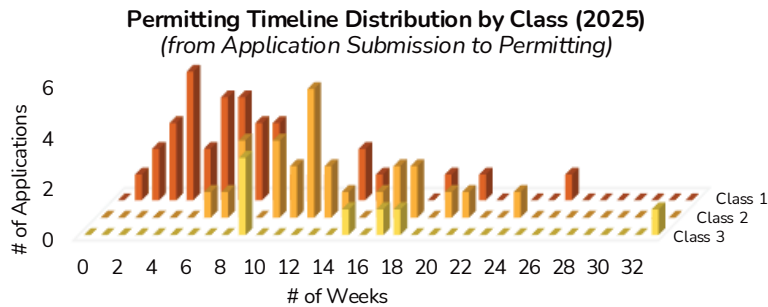
Permitting Stages¹¹



Permitting Timeline Standards & Performance

Permitting decision timelines for CPPS are legislated¹² but apply only to a portion of the overall permitting process. While performance against these standards is important, a full assessment of the Town's performance on permitting timelines requires consideration of the end-to-end process for service users.

This slide presents a comprehensive view of timelines – from pre-consultation or application submission through to permit issuance – and is essential to evaluating and setting standards. The analysis reflects CPPBL requirements and user experience and considers performance against standards where they do exist.¹³



Processing Timeline Standards & Performance¹⁴

		Class 1	Class 2	Class 3
Application to Permit (excl. pre-con)	Town Estimate ¹⁵	4-8 weeks	6-8 weeks	~8 weeks
	Mean/Median	53/43 days (6-8 weeks)	89/82 days (12-13 weeks)	107/105 days (~15 weeks)
	80 th Percentile ¹⁵	~11 weeks	~17 weeks	~18 weeks
Pre-con to Permit (incl. pre-con)	Town Estimate	No estimate provided		
	Mean/Median	55/43 days (6-8 weeks)	118/115 days (16-17 weeks)	129/123 days (17-19 weeks)
	80 th Percentile ¹⁶	~12 weeks	~23 weeks	~23 weeks

- **Class 1 permits generally meet estimated timelines**, with ~2/3 of applications processed within or below the 6-8 week window even when including pre-con. However, performance is not consistent, with the longest applications taking up to 12-26 weeks.
- **Class 2 and 3 permits rarely meet the estimated timelines** provided by the Town, regularly taking twice as long to process, excluding pre-consultation.
- The Town **does not currently provide estimates for pre-consultation** for any type of application, which can cause confusion and frustration when applicants are trying to plan developments.

[12] O. Reg. 173/16 requires municipalities to make a permitting decision within 45 days of receiving all the necessary information and documentation required.
[13] The following analysis is based on the Town's CloudPermit data for 2025.
[14] In some cases, days have been converted to weeks for ease of comparison.

[15] Timeline estimate posted on the Town's website for applicants.

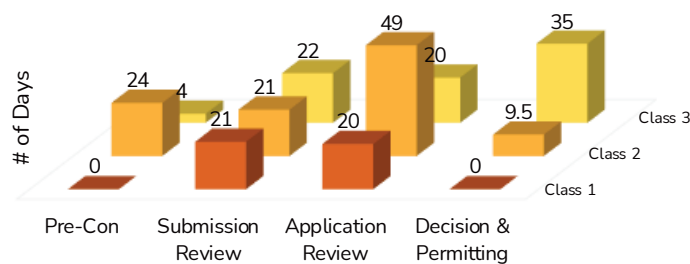
[16] 80% of applications were processed in less than the stated timeframe, while the remaining 20% took longer than the stated window.

Understanding Variation in Processing Timelines

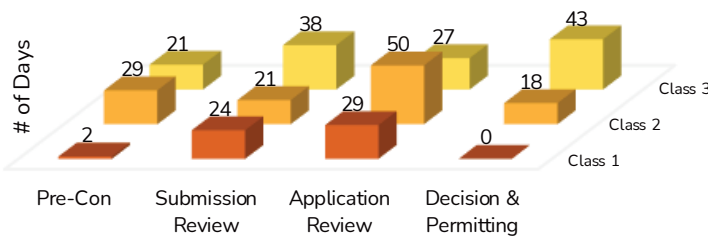
In addition to assessing overall application processing timelines, it is valuable to examine the duration and variability of each permitting stage across application Classes relative to application complexity and processing requirements.

The figures below illustrate how each stage of the application review process contributes to total permitting timelines, segmented by Class. This analysis serves as a diagnostic to identify where the process is operating efficiently and where delays most frequently occur, informing the stage-specific evaluation that follows this slide.

Processing Timelines – Median Days per Application Stage (2025)



Processing Timelines – Mean Days per Application Stage (2025)



Permit Classes | Key Observations

- **Class 1 permits** require minimal processing time for pre-consultation or decision and permitting primarily due to their relative simplicity. The largest variation for these permits occurs during application review.
- **Class 2 permits** have median pre-consultation and application review stages that are approximately 3-4 weeks longer than those for Class 1 or 3 applications. Timeline variation is particularly pronounced at the decision and permitting stage.
- **Class 3 permits** are less common and exhibit high variability, resulting in differentiated median and average processing timelines. However, these applications consistently experience longer decision and permitting stages due to Planning Council involvement.

Note: Class 2 and 3 permits generally have similar overall timelines despite the higher degree of complexity for Class 3 permits and added requirement of Planning Council approval.

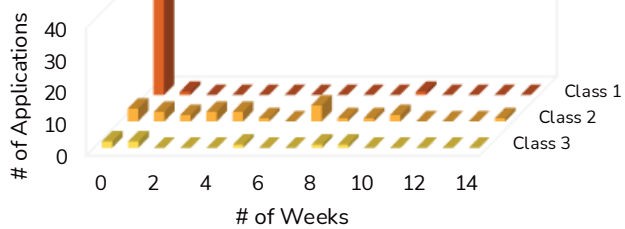
Process Stages | Key Observations

- **Submission review timelines are generally consistent across all application classes**, with a median duration of approximately 3 weeks (Class 3 avg. is skewed by outliers). This consistency reflects uniform processing requirements at this stage.
- **Decision and permitting timelines scale with increasing regulatory requirements**, remaining minimal for Class 1 permits and increasing with permit complexity.
- **The median duration of pre-consultation and application review for Class 2 permits is disproportionately high**, particularly given that these stages have similar median timelines for both Class 1 and Class 3 permits despite significant differences in complexity.

CPP Process | Pre-Consultation



Distribution of Processing Time for Pre-Consultation by Class (2025)
(from Submission to Comments)



Timeline Analysis	Class 1	Class 2	Class 3
Mean/Median days for Stage	2/0 days (~0 weeks)	29/24 days (~4 weeks)	21/4 days (1-3 weeks)
Portion of Avg. Permitting Process	4%	25%	17%

- **The Town does not provide an estimated timeline for pre-consultation.** Straightforward Class 1 permits generally take less than 1 week to process, while more complicated Class 2 and 3 permits can take up to 4 weeks.

Pre-consultation is intended to provide prospective permit applicants with feedback on a proposed development, confirm the type of permit(s) required, and identify any additional application requirements. At this stage, applicants are only required to provide basic property details and a concept drawing.

- **Pre-consultation is mandated** in the CPPBL, s.1.16.1 for all developments and is effectively required for all planning applications through the CloudPermit system, as well as by the Building Department, which requires confirmation of applicable permits or exemptions prior to issuance.
- **Pre-consultation meetings are not always required but are consistently available.** Certain types of development (i.e., commercial, industrial, mixed-use, multi-residential, on District Roads, or within MTO Control Areas) require formal pre-consultation meetings with external agencies, which are scheduled bi-weekly. Otherwise, meetings with staff are arranged on an ad hoc basis upon request.
- **Class 2 applications frequently experience extended pre-consultation timelines.** A potential contributing factor is that, in cases where formal meetings are not required, these applications remain sufficiently complex to necessitate detailed review but may be delayed to ensure other proposals are prioritized to meet set bi-weekly meeting schedules referenced above. Application quality and application responsiveness can also contribute to variability.
- **Limited opportunity exists for design iteration.** While the Town does provide ad hoc support in response to inquiries, applicants seeking structured guidance on how to refine development proposals to minimize application requirements often find the current pre-consultation process is not conducive to these types of discussions.

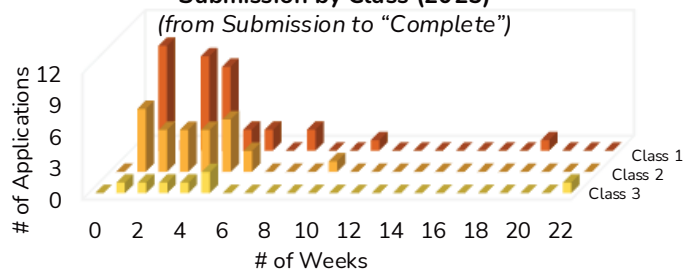
Note: Bill 185 removed municipalities' authority to require pre-consultation for planning applications but not for CPPS.

- **The pre-consultation fee is \$301.00.** When a subsequent application is submitted within three months of pre-consultation, the fee is deducted from the application fee. If a development is deemed exempt (under s.3.1 only), and no site visit is required the fee is refunded.

CPP Process | Application Submission



Distribution of Processing Time for Application Submission by Class (2025)
(from Submission to “Complete”)



Timeline Analysis	Class 1	Class 2	Class 3
Mean/Median days for Stage	24/21 days (3-4 weeks)	21/21 days (~3 weeks)	38/22 days (3-6 weeks)
Portion of Avg. Permitting Process	44%	17%	30%

- **Application submission timelines are relatively consistent across Classes**, with a median duration of three weeks.
- This stage is captured in the permit application timeline estimates provided on the Town’s website but does not count toward the Town’s legislated decision timelines until the application is deemed “complete.”

- **Applications are reviewed and circulated prior to being deemed “complete.”** Legislated timelines for CPPS are triggered once all required information has been received, the Town’s designation of “complete” confirms that all prescribed materials have been submitted at a sufficient level of quality, such that no further information is anticipated.
- **Application requirements are tailored and variable.** While minimum requirements are established under O. Reg. 173/16, additional requirements may be identified by staff through pre-consultation and during the application submission review process, based on individual proposal elements which can be confusing for applicants without a professional background.
- **Peer review is only used to supplement staff expertise as needed.** Staff do not always have the expertise in-house to evaluate the quality of technical studies (e.g., complex engineering, environmental impact, etc.); but these reviews can extend delays.
- **“Pre-circulation” can result in duplicative processes** for applicants, who may complete pre-consultation only to encounter additional requirements once additional detail is provided or during further statutory circulations at the application review stage.

Process Adaptations to Provincial Changes

Iterative review cycles are often inherent to the planning application process, particularly where there is a strong customer service interest in minimizing permit denials, reducing unfavourable approval conditions, and supporting innovative development proposals.

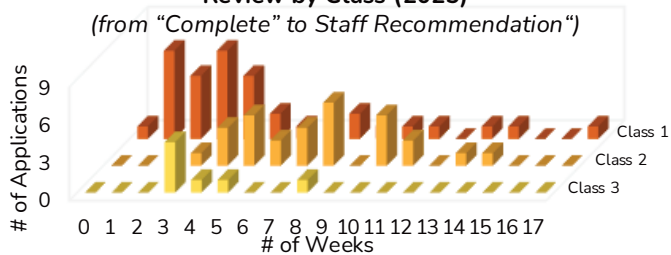
Following the introduction of Bill 108, which mandated fee refunds for permits issued outside prescribed decision timelines, many municipalities shifted iterative review cycles into mandatory pre-consultation processes, introducing more robust requirements and increased scrutiny at that stage.

After refund requirements were repealed and the province eliminated municipalities’ authority to mandate pre-consultation (Bill 185), more robust “application pre-screening” practices emerged. These practices serve to manage appeal risks arising from factors beyond municipal control, while still enabling iterative review cycles to occur.

CPP Process | Application Review



Distribution of Processing Time for Application Review by Class (2025)
(from “Complete” to Staff Recommendation“)



Timeline Analysis	Class 1	Class 2	Class 3
Mean/Median days for Stage	29/20 days (3-4 weeks)	50/49 days (~7weeks)	27/20 days (3-4 weeks)
Portion of Avg. Permitting Process	52%	43%	21%
Apps. reviewed within 45 days	75%	42%	86%

Legislated Timelines: O. Reg. 173/16 gives applicants right of appeal when a permitting decision is not made within 45-days of the Town receiving all documentation.

For tracking and reporting purposes, this stage is considered complete done when staff finalize recommendations, regardless of whether further approval is required.

Once an application has been deemed “complete,” the majority of iterative review, supporting studies, and resulting design modifications should be concluded. The application review stage is intended to focus on fulfilling the statutory review requirements (e.g., circulation to commenting agencies, public notice) and preparing a final decision and/or conditions within legislated timelines.

Statutory Requirements

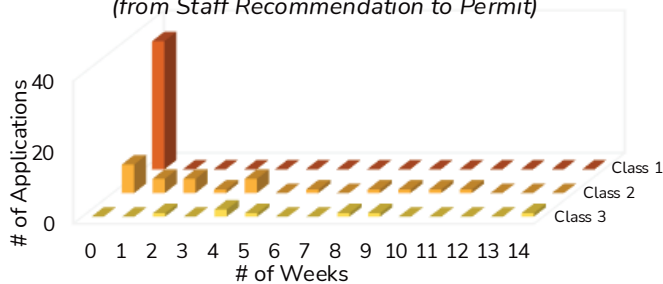
- **Class 1** permits do not require circulation or public notice and involve only the finalization and approval of necessary permit conditions.
- **Class 2** permits have by-law-imposed circulation and public notice requirements and comment periods (14 days).
- **Class 3** permits have by-law-imposed circulation and public notice requirements and comment periods (20 days).
- **Application review exhibits the greatest variation in timelines.** Class 2 permits consistently take nearly twice as long to process as either Class 1 or Class 3 permits, with legislated timelines met in only 42% of all Class 2 permits reviewed in 2025. Application simplicity explains quicker review of Class 1 permits, but not Class 3 permits.
- **Legislated timelines are not as binding as practical timeline constraints.** Higher compliance rates for Class 3 permits appear to be driven by prescriptive Planning Council schedules, which lead to the prioritization over these applications over Class 2 permits, despite fewer administrative and report preparation requirements for Class 2 cases.
- **The identification of new application requirements at this stage represents a significant pain point.** Despite applications being deemed “complete,” additional studies or design revisions are still sometimes requested by staff. This may result from changes to the application, as well as the fact that management-level review often does not occur until this stage.

Note: CPP regulations do not require any public consultation. Huntsville’s requirements were developed based on public consultation and Council direction.

CPP Process | Decision & Permitting



Distribution of Processing Time for Decision & Permitting by Class (2025)
(from Staff Recommendation to Permit)



Timeline Analysis	Class 1	Class 2	Class 3
Mean/Median days for Stage	0/0 days (0 weeks)	18/10 days (1-3 weeks)	43/35 days (5-6 weeks)
Portion of Avg. Permitting Process	0%	15%	33%

Staff Reporting and Data Availability: For tracking and reporting purposes, these stages are combined as they only apply primarily to Class 2 and 3 permits.

The decision stage includes the final approval (or refusal) of staff recommendations by the appropriate delegated authority (the Director or Planning Council), the issuance of a formal Notice of Decision, and confirmation that the applicant will not appeal that decision.

The permitting stage comprises all the clerical and administrative steps required to confirm any conditions have been met by the applicant and issue the final permit. This begins once the appeal period has been waived or has expired. *For straightforward Class 1 applications, approvals proceed directly to the permitting stage following application review, and no formal Notice of Decision is provided.*

The total duration for these combined stages are typically proportional to application complexity and statutory requirements:

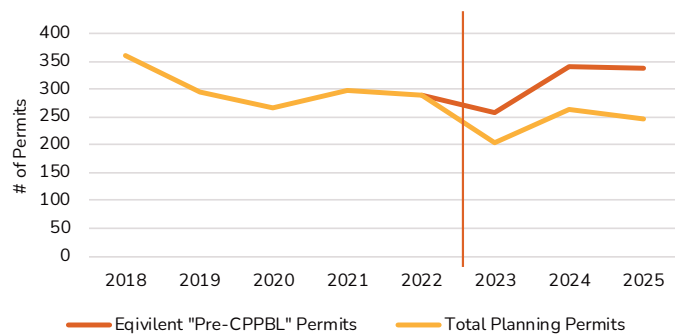
- **Class 1 permits** have negligible decision and permitting timelines, as applications are compliant by definition and require only sign-off and issuance.
- **Class 2 permits** require a formal Notice of Decision, approved by staff, prior to permit issuance.
- **Class 3 permits** require a full staff report and a decision by Planning Council before a formal Notice of Decision can be issued and permits finalized.
- **Timeline variation by class occurs primarily at the “decision” stage**, driven by different delegated authorities and individual application complexity.
- **“The “permitting” stage is relatively consistent across classes.** Any variation here is primarily driven by the need or complexity of conditions and applicant responsiveness to clerical requests.
- **Clerical and administrative requests during the “decision” and “permitting” stages can result in significant delays** (e.g. waiving appeals, applicant signatures). While delays at this stage are typically the result of applicant non-responsiveness, stakeholders report not always being aware that such requirements are the source of delays and they follow up with staff.

Analysis of CPP Permitting Volumes and Data

- This section includes an analysis of year-over-year permit volumes and impacts of the CPPS and other factors.

Assessing Application Volumes

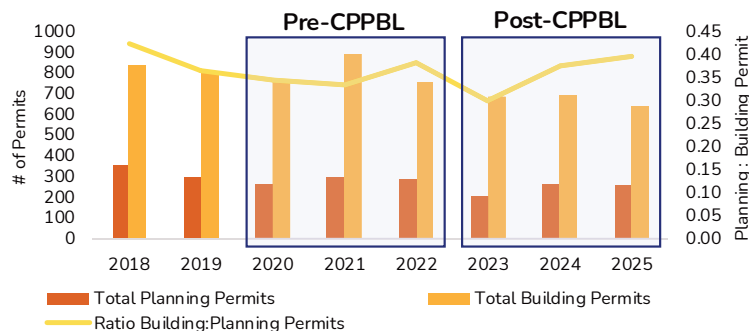
Real and Adjusted Planning Permit Volumes before and after CPP By-Law



While some measures suggest a reduction in planning permit volumes following the introduction of the CPPBL, the overall picture is more nuanced.

- When total permit applications post-CPPBL (2023) are adjusted to reflect pre-CPPBL equivalent applications there is an observable decrease in the total number of permits by approximately 20% annually, largely attributable to “permit consolidation.” However, **this decrease does not account for other potential factors, including broader changes in development activity.**
- The lower graph plots the annual difference between planning and build permit volumes. While building permit volumes can be a lagging indicator for development activity, they can be a useful proxy. When real planning permit volumes are compared to building permit volumes **to account for annual changes in development activity**, the impact of the CPPBL on planning application volumes appears negligible.
- The average number of planning permits issued per building permit in the three years before the CPPBL came into effect (0.35) is the same as the average for the three years after (0.36).

YoY Planning and Building Permitting Volumes



Other possible factors limiting the impacts of the CPPBL on application volume streamlining:

- **New project types captured:** As part of the CPPS, the Town introduced new site alteration and vegetation removal provisions, that did not exist in the previous Zoning By-law. These changes – under either system – bring projects that previously required only building permits into the planning approvals process, potentially increasing overall permit volumes..
- **Limited changes to exemptions:** The CPPS did not practically reduce any development provisions in the Zoning By-law, limiting possible reductions in permit volumes through more defined or streamlined provisions.
- **Multi-application approaches:** Anecdotally, some stakeholders reported occasionally working with staff to “break up” CPPs into multiple applications. This was a voluntary strategy to de-risk certain elements of a development and reduce the amount of upfront finalized design work.

Case Study Analysis

- This section includes a comparative analysis of the Lake-of-Bays CPPS.

Lake of Bays CPP Bylaw Case Study

Lake of Bays is a fellow municipality in the District Municipality with a permanent population of approximately 3,760 and a seasonal population exceeding 11,000. In 2006, Lake of Bays became the first municipality in Ontario to implement a Development Permit System. In 2021, it subsequently adopted a Community Planning Permit By-law (2021-111), which came into force in April 2024. Differences in the by-laws reveal opportunities for future exploration and validation.

Overview of CPP Framework

The CPP By-law applies Township-wide and establishes two permit classes:

- **Class 1** — The application conforms to permitted uses and standards, or requires a minor variation; approved by staff with no notice requirement.
- **Class 2** — The application requires a more substantial variation or involves a non-residential discretionary use; approved by Council after notice to property owners within 120 metres.

Where permits are required:

- Construction or placing of buildings or structures
- Additions or alterations that substantially increase a building's size or usability.
- Site alteration including grading, filling, or blasting.
- Removal of vegetation.

Where permits are not required:

- Development that is a permitted use, fully complies with all by-law standards, and is not located in or adjacent to a natural heritage area, shoreline activity area, watercourse, hazard lands, or steep slopes.
- Repairs and maintenance that do not change the floor area or location of a structure.
- Agricultural uses in the Rural Planning Permit Area, forestry operations, and conservation uses.

Process & Timelines

- **Pre-consultation:** The Township provides written confirmation of required studies and reports at the pre-consultation stage, establishing a more predictable scoping process than an informal or non-binding approach.
- **Compressed timelines:** The two-class structure and no-notice Class 1 process compress timelines for straightforward files.
- **Conditions and sequencing:** The by-law distinguishes between conditions required prior to permit issuance, conditions attached to the issued permit, and conditions registered on title.

Key Differentiators from Huntsville

- **Two-class vs. three-class system:** Lake of Bays streamlines compliant applications and minor variations into a single staff-level class with no notice requirement.
- **Opt-in Council referral:** Lake of Bays staff or applicants may voluntarily refer a Class 1 file to Council without a threshold requiring referral.
- **Interpretive framing:** Lake of Bays' by-law Explanatory Notes articulate the system's intended outcomes, orienting staff toward facilitation and proportionate application.
- **Institutional maturity:** Lake of Bays has operated under this framework since 2006, providing nearly two decades of experience in discretionary decision-making prior to township-wide implementation in 2024.



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