

Lessons from Digitizing Planning and Permitting Services

Introduction

Interest in modernizing development approval and permitting processes is gaining significant momentum across Canada. While there have been some early trailblazers, there has been a recent explosion in Planning and Permitting modernization initiatives. The Covid experience showed just what was possible virtually, then combine that with increasing pressure to build more housing, to be responsive to economic development opportunities, to be more transparent with communities, along with the need to provide timely metrics and reporting – this is all pushing municipalities to more deeply explore the possibilities of what technology can unlock in this space.

Perry Group has been working with various municipalities across Canada on planning and permit modernization projects. We have found a set of commonalities around what works and what doesn't when pursuing a digital Planning and Permitting strategy.

Below, we share some of the important lessons learned from the projects we have been involved in, which may help you as you plan your own digital improvements.

Context

Whether a municipality has identified a need for more housing, is dealing with vocal local builders, is responding to political pressures, or trying to attract new employers, municipalities everywhere are looking to speed up their approval processes.

Of course, this is in the broader context of typical municipal financial constraints, difficulty attracting and retaining good staff, ever-changing legislation, incentive programs, the increasing complexity of development, especially in built-up areas (infill), climate change pressures, competing interests in the communities they are serving, increased community engagement, and applicants' expectations of better customer service.

Automating Planning and Permitting services is one of the small levers municipal leaders have available to respond to these increased pressures.

What do we mean when we use the term automation? We mean providing customers with the ability to apply, pay and manage their applications online; we mean the systems do most of the repeatable administrative tasks while staff are released to focus their attention on higher-value work; we mean providing staff with the tools to process, circulate, receive comments within the system and to gather the data about applications to inform future decision-making; we mean there is integration with GIS, electronic plans review software and the municipal website to simplify process management and be transparent with the community about proposals. We mean agreements and clearances of conditions are logged and tracked in the system.



Why Automate

The reality is that there are huge benefits to be gained from automation.

In Mississauga, for example, the municipality freed over 11,000 hours of staff capacity through process improvement and digitization efforts over five years. It reduced staff time to review site plan applications by 24%. It reduced overall development application processing time by 57%. In that time, they also saw a massive reduction in customer travel and paper consumption while gaining new insights into development activity. Other communities have increased the number of inspections inspectors can complete in a day, sped up appointment booking and plowed through permit backlogs through investment in permit management software.

Consistent systems enabling customers to apply and manage applications online, staff, partners and consultees to manage application processing tasks digitally in real-time, and for information to be shared transparently with the community is the foundation of digital Planning and Permitting. In contrast, relying on paper files dropped at counters, USB sticks, file drives, email, Dropbox, spreadsheets, various disjointed databases and systems and manual website updates leads to a fragmented process, lost information and time, inconsistent processing, and massive duplication of effort, slowing down approvals, frustrating customers and delaying construction.

The advantages of automation that we see municipalities realizing include:

- Being Open for Business 24-7, applications can be made anywhere, anytime. Online applications can be validated before submission, reducing small, silly and time-consuming errors.
- The information supplied by applicants can be cascaded through various applications without staff transcribing the information.



Why Automate cont.

- Simplification of circulation for comments, receipt of comments from reviewers and compilation of feedback.
- Simplification (complete automation) of uploading application information to the website for community review builds transparency in the approval process where the public, applicants, agencies, province and other stakeholders are informed online by default.
- Automated reminders can be sent to applicants and reviewers if work is outstanding, and escalations to supervisors can be made if necessary, ensuring that applications keep moving.
- Transparency for applicants to see status or comments as they come in, reducing the number of unnecessary inquiries to check on status. When comments are ready for viewing, applicants can immediately self-serve and share with others on their project team.
- There is one single source of truth, making knowledge transfer more manageable.
- Information collected from the development process can be shared in real-time with Engineering, Parks Planning, Building, Finance, and Clerks (various permits), resulting in a more integrated, holistic development service.
- Processes can run in parallel rather than in a series.
- Facilitates hybrid working; improves workload planning, distribution and monitoring.
- Makes it easier to quickly and in real-time pull metrics and performance measures, including the number of applications by type and stage, length of time of processing, number of units approved, length of time to get reviewers' comments by reviewer, and with GIS integration, property information and any constraints to development easily identified. Heat maps can be generated to identify development and processing trends.



A Key Idea: The Development Journey

So, how should one approach Planning and Permitting digitization?

We will get to that, but first, there is an important concept, or mindset shift, that we at Perry Group think those leading the development-related functions in municipalities should consider.

In every province, multiple pieces of legislation govern Development Approvals and Permitting processes. Municipalities typically break the Planning and Permitting processes into approvals reflecting the applicable legislation, including, among others, Subdivision Approval, Official Plan and Zoning By-law Amendment Approvals and/or Committee of Adjustment, Site Plan Approval and Building Permits. Within each of these application types, various permits, agreements, and securities are required, and separate applications are required for Right-of-Way permits, grading permits, and encroachment agreements.

In most municipalities we have worked with, these are treated as unique/discrete applications. We see evidence of this in the number of times an applicant must fill out the same information from one process to another, visit different counters or buildings to process different permits, or secure approvals for their project.

Looking at this from the customer's perspective, proponents “just want to build something.” They don't say, “I want to apply for ten different approvals,” and then build something. Customers see the municipality as one entity, not multiple separate entities enforcing various aspects of legislation, so they can't understand why separate applications are required. The approvals they need are seen as hurdles to clear their journey to get their single project done.



A Key Idea: The Development Journey cont.

Of course, in a perfect world, customers want their journey to be inexpensive, frictionless, and quick, with as few stops as possible and complete professional advice and comments from reviewers. On the municipal side, they want to demonstrate to customers the value they bring and how efficient and effective they are.

So, the mindset shift that we think is important is about thinking about these discrete, standalone processes as a clearer continuum, a clearer single journey for customers rather than separate applications for relevant permissions. Permission steps are initiated as the application progresses through the processes, and the municipality's systems seamlessly initiate the relevant groups to review the project at the right time.

To illustrate this concept, Perry Group uses a diagram depicting a train journey.

We imagine an applicant as a traveller jumping on a train to their destination. Of course, there are various stops along the way that the traveller must pass through, but the train follows the tracks and passes these stops, ensuring that the traveller gets to where they need to be.

Like a train travelling along a track, a development project often includes several people (owners, their consultants, the reviewers) joining and leaving the journey at different stages. The team constructing the project may be entirely different from the one that started at the pre-consultation stage.

Just like a train journey, several stops or hurdles (permits and approvals) can cause delays.



A Key Idea: The Development Journey cont.

Although the diagram shows a linear railway from start to finish, many municipalities point out that the process map could look more like the Tokyo subway map! Regardless of the system's inherent complexity, we need to make it easier for customers to navigate.

OK, with this analogy beaten to death and the concept hopefully understood, let's get started

Getting Set: Things to Think About

As you start Planning and Permitting modernization work, you need to set it up for success.

First, you need to figure out who is going to be the champion of the strategy and associated projects. This is not the project manager. This needs to be a senior leader. If your senior people are not interested, don't get it, and won't use the system, what chance do you have of convincing the team to use it? Don't worry if you're not "tech savvy" or "uncomfortable with this stuff" – you must understand what's possible and what it means for your teams.

The champion must lead from the front as an enthusiastic and knowledgeable cheerleader. They should have and be able to articulate a clear vision of the future. The champion will socialize the project inside and outside the organization, ensure budgets are in place for the project, work across departments to obtain buy-in across the organization, and set expectations of staff during the project and rollout.



Getting Set: Things to Think About cont.

Leading from the Front

It is important to understand that this work should be viewed as something other than an IT project. While you must work with your IT colleagues to help you navigate the technological world, Planning and Permitting management and staff are the owners of their services and processes.

Remember also that technology is not a panacea for solving all issues. It is only effective if you have first addressed the organization's culture and your processes are effective and designed for the 21st Century. Technology only changes how you do your work, not what you do.

In advising clients, we always stress the importance of approaching digitization with the framing of people, processes, and then technology. You need to get the processes and people figured out first, and only then can the technology help you deliver great services. Bear this in mind, and don't get distracted by the showy product demo.

Understand the Art of the Possible

To learn and know what is possible, meet with other municipalities that are implementing systems. Find out who the best in your sector are. Look at their systems and see what is being done by them and other leaders. Talk to them and learn from their experience – not just what solution they bought, but how they ran the project, how they governed it, what budget they set, what they spent, what resources they used in practice, what problems they ran into, what lessons they learned, what they would do differently.



Getting Set: Things to Think About cont.

Understand the Art of the Possible

Also, you should know that the Planning, Permitting and Licensing vendor landscape is strong. We know of more than 25+ solutions out there. Many products are specifically designed for small, medium and large municipalities. So, take your time, research, and learn. Have vendors demonstrate their products before you go to procurement so the team knows what is possible.

Importantly, while many vendors can deliver a product that will do Planning and Permitting approvals, no system delivers everything 100% out-of-the-box. You'll need to integrate your approvals system with your GIS, electronic plans review solution, document management system, payment processing and financial systems, and perhaps your website or a portal. Ensure you understand what pieces will be included in the solution and what other elements you must bring.

Also, it is worth noting that some systems offer great flexibility, enabling you to configure and customize the software to your needs; others are more “out-of-the-box” with less flexibility. While fewer options can make it a simpler and faster system to launch, be aware that any changes to the configuration may require going back to the vendor, which can be costly and sometimes slow. On the other hand, if you want full customization of your workflows, you must be aware of the resources you will require to make this possible.

Another important idea that we at Perry Group tend to promote is the importance of focusing on the basics. If you do not have digitized back-office processes and the ability for customers to apply online, do not start with new shiny tools like AI and Chatbots; focus on the basics and get those right first.



Getting Set: Things to Think About cont.

Reuse Where you Can

Like the popular TV show Love It or List It, many municipalities have existing systems they are unhappy with and are in search of a perceived better system. Remember, the grass is not always greener. Sometimes, enhancing what you have (Love It) may be the best, most cost-effective and fastest approach to driving improvements.

What's particularly interesting is that most of the well-established products in the marketplace offer pretty much the same functionality.

Common reasons why staff are not using your existing systems can range from lack of training to out-of-date processes and templates, enhancement backlogs, cumbersome navigation, staff resistance to inputting information, parallel systems, and over-designed folders. Sometimes, certain critical modules were not purchased or were not correctly or fully implemented; perhaps the current system has not been properly configured, or the latest version isn't being used.

Meet with your teams and ask why they are not using the system. Find the underlying cause and determine whether the issues are insurmountable or can be addressed. We've often found that reconfiguring existing systems can move the needle surprisingly quickly and at a significantly lower cost.

Sometimes, however, the legacy system is so loathed that a change is the only thing staff will accept, and in these cases, you will have to make that determination and build the justification for a replacement.



Getting Set: Things to Think About cont.

Consult and Engage with Stakeholders

While you bring along your teams, frequent users of your service (applicants, developers, builders), agencies, and partner approvers should also be consulted during the project and during testing to provide feedback. In most cases, the AEC industry shifted to digital processes—CAD, 3D design, project management systems—years ago, and they may be strong advocates for you to go digital.

Make sure you understand how they work and how they will interact with your service. Find out about their needs, pains, and priorities so that you can weave their needs into your vision for the future and articulate to your organization what the industries you serve expect.

Build a Shared Vision and a Clear Roadmap

A key part of successful change management is getting all people affected involved. It is not enough for the leader to have a vision—we need the whole team to “get it,” understand where they are going, and share the vision.

The vision should be jointly developed and articulate the aim (e.g., by the end of 2025, 95% of all applications will be received online). Defining guiding principles can also help shape the project and guide future project decision-making.

A roadmap should be laid out in support of the vision; this should provide a plan for achieving the vision, identifying the key initiatives, staging how to achieve the vision/goal, and identifying what resources and funding will be needed.



Getting Set: Things to Think About cont.

Build a Shared Vision and a Clear Roadmap

When preparing the roadmap, it's important to identify which services/processes you want to launch first. Often, municipalities start with building permits, as those are the highest-volume and most straightforward application types. Applicants either meet the Building Code or not; they are not asking for exceptions to the Code.

Others start with higher-volume but less complex Planning processes such as Pre-consultation, Committee of Adjustment, or Zoning Compliance. Other factors may be considered when choosing the first process to be automated, such as whether there is a department champion for modernization. In any case, we suggest you avoid complex, long-running processes such as Subdivisions, at least initially.

The important point is that you want to demonstrate success on the first launch to build on the momentum.

Recognize the Paradigm Shift Ahead

It is important to realize that, as you move into an automated process, you are moving into a completely different paradigm around how you and your teams work. You are moving to a situation where work is done in the system and not recorded in the system after work has been done elsewhere. The system is not a tracking system – there are no parallel processes in Excel; the work is happening in the system – the system generates mailouts, the system issues letters, the system produces permits, and inspections are booked in the system.



Getting Set: Things to Think About cont.

Recognize the Paradigm Shift Ahead

The mantra – if it didn't happen in the system, it didn't happen – applies here. If an inspection is not recorded in the system, the inspection wasn't done; if a review isn't recorded in the system, it didn't happen; if a status change was not made, the status has not changed. Similarly, applying online is the application; plans review is done inside the system; conditions are identified in the system.

Another important mindset shift is recognizing that you are moving to operate like a bank or an airline, where you rely on the system.

Rethink Processes

Even with our broader thinking about the train travelling concept and the importance of aligning and integrating processes where possible, we implore clients not to digitize a broken or legacy process.

When was the last time you reviewed your approval processes end-to-end, step-by-step? Do you know if the steps still make sense, or can efficiencies be gained? Is the process set up to be convenient for the customer or staff? Is your service designed to make it easy for the customer or your team?

It can be difficult to work in an environment where legislation changes frequently, but legacy practices unrelated to changing legislation often need to be cleaned up and refined.



Getting Set: Things to Think About cont.

Rethink Processes

Involve everyone who touches a file in the improvements and challenge the status quo. Ask “why do we do that” frequently throughout the review – keep asking, and if you don’t get a satisfactory reason why, remove it from the process. For example, why do we continue to ask applicants for information the municipality already has, (e.g., where the municipality is the originator of the data via application forms – for example legal description, roll #, OP, Zoning designation, lot size, servicing fill – when the municipality already has that information). Can this content be auto filled based on location, and then confirmed by the applicants with the appropriate disclaimers?

Look across your organization as well. Are your supporting processes fit for purpose? Are your Freedom of Information (FOI) policies appropriate to support access to historic permit information? Look at your online payment process. Can the upset limits for online credit card payments be increased?

KISS

As you design your new processes and your solution, resist the urge to over-design the system.

Designing a system to cover every possibility and every exception will result in an overly complicated system, which will both delay the project and inflate the cost of implementation.



Getting Set: Things to Think About cont.

KISS

Almost all applications follow a common set of steps. With some nuances and some repetition, most activities fall under these general categories:

Consultation – Submission – Circulation and Comments – Approval (Clear Conditions)

When building the workflows, think about the repeatable steps for different application types and steps. For example, the pre-consultation stage often mimics the submission and review process, albeit with shorter turnaround times and a less comprehensive review. With any workflow, please allow reviewers to skip a step or move an application forward, allowing the flexibility needed for processing. This is especially true for planning applications where pre-consultation may be waived or public meetings combined with approval report meetings.

For customers, please be sure to look to keep things as simple as possible. For example, do not have them select what type of building permit they are applying for; instead, have them select what they are demolishing or what they intend to build.

No Opting Out

Just to let you know, this is not going to be optional. When the time comes, everyone – meaning everyone inside and outside the organization – will need to use the system, creating a single source of truth, continuity in the journey and transparency for the community.



Getting Set: Things to Think About cont.

No Opting Out

This rule applies equally to all, from the application intake team to the senior approver. The organization's leaders must lead by example and set expectations. The work in the system needs to happen in real-time, not recorded after the fact.

To facilitate system work, ensure staff have the proper equipment for online reviews. When you purchase the software, please review your hardware requirements, including whether you need large monitors and walk-up stations at counters and what types of devices your inspectors will need.

Launch a Complete Digital System

When planning for your launch, make sure that you don't just focus on back-office processes. Include the ability to apply, manage applications, and pay online within the system—this is a key transformation and illustrates the potential for change.

In the early days of automation, vendors needed applicants to be able to apply online. So, many municipalities have back-office systems and are looking for online submission capabilities. But if your municipality is starting fresh, go for the full system. When you launch, everything from correspondence, calls, meeting notes, comments, review markups, approvals, and clearances happens in the system.



Getting Set: Things to Think About cont.

Be Ready for Digital-Only Service

Once a service is launched online, there should be no parallel processes. Plan to go digital-only soon.

Use strategies to help frequent customers and the one-time mom-and-pop teams build a deck. In-person training for frequent use in the beginning is good. Going to their office to get them up and running might even be necessary.

Videos and user guides are all necessary. Be prepared to have customer service people assist new users or one-time users. Have a walk-up computer for customers to use if they don't have their own

Running the Project

Governance

Planning and Permitting processes have tendrils across municipal organizations. So, it is important to actively involve people who will be affected by significant changes and technology implementation.

Bringing these stakeholders into a multidisciplinary Steering Committee or oversight group makes sense to help smooth decision-making.

Typically, Planning, Building, Engineering, Public Works, Water, Fire, and others will be impacted, and they should be around the table to help make decisions and secure the resources and time that you need to make this successful.



Running the Project cont.

Project Team

This is a major project; a dedicated full-time project team may be required. This is not a corner of the desk project to fit around other work.

Your project team will need a clear Project Manager who is responsible for the project, overseeing the budget, communicating with the vendor, and supervising the project team. This person needs to be empowered to make day-to-day decisions on the project while providing regular updates to the Steering Committee.

The Project Manager does not need to be an IT specialist, but the team needs one dedicated IT specialist and a specialist from each of the business units affected who knows and owns the processes. The positions on the team could be used as a career development opportunity for senior planners and plan reviewers, with their positions being backfilled.

Complementing the team should also be someone from Purchasing/Legal to help with any procurement/contract issues and someone from Human Resources with change management experience.

Staff members will have legitimate concerns about how this project will impact their work. Communication and addressing staff concerns will be key. Automation is about something other than reducing headcount; staff roles are likely to change, so it is best to get ahead of this issue. A strong HR partner will help navigate these waters.



Running the Project cont.

Communication and Change Management

Communication around the project is critical. All affected parties, reviewers, and stakeholders need to know why change is coming, what to expect from automation, and what it will mean for them. They also need to have their concerns heard and addressed.

Of course, change can be stressful for people, especially those who feel they are doing an excellent job. Most staff are concerned about job losses from automation, but in practice, we don't see job loss; we see role changes and different types of work undertaken by people. At this stage, there is much more work than capacity, even with automation.

Even if you do not fully understand the impacts, be transparent and let people know that you are figuring those things out.

Temper expectations if the project is being rolled out in phases. Communication needs to happen outside the organization as well. Applicants need to know how their service will change. I would like to let you know that staff will still be available to help with the project and any technical issues that need to be provided.

Celebrate the rollout's successes when you hit milestones, e.g., reduced processing times achieved and any positive feedback received. Also, the dashboards and metrics information should be shared so reviews can see how the data is being used.



Running the Project cont.

Post-Launch: Running the Solution/Service

Launching a system to automate Planning and Permitting is a project with a start and end date. But once it goes live and your service depends on the system, it's important to sustain the product and program, and that requires resources to be successful.

Things to consider post-project launch are:

Establish a QA/QC Process, Reinforcement and Enforcement

You need to build in regular audits and data and process checks by managers to ensure everyone uses the system. Undertake screen checks and run reports to ensure things are in order. Get into the habit of reviewing things live in the system with your teams and reiterate, “If it's not in the system, it didn’t happen.” Use metrics from the system to monitor team and individual performance; share broadly and apply peer pressure.

Establish a QA/QC Process, Reinforcement and Enforcement

Schedule meetings with individuals to discuss performance issues, resolve issues, and visibly address non-use of the system through the disciplinary process. Amazon drivers are required to record their deliveries on their tablets. So, it is a similar requirement for staff to record Planning and Permitting interactions in the system.



Running the Project cont.

Post-Launch: Running the Solution/Service

Ongoing Training

Of course, a large investment in training will be required as part of implementation, but training is a program, not a project. It is never complete, and refresher training needs to be available to everyone. There needs to be trainers within the business units who recognize this responsibility in their job descriptions or development plans.

Refrain from relying on busy staff to train people. Soon, you will have a case of a broken telephone, or poor habits will be passed on. Think about how to tailor the training to the user group. Remember, people have different learning styles and are comfortable with technology.

Ongoing Product Management

Like training, once the system is up and running, a program needs to be in place to plan for enhancements (as legislation or processes change or new capabilities become available) to clear up tickets and to ensure that you are maximizing the use of the system.

A product manager (or point person) should manage the ongoing product roadmap, and super users should be identified within the business units who can configure the system, make quick template changes, and/or add or update reviewers.

If outside assistance is occasionally needed, work with the procurement team to create a roster of approved vendors that you can use to undertake work as needed.



Avoiding the Pitfalls

From working with municipalities, we must be transparent and say that we see a repeated pattern of failure around Planning and Permitting systems. These are the common things that we see and that you must avoid if you are going to be successful:

- Leaders don't use the system – don't understand how it works – and profess, “I am not a techie.” Don't be that person! You will be undermining your success. Instead, jump in – even if you are uncomfortable, learn as you go, be a visible leader, and actively use the system.
- Staff don't use the system in real-time and track activities days or weeks after the fact; instead, they build the discipline, reinforcement, and enforcement processes that check data in the system and ensure accountability is upheld.
- The person doing the work is not the person using the system, e.g., a clerk or coordinator updating the system on the planner's behalf; instead, the system requires the person doing the work (regardless of position in the hierarchy) to use it.
- Shadow processes continue to operate in Outlook / Excel, meaning the system isn't the master or authority data source; instead, adopt the “if it isn't in the system, it didn't happen” mantra and hold colleagues accountable for using and updating the system in real-time.
- The project doesn't automate key parts of the process, e.g., circulations and comments, reports, and mapping; instead, it ensures that key processes are automated.
- The municipality doesn't work on processes and doesn't see the whole picture (the journey), treating each application type as a discrete process managed differently and separately from each other; instead, it should think bigger and look for alignment and integration opportunities.



Avoiding the Pitfalls cont.

- The initial focus is on designing the solution for big application types (e.g., subdivisions), which, in practice, there are few of and which take multiple years to complete; instead, we suggest focusing on higher-volume, short-lived applications (site plans, COA, etc.) to find your footing, learn, and grow.
- Teams often try to over-automate / over-design too soon, making the solution too complex to build, too hard to learn, and too inflexible. Instead, follow the “crawl, work, run” approach—start simple with the basics, launch and get people comfortable, then add other layers of complexity and activity tracking and management later.
- Teams focus too much on designing for all exceptions; instead, they focus on the 80:20 rule.
- Leaders see the implementation of a system as a one-off project; instead, they recognize it’s an ongoing living product that needs constant continuous improvement. It becomes your business.
- Municipalities under-resource the project; instead, be realistic about what it will take to implement and assign your best people to design the future.
- Municipalities under-resource the solution's ongoing operation. Instead, think about the people you need to support and run the product. Avoid single points of failure (e.g., having just one person who knows how the system works is a risk).
- Project teams do not engage and connect to other key players who will be impacted (Development Engineering, Finance, Building, Asset Management, etc.); instead, they involve stakeholders in the Steering Committee.
- Municipalities treat implementing a new system as an IT project; instead, view it as a business transformation/design project that you must own and lead.



Avoiding the Pitfalls cont.

- Assume you know the needs of all stakeholders, especially your customers, without asking them / talking to them; instead, involve them in workshops and working sessions and test your ideas and solutions with them.
- Ignore change management; instead, build a change management and training plan that secures people's commitment to a shared vision and brings the team with you.
- Do not assume that technology replacement will solve people and process issues—it will not. Instead, focus on setting the right people and process foundations to enable technology-enabled change.

Perry Group's Services

We have built a dedicated Planning and Permitting practice with experienced former municipal Planning and Building Directors who have led digital service implementation.

We have coupled those leaders with process and service design experts and planning and permitting systems implementation experts with extensive experience implementing and operating these systems.

Our teams have been working in this space for over two decades and have been involved in launching and operating leading award-winning digital Planning and Permitting services.

Together, these teams have helped numerous municipalities – including Burlington, Cambridge, Guelph, Halton Hills, Region of Waterloo, Region of York, Sudbury, Thunder Bay, Waterloo, and Windsor – rethink and design modern digital-centred Planning and Permitting processes, reorient organizations for

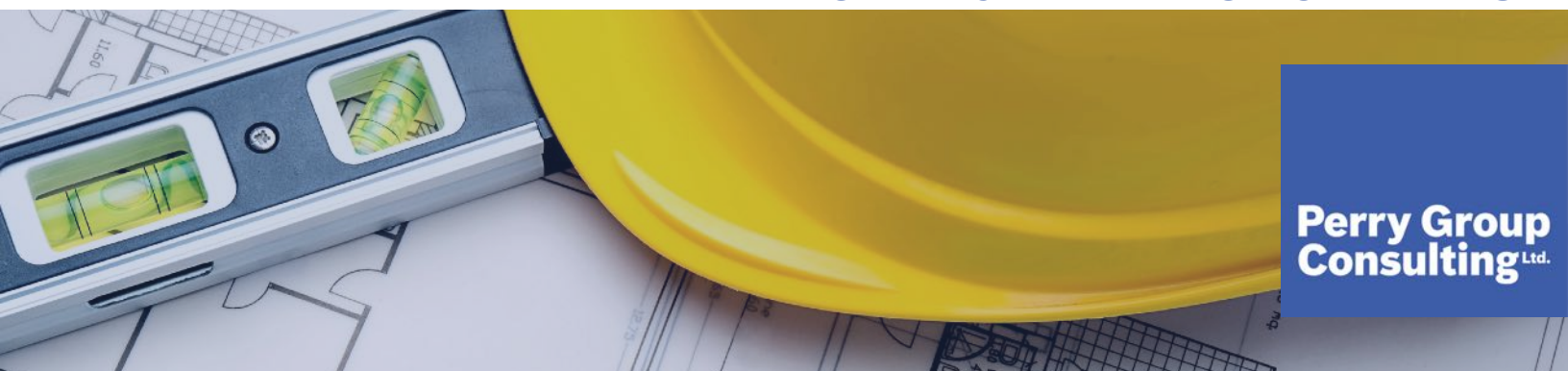


Perry Group's Services cont.

digital delivery built roadmaps and supported the procurement, implementation, and re-implementation of solutions to launch digital planning and permitting.

If you need help in this area, we can help you. Please [get in touch](#)

BUILDING BETTER MUNICIPALITIES



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