

May 3, 2022

Executive Committee  
City of Toronto  
100 Queen St. W., 13th Floor  
Toronto, Ontario M5H 2N2

RE: ConnectTO Update—Supplementary Report: Item EX32.1, 4 May 2022 Executive Committee Meeting

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I am a Land Use Planning consultant who has worked for around a dozen years obtaining telecommunication tower approvals for almost all of the major carriers and third party tower builders in Ontario. I have obtained approval for around 12 towers in Toronto alone over that time, and have a strong understanding of the City's tower approval process and its *Telecommunication Tower and Antenna Protocol* (the "Protocol"). My comments are a personal submission and not on behalf of, or necessarily reflective of, those of any company in the telecommunication industry.

I am in full support of the recommendation to remove the "Prudent Avoidance" policies from the Protocol. These have long been unnecessary given the exclusive regulatory jurisdiction of Health Canada through its Safety Code 6.

This policy has formed the foundation for the Protocol's significantly restrictive Policy 1 B 2 (b), which:

"discourages new towers within or adjacent to Neighbourhoods, Apartment Neighbourhoods, Centres and other sensitive land uses."

While this policy does not "prohibit" new towers in these Official Plan designated areas, in practice Planning staff has applied this as a prohibition and will not consider new towers in such areas. This has resulted in antenna infrastructure being prevented on properties containing (for example) large churches, neighbourhood plazas, and other large non-residential properties within Neighbourhoods. It also prevents antennas on properties within, for example, institutional or industrial areas that are adjacent to Neighbourhoods. The policy is applied this way regardless of the height or level of "stealth" design employed by the facility.

Given the vast areas of low density Neighbourhoods in areas, which do not include tall structures that could serve as an alternative to a new tower, this policy has directly resulted in reduced wireless service quality and reliability in Neighbourhoods. It is my recommendation to Executive Committee that staff be directed to re-evaluate the impact of this policy, how it is being applied, and revise it to reflect the policy goals of increased connectivity and bridging digital divides in Toronto.



## Conclusion

I fully support Recommendation 8 and welcome its adoption by Executive Committee and Council as a first step to improving wireless services in Toronto.

Kindest regards,  
GALBRAITH & ASSOCIATES, INC.

Sean Galbraith, MCIP, RPP  
President/Principal Planner