

From: [Lingard, Norman](#)
To: [Planning and Housing](#)
Subject: [External Sender] Final Downsview Secondary Plan, Urban Design Guidelines and Zoning By-law for Meanwhile Uses
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Attachments: [image001.png](#)

Good afternoon,

Bell Canada thanks you for the opportunity to participate in the City of Toronto's Final Downsview Secondary Plan, Urban Design Guidelines and Zoning By-law for Meanwhile Uses.

About Bell Canada

Bell Canada is Ontario's principal telecommunications infrastructure provider, developing and maintaining an essential public service. The *Bell Canada Act*, a federal statute, requires that Bell supply, manage and operate most of the trunk telecommunications system in Ontario. Bell is therefore also responsible for the infrastructure that supports most 911 emergency services in the Province. The critical nature of Bell's services is declared in the *Bell Canada Act* to be "for the general advantage of Canada" and the *Telecommunications Act* affirms that the services of telecommunications providers are "essential in the maintenance of Canada's identity and sovereignty."

Provincial policy further indicates the economic and social functions of telecommunications systems and emphasizes the importance of delivering cost-effective and efficient services:

- The 2020 Provincial Policy Statement (PPS) requires the development of coordinated, efficient and cost-effective infrastructure, including telecommunications systems (Section 1.6.1).
- Section 1.7.1 I) of the 2020 PPS recognizes that "efficient and coordinated telecommunications infrastructure" is a component of supporting long-term economic prosperity.
- We note that the definition of infrastructure in the 2020 PPS is inclusive of communications / telecommunications, which is indicative of the importance in providing efficient telecommunications services to support current needs and future growth (Section 1.6.1).
- Furthermore, the 2020 PPS states that infrastructure should be "strategically located to support the effective and efficient delivery of emergency management services" (Section 1.6.4), which is relevant to telecommunications since it is an integral component of the 911 emergency service.

To support the intent of the *Bell Canada Act* and *Telecommunications Act* and ensure consistency with Provincial policy, Bell Canada has become increasingly involved in municipal policy and infrastructure initiatives. We strive to ensure that a partnership be established which allows for a solid understanding of the parameters of Bell's infrastructure and provisioning needs and the goals and objectives of the municipality related to utilities. For example, balancing the technical demands of providing reliable service to the public

with the desire to create an aesthetically pleasing environment.

Comments on the Secondary Plan & Urban Design Guidelines

Bell Canada is most interested in changes to the transportation network and/or policies and regulations relating to the direction of population growth and public infrastructure investments, heritage character, urban design, broadband and economic development related objectives and how Bell can further assist Toronto to be a connected community and minimize the impact to our existing equipment. We have reviewed the information available at this time, and are pleased to provide the following comments in order to plan and facilitate the expansion of telecommunications and broadband infrastructure.

To facilitate the provisioning of this infrastructure, we appreciate the City's continued support in ensuring that sufficient notice and time to comment on planning applications are provided, particularly for Draft Plan of Condominium, Draft Plan of Subdivision and Site Plan Control/Approval. This ensures an understanding by applicants of Bell's conditions and provisioning requirements.

Bell would also emphasize that receiving engineering and servicing/utility plans/drawings, as soon as possible in the process, assists in the development and expedition of our provisioning plan. As a result, we would strongly recommend that this consideration be highlighted in any pre-circulation/consultation meetings with prospective applicants. This will assist Bell in providing comments and clearance letters in an efficient manner, assisting the City in meeting approval times. Such drawings should be submitted to: planninganddevelopment@bell.ca by the applicant/their agents.

Moving forward, Bell Canada would like to continue to ensure that the landowners are aware and familiar with our conditions as they pertain to forthcoming Site Plans, Draft Plans of Subdivision and/or Draft Plans of Condominium as follows:

Condition:

"The Owner acknowledges and agrees to convey any easement(s) as deemed necessary by Bell Canada to service this new development. The Owner further agrees and acknowledges to convey such easements at no cost to Bell.

The Owner agrees that should any conflict arise with existing Bell Canada facilities or easements within the subject area, the Owner shall be responsible for the relocation of any such facilities or easements at their own cost."

The Owner is advised to contact Bell Canada at planninganddevelopment@bell.ca during the detailed utility design stage to confirm the provision of communication/telecommunication infrastructure needed to service the development.

It shall be noted that it is the responsibility of the Owner to provide entrance/service duct(s) from Bell Canada's existing network infrastructure to service this development. In the event that no such network infrastructure exists, in accordance with the Bell Canada Act, the Owner may be required to pay for the extension of such network infrastructure.

If the Owner elects not to pay for the above noted connection, Bell Canada may decide not

to provide service to this development.

Additionally, we have reviewed the Urban Design Guidelines, and Bell Canada understands the City's desire to support high quality urban design through built form to enhance the appearance and livability of its urban areas. We strive to minimize the impact of our infrastructure, however with the evolving nature of telecommunication/communication technology it is not always possible for a number of reasons, and appreciate the opportunity to work with the City to find solutions that align as much as possible with the municipality's urban design interests in principle, where feasible.

Future Involvement

We would like to thank you again for the opportunity to comment, and would request that Bell continue to be circulated on any future materials and/or decisions released by the Municipality in relation to this initiative. Please forward all future documents to circulations@wsp.com and should you have any specific questions, please contact the undersigned.

Yours truly,

Norm Lingard
Senior Consultant – Municipal Liaison
Network Provisioning
norman.lingard@bell.ca | ☎ 365.440.7617



Please note that WSP operates Bell Canada's development, infrastructure and policy tracking systems, which includes the intake and processing of municipal circulations. However, all responses to circulations and requests for information will come directly from Bell Canada, and not from WSP. WSP is not responsible for the provision of comments or other responses.

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