



January 5, 2018

Ms. Melanie Pham  
Planner, Community Planning & Design  
City of Hamilton  
71 Main Street West, 6th Floor  
Hamilton, ON, L8P 4Y5

sent via email: [melanie.pham@hamilton.ca](mailto:melanie.pham@hamilton.ca)

**Re: Centennial Neighbourhoods Secondary Plan (September 2017)**

Dear Ms. Pham:

We are pleased to have the opportunity to provide comments on the City of Hamilton's Proposed Centennial Neighbourhoods Secondary Plan (September 2017). The purpose of this letter is to provide our comments on the Proposed Secondary Plan, as well as some background information about Bell Canada's role in providing essential telecommunications services. We understand that the Secondary Plan will be added to Volume 2, Chapter B of the City's Official Plan as a new Secondary Plan through an amendment to the Official Plan. We also understand that this document is being brought forward to a Statutory Public Meeting this month, and we request that our comments be considered as part of this public consultation process.

#### **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 2014 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 k) of the 2014 PPS recognizes that "efficient, coordinated telecommunications infrastructure" is a component of supporting long-term economic prosperity.
- We note that the definition of infrastructure in the 2014 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 2014 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. Bell Canada is supportive of municipal infrastructure initiatives, official plans, zoning by-laws, design guidelines and other initiatives that:

- Recognize the role of modern telecommunications infrastructure in creating economically competitive communities;
- Provide flexibility in the permission of utility structures, which ensures that utilities can be designed, located and maintained in a cost-effective and efficient manner, and ensures that Bell's technicians will have ease of access to maintain the infrastructure;
- Emphasize the need for municipalities, developers and Bell Canada to communicate and coordinate with one another to ensure the coordinated delivery of services; and
- Balance the desire to create attractive, uncluttered streetscapes with the need to provide cost-effective and efficient telecommunications services.

#### **Comments on the Proposed Centennial Neighbourhoods Secondary Plan, September 2017**

We have reviewed the Proposed Centennial Neighbourhoods Secondary Plan and offer the following specific comments. Where applicable, our recommended additions are shown in **bold underline**.

We appreciate From Bell's perspective, the inclusion of the term "where feasible" in policies that address burying infrastructure, which demonstrates that the City acknowledges that it is not always possible or appropriate to place all utility structures underground (e.g., above-ground pedestals and Outside Plant Interfaces). In this manner, the City acknowledges that these facilities must be placed above-ground as they require ready, continuous access for maintenance to ensure reliable telecommunications and 911 emergency services.

#### **6.7.16 Infrastructure, Energy and Sustainability Policies**

We appreciate the City's commitment to the provision of adequate infrastructure, energy efficiency and sustainability principles as outlined in Section 6.7.16. Access to modern communications/telecommunications infrastructure is an important part of creating economically competitive, "intelligent" communities, as employers increasingly rely and thrive on reliable, high-speed internet access. This is consistent with Section 1.7.1 k) of the PPS, which recognizes that efficient, coordinated telecommunications infrastructure is a component of supporting long-term economic growth. Accordingly, we request the following addition to Policy 6.7.16:

Bell Canada  
Development and Municipal Services Control Centre  
Floor 5 BLUE, 100 Borough Drive  
Toronto, Ontario  
M1P 4W2

Telephone 905-540-7254  
Fax 905-895-3872  
meaghan.palynchuk@bell.ca

Municipal services, such as sewers, water, stormwater systems and public/private utilities shall be provided, maintained and upgraded, as may be required, to accommodate the needs of existing and future development in the Centennial Neighbourhoods Secondary Plan area. **The provision of infrastructure will require coordination with utility providers and other agencies as applicable.**

#### **6.7.17 Implementation**

Section 6.7.17.a. states that the City shall undertake a Streetscape and Public Realm Design Study of the Streetscape Improvement areas identified conceptually on Map B.6.7-3-Centennial Neighbourhoods-Transportation and Connections. One of Bell's main objectives is to become involved in planning processes. Doing so allows us to coordinate with the City on the provisioning of appropriate telecommunications infrastructure for new growth and development in a timely fashion. Accordingly, we request the following policy be added as Section 6.7.17.b.viii):

**Design direction for the placement of utilities in the public right-of-way shall be undertaken in consultation with utility providers.**

Bell Canada has developed an Urban Design Manual which speaks to the location and configuration of utility infrastructure to balance ease of access with design. We would ask that the Manual be considered in the preparation of any Urban Design or Streetscape and Public Realm Guidelines which may relate to the Secondary Plan. In particular, we wish to draw your attention to the following, which address matters related to the burial of telecommunications infrastructure and the visual screening of infrastructure from public view:

- Section 5.0 discusses issues with regard to urban design and public utilities. Section 5.1 of the UDM addresses municipal requests to bury public infrastructure. Section 5.2 discusses screening of public utilities. Bell is supportive of discreetly locating its above ground utilities and clustering utilities to minimize visual clutter; however, it is important to design the utilities to allow for safe access by Bell's technicians.
- Section 6.0 provides techniques which can be used to minimize the visual prominence of telecommunications equipment in a number of different community scenarios, while still meeting telecommunications network requirements for resiliency, sustainability and growth.

The Urban Design Manual may be viewed online at:

[https://plaud-ca.wsp.com/BellCanada/bell\\_udm\\_2014.pdf](https://plaud-ca.wsp.com/BellCanada/bell_udm_2014.pdf)

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## **Future Involvement**

We would like to thank you again for the opportunity to comment on the City of Hamilton Centennial Neighbourhoods Secondary Plan. Please advise us of any further meetings, reports, drafts or decisions related to this matter. We request that all documentation be forwarded to:

Ms. Meaghan Palynchuk  
Manager - Municipal Relations  
Access Network Provisioning, Ontario  
20 Hunter Street West, Flr.3  
Hamilton, ON  
L8P 2Z2

If you have any questions, please direct them to the undersigned.

Yours truly,



Meaghan Palynchuk  
Manager, Municipal Relations  
Access Network Provisioning, Ontario

cc: Chris Tyrrell – WSP Canada Group Limited

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Development and Municipal Services Control Centre  
Floor 5 BLUE, 100 Borough Drive  
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