



## Committee of the Whole Report

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**Report Number:** PLAN2025-051  
**Meeting Date:** November 4, 2025  
**Title:** CP2018-014 Telecommunications and Antenna System Siting Policy Update 2025  
**Description:** Proposed changes to clarify roles and responsibilities and streamline the application and concurrence request process  
**Author and Title:** Nicolas Smith, Planner II - Policy

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### Recommendations:

**That** Report PLAN2025-051, **CP2018-014 Telecommunications and Antenna System Siting Policy Update 2025**, be received for information;

**That** the policy entitled Telecommunications and Antenna System Siting Policy, attached as Appendix C to Report PLAN2025-051, be adopted and numbered for inclusion in the City's Policy Manual, replacing all predecessor versions; and

**That** this recommendation be brought forward to Council for consideration at the next Regular Council Meeting.

**Department Head:** \_\_\_\_\_

**Financial/Legal/HR/Other:** \_\_\_\_\_

**Chief Administrative Officer:** \_\_\_\_\_

## Background:

The telecommunications industry is regulated by the federal government through the Radiocommunication Act, which is primarily administered by Innovation, Science and Economic Development (ISED) Canada and Health Canada. As telecommunications systems are regulated by the federal government, they are therefore not subject to provincial requirements or municipal documents such as official plans or zoning by-laws. However, ISED Canada considers the local Land-use Authority (i.e. the municipality) to have the best knowledge of land uses in an area. Therefore, ISED Canada encourages the development of protocols by the local municipalities to ensure that a clear process is established for the consideration of new telecommunications facilities within the community. Where a municipality has adopted a Telecommunications Policy, the Proponent must receive concurrence from the municipality that the proposal complies with the municipal Policy, before ISED Canada will issue an approval for the facility.

As described in the following section, Council has adopted a Telecommunications Policy attached at **Appendix A**. Staff have prepared a series of updates to the Telecommunications Policy in order to clarify roles and responsibilities and streamline the application and concurrence request process. The proposed updates also broaden public notification through enhanced communications.

The following represents the timeframe of the municipality's involvement with Telecommunications applications in the City of Kawartha Lakes:

- **May 22, 2012** – Council adopted Policy C 178 PLAN 001, the first Telecommunications System Protocol;
- **July 15, 2014** – ISED Canada's Client Procedures Circular CPC-2-0-03, Issue 5 came into effect (resulting from a federal consultation review of standards). The document outlined the requirements that apply to anyone (considered a Proponent) who is planning to install or modify an antenna installation of any type anywhere in Canada (typically, an Antenna System);
- **May 22, 2018** – Council adopted Policy CP2018-014, the Telecommunications and Antenna System Siting Policy to replace the 2012 Telecommunications System Protocol, taking into account the updated 2014 ISED Canada standards;
- **June 15, 2021** – Council adopted changes to CP2018-014, one of which was to delegate authority to the Director of Development Services for Uncontested applications;
- **July 28, 2022** – ISED Canada's Client Procedures Circular CPC-2-0-03, Issue 6 came into effect (resulting from a recent federal consultation review of standards). The updates included revising the name of the department to ISED Canada throughout; official languages requirements which came into effect August 1, 2023; revised references to the Canadian Environmental Assessment Act to reflect the coming into force of the Impact Assessment Act; revised

Transport Canada references and details; adopted the text proposed by NAV Canada regarding land-use proposal submission forms; and editorial changes and clarifications;

- **September 27, 2022** – Council adopted changes to CP2018-014 through CR2022-348 to update and revise policy.

## **Rationale:**

### **Telecommunications Policy Update Summary**

Staff typically complete an annual review of existing Council Policies. Staff are proposing to update the Telecommunications and Antenna System Siting Policy to include some practical improvements based on recent working experience with the 2022 updated Policy. **Appendix B** is a track-changes version of the current Council Policy and the changes are summarized below:

1. Wording and policy clarifications, to ensure consistent interpretation;
2. Revised definitions to align with ISED Canada CPC 2-0-03;
3. Revised policies relating to process to provide greater clarity for submission expectations, approval process, and approval timelines;
4. Clarification of expectations for complete applications;
5. Clarification that Director of Development Services determines when an application will proceed to Council for a determination or proceed as an 'uncontested' application;
6. Streamline the Policy by removing terms Contentious and Non-contentious applications, but keeping Contested and Uncontested applications;
7. Structure of the Policy revised to follow logical order of process steps;
8. Policies clarified to not allow Telecommunication Facilities in natural heritage areas, improve provisions to reduce impact on adjacent natural heritage features;
9. Policies clarified to maximize distance between freestanding antenna systems and listed and designated heritage buildings and sites, and require structure-mounted antenna systems to blend in with the structure with respect to form, materials, and colour;
10. The Policy includes a Public consultation process following ISED Canada CPC 2-0-03, to provide reference and clarity that Proponents shall follow;
11. The Public Consultation Process has additional requirements beyond the ISED Canada CPC 2-0-03 minimum, including requirements to post a public notice on the Kawartha Lakes News and Notices website as well as a Public Notice Sign on

the property. These are in addition to ISED Canada requirements for a public notification package to the surrounding local public and circulation in the local newspaper. The requirements for each of these public notices are identified in the Policy and follow ISED Canada CPC 2-0-03 requirements;

12. Public consultation process revised so comments are channeled through City staff to review and direct Proponents to address. City staff shall also be copied on all responses by the Proponent to be informed on the public consultation process;
13. The Policy clarifies what is considered as a reasonable and relevant concern per ISED Canada CPC 2-0-03;
14. In the Public Consultation Summary Report, Proponents are required to provide all communications received, responses provided, and in the case of comments not addressed, to clearly indicate why the comment was not considered reasonable or relevant;
15. The Concurrence Application now requires Proponents to provide confirmation that the Telecommunications Facilities have completed construction through submitting photos of the installation and as-built drawings with location noted;
16. The Policy is clarified that the Request for Re-concurrence must be submitted before construction begins;
17. The Policy includes a request that notification be received by the City for exempt telecommunication facilities to ensure the City is more knowledgeable of telecom work and aid in facilitating more co-location opportunities in the future as the preferred means of increasing coverage and capacity;
18. The Policy provides direction for rescinding a concurrence, in the event the City determines that the proposed Telecommunications Facility contains a misrepresentation, a failure to disclose all pertinent information regarding the proposal, or the plans and Development Agreement have not been complied with, and a resolution cannot be reached to resolve the matter; and
19. The Policy includes that the City can request from Telecommunication Carriers information on a specific Telecommunications Facility whether it is required to support the telecommunications network. The Telecommunications Carriers will provide information on the future status or planned decommissioning for the Telecommunications Facility. When the Telecommunications Carrier concurs that a Telecommunications Facility is redundant, the Telecommunications Carrier and City will mutually agree on a timeframe for removing the Telecommunications Facility and all associated structures and equipment from the applicable site. Once a Telecommunications Facility is deemed redundant, removal will occur no later than two (2) years following this issuance.

Overall, these changes will lead to an improved process, processing times and clarify expectations for processing new applications by providing greater clarity on the process.

## **More Demand and Need to Streamline Process**

The City of Kawartha Lakes has seen an increase in the demand for access to internet to better support today's lifestyles. All three levels of government (Municipal, Provincial and Federal) have recognized the need for rural communities to have reliable mobile phone and internet access, a need exacerbated by recent events. The Eastern Ontario Regional Network (EORN) has been leading the significant public-private partnership to improve cell service across the region, through the EORN Cell Gap Project (the Project). The overall goal of this Project is to expand cell data coverage and capacity which will help to improve safety through increasing signal coverage, provide more choice of internet sources, and provide access to this modern necessity. This Project will provide 99 percent of the area with voice calling services, 95 percent of the area with standard-definition level services (video-app calls, basic app usage, and streaming of standard-definition video), and at least 85 percent with service levels that can support high-definition video and apps. Both the Federal and Provincial governments have contributed to the Project, with some investment from the members of the Eastern Ontario Wardens' Caucus (EOWC). Rogers Communications was selected through a competitive bidding process as the successful partner to contribute the balance of the funds.

The City has also seen an increase in inquiries and requests for proposed telecommunication facilities from various Proponents including Bell, Rogers, Xplornet, and other third-party providers. The Proponents seek to increase coverage and capacity of telecommunication facilities in Kawartha Lakes to address the current deficiencies. This increase in applications has allowed for the current policy update from 2022 to be implemented and give insight on potential revisions to further streamline and improve the process.

Since the City has had a Telecommunication Policy, revisions have occurred to refine the procedure. Prior to June 15, 2021, all applications requesting concurrence had to proceed to Council for support and to receive a Council Resolution. This necessitated a staff report prepared for each request, when in most cases the requests for concurrence were supported by Staff as there were no outstanding issues from the public, an agency, or City staff (an Uncontested application). The major change to the Council Policy in June 2021 granted the concurrence authority to the Director of Development Services on behalf of Council for Uncontested applications. This was done to reduce the amount of staff processing time.

The proposed changes as outlined above also include further refinements to the Telecommunications Preconsultation process and subsequent Telecommunications concurrence requests to improve and streamline the application process. It is anticipated these updates will reduce staff time and effort in reviewing proposals, clarify the Policy process, and formalize staff procedures in the Policy. The proposed revisions as summarized at **Appendix D** were also discussed with the Senior Management Team.

### **Applicable Provincial Policies:**

While telecommunication systems are a federally-led initiative, the Province also recognizes the importance of telecommunications infrastructure and encourages further systems development to meet current and projected service demands in its policy documents, including the Provincial Planning Statement (2024) (PPS). The proposed updates to Policy CP2018-014, as amended, continue to fulfill the objectives of the PPS.

### **Other Alternatives Considered:**

No other alternatives considered.

### **Alignment to Strategic Priorities**

The City of Kawartha Lakes 2024-2027 Strategic Plan includes the following four (4) strategic priorities:

1. Healthy Environment
2. An Exceptional Quality of Life
3. A Vibrant and Growing Economy
4. Good Government

The proposal aligns with both the 'Vibrant and Growing Economy' and 'Exceptional Quality of Life' priorities by facilitating better access to phone and internet services in the City and especially in the rural areas; and, by increasing the efficiency and effectiveness of service delivery through continued streamlining of the telecommunication facility process in Kawartha Lakes.

### **Financial/Operation Impacts:**

There are no direct financial considerations for the City, however there will be some new time and cost savings by reallocation of staff time and efforts to other matters.

## **Servicing Implications:**

There are no servicing considerations for the City.

## **Consultations:**

Senior Management Team

## **Conclusion:**

The proposed Policy updates continue to follow the ISED Canada standards, while streamlining and clarifying the processing of applications. Staff respectfully recommend that Council approve the proposed changes to the Policy.

## **Attachments:**

Appendix A – Council Policy CP2018-014, as amended, dated September 27, 2022



CP2018-014 Sept 27,  
2022 Version

Appendix B – Proposed Changes to CP2018-014, as amended – Track Changes Version



CP2018-014 Track  
Changes Version

Appendix C – Proposed CP2018-014, as amended – October 2025



Proposed  
CP2018-014 Novemt

Appendix D – Summary of proposed changes for SMT Discussion



Telecom Policy  
Update SMT Summa

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**Department File:** D00-99