

Justification Report

For Proposed Telecommunication Antenna Structure

File No. STC0059

**19442 2nd Concession Road,
Holland Landing, Ontario**

October 10, 2024

Prepared for:



Town of East Gwillimbury
19000 Leslie Street
Sharon, ON L0G 1V0

Prepared by:



Shared Tower Inc.
1300 Cornwall Rd., Unit 101
Oakville, ON L6J 7W5



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Town of East Gwillimbury
19000 Leslie Street
Sharon, ON L0G 1V0

VIA EMAIL: planning@eastgwillimbury.ca

Re: Proposed Telecommunication Antenna Structure at 19442 2nd Concession Road

Shared Tower Inc. (Shared Tower) is pleased to submit this Telecommunication Tower application for a Letter of Concurrence to the Town of East Gwillimbury.

The proposed tower is a 45 metre tri-pole tower structure designed to support multiple co-location opportunities. The tower is proposed to be located at 19442 2nd Concession Road, on a Rural zoned property, currently the York Region Paramedic Services - Station 13.

Although the Federal Government, through Innovation, Science and Economic Development (ISED) Canada is responsible for the final regulatory decision to approve the location of the tower, Shared Tower looks forward to working with the Town of East Gwillimbury to ensure that its community objectives are met.

Please do not hesitate to contact me directly if you have any questions or if we can provide any further information.

Sincerely,

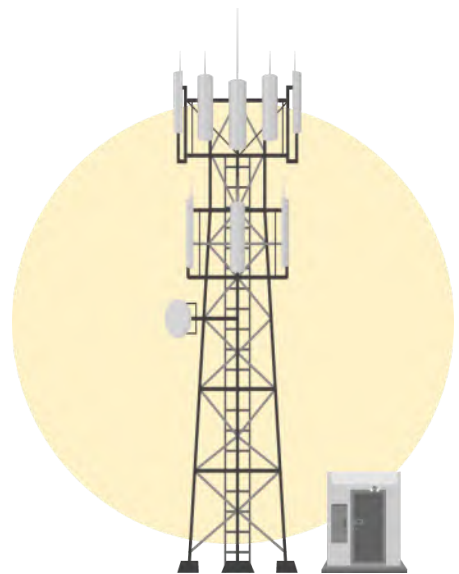
Cheyenne Zierler
Senior Planning Manager
Shared Tower Inc.
czierler@sharedtower.ca

1. Introduction

The telecommunications industry plays an essential role, connecting Canadians with wireless and wireline services from coast to coast. These services facilitate the growth of local economies by providing easy access to information and connectivity for residents, businesses, visitors and public bodies. As demand for telecommunications services continues to grow, more network infrastructure is required to keep pace with this demand.

Shared Tower is proposing a new tower at 19442 2nd Concession Road, Holland Landing (Subject Site). The subject property is a Rural zoned site, approximately 7,776.99 square meters in area or approximately 1.92 acres. The intent of the proposed tower is to strengthen the telecommunications network in order to better support increased demands for consumer connectivity, the digital economy, and health and safety measures in the community.

Shared Tower has also discussed with staff the installation of a Municipal Water Meter Antenna on the proposed tower which will aid in the Municipality servicing the community.



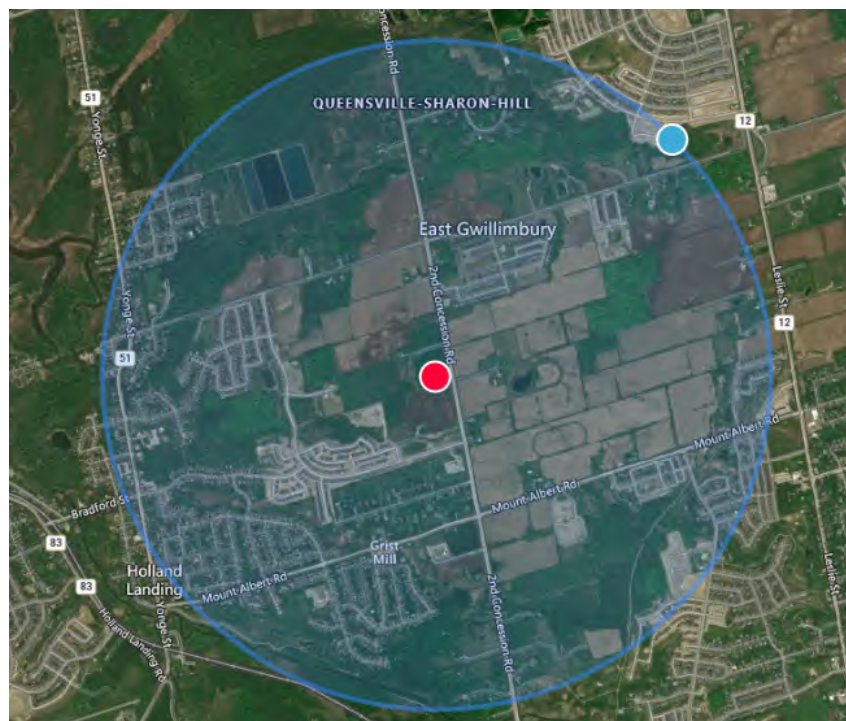
2. Coverage Objective

Broadly, Shared Tower has identified a need for improved telecommunications network coverage in the surrounding area. The proposed tower is a 45 metre tri-pole tower installation, engineered to accommodate initial and future loading for multiple cellular service providers and additional fixed wireless equipment as required, thereby limiting the need for additional infrastructure to service the area.

The location of the tower will ensure separation from the residential properties along with coverage and network capacity for all major wireless network providers. There are currently no suitable telecommunication structures in close proximity that would sustain sufficient connectivity for the area. At 45 metres in height, the proposed tower is anticipated to address coverage issues in the area.

As of the date of this application, national wireless carriers have expressed interest in locating on the tower.

Figure 1: Anticipated Telecommunications Network Coverage



3. Subject Site and Land Use Considerations

The Subject Site, in Figure 2, is located at 19442 2nd Concession Road, Holland Landing (legal description: PT LT 109 CON 1 E YONGE ST EAST GWILLIMBURY PT 1 65R617 ; EXCEPT PT 1, YR1933543; TOWN OF EAST GWILLIMBURY).

The proposed location comprises approximately 1.92 acres of land zoned for Rural Zone uses allowing for a considerable setback from the majority of residents.

Figure 2: Key Map Showing Subject Site & Viewpoint

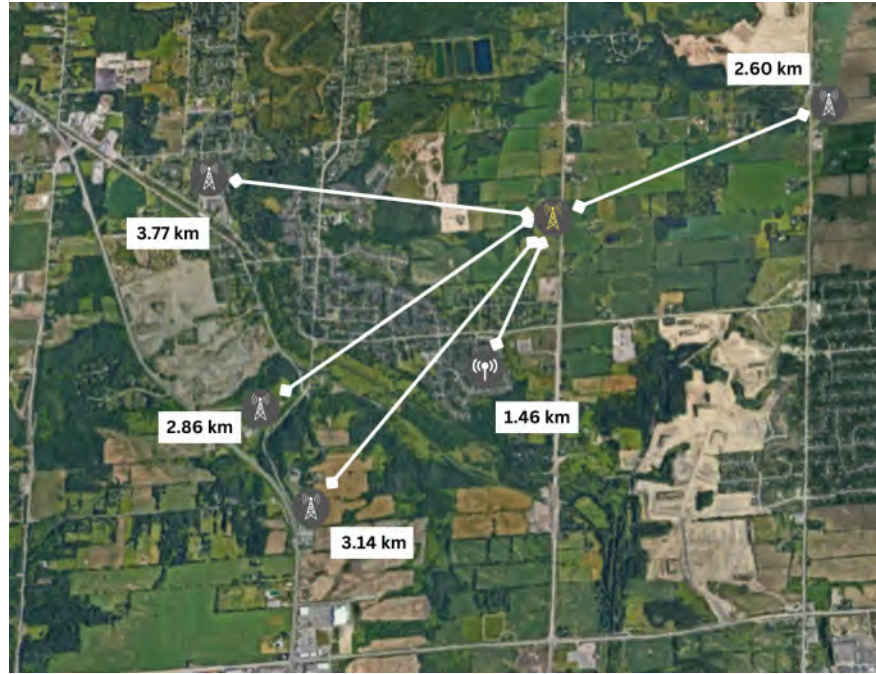


4. Subject Site Selection Justification

Existing Telecommunications Towers

Prior to proposing a new tower, Shared Tower reviewed the location of existing telecommunications towers for co-location opportunities. As shown in Figure 3, the closest existing towers to the proposed tower are the towers located approximately 2.6 km to the Northeast, a tower located approximately 3.77 km to the West, towers located approximately 2.86 km and 3.14 km to the Southwest, and transmitters on the water tower located approximately 1.86km to the south. These distances depict a substantial coverage gap and capacity issues due to increased network reliance and growth.

Figure 3: Subject Site Relative to Nearby Telecommunications Towers



Other Co-location Opportunities

A review for other suitable existing structures, such as rooftops, utility poles, and transmission towers for co-location opportunities was also undertaken. There were no rooftops or utility poles of sufficient height within the search radius to adequately provide additional network coverage.

Distance from Residential and Comprehensive Development Sites

The nearest residential use zoned property to the Subject Site is located approximately 358 metres to the East at 19441 2nd Concession Rd.

Land Use & Public Realm Considerations

The Subject Site is located in a setting away from the majority of residential development and currently used for Rural zoning purposes. Additionally, the Subject Site is not a location of topographic prominence that would affect public views, nor is it located in the line of sight of any views or vistas of significant natural or human-made features.

The proposal is not anticipated to negatively affect any sensitive land uses, such as heritage sites, parks, areas of significant vegetation, shorelines, or water bodies. Overall, the addition of the proposed tower would result in little to no impact on the area's current land uses nor would it detract from the overall public realm.

5. Proposed Telecommunication Antenna Structure

Shared Tower is proposing to construct a 45 metre tri-pole tower on the Subject Site.

Preferred Tower Type

The tri-pole tower design has been selected as the most efficient tower type to support equipment for multiple future co-location services and the elevation required to meet the aforementioned application objective. This tower type is consistent with the typical structures installed in rural-urban areas and ensures minimal visual impact.

Preferred Tower Height

The proposed tri-pole tower has been designed at a height of 45 metres. This height is required to provide optimal coverage to the area for voice and data use. More importantly, this height will also allow other carriers to co-locate on the proposed tower in the future, which will limit the overall number of tower structures required in the surrounding areas. A monopole tower is not possible for the height that is required for this structure.

Control of Public Access & Design Considerations

The proposed tower will include a locked and electronically monitored mechanical equipment shelter. Chain link fencing will be installed around the base of the tower and the equipment shelter will include one locked gated access point. Trees or other vegetation will not be required to be removed or disturbed during the installation or operation of the proposed tower.

Parking

No parking spaces will be removed and will remain available for public use as well as for the telecommunication tower technicians after construction is complete.

Municipal Preferences

This telecommunication tower proposal complies with **Section 5** of the Town's **Telecommunication Tower Protocol** and preferred locations which include:

- Areas that maximize the distance from Residential Areas.
- Industrial and commercial areas.
- Areas that respect public views and vistas of important natural or manmade features.
- Agricultural areas.
- Transportation and utility corridors.
- As near as possible to similarly-scaled structures.
- Located in a manner that does not adversely impact view corridors.

The proposed tower will be located behind the main building which will aid in screening the base of the tower from the road.

6. Federal Policy

The Federal Government, through Innovation, Science and Economic Development Canada (ISED) is responsible for the final regulatory decision to approve the location of the tower. ISED has adopted a policy (CPC-2-0-03 – Radiocommunication and Broadcasting Antenna Systems) which applies to anyone who is planning to install or modify a tower. This policy has been reviewed to ensure Shared Tower's proposed tower is in compliance. A review of the required public consultation process along with several required declarations follow.

CPC-2-0-03 – Radiocommunication and Broadcasting Antenna Systems (2014)

Public Consultation

The Town of East Gwillimbury has an established process under which this proposed tower application will proceed. The Town of East Gwillimbury's public consultation process was reviewed to ensure the minimum requirements will be met by Shared Tower.

Health Canada's Safety Code 6 Compliance

Shared Tower attests that the proposed tower described in this Letter of Rationale will at all times comply with Health Canada's Safety Code 6 limits, as may be amended from time to time, for the protection of the general public, including any combined effects of carrier co-locations and nearby installations. Safety Code 6 takes into account the total exposure from all sources of radiofrequency electric and magnetic fields in the range of 3kHz to 300 GHz. This includes those that may be used in 5G technology.

Canadian Environmental Assessment Act (2012)

Shared Tower attests that the proposed tower described in this Letter of Rationale is excluded from environmental assessment under the Canadian Environmental Assessment Act.

Aeronautical Safety

Shared Tower attests that the proposed tower described in this Letter of Rationale will comply with Transport Canada/NAV Canada aeronautical safety requirements. Transport Canada has determined that no lighting/painting is required on the tower.

Engineering Practices

Shared Tower Inc. attests that the radio antenna system as proposed for this site will be constructed in compliance with the applicable Canadian Standard Association (CSA) standards for telecommunications tower sites and comply with good engineering practices including structural adequacy.

Innovation, Science and Economic Development Canada's Spectrum Management

Please be advised that the approval of this site and its design is under the exclusive jurisdiction of the Government of Canada through Innovation, Science and Economic Development Canada (formerly Industry Canada). For more information on ISED's public consultation guidelines, including CPC-2-0-03, please visit this [website](#), or contact the local ISED office at:

Toronto District Office

151 Yonge Street, 4th floor
Toronto ON M5C 2W7
Telephone: 1-855-465-6307
Fax: 416-954-3553

Email: ic.spectrumtoronto-spectretoronto.ic@canada.ca

General information relating to antenna systems is available on ISED's Spectrum Management and Telecommunication [website](#).

7. Conclusion

Shared Tower has proposed a new tower in the area to strengthen the local telecommunications network. Prior to submitting this request, a thorough search for existing co-location opportunities was conducted, however, no feasible options were available.

Shared Tower believes this proposal:

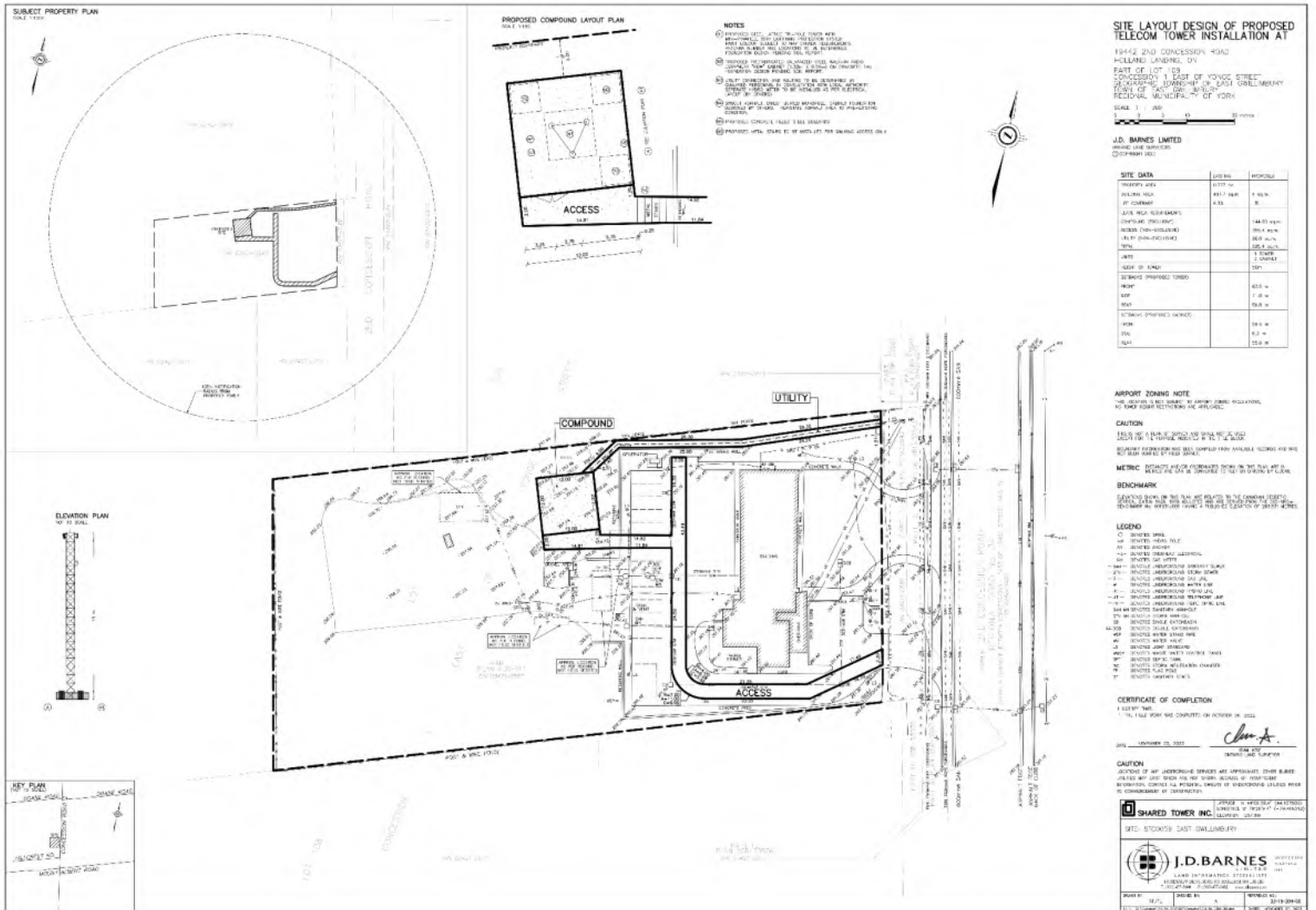
- Works toward bridging the urban-rural connectivity divide by filling an identified network need in municipality and surrounding area;
- Provides co-location opportunities that will reduce the overall number of towers required in the community;
- Is designed to be as visually unobtrusive as possible and blend in on the Subject Site;
- Has no impact on the adjacent land uses or public realm;
- Is aligned with and supports several layers of municipal and federal policy; and,
- Justifies the issuance of a Statement of Concurrence by the Town of East Gwillimbury.

Although ISED is responsible for the final regulatory decision to approve the proposed tower, Shared Tower is committed to effective and meaningful municipal and community consultation. We look forward to working with the Town of East Gwillimbury to continue to build an efficient telecommunications network for the community while ensuring its objectives are met.



Shared Tower

Appendix A: Site Plan





Shared Tower

Appendix B: Site Renderings





Shared Tower

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