



Shared Tower

# Justification Report

For Proposed Telecommunication Antenna Structure

**File No. STC0249**

**Coordinates: 44.093111, -81.414781**

**No Municipal Address**

**January 9th, 2023**

**Prepared for:**

Township of Huron-Kinloss  
21 Queen Street, P.O. Box 130  
Ripley ON, N0G 2R0



**Prepared by:**

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



Shared Tower



Shared Tower

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

January 9th, 2023

Township of Huron-Kinloss  
21 Queen Street, P.O. Box 130  
Ripley ON, N0G 2R0

**Re: Proposed Telecommunication Antenna Structure at Coordinates: 44.093111, -81.414781, No Municipal Address**

---

Shared Tower Inc. (Shared Tower) is pleased to submit this Telecommunication Tower application for a Letter of Concurrence to the Township of Huron-Kinloss.

The proposed tower is a 65 metre self-support tower structure designed to support multiple co-location opportunities. The tower is proposed to be located at the coordinates: 44.093111, -81.414781 on an Agricultural Rural (AG4) zoned property, with no municipal address.

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 Township of Huron-Kinloss 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,

Sandra Hallig  
Planning Coordinator  
Shared Tower Inc.  
(416) 388-1263  
shallig@sharedtower.ca

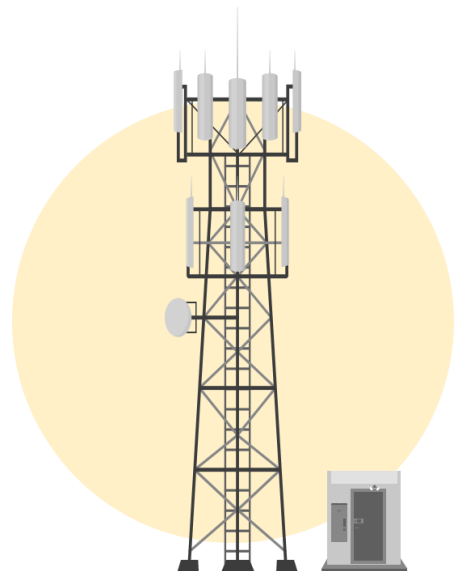


Shared Tower

## 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 the coordinates: 44.093111, -81.414781, no municipal address (Subject Site). The subject property is a Agricultural Rural (AG4) zoned site, approximately 257,178.75 square meters in area or approximately 63.55 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.





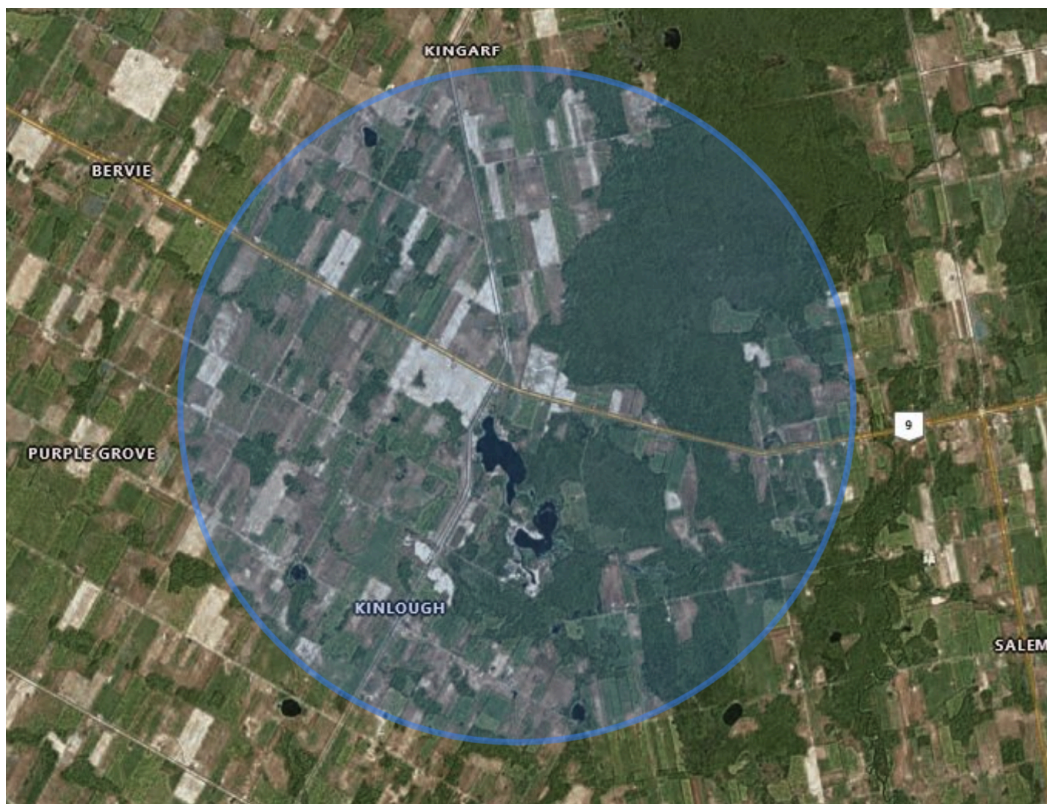
## 2. Coverage Objective

Broadly, Shared Tower has identified a need for improved telecommunications network coverage in the Huron-Kinloss and surrounding areas. The proposed tower is a 65 metre self-support 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 Township of Huron-Kinloss. At 65 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 the coordinates: 44.093111, -81.414781, no municipal address (legal description: LT 21 RANGE 1 SDR KINLOSS, PTS 3, 4 & 5 3R3658 TOWNSHIP OF HURON-KINLOSS).

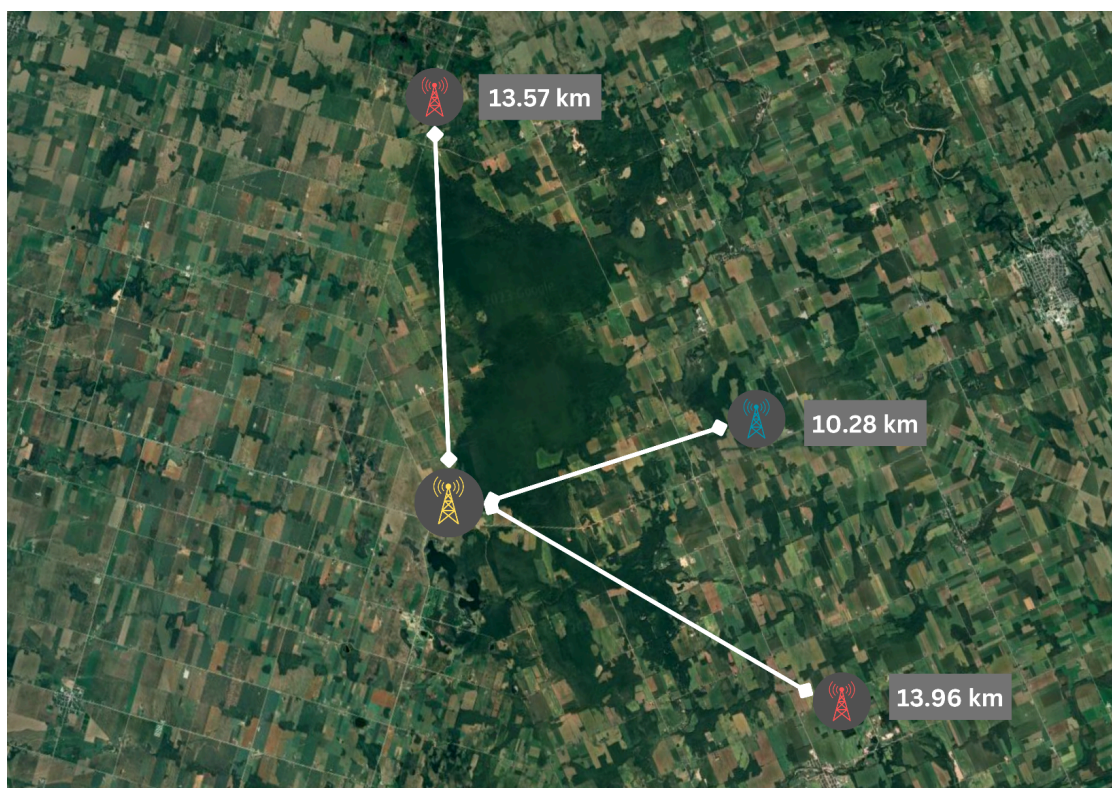
The proposed location comprises approximately 63.55 acres of land zoned for Agricultural Rural (AG4) Zone uses allowing for a considerable setback from the majority of residents.

### 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 2, the closest existing towers to the proposed tower are three facilities located approximately 10.28 km and 13.96 km to the Southeast, as well as, one located to the North approximately 13.57 km away. These distances depict a substantial coverage gap.

Figure 2: 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 property to the Subject Site is located approximately 136.7 metres to the Northwest at 20 Silver Lake Rd, Holyrood, ON.

### **Land Use & Public Realm Considerations**

The Subject Site is located in a rural setting away from the majority of residential development and currently used for Agricultural Rural (AG4) 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.



Shared Tower

## 5. Proposed Telecommunication Antenna Structure

Shared Tower is proposing to construct a 65 metre self-support tower on the Subject Site.

### Preferred Tower Type

The self-support 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. In comparison to other tower designs, such as a monopole design, the self-support tower design is consistent with the typical structures installed in rural areas and ensures minimal visual impact.

### Preferred Tower Height

The proposed self-support tower has been designed at a height of 65 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 Huron-Kinloss and surrounding areas.

### Control of Public Access

The proposed tower will include a locked and electronically monitored mechanical equipment shelter. Fencing will be installed around the base of the tower and the equipment shelter will include one locked gated access point.

### Design Considerations & Screening

The tower structure is proposed to be located on the Northern area of the Subject Site. The proposed tower is placed at the coordinates: 44.093111, -81.414781 which is approximately 39.7 m from Silver Lake Road and 13.6 m from the property line of the neighbouring property to the East. Though telecommunication towers are not subject to local planning controls such as zoning bylaws or municipal setback requirements, Shared Tower Inc. considers a variety of factors in regard to the placement of towers on a property such as: municipal preference, existing and adjacent uses, road and hydro access, landowner preference, and solutions to meet carrier requirements. The setbacks of the proposed telecommunications tower results in the least amount of disruption to the existing and adjacent agricultural rural uses and ease of access from Silver Lake Road. Increasing these setbacks would run the risk of extending the access road from Silver Lake Road, which would disturb existing farm fields and arable land. Trees or other vegetation may be required to be removed or disturbed during the installation or operation of the proposed tower.



## 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***

ISED has established a default public consultation process that proponents must follow in the absence of the local land use authority (i.e., Huron-Kinloss) having an established and documented public consultation process. Huron-Kinloss does not have an established process under which this proposed tower application will proceed. ISED's public consultation process was reviewed to ensure the minimum requirements of both parties, Huron-Kinloss and ISED, 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. When the aforementioned parties have determined if any aeronautical safety features are required for the proposed tower, this information will be provided to the Township of Huron-Kinloss



**Shared 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:

**Southwestern Ontario District Office**

4475 North Service Road, Suite 100

Burlington, ON L7L 4X7

Tel: 1-855-465-6307

Fax: 905-639-6551

Email: [ic.spectrumswodo-spectrebdsoo.ic@canada.ca](mailto:ic.spectrumswodo-spectrebdsoo.ic@canada.ca)

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



Shared Tower

## 7. Conclusion

Shared Tower has proposed a new tower in the Township of Huron-Kinloss 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.

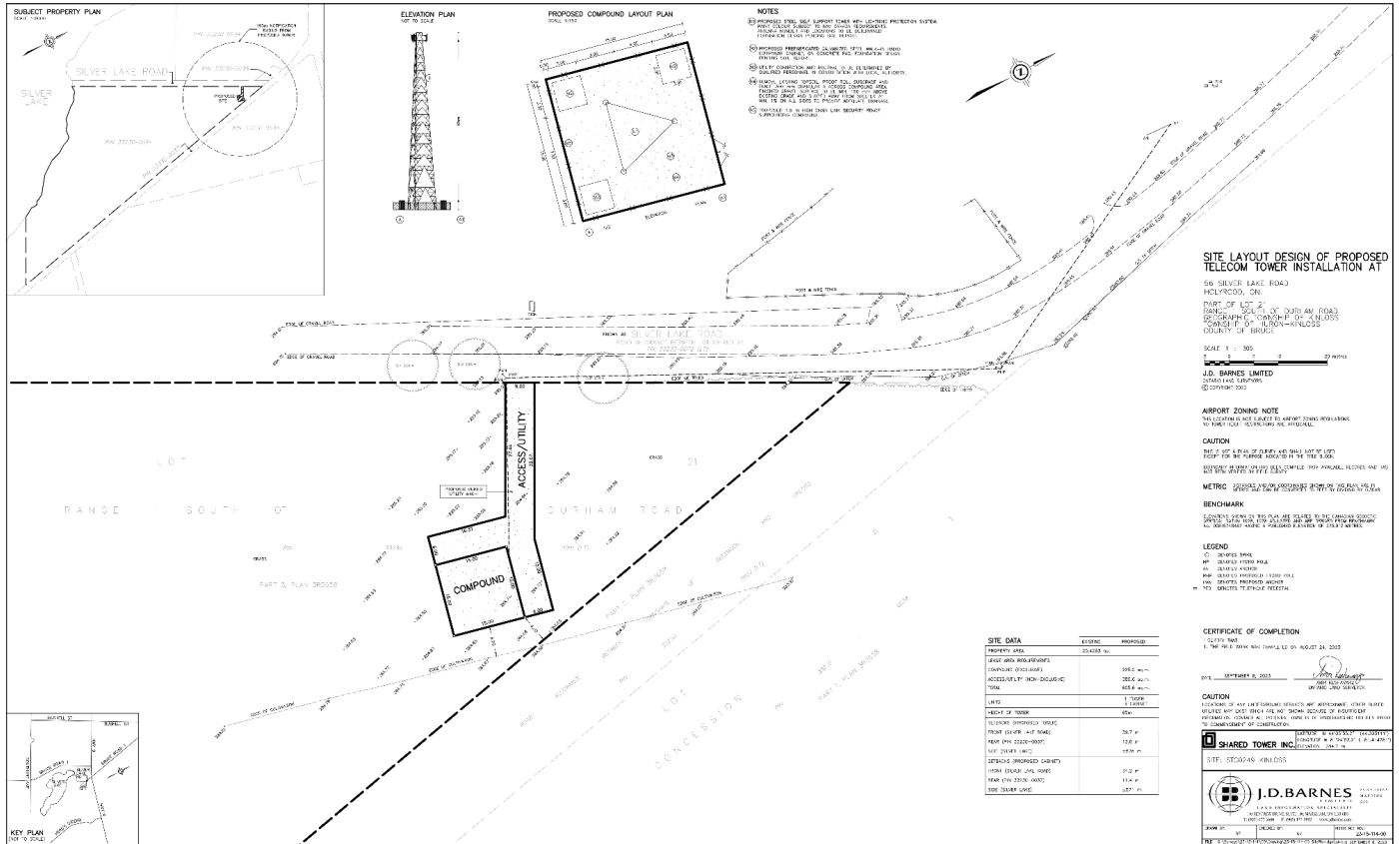
Shared Tower believes this proposal:

- Works toward bridging the urban-rural connectivity divide by filling an identified network need in Huron-Kinloss;
- 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 Township of Huron-Kinloss.

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 Township of Huron-Kinloss to continue to build an efficient telecommunications network for the community while ensuring its objectives are met.



Appendix A: Site Plan







Shared Tower

## Appendix B: Site Renderings





**Shared Tower**

**Shared Tower Inc.**  
**1300 Cornwall Rd., Unit 101**  
**Oakville, ON L6J 7W5**  
**info@sharedtower.ca | (647) 362-0111**