

February 14th, 2022

Township of Wellington-North
Planning and Development Department
7490 Sideroad 7 W, PO Box 125
Kenilworth, Ontario
N0G 2E0

Re: **Proposed New Telecommunications Tower Installation**
6832 Wellington Road 109 Kenilworth, ON N0G 2E0
File No. STC0234- Teviotdale

Introduction

On behalf of our client, Shared Tower Inc., Steward Logistics is proposing a new wireless telecommunications facility at 6832 Wellington Road in the Township of Wellington-North. The subject property is an Agricultural zoned site, approximately 125.4 acres in size. The proposed tower will be located at the back of the existing barn on site within a 15m x 15m compound. For reference, the tower will be located at the following coordinates: 43.845809, -80.735124.

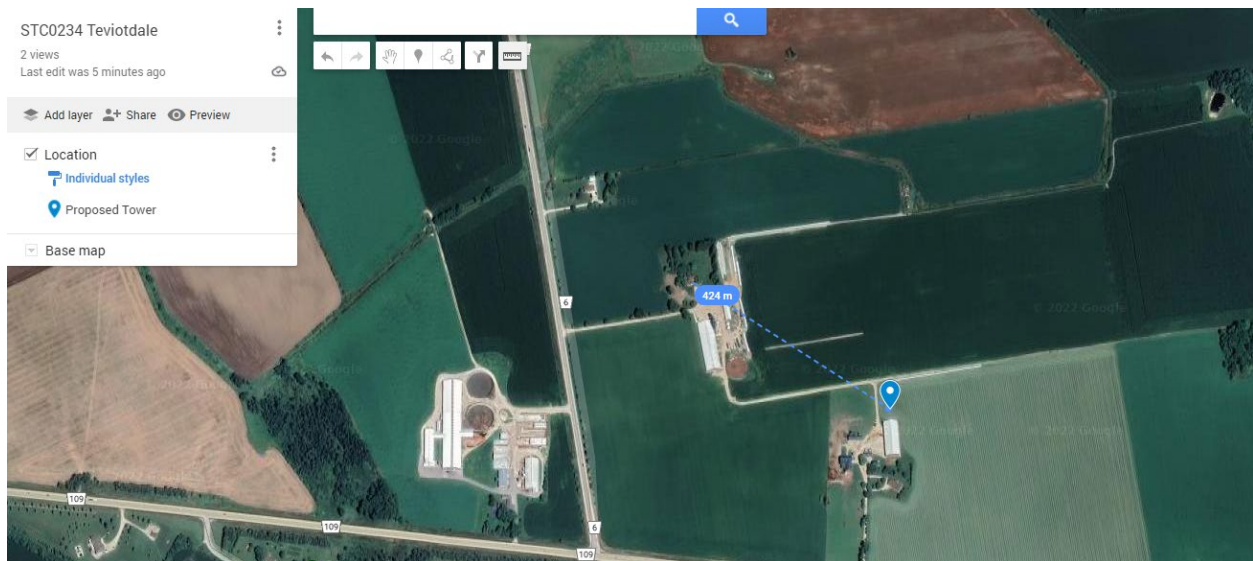


Figure 1: Proposed 70m Self-Support Tower Location (Blue marker) and distance from closest residential area

The proposed tower is a 70m Self-Support Tower installation, engineered to accommodate initial and future loading for all carriers interested in collocating on the tower, as well as supporting additional fixed wireless equipment as required.

As the proposed tower is located within an Agricultural (A) zoned area the location is separated from dense residential areas while still ensuring coverage and network capacity for all wireless network providers. Currently there is no tower in the area within a 6km radius, resulting in a gap in signal propagation and no opportunity to improve service for other providers.

Coverage Objective

The proposed installation is designed to improve wireless services in Teviotdale and the surrounding residential areas to the north and west of County Road 109. The tower is required to address the continually increasing demand for wireless voice and data services to provide a reliable level of service for devices such as cellphones and a host of other connected devices and sensors.

The surrounding residential community in Teviotdale will greatly benefit from increased cellular coverage, since cellular devices are increasingly used over the use of traditional land lines and are therefore the primary means of accessing 911/emergency services. These services are important for rural areas since they are located farther away from dense urban areas where many of these essential services are concentrated. Furthermore, as more residents shift to working from home there will be a need for additional capacity for high quality data and voice services.

Site Selection / Land Use Considerations

Shared Tower Inc. acknowledges the *Provincial Policy Statement (2020)* which provides policy direction on matters of provincial interest related to land use planning and development. This policy forms the foundation for regulating development and use of land while supporting the provincial goal to enhance the quality of life for all Ontarians. The PPS recognizes municipal official plans as the vehicle for achieving and implementing comprehensive, integrated and long-term planning goals in Ontario. *The Provincial Policy Statement (2020)* specifies that the goal of long-term economic prosperity includes supporting telecommunication infrastructure. In addition to providing a greater area of coverage, this new tower installation will promote economic growth by connecting the local rural community to urban areas and increasing working opportunities via telework.

According to the *Wellington County Official Plan (2019)*, the site is designated as Prime Agricultural and Core Greenland. Prime agricultural areas are reserved for all types of agricultural uses and, as per section 6.4 of the Official Plan, normal farm practices are promoted in these areas in accordance with provincial standards under. In accordance with section 6.4.9, community service facilities can be located in prime agricultural areas for reasons of public safety or government service delivery. Our team believes that having a reliable communication service fits both of these criteria and telecommunication towers, such as the proposed, helps to support the growth of rural community in Teviotdale.

Section 8.9 describes core Greenland as being identified as hazardous areas, which pose a threat to property or human life or have inherent limitations to development. The lands are characterized hazardous, because of steep slopes and uneven terrain. We do acknowledge that there is a small portion of the property with this designation but it is not within proximity to the proposed area of the tower. Furthermore, we have contacted the Maitland Valley Conservation Authority and requested a property check that has verified our location. This property check will be attached in a separate document as part of our application.

The site is zoned as Agricultural (A) and Natural Environment (NE), under sections 8 and 30 respectively in the Zoning By-law (2018), but does not explicitly permit the development of a telecommunication tower in its list of permitted uses. However, section 6.34 states that nothing contained in this By-Law shall prevent the any telecommunication provider from installation or maintaining utilities or services that includes a communication or cellular telephone tower. Our team has provided appropriate setbacks from property lines and maintained a setback of 434m from the closest residential area as illustrated in Figure 1.

Shared Tower Inc. will continue to work with the Township of Wellington-North and follow ISED Canada's Protocol for Tower Installations.

Screening Measures / Design

The proposed structure is a Self-Support Tower as illustrated in the photo simulations in Exhibit "B" of this report. It will be located at 6832 Wellington Road at the rear of the barn on site within a 15m X 15m compound. In addition, because of its positioning on the subject property, the existing residential building and barn will screen the base and lower portion of the proposed tower, and ensure limited visibility of the base of the tower from the neighboring residents. The proposed tower will occupy unused space and will not impact any of the existing residential areas or

agricultural activities. All cabinets to support the tower will be located within the fenced compound in the same area as the tower, which will be surrounded by a 1.8m high chain link fence to avoid graffiti. The tower will be a steel, non-reflective self-supported style tower and any additional lighting and markings will be detailed pending our application to NAV Canada.

Setbacks from Existing Antenna Sites / Co-location Opportunities

The configuration of modern wireless networks requires relatively close proximity between cellular towers / base stations to ensure sufficient coverage and network capacity.

Currently there is no existing tower within a 6km radius of the proposed site to provide collocation opportunities. As illustrated by Figure 2, the proposed tower is ideally situated in the area to support service for all wireless service providers and is consistent with the configuration of wireless networks throughout the municipality. The other identified towers do not have the required height, cannot support the equipment required for additional carriers, or are outside the coverage area for collocation. Additionally, the proposed tower will be suitable for multi-carrier collocation and eliminate the need for additional towers in the immediate area.

The majority of Teviotdale has towers around major intersections. In the vicinity of the proposed tower, there is a Rogers tower installation at Road 152 and County Road 109 with a height of 100m. It is a Guyed Wire Tower that is outside the service area of Teviotdale and is the closest tower installation in proximity the proposed installation. Additionally, there is a Bell Mobility installation atop a water tower in a CNR (Canadian North Railway) Park at a height of 51m. It is an antenna that does not possess the capacity or equipment to support collocation.

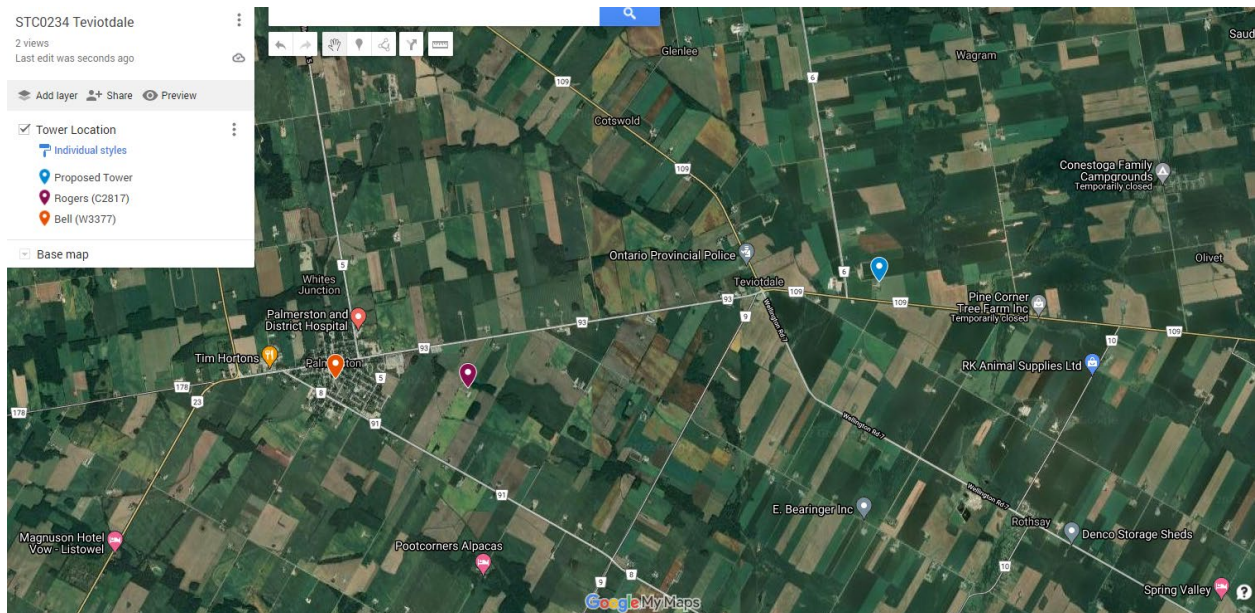


Figure 2: Existing Cellular Facilities in the Vicinity of the Subject Property

Control of Public Access

Equipment to support the tower will be located within the tower compound with no public access. All service provider equipment cabinets will be monitored for unauthorized access and be further protected with lights / motion detectors.

Health Canada Safety Code 6 Compliance

Health Canada's role is to protect the health of Canadians, so it is the Department's responsibility to research and investigate any possible health effects associated with exposure to electromagnetic energy, such as that coming from cell phones and base stations. Health Canada has developed guidelines for safe human exposure to RF energy, which are commonly known as Safety Code 6. Safety Code 6 has been adopted by ISED Canada and is included in their regulatory documents on radiocommunication licensing and operational requirements. ISED Canada requires all proponents and operators to ensure that their installations and apparatus comply with the Safety Code 6 at all times.

Shared Tower Inc. attests that the radio antenna system described in this notification package will 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 additional carrier co-locations and nearby installations within the local radio environment. For more information on Safety Code 6, please visit the following Health Canada site: www.healthcanada.gc.ca/radiation.

Canadian Environmental Assessment Act

Shared Tower Inc. attests that the radio antenna system as proposed for this site will comply with the Canadian Environmental Assessment Act, as the facility is exempt from review. The Federal government revised the Canadian Environmental Assessment Act in July 2012. Only radiocommunication antenna and supporting structures that are part of or incidental to projects that are designated by the Regulations Designating Physical Activities or otherwise designated by the Minister of the Environment as requiring an environmental assessment are subject to the CEAA, 2012. The proposed location creates no impact on area environmental features. No trees or vegetation will be removed to accommodate the installation.

Transport Canada's Aeronautical Obstruction Marking Requirements

Shared Tower Inc. attests that the radio antenna system described in this justification report will comply with Transport Canada / NAV CANADA aeronautical safety requirements. When Transport Canada / NAV Canada have determined if any aeronautical safety features are required for the installation, such information will be provided to the City.

For additional detailed information, please consult Transport Canada at:

<http://www.tc.gc.ca/eng/civilaviation/regserv/cars/part6-standards-standard621-512.htm>

Engineering Practices

Shared Tower attests that the radio antenna system as proposed for this site will be constructed in compliance with the applicable CSA codes (S37-18), or any applicable successor code) and comply with good engineering practices including structural adequacy.

Contact Information

Share Tower Inc.'s agent for this proposal, Steward Logistics, can be contacted via the following methods:

Steward Logistics Inc., on behalf of Shared Tower Inc.
146 Thirtieth Street, Suite 100
Etobicoke, ON M8W 3C4
steven@stewardlogistics.com

Municipal Consultation Process

Shared Tower Inc. builds and operates shared wireless telecommunications infrastructure, designed to ensure that service providers can address their customers' needs in the most efficient manner. In Canada, wireless communications facilities are a federal undertaking, and consequently Shared Tower is required by ISED Canada to consult with land-use authorities in siting telecommunication infrastructure locations.

The consultation process established under ISED Canada's authority is intended to allow the local land-use authorities the opportunity to address land-use concerns while respecting the Federal government's exclusive jurisdiction over the siting and operation of wireless and data systems.



Shared Tower Inc. welcomes comments from the municipality and its agencies to address any expressed comments that are deemed relevant by Industry Canada's CPC-2-0-03 Issue 5.

ISED 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 ISED Canada. Shared Tower Inc. is participating in this consultation in accordance with ISED Canada's guidelines CPC-2-0-03 Issue 5.

For more information on ISED Canada's consultation guidelines including CPC-2-0-03 contact <http://www.ic.gc.ca/epic/site/smt-gst.nsf/en/sf08777e.html> or the local ISED Canada office:

ISED Canada, Spectrum Management
Southwestern Ontario District Office
4475 North Service Road, Suite 100
Burlington, ON L7L 4X7
Tel: 1-855-465-6307
Fax: 905-639-6551
Email: SpectrumSWODO-SpectreBDSOO@ised-isde.gc.ca

General information relating to antenna systems is available on ISED Canada's Spectrum Management and Telecommunications website: <https://www.ic.gc.ca/eic/site/smt-gst.nsf/eng/home>



Conclusion

Steward Logistics believes that the proposed site is the only possible solution to maintain and enhance the current coverage area and network capacity in the vicinity of the tower and provide service for the other major network providers. The siting of the tower on an Agriculture zoned property, at the furthest point possible away from the residences in the area, greatly increases the setback to residents relative to the existing tower and meets the recommendations and the spirit of the Town's Official Plan and Zoning By-law.

Best regards,

Steven Ramjass

Steward Logistics, on behalf of Shared Tower Inc.

Exhibit B: Photo Simulations (Before / After Views)



Before (View 1 from County Road 109 and Side Road 3)



After (View 1 tower superimposed on artist's rendering)