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Date January 23, 2025 **Report No.** 2025-38

To Chair and Members
Planning Committee

From Nicole Wilmot, Director of Planning and Development
People, Legislated Services & Planning

1.0 Type of Report

Consent Item [X]
Item For Consideration []

2.0 Topic 195 Savannah Oaks Drive – Application for Telecommunication Tower [Financial Impact – None]

3.0 Recommendation

- A. THAT Innovation, Science and Economic Development Canada BE ADVISED that pursuant to Report 2025-38, the City of Brantford has no concerns and concurs with Signum Wireless Towers Inc.'s proposed installation of a telecommunication tower to be located at 195 Savannah Oaks Drive; and,
- B. THAT Staff BE DIRECTED by Council issue to issue a Letter of Concurrence to Innovation, Science and Economic Development Canada for the proposed telecommunication tower at 195 Savannah Oaks Drive.

4.0 Executive Summary

Fontur International Inc. has submitted a telecommunications tower application on behalf of Signum Wireless Towers Inc. for the subject lands municipally known

as 195 Savannah Oaks Drive. In 2018, the City of Brantford established an Antenna System Siting Protocol to guide the placement of antenna systems while considering natural features, historic legacy, and unique characteristics. The protocol outlines a local land use consultation framework as well as establishes an objective process, criteria, and guidelines for siting proposals. As a result, this provides the necessary information to satisfy Innovation, Science and Economic Development Canada (ISED) requirements, resulting in an informed statement of concurrence or non-concurrence. Staff have utilized the Antenna System Siting Protocol to assess the proposal and consider it to be satisfactory. Staff supports issuing a letter of concurrence to ISED for this installation.

5.0 Purpose and Overview

This report provides Council with comprehensive information and analysis regarding the installation of a telecommunication tower at 195 Savannah Oaks Drive, as shown on the site plan attached as **Appendix A**. The design proposes a 50-meter tall lattice tri-pole tower within a 12 m x 12 m fenced compound, situated on an industrial property, as shown on the site photos with the superimposed tower attached as **Appendix B**. The installation is intended to enhance telecommunication coverage to the surrounding area in Brantford, without adversely affecting adjacent land uses.

6.0 Background

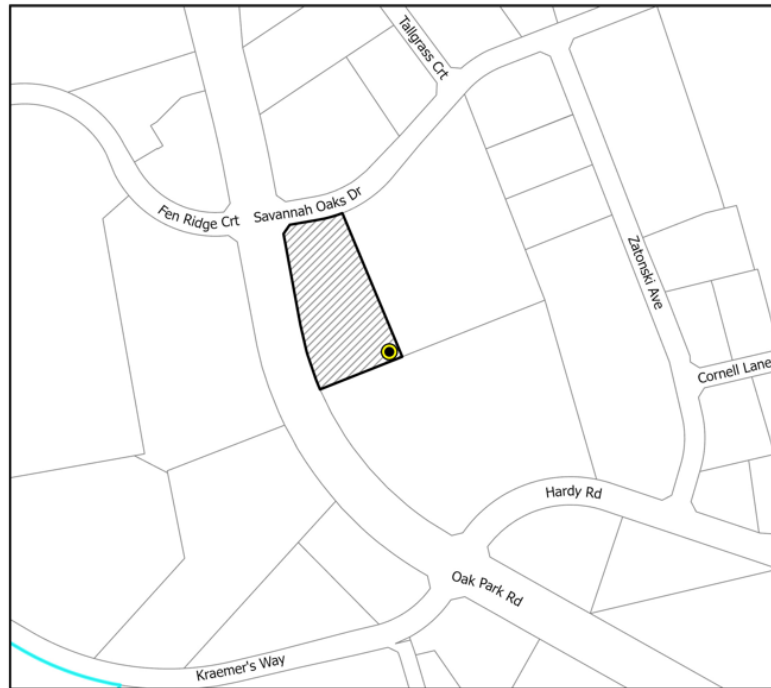
6.1 Site Features and Surrounding Land Use

The proposed tower will be located in the southeast corner of the subject lands, encompassing a 144 m² compound, as shown on the location map included as **Figure 1**. **Figures 3** and **4** below show photographs of the subject lands with a red arrow pointing to the location of the proposed tower. The remaining area of 150 Savannah Oaks Drive would continue to be occupied by the existing industrial building.

Figure 1 - Location Map

LOCATION MAP

Telecommunication Application: AS-02-2024
195 Savannah Oaks Drive



Immediately surrounding the subject lands are various industrial properties and buildings, see the aerial photo map included as **Figure 2**. Further east and west of the subject lands are areas of open space and natural heritage features, with the Grand River immediately west of that. The nearest residential dwellings are located roughly 1000 m south of the subject lands.

Figure 2 - Aerial Photo

AERIAL PHOTO MAP

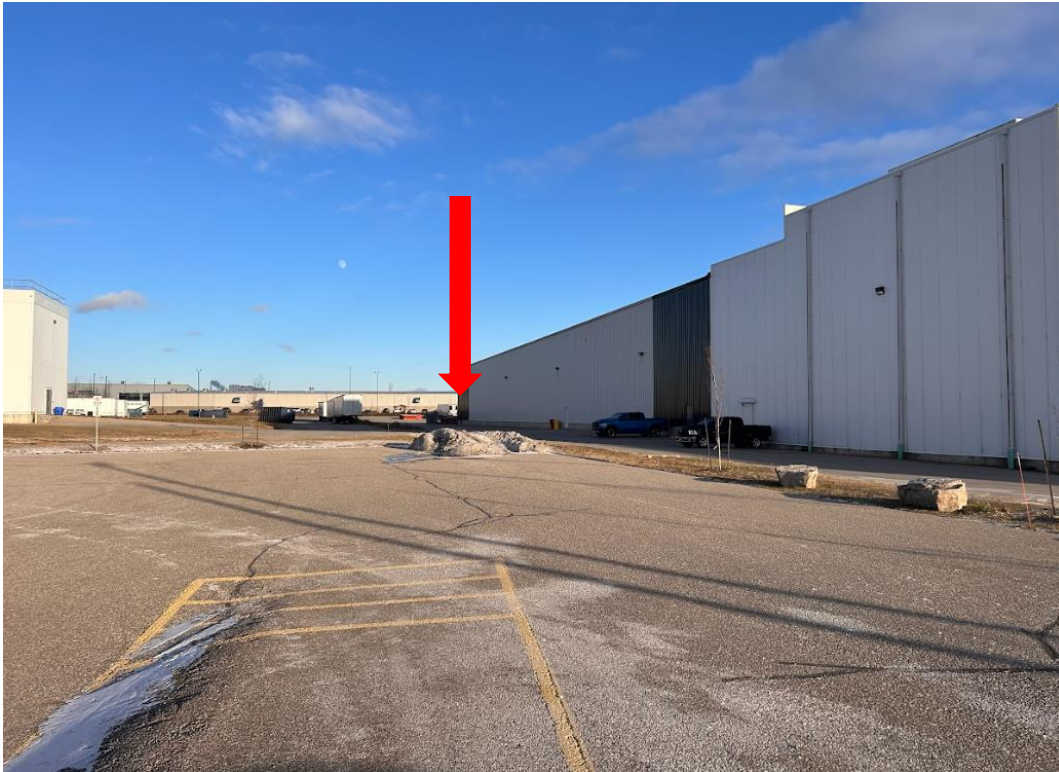
Telecommunication Application: AS-02-2024
195 Savannah Oaks Drive



Figure 3 - Site photo of the proposed location of the telecommunication tower



Figure 4 - Site photo of the proposed location of the telecommunication tower



6.2 Proposal Description

Signum Wireless Towers Inc. proposes a 50-meter tall lattice tri-pole tower accompanied by telecommunications equipment. The proposed tower would be situated within a 12 x 12 metre fenced compound with chain-link and barbed wire-topped fencing installed around the base of the tower and equipment shelter and would include one locked gate access point (see the site plan attached as **Appendix A** and site photos with the superimposed tower attached as **Appendix B**).

Access to the tower will be via the northern property boundary from Savannah Oaks Drive. The proposed height is required to provide optimal coverage to the area and to connect calls effectively to surrounding towers in the network. This proposal aligns with the City's Protocol for communication towers and fulfills ISED's consultation requirements. More supporting information is included in Section 9.0 of this Report.

7.0 Corporate Policy Context

7.1 2023-2026 Council Priorities

This report is in line with the City of Brantford Council Priorities established in January 2023, specifically the priority of ensuring safety and security in all neighbourhoods. The proposed telecommunication tower will enhance wireless service, benefiting personal, business, and emergency uses, and contributing to a safer and more connected community.

7.2 Provincial Planning Statement (2024)

The Provincial Planning Statement, 2024 (PPS) defines infrastructure as “*physical structures (facilities and corridors) that form the foundation for development*”. The definition then provides a breakdown of types of infrastructure, which includes communications/telecommunication infrastructure. Section 3.1 of the PPS states that “*infrastructure and public service facilities shall be provided in an efficient manner while accommodating projected needs*”. The proposed telecommunication tower will improve telecommunication speed and coverage for future users of the surrounding lands, thus, accommodating projected needs. Staff is of the opinion that the proposal is consistent with the PPS.

7.3 City of Brantford Antenna System Siting Protocol, 2018

Municipal review of telecommunication towers and antennas in Brantford is governed by the Antenna System Siting Protocol, approved by Council June 26, 2018. The Protocol sets out detailed procedures for the review of telecommunication facilities to be installed in the City, including:

- Site selection guidelines
- Public consultation
- Design criteria
- Municipal response

The municipal review and public consultation process for the proposed telecommunication tower has been completed in accordance with the Antenna System Siting Protocol. Planning Staff’s analysis of this proposal as it relates to the Protocol is provided in Sections 8.0 and 9.0 of this Report.

7.4 City of Brantford Official Plan (Envisioning Our City: 2051)

The proposed telecommunication tower was also reviewed within the context of the City of Brantford Official Plan. Under Section 8.1.d of the Official Plan, municipal service infrastructure and public and private utilities are permitted in any land use designation. Section 8.2.a encourages the “*co-location of linear utilities and telecommunication facilities*”. Section 8.2.b requires that “*appropriate locations are identified and/or cluster sites have been determined which take into consideration the location requirements for larger infrastructure elements.*” The proposed telecommunication tower facilitates coordination between telecommunication utilities and will reduce the potential for tower proliferation by multiple carriers needing space for their equipment due the “third-party” approach (see Section 9.1 of this Report for more information). Staff is of the opinion that this proposal conforms to the City of Brantford Official Plan.

7.5 City of Brantford Zoning By-law 160-90 & City of Brantford Zoning By-law 124-24

The subject lands are zoned ‘General Industrial Zone - Exception 26 (M2-26)’. Zoning By-law 160-90 classifies a telecommunication tower as a “Public Service”, which is permitted in all Zones, as per Section 6.1.1.3.

The subject lands are zoned ‘General Employment Zone – Exception 20 (GE-20)’ under the City’s new By-law 124-24. Similar to By-law 160-90, telecommunications services are included under the umbrella term of “Public Services”. Section 4.201 defines Public Services as “...*any... telecommunications network or other similar services provided by a public agency...*”. Section 3.32 of the By-law indicates that “Public Services” are permitted in all zones. Thus, Planning Staff conclude that the proposed tower would conform to Zoning By-law 160-90 and Zoning By-law 124-24.

8.0 Input From Other Sources

8.1 Technical Liaison Response

This proposal was circulated to internal departments and external agencies for review, and no concerns were raised.

8.2 Public Response

In accordance with the Antenna System Siting Protocol, the proponent issued a notice by regular mail on November 12th, 2024, to all property owners within the prescribed distance of 150 metres, as shown in the Area of Notification Map attached as **Appendix C**. According to the Antenna System Siting Protocol, the prescribed distance is to be determined by taking the greater of 120 metres or three times the antenna system height. In this case, 150 m (50 m height x 3) was greater. The public notice that was sent out is attached as **Appendix D**. With the last day to comment being December 18th, 2024, nearby owners had more than 30 days to provide comments and no comments were received. Due to the lack of public interest shown, no neighbourhood meeting was held. A more detailed Public Consultation Summary Report was provided by the applicant and is attached as **Appendix E**.

9.0 Analysis

9.1 Site Selection

The applicant has determined the need for a service upgrade to adequately provide continuous coverage and service to their existing and future customer base in the City of Brantford based on radio frequency engineering. Signum Wireless's objective for this location is to provide the infrastructure for reliable coverage and capacity in commercial areas and frequently travelled corridors near west Brantford and Highway 403. As illustrated in **Figure 5**, there is a gap in wireless telecommunications infrastructure in the area of coverage need (existing infrastructure is represented by markers on the map). All existing infrastructure is located at least 1.6 kilometres away from the centre of the search area. Additionally, the majority of the structures in the area are low-rise buildings, so a rooftop installation was also not viable as the signal would not travel far. Therefore, a new tower has been proposed at the location shown in the location map included as **Figure 1** and the aerial photo map included as **Figure 2**.

Figure 5 - Current Telecommunications Infrastructure surrounding the subject lands



Section 7.1.2 of the Antenna System Siting Protocol details preferred locations should a new tower be constructed as follows:

- *Industrial and commercial areas.*
- *Mounted on buildings or existing structures with appropriate screening.*
- *Located in a manner that does not adversely impact view corridors such as public views and vistas of important natural or manmade features.*
- *Transportation and utility corridors.*
- *As near as possible to similarly scaled structures.*
- *Institutional uses where appropriate, including, but not limited to, those institutions that require telecommunications technology: emergency services, hospitals, colleges and universities.*
- *Areas that maximize the distance from Residential Areas.*

The tower is proposed to be located in an industrial area, and it will be set back approximately 200 metres from Savannah Oaks Road and 150 metres from Oak Park Road. It will be surrounded by industrial buildings, which will assist in screening the tower from view. The proposed location is

approximately 1000 metres away from the nearest residential property. Attached as **Appendix B** are photos of the proposed tower superimposed on the subject lands, providing context of the surrounding land uses. The proposed tower location is considered an acceptable location as it is consistent with the preferred locations for new towers as set out in the Antenna System Siting Protocol.

Signum Wireless also supports co-location on existing towers and structures and designed the tower to accommodate future carriers on the tower, also known as the “third-party model”. The difference between traditional tower proliferation compared to the “third-party model” is shown in **Figure 6**. The use of existing structures minimizes the number of new towers required in a given area and is generally a more cost-effective way of doing business. It also allows the City to reduce the potential for tower proliferation by multiple carriers needing space for their equipment. The proposed tower is designed to support and indeed encourage a number of additional carriers.

Figure 6 - Traditional Tower Proliferation compared to the “third-party model”



10.0 Financial Implications

There are no direct municipal financial implications respecting this proposal.

11.0 Climate and Environmental Implications

No negative climate or environmental impacts are anticipated as a result of this application. The lands are currently designated General Employment and zoned for industrial uses and will continue as such if the proposed telecommunications tower is constructed.

12.0 Conclusion

The installation of a telecommunication tower proposed by Signum Wireless Towers Inc. will provide three or more carriers or other broadcasters with the ability to install their equipment on the tower. This will reduce the number of towers required in this area in the future as well as improve telecommunication coverage in an underserved area in the City of Brantford, with no adverse impact on adjacent land uses. The proposal has followed the procedures and met the requirements set out in the City's Antenna System Siting Protocol. The proposed tower is consistent with the Provincial Planning Statement, consistent with the City's Official Plan policies, conforms to Zoning By-law 160-90 and Zoning By-law 124-2024.

Based upon the above review, Staff supports providing a letter of concurrence to ISED with respect to this installation of the proposed telecommunications tower on the subject lands.



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Director of Planning and Development Services

Prepared By:

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Attachments (if applicable)

- Appendix A – Site Plan
- Appendix B – Site Photos with Superimposed Tower
- Appendix C – Area of Notification
- Appendix D – Public Notice
- Appendix E – Public Consultation Summary Report

In adopting this report, is a by-law or agreement required? If so, it should be referenced in the recommendation section.

By-law required yes no

Agreement(s) or other documents to be signed by Mayor and/or City Clerk yes no

Is the necessary by-law or agreement being sent concurrently to Council yes no