

February 6th, 2025

Mayor Abraham Zebian
Deputy Mayor Debbie Francis
Councillor Rupert Jannasch
Councillor Scott McLean
Councillor Chrystal Remme
Councillor Paul Wheadon
Councillor Bob Morton
Councillor Kayla Leary-Pinch
Councillor Paul Morton
Councillor John A. Smith
Councillor Bonnie Smith
Councillor Jim Ivey

Mayor Zebian and Councillors:

RE: Shared Tower Telecommunications Tower - 19 Highway 236, Newport, NS B0N 2A0

In December 2024, Shared Tower Inc. received a Letter of Concurrence for the proposed telecommunications tower located at 19 Highway 236, Newport, NS B0N 2A0 (Subject Site) with the application originally submitted in March 2024. Through this letter, Shared Tower hopes to provide Council members with further insight as to why the Subject Site was chosen, further insights into the Site Selection process, and alternative locations explored within the area.

Rationale for Proposed Telecommunications Tower

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.

Early discussions between Shared Tower and West Hants municipal officials emphasized the great need for improved coverage within the Municipality, especially in situations of emergencies and to enhance disaster preparations within West Hants and the Province. After an extensive search for a location in the area to address serious network concerns, Shared Tower proposed a new tower at 19 Highway 236, Newport, NS B0N 2A0

(Subject Site). 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 safety measures in the community. This tower is 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. Shared Tower works with multiple service providers to enable further connectivity to communities.

Existing Infrastructure

Prior to proposing a new tower, Shared Tower reviewed the location of existing telecommunications towers for co-location opportunities. As shown in Figure 1 below, the closest existing towers to the proposed tower are three facilities located approximately 7.03 km away from the Subject Site to the South. These distances depict a substantial coverage and capacity gap for the area's wireless network.



Figure 1: Subject Site Relative to Nearby Telecommunications Towers

Site Selection Process

The Site Selection stage is an important part of Shared Tower's planning process. Our Site Acquisition Specialists, Network Planners and Carrier Relations specialist work hand-in-hand to ensure the locations selected will achieve the following goals for the National service providers:

- Meet carrier requirements (ie) search areas, height requirement, tower design style
- Strategically placed in areas identified to have poor coverage
- Reduce the amount of future infrastructure developments in the area

Due to subscriber feedback and other data factors such as dropped calls or quality of calls, we were made aware of coverage deficiencies in the surrounding area. A survey of this area identified a proposed site that will achieve the necessary engineering coverage objectives for the network. The siting of the tower locations is dependent on a number of factors. Among the factors considered are:

- expected usage patterns of service and proximity to users
- local topography and building types
- interaction with existing and future sites
- line-of-sight requirements for high-quality communications
- opportunities to use existing structures
- availability of a willing Landlord
- the industry's commitment to high service standards and customer satisfaction

Public Consultation

Innovation, Science, and Economic Development (ISED) Canada has established a default public consultation process that proponents must follow in the absence of the local land use authority (i.e., West Hants) having an established and documented public consultation process. The Regional Municipality of West Hants does not have an established process under which this proposed tower application will proceed. ISED's public consultation process was reviewed to ensure the requirements of both parties, West Hants and ISED, will be met by Shared Tower.

Throughout the Public Consultation Process, Shared Tower was made aware of concerns from one member of the public in regard to site selection and why the Subject Site was selected as the ideal candidate for this proposal. Shared Tower understood these concerns and disclosed all relevant information available to us. Shared Tower has made efforts to ensure all comments and concerns deemed reasonable and relevant by ISED, were addressed, and that the proposed tower location fulfills the network requirements listed above, while also abiding by local regulations set specifically for telecommunications infrastructure.

Alternative Locations Investigated

Alternative locations were investigated in Shared Tower's Site Selection stage to ensure that the chosen location meets the requirements listed above, while also considering proximity to sensitive land uses and Municipal requirements in place. For properties that were likely to have carrier interest and met property lot size requirements, on-site visits were conducted by Shared Tower's Site Acquisition Specialists.

Given the great need for improved coverage in the area, alternative locations were also brought forth to Shared Tower's Site Acquisition Specialists by Municipal Staff and other community members offering their properties for the proposed tower. Through further investigation and discussions, these alternatives were unfortunately disqualified for reasons such as elevation concerns and size of property lots to accommodate the proposed tower.

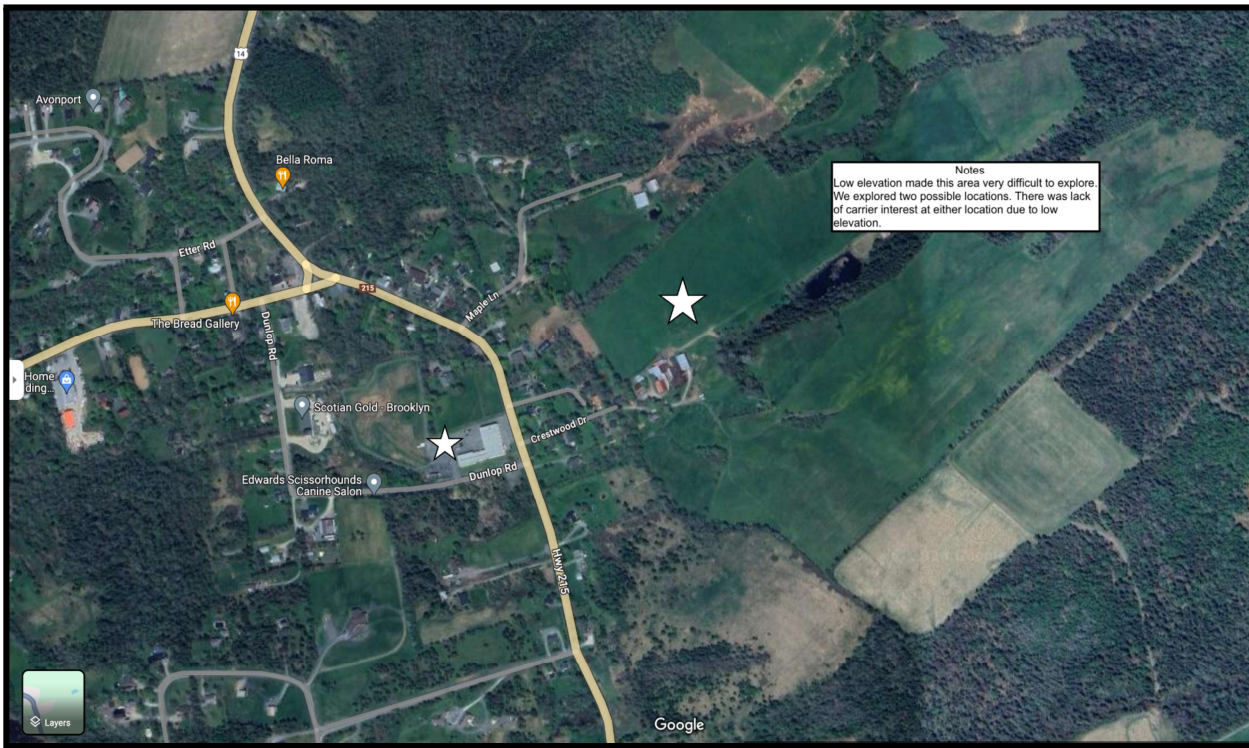


Figure 2: Alternative Locations in Brooklyn

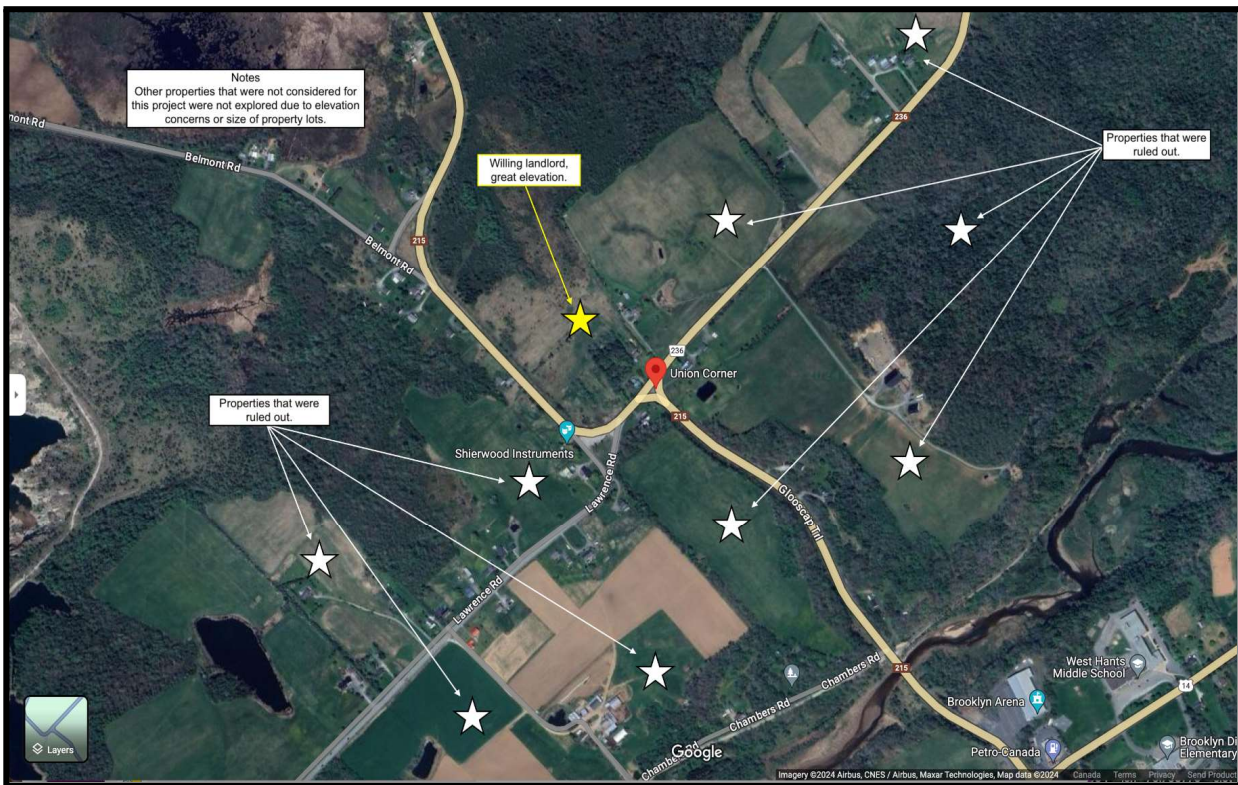


Figure 3: Alternative Locations in Union Corner

As shown in Figures 2 and 3, Shared Tower investigated various locations within the areas of Union Corner and Brooklyn. These locations were disqualified for reasons such as construction, geotechnical & engineering barriers (hydro access, access road, guyed tower wire placement, size of property lots, etc.), lack of availability of a willing landowner, future property plans of landowner, proximity to the area needing improved coverage, lack of carrier interest and low elevations restricting providers ability to provide high quality services.

Shared Tower is committed to a thorough site selection and placing towers in areas where improved coverage is necessary for consistent and reliable wireless network access. The Subject Site is located in a rural setting away from the majority of residential development and currently used for Agricultural Priority 2 (AR-2) zoning purposes. The Agricultural zoning is beneficial for the proposed tower as it can accommodate for its height and style with minimized impact on its surroundings. Additionally, this tower style and height is consistent with telecommunications infrastructure installed in similar rural areas.

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.

Municipal Land Use By-Laws

Shared Tower was made aware of the West Hants Regional Municipality's Land Use By-Law for telecommunications infrastructure and efforts were made to abide by these local requirements. Section 5.43 of the Land Use By-Law states:

"Section 5.43 "Telecommunications towers shall be permitted in any industrial, resource or agricultural zone subject to the following requirements:

(a) the minimum setback from any lot line for the tower base shall be the greater of:

(i) the minimum yard requirement of the zone for main buildings; or

(ii) the height of the tower plus 25 ft (7.62 m);

(b) the tower base, accessory building and any guy wire anchors shall be enclosed by fencing; and

(c) the lot shall be landscaped to reduce the impact on adjacent uses."

Through Shared Tower's comprehensive site selection process, efforts were made to work with land use authorities and meet setback requirements on the Subject Site, especially to the Northeast Property Line. Following discussion with West Hants Municipal Staff and receiving public input regarding setback requirements, Shared Tower investigates feasible construction options in order to construct the adjusted tower's location and comply with setback requirements from all property lines.

Though these are federally regulated structures, Shared Tower has been committed to working alongside land use authorities and finding a balance between local processes and providing solutions for the existing wireless network issues.

In conclusion, Shared Tower is committed to meaningful consultation and balancing Municipal preferences with the bottom line requirements for the wireless network objectives. Investing in telecommunications is crucial for essential services, especially in rural areas. Infrastructure failures can severely impact these communities during emergencies. Shared Tower acknowledges the significance of the current need for improved coverage, particularly in strengthening emergency response plans, especially in light of the Build Nova Scotia project throughout the province. Shared Tower's objectives align with these needs, and we are committed to working with West Hants to find effective solutions for this ongoing challenge.

We are confident that the telecommunication tower at 19 Highway 236, Newport, NS B0N 2A0 will achieve network objectives and resolve issues of poor coverage and capacity limits experienced by wireless users in this area of West Hants. In addition to this, the Subject Site satisfies local requirements set for telecommunications infrastructure put forth by West Hants' Land Use By-law regarding Telecommunication Infrastructure. We hope that this letter provides further insight into the Site Selection process, and highlights the dedication of our team in seeking out a location that balances both local processes and network requirements.

Should you require more information or further dialogue on the project, please let me know.

Yours truly,

A handwritten signature in black ink, consisting of a large, stylized 'C' followed by a series of loops and a final vertical stroke.

Cheyenne Zierler
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