

# Engagement Summary: Communication Tower and Antenna Protocol

The engagement report for the Communication Tower and Antenna Protocol, spanning from July 10 to July 25, 2024, with a small but concerned group of community members actively participating.

## Participant Demographics

Participant demographics reveal that the project attracted 29 visitors, with 4 individuals actively contributing questions. Among these contributors, all were registered Engage Brant users, and 1 was an unverified user. The contributors represented various communities, including Cainsville, Scotland, and Burford.

## Key Findings

The key findings from the engagement indicate that the community's primary concerns centered around the implications of new tower installations. Specific questions were raised about typical tower heights and the potential impact on existing structures. County of Brant staff responded publicly to these concerns, providing detailed information about tower height regulations. Another significant issue was the public's trust in the federal government's handling of the project, with contributors expressing skepticism about the decision-making process. Feedback was also received regarding the reduction of mail notice requirements for tower installations, and inquiries were made about the timeline for anticipated internet service enhancements resulting from the new towers. In addition to these specific concerns, a few general comments were submitted about the overall project, reflecting broader community interest.

## Online Engagement Metrics

The project recorded a total of 181 visits during the reporting period, with 2 new registrations. Four questions were asked by participants, which were publicly answered by the County, demonstrating a transparent communication approach.

Date of contribution	Q&A Question	Contributor Details	Admin Response Details	
		Login (Screen name)	Response Type	Admin Response
Jul 15 24 10:16:01 pm	What are typical tower heights? How does the new setback requirement compare with surrounding municipalities? Why change this now?	mmn100	Public Answer	Thank you for your questions. In the County of Brant, medium-sized towers between 30 and 60 metres are common for broader coverage in suburban and rural

				<p>areas. Surrounding municipalities, such as the City of Waterloo and Kitchener, generally implement setback policies to prevent tower facilities from being located within 120 meters of sensitive land uses. The County of Brant adopts a similar approach, aligning its protocol with the tower heights and setback guidelines suggested by neighboring municipalities. The main objective of the proposed updates is to streamline the approval process. Since the County does not serve as the approval agency for tower applications, delegating authority to County Staff would enhance efficiency and save time. Also, updating the wording in the protocol will ensure it accurately reflects new technology.</p>
<p>Jul 17 24 12:34:42 pm</p>	<p>Nobody wants this and nobody trusts that the government is saying it's safe.. we have all heard that from them before.</p>	<p>BeeLog</p>		
<p>Jul 17 24 07:25:33 pm</p>	<p>I think reducing the mail notice requirement from 500m to 120m is unjustified. At 120m you are well within the range of casting a shadow on an uniformed property. If this cost is so prohibitive, why not reduce it down to 350m as this will typically</p>	<p>eteraa</p>	<p>Public Answer</p>	<p>The proposed changes to the mail notice radius are based on the consultant's recommendations. Following feedback from the public information session on the proposed setbacks and mail notice radius, County Staff will review the updates and make any necessary adjustments before</p>

	reduce the amount of mailings by 50% while still informing all those within close range.			submitting the final report to the Council for approval. County Staff greatly appreciate your input in this matter.
Jul 24 24 10:38:32 am	When can we anticipate enhancements to internet connectivity within the County of Brant? Numerous areas within the county, including the Six Nations region, are currently experiencing deficiencies in this regard. I am seeking clarification on whether the proposed project will bring about notable enhancements to internet connectivity in these areas.	ColinKorin	Public Answer	Thank you for your feedback. The proposed changes to the County's tower protocol aim to expedite the evaluation process for tower applications and eliminate some of the business case requirements once approved. However, the primary purpose of this protocol is not to influence the number of tower applications received by the County. The intent is to delegate authority to County Staff for issuing concurrence letters and to ensure the protocol accurately reflects new technology.
Jul 25 24 07:42:33 pm	Hello, I don't have a question regarding the County of Brant and the new tower proposals however I do have a comment. The federal and provincial governments push matters to the edge, to the point where you can't even see them caring about humans, it's prevalent and now things are becoming just as prevalent at the municipal level in so many ways. If there is any cause for concern at all, which there is, then our elected officials at the	Papooske	Public Answer	Thank you for your feedback. The County of Brant's tower protocol, similar to those in nearby municipalities like Kitchener and Waterloo, generally discourages the development of new towers within 120 meters of residential neighborhoods and other sensitive land uses. Construction of any new tower closer than 120 meters to these areas may only be accepted if it is demonstrated that no other viable options exist. County staff will ensure that these policies are adhered to early in the

	<p>Municipal levels are our last hope. It should be the people who make these decisions for our neighborhoods and village and the County should be backing us up. There are risks moving towers closer than the already allotted distance so why is moving them closer and doing it behind our backs even a question? Please do not allow this to happen. Along with subdivisions and everything else that I feel just keeps getting shoved down our throats regardless. Everything we're trying to preserve and keep great is in danger.</p>			<p>tower application process. The proposed distance of approximately 1.5 times the tower's height will more accurately reflect the height of the tower while not overriding the general discouragement of towers near sensitive land uses.</p>
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## Engagement Summary: July 25, 2024 Public Information Session on Proposed Changes to the Communication Tower and Antenna Protocol

Name	Comment
Member of the public	I think reducing the mail notice requirement from 500m to 120m is unjustified. At 120m you are well within the range of casting a shadow on an unformed property. If this cost is so prohibitive, why not reduce it down to 350m as this will typically reduce the amount of mailings by 50% while still informing all those within close range?
Colin Korin	When can we anticipate enhancements to internet connectivity within the County of Brant? Numerous areas within the county, including the Six Nations region, are currently experiencing deficiencies in this regard. I am seeking clarification on whether the proposed project will bring about notable enhancements to internet connectivity in these areas.
Member of the public	Hello, I don't have a question regarding the County of Brant and the new tower proposals however I do have a comment. The federal and provincial governments push matters to the edge, to the point where you can't even see them caring about humans, it's prevalent and now things are becoming just as prevalent at the municipal level in so many ways. If there is any cause for concern at all, which there is, then our elected officials at the Municipal level are our last hope. It should be the people who make these decisions for our neighborhoods and village and the County should be backing us up. There are risks in moving towers closer than the already allotted distance so why is moving them closer and doing it behind our backs even a question? Please do not allow this to happen. Along with subdivisions and everything else that I feel just keeps getting shoved down our throats regardless. Everything we're trying to preserve and keep great is in danger.
Brian Bonham	I was expecting a setback that considered health and safety. What is the rationale for reducing the business case requirements? Why is the mailing notice radius involved? With a setback of 1.5 times the tower height, a 20ft tower (a lamppost) could be 30 ft from a residence. Correct? What about property tax? What if reduced?

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**RESPONSE TO DRAFT OF NEW TOWER PROTOCOL –  
from meeting July 17<sup>th</sup>, 2024****1. Background –****B. Objectives**

- 2c Recommend deletion of “institutional Facilities, Parks and Recreation Area”  
Rationale: Institutional Facilities can include Long term Care or Retirement Homes, Schools Daycares, or medical facilities which service vulnerable populations, while parks and recreational facilities are reasonably expected to be vulnerable areas either due to environmental concerns or due to those using them, often children and families
- 3 delete “through use of delegated authority’ Rationale: such decisions most of the time would be too complex to delegate as a yes/no situation. Delegation could be for reviewing the applications, but not writing letters of concurrence/nonconcurrence.

**2. DEFINITIONS**

2. **Institutional Facilities** – Needs to refer to point 8. Sensitive Land Uses
8. **Sensitive Land Uses**....such as noise, EMF, or RFR ....be generated by a new (add phrase or EMF or RFR). Examples include (delete the word ‘may’) but are not limited to (change to include examples ‘Long Term Care or Retirement Homes, and medical buildings as well as examples given)
10. **Communication Tower**
- a needs clarification, does such include hydro poles? We need to add some kind of wording to “exclude any co-location of any sort of exempted tower, installation, mast etc.”
- b New locations on any existing facility – add the phrase “with exception of sensitive building, structures, etc.’
- 13 **Business Case**  
Do not delete points e-h Rationale: Have never heard of a business case that did not address an implementation plan, expected costs, anticipated outcomes, benefits and revenues and above a, risks
- 15 **Delegated Authority**  
Limited to reviewing the application, but not allowed to issue a letter of concurrence or nonconcurrence. Rationale: Director of Development Planning Development Services Division is a non-elected official not answerable to the public in the same way as Councillors and Mayor are supposed to be. Question?? Who is less subject to undue pressure from proponents?

4. **PREFERRED LOCATION GUIDELINES**

- a co-location on an existing tower..... need to include phrase 'excluding colocation on any sort of exempted tower, installation, mast etc'
- b New locations on a existing facility – add phrase 'with exception of sensitive building, structures, etc.'
- c Where the County owns land – ***needs clarification – What type of IT network would the County need to install or enhance. Will the emissions from these IT networks be monitored? By whom?***

**NOTE: If our monitoring shows “very high” emissions, who do we report it to? This question has not been answered since our presentation by S Steedman at the Council meeting. What Department will be responsible?**

**New towers setbacks should be 3 times the height of the tower or 120 meters away from residence, WHICHEVER IS THE HIGHER TOTAL –Who is responsible?**

- e **Locating a NEW Communication tower** -- change to 'regardless of whether needs of the wireless network can be addressed, new towers and or antennas must not be placed in or on excluded facilities as listed above, no matter who owns them' All tower setbacks should be ***3 times the height of the tower or 120 meters which ever is higher*** from any residences, seniors facilities, businesses, daycares, natural heritage systems features, sensitive land uses.

Rationale: it is possible that Agriculture Canada may have a building that could be used for a new tower, but which would make it too close to a sensitive site. ***Such would not be allowed (f&g) setback distances would be 3 times the height or 120 meters whichever is greater***

- f **Monopoles installations** setbacks would be ***3 times the towers height or 120 meters whichever is more*** - from residential dwellings, senior's facilities, schools, daycares, natural heritage systems features, and sensitive land uses where deemed appropriate.
- g **Disguised installations** setbacks would ***be 3 times the height of the tower or 500 meters from the closest residence, schools, daycares, seniors facilities etc. WHICHEVER IS THE HIGHER TOTAL –***

**A General Location Preferences**

- 2 The proponent will be encouraged to use existing.....***Need to add excluding existing towers, masts, etc.'***
- 4 It is preferred.....Public Agency or Authority - ***add phrase (excluding Long Term Care Retirement Homes, schools, daycares or medical facilities)***

**C Site Preferences**

1. A new communication tower....such as an existing communication tower, hydro transmission tower or utility pole is to be explored....  
***Clarification – only if such are not near sensitive or heritage sites***
2. The construction and development...Residential Neighbourhood is generally encouraged (***change to “is required”***)....and other sensitive land uses is generally discouraged and will be accepted only when all.....(***change to uses will not be accepted even when all’***)....and other sensitive land uses shall be restricted to a disguised monopole installation where possible and where appropriate and practical should be designed with future co-location capacity.....change to ....’and other sensitive land uses shall be prohibited until Safety Code 6 has been updated.

**D Design and Landscaping**

- 2 Disguised monopole installation – Delete paragraph as such are not allowed within 120 meters of residential neighbourhood or Natural Heritage System

**6. APPLICATION SUBMISSION REQUIREMENTS**

- e leave in the crossed out section ‘as well as a radius of the leased area boundaries that is equal or greater than three....current tax roll’

8. **LETTER OF UNDERSTANDING** – numbering of points quite muddled up....needs to be tidied up

**9. EXEMPTIONS TO COMMUNICATION TOWER APPLICATION REVIEW**

Notice that this is based on 2007 regulations that took effect in 2008, seem quite outdated.

- e New antenna systems erected by the County of Brant, whose primary function is to support emergency services. ***Comment – If these***



***are exempted then either they must never now or in the future be used for telecommunication, or if are used for such must be situated 120m from residential dwellings, etc. f*** new antenna systems....with a height of less than 15m. **Note:**

***These could pose huge health risks if are within 120m of residential dwellings or other sensitive or natural heritage systems. These potentially could be more dangerous than most of the other taller communication towers or antennas due to proximity***

Towers having a height of less than 40 meters above ground level, should be located 3 times the height of the tower from residential dwellings or 120 meters whichever is more

NOTE: The County should also NOT allow any emergency transmitters on top of antenna systems. Proponent cannot add to the tower without a new application 10. not showing???

## **11. Public Consultation –**

A Exemption to Public Consultation. Public consultation under Section 11B (change to “No Exemptions” ) Timing should be when people reasonably expected to be around ie, not during summer or winter holiday seasons

### **B- Procedure for Public Consultation**

( c ) leave in the deleted section “ as well as a radius of the leased area boundaries that is equal to or greater than three (3) times of the proposed communication tower and communication antenna measured from the base, with such.....

## **12 Resolving Concerns**

Comment: numbering is mixed up should be 1-3 not a,b,c,3,4

Add a new point

‘In cases, where a significant number of local residents, property owners, businesses refuse to accept installation of a communication tower(s) or antenna(s) as manifested by a lawful petitions, protests etc. the installation will not proceed.

It is my thoughts that Safety Code 6 has not been updated since 2015 or so. For the County to amend their code to make it more lax is to go against usual practices and could put them in conflict with an updated Safety Code 6 of the future."

**Summary: (see detailed summary above)**

1. Delegated Authority for issuance of Concurrence/Non-concurrence letters – NO
2. Reduced Setbacks – NO but rather increased to 3 times the height of the tower or 120 meters whichever is greater
3. Reduced Business Case Requirements – Most construction jobs require proof of insurance of the constructor.....towers should come under this umbrella. Leave in items e-f-g-h.
4. Reduce Parking Requirements – no comment
5. Minor Tweaks to Wording – no comment