



Justification Report

For Proposed Telecommunication Antenna Structure

File No. STC0938

**1400 Church St S
Pickering, ON L1W 4C1**

September 30, 2025

Prepared for: The City of Pickering
One The Esplanade
Pickering, ON L1V 6K7

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





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

September 30, 2025

The City of Pickering
One The Esplanade
Pickering, ON L1V 6K7

Re: Proposed Telecommunication Antenna Structure at 1400 Church St S, Pickering, ON L1W 4C1

Shared Tower Inc. (Shared Tower) is pleased to submit this Telecommunication Tower application for a Letter of Concurrence to the Municipality of Pickering.

The proposed tower is a 25 metre streetworks tower structure designed to support multiple co-location opportunities. The tower is proposed to be located at 1400 Church St S, Pickering, ON L1W 4C1, on a E1 - Employment General zoned property.

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 Municipality of Pickering 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,

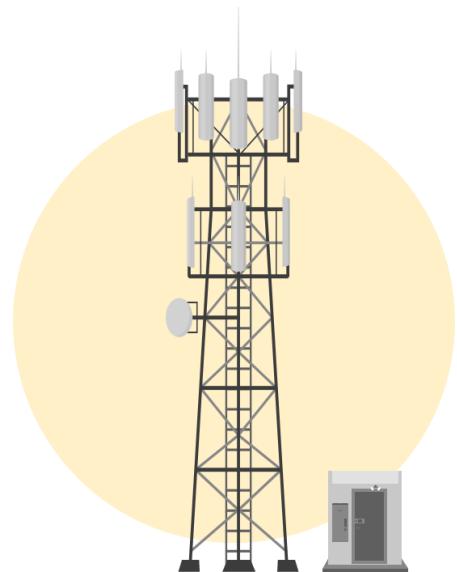
Cheyenne Zierler
Senior Planning Manager
Shared Tower
1300 Cornwall Rd, Unit 101
Oakville, ON L6J 7W5
czierler@sharedtower.ca



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 1400 Church St S, Pickering, ON L1W 4C1 (Subject Site). The subject property is a E1 - Employment General zoned site, approximately 52.61 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.



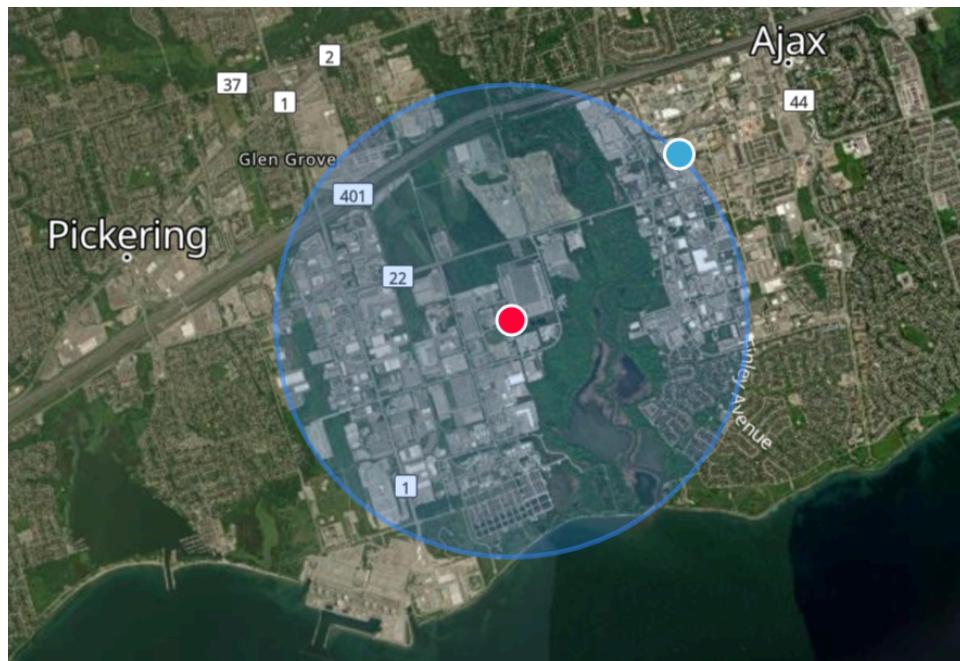
2. Coverage Objective

Broadly, Shared Tower has identified a need for improved telecommunications network coverage in Pickering. The proposed tower is a 25 metre streetworks 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 Municipality of Pickering. At 25 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 1400 Church St S, Pickering, ON L1W 4C1 (legal description: PT LTS 15 & 16, RANGE 3, BROKEN FRONT CONCESSION, PTS 1, 5, 8 & 32 40R22677, S/T EASE IN FAVOUR OF THE CORPORATION OF THE CITY OF PICKERING OVER PT LT 15, RANGE 3, BROKEN FRONT CONCESSION, PTS 5, 8 & 32 40R22677 AS IN DR351022, S/T EASE IN FAVOUR OF THE REGIONAL MUNICIPALITY OF DURHAM, OVER PT LT 15, RANGE 3, BROKEN FRONT CONCESSION, PT 32 40R22677 AS IN DR351127 CITY OF PICKERING).

The proposed location comprises approximately 52.61 acres of land zoned for E1 - Employment General Zone uses allowing for a considerable setback from the majority of residents.

Figure 2: Key Map Showing Subject Site & Viewpoint

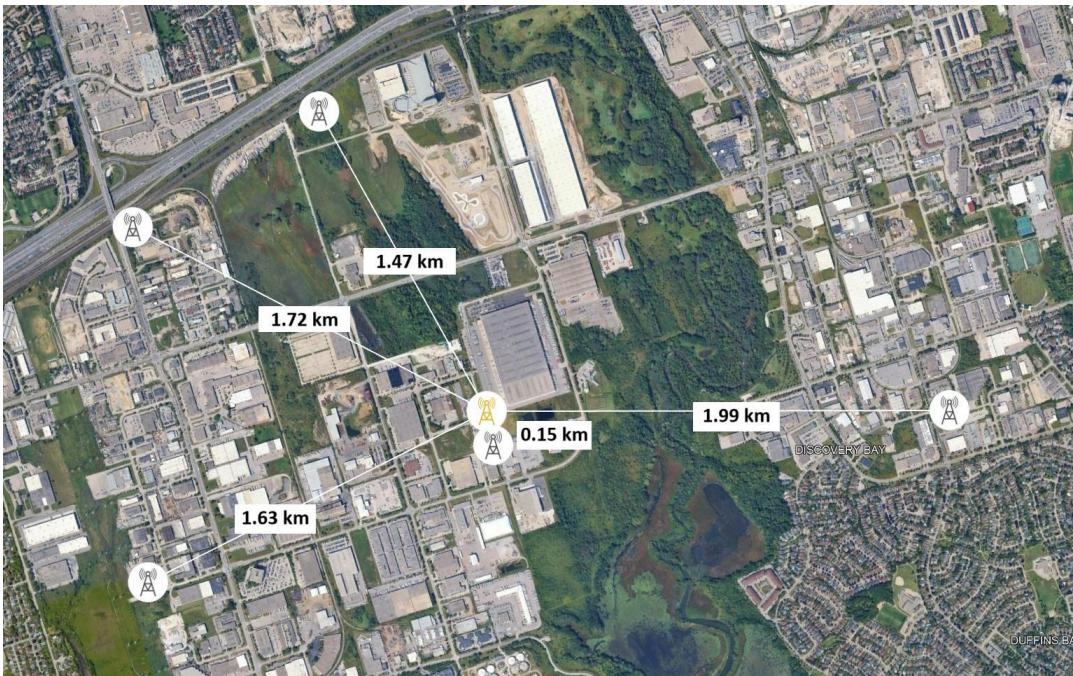


4. Subject Site Selection Justification

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 3, the closest existing tower to the proposed tower is 0.15 km south, our proposed tower is placed at this location in order to ease the burden of the retrospective tower in this commercial area. Additionally, there are towers 1.63 km west, 1.72 km and 1.47 km northwest, and 1.99 km east. The distance from these towers to our proposed towers outlines the need for additional capacity in the area.

Figure 3: 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 zoned property to the Subject Site is located approximately xx metres to the Southeast at address.

Land Use & Public Realm Considerations

The Subject Site is located in a commercial setting away from the majority of residential development and currently used for E1 - Employment General 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.

5. Detailed Rationale

The purpose for this proposal is to improve on coverage that already exists in the area by offloading surrounding towers to increase the strength, quality and capacity of the network by introducing 5G to the area.

Signals degrade the further away a user is from the tower. This is a dense urban area with lots of homes, trees, buildings and people which puts a strain on the network. There is some level of coverage from the other towers in the area, however they broadcast on a range of frequencies that all have different coverage extents.

The communications industry reports that our global/national wireless data consumption continues to grow year after year. Dense areas result in more powerful phones with access to more frequency bands. This heavily affects the network in the area as there are more users streaming videos, attending virtual meetings, and multi-app usage. The carriers add power to optimize their towers as much as they can to keep up with a specific level of service that is acceptable. Once that capacity is reached, other solutions need to be explored; such as this proposed site which offers a minimal visually impacting tower design. This site will aid in shouldering the heavy traffic load in this dense employment area so that existing towers do not fail and get overburdened.

Our proposed site has been carefully chosen to improve wireless coverage in this area of Pickering. There is existing coverage in the area from the carriers, but most of that today is based on 3rd and 4th generation wireless technologies (3G/4G) which brought us HSPA+ and LTE. Carriers have been deploying 5th generation wireless (5G) nationally and that requires more infrastructure like towers so that municipalities and residents can take advantage of it. The difference now is that there are more options and types of towers to choose from to better suit the needs of the community.

The wireless frequencies of 5G will greatly improve data speeds and reduce connection latency which will facilitate new innovations and services. But those special frequencies do not travel long distances so it is essential to get new infrastructure as close to where people live, work, and play. But do it in a manner that respects the environment, and adheres to strict Health Canada safety guidelines. This new tower is not about addressing a 'gap' or void of coverage overall, but to densify existing networks and add new wireless technology. Businesses and residents will expect to have access to this.



6. Proposed Telecommunication Antenna Structure

Shared Tower is proposing to construct a 25 metre streetworks tower on the Subject Site.

Preferred Tower Type

The streetworks 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. This tower type is consistent with the typical structures installed in commercial areas and ensures minimal visual impact.

Preferred Tower Height

The proposed streetworks tower has been designed at a height of 25 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 Pickering and surrounding areas.

Control of Public Access

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

Design Considerations & Screening

The tower structure is proposed to be located on the south-western area of the Subject Site. Trees or other vegetation may be required to be removed or disturbed during the installation or operation of the proposed tower.



7. 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 (2022)

Public Consultation

The City of Pickering has an established process under which this proposed tower application will proceed. The City of Pickering's public consultation process was reviewed to ensure the requirements 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 5th Generation technology.

Impact Assessment Act (IAA 2019)

Shared Tower attests that the proposed tower described in this Letter of Rationale is excluded from environmental assessment under the Impact Assessment Act, formerly known as the Canadian Environmental Assessment Act (CEAA 2012).

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 Municipality of Pickering.



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:

Toronto District Office

175A Admiral Blvd,

Mississauga ON L5T 2T3

Telephone: 1-855-465-6307

Fax: 416-954-3553

Email: spectrumtoronto-spectretoronto@ised-isde.gc.ca

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

8. Conclusion

Shared Tower has proposed a new tower in Pickering 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 Pickering;
- 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 Municipality of Pickering.

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 Municipality of Pickering to continue to build an efficient telecommunications network for the community while ensuring its objectives are met.



Shared Tower

Appendix A: Site Renderings

Before



After





Shared Tower

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