

# Report

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Date	August 20, 2025	File: TAS00006
Subject	Statement of Concurrence for a 35-metre Monopole Telecommunications Antenna Structure on 1750 Mann Street	

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## PURPOSE

To consider a request for a Statement of Concurrence for a proposed 35-metre monopole telecommunications tower on 1750 Mann Street.

## BACKGROUND

1750 Mann Street is a 0.41-hectare (1-acre) parcel zoned as Industrial Light Zone (I1) in [Zoning Bylaw 1997 No. 2950](#) and designated as Industrial and Employment lands in [Official Community Plan No. 3900, 2022](#). The parcel currently contains several buildings used for industrial activities and is not located within the urban containment boundary or within any Development Permit Areas (Attachments 1, 2, and 3).

The parcel is abutted by I1-zoned parcels to the north and south, Rural Zone (A2) parcels to the west, and Industrial Heavy Zone (I2) parcels to the east. The Crofton Substation is located directly northwest of the property.

## Proposal

SLI Towers has submitted a Telecommunications Antenna Structure application for the installation of a 35-metre monopole telecommunications tower on the west side of 1750 Mann Street. Innovation, Science and Economic Development Canada (ISED) has exclusive authority over the placement and approval of federally licensed wireless telecommunication facilities. While municipalities do not have authority over ISED's decision on the location of telecommunications antenna structures (TAS), a local government may issue a Statement of Concurrence or a Statement of Non-concurrence to ISED regarding the siting and design of TAS within its jurisdiction.

Council has been requested to issue a Statement of Concurrence for a proposed monopole telecommunications tower at 1750 Mann Street. The statement should consider the land use compatibility of the TAS, design and location, comments from residents and compliance with the Telecommunication Antenna Structures Council Policy.

The applicant's preliminary tower design, including a site plan indicating the proposed tower location, as well as their letter of rationale, are provided in Attachments 4 and 5.

## DISCUSSION

### Telecommunication Antenna Structures Council Policy

The Telecommunication Antenna Structures Council Policy (Policy) (Attachment 6) establishes the procedural standards for the review and construction of TAS facilities in North Cowichan. Per section 4.13 of the Policy, the role of Council in the application process is to consider, in the form of a resolution, one of the following:

- i. issue an unconditional Statement of Concurrence; or,
- ii. issue a Statement of Concurrence subject to conditions; or,
- iii. issue a Statement of Non-concurrence; or,
- iv. defer the decision, with or without further direction to staff or requests to the Proponent, and request additional time from ISED if the process is likely to take more than 120 days.

#### Public Information Session

The applicant was required to advertise and hold a public information meeting to provide an opportunity for members of the public to comment on the proposed TAS facility. A public notice sign was erected on the property on June 16 (Attachment 7). Notices were sent to all property owners within a 300-metre radius of the subject property on June 9 and scheduled to be delivered on June 16. The electronic public information meeting was advertised in the Cowichan Valley Citizen newspaper on June 18 and June 25. The applicant did not receive any requests for the meeting link to attend the public information meeting on July 2. No public feedback was received following the public information meeting date. A summary of the public consultation process is included in Attachment 8.

#### Siting Policies

The Policy includes several guidelines on the siting and design of TAS facilities:

Section	Policy	Proposed TAS on 1750 Mann Street
5.1	The Proponent should demonstrate effort has been made to locate TAS on existing structures such as other TAS, utility poles, transmission towers and rooftops.	The applicant determined that there were no opportunities for co-locating the infrastructure on an existing tower. The proposed new facility would provide for co-location of multiple carriers and wireless internet providers to improve servicing coverage in the area (Attachment 5).
5.2	Freestanding TAS should be located more than 500m from any parcels zoned with a Residential designation (zones R1 to R7) or Comprehensive Development designation (zones CD1 to CD21).	The proposed TAS is located approximately 177 metres from the nearest residential property, which meets ISEDs regulation of a minimum setback of three times the height of the tower but does not comply with the TAS Council Policy.
5.3	Locations of topographic prominence affecting public views and vistas of important natural or human-made features should be avoided.	The tower would be located across the street from the Crofton Substation and would not block any significant views.

5.4	Locations within or affecting views of heritage site or structures should be avoided unless designed in an unobtrusive and compatible manner.	The tower would be located across the street from the Crofton Substation and would not impact any heritage sites.
5.5	Areas for location should be considered in the following order of priority from encouraged through to discouraged: <ul style="list-style-type: none"> <li>(a) transportation and utility corridors;</li> <li>(b) commercial and industrial sites remote from residential areas;</li> <li>(c) institutional sites, including those that typically require telecommunications technology, such as hospitals, research centres, colleges and public works facilities, but not including schools.</li> <li>(d) agricultural, forested and rural areas;</li> <li>(e) downtown or other commercial areas;</li> <li>(f) parks, greenspaces, golf courses and sports grounds;</li> <li>(g) adjacent to residential areas.</li> </ul>	The tower is proposed to be located on an industrial property that is surrounded by industrial and rural lands on all sides.
5.6	Areas in proximity to lakes, rivers, the shoreline and other water features should be avoided.	The tower is not located within 30 metres of a water feature.
5.7	Design and location should involve minimal or no tree removal. Root protection areas of mature trees should be avoided. Any unavoidable tree removal, including to create space for wildfire protection, must be carried out during the timing window of least risk for nesting birds.	Tree removal is not proposed.

### Design Policies

<b>Section</b>	<b>Policy</b>	<b>Proposed TAS Compliance</b>
5.8	Monopole towers are preferred, subject to the requirements of s.5.9.	A monopole is proposed.
5.9	Each new freestanding structure should be designed to accommodate a minimum of two additional users, taking into account impact on design height.	The proposed facility would provide for co-location of multiple carriers and wireless internet providers to improve servicing coverage in the area.
5.10	The design style of a TAS should be as unobtrusive as possible, avoiding reflective surfaces, and compatible with the surrounding area and adjoining uses. This may include being designed to resemble or include a character feature such as clock tower or flagpole.	The tower will be painted to camouflage with the surrounding vegetation.

5.11	Negative visual impacts must be mitigated as far as possible by methods such as screening, stealth design and landscaping. Cable trays on buildings should be unobtrusive and concealed.	The tower will be screened with existing vegetation and wood board fencing.
5.12	Vegetative screening is encouraged with a preference for a mix of coniferous and deciduous trees to provide year round foliage. Irrigation should be provided where necessary.	Existing trees will be retained surrounding the proposed tower.
5.13	Where a QEP report has been prepared pursuant to s.4.4(g), all recommendations therein must be incorporated into the TAS design wherever technically feasible, including commitment to any post-construction monitoring and actions.	Not applicable.

## ANALYSIS & RATIONALE

The application complies with most of the municipal TAS siting and design policies, excluding Policy 5.2, which states that freestanding TAS should be located more than 500 m from any parcels zoned with a Residential designation (zones R1 to R7) or Comprehensive Development designation (zones CD1 to CD21). Staff support deviation from Policy 5.2 due to the proposed TAS design.

The applicant proposed to construct the TAS on 1750 Mann Street to maximize coverage in the area while minimizing the impact of the facility on residential uses. The tower would be located approximately 177 m away from the nearest residential (R or CD zoned) property and includes visual screening methods such as maintaining vegetation, adding wood board fencing, and painting the tower to camouflage with surrounding trees. The proposed facility aligns with the context of the surrounding neighbourhood, as the parcel is surrounded by rural and both light and heavy industrial uses on all sides. In addition, the subject property is next to the Crofton Substation, which visually aligns with the proposed TAS.

The applicant has met policy requirements for signage, newspaper advertisements, mailed public notification, and a Public Information meeting. No feedback was received from adjacent property owners or the public. Issuance of a Statement of Concurrence in the form of a Council resolution is recommended by staff.

## OPTIONS

1. **(Recommended Option)** THAT Council issues a Statement of Concurrence in support of TAS00006 for the construction of a Telecommunication Antenna Structure on 1750 Mann Street.
2. THAT Council issues a Statement of Non-concurrence for application No. TAS00006.

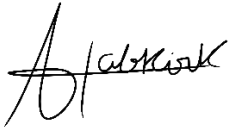
**IMPLICATIONS**

If Council chooses to issue a Statement of Non-concurrence or defer the decision to a future date, installation of the TAS tower may be delayed. ISED may choose to either prohibit or support the installation of the TAS tower on 1750 Mann Street without a Statement of Concurrence from Council. A building permit may be required for the proposed retaining wall.

**RECOMMENDATION**

THAT Council issues a Statement of Concurrence in support of TAS00006 for the construction of a Telecommunication Antenna Structure on 1750 Mann Street.

Report prepared by:



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Amanda Habkirk  
Development Planner

Report reviewed by:



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Amanda Young, RPP, MCIP  
Director, Planning and Building

Report reviewed by:



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George Farkas  
General Manager, Planning,  
Development and Community  
Services

**Approved to be forwarded to Council:**



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Ted Swabey  
Chief Administrative Officer

Attachments:

- (1) Location Map
- (2) Orthophoto
- (3) Zoning Map
- (4) Site Plan
- (5) Letter of Rationale
- (6) Telecommunication Antenna Structures Council Policy
- (7) Public Notice Sign
- (8) Public Consultation Process Summary