



Standing Committee Report Electoral Area Services Committee

To: Electoral Area Services Committee
From: Director of Development & Engineering Services
Date: June 5, 2025

Subject: Antenna Systems Siting Consultation Policy

Objective: To review a proposed Antenna Systems Siting Consultation Board Policy and consider forwarding it to the Regional Board for approval.

Discussion:

Background

The telecommunications industry is regulated by the federal government through the Radiocommunication Act, which is primarily administered by Innovation, Science and Economic Development (ISED) Canada. For telecommunications to function, antenna towers, referred to as antenna systems by ISED, are required to provide telecommunications services to businesses, institutions, and the public. As telecommunications systems are regulated by the federal government, they are therefore not subject to municipal zoning bylaws or Official Community Plans. However, ISED considers the local government to have the best knowledge of land uses in an area. Therefore, ISED encourages the development of policies and/or protocols by the local government to ensure that a clear process is established for the consideration of new telecommunications facilities within the community. In response, staff have developed a proposed Antenna Systems Policy (Attachment #2) that is harmonized with ISED Canada's *Radiocommunication and Broadcasting Antenna Systems Client Procedures Circular* (CPC-2-0-03). The proposed policy is being presented to the Electoral Area Services Committee for review to consider forwarding to the Regional Board for approval.

The proposed Antenna Systems Policy outlines preferences that reflect the unique geography of the Central Okanagan, provides an improved notification radius that will encapsulate more residents compared to the default ISED policy, and requires proponents to address any relevant concerns of the residents within the notification radius. Additionally, the proposed policy would allow for the implementation of antenna systems in a more efficient and timely manner for applications that adhere to the policy's guidelines. This would assist in providing opportunities for telecommunication services in more remote areas of the electoral areas, where residents receive telecommunication services below the national average.

If the Regional Board ultimately approves the proposed Antenna Systems Siting and Consultation Policy, the proponent would need to receive a letter of concurrence from the RDCO that the proposal complies with the policy, before ISED Canada issues an approval for the antenna system. While the RDCO is not the approving authority for antenna systems, the RDCO's role would be to issue a statement of concurrence or non-concurrence to the proponent and to ISED. The statement would need to consider RDCO design and location preferences, comments from residents, and the proponent's adherence to the proposed RDCO Antenna Systems Siting Consultation Policy.

Limits to Municipal Authority and Regulation

Federal Jurisdiction

In Canada, the federal Minister of Innovation, Science and Economic Development (“ISED”) has the authority under the *Radiocommunication Act* to approve antenna system installations. The final decision to authorize antenna systems is held solely by ISED. Municipalities do not possess the authority to override ISED’s decision in this regard. The process that must be followed by proponents seeking to install or modify antenna systems is outlined in ISED’s Client Procedures Circular *CPC-2-0-03 Radiocommunication and Broadcasting Antenna Systems*.

Health and Safety Requirements

Health concerns relating to radiofrequency, energy, and safety fall under the national jurisdiction of Health Canada. Local governments possess no authority to regulate health and safety requirements related to antenna systems. Health Canada requires that all antenna system installations comply with all existing safety regulations which determines exposure limits on the amount of radio frequency energy that can be present in publicly accessible areas. This means that proponents must comply with the regulatory requirements and process established in *CPC-2-0-03* before an installation is approved. Once antenna systems are installed, operators must ensure that their installations comply with the Canadian exposure limits as a condition of their licence.

Antenna Systems Siting

The final decision to approve the location of antenna systems is made only by ISED. However, ISED considers public consultation important to their approval process, and believes that local governments have the best understanding of local preferences. Therefore, ISED requires proponents to receive a letter of concurrence from local governments before they approve an antenna system. ISED encourages local governments to develop policies that establish development guidelines for antenna systems and an accompanying community consultation process. Therefore, the role of the RDCO is to issue a statement of concurrence or non-concurrence to the proponent and to ISED. The statement considers the land use compatibility of each antenna system proposal, RDCO design and location preferences, comments from residents, and the proponent’s adherence to the RDCO policy.

Proposed Antenna Systems Siting Consultation Policy

Purpose

The purpose of this policy is to establish procedural standards that will allow the region to effectively participate in and influence the placement of antenna systems proposed within the Electoral Areas. The policy is intended to assist the Regional Board, staff, representatives of the telecommunications industry, and members of the public in being aware of and understanding the implementation methods, processes, procedures, and criteria required to receive a letter of concurrence.

Policy Development

To assist municipalities with developing local processes, ISED published a guide for developing antenna systems siting policies and/or protocols. The Federation of Canadian Municipalities and the Canadian Wireless Telecommunications Association jointly developed an antenna system siting protocol template for Canadian municipalities to establish protocols that guide the antenna system siting process. Staff have developed the proposed policy in alignment with the guide from ISED and the template from the Federation of Canadian Municipalities and the Canadian Wireless Telecommunications Association.

Rationale for Consultation Radius

Where a local government does not have an antenna systems policy, ISED requires that proponents follow ISED's default consultation process outlined in *CPC-2-0-03*. The default public consultation process lacks design and location guidelines that are contextual to the uniqueness of the Central Okanagan. Additionally, the default notification radius in which proponents are to mail letters to residents informing them of a proposed antenna system lacks the distance required for meaningful public consultation within the Central Okanagan context. The default notification radius is a radius of 3x the height of the tower extending from the base of the tower. As parcel area size tends to be large in the Electoral Areas, the default notification radius results in only a few residents being informed of an antenna system being proposed near their property.

Exclusions from the policy

ISED allows for certain antenna proposals to be exempt from all land-use authority and public consultation requirements. The criteria for exemption are:

- New antenna systems where the height is less than 15 metres above ground level. This exclusion does not apply to antenna systems proposed by telecommunication carriers, broadcasting undertakings, or third-party tower owners.
- Existing antenna systems where modifications are made, antennas added or the tower replaced, including to facilitate sharing, provided that the total cumulative height increase is no greater than 25% of the height of the initial antenna system installation.
- Non-tower structures, including antennas on buildings, water towers, lamp posts, etc. These may be excluded from consultation provided that the height above the non-tower structure is not increased by more than 25%.
- Temporary antenna systems used for special events or emergency operations. Temporary antenna systems must be removed within three months after the start of the emergency or special event.

Although proponents are not required to contact the local government if they meet the exclusion criteria, they are asked to inform the RDCO so that Planning Services can direct future proponents to possible areas of co-location.

Benefits of the Proposed Policy

The proposed antenna systems policy would enable effective participation and cooperation between proponents, the Regional District, and local residents. The proposed policy outlines general preferences that reflect the unique geography of the Central Okanagan but also provides an improved notification radius that will encapsulate more residents than the default ISED policy. Understanding that every community is unique within the Electoral Areas, the policy would require that proponents address any relevant concerns of the residents within the notification radius.

The policy would also allow for the implementation of antenna systems in an efficient and timely manner for applications that adhere to the policy's guidelines. Therefore, the policy would streamline the application process of antenna systems for the proponent and facilitate the efficient placement of antenna systems that integrate local context. This would assist in providing telecommunication services in more remote areas, where residents receive telecommunication services below the national average.

Referral Comments

Planning Advisory Committee

Supported the policy.

Westbank First Nation

Approved policy with the following condition:

Westbank First Nation requires each location/project be submitted individually to WFN to allow for a satisfactory review of the potential impacts on the environment, wildlife and asserted Title & Rights.

Okanagan Indian Band

Draft policy has been circulated and referral comments are pending.

RDCO Parks Services

Supports the policy and acknowledges that the default ISED notification radius is insufficient.

Next Steps:

Should the Electoral Area Services Committee support the proposed policy, staff will forward the policy to the Regional Board, for approval.

Recommendation(s):

THAT the Electoral Area Services Committee recommends that the Regional Board approve BP24-2025, Antenna Systems Siting Consultation Policy, as outlined in the Report from the Director of Development & Engineering dated June 5, 2025.

Respectfully submitted by: Thor Goodman, Planner I

Report Approved by: Danielle Noble-Brandt, Director of Development & Engineering Services

Approved for Agenda: Sally Ginter, Chief Administrative Officer

Attachment(s): 1. BP24-2025 Antenna Systems Siting Consultation Policy (DRAFT)
 2. Antenna Systems Policy – Presentation
