



# **MEETING OF THE MUNICIPAL PLANNING TRIBUNAL (MPT)**

## **A G E N D A**

<b>DATE:</b>	<b>25 JUNE 2026</b>
<b>VENUE:</b>	<b>TOWN PLANNING COMMITTEE ROOM</b>
<b>TIME:</b>	<b>14:00</b>

# OVERSTRAND MUNICIPALITY

Office of the Chairperson: MPT  
Civic Centre  
HERMANUS  
7200

**18 June 2026**

**TO : THE MEMBERS OF THE MUNICIPAL PLANNING TRIBUNAL**

**CONVENING NOTICE : SESSION OF THE MUNICIPAL PLANNING TRIBUNAL (MPT)**

**NOTICE IS HEREBY GIVEN** that the **Municipal Planning Tribunal (MPT)** will go into session in the Town Planning Committee Room on **Thursday, 25 June 2026** at **14:00** to consider the attached agenda.

**S MULLER**  
**CHAIRPERSON : MUNICIPAL PLANNING TRIBUNAL**

**Distribution:**

1. Mr S Müller (Chairperson)
2. Ms T de Waal (Vice-Chairperson)
3. Mr H Blignaut (Member)
4. Ms R Louw (Member)
5. Mr R Kuchar (Authorised Official)
6. Mr S van der Merwe (Principal Town Planner)
7. Ms H van der Stoep (Principal Town Planner)
8. Mr H Olivier (Town Planner)
9. Mr B Minnaar (Town Planner)
10. Secretariat

# MUNICIPAL PLANNING TRIBUNAL (MPT)

25 June 2026

## I N D E X

**ITEM**

**PAGE  
NUMBER**

**APPLICATIONS FOR LEAVE OF ABSENCE**

- |            |   |           |
|------------|---|-----------|
| <b>4.1</b> | <b>ERF 219 (A PORTION OF ERF 316), 63 LUSIBA STREET, ZWELIHLE, OVERSTRAND MUNICIPAL AREA: APPLICATION FOR CONSENT USE AND DEPARTURE: WARREN PATTERSON PLANNING ON BEHALF OF OVERSTRAND MUNICIPALITY</b>   | <b>1</b>  |
| <b>4.2</b> | <b>ERF 3624, 5 VAN BLOMMENSTEIN STREET, ONRUSTRIVIER AND ERF 3625, 7 VAN BLOMMENSTEIN STREET, ONRUSTRIVIER, OVERSTRAND MUNICIPAL AREA: APPLICATION FOR REZONING, DEPARTURE AND EXEMPTION OF SUBDIVISION (RIGHT OF WAY SERVITUDE): PLAN ACTIVE TOWN &amp; REGIONAL PLANNERS ON BEHALF OF QUENET'S PHARMACY (BOLAND) (PTY) LTD &amp; MOTIFPROPS 157 (PTY) LTD</b> | <b>64</b> |

- 1. OPENING**
- 2. APPLICATIONS FOR LEAVE OF ABSENCE**
- 3. CONFIRMATION OF MINUTES**
  - 3.1 Minutes of a Municipal Planning Tribunal Meeting held on 28 May 2026**
- 4. ITEMS FOR CONSIDERATION**
  - 4.1 ERF 219 (A PORTION OF ERF 316), 63 LUSIBA STREET, ZWELIHLE, OVERSTRAND MUNICIPAL AREA: APPLICATION FOR CONSENT USE AND DEPARTURE: WARREN PATTERSON PLANNING ON BEHALF OF OVERSTRAND MUNICIPALITY**

Report attached
  - 4.2 ERF 3624, 5 VAN BLOMMENSTEIN STREET, ONRUSTRIVIER AND ERF 3625, 7 VAN BLOMMENSTEIN STREET, ONRUSTRIVIER, OVERSTRAND MUNICIPAL AREA: APPLICATION FOR REZONING, DEPARTURE AND EXEMPTION OF SUBDIVISION (RIGHT OF WAY SERVITUDE): PLAN ACTIVE TOWN & REGIONAL PLANNERS ON BEHALF OF QUENET'S PHARMACY (BOLAND) (PTY) LTD & MOTIFPROPS 157 (PTY) LTD**

Report attached

## 4.1

**ERF 219 (A PORTION OF ERF 316), 63 LUSIBA STREET, ZWELIHLE, OVERSTRAND MUNICIPAL AREA: APPLICATION FOR CONSENT USE AND DEPARTURE: WARREN PATTERSON PLANNING ON BEHALF OF OVERSTRAND MUNICIPALITY**

219 HZW (4881/2024)

B Minnaar  
7 May 2026

(028) 313 8900

Hermanus Administration

**1. EXECUTIVE SUMMARY**

An application was received on 4 December 2024 from Warren Patterson Planning on behalf of Overstrand Municipality applicable to Erf 219, Zwelihle in terms of the Overstrand Municipality Amendment By-Law on Municipal Land Use Planning, 2020 for the following:

- ❖ **Consent Use** in terms of Section 16(2)(o) of the Overstrand Municipality Amendment By-Law on Municipal Land Use Planning, 2020 to allow the development of a telecommunication base station with a 25m high lattice mast.
- ❖ **Departures** in terms of Section 16(2)(b) of the Overstrand Municipality Amendment By-Law on Municipal Land Use Planning, 2020 to accommodate the proposed 25m high lattice mast on the property as follows:
  - to relax the western street building from 5m to 0m;
  - to relax the maximum permitted boundary wall height from 2.1m to 3.5m, and
  - to relax the height restriction from 10m to 25m.

The Locality Plan of the property concerned is attached as Annexure A. The Motivation Report from the applicant in support of the application is attached as Annexure B and the Site Development Plan is attached as Annexure C.

**2. DECISION AUTHORITY**

Municipal Planning Tribunal

**3. BACKGROUND / SITE HISTORY**

Erf 219, Zwelihle is situated at 63 Lusiba Street. The property is zoned Community Zone 1: Community Facilities and is 9603m<sup>2</sup> in extent. The property currently consists of a Primary School with associated buildings.

The intent of the property owner is to construct a 25m high monopole tower on the property to both improve the telecommunication signal and capacity needs.

The application therefore entails a consent use and departure application to accommodate the above proposal.

**4. SUMMARY OF APPLICANT'S MOTIVATION**

THE MOTIVATION FOR THE APPLICATION IS SUMMARISED AS FOLLOWS:

**PROPERTY DESCRIPTION:**

- ❖ The subject property relating to the application is identified as Erf 219, Zwelihle with an extent of 9603m<sup>2</sup>.
- ❖ The property is situated in Zwelihle 63 Lusiba Street and is currently owned by the Overstrand Municipality. Although the ownership on GIS Viewer indicates Provincial Department of Transport & Public Works, the property was never transferred/registered in their name. Therefore, the ownership remains in the name of Overstrand Municipality.
- ❖ There are no restrictive title deed conditions as pertained in the Title Deed T10034/95.

**DEVELOPMENT PROPOSAL:****❖ Development**

It is the intention of our client to apply for a consent use, departure of the western street building line and the height restriction for Community Zone 1 property to construct a freestanding telecommunication base station.

The development concept:

- A 25m Lattice Tower (Transmission apparatus),
- 12 x antennas attached to the Tower,
- Microwave dishes attached to the tower,
- 1 x Equipment container with space for four service providers, which will be locked at all times, and
- A 3m high wall with 0.5m palisade fence on top (high security site).

The total area of the TA will be 44m<sup>2</sup>. The main purpose of the proposed transmission apparatus is to improve the network coverage (LTE services) for the various service providers (MTN, Vodacom, Rain and Telkom Mobile). The transmission apparatus furthermore connects to the surrounding existing network, including Onrustrivier, Sandbaai and Hermanus, which reduces loss of reception areas (dead zones) when leaving the coverage radius of an existing TA.

**❖ Consent use**

A transmission apparatus is permitted as a consent use on a Community Zone 1 property. Accordingly, no rezoning is required in order to accommodate the proposed transmission apparatus. The use of the transmission apparatus will not interfere with the primary use of the property, being a place of instruction, as the area of the transmission apparatus only extends 44m<sup>2</sup> and will be located on a portion of the property that is not easily accessible to students attending the school.

**❖ Height Restriction**

According to the Overstrand Municipality's zoning scheme, properties zoned as 'Community Zone 1', have a height restriction of 10.5m. A 25m tower is proposed in this application, thus a permanent departure is applied for in terms of Section 16(2)(b) Overstrand Municipality By-law on Municipal Land Use Planning, 2020 to allow for the erection of a 25m tower.

The height restriction will subsequently be relaxed from 10.5m to 25m for the purpose of erecting a 25m tower on the subject property. The 25m height is required in order to accommodate more service providers at one location and to provide coverage to a larger area. The aim is to limit the proliferation of masts in the area.

According to Chapter 16 of the Overstrand Municipality Land Use Scheme, 2020 the height of boundary walls are limited to 2.1m. Considering the sense of place of the surrounding area it is considered to be a high-risk area. This results in the need to improve the security measures of the proposed TA in order to minimise theft and vandalism. A 3m high wall with 500mm palisade fence on top is therefore proposed in order to ensure the safety of the mast and equipment.

Accordingly, a permanent departure is applied for in terms of Section 16(2)(b) Overstrand Municipality By-law on Municipal Land Use Planning, 2020 to allow for the proposed 3.5m boundary wall in lieu of the permitted 2.1m height.

❖ **Utility Services**

Electricity for the TA will be obtained from the available on-site electrical supply to the property.

Access to the proposed TA will be obtained via the main access gate to the property, situated along Lusiba Street. Only pedestrian access will be available for access to the TA. The route for pedestrian access will be along the northern boundary of the property behind the buildings.

For construction purposes (30 days), temporary access will however be required from Hlobo Street as the equipment and mast associated with the TA cannot be transported to the proposed location via the main access gate of the school due to space constraints.

The proposed use will have no impact on the external engineering services, on transport or traffic related considerations, or on the biophysical environment.

❖ **Environmental Regulations**

An application was lodged with the Department of Environmental Affairs and Development Planning (attached as Annexure G) confirming that environmental authorization is not required.

❖ **Overstrand Land Use Scheme, 2020 requirements**

In terms of Chapter 16.10.23, applications for the installation of Transmission Apparatus (TA) shall, to the satisfaction of the Municipality, incorporate the following:

- (a) Site Development Plan which clearly illustrates the proposal in the context of the existing landscape and receiving environment, with reference to application guidelines as may be incorporated in the application form;

Please refer to sheet 2 of 5 of the drawings dated 07-11-2024, Revision 1.

- (b) Telecommunication Apparatus Infrastructure Plan (indicating but not limited to the following, namely dimensioned plans showing detail of TA, graphic illustration of the proposed facility, elevation details, proposed materials and colours, screening or fencing)

Please refer to sheet 3 of 5 of the drawings dated 07-11-2024, Revision 1. Please also refer to Figures 14 to 19 indicating what the tower is expected to look like.

- (c) Site Development Plan & Telecommunication Apparatus Infrastructure Plan to be accompanied by a report detailing the motivation for the selected site, how the siting and design of the facility responds to the SDP;

Please refer to Section D.2.2 of the motivation report.

- (d) Motivation report to be accompanied by relevant proof pertaining to need and desirability (demand & technical requirements);

Please refer to Section D.2.1 of the motivation report.

- (e) Application to satisfactorily demonstrate to the AO / MPT that all alternatives to the site itself have been explored within a 1km radius of the subject property;

Please refer to Section D.2.3 of the motivation report.

- (f) Minimum of two alternative sites and design options to be considered;

Please refer to Sections D.2.3 and D.2.4 of the motivation report.

- (g) Zoning and land use map to accompany application, that shall also indicate all areas of heritage or environmental significance, if applicable;

Please refer to Figures 6, 7, 9 and 10.

- (h) Visual Impact Assessment prepared by a suitably qualified professional, if required by the municipality, that shall incorporate mitigation measures limiting visual impact;

A Visual Impact Assessment was conducted in November 2024 by ARLA Consulting Landscape Architects.

- (i) Statement demonstrating that the installation complies with the applicable health and safety standards.

Refer to Annexure H.

❖ **SDF**

This application is in line with the spatial development principles as set out in the Overstrand SDF, 2020, as it strives to improve urban efficiency, and align planned growth with infrastructure. As a result, connectivity is enhanced on local, national and international level as stipulated in the SDF, 2020.

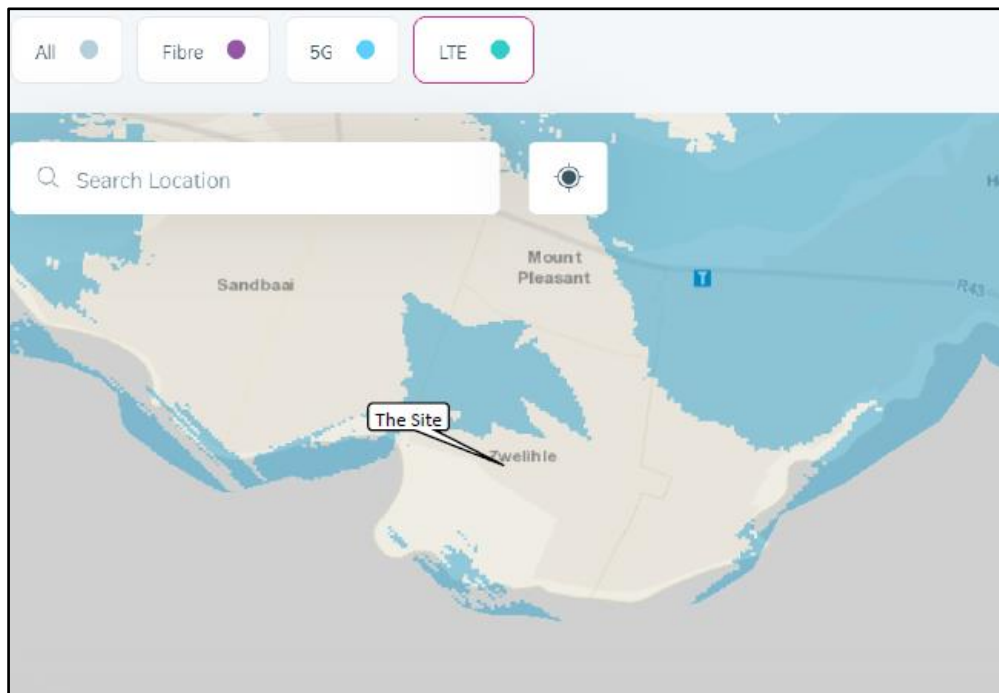
This is supported by the IDP 2022-2027 indicating on page 34 that Zwelihle has the largest population in Hermanus totalling 25098 residents according to the 2022 projection.

With an increase in population, there is a need to provide adequate coverage to consumers, especially taking into account that each consumer have on average 3-5 devices which could benefit from increased coverage.

#### ❖ **Need and Desirability**

In a modern-day society, the dependency on communicative technology becomes increasingly higher. This is due to the society's utilisation of more mobile devices and more than one device per household which mainly relies on internet connectivity (e.g. smartphones, portable computers, tablets/iPads etc.). These devices are used for multiple purposes including socialisation, business related uses and accessibility to important emergency services. Due to factors including densification, urbanisation and influx of seasonal guests especially over festive seasons and holidays, in a tourist attractive place like Overstrand, poor network coverage (related to both voice and data) is often experienced. SBA Towers South Africa identified several positions in the area that need to be equipped with transmission apparatus to alleviate the pressure and to cater for the ever-increasing demand.

#### Existing Service Provider Coverage Maps



Telkom Coverage Map



## ❖ Site Location



	Tower & Height	Site Location	Distance	Lack of Sufficiency
<b>A</b>	Monopole Tower, 25m	Sisulu Street	±755m	Failure to provide for the necessary coverage necessity due to distance away from proposed tower. There is a very high population density in close proximity to this site, which significantly reduces its coverage area.
<b>B</b>	Lattice Tower, 25m	Steenbras Road	±1225m	Failure to provide for the necessary coverage necessity due to distance away from proposed tower. MTN is already on this tower and confirmed interest in the proposed tower on Erf 316 as well.

## ❖ Alternative Sites

Alternative sites were considered during the initial stages of the proposal, but this option is deemed the most acceptable option in terms of visual impact and based on the requirements of the network providers, contractors and landowner.

**Alternative sites considered in surrounding area:**

- Option 1:** The property owner was approached some time ago already and they confirmed that they are not interested to accommodate the proposed TA.
- Option 2:** The church was approached and indicated that they are not interested based on negative feedback from the nearby community.
- Option 3:** The property was approached and a proposal was sent, but due to space constraints the proposal was not proceeded with.
- Option 4:** The building that was on this property was demolished at some stage, but the property owner could not be located to pursue this option.



❖ **Alternative positions on Erf 219, Zwelihle**

- Option A:** This position was considered at some stage but would result in the removal of the main garden area of the school which would not be ideal. This will also be at the entrance point of the school which is not preferred.
- Option B:** This position is considered to have the least impact on the activities on the property. There are also no underground services.
- Option C:** It was found that there are underground services at this location which would be impacted by the proposed TA.



#### ❖ Visual Impact

The proposed TA will create an opportunity for other service providers to co-locate, as other structures of this height do not exist in this area.

A Visual Impact Assessment was conducted in November 2024 by Arla Consulting Landscape Architects for the proposed TA on Erf 219, Zwelihle. The VIA stated that the visual impact will be minimal (The VIA is provided as part of this application):

*The level of assessment is determined by the type of environment (in this case areas or routes of moderate scenic, cultural, or historical significance) and the type of development (in this case a Category 2 development i.e. small-scale infrastructure).*

According to the above, minimal visual impact is expected and thus a Level 2 VIA, namely:

- Potentially low level of intrusion on landscapes or scenic resources.
- Limited change in the visual character of the area.
- Low-key development, similar in nature to existing development.

The landscape character of the area within which the site is located can be described as an informal settlement with 30m high mast lighting spaced approximately 150m apart.

The VIA also states that a lattice mast is the preferred type of mast. The original proposal was for a 25m monopole mast.

Proposed mitigation measures include:

- The use of muted, matt finishes for all parts of the proposed development / infrastructure to be used whenever possible.
- Fencing should preferably be visually permeable (i.e. no solid walls), however, due to the tower's location (within a high vandal and theft area), it is acknowledged that solid walls will be required to secure the infrastructure.
- Preferably no lights, including along the infrastructure fence line, should be installed with the proposed infrastructure.

❖ **Conclusion**

This consent use and permanent departure application in terms of the zoning scheme for a proposed TA on Erf 219, Zwelihle, will provide an essential and sought after service to the surrounding community, businesses and commuters. This application is in line with the current policy and legislation on a local level. Policy and legislation are mainly focused on the Spatial Planning and Land Use Management Act, 2013. Furthermore, this application is in compliance with the Integrated Development Plan (2022–2027), and Spatial Development Framework (MSDF), 2020.

We trust that this application will meet your requirements and will receive your positive consideration.

❖ **SPLUMA Principles**

SPLUMA principles will be discussed in 10.2 of this report.

**5. ADMINISTRATIVE COMPLIANCE**

Methods of advertising		Date published	Closing date for comments
Local Newspaper	Yes	21 August 2025	26 September 2025
Registered mail / E-mail notices / SMS / site notices	Yes	21 August 2025	26 September 2025
Internal Departments	Yes	21 August 2025	26 September 2025
Ward councillor	Yes	21 August 2025	26 September 2025
Total comments	<b>NONE</b>		
Total letters of support	<b>ONE (1)</b>		
Was public participation undertaken in accordance with Section 46 - 50 of the By-Law on Municipal Land Use Planning?			<b>Yes</b>
Was the application processed correctly?			<b>Yes</b>
Is the proposal consistent with the principles referred to in Chapter 2 of SPLUMA and Chapter VI of LUPA?			<b>Yes</b>

## 6. SUMMARY OF COMMENTS FROM ORGANS OF STATE AND/OR MUNICIPAL DEPARTMENTS

Name	Date received	Summary of comments
Building Department	26/08/2025	No objection: All buildings to comply with NBR and all other applicable law.
Fire Department	26/08/2025	The fire department has no objection subject to compliance with the provision of SANS 10400-T:2024, SANS 10400-A and the By-Law relating fire safety.
District Health	12/09/2025	No objection.
Services Report	05/09/2025	Annexure D.
Openserve (Telkom)	08/09/2025	Annexure E.

## 7. SUMMARY OF COMMENTS RECEIVED DURING PUBLIC PARTICIPATION

Registered letters / e-mails / SMS were sent to interested and affected parties, advertisements published in the Village News (local newspaper) and a site notice invited the public to comment on the application during public participation.

One (1) letter of support was submitted (attached as Annexure F), and no negative comments were received from the public and no negative comments were received by the internal and external departments.

### Letter of Support:

*"I, the owner of Erf 221 Manzi Street Zwelihle, have no objection to the proposal".*

### **TOWN PLANNER'S RESPONSE:**

The letter of support is noted, however there is an existing approval for a transmission apparatus located on Erf 188, Zwelihle. The subject property is located across from Erf 188, Zwelihle therefore the application to accommodate another tower in close proximity is not supported.

## 8. SUMMARY OF APPLICANT'S REPLY TO COMMENTS

N/A

## 9. MUNICIPAL ASSESSMENT OF COMMENTS

N/A

## 10. MUNICIPAL PLANNING EVALUATION (REFER TO RELEVANT CONSIDERATIONS GUIDELINE)

### 10.1 Background

N/A

**10.2 (In)consistency with the Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013)**

The application can be motivated in terms of the principles in the following manner:

**Spatial Justice**

The principle of spatial justice is not applicable to this application.

**Spatial sustainability**

The application does not negatively impact on the environmental element, nor does it negatively impact on the protected natural environment.

**Efficiency**

The application to accommodate a telecommunications tower on the subject property will not improve transmission services signal since there is an existing approval for a telecommunication tower on Erf 188, Zwelihle which is located across the street (Kepkey Street). Therefore, the services proposed will not be efficient.

**Spatial Resilience**

Erf 188, Zwelihle is located across the road (Kepkey Street) from the subject property which already has approval for a telecommunication tower. The proposal to accommodate another transmission tower in close proximity to one another will not be supported by the principle of spatial resilience.

**Good administration**

The application followed the required planning procedures to ensure that land use activity is in line with municipal By-Laws and a public participation process had been followed.

**10.3 (In)consistency with the principles referred to in Chapter VI of the Land Use Planning Act, 2014 (Act 3 of 2014)**

Same as 10.2 above.

**10.4 (In)consistency with the IDP/Various levels of SDF's/Applicable policies**

The application is consistent with the SDF and the OMGMS.

**10.5 (In)consistency with guidelines prepared by the Provincial Minister**

N/A

**10.6 Impact on municipal engineering services**

The proposed development is situated on an already serviced site, and no additional services are required, see attached comment from Engineering Services Department (Annexure D). However, the telecommunication tower proposed will not be beneficial since there is already an existing telecommunication tower approval on Erf 188, Zwelihle which is located across the road (Kepkey Street).

**10.7 Outcomes of investigations/applications i.t.o. other legislation**

The National Environmental Management Act (Act 107 of 1998) regulates environmental and social sustainability. According to the National Environmental Management Act Regulations Listing Notice 3 of 2014, which came into effect on 08 December 2014, an Environmental Impact Assessment (EIA) or Record of Decision (ROD) is only a requirement for:

*“The development of masts or towers of any material or type used for telecommunication broadcasting or radio transmission purposes where the mast or tower outside the urban edge-*

- a) is to be placed on a site not previously used for this purpose; and*
- b) will exceed 15 meters in height*

*But excluding attachments to existing buildings and masts on rooftops”.*

Listing Notice 3 of 2014 clearly defines the requirements in the Western Cape:

*“(f) In Western Cape:*

- I. All areas outside urban areas; or*
- II. Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority, or zoned for a conservation purpose, within urban areas.*

The site falls within the urban area of the Overstrand Municipal jurisdiction and does not fall part of the conservation worthy area as indicated in the SDF. Therefore, the application for the telecommunication tower does not trigger a listed activity in terms of the 2014 NEMA regulations. However, the proposal is not supported since the application is located in close proximity of an already approved telecommunication tower.

**10.8 Existing and proposed zoning comparisons and considerations**

The subject site consists of a church which is compliant with the applicable Community 1 zoning.

Furthermore, the proposal to accommodate a telecommunication tower on the subject site requires a consent use in order to be in line with the land use rights permitted in terms of the applicable zoning.

**In addition, to accommodate the structure certain building parameter departures have been applied for:**

- to relax the western street building from 5m to 0m;
- to relax the maximum permitted boundary wall height from 2.1m to 3.5m, and
- to relax the height restriction from 10m to 25m.

Application has therefore been made for a consent use and departures.

**11. ADDITIONAL PLANNING EVALUATION FOR REMOVAL OF RESTRICTIONS**

N/A

## 12. THE DESIRABILITY OF THE PROPOSAL

The proposed transmission tower will be a lattice mast with a height of 25m from base level to be located along the 0m boundary line Hlobo Avenue.

It must be noted that Erf 188, Zwelihle was recently (24 November 2025) approved to accommodate a 25m telecommunication tower which will already improve the signal and capacity needs of the community. Erf 188, Zwelihle is located across the street (Kepkey Street) from the subject property. Therefore, to accommodate another telecommunication tower in close proximity being  $\pm 75m$  from one another is not considered as desirable since the approved telecommunication tower will already mitigate the need for signal strength and capacity needs of the community.

### CONCLUSION

With regards to the aforementioned, it is considered that the proposal to accommodate another telecommunication tower in close proximity to another telecommunication tower is not considered desirable

## 13. RECOMMENDATION

1. that the application in terms of Section 16(2)(o) of the Overstrand Municipality Amendment By-Law on Municipal Land Use Planning, 2020 on Erf 219, Zwelihle to allow the development of a telecommunication base station with a 25m high monopole mast on the subject property, **not be approved** in terms of the provisions of Section 61 of the By-Law.
2. that the application in terms of Section 16(2)(b) of the Overstrand Municipality Amendment By-Law on Municipal Land Use Planning, 2020 on Erf 219, Zwelihle to accommodate the proposed 25m high monopole mast for the following departures:
  - (i) to relax the western street building from 5m to 0m;
  - (ii) to relax the maximum permitted boundary wall height from 2.1m to 3.5m, and
  - (iii) to relax the height restriction from 10m to 25m.

**not be approved** in terms of the provisions of Section 61 of the By-Law.

3. that the applicant be notified of their right of appeal in terms of Section 78 of the Overstrand Municipality Amendment By-Law on Land Use Planning, 2020 with regard to the above decision.

## 14. REASONS FOR RECOMMENDATION

- ❖ The application has followed due procedure.
- ❖ None of the relevant internal departments have any object.
- ❖ A telecommunication tower has been approved on 24 November 2025 across the street from the subject site.
- ❖ The proposal will not improve the signal strength or capacity for the community adequately since there is already an existing approval for a telecommunication tower in close proximity.

- ❖ The proposed transmission tower will contribute to economic development and will ensure improved access to telecommunication services and emergency services.

**15. ANNEXURES**

Annexure A:	Locality Plan
Annexure B:	Motivation Report
Annexure C:	Site Development Plan
Annexure D:	Services Report
Annexure E:	Comment: Openserve (Telkom)
Annexure F:	Support letter received from DEA&DP
Annexure G:	Comment: Western Cape Government: DEA&DP (Environmental)
Annexure H:	Comment: National Department of Health

**SIGNATURES****AUTHOR**

Name: **BC MINNAAR**

SACPLAN Reg No: **C/8630/2021**

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**REGISTERED PLANNER**

Name: **H VAN DER STOEP**

SACPLAN registration number: **A/1708/2013**

Signature: \_\_\_\_\_

Date: \_\_\_\_\_



**SBA TOWERS SITE ID:** ATSA1598  
**SBA TOWERS SITE NAME:** LUKHANYO PRIMARY SCHOOL  
**PROPERTY DESCRIPTION:** ERF 219, ZWELIHLE  
**ADDRESS:** LUSIBA STREET, ZWELIHLE, WESTERN CAPE  
**CO-ORDINATES:** Lat: -34.430732° Long: 19.211052°  
**ELEVATION:** 20m



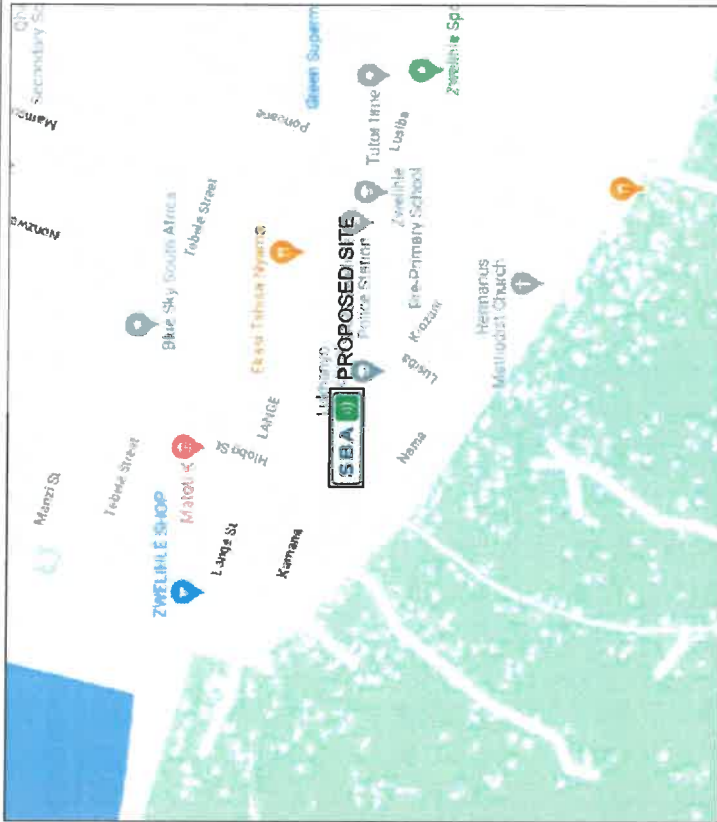
**TOWN AND REGIONAL PLANNING CONSULTANTS**  
 Unit H, 3rd Floor  
 Alberts Building, Breezyway,  
 Century City, Cape Town  
 Tel: (021) 552 2656  
 Fax: (021) 537 9187

**PROJECT:** PROPOSED NEW SBA TOWERS 25m LATTICE MAST WITH 44m<sup>2</sup> BASE STATION  
**APPROVED MAST:** 25m LATTICE MAST

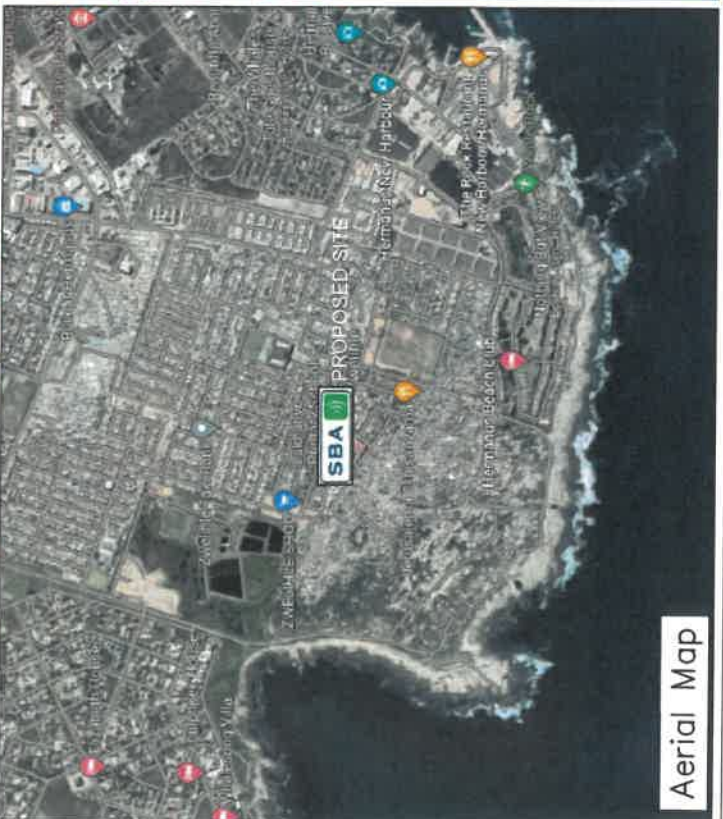
**NOTES:**  
 A) NEW 25m LATTICE MAST  
 B) 5.5m x 8.0m BASE STATION  
 C) 3.0m HIGH WALL WITH 500mm PALISADE FENCE AND RAZOR COIL ON TOP.  
 D) BASE STATION: CHIP STONE SURFACE

DATE	DESCRIPTION	REVISION
18-09-2024	1st issue	0
07-11-2024	Change design	1

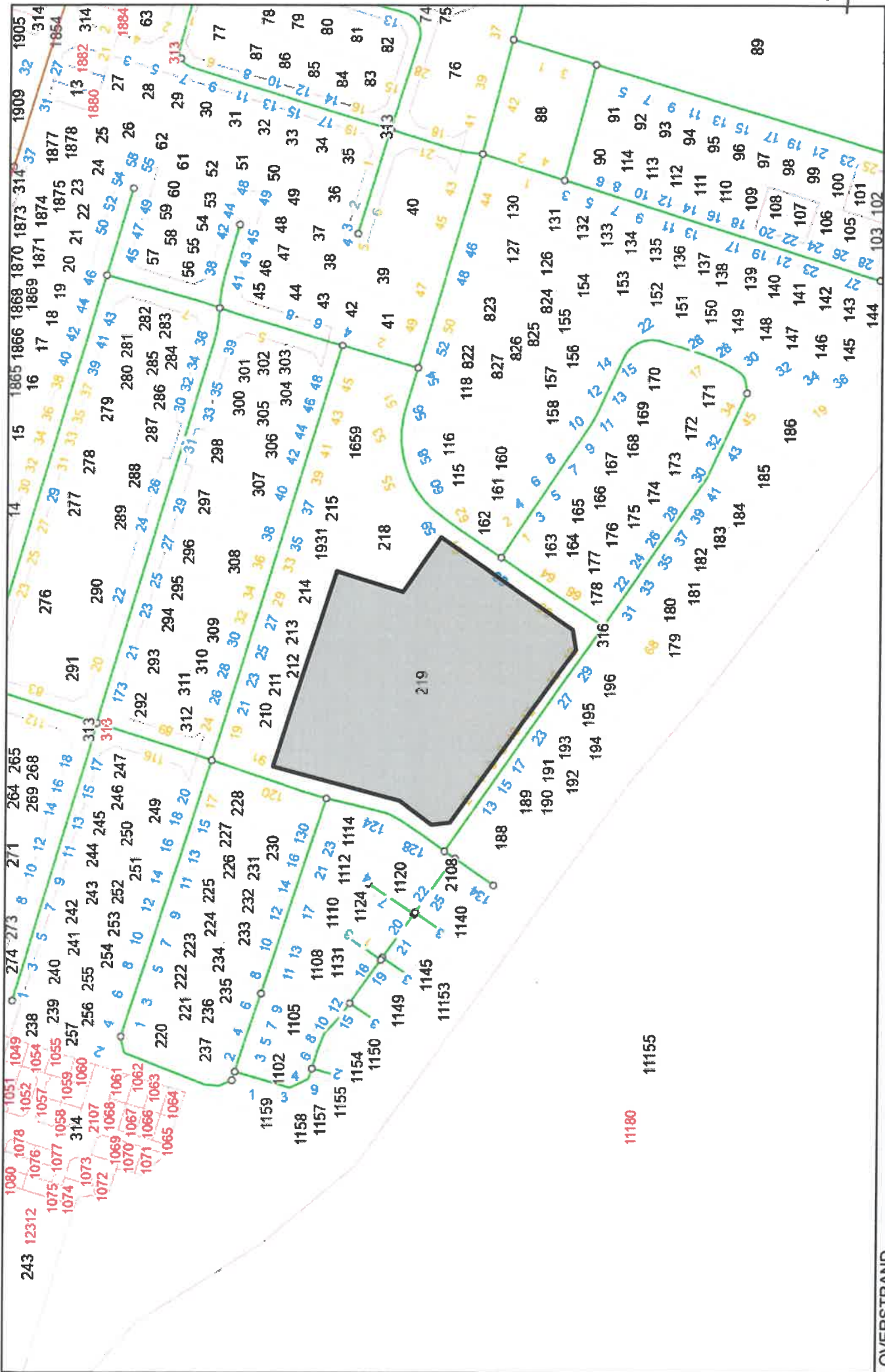
**DRAWING NUMBER:** ATSA1598  
**SHEET:** 1 OF 5  
**DRAWING TITLE:** LOCALITY MAP  
**DRAWN:** D. LOOTS  
**SCALE:** NTS  
**DATE:** 2024-11-07  
**REVISION:** 1



Locality Map



Aerial Map



Locality Map

ERF 219, 63 LUSIBA STREET, ZWELIHLE

<b>PROPERTY DESCRIPTION:</b>	<b>ERF 219 (UNREGISTERED PORTION OF ERF 316) ZWELIHLE</b>
<b>MUNICIPAL AREA:</b>	<b>OVERSTRAND MUNICIPALITY</b>
<b>APPLICATION:</b>	<b><u>CONSENT USE AND PERMANENT DEPARTURE APPLICATION TO PERMIT A TRANSMISSION APPARATUS</u></b>
<b>SITE NAME:</b>	<b>LUKHANYO PRIMARY SCHOOL</b>



<b>APPLICANT:</b>	<b>WARREN PETERSON PLANNING</b>
<b>ON BEHALF OF/ FOR OWNER:</b>	<b>SBA TOWERS SOUTH AFRICA OVERSTRAND MUNICIPALITY</b>
<b>DATE:</b>	<b>DECEMBER 2024 (REVISED MARCH 2025)</b>



**Overstrand Local Municipality**  
**Town Planning Department**  
Hermanus  
Magnolia Street  
7200

3 December 2024  
*(Revised 6 March 2025)*

Dear Sir/Madam

**CONSENT USE AND PERMANENT DEPARTURE APPLICATION IN ORDER TO PERMIT A TRANSMISSION APPARATUS ON ERF 219 (UNREGISTERED PORTION OF ERF 316) ZWELIHLE**

Kindly find attached in this application, the motivation and relevant documentation regarding a land use application in terms of the zoning scheme to allow for the establishment of a transmission apparatus on Erf 219 (unregistered portion of Erf 316) Zwelihle.

This proposal will be greatly beneficial for the inhabitants of Zwelihle – which includes local businesses, and residents – as well as surrounding communities and commuters. This benefit relates to the fact that an improvement will be experienced in terms of network provision and coverage. In its end, this will enhance the level of health and safety (accessibility to emergency services e.g. ambulances, police, fire department etc.), social interaction (accessibility to social media e.g. Facebook, Instagram, Snapchat etc.) and economic efficiency (accessibility of businesses and individuals to faster, efficient and reliable internet and communication connectivity).

*This application is by no means a careless act as health and environmental aspects are taken into consideration with associated proof that this development holds no threat for inhabitants and/or commuters.*

Should the need arise for additional information, please do not hesitate to contact our office. We furthermore wish to thank you in advance for the positive consideration of this application.

Yours faithfully



**DIRKO LOOTS**  
**Pr. Pln A/3308/2023**  
**WARREN PETERSON PLANNING**

## TABLE OF CONTENTS

<b>SECTION A: BACKGROUND</b> .....	6
<b>A.1. THE APPLICATION</b> .....	6
<b>A.2. DETAILS OF THE DEVELOPMENT AREA</b> .....	6
<b>SECTION B: DEVELOPMENT PROPOSAL</b> .....	7
<b>B.1. APPLICATION SPECIFICATIONS</b> .....	7
B.1.1 Development Concept .....	7
B.1.2 Consent Use .....	7
B.1.3 Height Restrictions .....	7
B.1.4 Building Line Relaxation .....	8
<b>B.2. UTILITY SERVICES</b> .....	8
<b>B.3. ENVIRONMENTAL REGULATIONS</b> .....	8
<b>SECTION C: POLICY AND LEGISLATION</b> .....	9
C.2.1. Overstrand Municipality Land Use Scheme, 2020.....	9
<b>C.2. OTHER POLICIES AND LEGISLATION</b> .....	10
D.2.3. Municipal Spatial Development Framework, 2020 .....	10
<b>SECTION D: DEVELOPMENT MOTIVATION</b> .....	11
D.2.1. Need and Desirability .....	12
D.2.2. Choice of site .....	14
D.2.3. Alternative sites .....	19
D.2.4. Visual Impact.....	20
<b>SECTION E: CONCLUSION</b> .....	24

## LIST OF FIGURES

Figure 1 - Figure 2.2 on Page 21 of the MSDF, 2020	11
Figure 2 - Telkom Mobile network coverage map: LTE	12
Figure 3 – Vodacom Coverage Map: 5G	13
Figure 4 - MTN Coverage Map: Before (left) and after (right) coverage	13
Figure 5 - Frequency and wave length	14
Figure 6 - Zoning map of surrounding area	15
Figure 7 - Land use map of surrounding area	15
Figure 8 - Proposed location for the transmission apparatus	16
Figure 9 - Heritage Map	17
Figure 10 - Environmental Map	17



Warren Petterson Planning  
 P.O. Box 152  
 Century City  
 7446

T: (021) 552 5255  
 F: (086) 537 9187  
 C: (083) 255 8349  
 E: dloots@wpplanning.co.za

Figure 11 – 1km radius of the proposed site and surrounding transmission apparatus	18
Figure 12 - Alternatives considered	19
Figure 13 - Alternative positions explored on-site	20
Figure 14 – 25m Lattice mast viewed from Hlobo Street	21
Figure 15 – 25m Lattice mast viewed from Nama Street	22
Figure 16 - 25m Monopole mast viewed from Hlobo Street	22
Figure 17 – 25m Monopole mast viewed from Nama Street	23
Figure 18 - 25m Tree mast viewed from Hlobo Street	23
Figure 19 - 25m Tree mast viewed from Nama Street	24

**LIST OF TABLES**

Table 1 - Definitions .....	5
Table 2 - Abbreviations .....	5
Table 3 - Details of the Development Area.....	6
Table 4 - Surrounding Transmission apparatus as alternatives .....	18

## LIST OF DEFINITIONS AND ABBREVIATIONS

This section represents the definitions and abbreviations that will be found in this application.

### DEFINITIONS:

**Please note:** *For the purpose of this application and its associated descriptions and motivation, and unless it appears otherwise in the text, the terms used herein are as follows:*

Table 1 - Definitions

<b>PROPERTY:</b>	Erf 219 (unregistered portion of Erf 316) Zwelihle (here after referred to as the application site)
<b>CLIENT:</b>	SBA Towers South Africa
<b>APPLICANT:</b>	Warren Petterson Planning
<b>OWNER:</b>	Overstrand Municipality
<b>CONSENT USE</b>	means the secondary use right that is permitted in terms of the provisions pertaining to a particular zone, only with the consent of the Council
<b>DEPARTURE</b>	means a permanent departure or a temporary departure (has the meaning assigned to it by Planning Law)
<b>RESTRICTIVE CONDITION</b>	means any condition registered against the title deed of land restricting the use, development or subdivision of land concerned, excluding servitudes creating real or personal rights
<b>SURVEYOR-GENERAL</b>	means the Surveyor-General as defined in the Land Survey Act

### ABBREVIATIONS:

**Please note:** *For the purpose of this application and its associated descriptions and motivation, and unless it appears otherwise in the text, the terms used herein are as follows:*

Table 2 - Abbreviations

<b>OZS</b>	Overstrand Zoning Scheme
<b>SPLUMA</b>	Spatial Planning and Land Use Management Act, 2013
<b>RBTS</b>	Rooftop Base Telecommunication Station
<b>TA</b>	Transmission apparatus
<b>TI</b>	Telecommunication Infrastructure
<b>TOA</b>	Top of Antenna
<b>SG-DIAGRAM</b>	Surveyor-General Diagram
<b>SDF</b>	Spatial Development Framework
<b>IDP</b>	Integrated Development Plan

## SECTION A: BACKGROUND

### A.1. THE APPLICATION

Application is hereby made for the following:

- ✓ **Consent Use provided for in the zoning scheme** in terms of Section 16(2)(o) of Overstrand Municipality By-law on Municipal Land Use Planning, 2020 for the purpose of erecting an 25m TA.
- ✓ **Permanent Departure** from the development parameters in terms of section 16(2)(b) of the Overstrand Municipality By-law on Municipal Land Use Planning, 2020 for the purpose of the relaxation of the western street building line from 5m to 0m in order to allow for the proposed transmission apparatus.
- ✓ **Permanent Departure** from the development parameters in terms of section 16(2)(b) of the Overstrand Municipality By-law on Municipal Land Use Planning, 2020 for the purpose of the relaxation of permitted height from 10.5m to 25m in order to allow for the proposed 25m TA.
- ✓ **Permanent Departure** from the development parameters in terms of section 16(2)(b) of the Overstrand Municipality By-law on Municipal Land Use Planning, 2020 for the purpose of the relaxation of permitted height of the boundary wall from 2.1m to 3.5m in order to allow for the proposed 3.5m high wall (for security purposes).

### A.2. DETAILS OF THE DEVELOPMENT AREA

Table 3 - Details of the Development Area

<b>TITLE DEED DESCRIPTION</b>	Erf 316, Portion of Erf 314 Zwelihle, Overstrand Municipality, Division Caledon, Province of the Western Cape
<b>TITLE DEED NUMBER</b>	T10034/1995
<b>PROPERTY SIZE (m<sup>2</sup>)</b>	12.9726 Ha
<b>CURRENT ZONING</b>	Community Zone 1: Community Facilities
<b>OWNER OF PROPERTY</b>	Overstrand Municipality



Warren Petterson Planning  
P.O. Box 152  
Century City  
7446

T: (021) 552 5255  
F: (086) 537 9187  
C: (083) 255 8349  
E: dlots@wpplanning.co.za

## SECTION B: DEVELOPMENT PROPOSAL

### B.1. APPLICATION SPECIFICATIONS

The client, SBA Towers South Africa, wishes to apply for consent use and permanent departure in terms of Section 16 (2)(o) & (b) of the Overstrand Municipal Planning By-Law, in order to erect a TA.

#### B.1.1 Development Concept

The application comprises the following proposed development parameters:

- ✓ A 25m Lattice Tower (Transmission apparatus),
- ✓ 12 x antennas attached to the Tower,
- ✓ Microwave dishes attached to the tower,
- ✓ 1 x Equipment container with space for four service providers, which will be locked at all times, and
- ✓ A 3m high wall with 0.5m palisade fence on top (high security site).

The total area of the TA will be 44m<sup>2</sup>. The main purpose of the proposed transmission apparatus is to improve the network coverage (LTE services) for the various service providers (MTN, Vodacom, Rain and Telkom Mobile). The transmission apparatus furthermore connects to the surrounding existing network, including Onrus, Sandbaai and Hermanus, which reduces loss of reception areas (dead zones) when leaving the coverage radius of an existing TA.

#### B.1.2 Consent Use

A transmission apparatus is permitted as a consent use on a Community Zone 1 property. Accordingly, no rezoning is required in order to accommodate the proposed transmission apparatus. The use of the transmission apparatus will not interfere with the primary use of the property, being a place of instruction, as the area of the transmission apparatus only extends 44m<sup>2</sup> and will be located on a portion of the property that is not easily accessible to students attending the school.

#### B.1.3 Height Restrictions

According to the Overstrand Municipality's zoning scheme, properties zoned as 'Community Zone 1', have a height restriction of 10.5m. A 25m tower is proposed in this application, thus a permanent departure is applied for in terms of Section 16(2)(b) Overstrand Municipality By-law on Municipal Land Use Planning, 2020 to allow for the erection of a 25m tower. The height restriction will subsequently be relaxed from 10.5m to 25m for the purpose of erecting a 25m tower on the subject property. The 25m height is required in order to accommodate more service providers at one location and to provide coverage to a larger area. The aim is to limit the proliferation of masts in the area.

According to Chapter 16 of the Overstrand Municipality Land Use Scheme, 2020 the height of boundary walls are limited to 2.1m. Considering the sense of place of the surrounding area it is

considered to be a high risk area. This results in the need to improve the security measures of the proposed TA in order to minimise theft and vandalism. A 3m high wall with 500mm palisade fence on top is therefore proposed in order to ensure the safety of the mast and equipment.

Accordingly, a permanent departure is applied for in terms of Section 16(2)(b) Overstrand Municipality By-law on Municipal Land Use Planning, 2020 to allow for the proposed 3.5m boundary wall in lieu of the permitted 2.1m height.

#### B.1.4 Building Line Relaxation

According to the Overstrand Municipality's zoning scheme, properties zoned as 'Community Zone 1', have building line restrictions of 5m. The TA is proposed against the property boundary within the western 5m street building line. The available space on the property is limited considering that the property is utilised as a place of instruction. The proposed position was identified as the most suitable option on the property, considering that this area has limited access via the school's property, it will not interfere with any activities relating to the use of the property and there are no underground services at the proposed location. There are manholes and underground services further north along the open strip on the western side of the property. A permanent departure is therefore applied in terms of Section 16(2)(b) of the Overstrand Municipality By-law on Municipal Land Use Planning, 2020 in order to allow for the relaxation of the 5m western street building line to 0m to accommodate the proposed TA.

## B.2. UTILITY SERVICES

Electricity for the TA will be obtained from the available on-site electrical supply to the property. Advances in technology (telecommunication related equipment) enable the TA to utilise less electricity.

**Access to the proposed TA will be obtained via the main access gate to the property, situated along Lusiba Street. Only pedestrian access will be available for access to the TA. The route for pedestrian access will be along the northern boundary of the property behind the buildings.**

**For construction purposes (30 days), temporary access will however be required from Hlobo Street as the equipment and mast associated with the TA cannot be transported to the proposed location via the main access gate of the school due to space constraints.**

The proposed use will have no impact on the external engineering services, on transport or traffic related considerations, or on the biophysical environment.

## B.3. ENVIRONMENTAL REGULATIONS

An application was lodged with the Department of Environmental Affairs and Development Planning (refer to Annexure F) confirming that environmental authorization is not required.

## SECTION C: POLICY AND LEGISLATION

### C.2.1. Overstrand Municipality Land Use Scheme, 2020

**In terms of Chapter 16.10.23, applications for the installation of Transmission Apparatus (TA) shall, to the satisfaction of the Municipality, incorporate the following:**

**(a). Site Development Plan which clearly illustrates the proposal in the context of the existing landscape and receiving environment, with reference to application guidelines as may be incorporated in the application form;**

Please refer to sheet 2 of 5 of the drawings dated 07-11-2024, Revision 1.

**(b). Telecommunication Apparatus Infrastructure Plan (indicating but not limited to the following, namely dimensioned plans showing detail of TA, graphic illustration of the proposed facility, elevation details, proposed materials and colours, screening or fencing)**

Please refer to sheet 3 of 5 of the drawings dated 07-11-2024, Revision 1. Please also refer to Figures 14 to 19 indicating what the tower is expected to look like.

**(c). Site Development Plan & Telecommunication Apparatus Infrastructure Plan to be accompanied by a report detailing the motivation for the selected site, how the siting and design of the facility responds to the SDP;**

Please refer to Section D.2.2 of the motivation report.

**(d). Motivation report to be accompanied by relevant proof pertaining to need and desirability (demand & technical requirements);**

Please refer to Section D.2.1 of the motivation report, as well as Annexure G.

**(e). Application to satisfactorily demonstrate to the AO / MPT that all alternatives to the site itself have been explored within a 1km radius of the subject property;**

Please refer to Section D.2.3 of the motivation report.

**(f). Minimum of two alternative sites and design options to be considered;**

Please refer to Sections D.2.3 and D.2.4 of the motivation report.

**(g). Zoning and land use map to accompany application, that shall also indicate all areas of heritage or environmental significance, if applicable;**

Please refer to Figures 6, 7, 9 and 10.

**(h). Visual Impact Assessment prepared by a suitably qualified professional, if required by the municipality, that shall incorporate mitigation measures limiting visual impact;**

A Visual Impact Assessment was conducted in November 2024 by ARLA Consulting Landscape Architects.

**(j). Statement demonstrating that the installation complies with the applicable health and safety standards.**

Please refer to Annexure I that forms part of the application.

## C.2. OTHER POLICIES AND LEGISLATION

Other policies and legislative frameworks include the Spatial Development Framework (SDF), 2020.

### D.2.3. Municipal Spatial Development Framework, 2020

This application is in line with the spatial development principles as set out in the Overstrand SDF, 2020, as it strives to improve urban efficiency, and align planned growth with infrastructure. As a result, connectivity is enhanced on local, national and international level as stipulated in the SDF, 2020.

The MSDF 2020 of the Overstrand Municipality also emphasises that population growth is taking place within the Municipal Area. Figure 2.2 on page 21 of MSDF 2020 shows that the population number increased in Zwelihle between 2001 – 2011 (See Figure 1 below which shows figure 2.2 of MSDF). In fact, from 2001 to 2011 the population in Zwelihle has almost tripled and experienced a growth rate of 166% (MSDF, 2020: 21)."

This is supported by the IDP 2022-2027 indicating on page 34 that Zwelihle has the largest population in Hermanus totaling 25098 residents according to the 2022 projection.

With an increase in population, there is a need to provide adequate coverage to consumers, especially taking into account that each consumer have on average 3-5 devices which could benefit from increased coverage.

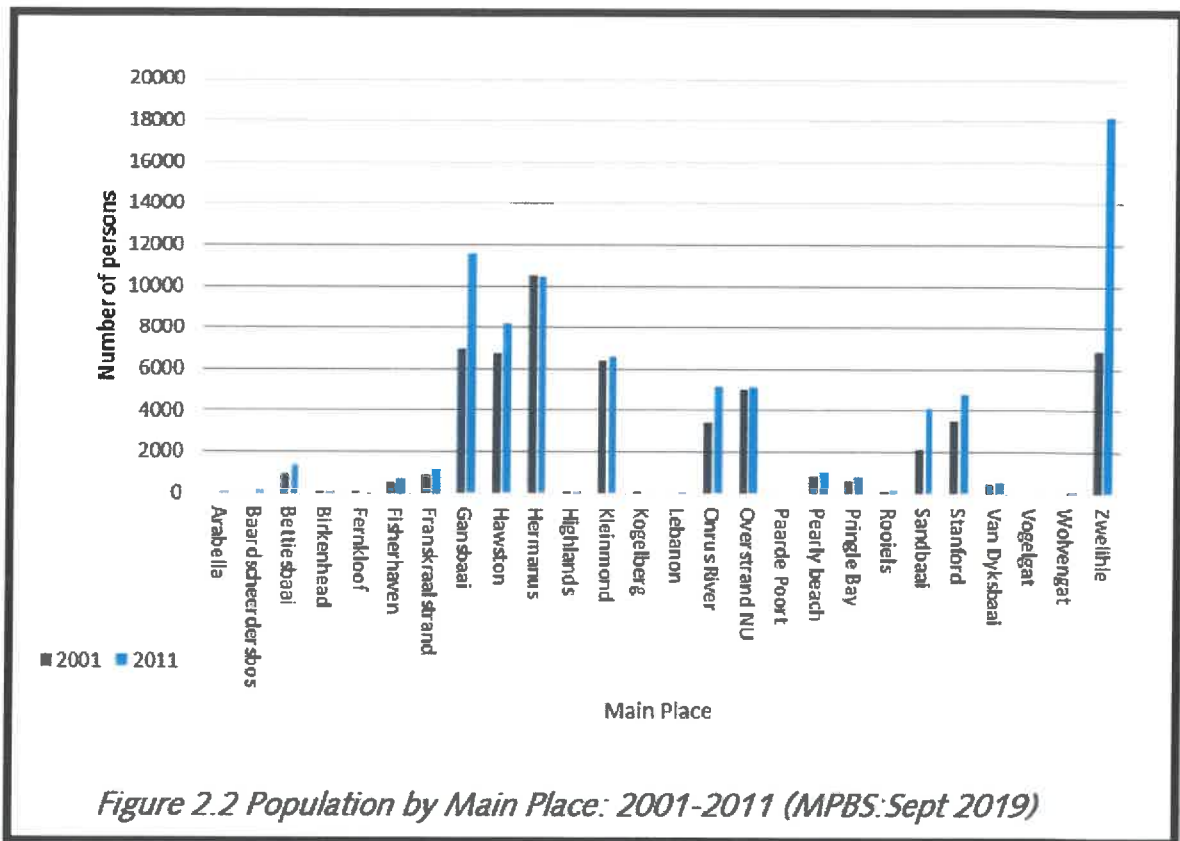


Figure 2.2 Population by Main Place: 2001-2011 (MPBS: Sept 2019)

Figure 1 - Figure 2.2 on Page 21 of the MSDF, 2020

Cellular infrastructure also contribute to the economic growth within municipal area. This is seen on page 35 of MSDF 2020 where the Communication sector has achieved strong annual growth and contributing to the GVA in Overstrand. To emphasise the importance of the proposed Transmission Apparatus, one can refer to the amount of people that were working from home during the Covid-19 pandemic (and a large number still working from home since then), therefore the network capacity is more under pressure that in the past and this proposal will help alleviate this going forward. It is important to note that many people also lost their day-to-day jobs and will continue working from home, therefore it is important to ensure that excellent coverage is enjoyed throughout the entire day.

**SECTION D: DEVELOPMENT MOTIVATION**

Please read together with previous sections in this application. Consent use and permanent departure in terms of the zoning scheme is applied for in order to allow for the erection of a TA should be supported based on the following grounds:

#### D.2.1. Need and Desirability

In a modern-day society, the dependency on communicative technology becomes increasingly higher. This is due to the society's utilisation of more mobile devices and more than one device per household which mainly relies on internet connectivity (e.g. smartphones, portable computers, tablets/iPads etc.). These devices are used for multiple purposes including socialisation, business related uses and accessibility to important emergency services. Due to factors including densification, urbanisation and influx of seasonal guests especially over festive seasons and holidays, in a tourist attractive place like Overstrand, poor network coverage (related to both voice and data) is often experienced. SBA Towers South Africa identified several positions in the area that need to be equipped with transmission apparatus to alleviate the pressure and to cater for the ever-increasing demand.

Please refer to Annexure G, which is a motivation letter from MTN indicating their support and need for additional infrastructure in the area. They specifically refer to the proposed transmission apparatus on Erf 316 Zwelihle and confirm their interest to utilise the proposed transmission apparatus.

Figures 2 to 4 illustrate the current fixed LTE coverage in Zwelihle and the surrounding areas. It is clear from these maps that there are gaps in the network for most of the service providers. Therefore, a TA as proposed in this application will increase the amount of coverage in this area.

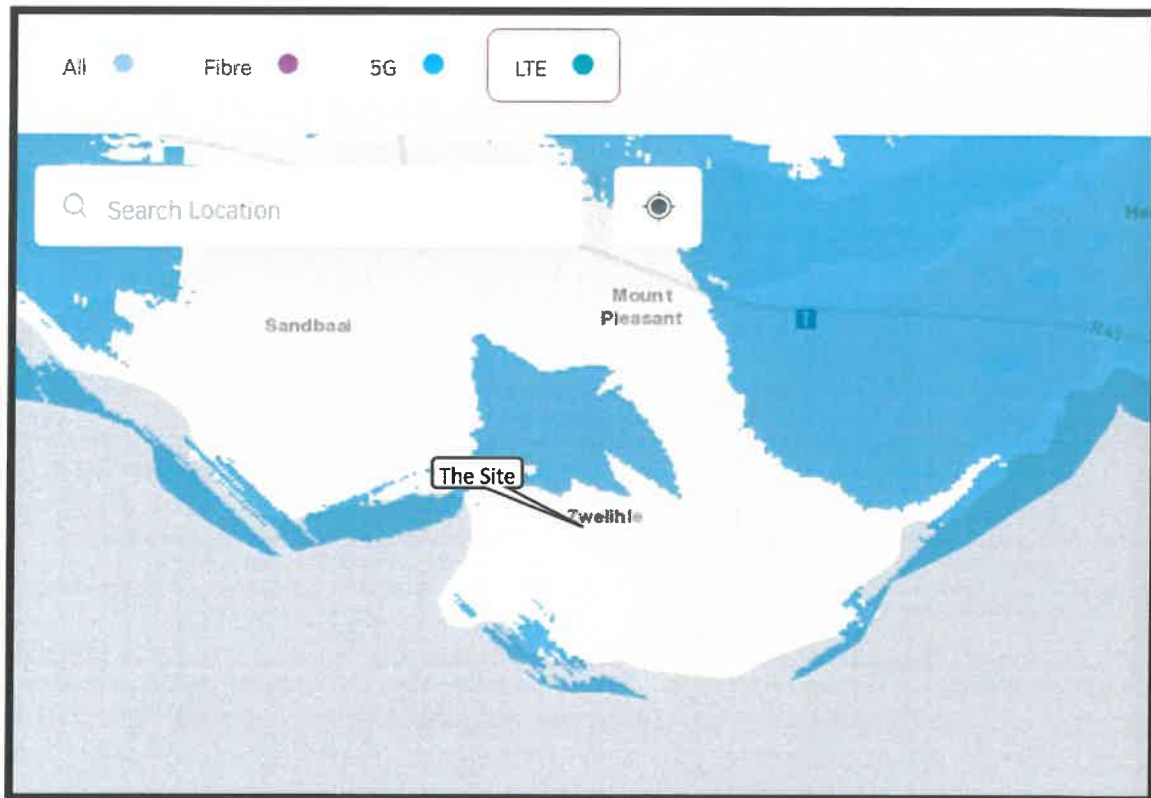


Figure 2 - Telkom Mobile network coverage map: LTE

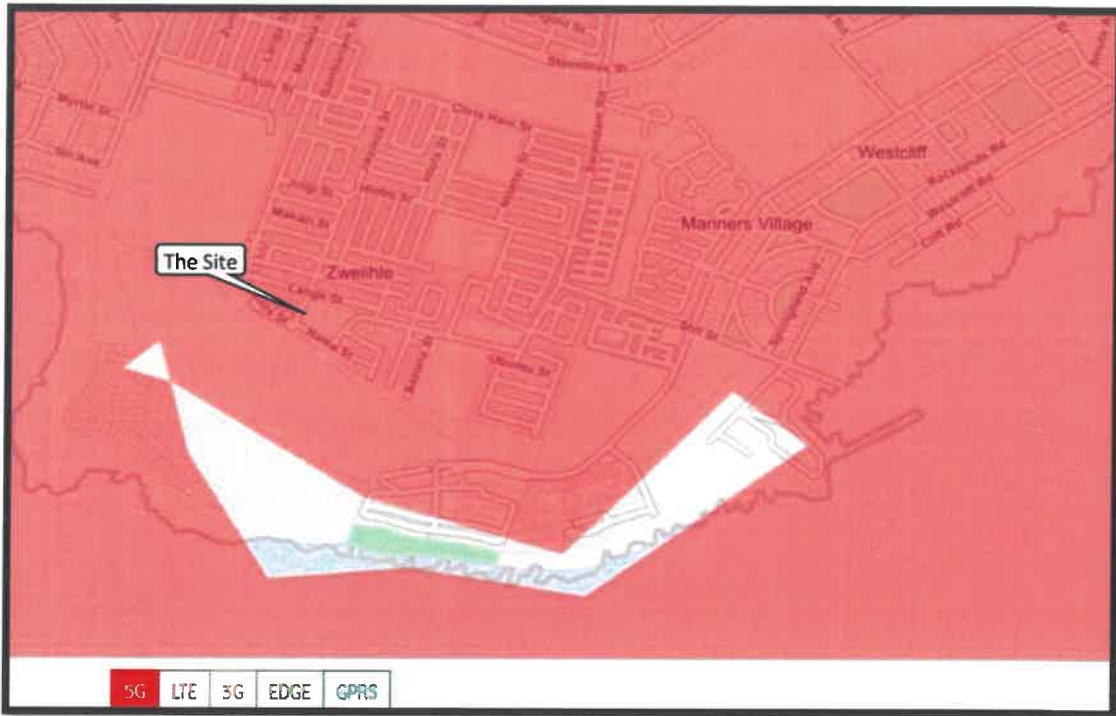


Figure 3 – Vodacom Coverage Map: 5G

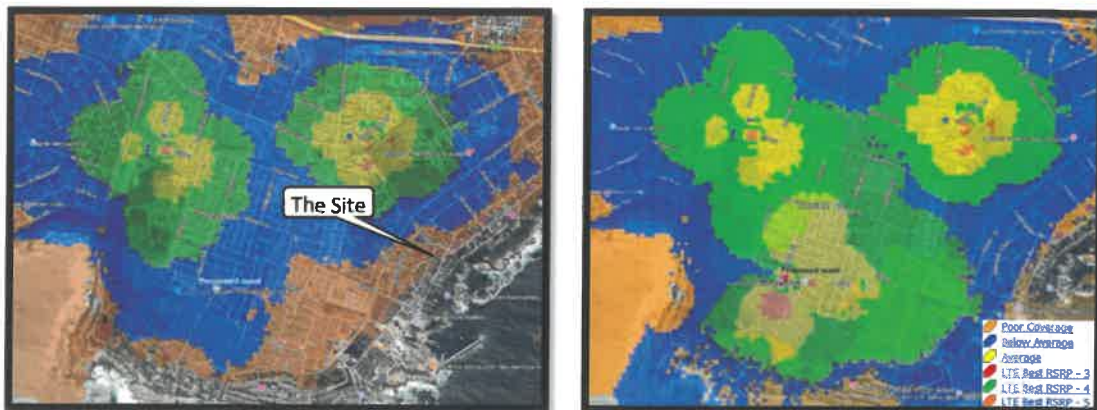


Figure 4 - MTN Coverage Map: Before (left) and after (right) coverage

Figure 2 to 4 are coverage maps that were extracted from the websites of the various service providers. It should be noted that the service providers somewhat exaggerates on content of these coverage maps as it is largely used for marketing purposes. Some of these maps do however clearly reflect that there are gaps in the network and this will be addressed by the proposed transmission apparatus. Figure 4 includes a before and after coverage map that was provided by MTN directly. From this Figure it can clearly be seen how much of a positive impact he proposed TA will have on the surrounding area in terms of coverage.

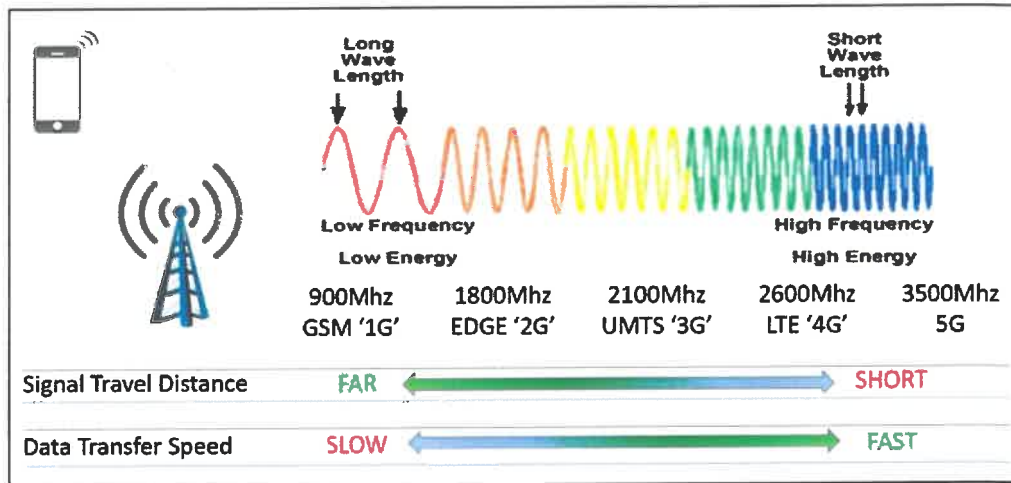


Figure 5 - Frequency and wave length

Figure 5 illustrates how the coverage for different technologies work. Simply put, the more advanced technology that is made available, the smaller the coverage area will be. It is important to note that all service providers are moving towards providing the best technologies to everyone.

The increase in network strength brought by the proposed TA will aid the local businesses and can unlock growth potential which will have a positive economic impact. Residents, businesses and commuters will have a more secure connection to emergency services and armed response which will have a huge social impact.

The proposed transmission apparatus will not interfere with the current use of the property and there are no negative impacts on the surrounding land uses and environment. No trees need to be removed to build the transmission apparatus and no buildings with heritage value will be affected.

#### D.2.2. Choice of site

The site was chosen as it is deemed an excellent location to improve the coverage in Overstrand Municipality. Hermanus Beach Club is situated to the southeast of the proposed site, a large informal residential development is situated to the south, Sandbaai is situated to the northwest, Zwelihle North is situated to the north and Hermanus is situated to the northeast.

Figure 6 below indicates the zoning of the subject property, as well as the zonings of the surrounding properties. There are few businesses that are more focussed along the Lange Street. There are also a few churches and a primary school in the nearby area.



Figure 6 - Zoning map of surrounding area



Figure 7 - Land use map of surrounding area

The transmission apparatus is proposed along the western boundary of the property as this is deemed to have the least impact on the existing activities, flow of movement and existing services.



Figure 8 - Proposed location for the transmission apparatus

From Figures 9 and 10 it is clear that the subject area is not of heritage or environmental significance.



Figure 9 - Heritage Map



Figure 10 - Environmental Map

The need for coverage is however not the only determining factor when identifying a possible position for a transmission apparatus. Other determining factors include altitude, zoning and the visual impact of the proposed transmission apparatus. Distance away from existing transmission apparatus in the surrounding area is also an influencing factor.



Figure 11 – 1km radius of the proposed site and surrounding transmission apparatus

Table 4 - Surrounding Transmission apparatus as alternatives

	<b>Tower &amp; Height</b>	<b>Site location</b>	<b>Distance</b>	<b>Lack of sufficiency</b>
<b>A</b>	Monopole Tower, 25m	Sisulu Street	+/-755m	Failure to provide for the necessary coverage necessity due to distance away from proposed tower. There is a very high population density in close proximity to this site, which significantly reduces its coverage area.
<b>B</b>	Lattice Tower, 25m	Steenbras Road	+/-1 225m	Failure to provide for the necessary coverage necessity due to distance away from proposed tower. MTN is already on this tower and confirmed

				interest in the proposed tower on Erf 316 as well.
--	--	--	--	--

Considering the information in Figure 11 and Table 4 the need for the proposed TA is clear. Existing TA's are not sufficient to provide coverage as the closest TA is 755m away and focusses on a different coverage area. The proposed TA is focussed on the eastern and southern portions of Zwelihle.

### D.2.3. Alternative sites

Alternative sites were considered during the initial stages of the proposal but this option is deemed the most acceptable option in terms of visual impact and based on the requirements of the network providers, contractors and land owner.

Alternative sites considered in surrounding area (Please see Figure 12 on next page):

- Option 1- The property owner was approached some time ago already and they confirmed that they are not interested to accommodate the proposed TA.
- Option 2- The church was approached and indicated that they are not interested based on negative feedback from the nearby community.
- Option 3- The property was approached and a proposal was sent, but due to space constraints the proposal was not proceeded with.
- Option 4- The building that was on this property was demolished at some stage, but the property owner could not be located to pursue this option.



Figure 12 - Alternatives considered

Alternative positions were explored on Erf 219, Zwelihle. Please refer to Figure 13.

- Option A– This position was considered at some stage, but would result in the removal of the main garden area of the school which would not be ideal. This will also be at the entrance point of the school which is not preferred.
- Option B– This position is considered to have the least impact on the activities on the property. There are also no underground services.
- Option C– It was found that there are underground services at this location which would be impacted by the proposed TA.



Figure 13 - Alternative positions explored on-site

#### D.2.4. Visual Impact

The proposed TA will create an opportunity for other service providers to co-locate, as other structures of this height do not exist in this area.

A Visual Impact Assessment was conducted in November 2024 by Arla Consulting Landscape Architects for the proposed TA on Erf 219, Zwelihle. The VIA stated that the visual impact will be minimal (The VIA is provided as part of this application):

*The level of assessment is determined by the type of environment (in this case areas or routes of moderate scenic, cultural, or historical significance) and the type of development (in this case a Category 2 development i.e. small-scale infrastructure).*

According to the above, minimal visual impact is expected and thus a Level 2 VIA, namely:

- Potentially low level of intrusion on landscapes or scenic resources.
- Limited change in the visual character of the area.
- Low-key development, similar in nature to existing development.

The landscape character of the area within which the site is located can be described as an informal settlement with 30m high mast lighting spaced approximately 150m apart.

The VIA also states that a lattice mast is the preferred type of mast. The original proposal was for a 25m monopole mast.

Proposed mitigation measures include:

- The use of muted, matt finishes for all parts of the proposed development / infrastructure to be used whenever possible.
- Fencing should preferably be visually permeable (i.e. no solid walls), however, due to the tower's location (within a high vandal and theft area), it is acknowledged that solid walls will be required to secure the infrastructure.
- Preferably no lights, including along the infrastructure fence line, should be installed with the proposed infrastructure.

The Figures below indicate what the different types of masts are expected to look like at the proposed location on Erf 219 Zwelihle.



Figure 14 – 25m Lattice mast viewed from Hlobo Street



Figure 15 – 25m Lattice mast viewed from Nama Street



Figure 16 - 25m Monopole mast viewed from Hlobo Street



Figure 17 -- 25m Monopole mast viewed from Nama Street



Figure 18 - 25m Tree mast viewed from Hlobo Street



*Figure 19 - 25m Tree mast viewed from Nama Street*

From the above Figures and content of the VIA, we believe that the visual impact of the proposed mast is expected to be minimal.

## **SECTION E: CONCLUSION**

This consent use and permanent departure application in terms of the zoning scheme for a proposed TA on Erf 219, Zwelihle, will provide an essential and sought after service to the surrounding community, businesses and commuters. This application is in line with the current policy and legislation on a local level. Policy and legislation are mainly focused on the Spatial Planning and Land Use Management Act, 2013. Furthermore, this application is in compliance with the Integrated Development Plan (2022– 2027), and Spatial Development Framework (MSDF), 2020.

We trust that this application will meet your requirements and will receive your positive consideration.



**SBA TOWERS SITE ID:** ATSA1598  
**SBA TOWERS SITE NAME:** LUKHANYO PRIMARY SCHOOL  
**PROPERTY DESCRIPTION:** ERF 219, ZWELIHLE  
**ADDRESS:** LUSIBA STREET, ZWELIHLE, WESTERN CAPE  
**CO-ORDINATES:** **ELEVATION:** 20m  
 Lat: -34.430732\*  
 Long: 19.211052



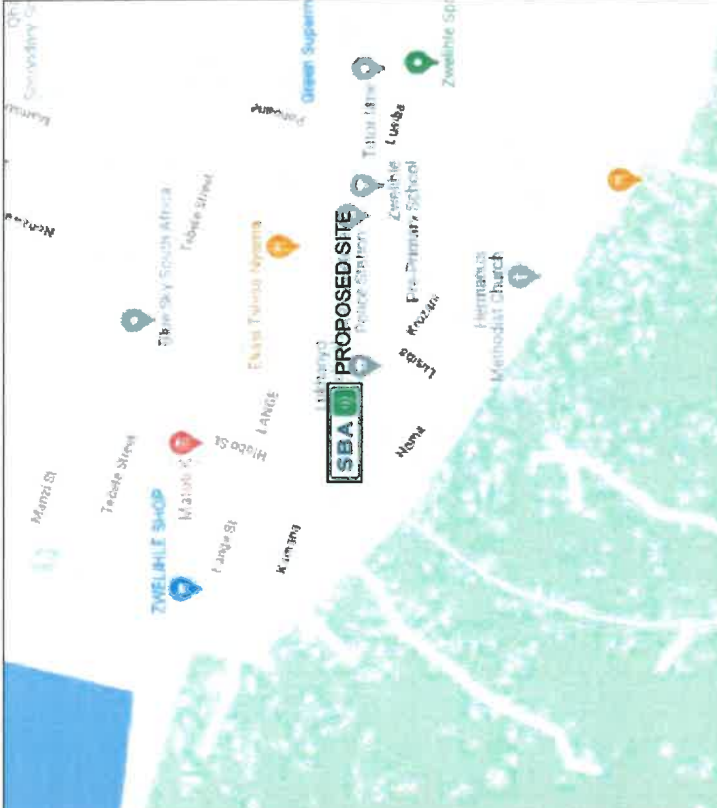
**TOWN AND REGIONAL PLANNING CONSULTANTS**  
 101/11 1st Floor  
 Main Building  
 Century City, Cape Town  
 P.O. Box 152,  
 Century City,  
 7746

**PROJECT:** PROPOSED NEW SBA TOWERS 25m LATTICE MAST WITH 44m<sup>2</sup> BASE STATION  
**APPROVED MAST:** 25m LATTICE MAST

**NOTES:**  
 A) NEW 25m LATTICE MAST  
 B) 5.0m x 6.0m BASE STATION  
 C) 3.0m HIGH WALL WITH 500mm PALISADE FENCE AND RAZOR COIL ON TOP.  
 D) BASE STATION: CHIP STONE SURFACE

DATE	DESCRIPTION	REVISION
18-09-2024	1st Issue	0
07-11-2024	Change design	1
06-03-2025	Additional Information	2

**DRAWING NUMBER:** ATSA1598  
**DRAWING TITLE:** LOCALITY MAP  
**DRAWN:** D. LOOTS  
**SCALE:** NTS  
**DATE:** 2025-03-06  
**REVISION:** 2



Locality Map

Aerial Map



SBA TOWERS SITE ID: ATSA1598  
SBA TOWERS SITE NAME: LUKHANYO PRIMARY SCHOOL  
PROPERTY DESCRIPTION: ERF 219, ZWELIHLE

ADDRESS: LUSIBA STREET, ZWELIHLE, WESTERN CAPE

CO-ORDINATES: ELEVATION: 20m  
Lat: -34.430732\*  
Long: 19.211052\*



TOWN AND REGIONAL PLANNING CONSULTANTS  
Unit H, 3rd Floor, Gateway, Century City, Cape Town  
Tel: (021) 552 3656  
Fax: (021) 557 7167  
P.O. Box 162, Century City, Cape Town, 7448

PROJECT: PROPOSED NEW SBA TOWERS 25m LATTICE MAST WITH 44m<sup>2</sup> BASE STATION

APPROVED MAST: 25m LATTICE MAST

NOTES:

- A) NEW 25m LATTICE MAST
- B) 5.6m x 8.0m BASE STATION
- C) 3.0m HIGH WALL WITH 500mm PALISADE FENCE AND RAZOR COIL ON TOP.
- D) BASE STATION: CHIP STONE SURFACE

DATE	DESCRIPTION	REVISION
18-09-2024	1st issue	0
07-11-2024	Change design	1
06-03-2025	Additional Information	2

DRAWING NUMBER: ATSA1598

SHEET: 2 OF 12

DRAWING TITLE: SITE PLAN

DRAWN: D. LOOTS

SCALE: 1:1000

DATE: 2025-03-06

REVISION: 2

Site Plan





SBA TOWERS SITE ID: ATSA1598  
 SBA TOWERS SITE NAME: LUKHANYO PRIMARY SCHOOL  
 PROPERTY DESCRIPTION: ERF 219, ZWELIHLE  
 ADDRESS: LUSIBA STREET, ZWELIHLE, WESTERN CAPE  
 CO-ORDINATES: Lat: -34.430732\* Long: 19.211052\* ELEVATION: 20m



TOWN AND REGIONAL PLANNING CONSULTANTS  
 Unit 11, 3rd Floor, Po Box 152,  
 1001 1st Street, Sedgebrook, Century City, Cape Town, 7446  
 Tel: 021 552 5656 Fax: 021 552 7167

PROJECT: PROPOSED NEW SBA TOWERS 25m LATTICE MAST WITH 44m<sup>2</sup> BASE STATION  
 APPROVED MAST: 25m LATTICE MAST


NOTES:  
 A) NEW 25m LATTICE MAST  
 B) 5.8m x 6.0m BASE STATION  
 C) 3.0m HIGH WALL WITH 500mm PALISADE FENCE AND RAZOR COIL ON TOP.  
 D) BASE STATION: CHIP STONE SURFACE

DATE	DESCRIPTION	REVISION
18-09-2024	1st Issue	0
07-11-2024	Change design	1
06-03-2025	Additional Information	2

DRAWING NUMBER: ATSA1598 SHEET: 3 OF 12  
 DRAWING TITLE: FIRE PLAN  
 DRAWN: D. LOOTS SCALE: 1:1000  
 DATE: 2025-03-06 REVISION: 2

Fire Plan





**SBA TOWERS SITE ID:**  
ATSA1598


**SBA TOWERS SITE NAME:**  
LUKHANYO PRIMARY SCHOOL

**PROPERTY DESCRIPTION:**  
ERF 219, ZWELIHLE

**ADDRESS:**  
LUSIBA STREET, ZWELIHLE,  
WESTERN CAPE

**CO-ORDINATES:**  
Lat: -34.430732\*  
Long: 19.211052\*

**ELEVATION:**  
20m



**TOWN AND REGIONAL PLANNING CONSULTANTS**  
Unit H, 3rd Floor  
Maboneng Precinct,  
Century City, Cape Town  
P.O. Box 192,  
Century City,  
7440

**PROJECT:**  
PROPOSED NEW SBA TOWERS 25m LATTICE MAST  
WITH 44m<sup>2</sup> BASE STATION

**APPROVED MAST:**  
25m LATTICE MAST

**NOTES:**  
A) NEW 25m LATTICE MAST  
B) 5.5m x 8.0m BASE STATION  
C) 3.0m HIGH WALL WITH 500mm PALISADE FENCE AND  
RAZOR COIL ON TOP.  
D) BASE STATION: CHIP STONE SURFACE

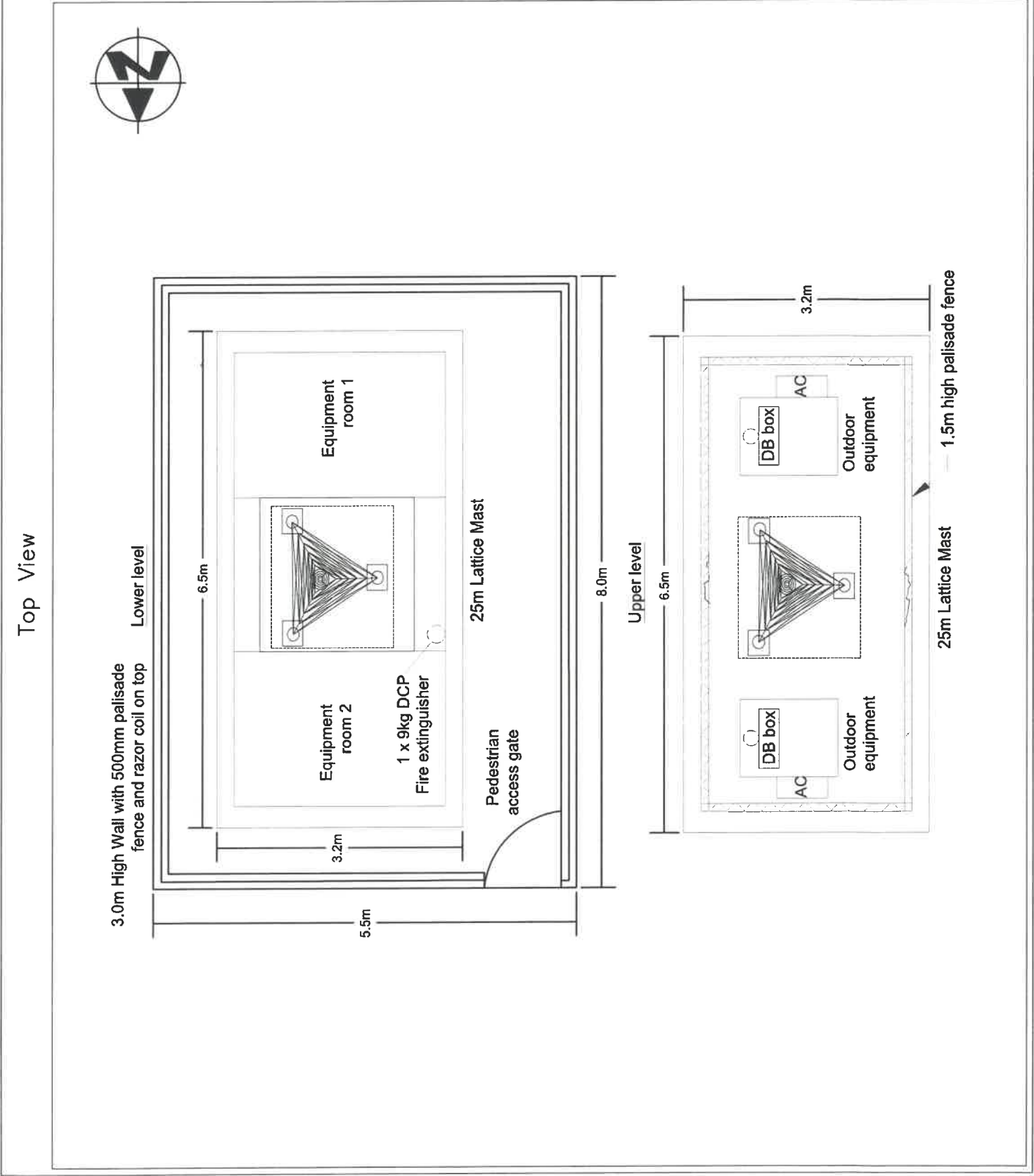
DATE	DESCRIPTION	REVISION
18-09-2024	1st Issue	0
07-11-2024	Change design	1
06-03-2025	Additional Information	2

**DRAWING NUMBER:** ATSA1598  
**SHEET:** 4 OF 12

**DRAWING TITLE:** TOP VIEW

**DRAWN:** D. LOOTS  
**SCALE:** 1:150

**DATE:** 2025-03-05  
**REVISION:** 2





SBA TOWERS SITE ID:  
ATSA1598

SBA TOWERS SITE NAME:  
LUKHANYO PRIMARY SCHOOL

PROPERTY DESCRIPTION:

ERF 219, ZWELIHLE

ADDRESS:  
LUSIBA STREET, ZWELIHLE,  
WESTERN CAPE

CO-ORDINATES:  
Lat: -34.430732°  
Long: 19.211052°  
ELEVATION:  
20m



TOWN AND REGIONAL PLANNING CONSULTANTS  
Unit 1, 3rd Floor,  
Maboneng Buildings,  
Century City, Cape Town  
Tel: (021) 554 6265  
Fax: (021) 551 9161  
P.O. Box 152,  
Century City,  
7448

PROJECT:  
PROPOSED NEW SBA TOWERS 25m LATTICE MAST  
WITH 44m² BASE STATION

APPROVED MAST:  
25m LATTICE MAST

NOTES:

- A) NEW 25m LATTICE MAST
- B) 5.5m x 8.0m BASE STATION
- C) 3.0m HIGH WALL WITH 500mm PALISADE FENCE AND RAZOR COIL ON TOP.
- D) BASE STATION: CHIP STONE SURFACE

DATE	DESCRIPTION	REVISION
18-09-2024	1st Issue	0
07-11-2024	Change design	1
06-03-2025	Additional Information	2

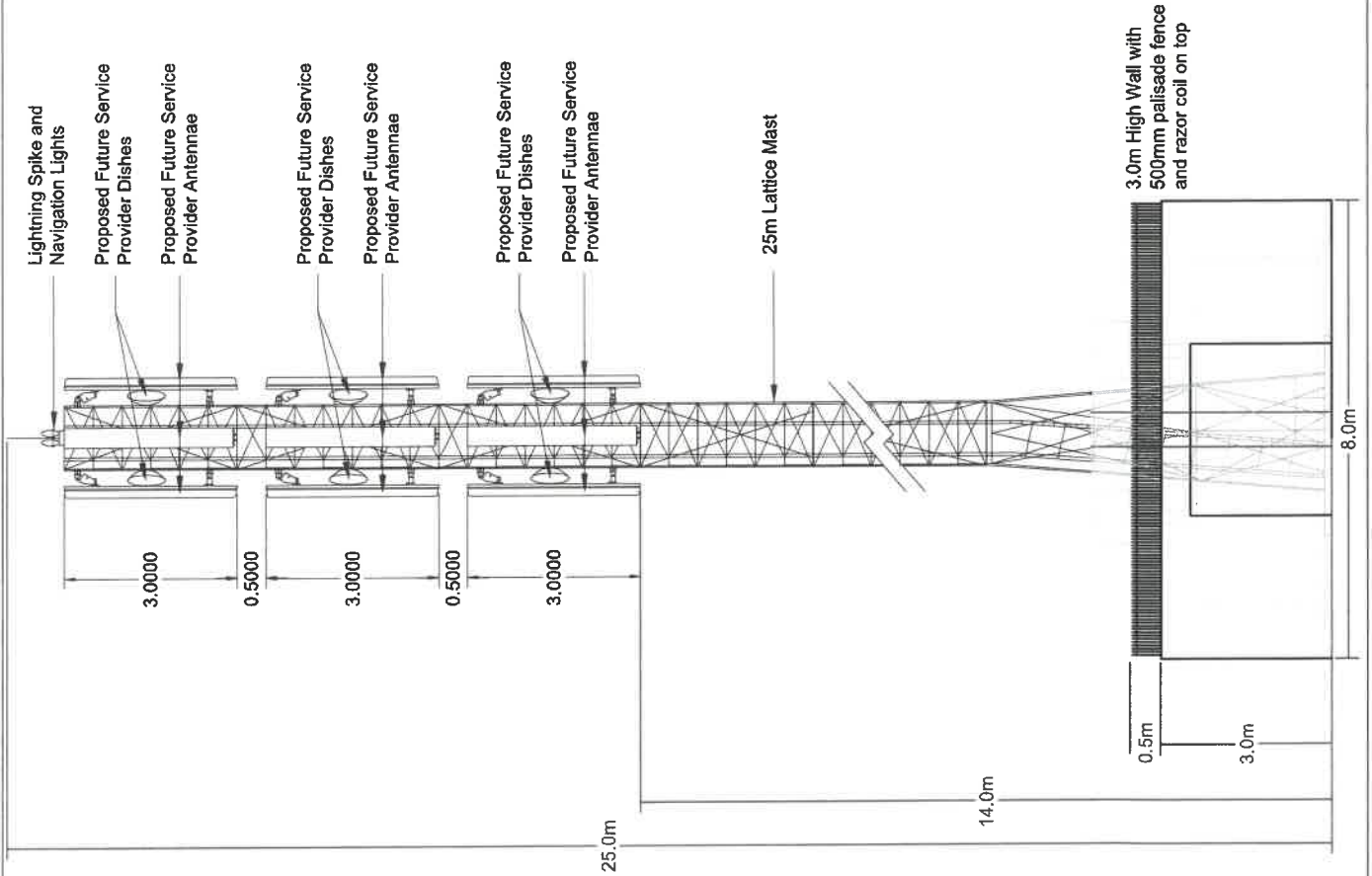
DRAWING NUMBER: ATSA1598  
SHEET:  
5 OF 12

DRAWING TITLE:  
ELEVATION

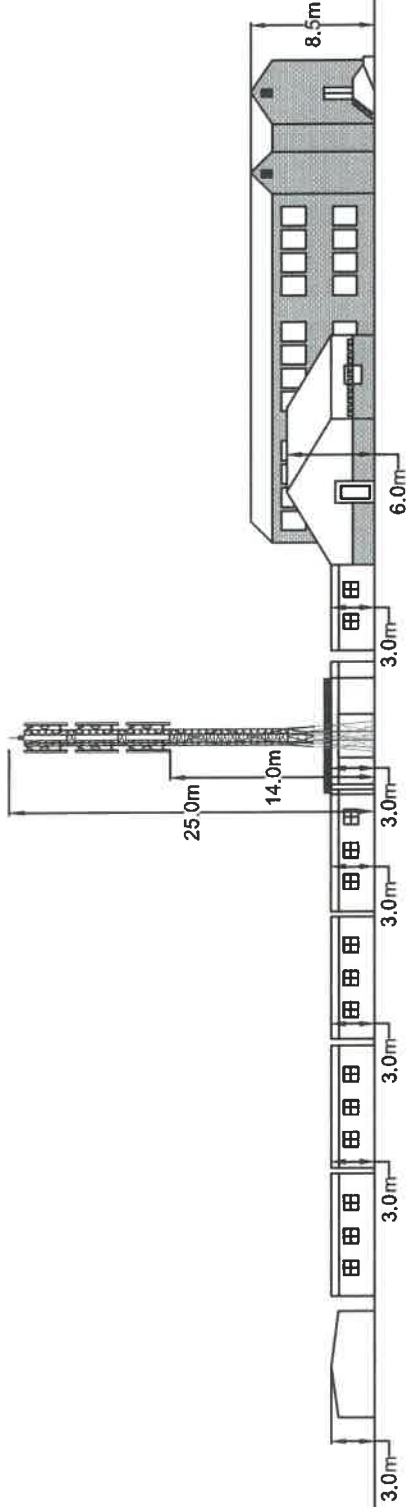
DRAWN: D. LOOTS  
SCALE:  
1:125

DATE: 2025-03-06  
REVISION:  
2

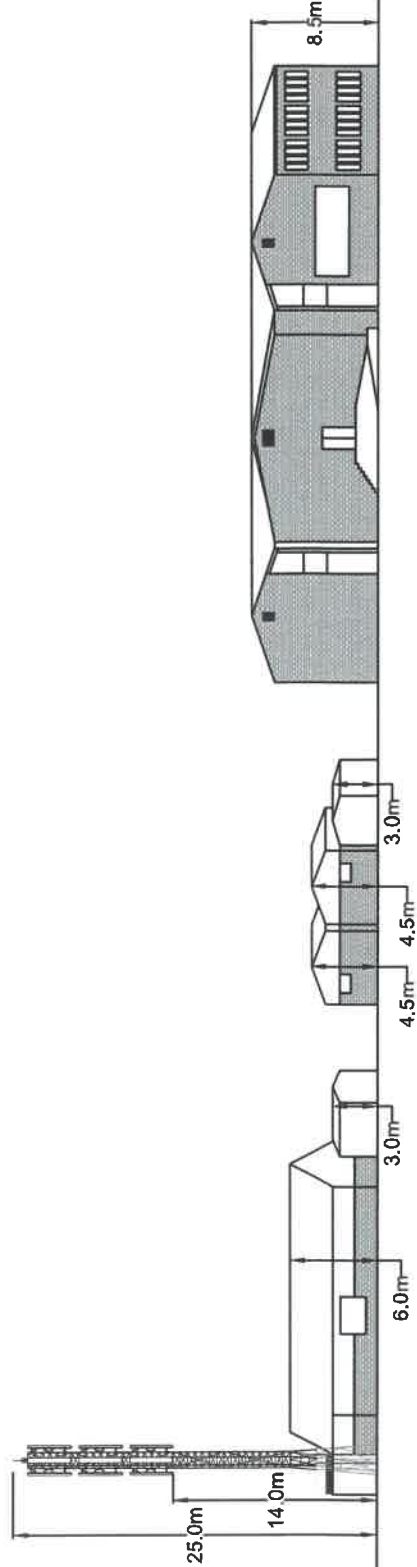
Elevation



Elevation



**WESTERN ELEVATION**



**SOUTHERN ELEVATION**



SBA TOWERS SITE ID:  
ATSA 1598

SBA TOWERS SITE NAME:  
LUKHANYO PRIMARY SCHOOL

PROPERTY DESCRIPTION:  
ERF 219, ZWELIHLE

ADDRESS:  
LUSIBA STREET, ZWELIHLE,  
WESTERN CAPE

CO-ORDINATES:  
Lat: -34.430732\*  
Long: 19.211052\*

ELEVATION:  
20m



Tel: 021 352 5235  
Unit 11, 3rd Floor  
100 Westmead Avenue,  
Century City, Cape Town,  
7448

PROJECT:  
PROPOSED NEW SBA TOWERS, 25m LATTICE MAST  
WITH 44m<sup>2</sup> BASE STATION

APPROVED MAST:  
25m LATTICE MAST

NOTES:  
A) NEW 25m LATTICE MAST  
B) 5.5m x 8.0m BASE STATION  
C) 3.0m HIGH WALL WITH 500mm PALISADE FENCE AND  
RAZOR COIL ON TOP.  
D) BASE STATION: CHIP STONE SURFACE

DATE	DESCRIPTION	REVISION
18-09-2024	1st Issue	0
07-11-2024	Change design	1
06-03-2025	Additional Information	2

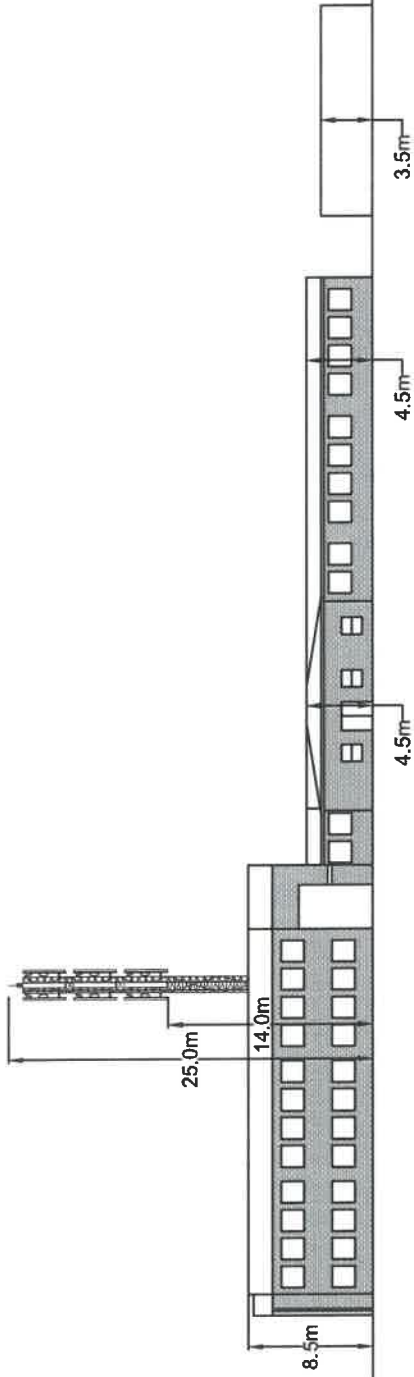
DRAWING NUMBER: ATSA1598  
SHEET:  
6 OF 12

DRAWING TITLE:  
ELEVATION

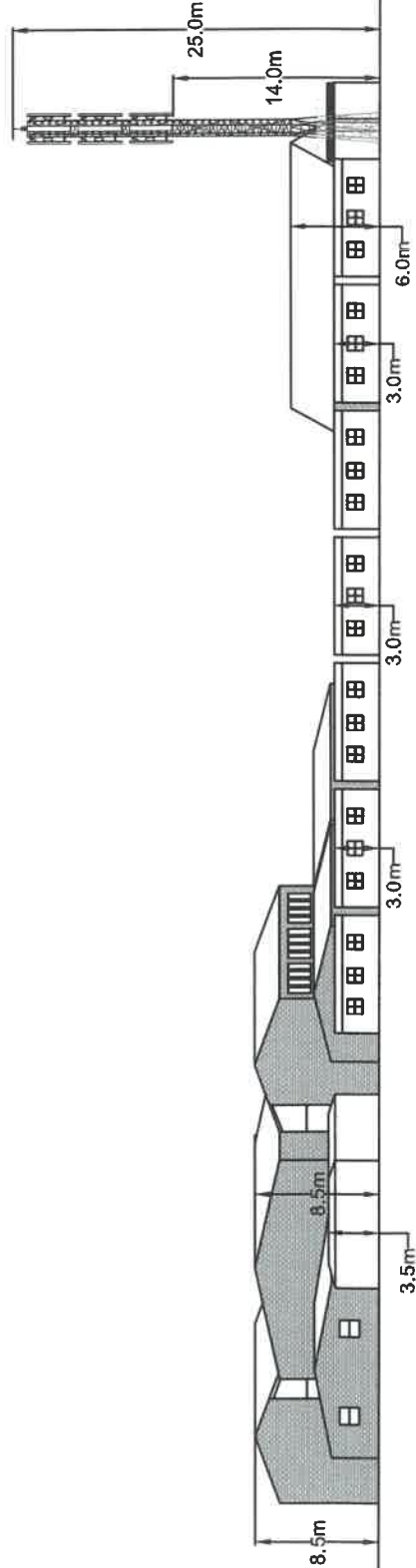
DRAWN: D. LOOTS  
SCALE:  
1:500

DATE: 2025-03-06  
REVISION:  
2

Elevation



**EASTERN ELEVATION**



**NORTHERN ELEVATION**



SBA TOWERS SITE ID:  
ATSA1598

SBA TOWERS SITE NAME:  
LUKHANYO PRIMARY SCHOOL

PROPERTY DESCRIPTION:

ERF 219, ZWELIHLE

ADDRESS:  
LUSIBA STREET, ZWELIHLE,  
WESTERN CAPE

CO-ORDINATES:  
Lat: -34.430732°  
Long: 19.2211052°

ELEVATION:  
20m



Tel: 021 152 5655  
Unit H, 3rd Floor, Ridgeway,  
Century City, Cape Town  
Fax: 021 537 3167  
P.O. Box 152,  
Century City,  
7446

PROJECT:  
PROPOSED NEW SBA TOWERS 25m LATTICE MAST  
WITH 44m<sup>2</sup> BASE STATION

APPROVED MAST:  
25m LATTICE MAST

NOTES:

- A) NEW 25m LATTICE MAST
- B) 5.5m x 8.0m BASE STATION
- C) 3.0m HIGH WALL WITH 500mm PALISADE FENCE AND RAZOR COIL ON TOP.
- D) BASE STATION: CHIP STONE SURFACE

DATE	DESCRIPTION	REVISION
18-09-2024	1st Issue	0
07-11-2024	Change design	1
06-03-2025	Additional Information	2

DRAWING NUMBER: ATSA1598  
SHEET: 7 OF 12

DRAWING TITLE:  
ELEVATION

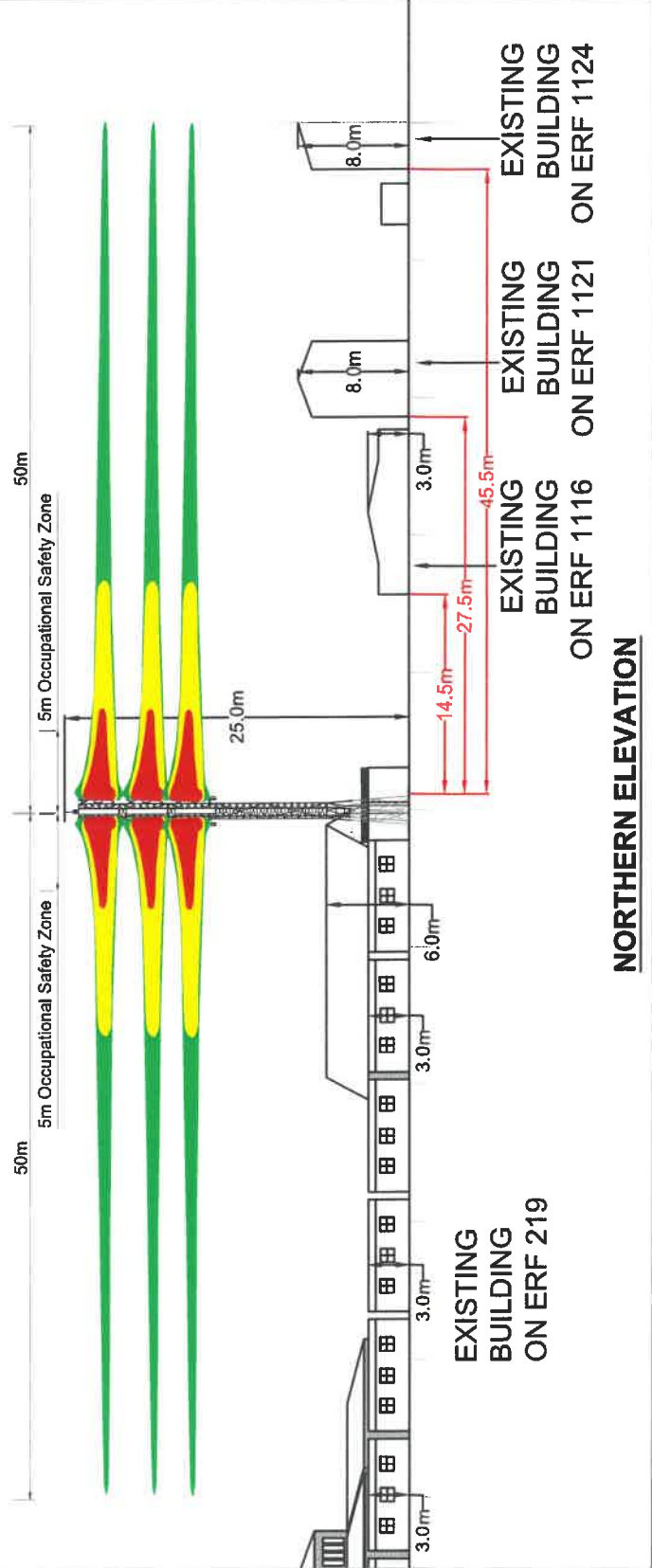
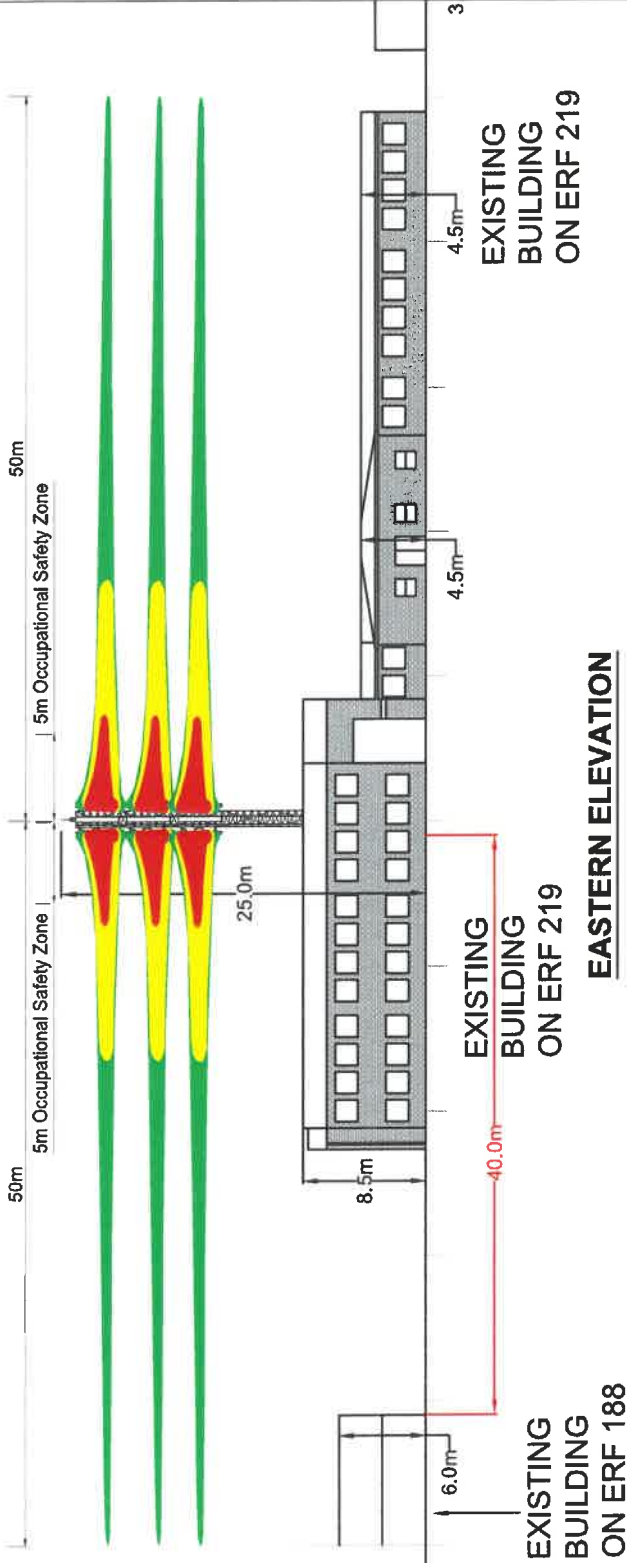
DRAWN: D. LOOTS

SCALE:  
1:500

DATE: 2025-03-06

REVISION:  
2

Public Safety Zone Elevations



SBA TOWERS SITE ID:  
ATS-1598

SBA TOWERS SITE NAME:  
LUKHANYO PRIMARY SCHOOL

PROPERTY DESCRIPTION:  
ERF 219, ZWELIHLE

ADDRESS:  
LUSIBA STREET, ZWELIHLE,  
WESTERN CAPE

CO-ORDINATES:  
Lat: -34.430733\*  
Long: 19.211052\*  
ELEVATION:  
20m



TOWN AND REGIONAL PLANNING CONSULTANTS  
Tel: 081 568 6656  
Unit 11, 4th Floor,  
Main Sandringham Building,  
Century City, Cape Town  
P.O. Box 152,  
Century City, Cape Town  
7448

PROJECT:  
PROPOSED NEW SBA TOWERS 25m LATTICE MAST  
WITH 44m<sup>2</sup> BASE STATION

APPROVED MAST:  
25m LATTICE MAST

NOTES:  
A) NEW 25m LATTICE MAST  
B) 5.5m x 6.0m BASE STATION  
C) 3.0m HIGH WALL WITH 500mm PALISADE FENCE AND  
RAZOR COIL ON TOP.  
D) BASE STATION: CHIP STONE SURFACE

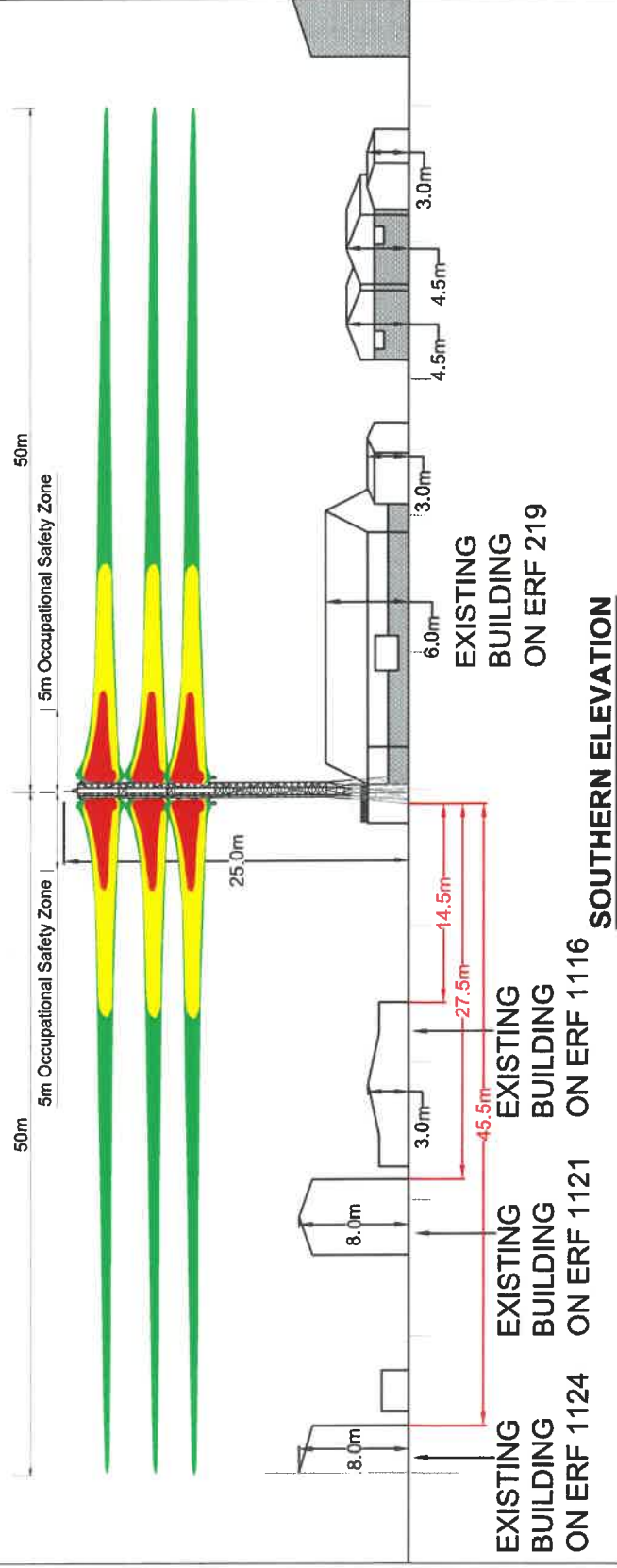
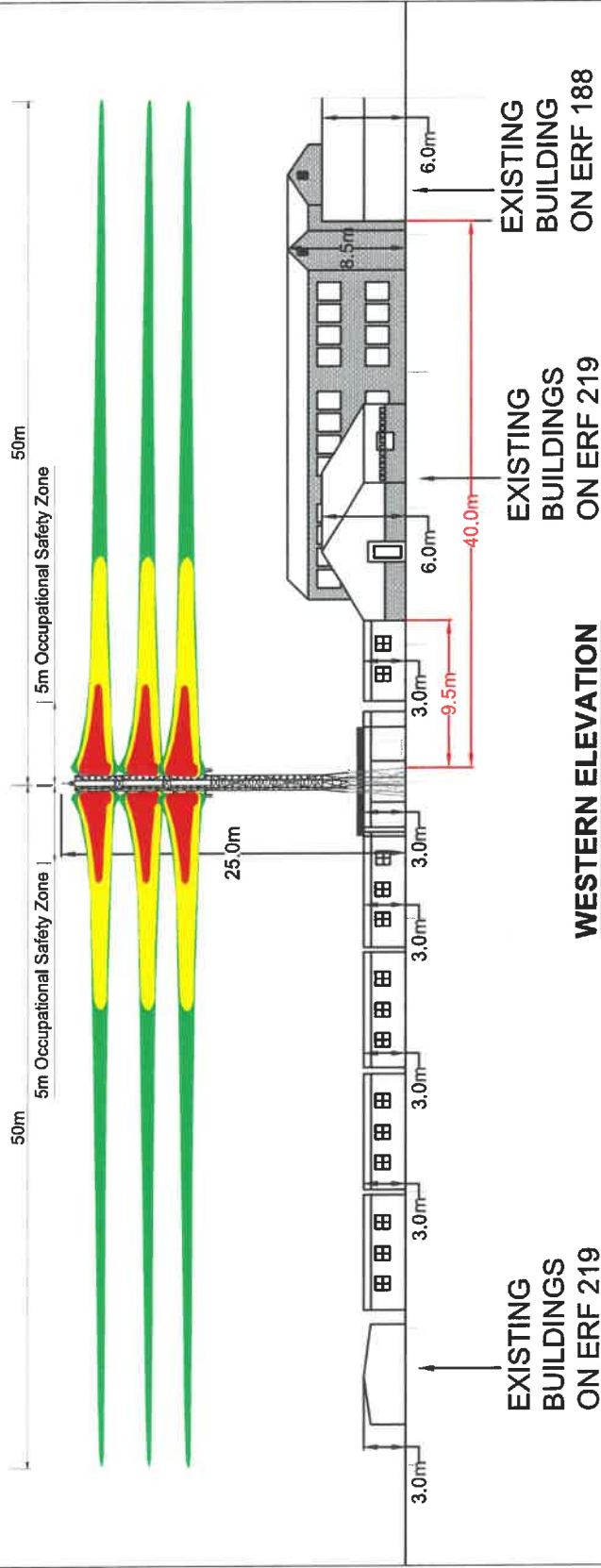
DATE	DESCRIPTION	REVISION
18-09-2024	1st issue	0
07-11-2024	Change design	1
06-03-2025	Additional Information	2

DRAWING NUMBER: ATS-1598  
SHEET: 8 OF 12

DRAWING TITLE:  
PUBLIC SAFETY ZONE ELEVATION

DRAWN: D. LOOTS  
SCALE: 1:500  
DATE: 2025-03-06  
REVISION: 2

# Public Safety Zone Elevations



SBA TOWERS SITE ID: ATSA1598  
 SBA TOWERS SITE NAME: LUKHANYO PRIMARY SCHOOL  
 PROPERTY DESCRIPTION:

ERF 219, ZWELIHLE

ADDRESS: LUSIBA STREET, ZWELIHLE, WESTERN CAPE

CO-ORDINATES: ELEVATION: 20m  
 Lat: -34.430732°  
 Long: 19.211052°



TOWN AND REGIONAL PLANNING CONSULTANTS  
 1st Flr, 152 SACS  
 Main Building, Bridgeway,  
 Century City, Cape Town  
 7448

PROJECT: PROPOSED NEW SBA TOWERS 25m LATTICE MAST WITH 44m² BASE STATION

APPROVED MAST: 25m LATTICE MAST

NOTES:  
 A) NEW 25m LATTICE MAST  
 B) 5.5m x 8.0m BASE STATION  
 C) 3.0m HIGH WALL WITH 500mm PALISADE FENCE AND RAZOR COIL ON TOP  
 D) BASE STATION: CHIP STONE SURFACE

DATE	DESCRIPTION	REVISION
18-09-2024	1st Issue	0
07-11-2024	Change design	1
06-03-2025	Additional Information	2

DRAWING NUMBER: ATSA1598  
 SHEET: 9 OF 12  
 DRAWING TITLE: PUBLIC SAFETY ZONE ELEVATION  
 SCALE: 1:500  
 DRAWN: D. LOOTS  
 REVISION: 2  
 DATE: 2025-03-06

Site Photos



SBA TOWERS SITE ID: ATSA1598

SBA TOWERS SITE NAME: LUKHANYO PRIMARY SCHOOL

PROPERTY DESCRIPTION:

ERF 219, ZWELIHLE

ADDRESS: LUSIBA STREET, ZWELIHLE, WESTERN CAPE

CO-ORDINATES: ELEVATION: 20m  
 Lat: -34.430732\*  
 Long: 19.211052\*



Tel: 081 563 8585  
 Fax: 081 537 8187  
 1st Flr, 2nd Floor,  
 Matrix Building, Bidwegway,  
 Century City, Cape Town  
 P.O. Box 182,  
 Century City,  
 7446

PROJECT: PROPOSED NEW SBA TOWERS 25m LATTICE MAST WITH 44m² BASE STATION

APPROVED MAST: 25m LATTICE MAST

NOTES:

- A) NEW 25m LATTICE MAST
- B) 5.8m x 8.0m BASE STATION
- C) 3.0m HIGH WALL WITH 500mm PALISADE FENCE AND RAZOR COIL ON TOP.
- D) BASE STATION: CHIP STONE SURFACE

DATE	DESCRIPTION	REVISION
18-09-2024	1st Issue	0
07-11-2024	Change design	1
08-03-2025	Additional Information	2

DRAWING NUMBER: ATSA1598  
 SHEET: 10 OF 12

DRAWING TITLE: SITE PHOTOS

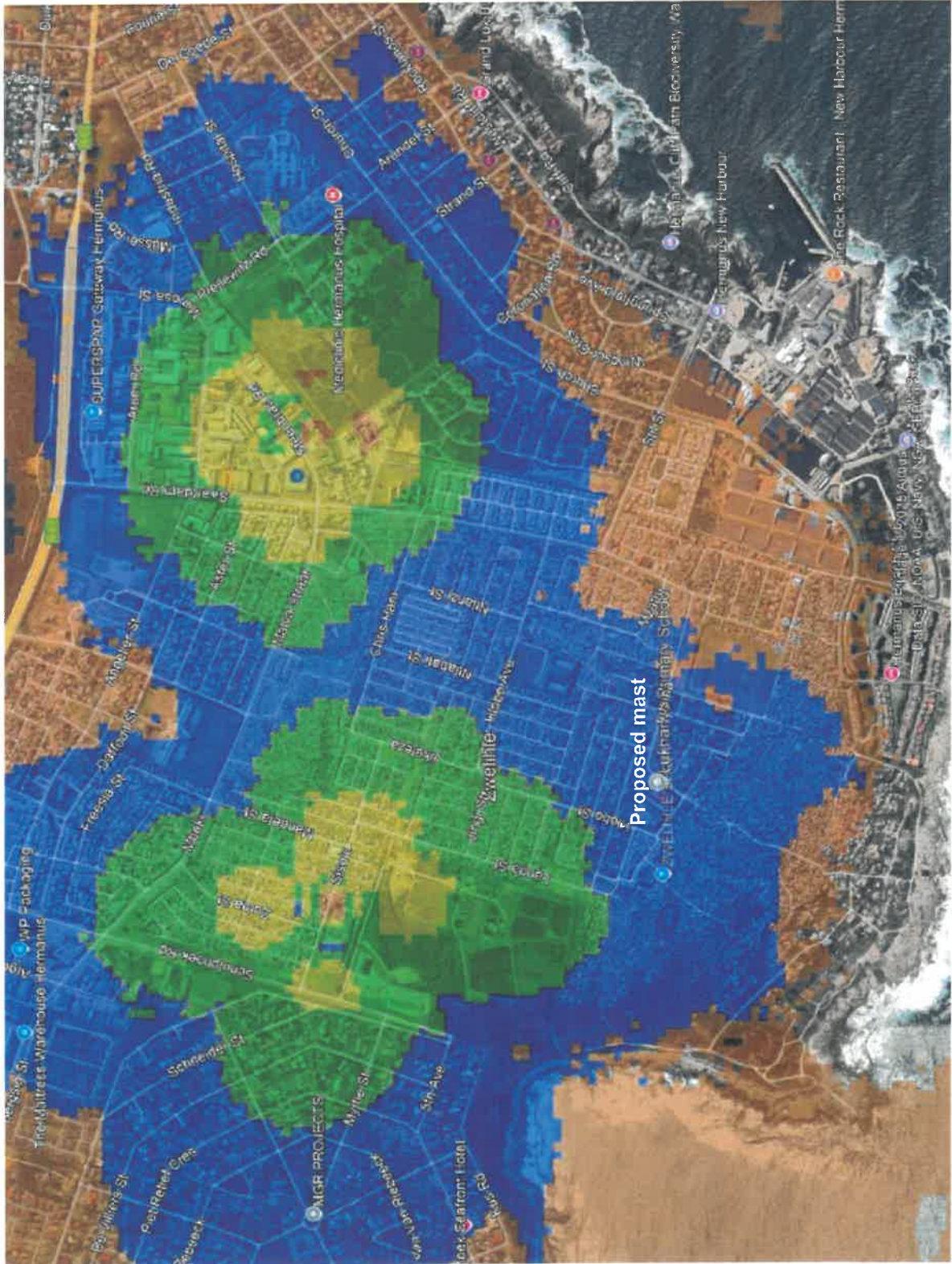
DRAWN: D. LOOTS

SCALE: NTS

DATE: 2025-03-06

REVISION: 2

Coverage Map



Coverage map without proposed mast on Erf 219 Zwelihle



**SBA TOWERS SITE ID:**  
ATSA1598

**SBA TOWERS SITE NAME:**  
LUKHANYO PRIMARY SCHOOL

**PROPERTY DESCRIPTION:**  
ERF 219, ZWELIHLE

**ADDRESS:**  
LUSIBA STREET, ZWELIHLE,  
WESTERN CAPE

**CO-ORDINATES:** **ELEVATION:**  
Lat: -34.430732\* 20m  
Long: 19.211052\*



**TOWN AND REGIONAL PLANNING CONSULTANTS**  
Unit H, 2nd Floor,  
Matrix Building, Bldgway,  
Century City,  
Century City, Cape Town 7448  
Tel: 021 552 6585  
Fax: 021 557 9187

**PROJECT:**  
NEW SBA TOWERS 25m LATTICE MAST  
WITH 44m<sup>2</sup> BASE STATION

**APPROVED MAST:**  
25m LATTICE MAST

**NOTES:**

- A) NEW 25m LATTICE MAST
- B) 15.0m x 8.0m BASE STATION
- C) 3.0m HIGH WALL WITH 500mm PALISADE FENCE AND RAZOR COIL ON TOP.
- D) BASE STATION: CHIP STONE SURFACE

DATE	DESCRIPTION	REVISION
18-09-2024	1st issue	0
07-11-2024	Change design	1
06-03-2025	Additional Information	2

**DRAWING NUMBER:** ATSA1598  
**SHEET:** 11 OF 12

**DRAWING TITLE:** COVERAGE MAP

**SCALE:** NTS  
**DRAWN:** D. LOOTS  
**REVISION:** 2  
**DATE:** 2025-03-06



**SBA TOWERS SITE ID:** ATSA1598  
**SBA TOWERS SITE NAME:** LUKHANYO PRIMARY SCHOOL  
**PROPERTY DESCRIPTION:** ERF 219, ZWELIHLE  
**ADDRESS:** LUSIBA STREET, ZWELIHLE, WESTERN CAPE  
**CO-ORDINATES:** **ELEVATION:**  
 Lat: -34.430732\* 20m  
 Long: 19.211052\*



**TOWN AND REGIONAL PLANNING CONSULTANTS**  
 11th Floor,  
 Main Building,  
 Century City,  
 Century City, Cape Town  
 Tel: 021 556 8855  
 Fax: 021 557 9187  
 P. Box 152,  
 Century City,  
 7446

**PROJECT:**  
 PROPOSED NEW SBA TOWERS 25m LATTICE MAST WITH 4m<sup>2</sup> BASE STATION  
**APPROVED MAST:**  
 25m LATTICE MAST

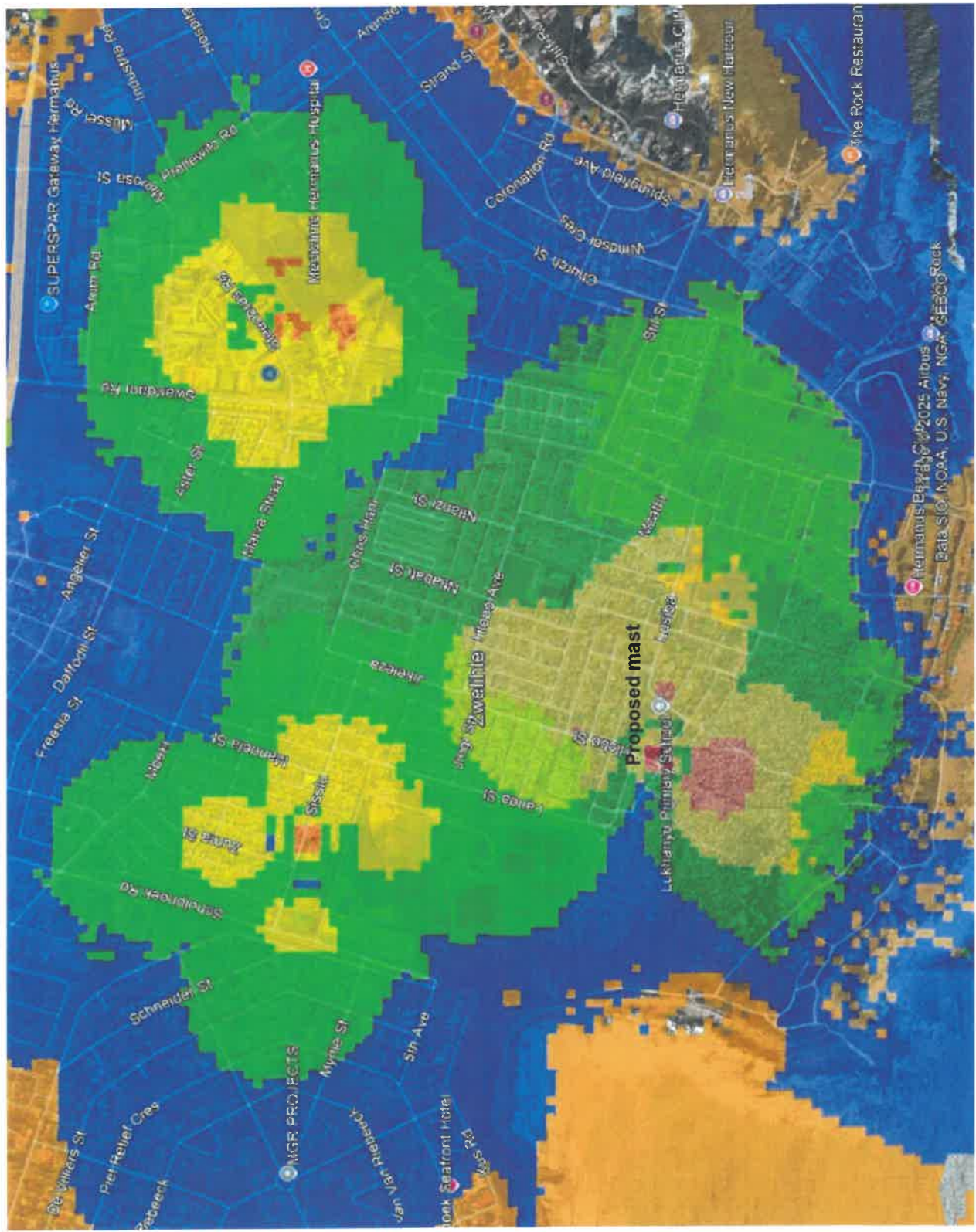
**NOTES:**  
 A) NEW 25m LATTICE MAST  
 B) 5.0m x 6.0m BASE STATION  
 C) 3.0m HIGH WALL WITH 500mm PALISADE FENCE AND RAZOR COIL ON TOP.  
 D) BASE STATION: CHIP STONE SURFACE

DATE	DESCRIPTION	REVISION
18-09-2024	1st Issue	0
07-11-2024	Change design	1
06-03-2025	Additional Information	2

**DRAWING NUMBER:** ATSA1598  
**SHEET:** 12 OF 12

**DRAWING TITLE:** COVERAGE MAP  
**SCALE:** NTS  
**DRAWN:** D. LOOTS  
**REVISION:** 2  
**DATE:** 2025-03-06

Coverage Map



Coverage map with proposed mast on Erf 219 Zwelihle

**COMMENTS FROM THE PROJECT MANAGEMENT DIVISION FOR:  
APPLICATION FOR CONSENT USE & DEPARTURE: ERF 219 (A PORTION OF  
ERF 316), ZWELIHLE (4881/2024)**

Stormwater (SW)	:	Refer to conditions
Electricity	:	Refer to conditions
Water	:	Refer to conditions
Sewer	:	Refer to conditions
Roads and traffic	:	Refer to conditions

**Conditions:**

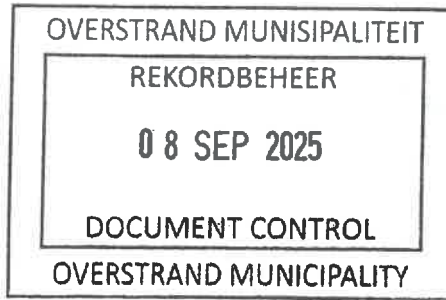
1. that only the existing water and sewerage connections will be available to the development, should larger capacity in any of these services be required, the upgrading will be at the owner's cost;
2. that only the existing electricity connection will be available for the development and that, should additional capacity be required, an investigation be conducted, with regard to the capacity required and that available, at the owner's cost;
3. that the developer investigate and determine the limitations of the site in terms of sewer drainage, subject to the minimum requirements of *SANS 10400 – P: 2010: Drainage*;
4. that, should any upgrading and/or development of the relevant sidewalks adjacent to the property be required as part of the development, application for such development be made to the office of the Principal Technologist: Hermanus for written approval;
5. that any additional and / or extended vehicle entrances will be for the owner's account;
6. that no reservation of on-street parking be allowed;
7. that stormwater discharged from higher lying properties and generated in the catchment area of the property be allowed to drain freely through the property;
8. that stormwater reticulation and connection(s) to the municipal system be provided at the owners cost, if required.



**RICARDO ANDREW  
PRINCIPAL TECHNOLOGIST:  
DEVELOPMENT CONTROL**



**DATE**



15 Bosmansdam Road  
Milnerton  
Cape Town  
7441

Sanet Botha  
Tel: 081 4093918  
Email: [WayleavesSR@Telkom.co.za](mailto:WayleavesSR@Telkom.co.za)

Our Ref.: WHMN 2632 25

6 September 2025

**OVERSTRAND MUNICIPALITY**

Dear Sir / Madam

**OPTIC FIBRE/COPPER PLANT AFFECTED**

WAYLEAVE: 63 LUSIBA STREET, ZWELIHLE

With reference to your application dated 22 August 2025.

FILE NO.	Erf 219-HZW
SCAN NO.	
COLLABORATOR NO.	2859646

As important **OPTIC FIBRE** cables are affected, please contact our representative **Melt van As** telephone number **081 3637873** at least 48 hours prior of commencement on construction work.

As per sketch attached, Openserve infrastructure will be affected, consequently the conditions below and on the attached legend will apply.

I hereby inform you that Openserve approves the proposed work indicated on your drawing in principle. This approval is valid for **6 months only**, after which reapplication must be made if the work has not been completed.

Any changes or deviations from the original planning during or prior to construction must immediately be communicated to this office.

Approval is granted, subject to the following conditions.

Telecommunication services position is shown as accurately as possible but should be regarded as approximate only.

Should alterations or relocation of existing infrastructure be required, such work will be done at the request and cost of the applicant.

Please notify this office within 21 working days from this letter of acceptance and if any alternative proposal is available or if a recoverable work should commence.

It would be appreciated if this office can be notified within 30 days of completion of the construction work. Confirmation is required on completion of construction as per agreed requirements.

**Should Openseve infrastructure be damaged while work is undertaken, kindly contact our representative immediately.**

All Open Serve rights remain reserved.

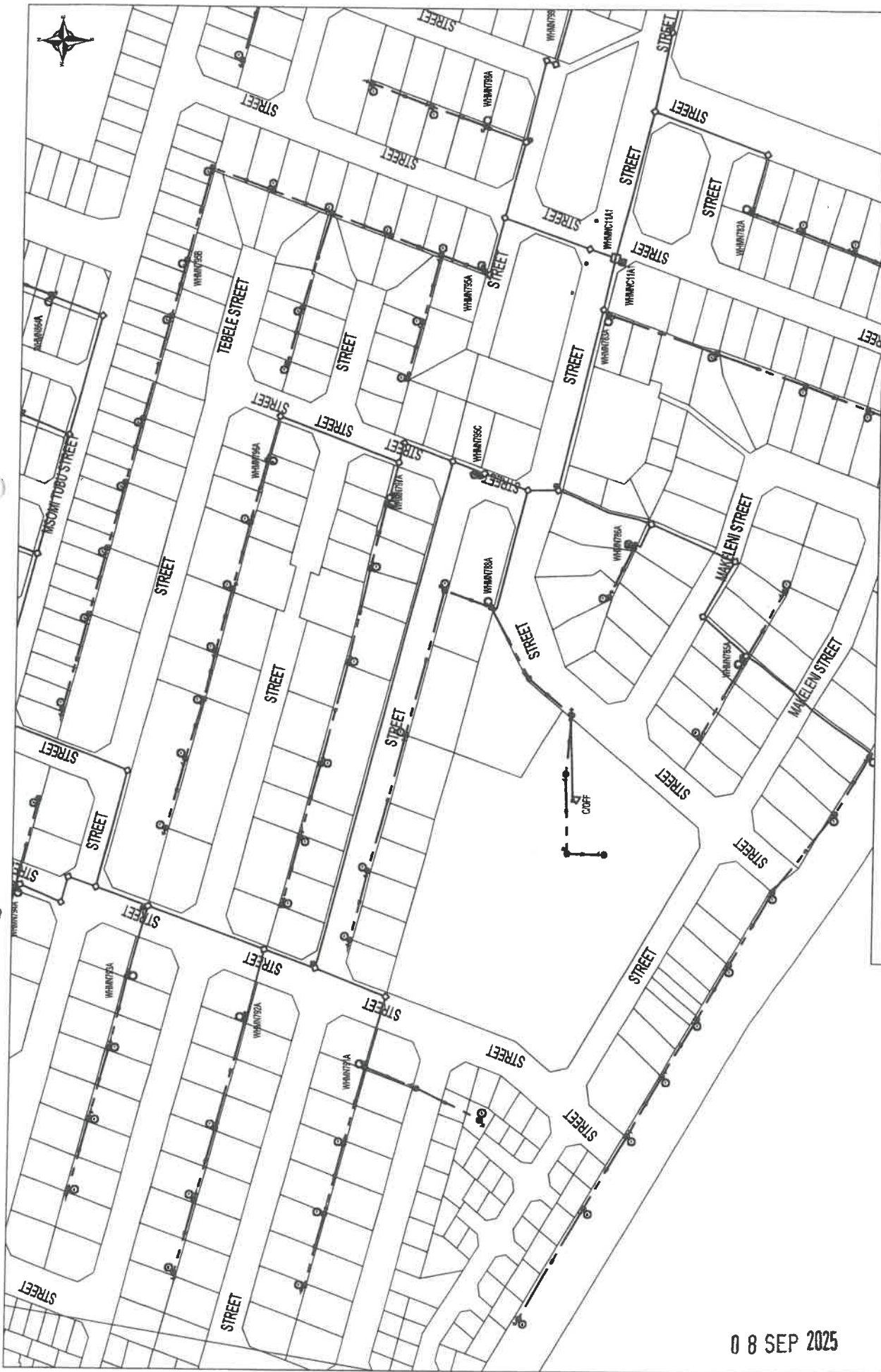
Yours faithfully



---

Sanet Botha

Wayleave Management: Western Region & Southern Region



Legend	
	Existing Manhole
	Planned Manhole
	To Be Recovered Manhole
	Existing Manhole Joint
	Planned Manhole Joint
	To Be Recovered Manhole Joint
	Existing P/B
	Planned P/B
	To Be Recovered P/B
	Existing SDC
	Planned SDC
	To Be Recovered SDC
	Existing DLC
	Planned DLC
	To Be Recovered DLC
	Existing Pole
	Planned Pole
	To Be Recovered Pole
	Existing Pole Street
	Planned Pole Street
	To Be Recovered Pole Street
	Existing Pole Alley
	Planned Pole Alley
	To Be Recovered Pole Alley
	Existing Pole Access Point
	Planned Pole Access Point
	To Be Recovered Pole Access Point
	Planned Overhead Route
	To Be Recovered Overhead Route
	Existing Underground Route
	Planned Underground Route
	To Be Recovered Underground Route
	Existing Overhead Route
	Planned Overhead Route
	To Be Recovered Overhead Route
	Condition Terminus (Virtual Element)



08 SEP 2025

Scale: 1:1517  
Date: 08/09/2025  
Created By: bohas

22 AUG 2025

[Support letter]

Loretta Gillion

Annexure F

**From:** Bonga Maku <bongamaku@gmail.com>  
**Sent:** Friday, 22 August 2025 11:41  
**To:** Loriaan Isaacs  
**Cc:** Loretta Gillion  
**Subject:** Re: Erf 219, 63 Lusiba Street, Zwelihle (Transmission Tower): Public Participation - You are regarded as a potentially affected property owner

Hi there,

I, the owner of ERF 221 Manzi Street Zwelihle, have no objection to the proposal.

Regards  
Bonga Maku

On Fri, Aug 22, 2025 at 11:00 AM Loriaan Isaacs <[loriaanisaacs@overstrand.gov.za](mailto:loriaanisaacs@overstrand.gov.za)> wrote:

To whom it may concern

**ERF 219 (A PORTION OF ERF 316), 63 LUSIBA STREET, ZWELIHLE, OVERSTRAND MUNICIPAL AREA: APPLICATION FOR CONSENT USE AND DEPARTURE: WARREN PETTERSON PLANNING ON BEHALF OF OVERSTRAND MUNICIPALITY**

You are regarded as a potentially affected property owner.

Attached please find a self-explanatory notice for your attention.

FILE NO.	Erf 219-HZW
SCAN NO.	
COLLABORATOR NO.	2850890

Sections 47 and 48 of the Overstrand Municipality Amendment By-Law on Land Use Planning, 2020 (By-Law) requires that notice must be given, and Section 49 allows for a period of not less than 30 days from the date on which notice was given to affected persons to submit comments, objections or representations in respect of a land use planning application. Council, during a meeting held on 30 November 2023, resolved that such notice be given via e-mail in accordance with the provisions of the Electronic Communications and Transactions Act, 25 of 2002. Due to ongoing difficulties in service delivery experienced by the South African Post Office, and as per the aforesaid Council resolution, **NO** registered mail/letters will be forwarded in the interim period.

Kindly regard this email as your formal notification of such land use application. Kindly provide your comment, objection or representations, if any, directly to Loretta Gillion ([loretta@overstrand.gov.za](mailto:loretta@overstrand.gov.za)) on or before **26 September 2025**.

Also note that the notice will be available at the Town & Spatial Planning Department, and on the municipal webpage at the following link: <https://www.overstrand.gov.za/en/documents/town-planning/land-use-planning-applications>

R 22 AUG 2025

Annexure G 1/2



**Western Cape  
Government**

Department of Environmental Affairs and Development Planning  
**Ntanganedzeni Mabasa**  
 Directorate: Development Management, Region 1  
 Ntanganedzeni.Mabasa@westerncape.gov.za | Tel: 021 483 2803

**REFERENCE: 16/3/3/6/1/E2/44/1545/23**

**DATE: 29 November 2023**

The Board of Directors  
 Warren Petterson Planning  
 Po Box 152  
**CENTURY CITY**  
 7446

**Attention: Mr. Dirko Loots**

Tel: (021) 552 5255  
 Email: dloots@wpplanning.co.za

Dear Sir

**APPLICABILITY OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) ("NEMA") ENVIRONMENTAL IMPACT ASSESSMENT ("EIA") REGULATIONS, 2014 (AS AMENDED) TO THE PROPOSED CONSTRUCTION OF A 25M HIGH MONOPOLE MAST AND ASSOCIATED INFRASTRUCTURE ON ERF NO. 219, ZWELIHLE (UNREGISTERED PORTION OF ERF NO. 316, ZWELIHLE).**

1. The electronic copy of the abovementioned documents dated 2 August 2023, as received by this Department on 17 October 2023, refer.
2. This letter serves as an acknowledgement of receipt of the correspondence by this Department.
3. According to the information contained in the correspondence, this Department notes the proposal entails the following:
  - 3.1 The construction of a 25m high monopole mast and associated infrastructure on Erf No. 219, Zwelihle (Unregistered Portion of Erf No. 316, Zwelihle).
  - 3.2 The total development footprint for the proposed project is approximately 20.8m<sup>2</sup>.
  - 3.3 Power is available on site.
  - 3.4 No sensitive environmental features are located on the site.
  - 3.5 The site is zoned Community Zone I and is located inside the urban area of Zwelihle.
4. Your attention is therefore drawn to the listed activities in terms of the NEMA EIA Regulations, 2014 (as amended) as defined in Listing Notices ("LN") 1, 2 & 3 of 7 April 2017. Be advised that the proposed construction of a 25m high monopole mast and associated infrastructure on a community zoned erf that is located inside the urban area of Zwelihle will not trigger any listed activity(ies) as defined in terms of the EIA Regulations, 2014 (as amended). Environmental Authorisation is therefore not required prior to the construction of a 25m high monopole mast and associated infrastructure on Erf No. 219, Zwelihle (Unregistered Portion of Erf No. 316, Zwelihle).
5. The above is based on the following:
  - 5.1 The mast will be located inside the urban area of Zwelihle.

- 5.2 The site is not zoned for use as public open space or equivalent zoning within urban areas.
6. Should any revision of the proposed development on the said erf trigger any listed activity(ies) as defined terms of Listing Notice 1, 2 & 3, an application must be submitted and environmental authorisation obtained before such activity(ies) may commence
  7. The applicant is reminded of his/her general duty of care and the remediation of environmental damage, Section 28(1) of NEMA specifically states that – "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment."
  8. Please further note that the proponent must comply with any other statutory requirements that may be applicable to the undertaking of the activity.
  9. The Department reserves the right to revise its comments and request further information from you based on any new or revised information received.

Yours faithfully

**Andrea  
Thomas**

Digitally signed by  
Andrea Thomas  
Date: 2023.11.29  
12:56:12 +02'00'

ppHEAD OF COMPONENT

**ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 1  
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

CC: (1) Schalk van der Merwe (Overstrand Municipality)

Email: svdmerwe@overstrand.gov.za



## Department of Health

Directorate: Radiation Control  
Private Bag X62  
BELLVILLE  
7535

☎: 021 957 7483  
Fax: 021 946 1589  
E-mail: [Leon.DuToit@sahpra.org.za](mailto:Leon.DuToit@sahpra.org.za)

Enquiries: LL du Toit  
Date: 8 September 2020

### To whom it may concern

#### HEALTH EFFECTS OF CELLULAR BASE STATIONS AND HANDSETS

The Directorate: Radiation Control was the section within the National Department of Health that was responsible, from the viewpoint of human health, for regulating electronic products producing **non-ionising** electromagnetic fields (EMF), i.e. where the frequency of such EMF is less than 300 GHz. The Directorate Radiation Control has since been transferred to the South African Health Products Regulatory Authority (SAHPRA). In carrying out its responsibility, the Directorate has been utilising the World Health Organization's (WHO) International EMF Project ([www.who.int/peh-emf/en/](http://www.who.int/peh-emf/en/)) as its primary source of information and guidance with respect to the health effects of EMF. The International EMF Project was established by the WHO in 1996 to (i) assess the scientific evidence for possible adverse health effects of non-ionising electromagnetic fields on an on-going basis, (ii) initiate and coordinate new research in this regard, and (iii) compile health risk assessments for different parts of the electromagnetic spectrum. The Department of Health has been a member of the International Advisory Committee of the International EMF Project since 1998.

In June 2005 the International EMF Project hosted a workshop that was specifically aimed at considering the possible health consequences of the emissions from cellular base stations and wireless networks. The findings of this workshop were summarised in a 2-page Fact Sheet (<http://www.who.int/peh-emf/publications/facts/fs304/en/>). The following extract from this Fact Sheet is still considered by the WHO as a summary of the findings to date, i.e. ***“Considering the very low exposure levels and research results collected to date, there is no convincing scientific evidence that the weak RF signals from base stations and wireless networks cause adverse health effects.”***

Another WHO Fact Sheet was published in June 2011 and reviewed in October 2014, i.e. *Electromagnetic fields and public health: mobile phones*. This Fact Sheet can be found at

<http://www.who.int/mediacentre/factsheets/fs193/en/>) and the conclusion is stated as follows:

***“A large number of studies have been performed over the last two decades to assess whether mobile phones pose a potential health risk. To date, no adverse health effects have been established as being caused by mobile phone use.”***

The WHO recommends utilising internationally recognised exposure guidelines such as those that were published in 1998 by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) and reconfirmed in 2009. The 1998 guidelines were replaced by the updated 2020 version for the frequency range 100 kHz – 300 GHz (i.e. including all the frequencies employed by the cellular industry). The Department of Health likewise recommends the use of these ICNIRP guidelines to protect people against the known adverse health effects of EMF.

The numerous measurement surveys, which have been conducted around the world and in South Africa, have shown that the actual levels of public exposure as a result of base station emissions invariably are only a fraction of the ICNIRP guidelines, even in instances where members of the public have been really concerned about their exposure to these emissions. At present there is no confirmed scientific evidence that points to any health hazard associated with the very low levels of exposure that the general public would typically experience in the vicinity of a cellular base station. The Department is therefore satisfied that the health of the general public is not being compromised by their exposure to the microwave emissions of cellular base stations. This also means that local and other authorities, in considering the environmental impact of any particular base station, do not need to and should not attempt, from a public health point of view, to set any restrictions with respect to parameters such as distance to the mast, duration of exposure, height of the mast, etc.

The Department of Health is not able to make any pronouncements about the specific levels of EMF that a member of the public would experience at any particular base station site when it is in operation. However, generally-speaking unless a person would climb to the top of a mast (or other structure supporting an antenna) and position him/herself not more than a few meters away right in front of the active antenna, such a person would have no real possibility of being exposed to even anywhere near the afore-mentioned ICNIRP guideline limits. Since these base stations are typically cordoned off by means of barbed wire fencing and locked gates/doors in order to protect the sensitive and expensive technology, getting to a mast and actually climbing it despite the afore-mentioned security measures would certainly not be considered responsible behaviour. Even then the only real threat to the health of the person would be falling at any height from the structure in question. Based on the results of numerous global and local surveys, the experience has been that the exposure to base station EMF at ground level is typically in the range of between 0.001 – 1.0 % of the

afore-mentioned ICNIRP guideline limits. Against this background of available data, there would be no scientific grounds to support any allegation that adverse health effects might be suffered by a responsible member of the public due to the EMF emitted by a base station.

Although the Department of Health currently neither prescribes nor enforces any compulsory exposure limits for electromagnetic fields, the Department does advise all concerned (whether they be a government department, the industry or the public) that voluntary compliance with the afore-mentioned ICNIRP exposure guidelines is the recommended and science-based way to deal with any situation involving human exposure to the non-ionising electromagnetic fields emitted by cellular base stations and handsets.

Yours sincerely,



**LL du Toit**  
DEPUTY DIRECTOR: RADIATION CONTROL