



ERF 707, 4 MAGNOLIA STREET, NORTHCLIFF, HERMANUS, OVERSTRAND MUNICIPAL AREA: APPLICATION FOR CONSENT USE, AMENDMENT OF AMENDMENT OF CONDITIONS IN RESPECT OF AN EXISTING APPROVAL & DETERMINATION OF AN ADMINISTRATIVE PENALTY: INTERACTIVE TOWN & REGIONAL PLANNERS ON BEHALF OF PRINSEVELD CC

Notice is hereby given in terms of Section 48 of the Overstrand Municipality Amendment By-Law on Municipal Land Use Planning, 2020 (By-law) of the following application, applicable to Erf 707, Hermanus, namely:

- **Consent Use** in terms of Section 16(2)(o) of the By-Law for a place of instruction namely a pre-school/ daycare centre.
- **Amendment of conditions of an existing approval** in terms of Section 16(2)(h) of the By-Law for the amendment of the sufficient parking required.
- **Determination of an administrative penalty** in terms of Section 16(2)(q) of the By-Law.

Full details regarding the proposal are available for inspection during weekdays between 08:00 and 16:30 at the Department: Town Planning, Paterson Street, Hermanus. Any comments must be in writing in accordance with the provisions of Sections 51 and 52 of the By-Law to reach the Municipality (16 Paterson Street, Hermanus / (f) 0283132093 / loretta@overstrand.gov.za) on or before **26 July 2024**, quoting your name, address and contact details, interest in the application, and the reasons for comment. Telephonic enquiries can be made to the **Town Planner, Mrs. H. van der Stoep** at 028-313 8900. The Municipality may refuse to accept comments received after the closing date. Any person who cannot read or write may visit the Town Planning Department where a municipal official will assist them in order to formalize their comment.

ERF 707, MAGNOLIA LAAN 4, NORTHCLIFF, HERMANUS, OVERSTRAND MUNISIPALE GEBIED: AANSOEK OM VERGUNNINGSGEBRUIK, WYSIGINGS VAN VOORWAARDES TEN OPSIGTE VAN 'N BESTAANDE GOEDKEURING EN BEPALING VAN 'N ADMINISTRATIEWE BOETE: INTERACTIVE STADS- EN STREEKSBEPLANNING NAMENS PRINSEVELD CC

Kennis word hiermee gegee ingevolge Artikel 48 van die Overstrand Munisipaliteit Wysigingsverordening vir Munisipale Grondgebruikbeplanning, 2020 (Verordening) dat die volgende aansoek, van toepassing op Erf 707, Hermanus, ontvang is, naamlik:

- **Vergunningsgebruik** ingevolge Artikel 16(2)(o) van die Verordening vir 'n onderrigplek naamklik 'n voorskoolse/ dagsorgsentrum
- **Wysigings van voorwaardes ten opsigte van 'n bestaande goedkeuring** ingevolge Artikel 16(2)(h) van die Verordening vir die wysiging van die voldoende parkering wat benodig word.
- **Bepaling van 'n administratiewe boete** ingevolge Artikel 16(2)(q) van die Verordening.

Volle besonderhede rakende die voorstel is beskikbaar vir inspeksie gedurende woensdae tussen 08:00 en 16:30 by die Departement: Stadsbeplanning, Patersonstraat 16, Hermanus. Enige kommentaar op die voorstel moet skriftelik wees in ooreenstemming met Artikels 51 en 52 van die Verordening en die Munisipaliteit (Patersonstraat 16, Hermanus / (f) 0283132093 / loretta@overstrand.gov.za) bereik voor of op **26 Julie 2024**, met u naam, adres en kontakbesonderhede, belang in die aansoek, sowel as die redes vir kommentaar. Telefoniese navrae kan gerig word aan die Senior **Stadsbeplanner, Mev. H. van der Stoep** by 028-313 8900. Die Munisipaliteit mag weier om kommentaar wat na die sluitingsdatum ontvang is, te aanvaar. Enige persoon wat nie kan lees of skryf nie kan die Departement Stadsbeplanning besoek waar hul deur 'n munisipale amptenaar bygestaan sal word ten einde hul kommentaar te formaliseer.

ISIZA 707, 4 MAGNOLIA STREET, NORTHCLIFF, HERMANUS, KUMMANDLA WOMASIPALA WASE-OVERSTRAND: ISICELO SOKUSEBENZISA, UKUTSHINTSWA KWEMIQATHANGO NGOKUMAYELA NOGUNYAZISO OSELE LUNIKEZELWE KUNYE NOKUGQITYWA KWESOHLWAYO: ABAKWA-INTERACTIVE TOWN & REGIONAL PLANNERS EGAMENI LABAKWA-PRINSEVELD CC

Kukhutshwa isaziso ngokumayela neCandelo 48 loMthetho Otshintshiweyo woMasipala waseOverstrand ongokuSetyenziswa Nokucetywa koMhlaba kaMasipala, 2020 (uMthetho kaMasipala), ukuba kufunyenwe isicelo esilandelayo ngokumayela neSiza 707, Hermanus ukuba:

- **Isicelo Sokusebenzisa** ngokumayela neCandelo 16(2)(o) loMthetho kaMasipala ukuze kwenziwe indawo yokufundisa ukutsho oko ikhrishi/ indawo yokucina abantwana.
- **Ukutshintshwa kwemiqathango kugunyaziso osele lunikezelwe** ngokumayela neCandelo 16(2)(h) loMthetho kaMasipala ukuze kubekho indawo yokupakha imoto eyaneleyo.
- **Ukugqitywa kwesohlwayo** ngokumayela neCandelo 16(2)(q) loMthetho kaMasipala.

linkcukacha ezipheleleyo mayela noku kucetyiweyo ziyafumaneka ukuze zihlolwe phakathi evekini phakathi ko-08:00 no-16:30 kwiSebe: Town Planning, Paterson Street, Hermanus. Nawaphi na amagqabaza okuhlomla amele abhalwe aze afakwe ngokuvumelana nezibonelelo zeCandelo 51 nezeCandelo 52 laloMthetho kaMasipala (16 Paterson Street, Hermanus / (f) 0283132093 / loretta@overstrand.gov.za) ngaphambi okanye **26 Julayi 2024**, ubhale igama lakho, idilesi neenkukacha zoqhagamshelwano, umdla kwisicelo nezizathu zokuhlomla. Imibuzo ngefowuni ingabuzwa ku**Mcebisi Dolophu uMrs. H. van der Stoep** ku 028-313 8900. UMasipala angangavumi ukwamkela amagqabaza okuhlomla afunyenwe emva komhla wokuvala. Nabani na ongakwazi kufunda okanye ukubhala angatyelela iSebe lokuCeba Idolophu apho igosa lakwamasipala liya kumnceda afake amagqabaza okuhlomla.

1. Introduction

<p>a. Brief</p> <p>Refer to Annexure B for the Power of Attorney.</p>	<p>Interactive Town and Regional Planning is appointed by the owner of the property Prinseveld Pty Ltd to prepare and submit an application for a consent use for a Place of Instruction on Erf 707, Hermanus as well as the amendment of conditions of approval in terms of the relevant legislation.</p>
<p>b. Background</p>	<p>As part of spatial planning provision should inter alia be made in an integrated and holistic manner for supporting community facilities on terms of the predominant land-uses of an area aligned with the dynamic nature of an urban environment and its needs.</p> <p>From the book "The Heart of our cities" written by Victor Greun, 1964 a city is described as <i>"The city is sum total of countless features and places, of nooks and crannies, of vast spaces and intimate spots, an admixture of the public and private domain, of rooms for work and rooms for living, of rooms for trade, where money and wares change hands, and rooms where music and drama lift the soul, of churches and night spots, of landmarks expressing the spirit of the community, and homes for the comfort of the individual."</i></p> <p>The application is for a medium scale pre-school / daycare centre. Children from the ages of 2 – 5 years are accommodated by the pre-school / daycare centre. The pre-school / daycare centre operates from 7:15 in the mornings to 16:00 in the afternoon on weekdays. Up to 20 children are proposed to be accommodated.</p> <p>The application area was previously used as a private school with students ranging from 10 to 17 years of age which included autistic student accommodation. We want to clarify that the previous private school and current pre-school / daycare centre are completely unrelated and has different owners, staff and children.</p> <p>An application was approved in 2005 to rezone the application area to Business Zone 3: Local Business to accommodate offices. The approval also prescribed parking provision. The 2005 approval reads as follows:</p> <p><i>"The Mayoral Committee has on 22 February 2005 resolved as follows:-</i></p> <ol style="list-style-type: none"><i>1. that the application for removal of restrictive clauses B(a), B(b), B(c) and B(d) from title deed T45931/2002 be forwarded to the Provincial Administration: Western Cape with the recommendation that it be approved;</i><i>2. that the application relating to erf 707, Hermanus for rezoning from General Residential Zone to Local Business Zone (offices), be approved, subject to the following conditions:</i><ol style="list-style-type: none"><i>(a) that the restrictive conditions be successfully removed, and</i><i>(b) that 9 parking bays as prescribed by the Town Planning Scheme be provided to the satisfaction of the Manager: Town Planning and Economic Development."</i>

c. Development Objective & Application Proposal	<p>The development objective is to legalise the existing pre-school / day care centre, on the application area.</p> <p>Subsequently to realize the above development objective, the following applications need to be made:</p> <ul style="list-style-type: none">• Consent Use for a Place of Instruction.• Amendment of the Conditions 2 and 2(b) of the 2005 approval to read as follows:<ul style="list-style-type: none">○ <i>“2. that the application relating to erf 707, Hermanus for rezoning from General Residential Zone to Local Business Zone (offices and place of instruction), be approved, subject to the following conditions:”</i>○ <i>“(b) that sufficient parking be provided in terms of the town planning scheme.”</i>• The determination of an administrative penalty.
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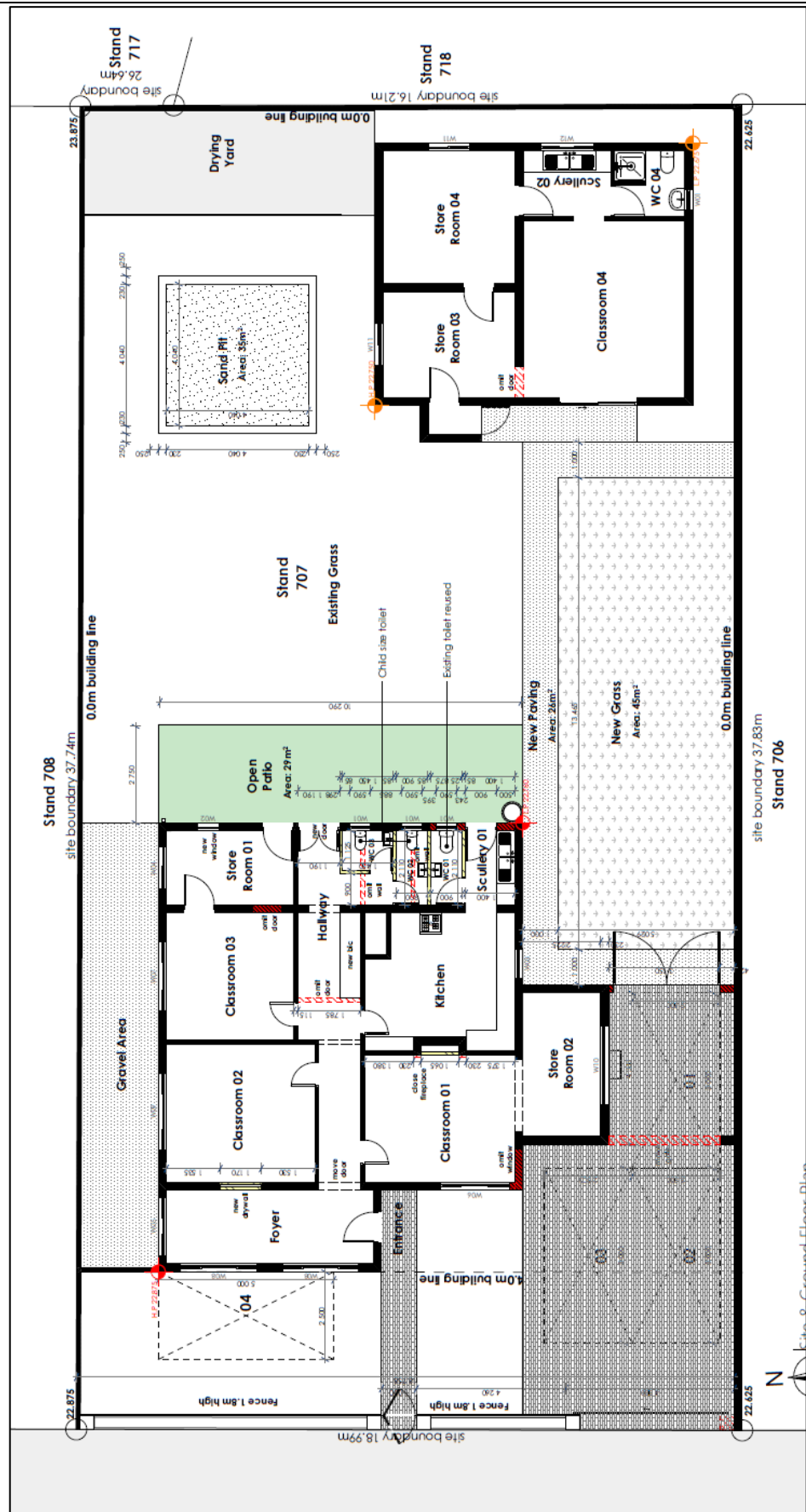


Figure 1: Site Plan

2. The Application

<p>a. Analysis: Title Deed</p> <p>Refer to Annexure D for the Conveyancer Certificate.</p>	<p>The conveyancer Amelia Galvin from Virtual Lawyers provided a conveyancer certificate confirming that no title deed conditions exists which restricts the development proposal.</p>				
<p>b. Analysis: Development Criteria:</p> <p>The development parameters for Erf 707 Hermanus as per the Overstrand Municipality Land use Scheme, 2020 are summarised as follows:</p>	<p>Parameters</p>	<p>Existing Zoning:</p>	<p>Proposal:</p>	<p>Comments</p>	
	<p>Zoning</p>	<p>Business Zone 3: Local Business</p>	<p>Business Zone 3: Local Business</p>	<p>Consistent</p>	
	<p>Primary Use</p>	<p>Shops, dwelling unit (above ground floor), flats (above ground floor), offices, restaurant, caretaker's accommodation and self-catering.</p>	<p>Offices</p>	<p>Consistent</p>	
	<p>Consent Uses</p>	<p>Bottle store, business premises, clinic, conference facility, dwelling unit (on ground floor, flats (on ground floor), town housing, tourist accommodation, hotel, institution, place of assembly, place of entertainment, place of instruction, place of worship, recreational facilities, residential building, sale of alcoholic beverages, service station, service trade and transmission apparatus.</p>	<p>Place of instruction</p>	<p>Application is for a consent use</p>	
	<p>Coverage</p>	<p>75%</p>	<p>29%</p>	<p>Consistent</p>	
	<p>Floor Factor</p>	<p>1.5</p>	<p>0.29</p>	<p>Consistent</p>	
	<p>Height</p>	<p>8.5m / 2 storeys</p>	<p>±5m / 1 storey</p>	<p>Consistent</p>	
	<p>Building lines</p>	<p>Street</p>	<p>0m</p>	<p>4m</p>	<p>Consistent</p>
		<p>Side</p>	<p>0m 3m where abutting another zone</p>	<p>1.4m south 2.3m north</p>	<p>Consistent</p>
		<p>Rear</p>	<p>0m 3m where abutting another zone</p>	<p>1m rear</p>	<p>Previously approved</p>
<p>Parking</p>	<p>Crèche, day care centre: One bay per 10 children</p>	<p>Crèche, day care centre: Up to 20 children proposed, thus 2 bays are required and 4 provided</p>	<p>Consistent</p>		
<p>c. Definitions</p>	<p>“place of instruction” means a place for education at pre-school, school or post-school levels (including a day care centre, a crèche, a farm school, a nursery school, a primary school, a secondary school, a college, a lecture hall, a university, a research institute, an environmental research or other educational centre) and associated uses such as boarding hostels or a civic facility for the promotion of knowledge to the community such as a convent, a monastery, a public library, a public art gallery or museum or a place of instruction in sport or other physical discipline where the main objective is instruction (as opposed to participation by the public sector as competitors or spectators) but excludes a reformatory, industrial school, commercial conference facility, institution, health centre or in-house business training centre;</p>				

<p>d. Application: The application form is attached as Annexure A.</p>	<p>Application is subsequently made in terms of the Overstrand Municipality Amendment By-Law on Municipal Land Use Planning, 2020 for the following:</p> <ul style="list-style-type: none">• <u>Consent Use</u> for a Place of Instruction in terms of Chapter IV, Section 16(2)(o).• <u>The amendment of conditions of approval</u>, Conditions 2 and 2(b) of the 2005, application number 4322 TP1-24/2004 approval in terms of Chapter IV, Section 16(h) to read as follows:<ul style="list-style-type: none">○ <i>“2. that the application relating to erf 707, Hermanus for rezoning from General Residential Zone to Local Business Zone (offices and place of instruction), be approved, subject to the following conditions:”</i>○ <i>“(b) that sufficient parking be provided in terms of the town planning scheme.”</i>• <u>The determination of administrative penalty</u> in terms of Chapter IV, Section 16(q).
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3. Contextual Site Information

a. Property Description	Property	Extent	Title Deed	Registered Owner
	Erf 707 Hermanus	714m ²	T45931/2002	Prinseveld Pty Ltd

The following Surveyor General Plans reflect the application site:

Refer to Annexure E for the SG Diagrams, Annexure C for the Title Deed of Erf 707 Hermanus.

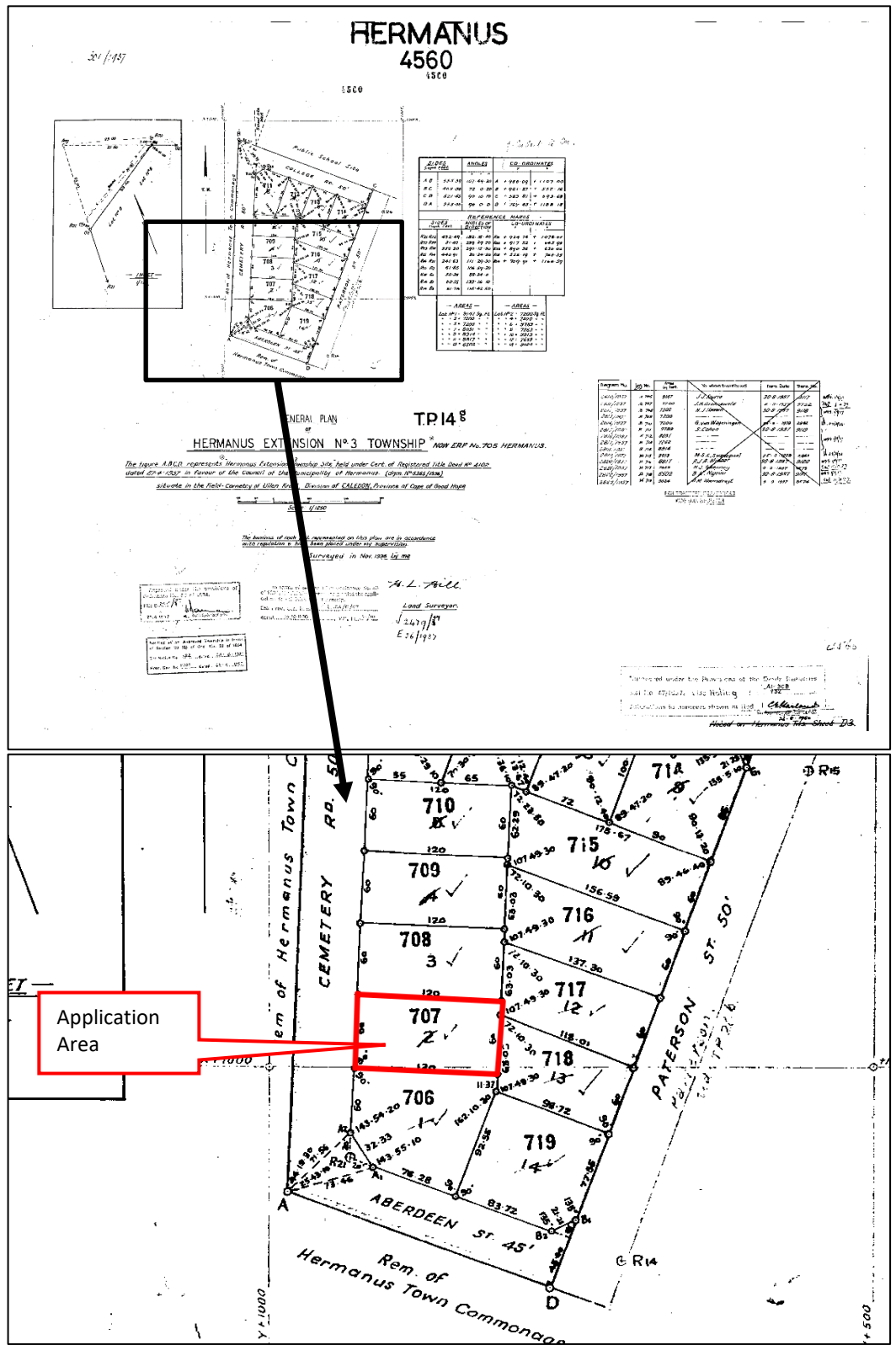


Figure 2: Extracts of the Surveyor General Plans of the application site

b. Location:

For the Locality Plans refer to Annexure F

Regional Context:

Within the regional context, the application area is located within Hermanus CBD, the main centre within the Overstrand municipal area.

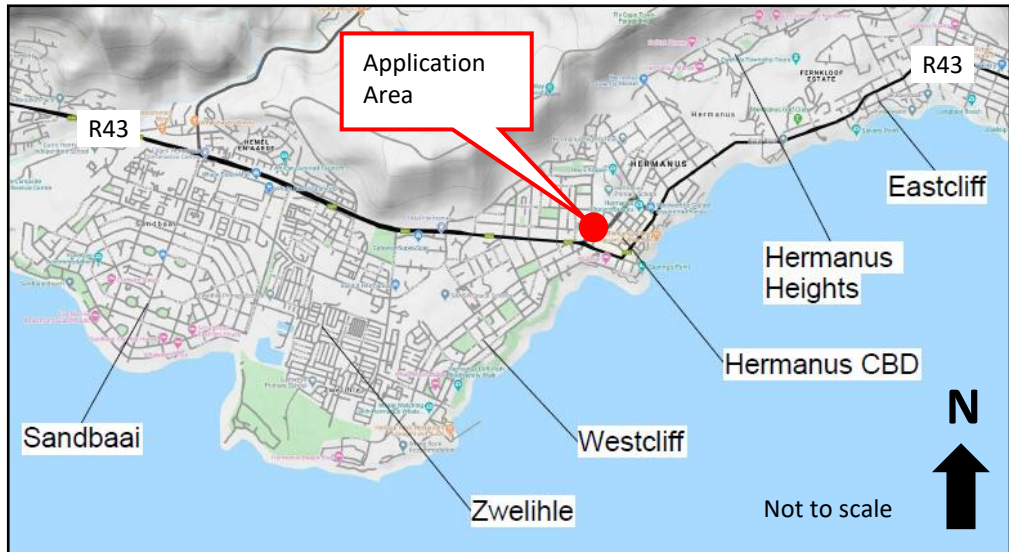


Figure 3: Locality Plan – Regional Context

Local Context:

Within the local context the application area consists of a business erf within the Hermanus CBD. The application area Erf 707 Hermanus is located at number 4 Magnolia Street.



Figure 4: Locality Plan – Local Context

c. Land Use: The application area is used for a place of instruction. The surrounding properties consist of business and municipal offices/authority. The Hermanus Primary School is 100m to the North. The area can be characterised as a mixed use area. The proposal for the building is for a place of instruction. The application proposal is **consistent** with the land-use of the area.

Refer to the Extract of Hermanus Zoning plan attached as **Annexure G.**

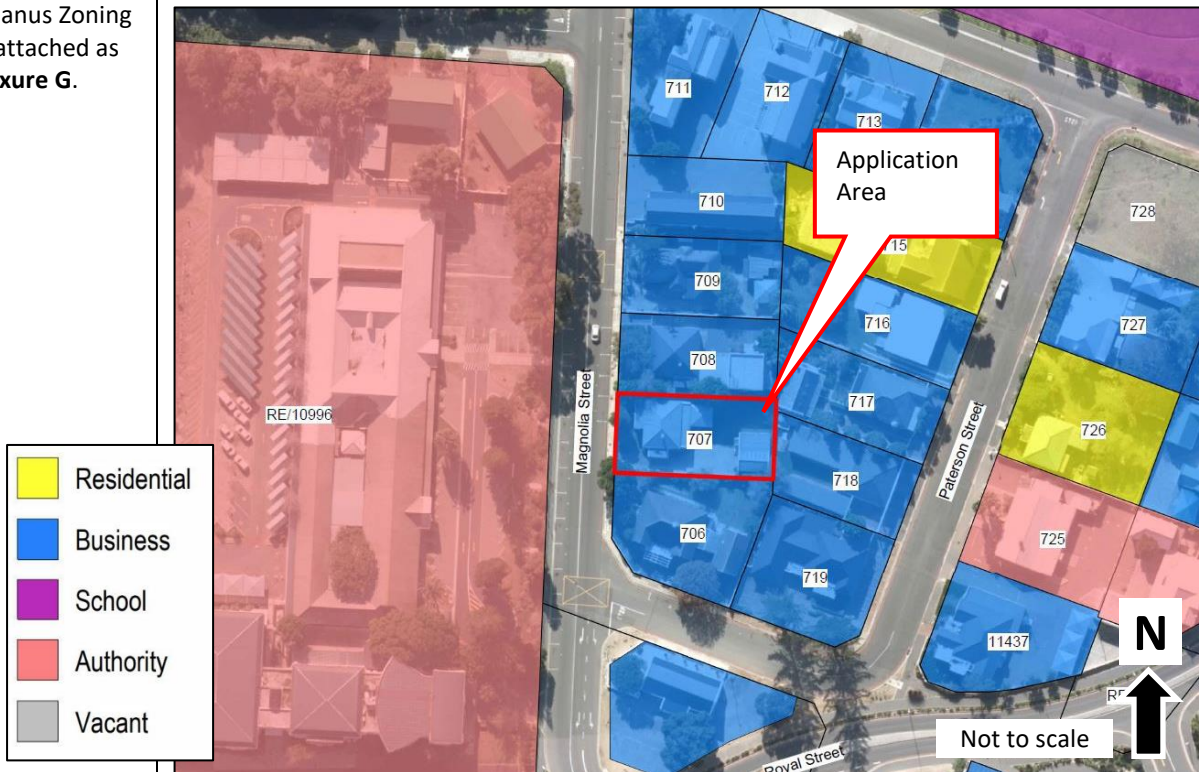


Figure 5: Google Image illustrating the residential land-use activities of the application area and surrounding properties

d. Zoning: The application area, Erf 707, Hermanus is zoned Business Zone 3: Local Business. The surrounding erven are zoned Business Zone 3: Local Business, Authority Zone: Authority Usage and General Residential Zone 1. The proposal is for Business Zone 3: Local Business with a consent use. The application proposal is considered **consistent** with the zoning of the area.

Refer to the Extract of Hermanus Zoning plan attached as **Annexure H.**

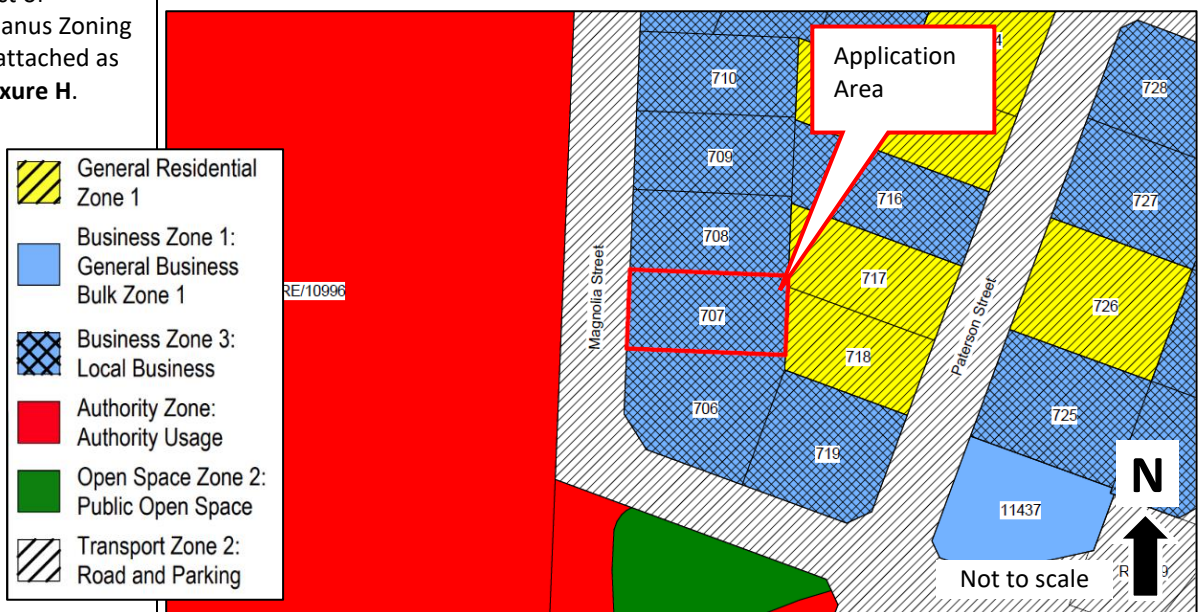


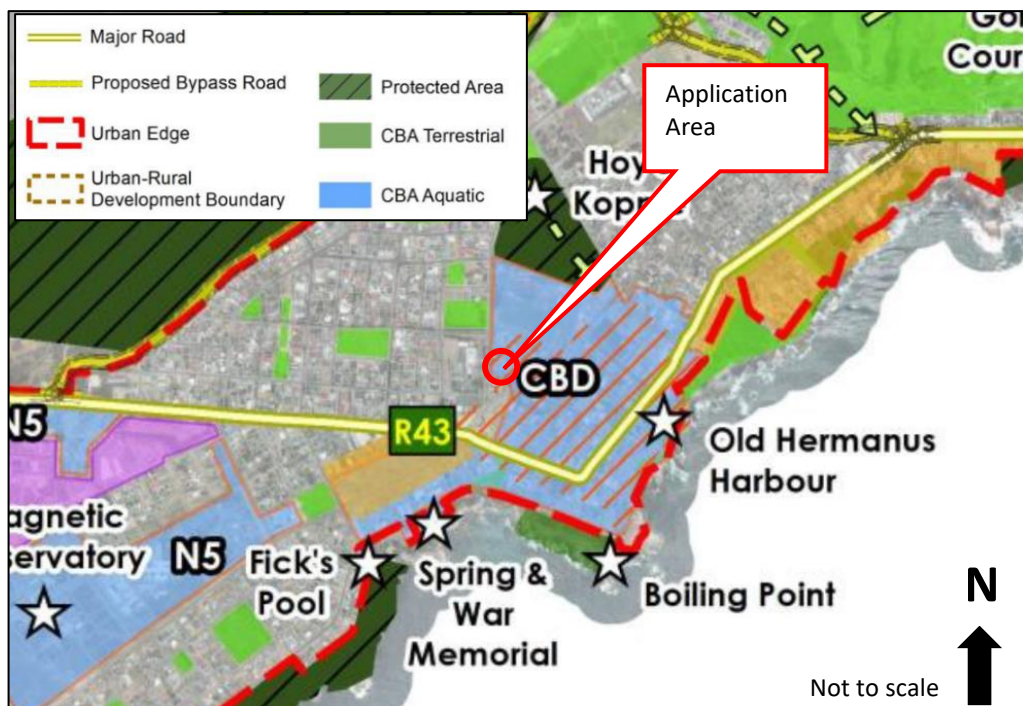
Figure 6: Zoning Plan extract

e. Laws and policies relevant to the consideration of the application and forward planning and land use documents

The following policy is applicable to the application area and the development proposal:

i. **Overstrand Municipal Spatial Development Framework, 2020**

The application area falls within the CBD as well as a heritage overlay area.



Management Approach

Commercial / Community Nodes



Central Business District

Business uses, commercial, retail and offices should be concentrated within the central business district and within the existing areas. High density residential uses should be promoted within the CBD area with supporting community facilities where appropriate.

Special Places



- New Hermanus Harbour
- Magnetic Observatory
- Fick's Pool
- Spring & War Memorial
- Old Hermanus Harbour
- Hoy's Koppie

- Preserve coastal walkway to Old Hermanus Harbour
- Public facility with regional significance
- Preserve and enhance public amenities.
- Preserve as part of the urban conservation and tourism area.
- Conserve and enhance the existing open space system.

Industrial



Industrial Development

Industrial activities within the Greater Hermanus area should be restricted to service and clean light industry.

Heritage



Heritage Areas / Overlay Zones

Compile a Heritage Management Plan for the demarcated precincts with heritage informed development guidelines.

Open Space / Linkages



Open Space Linkages

Protect and enhance open space corridors and linkages between the mountain and urban environments.

Figure 7: Spatial Development Framework 2020 Spatial Proposals Plan

2.8 OUR FACILITIES

Hermanus

Facilities	Additional Required 2021	Additional Required 2026	Additional Required 2031	Total Required
Small crèche/ Childhood Dev.Centre	3	3	6	12

5.8.2 2050 Vision: Greater Hermanus

LO 4 (ii) Buildings that accommodate community activities, as well as education, health and entrepreneurial development and business and skills training, should be located at points of highest access in urban settlements.

The application is consistent with the Overstrand Municipal Spatial Development Framework, 2020.

ii. Overstrand Municipality Growth Management Strategy, 2010 and draft 2020

The application area is within an area earmarked for densification for more than 30 dwelling units per hectare and is within a proposed economic opportunity area.

In terms of the 2010 Growth Management Strategy, one pre-school facility can be justified in in the location of the application site, Planning Unit 13. Presently no pre-school is located within this Planning Unit.

The application is consistent with the Overstrand Municipality Growth Management Strategy, 2010 and draft 2020.

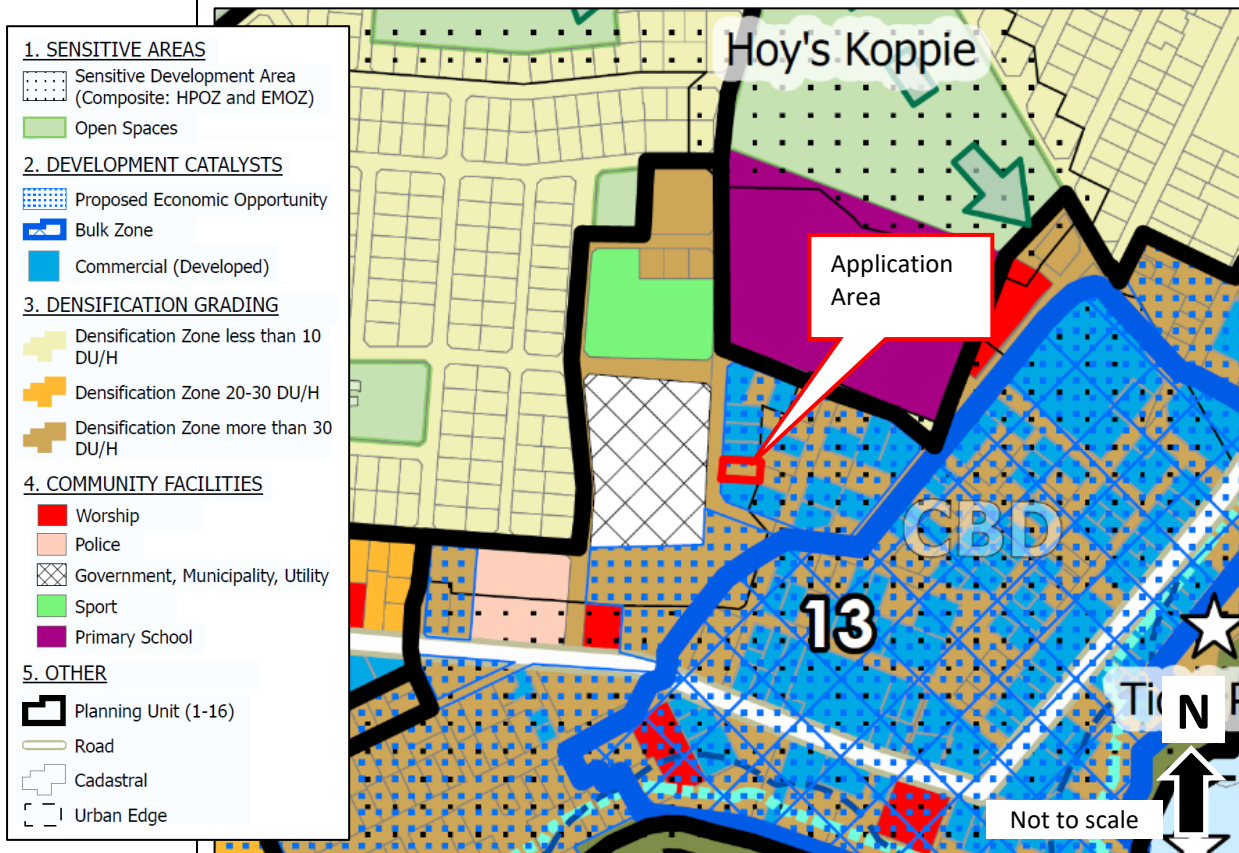


Figure 8: Extract from the Overstrand Municipality Growth Management Strategy, 2020 reflecting the envisaged land-uses for the area

iii. Overstrand Municipality Amendment By-Law on Municipal Land Use Planning, 2020

“90. Application for administrative penalty

- (1) A person who is in contravention of this By-Law, and submits an application to rectify the contravention, must apply to the Municipality for the determination of an administrative penalty, provided that the Municipality has not obtained and issued a demolition directive in terms of Section 85 in respect of the land or building or part thereof concerned.

- (2) A person making an application contemplated in Subsection (1) must –
- (a) submit an application;
 - (b) pay the prescribed fee;
 - (c) provide the information contemplated in Subsections (3); and
 - (d) comply with the duties of an applicant in Section 84.
- (3) The applicant must, to the satisfaction of the Municipality, provide the following information such as-
- (a) the nature, duration, gravity and extent of the contravention;
 - (b) the conduct of the person (allegedly) involved in the contravention;
 - (c) a report by a quantity surveyor in matters of unauthorised building/construction;
 - (d) whether the unlawful conduct was stopped; and
 - (e) whether the person allegedly involved in the contravention has previously contravened this By-Law or a previous planning law.”

iv. DEVELOPMENT PARAMETERS: A Quick Reference for the Provision of Facilities within Settlements of the Western Cape guideline document

The purpose of this guideline document is described as follows: *“The aim of this guideline is to provide relevant stakeholders with the various aspects that need to be taken into consideration when either putting together or assessing a development application in the Western Cape. The guideline sets out the various considerations which need to be taken into account when providing for a facility within a settlement. It considers locational requirements, general standards applicable to the facility, the required threshold population densities and accessibility concerns that need to be taken into consideration when planning for the provision of a facility.”*

Important and relevant to the application, it is noted in the said document that *“In line with the need to promote compact settlements and to reduce the need for motorised travel, where appropriate, multi-functionality of space must be promoted at both the facility and the land use scale. Generally, facilities should be placed on some form of activity node or corridor, depending on its place in the hierarchy of facilities. For example, a lower order facility – such as an Early Childhood Development Centre - will have a lower threshold and smaller range and therefore be placed at a fairly localised node or activity corridor with primarily localised access. Conversely, a higher order facility – such as a University - would have a higher threshold and large range and therefore be placed at a higher-order activity spine or corridor, with a high degree of access.”*

The following extract of this guideline document provides relevant criteria for a pre-primary school:

PRE-PRIMARY SCHOOLS AND EARLY CHILDHOOD DEVELOPMENT CENTRES



DESCRIPTION

A Pre-Primary School or Early Childhood Development Centre can be defined as a facility which provides for the care of, learning and support for babies and/or young children. This includes a day-care centre, crèche, nursery school and aftercare centre.



LOCATIONAL CRITERIA

A Large-Scale ECD Centre (25 children and more) should be located adjacent to public open spaces, schools, churches and other community facilities, on main access roads. In terms of the Policy, this clustering promotes sharing of parking, maximises access and confines the traffic impact to a defined area.

A Medium-Scale ECD Centre (10 - 24 children), on the other hand, can be located on or close to a local access road and should be incorporated into the local area without detrimentally affecting its character. The operator is required to reside on the premises and the residential appearance of the building is to be retained to a standard that does not detract from the residential character and streetscape of the surrounding area.

A Small-Scale ECD Centre (less than 10 children) can be located within a dwelling house on or close to a local access road and should be incorporated into the local area without detrimentally affecting its character. The operator is required to reside on the premises and the residential appearance of the building is to be retained to a standard that does not detract from the residential character and streetscape of the surrounding area.



SITE CRITERIA

Site size considerations are the following:

- The absolute minimum facility size (building footprint, not erf size) is to be 130m² in totality.
- At least 1.5m² of space should be available per child the facility serves.
- The building size of a large-scale ECD Centre should be at least 300m² to 500m².
- The general rule of thumb to determine facility size is to provide 0,15m² per person of the residential population being served (e.g. if the residential population is 6000 people, then the ideal facility size would be 900 m²).
- One third (33.33%) of the total area of the building to be used for circulation, administration and ancillary uses.



ACCESSIBILITY, DISTANCE AND SITE SPACING CRITERIA

Ideally, an ECD within a maximum of **750 metres** or **15 minute** walk time of its users.



POPULATION THRESHOLD CRITERIA

The following sets out the number of people / dwelling units that will justify the need for ECD:

- **2400 people (600 dwelling units)** for low income areas.
- **3600 people (900 dwelling units)** for high income areas, where a demand has been warranted.

Cautionary note: The provision of an ECD is highly dependent on the community profile. As a general rule of thumb, 40% of the children the age group (1 – 5) should be provided for.



OTHER CRITERIA FOR CONSIDERATION

- All facilities must comply with National Health and Safety regulations.
- In lower income communities: preferably within walking distance and on the route taken by older children walking to school.
- Noise factor to be taken into account when clustering facilities.
- A drop off area must be provided for parents, taxi's and busses, particularly in residential areas.
- All sites must be of acceptable proportion and gradient.
- Parking must be provided in larger ECD centres for at least the minimum staff contingent.

4. Motivation

Motivation for the application:

Refer to Annexure I for the Building Plan

a. Introduction and Background

The purpose of this application is to acquire the required land-use rights to legally operate a small-scale pre-school / daycare centre aimed at children whose parents predominantly work in the central areas of Hermanus.

An application for the subject property was approved in 2005 to rezone the application area to Business Zone 3: Local Business to accommodate offices. The approval also prescribed parking provision. The 2005 approval reads as follows:

“The Mayoral Committee has on 22 February 2005 resolved as follows:-

1. *that the application for removal of restrictive clauses B(a), B(b), B(c) and B(d) from title deed T45931/2002 be forwarded to the Provincial Administration: Western Cape with the recommendation that it be approved;*
2. *that the application relating to erf 707, Hermanus for rezoning from General Residential Zone to Local Business Zone (offices), be approved, subject to the following conditions:
(a) that the restrictive conditions be successfully removed, and
(b) that 9 parking bays as prescribed by the Town Planning Scheme be provided to the satisfaction of the Manager: Town Planning and Economic Development.”*

Children thrive in a structured and orderly environment and subsequently the pre-school / daycare centre has a well-structured program and routines which is continuously actively managed.

The children has full time supervision. Sufficient staff is proposed to ensure that children can receive sufficient personal attention.

The application area presently accommodates a pre-school / day care centre for children between the ages of 2 – 5 years. It is envisage to restrict the number of children to 20 and to be accommodated within 4 classrooms with a teacher for each class. The school is proposed to operate from 7:15 in the mornings to 16:00 in the afternoon on weekdays only.

According to the general day programme, the indoor activities consist of 70% of the time and outside activities 30% of the time of which the most of the outside time is programmed for between 14h00 and 16h00. The programme due to the age differences, provision is also made that not more than 2 classes (i.e. maximum 10 children) will be outside at a time.

Presently the Overstrand Municipality does not have a specific spatial policy for the accommodation and location of places of instruction (i.e. pre-schools / day care centres), however a Western Cape guideline the “DEVELOPMENT PARAMETERS: A Quick Reference for the Provision of Facilities within Settlements of the Western Cape” and will be used as format for the motivation of the subject application.

In summary the following three overarching aspects are considered as the main points of consideration for assessing applications for pre-schools / day care centres:

- a. The scale of the facility,
- b. The desirability of the facility in terms of the appropriateness of its location, and
- c. The impact on the surrounding area.

b. The proposal

The proposal is for a medium scale pre-school / day care centre of not accommodating more than 20 children.

The application objective is to legalise the existing pre-school / day care centre.

In order to legalise the existing pre-school / day care centre, application is for the following will be applicable:

- A consent Use for a Place of Instruction and the

- An amendment of the Conditions 2 and 2(b) of the 2005 approval to read as follows:
 - “2. that the application relating to erf 707, Hermanus for rezoning from General Residential Zone to Local Business Zone (offices and place of instruction), be approved, subject to the following conditions:”
 - “(b) that sufficient parking be provided in terms of the town planning scheme.”

c. The Motivation

i. Overarching Principles

The motivation is dealt with under the main headings of the scale, desirability and impact of the facility.

The following sketch illustrate the composition and planned layout of the facility:

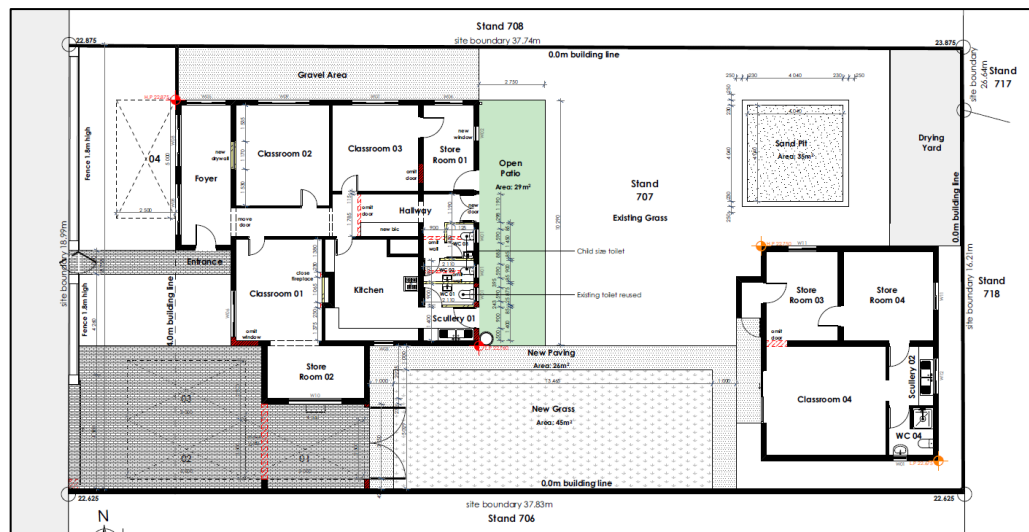


Figure 9: Site Plan

a. The Scale of the pre-school / day care centre

The scale of such a facility is one of the main informing factor for the placement of such facilities. Medium scale facilities of this nature can be accommodated within local areas.

However, this small scale facility is located within a business area adjacent and opposite offices, a laundry and a welfare facility with a collector road directly abutting and in the vicinity of the subject erf. The Hermanus Primary School is also located less than 150m from the application site. These uses generate substantial activity, movement and noise during office hours.

Given the scale of the facility and taking into consideration that less than 3 hours per day the maximum of 10 children under control of teachers will be outside the surrounding uses, the impact will be low.

b. The desirability of the facility in terms of the appropriateness of its location

The desirability of a pre-school / day care centre is one of the vital components of a normal urban holistic environment.

As previously mentioned in the report, in terms of the Overstrand Municipal Growth Management Strategy, 2010 a pre-school is encouraged within the specific planning unit (Planning Unit 13) in which the subject application site is located.

The need for such facility is self-evident for parents of young children working in the business area and surrounding areas of Hermanus and also making use of public transport via the taxi rank.

The premises is also located in close proximity (±150m) of the Hermanus Primary School and located on a collector route.

The location of the application site adheres to the principle of ensuring a well-distributed network of facility as a means of maximising accessibility. The following map illustrate the location and subsequently the function of such facility within a general area:

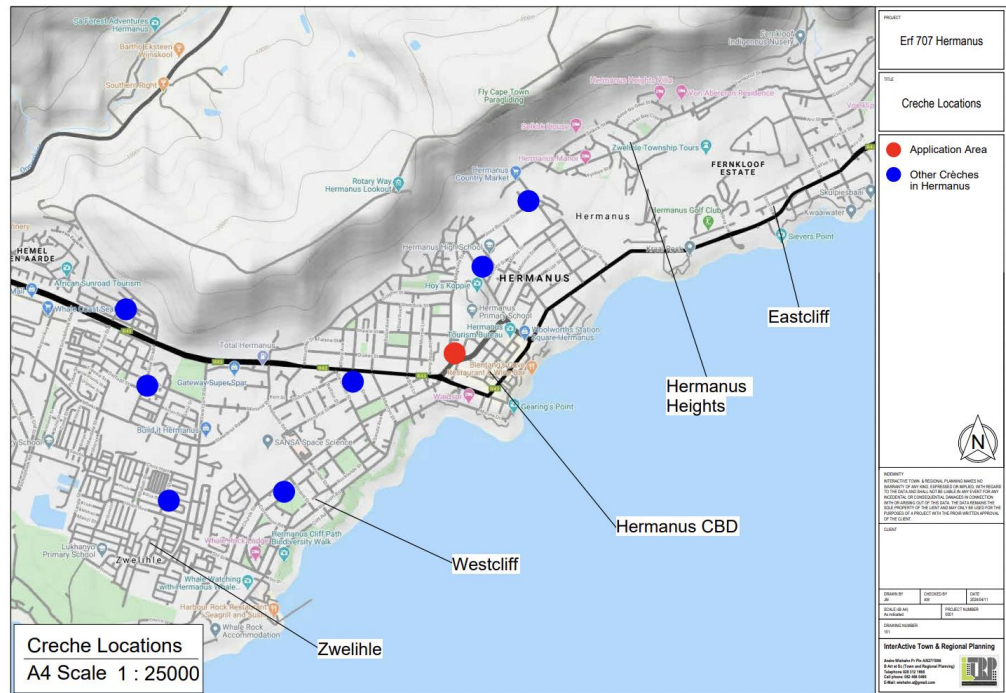


Figure 10: Crèche Locations

The need of such facility within the business area is subsequently justifies from many perspectives including the municipalities own spatial policy.

c. The impact on the surrounding area.

When considering this point of motivation consideration should be taken from the previous two motivational points of scale and desirability.

In a central business area a large facility of more than 24 children in terms of other town planning schemes and the draft Provincial guideline document “DEVELOPMENT PARAMETERS: A Quick Reference for the Provision of Facilities within Settlements of the Western Cape” is supported.

ii. Motivation in terms of the Provincial Development Guideline Parameters

The following part of the motivation involves the specific points of development parameters for pre-primary schools and early childhood development centres.

a. Locational Criteria

The location for the pre-school / daycare centre was chosen to be close and within walking distance to the primary school as well as the Hermanus central business area in order to be convenient for working parents. It is also often that parents with a child in pre-school has another child or children in the nearby primary school which is convenient to drop of the children close to each other.

In terms of the locational criteria Provincial guideline document “DEVELOPMENT PARAMETERS: A Quick Reference for the Provision of Facilities within Settlements of the Western Cape, a medium-Scale pre-school can be located close to a local access road and should be incorporated into the local area without detrimentally affecting its character. The operator is required to reside on the premises and the residential appearance is to be retained to a standard that does not detract from the residential character and streetscape of the surrounding area.

In this scenario this medium-scale school (i.e maximum 20 children) is not in a residential area but within a the transitional area from residential to businesses, however it is located on a access road. The general appearances of the directly abutting properties are still residential of nature as is evident from the following photograph:



Figure 11: Photograph from the road

The premises is in close proximity of the Hermanus Primary school and municipal offices on a main access road with substantial street parking in compliance with the requirements of a large-scale pre-school.

Subsequently it is considered that the medium-scale pre-school complying with the requirements of a large-scale pre-school is consistent with this criteria of location.

b. Site Criteria

The following site criteria in terms of the Provincial guideline document “DEVELOPMENT PARAMETERS: A Quick Reference for the Provision of Facilities within Settlements of the Western Cape is applicable:

- The absolute minimum facility size (building footprint, not erf size) is to be 130m² in totality.
- At least 1.5m² of space should be available per child the facility serves.
- The building size of a large-scale ECD Centre should be at least 300m² to 500m².
- The general rule of thumb to determine facility size is to provide 0,15m² per person of the residential population being served (e.g. if the residential population is 6000 people, then the ideal facility size would be 900 m²).
- One third (33.33%) of the total area of the building to be used for circulation, administration and ancillary uses.

First of all, the footprint of the building of 205m² exceeds the minimum total size for a pre-school.

The proposed 20 children will require 30m² and subsequently exceed this requirement.

The building size of the building as previously mentioned is 205m² which is not compliant with a large pre-school, however, a large pre-school is not proposed but a medium scale school and is therefore considered sufficient.

Based on the size of the planning unit in terms of Overstrand Municipal Growth Management Strategy, 2010 the estimated population of the planning unit is 660 people thus a facility of almost 100m² would be required. Given that people bringing their children from all over Hermanus bring their children to the Hermanus Primary School, it is estimated that the existing school of 205m² will be consistent with the size of the building.

The area for circulation, administration and ancillary uses is calculated at 285m² which is also consistent with the said guidelines.

c. Accessibility, Distance and Site Spacing Criteria

The application site enjoys exceptionally good access. The mentioned guidelines advise that ideally, a pre-school facility to be within a maximum of 750 metres or 15 minute walk time of its users.

In the following sketch a circle of 750m radius around the application site is shown. No other pre-school is located within this radius and accessibility is augmented by the general taxi rank located within this 750m radius.

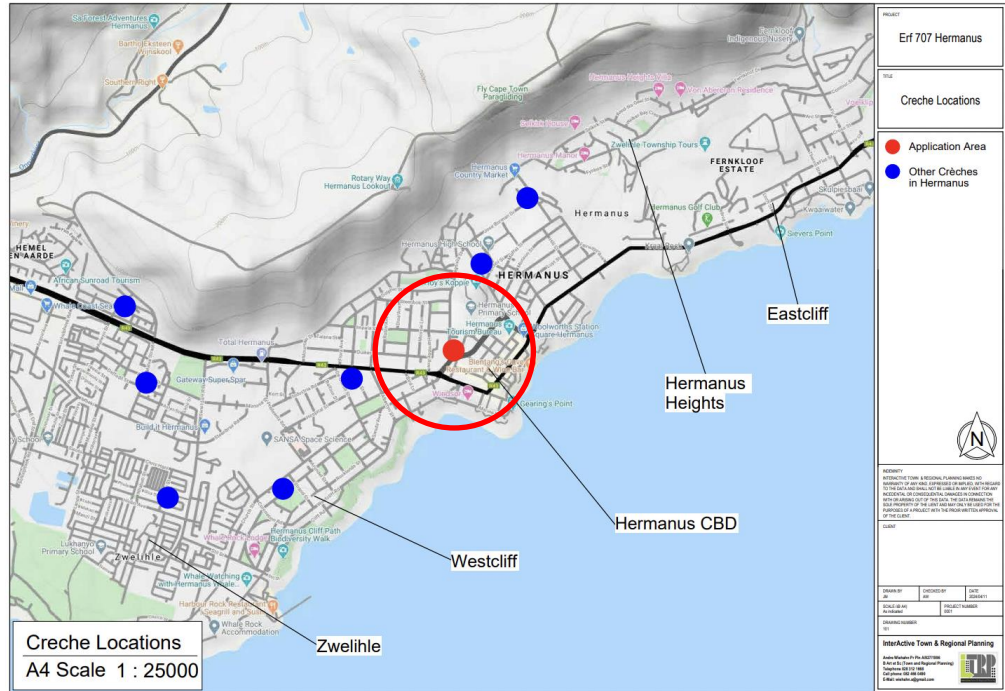


Figure 12: Crèche locations

Based on the above the application site can be considered fully consistent with the point of access criteria.

d. Population threshold criteria

In terms of provincial guidelines for development parameters of facilities the following criteria is set for population threshold:

“The following sets out the number of people / dwelling units that will justify the need for ECD:

- 2400 people (600 dwelling units) for low income areas.
- 3600 people (900 dwelling units) for high income areas, where a demand has been warranted.

Cautionary note: The provision of an ECD is highly dependent on the community profile. As a general rule of thumb, 40% of the children the age group (1 – 5) should be provided for.”

The pre-school / day care facility on the application site being located within the Hermanus business area can be considered as a middle income area given that the direct adjacent residential areas are middle/high-income areas whilst the children from the outside area being catered for are from lower, middle and higher income groups.

The measurement for this pre-school / day care centre cannot be clearly be determined by a specific radius, given that the fact that it is located within the Hermanus business area close to the general and central taxi rank and the Hermanus primary school from where parents travel from surrounding areas outside the direct threshold and catchment area. However, based on the Overstrand Municipality Growth Management Strategy, 2010, the number of dwelling units within the planning unit in which the application site is located amounts to almost 300 dwelling units.

It can be assumed that the daily inflow of people from the outer areas to the Hermanus central and especially the primary school area of almost 1 100 children will account and contribute to the threshold figures and the need and justification for such pre-school / day care centre in addition to the existing dwelling units within the threshold area.

e. Other criteria

The following guideline other criteria is provided for the assessment and justification of a pre-school from a provincial perspective:

- All facilities must comply with National Health and Safety regulations.
- In lower income communities: preferably within walking distance and on the route taken by older children walking to school.
- Noise factor to be taken into account when clustering facilities.
- A drop off area must be provided for parents, taxi's and busses, particularly in residential areas.
- All sites must be of acceptable proportion and gradient.
- Parking must be provided in larger ECD centres for at least the minimum staff contingent.

In terms of National Health and Safety regulations, the existing pre-school is fully compliant and was already subjected to a number of inspections.

Although the pre-school / day care centre provides for all income groups, the pre-school / day care centre is on the same route from the taxi rank where the lower income communities walk to the school. Respectively, the application site is only 120m from the taxi rank and the Hermanus Primary School is 150m further from the application site, meaning that both facilities are within easy walking distance for the lower income communities.

The noise factor is taken into account given the location of the application site being adjacent to existing but also possible future office working environments.

Furthermore the consideration must be taken that unamplified human voice is not considered a disturbing noise in terms of the Western Cape Noise Control Regulations, 2013.

Nevertheless in respect and consideration of the location in relation to the existing and future working areas the following specific noise mitigation measures are proposed to mitigate potential noise.

- Windows will be kept closed, especially on the northern side which faces offices.
- A 2,5m hedge is located between the pre-school / day care centre and the adjacent office,
- A restricted area is provided between the pre-school / day care centre and the adjacent office with the main play area furthest away from the adjacent existing offices,
- Break times and the playing of children outside will be limited to specific times and children will always be under supervision.
- No generators are or will be used.
- The application area is on a busy road which generates significant ambient noise, thus mitigating the potential additional impact of the pre-school / day care centre.

Cognisance must also be taken of the layout of the building as shown in the following sketch illustrating the noise mitigation measures:

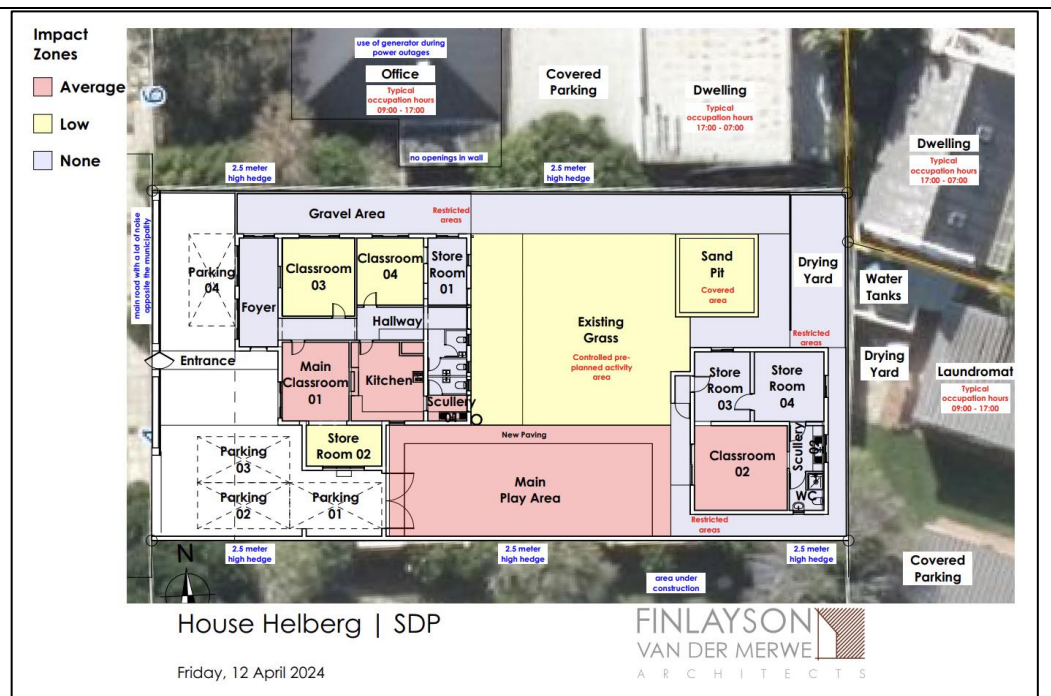


Figure 13: Site Development Plan

The surrounding area is a mixed-use area with significant ambient noise, thus being compatible with the nature of the proposal.

In terms of the Spatial Development Framework, 2020, community facilities should also be located at points of highest access in urban settlements which this pre-school / day centre complies with.

In terms of a drop-off area guideline, provision is made for a drop-off area and the number of parking is consistent with the Overstrand Municipal Land Use Scheme, 2020. In addition to this street parking is also available within the adjacent street.

Aligned with the provincial parameter guidelines, the application site is fully compliant in terms of the erf's proportion and gradient. The gradient is flat and the proportions of the property is rectangular with ample movement areas, and dedicated areas for the different functions of such pre-school / day care centre, inter alia making provision for safe vehicular area, play areas and also restricted movement areas.

Lastly, in terms of the Provincial guideline document "DEVELOPMENT PARAMETERS: A Quick Reference for the Provision of Facilities within Settlements of the Western Cape, relating to parking where it is required that "Parking must be provided in larger ECD centres for at least the minimum staff contingent" even as the pre-school / day care centre is not a large scale school, provision is made for staff parking, and is fully consistent in terms of the Overstrand zoning scheme, 2020.

d. Determination of an administrative penalty

Application includes the determination of an administrative penalty for the existing land use.

- The nature, duration, gravity and extent of the contravention;
The application area was used for a crèche with less than 5 children since February 2024.
- The conduct of the person (allegedly) involved in the contravention;
The owner is fully willing to cooperate and go through the necessary processes to legalise the existing crèche and allow for the proposed pre-school / day care centre.
- Report by a quantity surveyor in matters of unauthorised building/construction;
There has been no construction as the transgression was one of land use.

	<ul style="list-style-type: none"> • <u>Whether the unlawful conduct was stopped; and</u> The crèche is still operational as this application is to legalise the existing use. The crèche also provides employment as well as care for children which is considered to be undesirable if stopped. • <u>Whether the person allegedly involved in the contravention has previously contravened this By-Law or a previous planning law.</u> To our knowledge, the owners have not previously contravened any planning law.
	<p>e. Desirability</p> <p>The application proposal is considered desirable for the following reasons:</p> <ul style="list-style-type: none"> • The pre-school / daycare centre provides for an important need in the community which is to have a suitable place for younger children to go while parents are working. • The pre-school / daycare centre is well located in the sense that is close to the primary school and within the Hermanus CBD and has easy access to the transport network. • The location of the pre-school / daycare centre is within an area with significant ambient noise, especially from the road, thus reducing potential additional noise impact. • Potential noise impacts are mitigated, supervised and managed. • The application area is within a mixed use area and thus compatible with the character of the area. • The application proposal is consistent with the relevant policy documents and Western Cape provincial development parameter guidelines. <p>As motivated above, the proposal is considered desirable and is compatible with the character of the surrounding area.</p> <p>f. Planning Principles</p> <p>In terms of Chapter VI of the Spatial Planning and Land Use Management Act, 2013 the following Planning Principles have been applied to the application site:</p> <p>1) Spatial Justice which refers to the need for redressing the past apartheid spatial development imbalances and aims for equity in the provision of access opportunities, facilities, services and land.</p> <p>Possible results of the development The pre-school / daycare centre will be equitably available for children.</p> <p>The application proposal is consistent with the principle of spatial justice.</p> <p>2) Spatial Sustainability which refers to the fact that a spatially sustainable settlement will be one which has an equitable land market, while ensuring the protection of valuable agricultural land, environmentally sensitive and biodiversity rich areas, as well as scenic and cultural landscapes and ultimately limits urban sprawl.</p> <p>Possible results of the development The proposal is for a use of an existing developed property within the urban edge and will therefore not impact on valuable agricultural land, environmentally sensitive and biodiversity rich areas, or scenic and cultural landscapes.</p> <p>The application proposal is consistent with the principle of spatial sustainability.</p>

3) **Efficiency** which refers to the manner in which settlements themselves are designed to function in such a way that there will be a minimum need to travel long distances to access services, facilities and opportunities.

Possible results of the development

The pre-school / daycare centre is well located in terms of distances to travel since it is in close proximity to the primary school and within the Hermanus CBD, where parents typically work.

The application proposal is **consistent** with the **efficiency principle**.

4) **Spatial Resilience** which, in the context of land use planning, refers to spatial plans, policies and land use management systems which should enable communities to be able to resist, absorb and accommodate any economic and environmental shocks which might occur in a timely and efficient manner.

Possible results of the development

The proposal is for a use of an existing property and will not impact on spatial resilience.

The application proposal is **consistent** with the principle of **spatial resilience**.

5) **Good Administration** which, in the context of land use planning refers to the promotion of integrated, consultative planning practices in which all spheres of government and other role players ensure that a joint planning approach is pursued.

Possible results of the development

Consultive practices are being followed in this application as it is done in consultation with the Planning Department of the Municipality who will also advertise the application in such a manner as to enable the Government and the general public to participate in the eventual decision-making process.

The application proposal is **consistent** with the principle of **good administration**.

5. Conclusion

The application as motivated in this report is regarded **desirable** within its local context and well-integrated within the existing community land-use activities.

It is therefore recommended that the application **be approved** for the following:

- Consent Use for a Place of Instruction in terms of Chapter IV, Section 16(2)(o).
- The amendment of conditions of approval, Conditions 2 and 2(b) of the 2005, application number 4322 TP1-24/2004 approval in terms of Chapter IV, Section 16(h) to read as follows:
 - *“2. that the application relating to erf 707, Hermanus for rezoning from General Residential Zone to Local Business Zone (offices and place of instruction), be approved, subject to the following conditions:”*
 - *“(b) that sufficient parking be provided in terms of the town planning scheme.”*
- The determination of administrative penalty in terms of Chapter IV, Section 16(q).

ID	W01	W02	W03	W04	W05	W06	W07	W08	W09	W10	W11	W12
View												
Width	590	625	835	1 200	1 675	1 965	1 985	2 185	2 200	2 255	1 190	1 490
Height	590	1 000	1 470	1 200	1 150	1 155	1 140	1 455	1 160	1 210	1 140	590
Quantity	4	1	1	1	1	1	2	1	1	1	2	1
Finish	Aluminium Matt Gray	Aluminium Matt Gray	Aluminium Matt Gray	Aluminium Matt Gray	Timber	Timber	Timber	Timber	Timber	Timber	Timber	Timber
Glazing	Single - Clear	Single - Clear	Single - Clear	Single - Clear	Single - Clear	Single - Clear	Single - Clear	Single - Clear	Single - Clear	Single - Clear	Single - Clear	Single - Clear

ID	D01	D02
View		
Width	1 190	2 219
Height	2 125	2 125
Quantity	1	1
Finish	Aluminium Matt Gray	Aluminium Matt Gray
Glazing	Single - Clear	Single - Clear

FENESTRATION CALCULATIONS		BUILDING 01		PROJECT: STAND 707							
Energy Zone	2	Net Floor Area	125,00 m ²	Latitude	>32						
Floor Number	1	Net Glazed Area	24,96 m ²	Multiplier	0,54						
		(NF/NG)x100	19,97 %	Shading	2,34						
		U-Value W/m ² .K	Any Solution	SHGC	Any Solution						
		SHGC For S/W/SE/SW Any Solution									
NO	Window Description	Vertical h	Horizontal w	Area	U	g	p	h (V+g)	NEW	SHGC	T6
1	W05	1,15	1,68	1,93	7,90	0,53	0,12	1,68	N	0,81	
1	W09	1,16	2,20	2,55	7,90	0,53	0,12	1,69	N	0,81	
1	W07	1,14	1,99	2,26	7,90	0,53	0,12	1,67	N	0,81	
1	W04	1,20	1,20	1,44	7,90	0,53	0,12	1,73	N	0,81	
1	W02	1,00	0,63	0,63	7,90	0,53	0,12	1,53	E	0,81	
1	D01	2,13	1,19	2,53	7,90	0,53	0,12	2,65	E	0,81	
3	W01	0,59	0,59	1,04	7,90	0,53	0,12	1,12	E	0,81	
1	W03	1,47	0,84	1,23	7,90	0,53	0,12	2,00	S	0,81	
1	W10	1,21	2,26	2,73	7,90	0,53	0,12	1,74	S	0,81	
1	W06	1,16	1,97	2,27	7,90	0,53	0,12	1,68	W	0,81	
2	W08	1,46	2,19	6,36	7,90	0,53	0,12	1,98	W	0,81	
Total P				1,27	19,43	Total H					

FENESTRATION CALCULATIONS		BUILDING 02		PROJECT: STAND 707							
Energy Zone	2	Net Floor Area	61,00 m ²	Latitude	>32						
Floor Number	1	Net Glazed Area	8,66 m ²	Multiplier	0,54						
		(NF/NG)x100	14,19 %	Shading	1,06						
		U-Value W/m ² .K	Any Solution	SHGC	Any Solution						
		SHGC For S/W/SE/SW Any Solution									
NO	Window Description	Vertical h	Horizontal w	Area	U	g	p	h (V+g)	NEW	SHGC	T6
1	W11	1,19	1,14	1,36	7,90	0,53	0,12	1,72	N	0,81	
1	W11	1,19	1,14	1,36	7,90	0,53	0,12	1,72	E	0,81	
1	W12	0,59	1,49	0,88	7,90	0,53	0,12	1,12	E	0,81	
1	W01	0,59	0,59	0,35	7,90	0,53	0,12	1,12	W	0,81	
1	D02	2,13	2,22	4,72	7,90	0,53	0,12	2,65	S	0,81	
Total P				0,58	8,31	Total H					

ADDITIONAL ENVIRONMENTAL SUSTAINABILITY AND ENERGY USAGE INFORMATION:

1. HOT WATER SUPPLY according to SANS 10252-1:2012

HOT WATER CALCULATIONS:

Type of accommodation: Low Rental: 80-115L/Capita/Day based on Table 2, SANS 10252-1 per day

Assumed Hot Water Consumption: 115 L

No of Persons: 6

Assumed Daily Hot Water Consumption: 690,0 L

Assumed Annual Hot Water Consumption: 345,0 KL

50% of Annual hot water consumption: 172,5 KL

Daily Hot Water Consumption: 517,5 L

NOTE: Solar Heating Systems must comply with SANS 1307, SANS 10106, SANS 10254 and SANS 10252-1. NOTE: All water installations in the building must be in accordance with SANS 10252-1 and SANS 10254.

1.2 Pipe Insulation:
Pipes with internal diameter of 80mm or less will require a min. thermal insulation of 1,00
Pipes with internal diameter of 80mm or more will require a min. thermal insulation of 1,50
Refer to SANS 294.

1.3 Hot water vessels/ tanks Insulation:
Minimum required R-Value for vessel/tank insulation of 2.
Additional insulation to manufacturer's insulation may be required to achieve this value.
The design complies with the requirements of SANS 10400-KA:2011 and SANS 10252-1:2012 for hot water supply.

2.0 Orientation of Building

The building is orientated towards the Northern direction.
The major areas of glazing is placed on the northern side of the building to allow solar heat to penetrate the glazing during the winter months.

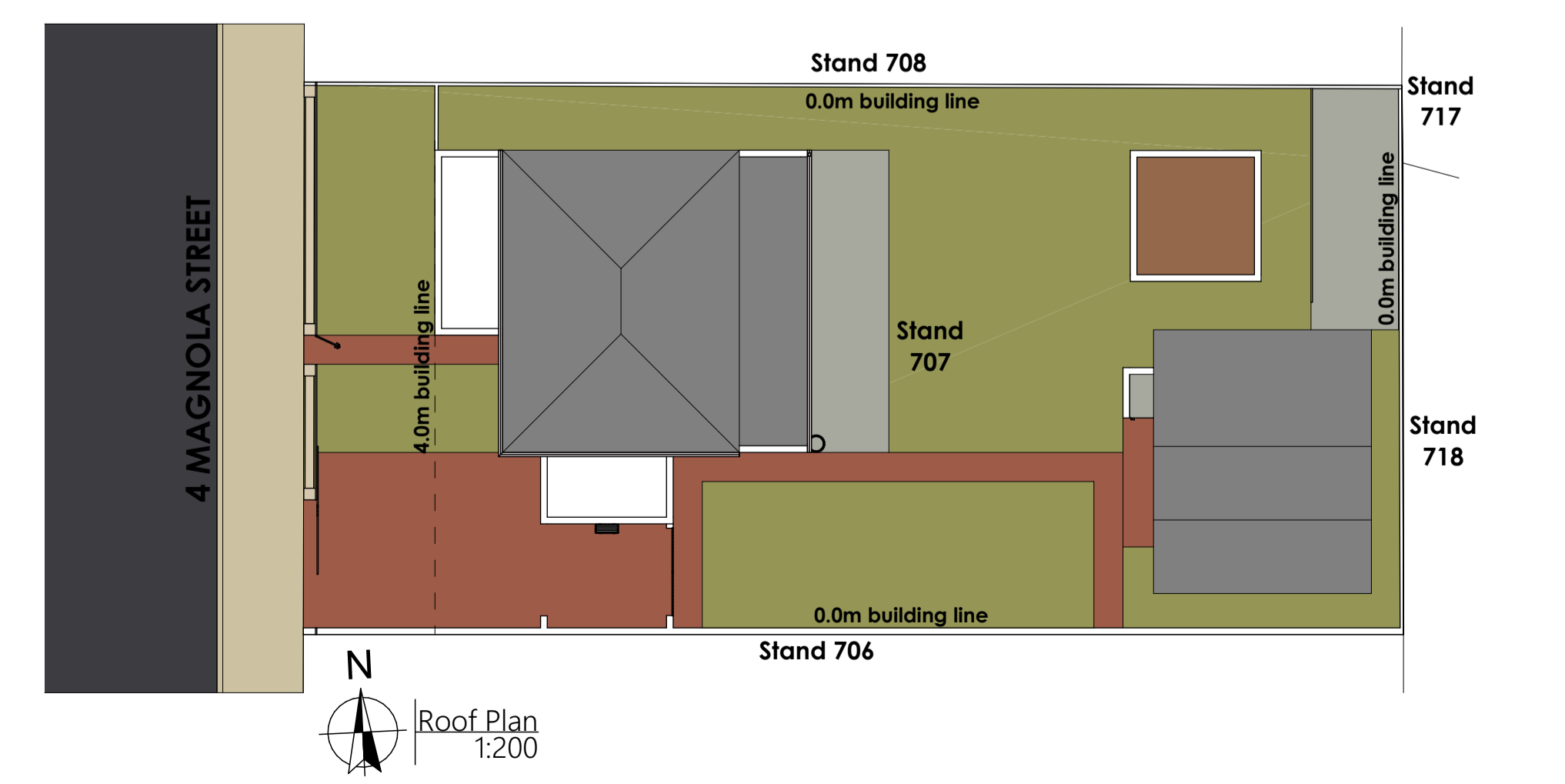
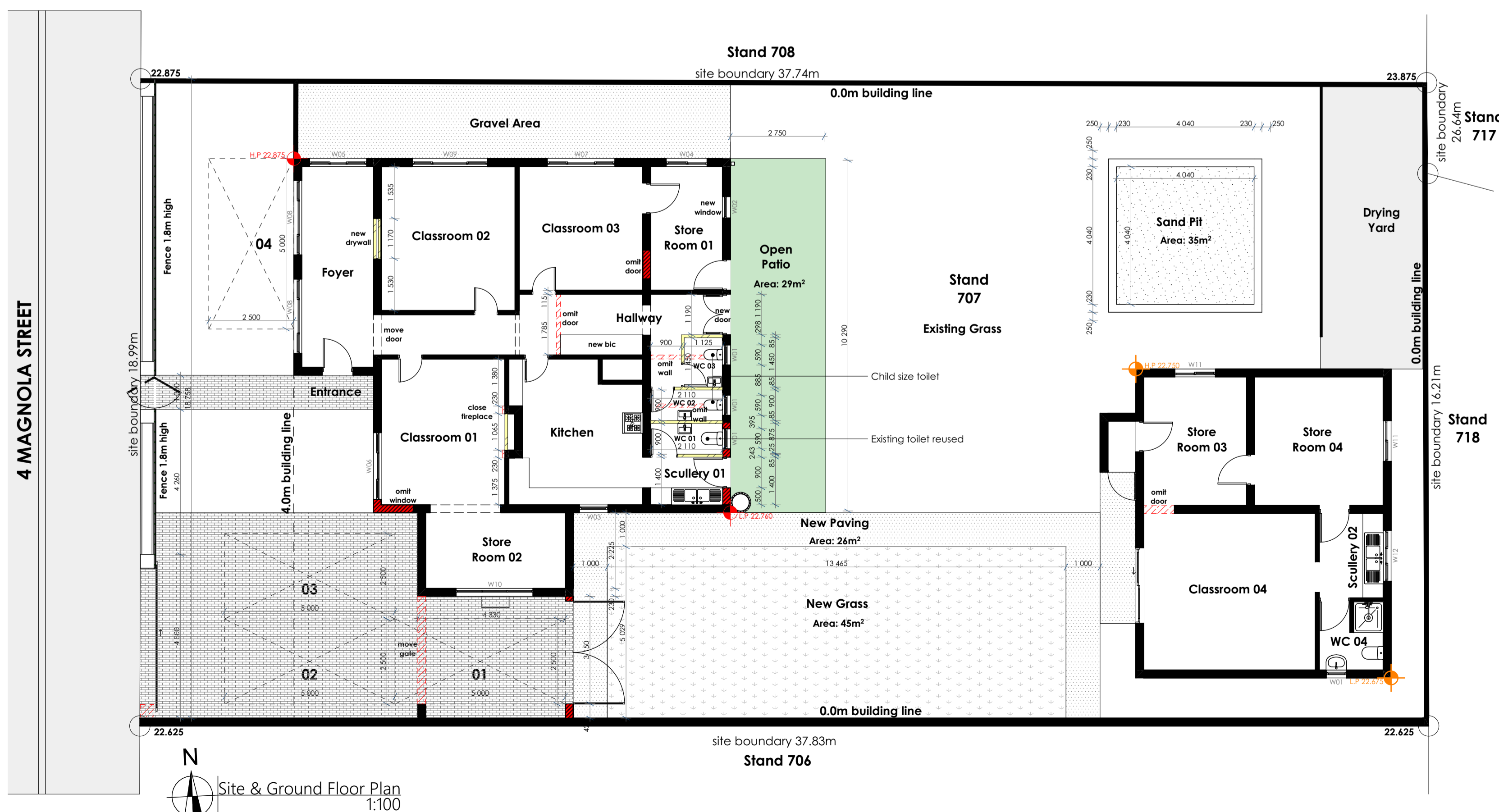
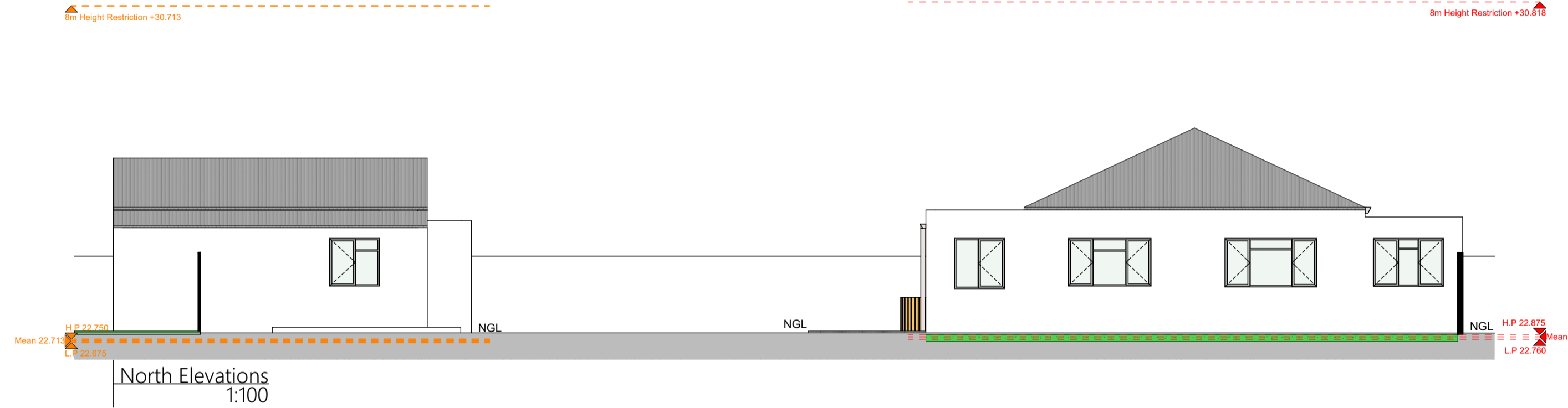
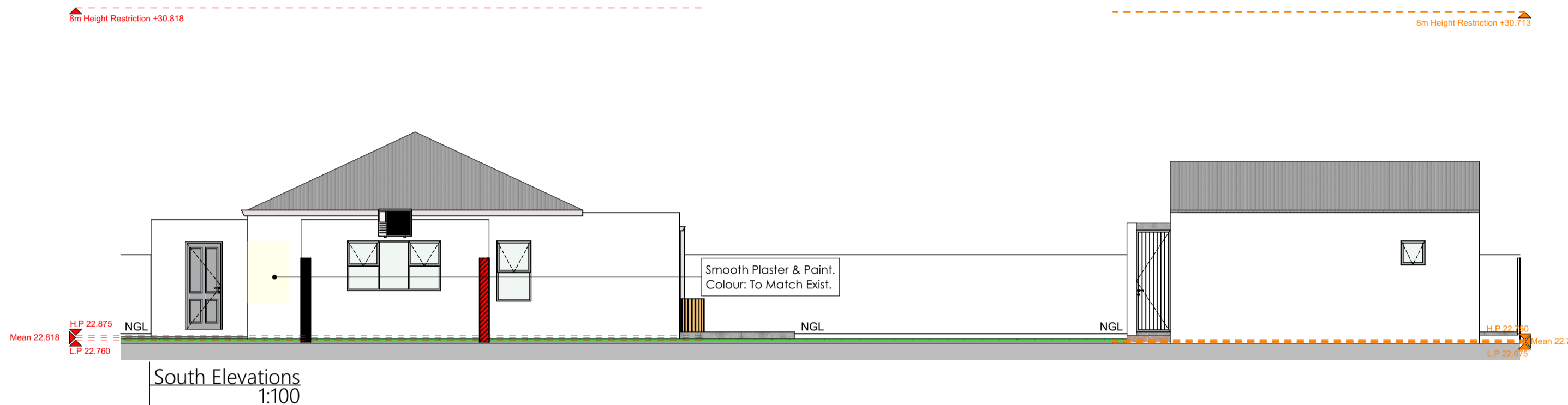
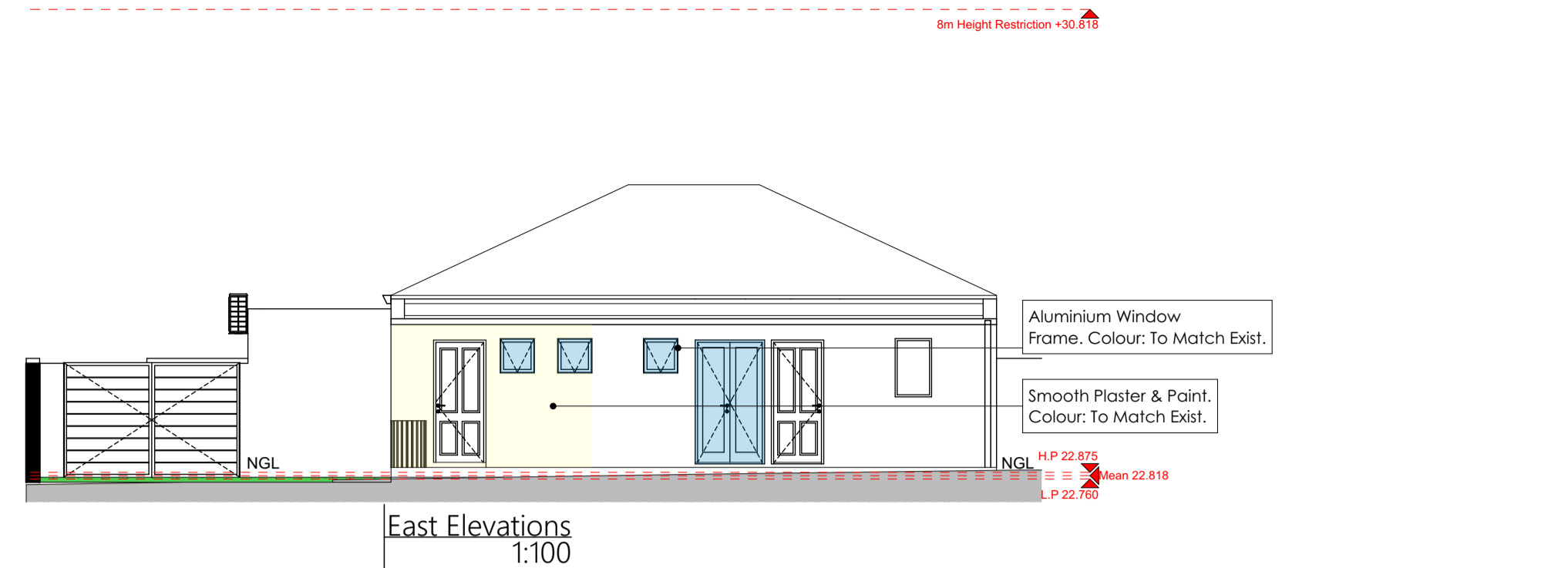
The design complies with the minimum requirements of SANS 10400-KA:2011.

3. ESTIMATE ENERGY CONSUMPTION:

Legend	Description	Watt	Amount	Total Watt
	Low Voltage Light Fitting: 2 Globes	22 Watt	0	0
	Low Voltage Downlight	11 Watt	7	77
	LED Fluorescent Light Fitting: 2 Globes	19 Watt	2	38
	Low Voltage Light Fitting: 1 Globe	11 Watt	3	33
TOTAL: 148Watt				
House Area 48m ²				
(SWatt/m ² permitted) 3,08Watt/m ²				

MAXIMUM ANNUAL ENERGY DEMAND AS PER SANS 10142 = 1820 kWh/a
1,000 x 1820 = 1820 kWh/a
ACTUAL: 0,148 x 1820 = 269,36 kWh/a
ESTIMATED ANNUAL ENERGY CONSUMPTION = 269,36 kWh

The design complies with the minimum requirements of SANS 10400-KA:2011 for energy consumption.



GENERAL NOTES

- The design of the drawing remains the property of the Architect
- All work to be carried out with strict accordance with the National Building Regulations, Municipal Regulations and SANS 600
- All relevant details, levels, dimensions and positions must be checked and verified on site before commencing any building work
- Any discrepancies and queries to be forwarded to the Designer immediately
- All architectural drawings to be read in conjunction with all relevant structural, mechanical, electrical, civil Engineer's and other Specialist drawings
- Only signed dimensions to be used and not copied
- Consultant to ensure compliance with safety regulations at all time

SPECIFICATIONS:

ROOF:

- All roofs to be approved by appointed structural engineer and to comply with SANS 10400 Part 1
- Engineer to approve design and do necessary inspections on structure and connections to walls etc.

WALLS:

- New external brick work to be 280mm cavity walls of 115mm ROK's with 50mm cavity, tied together with wall ties every distributed of 2.5 ties per square meter of face area.
- New external brick work cavity walls to have Damp Proof Course (DPC) from internal skin down to external skin with weep holes at regular intervals (every fifth brick only) in the external skin.
- New internal load bearing walls to be min 230mm and in strict accordance with engineer's detail and specification.
- New internal non-load bearing walls to be 110mm ROK brick work.

FLOOR SLABS:

- New ground floor slabs are to be cast of a minimum of 100mm thick reinforced in accordance with engineer's specification, laid on 250mm Damp Proof Membrane, turned up around the perimeter of least the full thickness of the slab, on 50mm concrete with at least a R-Value of 1, on maximum 150mm well compacted sand, on clean well compacted B layers not more than 150mm in thickness.

FOUNDATIONS:

- All footings, stais, columns and beams to be in accordance with drawings and specifications supplied by the appointed engineer.
- All new foundations are to be min 1000Pa at 28 days (1.45 coarse aggregate) of min 200mm thick.

WATERPROOFING:

- All parapet walls to receive Duraflex flashings.
- All windows and doors to receive vertical and horizontal DPC and to be sealed with polysulphide.

WINDOWS AND DOORS:

- Refer to Window and Door Schedule for specifications

COILING:

- Note: If air conditioning units are installed, efficiency of minimum COP=2.5 is required.

LIGHTING:

- Note: New and existing lighting to be max. 5W/m², if any halogen downlights are present in the existing building, these are to be replaced with LED fittings.

REVISION:

Architect's Signature: _____ Date: Wednesday, 27 March 2024

Client Signature: _____ Date: Wednesday, 27 March 2024

AREAS:

Building	Existing Ground Floor	Ground Floor Additions	Total Ground Floor Area
Building 1	135,0m ²	0,0m ²	135,0m ²
Building 2	69,7m ²	0,0m ²	69,7m ²
Total Area.			204,7m²
Site Area.			714,0m²
Coverage			28,67%
F.A.R.			0,29

ZONING: B3 - LOCAL BUSINESS

BUILDING OCCUPANCY CLASSIFICATION: A3

PLACE OF INSTRUCTION: Occupancy where school children, students or other persons assemble for the purpose of tuition or learning.

FINLAYSON VAN DER MERWE ARCHITECTS

1 Village Lane H&A Village Onrus River Western Cape
7201 South Africa / 028 313 0741 / 028 313 0747 / www.fvdm.co.za

Project Name: **Kleuterkampus Hermanus**
4 Magnolia Street Hermanus 7200

Drawing Name: **Plans & Elevations**

Drawing Status: **COUNCIL SUBMISSION**

Drawn by	Date
JVM	2024/03/27

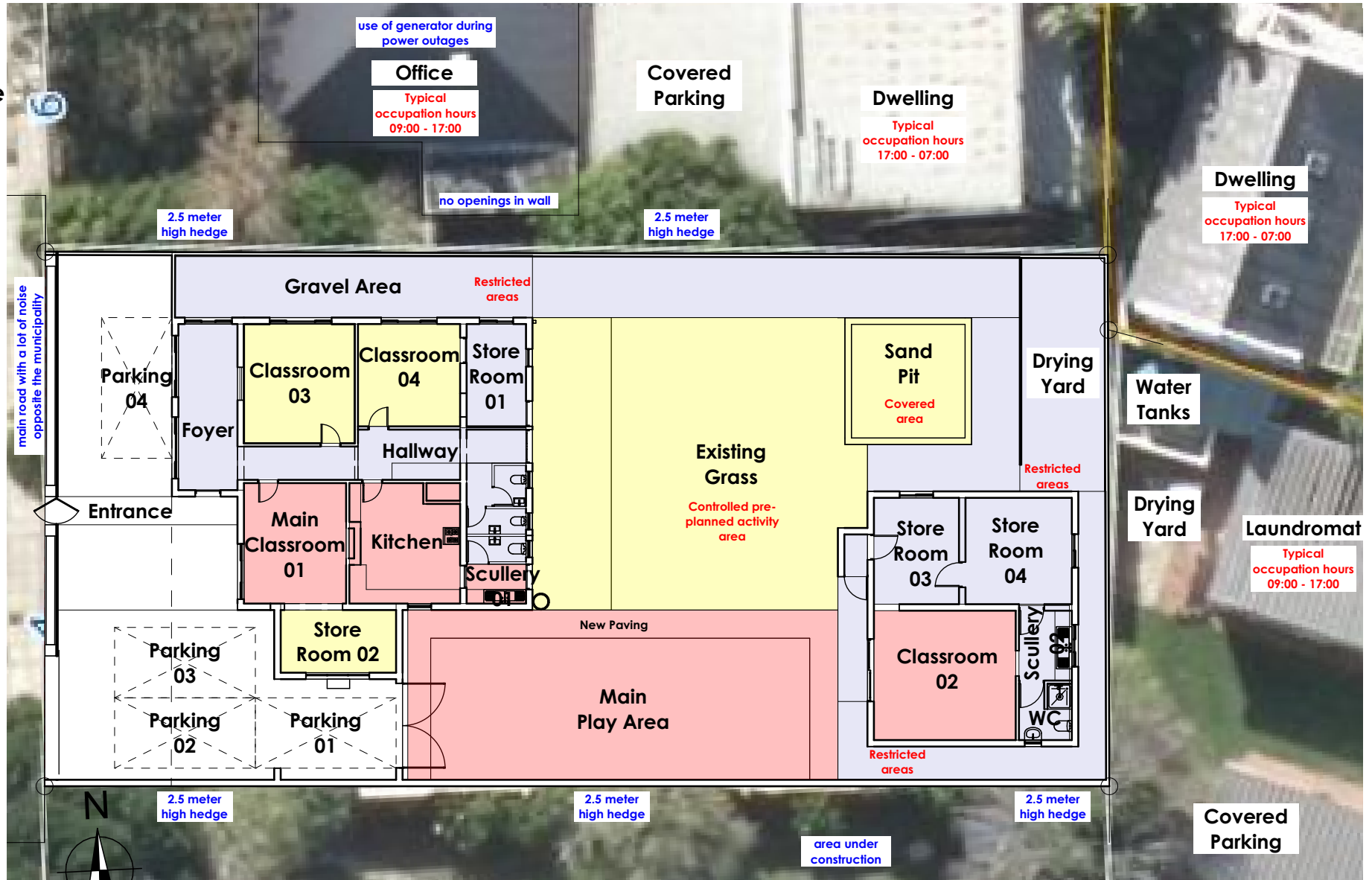
Checked by	Date
JVM	2024/03/27

As shown @ A1

Drawing No.	Status	Revision
2321.100	CS	A

Impact Zones

- Average
- Low
- None



House Helberg | SDP

Friday, 12 April 2024