

**APPLICATION FOR CONSENT USE IN TERMS OF SECTION 15(2)(0) OF THE KNYSNA MUNICIPALITY: SPATIAL PLANNING AND LAND USE MANAGEMENT BY-LAW, 2021 FOR THE ERECTION OF 14.99m TREE TYPE CELL MAST AND A BASE STATION ON PORTION 41 OF THE FARM RONDE VALLEY NO 187 DISTRICT GEORGE**

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May 2022

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# 1 INTRODUCTION

## 1.1 Appointment and brief

Application for Consent Use on Portion 41 of the Farm Ronde Valley No. 187, in the Municipality of Knysna, Administrative District of George, Province of the Western Cape, for the erection of a 14.99m Monopole mast is made by Galaxy Palm (Pty)(Ltd) on behalf of Gyro Group (Pty) Ltd who have entered into a lease agreement with the current registered owner Pine Lake Marina Limited (Incorporated in British Virgin Islands). Refer to **Annexure A** for the Power of Attorney indicating appointment and **Annexure B** for the Company Resolution and **Annexure C** Lease Agreement.

## 1.2 The subject property

Portion 41 of the Farm Ronde Valley No. 187 District George measures 9,2358 (NINE COMMA TWO THREE FIVE EIGHT) Hectares IN EXTENT. Reference can be made to **Annexure D** for a copy of title deed T4114/10 and **Annexure E** for a copy of Surveyor General Diagram.

The zoning certificate indicate that the subject property is zoned for Resort Zone in terms of Knysna Land Use Scheme By-law 2021. Reference can be made to **Annexure F** for confirmation of the zoning certificate.

## 1.3 The Submission

The application is hereby made on behalf of our client Gyro Group (Pty) Ltd to allow the following on Portion 41 of the Farm Ronde Valley No. 187 District George.

- **Consent Use Application** in terms of Section 15(2)(o) of the Knysna Municipality: Spatial Planning and Land Use Management By-Law, 2021, to allow the construction of a freestanding base telecommunication mast station with a 14.99m monopole mast.

In terms of the Knysna Municipality: Zoning Scheme By-law 2020, a primary use for Resort Zone (i.e. Current Zone) is for *Tourist Accommodation* and **Consent Uses** include: *Freestanding base telecommunication station; Function venue; Guest Lodge Hotel; Off-road trail; Outdoor trading and dining; Rooftop base telecommunication station and Tourist facilities Wellness centre.*

## **2. CONTEXTUAL INFORMANTS**

### **2.1 Locality**

The concerned property is identified as Portion 41 of the Farm Ronde Valley No. 187, in the Municipality of Knysna, Administrative District of George, Province of the Western Cape. Situated in Swartvlei area (hereafter referred to as "Property"). As previously mentioned, the property is situated along Lakeside Drive just of the N2.

### **2.2 Surrounding Area**

"Pine Lake Marina Resort" one of the special public recreational destinations is located on the Property. The Property is surrounded by the Swartvlei dam to the east and vacant vast agricultural land farms to the north-west and south. The property is located on the outer skirts of Sedgefield which falls under the Knysna Local Municipality.

### **2.3 Land Use**

The proposal entails the erection of a 14.99m Freestanding Base Telecommunication station on the property. The property is currently zoned "Resort Zone" and is utilised for tourist accommodation related activities.

## **3. DEVELOPMENT PROPOSALS**

### **3.1 Development**

It is the intention of our client to apply for the Consent Use to allow the additional use of a Freestanding base telecommunication. The application entails the following proposed development parameters:

- Erection of a 14.99m Monopole mast situated at the centre of the property
- Installation of 3 triband antennae on the proposed 14.99m mast
- Installation of 3 transmission dishes on the proposed 14.99m mast
- 3 x equipment containers
- Lighting spike and Navigation Lights
- The mast & equipment containers will be placed on the ground level

### **3.2 Access**

Access to the proposed freestanding base station will be obtained from the existing entrance on the property.

### **3.3 Security**

The proposed freestanding structure will be constructed on the Property and fenced off separately. The telecommunications radio and transmission equipment will be installed inside alarm monitored containers; these containers are secure as they are locked at all times. The antennae will be located 10m-14.99m above the ground level and are inaccessible to the public. A mast gate with a high security lock will be installed ensuring increased security to mast. Access to the equipment and antennae will be limited to registered and qualified personnel only. Health and safety legislation also require restrictive security signage (0.4 x0.5m) to be attached to access gate, containers, and mast door.

The above safety and security measures have been put in place by telecommunication operators and legal entities to prevent access to the public and greatly reduce vandalism of the equipment.

### **3.4 Electricity Requirements**

Electricity supply will be obtained from the available on-site supply, technological advances have also seen current telecommunications equipment reduce their electricity usage.

### **3.5 Environmental**

Environmental and social sustainability are regulated by the National Environmental Management Act (Act 107 of 1998) (NEMA)- published in Government Notice No. R324. When read together with the National Environmental Management Act Regulations Listing Notice 3 of 2017 (promulgated April 2017), an Environmental Impact Assessment (EIA) or Environmental Authorization (EA) is only applicable in the following circumstances:

*The development of masts or towers of any material or type used for telecommunication broadcasting or radio transmission purposes where the mast or tower:*

- i) Is to be placed on a site not previously used for this purpose; and*
  - ii) Will not exceed 14.99 metres in height*
- but excluding attachments to existing buildings and mast on rooftops*

The requirements in the Western Cape are defined in NEMA Listing Notice 3 of 2017:

*(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.*

As this site falls outside an **urban area** in Swartvlei, Galaxy Palm (Pty) Ltd have applied for Environmental Authorisation with DEADP and is attached as **Annexure G**.

## **4. MOTIVATION**

### **4.1 Background**

The Pine Lake Marina Limited was approached by our client and entered into a lease agreement to erect 14.99m monopole Freestanding Base Telecommunication Station on the Property. The property is zoned "Resort Zone" in terms of the Knysna Municipality: Zoning Scheme By-law, 2020 and allows for the development of a Freestanding Base Telecommunication Station through a Consent Use application, hence the Consent Use application to allow the proposed development.

Over recent years cellular communication in South Africa has evolved from merely a means of convenience to an essential business tool, means of communication and safety measure. Initial high tariff rates limited the accessibility of the product and its service. However, over time more reasonable consumer tariffs and packages have been introduced, making cellular communication more accessible to a much larger sector of the population.

Data usage on the mobile networks is also becoming faster, more affordable, and more accessible. User behaviour patterns are continuously changing in reaction to cheap internet, new data intensive smartphones, data intensive applications and

websites, and an increasingly social-media-driven society. These factors resulted in the average consumer data usage doubling every year.

The current cellular infrastructure is not equipped to handle this level of high demand. As a result, the network become congested with connection problems and dropped calls on the voice network and limited or unstable internet connections on the data network.

Cellular service providers are taking steps to improve their network by keeping abreast with the advances in communication technology and providing increased capacity in terms of coverage in the areas where there is an increased demand. Gyro Group (Pty) Ltd strives to make this technology available to a wider spectrum of the population.

Newer technology such as LTE provides faster internet to more users which alleviate the pressure on the base station, however its range is very limited. A single old generation GSM voice-based station could cover dozens of kilometres. The new LTE base station have a maximum coverage range of 500m depending on the number of users.

The congestion of existing sites together with the decreased in its coverage range necessitates that the distance between base stations decreases, resulting in the need for construction of new freestanding and rooftop cellular base station.

It is estimated that cellular network operators in South Africa will build more than 4000 new base stations over the next 5 years. The proposed site is located at a nominal point as identified by Gyro Group (Pty) Ltd network Planners. By utilizing site located at the networks' nominal points the number of future base stations is limited and an effective service network can be developed.

The proposed erection of the Freestanding Base Telecommunication station will not have an impact on parking, coverage or floor factor as described in the Knysna Municipality: Zoning Scheme By-Law, 2020.

## 4.2 Physical Characteristics

RF Engineers are subject matter experts and identify sites by utilizing a specific set of engineering rules and principles, the Property was identified as a prime position on the following premise:

- Property offers the optimal position situated far from existing and planned base stations to provide efficient data and voice coverage. (1km Radius Map and coverage-existing cell mast are in Sedgefield which is few kilometres away)
- Surrounding geographical aspects are in line with the requirements
- Minimized physical, natural, and visual impact
- Ability to reduce the number of base stations in the surrounding areas
- Ability to provide sufficient security to the equipment
- Capacity to share infrastructure with majority of operators (three operators will be accommodated- this promotes co-sharing as per (Policy for the Placing, Size and Appearance of Cellular Communication Masts within the Knysna Municipal Area, 2008)
- Property position will address the complaints received in the area (particularly holiday makers using Pine Lake Marina for accommodation).

To achieve the optimal data and voice coverage objectives, base station in this specific area needs to be approximately 500m apart on average, this is due to the density of the surrounding areas as well as geographical and physical features. The closest urban built-up area to the Property is Sedgefield which is 5.65km away from the Property. The fresnaye effect also influence the quality of the voice and data coverage caused by the amount of steel and concrete of the buildings in the surrounding area, this results in a reduced coverage area.

## 4.3 Title deed restrictions

In respect of the Property, it was found that there are no restrictive conditions contained in the title deed No. T4114/10. (Please refer to the attached **Annexure D: Title Deed**).

#### 4.4 Health

Current research on telecommunications base stations has reached a point whereby scientists are satisfied that base stations do not pose a health threat. Research on handset is however ongoing, as it is deemed that placing the handset against your head could pose a greater threat to health. Mobile phones are low powered radiofrequency transmitters. They operate at frequencies between 450 and 2700MHz. the handset only transmit power when turned on. Using the phone in an area of good reception (i.e., network) decreases exposure as it allows the phone to transmit at reduced power.

In the statement made by the World Health Organisation (WHO) it is stated that effects from the base stations and wireless networks are so low that the temperature increases are insignificant and do not affect human or animal health.

The WHO in 2004 said:

*"In the area of biological effects and medical applications of non-ionizing radiation approximately 25 000 articles have been published over the past 30 years. Despite the feeling of some people that more research needs to be done, scientific knowledge in this area is now more extensive than for most chemicals. Based on a recent in-depth review of the scientific literature, the WHO concluded that current evidence does not confirm the existence of any health consequences from exposure to low level electromagnetic fields."* – World Health Organization (WHO)- Website: <http://www.who.int/peh-emf/research/database/en/>.

Radio waves are emitted by numerous instruments including microwave ovens and television screens inside our households. Walking along any street exposes us to RF emissions. RF emissions are part of modern-day society and scientist continuously monitor the impacts of these.

International Commission on Non-Ionizing Radiation Protection (ICNIRP), an independent scientific organisation established in 1992 published guidelines providing a means of limiting and guiding human exposure to electromagnetic fields. These guidelines have become the world standard for human exposure to electromagnetic fields. ICNRP considers both the thermal and non-thermal effects of RF exposures as well as all other identified hazards of RF exposure. Cellular equipment's needs to

comply with all the regulations of ICNRP as well as the WHO and also National Legislation governing the use of this equipment and the emission of radio waves. ICNRP allows for an exposure measurement level of 41.00(v/m) at a height of 14.99m from the antennae. Cellular operators' antennae operate at a level of not more than 0.04 (v/m) at a height of 14.99m, in laymen's term the levels are approximately 1/1000<sup>th</sup> of the prescribed exposure levels. It is therefore clear that the installation of these antennae does not pose a health risk. Cellular companies monitor the health impact of their base stations carefully and spent large sums of money researching this topic annually.

The National Department of Health has also published EMF exposure limit guidelines. These are based on guidelines endorsed by the ICNIRP. Emissions from all existing and proposed base station are following these guidelines and are far below international standards.

A statement by the Department of Health dated 19 January 2018 on the Health Effects of cellular communications base stations state the following (see **Annexure H** attached in application):

- Considering the very low exposure levels and research result collected to date, there is no convincing scientific evidence that the weak RF signals from base stations and wireless networks cause adverse health effects.

Also mentioned in the statement of the Department of Health another WHO fact sheet was published in June 2011 and reviewed in October 2014 (i.e., Electromagnetic Fields and Public health; <http://www.who.int/mediacentre/factsheets/fs193/en/>) and subsequently concluded the following:

*"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."*

Further on in the document (attached in the application), the Department of Health goes on to say that:

*"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 station."*

*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."*

#### **4.5 Need & Desirability**

In modern times it is rare for a member of the public only to utilise one cellular phone, majority utilize cellular phone for personal and additional phone, iPad or dongle for business purposes, it is on this premise that we believe it to be in both the Municipality and operators interest to address the problem of weak voice and data coverage and provide the surrounding high traffic commercial and business community with the basic need of effective voice and data coverage, as it has become an integral part of our daily lives.

When selecting a site, special consideration is given to the geographical aspects so that the cellular infrastructure is positioned to ensure optimal functionality and availability to the customers. This reduces the number of base telecommunication station necessary to provide the best possible experience for the end user. The systemic location of the mast was chosen based on the activities around the Swartvlei Area (Which mostly focused on its character), ownership of the property, the current land use together with the zoning of the property.

Prior to the submission, different institutions are consulted to make sure that the proposed development promotes green economy, such institutions include department of Environmental Affairs, Civil Aviation Authority and any other that might be needed by the municipality. The proposed development aims to cover a radius of between 300m to 450m of the Pine Lake Marina Resort. This will help the Resort area to reach the 5 Generation (5G) Network. The image below shows that there is not mast within the 500m radius of the proposed location, which also mean that the complaints of dropped calls will be solved.

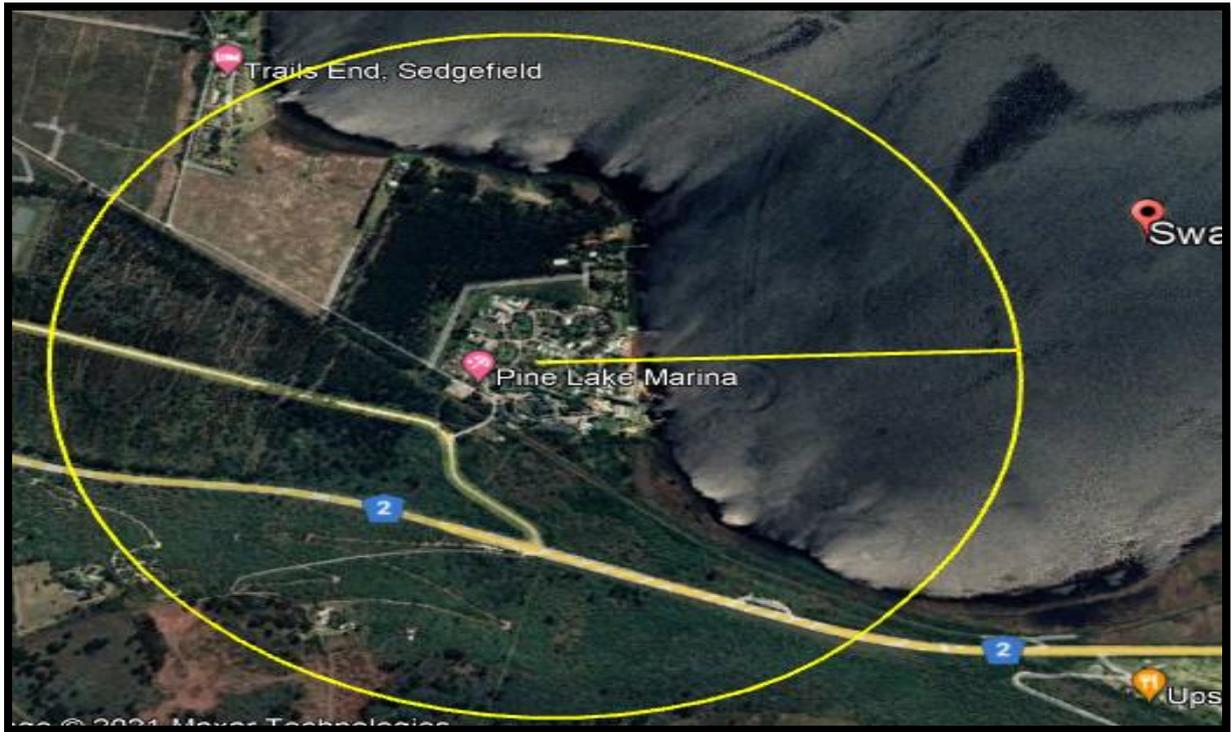


Figure 1: 1 km radius of the proposed mast location

Our client Gyro Group (Pty) Ltd pride themselves in ensuring that a positive impact is created in terms of the social, environmental, and economic wellbeing of the area. Since the introduction of LTE in South Africa in 2012 there has been a greater need for access to faster data, due to the higher penetration of LTE data in commercial and business areas, this had led to lower subscription fees which provide economic sustainability and development. LTE will ultimately address high data traffic requirements and the surrounding community will be the main beneficiary.

The erection of a telecommunication base station does not impact on the current or surrounding land uses of the property, as it will occupy an area of 100m<sup>2</sup> out of 9.23 58 hectares which is total footprint of merely 0.10% of the total size of the Property. The construction and maintenance phase of the proposal will provide a positive economic and social impact by ensuring job creation effecting the surrounding community in a positive way. The construction of the proposed mast will ensure that the there is a strong network coverage in around the Pine Lake Marina Resort and the holiday makers will no longer complain about poor network coverage and cut-off voice calls, this will ensure there is a reliable network connection.

The increase in number of individuals in the Swartvlei area during holiday seasons create a high demand of effective voice and data requirements. The construction of the proposed telecommunication base station will alleviate the congestion that result in poor network coverage that inconvenience the customers of different network operators, this will ensure that residents and the guests a better network connection, it will further cater for business executives doing business in the area. This will ensure that businesses the area (i.e. Guesthouse and resorts) have reliable network that will ensure that their consumers have a better connectivity to the world and assist in drawing other investments on the surrounding properties to ensure the economic growth for the municipality. The proposed development will blend well with the land uses in the neighbourhood.

#### **4.6 Choice of site**

Policy for the Placing, Size and Appearance of Cellular Communication Masts within the Knysna Municipal Area, 2008 guidelines were followed when selecting the location for the mast. When choosing a site for a telecommunication base station, service providers are guided by nominal points indicating the areas where poor signal is being experienced.

These nominal points are selected because of customer complaints, within an area. When there is an increase in the number of users in an area, the coverage provided by the existing network decreases, leading to dropped calls and lack of data services. The objective used in selecting the site for the mast are as followed:

##### Objective1. Identify other cellular mast in the area that can be shared

The first option was to identify other masts in the area that can be shared. Sharing of towers are always considered when evaluating a site. It is however not always an option, since the towers may not have available space to share or have exceeded their design load capacity or not within an applicable radius to cover infrastructure needs. When reviewing the surrounding area, the closest existing mast identified is 3km from the proposed site, which will not suffice in cellular coverage within area.

Marina Resort is 3 to 5 km away from Sedgefield. There is an existing cell mast in Sedgefield, given the population density of the area, the cell mast in these areas have reached their carrying capacity and as a result they cannot service the resort.

### Objective 2. Cellular antennae on high buildings

Within a 500m radius of the area investigated there are no high building for us to consider the installation of a rooftop base telecommunication station.

### Objective 3. Consideration of schools and churches

These sites are also however not always to be found within the radius of the nominal point. The site investigation confirmed that there are no site of schools and churches within the radius of 500m of the nominal point.

### Objective 4. Business/ Industrial/Farming properties

These are one of the most ideal locations and will always be the one of the first options considered if they are located within the 500m radius of the Optimal Position and if there are interest from the property owners. Pine Lake Resort is located on a Farm, and it was found to be the nominal point for the telecommunication mast and the property owners showed interest in allowing the construction of the mast due to the weak network experienced in the area. It was against this backdrop that the Property (i.e. Portion 41 of the Farm Ronde Valley No. 187) was selected for the proposed development.

### Objective 5. Residential Properties

One of the final options to investigate is the residential properties and are only considered when all above mentioned options have failed. The identified nominal point is located very far from residential area, this was not an option during the selection of the site.

### Objective 6. Government/ Municipal properties

Large public open spaces will be ideal for cellular masts, the difficulty and time constraints to obtain lease with the Municipality and Government entities thus make them one of the least desirable properties to consider.

#### **4.6.1 Alternative Site**

There was another alternative site identified along Lake Side Drive but due to the distance and the conservation topography and the fact that it was not the nominal

point the site was found not viable. The 5G network cover a radius of up to 500m and the intention of the proposed mast is to service the Pine Lake Marina Resort due to complains received by the owners from the holiday makers making use of the resort.

#### **4.7 Existing policy Framework**

##### **Western Cape Economic Development Strategy (2009)**

The Directorate for Economic and Human Development publish a draft Economic Development Strategy in 2009 which supports the need to provide fundamental telecommunication infrastructure and to provide the best possible available network coverage. This will lead to the attraction and growth of the commercial sector and at the same time retain and advance skilled persons.

Below is an abstract from the above-mentioned policy supporting telecommunications infrastructure:

*“High data access and low telecommunication costs are a key input factor for local community, business and industry to achieve sustainable growth and*

*Taking into account the high accessibility of mobile telephones and the growth in the mobile telecommunication market, the provincial government will actively seek to create technology parks in nodal areas in order to increase the digital literacy of citizens”.*

As confirmed by the policy, basic access to voice and data coverage is defined as a basic need for the public and falls under the umbrella of electricity, water, sanitation, and access.

#### **4.8 Electricity**

The electricity supply for Telecommunication Infrastructure must, where practically possible, make use of underground cables. All electrical installation must be as per ESKOM or the Local Municipality's Electrical Department requirements and standards. Our client will ensure that the proposal will be in line with the above-mentioned electrical supply requirements.

#### **4.9 Visual impact**

Special considerations have been given to the placement of the proposed freestanding base station to minimize the visual impact as far as possible however this is challenging at times. The proposed erection of a 14.99m freestanding base station will offer the opportunity for operators to collocate resulting in the reduction of future telecommunication towers. Our client Gyro Group (Pty) Ltd has selected to erect tree type design mast to reduce the visual impact and be in fitting with the surrounding environment due to its perceived transparency.

Should the relevant departments within the Municipality require altered design the client would be willing and forthcoming to the proposal. The proposal will not impact on the current land use. This mast will create collocation options for three of four Major Network Operators (e.g., Vodacom, MTN, Cell C and/ or Telkom Mobile).

**4.10 Access and Traffic consideration**

The property is easily accessible, and access will be obtained from Lake Drive. This road has low traffic volume thus the development will not affect traffic negatively and will not cause any additional traffic volumes to the area.

**5. CONSISTENCY WITH SPLUMA PRINCIPLES**

This application complies with the land development principles (Chapter 2, SPLUMA, 2013) as referred to in Section 42 of the Spatial Planning and Land Use Management Act, 2013 (Act 16 of 2013).

<b>HOW DOES THIS APPLICATION COMPLY WITH THIS PRINCIPLES?</b>	
<u>The principle of spatial justice</u>	In a broader sense, spatial justice refers to the fair and equally distribute services and enhanced accessibility of these services. The aim of this proposal is to provide excellent communication service to the inhabitants of an area.
<u>The principle of spatial sustainability</u>	Given that cellular mast will not be erected on any property which is deemed environmentally sensitive, the mast will be placed strategically in locations where gaps in signal are prominent and in terms of longevity of these masts, they will be able to be used as part of new, sophisticated type of networks, to provide better services quality to the surrounding recipient. Given that a lot of people make use of cell phones and network to communicate,

	<p>having this type of infrastructure in place will allow for more effective communication within cities, towns and rural area. The general public expects and demand effective cellular telephone coverage.</p>
<p><u>Principle of Efficiency</u></p>	<p>In terms of integrating cities and towns, the strategic location of cellular mast will create an effective environment for people to work and communicate without any disruptions in signal which could begin to cause problems in terms of communication. Having such infrastructure in place will then also attract people to cities and towns where they may engage in business or leisure knowing that no telecommunication disruption may occur. Effective cellular telephone coverage is a requirement for daily necessity.</p>
<p>Principle of Spatial Resilience</p>	<p>Cellular telephone infrastructure is considered as infrastructure and forms part of the urban fabric. With more than 32000 cellular telephone masts in operation in South Africa today, it can be considered as part of the urban landscape and have spatial resilience in cities and towns, empirical analysis of real infrastructure networks has indicated that an optimal infrastructure network is one with the shortest average path length (APL) links between network operators. In the case of technical disruptions or electrical outage, other telecommunication receptors will be able to take over capacity of that area and will spring back into shape as soon as the disruption is gone.</p>
<p><u>Principle of Good Administration</u></p>	<p>As can be seen from the aforementioned is that all the necessary investigations, i.e. applications, CAA and EIA is undertaken for every site to ensure that an optimal position for a cellular telephone mast is identified. All required permits are then obtained from all relevant departments. When applying for permission/consent and/or building plan approval from the municipality, the correct channels are followed in terms of obtaining the necessary comments from the respective departments, notices of new construction is to be placed at the site in question, public participation is done to ensure that the adjacent land owners are</p>

	aware of the proposed development and they have a set period of time in which they may lodge any objections.
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## 6. CONCLUSION

The consent use application for the proposed Freestanding Base Telecommunication Station on Portion 41 of the Farm Ronde Valley No. 187 District George. We would like to emphasise the positive contribution this base station will have on the immediate area, as well as the surrounding community and passing commuters and specifically the guest/visitors making use of Pine Lake Marina Resort:

- This proposed minor development comprises a 14.99m Tree type mast, triband antennae (3), Transmission Dishes and equipment container;
- No additional access points or power connections will be required to support this installation;
- This application is in line with the statement made by the National Department of Health on 19 January 2018
- This proposed installation complies with the Knysna Municipality Policy for the Placing, Size and Appearance of Cellular Communication Masts, 2008;
- Eradication of poor network coverage three of the four Major Network Operators (i.e. MTN, Vodacom and Telkom);
- Alternative sites (rooftops options) where considered, however this site posed as the best option in terms of mobile coverage;
- The installation will promote accessibility to emergency services (e.g., Ambulances, Police and Fire Departments)
- Social integration will be promoted by this installation. The guest or holiday makers using Pine Lake Marina Resort depend on the services of the cellular telecommunication providers, including internet and voice calls.

Finally, we would like to emphasise that communication companies deliver an important service to the wider public, and in terms of their licences with ICASA they have to meet certain standards in order to retain their licenses. One of these standards is to supply adequate network coverage to their demanding customers. The proposal also allows for all other service providers to share this installation and refrain from constructing another base station in this area.

The application has been proven to be desirable and it is hereby kindly requested that the Knysna Local Municipality provide their full support and approve the following:

- i. **Consent Use Application** in terms of Section 15(2)(o) of the Knysna Municipality: Spatial Planning and Land Use Management By-Law 2021, to allow the construction of a freestanding base telecommunication station with a 14.99m tree type mast on Portion 41 of the Farm Ronde Valley No. 187 District George.

**Annexure A**  
**Power of attorney**

**Annexure B**  
**Company Resolution**

**Annexure C**  
**Lease Agreement**

**Annexure D**  
**Copy of Title Deed**

**Annexure E**  
**Surveyor General Diagram**

**Annexure F**  
**Zoning Certificate**

# **Annexure G**

## **Environmental Authorisation**