4.3

ERF 1849, 20 INDUSTRY CLOSE, GANSBAAI: PROPOSED DEPARTURES: MESSRS WARREN PETTERSON PLANNING TOWN- AND REGIONAL PLANNING CONSULTANTS (WPP) ON BEHALF OF EM BRITZ

1849 GIP (4196)
SW van der Merwe **(028) 313 8900** **Hermanus Administration**
16 September 2019

1. EXECUTIVE SUMMARY

An application has been received on 19 October 2018 from Messrs Warren Petterson Planning Town- and Regional Planning Consultants (WPP) on behalf of EM Britz in terms of Section 16(2)(b) of the Overstrand Municipality By-Law on Municipal Land Use Planning, 2015 (By-Law) applicable to Erf 1849, Gansbaai for the following:

- departure of the 2m rear building line onto the property boundary;
- encroachment of the height restriction from 12m to 25m, and
- encroachment of the height restriction applicable to boundary walls from 2,1m to 2,4m for the installation of a proposed transmission tower and associated equipment compound.

A Locality Plan of the property concerned is attached as Annexure A. Motivation Report from the applicant in support of the proposal is attached as Annexure B and the Site Development Plan (SDP) is attached as Annexure C.

2. DECISION AUTHORITY

Municipal Planning Tribunal

3. BACKGROUND / SITE HISTORY

The subject property is situated within the Gansbaai industrial area and is zoned for Industrial Zone 1: General Industry purposes. The subject property measures 3002m² in extent, and is developed with single storey industrial buildings currently utilised for self-storage purposes. The property is subject to a 4m wide servitude, running parallel with the northern property boundary.

The applicant proposes to install a 25m high transmission tower (lattice mast) with associated equipment compound comprising of 4 x 3 sector antennas, microwave dishes, 4 x equipment containers and a 2,4m high palisade fence. The transmission tower and equipment compound will be situated on the rear property boundary. The SDP indicates that the proposal will not encroach into the area of the servitude.

4. SUMMARY OF APPLICANT'S MOTIVATION

The main grounds of motivation are summarised as follows (the detailed report is attached as Annexure B):

- The proposal is consistent with the planning principles in terms of LUPA and SPLUMA.
- The proposal is consistent with the IDP (promote tourism & better coordination with reference to disaster management).

- Cellular communication in recent years evolved from a merely a means of convenience to an essential business tool, means of communication and safety measure.
- Changing user behaviour patterns resulting in consumer data usage doubling each year.
- New generation LTE base stations have a maximum coverage range of 500m, depending on the number of users.
- The proposed site is located at the nominal point, limiting the number of future sites and ensuring an effective network.
- In modern day society the dependency on communicative technology becomes increasingly higher due to society's utilization of more mobile devices and more than one device per household which mainly rely on internet connectivity.
- Due to factors including densification, urbanization and influx of seasonal guests over festive seasons and holidays in a tourist attractive place dropped calls and poor network coverage (related to both voice and data) are experienced.
- This application is motivated by several customer complaints from residents, businesses and commuters received by MTN, Vodacom and Cell C in and around the area of Gansbaai.
- MTN, Vodacom and Cell C identified several positions in the area that need to be equipped with base stations to alleviate the pressure and to cater for the ever increasing demand.
- The increase in network strength 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 base station will be erected at a cost of approximately R1,5m. These high costs are a very good reason to rather co-locate on existing free standing base stations or to settle for a rooftop base station in lieu of building a new free standing base station.
- The mix of land uses range from low density residential to open space.
- The proposed base station 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 base station and no buildings with heritage value will be affected.
- The proposal will have no impact on external engineering services, on transport or traffic related considerations, or on the biophysical environment.
- Every possible measure has been taken to make the design as aesthetically pleasing as possible.
- Network upgrade is aimed at residential users to improve network coverage and quality as well as areas with tourism and economic potential.
- Coverage is not the only determining factor when need is considered, but also zoning, altitude, visual impact being other determining factors.
- Alternative sites were considered (Gousblom- & Buitekant Streets) during the initial stages of the proposal, but will not provide the required coverage.
- The site was selected as it present the optimum location, huge demand and existing installations being unable to provide an acceptable level of coverage, the site is accessible to contractors, best location to solve the coverage problem and to serve the complaint area.
- The proposal will create an opportunity for co-location.
- The proposed installation comprises a lattice mast, colour code to match the background, creating a see through effect which is considered acceptable in an industrial location.

- ❖ Currently scientific research is yet to produce conclusive evidence suggesting adverse health effects associated with, working with or living close to cellular technology.
- ❖ Communications companies deliver an important service to the wider public and in terms of their licence with ICASA they have to meet certain standards to retain their licence of which one is to supply adequate network coverage to their customers.

5. ADMINISTRATIVE COMPLIANCE

Methods of advertising		**Date published**	**Closing date for comments**
Local newspaper	**Yes**	28/02/2019	29/03/2019
Notices	**Yes**	19/02/2019	29/03/2019
Ward councillor	**Yes**	19/02/2019	29/03/2019
Total objections	**None**		
Total letters of support	**None**		
Was public participation undertaken in accordance with Section 46 - 50 of the By-Law on Municipal Land Use Planning?			**Yes**
Was the application processed correctly (if no, elaborate below):			**Yes**
Is the proposal consistent with the principles referred to in Chapter 2 of SPLUMA and Chapter VI of LUPA? (can be elaborated further below)			**Yes**

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

Name	**Date received**	**Summary of comments**	**Recommendation**
Fire Services	28/02/2019	No objection.	Positive
Building Department	08/03/2019	Supported subject to the submission of building plans in compliance with SANS10400. As it is in an industrial area the impact is minimal.	Positive
Environmental Services	22/03/2019	No objection.	Positive
Engineering Services	01/04/2019	Annexure D.	Positive
District Health	04/04/2019	No comment.	Positive
Telkom	31/05/2019	Annexure E.	Positive

7. SUMMARY OF COMMENTS RECEIVED DURING PUBLIC PARTICIPATION

No objections were received during the public participation process.

8. SUMMARY OF APPLICANT'S REPLY TO COMMENTS

Not applicable.

9. MUNICIPAL ASSESSMENT OF COMMENTS

Not applicable.

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

10.1 Background

Not applicable.

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

The application is in line with the planning objectives applicable to this application.

The objectives relating to:

Spatial Justice
The application will not further perpetuate spatial injustices since excellent communication services will be provided to the inhabitants of the area.

Spatial sustainability
Enhanced data signal will promote all three aspects of sustainability (social, economic and environmental aspects). Economically businesses will benefit due to enhanced connectivity, social facet via improved access to emergency services and environmentally the installation provides for co-location, limiting the amount of base stations required.

Efficiency
The installation is located to ensure optimal placement promoting effectiveness.

Spatial resilience
Communication is always necessary and in a state of crises communication plays an integral role in a societal environment.

Good administration
The application followed the required planning procedures and a good public participation process has 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 Point 10.2 above.

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

Consistent with the IDP and Spatial Development Framework.

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

Not applicable.

10.6 Impact on Municipal engineering services

The existing services are available and have been viewed positively by the Engineering Department.

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

Not applicable.

10.8 Existing and proposed zoning comparisons and considerations

The Overstrand Zoning Scheme Regulations provide for telecommunication installations as a primary right, subject to compliance with the applicable development parameters, amongst others the following:

Height restriction:	12m from base level
Building lines:	2m side and rear
Boundary enclosure:	2,1m height restriction

10.9 Additional Planning Motivation For Removal of Restrictive Condition

Not applicable.

11. THE DESIRABILITY OF THE PROPOSAL

The subject property is situated within the industrial area of Gansbaai. The surrounding area is characterised by industrial buildings, mostly single storey, subject to an overall 12m height restriction.

The industrial area has a prominent location, adjacent east of the R43 towards Franskraal, which is designated as a scenic route in terms of the SDF. In addition the area is sensitive to views from the CBD, the south eastern approach from Kleinbaai, Masakhane to the east and smallholdings adjacent to the R43.

The subject property is located on the eastern side of the industrial area with access of Industry Circle. The base of the proposed installation and equipment compound is thus screened from distance views. The building line and boundary wall height encroachments thus only have a local impact which is not considered unacceptable.

Having had regard to the context explained above, the proposed 25m high installation in an area characterised by buildings with a maximum height of 12m (industrial area) is considered to appear overbearing and out of keeping with the character of the area and would detract from the aesthetic quality of the scenic link route. The opinion is held that the visual impact of a single taller

installation that will facilitate co-location does not outweigh the visual impact of the proposed installation on the surrounding area. The relaxation of the 12m height restriction to 25m is therefore not considered to be desirable.

The applicant's motivation for the proposed installation states that there are several customer complaints from residents, businesses and commuters regarding dropped calls and lack of coverage, but did not provide any substantive proof, thus failing to demonstrate the need for the proposed telecommunication tower. Figure 9 on p17 and Figure 10 on p18 of the applicant's motivation report indicates that there is very limited LTE coverage for Cell C and fixed LTE coverage for MTN. It should be noted that the network coverage maps of the service providers such as MTN, Vodacom and Cell C, available on the internet on 16 September 2019 at the following websites:
https://www.vodacom.co.za/vodacom/coverage-map
https://www.mtn.co.za/Pages/Coverage_Map.aspx
https://www.cellc.co.za/cellc/coverage-map
indicate that coverage is available for 2G, 3G, 4G and LTE services and is in direct contradiction with the information provided within Figures 9 and 10 as referred to above. Further, the applicant also did not provide any substantive evidence indicating that coverage is below standard apart from a statement allegedly referring to customer complaint residents, businesses and commuters regarding dropped calls and lack of coverage. The opinion is therefore held that the applicant did not demonstrate the need for the proposed transmission tower and the relaxation of the height restriction to 25m in order to provide the desired coverage.

The historic building plans had been considered. The proposed transmission tower and associated equipment compound, situated on the rear boundary will not interfere with the use of the property in accordance with the applicable primary rights.

In conclusion the above proposed development is not supported.

12. RECOMMENDATION

1. that the application for departure in terms of Section 16.(2)(b) of the Overstrand Municipality By-Law on Municipal Land Use Planning, 2015 (By-Law) for the encroachment of the 2m rear building line onto the property boundary, encroachment of the 12m height restriction to 25m and encroachment of the 2,1m height restriction applicable to boundary walls to 2,4m to accommodate a proposed transmission tower and associated equipment compound **not be approved** in terms of the provisions of Section 61 of the By-Law;

2. that the applicant be notified of its appeal right in terms of Section 78 of the Overstrand Municipality By-Law on Municipal Land Use Planning, 2015 with regard to the above decision.

13. REASONS FOR RECOMMENDATION

- The proposed transmission tower will appear overbearing and out of keeping with the character of the surrounding area.

- ❖ The visual impact of the proposed transmission tower will detract from the aesthetic quality of the scenic route.
- ❖ The applicant failed to provide substantive evidence pertaining to the need of the proposed transmission tower.
- ❖ Coverage maps from network operators do indicate available LTE coverage.
- ❖ The applicant failed to provide substantive evidence pertaining to customer complaints with reference to below standard coverage, dropped calls, etc.

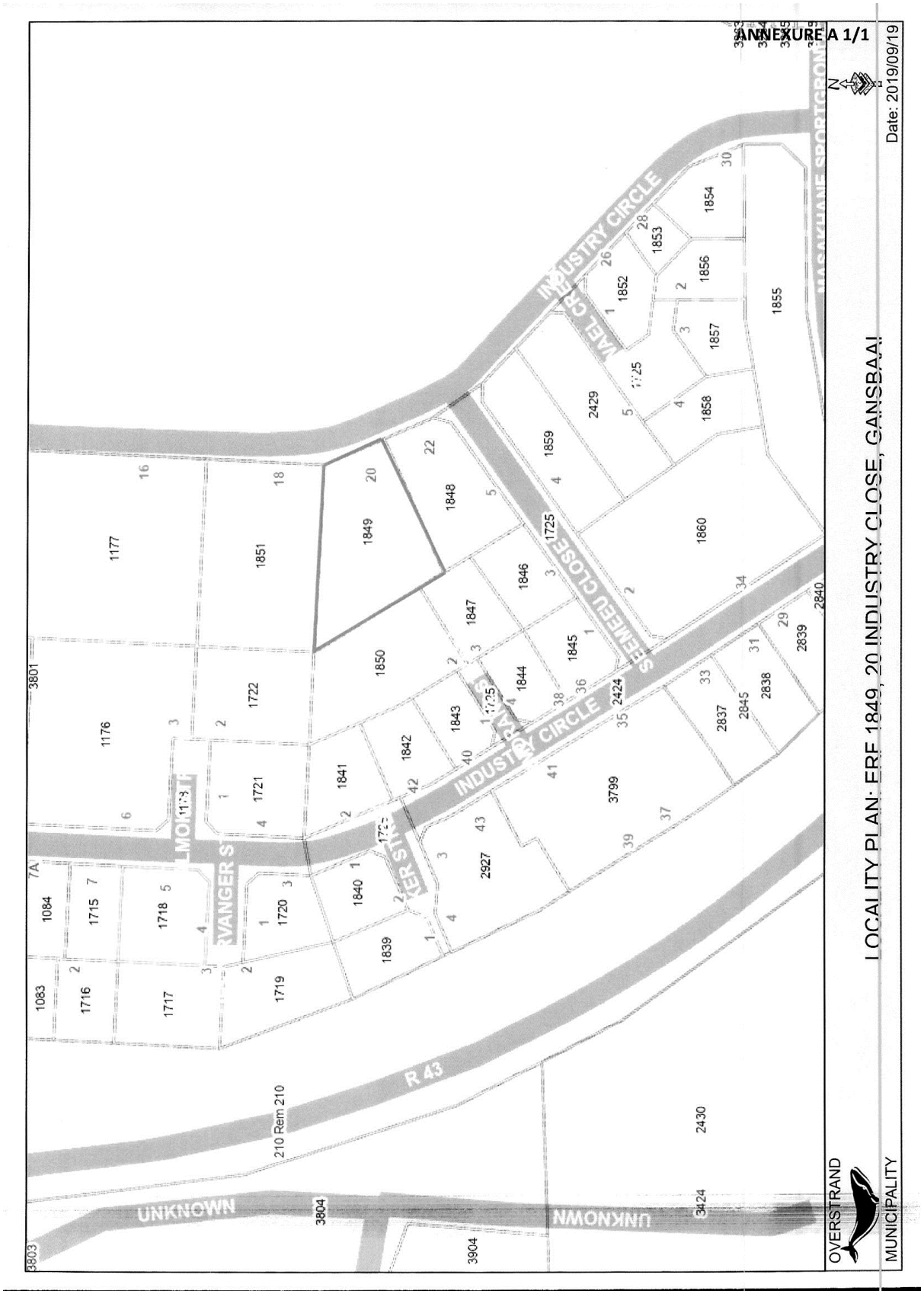
14. Annexures

Annexure A:	Locality Plan
Annexure B:	Motivation Report
Annexure C:	Site Development Plan
Annexure D:	Services Report
Annexure E:	Comment: Telkom

SIGNATURES

REGISTERED PLANNER:

Name :	**S VAN DER MERWE**
SACPLAN Reg No:	**A/1850/2014**
Signature :	_____
Date:	_____


ANNEXURE A 1/1
LOCALITY PLAN: ERF 1849, 20 INDUSTRY CLOSE, GANSBAAI
Date: 2019/09/19
OVERSTRAND
MUNICIPALITY
INDUSTRY CIRCLE
INDUSTRY CLOSE
R 43
UNKNOWN
UNKNOWN
1849
1848
1850
1851
1177
1176
1722
1721
1841
1842
1843
1844
1845
1846
1847
1859
2429
1860
1852
1853
1854
1855
1856
1857
1858
2424
3799
2927
2430
1839
1840
1719
1720
1715
1716
1717
1718
1084
1083
2839
2840
2838
2837
2845
3801
3803
3804
3904
3424
210 Rem 210

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

T: (021) 552 5255
F: (086) 537 9187
C: (084) 551 0045
E: wessel@wpplanning.co.za

SECTION A: BACKGROUND

A.1. THE APPLICATION

Application is hereby made for the following:

- ✓ **Permanent Departures** regulation in terms of section 16(2)(b) of the Overstrand Municipality By-law on Municipal Land Use Planning, 2015 for the purpose of the relaxation of the rear building line from 2m to 0.0m in order to allow for the proposed transmission tower.

- ✓ **Permanent Departures** regulation in terms of section 16(2)(b) of the Overstrand Municipality By-law on Municipal Land Use Planning, 2015 for the purpose of the relaxation of the height restriction from 12m to 25.0m in order to allow for the proposed transmission tower, as well as the relaxation of height restriction pertaining to fences of 2.1m to 2.4m in order to allow for the proposed 2.4m high palisade fence.

A.2. DETAILS OF THE DEVELOPMENT AREA

Table 3 - Details of the Development Area

TITLE DEED DESCRIPTION	ERF 1849, GANSBAAI, WESTERN CAPE PROVINCE.
TITLE DEED NUMBER	T18442/2005
PROPERTY SIZE (m^2)	$3002m^2$
CURRENT ZONING (per OMIZS, 2013)	INDUSTRIAL ZONE 1: GENERAL INDUSTRY
OWNER OF PROPERTY	ELIZABETH MARIA BRITS

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

T: (021) 552 5255
F: (086) 537 9187
C: (084) 551 0045
E: wessel@wpplanning.co.za

SECTION B: CONTEXTUAL INFORMANTS

The following section includes information relating to the locality, current land use, zoning and surrounding area.

B.1. LOCALITY

The property within the Municipality of Overstrand is located directly adjacent Industry Circle.

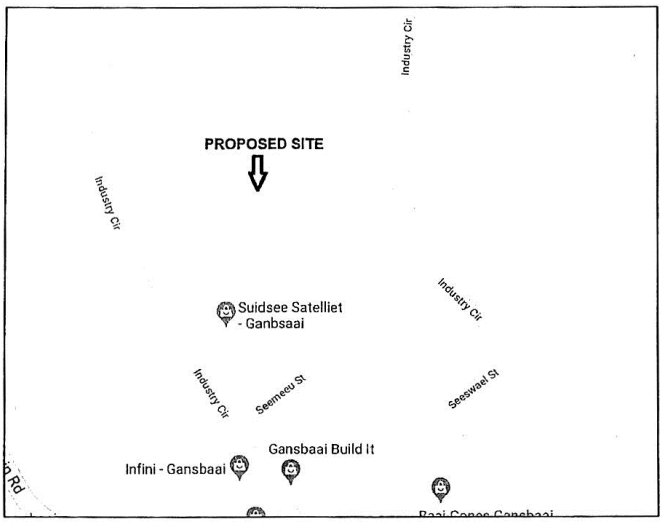


Figure 1 - Location of the property adjacent to Industry Circle.

B.2. CURRENT LAND USE AND ZONING

Table 4 - Current land use and zoning

CURRENT LAND USE	The property is being utilised as a storage facility.
ZONING	Industrial Zone 1

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

The property in question with the zoning of 'Industrial Zone 1: General Industry (IND1) has the following primary rights and rights by means of a consent use application:

INDUSTRIAL ZONES INDUSTRIAL ZONE 1: GENERAL INDUSTRY (IND 1)	FLOOR FACTOR	COVERAGE	MAXIMUM HEIGHT MEASURED FROM THE BASE LEVEL	BUILDING LINES			STREET CENTRE-LINE SETBACK	OTHER PROVISIONS
			To Top of Roof	Street building line	Side building line	Rear building line		
PRIMARY USES Industry, agricultural industry, builder's yard, care taker's accommodation, factory shop, funeral parlour, heavy vehicle service station, industrial café, motor repair garage, rooftop base station, service trade, service station, transmission tower, transport use, utility services, warehouse, wholesale business, workshop **CONSENT USES** abattoir, aquaculture, adult entertainment business, business premises, container site, crematorium, dwelling unit, informal trading, mining, noxious trade, place of assembly, place of entertainment, place of instruction, restaurant, sale of alcoholic beverages, scrap yard, scrap yard	2	75%	12,0m Other: With consent from Council Earth banks and retaining structures shall comply with 16.6	5,0m Refer to 8.1.2(d)	2,0m Or abutting zone Refer to 8.1.2(d)	2,0m Or abutting zone Refer to 8.1.2(d)	8,0m Refer to 16.2	Boundary walls, parking and access, loading bays, screening, factory shop, service station, environmental considerations, site development plans

Figure 2 - Industrial Zone 1: General Industry (IND1)

TOWN AND REGIONAL PLANNING CONSULTANTS

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

B.3. SURROUNDING AREA

Suburbs near the property are Masakhane (Eastern direction), Blompark (Southern Western Direction), and Gansbaai (North Western Direction).

The R43 to the west and south of the property serve as the main distributor in the area. The land uses in the immediate surrounding area are predominantly utilised for industrial purposes.

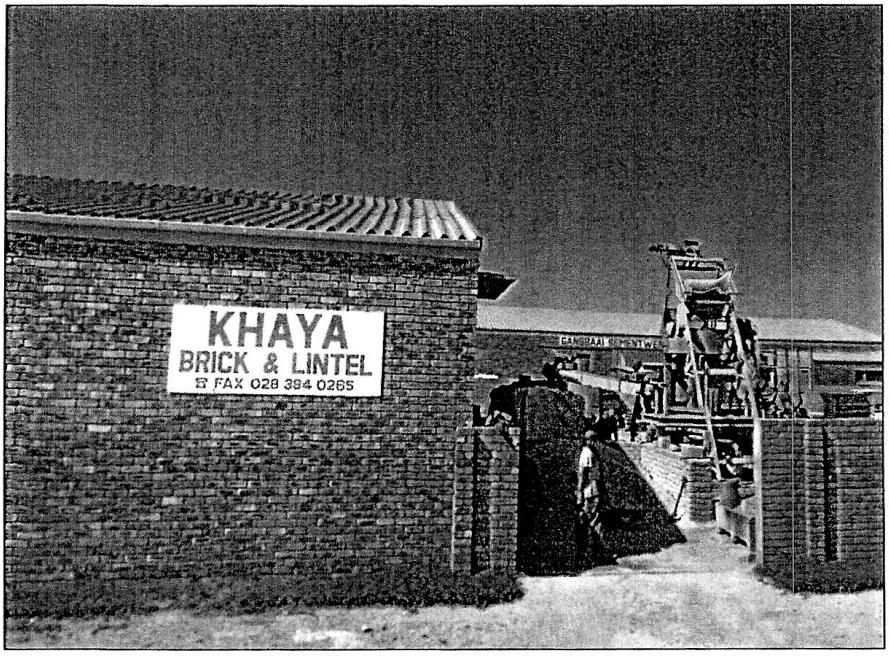


Figure 3 – Property located to the south utilised for industrial purposes.

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

T: (021) 552 5255
F: (086) 537 9187
C: (084) 551 0045
E: wessel@wpplanning.co.za

SECTION C: DEVELOPMENT PROPOSAL

C.1. APPLICATION SPECIFICATIONS

The client (Atlas Tower) wishes to apply for permanent departures (relaxation of height restriction and building lines) in order to erect a transmission tower.

C.1.1 Development Concept

The application comprises the following proposed development parameters:

- ✓ A 25m lattice type mast,
- ✓ 4 x 3-sector antennas attached to the mast,
- ✓ Microwave dishes attached to the mast,
- ✓ 4 x Equipment containers, and
- ✓ A 2.4m high palisade fence.

The total ground coverage of the transmission tower 72.43m².

C.1.2 Building Line Relaxation

In terms of the property's zoning of 'Industrial Zone 1: General Industry', side and rear building line restrictions of 2m are applicable. The transmission tower is proposed in the north western corner of the property within the 2m side and rear building lines.

(d) **Building lines**

(i) The street building line shall be 5,0 m;
(ii) The side and rear building line shall be 2,0 m;
(iii) Where a land unit abuts a zone that is not an industry zone, the building lines of the particular zone, whichever is the greater shall apply;

Figure 4 - Building Lines for 'Community Zone 1: Community Facilities' (OMIZS, 2013)

A **permanent departure** application is hereby made regulation in terms of section 16(2)(b) of the Overstrand Municipality By-law on Municipal Land Use Planning, 2015 for the relaxation of the **side and rear** building lines of Erf 1849, Gansbaai from 2m to 0.0m to allow for the erection of a transmission tower.

The transmission tower is positioned within the building line. However, this will not obstruct the existing utility services, landscaping etc.

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

C.1.3 Height Restriction Relaxation

In terms of the property's zoning of 'Industrial Zone 1: General Industry', a maximum height above base level of 12m to top of roof (please read together with the OMIZS, 2013:68). The transmission tower is proposed at a height of 25m.

(c) **Height**

(i) The maximum height of any building measured from the base level to the top of the roof is 12,0 m, provided that;
(ii) Where a structure of greater height is required for the industrial function of the property, Council may grant approval for such greater height; and
(iii) The general provisions relating to retaining structures and earth banks in 16.6 apply.

Figure 5 - Height restrictions (OMIZS, 2013:68)

A **permanent departure** application is hereby made in terms of section 16(2)(b) of the Overstrand Municipality By-law on Municipal Land Use Planning, 2015 for the relaxation of the height restriction of Erf 1849, Gansbaai **from 12m to 25m** to allow for the erection of a transmission tower.

The FSBTS is exceeding the current maximum height above base level with 13m. However, this will not obstruct the existing utility services, landscaping etc.

The mast will not intrude on the privacy rights of any of the surrounding property owners. No security camera will be placed on the mast which can overlook onto any other properties.

Please note that the fences are produced at a standard height of 2.4m. Accordingly, an additional permanent departure in terms of section 16(2)(b) of the Overstrand Municipality By-law on Municipal Land Use Planning, 2015 is applied for in order to allow for the relaxation of the height restriction relating to boundary walls from 2.1m to 2.4m.

C.2. ACCESS

Access to the proposed transmission tower will be obtained via the existing access point to the property, situated adjacent to the Industry Circle.

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

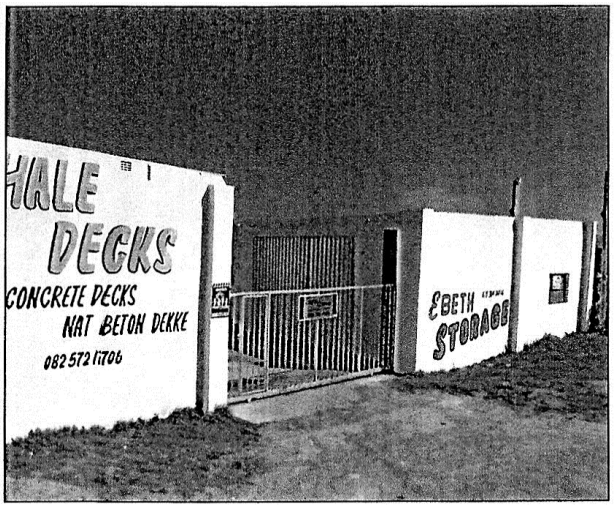


Figure 6 - Access to site

C.3. SECURITY

The entire base station site will be surrounded by a 2.4m tall Palisade fence with an access gate that will be locked at all times. The proposed equipment will be secure inside the equipment units that will be kept locked at all times. The antennae will be secure given their position at the top of the mast.

These measures rule out the possibility of any public access to the equipment and serve to protect the equipment from being vandalized. Similar security measures are implemented at similar installations and have proved to be very effective.

C.4. POWER

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

C.5. ENVIRONMENTAL REGULATIONS

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

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

the National Environmental Management Act Regulations Listing Notice 3 of 2017 (promulgated 08 December 2014), an Environmental Impact Assessment (EIA) or Environmental Authorization (EA) is only applicable in the following circumstances:

Listing Notice 3, Activity 3: The development of masts or towers of any material or type used for telecommunication broadcasting or radio transmission purposes where the mast or tower;

(a) is to be placed on a site not previously used for this purpose; and

(b) will exceed 15 metres in height,

but excluding attachments to existing buildings and masts on rooftops.

In the 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, or
III. Areas zoned for use as public open space or equivalent zoning within urban areas.

The subject property is situated within the urban area and an Environmental Authorization (EA) is therefore not required.

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

T: (021) 552 5255
F: (086) 537 9187
C: (084) 551 0045
E: wessel@wpplanning.co.za

SECTION D: POLICY AND LEGISLATION

D.1. SPATIAL PLANNING AND LAND USE MANAGEMENT ACT, 2013

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

Table 5 - Compliance of application with Principles 7a-7e of SPLUMA, 2013

	HOW DOES THIS APPLICATION COMPLY WITH THIS PRINCIPLE?
Principle 7a: Spatial Justice	In a broader sense, spatial justice refers to an intentional incorporation of spatial (geographical) aspects. This refer to the fair and equally distributed services and enhanced accessibility of these services. The aim of this proposal is to provide excellent communication service to the inhabitants of an area.
Principle 7b: Spatial Sustainability	Spatial sustainability is an explicit concept which describe the relations between environmental, economic and socio-cultural facets related to a societal environment. Enhanced signal in an area will promote all three the dimensions of sustainability (economic, social and environmental facets). Economically, businesses in the area will benefit from enhanced connectivity. The social facet is addressed as more people will have access to emergency services (e.g. Healthcare, Police, Fire response etc.). The third dimension (Environmental facets) will be promoted as the sensible placement of telecommunication base stations and the possibility of co-location will limit the amount of base stations should there be sufficient signal in an area.
Principle 7c: Spatial Efficiency	Spatial efficiency relates to the concept of minimum distance to be travelled between a specific location and intended destination. FSTBS and RTBS is placed in an area (optimally situated between planned and existing stations) with a reason. This reason is to incorporate various factors (e.g. amount of users, quality of service etc.) when considering the placement in order to promote effectiveness and is not merely placed by random.
Principle 7d: Spatial Resilience	Spatial resilience can be defined as the ability of a region to withstand possible arising shocks (e.g. economic crisis, social disruptions etc.). However, FSTBS and RTBS will be a service that will always be necessary. In a state of crisis, communication plays an integral role in a societal environment.
Principle 7e: Good administration	This installation will be lawful and reasonable, following an equal and fair public participation process in order to incorporate the views and opinions of all relevant parties.

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

D.2. INTEGRATED DEVELOPMENT PLAN, 2014

The IDP (2014) refers to the enhancement of TI in order to provide the Overstrand Municipal area with enhanced communicative technologies especially with regard to fibre-optic communication connectivity required for a pro-poor Tourism as stipulated on page 90 (IDP, 2014.)

> The International Centre for Responsible Tourism advocates "Pro-poor Tourism" – an approach towards tourism which ensures that "local poor people are able to secure economic benefits from tourism in a fair and sustainable manner Robson, S and Higton, S, 2004). Pro-poor tourism can benefit local poor people in three ways: It can bring economic gain through employment and micro-enterprise development; infrastructure such as roads, water and electricity supply, telecommunications and waste management can be improved; and poor people can be engaged in decision-making.

Figure 7 - Extract: PAge 90 of the OMIDP, 2014

Furthermore, improved TI will contribute to the better coordination of Disaster Management as it will allow emergency service to be contacted and connected to any area in distress when needed – as stipulated on page 230 of the OMIDP, 2014.

> 12.2.3 DISASTER MANAGEMENT COORDINATOR:
>
> a. Establish and maintain required telecommunications links
> b. Identify available resources for disaster management purposes,
> c. Establish and maintain a resources database.
> d. Ensure effective media liaison.
> e. Coordinate all communication to and from incident.
> f. Compilation of pro-active departmental disaster management programmes to support risk reduction or elimination.
> g. Rendering support and advice throughout all phases of disaster management planning activities,
> h. Disaster Management Plan forms an integral part of the IDP,

Figure 8 - Extract: Page 230 of the OMIDP, 2014

This application is in line with this vision of the Overstrand Municipality as the TI installed on the said property will provide these sought-after services (e.g. Pro-poor Tourism and Disaster Management).

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

SECTION E: MOTIVATION

This section is seen as the motivation of the application as it provides information with regard to the need and desirability, development parameters, site characteristics, visual impact, health and safety and alternative candidates relating to this specific application.

E.1. BACKGROUND

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 communications 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 networks 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. MTN, Vodacom and Cell C 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 alleviates the pressure on the base station, however its range is very limited. A single old generation GSM voice based base station could cover dozens of kilometres. The new LTE base stations have a maximum coverage range of 500m depending on the number of users.

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

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 network planners. By utilizing sites located at the networks' nominal points the number of future base stations is limited and an effective service network can be developed.

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

T: (021) 552 5255
F: (086) 537 9187
C: (084) 551 0045
E: wessel@wpplanning.co.za

E.2. DEVELOPMENT MOTIVATION

Please read together with previous sections in this application. This height restriction relaxation and building line departures in order to allow for the erection of a transmission tower should be supported based on the following grounds:

E.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 the Gansbaai, dropped calls and poor network coverage (related to both voice and data) are experienced. This application is motivated by several customer complaints (from residents, businesses and commuters) received by MTN, Vodacom and Cell C in and around the area of Gansbaai. MTN, Vodacom and Cell C identified several positions in the area that need to be equipped with base stations to alleviate the pressure and to cater for the ever-increasing demand.

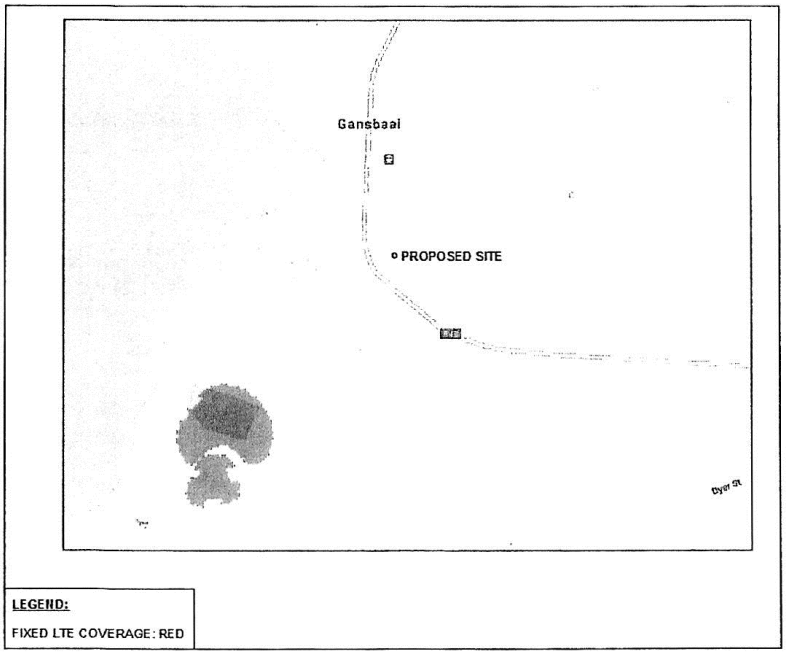


Figure 9 - MTN Fixed LTE Coverage in Gansbaai

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

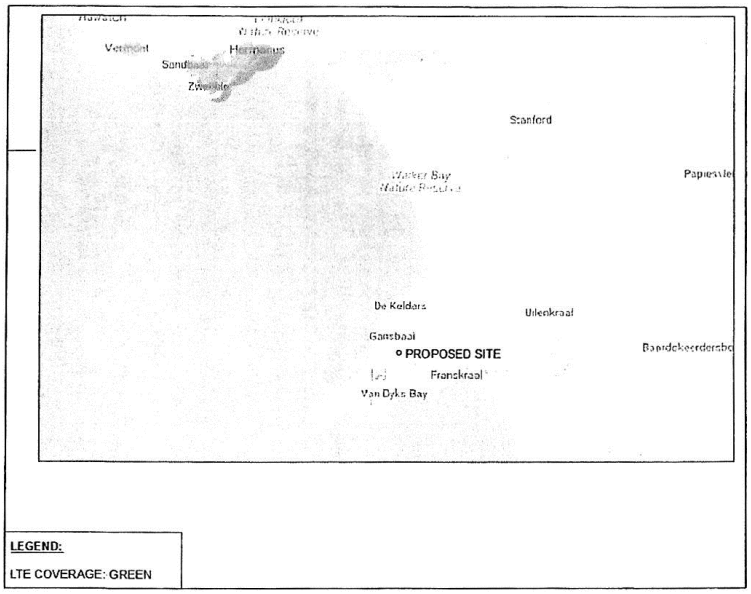


Figure 10 - Cell C LTE Coverage for the Overstrand area (Gansbaai)

Figures 9 and 10 illustrate the current coverage in Gansbaai. It should be noted that some areas have very limited LTE coverage. Therefore, a FSBTS as proposed in this application will increase the amount of coverage in this area (*Refer to the website https://www.cellc.co.za/cellc/coverage-map for coverage maps*).

The increase in network strength brought by the proposed FSBTS 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 FSBTS will be erected at a cost of approximately R1.5mil. These high costs are a very good reason to rather co-locate on existing transmission towers or to settle for a rooftop base station in lieu of building a new transmission tower.

The mix of land uses range from low density residential to open space. The proposed base station 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 base station and no buildings with heritage value will be affected.

The proposed use will have no impact on the external engineering services, on transport or traffic related considerations, or on the biophysical environment. Every possible measure has been taken to make the design as aesthetically pleasing as possible.

It is our submission that the proposed use will have no detrimental impact on the surrounding properties and will provide an essential service to the surrounding community.

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

E.2.2. Site selection methodology

The current roll out of telecommunication infrastructure by cellular network providers is undertaken to upgrade and improve network coverage and quality to all customers. Telecommunication networks experience peak demand in the evenings between 18:00 and 23:00. This is because during these times people are at their homes and use internet intensive devices. Thus, a large portion of the network upgrade is aimed at residential areas. Business and other activity areas have been prioritised over the past 20 years, for commercial reasons and given the fact that legislation and policies steered proposals of this nature, towards non-residential areas. Due to the tourism value of the said area, upgrading the coverage of LTE, 4G technology and accessibility to Fibre will be beneficial for Gansbaai within the Greater Overstrand area. This area includes tourist and economic attractions which include wineries, estates and route towards tourist destinations along the coast. Telecommunication networks experience peak demand in the holidays and festive seasons. Thus, a large portion of the network upgrade is aimed at areas with tourism and economic potential.

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.

E.2.2.1. Choice of site

These points are selected because of an increase of customer complaints, within an area. As an increase in the number of users occurs, the area which is covered by the existing network decreases, leading to poorer network coverage. Figures 11-13 strive to explain how the need for an increase in cellular infrastructure evolves in a typical urban area.

Cellular infrastructure explained:

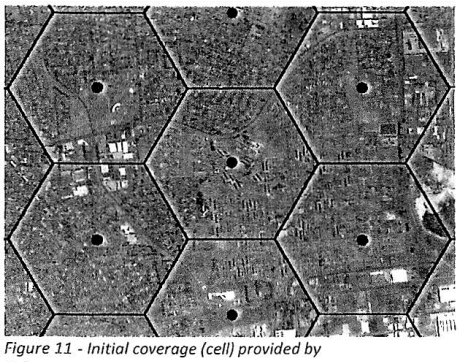


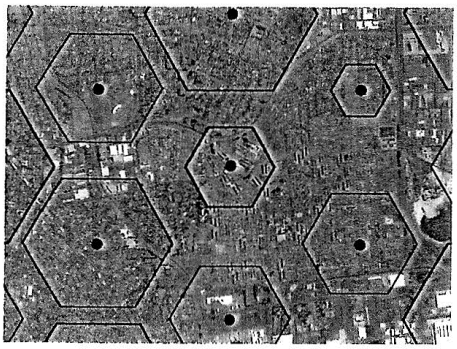
Figure 11 - Initial coverage (cell) provided by Telecommunications Base Stations

Figure 11 is an illustration of optimum network and data coverage. This is explained by envisioning the octagonal shape of a honeycomb (cells).

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

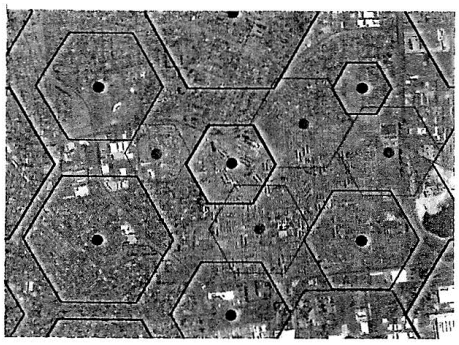
Warren Petterson Planning
P.O. Box 152
Century City
7446

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



As network users increase, the cells shrink which leads to gaps within this network of cells. This leads to dropped calls, weak/ limited signal and the failure to access the latest technologies in communication innovations.

Figure 12 - Coverage decreases due to increases in network users - cell size decreases



Gaps between cells require new/additional telecommunication base stations to be placed in these gaps to retain good network coverage

Figure 13 - Additional telecommunications base stations required to fill the gaps

Locations for telecommunication infrastructure are primarily chosen within areas where a need exists for coverage (refer to Figure 12). If a need for coverage does not exist in a specific area, no company would invest capital to build a telecommunication base station in the said area. The fact that there are only a few telecommunication base stations in the surrounding area supports the statement that there is a clear need for coverage in the area.

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

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

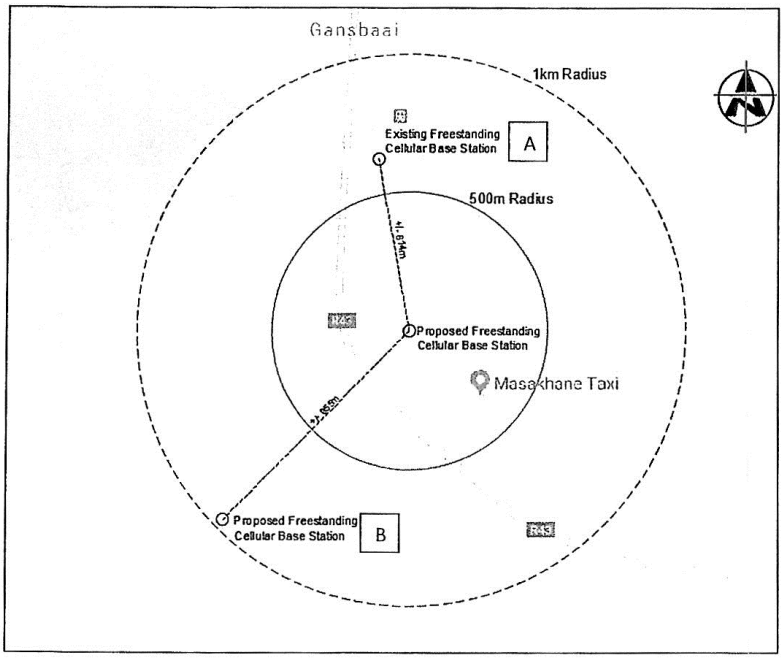


Figure 14 - Surrounding base stations

Table 6 - Surrounding base stations as alternatives

	FSTBS/RTBS	Site location	Distance	Lack of sufficiency
A	Transmission tower	Buitekant Street	+/-614m	Failure to provide for the necessary coverage necessity due to high number of cellular users in the area. The existing tower is experiencing congestion.
B	Transmission Tower (Proposed)	Gousblom Street	+/-955m	This proposed transmission tower is located approximately 955m, which means that the coverage area for the towers are not the same. This proposed tower will cover Blompark mostly.

Considering the information in Figure 14 and Table 6 the need for the proposed transmission tower is clear. Existing TI are not sufficient to provide coverage as the closest transmission tower is approximately 614m away from the proposed transmission tower, but it is experiencing congestion due to the upgrading of service such as LTE and the increase of cellular users over time.

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

E.2.3. Site characteristics

Special consideration is given to geographical aspects so that each base station is positioned to ensure optimum functionality. This reduces the number of base stations necessary to provide an optimal network. At the same time, special attention is also given to ensure that there is minimal impact on the local, social, physical, natural and visual environments.

This site was selected for several reasons, namely:

- It is situated optimally between planned and existing sites,
- There is a huge demand by cellular users in this area and the surrounding base stations are unable to provide an acceptable level of coverage to the area,
- It is accessible to contractors during construction and maintenance,
- The proposal and location of the base station is the best solution to the coverage problem of the area with the least negative impacts,
- The proposal is secure due to its locality, and
- Most importantly it will serve the complaint area (the area with the lowest levels of cellular reception due to locality and high volumes of users) optimally.

It is important to note that the nature of such development is dependent on a "willing landlord" scenario. The theoretically best position is determined by the radio engineers and the closest properties that adhere to the above guidelines are targeted. Often several properties are targeted before a willing landlord is discovered that terms can be agreed with.

E.2.4. Visual Impact

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

The impact of the site, proposed at the minimal height of 25m is designed as a lattice framework, as this creates a see-through effect, thereby reducing the visual impact. The industrial nature of the surrounding area also contributes to the mitigation of the mast.

In addition, the proposed equipment and mast can be colour coded to match the backdrop to further mitigate the visual impact and ultimately blend in with its surroundings.

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

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

E.2.5. Health concerns

There has been increasing public concern about health risks associated with cellular communication. Current scientific research is yet to produce conclusive evidence suggesting adverse health effects associated with, working with or living close to cellular technology. Although antennae and base stations emit radio waves, their frequency is not considered high enough to pose a health risk. Antennae mounted on towers, masts or any other structures are usually substantially elevated above ground level, and as radio waves are emitted at this level thereby further reducing the amount of radiation at ground level. Furthermore, regular tests regarding the compliance to safety regulations add to reducing the health risk factor.

South Africa's Department of Health has published EMF exposure limit guidelines. These are based on guidelines endorsed by the ICNIRP (International Commission on Non-Ionising Radiation Protection), an independent scientific organization established in 1992. Emissions from the base stations and antennae comply with these guidelines.

In a statement made by the Department of Health dated 14 October 2011 on the Health Effects of base stations states the following:

"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 height of the mast, distance to the mast, and duration of exposure."

There are no conclusive studies linking emissions at these levels to any health effects and scientific research that may reveal such a link is ongoing. The steps taken by the cellular communication companies to ensure the safety of the public against any possible harmful emissions, along with the above facts, concerns about health issues can be allayed.

SECTION F: CONCLUSION

We would like to emphasise the positive contribution this base station will have on the immediate area of Erf 1849, Gansbaai as well as the surrounding community and passing commuters:

- Most households in the surrounding area depend on the services of the cellular telecommunications providers, including internet and social networking media (Facebook, Twitter etc.). With such a high demand for their products, it follows that service providers are responsible for supplying a high level of network coverage.
- please note that the residents in the area are not the only ones being provided with these services. Visitors to the area, businesses and daily commuters will benefit by having access to improved communication facilities.
- Mobile communication has become an important safety and security element in modern society. In an emergency, such as housebreaking, medical alert or fire, a member of a household can quickly and easily contact the emergency services for help. However, if the

WPP
TOWN AND REGIONAL PLANNING CONSULTANTS

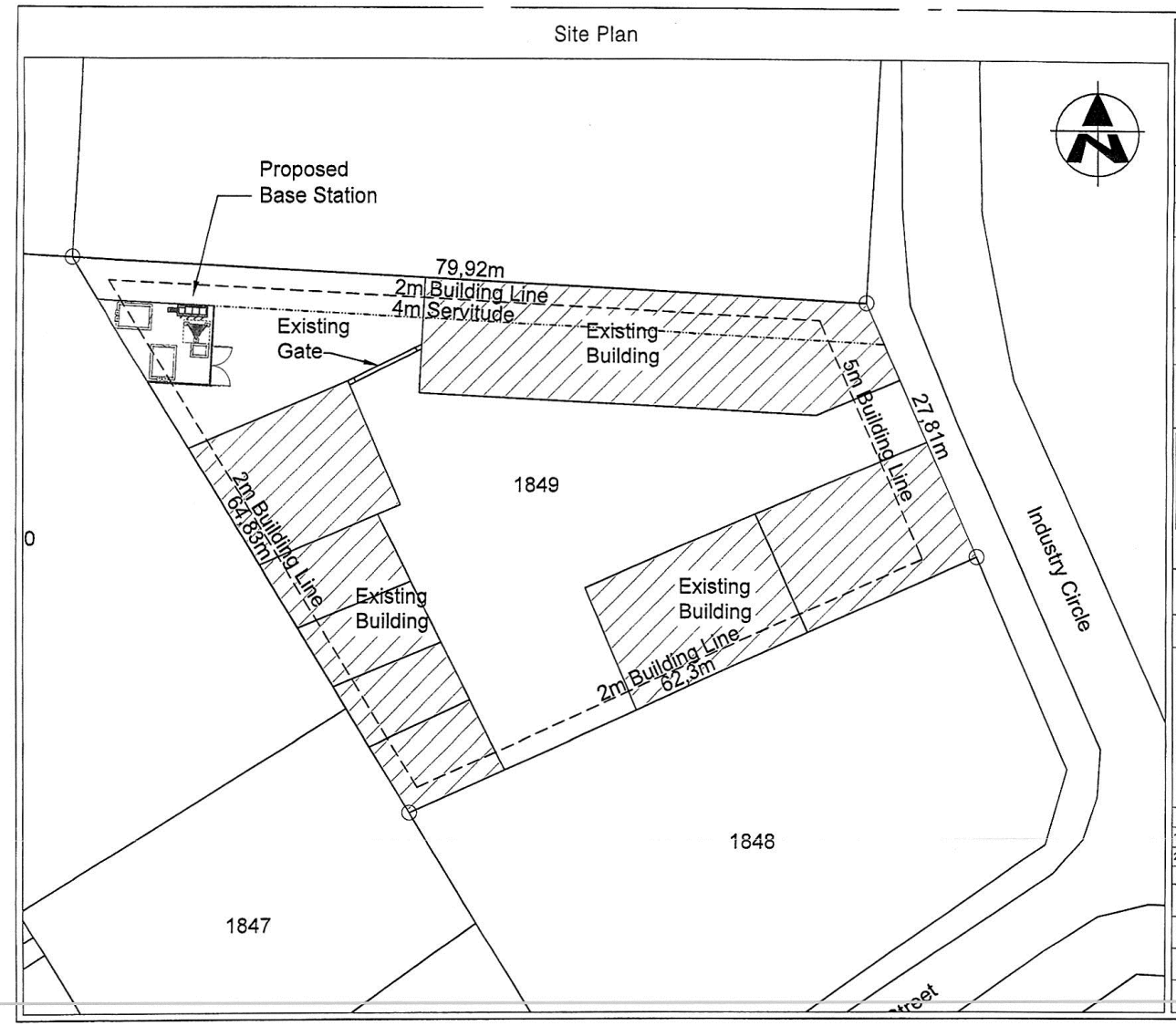
Warren Petterson Planning
P.O. Box 152
Century City
7446

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

coverage of mobile service providers' is poor, then contacting emergency services becomes a difficult task.

Finally, we would like to emphasize that communications companies deliver an important service to the wider public, and in terms of their license 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.

Please notify us should any additional information be required. We look forward to your positive consideration of this application.



ATLAS TOWER

ATLAS TOWER SITE ID:	ATSA533c
ATLAS TOWER SITE NAME:	GANSBAAI INDUSTRIAL
PROPERTY DESCRIPTION:	ERF 1849, GANSBAAI
ADDRESS:	INDUSTRY CIRCLE, GANSBAAI, WESTERN CAPE
CO-ORDINATES:	Lat: -34.590192° Long: 19.353792°
ELEVATION:	??m

VPP
TOWN AND REGIONAL PLANNING CONSULTANTS
Tel: (021) 552 5255 Fax: 086 537 9187
Unit H, 3rd Floor Matric Building, Bridgeway, Century City, Cape Town
Po Box 152, Century City, 7446

PROJECT:
PROPOSED NEW ATLAS TOWER 25m LATTICE MAST WITH 72.43m² BASE STATION

APPROVED MAST:
25m LATTICE MAST

NOTES:
A) NEW 25m LATTICE MAST
B) 72.43m² BASE STATION
C) 2.4m PALISADE FENCE
D) SITE SIZE: SITE SHAPED TO WALL WITH FENCE
E) BASE STATION: CHIP STONE SURFACE

DATE	DESCRIPTION	REVISION
19-07-2018	1st Issue	0
29-11-2018	Move site out of 4m servitude	1

DRAWING NUMBER: ATSA533c	SHEET: 2 OF 4
DRAWING TITLE: SITE PLAN	
DRAWN: D. LOOTS	SCALE: 1:500
DATE: 2018-11-29	REVISION: 1

ANNEXURE C 1/1

ANNEXURE D 1/1

COMMENTS FROM THE ENGINEERING SERVICES DEPARTMENT FOR: APPLICATION FOR DEPARTURE: ERF 1849, GANSBAAI (2662/2018)

Electricity	:	In order
Water	:	In order
Sewer	:	In order
Stormwater	:	In order
Roads and traffic	:	In order

Conditions:

1. that only the existing water and sewerage connections will be available to the development and that, should additional capacity be required, an investigation be conducted, with regard to the capacity required and that available, at the developer'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 developer's cost;

3. that the developer should take note that no additional connection will be supplied from the Municipal side and Electrical distribution to this structure should be handled internally;

4. that the developer must investigate and determine the limitations of the site in terms of sewer drainage, subject to the minimum requirements of SANS 140400 – P: 2010: Drainage;

5. that any additional and / or extended vehicle entrances will be for the developer's account;

6. that stormwater be allowed to discharge through Erf 1849, Gansbaai, unobstructed;

7. that no on-street parking be allowed.

p.p. R Cloete
DENNIS HENDRIKS
SENIOR MANAGER:
ENGINEERING SERVICES

01/04/2019
DATE

ANNEXURE E 1/4

OVERSTRAND MUNISIPALITEIT
31 MAY 2019
OVERSTRAND MUNICIPALITY

TP - A Theart
(S Vld merwe)

open serve

Division of Telkom SA SOC Ltd

10 Jan Smuts Drive
Pinelands
7404

FILE NO: EL 1849-GB
SCAN NO: GB 1849
COLLABORATOR NO: 1289752

Candice Spammer
Tel: 021 414 5582
Fax: 086 480 0617
Email: spammec1@telkom.co.za

Our Ref.: WWIP_WGNB1706_19
Your Ref.: 1849 GIP

31 May 2019

Attention: S Muller

Overstrand Municipality
HERMANUS

PLANT AFFECTED:

PROPOSED DEPARTURE: ERF 1849, 20 INDUSTRY CLOSE, INDUSTRIAL PARK GANSBAAI

With reference to your application received **February 2019.**

As important cables and other infrastructure are affected, please contact our representative Frederik Swart at 028 514 1199 / 081 363 7815 / FrederikS@openserve.co.za 48 hours prior to commencement of construction work.

I hereby inform you that Open Serve approves the proposed work indicated on your drawing in principle. This approval is **valid for 12 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.

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

MUNISIPALITEIT OVERSTRAND
31 MAY 2019
TOWN PLANNING
U-MASIPALA MUNICIPALITY

61 Oak Avenue, Highveld, Techno Park, Centurion 0157,
Private Bag X881, Pretoria, Gauteng, 0001

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 Open Serve infrastructure be damaged while work is undertaken, kindly contact our representative immediately.

Yours faithfully

pp

Selwyn Bowers
Operations Manager
Wayleave Management: Western Region

PLANT AFFECTED : COPPER

This wayleave, Reference Number WWIP WGNB1706 19 is valid for 12 months from date hereof and is subject to the following conditions:

1. No mechanical plant or vibrator type compactors may be used within three meters of any Openserve Plant (I.E. any Telecommuncation equipment above or below ground level).
2. The position of our plant affected by the proposal is indicated as approximate and Frederik Swart at Telephone No 081 363 7815 must be contacted at least 48 hours prior to commencement of the work, upon which the actual location of the Openserve Plant will be indicated on site.
3. A written request must be submitted to Openserve for consideration, should the of the work, upon which the actual location of Openserve Plant will be applicant require our plant to be relocated. The cost of such a relocation will be recoverable from the applicant.
4. It is the responsibility of the applicant to verify the existance of the indicated plant and to notify Openserve immediately, should the applicant locate any Openserve Plant which is not indicated on the plans.
5. Should the applicant expose any Open Serve plant, the safeguard thereof will be the applicant's full responsibilty.
6. Failing to comply with the above conditions or any special conditions addendum hereto will be regarded as gross negligence and the applicant will be held responsible for any damage or loss as a result thereof.

Date: 2019/05/31

By: C Spammer
For Regional General Manager
Western Cape

Legend	Green
1. Underground Pipe	
2. Underground Cable	
3. Manhole	
4. Street Distributio Cabinet (SDC)	
5. Jointing Pit / AJB	
6. Jointing Pillar (PJ)	
7. Pipe Junction Box (B/S)	
8. Robot Control	
9. Pole	
10. Stay	
11. Strut	
12. Aerial Cable (A/C)	

open serve

INDUSTRY STREET
SEEFEED
1851
1849
1848
1850
1722
1843
WGNB152C
WGNB152L
WGNB152K
1847
LOC
Legend
Existing Manhole
Planned Manhole
To Be Abandoned Manhole
Existing Jointing Pit
Planned Jointing Pit
To Be Abandoned Jointing Pit
Existing PJB
Planned PJB
To Be Abandoned PJB
Existing SDC
Planned SDC
To Be Recovered SDC
Existing DLC
Planned DLC
To Be Recovered DLC
Existing Pillar Joint
Planned Pillar Joint
To Be Recovered Pillar Joint
Existing Indoor DP
Planned Indoor DP
To Be Recovered DP
Existing DP
Planned DP
To Be Recovered DP
Existing Pole
Planned Pole
To Be Recovered Pole
Existing Underground Route
Planned Underground Route
To Be Abandoned Underground Route
Existing Overhead Route
Planned Overhead Route
To Be Recovered Overhead Route
Existing Mini OMDF
Planned Mini OMDF
Existing Strut and Stay
TELKOM
REGIONAL EXECUTIVE
Compiled By
G Steenmer
Client
Date
31/05/2019
Client ref
OpenServe ref
WWP_WGNB1768_18
Details
COPPER SERVICES AFFECTED
Page Size
A4
Sheet No
of
5