

*CITY OF CAPE TOWN MUNICIPAL PLANNING AMENDMENT BY-LAWS,
2019*

26 “U”, Page 12.

“‘minor freestanding base telecommunication station’ means a freestanding support structure on land.

or anchored to land and used to accommodate telecommunication infrastructure and may be attached

to street lamps, traffic lights, road directional signage, camera poles and flag poles or similar support structure; provided that –

(a) it may not exceed 12m in height measured from existing ground level or road surface or pavement

as the case may be or a diameter of 300mm for the post or support structure to which the antenna is to be attached;

(b) a screened container for antennas which must be part of the post or support structure may not exceed a vertical dimension of 2m, or diameter of 500mm; and

(c) an equipment container may not exceed 1m x 1m x 1m cube above existing ground level

13 (v) the insertion after the definition of ‘mine’ (comment by EMFSA: should this be MINOR?) of the following definition: “‘minor rooftop base telecommunication station’ means a concealed support structure integrated with the roof, side or any other part of a building and used to accommodate telecommunication infrastructure, which does not exceed a vertical dimension of 1,5m”

EMFSA Comment - Private Land - the old and new Single Residential Zoning states that occupation [double storey] is allowed up to 11m in height.

EMFSA General Interpretation.

In suburban areas, single residential - “Minor” rooftop T.I. installations without consent and public participation.

Pole mounted small cell antennae on municipal land but may not exceed 12m in height [note that properties may be occupied up to 11m height, two storeys and an attic room].

The antennae on the pole must not extend beyond the 12m height of the pole. Therefore the antenna enclosure is 10m high at the base and 12m high at the top.

It stands to reason then that an antenna placed in the lower half of the enclosure could possibly be operating at a height of between 10 and 11 metres, lower than the inhabitable height of the house.

So assuming no changes have been made to the City’s Telecommunications Infrastructure Policy, the pole mounted additions to the Zoning Scheme conflicts with OB.10.3 of that Policy unless these proposed poles are mounted more than 50m away from single residential structures.

However the 50m exclusion zone is overridden by A2.4 of the Telecommunication Infrastructure Policy which states that any structure within the 50m distance from the tower requires additional measurements to ensure compliance with ICNIRP. It is our opinion that such poles do fall under A2.4 of the T.I. Policy and therefore would require regular monitoring

It is therefore the responsibility of the City to ensure that when additional antennas are attached to a pole the following happens: The antennas should be placed on the City's records and for each additional antenna new measurements should be taken by the City **and** an independent organisation. These measurements should also include power density measurements, not only ICNIRP percentages.

