

Challenges With the Land Use Applications Process in South Africa

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ABSTRACT

Effective land management is a panacea for the development of every nation, as land is needed for any infrastructure development. The South African government introduced the SPLUMA (Act 16 of 2013) land-use management policy to improve the land-acquisition process. This study aimed to explore the challenges encountered in processing land-use applications within Mangaung Municipality, South Africa. A qualitative research approach was adopted, using Bloemfontein as a case study. A semi-structured interview was conducted with 25 town planners, engineers, and environmentalists in Mangaung who were involved in land management processes to collect primary data. The factors contributing to the municipality's inability to process applications on time were categorised into external (client-related) and internal (human capacity-related, work process-related, and technology-related). The delay in land-use applications is widespread in the municipality, necessitating an urgent solution. The delay may affect the property development process, negatively impacting the municipality's and the country's economic development. Therefore, the administrative management of land applications in town planning must be improved to track applications more efficiently and monitor turnaround times. The study has identified the seriousness of land use application delays and their contributing factors. This will enable the municipality to reevaluate its entire land-use application process, thereby improving turnaround time and better serving its clients.

Keywords: Land use, Application, Challenges, Delays, Mangaung municipality

INTRODUCTION

Section 154 of the South African Constitution (Act 108 of 1996) defines the powers of national, provincial, and local government. Section 153 of the South African Constitution (Act 108 of 1996) states that.

“A municipality must structure and manage its administration and budgeting and planning processes to give priority to the basic needs of the community and to promote the social and economic development of the community, and section 154 states that: The national and provincial government by legislative and other measures must support and strengthen the capacity of municipalities to manage their affairs to exercise their powers and to perform their functions”.

Although the South African Constitution was clear about municipalities' authority in land-use planning, the provinces still perform this role. Before the Constitution of 1996 (Act 108 of 1996), provincial legislation governed land use planning decisions, among other things, the Provincial Ordinances of 15 of 1986, Land Use and Planning Ordinance 15 of 1985, the Orange Free State's Ordinance 9 of 1969 and the Natal Town Planning Ordinance 27 of 1949. The Development Facilitation Act 67 of 1995 (DFA) was enacted after 1994. It was found that the process of approving land use applications was prolonged under the Ordinances (Dlamini and Musakwa, 2014). Therefore, the DFA was enacted to facilitate and speed up planning and development processes (Maleham, 2018).

According to Nel (2015), land use applications were conducted in accordance with the DFA principles; however, the DFA was never utilised for development applications or in the establishment of a development tribunal in the Free State. When the DFA was enacted, the Ordinances were never repealed. Nel (2015) further stated that the Free State Land Development Objectives Regulations were gazetted on 14 November 1997. However, the Land Development Objectives regulations were never repealed but rather superseded by the Integrated Development Plans (IDPs) and Spatial Development Frameworks in the Free State, as prescribed by the Municipal Systems Act (Act 32 of 2000). The Constitutional Court declared the unconstitutionality of Chapters 5 and 6 of the DFA as of June 2010, because development tribunals established under the DFA are unable to decide on municipal planning matters (Dlamini and Musakwa, 2014). According to Dlamini (2014), the Constitutional Court judgment came as a surprise because the DFA had been performing very well in speeding up development in South Africa.

Appeals against land-use applications can now be lodged with municipalities. The law's focus area is devolving planning powers to local government. The perception was that the provincial government takes too long to decide on land use applications. Now that authority lies with the local government, the need arises to determine whether the challenge of time delays in land-use application processing has been sufficiently addressed since the implementation of SPLUMA (Visser and Poswa, 2019). If there are challenges, it is best to have a better understanding of them. Understanding the factors contributing to delays in land use application processing is also essential. Visser and Poswa (2019) observed that the development of larger infrastructure projects is more likely to require the developer to secure various approvals from different state departments before commencing development. The biggest challenge in processing land use applications is what Visser and Poswa (2019) observed: "excessive bureaucracy and red tape surrounding development is indeed a serious impediment to development". The fact is that a development or property investment idea only becomes realistic or legal after land use planning approval.

Section 40(9) of SPLUMA prescribes the timeframe within which the development tribunal must decide on a land development application. Section 44(1) prescribes the timeframes for the Land Use Management Bylaw that MPTs must adhere to in decision-making. However, according to Visser and Poswa (2019), the shortening of land-use development processes can only

be addressed through the Land Use Management Bylaw of the respective municipalities. This would require constant monitoring of the approval timelines and trend analysis. According to Nel (2015), there must be timeframes for all departmental comments that inform land-use applications. This should include national and provincial departments. Amler (1999) states, “It is difficult to avoid friction and conflicts in land use planning”. Therefore, an improved planning system should be an incremental process. Thus, due to the complexities in the processes, transversal management should be central to the operationalisation of the discourse. To propose effective interventions, it is essential to understand the constraints and obstacles that participants in the development process face. The study thus aimed to identify the challenges encountered in processing land-use applications in Bloemfontein.

LITERATURE REVIEW

Land Use Application Process

Land-use applications and property development are interrelated and should be viewed holistically. Property development is usually very capital-intensive and requires careful planning to produce a product that will sell in the market. Millington (2000:1) said, “Property development takes place to satisfy a demand in the local property market”. This would, therefore, necessitate a financial viability study of the development at the planning stage (Millington, 2000). As part of the financial planning process, land use planning approvals influence the feasibility of development at various stages of approval, when infrastructural requirements are determined and set out as conditions for the land development approvals granted. Approval conditions and infrastructure requirements will ultimately influence the market price of a serviced site (De Visser and Poswa, 2018).

According to Smersh (2003), issues such as fees, higher standards, background studies, and approval delays often increase the development cost. It is assumed that when the developer submits their application to the municipality, there will be a market demand for the product (Millington, 2000). The challenge is that it is unclear whether the various actors are familiar with the property market and its cycles. It is further stated that effective demand can only be validated if the buying power is validated. Therefore, it is senseless to develop a product that is unaffordable in the property market. For example, the construction of an expensive road or reservoir may negatively affect development. Millington (2000) states, “Very early in the development process, market research is essential to determine property demand in the municipality”. This addresses the “Effective power” question of market participation. It is unclear at this stage how developers determine property demand before embarking on a development project. Municipal officials ignore the property demand aspect because it is not required in the land-use application process. However, the municipality’s interest will undoubtedly be expanding the tax base, leading to the city’s sustainable growth (Millington, 2000).

SPLUMA requires that all land development be submitted to the municipality as an authority. A municipality must, at a minimum, determine the following aspects of the land development application process.

- a) The method that must be used to submit the land development and land use application.
- b) Applicable timeframes for various phases, as outlined in the regulation
- c) The required participation level.
- d) The extent of intergovernmental participation in the land development application

According to SPLUMA Regulations, section 16 distinguishes between the administrative, consideration, and decision phases. Section 16(3) states that the administrative phase begins after the submission of a complete land development application to the municipality. According to section 16 (4), the consideration phase may not exceed 3 months, and section (5) states that the decision on land use application must be made within 30 days of the MPT's last sitting. Planning consent is essential in the property development process.

Land-Use Application Constraints

A typical challenge in property development is that time limits are attached to land development approvals. The Land Use Management Bylaws provide extensions, as per Section 73, to address the challenges posed by lapsing development planning approvals. Cadman (1991) categorised the development process according to the different actors involved. The actors involved are statutory bodies, landowners, financial Institutions, developers, professional advisors, building contractors and objectors. Professional advisors are economic consultants, planning consultants, tax consultants, estate agents, architects, valuers, builders, engineers, quantity surveyors and occupiers. Dankani (2010) argued that, despite numerous studies on property developers and their behaviours, there is a lack of research investigating the constraints and challenges confronting the industry and how best to address them. Dankani (2010) further postulated that an analysis is needed to examine the problems and difficulties faced by property developers. According to Nel (2015), delays in obtaining comments from departments and other government spheres primarily cause delays in processing land use applications. As stated by Smersh (2003), delays increase development costs. Furthermore, to control growth, monopoly power may be granted to some developers as other developers leave the market, while others may shift their investment to other markets. This study will confine its investigation to the Bloemfontein area because no related research has been conducted there. With the implementation of SPLUMA in June 2015, developers and investors still believe that land-use processes need to be faster and more relaxed. However, this requires further investigation through a scientific study. Shahzad et al. (2022) noted, among other things, significant constraints on land-use reviews and approvals, including lengthy application processes, delays in regulatory authorities' responses to queries, late responses to applicants' questions, and a lack of effective interaction and coordination between regulatory authorities.

RESEARCH METHODOLOGY

The Bloemfontein was used as a case study, having implemented SPLUMA since June 2015. The study aimed to provide insights into the processes followed and timelines. Case analysis can be used to investigate stakeholder interactions in land and property development processes. A case study is empirical research that investigates a contemporary issue or phenomenon in a real-life context (Cresswell, 2014). This makes the case study ideal for gaining insight into the performance of local government structures in creating an investor-friendly environment and for testing public sector and private sector participation in realising development in the city. Purposive sampling was employed in this research study. The purposive sampling method enables researchers to identify individuals with in-depth experience of the phenomenon under investigation, thereby yielding rich information (Polith and Beck, 2017). The researcher purposively identified individuals involved in land application approval processes in the Manguang municipality and interviewed them about the challenges they face in their work. Crouch and McKenzie (2006) propose a sample size of 15-20 participants, allowing the researcher to analyse individual responses critically. In this study, 15 participants involved in the land application approval processes were interviewed, and the saturation was reached at the 13th participant. However, the research included two additional interviews to confirm the saturation of the responses. Primary data was obtained through structured interviews with town planners, environmentalists and engineers working in the Manguang municipality. The interviewer asked interviewees a series of pre-established questions face-to-face, allowing them to freely express their experiences with the challenges they encountered in the land administration process. The unstructured interview is open-ended, tailoring the situation to make the interviewee feel relaxed and to encourage them to express their opinions, if the interviewers do not know all the necessary answers (Cresswell, 2014). The interview was conducted at the participants' offices and recorded using the researcher's cell phone. Each interview lasted approximately 25 to 35 minutes. The thematic data analysis was to analyse the qualitative data collected. The researcher adopted Creswell's (2014) 4-step qualitative thematic data analysis.

- **Step 1: Getting Familiar with the Data:** They read the data gathered several times to identify the information provided and common themes. During this process, the researcher assigned codes to the participants, such as P1-P6 for Town Planners, P7-P8 for Civil Engineers, and so on, to conceal their identities, as shown in Table 1.
- **Step 2: Categorising the Data:** The researcher codes the data into themes and categories to answer the main research questions. The identified themes from the data were tabulated for each participant, categorised by profession. See Table 4
- **Step 3: Searching for Themes:** the researcher then identified main themes from the several themes and grouped the themes under main themes such as Client-related, Human capacity-related, etc. (see Table 3).

- **Step 4: Interpreting the meaning of themes:** Data were then transformed into a meaningful group of findings and discussed accordingly, citing participants' narrations as examples.

The demographic data of the interviewees are presented in Table 1, where 40% are town planners, 47% are engineers, and 13% are environmentalists. Most participants (53%) have master's degrees, indicating in-depth knowledge in the subject area. Likewise, 67% have over 10 years of experience in their profession and dealing with land approval matters. This also enriches participants' views, as they have extensive experience with the challenges faced in their departments' land approval processes. All participants are workers from the Manguang municipality who handle application approvals.

Table 1: Participants' demographic data.

Participants	Departments	Profession	Qualifications	Experience
P1	Town Planning	Town Planner	Bachelor's degree	18 Years
P2	Town Planning	Town Planner	Bachelor's degree	15 Years
P3	Town Planning	Town Planner	Master's Degree	9 years
P4	Town Planning	Town Planner	Master's degree	5 years
P5	Town Planning	Town Planner	Bachelor's degree	29 years
P6	Town Planning	Town Planner	Master's Degree	7 years
P7	Town Planning	Civil Engineer	National Diploma	12 Years
P8	Town Planning	Civil Engineer	BTech Degree	22 Years
P9	Transport	Transport Engineer	Master's Degree	26 Years
P10	Transport	Transport Engineer	Master's Degree	20 years
P11	Transport	Transport Engineer	Master's Degree	24 years
P12	Transport	Transport Engineer	Master's Degree	10 Years
P13	Environmental Affairs	Environmentalist	Honours Degree	14 years
P14	Environmental Affairs	Environmentalist	Master's Degree	6 years
P15	Centlec	Electrical Engineering	Honours Degree	11 years

FINDINGS

Challenges With the Land Use Application Processing

Based on the information revealed through the document analysis, interviewees were asked to narrate their challenges in processing, drawing on their experiences over the years. The responses were then analysed to identify the common themes per department, as indicated in Table 3. This was done to determine whether there are differences in challenges across the various departments involved in land-use application processing. The challenges were therefore categorised into external (client-related) and internal (human capacity-related, work process-related, and technology-related), as indicated in Table 2.

Table 2: Categories of the challenges.

Sources	Categories	Challenges
External	Clients related	Misleading information in reports
		Poor quality of submitted reports
		Delay in submitting the requested additional information
		Return of incorrect applications
		Insufficient information in submissions
		Insufficient/incorrect additional information submitted
		Inaccurate information submitted
		Non-adherence to municipal guidelines
	Human capacity-related	Inexperienced Environmental Consultants
		Lack of human resource capacity
		Lack of experience
		Workload, leading to a delay
		Delay in getting comments from Transport Planning
		Delay in advertising
Internal	Work process-related	Omissions in advertising on the site and registered mail to the surrounding property owners
		Investigations and site inspections are time-consuming
		Challenges with underground services identification.
		Poor standards and a lack of internal quality control
		Submissions are getting lost in the administration system
	Technology related	Time delays between the submission date and the date comments are requested.
		Lack of electronic systems

DISCUSSION OF THE FINDINGS

Challenges Confronting the Municipality in the Land Use Application Process

Internal Challenges

In the Mangaung Municipality, the preparation stage includes the pre-consultation stages prescribed by Section 40 of the Mangaung Land Use Management Bylaw, followed by comments from Transport Planning and an Environmental Impact Assessment, as applicable. Section 41 of the Land Use Management Bylaw stipulates the information required for a land use application. As part of the preparation stages, roads, stormwater reports, and water and sanitation reports should be included in the engineering reports. Centric assesses both electrical and engineering reports. The findings showed that the preparation stages take an incredibly long time. This investigation revealed that human resource capacity is a problem for these units. The only

engineer in the roads and stormwater department was overwhelmed by numerous responsibilities, leaving him unable to manage all administrative duties effectively. P9, P11, and P14 emphasised these situations.

P9: *“Human Resource constraints, insufficient qualified officials to evaluate applications “*

P11: *“There is a general human resource capacity problem in the sub- directorate”*

The National Planning Commission (2011) indicated that many municipalities’ lack of technical staff has adversely affected land management systems. In support of this assertion, Oranje (2014) suggested that young planning professionals prefer working in high-paying metropolitan areas, leaving many smaller municipalities to struggle with the required professionals. Berrisford (2011) therefore advised municipalities to address human capacity issues before implementing SPLUMA. The findings of this study align with the propositions proposed by the National Planning Commission and Berrisford.

It was found that, in some cases, the advertisement was delayed by 8 to 9 months, thereby contributing to delays in processing land-use applications. According to the Mangaung Land Use Management Bylaw (2021), Section 47(e), an application must be advertised within 28 days after notification that the application is complete. For instance, P1 and P2 stated that omissions in on-site advertising and in registered mail to surrounding property owners were a cause of the delay.

P1: *“The advertising period from the consultants causes a delay due to the grouping of various applications before advertising”*

P6: *“Non – compliance with legislated timeframes causes a delay in processing of land use applications”*

Smersh (2003) stated that various factors increase land development costs, including fees, background checks, higher standards, and time delays in the land-use planning process. Higher standards become relevant in the assessment of Transport Planning reports. According to Nel (2015), delays in obtaining comments from departments and other government spheres primarily cause delays in processing land use applications. This study found that the delay is not only due to the time spent obtaining comments but also apparent during the consideration phase, as applications at Mangaung are often submitted with comments.

P3: *“Delay in getting comments from Transport Planning”*

P12: *“There is a time delays between the submission date and the date comments are provided”*

According to Nel (2015), one of the major issues delaying land-use application processes is the government department’s inability to provide timely feedback to applicants. This situation prevents applicants from responding promptly to information requests, compounding delays in the application process. Malham (2018) observed that land-use application

processes are becoming too slow, leading the private sector to lose faith in the system. Through the transmittal methods, it was found that applications are also submitted by hand delivery, which contributes to the delay. This enables the implementation of electronic transmittal methods to enhance efficiency. P1 and P7 identified electronic systems as a contributing factor to the delay.

P1: "Electronic systems were not well supported by internal staff."

P7: "Lack of electronic systems that are technologically advanced as process tools"

According to Lewis (2008), there is a stronger drive towards using new technologies. In the case of Centlec, it was stated that Microsoft Planner can be used to send reminders to officials about the due date for report submissions; however, this has not been implemented. This can be attributed to the unit's lack of administrative support.

External Challenges

The external challenges causing delays in processing land use applications are attributed to the client's behaviour. Some clients do not submit a complete application. When asked to submit the remaining documents, they often delay, further delaying processing. It was identified that the applicant's submission contains inconsistencies which need further clarification from the applicant. The applicants often fail to respond to the invitation to the municipality's office to clarify these inconsistencies, resulting in additional delays.

P9: "Long response time from applicants professional team following request for additional information"

P11: "Inconsistency with reports format and incomplete submissions which require further information to be submitted"

Again, the findings showed that most clients follow the submission requirements. As such, they submit a substandard report that does not meet the threshold, prompting the applicant to submit correct documentation. Most clients delay submitting the requested document or fail to respond to the request on time and then blame the officials for not processing the application in a timely manner.

P2: "Some applications are of poor quality, often requiring multiple submissions"

P3: "Poor quality of reports in knowing and understand Town Planning processes"

Patel et al. (2007) suggest that Land use management systems are complex. Thus, the professionals involved must acknowledge the need to involve customers and cooperate with them to avoid delays in the process. Schwilch et al. (2012) suggest that stakeholder collaboration is vital for effective land management; however, their limited understanding of the processes often poses a challenge. It is therefore not surprising that the client's lack of

understanding of the required documents for submission has contributed to the delay, as the land use approval officials must request that the missing or incorrect documents be resubmitted. Reyman (2024) cited poorly written documents, the lack of procedures, and bureaucracy as significant factors in land-use approval delays. Shahzad et al. (2022) also agreed that applicants' late responses to questions contribute to the delay.

Implication of the Findings

It was found that the municipality introduced an electronic system (ORBIT), but only the Transport Planning department used it diligently. However, the ORBIT system is not well-received by the Town Planning Units. It was found that, regardless of the use of the ORBIT system, a backlog persisted in Transport Planning, and the Town Planners' performance in processing land use applications did not improve. The Department also introduced a compliance check system before candidates apply for the Traffic Engineer position. The Department also draft responses and emails them to the applicants. Additionally, the applicant was invited to discuss issues related to their applications. Due to the discipline's complexity, the optimum capacity in transport planning is essential for a team to do compliance checks on applications before submitting them to traffic engineers. Coordination between the spheres of government is critical because planning across the various road authorities must be integrated.

CONCLUSION AND RECOMMENDATIONS

The study revealed that capacity issues in various departments have a significant impact on their performance. The study revealed that certain departments, such as Roads and Stormwater and Transport Planning, require additional capacity. The study also revealed that EIA processes are excessively lengthy and that the legislated timeframes need to be reviewed. The investigation found that the Land Use Management Bylaw should provide a prescribed legislative timeframe for public participation following the submission of applications.

The administrative management of applications in town planning must be improved to track applications more efficiently and monitor turnaround times. This can be achieved by establishing a statistics control unit within the Municipality's Planning Department and Engineering Departments to monitor land use application timelines. A capacity analysis in the municipality should ensure the optimal functioning of all departments that contribute to the effectiveness of the land-use management system. The transport planning department should also have an engineer to assist with compliance checks of all applications. It is recommended that peer learning sessions be introduced annually, allowing some departments to learn from one another on how to improve turnaround times. It is also recommended that the Land Use Management Bylaw should provide legislated timelines for comments from sector departments. There should be better coordination between tertiary institutions and the three spheres of government to train transport engineers

and other professionals. Government departments should also introduce incentives to retain scarce skills within the transport planning sector. Future studies can investigate the management of service-level agreements and their contribution to the municipality's integrated infrastructure planning.

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