



TDA
CAPE TOWN

The City of Cape Town's Transport
and Urban Development Authority

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EnviroAfrica CC,
P. O. Box 5367
Helderberg
7135

Attention: Mr. Emile Esquire [via e-mail: emile@enviroafrica.co.za]

Dear Sir

ERF 73, KLIPHEUWEL: PROPOSED DEVELOPMENT OF A 25M HIGH TELECOMMUNICATIONS MAST AND BASE STATION APPLICATION – PRE-APPLICATION BASIC ASSESSMENT REPORT

The abovementioned Report, dated September 2018, refers. The following technical comment is provided:

1. CITY HEALTH: Environmental Health Department

- 1.1 The base station infrastructure (or any future combination of such infrastructures) shall not at any time cause the public to be exposed to RF levels that exceed the ICNIRP public exposure guideline.
- 1.2 The projected RF exposure levels within the area to which the public has reasonable access to, must be determined and certified by a qualified person and supplied to Council's Director Health Services, prior to the erection of the cell mast infrastructure. Such qualified person must provide a certified statement that the projected RF exposure levels are within the ICNIRP public exposure guidelines.
- 1.3 Appropriate steps must be taken by the applicant, to the satisfaction of Council, to ensure that:
 - 1.3.1 The public exclusion zone is determined by a qualified person and forwarded to Council prior to the erection of the infrastructure. Such exclusion zone must thereafter be adequately sign posted with the appropriate health warning signs in accordance with international best practice.
 - 1.3.2 Access control measures must be implemented to ensure that unauthorized persons do not gain access to the public exclusion zone.
- 1.4 Regular measurements are taken to ensure that the cell base station and related infrastructure meet the ICNIRP public exposure guidelines. Such measurements are to be at the cost of the applicant and made available to the Executive Director Health Services.
- 1.5 In the event of such measurements showing that the ICNIRP public exposure guidelines are being exceeded, Council reserves the right to withdraw the LUPO and NBR permission and

cause the cellular telecommunication infrastructure to be decommissioned at the cost of the applicant.

- 1.6 Health standards are to be reviewed periodically based on ongoing scientific research, the applicant will be required to decommission (including site rehabilitation) or upgrade any communication structure that does not meet the most recently published health standards of the World Health Organisation, the International Committee on Non-Ionising Radiation Protection (which have been adopted by the National Department of Health) and the Independent Communication Authority of South Africa.
- 1.7 Should the Health Department determine that the current limits of the electromagnetic radiation pose a significant health risk, decommissioning shall be required and the site be rehabilitated to the satisfaction of this Department.
- 1.8 The City of Cape Town Cellular Telecommunication Infrastructure Policy is to be complied with.
- 1.9 Numerical simulations of predicted RF EME levels must be submitted to City Health's Senior Mechanical Engineer, for verification and assessment, prior to approval of the site. This Department may request further information or verification from the applicant, which may include numerical simulations of predicted RF EME levels done by an independent certified institution. These readings must be submitted with reference to compliance with the latest public exposure limits, i.e. what percentage it is of the ICNIRP guidelines.

2. SPECIALISED ENVIRONMENTAL HEALTH: Mechanical Engineering - Noise Division

- 2.1 All antenna and ancillary on the mast are to be clearly indicated on the plans, including the exact position of each antenna and ancillary. This must be done for the short term, medium term, and long term planning. Any deviations from this plan needs to be cleared with the City of Cape Town prior to any installations/augmentations have been made.
- 2.2 The tilt angle of each transponder is to be provided.
- 2.3 The distance in metres from the bottom tip of the lowest transponder to the final ground level is to be provided.
- 2.4 At the 50m public exclusion zone band of 5m, the height safety factor above the head level of a man that is 2m in length or walking in that area at that range is to be depicted graphically.
- 2.5 All geometric sketches including all angles and distances to scale are to be provided.
- 2.6 It is questioned if any stand-by generators will be installed. If so, what noise mitigating measures will be put in place.
- 2.7 No aviation lights are indicated on the plans. Two aviation lights are to be installed on the proposed mast and indicated on the plans.

3. TRANSPORT DEVELOPMENT AUTHORITY (TDA): Development Management Department

- 3.1 The submission and approval of a consent use application to permit the freestanding base telecommunication station is required once the necessary Record of Decisions have been received from the competent authorities, Heritage Western Cape and Department of Environmental Affairs and Development Planning.

4. TRANSPORT DEVELOPMENT AUTHORITY (TDA): Environmental Management Department

Pre-App BAR

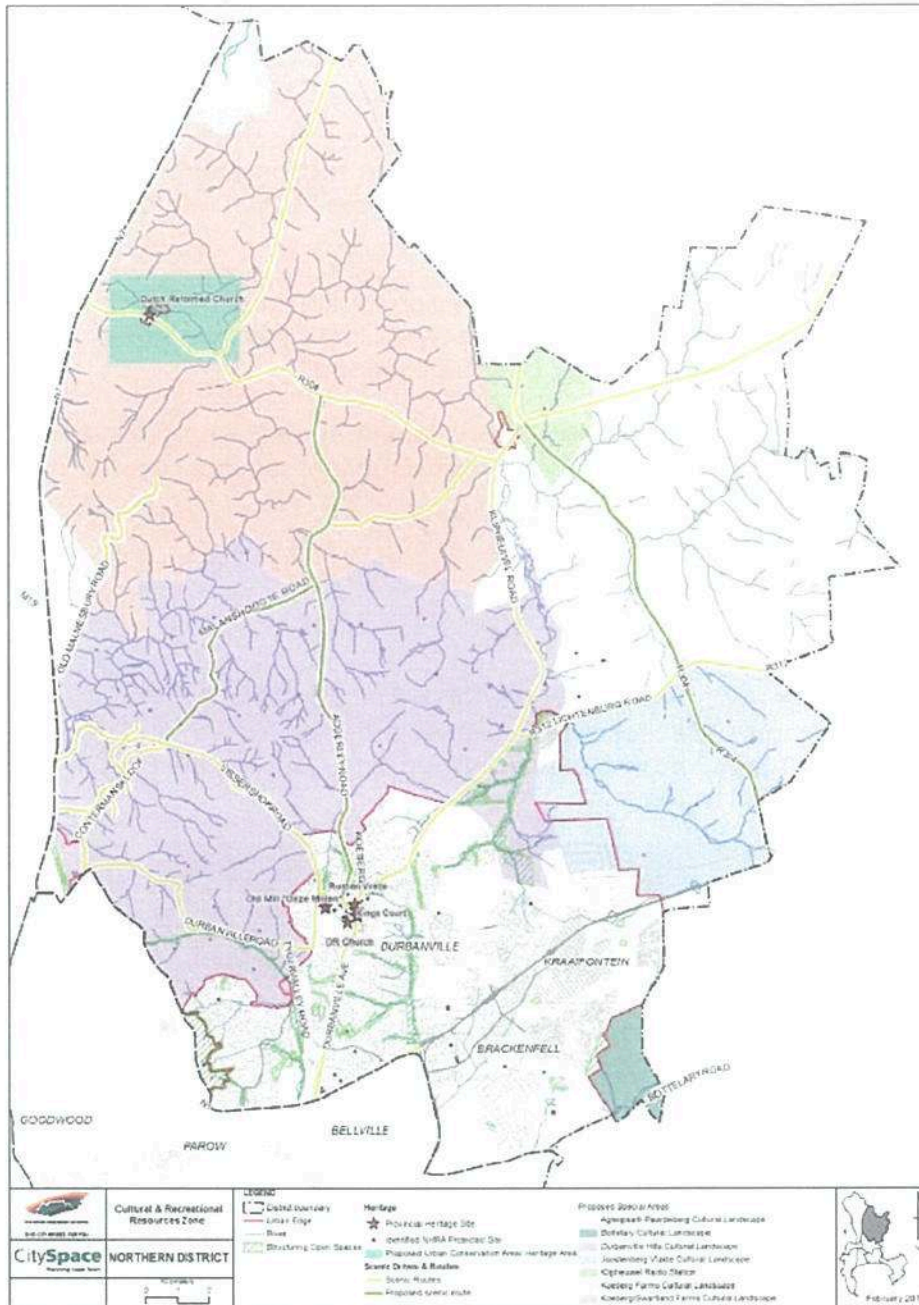
- 4.1 Page 6 of the Pre-App BAR under the Site Description section it erroneously states that the proposed 25m high telecommunication mast and base station will be located on Erf 72 Klipheuwel. This must be corrected.
- 4.2 Page 7 of the Pre-App BAR under the Site Description section indicates the mast proposed will be a tree mast. The report does not indicate the type of tree this mast design will be e.g. palm tree, Norfolk pine, etc. This disguised type must be provided.
- 4.3 The EMP is not supported in its current format. Many inconsistencies and information not pertaining to the subject erf is evident. The following sections requires amendment:
 - 4.3.1 Project description
 - 4.3.2 Access
 - 4.3.3 Receiving environment

Heritage

- 4.4 The NID submission and HWC response to the NID submission is noted. The NID submission, the HWC response letter and the heritage screener refers to Erf 72 and the application is applicable to Erf 73. The EAP must please follow up and confirm with HWC if a revised letter from them is required in this regard.



- 4.5 It is noted that the heritage screener document focusses mostly on heritage resources related to archaeology. The NID submission did not reflect the site in relation to the Agter Paarl/Paardeberg cultural landscape, Klipheuwel Radio Station or the Koeberg/Swartland Farms Cultural Landscape within the larger landscape.



CONCLUSION

The above comments and requirements raised by the City of Cape Town are to be addressed in the Draft Basic Assessment Report.

Yours faithfully

PAT TITMUSS

Regional Manager: Environmental & Heritage Management – Northern Region