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EnviroAfrica  
P.O. Box 5367  
Helderberg  
7135

By email: [emile@enviroafrica.co.za](mailto:emile@enviroafrica.co.za) / [Bernard@enviroafrica.co.za](mailto:Bernard@enviroafrica.co.za)

Attention: Inge Erasmus / Bernard de Witt

**PER-APPLICATION BASIC ASSESSMENT REPORT: PROPOSED DEVELOPMENT OF A 30M HIGH TELECOMMUNICATION TREE MAST, REMAINING EXTENT ERF 5094, FIRLANDS (BROADLANS), STRAND (DEADP REF. NO: 16/3/3/6/7/1/A3/57/2136/18)**

Reference is made to the Pre-Application Basic Assessment Report (BAR) for the proposed development of a 30m high telecommunication tree mast on the abovementioned property. This application has been assessed in terms of the National Environmental Management Act, no 107 of 1998.

The Environmental Management Department (EMD): Environmental and Heritage Management (E&HM) Branch circulated the Pre-application BAR to the following departments/branches for comment:

Informal Settlements, Water & Waste Services Directorate:

Catchment and Stormwater Management Branch; Solid Waste Management Department

Directorate of the Mayor:

Enterprise and Investment Department

Social Services Directorate:

Environmental Health

Transport and Urban Development Authority (TDA):

Asset Management and Maintenance Branch; Urban Planning and Mechanisms Branch; Development Management Branch

Comments were received from the following departments/branches:

**EMD: Environmental and Heritage Management Branch - Heritage Section: Elize Mendelsohn**

Contrary to the assumption made in the pre-application BAR, this Branch is of the opinion that the proposed construction of a 30m freestanding telecommunications tower, within the mostly vacant rural landscape, will trigger the following activities identified in section 38 of the National Heritage Resources Act, Act 25 of 1999:

- Section 38(1)(c) any development or other activity which will change the character of the site-
  - (1) exceeding 5 000m<sup>2</sup> in extent;

The proposed location, as indicated, is away from any buildings and structures that might mitigate the impact and will be visible against the mountain backdrop. However, despite the applicant's contention that a Notice of Intent to Develop (NID) would not be applicable, such an application has been made to Heritage Western Cape (HWC). HWC responded, in their final comment, dated 20 August 2018, that since there is no reason to believe that the construction of the **25m** telecommunication mast would impact on any heritage resources, no further studies under Section 38 were required.

However, since the application is for a 30 m high tree mast, the applicant will have to apply for an amendment to the RoD (not a new application) to the revised height before the Heritage Section of the Environment and Heritage Management Branch will be able to support the application. Alternatively, the applicant can amend the application to include a reduction in the height of the mast to 25m instead of 30m.

**EMD: Environmental and Heritage Management Branch - Environmental Section: Lauren King**

This Branch has reviewed the Pre-application BAR and is satisfied that all environmental concerns have been addressed.

It should be noted that the proposed mast will be located in a rural area with a relatively flat topography and very low density. No high buildings and/or structures are located in close proximity to the proposed mast, which will also be very closely situated to the approximately 100m wide Sir Lowry's Pass River corridor. While this Branch is not opposed to the development of a telecommunication tree mast on the abovementioned property, the preferred alternative (30m high tree mast) is not deemed desirable in its current form. This Branch is of the opinion that a reduction in the height of the mast to 25m instead of 30m will be better suited for the site, in order to mitigate the visual impact of the mast, albeit a tree mast, on the cultural landscape.

Notwithstanding the above, having reviewed the Environmental Management Programme (EMPr), the following corrections are required:

- Page 4: The title in bold at the top of this page refers to a 25m height and incorrect site details. This must be corrected.
- Page 4, Site location: The first paragraph under this section refers to an incorrect mast height and design, as well as site location. This must be corrected.
- Page 4, Site location: The last paragraph on this page speaks to a different site. This must be corrected.
- Page 5: Figure 1 at the top of this page is of the Peregrine Farm stall along the N2 and not Erf 5094, Broadlands, Strand. This must be corrected.
- Page 12, Section 13.1: The last bullet is not relevant and should be removed.

**Conclusion**

Having reviewed the application and circulated it to the relevant departments/branches for comment, the Environmental Management Department (EMD) cannot find the above proposal desirable at this stage, due to the above concerns and requirements. It is recommended that the above concerns and requirements be addressed in the final Basic Assessment Report.

Should you wish to discuss the above comments, please do not hesitate to contact Lauren King (see letterhead for contact details).

Kind regards,



Azanne van Wyk

Head: Environmental and Heritage Management Branch – Eastern Region  
Environmental Management Department

CC: Department of Environmental Affairs and Development Planning - Fax: 021 483 4372