



REFERENCE: 16/3/3/6/7/1/E4/11/1223/18

ENQUIRIES: Bernadette Osborne

DATE: 2018 -11- 23

The Board of Directors
Atlas Towers (Pty) Ltd
166 Main Road, Omnipark Building, 1st floor
PAARL
7620

Attention: Mr C Wessels

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E-mail: cwessels@Altlastowers.com

Dear Sir

COMMENT ON THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT ("BAR") IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) ("NEMA") AND THE ENVIRONMENTAL IMPACT ASSESSMENT ("EIA") REGULATIONS, 2014, FOR THE PROPOSED DEVELOPMENT OF A 25M HIGH TELECOMMUNICATION LATTICE MAST AT PERGRINE FARMSTALL ON REMAINDER OF PORTION 19 OF THE FARM NO. 319, GRABOUW.

1. The pre-application Draft BAR and letter dated 24 October 2018, as received by this Department on 25 October 2018 and this Department's acknowledgement thereof issued on 30 October 2018, refer.
2. This letter serves as comment on the aforementioned document by this Department.
3. According to the information submitted to this Department, the following is noted:
 - The proposed development of 25m high lattice telecommunication mast with a 7.4m x 4.1m base station at peregrine farmstall on remainder of portion 19 of the Farm No. 319, Grabouw.
 - The proposed development will have a development footprint of approximately 81.78m², which will be enclosed with a 2.4m high palisade fence.
 - No watercourses are present on the site or within 32m of the site.
 - No indigenous vegetation is present on the site.
 - The site is zoned for agricultural use and is located outside the urban area of Grabouw.

4. This Department's comments are as follows:
 - 4.1. Pages 6, 7, 35, 40 and 47 of the Draft BAR indicates that a Visual Impact Assessment ("VIA") will be conducted. In terms of regulatory requirements, the BAR must include a copy of specialist reports, as well as the findings, impact management measures and recommendations identified in all the relevant specialist studies. If a VIA will be undertaken it must form part of the Basic Assessment process.
 - 4.2. Pages 8, 17 and 40 refers to the construction of a 30m high mast and pages 17, 36, 37, 55 and 71 refers to different site details as to the one that is being proposed. This must be corrected in the BAR.
 - 4.3. The Environmental Management Programme ("EMPr") must include details of the following:
 - 4.3.1 The EAP who prepared the EMPr;
 - 4.3.2 The expertise of that EAP to prepare an EMPr, including a curriculum vitae; and
 - 4.3.3 A map at appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers.
 - 4.4. It was indicated in the EMPr that an environmental audit report will be submitted to the Department within six months after construction activities has been completed and after the site have been rehabilitated. Please be advised that in terms of Regulation 34(2)(d) of the NEMA EIA Regulations, 2014, the environmental audit report must be conducted and submitted to the Department at intervals indicated in the environmental authorisation.
 - 4.5. It is indicated that the power will be sourced from the landowner. Please provide written confirmation that there is sufficient capacity to accommodate the proposed development.
 - 4.6. Be advised that an original signed and dated applicant declaration is required to be submitted with the final BAR to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.
 - 4.7. In addition to the above, please ensure that original signed and dated EAP declaration is also submitted with the final BAR for decision-making.
5. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.
6. Please note that it is an offence in terms of Section 49A(1)(a) of the NEMA for a person to commence with a listed activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity. Failure to comply with the requirements of Section 24F of the NEMA will result in the matter being referred to

R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.

7. This Department reserves the right to revise or withdraw any comments or request further information from you based on any information received.

Yours faithfully



**HEAD OF COMPONENT
ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 1
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

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