

NO.	DATE	AFFILIATION	REFERENCE NUMBER	COMMENTS	RESPONSE	RESPONDENT
Comments on Pre-Application Public Participation an NOI						
1.	2018-07-23	DEADP Bernadette Osborne	16/3/3/6/7/1/E4/11/1223/18	<p>Acknowledgement of NOI Appendix F1.1</p> <ol style="list-style-type: none"> 1. Your document and letter dated 12 July 2017, as received by the Department on the same day refer. 2. This letter serves as acknowledgment of receipt of the aforementioned document. 3. The Department notes your request for a pre-application meeting, the meeting date will be confirmed with the EAP. 4. The Department will provide a comment subsequent to the meeting. 5. The Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received. 	<ol style="list-style-type: none"> 1. Noted 2. Noted 3. It was decided that the process should go ahead without a meeting being held. 4. It is requested that DEADP please give comments on the Pre-App BAR for comment Oct 2018 (this report). 5. Noted 	
2	2018-07-28	Cape Nature Chanel Rampartab	SSD14/2/5/1/7/4/319-19_Grabouw	<p>Appendix F1.2</p> <ol style="list-style-type: none"> 1. CapeNature would like to thank you for the opportunity to 	<ol style="list-style-type: none"> 1. Noted 	

				<p>comment on the application for a 25 m high telecommunications mast on FA 319/19, Peregrine Farm Stall, Grabouw. These comments only pertain to biodiversity-related impacts and not to the overall desirability.</p> <ol style="list-style-type: none"> 2. CapeNature’s previous comments to the Theewaterskloof Municipality dated 18 December 2017 remain valid. 3. CapeNature would like to receive the full reports related to this application for comment. 4. CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received. 	<ol style="list-style-type: none"> 2. Noted refer to Appendix F1.2.1 3. Noted. Cape Nature will be given the opportunity to comment on the Pre-App BAR for comment Oct 2018 (this report). 4. Noted. 	
2.1	2017-12-18	Cape Nature Chanel Rampertab	SSD14/2/6/1/7/4/319-19_dep&cons_Grabouw	<p>Appendix F2.1.2 Application for departure and consent use for freestanding cellular communications base station: Portion 19 of the farm Palmiet River no. 319, Grabouw</p> <ol style="list-style-type: none"> 1. CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our 	<ol style="list-style-type: none"> 1. Noted. 	EnviroAfrica

				<p>comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.</p> <p>2. The application is for consent use and permanent departure to permit a freestanding cellular communications base station.</p> <p>3. The site is classified as No Natural on the Western Cape Biodiversity Spatial Plan. The vegetation that would have originally occurred on site is critically endangered Elgin Shale Fynbos, however there are no natural areas remaining.</p> <p>4. Given the low biodiversity impact of the proposed development, CapeNature does not object to the application.</p> <p>5. CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p>2. Please note that this is a new application for an Environmental Authorisation.</p> <p>3. Noted</p> <p>4. Noted</p> <p>5. Noted. Cape Nature will be given the opportunity to comment on the Pre-App BAR for comment Oct 2018 (this report).</p>	
3	2018-09-06	HWC Stephanie- Anne Barnardt	HM/ CAPEWINELANDS/ THEEWATERSKLOOF? CALEDON/ FARM 319/19	<p>App F1.3/ App E1</p> <p>1. You are hereby notified that, since there is no reason to</p>	1. Noted	EnviroAfrica

				<p>believe that the proposed construction of a 25m telecommunications mast, will not impact on heritage resources, no further studies under Section 38 of NHRA Act 25 of 1999 is required.</p> <p>2. Should any herniate resources, including evidence of graves and human burials, archeologically material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately and HWC must be notified.</p> <p>3. This letter does not exonerate the applicant from obtaining any necessary approval from any other applicable statutory authority.</p>	<p>2. Noted and agreed.</p> <p>3. Noted and agreed.</p>	
4	2018-10-23	DEADP Bernadette Osborne	16/3/3/6/7/1/E4/5/1408/17	<p>Appendix F1.4</p> <p>1.The NOI dated 20 Nov 2017 as received by the Department on 27 Nov refers</p> <p>2. Please note that this pre-application file has been closed and replaced with a new NOI lodged with the Department reference 16/3/3/6/7/1/E4/11/1223/18</p> <p>3. This department reserves the right to revise or withdraw initial comments or request further information from you based on any information received.</p>	Noted	
COMMENTS ON PRE-APP BAR OCT 2018						

5	2018-10-30	DEADP Bernadette Osborne	16/3/3/6/7/1/E4/11/1223/18	<p>Acknowledgement of Pre-App BAR Appendix F1.5</p> <ol style="list-style-type: none"> 1. The pre-App Draft BAR and letter dated 24 October 2018, as received by the department on 25 October 2018, refer 2. This letter serves as acknowledgment of receipt of the aforementioned doc 3. Please note that this Dept will consider the Pre-App DBAR and issue a comment within the prescribed 30day commenting period which end on 26 Nov 2018. 4. Kindly quote the above-mentioned refence 5. Please note that the activity may not commence prior to an EA 6. This department reserves the right to revise or withdraw initial comments or request further information from you based on any information received. 	Noted.	
6	2018-11-19	Overberg District Municipality	18/5/5/4	<p>Appendix F1.7</p> <ol style="list-style-type: none"> 1. It is noted that the proposed development is situated within a development area and would therefore have no impact on any critically endangered species that may occur within the Elgin Shale Fynbos ecosystem. 	1. Agreed	

				<p>2. It is acknowledged that the proposed development will be beneficial for both the social and economic sector through improved coverage.</p> <p>3. Please note that the Applicant lodged a similar application for a 30m lattice mast less than 4km away from this proposed mast (DEAD 16/3/3/6/7/1/A4/88/2134/18). Not only would a cluster of lattice masts within a close proximity of each other have a negative impact, it can also not be justified in terms of need and desirability.</p>	<p>2. Noted and agreed</p> <p>3. Please refer to the following response from Atlas Tower below. Also refer to Appendix F1.7.1 for the CoCT Telecommunication Mast Infrastructure Policy as well as the Needs & Desirability from Atlas Tower</p> <p>Atlas Tower: New technology such as LTE provide faster internet to more users which alleviates the pressure on the base station, however its range is very limited. The new LTE base stations have a maximum coverage range of +/- 500m depending on the number of users so To ensure optimal coverage, cellular towers should ideally not be more than 500m apart.</p> <p>The Cape Town Telecommunications Policy identifies the need for telecommunication support structures to be situated closer to</p>	
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				<p>4. The content of Section E of the BAR is inconsistent with the rest of the application. It proved the description of the proposed Lattice Mast at Portion 7 of Farm Jagersvlakte.</p>	<p>one another due to the increased need for smart devices. There is an increased need to provide optimal coverage in certain areas due to the increase developments created over the past decade resulting in increased signal congestion, the coverage area is thereby reduced. The area has been identified as a high congestion area in terms of coverage provisioning and the lack of existing coverage.</p> <p>With reference to the comment relating to the mast being to close to a proposed mast within 4km, As per the TMIP, issued in 2015 there are no minimal distances indicated in the policy.</p> <p>4. Thank you for pointing out this discrepancy, this was corrected.</p>	
7	2018-11-27	Cape Nature C Rampartab	SSD14/2/5/1/7/4/319-19_mast_Grabouw2	<p>App F1.8 No biodiversity impacts are foreseen provided that the EMP is adhered to. Cape Nature does not object to the application. Cape Nature would like to receive full reports related to this application for comment. Cape Nature reserves the right to revise initial comments and</p>	<p>Noted. Cape Nature will receive the Post-App BAR form comment Feb 2019.</p>	

				request further information based on any additional information that may be received.		
8	23-11-2019	DEADP Bernadette Osborne	16/3/3/6/7/1/E4/11/1223/18	<p>App F1.9 DEAP comments on Pre-App BAR</p> <ol style="list-style-type: none"> 1. The Pre-App Draft BAR and letter dated 24 October 2018, as received by this Department on 25 October 2018 and this Departments acknowledgment thereof issued on 30 Oct 2018, refer. 2. This letter serves as comment on the aforementioned document by the Department. 3. According to the information submitted to this Department, the following is noted: <ul style="list-style-type: none"> • The proposed development of a 25m high lattice mast with a 7.4m x 4.1m base station at Peregrine Farmstall on remainder of Portion 19 of Farm NO 319 Grabouw • The proposed development will have a development footprint of approx. 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. 	<ol style="list-style-type: none"> 1. Noted 2. Noted 3. <ul style="list-style-type: none"> • It was decided that the proposed height will remain at 25m Please note the base will be approx. 17.4m x 7.1 = 123,54m². • Please note the footprint is approx. 123,54m² • Agreed • Agreed 	

				<ul style="list-style-type: none"> • No indigenous vegetation is present on the site • The site is zoned for agriculture use and is located outside the urban area of Grabouw. <p>4. The Department's comments are as follows:</p> <p>4.1 Pages 6,7,35,40,47 of the Draft BAR indicated that a VIA will be conducted. In terms of regulatory requirements, the BAR must include a copy of the specialist reports, as well as the findings, impact management measures and recommendations identified in the relevant specialist studies. If a VIA will be undertaken it must form part of the BAR process.</p> <p>4.2 Pages 8, 17 and 40 refer to the construction of a 30m high mast and pages 17, 36, 37, 55 and 71 reference to different site detail as to the one that is being proposed. This must be corrected in the BAR.</p> <p>4.3 The EMPr must include the details of the following</p> <p>4.3.1 The EAP who prepared the EMPr</p>	<ul style="list-style-type: none"> • Agreed <p>4.</p> <p>4.1 A VIA was conducted and incorporated into the BAR. Please refer to the Appendix G2 for the VIA report.</p> <p>4.2 Thank you for pointing out these discrepancies, these have been corrected.</p> <p>4.3</p> <p>4.3.1 Included</p>	
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				<p>4.3.2 The expertise of that the EAP to an EPR, including the CV,</p> <p>4.3.3 A map of appropriate scale which superimposes the proposed development, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating areas that should be avoided, including buffers.</p> <p>4.4 It was indicated in the EMPr that an environmental audit report will be submitted to the Dept within 6 months after construction activities has been completed and after the site have been rehabilitated. Please be advised that the audit must be conducted and submitted to the Dept at intervals indicated in the EA.</p> <p>4.5 It is indicated that the power will be sources from the land owner. Please provide written confirmation that there is sufficient capacity to accommodate the proposed development.</p> <p>4.6 Be advised that an original signed and dated applicant</p>	<p>4.3.2 Included</p> <p>4.3.3 Included</p> <p>4.4 Noted and removed.</p> <p>4.5 Please note that electricity will be from Eskom. Please refer to a letter from Eskom Appendix E3.</p> <p>4.6 Noted. The FBAR will have the originally signed applicant declaration.</p>	
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				<p>declaration is required to be submitted within the FBAR.</p> <p>4.7 In addition to the above, please ensure that original signed and dated EAP declarations is also submitted with the FBAR for decision making.</p> <p>5. Please quote the above mentioned reference number in any future correspondence.</p> <p>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 CA has granted an EA for the undertaking of the Activity. Failure to comply with the requirements of Section 25F of the NEMA will result in the matter being referred to R10 mil or imprisonment for a period not exceeding 10 years, or both such fine and imprisonment.</p> <p>7. This department reserves the right to revise or withdraw initial comments or request further information from you based on any information received.</p>	<p>4.7 Noted</p> <p>5. Noted .</p> <p>6. Noted and agreed.</p> <p>7. Noted.</p>	
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