



**BREDE-GOURITZ**  
CATCHMENT MANAGEMENT AGENCY

101 York Street 3rd Floor Rm 302 George 6530, P.O. Box 1205 George 6530

Enquiries: R Makahane Tel: 023 346 8000 Fax: 044 873 4199 E-mail: [rmakahane@bgcma.co.za](mailto:rmakahane@bgcma.co.za)

REFERENCE: 4/10/2/K50B/ERF 3244, Hornlee

Date: 27 March 2019

EnviroAfrica CC  
PO Box 5367  
Helderberg  
7135

Att: Vivienne Thomson ([admin@enviroafrica.co.za](mailto:admin@enviroafrica.co.za))

**PROPOSED DEVELOPMENT OF A 25M HIGH TELECOMMUNICATION MAST ON ERF 3244,  
35 VIGILANCE DRIVE, HORNLEE, KNYSNA, WESTERN CAPE**

The submitted public participation notice dated 07 February 2019 refers.

The Breede Gouritz Catchment Management Agency (BGCMA) has assessed the above mentioned document and made the following comments:

- The proposed project seems not to trigger any water use based on submitted information. Should a water use be identified which may be associated with the proposed project, you will be required to apply for suitable authorisation before the project commence.

These comments shall not be construed as exempting the applicant from compliance with the provisions of any other applicable act, ordinance, regulation or by-law.

The onus remains on the registered property owner to confirm adherence to any relevant legislation with regards to the activities which might trigger and/or need authorization.

This office reserves the right to amend and revise its comments as well as to request any further information. Please do not hesitate to contact this office if you have any further queries and quote the above reference in doing so.

Yours Sincerely,

**MR JAN VAN STADEN**  
Chief Executive Officer (Acting)

**From:** Vivienne Thomson <[vivienne@enviroafrica.co.za](mailto:vivienne@enviroafrica.co.za)>  
**Sent:** Friday, 08 March 2019 9:21 AM  
**To:** 'AbrahamsN@nra.co.za' <[AbrahamsN@nra.co.za](mailto:AbrahamsN@nra.co.za)>  
**Cc:** 'Dekockr@nra.co.za' <[Dekockr@nra.co.za](mailto:Dekockr@nra.co.za)>  
**Subject:** RE.: PROPOSED DEVELOPMENT OF A 25M HIGH TELECOMMUNICATION MAST ON ERF 3244, 35 VIGILANCE DRIVE HORNLEE, KNYSNA, WC  
**Importance:** High

Dear Ms Abrahams

The proposed development site lies 172m from the N2 national road. Please could you provide comment for the above.

Thank you,  
Vivienne Thomson



**EnviroAfrica**

*Environmental Consultant*

**EnviroAfrica cc**

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a: Unit 7, Pastorie Park, Reitz St, Somerset West, 7130  
P.O. Box 5367, Helderberg, 7135

w: [www.enviroafrica.co.za](http://www.enviroafrica.co.za) e: [vivienne@enviroafrica.co.za](mailto:vivienne@enviroafrica.co.za)

Please consider the environment and only print this mail if necessary.

**From:** Nicole Abrahams (WR) <[AbrahamsN@nra.co.za](mailto:AbrahamsN@nra.co.za)>  
**Sent:** March 7, 2019 3:36 PM  
**To:** [admin@enviroafrica.co.za](mailto:admin@enviroafrica.co.za)  
**Cc:** René de Kock (WR) <[Dekockr@nra.co.za](mailto:Dekockr@nra.co.za)>  
**Subject:** PROPOSED DEVELOPMENT OF A 25M HIGH TELECOMMUNICATION MAST ON ERF 3244, 35 VIGILANCE DRIVE HORNLEE, KNYSNA, WC

Dear Sir/Madam

The above listed project bears reference.

The South African National Roads Agency received information regarding this project. Could you perhaps indicate how far the telecommunication mast is located from the nearest National road. If telecommunication mast falls within 500m radius of an intersection, SANRAL need to provide comment.

Regards

**Nicole Abrahams**  
Environmental Coordinator  
Western Region  
, Bellville, Western Cape, 7530,  
T: 021 957 4602 | M: 062 215 8945  
[AbrahamsN@nra.co.za](mailto:AbrahamsN@nra.co.za) | [www.sanral.co.za](http://www.sanral.co.za)  
Fraud Hotline Number - 0800 204 558



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## Vivienne Thomson

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**From:** Khanyisile Bonile <Khanyisile.Bonile@westerncape.gov.za>  
**Sent:** Monday, 04 March 2019 5:28 PM  
**To:** vivienne@enviroafrica.co.za  
**Subject:** Erf 3244, Knysna  
**Attachments:** Erf 3244,Knysa.pdf

Dear Applicant

Please note that your application has been approved and that your permit has been issued in terms of Section 38(1) of the National Heritage Resources Act, 1999 (Act 25 of 1999) and Regulation 3(3)(a) of PN 298 (29 August 2003).

Please find attached the record of decision, the original will be posted shortly.

Regards

**Khanyisile Bonile**

Heritage Western Cape

3<sup>rd</sup> Floor, Protea Assurance Building

Green Market Square

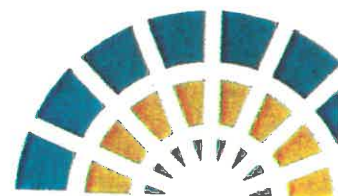
Cape Town

8001

Email: [khanyisile.bonile@westerncape.gov.za](mailto:khanyisile.bonile@westerncape.gov.za)

Telephone: 021 483 9692

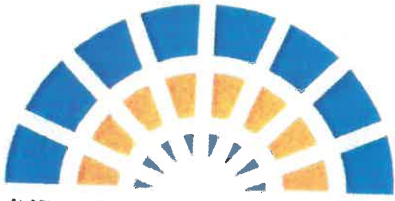
Website: <http://www.hwc.org.za>



iLifa leMveli leNtshona K  
Erfenis Wes Kaap  
Heritage Western Cape

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iLifa leMveli leNtshona Koloni  
Erfenis Wes-Kaap  
Heritage Western Cape

3860

HWC Receipt ..... 12 / 02 / 2019

For office use only

<u>APPLICANT INFORMATION:</u>		Initial the box if checked			
		1	2	3	4
Contact Person:	NICHOLAS WILSHIRE	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contact Number:	0823037870	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>SITE INFORMATION:</u>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Site address:	off Vigilance Drive Knysna	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Erf:	3244	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Case no:	19018112	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Received by:	Reagon				
<b>NOTE:</b> • No telephone calls or other queries will be accepted or responded to until 10 working days have elapsed since delivery.		Total amount paid: R330			





**REFERENCE:** 16/3/3/6/1/D4/16/0150/18  
**ENQUIRIES:** Francois Naudé  
**DATE OF ISSUE:** 2018 -09- 17

The Managing Director  
BJB Project Services cc  
58 Newton Street  
Newton Park  
**PORT ELIZABETH**  
6045

**Attention: Mr Daniel Beukes**

Tel: (041) 364 2179  
Fax: (086) 551 7130  
E-mail: daniel@bjb.co.za

Dear Sir

**RE: APPLICABILITY OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS 2014:  
PROPOSED CONSTRUCTION OF A 25 METRE TALL CELLULAR MAST AND BASE  
STATION ON ERF 3244, KNYSNA – VERENIGENDE GEREFORMEERDE KERK, KNYSNA**

1. The abovementioned checklist dated 4 September 2018 and received by the Directorate: Development Management (Region 3) (hereinafter referred to as, "this Directorate") on 5 September 2018, refers.

***Identifying the relevant competent authority***

2. The property is located within a nationally proclaimed protected area (i.e. Knysna Lakes Area) as identified in terms of the National Environmental Management: Protected Areas Amendment Act, 2009 (Act no. 15 of 2009).

According to section 24C(2)(e) of the National Environmental Management Act, 1998 (Act No. 107 of 1998 as amended) ("NEMA") the National Minister for Environmental Affairs, is the competent authority for activities that will take place within a national proclaimed protected areas or other conservation area under control of a national authority.

The Western Cape Government: Department of Environmental Affairs and Development planning (this Department) is therefore not the competent authority responsible for processing the checklist request or granting environmental authorisation in respect of the activities applied for.

3. You are therefore advised to submit the enquiry or application form, and all future correspondence related to the application for Environmental Authorisation in terms of the Environmental Impact Assessment Regulation, 2014 or Section 24G of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") to the DEA:

Department of Environmental Affairs  
Integrated Environmental Authorisations: Sensitive Areas  
Private Bag X 447  
Pretoria  
0001

Attention: Mr. Danie Smit

E-mail: Dsmit@environment.gov.za  
Tel: (012) 399-9394

This Department will fulfil a commenting role once the relevant documentation is received.

***Preliminary comment on the proposal***

Notwithstanding the above, this Directorate's environmental impact management services component takes this opportunity to provide the following comments on the proposal:

4. Although the checklist has not been completed in detail, it is understood from your submission that the proposal entails the following:
  - 4.1. The development of a 25-metre tall telecommunication mast (camouflaged as a tree) with antennae and microwave dishes on it and equipment room to house the operator equipment on a footprint of approximately 112 square metres making provision for three future service providers;
  - 4.2. The compound will have a brick retaining wall and be surrounded by a 2,4-metre palisade fence with flat rap;
  - 4.3. Access to the location of the development footprint exists.
5. *Applicability of the Environmental Impact Assessment Regulations, 2014:*

Insufficient information has been provided in the checklist for this Directorate to confirm whether the proposed mast will be situated on a site regarded to be within an urban area as adopted by the competent authority on 5 March 2012, (DEA&DP NEMA EIA Circular 1 of 2012 refers).
6. The Directorate would like to advise that the Department's Guideline on Communication Networks, September 2001, be consulted. This Department encourages the sharing of masts by different service providers and co-locating on existing communication structures or tall structures. This Department supports the attachment of telecommunication broadcasting structures to existing structures/ masts in order to minimise visual impact.



With due consideration of the surrounding environment, the proponent is encouraged to consider the option of camouflaging the mast as a church steeple or even a monopole mast (or a lattice mast type) which are preferred alternatives as these simulate existing infrastructure in the urban area. This will also minimise the potential visual impact.

In contrast to this, an alternative mast camouflaged as a tree would not be in context with the surrounding environment as no tall trees or similar tall structures of that height appear in close proximity to the proposed site. **The erection of the proposed 25-metre tall tree mast is not supported.**

7. You are respectfully reminded of your general duty of care towards the environment in terms of Section 28(1) of NEMA which states:

*"Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment."*

8. Notwithstanding the content of this letter, the proponent must comply with any other statutory requirements that may be applicable to the undertaking of the proposed activity.
9. This Department reserves the right to revise its initial comments and request further information from you based on any new or revised information received.

Yours faithfully



**HEAD OF COMPONENT**  
**ENVIRONMENTAL IMPACT MANAGEMENT SERVICES (REGION 3)**  
**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Copied to:

Mr Danie Smit (DEA)

Director Planning and Development (Knysna Municipality)

Manager Town Planning and Building Control (Knysna Municipality)

E-mail: [Dsmit@environment.gov.za](mailto:Dsmit@environment.gov.za)

E-mail: [directorplanning@knysna.gov.za](mailto:directorplanning@knysna.gov.za)

E-mail: [hsmit@knysna.gov.za](mailto:hsmit@knysna.gov.za)



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E-mail Address:  
obstacles@caa.co.za  
Website Address:  
www.caa.co.za

**OBSTACLE APPROVAL**

CAA Obstacle ID: **CAA\_2018\_9\_010**

**APPLICANT**

Applicant Name: Koolcon  
 Contact Person: Willem Horn  
 Cell Nr: 0845485195  
 Tel Nr: 0319140196  
 Email: willem@koolcon.co.za  
 VAT Nr: 4820256917  
 Address: Unit D8-Deco Park-Cnr New Market and  
 City: North Riding-Johannesburg  
 Province: Gauteng  
 Postal Code: 2196

**OWNER**

Owner Name: Atlas  
 Contact Person: Helmundt Strumpher  
 Cell Nr: 0847775822  
 Tel Nr: 0847775822  
 Email: hstrumpher@atlastowers.com

Application Date: 2018/09/03 Received Date: 2018/09/04  
 Application Type:  New  Shared  Replacement  
 Attachments:  GIS/Google File  Survey Report  
 Plan/Eng Drawing  Other

**DETAILS OF PROPOSED STRUCTURE**

Type of Structure: Mast (Lattice) Construction Start Date:  
 Site Name: VGK Knysna Construction End Date:  
 Site ID: ATEC251  
 LAT (Degrees): 34 LAT (Minutes): 2 LAT (Seconds): 47.12 Jib/Guywire (m):  
 LONG (Degrees): 23 LONG (Minutes): 5 LONG (Seconds): 24.77 Datum:  
 Site Elevation (m): 115 Notes: Coord Data Source: Google Earth  
 Substructure Height (m): Other (specify):  
 Superstructure Height (m): Elevation Data Source: Google Earth  
 Structure Elevation (m): 145 Other (Specify):

**APPROVAL STATUS: CONDITIONALLY APPROVED**

- Note: 1. Conditional Approval only valid for 5 years from date of signature.  
 2. Final approval subject to applicant/owner providing 'As-Built' data.

**Approval Conditions:**

- No Markings  
 Day Markings  
 Night Markings  
 Day/Night Markings  
 UPS  
 Other/Special

**Other/Special Conditions:**

FOR THE SACAA



## Department of Health

Directorate: Radiation Control  
Private Bag X62  
BELLVILLE  
7535

☎: 021 957 7483  
Fax: 021 946 1589  
E-mail: [DuToiL@health.gov.za](mailto:DuToiL@health.gov.za)

Enquiries: LL du Toit  
Date: 23 June 2015

### To whom it may concern

#### HEALTH EFFECTS OF CELLULAR BASE STATIONS AND HANDSETS

The Directorate: Radiation Control is the section within the National Department of Health that is responsible, from the viewpoint of human health, for regulating electronic products producing **non-ionising** electromagnetic fields (EMF), i.e. where the frequency of such EMF is less than 300 GHz. In carrying out this responsibility, the Directorate has been utilising the World Health Organization's (WHO) International EMF Project ([www.who.int/peh-emf/en/](http://www.who.int/peh-emf/en/)) as its primary source of information and guidance with respect to the health effects of EMF. The International EMF Project was established by the WHO in 1996 to (i) assess the scientific evidence for possible adverse health effects of non-ionising electromagnetic fields on an on-going basis, (ii) initiate and coordinate new research in this regard, and (iii) compile health risk assessments for different parts of the electromagnetic spectrum. The Department of Health has been a member of the International Advisory Committee of the International EMF Project since 1998.

In June 2005 the International EMF Project hosted a workshop that was specifically aimed at considering the possible health consequences of the emissions from cellular base stations and wireless networks. The findings of this workshop were summarised in a 2-page Fact Sheet (<http://www.who.int/peh-emf/publications/facts/fs304/en/>). The following extract from this Fact Sheet is still considered by the WHO as a summary of the findings to date, i.e. ***“Considering the very low exposure levels and research results collected to date, there is no convincing scientific evidence that the weak RF signals from base stations and wireless networks cause adverse health effects.”***

Another WHO Fact Sheet was published in June 2011 and reviewed in October 2014, i.e. *Electromagnetic fields and public health: mobile phones*. This Fact Sheet can be found at <http://www.who.int/mediacentre/factsheets/fs193/en/> and the conclusion is stated as follows:

***“A large number of studies have been performed over the last two decades to assess whether mobile phones pose a potential health risk. To date, no adverse health effects have been established as being caused by mobile phone use.”***

The WHO recommends utilising internationally recognised exposure guidelines such as those published in 1998 by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) and reconfirmed in 2009 for the frequency range 100 kHz – 300 GHz (i.e. including all the frequencies employed by the cellular industry). The Department of Health likewise recommends the use of these ICNIRP guidelines to protect people against the known adverse health effects of EMF.

The numerous measurement surveys, which have been conducted around the world and in South Africa, have shown that the actual levels of public exposure as a result of base station emissions invariably are only a fraction of the ICNIRP guidelines, even in instances where members of the public have been really concerned about their exposure to these emissions. At present there is **no** confirmed scientific evidence that points to any health hazard associated with the very low levels of exposure that the general public would typically experience in the vicinity of a cellular base station. The Department is therefore satisfied that the health of the general public is not being compromised by their exposure to the microwave emissions of cellular base stations. This also means that local and other authorities, in considering the environmental impact of any particular base station, do not need to and should not attempt, from a public health point of view, to set any restrictions with respect to parameters such as distance to the mast, duration of exposure, height of the mast, etc.

The Department of Health is not able to make any pronouncements about the specific levels of EMF that a member of the public would experience at any particular base station site when it is in operation. However, generally-speaking unless a person would climb to the top of a mast (or other structure supporting an antenna) and position him/herself not more than a few meters away right in front of the active antenna, such a person would have no real possibility of being exposed to even anywhere near the afore-mentioned ICNIRP guideline limits. Since these base stations are typically cordoned off by means of barbed wire fencing and locked gates/doors in order to protect the sensitive and expensive technology, getting to a mast and actually climbing it despite the afore-mentioned security measures would certainly not be considered responsible behaviour. Even then the only real threat to the health of the person would be falling at any height from the structure in question. Based on the results of numerous global and local surveys, the experience has been that the exposure to base station EMF at ground level is typically in the range of between 0.001 – 1.0 % of the afore-mentioned ICNIRP guideline limits. Against this background of available data, there

would be no scientific grounds to support any allegation that adverse health effects might be suffered by a responsible member of the public due to the EMF emitted by a base station.

Although the Department of Health currently neither prescribes nor enforces any compulsory exposure limits for electromagnetic fields, the Department does advise all concerned (whether they be a government department, the industry or the public) that voluntary compliance with the afore-mentioned ICNIRP exposure guidelines is the recommended and science-based way to deal with any situation involving human exposure to the non-ionising electromagnetic fields emitted by cellular base stations and handsets.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'LL du Toit', written in a cursive style.

**LL du Toit**  
DEPUTY DIRECTOR: RADIATION CONTROL