

**PROPOSED 25M TELECOMMUNICATIONS TREE MAST,
HORNLEE, KNYSNA
WESTERN CAPE**

APPLICANT: Atlas Tower (Pty) Ltd

PRE-APPLICATION COMMENT AND RESPONSE TRAIL REPORT

(DEA&DP REF. NO.: 16/3/3/6/1/D4/16/1050/18; DEA REF. NO.: To be provided)

No.	Comment Date, Comment Format, Organisation/I&AP	Comment	Response from EAP/Applicant/Specialist/Project Manager
1	<p>Date: 17/09/2018 Format: Conditional approval document I&AP: South African Civil Aviation Authority (SACAA)</p>	<p>1.1. Receipt of conditional obstacle approval from SACAA (Obstacle ID: 2018 9 010). Only stipulation is night markings and 'as built' data to make conditional approval final.</p>	<p>EAP: 1.1. Registration of I&AP and cognisance taken of conditions (included in DBAR and EMP as required).</p>
2	<p>Date: 17/09/2018 Format: Email letter I&AP: Francois Naudé, Environmental Impact Management Services (Region 3), Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)</p>	<p>1.1. Acknowledgement of receipt of applicability checklist (dated 04/09/2018) from BJB Project Services CC on 05/09/2018 and comments on content thereof. 1.2. Comment that proposed development property is located within a nationally protected area i.e. the Knysna Lakes Area, and explanation that, according to the National Environmental Management: Protected Areas Amendment Act (NEM:PAAA), DEA&DP is not the competent authority. 1.3. Advice that according to S24C(2)(e) of the National Environmental Management Act (NEMA) enquiry or application must be submitted to the DEA. Provision of contact details for the DEA and note that DEA&DP will fulfil a commenting role. 1.4. Preliminary comments received note that:</p>	<p>EAP: 1.1. Registration of I&AP 1.2. & 1.3. Cognisance taken of comments (attached as Appendix F1 of DBAR). March 2019 - Telephonic contact with DEA&DP (Francois Naudé) re. national park area and pre-application PPP. Informed that initial letter from DEA&DP still applies and that DEA is competent authority but DEA&DP will also comment. Request from Francois Naudé for a hardcopy of the DBAR to be sent to DEA&DP as well. 16/07/2019 - Telephonic contact attempted with DEA (Danie Smit) as per DEA&DP advice – Contact made with DEA Environmental Officer Specialised Production: EIA Coordination, Strategic Planning and Support (Azrah</p>

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		<p>a. the development consists of a 25m tall telecommunications tree mast with antenna and microwave dishes and equipment room to make provision for three service providers (development footprint approximately 112m²).</p> <p>b. the compound will have a brick retaining wall surrounded by a 2,4m palisade fence with flat wrap.</p> <p>c. access to the development footprint exists.</p> <p>1.5. Note that in terms of the Environmental Impact Assessment Regulations (2014), insufficient information was provided in the checklist to confirm whether the proposed development would be situated within an urban area.</p> <p>1.6. Advice to refer to DEA&DP's guideline on communication networks (sharing of masts by different service providers and co-location on existing communication or tall structures). Note that the Department supports attachment of telecommunication broadcasting structures to existing structures/masts to minimize visual impact. Encouragement for the proponent to camouflage the proposed development as a church steeple or a monopole or lattice mast which is preferred as they simulate existing infrastructure and will minimize potential visual impact.</p> <p>1.7. Reminder of general duty of care principle under the NEMA.</p> <p>1.8. Reminder to comply with any other statutory requirements that may be applicable.</p> <p>1.9. Note that DEA&DP reserves its right to revise its initial comment and request further information.</p>	<p>Essop) - Told to submit application and a case officer will be assigned but not necessarily from the Protected and Sensitive Areas Section of the Integrated Environmental Assessment's Department.</p> <p>1.4. to 1.9. Cognisance taken of comments and information included/clarification given in DBAR and EMPr.</p>
3	<p>Date: 01/03/2019 Format: Email I&AP: Knysna Municipality, represented by Ms. Pamela Booth, Manager: Environmental Planning</p>	<p>1.1. Request for Knysna Municipality to be registered as an I&AP with all correspondence to be sent to Ms. Booth's office.</p>	<p>EAP:</p> <p>1.1. Email response sent on 08/03/2019 confirming registration of I&AP.</p>
4	<p>Date: 04/03/2019 Format: Email Letter I&AP: Heritage Western Cape (HWC) – Letter signed by Dr Mxolisi Dlamuka, Chief Executive Officer, HWC. HWC</p>	<p>1.1. Final comment email received from HWC states that application has been approved and a permit issued in terms of the NHRA.</p> <p>1.2. Final comment letter received from HWC states that no further action under section 38 of the NHRA is required.</p> <p>1.3. Request that should any heritage resources be discovered during execution of the activities, all works must be immediately stopped and HWC notified without delay.</p>	<p>EAP:</p> <p>1.1. & 1.2. Registration of I&AP. Cognisance taken of approval and final comment for Case Number:19013112KB0212E (attached as Appendix F1 of DBAR).</p>

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	contact person – Khanyisile Bonile	1.4. The letter does not exonerate the Applicant from obtaining any other statutory approvals. 1.5. Note that HWC reserves its right to request further information.	1.3. to 1.5. Inclusion of specific conditions and contact details (as provided in HWC comment) in DBAR and EMPr as required.
5	Date: 07/03/2019 Format: Email I&AP: South African National Road Agency (SOC) Limited (SANRAL) - Ms. Nicole Abrahams, Environmental Coordinator, Western Cape, SANRAL	1.1. Acknowledgement of receipt of pre-application information. 1.2. Request to indicate how far the telecommunications mast is from the nearest National road. 1.3. Comment that if the mast falls within a 500m radius of an intersection, SANRAL needs to provide comment.	EAP: 1.1. Registration of I&AP (inclusion of Ms. De Kock as SAMRAL representative) 1.2. & 1.3. Email response sent to Nicole Abrahams on 08/03/2019. Follow-up email requesting SAMRAL response sent to Nicole Abrahams on 01/07/2019. 1.3. SANRAL requirements included in DBAR and EMPr as relevant.
6	Date: 27/03/2019 Format: Email letter (original letter received via postage as well) I&AP: Letter signed by Mr Jan van Staden, Chief Executive Officer (Acting), Breede-Gouritz Catchment Management Agency (BGCMA). BGCMA contact person – R Makahane	1.1. BGCMA comment that PPP documents received seem to indicate that the proposed project does not trigger any water use. 1.2. Further comment that if a water use for the project be identified, application for a suitable authorisation before project commencement will be required. 1.3. The letter does not exempt the Applicant from compliance with any other legal requirements. Adherence to this rests with the property owner. 1.4. Note that BGCMA reserves its right to amend its comments, as well as request further information.	EAP: 1.1. & 1.2. Registration of I&AP. Cognisance taken of comment for BGCMA reference number: 4/10/2/K50B/ERF 3244, Hornlee (attached as Appendix F1 of DBAR). 1.3. to 1.4. Inclusion of specific conditions and contact details (as provided in HWC comment) in DBAR and EMPr as required.
7		END OF TRAIL REPORT	