



**REFERENCE NUMBER:** 16/3/3/6/7/1/A5/87/2062/21  
**ENQUIRIES:** Ms. N. Wookey  
**DATE:** **04 JUNE 2021**

The Director  
CTC Operations (Pty) Ltd.  
4 Pastoral Avenue  
Durbanville Business Park  
**DURBANVILLE**  
7550

**For Attention: Mr. L. Kruger**

Tel: (021) 111 0466

Email: [Lian@ctc-ops.co.za](mailto:Lian@ctc-ops.co.za)

Dear Sir

**ACKNOWLEDGEMENT OF RECEIPT AND COMMENT ON THE PUBLIC PARTICIPATION PLAN AND SITE SENSITIVITY VERIFICATION REPORT FOR THE PROPOSED 35M HIGH TELECOMMUNICATION MAST AND ASSOCIATED INFRASTRUCTURE ON PORTION 22 OF FARM ZOUTERIVIER NO. 22, PHILADELPHIA.**

1. The Notice of Intent ("NOI") dated 30 March 2021 and received by this Department via electronic mail correspondence on 13 April 2021 and this Directorate's acknowledgement thereof dated 16 April 2021, this Directorate's correspondence dated 07 May 2021, the additional information dated and received by this Department via electronic mail correspondence on 19 May 2021, the pre-application meeting held between the Environmental Assessment Practitioner ("EAP") and officials from this Directorate on 27 May 2021 and the Public Participation Plan dated and received by this Directorate via electronic mail correspondence on 27 May 2021, refer.
2. This letter serves as acknowledgment of the revised Site Sensitivity Verification Report (dated 19 May 2021) and the Public Participation Plan (dated 27 May 2021) by this Directorate and to provide comments on the aforementioned documents.
3. Comment on the aforementioned documents are therefore as follows:
  - 3.1. Based on the information provided in the revised Site Sensitivity Verification Report (dated 19 May 2021), please note the following:
    - 3.1.1. This Directorate notes that the medium sensitivity rating for the agricultural theme, as identified by the Screening Report (dated 16 March 2021), has been disputed and determined to be insignificant by the EAP due to the unsuitable location of the proposed site for agricultural activities, the proximity to the overhead powerlines and the unlikelihood to support any agricultural activity. This Directorate agrees that no further assessment will be required.

- 3.1.2. This Directorate notes that the medium sensitivity rating for the animal species theme, as identified by the Screening Report (dated 16 March 2021), has been disputed and determined to be insignificant by the EAP due to the transformed nature of the proposed site and anthropogenic activities as a disturbance factor. This Directorate agrees that no further assessment will be required.
  - 3.1.3. This Directorate notes that the low sensitivity rating for the aquatic biodiversity species theme, as identified by the Screening Report (dated 16 March 2021), has been disputed and determined to be insignificant by the EAP due to the fact that no watercourses are located within the proposed site and no indigenous aquatic biodiversity was noted. This Directorate agrees that no further assessment will be required.
  - 3.1.4. This Directorate notes that the low sensitivity rating for the archaeological and cultural heritage theme, as identified by the Screening Report (dated 16 March 2021), has been disputed and determined to be insignificant by the EAP. A Notice of Intent to Develop ("NID") will be submitted to Heritage Western Cape. Heritage Western Cape's response to the NID will determine whether any further assessment will be required. This Directorate agrees with the proposed way forward in this regard.
  - 3.1.5. This Directorate notes that the high sensitivity rating for the civil aviation theme, as identified by the Screening Report (dated 16 March 2021), has been disputed and determined to be of medium sensitivity due to the fact that a permit for the departure of height restrictions has been obtained. In addition, the proposed site is located within 8km of the nearest aviation facility / aerodrome (i.e. Aerosport Flight Training, Klipheuwel). Please note that according to the Protocols, where the civil aviation sensitivity rating is deemed as medium, a Civil Aviation Compliance Statement is required and must be submitted as part of the BAR.
  - 3.1.6. This Directorate notes that the low sensitivity rating for the defence theme, as identified by the Screening Report (dated 16 March 2021), has been disputed and determined to be insignificant by the EAP due to the fact that no defence related zones or structures have been designated on or within close proximity of the proposed site. This Directorate agrees that no further assessment will be required.
  - 3.1.7. This Directorate notes that the low sensitivity rating for the palaeontological theme as identified by the Screening Report (dated 16 March 2021), has been disputed by the EAP and determined to be insignificant due to the extent of the proposed development in relation to the South Africa Heritage Resources Information System ("SAHRIS") Palaeontological Online Map Tool. A Notice of Intent to Develop ("NID") will be submitted to Heritage Western Cape. Heritage Western Cape's response to the NID will determine whether any further assessment will be required. This Directorate agrees with the proposed way forward in this regard.
  - 3.1.8. This Directorate notes that the low sensitivity rating for the plant species theme, as identified in the Screening Report (dated 16 March 2021), has been disputed by the EAP and determined to be insignificant due to the disturbed nature of the proposed site and that no species of conservation concern have been noted on the proposed site. This Directorate agrees that no further assessment will be required.
  - 3.1.9. This Directorate notes that the very high sensitivity rating for the terrestrial biodiversity theme, as identified in the Screening Report (dated 16 March 2021), has been disputed by the EAP and determined to be insignificant by the EAP due to the disturbed nature of the proposed site, no observation of animal species and nearby anthropogenic activities are considered a disturbance factor. This Directorate agrees that no further assessment will be required.
- 3.2. Furthermore, this Directorate notes that no specialist assessments will be undertaken as part of the Basic Assessment process.

- 3.3. Please note that input from a visual specialist will be required should the proposed development be assessed to result in unacceptable visual impacts.
- 3.4. Public Participation
- 3.4.1. Based on the information contained in the Public Participation Plan (dated 27 May 2021), this Directorate agrees to your methods of conducting the Public Participation Process as outlined in the Public Participation Plan (dated 27 May 2021) on condition that the following methods are added to the Public Participation Plan (dated 27 May 2021):
- 3.4.1.1. Where written comments cannot be provided (either via email or hard copy), provision for a comments box, WhatsApp Messaging Service and/or telephonic recording of comments must be provided;
- 3.4.1.2. Existing community structures should be used, as far as practically possible, for communication required in terms of this project; and
- 3.4.1.3. The use of zero data portals should be made available, if required.
- 3.4.2. Documentation must be submitted via email to the case officer, with attached pdf versions of the report or, if too large to attach to an email, to be made available via an electronic link provided in the email that is accessible by the Directorate. The Directorate may require that a hard copy of the reports also be submitted to the Department by a certain date, but will advise you accordingly.
- 3.4.3. Please be reminded that the Public Participation Process must fulfil the requirements outlined in Chapter 6 of the EIA Regulations, 2014 (as amended), and must take into account any applicable guidelines published in terms of Section 24J of the National Environmental Management Act, 1998 (Act No. 107 of 1998), this Department's Circular EADP 0028/2014 on the "One Environmental Management System" and the EIA Regulations, 2014 (as amended), as well as any other guidance provided by this Department.
4. Please note that the activity may not commence prior to obtaining an environmental authorisation from the competent authority.
5. Kindly quote the above-mentioned reference number in any future correspondence in respect of the pre-application.

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

Yours faithfully

**p.p.** \_\_\_\_\_  
**HEAD OF DEPARTMENT**

Copies to: (1) Mr. M. Theron (City of Cape Town: ERM)  
(2) Mr. A. Mader (EnviroAfrica CC)

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