

APPENDIX F2_ COMMENTS AND RESPONSE REPORT: PRE-APPLICATION DRAFT BAR: PROPOSED DEVELOPMENT OF A 35M HIGH TELECOMMUNICATION MAST ON PORTION 22 OF FARM 22, ZOUTERIVIER, WESTERN CAPE

COMMENTS ON INITIAL NOTIFICATION

Date	I&AP	Comment	Response	Respondent
25/02/2021	F. J. Rossouw	It will be appreciated if you would register our director, Felicity Rossouw, as an I&AP in the above regard.	Thank you. Please note that you have been registered as an I&AP.	EnviroAfrica
26/01/2021	Giovanni Mangiagalli	Will this mast be used for 5G telecoms as well or are you not aware of what they shall be doing on the tower?	<p>At present time ICASA has not released the 5G spectrum to the network providers. However, the 5G spectrum is expected to be auctioned off early-to-mid 2021. As soon as the network providers have acquired 5G spectrum I assume that 5G equipment will be installed nationwide in areas that would be able to best utilise 5G's capabilities.</p> <p>5G is expected to be prioritised in Metropolises due to having network support with telecommunication infrastructure within close vicinity to one another. Due to 5G using a much shorter wavelength than 4G, I can't seem to think that rural sites would be desirable for 5G roll-out within the near future.</p> <p>We are only the infrastructure providers who sub-lease space for network providers.</p> <p>Something worth mentioning to the members of the community are:</p> <ul style="list-style-type: none"> • Any network provision roll-out (such as 3G, 4G and 5G) have been investigated by governing authorities (below) and have been approved for public roll-out globally. <ul style="list-style-type: none"> ○ ICASA – Independent Communications Authority of South Africa (This group regulates the communications sector in the public interest). ○ NDoH – National Department of Health <p>WHO – World health organisation</p>	EnviroAfrica and Applicant
27/01/2021	Eskom: Land and Rights,	I have no comments on the proposed development.	Thank you for your response, it has been noted.	EnviroAfrica

	Eskom Transmission Division (John Geeringh / GeerinJH@eskom.co.za)			
01/02/2021	CapeNature (Marius Wheeler / mwheeler@capenature.co.za)	CapeNature has no objection to this proposed development.	Thank you. It is noted that CapeNature have no objection to the proposed development.	EnviroAfrica
08/02/2021	Civil Aviation Authority (Lizell Stroh, 083 461 6660 / Strohl@caa.co.za)	<p>Good day Anthony, the SACAA requires the Developer(applicant) to apply for an Obstacle approval.</p> <p>This would form part of the SACAA appellation/ Comments approval with Conditions process.</p> <p>Please find the relevant process to follow. http://www.caa.co.za/Pages/Obstacles/Urgent-notice.aspx http://www.caa.co.za/Obstacles%20Forms/CA139-27.pdf http://www.caa.co.za/Documents/Obstacle%20Application%20Process%2020180105.pdf</p> <p>Please feel free in contacting the inspectorate in more information are required.</p>	<p>Good day,</p> <p>Thank you for providing comment on the proposed project.</p> <p>Please refer to Appendices E15.2.1 and E15.2.2.</p>	
12/02/2021	Rodney Moulton / rmoulton@gmail.com	Can you please advise if a fibre line will connect the tower to the network? If so, will fibre connectivity be available to the surrounding properties?	This will be confirmed.	EnviroAfrica
15/02/2021	Rondeberg Neighbourhood Watch (Angela Bryant / AngelaB@astraja.co.za)	Duly noted and posted to all Rondeberg Neighbourhood Watch WhatsApp and Telegram groups this morning, for members and residents of the area to be informed of.	Noted, thank you for your comment. It has been noted that the Rondeberg Neighbourhood Watch has been notified.	EnviroAfrica
22/02/2021	PetroSA (Tracey Cosgrove / tracey.cosgrove@petrosa.co.za)	<p>I wish to register as an interest and affected party on the above-mentioned project.</p> <p>Please provide specifications of the type of tower to be erected. Is this 5G?</p>	<p>Thank you for your email. Please note that you have been registered as an I&AP.</p> <p>At present time ICASA has not released the 5G spectrum to the network providers. However, the 5G spectrum is expected to be auctioned off early-to-mid 2021. As soon as the network providers have acquired 5G spectrum I assume that 5G equipment will be installed nationwide in areas that would be able to best utilise 5G's capabilities.</p> <p>5G is expected to be prioritised in Metropolises due to having network support with telecommunication infrastructure within close vicinity to one another. Due to 5G using a much shorter wavelength than 4G, I can't seem to think that rural sites would be desirable for 5G roll-out within the near future.</p> <p>We are only the infrastructure providers who sub-lease space for network providers.</p> <p>Something worth mentioning to the members of the community are:</p>	EnviroAfrica and Applicant

			<ul style="list-style-type: none"> • Any network provision roll-out (such as 3G, 4G and 5G) have been investigated by governing authorities (below) and have been approved for public roll-out globally. <ul style="list-style-type: none"> ○ ICASA – Independent Communications Authority of South Africa (This group regulates the communications sector in the public interest). ○ NDoH – National Department of Health ○ WHO – World health organisation 	
25/02/2021	City of Cape Town: Spatial Planning & Environment Directorate, Environmental Management Department (Morné Theron / morne.theron@capetown.gov.za)	<p>The Notice of Intent to Develop (NID), dated 26 January 2021, pertaining to the abovementioned farm, refers.</p> <p>1. Kindly register the Environmental Management Department: Blaauwberg District as the official City of Cape Town entry point for comment on the aforementioned Basic Assessment Report. Be advised that the Environmental Management Department (EMD) is the duly mandated department to provide co-ordinated City comment on EIAs conducted within the municipality's jurisdiction. As the subject farm falls within the Blaauwberg District of the City of Cape Town all future reports must be submitted to this office for comment.</p> <p>2. In order for the City to meet the statutory commenting deadline(s) you are required to timeously submit electronic copy (i.e. flash disk) and 1 x hard copy of the various Environmental Impact Assessment reports to this office before EMD can circulate the draft reports to all our affected line departments. The public participation commenting period will be calculated from the date that this office receives the flash disk and hard copy. As such please ensure that the necessary documentation is delivered to our physical address as stated below.</p> <p>3. In the interim the following comment is provided based on the information provided in the BID:</p> <p>3.1. The City of Cape Town Telecommunication Mast Infrastructure Policy (2015) must be listed. The proposed mast must be assessed against the policy's objectives.</p> <p>3.2. According to the City of Cape Town: Biodiversity Map the subject farm does not support any critical biodiversity areas (CBA). Figure 2 below shows the botanical significance map (2021) and the CBAs on the abutting farms.</p> <p>Be advised that a land use departure application will be required in terms of the Cape Town Municipal Planning By-law. The draft Basic Impact Assessment Report (BAR) must acknowledge the same.</p> <p>The abovementioned comment must be included in the draft BAR.</p>	<p>Thank you for your comment.</p> <ol style="list-style-type: none"> 1. Please note that the Environmental Management Department: Blaauwberg District has been registered as the I&AP for the CoCT. 2. Noted. 1 x hard copy and 1 x electronic copy will be submitted to our No 87 Pienaar Road, Milnerton municipal office (Weekdays 08h00 to 15h00) 3. Ask at the Security Entrance for them to call Mr Ronald Claasen (Tel: 021 444 0602) at EMD to take acceptance thereof. <ol style="list-style-type: none"> 3.1. Please note that the CoCT Telecommunication Mast Infrastructure Policy (2015) has been considered and incorporated in the Pre-Application Draft BAR. 3.2. It is confirmed that the site is not located within a CBA. <p>Please note that we have already obtained land-use approval for consent & height permanent departure for a 35m lattice structure.</p>	EnviroAfrica and Applicant

COMMENTS ON NOI				
13/04/2021	DEADP: Directorate: Development Management (Region 1)	<p>This Directorate confirms receipt of your correspondence.</p> <p>The NOI has been assigned to Naadiya Wookey. Please forward any future correspondences regarding the proposal to Naadiya and her manager, Keagan-Leigh Adriaanse.</p>	<p>Thank you for confirming receipt of the NOI.</p> <p>It is noted that Ms Naadiya Wookey is the case officer.</p>	EnviroAfrica
16/04/2021	DEADP: Directorate: Development Management (Region 1) (Ms. Naadiya Wookey / Naadiya.Wookey@westerncape.gov.za)	<p>1. Your Notice of Intent (“NOI”) dated 30 March 2021 and received by this Department via electronic mail correspondence on 13 April 2021, refers.</p> <p>2. This letter serves as an acknowledgement of receipt of the above-mentioned document by this Directorate.</p> <p>3. A comment on the NOI will be provided in due course.</p> <p>The Directorate reserves the right to revise or withdraw comments or request further information based on any information received.</p> <p>Your interest in the future of our environment is greatly appreciated.</p>	<p>1. Noted with thanks.</p> <p>2. Noted with thanks.</p> <p>3. Noted. We look forward to your Department’s comments on the NOI.</p>	EnviroAfrica
18/04/2021	Heritage Western Cape (Ameerah Peters / Ceoheritage@westerncape.gov.za)	I acknowledge receipt of your Sec 38 NID application submitted for Ptn 22 of Farm 22 Zouterivier received on 15 April 2021. Please allow 10 working days to pass before following up further. The assigned case officer will be in contact going forward	Noted with thanks.	EnviroAfrica
06/05/2021	DEADP: Directorate: Development Management (Region 1) (Ms. Naadiya Wookey / Naadiya.Wookey@westerncape.gov.za)	<p>NOTICE OF INTENT TO SUBMIT AN APPLICATION IN TERMS OF THE NEMA EIA REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED 35M HIGH TELECOMMUNICATION MAST AND ASSOCIATED INFRASTRUCTURE ON PORTION 22 OF FARM ZOUTERIVIER NO. 22, PHILADELPHIA.</p> <p>Your 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, refer.</p>	<p>Noted, thank you for your comments regarding the submitted nOI for the aforementioned project.</p>	EnviroAfrica
		<p>2. This letter serves as comment on the aforementioned NOI. Comments on the NOI are therefore as follows:</p> <p>2.1. Applicable listed activities</p> <p>2.1.1. Based on the information contained in the NOI, the proposed development will trigger the following listed activities in terms of the NEMA EIA Regulations, 2014 (as amended), namely:</p> <p>Listing Notice 3 of the NEMA EIA Regulations, 2014 (as amended) Activity No. 3 Activity Description <i>The development of masts or towers of any material or type used for telecommunication broadcasting or radio transmission purposes where the mast or tower—</i> <i>(a) is to be placed on a site not previously used for this purpose; and</i> <i>(b) will exceed 15 metres in height—</i> <i>but excluding attachments to existing buildings and masts on rooftops.</i></p> <p>i. Western Cape <i>i. All areas outside urban areas;</i></p>	<p>Noted.</p> <p>2.1. Noted and confirmed.</p>	

		<p>ii. Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority, or zoned for a conservation purpose, within urban areas; or</p> <p>iii. Areas zoned for use as public open space or equivalent zoning within urban areas.</p> <p>2.1.2. A Basic Assessment process must be followed in order to apply for environmental authorisation. You are hereby advised that only that activity applied for will be considered for authorisation. The onus is on the applicant to ensure that the applicable listed activity is applied for and assessed as part of the EIA process.</p>	<p>2.1.2. Noted. A BAR process will be followed.</p>	
		<p>2.2. Screening Report, Protocols and Specialist Assessments</p>	<p>2.2. Please find responses below.</p>	
		<p>2.2.1. According to the Screening Report (generated by the Screening Tool developed by the National Department of Environmental Affairs and dated 16 March 2021), the proposed site is located within;</p> <ul style="list-style-type: none"> • a medium sensitivity area from an agricultural perspective, • a medium sensitivity area from an animal species perspective, • a low sensitivity from an aquatic biodiversity perspective, • a low sensitivity from an archaeological and cultural heritage perspective, • a high sensitivity area from a civil aviation perspective, • a low sensitivity area from a defence perspective, • a low sensitivity area from a palaeontological perspective, • a low sensitivity area from a plant species perspective and • a very high sensitivity area from a terrestrial biodiversity perspective. 	<p>2.2.1. Noted. The following is confirmed as being stipulated in the DEA Screening Tool.</p> <ul style="list-style-type: none"> • Confirmed. • Confirmed • Confirmed • Confirmed • Confirmed • Confirmed • Confirmed • Confirmed • Confirmed 	
		<p>2.2.2. In addition, the Screening Report (dated 16 March 2021) identified the following specialist studies to be undertaken:</p> <p>2.2.2.1. Landscape/ Visual Impact Assessment</p> <p>2.2.2.2. Archaeological and Cultural Heritage Impact Assessment</p> <p>2.2.2.3. Palaeontological Impact Assessment</p> <p>2.2.2.4. Terrestrial Biodiversity Assessment</p> <p>2.2.2.5. Aquatic Biodiversity Assessment</p> <p>2.2.2.6. Civil Aviation Assessment</p> <p>2.2.2.7. Defence Assessment</p> <p>2.2.2.8. RFI Assessment</p> <p>2.2.2.9. Geotechnical Assessment</p> <p>2.2.2.10. Plant Species Assessment</p> <p>2.2.2.11. Animal Species Assessment</p>	<p>2.2.2. Noted. The following is confirmed as being stipulated in the DEA Screening Tool.</p> <p>2.2.2.1. Confirmed</p> <p>2.2.2.2. Confirmed</p> <p>2.2.2.3. Confirmed</p> <p>2.2.2.4. Confirmed</p> <p>2.2.2.5. Confirmed</p> <p>2.2.2.6. Confirmed</p> <p>2.2.2.7. Confirmed</p> <p>2.2.2.8. Confirmed</p> <p>2.2.2.9. Confirmed</p> <p>2.2.2.10. Confirmed</p> <p>2.2.2.11. Confirmed</p>	
		<p>2.2.3. Based on the information provided in the undated site sensitivity verification report, please note the following:</p> <p>2.2.3.1. 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 of low sensitivity area given the unsuitable location of the proposed site for agricultural activities and the overhead powerlines. According to the Protocols, where the agricultural sensitivity rating is deemed as low, an Agricultural Compliance Statement is required. An Agricultural Compliance Statement should therefore be submitted as part of the Basic Assessment Report ("BAR").</p>	<p>2.2.3.1. Please refer to Appendix I.2 for revised SSV Report.</p>	

	<p>2.2.3.2. 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 of a low sensitivity area given the transformed nature of the proposed site and anthropogenic activities as a disturbance factor. According to the Protocols, where the terrestrial animal species rating is deemed as low, a Terrestrial Animal Species Compliance Statement is required. A Terrestrial Animal Species Compliance Statement should therefore be submitted as part of the BAR.</p>	2.2.3.2. Please refer to Appendix I.2 for revised SSV Report.	
	<p>2.2.3.3. The high sensitivity rating for the civil aviation theme, as identified by the Screening Report (dated 16 March 2021), has been confirmed. A Civil Aviation Compliance Statement must therefore be provided as part of the BAR.</p>	2.2.3.3. Please refer to Appendix I.2 for revised SSV Report.	
	<p>2.2.3.4. The very high sensitivity rating for the terrestrial biodiversity theme, as identified in the Screening Report (dated 16 March 2021), has been disputed and determined to be of a low sensitivity. The determination is based on the transformed nature of the proposed site and anthropogenic activities as a disturbance factor. According to the Protocols, where the terrestrial animal species rating is deemed as low, a Terrestrial Biodiversity Compliance Statement is required. A Terrestrial Biodiversity Compliance Statement should therefore be submitted as part of the BAR.</p>	2.2.3.4. Please refer to Appendix I.2 for revised SSV Report.	
	<p>2.2.3. Based on the information provided in the undated site sensitivity verification report, please note the following:</p> <p>2.2.3.1. 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 of low sensitivity area given the unsuitable location of the proposed site for agricultural activities and the overhead powerlines. According to the Protocols, where the agricultural sensitivity rating is deemed as low, an Agricultural Compliance Statement is required. An Agricultural Compliance Statement should therefore be submitted as part of the Basic Assessment Report ("BAR").</p>	2.2.3.1. Please refer to Appendix I.2 for revised SSV Report.	
	<p>2.2.3.5. The low sensitivity ratings for the aquatic biodiversity species theme, the archaeological and cultural heritage theme, the defence theme, the palaeontological theme and the plant species theme, as identified in the Screening Report (dated 16 March 2021), has been confirmed to be of a low sensitivity. The applicable compliance statements for each environmental theme must be provided as part of the BAR.</p>	2.2.3.5. Please refer to Appendix I.2 for revised SSV Report.	
	<p>2.2.4. Please note that the site sensitivity verification report does not provide motivation as to whether a Geotechnical Assessment and/or RFI Assessment will be undertaken. You are reminded that it is the Environmental Assessment Practitioner's responsibility to motivate whether the aforementioned studies will be undertaken as part of the Basic Assessment process.</p>	2.2.4. Please refer to Appendix I.2 for revised SSV Report.	
	<p>2.2.5. In addition, please note that where a specialist assessment is required, but no specific environmental theme protocol has been prescribed, the level of assessment must be based on the findings of the site sensitivity verification and must comply with Appendix 6 of the NEMA EIA Regulations, 2014 (as amended).</p>	2.2.5. Please refer to Appendix I.2 for revised SSV Report.	
	<p>2.3. Content of a Basic Assessment Report ("BAR")</p>	2.3.	
	<p>2.3.1. You are referred to Appendix 1 of the NEMA EIA Regulations, 2014 (as amended) for the requirements with respect to the 'Content of basic assessment reports'.</p>	2.3.1. Noted.	
	<p>2.4. You are advised that when undertaking the Basic Assessment process/ Scoping/EIR process, you must take into account all applicable guidelines, including the guidelines developed by the Department. These can be downloaded from the Department's website.</p>	2.4. Noted. These guidelines as well as CoCT guidelines were taken into consideration during the compilation of the Pre-Application DBAR.	

		<p>In particular, the guidelines that may be applicable to the proposed development include, inter alia, the following:</p> <ul style="list-style-type: none"> • Circular EADP 0028/2014: One Environmental Management System. • Guideline for the Review of Specialist Input in the EIA process (June 2005). • Guideline for Environmental Management Plans (June 2005). • Guideline on Alternatives (March 2013). • Guideline on Need and Desirability (March 2013). <p>Other (as applicable).</p>		
		<p>2.5. Exemptions 2.5.1. The Directorate notes that you do not intend to apply for exemption from any provisions contained in the NEMA EIA Regulations, 2014 (as amended) or the NEMA. Please note that should exemption from any provisions contained in the NEMA EIA Regulations, 2014 (as amended) or the NEMA be required, an exemption application must be submitted and the exemption process must be finalised before submitting an application for Environmental Authorisation to the competent authority.</p>	<p>2.5. Noted.</p>	
		<p>2.6. Alternatives 2.6.1. Be advised that in terms of the NEMA EIA Regulations, 2014 (as amended) and the NEMA the investigation of alternatives is mandatory. All alternatives identified must therefore be investigated to determine if they are feasible and reasonable. In this regard it must be noted that the Department may grant authorisation for an alternative as if it has been applied for or may grant authorisation in respect of all or part of the activity applied for as specified in Regulation 20 of the NEMA EIA Regulations, 2014 (as amended). Alternatives are not limited to activity alternatives, but include layout alternatives, design, activity, operational and technology alternatives. Every EIA process must therefore identify and investigate alternatives, with feasible and reasonable alternatives to be comparatively assessed. If, however, after having identified and investigated alternatives, no feasible and reasonable alternatives were found, no comparative assessment of alternatives, beyond the comparative assessment of the preferred alternative and the “no-go” alternative, is required during the assessment. What would, however, be required in this instance is that proof of the investigation undertaken and motivation indicating that no reasonable or feasible alternatives other than the preferred and the “no-go” alternatives exist.</p>	<p>2.6. Noted, please refer to section H of the Pre-Application DBAR.</p>	
		<p>2.7. Public Participation 2.7.1. In light of this Departments circular issued on 30 September 2020 (Circular No. 0024/2020), a Public Participation Plan must be submitted and agreed to by this Directorate prior to the commencement of any public participation process in order to ensure that reasonable notice is given to potential and registered interested and affected parties (“I&APs”) and must contain, all the public participation steps including additional measures proposed.</p> <p>2.7.2. 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.</p>	<p>2.7. Noted. A Public Participation Plan was submitted to the DEA&DP on the 27th May 2021 (please refer to Appendix F3.13).</p> <p>2.7.2. Noted, please see response above.</p> <p>2.7.3. Noted, please refer to Appendix F3.</p>	

		<p>2.7.3. You are advised that the list of interested and affected parties or the list of State departments/ organs of State to be consulted must include the South African Defence Force and the Civil Aviation Authority.</p>		
		<p>2.8. Environmental Management Programme (“EMPr”) 2.8.1. In accordance with Section 24N of the NEMA and Regulation 19 of the NEMA EIA Regulations, 2014 (as amended), the Department hereby requires the submission of an EMPr. The contents of such an EMPr must meet the requirements outlined in Section 24N (2) & (3) of the NEMA (as amended) and Appendix 4 of the NEMA EIA Regulations, 2014 (as amended). The EMPr must address the potential environmental impacts of the activity throughout the project life cycle including an auditing protocol for the assessment of the effectiveness of monitoring and management arrangements after implementation. The EMPr must be submitted together with the BAR.</p>	<p>2.8. Noted. Please refer to Appendix H.</p>	
		<p>2.9. Need and Desirability 2.9.1. In terms of the NEMA EIA Regulations, 2014 (as amended), when considering an application, this Directorate must take into account a number of specific considerations including, inter alia, the need for and desirability of any proposed development. As such, the need for and desirability of the proposed activity must be considered and reported on in the BAR. The BAR must reflect how the strategic context of the site in relation to the broader surrounding area, has been considered in addressing need and desirability.</p>	<p>2.9. Noted. Please refer to Section E of the Pre-Application DBAR.</p>	
		<p>3. General</p> <p>3.1. In addition to the above requirements, you must clearly show how the proposed development complies with the principles contained in Section 2 of the NEMA and must also show how the proposed development meets the requirements of sustainable development.</p> <p>3.2. You are hereby advised that the BAR must contain all the information outlined in Appendix 1 of the NEMA EIA Regulations, 2014 (as amended), and must also include the information requested in this letter. Omission of any of the said information may result in the refusal of Environmental Authorisation.</p>	<p>3.1. Noted.</p> <p>3.2. Noted.</p>	
		<p>4. Please note that the pre-application consultation is an advisory process and does not pre-empt the outcome of any future application which may be submitted to the Department. No information provided, views expressed and/or comments made by officials during the pre-application consultation should in any way be seen as an indication or confirmation:</p> <ul style="list-style-type: none"> • that additional information or documents will not be requested; or • of the outcome of the application. 	<p>4. Noted. Please note that a Pre-Application meeting was held on the 27th May 2021.</p>	
		<p>5. Please note that the activity may not commence prior to obtaining an environmental authorisation from the competent authority. It is an offence in terms of Section 49A of the NEMA for a person to commence with a listed activity unless the Department 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 the Environmental Compliance and Enforcement Directorate of this Department. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.</p>	<p>5. Noted.</p>	
		<p>6. Kindly quote the above-mentioned reference number in any future correspondence in respect of the pre-application.</p>	<p>6. Noted.</p>	

		This Department reserves the right to revise or withdraw comments or request further information based on any information received.	Thank you for providing comment on the NOI. The Pre-Application DBAR will be submitted in due course.	
COMMENTS ON SSV REPORT AND PUBLIC PARTICIPATION PLAN				
07/06/2021	DEADP: Directorate: Development Management (Region 1) (Ms. Naadiya Wookey / Naadiya.Wookey@westerncape.gov.za)	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Thank you for providing comment on the revised Site Sensitivity Verification (SSV) Report and Public Participation Plan.</p> <p>Noted with thanks.</p> <p>3.1.1. It is noted that no further assessment is required for the Agricultural Theme.</p> <p>3.1.2. It is noted that no further assessment is required for the Animal Species Theme.</p> <p>3.1.3. It is noted that no further assessment is required for the Aquatic Biodiversity Species Theme.</p>	EnviroAfrica

		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>3.1.4. Noted. The following comment was received by the HWC, "<i>You are hereby notified that, since there is no reason to believe that the proposed 35m telecommunications Mast on Ptn 22 of Farm 22 Zouterivier will impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required</i>". Please refer to Appendices E1.1 – E1.2.</p> <p>3.1.5. Noted.</p> <p>3.1.6. It is noted that no further assessment is required for the Defence Theme.</p> <p>3.1.7. Noted. The following comment was received by the HWC, "<i>You are hereby notified that, since there is no reason to believe that the proposed 35m telecommunications Mast on Ptn 22 of Farm 22 Zouterivier will impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required</i>". Please refer to Appendices E1.1 – E1.2.</p> <p>3.1.8. It is noted that no further assessment is required for the Plant Species Theme.</p> <p>3.1.9. It is noted that no further assessment is required for the Terrestrial Biodiversity Theme.</p>	
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		<p>3.4. Public Participation</p> <p>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):</p> <p>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;</p> <p>3.4.1.2. Existing community structures should be used, as far as practically possible, for communication required in terms of this project; and</p> <p>3.4.1.3. The use of zero data portals should be made available, if required.</p> <p>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.</p> <p>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.</p>	<p>3.4.1. It is noted that the DEA&DP agrees with the submitted Public Participation Plan;</p> <p>3.4.1.1. Noted.</p> <p>3.4.1.2. Noted.</p> <p>3.4.1.3. Noted.</p> <p>3.4.2. Noted. Should the size of the Reports be too large to send via email, a "WeTransfer" link will be provided whereby the relevant Report and Appendices can be downloaded from. The Report and Appendices will also be available for download from our website.</p> <p>3.4.3. Noted.</p>	
		<p>4. Please note that the activity may not commence prior to obtaining an environmental authorisation from the competent authority.</p> <p>5. Kindly quote the above-mentioned reference number in any future correspondence in respect of the pre-application.</p> <p>This Department reserves the right to revise or withdraw comments or request further information based on any information received.</p>	<p>4. Noted.</p> <p>5. Noted.</p> <p>Noted. We thank you for providing comment on the SSV Report and PP Plan. The Pre-Application Draft BAR will be submitted in due course.</p>	