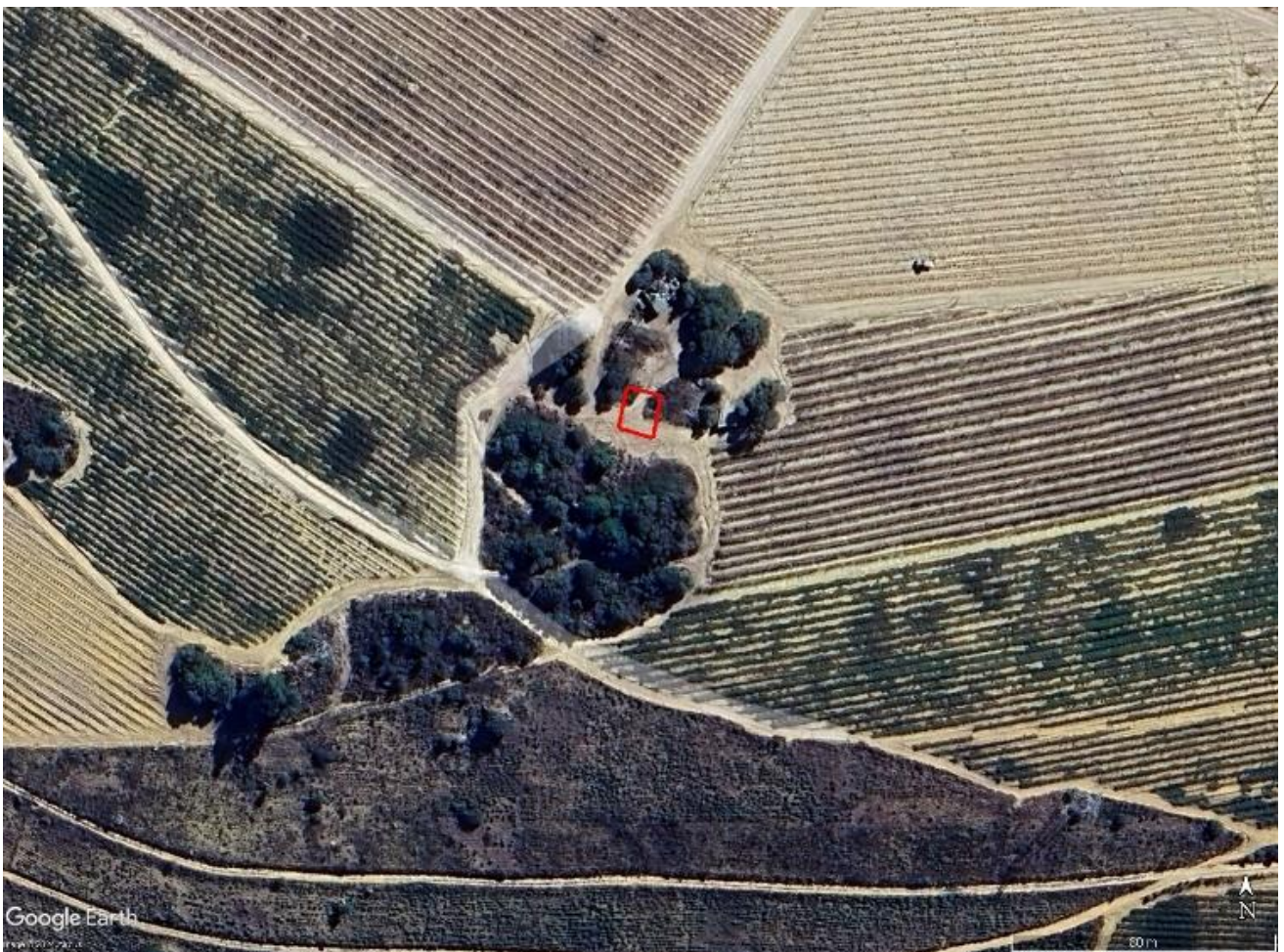


# DRAFT BAR FOR THE PROPOSED DEVELOPMENT OF THE 25 M HIGH DIEMERSFONTEIN TELECOMMUNICATION MAST ON PORTION 0 OF THE FARM NO. 1756, PAARL ROAD, DRAKENSTEIN MUNICIPALITY, WESTERN CAPE

DEADP Ref. No.: 16/3/3/6/7/1/B3/28/1482/24



**DRAFT** BASIC ASSESSMENT REPORT

NOVEMBER 2024

**DRAFT BAR FOR THE PROPOSED DEVELOPMENT OF  
THE 25 M HIGH DIEMERSFONTEIN  
TELECOMMUNICATION MAST ON PORTION 0 OF THE  
FARM NO. 1756, PAARL ROAD, DRAKENSTEIN  
MUNICIPALITY, WESTERN CAPE**

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**PREPARED FOR:**

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**Western Cape  
Government**

Department of Environmental Affairs and  
Development Planning

# **BASIC ASSESSMENT REPORT**

THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.

**APRIL 2024**




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## **BASIC ASSESSMENT REPORT**

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THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.**

**APRIL 2024**

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(For official use only)	
Pre-application Reference Number (if applicable):	
EIA Application Reference Number:	
NEAS Reference Number:	
Exemption Reference Number (if applicable):	
Date BAR received by Department:	
Date BAR received by Directorate:	
Date BAR received by Case Officer:	

### **GENERAL PROJECT DESCRIPTION**

(This must Include an overview of the project including the Farm name/Portion/Erf number)

Proposed Development of the 25 m high Diemersfontein telecommunication mast on Portion 0 of the Farm No. 1756, Paarl Road, Drakenstein Municipality, Western Cape.

## IMPORTANT INFORMATION TO BE READ PRIOR TO COMPLETING THIS BASIC ASSESSMENT REPORT

1. **The purpose** of this template is to provide a format for the Basic Assessment report as set out in Appendix 1 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) in order to ultimately obtain Environmental Authorisation.
2. The Environmental Impact Assessment ("EIA") Regulations is defined in terms of Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") hereinafter referred to as the "NEMA EIA Regulations".
3. *Submission of documentation, reports and other correspondence:*

The Department has adopted a digital format for corresponding with proponents/applicants or the general public. If there is a conflict between this approach and any provision in the legislation, then the provisions in the legislation prevail. If there is any uncertainty about the requirements or arrangements, the relevant Competent Authority must be consulted.

The Directorate: Development Management has created generic e-mail addresses for the respective Regions, to centralise their administration. Please make use of the relevant general administration e-mail address below when submitting documents:

**[DEADPEIAAdmin@westerncape.gov.za](mailto:DEADPEIAAdmin@westerncape.gov.za)**

Directorate: Development Management (Region 1):  
City of Cape Town; West Coast District Municipal area;  
Cape Winelands District Municipal area and Overberg District Municipal area.

**[DEADPEIAAdmin.George@westerncape.gov.za](mailto:DEADPEIAAdmin.George@westerncape.gov.za)**

Directorate: Development Management (Region 3):  
Garden Route District Municipal area and Central Karoo District Municipal area

General queries must be submitted via the general administration e-mail for EIA related queries. Where a case-officer of DEA&DP has been assigned, correspondence may be directed to such official and copied to the relevant general administration e-mail for record purposes.

All correspondence, comments, requests and decisions in terms of applications, will be issued to either the applicant/requester in a digital format via email, with digital signatures, and copied to the Environmental Assessment Practitioner ("EAP") (where applicable).

4. The required information must be typed within the spaces provided in this Basic Assessment Report ("BAR"). The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided.
5. All applicable sections of this BAR must be completed.
6. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority. If information is not submitted with this BAR due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.
7. This BAR is current as of **April 2024**. It is the responsibility of the Applicant/ EAP to ascertain whether subsequent versions of the BAR have been released by the Department. Visit this Department's website at <http://www.westerncape.gov.za> to check for the latest version of this BAR.
8. This BAR is the standard format, which must be used in all instances when preparing a BAR for Basic Assessment applications for an environmental authorisation in terms of the NEMA EIA Regulations when the Western Cape Government Department of Environmental Affairs and Development Planning ("DEA&DP") is the Competent Authority.

9. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this BAR must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department. Reasonable access to copies of this Report must be provided to the relevant Organs of State for consultation purposes, which may, if so indicated by the Department, include providing a printed copy to a specific Organ of State.
10. This BAR must be duly dated and originally signed by the Applicant, EAP (if applicable) and Specialist(s) and must be submitted to the Department at the details provided below.
11. The Department's latest Circulars pertaining to the "One Environmental Management System" and the EIA Regulations, any subsequent Circulars, and guidelines must be taken into account when completing this BAR.
12. Should a water use licence application be required in terms of the National Water Act, 1998 (Act No. 36 of 1998) ("NWA"), the "One Environmental System" is applicable, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the NWA. Refer to this Department's Circular EADP 0028/2014: One Environmental Management System.
13. Where Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA") is triggered, a copy of Heritage Western Cape's final comment must be attached to the BAR.
14. The Screening Tool developed by the National Department of Environmental Affairs must be used to generate a screening report. Please use the Screening Tool link <https://screening.environment.gov.za/screeningtool> to generate the Screening Tool Report. The screening tool report must be attached to this BAR.
15. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ('NEM:AQA"), the submission of the Report must also be made as follows, for-  
Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

Atmospheric Emissions Licence Applications, this report must also be (i.e., another hard copy and electronic copy) submitted for the attention of the Licensing Authority or this Department's Air Quality Management Directorate (Tel: 021 483 2888 and Fax: 021 483 4368) at the same postal address as the Cape Town Office.

## DEPARTMENTAL DETAILS

<b>CAPE TOWN OFFICE:</b> <b>DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 1)</b> (City of Cape Town, West Coast District, Cape Winelands District & Overberg District)	<b>GEORGE REGIONAL OFFICE:</b> <b>DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 3)</b> (Central Karoo District & Garden Route District)
<p>The completed Form must be sent via electronic mail to:  <a href="mailto:DEADPEIAAdmin@westerncape.gov.za">DEADPEIAAdmin@westerncape.gov.za</a></p> <p>Queries should be directed to the Directorate:                      Development Management (Region 1) at:                      E-mail: <a href="mailto:DEADPEIAAdmin@westerncape.gov.za">DEADPEIAAdmin@westerncape.gov.za</a>                      Tel: (021) 483-5829</p> <p>Western Cape Government                      Department of Environmental Affairs and Development                      Planning                      Attention: Directorate: Development Management (Region                      1)                      Private Bag X 9086                      Cape Town,                      8000</p>	<p>The completed Form must be sent via electronic mail to:  <a href="mailto:DEADPEIAAdmin.George@westerncape.gov.za">DEADPEIAAdmin.George@westerncape.gov.za</a></p> <p>Queries should be directed to the Directorate:                      Development Management (Region 3) at:                      E-mail: <a href="mailto:DEADPEIAAdmin.George@westerncape.gov.za">DEADPEIAAdmin.George@westerncape.gov.za</a>                      Tel: (044) 814-2006</p> <p>Western Cape Government                      Department of Environmental Affairs and Development                      Planning                      Attention: Directorate: Development Management                      (Region 3)                      Private Bag X 6509                      George,                      6530</p>

### MAPS

<b>Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.</b>	
Locality Map:	<p>The scale of the locality map must be at least 1:50 000.                      For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map.                      The map must indicate the following:</p> <ul style="list-style-type: none"> <li>• an accurate indication of the project site position as well as the positions of the alternative sites, if any;</li> <li>• road names or numbers of all the major roads as well as the roads that provide access to the site(s)</li> <li>• a north arrow;</li> <li>• a legend; and</li> <li>• a linear scale.</li> </ul> <p>For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken.</p> <p>Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.</p>
<b>Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.</b>	
Site Plan:	<p>Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following:</p> <ul style="list-style-type: none"> <li>• The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale.</li> <li>• The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan.</li> <li>• On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided.</li> <li>• The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan.</li> <li>• The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan.</li> <li>• Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development <b>must</b> be clearly indicated on the site plan.</li> <li>• Servitudes and an indication of the purpose of each servitude must be indicated on the site plan.</li> <li>• Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to):                         <ul style="list-style-type: none"> <li>○ Watercourses / Rivers / Wetlands</li> <li>○ Flood lines (i.e., 1:100 year, 1:50 year and 1:10 year where applicable);</li> <li>○ Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&amp;DP");</li> <li>○ Ridges;</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ Cultural and historical features/landscapes;</li> <li>○ Areas with indigenous vegetation (even if degraded or infested with alien species).</li> <li>● Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted.</li> <li>● North arrow</li> </ul> <p>A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.</p>
Site photographs	Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as <b>Appendix C</b> . The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.
Biodiversity Overlay Map:	A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as <b>Appendix D</b> .
Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as <b>Appendix A3</b> .

## ACRONYMS

DAFF:	Department of Forestry and Fisheries
DEA:	Department of Environmental Affairs
DEA& DP:	Department of Environmental Affairs and Development Planning
DHS:	Department of Human Settlement
DoA:	Department of Agriculture
DoH:	Department of Health
DWS:	Department of Water and Sanitation
EMPr:	Environmental Management Programme
HWC:	Heritage Western Cape
NFEPA:	National Freshwater Ecosystem Protection Assessment
NSBA:	National Spatial Biodiversity Assessment
TOR:	Terms of Reference
WCBSP:	Western Cape Biodiversity Spatial Plan
WCG:	Western Cape Government



## ATTACHMENTS

**Note:** The Appendices must be attached to the BAR as per the list below. Please use a ✓ (tick) or a x (cross) to indicate whether the Appendix is attached to the BAR.

The following checklist of attachments must be completed.

APPENDIX			✓ (Tick) or x (cross)
Appendix A:	Maps		
	Appendix A1:	Locality Map	✓
	Appendix A2:	Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning	x
	Appendix A3:	Map with the GPS co-ordinates for linear activities	x
Appendix B:	Appendix B1:	Site development plan(s)	✓
	Appendix B2	A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;	x
Appendix C:	Photographs		✓
Appendix D:	Biodiversity overlay map		✓
Appendix E:	Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.		
	Appendix E1:	Final comment/ROD from HWC	✓
	Appendix E2:	Copy of comment from Cape Nature	✓
	Appendix E3:	Final Comment from the DWS	x
	Appendix E4:	Comment from the DEA: Oceans and Coast	x
	Appendix E5:	Comment from the DAFF	x
	Appendix E6:	Comment from WCG: Transport and Public Works	x
	Appendix E7:	Comment from WCG: DoA	x
	Appendix E8:	Comment from WCG: DHS	x
	Appendix E9:	Comment from WCG: DoH	x

	Appendix E10:	Comment from DEA&DP: Pollution Management	x
	Appendix E11:	Comment from DEA&DP: Waste Management	x
	Appendix E12:	Comment from DEA&DP: Biodiversity	x
	Appendix E13:	Comment from DEA&DP: Air Quality	x
	Appendix E14:	Comment from DEA&DP: Coastal Management	x
	Appendix E15:	Comment from the local authority	x
	Appendix E16:	Confirmation of all services (water, electricity, sewage, solid waste management)	x
	Appendix E17:	Comment from the District Municipality	x
	Appendix E18:	Copy of an exemption notice	x
	Appendix E19	Pre-approval for the reclamation of land	x
	Appendix E20:	Proof of agreement/TOR of the specialist studies conducted.	Included in specialist reports (Appendix G)
	Appendix E21:	Proof of land use rights	x
	Appendix E22:	Proof of public participation agreement for linear activities	x
Appendix F:	Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.		✓
Appendix G:	Specialist Report(s)		✓
Appendix H:	EMPr		✓
Appendix I:	I1: Screening tool report I2: Site Sensitivity Verification Report		✓
Appendix J:	The impact and risk assessment for each alternative		✓
Appendix K:	Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline		Detailed in report (Section E)
Appendix L:	Department of Health – Health effects from cellular base stations SAHPRA – Letter on Health effect on Masts		✓

## SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	<b>CAPE TOWN OFFICE: REGION 1</b>	
		<b>(Cape Winelands District &amp; Overberg District)</b>
<b>Duplicate this section where there is more than one Proponent</b> Name of Applicant/Proponent: Name of contact person for Applicant/Proponent (if other): Company/ Trading name/State Department/Organ of State: Company Registration Number: Postal address: Telephone: E-mail:	Mast Services (Pty) Ltd	
	Sherika Sheobalak on behalf of Sheobalak Engineering (Pty) Ltd	
	Mast Services (Pty) Ltd	
	2022/620785/07	
	Knightsbridge Office Park, 33 Sloane Street, Bryanston, Sandton	
		Postal code: 2191
		Cell: 082 663 8787
Company of EAP: EAP name: Postal address: Telephone: E-mail: Qualifications: EAP registration no:	EnviroAfrica cc	
	Clinton Geysler (Reviewer and Supervisor) Zandria Jordaan (Compiler)	
	P. O. Box 5367, Helderberg	
		Postal code: 7446
<b>Duplicate this section where there is more than one landowner</b> Name of landowner: Name of contact person for landowner (if other): Postal address: Telephone: E-mail:	Du Plessis Trust	
	Jan Louw Du Plessis	
	Uitkyk Farm, Bo Dal Rd, Wellington	
		Postal code: 7654
		Cell: 082 802 0022
Name of Person in control of the land: Name of contact person for person in control of the land: Postal address: Telephone: E-mail:	Jan Louw Du Plessis	
	Uitkyk Farm, Bo Dal Rd, Wellington	
		Postal code: 7654
		Cell: 082 802 0022
<b>Duplicate this section where there is more than one Municipal Jurisdiction</b> Municipality in whose area of jurisdiction the proposed activity will fall: Contact person: Postal address: Telephone: E-mail:	Drakenstein Local Municipality	
	Louis Pienaar (Executive Director: Engineering)	
	PO Box 1, Paarl	
		Postal code: 7654

## SECTION B: CONFIRMATION OF SPECIFIC PROJECT DETAILS AS INCLUDED IN THE APPLICATION FORM

1.	Is the proposed development (please tick):	New	✓	
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.			
Greenfield. The proposed development is located on Portion 0 of Farm No. 1756, approximately 2.5 km southeast of Wellington. The farm is zoned as Agriculture and there are agricultural activities taking place on the site. The farm is located outside the urban area.				
3.	<b>For Linear activities or developments</b>			
3.1.	Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:			
N/A				
3.2.	Development footprint of the proposed development for all alternatives.			m <sup>2</sup>
N/A				
3.3.	Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.			
N/A				
3.4.	Indicate how access to the proposed routes will be obtained for all alternatives.			
N/A				
3.5.	SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives			
3.6.	<b>Starting point co-ordinates for all alternatives</b>			
	Latitude (S)	°	'	“
	Longitude (E)	°	'	“
	<b>Middle point co-ordinates for all alternatives</b>			
	Latitude (S)	°	'	“
	Longitude (E)	°	'	“
	<b>End point co-ordinates for all alternatives</b>			
	Latitude (S)	°	'	“
	Longitude (E)	°	'	“
<b>Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.</b>				
4.	<b>Other developments</b>			
4.1.	Property size(s) of all proposed site(s):			740 000 m <sup>2</sup>
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):			~4 602 m <sup>2</sup>
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:			106 m <sup>2</sup>
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).			
The proposed development includes the construction of a telecommunication mast and associated infrastructure. The proposed base station will have total developmental size of approximately 106m <sup>2</sup> and will include a 25 m high Lattice Mast. The site will be enclosed by fencing for security reasons.				
The 25 m high Lattice Mast will comprise of a lightning spike, aviation lights, a platform, M3 DB with LED site light on pole (Appendix B1).				
4.5.	Indicate how access to the proposed site(s) will be obtained for all alternatives.			
Existing roads and farm roads will be used.				
The site can be accessed as follow: Drive north towards Wellington on Jan van Riebeeck Drive, turn right on Bo Dal Drive. Take the second left on a gravel road and continue until Imbuko Wines is to your northeast. Turn left on the gravel road and continue up the hill for about 750 m, turn right and follow the farm road to the proposed site at the following coordinates: 33°40'11.60"S; 19° 1'17.30"E.				

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	5	5	0	0	0	0	0	0	0	0	0	1	7	5	6	0	0	0	0	0
4.7.	Coordinates of the proposed site(s) for all alternatives:																						
	Latitude (S)								33°				40'				11.60"						
	Longitude (E)								19°				1'				17.30"						

## SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOLS

### 1. Exemption applied for in terms of the NEMA and the NEMA EIA Regulations

Has exemption been applied for in terms of the NEMA and the NEMA EIA Regulations. If yes, include a copy of the exemption notice in Appendix E18.		NO
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### 2. Is the following legislation applicable to the proposed activity or development.

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). If yes, attach a copy of the comment from the relevant competent authority as Appendix E4 and the pre-approval for the reclamation of land as Appendix E19.		NO
The National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as Appendix E1.	YES	
The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DWS as Appendix E3.		NO
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.		NO
The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM:WA")		NO
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").		NO
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").		NO
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5.		NO

### 3. Other legislation

List any other legislation that is applicable to the proposed activity or development.
N/A

### 4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.
<p>DDFE Screening Tool and the Drakenstein Municipality Telecommunications Infrastructure Policy (dated March 2020)<sup>1</sup> was also considered. This policy covers several key policy areas and requirements:</p> <ul style="list-style-type: none"> <li>• <b>Statutory Compliance:</b> The policy is structured to comply with national and local laws, such as the Electronic Communications Act (2005), National Environmental Management Act (1998), and Drakenstein's Municipal Land Use Planning By-law (2018). These frameworks ensure that any telecommunication infrastructure development abides by overarching environmental, zoning, and communication regulations</li> <li>• <b>Locational Criteria and Visual Impact Mitigation:</b> To protect the visual integrity of Drakenstein, the policy encourages placing infrastructure where it will have the least visual impact, like industrial zones or areas with natural backdrops. Rooftop installations are preferred on taller buildings to minimize visibility, and measures like landscaping and architectural blending are recommended to further reduce visual disruptions</li> <li>• <b>Public and Stakeholder Participation:</b> Public input is required depending on the zoning scheme's designation for the infrastructure, ensuring transparency and community involvement. Circulation to the Planning Portfolio Holder and Ward Councillor for input is part of the process. Initial Public Participation took place from 04 September to 08 October 2024 to ensure all relevant interested and affected parties were informed of the proposed development</li> <li>• <b>Health and Safety:</b> The policy addresses health concerns, aligning with the National Department of Health's guidelines on electromagnetic energy emissions, ensuring infrastructure does not pose an unsubstantiated health risk to the community. Please refer to Appendix L regarding health risks and telecommunication masts</li> <li>• <b>Sustainability and Decommissioning:</b> There are strict provisions for the decommissioning and rehabilitation of telecommunication sites to ensure long-term environmental sustainability. Financial provisions for decommissioning may be required from the developer upfront. In this case, it is not foreseen that the proposed development will be decommissioned within the next 20+ years</li> </ul> <p>In summary, the proposed activity complies with Drakenstein Municipality's requirements by addressing statutory frameworks, visual and environmental impacts, public participation, health and safety, and sustainability measures.</p>

<sup>1</sup>[https://www.drakenstein.gov.za/sites/dw/DocumentLibrary/Drakenstein%20Municipality%20Telecommunication%20Infrastructure%20Policy%20\(FINAL\)\\_20200526.pdf](https://www.drakenstein.gov.za/sites/dw/DocumentLibrary/Drakenstein%20Municipality%20Telecommunication%20Infrastructure%20Policy%20(FINAL)_20200526.pdf)

## 5. Guidelines

List the guidelines which have been considered relevant to the proposed activity or development and explain how they have influenced the development proposal.	
DEADP Guidelines	EIA Guideline and Information Document Series (2013) were consulted and adhered to when undertaking this Basic Assessment Report.
National Environmental Management Act (107 of 1998) (NEMA) and Environmental Impact Assessment (EIA) Regulations, 2017	Principles of environmental management, procedures to be followed and adhered to for a Basic Assessment process and Environmental Authorisation
Public Participation guideline in terms of NEMA (2017)	Although some overlap with the DEA&DP Guideline (2013), this guideline was consulted and adhered to with regards to considering the public participation process required for the proposed project.

## 6. Protocols

Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form
<p>The DFFE Screening Tool (Appendix I), as well as the nature of the proposed project (i.e. 25m high, lattice mast and associated infrastructure), identified the need for certain specialist studies. The following themes were identified and are applicable:</p> <p>Aquatic Biodiversity Theme (Very High Sensitivity) – The Freshwater Assessment (Appendix G3) confirms that the correct and realistic sensitivity should be “Low”, rather than “Very High” as per the screening tool report.</p> <p>Archaeological and Cultural Heritage Theme (Very High Sensitivity) – The impact on heritage resources is expected to be very low due to the site being already disturbed (according to the NID submitted to HWC, Appendix G4).</p> <p>Civil Aviation Theme (High Sensitivity) – The applicant has lodged an application with CAA directly.</p> <p>Terrestrial Biodiversity (Very High Sensitivity) – The Terrestrial Biodiversity Assessment confirms that the sensitivity should be “Low” rather than “Very High” as per the Screening Tool Report (Appendix G2).</p> <p>In addition to the above, a visual specialist has been appointed to do an assessment (Appendix G5).</p>

## SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant <b>Basic Assessment Activity(ies)</b> as set out in <b>Listing Notice 1</b>	Describe the portion of the proposed development to which the applicable listed activity relates.
Activity No(s):	Provide the relevant <b>Basic Assessment Activity(ies)</b> as set out in <b>Listing Notice 3</b>	Describe the portion of the proposed development to which the applicable listed activity relates.
3.	<p>The development of masts or towers of any material or type used for telecommunication broadcasting or radio transmission purposes where the mast or tower—</p> <p>(a) is to be placed on a site not previously used for this purpose; and</p> <p>(b) will exceed 15 metres in height—</p> <p>but excluding attachments to existing buildings and masts on rooftops.</p> <p>i. Western Cape</p> <p>i. All areas outside urban areas;</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>The proposed development comprises of a 25m high telecommunication mast and associated infrastructure, located within an area zoned as Agriculture <u>and outside an Urban Area.</u></p>
<p><b>Note:</b></p> <ul style="list-style-type: none"> <li>The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted.</li> <li>Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.</li> </ul>		

List the applicable waste management listed activities in terms of the NEM:WA

Activity No(s):	Provide the relevant <b>Basic Assessment Activity(ies)</b> as set out in <b>Category A</b>	Describe the portion of the proposed development to which the applicable listed activity relates.

List the applicable listed activities in terms of the NEM:AQA

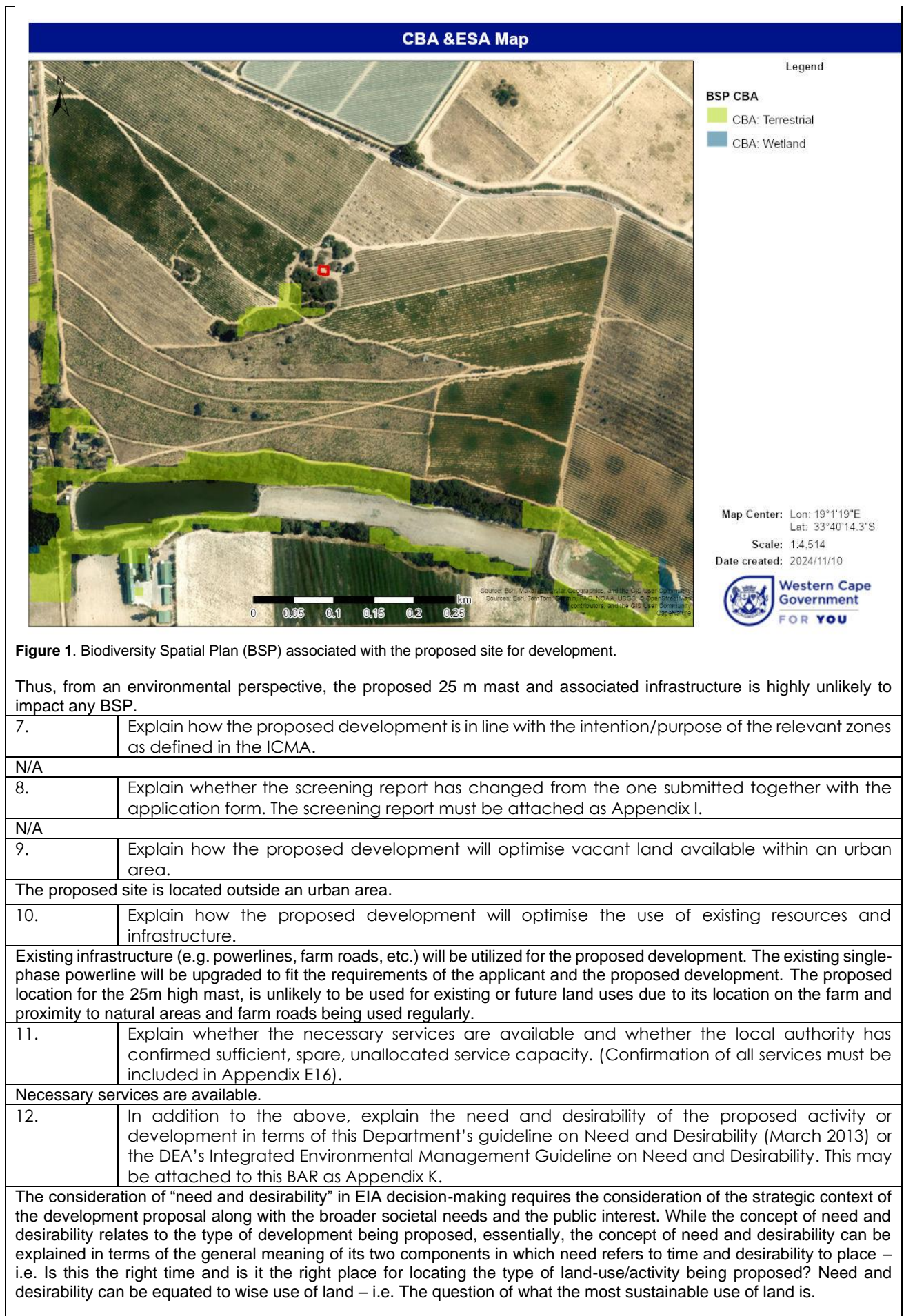
Activity No(s):	Provide the relevant <b>Listed Activity(ies)</b>	Describe the portion of the proposed development to which the applicable listed activity relates.



## SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.
The proposed project is for the development of a 25m high telecommunication mast and associated infrastructure on an already disturbed area of Portion 0 of Farm No. 1756, Paarl Road, Drakenstein Municipality, Western Cape. The farm is zoned as Agriculture and there are agricultural activities taking place on the site. The farm is located outside the urban area. The proposed base station will have a total development footprint of approximately 106 m <sup>2</sup> . The site will be enclosed by fencing for security reasons. The 25 m high Lattice Mast will comprise of a lightning spike, aviation lights, a platform, M3 DB with LED site light on pole (Appendix B1).	
2.	Explain how the proposed development is in line with the existing land use rights of the property as you have indicated in the NOI and application form? Include the proof of the existing land use rights granted in Appendix E21.
The proposed free-standing telecommunication mast falls within one of the consent uses in terms of the property's zoning, zoned as Agricultural.	
3.	Explain how potential conflict with respect to existing approvals for the proposed site (as indicated in the NOI/and or application form) and the proposed development have been resolved.
N/A	
4.	Explain how the proposed development will be in line with the following?
4.1	The Provincial Spatial Development Framework.
This application is for the construction of a telecommunications mast, which is considered as part of the essential services for the greater community.	
4.2	The Integrated Development Plan of the local municipality.
The proposed development aligns with the Drakenstein Municipality's 2024/2025 Integrated Development Plan (IDP) <sup>2</sup> by supporting infrastructure development and economic growth through improved digital connectivity, which enhances access to services for businesses and residents. This project contributes to reducing the digital divide, promotes equitable access to modern telecommunications, and fosters local economic opportunities. Additionally, the mast development aligns with the IDP's environmental sustainability goals by adhering to Environmental Impact Assessments (EIAs) and ensuring eco-friendly practices, while also upholding the IDP's emphasis on stakeholder participation through public consultation and transparent governance.	
4.3.	The Spatial Development Framework of the local municipality.
The proposed development aligns with the Drakenstein Municipality's Spatial Development Framework (SDF) <sup>3</sup> by promoting connectivity, which is a key spatial priority. The SDF emphasizes enhancing mobility and logistics corridors to support integrated growth and development. By improving digital infrastructure, the mast supports the SDF's vision of creating resilient, inclusive, and sustainable settlements. It also aligns with spatial themes such as promoting rural-urban linkages and reinforcing the hierarchy of settlements, as the mast will improve communication services across different regions. Furthermore, the project supports spatial efficiency by optimizing the use of existing infrastructure and resources, aligning with the SDF's goal of fostering sustainable land use and development.	
4.4.	The Environmental Management Framework applicable to the area.
The proposed development aligns with the Environmental Management Framework (EMF) applicable to the area by supporting sustainable development practices. The EMF focuses on promoting responsible land use that minimizes environmental impacts while enhancing socio-economic benefits. The development of the mast is required to undergo an Environmental Impact Assessment (EIA) to assess and mitigate potential environmental risks, such as visual impact, biodiversity loss, and effects on nearby agricultural land. Furthermore, the project must adhere to guidelines for preserving critical biodiversity areas and ensuring minimal disturbance to the natural environment, in line with the EMF's objectives of promoting environmental sustainability and resilience in the Drakenstein Municipality.	
5.	Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development.
No comments regarding biodiversity have been received from authorities to date. This will be addressed in the Final BAR submission. However, the Terrestrial Biodiversity Assessment (Appendix G2), confirms that the impact associated to terrestrial biodiversity are considered Low Sensitivity and not Very High as per the DFFE Screening Tool (Appendix I).	
6.	Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development.
As per the Western Cape Biodiversity Spatial Plan (BSP), the site is not located within a Critical Biodiversity Area (CBA) or Ecological Support Area (ESA) (Figure 1).	

<sup>2</sup>[https://www.drakenstein.gov.za/sites/dw/DocumentLibrary/1.%20IDP%202024-2025%20Final%20Drakenstein%20Municipality\\_V15.pdf](https://www.drakenstein.gov.za/sites/dw/DocumentLibrary/1.%20IDP%202024-2025%20Final%20Drakenstein%20Municipality_V15.pdf)  
<sup>3</sup>[https://www.drakenstein.gov.za/sites/dw/DocumentLibrary/Drakenstein%20Spatial%20Development%20Framework%20May2024\\_2024-2025\\_final.PDF](https://www.drakenstein.gov.za/sites/dw/DocumentLibrary/Drakenstein%20Spatial%20Development%20Framework%20May2024_2024-2025_final.PDF)



The proposed development meets a societal need by improving telecommunication infrastructure, which is vital for economic growth, social interaction, and safety. In areas like Drakenstein Municipality, where digital connectivity is increasingly important for both residential and business activities, the installation of the mast addresses the need for reliable communication services, reducing the digital divide and enhancing access to modern telecommunication networks.

The desirability of the mast stems from its alignment with local and regional development frameworks, such as the Spatial Development Framework (SDF) and Integrated Development Plan (IDP), which prioritize infrastructure development. The location and scale of the mast align with broader spatial planning goals, ensuring that the development enhances regional connectivity without compromising environmental sustainability. Additionally, it contributes to improved emergency services, education, and business operations by providing better access to communication technologies.

In conclusion, the mast fulfils a crucial need for improved communication infrastructure and is desirable in terms of supporting local development objectives while adhering to sustainability and environmental guidelines.

## SECTION F: PUBLIC PARTICIPATION

The Public Participation Process ("PPP") must fulfil the requirements as outlined in the NEMA EIA Regulations and must be attached as Appendix F. Please note that If the NEM: WA and/or the NEM: AQA is applicable to the proposed development, an advertisement must be placed in at least two newspapers.

1. Exclusively for linear activities: Indicate what PPP was agreed to by the competent authority. Include proof of this agreement in Appendix E22.

N/A

2. Confirm that the PPP as indicated in the application form has been complied with. All the PPP must be included in Appendix F.

A pre-application meeting with the DEA&DP was held on the 10th of October 2024.

Yes, it is confirmed that the PPP as indicated in the application form has been complied with (Table 1).

**Table 1.** Public Participation undertaken for the proposed development as per the Application Form.

(a)	fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of -		
(i)	the site where the activity to which the application relates is or is to be undertaken; and	YES	
(ii)	any alternative site.		
(b)	giving written notice, in any manner provided for in section 47D of the NEMA, to -		
(i)	the occupiers of the site and, if the applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	YES	
(ii)	owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;	YES	
(iii)	the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;	YES	
(iv)	the municipality (Local and District Municipality) which has jurisdiction in the area;	YES	
(v)	any organ of state having jurisdiction in respect of any aspect of the activity; and	YES	
(vi)	any other party as required by the competent authority;	N/A	
(c)	placing an advertisement in -		
(i)	one local newspaper; or	YES	
(ii)	any official <i>Gazette</i> that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;	N/A	
(d)	placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken.	N/A	
(e)	using reasonable alternative methods, as agreed to by the Department, in those instances where a person is desirous of but unable to participate in the process due to—	N/A	
	(i) illiteracy; (ii) disability; or (iii) any other disadvantage.		

3. Confirm which of the State Departments and Organs of State indicated in the Notice of Intent/application form were consulted with.

Heritage Western Cape
Department of Agriculture: Land Use Management
Cape Nature
Department of Water and Sanitation
Air Traffic and Navigation Services (ATNS)
Birdlife SA
Civil Aviation Authority (CAA)
Water Resource Management – Berg/Olifants
SARAO
Department of Environmental Affairs and Development Planning

4. If any of the State Departments and Organs of State were not consulted, indicate which and why.

N/A

5. if any of the State Departments and Organs of State did not respond, indicate which.

Comments raised on the Application phase BAR (i.e. this report), will be incorporated and addressed in the Final BAR Comments and Responses Report.

6. Provide a summary of the issues raised by I&APs and an indication of the manner in which the issues were incorporated into the development proposal.

Please refer to Appendix F2 for the Initial PPP Comments and Responses Report which contain comments raised by I&APs. Comments raised on initial public participation include, but are not limited to:

- Registration of I&APs
- Concerns about aesthetic impacts on views
- Health Risks
- Decrease in Property value
- Theft

Comments raised on the Application phase BAR (i.e. this report), will be incorporated and addressed in the Final BAR.

**Note:**

A register of all the I&AP's notified, including the Organs of State, and all the registered I&APs must be included in Appendix F. The register must be maintained and made available to any person requesting access to the register in writing.

The EAP must notify I&AP's that all information submitted by I&AP's becomes public information.

Your attention is drawn to Regulation 40 (3) of the NEMA EIA Regulations which states that "*Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but **must** be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority.*"

All the comments received from I&APs on the pre -application BAR (if applicable and the draft BAR must be recorded, responded to and included in the Comments and Responses Report and must be included in Appendix F.

All information obtained during the PPP (the minutes of any meetings held by the EAP with I&APs and other role players wherein the views of the participants are recorded) and must be included in Appendix F.

Please note that proof of the PPP conducted must be included in Appendix F. In terms of the required "proof" the following is required:

- a site map showing where the site notice was displayed, dated photographs showing the notice displayed on site and a copy of the text displayed on the notice;
- in terms of the written notices given, a copy of the written notice sent, as well as:
  - if registered mail was sent, a list of the registered mail sent (showing the registered mail number, the name of the person the mail was sent to, the address of the person and the date the registered mail was sent);
  - if normal mail was sent, a list of the mail sent (showing the name of the person the mail was sent to, the address of the person, the date the mail was sent, and the signature of the post office worker or the post office stamp indicating that the letter was sent);
  - if a facsimile was sent, a copy of the facsimile Report;
  - if an electronic mail was sent, a copy of the electronic mail sent; and
  - if a "mail drop" was done, a signed register of "mail drops" received (showing the name of the person the notice was handed to, the address of the person, the date, and the signature of the person); and
- a copy of the newspaper advertisement ("newspaper clipping") that was placed, indicating the name of the newspaper and date of publication (of such quality that the wording in the advertisement is legible).

## SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

### 1. Groundwater

1.1.	Was a specialist study conducted?	<b>YES</b>
1.2.	Provide the name and or company who conducted the specialist study.	
Dr. Dirk van Driel – Watsan Africa		
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.	
N/A		
1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.	

According to Cape Farm Mapper, the depth of the groundwater is 9.39 mbgl (Figure 2). However, based on the available information and according to the Freshwater Report (Appendix G3), there is no indication that groundwater depth has directly influenced the proposed development of the telecommunication mast. The site visit confirmed that no aquatic features, such as wetlands or streams, are present on the immediate site of the proposed mast. The groundwater in the broader region is part of a highly modified irrigation ecosystem, mainly used for large-scale agricultural purposes. The original aquatic ecosystems in the area have been heavily altered, with no significant connection between the proposed development site and any sensitive aquatic features or aquifers. The mast's foundation and construction activities are not expected to impact groundwater, as the land is already disturbed and no natural water bodies are present within the 32m controlled zone (Appendix G3).

Given the absence of watercourses on-site and the highly modified nature of surrounding aquatic systems, groundwater or aquifers are not expected to be a critical factor of the mast's development. The focus remains on ensuring that sediment transport is managed properly during construction to prevent erosion and runoff into any downstream aquatic habitats



Figure 2. Depth of Groundwater in the area.

## 2. Surface water

2.1.	Was a specialist study conducted?	YES	
2.2.	Provide the name and/or company who conducted the specialist study.		
Dr. Dirk van Driel – Watsan Africa			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		
The presence of nearby watercourses has been acknowledged, but the significant distance from the site (approximately 240 m south of the site), combined with the altered state of these aquatic features, means they have not majorly influenced the location or design of the telecommunication mast. However, erosion and sediment control during construction remain important considerations to avoid indirect impacts on downstream aquatic environments (Appendix G3).			

## 3. Coastal Environment

3.1.	Was a specialist study conducted?		NO
3.2.	Provide the name and/or company who conducted the specialist study.		
N/A			
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		
N/A			
3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.		
N/A			
3.5.	Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.		

## 4. Biodiversity

4.1.	Were specialist studies conducted?	YES	
4.2.	Provide the name and/or company who conducted the specialist studies.		
PJJ Botes – PB Consult Environmental Management Services			
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		
<p>Several systematic conservation planning tools and biodiversity informants have been used to assess the ecological sensitivity of the proposed development:</p> <ol style="list-style-type: none"> <li><b>Vegetation Maps (Mucina &amp; Rutherford, 2018):</b> According to the Biodiversity Assessment (Appendix G2), the South African vegetation map was referenced, identifying the area as historically supporting <b>Swartland Granite Renosterveld</b>, which is classified as <b>endangered</b>. While the broader region is highly sensitive, the proposed footprint is already disturbed, limiting direct impacts on this endangered vegetation (Appendix G2)</li> <li><b>Western Cape Biodiversity Spatial Plan (WCBSP) (2017):</b> The WCBSP identified <b>Critical Biodiversity Areas (CBA)</b> near the site, particularly on the southern portion of the koppie. However, the development will avoid these areas. The proposed mast site itself does not impact any CBA or <b>Ecological Support Areas (ESA)</b>.</li> <li><b>National Freshwater Ecosystem Priority Areas (NFEPA):</b> According to the Freshwater Report (Appendix G3), no watercourses or wetlands were identified directly within or near the site, meaning NFEPA considerations were minimal for this project. The nearest seasonal stream is 240 meters away, well beyond any buffer that would typically trigger significant freshwater concerns</li> <li><b>National List of Ecosystems That Are Threatened and in Need of Protection (2022):</b> The Swartland Granite Renosterveld, identified as endangered, falls under this list. The development footprint is small and already disturbed, ensuring no further loss of this vegetation type</li> </ol> <p>The overall influence of these informants was to ensure that the proposed development is located on an already disturbed area, minimizing the impact on critical ecosystems and avoiding biodiversity priority areas. Mitigation measures focus on <u>protecting sensitive vegetation nearby and preventing habitat loss.</u></p>			
4.4.	Explain how the objectives and management guidelines of the Biodiversity Spatial Plan have been used and how has this influenced your proposed development.		
The 2017 Western Cape Biodiversity Spatial Plan (WCBSP) includes a map of biodiversity importance for the entire province, covering both the terrestrial and freshwater realms, as well as major coastal and estuarine habitats. The WCBSP is the product of a systematic biodiversity plan that delineates, on a map, CBAs and ESAs, which require safeguarding to ensure the continued existence and functioning of species and ecosystems, including the delivery of ecosystem services. <u>As per the Western Cape Biodiversity Spatial Plan, the site is not located within a CBA or ESA (Figure 1).</u>			
4.5.	Explain what impact the proposed development will have on the site specific features and/or function of the Biodiversity Spatial Plan category and how has this influenced the proposed development.		
N/A. The proposed development will not impact any CBA or ESA (Figure 1).			
4.6.	If your proposed development is located in a protected area, explain how the proposed development is in line with the protected area management plan.		

N/A	
4.7.	Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.
<p>The primary influence of fauna considerations has been the inclusion of <b>protective measures</b> to ensure minimal disturbance during construction. Since the footprint is already degraded and does not support high-value fauna habitats, no major changes to the project design or location were necessary based on faunal presence.</p> <p>The presence of <b>low-sensitivity fauna</b> and the <b>transformed nature</b> of the site means that the development is unlikely to have any significant impact on local wildlife populations. Therefore, fauna considerations primarily focused on ensuring that the <b>remaining natural areas</b> surrounding the development are not further degraded and that indirect impacts are mitigated.</p>	

## 5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.	
<p>The proposed telecommunication mast will be located on an elevated rocky outcrop, which enhances signal distribution while minimizing visual impact. The stable granite geology allows for secure foundations with minimal excavation, though erosion risks due to the site's steep slopes require careful stormwater and erosion control during construction. Although the nearest watercourse is 240 meters away, mitigation measures will be in place to prevent sediment runoff affecting nearby agricultural land and watercourses.</p>	

## 6. Heritage Resources

6.1.	Was a specialist study conducted?		<b>NO</b>
6.2.	Provide the name and/or company who conducted the specialist study.	Jonathan Kaplan	
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.	<p>A NID has been submitted to the HWC (17 October 2024) whereby the specialist stated that the anticipated impacts on heritage resources will be very low and that a Heritage Impact Assessment will not be required for the proposed development.</p> <p>Final Comment from HWC received on 06 November 2024 (Appendix E1) with the following response:</p> <p><i>"HWC noted that the proposed telecommunications tower does not trigger Section 38 of the National Heritage Resources Act no. 25 (1999).</i></p> <p><i>Any further municipal procedures can be duly followed."</i></p>	

## 7. Historical and Cultural Aspects

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.	
<p>No archaeological and cultural heritage resources were observed during the site visit. A NID has been submitted to the HWC (17 October 2024) whereby the specialist stated that the anticipated impacts on heritage resources will be very low and that a Heritage Impact Assessment will not be required for the proposed development. It is therefore envisaged that the proposed development will have a negligible impact on the Archaeological and Cultural Heritage aspects.</p> <p>Final Comment from HWC received on 06 November 2024 (Appendix E1) with the following response:</p> <p><i>"HWC noted that the proposed telecommunications tower does not trigger Section 38 of the National Heritage Resources Act no. 25 (1999).</i></p> <p><i>Any further municipal procedures can be duly followed."</i></p>	

## 8. Socio/Economic Aspects

8.1.	Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.
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The area includes a mix of urban and rural settlements, with Paarl and Wellington being the primary urban centers. According to the Drakenstein SDP, key social and economic characteristics of the community include:

1. **Population:** The Drakenstein Municipality has a population of approximately 305,281 people, with diverse demographic groups. This population is spread across urban centers like Paarl and surrounding rural areas such as Windmeul and Simondium.
2. **Economic Activity:** The region has a strong agricultural base, particularly in fruit farming and wine production, which drives local employment. There is also an emerging industrial and commercial sector in the urban centers. The economy is characterized by agriculture, services, manufacturing, and tourism.
3. **Unemployment and Income Levels:** The unemployment rate in the municipality is lower than the national average, standing at around 21%. However, income disparities are notable, with a Gini coefficient of 0.6, indicating a relatively high level of inequality. Many households in rural areas rely on seasonal work in agriculture.
4. **Education and Services:** The region is well-served with educational institutions, including primary and secondary schools, and further education colleges. Access to basic services like water, sanitation, and electricity is high, although some informal settlements still face challenges.

Overall, the community near the proposed site reflects a blend of rural and urban livelihoods, with agriculture being a key economic activity. The development of the telecommunication mast is likely to support both social and economic growth by enhancing digital connectivity, which is critical for business, education, and access to services.

8.2. Explain the socio-economic value/contribution of the proposed development.

The proposed telecommunication mast will contribute to the socio-economic factors of the community by improving connectivity, fostering economic growth, creating jobs, enhancing access to services, and promoting social well-being. These benefits collectively support the broader development goals of the Drakenstein Municipality.

8.3. Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.

This application is for the construction of a telecommunications mast, which is considered essential for enhancing communication services within the greater Drakenstein community. In line with the Municipality's IDP which emphasizes the importance of improving access to infrastructure and services, this development will support local socio-economic growth by facilitating better connectivity for residents and businesses.

Furthermore, the development aligns with the SDF by promoting efficient resource use and sustainable growth. By improving telecommunication infrastructure, the mast will support local economic development and enhance public safety through better communication capabilities for emergency services. Overall, the proposed development will contribute positively to the community while having no negative impact on the IDP or SDF objectives.

8.4. Explain whether the proposed development will impact on people's health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development.

The proposed development is not expected to significantly impact people's health and well-being. According to the Department of Health's guidelines, the emissions from cellular base stations, such as those from the proposed mast, produce non-ionizing electromagnetic fields (EMF) that operate at very low exposure levels. Extensive research, including studies by the World Health Organization (WHO), has found no convincing scientific evidence linking the weak radiofrequency (RF) signals from telecommunication masts to adverse health effects. Therefore, the project is unlikely to pose a health risk to the public (Appendix L1).

In terms of **noise** and **odours**, the mast operates silently and produces no odours, ensuring minimal disruption to the community in these aspects.

For **visual character** and **sense of place**, Mast Services strive to ensure their stations are as inconspicuous as possible and harmonize with the surrounding environment. The proposed mast will be designed as a lattice mast to achieve this objective, as its open framework and light, airy appearance blend more seamlessly with the skyline than bulkier designs. Lattice masts offer a less imposing structure that reduces visual clutter and integrates well with natural and urban landscapes.

Although the installations must meet specific technical requirements to function effectively, including a minimum height, the lattice design minimizes the visual impact by appearing less solid and more transparent. This makes it the best aesthetic option, aligning with our commitment to balancing technical needs with the visual and environmental considerations of the communities we serve (Appendix F10).

According to the Visual Impact Assessment (VIA) Report (Appendix G5) the mast will be visible to some properties, but due to the distance and natural screening, the visual impact on these areas is rated as **low to medium-low**. The overall visual impact is **moderate - low** with no significant effect on heritage landscapes and "sense of place". The particular design of the mast, being a lattice structure, reduces its visual intrusion and the surround topography and vegetation help to minimize the visibility.

**SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES**

**1. Details of the alternatives identified and considered**

1.1.	Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred property and site alternative.	
The preferred alternative is located at 33°40'11.60"S; 19° 1'17.30"E (Appendix A1).	
Provide a description of any other property and site alternatives investigated.	
No alternative properties or site locations were investigated for the proposed telecommunication mast. The selected site is on an elevated location, allowing for optimal signal distribution across a wider region, which is essential for maximizing coverage. Additionally, this eliminates the need for multiple shorter towers, which would increase visual disruption. The chosen site also avoids interference with nearby agricultural activities, making it the most suitable location for the mast.	
Provide a motivation for the preferred property and site alternative including the outcome of the site selection matrix.	
The preferred property for the proposed telecommunication mast was selected based on a combination of technical, environmental, and operational criteria. The chosen site on an elevated hill offers the best signal distribution, covering a wider geographic area and reducing the need for multiple shorter towers, which would otherwise increase visual disruption and landscape clutter. This location ensures optimal network performance while minimizing environmental and visual impacts.	
Provide a full description of the process followed to reach the preferred alternative within the site.	
N/A	
Provide a detailed motivation if no property and site alternatives were considered.	
No alternative properties or site locations were investigated for the proposed telecommunication mast. The selected site is on an elevated location, allowing for optimal signal distribution across a wider region, which is essential for maximizing coverage. Additionally, this eliminates the need for multiple shorter towers, which would increase visual disruption. The chosen site also avoids interference with nearby agricultural activities, making it the most suitable location for the mast.	
List the positive and negative impacts that the property and site alternatives will have on the environment.	
<p><b>Positive Impacts of the Preferred Property and Site (Elevated Location):</b></p> <ol style="list-style-type: none"> <li><b>Optimal Signal Coverage:</b> The elevated location allows for broader and more efficient signal distribution, reducing the need for additional towers and minimizing cumulative environmental and visual impacts (Appendix G2 and G5).</li> <li><b>Limited Environmental Disturbance:</b> The proposed site is already disturbed, with minimal intact natural vegetation. This reduces the risk of significant environmental degradation, as the development footprint will avoid critical biodiversity areas (Appendix G2).</li> <li><b>No Impact on Watercourses:</b> The site is more than 32 meters away from any significant watercourses or wetlands, eliminating risks to aquatic ecosystems and preventing erosion into these areas (Appendix G3).</li> <li><b>Visual Integration:</b> The elevated location is naturally screened by the surrounding topography, helping to reduce the visual impact of the mast from various viewpoints, including nearby tourism and residential areas (Appendix G5).</li> <li><b>Co-location Potential:</b> The chosen site supports the co-location of additional telecommunications equipment, further minimizing the potential need for new infrastructure developments and reducing environmental impacts over time (Appendix G5)</li> </ol> <p><b>Negative Impacts of the Preferred Property and Site:</b></p> <ol style="list-style-type: none"> <li><b>Moderate Visual Impact:</b> Despite the natural screening, the mast will still be visible from certain key viewpoints, such as tourism facilities and residential areas. This could <b>potentially</b> alter the local sense of place (Appendix G5).</li> <li><b>Temporary Construction Disturbances:</b> Construction activities, such as noise, dust, and equipment transport, could cause temporary environmental disturbances. Farm roads may be affected by heavy vehicle use, potentially leading to erosion (Appendix G3 and G5)</li> <li><b>Limited Impact on Local Fauna:</b> While the area is not highly sensitive to fauna, construction activities could disrupt local bird and small mammal populations in the short term (Appendix G2).</li> </ol>	
1.2.	Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred activity alternative.	
No activity alternatives have been investigated as this application is for the development of a 25m high mast and associated infrastructure.	
Provide a description of any other activity alternatives investigated.	
No activity alternatives have been investigated as this application is for the development of a 25m high mast and associated infrastructure.	
Provide a motivation for the preferred activity alternative.	

No activity alternatives have been investigated as this application is for the development of a 25m high mast and associated infrastructure.

Provide a detailed motivation if no activity alternatives exist.

No activity alternatives have been investigated for this application because the proposed 25m high telecommunication mast and associated infrastructure is essential to meet the growing demand for reliable communication services in the region. According to the Drakenstein Municipality's IDP and SDF, enhancing connectivity is a key priority to support local economic growth, improve access to services, and reduce the digital divide.

The proposed telecommunication mast aligns directly with these objectives by providing essential infrastructure that will improve network coverage in the area, supporting the IDP's goal of modernizing infrastructure to meet the community's needs. The SDF emphasizes sustainable development and efficient land use, which this project supports by utilizing a single, well-placed mast on an elevated site to serve a broad area, rather than constructing multiple shorter towers, which would result in greater environmental and visual impacts.

Moreover, the mast is critical for ensuring access to digital services such as education, healthcare, and emergency response, which are integral to improving the quality of life for residents, as highlighted in the IDP. In this context, the development of the mast is the only viable option to achieve these socio-economic benefits, and no alternatives were considered because they would not fulfil the technical and service delivery needs that this project addresses. Therefore, the proposed activity is the most appropriate solution to meet the goals set out in both the IDP and SDF

List the positive and negative impacts that the activity alternatives will have on the environment.

No activity alternatives were investigated.

1.3. Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts

Provide a description of the preferred design or layout alternative.

Preferred alternative is the development of the telecommunication mast and associated infrastructure. The proposed base station will have total developmental size of approximately 106m<sup>2</sup> and will include a 25 m high Lattice Mast. The site will be enclosed by fencing for security reasons.

The 25 m high Lattice Mast will comprise of a lightning spike, aviation lights, a platform, M3 DB with LED site light on pole (Appendix B1).

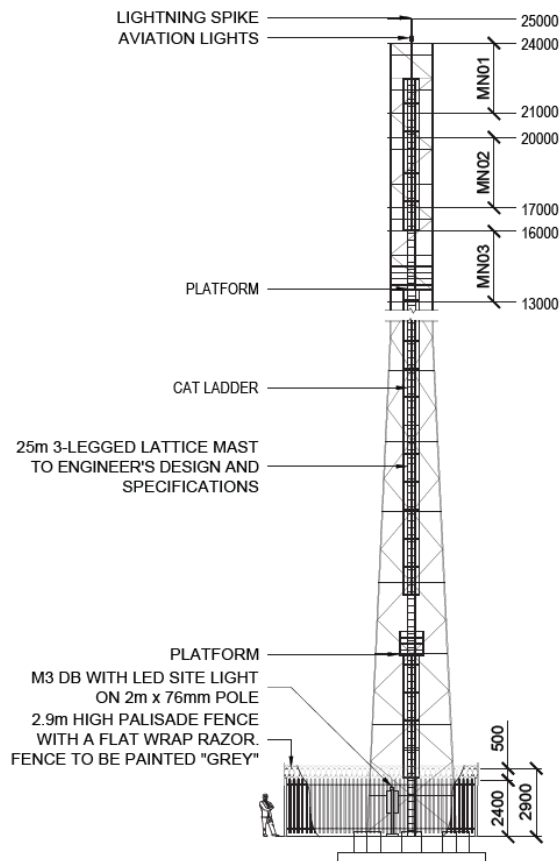


Figure 3. Preferred alternative: Lattice Mast Design (Appendix B1).

Provide a description of any other design or layout alternatives investigated.

No alternative designs were considered due to the lattice mast design being specifically chosen to minimize visual impact, as its open framework and light appearance blend more seamlessly with the skyline than bulkier structures. This design reduces visual clutter and integrates well with both natural and urban landscapes.	
Provide a motivation for the preferred design or layout alternative.	
The preferred design for the proposed mast is a lattice structure, which has been selected for several key reasons. This design effectively meets the technical requirements for optimal signal distribution while minimizing visual and environmental impact. The lattice structure's open framework and lightweight design allow it to blend more seamlessly with the surrounding landscape, reducing its visual prominence when compared to bulkier, solid mast designs.	
This design choice aligns with the Drakenstein Municipality's SDF which emphasizes the importance of minimizing visual clutter and preserving the natural character of the area. The lattice mast is less imposing and appears more transparent against the skyline.	
In terms of layout, the elevated location on a hill has been selected to maximize coverage and network efficiency. This strategic placement avoids the need for multiple shorter towers, which would have a greater cumulative environmental and visual impact. By consolidating the infrastructure in one optimal location, the proposed layout offers the best balance between technical performance, visual integration, and environmental responsibility	
Provide a detailed motivation if no design or layout alternatives exist.	
No alternative designs were considered due to the lattice mast design being specifically chosen to minimize visual impact, as its open framework and light appearance blend more seamlessly with the skyline than bulkier structures. This design reduces visual clutter and integrates well with both natural and urban landscapes.	
List the positive and negative impacts that the design alternatives will have on the environment.	
<p><b>Positive Impacts of the Preferred Lattice Mast Design:</b></p> <ol style="list-style-type: none"> <li><b>Minimal Visual Impact:</b> The lattice design's open framework allows it to blend with the surrounding environment, reducing its visibility and visual intrusion. The Visual Impact Assessment (VIA) indicates that the structure, despite being visible from certain viewpoints, will have a <b>moderate to low</b> visual impact due to natural screening by the topography and vegetation (Appendix G5).</li> <li><b>Optimized Connectivity:</b> The elevated location of the mast ensures optimal network coverage over a larger area, reducing the need for additional masts, which would otherwise increase environmental and visual impacts (Appendix G5).</li> <li><b>Co-location Opportunities:</b> The lattice design facilitates co-location, meaning other telecommunications providers can share the structure, minimizing the need for multiple installations and further reducing environmental disturbance (Appendix G2).</li> <li><b>Minimal Biodiversity Impact:</b> The proposed site is in a disturbed area with minimal intact natural vegetation. The biodiversity assessment concluded that the development would have a <b>low negative</b> impact on terrestrial biodiversity, especially with mitigation measures to protect indigenous trees (Appendix G2).</li> <li><b>No Impact on Watercourses:</b> According to the Freshwater Assessment Report, the site does not <b>contain or impact any aquatic features</b>, and the risk to nearby watercourses is <b>low</b> (Appendix G3).</li> </ol> <p><b>Negative Impacts of the Preferred Lattice Mast Design:</b></p> <ol style="list-style-type: none"> <li><b>Moderate Visual Impact in Certain Areas:</b> While the overall visual impact is <b>low</b>, the mast may be visible from certain key viewpoints, such as nearby tourism facilities and some residential estates, leading to a <b>potential</b> alteration in the sense of place (Appendix G5).</li> <li><b>Construction-Related Disturbance:</b> Temporary environmental disturbances, such as noise, dust, and erosion during the construction phase, may occur. The transport of heavy materials and equipment could affect farm roads, which need to be properly maintained during construction (Appendix G3).</li> <li><b>Limited Impact on Local Fauna:</b> Although the site has <b>low sensitivity</b> regarding animal species, the installation could disrupt local bird and butterfly populations during construction, albeit to a limited extent (Appendix G2).</li> </ol> <p>In summary, the lattice mast design offers the most balanced approach, minimizing both environmental and visual impacts while supporting optimal connectivity.</p>	
1.4.	Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred technology alternative:	
N/A. No technological alternatives were considered.	
Provide a description of any other technology alternatives investigated.	
N/A. No technological alternatives were considered.	
Provide a motivation for the preferred technology alternative.	
N/A. No technological alternatives were considered.	
Provide a detailed motivation if no alternatives exist.	
N/A. No technological alternatives were considered.	

List the positive and negative impacts that the technology alternatives will have on the environment.	
N/A	
1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred operational alternative.	
No operational alternatives were considered or are applicable.	
Provide a description of any other operational alternatives investigated.	
No operational alternatives were considered/investigated as the proposed project will be operated as a telecommunication mast.	
Provide a motivation for the preferred operational alternative.	
No operational alternatives were considered / investigated as the proposed project will be operated as a telecommunication mast.	
Provide a detailed motivation if no alternatives exist.	
No operational alternatives were considered / investigated as the proposed project will be operated as a telecommunication mast.	
List the positive and negative impacts that the operational alternatives will have on the environment.	
The proposed development is not expected to have any impacts during the operational phase.	
1.6.	The option of not implementing the activity (the 'No-Go' Option).
Provide an explanation as to why the 'No-Go' Option is not preferred.	
<p>The 'No-Go' option refers to not installing the proposed 25m telecommunication mast and its associated infrastructure. While this option would prevent any potential negative environmental impacts, it would also mean the loss of significant social and economic benefits that the development aims to provide. Improved telecommunication services, which are essential for both business operations and private/social communication, would not be achieved. This would hinder efforts to enhance connectivity in the region, a key priority outlined in the Drakenstein Municipality's IDP.</p> <p>The proposed activity is not expected to result in any significant negative environmental impacts, as the selected site is already disturbed. Moreover, the development is aligned with the SDF goals of promoting infrastructure development while minimizing environmental disruption. Without this mast, the community would not benefit from the enhanced network coverage needed for economic growth, emergency services, and access to essential services like healthcare and education.</p> <p>Therefore, the 'No-Go' option is not preferred, as it would prevent these critical improvements without offering significant environmental advantages.</p> <p>According to the Terrestrial Biodiversity Assessment (Appendix G2), the site is already degraded, and the current land use will continue. As a result, the No-Go alternative will not necessarily result in NO further impact. The site will still be used for agricultural related practices</p>	
1.7.	Provide an explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist.
N/A	
1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.
<p>The preferred alternative for the proposed development is the installation of the 25m high Diemersfontein telecommunication mast at the selected elevated site on Portion 0 of Farm No. 1756, Paarl Road, within the Drakenstein Municipality. This location is ideal due to its technical suitability for maximizing signal distribution across a broad area, supporting the municipality's goals of improving telecommunications infrastructure, as outlined in both the IDP and SDF.</p> <p>The preferred location minimizes environmental and visual impacts by utilizing a disturbed site with vegetation indicators and incorporating a lattice mast design that blends with the landscape. The elevated position reduces the need for additional shorter towers, which would otherwise clutter the landscape and increase visual disruption. Additionally, the location avoids interference with nearby agricultural activities, preserving local land use practices.</p> <p>The 'No-Go' alternative is not preferred, as it would prevent the community from gaining the significant social and economic benefits of improved connectivity, which are essential for business, education, healthcare, and emergency services. Given the minimal environmental impact of the development and the considerable social benefits, the preferred alternative is to proceed with the proposed telecommunication mast at the chosen location. This ensures alignment with the municipality's development priorities while enhancing the region's overall infrastructure and service delivery.</p>	

## 2. "No-Go" areas

Explain what "no-go" area(s) have been identified during identification of the alternatives and provide the co-ordinates of the "no-go" area(s).

The green & yellow area in Figure 4 (Figure 7 of the Terrestrial Biodiversity Assessment (Appendix G2)) are considered of botanical significance and should be protected and regarded as No-Go areas during the **construction phase**.



**Figure 4.** Sensitivity map: Google Earth Image showing the location of the sensitive areas (green & yellow). Derived from the Terrestrial Biodiversity Assessment (Appendix G2).

## 3. Methodology to determine the significance ratings of the potential environmental impacts and risks associated with the alternatives.

Describe the methodology to be used in determining and ranking the nature, significance, consequences, extent, duration of the potential environmental impacts and risks associated with the proposed activity or development and alternatives, the degree to which the impact or risk can be reversed and the degree to which the impact and risk may cause irreplaceable loss of resources.

Please refer to **Appendix J** for more information.

The following impact rating approach used by EnviroAfrica CC is a basic exponential rating system to assess actual and potential negative and positive environmental impacts.

Environmental activities or aspects are identified, based on:

- the phases of the project,
- the nature (or description) of the actual and potential impacts of the activities.

For every project activity or aspect, various environmental impacts are listed. Every negative impact is allocated a -value as per each of the following criteria:

- Probability (Likelihood)
- Extent
- Duration (Frequency)
- Consequence (Receiving Environment)
- Magnitude (Intensity/severity)

Every positive impact is allocated a +value as per each of the following criteria:

- Probability (Likelihood)
- Extent
- Duration (Frequency)
- Magnitude (Intensity/severity)

Once a value is allocated for each of the criterion, the scores are averaged to determine the final impact rating see Table 1 below.

EnviroAfrica then further assesses environmental significance, based on the nature of the impact, as per the score and colour key which forms part of Table 1 below. This results in impacts having either a low (indicated in green), medium (indicated in yellow) or high (indicated in orange and red) negative significance, and a low (light blue), medium (blue) or a high (dark blue) positive significance

**Table 2.** Environment Impact Significance criteria used to rank the significance of impacts associated with the proposed development.

<b>SIGNIFICANCE CRITERIA</b>	<b>Very High</b>	<b>High</b>	<b>Medium</b>	<b>Low</b>	<b>Negligible (very low)</b>
<b>Value</b>	<b>16</b>	<b>8</b>	<b>4</b>	<b>2</b>	<b>1</b>
<b>Probability (likelihood) (P)</b>		Definite. Impact will definitely occur (impact will occur regardless of any prevention measures)	Highly probable. Very likely for impact to occur.	Probable. Impact may likely occur.	Improbable. Low likelihood/unlikely for impact to occur.
<b>Extent (E)</b>	Impact potentially reaches beyond national boundaries	Impact has definite provincial/potential national consequences	Impact confined to regional area/ town	Impact confined to local region and impact on neighbouring properties	Impact confined to project property / site
<b>Duration (D)</b>		Permanent The impact is expected to have a permanent impact, with very little to no rehabilitation possible	Long-Term The impact is expected to last for a long time after construction with rehabilitation expected to be 15-50 years. Impact is reversible but only with long-term mitigation	Medium-term The impact is expected to last for some time after construction with rehabilitation expected to be 2 - 15 years. Impact is reversible but only with on-going mitigation	Short-term / temporary The impact is expected to be temporary or last for a relatively short time with rehabilitation expected to be <2years. The impact is reversible through natural process and/or some mitigation.
<b>Magnitude (Intensity/Severity) (M)</b>	It is expected that the activity will have a very severe to permanent impact on the surrounding environment. Functioning irreversibly impaired. Rehabilitation often impossible or unfeasible	It is expected that the activity will have a severe impact on the surrounding environment. Functioning may be severely impaired and may be temporarily cease. Rehabilitation will be needed to restore system integrity	It is expected that the activity will have an impact on the surrounding environment, but it will maintain its function, even if moderately modified (overall integrity not compromised). Rehabilitation easily achieved	It is expected that the activity will have a perceptible impact on the surrounding environment, but it will maintain its function, even if slightly modified (overall integrity not compromised). Rehabilitation easily achieved	It is expected that the impact will have little or no effect on the integrity of the surrounding environment
<b>Receiving environment (Consequence): (RE)</b>	Very sensitive, pristine area – protected site or species	Unused area containing only	Unused area containing indigenous	Semi-disturbed area already rehabilitated / recovered from	Disturbed area/ transformed/

	permanently or seasonally present	indigenous fauna / flora species	and alien fauna / flora species	prior impact, or with moderate alien vegetation	heavy alien vegetation
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**Environmental Significance Rating Methodology (Rating Criteria and Significance Key):**

**Negative Impacts**

SIGNIFICANCE	RATING	Final rating score / value range
Very Significant	Very High	-11 to -16
Significant	High	-7 to <-11
Increasing Significance	Medium	≥-5 to <-7
	Medium Low	-4 to ≤-5
Insignificant	Low	-3 to <-4
	Very Low	-1 to <-2

**Positive Impacts**

SIGNIFICANCE	RATING	Final rating score / value range
Significant	High	10 to 16
Increasing Significance	Medium	4 to <10
Insignificant	Low	1 to <4

**4. Assessment of each impact and risk identified for each alternative**

**Note:** The following table serves as a guide for summarising each alternative. The table should be repeated for each alternative to ensure a comparative assessment. The EAP may decide to include this section as Appendix J to this BAR.

Please refer to Appendix J for more information.

<b>Alternative:</b>	
<b>PLANNING, DESIGN AND DEVELOPMENT PHASE</b>	
<b>Potential impact and risk:</b>	
Nature of impact:	
Extent and duration of impact:	
Consequence of impact or risk:	
Probability of occurrence:	
Degree to which the impact may cause irreplaceable loss of resources:	
Degree to which the impact can be reversed:	
Indirect impacts:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be avoided:	
Degree to which the impact can be managed:	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Residual impacts:	



Cumulative impact post mitigation:	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	
<b>OPERATIONAL PHASE</b>	
<b>Potential impact and risk:</b>	
Nature of impact:	
Extent and duration of impact:	
Consequence of impact or risk:	
Probability of occurrence:	
Degree to which the impact may cause irreplaceable loss of resources:	
Degree to which the impact can be reversed:	
Indirect impacts:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be avoided:	
Degree to which the impact can be managed:	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Residual impacts:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	
<b>DECOMMISSIONING AND CLOSURE PHASE</b>	
<b>Potential impact and risk:</b>	
Nature of impact:	
Extent and duration of impact:	
Consequence of impact or risk:	
Probability of occurrence:	
Degree to which the impact may cause irreplaceable loss of resources:	
Degree to which the impact can be reversed:	
Indirect impacts:	
Cumulative impact prior to mitigation:	
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	
Degree to which the impact can be avoided:	
Degree to which the impact can be managed:	
Degree to which the impact can be mitigated:	
Proposed mitigation:	
Residual impacts:	
Cumulative impact post mitigation:	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	

## SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

1.	Provide a summary of the findings and impact management measures identified by all Specialist and an indication of how these findings and recommendations have influenced the proposed development.
<p><b>1. Agriculture Findings and Impact Management (Appendix G1):</b></p> <p><b>Findings:</b></p> <ul style="list-style-type: none"> <li>The site is located in a Protected Agricultural Area, designated to preserve high-potential land for food production. However, the land capability of the proposed site is classified as <b>low</b> due to shallow soils (Fa land type) and low terrain capability, making it unsuitable for intensive agriculture</li> <li>Climate capability is moderate to high, with sufficient rainfall and favourable temperatures for agricultural activities. However, the soil capability is moderate, and the land is considered not arable</li> <li>The grazing capacity of the site is extremely low (108 ha/LSU), indicating that the land is unsuitable for livestock farming</li> <li>The development site is currently characterized by shrubs and trees, with no active crop cultivation or significant land use changes over the past 9 years</li> </ul> <p><b>Impact Management Measures:</b></p> <ul style="list-style-type: none"> <li>Placement of Mast: The mast is placed between cultivated lands, minimizing any disruption to agricultural activities. This siting avoids productive land and is supported by the Agricultural Compliance Statement</li> <li>Soil Preservation: Given the site's low agricultural value, no significant management measures for soil preservation are necessary, although general construction measures to prevent erosion and manage soil disturbance should be followed</li> <li>Minimizing Land Use Fragmentation: The proposed development avoids fragmentation of agricultural activities, ensuring that farming operations in the surrounding areas are not affected</li> </ul> <p><b>Influence on Development:</b></p> <ul style="list-style-type: none"> <li>The agricultural findings support the development of the mast on the proposed site, as it has low potential for productive agriculture. The placement between cultivated areas avoids any direct conflict with agricultural activities, and the development will not result in the loss of valuable agricultural land. Consequently, the proposed telecommunication mast is considered acceptable from an agricultural perspective, and no major changes to the development plan were required based on these findings</li> </ul>	
<p><b>2. Terrestrial Biodiversity Assessment Findings and Impact Management (Appendix G2):</b></p> <p><b>Findings:</b></p> <ul style="list-style-type: none"> <li>The development site is in a disturbed area, surrounded by agricultural land, with limited natural vegetation. The site itself supports some patches of Swartland Granite Renosterveld, an endangered vegetation type, but the footprint of the mast avoids the most sensitive areas</li> <li>There are no CBAs or ESAs within the immediate development footprint, although they exist nearby. The potential impact on terrestrial biodiversity is considered <b>low</b> due to the degraded condition of the site.</li> <li>Protected indigenous trees, particularly old wild olive trees, must be preserved, while invasive species like Rooikrans should be removed</li> </ul> <p><b>Impact Management Measures:</b></p> <ul style="list-style-type: none"> <li><b>Vegetation Protection:</b> Implement measures to protect indigenous trees, especially large wild olive trees, from damage during construction. A "no-go" zone should be established around these trees</li> <li><b>Mitigation of Minor Biodiversity Impacts:</b> Ensure that construction activities remain confined to the designated disturbed area to avoid unnecessary damage to nearby natural vegetation</li> </ul> <p><b>Influence on Development:</b></p> <ul style="list-style-type: none"> <li>The findings have confirmed that the location is suitable, provided that indigenous trees are protected</li> </ul>	
<p><b>3. Freshwater Assessment Findings and Impact Management (Appendix G3):</b></p> <p><b>Findings:</b></p> <ul style="list-style-type: none"> <li>The proposed telecommunication mast site is more than 32 meters away from any significant watercourses, streams, or wetlands. The closest aquatic features (approximately 240 m from the proposed development), including nearby farm dams and engineered streams, are highly modified and not natural ecosystems</li> <li>There is no aquatic ecological connectivity between the mast site and any aquatic habitats, and the project is not expected to impact the surrounding freshwater systems</li> <li>The site's erodible soils present a minor risk of sediment runoff into nearby aquatic features during construction, especially during rainfall.</li> </ul> <p><b>Impact Management Measures:</b></p> <ul style="list-style-type: none"> <li><b>Stormwater Management:</b> Implement stormwater controls during construction, including berms and barriers, to prevent sediment from being transported downhill into aquatic systems.</li> <li><b>Erosion Control:</b> Limit land disturbance and confine construction to the dry summer months to reduce erosion risks. Repair any damage to access roads promptly to prevent further erosion.</li> </ul> <p><b>Influence on Development:</b></p> <ul style="list-style-type: none"> <li>The low sensitivity of aquatic biodiversity at the site supports the decision to proceed with the proposed mast, but with stormwater and erosion controls to minimize potential downstream impacts during construction.</li> </ul>	

#### 4. Visual Impact Assessment Findings and Impact Management (Appendix G5):

##### Findings:

- The visual impact of the proposed 25m lattice mast is assessed as **low to moderate**. The mast will be visible from certain key viewpoints, including nearby tourism facilities (e.g., Imbuko Wines) and residential estates, but natural screening from topography and vegetation mitigates much of the impact
- The mast is situated in an agricultural landscape where similar infrastructure (e.g., existing masts) is already present. The open, lattice design reduces its visual bulk and blends more with the environment compared to bulkier alternatives
- The cumulative visual impact is considered **low**, as there are no other masts within a close distance that would contribute significantly to visual clutter

##### Impact Management Measures:

- **Minimal Visual Intrusion:** The choice of a lattice mast with its open framework design minimizes its visual impact and allows it to blend better with the skyline
- **Site Selection:** The elevated site on a natural outcrop provides optimal signal coverage while reducing the need for additional masts, thus minimizing future visual impacts
- **No Mitigation Needed:** Given the overall low visual impact and the acceptability of such structures within the agricultural landscape, no additional mitigation measures are deemed necessary

##### Influence on Development:

- The visual assessment has confirmed that the proposed site and lattice mast design are appropriate for the landscape. The findings have reinforced the decision to proceed with this design, ensuring minimal visual disruption while maintaining signal efficiency.

2. List the impact management measures that were identified by all Specialist that will be included in the EMPr

Mitigation measures, incorporated in the Environmental Management Programme (EMPr) must be implemented should the proposed development be approved.

##### Terrestrial Biodiversity

The following measures should be implemented during the construction phase:

- A suitably qualified environmental control officer (ECO) should be appointed to oversee the construction phase, including laydown areas selection and waste- and wastewater management
- The green & yellow area in Figure 7 of the Terrestrial Biodiversity Assessment (Appendix G2) are considered of botanical significance and should be protected and regarded as No-Go areas during the construction phase
- The construction site must be demarcated (approved by the ECO) and all construction activities must remain within this demarcated area
- No additional impact must be allowed on the remaining indigenous vegetation (Refer to Figure 7 Terrestrial Biodiversity Assessment (Appendix G2))

##### Freshwater

The following mitigation measures should be implemented during the construction phase:

- When the foundations are made, no more land must be disturbed that is necessary, as loose sand and sediments will be washed downhill along the farm roads and will eventually end up in the downstream aquatic habitat. Deposition and infilling may further downgrade aquatic habitat even more than it already is
- The farm roads must be provided with berms and whatever stormwater management infrastructure is required to divert runoff from the roads. Sediment transport down the slope must be prevented as far as possible
- Construction must be concluded in the dry summer months
- Heavy heaving of several cubic metres of concrete up the steep incline is bound to happen. The access road is about to take punishment during this operation. The road must be kept in a good state of repair. It must be immediately repaired following damage done by heavy vehicles and earth-moving machinery. The access road must not be allowed to form even deeper trenches

##### Heritage

- The heritage specialist recommended that no Heritage Impact Assessment will be required as the potential impact on any heritage resources is very low
- Although unlikely, should any heritage resources be discovered/uncovered during the construction phase, construction activities must be immediately ceased. The ECO must be immediately notified and the relevant personnel at Heritage Western Cape (HWC) must be contacted to advise on the way forward

##### Visual

- These masts are usually grey in colour. Since it is less than 45m it does not need to be painted red and white in accordance with the CAA requirements. The grey colour range is acceptable and no further mitigation measures are required in this regard.
- In order to avoid potential lighting pollution is suggested that the security lights are directed downward.

3. List the specialist investigations and the impact management measures that will **not** be implemented and provide an explanation as to why these measures will not be implemented.

Please refer to Appendix I with regards to the DFFE Screening tool and Site Sensitivity Verification Report (SSVR).

4.	Explain how the proposed development will impact the surrounding communities.
The proposed development will provide various signal and connectivity enhancements in the immediate and surrounding areas, providing benefits which include, but are not limited to, security, improved medical response, socio-economic development, and access to education.	
5.	Explain how the risk of climate change may influence the proposed activity or development and how has the potential impacts of climate change been considered and addressed.
The development of the proposed telecommunication masts will promote the development of information and communication technology (ICT) <sup>4</sup> infrastructure which has been identified as being critically important in the contribution to climate-related responses and adaptive practices to climate change. Should the proposed development be authorised, various signal and connectivity enhancements in the immediate and surrounding areas will promote community members' access to information regarding climate change and appropriate mitigation measures.	
6.	Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved.
<p>Based on the available reports from the Freshwater, Biodiversity, Visual, and Agricultural specialists, there appear to be no conflicting recommendations. Each specialist assessed different environmental aspects, and their findings and recommendations align well to support the development of the proposed telecommunication mast:</p> <ul style="list-style-type: none"> <li>• <b>Agricultural Assessment:</b> The site has low agricultural potential, and recommendations focus on minimizing disturbance to agricultural activities, which do not conflict with the other specialists' recommendations (Appendix G1)</li> <li>• <b>Biodiversity Assessment:</b> The site is located in a disturbed area with low biodiversity sensitivity. Recommendations focus on protecting indigenous trees and removing invasive species, which align with the other assessments (Appendix G2)</li> <li>• <b>Freshwater Assessment:</b> No significant aquatic features are near the site, and erosion control measures are recommended to prevent runoff into watercourses (Appendix G3)</li> <li>• <b>Visual Impact Assessment:</b> The lattice mast design and the selected site help minimize visual intrusion, with no additional mitigation measures required, and there is no conflict with the other environmental recommendations (Appendix G5)</li> </ul>	
7.	Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development.
<p>The findings and recommendations from the various specialist studies have been integrated to inform an adequate set of mitigation measures that address the environmental and social impacts of the proposed telecommunication mast. These measures collectively ensure that the development proceeds in an environmentally responsible and sustainable manner.</p> <p>The integrated approach to mitigation takes into account the findings of all specialists, ensuring that the mast is positioned and constructed in a way that minimizes its environmental footprint. By addressing impacts on biodiversity, visual aesthetics, agricultural activities, and freshwater resources, the mitigation measures create a balanced plan that manages potential negative impacts while enhancing the social and economic benefits of improved telecommunications infrastructure. All of these measures are compiled into the EMPr (Appendix H) to guide the construction, operation, and post-construction (if applicable) phases of the development.</p>	
8.	Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.
<p>The <b>mitigation hierarchy</b> is a widely recognized approach in environmental management that prioritizes actions to prevent, minimize, restore, and offset (if applicable) environmental impacts in a structured way. This approach has been applied throughout the planning and design of the proposed telecommunication mast to ensure that the best practicable environmental option is selected.</p>	
<p><b>1. Avoidance (prevention):</b>  The first step in the mitigation hierarchy is to <b>avoid environmental impacts wherever possible</b>. In the case of the proposed development, the following avoidance measures were implemented:</p> <ul style="list-style-type: none"> <li>• <b>Site selection:</b> the chosen site is located in a <b>disturbed area with low agricultural and biodiversity value</b>, avoiding sensitive habitats such as CBAs and productive agricultural land. This decision was supported by the <b>agricultural and biodiversity assessments</b>, which confirmed that the site does not contain arable land or high-value vegetation (Appendix G1&amp;G2)</li> <li>• <b>Avoidance of watercourses:</b> the <b>freshwater specialist</b> identified that the mast location is more than 32 meters from any significant watercourses, effectively avoiding direct impacts on aquatic ecosystems (Appendix G3)</li> </ul> <p><b>2. Minimization:</b>  Where impacts cannot be entirely avoided, the next step is to <b>minimize the scale and intensity</b> of those impacts. Several minimization strategies have been applied:</p> <ul style="list-style-type: none"> <li>• <b>Lattice mast design:</b> the lattice mast design was selected to minimize <b>visual impact</b> by reducing the structure's visual bulk and allowing it to blend better with the landscape. This decision was supported by the <b>visual impact assessment</b> and was chosen over bulkier designs that would have had a greater visual and environmental footprint (Appendix G5)</li> </ul>	

<sup>4</sup>Fu, G., Horrocks, L. and Winne, S., 2016. Exploring impacts of climate change on UK's ICT infrastructure. *Infrastructure Asset Management*, 3(1), pp.42-52.

- **Construction footprint:** the construction activities will be limited to the **designated footprint** (106 m<sup>2</sup>), minimizing land disturbance and the impact on surrounding vegetation and soil. This measure was recommended by both the **biodiversity** and **agricultural specialists** to reduce habitat destruction and maintain agricultural productivity of the surrounding agricultural activities (Appendix G1&G2)
- **Erosion and stormwater management:** mitigation measures, such as **erosion control and stormwater management**, will be implemented during the construction phase to prevent soil erosion and sediment runoff, as recommended by the **freshwater specialist** (Appendix G3)

### **3. Restoration and rehabilitation:**

Where temporary impacts are unavoidable, the next step is to ensure that affected areas are **restored to their original condition**:

- **Post-construction rehabilitation:** any disturbed areas that are not part of the permanent infrastructure will be **rehabilitated** by replanting with indigenous vegetation, stabilizing soils, and removing construction debris. This was recommended by the **biodiversity** and **agricultural specialists** to restore ecosystem functions and minimize long-term environmental impacts (Appendix G2&G3)

### **4. Offsetting (compensation):**

In cases where impacts cannot be fully avoided, minimized, or restored, **offset measures** are considered to compensate for residual impacts. However, in this project, due to the low sensitivity of the site and the successful application of avoidance and minimization measures, **no significant offsets** were deemed necessary. The combination of avoidance, minimization, and rehabilitation measures sufficiently addresses the potential environmental impacts.

## SECTION J: GENERAL

### 1. Environmental Impact Statement

1.1.	Provide a summary of the key findings of the EIA.
<p><b>Agriculture Findings (Appendix G1):</b></p> <ul style="list-style-type: none"> <li>The site is located in a Protected Agricultural Area, designated to preserve high-potential land for food production. However, the land capability of the proposed site is classified as <b>low</b> due to shallow soils (Fa land type) and low terrain capability, making it unsuitable for intensive agriculture</li> <li>Climate capability is moderate to high, with sufficient rainfall and favourable temperatures for agricultural activities. However, the soil capability is moderate, and the land is considered not arable</li> <li>The grazing capacity of the site is extremely low (108 ha/LSU), indicating that the land is unsuitable for livestock farming</li> <li>The site is currently characterized by shrubs and trees, with no active crop cultivation or significant land use changes over the past 9 years</li> </ul> <p><b>Terrestrial Biodiversity Assessment Findings (Appendix G2):</b></p> <ul style="list-style-type: none"> <li>The development site is in a disturbed area, surrounded by agricultural land, with limited natural vegetation. The site itself supports some patches of Swartland Granite Renosterveld, an endangered vegetation type, but the footprint of the mast avoids the most sensitive areas</li> <li>There are no Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) within the immediate development footprint, although they exist nearby. The potential impact on terrestrial biodiversity is considered <b>low</b> due to the degraded condition of the site.</li> <li>Protected indigenous trees, particularly old wild olive trees, must be preserved, while invasive species like Rooikrans should be removed</li> </ul> <p><b>Freshwater Assessment Findings (Appendix G3):</b></p> <ul style="list-style-type: none"> <li>The proposed telecommunication mast site is more than 32 meters away from any significant watercourses, streams, or wetlands. The closest aquatic features (approximately 240 m from the proposed development), including nearby farm dams and engineered streams, are highly modified and not natural ecosystems</li> <li>There is no aquatic ecological connectivity between the mast site and any aquatic habitats, and the project is not expected to impact the surrounding freshwater systems</li> <li>The site's erodible soils present a minor risk of sediment runoff into nearby aquatic features during construction, especially during rainfall.</li> </ul> <p><b>Heritage Resources Findings (Appendix G4):</b></p> <ul style="list-style-type: none"> <li>As per the NID, the anticipated impact on heritage resources will be very low. Furthermore, the heritage specialist recommended that a heritage impact assessment will not be required.</li> </ul> <p><b>Visual Impact Assessment Findings (Appendix G5):</b></p> <ul style="list-style-type: none"> <li>The visual impact of the proposed 25m lattice mast is assessed as <b>low to moderate</b>. The mast will be visible from certain key viewpoints, including nearby tourism facilities (e.g., Imbuko Wines) and residential estates, but natural screening from topography and vegetation mitigates much of the impact.</li> <li>The mast is situated in an agricultural landscape where similar infrastructure (e.g., existing masts) is already present. The open, lattice design reduces its visual bulk and blends more with the environment compared to bulkier alternatives.</li> <li>The cumulative visual impact is considered <b>low</b>, as there are no other masts within a close distance that would contribute significantly to visual clutter.</li> </ul>	
1.2.	Provide a map that that superimposes the preferred activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. (Attach map to this BAR as Appendix B2)
Please refer to Appendix B (Site Development Plan) and D (Biodiversity Overlay Map)	
1.3.	Provide a summary of the positive and negative impacts and risks that the proposed activity or development and alternatives will have on the environment and community.
<p><b>Positive Impacts:</b></p> <p><b>1. Improved Telecommunications Infrastructure:</b></p> <ul style="list-style-type: none"> <li>The proposed 25m mast will significantly enhance mobile and internet connectivity in the surrounding area, benefiting residents, businesses, and emergency services</li> <li>This infrastructure improvement aligns with regional development goals and supports economic growth, educational access, and communication needs</li> </ul>	

2. **Minimal Impact on Agriculture:**
  - The site is located on non-arable land with low agricultural potential, ensuring that productive farmland is not affected. The placement avoids agricultural disruptions, ensuring continued farming activities (Appendix G1 – Agriculture Compliance Statement)
3. **Co-location Potential:**
  - The design of the mast supports co-location, allowing other telecommunications providers to use the same structure, minimizing the need for potential additional towers in the future and reducing cumulative environmental impacts
4. **Low Visual Impact:**
  - The lattice mast design minimizes the visual impacts of bulk structures, blending into the surrounding landscape. Its elevated position allows for optimal signal distribution with limited visual intrusion from key viewpoints (Appendix G5 – Visual Impact Assessment)
5. **Biodiversity and Habitat Protection:**
  - The site is located in a disturbed area with low biodiversity sensitivity, avoiding significant impacts on natural habitats. Recommendations for protecting indigenous trees and removing invasive species will support local biodiversity (Appendix G2 – Biodiversity Assessment)
6. **Socio-economic Benefits:**
  - Enhanced connectivity will support local businesses, increase access to education and healthcare services (through online platforms), and improve the quality of life for residents. The infrastructure will also aid in emergency response and disaster management

**Negative Impacts and Risks:**

1. **Construction-related Disturbances:**
  - Noise, dust, and increased traffic during the construction phase could temporarily impact local residents and agricultural activities. Erosion and runoff during construction may lead to sedimentation in nearby watercourses if not managed properly (Appendix G3 – Freshwater Assessment & G5 – Visual Impact Assessment)
2. **Erosion and Soil Disturbance:**
  - The site's shallow soils are prone to erosion, particularly during heavy rains. Without proper erosion control measures, construction could lead to soil loss and increased sedimentation in nearby water systems (Appendix G1 – Agriculture Compliance Statement & G3 – Freshwater Assessment)
3. **Visual Impact:**
  - Although the visual impact is minimized by the lattice design and the site's natural screening, the mast will still be visible from certain residential and tourism areas, potentially altering the sense of place in the surrounding landscape (Appendix G5)
4. **Disruption to Local Fauna:**
  - During construction, there may be a temporary disturbance to local wildlife, particularly birds and small mammals, due to increased human activity and noise (Appendix G2 – Biodiversity Assessment)
5. **Limited Aquatic Risks:**
  - While the site is located more than 32 meters from any significant watercourses, erosion from the construction site could still pose a minor risk to nearby aquatic environments. Effective stormwater management and erosion control will mitigate this risk (Appendix G3 – Freshwater Assessment)
6. **Cumulative Impact of Infrastructure:**
  - Although the cumulative visual impact is low, adding another mast in an area with existing infrastructure may contribute to landscape clutter, especially if more towers are installed in the future without careful planning (Appendix G5 – Visual Impact Assessment)

**2. Recommendation of the Environmental Assessment Practitioner (“EAP”)**

2.1.	Provide Impact management outcomes (based on the assessment and where applicable, specialist assessments) for the proposed activity or development for inclusion in the EMPr
Impact management, mitigation, and monitoring measures are captured in the impact assessment and significance rating, attached as Appendix J, as well as in the EMPr attached as Appendix H. Please refer to Appendix I with regards to the DFFE Screening Tool and SSVR.	
The EMPr forms part of the contractual obligations to which all persons including but not limited to, contractors/sub-contractors or employees involved in construction, operation, maintenance, or decommissioning work, must be	

committed. It also serves as a baseline information document for the project applicant and any entity working on behalf of the applicant, during the various phases of the proposed activity.

The EMPr aims to comply with Section 24N of the National Environmental Management Act No. 107 of 1998, as amended (NEMA), as well as any additional specific information requested by any government department, including the regulating authority for this specific project, DEA&DP.

The overall objective of the EMPr is to direct and guide all responsible parties, binding all contractors, sub-contractors and all other persons working on the site to adhere to the terms and conditions of the EMPr during the construction, operation, maintenance, and demolition/decommissioning (if applicable) phases of the project.

The overall outcome of the EMPr is to prevent avoidable damage and/or minimise or mitigate unavoidable environmental damage associated with the construction, operation, maintenance, and decommissioning phases (not applicable for this project as it is not foreseen for the mast to be decommissioned) of the proposed project.

The specific outcomes of the EMPr will be achieved through ensuring that the mitigation and management measures detailed in the EMPr are implemented and adhered to throughout the project duration.

Compliance monitoring and independent assessment/auditing allow the verification of achievement of the EMPr outcomes and ultimately, fulfilment of the EMPr objectives.

The EMPr is partly prescriptive (identifying specific people or organisations to undertake specific tasks, in order to ensure that impacts on the environment are minimised) but it is also a dynamic, evolving document, in that information gained during the various activities and/or monitoring of procedures on site, could lead to changes in the EMPr.

The EMPr:

- identifies project activities that could cause actual environmental damage (or potential environmental risks) and provides a summary of actions required
- identifies persons responsible for ensuring compliance with the EMPr
- provides standard procedures to avoid and/or minimise the identified negative environmental impacts and to enhance the positive impact of the project on the environment
- provides site and project specific rules and actions required, including a site plan/s showing:
  - areas where construction, maintenance work may be carried out
  - areas where any material or waste may be stored
  - allowed access routes, parking and turning areas for construction or construction-related vehicles;
- forms a written record of procedures, responsibilities, requirements, and rules for contractor/s, their staff and any other person who must comply with the EMPr

Mitigation measures, incorporated in the EMPr must be implemented should the proposed development be approved.

### **Terrestrial Biodiversity**

The following measures should be implemented during the construction phase:

- A suitably qualified environmental control officer (ECO) should be appointed to oversee the construction phase, including laydown areas selection and waste- and wastewater management
- The green & yellow area in Figure 7 of the Terrestrial Biodiversity Assessment (Appendix G2) are considered of botanical significance and should be protected and regarded as No-Go areas during the construction phase
- The construction site must be demarcated (approved by the ECO) and all construction activities must remain within this demarcated area
- No additional impact must be allowed on the remaining indigenous vegetation (Refer to Figure 7 Terrestrial Biodiversity Assessment (Appendix G2))

### **Freshwater**

The following mitigation measures should be implemented during the construction phase

- During the construction phase, when the foundations are made, no more land must be disturbed that is necessary, as loose sand and sediments will be washed downhill along the farm roads and will eventually end up in the downstream aquatic habitat. Deposition and infilling may further downgrade aquatic habitat even more than it already is
- The farm roads must be provided with berms and whatever stormwater management infrastructure is required to divert runoff from the roads. Sediment transport down the slope must be prevented as far as possible
- Construction must be concluded in the dry summer months
- Heavy heaving of several cubic metres of concrete up the steep incline is bound to happen. The access road is about to take punishment during this operation. The road must be kept in a good state of repair. It must be immediately repaired following damage done by heavy vehicles and earth-moving machinery. The access road must not be allowed to form even deeper trenches



<b>Heritage</b>	
<ul style="list-style-type: none"> <li>The heritage specialist recommended that no Heritage Impact Assessment will be required as the potential impact on any heritage resources is very low</li> <li>Although unlikely, should any heritage resources be discovered/uncovered during the construction phase, construction activities must be immediately ceased. The ECO must be immediately notified and the relevant personnel at Heritage Western Cape (HWC) must be contacted to advise on the way forward.</li> </ul>	
<b>Visual</b>	
<ul style="list-style-type: none"> <li>These masts are usually grey in colour. Since it is less than 45m it does not need to be painted red and white in accordance with the CAA requirements. The grey colour range is acceptable and no further mitigation measures are required in this regard</li> <li>In order to avoid potential lighting pollution is suggested that the security lights are directed downward</li> </ul>	
2.2.	Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation.
Compliance with the EMPr (Appendix H) must be mandatory; and	
<ul style="list-style-type: none"> <li>Appointment of an Environmental Control Officer during the construction phase;</li> <li>Method statement(s) must be agreed upon and signed off by the ECO;</li> <li>Provisions must be made for rehabilitation (if applicable); and</li> <li>Recommendations as set out in the EMPr must be adhered to at all times.</li> </ul>	
2.3.	Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.
<p>Based on the findings of the Environmental Impact Assessment (EIA), it is recommended that the proposed 25m telecommunication mast at Diemersfontein should be authorised. The project demonstrates significant socio-economic benefits with minimal environmental impacts, provided that the recommended mitigation measures are effectively implemented. Below is the justification for this opinion:</p> <ol style="list-style-type: none"> <li><b>Socio-Economic Benefits:</b> <ul style="list-style-type: none"> <li>The development will provide essential telecommunications infrastructure, improving <b>connectivity</b> for residents, businesses, and emergency services. This aligns with local and regional development priorities, promoting <b>economic growth</b>, improved <b>access to services</b>, and enhancing the <b>quality of life</b> in the area</li> </ul> </li> <li><b>Minimal Environmental Impacts:</b> <ul style="list-style-type: none"> <li>The proposed site is located in a <b>disturbed area</b> with <b>low</b> agricultural and biodiversity sensitivity. It avoids critical ecosystems, and the development footprint does not encroach on productive farmland</li> <li>The design of the mast, particularly the <b>lattice structure</b>, minimizes <b>visual intrusion</b>, blending into the natural landscape as much as possible</li> </ul> </li> <li><b>Effective Mitigation Measures:</b> <ul style="list-style-type: none"> <li>The EIA has identified <b>mitigation measures</b> to address potential impacts, including erosion control, protection of indigenous vegetation, and proper construction practices to minimize noise, dust, and disturbances. These measures are feasible and will ensure that the development proceeds in an environmentally responsible manner</li> </ul> </li> <li><b>Alignment with Development Plans:</b> <ul style="list-style-type: none"> <li>The proposed development aligns with the local <b>IDP</b> and <b>SDF</b> which emphasize the need for improved infrastructure and services to support growth and sustainability in the region</li> </ul> </li> <li><b>No-Go Alternative Consideration:</b> <ul style="list-style-type: none"> <li>The <b>No-Go Alternative</b> would avoid any environmental impacts but would also forfeit the significant socio-economic benefits of improved telecommunications. The absence of these services would continue to limit opportunities for economic development, education, and access to emergency services</li> </ul> </li> </ol> <p><b><u>It is therefore recommended that this application be authorised with the necessary conditions of approval as described throughout this BAR and in the EMPr.</u></b></p>	
2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.
The following assumptions are made:	
<ul style="list-style-type: none"> <li>The information on which the report is based (i.e. project information) is correct</li> <li>The construction and management of this proposed development will be in line with the recommendations in this report, which will be enforced by the implementation of conditions stipulated in the EMPr. Much of the long-term success lies in the effective implementation of the measures prescribed in the EMP</li> <li>There are no significant gaps of knowledge that have been identified</li> </ul>	
There are no uncertainties that we are aware of at present.	
2.5.	The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.

It is recommended that the EA is granted and valid for a period of 5 years and construction should be completed within 1 year from commencement.

### 3. Water

Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.

The activity does not require water during the construction or operational phases.

### 4. Waste

Explain what measures have been taken to reduce, reuse or recycle waste.

Minimal amounts of building rubble will be generated during construction activities. The portable toilet should not be placed within 32m of any watercourse and should be serviced in a legal manner and removed after construction is completed. Waste receipts will be required as proof of safe disposal.

All waste generated on site (general and hazardous) must be collected, consolidated in dedicated bins, removed, and disposed of at registered disposal facilities. Waste must be separated into recyclable and non-recyclable material and disposed of at a dedicated recycling point (where applicable).

### 5. Energy Efficiency

8.1. Explain what design measures have been taken to ensure that the development proposal will be energy efficient.

Electricity will be sourced from Eskom.

## SECTION K: DECLARATIONS

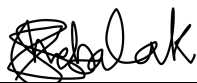
### DECLARATION OF THE APPLICANT

**Note:** Duplicate this section where there is more than one Applicant.

**Sherika Sheobalak** ID number **8802270043087**  
I....., ID number .....in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;
- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
  - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
  - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;
- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
  - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
  - Legitimate costs in respect of specialist(s) reviews; and
  - the provision of security to ensure compliance with applicable management and mitigation measures;
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

**Note:** If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.



Signature of the Applicant:

05-11-2024

Date:

**Sheobalak Engineering (Pty) Ltd on behalf of MAST Services (Pty) Ltd**

Name of company (if applicable):

## DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (“EAP”)

I .....Zandria Jordaan ....., EAP Registration number .....2023/7949..... as the appointed EAP hereby declare/affirm the correctness of the:

- Information provided in this BAR and any other documents/reports submitted in support of this BAR;
- The inclusion of comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant; and
- Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties, and that:
- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- In terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this application;
- I have ensured that information containing all relevant facts in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- I have ensured that the comments of all interested and affected parties were considered, recorded, responded to and submitted to the Competent Authority in respect of this application;
- I have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- I have kept a register of all interested and affected parties that participated in the public participation process; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;



04 November 2024

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Signature of the EAP:

Date:

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EnviroAfrica cc

Name of company (if applicable):

**DECLARATION OF THE REVIEW EAP**

I .....Clinton Geysler....., EAP Registration number .....2021/3287...as the Review EAP hereby declare/affirm that:

- I have reviewed all the work produced by the EAP;
- I have reviewed the correctness of the information provided as part of this Report;
- I meet all of the general requirements of EAPs as set out in Regulation 13 of the NEMA EIA Regulations;
- I have disclosed to the applicant, the EAP, the specialist (if any), the review specialist (if any), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations.



04 November 2024

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Signature of the EAP:

Date:

EnviroAfrica cc

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Name of company (if applicable):

## DECLARATION OF THE SPECIALIST

**Note:** Duplicate this section where there is more than one specialist.

I ....., as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

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Signature of the EAP:

Date:

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Name of company (if applicable):

**DECLARATION OF THE REVIEW SPECIALIST**

I ....., as the appointed Review Specialist hereby declare/affirm that:

- I have reviewed all the work produced by the Specialist(s):
- I have reviewed the correctness of the specialist information provided as part of this Report;
- I meet all of the general requirements of specialists as set out in Regulation 13 of the NEMA EIA Regulations;
- I have disclosed to the applicant, the EAP, the review EAP (if applicable), the Specialist(s), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations.

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Signature of the EAP:

Date:

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Name of company (if applicable):