

## **DRAFT BASIC ASSESSMENT REPORT:**



# **THE PROPOSED ESTABLISHMENT OF AN APPROXIMATELY 45M HIGH TELECOMMUNICATIONS MAST AND ASSOCIATED INFRASTRUCTURE ON ERF 33, UMZINTO NORTH**

**April 2023**

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**THE PROPOSED ESTABLISHMENT OF AN APPROXIMATELY 45M  
HIGH TELECOMMUNICATIONS LATTICE MAST AND ASSOCIATED  
INFRASTRUCTURE ON ERF 3, UMZINTO NORTH**

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	(For official use only)
<b>File Reference Number:</b>	
<b>Application Number:</b>	
<b>Date Received:</b>	

**Basic Assessment Report in terms of the Environmental Impact Assessment Regulations, 2014 (as amended), promulgated in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended**

**Kindly note that:**

- This **basic assessment report** is a standard report that may be required by a competent authority in terms of the EIA Regulations, 2014 and is meant to streamline applications. Please make sure that it is the report used by the competent authority for the activity that is being applied for.
- It is the responsibility of the applicant to ascertain whether subsequent versions of the form have been published or produced by the competent authority
- The report must be typed within the spaces provided in the form. The size of the spaces provided is not necessarily indicative of the amount of information to be provided. The report is in the form of a table that can extend itself as each space is filled with typing.
- Where applicable **tick** the boxes that are applicable in the report.
- An incomplete report may be returned to the applicant for revision.
- The use of “not applicable” in the report must be done with circumspection because if it is used in respect of material information that is required by the competent authority for assessing the application, it may result in the rejection of the application as provided for in the regulations.
- This report must be handed in at the offices of the relevant competent authority as determined by each authority.
- No faxed or e-mailed reports will be accepted.
- The signature of the EAP on the report must be original.
- The report must be compiled by an independent environmental assessment practitioner.
- Unless protected by law, all information in the report will become public information on receipt by the competent authority. Any interested and affected party should be provided with the information contained in this request report, during any stage of the application process.
- A competent authority may require that for specified types of activities in defined situations only parts of this report need to be completed.
- Should a specialist report or report on a specialised process be submitted at any stage for any part of this application, the terms of reference for such report must also be submitted.

## SECTION A: ACTIVITY INFORMATION

Has a specialist been consulted to assist with the completion of this section?

YES

NO

If YES, please complete the form titled "Details of specialist and declaration of interest" for the specialist appointed and attach it in Appendix I.

### 1) ACTIVITY DESCRIPTION

#### a) Describe the project associated with the listed activities applied for

The proposed development entails the establishment of a lattice telecommunications mast of approximately 45m in height and associated infrastructure within a sugarcane field on Erf 33, Umzinto North. The telecommunications mast and associated infrastructure will be placed within a fenced off compound of approximately 100m<sup>2</sup> in size. Please the technical details of the proposed telecommunications mast and associated infrastructure in the Appendix C

The proposed site is accessible from existing roads in the area and electricity is also available from the existing sugarcane farm that exist on Erf 33, Umzinto North.

b. Provide a detailed description of the listed activities associated with the project as applied for

Listed activity as described in GN 327, 325 and 324, EIA Regulations (2014 as amended)	Description of project activity
<p><b>GN 324 Listing Notice 3</b></p> <p><b>Activity 3:</b> 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— but excluding attachments to existing buildings and masts on rooftops.</p> <p><b>d. KwaZulu-Natal</b></p> <p>i. In an estuarine functional zone;</p> <p>ii. Trans-frontier protected areas managed under international conventions;</p> <p>iii. Community Conservation Areas;</p> <p>iv. World Heritage Sites;</p> <p>v. Biodiversity Stewardship Programme Biodiversity Agreement areas;</p> <p>vi. A protected area identified in terms of NEMPAA, excluding conservancies;</p> <p>vii. Sites or areas identified in terms of an international convention;</p> <p>viii. Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;</p> <p>ix. Core areas in biosphere reserves;</p> <p>x. Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority or zoned for a conservation purpose;</p> <p>xi. Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority;</p> <p>xii. Outside urban areas:</p> <p>(aa) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any terrestrial protected area identified in terms of NEMPAA or from the core areas of a biosphere reserve; or</p>	<p>The proposed development is a lattice telecommunications mast of approximately 45m in height and associated infrastructure that will be located within a sugarcane field on Erf 33, Umzinto North. The proposed telecommunications mast and associated infrastructure will be within 5km of the Vernon Crookes Nature Reserve.</p> <p>The infrastructure will be located within a fenced off area of approximately 100m<sup>2</sup> in size.</p>

<p>(bb) Areas seawards of the development setback line or within 1 kilometre from the high-water mark of the sea if no such development setback line is determined; or</p> <p>xiii. Inside urban areas:</p> <p>(aa) Areas seawards of the development setback line or within 100 metres from the high-water mark of the sea if no such development setback line is determined;</p> <p>(bb) Within urban protected areas;</p> <p>(cc) Areas zoned for use as public open space; or</p> <p>(dd) Areas within 1 kilometre from terrestrial protected areas identified in terms of NEMPAA.”.</p>	
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## 2) FEASIBLE AND REASONABLE ALTERNATIVES

**“alternatives”**, in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to—

- (a) the property on which or location where it is proposed to undertake the activity;
- (b) the type of activity to be undertaken;
- (c) the design or layout of the activity;
- (d) the technology to be used in the activity;
- (e) the operational aspects of the activity; and
- (f) the option of not implementing the activity.

Describe alternatives that are considered in this application as required by Appendix 1 (3)(h), Regulation 2014. Alternatives should include a consideration of all possible means by which the purpose and need of the proposed activity (NOT PROJECT) could be accomplished in the specific instance taking account of the interest of the applicant in the activity. The no-go alternative must in all cases be included in the assessment phase as the baseline against which the impacts of the other alternatives are assessed.

The determination of whether site or activity (including different processes, etc.) or both is appropriate needs to be informed by the specific circumstances of the activity and its environment. After receipt of this report the, competent authority may also request the applicant to assess additional alternatives that could accomplish the purpose and need of the proposed activity if it is clear that realistic alternatives have not been considered to a reasonable extent.

Indicate the position of the activity using the latitude and longitude of the centre point of the site for each alternative site. The coordinates should be in degrees, minutes and seconds. The projection that must be used in all cases is the WGS84 spheroid in a national or local projection.

### **Needs and Desirability**

The coverage that telecommunications towers currently provide to the areas on the northern outskirts of the town of Umzinto is inadequate, as voice calls are often dropped before cellular network customers can complete their conversations. Data calls e.g., WhatsApp calls are also often dropped in the area in the same manner. This poor provision of telecommunications services in the area is an inconvenience to cellular network customers and can even put the lives of members of the public at risk if calls are dropped while communicating with the police, fire brigade, ambulance or other emergency services providers. Considering that no telecommunications mast exists within a 1km radius of the proposed development as indicated on the radio frequency map in Appendix A3, the proposed development is much needed on the proposed site.



In light of the above, the convenience as well as the safety and security benefits that members of the public relying on telecommunication services in the Umzinto North area will enjoy, make the proposed development highly desirable.

**a) Site alternatives**

The proposed site is owned by Mr and Mrs Salatchiammal Govender and is located north of the town of Umzinto, outside of the urban area. Access to the proposed site exists and electricity is available on the sugarcane farm where the proposed site is located.

The landowner has given consent for the proposed telecommunications mast and associated infrastructure on the proposed site and the coverage that the proposed development will provide to the public is deemed sufficient for solving alleviating the existing coverage challenges in the area. In light of this, the proposed site is the preferred site alternative is the only site alternative that the applicant has considered.

**For route alternatives that are longer than 500m, please provide an addendum with coordinates taken every 250 meters along the route for each alternative alignment.**

**In the case of an area being under application, please provide the coordinates of the corners of the site as indicated on the lay-out map provided in Appendix A of this form.**

<b>Alternative 1 (preferred alternative)</b>		
<b>Description</b>	<b>Lat (DDMMSS)</b>	<b>Long (DDMMSS)</b>
Corner 1	<b>30°17'03.61"S;</b>	<b>30°40'09.11"E</b>
Corner 2	<b>30°17'08.27"S;</b>	<b>21°17'50.28"E</b>
Corner 3	<b>30°17'03.81"S;</b>	<b>30°40'09.69"E</b>
Corner 4	<b>30°17'03.81"S;</b>	<b>30°40'09.69"E</b>

**b) Layout alternatives**

The proposed development entails establishing an approximately 45m high lattice telecommunications mast and associated infrastructure within an approximately 100m<sup>2</sup> fenced off area within a sugarcane field on Erf 33, Umzinto North. A proposed development of this kind does not lend itself to the consideration of various layout alternatives and so no layout alternatives have been considered.

**c) Design alternatives**

The applicant has considered only a lattice mast for the proposed development, as lattice masts are less visually intrusive in rural environments due to their apparent broken structure.

<b>Alternative 1 (preferred alternative)</b>
See "ACTIVITY DESCRIPTION" of this BAR.

**d) Other alternatives (e.g. scheduling, demand, input and scale alternatives)**

NA

<b>Alternative 1 (preferred alternative)</b>		
N/A		
<b>Alternative 2</b>		
N/A		
<b>Alternative 3</b>		
N/A		

**e) No-go alternative**

The no-go alternative entails maintaining the *status quo*. The applicant would therefore let the existing situation of inadequate coverage on the northern outskirts of Umzinto remain unattended and telecommunications network users in the area would have to endure their voice calls and data calls being dropped.

Paragraphs 3 – 13 below should be completed for each alternative.

**3) PHYSICAL SIZE OF THE ACTIVITY**

a) Indicate the physical size of the preferred activity/technology as well as alternative activities/technologies (footprints):

**Alternative:**

Alternative A1 (preferred activity alternative)

**Size of the activity:**

The proposed lattice telecommunications mast is approximately 45m high and the footprint of the mast with associated infrastructure is approximately 100m<sup>2</sup>.

Alternative A2 (if any)

Alternative A3 (if any)

or, for **linear activities**: N/A

Alternative A1 (preferred activity alternative)

**Length of the activity:**

Alternative A1 (preferred activity alternative)

Alternative A2 (if any)

Alternative A3 (if any)

Alternative A4 (if any)

b) Indicate the size of the alternative sites or servitudes (within which the above footprints will occur):

Alternative A1 (preferred activity alternative)

**Length of the activity:**

	m <sup>2</sup>
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Alternative A1 (if any)

Alternative A2 (if any)

Alternative A3 (preferred activity alternative)

Alternative A4 (if any)

**4) SITE ACCESS**

Does ready access to the site exist?

<b>YES</b>	<b>NO</b>
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If NO, what is the distance over which a new access road will be built

Describe the type of access road planned:

Access to Erf 33, Umzinto North is gained by means of an existing road to the sugarcane farm

Include the position of the access road on the site plan and required map, as well as an indication of the road about the site.

## 5) LOCALITY MAP

An A3 locality map must be attached to the back of this document, as Appendix A. The scale of the locality map must be relevant to the size of the development (at least 1:50 000. For linear activities 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:

- an accurate indication of the project site position as well as the positions of the alternative sites, if any;
- indication of all the alternatives identified;
- closest town(s);
- road access from all major roads in the area;
- road names or numbers of all major roads as well as the roads that provide access to the site(s);
- all roads within a 1km radius of the site or alternative sites; and
- a north arrow;
- a legend; and
- locality GPS coordinates (Indicate the position of the activity using the latitude and longitude of the centre point of the site for each alternative site. The coordinates should be in degrees and decimal minutes. The minutes should have at least three decimals to ensure adequate accuracy. The projection that must be used in all cases is the WGS84 spheroid in a national or local projection).

## 6) LAYOUT/ROUTE PLAN

A detailed site or route plan(s) must be prepared for each alternative site or alternative activity. It must be attached as Appendix A to this document.

The site or route plans must indicate the following:

- the property boundaries and numbers of all the properties within 50 metres of the site;
- the current land use as well as the land-use zoning of the site;
- the current land use as well as the land-use zoning each of the properties adjoining the site or sites;
- the exact position of each listed activity applied for (including alternatives);
- servitude(s) indicating the purpose of the servitude;
- a legend; and
- a north arrow.

## 7) SENSITIVITY MAP

The layout/route plan as indicated above must be overlain with a sensitivity map that indicates all the sensitive areas associated with the site, including, but not limited to:

- watercourses;
- the 1:100 year flood line (where available or where it is required by DWS);
- ridges;

- cultural and historical features;
- areas with indigenous vegetation (even if it is degraded or infested with alien species); and
- critical biodiversity areas.

The sensitivity map must also cover areas within 100m of the site and must be attached in Appendix A.

## 8) SITE PHOTOGRAPHS

Colour photographs from the centre of the site must be taken in at least the eight major compass directions with a description of each photograph. Photographs must be attached under Appendix B to this report. It must be supplemented with additional photographs of relevant features on the site, if applicable.

## 9) FACILITY ILLUSTRATION

A detailed illustration of the activity must be provided at a scale of at least 1:200 as Appendix C for activities that include structures. The illustrations must be to scale and must represent a realistic image of the planned activity. The illustration must give a representative view of the activity.

## 10) ACTIVITY MOTIVATION

Motivate and explain the need and desirability of the activity (including demand for the activity):

<ul style="list-style-type: none"> <li>• <b>Is the activity permitted in terms of the property's existing land use rights?</b></li> </ul>	YES	NO	Please explain
The proposed site is zoned Agriculture and so a consent use in terms of land use planning legislation will have to be applied for and obtained before the proposed telecommunications mast and associated infrastructure on the proposed site can be established.			
<ul style="list-style-type: none"> <li>• <b>Will the activity be in line with the following?</b></li> </ul>			
<ul style="list-style-type: none"> <li>(a) <b>Provincial Spatial Development Framework (PSDF)</b></li> </ul>	YES	NO	Please explain
The footprint of the proposed telecommunications mast and associated infrastructure is approximately 100m <sup>2</sup> . The proposed development is therefore too small to have any bearing on the PSDF.			
<ul style="list-style-type: none"> <li>(b) <b>Urban edge / Edge of Built environment for the area</b></li> </ul>	YES	NO	Please explain
The footprint of the proposed telecommunications mast and associated infrastructure is approximately 100m <sup>2</sup> . The proposed development is therefore too small to have any bearing on the urban edge.			
<ul style="list-style-type: none"> <li>(c) <b>Integrated Development Plan (IDP) and Spatial Development Framework (SDF) of the Local Municipality (e.g. would the approval of this application compromise the integrity of the existing approved and credible municipal IDP and SDF?).</b></li> </ul>	YES	NO	Please explain

The proposed development is too small to adversely impact the municipal IDP and SDF. In fact, the proposed telecommunications mast and associated infrastructure will augment the currently inadequate telecommunications coverage on the outskirts of Umzinto North. A sure benefit of this is that fewer phone calls relating to *inter alia*, municipal service provision will be dropped without having been completed

<b>(d) Approved Structure Plan of the Municipality</b>	YES	NO	Please explain
The proposed development of approximately 100m <sup>2</sup> is too small to adversely impact the Approved Structure Plan of the municipality.			
<b>(e) An Environmental Management Framework (EMF) adopted by the Department (e.g. Would the approval of this application compromise the integrity of the existing environmental management priorities for the area and if so, can it be justified in terms of sustainability considerations?)</b>	YES	NO	Please explain
The proposed development of approximately 100m <sup>2</sup> is too small to adversely impact any EMF.			
<b>(f) Any other Plans (e.g. Guide Plan)</b>	YES	NO	Please explain
The proposed development of approximately 100m <sup>2</sup> is too small to adversely impact the Guide Plan.			
<ul style="list-style-type: none"> <li><b>Is the land use (associated with the activity being applied for) considered within the timeframe intended by the existing approved SDF agreed to by the relevant environmental authority (i.e. is the proposed development in line with the projects and programmes identified as priorities within the credible IDP)?</b></li> </ul>	YES	NO	Please explain
The proposed telecommunications mast and associated infrastructure is of such small scale, i.e., 100m <sup>2</sup> that the proposed development has no bearing on the municipal SDF or municipal IDP.			
<ul style="list-style-type: none"> <li><b>Does the community/area need the activity and the associated land use concerned (is it a societal priority)? (This refers to the strategy as well as the local level (e.g. development is a national priority, but within a specific local context it could be inappropriate.)</b></li> </ul>	YES	NO	Please explain
<p>The proposed 45m high lattice telecommunication mast will allow for multiple service providers/mobile network operators to attach and house their equipment (antennas) on the mast, decreasing the need for additional communications masts to be erected in the area. The benefits of telecommunications services in modern society are potentially limitless. The proposed development will increase the coverage of telecommunications services, including providing more reliable and wider coverage. This will create a more efficient telecommunications service, considered essential to the business and private sector. The data capabilities provided by the proposed mast are also important in business, education and for the public, and has thus become paramount for social and economic development.</p> <p>The construction of the telecommunications mast is therefore considered as part of the essential services for the greater community.</p>			
<ul style="list-style-type: none"> <li><b>Are the necessary services with adequate capacity currently available (at the time of application), or must additional capacity be created to cater for the development? (Confirmation by the relevant Municipality in this regard must be attached to the final Basic Assessment Report as Appendix I.)</b></li> </ul>	YES	NO	Please explain
Electricity is available for the proposed telecommunications mast and associated base station			

<p>infrastructure on Erf 33, Umzinto North and access is also available. Water and other municipal services will not be required.</p>			
<p>• <b>Is this development provided for in the infrastructure planning of the municipality, and if not what will the implication be on the infrastructure planning of the municipality (priority and placement of services and opportunity costs)? (Comment by the relevant Municipality in this regard must be attached to the final Basic Assessment Report as Appendix I.)</b></p>	<p>YES</p>	<p>NO</p>	<p>Please explain</p>
<p>The proposed telecommunications mast and associated base station infrastructure is to be established and operated privately. The proposed development will not form part of municipal infrastructure.</p>			
<p>• <b>Is this project part of a national programme to address an issue of national concern or importance?</b></p>	<p>YES</p>	<p>NO</p>	<p>Please explain</p>
<p>N/A</p>			
<p>• <b>Do location factors favour this land use (associated with the activity applied for) at this place? (This relates to the contextualisation of the proposed land use on this site within its broader context.)</b></p>	<p>YES</p>	<p>NO</p>	<p>Please explain</p>
<p>A shortfall of telecommunication coverage exists on the northern outskirts of Umzinto, causing voice calls and data calls to frequently be dropped without having been completed. The proposed development will enable multiple telecommunications network providers to mount antennas on the single proposed mast and alleviate the coverage shortfalls that inconvenience cellular network customers in the area. The radio frequency map in Appendix A3 indicates that no telecommunications mast currently exists within 1km of the proposed site and therefore the proposed development will not cause any unnecessary crowding of telecommunication masts and associated infrastructure in the area.</p>			
<p>• <b>Is the development the best practicable environmental option for this land/site?</b></p>	<p>YES</p>	<p>NO</p>	<p>Please explain</p>
<p>The proposed site is located at the corner of an active sugarcane field on a sugarcane farm. The potential agricultural impact of approximately 100m<sup>2</sup> of agricultural land being lost for the establishment of the proposed development is of moderate significance. This is confirmed in the Agricultural Compliance Statement attached hereto as Appendix 3. The potential impact on biodiversity is of low to negligible significance, as the active sugarcane field has no indigenous vegetation that can provide any habitat. This is confirmed in the Terrestrial Biodiversity Compliance Statement attached hereto as Appendix D1. The expected visual impact of the proposed development is of moderate significance and this is confirmed in the Visual Impact Assessment attached hereto as Appendix D2. The potential impact of the proposed development on cultural/historical and paleontological aspects is low (Appendix D4, refers)</p> <p>In light of the moderate to low potential environmental impacts expected from the proposed development and the fact that the proposed development will significantly help towards ending the current shortfalls in telecommunications coverage without causing a crowding of telecommunication masts (Appendix A3, refers) on the northern outskirts of Umzinto, the proposed development seems to be the Best Practicable Environmental Option.</p>			
<p>• <b>Will the benefits of the proposed land use/development outweigh the negative impacts?</b></p>	<p>YES</p>	<p>NO</p>	<p>Please explain</p>

The potential agricultural impact of approximately 100m<sup>2</sup> of agricultural land being lost for the establishment of the proposed development is of moderate significance. This is confirmed in the Agricultural Compliance Statement attached hereto as Appendix D3. The potential impact on biodiversity is of low to negligible significance, as the active sugarcane field has no indigenous vegetation that can provide any habitat. This is confirmed in the Terrestrial Biodiversity Compliance Statement attached hereto as Appendix D1. The expected visual impact of the proposed development is of moderate significance and this is confirmed in the Visual Impact Assessment attached hereto as Appendix D2.

In light of the moderate to low potential environmental impacts that society is likely to endure as a result of the proposed development and the significant benefits that society will enjoy when the proposed development results in the availability of adequate telecommunications coverage on the northern outskirts of Umzinto, it is clear that the societal benefits that will result from the proposed development far outweigh the likely negative impacts.

<ul style="list-style-type: none"> <li>• <b>Will the proposed land use/development set a precedent for similar activities in the area (local municipality)?</b></li> </ul>	YES	NO	Please explain
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It is only after having been granted an environmental authorisation by the competent authority that telecommunications service providers can establish a telecommunications mast taller than 15m. The process of applying for environmental authorisation is very taxing and so instead of each telecommunications service provider applying for environmental authorisation for a separate telecommunications mast in Umzinto North, the telecommunications service providers are likely to rather seek an arrangement in which the antennas of different telecommunications service providers share space on the single proposed mast.

It is therefore unlikely that an approval of the proposed telecommunications mast and associated infrastructure would set a precedent for similar applications in the area of Umzinto North.

<ul style="list-style-type: none"> <li>• <b>Will any person's rights be negatively affected by the proposed activity/ies?</b></li> </ul>	Yes	NO	Please explain
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The potential agricultural impact of approximately 100m<sup>2</sup> of agricultural land being lost for the establishment of the proposed development is of moderate significance. This is confirmed in the Agricultural Compliance Statement attached hereto as Appendix D3. The potential impact on biodiversity is of low to negligible significance, as the active sugarcane field has no indigenous vegetation that can provide any habitat. This is confirmed in the Terrestrial Biodiversity Compliance Statement attached hereto as Appendix D1. The expected visual impact of the proposed development is of moderate significance and this is confirmed in the Visual Impact Assessment attached hereto as Appendix D2 and the expected cultural/ historical and palaeontological impact of the proposed development is low (Appendix D4, refers).

In light of the moderate to low potential environmental impacts that society is likely to endure as a result of the proposed development and the significant benefits that society will enjoy when the proposed development results in the availability of adequate telecommunications coverage on the northern outskirts of Umzinto, it is clear that the societal benefits that will result from the proposed development far outweigh the likely negative impacts.

<ul style="list-style-type: none"> <li>• <b>Will the proposed activity/ies compromise the "urban edge" as defined by the local municipality?</b></li> </ul>	YES	NO	Please explain
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The proposed development is only 100m<sup>2</sup> in size and is therefore too small to have any bearing on the urban edge.

<ul style="list-style-type: none"> <li>• <b>Will the proposed activity/ies contribute to any of the 17 Strategic Integrated Projects (SIPS)?</b></li> </ul>	YES	NO	Please explain
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<ul style="list-style-type: none"> <li>• <b>What will the benefits be to society in general and the local communities?</b></li> </ul>	Please explain
<p>The provision of adequate telecommunications services is essential for ensuring that the police, ambulances, fire brigade and other emergency services providers can be communicated with effectively so that lives and property can be saved. In addition, nowadays almost every business requires adequate telecommunications services in order to communicate with clients and even individual people require adequate telecommunications services in order to effectively maintain social bonds with families and friends. The benefits of the improved telecommunications coverage that will become available in Umzinto North as a result of the proposed development are enumerable.</p>	
<ul style="list-style-type: none"> <li>• <b>Any other need and desirability considerations related to the proposed activity?</b></li> </ul>	Please explain
N/A	
<ul style="list-style-type: none"> <li>• <b>How does the project fit into the National Development Plan for 2030?</b></li> </ul>	Please explain
<p>The proposed telecommunications mast and associated infrastructure will augment the provision of telecommunications services to the members of the public on the northern outskirts of Umzinto. This is in line with the National Development Plan for 2030<sup>1</sup> in that the National Development Plan aims to <i>inter alia</i>, promote the development of infrastructure that supports the improvement of services provision to the public.</p>	
<ul style="list-style-type: none"> <li>• <b>Please describe how the general objectives of Integrated Environmental Management as set out in Section 23 of the NEMA have been taken into account.</b></li> </ul>	
<p>The general objectives of Integrated Environmental Management, namely, to promote sustainable development through the integration of social, economic and ecological considerations as well as the maintenance of inter- and intra-generational equity have been taken into account through the following:</p> <ul style="list-style-type: none"> <li>• The actual and potential impacts of the activity on the environment, socio-economic conditions, and cultural heritage, relative to the proposed site for development, have been identified and evaluated. The proposed mitigation measures, with a view to minimizing negative impacts on the environment, socio-economic conditions, and any cultural heritage, while maximizing benefits and promoting compliance with the principles of environmental management, were assessed.</li> <li>• The potential environmental impacts of the proposed telecommunications mast and associated infrastructure on Erf 33, Umzinto North have been identified, assessed, and mitigation measures proposed to minimise the impacts.</li> <li>• The identification of potential employment opportunities to promote socio-economic development in the local area.</li> <li>• A public participation process that meets the minimum legal requirements has been followed for the Basic Assessment application to help ensure that the decision-making process takes into account the comments of members of the public.</li> <li>• The environmental features of the proposed site have been considered and evaluated in the management and decision-making of the activity. An EMPr has been compiled and included (Appendix G) relative to the proposed development along with potential impacts and mitigation measures that must be adhered to during the implementation phase of the proposed development to reduce and mitigate identified impacts.</li> </ul>	
<ul style="list-style-type: none"> <li>• <b>Please describe how the principles of environmental management as set out in section 2 of NEMA have been taken into account.</b></li> </ul>	
<p>The principles of environmental management, as per section 2 of the NEMA, have been taken into account. The principles about this activity include:</p>	

<sup>1</sup>National Development Plan, 2030. Accessed at <https://www.gov.za/sites/default/files/Executive%20Summary-NDP%202030%20-%20Our%20future%20-%20make%20it%20work.pdf>



- **Socioeconomic development:** People and their needs have been placed at the forefront while serving their physical, psychological, developmental, cultural, and social interests – the proposed activity is unlikely to cause an overall negative effect on people. The proposed telecommunications mast and associated infrastructure will alleviate the current shortfalls in coverage that voice calls to be dropped without conversations having been completed and data calls to be dropped in the same manner and data calls to keep being interrupted by a lag before the data calls can resume. Employment opportunities spanning the construction phase will be created.
- **Sustainable development:** Development must be socially, environmentally and economically sustainable. The environmental impacts associated with the proposed development will be minimized by implementing the proposed mitigation measures as per the EMPr (Appendix G). The identified impacts will be negated through good technical/ engineering practices and environmental advice. The social, economic and ecological impacts of the proposed development have been including the disadvantages and benefits, and mitigation measures proposed for implementation.
- **Transparent Public Participation Process:** The public participation process followed gives I&APs an opportunity to view the draft report that will subsequently be submitted to the competent authority for decision-making and the decision of the competent authority will be forwarded to all I&APs so that whomsoever wishes to appeal the decision may appeal.

**11) LIST ALL LEGISLATION, POLICIES AND/OR GUIDELINES OF ANY SPHERE OF GOVERNMENT THAT ARE APPLICABLE TO THE APPLICATION AS CONTEMPLATED IN THE EIA REGULATIONS, IF APPLICABLE**

List all legislation, policies and/or guidelines of any sphere of government that apply to the application as contemplated in the EIA regulations, if applicable:

Title of legislation, policy or guideline	Applicability to the project	Administering authority	Date
The National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the Environmental Impact Assessment ("EIA") Regulations of 2014 (as amended)	Applications for environmental authorisation must comply with the requirements specified in the NEMA and in the EIA Regulations of 2014 (as amended)	Kwazulu-Natal Department of Economic Development, Tourism and Environmental Affairs.	This application
Integrated Environmental Management Information Series	Criteria to be used for evaluating the environmental impacts of the proposed activity during the NEMA EIA application process (a copy of the Integrated Environmental Management Information Series can be accessed at <a href="https://www.environment.gov.za/documents/strategies/integrated_environmentalmanagement_eim">https://www.environment.gov.za/documents/strategies/integrated_environmentalmanagement_eim</a> ).	Kwazulu-Natal Department of Economic Development, Tourism and Environmental Affairs.	This application
By-laws of Umdoni Local Municipality and Ugu District Municipality	To be adhered to during the construction and operational phase.	Local and District Municipalities	In progress

## 12) WASTE, EFFLUENT, EMISSION AND NOISE MANAGEMENT

### a) Solid waste management

Will the activity produce solid construction waste during the construction/initiation phase?

YES	NO
-----	----

If YES, what estimated quantity will be produced per month?

≈15 m <sup>3</sup>
--------------------

How will the construction solid waste be disposed of (describe)?

Waste generated on-site during construction activities (concrete, plastic wrapping, and general waste) will be consolidated, adequately stored, and disposed of at a lawfully registered waste disposal facility. Before disposal, general waste will be separated and recycled accordingly.
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Where will the construction solid waste be disposed of (describe)?

Waste generated on-site during construction activities (concrete, plastic wrapping, and general waste) will be collected, adequately stored, and disposed of at a registered, municipal-approved waste disposal facility (with Municipal approval). Before disposal, general waste will be separated and recycled accordingly.
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Will the activity produce solid waste during its operational phase?

YES	NO
-----	----

If YES, what estimated quantity will be produced per month?

m <sup>3</sup>
----------------

How will the solid waste be disposed of (describe)?

--

If the solid waste will be disposed of into a municipal waste stream, indicate which registered landfill site will be used.

--

Where will the solid waste be disposed of if it does not feed into a municipal waste stream (describe)?

N/A
-----

*If the solid waste (construction or operational phases) will not be disposed of at a registered landfill site or be taken up in a municipal waste stream, then the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.*

Can any part of the solid waste be classified as hazardous in terms of the NEM: WA?

YES	NO
-----	----

If YES, inform the competent authority and request a change to an application for scoping and EIA. An application for a waste permit in terms of the NEM: WA must also be submitted with this application.

Is the activity that is being applied for a solid waste handling or treatment facility?

YES	NO
-----	----

If YES, then the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA. An application for a waste permit in terms of the NEM: WA must also be submitted with this application.

### b) Liquid effluent

Will the activity produce effluent, other than normal sewage, that will be disposed of in a municipal sewage system?

YES	NO
-----	----

If YES, what estimated quantity will be produced per month?

m <sup>3</sup>
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Will the activity produce an effluent that will be treated and/or disposed of on-site?

YES	NO
-----	----

*If YES, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.*

Will the activity produce effluent that will be treated and/or disposed of at another facility? 

YES	NO
-----	----

If YES, provide the particulars of the facility:

<b>Facility Name:</b>			
<b>Contact person:</b>			
<b>Postal address:</b>			
<b>Postal code:</b>			
<b>Telephone:</b>		<b>Cell:</b>	
<b>E-mail:</b>		<b>Fax:</b>	

Describe the measures that will be taken to ensure the optimal reuse or recycling of wastewater, if any:

N/A
-----

**c) Emissions into the atmosphere**

Will the activity release emissions into the atmosphere other than exhaust emissions and dust associated with construction phase activities? 

YES	NO
-----	----

If YES, is it controlled by any legislation of any sphere of government? 

YES	NO
-----	----

If YES, the applicant must consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

If NO, describe the emissions in terms of type and concentration:

**d) Waste permit**

Will any aspect of the activity produce waste that will require a waste permit in terms of the NEM: WA? 

YES	NO
-----	----

If YES, please submit evidence that an application for a waste permit has been submitted to the competent authority - N/A

**e) Generation of noise**

Will the activity generate noise? 

YES	NO
-----	----

If YES, is it controlled by any legislation of any sphere of government? 

YES	NO
-----	----

Describe the noise in terms of type and level:  

Normal construction-related noise is likely and will be limited to normal working hours as is explained in the EMPr. In addition, the proposed telecommunications mast and associated infrastructure is a small project whose construction phase should not last more than a handful of months.
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### 13) WATER USE

Please indicate the source(s) of water that will be used for the activity by ticking the appropriate box(es):

Municipal	Waterboard	Groundwater	River, stream, dam or lake	Other	The activity will not use water
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If water is to be extracted from groundwater, river, stream, dam, lake or any other natural feature, please indicate the volume that will be extracted per month:

Does the activity require a water use authorisation (general authorisation or water use license) from the Department of Water Affairs?

YES

NO

If YES, please provide proof that the application has been submitted to the Department of Water Affairs.

### 14) ENERGY EFFICIENCY

Describe the design measures, if any, which have been taken to ensure that the activity is energy efficient:

N/A
-----

Describe how alternative energy sources have been taken into account or been built into the design of the activity if any:

N/A
-----

## SECTION B: SITE/AREA/PROPERTY DESCRIPTION

### Important notes:

- For linear activities (pipelines, etc.) as well as activities that cover very large sites, it may be necessary to complete this section for each part of the site that has a significantly different environment. In such cases please complete copies of Section B and indicate the area, which is covered by each copy No. on the Site Plan.

Section B Copy No. (e.g. A):

- Paragraphs 1 - 6 below must be completed for each alternative.

- Has a specialist been consulted to assist with the completion of this section?

YES  NO

If YES, please complete the form titled "Details of specialist and declaration of interest" for each specialist thus appointed and attach it in Appendix I. All specialist reports must be contained in Appendix D.

<b>Property description/physical address:</b>	<b>Province</b>	Kwazulu-Natal			
	<b>District Municipality</b>	Ugu District Municipality			
	<b>Local Municipality</b>	Umdoni Local Municipality			
	<b>Ward Number(s)</b>				
	<b>Farm name and Number</b>	Erf 33, Umzinto North			
	<b>SG Code</b>	NOET03590000003300000			
Where a large number of properties are involved (e.g. linear activities), please attach a full list to this application including the same information as indicated above.					
<b>Current land-use zoning as per local municipality IDP/records:</b>	Agriculture				
	In instances where there is more than one current land-use zoning, please attach a list of current land use zonings that also indicate which portions each use pertains to, to this application.				
Is a change of land-use or a consent use application required?				<input type="checkbox"/> YES	<input type="checkbox"/> NO

### 1) GRADIENT OF THE SITE

Indicate the general gradient of the site.

#### Alternative S1 (Preferred):

Flat	1:50 – 1:20 Average	1:20 – 1:15	1:15 – 1:10	1:10 – 1:7,5	1:7,5 – 1:5	Steeper than 1:5
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#### Alternative S2 (if any):

Flat	1:50 – 1:20 Average	1:20 – 1:15	1:15 – 1:10	1:10 – 1:7,5	1:7,5 – 1:5	Steeper than 1:5
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#### Alternative S3 (if any):

Flat	1:50 – 1:20 Average	1:20 – 1:15	1:15 – 1:10	1:10 – 1:7,5	1:7,5 – 1:5	Steeper than 1:5
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## 2) LOCATION IN LANDSCAPE

Indicate the landform(s) that best describes the site:

2.1 Ridgeline		2.4 Closed valley		2.7 Undulating plain / low hills	
2.2 Plateau		2.5 Open valley		2.8 Dune	
2.3 Side slope of hill/mountain		2.6 Plain	<input checked="" type="checkbox"/>	2.9 Seafront	
2.10 At sea					

## 3) GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE

Is the site(s) located on any of the following?

	Alternative A1		Alternative A2		Alternative A3		Alternative A4	
Shallow water table (less than 1.5m deep)	YES	NO	YES	NO	YES	NO	YES	NO
Dolomite, sinkhole or doline areas	YES	NO	YES	NO	YES	NO	YES	NO
Seasonally wet soils (often close to water bodies)	YES	NO	YES	NO	YES	NO	YES	NO
Unstable rocky slopes or steep slopes with loose soil	YES	NO	YES	NO	YES	NO	YES	NO
Dispersive soils (soils that dissolve in water)	YES	NO	YES	NO	YES	NO	YES	NO
Soils with high clay content (clay fraction more than 40%)	YES	NO	YES	NO	YES	NO	YES	NO
Any other unstable soil or geological feature	YES	NO	YES	NO	YES	NO	YES	NO
An area sensitive to erosion	YES	NO	YES	NO	YES	NO	YES	NO

If you are unsure about any of the above or if you are concerned that any of the above aspects may be an issue of concern in the application, an appropriate specialist should be appointed to assist in the completion of this section. Information in respect of the above will often be available as part of the project information or at the planning sections of local authorities. Where it exists, the 1:50 000 scale Regional Geotechnical Maps prepared by the Council for GeoScience may also be consulted.

## 4) GROUNDCOVER

Indicate the types of groundcover present on the site. The location of all identified rare or endangered species or other elements should be accurately indicated on the site plan(s).

Natural veld – good condition	Natural veld with scattered aliens	Natural veld with a heavy alien infestation	Veld dominated by alien species	Gardens
Sport field	Cultivated land	Paved surface	Building or other structure	Bare soil

Please see Appendix B for Site Photographs and further descriptions of site vegetation.

If any of the boxes marked with an "E" is ticked, please consult an appropriate specialist to assist in the completion of this section if the environmental assessment practitioner doesn't have the necessary expertise.

N/A

## 5) SURFACE WATER

Indicate the surface water present on and or adjacent to the site and alternative sites?

Perennial River	YES	NO	UNSURE
Non-Perennial River	YES	NO	UNSURE
Permanent Wetland	YES	NO	UNSURE
Seasonal Wetland	YES	NO	UNSURE
Artificial Wetland	YES	NO	UNSURE
Estuarine / Lagoonal wetland	YES	NO	UNSURE

If any of the boxes marked YES or UNSURE is ticked, please describe the relevant watercourse.

N/A

## 6) LAND USE CHARACTER OF SURROUNDING AREA

Indicate land uses and/or prominent features that currently occur within a 500m radius of the site and give a description of how this influences the application or may be impacted upon by the application:

<b>Natural area</b>	<b>Dam or reservoir</b>	<b>Polo fields</b>
Low density residential	Hospital/medical centre	Filling station <sup>H,*</sup>
Medium density residential	School	Landfill or waste treatment site
High density residential	Tertiary education facility	Plantation
Informal residential <sup>A</sup>	Church	Agriculture
Retail commercial & warehousing	Old age home	River, stream or wetland
Light industrial	Sewage treatment plant <sup>A</sup>	Nature conservation area
Medium industrial <sup>AN</sup>	Train station or shunting yard <sup>N</sup>	Mountain, koppie or ridge
Heavy industrial <sup>AN</sup>	Railway line	Museum
Power station	Major road (4 lanes or more) <sup>N</sup>	Historical building
Office/consulting room	Airport	Protected Area
Military or police base/station/compound	Harbour	Cemetery
Spoil heap or slimes dam <sup>A</sup>	Sport facilities	Archaeological site
Quarry, sand or borrow pit	Golf course	Other land uses (indigenous vegetation) –

If any of the boxes marked with an "N" are ticked, how this impact will / be impacted upon by the proposed activity? Specify and explain:

N/A

If any of the boxes marked with an "An" are ticked, how will this impact / be impacted upon by the proposed activity? Specify and explain:

N/A

If any of the boxes marked with an "H" are ticked, how will this impact / be impacted upon by the proposed activity? Specify and explain:

N/A

Does the proposed site (including any alternative sites) fall within any of the following:

Critical Biodiversity Area (as per provincial conservation plan)	YES	NO
A core area of a protected area?	YES	NO
A buffer area of a protected area?	YES	NO
The planned expansion area of an existing protected area?	YES	NO
Existing offset area associated with a previous Environmental Authorisation?	YES	NO
A buffer area of the SKA?	YES	NO

If the answer to any of these questions was YES, a map indicating the affected area must be included in Appendix A.



## 7) CULTURAL/HISTORICAL FEATURES

Are there any signs of culturally or historically significant elements, as defined in section 2 of the National Heritage Resources Act, 1999, (Act No. 25 of 1999), including Archaeological or paleontological sites, on or close (within 20m) to the site? If YES, explain:	YES	NO
	Uncertain	

If uncertain, conduct a specialist investigation by a recognised specialist in the field (archaeology or palaeontology) to establish whether there is such a feature(s) present on or close to the site. Briefly explain the findings of the specialist:
N/A

Will any building or structure older than 60 years be affected in any way?	YES	NO
Is it necessary to apply for a permit in terms of the National Heritage Resources Act, 1999 (Act 25 of 1999)?	YES	NO
If YES, please provide proof that this permit application has been submitted to SAHRA or the relevant provincial authority.		

## 8) SOCIO-ECONOMIC CHARACTER

### a) Local Municipality

Please provide details on the socio-economic character of the local municipality in which the proposed site(s) are situated.

To be provided in final BAR
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### b) Socio-economic value of the activity

What is the expected annual turnover to be generated by or as a result of the project?	Approximately R150 000
New skilled employment opportunities created in the <u>construction</u> phase of the project	None. The construction phase will last only four to

	<p>six weeks and this is too short a period to train anybody to become a skilled employee.</p>
<p>New skilled employment opportunities created in the <u>operational</u> phase of the project</p>	<p>None. The proposed development will only support existing employment opportunities for maintenance electricians, radio planners etc.</p>
<p>New un-skilled employment opportunities created in the <u>construction</u> phase of the project</p>	<p>Approximately 10 general labours will be employed</p>
<p>New un-skilled employment opportunities created in the <u>operational</u> phase of the project</p>	<p>It is expected that two employment opportunities will become available for the monthly mowing of grass at the base station and general housekeeping</p>
<p>What is the expected value of the employment opportunities during the operational and construction phase?</p>	<p>Approximately R36 000 per year in total will be spent on service providers that inspect whether the proposed mast and associated infrastructure are providing service in the required manner and whether the structural integrity of the infrastructure is still in order as well as to keep the grass mown and the base station presentable. The work of fixing anything that needs to be fixed at the base station will be done by existing employees of the developer and will therefore not result in any new cost per se.</p>

## 9) BIODIVERSITY

Please note: The Department may request specialist input/studies depending on the nature of the biodiversity occurring on the site and potential impact(s) of the proposed activity/ies. To assist with the identification of the biodiversity occurring on-site and the ecosystem status consult <http://bgis.sanbi.org> or [BGIShelp@sanbi.org](mailto:BGIShelp@sanbi.org). Information is also available on compact disc (cd) from the Biodiversity-GIS Unit, Ph (021) 799 8698. This information may be updated from time to time and it is the applicant/ EAP's responsibility to ensure that the latest version is used. A map of the relevant biodiversity information (including an indication of the habitat conditions as per (b) below) and must be provided as an overlay map to the property/site plan as Appendix D to this report.

- a) Indicate the applicable biodiversity planning categories of all areas on-site and indicate the reason(s) provided in the biodiversity plan for the selection of the specific area as part of the specific category)

Systematic Biodiversity Planning Category				If CBA or ESA, indicate the reason(s) for its selection in biodiversity plan
Critical Biodiversity Area (CBA)	Ecological Support Area (ESA)	Other Natural Area (ONA)	No Natural Area Remaining (NNR)	

- b) Indicate and describe the habitat condition on site (will be described once assessments have been received)

Habitat Condition	Percentage of habitat condition class (adding up to 100%)	Description and additional Comments and Observations (including additional insight into the condition, e.g. poor land management practices, presence of quarries, grazing, harvesting regimes etc).
Natural		
Near Natural (includes areas with low to moderate levels of alien invasive plants)	≈10%	
Degraded (includes areas heavily invaded by alien plants)		
Transformed (includes cultivation, dams, urban, plantation, roads, etc)	≈90%	The proposed site is an approximately 100m <sup>2</sup> area located within a frequently ploughed and planted sugarcane field.

- c) Complete the table to indicate:

- (i) the type of vegetation, including its ecosystem status, present on the site; and
- (ii) whether an aquatic ecosystem is present on site.

Terrestrial Ecosystems		Aquatic Ecosystems		
Ecosystem threat status as per the National	Critical	Wetland (including rivers, depressions, channelled and unchannelled wetlands, flats,	Estuary	Coastline
	Endangered			
	Vulnerable			

<b>Environmental Management: Biodiversity Act (Act No. 10 of 2004)</b>	<b>Least Threatened</b>	<b>seeps pans, and artificial wetlands)</b>						
		<b>YES</b>	<b>NO</b>	<b>UNSURE</b>	<b>YES</b>	<b>NO</b>	<b>YES</b>	<b>NO</b>

- d) Please describe the vegetation type and/or aquatic ecosystem present on-site, including any important biodiversity features/information identified on-site (e.g. threatened species and special habitats)

<p><b><u>Vegetation</u></b></p> <p>The proposed site is located within an active sugarcane field and is therefore devoid of indigenous vegetation and any potential impacts that would be associated with indigenous vegetation as a habitat.</p> <p><b><u>Aquatic ecosystems</u></b></p> <p>No watercourse exists on the proposed site within close proximity to the proposed site.</p>
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## SECTION C: PUBLIC PARTICIPATION

### 1) ADVERTISEMENT AND NOTICE

Publication name	South Coast Herald
Date published	30 September 2022
Site notice position	
Immediately next to the road that goes past the proposed site	
Approximately 670m upslope along the road that passes the proposed site	
Approximately 600m downslope along the road that passes next to the proposed site	
Offices of the Umdoni Local Municipality	
<b>Date placed:</b> 03 October 2022	

Include proof of the placement of the relevant advertisements and notices (Refer to Appendix E1).

### 2) DETERMINATION OF APPROPRIATE MEASURES

Provide details of the measures taken to include all potential I&APs as required by Regulation 41(2)(e) and 41(6) of GN 733.

#### Pre-application PPP (Refer to Appendix E)

- An advertisement was placed in a local newspaper (*The South Coast Herald*) which was published on 30 September 2022. Refer to Appendix E1.
- Adjacent landowners/ occupiers were notified via letter drops on 03 October 2022.
- An initial register of possible interested and affected parties was compiled (Refer to Appendix E)
- A site visit was conducted on 03 October 2022 to familiarise with the proposed site and nearby surrounding area and identify environmental sensitivities associated with the proposed site.
- A Comments and Response Report (C&R Report) has been compiled to address comments received during the initial stage of public participation (Refer to Appendix E).

Key stakeholders (other than organs of state) identified in terms of Regulation 41(2)(b) of GN 733

Title, Name and Surname	Affiliation/ key stakeholder status	Contact details (Tel. number or e-mail address)
Mr and Mrs Salatchiammal Govender	Landowner	Tel.: 083 263 3224 Email: Sid.vani.govender@gmail.com

Include proof that the key stakeholder received written notification of the proposed activities (Appendix E2).

This proof may include any of the following:

- e-mail delivery reports;
- registered mail receipts;

- courier waybills;
- signed acknowledgements of receipt; and/or
- or any other proof as agreed upon with the competent authority.

### 3) ISSUES RAISED BY INTERESTED AND AFFECTED PARTIES (Please See Appendix E)

Summary of main issues raised by I&APs	Summary of response from EAP
The competent authority requested in a pre-application meeting that a Biodiversity Impact Assessment and a Visual Impact Assessment be conducted	The required specialist professionals were appointed and the specialist reports have been attached hereto as appendices.

### 4) COMMENTS AND RESPONSES REPORT

The practitioner must record all comments received from I&APs and respond to each comment before the BAR is submitted. The comments and responses must be captured in a comments and response report as prescribed in the EIA regulations and be attached to the BAR as Appendix E3.

**Please refer to Appendix E3 for the comments and response report.**

### 5) AUTHORITY PARTICIPATION

Authorities and organs of state identified as key stakeholders:

Authority/Organ of State	Contact person (Title, Name and Surname)	Tel No	Fax No	e-mail	Postal address
<b>Please refer to Appendix E</b>					

Include proof that the Authorities and Organs of State received written notification of the proposed activities as appendix E4.

In the case of renewable energy projects, Eskom and the SKA Project Office must be included in the list of Organs of State.

### 6) CONSULTATION WITH OTHER STAKEHOLDERS

Note that, for any activities (linear or other) where deviation from the public participation requirements may be appropriate, the person conducting the public participation process may deviate from the requirements of that sub-regulation to the extent and in the manner as may be agreed to by the competent authority.

Proof of any such agreement must be provided, where applicable. Application for any deviation from the regulations relating to the public participation process must be submitted before the commencement of the public participation process.

A list of registered I&APs must be included in Appendix E5.

Copies of any correspondence and minutes of any meetings held must be included in Appendix E6.

## SECTION D: IMPACT ASSESSMENT

The assessment of impacts must adhere to the minimum requirements in the EIA Regulations, 2014 and should take applicable official guidelines into account. The issues raised by interested and affected parties should also be addressed in the assessment of impacts.

### 1) IMPACTS THAT MAY RESULT FROM THE PLANNING AND DESIGN, CONSTRUCTION, OPERATIONAL, DECOMMISSIONING AND CLOSURE PHASES AS WELL AS PROPOSED MANAGEMENT OF IDENTIFIED IMPACTS AND PROPOSED MITIGATION MEASURES

Provide a summary and anticipated significance of the potential direct, indirect and cumulative impacts that are likely to occur as a result of the planning and design phase, construction phase, operational phase, decommissioning and closure phase, including impacts relating to the choice of site/activity/technology alternatives as well as the mitigation measures that may eliminate or reduce the potential impacts listed. This impact assessment must be applied to all the identified alternatives to the activities identified in Section A(2) of this report.

**Please see Appendix F for Impact Assessment and Scoring Matrix.**

Activity	Impact summary	Significance	Proposed mitigation
<b>Alternative 1 (preferred alternative)</b>			
Geographic and physical	<b>Direct impacts:</b>	Low negative	<ul style="list-style-type: none"> <li>- Implement EMP;</li> <li>- Minimise development footprint;</li> <li>- ECO monitoring;</li> <li>- Waste management.</li> <li>- Limit construction work to normal working hours</li> </ul>
	<b>Indirect impacts:</b>	Low negative	
	<b>Cumulative impacts: After mitigation</b>	Low negative	
Biological: (vegetation, protected species, CBAs,)	<b>Direct impacts:</b>	Low negative	<ul style="list-style-type: none"> <li>- The establishment of the proposed telecommunications mast and associated infrastructure will remain compliant with an Environmental Management Programme (EMPr) approved by the competent authority.</li> <li>- A suitably qualified Environmental Control Officer must be appointed to help ensure that the work of establishing the proposed development remains compliant with the environmental authorisation and approved EMPr.</li> <li>- All working areas must remain within the limits of the sugarcane field on which the proposed site is located.</li> <li>- All waste must be removed from the proposed site to a municipal approved waste disposal site.</li> <li>- An integrated waste management approach must be implemented during construction. All construction-related waste must be disposed of at an approved municipal waste disposal site.</li> </ul>
	<b>Indirect impacts:</b>	Low negative	
	<b>Cumulative impacts: After mitigation</b>	Low negative	
Sewage Management	<b>Direct impacts:</b>	Low negative	A portable toilet must be provided to construction workers during the construction phase and the sewage collected and disposed of at a licensed wastewater treatment works at least once a week.
	<b>Indirect impacts:</b>	Low negative	
	<b>Cumulative impacts: After mitigation</b>	Low negative	
Watercourse	<b>Direct impacts:</b>	N/A	

Activity	Impact summary	Significance	Proposed mitigation
<b>Alternative 1 (preferred alternative)</b>			
	<b>Indirect impacts:</b>	N/A	
	<b>Cumulative impacts:</b> <i>After mitigation</i>	N/A	
Socio-economic	<b>Direct impacts:</b>	Medium positive	- The proposed establishment of a telecommunications mast and associated infrastructure on the proposed site will create some employment opportunities. Please refer to the socio-economic information provided on Page 22 and 23.
	<b>Indirect impacts:</b>	Medium positive	
	<b>Cumulative impacts:</b> <i>After mitigation</i>	Medium positive	
Cultural-Historical	<b>Direct impacts:</b>	N/A	No heritage features of any significance were identified on the proposed site. Please refer to Appendix D4
	<b>Indirect impacts:</b>	N/A	
	<b>Cumulative impacts:</b> <i>After mitigation</i>	N/A	
Noise impact	<b>Direct impacts:</b>	Low	Any noise generated by the proposed development will be a temporary impact and the noise of the operational phase should remain as is currently the case. The following mitigation measures will be implemented:  <ul style="list-style-type: none"> <li>- A complaints register will be maintained on-site. Any complaints received will be responded to and rectified accordingly. The ECO must be notified of any complaints;</li> <li>- Working hours must be strictly limited to standard daylight working hours (08h00-17h00)</li> </ul>
	<b>Indirect impacts:</b>	N/A	
	<b>Cumulative impacts:</b> <i>After mitigation</i>	N/A	
Visual impact	<b>Direct impacts:</b>	Moderate-low	The mitigation measures recommended in the visual impact assessment report attached hereto as Appendix D2 will be implemented to help ensure that the visual impact is kept moderate-low.
	<b>Indirect impacts:</b>	Moderate-low	
	<b>Cumulative impacts:</b> <i>After mitigation</i>	Moderate-low	
	<b>Indirect impacts:</b>	N/A	
	<b>Cumulative impacts:</b> <i>After mitigation</i>	N/A	
<b>No-go option</b>			
The "No-Go" option: Potential impact associated with the No-Go alternative.	<b>Direct impacts:</b>	High negative	-The currently inadequate telecommunications coverage available on the northern outskirts of Umzinto causes voice calls to be dropped before conversations have been completed. Data calls are dropped in the same way or customers must endure a lag during their conversations. This can cause loss of life or damage to property when calls involve requests for the provision of emergency responses by the police, ambulances fire
	<b>Indirect impacts:</b>	High negative	
	<b>Cumulative impacts:</b> <i>After mitigation</i>	High negative	



Activity	Impact summary	Significance	Proposed mitigation
<b>Alternative 1 (preferred alternative)</b>			
			<p>brigade etc. Nowadays, conducting business and even maintaining social relations between family members and friends and other people requires that adequate telecommunications coverage be provided so that internet connectivity can be sufficiently fast and so that calls can be made without being dropped before being completed as a result of inadequate telecommunications coverage.</p> <p>It would therefore be highly undesirable for the 'no-go' alternative to be adopted, when the competent authority can authorise the application only moderate to low negative impacts resulting.</p>

**A complete impact assessment in terms of Regulation 19(3) of GN 733 must be included as Appendix F.**

## **2) ENVIRONMENTAL IMPACT STATEMENT**

Taking the assessment of potential impacts into account, please provide an environmental impact statement that summarises the impact that the proposed activity and its alternatives may have on the environment after the management and mitigation of impacts have been taken into account, with specific reference to types of impact, duration of impacts, likelihood of potential impacts occurring and the significance of impacts.

**Please refer to Appendix F for the full Impact Assessment and proposed Mitigation Measures.**

### **Proposed telecommunications mast and associated infrastructure on Erf 33, Umzinto North**

The proposal is to establish a telecommunications mast and associated infrastructure on Erf 33, Umzinto North. The telecommunications mast and associated infrastructure will augment the inadequate telecommunications coverage on the northern outskirts of Umzinto so that the current problem of voice calls and data calls being dropped before the calls have been completed and the other related telecommunications service provision problems can be alleviated.

The augmented coverage that will become available to telecommunications network users in Umzinto North will help to limit loss of lives and damage to property when calls requesting emergency services are made. Considering that nowadays, adequate internet connectivity is essential for many businesses transactions to take place and for accessing social media to maintain good social relations with family and friends and other people, the positive impacts envisaged as a result of the proposed development are major.

On the other hand, the negative impacts of the proposed development range from moderate for the visual impact to low for almost all other impacts, as the proposed development will take up a small area of approximately 100m<sup>2</sup> within an active sugarcane field. The impacts will be kept minimal though the implementation of the EMPr and the implementation of the mitigation measures recommended in the specialist assessment reports attached hereto.

In light of the above, it is advisable that the proposed development be authorised by the competent authority.

### **No-go alternative (compulsory)**

The 'no-go' alternative entails keeping the current situation of inadequate telecommunications coverage on the northern outskirts of Umzinto unchanged. This means that the troubling manner in which voice calls and data calls are currently dropped before calls can be completed will continue.

This situation will continue even when calls are made to the police, ambulances or fire brigade in order to prevent loss of lives or prevent damage to property. Considering that internet connectivity has become essential for many business transactions nowadays, the poor telecommunications coverage will also continue to hinder many business transactions and will also make it difficult for people to maintain good social relations with family and friends through social media and phone calls.

The adoption of the 'no-go' alternative would therefore result in highly undesirable consequences that outweigh any advantages that might exist, particularly when the preferred alternative is not associated with any moderate to low environmental impacts.

### **Upington Crematorium Alternative**

#### **SITE ALTERNATIVES**

Erf 33, Umzinto North is the only site alternative considered and this is a result of the following:

1. **Location of the proposed site:** the proposed site is located within an active sugarcane field and therefore only moderate to low environmental impacts are envisaged for the proposed development, while the telecommunications coverage that will become available in Umzinto North as a result of the proposed development will significantly alleviate the current shortfalls of telecommunications coverage in the area. In addition, the location of the proposed is not within 1km of any other telecommunications masts and therefore the proposed development will not cause a cluttering of telecommunication masts in the area.

**No-go alternative (compulsory)**

The 'no-go' alternative entails keeping the current situation of inadequate telecommunications coverage on the northern outskirts of Umzinto unchanged. This means that the troubling manner in which voice calls and data calls are currently dropped before calls can be completed in Umzinto North will continue.

This will continue to be the case even when calls are made to the police, ambulances or fire brigade to request assistance in order to prevent loss of lives and to prevent damage to property. Considering that internet connectivity has become essential for many business transactions nowadays, the poor telecommunications coverage will also continue to hinder many business transactions and will also make it difficult for people to maintain good social relations with family and friends through social media and phone calls.

The 'no-go' alternative would therefore result in highly undesirable consequences that outweigh any advantages that might exist, particularly when the preferred alternative is not associated with any moderate to low environmental impacts. The 'no-go' alternative should therefore be discarded.

## SECTION E. RECOMMENDATION OF EAP

Is the information contained in this report and the documentation attached hereto sufficient to decide in respect of the activity applied for (in the view of the environmental assessment practitioner)?	YES	NO
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If "NO", indicate the aspects that should be assessed further as part of a Scoping and EIA process before a decision can be made (list the aspects that require a further assessment).

The Draft BAR must first be made available to Interested and Affected Parties for public participation as per the EIA Regulations of 2014 (as amended) before the final report can be submitted for a decision on the application.

If "YES", please list any recommended conditions, including mitigation measures that should be considered for inclusion in any authorisation that may be granted by the competent authority in respect of the application.

<b>Recommended conditions</b>		
<ul style="list-style-type: none"> <li>• All construction must take place in accordance with an approved construction and operational phase Environmental Management Programme (EMPr).</li> <li>• A suitably experienced ECO must be appointed to ensure compliance with the conditions of the Environmental Authorization and the EMPr.</li> <li>• Construction work must be strictly limited to working hours to minimise the possibility of noise disturbance.</li> <li>• Lay-down areas must be confined to within the active sugar existing field where the proposed site is located.</li> <li>• Waste material on site must be removed and disposed of at a lawful municipal waste disposal facility.</li> </ul>		
Is an EMPr attached?	YES	NO


The EMPr must be attached as Appendix G.

The details of the EAP who compiled the BAR and the expertise of the EAP to perform the Basic Assessment process must be included in Appendix H.

If any specialist reports were used during the compilation of this BAR, please attach the declaration of interest for each specialist in Appendix I.

Any other information relevant to this application and not previously included must be attached in Appendix J.

Bernard de Witt  
NAME OF EAP



\_\_\_\_\_  
SIGNATURE OF EAP

\_\_11/04/2023\_\_  
DATE

## **SECTION F: APPENDICES**

The following appendices are attached:

### **APPENDIX A: MAPS**

### **APPENDIX B: SITE PHOTOGRAPHS**

### **APPENDIX C: FACILITY ILLUSTRATION**

### **APPENDIX D: SPECIALIST REPORTS**

N/A

### **APPENDIX E: PUBLIC PARTICIPATION**

APPENDIX E1: PROOF OF ADVERTISEMENT AND NOTICES

APPENDIX E2: COMMENTS AND RESPONSES

APPENDIX E3: I&AP REGISTER

### **APPENDIX F: IMPACT ASSESSMENT AND SCORING MATRIX**

### **APPENDIX G: ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPr)**

### **APPENDIX H: DETAILS OF EAP AND EXPERTISE**