



## ENVIRONMENTAL CONSULTING

DEA&DP Reference	16/3/3/6/7/2/A4/37/3181/21	SEC Reference	020052	Date	22.09.2021
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Department of Environmental Affairs and Development Planning  
1 Dorp street  
Cape Town  
8000

**Attention:** To whom it may concern

### **THE PROPOSED HOUSING DEVELOPMENT ON ERF RE/18370 AND ERF RE/18332, KHAYELITSHA, CITY OF CAPE TOWN, WESTERN CAPE**

**SEC PROJECT NUMBER: 020052**

#### **Introduction**

SEC has been appointed by City of Cape Town: Human Settlements to undertake the necessary environmental application in terms of the National Environmental Management Act No. 107 of 1998 for the proposed Enkanini residential development, Erf , RE/18370 and Erf Re/18332, Khayelitsha, City of Cape.

The proposed residential development will be located on Erf , RE/18370 and Erf Re/18332, measuring approximately 100.38ha in extent. The site is located within the Cape Flats area along the False Bay coastline, with Baden Powell Drive to the south, Oscar Mpetha Road to the west and Mew Way to the north and east.

The current appointment includes the provision of services up to land use approval and is limited to conceptual design phase and civil and electrical design.

It has been ascertained that Scoping/EIA Application in terms of the Listing Notice 2 of the NEMA EIA Regulations 2014 (as amended) must be followed and submitted to the DEA&DP for their final decision.

#### **Project description**

The proposed residential development will be located on Erf , RE/18370 and Erf Re/18332, measuring approximately 100.38ha in extent. The site is located within the Cape Flats area along the False Bay coastline, with Baden Powell Drive to the south, Oscar Mpetha Road to the west and Mew Way to the north and east.

The development aims to provide for approximately 5800 serviced sites with the associated educational, community and commercial uses.

#### **Legal Framework**

Upon consultation with the NEMA EIA Regulations, 2014 (as amended) as well as consultation with the DEA&DP, it has been ascertained that Scoping/EIA Application in terms

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of the Listing Notice 2 of the NEMA EIA Regulations 2017 must be followed and submitted to the DEA&DP for their final decision.

## Legislative Requirements

The Scoping/EIA process to be followed is defined by the EIA Regulations contained in Government Notice No. R.326. These Regulations are published in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended.

One of the requirements of the EIA Regulations (please refer to Appendix 2 (1) (h) of the NEMA EIA Regulations, 2014 (as amended) is that a Plan of Study for Environmental Impact Assessment must be submitted to the Competent Authority along with the Final Scoping Report. The Competent Authority will then review the Plan of Study and decide whether the tasks, approach and methodology proposed for the EIA phase will be able to provide an effective assessment of the impacts identified as potentially significant during the Scoping phase.

In accordance with the EIA Regulations, this Plan of Study provides a description of the tasks to be undertaken during the EIA phase, including any specialist input, and how these tasks will be undertaken; the stages at which the Competent Authority will be consulted; the proposed assessment methodology to be used; particulars of the EIA phase public participation process; and any specific information requested by the Competent Authority,

These are now discussed further.

### **i A description of alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity**

The NEMA EIA Regulations, 2014 (as amended) require that a “*description of any feasible and reasonable alternatives identified*” must be provided.

‘Alternatives’ is defined by NEMA as the following:

“*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* be used in the activity;
- e) The *operational* aspects of the activity; and
- f) The option of not implementing the activity.

Point (f) above requires that the “no-go” alternative must also be assessed.



The Environmental Assessment Practitioner, in conjunction with specialist input, has identified the following alternatives for the proposed development that will be assessed in detail in the EIA phase:

### **LAYOUT/DESIGN ALTERNATIVES**

#### **ALTERNATIVE 1: First draft concept block layout (no sensitive area)**

This alternative was the initial concept block layout plan proposing development for the entire subject property, excluding the ~~not including any sensitive~~ Biodiversity Management Branch area. As this plan was conceptual the areas and numbers are only estimated.

The number of residential units for this layout is proposed to be approximately 3500 units which gives a gross density of 68 units per hectare.

#### **ALTERNATIVE 2: Second draft concept block layout (excluding the no-go sensitive area)**

This alternative is a concept block layout plan proposing development for the entire subject property excluding the entire no-go sensitive area as earmarked by the botanist towards the east of the site of approximately 9,6 ha leaving a developable area of 90.7 ha. As this plan was conceptual the areas and numbers are only estimated.

The number of residential erven for this alternative is proposed to be approximately 5130 units which gives a gross density of 57 units per hectare.

#### **ALTERNATIVE 3 (Current proposed Preferred Alternative): Excluding the no go area and including a proposed offset area**

Given the current extent of illegal land occupation taking place on site, the dire need for housing in the country and the complications associated with successfully cordoning off and protecting sections of no go areas in the long term; it was recommended that an offset be identified for the sensitive areas identified on site and that the no-go buffer area towards the eastern boundary of the site are no longer required. The layout was thus revised to include the area previously excluded; thus the entire subject property area is now available for urban development.

The total amount of residential erven proposed for this layout is 5700 units on a 100.38ha area. This amounts to a gross density of 57 units per hectare.

#### **No-Go Alternative**

The no-go option entails the maintaining of the status quo of the site. In this case, the no-go option would mean that the development will not take place and that there will consequently be no clearance of vegetation for the sake of development.

The site will remain as is, undeveloped

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The no-go alternative will fail to address the dire need for housing in the Cape Flats area – as well as larger City of Cape Town area.

Given the scale of the proposed housing development, a considerable economic contribution to the local community in the form of employment opportunities will also be foregone should the development not take place.

Should the property remain vacant it will also most likely be completely occupied and degraded by illegal land invasion thereby compromising the safety and environmental quality of the area.

**ii A description of the aspects to be assessed as part of the environmental impact assessment process;**

The following aspects will be assessed as part of the EIA phase:

**iii Aspects to be assessed by specialists**

- The botanical aspects will be assessed by Paul Emms
- The freshwater impacts, more specifically the possible impacts on wetlands, will be assessed by Dean Ollis
- Offset specialists Amrei von Hase and Susie Brownlie will be looking at identifying and formalising an offset as mitigation for ecosystem loss
- The social impacts will be assessed by SEC in consultation with the social facilitators on the project team
- Traffic Impacts will be assessed by the traffic engineers
- Stormwater impacts will be assessed by the engineers
- Impacts on service availability will be assessed by the engineers

**iv A description of the proposed method of assessing the environmental aspects, including aspects to be assessed by the specialists**

Impacts are changes in an environmental parameter that result from undertaking an activity. Identified impacts will be assessed in relation to the existing receiving environment. Consideration will be given to direct and indirect impacts as well as cumulative impacts associated with the development.

The following impacts will be assessed during the EIA Phase:

- The botanical impact of this permanent loss of endangered vegetation.
- The impacts of the development, if any, on the wetlands present within the dune slack area just outside of the property, will be assessed by Ollis during the EIA phase.

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- Offset specialists Amrei von Hase and Susie Brownlie will be looking at identifying and formalising an offset as mitigation for ecosystem loss
- Social impacts associated with the development will be assessed in detail in the EIA Phase these include:
  - o Any nuisance impacts such as dust, noise and traffic on the public during construction phase
  - o Any nuisance impacts such as noise and traffic on the public during the operational phase
  - o The positive socio-economic impact the development will have on the community in the form of housing provision, job creation and the provision of community services such as schools, medical services etc.
- Traffic impacts associated with the development relating to the access to the development, internal roads, parking, additional traffic generated etc.
- Stormwater impacts associated with the development

Phase 1 will include identification of environmental impacts, and Phase 2 the assessment of environmental impacts. Phase 3 will involve the identification of mitigation measures to avoid, minimise or offset environmental impacts.

### Phase 1: Impact Identification

The potential environmental impacts of the proposed activity have been identified during the scoping phase. These impacts have been identified based on the following:

- Inspection of the site and surroundings (current environmental conditions).
- Discussions with members of the project team (SEC, applicant, professional team and input from specialists).
- Discussions with relevant authorities (Western Cape DEA&DP and other relevant state departments).
- Review of spatial information including maps and design parameter alternatives.
- Issues and concerns that are raised during the public participation process.
- Determining any changes to the receiving environment as a result of the proposed development.

### Phase 2: Impact prediction and assessment

The objective of assessing the impacts is to determine whether the activity and any alternatives identified as reasonable or feasible for meeting the purposes of the application, are environmentally sustainable (i.e. any trade-offs between biophysical, social and economic environmental impacts are acceptable; and any environmental impacts do not threaten the ability of the biophysical receiving environment to regenerate and thus function sustainably).

The assessment of impacts will include (amongst others):

- Identifying and assessing the potential impacts associated with the activity and its alternatives

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- Predicting the nature, magnitude, extent and duration of potentially significant impacts.
- Identifying the timing of the impact that is, during construction, operation and/or decommissioning
- The extent to which the impact can be reversed or not
- The extent to which the impact can be mitigated (avoided; minimised; or offset)
- The likelihood or probability of the impact actually occurring; and
- The significance of the impact.

The methods used to predict, assess and rank the characteristics of impacts will include the following:

- Professional judgement.
- Case studies and/or past experience.
- Specialist studies.
- I&APs comments and concerns.

### **Phase 3: Mitigation**

A number of mitigation measures will be provided for each of the impacts identified. Mitigation measures proposed by any specialists will be taken into consideration in order to avoid, minimise or offset potential negative impacts, as well as maximise potential positive impacts.

### **Phase 4: Reporting**

An Environmental Impact Assessment Report and Environmental Management Plan (EMP) will be prepared in terms of *Appendix 4 of GN No. R.982, EIA Regulations, 2014 (as amended)*. The ensuing Draft EIA Report and EMP will be submitted to registered I&APs for comment (see *point iv* below).

### **v A description of the proposed method of assessing duration and significance Evaluating Identified Impacts**

The following table will be utilised in the assessment of identified impacts. The assessment criteria and rating categories are derived from the DEA's *Guideline Document: EIA Regulations: Implementation of Sections 21 22 And 26 of the Environment Conservation Act, April 1998*.

**Table 1: Impact Evaluation Table**

Item	Definition
<b>Extent</b>	
Local	Extending only as far as the boundaries of the activity, limited to the site and its immediate surroundings
Regional	Impact on the broader region
National	Will have an impact on a national scale or across international borders
<b>Duration</b>	
Short-term	0-5 years
Medium term	5-15 years
Long -Term	>15 years, where the impact will cease after the operational life of the activity
Permanent	Where mitigation, either by natural process or human intervention, will not occur in such a way or in such a time span that the impact can be considered transient.
<b>Magnitude/Intensity</b>	
Low	Where the impact affects the environment in such a way that natural, cultural and social functions and processes are not affected.
Medium	Where the affected environment is altered but natural, cultural or social functions and processes continue, albeit in a modified way.
High	Where natural, cultural or social functions or processes are altered to the extent that they will temporarily or permanently cease.
<b>Probability</b>	
Improbable	Where the possibility of the impact materialising is very low, either because of design or historic experience
Probable	Where there is a distinct possibility that the impact will occur
Highly Probable	Where it is most likely that the impact will occur
Definite	Where the impact will undoubtedly occur, regardless of any prevention measures





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Significance	
Low	Where a potential impact will not have an influence on the project and will not require special design considerations for the project
Medium	Where a potential impact could influence the project and will require modification or mitigation measures to be included in the design
High	Where the environmental impacts are so high that it could result in the project being environmentally unacceptable, even with mitigation
Status of Impact	
Whether the impact is positive (a benefit), negative (a cost) or neutral	
Degree of Confidence in Predictions	
The degree of confidence in the predictions is based on the availability of information and specialist knowledge	
Mitigation	
Mechanisms used to minimise or eliminate negative impacts on the environment and to enhance project benefits	

### Ranking of Identified Impacts

The following table will be used in order to allow for ranking of the identified impacts, a scoring system has been used which creates values for each of the impact parameters. These will be totalled and the impact with the highest total will be ranked the most significant. This is detailed in the table below.

**Table 2: Impact Ranking Table**

Impact Parameter – Consider with and without mitigation (two values per impact)				
Extent	Rating	With Mitigation	Without Mitigation	Comments
Local	1			
Regional	2			
National	3			
Duration	Rating			
Short term	1			
Medium Term	2			
Long Term	3			
Permanent	4			
Magnitude/Intensity	Rating			
Low	1			
Medium	2			
High	3			
Probability	Rating			
Improbable	1			
Probable	2			
Highly Probable	3			
Definite	4			
Significance	Rating			
Low	1			





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Medium	2			
High	3			
<b>Stakeholder Concern</b>	<b>Rating</b>			
Value multiplied by number of times issue raised by I&AP's	4			
<b>Specialist Impact Identified</b>	<b>Rating</b>			
	1			
<b>Total Value</b>				

### vi An indication of stages at which the competent authority will be consulted

Communication with the DEA&DP will be conducted at the following stages:

- Submission of an Application Form for Environmental Authorisation
- Submission of the Draft Scoping Report prior to distribution to registered I&APs for review
- Submission of the Final Scoping Report and Plan of Study for EIA for acceptance.
- Submission of the Draft EIA Report prior to distribution to registered I&APs for review
- Submission of the Final EIA Report for decision-making purposes.

Please note that on-going communication will be maintained with the DEA&DP in order to ensure that regulatory and/or procedural requirements are being met in the EIA process.

### vii Particulars of the public participation process that will be conducted during the environmental impact assessment process

#### (a) Submission of Draft EIA Report to registered I&APs

In accordance with Chapter 6 of the NEMA EIA Regulations, 2014 (as amended) all registered I&APs will be provided the opportunity to comment on the Draft EIA Report and EMP. All documentation will be available on our website ([www.environmentalconsultants.co.za](http://www.environmentalconsultants.co.za)) and a hardcopy at the Athlone Public Library for review.

#### (b) Public meetings/focus group meetings

SEC does not anticipate the need for public meetings/focus group meetings. However, these will be conducted depending on the level of public sensitivity (during the Draft EIA phase). It is



anticipated that if required, meetings will be held with small, focused groups in order to resolve and address issues and objections efficiently.

**(c) Consultation with key stakeholders (authorities)**

A copy of the Draft EIA Report and supporting documentation will be made available to the following authorities for comment (either in hardcopy or compact disk, depending on the preferred choice of authorities):

- The City of Cape Town.
- The Department of Water Affairs.
- DEA&DP: Land Management
- Cape Nature
- SANRAL
- The Western Cape Department of Education
- The Western Cape Department of Health
- The Western Cape Department of Transport and Public Works
- The Western Cape Department of Environmental Affairs and Development Planning: Pollution and Chemicals Management

All commenting authorities will be provided with a **30-day comment period** in which to comment on the proposed activity. Comments received from these authorities will be submitted to the DEA&DP.

**(d) Submission of Final EIA Report to registered I&APs**

A copy of the Final EIA Report, including a Comments and Responses Report, will similarly be distributed to registered I&APs for review prior to final submission to the DEA&DP.

The Comments and Responses Report will provide a summary of the key issues and areas of concern raised during public participation on the Draft EIA Report, as well as contain copies of all comments received from registered I&APs to date. The Final EIA Report and EMP will also contain additions or amendments where necessary based on I&AP feedback on the reports.

The final public participation period will be a **30-day comment period**.

**viii A description of the tasks that will be undertaken as part of the environmental impact assessment process**

**(a) Review of existing information**

This will involve a desktop review of existing data and information (such as aerial maps; site plans; process engineering information). This phase will include a situational (evaluation of current information) and a needs analysis (evaluation of information which may be required).

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SEC has visited the site a few times before to conduct the pre-feasibility assessment. This has enabled SEC to (1) gain a better understanding of the probable impacts and aspects of the activities on site and, (2) determine any likely development opportunities and constraints associated with the site.

This will be used as a benchmark to assess the activities at the site. Please note that this has been done as part of the Scoping Report, which focused on issues and impacts explicitly related to the site.

### **(b) Specialist study**

Based on the initial assessment of the development and a history of the site; the experience of the project team (SEC, project manager and input from specialists) as well as various meetings held with the provincial Department of Environmental Affairs and Development Planning, the following specialist input will be utilised to inform the EIA phase of the application:

#### A Botanical Impact Assessment:

The study area contains Cape Flats Dune Strandveld, an Endangered vegetation type. Over half of the study area has been disturbed and at least half has been lost to the establishment of informal housing (Highly degraded habitat). Other areas have been disturbed by dumping, sand mining, animals grazing and most significantly clearing of vegetation for housing.. These areas are Degraded but have good rehabilitation potential and are of Medium sensitivity. There are two large areas within the site that contain Semi-intact vegetation. However, these areas are still under pressure from further illegal occupation. These areas are in a conservation-worthy condition and have High sensitivity.

Under other circumstances, any of the Medium or High sensitivity areas at this site would be No-Go areas. However, given the nature of the illegal land occupation and the projected future scenario of further occupation, mitigation options for the site are very limited. A 15 m buffer along the north edge of Baden Powell Drive/south edge of the development is proposed as a buffer for the vegetation to the south of the road. However, this may not be practically feasible to implement or maintain.

Given that the both the No-Go scenario and the development scenario are likely to result in the loss of almost all the vegetation on the site and result in a High or Very high negative impact, the development scenario and associated offset are supported. The exclusion of the buffer area from the development footprint and an offset for the remaining area lost are seen as the best-case scenario from a botanical perspective.

#### A Freshwater Assessment:

The May 2021 freshwater site scan by the Freshwater Consulting Group (FCG) concluded that all the areas mapped as wetlands fall outside of the site area with the exception of an artificial wetland on the eastern border of the site, which is due to the clearing activities that took place as part of the establishment of the Temporary Relocation Area. (Refer to Section /// for details on the TRA)



An existing storm water polishing pond/wetland of the CoCT Water & Sanitation directorate have however been identified on the site, which is included as part of this development but will not be developed and only formalised as a Utility zoned area.

A full freshwater impact assessment as well as a Water Use License application will be commissioned in order to assess the impacts the development will have on these wetland systems and in order to obtain the necessary licensing from the Department of Water Affairs and Sanitation.

The freshwater impact assessment will be included in the EIA phase.

### **Biodiversity Offset Investigation**

As already stated within the botanical screening report, desktop information (e.g. the City's biodiversity GIS layers) shows that Cape Flats Dune Strandveld (CFDS) occurs on the proposed development sites. This vegetation type is listed as Endangered under Criterion B1 and B2 in the 2018 National Biodiversity Assessment (NBA) and is important for its threatened plant species associations. The affected vegetation on erf 18332 has been mapped as 'unselected' CFDS in the City's 'Southeast Strandveld Conservation Implementation Plan' (CIP1). On erf 18370, a portion of the vegetation is mapped as 'unselected' strandveld while a large portion in the west of the site is mapped as 'priority' CFDS.

There have been several discussions and exchanges between the City's Human Settlements (HS) Department, which is the project proponent, the City's Biodiversity Management Branch (BMB) and Sillito Environmental Consulting with respect to the location of the sites, their conservation significance, the relevance of the CIP in this context and the likely requirements for environmental authorization, including biodiversity offsets (Refer to email correspondence dated 29 May 2020 and subsequent correspondence dated 9 November 2020, as included in Appendix F).

Initially, the Enkanini housing development was planned to affect only areas of 'unselected' strandveld, as the adjacent area of 'priority' strandveld to the west was intended for formal protection and inclusion into the City's conservation estate. However, a sudden, very recent increase in the level of land invasion and informal settlement on this priority area has led to the BMB withdrawing its application to have the area reserved for biodiversity management purposes (refer to email by Clifford Dorse dated 6

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October 2020, as included in Appendix F), potentially freeing it up for housing development.

Based on the information above, a biodiversity offset will be required for the predicted residual loss of CFDS vegetation on the development sites, which are owned by the CCT. Where the affected vegetation is mapped as 'unselected' strandveld in the CIP, a streamlined process is suggested by City officials whereby offset requirements are met through the use of the Macassar Dunes East Conservation Landbank (Oxtoby, Dorse & Wood, 2019). Land for this conservation bank has been reserved for conservation (i.e. it has been vested in the City's Biodiversity Management Branch) and the BMB plans to apply for its declaration as a S 23 Nature Reserve in terms of the NEM Protected Areas Act.

In general, where CFDS other than 'unselected' areas are affected by a proposed development, as in the case of 'priority' strandveld on the western portion of erf 18370, or where the land in question is not owned by the CCT, a regular offset process involving the identification of a bespoke offset (not part of the Landbank) needs to be followed.

**ix Identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored**

Botanical Impacts – As part of the EIA phase, the various mitigation measures that was set out in the Botanical Impact Assessment that formed part of the initial BA application will be packed out.

Freshwater impacts – The development might have impacts on the dune slack wetlands outside of the northern border of the site, it is however unlikely. A risk matrix will be completed by the freshwater specialist during the EIA phase and submitted to the DWS for input and comment. The residual risk on wetlands are low to non-existent as the stormwater mitigation measures that will be implemented as part of the development is believed to be sufficient mitigation.

Traffic impacts – A full Transport Impact Assessment (TIA) based on the detailed site development plan was prepared. The TIA assesses the impact of the future development on the surrounding road network. This assessment will be included in the EIA phase of this current Scoping/EIA process.

The residual traffic risk associated with this development, despite the implementation of a range of traffic mitigation measures that will be discussed in detail in the EIA phase, will be an overall increase in traffic generation within this area. The TIA however concludes that the traffic impacts can be mitigated to an acceptable level.

## CONCLUSION

We trust that this information is sufficient for your requirements. Please contact the writer should you require any additional information.

Yours faithfully,



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## REFERENCES

- The National Environmental Management Act, 1998 (Act 107 of 1998) as amended.
- NEMA Regulations, in terms of Chapter 5 of NEMA, Government Notice R 326 (2017)
- DEA Integrated Environmental Management Guideline Series
- The National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) as amended.
- The National Heritage Resources Act, 1999 (Act 25 of 1999) as amended.
- The National Water Act, 1998 (Act No. 36 of 1998) as amended.
- DEA&DP EIA Guideline and Information Document Series: Guideline on Alternatives (2011)
- DEA&DP EIA Guideline and Information Document Series: Guideline on Exemption Applications (2011)
- DEA&DP EIA Guideline and Information Document Series: Guideline on Need and Desirability (2011)
- DEA&DP EIA Guideline and Information Document Series: Guideline on Public Participation (2011)