

REFERENCE: 16/3/3/6/7/1/A5/88/2166/20
DATE: 05/03/2021

The Board of Directors
Kaap Agri (Pty) Ltd
Private Bag X3401
PAARL
7620

Attention: Mr. Ben Nieuwoudt

Tel.: 021 860 3745
E-mail: ben.nieuwoudt@kaapagri.co.za

Dear Sir

COMMENT ON THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT ("BAR") FOR THE PROPOSED EXPANSION OF A DIESEL STORAGE AND DISTRIBUTION DEPOT AT WESGRAAN KLIPHEUWEL SILO ON PORTION 17 OF THE FARM VRYHEID NO. 55, KLIPHEUWEL.

1. The pre-application draft BAR dated January 2021 as received by this Department via electronic correspondence on 2 February 2021 and this Directorate's acknowledgment receipt thereof dated 11 February 2021, refer.
2. The Department's comment on the pre-application draft BAR are as follows:
 - 2.1. Public Participation Process:
 - 2.1.1. Page 21 of the pre-application draft BAR indicates, that the Regional Head Environmental & Heritage Region: Azanne van Wyk, is the relevant contact person and on page 32 of the pre-application BAR, the contact person for the "City of Cape Town Environmental & Heritage Department (ERM)" is indicated as Rashaad Samaai. You are hereby informed that the correct contact person is Ms. Patricia Titmuss (e-mail: Patricia.Titmuss@capetown.gov.za) who is the Regional Head of the Environmental & Heritage Management Department for the Northern Region. It is however understood that the City of Cape Town Northern Region has received the pre-application BAR.
 - 2.1.2. Please note that the contact person for the Department of Water and Sanitation is Ms. Nelisa Ndobeni (e-mail: NdobeniN2@dws.gov.za). Please make the necessary amendments in the BAR and update the Interested and Affected Parties ("I&AP's") list accordingly.
 - 2.1.3. Please ensure that the post-application draft BAR is made available to the correct officials for review and comment.
 - 2.1.4. Further, please ensure that proof of notification of the pre-application draft BAR is included in the post-application BAR.

2.2. Protocols and Site Sensitivity

2.2.1. Based on the information contained in the Screening Report, dated 25 August 2020, the following themes, for which protocols were legislated on the 20th of March 2020 and 30 October 2020 have been identified in the Screening Tool Report:

- Agricultural Assessment;
- Terrestrial Biodiversity Impact Assessment;
- Aquatic Biodiversity Impact Assessment;
- Noise Impact Assessment;
- Plant Species Assessment; and
- Animal Species Assessment.

2.2.2. Based on the information contained in the Site Sensitivity Verification Report ("SSVR") dated 16 September 2020, the following specialist assessments will be undertaken:

- Traffic Impact Assessment; Major Hazard Identification (MHI) assessment;
- Geohydrological Investigation Report; and
- Geotechnical Investigation Report

2.2.3. This Directorate notes that the specialist assessments listed in point 2.2.2. will be undertaken and accepts that all the other specialist assessments identified in the Screening Report, dated 25 August 2020, will not be conducted, given the reasons provided in the SSVR. The following was confirmed in the SSVR:

- The site consists of hard gravel surfaces, contains no vegetation, no animal species and no watercourses.
- The site is zoned for General Industry and not for Agriculture and the proposed development will not result in the loss of agricultural land. The soil has been completely disturbed with no archaeological material found present on site.
- Therefore, none of the protocols are applicable to the proposed development, as the development site is an existing operational site, is completely transformed and offers little to no ecological functionality.

2.2.4. Please ensure that a copy of the SSVR is appended to the application form along with an updated Screening Tool Report.

2.3. It is noted that the Environmental Management Programme ("EMPr") includes mitigation measures that addresses the impact management actions required for the proposed development. Please ensure the EMPr contains recommendations and mitigation measures based on the feedback from the organs of state and specialist assessments through all phases of development. In particular, the recommendations based on the findings of the MHI Risk Assessment Report dated 29 October 2020 and Traffic Impact Statement dated September 2020, must be incorporated into the project description (where applicable) and the mitigation measures must be included in the relevant sections of the EMPr. Please ensure that the EMPr is amended to include the expected outcome of each impact management action.

2.4. Comments from, but not limited to, the following relevant authorities must be obtained during the Public Participation Process and included in the BAR submitted for decision-making:

- The City of Cape Town;
- The Department of Water and Sanitation; and
- This Department's Directorate: Pollution and Chemicals Management.

2.5. The Public Participation Process must comply with the requirements of Regulation 41 of the EIA Regulations 2014 (as amended), and proof of compliance with all the steps undertaken must be included in the post application draft BAR.

3. Kindly quote the abovementioned reference number in any future correspondence in respect of the pre-application.
4. Please note that it is an offence in terms of Section 49A(1)(a) of the NEMA for a person to commence with a listed activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity. Failure to comply with the requirements of Section 24F of the NEMA will result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.
5. This Department reserves the right to revise or withdraw any comments or request further information from you based on any information received.

Yours faithfully

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HEAD OF DEPARTMENT

DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

CC: (1) G. Roux (SEC)
(2) P. Titmuss (City of Cape Town: ERM)

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DEADP Ref: 16/3/3/6/7/1/A5/88/2166/20

CCT File Ref: KFN/21/1/2/2/79

5 March 2021

Sillito Environmental Consulting
Suite 105 Block 2 Tokai Village Centre
Tokai
Cape Town
7966

Attention: Mr Gabriel Roux (via email: gabriel@environmentalconsultants.co.za)

Cc: Ms Chantel Müller (via email: chantel@environmentalconsultants.co.za)

Dear Sir

PRE-APPLICATION DRAFT BASIC ASSESSMENT (DBAR) FOR THE PROPOSED EXPANSION OF A DIESEL STORAGE AND DISTRIBUTION DEPOT AT THE WESGRAAN KLIPHEUWEL SILO ON PORTION 17 OF THE FARM VRYHEID NO.55, CAPE FARMS, KLIPHEUWEL

Your office's correspondence, dated 4 February 2021, and the accompanying Pre-Application Draft Basic Assessment Report, dated January 2021, refers.

The following technical comment from relevant City of Cape Town Departments is provided:

1. SPATIAL PLANNING AND ENVIRONMENT: Development Management Department

- 1.1 The property is zoned Agricultural Zoning (AG) with spot zonings for General Industrial 1 (GI1).
- 1.2 As per the Site Layout Plan (Option 1; dated September 2020) as compiled by *EFG Engineers (Pty) Ltd*, the existing diesel tanks are evident in close proximity to the silos. It is concluded that the yellow areas marked as T1 to T5 entails the proposed diesel tanks.
- 1.3 This corresponds with the General Industrial 1 zoned area and the filling station per the City of Cape Town land use management zoning and consent use approval (Case ID: 70074044), dated 18 May 2015. The zoning extract included in the documentation (appendix E2) does not include the final notification of the above approval or the conditions of approval referred to in the zoning extract.
- 1.4 The Fire and Life Safety Department needs to consider the proposal to determine if it entails a Risk Industry. If the latter applies, then a rezoning from GI1 to RI will be required. It is noted however that Fire and Life Safety was satisfied with the proposal and it is therefore, concluded that the proposal will be in terms of the current zoning approval.

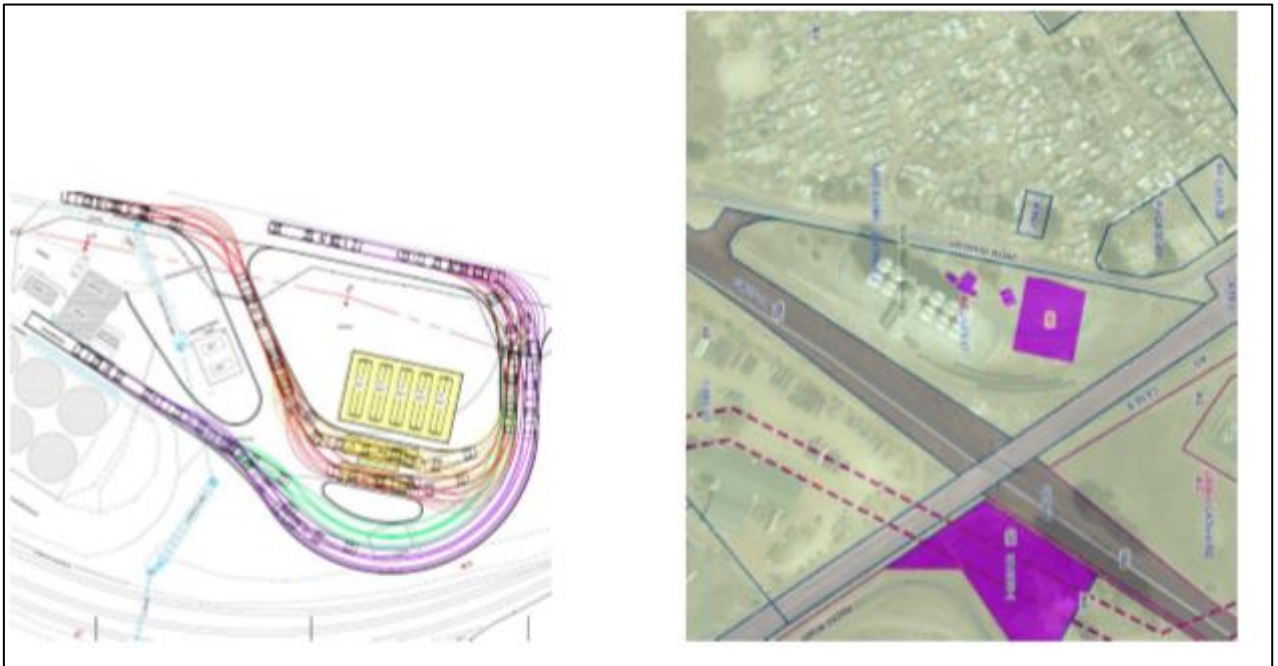


Figure 1: Extract from Site Layout Plan (left) and City of Cape Map Viewer indicating GI1 spot zonings (right).

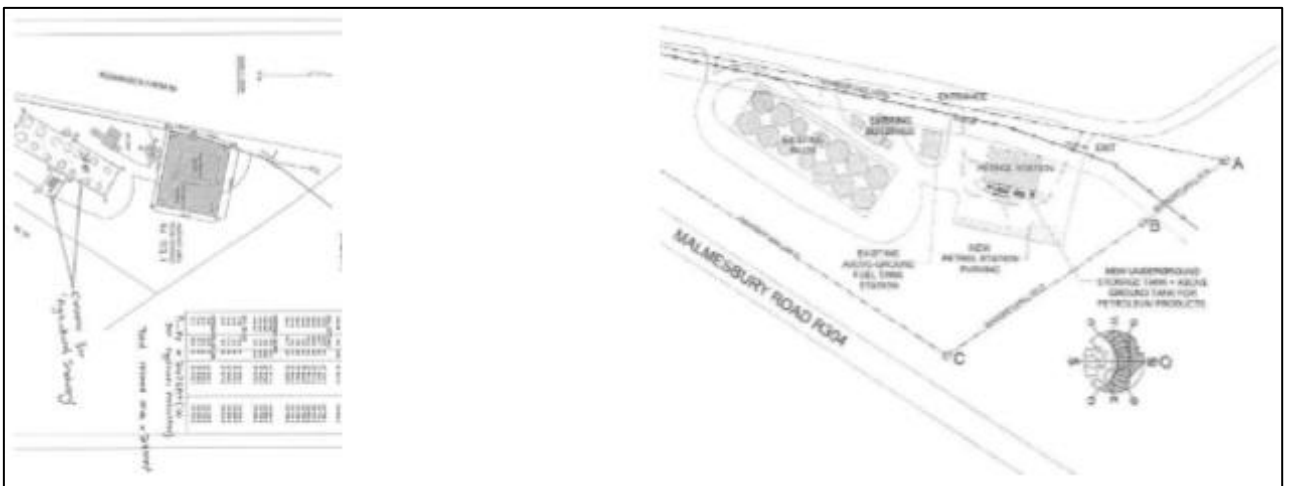


Figure 2: Spot zonings on the subject farm as per land use management rezoning and consent use approval (left) and service station as per approved site development plan (right).

2. SAFETY AND SECURITY: Fire and Life Safety – Fire and Rescue Services Department

- 2.1 Compliance with SANS 10400 of 2020 and the *Community Fire Safety By-law*, Provincial Gazette 5832 (as amended 29 June 2007 and 21 August 2015), with special reference to –
- Plans to be submitted for the above ground diesel tanks in accordance with SANS 10089 Part 1.
 - A risk assessment in terms of the Major Hazardous Installation Regulations as contained within the Occupational Health and Safety Act (Act 85 of 1993) must be carried out.
 - A risk assessment must be performed by an Approved Inspection Authority and comply with the requirements of Regulation 5 of the Major Hazard Installation Regulations.
 - The owner or person in charge of the premises must apply for a Flammable Substance Certificate.

3. SAFETY AND SECURITY: Disaster Management Risk Services

- 3.1 The on-site emergency plan and accompanying risk assessment must be updated to include the proposed expansion of the diesel storage depot and should be implemented during the construction and operation phases.

4. TRANSPORT: Transport Impact Assessment and Development Control Branch

- 4.1 The Traffic Impact Assessment, dated September 2020, as compiled by *EFG Engineers*, was studied by this Branch. This Branch provides no objection to the findings and recommendations reflected therein.
- 4.2 This Branch will provide detailed technical comments during the formal land use management application.

5. ENERGY AND CLIMATE CHANGE: Electricity Generation and Distribution Branch

- 5.1 Portion 17 of Farm Vryheid No. 55 Klipheuwel does not fall within the City of Cape Town's electrical distribution area.
- 5.2 Please refer the matter to Eskom for further comment as they are responsible for electrical distribution in this area.

6. COMMUNITY SERVICES AND HEALTH: City Health – Specialised Health Services - Environmental Health

- 6.1 The following legislation must be included under section C: legislation/policies/or guidelines or guidelines/protocols:
- The National Health Act 61 of 2003; and
 - City of Cape Town: Environmental Health By-law, 30 June 2003.

7. COMMUNITY SERVICES AND HEALTH: City Health – Specialised Environmental Health - Noise Control Unit

- 7.1 The application was scrutinised and assessed in terms of the *Western Cape Noise Control Regulations, 2013*, and the relevant SANS codes of practice.
- 7.2 Due to the nature of the current activity being industrial, a site visit was conducted on 19 and 23 February 2021 and the outcome revealed the following:
- There are residential dwellings opposite the factory.
 - Ambient noise emanating from the mechanical machinery (fan) located at the application site was 72.1 dBA at the time of visit on 23 February 2021, this is slightly (2dBA) above the 70dBA requirement for a daytime operation, after 22h00 the requirement is 60dBA for industrial districts.
- 7.3 The results (table below) indicate that the current operation is not compliant with *Regulation 4 of the Western Cape Noise Control Regulations 2013*, due to the exceedance for the land use category. The expansion is anticipated to increase the ambient noise of the activity, there by exceeding both night-time and daytime rating levels.

Type of district	Daytime LReq, d	Night time LReq,n
Industrial	70dB(A)	60dB(A)

The Noise Control Unit provided the following requirements that must be addressed:

Construction Phase

- 7.4 The proposed building works must be undertaken subject to compliance with Part F6 of the National Building Regulations and Building Standards Act No.103 of 1977(as amended).

Operational Phase

- 7.5 Due to the non-compliance with the land use requirements for an industrial district, the City of Cape Town Noise Control Unit requires the applicant to submit an assessment of anticipated noise sources and a noise management plan for each source (including existing sources) before the application is decided.

These requirements are based on information received at the time of assessment, the Noise Control Unit reserves the right to revise its comment and call for further requirements should new information becomes available.

8. COMMUNITY SERVICES AND HEALTH: City Health – Specialised Environmental Health - Air Quality Management Unit

Construction Phase

- 8.1 No dust nuisance is to be created during the construction operations and provision must be made for sufficient dust mitigation measures to be implemented. It is noted in the DBAR and Environmental Management Programme (EMPr) that dust impacts are expected to occur and mitigation measures are proposed.
- 8.2 Should any cement silos be employed on site, the silos are to be fitted with appropriate dust control systems for dust emissions abatement during bulk materials loading, unloading and transfer operations.
- 8.3 The activities conducted on site must comply with the provisions set out in terms of Section 26 of the City of Cape Town Air Quality Management By-law dated 17 August 2016, which states the following:

See the extract in the box below

Note: - with regards to conditions 5 and 6, it is to be noted that the National Dust Control Regulations are currently undergoing review and amendments. Once promulgated the applicable methodology and standards to be complied with will need to be adhered to.

Dust Emissions:

- 1) Any person who conducts any activity or omits to conduct any activity which causes or permits dust emissions into the atmosphere that may be harmful to public health and wellbeing or is likely to cause a nuisance to persons residing or present in the vicinity of such land, activity or premises shall adopt the best practical environmental option to the satisfaction of the authorised official, to prevent and abate dust emissions.
 - 2) An authorised official may require any person suspected of causing a dust nuisance to submit a dust management plan within the time period specified in the written notice.
 - 3) The dust management plan contemplated in subsection (2) must:
 - (a) identify all possible sources of dust within the affected site;
 - (b) detail the best practicable measures to be undertaken to mitigate dust emissions;
 - (c) detail an implementation schedule;
 - (d) identify the person responsible for implementation of the measures;
 - (e) incorporate a dust fall monitoring plan; and
 - (f) establish a register for recording all complaints received by the persons regarding dustfall, and for recording follow up actions and responses to the complaints.
 - 4) The authorised official may require additional measures to be detailed in the dust management plan.
 - 5) The dust management plan must be implemented within a time period specified by the authorised official in a written notice.
 - 6) Failure to comply with the provisions of this section constitutes an offence."
4. Compliance in terms of the National Dust Control Regulations, Government Notice 827 dated 1 November 2013, as may be amended from time to time. It is noted that the National Dust Control Regulations is referenced in the documents.
 5. Monitoring methodology (should this be included in the Dust Management Plan): The method to be used for measuring dust fall rate and the guideline for locating sampling points shall be ASTM D1739: 1970, or equivalent method approved by any internationally recognised body.
 6. The standard for the acceptable dust fall rate is set out in Table 1 below.

Table 1: Acceptable dust fall rates

Restriction Areas	Dust fall rate (D) (mg/m ² /day, 30-days average)	Permitted frequency of exceeding dust fall rate
Residential area	D < 600	Two within a year, not sequential months.
Non-residential area	600 < D < 1200	Two within a year, not sequential months.

Operational Phase

- 8.4 There are already 2 x 23m³ above ground diesel storage tanks on site. The proposed application is to expand the existing fuel storage capacity by an additional 5 x 83m³ horizontal above ground diesel tanks. The proposed combined diesel fuel storage capacity for the site will be 461m³. Based on the combined fuel storage capacity for the site, the facility does not trigger a Listed Activity in terms of Section 21, Government Notice 893 of 2013 as amended by notice 1207 dated 31 October 2018, (Amendments of Listed Activities and Associated Minimum Emissions Standard) of the National Environmental Air Quality Act 39 of 2004, therefore, an Atmospheric Emission Licence will not be applicable for the facility.
- 8.5 The AQM Unit recommends that an Emergency Preparedness Plan be developed and incorporated in the Environmental Management Programme (EMPr). The Emergency preparedness plan should make reference to a site specific Leak Detection and Repair (LDAR) programme as a preventative measure to mitigate emissions to atmosphere and any fuel leakages from connection pipes and fuel tank infrastructure as well as any spillages during re-fuelling of the tanks.
- 8.6 Emergency incidents such as significant hydrocarbon spills must be brought to the attention of the relevant authorities as described in Section 30 of the National Environmental Management Act (NEMA) within the prescribed legal timelines. This would require

notification to the relevant local and provincial authorities and any other authority deemed necessary and must be included in the EMPr. The management of NEMA Section 30 incidents must be documented in the EMPr.

- 8.7 All breather vents of the fuel storage tanks must be positioned in such a way for hydrocarbon/fuel vapour not to cause a potential nuisance to occupiers of neighbouring premises.
- 8.8 All activities must be conducted in compliance with *Section 35(2) of the National Environmental Management Act (Act 39 of 2004) as amended*, which provides that *"The occupier of any premises must take all reasonable steps to prevent emission of any offensive odour caused by any activity on such premises."*
- 8.9 The Air Quality Management Unit is satisfied with the Mitigation Measures provided in the Environmental Management Programme (EMPr) and BAR under the following headings:
 - Objective 1: Avoid Soil & Groundwater Contamination
 - Objective 2: Avoid Air Quality Impact
 - Objective 3: Avoid Fire, Health & Safety Impacts
 - Objective 4: Compile a Spill Contingency Plan for the Fuel Depot

General

- 8.10 The list of guidelines on page 18 and 19 of the BAR must be updated to include the provisions of the City of Cape Town Air Quality By-law, 2016.
- 8.11 The City of Cape Town's Head: Specialised Environmental Health Services / Air Quality Officer reserves the right to call for any further requirements, should the need arise.

9. WATER AND WASTE: Water and Sanitation

Background

- 9.1 No services are required to support this proposal. This is a diesel storage expansion activity, at an existing facility with existing infrastructure in place (existing ablutions, existing electricity, existing stormwater management infrastructure etc.).
- 9.2 The groundwater depth is approximately 10m below ground. In this case the storage of fuel is proposed in Above Ground Tanks, not underground. The tanks will be placed on concrete surfaces within concrete bunded walls and therefore even if a leak or spill does take place there will be no risk of soil or groundwater contamination as the fuel will be retained within the bund wall.
- 9.3 Minimal water will be used during the construction phase. Grey water will be used where necessary.

Water Reticulation

- 9.4 The proposed development falls within the Klipheuwel distribution zone. There is an existing 75mmØ water connection at the north-west entrance, from Vryheid Road, servicing this erf. This connection feeds off a 75mmØ water main serving the informal settlement on the westward of the erf, along Vryheid Road. There appears to be an existing 110mmØ water main at the Northwest vertex of the erf.

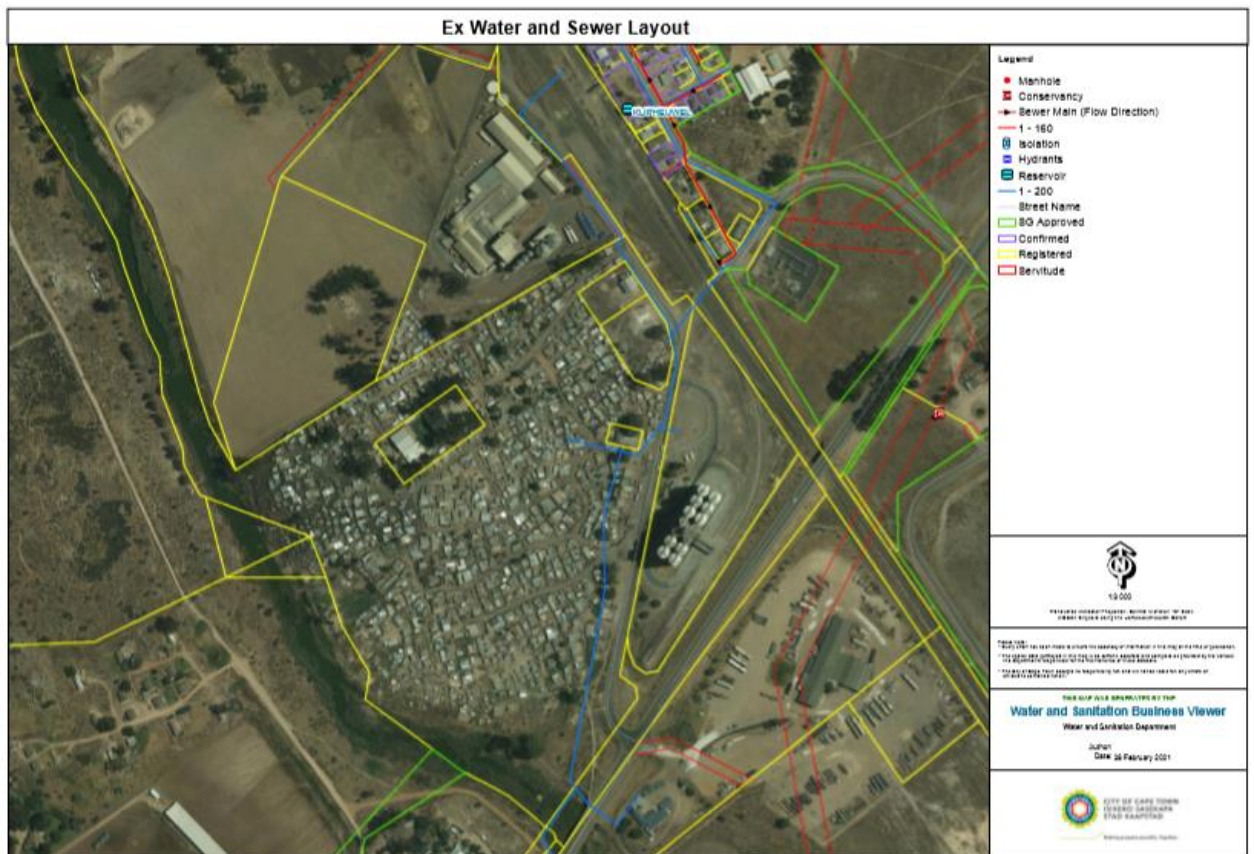


Figure 3: Existing Water and Sewer Layout

Bulk Water

- 9.5 No infrastructure under the control of the City of Cape Town's Bulk Water Branch exists in the immediate vicinity of the proposed development shown in the application.

Sewer Reticulation

- 9.6 The proposed development falls in the catchment of Klipheuwel wastewater treatment works (WWTW). The nearest sewer main is an existing 150mmØ sewer rising main on the other side of CA55-1 Railway. This sewer network discharges at Klipheuwel WWTW.

Wastewater Treatment

- 9.7 This development is situated in the Klipheuwel WWTW catchment.

Water Pollution Control

- 9.8 Measures need to be taken to prevent pollution to the stormwater and groundwater system surrounding the area. It has been noted that the fuel tanks will be placed on concrete surface surrounded by concrete bund walls.

Conclusion

- 9.9 According to the report, the proposed development will not require additional water and sewer services.

The Water and Sanitation Department has provided the following requirements to be addressed:

- 9.10 Development contributions are payable as per the DC policy, to be quantified by the Reticulation Regional Operations Manager, if applicable.
- 9.11 All costs relating to service connections, alterations to or provision of new water and sewerage services will be for the account of the applicant.
- 9.12 Water-saving measures to be incorporated into the development.
- 9.13 It is the responsibility of the developer to acquire a water use license from the National Department of Water and Sanitation.
- 9.14 Storm water ingress to be eliminated from the sewer system.

Water & Sanitation General/ Disclaimer

Information provided is based on best available data.

10. WATER AND WASTE: Water and Sanitation - Catchment, Stormwater and River Management Branch

- 10.1 Taking into consideration the extent and nature of the proposed ultimate development, it is crucial that a sustainable stormwater management system be designed, which is conducive to the Health & Safety of the general public and improves / protects the environment/ ecosystem.
- 10.2 A Stormwater Management Plan (SWMP) is required in terms of the City's stormwater policies. (Management of Urban Stormwater Impacts Policy and Floodplain and River Corridor Management Policy, both were approved by Council on 27 May 2009).
- 10.3 The overall stormwater strategy of this precinct must comply with the City of Cape Town's (the City) Stormwater Policies and By-law, noted here below:
 - Management of Urban Stormwater Impacts Policy, approved by Council: 27 May 2009
 - Floodplain and River Corridor Management Policy, approved by Council: 27 May 2009
 - By-Law Relating to Stormwater Management, approved by Council: 30 August 2005
- 10.4 Ensure that stormwater Best Management Practices (BMP's) and stormwater runoff quantity/quality improvements are implemented on site (i.e. rain tanks, rain gardens, etc.) as stipulated in the Management of Urban Stormwater Impacts Policy, approved by Council: 27 May 2009.

The Catchment, Stormwater and River Management Branch provided the following requirements that must be addressed:

- 10.5 That a comprehensive Stormwater Management Plan (SWMP) be submitted to the Catchment, Stormwater and River Management Branch prior to building plan and/ or civil engineering design drawing submission.
- 10.6 Groundwater - Installation of oil water separator of sufficient capacity must be installed on site to address runoff quality. Discharge from the Oil Water Separator must be discharged to sewer.
- 10.7 Heavy vehicle use must address the risk of hydrocarbon spills (during construction phase, operational phase and closure).
 - a) Any fuel (hydrocarbons) stored on site (during any stage of the project) must be store in a purpose built impermeable bunded area capable of containing 110% of the spill volume.
 - b) Emergency management procedures must be in place and accessible to address any hydrocarbon spillage.

- 10.8 Include in the EMPr Section 7: LEGAL FRAMEWORK, the following Stormwater Policies and By-Law:
- Management of Urban Stormwater Impacts Policy, approved by Council: 27 May 2009
 - Floodplain and River Corridor Management Policy, approved by Council: 27 May 2009
 - By-Law Relating to Stormwater Management, approved by Council: 30 August 2005
- 10.9 The City of Cape Town reserves its right to hold the Developer liable for any claims in respect of damage to municipal/private property or infrastructure and additional municipal maintenance costs incurred as a result of flooding, siltation, and contaminated stormwater caused by construction activities on this precinct and/or ceasing of work due to inclement weather.
- 10.10 It is the responsibility of the Developer and his Environmental Consultant to ensure that, if any of the steps required above will require further authorisation from any other Organ of State, such as authorisation(s) must be obtained and be brought to this Office's attention. (i.e. Water Use License, Environmental Authorisation, General Authorisation or renewal/amendment, etc.)

Please note that these comments are based on the information that has been received to date. Should any new information be provided to this office, then this office reserves the right to review the recommendations as deemed appropriate.

11. SPATIAL PLANNING AND ENVIRONMENT: Environmental Management Department –Environmental and Heritage Management

Draft BAR

- 11.1 The contact person under *Section A: Administrative Details* (page 21 of DBAR) must be corrected as follows: Ms Pat Titmuss (Head: Environmental and Heritage Management Branch – Northern District). Email address: patricia.titmuss@capetown.gov.za and telephone number: 021 444 0597.
- 11.2 Under the heading *Biodiversity* (page 34-25 of the DBAR), the following is stated: “*The property is completely transformed and currently an operational facility (Zoned General Industry – Grain Storage Facility). The site has no ecological functioning, as the site consists only of hard gravel surfaces and contains no vegetation, no animal species and no natural watercourses.*” However, from the site photographs (appendix C) it is noted that the site supports some trees and grass along the existing stormwater infrastructure and at the entrance to the site. This information must also be included.
- 11.3 On page 39 of the DBAR the following is stated: “*The existing access, stacking and circulation of grain trucks to/from the silos were taken into account when developing the two options, i.e. Proposed Site Layout Plan Option 1 (See attached as Appendix B1) and Proposed Site Layout Plan Option 2, for the proposed bulk fuel depot.*” Only Option 1, which is the preferred option layout for the proposed additional aboveground tanks and associated entrance/exit for trucks, is appended (Appendix B). The proposed site layout plan referred to as Option 2 must also be appended under appendix B to ensure that site plans in the appendices align with the written text and vice versa.
- 11.4 The following is stated on page 36: “*Due to the location of the development opposite an informal settlement, a potential health and safety risk was identified.*” Where the proposed additional 5 aboveground tanks are currently proposed, the ground surface is gravelled and there are existing power lines along the internal boundary of the site. EMD, however, recommends that trees (and/or small growing shrubs) be proposed along the internal boundary abutting Vryheid Road in order to screen the proposed tanks from the adjacent

informal settlement. This will contribute to decreasing the visual impact of the proposed tanks.

Appendix B1: Site Layout (Option 1; dated September 2020) as compiled by EFG Engineers (Pty) Ltd

11.5 The expansion proposal includes the following as stated on page 23 of the DBAR:

- 5 x 83m³ above ground diesel storage tanks;
- Bund retaining wall;
- Separate loading and offloading points on spill containment slabs;
- Brick paved roadways;
- Raised islands (to prevent access via truck)

The above proposals must clearly be labelled and indicated on the proposed site layout (Option 1) for ease of reference.

Appendix C: Photographs

11.6 The figures are undated. The date when these photographs were taken must be indicated at each photograph for reference.

Appendix H: Environmental Management Programme, dated January 2021, as compiled by Sillito Environmental Consulting

11.7 Under the heading *Mitigation Measures* (page 9), the following sentence must be amended as follows: "A suitably qualified and experienced Environmental Control Officer must be appointed before any activities commence on site. Such appointment must be sent to the CCT: Environmental Management Department, specifically the Head: Environmental and Heritage Management Department – Northern District, prior to the commencement of any works on-site."

11.8 Point 2 under *Mitigation Measures* (page 9) must be amended as follows: "The ECO must inspect the site fortnightly for the duration of the construction phase and submit monthly ECO Audit Reports to the City of Cape Town: Environmental Management Department."

11.9 Under the heading *Matters Pertaining to Non-Conformance on-site* (pdf page 35), the following point must be included: "All fines and penalties must be paid to an environmental organization to be determined in consultation with the City of Cape Town: Environmental Management Department."

CONCLUSION

The comments raised in this letter must be reflected in the Draft Basic Assessment. The report must kindly be submitted to this office in the form of 1 x hard copy and 1 x electronic CD/flash disk version.

Yours sincerely



PAT TITMUSS

**Head: Environmental & Heritage Management – Northern District
Environmental Management Department**