

Scoping and Environmental Impact Assessment (EIA) for GreenTech in Zone 2
of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

DRAFT SCOPING REPORT



PREPARED FOR:
City of Cape Town Metropolitan
Municipality and GreenCape Sector
Development Agency

PREPARED BY: CSIR

Scoping and Environmental Impact Assessment (EIA) for
GreenTech in Zone 2 (Portion Remainder of ERF 277, ERF
246, ERF 254 and Portion Remainder of ERF 171) of the
Atlantis Special Economic Zone, Atlantis Industrial, Western
Cape

DEA&DP REFERENCE NUMBER: 16/3/3/6/7/2/A1/2/3316/18

DRAFT SCOPING REPORT (Version 2)

January 2019

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City of Cape Town Metropolitan Municipality and GreenCape Sector Development Agency

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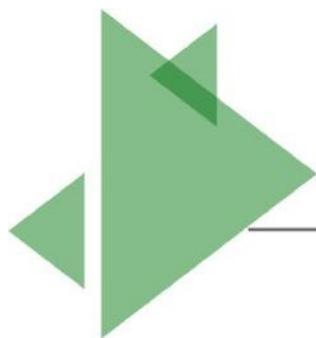
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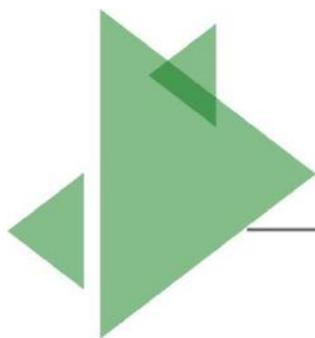
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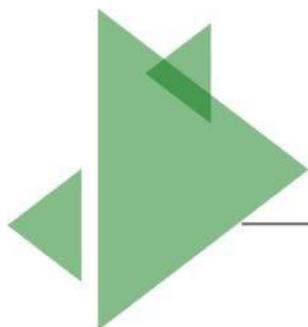
REPORT DETAILS

Title:	Scoping and Environmental Impact Assessment (EIA) for GreenTech in Zone 2 of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape
Purpose of this report:	<p>This Draft Scoping Report (v2) forms part of a series of reports and information sources that are being provided during the Environmental Impact Assessment (EIA) process for the proposed GreenTech in the Atlantis SEZ, Western Cape. In accordance with the EIA Regulations, the purpose of the Scoping Report is to:</p> <ul style="list-style-type: none">• Provide a description of the proposed project, including a sufficient level of detail to enable stakeholders to raise issues and concerns;• Describe the local planning context and environment within which the project is proposed, to assist further in identifying issues and concerns;• Provide an overview of the process being followed in the Scoping Phase, in particular the public participation process, as well as present the Plan of Study for EIA that would be followed in the subsequent EIA phase; and• Present the issues and concerns identified to date from the stakeholder engagement process, together with an explanation of how these issues will be addressed through the EIA process.
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Date:	January 2019
To be cited as:	Greentech Project in the Atlantis SEZ (DEA&DP REFERENCE NUMBER: 16/3/3/6/7/2/A1/2/3316/18)



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SUMMARY

PROJECT OVERVIEW

The City of Cape Town (CoCT): Property Management Department in collaboration with GreenCape is proposing to develop a Green Technology Manufacturing facility (hereafter referred to as “GreenTech”) and associated infrastructure in the Atlantis Special Economic Zone (SEZ)¹ on the land designated as Zone 2. Zone 2 is made up of several land portions that will comprise the “site”, namely ERF Portion Remainder of ERF 277, ERF 246, ERF 254 and ERF Portion Remainder of 171 (these are the new ERF numbers, previously known as portions of Cape Farm 1183), Atlantis Industrial, approximately 40 km north of Cape Town. The portions that comprise the site (i.e. Zone 2) make up a total of 32.6 ha which will be used for the proposed development.

The site is zoned “General Industrial” and is located in the Atlantis Industrial Area. The site is therefore within the Urban Edge of Atlantis and is in line with the principles of the Cape Town Spatial Development Framework. The proposal is therefore to utilise the proposed portions of land located in the Atlantis Industrial Area for its intended purposes - Industrial development. Furthermore, the CoCT intend to lease the land to investment companies in the green-technology space and those company seeking to manufacture components to supply to the renewable energy industry, amongst other sectors, within the green economy sector.

Need for the Project

A Special Economic Zone (SEZ) is an economic development tool to promote national economic growth and export by using targeted support measures to attract foreign and domestic investments and technology. Traditionally SEZs geographically delineated and fenced- in areas that allowed for the duty- and tax-free import of raw and intermediate materials for processing and re-export. Modern forms of SEZs are not exclusively export focused and can encompass larger areas and support a wider range of economic activities or have a specific technology or sector focus. The new SEZ Policy headed by the Department of Trade and Industry provides a clear framework for development, operation and management. The policy provides a wide range of incentives to expand the focus of strategic industrialisation to cover diverse regional development needs and context; to provide a clear, predictable and systemic planning framework for the development of a wider array of SEZs to support industrial policy objectives. The Industrial Policy Action Plan (IPAP), NDP and the NGP, clarify and strengthen governance arrangements and expand the range and quality of support measures beyond the provision of infrastructure. They also provide a framework for predictable financing to enable long-term planning. SEZ’s in South Africa, such as the Atlantis Industrial area, and have the ability to accelerate the rate of industrial development and agglomeration. They are a platform for guiding the deployment of

¹ The Atlantis SEZ was adopted on 19 October 2018, Government Gazette 41982, Regulation No. 1130

other tools such as incentives, skills development and infrastructure development. Incentives that are available to investors include VAT and Custom Relief linked to a customised-controlled area, Employment Tax Incentive (ETI), Building Allowance and Reduced Corporate Income Tax Rate.

Project Description

It is important to point out at the outset that the exact specifications of the proposed project components will be determined during the detailed engineering phase.

The CoCT has made available this portion of vacant, City owned industrial land for these purposes, namely the manufacturing and supply of utility-scale renewable energy to the national grid and associated 'green' technology industries e.g. producing turbine blades, turbine towers, turbine assemblers, PV panel assembly plants and inverter manufacturers etc. The buildings (coverage, height etc.) to be located on site will be in accordance with the existing zoning of the site and the location in which the site is situated i.e. 'General Residential' and the Atlantis Industrial Area. The CoCT's building regulations and planning policies will be adhered to. A combination of Technological Alternatives will form part of the 'green' manufacturing hub in Atlantis. Typically, a GreenTech manufacturing facility would consist of the following:

- Headquarters and Incubator Hub (flexible building design approach to allow for possible phased development and reconfiguration over time and a deep-space building footprint to accommodate a variety of internal subdivision arrangements. These structures will house offices and facilities for personnel and will not decrease aesthetic value in the surrounding area;
- A typical "warehouse" structure (industrial park);
- Storage facilities (combined with the workshop and provides accommodation for the maintenance personnel, plant equipment and spare parts);
- Existing access roads and works;
- Existing municipal service connections:
 - Potable Water: The site can be serviced from a 150 mm diameter pressurised pipe-line municipal pipeline provides for both domestic and fire-fighting requirements. Pressure within the pipeline is maintained between 7 to 9 bars, should water be required at higher pressure then booster pumps will have to be installed by the developer.
 - Foul Sewer: In the Atlantis district there are two parallel municipal gravity pipeline in the adjacent road network. Generally effluent is divided into two categories namely: (1) Domestic effluent generated from toilets, showers, hand basins and kitchen sinks, and (2). Industrial effluent which could include noxious effluents (bye produfrom manufacturing process).
 - Electrical: The City of Cape Town is the supplier of electricity to the Atlantis Industrial area. The security of electricity supply in Atlantis industrial has improved significantly in order to encourage development. The CoCT invested roughly R114 million on electricity supply upgrades for Atlantis. These upgrades added to the Eskom upgrades and have increased the power supply to the area by approximately 90 MVA, totalling 170 MVA supply in the area. It is also potentially proposed that **alternative renewable energy sources** will be considered, i.e. photovoltaic (PV) panels, to provide electricity directly into the building (depending on energy requirements).
 - Solid Waste: The removal of refuse (solid waste) is managed by the municipality, alternatively this service can be provided by private contractors, depending on developer's needs.

Need for an Environmental Impact Assessment

As noted above, in terms of the EIA Regulations promulgated under Chapter 5 of the NEMA published in GN R327, R326, R325 and R324 in Government Gazette 40772, dated 7 April 2017, a full Scoping and EIA Process is required for the proposed project. The need for the full Scoping and EIA is triggered by, amongst others, the inclusion of Activity 15 listed in GN R325 (Listing Notice 2):

“15. The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for- (i) the undertaking of a linear activity; (ii) maintenance purposes undertaken in accordance with a maintenance management plan.”

The purpose of the EIA is to identify, assess and report on any potential impacts the proposed project, if implemented, may have on the receiving environment. The Environmental Assessment therefore needs to show the Competent Authority, the DEA&DP (Western Cape); and the project proponent, City of Cape Town, what the consequences of their choices will be in terms of impacts on the biophysical and socio-economic environment and how such impacts can be, as far as possible, enhanced or mitigated and managed as the case may be.

Purpose of the Scoping Report

The Scoping Phase of the EIA refers to the process of determining the spatial and temporal boundaries for the EIA. In broad terms, the objectives of the Scoping Process in terms of the 2014 NEMA EIA Regulations (as amended on 7 April 2018 (GN R326) are to:

- Confirm the process to be followed and opportunities for stakeholder engagement;
- Clarify the project scope to be covered;
- Identify and confirm the preferred activity and technology alternative;
- Identify and confirm the preferred site for the preferred activity;
- Identify the key issues to be addressed in the impact assessment phase and the approach to be followed in addressing these issues; and
- Confirm the level of assessment to be undertaken during the impact assessment

This is achieved through parallel initiatives of consulting with:

- The lead authorities involved in the decision-making for this EIA application;
- The public to ensure that local issues are well understood; and
- The EIA specialist team to ensure that technical issues are identified.

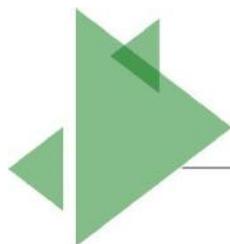
The Scoping Process is supported by a review of relevant background literature on the local area. Through this comprehensive process, the environmental assessment can identify and focus on key issues requiring assessment. The primary objective of the Scoping Report is to present key stakeholders (including affected organs of state) with an overview of the project and key issues that require assessment in the EIA Phase and allow the opportunity for the identification of additional issues that may require assessment. Issues raised in response to the Draft Scoping Report (**pre-application version of the DSR was released to the public from the 25th October 2018 to the 26th November 2018**) have been captured in an Comments and Responses Trail as an **Appendix E** to this updated Draft Scoping Report, and any comments received on this Draft Scoping Report (v2), which is currently out for a 30 day public

comment period, will be included in an updated comments and responses trail in the Final Scoping Report to be submitted to the DEA&DP for decision-making (i.e. approval or rejection) in line with Regulation 21 (1) of GN R326. If no comments are received in addition to the comments received on the pre-application version of the Draft Scoping Report, it will be taken that the I&AP/Organ of State has no further comments. This approval is planned to mark the end of the Scoping Phase after which the EIA Process moves into the impact assessment and reporting phase.

Identification of Issues

The results of this high-level preliminary impact assessment will be verified by relevant specialists during the EIA Phase. Table 7.4 in Chapter 7 highlights the summary of issues and impacts to be addressed in the EIA phase, as well as the extensive list of existing information for the Atlantis SEZ that has and will be used (to avoid study duplication). Potential impacts associated with the Atlantis GreenTech project are anticipated to mainly be of **very low to moderate negative significance after mitigation**, whilst some high positive socio-economic impacts may be expected.

The Plan of Study for EIA (Chapter 7) presents the approach to the forthcoming EIA Phase. This includes the Terms of Reference for the various specialist studies that are proposed to address the issues raised, where necessary.



GLOSSARY

AEL	Air Emissions License	IDP	Integrated Development Plan
ADT	Average Daily Traffic	IPP	Independent Power Producer
AGIS	Agricultural Geo-Referenced Information System	IRP	Integrated Resource Plan
BGIS	Biodiversity Geographic Information System	kWh	Kilowatt Hours
BID	Background Information Document	MW	Megawatts
CA	Competent Authority	NBA	South African National Parks
CBA	Critical Biodiversity Area	NEMA	National Environmental Management Act (Act 107 of 1998)
CCGT	Closed Combined Gas Turbine	NEMBA	National Environmental Management: Biodiversity Act
CoCT	City of Cape Town	NERSA	National Energy Regulator of South Africa
CSIR	Council for Scientific and Industrial Research	NFEPA	National Freshwater Ecosystems Protected Areas
DAFF	National Department of Agriculture, Forestry and Fisheries	NHRA	National Heritage Resources Act (Act 25 of 1999)
DEA	National Department of Environmental Affairs	NPAES	National Protected Expansion Strategy
DEA&DP	Western Cape Department of Environmental Affairs and Development Planning	NWA	National Water Act (Act No. 36 of 1998)
DMR	National Department of Minerals Resources	PES	Present Ecological State
DOE	Department Of Energy	PPA	Power Purchasing Agreement
DOT	National Department of Transport	S&EIR	Scoping and Environmental Impact Reporting
DSR	Draft Scoping Report	SABAP2	South African Bird Atlas Project
DWA	National Department of Water Affairs	SAHRA	South African Heritage Resources Agency
EA	Environmental Authorization	SANRAL	South African National Roads Agency Limited
EAP	Environmental Assessment Practitioner	SANS	South African National Standards
EIA	Environmental Impact Assessment	SANBI	South African National Biodiversity Institute
EMPr	Environmental Management Programme	SDF	Spatial Development Framework
ESA	Ecological Support Area	SEZ	Special Economic Zone
FEPA	Freshwater Ecosystem Protection Areas	TDS	Total Dissolved Solids
FSR	Final Scoping Report	ToR	Terms of Reference
GA	General Authorization	WASA	Wind Atlas of South Africa
GG	Government Gazette	WMA	Water Management Area
GIS	Geographical Information Systems	WULA	Water Use License Application
GN R	Government Notice Regulation		
HWC	Heritage Western Cape		
I&AP	Interested and Affected Party		
IEM	Integrated Environmental Management		

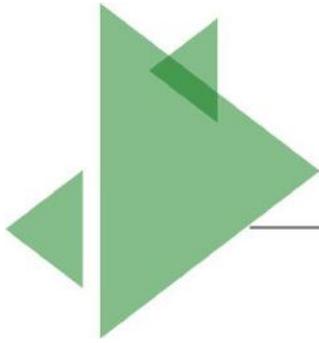
Scoping and Environmental Impact Assessment (EIA) for GreenTech in Zone 2
of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

DRAFT SCOPING REPORT



CHAPTER 1

INTRODUCTION



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NEMA REQUIREMENTS WITH REFERENCE TO RELEVANT SECTIONS OF THIS REPORT

The Environmental Impact Assessment (EIA) process undertaken to date has culminated in the production of this updated Draft Scoping Report (DSR), which provides information relevant to the project and establishes the potential impacts of the project and the methodologies and impacts that will be assessed in detail during the impact assessment phase.

Table 1.1 illustrates how the structure of the FSR addressed applicable requirements for information in terms of National Environmental Management Act (Act No. 107 of 1998) (NEMA).

Table 1.1: Requirements of a Scoping Report as defined in terms of Appendix 2 of GN R326

Section of the EIA Regulations	Requirements for a Scoping Report in terms of Appendix 2 of the 2017 NEMA EIA Regulations (GN R326)	Chapter and sub-section
Appendix 2 - (1)(a)	Details of - i. the EAP who prepared the report; and ii. the expertise of the EAP, including a curriculum vitae;	Chapter 1 and Appendix A
Appendix 2 - (1)(b)	The location of the activity, including - i. the 21 digit Surveyor General code of each cadastral land parcel; ii. where available, the physical address and farm name; iii. where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties;	Chapter 1, 2 and 3
Appendix 2 - (1)(c)	A plan which locates the proposed activity or activities applied for at an appropriate scale, or, if it is - i. a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or ii. on land where the property has not been defined, the coordinates within which the activity is to be undertaken;	Chapter 2 and 3
Appendix 2 - (1)(d)	A description of the scope of the proposed activity, including – i. all listed and specified activities triggered; ii. a description of the activities to be undertaken, including associated structures and infrastructure;	Chapter 1, 2 and 4
Appendix 2 - (1)(e)	A description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process;	Chapter 4
Appendix 2 - (1)(f)	A motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location;	Chapter 1, Section 1.2.1
Appendix 2 - (1)(g)	A full description of the process followed to reach the proposed preferred activity, site and location of the development footprint within the site, including - i. details of all the alternatives considered; ii. details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;	Chapter 5 and Chapter 6

Section of the EIA Regulations	Requirements for a Scoping Report in terms of Appendix 2 of the 2017 NEMA EIA Regulations (GN R326)	Chapter and sub-section
	<ul style="list-style-type: none"> iii. a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them; iv. the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; v. the impacts and risks which have informed the identification of each alternative, including the nature, significance, consequence, extent, duration and probability of such identified impacts, including the degree to which these impacts – <ul style="list-style-type: none"> (aa) can be reversed; (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed or mitigated; vi. the methodology used in identifying and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives; vii. positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; viii. the possible mitigation measures that could be applied and level of residual risk; ix. the outcome of the site selection matrix; x. if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such and xi. a concluding statement indicating the preferred alternatives, including preferred location of the activity; 	
Appendix 2 - (1)(h)	<p>A plan of study for undertaking the environmental impact assessment process to be undertaken, including -</p> <ul style="list-style-type: none"> i. a description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity; ii. a description of the aspects to be assessed as part of the environmental impact assessment process; iii. aspects to be assessed by specialists; iv. a description of the proposed method of assessing the environmental aspects including aspects to be assessed by specialists; v. a description of the proposed method of assessing duration and significance; vi. an indication of the stages at which the competent authority will be consulted; vii. particulars of the public participation process that will be conducted during the environmental impact assessment process; and viii. a description of the tasks that will be undertaken as part of the environmental impact assessment process; 	Chapter 7

Section of the EIA Regulations	Requirements for a Scoping Report in terms of Appendix 2 of the 2017 NEMA EIA Regulations (GN R326)	Chapter and sub-section
	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.	
Appendix 2 - (1)(i)	An undertaking under oath or affirmation by the EAP in relation to - i. the correctness of the information provided in the report; ii. the inclusion of comments and inputs from stakeholders and interested and affected parties; and iii. any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested or affected parties;	Appendix A
Appendix 2 - (1)(j)	An undertaking under oath or affirmation by the EAP in relation to the level of agreement between the EAP and interested and affected parties on the plan of study for undertaking the environmental impact assessment;	Appendix A
Appendix 2 - (1)(k)	Where applicable, any specific information required by the competent authority;	Appendix E
Appendix 2 - (1)(l)	Any other matter required in terms of section 24(4)(a) and (b) of the Act.	Not applicable at this stage

1. INTRODUCTION

The City of Cape Town (CoCT): Property Management Department in collaboration with GreenCape is proposing to develop a Green Technology Manufacturing facility (hereafter referred to as “GreenTech”) and associated infrastructure in the Atlantis Special Economic Zone (SEZ) on the land designated as Zone 2. Zone 2 is made up of several land portions that will comprise the “site”, namely ERF Portion Remainder of ERF 277, ERF 246, ERF 254 and ERF Portion Remainder of 171 (these are the new ERF numbers, previously known as portions of Cape Farm 1183), Atlantis Industrial, approximately 40 km north of Cape Town. The portions that comprise the site (i.e. Zone 2) make up a total of 32.6 ha which will be used for the proposed development. Figure 1.1 below shows the overall locality of the proposed GreenTech site considered in the Scoping Phase.

In terms of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) and the 2014 NEMA Environmental Impact Assessment (EIA) Regulations (as amended on 7 April 2017) promulgated in Government Gazette 40772 and Government Notice (GN) R327, R326, R325 and R324, a full Scoping and Environmental Impact Assessment (EIA) Process is required for the construction of the proposed Atlantis GreenTech facility. The Applicant has appointed the Council for Scientific and Industrial Research (CSIR) to undertake the EIA Processes in order to determine the biophysical, social and economic impacts associated with undertaking the proposed activity.

1.1. PROJECT APPLICANT AND PROJECT OVERVIEW

South Africa is an energy intensive country, largely as a result of our historic economic focus on energy intensive industries such as mining and primary metal processing. With current energy and electricity demands projected to continue increasing, new investments in electricity generation capacity are required. In terms of the New Generation Regulations, the Integrated Resource Plan (IRP), developed in March 2011, by the Department of Energy set out the new generation capacity requirement per technology, taking energy efficiency and the demand-side management projects into account. The introduction of private sector generation, as proposed in the Electricity Regulation Act (Act no. 4 of 2006), has multiple benefits and will contribute greatly to the diversification of both the supply and nature of energy production and enable the benchmarking of performance and pricing. The planned roll-out of renewable energy in South Africa will result in investments of R10-20 billion every year for the next 20 years. The manufacturing industry to support this renewable energy roll-out will be significant. It is estimated that about 2200 blue collar jobs will be created in this new industry. The Provincial strategic vision and intent is that the Western Cape has a secure supply of quality, reliable, clean, safe energy, which delivers social, economic and environmental benefits to the Province’s citizens, while also addressing the climate change challenges facing the region and eradicating energy poverty. The Western Cape Provincial Government and the City of Cape Town (CoCT) have joined together in support of the renewable energy industry. The CoCT has simplified the process for those in the renewable energy industry wishing to find sites suitable for manufacturing activities.

Atlantis has been identified as a development priority by National, Provincial and Regional government and will largely benefit from the creation of an established “Green Technology Manufacturing Cluster”. In addition, the CoCT will, for the majority, be leasing the land to company’s within the renewable energy sector and therefore the proposal is for the construction of manufacturing facilities to support the renewable energy industry and the broader “Green Economy”. The CoCT has made available Zone 2 for these purposes namely, the manufacturing and supply of utility-scale renewable energy to the national grid and associated ‘green’ technology industries e.g. producing turbine blades, turbine towers, turbine assemblers, PV panel assembly plants and inverter manufacturers etc. The proposal will therefore entail the utilisation of the entire site for industrial development. GreenCape is a sector development agency established by the CoCT and Western Cape Provincial Government with the task of unlocking and unblocking opportunities in the Green Economy, and are facilitating the development of GreenTech in the Atlantis SEZ.

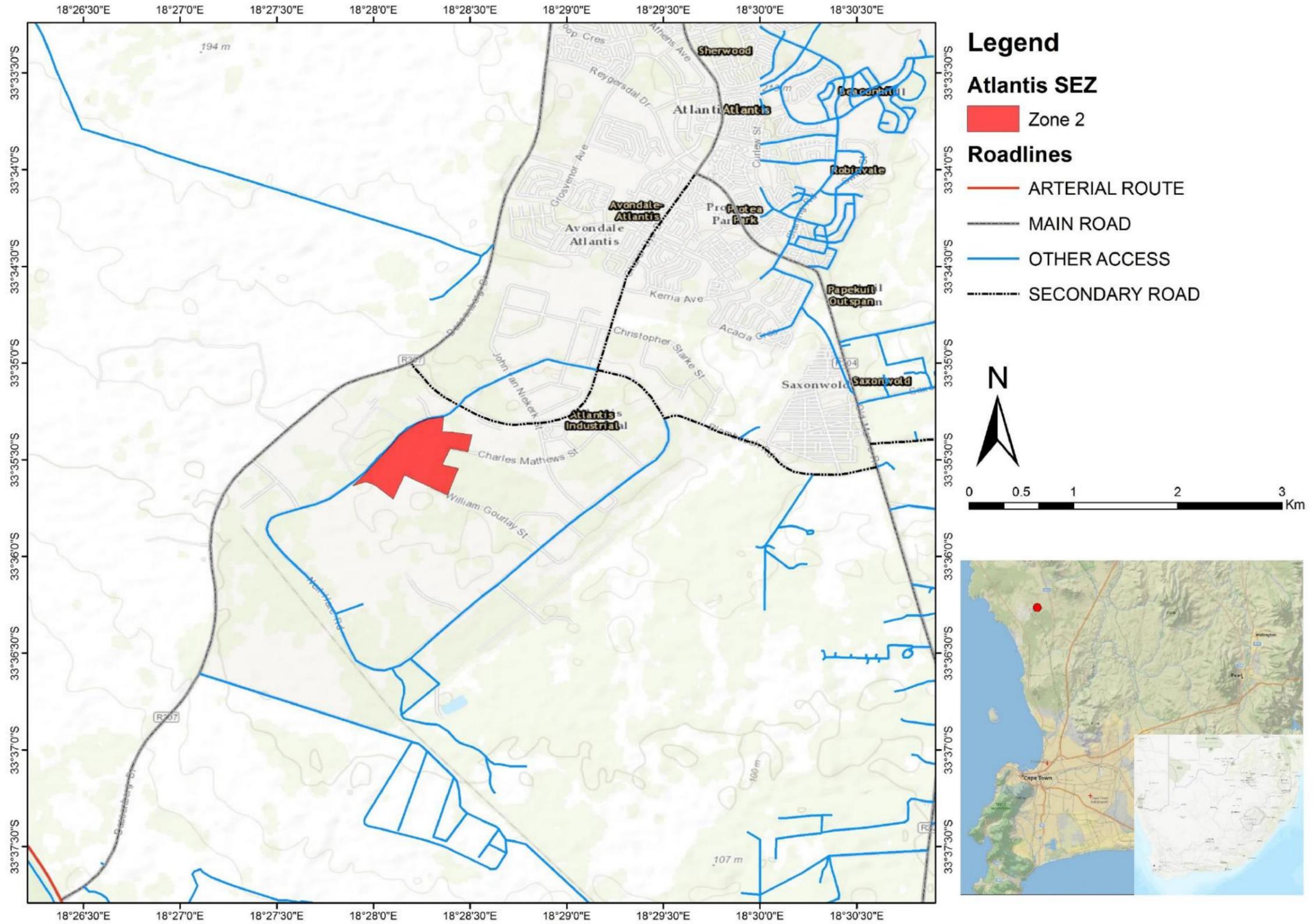


Figure 1.1: Locality of the Atlantis GreenTech site where the development is proposed (Zone 2)

1.2. PROJECT MOTIVATION (INCLUDING NEED AND DESIRABILITY)

GreenCape has been appointed as the project management office for the proposed special economic zone (SEZ) in Atlantis with the land owner and applicant for the proposed project being the City of Cape Town Metropolitan Municipality: Property Management Department (hereafter referred to as City of Cape Town). Special Economic Zones are geographically designated area of a country set aside for targeted industrial or economic activities which are supported through special arrangements and measures that often are not available to the rest of the country. It is expected that following the Department of Energy's request for information (RFI) from potential developers for proposals for GreenTech projects, it will play a significant role in South Africa's power generation mix. Special Economic Zones in South Africa, such as the Atlantis area, have the ability to accelerate the rate of industrial development and agglomeration and are a platform for guiding the deployment of other tools such as incentives, skills development and infrastructure development. The benefit of the proposed facility and its location and contribution to the greater Atlantis SEZ will furthermore allow for the increased focus on the development of desired industrial capabilities, "host regions" for development, and comprehensive planning and design to accommodate the diverse regional development needs and contexts.

The need for renewable energy (and associated technologies) is becoming increasingly apparent, in both local and international context, with South Africa becoming an integral part of the global transition towards renewable sources of electricity generation. The urgency behind this evolution can be appreciated considering that South Africa is the largest emitter of greenhouse gases in Africa, accounting for as much as 42% of the continent's total emissions, and is also estimated to rank amongst the top 20 largest emitters of greenhouse gases in the world. These emissions are largely a result of an energy-intensive economy and high dependence on coal-based electricity generation. The South African government is therefore committed to supplementing the existing generation capacity of thermal and nuclear power plants with renewable energy power generation, thus creating the framework that will lead to an increase in the supply of clean energy for the nation. The proposed project would also have international significance as it contributes to South Africa being able to meet some of its international obligations by aligning domestic policy with internationally agreed strategies and standards as set by the United Nations Framework Convention on Climate Change (UNFCCC), Kyoto Protocol, and United Nations Convention on Biological Diversity (UNCBD) all of which South Africa is a signatory to. Renewable energy is critical to South Africa as this source of energy is recognised as a major contribution to climate protection, has a much lower environmental impact, as well as advancing economic and social development.

The preferred site (i.e. Zone 2) for the proposed Atlantis GreenTech project includes approximately 32.6 ha of land. It may be possible that the final layout does not require the utilisation of the entire 32.6 ha, however, a potentially larger than required surface area has been proposed during this phase of the project to ensure that should development constraints be present, the footprint can be reduced without the project being compromised. A project description (based on the conceptual design) is provided in Chapter 2 of this Draft Scoping Report. Additional information regarding the project contextualisation is provided in Chapters 2 and 5 of this Scoping Report.

1.2.1. Need and Desirability

It is an important requirement in the EIA Process to review the need and desirability of the proposed project. Guidelines on Need and Desirability were published in the Government Gazette of 20 October 2014 (Department of Environmental Affairs). These guidelines list specific questions to determine need and desirability of proposed developments. This checklist is a useful tool in addressing specific questions relating to the need and desirability of a project and assists in explaining that need and desirability at the provincial and local context. Need and desirability answers the question of whether the activity is being proposed at the right time and in the right place. Table 1.2 includes a list of questions based on the DEA's Guideline to determine the need and desirability of the proposed project. It should be noted this table was informed by the outcomes of the Scoping and EIA Process.

Table 1.4: The Guideline on the Need and Desirability’s list of 14 questions to determine the “Need and Desirability” of a proposed project (Department of Environmental Affairs Guideline on Need and Desirability, March 2017)

NEED	
Question	Response
1. How will this development (and its separate elements/aspects) impact on the ecological integrity of the area)?	
<p>1.1. How were the following ecological integrity considerations taken into account?:</p> <ul style="list-style-type: none"> 1.1.1. Threatened Ecosystems, 1.1.2. Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure, 1.1.3. Critical Biodiversity Areas ("CBAs") and Ecological Support Areas ("ESAs"), 1.1.4. Conservation targets, 1.1.5. Ecological drivers of the ecosystem, 1.1.6. Environmental Management Framework, 1.1.7. Spatial Development Framework, and 1.1.8. Global and international responsibilities relating to the environment (e.g. RAMSAR sites, Climate Change, etc.). 	<p>The proposed activity will have an impact on the endangered and critically endangered vegetation found on site, which will be removed completely. However, the CoCT has confirmed land elsewhere to offset the Atlantis Industrial Area in the form of the Atlantis Industrial Incentives Scheme (refer to Appendix F) – so that it may be developed in future. An appropriate biodiversity offset will be agreed upon to balance the loss of the sensitive vegetation on this site which is located in the Atlantis Industrial Area.</p> <p>The specific environmental sensitivities present on site will be assessed within the ecological impact assessment to be undertaken during the EIA phase of this project. .</p> <p>The preliminary sensitivity map is included in Chapter 3 of this Scoping Report and will be further refined during the EIA Phase.</p>
<p>1.2. How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity? What measures were explored to firstly avoid these negative impacts, and where these negative impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</p>	<p>The environmental sensitivities present on site will be assessed within the ecological impact assessment to be undertaken during the EIA phase of this project.</p> <p>Measures to avoid, remedy, mitigate and manage impacts will be included within the Environmental Management Programme that will be compiled during the EIA Phase and included within the EIA Report.</p>
<p>1.3. How will this development pollute and/or degrade the biophysical environment? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</p>	<p>Measures to avoid, remedy, mitigate and manage impacts will be included within the Environmental Management Programme that will be compiled during the EIA Phase and included within the EIA Report.</p> <p>Please refer to Appendix F for information regarding the Atlantis Industrial Incentives scheme (offsetting biodiversity loss).</p>

NEED	
Question	Response
1.4. What waste will be generated by this development? What measures were explored to firstly avoid waste, and where waste could not be avoided altogether; what measures were explored to minimise, reuse and/or recycle the waste? What measures have been explored to safely treat and/or dispose of unavoidable waste?	Measures to avoid, remedy, mitigate and manage impacts will be included within the Environmental Management Programme that will be compiled during the EIA Phase and included within the EIA Report.
1.5. How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	A Heritage Assessment will be undertaken during the EIA Phase. A preliminary specialist Heritage profile is included in Chapter 3 of this Scoping Report and will be further refined during the EIA Phase.
1.6. How will this development use and/or impact on non-renewable natural resources? What measures were explored to ensure responsible and equitable use of the resources? How have the consequences of the depletion of the non-renewable natural resources been considered? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	Measures to avoid, remedy, mitigate and manage impacts will be included within the Environmental Management Programme that will be compiled during the EIA Phase and included within the EIA Report.
1.7. How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part? Will the use of the resources and/or impact on the ecosystem jeopardise the integrity of the resource and/or system taking into account carrying capacity restrictions, limits of acceptable change, and thresholds? What measures were explored to firstly avoid the use of resources, or if avoidance is not possible, to minimise the use of resources? What measures were taken to ensure responsible and equitable use of the resources? What measures were explored to enhance positive impacts?	The definition of a resource-efficient producer employs processes, products and services to increase the resource-efficiency of production and to reduce pollution and minimise negative impacts on humans and the environment. In summary, GreenTech refers to technologies that limit or prevent harm to the natural environment relative to conventional alternatives because they: <ul style="list-style-type: none"> • are less polluting and\or • use all natural resources in a more sustainable manner and\or • recycle more of their wastes and products and\or • handle residual wastes in a more acceptable manner.
1.7.1. Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth or does it reduce resource dependency (i.e. dematerialised growth)? (note: sustainability requires that settlements reduce their ecological footprint by	The proposed project will strive to not only supply GreenTech components to support the green economy but should itself be developed in a “green” and sustainable way. To achieve such an outcome, Sustainable Design Principles will be developed for the site.

NEED	
Question	Response
<p>using less material and energy demands and reduce the amount of waste they generate, without compromising their quest to improve their quality of life)</p> <p>1.7.2. Does the proposed use of natural resources constitute the best use thereof? Is the use justifiable when considering intra- and intergenerational equity, and are there more important priorities for which the resources should be used (i.e. what are the opportunity costs of using these resources of the proposed development alternative?)</p> <p>1.7.3. Do the proposed location, type and scale of development promote a reduced dependency on resources?</p>	
<p>1.8. How were a risk-averse and cautious approach applied in terms of ecological impacts?:</p> <p>1.8.1. What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?</p> <p>1.8.2. What is the level of risk associated with the limits of current knowledge?</p> <p>1.8.3. Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?</p>	<p>The precautionary approach has been adopted for this assessment, i.e. assuming the worst-case scenario will occur and then identifying ways to mitigate or manage these impacts.</p> <p>Current gaps in knowledge include the preferred technology to be used and the number of other facilities that will be developed around this site. Ways in which these gaps are addressed is to consider all types of technologies as part of the assessment and to consider the cumulative impact of all facilities being developed within the area.</p>
<p>1.9. How will the ecological impacts resulting from this development impact on people's environmental right in terms following:</p> <p>1.9.1. Negative impacts: e.g. access to resources, opportunity costs, loss of amenity (e.g. open space), air and water quality impacts, nuisance (noise, odour, etc.), health impacts, visual impacts, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?</p> <p>1.9.2. Positive impacts: e.g. improved access to resources, improved amenity,</p>	<p>Atlantis has been identified by the City of Cape Town as a development priority node to revitalize the area. In recent years this initiative was been strongly supported by National and Provincial Government leading to a collaborative effort to establish a Green -Technology Special Economic Zone. This will unlock green economy opportunities to create local jobs, boost green-tech manufacturing, technology transfer and skills development to benefit the local community in Atlantis and surrounding areas. Historically, Atlantis was a decentralised zone for manufacturing. The proposed activity within the Atlantis Industrial Area will therefore benefit from the SEZ. The designated SEZ sites in Atlantis will be a priority area through which the path will be laid for future investments. The socio-economic benefits associated with the proposed development will</p>

NEED	
Question	Response
improved air or water quality, etc. What measures were taken to enhance positive impacts?	<p>have significant positive long-term benefits for Atlantis and the Western Cape.</p> <p>In terms of other impacts: Noise: There may be noise associated with this development during its operation and the impacts, however, this will be in line with the zoning regulations of the site. Odours: These will be minimal during the construction phase and relatively minimal during the operational phase. Visual Character and Sense of Place: The proposed activity involves the construction of an industrial development within the Atlantis Industrial Area. The context within which the site is located is already characterised by industrial buildings and therefore will not have a significant impact on the visual character or sense of place of the area.</p>
1.10. Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socio-economic impacts (e.g. on livelihoods, loss of heritage site, opportunity costs, etc.)?	This will be considered as part of the desktop review of previous social assessments undertaken in the area for similar types of projects.
1.11. Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives / targets / considerations of the area?	This will be considered as part of the desktop review of previous social assessments undertaken in the area for similar types of projects.
1.12. Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the "best practicable environmental option" in terms of ecological considerations?	Please refer to Chapter 5 of this Scoping Report.
1.13. Describe the positive and negative cumulative ecological/biophysical impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and existing and other planned developments in the area?	Please refer to Chapter 6 of this Scoping Report.
2.1. What is the socio-economic context of the area, based on, amongst other considerations, the following considerations?:	

NEED	
Question	Response
<p>2.1.1. The IDP (and its sector plans' vision, objectives, strategies, indicators and targets) and any other strategic plans, frameworks of policies applicable to the area,</p>	<p>The purpose of the Western Cape's Provincial Spatial Development Framework (PSDF) is to:</p> <ul style="list-style-type: none"> • Be the spatial expression of the Provincial Growth and Development Strategy (PGDS). • Guide (metropolitan, district and local) municipal integrated development plans (IDPs) and spatial development frameworks (SDFs) and provincial and municipal framework plans (ie. sub- SDF spatial plans). • Help prioritise and align investment and infrastructure plans of other provincial departments, as well as national departments' and parastatals' plans and programmes in the Province. • Provide clear signals to the private sector about desired development directions. • Increase predictability in the development environment, for example by establishing no-go, conditional and "go" areas for development and redress the spatial legacy of apartheid. <p>The establishment of a GreenTech facility and SEZ in Atlantis will promote the area for further investment, stimulate and contribute towards the economy as well as created a number of much needed blue-collar jobs within the area. These goals/ outcomes that will result from the proposed development are in line with the 5 year plan for the municipality.</p> <p>In addition the proposed facility is in line with Spatial Development Objective (1) of the Blaauwberg District Plan (2012) which relates to the promotion of infill industrial development.</p>
<p>2.1.2. Spatial priorities and desired spatial patterns (e.g. need for integrated of segregated communities, need to upgrade informal settlements, need for densification, etc.),</p>	<p>N/A the proposed project is located within an industrial area and the site is zoned "General Industrial"</p>
<p>2.1.3. Spatial characteristics (e.g. existing land uses, planned land uses, cultural landscapes, etc.)</p>	<p>the location factors favour this land use for a number of reasons e.g.:</p> <ul style="list-style-type: none"> • The site is already zoned 'General Industrial' and is located inside the Atlantis Industrial Area (within the Urban Edge). • Atlantis is considered a national, provincial and regional priority area for readdressing the eras of apartheid through encouraging investment in the area and, as a result, creating jobs and contributing towards the local economy. • The size of the land is appropriate in that

NEED	
Question	Response
	<p>they are large enough for the types of industries proposed.</p> <ul style="list-style-type: none"> • The road network in the area is also much more appropriate for transporting abnormal loads rather than navigating city traffic and passes. • Easy, quick access onto the N7 allowing easier access to port facilities along the West Coast. <p>The proposed development is in line with all the planning policies for the CoCT and the greater WC province.</p>
2.1.4. Municipal Economic Development Strategy ("LED Strategy").	The establishment of a GreenTech facility and SEZ in Atlantis will promote the area for further investment, stimulate and contribute towards the economy as well as created a number of much needed blue-collar jobs within the area. These goals/ outcomes that will result from the proposed development are in line with the 5 year plan for the municipality.
2.2. Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area?	Atlantis has been identified by the City of Cape Town as a development priority node to revitalize the area. In recent years this initiative was been strongly supported by National and Provincial Government leading to a collaborative effort to establish a Green -Technology Special Economic Zone. This will unlock green economy opportunities to create local jobs, boost green-tech manufacturing, technology transfer and skills development to benefit the local community in Atlantis and surrounding areas.
2.2.1. Will the development complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programs?	
2.3. How will this development address the specific physical, psychological, developmental, cultural and social needs and interests of the relevant communities?	
2.4. Will the development result in equitable (intra- and inter-generational) impact distribution, in the short- and long term? Will the impact be socially and economically sustainable in the short- and long-term?	
2.5. In terms of location, describe how the placement of the proposed development will:	
2.5.1. result in the creation of residential and employment opportunities in close proximity to or integrated with each other,	Developments such as the Atlantis GreenTech facility have been stipulated in the CoCT's IDP 5 year plan. In addition, the biodiversity offset put in place by the CoCT for the Atlantis SEZ to compensate for the loss of biodiversity and to promote industrial development in that area

NEED	
Question	Response
	<p>allows for immediate development to happen in this area with a significantly reduced ecosystem cost. There are also a number of positive socio-economic benefits will result as a direct and indirect effect of this activity. The most notable being:</p> <ul style="list-style-type: none"> • Job Creation. • Growth of the local, regional and provincial economies. • Diversity in the manufacturing industry through the investment in the energy sector.
2.5.2. reduce the need for transport of people and goods,	<p>Atlantis has been identified by the City of Cape Town as a development priority node to revitalize the area. In recent years this initiative was been strongly supported by National and Provincial Government leading to a collaborative effort to establish a Green -Technology Special Economic Zone. This will unlock green economy opportunities to create local jobs, boost green-tech manufacturing, technology transfer and skills development to benefit the local community in Atlantis and surrounding areas. Historically, Atlantis was a decentralised zone for manufacturing. The proposed activity within the Atlantis Industrial Area will therefore benefit from the SEZ. The designated SEZ sites in Atlantis will be a priority area through which the path will be laid for future investments. The socio-economic benefits associated with the proposed development will have significant positive long-term benefits for Atlantis and the Western Cape.</p>
2.5.3. result in access to public transport or enable non-motorised and pedestrian transport (e.g. will the development result in densification and the achievement of thresholds in terms public transport),	
2.5.4. compliment other uses in the area,	
2.5.5. be in line with the planning for the area,	
2.5.6. for urban related development, make use of underutilised land available with the urban edge,	
2.5.7. optimise the use of existing resources and infrastructure,	
2.5.8. opportunity costs in terms of bulk infrastructure expansions in non-priority areas (e.g. not aligned with the bulk infrastructure planning for the settlement that reflects the spatial reconstruction priorities of the settlement),	

NEED	
Question	Response
	<p>pumps will have to be installed by the developer.</p> <p><u>Stormwater:</u> The pipe network in the adjacent municipal roads is designed to take the predevelopment 1:2 year recurrence interval storm run-off for low traffic volumes areas to 1:10 year recurrence interval storm run-off for prime commercial developments. The balance of the run-off is conveyed within defined overland flow routes utilising streets to discharge into green belts comprising parks and playing fields where flood peak attenuation techniques are applied in accordance with the CoCT’s Management of Urban Storm Water Impacts Policy” document.</p> <p><u>Electrical:</u> The City of Cape Town is the supplier of electricity to the Atlantis Industrial area. The security of electricity supply in Atlantis industrial has improved significantly in order to encourage development. The CoCT invested roughly R114 million on electricity supply upgrades for Atlantis. These upgrades added to the Eskom upgrades and have increased the power supply to the area by approximately 90 MVA, totalling 170 MVA supply in the area. It is also potentially proposed that <u>alternative renewable energy sources</u> will be considered, i.e. photovoltaic (PV) panels, to provide electricity directly into the building (depending on energy requirements).</p>
2.5.9. discourage "urban sprawl" and contribute to compaction/densification,	N/A the proposed project is located within an industrial area and the site is zoned “General Industrial”
2.5.10. contribute to the correction of the historically distorted spatial patterns of settlements and to the optimum use of existing infrastructure in excess of current needs,	N/A the proposed project is located within an industrial area and the site is zoned “General Industrial”
2.5.11. encourage environmentally sustainable land development practices and processes,	<p>The definition of a resource-efficient producer employs processes, products and services to increase the resource-efficiency of production and to reduce pollution and minimise negative impacts on humans and the environment. In summary, GreenTech refers to technologies that limit or prevent harm to the natural environment relative to conventional alternatives because they:</p> <ul style="list-style-type: none"> • are less polluting and\or • use all natural resources in a more sustainable manner and\or • recycle more of their wastes and products

NEED	
Question	Response
	<p>and/or</p> <ul style="list-style-type: none"> handle residual wastes in a more acceptable manner. <p>The proposed project will strive to not only supply GreenTech components to support the green economy but should itself be developed in a “green” and sustainable way. To achieve such an outcome, Sustainable Design Principles will be developed for the site.</p>
2.5.12. take into account special locational factors that might favour the specific location (e.g. the location of a strategic mineral resource, access to the port, access to rail, etc.),	Please refer to Chapter 2 for a description of the process undertaken to identify the site is a preferred site for the proposed Facility
2.5.13. the investment in the settlement or area in question will generate the highest socio-economic returns (i.e. an area with high economic potential),	This will be considered as part of the desktop review of previous social assessments undertaken in the area for similar types of projects.
2.5.14. impact on the sense of history, sense of place and heritage of the area and the socio-cultural and cultural-historic characteristics and sensitivities of the area, and	The impact on sensitive natural areas would be limited (however, this would need to be confirmed and determined as part of the EIA Phase of the proposed project). The impact of the proposed project on cultural/heritage areas (archaeology and palaeontology) will be assessed as part of the EIA Phase. Based on assessments that were done for the adjacent projects, these impacts on heritage resources are not anticipated to be significant.
2.5.15. in terms of the nature, scale and location of the development promote or act as a catalyst to create a more integrated settlement?	Traditionally SEZs geographically delineated and fenced- in areas that allowed for the duty- and tax-free import of raw and intermediate materials for processing and re-export. SEZ’s in South Africa, such as the Atlantis Industrial area ¹ , have the ability to accelerate the rate of industrial development and agglomeration and are a platform for guiding the deployment of other tools such as incentives, skills development and infrastructure development.
2.6. How were a risk-averse and cautious approach applied in terms of socio-economic impacts?	
2.6.1. What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?	This will be considered as part of the desktop review of previous social assessments undertaken for the SEZ as well as previous social impact assessments for projects nearby the site.
2.6.2. What is the level of risk (note: related	

¹ The Atlantis SEZ was adopted on 19 October 2018, Government Gazette 41982, Regulation No. 1130

NEED	
Question	Response
<p>to inequality, social fabric, livelihoods, vulnerable communities, critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge?</p>	
<p>2.6.3. Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?</p>	
<p>2.7. How will the socio-economic impacts resulting from this development impact on people's environmental right in terms following:</p>	
<p>2.7.1. Negative impacts: e.g. health (e.g. HIV-Aids), safety, social ills, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?</p>	<p>Objective 1.1 of the IDP is to “create an enabling environment to attract investment that generates economic growth and job opportunities. There is considerable space for investment and growth, now and into the future in the Atlantis SEZ. The City plays a pivotal role in creating demand for these services through its programmes, projects and procurement systems, as well as through the use of energy in its own operations. The City aims to promote small-scale embedded power generation in Cape Town as well as to ensure that it benefits from regional and national-scale projects where suitable. The City faces skills development challenges, and requires significant investment, land release and buy-in from various stakeholders. There are opportunities for sustainable industries (such as solar water heater, photovoltaic and wind turbine manufacturers), who’s services and products will be required for many years. This can result in job creation and skills development from new businesses.”</p> <p>Atlantis has been identified by the City of Cape Town as a development priority node to revitalize the area. In recent years this initiative was been strongly supported by National and Provincial Government leading to a collaborative effort to establish a Green -Technology Special Economic Zone. This will unlock green economy opportunities to create local jobs, boost green-tech manufacturing, technology transfer and skills development to benefit the local community in Atlantis and surrounding areas. Historically, Atlantis was a decentralised zone for manufacturing. The proposed activity within the Atlantis Industrial Area will therefore benefit from the SEZ. The designated SEZ sites in Atlantis will</p>
<p>2.7.2. Positive impacts. What measures were taken to enhance positive impacts?</p>	
<p>2.8. Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development's socioeconomic impacts will result in ecological impacts (e.g. over utilisation of natural resources, etc.)?</p>	
<p>2.9. What measures were taken to pursue the selection of the "best practicable environmental option" in terms of socio-economic considerations?</p>	
<p>2.10. What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)? Considering the need for social equity and justice, do the alternatives identified, allow the "best practicable environmental option" to be selected, or is there a need for other alternatives to be considered?</p>	
<p>2.11. What measures were taken to pursue equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination?</p>	

NEED	
Question	Response
2.12. What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle?	<p>be a priority area through which the path will be laid for future investments. The socio-economic benefits associated with the proposed development will have significant positive long-term benefits for Atlantis and the Western Cape</p> <p>This will be further considered as part of the desktop review of previous social assessments undertaken for the SEZ as well as previous social impact assessments for projects nearby the site.</p>
2.13. What measures were taken to:	
2.13.1. ensure the participation of all interested and affected parties,	The PPP to be undertaken as part of the Scoping and EIA process is included in this Draft Scoping Report. Various methods have been employed to notify potential (I&APs) of the proposed project, namely, through adverts, sites notices on site and notification letters.
2.13.2. provide all people with an opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation,	
2.13.3. ensure participation by vulnerable and disadvantaged persons,	
2.13.4. promote community wellbeing and empowerment through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means,	The EIA process will take cognisance of all interests, needs and values espoused by all interested and affected parties. Opportunity for public participation will be provided to all I&APs throughout the EIA process in terms of the 2014 EIA Regulations, as amended.
2.13.5. ensure openness and transparency, and access to information in terms of the process,	The PPP to be undertaken as part of the Scoping and EIA process have been included within the Draft Scoping Report. Various methods will be employed to notify potential I&APs of the proposed project, namely, through adverts, sites notices on site and notification letters.
2.13.6. ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition were given to all forms of knowledge, including traditional and ordinary knowledge,	The EIA process will take cognisance of all interests, needs and values adopted by all interested and affected parties.
2.13.7. ensure that the vital role of women and youth in environmental management and development were recognised and their full participation therein was promoted.	Public participation of all I&APs has been promoted and opportunities for engagement will be provided during the EIA process.
2.14. Considering the interests, needs and values of all the interested and affected parties, describe how the development will allow for opportunities for all the segments of the community (e.g. a	This will be further considered as part of the desktop review of previous social assessments undertaken for the SEZ as well as previous social impact assessments for projects nearby the site

NEED	
Question	Response
mixture of low-, middle-, and high-income housing opportunities) that is consistent with the priority needs of the local area (or that is proportional to the needs of an area)?	
2.15. What measures have been taken to ensure that current and/or future workers will be informed of work that potentially might be harmful to human health or the environment or of dangers associated with the work, and what measures have been taken to ensure that the right of workers to refuse such work will be respected and protected?	An EMPr will be developed to address health and safety concerns. An Environmental Control Officer will be appointed to monitor compliance.
2.16. Describe how the development will impact on job creation in terms of, amongst other aspects:	
2.16.1. the number of temporary versus permanent jobs that will be created,	This has been described in Chapter 2 and 3 and will be further considered as part of the desktop review of previous social assessments undertaken for the SEZ as well as previous social impact assessments for projects nearby the site.
2.16.2. whether the labour available in the area will be able to take up the job opportunities (i.e. do the required skills match the skills available in the area),	
2.16.3. the distance from where labourers will have to travel,	
2.16.4. the location of jobs opportunities versus the location of impacts (i.e. equitable distribution of costs and benefits),	
2.16.5. the opportunity costs in terms of job creation (e.g. a mine might create 100 jobs, but impact on 1000 agricultural jobs, etc.).	
2.17. What measures were taken to ensure:	
2.17.1. that there were intergovernmental coordination and harmonisation of policies, legislation and actions relating to the environment,	South Africa is an energy intensive country, largely as a result of our historic economic focus on energy intensive industries such as mining and primary metal processing. With current energy and electricity demands projected to continue increasing, new investments in electricity generation capacity are required, resulting in the need for technological manufacturing. Future increases in electricity demand are particularly expected for the regions around the Western Cape. In terms of the New Generation Regulations, the Integrated Resource Plan (IRP) that has been developed in 2011 by the Department of Energy and sets out the new generation capacity requirement per technology, taking energy efficiency and the demand-side
2.17.2. that actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures?	

NEED	
Question	Response
	management projects into account. The introduction of private sector generation has multiple benefits and will contribute greatly to the diversification of both the supply and nature of energy production and enable the benchmarking of performance and pricing.
2.18. What measures were taken to ensure that the environment will be held in public trust for the people, that the beneficial use of environmental resources will serve the public interest, and that the environment will be protected as the people's common heritage?	To be determined during the EIA Phase
2.19. Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left?	To be determined during the EIA Phase
2.20. What measures were taken to ensure that the costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects will be paid for by those responsible for harming the environment?	To be determined during the EIA Phase and will be covered in the EMPr.
2.21. Considering the need to secure ecological integrity and a healthy bio-physical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the best practicable environmental option in terms of socio-economic considerations?	<p>It would be premature to decide on the environmental practicability of the proposed development prior to the completion of the impact assessment phase of this EIA Process, however, based on current information and specialist studies that have already been conducted on nearby sites, the location factors favour this land use for a number of reasons e.g.:</p> <ul style="list-style-type: none"> • The site is already zoned 'General Industrial' and is located inside the Atlantis Industrial Area (within the Urban Edge). • Atlantis is considered a national, provincial and regional priority area for readdressing the eras of apartheid through encouraging investment in the area and, as a result, creating jobs and contributing towards the local economy. • The size of the land is appropriate in that they are large enough for the types of industries proposed. • The road network in the area is also much more appropriate for transporting abnormal loads rather than navigating city traffic and passes. • Easy, quick access onto the N7 allowing easier access to port facilities along the

NEED	
Question	Response
	West Coast. The proposed development is in line with all the planning policies for the CoCT and the greater WC province.
2.22. Describe the positive and negative cumulative socio-economic impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and other planned developments in the area?	The potential cumulative impacts resulting from the proposed project can only be objectively determined at the end of the EIA Process. These will be assessed as part of the EIA. Similar types of projects that are being undertaken or are proposed to be undertaken.

1.3. REQUIREMENTS FOR AN ENVIRONMENTAL IMPACT ASSESSMENT

In terms of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) and the 2014 NEMA Environmental Impact Assessment (EIA) Regulations (as amended on 7 April 2017) promulgated in Government Gazette 40772 and Government Notice (GN) R327, R326, R325 and R324, a full Scoping and Environmental Impact Assessment (EIA) Process is required for the construction of the proposed Atlantis GreenTech facility. The need for the full Scoping and EIA is triggered by, amongst others, the inclusion of Activity 15 listed in GN R325 (Listing Notice 2):

*“15. The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for—
(i) the undertaking of a linear activity; or
(ii) maintenance purposes undertaken in accordance with a maintenance management plan.”*

Chapter 4 of this Scoping Report contains the detailed list of activities contained in R327, R325 and R324 which may be triggered by the various project components and thus form part of this Scoping and EIA Process. The purpose of the EIA is to identify, assess and report on any potential impacts the proposed project, if implemented, may have on the receiving environment. The environmental assessment therefore needs to show the Competent Authority (i.e. the DEA&DP), and the project proponent, CoCT, what the consequences of their choices will be in terms of impacts on the biophysical and socio-economic environment and how such impacts can be, as far as possible, enhanced or mitigated and managed as the case may be.

1.4. EIA TEAM

As previously noted, the CSIR has been appointed by CoCT and GreenCape to undertake the EIA required for the proposed project. A public participation process (PPP) forms an integral part of the Environmental Assessment Process and assists in identifying issues and possible alternatives to be considered during the EIA Process. The CSIR is undertaking the PPP for this EIA. Details on the PPP are included in Chapter 4 of this Scoping Report. The EIA team which is involved in this Scoping and EIA Process is listed in Table 1.3 below. This team includes a number of specialists which have either been involved to date, or are planned to provide inputs during the EIA Process.

Table 1.3: The EIA Management Team and Specialist Team

NAME	ORGANISATION	ROLE/STUDY TO BE UNDERTAKEN
<i>Environmental Management Services (CSIR)</i>		
Paul Lochner	CSIR	Technical Advisor and Quality Assurance (EAPSA) Certified
Kelly Stroebel	CSIR	Project Manager (Appointed EAP)
Rirhandzu Marivate	CSIR	Project Officer and GIS specialist
<i>Specialists</i>		
Paul Emms	Bergwind Botanical Surveys and Tours	Ecological Impact Assessment (including Terrestrial Ecology)
Christo Bredenhann	WSP	Traffic Impact Statement
Jonathan Kaplan	Agency for Cultural Resource Management (ACRM)	Heritage Impact Assessment
John Pether	N/A	Desktop Palaeontological Impact Assessment

Note: ToR's for Specialist Studies as well as a description of the use of extensive existing information in the area is described further in Chapter 7 of this Scoping Report.

1.5. DETAILS AND EXPERTISE OF THE EAP

Over the past 30 years the CSIR has been involved in a multitude of projects across Africa and South Africa, with experience in 32 sub-Saharan African and Indian Ocean Island countries. The Environmental Management Services (EMS) group within the CSIR has been involved in the management and execution of numerous environmental assessment and management studies in more than 15 countries in Africa, as well as the Middle East, South America and Russia. These studies have included both public and private sector clients. Consequently, the CSIR EMS team offers a wealth of experience and appreciation of the environmental and social priorities and national policies and regulations in South Africa. The EMS team at CSIR has also been involved in environmental assessments in the Atlantis SEZ (including an EIA on the neighbouring site and EA amendments in the SEZ).

The EIA Project Team is being led by the Project Manager, Kelly Stroebel. Paul Lochner will act as A Technical Advisor for the proposed project. Rirhandzu Marivate will be providing support on the project as a project officer/assistant and GIS expertise. Refer to Appendix A of this Scoping Report for the Curriculum Vitae of the EAPs. Appendix A of this Scoping Report also includes a declaration of and affirmation by the EAP as required by the 2014 EIA Regulations (as amended). The following roles and responsibilities are assigned in terms of this Scoping and EIA Process:

Designated Environmental Assessment Practitioner (EAP):

Kelly Stroebel - Kelly is an EAP in the EMS group of the CSIR and she has an Honours degree in Environmental Science and is a Registered Candidate Natural Scientist (Registration Number: 100151/14) with the SACNASP. She has 5 years of experience in the Environmental Management field, and has been involved in various Basic Assessments, EIA's and SEA's in the infrastructure, agriculture and renewable energy fields. She has also worked on environmental assessments in the Atlantis SEZ.

Technical Advisor:

Paul Lochner - Paul has 22 years of experience in environmental assessment and management studies, primarily in the leadership and integration functions. This has included SEAs, EIAs and Environmental Management Plans.

In July 2003, he obtained certification as a registered EAP with the Interim Certification Board for EAPs of South Africa (EAPSA).

Project Officer:

Rirhandzu Marivate – Rirhandzu is an EAP in the EMS group of the CSIR holds a Bachelor degree in Zoology & Geology, Honours in Ecology, Environment and Conservation from the University of the Witwatersrand; and has environmental research experience with the University of Cape Town. She has 5 years' experience in various forms of environmental assessments (BAs, EIAs, SEAs); consultation with stakeholders and public meetings; Project administration and GIS for EIA's.

1.6. OBJECTIVES OF THE SCOPING REPORT

The Scoping Phase of the EIA refers to the process of determining the spatial and temporal boundaries for the EIA. In broad terms, the objectives of the Scoping Process in terms of the 2014 NEMA EIA Regulations (as amended) (GN R326) are to:

- Confirm the process to be followed and opportunities for stakeholder engagement;
- Clarify the project scope to be covered;
- Identify and confirm the preferred activity and technology alternative;
- Identify and confirm the preferred site for the preferred activity;
- Identify the key issues to be addressed in the impact assessment phase and the approach to be followed in addressing these issues; and
- Confirm the level of assessment to be undertaken during the impact assessment

This is achieved through parallel initiatives of consulting with:

- The lead authorities involved in the decision-making for this EIA application;
- The public to ensure that local issues are well understood; and
- The EIA specialist team to ensure that technical issues are identified.

The Scoping Process is supported by a review of relevant background literature on the local area. Through this comprehensive process, the environmental assessment can identify and focus on key issues requiring assessment. The primary objective of the Final Scoping Report is to present the Competent Authority with an overview of the project and key issues that require assessment in the EIA Phase and allow the opportunity for the identification of additional issues that may require assessment.

Issues raised in response to the pre-application version of the Draft Scoping Report have been captured in the Comments and Responses Trail which has been included in this Draft Scoping Report (Appendix E) and Plan of Study for EIA. The FSR will be submitted to DEAD&DP for decision-making (i.e. approval or rejection) in line with Regulation 21 (1) of GN R326. This approval is planned to mark the end of the Scoping Phase after which the EIA Process moves into the impact assessment and reporting phase.

In terms of legal requirements, a crucial objective of the Scoping Report is to satisfy the requirements of Appendix 2 of the 2014 NEMA EIA Regulations (as amended on 7 April 2017) (as noted in Regulation 21 (3) of the GN R326). This section regulates and prescribes the content of the Scoping Report and specifies the type of supporting information that must accompany the submission of the Scoping Report to the authorities. An overview of where the requirements of Appendix 2 of the 2014 NEMA EIA Regulations (as amended) are addressed in this Final Scoping Report is presented in Table 1.3. Furthermore, this process is designed to satisfy the requirements of Regulations 41, 42, 43 and 44 of the 2014 NEMA EIA Regulations (as amended) relating to the PPP and, specifically, the registration of and submissions from I&APs.

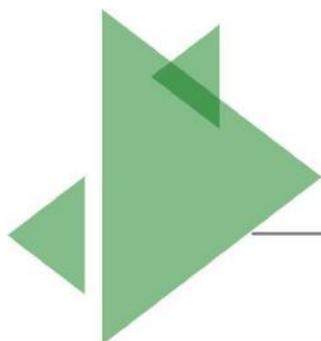
Scoping and Environmental Impact Assessment (EIA) for GreenTech in Zone 2
of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

DRAFT SCOPING REPORT



CHAPTER 2

PROJECT DESCRIPTION



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2. PROJECT DESCRIPTION

This chapter provides an overview of the conceptual project design and an overview of the site and technology selection process for the proposed Atlantis GreenTech facility.

The purpose of this chapter is to present sufficient project information to inform the EIA Process in terms of design parameters applicable to the project. It is important to note that the project description details are preliminary at this stage and it is likely that some of the details presented herein may change during the detailed design phase and upon further investigations (including the findings and input of the specialist studies conducted during the EIA Phase of the proposed project). However, the project description (and design) used in this EIA Process assumes a worst-case scenario, where the maximum development footprint and requisite infrastructure is considered. Consequently, should any changes in project design be affected; such changes will only serves to reduce the overall infrastructure requirement and/or development footprint.

2.1. ATLANTIS SEPCIAL ECONOMIC ZONE (SEZ) AND “GREENTECH”

A Special Economic Zone (SEZ) is an economic development tool to promote national economic growth and export by using targeted support measures to attract foreign and domestic investments and technology. Traditionally SEZs geographically delineated and fenced- in areas that allowed for the duty- and tax-free import of raw and intermediate materials for processing and re-export. Modern forms of SEZs are not exclusively export focused and can encompass larger areas and support a wider range of economic activities or have a specific technology or sector focus. The new SEZ Policy headed by the Department of Trade and Industry provides a clear framework for development, operation and management. The policy provides a wide range of incentives to expand the focus of strategic industrialisation to cover diverse regional development needs and context; to provide a clear, predictable and systemic planning framework for the development of a wider array of SEZs to support industrial policy objectives. The Industrial Policy Action Plan (IPAP), NDP and the NGP, clarify and strengthen governance arrangements and expand the range and quality of support measures beyond the provision of infrastructure. They also provide a framework for predictable financing to enable long-term planning. SEZ's in South Africa, such as the Atlantis Industrial area, and have the ability to accelerate the rate of industrial development and agglomeration. They are a platform for guiding the deployment of other tools such as incentives, skills development and infrastructure development. Incentives that are available to investors include VAT and Custom Relief linked to a customed-controlled area, Employment Tax Incentive (ETI), Building Allowance and Reduced Corporate Income Tax Rate.

SEZ's in South Africa, such as the Atlantis Industrial area¹, have the ability to accelerate the rate of industrial development and agglomeration and are a platform for guiding the deployment of other tools such as incentives, skills development and infrastructure development. In the Government Gazette of 20 March 2015, the Minister of Trade and Industry (Dr Rob Davies) issued the Special Economic Zones Regulations for public comment. Within these SEZs, support measures and funding are to be provided to businesses.

GreenTech can be defined as technology whose use is intended to mitigate or reverse the effects of human activity on the environment. The GreenTech definition includes, but is not limited, technologies relating to:

- Renewable energy,
- Energy-efficiency,
- Water efficiency and management,
- Greener packaging,
- Recycling,
- Green Chemicals etc.

¹ The Atlantis SEZ was adopted on 19 October 2018, Government Gazette 41982, Regulation No. 1130

The definition of a resource-efficient producer employs processes, products and services to increase the resource-efficiency of production and to reduce pollution and minimise negative impacts on humans and the environment. In summary, GreenTech refers to technologies that limit or prevent harm to the natural environment relative to conventional alternatives because they:

- are less polluting and/or
- use all natural resources in a more sustainable manner and/or
- recycle more of their wastes and products and/or
- handle residual wastes in a more acceptable manner.

GreenCape is an independent sector development agency working collaboratively with the City of Cape Town and the Western Cape Government to support the growth of the green economy in the province. GreenCape has been appointed as the project management office for the proposed Special Economic Zone (SEZ) in Atlantis, which has a total land area of 118.6 ha and consists of zones 1, 2, 3 and 4. SEZ's are geographically designated areas of a country set aside for targeted industrial or economic activities which are supported through special arrangements and measures that often are not available to the rest of the country.

Following the approved allocation of 68 ha of greenfield sites in the Atlantis SEZ for the development of a green industrial park by the Council for the City of Cape Town Municipality (CoCT); a number of land portions have been made available for a Green Technology (GreenTech) hub, of which **Zone 2** (See Figure 2.1 below) is relevant to this project.

2.2. SITE SELECTION

Zone 2 (i.e. the site) consists of ERF portion remainder of 277, ERF 246, ERF 254 and portion remainder of 171, is bordered by Neil Hare road to the South, Neil Hare road to the North, Gideon Basson to the West and Charl Uys on the East. It is envisaged that the entire site (32.6 ha) will be used for the development. The following table summarizes the land portions comprising the total site for the proposed project.

Table 2.1: Land Portions and sizes that comprise the site (i.e. Zone 2 of the Atlantis SEZ)

ATLANTIS SEZ ZONE	OLD ERF NUMBER	NEW ERF NUMBER	SIZE (ha)
2	CA1183-4	Portion Rem of 277	9.6
	CA1183-45	246	4.0
	CA1183-122	254	3.0
	CA1183-0	Portion Rem of 171	16.0
TOTAL HECTARES			32.6
CENTRE CO-ORDINATES OF THE ACTIVITY			33.59157°S 18.47060°E

Note: Although CA1183-74 is included in Zone 2, **it does not form part of this EIA**, as this portion is already utilised by PEGAS.

Table 2.2: SG codes for the land portions that comprise the site (i.e. Zone 2 of the Atlantis SEZ)

ERF NUMBER	SURVEYOR GENERAL (SG) 21 DIGIT CODE FOR THE LAND PARCEL
Portion Rem of 277	C01600000000118300004
246	C01600000000118300045
254	C01600000000118300122
Portion Rem of 171	C01600000000118300000

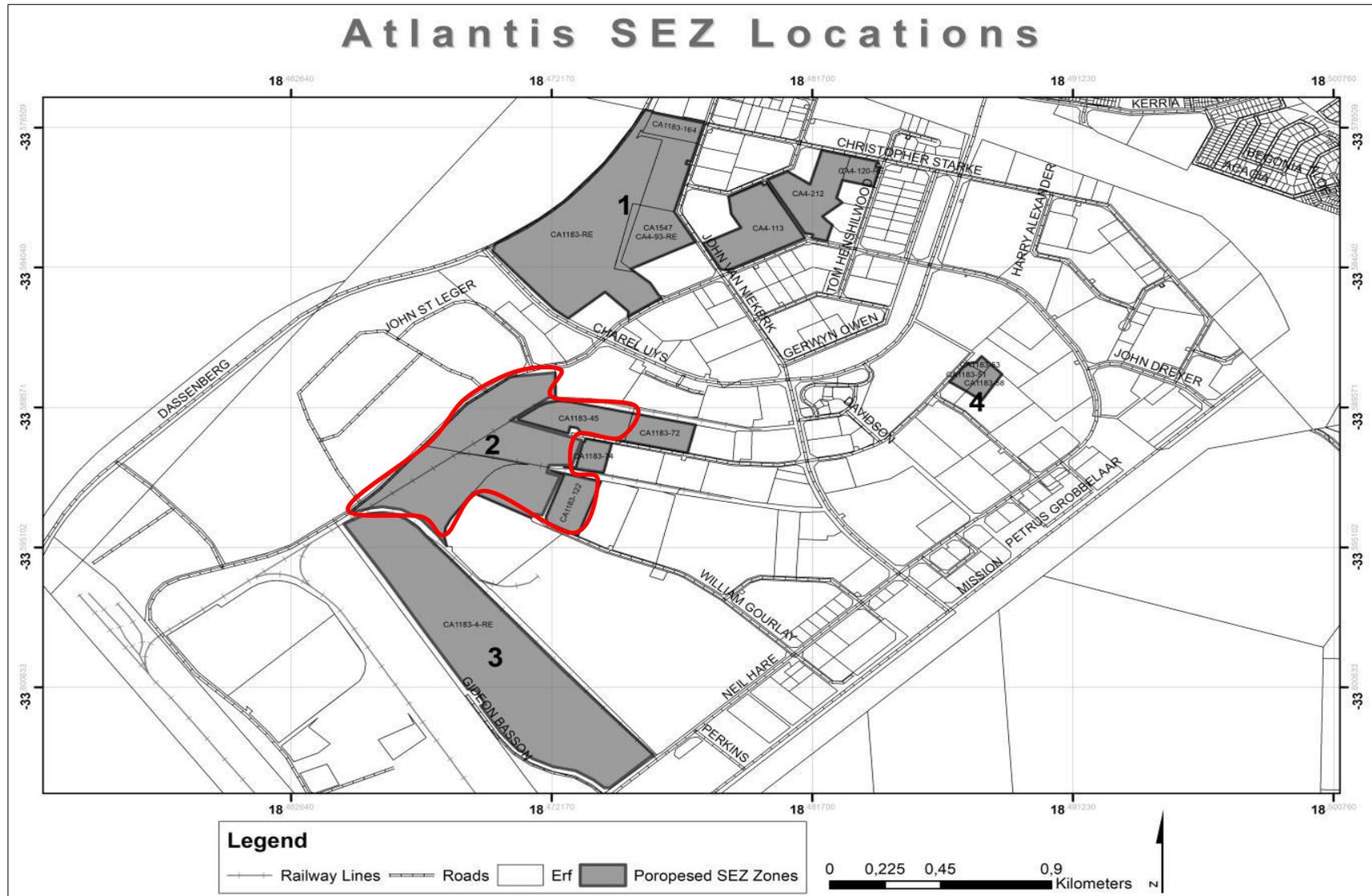


Figure 2.1: Zones in the Atlantis SEZ (proposed site being Zone 2 of the Atlantis SEZ – portions outlined in red)

2.3. EIA AND THE ENVELOPE APPROACH

In terms of Environmental Authorisation and the identification of listed activities in the EIA regulations, the project description will follow the “envelope approach”. The Rochdale Envelope Approach² will be applied to determine the preferred Development Envelope for the proposed facility. The Rochdale Envelope approach is named after two legal cases relating to a proposed business park in Rochdale in the United Kingdom. These cases considered applications for outline planning consent in the context of preparing an EIA. The goal of the Rochdale Envelope approach is to allow for an EIA to be undertaken, based on the ‘worst case scenario’, whereby the Competent Authority granting the EA will then decide whether, based on this ‘worst case scenario’, the environmental impacts are acceptable.

This approach is very useful since normally an EIA is undertaken prior to the technical assessment of the site which would consider the exact placement of, for example, the buildings and associated infrastructure. The main principle behind this approach is that, should the development fall within the parameters set within this “envelope”, as determined by the EIA Process, the placement of the different components could be determined at a later stage provided that the components fall within the parameters of the envelope. This approach therefore allows for flexibility to the developer during the detailed design phase in terms of engineering, design and construction parameters (as outlined by the GreenTech sub-sectors below which are being considered for this site).

The development envelope parameters in which this project will fall will be determined by the zoning of the site within the SEZ. The General Industry Subzone (GI1) zoning of the site permits to GreenTech industries identified through market segmentation and sizing. In making the land available specifically for the SEZ, the City has further limited use rights on the land in that only applicants who comply in terms of one or more of the following categories will qualify for evaluation, i.e., companies that:

- Have been awarded power purchase agreements.
- Are Supplying components to utility scale renewable energy installations.
- Manufacture/ supply energy efficient equipment.
- Manufacture/ supply green technology.
- Specialise in the construction and/ or management and/ or maintenance of renewable energy installations.
- Manufacture and/ or repair components for primarily green manufacturing industries.
- Are involved in research and experiments in respect of renewable energy.

It is acknowledged that a specific green technology activity may require further deviation from the applicable zoning regulations, for example in relation to building height, setbacks, floor area, or coverage. In these cases, departures from the provisions of the zoning scheme could be applied for. However, for the purpose of EA, it is understood that **if the facility falls within the parameters of the development envelope, as mentioned above, the exact building placement and layout can be determined at a later stage in the design phase.** Thus, the environmental impact assessment will take into considerations the parameters of a “worst-case scenario” as per the GI1 zoning by-laws above.

2.4. COMPONENTS OF A GREENTECH FACILITY

The site is zoned “General Industrial” and is located in the Atlantis Industrial Area. The proposal is for the use of the site for industrial purposes. The site is therefore within the Urban Edge of Atlantis and is in line with the principles of the Cape Town Spatial Development Framework. The proposal is therefore to utilise the proposed portions of land located in the Atlantis Industrial Area for its intended purposes - Industrial development. Furthermore, the CoCT intend to lease the land to company’s within the GreenTech sector, and therefore the

² Infrastructure Planning Commission (IPC), Using the ‘Rochdale Envelope’. February 2011

proposal is for the construction of manufacturing facilities to support the broader “Green Economy”. GreenTech covers a broad array of technologies used in the production and consumption of goods and services, and as such it would have been impractical to try and size the opportunity for the SEZ in every category of GreenTech. The existing potential market and investment opportunities analysis for the Atlantis SEZ was revised and analysed to identify further opportunities and sub-sectors for GreenTech in the SEZ. The list below highlights the more focused sub-sectors that may potentially be considered for the proposed Atlantis GreenTech Facility (**Note**: all GreenTech options listed below fall within the bounds of the listed activities as per the Application for Environmental Authorisation):

- a) **Renewable Energy Component Manufacturing:** Manufacturing of technologies for Solar PV, Wind and CSP, as well as solar water heaters and energy efficient lighting;
- b) **Energy:** energy storage, water and energy and electric vehicles (Note – not generation);
- c) **Waste and Recycling;**
- d) **Water Efficiency:** water smart metering, water efficient devices and eco-friendly packaging.

Therefore, a combination of Technological Alternatives will form part of the ‘green’ manufacturing hub in Atlantis. As mentioned above, it is not considered feasible to commit to a specific technological alternative, nor to design the layout of the facility at this stage of the project process as it would depend on the investors who are successful in terms of the bidding process to lease the land and the types of technology that will be manufactured, in accordance with the types of GreenTech alternatives mentioned above. However, the EIA process will consider the impacts of the GreenTech sub-sectors above using the Envelope Approach, so as to ensure **all impacts** relating to the technological options for GreenTech are considered.

In terms of likely scenarios for investment for Zone 2 of the SEZ, analysis done by Nova Economics (Pty) Ltd (December 2019) highlighted several prospects in the sectors mentioned above. The Western Cape is currently in the midst of a very severe drought with the dam’s region having experienced the lowest annual rainfall over the period 2015 to 2017 since 1933. This has resulted in increased water supply risks, water restrictions and will see the introduction of higher water tariffs and regulations (review of 2010 water bylaws) to promote the uptake of water-efficient technologies. It is expected that this will continue to drive the demand for a range of water efficient devices and storage solutions, some of which can be made competitively by local producers. The market analysis also suggested that potential to expand production of components for the utility-scale renewable energy plants in Atlantis has diminished significantly in the short-term (within next 5 years) relative to the 2014 scenarios, although prospects remain good in the medium-to-long term. Renewable components such as solar PV panels and wind turbine components were identified as ‘high potential’ and central to the development of the SEZ in the 2014 prefeasibility. Renewable energy component manufacturing is also likely to re-emerge as a key opportunity for the SEZ over the medium-to-long term – as large-scale procurement of utility-scale renewables is expected to recommence when the emerging surplus of power capacity begins to dwindle again.

Thus, the proposal will therefore entail the utilisation of the entire site for industrial development, as it is zoned. The buildings (coverage, height etc.) to be located on site will be in accordance with the existing zoning of the site and the location in which the site is situated i.e. ‘General Residential’ and the Atlantis Industrial Area. The CoCT’s building regulations and planning policies will be adhered to. Thus, in order for the purpose of the EIA process, an “Envelope Approach”³ will be adopted, allowing for all development within the specifications of the zoning of the site to be approved. These specifications are described in Table 2.3 below.

³ See description on the Rochdale Envelope Approach below under “Envelope Approach”

Table 2.3: Specifications for General Industrial sites (Atlantis SEZ Feasibility Report, Deloitte, 2014)

GENERAL INDUSTRY SUBZONE GI 1					
Purpose	The GI zone accommodates all forms of industry, except noxious trade and risk activity, in order to promote the manufacturing sector of the economy. Some allowance is made for non-industrial activities, but these should not compromise the general use of the area zoned for industry. It is accepted that the intensive nature of the industrial activity or the scale of the operation could generate some negative impact on adjacent properties.				
Primary uses	Industry, restaurant, service station, motor repair garage, funeral parlour, scrap yard, authority use, utility service, crematorium, rooftop base telecommunication station, freestanding base telecommunication station, transport use, multiple parking garage, agricultural industry, private road, open space.				
Additional use rights	<p>Specific conditions applicable to additional use rights</p> <table border="1"> <tr> <td>Factory shop</td> <td> <p>The occupant of an industry may operate a factory shop provided that:</p> <p>The total floor space devoted to the sale of goods shall not exceed 10% of the total floor space of all the buildings on the land unit.</p> <p>Any goods that are offered for sale but have not been manufactured on the property must be directly connected with the goods that are manufactured on the property.</p> </td> </tr> <tr> <td>Adult shop</td> <td> <p>An adult shop shall not be located within 100 m of an existing adult shop, adult entertainment or adult services premises.</p> <p>The street front and entrance shall be discreet and unobtrusive, and no pornographic, sexually explicit or erotic material shall be visible from outside the premises.</p> <p>Outdoor signage must comply with Council's Outdoor Advertising and Signage by-law.</p> <p>No form of public address or sound amplification shall be audible from outside the premises.</p> </td> </tr> </table>	Factory shop	<p>The occupant of an industry may operate a factory shop provided that:</p> <p>The total floor space devoted to the sale of goods shall not exceed 10% of the total floor space of all the buildings on the land unit.</p> <p>Any goods that are offered for sale but have not been manufactured on the property must be directly connected with the goods that are manufactured on the property.</p>	Adult shop	<p>An adult shop shall not be located within 100 m of an existing adult shop, adult entertainment or adult services premises.</p> <p>The street front and entrance shall be discreet and unobtrusive, and no pornographic, sexually explicit or erotic material shall be visible from outside the premises.</p> <p>Outdoor signage must comply with Council's Outdoor Advertising and Signage by-law.</p> <p>No form of public address or sound amplification shall be audible from outside the premises.</p>
Factory shop	<p>The occupant of an industry may operate a factory shop provided that:</p> <p>The total floor space devoted to the sale of goods shall not exceed 10% of the total floor space of all the buildings on the land unit.</p> <p>Any goods that are offered for sale but have not been manufactured on the property must be directly connected with the goods that are manufactured on the property.</p>				
Adult shop	<p>An adult shop shall not be located within 100 m of an existing adult shop, adult entertainment or adult services premises.</p> <p>The street front and entrance shall be discreet and unobtrusive, and no pornographic, sexually explicit or erotic material shall be visible from outside the premises.</p> <p>Outdoor signage must comply with Council's Outdoor Advertising and Signage by-law.</p> <p>No form of public address or sound amplification shall be audible from outside the premises.</p>				
Consent use	Abattoir, place of worship, institution, clinic, place of assembly, adult entertainment business, adult services, aqua-culture, informal trading, shop, office, sale of alcoholic beverages, place of entertainment, helicopter landing pad, wind turbine infrastructure and container site.				
Floor factor	1.5				
Coverage	75%				
Height	18m measured from base level to the top of the roof				
Street building lines	5m				
Common boundary building lines	3m				
Parking	Subject to the activity and designation of Public Transport Areas but for "standard" Industry: 2 bays per 100m ² GLA				

Note: The primary uses of General Industry Subzone GI 1 in the table above have been expanded since the inception of this excerpt and can also include the following: industry, restaurant, service station, motor repair garage, funeral parlour, scrap yard, authority use, utility service, crematorium, rooftop base telecommunication station, freestanding base telecommunication station, transport use, multiple parking garage, agricultural industry, private road, open space, additional use rights, veterinary practice and filming (Source: City of Cape Town Municipal Planning By-Law, 2015)

2.5. TYPICAL COMPONENTS OF A GREENTECH FACILITY

As mentioned above, the Envelope Approach is being proposed for this Environmental Impact Assessment process, as specific layouts and descriptions depend on the investment opportunities in the Atlantis SEZ. However, some key infrastructure and components of a typical GreenTech facility are described in this sub-section. Typically, a GreenTech manufacturing facility would consist of the following:

- Headquarters and Incubator Hub (flexible building design approach to allow for possible phased development and reconfiguration over time and a deep-space building footprint to accommodate a variety of internal subdivision arrangements. These structures will house offices and facilities for personnel and will not decrease aesthetic value in the surrounding area; ;
- A typical “warehouse” structure (industrial park);
- Storage facilities (combined with the workshop and provides accommodation for the maintenance personnel, plant equipment and spare parts);
- Existing access roads and works;
- Existing municipal service connections:
 - Potable Water: The site can be serviced from a 150 mm diameter pressurised pipe-line municipal pipeline provides for both domestic and fire-fighting requirements. Pressure within the pipeline is maintained between 7 to 9 bars, should water be required at higher pressure then booster pumps will have to be installed by the developer.
 - Foul Sewer: In the Atlantis district there are two parallel municipal gravity pipeline in the adjacent road network. Generally effluent is divided into two categories namely: (1) Domestic effluent generated from toilets, showers, hand basins and kitchen sinks, and (2). Industrial effluent which could include noxious effluents (bye produfrom manufacturing process).
 - Electrical: The City of Cape Town is the supplier of electricity to the Atlantis Industrial area. The security of electricity supply in Atlantis industrial has improved significantly in order to encourage development. The CoCT invested roughly R114 million on electricity supply upgrades for Atlantis. These upgrades added to the Eskom upgrades and have increased the power supply to the area by approximately 90 MVA, totalling 170 MVA supply in the area. It is also potentially proposed that **alternative renewable energy sources** will be considered, i.e. photovoltaic (PV) panels, to provide electricity directly into the building (depending on energy requirements).
 - Solid Waste: The removal of refuse (solid waste) is managed by the municipality, alternatively this service can be provided by private contractors, depending on developer’s needs.

Generally service connections (potable water and foul sewer) to the site are installed by the developer (i.e. the City of Cape Town), however they might not be in the position dedicated by the preferred placement of the building footprint. In this instance an application to the Municipality for new service connections would be necessary. Section 2.6 below describes the sustainable design principles that will be applies for the proposed development, which should **reduce the reliance on municipal services.**

2.6. SUSTAINABLE DESIGN PRINCIPLES

The proposed project will strive to not only supply GreenTech components to support the green economy but should itself be developed in a “green” and sustainable way. To achieve such an outcome, Sustainable Design Principles will be developed for the site. The following provides key areas identified where sustainable practices and principles will be targeted (Note: mitigation measures associated with the sub-sections below will also form part of the EMPr in the EIA Phase):

2.6.1. Building Design

- Industrial buildings to target objectives in terms of the Green Building Council of South Africa's Green Star Custom Industrial Tool.
- Office buildings to target objectives in terms of the Green Building Council of South Africa's Green Star Office Tool.
- Orient building to allow natural lighting to reduce the need for internal lighting.
- Consider linkages with adjacent buildings in terms of resource sharing.
- Incorporate shading to keep building cool and to reduce glare.
- Include designated area for waste/materials management.
- Design in a modular fashion to enable easy extensions with limited wasted resources during the construction phase (buildings to be flexible).
- Design to minimise the need for maintenance.

2.6.2. Water Conservation

- Capture rainwater for re-use in the building.
- Include dual reticulation plumbing to enable non-potable water to be used for toilet flushing, machine washing, irrigation, use in on-site processes, etc.
- Treat grey water for re-use (either irrigation or recirculate back into the building).
- Specify low flow aerators for taps (e.g. 1.3 litre/min).
- Urinals to be waterless.
- Consider on-site sewage treatment and re-use of treated wastewater.
- Consider using treated effluent for fire water from the Atlantis WWTW.
- Diversify water use to reduce reliance on Municipal potable supply.

2.6.3. Energy Efficiency

- Include insulation to reduce heating and cooling requirements.
- Encourage use of natural ventilation and natural lighting to reduce energy consumption for building temperature control.
- Use building materials / finishes that reflect heat in summer.
- Specify Energy Star equipment and appliances.
- Provide sub-meters to enable energy consumption to be monitored.

2.6.4. Waste and Recycling

- The EMP which will form part of the Environmental Impact Assessment (EIA) Report will address waste management practices to be implemented.
- During the design phase of the project, targets will be set for the re-use of construction waste materials thereby limiting waste sent to landfill (i.e. goal would be zero waste to landfill during construction and operational phases)

2.6.5. Stormwater Management

- Create a more natural system where stormwater and rainwater are captured onsite and used for activities to minimise the reliance on municipal supply.

- Incorporate the use of bioretention areas, etc. to allow excess stormwater / rainwater from roads, sidewalks and parking areas, to infiltrate whilst treating the water to improve water quality.
- No hardened channels for stormwater management.
- Enhance stormwater systems so that they become an amenity and promote biodiversity and open space for people to enjoy.
- Ensure stormwater systems tie into the existing Atlantis Aquifer Recharge Scheme to promote aquifer recharge.

As per a previously conducted feasibility study done for the SEZ, and ***example*** of a solar photovoltaic manufacturing facility can be seen in Figure 2.2 below.



Figure 2.2: *Example* of a typical layout structure of a GreenTech manufacturing facility (Atlantis SEZ Feasibility Report, Deloitte, 2014)

2.7. PROJECT DEVELOPMENT CYCLE

2.7.1. Construction

The construction phase will take place subsequent to the issuing of an Environmental Authorisation (EA). The construction phase for the proposed Atlantis GreenTech project is expected to extend over a period of between 15 and 38 months, assuming normal daylight working hours are in place (however the construction period is subject to the final requirements of Eskom).

The construction phase will involve the transportation of personnel, construction material and equipment to the site, and personnel away from the site. In terms of site establishment, laydown areas will be required at the outset of the construction phase, as well as dedicated access routes from the laydown areas to the working areas. Haul roads for construction traffic (for the delivery of concrete, road materials and other construction materials) will be required.

The laydown area will be located at the project site to minimise impacts. It is expected that the laydown area will be temporary in nature (for the duration of the construction phase) and will include the establishment of the construction site camp (including site offices and other temporary facilities for the appointed Contractors). The laydown area is expected to cover a maximum area of 1 ha (depending on the contracting strategy at the time).

All efforts will be made to ensure that all construction work will be undertaken in compliance with local, provincial and national legislation, local and international best practice, as well as the Environmental Management Programme (EMPr), which will be compiled during the EIA Phase and included in the EIA Report. During the construction phase, both skilled and unskilled temporary employment opportunities will be created. It is difficult to specify the actual number of employment opportunities that will be created at this stage; however approximately 200 personnel in project support industries will be utilized during the construction phase.

2.7.2. Operation and Maintenance

The anticipated date of the start of operations of the proposed Atlantis GreenTech project is dependent on several external factors (i.e. investors). The following activities will occur during the operational phase:

- Manufacturing of Green technologies;
- Maintenance of the GreenTech facility (routine, scheduled and unscheduled).

The projected operations are expected to provide several services and added economic spin offs (as highlighted in Chapter 1 of this Scoping Report). The operational phase of the project is expected to create skilled employment opportunities. However, other opportunities may arise for unskilled labour to be integrated to the ancillary activities. Approximately 280 temporary and 180 permanent employment opportunities will be created over the lifespan of the proposed facility.

2.7.3. Decommissioning

The main aim of decommissioning is to return the land to its original, pre-construction condition. Should the unlikely need for decommissioning arise (i.e. if the facility becomes outdated or the land needs to be used for other purposes), the decommissioning procedures will be undertaken in line with the EMPr and the site will be rehabilitated and returned to its pre-construction state.

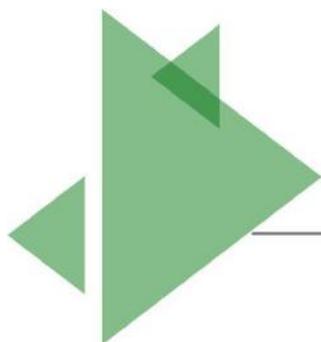
Scoping and Environmental Impact Assessment (EIA) for GreenTech in Zone 2
of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

DRAFT SCOPING REPORT



CHAPTER 3

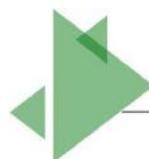
DESCRIPTION OF THE AFFECTED ENVIRONMENT



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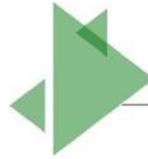
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3 DESCRIPTION OF THE AFFECTED ENVIRONMENT

This chapter of the Scoping Report provides an overview of the affected environment for the proposed Atlantis GreenTech project and the surrounding region. The receiving environment is understood to include biophysical, socio-economic and heritage aspects which could be affected by the proposed development or which in turn might impact on the proposed development. This information is provided to identify the potential issues and impacts of the proposed project on the environment. The information presented here has been sourced from:

- Scoping input from the specialists that form part of the project team;
- Review of information available on the South African National Biodiversity Institute (SANBI) Biodiversity Geographical Information System (BGIS) and Agricultural Geo-Referenced Information System (AGIS); and
- City of Cape Town Metropolitan Municipality IDPs and the Cape Town PSDF.
- Basic Assessment & correlating specialist studies, as well as the full Scoping & EIA conducted (by CSIR) for nearby sites in Atlantis (Portion 1 and Portion 4 of Cape Farm 1183) in 2012 and 2015/16 respectively.

It is important to note that this chapter intends to provide an overview and does not represent a detailed environmental study. Detailed studies focused on significant environmental aspects of this project will be provided during the EIA Phase¹.

3.1 BACKGROUND

The proposed project is situated on erf portion remainder of 277, 246, 254 and portion remainder of 171, is bordered by Neil Hare road to the South, Neil Hare road to the North, Gideon Basson to the West and Charel Uys on the East. The total portion property covers approximately 32.6 ha in area. As previously noted, the site is located approximately 43 km north of Cape Town, in the Koeberg and Blaauwberg Sub-Councils of the Cape Town Metropolitan Municipality. The co-ordinates of the corner points of the preferred project area are provided in Chapter 2 of this Scoping Report. Figure 3.1 provides a locality map of the proposed project area within a regional setting. The proposed GreenTech facility is far removed from major centers, roads and tourist attractions. It is located near the R307 which functions as a primary access route to Atlantis from Cape Town. The closest major road is the R27 which functions as a connector between Saldanha and Cape Town.

3.2 PRELIMINARY SENSITIVITY SCREENING

Figure 3.1 represents the regional setting of the proposed Atlantis GreenTech project in terms of the surrounding sensitive ecosystem features and sensitive geographical areas (as indicated in Listing Notice 2 and 3 of the 2014 EIA Regulations, as amended in 2017) in proximity to the site. Based on the preliminary sensitivity screening undertaken for the site (as well as existing information for the area), the proposed Atlantis GreenTech facility is situated within the Cape West Coast Biosphere reserve and approximately 8 km west of Camphill Conservation Area and 800 m from Witzands Aquifer Nature Reserve (located to the north and west). In terms of the City of Cape Town (CoCT) urban conservation areas, the proposed site is approximately 10.5 km north-west of Philadelphia. The proposed development of the Atlantis GreenTech facility may have a visual impact on surrounding protected areas. However, the landscape has already been altered by industrial infrastructure (e.g. Ankerlig power station), and therefore the proposed development is anticipated to have limited visual impacts on sensitive visual receptors. Cape Flats Dune Strandveld is listed as being Endangered, whilst the Atlantis Sand Fynbos is listed as being Critically Endangered (Fynbos Forum, 2016). The proposed facility is situated in the Cape Flats Dune Strandveld and immediately outside of the Atlantis Sand Fynbos vegetation type (east). The proposed facility is located in an area identified by the Biodiversity Network (BioNet) as *Other natural vegetation*, which means that activities in the area are negotiable, but low impact activities are preferable as the vegetation is still in a good condition and should be sustainably managed.

¹ Environmental Impact Assessment within the South African context exists of 2 distinct phases; namely, the Scoping Phase (of which this report is part), and the Environmental Impact Assessment Phase.

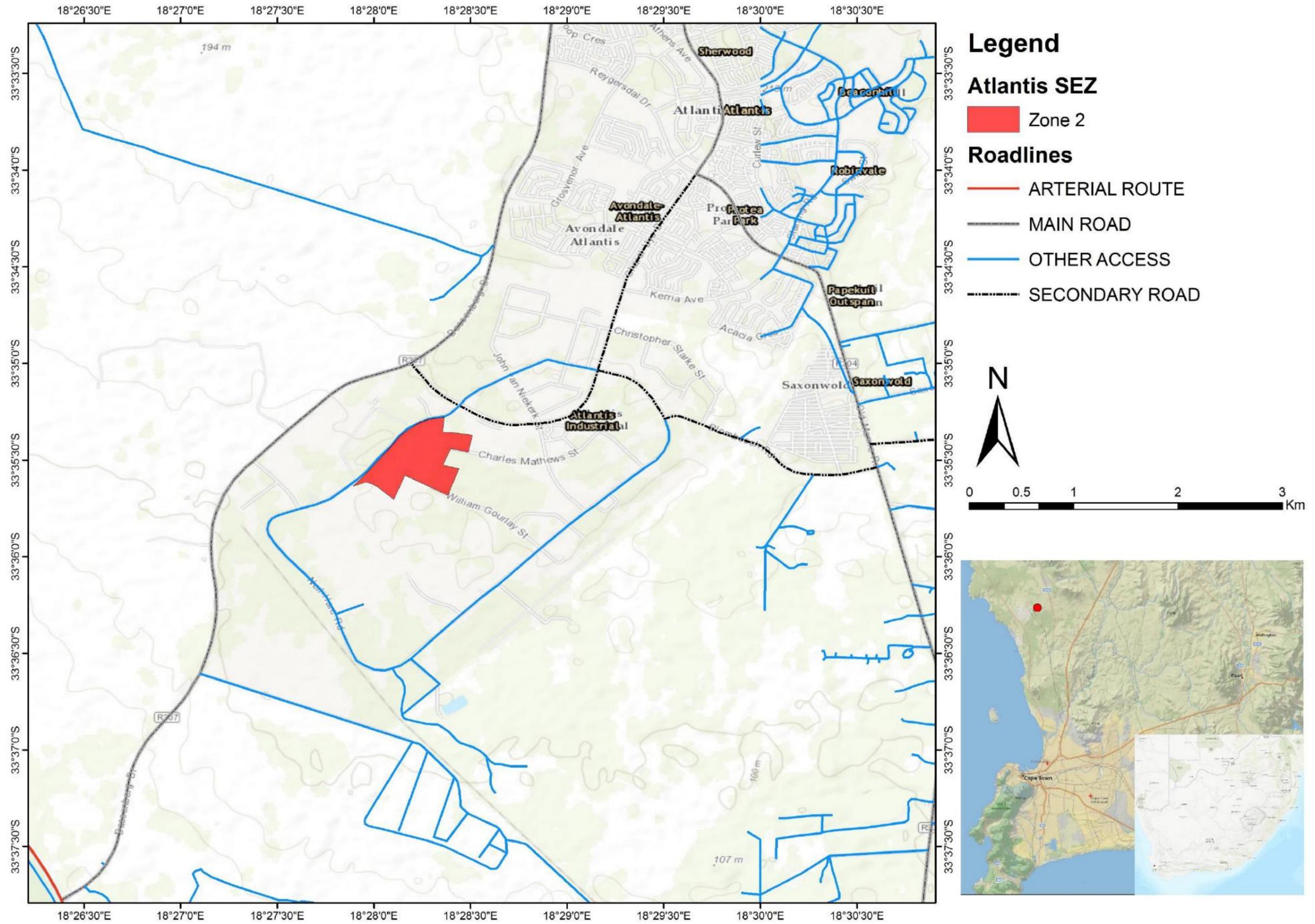


Figure 3.1: Regional Context of the Atlantis GreenTech site (i.e. Zone 2 of the Atlantis SEZ)

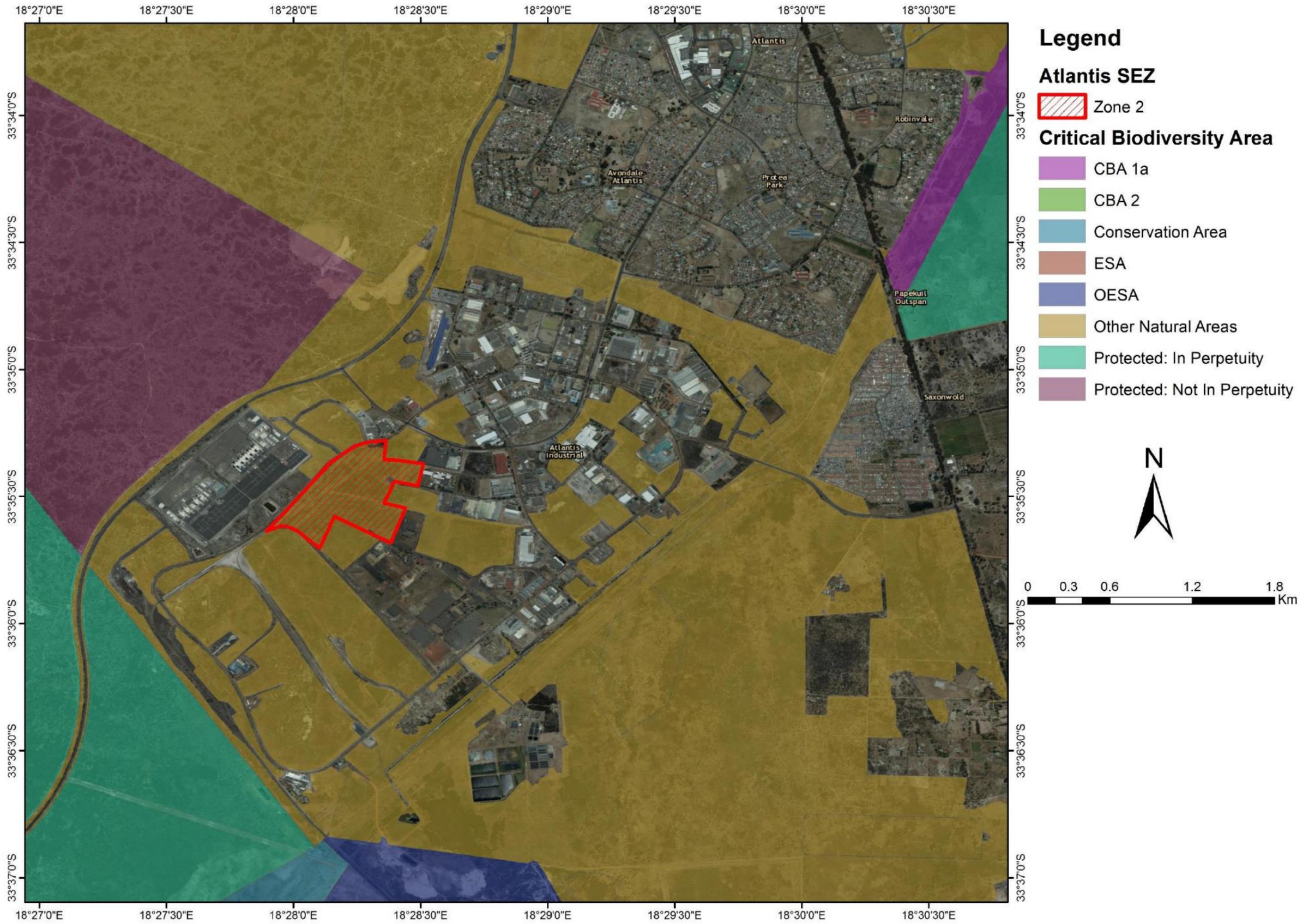


Figure 3.2: Composite map of potential sensitive ecological features in the area proposed for GreenTech Project (i.e. Zone 2 of the Atlantis SEZ)

3.3 BIOPHYSICAL ENVIRONMENT

3.3.1 Climatic Conditions

The mean annual rainfall of South Africa is shown in Figure 3.3 below. The climate of the Western Cape is semi-arid with a late summer-autumn rainfall regime. Average rainfall of the area varies from 50 mm to 400 mm per year. Evaporation levels within this province exceed the annual rainfall. Climate conditions are extreme (i.e. very cold in winter and extremely hot in summer).

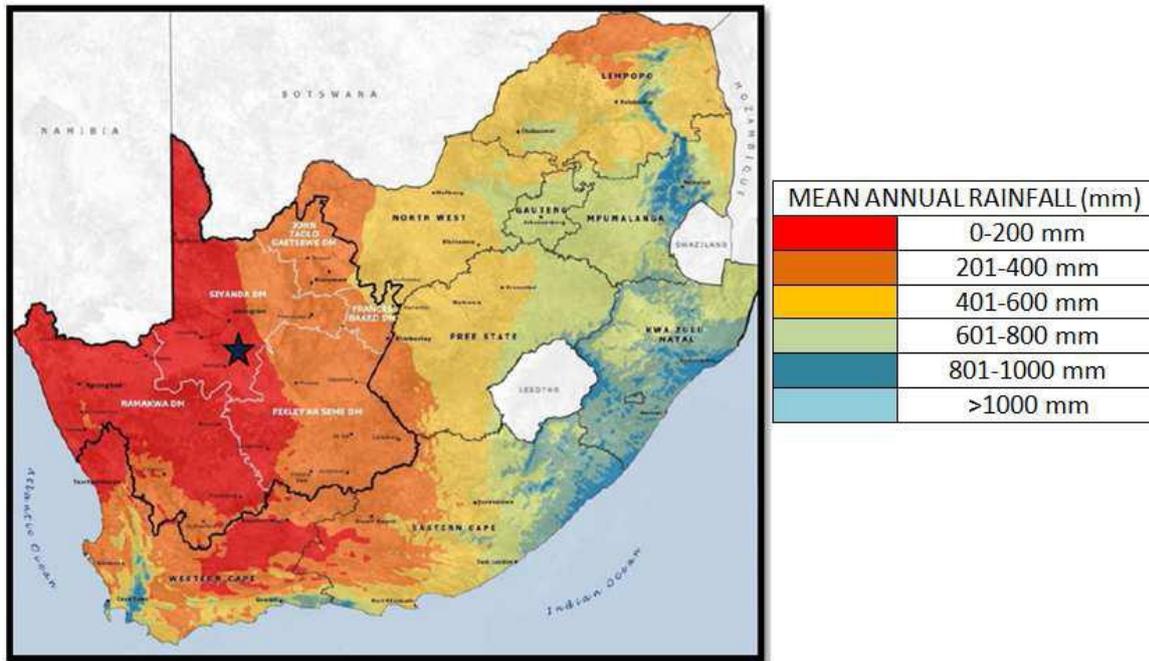


Figure 3.3: Mean Annual Rainfall Levels of South Africa (Source: Northern Cape PSD, 2012)

In terms of climatic conditions, rainfall and temperature are arguably two of the key parameters requiring consideration during this assessment. The Atlantis area is characterised by Mediterranean climate with the majority of rainfall received during the winter months (approximately 39 mm on average during June/July), and with corresponding low temperatures experienced during July (approximately 10 degree Celsius on average) and maximum temperatures in February (approximately 22 degrees Celsius on average) (Figure 3.4).

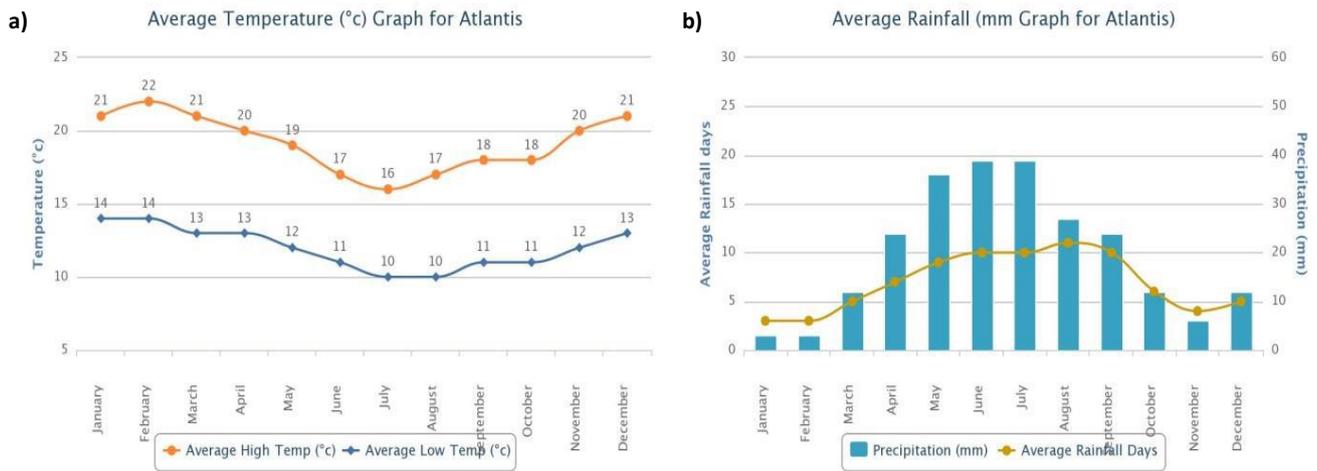


Figure 3.4: Long-term mean a) temperatures (°C); and b) mean precipitation (mm) for Atlantis, Western Cape (Worldweatheronline.com, 2015).

3.3.2 Geology

The geological formation of the CoCT is dominated by the Malmesbury Group which is composed of sedimentary rocks, mudstones and sandstones, the Cape Granite made up of metamorphic rocks containing feldspar, black mica and quartz, the Table Mountain Group composed of sedimentary rocks and sandstone, and the Sandveld Group. The Blaauwberg district is composed of the Malmesbury Group with overlaps of the Cape Granite deposits (CoCT Spatial Development Plan & Environmental Management Framework, 2011).

The Atlantis SEZ consists of low to moderate vegetated dunes, which are characteristic of the surrounding area. The dunes are of aeolian origin, underlain by fine- to medium- grained sand. These contain detrital carbonate (mainly finely broken sea shells) of the Witzand Formation (Figure 3.5). The sands associated with most of the sites in the SEZ are alkaline due to the high calcium content. Some parts of the SEZ contains aeolian deposits, however, the detrital carbonate (sea-shells) has been leached from the original dune sands and they are therefore most likely acidic.

3.3.3 Topography

The Blaauwberg district is characterised by plains and hills, with the plains extending from the Cape Peninsula to Atlantis. The coastal belt has relatively low lying hills of between 100m and 200m above sea level. The topography of the Atlantis area is relatively flat with minor slopes. The slope of the area is southward, and largely undeveloped, with the exception of partial agriculture (CoCT Spatial Development Plan & Environmental Management Framework, 2011). The vegetation of the area consists of the Cape Flats Dune Strandveld and the Atlantis Sand Fynbos (Mucina, *et al.*, 2005). The area comprises of vegetated dunes of low to moderate size, with the site however in isolation from the main dune system. Based on site inspections (as well as ecological impact assessments conducted on the neighboring site), most parts of the Greater SEZ have been transformed by alien invasive plants, with some remaining parts dominated by the small trees of the Cape Flats Dune Strandveld and the partially disturbed Atlantis Sand Fynbos vegetation (McDonald, 2012).

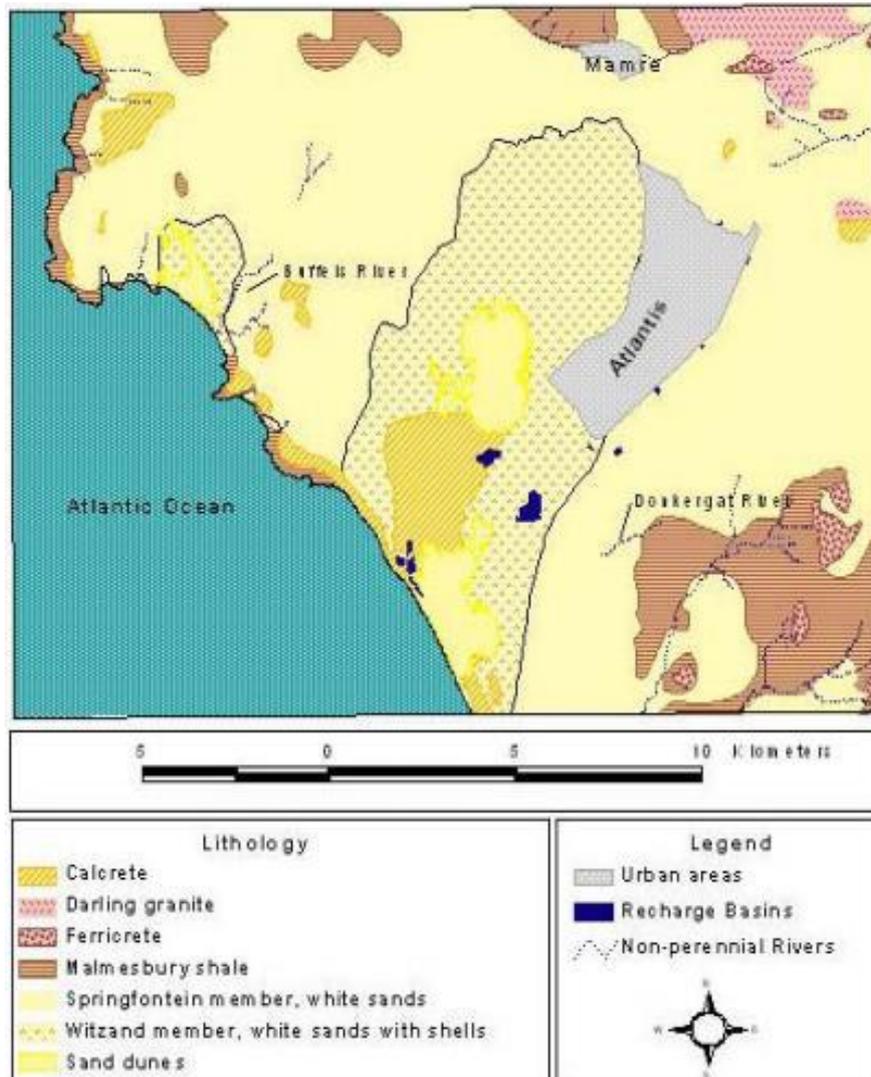


Figure 3.5: Geological features of the Atlantis Area

3.3.4 Agricultural Capability and Sensitivity

The limiting factor to agricultural expansion in the Atlantis area is water availability. While different soil types are suitable for differing crops cognisance must be taken of the need for appropriate crop selection, which can have a substantial influence on water requirements and the sustainability thereof. For example, the sandy soils of the Sandveld on the west coast are not suitable for most crops, but are highly suited to seed potato farming. However, the West Coast is a low rainfall area, and irrigation of these potato crops is heavily reliant on groundwater. These crops also rely heavily on pesticides and fertilisers, which can contaminate the runoff into the freshwater resources in the area.

The land capability of the proposed GreenTech facility and surrounds are moderately arable, whilst annual crops/planted pastures are located approximately south of the Site. Although the area is indicated as having a moderate potential productive farming, it is zoned for industrial land-uses and is not expected to be considered for agricultural activities. The Atlantis Industrial area lies within the Atlantis Coastal Plain, which is characterized by white sandy soils that are not suitable for agriculture, making the area undesirable for agricultural activities (Atlantis Foundries Draft EIA Report, 2015).

3.3.5 Soil Types and Soil Potential

As a result of chemical and mechanical weathering of the Malmesbury Group geological form, the derived soils towards the eastern and north-eastern boundary of the Blaauwberg district are rich in clay. The site is characterised by low to moderate aeolin origin dunes of fine to medium grained sand, containing detrital carbonate. Majority of the site's sands are alkaline and the southern portion of the site consisting of Aeolian deposits acidic sands. As previously stated, the sandy soils of the Sandveld on the west coast are not suitable for most crops, but are highly suited to seed potato farming. However, the West Coast is a low rainfall area, and irrigation of these potato crops is heavily reliant on groundwater.

3.3.6 Existing Groundwater Data

The study area falls within the Berg River Water Management Area (WMA) and extends over portions of four Quaternary Catchments, namely G10L, G21A, G21B and G21D. The central parts of the study area are poorly drained due to the flat-lying nature of the terrain and an extensive cover of unconsolidated Cenozoic sands which absorb most of the rainfall. The easterly and northerly-flowing Modder and Groën Rivers drain the northern part of the area. The southern boundary of the study area is formed by the Sout River which discharges into the Atlantic Ocean between Riebeeckstrand and Melkbosstrand. The southerly flowing Swart and Diep Rivers occur to the east of the study area. The hydrogeological environment in the Blaauwberg district is diverse as a result of the variety of the geological formations. The area hosts fractured aquifers, intergranular aquifers, and fractured and intergranular aquifers (CoCT Spatial Development Plan & Environmental Management Framework, 2011).

According to the Preliminary Assessment done for the Ankerlig Power Station (Woodford, 2007), the Atlantis Primary Aquifer System (APAS) forms part of an almost continuous coastal primary aquifer system that extends from Cape Town in the south to the Olifants River in the north (Bredenkamp and Vandoolaeghe, 1982). The Aquifer System has been subdivided into a number of groundwater units namely: f Silverstroom; f Witzand; f Brakkefontein; and Wesfleur. These units were defined according to the groundwater flow regime, as well as palaeo-channels and topographic 'highs' within the Malmesbury bedrock. Therefore groundwater can flow freely between the units in the APAS. Sediments of the Springfontein Member form the main transmissive zone of this Aquifer System. The Malmesbury rocks are generally regarded as forming the base of the APAS, although exploration drilling at the Koeberg Nuclear Power Station (Murray and Saaiman, 2000) and in the Langebaan Road Aquifer System has indicated that it is not uncommon to intersect substantial yields (>10 L/s) of groundwater in the Malmesbury bedrock where it is overlain by thick, saturated Cenozoic sands. At places along the coast there is evidence of groundwater emerging from fractures in the bedrock and flowing into the sea (Visser, 1972). It is also important to note that this development falls within the Atlantis Aquifer protection zone.

Table 3.1: Estimated Volumes of Groundwater stored in the Atlantis Primary Aquifer System
(Bredenkamp and Vandoolaeghe, 1982)

Groundwater Resource Unit	Area (km ²)	Volume Groundwater in Storage (x 10 ⁶ m ³)	
		Total	Abstractable
Silverstroom	52.6	71	50
Witzand	44.8	189	130
Wesfleur	36.5	79	55*
TOTAL	-	339	235

Source: Bredenkamp and Vandoolaeghe (1983)
 Note: The Matroosbaai GRU has been included in the Silverstroom Unit.
 The extend / boundary of the Witzand GRU towards Melkbosstrand is unknown and was estimated.
 * - boundary condition are unkown

3.3.7 Terrestrial Environment

Protected Areas

The proposed Atlantis GreenTech facility is situated within the Cape West Coast Biosphere reserve and approximately 8 km west of Camphill Conservation Area. The site is also approximately 1.1 km north-east of the White Sands Aquifer Nature Reserve, approximately, 3.16 km north-west of Klein Dassenberg Protected Area, approximately 5 km north-east of the Koeberg Nature Reserve and approximately 2.3 km north-east of three protected areas that are yet to be proclaimed. Furthermore, the site is approximately 9.3 km south-west of Burgherspost Wine Estate CapeNature stewardship site and the Pela Nature Reserve (section of the Riverlands Nature Reserve); as well as approximately 10.5 km west of Groenfontyn Nr 48 Voluntary Conservation Area, 15 km south-west of the Riverlands Nature Reserve (Figure 3.6). The proposed development of the Atlantis GreenTech facility may have a visual impact on surrounding protected areas. However, the landscape has already been altered by industrial infrastructure (e.g. Ankerlig power station), and therefore the proposed development is anticipated to have limited visual impacts on sensitive visual receptors.

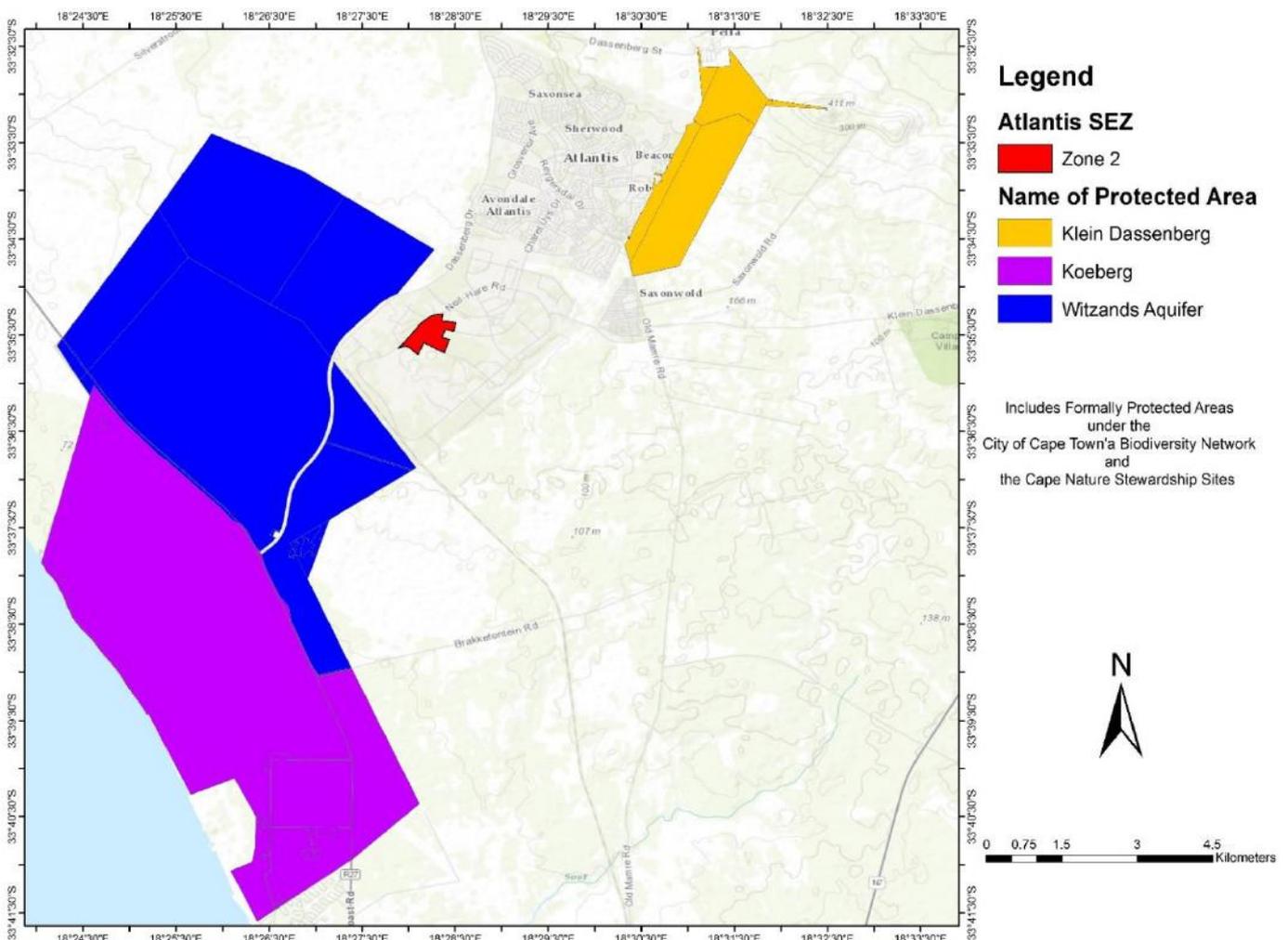


Figure 3.6: National Protected Areas within 15 km of the proposed Atlantis SEZ (Note: Klein Dassenberg is the protected area designated as a land banking mechanism as part of the incentive scheme – more information in Appendix F).

3.3.8 Threatened ecosystems (remaining extent)

A national list of threatened ecosystems is provided for in The National Environmental Management: Biodiversity Act (NEMBA) (No. 10 of 2004) (South Africa, 2004). There are three classes of threatened ecosystems namely: i) Critically endangered (CR) vegetation types which have less than 25 % of its original cover remaining, have undergone severe degradation of ecological structure, function or composition due to human activities, and are subject to an extremely high risk of irreversible transformation; ii) Endangered (EN) vegetation types have lost more than 60% of its original extent and have undergone degradation of ecological structure, function, or composition due to human activities, although they are not critically endangered ecosystems; and iii) Vulnerable (VU) vegetation types that have lost approximately 50 % of its original extent and are at a high risk of undergoing significant degradation of ecological structure, function or composition due to human activities, although they are not critically endangered ecosystems or endangered ecosystems.

Cape Flats Dune Strandveld is listed as being Endangered, whilst the Atlantis Sand Fynbos is listed as being Critically Endangered (South Africa, 2004). The proposed Atlantis GreenTech facility is partly situated in the Cape Flats Dune Strandveld vegetation types (Figure 3.7).

3.3.9 Atlantis Industrial Incentives Scheme (biodiversity loss)

The proposed GreenTech Project falls within the urban edge of the Atlantis Industrial Area and will account for the loss of 32.6 hectares of Endangered Cape Flats Dune Strandveld. The proposed development area is highlighted on the City of Cape Town: Biodiversity Network Map (2018) as "Other Natural Area". A biodiversity off-set in accordance with the **Land Bank of the Atlantis Industrial incentive Scheme** is thus being proposed to the Competent Authority. As such, it is proposed that an offset ratio of 1:1 is applied in order to mitigate for the loss of this significant area of Cape Flats Dune Strandveld. In addition to the proposed utilization of the Atlantis industrial incentive Scheme at a ratio of 1:1, certain conditions will form part of the EMPr in the EIA phase, as required.

Refer to Appendix F: "Other Information", for a full description of the Atlantis Industrial Incentives scheme and how it related to biodiversity loss in this context.

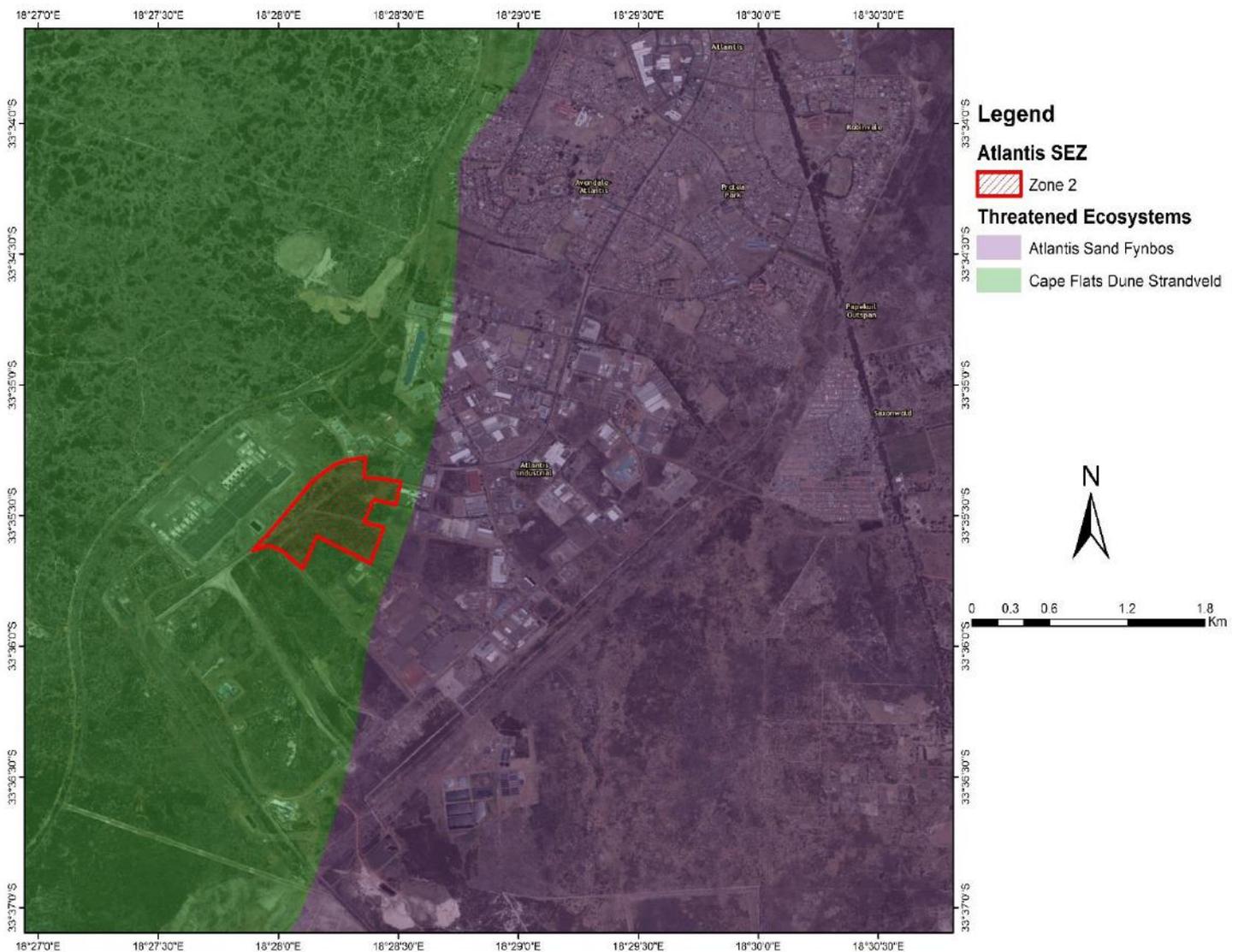


Figure 3.7: Threatened ecosystems in the area proposed for the GreenTech facility

3.3.9.1 Conservation planning and aquatic systems

The CoCT Biodiversity Network (BioNet) employed a systematic biodiversity planning approach to prioritise remnants of indigenous vegetation based on factors such as habitat connectivity and condition, as well as the distribution of threatened flora (Holmes *et al.*, 2012). The CoCT BioNet spatial information includes Protected Areas, Critical Biodiversity Areas (CBAs), and Ecological Support Areas (ESAs). The protected areas are divided into i) conservation areas that have not yet been proclaimed, ii) protected areas proclaimed in perpetuity, and iii) protected areas proclaimed for a limited period. The BioNet also includes levels of CBAs and ESAs such as areas critical for landscape connectivity, irreplaceable core flora sites, and natural / transformed ecosystems of conservation significance.

The proposed Atlantis SEZ is located in an area identified by the BioNet as **Other natural vegetation**, which entails that the activities in the area is negotiable, but low-medium impact activities are preferable as the

vegetation in some parts of the site is still in a good condition and should be sustainably managed (refer to Table).

Table 3.2: Description, significance and permissible actions for the Critical Biodiversity Areas as defined by the CoCT BioNet (adapted from Holmes *et al*, 2012).

BioNet CBA category	Description	Significance of habitat	Objective	Action	Compatible action
Other natural vegetation ²	Natural vegetation in endangered, vulnerable and least concern in good or restorable condition.	Local significance. Will result in impaired ability to meet targets, given that higher categories will not always be achievable.	Sustainable management within general rural land-use principles.	Negotiable. Low priority, no urgency. Invasive alien control.	Until BioNet is secured elsewhere, these areas may become important if required as biodiversity offset sites. Higher impact activities could be considered on degraded portions. Vegetation in good condition should be subject to low impact activities only.

3.3.10 Heritage Profile

3.3.10.1 Historical Background

The proposed development site is located on a portion of the original farm Brakkefontein. During the Verenigde Oosindichse Compangie (VOC) period, this farm occupied a strategic position in the *Slagtersveld* - the area around the outposts Ganze Kraal and Groene Kloof, largely used for grazing cattle, for slaughter, and for sale to passing ships. The farm continued to be occupied and was farmed by successive owners until 1855. A desktop heritage impact assessment will be included in the EIA Phase.

3.3.10.2 Archaeology

The terrain is largely flat and there are a number of dune fields. Where agriculture is not taking place, alien plant species have taken over. Previous archaeological surveys have described the poor visibility due to dense ground cover of alien vegetation as a limiting factor in surveying the site. A large number of Heritage and Archaeological Impact Assessments have been conducted in this area, including a survey by Hart *et al*. (2007). Hart *et al* reported that no significant archaeological material was recovered. A Heritage desktop will be conducted in EIA phase.

3.3.10.3 Palaeontology

The Palaeontological report of the neighbouring site suggested that peaty deposits occur in deeper sediments in the Atlantis SEZ. Traces of Pleistocene age terrestrial fossils have been located in sediments along the west bank of the Diep River entrance to Rietvlei and in sediments underlying Rietvlei. Early Pliocene marine mammal remains (whale bone) have been recovered from the Potsdam Sewerage pumping station (Graham Avery pers.

² The area proposed for the Atlantis SEZ is identified by the BioNet as this CBA category *Other natural vegetation*

observation), on Milnerton Beach at the Diep River estuary and Ysterplaats. During construction of the Koeberg Nuclear Power Station, Early Pliocene sediments yielded marine mammals, mainly whales. Further North, Middle Pleistocene terrestrial fossils and Middle Stone Age stone artefacts occur at Bokbaai. 20 km inland of Langebaan (Klein, *et al.* 2007), has yielded important Middle Pleistocene animal fossils (700 ka to 400 ka) and the earliest human remains (archaic *Homo sapiens*) found so far in the Western Cape. Late Pleistocene animal fossil occurrences occur along the coast from Melkbosstrand to Ysterfontein (Graham Avery pers. obs.) and at Elandsfontein. It is clear that the area is of palaeontological important and thus will be addressed as part of the EIA phase in a palaeontological impact assessment.

3.3.11 Socio-Economic Environment

Atlantis SEZ is located 7 km inland on the Cape West Coast. Important landmarks in the greater area are the Ankerlig Power Station, Koeberg Nuclear Power Station (approximately 9 km south-west of the site) and the small village of Mamre (approximately 4 km north of the site). The Atlantis Industrial was established as a recognized “growth-point” in the mid- 1970’s and was established with infrastructure and services which could facilitate growth in the future. The Industrial area includes an already established set of services such as tarred road network, stormwater, sewer, street lighting and water supply services. The site is zoned **General-Industrial** and the area surrounding the proposed facility is visually dominated by industrial stacks, buildings and transmission lines.

- Demographic Profile

In 2011 the population of 2011 Census suburb Atlantis was 67 491 and the number of households was 15 564. The average household size was 4.34 and Afrikaans is the most common spoken language in Atlantis (87%). As seen in Table 3.3 below, Gender distribution is relatively equal across the study area, with slightly more females than males. The age distribution, shown in Figure 3.8, is slightly younger than the average for the City of Cape Town, with a larger percentage aged under 17 years.

Table 3.3: Demographic Profile of the Atlantis Area (City of Cape Town Suburbs Census, 2011)

Atlantis Population	Male		Female		Total	
	Num	%	Num	%	Num	%
Black African	4 626	6.9%	4 087	6.1%	8 713	12.9%
Coloured	27 536	40.8%	29 835	44.2%	57 371	85.0%
Asian	144	0.2%	99	0.1%	243	0.4%
White	49	0.1%	51	0.1%	100	0.1%
Other	672	1.0%	391	0.6%	1 063	1.6%
Total	33 027	48.9%	34 463	51.1%	67 490	100.0%

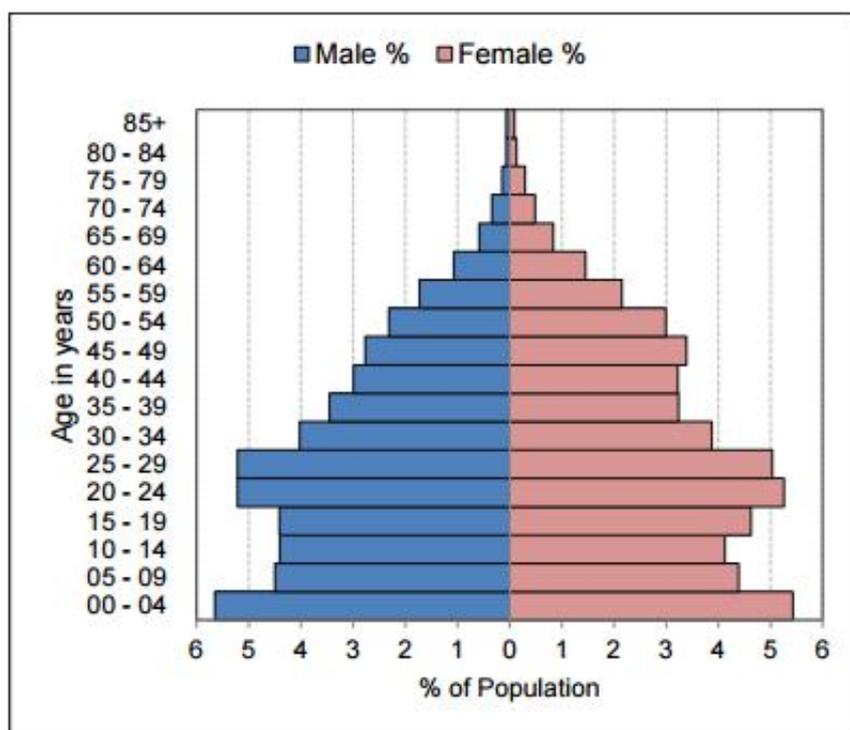


Figure 3.8: Age profile of the Atlantis Area (City of Cape Town Suburbs Census, 2011)

The education profile of Atlantis, as depicted in Table 3.4, shows that approximately 29% of the Atlantis residents aged 20+ had completed Matric in 2011, and less than 4% had attained any further levels of education. The percentage with “no schooling” was slightly lower than that of Cape Town as a whole at 2%. As a matter of contrast, the nearby town of Melkbosstrand had less than 2% with no education, over three quarters of the population had completed matric and just under a third had attained some level of tertiary education.

Table 3.4: Education Profile of the Atlantis Area (City of Cape Town Suburbs Census, 2011)

Atlantis Adult Education (for all aged 20+)	Black African		Coloured		Asian		White		Other		Total	
	Num	%	Num	%	Num	%	Num	%	Num	%	Num	%
No schooling	102	1.8%	681	1.9%	3	1.9%	0	0.0%	36	4.6%	822	2.0%
Some primary	621	10.7%	3 990	11.3%	15	9.4%	6	8.0%	63	8.0%	4 695	11.2%
Completed primary	303	5.2%	2 454	7.0%	9	5.7%	0	0.0%	18	2.3%	2 784	6.6%
Some secondary	2 874	49.6%	16 926	48.0%	57	35.8%	36	48.0%	219	28.0%	20 112	47.8%
Grade 12	1 728	29.8%	10 059	28.5%	60	37.7%	27	36.0%	345	44.1%	12 219	29.1%
Higher	156	2.7%	1 071	3.0%	9	5.7%	6	8.0%	78	10.0%	1 320	3.1%
Other	9	0.2%	60	0.2%	6	3.8%	0	0.0%	24	3.1%	99	0.2%
Total	5 793	100.0%	35 241	100.0%	159	100.0%	75	100.0%	783	100.0%	42 051	100.0%

- **Employment and Income Profile**

The economically active population (i.e the labour force) of Atlantis comprises approximately 60% of the population, as seen in Table 3.5. 26% of Atlantis residents are unemployed which is slightly higher than the average for Cape Town as a whole. Of the economically active residents of Atlantis, approximately 12% commute to jobs outside Atlantis. The remainder is employed by local industries, and small-to-medium and micro-enterprises (SMME's). Furthermore, a significant number of jobs in Atlantis (approximately 3000) are held by outsiders who commute to the area, of which the majority fall into the educational and other professional occupations. In terms of monthly household income, over half of the households in Atlantis earn less than R6 400 per month (Table 3.6).

Table 3.5: Employment Profile of the Atlantis Area (City of Cape Town Suburbs Census, 2011)

Atlantis Labour Force Indicators	Black African	Coloured	Asian	White	Other	Total
Population aged 15 to 64 years	6 366	38 769	168	75	819	46 197
Labour Force	4 467	22 641	120	51	618	27 897
Employed	3 117	16 734	93	42	495	20 481
Unemployed	1 350	5 907	27	9	123	7 416
Not Economically Active	1 899	16 128	48	24	201	18 300
Discouraged Work-seekers	429	2 091	6	0	27	2 553
Other not economically active	1 470	14 037	42	24	174	15 747
Rates %						
Unemployment rate	30.22%	26.09%	22.50%	17.65%	19.90%	26.58%
Labour absorption rate	48.96%	43.16%	55.36%	56.00%	60.44%	44.33%
Labour Force participation rate	70.17%	58.40%	71.43%	68.00%	75.46%	60.39%

Table 3.6: Household Income Profile of the Atlantis Area (City of Cape Town Suburbs Census, 2011)

Atlantis Monthly Household Income	Black African		Coloured		Asian		White		Other		Total	
	Num	%	Num	%	Num	%	Num	%	Num	%	Num	%
No income	747	22.7%	1 164	9.7%	9	17.6%	3	12.5%	36	16.0%	1 959	12.6%
R 1 - R 1 600	933	28.4%	1 758	14.7%	12	23.5%	3	12.5%	39	17.3%	2 745	17.6%
R 1 601 - R 3 200	825	25.1%	2 268	18.9%	3	5.9%	0	0.0%	48	21.3%	3 144	20.2%
R 3 201 - R 6 400	465	14.2%	2 838	23.7%	9	17.6%	6	25.0%	51	22.7%	3 369	21.7%
R 6 401 - R 12 800	198	6.0%	2 316	19.3%	15	29.4%	0	0.0%	30	13.3%	2 559	16.5%
R 12 801 - R 25 600	72	2.2%	1 164	9.7%	0	0.0%	9	37.5%	15	6.7%	1 260	8.1%
R 25 601 - R 51 200	33	1.0%	375	3.1%	3	5.9%	3	12.5%	6	2.7%	420	2.7%
R 51 201 - R 102 400	6	0.2%	39	0.3%	0	0.0%	0	0.0%	0	0.0%	45	0.3%
R 102 401 or more	6	0.2%	48	0.4%	0	0.0%	0	0.0%	0	0.0%	54	0.3%
Unspecified	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3 285	100.0%	11 970	100.0%	51	100.0%	24	100.0%	225	100.0%	15 555	100.0%

The economy of the Atlantis Area is dominated by industry and agriculture and contributes greatly to the economy of the Western Cape. Atlantis offers significant potential for economic development, and the City of Cape Town Metropolitan Municipality IDP (2004) identified Atlantis as one of the focal areas for residential upgrading. The Atlantis Industrial area is ideal and unique in its suitability and potential to contribute to industrial and economic development, specifically in terms of South Africa’s power mix. It has been noted that there are no major tourist destinations in close proximity to the site (Figure 3.9 below), which adds to the suitability of this site for the proposed GreenTech facility. Due to the zoning of this area as a Special Economic Zone, earmarked for industrial development, the CoCT IDP indicates that industrial development is one of the most important economic sectors in the Western Cape, specifically in Atlantis, due to its locality and existing infrastructure.

3.3.12 Proximity to the Koeberg Nuclear Power Station's Urgent Protection Zone (UPZ)

The site is situated between the 5- 16 km Urgent Protective Action Planning Zone (UPZ) boundary of the Koeberg Nuclear Power Station (KNPS). Figure 3.9 indicates the location of the site in relation to the Koeberg UPZ.

It is difficult to estimate the exact number of people to be employed on a temporary and permanent basis as well as the amount sourced locally or non-locally, as this may only be finalized in the development phase (and may fluctuate).³ However, it is important to provide a high-level assessment and anticipation of the population increase to the UPZ under the circumstance of a nuclear emergency. Thus, this increase needs to be tested against the KNPS Traffic Evacuation Model (TEM), as seen in Table 3.7 below.

Table 3.7: Anticipated population increase affecting the Koeberg Nuclear Power Station’s TEM

Proposed Atlantis GreenTech facility’s population increase for the Koeberg TEM					
PLEASE SPECIFY THE TYPE OF LAND USE:	SG CODE OR X,Y - COORDINATES	(GLA m ²) / Nr OF DWELLING UNITS / HOUSEHOLDS	INCOME GROUP (LOW/MIDDLE/HIGH FOR TYPE OF LAND USE)	POP INCREASE FROM INSIDE UPZ (RESIDENTS, WORKERS, OTHER OCCUPENTS)	POP INCREASE FROM OUTSIDE UPZ (RESIDENTS, WORKERS, OTHER OCCUPENTS)
General Industrial (GI)	SG Code: C0160000000118300004 C0160000000118300000 C0160000000118300008 C0160000000118300074	GreenTech facility i.e. warehouse-type structure (also consisting of an office for personnel)	Skilled personnel working on site will be predominaely from a high income group, where as the unskilled personnel from low-middle income groups.	~200 (Staff, skilled and support labour, construction and/or operation)	~20 (Specialist shutdown and outage personnel to be mobilised into the area for short periods)

³ This table will be updated in the development phase when the size of the project as well as the number of personnel needed is finalized by the Applicant.

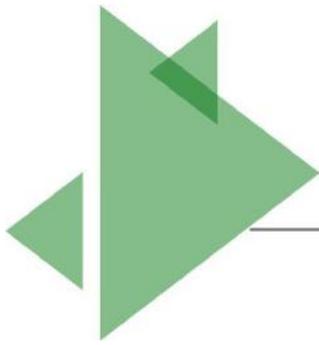
Scoping and Environmental Impact Assessment (EIA) for GreenTech in Zone 2
of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

DRAFT SCOPING REPORT



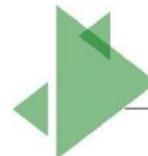
CHAPTER 4

APPROACH TO EIA PROCESS AND PUBLIC PARTICIPATION



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4 APPROACH

This chapter presents the EIA Process to be conducted for the proposed development and gives particular attention to the legal context and guidelines that apply to this EIA, the steps in the Scoping and Public Participation component of the EIA (in accordance with Regulations 41, 42, 43 and 44 of GN R326), and the schedule for the EIA Process.

4.1 LEGAL CONTEXT FOR THIS EIA

Section 24(1) of the NEMA states:

- *"In order to give effect to the general objectives of integrated environmental management laid down in this Chapter, the potential impact on the environment of listed activities must be considered, investigated, assessed and reported to the competent authority charged by this Act with granting the relevant environmental authorization."*

The reference to "listed activities" in Section 24 of the NEMA relates to the regulations promulgated in GN R327, R326, R325 and R324 in Government Gazette 40772, dated 7 April 2017. The relevant Government Notices published in terms of the NEMA collectively comprise the NEMA EIA Regulations listed activities that require either a Basic Assessment, or Scoping and EIA (that is a "full EIA") be conducted. As noted in Chapter 1 of this Scoping Report, the proposed project requires a full EIA, as it particularly includes, *inter alia*, the inclusion of , the inclusion of Activity 2 listed in GN R325 (Listing Notice 2):

"15. The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for- (i) the undertaking of a linear activity; (ii) maintenance purposes undertaken in accordance with a maintenance management plan."

All the listed activities potentially forming part of this proposed development and therefore requiring Environmental Authorisation (EA) were included in the Notice of Intent to Develop (NID) as part of the pre-application process and will form part of the Application Form for EA that has been prepared and submitted to the DEA&DP in conjunction with this version (second iteration) of the Draft Scoping Report. The listed activities potentially triggered by the proposed project are indicated in Table 4.1.

Table 4.1: Listed Activities in GN R327, R325 and R324 that potentially form part of the proposed Atlantis GreenTech EIA

Activity No.	Description as per the Regulations	Description as per the project specifics
GNR 327		
47	The expansion of facilities or infrastructure for the transmission and distribution of electricity where the expanded capacity will exceed 275 kilovolts and the development footprint will increase.	This project will entail the upgrading of the electrical infrastructure to service the facility.

Activity No.	Description as per the Regulations	Description as per the project specifics
GNR 325		
15	The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for— (i) the undertaking of a linear activity; or (ii) Maintenance purposes undertaken in accordance with a maintenance management plan.	This project entails the clearance of approximately 33 ha of indigenous vegetation for the development of a GreenTech manufacturing facility.
GNR 324		
12	The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. i. Western Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans.	This project entails the clearance of approximately 33 ha of indigenous vegetation for the development of a GreenTech manufacturing facility. A preliminary screening of the vegetation types for Zone 2 in the Atlantis SEZ indicated that the land parcels comprising this Zone consist of the Endangered Cape Flats Dune Strandveld.

Notes regarding the identification of potential listed activities:

- It should be noted that a precautionary approach was followed when identifying listed activities (for inclusion in the NID and Application for EA and to be assessed as part of the Scoping and EIA Process), i.e. if the activity potentially forms part of the project, it is listed. However, the final project description will be shaped by the findings of the EIA Process and certain activities may be added or removed from the project proposal. The DEA&DP and I&APs will be informed in writing of such amendments accordingly.
- Although internal roads are being constructed, **Activity 24 (ii) in GNR 327** relating to the construction of roads is not being applied for as the property falls **within the urban edge.**
- Based on the preliminary sensitivity screening undertaken for the site, the proposed project area does fall within a threatened ecosystem. A national list of threatened ecosystems is provided for in The National Environmental Management: Biodiversity Act (NEMBA) (No. 10 of 2004) (South Africa, 2004). There are three classes of threatened ecosystems namely: i) Critically endangered (CR) vegetation types which have less than 25 % of its original cover remaining, have undergone severe degradation of ecological structure, function or composition due to human activities, and are subject to an extremely high risk of irreversible transformation; ii) Endangered (EN) vegetation types have lost more than 60% of its original extent and have undergone degradation of ecological structure, function, or composition due to human activities,

although they are not critically endangered ecosystems; and iii) Vulnerable (VU) vegetation types that have lost approximately 50 % of its original extent and are at a high risk of undergoing significant degradation of ecological structure, function or composition due to human activities, although they are not critically endangered ecosystems or endangered ecosystems.

The proposed Site (Zone 2 of the Atlantis SEZ) is situated in the Cape Flats Dune Strandveld vegetation type, which is classified as an **Endangered ecosystem** (Fynbos Forum, 2016). The proposed site is also situated immediately West of the Atlantis Sand Fynbos vegetation type, a Critically Endangered ecosystem (Fynbos Forum, 2016), (Figure 4.1 below):

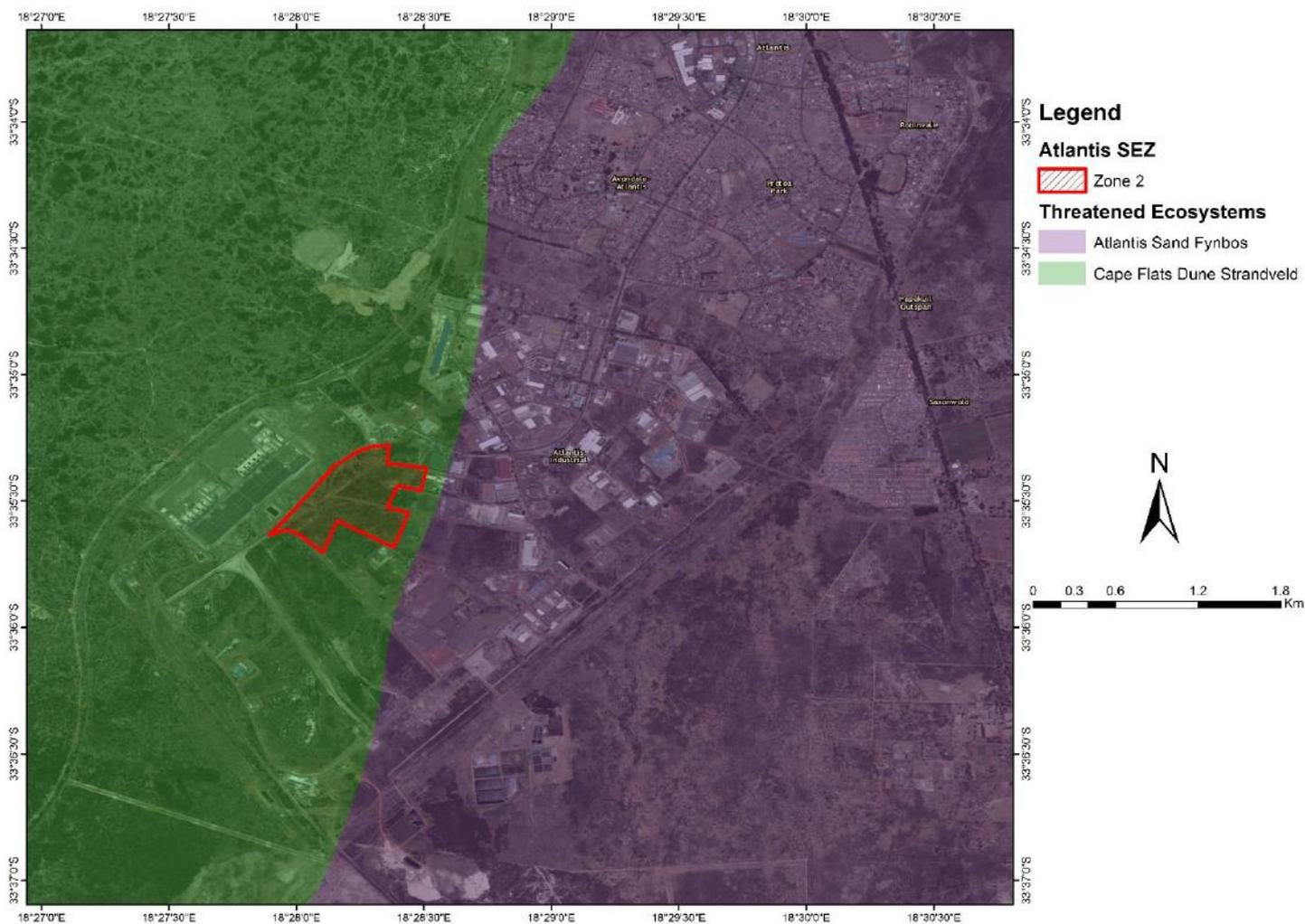


Figure 4.1: Threatened ecosystems in the area proposed for the Atlantis GreenTech site.

Please refer to **Appendix F** for information regarding the **Atlantis Industrial Incentives Scheme** as it relates to biodiversity offsetting in this context.

4.2 LEGISLATION AND GUIDELINES PERTINENT TO THIS EIA

The scope and content of this Scoping Report has been informed by the following legislation, guidelines and information series documents:

4.2.1 National Legislation

The Constitution of the Republic of South Africa (Act 108 of 1996)

The Constitution, which is the supreme law of the Republic of South Africa, provides the legal framework for legislation regulating environmental management in general, against the backdrop of the fundamental human rights. Section 24 of the Constitution states that:

- “Everyone has the right:
 - to an environment that is not harmful to their health or well-being; and
 - to have the environment protected, for the benefit of present and future generations through reasonable legislative and other measures that –
 - prevent pollution and ecological degradation;
 - promote conservation; and
 - secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.”

Section 24 of the Bill of Rights therefore guarantees the people of South Africa the right to an environment that is not detrimental to human health or well-being, and specifically imposes a duty on the State to promulgate legislation and take other steps that ensure that the right is upheld and that, among other things, ecological degradation and pollution are prevented.

In support of the above rights, the environmental management objectives of proposed project is to protect ecologically sensitive areas and support sustainable development and the use of natural resources, whilst promoting justifiable socio-economic development in the towns nearest to the project site.

NEMA and EIA Regulations published under Chapter 5 of the NEMA on 8 December 2014, as amended on 7 April 2017 (GN R327, GN R326, GN R325 and GN R324)

The NEMA sets out a number of principles (Chapter 1, Section 2) to give guidance to developers, private land owners, members of public and authorities. The proclamation of the NEMA gives expression to an overarching environmental law. Various mechanisms, such as cooperative environmental governance, compliance and non-compliance, enforcement, and regulating government and business impacts on the environment, underpin NEMA. NEMA, as the primary environmental legislation, is complemented by a number of sectoral laws governing marine living resources, mining, forestry, biodiversity, protected areas, pollution, air quality, waste and integrated coastal management. Principle number 3 determines that a development must be socially, environmentally and economically sustainable. Principle Number 4(a) states that all relevant factors must be considered, inter alia i) that the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied; ii) that pollution and degradation of the environment are avoided, or, where they cannot be altogether avoided, are minimised and remedied; vi) that the development, use and exploitation of renewable resources and the ecosystems of which they are part do not exceed the level beyond which their integrity is jeopardised; and viii) that negative impacts on the environment and on peoples’ environmental rights be anticipated and prevented, and where they cannot be altogether prevented, are minimised and remedied.

National Environmental Management: Biodiversity Act (Act 10 of 2004)

The National Environmental Management: Biodiversity Act (Act 10 of 2004) (NEMBA) provides for “the management and conservation of South Africa’s biodiversity within the framework of the NEMA, the protection of species and ecosystems that warrant national protection, and the use of indigenous biological resources in a

sustainable manner, amongst other provisions". The Act states that the state is the custodian of South Africa's biological diversity and is committed to respect, protect, promote and fulfil the constitutional rights of its citizens.

Furthermore, NEMBA states that the loss of biodiversity through habitat loss, degradation or fragmentation must be avoided, minimised or remedied. The loss of biodiversity includes inter alia the loss of threatened or protected species. Biodiversity offsets are a means of compensating for the loss of biodiversity after all measures to avoid, reduce or remedy biodiversity loss have been taken, but residual impacts still remain and these are predicted to be medium to high. Chapter 5 of NEMBA (Sections 73 to 75) regulates activities involving invasive species, and lists duty of care as follows:

- the land owner/land user must take steps to control and eradicate the invasive species and prevent their spread, which includes targeting offspring, propagating material and regrowth, in order to prevent the production of offspring, formation of seed, regeneration or re-establishment;
- take all required steps to prevent or minimise harm to biodiversity; and
- ensure that actions taken to control/eradicate invasive species must be executed with caution and in a manner that may cause the least possible harm to biodiversity and damage to the environment.

An amendment to the NEMBA has been promulgated, which lists 225 threatened ecosystems based on vegetation types present within these ecosystems. Should a project fall within a vegetation type or ecosystem that is listed, actions in terms of NEMBA are triggered. Based on the preliminary sensitivity screening undertaken for the proposed site, none of the threatened ecosystems occur within the study area. This will be confirmed as part of the Ecological Impact Assessment study undertaken during the EIA Phase.

The National Heritage Resources Act (Act 25 of 1999)

The National Heritage Resources Act (Act 25 of 1999) (NHRA) introduces an integrated and interactive system for the managements of national heritage resources (which include landscapes and natural features of cultural significance).

Parts of sections 35(4), 36(3) (a) and 38(1) (8) of the NHRA apply to the proposed project:

Archaeology, palaeontology and meteorites:

Section 35 (4) No person may, without a permit issued by the responsible heritage resources authority:

- a) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;
- b) destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;
- c) bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites.

Burial grounds and graves:

Section 36 (3) (a) No person may, without a permit issued by South African Heritage Resources Agency (SAHRA) or a provincial heritage resources authority:

- a) destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;
- b) destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority; or
- c) bring onto or use at a burial ground or grave referred to in paragraph (a) or (b) any excavation equipment, or any equipment which assists in the detection or recovery of metals.

Heritage resources management:

38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorized as:
- a) the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length;
 - b) the construction of a bridge or similar structure exceeding 50 m in length;
 - c) any development or other activity which will change the character of the site –
 - (i) exceeding 5000 m² in extent, or
 - (ii) involving three or more erven or subdivisions thereof; or
 - (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or
 - (iv) the costs of which will exceed a sum set in terms of regulations by SAHRA, or a provincial resources authority;
 - d) the re-zoning of a site exceeding 10 000 m² in extent; or
 - e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.

While landscapes with cultural significance do not have a dedicated Section in the NHRA, they are protected under the definition of the National Estate (Section 3). Section 3(2)(c) and (d) list “historical settlements and townscapes” and “landscapes and natural features of cultural significance” as part of the National Estate. Furthermore, Section 3(3) describes the reasons a place or object may have cultural heritage value. Section 38 (2a) of the NHRA states that if there is reason to believe that heritage resources will be affected then an impact assessment report must be submitted.

NOTE: A Desktop Heritage Assessment will be undertaken as part of the EIA Phase. Based on existing heritage information for the area and confirmation from Heritage Western Cape that there are no significant heritage resources present on *neighbouring* sites, it is unlikely that any significant heritage concerns will be raised.

Conservation of Agricultural Resources Act (Act 43 of 1983)

The objectives of the Conservation of Agricultural Resources Act (Act 43 of 1983) (CARA) are to provide for the conservation of the natural agricultural resources of South Africa by the:

- maintenance of the production potential of land;
- combating and prevention of erosion and weakening or destruction of the water sources; and
- protection of the vegetation and the combating of weeds and invader plants.

The CARA states that no land user shall utilise the vegetation of wetlands (a watercourse or pans) in a manner that will cause its deterioration or damage. This includes cultivation, overgrazing, diverting water run-off and other developments that damage the water resource. The CARA includes regulations on alien invasive plants. According to the amended regulations (GN R280 of March 2001), declared weeds and invader plants are divided into three categories:

- Category 1 may not be grown and must be eradicated and controlled,
- Category 2 may only be grown in an area demarcated for commercial cultivation purposes and for which a permit has been issued, and must be controlled, and
- Category 3 plants may no longer be planted and existing plants may remain as long as their spread is prevented, except within the flood line of watercourses and wetlands. It is the legal duty of the land user or land owner to control invasive alien plants occurring on the land under their control.

Should alien plant species occur within the study area; this will be managed in line with the EMPr. Rehabilitation after disturbance to agricultural land is also managed by CARA. The DAFF reviews and approves applications in terms of these Acts according to their Guidelines for the evaluation and review of applications pertaining to renewable energy on agricultural land, dated September 2011.

National Water Act (Act 36 of 1998)

One of the important objectives of the National Water Act (Act 36 of 1998) (NWA) is to ensure the protection of the aquatic ecosystems of South Africa's water resources. Section 21 of this Act identifies certain land uses, infrastructural developments, water supply/demand and waste disposal as 'water uses' that require authorisation (licensing) by the Department of Water and Sanitation (DWS). Chapter 4 (Part 1) of the NWA sets out general principles for the regulation of water use. Water use is defined broadly in the NWA, and includes taking and storing water, activities which reduce stream flow, waste discharges and disposals, controlled activities (activities which impact detrimentally on a water resource), altering the bed, banks, course or characteristics of a watercourse, removing water found underground for certain purposes, and recreation. In general a water use must be licensed unless it is listed in Schedule I, is an existing lawful use, is permissible under a general authorisation, or if a responsible authority waives the need for a licence. The Minister may limit the amount of water which a responsible authority may allocate. In making regulations the Minister may differentiate between different water resources, classes of water resources and geographical areas.

All water users who are using water for agriculture: aquaculture, agriculture: irrigation, agriculture: watering livestock, industrial, mining, power generation, recreation, urban and water supply service must register their water use. This covers the use of surface and ground water.

Section 21 of the Act lists the following water uses that need to be licensed:

- a) taking water from a water resource;
- b) storing water;
- c) impeding or diverting the flow of water in a watercourse;
- d) engaging in a stream flow reduction activity contemplated in section 36;
- e) engaging in a controlled activity identified as such in section 37(1) or declared under section 38(1);
- f) discharging waste or water containing waste into a water resource through a pipe, canal, sewer, sea outfall or other conduit;
- g) disposing of waste in a manner which may detrimentally impact on a water resource;
- h) disposing in any manner of water which contains waste from, or which has been heated in, any industrial or power generation process;
- i) altering the bed, banks, course or characteristics of a watercourse;
- j) removing, discharging or disposing of water found underground if it is necessary for the efficient continuation of an activity or for the safety of people; and
- k) using water for recreational purposes.

Any activities that take place within a water course or within 500 m of a wetland boundary require a Water Use Licence (WUL) under the Section 21 (c) and Section 21 (i) of the NWA. The need for a Water Use Licence will be determined in the EIA Phase.

National Environmental Management: Air Quality Act (Act 39 of 2004)

The aim of this act is to reform the law regulating air quality in order to protect the environment by providing reasonable measures for the prevention of pollution and ecological degradation and for securing ecologically sustainable development while promoting justifiable economic and social development; to provide for national norms and standards regulating air quality monitoring, management and control by all spheres of government; for specific air quality measures.

Development Facilitation Act (Act 67 of 1995)

The Development Facilitation Act (Act 67 of 1995) (DFA) sets out a number of key planning principles which have a bearing on assessing proposed developments in light of the national planning requirements. The planning principles most applicable to the study area include:

- Promoting the integration of the social, economic, institutional and physical aspects of land development;
- Promoting integrated land development in rural and urban areas in support of each other;
- Promoting the availability of residential and employment opportunities in close proximity to or integrated with each other;
- Optimising the use of existing resources including such resources relating to agriculture, land, minerals, bulk infrastructure, roads, transportation and social facilities;
- Contributing to the correction of the historically distorted spatial patterns of settlement in the Republic and to the optimum use of existing infrastructure in excess of current needs;
- Promoting the establishment of viable communities; and
- Promoting sustained protection of the environment.

Hazardous Substances Act (Act 15 of 1973)

This Act provides for the control of substances which may cause injury or ill health to, or death, of human beings by reason of their toxic, corrosive, irritant, strongly sensitising or flammable nature. To provide for the prohibition and control of the importation, manufacture, sale, use, operation, application, modification, disposal or dumping of such substances and products.

Other Applicable Legislation

Other applicable national legislation that may apply to the proposed project include:

- Integrated Resource Plan for Electricity (IRP) (GN R400, 6 May 2011)
- Electricity Act (Act 41 of 1987);
- Electricity Regulations Amendments (August 2009);
- Energy Efficiency Strategy of the Republic of South Africa (Department of Minerals and Energy (DME) now operating as Department of Mineral Resources (DMR), March, 2005);
- Promotion of Administrative Justice Act (Act 2 of 2000);
- Integrated Resource Plan for South Africa (2010);
- Occupational Health and Safety Act (Act 85 of 1993), as amended by Occupational Health and Safety Amendment (Act 181 of 1993);
- Fencing Act (Act 31 of 1963);
- National Environmental Management: Protected Areas Act (NEM:PA) (Act 31 of 2004);
- National Environmental Management: Waste Management Act (Act 59 of 2008); and
- National Road Traffic Act (Act 93 of 1996).

4.2.2 Regional Planning Legislation

Blaauwberg District Spatial Development Plan and Environmental Management Framework (2011)

Due to the relatively large amounts of undeveloped land within the urban edge of the Blaauwberg district, combined with the fact that land outside the urban edge in the district is of lower agricultural quality than in other areas of the City, the district is viewed as a major growth axis of the City. However, the undeveloped land parcels within the Blaauwberg district contain some of the last remaining tracts of two of South Africa's rarest vegetation types, namely Sand Plain Fynbos and West Coast Renosterveld. From a biodiversity perspective, it is imperative that high conservation worthy remnants is protected and that ecological corridors are provided to allow for the movement of fauna and flora.

This situation often leads to conflict between environmental and developmental objectives within the district. The challenge is therefore to create a balance between these competing needs to ensure the sustainability of

the district, the environment and communities. The form and location of development therefore needs to happen in a way that allows for the provision and accommodation of the development needs of a growing City, but still ensures the sustainable conservation of valuable natural assets. The direction, form and phasing of growth within the district needs to be managed and directed to ensure resource protection and linked infrastructure provision. The district SDP needs to begin to provide guidance in this regard, particularly in relation to the phasing of development in the short and medium term as a guide to infrastructure provision. The phasing of development in the district should take guidance from the City SDF in terms of overall City growth.

The removal of tax relief incentives for industrial development in Atlantis and the poor historic settlement patterns resulting in isolated nodes with very limited access to employment opportunities (Atlantis and Mamre) have been identified as pressures and constraints for this district that need to be addressed. Also to be addressed are high levels of unemployment, and the associated socio-economic pressures, particularly in Doornbach, Du Noon, Saxonworld, Witsand, Tafelozono and the outlying settlements of Atlantis and Mamre.

Guidelines, Frameworks and Protocols

- Public Participation Guideline, October 2012 (Government Gazette 35769);
- DEADP and DEA Guidelines published in terms of the NEMA EIA Regulations, in particular:
 - Guideline on Transitional Arrangements (DEADP, March 2013);
 - Guideline on Alternatives (DEADP, March 2013);
 - Guideline on Public Participation (DEADP, March 2013); and
 - Guideline on Need and Desirability (DEADP, March 2013);
- Information Document on Generic Terms of Reference for EAPs and Project Schedules (March 2013);
- Integrated Environmental Management Information Series (Booklets 0 to 23) (Department of Environmental Affairs and Tourism (DEAT), 2002 – 2005);
- Guidelines for Involving Specialists in the EIA Processes Series (DEADP; CSIR and Tony Barbour, 2005 – 2007);
- United Nations Framework Convention on Climate Change (1997); and
- Kyoto Protocol (which South Africa acceded to in 2002).

4.2.3 International Finance Corporation Performance Standards

In order to promote responsible environmental stewardship and socially responsible development, the proposed Atlantis GreenTech project will, as far as practicable, incorporate the environmental and social policies of the International Finance Corporation (IFC). These policies provide a frame of reference for lending institutions to review of environmental and social risks of projects, particularly those undertaken in developing countries.

Through the Equator Principles, the IFC's standards are now recognised as international best practice in project finance. The IFC screening process categorises projects into A, B or C in order to indicate relative degrees of environmental and social risk. The categories are:

- Category A - Projects expected to have significant adverse social and/or environmental impacts that are diverse, irreversible, or unprecedented.
- Category B - Projects expected to have limited adverse social and/or environmental impacts that can be readily addressed through mitigation measures.
- Category C - Projects expected to have minimal or no adverse impacts, including certain financial intermediary projects.

Accordingly, projects such as the proposed Atlantis GreenTech project are categorised as Category B projects. The EA Process for Category B projects examines the project's potential negative and positive environmental impacts and compares them with those of feasible alternatives (including the 'without project' scenario). As required for Category B projects a Scoping and EIA Process is being undertaken.

Other Acts, standards and/or guidelines which may also be applicable will be reviewed in more detail as part of the specialist studies to be conducted for the EIA.

4.3 PRINCIPLES FOR SCOPING AND PUBLIC PARTICIPATION

The public participation process (PPP) for this Scoping and EIA Process is being driven by a stakeholder engagement process that will include inputs from authorities, I&APs, technical specialists and the project proponent. Guideline 4 on “Public Participation in support of the EIA Regulations” published by DEAT in May 2006, states that public participation is one of the most important aspects of the EA Process. This stems from the requirement that people have a right to be informed about potential decisions that may affect them and that they must be afforded an opportunity to influence those decisions. Effective public participation also improves the ability of the Competent Authority (CA) to make informed decisions and results in improved decision-making as the view of all parties are considered.

An effective PPP could therefore result in stakeholders working together to produce better decisions than if they had worked independently.

- It provides an opportunity for I&APs, EAPs and the CA to obtain clear, accurate and understandable information about the environmental impacts of the proposed activity or implications of a decision;
 - Provides I&APs with an opportunity to voice their support, concern and question regarding the project, application or decision;
 - Enables an applicant to incorporate the needs, preferences and values of affected parties into its application;
 - Provides opportunities for clearing up misunderstanding about technical issues, resolving disputes and reconciling conflicting interests;
 - Is an important aspect of securing transparency and accountability in decision-making; and
 - Contributes toward maintaining a health, vibrant democracy.

To the above, one can add the following universally recognised principles for public participation:

- Inclusive consultation that enables all sectors of society to participate in the consultation and assessment processes;
- Provision of accurate and easily accessible information in a language that is clear and sufficiently non-technical for I&APs to understand, and that is sufficient to enable meaningful participation;
- Active empowerment of grassroots people to understand concepts and information with a view to active and meaningful participation;
- Use of a variety of methods for information dissemination in order to improve accessibility, for example, by way of discussion documents, meetings, workshops, focus group discussions, and the printed and broadcast media;
- Affording I&APs sufficient time to study material, to exchange information, and to make contributions at various stages during the assessment process;
- Provision of opportunities for I&APs to provide their inputs via a range of methods, for example, via briefing sessions, public meetings, written submissions or direct contact with members of the EIA team.
- Public participation is a process and vehicle to provide sufficient and accessible information to I&APs in an objective manner to assist I&APs to identify issues of concern, to identify alternatives, to suggest opportunities to reduce potentially negative or enhance potentially positive impacts, and to verify that issues and/or inputs have been captured and addressed during the assessment process.

At the outset it is important to highlight two key aspects of public participation:

- There are practical and financial limitations to the involvement of all individuals within a PPP. Hence, public participation aims to generate issues that are representative of societal sectors, not each individual. Hence, the PPP will be designed to be inclusive of a broad range of sectors relevant to the proposed project.
- The PPP will aim to raise a diversity of perspectives and will not be designed to force consensus amongst I&APs. Indeed, diversity of opinion rather than consensus building is likely to enrich ultimate decision-making. Therefore, where possible, the PPP will aim to obtain an indication of trade-offs that all stakeholders (i.e. I&APs, technical specialists, the authorities and the development proponent) are willing to accept with regard to the ecological sustainability, social equity and economic growth associated with the project.

4.4 OBJECTIVES OF THE SCOPING PROCESS

This Scoping Process is being planned and conducted in a manner that is intended to identify and provide sufficient information to enable the authorities to reach a decision regarding the scope of issues to be addressed in this EIA Process, and in particular to convey the range of specialist studies that will be included as part of the Environmental Impact Reporting Phase of the EIA, as well as the approach to these specialist studies.

As highlighted in Chapter 1 of this Scoping Report, within this context, the objectives of this Scoping Process (as per the 2014 EIA Regulations, as amended) are to:

- Identify and inform a broad range of stakeholders about the proposed development;
- Confirm the process to be followed and opportunities for stakeholder engagement;
- Clarify the project scope to be covered;
- Identify and confirm the preferred activity and technology alternative;
- Identify and confirm the preferred site for the preferred activity;
- Clarify the alternatives being considered and ensure due consideration of alternative options regarding the proposed development, including the “No-go” option;
- Conduct an open, participatory and transparent approach and facilitate the inclusion of stakeholder issues in the decision-making process;
- Identify and document the key issues to be addressed in the impact assessment phase (through a process of broad-based consultation with stakeholders) and the approach to be followed in addressing these issues; and
- Confirm the level of assessment to be undertaken during the impact assessment

4.5 TASKS IN THE SCOPING PHASE

This section provides an overview of the tasks being undertaken in the Scoping Phase, with a particular emphasis on providing a clear record of the PPP followed. As discussed in Chapter 1 of this Scoping Report, a GreenTech project is being proposed by the Applicant which requires a Scoping and EIA Process.

TASK 1: I&AP IDENTIFICATION, REGISTRATION AND THE CREATION OF AN ELECTRONIC DATABASE

Prior to advertising the EA Process in the local print media an initial database of I&APs (including key stakeholders and organs of state) was developed for the Scoping Process. This was supplemented with input from the EIA Project Managers, CSIR, and the Project Applicant, CoCT. A total of 95 I&APs were included on the project database in this manner. Appendix B of this Scoping Report contains the current I&AP database, which has been updated to include requests to register interest in the project, and comments received. At the time of compiling this Scoping Report, the database stands at 95 I&APs, who will be informed about the availability of the Draft Scoping Report for comment.

While I&APs have been encouraged to register their interest in the project from the start of the process, following the public announcements (refer to Task 2), the identification and registration of I&APs will be ongoing for the duration of the study. Stakeholders from a variety of sectors, geographical locations and/or interest groups can be expected to show an interest in the proposed project, for example:

- Provincial and Local Government Departments;
- Local interest groups, for example, Councillors and Rate Payers associations;
- Surrounding landowners;
- Farmer Organisations;
- Environmental Groups and NGOs; and
- Grassroots communities and structures.

In terms of the electronic database, I&AP details are being captured and automatically updated as and when information is distributed to or received from I&APs. This ongoing record of communication is an important component of the PPP. It must be noted that while not required by the regulations, those I&APs proactively identified at the outset of the Scoping Process will remain on the project database throughout the EIA Process and will be kept informed of all opportunities to comment and will only be removed from the database by request.

TASK 2: ANNOUNCEMENT OF THE SCOPING PROCESS

In order to notify and inform the public of the proposed project and invite I&APs to register on the project database, the project and EIA Process has been advertised in the Cape Times (English) and Die Burger (Afrikaans) concurrently with the release of the pre-application version of the Draft Scoping Report. Copies of the advertisements are included in **Appendix C** of this updated Draft Scoping Report.

Regulation 41 (2) (a) of the 2014 EIA Regulations require that a notice board providing information on the project and EIA Process is fixed at a place that is conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of the site where the application will be undertaken or any alternative site. A copy of the notice boards and proof of placement thereof are included in **Appendix C** of this Draft Scoping Report.

TASK 3: ONGOING COMMUNICATION AND CAPACITY BUILDING

The process for this Scoping and EIA aims to ensure that people are involved from the outset, that we proactively solicit the involvement of stakeholders representing all three dimensions of sustainability (i.e. biophysical, social and economic dimensions), and that we provide them with sufficient and accessible information to contribute meaningfully to the process. In this manner, the PPP aims to build the capacity of stakeholders to participate.

Within the context of the EIA Process, capacity building is not viewed as a “once off” event, but rather a series of events and/or information sharing which provides information on a continuous basis thereby building the capacity and knowledge of I&APs to effectively participate in the EIA Process and raise issues of concern.

One of the challenges facing the PPP is the diversity of South African society. Public participation by its very nature is a dynamic process with various sectors of society having varying needs, values and interests. The core question for public participation is “*How can I, the interested and affected party, meaningfully participate in the process?*” This varies according to the needs of I&APs. The PPP should be inclusive of all I&APs, and afford them the opportunity to raise their issues and concerns in a manner that suits them. Coupled with this South African society is characterized by varying socio-economic, literacy and language levels all of which need to be considered in the participation process. For example, certain I&APs may want to receive documentation only and not attend meetings, some I&APs may want to only attend meetings, other I&APs may not want to attend

meetings and send their comments in writing, and some I&APs may want to be actively involved throughout the process.

In order to accommodate the varying needs of I&APs and develop their capacity to participate in the process, information sharing forms an integral and ongoing component of the EIA Process to ensure effective public participation. The following provides an overview of how information sharing is being effected throughout the EIA Process in order to develop the capacity of I&APs to effectively engage in the PPP:

- **Website** – placing EIA related project information on the project website <https://www.csir.co.za/environmental-impact-assessment>
- **Language** – encouraging I&APs to use the language of their choice at meetings or during telephonic discussions and providing translations at meetings in Afrikaans, when required;
- **Newspaper Advertisements** Cape Times (English) and Die Burger (Afrikaans) on 25 October 2018 (Appendix C)- requesting I&APs to register their interest in the project, raise issues of concern or notifying I&APs of potential public meetings (if required to be held);
- **Report Distribution** – providing hard copies of the Scoping and EIA Reports at local library (Avondale Public Library) for I&APs to access for viewing. Electronic copies of the reports will also be loaded onto the project website for access. Key organs of state will be provided with hard copies and/or electronic copies of the reports;
- **Public Meeting** – a public meeting could possibly be held during the review of the EIA Report if warranted and if there is substantial public interest during the EIA Phase. Furthermore, telephonic consultations with key I&APs will take place, upon request; and
- **Focus Group Meetings** – may be undertaken (depending on the interest in the projects) with key I&AP groups (Councillors, ratepayers association, surrounding landowners, affected organs of state, environmental organisations).

Documents will continuously being posted onto the project website (<https://www.csir.co.za/environmental-impact-assessment>) as and when they become available and I&APs will be notified accordingly.

TASK 4: CONSULTATION WITH AUTHORITIES

All public participation documentation will reach the DEA&DP, as well as other relevant authorities and organs of state included on the I&AP database. Comments received on the NID and the pre-application Scoping Process from the authorities have been included in the Comments and Response Trail as **Appendix E** to this Draft Scoping Report (which has been submitted to the DEA&DP for comment in conjunction with an Application for EA in line with Regulation 22 of the 2014 EIA Regulations, as amended).

TASK 5: TECHNICAL SCOPING WITH PROJECT PROPONENT AND EIA TEAM

The Scoping Process has been designed to incorporate two complementary components: a stakeholder engagement process that includes the relevant authorities and wider I&APs; and a technical process involving the EIA team and the project proponent.

The purpose of the technical Scoping Process is to draw on the past experience of the EIA team and the project proponent to identify environmental issues and concerns related to the proposed project, and confirm that the necessary specialist studies have been identified. The specialist team has worked with the CSIR on several other projects in the Western Cape, as well as projects specifically in the Atlantis SEZ. The specialists were therefore able to identify issues (as shown in Chapter 6 of this Scoping Report) to be addressed in the EIA based on their experience and knowledge of the area and type of activity. Their inputs have informed the scope and Terms of Reference for the specialist studies (as included in Chapter 7 of this Scoping Report). The findings of the Scoping Process with the public and the authorities will inform the specialist studies, which will only be completed after the public Scoping Process has been finalised.

TASK 6: REVIEW OF THE DRAFT SCOPING REPORT (CURRENT STAGE)

This stage in the process entails the release of the Draft Scoping Report for a 30-day period for public review (in line with Regulation 3 (8) and Regulation 21 (1) of the 2014 EIA Regulations, as amended). It must be noted that a pre-application Draft Scoping Report was released with the NOI from the **25th October 2018 to the 26th November 2018**. This version (i.e. version 2) of the Draft Scoping Report which is being submitted following the Application for EA will include the notification to I&As of the 30 day comment period. Please note that the Competent Authority (DEA&DP) was included in this review process, as comments from the Competent Authority on the Draft Scoping Report are **required** by Regulation 21 (1) of the 2014 EIA Regulations. **Appendix E** includes all comments received by I&As on the pre-application DSR as well as responses from the EAP.

The following mechanisms and opportunities will be utilised to notify I&As of the release of the Draft Scoping Report for comment:

- **Correspondence to I&As** - Letter to notify I&As of the the project and the opportunity to comment on the Draft Scoping Report. The comment period was sent via registered mail and email (where postal, physical and email addresses are available for I&As and organs of state on the project database).
- **Availability of Information** - the Draft Scoping Report was made available for review by I&As and key authorities through the following means:
 - The Draft Scoping Report was placed on the project website (<https://www.csir.co.za/environmental-impact-assessment>)
 - The Draft Scoping Report was placed at the Avondale Public Library.
 - Key authorities were provided with either a hard copy and/or CD of the Draft Scoping Report
 - Telephonic consultations will be held with key I&AP and organs of state groups, as necessary.

Appendix D contains proof of all correspondence to and from I&As to date. Following the 30 day review of this Draft Scoping Report, all issues will be captured in a comments and responses trail which will be included in the Final Scoping Report to be submitted to the Competent Authority (DEA&DP).

TASK 7: SUBMISSION OF SCOPING REPORTS TO THE DEA FOR DECISION-MAKING

An updated Scoping Report, reflecting the comments received during the above mentioned commenting period, will be submitted to the DEA&DP for decision-making in line with Regulation 22 of the 2014 EIA Regulations. In line with best practice, I&As on the project database will be notified of the submission of the Scoping Reports to the DEA&DP for decision-making.

The Final Scoping Report that is submitted for decision-making will also include proof of the PPP that was undertaken to inform organs of state and I&As of the availability of this Draft Scoping Report for the 30 day review (during Task 7, as explained above). It will also include proof of the newspaper advertisements placed to inform the public to register as an I&AP, site notices places and all other communications with I&As.

The DEA&DP will have 43 days (from receipt of the Final Scoping Report) to either accept the Scoping Reports with or without conditions, or refuse EA. This step marks the end of the PPP for the Scoping Phase. The PPP for the subsequent EIA Phase is presented in the Plan of Study for EIA (Chapter 7).

4.6 SCHEDULE FOR THE EIA

The proposed schedule for the EIA, based on the legislated EIA Process, is presented in Table 4.2. The table highlights actions going forward for the proposed project. It should be noted that this schedule could be revised during the EIA Process, depending on factors such as the time required for decisions from authorities.

Table 4.2: Project schedule for the Atlantis GreenTech Project

	Feb-19				Mar-19				Apr-19				May-19				Jun-19				Jul-19				Aug-19					
	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3
Prepare Scoping Report and Plan of Study for EIA (PSEIA) and Application for EA																														
Client review																														
Printing of reports (DCP printers - 1 week)																														
Scoping Report public review period (PPP 2)																														
Collate comments received and integrate into Scoping Report																														
Client sign-off and printing (DCP)																														
Submission of Final Scoping Report to Competent Authority																														
Specialist studies Draft Reports due for review by CSIR and Green Cape																														
CSIR and Green Cape review of specialist studies																														
Competent Authority to Accept Scoping Reports or Refuse EA.																														
Prepare EIR and EMPR																														
Green Cape review of EIR and EMPR																														
Printing of reports (DCP printers - 1 week)																														
EIR public review period																														
Collate comments received and integrate into EIR and EMPR																														
Client sign-off and printing (DCP)																														
Submission of EIR to Competent Authority																														
Competent Authority to Grant or Refuse EA																														
Notify I&APs of the EA decision.																														

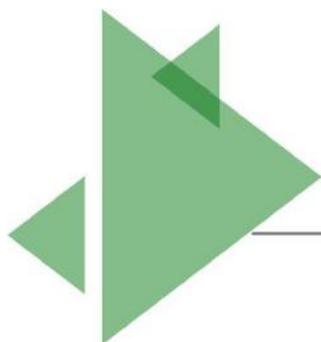
Scoping and Environmental Impact Assessment (EIA) for GreenTech in Zone 2
of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

DRAFT SCOPING REPORT



CHAPTER 5

PROJECT ALTERNATIVES



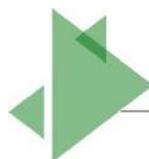
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5 PROJECT ALTERNATIVES

The 2014 NEMA EIA Regulations (GN R326), as amended on 7 April 2017, define “alternatives”, in relation to a proposed activity, as “*different means of meeting the general purpose and requirements of the activity, which may include alternatives to the:*

- property on which or location where the activity is proposed to be undertaken;
- type of activity to be undertaken;
- design or layout of the activity;
- technology to be used in the activity; or
- operational aspects of the activity; and
- includes the option of not implementing the activity”.

Additionally, Appendix 2 of the 2014 NEMA EIA Regulations (as amended) provides the objectives of the Scoping Process in relation to alternatives as **identification and confirmation** of the:

- **preferred activity and technology** alternative through an impact and risk assessment and ranking process; and
- **preferred site**, through a detailed site selection process, which includes an impact and risk assessment process inclusive of cumulative impacts and a ranking process of all the identified alternatives focusing on the geographical, physical, biological, social, economic, and cultural aspects of the environment.

The Scoping Report is therefore required to provide a full description of the process followed to reach the proposed preferred activity, technology, site and location within the site, including details of all the alternatives considered and the outcome of the site selection matrix.

The need to include investigation and assessment of impacts associated with alternatives to the proposed project within an EIA are also highlighted within Sections 24(4) (b) (i) and 24(4A) of the NEMA. In addition, Section 24O (1)(b)(iv) also requires that the Competent Authority, when considering an application for EA, takes into account “where appropriate, any feasible and reasonable alternatives to the activity which is the subject of the application and any feasible and reasonable modifications or changes to the activity that may minimise harm to the environment”.

As such, the assessment of alternatives should, as a minimum, include the following:

- The consideration of the no-go alternative as a baseline scenario;
- A comparison of the reasonable and feasible alternatives; and
- Providing a methodology for the elimination of an alternative.

This chapter discusses the selection of the preferred alternatives that will be assessed as part of the EIA Phase.

5.1 NO-GO ALTERNATIVE

The no-go alternative assumes that the proposed project will not go ahead i.e. the proposed Atlantis GreenTech project is not constructed and developed into an operational energy facility. This alternative entails that the development of the proposed GreenTech facility would not drive any environmental change and result in no environmental impacts on the site or surrounding local area. It provides the *status quo* or baseline against which other alternatives are compared and will be considered throughout the report. At present the proposed site is zoned for “General Industrial” use, and is not being utilized (natural vegetation). Preliminary investigations indicate that area is classified as non-arable and low potential grazing land – hence, utilising the area for continued agricultural land-use is not a preferred or sustainable alternative.

The costs/implications and benefits of implementing the ‘no-go’ alternative is presented in Table 5.1. Implementing the ‘no-go’ alternative entails that this **GreenTech facility will not be contributing to environmental, social and economic change** (positive/negative) in the area surrounding the proposed project site.

Table 5.1: Costs and benefits of implementing the ‘no-go’ alternative (i.e. no GreenTech facility development).

COSTS	BENEFITS
<ul style="list-style-type: none"> • No opportunities for investment in the green economy in Atlantis and the Western Cape will arise through means of GreenTech manufacturing by this project at this location. • A GreenTech facility is not present to assist Government in achieving its renewable energy generation targets. • No diversification of the local economy. • The local municipality’s vulnerability to economic downturns will increase because of limited access to capital. • No additional employment opportunities will be created. Both skilled and unskilled employment opportunities are anticipated to be created for the construction and operation of the GreenTech facility. • No additional opportunities for skills transfer and education/training of local communities created. • Potential positive socio-economic impacts likely to result from the project, such as increased local spending and the creation of local employment opportunities, will not be realised. 	<ul style="list-style-type: none"> • No threatened vegetation will be disturbed or removed. • The current landscape character will not be altered by a GreenTech facility. • No influx of people (mainly job-seekers), driven by the development of a facility will occur, which entails that there would not be additional pressures on the infrastructure and service delivery of local municipalities and towns in the area. • No fragmentation of habitat or disturbance to faunal species.

South Africa is an energy intensive country, largely as a result of our historic economic focus on energy intensive industries such as mining and primary metal processing. With current energy and electricity demands projected to continue increasing, new investments in electricity generation capacity are required. The planned roll-out of renewable energy in South Africa will result in investments of R10-20 billion every year for the next 20 years. The manufacturing industry to support this renewable energy roll-out will be significant. It is estimated that about 2200 blue collar jobs will be created in this new industry. The Provincial strategic vision and intent is that the Western Cape has a secure supply of quality, reliable, clean, safe energy, which delivers social, economic and environmental benefits to the Province’s citizens, while also addressing the climate change challenges facing the region and eradicating energy poverty. The Western Cape Provincial Government and the City of Cape Town (CoCT) have joined together in support of the renewable energy industry.

On the other hand, the development of the proposed Atlantis GreenTech project will also result in negative environmental impacts (as detailed in Chapter 6 of this report). However, given the socio-economic and environmental realities relevant to the project area; it is expected that the positive impacts of the proposed project will outweigh its negative impacts. Importantly, CSIR anticipates that the balance of positive and negative impacts resulting for the proposed project will result in a nett benefit when compared to the no-go alternative.

In summary, it is generally assumed that the “no-go” alternative will not directly drive any negative environmental and social impacts. However, the assumption that the *status quo* merely represents an environmentally-neutral, and value-neutral stable state is incorrect on at least two accounts. Firstly, the status quo may be unsustainable or unjust (e.g. the *status quo* might be driving the growth and spread of alien invasive species; or might prevent a highly marginalised community from accessing employment). It follows that merely allowing an unsustainable/unjust *status quo* to continue, will not result in a value-neutral state where no further negative impacts will manifest as a result of the proposed project not being developed. Secondly, socio-

economic and environmental processes do not cease to function in a *status quo* environment. Accordingly, the vagaries of changing environmental and macro/micro economic conditions will continue to result in both positive and negative impacts to the local environment; regardless of whether the proposed project is developed or not. It is therefore important not to reflectively ascribe neutral values to the no-go option.

Similarly, developers often depreciate the *status quo* as not being able to provide positive benefits to the local community in the absence of a proposed project. Clearly, such an approach also offends against the principle that the *status quo* is not a neutral condition.

However, given the socio-economic and environmental realities of the receiving environment (Table 5.1); the costs of the no-go alternative appear to outweigh its potential benefits. Based on the above, the “no-go” alternative is **not deemed to be the preferred alternative** but will be taken forward and indirectly considered within the EIA Phase as this alternative will serve as the baseline against which the potential impacts associated with the project are assessed.

5.2 LAND-USE ALTERNATIVE

When determining the appropriate land-use activity for the Atlantis GreenTech project site, there are several aspects that are essential in order to justify the rationale for this activity. The Integrated Resource Plan for South Africa for the period 2010 to 2030 (referred to as “IRP2010”) and the IRP Updated Report (2013) proposes to secure 17 800 MW of renewable energy capacity by 2030. The DOE subsequently has entered into a bidding process for the procurement of 3725 MW of renewable energy from IPPs by 2016 and beyond to enable the Department to meet this target. On 18 August 2015, an additional procurement target of 6300 MW to be generated from renewable energy sources was added to the REIPPPP for the years 2021 - 2025, as published in Government Gazette 39111. The additional target allocated for wind energy, solar PV energy, and solar CSP energy is 3040 MW, 2200 MW, and 600 MW respectively. These are substantial amounts, translating to approximately 200 wind turbines annually and about 3 000 000 square meters of PV. Broadly, the cost to install wind or PV is R15-30mil per MW, in other words, the investment on these installations will be in the order of R10 – 20 billion per year, every year for the next 20 years.

The Department of Energy, aided by the National Treasury will issue a request for proposals (RFP). The conditions of this RFP will be based on BEE, local content, project readiness and price. The local content requirement will lead to the manufacture of components in South Africa. This anticipated local content will result in an investment of R1bn in manufacturing facilities. The combined turnover of these factories will be in the order of R 6 – 7 billion and employ approximately 6000 blue collar workers.

The Provincial strategic vision and intent is that the Western Cape has a secure supply of quality, reliable, clean, safe energy, which delivers social, economic and environmental benefits to the Province’s citizens, while also addressing the climate change challenges facing the region and eradicating energy poverty. It is a political and economic imperative that the Western Cape attracts a portion of the investment in Renewable Energy. Support for the economic activity behind renewable energy led to a research paper ‘GreenTech’ and the Provincial government to establish the GreenCape initiative – this initiative has the task of creating and supporting the manufacturing industry that will supply components for the roll-out of renewable energy in the Western Cape and South Africa. There has been further tacit support from the PGWC in investigations around defining the ‘Green Economy’ and reviewing the legislative framework looking to identify possible levers for development of this industry.

Atlantis has been identified as a development priority by National, Provincial and Regional government. Historically, Atlantis was a decentralisation zone for manufacturing. But, since the lifting of sanctions the manufacturing industry in Atlantis has struggled. The extension of the Bus Rapid Transit (BRT) system to Atlantis has created a public transport link between the City and Atlantis. This has increased labour mobility and supports industrial development. There is serviced, industrially zoned, vacant, City land in Atlantis. Atlantis is

strategically located to supply large components to the wind developments along the West Coast. The transport of these larger components is a costly and logistically challenging operation. Atlantis's proximity to the N7 and R27 allow a significant transportation advantages to all of the West coast developments.

It is for the above reasons that, not only is GreenTech the preferred land-use alternative for this site, but the manufacturing of renewable energy products through the establishment of a GreenTech manufacturing facility in Atlantis is considered the preferred activity alternative above all others.

5.3 TECHNOLOGY ALTERNATIVES

A description of the technological alternatives for the site are described below. These relate to GreenTech and other manufacturing-related activities. Green Technology (see description of GreenTech in Chapter 2) is the **preferred alternative for the site**, for the reasons given below. Other technologies for the site (that may not be as feasible as GreenTech due to the designation of the SEZ) are also described below. In terms of the preferred alternative, a combination of "Green Technologies" will form part of the project. It must be noted that the type of GreenTech to be undertaken on site will only be informed by investment opportunities in the SEZ. Thus, all of the feasible alternatives are being considered.

5.3.1 Green Technology (GreenTech) (Preferred Alternative)

- **Renewable Energy Components and Energy**

Based on the quantity of renewable energy in the IRP2010, it is anticipated that there will be enough demand to justify the following investments in manufacturing of the original equipment used in renewable energy power plants. In addition, the REIPPP specifically included local content as a prerequisite due to the lack of local manufacturing of renewable components.

The global wind turbine industry is among the fastest growing industries globally, with an average annual growth rate of nearly 30% between 2000 and 2010 (Grant Thornton, 2012). This growth has been driven mainly by significant cost reductions and efficiency improvements in the core components, supportive policies and the rising costs of alternative sources of energy, such as oil and diesel. The creation of a domestic manufacturing base for wind-turbine components has been a strategic priority for the government of South Africa in driving industrialisation and economic development. The domestic wind-turbine industry has therefore been supported by various promotional policies, such as local content requirements (LCRs) and economic incentives provided by the government. There is enough demand in the IRP2010 to justify 1 or more utility scale blade manufacturer. Currently there are few companies in South Africa that manufacture utility scale wind turbine blades. There is scope for 1 or 2 manufacturers of wind turbine towers.

It has been noted that key impediments of the localisation of solar PV is the lack of key local resources such as silicon, glass and skilled personnel, as well as the lack of sufficient demand to entice manufacturing facilities. It is estimated that a minimum annual demand of 600 MW is required in order for PV module manufacturers to be enticed to set up full PV module manufacturing facilities (Solar PV Baseline Report, SAPVIA, 2013). There is enough demand in the IRP2010 to justify 1 or 2 photo voltaic (PV) manufacturing facilities. Currently in South Africa there are 3 PV manufacturers (Tenesol, Solairedirect and Setsolar). These are all located in Cape Town and currently employ 250 people. There is an opportunity for these companies (or a new player) to set up a factory to supply the new demand. While developers have been able to meet local content requirements without sourcing modules from South Africa, additional solar manufacturers will increase the domestic supply of modules ahead of the upcoming bidding rounds.

With the Government's policy commitment on localisation, it is imperative that the private sector responds to their renewable energy policy imperatives. The REIPPP specifically included local content as a prerequisite due to

the lack of local manufacturing of renewable components, such as inverters. As mentioned above, a lack of local manufacturers is a major barrier to many bidders. There are several benefits to locating an inverter manufacturer within the Western Cape's green cluster, close to the supply chain. It is anticipated that there will be 1 inverter manufacturer established. There are currently two inverter manufacturers (MLT-Drives), however, they would need to scale up tenfold to meet this demand.

- ***Waste and Recycling***

Waste management is currently undergoing a major global paradigm shift. This shift is driven by issues of climate change, carbon economics and resource scarcity, and requires that waste no longer be viewed as an unwanted by-product requiring disposal to landfill, but rather as a renewable resource, suitable for re-introduction back into local and global economies. By fostering the reuse of waste, the lead market for waste management and recycling has the potential to reduce inputs of primary raw materials and the burden on the environment associated with their extraction. Green technologies within the waste space are therefore seen as technologies which will facilitate such a move up the waste hierarchy and which will maximise resource recovery.

- ***Water Efficiency***

The Western Cape is currently in the midst of a very severe drought with the dam's region having experienced the lowest annual rainfall over the period 2015 to 2017 since 1933. This has resulted in increased water supply risks, water restrictions and will see the introduction of higher water tariffs and regulations (review of 2010 water bylaws) to promote the uptake of water-efficient technologies. It is expected that this will continue to drive the demand for a range of water efficient devices and storage solutions, some of which can be made competitively by local producers.

5.3.2 Non-Green Technology related manufacturing

The manufacturing sector provides a locus for stimulating the growth of other activities, such as services, and achieving specific outcomes, such as employment creation and economic empowerment. This platform of manufacturing presents an opportunity to significantly accelerate the country's growth and development. Other opportunities for manufacturing in on the proposed site include Agriprocessing, Automotive, Chemicals, ICT and electronics, Metals, Textiles, clothing and footwear.

The suitability of alternative manufacturing facilities in the Atlantis Industrial area has decreased since the adoption of the Special Economic Zone which was gazetted on 19 October 2018 in Government Gazette 41982, Regulation No. 1130. The need and/or desirability of non GreenTech facilities would be minimal, as the area is designated for the manufacturing of green technologies and related services including wind and solar power technologies, alternative waste management, energy efficient technology, alternative building materials and other clean technologies. The GreenTech SEZ is of strategic provincial and national importance, and investment is focused on these types of technologies.

5.4 LAYOUT ALTERNATIVES

It is to be assumed that the entire site (32.6 ha) (in accordance with local planning policies) will be utilised for the activity. The buildings (coverage, height etc.) to be located on site will be in accordance with the existing zoning of the site and the location in which the site is situated i.e. 'General Industrial' and the Atlantis Industrial Area. The CoCT's building regulations and planning policies will be adhered to. Layout alternatives are therefore not possible to design at this stage as it would depend on the investors who are successful in terms of the bidding process to lease the land and in terms of what types of technology are being manufactured in accordance with the types of Green Technology alternatives. Refer to Chapter 2, Section 2.4 which describes the "Envelope

Approach” to be applied in this EIA. In addition, a “typical” layout is provided in Chapter 2 (Figure 2.2) for reference.

5.5 LOCATION/SITE ALTERNATIVES

CoCT has made several land portions in **Zone 2** of the Atlantis SEZ available for a green technology (Greentech) hub in Atlantis, Western Cape, for the purpose of developing a GreenTech facility (Figure 5.1, *Note*: although CA1183-72 are included in Zone 2 in this map, it does not form part of this EIA, as this portion is already utilised):

- Portion Rem of 277
- 246
- 254
- Portion Rem of 171

A site selection overview was undertaken to determine which sites within the SEZ (owned by the CoCT) were suitable for the proposed activity. The main determinant for Zone 2 as the preferred Alternative, is the size of the ERF's (combined) which allow for the suitability of such activities. In addition, Zone 2 is further away from sensitive receptors that some of the other zones in the SEZ. Some of the biggest contributing factors in selecting the Atlantis Industrial Area as the only viable site (in comparison to other industrial areas e.g. Montagu Gardens, Epping etc.) were as follows:

- Large portions of land were required in excess of 10-20 ha in order to accommodate the large factories/ lay-down areas required to manufacture the abnormal structures found within the Green Technology sector e.g. wind turbine blades. Land of this size, owned by the CoCT, is not available within the industrial areas of the City and therefore areas such as Montague Gardens, Epping, etc. are not feasible alternatives.
- In addition to the above, the transport network found within the City is not appropriate for transporting abnormal loads associated with the Green Technology sector. Cape Town Port facilities are also not appropriate for gaining access for the purposes of shipping and therefore finding land north of the City's central hub would be far more desirable.
- Furthermore, Atlantis is a distressed area in severe socio-economic crisis being a spatially and economically isolated area with little economic activity. Established in the apartheid era, Atlantis has a population of approximately 70 000 of which 98% belong to the group previously classified as coloured. With the removal of regional industrial incentives offered during the apartheid area, the attraction of Atlantis as a business location declined, contributing to the area's long-term economic decline and existence as a dormitory urban area that is in many senses disarticulated from the urban core of Cape Town. Despite notable industrial potential, Atlantis has limited commercial (mainly manufacturing) and service economic activity that has experienced severe curtailment given impacts of the recent economic crisis. Furthermore, Atlantis has been hard hit by the global and domestic economic crisis, with a loss of business and jobs. Rising unemployment is further compounded by high food price inflation, the hikes in electricity pricing and the current fuel price shock has had severe social implications in an already distressed area. Poverty and economic exclusion are rife. Out-dated 2001 Census estimates suggested that even then over half of Atlantis' population (51%) earned between R1 600 and R6 400 a month, while just over a third of the population (34%) earned below R1 600 a month. Over ten years on, economic hardship has exacerbated further given the impact of the recent global and economic recession, and social ills that are driven by crime, gangs, drugs and domestic violence, dominate daily reality in the area. The draft Atlantis Revitalization Framework is one of many policies that have been established with the aim to “articulate a constructive and meaningful working relationship where responsibilities between the key stakeholders – government, business, and civil society are agreed and shared, so as to enable successful implementation of the strategies and actions for the revitalisation and thereafter growth and development of Atlantis”. The proposed activity will assist with the aforementioned goals.

It is for the above reasons **Zone 2 in the Atlantis SEZ is considered the only viable site alternative** within the CoCT and is therefore the preferred site alternative above all others.

5.5.1 Key environmental attributes

As is evident from the positive Environmental Authorisations obtained for the same type of activities on one neighbouring and another nearby site in the Atlantis SEZ in 2012 (Proposed 'green technology manufacturing cluster' industrial development and associated infrastructure on portion 0 of farm CA1183 and portion 93 of farm ca4, Atlantis; Proposed 'green technology manufacturing cluster' industrial development and associated infrastructure on farm CA118 portion 4 and portion 1, Atlantis – Doug Jeffrey Environmental Consultants, 2012), the proposed site recommended for the proposed Atlantis GreenTech facility poses limited risk to biophysical, agricultural and human infrastructure.

The site contains remnants of endangered Cape Flats Dune Strandveld (Chapter 3) and offsetting as part of the Atlantis Industrial Incentives Scheme (Appendix F) will be undertaken in order to compensation for any potential loss of endangered vegetation resulting from subsequent development. The site does not fall within a CBA.

5.5.2 Spatial character

The site falls within an area earmarked by CoCT for the development of future green technology hub. Furthermore, the site is located in an area zoned for industrial development and is in close proximity to the existing Ankerlig CCGT and its supporting infrastructure. As a result, development of the proposed GreenTech facility on the site will be in keeping with the existing development character and zoning of the area. In addition, the Atlantis SEZ was adopted on 19 October 2018 in Government Gazette 41982, Regulation No. 1130, highlighting the National strategic importance of this area for industrial development.

5.5.3 Proximity to sensitive human structures

It is apparent that development on the site will have limited impact on potential sensitive human features present in the area, such as local community structures, purely as a result of it being located a good distance away from these structures (Table 5.2). This is a noteworthy consideration both in terms of potential noise emission, but also in terms of the inherent human health risk associated with manufacturing. The proposed development of the project may have a visual impact on sensitive visual receptors (e.g. members of the public and visitors to protected areas). However, the landscape has already been altered by industrial infrastructure (e.g. Ankerlig power station), and therefore limited visual impacts are anticipated from the proposed Atlantis SEZ development.

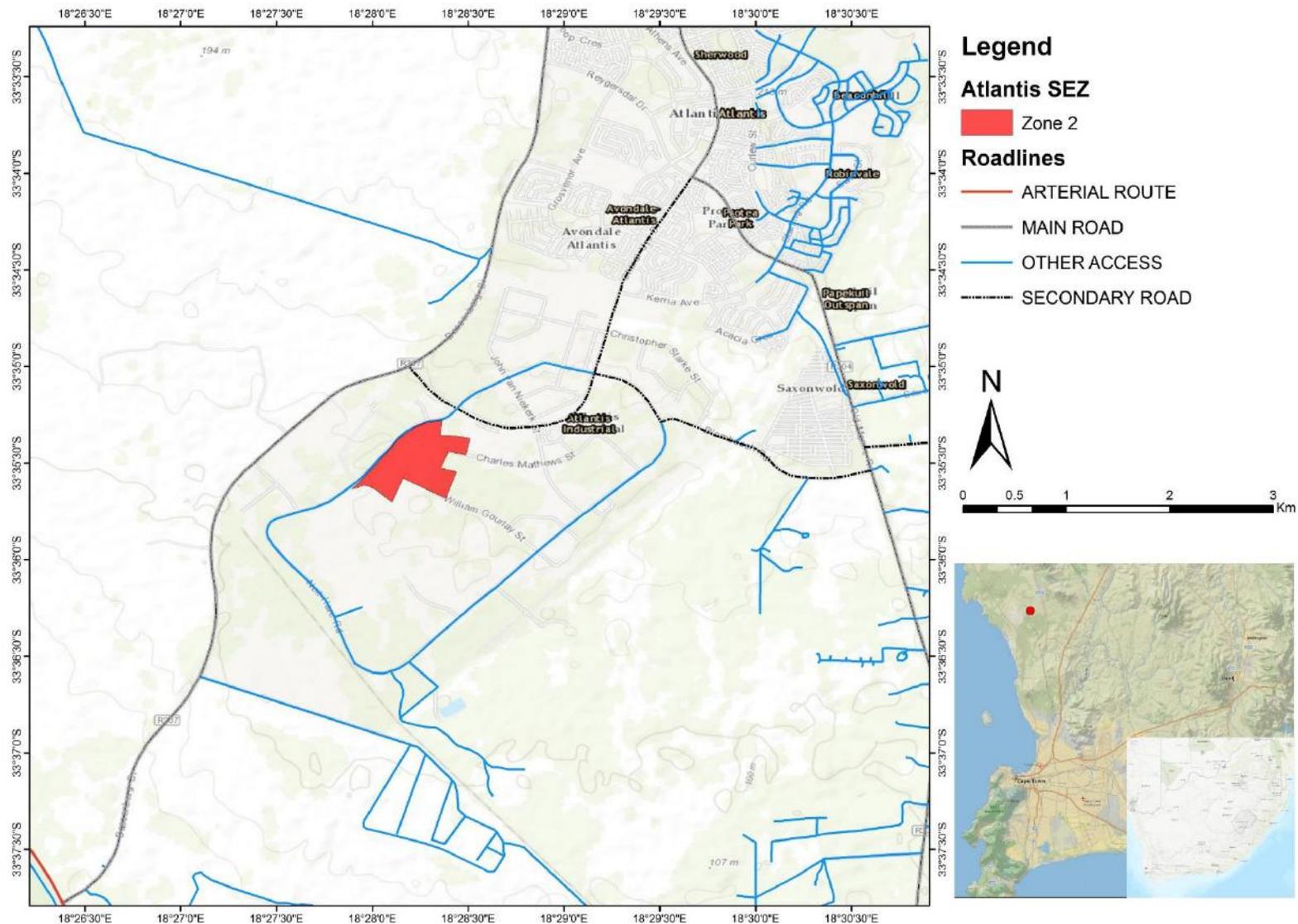


Figure 5.1: Locality of the proposed Atlantis GreenTech site (Zone 2)

Table 5.2: Potentially sensitive features considered for the preferred location of the Atlantis
GreenTech site.

Human infrastructure		Distance (km)
		Site
Community centre	Atlantis Thusong Service Centre	5.31
	Avondale Hall and Library	3.55
	Rebecca Van Amsterdam Hall	3.66
	Robinvale Hall	4.23
	Saxonsea Hall	5.76
	Saxonsea Minor Hall	5.74
Education	Atlantis Secondary School	3.87
	Avondale Primary School	3.31
	Berzelia Primary School	3.50
	Kerria Primary School	3.99
	Parkview Primary School	3.73
	Protea Park Primary School	4.07
	Proteus Secondary School	4.00
	Reygersdal Primary School	4.11
	Robinvale High School	4.84
	Saxonsea Primary School	5.20
	Wesfleur Primary School	3.46
Government	Department Of Home Affairs - Atlantis Service Point	4.49
	Department of Justice and Constitutional Development - Atlantis	4.34
Medical	Ampath Private Hospital - Atlantis Depot	4.53
	Atlantis Pharmacy	4.53
	G R Pharmaceuticals (1967)	1.95
	Medirite Pharmacy Atlantis	4.64
	Medirite Pharmacy Atlantis	4.64
	Protea Park Clinic - Atlantis	3.62
	Saxon Sea Clinic	5.19
	Town Centre Pharmacy	4.82
	Wesfleur Hospital	4.43
	Wesfleur Hospital Pharmacy	4.54
Wesfleur Private Clinic	4.53	
Other MIH	Ankerlig power station	1.25
Place of worship	New Apostolic Church-Cape - Atlantis - Avondale	3.31
	New Apostolic Church-Cape - Atlantis - Protea Park	3.69
	New Apostolic Church-Cape - Atlantis - Robinvale	4.48
	New Apostolic Church-Cape - Atlantis - Saxonsea	5.79
	Old Apostolic Church Of Africa - Atlantis - Avondale	3.59
	Old Apostolic Church Of Africa - Atlantis - Robinvale	4.08
Services	Atlantis fire station	2.15
	Atlantis SAPS Station	4.41
	Avbob - Atlantis	4.43
	Dassenberg Post Office	2.17
	Reygersdal Post Office	4.63
Sportsgrounds	Avondale Sports Field	3.18
	Protea Park Sports Field	3.23
	Robinvale Sports Complex	4.66
	Wesfleur Sports Complex	4.92
	Wesfleur swimming pool	4.82
Tourism	Blaauwberg Tourism Bureau - Robinvale	4.51

5.5.4 Preferred site alternative and site selection matrix

The preferred site location for the Atlantis GreenTech facility is Zone 2 (Figure 5.1). Zone 2's suitability over that of other Zone's has been determined in terms of the site selection requirements associated with GreenTech facilities and discussed above; namely: (i) key environmental attributes; (ii) spatial character; (iii) proximity to sensitive human structures (Table 5.2) and (iv) other significant feasibility factors. Sensitive features will be additionally identified through specialist investigations during the EIA phase to avoid impacts on sensitive features as far as possible. No other site alternatives will therefore be considered in the EIA Phase.

Table 5.3: Site selection matrix for determining the preferred location of the Atlantis GreenTech site.

Site considered	Key environmental attributes	Spatial character	Proximity to sensitive human structures	Other NB factors	Site selected (Y/N)
Zone 1	<ul style="list-style-type: none"> Endangered Cape Flats Dune Strandveld and Critically Endangered Atlantis Sand Fynbos. No CBAs on site Forms part of Atlantis Incentives Scheme for biodiversity offsetting 	<ul style="list-style-type: none"> Zoned for industrial use Located in area earmarked for future green technology hub 	Comparatively the Closest Zone to Sensitive human structures and features.	<ul style="list-style-type: none"> Several portions have been leased and utilized making not the entire site available. 	No
Zone 2	<ul style="list-style-type: none"> Endangered Cape Flats Dune Strandveld No CBAs on site Forms part of Atlantis Incentives Scheme for biodiversity offsetting 	<ul style="list-style-type: none"> Zoned for industrial use Located in area earmarked for future green technology hub 	Comparatively further away from sensitive human structures than other Zones	<ul style="list-style-type: none"> No EA Enough available land portions to constitute an appropriate site for the development 	Yes (preferred alternative)
Zone 3	<ul style="list-style-type: none"> Endangered Cape Flats Dune Strandveld and Critically Endangered Atlantis Sand Fynbos. No CBAs on site Artificial NFEPA wetland on site, Forms part of Atlantis Incentives Scheme for biodiversity offsetting 	<ul style="list-style-type: none"> Zoned for industrial use Has existing EA for gas-to-power. 	Furthest from sensitive human structures than other Zones	<ul style="list-style-type: none"> Existing EA for GreenTech AND gas-to-power. 	Not for this EIA process <u>(considered and approved as part of a previous EIA process)</u>
Zone 4	<ul style="list-style-type: none"> Critically Endangered Atlantis Sand Fynbos. No CBAs on site Forms part of Atlantis Incentives Scheme for biodiversity offsetting 	<ul style="list-style-type: none"> Zoned for industrial use Located in area earmarked for future green technology hub 	Comparatively also one of the closest Zones to Sensitive human structures and features.	<ul style="list-style-type: none"> Very small amount of land, not feasible for such a facility. Land already utilized. 	No

5.6 CONCLUDING STATEMENT ON PREFERRED ALTERNATIVES

As per Appendix 2, Section 2 (xi) of the 2014 EIA Regulations (as amended on 7 April 2017), details on the preferred alternative that will be taken forward into the EIA Phase are presented in **Table 5.3 and the sub-sections above**. Based on the aspects considered in this Chapter, the concluding statement of the preferred alternatives that will be considered in the EIA Phase is:

This EIA will assess the development of the proposed Atlantis GreenTech facility, manufacturing green technology, in the preferred location, **the Atlantis SEZ**, on the preferred site, namely Zone 2 (**Portion remainder of 277, 246, 254 and Portion remainder of 171**).

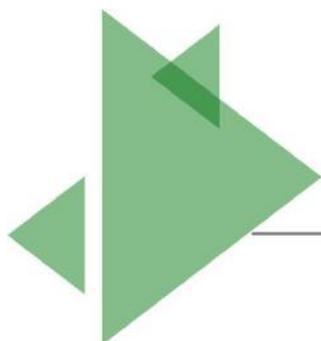
Scoping and Environmental Impact Assessment (EIA) for GreenTech in Zone 2
of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

DRAFT SCOPING REPORT



CHAPTER 6

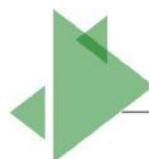
POTENTIAL ENVIRONMENTAL IMPACTS



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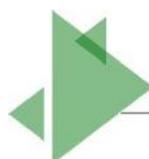
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6 POTENTIAL ENVIRONMENTAL RISKS AND IMPACTS

6.1 ASSESSMENT OF POTENTIAL IMPACTS (SCOPING LEVEL)

6.1.1 Method

A risk assessment approach was used to preliminarily assess (at a scoping level) the potential risks/impacts that the proposed development may impose on the receiving environment. Potential issues have been identified and assessed based on available information on generally expected impacts associated with GreenTech facilities. Information was sourced from existing information sources (refer to Table 7.6 in Chapter 7) as well as scoping-level inputs from specialists.

The risk assessment approach followed for this Scoping Phase incorporates internationally recognised methods from the Intergovernmental Panel on Climate Change (IPCC) (2014) assessment of the effects of climate change. The approach is based on an interpretation of existing information in relation to the proposed activity, to generate an integrated picture of the risks related to a specified activity in a given location, with and without mitigation. Risk is assessed for each significant stressor (e.g. physical disturbance), on each different type of receiving entity (e.g. the municipal capacity, a sensitive wetland), qualitatively (very low, low, moderate, high, very high) against a predefined set of criteria (Figure 6.1).

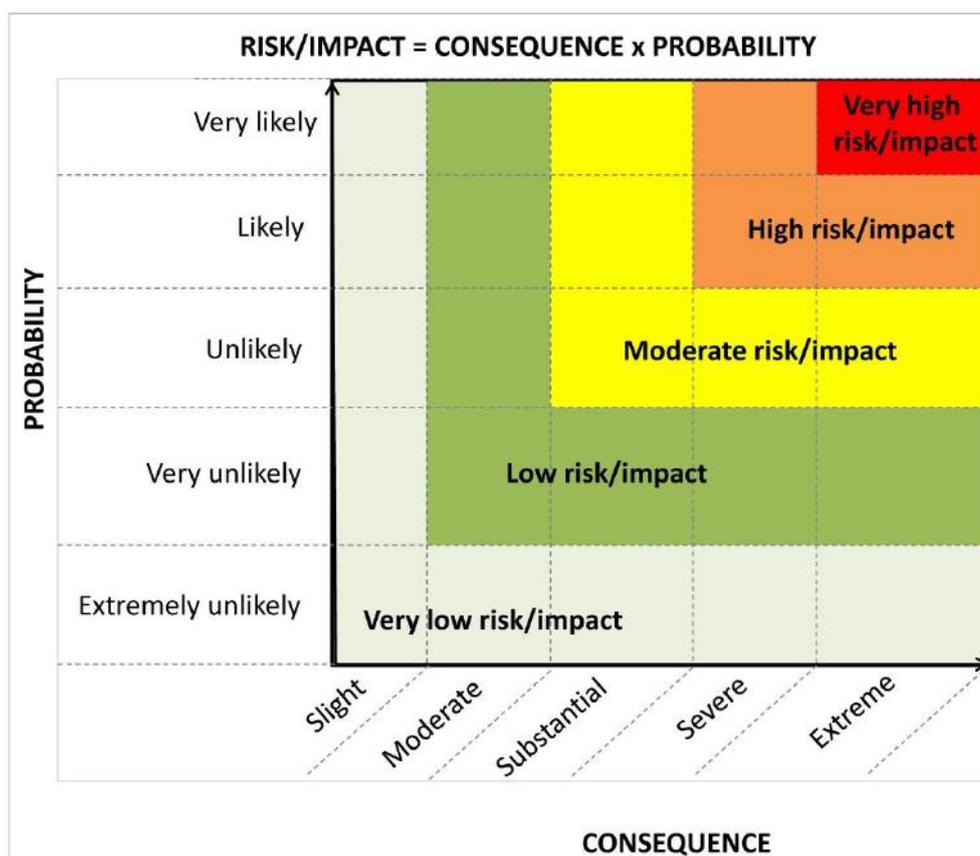


Figure 6.1: Guide to assessing risk/impact significance as a result of consequence and probability.

The following criteria have been considered in the assessment of risk/impacts of the location alternatives:

- **Status** - Whether the risk/impact on the overall environment will be:
 - Positive - environment overall will benefit from the impact; or
 - Negative - environment overall will be adversely affected by the impact.

- **Spatial extent** – The size of the area that will be affected by the risk/impact:
 - Site;
 - Local (<10 km from site);
 - Regional (<100 km of site);
 - National; or
 - International (e.g. Greenhouse Gas emissions or migrant birds).

- **Duration** – The timeframe during which the risk/impact will be experienced:
 - Very short term (instantaneous);
 - Short term (less than 1 year);
 - Medium term (1 to 10 years);
 - Long term (the impact will occur for the project duration); or
 - Permanent (mitigation will not occur in such a way or in such a time span that the impact can be considered transient (i.e. the impact will occur beyond the project decommissioning)).

- **Consequence** – The anticipated consequence of the risk/impact:
 - Slight;
 - Moderate;
 - Substantial;
 - Severe; and
 - Extreme.

- **Probability** – The probability of the impact occurring:
 - Very likely;
 - Likely;
 - Unlikely;
 - Very unlikely; and
 - Extremely unlikely.

- **Reversibility** of the Impacts - the extent to which the risks/impacts are reversible assuming that the project has reached the end of its life cycle (decommissioning phase):
 - Yes: High reversibility of impacts (impact is highly reversible at end of project life);
 - Partially: Moderate reversibility of impacts; or
 - No: Impacts are non-reversible (impact is permanent).

- **Irreplaceability** of Receiving Environment/Resource Loss caused by risk/impacts – the degree to which the impact causes irreplaceable loss of resources assuming that the project has reached the end of its life cycle (decommissioning phase):
 - High irreplaceability of resources (project will destroy unique resources that cannot be replaced);
 - Moderate irreplaceability of resources; or
 - Low irreplaceability of resources.

The **significance** of the risk/impact is then determined through a combination of the consequence and probability and is rated qualitatively as follows:

- Very low (the risk/impact may result in very minor alterations of the environment and can be easily avoided by implementing appropriate mitigation measures, and will not have an influence on decision-making);
- Low (the risk/impact may result in minor alterations of the environment and can be easily avoided by implementing appropriate mitigation measures, and will not have an influence on decision-making);
- Moderate (the risk/impact will result in moderate alteration of the environment and can be reduced or avoided by implementing the appropriate mitigation measures, and will only have an influence on the decision-making if not mitigated);
- High (the risk/impact will result in major alteration to the environment even with the implementation on the appropriate mitigation measures and will have an influence on decision-making); and
- Very high (the impact will result in very major alteration to the environment even with the implementation on the appropriate mitigation measures and will have an influence on decision-making (i.e. the project cannot be authorised unless major changes to the engineering design are carried out to reduce the significance rating)).

Please note that impacts with a positive status (e.g. employment opportunities and diversified economy) may also be indicated as having high or very high. In these cases high and very high ratings are desirable and indicate benefits to the particular receiving environment.

With the implementation of mitigation measures, the residual impacts/risks are **ranked** as follows in terms of significance:

- Very low = 5;
- Low = 4;
- Moderate = 3;
- High = 2; and
- Very high = 1.

6.1.2 Scoping-level impact assessment

Please note that this Scoping Phase impact assessment was conducted by the CSIR project team based on existing information (i.e. Table 7.6 in Chapter 7). The results of this high-level preliminary impact assessment will be verified by relevant specialists during the EIA Phase. Please see Chapter 7 for the EIA Plan of study (PoS) and Terms of Reference for a list of proposed specialist studies.

Potential impacts associated with the Atlantis GreenTech project are anticipated to mainly be of very low to moderate negative significance after mitigation, whilst some high positive socio-economic impacts may be expected (Table 6.1).

Table 6.1: Scoping level assessment of potential and residual risks/impacts, with high-level mitigation measures.

	Impact pathway	Nature of potential impact/risk	Status ¹	Phase where impact is most anticipated ²			Extent ³	Duration ⁴	Consequence	Probability	Significance of impact/risk = consequence x probability	Reversibility of impact	Irreplaceability of receiving environment/resource	Can impact be avoided?	Can impact be managed or mitigated?	Potential mitigation measures	Significance of residual risk/impact (after mitigation)	Ranking of impact/risk
				C	O&M	D												
Biophysical	Clearing of 32.6 ha of vegetation	Habitat and species loss	-	✓			Site	Long-term	Substantial	Very likely	High	Yes (biodiversity offset for the site in place)	Low (biodiversity offset for the site in place)	x	✓	Biodiversity offset for the site in place	Low	4
		Exposed soil susceptible to erosion	-	✓			Site	Medium-term	Moderate	Likely	Low	Yes (biodiversity offset for the site in place)	Low (biodiversity offset for the site in place)	x	✓	Erosion Management Plan (EMPr)	Very low	5
	Water runoff	Altered hydrological regimes and water quality	-	✓	✓	✓	Local	Permanent	Substantial	Likely	Low	Yes (rehab after decommissioning)	Low	x	✓	Storm Water Management Plan (EMPr)	Low	4
	Disturbance of soils	Alien plant invasions in disturbed areas	-	✓			Site	Long-term	Severe	Very likely	High	Yes (rehab after decommissioning)	Low (biodiversity offset for the site in place)	x	✓	Plant Search and Rescue (EMPr)	Low	4
	Spills, pollution	Contamination of Atlantis Aquifer	-	✓	✓	✓	Local/regional	Long-term	Severe	Likely	High	No	Low	✓	✓	Pollution management (EMPr)	Moderate	3
Social	Influx of people (jobseekers)	Disruption of social fabric (e.g. crime) and pressure on available services (e.g. housing)	-	✓	✓	✓	Regional	Short-term	Moderate	Very likely	Low	Yes	Low	x	✓	'Locals first' employment policy; Complaints register	Very low	5
	Labour required for project development and operation	Employment opportunities	+	✓	✓	✓	Regional	Short-term	Moderate	Likely	High (positive)	Yes	Low	x	✓	'Locals first' employment policy considering the skills are adequate	High (positive)	2 (positive)
Air Quality	Air Quality disturbance due to emissions	Decrease in the quality of the air	-		✓		Local & regional	Long-term	Substantial	Likely	Low	No	High	x	✓	Keep within regulated acceptable emissions standards & consider cumulative impacts	Low	4
Economic	Project expenditure (incl. direct capital investment, and compulsory social investment)	Investment and growth in local economy	+	✓	✓	✓	Regional	Long-term	Severe	Very likely	High (positive)	Yes	Moderate	x	✓	None	High (positive)	2 (positive)
	Development of the proposed project	Decreased property values	-	✓	✓	✓	Regional	Long-term	Slight	Unlikely	Very low	Yes	High	✓	✓	Proper construction and management; minimise other potential impacts (e.g. tourism)	Very low	5
	Buffer Zone around development	Land Sterilization	-	✓	✓		Local	Long term (while facility is operational)	Slight	Very likely	Very low	Yes	Low	x	x	Neighbouring properties consist mostly of industry & the area is zoned general Industrial (GI)	Very low	5
Noise	Noise disturbance during construction, operation and decommissioning	Disruption of noise levels	-	✓	✓	✓	Local	Long-term	Severe	Likely	Moderate	No	High	x	✓	Adaptive project design to avoid excessive noise disturbance, keep within GI zoning regulations	Moderate	3
Heritage	Development of the proposed facility causing damage to or	Destruction of heritage resources (also palaeontology, archaeology and built	-	✓			Local	Permanent	Severe	Unlikely	Low	Partially	Low	x	✓	Adaptive project design to avoid heritage resources (if applicable)	Low	4

¹ Status: Positive (+); Negative (-)

² Construction (C); Operation and Maintenance (O&M); Decommissioning (D)

³ Site; Local (<10 km); Regional (<100); National; International

⁴ Very short-term (instantaneous); Short-term (<1yr); Medium-term (1-10 yrs); Long-term (project duration); Permanent (beyond project decommissioning)

	Impact pathway	Nature of potential impact/risk	Status ¹	Phase where impact is most anticipated ²			Extent ³	Duration ⁴	Consequence	Probability	Significance of impact/risk = consequence x probability	Reversibility of impact	Irreplaceability of receiving environment/resource	Can impact be avoided?	Can impact be managed or mitigated?	Potential mitigation measures	Significance of residual risk/impact (after mitigation)	Ranking of impact/risk
				C	O&M	D												
	impact on potential heritage resources	environment)																
Visual	Visual intrusion of the project during construction, operation and decommissioning	Transformed visual landscape	-	✓	✓		Regional	Long-term	Moderate	Very likely	Low	Yes (General Industrial area)	Low	x	x	Maintain appearance of physical structures	Low	4
Traffic	Increased traffic and abnormal loads causing congestion to the road network	Pressure on the road network	-	✓	✓	✓	Local	Short term	Moderate	Very Likely	Moderate	Yes	Low	x	✓	Traffic Management Plan	Moderate	3
Risk Factors	Explosions, leakages, poisoning etc. during all phases of the project	Gas accidents	-	✓	✓	✓	Local & Regional	Permanent	Severe	Unlikely (proper maintenance)	Moderate	No	Low	x	✓	Routine maintenance, safety measure, good technology (EMPr)	Low	4
Climate Change	Increase in harmful emissions and Greenhouse gases into the atmosphere	Air emissions	-	✓	✓	✓	local, regional and national (cumulative)	Permanent	Severe	Unlikely	Low	No	Low	x	✓	Ensure emission levels are managed and the air quality of the Atlantis area is acceptable to human and ecological health	Low	4
CUMULATIVE IMPACTS																		
Air emissions	Decrease in ambient air quality	Release of air emissions	-		✓		local, regional and national	Long term	Moderate	Likely	Low	No	Moderate	x	✓	Ensure air emission levels take into account nearby facilities and are managed to acceptable levels	Low	4
Vegetation type loss	Clearing of vegetation and loss of particular species in the region	Loss of species	-	✓			Local and regional	Permanent	Moderate	Very likely	Moderate	Yes (biodiversity offset in place)	Moderate (biodiversity offset in place)	x	✓	Offset has been implemented for the whole Atlantis area which takes into account the cumulative loss of species	Low	4
Visual disturbance	Construction of a GreenTech facility	Disturbance of the visual landscape	-	✓	✓		Local	Long term	Low	Very likely	Low	Yes	Moderate	x	x	The Atlantis Industrial area is heavily transformed and the facility is not in view of the local residents.	Low	4
Noise Disturbance	Construction and operation of a GreenTech facility	Increase in noise levels	-	✓	✓	✓	Local	Long-term	Low	Very Likely	Low	Yes	Moderate	x	✓	Noise levels must be kept to acceptable standards taking into consideration the nearby facilities and their noise levels.	Low	4
Job creation	Construction and operation of a GreenTech facility	Increase in jobs	✓	✓	✓	✓	Local, regional and potentially national/international	Short-long term	High (positive)	Likely	High (Positive)	Yes	Low	x	✓	This facility will add to employment creation in the area which is socio-economically challenged.	High (positive)	2 (positive)

6.1.3 Results of the DEA Screening Report

The DEA screening tool was used as a scoping methodology to provide sensitivities and suggest potential specialist studies to be conducted for the EIA. It must be noted that the tool is merely a **recommendation** on which potentially sensitive features (and corresponding specialist studies) may occur on site without any prior or background knowledge/ground-truthing of the site. The table below is an excerpt from the Screening Report (full report attached as **Appendix F**) on the recommended specialist studies and the reasons for including or not including said studies, as well as the sensitivities indicated by the report on a scale of very high to low:

STUDY SUGGESTED BY SCREENING TOOL	INCLUDED/REASONS FOR EXCLUSION
Landscape/Visual Impact Assessment	Due to the nature of the location of the site (Zone 2 of the Atlantis SEZ which was gazetted as a designated Special Economic Zone on 19 October 2018, Government Gazette 41982, Regulation No. 1130), the visual landscape in the area has been radically transformed to date. The site is surrounded by heavy industry (i.e. neighboring Ankerlig power station and Atlantis Foundries) and will not pose significant impacts to sensitive visual receptors. Please refer to Chapters 3 and 5 for an indication of the distance of the proposed project to sensitive receptors, as well as its location in the landscape. The SEZ has been designated in order to ensure that heavy industry is segregated from settlements in a confined zone/area, which will minimize several impacts, such as visual intrusion. In addition, the site is zoned General Industrial, and this activity is suited and intended for a site of such zoning. It must be noted, however, that management of visual impacts and mitigation measures (in the EMPr) will still be included in the EIA phase.
Archaeological and Cultural Heritage Impact Assessment	A heritage assessment is being conducted (Refer to Chapter 7 for ToR's). The findings will form part of the EIA reports.
Palaeontology Impact Assessment	A paleontological assessment is being conducted (Refer to Chapter 7 for the ToR's). The findings will form part of the EIA reports.
Terrestrial Biodiversity Impact Assessment	A terrestrial biodiversity assessment is being conducted (Refer to Chapter 7 for ToR's and

	Appendix F for information on the incentives scheme and offsetting). The findings will form part of the EIA reports.
Aquatic Biodiversity Impact Assessment	As there are no water features present on site, an aquatic biodiversity assessment is deemed unnecessary. In addition, this was deemed low sensitivity in the screening tool (refer to excerpt below).
Avian Impact Assessment	Due to the nature of the location of the site (Zone 2 of the Atlantis SEZ which was gazetted as a designated Special Economic Zone on 19 October 2018, Government Gazette 41982, Regulation No. 1130), aviation concerns are not deemed to be feasible at this stage of the EIA process, as exact siting, footprints and technologies are not known. In addition, the neighboring activities (i.e. the Ankerlig Power Station as well as the Atlantis Foundries, amongst others), have already deemed the area non-feasible for civil aviation. It must be noted, however, that mitigation measures (in the EMPr) will still be included in the EIA phase.
Socio-Economic Assessment	As noted in Chapter 7, a plethora of socio-economic studies for the SEZ have already been conducted. This existing information will be used (Table 7.6) to inform the socio-economic impacts in the EIA phase. Previous studies have shown development in the SEZ as a positive socio-economic impact due to the high levels of poverty in the area. Thus, a new socio-economic impact assessment is deemed resource-wasteful and not necessary for this project. It must be noted, however, that management of social impacts and mitigation measures (in the EMPr) will still be included in the EIA phase.

Proposed Development Area Environmental Sensitivity

The following summary of the development site environmental sensitivities is identified. Only the highest environmental sensitivity is indicated. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme		X		
Aquatic Biodiversity Theme				X
Archaeological and Cultural			X	

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Heritage Theme				
Civil Aviation Theme		X		
Defence Theme				X
Terrestrial Biodiversity Theme	X			

6.2 IMPACTS TO BE ASSESSED IN THE EIA PHASE

The issues and impacts presented in this chapter have been identified via the environmental *status quo* of the receiving environment (environmental, social and heritage features present on site), an assessment of the extensive existing information sources for the Atlantis SEZ, a review of environmental impacts from other similar GreenTech projects, and input from specialists that form part of the project team. Potential environmental risks/impacts will be confirmed during the EIA phase. The main potential risks/impacts that the proposed GreenTech development may pose to the receiving environmental and socio-economic environment are discussed below⁵.

Impacts and issues to be addressed in the specialist studies are described below. This is based on a reasonable amount of information available (due to Atlantis being an industrial and heavily transformed area) to specialists prior to their specialist studies. These issues will be expanded upon and studied in greater detail in the EIA phase.

⁵ The list of assessments described in this section pertains to the specialist studies that will be conducted as per Chapter 8 of this report. Other impacts relating to the project (i.e. noise, visual, social etc.) will be assessed using the extensive amount of information available for the Atlantis SEZ. This will be expanded upon and assessed in the EIA phase

6.2.1 Terrestrial Ecology

6.2.1.1 Key Issues

The proposed development will result in a number of actions that will arise in both the construction and operation phases of the project and include *inter alia*:

- Possible levelling of topographic features;
- Clearance of approximately 32.6 ha of vegetation;
- Establishment of warehouse-like structures;
- Fencing of the site;
- Other supportive infrastructure.

The construction phase is a relatively short term undertaking, although “intensive” in terms of the rapid physical changes that arise on site. Given this, it is expected that the following impacts of an ecological nature may arise during the construction and operational phases.

Construction Phase

The proposed GreenTech development would impact on one vegetation types, which includes a large portion of ENDANGERED, good quality Cape Flats Dune Strandveld.

The transitional area - where the soil interface gives rise to a changeover and interchange of species between the vegetation types is of high conservation importance since such ecotones usually drive speciation and are important in terms of ecological processes.

The large portion of Cape Flats Dune Strandveld (population of *Leucospermum parile* found on the neighboring site) is of high conservation importance. However, these occur within an area overtaken by alien vegetation and with limited connectivity to the Atlantis dune area. Restoration, although possible, is unlikely to occur in the near future, which means that the land will undergo further degradation through alien invasion. In order for the land to hold any conservation value in the future, the alien vegetation would have to be eradicated and biodiversity corridors created to link with the Atlantis dune area.

The Atlantis Industrial Incentives Scheme (Appendix F) is supported by the specialist since this would ensure the conservation of an unfragmented area greater than the existing site that will be lost and it would become a well-managed conservation area. Thus although the impacts would be HIGH NEGATIVE these would more than adequately compensate in the offset scenario which could be a gain for biodiversity conservation.

Operational Phase

- Alteration of ecological processes on account of the exclusion of certain species inherent to the functional state of land within the facility generally leading to possible variations in populations of other species that remain within the site, with concomitant ecological change;
- The fencing of the site, possibly with electric fencing, is likely to impact upon faunal behaviour, leading to the exclusion of certain species and possible mortalities.

6.2.1.2 Atlantis Industrial Incentive Scheme and Land Banking

As noted in Chapter 3, Section 3.3.9, the proposed GreenTech facility forms part of the land banking mechanism as part of the Atlantis Industrial Incentives Scheme. The land banking component is one of these incentives that aim to attract development to the Atlantis area. To date, 14 properties have been purchased totalling 940 hectares in order to compensate for the potential loss of indigenous vegetation within the Atlantis Industrial

area. A biodiversity off-set in accordance with the Land Bank of the Atlantis Industrial incentive Scheme is thus being proposed to the Competent Authority. As such, it is proposed that an offset ratio of 1:1 is applied in order to mitigate for the loss of this significant area of Cape Flats Dune Strandveld. In addition to the proposed utilization of the Atlantis industrial incentive Scheme at a ratio of 1:1, certain conditions will form part of the EMP in the EIA phase, as required. **Refer to Appendix F: "Other Information", for a full description of the Atlantis Industrial Incentives scheme and how it related to biodiversity loss in this context.**

The Botanical specialist assessment will take this information into account in the impact assessment, noting that the proposed offset is a gain for biodiversity conservation since this would ensure the conservation of an unfragmented area **greater than the existing site** that will be lost and it would become a well-managed conservation area. Thus although the impacts would be high, these would more than adequately compensate in the offset scenario.

6.2.1.3 Assessment to be undertaken during the EIA Phase

An Ecological Impact Assessment will be undertaken during the EIA Phase, which will include a site investigation. The findings of the assessment will be utilised to identify the most appropriate location of the project within the development footprint, and any significant or fatal flaws that may arise within the particular development footprint.

6.2.2 Paleontology

6.2.2.1 Key Issues

A review of published sources and personal observations indicates that the proposed development falls on land under which deposits of potential palaeontological significance may exist. The area is within the Duinefontyn Dune Plume where wind erosion has in other parts exposed deeper sediments that underlie the Holocene (<10 000 year old (10 ka) Witzand Formation. Vegetation comprises a mix of indigenous Strandveld and alien Acacia species. Absolute dates place some fossil material at 330 ka, but there are even older known marine fossiliferous deposits dating back to at least 5 Ma (Million years ago) at the coast. Sparse scatters of stone artefacts of probable Early Stone Age occur with some of the fossils; Middle and Later Stone Age artefacts also occur, the latter on or within the Witzand Formation and most likely the result of activities of Khoekhoe herders, who arrived in the Western Cape some 2000 years ago. Similar occurrences may have been located during the archaeological survey of the proposed area.

Collaboration between the contractor and a suitably-qualified palaeontologist (or archaeologist with appropriate experience) will be required during excavations for foundations and infrastructure so that information and/or material can be recorded appropriately. Prior access to geotechnical information and accurate foundation depths would help to determine the likelihood of this and the best strategy. Provided that the recommendations of this assessment are complied with, there is no palaeontological reason why the erection of the proposed development should not proceed. The recommendations from the specialist are as follows:

- Excavations for foundations/infrastructure should be monitored by an appropriate palaeontologist. The frequency of this to be worked out a priori with the contractor to minimize time spent on site.
- If possible, geotechnical information, together with the proposed depths of excavations for foundations and/or infrastructure, should be provided prior to the commencement of construction. This may enable a better estimation of the time(s) when monitoring will take place and even the extent of recovery work.
- Protocols for dealing with palaeontological monitoring/mitigation must be included in the Environmental Management Plan (EMP). Any such material is likely to be fragile and due care must be exercised.
- Any material recovered will be lodged in the collections of Iziko South African Museum.

6.2.2.2 Assessment to be undertaken during the EIA Phase

From the above, it is clear that the proposed development is in an area under which potentially important palaeontological remains may occur. Such palaeontological remains are likely to be rare and sparsely distributed but, if encountered, must be carefully exposed and recorded by an appropriately qualified person. Due to the paleontological sensitivity of the area, a desktop Paleontological Heritage Assessment will be undertaken during the EIA Phase and it will include recommendations for inclusion in the EMPr.

6.2.3 Heritage

6.2.3.1 Key Issues

Significant impacts to heritage resources are likely to be limited to archaeological resources and may be easily avoided by the final layout. Surface archaeological sites in Bushmanland tend to be very easy to record and sample and, as such, mitigation could be very easily effected should this be required. The terrain is largely flat and there are a number of dune fields. Where agriculture is not taking place, alien plant species have taken over. Previous archaeological surveys have described the poor visibility due to dense ground cover of alien vegetation. A large number of Heritage and Archaeological Impact Assessments have been conducted in this area, including a survey by Hart *et al.* (2007) which also covered the two sites identified for the current development. He reported that no significant archaeological material was recovered.

A literature survey of the Atlantis area strongly suggests that the likelihood of uncovering any significant archaeological remains on the site which is proposed for the GreenTech development are minimal. Prior surveys have been conducted on the neighboring properties which has been identified for the current proposed GreenTech development. No significant archaeological remains were reported. However, human remains can occur anywhere on the landscape. In the event that human remains are uncovered, certain protocols must be observed. The area around the burial should be cordoned off and both Heritage Western Cape and the police must be notified. No further construction should take place until the authorities have investigated the remains and made their recommendations.

Key issues during the construction and operational phases are:

- Direct disturbance and/or destruction of archaeological material;
- Direct impacts to the landscape through introduction of industrial type facilities; and
- Direct disturbance and/or destruction of possible heritage features or graves.

6.2.3.2 Assessment to be undertaken during the EIA Phase

A Heritage Impact Assessment will be during the EIA Phase, which will include an assessment of the potential impacts associated with the proposed development on the heritage features present on site and the mitigation measures to be implemented to adequately protect these heritage features. An **NID is also being submitted to Heritage Western Cape** by the specialist and this will be included in the EIA reports.

6.2.4 Traffic

6.2.4.1 Key Issues

The purpose of the Traffic Impact Study is to investigate the traffic impact of the proposed development on the surrounding road network and to propose mitigating measures if required. At the time of this Report there are no known planned changes to the existing road infrastructure in the study area that will have an effect on the future development. There are also no planned road links in the study area that will have an impact on trip distribution or traffic volumes in the study area. No known latent rights exist within the immediate study area

that will have an impact on the local intersection performance, which indicates a low cumulative impact. The trip generation for a large industrial site of ±33ha to which a typical trip rate per 100 square metre Gross Leasable Area (GLA) is calculated indicates there will be traffic impacts associated with this proposed development. Impacts expected to arise in the phases of the project as described below:

Construction and Decommissioning Phase

- Increase in vehicles coming to site (increase in traffic) to transport various components of the development to site including an increase in noise, dust and exhaust emissions.
- Increase in vehicles coming to site to transport workers and contractors to site including an increase in noise, dust and exhaust emissions.
- Increase in vehicles coming to site (increase in traffic) from during the construction phase to transport various components of the development to site including an increase in noise, dust and exhaust emissions.

Operational Phase

- Increase in vehicles coming to site to transport permanent employees to site including an increase in noise, dust and exhaust emissions.
- Increase in trucks carrying abnormal heavy loads from site causing increased congestion, traffic, noise dust and exhaust emissions and pressure on the road network.

6.2.4.2 Assessment to be undertaken during the EIA Phase

Due to the industrial nature of the site and the surrounding area, the traffic volumes contributed by the construction and operation phases of the facility on the existing traffic volumes and road network are considered acceptable, with mitigation. A Traffic Impact Statement will be undertaken during the EIA Phase and it will include road maintenance measures and other traffic management measures within the EMPr.

6.2.5 Cumulative Impacts

The cumulative impacts will be assessed by identifying other applicable projects, such as manufacturing facilities and other industrial developments in the local Atlantis SEZ area. In terms of cumulative impacts, the fact that the Atlantis SEZ is heavily transformed and demarcated for future industrial development has resulted in the City of Cape Town Municipality, DEA&DP and other organs of state such as CapeNature, finding ways in which these impacts can be managed and/or offset. The proximity of the proposed Atlantis GreenTech facility to Ankerlig and future potential gas import infrastructure means that the impacts can be concentrated to the Atlantis Industrial area. This is why the Atlantis Industrial Incentives Scheme has been put into place, which highlights the need for responsible development and offsetting of endangered vegetation (more information on the scheme in **Appendix F**). However it is still important to promote sustainable and environmentally responsible development, which is why cumulative impacts for this development will be more thoroughly assessed in the EIA phase.

At a scoping phase level, cumulative effects associated with these similar types of projects include inter alia:

- Traffic generation;
- Habitat destruction and fragmentation;
- Removal of vegetation;
- Increase in air emissions and decrease in overall regional air quality;
- Increased contribution to climate change;
- Increase in noise disturbance;
- Increase in visual disturbance to sensitive receptors
- Increase in stormwater run-off and erosion;

- Job creation;
- Social upliftment; and
- Contribution of resources to the local renewable energy sector.

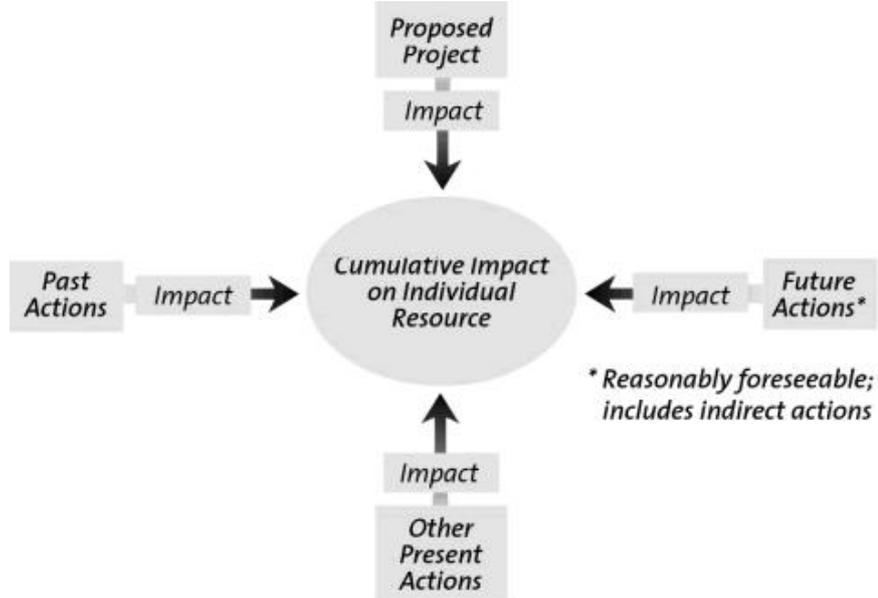


Figure 6.2: Schematic Diagram for the assessment of Cumulative Impacts

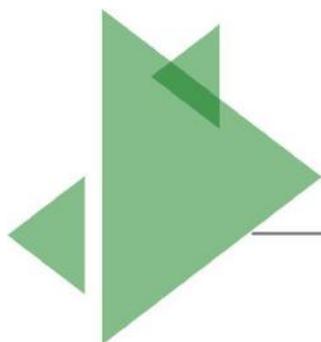
Scoping and Environmental Impact Assessment (EIA) for GreenTech in Zone 2
of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

DRAFT SCOPING REPORT



CHAPTER 7

PLAN OF STUDY FOR EIA



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7 PLAN OF STUDY FOR EIA

This chapter presents the Plan of Study for the EIA (PSEIA), which sets out the process to be followed in the EIA Phase (as required by the 2014 EIA Regulations, as amended). The PSEIA is based on the outcomes of the Scoping Phase (to date) and provides the Terms of Reference (TOR) for the specialist studies that have been identified, the alternatives that will be considered and assessed, as well as the PPP that will be undertaken during the EIA Phase.

7.1 PURPOSE OF EIA AND REQUIREMENTS OF THE 2014 EIA REGULATIONS

The purpose of the EIA Phase is to:

- Address issues that have been identified through the Scoping Process;
- Assess alternatives to the proposed activity in a comparative manner;
- Assess all identified impacts and determine the significance of each impact; and
- Recommend actions to avoid/mitigate negative impacts and enhance benefits.

The EIA Phase consists of three parallel and overlapping processes:

- Central assessment process through which inputs are integrated and presented in an EIA Report that is submitted for approval to the DEA and other commenting authorities
- Undertaking of a PPP whereby findings of the EIA Phase are communicated and discussed with I&APs and responses are documented
- Undertaking of specialist studies that provide additional information/assessments required to address the issues raised in the Scoping Phase

Table 7.1 below shows the requirements for the PSEIA in accordance with Appendix 2 (2) (i) of the 2014 EIA Regulations (as amended on 7 April 2017).

Table 7.1: Requirements for Plan of Study for EIA in accordance with the 2014 EIA Regulations (as amended on 7 April 2017)

Section of the EIA Regulations: Appendix 2 (2) (i)	Requirements for a Scoping Report in terms of Appendix 2 of the 2014 NEMA EIA Regulations (GN R982)	Location in this Chapter
i.	A plan of study for undertaking the EIA process to be undertaken, including - <ul style="list-style-type: none"> ▪ a description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity; 	Section 7.6
ii.	<ul style="list-style-type: none"> ▪ a description of the aspects to be assessed as part of the environmental impact assessment process; 	Section 7.5
iii.	<ul style="list-style-type: none"> ▪ aspects to be assessed by specialists; 	Section 7.5
iv.	<ul style="list-style-type: none"> ▪ a description of the proposed method of assessing the environmental aspects, including a description of the proposed method of assessing the environmental aspects including aspects to be assessed by specialists; 	Section 7.4
v.	<ul style="list-style-type: none"> ▪ a description of the proposed method of assessing duration and significance; 	Section 7.4
vi.	<ul style="list-style-type: none"> ▪ an indication of the stages at which the competent authority will be consulted; 	Section 7.3 and Section 7.4
vii.	<ul style="list-style-type: none"> ▪ particulars of the public participation process that will be 	Section 7.3 and Section 7.4

Section of the EIA Regulations: Appendix 2 (2) (i)	Requirements for a Scoping Report in terms of Appendix 2 of the 2014 NEMA EIA Regulations (GN R982)	Location in this Chapter
	conducted during the environmental impact assessment process;	
viii.	<ul style="list-style-type: none"> ▪ a description of the tasks that will be undertaken as part of the environmental impact assessment process; and 	Section 7.2, Section 7.3 and Section 7.4
ix.	<ul style="list-style-type: none"> ▪ 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. 	Section 7.4

7.2 OVERVIEW OF APPROACH TO PREPARING THE EIA REPORT AND EMPR

The results of the specialist studies and other relevant project information for the Atlantis GreenTech project will be summarised and integrated into the EIA Report. The Draft EIA Report will be released for a 30-day I&AP and authority review period, as outlined in Sections 7.3 and 7.4 of this chapter. All registered I&APs on the project database will be notified in writing of the release of the Draft EIA Report for review. Should it be deemed necessary (based on feedback on the Scoping Process), one public meeting can be arranged during this review period, or following requests from stakeholders, several focus group meetings with key I&APs and stakeholders can instead be arranged. The purpose of these meetings (if deemed necessary) will be to provide an overview of the outcome and recommendations from the specialist studies, as well as provide opportunity for comment. Comments raised, through written correspondence (emails, comments, forms) and at meetings (public meeting and/or focus group meetings) will be captured in a Comments and Responses Trail for inclusion in the EIA Reports that will be submitted to the DEA&DP for decision-making in terms of Regulation 23 (1) (a) of the 2014 EIA Regulations (as amended). Comments raised will be responded to by the EIA team and/or the applicant. These responses will indicate how the issue has been dealt with in the EIA Process. Should the comment received fall beyond the scope of this EIA, clear reasoning will be provided. All comments received (and the associated responses from the EIA team) will be attached as an appendix to the EIA Report for submission to the DEA&DP.

The EIA Report will include an EMP, which will be prepared in compliance with the relevant regulations (i.e. Appendix 4 of the 2014 EIA Regulations, as amended). This EMP will be based broadly on the environmental management philosophy presented in the ISO 14001 standard, which embodies an approach of continual improvement. Actions in the EMP will be drawn primarily from the management actions in the specialist studies for the construction and operational phases of the project. If the project components are decommissioned or re-developed, this will need to be done in accordance with the relevant environmental standards and clean-up/remediation requirements applicable at the time.

7.3 PUBLIC PARTICIPATION PROCESS

The key steps in the PPP for the **EIA Phase** are described below. This approach will be confirmed with the provincial and national environmental authorities through their review of the PoS (i.e. this chapter).

TASK 1: I&AP REVIEW OF THE DRAFT EIA REPORT AND EMPR

The first stage in the process will entail the release of the Draft EIA Report for a 30-day I&AP and stakeholder review period. Relevant organs of state and I&APs will be informed of the review process in the following manner:

- Placement of one English advertisement in The Cape Times newspaper and one Afrikaans advertisement in Die Burger to notify potential I&APs of the availability of the EIA Reports;
- A letter will be sent via registered mail and email to all registered I&APs and organs of state (where postal, physical and email addresses are available) on the database. The letter will include notification

of the 30-day comment period for the Draft EIA Report, as well as an invitation to attend the public meeting and/or focus group meetings, if required.

- A public meeting could possibly be held during the review of the Draft EIA Report, if warranted, and if there is substantial public interest during the EIA Phase. Furthermore, telephonic consultations with key I&APs will take place, upon request; and
- Meeting(s) with key authorities involved in decision-making for this EIA (if required and requested).

The Draft EIA Report will be made available and distributed through the following mechanisms to ensure access to information on the project and to communicate the outcome of specialist studies:

- Copies of the report will be placed at the local library (i.e. Avondale Public Library) for I&APs to access for viewing;
- Key authorities will be provided with either a hard copy and/or CD of the Draft EIA Report;
- The Draft EIA Report will be uploaded to the project website (<https://www.csir.co.za/environmental-impact-assessment>) and
- Telephonic consultations will be held with key I&AP and organs of state groups, as necessary.

TASK 2: COMMENTS AND RESPONSES TRAIL

A key component of the EIA Process is documenting and responding to the comments received from I&APs and the authorities. The following comments on the Draft EIA Report will be documented:

- Written and emailed comments (e.g. letters and completed comment and registration forms);
- Comments made at public meetings and/or focus group meetings (if required);
- Telephonic communication with CSIR project team; and
- One-on-one meetings with key authorities and/or I&APs (if required).

The comments received during the 30-day review of the Draft EIA Report will be compiled into a Comments and Responses Trail for inclusion in an appendix to the Draft EIA Report that will be submitted to the DEA&DP in terms of Regulation 23 (1) (a) for decision-making. The Comments and Responses Trail will indicate the nature of the comment, as well as when and who raised the comment. The comments received will be considered by the EIA team and appropriate responses provided by the relevant member of the team and/or specialist. The response provided will indicate how the comment received has been considered in the EIA Reports for submission to the DEA&DP and in the project design or EMPRs.

TASK 3: COMPILATION OF FINAL EIA REPORT FOR SUBMISSION TO THE DEA

Following the 30-day commenting period of the Draft EIA Report and incorporation of the comments received into the reports, the Final EIA Report (i.e. hard copies and electronic copies) will be submitted to the DEA&DP for decision-making in line with Regulation 23 (1) of the 2014 EIA Regulations, as amended. In line with best practice, I&APs on the project database will be notified via email (where email addresses are available) of the submission of the Final EIA Report to the DEA&DP for decision-making.

The Final EIA Report that is submitted for decision-making will also include proof of the PPP that was undertaken to inform organs of state and I&APs of the availability of the Draft EIA Report for the 30 day review (during Task 1, as explained above). The DEA&DP will have 107 days (from receipt of the Final EIA Report) to either grant or refuse EA (in line with Regulation 24 (1) of the 2014 EIA Regulations, as amended).

TASK 4: EA AND APPEAL PERIOD

Subsequent to the decision-making phase, if an EA is granted by the DEA&DP for the proposed project, all registered I&APs and stakeholders on the project database will receive notification of the issuing of the EA and the appeal period. The 2014 EIA Regulations (as amended on 7 April 2017) (i.e. Regulation 4 (1)) states that after the Competent Authority has reached a decision, it must inform the Applicant of the decision, in writing, within

5 days of such decision. Regulation 4 (2) of the EIA Regulations stipulates that I&APs need to be informed of the EA and associated appeal period within 14 days of the date of the decision. All registered I&APs will be informed of the outcome of the EA and the appeal procedure and its respective timelines.

The following process will be followed for the distribution of the EA (should such authorisation be granted by the DEA&DP) and notification of the appeal period:

- Placement of one English advertisement and one Afrikaans advertisement in local Newspapers to notify I&APs of the EA and associated appeal process;
- A letter will be sent via registered mail and email to all registered I&APs and organs of state (where postal, physical and email addresses are available) on the database. The letter will include information on the appeal period, as well as details regarding where to obtain a copy of the EA;
- A copy of the EA will be uploaded to the project website(<https://www.csir.co.za/environmental-impact-assessment>) and
- All I&APs on the project database will be notified of the outcome of the appeal period in writing.

Authority Consultation during the EIA Phase

Authority consultation is integrated into the PPP, with additional one-on-one meetings held with the lead authorities, where necessary. It is proposed that the Competent Authority (DEA&DP) as well as other lead authorities will be consulted at various stages during the EIA Process. At this stage, the following authorities have been identified for the purpose of this EIA Process (additional authorities might be added to this list as the EIA Process proceeds):

- National DEA;
- Department of Environmental Affairs and Development Planning Western Cape Province;
- DWS of the Western Cape Province;
- Department of Energy of the Western Cape Province;
- Eskom Holdings SOC Ltd;
- Transnet SOC Ltd;
- South African National Parks;
- National Energy Regulator of South Africa;
- National DAFF;
- DAFF of the Western Cape Province;
- Department of Agriculture, Land Reform & Rural Development of the Western Cape Province;
- Department of Public Works, Roads and Transport of the Western Cape Province;
- Department of Labour;
- SAHRA;
- South African National Road Agency Limited;
- City of Cape Town Metropolitan Municipality

The authority consultation process for the EIA Phase is outlined in Table 7.2 below.

Table 7.2: Authority Communication Schedule

STAGE IN EIA PHASE	FORM OF CONSULTATION
During the EIA Process	Site visit for authorities, if required.
During preparation of EIA Reports	Communication with the DEA&DP on the outcome of Specialist Studies.
On submission of Final EIA Report for decision-making	Meetings with dedicated departments, if requested by the DEA&DP, with jurisdiction over particular aspects of the project (e.g. Local Authority) and potentially including relevant specialists.

7.4 APPROACH TO IMPACT ASSESSMENT AND SPECIALIST STUDIES

This section outlines the assessment methodology and legal context for specialist studies, as recommended by the DEA 2006 Guideline on Assessment of Impacts.

7.4.1 Generic TOR for the Assessment of Potential Impacts

The identification of potential impacts should include impacts that may occur during the construction, operational and decommissioning phases of the development. The assessment of impacts is to include direct, indirect as well as cumulative impacts. In order to identify potential impacts (both positive and negative) it is important that the nature of the proposed projects is well understood so that the impacts associated with the projects can be assessed. The process of identification and assessment of impacts will include:

- Determining the current environmental conditions in sufficient detail so that there is a baseline against which impacts can be identified and measured;
- Determining future changes to the environment that will occur if the activity does not proceed;
- Develop an understanding of the activity in sufficient detail to understand its consequences; and
- The identification of significant impacts which are likely to occur if the activity is undertaken.

As per the DEAT Guideline 5: Assessment of Alternatives and Impacts the following methodology is to be applied to the predication and assessment of impacts. Potential impacts should be rated in terms of the direct, indirect and cumulative:

- **Direct impacts** are impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity. These impacts are usually associated with the construction, operation or maintenance of an activity and are generally obvious and quantifiable.
- **Indirect impacts** of an activity are indirect or induced changes that may occur as a result of the activity. These types of impacts include all the potential impacts that do not manifest immediately when the activity is undertaken or which occur at a different place as a result of the activity.
- **Cumulative impacts** are impacts that result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities. The cumulative impacts will be assessed by identifying other solar energy project proposals and other applicable projects, such as construction and upgrade of electricity generation, and transmission or distribution facilities in the local area (i.e. within 20 km of the proposed Atlantis GreenTech project) that have been approved (i.e. positive EA has been issued) or is currently underway. The proposed and existing electrical and solar developments that will be considered as part of the EIA Phase is provided in Chapter 6 of this Scoping Report.

- **Spatial extent** – The size of the area that will be affected by the impact:
 - Site specific;
 - Local (<2 km from site);
 - Regional (within 30 km of site);
 - National; or
 - International (e.g. Greenhouse Gas emissions or migrant birds).
- **Intensity** – The anticipated severity of the impact:
 - High (severe alteration of natural systems, patterns or processes);
 - Medium (notable alteration of natural systems, patterns or processes); or
 - Low (negligible alteration of natural systems, patterns or processes).
- **Duration** – The timeframe during which the impact will be experienced:
 - Temporary (less than 1 year);
 - Short term (1 to 6 years);
 - Medium term (6 to 15 years);
 - Long term (the impact will cease after the operational life of the activity); or
 - Permanent (mitigation will not occur in such a way or in such a time span that the impact can be considered transient).
- **Reversibility of the Impacts** - the extent to which the impacts are reversible assuming that the project has reached the end of its life cycle (decommissioning phase) will be
 - High reversibility of impacts (impact is highly reversible at end of project life);
 - Moderate reversibility of impacts;
 - Low reversibility of impacts; or
 - Impacts are non-reversible (impact is permanent).
- **Irreplaceability of Resource Loss caused by impacts** – the degree to which the impact causes irreplaceable loss of resources assuming that the project has reached the end of its life cycle (decommissioning phase) will be:
 - High irreplaceability of resources (project will destroy unique resources that cannot be replaced);
 - Moderate irreplaceability of resources;
 - Low irreplaceability of resources; or
 - Resources are replaceable (the affected resource is easy to replace/rehabilitate).

Using the criteria above, the impacts will further be assessed in terms of the following:

- **Probability** –The probability of the impact occurring:
 - Improbable (little or no chance of occurring);
 - Probable (<50% chance of occurring);
 - Highly probable (50 – 90% chance of occurring); or
 - Definite (>90% chance of occurring).
- **Significance** – Will the impact cause a notable alteration of the environment?
 - Low to very low (the impact may result in minor alterations of the environment and can be easily avoided by implementing appropriate mitigation measures, and will not have an influence on decision-making);
 - Medium (the impact will result in moderate alteration of the environment and can be reduced or avoided by implementing the appropriate mitigation measures, and will only have an influence on the decision-making if not mitigated); or

- High (the impacts will result in major alteration to the environment even with the implementation on the appropriate mitigation measures and will have an influence on decision-making).
- **Status** - Whether the impact on the overall environment will be:
 - Positive - environment overall will benefit from the impact;
 - Negative - environment overall will be adversely affected by the impact; or
 - Neutral - environment overall not be affected.
- **Confidence** – The degree of confidence in predictions based on available information and specialist knowledge:
 - Low;
 - Medium; or
 - High.

Impacts will then be collated into the EMPr and these will include the following:

- Quantifiable standards for measuring and monitoring mitigatory measures and enhancements will be set. This will include a programme for monitoring and reviewing the recommendations to ensure their ongoing effectiveness.
- Identifying negative impacts and prescribing mitigation measures to avoid or reduce negative impacts. Where no mitigatory measures are possible this will be stated.
- Positive impacts will be identified and augmentation measures will be identified to potentially enhance positive impacts where possible.

Other aspects to be taken into consideration in the assessment of impact significance are:

- Impacts will be evaluated for the construction and operation phases of the development. The assessment of impacts for the decommissioning phase will be brief, as there is limited understanding at this stage of what this might entail. The relevant rehabilitation guidelines and legal requirements applicable at the time will need to be applied;
- Impacts will be evaluated with and without mitigation in order to determine the effectiveness of mitigation measures on reducing the significance of a particular impact;
- The impact evaluation will, where possible, take into consideration the cumulative effects associated with this and other facilities/projects which are either developed or in the process of being developed in the local area; and
- The impact assessment will attempt to quantify the magnitude of potential impacts (direct and cumulative effects) and outline the rationale used. Where appropriate, national standards are to be used as a measure of the level of impact.

Table 7.3 is to be used by specialists for the rating of impacts.

Table 7.3: Example of Table for Assessment of Impacts

Nature of impact	Spatial Extent	Duration	Intensity	Probability	Reversibility	Irreplaceability	Mitigation Measures	Significance and Status		Confidence Level
								Without Mitigation	With Mitigation	
CONSTRUCTION PHASE (EXAMPLE)										
Scenario 1: Vegetation loss during construction										
Loss of vegetation during the construction of internal roads	Local, i.e. less than 2 km from Facility	Long term, i.e. the impact will cease after the operational life span of the project	High, since there will be severe alteration of the natural system	Highly probable, since construction of the infrastructure cannot progress if vegetation is not cleared.	Moderate	High	Demarcate the construction footprint with hazard tape and ensure workers stay within this area, wherever practical. Educate workers on the need to stay on paths and established tracks wherever practical.	Medium (Negative Impact)	Low (Negative Impact)	High, since the prediction is made on available information

7.5 ISSUES TO BE ADDRESSED IN THE SPECIALIST STUDIES

The issues that will be addressed in the specialist studies/input are included in Chapter 7 of this Scoping Report, however they have been summarised below in Table 7.4 for ease of reference.

Table 7.4: Brief summary of Issues to be addressed during the EIA Phase as part of the specialist studies

(Note: other issues that are not included in the table below (i.e. social impacts, noise impacts etc) but will still be assessed by the EAP using the extensive existing information available for the project area – refer to Chapter 6)

SPECIALIST STUDY/INPUT	ISSUES TO BE ADDRESSED
Ecological Impact Assessment	<p><u>Construction and Operational Phase:</u></p> <ul style="list-style-type: none"> ▪ Ousting of fauna through increased anthropogenic activities, disturbance of refugia (location of an isolated population that was widespread in the past) and general change in habitat. ▪ Increased electrical light pollution leading to changes in nocturnal behavioural patterns amongst fauna. ▪ Exclusion (or entrapment) of in particular, larger fauna on account of the fencing of the site. ▪ Changes in edaphics (soils) on account of excavation and import of material, leading to alteration of plant communities and fossorial species in and around these points. ▪ Alteration of ecological processes on account of the exclusion of certain species inherent to the functional state of land. ▪ Increased shading of vegetation as a consequence of the PV arrays, will lead to changes in plant water relations and possible changes in plant community structures within the site. ▪ Changes in meteorological factors at a localised scale on account of the facility is likely to arise leading to long term, but generally latent changes in habitat. ▪ Loss of vegetation type which are endangered (Cape Flats Dune Strandveld and Atlantis Strand Fynbos)
Heritage Impact Assessment (Archaeology and Cultural Landscape)	<p><u>Construction and Operational Phases:</u></p> <ul style="list-style-type: none"> ▪ Direct disturbance and/or destruction of archaeological material; ▪ Direct impacts to the landscape through introduction of industrial type facilities; and ▪ Direct disturbance and/or destruction of possible graves.
Desktop Palaeontological Impact Assessment	<p><u>Construction Phase:</u></p> <ul style="list-style-type: none"> ▪ Potential damage to or destruction of fossil heritage at or near the surface within the study area.
Traffic Impact Statement	<p><u>Construction, Operational and Decommissioning Phases:</u></p> <ul style="list-style-type: none"> ▪ Increased traffic volumes impacting the local and regional road network; ▪ Impact of abnormal loads on the road network and traffic flow.

7.6 ALTERNATIVES TO BE ASSESSED IN THE EIA PHASE

A description of the alternatives that will be assessed or considered during the EIA Phase is provided in Chapter 6 of this Scoping Report. However, they have been summarised below for ease of reference:

- **No-go Alternative:**
 - The no-go alternative assumes that the proposed project will not go ahead i.e. it is the option of not constructing the proposed GreenTech facility. This alternative would result in no environmental impacts on the site or surrounding local area, as a result of the facility. It will provide a baseline against which other alternatives will be compared and considered during the EIA Phase.
- **Land Use Alternative:**
 - No other manufacturing types were deemed to be appropriate for the site and therefore these technologies will not be further assessed during the EIA Phase. The implementation of a GreenTech facility at the proposed project site is more favourable than other alternative energy facilities and other industrial land uses due to the following:
 - The support of the green economy in South Africa (and specifically the Western Cape) through the provision of locally manufactured renewable energy technologies.
 - The proposed GreenTech facility currently falls within the Atlantis SEZ which has been identified by the City of Cape Town as being of strategic importance for industrial and economic development (as discussed in Chapter 1 and Chapter 2 of this Scoping Report);
 - The zoning of the site as General Industrial allowing for its suitability and reduced sensitivity to sensitive receptors.
- **Location Alternatives within the Selected Site:**
 - The selection of the site (i.e. Zone 2 of the Atlantis SEZ) is described in Chapter 5 of this Scoping Report. During the EIA Phase, possible layout plans within the preferred Atlantis GreenTech project site will be discussed.
- **Technology Alternatives:**
 - Applicable and relevant technology options will be described during the EIA Phase, such as those relating to GreenTech and non-GreenTech.
- **Layout Alternatives:**
 - Layout alternatives for the project will be discussed following the input from the various specialists. The studies will aim to identify various environmental sensitivities present on the preferred site that should be avoided, which will be taken into account during the determination of the proposed layout of the GreenTech facility.
 - The use of the existing service roads will also be discussed during the EIA Phase.

It is important to note that where alternatives are not feasible or will not be assessed, a **motivation has been provided in Chapter 5 of this Scoping Report** . The preferred alternatives will be assessed during the EIA Phase.

7.7 TOR FOR THE SPECIALIST STUDIES

The TOR for the specialist studies will essentially consist of the generic assessment requirements and the specific issues identified for each discipline. The TOR have been updated to include relevant comments received from I&APs and authorities during the 30-day review of the Draft Scoping Report.

The following additional specialist studies have been identified based on the issues identified to date, as well as potential impacts associated with the project. The TOR for each specialist study is discussed in detail below. The

specialist studies and associated specialists are shown in Table 7.5 below. Additional specialist studies could possibly be commissioned as a result of issues raised during the Scoping Process.

Table 7.5: Specialist Studies and Associates Specialists

NAME	ORGANISATION	ROLE/STUDY TO BE UNDERTAKEN
Environmental Management Services (CSIR)		
Paul Lochner	CSIR	Technical Advisor and Quality Assurance (EAPSA) Certified
Kelly Stroebel	CSIR	Project Manager (Appointed EAP)
Rirhandzu Marivate	CSIR	Project Officer and GIS specialist
Specialists		
Paul Emms	Bergwind Botanical Surveys and Tours	Ecological Impact Assessment (including Terrestrial Ecology)
Christo Bredenhann	WSP	Traffic Impact Statement
Jonathan Kaplan	Agency for Cultural Resource Management (ACRM)	Heritage Impact Assessment and NID
John Pether	N/A	Desktop Palaeontological Impact Assessment

As explained in Chapter 7 of this Scoping Report, it is important to note at the outset that cumulative impacts will be assessed in the specialist studies (as applicable) by identifying other applicable projects, such as manufacturing facilities in the local area (i.e. within 20 km of the proposed Atlantis GreenTech projects) that have been approved (i.e. positive EA has been issued) or for which an EIA process is currently underway.

This Scoping and EIA process will make use of the extensive existing information and studies for the Atlantis area, as previously mentioned in this report. The reason for this is to preserve resources and to avoid the duplication of efforts for studies that have already been conducted. The Atlantis SEZ included a range of pre-feasibility studies which included information on the social, economic and biophysical environment. The Table below indicates the range of existing information and studies that will be used to inform his Scoping and EIA process (*Note: this list is not exhaustive and this table will be updated should additional information be used*)¹:

Table 7.6: List of existing information and studies that will inform this EIA process

INFORMATION SOURCE	AUTHOR/DATE
Basic Assessment (and all associated specialist studies) conducted for proposed 'green technology manufacturing cluster' industrial development and associated infrastructure on Portion 0 of Farm CA1183 and Portion 93 of farm CA4, Atlantis	Doug Jeffrey Environmental Consultants (Pty) Ltd - 2012
Basic Assessment (and all associated specialist studies) conducted for proposed 'green technology manufacturing cluster' industrial development and associated infrastructure on Farm CA1183, Portion 4 and Portion 1, Atlantis	Doug Jeffrey Environmental Consultants (Pty) Ltd - 2012
EIA for the proposed Atlantis Gas-to-Power facility on Portion 1 and Portion 4 of Cape Farm 1183, Western Cape	CSIR – 2017
Feasibility Report: Atlantis SEZ	Deloitte (commissioned by the Department of Trade and Industry) - 2014

¹ Some information sources are confidential and have not been released to the public, thus they have not been included in the table above

INFORMATION SOURCE	AUTHOR/DATE
Atlantis Special Economic Zone: Technical Investor Brochure	GreenCape
Economic Analysis of the Proposed Green-tech Special Economic Zone at Atlantis	Stratecon - 2015
GreenTech Atlantis Special Economic Zone: Annual Report 2016/17	GreenCape – 2016/17
The socio-economic impact of importing LNG into the West Coast of the Western Cape	Deloitte - 2015

7.8 MILESTONES IN THE EIA PROCESS

KEY MILESTONES ACTIVITIES	PROPOSED TIMEFRAME
I&AP, Stakeholder and Authority Review of the Draft Scoping Report (i.e. this report): 30 days	Jan 2019 – Feb 2019
Submit Final Scoping Report to the DEA&DP for Decision-making.	Feb 2019
Review of the Final Scoping Report by the DEA&DP (i.e. accept or refuse EA): 43 days since receipt of the Final Scoping Report.	Feb 2019 – March 2019
I&AP, Stakeholder and Authority Review of the Draft EIA Reports: 30 days	April 2019
Submit Final EIA Reports to the DEA&DP for Decision-making.	End April 2019
Review of the Final EIA Reports by the DEA&DP (i.e. grant or refuse EA): 107 days since receipt of the Final EIA Report.	April 2019 – August 2019
Next steps: 5 days for notification to applicant	

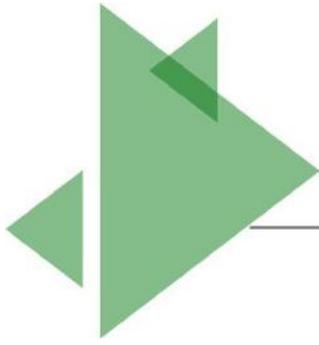
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CHAPTER 8

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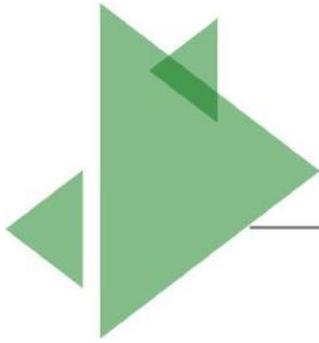
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APPENDIX A

Curriculum Vitae of the Environmental
Assessment Practitioner(s) and Declaration



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1 Curriculum Vitae of Paul Lochner – Project Leader

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Name of firm	CSIR
Name of staff	Paul Lochner
Profession	Environmental Assessment and Management
Position in firm	Manager: CSIR Environmental Management Services
Years' experience	24 years
Nationality	South African

Biographical Sketch

Paul Lochner commenced work at CSIR in 1992, after completing a degree in Civil Engineering and a Masters in Environmental Science, both at the University of Cape Town. His initial work at CSIR focused on sediment dynamics and soft engineering applications in the coastal zone, in particular, beach and dune management. He conducted several shoreline erosion analyses and prepared coastal zone management plans for beaches. He also prepared wetland management plans.

As the market for environmental assessment work grew, he led Environmental Impact Assessments (EIAs), in particular for coastal resort developments and large-scale industrial developments located on the coast; and Environmental Management Plans (EMPs), in particular for wetlands, estuaries and coastal developments. He has also been involved in researching and applying higher-level approaches to environmental assessment and management, such as Strategic Environmental Assessment (SEA). In 1998-1999, he coordinated the SEA research programme within the CSIR, which led to him being a lead author of the Guideline Document for SEA in South Africa, published by CSIR and national Department of Environmental Affairs (DEA) in February 2000.

In 1999 and 2000, he was the project manager for the legal, institutional, policy, financial and socio-economic component of the Cape Action Plan for the Environment ("CAPE"), a large-scale multi-disciplinary study to ensure the sustainable conservation of the Cape Floral Kingdom. This was funded by the Global Environmental Fund (GEF) and prepared for WWF-South Africa. The study required extensive stakeholder interaction, in particular with government institutions, leading to the development of a Strategy and Action Plan for regional conservation.

In July 2003, he was certified as an Environmental Assessment Practitioner by the Interim Certification Board for Environmental Assessment Practitioners of South Africa.

He has authored several guidelines for government. In 2004, he was lead author of the *Overview of IEM* document in the updated Integrated Environmental Management (IEM) Information Series published by national Department of

Environmental Affairs and Tourism (DEAT). In 2005, he was part of the CSIR team that prepared the series entitled *Guidelines for involving specialists in EIA processes* for the Western Cape Department of Environmental Affairs and Development Planning (DEADP); and he authored the *Guideline for Environmental Management Plans* published by Western Cape government in 2005. In 2006-2007, he worked closely with the (then) Dept of Minerals and Energy (DME) of South Africa to prepare a Guideline for Scoping, Environmental Impact Assessment and Environmental Management Plans for mining in South Africa.

Over the past 20 years has been closely involved with several environmental studies for industrial and port-related projects in Coega Industrial Development Zone (IDZ), near Port Elizabeth. This included the SEA for the establishment of the Coega IDZ in 1996/7, an EIA and EMP for a proposed aluminium smelter in 2002/3, and assistance with environmental permit applications for air, water and waste. At the Coega IDZ and port, he has also conducted environmental assessments for port development, LNG storage and a combined cycle gas turbine power plant, manganese export, rail development, marine pipelines, and wind energy projects.

Since 2009, he has undertaken numerous EIAs for the renewable energy sector, in particular for wind and solar photovoltaic energy projects. In these EIAs, he has been project leader and integrated the specialist findings from a range of specialist disciplines.

He is currently project leader on two Strategic Environmental Assessments (SEAs) that are being undertaken for national DEA. These SEAs are to support the implementation of the Strategic Integrated Projects (SIPs) that are being promoted by the Presidential Infrastructure Coordinating Committee (PICC). The SEA for Wind and Solar Photovoltaic Energy for South Africa is being conducted over 2013-2014, and the SEA for electricity grid infrastructure commenced January 2014.

Since 2009, Paul has been the manager of the Environmental Management Services (EMS) group within CSIR. This group currently consists of approximately 20 environmental assessment practitioners and a group assistant, with offices in Stellenbosch and Durban. EMS focuses on conducting complex environmental studies in challenging environments, such as remote and data poor regions in Africa (e.g. Cameroon, Gabon, Angola, Namibia and Ethiopia). We also specialise in environmental studies for emerging and innovative technologies, drawing on research and applied scientific expertise within CSIR. Our role is to assist in ensuring the sustainability of projects in terms of environmental and social criteria, by providing a range of environmental services that extend across the project lifecycle, from the pre-feasibility stage through to feasibility, commissioning, operations and closure. We provide this service to government, international agencies, private sector and non-government organisations.

EMPLOYMENT TRACK RECORD

The following table presents a sample of the projects that Paul Lochner has been involved in to this date:

Draft Scoping Report (v2) for GreenTech in Zone 2 of the Atlantis Special Economic Zone,
Atlantis Industrial, Western Cape

Completion Date	Project description	Role	Client
In progress	SEA for Aquaculture Development in South Africa (marine and freshwater)	Project leader	DEA and DAFF
In progress	SEA for the Square Kilometre Array radio-telescope in the Karoo, South Africa	Project leader	DEA and DST
2015-2017	SEA for Shale Gas Development in South Africa	Project co-leader	Dept of Environmental Affairs (DEA), DMR, DOE, DST, DWS
2015-2016	SEA for the development of Electrical Grid Infrastructure for South Africa	Project leader	DEA
2016-2017	EIA for the 75 MW x 12 solar photovoltaic energy projects near Dealesville, Free State	Project Leader	Mainstream Renewable Power SA
2014-2015	SEA of planning for the far south Cape Peninsula	Project Leader	City of Cape Town
2013-2015	EIA for the Ishwati Emoyeni 140 MW wind energy project and supporting electrical infrastructure near Murraysburg, Western Cape	Project Leader	Windlab
2013-2015	EIA for the Saldanha marine outfall pipeline	Project Leader	Frontier Saldanha Utilities
2012-2015	SEA for identification of renewable energy zones for wind and solar PV projects in South Africa	Project leader	DEA
2012-2013	Environmental Screening Study for a desalination plant for the City of Cape Town	Project leader	City of Cape Town & WorleyParsons
2012-2013	EIA for LNG Import to the Mossel Bay Gas-to-Liquid refinery (stopped end of Scoping)	Project leader	PetroSA
2012-2013	EIA for the desalination plant for the Saldanha area	Project leader	West Coast District Municipality & WorleyParsons
2012-2013	EIA for the manganese export terminal at the Port of Ngqura and Coega IDZ	Project leader	Transnet
2011 - 2012	EIA for the 100 MW solar photovoltaic project proposed by Mainstream Renewable Power at Blocuso, near Keimoes in the Northern Cape	Project leader	Mainstream Renewable Power
2011 – 2012	EIA for the 100 MW solar photovoltaic project proposed by Mainstream Renewable Power at Roode Kop Farm, near Douglas, in the Northern Cape	Project leader	Mainstream Renewable Power
2011 – 2012	EIA for the 75 MW solar photovoltaic project proposed by Solaire Direct at GlenThorne , near Bloemfontein in the Free	Project leader	Solaire Direct

Draft Scoping Report (v2) for GreenTech in Zone 2 of the Atlantis Special Economic Zone,
Atlantis Industrial, Western Cape

Completion Date	Project description	Role	Client
	State		
2011 – 2012	EIA for the 75 MW solar photovoltaic project proposed by SolaireDirect at Valleydora , near Springfontein in the Free State	Project leader	Solaire Direct
2010-2011	More than 10 Basic Assessments (BAs) for solar photovoltaic projects in the western cape, Northern Cape, Eastern Cape and Free State	Project leader	Various clients including Dutch, German, French and South African companies
2010/2011	EIA for the Langerfontein wind project near Darling, Western Cape.	Project leader	Mr Herman Oelsner, Khwe Khoa
2010/2011	EIA for a 100 MW wind project at Zuurbron and a 50 MW wind project Broadlands in the Eastern Cape	Project leader	WindCurrent SA (German-based company)
2010/2011	EIA for the proposed 143 MW Biotherm wind energy project near Swellendam , Western Cape, South Africa	Project leader	Biotherm South Africa (Pty) Ltd
2010/2011	EIA for the proposed InnoWind wind energy projects near Swellendam, Heidelberg, Albertinia and Mossel Bay (totalling approx 210 MW) , Western Cape, South Africa	Project leader	InnoWind South Africa (Pty) Ltd
2009/2010	EIA for the proposed Electrawinds wind energy facility of 45-75 MW capacity in the Coega IDZ, Eastern Cape	Project leader	Electrawinds N.V. (Belgium)
2009/2010	EIA for proposed 180 MW Jeffreys Bay wind energy project , Eastern Cape	Project Leader and co-author	Mainstream Renewable Power South Africa
2009/2010	Basic Assessment for the national wind Atlas for South Africa	Project leader	SANERI and SA Wind Energy Programme, Dept of Energy
2009/2010	EIA for the proposed Gecko soda plant , Otjivalunda and Arandis, Namibia (cancelled)	Project leader	Gecko, Namibia
2009-2010	EIA for the proposed desalination plant at Swakopmund, Namibia	Project leader	NamWater, Namibia
2009	EMP for the Operational Phase of the Berg River Dam , Franschoek, South Africa	Project leader and report co-author	TCTA, South Africa
2009/2010 (on hold)	EIA for the proposed crude oil refinery at Coega, South Africa	Project leader and lead author	PetroSA, South Africa
2008	Environmental Risk Review for proposed LNG/CNG import to Mossel Bay, South Africa	Project leader and lead author	PetroSA, South Africa

Completion Date	Project description	Role	Client
2008	Review of the Business Plan for catchment management for the Berg Water Dam Project, Franschhoek, South Africa	Project reviewer and co-author	TCTA, South Africa
2007 – 2010	EIA for proposed Jacobsbaai Tortoise Reserve eco-development , Saldanha, Western Cape	Project Leader and co-author	Jacobsbaai Tortoise Reserve (Pty) Ltd
2007 – 2010	Independent reviewer for the EIA proposed Amanzi lifestyle development, Port Elizabeth	Independent reviewer appointed to advise EAP	Public Process Consultants and Pam Golding
2007 – 2008	EIA for proposed 18 MW Kouga wind energy project , Eastern Cape	Project Leader and co-author	Genesis Eco-Energy (Approved by DEDEA in March 2009)
2007	Review of EIA for the proposed Hanglip Eco-Development , Plettenberg Bay, Western Cape	Co-author of review of EIA, undertaken on behalf of DEADP	Dept of Environmental Affairs & Development Planning, Western Cape
2006-2007	Scoping phase for the EIA for the proposed Coega LNG-to-Power Project at the Port of Ngqura, Coega IDZ	Project Leader and co-author	Eskom and iGas
2006-2007	Guideline for Scoping, Environmental Impact Assessment and Environmental Management Plans for mining in South Africa	Project leader and co-author	Dept of Minerals and Energy (DME), South Africa
2006	Environmental Impact Assessment (EIA) for the extension of the Port of Ngqura, Eastern Cape	Project Leader and co-author	Transnet
2006	Integrating Sustainability Into Strategy: Handbook (Version 1)	Project Leader and co-author	CSIR (STEP research report)
2005	Technology Review for the proposed aluminium smelter at Coega, South Africa	Project Leader and lead author	Alcan, Canada
2005	Environmental and Social Impact Assessment (ESIA) report for the proposed alumina refinery near Sosnogorsk, Komi Republic, Russia	Project manager and co-author	Komi Aluminium, Russia, IFC, EBRD
2005	Guideline for Environmental Management Plans (EMPs) for the Western Cape province, including conducting a training course for provincial government	Author	Dept of Environmental Affairs & Development Planning, Western Cape
2005	Guideline for the review of specialist studies undertaken as part of environmental assessments	Member of Steering Committee and project facilitator	Dept of Environmental Affairs & Development Planning, Western Cape

Draft Scoping Report (v2) for GreenTech in Zone 2 of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

Completion Date	Project description	Role	Client
2004	Review of Strategic Management Plan for Table Mountain National Park (2001-2004)	Reviewer and co-author	South African National Parks
2004	Strategic Needs Assessment Process for mainstreaming sustainable development into business operations	Researcher and co-author	CSIR (internal research)
2004	Environmental Monitoring Committees booklet in the IEM Information Series for DEAT	Contributing author	Department of Environmental Affairs and Tourism (DEAT)
2004	Overview of Integrated Environmental Management (IEM) booklet in the IEM Information Series	Lead author and researcher	DEAT
2003	Environmental Screening Study for gas power station, South Africa	Project Manager and lead author	Eskom, iGas and Shell
2003	Environmental Management Programme (EMP) Framework for the proposed Coega Aluminium Smelter; and assistance with preparing permit and licence applications	Project Manager and lead author	Pechiney, France
2003	Environmental Management Plan for the Operational Phase of the wetlands and canals at Century City, Cape Town	Project leader and lead author	Century City Property Owners' Association
2002	Environmental Impact Assessment for the proposed Pechiney aluminium smelter at Coega, South Africa	Project Manager and lead author	Pechiney, France
2002 - 2003	Research project: Ecological impact of large-scale groundwater abstraction on the Table Mountain Group aquifer	Project Manager	Water Research Commission
2002	Environmental Management Plan for the Eskom Wind Energy Demonstration Facility in the Western Cape	Co-author	Eskom
2001-2002	Environmental Impact Assessment for the Eskom Wind Energy Demonstration Facility in the Western Cape	Quality control & co-author	Eskom
2001	Environmental Due Diligence study of four strategic oil storage facilities in South Africa	Project manager and co-author	SFF Association
2000	Cape Action Plan for the Environment: a biodiversity Strategy and Action Plan for the Cape Floral Kingdom - legal, institutional, policy, financial and socio-economic component	Project manager and contributing writer	World Wide Fund for Nature (WWF): South Africa
1999	Environmental Management Plan for the establishment phase of the wetlands and canals at Century City, Cape Town	Project manager and lead author	Monex Development Company
1999	Environmental Management Programme for the Thesen Islands development,	Process design and Co-author	Chris Mulder Associates Inc; Thesen

Completion Date	Project description	Role	Client
	Knysna		and Co.
1999	Management Plan for the coastal zone between the Eerste and Lourens River, False Bay, South Africa	Project manager and lead author	Heartland Properties and Somchem (a Division of Denel)
1998	Environmental Assessment of the Mozal Matola Terminal Development proposed for the Port of Matola, Maputo, Mozambique	Project manager and author.	<i>SNC-Lavalin-EMS</i>
1998	Strategic Environmental Assessment (SEA) for the Somchem industrial complex at Krantzkop, South Africa	Project manager and co-author	Somchem, a Division of Denel
1997	Strategic Environmental Assessment (SEA) for the proposed Industrial Development Zone and Harbour at Coega, Port Elizabeth, South Africa	SEA project manager and report writer	Coega IDZ Initiative Section 21 Company
1996	Environmental Impact Assessment of Development Scenarios for Thesen Island, Knysna, South Africa	Project manager and report writer	Thesen and Co.
1996	Environmental Impact Assessment of the Management Options for the Blouvtlei wetlands, Cape Town	Project manager and report writer	Ilco Homes Ltd (now Monex Ltd)
1995	Environmental Impact Assessment for the Saldanha Steel Project, South Africa	Report writing and management of specialist studies	Saldanha Steel Project
1994	Environmental Impact Assessment for the upgrading of resort facilities on Frégate Island, Seychelles	Member of the project management team, co-author, process facilitator	Schneid Israelite and Partners
1994	Environmental Impact Assessment for exploration drilling in offshore Area 2815, Namibia	Project manager and co-author	Chevron Overseas (Namibia) Limited
1994	Management Plan for the Rietvlei Wetland Reserve, Cape Town	Project manager and lead author	Southern African Nature Foundation (now WWF-SA)
1993	Beach management plan for Stilbaai beachfront and dunes, South Africa	Project manager and lead author	Stilbaai Municipality
1993	Beach and dune management plan for Sedgefield for the beach east of the mouth of the Swartvlei estuary	Project manager and lead author	Nel and De Kock Planners, George
1993	Coastal Stability analysis and beach management plan for the Table View coastline north of Blaauwberg Road, Cape Town	Project manager and lead author	Milnerton Municipality

EMPLOYMENT RECORD

- **1992 to present** Involved in coastal engineering studies; and various forms of environmental assessment and management studies. Council for Scientific and Industrial Research – Environmental Management Services (EMS) - Stellenbosch

QUALIFICATIONS/EDUCATION

- M. Phil. Environmental Science (University of Cape Town)
- B.Sc. Civil Engineering (awarded with Honours) (University of Cape Town)

LANGUAGE CAPABILITY

LANGUAGES	Speaking	Reading	Writing
English	Excellent	Excellent	Excellent
Afrikaans	Moderate	Moderate	Moderate

2 Curriculum Vitae of Kelly Stroebel – Project Manager

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Name of firm CSIR
Name of staff Kelly Stroebel
Profession Environmental Assessment Practitioner
Position in firm Environmental Assessment Practitioner
Years' experience 4 years
Nationality South African

Biographical Sketch

Kelly holds a Bachelor of Science with Honours in Environmental Science from Rhodes University in Grahamstown and is currently pursuing a Masters at the University of Stellenbosch. Her undergraduate degree was a Bachelor of Science with majors in Environmental Science and Zoology. She is currently working as an environmental assessment practitioner at the Council for Scientific and Industrial Research (CSIR). Kelly has been the Project Manager of several EIA's in South Africa and several Basic Assessments for the Special Needs and Skills Development Programme. She has assisted in the SIP projects including the National Wind & Solar Strategic Environmental Assessment (SEA) and Electricity Grid Infrastructure SEA as SEA which were commissioned by the national Department of Environmental Affairs. On a personal level, Kelly enjoys the outdoors, traveling and SCUBA diving and is passionate about the field of environmental science and management.

EMPLOYMENT TRACK RECORD

The following table presents a sample of the projects that Kelly Stroebel has been involved in to this date:

Completion Date	Project description	Role	Client
2017	EIA for gas-to-power in the Atlantis SEZ	Project Manager/EAP	CoCT/GreenCape
In progress	EIA's in the South African energy sector	Project Manager/EAP	Private energy companies and organs of state
In progress	Special Needs and Skills Development Programme (DEA-CSIR)	Project Manager conducting Environmental services such as basic Assessments and Environmental Screening Studies.	Various SMME's and Community Trusts
2015	Strategic Environmental Assessment (SEA) for Electricity Grid Infrastructure	Project member-stakeholder engagement and project support.	National Department of Environmental Affairs
2015	EIA for two proposed	Project member- Public	Umgeni Water

Completion Date	Project description	Role	Client
	Desalination plants on the KZN coast.	Participation Process, stakeholder engagement and project support.	
August 2014	National Strategy for Sustainable Development Review (NSSD1)	Project member- research and report development.	National Department of Environmental Affairs
2013-2014	Strategic Environmental Assessment (SEA) for roll out of photovoltaic solar and wind energy in South Africa.	Project member- Stakeholder engagement and project support	National Department of Environmental Affairs

EMPLOYMENT RECORD

- **2015 to present** Environmental Scientist and Assessment Practitioner. Council for Scientific and Industrial Research – Consulting and Analytical Services (CAS) - Stellenbosch
- **2014** Environmental Scientist and Assessment Practitioner (Intern). Council for Scientific and Industrial Research – Consulting and Analytical Services (CAS) - Stellenbosch
- **2013** Environmental Education Counselor - Fernwood Cove Summer Camp, USA.
- **2012** Graduate Assistant: Rhodes University Department of Environmental Science.
- **2011** Vacation Internship: Environmental Management Department of Mittal Steel, Newcastle.
- **2011** Vacation Internship: Northern Kwa-Zulu Natal branch of WWF.

QUALIFICATIONS/EDUCATION

- BSc Hons. Environmental Science (Rhodes University, Grahamstown, South Africa)
 - Honours modules including Environmental Impact Assessment, Statistics, Climate Change Adaptation, Urban Ecology and Environmental Water Quality.
 - Honours thesis: “Water use and conservation by households of different economic status in King William’s Town”
- Bachelor of Science with Distinction (Rhodes University, Grahamstown, South Africa)
 - Undergraduate courses including Environmental Science, Zoology, Ichthyology, Chemistry, Earth Science, Botany and Computer Science.
- IEB Matric Certificate, 5 Distinctions (St Dominic’s Academy, Newcastle)

TRAINING, CONFERENCES AND PROFESSIONAL REGISTRATIONS

- Member of the Conference Organizing Committee (COC) for the IAIA Annual Conference 2017
- Project Management Practices and Principles with MS projects with the University of Pretoria: Distinction obtained (2016)
- Introduction to Earth Observation using ENVI with the University of Stellenbosch (2016)
- Public Participation Course with IAP2 (2016)
- Conflict Management Accredited through Conflict Dynamics (2015)
- Media and Science Training Accreditation through Jive Media Africa (2015)
- IAIA WC Workshop for Integrating Climate Change into EIA practice (2015)
- Presented on the DEA-CSIR “Special Needs and Skills Development Programme” at the 2014 & 2015 Annual IAIA (International Association for Impact Assessment) South Africa Conference.
- Environmental Impact Assessment Training Course accreditation through Coastal and Environmental Services, Grahamstown (2012)

- DEA&DP Training on the EIA Regulations (2014)
- Registered as a Candidate Natural Scientist with the South African Council for Natural Scientific Professions (SACNASP) (Reg #: 100151/14)
- Member of the South African Affiliate of the International Association for Impact Assessment (Membership no: 3588)

LANGUAGE CAPABILITY

LANGUAGES	Speaking	Reading	Writing
English	Excellent	Excellent	Excellent
Afrikaans	Moderate	Moderate	Moderate

3 Curriculum Vitae of Rirhandzu Marivate – Project Member

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Position in Firm: Junior Environmental Assessment Practitioner (305759)
Full Name: Marivate, Rirhandzu Anna
Specialisation: Environmental & Ecological Science
Professional Registration: Cand. Sci. Nat. Environmental Sciences – Reg Number: 100147/14
Date of Birth: 23 February 1989
Nationality: South African

BIOSKETCH

Rirhandzu holds a Bachelor degree in Zoology & Geology, Honours in Ecology, Environment and Conservation from the University of the Witwatersrand; and has environmental research experience with the Climate Systems Analysis Group at the University of Cape Town. The research focus has been within the domain of socioecology, looking at investigating local ecological knowledge of stakeholders on the provisioning of freshwater resources and its impacts on the management for of the Berg river in the Western Cape, South Africa. The research looked at how perception on resource utilisation affects management priorities, and creating a matrix of perceptions would be used a tool for better decision making within the Berg River Catchment Management Areas. Rirhandzu is currently studying towards her Master in Philosophy in Sustainable Development at the University of Stellenbosch. Here current research interest is looking at environmental planning and management within municipalities and how to optimise green spaces by including ecosystem goods and services to build resilience within those municipalities.

Since 2014, Rirhandzu has worked at the Council for Scientific and Industrial Research (CSIR) as an Environmental Assessment Practitioner (EAP) Intern within the Environmental Management Services (EMS) group, and from 2015 as a Junior Environmental Practitioner for the same group. Her duties include Assistance to other EAPs within EMS in their projects; Research in environmental assessment topics (e.g. indications, best practice, legislation); Report writing and project management; Participating in various forms of environmental assessments (BAs, EIAs, SEAs); consultation with stakeholders and public meetings; and Project administration (e.g. contracting and invoicing). She is particularly involved with the Special Needs and Skills Development (SNSD) Programme, which looks at assisting Community Trusts, Small, Micro to Medium Enterprises, with environmental services. She has also been involved with the Monitoring and Evaluation of the National Strategy for Sustainable Development by the Department of Environmental Affairs (DEA). Rirhandzu has established good client relationships and partnerships with the Land Bank, Department of Agriculture, Forestry and Fisheries (DAFF), and Department of Mineral Resources (DMR) through the SNSD Programme. She is involved as a stakeholder in the continuous consultations for the Development of Environmental Indices in response to the National Development Plan (NDP), led by the DEA.

EMPLOYMENT TRACK RECORD

Completion Date	Project description	Role	Client
2014 (in progress)	Special Needs and Skills Development Programme: Programme management and conducting of Basic Assessments for disadvantaged communities/businesses/enterprises	Project Manager; Stakeholder Co-ordination; Project Support; Mentorship; Ecological Input	National Department of Environmental Affairs (DEA), South Africa
2013- 2014	Monitoring and Evaluation for the National Strategy for Sustainable Development and Action Plan.	Project Member; Stakeholder engagement, Researcher, Report Writing	National Department of Environmental Affairs (DEA), South Africa
2013-2015	Strategic Environmental Assessment (SEA) for wind and solar PV energy in South Africa.	Data Management	National Department of Environmental Affairs (DEA), South Africa
2014-2016	Strategic Environmental Assessment (SEA) for Electricity Grid Infrastructure (EGI).	Stakeholder Engagement	National Department of Environmental Affairs (DEA), South Africa
2014	Screening Study (SS) for the Development of Biochar and Composting Facilities to support land restoration near the proposed Ntambelanga Dam, Umzimvubu Catchment, Eastern Cape.	Project Manager, Project Research & Report Writing	National Department of Environmental Affairs (DEA), South Africa
2015	Environmental Screening Study (ESS) for projects undertaken in the Amatikulu Aquaculture Development Zone, KwaZulu-Natal.	Project Manager, Project Research & Report Writing	National Department of Agriculture, Forestry & Fisheries (DAFF), S Africa
2015-2016	Development of Sustainability Indicators for the National Integrated State of the Environment Report for Namibia.	Project Manager, Project Research & Report Writing	Ministry of Environment and Tourism (MET), Namibia
2016	Basic Assessment for the development of a 5.5ha pig production facility and a 2.5 ha chicken broiler facility on Farm Rietvalei, Portion 1 & 6, near Delmas, Mpumalanga.	Project Manager	Mokate Estates (Pty) Ltd
2016	Basic Assessment for the development of a 0.6 hectare Chicken Layer Facility on a 7.8 hectare farm in Mashau-Bodwe Village, Makhado District, Limpopo.	Project Manager	Wanga Poultry (Pty) Ltd
2016	Sustainable Development Appraisal for Gold Standard on a microprogramme of the NOVA Brickstar Wood Stove in the Mahlaba Area, Limpopo.	Project Member, Project Researcher, Translator	Gold Standard Foundation
2017 (In Progress)	Sustainable Development Goal Lab on “Mainstreaming resilience into climate change adaptation and disaster risk planning.”	Project Member	Future Earth; Stockholm Resilience Centre;

Completion Date	Project description	Role	Client
			University of Tokyo
2017 (In progress)	Basic Assessment for the proposed development of a leisure and cultural village on Farm Moiloa 412-JO, Dinokana Village, North West.	Project Manager	Makadima Leisure & Cultural Village 101 (Pty) Ltd
2017 (In progress)	Basic Assessment for the expansion of a Chicken Layer Facility on a 4.4 hectare farm on plot 226 Withok Estate, Brakpan, Ekurhuleni District, Gauteng	Project Manager	Lewin AgriBusiness (Pty) Ltd
2017 (In progress)	Basic Assessment for the expansion of a Chicken Broiler Facility on a 2.57 hectare farm on plot 62, Mapleton, Ekurhuleni District, Gauteng.	Project Manager	Mthunzi Chicken Supplier (Pty) Ltd

EMPLOYMENT RECORD

- **2015 to present** Environmental Scientist and Assessment Practitioner. Council for Scientific and Industrial Research – Consulting and Analytical Services (CAS) - Stellenbosch
- **2014-2015** CSIR Environmental Management Services (EMS) Environmental Scientist and Assessment Practitioner (Intern).
- **2011-2013** UCT Environmental & Geographical Science Department (N Methner; K Vickery) Researcher & Teaching Assistant
- **2010** WITS School of Animal Plant & Environmental Sciences (Prof K Balkwill) Teaching Assistant.
- **2009** ESKOM Generation Environmental Management (D Herbst) Environmental Officer (Intern).
- **2009** WITS School of Geosciences (Dr G Drennan; Dr M Evans) Teaching & Field Assistant.
- **2008** WITS School of Animal Plant & Environmental Sciences (T Gardiner; Dr W Twine) Environmental Control & Field Assistant.
- **2008** Jane Goodall Institute (Dr L Duncan) Field Assistant.

QUALIFICATIONS

- **2010 University of the Witwatersrand (Wits) BSc Honours (Ecology, Environment and Conservation)**
Coursework: Approaches to Science, Experimental Design and Biostatistics, Introduction to Statistics Computer programme R, Introduction to Geographic Information Systems, Global Change: Impact on Soils, Plants and the Environment, Ecological Engineering and Phytoremediation, Ethnoecology.
Thesis: Species Composition and Population Structure of Trees Protected in Cultivated Fields of Rural Villages in the Bushbuckridge Region, Mpumalanga Province (Supervisors: Dr Wayne Twine, Prof Ed Witkowski)
- **2006 – 2009 University of the Witwatersrand (Wits) BSc (Zoology & Ecology)**
Senior Courses: Research Report Writing; Exploration and Environmental Geochemistry; Introduction to Palaeoclimatology; Environmental Geomorphology; Diversity, Ecology and Economic Importance of Algae; Functional Ecology in Changing Environments; Ecological Communities and Biodiversity Conservation; Structural Geology; Igneous Petrology; Physics of the Earth and Plate Tectonics; Ore Petrology and Mineralisation Processes

SHORT-COURSES, CONFERENCES AND WORKSHOPS

- 2017 Ecosystem-Based Adaptation: Developing Capacity for Implementation, SANBI, Pretoria National Botanical Gardens, June 2017.
- 2015 Practical Adaptation for vulnerable communities by Adaptation Network, Kirstenbosch Botanical Gardens, Cape Town, August 2015.

- 2015 International Association for Impact Assessors South Africa (IAIAsa) National Annual Conference, August 2016, KZN.
- 2015 Sharpening the Tool: New Techniques & Methods in Environmental Impact Assessments, SE Solutions, Stellenbosch, Western Cape
- 2014 CiLLA Project Management I Course on July 2014 at CSIR Stellenbosch
- 2014 International Association for Impact Assessors South Africa (IAIAsa) Air Quality Management (AQM) Workshop on June 2014 in Western Cape
- 2014 South African Environmental Observation Network (SAEON) Graduate Student Network (GSN) Annual Conference September 2014, Eastern Cape.
- 2014 IAIAsa National Conference from August 2014 at Midrand, Gauteng
- 2014 African Student Energy (ASE) Annual Summit Cape Peninsula University of Technology June 2014, Western Cape
- 2014 International Association for Impact Association South Africa (IAIAsa) New National Environmental Management Act (NEMA) regulations March 2014 Western Cape
- 2014 Applied Centre for Climate and Earth Systems Sciences (ACCESS) facilitation for teacher training January 2014, WC.
- 2012 International Conference for Freshwater Governance for Sustainable Development November 2012, KwaZulu-Natal
- 2012 Society of South African Geographers (SSAG) Annual Conference at University of Cape Town June 2012, Western Cape
- 2011 Applied Centre for Climate and Earth System Sciences (ACCESS) teacher training, Western Cape
- 2011 BlueBuck Environmental Network Annual Summit at Rhodes University, Eastern Cape
- 2010 Biodiversity and People Mini-Symposium, University of the Witwatersrand, October 2010, Mpumalanga

LANGUAGE CAPABILITY

	Speaking	Reading	Writing
Setswana	Excellent	Excellent	Excellent
Xitsonga	Excellent	Excellent	Excellent
English	Excellent	Excellent	Excellent

4 EAP DECLARATION

I, Kelly Stroebel, declare that:

- I act as the independent environmental practitioner in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting environmental impact assessments, including knowledge of the Act, regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I will take into account, to the extent possible, the matters listed in regulation 8 of the Regulations when preparing the application and any report relating to the application;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application;
- I will ensure that the comments of all interested and affected parties are considered and recorded in reports that are submitted to the competent authority in respect of the application, provided that comments that are made by interested and affected parties in respect of a final report that will be submitted to the competent authority may be attached to the report without further amendment to the report;
- I will keep a register of all interested and affected parties that participated in a public participation process;
- I will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not;
- I will provide the competent authority any information that is provided by the EAP to interested and affected parties and any responses; by the EAP to comments or inputs made by interested or affected parties;
- the information provided in this scoping report has been sourced from relevant literature, legislation, previous studies and specialist input and is therefore believed to be correct;
- I will perform all other obligations as expected from an environmental assessment practitioner in terms of the Regulations; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.



Environmental Assessment Practitioner
Signed at Stellenbosch on the 24 January 2019

Scoping and Environmental Impact Assessment (EIA) for GreenTech in Zone 2
of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

DRAFT SCOPING REPORT



APPENDIX B

Database of Interested and Affected Parties

Database of Interested and Affected parties

Institution / Farm (Position)	Names	Postal Address	Email	Post
NATIONAL				
National Energy Regulator of South Africa (NERSA)	Mr. Thembani Bukula	P.O. Box 40343 Arcadia 0007	✓	✓
National Department of Environmental Affairs Branch: Environmental Quality and Protection	Hilda Bezuidenhout	Private Bag X447 Pretoria 0001		✓
National Department of Environmental Affairs	Salome Mambane	Private Bag X447 Pretoria 0001	✓	✓
National Department of Environmental Affairs	Lydia Kutu	Private Bag X447 Pretoria 0001	✓	✓
National Department of Environmental Affairs	Milicent Solomons	Private Bag X447 Pretoria 0001	✓	✓
National Department of Environmental Affairs	Mohammed Essop	Private Bag X 447, Pretoria, 0001	✓	✓
National Department of Environmental Affairs	Mmamohale Kabasa	Private Bag X 447, Pretoria, 0001	✓	✓
National Department of Environmental Affairs (Biodiversity)	Mrs. Wilma Lutsch	Private Bag X 447, Pretoria, 0001	✓	✓
National Department of Environmental Affairs (Air Quality)	Mrs. Deborah Ramalope	Private Bag X 447, Pretoria, 0001	✓	✓
National Department of Environmental Affairs (Climate Change)	Dr. Thulie Khumalo	Private Bag X 447, Pretoria, 0001	✓	✓
Department of Energy	Mr. Andre Otto	Private Bag X19 Arcadia 0007		✓
Department of Energy	Ms. Nnana Direro	Private Bag X19 Arcadia 0007		✓
Department of Energy	Wolsey Otto Barnard	Private Bag X96, Pretoria, 0001		✓
Department of Rural Development and Land Reform Spatial Planning	Leona Bruiners	Private Bag X9073 Cape Town 8000		✓

Draft Scoping Report (v2) for GreenTech in Zone 2 of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

Institution / Farm (Position)	Names	Postal Address	Email	Post
Department of Agriculture, Forestry & Fisheries	H.J. Buys	Private Bag x120, Gezina Pretoria, 0031		✓
Department of Water Affairs	Tocky Ngobeni	Private Bag X313, Pretoria, 0000		✓
Client: GreenCape & CoCT				
City of Cape Town	Morne Theron/Pat Titmuss	Milnerton Civic Building 87 Pienaar Street, Milnerton, 7435		
GreenCape	Thabo Thulare		✓	
GreenCape- Project Manager	Mike Mulcahy		✓	
PROVINCIAL				
Department of Water Affairs Western Cape	Tandi Mmachaka		✓	
Dept of Rural Development and Land Reform – W/Cape Spatial Planning	Leona Bruiners		✓	
Western Cape Department of Agriculture – LandCare	Cor van der Walt	Muldersvlei Road; Head Office; Elsenburg; 7607		✓
Western Cape Roads Authority	Steve Ferreir		✓	
Western Cape Department of Environmental Affairs & Development Planning	Constance Musemburi	7th Floor, 1 Dorp Street, Cape Town 8001		✓
Western Cape Department of Environmental Affairs & Development Planning	Mische Engelbrecht	7 th Floor, Utilitas Building 1 Dorp Street Cape Town 8001	✓	✓
Western Cape Tourism	The Head	Corner Burg & Shortmarket Street		✓
West Coast Regional Office: Regional Manager: Transport and Public Works	Rhowheln Roode	Private Bag X5 Ceres 7599		✓
DEADP: Pollution Management	Joy Leaner	Private Bag X9086, Cape Town, 8000		✓
DEADP: Pollution Management	Xenthia Smith	1 st Floor, Property Center, 1 Dorp Street, Cape Town		✓
Department of Water and Sanitation: Western Cape	Rashid Khan	Private Bag X16, Sanlamhof, 7532		✓
Department of Agriculture: Western Cape	Mr. Andre Roux	Private Bag X1 Elsenburg 7607	✓	
Municipality & Ward Counsellors				
City of Cape Town: Municipal Manager	Achmat Ebrahim	Private Bag X9181, Cape Town, 8000	✓	✓

Draft Scoping Report (v2) for GreenTech in Zone 2 of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

Institution / Farm (Position)	Names	Postal Address	Email	Post
City of Cape Town: Environmental Resources Management Department (ERMD)	Pat Titmuss	P.O. Box 35, Milnerton, 7435		✓
City of Cape Town: Air Quality	Ozzie Oswald	P.O. Box 2815, Cape Town, 8000		✓
City of Cape Town: Ecology	Candice Haskins	Private Bag X9181, Cape Town, 8000	✓	
City of Cape Town: Environmental Resource Planning	Bongani Mnisi	Private Bag X9181, Cape Town, 8000	✓	
City of Cape Town Economic Development	Anton Groenewald	Private Bag X9181, Cape Town, 8000	✓	
City of Cape Town: Energy, Environmental and Spatial Planning	Japie Hugo	Private Bag X9181, Cape Town, 8000	✓	✓
Ward Councillor – Atlantis Industrial 32	Barbara Rass	Private Bag X9181, Cape Town, 8000	✓	✓
Ward Councillor 55	Bernadette Le Roux	Private Bag X9181, Cape Town, 8000	✓	
Ward Councillor 105	Justin Basson	Private Bag X9181, Cape Town, 8000	✓	
Ward Councillor 29	Cynthia Clayton	Private Bag X9181, Cape Town, 8000	✓	
OTHER				
Atlantis Foundries (Pty) Ltd		PO Box 1701, Dassenberg, 7359		✓
BIOTA Southern Africa	Gerda Kriel	12 Avond Street, Vredendal North, 8161		✓
CapeNature	Alana Duffell-Canham	Assegaibosch Nature Reserve, Stellenbosch 7599		✓
Birdlife South Africa	Pam Barrett	PO Box 515, Randburg, 2125		✓
Heritage Western Cape	The Director	3rd Floor, Protea Assurance Building Green Market Square Cape Town, 8000		✓
South African Heritage Resources Agency (SAHRA)	Jenna Lavin	P.O. Box 4637, Cape Town, 8000	✓	✓
WWF – SA (Land Programme Manager)	Natasha Wilson		✓	
Eskom Land Development, Western Region	Justine Wyngaardt	Land Development, Eskom, PO Box 222, Brackenfell, 7561		✓
Atlantis Residents Association	McKenna S	28 Geranium Street Atlantis 7349		✓
Atlantis Civic Association	Nagan Roy	P O Box 963 7352 Reygersdal		✓
Cape Nature - Land	Rhett Smart	Private Bag X5014 7599	✓	

Institution / Farm (Position)	Names	Postal Address	Email	Post
Use Advice		Stellenbosch		
Atlantis Farmers Association	Van der Merwe	P O Box 919 7349 Reygersdal		✓
Eskom	Ronald Marais	PO Box 1091, Johannesburg, 2000	✓	
Eskom Senior Supervisor: Land & Rights	Henk Landman	P.O. Box 222 Brackenfell 7561	✓	
Eskom	Hannes Coetzee	P.O. Box 222 Brackenfell 7561	✓	
Eskom	Riaan Smit	P.O. Box 222 Brackenfell 7561	✓	✓
Eskom	John Geeringh	PO Box 1019, Johannesburg 2000	✓	
Eskom Energy Services Manager	Stephen Koopman	P.O. Box 356 Bloemfontein 9301	✓	
Cape Action for People and the Environment (C.A.P.E.)	Dr. Mandy Barnett	Private Bag X7 Claremont 7735	✓	
SANParks General Manager Cape Research Centre	Melodie McGeoch		✓	
Agri Wes-Cape	Cornie Swart	P.O. Box 227 Paarl 7620		✓
Endangered Wildlife Trust	Ms. Megan Diamond	Private Bag X11 Parkview 2122	✓	
Western Cape Nature Conservation Board	Chrizzette Kleynhans	Private Bag X7, Belville, 7535	✓	✓
Atlantis Investment Facilitation Office (AIFO)	Stanley Visser	William Gourlay Rd Atlantis Industria, Atlantis Foundries Business Park	✓	
Globesight (Pty) Ltd	Ferdi Pieterse		✓	
Atlantic Renewable Energy Partners (Pty) Ltd	Sonia Miszczak	101, Block A, West Quay Building	✓	

Institution / Farm (Position)	Names	Postal Address	Email	Post
		7 West Quay Road, Waterfront Cape Town, 8000		
Atlantic Renewable Energy Partners (Pty) Ltd	Des Brasington	101, Block A, West Quay Building 7 West Quay Road, Waterfront Cape Town, 8000	✓	
Atlantic Renewable Energy Partners (Pty) Ltd	David Peinke	101, Block A, West Quay Building 7 West Quay Road, Waterfront Cape Town, 8000	✓	
Abengoa E&C (Abeinsa) South Africa	Dominic Goncalves	101, Block A, West Quay Building	✓	
Wartsila	Wayne Glossop		✓	
Mulilo	Jannie Mueller		✓	
iKapa Energy (Pty) Ltd	Craig Morkel		✓	
SANRAL	Ms Marilyn Kleinhans	Private Bag X19 Bellville 7535	✓	✓
Transnet Ports Authority: Cape Town	Bongani Dilima		✓	
Mulilo	Bertus van Niekerk	PO Box 50 Cape Town International Airport South Africa 7525	✓	
Eskom	Sibulele Mdingi	Western Cape Operations Unit Eskom Road, Brackenfell, 7560		
Sasol	Esca Coetsee	33 Baker Street, Rosebank		

Scoping and Environmental Impact Assessment (EIA) for GreenTech in Zone 2
of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

DRAFT SCOPING REPORT



APPENDIX C

Advertisements and Site Notices

Newspaper Advertisement to invite I&APs to register on the project database in the pre-application phase - The Cape Times (English) 25th October 2018

NOTICE OF SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT AND AVAILABILITY OF DRAFT SCOPING REPORT FOR PUBLIC REVIEW

Project Title: Environmental Impact Assessment (EIA) for GreenTech in Zone 2 of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape.

Project Proposal: The City of Cape Town (CoCT) and GreenCape is proposing to develop a Green Technology Manufacturing facility and associated infrastructure in the Atlantis Special Economic Zone (SEZ) on the land designated as Zone 2. Zone 2 is made up of several land portions namely Portion Remainder of ERF 277, ERF 246, ERF 254 and ERF Portion Remainder of 171 (these are the new ERF numbers, previously known as portions of Cape Farm 1183), Atlantis Industrial, approximately 40 km north of Cape Town. In terms of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) and the 2014 NEMA Environmental Impact Assessment (EIA) Regulations (as amended on 7 April 2017) promulgated in Government Gazette 40772 and Government Notice (GN) R327, R326, R325 and R324, a full Scoping and Environmental Impact Assessment (EIA) Process is required for the construction of the proposed Atlantis GreenTech facility. The Applicant has appointed the Council for Scientific and Industrial Research (CSIR) to undertake the EIA Processes in order to determine the biophysical, social and economic impacts associated with undertaking the proposed activity. The following listed activities pertain to this application:

EIA Activities:

GNR 327: Activity 47

GNR 325: Activity 15

GNR 324: Activity 12

A hard copy of the Draft Scoping Report is available for public viewing at the Avondale Public Library (Grosvenor Ave, Avondale). The Report can also be downloaded from the following website: <https://www.csir.co.za/environmental-impact-assessment>

You are kindly requested to register your interest in the project and submit any comments on the Draft Scoping Report to the consultant indicated below within 30 days of this notification (including weekends, but excluding public holidays). Please provide your full name, full postal address, phone numbers, email and state your area of interest and/or concern to: **Ms. Kelly Stroebel, CSIR, PO Box 320, Stellenbosch 7599, Phone: (021) 888 2432, Fax: (021) 888 2693 or Email: kstroebel@csir.co.za**. You have until, on or before **26 November 2018** to do so.



Newspaper Advertisement - Die Burger (Afrikaans) 25th October 2018

KENNISGEWING VAN BESTEK- EN OMGEWINGSIMPAK STUDIE EN BESKIKBAARHEID VAN DIE KONSEP BESTEK VERSLAG VIR PUBLIEKE KOMMENTAAR

Projek Titel: Omgewingsimpak Studie (OIS) vir die Groen Tegnologie "GreenTechnology" Vervaardigings fasiliteit in Sone (Zone) 2 van die Atlantis Spesiale Ekonomiese Sone ("Atlantis Special Economic Zone"), Atlantis Industrie, Wes-Kaap.

Projek Voorstel: Die Stad Kaapstad en GreenCape is van voorneme om 'n Groen Tegnologie ("Green Technology") Vervaardigings fasiliteit en geassosieerde infrastruktuur in die Atlantis Spesiale Ekonomiese Sone op te rig op grond wat as Sone 2 aangewys is. Sone 2 bestaan uit 'n aantal eiendomme naamlik Gedeelte Restant van ERF 277, ERF 246, ERF 254 en Gedeelte Restant van ERF 171 (hierdie is die nuwe erf nommers, voorheen bekend as Gedeeltes van Cape Farm 1183), Atlantis Industrie, ongeveer 40 km Noord van Kaapstad.

In terme van die Omgewings Bewarings Wet of NEMA (Wet 107 van 1998), soos gewysig, en die 2014 NEMA OIS Regulasies (soos gewysig op 7 April 2017) gepromulgeer in Staatskennisgewing (GNR 324, 325, 326 en 327) in Staatskoerant No 40772, vereis die genoemde projek dat 'n OIS onderneem moet word. Die aansoeker het die Wetenskaplike en Nywerheidsnavorsingsraad (WNNR; CSIR) aangestel om die vereiste OIS prosesse te onderneem om die moontlike ecologiese, sosiale en ekonomiese impakte te bepaal van die voorgestelde projek.

The volgende gelyste OIS aktiwiteite het betrekking tot die projek en hierdie aansoek:

GNR 327: Aktiwiteit 47;

GNR 325: Aktiwiteit: 15; en

GNR 324: Aktiwiteit: 12.

'n Harde kopie van die Konsep Bestek Studie is tans beskikbaar vir publieke besigtiging by die Avondale Publieke Biblioteek (Grosvenor Ave, Avondale). The verslag kan ook agelaai word by die webwerf: <https://www.csir.co.za/environmental-impact-assessment>

U word hiermee genooi om as 'n belangstellende en/of geaffekteerde party te registreer op die projek en ook om kommentaar wat u mag he op die Konsep Bestek Studie te stuur aan die konsultant genoem hieronder binne 30 dae vanaf hierdie kennisgewing (naweke ingesluit, maar publieke vakansie dae uitgesluit).

Verskaf asseblief u volle naam, volledige posadres, telefoonnommers, e-pos en dui aan wat u area van belang en / of kommer is: **Me Kelly Stroebel, CSIR, Posbus 320, Stellenbosch 7599, Telefoon 021 888 2432, Faks 021 888 2476, E-pos: kstroebel@csir.co.za**. U het tot en met 26 November 2018 om dit te doen.



Draft Scoping Report (v2) for GreenTech in Zone 2 of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

GreenCape NOTICE OF ENVIRONMENTAL IMPACT ASSESSMENT PUBLIC PARTICIPATION PROCESS

Project Title: Environmental Impact Assessment (EIA) for GreenTech in Zone 2 of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

Project Proposal: The City of Cape Town (CoCT) and GreenCape is proposing to develop a Green Technology Manufacturing facility and associated infrastructure in the Atlantis Special Economic Zone (SEZ) on the land designated as Zone 2. Zone 2 is made up of several land parcels namely: Portion Remainder of ERF 277, ERF 246, ERF 254 and ERF Portion Remainder of ERF 171 (these are the new ERF numbers, previously known as portions of Cape Farm 1182), Atlantis Industrial, approximately 48 km north of Cape Town, in terms of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) and the 2014 National Environmental Impact Assessment (EIA) Regulations (as amended on 7 April 2017) promulgated in Government Gazette 40772 and Government Notice (GN) R307, R308, R325 and R324, a full Scoping and Environmental Impact Assessment (EIA) Process is required for the construction of the proposed Atlantis GreenTech facility. The Applicant has appointed the Council for Scientific and Industrial Research (CSIR) to undertake the EIA Process in order to determine the technical, social and economic impacts associated with undertaking the proposed activity. The following listed activities pertain to this application:

EIA Activities:
GNR 327: Activity 47
GNR 325: Activity 15
GNR 324: Activity 12

To ensure you are included on the project register as well as to raise issues and concerns, you are kindly requested to register your interest in the project and submit any comments you may have to the consultant indicated below. Please provide your full name, full postal address, phone numbers, Email and state your area of interest and/or concern to:

CSIR
Me Kelly Stroebel
CSIR
PO Box 326, Stellenbosch 7799
Phone 021 989 2432, Fax 021 898 2476
Email: kstroeel@csir.co.za



Figure 1.1: Locality of the Atlantis GreenTech site where the development is proposed.

GreenCape KENNISGEWING VAN BESTEK- EN OMGEWINGSIMPAK STUDIE

Project Titel: Omgewingsimpak Studie (OIS) vir die Groen Tegnologie "GreenTechnology" Vervaardigings fasiliteit in Sone (Zone) 2 van die Atlantis Spesiale Ekonomiese Sone ("Atlantis Special Economic Zone"), Atlantis Industrie, Wes-Kaap.

Project Kwaliteit: Die Stad Kaapstad en GreenCape is vas voornemens om 'n Groen Tegnologie ("Green Technology") Vervaardigings fasiliteit en geassosieerde infrastruktuur in die Atlantis Spesiale Ekonomiese Sone (op te lê) op grond wat as Sone 2 aangewys is. Sone 2 bestaan uit 'n aantal eienomme naamlik Gedeelete Restant van ERF 277, ERF 246, ERF 254 en Gedeelete Restant van ERF 171 (waarde is die nuwe erf nommers, voorheen bekend as Gedeeletes van Cape Farm 1182), Atlantis Industrie, ongeveer 48 km Noord van Kaapstad.

In terme van die Omgewings Bewarings Wet of NEMA (Wet 107 van 1998), soos gewysig, en die 2014 NEMA OIS Regulasies (soos gewysig op 7 April 2017) voorgeskryf in Staatsaankondigings (GNR 324, 325, 326 en 327) in Staatsgort No 40772, versoek die gemiddelde projek dat 'n OIS ondersoek moet word. Die aansoek het die Werksaamheid en Maatwaaieromvang (WEMA) CSIR) aangestel om die vereiste OIS proses te onderneem om die moontlike ekologiese, sosiale en ekonomiese impakte te bepaal van die voorgestelde projek.

Die volgende gelyke OIS aktiwiteite het betrekking tot die projek en handel asook:
GNR 327: Aktiwiteit 47;
GNR 325: Aktiwiteit 15; en
GNR 324: Aktiwiteit 12.

U word hiermee gevra om as 'n belangstufende en/of geïnteresseerde party te registreer so die oorsig en ook om kommentaar wat u mag het op die Konsiep Besk. Studie te stuur aan die konsultant. Hieronder blyk 30 dae vanaf hierdie aankondigings. Hierdie impakte, soos verstaan, sal ook algeheel verskaf word. U word raam, volvoegs te verskaf, teeltoenommers, e-pos en dit sal ook wees 'n area van belang en/of kommentaar.

CSIR
Me Kelly Stroebel
CSIR
PO Box 326, Stellenbosch 7799
Phone 021 989 2432, Fax 021 898 2476
Email: kstroeel@csir.co.za



Figure 1.1: Locality of the Atlantis GreenTech site where the development is proposed.

Contents of site notices (English and Afrikaans)



NOTICE OF ENVIRONMENTAL IMPACT ASSESSMENT PUBLIC PARTICIPATION PROCESS



Project Title: Environmental Impact Assessment (EIA) for GreenTech in Zone 2 of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

Project Proposal: The City of Cape Town (CoCT) and GreenCape is proposing to develop a Green Technology Manufacturing facility and associated infrastructure in the Atlantis Special Economic Zone (SEZ) on the land designated as Zone 2. **Zone 2 is made up of several land portions namely Portion Remainder of ERF 277, ERF 246, ERF 254 and ERF Portion Remainder of 171 (these are the new ERF numbers, previously known as Cape Farm 1183), Atlantis Industrial, approximately 40 km north of Cape Town.** In terms of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) and the 2014 NEMA Environmental Impact Assessment (EIA) Regulations (as amended on 7 April 2017) promulgated in Government Gazette 40772 and Government Notice (GN) R327, R326, R325 and R324, a full Scoping and Environmental Impact Assessment (EIA) Process is required for the construction of the proposed Atlantis GreenTech facility. The Applicant has appointed the Council for Scientific and Industrial Research (CSIR) to undertake the EIA Processes in order to determine the biophysical, social and economic impacts associated with undertaking the proposed activity. The following listed activities pertain to this application:

EIA Activities:

- GNR 327: Activity 47.
- GNR 325: Activity 15
- GNR 324: Activity 12

To ensure you are included on the project register as well as to raise issues and concerns, you are kindly requested to register your interest in the project and submit any comments you may have to the consultant indicated below. Please provide your full name, full postal address, phone numbers, Email and state your area of interest and/ or concern to:



Ms Kelly Stroebel
CSIR
PO Box 320, Stellenbosch 7599
Phone 021 888 2432, Fax 021 888 2476
Email: kstroebel@csir.co.za

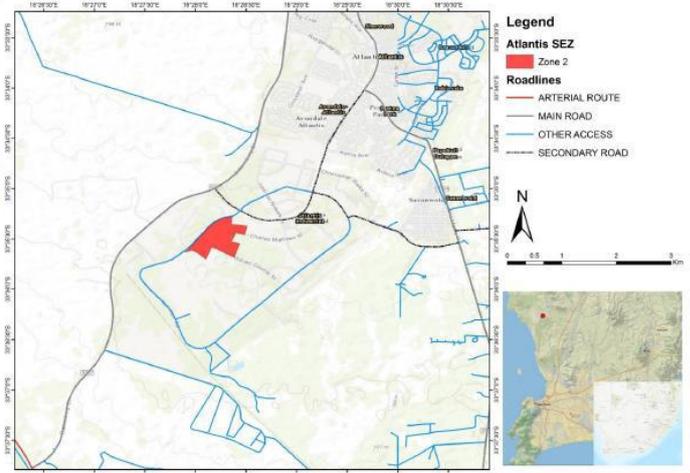


Figure 1: Locality of the Atlantis GreenTech site where the development is proposed.



KENNISGEWING VAN BESTEK- EN OMGEWINGSIMPAK STUDIE

Projek Titel: Omgewingsimpak Studie (OIS) vir die Groen Tegnologie "GreenTechnology" Vervaardigings fasiliteit in Sone (Zone) 2 van die Atlantis Spesiale Ekonomiese Sone ("Atlantis Special Economic Zone"), Atlantis Industrie, Wes-Kaap.

Projek Voorstel: Die Stad Kaapstad en GreenCape is van voorneme om 'n Groen Tegnologie ("Green Technology") Vervaardigings fasiliteit en geassosieerde infrastruktuur in die Atlantis Spesiale Ekonomiese Sone op te rig op grond wat as Sone 2 aangewys is. Sone 2 bestaan uit 'n aantal eiendomme naamlik Gedeelte Restant van ERF 277, ERF 246, ERF 254 en Gedeelte Restant van ERF 171 (hierdie is die nuwe erf nommers, voorheen bekend as Gedeeltes van Cape Farm 1183), Atlantis Industrie, ongeveer 40 km Noord van Kaapstad.

In terme van die Omgewings Bewarings Wet of NEMA (Wet 107 van 1998), soos gewysig, en die 2014 NEMA OIS Regulasies (soos gewysig op 7 April 2017) gepromulgeer in Staatskennisgewing (GNR 324, 325, 326 en 327) in Staatskoerant No 40772, vereis die genoemde projek dat 'n OIS onderneem moet word. Die aansoeker het die Wetenskaplike en Nywerheidsnavorsingsraad (WNNR; CSIR) aangestel om die vereiste OIS prosesse te onderneem om die moontlike ecologiese, sosiale en ekonomiese impakte te bepaal van die voorgestelde projek.

The volgende gelyste OIS aktiwiteite het betrekking tot die projek en hierdie aansoek:

- GNR 327: Aktiwiteit 47;
- GNR 325: Aktiwiteit: 15; en
- GNR 324: Aktiwiteit: 12.

U word hiermee genooi om as 'n belangstellende en/of geaffekteerde party te registreer op die projek en ook om kommentaar wat u mag he op die Konsep Bestek Studie te stuur aan die konsultant genoem hieronder binne 30 dae vanaf hierdie kennisgewing (naweke ingesluit, maar publieke vakansie dae uitgesluit). Verskaf asseblief u volle naam, volledige posadres, telefoonnommers, e-pos en dui aan wat u area van belang en / of kommer is:



Ms Kelly Stroebel
CSIR
PO Box 320, Stellenbosch 7599
Phone 021 888 2432, Fax 021 888 2476
Email: kstroebel@csir.co.za

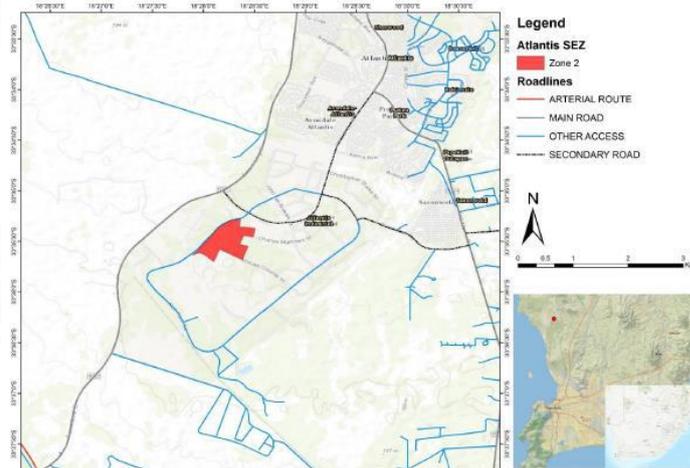


Figure 1: Locality of the Atlantis Gas-to-Power sites where the development is proposed.

Scoping and Environmental Impact Assessment (EIA) for GreenTech in Zone 2
of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

DRAFT SCOPING REPORT



APPENDIX D

Copies of correspondence to and from I&APs

Copies and Proof of Correspondence Sent to I&APs for the release of the pre-application Draft Scoping Report for Review (25 October 2018)

CSIR Environmental Management Services
P. O. Box 320, Stellenbosch, 7599
Tel: 021 888 2432
Fax: 021 888 2472
Email: kstroebel@csir.co.za



25 October 2018

Dear Interested and Affected Party,

RE: RELEASE OF DRAFT SCOPING REPORT FOR COMMENT: PROPOSED GREENTECH PROJECT IN ZONE 2 OF THE ATLANTIS SPECIAL ECONOMIC ZONE, ATLANTIS INDUSTRIAL, WESTERN CAPE

The City of Cape Town (CoCT): Property Management Department in collaboration with GreenCape is proposing to develop a Green Technology Manufacturing facility (hereafter referred to as "GreenTech") and associated infrastructure in the Atlantis Special Economic Zone (SEZ) on the land designated as Zone 2. Zone 2 is made up of several land portions that will comprise the "site", namely ERF Portion Remainder of ERF 277, ERF 246, ERF 254 and ERF Portion Remainder of 171 (these are the new ERF numbers, previously known as portions of Cape Farm 1183), Atlantis Industrial, approximately 40 km north of Cape Town. The portions that comprise the site (i.e. Zone 2) make up a total of 32.6 ha which will be used for the proposed development.

In terms of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations promulgated in Government Gazette 40772 and Government Notice (GN) R327, R326, R325 and R324 on 7 April 2017, a full Scoping and EIA Process is required for the construction of the GreenTech facility. The Council for Scientific and Industrial Research (CSIR) has been appointed by the Project Applicant to undertake the separate requisite Scoping and EIA Process for the proposed project.

In line with the above, as a pre-identified I&AP on the project database, you are hereby notified of the **release of the Draft Scoping Report** for the Atlantis GreenTech project to all registered I&APs and stakeholders for a 30-day review period, which will extend from **25th October 2018 to the 26th November 2018**. Please submit all comments by no later than 26th November 2018 to the following contact person:

<p>Ms Kelly Stroebel CSIR: Environmental Management Services PO Box 320, Stellenbosch, 7599 Email: kstroebel@csir.co.za Tel: 021 888 2432</p>

Hard copies of the Draft Scoping Report are available for public viewing at the **Avondale Library** (Grosvenor Ave, Avondale, Western Cape). The Draft Scoping Report can also be downloaded from the following website: <https://www.csir.co.za/environmental-impact-assessment>

All comments received during this 30 day review period will be recorded and included in the Final Scoping Report for submission to the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP) for decision-making in line with Regulations 21 and 22 of the 2014 EIA Regulations (GN R326), as amended on 7 April 2017. As a registered I&AP on the project database, you will be notified of the submission of the Final Scoping Report to the DEA&DP for decision-making.

Should you have any queries or require additional information please do not hesitate to contact the undersigned using the contact details provided above.

Sincerely,

Kelly Stroebel
Project Manager
CSIR Environmental Management Services

Email sent to all I&APs on 25 October 2018

From: Kelly Stroebel
To: BC ronald.marais@eskom.co.za; marais@eskom.co.za; LandmaHJ@eskom.co.za; henk.landman@eskom.co.za; Hannes.coetzee@eskom.co.za; coetzeeh@eskom.co.za; Riaan.smit@eskom.co.za; smitr@eskom.co.za; John.geeringh@eskom.co.za; Stephen.koopman@eskom.co.za; Koopmans@eskom.co.za; Barnett@capeaction.org.za; melodiem@sanparks.org; carl@awk.co.za; megand@ewt.org.za; Ck@wcnbc.co.za; Stanley.Visser@capetown.gov.za; Ferdi@globesight.co.za; sonia@atlanticep.com; des@atlanticep.com; david@atlanticep.com; dominic.goncalves@abengoa.com; wayne.glossop@wartsila.com; jannie@mulilo.com; craig.morkel@ikapa-energy.co.za; Kleinhansm@nra.co.za; bongani.dilima@transnet.net; bertus@mulilo.com; MdingiS@eskom.co.za; esca.coetzee@sasol.com; city.manager@capetown.gov.za; jlavin@sahra.org.za; nwilson@wwf.org.za; candice.haskins@capetown.gov.za; bongani.mnisi@capetown.gov.za; anton.groenewald@capetown.gov.za; japie.hugo@capetown.gov.za; Barbara.Rass@capetown.gov.za; bernadette.leroux@capetown.gov.za; Justin.Basson@capetown.gov.za; Cynthia.Clayton@capetown.gov.za; rsmart@capenature.co.za; Sally.chambers@capetown.gov.za; Susan.moodell@capetown.gov.za; Tania.lewis@capetown.gov.za; morne.theron@capetown.gov.za; Ian.Gildenhuys@capetown.gov.za; thabo@greencape.co.za; mike@greencape.co.za; francis@green-cape.co.za; mmachakat@dwa.gov.za; lbruiners@ruraldevelopment.gov.za; Sferreir@pgwc.co.za; Mische.engelbrecht@westerncape.gov.za; Xenthia.Smith@pgwc.gov.za; AndreR@elsenburg.com; thembani.bukula@nersa.org.za; hbezuidenhout@environment.gov.za; Wlutsch@environment.gov.za; DRamalope@environment.gov.za; TKhumalo@environment.gov.za; ehanekom@westerncape.gov.za; aduffell-canham@capenature.co.za; Wilna.kloppers@westerncape.gov.za; Waseef.dhansay@westerncape.gov.za; Pat.titmus@capetown.gov.za; keithbharrison@lando.co.za; morgan.griffiths@wessa.co.za; BarryP@dws.gov.za; Peter.flower@capetown.gov.za; Gerhard.Gerber@westerncape.gov.za; tammy.christie@westerncape.gov.za(...)
Date: 25/10/2018 12:01
Subject: Notification of EIA process and DSR for public review - Atlantis GreenTech Project
Attachments: CSIR Letter to I&APs_GreenTech DSR_Oct2018.pdf

Dear Stakeholder,

RE:RELEASE OF DRAFT SCOPING REPORT FOR COMMENT: Proposed GreenTech PROJECT in Zone 2 of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

Please see attached letter notifying you of the release of the Draft Scoping Report for the above-mentioned project for a 30 day public review period in terms of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations promulgated in Government Gazette 40772 and Government Notice (GN) R327, R326, R325 and R324 as amended on 7 April 2017.

The review period will run from 25th October 2018 to the 26th November 2018. Please submit all comments by that date using the contact details contained within the attached letter. Hard copies of the Draft Scoping Report are available for public viewing at the Avondale Library (Grosvenor Ave, Avondale, Western Cape). The Draft Scoping Report can also be downloaded from the following website:
<https://www.csir.co.za/environmental-impact-assessment>

Please feel free to contact the undersigned should you have any queries relating to the above.

Kind Regards,

Kelly Stroebel
Environmental Assessment Practitioner (EAP)
CSIR Stellenbosch

kstroebel@csir.co.za
Tel. : 021 888 2432
PO Box 320, Stellenbosch, 7599

Proof of Delivery of Email sent to all I&APs on 25 October 2018

Recipients:

Recipient	Action	Date & Time	Comment
 abengoa.com	Transferred	25/10/2018 12:01	
BC: dominic.goncalves@abengoa.com(dominic.goncalves@abengoa.com)	Delivered	25/10/2018 12:01	
 atlanticep.com	Transferred	25/10/2018 12:01	
BC: david@atlanticep.com(david@atlanticep.com)	Delivered	25/10/2018 12:01	
BC: des@atlanticep.com(des@atlanticep.com)	Delivered	25/10/2018 12:01	
BC: sonia@atlanticep.com(sonia@atlanticep.com)	Delivered	25/10/2018 12:01	
 atlantisfoundries.com	Transferred	25/10/2018 12:01	
BC: af-info@atlantisfoundries.com(af-info@atlantisfoundries.com)	Delivered	25/10/2018 12:01	
 awk.co.za	Transferred	25/10/2018 12:01	
BC: carl@awk.co.za(carl@awk.co.za)	Delivered	25/10/2018 12:01	
 capeaction.org.za	Transferred	25/10/2018 12:01	
BC: Barnett@capeaction.org.za(Barnett@capeaction.org.za)	Undeliverable	30/10/2018 12:47	
 capenature.co.za	Transferred	25/10/2018 12:01	
BC: aduffell-canham@capenature.co.za(aduffell-canham@capenature.co.za)	Transferred	25/10/2018 12:01	2.0.0 message relayed
BC: rsmart@capenature.co.za(rsmart@capenature.co.za)	Transferred	25/10/2018 12:01	2.0.0 message relayed
 capetown.gov.za	Transferred	25/10/2018 12:01	
BC: Susan.moodell@capetown.gov.za(Susan.moodell@capetown.gov.za)	Undeliverable	25/10/2018 12:01	
 capetown.gov.za	Transferred	25/10/2018 12:01	
BC: anton.groenewald@capetown.gov.za(anton.groenewald@capetown.gov.za)	Undeliverable	25/10/2018 12:02	
BC: Barbara.Rass@capetown.gov.za(Barbara.Rass@capetown.gov.za)	Delivered	25/10/2018 12:02	
BC: bernadette.leroux@capetown.gov.za(bernadette.leroux@capetown.gov.za)	Undeliverable	25/10/2018 12:02	
BC: bongani.mnisi@capetown.gov.za(bongani.mnisi@capetown.gov.za)	Delivered	25/10/2018 12:02	
BC: candice.haskins@capetown.gov.za(candice.haskins@capetown.gov.za)	Delivered	25/10/2018 12:02	
BC: charline.mckie@capetown.gov.za(charline.mckie@capetown.gov.za)	Delivered	25/10/2018 12:02	
BC: city.manager@capetown.gov.za(city.manager@capetown.gov.za)	Delivered	25/10/2018 12:02	

Draft Scoping Report (v2) for GreenTech in Zone 2 of the Atlantis Special Economic Zone,
Atlantis Industrial, Western Cape

BC: Cynthia.Clayton@capetown.gov.za(Cynthia.Clayton@capetown.gov.za)	Delivered	25/10/2018 12:04	
BC: Ian.Gildenhuis@capetown.gov.za(Ian.Gildenhuis@capetown.gov.za)	Delivered	25/10/2018 12:02	
BC: japie.hugo@capetown.gov.za(japie.hugo@capetown.gov.za)	Undeliverable	25/10/2018 12:02	
BC: Justin.Basson@capetown.gov.za(Justin.Basson@capetown.gov.za)	Undeliverable	25/10/2018 12:02	
BC: morne.theron@capetown.gov.za(morne.theron@capetown.gov.za)	Delivered	25/10/2018 12:02	
BC: Pat.titmus@capetown.gov.za(Pat.titmus@capetown.gov.za)	Undeliverable	25/10/2018 12:02	
BC: Peter.flower@capetown.gov.za(Peter.flower@capetown.gov.za)	Delivered	25/10/2018 12:04	
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BC: Stanley.Visser@capetown.gov.za(Stanley.Visser@capetown.gov.za)	Delivered	25/10/2018 12:04	
BC: Tania.lewis@capetown.gov.za(Tania.lewis@capetown.gov.za)	Delivered	25/10/2018 12:02	
 cl2cape.co.za	Transferred	25/10/2018 12:01	
BC: Antoinette@cl2cape.co.za(Antoinette@cl2cape.co.za)	Transferred	25/10/2018 12:02	2.0.0 message relayed
 dmr.gov.za	Transferred	25/10/2018 12:01	
BC: Duduzile.Kunene@dmr.gov.za(Duduzile.Kunene@dmr.gov.za)	Transferred	25/10/2018 12:01	2.0.0 message relayed
 dwa.gov.za	Transferred	25/10/2018 12:01	
BC: mmachakat@dwa.gov.za(mmachakat@dwa.gov.za)	Transferred	25/10/2018 12:01	2.0.0 message relayed
 dws.gov.za	Transferred	25/10/2018 12:01	
BC: BarryP@dws.gov.za(BarryP@dws.gov.za)	Transferred	25/10/2018 12:01	2.0.0 message relayed
 elsenburg.com	Transferred	25/10/2018 12:01	
BC: AndreR@elsenburg.com(AndreR@elsenburg.com)	Transferred	25/10/2018 12:04	2.0.0 message relayed
 energy.gov.za	Transferred	25/10/2018 12:01	
BC: nnana.direro@energy.gov.za(nnana.direro@energy.gov.za)	Transferred	25/10/2018 12:01	2.0.0 message relayed
 environment.gov.za	Transferred	25/10/2018 12:01	
BC: DRamalope@environment.gov.za(DRamalope@environment.gov.za)	Transferred	25/10/2018 12:01	2.0.0 message relayed
BC: hbezuidenhout@environment.gov.za(hbezuidenhout@environment.gov.za)	Transferred	25/10/2018 12:01	2.0.0 message relayed

Draft Scoping Report (v2) for GreenTech in Zone 2 of the Atlantis Special Economic Zone,
Atlantis Industrial, Western Cape

BC: TKhumalo@environment.gov.za(TKhumalo@environment.gov.za)	Transferred	25/10/2018 12:01	2.0.0 message relayed
BC: Wlutsch@environment.gov.za(Wlutsch@environment.gov.za)	Transferred	25/10/2018 12:01	2.0.0 message relayed
 eskom.co.za	Transferred	25/10/2018 12:01	
BC: coetzeeh@eskom.co.za(coetzeeh@eskom.co.za)	Undeliverable	25/10/2018 20:05	
BC: Hannes.coetzee@eskom.co.za(Hannes.coetzee@eskom.co.za)	Undeliverable	25/10/2018 12:02	
BC: henk.landman@eskom.co.za(henk.landman@eskom.co.za)	Undeliverable	25/10/2018 20:05	
BC: John.geeringh@eskom.co.za(John.geeringh@eskom.co.za)	Transferred	26/10/2018 04:07	2.0.0 message relayed
BC: Koopmans@eskom.co.za(Koopmans@eskom.co.za)	Undeliverable	25/10/2018 12:02	
BC: LandmaHJ@eskom.co.za(LandmaHJ@eskom.co.za)	Undeliverable	25/10/2018 12:02	
BC: maraisr@eskom.co.za(maraisr@eskom.co.za)	Undeliverable	25/10/2018 20:05	
BC: MdingiS@eskom.co.za(MdingiS@eskom.co.za)	Undeliverable	25/10/2018 12:02	
BC: Riaan.smit@eskom.co.za(Riaan.smit@eskom.co.za)	Transferred	26/10/2018 04:07	2.0.0 message relayed
BC: ronald.marais@eskom.co.za(ronald.marais@eskom.co.za)	Transferred	26/10/2018 05:16	2.0.0 message relayed
BC: smitr@eskom.co.za(smitr@eskom.co.za)	Transferred	26/10/2018 05:16	2.0.0 message relayed
BC: Stephen.koopman@eskom.co.za(Stephen.koopman@eskom.co.za)	Undeliverable	25/10/2018 20:05	
 ewt.org.za	Transferred	25/10/2018 12:01	
BC: megand@ewt.org.za(megand@ewt.org.za)	Undeliverable	25/10/2018 12:01	
 flexoline.co.za	Transferred	25/10/2018 12:01	
BC: zubeida@flexoline.co.za(zubeida@flexoline.co.za)	Delivered	25/10/2018 12:01	
 globesight.co.za	Transferred	25/10/2018 12:01	
BC: Ferdi@globesight.co.za(Ferdi@globesight.co.za)	Delivered	25/10/2018 12:01	
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BC: mike@greencape.co.za(mike@greencape.co.za)	Transferred	25/10/2018 12:01	2.0.0 message relayed
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 green-cape.co.za	Transferred	25/10/2018 12:01	

Draft Scoping Report (v2) for GreenTech in Zone 2 of the Atlantis Special Economic Zone,
Atlantis Industrial, Western Cape

BC: francis@green-cape.co.za(francis@green-cape.co.za)	Transferred	25/10/2018 12:01	2.0.0 message relayed
 ikapa-energy.co.za	Transferred	25/10/2018 12:01	
BC: craig.morkel@ikapa-energy.co.za(craig.morkel@ikapa-energy.co.za)	Transferred	25/10/2018 12:01	2.0.0 message relayed
 insimbi-alloys.co.za	Transferred	25/10/2018 12:01	
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BC: keithbharrison@lando.co.za(keithbharrison@lando.co.za)	Transferred	25/10/2018 12:07	2.0.0 message relayed
 mulilo.com	Transferred	25/10/2018 12:01	
BC: bertus@mulilo.com(bertus@mulilo.com)	Transferred	25/10/2018 12:01	2.0.0 message relayed
BC: jannie@mulilo.com(jannie@mulilo.com)	Transferred	25/10/2018 12:01	2.0.0 message relayed
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 ruraldevelopment.gov.za	Transferred	25/10/2018 12:01	
BC: lbriuners@ruraldevelopment.gov.za(lbriuners@ruraldevelopment.gov.za)	Undeliverable	30/10/2018 12:47	
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Draft Scoping Report (v2) for GreenTech in Zone 2 of the Atlantis Special Economic Zone,
Atlantis Industrial, Western Cape

BC: jlavin@sahra.org.za(jlavin@sahra.org.za)	Undeliverable	25/10/2018 12:01	
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BC: busiswa@sarebi.co.za(busiswa@sarebi.co.za)	Undeliverable	25/10/2018 12:01	
BC: jane@sarebi.co.za(jane@sarebi.co.za)	Undeliverable	25/10/2018 12:01	
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BC: esca.coetzee@sasol.com(esca.coetzee@sasol.com)	Transferred	25/10/2018 12:04	2.0.0 message relayed
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BC: customerservice@swartland.co.za(customerservice@swartland.co.za)	Transferred	25/10/2018 12:01	2.0.0 message relayed
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BC: bongani.dilima@transnet.net(bongani.dilima@transnet.net)	Transferred	25/10/2018 12:01	2.0.0 message relayed
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BC: wayne.glossop@wartsila.com(wayne.glossop@wartsila.com)	Delivered	25/10/2018 12:03	
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BC: Ck@wcnbc.co.za(Ck@wcnbc.co.za)	Undeliverable	25/10/2018 12:02	
 wessa.co.za	Transferred	25/10/2018 12:01	
BC: morgan.griffiths@wessa.co.za(morgan.griffiths@wessa.co.za)	Delivered	25/10/2018 12:01	
 westcoastway.co.za	Transferred	25/10/2018 12:01	
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BC: Adri.lameyer@westerncape.gov.za(Adri.lameyer@westerncape.gov.za)	Transferred	25/10/2018 12:02	2.0.0 message relayed
BC: ehanekom@westerncape.gov.za(ehanekom@westerncape.gov.za)	Transferred	25/10/2018 12:02	2.0.0 message relayed
BC: Gerhard.Gerber@westerncape.gov.za(Gerhard.Gerber@westerncape.gov.za)	Transferred	25/10/2018 12:01	2.0.0

Draft Scoping Report (v2) for GreenTech in Zone 2 of the Atlantis Special Economic Zone,
Atlantis Industrial, Western Cape

a)		8 12:02	message relayed
BC: jacqui.gooch@westerncape.gov.za(jacqui.gooch@westerncape.gov.za)	Transferred	25/10/2018 12:02	2.0.0 message relayed
BC: Mische.engelbrecht@westerncape.gov.za(Mische.engelbrecht@westerncape.gov.za)	Transferred	25/10/2018 12:02	2.0.0 message relayed
BC: tammy.christie@westerncape.gov.za(tammy.christie@westerncape.gov.za)	Transferred	25/10/2018 12:02	2.0.0 message relayed
BC: Taryn.Dreyer@westerncape.gov.za(Taryn.Dreyer@westerncape.gov.za)	Transferred	25/10/2018 12:02	2.0.0 message relayed
BC: Waseef.dhansay@westerncape.gov.za(Waseef.dhansay@westerncape.gov.za)	Transferred	25/10/2018 12:02	2.0.0 message relayed
BC: Wilna.kloppers@westerncape.gov.za(Wilna.kloppers@westerncape.gov.za)	Transferred	25/10/2018 12:02	2.0.0 message relayed
BC: zwelibanzi.shiceka@westerncape.gov.za(zwelibanzi.shiceka@westerncape.gov.za)	Transferred	25/10/2018 12:02	2.0.0 message relayed
 wwf.org.za	Transferred	25/10/2018 12:01	
BC: nwilson@wwf.org.za(nwilson@wwf.org.za)			

**Proof of Delivery of hard copies of the pre-application Draft Scoping Report to key authorities
(Courier Waybills and Receipt of Hard Copy)**

		HEAD OFFICE: 011 922 2600 www.globoflight.com Reg. No. 1998/009052/07 / VAT NO: 4650175351				2719404416		
DATE	ACCOUNT NUMBER	COST CENTRE	SHIPPER'S REFERENCE	ORIGIN	DESTINATION	No. OF PIECES	ACTUAL WEIGHT	
24-10-18	P01521		EM50147/RW 02100/021 SE			1	1,65	
SHIPPER: (YOUR NAME) K. Stroebel			TO: (RECIPIENT'S NAME) Zaahir Toefy				PIECES	DIMENSIONS
COMPANY NAME: CSIR - STELLENBOSCH			COMPANY NAME: Dept of Env Affairs + Deupmt Planning				1	40x30x5
STREET ADDRESS: 11 JAN CILLIERS STR			STREET ADDRESS: Att: Dir: Development Management (Region 1)					X X
CITY: STELLENBOSCH			CITY: 1st Floor Utilitas Building					X X
CAPE TOWN			Cape Town					X X
COUNTRY: RSA			COUNTRY: S.A.					X X
POST/ZIP CODE: 7599			POST/ZIP CODE: 8001				IMPORT & EXPORT CODE	
TELEPHONE NUMBER & E-MAIL: 021 888 2400			TELEPHONE NUMBER & E-MAIL: 021-4832700				SPECIAL INSTRUCTIONS	
INTERNATIONAL SERVICES	GLOBAL DOCUMENT EXPRESS	OVERNIGHT EXPRESS	<input checked="" type="checkbox"/>	SAME DAY				
	GLOBAL PARCEL EXPRESS	IN CITY DELIVERY		DAWN DELIVERY BY 09H00				
	SPECIALS	BUDGET CARGO 21-48 HRS		SATURDAY DELIVERY				
	AIRFREIGHT	ROAD FREIGHT 48-96 HRS		AFTER HOURS				
	CROSS BORDER ROAD FREIGHT			PUBLIC HOLIDAY				
CUSTOMS VALUE		WE HAVE SEEN AND AGREE TO THE STANDARD CONDITIONS OF CARRIAGE OF GLOBEFLIGHT WORLDWIDE EXPRESS		RECEIVED BY GLOBEFLIGHT WORLDWIDE EXPRESS		RECEIVED IN GOOD ORDER AND CONDITION		
		PRINT NAME: A TAYLOR		PRINT NAME: Shawn		DESCRIPTION OF CONTENTS		
HAZARDOUS CARGO? YES <input type="checkbox"/> NO <input type="checkbox"/>		SIGNATURE: <i>A Taylor</i>		SIGNATURE: <i>Shawn</i>		Documents		
INSURANCE YES <input type="checkbox"/> NO <input type="checkbox"/>		DATE: 24-10-18 TIME:		DATE: 25/10/18 TIME: 10:12				
AMOUNT:								

Globoflight reserves the right to choose the service "Budget" should no service label be selected. Please note indemnity clause in Terms & Conditions.

		HEAD OFFICE: 011 922 2600 www.globoflight.com Reg. No. 1998/009052/07 / VAT NO: 4650175351				2719404418		
DATE	ACCOUNT NUMBER	COST CENTRE	SHIPPER'S REFERENCE	ORIGIN	DESTINATION	No. OF PIECES	ACTUAL WEIGHT	
24-10-18	P01521		EM50147/RW 02100/021 SE			1	0,75	
SHIPPER: (YOUR NAME) K. Stroebel			TO: (RECIPIENT'S NAME) Rhett Smart				PIECES	DIMENSIONS
COMPANY NAME: CSIR - STELLENBOSCH			COMPANY NAME: Cape Nature				1	40x30x2
STREET ADDRESS: 11 JAN CILLIERS STR			STREET ADDRESS: Assegai Bosch Nature Reserve					X X
CITY: STELLENBOSCH			CITY: Jonkershoek P.O. BOX					X X
CAPE TOWN			Stellenbosch					X X
COUNTRY: RSA			COUNTRY: S.A.					X X
POST/ZIP CODE: 7599			POST/ZIP CODE: 7599				IMPORT & EXPORT CODE	
TELEPHONE NUMBER & E-MAIL: 021 888 2400			TELEPHONE NUMBER & E-MAIL: 021 - 866 8017				SPECIAL INSTRUCTIONS	
INTERNATIONAL SERVICES	GLOBAL DOCUMENT EXPRESS	OVERNIGHT EXPRESS	<input checked="" type="checkbox"/>	SAME DAY				
	GLOBAL PARCEL EXPRESS	IN CITY DELIVERY		DAWN DELIVERY BY 09H00				
	SPECIALS	BUDGET CARGO 21-48 HRS		SATURDAY DELIVERY				
	AIRFREIGHT	ROAD FREIGHT 48-96 HRS		AFTER HOURS				
	CROSS BORDER ROAD FREIGHT			PUBLIC HOLIDAY				
CUSTOMS VALUE		WE HAVE SEEN AND AGREE TO THE STANDARD CONDITIONS OF CARRIAGE OF GLOBEFLIGHT WORLDWIDE EXPRESS		RECEIVED BY GLOBEFLIGHT WORLDWIDE EXPRESS		RECEIVED IN GOOD ORDER AND CONDITION		
		PRINT NAME: A TAYLOR		PRINT NAME: Rhett		DESCRIPTION OF CONTENTS		
HAZARDOUS CARGO? YES <input type="checkbox"/> NO <input type="checkbox"/>		SIGNATURE: <i>A Taylor</i>		SIGNATURE: <i>Rhett</i>		Documents		
INSURANCE YES <input type="checkbox"/> NO <input type="checkbox"/>		DATE: 24-10-18 TIME:		DATE: 25/10/18 TIME: 11:12				
AMOUNT:								

Globoflight reserves the right to choose the service "Budget" should no service label be selected. Please note indemnity clause in Terms & Conditions.

Draft Scoping Report (v2) for GreenTech in Zone 2 of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

		HEAD OFFICE: 011 922 2600 www.globeflight.com Reg. No. 1998/009052/07 / VAT NO: 4650175351				2719404419	
DATE	ACCOUNT NUMBER	COST CENTRE	SHIPPER'S REFERENCE	ORIGIN	DESTINATION	No. OF PIECES	ACTUAL WEIGHT
24-10-18			EM50147/RUN 02100/021 SE			1	0,80
SHIPPER: (YOUR NAME)		TO: (RECIPIENT'S NAME)				PIECES	
K. Stroebel		Adri La Meyer				DIMENSIONS	
COMPANY NAME:		COMPANY NAME:				1 40x30x2	
STREET ADDRESS:		STREET ADDRESS:				X X	
LLENBOSCH		Dept of Env Affairs + Developm Planning				X X	
11 JAN CILLIERS STR		11th Floor, Dorp Street				X X	
CITY:		CITY:				X X	
STELLENBOSCH		Cape Town				X X	
COUNTRY:		COUNTRY:				X X	
S.A.		S.A.				X X	
POST/ZIP CODE:		POST/ZIP CODE:				IMPORT & EXPORT CODE	
7599		8001					
TELEPHONE NUMBER & E-MAIL:		TELEPHONE NUMBER & E-MAIL:				SPECIAL INSTRUCTIONS	
021-836 2400		021-483 2887					
INTERNATIONAL SERVICES		DOMESTIC SERVICES		DOMESTIC SERVICES		DESCRIPTION OF CONTENTS	
GLOBAL DOCUMENT EXPRESS		OVERNIGHT EXPRESS <input checked="" type="checkbox"/>		SAME DAY		Documents	
GLOBAL PARCEL EXPRESS		IN CITY DELIVERY		DAWN DELIVERY BY 09H00			
SPECIALS		BUDGET CARGO 21-48 HRS		SATURDAY DELIVERY			
AIRFREIGHT		ROAD FREIGHT 48-96 HRS		AFTER HOURS			
CROSS BORDER ROAD FREIGHT				PUBLIC HOLIDAY			
CUSTOMS VALUE		WE HAVE BEEN AND AGREE TO THE STANDARD CONDITIONS OF CARRIAGE OF GLOBEFLIGHT WORLDWIDE EXPRESS PRINT NAME: A TAYLOR		RECEIVED BY GLOBEFLIGHT WORLDWIDE EXPRESS PRINT NAME: Sharon			
HAZARDOUS CARGO? YES <input type="checkbox"/> NO <input type="checkbox"/>		SIGNATURE: <i>A Taylor</i>		SIGNATURE: <i>Sharon</i>			
INSURANCE YES <input type="checkbox"/> NO <input type="checkbox"/>		DATE: 24-10-18 TIME:		DATE: 25/10/18 TIME: 10:02			
AMOUNT:							

GlobeFlight reserves the right to choose the service "Budget" should no service label be selected. Please note indemnity clause in Terms & Conditions.

**Follow-up Reminder Email sent to I&APs and Stakeholders on 21 November 2018
during the 30-day review of the pre-application Draft Scoping Report**

From: Kelly Stroebel
To: BC dominic.goncalves@abengoa.com; david@atlanticep.com; des@atlanticep.com; sonia@atlanticep.com; af-info@atlantisfoundries.com; carl@awk.co.za; Barnett@capeaction.org.za; aduffell-canham@capenature.co.za; rsmart@capenature.co.za; Susan.moodell@capetown.gov.za; anton.groenewald@capetown.gov.za; Barbara.Rass@capetown.gov.za; bernadette.leroux@capetown.gov.za; bongani.mnisi@capetown.gov.za; candice.haskins@capetown.gov.za; charline.mckie@capetown.gov.za; city.manager@capetown.gov.za; Cynthia.Clayton@capetown.gov.za; lan.Gildenhuys@capetown.gov.za; japie.hugo@capetown.gov.za; Justin.Basson@capetown.gov.za; morne.theron@capetown.gov.za; Pat.titmus@capetown.gov.za; Peter.flower@capetown.gov.za; Sally.chambers@capetown.gov.za; Stanley.Visser@capetown.gov.za; Tania.lewis@capetown.gov.za; Antoinette@cl2cape.co.za; Duduzile.Kunene@dmr.gov.za; mmachakat@dwa.gov.za; BarryP@dws.gov.za; AndreR@elsenburg.com; nnana.direro@energy.gov.za; DRamalope@environment.gov.za; hbezuidenhout@environment.gov.za; TKhumalo@environment.gov.za; Wlutsch@environment.gov.za; coetzeeh@eskom.co.za; Hannes.coetzee@eskom.co.za; henk.landman@eskom.co.za; John.geeringh@eskom.co.za; Koopmans@eskom.co.za; LandmaHJ@eskom.co.za; maraisr@eskom.co.za; MdingiS@eskom.co.za; Riaan.smit@eskom.co.za; ronald.marais@eskom.co.za; smitr@eskom.co.za; Stephen.koopman@eskom.co.za; megand@ewt.org.za; zubeida@flexoline.co.za; Ferdi@globesight.co.za; francis@green-cape.co.za; mike@greencape.co.za; thabo@greencape.co.za; craig.morkel@ikapa-energy.co.za; ssmith@insimbi-alloys.co.za; info@krf.golden-era.co.za; keithbharrison@lando.co.za; bertus@mulilo.com; jannie@mulilo.com; thembani.bukula@nersa.org.za; Kleinhansm@nra.co.za; Sferreir@pgwc.co.za; Xenthia.Smith@pgwc.gov.za; careline@promael.co.za; lbruiners@ruraldevelopment.gov.za; jlavin@sahra.org.za; melodiem@sanparks.org; busiswa@sarebi.co.za; jane@sarebi.co.za; esca.coetzee@sasol.com; info@skywardwindows.co.za(...)
Date: 21/11/2018 16:08
Subject: REMINDER: Notification of EIA process and DSR for public review - Atlantis GreenTech Project
Attachments: CSIR Letter to I&APs_GreenTech DSR_Oct2018.pdf

Dear Stakeholder,

Please be reminded that the public comment period for the below-mentioned project ends on Monday 26th November 2018. If you have not done so already, please submit all comments on or before that date to the project manager outlined in the email and attached letter.

Kind Regards,

Kelly Stroebel
Environmental Assessment Practitioner (EAP)
CSIR Stellenbosch

kstroebel@csir.co.za
Tel. : 021 888 2432
PO Box 320, Stellenbosch, 7599

>>> Kelly Stroebel 25/10/2018 12:01 >>>

Dear Stakeholder,

RE:RELEASE OF DRAFT SCOPING REPORT FOR COMMENT: Proposed GreenTech PROJECT in Zone 2 of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

Please see attached letter notifying you of the release of the Draft Scoping Report for the above-mentioned project for a 30 day public review period in terms of the National Environmental Management Act (Act 107 of 1998, as amended) (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations promulgated in Government Gazette 40772 and Government Notice (GN) R327, R326, R325 and R324 as amended on 7 April 2017.

The review period will run from 25th October 2018 to the 26th November 2018. Please submit all comments by that date using the contact details contained within the attached letter. Hard copies of the Draft Scoping Report are available for public viewing at the Avondale Library (Grosvenor Ave, Avondale, Western Cape). The Draft Scoping Report can also be downloaded from the following website:

<https://www.csir.co.za/environmental-impact-assessment>

Please feel free to contact the undersigned should you have any queries relating to the above.

Kind Regards,

Kelly Stroebel
Environmental Assessment Practitioner (EAP)
CSIR Stellenbosch

kstroebel@csir.co.za
Tel. : 021 888 2432
PO Box 320, Stellenbosch, 7599

Copies of comments received from I&APs on the pre-application Draft Scoping Report (October 2018)



**DIRECTORATE: DEVELOPMENT MANAGEMENT
REGION 1**

REFERENCE NUMBER: 16/3/3/6/7/2/A1/2/3316/18
ENQUIRIES: Ms. M. Schippers
DATE OF ISSUE: 2018 -11- 0 1

The Municipal Manager
City of Cape Town
Private Bag X9181
CAPE TOWN
8001

For Attention: Mr. A. A. Human

Tel: (021) 400 2366
Fax: (021) 419 5303

Dear Sir

ACKNOWLEDGEMENT OF THE NOTICE OF INTENT TO SUBMIT AN APPLICATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) ("NEMA") ENVIRONMENTAL IMPACT ASSESSMENT ("EIA") REGULATIONS, 2014 (AS AMENDED) AND THE DRAFT SCOPING REPORT ("SR") FOR THE PROPOSED CLEARANCE OF INDIGENOUS VEGETATION FOR THE DEVELOPMENT OF MANUFACTURING FACILITIES AND ASSOCIATED INFRASTRUCTURE FOR THE RENEWABLE ENERGY SECTOR ON A PORTION OF THE REMAINDER OF ERVEN 277, 246, 254 AND 171, ATLANTIS.

Your Notice of Intent ("NOI") dated 24 October 2018 and the draft SR dated October 2018, received by this Department on 25 October 2018, refers.

1. This letter serves as an acknowledgement of receipt of the aforementioned documents by this Directorate.
2. Your attention is drawn to Regulation 3(2) of the NEMA EIA Regulations, 2014 (as amended) which states "For any action contemplated in terms of these Regulations for which a timeframe is prescribed, the period of 15 December to 5 January must be excluded in the reckoning of days."
3. *Applicable listed activities*
 - 3.1. The onus is on the applicant to ensure that all of the applicable listed activities are applied for and assessed as part of the EIA process. Only those activities applied for shall be considered for authorisation.
 - 3.2. A Scoping and Environmental Impact Reporting Process must be followed in order to apply for environmental authorisation.
4. The Scoping Report must contain all the information requirements outlined in Appendix 2 of the NEMA EIA Regulations, 2014 (as amended).

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5. *Screening Report*

Based on the Screening Tool developed by the National Department of Environmental Affairs (Screening Report herewith attached as Appendix A) the proposed site is located within a very high sensitivity area from a terrestrial biodiversity perspective, the site is located on land with a medium to high agricultural capability, a low sensitivity area from an aquatic biodiversity perspective and a medium sensitivity area from an archaeological and cultural heritage perspective. Please note that the screening report must be considered as part of the Environmental Impact Assessment Process. Further, the screening report has identified a number of specialist studies to be conducted. It is the responsibility of the Environmental Assessment Practitioner to confirm whether these specialist studies will be conducted or provide a motivation as to why the specialist studies will not be conducted as part of the EIA process.

6. *Exemptions*

The Directorate notes that you do not intend to apply for exemption from any provisions contained in the NEMA EIA Regulations, 2014 (as amended) or the NEMA. Please note that should exemption from any provisions contained in the NEMA EIA Regulations, 2014 (as amended) or the NEMA be required, an exemption application must be submitted and the exemption process must be finalised before submitting an application for Environmental Authorisation to the competent authority.

7. *Alternatives*

Be advised that in terms of the NEMA EIA Regulations, 2014 (as amended) and the NEMA the investigation of alternatives is mandatory. All alternatives identified must therefore be investigated to determine if they are feasible and reasonable. In this regard it must be noted that the Department may grant authorisation for an alternative as if it has been applied for or may grant authorisation in respect of all or part of the activity applied for as specified in Regulation 24 of the NEMA EIA Regulations, 2014 (as amended). Alternatives are not limited to activity alternatives, but include layout alternatives, design, activity, operational and technology alternatives. Every EIA process must therefore identify and investigate alternatives, with feasible and reasonable alternatives to be comparatively assessed. If, however, after having identified and investigated alternatives, no feasible and reasonable alternatives were found, no comparative assessment of alternatives, beyond the comparative assessment of the preferred alternative and the "no-go" alternative, is required during the assessment. What would, however, be required in this instance is proof of the investigation undertaken and motivation indicating that no reasonable or feasible alternatives other than the preferred and the "no-go" alternatives exist.

8. *Public Participation*

- 8.1. You are advised that public participation may be undertaken prior to the submission of the application. However, public participation must comply with the requirements of Regulation 41(2) of the NEMA EIA Regulations, 2014 (as amended).
- 8.2. Please be advised that the requirements of the public participation process ("PPP") are specified in Regulation 41(2) of the NEMA EIA Regulations, 2014 (as amended).
- 8.3. The SR must be made available to the Interested and Affected Parties ("I&APs"), including all the relevant State Departments that administer laws relating to a matter affecting the environment, for **comment for a period of 30 days**.
- 8.4. In terms of good environmental practice you are encouraged to engage with State Departments and other Organs of State in the pre-application phase to solicit their inputs on any of their requirements to be addressed in the EIA process. Please note that this does not replace the requirement of making the SR available to State Departments as stipulated above.

9. *Need and Desirability*

In terms of the NEMA EIA Regulations, 2014 (as amended), when considering an application, this Directorate must take into account a number of specific considerations including, *inter alia*, the need for and desirability of any proposed development. As such, the need for and desirability of the proposed activity must be considered and reported on in the SR. The SR must reflect how the strategic context of the site in relation to the broader surrounding area, has been considered in addressing need and desirability.

10. *Climate change: Energy efficiency/water saving*

One of the objectives of the Western Cape Provincial Spatial Development Framework published by this Department is to minimise the consumption of scarce environmental resources such as water, fuel, building materials, mineral resources, electricity and land. To this effect and as part of the efforts to reduce the effects of climate change, you must, as part of the EIA process, identify energy efficient technologies (e.g. the use of low voltage or compact fluorescent lights instead of incandescent globes, maximising the use of solar heating, etc.) that could be implemented for the proposed development. Considering that South Africa is a water scarce country and that many catchments in the Western Cape are already water stressed, you must also consider implementing the use of water saving devices and technologies (e.g. dual flush toilets, low-flow shower heads and taps, etc.) for the proposed development.

11. *General*

- 11.1. In addition to the above requirements, you must clearly show how the proposed development complies with the principles contained in Section 2 of the NEMA and must also show how the proposed development meets the requirements of sustainable development.
 - 11.2. You are reminded that the social context of the proposed development must always be considered. This includes the impact that the proposed development may have on the prevalence of HIV/AIDS, sexually transmitted infections (STI) and Tuberculosis (TB), as well as equity and gender related concerns.
 - 11.3. You are hereby advised that the SR must contain all the information outlined in Appendix 2 of the NEMA EIA Regulations, 2014 (as amended), and must also include the information requested in this letter. Omission of any of the said information may result in the refusal of Environmental Authorisation.
12. Please note that the pre-application consultation is an advisory process and does not pre-empt the outcome of any future application which may be submitted to the Department. No information provided, views expressed and/or comments made by officials during the pre-application consultation should in any way be seen as an indication or confirmation:
- that additional information or documents will not be requested; or
 - of the outcome of the application.

Kindly quote the above-mentioned reference number in any future correspondence in respect of the pre-application.

Please note that the activity may not commence prior to obtaining an environmental authorisation from the competent authority. It is an offence in terms of Section 49A of the NEMA for a person to commence with a listed activity unless the Department has granted an Environmental Authorisation for the undertaking of the activity.

The Department reserves the right to revise its comments and request further information based on any information received.

Yours faithfully



HEAD OF DEPARTMENT

Copies to: (1) Ms. K. Stroebel (CSIR)
(2) Ms. P. Tilmuss (City of Cape Town)

Fax: (021) 888 2472
Fax: (021) 444 0605

REFERENCE NUMBER: 16/3/3/6/7/2/A1/2/3316/18

Page 3 of 4

APPENDIX A

Screening Report



DIRECTORATE: DEVELOPMENT MANAGEMENT
REGION 1

REFERENCE NUMBERS: 16/3/3/6/7/2/A1/2/3316/18
ENQUIRIES: Ms. M. Schippers
DATE OF ISSUE: 2018 -11- 19

The Municipal Manager
City of Cape Town
Private Bag X9181
CAPE TOWN
8001

Attention: Mr. A. A. Human

Tel: (021) 400 2366
Fax: (021) 419 5303

Dear Sir

COMMENT ON THE PRE-APPLICATION DRAFT SCOPING REPORT ("SR") FOR THE PROPOSED CLEARANCE OF INDIGENOUS VEGETATION FOR THE DEVELOPMENT OF MANUFACTURING FACILITIES AND ASSOCIATED INFRASTRUCTURE FOR THE RENEWABLE ENERGY SECTOR ON A PORTION OF THE REMAINDER OF ERVEN 277, 246, 254 AND 171, ATLANTIS.

The draft SR dated October 2018, received by this Department on 25 October 2018, and the acknowledgement thereof dated 01 November 2018, refer.

1. Screening Report

- 1.1. As indicated in this Directorate's acknowledgement of the Notice of Intent and the draft SR (dated 01 November 2018, based on the Screening Tool developed by the National Department of Environmental Affairs ("DEA")), the proposed site is located within a very high sensitivity area from a terrestrial biodiversity perspective, on land with a medium to high agricultural capability, in a low sensitivity area from an aquatic biodiversity perspective and in a medium sensitivity area from an archaeological and cultural heritage perspective. The proposed site is also located within 8km of a civil aviation aerodrome.
- 1.2. Please note that the screening report must be considered as part of the Environmental Impact Assessment ("EIA") Process.
- 1.3. Further, the screening report has identified a number of specialist studies to be conducted. The Environmental Assessment Practitioner must confirm whether these specialist studies will be conducted or provide a motivation as to why the specialist studies will not be conducted as part of the EIA process.

2. Laydown area

- 2.1. Page 2-12 of the draft SR states, "*The laydown area will either be located adjacent to or at the project site. The laydown area is expected to cover a maximum area of 1ha.*"
- 2.2. Please be advised that locating the laydown area adjacent to the proposed site means that this area must also be assessed as part of the EIA process.

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3. Other legislation

3.1. It is not clear, based on the information as contained in the draft SR, as to whether a Notice of Intent to Develop ("NID") was submitted to Heritage Western Cape ("HWC"). However, the Plan of Study indicates that a Heritage Impact Assessment will be conducted.

3.2. Please note that a NID must be submitted and confirmation must be obtained from HWC as to whether a Heritage Impact Assessment will be required.

4. Need and Desirability

4.1. It is noted that this Department's 2010 Guideline on Need and Desirability has been used to describe the need and desirability for the proposed development.

4.2. Please note that the latest guidelines to describe the need and desirability for the proposed development must be used. In this regard, this Department's 2013 Guideline on Need and Desirability or the Department of Environmental Affairs Integrated Environmental Management Guideline on Need and Desirability (dated March 2017) must be used to describe the need and desirability for the proposed development.

4.3. An updated description of the need and desirability must be included in the SR to be circulated as part of the application phase public participation process.

5. Service confirmation

5.1. In light of the water crisis currently being experienced in the City of Cape Town, confirmation that sufficient, spare, unallocated water is available to accommodate the proposed development must be included in the EIA report. You are advised to obtain this confirmation as early as possible and already include it in the application phase SR if available.

5.2. In addition to the above, confirmation that sufficient, spare, unallocated capacity to provide services such as electricity, solid waste management, the treatment and disposal of sewage and stormwater management must be included in the EIA report.

Please note that the activity may not commence prior to an Environmental Authorisation being obtained from the competent authority.

This Directorate reserves the right to revise or withdraw comments or request further information based on any information received.

Your interest in the future of our environment is greatly appreciated.

Yours faithfully


HEAD OF DEPARTMENT

Copies to: 1) Ms. P. Tilmuss (City of Cape Town)
2) Ms. K. Stroebel (CSIR)
3) Ms. K. Rughoobee (DEA&DP:DDF)

Fax: (021) 444 0605
Fax: (021) 888 2472
Fax: (021) 483 8311



Morné Theron

Senior Environmental Professional
Environmental & Heritage Management Branch
Environmental Management Department

T +27 21 444 0601
E morne.theron@capetown.gov.za

22 November 2018

CSIR Environmental Management Services
P.O. Box 320
STELLENBOSCH
7599

Attention: Mrs Kelly Stroebe!

[e-mail: kstroebe!@csir.co.za]

Dear Madam

REMAINDER ERF 277, ERF 246, ERF 254 and PORTION of REMAINDER 171, ATLANTIS INDUSTRIAL – PROPOSED GREEN TECHNOLOGY MANUFACTURING FACILITY – DRAFT SCOPING REPORT
[City Reference: BA21/1/2/2/281]
[DEA&DP Reference: Unspecified]

The abovementioned draft Scoping report (DSR), dated October 2018, refers.

The City of Cape Town collated comment on the report is as follows:

1. TRANSPORT DEVELOPMENT AUTHORITY (TDA): Urban Planning & Mechanisms (Urban Integration)

1.1 Chapter 2, Project Description: Section 2.3 Components of a Greentech Facility (Page 2-6): Paragraph 2 erroneously makes reference to "General Residential". It should read "General Industrial". This error is also repeated on page 5-6 (Chapter 5: Layout alternatives).

1.2 Chapter 2, Project Description: Section 2.3 Components of a Greentech Facility, Table 2.3 (Page 2-7): The primary uses in the General Industrial 1 (GI1) zone have been expanded and the Primary land uses on Table 2.3 must be updated to include the following:

Industry, restaurant, service station, motor repair garage, funeral parlour, scrap yard, authority use, utility service, crematorium, rooftop base tele-communication station, freestanding base telecommunication station, transport use, multiple parking garage, agricultural industry, private road, open space, additional use rights, veterinary practice and filming [Source: City of Cape Town Municipal Planning By-Law[MPBL], 2015].

Updates on the MPBL can be obtained from:

<http://www.capetown.gov.za/Work%20and%20business/Planning-portal/Regulations-and-legislations/Planning-by-law>

2. TRANSPORT DEVELOPMENT AUTHORITY (TDA): Environmental Management Department

2.1 For ease of reference please reflect the subject even number on the cover page of the scoping report, as well as the draft EMPr (once available).

2.2 Reference (e.g. footnote) when the Atlantis Special Economic Zone (SEZ) was adopted in the Executive Summary (page 3) and Chapter 2, Section 2.1 (page 2-3).

2.3 Executive Summary (page 6) erroneously states the Plan of Study appears in Chapter 8. Correct to Chapter 7.

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PO Box 35, Milnerton, 7435

Iziko loLuntu Milnerton
87 Pienaar Road, Milnerton, 7441
PO Box 35, Milnerton, 7435

Burgersentrum Milnerton
Pienaarweg 87, Milnerton, 7441
Posbus 35, Milnerton, 7435

- 2.4 Chapter 2, Section 2.1 (page 2-3): Atlantis Special Economic Zone (page 2-3): Spelling error 'Sepcial' to be 'Special'.
- 2.5 Chapter 3, Section 3.2 Preliminary Sensitivity Screening (page 3-3): The report mentions that the proposed development is located 8km from Camphill Conservation Area but fails to mention that it is 800m from Witzands Aquifer Nature Reserve (located to the north and west). In addition although the Dassenberg Coastal Catchment Partnership (DCCP) is mentioned in Appendix C no mention of the DCCP is made in the report. The DCCP is a landscape conservation initiative and multi stakeholder partnership identified on the basis of extremely high biodiversity value, water security (overlays the Atlantis Aquifer), priority provincial (one of two most important) climate change adaptation and mitigation corridor and socio-economic opportunities.
- 2.6 Chapter 3, Section 3.3.7 Terrestrial Environment: Protected Areas (pages 3-10): The various mentioned nature reserves' correct names must be reflected as follow:
- 2.6.1 The *Camphill Private Nature Reserve* correct name is the *Camphill Conservation Area*.
- 2.6.2 *White sands Aquifer Protected Area* should be correctly named as the *Witzands Aquifer Nature Reserve* and *Koeberg Private Nature Reserve* should read *Koeberg Nature Reserve*.
- 2.6.3 The *Pela (Pella) Nature Reserve* is part (a section) of the *Riverlands Nature Reserve*.
[Note: All the above areas, except the *Camphill Conservation Area*, and including *Bugerspost* and *Groenfontyn* form part of the *Dassenberg Coastal Catchment Partnership*.
- 2.7 Chapter 3, Section 3.3.8 Threatened Ecosystems (page 3-11) – This section refers to the *Atlantis Industrial Incentive Scheme*, however the *Atlantis Industrial Incentive Scheme* is not also termed a *Land Banking Mechanism* as mentioned in the report. Be advised that there are various incentives that are part of the *Atlantis Industrial Incentive scheme*, the land banking component is just one of these incentives that aim to attract development to the Atlantis area. Furthermore it is not only one property that has been purchased for this purpose (e.g. To date 14 properties have been purchased totalling 940 hectares in order to compensate for the potential loss of indigenous vegetation within the Atlantis Industrial area). The opinion is held that the entire Section 3.3.8 of the DSR requires a rewrite as explained under points 2.12 and 2.13 below.
- 2.8 The DSR should acknowledge that this development falls within the Atlantis Aquifer protection zone (zones 2 and 3).
- 2.9 Chapter 6: Potential Environmental Impacts, Table 6.1 (page 6-5): The *Significance of Impact* rating pertaining to the loss of 32.6 ha Endangered Strandveld of international significance is 'High' not 'Moderate' (Also refer to paragraph two on page 6-8 on the DSR in this regard).
- 2.10 Chapter 7: Plan of Study, Table 7.4 (page 7-9): Two acronyms are used CFDS and ASF, which presumably refers to Cape Flats Dune Strandveld (CFDS) and Atlantis Sand Fynbos (ASF). If so please type out the full name.
- 2.11 Chapter 7: Plan of Study, Table 7.6 (page 7-11): Spelling error 'Lisrt' to be 'List'.
- 2.12 Further to Chapter 3, Section 3.3.8, the Chapter 6, Section 6.2.5 *Cumulative Impacts* and Appendix C: *Biodiversity offset Information* sections of the DSR requires a complete rewrite. It is appreciated that the CSIR tried to demonstrate to the Competent Authority that the proposed project qualifies for the Atlantis Industrial Incentive Scheme. However the arguments put forward in the DSR illustrates that the CSIR clearly misunderstand how the Atlantis Industrial Incentive Scheme works. In addition the Integrated Reserve Management Plan for the Klein Dassenberg Nature reserve (Annexure C) cannot be argued as a 'biodiversity offset' as stated by the CSIR.
- For ease of reference in order to redraft Sections 3.3.8 and 6.2.5 of the DSR kindly peruse the information sheet entitled: *Atlantis Biodiversity Incentives – Development facilitation through land banking* (attached as Annexure A). For further clarification it is suggested the CSIR liaise directly with the City of Cape Town: Environmental Management Department (Tel: 021 444 0601)
- 2.13 In the event of the Atlantis Industrial Incentive Scheme being utilized, it would be more relevant to stipulate the following in the future EIA report(s):

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Burgersentrum Milnerton
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Posbus 35, Milnerton, 7435

- The proposed New GreenTech Project falls within the urban edge of the Atlantis Industrial Area and will account for the loss of 32.6 hectares of Endangered Cape Flats Dune Strandveld.
 - The proposed development area is highlighted on the City of Cape Town: Biodiversity Network Map (2018) as "Other Natural Area".
 - A biodiversity off-set in accordance with the Land Bank of the Atlantis Industrial Incentive Scheme is proposed to the Competent Authority. The offset land proposed measures 32.6 hectares. As such it is proposed to the Competent Authority that an offset ratio of 1:1 is applied in order to mitigate for the loss of this significant area of Cape Flats Dune Strandveld.
 - In addition to the proposed utilization of the Atlantis Industrial Incentive Scheme at a ratio of 1:1, the following proposed conditions are required:
 - o Search & rescue of all translocatable species prior to the commencement of construction; and
 - o Following the final decision by the Competent Authority, the developer must give the City of Cape Town: Biodiversity Management Branch and Cape Nature a minimum three (3) months' notice prior to the commencement of construction, in order for search & rescue to be completed in the appropriate season.
- 2.14 Be advised that the Klein Dassenberg Nature Reserve: Integrated Reserve Management Plan (October 2014) was compiled by the City of Cape Town: Biodiversity Management Branch. If the CSIR wish to utilize the document in their report the document's source must be properly referenced/credited.
- 2.15 Appendix B: The database list of City of Cape Town interested & affected personnel (pages 2 and 3) are outdated. Please remove all the listed City of Cape Town personnel and replace with the following singular City of Cape Town entry point for EIAs:

City of Cape Town, Director: Environmental & Heritage Management Department, Milnerton Civic Building, 87 Pienaar Street, Milnerton, 7435 (For Attention: Pat Timuss, Tel: 021 4440598, e-mail: pat.timuss@capetown.gov.za).

3. SPECIALISED ENVIRONMENTAL HEALTH: Air Quality Management Branch

The City's Air Quality Management Branch request further information in terms of the following:

- 3.1 The Branch appreciates the intention of the EIA and the "envelope" format being used to streamline the process.
- 3.1.1 However, as there are three main technology alternatives listed for the proposed future use of the site, it would be appreciated if the production processes of each of the proposed technologies are investigated and detailed in further reporting during the EIA process.
- 3.1.2 In addition to the production processes being explored, further reporting must examine if these processes would result in the need for Atmospheric Emissions Licensing in terms of GN 893, as amended, which is promulgated in terms of the National Environmental Management: Air Quality Act (NEM: AQA).
- 3.1.3 Furthermore, although a requirement for later in the development process, please note that the City of Cape Town's Air Quality Management By-law, 2016, prescribes that fuel burning appliances must be registered, prior to installation and operation. The Branch can be contacted for further information regarding this process.
- 3.2 Should Atmospheric Emissions Licensing be required by the proposed business, and as the land on which the development will take place is City owned land, please stipulate if the City of Cape Town will be the license holder.
- 3.2.1 Should the license holder be deemed to be the City of Cape Town, please note that the licensing authority for activity will be the Western Cape Government.
- 3.2.2 The City of Cape Town: Air Quality Management Branch will however continue to provide comment, where necessary, during the licensing process.

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- 3.3 Furthermore, should the proposed operations include listed activity/ies specified in G.N. R893 of 215, there will be a requirement to conduct specialist air impact studies to determine the impact of the proposed activity on the receiving environment.
- 3.4 It is noted that a potential environmental risk and impact assessment was included in the Scoping report, however, limited air impacts were explored.
- 3.4.1 The full impact of the various stages of the project on air quality must be explored and addressed in further reporting.
 - 3.4.2 The proposed EMPr must provide detail to how each of the proposed air impacts will be addressed and mitigated.
 - 3.4.3 Should the need arise, the City of Cape Town: Air Quality Management Branch may request a further site specific Dust and Odour Management Plan to be submitted for approval by this office prior to commencement of activities on site.
 - 3.4.4 Please note that the burning of felled vegetation will not be permissible within the industrial area and alternative safe disposal methods must be documented.

4. Disaster Risk Management Centre

As mentioned in the DSR the subject even are situated within the 5 – 16km Urgent Protection action planning Zone (UPZ) of the Koeberg Nuclear Power Station (KNPS). The Disaster Risk Management Centre (DRMC) is the custodian (on behalf of the City of Cape Town) for the execution of the Koeberg Nuclear Power Station Radiological Release Hazard Disaster Risk Management Plan (RRR). DRMC is tasked with the responsibility of ensuring that the public safety arrangements are in place in the case of a nuclear emergency, and that individual citizens are not endangered, with particular emphasis on the population residing and working in the UPZ of the 0 – 16km area from the KNPS.

- 4.1 In light of the above an emergency plan must be drafted for all phases of development and operation of the site. The emergency plan must include a risk assessment indicating all relevant hazards and their associated risks.
- 4.2 The requirement that a Koeberg Nuclear Power Station emergency procedure must be developed for the approval by the City of Cape Town: Disaster Risk Management Centre must be included in the EMPr.

The abovementioned comment must be included in the next EIA report. The said report must be submitted to this office in the form of 1 hard copy and 1 electronic CD/flash disk version.

Yours faithfully



PAT TITMUSS

Regional Manager: Environmental Management Department: Environmental & Heritage Management Branch – Northern Region

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ANNEXURE A

ATLANTIS BIODIVERSITY INCENTIVES – DEVELOPMENT FACILITATION THROUGH LAND BANKING

1. Background

Approximately 906 hectares of the vacant land in the Atlantis urban edge and industrial area contains Critically Endangered Atlantis Sand Fynbos or Endangered Cape Flats Dune Strandveld vegetation. The National Environmental Management Act (NEMA) EIA Regulations require that Environmental Authorisation be obtained for the clearance or removal of an area of 300 square metres or more of Endangered or Critically Endangered vegetation. As a result, new developments which contain vegetation remnants in the industrial area or urban edge of Atlantis require a time consuming botanical assessment as part of the EIA process. In addition, the conditions of approval may require costly mitigation measures and offsets to moderate for the loss of biodiversity. This time delay and potential mitigation costs are often viewed as a deterrent to investment and development in Atlantis.

2. Land banking mechanism

In May 2013 Council approved the Atlantis Industrial Incentives Scheme (Report C46/05/13). One of the suite of incentives approved was that of holding land in order to pro-actively provide biodiversity offsets:

Biodiversity offsets	Apply where Environmental impact Authorisation for new development in industrial area requires biodiversity conservation – City holding sufficient land for nature reserve purposes	EESP; ERM department to set procedure by which developer can 'apply' to benefit from off-set land. Also recording mechanism.
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On 18 September 2012 (Item MIC 09/09/12) the Executive Mayor together with the Mayoral Committee resolved that the Dassenberg Coastal Catchment Partnership (DCCP) initiative be recognized and supported as an important multi-stakeholder project that can bring benefits to the region. In August 2014 (MIC 04/08/14) the Executive Mayor together with the Mayoral Committee supported the biodiversity land banking mechanism to mitigate for biodiversity loss and thereby facilitate development within the Urban Edge and industrial area of Atlantis.

The City's pragmatic proposal was that a proactive land bank be established where Critical Biodiversity Areas, outside of the urban edge, are conserved and managed. This land bank can then be used to facilitate the loss of remnant vegetation within the Atlantis Urban Edge. The simple ratio of 1:1 is applied irrespective of vegetation type or condition. This mechanism thereby facilitates development within the Urban Edge and industrial areas of Atlantis without any cost to the developer and without any time delays. The competent authority, the Department of Environmental Affairs & Development Planning (DEA&DP) and CapeNature are both in support of this proactive approach.

The land targeted for acquisition is all Critical Biodiversity Area highlighted on the fine scale conservation plan for the City, the Biodiversity Network (BioNet). The properties contain extremely high quality critically endangered Atlantis Sand Fynbos and Swartland Granite Renosterveld needed for national conservation targets. The properties contain an extraordinary number of threatened plant species. Several of the properties purchased to date comprise of slopes of Kanonkop and the Dassenberg, a significant landscape feature in the area. There are numerous opportunities associated with conserving and utilizing this feature for sustainable recreation activities. All the properties purchased are adjoining and are critical components in the greater landscape initiative known as the Dassenberg Coastal Catchment Partnership.

3. Implementation to date

To date, 11 adjoining properties totaling 873 ha of biodiversity area have been purchased (still awaiting transfer on four properties.) This equates to 96.35% of the natural vegetation in Atlantis with only 33ha needed to complete the land bank. A general biodiversity off-set ledger has been established to keep track of how many hectares of biodiversity have been secured by the City and how many have been transformed by development within Atlantis (Annexure A).

To date, three developments totalling 75 ha have benefited from the land bank. See table 1. An additional seven totalling 68.37 ha of biodiversity area are in process. See table 2. Together, this equates to ten applications totalling 143.37 ha.

Table 1: List of developments which have been facilitated / mitigated for by using the proactive land bank

Development	Details	Area (ha)
Atlantis Green Hub	EIA ref: 16/3/1/1/A1/2/303712 Proposed offset to be confirmed by DEA&DP	68
Portion 4 of Erf 1183 (Electrical Substation)	EIA ref: 16/3/1/1/A1/2/3013/14. Offset (1:1) to be agreed to By CapeNature	2.6
Portion 1 of Erf. 1543 (shopping centre)	Approved. EIA ref: 16/3/1/1/A1/2/3035/14 Offset (1:1) a condition of approval.	4.4
Total:		75

Table 2: List of developments which are in the process of being facilitated / mitigated for by using the proactive land bank

Description	Status	Area (ha)
Portion 1 of Cape Farm 1065 (i.e. New mixed use Industrial/Commercial precinct)	EIR with DEA&DP	20.5
Ptn 212 of Farm 1183 - Mpaet extension	Pre-application phase	0.4
EA for clearing of 5 CCT owned sites before selling	Scoping	24.44
CA4 -69RE	Basic assessment	6.22
CA1183 portion-50	Basic assessment	2.52
CA1183 portion-55:	Basic assessment	4.30
CA1183-162	Basic assessment	9.99
Total:		68.37

4. Additional benefits to date:

In addition, the acquisition of the land has catalysed the creation of EPWP work opportunities. To date, R1 914 778.16 which equates to 14809 person days has been created on the land acquired. Of special note is that fact that R1 296 984.39 of this has come from an external source, the Cape West Coast Biosphere Reserve. These funds would not have been spent in the area had the City not acquired this land. See table 3. All the people employed have been from the surrounding communities of Pella, Mamre and Atlantis and have been selected from the subcouncil indigent lists. The long term environmental education, recreation and tourism benefits of having well managed natural open space in this region will only be realised in the long term. However the immediate EPWP work and training opportunities are already being realised.

Table 3: Job creation opportunities created by the land acquired for the land bank.

	2012-13		2013-14		2014-15		2015/16		TOTAL	
	Budget	Person days	Budget	Person days						
CoCT	R 133 068.77	1593	R 367 068.50	2054	R 66 886.72	170	R 50 769.78	228	R 617 793.77	4045
CWCBR	0	0	R 122 360	1185	R 477 992.62	4078.5	R 696 631.77	5500	R 1 296 984.39	10764
Total	R 133 068.77	R 1 593.00	R 489 428.50	R 3 239.00	R 544 879.34	R 4 248.50	R 747 401.55	R 5 728.00	R 1 914 778.16	14809

The land purchased has long been identified as containing critically important biodiversity. The areas collectively comprise one of the most highly threatened and significant natural areas left in Cape Town. The acquisition and securing of these properties are a great step forward in conserving the City's unique natural heritage. These acquisitions have also resulted in the majority of the significant landscape feature, Kanonkop, being acquired into public ownership. This hill was previously subdivided into several small private properties, and was inaccessible to the public. This feature will now be under City ownership. There are numerous recreational and tourism opportunities that this provides that cannot be facilitated elsewhere in the region.

1. A master site development plan, indicating the phasing of the development plans of the individual sites, is required. Note that the electricity infrastructure serving each erf may not be dedicated to that site alone. Infrastructure such as substation sites may be required to serve a wider area or future phases of the project as well as other adjacent projects.
2. Electricity's standard conditions of supply and fees will apply and will include a connection cost as well as a Shared-Network Charge (SNC) to each erf of the development.
3. The present authorised capacity of the entire development area (Zone 2) is nil. The specified SNC tariffs will be applicable and dependant on the load requirement at the time of application.
4. A supply of up to 2 MVA can readily be made available at 11kV, though this may require the construction of a suitable substation room or building by the developer.
5. Supplies in excess of:
 - 5.1 2 MVA to the entire development, or any further supply applications beyond the 2 MVA, will require the construction of a 33/11kV main substation by the developer on a separate erf. The timeline for design, construction, equipping and commissioning of such a substation is on average 2 years and is dependent on the City's budget allocation.
 - 5.2 7 MVA to the entire development will be provided at 33kV;
 - 5.3 20 MVA to the entire development will be provided at 132kV.

For options 5.2 and 5.3 the developer may be fully cost responsible for the construction and equipping of such substation.

Enquiries regarding Electricity Generation and Distribution Department comments may be directed to Shiraaz Swartland at shiraaz.swartland@capetown.gov.za or to Michael Schmidt at michael.schmidt@capetown.gov.za.

Kindly please ensure that this comment is attached as an addendum to the City comment and addressed in the next EIA report.



SCIENTIFIC SERVICES

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reference SSD14/2/8/1/4/1/171,246,254&277_industrial_Atlantis
date 26 November 2018

CSIR
P.O. Box 320
Stellenbosch
7599

Attention: Kelly Stroebel
By email: kstroebel@csir.co.za

Dear Kelly

Draft Scoping Report for the Proposed Atlantis GreenTech Industrial Development in Zone 2 of the Atlantis Special Economic Zone, Atlantis, Cape Town

CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.

The application area is classified as Other Natural Areas on the Biodiversity Network (BioNet) for the City of Cape Town and the Western Cape Biodiversity Spatial Plan (WCBSP). The natural vegetation occurring on the site is Cape Flats Dune Strandveld, listed as Endangered. No freshwater features are mapped for the site according to the BioNet or NFEPA, however there is a small section of wetland in the north according to the WCBSP wetland layer, which is based on wetland signatures from the land cover layer.

The proposed project forms one of four phases for the Atlantis Special Economic Zone (SEZ) development, with the first phase already approved, as described in the Draft Scoping Report, and with development components already in place. The primary mitigation measure for impacts on terrestrial biodiversity for Phase 1 of the overall development was a biodiversity offset.

The biodiversity offset was however proposed as a cumulative biodiversity offset, for which Phase 1 formed the first component. A conservation bank was initiated which allowed for a receptor area for biodiversity offsets for development within the Atlantis SEZ. CapeNature has been engaged since the initiation of this project.

The integrated reserve management plan (IRMP) for the Klein Dassenberg Nature Reserve has been included as an appendix and is classified as biodiversity offset information. The Klein Dassenberg Nature Reserve is the receptor site for the biodiversity offset, which is the connection to the biodiversity offset. The IRMP in isolation does not however function adequately as a biodiversity offset report as the report focuses on the management interventions of the nature reserve and it is not contextualized in terms of the biodiversity offset.

The Plan of Study for EIA has proposed that an ecological impact assessment must be undertaken for the EIA Phase, which is supported by CapeNature. The ecological impact

The Western Cape Nature Conservation Board trading as CapeNature

Board Members: Prof Denver Hendricks (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Ms Marguerite Bond-Smith, Mr Mervyn Burton, Dr Colin Johnson, Prof Aubrey Reddinghuis, Mr Paul Slack

assessment will need to take into account the cumulative biodiversity offset and recommend any other appropriate mitigation measures. Particular attention should be paid to the presence of threatened species and associated mitigation measures, as the already secured habitat may not compensate for these impacts.

The assumption is made that the ecological impact assessment will focus on terrestrial habitat. Cape Flats Dune Strandveld does tend to contain numerous wetlands, which are often groundwater fed and at a small scale which may not be picked up on desktop mapping. There was additionally evidence of wetland conditions in the northern section as described above. CapeNature therefore recommends that a freshwater specialist scan is included in the EIA Phase. Should any wetlands be identified then a freshwater impact assessment must be undertaken and the relevant listed activities included within the application.

In addition to the above, it is recommended that a biodiversity offset report is included in the EIA Phase. Although the biodiversity offset has already been secured, the biodiversity offset must be placed in context of the development proposal and must demonstrate compliance with the draft provincial biodiversity offset guideline and draft national biodiversity offset policy. The biodiversity offset report will need to demonstrate the key principles of biodiversity offsets, such as the mitigation hierarchy, which would link to the alternatives section in the Draft Scoping Report, as well as an explanation of the offset design in accordance with the policy and guidelines. The designation as an SEZ would be a factor to consider.

CapeNature wishes to highlight that the designation of the project application area in the alternatives section in Figure 5.1 differs from that included within the project description in Figure 2.1. Figure 5.1 includes additional erven to those in Figure 2.1 and the discrepancy needs to be clarified.

In conclusion, CapeNature recommends that the comments above must be taken into consideration and addressed in the EIA Phase of the application.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely



Rhett Smart
For: **Manager (Scientific Services)**

Note: All comments received on the 30-day review of this Draft Scoping Report that is being submitted in conjunction with the Application for EA will be included in the Final Scoping Report that will be submitted to DEA&DP for decision-making.

Scoping and Environmental Impact Assessment (EIA) for GreenTech in Zone 2
of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

DRAFT SCOPING REPORT



APPENDIX E

Comments and Responses Report

COMMENTS AND RESPONSES

This chapter presents the approach to evaluating the issues raised during the Draft Scoping Phase Notice of Intent to Develop (NOI) and provides a summary of all issues which have been raised by I&APs and Organs of State.

IDENTIFICATION OF ISSUES

An important element of the Scoping Process is to evaluate the issues raised through the Scoping interactions with authorities, the public, the specialists on the EIA team and the project proponent. In accordance with the philosophy of Integrated Environmental Management, it is important to focus the EIA on the key issues, such as those issues that are considered critical for decision-making on the EA.

To assist in the identification of key issues, a decision-making process is applied to the issues raised, based on the following criteria:

- Whether or not the issue falls within the scope and responsibility of the proposed project; and
- Whether or not sufficient information is available to respond to the issue raised without further specialist investigation.

Issues were sourced by the EIA team from the following Scoping interactions:

- **Newspaper Advertisements** - In order to inform the public of the proposed project and invite members of the public to register as I&APs, and to inform the EIA consultant about specific issues or interests in the proposed project, the proposed Scoping & EIA Process was advertised in two newspapers (i.e. The Cape times – English, and Die Burger – Afrikaans) on the 25th October 2018 during the Scoping Phase to announce the project and to invite I&APs to comment on the pre-application version of the Draft Scoping Report. A copy of the newspaper advertisements is included in Appendix C of this updated Draft Scoping Report.
- **Site Notices** – Site notices describing the project as well as the contact details of the EAP were placed on site, as seen in Appendix C.
- **Email** - Issues were sent to the CSIR via email correspondence during the 30-day review of the pre-application Draft Scoping Report (copies of the CSIR correspondence in this regard can be seen in Appendix D).

All comments received during the 30-day review of this Draft Scoping Report for I&AP review will be included in the Comments and Responses Table below, as well as in Appendix D of the Final Scoping Report that will be submitted for decision-making. The table below provides a summary of the comments received following the release of the pre-application version of the Draft Scoping Report.

The tables below summarise the comments and/or issues raised following the release of the pre-application version of the Draft Scoping Report for I&AP review, together with a response from the EIA team. Copies of the comments received are included in **Appendix D** of this updated Draft Scoping Report. A synthesis of issues to be addressed in the Specialist Studies is provided in the Plan of Study for EIA (Chapter 7). The results of the Specialist Studies will be made available to I&APs for comment as part of the PPP undertaken for the EIA Report.

Table: Comments received following the release of the pre-application version of the Draft Scoping Report and NOI together with the response from the EIA team

*Please note that the comments are taken verbatim from the comments provided by Interested and Affected Parties

NO.	COMMENTS	COMMENTATOR	DATE	RESPONSE
1.	<p>Your Notice of Intent (“NOI”) dated 24 October 2018 and the draft SR dated October 2018, received by this Department on 25 October 2018, refers.</p> <p>1. This letter serves as an acknowledgement of receipt of the aforementioned documents by this Directorate.</p> <p>2. Your attention is drawn to Regulation 3{2) of the NEMA EIA Regulations, 2014 {as amended) which states “For any action contemplated in terms of these Regulations for which a timeframe is prescribed, the period of 15 December to 5 January must be excluded in the reckoning of days.”</p> <p>3. Applicable listed activities</p> <p>3.1. The onus is on the applicant to ensure that all of the applicable listed activities are applied for and assessed as part of the EIA process. Only those activities applied for shall be considered for authorisation.</p>	<p><i>Melanese Schippers</i></p> <p><i>Specialised Environmental Officer, EIA Region 1 (Development Management)</i></p> <p><i>Environmental Affairs and Development Planning</i></p> <p><i>Western Cape Government</i></p>	15/11/2018, Email	<p>CSIR:</p> <p>Thank you for your comments. Please see responses below numbered according to your comment:</p> <p>1. Thank you, this is noted.</p> <p>2. Thank you, this is noted.</p> <p>3.1. The application form is being submitted with this version of the Draft Scoping Report, and all relevant listed activities are currently included. Should any activities need to be removed/added, an amended application form will be submitted.</p> <p>3.2. The Final Scoping Report will mark the end of the Scoping Phase, after which the EIA phase will follow.</p> <p>4. Please see Chapter 1 for a table highlighting the requirements of a Scoping Report as defined in terms of Appendix 2 of GN R326 and where to find each requirement in this report.</p> <p>5. The Screening Report has been included in Appendix F of this report. The information contained within this report will be considered in the EIA phase. Section 7.7 of Chapter 7 outlines which specialist studies are going to be conducted, and which existing information is going to be used. However, all impacts will be considered in the EIA phase and the EMPr. The results</p>

<p>3.2.A Scoping and Environmental Impact Reporting Process must be followed in order to apply for environmental authorisation.</p> <p>4. The Scoping Report must contain all the information requirements outlined in Appendix 2 of the NEMA EIA Regulations, 2014 (as amended).</p> <p>5. Screening Report</p> <p>Based on the Screening Tool developed by the National Department of Environmental Affairs (Screening Report herewith attached as Appendix A) the proposed site is located within a very high sensitivity area from a terrestrial biodiversity perspective, the site is located on land with a medium to high agricultural capability, a low sensitivity area from an aquatic biodiversity perspective and a medium sensitivity area from an archaeological and cultural heritage perspective. Please note that the screening report must be considered as part of the Environmental Impact Assessment Process. Further, the screening report has identified a number of specialist studies to be conducted. It is the responsibility of the Environmental Assessment Practitioner to confirm whether these specialist studies will be conducted or provide a motivation as to why the specialist studies will not be conducted as part of the EIA process.</p> <p>6. Exemptions</p> <p>The Directorate notes that you do not intend to apply for exemption from any provisions contained in the NEMA EIA Regulations, 2014 (as amended) or the NEMA. Please note that should exemption from any provisions contained in the NEMA EIA Regulations, 2014 (as</p>		<p>of the screening report will be looked at in the context of the site, the site’s zoning and the SEZ.</p> <p>6. An exemption does not form part of this application.</p> <p>7. All feasible and reasonable alternatives in the context of this project, as well as its location and zoning, have been described in Chapter 5. The preferred alternatives described in this Chapter and that are proposed in the PoS (Chapter 7) are the alternatives that are proposed to be taken into the EIA phase. If any alternatives have not been considered, a reasoning has been provided. Please also refer to the site selection Matrix which assesses the site and location alternatives (Table 5.3) and provides reasoning for the preferred alternative.</p> <p>8.1. Tis has been noted and adhered to.</p> <p>8.2. This has been noted and adhered to.</p> <p>8.3. Please refer to Chapter 4 (Approach) as well as Appendices C to E for the inclusion of all the PPP requirements for this project. The Draft Scoping Report was released to I&APs from the 25th October 2018 to the 26th November 2018 and all comments received have been included in the relevant Appendices above.</p> <p>8.4. This interaction has been undertaken (please refer to Appendices C to E) and state Departments will continue to be consulted throughout the project.</p> <p>9. Please refer to Chapter 1, Section 1.2.1 for the Needs and Desirability.</p> <p>10. Please refer to Chapter 2 which refers to the several ways in which the proposed development will align with the green building standards and sustainable design principles. In addition, these considerations form the cornerstone of “Green-technology”.</p>
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amended) or the NEMA be required, an exemption application must be submitted and the exemption process must be finalised before submitting an application for Environmental Authorisation to the competent authority.

7. Alternatives

Be advised that in terms of the NEMA EIA Regulations, 2014 (as amended) and the NEMA the investigation of alternatives is mandatory. All alternatives identified must therefore be investigated to determine if they are feasible and reasonable. In this regard it must be noted that the Department may grant authorisation for an alternative as if it has been applied for or may grant authorisation in respect of all or part of the activity applied for as specified in Regulation 24 of the NEMA EIA Regulations, 2014 (as amended). Alternatives are not limited to activity alternatives, but include layout alternatives, design, activity, operational and technology alternatives. Every EIA process must therefore identify and investigate alternatives, with feasible and reasonable alternatives to be comparatively assessed. If, however, after having identified and investigated alternatives, no feasible and reasonable alternatives were found, no comparative assessment of alternatives beyond the comparative assessment of the preferred alternative and the "no-go" alternative, is required during the assessment. What would, however, be required in this instance is proof of the investigation undertaken and motivation indicating that no reasonable or feasible alternatives other than the preferred and the "no-go" alternatives exist.

8. Public Participation

11.1. Please refer to Chapter 4 which describes the approach to this EIA and how this is aligned with the regulations.

11.2. Chapter 3 describes the affected social context in great detail, and social impacts will be considered in the EIA phase. In addition, various existing social impact reports and social research for the Atlantis SEZ will be consulted as part of the EIA process, as described in Chapter 7.

11.3. Chapter 1 contains a table showing compliance to Appendix 2 of the NEMA EIA Regulations and this Appendix E outlines how and where each of these comments has been addressed in this Draft Scoping Report.

12. This is noted, thank you.

8.1. You are advised that public participation may be undertaken prior to the submission of the application. However, public participation must comply with the requirements of Regulation 41 (2) of the NEMA EIA Regulations, 2014 (as amended).

8.2. Please be advised that the requirements of the public participation process (“PPP”) are specified in Regulation 41 (2) of the NEMA EIA Regulations, 2014 (as amended).

8.3. The SR must be made available to the Interested and Affected Parties (“I&APs”), including all the relevant State Departments that administer laws relating to a matter affecting the environment, for comment for a period of 30 days.

8.4. In terms of good environmental practice you are encouraged to engage with State Departments and other Organs of State in the pre-application phase to solicit their inputs on any of their requirements to be addressed in the EIA process. Please note that this does not replace the requirement of making the SR available to State Departments as stipulated above.

9. Need and Desirability

In terms of the NEMA EIA Regulations, 2014 (as amended), when considering an application, this Directorate must take into account a number of specific considerations including, inter alia, the need for and desirability of any proposed development. As such, the need for and desirability of the proposed activity must be considered and reported on in the SR. The SR must reflect how the strategic context of the site in relation to

the broader surrounding area, has been considered in addressing need and desirability.

10. Climate change: Energy efficiency/water saving

One of the objectives of the Western Cape Provincial Spatial Development Framework published by this Department is to minimise the consumption of scarce environmental resources such as water, fuel, building materials, mineral resources, electricity and land. To this effect and as part of the efforts to reduce the effects of climate change, you must, as part of the EIA process, identify energy efficient technologies (e.g. the use of low voltage or compact fluorescent lights instead of incandescent globes, maximising the use of solar heating, etc.) that could be implemented for the proposed development. Considering that South Africa is a water-scarce country and that many catchments in the Western Cape are already water stressed, you must also consider implementing the use of water saving devices and technologies (e.g. dual flush toilets, low-flow shower heads and taps, etc.) for the proposed development.

11. General

11.1. In addition to the above requirements, you must clearly show how the proposed development complies with the principles contained in Section 2 of the NEMA and must also show how the proposed development meets the requirements of sustainable development.

11.2. You are reminded that the social context of the proposed development must always be considered. This includes the impact that the proposed development may have on the prevalence of

HIV/AIDS, sexually transmitted infections (STI) and Tuberculosis (TB), as well as equity and gender related concerns.

11.3. You are hereby advised that the SR must contain all the information outlined in Appendix 2 of the NEMA EIA Regulations, 2014 (as amended), and must also include the information requested in this letter. Omission of any of the said information may result in the refusal of Environmental Authorisation.

12. Please note that the pre-application consultation is an advisory process and does not pre-empt the outcome of any future application which may be submitted to the Department. No information provided, views expressed and/or comments made by officials during the pre-application consultation should in any way be seen as an indication or confirmation:

- that additional information or documents will not be requested; or
- of the outcome of the application.

Kindly quote the above-mentioned reference number in any future correspondence in respect of the pre-application.

Please note that the activity may not commence prior to obtaining an environmental authorisation from the competent authority. It is an offence in terms of Section 49A of the NEMA for a person to commence with a listed activity unless the Department has granted an Environmental Authorisation for the undertaking of the activity.

	The Department reserves the right to revise its comments and request further information based on any information received.			
2.	<p>The draft SR dated October 2018, received by this Department on 25 October 2018, and the acknowledgement thereof dated 01 November 2018, refer.</p> <p>1. Screening Report</p> <p>1.1. As indicated in this Directorate's acknowledgement of the Notice of Intent and the draft SR (dated 01 November 2018, based on the Screening Tool developed by the National Department of Environmental Affairs ("DEA"), the proposed site is located within a very high sensitivity area from a terrestrial biodiversity perspective, on land with a medium to high agricultural capability, in a low sensitivity area from an aquatic biodiversity perspective and in a medium sensitivity area from an archaeological and cultural heritage perspective. The proposed site is also located within 8km of a civil aviation aerodrome.</p> <p>1.2. Please note that the screening report must be considered as part of the Environmental Impact Assessment ("EIA") Process.</p> <p>1.3. Further, the screening report has identified a number of specialist studies to be conducted. The Environmental Assessment Practitioner must confirm whether these specialist studies will be conducted or provide a motivation as to why the specialist studies will not be conducted as part of the EIA process.</p> <p>2. Laydown area</p>	<p><i>Melanes Schippers</i></p> <p><i>Specialised Environmental Officer, EIA Region 1 (Development Management)</i></p> <p><i>Environmental Affairs and Development Planning</i></p>	<p>20/11/2018 Email</p>	<p>CSIR: Thank you for your comments. They have been responded to below as per the corresponding numbering:</p> <p>1.1. The results of the screening report are noted, Chapter 6 (Impact Assessment) has been updated to reflect and address the results of the screening report.</p> <p>1.2. Please see response above.</p> <p>1.3. Please see Chapter 6 where the screening report and the recommended specialist studies are addressed in the context of the project, its zoning and its location.</p> <p>2.1. Please note that this section has been updated to reflect that the laydown area will be on-site so as to avoid further impacts.</p> <p>2.2. Please see response above.</p> <p>3.1. An NID is being submitted to HWC as part of the ToR's of the desktop heritage assessment. This version of the Draft Scoping Report has been reflected to update this in Chapter 6 and 7.</p> <p>3.2. Please see response above. A desktop Heritage Assessment is being undertaken for the project due to the vast amount of available information, however, the response from HWC on the NID will be considered.</p> <p>4. Please note the Needs and Desirability Table has been updated to reflect the Department of Environmental Affairs' Integrated Environmental Management Guideline on Need and Desirability (dated March 2017), as this is the latest one.</p>

	<p>2.1. Page 2-12 of the draft SR states, "The laydown area will either be located adjacent to or at the project site. The laydown area is expected to cover a maximum area of 1ha."</p> <p>2.2. Please be advised that locating the laydown area adjacent to the proposed site means that this area must also be assessed as part of the EIA process.</p> <p>3. Other legislation</p> <p>3.1. It is not clear, based on the information as contained in the draft SR, as to whether a Notice of Intent to Develop ("NID") was submitted to Heritage Western Cape ("HWC"). However, the of Study indicates that a Heritage Impact Assessment will be conducted.</p> <p>3.2. Please note that a NID must be submitted and confirmation must be obtained from HWC on whether a Heritage Impact Assessment will be required.</p> <p>4. Need and Desirability</p> <p>4.1. It is noted that this Department's 2010 Guideline on Need and Desirability has been use describe the need and desirability for the proposed development.</p> <p>4.2. Please note that the latest guidelines to describe the need and desirability for the proposed development must be used. In this regard, this Department's 2013 Guideline on Need & Desirability or the Department of Environmental Affairs Integrated Environmental Manager Guideline on Need and Desirability (dated</p>			<p>5.1. The confirmation of potable water supply will be included in the EIA reporting as soon as it is available, however, please note the water saving and harvesting techniques to be employed for the development as per Chapter 2 in order to reduce the reliance on Municipal Water.</p> <p>5.2. As above, Chapter 2, section 2.2 describes the project in relation to required municipal services, of which confirmation will be included in the reporting as soon as it is available. Section 2.6 of Chapter 2 describes how principles will be put in place to reduce the reliance on Municipal services to the maximum extent.</p>
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<p>March 2017) must be used to describe the need and desirability for the proposed development.</p> <p>4.3. An updated description of the need and desirability must be included in the SR to be circulated as part of the application phase public participation process.</p> <p>5. Service confirmation</p> <p>5.1. In light of the water crisis currently being experienced in the City of Cape Town, confirmation 1 sufficient, spare, unallocated water is available to accommodate the proposed developer must be included in the EIA report. You are advised to obtain this confirmation as early as possible and already include it in the application phase SR if available.</p> <p>5.2. In addition to the above, confirmation that sufficient, spare, unallocated capacity to provide services such as electricity, solid waste management, the treatment and disposal of sewage stormwater management must be included in the EIA report.</p> <p>Please note that the activity may not commence prior to an Environmental Authorisation being obtained from the competent authority.</p> <p>This Directorate reserves the right to revise or withdraw comments or request further information based any information received.</p> <p>Your interest in the future of our environment is greatly appreciated.</p>			
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<p>3.</p>	<p>The abovementioned draft Scoping report (DSR), dated October 2018, refers. The City of Cape Town collated comment on the report is as follows:</p> <p>1. TRANSPORT DEVELOPMENT AUTHORITY (TDA): Urban Planning Mechanisms (Urban Integration)</p> <p>1.1. Chapter 2, Project Description: Section 2.3 Components of a Greentech Facility (Page 2-6): Paragraph 2 erroneously makes reference to "General Residential". It should read "General Industrial". This error is also repeated on page 5-6 (Chapter 5: Layout alternatives).</p> <p>1.2. Chapter 2, Project Description: Section 2.3 Components of a Greentech Facility, Table 2.3 (Page 2-7): The primary uses in the General Industrial I (OH) zone have been expanded and the Primary land uses on Table 2.3 must be updated to include the following: industry, restaurant, service station, motor repair garage, funeral parlour, scrap yard, authority use, utility service, crematorium, rooftop base telecommunication station, freestanding base telecommunication station, transport use, multiple parking garage, agricultural industry, private road, open space, additional use rights, veterinary practice and filming (Source: City of Cape Town Municipal Planning By-Law, 2015).</p> <p>2. TRANSPORT DEVELOPMENT AUTHORITY (TDA): Environmental Management Department</p> <p>2.1. For ease of reference please reflect the subject even number on the cover page of the scoping report, as well as the draft EMPr (once available).</p> <p>2.2. Reference (e.g. footnote) when the Atlantis Special Economic Zone (SEZ) was adopted in the Executive</p>	<p><i>Pat Titmuss</i></p> <p><i>Regional Manager: Environmental Management Department: Environmental & Heritage Management Branch - Northern Region</i></p> <p><i>City of Cape Town</i></p>	<p>22/11/2018, Email</p>	<p>CSIR:</p> <p>Thank you for your comments. The comments have been responded to using the corresponding numbering:</p> <p>1.1. Thank you, this has been corrected.</p> <p>1.2. Thank you, this Table has been updated in Chapter 2.</p> <p>2.1. This has been updated to reflect this.</p> <p>2.2. This has been updated to reference this.</p> <p>2.3. Thank you, this has been updated.</p> <p>2.4. Thank you, this has been updated.</p> <p>2.5. Please note this Chapter has been updated to reflect the Nature Reserves as suggested in this comment.</p> <p>2.6. These have all been updated accordingly, thank you.</p> <p>2.7. As consulted with the City, this section of the FSR has been re-written to reflect the incentive scheme accurately as explained in the point mentioned and the Annexure to the City's comments. This information is greatly appreciated.</p> <p>2.8. Chapter 3 has been updated to reflect this.</p> <p>2.9. This rating has been updated to reflect this.</p> <p>2.10. This has been corrected.</p> <p>2.11. This has been corrected, thank you.</p> <p>2.12. Chapter 6, Section 6.2.5 Cumulative impacts and Appendix C: Biodiversity offset Information sections of the FSR have been re-written to reflect the correct representation of the incentive scheme. To this end, the Integrated Reserve Management Plan for the Klein Dassenberg Nature reserve (Annexure C of the DSR) has also been removed from the FSR.</p>
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	<p>Summary (page 3) and Chapter 2, Section 2.1 (page 2-3).</p> <p>2.3. Executive Summary (page 6) erroneously states the Plan of Study appears in Chapter 8. Correct to Chapter 7.</p> <p>2.4. Chapter 2, Section 2.1 (page 2-3): Atlantis Special Economic Zone (page 2-3): Spelling error 'Sepcial' to be 'Special'.</p> <p>2.5. Chapter 3, Section 3.2 Preliminary Sensitivity Screening (page 3-3): The report mentions that the proposed development is located 8km from Camphill Conservation Area but fails to mention that it is 800m from Witzands Aquifer Nature Reserve (located to the north and west). In addition although the Dassenberg Coastal Catchment Partnership (DCCP) is mentioned in Appendix C no mention of the DCCP is made in the report. The DCCP is a landscape conservation initiative and multi stakeholder partnership identified on the basis of extremely high biodiversity value, water security (overlays the Atlantis Aquifer), priority provincial (one of two most important) climate change adaptation and mitigation corridor and socio-economic opportunities.</p> <p>2.6. Chapter 3. Section 3.3.7 Terrestrial Environment: Protected Areas (pages 3-10): The various mentioned nature reserves' correct names must be reflected as follow:</p> <p>2.6.1. The Camphill Private Nature Reserve correct name is the Camphill Conservation Area.</p> <p>2.6.2. White sands Aquifer Protected Area should be correctly named as the Witzands Aquifer Nature Reserve and Koeberg Private Nature Reserve should read Koeberg Nature Reserve.</p>			<p>2.13. This information has been added to this report to correct the erroneous explanation of the biodiversity offset as stipulated in the DSR.</p> <p>2.14. Please note that this report has been removed from this version of the Draft Scoping Report following comments in the pre-application phase (previously was Appendix C of the first DSR).</p> <p>2.15. This has been updated to reflect this contact person only.</p> <p>3.1.1. The broad production processes of each of the proposed technologies will be further described relating to their impacts in the EIA reporting.</p> <p>3.1.2. It is not anticipated that any of these processes would result in an Atmospheric Emissions Licensing in terms of GN 893, as amended, which is promulgated in terms of the National Environmental Management: Air Quality Act (NEM: AQA), however, should this need arise, due legal processes will be followed to obtain this license prior to any commencement of activity.</p> <p>3.1.3. This is noted and the Branch will be contacted for further information regarding this process.</p> <p>3.2. This is noted.</p> <p>3.2.1. This is noted.</p> <p>3.2.2. This is noted, if required.</p> <p>3.3. It is not anticipated that this development will include any operations included in listed activity/ies specified in G.N. R893 of 215, however, this will be reinforced and confirmed</p>
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<p>2.6.3. The Pela (Pela) Nature Reserve is part (a section) of the Riverlands Nature Reserve.</p> <p>[Note: All the above areas, except the Camphill Conservation Area, and including Bugerspost and Groenfontyn form part of the Dassenberg Coastal Catchment Partnership.</p> <p>2.7. Chapter 3, Section 3.3.8 Threatened Ecosystems (page 3-1 1) - This section refers to the Atlantis Industrial incentive Scheme, however the Atlantis Industrial Incentive Scheme is not also termed a Land Banking Mechanism as mentioned in the report. Be advised that there are various incentives that are part of the Atlantis Industrial Incentive scheme. The land banking component is just one of these incentives that aim to attract development to the Atlantis area. Furthermore it is not only one property that has been purchased for this purpose (e.g. To date 14 properties have been purchased totalling 940 hectares in order to compensate for the potential loss of indigenous vegetation within the Atlantis Industrial area). The opinion is held that the entire Section 3.3.8 of the DSR requires a rewrite as explained under points 2.12 and 2.13 below.</p> <p>2.8. The DSR should acknowledge that this development falls within the Atlantis Aquifer protection zone (zones 2 and 3).</p> <p>2.9. Chapter 6: Potential Environmental Impacts. Table 6.1 (page 6-5): The Significance of Impact rating pertaining to the loss of 32.6 ha Endangered Strandveld of international significance is 'High' not 'Moderate' (Also refer to paragraph two on page 6-8 on the DSR in this regard).</p>			<p>for the Departments acknowledgment in future reporting.</p> <p>3.3.1. The full impact of the various stages of the project on air quality will be explored and addressed in further reporting, and the PoS in Chapter 7 has been updated to reflect the extent of this assessment.</p> <p>3.3.2. The proposed EMPr will provide detail to how each of the proposed air impacts will be addressed and mitigated.</p> <p>3.3.3. This is noted.</p> <p>3.3.4. This is noted.</p> <p>4.1. Please note that the Scoping and EIA process does not include disaster and risk reports, and that these reports will be compiled and submitted to this Authority during the design phase of the project, when detailed layouts and technologies have been finalised. The project applicant has taken note of this requirement.</p> <p>4.2. This requirement will be added to the EMPr.</p> <p>The delivery quantity and format of reports to be submitted to the City in future has been noted.</p>
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<p>2.10. Chapter 7: Plan of Study, Table 7.4 (page 7-9): Two acronyms are used CFDS and ASF. which presumably refers to Cape Flats Dune Strandveld (CFDS) and Atlantis Sand Fynbos (ASF). If so please type out the full name.</p> <p>2.11. Chapter 7: Plan of Study. Table 7.6 (page 7-1 1): Spelling error 'Lisrt' to be 'List'.</p> <p>2.12. Further to Chapter 3, Section 3.3.8, the Chapter 6, Section 6.2.5 Cumulative impacts and Appendix C: Biodiversity offset Information sections of the DSR requires a complete rewrite. It is appreciated that the CSIR tried to demonstrate to the Competent Authority that the proposed project qualifies for the Atlantis Industrial Incentive Scheme. However the arguments put toward in the DSR illustrates that the CSIR clearly misunderstand how the Atlantis Industrial Incentive Scheme works. In addition the Integrated Reserve Management Plan for the Klein Dassenberg Nature reserve (Annexure C) cannot be argued as a "biodiversity offset" as stated by the CSIR. For ease of reference in order to redraft Sections 3.3.8 and 6.2.5 of the DSR kindly peruse the information sheet entitled: Atlantis Biodiversity incentives - Development facilitation through land banking (attached as Annexure A). For further clarification it is suggested the CSIR liaise directly with the City of Cape Town: Environmental Management Department (Tel: 021 444 0601)</p> <p>2.13. In the event of the Atlantis Industrial incentive Scheme being utilized, it would be more relevant to stipulate the following in the future EIA report(s): The proposed New GreenTech Project falls within the urban edge of the Atlantis Industrial Area and will account for the loss of 32.6 hectares of Endangered Cape Flats Dune Strandveld. The</p>			
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	<p>proposed development area is highlighted on the City of Cape Town: Biodiversity Network Map (2018) as "Other Natural Area". A biodiversity off-set in accordance with the Land Bank of the Atlantis Industrial incentive Scheme is proposed to the Competent Authority. The offset land proposed measures 32.6 hectares. As such it is proposed to the Competent Authority that an offset ratio of H is applied in order to mitigate for the loss of this significant area of Cape Flats Dune Strandveld. in addition to the proposed utilization of the Atlantis industrial incentive Scheme at a ratio of 1: 1, the following proposed conditions are required:</p> <ul style="list-style-type: none"> • Search & rescue of all translocatable species to the commencement of construction; and • Following the final decision by the Competent Authority, the developer must give the City of Cape Town: Biodiversity Management Branch and Cape Nature • minimum three {3} months' notice p_r_i_o_r to the commencement of construction, in order for search & rescue to be completed in the appropriate season. <p>2.14. Be advised that the Klein Dassenberg Nature Reserve: integrated Reserve Management Plan (October 2014) was compiled by the City of Cape Town: Biodiversity Management Branch. If the CSIR wish to utilize the document in their report the document's source must be properly referenced/credited.</p> <p>2.15. Appendix B: The database list of City of Cape Town interested & affected personnel (pages 2 and 3) are outdated. Please remove all the listed City of Cape Town personnel and replace with the following singular City of Cape Town entry point for EIAs: City</p>			
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	<p>of Cape Town, Director: Environmental & Heritage Management Department, Miinerton. Civic Building. 87 Pienaar Street. Miinerton, 7435 {For Attention: Pat Titmuss. Tel: 021 4440598, e- mail: pattimuss@cagetown.gov.za</p> <p>3. SPECIALISED ENVIRONMENTAL HEALTH: Air Quality Management Branch</p> <p>The City's Air Quality Management Branch request further information in terms of the following:</p> <p>3.1. The Branch appreciates the intention of the EIA and the "envelope" format being used to streamline the process.</p> <p>3.1.1. However, as there are three main technology alternatives listed for the proposed future use of the site, it would be appreciated if the production processes of each of the proposed technologies are investigated and detailed in further reporting during the EIA process.</p> <p>3.1.2. In addition to the production processes being explored, further reporting must examine it these processes would result in the need for Atmospheric Emissions Licensing in terms of GN 893, as amended, which is promulgated in terms of the National Environmental Management: Air Quality Act (NEM: AQA).</p> <p>3.1.3. Furthermore, although a requirement for later in the development process, please note that the City of Cape Town's Air Quality Management By-law, 2016. prescribes that fuel burning appliances must be registered, prior to installation and operation. The Branch can be</p>			
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	<p>contacted for further information regarding this process.</p> <p>3.2. Should Atmospheric Emissions Licensing be required by the proposed business, and as the land on which the development will take place is City owned land, please stipulate if the City of Cape Town will be the license holder.</p> <p>3.2.1. Should the license holder be deemed to be the City of Cape Town, please note that the licensing authority for activity will be the Western Cape Government.</p> <p>3.2.2. The City of Cape Town: Air Quality Management Branch will however continue to provide comment, where necessary, during the licensing process.</p> <p>3.3. Furthermore, should the proposed operations include listed activity/ies specified in G.N. R893 of 215, there will be a requirement to conduct specialist air impact studies to determine the impact of the proposed activity on the receiving environment.</p> <p>3.4. It is noted that a potential environmental risk and impact assessment was included in the Scoping report, however, limited air impacts were explored.</p> <p>3.4.1. The full impact of the various stages of the project on air quality must be explored and addressed in further reporting.</p> <p>3.4.2. The proposed EMP must provide detail to how each of the proposed air impacts will be addressed and mitigated.</p> <p>3.4.3. Should the need arise, the City of Cape Town: Air Quality Management Branch may request a further site specific Dust and Odour Management Plan to be submitted for approval</p>			
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	<p>by this office prior to commencement of activities on site.</p> <p>3.4.4. Please note that the burning of felled vegetation will not be permissible within the industrial area and alternative safe disposal methods must be documented.</p> <p>4. Disaster Risk Management Centre</p> <p>As mentioned in the DSR the subject erven are situated within the 5 km Urgent Protection action planning Zone (UPZ) of the Koeberg Nuclear Power Station [KNPS). The Disaster Risk Management Centre (DRMC) is the custodian (on behalf of the City of Cape Town) for the execution of the Koeberg Nuclear Power Station Radiological Release Hazard Disaster Risk Management Plan (RRR). DRMC is tasked with the responsibility of ensuring that the public safety arrangements are in place in the case of a nuclear emergency. and that individual citizens are not endangered, with particular emphasis on the population residing and working in the UPZ of the area from the KNPS.</p> <p>4.1. In light of the above an emergency plan must be drafted for all phases of development and operation of the site. The emergency plan must include a risk assessment indicating all relevant hazards and their associated risks.</p> <p>4.2. The requirement that a Koeberg Nuclear Power Station emergency procedure must be developed for the approval by the City of Cape Town: Disaster Risk Management Centre must be included in the EMPr.</p>			
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	The abovementioned comment must be included in the next EIA report. The said report must be submitted to this office in the form of 1 hard copy and 1 electronic CD/flash disk version.			
4.	<p>Further To The City of Cape Town’s comment, dated 22 November 2018, The following delayed input was received from The City’s Electricity Generation & Distribution Branch pertaining To available power capacity. The subject erven are located within The City of Cape Town’s supply area:</p> <ol style="list-style-type: none"> 1. A master site development plan indicating the phasing of the development plans of the individual sites is required. Note that the electricity infrastructure serving each erf may not be dedicated to that site alone. Infrastructure such as substation sites may be required to serve a wider area or future phases of the project as well as other adjacent projects. 2. Electricity's standard conditions of supply and fees will apply and will include a connection cost as well as a Shared-Network Charge (SNC) to each erf of the development. 3. The present authorised capacity of the entire development area (Zone 2) is nil. The specified SNC tariffs will be applicable and dependant on the load requirement at the time of application. 4. A supply of up to 2 MVA can readily be made available at 11kV, although this may require the construction of a suitable substation room or building by the developer. 5. Supplies in excess of: <ol style="list-style-type: none"> 5.1. 2 MVA to the entire development, or any further supply applications beyond the 2 MVA Will require the construction of a 	<p><i>Morné Theron</i></p> <p><i>Senior Environmental Practitioner: Environmental & Heritage Management Environmental Management Department</i></p> <p><i>City of Cape Town’s Transport and Urban Development Authority</i></p>	27/11/2018, Email	<p>CSIR: These comment have been included and responded to below:</p> <ol style="list-style-type: none"> 1. Please note due to the nature of this project and the final layout and technology that will be implemented depends of the investment opportunities in the SEZ. This is why the Envelope Approach has been implemented for this project (Please refer to Chapter 2). However, during the design phase when layouts and technologies have been finalised, this Department will be consulted and these plans will be submitted (Note: a BID for the SEZ master plan has been released so this process is currently underway). 2. This is noted, thank you. 3. This is noted and will be taken into consideration for the design of the facility. 4. This is noted and will be taken into consideration for the finalisation of the project design. 5. The developer will take onus of this in relation to the final project design and type of technology, capacity required.

	<p>33/11kV main substation by the developer on a separate erf. The timeline for design, construction, equipping and commissioning of such a substation is on average 2 years and is dependent on the City's budget allocation.</p> <p>5.2. 7 MVA to the entire development will be provided at 33W:</p> <p>5.3. 20 MVA to the entire development will be provided at 132kV.</p> <p>For Options 5.2 and 5.3 the developer may be fully cost responsible for the construction and equipping of such substation.</p> <p>Enquiries regarding Electricity Generation and Distribution Department comments may be directed to Shiraaz Swartland at shiraazswarttandgcagetowngov£9 or to Michael Schmidt at michael.schmidt@cagr_etown.gov10.</p> <p>Kindly please ensure that this comment is attached as an addendum To The City comment and addressed in the next EIA report.</p> <p>My apology for The delayed additional comment.</p>			
5.	<p>CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.</p> <p>The application area is classified as Other Natural Areas on the Biodiversity Network (BioNet) for the City of Cape</p>	<p><i>Rhett Smart</i></p> <p><i>Scientist: Land Use Advisor Scientific Services</i></p> <p><i>CapeNature</i></p>	26/11/2018, Email	<p>CSIR:</p> <p>Thank you for your comments.</p> <p>The Reserve Management Plan which was attached to the DSR as Appendix C has been removed as it is outdated and does not adequately reflect the offsetting and incentive scheme. The Report has been updated throughout to accurately reflect the</p>

<p>Town and the Western Cape Biodiversity Spatial Plan (WCBSP). The natural vegetation occurring on the site is Cape Flats Dune Strandveld, listed as Endangered. No freshwater features are mapped for the site according to the BioNet or NFEPA, however there is a small section of wetland in the north according to the WCBSP wetland layer, which is based on wetland signatures from the land cover layer.</p> <p>The proposed project forms one of four phases for the Atlantis Special Economic Zone (SEZ) development, with the first phase already approved, as described in the Draft Scoping Report, and with development components already in place. The primary mitigation measure for impacts on terrestrial biodiversity for Phase 1 of the overall development was a biodiversity offset.</p> <p>The biodiversity offset was however proposed as a cumulative biodiversity offset, for which Phase 1 formed the first component. A conservation bank was initiated which allowed for a receptor area for biodiversity offsets for development within the Atlantis SEZ. CapeNature has been engaged since the initiation of this project.</p> <p>The integrated reserve management plan (IRMP) for the Klein Dassenberg Nature Reserve has been included as an appendix and is classified as biodiversity offset information. The Klein Dassenberg Nature Reserve is the receptor site for the biodiversity offset, which is the connection to the biodiversity offset. The IRMP in isolation does not however function adequately as a biodiversity offset report as the report focuses on the management interventions of the nature reserve and it is not contextualized in terms of the biodiversity offset.</p>			<p>processes undertaken for the incentive scheme, as suggested by The City of Cape Town above. The City of Cape Town (Environmental Management Department) is assisting with compiling all the relevant biodiversity information that will form part of this Draft and the Final Scoping Report and will be expanded upon in the EIA report. Appendix F contains relevant information for the incentives scheme and this will also be included in the Draft EIA report which will be circulated for comment. CSIR requests that CapeNature please review this so as to ensure they are satisfied with the contents thereof.</p> <p>With regards to a freshwater presence scan, please refer to Chapter 3 which describes the desktop analysis undertaken to pick up the presence of freshwater bodies. This highlights that due to the lack thereof, a Freshwater Specialist Assessment is not proposed in the PoS.</p> <p>With Regards to Figure 5.1 the discrepancy needs to be modified to exclude the additional erven that was mistakenly included.</p>
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<p>The Plan of Study for EIA has proposed that an ecological impact assessment must be undertaken for the EIA Phase, which is supported by CapeNature. The ecological impact assessment will need to take into account the cumulative biodiversity offset and recommend any other appropriate mitigation measures. Particular attention should be paid to the presence of threatened species and associated mitigation measures, as the already secured habitat may not compensate for these impacts.</p> <p>The assumption is made that the ecological impact assessment will focus on terrestrial habitat. Cape Flats Dune Strandveld does tend to contain numerous wetlands, which are often groundwater fed and at a small scale which may not be picked up on desktop mapping. There was additionally evidence of wetland conditions in the northern section as described above. CapeNature therefore recommends that a freshwater specialist scan is included in the EIA Phase. Should any wetlands be identified then a freshwater impact assessment must be undertaken and the relevant listed activities included within the application.</p> <p>In addition to the above, it is recommended that a biodiversity offset report is included in the EIA Phase. Although the biodiversity offset has already been secured, the biodiversity offset must be placed in context of the development proposal and must demonstrate compliance with the draft provincial biodiversity offset guideline and draft national biodiversity offset policy. The biodiversity offset report will need to demonstrate the key principles of biodiversity offsets, such as the mitigation hierarchy, which would link to the alternatives section in the Draft</p>			
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<p>Scoping Report, as well as an explanation of the offset design in accordance with the policy and guidelines. The designation as an SEZ would be a factor to consider.</p> <p>CapeNature wishes to highlight that the designation of the project application area in the alternatives section in Figure 5.1 differs from that included within the project description in Figure 2.1. Figure 5.1 includes additional erven to those in Figure 2.1 and the discrepancy needs to be clarified.</p> <p>In conclusion, CapeNature recommends that the comments above must be taken into consideration and addressed in the EIA Phase of the application.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>			
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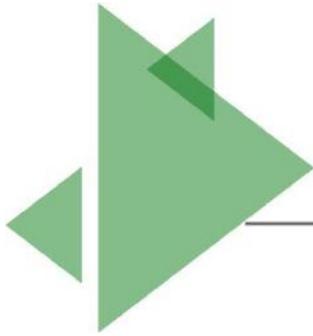
Scoping and Environmental Impact Assessment (EIA) for GreenTech in Zone 2
of the Atlantis Special Economic Zone, Atlantis Industrial, Western Cape

DRAFT SCOPING REPORT



APPENDIX F

Other info



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1. DEA Screening Tool Report (as submitted by DEA&DP)

**SCREENING REPORT FOR AN ENVIRONMENTAL AUTHORIZATION OR
FOR A PART TWO AMENDMENT OF AN ENVIRONMENTAL AUTHORISATION
AS REQUIRED BY THE 2014 EIA REGULATIONS – PROPOSED SITE
ENVIRONMENTAL SENSITIVITY**

EIA Reference number: 16/3/3/6/7/2/A1/2/3316/18

Project name: MANUFACTURING FACILITIES FOR THE RENEWABLE ENERGY SECTOR

Project title: THE DEVELOPMENT OF MANUFACTURING FACILITIES AND ASSOCIATED
INFRASTRUCTURE FOR RENEWABLE ENERGY SECTOR ON A PORTION OF THE REMAINDER OF
ERVEN 277, 246, 254 AND 171, ATLANTIS.

Date screening report generated: 31/10/2018 08:12:28

Applicant: CITY OF CAPE TOWN

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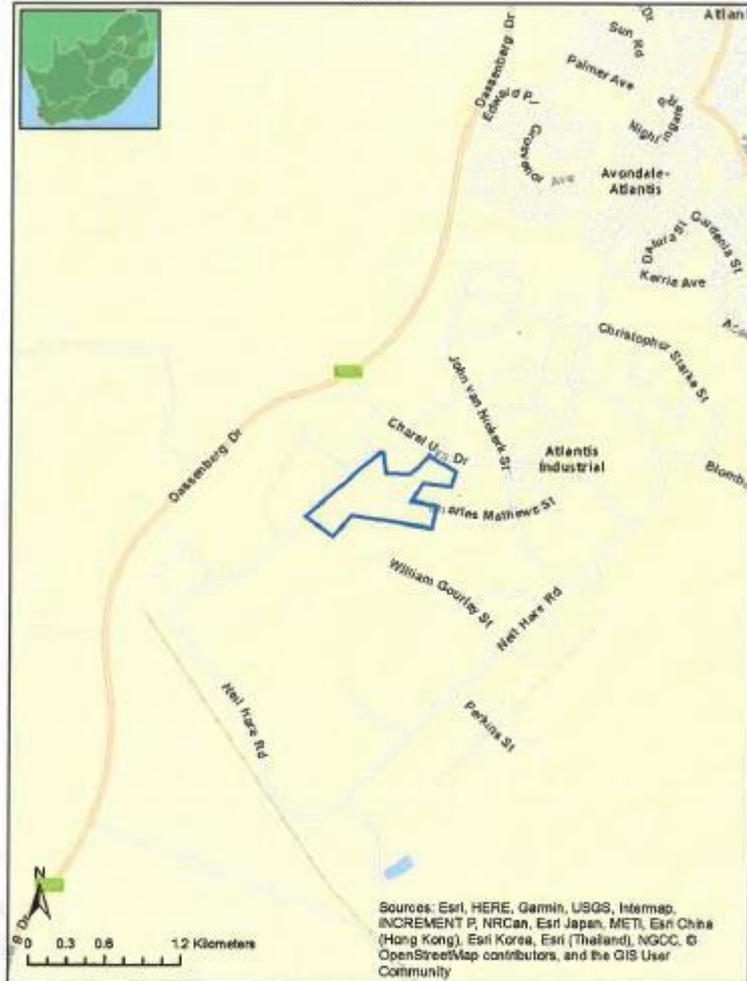
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Proposed Project Location

Orientation map 1: General location

General Orientation: MANUFACTURING FACILITIES FOR THE RENEWABLE ENERGY SECTOR



Map of proposed site and relevant area(s)



Cadastral details of the proposed site

Property details:

No	Farm Name	Farm/Erf Number	Portion	Latitude	Longitude
1	FARM 1183	1183	00000	-33.59595	18.47417
2	FARM 1183	1183	00000	-33.59489	18.47506
3	FARM 1183	1183	00000	-33.59475	18.47535
4	FARM 1183	1183	00215	-33.58835	18.47396
5	FARM 1183	1183	00050	-33.59179	18.47516
6	FARM 1183	1183	00004	-33.60017	18.47325
7	FARM 1183	1183	00072	-33.59058	18.47613
8	FARM 1183	1183	00199	-33.5892	18.47622
9	FARM 1183	1183	00004	-33.60018	18.47322
10	FARM 1183	1183	00074	-33.5915	18.47369
11	FARM 1183	1183	00045	-33.59002	18.47321

Development footprint¹ details:
No development footprint(s) specified.

Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area

No	EIA Reference	Classification	Status of	Distance from proposed
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¹ "development footprint", means the area within the site on which the development will take place and includes all ancillary developments for example roads, power lines, boundary walls, paving etc. which require vegetation clearance or which will be disturbed and for which the application has been submitted.

	No		application	area (km)
1	12/12/20/2393	Solar PV	Approved	29.7
2	12/12/20/2384	Solar PV	Approved	20.8
3	12/12/20/2109	Solar PV	Approved	14.8

Environmental Management Frameworks relevant to the application

No intersections with EMF areas found.

Environmental screening results and assessment outcomes

The following sections contain a summary of any development incentives, restrictions, exclusions or prohibitions that apply to the proposed development site as well as the most environmental sensitive features on the site based on the site sensitivity screening results for the application classification that was selected. The application classification selected for this report is: Transformation of land | Indigenous vegetation | Transformation of land - Indigenous vegetation.

Relevant development incentives, restrictions, exclusions or prohibitions

The following development incentives, restrictions, exclusions or prohibitions and their implications that apply to this site are indicated below.

Incentive, restriction or prohibition	Implication
Strategic Transmission Corridor-Central corridor	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/GNR_350_of_13_April_2017.pdf

Map indicating proposed development footprint within applicable development incentive, restriction, exclusion or prohibition zones

Project Location: MANUFACTURING FACILITIES FOR THE RENEWABLE ENERGY SECTOR



Proposed Development Area Environmental Sensitivity

The following summary of the development site environmental sensitivities is identified. Only the highest environmental sensitivity is indicated. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme		X		
Aquatic Biodiversity Theme				X
Archaeological and Cultural			X	

Heritage Theme				
Civil Aviation Theme		X		
Defence Theme				X
Terrestrial Biodiversity Theme	X			

Specialist assessments identified

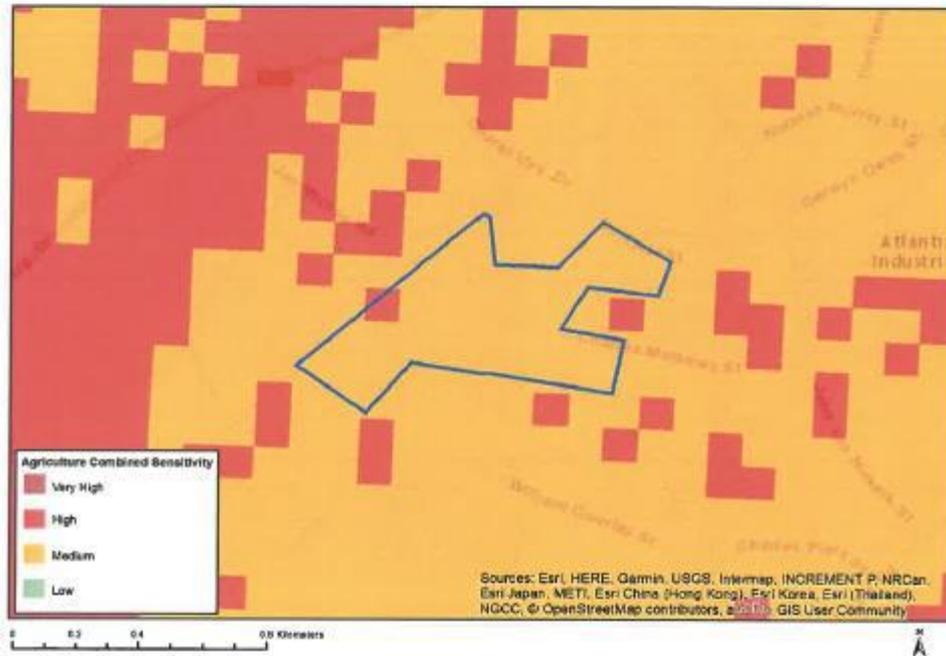
Based on the selected classification, and the environmental sensitivities of the proposed development footprint, the following list of specialist assessments have been identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation.

N o	Specialist assessment	Assessment Protocol
1	Landscape/Visual Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/Assessment/General/Appendix6.pdf
2	Archaeological and Cultural Heritage Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/Assessment/General/Appendix6.pdf
3	Palaeontology Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/Assessment/General/Appendix6.pdf
4	Terrestrial Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/Assessment/General/Appendix6.pdf
5	Aquatic Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/Assessment/General/Appendix6.pdf
6	Avian Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/Assessment/General/Appendix6.pdf
7	Socio-Economic Assessment	https://screening.environment.gov.za/ScreeningDownloads/Assessment/General/Appendix6.pdf

Results of the environmental sensitivity of the proposed area.

The following section represents the results of the screening for environmental sensitivity of the proposed site for relevant environmental themes associated with the project classification. It is the duty of the EAP to ensure that the environmental themes provided by the screening tool are comprehensive and complete for the project. Refer to the disclaimer.

MAP OF RELATIVE AGRICULTURE THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Land capability;09. Moderate-High/10. Moderate-High
Medium	Land capability;06. Low-Moderate/07. Low-Moderate/08. Moderate

MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY

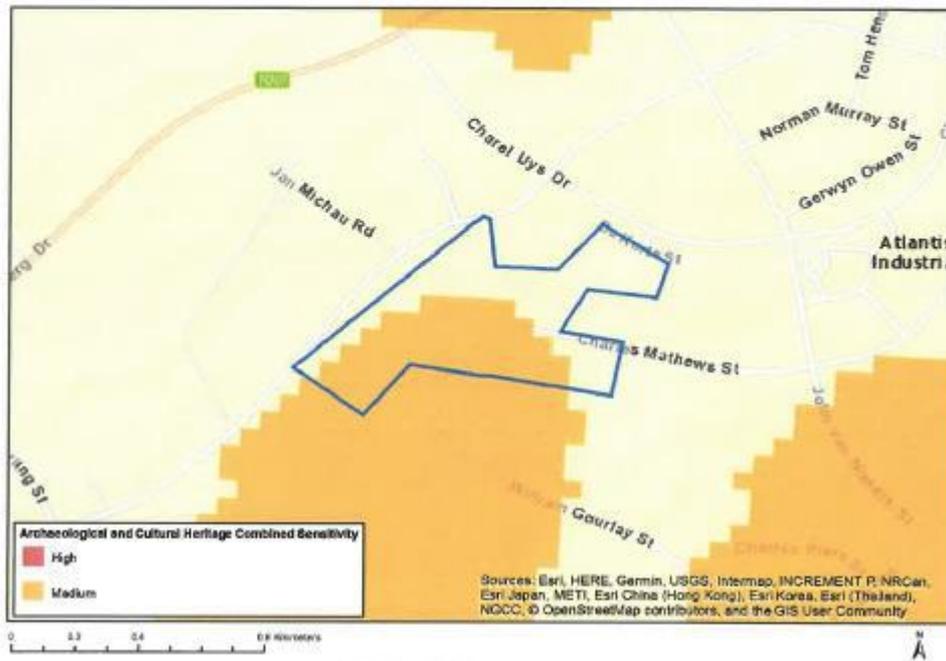


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity Areas

MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY

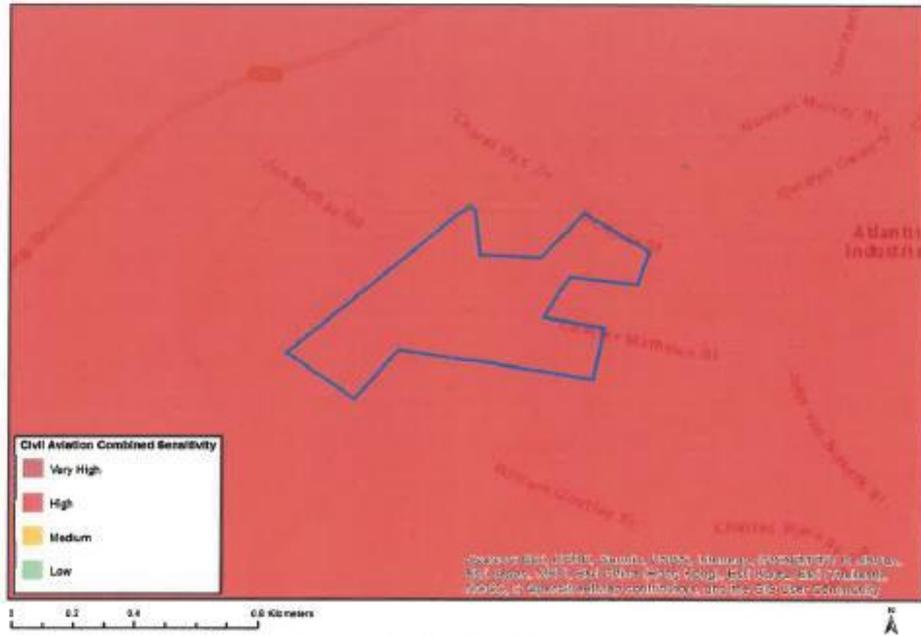


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Mountain or ridge

MAP OF RELATIVE CIVIL AVIATION THEME SENSITIVITY

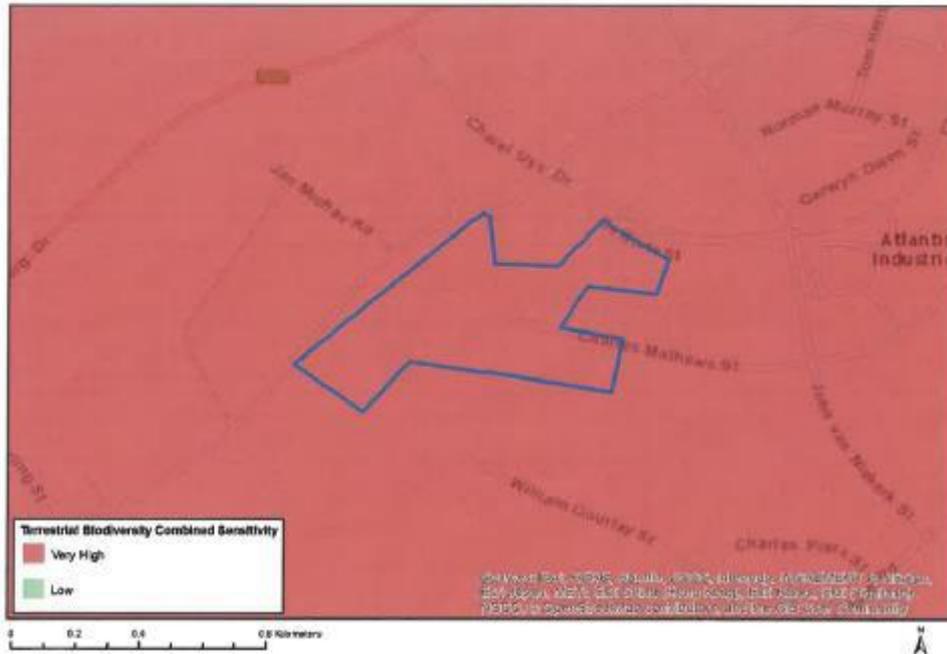


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Within 8 km of other civil aviation aerodrome
High	Dangerous and restricted airspace as demarcated

MAP OF RELATIVE TERRESTRIAL BIODIVERSITY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Very High	CBA, Conservation area, Protected area, FEPA, Focus area for PAES

2. Confirmation from the DEA&DP (dated 11 October 2017) that a Noise Impact Assessment is not necessary for this proposed development

From: Alvan Gabriel
Sent: 11 October 2017 12:19 PM
To: Henri Fortuin <Henri.Fortuin@westerncape.gov.za>
Subject: RE: Requirement for Noise Impact Assessment - Industrial Zone

Hi Henri,

Yes I agree - I think it's SANS 10103, and the city by-laws. That should certainly suffice. Also, they should check what the DEA screening tool throws out for their development footprint!

Best regards
Alvan

From: Henri Fortuin
Sent: 11 October 2017 12:08 PM
To: Alvan Gabriel <Alvan.Gabriel@westerncape.gov.za<mailto:Alvan.Gabriel@westerncape.gov.za>>
Subject: RE: Requirement for Noise Impact Assessment - Industrial Zone

Hi Alvan,

Do you think a sufficient solution would be to require them to abide by the SANS codes through their construction and operational EMP, and not ask for a noise assessment?

From: Kelly Stroebel [mailto:KStroebel@csir.co.za]
Sent: 11 October 2017 11:48 AM
To: Henri Fortuin <Henri.Fortuin@westerncape.gov.za<mailto:Henri.Fortuin@westerncape.gov.za>>
Subject: Requirement for Noise Impact Assessment - Industrial Zone

Good Morning Mr. Fortuin,

I am contacting you regarding a proposal that CSIR is submitting for the City of Cape Town and GreenCape for an EIA for a green technology manufacturing facility on a few portions of land in the Atlantis Industrial Area.

We are just wanting to find out what the requirements are for a Noise Impact Assessment, given that the area is zoned industrial and there are several heavy industries surrounding the land (i.e. Ankerlig Power Station and Atlantis Foundries). Would it be recommended that a full noise assessment is done for the EIA, despite the zoning and lack of sensitive receptors?

Your advice with regards to the above would be greatly appreciated.

Kind Regards,

Kelly Stroebel
Environmental Assessment Practitioner (EAP)
CSIR Stellenbosch

kstroebel@csir.co.za<mailto:kstroebel@csir.co.za>
Tel. : 021 888 2432
PO Box 320, Stellenbosch, 7599

3. Background to the Atlantis Industrial Incentives Scheme

ATLANTIS BIODIVERSITY INCENTIVES - DEVELOPMENT FACILITATION THROUGH LAND BANKING

1. Background

Approximately 906 hectares of the vacant land in the Atlantis urban edge and industrial area contains Critically Endangered Atlantis Sand Fynbos or Endangered Cape Flats Dune Strandveld vegetation. The National Environmental Management Act (NEMA) EIA Regulations require that Environmental Authorisation be obtained for the clearance or removal of an area of 300 square metres or more of Endangered or Critically Endangered vegetation. As a result, new developments which contain vegetation remnants in the industrial area or urban edge of Atlantis require a time consuming botanical assessment as part of the EIA process. In addition, the conditions of approval may require costly mitigation measures and offsets to moderate for the loss of biodiversity. This time delay and potential mitigation costs are often viewed as a deterrent to investment and development in Atlantis.

2. Land banking mechanism

In May 2013, Council approved the **Atlantis Industrial Incentives Scheme (Report C46/05/13)**. One of the suite of incentives approved was that of holding land in order to pro-actively provide biodiversity offsets:

Biodiversity offsets	Apply where Environmental impact Authorisation for new development in industrial area requires biodiversity conservation – City holding sufficient land for nature reserve purposes	EESP; ERM department to set procedure by which developer can 'apply' to benefit from off-set land. Also recording mechanism.
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On 18 September 2012 (Item MIC 09/09/12) the Executive Mayor together with the Mayoral Committee resolved that the Dassenberg Coastal Catchment Partnership (DCCP) initiative be recognized and supported as an important multi-stakeholder project that can bring benefits to the region. In August 2014 (MIC 04/08/14) the Executive Mayor together with the Mayoral Committee supported the biodiversity land banking mechanism to mitigate for biodiversity loss and thereby facilitate development within the Urban Edge and industrial area of Atlantis.

The City's pragmatic proposal was that a proactive land bank be established where Critical Biodiversity Areas, outside of the urban edge, are conserved and managed. This land bank can then be used to facilitate the loss of remnant vegetation within the Atlantis Urban Edge. The simple ratio of 1:1 is applied irrespective of vegetation type or condition. This mechanism thereby facilitates development within the Urban Edge and industrial areas of Atlantis without any cost to the developer and without any time delays. The competent authority, the Department of Environmental Affairs & Development Planning (DEA&DP) and CapeNature are both in support of this proactive approach (**refer to CapeNature's comments in Appendix E to this Scoping Report**). The land targeted for acquisition is all Critical Biodiversity Area highlighted on the fine scale conservation plan for the City, the Biodiversity Network (BioNet). The properties contain extremely high quality critically endangered Atlantis Sand Fynbos and Swartland Granite Renosterveld needed for national conservation targets. The properties contain an extraordinary number of threatened plant species. Several of the properties purchased to date comprise of slopes of Kanonkop and the Dassenberg, a significant landscape feature in the area. There are numerous opportunities associated with conserving and utilizing this feature for sustainable recreation

activities. All the properties purchased are adjoining and are critical components in the greater landscape initiative known as the Dassenberg Coastal Catchment Partnership.

3. Implementation to date

To date, 14 adjoining properties totalling 940 hectares of biodiversity area have been purchased. This equates to 96.35% of the natural vegetation in Atlantis with only 33ha needed to complete the land bank. A general biodiversity off-set ledger has been established to keep track of how many hectares of biodiversity have been secured by the City and how many have been transformed by development within Atlantis.

To date, three developments totalling 75 ha have benefited from the land bank (Table 1). An additional seven totalling 68.37 ha of biodiversity area are in process (Table 2). Together, this equates to ten applications totalling 143.37 ha.

Table 1: List of developments which have been facilitated / mitigated for by using the proactive land bank

Development	Details	Area (ha)
Atlantis Green Hub	EIA ref: 16/3/1/1/A1/2/303712 Proposed offset to be confirmed by DEA&DP	68
Portion 4 of Erf 1183 (Electrical Substation)	EIA ref: 16/3/1/1/A1/2/3013/14. Offset (1:1) to be agreed to By CapeNature	2.6
Portion 1 of Erf. 1543 (shopping centre)	Approved. EIA ref: 16/3/1/1/A1/2/3035/14 Offset (1:1) a condition of approval.	4.4
Total:		75

Table 2: List of developments which are in the process of being facilitated / mitigated for by using the proactive land bank

Description	Status	Area (ha)
Portion 1 of Cape Farm 1065 (i.e. New mixed use Industrial/Commercial precinct	EIR with DEA&DP	20.5
Ptn 212 of Farm 1183 - Mpaact extension	Pre-application phase	0.4
EA for clearing of 5 CCT owned sites before selling	Scoping	24.44
CA4 -69RE	Basic assessment	6.22
CA1183 portion-50	Basic assessment	2.52
CA1183 portion-55:	Basic assessment	4.30
CA1183-162	Basic assessment	9.99
Total:		68.37

4. Additional benefits to date:

In addition, the acquisition of the land has catalysed the creation of EPWP work opportunities. To date, R1 914 778.16, which equates to 14809 person days, has been created on the land acquired. Of special note is that fact that R1 296 984.39 of this has come from an external source, the Cape West Coast Biosphere Reserve. These funds would not have been spent in the area had the City not acquired this land. All the people employed have been from the surrounding communities of Pella, Mamre and Atlantis and have been selected from the subcouncil indigent lists. The long term environmental education, recreation and tourism benefits of having well managed natural open space in this region will only be realised in the long term. However the immediate EPWP work and training opportunities are already being realised.

The land purchased has long been identified as containing critically important biodiversity. The areas collectively comprise one of the most highly threatened and significant natural areas left in Cape Town. The acquisition and securing of these properties are a great step forward in conserving the City's unique natural heritage. These acquisitions have also resulted in the majority of the significant landscape feature, Kanonkop, being acquired into public ownership. This hill was previously subdivided into several small private properties, and was inaccessible to the public. This feature will now be under City ownership. There are numerous recreational and tourism opportunities that this provides that cannot be facilitated elsewhere in the region.

5. Proposed GreenTech facility

The proposed GreenTech Project falls within the urban edge of the Atlantis Industrial Area and will account for the loss of 32.6 hectares of Endangered Cape Flats Dune Strandveld. The proposed development area is highlighted on the City of Cape Town: Biodiversity Network Map (2018) as "Other Natural Area". A biodiversity off-set in accordance with the Land Bank of the Atlantis Industrial incentive Scheme is thus being proposed to the Competent Authority and it is proposed that an offset ratio of 1:1 is applied in order to mitigate for the loss of this significant area of Cape Flats Dune Strandveld. In addition to the proposed utilization of the Atlantis industrial incentive Scheme at a ratio of 1:1, certain conditions will form part of the EMPr in the EIA phase, as required.