

Meeting Agenda

Project number	1001556	Meeting date	2021-10-28
		Meeting Time	10h00
Project name	Cato Ridge EIA	Drafted by	N Way-Jones
Meeting/subject	EDTEA Pre-Application Meeting	Total pages	16 plus Appendix

AGENDA

Item	Topic
1	Welcome and introductions
2	Apologies
3	Project Description
4	Approach to the EIA application process
5	Public Participation
6	Discussion and Questions
7	Way Forward
8	Close of Meeting

Attendees

Name	Organisation	Telephone	Email
Ian Felton (IF)	EDTEA	082 461 9101	ian.felton@kznedtea.gov.za
Kacy Rengasamy (KR)	EDTEA: Head Office: Coordinator for EIA Unit	033 264 2572	kacy.rengasamy@kznedtea.gov.za
Asia Khan (AK)	EDTEA: District Office: Environmental Planning	0824618669	asia.khan@kznedtea.gov.za
Liam Sanders (LS)	EDTEA	079 495 5759	Liam.Sanders@kznedtea.gov.za
Natasha Brijlal (NB)	EDTEA	079 898 0491	Natasha.Brijlal@kznedtea.gov.za
Werner Botha (WB)	Assmang/ CRDC	082 411 1656	wernerb@feralloys.co.za
Carlos Magalhaes (CM)	Assmang/ CRDC	063 524 3284	carlosmagalhaes@assore.com
Mel Pillay (MP)	Zutari	073 0334306	mel.pillay@zutari.com
Rowan Albertyn (RA)	Zutari	079 886 3414	rowan.albertyn@zutari.com
Jeanne-Louise Wiese (JLW)	Zutari	073 163 6409	jeanne-louise.wiese@zutari.com
Natalie Way-Jones (NWJ)	Zutari	083 254 6602	natalie@nwjenviroconsulting.co.za

Apologies

No formal apologies were received.

Meeting Minutes

Item	Topic Discussion	Action	Responsibility
1	Welcome and Attendance Jeanne-Louise Wiese (JLW) from Zutari welcomed all attendees. All meeting attendees introduced themselves. JLW presented the housekeeping rules for the online meeting. An online attendance register was available via the Google forms link in the chat window.		
2	Apologies No apologies were recorded.		
3	Project Description Mel Pillay (MP) from Zutari presented the slides attached in Appendix A. MP provided an overview of the project, describing the intention of the applicant and location of the 3 development areas within the Assmang-owned project boundary for assessment in the EIA. MP explained the distinction between the actual proposed 609 ha development footprint and the remaining parts of the study areas. The proposed development footprint comprises the light/ logistics/ medium industry, internal road network and vacant land for future road network (KwaXimba interchange). The remaining parts of the study areas, excluded from the development footprint are designated for conservation/ existing rural residential zoned areas and road reserves and electrical servitudes. The study area is divided into 3 proposed development areas for which separate authorisations could be obtained, or a combined authorisation. MP highlighted the existing challenge of encroachment of informal settlements on parts of the project boundary. MP outlined the bulk infrastructure requirements to support the proposed development. Water, electrical, including 21 mini substations, and sewer services will run within the proposed internal road network road reserves. MP explained the project structure and model and the roles of Zutari, Phelamanga and Assmang/ Cato Ridge Development Company (CRDC)- one of these entities will be the applicant on the Application for Environmental Authorisation (EA). Importantly, the outcome of the Environmental Impact Assessment (EIA) will inform what parts of the sites can be sold for further development. Specific requirements will be placed on the future third party developers, based on a detailed legal review. Additional permits and licenses, including Water Use Licenses, and activity-specific infrastructure will be the responsibility of future property owners/ developers. Post Meeting Note: IT was confirmed that CRDC will be the applicant for the EIA Application. MP outlined the status of the KZN Sandstone Sourveld on the site and the biodiversity offset planning process being led by Mr Doug MacFarlane of EcoPulse. The process will involve engagement with eThekweni Environmental Planning and Climate Protection Department (EPCPD) and Ezemvelo KZN Wildlife (EKZNW). MP explained that the		

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	biodiversity offset is being run separately from the EIA process but that the results would feed into the EIA reporting.		
4	Approach to the EIA application process MP outlined the approach to the EIA process, explaining the 3 separate screening reports that had been generated for the 3 proposed development areas, to form part of the Application for EA. The results had informed the Terms of Reference for the specialists. MP explained the uncertainty around the ultimate third-party developer and end-user plans for the sites. He outlined the assumptions adopted in the assessment of the applicability of the listed activities in terms of the 2014 National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA) EIA Regulations, as amended. MP described the 3 development areas in terms of the Listing Notice 3 geographic. MP outlined the applicable listed activities in terms of Listing Notice 1, 2 and 3. MP explained that eThekweni Municipality propose a bulk sewer pipeline to serve the Cato Ridge area. MP outlined the specialist studies to be included in the EIA process including studies completed during the pre-feasibility study (PFS). The specialist studies had been informed by the outcome of the screening reports. MP explained that the traffic study was not based on a specific layout but had been undertaken at a high level due to the uncertainty around the ultimate third-party developer and end-user plans for the sites. He requested guidance on the level of detail required in the Traffic Impact Assessment.		
5	Public Participation MP outlined the Public Participation (PP) activities to date. He presented the Draft PP Plan and explained that further engagements with the Ward Councillor are planned to follow the local government elections on 1 November. An upcoming Strategic Focus Group with the community leadership is planned for 15 November which will be confirmed in light of recent events.	Strategic Focus Group meeting date to be confirmed. Ward councillor engagements to be confirmed.	Zutari Zutari
6	Discussion and Questions		
6.1	Scope of Traffic Impact Assessment MP requested confirmation on the level of detail required for the traffic analysis. He stated that a detailed TIA had not been completed. Natasha Brijlal (NB) queried whether there had been consultation with the eThekweni Transport Authority (ETA) or the KZN Department of Transport (DOT).	Further engagement with ETA and DOT to confirm the level of detail required/ scope of TIA	Zutari

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	Rowan Albertyn (RA) responded that during the PFS, extensive consultation had been undertaken with DOT and with the South African National Roads Authority Limited (SANRAL). NB stated that the road authorities would be able to guide the level of detail required for the traffic analysis. NB stated that, given that there was uncertainty around the ultimate activities on site, the cumulative traffic impacts would need to be assessed. She stated that the roads authorities would have details on other proposed developments in the area and provide guidance on the need for road upgrades, etc. MP stated that further consultation would be undertaken with the road authorities. He stated that the surrounding road network had been assessed in terms of the initial traffic analysis, and this assessment was based on anticipated traffic volumes from the proposed development. He stated that currently there was no TIA and no Environmental Management Programme (EMPr) that addressed traffic impacts. RA stated that both DOT and ETA had been consulted, but the focus had been on the provincial road network. Certain proposed internal roads would be transferred to the Municipality in the future and thus ETA had been consulted.		
6.2	Civil Aviation Authority MP requested guidance on the approach with the Civil Aviation Authority.		
6.3	Kacy Rengasamy (KR) stated that she had had connection issues and requested that MP show her the project location and description slides. The slides were displayed.		
6.4	Assessment of Health Impacts on Adjacent Communities KR stated that she noted the proximity of the existing residential community to the proposed development, in particular, the light industry, and warehousing land uses. She queried whether potential impacts on these communities had been considered, in the light of the current situation in the South Durban Industrial Basin. Historically, general industrial and industrial land uses have been positioned closed to communities, and these communities had since raised concerns with EDTEA regarding noise, odour and traffic impacts. She stated that she is aware that there is uncertainty regarding potential future tenants. She stated that it may be necessary to restrict certain types of activities close to residential areas based on the types of impacts anticipated. MP stated that the existing rural residential areas had been considered in the planning. Engagements had been undertaken with the communities since the PFS phase, and further engagements would take place during the EIA process. MP stated that the traffic impacts had been considered. MP stated that odour impacts were not anticipated. Noxious industries were excluded from the proposed future land uses. He stated that the impacts of traffic and noise from trucks would be considered. MP stated that the Cato Ridge area was predominately industrial. MP stated that, during initial engagements with the communities, support was shown for development in the area based on their need for economic opportunities. Further discussion with communities will take place regarding identified impacts. The nature of the impacts would	Noise, odour and traffic impacts on adjacent communities to be considered. Restrictions on types of activities to be based on potential impacts on communities.	Zutari Zutari

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	inform whether certain activities would need to be precluded. RA stated that during the concept and PFS phases, extensive consultation had been undertaken, particularly with the KwaXimba community adjacent north of the project boundary. The consultations had included potential job opportunities. RA stated that the end land uses were not known at this stage, and the applicant intends to release land for development. RA pointed out that there was a gradation in size of the industrial stands, with smaller stands immediately adjacent to the KwaXimba community. These smaller stands could serve as business incubators carpentry workshops, artisan trading to benefit the communities. Although the land is privately owned, there is a very strong traditional council sentiment as the land is surrounded by traditional council areas and also areas encroached by the KwaXimba and Fredville communities. The land uses that are being proposed are large-scale logistics employment opportunities but also employment opportunities due to location within a traditional area.		
6.5	Gradation of Land Uses to Mitigate Environmental, Human Health and Wellbeing Impacts Ian Felton (IF) stated that learning and experience with the UPL matter need to be taken into account in this consideration, such as land uses between industrial and residential land uses. He stated that in General Industry land uses can include some heavy-impacting uses, or Mixed land uses which could include storage and warehousing. He stated, in addition to the need for assessing the impacts on communities, a gradation of land uses between residential and industrial or mixed land uses is required to create a buffer between the land uses. This would mitigate potential environmental, human health and wellbeing impacts. Alternate land use layouts should be assessed that could serve as buffers. IF stated that EDTEA would need to clarify what types of land uses would be permitted under light industrial, general industrial or mixed-use zones. These restrictions may be more stringent than those provided in the town planning scheme, based on the anticipated environmental impacts. RA responded that extensive and ongoing communication with the communities on the doorstep of the proposed development had revealed their support for the proposed development. There had been plans for the development of the site since the early 1950s. He stated that land uses would be filtered in terms of the proximity to the communities and no intrusive land uses would be permitted adjacent to communities. RA stated that Assmang wishes to maintain a good relationship with the communities.	Gradation of land uses between residential and industrial or mixed land uses. Assess alternate land use layouts to serve as buffers. EDTEA to clarify permitted land uses per zone.	Zutari Zutari EDTEA
6.6	Long Term Environmental Liability and Management Control of the Landholding IF stated that, arising from the Cornubia/UPL matter, there would need to be clarity on the proposed incumbent structure and on the transfer of obligations of the EA through to other landowners or land users, to ensure the EA requirements are transferred. The long term obligations to protect the environment and the health and wellbeing of people must be maintained. An overarching structure to ensure management control of the landholding must be established to ensure, for example, that collective stormwater management and open space systems are maintained.	Evaluation of proposed alternative management structures/entities and arrangements for ensuring compliance with the EA where EA conditions relate to the management of the total landholding or	Zutari/ Assmang/ CRDC

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	RA responded that the EA conditions should be included in the sale agreements to ensure continuity of control. IF stated that this approach did not work where there were overarching land management issues that affect the entire landholding. In such a case, an individual landowner cannot be held liable e.g. the maintenance of the stormwater, sewer or electrical infrastructure. To this end, the establishment of a property owners association or other entity must be considered to assume responsibility for the overarching management and control. Certain aspects may be transferred to the eThekweni Municipality. Each landowner would have their obligations. IF stated that this was an example of a framework EA and the long-term liability for such a framework EA must be clarified. Conditions would then be cascaded down to the individual landowners/ land users. RA stated that, at this stage, it is anticipated that the responsibility for the water, sewer and roads would be transferred to the Municipality for perpetual maintenance. RA stated that this would be clarified at a later stage as it is likely that a logistics industrial hub would be created by a developer that would privatise and establish a body corporate entity. He stated that it was too premature to define this. MP stated that IF's comments would be considered, and further discussions would be held with Assmang and CRDC relating to options to ensure that impacts on adjacent communities were avoided through an arrangement for shared responsibility, beyond the sales agreements.	collective management measures.	
6.7	Distinction between CRDC and Cato Ridge Logistics Hub Consortium RA clarified that CRDC is wholly owned by Assmang and should not be confused with the Cato Ridge Logistics Hub Consortium that has been promoting development in this area. The Logistics Hub Consortium are not landowners within the EIA footprint although they have promoted development on the said footprint without the involvement of CRDC and Assmang; Assmang and CRDC are the landowners. The proposed EIA process does not involve the Cato Ridge Logistics Hub Consortium.		
6.8	Biodiversity Offset Planning IF stated that, in terms of the biodiversity offset issue, there had been some discussion previously. He stated that it was critical prior to lodging an Application for EA there would need to be certainty on the feasibility of offsetting the Critical Biodiversity Areas (CBAs). He stated that EDTEA should be upfront in identifying fatal flaws in the pre-application stage that could impact negatively on the outcome of the assessment. He stated that he had had discussions with both EPCPD and EKZNW and the biodiversity offset process would be one of the largest hurdles. IF stated, that, based on the current offset ratios and the fact that approx. 600 ha would need to be offset, approx. 19 000 ha of similar grassland would need to be secured in perpetuity. He stated that this is unlikely to be available. He stated that for a "like for like" offset, the potential feasibility is next to zero. IF stated that there was a significant difference between a "trade-off" and a "biodiversity offset". He stated that there would need to be motivation to both EPCPD and EKZNW regarding a possible viable trade-off option, which is what Doug was now assessing.	Biodiversity offset options/ trade-offs to be finalised with EDTEA, EPCPD and EKZNW prior to lodging Application for EA	Zutari

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	He stated that securing biodiversity offsets or achieving a high degree of surety for offsets would need to precede the lodging of an application so that the Department could assess the extent of offset requirements, whether there were sites available to meet those objectives, and whether it is feasible to establish those offsets. This is due to the limited timeframes for the EIA process. He stated that a biodiversity specialist offset study was not included in the list of specialist studies for the EIA. He stated that a Biodiversity Offset Management Plan would be required to allow for gradual implementation of the offset management as the development progresses. IF stated that the District Office should identify an official to participate in the biodiversity offset process being run by EcoPulse and that he would like to be included in the process. The process would have implications at the Provincial scale and issues would need to be resolved prior to lodging of the Application for EA. IF stated that a negative decision would be issued if a viable offset option could not be identified. MP responded that Doug MacFarlane was in the process of developing an initial framework and approach for the biodiversity offset process, and then would engage further with Assmang, EKZNW and EPCPD. Further feedback on viable options was expected before the end of 2021. MP stated that a site visit was scheduled for 19 November with EcoPulse and the botanical specialist David Styles. Following this, further engagement with Assmang, EPCPD and EKZNW would take place. MP stated that the biodiversity process was seen as separate from the EIA process, but that the outcomes of the biodiversity process would be incorporated into the EIA process. He acknowledged that if there was no viable biodiversity option at the time of submission of the final EIAR, then EDTEA could not grant a positive EA. MP stated that, based on the current timing for the biodiversity offset process, the Application for EA would be submitted in January 2021 to start the formal regulatory process. MP acknowledged that a biodiversity offset at a ratio of 30: 1 may not be viable based on the extent of land required. The applicant would need to assess the viability of selling the land for development once the offset requirements are defined. RA stated that from a development facilitation perspective, he had been involved for a few years on the project. He stated that from the inception, the intention of the client, who is not a developer, and whose interest is the operation of the smelter, was to release land sustainably and with some economic benefit to the AmaXimba community specifically, and to the broader community. RA asked whether there was any alternative, if a trade-off was not	EDTEA District Office and IF to participate in the biodiversity offset process	Zutari/ EcoPulse

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	feasible, to releasing land to the community, which was the default expectation. RA stated that there was already a Local Area Plan (LAP) for the Cato Ridge area that supports light industrial, as does the SIP 2 programme that is reliant on the development of Cato Ridge to unlock the decongestion at the Port. He stated that these factors need to be considered to be of equal importance as the ecological features of the site. RA stated that he was concerned that the trade-off or negotiations are happening outside and prior to the EIA process. As such, he is concerned that there is no set timeframe to achieving clarity from the Department. RA stated that if there are further delays, there would be increasing pressure through encroachment of the land by the surrounding communities. The community may not see any prospect of economic upswing in the area, with the threat of further land invasion, illegal sand mining, overgrazing and veld fires. RA stated that the landholding was virtually surrounded by traditional areas. As such, this is a traditional area. He stated that, although he acknowledged the position of IF, there is an economic and social lens that was currently being disregarded. MP stated that the economic and social aspects would be considered in the EIA process. He stated that the biodiversity offset process would focus on biodiversity aspects only. Further negotiations between EcoPulse, EKZNW, EPCPD and Assmang would take place through the biodiversity offset process. MP stated that it would be challenging to achieve a balance. RA stated that, at the inception phase of the project, the risk of land claims had been evaluated. He stated that he had been surprised to learn that there were no land claims on the property, given the proximity to traditional communities. He explained that during initial engagements with the Amaximba, it had become clear that they want development in this area. He stated that the Amaximba had realised that lodging a land claim may hinder this development. RA explained that the Amaximba wanted to see economic and logistics development as they had become aware of through the media. He stated that limiting the assessment to the ecological lens may compromise the development and lead to greater loss of biodiversity, based on the proximity of the communities. KR stated that, in terms of offset planning, she was in agreement with IF position, which was the Departmental position. She stated that the Department had learned many lessons from previous developments where there were offsets involved. She explained that the Department had experience in this regard and that NB had been involved in offset planning in the eThekweni District. She stated that lessons had been learned specifically with regards to the long-term planning for offsets. She stated that she acknowledged RA's position and that this was a proposal that had been presented to the Department. She stated that the site had been selected by the developer based on specialist input, but the onus was on the applicant to prove that this is the most suitable development for this site. She acknowledged the ecological concerns that were familiar in the area. She acknowledged that the type of development may be considered on the basis of land use planning. She stated that the biodiversity concerns cannot be avoided. The ecological value of the area and the applicant had taken cognisance of this, as is evident from the large conservation area proposed within the project	Motivation to the Department to prove that this is the most suitable development for	Assmang/CRDC, Zutari

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	boundary. She stated that the Department was happy to note that biodiversity offset planning was underway. KR emphasised that the focus at this stage of the process should be on the biodiversity offset planning. She stated that this should not be considered too late in the process. She explained that the applicant should be aware of the long-term implications of managing biodiversity offsets, including the need for large budget allocated for long term conservation at the offset sites. She stated that agreements would need to be established, for example, agreements with the landowner of the site if the site is not owned by the applicant. KR stated that fragmentation of the offset site should be avoided as this was not supported by EKZNW and EPCPD. She stated that a larger, contiguous area based on the hectare-equivalents required, was preferred as an offset. She stated that EKZNW, EPCPD, IF and the EDTEA eThekweni District Office should be engaged extensively upfront during the biodiversity offset process. MP stated that Zutari would notify Doug MacFarlane of EcoPulse to include the relevant officials in the biodiversity offset process, including the site visit proposed for 19 November. He stated that the Department was welcome to propose the inclusion of other officials as needed in this process. NB supported the position of IF and KR and stated that she and Asia Khan (AK) had stressed in previous meetings the importance of exploring the offset requirements prior to the EIA process.	this site EKZNW, EPCPD, IF and the EDTEA eThekweni District Office to be included in the biodiversity offset consultation process	Zutari, EcoPulse
6.9	Alternatives KR emphasised that the comments made by the Department officials were based on lessons learned. She stated that they were not objecting to the proposed development and understood the provincial economic value of the proposal. She stated that the project team would need to prove that this as the best site for the development. She queried whether more suitable alternative sites or layouts had been investigated. She stated that alternatives would be very important in this project. MP responded that alternative sites and layouts would be assessed as part of the Scoping process, He explained that the current proposal had evolved from previous layouts	Alternative layouts and sites to be investigated to support the development proposal.	Assmang/CRDC, Zutari
6.10	Water Use Licensing KR stated that it had been mentioned that the Water Use Licensing (WUL) process would not be undertaken at this stage. She requested that the project team review this position, as there are wetlands on the site and, based on the current proposed land uses, a WUL or General Authorisation would be required from the Department of Water and Sanitation (DWS). She stated that, based on previous experience and to prevent delays once the authorisation is issued, it was best to initiate the WUL process upfront. She added that offset planning could also delay the WUL process and should be undertaken upfront.	To consult with the DWS on the need for and timing of the WUL process	Zutari

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	MP stated that he understood the WUL process to be a lengthy and critical process. He stated that, from his experience, the DWS would not issue a WUL until other permits and approvals were in place. He explained that once there was certainty on the outcome of the current processes, the team would initiate the WUL process. He stated that, in the interim, DWS would be consulted as part of the EIA process, using the same format of presentation with a water use focus in the discussion. He stated that the team would present their proposed approach to the WUL process to DWS to obtain response and guidance from DWS. NB queried whether the impacts on wetlands would be included as part of the biodiversity offset planning.		
6.11	Wetland Delineation Assessment KR queried whether the wetland delineation was one of the identified specialist studies and if not, it should be added. MP stated that a wetland delineation study was done as part of the PFS based on the broader study area and EcoPulse had been appointed to refine this study based on proposed development footprint. He stated that a standalone wetland delineation report and wetland impact assessment would be prepared by EcoPulse.		
6.12	Sewer Options NB queried whether the proposed sewer pipeline would tie into an existing wastewater treatment works (WWTW) and whether there was confirmation of capacity at this WWTW to accept the effluent from the proposed development. MP stated that the project would tie into the Hammarsdale WWTW and spare capacity at this WWTW had been confirmed by eThekweni Water and Sanitation, however, an upgrade would be needed to service the full development. He explained that the upgrade of the WWTW would need to tie into the new proposed trunk sewer proposed by eThekweni Water and Sanitation. He indicated on the site layout plan that the proposed trunk sewer would follow Eddie Hagen Drive and cross Area 1. He stated that a KMZ file of the proposed trunk sewer route had been received from eThekweni Water and Sanitation, who had indicated that it would likely take 7-8 years to address these infrastructure requirements. He stated that eThekweni Water and Sanitation wanted to know to try and align with the horizon for the proposed development, which was 5-10 years. NB stated that she just met with the Municipality on the issue of projects that are reliant on WWTW upgrades. She stated that the Department was faced with the challenge in many cases where the timeframes for upgrade of the WWTW did not tie in with the development timeframes leading to significant project delays. She explained that the delays in WWTW upgrades related to finer details, such as funding, etc. She stated that, in light of this challenge, alternative sewer options should be considered should there be delays in the WWTW upgrade. MP stated that the use of on-site septic tanks had been tabled to service initial development and to address any stop-gaps between the proposed	Alternative sewer options should be considered should there be delays in the WWTW upgrade.	Assmang/CRDC, Zutari

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	development timing and eThekweni Water and Sanitation development timing. He stated that further engagement with eThekweni Water and Sanitation on the alignment of timing would be undertaken as part of the EIA process.		
6.13	Listed Activities KR queried the inclusion of applicability of Listing Notice 1 listed activities 9 and 45 in relation to sewage and sanitation. She stated that activity 9 speaks to installing and establishing (no existing) while activity 45 speaks to expansion. JLW responded that both activities had been included as there is existing infrastructure in the area that may be upgraded and there would also be new bulk services infrastructure. KR responded that, as such, the infrastructure would not be new as there is existing bulk infrastructure and the proposed development is tying into this infrastructure. She stated that this activity is interpreted as “expansion” rather than as a new installation. She stated that activity 45 would be applicable, not activity 9. JLW stated that the thinking was that certain activities were triggered on certain proposed development areas and not all the proposed development areas have existing infrastructure. She explained that for certain of the proposed development areas, the activity would be related to new infrastructure rather than expansion. KR requested that this distinction be clarified in the reports and on the Application for EA. NB stated that this should be clearly outlined in the Application for EA in the relevant table of listed activities, along with an explanation as to why that activity is triggered. MP stated that the applicability of listed activities per development area would be outlined in the Application for EA. MP suggested that Zutari send the Department a draft version of the Application for EA prior to formal submission to ensure alignment.	Specify in the reports and on the Application for EA which listed activities are applicable to the 3 proposed development areas.	Zutari.
6.14	Rationale for 3 Development Areas RA queried whether it would be useful to explain the rationale for the 3 separate development areas. MP stated that this had been tabled in previous engagements with EDTEA. He asked attendees whether RA should explain this rationale. KR responded that this would be helpful.		

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	RA explained that the intention is to submit one Application for EA but seek separate EAs for the 3 proposed development areas to prevent delays in implementation. MP added that the Application for EA would be divided into 3 sections referring to the 3 proposed development areas. He explained that the environmental sensitivity and the financial viability of the 3 proposed development areas vary. He explained that areas closer to the N3, R103, main roads and railway line have greater value for the applicant. MP explained that the 3 proposed development areas would be assessed separately and there were expected to be unique for each proposed development area. He explained that should parts of the proposed development areas be compromised due to sensitivities, the footprint could be developed on other parts of the proposed development areas. He stated that appeals may be lodged on certain proposed development areas. He stated that the applicant required certainty on what parts of the proposed development areas could be developed to inform the viability of the proposed project.		
6.14	Pre-Application Requirements JLW queried what the Department required in terms of progress and format of the biodiversity offset study to support the submission of the Application for EA. KR stated that, prior to submission of the Application for EA, the meeting on 19 November with EDTEA, EKZNW, EPCPD and EcoPulse must have been undertaken. RA queried whether, in a worst case scenario, the applicant could submit an Application for EA if there was no clarity on the biodiversity offset process. KR stated that the Application for EA could be submitted in this scenario, but the biodiversity offset process was one of the fatal flaws in the application. KR stated that, prior to submission of the Application for EA, a copy of the Draft Scoping Report (DSR) should be sent to the Department for review. The DSR could still be circulated for public review. She explained that this afforded the Department an opportunity to provide guidance on the DSR prior to the formal EIA process. She stated that the Department had found that reviewing the DSR had proven valuable in supporting the EIA process. JLW queried the review timeframes for the Departmental review of the DSR. KR confirmed that 30 days was required for EDTEA review of the DSR.	Prior to submission of the Application for EA, a copy of the Draft Scoping report should be sent to the Department for review for 30 days.	Zutari

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6.15	Site Visit on 19 November MP queried whether KR and NB could be invited to the full-day biodiversity offset site visit on 19 November to obtain clarity on the timing of submission of the Application for EA. KR agreed that she could form part of the site visit. MP stated that invitations for the site visit on 19 November would be sent to AK, IF, KR and NB. IF stated that he was available on the proposed dates and that he would put this into his diary. NB provided details of her Manager Nombulelo Zungu (Nombulelo.Zungu@kznedtea.gov.za) for inclusion in circulation of the invitation to the site visit.	To circulate invitation for the site visit on 18/ 19 November to the relevant EDTEA officials	Zutari
7.	Way Forward KR stated that this meeting had gone a long way in addressing some of the Department's concerns. MP stated that he understood the value of further ongoing consultation with EDTEA to align with the Department's values and expectations. He stated that further guidance would be sought from the Department prior to the formal EIA process regarding.		
8.	Close of Meeting MP thanked attendees for their participation. He stated that minutes of the meeting would be compiled and distributed. The meeting was closed at 12h00.		

During the meeting, the following comments were captured on the Google form attendance register:

Name	Comments	I would like you to also notify the following person/s (please provide contact details where possible):
Werner Botha	-	George Karsten <GeorgeKarsten@assore.com>
Kacy Rengasamy	Layout consideration of rural communities and impacts on them. Consider gradient of type of land uses as we move away from the communities and toward the centre of the development. Review of Listed activities triggered to be broken down between each development area. Engagement with DWS needed to determine WULA/General Authorisation process to be followed.	

Name	Comments	I would like you to also notify the following person/s (please provide contact details where possible):
	Biodiversity Offset Planning considerations must be extensive based on further engagement with EPCPD, EKZNW and EDTEA. Alternatives to be presented to motivate for why this location, layout and type of development is the most suitable. Municipal Service Level Agreements for Sewage treatment. Recommended circulation of the draft Scoping report to EDTEA for a 30 day comment period prior to lodging of the application. It is recommended that a 2nd pre-application meeting be held with the District office closer to the intended date of submission of the application to ensure our comments have been addressed.	

APPENDIX A: PRESENTATION SLIDES