



CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD

**SPATIAL PLANNING AND ENVIRONMENT
ENVIRONMENTAL MANAGEMENT DEPARTMENT**

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Environmental & Heritage Management

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Zutari (Pty) Ltd
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By email: Corlie.Steyn@Zutari.com

Attention: Corlie Steyn

DRAFT BASIC ASSESSMENT REPORT: PROPOSED MACASSAR WASTEWATER TREATMENT WORKS (WWTW) CAPACITY EXPANSION AND REFURBISHMENT OF ASSOCIATED INFRASTRUCTURE ON ERVEN 1205, 703 AND 708, MACASSAR (DEA&DP REF NO.: 16/3/3/1/A3/39/2054/24)

Reference is made to the Draft Basic Assessment Report (DBAR), dated October 2024, prepared by Zutari (Pty) Ltd for the proposed Macassar Wastewater Treatment Works capacity expansion and refurbishment of associated infrastructure on Erven 1205, 703 and 708, Macassar.

For background purposes, it should be noted that Environmental Authorisation (EA) was issued on 01/07/2016 to the City of Cape Town by the competent authority for the upgrade and expansion of the Macassar WWTW, and construction subsequently commenced. However, with the finalisation of the detailed design, the newly appointed design engineers have identified alternative technology options that will enable the works to run more efficiently and improve the quality of the effluent being discharged to the estuary. The new design constitutes additional listed activities and therefore Environmental Authorisation is now required.

This application has been assessed in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998). Please find consolidated comments from the City of Cape Town:

Water and Sanitation: Technical Services – Chanee Johnson (Annexure A.1-A.2)

Based on the current assessment, the water infrastructure does not appear to be affected. The sewer infrastructure traversing the site must be taken into consideration and protected throughout the duration of the proposed development. Water and Sanitation can accommodate the proposed development, subject to the following conditions:

- The applicant must apply for the required wayleaves before construction commences.
- The relocation or positions of new water and sewer reticulation must be discussed with the Regional Reticulation officials.
- Non-potable water must be used for onsite irrigation.

Please refer to Annexure A.1 – A.2 for the full and detailed comment from Technical Services, as well as the layout of existing services located on the property in question.

Urban Mobility: Integrated Transport Planning: Transport Impact Assessment and Development Control – Bill Jones (Annexure B)

Transport has no comments pertaining to the proposed upgrade and expansion of the Macassar WWTW.

Please refer to Annexure B for the comment from Transport Impact Assessment and Development Control.

Urban Waste Management: Integrated Planning and Waste Strategy – Anela Kondlo and Jo-Anne Petersen

The appointed contractor responsible for the waste generated pre- and post-construction phases must ensure compliance with the City's Integrated Waste Management Bylaw and must therefore be accredited to offer any services that relates to the transport and disposal of all waste.

It should be noted that sludge may no longer be disposed of at landfill sites. Alternatives must be sought for the disposal of the sludge or it will have to be treated to be more stable prior to acceptance at a landfill site.

In light of the above, the following statement in the Environmental Management Programme (EMPr) must be corrected, as legislation prohibits disposal of sludge at a landfill site: *"Sludge from the lagoons will need to be tested and if classified as hazardous sludge, it will need to be disposed of at a hazardous landfill site"*.

Community Services and Health: Environmental Health – Claude Byilingiro (Annexure C)

Environmental Health has no concerns related to the proposed development and has no objection to the continuation of the work currently in progress.

Please refer to Annexure C for the full comment from Environmental Health.

Community Services and Health: Specialised Environmental Health Services, Air Quality Management – Rabelani Gundula (Annexure D)

Air Quality Management finds the proposed development desirable, subject to a number of technical requirements being addressed in the report and the Environmental Management Programme (EMPr).

Please refer to Annexure D for the full comment from Air Quality Management.

Economic Growth: Enterprise and Investment, Investment Facilitation – Lizelle Arendse

Investment Facilitation has no further comments.

Urban Planning and Design: District Planning and Mechanisms –Mishka Jalim (Annexure E)

It can be confirmed that the proposed WWTW is in line with the Municipal Spatial Development Framework (MSDF) and Integrated Development Plan (IDP) 2022 – 2027.

Please refer to Annexure E for the full comment from District Planning and Mechanisms.

Urban Planning and Design: Urban Design – Ruan Mills (Annexure F)

Urban Design has no major concerns / comments pertaining to the subject DBAR. As such, the proposed upgrades at the Macassar WWTW facility is supported accordingly, on the basis of the conditions and circumstances outlined in the DBAR and specialist reports.

Please refer to Annexure F for the full comment from Urban Design.

Energy: Electricity Generation and Distribution – Charise de Villiers

The project site falls within an Eskom supplied area. Therefore, Electricity Generation and Distribution has no comment on the proposed development.

Environmental Management Department

Biodiversity Management – Julia Wood (Annexure G)

Biodiversity Management has a number of concerns related to the proposed development and the impact thereof on the surrounding environment and conservation area. A number of questions were also raised with regards to the design and operation of the expanded WWTW. The EAP and project team is requested to provide clear and detailed responses to the list of concerns and questions raised by Biodiversity Management in the report to follow.

It should be noted that Biodiversity Management has provided specific comments on the Biodiversity Offset Memo (Appendix G.8.2), dated 25/10/2024, compiled by Scientific Terrestrial Services (Pty) Ltd, directly to the consultants, i.e. Zutari, on 28/10/2024.

Please refer to Annexure G for the full and detailed comment from Biodiversity Management.

Environmental and Heritage Management: Heritage Section – Muneerah Solomon

The Draft Basic Assessment Report (DBAR) correctly acknowledges that Section 38 (8) of the National Heritage Resources Act (Act 25 of 1999) is triggered. A Notice of Intent to Develop (NID) application was therefore made to Heritage Western Cape (HWC). HWC responded on 25/10/2023 that since there is reason to believe that the Proposed Wastewater Treatment Works on Erf 1205 Macassar and Erven 703 and 708, Firgrove will impact on heritage resources, HWC requires that a Heritage Impact Assessment (HIA) that satisfies the provisions of Section 38(3) of the NHRA be submitted. This HIA must in addition have specific reference to a Palaeontological Impact Assessment.

The Heritage Section has no objection to the above proposal and supports the specific studies requested by HWC.

Furthermore, it should be noted that the process is currently ongoing and the follow-up response from HWC is awaited. The Environmental Assessment Practitioner (EAP) is requested to include the final response from HWC in the final report.

Environmental and Heritage Management: Environmental Section – Lauren King

Having reviewed the DBAR and associated specialist reports and Environmental Management Programme, the Environmental Section has the following remarks and comments:

- It should be noted that the DBAR incorrectly refers to Erven 703 and 708, Firgrove, which are two other erven located in the industrial area to the east of the Eerste River. This must be corrected throughout the report to refer to Erven 703 and 708, Macassar (not Firgrove).
- Treated effluent from the Macassar WWTW is currently being discharged into the Eerste River estuary, with a relatively low ecological importance. It is noted that the proposed works will result in a higher volume of treated effluent, but the new treatment processes will provide better quality treated effluent to be discharged, if operated correctly.
- In order to accommodate the current reality of ever expanding development within the Helderberg Region, there is a major need for the upgrade and expansion of the Macassar WWTW, which is noted and supported. However, the impact of the increased volume, albeit of better quality, treated effluent to be discharged into the Eerste River estuary is of concern from an environmental point of view.
- In light of the above, it is of utmost importance that the mitigation measures and recommendations put forth by the Freshwater Specialist be taken into consideration during the design, construction and operational phase of the proposed development. The recommendation of the freshwater specialist to further explore possibilities for the re-use of treated effluent in the area in future, in an effort to further reduce the volume of the discharge to the Eerste River, is strongly supported.
- Special notice must be taken of comments by the Biodiversity Branch. The comment from the environmental section does not preclude requirements and offsets raised by Biodiversity.

Environmental Management Programme (EMPr)

- The EMPr must include all mitigation measures put forth by the relevant specialists under the relevant sections of the EMPr.
- Method Statements (MS) for the works to take place along the periphery of the project site, i.e. adjacent to the Eerste River area and conservation area, must be submitted to the satisfaction of Biodiversity Management and Environmental and Heritage Management Branches prior to these works commencing. This includes the placement of the power line, as well as the crossing of the Eerste River for which the final method of crossing has not yet been determined.
- As the successful operation of the Macassar WWTW in future is of critical importance, it is recommended that a stand-alone section titled Operational Phase Environmental Management Plan be added to the EMPr, in order to address all mitigation and emergency measures that may be required during the Operational Phase.
- It is further recommended that an Alien Invasive Species Management Plan be appended to the EMPr. Such a plan must include maps indicating where clearing is to be done, including all follow-up clearing, the methods to be used for clearing, as well as the frequency and timing of these activities.

Conclusion

Having reviewed the Draft Basic Assessment Report (DBAR) and circulated it to the relevant departments/branches, the proposed development, cannot be fully supported yet. In principle support can be given subject to the above technical requirements, concerns, questions and comments to be included and addressed in the report to follow.

Should you wish to discuss the above comments, please do not hesitate to contact the Environmental and Heritage Management Branch via e-mail on the details provided on the letterhead of this document.

Yours sincerely



Maurietta Stewart

**Acting Manager: Environmental and Heritage Management
Environmental Management Department**

Annexures:

Annexure A.1-A.2: Water and Sanitation: Technical Services – Chanee Johnson

Annexure B: Urban Mobility: Integrated Transport Planning: Transport Impact Assessment and Development Control – Bill Jones

Annexure C: Community Services and Health: Environmental Health – Claude Byilingiro

Annexure D: Community Services and Health: Specialised Environmental Health Services, Air Quality Management – Rabelani Gundula

Annexure E: Urban Planning and Design: District Planning and Mechanisms – Mishka Jalim

Annexure F: Urban Planning and Design: Urban Design – Ruan Mill

Annexure G: Environmental Management Department: Biodiversity Management – Julia Wood

CC: Department of Environmental Affairs and Development Planning (DEA&DP)

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