



5. Applicable Listed Activities:

5.1 After considering the information provided in the application form, the Department concurs that the proposed development constitutes the following listed activities as defined in terms of the EIA Regulations, 2014: (as amended), namely:

- 5.1.1 Activity 27 of Listing Notice 1 of the EIA Regulations, 2014 (as amended).
5.1.2 Activity 12 of Listing Notice 3 of the EIA Regulations, 2014 (as amended).

5.2 A Basic Assessment process must be followed in order to apply for Environmental Authorisation. Only those activities applied for shall be considered for authorisation. The onus is on the applicant to ensure that all the applicable listed activities are applied for and assessed as part of the Basic Assessment process.

5.3 In the event that the development is authorised, the Department will exercise its discretion granted in terms of Regulation 25(4) of the EIA Regulations, 2014 (as amended) and issue a replacement of the existing valid Environmental Authorisation issued on 07 July 2017, to include the amended project scope and description within the authorised project description.

6. Screening Tool, Protocols and Specialist Assessments:

6.1 This Directorate notes that a Screening Report (dated 26 August 2024) and confirmation of the relevant specialist studies to be conducted have been provided. A Site Sensitivity Verification Report ("SSVR") dated 05 September 2024 has also been provided by the Environmental Assessment Practitioner ("EAP").

6.2 The following specialist assessments were identified in the Screening Report (dated 26 August 2024):

- 6.2.1 An Agricultural Impact Assessment;
6.2.2 An Archaeological and Cultural Heritage Impact Assessment;
6.2.3 A Palaeontological Impact Assessment;
6.2.4 A Terrestrial Biodiversity Impact Assessment;
6.2.5 An Aquatic Biodiversity Impact Assessment;
6.2.6 A Hydrology Assessment;
6.2.7 A Geotechnical Assessment;
6.2.8 A Health Impact Assessment;
6.2.9 A Socio-Economic Impact Assessment;
6.2.10 An Ambient Air Quality Impact Assessment;
6.2.11 A Plant Species Assessment; and
6.2.12 An Animal Species Impact Assessment.

6.3 Although the abovementioned specialist assessments were identified in the Screening Report (dated 26 August 2024), it was motivated that the following studies will not be undertaken for the following reasons:

- 6.3.1 An Ambient Air Quality Impact Assessment will not be conducted. The air quality impacts of the WWTW were assessed during the EIA process undertaken for the upgrade of the WWTW and the Environmental Authorisation issued on 07 July 2017 is still valid. The proposed refurbishment will not affect air quality and therefore, an Ambient Air Quality Impact Assessment is not required.

5. Screening Tool, Protocols and Specialist Assessments:

This Directorate notes that a Screening Report (dated 26 August 2024) and confirmation of the relevant specialist studies to be conducted have been provided.

A Site Sensitivity Verification Report ("SSVR") dated 05 September 2024 has also been provided by the Environmental Assessment Practitioner ("EAP").

The following specialist assessments were identified in the Screening Report (dated 26 August 2024):

1. An Agricultural Impact Assessment;
2. An Archaeological and Cultural Heritage Impact Assessment;
3. A Palaeontological Impact Assessment;
4. A Terrestrial Biodiversity Impact Assessment;
5. An Aquatic Biodiversity Impact Assessment;
6. A Hydrology Assessment;
7. A Geotechnical Assessment;
8. A Health Impact Assessment;
9. A Socio-Economic Impact Assessment;
10. An Ambient Air Quality Impact Assessment;
11. A Plant Species Assessment; and
12. An Animal Species Impact Assessment.

5.1 Although the abovementioned specialist assessments were identified in the Screening Report (dated 26 August 2024), it was motivated that the following studies will not be undertaken for the following reasons:

Ambient Air Quality Impact Assessment

An Ambient Air Quality Impact Assessment will not be conducted. The air quality impacts of the WWTW were assessed during the EIA process undertaken for the upgrade of the

WWTW and the Environmental Authorisation issued on 07 July 2017 is still valid. The proposed refurbishment will not affect air quality and therefore, an Ambient Air Quality Impact Assessment is not required.

This Directorate concurs with the EAP's motivation as to why an Ambient Air Quality Impact Assessment will not be required.

5.2 Geotechnical Assessment

A Geotechnical Assessment will not be conducted since a geotechnical investigation has been undertaken as part of the engineering scope and the Environmental Authorisation issued on 07 July 2017 is still valid. This Directorate concurs with the EAP's motivation as to why a Geotechnical Assessment will not be required.

5.3 Socio-Economic Impact Assessment

A Socio-Economic Impact Assessment will not be conducted. The proposed upgrade of the WWTW will improve the livelihoods of people living in areas serviced by the WWTW, which will have a positive impact on the socio-economic environment. The anticipated socio-economic impacts of the proposed development are considered positive in terms of job creation during both the construction and operational phases. As such, a Socio-Economic Impact Assessment is not warranted.

5.4 Civil Aviation Theme:

The proposed development is in line with the character of the area and will not pose a risk to any civil aviation activities either as an obstacle or in terms of communications. As such, a Civil Aviation Impact Assessment is therefore not warranted.

5.5 Defence Theme:

According to the SSVR, a Defence Impact Assessment or Compliance Statement is not required, since the low sensitivity identified in the Screening Report should be negligible.

According to the meeting record of the pre-application meeting held on 11 August 2023, it was advised that due to the proximity

of Denel, a Compliance Statement must be done. Considering that the Screening tool report identifies the defence theme as being of low sensitivity, please ensure the SSVR is updated to reflect that although a defence theme was originally deemed as necessary in the pre-application meeting, this is no longer warranted.

5.6 Studies conducted

The following studies have been/will be conducted:

1. An Agricultural Compliance Statement by Johann Lanz;
2. A Terrestrial Biodiversity Impact Assessment by Nick Helma Botanical Surveys;
3. An Aquatic Impact Assessment by IbasScience; and
4. An Archaeological and Heritage Impact Assessment, inclusive of Paleontology by Jayson Orton.

5.6.1 You are further advised that should any of the commenting authorities request any of the specialist studies identified in the Screening Tool and/or additional specialist studies, these will need to be undertaken.

5.6.2 Where an assessment protocol is prescribed for one of the environmental themes included in the Protocol (in this instance agriculture, animal species, aquatic biodiversity, archaeological and cultural heritage, and terrestrial biodiversity), the specialist assessment must comply with the Protocol.

5.6.3 Where a specialist assessment is required, but no specific environmental theme protocol has been prescribed and/or specialist assessments have been initiated prior to 09 May 2020, the level of assessment must be based on the findings of the site verification and must comply with Appendix 6 of the EIA Regulations, 2014 (as amended).

7. Exemptions:

The Department notes that you do not intend to apply for exemption from any of the requirements of the Public Participation Process as stipulated by Regulation 41, from any other provisions contained in the EIA Regulations, 2014 (as

5. Zutari confirms the content of the SSVR.

5.1 Noted, thank you.

5.2 Noted, thank you.

5.3 Noted, thank you.

5.4 Noted, thank you.

5.5 Please note that a Defence Compliance Statement has been prepared and is attached as Appendix G7 to the Draft EAP. Please also note that Denel is registered as an IAAEP on the database and has been notified of the proposed project and possible comments during PPP will be addressed and be included in the Final EAP.

5.6 Zutari confirms that those studies have been undertaken. A separate Biodiversity Offset Report has also been compiled by Scientific Terrestrial Services (STS). Stephen van Stacie and Samantha Leigh Daniels, and is appended as Annexure G 8.7

5.6.1 Zutari notes this requirement should additional studies be identified during the BA process it will be included in the BA process.

5.6.2 All specialists comply with the protocol.

5.6.3 Zutari notes this requirement (Refer Specialist reports)

7. Zutari confirms that no exemption in terms of the Public Participation Process as stipulated by Regulation 41, from any other provisions contained in the EIA Regulations, 2014 (as amended) or the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") has been applied for.

107 of 1588 (HEMA)		amended) or the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA).	
	This Directorate concurs with the EAP's motivation as to why an Ambient Air Quality Impact Assessment will not be required.	7.1 Please note that should you fail to meet a requirement of the EIA Regulations, 2014 (as amended) or the NEMA and if no exemption from that provision was applied for, your application for environmental authorisation may be refused.	7.1 Zutari notes this requirement.
6.3.2	A Geotechnical Assessment will not be conducted since a geotechnical investigation has been undertaken as part of the engineering scope and the Environmental Authorisation issued on 07 July 2017 is still valid. This Directorate concurs with the EAP's motivation as to why a Geotechnical Assessment will not be required.	8. Alternatives: It is advised that in terms of the 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 20 of the EIA Regulations, 2014 (as amended). Alternatives are not limited to activity alternatives, but include layout alternatives, design, activity operational and technology alternatives.	The proposed development entails a refurbishment the existing Macassar WWTW, and as such alternative proposed sites cannot be considered. The only layout is the preferred layout as discussed in this BAR (the subject of the application). A table comparing the initial design details and what has been authorised with what is proposed by the design engineers (with reasons) is included in Appendix N. This alternative (to the current existing design and authorised WWTW) is proposed and has been assessed in the draft BAR.
6.3.3	A Socio-Economic Impact Assessment will not be conducted. The proposed upgrade of the WWTW will improve the livelihoods of people living in areas serviced by the WWTW, which will have a positive impact on the socio-economic environment. The anticipated socio-economic impacts of the proposed development are considered positive in terms of job creation during both the construction and operational phases. As such, a Socio-Economic Impact Assessment is not warranted.	8.1 You are hereby reminded that it is mandatory to investigate and assess the option of not proceeding with the proposed activity (i.e. the "no go" option) in addition to other alternatives identified. Every EIA process must therefore identify and investigate alternatives, with feasible and reasonable alternatives to be comparatively assessed.	8.1 The No-Go option has been assessed by the specialists. The No-Go Option would imply that the Macassar WWTW revert back to the previous and "current" EA. A table comparing the initial design details and what has been authorised with what is proposed by the design engineers is included in Appendix N.1. The no-go option will result in not reaching the need for the proposed upgrade. Without this necessary upgrade, the WWTW will soon reach its capacity.
6.3.4	Civil Aviation Theme: The proposed development is in line with the character of the area and will not pose a risk to any civil aviation activities either as an obstacle or in terms of communications. As such, a Civil Aviation Impact Assessment is therefore not warranted.	8.2 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 option of not proceeding, is required during the assessment. What would, however, be required in this instance is proof that the investigation was undertaken and motivation indicating that no reasonable or feasible alternatives other than the preferred option and the "no-go" option exist.	8.2 The proposed development entails a refurbishment the existing Macassar WWTW. The no-go option and the preferred option is being presented in the draft BAR.
6.3.5	Defence Theme: According to the SSVR, a Defence Impact Assessment or Compliance Statement is not required, since the low sensitivity identified in the Screening Report should be negligible. According to the meeting record of the pre-application meeting held on 11 August 2023, it was advised that due to the proximity of Denel, a Compliance Statement must be done. Considering that the Screening tool report identifies the defence theme as being of low sensitivity, please ensure the SSVR is updated to reflect that although a defence theme was originally deemed as necessary in the pre-application meeting, this is no longer warranted.	9. Public Participation: This Directorate notes that the Public Participation Process will be undertaken in accordance with the requirements of Regulation 41(2) of the EIA Regulations, 2014 (as amended).	9. Zutari confirms that the Public Participation Process will be undertaken in accordance with the requirements of Regulation 41(2) of the EIA Regulations, 2014 (as amended).
6.4	The following studies have been/will be conducted: - An Agricultural Compliance Statement by Johann Lant; - A Terrestrial Biodiversity Impact Assessment by Nick Helme Botanical Survey; - An Aquatic Impact Assessment by BlueScience; and - An Archeological and Heritage Impact Assessment, inclusive of Paleontology by Jayson Orton.	9.1 Consultation with State Departments/Organs of State: In terms of Section 240 of the NEMA the competent authority must consult with every State Department that administers a law relating to a matter affecting the environment when the competent authority considers an application for an environmental authorisation. Regarding the list of State Departments to be consulted, please ensure that this Department's Directorates Waste Management, Pollution and Chemicals Management and Air Quality Management are added to the list of State departments/organs of State to be consulted on pages 19 and 20 of the application form. The contact details are as follows: Directorate: Pollution and Chemicals Management: c/o Ms. Natasha Davis Wolmarans, e-mail: Natasha.Davis.Wolmarans@westerncape.gov.za. All request for comment should be addressed to Ms. Davis-Wolmarans. Directorate: Waste Management: c/o Mr. Saleem Haider, e-mail: Saleem.Haider@westerncape.gov.za. All request for comment should be addressed to Mr. Haider. Directorate: Air Quality Management: c/o Ms. Joy Leamer, e-mail: Joy.Leamer@westerncape.gov.za. All request for comment should be addressed to Ms. Leamer.	9.1 Zutari has ensured that the Department's Directorates Waste Management, Pollution and Chemicals Management and Air Quality Management were added to the list of State departments/organs of State to be consulted during the PPT of the Draft BAR.
6.5	You are further advised that should any of the commenting authorities request any of the specialist studies identified in the Screening Tool and/or additional specialist studies, these will need to be undertaken.	9.2 It is noted that a draft Basic Assessment Report ("BAR") will be circulated to interested and affected parties ("I&APs") and relevant State Departments and all comments will be recorded and addressed in an updated Comments and Responses Report.	9.2 Zutari confirms that all comments will be captured in a comments and response report (CH&R) and will form part of the submission to the DE&ADP with the final BAR submission.
6.6	Where an assessment protocol is prescribed for one of the environmental themes included in the Protocol (in this instance agriculture, animal species, aquatic biodiversity, archaeological and cultural heritage, and terrestrial biodiversity), the specialist assessment must comply with the Protocol.		
	www.westerncape.gov.za Department of Environmental Affairs and Development Planning		
		9.3 You may continue with the Public Participation Process in accordance with the proposal as stipulated in your application form.	9.3 Zutari continued with the Public Participation Process on 16 October -15 November. During this period the revised offset calculations and updated Offset Report constituted substantive changes, and therefore a revised BAR and report have to be circulated to all I&APs. A new advertisement will also be placed, and the hard copy of the BAR will be updated; new notifications will be sent out and the site notices will also be updated with the new PPT date: 30 October to 29 November.
		10 This Department herewith provides the following comments: You are referred to Appendix 1 of the EIA Regulations, 2014 (as amended) for the requirements with respect to the 'Content of basic assessment reports'.	
		10.1 Please be reminded that the Public Participation Process must fulfil the requirements outlined in Chapter 6 of the EIA Regulations, 2014 (as amended), and must consider any applicable guidelines published in terms of Section 241 of the NEMA, this Department's Circular EADP/0028/2014 on the 'One Environmental Management System' and the EIA Regulations, 2014 (as amended), as well as any other guidance provided by this Department.	10.1 The Public Participation Process for the Macassar Upgrade fulfils the requirements outlined in Chapter 6 of the EIA Regulations, 2014 (as amended), and must consider any applicable guidelines published in terms of Section 241 of the NEMA, this Department's Circular EADP/0028/2014 on the 'One Environmental Management System' and the EIA Regulations, 2014 (as amended), as well as any other guidance provided by this Department.
		10.2 Your attention is drawn to Circular 0027 of 2021 regarding the electronic administration of EIA applications. The Directorate (Development Management (Region 1 and 2)) will continue with the electronic submission of correspondence and has for this reason established a dedicated e-mail address for the submission of all correspondence to the Directorates. For the Cape Town office, the e-mail address is: ULAPC1A@ndm@westerncape.gov.za .	10.2 Zutari has been submitting and will submit all future correspondence to the dedicated email address.
		10.3 E-mail notification to I&APs is strongly supported. However, other means of notification for those I&APs will be required where no e-mail addresses are available, or where the likelihood of success of this electronic correspondence is expected to be low.	10.3 Zutari makes use of email notifications as well as letter to those I&APs who does not have email addresses.
		10.4 The Directorate may require that a hard copy of the reports also be submitted to the Department but will advise you accordingly.	10.4 Zutari notes this requirement and will provide hard copies where needed. A hard copy of the updated I&AR and Biodiversity Report is

			6.7 Where a specialist assessment is required, but no specific environmental theme protocol has been prescribed and/or specialist assessments have been initiated prior to 09 July 2020, the level of assessment must be based on the findings of the site verification and must comply with Appendix 6 of the EIA Regulations, 2014 (as amended). 7. <u>Exemptions:</u> 7.1 The Department notes that you do not intend to apply for exemption from any of the requirements of the Public Participation Process as stipulated by Regulation 41, from any other provisions contained in the EIA Regulations, 2014 (as amended) or the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NE/IA"). 7.2 Please note that should you fail to meet a requirement of the EIA Regulations, 2014 (as amended) or the NE/IA and if no exemption from that provision was applied for, your application for environmental authorisation may be refused. 8. <u>Alternatives:</u> 8.1 Be advised that in terms of the EIA Regulations, 2014 (as amended) and the NE/IA 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 20 of the EIA Regulations, 2014 (as amended). Alternatives are not limited to activity alternatives, but include layout alternatives, design, activity, operational and technology alternatives. 8.2 You are hereby reminded that it is mandatory to investigate and assess the option of not proceeding with the proposed activity (i.e., the "no-go" option) in addition to other alternatives identified. Every EIA process must therefore identify and investigate alternatives, with feasible and reasonable alternatives to be comparatively assessed. 8.3 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 option of not proceeding, is required during the assessment. What would, however, be required in this instance is proof that the investigation was undertaken and motivation indicating that no reasonable or feasible alternatives other than the preferred option and the "no-go" option exist. 9. <u>Public Participation:</u> 9.1 This Directorate notes that the Public Participation Process will be undertaken in accordance with the requirements of Regulation 41(2) of the EIA Regulations, 2014 (as amended). 9.2 <u>Consultation with State Departments/Organs of State:</u> In terms of Section 240 of the NE/IA the competent authority must consult with every State Department that administers a law relating to a matter affecting the environment when the competent authority considers an application for an environmental authorisation. 9.2.1 Regarding the list of State Departments to be consulted: please ensure that this Department's Directorates Waste Management, Pollution and Chemicals Management and Air Quality Management are added to the list of State	Where I&APs are unable to access electronic copies of the I&AR, a hard copy of the I&AR must be made available. Alternatively, the EAP will be required to engage with I&APs, with respect to alternative methods of accessing electronic copies of the I&AR. 10.5 In terms of good environmental practice, you are encouraged to engage with State Departments and other Organs of State early in the EIA process to solicit their input on any of their requirements to be addressed in the I&A process. Please note that this does not replace the requirement of making the I&AR available to State Departments as stipulated above. 11. <u>Environmental Management Programme ("EMP"):</u> In accordance with Section 24N of NEMA and Regulation 19 the Department hereby requires the submission of an EMP. The contents of such an EMP must meet the requirements outlined in Section 24N of the NEMA (as amended) and Appendix 4 of the EIA Regulations, 2014 (as amended). 11.1 The EMP must address the potential environmental impacts of the activity throughout the project life cycle including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing). The EMP must be submitted together with the I&AR. 11.2 The Department would like to advise that in compiling the EMP the Department's Guideline for Environmental Management Plans (June 2005), available on the Department's website must be considered. 11.3 In terms of the EIA Regulations, 2014 (as amended), when considering an application, the Department must consider 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 I&AR. The I&AR must reflect how the strategic context of the site in relation to the broader surrounding area, has been considered in addressing need and desirability. 11.4 In addition to the above, 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. 12. <u>Social and Gender Considerations:</u> You are reminded that the social context of the proposed development must always be considered. This includes the impact that the development proposal may have on the prevalence of HIV/AIDS, sexually transmitted infections and Tuberculosis, as well as equity and gender related concerns. 13. <u>Climate Change:</u> The I&AR must report on the potential impacts on climate change. 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 that could be implemented for the proposed development. 14. In accordance with Regulation 19(1) of the EIA Regulations, 2014 (as amended), the final I&AR must be submitted within 90 days of receipt of the application by the Department, (i.e. calculated from 11 September 2020). If, however, significant changes have been made or significant new information has been added to the I&AR, the applicant/EAP must notify the Department that an additional 50 days (i.e., 140 days from receipt of the application) would be required for the submission of the I&AR. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information. Further note, in terms of Regulation 45 of the EIA Regulations, 2014 (as amended), an application in terms of the EIA Regulations, 2014 (as amended) lapses and the competent authority will deem the application as having lapsed, if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless extension has been granted in terms of Regulation 3(7). 15. Kindly quote the abovementioned reference number in any future correspondence in respect of the application. 16. It is prohibited in terms of Section 24F of the NEMA for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of the activity. A person convicted of an offence in terms of the above is liable for a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment. 17. The Directorate reserves the right to revise or withdraw comments or request further information based on any information received.	available in the library. I&APs can also ask that the information is placed on a USB. Zutari takes note of the good environmental practice and has circulated the I&AR to departments and have engaged with various departments. The Macassar EMP (Appendix H) meet the requirements outlined in Section 24N of the NEMA (as amended) and Appendix 4 of the EIA Regulations, 2014 (as amended). The EMP fulfils the criteria. The Department's Guideline for Environmental Management Plans (June 2005) has been considered Please refer to Appendix K.1 and Section E of the draft I&AR. Please refer to Appendix N.1. The upgrade will remove capacity limitations on the existing process, reduce energy demand, optimise operation and maintenance and prevent further pollution of the Eerste River. Please refer to Appendix K number 12. Please refer to Appendix O. Zutari takes note of the legislated timeframes. Zutari takes note and will use the reference number in all correspondence Zutari and the client (COT) takes note. Zutari and the client (COT) takes note.
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departments/organs of State to be consulted on pages 19 and 20 of the application form. The contact details are as follows:

Directorate: Pollution and Chemicals / Management:
c/o /i/s. Natasha Davis-Wolmarans, e-mail: Natasha.Davis-Wolmarans@westerncape.gov.za. All request for comment should be addressed to /i/s. Davis-Wolmarans.

Directorate: Waste / Management:
c/o /i/r. Saleem Haider, e-mail: Saleem.Haider@westerncape.gov.za. All request for comment should be addressed to /i/r. Haider.

Directorate: Air Quality / Management:
c/o /i/s. Joy Leaner, email: Joy.Leaner@westerncape.gov.za. All request for comment should be addressed to /i/s. Leaner.

- 9.3 It is noted that a draft Basic Assessment Report ("BAR") will be circulated to interested and affected parties ("I&APs") and relevant State Departments and all comments will be recorded and addressed in an updated Comments and Responses Report.
- 9.4 You may continue with the Public Participation Process in accordance with the proposal as stipulated in your application form.
- 9.5 This Department herewith provides the following comments:
- 9.5.1 You are referred to Appendix 1 of the EIA Regulations, 2014 (as amended) for the requirements with respect to the 'Content of basic assessment reports'.
- 9.5.2 Please be reminded that the Public Participation Process must fulfil the requirements outlined in Chapter 6 of the EIA Regulations, 2014 (as amended), and must consider any applicable guidelines published in terms of Section 24J of the NEIA, this Department's Circular EADP/0028/2014 on the "One Environmental Management System" and the EIA Regulations, 2014 (as amended), as well as any other guidance provided by this Department.
- 9.5.3 Your attention is drawn to Circular 0027 of 2021 regarding the electronic administration of EIA applications. The Directorate: Development / Management (Region 1 and 2) will continue with the electronic submission of correspondence and has for this reason established a dedicated e-mail address for the submission of all correspondence to the Directorates. For the Cape Town office, the e-mail address is DEADPEIAAdmin@westerncape.gov.za.
- 9.6 E-mail notification to I&APs is strongly supported. However, other means of notification for those I&APs will be required where no e-mail addresses are available, or where the likelihood of success of this electronic correspondence is expected to be low.
- 9.7 The Directorate may require that a hard copy of the reports also be submitted to the Department but will advise you accordingly. Where I&APs are unable to access electronic copies of the BAR, a hard copy of the BAR must be made available.



Alternatively, the EAP will be required to engage with I&APs, with respect to alternative methods of accessing electronic copies of the BAR.

- 9.8 In terms of good environmental practice, you are encouraged to engage with State Departments and other Organs of State early in the EIA process 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 BAR available to State Departments as stipulated above.
10. Environmental / Management Programme ("Ei/Pr"):
- 10.1 In accordance with Section 24N of NE/IA and Regulation 19 the Department hereby requires the submission of an Ei/Pr. The contents of such an Ei/Pr must meet the requirements outlined in Section 24N of the NE/IA (as amended) and Appendix 4 of the EIA Regulations, 2014 (as amended).
- 10.2 The Ei/Pr must address the potential environmental impacts of the activity throughout the project life cycle including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing). The Ei/Pr must be submitted together with the BAR.
- 10.3 The Department would like to advise that in compiling the Ei/Pr the Department's Guideline for Environmental / Management Plans (June 2005), available on the Department's website must be considered.
11. In terms of the EIA Regulations, 2014 (as amended), when considering an application, the Department must consider 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 BAR. The BAR must reflect how the strategic context of the site in relation to the broader surrounding area, has been considered in addressing need and desirability.
12. In addition to the above, you must clearly show how the proposed development complies with the principles contained in Section 2 of the NE/IA and must also show how the proposed development meets the requirements of sustainable development.
13. Social and Gender Considerations:
You are reminded that the social context of the proposed development must always be considered. This includes the impact that the development proposal may have on the prevalence of HIV/AIDS, sexually transmitted infections and Tuberculosis, as well as equity and gender related concerns.
14. Climate Change:
The BAR must report on the potential impacts on climate change.
- 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 that could be implemented for the proposed development.



			15. In accordance with Regulation 19(1) of the EIA Regulations, 2014 (as amended), the final BAR must be submitted within 90 days of receipt of the application by the Department, (i.e., calculated from 11 September 2024). If, however, significant changes have been made or significant new information has been added to the BAR, the applicant/EAP must notify the Department that an additional 50 days (i.e., 140 days from receipt of the application) would be required for the submission of the BAR. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information. Further note, in terms of Regulation 45 of the EIA Regulations, 2014 (as amended), an application in terms of the EIA Regulations, 2014 (as amended) lapses and the competent authority will deem the application as having lapsed, if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless extension has been granted in terms of Regulation 3(7). 16. Kindly quote the abovementioned reference number in any future correspondence in respect of the application. 17. It is prohibited in terms of Section 24F of the NEIA for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of the activity. A person convicted of an offence in terms of the above is liable for a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment. The Directorate reserves the right to revise or withdraw comments or request further information based on any information received. Yours faithfully Taryn Dreyer Digitally signed by Taryn Dreyer Date: 2024.09.19 13:15:14 +02'00' pp MR. ZAAHIR TOEFF DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1) CC: (1) Ms. Corlie Steyn (Zutari (Pty) Ltd.) (2) Ms. Azanne van Wyk (City of Cape Town) E-mail: Corlie.Steyn@Zutari.com E-mail: azanne.vanwyk@capetown.gov.za  www.wedemcap.gov.za Department of Environmental Affairs and Development Planning	
8.1_2	Lauren King	City of Cape Town Snr Professional Officer: Environmental & Heritage Management – Eastern Region	15/10/2024 Good day Marianna, This email serves to acknowledge receipt of the public participation process. This office will circulate the application internally and provide you with a consolidated comment from the City of Cape Town on the above application. Please provide me with a WeTransfer link to the documents, as it takes too much time to download the documents one by one for internal circulation. Thank you. Regards Lauren King 16/10/2024 Dear Corlie, Thank you for your response. I managed to download the documents from the link provided. Thank you. Regards Lauren King	16/10/2024 Dear Lauren, Unfortunately, Zutari cannot use WeTransfer due to security reasons. Please see a link below to our server below.  CCT Please let us know whether you can access, otherwise we will make another plan. There is also a separate folder (in this link) with high quality maps that might take time to download but the pdfs in the current folder are all minimized so that should download faster. Kind regards Corlie Steyn 16/10/2024 Dear Lauren, Thank you for letting us know and please do not hesitate to ask if anything is unclear. Kind regards Corlie Steyn

8.1_3	Meroline Ockhuis	City of Cape Town Regional Air Quality Practitioner	16/10/2024 Good morning, All Your email is acknowledged as received. Kindly note w.r.t. changes in our organization, Fundiswa Sandi, included in this response, is the new contact person at AQM for the Macassar area. Please exclude me in further communications, and include [REDACTED] [REDACTED] FYI. Kind Regards Meroline Ockhuis	16/10/2024 Good Morning Meroline Thank you for your email. Changes will be made accordingly. Kind Regards Marianna Taljaard
8.1_4	Lindiwe Victoria Dlamini	DFFE Directorate: Biodiversity Conservation	16/10/2024 Dear Sir/Madam DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Mrs P Makitla and Ms Nompumelelo Lekalakala (Copied on this email). In addition, kindly share the shapefiles of the development footprints/application site with the Case Officers. Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@dffe.gov.za for attention of Mr Seoka Lekota Kind Regards Lindiwe Victoria Dlamini	16/10/2024 Good Day Thank for your email. Herewith attached as requested.  Macassar WWTW_Indicative Eskom Supply Cable Route.kmz 2 MB Kind Regards Marianna Taljaard
8.1_5	Fundiswa Sandi	City of Cape Town Regional Air Quality Practitioner	16/10/2024 Good day Marianna This is to acknowledge the receipt of your email, and the content is noted thereof. We will liaise with our internal Environmental Management Department for City's comments consolidation. @Bronwyn, please add to EIA Database for Rabelani's review and comments. @Rabs, kindly check with the Macassar Environmental & Heritage Management Branch for records. Thank you and kind regards Fundiswa Sandi	17/10/2024 Good Morning Fundiswa Thank you for acknowledging receipt. Kind Regards Marianna Taljaard
8.1_6.1	Dr Cedric Hendricks		17/10/2024 Application to have an opportunity to participate DEA&DP REF.Number:16/3/3/1/A3/2054/24 Request for Available information. The Draft Basic Assessment Report (BAR) NEMA,Act (NEMA,Act No.107 of 1998) Could you please forward all documentation as you said qas submitted.ie.Legal Framework. Times of previous submissions and dates Submissions, Please can you also please submit documents where the applications were submitted to the EA, (EIA) (DEA&AP) Time frames for public comments are unfair and too little as the previous processes have not been transparent and fair toward the historical local Indigeonous Aboriginal Peoples of the land and local communities. You are operating from and with a budget, but no budget created for the inclusion of the local Indigeonous leaders and other Macassar Citizens! This is the weakness and disrespect of CoCT and local government.Developers has once again shown great disrespect for our Macassar Ward 109 Indigeonous KhoiSan communities!	17/10/2024 Dear Dr Hendricks, Thank you for taking my call. Please see below the link to the main report (Basic Assessment Report) and all annexures (inclusive of maps) pertaining to the upgrade of the Macassar Wastewater Treatment Works. In this report you will find a description of what exactly the upgrade will entail. https://www.zutari.com/macassar-wwtw-public-participation/ The hard copy is also available at the Macassar library. Please do not hesitate to reach out should you have any other queries or concerns. Kind regards Corlie Steyn

			Dr.Cedric Hendricks: Environmental Affairs	
			17/10/2024 Thank you I have received it.	
			18/10/2024 I've received the stick with manual on it from the library!	18/10/2024 Dear Dr Hendrick, We are glad you received the information. Please do not hesitate to reach out should you have any other queries or concerns. Kind regards Corlie Steyn
			29/10/2024 Name DR.CEDRIC W HENDRICKS Organization THE MACASSAR ENVIRONMENTAL SOCIETY,NATURE CONSERVATION AND COASTAL FORUM Role CHAIRPERSON Address Phone Number Email CommentsOrQuestions COMMENTING PERIOD FOR THE COMMUNITY . There has no been a proper community public participation process which the CoCT SAYS COST 50 BILLION RANDS. So no public participation meetings. Ahall could be booked and overhead projector to explain more broadly about the project and process! This form submitted at: https://www.zufari.com/macassar-wwtw-public-participation/ © Zufari	11/11/2024 Dear Dr Hendricks, We have reached out via your cell number to see if you will be available for a public meeting on 22 November pertaining to the Macassar WWTW. Please let is know if there is perhaps an alternative number where we can reach you. Kind regards Corlie Steyn
			12/11/2024 My Whatsapp nr. Is: xxx xxx xxxx	13/11/2024 Dear Dr Hendricks, Thank you for your WhatsApp number. We will be in contact soon in reference with the details for the public meeting. Kind regards Corlie Steyn
			30/10/2024	30/10/2024

			The map which is shown here is lacking in details as it is very limited in what it shows of Ward 109 Macassar which it does and does not show! the photographic material is extremely weak and leaves the reader wondering and confused!	Dear Dr Hendricks, The map you refer to (A.3.2) must only show the start middle and end co-ordinates of the linear activity - this is portrayed in said map. Attached are all the maps as requested in the official template of the Basic Assessment Report for ease of reference. Appendix B1.3_Property Boundaries.pdf 777 KB Appendix B1.5_Environmental_Sensitivities_site_plan_v3.pdf 1 MB Appendix B1.7_Contours.pdf 1 MB Appendix B2.1a_Biodiversity Map_1_25000_v8.pdf 1 MB Appendix B2.1c_32m Biodiversity and Freshwater Buffer map_v3.pdf 2 MB Appendix B2.3_Heritage and Palaeo Sensitivity Map.pdf 3 MB Appendix A1.1_Locality Map_v3.pdf 1 MB Appendix A3.0_Map with GPS.pdf 29 KB Appendix A3.2_100m.pdf 1 MB Appendix B1.4_Roads_and_Sensitivities.pdf 1 MB Appendix B1.6_Floodlines.pdf 1 MB Appendix B2.0 Sensitivity maps.pdf 49 KB Appendix B2.1b_Biodiversity sensitivity_1_7000.pdf 4 MB Appendix B2.2_Freshwater sensitivity_1_12000.pdf 4 MB Appendix A1.0_Locality map.pdf 27 KB Appendix A2.0_Coastal zones.pdf 30 KB Appendix A3.1_GPS_coordinates_v2.pdf 1 MB Appendix B1.0 site plan.pdf 28 KB Maps and site plans have been compiled in conjunction with the criteria as determined by the Department. Please refer to Page 13 and 14 of the Report (snippet below for ease of reference) of what must be on each map and plan. MAPS Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property. Locality map: The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g. 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s); • a north arrow; • a legend; and • a linear scale. For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken. Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the report. Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations. Site Plan: Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following: • the detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale; • the property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan; • On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided; • the current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan; • The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan; • Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development must be clearly indicated on the site plan; • Sensitivities and an indication of the purpose of each servitude must be indicated on the site plan; • Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): ◦ Watercourses / Rivers / Wetlands ◦ Road lines (i.e., 1:100 year, 1:50 year and 1:10 year where applicable); ◦ Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"); ◦ Villages; ◦ Cultural and historical footprints/landscapes; ◦ Areas with indigenous vegetation (even if degraded or infested with alien species); • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted; • North arrow A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.
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Thank you for taking g the time to read!
Dr.Cedric Hendricks; Environmental Affairs

ZUTARI
IMPACT. ENGINEERED.

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10 December 2024

Dr Hendricks
59 Clifton St
Macassar
Cape Town
7134
Email: cedrichendricks505@gmail.com

Dear Dr Hendricks,

Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment

Your email dated 28 November 2024 has reference.

Thank you for making the time to raise comments during the public participation process for the upgrade of the Macassar Wastewater Treatment works (WWTW).

Thank you for attending the public participation meeting on 22 November 2024 at the Old Macassar Community Hall. It is noted that the community in Ward 109 Macassar raised their opinions in reference to various matters.

Please refer below to extracts from correspondence received and answers to the questions and comments raised as provided by the Project team. Please note for the purposes of this correspondence efforts has been made by Zutari to correct and amend typographical and language errors observed in the written correspondence submitted to Zutari, these are indicated in bold square brackets [].

Paragraph 1: Extract

"I'm not sure whether you've talked their comments as yet, however this WWTP proposed project of which most only heard about for the first time! We tried to engage with our Counselor [Councillor] to ascertain if he knew anything about it but he never pitched for the meeting!"

Paragraph 1: Answer

Please note that the meeting was advertised in the local newspaper as requested by yourself. All I&APs were informed of the meeting via email as well. Proof of the said actions will be included in the Final Comments and Response Report (CRR), and which will be shared with all Interested and Affected Parties (I&APs).

Paragraph 2: Extract

*"The issues put forth in the Draft Basic Assessment Report is such a large document mentioning various facets of the proposed project!
The questions the floor put to your panel was not sufficiently answered and the process was rushed as a process which took Zutari 8 plus years to put together only became known recently! The advertising process just for the public participation meeting was heavily flawed as it is a 95% Afrikaans speaking community. Only two Xhosa speaking community members pitched up."*

Zutari (Pty) Ltd | Reg No 1977/00271107 | Board of Directors (DTJ2024) *NN Gungwe (Chairperson), T Diale, *AC Dlodola, *PJ Hendricks,
TBo Mhango, *NKA Mbowe, J Ndlovu, *GT Rorobela (*Non-Executive Director)



				ZUTARI <u>Paragraph 2: Answer</u> Please note that Zutari commenced with this project in November 2021 and Zutari's involvement on the project is limited to the last 3 years (i.e., November 2021 to date). The content of the Draft Basic Assessment Report follows a legislated template that needs to fulfil the criteria of the Environmental Authorisation process as defined by the National Environmental Management Act (NEMA Act 107 of 1998). The competent Authority is the Provincial Department of Environmental Management and Development Planning (DEA&DP) and the Basic Assessment Report template is the prescribed template to be used as downloaded from the DEA&DP website (April 2024 version is the latest and most up to date version). Although it could seem repetitive at times and that extra duplication is done unnecessarily, it is important to ensure that all aspects of the project are adequately considered in terms of the environmental process. Furthermore, please note that public engagement pertaining to the Environmental Authorisation process can only take place once the application form has been submitted to the competent authority (as per the explanation of the environmental process provided at the public meeting). In reference to the Macassar WWTW, the application form was submitted on 11 September 2024. As explained during the public meeting on 22 November 2024, the language of the competent authority is English, and therefore the reports and annexures are provided in English. During the public meeting, English was used as the preferred language of engagement. Based on the interaction of the attendees with the presenters and the information it became evident that English was well understood and provided a good standard language to engage in. <u>Paragraph 3: Extract</u> <i>"The premise that the project would hold socio-economic benefits for our community is mostly a fallacy as most big projects of this proposed magnitude never really benefitted the local community! The Community Leaders said that this meeting must not be construed as a Public Participation Meeting as their [they] was [were] never consulted with them at a round table and if this meeting be used as a public participation meeting then they will not accept the upgrading or expansion of this wwtp [WWTP]"</i> <u>Paragraph 3: Answer</u> The opinion expressed regarding the socio- economic benefits and meeting is noted. The proposed project will hold a socio-economic benefit to the community and the greater area at large as it will improve the quality of treated effluent being released into the Eerste River and the new WWTW will be able to handle the volume of effluent it is currently receiving. This will result in an area wide positive impact as protecting the environment is beneficial to all people. Furthermore, the project will result in job creation for local communities (directly and indirectly) which will improve both social and economic conditions. The South African legislation and guidelines have formalised the Public Participation Process (PPP) for the Basic Assessment Process. The PPP for the Macassar WWTW was undertaken in accordance with regulations 39 – 44 of the EIA Regulations and therefore complies with the legislative requirement. Additional guidance has been incorporated from the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP) Guideline document on Public Participation (March 2013). <u>Paragraph 4: Extract</u> <i>"We all know that the Strand, Somerset West and Ward 109 has grown exponentially in just a few years while we in our local none-white communities have struggled to find land for development of decent affordable housing! That been [being] said we know about all the gated security estates planned and still to come. Besides there was no mention made of Sitar, Croydon, Huntsman, and other gated estates which already lies in Ward 109! Gaps of information and knowledge are missing in the DBAR! There also exist a lot of repetition of the same Information within the DBAR! I will submit my written</i> Project number 1001780, Letter to Dr Hendriks, Final.docx, 2024/12/12, Rev 0 2 
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				ZUTARI submission after I come from SARs as this past three weeks jfh]as been hectic and I had to contend with health issues too." Paragraph 4: Answer Please refer to the answer to paragraph 2 in reference to the content of the DBAR. Furthermore, Zutari is appointed as an independent consultancy to undertake the Environmental Process related to the upgrade of the Macassar Wastewater Treatment Works, and Zutari does not have the mandate to comment on the housing and related concerns. It is recommended that these concerns are directed through appropriate channels to the relevant Municipal or Local Government departments. The process currently being undertaken is to specifically seek environmental authorisation. Kind regards  Corlie Steyn Senior Environmental Practitioner Project number 1001780, Letter to Dr Hendriks, Final.docx, 2024/12/12, Rev 0 
8.1_7	Ismat Adams	Cape Nature Land-Use Scientist Landscape West	25/10/2024 Good day Please register me as I&AP. Name: Ismat Adams Organisation: CapeNature Capacity: Land-Use Scientist – Landscape West Please send on Google Earth KML files or QGIS shapefiles of the activity footprint. Ismat Adams Land-Use Scientist Landscape West Conservation Operations t: [REDACTED]	28/10/2024 Dear Ismat, Thank you for your contact details. We have registered you as an I&AP. Please find attached the following: 1) KMZ (Footprint of infrastructure and cable).  Furthermore: Please note that new information to the draft Basic Assessment Report which has been included as: (refer attached documentation for ease of reference). (You will also receive a new email and notification re this tomorrow) 1. Appendix G 8.2: Technical Memorandum: High-level alternative analysis for the proposed Biodiversity Offset Initiative for the Macassar Wastewater Treatment Works expansion project, Macassar, Western Cape 2. The draft Basic Assessment Report has been updated accordingly on the following pages, namely: Cover page, 17 and 76-82. For ease of reference the updated sections text is orange in colour, bold and underlined. 3. The EMPr has been updated with additional changes, please refer to page 40 and 41. For ease of reference the updated sections text is orange in colour, bold and underlined. Please take note that the Public Participation Process has been extended for another 30 days namely from: 29 October 2024 until 29 November 2024

				Should you have any other queries please do not hesitate to reach out to us. Kind regards Corlie Steyn
				20/11/2024 Dear Ismat, I hope you are doing well. We urgently need comment from Cape Nature in reference to the importance of the project and very limited timeframes. Can you please let us know how we can assist to obtain comments from Cape Nature. Kind regards Corlie Steyn
				20/11/2024 Dear Ismat, Please see attached the latest BAR and the latest Offset Memo that formed part of the second round of PPP. Kind Regards Corlie Steyn  Basic_Assessment_Report July 2024_Macassar WWTW_Final Dr... 5 MB  Appendix G.8.2_Macassar WWTW Biodiversity Offset Memo 2... 8 MB
			21/11/2024 Good day See attached comment. Kind Regards Ismat Adams Land-Use Scientist Landscape West Conservation Operations	21/11/2024 Dear Ismat, Thank you for the comments from CapeNature. We will revert as soon as possible. Kind regards Corlie Steyn



CONSERVATION OPERATIONS: LANDSCAPE WEST

Postal PO Box 26, Porterville, 6810
Physical 72 Voortrekker Street, Porterville, 6810
Website www.capenature.co.za
Enquiries Iona Adams
Telephone 0870673188
Email adams@capenature.co.za
Reference SSD142/14/14/3_Erf 1285_Macassar
Date 21 November 2024

Zutari (Pty) Ltd

Via email: Corlie.Steyn@Zutari.com

Attention: Corlie Steyn

Dear Corlie

RE: Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment

DEA&DP Ref: 16/3/31/A3/39/2054/24

Herewith CapeNature's comment on this application.

- I. Based on the terrestrial biodiversity report, freshwater assessment and biodiversity offset report (25/10/2024) the following is understood:
 - I.1 According to the terrestrial biodiversity specialist the site contains intact Cape Flats Dune Strandveld, and degraded Cape Flats Dune Strandveld of high and medium botanical sensitivity respectively that are also mapped CBA1b according to BioNET. One regionally significant sub-population of botanical SCC was present on site and another not regionally significant sub-population of another botanical SCC. One faunal chameleon SCC is likely to occur on site, and it is noted that there is no adequate host plant for the *Kedestes barberae bunta* or *Kedestes lenis lenis* on site considering that the dune stacks for *Imperato cylindrica* have been transformed and used for sludge ponds. About 6.8ha of High sensitivity habitat will be lost to the proposed development, along with about 2.1ha of Medium sensitivity habitat, and the rest (about 13.5ha) will be of Low sensitivity. An underground electrical cable connection is also part of the development and will also encroach high and medium sensitivity habitat. The electrical cable will be installed by means of trenching. The specialist assessed a high negative residual impact on terrestrial biodiversity and a medium negative cumulative residual impact. The impact of installation of the underground cable was low negative residual impact considering that impacts could be mitigated. The specialist also highlighted that the proposed development will result in narrowing of an ecological coastal corridor between Macassar NR to the west, and the Paardevlei dunes to the east. The specialist also highlights that based on impact the no-go development option is preferred, and that the expansion should only be considered if there are no site alternatives.
 - I.2 As per the freshwater specialist, aquatic features that are likely to be impacted by the proposed upgrade to the Macassar WWTW are the lower Eerste River and Estuary and some largely artificial wetland areas associated with past activities at the WWTW. The lower river and estuary are considered to be in a severely modified ecological state as a result of flow modification and water quality impacts arising from the discharge of treated wastewater from several WWTWs in the Kulls and Eerste River Catchment as well as storm water runoff. The lower Eerste River is considered to be of moderate Ecological Importance and Sensitivity due to the indigenous fish that occur within the river system and the link of the lower river with the estuary and marine protected area. The lower river and estuary have also been mapped

as a FEPA wetland/estuary. The wetland areas likely to be impacted by the proposed activities are considered to be in a largely to severely modified ecological condition. The existing discharge of treated wastewater from the Macassar WWTW has already considerably altered the estuary; thus the potential impact of an upgrade to this WWTW is likely to be less significant. The proposed upgrade to the existing WWTW will result in an improvement in the final treated wastewater quality, and as such, one could expect that the proposed upgrade would at least improve the existing water quality situation in the Eerste River Estuary. The freshwater specialist has also highlighted that flow modification to the estuary in terms of the increased amount of discharge from the WWTW will likely be the ecological flow requirement for the estuary be determined at a rapid or intermediate level and be considered in terms of the future volumes and water quality to be discharged to the estuary, along with other mitigation measures such as increased use of WWTW discharge for other uses. It is also noted that wetland rehabilitation will be conducted on the lower Eerste river within the site property, that will also result in improvement of wetland function and water quality running to the estuary.

1.3 The offset approach to the proposed development has identified potential offset receiving areas in consultation with the City of Cape Town Biodiversity Management branch, and has analysed the suitability of candidate offset receiving areas based on offset principles as per the National Biodiversity Offset Guideline (NBOG). Ultimately option 1, 7 and 8 have met the criteria of ecological equivalence, alignment with conservation planning, long-term and legal viability, and rehabilitation potential.

The offsetting ratio was calculated as per the NBOG, with basic offset ratio of 10:1 for endangered Cape Flats Dune Strandveld (CFDS), adjusted by a factor of 2 for high sensitivity areas (considering habitat condition) and 1.5 for medium sensitivity areas, resulting in the need for an offset receiving area of 176ha. The proposed suitable offset receiving areas will meet the hectare requirements. Option 1 is adjacent to the current development site, option 7 is part of the coastal ecological corridor to the east of the WWTW near Paardevel, and option 8 is the City's proposed offsetting land bank that consists mostly of endangered Swartland Granite Renosterveld. It is noted that the amount of CFDS in offset areas 1 and 7 still need to be determined but is mapped as containing CFDS. It is also noted that should it be the case that certain sections of option 7 are not available for offsetting due to unforeseen circumstances that the required hectareage could be obtained from option 8 (to which the City has agreed).

2. It is understood and noted that this development entails the refurbishment and upgrading of the Macassar WWTW to handle increased capacity from the local communities, without which severe environmental degradation from sewage pollution could occur to the Eerste river, estuary, MPA and surrounding habitat. It is recommended that the proponent indicate whether site alternatives practicable, as it is agreed as per the terrestrial biodiversity assessment that the no-go alternative should be considered as part of the mitigation hierarchy. Should the proponent indicate that site alternatives are not practicable, then the high negative residual impact needs to be addressed via offset as per the updated offset report provided.

3. The offset report has adequately implemented the NBOG and is supported, including the analysis of suitable offset receiving areas. Based on the analysis it is agreed that option 1, 7 and 8 are the only viable options that also meet offsetting guidelines.

It is understood that the proposed offset is a combination of meeting ecological equivalence and trading up (on the basis that an ecosystem with a much smaller remaining extent will be conserved), and that the ratio of CFDS to granite renosterveld is such that granite renosterveld will be higher based on hectareage requirements of the offset, and limitation of CFDS available for offsetting. This approach is accepted as it is the only viable approach considering the limitation on available and practicable offset receiving areas.

			It is noted and accepted as per the offset report and City BMB letter that the City BMB will be the implementing agent and that site option 1 will be included in the Macassar East Nature Reserve. CapeNature also fully supports the inclusion of site option 7 to further safeguard the coastal ecological corridor. 4. Translocation of SCC from the development site into offset receiving area option 1 should be conducted should this be deemed feasible by the offset implementing agent, based on suitability of translocation environment and competition considerations. CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received. Kind regards, Digitally signed by Ismat Adams Date: 2024.11.21 15:25:13 +02'00' Ismat Adams Land-Use Scientist: Landscape West Conservation Operations	
			Page 3 of 3	29/11/2024 Dear Mr Adams, Please see attached the correspondence from the project team pertaining to your letter dated 21 November 2024. Please do not hesitate should you have any additional questions. Kind regards Corlie Steyn

29 November 2024

Mr Ismat Adams
CapeNature: Conservation Operations: Landscape West
PO Box 26
Porterville
6810
Email: iadams@capenature.co.za

Dear Mr Adams
Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment

Your email and letter dated 21 November has reference.
Thank you for making the time to raise comments during the public participation process for the extension and refurbishment of the Macassar Wastewater Treatment Works (WWTW) on behalf of CapeNature.

1. Zutari confirms and concur the background and content as understood by CapeNature as stipulated in Paragraphs 1 (1.1 – 1.3).
2. Paragraph 2 in your letter makes a recommendation in reference to alternative sites and the consideration of the No-Go option. Please note the following in this regard:
The proposed development entails an extension and refurbishment of the existing Macassar WWTW, and the City of Cape Town already has bulk infrastructure in place (i.e., bulk sewers and bulk pump stations) which collects, conveys and discharges sewage from the catchments being served by the Macassar WWTW, and as such alternative sites for the proposed developments are not practicable and feasible.

The preferred layout is discussed in the draft BAR (the subject of the application). A table comparing the initial design details and what has been authorised compared to what is proposed by the design engineers (with reasons) is included in Appendix N.1 This alternative (to the current existing design and authorised WWTW) is proposed and has been assessed in the draft BAR. The No-Go option has been assessed by the specialists. The No-Go Option would imply that the Macassar WWTW revert to the previous and "current" EA. The No-Go option will result in the City not being able to achieve treatment objectives in terms of treated effluent into the Eerste River, dealing with odours generated from the WWTW and the suitable management of biosolids. The proposed development as presented in the draft BAR will allow the City to meet these treatment objectives. Due to rapid urbanisation and a sustained population growth in the False Bay region, a shortfall in treatment capacity is experienced at the WWTW. The WWTW is in dire need of an upgrade due to aging and dilapidated infrastructure as well as capacity constraints. The high residual impact of the proposed project will therefore be addressed via the offset proposal.



				ZUTARI 3. Zutari notes that Paragraph 3 stipulates that the proposed Biodiversity offset approach is accepted and that the City BMB will be the implementing agent and that CapeNature supports the inclusion of site option 7 to further safeguard the coastal ecological corridor. 4. Paragraph 4 proposed the translocation of SSC by the implementing agent. This mitigation measure will be captured in the Final EMP. Kind regards  Corlie Steyn Senior Environmental Practitioner Project number 1001780, Letter to CapeNature.docx, 20241109, Rev 0 
			29/11/2024 Good day See attached response. Kind regards, Ismat Adams Land-Use Scientist Landscape West Conservation Operations	

			 CONSERVATION OPERATIONS: LANDSCAPE WEST Postal: PO Box 26, Porterville, 6810 Physical: 72 Voornkarak Street, Porterville, 6810 Website: www.capenature.co.za Enquiries: Ismat Adams Telephone: 0870873188 Email: ismat@capenature.co.za Reference: SSD14/2/6/14/5_Erf 1285_Macassar Date: 29 November 2024 Zutari (Pty) Ltd Via email: Corlie.Steyn@Zutari.com Attention: Corlie Steyn Dear Corlie RE: Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment – Comments Response DEA&DP Ref: 16/3/3/11A3/39/2054/24 Your letter dated 29 November 2024 refers, herewith further comments considering your responses. I. The biodiversity offset proposal is supported as per previous comments, considering that site alternatives are not practicable or feasible, and that the upgrade requirements should mitigate longer term environmental degradation. CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received. Kind regards, Ismat Adams Digitally signed by Ismat Adams Date: 2024.11.29 10:13:26 +02'00' Land-Use Scientist: Landscape West Conservation Operations Page 1 of 1	
8.1_8	David Whitelaw	CBC Conservation Committee	27/10/2024 Dear Corli, As chairman of the Cape Bird Club Conservation committee and as Macassar, despite being a Wastewater Treatment Works, is home to a wide variety of birds, could you please register me as an Interested and Affected Party, Regards David Whitelaw 06/11/2024 Dear Zutari Staff, Attached please find comments relating to the restructuring of the WWTW at Macassar.	28/10/2024 Good Day David, Thank you for your email. Kindly note that you have been added to our stakeholder database. Kind Regards Marianna Taljaard 12/11/2024 Dear Mr Whitelaw, I hope you are doing well. The project team is in process to respond to your queries re the Macassar WWTW. Can you please confirm whether the “pans” you are referring to is the maturation ponds (4 large maturation ponds - see image below) or the old sludge lagoons? Perhaps you can indicate to us on a google map snip.

Comment on proposed alterations to the Macassar WWTW.

Introduction: Wetlands are a type of habitat which is under stress and WWTW have been shown to be an important type of wetland. Strandfontein is a world-renowned Birding area based on the settling pans of the WWTW. It is a Ramsar site which is recognition that it is of international importance. Mitchell's Plain and Athlone WWTW are both important as wetlands supporting over 100 species of water birds (ducks, grebes, cormorant herons, gulls and waders).

A major omission in this assessment is the omission of any attempt to assess the avifauna of the area. It is an extremely rich birding area with over 200 species having been recorded in the area.

With the increasing population it is reasonable to expect WWTW should need to be able to treat an increasing volume of water. The initial Works built at Macassar in the 1970s resulted in a decrease in the area of the Eerste River estuary. This is an regrettable as it is an Important natural wetland. It is proposed that treated water from the WWTW will restore the estuary.

As noted above settling pans can also produce an important bird habitat.

Development of the WWTW: As noted the expansion will encroach on the Cape Flats Strandveld. While an attempt to maintain the plants which have been removed and reintroduced. Will a botanist or someone from SANBI be consulted to ensure that the area can be optimally repopulated with these plants?

Summary: These are critical elements.

- i) → Ensuring that the water reintroduced to the Eerste River improves the estuary.
- ii) → That the pans to be constructed be structured to ensure that they provide a bird habitat. The City's Biodiversity Diversity Branch could be consulted to ensure that these issues are optimally managed.
- iii) → That the roads to be constructed be made available to birders to access both the pans in the WWTW and the estuary.
- iv) → That everything possible is done to minimise damage to the endangered Strandveld.



David Whitelaw

Cape Bird Club Conservation Committee

Regards,

David Whitelaw

CBC Conservation Committee



Kind Regards
Corlie Steyn

12/11/2024

Dear Ms. Steyn,
I was referring to the maturation ponds.
Regards,
David Whitelaw

13/11/2024

Dear Mr Whitelaw,
Thank you for the confirmation that you were referring to the maturation ponds.
Please see attached a response to your letter (received on 6 November 2024) that has been prepared by the project team to address your concerns.

13 November 2024

Mr D Whitelaw
Cape Bird Club
Conservation Committee
Email: daviesu@mweb.co.za

Dear Mr Whitelaw

Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment

Your email and letter dated 11 November has reference.

Thank you for making the time to raise comments during the public participation process for the upgrade or the Macassar Treatment works.

Zutari noted that you are responding on behalf of the Cape Bird Club.

1. Specialist studies

Your letter provided background to the importance of wetland habitat for birds and that WWTW have been shown to be important types of wetlands. You mention that the draft BAR (assessment) has omitted any attempt to assess the avifauna of the area.

The Macassar Treatment works received environmental authorisation on 7 July 2017. For this initial application all sensitivities were assessed at the time. The current application pertains to the upgrade of the facility. For this purpose, a screening tool report was generated (making use of the National Screening Tool), and the sensitivities identified for the site are included in Table 1 below.

Table 1: Environmental sensitivities picked up by the national screening tool.

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme		X		
Animal Species Theme		X		
Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme				X
Civil Aviation Theme			X	
Defence Theme				X
Plant Species Theme			X	
Terrestrial Biodiversity Theme	X			

A bird study was not identified by the National Screening Tool as a sensitivity and therefore a separate study has not been conducted. The following studies formed part of the Basic assessment:

1. Agricultural Impact Assessment
2. Archaeological and Cultural Heritage Impact Assessment

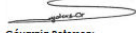


				ZUTARI 3. Palaeontology Impact Assessment 4. Terrestrial Biodiversity Impact Assessment 5. Aquatic Biodiversity Impact Assessment 6. Plant Species Assessment (Ecology) 7. Animal Species Assessment (Part of the Biodiversity assessment) 8. Defence Statement However, Zutari notes your concern in reference to provide ample habitat for birds at the Macassar WWTW. Please see below our responses to your concerns. Summary i) Ensuring that the water reintroduced to the Eerste River improves the estuary. Due to the time that has passed since the environmental approval in 2017, new design engineers have been appointed to finalise the detailed design of the Macassar WWTW. The design engineers have identified alternative technology options that will enable the works to run more efficiently and improve the quality of the effluent discharged into the estuary. Once the Macassar WWTW upgrade is completed, the effluent introduced to the Eerste River will be of an improved quality ensuring compliance with all regulatory requirements outlined in the Water Use License. The license is currently being amended to reflect these improvements, ensuring that the effluent quality requirements align with the recommendations set forth in the "Aquatic Biodiversity Assessment for the Proposed Expansion of the Existing Macassar WWTW," dated November 2023. ii) That the pans to be constructed be structured to ensure that they provide a bird habitat. The City's Biodiversity Diversity Branch could be consulted to ensure that these issues are optimally managed. The existing maturation ponds (referred to as pans in the current context) will undergo minor alterations which includes cleaning (i.e., removal of existing sludge) and concrete lining a small portion of one of the ponds. However, the birds will still have access to the ponds. iii) That the roads to be constricted be made available to birders to access both the pans in the WWTW and the estuary. An external road will be provided for public access to the beach and estuary. This road will run along the outer perimeter of the WWTW security fencing. The maturation ponds form part of the WWTW and will be enclosed within a fenced area, direct public access to the ponds will require special permission from the City of Cape Town. For safety and security reasons, it is essential that access to the plant is carefully controlled. Birdwatchers interested in accessing the maturation ponds will need to coordinate directly with the WWTW's operational staff for permission. iv) That everything possible is done to minimise damage to the endangered Strandveldt. A specialist study has been conducted in this regard and is appended as Appendix G.2. All mitigation measures have been incorporated into the Maintenance Management Plan to secure minimal impact on the endangered vegetation. Furthermore, a biodiversity offset is in process to help minimise impacts on the endangered vegetation. Kind regards  Corlie Steyn Senior Environmental Practitioner  Project number 1001780, Letter to Mr. Mphahlele.docx, 2024/11/15, Rev 0 Please do not hesitate to ask for any further clarity. Kind regards Corlie Steyn
8.1_9	Portia Makitla	Dept. of Forestry, Fisheries & the Environment B&C: Biodiversity Mainstreaming EIA	29/10/2024 Good day Corlie I hope you are well. We received the updated report with the Biodiversity Offset report, I would like to propose a site visit/meeting to discuss the proposed project especially the offset. May you kindly suggest any two dates in November before PPP due date, if possible, please extend the invite to the competent authority am not sure if is DFFE or province. Please look at any day from the 15 November. Best Regards Portia Makitla	30/10/2024 Good day All, The site visit for the Macassar Treatment Works Upgrade will take place on 20 November 2024. Time and meeting point: 10:30 at the Macassar Treatment Works We will provide more detail in due course. Kind regards Corlie Steyn
				01/11/2024 Good day All,

				Thank you, Eldon, for the calendar invite. If there is anyone who did not receive the invite, please let us know. Please see attached the program for the site visit. Site Visit 20 November 2024 <table><tr><td>Project number</td><td>Ref. No.: 16/3/3/1/A3/39/2054/24</td><td>Meeting date</td><td>2024-11-20</td></tr><tr><td>Project name</td><td colspan="3">Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment</td></tr><tr><td>Meeting/subject</td><td colspan="3">Macassar: Site visit</td></tr></table> <table><tr><th>Item</th><th>Time</th><th>Program for the site visit</th><th>Speaker</th></tr><tr><td>1.</td><td>10:20</td><td>Meet at Macassar WWTW (sign in)</td><td></td></tr><tr><td></td><td></td><td>Introductions</td><td></td></tr><tr><td></td><td></td><td>People attending:</td><td></td></tr><tr><td></td><td></td><td> 1. Portia Makitla: Department of Forestry, Fisheries & the Environment (DFFE) B&C: Biodiversity Mainstreaming EIA 2. Nompumelelo Lejalekale: Department of Forestry, Fisheries & the Environment (DFFE) B&C: Biodiversity Mainstreaming EIA 3. Eldon van Boom: Department of Environmental Management and Development Planning (DEA&DP) 4. Taryn Dreyer Department of Environmental Management and Development Planning (DEA&DP) 5. Rondine Isaacs Department of Environmental Management and Development Planning (DEA&DP) 6. Cliff Dorse (Biodiversity Management Branch: City of Cape Town: Biodiversity Management Branch) 7. Bianca Bleuler (Scientific Terrestrial Services) 8. Stephen van Staden (Scientific Terrestrial Services – possibly join online during the concluding remarks session) 9. Samantha Daniels (Scientific Terrestrial Services – possibly join online during the concluding remarks session) 10. Ammaarah Baradien (Zutari) 11. Wynand Loftus (Zutari) 12. Corlie Steyn (Zutari – possibly join online during the concluding remarks session) </td><td>Wynand</td></tr><tr><td>3.</td><td>10: 45</td><td>Brief background on Biodiversity Offset Process</td><td>Bianca</td></tr><tr><td>4.</td><td>11:00</td><td>Brief project background and proposal WWTW – Upgrade</td><td>Ammaarah</td></tr><tr><td>5.</td><td>11:15</td><td>Offset area (Option 1) visit</td><td>Bianca and Cliff</td></tr><tr><td>6.</td><td>11:45</td><td>Offset area (Option 7) visit</td><td>Bianca and Cliff</td></tr><tr><td>7.</td><td>13:00</td><td>Meet at Scientific Terrestrial Services office: Concluding remarks / discussions</td><td>All</td></tr></table> You are welcome to let us know should there be any additional points to be added. Kind regards Corlie Steyn	Project number	Ref. No.: 16/3/3/1/A3/39/2054/24	Meeting date	2024-11-20	Project name	Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment			Meeting/subject	Macassar: Site visit			Item	Time	Program for the site visit	Speaker	1.	10:20	Meet at Macassar WWTW (sign in)				Introductions				People attending:				1. Portia Makitla: Department of Forestry, Fisheries & the Environment (DFFE) B&C: Biodiversity Mainstreaming EIA 2. Nompumelelo Lejalekale: Department of Forestry, Fisheries & the Environment (DFFE) B&C: Biodiversity Mainstreaming EIA 3. Eldon van Boom: Department of Environmental Management and Development Planning (DEA&DP) 4. Taryn Dreyer Department of Environmental Management and Development Planning (DEA&DP) 5. Rondine Isaacs Department of Environmental Management and Development Planning (DEA&DP) 6. Cliff Dorse (Biodiversity Management Branch: City of Cape Town: Biodiversity Management Branch) 7. Bianca Bleuler (Scientific Terrestrial Services) 8. Stephen van Staden (Scientific Terrestrial Services – possibly join online during the concluding remarks session) 9. Samantha Daniels (Scientific Terrestrial Services – possibly join online during the concluding remarks session) 10. Ammaarah Baradien (Zutari) 11. Wynand Loftus (Zutari) 12. Corlie Steyn (Zutari – possibly join online during the concluding remarks session)	Wynand	3.	10: 45	Brief background on Biodiversity Offset Process	Bianca	4.	11:00	Brief project background and proposal WWTW – Upgrade	Ammaarah	5.	11:15	Offset area (Option 1) visit	Bianca and Cliff	6.	11:45	Offset area (Option 7) visit	Bianca and Cliff	7.	13:00	Meet at Scientific Terrestrial Services office: Concluding remarks / discussions	All
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8.1_10	David Byers	Retired Water Engineer	30/10/2024	11/11/2024 Good Day David, Trust you are well. Kindly note that you have been added to our stakeholder database. Kind Regards Marianna Taljaard																																																				

			Name David Byers Organization Retired Water Engineer Role Oversight CommentsOrQuestions Please add name to register of CIEA This form submitted at: https://www.zutari.com/macassar-www-public-participation/ © Zutari	
8.1_11.1	Department of Environmental Affairs and Development Planning	Dept. of Environmental Affairs and Development Planning	29/10/2024 Dear Sir/Madam, The Directorate acknowledges the receipt of your correspondence. Kind Regards DEADP EIA ADMIN	
8.1_11.2			31/10/2024 Dear Sir/Madam, The Directorate acknowledges the receipt of your correspondence. Kind Regards DEADP EIA ADMIN	
8.1_12	Chantel Erlank Chantel.Erlank@capetown.gov.za	City of Cape Town	05/11/2024 Good Day Thank you for the information provided. Kindly be advised that I no longer work for the branch, kindly contact Gévarnia Petersen via these two email addresses for further assistance: SWMLUM@capetown.gov.za SWMBDM@capetown.gov.za Thank you, Regards, Chantel Erlank	11/11/2024 Dear Chantel Thank you for your email. We will remove your details from our database. @Gévarnia Petersen Please do not hesitate to reach out should you need any additional information. Kind Regards Marianna Taljaard
8.1_13	Phawulwethu Cengani	Dept. Agriculture, Land Reform & Rural Development	07/11/2024 Good Day All I trust this email finds you well!	07/11/2024 Good day Phawulwethu, Thank you for your email and acknowledgement of the draft BAR. Please let us know if we can assist in any way should there be questions. Kind regards

			This email serves as an acknowledgment of receipt of the BAR Report draft attached. I have copied in the official responsible for the district on the email and she will be attending to it shortly. Kind Regards Phawulwethu Cengani	Corlie Steyn
			07/11/2024 Our office will certainly reach out should we seek clarity or any other information. Kind Regards Phawulwethu Cengani	
8.1_14	Gévarnia Petersen	City of Cape Town Land Use Applications	16/11/2024 Dear Marianna, Kindly see attached comments from Waste Services. Gévarnia Petersen  CITY OF CAPE TOWN ISIIXEKO SASEKAPA STAD KAAPSTAD WASTE SERVICES: COLLECTIONS DEPARTMENT: RESEARCH AND DEVELOPMENT Gévarnia Petersen Senior Clerk T: +27 21 400 5239 E: SWMLUM@capetown.gov.za Reference Number: 16 NOVEMBER 2024 Date: 16 NOVEMBER 2024 Subject: MACASSAR WWTW, CAPACITY EXTENSION AND ASSOCIATED INFRASTRUCTURE REFINISHMENT, WESTERN CAPE Attention: MARIANNA TALJAARD The council wishes to ensure that all new developments, require planning permission, contain suitable accommodation for the storage and disposal of waste to a licenced landfill site. Council reserves the right to service all residential properties that falls within its boundaries for refuse removal services. In terms of the Waste Management Tariff Policy, section 18.2.1 all residential properties are compelled to use council refuse removal services and may not use private contractors directly. Please refer to the attached Waste management tariff policy for more information. Non-residential properties may opt to use either Council services or a private contractor directly. ENVIRONMENTAL IMPACT ASSESSMENTS (EIA) – MACASSAR WWTW, CAPACITY EXTENSION AND ASSOCIATED INFRASTRUCTURE REFINISHMENT, WESTERN CAPE WITH REFERENCE TO YOUR EMAIL DATED 11 NOVEMBER 2024 FROM MARIANNA TALJAARD, PLEASE SEE COMMENTS HEREUNDER. In connection with the above proposal / development, I confirm that Solid Waste (Collections) as the Service Provider in the Macassar Area has NO OBJECTION to proposal and has sufficient unallocated capacity to accept and collect and dispose of all types of waste to a designated licence landfill site. A good waste management system must be in place to handle all waste generated by the activities and to mitigate against negative impact on the environment. The generation of construction waste and waste during the operation phases should be recycled on site or re used to fill up other sites and clean builder's rubble can be disposed of at the nearest licenced under the guidance of the City of Cape Town. Please refer to the attached disposal tariff list for more information. The waste generated by the construction personnel e.g. lunch remains and packaging etc. must be placed in approved refuse bins on site during the construction phases. The proposed development will not have any implications on the infrastructure of the area provided that the contractors identify a permitted refuse disposal site for various categories of waste, provided that a refuse room is included in the planning stages of the development for the storage of waste to the satisfaction of the Director: Solid Waste Management. A. STANDARD BUILDING REGULATIONS: CONDITIONS FOR REMOVAL / COLLECTION OF REFUSE Applicable to sectional title or cluster development, secured complexes, flat complex, shopping mall/centre (retail) or office complexes, factories and warehousing. U1- PROVISION OF AREAS Any building, excluding a dwelling house, in which refuse will be generated, shall be provided with an adequate centralised refuse room (which comply with the attached standards and guidelines for refuse storage areas). That the refuse room be provided in a position nearest to an access road (public road) and be accessible for the Council's refuse collection vehicles at all times as this vehicle and its crew members (Council staff) will not enter onto private property. Premises such as Places of worship (churches, mosques and temples) and vacant land units do not require a refuse room however if the complex is large with function halls and large volumes of waste is generated or the vacant land is earmarked for (depending on the land use zoning status) then a refuse room may be considered at the discretion of the Director: Solid Waste Management. CIVIC CENTRE IKIRO LEENKONZO ZOLUNTU BURGERSENTRUM 12 HERTZOG BOULEVARD CAPE TOWN 8001 PO BOX 298 CAPE TOWN 8000 www.capetown.gov.za Making progress possible. Together.	22/11/2024 Dear Me G Petersen, Thank you for your comments. Please see communication attached. Kind regards Corlie Steyn Letter to Waste Services_CTT.pdf 118 KB Appendix H.1 Macassar WWTW EMP.pdf 2 MB  IMPACT. ENGINEERED. 22 November 2024 Water Services: Collections Department Research and Development City of Cape Town Email: SWMLUM@capetown.gov.za Dear Me Petersen Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment Your email and letter dated 16 November has reference. Thank you for making the time to raise comments during the public participation process for the upgrade or the Macassar Treatment works. It is noted that there is no objection to the proposal. A good waste management system will be in place to handle all waste generated by the activities and to mitigate against negative impact on the environment. Zutari would like to confirm that point A and B in your letter has been addressed in the Environmental Management Plan (for ease of reference attached and summarised below). U1- PROVISION OF AREAS Under Section 3.8 Construction Site Camp & Associated Facilities, a "Waste Storage Area" is listed as a requirement for the Contractor. U2 – ACCESS TO AREA The City's refuse collection vehicles will not be required to collect construction waste. Under Section 3.18 Waste Management it is noted "All other litter and refuse shall be disposed of off-site at an appropriate licenced Waste Disposal Facility. The Contractor shall supply the Employer's Agent with a certificate of disposal" and "As a last resort all construction waste shall be disposed of off-site at a licenced Waste Disposal Facility. The Contractor shall supply the Employer's Agent with a certificate of disposal." HAZARDOUS BIOLOGICAL OR CHEMICAL WASTE Under Section 3.18 Waste Management, "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." Kind regards  Corlie Steyn Senior Environmental Practitioner Zutari (Pty) Ltd / Reg No 18770037/1107 / Board of Directors (2022/23): Tobi Gengeni (Chairperson), T Dlamini, YC Dlamini, TP Dlamini, Tobi Maseko, Tobi Maseko, J Maseko, Tobi Maseko (Non-Executive Director)

			2 Should there be an existing refuse area in use to accommodate the changes, alterations or additions to the building for the storage of bins, then this area should be utilised for any for any additional bins required for this development, or provision should be made for added space. U2 – ACCESS TO AREA Council's refuse collection vehicles or its staff will not enter private property, therefore the removal of domestic solid waste is effected from the kerbside of a public street. The location of any area contemplated in regulation U1 shall be of such access thereto from any street for the purpose of removing the refuse is of the satisfaction of the local authority. B. HAZARDOUS BIOLOGICAL OR CHEMICAL WASTE No hazardous, chemical or medical waste enters the general waste stream. Solid waste (collections) does not remove hazardous, chemical or medical waste. A private specialised waste company must be engaged for this purpose. These types of waste must be disposed of by a private specialised waste company in accordance with the minimum requirements for the handling classification and disposal of Hazardous waste (DWAR 1998) with the approval by the department of Health. The installation of cellular communications base stations does not require a refuse removal service and does not pose a health risk to the environment. Yours Faithfully,  Gévarnia Pefersen: For the Director: Waste Services CIVIC CENTRE IZIKO LEENKONZO ZOLUNTU BURGERSENTRUM 12 HERTZOG BOULEVARD CAPE TOWN 8001 PO BOX 298 CAPE TOWN 8000 www.capetown.gov.za Making progress possible. Together.	
8.1_15	Cornelia van Zyl	I.C. @ PLAN	20/11/2024 Good afternoon, The attached e-mail refer. Please will you add me to your registered I&AP list for the abovementioned application? Kind Regards/Vriendelike Groete, Cornelia van Zyl Partner	20/11/2024 Dear Cornelia, Thank you for your email. Kindly note that you have been added to our stakeholder database. Kind Regards Marianna Taljaard
8.1_16	Michael Buckham	Cape Bird Club	22/11/2024 Dear Marianna As per the request for letters of comments relating to the Macassar WWTW Project, please find attached a letter from the Cape Bird Club. Please acknowledge receipt of this e-mail in writing. Kind regards Mike Buckham Chairman Cape Bird Club	22/11/2024 Dear Mike, Thank you for your email. We hereby acknowledge receipt of this email and letter. Kind Regards Marianna Taljaard



21 November 2024

The City of Cape Town

To whom it may concern

Submission of comment relating to the upgrade of the Macassar Waste Water Treatment Works

On behalf of the Cape Bird Club, I would like to acknowledge the receipt of the documentation in respect of the upgrade of the Macassar Waste Water Treatment Works and set out comments in respect of the proposal submitted. As the Chairman of the Cape Bird Club, I represent an active group of citizen scientists and nature enthusiasts, living in the City of Cape Town and enjoying the access afforded to them by the numerous nature reserves and protected areas within the city's boundaries. In addition to the protected areas there are many localities, not necessarily within reserves or protected areas, that are popular birding sites and these are also crucial for the engagement our members have with nature and are able to contribute in meaningful ways to the biodiversity of the city. The Macassar Waste Water Treatment Works and the adjacent Eerste River estuary are very good examples of these unprotected areas where birders have opportunities to enjoy the city's birdlife.

We have a membership base of over 600 members, an active social media platform on Instagram, Facebook and WhatsApp and we have regular communication with our members via e-mailed newsletters and through our quarterly magazine, Promerops.

We are an extremely active club with monthly members' meetings as well as at least 4 outings a month to various sites within the city and its surrounds. We have recently celebrated our 75th anniversary, making us the second oldest bird club in South Africa and we are officially the largest with the highest membership numbers.

PO Box 2113 Clareinch 7740
Website: www.capebirdclub.org.za
E-mail: information@capebirdclub.org.za

We have an active conservation component to the club, donating tens of thousands of rands to a variety of important conservation efforts which include tracking of the endangered Black Harrier, SANCCOB, habitat conservation and multiple outreach programs to schools on the peninsula.

The Macassar Dunes Conservation Area and the adjacent Macassar Waste Water Treatment Works have become very popular and important sites for many of our members over the years. We recently had a club outing at the sites and attracted over 100 participants to that outing. It was officially our largest group on record for one of our outings, showing the popularity (photos of the outing below).



PO Box 2113 Clareinch 7740
Website: www.capebirdclub.org.za
E-mail: information@capebirdclub.org.za

It has always been a site that has been easily accessible on reasonably well-maintained roads and has given us access to multiple birding habitats. The birding habitats include:

- The bridge crossing over the Eerste River at the access road turn off, offering river and scrub birds like Common Reed Warbler, Southern Masked Weaver, Red-faced Mousebird and the breeding colony of European Bee-eaters
- The dune strandveld for endemic birds like Grey-backed Cisticola, Fiscal Flycatcher, Cape Bulbul and Karoo Scrub Robin
- The settling ponds once inside the waste water plant area which has always been an attraction for waterfowl such as ducks and geese, grebes and waders as well as rarities over the years such as Allen's Gallinule
- The Eerste River Estuary, which is most likely the most popular attraction as it is one of very few accessible estuaries within the city. For birders to enjoy the terns and waders of an estuary the only other options are to travel further afield. Furthermore, the Eerste River viewpoints from the currently accessible roads are perfect for birders where they can scan for interesting birds from the road without disturbing the tern and wader flocks. This site has produced many rare and special birds over the years and has hosted many hundreds of bird enthusiasts who have enjoyed the site and the ease of access in getting to it. The list is long but includes birds like Tibetan Sand Plover, Baird's Sandpiper, Elegant Tern, Lesser Crested Tern and Eurasian Oystercatcher.

The Google Map image below shows the site with the areas that are most accessed by birders reflected in the red highlighted pen. This excludes the entrance road and its surrounding strandveld as it is not expected that they will be impacted by the upgrade.



PO Box 2113 Clareinch 7740
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This Google Image is referred to below.

As a club that operates within a metropole such as the City of Cape Town we do appreciate the fine balance between the needs of the residents of the city and the conservation of natural areas, but we do try and motivate for solutions that are able to satisfy both. We also appreciate the importance of a fully functioning and efficient waste water treatment works and we are very positive about the impact the improvement of the works will have on the estuary as, we have noted, as birders at the site, that the obvious pollutive impact of the river from the works has had a detrimental impact on the diversity and volume of bird species on the estuary. A few years back the estuary was teeming with birdlife, but this has certainly deteriorated due to the quality of the water.

When reading the documentation sent and assessing the proposal, we are appreciative of the three listed biodiversity set offs and we support the thought and effort applied here, but unfortunately none of these are going to compensate for the loss of access to the most critical viewing areas within the proposed development.

We note that the documentation refers to the environmental impact and the mitigating mechanisms to minimise that but I inserted the search phrase "birders" in the document's search box and not a single result came up. It is a comprehensive document, dealing with many different aspects to minimise impact but to have ignored the recreational appeal of the site for birders as an entire interested group is disappointing for us at the Cape Bird Club. To me there is an element of ignorance as to the number of activities that are conducted at the site and one of the major ones has been completely missed.

We note with great concern that the proposed new layout appears to be an expansion of settling ponds to the west (which is currently open strandveld and a popular settling pond for birders) and the erection of a boundary fence all the way around the works, cutting access off to birders from the most popular birding site which is the roadway that overlooks the Eerste River Estuary.

From our assessment of the new layout, it appears as if birders will no longer be able to view birds in the productive settling ponds nor will we be able to drive through to the current viewpoint. We will now only have access to strandveld habitat and ultimately a view of the beach where the fishermen access their fishing areas. Birders will not be able to traverse the eastern edge of the estuary and view the waders and tern roosts.

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			The Google Image above reflects the ideal access for birders which includes the sections overlooking the estuary as well as portions of the road overlooking the settling ponds adjacent to the river. In addition to the concern we have regarding the accessibility of these prime birding areas we would also like to stress that we would need to understand the improvement in security for the area. We see there is a great deal of resource being applied to the upgrade of the works and we feel that budget should be allocated to security within the area that birders and other users will access. By fencing the wastewater treatment works with no access for birders it is a concern that the areas outside the fence will no longer be a priority to the city officials and that will result in a decline in safety for birders, making it even less appealing to visit. The presence of birders and regular traffic would surely improve the overall aesthetic and functionality for the area. In order to conclude my concerns for this letter to the city, I would like to propose questions that we would be grateful to hear answers to as key users of a site that is now seemingly headed for a fundamental change that will render it unusable. Question 1: Why has the perimeter fence been constructed in such a manner as to entirely cut off the access to the most critical birding area? Question 2: Please explain why the impact assessment performed did not consider birders, as the proposed layout is substantially damaging to the ongoing accommodation of birders to the site. In the current iteration it is no longer a site that will be of any appeal to birders. Question 3: Please explain how security is going to be improved around the perimeter fence and how the complete isolation of the new treatment works is going to be able to facilitate greater safety for birders that are birding outside the perimeter fence. Question 4: Why has there been no contemplation of a check-in gate where users can sign in to improve security and to track the number of visitors and the ongoing importance to recreational users? PO Box 2113 Clareinch 7740 Websiter: www.capebirdclub.org.za E-mail: information@capebirdclub.org.za	
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In conclusion, we are grateful for being included in the PPP and we are very supportive of the proposal to improve the quality of the water being discharged into the Eerste River through a more efficient operational waste water treatment works but we are disappointed by the lack of consideration for a very large and important user base of the site in birders and the Cape Bird Club.

We look forward to your considered responses to the questions above.

Kind Regards



Mike Buckham
Chairman, Cape Bird Club

PO Box 2113 Clareinch 7740
Website: www.capebirdclub.org.za
E-mail: information@capebirdclub.org.za

29/11/2024

Dear Mr Buckham,
Please see attached the correspondence from the project team pertaining to your letter dated 21 November 2024.

Please do not hesitate should you have any additional questions.

Kind regards

Corlie Steyn



Your letter provided background to the importance of wetland habitat for birds and that WWTW have been shown to be important types of wetlands. You mention that the draft BAR (assessment) has omitted any attempt to assess the avifauna of the area.

The Macassar Treatment works received environmental authorisation on 7 July 2017. For this initial application all sensitivities were assessed at the time. The current application pertains to the upgrade of the facility. For this purpose, a screening tool report was generated (making use of the National Screening Tool), as per legislation and the sensitivities identified for the site are included in Table 1 below.

Table 1: Environmental sensitivities picked up by the national screening tool.

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme		X		
Animal Species Theme		X		
Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme				X
Civil Aviation Theme			X	
Defence Theme				X
Plant Species Theme			X	
Terrestrial Biodiversity Theme	X			

A bird study was not identified by the National Screening Tool as a sensitivity and therefore a separate study has not been conducted. The following studies formed part of the Basic assessment:

1. Agricultural Impact Assessment
2. Archaeological and Cultural Heritage Impact Assessment
3. Palaeontology Impact Assessment
4. Terrestrial Biodiversity Impact Assessment
5. Aquatic Biodiversity Impact Assessment
6. Plant Species Assessment (Ecology)
7. Animal Species Assessment (Part of the Biodiversity assessment)
8. Defence Statement

The impact on birdlife as such has therefore not been identified as a sensitivity however Zutari takes note that the access to the area has been raised as a concern and has provided answers in this regard under questions 1 and 4.

Question 3:
Please explain how security is going to be improved around the perimeter fence and how the complete isolation of the new treatment works is going to be able to facilitate greater safety for birders that are birding outside the perimeter fence.

The upgrade of the WWTW will include high security fence which contains thermal cameras (CCTV) with overlapping coverage to monitor the surrounding areas. Security lighting will be mounted on poles providing lighting slightly beyond the fenced area. In addition, the perimeter road inside of the WWTW will also have plant security patrolling the road through different times of the day.

It is noted that the main purpose of the high security fence and associated infrastructure is to protect the infrastructure of the WWTW as this is utility and the purpose of the WWTW is to treat the sewage and discharge effluent into water body. Birders accessing the Macassar birding areas will enter via a security hut at the intersection of Macassar road and Tie road, see question 4 below for further details. Birders are advised to liaise directly with the WWTW operational staff for access to areas within the WWTW development where birding will be required and the details of this agreement and arrangements (i.e., health and safety inductions, being accompanied by plant staff, hours which birding is accessible) falls outside of the purview of the upgrade of the development as this will be dealt with at an operational level.

				ZUTARI Question 4: Why has there been no contemplation of a check-in gate where users can sign in to improve security and to track the number of visitors and the ongoing importance to recreational users? As part of the upgrade of the WWTW, a security hut has been allowed for to manage public access via the treatment works access road to the dunes, beach and greater estuary area. The security hut will be manned with guards and will be managed by the City of Cape Town Biodiversity Branch and its intention is to mitigate against crime in this area as well as eliminate illegal activities that take place along Tie road leading to the WWTW and surrounding dune areas. Kind regards  Corlie Steyn Senior Environmental Practitioner Project number: 1001785, Letter to Cape Bird Club_Final.docx, 2024/11/25, Rev 0 
8.1_17	Amanda Thulisile Magubane	Department of Forestry, Fisheries and the Environment (DFFE)	25/11/2024 Name Amanda Thulisile Magubane Organization DFFE  CommentsOrQuestions . This form submitted at: https://www.zutari.com/macassar-wwtw-public-participation/	27/11/2024 Good Day Amanda, Trust you are well. Kindly note that you have been added to our stakeholder database. Kind Regards Marianna Taljaard

Province. This WC: PCI/IP 2022-2027 was adopted by the Provincial MEC for Local Government, Environmental Affairs and Development Planning on 19 May 2023 and is available upon request.

- 1.3. A key priority of the PCI/IP is the Estuary Management Programme, which is implemented in accordance with the NE/I: IC/IA and the National Estuarine Management Protocol ("NE/I: IP"). Relevant guidelines, Estuarine Management Plans, Mouth Management Plans need to be considered when any listed activities are triggered in the Estuarine Functional Zone. The Department is in the process of approving a series of Estuarine Management Plans.
- 1.4. The facilitation of public access to the coast is an objective of the NE/I: IC/IA as well as a Priority in the WC: PCI/IP. The Department developed the Provincial Coastal Access Strategy and Plan, 2017 ("PCASP") and commissioned coastal access audits per municipal district to assist municipalities with identifying existing, historic, and desired public coastal access. These coastal access audits also identify hotspots or areas of conflict to assist the municipalities with facilitating public access in terms of Section 18 of the NE/I: IC/IA. The PCASP as well as the coastal access audits are available upon request.

2. COMMENT

- 2.1 The sub-directorate: Coastal Management ("SD: C/I") has reviewed the information as specified above and have the following commentary:
 - 2.1.1. According to the draft BAR, the Department issued an environmental authorisation ('EA') to the City of Cape Town ('CCT') on 07 July 2016 approving the upgrade and expansion of the Macassar Wastewater Treatment Works ("WWTW") and associated infrastructure. However, due to time lapsed with implementation of the EA, new design engineers have been appointed to finalise the detailed design. It is further noted that the design engineers have identified alternative technology options that will enable the WWTW to run more efficiently and improve the quality of effluent being discharged into the estuary. An application is being made to amend the previous EA dated 07 July 2016 to include the new project description. Apart from rapid urbanisation, the Macassar WWTW is not able to treat wastewater adequately resulting in poor effluent quality being discharged into the Eerste River. The CCT has therefore prioritised the upgrade of the Macassar WWTW to address the poor quality of effluent being discharged. The CCT also proposes electrical infrastructure as part of the refurbishment of the WWTW, the proposed electrical infrastructure will supply the Macassar WWTW with power, sourcing it from the nearest Eskom substation.

ZUTARI

environment from pollution and may thus support the environmental management of the surrounding coastal area.
Zutari will however amend the BAR to include the background and make reference and the applicability to the NEM: ICMA that has been addressed in the previous EIA process.

2.1.4 Please note that Section 62 of the NEM: ICMA is seen as not applicable since the project entails refurbishment of the existing WWTW, however, Zutari will amend the BAR to include the background and make reference and the applicability to the NEM: ICMA.

2.1.5 Confirmed.

2.1.6 Confirmed.

2.1.7 Zutari noted the support and the information is confirmed.

2.1.8 The concern raised in reference to the social impact has been noted especially that Ward 109 has been impacted re damaged underground electrical cables that consequently caused major power outages for lengthy periods of times especially throughout 2023 and 2024 – negatively impacting the local residents. Additional mitigation measures have been added and have been captured in the Final EMPr to address this issue. A wayleave process will be followed where the engineers/contractors will have to consider existing services as part of their design and any construction related activities. For areas which are congested with services (as guided by the wayleave process and available as-builts), hand excavation will be allowed for to ensure mitigation to damages to underground services. In addition to the mitigation measures, if a service is damaged as part of construction activities associated with the upgrade of the WWTW, the services will be reinstated immediately as part of this project. Contractors will be required to use competent sub-contractors with proven track records who undertake the work in accordance with the specification and the EMPr (which includes mitigation measures). In addition, the works outside of the WWTW boundary will be monitored closely by the city and the construction monitoring team. Any work that is carried out on any electrical substations under this project, will be planned appropriately with the necessary wayleaves in place to reduce any outage time and the City will communicate details of these upgrades to business, residents and other users timeously. The contractors will be subject to the conditions of contract and failure in adhering to the scope of works (including the EMPr) will result in the Employer (City of Cape Town) applying the contract and applying penalties.

2.1.9 Zutari notes that no objection to the proposed project has been raised.

Kind regards



Corlie Steyn
Senior Environmental Practitioner



- 2.1.2. It is noted that the proposed site is considered a brownfield site with some of the new proposed infrastructure to be located on open areas within the cadastral boundaries of the Ilacassar WWTW. The applicant adequately identified the subject area in relation to critical biodiversity and ecological support areas in accordance with the Western Cape Biodiversity Spatial Plan, 2017 as well as the management objectives of these areas. The applicant also highlighted the significance of the Lower Eerste River, the Eerste River Estuary as well as the wetlands associated with the estuary.
- 2.1.3. It is noted on page 33 of the draft BAR that the applicant did not indicate the proposed development in relation to the intention/purpose of the NEI/L:IC/LA. Be advised that the CCT undertook proactive measures with the intent to address a multitude of growing pressures along its coastline by delineating a coastal urban edge along the City's coastline in terms of the requirements for coastal management lines in terms of the NEI/L:IC/LA. The MEC for Local Government, Environmental Affairs & Development Planning formally established the CCT's Coastal Urban Edge as the CCT coastal management line ("C/IL") in terms of Section 25 of the NEI/L:IC/LA on 19 March 2021. The entire existing and proposed development is located seaward of the CCT Coastal Urban Edge/C/IL, however, the SD: C/L notes the nature of the development warrants its placement seaward of the CCT's Coastal Urban Edge as it forms part of essential services.
- 2.1.4. The site is also within the Coastal Protection Zone ("CPZ") as defined in Section 16 of the NEI/L:IC/LA and the purpose of the CPZ is to avoid increasing the effect or severity of natural hazards in the coastal zone and to protect people and properties from risks arising from dynamic coastal processes, including the risk of sea level risks. Due to the subject property's location within the CPZ, Section 63 of the NEI/L:IC/LA must be considered where an authorisation is required in terms of Chapter 5 of the NEI/LA. Furthermore, Section 62 of the NEI/L:IC/LA obliges all organs of state that regulates the planning of land to apply that legislation in a manner that gives effect to the purpose of the CPZ. As such, Section 63 should be considered by local authorities for land use decision making.
- 2.1.5. It is noted that the Ilacassar WWTW is currently operating in terms of a water use licence dated 21 July 2011 which allows for the treated wastewater to be discharged into the Kuils/ Eerste River and the current WULA amendment is to increase the amount of water to be released annually into the Eerste River and a request for relaxation of the effluent criteria for phosphate. The draft BAR further states that due to the existing discharge of treated wastewater from the Ilacassar WWTW into the Eerste River, the estuary has already been considerably altered and thus the expected impact of an upgrade to this WWTW is likely to be less significant but the proposed increase in the volume of discharge is nevertheless substantial. The proposed upgrades to the WWTW is anticipated to result in an improvement of the existing water quality situation in the Eerste River Estuary.

- 2.1.6. The applicant referenced that in the National Biodiversity Assessment for Estuaries (2011) the Eerste River Estuary should be given a high priority for rehabilitation due to the poor condition of the estuary as the estuary is located within a Marine Protected Area. It is noted that the relevant Estuarine Management Plan for the Eerste River Estuary has also been considered.
- 2.1.7. The proposed upgrade and associated works align with Priority Area 5 of the Western Cape Provincial Coastal Management Programme (2022-2027) which aims to minimise the impacts of pollution on the coastal environment, through the promotion of appropriate mechanism to alleviate potential pollution and improvement of the water quality of the estuary. In this regard, the SD: C/I supports any pollution control- and waste management interventions in order to prevent, minimise and strictly control harmful discharges into coastal ecosystems with appropriate monitoring measures, provided there are no significant changes to the sea water temperature.
- 2.1.8. In terms of the map indicating the route of the proposed electrical infrastructure on page 30 of the draft BAR, it is noted that the construction of the proposed electrical infrastructure is not a major concern from an environmental perspective due to the existing disturbed areas, however it is a matter of concern from a social perspective. The residents of Ward 109 have been negatively impacted upon in recent years by various upgrades to roads, traffic signals as well as development of new residential areas in Ward 109. During these various upgrades, contractors on different occasions have damaged underground electrical cables that consequently caused major power outages for lengthy periods of times especially throughout 2023 and 2024 – negatively impacting the local residents. Additionally, with the intention to link the proposed cables to the nearest Eskom substation, which is already so fragile, there should be proper mitigation measures in place to ensure there will be no collapse of the said substation and infrastructure. Furthermore, it is imperative that should the proposed upgrades be authorised there must be strict conditions stipulating that only accredited and qualified contractors be appointed to undertake the installation of the new proposed electrical infrastructure to ensure that residents of Ward 109 is not negatively impacted upon during the construction and operational phases of the proposed upgrades.
- 2.1.9. Based on the information provided, the SD: C/I does not object to the proposed upgrades to the existing Macassar WWTW, provided that all the above mentioned items are considered and all relevant mitigations measures as stipulated in the Draft Environmental Management Programme and Maintenance Management Plan are strictly adhered to.
3. The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEIA, which, specifically states that: *"...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or*

			stopped, to minimise and rectify such pollution or degradation of the environment..." together with Section 58 of the NEPA: IC/IA which refers to one's duty to avoid causing adverse effects on the coastal environment. 4. The SD: CMA reserves the right to revise its comments and request further information from you based on any information that may be received. Yours faithfully leptieshaam Bekko Digitally signed by leptieshaam Bekko Date: 2024.11.26 13:54:04 +02'00' leptieshaam Bekko CONTROL ENVIRONMENTAL OFFICER SUB-DIRECTORATE: COASTAL MANAGEMENT DATE: 26 November 2024 Page 5 of 5 www.westerncape.gov.za Department of Environmental Affairs and Development Planning	
			29/11/2024 Dear Ms Steyn Your email below and letter to the SD: Coastal Management refers. Thank you for the responses to our comments. Kind Regards Mercia Liddle Environmental Officer: Coastal Management Department of Environmental Affairs and Development Planning Western Cape Government Website: www.westerncape.gov.za/eadp	
8.1_19	Rondine Isaacs	Department of Environmental Affairs and Development Planning	27/11/2024 Dear Mr Keith Olsen Attached please find the correspondence from this Directorate concerning Macassar WWTW. Kind Regards	09/12/2024 Dear Taryn and Rondine, Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment Please see attached the letter applying for the 50-day extension for the above-mentioned project.

DEADP EIA ADMIN
Department of Environmental Affairs and Development Planning
Western Cape Government



Western Cape
Government

Department of Environmental Affairs and Development Planning
Rondine Isaacs
Directorate: Development Management, Region 1
Rondine.isaacs@westerncape.gov.za | Tel: 021 483 4098

REFERENCE: 16/3/31/A3/39/2054/24
DATE: 27 November 2024

The Municipal Manager
City of Cape Town
Water and Sanitation Directorate
Bulk Services Department
8 Voortrekker Road
BELLVILLE
7535

Attention: Mr. Keith Olsen

E-mail: Keith.Olsen@capetown.gov.za

Dear Sir

COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT ("BAR") FOR THE PROPOSED UPGRADE AND EXPANSION OF THE MACASSAR WASTE WATER TREATMENT WORKS ("WWTW") AND ASSOCIATED INFRASTRUCTURE.

1. The abovementioned document as received by this Department via electronic mail correspondence on 15 October 2024, this Department's acknowledgement of receipt letter dated 22 October 2024, and the authorities site inspection/meeting held on 20 November 2024, respectively, refer.

2. This Directorate has considered the draft BAR and has the following comments:

2.1 Description of the proposed development:

2.1.1 According to pages 29 and 30 of the draft BAR, the development proposal will result in the clearance of approximately 2.4ha of Cape Flats Dune Strandveld.

2.1.2 The Terrestrial Biodiversity Impact Assessment Report dated 29 February 2024 as compiled by Nick Helme Botanical Surveys, indicates that approximately 6.8ha of high sensitivity habitat will be lost, including approximately 2.1ha of medium sensitivity habitat, and approximately 13.5ha of low sensitivity.

2.1.3 The Technical Memorandum dated 25 October 2024 as compiled by Scientific Terrestrial Services (Pty) Ltd, indicates the following vegetation communities are present on the proposed site:

- High sensitivity areas: 7.14ha;
- Medium sensitivity areas: 2.23ha; and
- Low sensitivity areas: 9.05ha.

2.1.4 The draft BAR, Terrestrial Biodiversity Impact Assessment Report and Technical Memorandum do not correlate regarding the extent of vegetation habitats present on the proposed site.



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Department of Environmental Affairs and Development Planning

Zutari takes note that the 50-day extension will be calculated from 13 December 2024.

Kind regards

Corlie Steyn

ZUTARI
IMPACT. ENGINEERED.

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Dates: 08/2024
zutari.com

9 December 2024

Me T Dreyer and Me Isaacs
Directorate: Development Management (Region 1)
Department of Environmental Affairs and Development Planning
Western Cape Government

Dear Rondine and Taryn,

Ref No.: 16/3/31/A3/39/2054/24:
MACASSAR WASTEWATER TREATMENT WORKS, CAPACITY EXTENSION AND ASSOCIATED INFRASTRUCTURE REFURBISHMENT: MOTIVATION FOR TIMEFRAME EXTENSION FROM THE DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING (DEADP)

In accordance with Regulation 19(1) of the EIA Regulations, 2014 (as amended), the Final BAR must be submitted to DEA&DP for decision-making within 90 days of receipt of the application by the Department, i.e., the final BAR for the Macassar Wastewater Treatment Works (WWTW) must be submitted on or before 12 December 2024.

With regards to public participation and the new information received during the comment period the NEMA EIA Regulations allow for the extension of the environmental process timeframe, as stated in Regulation 19(1b):

If, however, significant changes have been made or significant new information has been added to the BAR, the applicant/EAP must notify the DEA&DP that an additional 50 days (i.e., 140 days from receipt of the application) would be required for the submission of the BAR. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information.

Following our assessment of the content of the comments received during the Public Participation Process (PPP) for the Macassar WWTW, and the required changes to the documents, Zutari herewith would like to apply, on behalf of the client, for the extension of 50 days, as per the above regulation.

Kind regards

Corlie Steyn
Senior Environmental Practitioner

Cc: keith.olsen@capetown.gov.

Zutari (Pty) Ltd | Reg No: 1977/03271107 | Board of Directors: (P) George (Chairperson), T. Dicks, "AC" Dicks, "PU" Hendricks, "TB" Merg, "NCL" Merg, "J" Nkomo, "GT" Roubis ("Non-Executive Director")



			2.1.5 Please ensure that the BAR reflects the correct extent of indigenous vegetation proposed to be cleared. Further, the Offset Report and project description in the BAR must clearly reflect the total extent of Cape Flats Dune Strandveld vegetation to be cleared. 2.1.6 Further, since an offset is proposed to mitigate for the loss of endangered Cape Flats Dune Strandveld, the details of the proposed offset must be included as part of the project description. 2.2 <u>Applicable listed activities:</u> 2.2.1 According to the draft BAR, a biogas waste to energy facility forms part of the proposed development. 2.2.2 It is noted that Activity 34 of Listing Notice 1 of the Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) was authorised in the Environmental Authorisation referenced "16/3/11/A3/39/2078/14" issued on 07 July 2016. 2.2.3 Since the proposed biogas facility was not authorised in the Environmental Authorisation issued on 07 July 2016, please advise whether Activity 34 of Listing Notice 1 of the EIA Regulations, 2014 (as amended) is triggered by the proposed biogas facility. 2.2.4 Should Activity 34 of Listing Notice 1 be triggered, an updated application form, which contains all the applicable listed activities, must be submitted with the final BAR. 2.2.5 An indication on the estimated electricity to be generated from the proposed biogas facility, should also be provided. 2.2.6 Please advise whether Activities 14 and 51 of Listing Notice 1 are applicable to the proposed biogas facility. If any of these listed activities are applicable to the proposal, please ensure that the impacts are assessed in the BAR and the Environmental Management Programme ("EiMP") is updated accordingly. 2.2.7 According to Section 9-3.2 on page 22 of the BAR, "the proposed development footprint will be located within the boundaries of the property and on portions of the site within the 1:50 year flood line and balance of site in the 1:100-year flood line, and some of the construction activities (limited) proposed might occur within 32m of the Eerste River". Since the proposed site is located outside an urban area, please confirm whether Activity 12 of Listing Notice 1 is applicable. If so, please include the BAR and update the application form. 2.2.8 Please ensure that the updated application form, if applicable, is duly dated and signed by the applicant and Environmental Assessment Practitioner ("EAP"). 2.2.9 Please also ensure that comments are obtained from the City of Cape Town's Air Quality Management Directorate.  www.westerncape.gov.za Department of Environmental Affairs and Development Planning	
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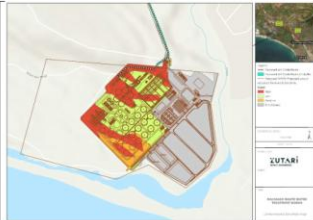
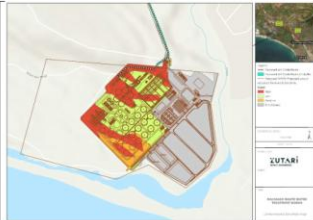
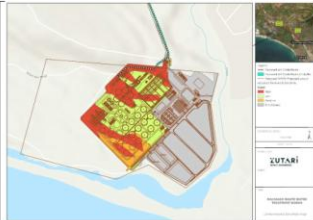
2.3 Proposed biodiversity offset:

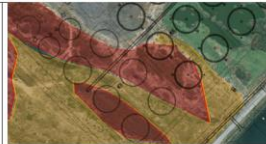
- 2.3.1 The authorities meeting held on 20 November 2024 clarified that the Technical Memorandum dated 25 October 2024 as compiled by Scientific Terrestrial Services (Pty) Ltd., is the Biodiversity Offset Report.
- 2.3.2 Please ensure the Technical Memorandum is amended to indicate the Memorandum is the Biodiversity Offset Report. In this regard, the title and contents of the Memorandum must be amended accordingly.
- 2.3.3 Further, any referral to the need for a comprehensive Biodiversity Offset Report still to be compiled; the development of a Memorandum of Understanding between the relevant parties to establish stewardship of the associated offset sites; and the compilation of a final detailed report outlining the findings and recommendations for the offset strategy, must be rectified as per the discussions held during the authorities meeting.
- 2.3.4 The authorities meeting further clarified that Offset Site 1 is considered to be off-site. As such, please ensure the BAR and Technical Memorandum (Biodiversity Offset Report) are amended to refer to Offset Site 1 as being off-site.
- 2.3.5 It was also indicated that Offset Site 7 is one of the preferred options, but may not be a viable option. In this regard, should Offset Site 7 no longer be considered as viable, this must be reported on and clarified in the BAR and Biodiversity Offset Report. If option 8 is the only option together with Option 1, please ensure the detailed motivation is provided in the Offset Report, given that option 8 is a different terrestrial habitat.
- 2.3.6 The ownership details and zoning of Offset Site 8 on page 9 of the Technical Memorandum has not been provided (except that the property is state-owned). Please ensure that these details are provided in the BAR and Biodiversity Offset Report.
- 2.3.7 Figure 6 on page 16 of the Technical Memorandum indicates: "Vegetation types associated with the candidate offset site options 1, 2, 6 and 6". Please ensure that this is corrected.
- 2.3.8 Furthermore, the co-ordinates and SG 21-digit codes of the respective offset sites must be included in the final BAR.
- 2.3.9 Whilst it is indicated that Offset Site 8 will potentially be declared as a Nature Reserve, there is no indication as to how Offset Sites 1 and 7 will be secured. Please ensure that this is reported on in the BAR and Biodiversity Offset Report.
- 2.3.10 Further, a more detailed explanation on how the mitigation hierarchy has been applied to arrive at the best practicable environmental option (page 75 of the draft BAR), must be included in the BAR.
- 2.3.11 The Directorate notes that the Biodiversity Management Branch ("BIMB") of the City of Cape Town supports the offset specialist's recommendation regarding the three preferred offset sites.



			2.3.12 Although a confirmation letter of support was provided by the City of Cape Town's B1/B, a copy of the signed agreement between the applicant (City of Cape Town's Water and Sanitation Department) and the City of Cape Town's Environmental Resource Management Department (representing the City of Cape Town's B1/B) must be included in the final BAR to indicate who will implement the biodiversity offset on the applicant's behalf. 2.3.13 The Directorate further notes that comments have been obtained from CapeNature in support of the proposed offset. 2.3.14 Please ensure that the Curriculum Vitae of the specialist who compiled the Technical Memorandum (Biodiversity Offset Report) is appended to the final Biodiversity Offset Report. 2.4 <u>Heritage impacts:</u> 2.4.1 It is understood that new roads are proposed as part of this proposal. Please ensure existing roads are used as far as possible. 2.4.2 A Heritage Impact Assessment was conducted and the Heritage specialist has recommended that the gravel road from the entrance to the coast must be placed adjacent to the edge of the facility to avoid fragmentation of the dune landscape. According to the BAR, the appointed engineers have taken this recommendation into account and amended on the layout and the EIPR. 2.4.3 Please ensure that a final comment is obtained from Heritage Western Cape regarding the Heritage Impact Assessment Report dated 11 September 2024, as compiled by ASHA Consulting (Pty) Ltd., and the Paleontological Impact Assessment Report dated 1 March 2024, compiled by Dr Graham Avery. 2.4.4 All comments obtained from Heritage Western Cape, must be addressed prior to the submission of the final BAR. 2.5 <u>General:</u> 2.5.1 Please ensure that the co-ordinates for Erven 1205, 703 and 708, respectively, are provided. 2.6 <u>Public Participation Process:</u> 2.6.1 Please provide proof of the Public Participation Process being conducted for the draft BAR circulated as part of the application phase. This will include (but is not limited to): • Proof that a notice was placed on site and the date of placement; • Proof that an advertisement was placed in the local newspaper; • Proof that the adjacent landowners, ward councillor, local municipality and relevant State Departments/organs of state were notified; • Proof that the draft BAR was placed on the website of Zushi and at the Illoosar Public Library; • Proof that the draft BAR was made available to registered I&APs; • A Comments and Responses Report, indicating all the comments received from I&APs on the draft BAR and the responses thereto; and • A complete list of registered I&APs.  www.westerncape.gov.za Department of Environmental Affairs and Development Planning	
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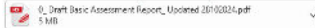
		2.6.2 Please ensure that all comments are adequately addressed prior to the submission of the final BAR. 2.7 <u>Declarations by applicant, EAP and specialists:</u> You are hereby reminded to include the signed declarations from the applicant, EAP and specialists in the final BAR. 3. In accordance with Regulation 19(1) of the EIA Regulations, 2014 (as amended), the final BAR must be submitted within 90 days of receipt of the application by the Department, i.e., the final BAR must be submitted on or before 12 December 2024. 3.1 If, however, significant changes have been made or significant new information has been added to the BAR, the applicant/EAP must notify the Department that an additional 50 days (i.e., 140 days from receipt of the application) would be required for the submission of the BAR. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information. 3.2 Further note, in terms of Regulation 45 of the EIA Regulations, 2014 (as amended), an application in terms of the EIA Regulations, 2014 (as amended) lapses and the competent authority will deem the application as having lapsed, if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless extension has been granted in terms of Regulation 3(7). 4. It is prohibited in terms of Section 24F of the National Environmental Management Act, 1998 (Act No. 107 of 1998) for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of the activity. A person convicted in terms of this prohibition is liable to a fine not exceeding R10 million or imprisonment for a period not exceeding ten years, or to both such fine and imprisonment. 5. Kindly quote the abovementioned reference number in any future correspondence in respect of this application. Yours faithfully Taryn Dreyer Digitally signed by Taryn Dreyer Date: 2024.11.27 10:11:48 +0200 pp MR. ZAAHIR TOEY DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1) CC: (1) Ms. Corlie Steyn (Zutari (Pty) Ltd.) (2) Ms. Azarine van Wyk (City of Cape Town) E-mail: Corlie.Steyn@Zutari.com E-mail: azarine.vanwyk@capetown.gov.za  www.westerncape.gov.za Department of Environmental Affairs and Development Planning	
	09/12/2024 Dear Sir/Madam, The Directorate acknowledges the receipt of your correspondence. <i>Kind Regards</i> DEADP EIA ADMIN Department of Environmental Affairs and Development Planning Western Cape Government Website: www.westerncape.gov.za/eadp	<u>Second Round of PPP:</u> 14/01/2025 Dear Taryn and Rondine, Wishing you all the best for 2025. Please find the LINK to the revised and updated draft BAR (second round PPP), updated EMPR (Appendix H.1), Biodiversity Offset Strategy (Appendix G.8.3), Offset Agreement (Appendix G.8.4), PPP Report (Appendix F – inclusive of the total PPP to date as well as the CRR) in reference to the Proposed Upgrade and Expansion of the Macassar Wastewater Treatment Works: REFERENCE: 16/3/3/1/A3/39/2054/24.  DRAFT BAR TO DEA&DP SECOND ROUND 2025 Please note the second round PP period will start tomorrow: 15 January 2025 - 14 February 2025 Changes to the Draft BAR (Second Round) entail <i>inter alia</i>: - The draft Basic Assessment Report has been updated accordingly on the following pages, namely: Cover page, 4 -6, 8-11, 19-22 ,24, 26-27, 29-34, 37, 41-43, 44-45, 59-60, 80, 86-88, 91, 94-96. For ease of reference the updated sections text is orange in colour, bold and underlined. - The EMPr has been updated with additional changes, please refer to page 8, 9,10,19, and Table 2. The Environmental Management Plan has been amended following on from the comments received during the public participation process. Changes include some	

				additional environmental management / mitigation measures. Additionally distinct project phases have been added where specific environmental management / mitigation measures are applicable per phase. 3. Appendix F has been updated with the PPP to date comprising of the PP Report, meeting records, email and hard copy notifications /letters, adverts, transmittal notes, presentation, database, meeting registers and the Comments and Response Report (CRR) (Appendix F.8). 4. Please note there is also a separate folder with the original comments and responses saved as entries in the CRR. Due to the POPI Act we are not sharing the signed registers, database with contact details or the original comments with the with all the I&APs. You will also receive a notification letter and link to the Zutari website indicating the start of the second round PPP. Please note there will also be a second engagement meeting for the public on 27 January 2025. Furthermore, please find attached a response to your letter dated 27/11/24 Please let me know should you experience any difficulty to access the link or have any questions. Kind regards Corlie Steyn <table><tr><th colspan="3">DEADP: COMMENTS AND RESPONSES ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADE AND EXPANSION OF MACASSAR WASTE WATER TREATMENT WORKS (WWTW) AND ASSOCIATED INFRASTRUCTURE, WESTERN CAPE</th></tr><tr><th>No</th><th>DEADP Comment</th><th>Response</th></tr><tr><td>1.</td><td>The abovementioned document as received by this Department via electronic mail correspondence on 15 October 2024, this Department's acknowledgement of receipt letter dated 22 October 2024, and the authorities site inspection/meeting held on 20 November 2024, respectively, refer.</td><td>Noted, thank you for the comments.</td></tr><tr><td>2.</td><td> This Directorate has considered the draft BAR and has the following comments: <u>2.1 Description of the proposed development:</u> 2.1.1 According to pages 29 and 30 of the draft BAR, the development proposal will result in the clearance of approximately 2.4ha of Cape Flats Dune Strandveld </td><td> The final BAR has been amended to state the following: The development of the proposed upgrade facilities will result in the clearance of approximately approximately 7ha High sensitivity, 2ha Medium sensitivity and 9.3ha Low sensitivity ha of vegetation within an Endangered Ecosystem (Cape Flats Dune Strandveld) as identified in the 2011 National List of Threatened Ecosystems. (2.4 ha forms part of the current authorisation – and has been updated to the reflect to above and correlate with the findings of the specialists) </td></tr><tr><td></td><td></td><td>  To determine the extent of indigenous vegetation (as defined under NEMA) that will be lost, the total habitat classified as indigenous vegetation must be quantified. For the Macassar WWTW, all areas except those identified as Transformed Habitat are assumed to constitute indigenous vegetation (Transformed Habitat within the proposed development layout has been delineated at a high level). Since Transformed Habitat does not meet the criteria for indigenous vegetation, the remaining areas are classified as indigenous vegetation. To calculate the total indigenous vegetation to be lost, the areas identified as high, medium, and low sensitivity. </td></tr><tr><td>2.1.2</td><td>The Terrestrial Biodiversity Impact Assessment Report dated 29 February 2024 as compiled by Nick Heine Botanical Surveys, indicates that approximately 6.8ha of high sensitivity habitat will be</td><td>Correct. Please refer to point 2.1.3 below for clarification to calculations.</td></tr></table>	DEADP: COMMENTS AND RESPONSES ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADE AND EXPANSION OF MACASSAR WASTE WATER TREATMENT WORKS (WWTW) AND ASSOCIATED INFRASTRUCTURE, WESTERN CAPE			No	DEADP Comment	Response	1.	The abovementioned document as received by this Department via electronic mail correspondence on 15 October 2024, this Department's acknowledgement of receipt letter dated 22 October 2024, and the authorities site inspection/meeting held on 20 November 2024, respectively, refer.	Noted, thank you for the comments.	2.	This Directorate has considered the draft BAR and has the following comments: <u>2.1 Description of the proposed development:</u> 2.1.1 According to pages 29 and 30 of the draft BAR, the development proposal will result in the clearance of approximately 2.4ha of Cape Flats Dune Strandveld	The final BAR has been amended to state the following: The development of the proposed upgrade facilities will result in the clearance of approximately approximately 7ha High sensitivity, 2ha Medium sensitivity and 9.3ha Low sensitivity ha of vegetation within an Endangered Ecosystem (Cape Flats Dune Strandveld) as identified in the 2011 National List of Threatened Ecosystems. (2.4 ha forms part of the current authorisation – and has been updated to the reflect to above and correlate with the findings of the specialists)			 To determine the extent of indigenous vegetation (as defined under NEMA) that will be lost, the total habitat classified as indigenous vegetation must be quantified. 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DEADP: COMMENTS AND RESPONSES ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADE AND EXPANSION OF MACASSAR WASTE WATER TREATMENT WORKS (WWTW) AND ASSOCIATED INFRASTRUCTURE, WESTERN CAPE																						
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2.	This Directorate has considered the draft BAR and has the following comments: <u>2.1 Description of the proposed development:</u> 2.1.1 According to pages 29 and 30 of the draft BAR, the development proposal will result in the clearance of approximately 2.4ha of Cape Flats Dune Strandveld	The final BAR has been amended to state the following: The development of the proposed upgrade facilities will result in the clearance of approximately approximately 7ha High sensitivity, 2ha Medium sensitivity and 9.3ha Low sensitivity ha of vegetation within an Endangered Ecosystem (Cape Flats Dune Strandveld) as identified in the 2011 National List of Threatened Ecosystems. (2.4 ha forms part of the current authorisation – and has been updated to the reflect to above and correlate with the findings of the specialists)																				
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2.1.2	The Terrestrial Biodiversity Impact Assessment Report dated 29 February 2024 as compiled by Nick Heine Botanical Surveys, indicates that approximately 6.8ha of high sensitivity habitat will be	Correct. Please refer to point 2.1.3 below for clarification to calculations.																				

				lost, including approximately 2.1ha of medium sensitivity habitat, and approximately 13.5ha of low sensitivity.	
				2.1.3 The Technical Memorandum dated 25 October 2024 as compiled by Scientific Terrestrial Services (Pty) Ltd, indicates the following vegetation communities are present on the proposed site: - High sensitivity areas: 7.14ha; - Medium sensitivity areas: 2.23ha; and - Low sensitivity areas: 9.05ha.	The NEMA definition of indigenous vegetation: "Indigenous vegetation: refers to vegetation consisting of indigenous plant species occurring naturally in an area, regardless of the level of alien infestation and where the topsoil has not been lawfully disturbed during the preceding 10 years". Given the NEMA definition of indigenous vegetation, it must be noted that the hectares lost as a result of clearing activities will not necessarily match the extent of the hectares to be offset. The entire area to be cleared will likely be indigenous vegetation (no lawful topsoil removal); however, the areas to be offset only include medium and high sensitivity areas. Therefore, the remaining areas (low sensitivity) will result in a larger area of indigenous vegetation to be cleared. The Biodiversity specialist also excluded areas from the low sensitivity calculations that have been disturbed. Therefore, the indigenous vegetation loss (ha) will not necessarily equate to the calculations in the offset assessment. To further explain the discrepancy between the ha of sensitive vegetation in the Biodiversity Offset Report (STS) vs The Biodiversity Assessment (Helme), please see below snips. In the top snip STS had to extend the high sensitivity area to accommodate for the layout. The high sensitivity area as indicated in the STS report was therefore based on the development footprint. In the second snip it can be that the sensitive areas provided by the Helme didn't align (there were gaps between the layers), which STS corrected in their assessment. 
					
				2.1.4 The draft BAR, Terrestrial Biodiversity Impact Assessment Report and Technical Memorandum do not correlate regarding the extent of vegetation habitats present on the proposed site	This has been amended and correlate now. Please refer to point 2.1.1 for the explanation.
				2.1.5 Please ensure that the BAR reflects the correct extent of indigenous vegetation proposed to be cleared. Further, the Offset Report and project description in the BAR must clearly reflect the total extent of Cape Flats Dune Strandveld vegetation to be cleared.	The final BAR as well as the Offset Report has been amended to reflect the correct extent of indigenous vegetation proposed to be cleared.
				2.1.6 Further, since an offset is proposed to mitigate for the loss of endangered Cape Flats Dune Strandveld, the details of the proposed offset must be included as part of the project description.	The details of the Biodiversity Offset has been added to the project description.
				2.2 <u>Applicable listed activities:</u>	Correct.
				2.2.1 According to the draft BAR, a biogas waste to energy facility forms part of the proposed development.	
				2.2.2 It is noted that Activity 34 of Listing Notice 1 of the Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) was authorised in the Environmental Authorisation referenced "16/3/1/A3/39/2078/14" issued on 07 July 2016.	Correct.
				2.2.3 Since the proposed biogas facility was not authorised in the Environmental Authorisation issued on 07 July 2016, please advise whether Activity 34 of Listing Notice 1 of the EIA Regulations, 2014 (as amended) is triggered by the proposed biogas facility.	Not applicable. The proposed changes to the WWTW will not result in the need for a permit or a licence governing the release of emissions or pollution as per the Listed Activity 34. 10 MW is under the triggered threshold.
				2.2.4 Should Activity 34 of Listing Notice 1 be triggered, an updated application form, which contains all the applicable listed activities, must be submitted with the final BAR.	Activity 34 is not applicable.
				2.2.5 An indication on the estimated electricity to be generated from the proposed biogas facility, should also be provided.	The estimated electricity generated will be in the range of 1.3 MW to 3.9 MW.
				2.2.6 Please advise whether Activities 14 and 51 of Listing Notice 1 are applicable to the proposed biogas facility. If any of these listed activities are applicable to the proposal, please ensure that the impacts are assessed in the BAR and the Environmental Management Programme ("EMP") is updated accordingly.	Activities 14 and 51 relating to the biogas facility and specifically the storage and handling of a dangerous good are not applicable to the proposed expansion. According to the EIA Regulations 2014 (as amended) a dangerous good is defined as follows: "dangerous goods" means goods containing any of the substances as contemplated in South African National Standard No. 10234, supplement 2008 1:00; designated "List of classification and labelling of chemicals in accordance with the Globally Harmonized Systems (GHS)" published by Standards South Africa, and where the presence of such goods, regardless of quantity, in a blend or mixture, causes such blend or mixture to have one or more of the characteristics listed in the Hazard Statements in section 4.2.3, namely physical hazards, health hazards or environmental hazards. SANS 10234 list "Methane, compressed" as a dangerous good – see screenshot below.

[illegible]

				2.3.7 Figure 6 on page 16 of the Technical Memorandum indicates: "vegetation types associated with the candidate offset site options 1, 2, 6 and 6". Please ensure that this is corrected 2.3.8 Furthermore, the co-ordinates and SG 21-digit codes of the respective offset sites must be included in the final BAR. 2.3.9 Whilst it is indicated that Offset Site 8 will potentially be declared as a Nature Reserve, there is no indication as to how Offset Sites 1 and 7 will be secured. Please ensure that this is reported on in the BAR and Biodiversity Offset Report. 2.3.10 Further, a more detailed explanation on how the mitigation hierarchy has been applied to arrive at the best practicable environmental option (page 75 of the draft BAR), must be included in the BAR. 2.3.11 The Directorate notes that the Biodiversity Management Branch (BMB) of the City of Cape Town supports the offset specialist's recommendation regarding the three preferred offset sites. 2.3.12 Although a confirmation letter of support was provided by the City of Cape Town's BMB, a copy of the signed agreement between the applicant (City of Cape Town's Water and Sanitation Department) and the City of Cape Town's Environmental Resource Management Department (representing the City of Cape Town's BMB) must be included in the final BAR to indicate who will implement the biodiversity offset on the applicant's behalf. 2.3.13 The Directorate further notes that comments have been obtained from CapeNature in support of the proposed offset. This has been corrected, please refer to figure 6 of the Biodiversity offset report. Noted, please refer to page 25 of the BAR for the SG 21-digit codes of the respective offset sites Options 1 and 7 are COCOT owned land, as mentioned in section 5.2.1 and Section 12 of the Biodiversity offset report. A detailed explanation has been provided under point 8 (p79) of the BAR. Thank you for the acknowledgement. The offset agreement has been appended to the Biodiversity offset report as Appendix G.8.4. Correct. The comments from CapeNature have been addressed and included in the comments and responses report. 2.3.14 Please ensure that the Curriculum Vitae of the specialist who compiled the Technical Memorandum (Biodiversity Offset Report) is appended to the final Biodiversity Offset Report. 2.4 Heritage Impacts 2.4.1 It is understood that new roads are proposed as part of this proposal. Please ensure existing roads are used as far as possible. 2.4.2 A Heritage Impact Assessment was conducted and the Heritage specialist has recommended that the gravel road from the entrance to the coast must be placed adjacent to the edge of the facility to avoid fragmentation of the dune landscape. According to the BAR, the appointed engineers have taken this recommendation into account and amended on the layout and the EMP. 2.4.3 Please ensure that a final comment is obtained from Heritage Western Cape regarding the Heritage Impact Assessment Report dated 11 September 2024, as compiled by ASHA Consulting (Pty) Ltd, and the Paleontological Impact Assessment Report dated March 2024, compiled by Dr Graham Avery. 2.4.4 All comments obtained from Heritage Western Cape, must be addressed prior to the submission of the final BAR. 2.5 Please ensure that the co-ordinates for Erven 1205, 703 and 708, respectively, are provided 2.6 Public Participation Process 2.6.1 Please provide proof of the Public Participation Process being conducted for the draft BAR circulated as part of the application phase. This will include (but is not limited to): Noted. The Curriculum Vitae of the specialist has been appended to Biodiversity Offset Report as Appendix H. Existing roads will be used as far as possible. Confirmed. The Engineers has taken this recommendation into account. The HIA was submitted to HWC directly after closure of the PPP (29 November). The final comment will be addressed as soon as it becomes available. Please note that the only comment pertaining to Heritage was submitted by the CCT and the Heritage section had no objection. The HIA was submitted to HWC directly after closure of the PPP (29 November). The final comment will be addressed as soon as it becomes available. Please note that the only comment pertaining to Heritage was submitted by the CCT and the Heritage section had no objection. Please refer to Annexure F of the BAR. • Proof that a notice was placed on site and the date of placement; • Proof that an advertisement was placed in the local newspaper; • Proof that the adjacent landowners, ward councillor, local municipality and relevant State Departments/organs of state were notified; • Proof that the draft BAR was placed on the website of Zutari and at the Macassar Public Library; • Proof that the draft BAR was made available to registered IAPs; • A Comments and Responses Report, indicating all the comments received from IAPs on the draft BAR and the responses thereto; and • A complete list of registered IAPs 2.6.2 Please ensure that all comments are adequately addressed prior to the submission of the final BAR. Please refer to the CRR. 3. In accordance with Regulation 19(1) of the EIA Regulations, 2014 (as amended), the final BAR must be submitted within 30 days of receipt of the application by the Department, i.e. the final BAR must be submitted on or before 12 December 2024. If, however, significant changes have been made or significant new information has been added to the BAR, the applicant/EAP must notify the Department that an additional 50 days (i.e. 140 days from receipt of the application) would be required for the submission of the BAR. The additional 50 days must include a minimum 30-day commenting period to allow registered IAPs to comment on the revised report/additional information. Further note, in terms of Regulation 45 of the EIA Regulations, 2014 (as amended), an application in terms of the EIA Regulations, 2014 (as amended) lapses and the competent authority will deem the application as having lapsed, if the applicant fails to meet any of the timeframes Noted. Noted. Zutari notes that, an application in terms of the EIA Regulations, 2014 (as amended) lapses and the competent authority will deem the application as having lapsed, if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless extension has been granted in terms of Regulation 3(7). prescribed in terms of these Regulations, unless extension has been granted in terms of Regulation 3(7). 4. It is prohibited in terms of Section 24F of the National Environmental Management Act, 1998 (Act No. 107 of 1998) for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of the activity. A person convicted in terms of this prohibition is liable to a fine not exceeding R10 million or imprisonment for a period not exceeding ten years, or to both such fine and imprisonment. Kindly quote the abovementioned reference number in any future correspondence in respect of this application. Zutari and the Applicant is aware that it is prohibited in terms of Section 24F of the National Environmental Management Act, 1998 (Act No. 107 of 1998) for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of the activity. Noted.
8.1_20	Salim Haider	Department of Environmental	29/11/2024	29/11/2024

		Affairs and Development Planning, Western Cape Government Directorate: Waste Management	Dear Marianna Taljaard Thank you for the call earlier and possibly granting the department more time to comment. A number of recipients are no longer in the employ of the Department, or have moved into other positions. You can remove both Zayed Brown (retired) and Nicole Garcia (now at City of Cape Town) from the database. Etienne Roux has moved from Waste Management to Air Quality Management, but still in the Department. For Waste Management inputs, please ensure myself, Lance McBain Charles, Eugene Pienaar and Shaun Arendse are copied in, as well as the Administration viz Alrien Vetman and Abdullah Suliman. Natasha Davis-Wolmarans is the Director: Pollution and Chemicals Management (and you can copy in Catherine Bill), and Joy Leaner Director: Air Quality Management (and copy in Etienne Roux), for comments in their respective units. Natasha/Joy/Etienne, you can nominate others for support. It would be appreciated if we could have until Wednesday, 4 December 2024 to provide inputs, as many of the staff that should comment did not receive this previously. Kind regards Saliem Haider Director: Waste Management Directorate: Waste Management Department of Environmental Affairs and Development Planning Western Cape Government 5th Floor, Property Centre, 1 Dorp Street, Cape Town, 8000 Website: www.westerncape.gov.za/eadp 	Dear Saliem Thank you for your email. We'll make the changes accordingly. We understand the situation and appreciate your efforts to gather the necessary inputs. It is perfectly fine to provide the inputs by Wednesday, 4 December 2024. Please note that the attached documents have been provided for your reference. Kind Regards Marianna Taljaard    
			29/11/2024 Thank you Marianna. Much appreciated. Kind regards Saliem Haider Director: Waste Management Directorate: Waste Management Department of Environmental Affairs and Development Planning Western Cape Government 5th Floor, Property Centre, 1 Dorp Street, Cape Town, 8000 Website: www.westerncape.gov.za/eadp 	
8.1_21	Etienne Roux	Department of Environmental Affairs and Development Planning Air Quality Regulatory Services	29/11/2024 Good day Kindly find attached our comments on the above mentioned project. Kindly confirm receipt of this email. Thank you. Regards,	09/12/2024 Dear Mr Etienne Roux, Please see attached correspondence pertaining to your letter dated 29 November 2024. Kind regards Corlie Steyn

Etienne Roux Reg. EAP (EAPASA_2021/4080) Control Environmental Officer:
Air Quality Regulatory Services
Directorate: Air Quality Management
Department: Environmental Affairs and Development Planning



Department of Environmental Affairs and Development Planning
Palesa Mthibwa
Directorate: Air Quality Management
Palesa.Mthibwa@westerncape.gov.za | Tel: 021 483 2880

REFERENCE: 19/4/4/1/BC5/H- Macassar WWTW

ENQUIRIES: Palesa Mthibwa/Etienne Roux

For Attention: Ms Corlie Steyn

Zutari (Pty) Ltd
PO Box 509
GEORGE
6530

Tel: 044 873 5400
Email: PPP@a.dorj.com

COMMENT ON THE THE BASIC ASSESSMENT REPORT (BAR) AND CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (CEMP) FOR THE PROPOSED CAPACITY EXTENSION AND ASSOCIATED INFRASTRUCTURE REFURBISHMENT AT MACASSAR WASTEWATER TREATMENT WORKS (WWTW), WESTERN CAPE

The above-mentioned documentation, as received on 15 October 2024 by the Department of Environmental Affairs and Development Planning (DEA&DP), Directorate: Air Quality Management (D: AQM), has reference:

The Directorate has reviewed the documentation and has the following comments in terms of the National Environmental Management: Air Quality Act No. 39 of 2004 (NEM: AQQA):

1. DUST CONTROL MANAGEMENT

- 1.1. Dust generated from all the phases of the proposed activities must comply with the NEM: AQQA, National Dust Control Regulations (Government Notice No. R. 827) of 1 November 2013.
 - 1.1.1. These regulations prohibit a person from conducting any activity in such a way as to give rise to dust in such quantities and concentrations that the dust, or dust fallout, has a detrimental effect on the environment, including human health.
- 1.2. It is noted that dust generation is anticipated on site during the construction phase of the proposed project.
- 1.3. D: AQM recommends that:
 - 1.3.1. Dust suppression measures to monitor and control fugitive dust must be implemented and included in the CEMP and;



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Cape Town
8000
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9 December 2024

Mr Etienne Roux
Directorate: Air Quality Management
Department of Environmental Affairs and Development Planning
Email: etienne.roux@westerncape.gov.za

Dear Mr Etienne Roux

RE: Comment on the Basic Assessment Report (Bar) and Construction Environmental Management Plan (CEMP) for the Proposed Capacity Extension and Associated Infrastructure Refurbishment at Macassar Wastewater Treatment Works (WWTW), Western Cape

Your email and letter dated 29 November has reference.

Thank you for making the time to raise comments during the public participation process for the extension and refurbishment of the Macassar Wastewater Treatment Works (WWTW) on behalf of the Air Quality Management Department. Zutari has reviewed all the comments in depth and provide the following comments which were raised in terms of the National Environmental Management: Air Quality Act No. 39 of 2004 (NEM: AQQA):

1. Dust Control Management

Reference to Paragraph 1.3.1:
"Dust suppression measures to monitor and control fugitive dust must be implemented and included in the CEMP and;"

The following is included in the EMP: Section 3.29 - Dust and Odour Management: "A site specific Dust Management Plan (DMP) must be developed and implemented in accordance with Section 26 (3) of the CCT's Air Quality Management By-Law, PG 7662 of 17 August 2016, as amended..."

The Odour and Dust Management Plans must be circulated for comments to Commenting Authorities (CCT and DEA&DP) and must be approved before commencement of the project."

Reference to Paragraph 1.3.2:
"wind conditions be considered prior to the commencement of daily construction activities, and for activities that could lead to excessive dust to be suspended during periods of high wind speeds."

The following is included in the EMP: Section 3.29 - Dust and Odour Management: "Wind conditions be considered prior to the commencement of daily construction activities, and for activities that could lead to excessive dust to be suspended during periods of high wind speeds. Land clearing and earthmoving activities should not be undertaken during strong winds, where possible."

Zutari (Pty) Ltd | Reg No 1977/00371107 | Board of Directors (JGJ2024) "NM Gougeon (Chairperson), T Diale, "AC Dhebe, "YJ Hendricks, TB Mergo, "NEA Molele, J Ndaba, "GT Ndaba (Non-Executive Director)



1.3.2. wind conditions be considered prior to the commencement of daily construction activities, and for activities that could lead to excessive dust to be suspended during periods of high wind speeds.

2. NOISE CONTROL MANAGEMENT

- 2.1. Noise generated on site from the proposed activities must comply with the Western Cape Noise Control Regulations Provincial Notice 200/2013.
- 2.2. D-AQM notes that activities in the construction and operations phases could potentially generate noise.
- 2.3. D-AQM recommends that:
- 2.3.1. measures to monitor and prevent significant noise impacts should be included in, and adhered to strictly in the CEMP.

3. ODOUR MANAGEMENT

- 3.1. Due to the nature of the proposed development, an odour impact associated with various aspects of the project during the operations phase, could be anticipated.
- 3.2. It is noted an odour control system of the inlet and sludge dewatering system, which is included in the existing environmental authorisation, is planned to remain as part of the proposed amendments (page 75, point 5 in BAR).
- 3.2.1. D-AQM requests clarity regarding the details of the above-mentioned odour control system, and the control efficiency thereof.
- 3.2.2. D-AQM also recommends that all measures to mitigate the impact of odours be included in the CEMP.

4. GENERAL

- 4.1. Kindly be advised that the Air Quality Officer (AQO) in the City of Cape Town Metropolitan Municipality (CCT), Mr Ian Glidenhuys, must also be engaged regarding the proposed activity as it falls within their jurisdictional area. Mr Glidenhuys may be reached at 021 444 8364 or ian.Glidenhuys@capetown.gov.za.
- 4.2. The Department would like to draw the applicant's attention to Section 28 of the National Environmental Management Act No. 107 of 1998 (NEMA), i.e. "Duty of Care" which states that: "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorized by law or cannot reasonably be avoided or stopped, to minimize and rectify such pollution or degradation of the environment."

2. Noise Control Management

The Noise generated on site from the proposed activities will comply with the Western Cape Noise Control Regulations Provincial Notice 200/2013.

Paragraph 2.3.1:
"measures to monitor and prevent significant noise impacts should be included in, and adhered to strictly in the CEMP."

The following is included in the EMP, Section 3.25 - Noise Generation: "The Contractor shall limit noise levels. Noise-levels must comply with the relevant health and safety regulations and the provisions of SANS 1200A Clause 4.1 regarding "built-up areas". Noise should be monitored by the Health and Safety Officer, as appropriate.

Noise-generating construction activities should be restricted to normal construction working hours between 07h30 and 18h00 Monday's to Friday's. Should the Contractor need to do this work outside of the above times, he shall do so only with the approval of the Engineer, and the surrounding communities shall be informed prior to the work taking place."

In addition, as part of the proposed upgrade to the Macassar WWTW, select process units and process buildings are expected to generate noise during the operations phase of the project. However, the design engineers have taken necessary measures to ensure that noise generation is significantly reduced. Mechanical and Electrical Specifications have been prepared which outlines the requirements which the Contractor (under Contract 191Q/2023/24) will need to consider in order to address noise for process structures/buildings which may generate noise. The following key process structures/buildings listed below are anticipated to generate noise and have appropriate measures in place to address the noise (structures/buildings believed not to generate significant noise are not listed):

- a) Blower Building
- The blower speeds will not exceed 3600 rpm. Noise will be limited to below 81 dB(A) at a distance of 1m in any position in relation to the blower, as measured by an equivalent continuous A-weighted sound pressure level measurement device (SANS 10218-1).
 - Each blower discharge will be furnished with a stainless-steel silencer fitted after each expansion joint to recover dynamic pressure and reduce noise emission.
 - The air pipes shall be suitably sized to convey the maximum air volume necessary as specified and the velocity in the pipes shall not exceed 15 m/s at the maximum air flow rate to keep head losses to a minimum and to avoid excessive noise level and reduce the risk of vibrations from the pipe. All ducting shall include silencers to limit noise.
 - Performance testing of the blowers will include noise measurements.
- b) Ventilation Fans (Various Pump Stations and Buildings)
- Each fan will be provided with circular acoustic attenuators. One acoustic attenuator shall be mounted upstream, and one shall be mounted downstream. The downstream attenuator will reduce the noise exiting the building.
- c) Centralised Generator Building
- All generator louvers will be noise attenuating to 85 dB(A) at 7m away from the outside of the louver.

3. Odour Management

Reference to Paragraph 3.2.1:



- 4.3. Please note that the above-mentioned recommendations do not pre-empt the outcome of the application.
- 4.4. No information provided, views expressed and/or comments made by the DEA&DP, D: AQM should in any way be seen as an indication or confirmation:
- 4.4.1. That additional information or documents will not be requested;
- 4.4.2. or of the outcome of any application submitted to the authorities.
- 4.5. Kindly be informed that the D: AQM reserves the right to review the above-mentioned comments, should additional information come to light.

Please contact Ms Palesa Mofthiba (lpalesa.mofthiba@westerncape.gov.za) or Mr Etienne Roux (etienne.roux@westerncape.gov.za) should you have any further queries in this regard.

Please note that D: AQM has a dedicated email address reserved for all EIA related correspondences, DEADP.AQM@westerncape.gov.za. Kindly use this email for any future correspondence.

Yours faithfully,

Etienne Roux
Digitally signed by Etienne Roux
Date: 2024.11.29 13:04:42 +0200

Etienne Roux
Head of Component: Air Quality Regulatory Services

"AQM requests clarity regarding the details of the above-mentioned odour control system, and the control efficiency thereof."

As part of the proposed upgrade to the Macassar WWTW, select process structures/buildings are expected to produce odours during the operations phase of the project. However, the design engineers have taken necessary measures to ensure that these odours are managed and suitably treated. Mechanical and Electrical Specifications have been prepared which outlines the requirements which the Contractor (under Contract 191Q/2023/24) will need to consider in order to address odour for process structures/buildings which may generate odour. The following key process structures/buildings listed below are anticipated to generate odour and have appropriate systems in place to address the odour (structures/buildings believed not to generate significant odour are not listed):

- a) **Odour Control System (Inlet Works and Sludge Stream Structures)**
- All sumps and channels that are not covered by concrete slabs will be covered with GRP panel covers (with portions removable). The covers will have a rigid continuous rubber seal between panels and foul air will then be extracted from the channels through piping and taken to an odour control system for treatment.
 - Each of the screenings and grit collection skip dollies at the inlet works will be covered with GRP hoods. Foul air will be extracted from the hoods and treated with the air extracted from the inlet works channels.
 - The odour control system will incorporate biological treatment technology that is capable of treating and neutralizing odours generated at the inlet works and sludge stream structures. The equipment shall be designed to oxidise odorous compounds from the continuous flow of contaminated air. If the inlet H₂S (Hydrogen Sulphide) concentration is greater or equal to 20 part per million by volume (ppmv) the equipment will be designed to remove 99 % of hydrogen sulphide entering the system or better. If the inlet H₂S concentration is less or equal to 20 ppmv the outlet H₂S concentration must be less or equal to 0.1 ppmv. The treated gas will be transferred to a stack and be released to atmosphere, the stack will be at least 3m high.
 - In addition, the appointed Mechanical & Electrical contractor will be required to employ a specialist air dispersion consultant to model the odour release from the entire Macassar WWTW site and the dispersion of the odour release across the entire site and surrounding urban areas. The odour study will also incorporate the study of odour sources at the site to facilitate the design of the bio-trickling filter.
- b) **Odour Control System (Dewatering Building)**
- The biological treatment technology (odour control unit) will incorporate either a biofilter, biotrickling filter or a hybrid system (including a combination of biotrickling filter and biofilter system).
 - Odorous air will be conveyed via ducting from the various belt presses and linear screens and combine in a manifold. Odorous air from this manifold will then be conveyed to the odour treatment unit where treatment will take place.
 - The equipment will be designed to oxidise odorous compounds from the continuous flow of contaminated air. The equipment shall be designed to remove 99% of hydrogen sulphide entering the system for inlet H₂S concentrations of 20 ppmv or greater or H₂S outlet concentration of 0.5 ppmv or less for inlet H₂S concentrations below 20 ppmv; and 85% of other reduced sulphur organic compounds. The treated gas will be transferred to a stack and released to the atmosphere.

Reference to Paragraph 3.2.2:
"AQM also recommends that all measures to mitigate the impact of odours be included in the CEMP."



				ZUTARI The following is included in the EMP, Section 3.29 - Dust and Odour Management: "An Odour Management Plan must be developed in terms of with Section 35 (2) of NEMA:QA 39, 2004 as amended and shall be implemented to ensure that complaints are registered due to odour nuisances. The Odour and Dust Management Plans must be circulated for comments to Commenting Authorities (CCT and DEA&DP) and must be approved before commencement of the project." Kindly note that Zutari has added Mr Ian Glidenhuys to the database for this project. Kind regards  Corlie Steyn Senior Environmental Practitioner Project number 1001780, Letter to DE&DP, Air Quality, 22/04/2024, document for Quality, Final Review, 2024/12/04, Rev 0
8.1_22. 1	Lauren King	City of Cape Town: Consolidated Feedback	29/11/2024 Dear Corlie, I trust you are well. Please find attached consolidated comment and annexures from the City of Cape Town on the above application. Please note that the consolidated comment is a summary of the comments provided by the relevant line departments, but the full and detailed comments of the various line departments (attached as Annexures A.1-G) must also be read and taken into account when responding to comment provided by the City. Please acknowledge receipt of the attached comment via email for record keeping purposes. Kind regards, Lauren King Senior Professional Officer: Environmental & Heritage Management – Eastern Region Environmental Management, Spatial Planning & Environment	29/11/2024 Dear Lauren, Zutari acknowledges the receipt of the consolidated comments and annexures from the City of Cape Town. Zutari note that it is a summary of all the relevant departments. The full and detailed comments will be read in conjunction to the various line departments and will be responded to. Kind regards Corlie Steyn



CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD

SPATIAL PLANNING AND ENVIRONMENT
ENVIRONMENTAL MANAGEMENT DEPARTMENT

Lauren King
Environmental & Heritage Management

T: 021 400 3034 / C: 072 253 3932
E: lauren.king@cityofcapetown.gov.za

2024-11-29

Zutari (Pty) Ltd
8 Voortrekker Road, corner of Ilike Pienaar Boulevard
Bellville
7535

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.: 16/3/31/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 Liacassar 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 (EiPR) 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 Bylingiro (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 (EiPR).

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 /Jacarar 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 / iema (Appendix G.8.2), dated 25/10/2024, compiled by Scientific Terrestrial Services (Pty) Ltd, directly to the consultants, i.e. Tutani, 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 / Jacarar 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, Llacassar (not Firgrove).
- Treated effluent from the Llacassar 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 Heidelberg Region, there is a major need for the upgrade and expansion of the Llacassar 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 (EMP)

- The EMP must include all mitigation measures put forth by the relevant specialists under the relevant sections of the EMP.
- 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 Llacassar 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 EMP, 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 EMP. 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 Bylingiro
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 – Lishka Jalim
Annexure F: Urban Planning and Design: Urban Design – Ruan Illi
Annexure G: Environmental Management Department: Biodiversity Management – Julia Wood

CC: Department of Environmental Affairs and Development Planning (DE&DP)
E-mail: geappleadmin@westerncape.gov.za

19/12/2024

Dear Lauren,

I hope you are doing well.

Please see attached the response of the project team on the consolidated comments raised by the City of Cape Town pertaining to the Draft Basic Assessment Report (BAR) Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment, Western Cape Province

Please note the main letter addresses all the comments and Appendix 1 – 3 those comments (as per department) that needed detailed answers. The Stormwater plan is part of Appendix 2.

We are aware that it is currently the moratorium period, but we need to make sure that these responses are available early in 2025.

Would you kindly distribute to all the relevant departments.

May you have a blessed festive season.

Kind regards

Corlie

				ZUTARI IMPACT. ENGINEERED. T +27 21 526 9400 E capetown@zutari.com A 1 Century City Drive Waterloo District Century City Cape Town South Africa P PO Box 404 Cape Town 8000 Durban: 04 204 zutari.com 19 December 2024 Me L King Spatial Planning and Environment Environmental Management Department Email: lauren.king@capetown.gov.za Dear Me King, RE: Draft Basic Assessment Report: Proposed Macassar Wastewater Treatment Works (WWTW) Capacity Expansion and Refurbishment of Associated Infrastructure on Erven 1205, 703 And 706, Macassar (DEA&DP Ref No.: 16/3/31/A3/39/2054/24) Your email and letter dated 29 November 2024 has reference. Thank you for making the time to raise comments during the public participation process for the extension and refurbishment of the Macassar Wastewater Treatment Works (WWTW) on behalf of the City of Cape Town (CCT) and for providing consolidated comments from each Department. Zutari has reviewed all the comments in depth and provide the following comments pertaining to each Department. It is noted that "in principle" support has been given subject to technical requirements and issues raised. Please note that the public participation process came to an end on 29 November 2024. The requirements and issued raised are therefore addressed and answered in the Comments and Response Report (CRR) as well as this letter which will be shared with all Interested and Affected Parties (I&APs) 1. Water and Sanitation: Technical Services – Chanee Johnson (Annexure A.1-A.2) The requirements from Water and Sanitation have been noted. Dealing with wayleaves, permissions and permits forms part of the tender documents and will be the responsibility of the contractor. The tender documents makes provision for the following: <i>"The Contractor shall be responsible for obtaining all of the necessary wayleaves, permissions or permits applicable to working near any existing services or other infrastructure on Site, and shall ensure that any wayleaves, permissions or permits obtained by the Employer's Agent prior to the award of the contract are transferred into the Contractor's name.</i> <i>The Contractor shall abide by any conditions imposed by such wayleaves, permissions or permits.</i> <i>The Contractor shall ensure that all wayleaves, permissions and permits are kept on site and are available for inspection by the relevant service authorities on demand.</i> <i>The Contractor shall also ensure that any wayleaves in respect of electricity services are renewed timeously every three months."</i> The design has considered the services mentioned, however, it is worth noting that the bulk pipeline which comes from the Macassar Bulk Sewer Pump station does not traverse the site as indicated on the layout (going through existing Maturation Ponds and Settling Tanks) as the pipeline feeds the inlet works (i.e., the head of the works). In addition to dealing with services, a ground penetration survey was undertaken to identify any other services on the wastewater treatment works which was not shown on available as-builts, this information was overlayed onto the as-built services drawing and Zutari (Pty) Ltd Reg No 1671030171027 Board of Directors (DT2024): Nkomo (Chairperson), T. Dlamini, M.C. Dlamini, P.J. Hendricks, T.B. Mhango, N.E. Mkhize, J. Ndlovu, G.T. Ndlovu (Non-Executive Director) 
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				 ZUTARI forms the basis of the 'existing services layout' which was issued as part of the tender pack. Sewer and other infrastructure traversing the site has been taken into consideration and where applicable caution will be exercised when working close to live services, they will be protected where required throughout the duration of the proposed development. The following requirements have also been added the Environmental Management Programme (EMPr). • The applicant must apply for the required wayleaves before construction commences. • The relocation or positions of new water and sewer reticulation the Regional Reticulation officials. • Non-potable water must be used for onsite irrigation. 2. Urban Mobility: Integrated Transport Planning: Transport Impact Assessment and Development Control – Bill Jones (Annexure B) It is noted that the Department: Transport has no comments pertaining to the proposed Upgrade and Extension of the Macassar WWTW. 3. Urban Waste Management: Integrated Planning and Waste Strategy – Anela Kondlo and Jo-Anne Petersen The following comments have been noted and the EMPr has been amended accordingly: 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 has been noted that sludge may no longer be disposed of at landfill sites. Please note that the writeup for the disposal of sludge has been amended in the EMPr to reflect the concerns raised. This has been corrected from: "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" to: <i>"Sludge from the existing sludge lagoons will be tested to confirm the sludge classification (in terms of microbiological class, stability class and pollutant class) which will inform the beneficial management options available. As the current Macassar WWTW receives primarily domestic wastewater (with a small percentage from commercial businesses) and does not produce primary sludge, it is anticipated that the sludge classification will yield a result indicating the sludge is suitable for land use application or disposal at general landfill sites. If this is the case, sludge will be disposed of via vendors (currently contracted with the City of Cape Town and have a track record in sludge disposal) who deal in land use application. If the sludge classification yields results indicating the sludge is not suitable for land application or disposal at a general landfill site, then the contractor will need to dispose of the sludge at a licensed waste disposal facility, in this instance the contractor shall supply the Employer's Agent with a certificate of disposal..."</i> 4. Community Services and Health: Environmental Health – Claude Byilingiro (Annexure C) The support from Community Services and Health: Environmental Health is noted and that no concerns related to the proposed development and no objection has been raised. 5. Community Services and Health: Specialised Environmental Health Services, Air Quality Management – Rabelani Gundula (Annexure D) The support from Air Quality Management is noted and that the proposed development is desirable. Amendments to the EMPr has been made according to the Appendix 1 of this letter. 6. Economic Growth: Enterprise and Investment, Investment Facilitation – Lizelle Arendse It is noted that Economic Growth has no comments pertaining to the proposed Upgrade and Extension of the Macassar WWTW. 7. Urban Planning and Design: District Planning and Mechanisms – Mishka Jalim (Annexure E) The new District Plan has been quoted and the correct even has been referred to. Project number: 1001780, Letter to CCT_Final.docx, 2024/11/29, Rev 0 2 
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Your support of the project is noted.

9. **Energy: Electricity Generation and Distribution – Charise de Villiers**

The project site falls within an Eskom supplied area and it is noted that Electricity Generation and Distribution has no comment on the proposed development.

10. Environmental Management Department Biodiversity Management – Julia Wood
(Annexure G)

Please refer to Appendix 2 of this letter.

11. Environmental and Heritage Management: Heritage Section – Muneerah Solomon

The HIA and Palaeontological assessment has been submitted to Heritage Western Cape.

12. Environmental and Heritage Management: Environmental Section – Lauren King

All the comments have been noted. Please refer to Appendix 3 of this letter for feedback.

13. Environmental Management Programme (EMPr)

The EMPr does 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, will be submitted to the satisfaction of Biodiversity Management and Environmental and Heritage Management Branches prior to these works commencing, which will include 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.

The EMPr has been amended to include mitigation measures for the Operation Phase of the works, refer to Section 3.44 – Operational Mitigation. In addition, the EMPr has also been amended to allow for the management of alien species, refer to Section 3.4 – Alien Vegetation Management.

Kind regards

ggat

Corlie Steyn
Senior Environmental Practitioner

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Nr.	Comment	Response
		have severe penalties for any non-compliance. The EMPr makes it clear that contractors are not allowed to move outside of the designated work area and that severe penalties must be applied if this should be the case. Redundancy is critical in the design of a WWTW, since it prevents unplanned downtime of specific systems when one or more pieces of equipment is out of commission as a result of a failure. Equipment redundancy has been considered and catered for at all critical process units. However, in the event of unforeseen operational failures allowances at the inlet works has been made for redundancy and bypasses to avoid any overflow and flooding: - An emergency overflow from the inlet works common sump (located after the first set of lift screw pumps) to the emergency tank is allowed for in the design, in the event that the screening channels and/or the bypass screening channels are not operational or experiencing flows in excess of the Peak Wet Weather Flow. Sewage from the emergency tank will flow back to the inlet works should it be operational. A passive overflow will be provided from the emergency tank to the concrete lined maturation ponds. This will serve to relieve the inlet works equipment in the event that the initial emergency situation persists, and the emergency tank is at capacity. Sewage which makes it way to the ponds will also be pumped back to the inlet works once it is operational. - Another emergency overflow from the inlet chamber of the inlet works to the emergency ponds (concrete lined ponds) has been designed and will be used under extreme circumstances (in case the first set of lift screw pumps are not operational). Sewage from the ponds will then be pumped back to the inlet works once it is operational.
0	Is any deposition of sludge or emergency overflows earmarked for areas within the dunes or the river / estuary outside of the development foot print?	No, there is no deposition of sludge or emergency overflows planned for areas within the dunes or the river/estuary outside of the development footprint. The following is noted: - During the construction phases sludge will be cleared from the existing sludge

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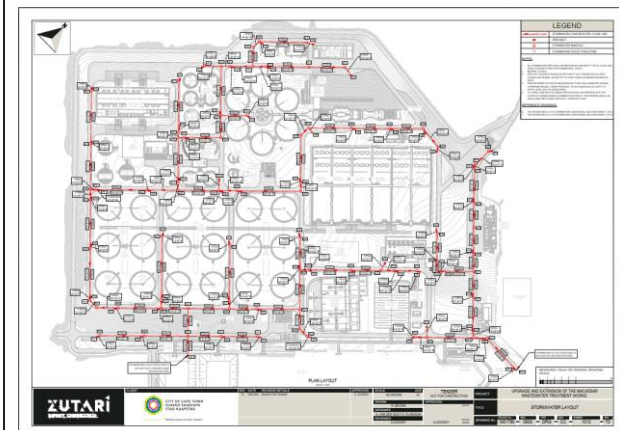
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Comment	Response
the proposed development. The recommendation of the freshwater specialist to further explore possibilities for the re-use of treated effluent in the area in future, in an effort to further reduce the volume of the discharge to the Eerste River, is strongly supported.	use at the Macassar WWTW and for off-site use. For onsite use, treated effluent is required for irrigation and service water for the operation and cleaning of some of the mechanical equipment and process units (inlet works, devatering building, general washing down). Treated effluent will and be pumped off site to downstream users. The off-site requirement was derived from the 2021 report "Treated Effluent Strategy and Masterplan for Non-Potable Reuse in the City of Cape Town" and was capped at a summer re-use demand of 18.3 Ml/d. It is estimated that the offsite requirements will equate to 18.3 Ml/d.
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.	From an ecological perspective, maintaining connectivity between the area outside the WWTW expansion footprint and the adjacent conservation area is preferable, as this land will serve as an offset. Allowing for an open landscape would support ecological processes and species movement. As the CoCT manages both the existing conservation area and the offset, unified management across a contiguous open area would enhance the effectiveness and efficacy of conservation efforts.





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MEMORANDUM

DEPARTMENT: TECHNICAL SERVICES

DIRECTORATE: WATER AND SANITATION

Reference : 20241016_AA
Date : 2024/10/22
Attention : Lauren King
Email : lauren.king@capetown.gov.za

WATER AND SANITATION COMMENT FOR THE DRAFT BASIC ASSESSMENT REPORT : PROPOSED MACASSAR WASTEWATER TREATMENT WORKS, CAPACITY EXTENSION AND ASSOCIATED INFRASTRUCTURE REFURBISHMENT

Background

On 7 July 2016, the Department of Environmental Affairs and Development Planning granted the City of Cape Town an Environmental Authorisation (EA) for the proposed upgrade and expansion of the Macassar Wastewater Treatment Works (WWTW) and associated infrastructure. This approval was based on the need to maintain essential wastewater treatment services for the local community.

The applicant now seeks to amend the original design upgrade and apply for a revision of the previous Environmental Authorisation (EA). This report provides an overview of the existing water and sewer infrastructure in the area surrounding the proposed development.

The report provides an overview of the existing water and sewer infrastructure near the development.

Water Reticulation

Distribution Zone

The proposed development falls within the Macassar reservoir supply area.

Present Situation

Corporate GIS indicates no water mains within the vicinity of the proposed development.

See figure 1 for water reticulation layout.

Bulk Water

The GIS database indicates that there is no infrastructure under the control of the City of Cape Town's Bulk Water Branch within the immediate vicinity of the proposed development shown in the application.

Sewer Reticulation

Drainage Area

The proposed development falls within catchment Macassar Waste Water Treatment Works.

Present Situation

Corporate GIS database shows that there are two rising mains feeding into the Macassar WWTW: one of unknown diameter (from the Macassar Bulk Pump Station) and a 1 000 mm diameter rising main (from the Helderberg Coastal Pump Station). These pipelines are not expected to be affected by the proposed upgrades. Please refer to Figure 1 for the sewer reticulation layout.

See figure 1 for sewer reticulation layout.

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Making progress possible. Together.

Please refer to entry 8.1_22.1

Wastewater

The proposed development involves the expansion of the existing Macassar Wastewater Treatment Works. All sewage generated on site will be directed to the Macassar WWTW for treatment.

Conclusion

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.

Conditions

The Water and Sanitation Department can accommodate the proposed development provided the following conditions are met:

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

General Disclaimer

Information provided is based on best available data. The infrastructure as-built information referred to and used in the hydraulic models are based on the GIS asset records, while modelled pressures, flows, velocities, capacities and volumes are based on hydraulic models of current land use and demands. Where appropriate, future land use and demands are considered and the impact of a development compared to that currently planned for the same land and surroundings.

Yours Faithfully

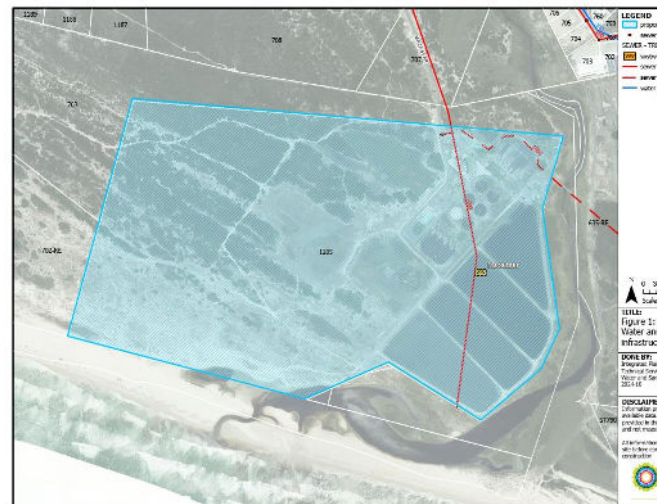
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On behalf of
Zolile Bashola

DIRECTOR: TECHNICAL SERVICES, WATER AND SANITATION DIRECTORATE

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Bill Jones
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Reference No:
Integrated Transport Planning Department
Transport Impact Assessment and Development Control
DATE / DATUM: 29 October 2024
TO / AAN: Environmental and Heritage Resources Management
ATT / AANDAG: Lauren King (City of Cape Town, Environmental Branch)

UPDATED DRAFT BASIC ASSESSMENT REPORT
MWWTW on Erf 1205, Macassar, whilst the effluent outlet overlaps on Erf 703, Firgrove and the proposed guard house be located on Erf 708.

Comments from Department Transport, based on details, specifications and information reflected on the Updated Draft Basic Assessment Report for the Macassar Wastewater Treatment Works (MWWTW), dated 28 October 2024, as well as the New Site Layout for the upgrade and extension of the Macassar Wastewater Treatment Works, Drawing No. 1001780 000-DKG-CC-0002-10, dated February 2024, both prepared by Zutari Impact Engineered are as follows:

The Department: Transport has no comments pertaining to the proposed Upgrade and Extension of the Macassar WWTW.

Yours faithfully

Bill Jones
Department: TIA & Development Control
Directorate: Transport

Municipal Offices **IsiGalekoMunicipal** **Municipal Kaniwe**
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Please refer to entry 8.1_22.1

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CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD

COMMUNITY SERVICES AND HEALTH
ENVIRONMENTAL HEALTH

Claude Alberlo Byllingiro
Environmental Health Practitioner
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Attention: Lauren King

05 November 2024

Re: Erf 1205, Macassar. Erven 703 & 708, Firgrove DBAR for Macassar WWTW Expansion.

Dear sir / Madam,

Your request for comments regarding the project of upgrading the Macassar WWTW refers. This department found no issue of concern and has no objection to the continuation of the work currently in progress.

Yours faithfully,

Claude Byllingiro
Environmental Health Practitioner

STRAND ADMINISTRATIVE BUILDING STRAND ADMINISTRATIEWE GEBOU
C/O FAGAN STREET & MAIN ROAD, STRAND
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Please refer to entry 8.1_22.1

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CITY OF CAPE TOWN
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14 November 2024

MEMORANDUM

Attention: Lauren King
Environmental Management Department
Spatial Planning & Environment Directorate

COMMENTS ON THE UPDATED DRAFT BASIC ASSESSMENT REPORT FOR THE MACASSAR WASTEWATER TREATMENT WORKS EXPANSION ON ERF 1205, MACASSAR, ERVEN 703 & 708, FIRGROVE, WESTERN CAPE

The Air Quality Management (AQM) Unit has scrutinised the updated **Draft Basic Assessment Report**, together with the attached Environmental Management Programme Report (EIPr) for the proposed expansion of the Macassar Wastewater Treatment Works (WWTW) ERF 1205, Macassar, Erven 703 & 708, Firgrove, Western Cape and wish to submit the following comments:

1. It is noted that the EIPr makes reference to the City of Cape Town Air Quality Management By-Law, 2010 and further noted that the EIPr has incorrectly referenced the section related to dust emissions. Please note that the 2010 By-Law has been repealed. The EIPr must be amended to reference the current By-Law to read as follows: City of Cape Town Air Quality Management By-Law, PG 7662 of 17 August 2016, as amended. The following sections of the By-Law must be endorsed in the EIPr:

- 1.1 Section 4: Duty of care (Reasonable measures to prevent air pollution);
- 1.2 Section 25: (Prohibition of emissions that cause nuisances); and
- 1.3 Section 26: (Dust Emissions);
- 1.4 Section 19: (Authorisation of open burning and burning of material)

2. Compliance with section 35 (2) of the National Environmental Management: Air Quality Act (NEMQA) 39 dated 2004 as amended – Chapter 4, Part 6: Measures in respect of offensive odours.

2.1 It is noted that the location of the proposed expansion is in close proximity to sensitive receptors and odour nuisances may arise during operation. In this regard a detailed Odour Management Plan must be developed and implemented to ensure that complaints registered due to the odour nuisance.

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246 VOORDEKKER ROAD, VASCO 7460
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Please refer to entry 8.1_22.1

3. Compliance with the provisions of the City of Cape Town Air Quality Management By-law (Provincial Gazette No. 7442 dated 17 August 2014) as amended:

3.1 The Final Environmental Management Programme (EiMP) must be amended to include a site specific Comprehensive Dust Management Plan (DMP). The DMP must be in accordance to **Section 24 (3)** of the said By-law to include at least the following:

- a) identify all possible sources of dust within the affected site;
- b) detail the best practicable measures to be undertaken to mitigate dust emissions;
- c) detail an implementation schedule;
- d) identify the person responsible for implementation of the measures;
- e) incorporate a dust fall monitoring plan; and
- f) establish a register for recording all complaints received by the persons regarding dust fall, and for recording follow up actions and responses to the complaints.

3.2 Installation and approval of fuel-burning equipment:

3.2.1 The EiMP suggests the facility's intention to install a steam boiler. Please note that applications for all Fuel Burning Equipment (FBE) must submitted via the City's e-Services portal for authorisation in terms of section 11 and 12 of said By-law, for prior approval.

3.2.2 The portal is now working and accessible at:
<https://eservices.capetown.gov.za/ri/portal>.

3.2.3 Below are the steps to guide applicants in completing the online application:

3.2.3.1 **Registration for City e-Services (if not already registered):**

- i. Visit the City of Cape Town website: www.capetown.gov.za.
- ii. Navigate to "City Connect."
- iii. Select "e-Services" and click on "Register here."
- iv. Complete all required fields, including your ID/passport number, and create a username.

3.2.3.2 **Next Steps:**

- i. You will receive an email with a temporary password within 48 hours.
- ii. Log in using the username you created and the temporary password.
- iii. Change the temporary password to one of your choice.
- iv. Complete the questionnaire and upload your identification documents.
- v. A confirmation email will be sent once your registration is complete.

3.2.3.3 **Final Steps:**

- i. Activate the "Environmental Health" service.
- ii. Your profile will be activated within approximately five hours, after which you may submit your application for the Fuel Burning Equipment Certificate of Authorisation via the e-Services portal.

3.2.3.4 **Mandatory Documents for Submission:** Please ensure that the following documents are attached to the FBE application:

- i. Approved Building Plans/Technical Drawings, and
- ii. Zoning Certificate.

3.3 **Important Note:** Applicants are advised to consult with Planning and Building Development Management to confirm whether building plans are required for the Boiler installation. In the absence of approved building plans, technical drawings must be submitted. Failure to provide the required building plans where applicable will result in delays in processing the application.

3.4 Applicants are advised to note the Case ID number, as it is essential for tracking whether the application has been received or not.

4. Compliance to the National Dust Control, Regulation 827 dated 01 November 2013 promulgated in terms of the National Environmental Management: Air Quality Act 39 of 2004 (NEM: AQA).

4.1 Please be advised that the AGO reserves the right to call for the implementation of dust fallout monitoring during all phases of construction of the project, in the event that it becomes evident that the dust nuisances are not effectively managed. The Dustfall Monitoring Programme may include the submission of monthly or quarterly dust fall reports.

4.2 The Dustfall monitoring reports, where required, must prove compliance with the prescribed dust fall rates as follows:

Table 1: Acceptable dust fall rates

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

(2) The method to be used for measuring dustfall rate and the guideline for locating sampling points shall be ASTM D1739: 1970, or equivalent method approved by any internationally recognized body.

4.3 The appointed Environmental Control Officer (ECO)/Responsible Person must ensure that the mitigation measures detailed in the final EIA/IR are implemented at during construction of the pipe line and operation thereof.

4.4 Please note that the National Dust Control Regulations R 827 dated 1 November 2013 are undergoing a review. Once the revised Regulations have been promulgated, the prescribed Dust Fall Standards and Methods of sampling and analysis will apply.

5. The Odour and Dust Management Plans must be circulated for comments to Commenting Authorities (City of Cape Town and DEA&DP) and must be approved before commencement of the project.

6. We note references to the Chlorine Gas disinfection building for the storage of chlorine gas tanks for disinfection purposes. As Chlorine is a highly toxic and reactive gas, we are concerned about the public health impact of emergency releases on the adjacent communities. The EIA/IR should therefore address emergency preparedness plans and technical methods to monitor chlorine gas leaks with alarms with the appropriate level of

			4 redundancies built in. Response plans should be drafted in the event of such emergency releases, in consultation with the City's Disaster / Management and Fire and Life Safety Units. 7. The Head: Specialised Environmental Health and/or City's Air Quality Officer reserves the right to call for additional information should it be deemed necessary in terms of the applicable legislative provisions regulating air quality matters. Ian Gildenhuis^{Digitally signed by Ian Gildenhuis} Date: 2024.11.14 16:18:20 +0200 Ian Gildenhuis Head: Specialised Environmental Health Services Air Quality Officer	
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CITY OF CAPE TOWN
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STAD KAAPSTAD

Mishka Jalim
Urban Planning and Design department
E: Mishka.Jalim@cape.gov.za
T: 071 441 9548

2024-11-06

ATTENTION:
Lauren King (Environmental Management Department, Helderberg District)

Revised Basic Assessment Report (BAR) for the proposed upgrade and expansion of the Macassar Waste Water Treatment Works located on Erf 1205, Macassar, and Erven 703 and 708, Macassar

1. Introduction

These are inputs from the District Planning and Mechanisms unit within the Urban Planning and Design Department.

The comments are with regards to the **Revised Basic Assessment Report (BAR) for the Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment which is located on Erf 1205, Macassar, and Erven 703 and 708, Macassar** (hereinafter referred to as 'the site').

The site is situated alongside the False Bay coastline in Macassar. The total extent of the site is approximately 62.92 Ha. The erven (Erf 1205, Macassar, and Erven 703 and 708, Macassar) that make up the study area are zoned for Utility and General Industrial purposes, respectively.

Erf 1205, Macassar gains access via Tie Road while erven 703 and 708, Macassar gain access via Macassar way. The upgrade of the site is concentrated to the eastern portion and within the existing parameters of the existing WWTW.

2. Comments

The comments below are given in accordance to the 2023 council approved spatial policies, the Municipal Spatial Development Framework (MSDF) and the Helderberg District Plan. In terms of the MSDF, erf 1205, Macassar fall within the critical natural assets (CNA) spatial transformation areas (STAs) while erven 703 and 708, Macassar fall within the incremental growth and consolidation area (IGCA). The IGCA designation **allows for appropriate development** subject to capacity of existing services. The MSDF states that "WWTW upgrade projects can include a capacity upgrade or a treatment process upgrade for existing treatment infrastructure, or both. All WWTW upgrade projects are implemented to (i) improve or maintain treated effluent quality and (ii) ensure sufficient treatment capacity for future growth." Therefore, this proposed WWTW is in line with the MSDF and IDP 2022 – 2027.

In terms of the Helderberg district plan, the site falls within the Macassar/ Vergenoegd Sub district. The sub district guidelines for the area elude to the residential growth currently being experienced in the area and within the District itself. There is a strong need to the upgrade to the existing waste water treatment works to cater for the existing demand and future demand based on applications received for developments within the area that feed to Macassar Waste Water Treatment Works. Both the MSDF and District Plans advocate for prioritised need for additional capacity at the waste water treatment works facilities to cater for urban growth.



Please refer to entry 8.1_22.1



Mishka Jalim
District Planning & Mechanisms
Spatial Planning and Urban Design Department

8.1_22.
7



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SPATIAL PLANNING AND ENVIRONMENT DIRECTORATE
URBAN PLANNING AND DESIGN DEPARTMENT
URBAN DESIGN BRANCH

Ruan Mills
Senior Professional Officer

T: 021 400 9407

E: Ruan.Mills@capetown.gov.za

DATE: 13 November 2024
TO: Environmental Management
ATTENTION: Lauren King
REFERENCE: Erf 1205, Macassar, including Erven 703 and 708, Firgrove.

URBAN DESIGN COMMENT ON DRAFT BASIC ASSESSMENT REPORT IN RESPECT OF PROPOSED UPGRADES AT THE MACASSAR WWTW ON ERF 1205, MACASSAR.

COMMENT

It should be noted there was no prior engagement with this branch, where initial comments could have been provided.

Notwithstanding the above, the Urban Design branch has no major concerns/ comments pertaining to the subject Draft Basic Assessment Report. As such the proposed upgrades at the Macassar WWTW facility is **supported** accordingly on the basis of the conditions and circumstances outlined in the motivation accompanying the application.

Ruan Mills

For: URBAN DESIGN BRANCH
Urban Planning and Design Department:
Spatial Planning and Environment Directorate.

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Please refer to entry 8.1_22.1



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SPATIAL PLANNING & ENVIRONMENT
ENVIRONMENTAL MANAGEMENT

Julia Wood
Manager: Biodiversity Management Branch

T: 021 444 1760 F: 021 444 3531 M: 0844649153
E: julia.wood@capetown.gov.za

Lauren King
Senior Professional Officer: Environmental & Heritage Management – Eastern Region
Environmental Management, Spatial Planning & Environment

12 November 2024

Biodiversity Management Branch comments on the Macassar Waste Water Works

The Biodiversity management Branch has the following concerns / comments of the proposed expansion of the Macassar Waste Water Treatment Works:

1. The proposed perimeter road on the northern boundary of the waste water treatment works falls within the existing Conservation Area on the site layout plan. This must be moved into the development footprint within Erf 1205.
2. The proposed perimeter road is proposed on a very steep dune at the northern most point. This will be extremely difficult to construct and result in a substantial impact on the natural vegetation and dune face in this area due to required cutting and stabilisation to accommodate the road. The road needs to be placed at the base of this dune to avoid this impact, including long term maintenance burden that could further impact on the adjacent nature reserve.
3. Within the development footprint, it appears that there will need to be extensive removal of the dunes to create a level surface for the development. How will this interface with the surrounding dunes and vegetation in the offset area and conservation area? The concern is that this would result in the need to cut back extensively into the dunes in the conservation area. This impact cannot be accommodated within the conservation footprint and the design needs to make allowance for the entire disturbance footprint to be accommodated within the developable footprint.
4. Where will the topsoil and search and rescue material of the CBA vegetation inside the development be move too?
5. Have all the edge effects originating from the planned development, inclusive of its operational phase, been considered? Where will any and all overflows (especially in the event of unforeseen operational failures) be directed?
6. Is any deposition of sludge or emergency overflows earmarked for areas within the dunes or the river / estuary outside of the development foot print?
7. What is the envisioned gradient of the road network and infrastructure after the proposed development, in other words, where will the low points be located within the development footprint? Can a diagram showing flow direction of discharge with at planned or potential exit point from the WWTW into the adjacent conservation area please be provided?
8. Where will effluent from the wash-down area be directed?
9. It appears that the perimeter road will be used as public access to the beach and river mouth. At the west most point, there will be a very strong desire line and people will walk directly across the dunes to the beach. How will this be mitigated?

BIODIVERSITY MANAGEMENT BRANCH: 1ST FLOOR, OLD ABATTOIR BUILDING, 53 BEEKLEY ROAD, MAITLAND 7505
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Please refer to entry 8.1_22.1

			2 10. Where will local residents and recreational users and visitors of the beach area and river mouth park? There is a significant existing desire line to the coast which will be altered. 11. What will the security infrastructure look like along the edge of the WWTW? How will the sense of place and scenic integrity of the area be maintained? Light pollution in to the conservation area can also have significant negative ecological impacts. Please note that the City is currently also working on a Conservation Framework for the area and it is imperative that internally processes align with the shared vision and desired long-term use of the area. 12. The New Site Layout plan (no. 0002-10) indicates fencing along the entire cadastral boundary of Erf 1205, in addition to the perimeter of the WWTW. This will transect the conservation area. Please can you provide clarity on the purpose and detail of this proposed installation? 13. The development layout at the southernmost part of the envisaged development is very close to the dynamic coastal zone and the mobile estuary mouth. This needs to be factored in and no stabilising of the mobile dunes or canalising of the river mouth would be supported. This is also relevant to the Bypass Effluent Channel. Please can you elaborate on how current and proposed infrastructure will interface with this sensitive area (inclusive of potential long term maintenance aspects). 14. Please can you clarify how the new Treated Effluent Outfall and canal will operate? Also where will this be constructed as there is very little space between the existing pans and the riparian embankment? 15. The current perimeter road will not allow public vehicles to access the lower reaches of the river mouth. This is a very popular area for bird watchers. Can the perimeter road be extended to end in a view point and small parking area at the most southerly point of the envisaged development? 16. The old pan areas are extensively used for cattle grazing at the moment. Once developed, this grazing will no longer be available. Have the owners of the cattle been engaged with? The loss of this grazing area will place additional grazing pressure on the neighbouring Nature Reserve. 17. Please can you quantify and indicate the footprint expansion of the new upgraded access road and bridge crossing over the Eerste River compared to the existing infrastructure? 18. Where will the construction camp be located during the construction phase? 19. It is imperative that all possible cumulative, edge effect and unforeseen collateral damage from the construction and operational phase of the sewage works be considered and mitigated. Any additional infrastructure (inclusive of additional pipelines or upgrades to accommodate increase raw sewage intake or treated effluent discharge or transfer) be included in the ecological impact assessment. Similarly, a detailed and site-specific method statement specific to the interface of construction activities with the surrounding conservation areas needs to be provided for approval by Biodiversity Management. This also aims to ensure timeous responses to unforeseen pollution incidents and adequate remedial actions. Yours sincerely Julia Wood Digitally signed by Julia Wood Date: 2024.11.14 16:17:27 +0200 Julia Wood Manager: Biodiversity Management Branch Maitland Environmental Management Department BIODIVERSITY MANAGEMENT BRANCH: 1ST FLOOR, OLD ABATTOIR BUILDING, 53 BERKELEY ROAD, MAITLAND 7565 P O BOX 11, MAITLAND 7404 www.capetown.gov.za Making progress possible. Together.	
8.1_23	Gavin Wurz		30/11/2024 Dear Corlie, My company , Erf 5100 Strand Pty Ltd, was the previous owner of farm Rouen (ERF 5100, 5101 Strand) . We now have an option to purchase on erf 5113 from COCT which we intend to exercise. I unfortunately missed the meeting on 22 November 2024. It would be much appreciated if you could send me as much info as possible and also keep me informed going forward. Regards, Gavin Wurz	02/12/2024 Dear Gavin, Thank you for your email. We've added you to our database for any future correspondence related to this project. The Draft Basic Assessment Report (BAR) and appendices can be accessed online at: https://www.zutari.com/macassar-wwtw-public-participation/ I've also attached the presentation used at the public meeting on 22 November 2024 for ease of reference. Please do not hesitate should you have any questions. Kind Regards Marianna Taljaard  Appendix 7_Macassar WWTW_PP Presentation_20241121.pdf 8 MB
8.1_24	Jayson Orton	ASHA Consulting	02/12/2024 Letter submitted to Stephanie-Anne Barnardt-Delpont at HWC by Jayson from ASHA Consulting:	03/12/2024 Hi Jayson Received, have added to HOMs agenda. Kind regards,



ASHA Consulting (Pty) Ltd
40 Brassie Street
Lakeside
7945

02 December 2024

Stephanie Barnardt
Heritage Western Cape
Protea Assurance Building
Greenmarket Square
Cape Town

RESULTS OF CONSULTATION: PROPOSED EXPANSION AND UPGRADE OF THE MACASSAR WASTEWATER TREATMENT WORKS, CITY OF CAPE TOWN, WESTERN CAPE

CASE: HWC231009035B1010

Dear Stephanie

This letter describes the consultation carried out for the above project and the relevant responses. City of Cape Town and Helderberg Renaissance Foundation were the two relevant bodies for the heritage aspects.

An integrated consultation process was carried out with the City of Cape Town Environmental and Heritage Management: Heritage Section being included in the overall Public Participation Process (PPP) carried out for the Basic Assessment Report. A consolidated response letter from all relevant CCT departments was issued with the heritage comment shown here (the full comment letter is appended):

Environmental and Heritage Management: Heritage Section – Muneerah Solomon

The Draft Basic Assessment Report (DBAR) correctly acknowledges that Section 38 (B) 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.

It was noted that the above comment only referred to the NID. This was an oversight and a follow up comment dealing with the HIA was submitted subsequently and reads as follows (see appended email):

ASHA Consulting (Pty) Ltd
Reg. no: 2013/220462/07 | Directors: Jayson Orlon & Carol Orlon
40 Brassie Street, Lakeside, 7945 | T: 021 788 1025 | C: 083 272 3225
jayson@asha-consulting.co.za | carol@asha-consulting.co.za | www.asha-consulting.co.za

Stephanie-Anne Barnardt-Delport
Specialist Heritage Officer (Archaeologist) (Professional ASAPA Member: 745)
Heritage Resource Management Services
Protea Assurance Building Greenmarket Square, Cape Town
Website: www.hwc.org.za / www.westerncape.gov.za

The Draft Basic Assessment Report (DBAR) for the proposed revision to the previously authorised expansion works of the Macassar Wastewater Treatment Works (WWTW) on Erf 1205, Macassar, as well as Erven 703 & 708, Rigaard, correctly acknowledges that section 38 (b) of the National Heritage Resources Act (Act 25 of 1999) is triggered. A NED application was therefore made to Heritage Western Cape (HWC). HWC has responded on 26/10/2023 that since there is reason to believe that the Proposed Wastewater Treatment Works on Erf 1205 Macassar and Erven 703 & 708, Rigaard will impact on heritage resources, HWC requires that a Heritage Impact Assessment (HIA) that satisfies the provisions of Section 38(3) of the NHRSA be submitted. This HIA must in addition have specific reference to the following:

- Palaeontological Impact Assessment

The Heritage Section of the Environment and Heritage Management (ESHM) Branch has no objection and supports the proposal and set of recommendations outlined in Section 10, Page 29 of the HIA as well as the recommendations outlined in the specific Palaeontological Assessment (Page 14 & 17) requested by HWC to ensure appropriate monitoring and management. It should further be noted that the process in the above regard is currently ongoing and the follow-up response from HWC is awaited.

The Helderberg Renaissance Foundation did not submit a comment. A follow-up telephone call to Mr Louis Steyn after the close of consultation revealed that they felt it was outside their scope of knowledge, and they were happy to allow it to pass with no formal comment from the Foundation.

Please note that emails from Zutari (the environmental practitioner) proving consultation have also been attached as documents 5d to 5i.

Yours sincerely


Jayson Orton

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40 Brasse Street, Lakeside, 7945 | T: 021 788 1025 | C: 083 272 3225
jayson@asha-consulting.co.za | carol@asha-consulting.co.za | www.asha-consulting.co.za

13/12/2024

Good day Jayson
Thank you for your submission to HWC regards to the above application.
Please see attached response for your records.
Any further questions, please reply to this email.
Kind regards,
Stephanie-Anne Barnardt-Delport
Specialist Heritage Officer (Archaeologist)
Heritage Western Cape
Heritage Resource Management Services
Protea Assurance Building Greenmarket Square, Cape Town
(Currently working remotely)

Our Ref: HM / CAPE TOWN METROPOLITAN / MACASSAR / FARM 703 & 1205
Case No: HWC230903581019
Enquiries: Stephanie Barnard
E-mail: Stephanie.Barnard@westerncape.gov.za
Tel: 021 829 3315



Heritage Consultant: Jayson Orton
ASHA Consulting
jayson@asha-consulting.co.za

RESPONSE TO HERITAGE IMPACT ASSESSMENT: DECISION
In terms of Section 38(4) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape Provincial Gazette 6061, Notice 298 of 2003

HERITAGE IMPACT ASSESSMENT: PROPOSED EXPANSION AND UPGRADE OF THE MACASSAR WASTEWATER TREATMENT WORKS, CAPE TOWN, SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)

The matter above has reference.
This matter was discussed at the Heritage Officer Committee (HOMs) held on 10 December 2024.

DECISION

The Committee has resolved to endorse the Heritage Impact Assessment (HIA) dated 11 September 2024, and prepared by ASHA Consulting, as having met the provisions of Section 38(3) of the National Heritage Resources Act (NHRA), with specific reference to the following recommendations on page 39:

1. The Fossil Chance Finds Procedure must be included in the EMP for the project;
2. A Workplan should be in place so that collection of fossils can commence immediately as and if required;
3. A palaeontologist must be contracted to monitor the excavation work on the WWTW site;
4. Disturbance of the dunes outside the project footprint must be minimised;
5. An archaeologist must be contracted to monitor the grubbing (with a focus on WWTW site and Paardevlei precinct);
6. A Workplan should be in place so that collection of artefacts can commence immediately as and if required;
7. A decision will need to be taken during the monitoring process as to whether enough material is present to warrant retention of a collection, as well as the analysis, curation and reporting of the finds;
8. At minimum a photographic record and description of the material and its context should be captured; and
9. If any fossils, archaeological material or human burials are uncovered during the course of development then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist (if not present on site at the time). Such heritage is the property of the state and may require excavation and curation in an approved institution.

HWC reserves the right to request additional information as required.
Should you have any further queries, please contact the official above and quote the case number.

- This decision is subject to an **appeal period of 14 working days**, kindly note that the appeal period is calculated from the date indicated on the HWC date stamp, which is the date the appeal is sent, and not the date of signature
- Appeals to HWC can be submitted to HWC.Appeals@westerncape.gov.za
- The applicant is required to inform any party who has expressed a bona fide interest in any heritage-related aspect of this record of decision. The appeal period shall be taken from the date above. It should be noted that for an appeal to be deemed valid it must refer to the decision, it must be submitted by the due date, and it must set out the grounds of the appeal. Appeals must be addressed to the official named above and it is the responsibility of the appellant to confirm that the appeal has been received within the appeal period.
- **Work may NOT be initiated during the 14-day appeal period.**
- If any archaeological material or evidence of burials is discovered during earth-moving activities all works must be stopped and Heritage Western Cape must be notified immediately.
- This approval does not exonerate the applicant from obtaining any necessary approval from any other applicable statutory authority.


Waseela Dhinanzy

Assistant Director: Professional Services

www.westerncape.gov.za/eng



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8.1_25

Portia Makitla

Dept. of
Forestry,
Fisheries & the
Environment

B&C:
Biodiversity
Mainstreaming
EIA

29/11/2024

Dear Portia,
I hope you are doing well.
Will you please send us your comment of the draft BAR as we are preparing to submit to the competent authority and the PPP closed today.
Kind regards
Corlie Steyn

03/12/2024

Dear Portia,
I hope you are doing well.
I refer to my email below.
Can you please provide us with your comment.
Kind regards
Corlie Steyn

03/12/2024

Good Morning Corlie,
Please see attached comments for your attention.

18/12/2024

Dear Portia,

Best Regards, 
Nompumelelo Lekalakala
B&C: Biodiversity Mainstreaming & EIA
Department of Forestry, Fisheries and the Environment
Environment House



Private Bag 3447, Pretoria, 0001; Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 389 8000; Fax: +27 86 625 1042
Reference: 16/3/31/A3/39/2054/24
Enquiries: Portia Makitla
Telephone: 012 399 9411 E-mail: pmakitla@dfpe.gov.za

Attn: Corlie Steyn
Zutari

Email Address: Corlie.Steyn@zutari.com

PER EMAIL

Dear Ms Steyn

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED MACASSAR WASTEWATER TREATMENT WORKS, CAPACITY EXTENSION AND ASSOCIATED INFRASTRUCTURE REFURBISHMENT, WESTERN CAPE PROVINCE

The Directorate: Biodiversity Conservation has reviewed and evaluated the reports.

The proposed development is for the upgrade and expansion of the existing Macassar Wastewater Treatment Works (WWTW) and associated infrastructure on the basis that they were necessary to continue to provide essential wastewater treatment services to the surrounding community on Erf No. 1205 Macassar, however, the effluent outlet overlaps on Erf No. 703 Firgrove, and the proposed guard house will be located on Erf 708.

During the site visit conducted on the 20th November 2024, it was noted through discussions and review that the EA was issued for the upgrade in 2016 and the EA has lapsed, therefore the proposed revision to the approved design upgrades will result in the clearance of approximately 2.4ha of vegetation within an Endangered Ecosystem (Cape Flats Dune Strandveld) as identified in the revised 2022 National List of Threatened Ecosystems.

The study area has been mapped as Critical Biodiversity Area (CBA) 1b due to the presence of protected species (*Sideroxylon inermis* (milkwood) and Species of Conservation Concern (SCC). About 6.8ha of high sensitivity habitat will be lost to the proposed development, along with about 2.1ha of medium sensitivity habitat, and the rest (about 13.5ha) will be of Low sensitivity.

To ensure the continued persistence of ecosystems and that national conservation targets are achieved, it is essential that impacts on sensitive and highly localised habitats are minimized or avoided altogether. Amongst others, please ensure that the following recommendations are considered and adhered to:

- Very highly sensitive habitats and their buffer zones near the development footprint must be avoided or demarcated as No-Go areas, and
- The 'no-go' areas of the development property must be clearly demarcated and excluded from the final layout plan.



The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and / or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

Please see attached the response of the project team on your comments raised pertaining to the Draft Basic Assessment Report (BAR) Macassar Wastewater Treatment

Works, Capacity Extension and Associated Infrastructure Refurbishment, Western Cape Province

Kind regards

Corlie Steyn



T +27 21 526 9400 E capetown@zutari.com
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P 101 New 404
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8000
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18 December 2024

Ms Portia Makitla
Department of Forestry Fisheries and the Environment
Email: PMakitla@dfpe.gov.za

Dear Ms Portia Makitla,

Re: Comments of the Draft Basic Assessment Report (BAR) Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment, Western Cape Province

Your email and letter dated 28 November 2024 refers.

Thank you for making the time to raise comments during the public participation process for the upgrade or the Macassar Wastewater Treatment works (WWTW) on behalf of Department of Forestry Fisheries and the Environment (DFPE).

Please see table below for responses to the comments.

Zutari (Pty) Ltd | Reg No: 1971002711017 | Board of Directors (BOD) (Chairperson): T. Dabala, "AC" Dabala, "PJ" Hendriks, T.B. Mergo, "NE" Mergo, J. Ndlovu, "GT" Ndlovu ("Non-Executive Director")



COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED MACASSAR WASTEWATER TREATMENT WORKS, CAPACITY EXTENSION AND ASSOCIATED INFRASTRUCTURE REFURBISHMENT, WESTERN CAPE PROVINCE

- A Search and Rescue Plan to remove and relocate protected species identified within the study area must be developed by a professional and qualified ecologist and submitted as part of the final report.
- Disturbed areas must be rehabilitated as soon as possible after construction with locally indigenous plants to enhance the conservation of existing natural vegetation on site.
- Prevent the further loss and fragmentation of vegetation communities and the high biodiversity areas in the vicinity of the study area.
- Maintain ecological processes at all scales and avoid or compensate for any effects of land uses on ecological processes.
- Care must be taken to avoid the re-introduction and spread of alien invasive species.
- Minimize land use types that reduce ecological resilience (ability to adapt to change), particularly at the level of water catchments.
- Implement land use and land management practices that are compatible with the natural potential of the area.
- Permit from relevant authorities must be obtained prior commencement of any construction activities for the disturbance or removal of any nationally or provincially protected species.

The Directorate has also noted the submission of the biodiversity proposal/memo due to the unavoidable high negative residual impact to an acceptable level. This leaves a biodiversity offset as the only way to try and reduce negative residual impacts. Biodiversity Offset Plan that comply with requirements of National Biodiversity Offset Guidelines must be submitted for comments as part of final report for review and approval.

The Biodiversity Offset Management Plan must be developed, in more detail, the management and implementation of the offset in terms of comprehensive land use management plans and spatial mapping of interventions within the selected offset sites, the vehicle used for long-term conservation, and monitoring requirements.

Three Offset Options 1, 7 and 8 were noted as the most suitable candidates for offset purposes. These options are considered favourable as they are located within key biodiversity areas, such as CBA habitat. Option 1 is located within the WWTW property thus negating the need for additional purchasing of property. Options 7 and 8 are both state-owned, making them ideal for long-term stewardship agreements. Appropriate offset ratios must align with the goal of achieving no net loss or a net gain in biodiversity.

The Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@offe.gov.za for the attention of Mr. Seoka Lekota.

The Directorate reserves the right to revise initial comments presented here if additional information becomes available.

Yours faithfully

[Signature]

Mr. Seoka Lekota
Control Biodiversity Officer Grade B: Biodiversity Conservation
Department of Forestry, Fisheries & the Environment
Date: 28/11/2024

Batho pele- putting people first

2

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ZUTARI

[illegible]

Project number 100180, Letter to OPFE, Final doco, 2024/12/18, Rev 2

ZUTARI

[illegible]

Kind regards,

Corie Staysn
Senior Environmental Practitioner

Preprint number 100185, Letter to [SPR](#), First date, 2024-12-18, Rev. 1

8.1 26

Lance Mcbain-Charles

Department of
Environmental
Affairs and

03/12/2024

19/12/2024

Development
Planning:
Directorate:
Waste
Management

Good day Mr./Ms. Corlie Steyn

Attached the correspondence associated with the "COMMENT ON THE BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADE AND EXTENSION OF THE MACASSAR WASTEWATER TREATMENT WORKS, ON ERF NO. 1205 MACASSAR, CAPE TOWN."

Regards

Lance McBain-Charles *Reg. EAP (EAPASA)(2019/1999)*

Control Environmental Officer (Grade B)

Head: Waste Management Licensing

Directorate: Waste Management

Department: Environmental Affairs and Development Planning

Website: www.westerncape.gov.za/eadp



Department of Environmental Affairs and Development Planning
Minenhle Mpitimpi
Waste Management Licensing
Minenhle.Mpitimpi@westerncape.gov.za

Reference: 19/2/5/3/A3/39/WL0244/24

Director/s
Zutari (Pty) Ltd.,
P.O. Box 509
GEORGE
6530

Email: Corlie.Steyn@zutari.com

For attention: I./r./ll. Corlie Steyn

COMMENT ON THE BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADE AND EXTENSION OF THE MACASSAR WASTEWATER TREATMENT WORKS, ON ERF NO. 1205 MACASSAR, CAPE TOWN.

1. The documentation dated April 2024, as received electronically by the Department of Environmental Affairs and Development Planning: Waste Management (hereafter, "the Department") on 29 November 2024, refers.
2. It is the understanding of this Department that the proponent proposes to upgrade the Macassar WWTW as per the project scope provided on page 5 of the draft BAR. The development was previously authorised in 2016; however, a new design alternative is being proposed.
3. The Department has reviewed the proposal. As per Government Notice No. 921 of 29 November 2013, please note that the waste management activity, Category B 4, relating to treatment of wastewater is not triggered due to the exclusion which reads, "The treatment of hazardous waste in excess of 1 ton per day calculated as a monthly average; using any form of treatment excluding the treatment of effluent, wastewater or sewage."
4. The Department generally supports the development as it's aware of the current sewage management issues experienced in the areas being serviced by the WWTW, particularly False Bay and Strand.
5. The Directorate notes that the waste generated by the proposed development may be both general and hazardous in nature. The trade waste streams must under no circumstance be mixed. Should this occur, the entire volume of waste will be classified as hazardous.
6. The waste generated must be efficiently managed in accordance with the waste hierarchy. It must be stressed that disposal must be seen as the last option. Waste must be disposed of in appropriately licensed disposal facilities.

Dear Lance and Minenhle,

Please see attached the response of the project team on your comments raised pertaining to the Draft Basic Assessment Report (BAR) Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment, Western Cape Province

Kind regards

Corlie Steyn



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Dunes: 021 204
zutari.com

19 December 2024

Ms Minenhle Mpitimpi
Department of Environmental Affairs and Development Planning: Waste Management Licensing
Email: Minenhle.Mpitimpi@westerncape.gov.za

Dear Ms Minenhle Mpitimpi

Re: Comments of the Draft Basic Assessment Report (BAR) Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment, Western Cape Province

Your email and letter dated 03 December 2024 refers.

Thank you for making the time to raise comments during the public participation process for the upgrade or the Macassar Wastewater Treatment works (WWTW) on behalf of Department of Environmental Affairs and Development Planning (DEA&DP).

Please see table below for responses to the comments.



COMMENTS RECEIVED AFTER PPP

8.1_27	Sibusiso Mbethe	Department of Forestry, Fisheries and the Environment: Directorate: Coastal Development & Coordination	02/11/2024 Good day Ms Steyn, I trust this email finds you well. Apologies we have missed the deadline. Can we kindly ask for your leniency to consider the attached comments? Enkosi Sibusiso Mbethe Specialised Environmental Officer & PSA Secretary Directorate: Coastal Development & Coordination Chief Directorate: Integrated Coastal Management Branch: Oceans and Coasts Website: www.dffe.gov.za  forestry, fisheries & the environment Department: Forestry, Fisheries and the Environment REPUBLIC OF SOUTH AFRICA Private Bag X 447, PRETORIA - 0001, Environment House 473 Steve Biko Road, Arcadia, PRETORIA DFFE Reference: ED/15-254/117 Enquiries: Sibusiso Mbethe Email: OCEIA@dffe.gov.za Telephone: (021) 493 7043 Ms Corlie Steyn Zutari (Pty) Ltd, P.O.Box 509, George, 6530 Tel: 044 805 5421 Email: corlie.steyn@zutari.com Dear Ms Steyn COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADE AND EXPANSION OF THE MACASSAR WASTEWATER TREATMENT WORKS (WWTW) AND ASSOCIATED INFRASTRUCTURE, MACASSAR, CITY OF CAPE TOWN. The Department of Forestry, Fisheries, and the Environment (DFFE); Branch Oceans & Coasts (O&C) appreciates the opportunity granted to provide comments and recommendations on the draft basic assessment report for the proposed upgrade and expansion of the Macassar Wastewater Treatment Works (WWTW) and associated infrastructure, Macassar, City of Cape Town. This Branch will provide comments based on the provisions of the National Environmental Management Act 107 of 1998 ("NEMA") and the National Environmental Management: Integrated Coastal Management Act 24 of 2008 ("ICM Act"). The Branch O&C is mandated to ensure the holistic management of the coast, estuarine areas, and maintenance of the seascapes to realise the development and use of natural resources in a sustainable fashion. The Branch further ensures that the ecological integrity, natural character, and economic, social, and aesthetic value of the coastal zone are maintained to protect people, properties, and economic activities against the impacts of dynamic coastal processes. Guided by the principles of integrated coastal management, this Branch promotes developments that promote socially justified sharing of benefits derived from a resource-rich coastal area and strives to ensure that the principles of sustainable development are upheld. Based on the submitted BAR, the Branch O&C presents the comments stipulated below for consideration. 1. It is rather unfortunate that in the application under Appendix E, a comment from the DEA: Oceans and Coast is noted as not applicable. The Branch O&C is <i>inter alia</i> tasked with the coordination and facilitation of the implementation of the ICM Act at a national level. The Branch O&C seeks to ensure an integrated management of the coastal zone in South Africa which is of paramount importance to achieve the constitutional commitment to improving the quality of life of all citizens while protecting the Page 1 of 3	19/12/2024 Dear Sibusiso, Please see attached the response of the project team on your comments raised pertaining to the Draft Basic Assessment Report (BAR) Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment, Western Cape Province Kind regards Corlie Steyn  T +27 21 526 9400 E csapeiren@zutari.com A 1 Century City Drive Waterford Precinct Century City Cape Town South Africa P.O. Box 404 Cape Town 8002 Dinner: 08:00 zutari.com 19 December 2024 Mr Sibusiso Mbethe Department of Forestry, Fisheries and the Environment: Oceans and Coast Email: OCEIA@dffe.gov.za Dear Mr Sibusiso Mbethe Re: Comments of the Draft Basic Assessment Report (BAR) Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment, Western Cape Province Your email and letter dated 02 December 2024 refers. Thank you for making the time to raise comments during the public participation process for the upgrade of the Macassar Wastewater Treatment works (WWTW) on behalf of Department of Forestry, Fisheries and the Environment (DFFE). <u>Please note that your comment was submitted after the closing date of the PPP.</u> Please see table below for responses to the comments. Zutari (Pty) Ltd Reg No 197703571107 Board of Directors (DT/2504) 'Nk Gengana (Chairperson), T Daka, 'AC Dicaula, 'PU Hardschick, 'Tb Merga, 'NCL Mober, 'J Nema, 'GT Randa (Non-Executive Director) 
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natural environment for the benefit of the present and future generations. The EAP must therefore ensure that the comments from the Branch O&C are often received.

2. It is of equal concern that the EAP has indicated that the ICM Act does not apply to the proposed Macassar WWTP activities. It is not clear on what grounds the ICM Act is not applicable, yet the proposed activities occur within the coastal zone, an area that is specifically regulated by the ICM Act as a specific environmental management Act listed as such under section 1 of the NEMA. If this was not the case, the comments from DEA&D Coastal Management could have not been sought and included in the PPP yet that section of DEA&D is a creature of the ICM Act.
3. The non-applicability professed under Coastal Environmental Management in the report falls squarely under the concerns raised in para 1 and 2 supra. The effluent from Macassar WWTP discharges at Erste River Estuary. This discharge has largely modified the natural function of the estuary, as a result, it is often open to the sea. It is of course not the only contributing factor as the Erste River is joined by Kulus River approximately 4 km upstream of the estuary. The Kulus River also receives effluent treatment from several WWTP, urban pollutants, runoff, etc. The take-home message however is that Macassar WWTP effluent discharge has a significant impact on the Erste River Estuary's natural estuarine characteristics. It also alleges that unplanned emergency overflow of untreated wastewater from the Macassar WWTP ended up in the Erste River Estuary, please see Chapter 23 of the Estuary Management Plans 2011 prepared by Coastal and Environmental Consultant for the government.

4. The Eerste River Estuary management vision was

"To manage the estuary and its catchment in such a manner as to reduce and minimize urban influence and pollutants on the estuary, where possible allow free and natural movement of the estuary mouth, manage alien invasive species, continuously work towards achieving high standards of water quality, recognize the estuary as an important nursery and biodiversity habitat and monitor the estuary in such a manner so as to intervene when urban influences have compromised the natural functioning of the estuary"

5. It is therefore a welcome move that the new proposed design for the refurbishment of the existing Macassar WWTW will achieve improved treatment and operations and consequently improve the effluent discharged into the estuary thus improving water quality. It is, however, unclear how the increased discharge volume would impact the estuary. This concern has been shared in the specialist study too. It seems plausible and ideal that the volume is reduced and the recommendations that the treated wastewater must be re-used in canal.
6. Large areas of vegetation will be cleared. It is hereby recommended that during construction and operations, silt trapping must be adopted and rehabilitation should occur after construction. Many parts of the road infrastructure in this area are often covered by sand due to mobile dune movement. Approximately 1 to 2 million tonnes of sediments are transported past the South African coastline at any given time either east or west coast each year due to south-westerly swell and that results in a net-littoral drift. It is therefore important to trap the sand so that it doesn't cause problems in other areas.
7. The ICN Act engages us to consider Integrated Coastal management as an evolving process that learns from past experiences so at the end, we can achieve conservation of the coastal zone and sustainable use. It is acknowledged that the initial EA was approved in 2016. The Macassar WWTW was constructed in a flood plain, it is also seaward of the line delineated by the City of Cape Town, and the results of the studies dictate that the Macassar WWTW will within the 1,50 years flood line. It seems therefore that it is

Comments on the draft basic assessment report for the proposed upgrade and expansion of the Macassar Wastewater Treatment Works (WWTW) and associated infrastructure, Macassar, City of Cape Town

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Received: 12 October 2016; Accepted: 12 February 2017; Published: 14 February 2017

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undesirable to have such a large infrastructure in the area Macassar WWTW is in. In case of flooding, how will the overflow of untreated wastewater be managed?

8. Section 69 of the ICM Act stipulates that no person may discharge effluent that originates from a source on land into coastal waters except in terms of a general discharge authorization or a coastal waters discharge permit issued by the Minister. Therefore, the applicant should liaise with the Branch via CWDP@dfpe.gov.za to ascertain whether the effluent discharge permits in terms of the ICM Act would be required or not.
9. It should further be noted that the use of vehicles in the coastal areas is prohibited in South Africa. The applicant in the BAR is however an organ of state which will be covered under regulation 3(1)(d) of the Control of Use of Vehicles in the Coastal Area Regulations published in GN R. 496 of 27 June 2014.
10. The location for the proposed WWTW upgrade and expansion is adjacent to the estuary and the discharge of the treated effluent will be on the estuary, however, the Estuarine Impact Assessment was not conducted to assess the present ecological health/integrity and conservation/ecosystem services value of the study area that will be affected by the proposed development with due consideration of the following impact on river hydraulics, the flow and channel characteristics and the influence to mouth movements, etc and having conducted this study would have assisted the EAP response to the coastal environment questions and assessment of the increased treated effluent volumes being discharged to the estuary.

11. Three Estuarine Management Plans (EMPs) are included in this draft BAR. However, the report does not refer to the other 2, and even the applicable one on page 41 is not recognised as a management tool that was considered during the preparation of this report.

Kindly note that the Branch Oceans and Coasts reserves the right to revise its comments and request further information based on any additional information received. All correspondence, documentation, and/or requests (hard copy and an electronic copy) should be submitted to our office via email to OCEIA@dfpe.gov.za / or Physical Address: Department of Forestry, Fisheries & the Environment (DFPE), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.

Yours sincerely,



Ms Makwarela Mwanza
Acting Director: Coastal Development & Coordination
Department of Forestry, Fisheries, and the Environment
Date: 02/12/2024

Comments on the draft basic assessment report for the proposed upgrade and expansion of the Macassar Wastewater Treatment Works (WWTW) and associated infrastructure, Macassar, City of Cape Town.

Ref	DFPE Comment	Response
	The area are then covered by sand due to mobile dune movement. Approximately 1 to 2 m from former of sediments are transported past the South African coastline at any given time when used or used about every year due to south-westerly wind age. But results in a net-erosion of 8 m is therefore important to treat the area so that it does not cause problems in other areas. The ICM Act requires us to consider "Integrated Coastal Management" as an existing process that stems from past experiences on the east and west coasts of South Africa and coastal zone and sustainable use. It is acknowledged that the initial EIS was approved in 2015. The Macassar WWTW was constructed in a flood plain. It is also relevant of the line delineated by the City of Cape Town and the results of the studies done that the Macassar WWTW is within the 1:100 year flood zone. It seems that it is a consideration to have such large infrastructure in the area Macassar WWTW is in. In case of flooding, how will the overflow of untreated wastewater be managed?	The proposed development entails an extension and rehabilitation of the existing Macassar WWTW, and the City of Cape Town already has bulk infrastructure in place (i.e., bulk sewer and bulk stormwater) which includes overflow and discharge weirs from the catchments being served by the Macassar WWTW, and as such alternative sites for the proposed developments are not possible and feasible. Portion of the existing infrastructure is situated in the 1:100 year flood line, this includes old storage lagoons and the maturation ponds. The old storage lagoons shall be cleared of sludge and related infrastructure shall be demolished in place of them at a higher level as part of the proposed development. The flood ground level will be above the 1:100 year flood line. For the maturation ponds, portions of the ponds shall be demolished. This confirms the portion of the existing and rehabilitated infrastructure which is in the 1:100 year flood line. In terms of the proposed development, provision has been made by elevating the final ground level above existing topography of the site such that the new ground level is higher than the 1:100 year flood line. In addition to this, the inlet works is elevated and contains a double 18° curve pump station allowing flow-through to flow under gravity to the different process units where the top water level and top of concrete levels of the process units ensuring that they are not flooded in the event of a 1:100 year flood event. The treated effluent channels which are located around the maturation ponds also sits higher than the 1:100 year flood line. The Macassar WWTW stormwater drainage system will be implemented to accommodate the development requirements, topography, as well as the CoCT's stormwater management policy. The grade of the roads and decreased areas around the structures are designed to ensure that water is directed off-site appropriately. The proposed stormwater drainage network is based on a dual stormwater system, consisting of a major and minor network, conveying stormwater generated on the site via pipes and overland flow culled into the

Project number: 1001785, Letter to DFPE, CC: 02/12/2024, Ref: 0



Ref	DFPE Comment	Response
	concrete lined maturation pond, positioned along the southern most boundary of the Wastewater WWTW site. For details of the Storm and Stormwater design refer to enclosed drawing 1001785-000-002-000-012-11 and 1001785-000-002-000-012-11. In terms of storage (pond), redundancy is critical in the design of a WWTW, since it prevents unexpected downtime of specific systems when one or more pieces of equipment is out of commission as a result of a failure. Subsequent redundancy has been considered and covered for at all critical process units. However, in the event of unforeseen operational failure, alternative at the inlet works has been made for redundancy and bypasses to avoid any overflow and flooding.	• An emergency overflow from the inlet works (storm surge) located after the first set of 18° curve pumps to the emergency tank is allowed for in the design. In the event that the screening channels and/or the bypass screening channels are not operational or experiencing flow in excess of the Peak 10m Discharge Flow, overflow from the emergency tank will flow back to the inlet works should be operational. A concrete overflow will be provided from the emergency tank to the concrete lined maturation ponds. This will serve to relieve the inlet works equipment in the event that the inlet emergency retention ponds, and the emergency tank is at capacity. Overflow which makes it into the ponds will then be pumped back to the inlet works once it is operational. • Another emergency overflow from the inlet chamber of the inlet works to the emergency ponds (storm surge pond) has been designed and will be used under extreme circumstances (in case the first set of 18° curve pumps are not operational). Overflow from the ponds will then be pumped back to the inlet works once it is operational. • The probability of the above two scenarios is minimal as the inlet works include stand-by equipment should a set of equipment fail. In addition, there is standby power options namely from the combined heat and power facility (backup power option 1) and the diesel generator (backup power option 2).

Project number: 1001785, Letter to DFPE, CC: 02/12/2024, Ref: 0



Ref	DFPE Comment	Response
Item 6	Section 69 of the ICM Act stipulates that no person may discharge effluent that originates from a source on land into coastal waters except in terms of a general discharge authorization or a coastal waters discharge permit issued by the Minister. Therefore, the applicant should liaise with the Branch via CWDP@dfpe.gov.za to ascertain whether the effluent discharge permits in terms of the ICM Act would be required or not.	The Macassar Wastewater Treatment facility discharges treated effluent into the Sardinia River and into coastal waters. The facility has as such been issued with a license (1001785-000-002-000-012-11) in terms of Chapter 4 of the National Water Act, 1996, which allows for discharge of 62.1 Mm³ into the Sardinia River Estuary. The City of Cape Town has applied for an amendment to decrease the discharge into the Sardinia River Estuary to 50 Mm³ Average Dry Weather Flow.
Item 9	It should further be noted that the use of vehicles in the coastal areas is prohibited in South Africa. The applicant in the BAR is however an organ of state which will be covered under regulation 3(1)(d) of the Control of Use of Vehicles in the Coastal Area Regulations published in GN R. 496 of 27 June 2014.	Noted.
Item 10	The location for the proposed WWTW upgrade and expansion is adjacent to the estuary and the discharge of the treated effluent will be on the estuary, however, the Estuarine Impact Assessment was not conducted to assess the present ecological health/integrity and conservation/ecosystem services value of the study area that will be affected by the proposed development with due consideration of the following: the impact on river hydraulics, the flow and channel characteristics and the influence to mouth movements, etc and having conducted this study would have assisted the EAP response to the coastal environment questions and assessment of the increased treated effluent volumes being discharged to the estuary.	Please note that the current BA of 2016 is valid, and the previous BA process considered and considered: regulatory requirements pertaining to the discharge of land-based effluent into the Sardinia River, as well as the requirements relating to development in the coastal protection zone. The necessary Impact Assessment was done at the time.
Item 11	Three Estuarine Management Plans (EMPs) are included in this draft BAR. However, the report does not refer to the other 2, and even the applicable one on page 41 is not recognised as a management tool that was considered during the preparation of this report.	Please note that the current BA of 2016 is valid, and the previous BA process considered and considered: regulatory requirements pertaining to the discharge of land-based effluent into the Sardinia River, as well as the requirements relating to development in the coastal protection zone. The necessary Impact Assessment was done at the time.

Project number: 1001785, Letter to DFPE, CC: 02/12/2024, Ref: 0



Kind Regards
Kgomotso Mohlodini
National Department of Water and Sanitation
Berg - Olifants WMA



WESTERN CAPE REGION
Private Bag X 16, Steynacht 7532 / 52 Voortrekker Road, Bellville 7530
Tel # (021) 941 6358 Fax # (021) 941 6377

Enquiries : K Mohlodini
Tel # : (021) 941 6358
Email : mohlodink@dws.gov.za
Reference : 16/27/GZ2H/A/11

Attention : Marianna Taljaard

Zutari (Pty) Ltd
P.O. Box 509
GEORGE
6530

Dear Sir/Madam

MACASSAR WASTEWATER TREATMENT WORKS, CAPACITY EXTENSION AND ASSOCIATED INFRASTRUCTURE REFURBISHMENT, WESTERN CAPE

Reference is made to the above mentioned document with DEA&DP Ref Number: 16/3/3/1/A3/39/2054/24.

This Department has perused the submitted application and has the following comments:

1. The Department notes the submitted application (ref number WU27483) to this Department for the proposed activity triggering section 21 (f) (discharging waste or water containing waste into a water resource through a pipe, canal, sewer, sea outfall or other conduit). The proposed water use cannot take place until the water use authorisation has been issued.
2. Please note that no activity must take place within the 1:00 year flood line or within 500m from the boundary of any wetland. Should this be unavoidable, an authorization must be obtained from this Department before commencement of the activity.
3. No abstraction of surface or groundwater may be done, or storage of water be created without prior authorisation from this Department, unless it is Schedule 1 or Existing Lawful use as described in the National Water Act 1998 (Act No. 36 of 1998)
4. No storage facility for wastewater which may detrimentally impact on a water resource be created without prior authorisation from this Department.
5. No surface, ground or storm water may be polluted as a result of activities on the site. In the event that pollution does occur, this Department must be informed immediately.
6. The person who owns, controls, occupies or uses the land in question is responsible for taking measures to prevent any occurrence of pollution to water resources.



Kind Regards
Marianna Taljaard

7. The comments issued shall not be construed as exempting the applicant from compliance with the provisions of any other applicable Act, Ordinance, Regulation or By-law.
8. All the requirements of the National Water Act, 1998 (Act 36 of 1998) regarding water use and pollution prevention must be adhered to at all times.
9. Please note that this Department reserves the right to amend and/or add to the comments made above in the light of subsequent information received.

Please do not hesitate to contact the above office should there be any queries.

Sincerely,



PROVINCIAL HEAD: WESTERN CAPE
Signed by: Nelisa Ndobeni
Designation: Control Environmental Officer
Date: 06 December 2024

Comment Received with Second Round of PPP:

Email Received Dated: 12/02/2025

Good afternoon
Hope you are well
Kindly find attached the comments on the above-mentioned proposed activity
Kind Regards
Kgomotso Mohlodini
National Department of Water and Sanitation
Berg - Olifants WMA

Email Response Dated: 19/02/2025

Dear Mohlodini,
Thank you for your email.
Your comments have been forwarded to the client, CoCT, as the WUL will be handled by them.
Kind Regards
Marianna Taljaard



water & sanitation
Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

WESTERN CAPE REGION
Private Bag X 16, Saksenkof, 7532 / 52 Voornrekker Road, Bellville 7530
Tel. #: (021) 941 6358 Fax #: (021) 941 6077

Enquiries : K Mohlodi
Tel # : (021) 941 6358
Email : mohlodi@wscs.gov.za
Reference : 16/27/G22H/A/11

Attention : Marianna Taljaard

Zutari (Pty) Ltd
P.O. Box 509
GEORGE
6530

Dear Sir/Madam

REVISED DRAFT BAR: MACASSAR WWTW, CAPACITY EXTENSION AND ASSOCIATED
INFRASTRUCTURE REFURBISHMENT, WESTERN CAPE

Reference is made to the above mentioned document with DFFE Ref No/ Verw Nr:
16/3/3/1/A3/39/2054/24. This Department has perused the submitted application and has the
following comments:

1. The comments received from this Department dated 06 December 2024 are still applicable and
valid.
2. The comments issued shall not be construed as exempting the applicant from compliance with
the provisions of any other applicable Act, Ordinance, Regulation or By-law.
3. Please note that this Department reserves the right to amend and/or add to the comments
made above in the light of subsequent information received.

Please do not hesitate to contact the above office should there be any queries.

Sincerely,

PROVINCIAL HEAD: WESTERN CAPE
Signed by: Nelisa Ndobeni
Designation: Control Environmental Officer
Date: 12 February 2025



NATIONAL DEVELOPMENT PLAN
Our Future - make it work.

SECOND ROUND – PUBLIC PARTICIPATION PROCESS

8.1_29	Dr Cedric Hendricks		Email Received Dated: 14/01/2025 If the CoCT issued an Environmental authorization, then why hold public participation with our community? Why again and what for! We need to have a meeting with you (Zutari) before embarking on the public participation. This process of you are all skewed meaning you've ignored what was said and asked by the community! This is exactly what the CoCT does, it downgrades the community leadership, setting themselves above communities! Email Received Dated: 14/01/2025 Where and what time? Has the Broader Macassar Ward 109 been reached and how and when?	Email Response Dated: 14/01/2025 Dear Dr Hendricks, Thank you for your emails. In reference to the public meeting, please note in the email below, the venue is stated as well as the time. SECOND PUBLIC ENGAGEMENT MEETING INVITATION You are hereby invited to attend a public engagement meeting on 29 January 2025 at the Macassar New Community Hall at 8 Burg Street, Macassar from 17:30 to 18:30. The purpose of the meeting is to provide further background on the proposed upgrade of the Macassar Water Treatment Works Project and to share what the Environmental Authorisation Process entails (inclusive of the Biodiversity Offset). You are most welcome to join this meeting. We look forward to meeting you, to discuss the proposed project and to respond to any questions/concerns you may wish to pose to the project team. All registered I&APs on the database has been informed due to the POPI Act, we cannot disclose contact details. Furthermore, please note that an advert (Afrikaans and English) will be placed tomorrow in the District Post Newspaper and flyers inviting members of the community has been distributed to the library, local convenience store and the Community Hall informing local residents of the said meeting. Just to clarify, the EIA process, this is a second round of Public Participation due to the interest in the project. After closure of the next 30-days of PPP, a final Basic Assessment Report will be submitted to the relevant Authority, which is the Department of Environmental Affairs and Development Planning, who will decide on the outcome of the application for the upgrade of the Macassar WWTW. Kind Regards Marianna Taljaard
8.1_30	David Whitelaw	Chairman: Cape Bird Club Conservation Committee	Email Received Dated: 14/01/2025 Dear Zutari Staff, Please register me as an I&AP for the revised development of the Macassar WWTW. Regards, David Whitelaw Chairman: Cape Bird Club Conservation Committee	Email Response Dated: 15/01/2025 Good Day David Trust you are well. Kindly note that you have been added to our stakeholder database. Kind Regards Marianna Taljaard
8.1_31	Christopher Gird	Sitari Country Estate	Email Received Dated: 28/01/2025 Good day Corlie, https://www.zutari.com/macassar-wwtw-public-participation/ Can you please share further information on the public participation process for Macassar Wastewater Treatment Works capacity extension and associated infrastructure refurbishment. We are the developers of Sitari Country Estate which is serviced by this plant and we also suffer from foul odours originating from this plant from time to time.	Email Response Dated: 29/01/2025 Dear Christopher, Thank you for your email. We have added you to the database for Interested and Affected Parties (I&APs). Please be informed that Zutari (Pty) Ltd has been appointed by City of Cape Town to undertake the Environmental Authorisation Application in terms of the National Environmental Management Act (Act No. 107 of 1998) (NEMA) via a Basic Assessment (BA) process, per the 2014 EIA Regulations, as amended, for the Macassar

			Please confirm the process to be listed as an interested and affected party on this project Christopher Gird Project Manager	Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment, Western Cape. <u>Please note that a second round of Public Participation will start: 15 January 2025 to 14 February 2025</u> On the 07 July 2016, the Department of Environmental Affairs and Development Planning issued an Environmental Authorisation (EA) 16/3/1/1/A3/39/2078/14 to the City of Cape Town approving the proposed upgrade and expansion of the Macassar Wastewater Treatment Works (WWTW) and associated infrastructure. However, due to the time that has passed since the approval in 2016, new design engineers have been appointed to finalise the detailed design. The 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 proposed revision to the design upgrades will require the clearance of more than 1ha of indigenous vegetation, which includes Endangered Cape Flats Dune Strandveld vegetation. Therefore, Listing Notice 1, Activity 27 and Listing Notice 3 Activity 12 is being applied for. The Draft Basic Assessment Report (BAR) is available for comment for a period of 30-days, from <u>15 January 2025 until 14 February 2025</u>. The report can be accessed at: - A hard copy of the Draft BAR has been made available at Macassar Public Library, 10 Bind Avenue, Macassar; and - Online at: https://www.zutari.com/macassar-wwtw-public-participation/ <u>Changes to the Draft BAR (Second Round) entail <i>inter alia</i>:</u> - The draft Basic Assessment Report has been updated accordingly on the following pages, namely: Cover page, 4 -6, 8-11, 19-22 ,24, 26-27, 29-34, 37, 41-43, 44-45, 59-60, 80, 86-88, 91, 94-96. For ease of reference the updated sections text is orange in colour, bold and underlined. - The EMPr has been updated with additional changes, please refer to page 8, 9,10,19, and Table 2.The Environmental Management Plan has been amended following on from the comments received during the public participation process. Changes include some additional environmental management / mitigation measures. Additionally distinct project phases have been added where specific environmental management / mitigation measures are applicable per phase. Appendix F has been updated with the PPP to date comprising of the PP Report, meeting records, email and hard copy notifications /letters, adverts, transmittal notes, presentation, database (contact details removed due to POPI Act), and the Comments and Response Report (CRR) (Appendix F.8). If you wish to register as an Interested and Affected Party and/or submit further comments or concerns, please do so in writing by sending an email to PPP@zutari.com <u>SECOND PUBLIC ENGAGEMENT MEETING INVITATION</u> You are hereby invited to attend a public engagement meeting on 29 January 2025 the Macassar New Community Hall at 8 Burg Street, Macassar from 17:30 to 19:30 The purpose of the meeting is to provide further background on the proposed upgrade the Macassar Water Treatment Works Project and to share what the Environment Authorisation Process entails (inclusive of the Biodiversity Offset process). You are most welcome to join this meeting. We look forward to meeting you, to discuss the proposed project and to respond to a questions/concerns you may wish to pose to the project team In reference to the odour the following: As part of the proposed upgrade to the Macassar WWTW, select process structures/buildings are expected to produce odours during the operations phase of the project. However, the design engineers have taken necessary measures to ensure that these odours are managed and suitably treated. Mechanical and Electrical Specifications have been prepared which outlines the requirements which the Contractor (under Contract 191Q/2023/24) will need to consider in order to address odour for process structures/buildings which may generate odour. The following key process structures/buildings listed below are anticipated to generate odour and have
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				appropriate systems in place to address the odour (structures/buildings believed not to generate significant odour are not listed): a) Odour Control System (Inlet Works and Sludge Stream Structures) i. All sumps and channels that are not covered by concrete slabs will be covered with GRP panel covers (with portions removable). The covers will have a rigid continuous rubber seal between panels and foul air will then be extracted from the channels through piping and taken to an odour control system for treatment. ii. Each of the screenings and grit collection skip dollies at the inlet works will be covered with GRP hoods. Foul air will be extracted from the hoods and treated with the air extracted from the inlet works channels. iii. The odour control system will incorporate biological treatment technology that is capable of treating and neutralizing odours generated at the inlet works and sludge stream structures. The equipment shall be designed to oxidise odorous compounds from the continuous flow of contaminated air. If the inlet H2S (Hydrogen Sulphide) concentration is greater or equal to 20 part per million by volume (ppmv) the equipment will be designed to remove 99 % of hydrogen sulphide entering the system or better. If the inlet H2S concentration is less or equal to 20 ppmv the outlet H2S concentration must be less or equal to 0.1 ppmv. The treated gas will be transferred to a stack and be released to atmosphere, the stack will be at least 3m high. iv. In addition, the appointed Mechanical & Electrical contractor will be required to employ a specialist air dispersion consultant to model the odour release from the entire Macassar WWTW site and the dispersion of the odour release across the entire site and surrounding urban areas. The odour study will also incorporate the study of odour sources at the site to facilitate the design of the bio-trickling filter. b) Odour Control System (Dewatering Building) i. The biological treatment technology (odour control unit) will incorporate either a biofilter, biotrickling filter or a hybrid system (including a combination of biotrickling filter and biofilter system). ii. Odorous air will be conveyed via ducting from the various belt presses and linear screens and combine in a manifold. Odorous air from this manifold will then be conveyed to the odour treatment unit where treatment will take place. iii. The equipment will be designed to oxidise odorous compounds from the continuous flow of contaminated air. The equipment shall be designed to remove 99% of hydrogen sulphide entering the system for inlet H2S concentrations of 20 ppmv or greater or H2S outlet concentration of 0.5 ppmv or less for inlet H2S concentrations below 20 ppmv; and 85% of other reduced sulphur organic compounds. The treated gas will be transferred to a stack and released to the atmosphere. Kind regards Corlie Steyn
			Email Received Dated: 28/01/2025	

From: WordPress <wordpress@zutari.com>
 Sent: Tuesday, 28 January 2025 10:54
 To: ppp
 Subject: Macassar | Public Participation form submission:

Name

Christopher
Gird

Organization

Sitari
Country Estate

Role

Developer

Phone Number

[REDACTED]

Email

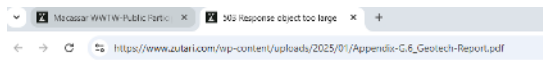
[REDACTED]

CommentsOrQuestions

Please
list us as an interested or affected party.

This form submitted at: <https://www.zutari.com/macassar-wwtw-public-participation/>

© Zutari.

8.1_32	Phil Frenzel	Freshwater Consulting	Email Received Dated: 31/01/2025 Hi Corlie, I hope you are well. I have just come across the Macassar WWTW upgrade reports and documentation on the Zutari website. I am struggling to download the geotechnical report (i.e. Appendix G.6). I get a notification that the object is too large to download. May I kindly ask you to please send the report via email?  Error 503 Response object too large Response object too large Error 54113 Details: cache cpl13826 CPT 1738304112 686780418 Varnish cache server	Email Response Dated: 31/01/2025 Hi Phil, I hope you are doing well. Please see link below to the Geotech report. https://drive.google.com/file/d/1A1xE-5opU0VvKsFX90GLHZDfi51DR_Ck/view?usp=sharing Kind regards Corlie Steyn
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			Many thanks. Best regards, Phil	
			Email Received Dated: 31/01/2025 Hi Corlie, Thank you so much. I have managed to download the report. Best regards, Phil	
8.1_33	Natisha Herberstein	Sitari Country Estate Master Home Owners Association	Email Received Dated: 03/02/2025 Dear Corlie, I hope you are well. Please could you kindly advise on how Sitari Country Estate Master Home Owners Association can register with yourselves? If possible, please could you include Deon Duvenage (Operations Manager) deond@sitari.co.za as well as Craig Tibbit (Estate Manager) craigt@sitari.co.za for Sitari Country Estate to the database for Interested and Affected Parties (I&Aps). Thanking you kindly and best regards. Tish	Email Response Dated: 06/02/2025 Dear Natisha, Trust you are well. Kindly note that you, Deon and Craig have been added to our stakeholder database. Kind Regards Marianna Taljaard
8.1_34	Motlagomang Chobokoane (Tlagi)	Rheinmetall Denel Munition	Email Received Dated: 04/02/2025 Good Afternoon Rheinmetall-Denel Munition Denel Munition would like to be registered as an interested and affected Party or the Macassar Solar Plant expansion. Communication must be forwarded to @Motlagomang Chobokoane and @Gcobisa Vena. Kind regards Motlagomang Chobokoane (Tlagi) SHE Manager Operations Risk Management	Email Response Dated: 06/02/2025 Dear Motlagomang & Gcobisa, Trust you are well. Kindly note that you have been added to our stakeholder database. Kind Regards Marianna Taljaard
8.1_35	Stephen Carelse	Concern Citizen of Ward 109	Email Received Dated: 05/02/2025 Good morning My name is Stephen Carelse. I am a resident of Macassar for all my life. I'm currently staying at 16 Dakota Street Macassar 7134, which is literally 100m away from the waterwaste plant. I been living here for more than 23 years and for tye past year the stinking smell from this plant is unbearable, we can't even open our doors sometimes because of the stink, This is not good for any human what to think about my 10 month old granddaughter. This is my unhappiness regarding this WWTW plant and the upgrade of it, I don't have anything against the upgrade, but what about us as humans, don't anybody respect us? Please let me know if this email finds the right people. For to long everything is just happening without our consent, we have a human right to get better treatment and live in better conditions than this smelly place at this moment. Regards Stephen Carelse Concern Citizen of ward 109	Email Response Dated: 05/02/2025 Dear Mr Carelse, Thank you for your email. Your concern is noted. One of the purposes of the proposed upgrade is to address the odour and to improve this situation. <u>Please see below an explanation from the technical team as to what exactly is planned.</u> As part of the proposed upgrade to the Macassar WWTW, select process structures/buildings are expected to produce odours during the operations phase of the project. However, the design engineers have taken necessary measures to ensure that these odours are managed and suitably treated. Mechanical and Electrical Specifications have been prepared which outlines the requirements which the Contractor (under Contract 191Q/2023/24) will need to consider in order to address odour for process structures/buildings which may generate odour. The following key process structures/buildings listed below are anticipated to generate odour and have appropriate systems in place to address the odour (structures/buildings believed not to generate significant odour are not listed): a) Odour Control System (Inlet Works and Sludge Stream Structures) i. All sumps and channels that are not covered by concrete slabs will be covered with GRP panel covers (with portions removable). The covers will have a rigid continuous rubber seal between panels and foul air will then be extracted from the channels through piping and taken to an odour control system for treatment.

				ii. Each of the screenings and grit collection skip dollies at the inlet works will be covered with GRP hoods. Foul air will be extracted from the hoods and treated with the air extracted from the inlet works channels. iii. The odour control system will incorporate biological treatment technology that is capable of treating and neutralizing odours generated at the inlet works and sludge stream structures. The equipment shall be designed to oxidise odorous compounds from the continuous flow of contaminated air. If the inlet H2S (Hydrogen Sulphide) concentration is greater or equal to 20 part per million by volume (ppmv) the equipment will be designed to remove 99 % of hydrogen sulphide entering the system or better. If the inlet H2S concentration is less or equal to 20 ppmv the outlet H2S concentration must be less or equal to 0.1 ppmv. The treated gas will be transferred to a stack and be released to atmosphere, the stack will be at least 3m high. iv. In addition, the appointed Mechanical & Electrical contractor will be required to employ a specialist air dispersion consultant to model the odour release from the entire Macassar WWTW site and the dispersion of the odour release across the entire site and surrounding urban areas. The odour study will also incorporate the study of odour sources at the site to facilitate the design of the bio-trickling filter. b) Odour Control System (Dewatering Building) i. The biological treatment technology (odour control unit) will incorporate either a biofilter, biotrickling filter or a hybrid system (including a combination of biotrickling filter and biofilter system). ii. Odorous air will be conveyed via ducting from the various belt presses and linear screens and combine in a manifold. Odorous air from this manifold will then be conveyed to the odour treatment unit where treatment will take place. iii. The equipment will be designed to oxidise odorous compounds from the continuous flow of contaminated air. The equipment shall be designed to remove 99% of hydrogen sulphide entering the system for inlet H2S concentrations of 20 ppmv or greater or H2S outlet concentration of 0.5 ppmv or less for inlet H2S concentrations below 20 ppmv; and 85% of other reduced sulphur organic compounds. The treated gas will be transferred to a stack and released to the atmosphere. Please let us know if you have any further questions. Kind regards Corlie Steyn
8.1_36	Mercia J Liddle	Department of Environmental Affairs and Development Planning: Coastal Management	Email Received Dated: 06/02/2025 Good day, Please be advised there are no further comments from the sub-Directorate: Coastal Management. Kind Regards Mercia Liddle Environmental Office: Coastal Management Department of Environmental Affairs and Development Planning Western Cape Government	Email Response Dated: 06/02/2025 Dear Mercia, Thank you for the feedback, it is much appreciated. Kind regards Corlie Steyn
8.1_37	David Whitelaw	Chairman Cape Bird Club Conservation Committee	Email Received Dated: 06/02/2025 Dear Ms. Taljaard, Could you please register me as an Interested and Affected Party. Regards, David Whitelaw Chairman Cape Bird Club Conservation Committee	Email Response Dated: 07/02/2025 Good day David, Thank you for your email. Kindly note that you have been added to our stakeholder database. Kind Regards Marianna Taljaard
8.1_38	Nompumelelo Lekalakala	Department of Forestry, Fisheries	Email Received Dated: 14/02/2025	Email Response Dated: 20/02/2025

Good morning,
Please see attached comments for your attention.
Best Regards
Nompumelelo Lekalakala
B&C: Biodiversity Mainstreaming & EIA
Department of Forestry, Fisheries and the Environment

 **forestry, fisheries
& the environment**
Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag 2447, Pretoria, 0001, Environment House, 473 Steyn Biko Road, Pretoria, 0002 Tel: +27 12 359 9000, Fax: +27 86 625 1942
Reference: 16/3/31/A3/39/2054/24
Enquiries: Porla Makita
Telephone: 012 399 9411 **E-mail:** pmakita@dfre.gov.za

Attn: Corlie Steyn
Zutari

Email Address: Corlie.Steyn@zutari.com

PER EMAIL

Dear Ms Steyn

COMMENTS ON THE AMENDED DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED MACASSAR WASTEWATER TREATMENT WORKS, CAPACITY EXTENSION AND ASSOCIATED INFRASTRUCTURE REFURBISHMENT, WESTERN CAPE PROVINCE

The Directorate: Biodiversity Conservation has reviewed and evaluated the reports.

The proposed development is for the upgrade and expansion of the existing Macassar Wastewater Treatment Works (WWTW) and associated infrastructure on the basis that they were necessary to continue to provide essential wastewater treatment services to the surrounding community on Erf No. 1205 Macassar, however, the effluent outlet overlaps on Erf No. 703 Firgrove, and the proposed guardhouse will be located on Erf 708.

The study area has been mapped as Critical Biodiversity Area (CBA) 1b due to the presence of protected species (*Sideroxylon inerme* (milkwood) and Species of Conservation Concern (SCC). The proposed upgrade will result in the clearance of approximately 7ha High sensitivity, 2ha Medium sensitivity and 9.3ha Low sensitivity of vegetation within an Endangered Ecosystem (Cape Flats Dune Strandveld) as identified in the 2011 National List of Threatened Ecosystems. Please take note of the recent revised national list of 2022.

To ensure the continued persistence of ecosystems and that national conservation targets are achieved, it is essential that impacts on sensitive and highly localised habitats are minimized or avoided altogether. Amongst others, please ensure that the following recommendations are considered and adhered to:

- The 'no-go' areas of the development property must be clearly demarcated and excluded from the final layout plan.
- No construction camps, temporary or permanent laydown areas or any activities associated with the development are to be located within the important conservation areas.
- The development footprint must avoid the highly sensitive areas with their respective buffer zones.

 **Batho pele** - putting people first

The processing of personal information by the Department of Forestry, Fisheries and the Environment is done lawfully and not excessive to the purpose of processing in compliance with the POPI Act, any codes of conduct issued by the Information Regulator in terms of the POPI Act and / or relevant legislation providing appropriate security safeguards for the processing of personal information of others.

Dear Portia and Nompumelelo, Please see the response from the project team attached. Kind regards Corlie Steyn



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Waterford Precinct
Century City
Cape Town
South Africa
P O Box 494
Cape Town
8005
Doxes: 0X 204
zutari.com

19 February 2025

Ms Portia Makitla
Department of Forestry Fisheries and the Environment
Email: PMakitla@dffe.gov.za

Dear Ms Portia Makitla,

Re: Comments of the Amended Draft Basic Assessment Report (BAR) Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment, Western Cape Province

Your email and letter dated 11 February 2025 and received on 14 February 2025 refers.

Thank you for making the time to raise comments during the second round of the public participation process for the upgrade or the Macassar Wastewater Treatment works (WWTW) on behalf of Department of Forestry Fisheries and the Environment (DFFE).

Please see table below for responses to the comments.

Zulairi (Pty) Ltd | Reg No 1977/0037110/7 | Board of Directors (S/2024) *NN Geogass (Chairperson), T Daka, *AC Dacala, *PJ Hendricks, TBI Margo, *NDL Mobaw, J Nabela, *GT Rohde (Non-Executive Director)



- Prevent the further loss and fragmentation of vegetation communities and the high biodiversity areas in the vicinity of the study area.
- Maintain ecological processes at all scales and avoid or compensate for any effects of land uses on ecological processes.
- Disturbed areas must be rehabilitated as soon as possible after construction with locally indigenous plants to enhance the conservation of existing natural vegetation on site.
- Care must be taken to avoid the re-introduction and spread of alien invasive species.
- Minimize land use types that reduce ecological resilience (ability to adapt to change), particularly at the level of water catchments.
- Implement land use and land management practices that are compatible with the natural potential of the area.
- Permit from relevant authorities must be obtained prior commencement of any construction activities for the disturbance or removal of any nationally or provincially protected species.
- A Search and Rescue Plan to remove and relocate protected species identified within the study area must be developed by a professional and qualified ecologist.

Biodiversity Offset Plan that comply with requirements of National Biodiversity Offset Guidelines must be submitted for comments as part of final report to be submitted for review and decision making. The biodiversity offsetting process, which only applies when a biodiversity offset is required which involves the following steps:

- Identifying the need for a biodiversity offset.
- Determining the requirements of a biodiversity offset and compilation of a Biodiversity Offset Report.
- Preparing biodiversity offset conditions for an EA.
- Selecting the biodiversity offset site.
- Securing the biodiversity offset site.
- Preparing a Biodiversity Offset Management Plan.
- Concluding a Biodiversity Offset Implementation Agreement.

Three Offset Options 1, 2, and 8 were noted as the most suitable candidates and selected based on their suitability for achieving biodiversity offset targets. Option 1: located within the WWTW property, this site satisfies "like-for-like" criteria for Cape Flats Dune Strandveld vegetation. This option is located within the WWTW property thus negating the need for additional purchasing of property. Option 7: located within the EN Cape Flats Dune Strandveld, thus satisfying the "like-for-like" criteria pertaining to vegetation type. The property is also state-owned; and Option 8: Although Option 8 is not located within the same vegetation type as that of the WWTW (i.e., EN Atlantis Sand Fynbos and EN Swartland Granite Renosterveld vs. EN Cape Flats Dune Strandveld), the use of Option 8 as an offset is still considered acceptable as it involves an even trade of EN vegetation for EN vegetation.

The Directorate also acknowledge the comprehensive offset ratio calculations, adjusted for habitat sensitivity and functionality (e.g., presence of functioning CBA habitat), determined that 176.3 ha habitat is required to achieve compliance with biodiversity offset standards and ensure the long-term viability of the affected ecosystems.

Batho pele- putting people first

No	DFFE Comment	Response
	The Directorate: Biodiversity Conservation has reviewed and evaluated this comment. The proposed development is for the upgrade and expansion of the existing Macassar Wastewater Treatment Works (WWTW) and associated infrastructure on the basis that they are necessary to continue to provide essential wastewater treatment services to surrounding community on Erf No. 1203 Macassar. However, the effluent outfall overlaps on Erf No. 1203 Fgigrove, and the proposed guard house will be located on Erf 1768. The study area has been mapped at CSA T10 due to the presence of protected species (Chloroceryle minor (milkou) and Species of Conservation Concern (scs)). The proposed upgrade will result the clearance of approx 7ha high vegetation, 2ha Medium sensitivity and 8.9ha Low sensitivity of vegetation within an Endangered Ecosystem (Cape Flats Dune Strandveld) as identified (i the 2001 National List of Threatened Ecosystems Please take note of the recent revised National List of 2022). To ensure the continued persistence of ecosystem and that national conservation targets are met, the following mitigation measures for sensitive and highly localized habitats are minimized or avoided altogether. Amongst others, please ensure that the following recommendations are considered and adhered to: • The 'no-go' areas of the development property must be clearly demarcated and excluded from the final layout plan. • No construction camps, temporary or permanent laydown areas or any activities associated with the development are to be located within the important conservation areas. • The development footprint must avoid the highly sensitive areas with their respective buffer zones. • Prevent further loss and fragmentation of vegetation communities and high biodiversity areas in the vicinity of the study area.	We thank the DFFE Biodiversity Conservation Directorate for evaluating and providing comments on the Macassar WTTW amended draft RAP. Correct. Note has been taken of the revised national list of 2022 and has been incorporated into the specialist studies and final findings of the BAR. All these mitigation measures have been captured in the Environmental Management Programme appended as Appendix H.1 to the Final EIA. Please refer to Annex H.1.1, and H.1.2 of the EMP for the No-go maps.

Zutari (Pty) Ltd | Reg No: 1977002711507 | Board of Directors (202024): *Nk Georges (Chairperson), T Daka, *AC Dacosta, *P.J Hendricks, TBN Murgu, *NDL Motsepe, J Ntshole, *GIT Roshde (*Non-Executive Director)



ZUTARI

• Maintain ecological processes at all scales and avoid or compensate for any effects of land uses on ecological processes. • Disturbed areas must be rehabilitated as soon as possible after impacts from construction with locally indigenous plants to enhance the conservation of existing natural vegetation on site. • Caves must be taken to avoid the re-introduction and spread of alien invasive species. • Minimise land use types that reduce ecological resilience (ability to adapt to change), particularly at the level of water catchments. • Implement land use and land management practices that are compatible with the natural potential of the area. • Permits from relevant authorities must be obtained prior to commencement of any construction activities for the disturbance of or removal of any nationally or provincially protected species. • A Search and Rescue Plan to remove and relocate protected species identified within the study area must be developed by a professional and qualified ecologist.	
The Directorate also noted the submission of the biodiversity offset strategy to align with the principles and requirements of the 2023 Biodiversity Offset Guidelines. This strategy addresses the residual impacts of the development on the 2N Cape Floral Zone Strandveld, a threatened vegetation type which will be impacted on as part of the rehabilitation of the Masekane WWTP. The Biodiversity Offset Management Plan that comply with the requirements to the National Biodiversity Offset Policy must not be submitted for comments as part of the final report to be submitted for review and decision making. The biodiversity offsetting process, which only applies when biodiversity offset is required which involves the following steps: • Identifying the need for a biodiversity offset • Determining the requirements of a biodiversity offset • Submitting the Biodiversity Offset Plan	A Biodiversity Offset Management Plan that complies with the requirements National Biodiversity Offset Guidelines will be submitted as part of the final BAR report for review and approval. Please refer G.8.3 of the Final BAR for the Biodiversity Offset Plan. A Biodiversity Offset Management Plan has been developed and attached to the final BAR as appendix G.8.3.

Project number 1001780, Letter to DFFE, Amended SAR, Final.docx, 2025/02/19, Rev 2



COMMENTS ON THE AMENDED DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED MACASSAR WASTEWATER TREATMENT WORKS, CAPACITY EXTENSION AND ASSOCIATED INFRASTRUCTURE REFURBISHMENT, WESTERN CAPE PROVINCE

The Biodiversity Offset Agreement must be developed, in more detail, the management and implementation of the offset in terms of comprehensive land use management plans and spatial mapping of interventions within the selected offset sites, the vehicle used for long-term conservation, and monitoring requirements.

Subsequent, the Biodiversity offset site has been selected and secured, the applicant must enter a Biodiversity Offset Implementation Agreement with an implementing party. In terms of such an agreement, the implementing party must agree to implement the Biodiversity Offset Management Plan and the EA holder should agree to make the funds available for such implementation.

The Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@dfre.gov.za for the attention of Mr. Seoka Lekota.

The Directorate reserves the right to revise initial comments presented here if additional information becomes available.

Yours faithfully



Mr Seoka Lekota
Control Biodiversity Officer Grade B: Biodiversity Conservation
Department of Forestry, Fisheries & the Environment
Date: 11/02/2025

- Preparing biodiversity offset conditions for an EA - Selection biodiversity offset site - Securing the biodiversity offset site - Preparing a Biodiversity Offset Management Plan - Concluding a Biodiversity Offset Implementation Agreement	
Three Offset Options 1, 7 and 8 were noted as the most suitable candidates and selected based on their suitability for achieving biodiversity offset targets. Option 1, located within the WWTW property, this site satisfies the "like-for-like" criteria for Cape Flats Dune Strandveld vegetation. This option is located within the WWTW property thus negating the need for additional purchasing of property. Option 7, located within the EN Cape Flats Dune Strandveld, thus satisfying the "like for like" criteria pertaining to vegetation type. The property is also state-owned, and Option 8, Although Option 8 is not located within the same vegetation type as that of the WWTW, the use of option 8 as an offset is still considered acceptable as it involves an even trade of EN vegetation for EN vegetation.	Correct.
The Directorate also acknowledge the comprehensive offset ratio calculation, adjusted for habitat sensitivity and functionality (e.g. presence of functioning CBA habitat), determined that 176.3 ha habitat is required to achieve compliance with biodiversity offset standards and ensure the long-term viability of the affected ecosystems.	Thank you for acknowledging the comprehensive offset ratio calculation, adjusted for habitat sensitivity and functionality (e.g. presence of functioning CBA habitat), determined that 176.3 ha habitat is required to achieve compliance with biodiversity offset standards and ensure the long-term viability of the affected ecosystems.
The Biodiversity Offset Agreement must be developed, in more detail the management and the implementation of the offset of comprehensive land use management plans and spatial mapping of interventions within the selected offset sites, the vehicle used for long-term conservation and monitoring requirements.	This is an ongoing process, and a Biodiversity Offset Specialist has been appointed to complete three Biodiversity Offset Implementation and Management Plans. A Biodiversity Offset Agreement has been developed and signed by the relevant parties, outlining detailed provisions for the management, implementation, and long-term sustainability of the offset.

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	As stated in the Biodiversity Offset Report, the concept Rehabilitation and Management Plan will require refinement during the implementation phase, guided by adaptive management principles to ensure ecological effectiveness. Upon approval of the offset, separate, detailed management plans will be developed for each offset site by suitably qualified specialists. These plans will include targeted interventions tailored to the specific ecological conditions and conservation priorities of each site. Site-specific planning has already been initiated, with consultants appointed to conduct necessary baseline assessments and refine offset interventions. Offset planning remains subject to ongoing engagement with regulatory authorities, landowners, and stakeholders, which may influence final management requirements. Additionally, site conditions may change before implementation (i.e., pending offset approval) due to natural disturbances (e.g., flooding, fire) or human activities, necessitating real-time refinements to management strategies. Furthermore, the development of detailed offset management plans requires input from multiple specialists (e.g., wetland ecologists, erosion control experts, invasive species management specialists). The appointment of these specialists forms a critical component of the implementation phase of the offset strategy. By adopting this structured and adaptive approach, the offset will not only be effectively implemented but also managed over the long term to achieve positive conservation outcomes in line with regulatory expectations.
Subsequent, the Biodiversity offset site has been selected and secured, the applicant must enter a Biodiversity Offset Implementation Agreement with an implementing party. In terms of agreement, the implementing party must agree to implement the Biodiversity Offset Management Plan and EA holder should agree to make the fund available for such implementation	Please refer to Appendix G.8.4 of the Final BAR for the signed Biodiversity Agreement, fulfilling said requirements.
The public participation process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; BCAdmin@dfre.gov.za for the attention of Mr. Seoka Lekota.	Noted. All queries will be submitted to the Directorate: Biodiversity Conservation.
The Directorate reserves the right to revise initial comments presented here if additional information becomes available.	Noted.

Project number: 1001760, Letter to DFPE, Amended BMR, Final.docx, 20250210, Rev 1



				Kind regards  Corlie Steyn Senior Environmental Practitioner Zutari (Pty) Ltd Reg No 1977003271507 Board of Directors (0702204) 'NN Gengana (Chairperson), T Daka, 'AC Dicaula, 'YU Hendricks, 'BU Mergo, 'NEX Motse, 'J Nkomo, 'GT Rorode (Non-Executive Director) 
8.1_39	Dr Cedric Hendricks	Chairperson: Macassar Ward 109	Email Received Dated: 13/02/2025 Public Participation comments,MWWTP Upgrade of The MWWTP,I've submitted my written Comment to you! Please let me know whether you received ? Dr.Cedric Hendricks Phd:Environmental Affairs	Email Response Dated: 14/02/2025 Dear Dr Hendricks, I hope you are doing well. The last written comment Zutari received from you is dated 1 January 2025. The project team responded to this comment on 14 January 2025. Kind regards Corlie Steyn
			Email Received Dated: 14/02/2025 Good Day Ms.Steun! I've sent my written public Participation Redonse to you yesterday and I hope you received it as I emailed it to you as an attachment! I just want to know whethether you 'very received it yesterday? Thankyou Dr. Cedric Hendricks	Email Response Dated: 14/02/2025 Dear Dr Hendricks, I have not received any comments from you yesterday, nor has any of my colleagues. Can you please resend your comments to the required email address as outlined in the PPP notification namely: ppp@zutari.com Kind regards Corlie Steyn
			Email Received Dated: 14/02/2025 Thankyou!	

Email Received Dated: 14/02/2025

What are the challenges of building a New Waste Water Treatment Plant next to the bank of the Eersteriver estuary where a present waste water treatment already stands had negative effects on the fishing population which many fish species used to breed but now no more breeding there due to sludge and sewerage been dumped into it?

The quality of the air - we breathe in our community has already been affected so that it is no longer a pleasure to sit in our gardens at night or even on some days!

This is as a result of the stench coming from our already overloaded pipes which runs through the community !

Who monitors and hold the CoCT accountable for the health and safety of the community who constantly suffer from stomach bugs as a result of air pollution and germs carried into the community by air?

Presently we Macassar Citizens and Residents receive 95% of Sewarage from new gated security villages which have been directed through the Macassar Town Ward 109 and the proposed NWWTP carries sewerage from Somerset West and Strand /Gordon's Bay region which also have it's sewerage pumped to Macassar!

The sewerage from the Winelands and Khayelitsha also gets pumped into eersteriver and MWWTPs.

The challenges of building a new wastewater treatment plant next to the river estuary are numerous and complex:

Environmental Concerns

1. ***Further degradation of the river ecosystem*:** The existing plant's negative impact on the fishing population and breeding grounds is a concern. Additional pollution could exacerbate the problem.
2. ***Water pollution*:** The risk of sludge and sewage entering the river, harming aquatic life, and affecting human health.
3. ***Habitat destruction*:** Construction activities could damage the surrounding ecosystem, disrupting natural habitats.

Health and Safety Concerns

1. ***Air pollution*:** The existing plant's stench and potential for increased air pollution could worsen respiratory issues and other health problems.
2. ***Waterborne diseases*:** Inadequate treatment and disposal of wastewater could lead to the spread of diseases.
3. ***Community health impacts*:** The proximity of the plant to residential areas raises concerns about the long-term health effects on the community.

Social and Economic Concerns

1. ***Community opposition*:** Residents may resist the construction of a new plant due to concerns about health, safety, and environmental impacts.
2. ***Economic impacts*:** The plant's construction and operation could affect local businesses, property values, and tourism.
3. ***Job opportunities and skills development*:** The plant's construction and operation could create job opportunities, but may also require specialized skills.

Regulatory and Governance Concerns

1. ***Lack of effective regulation*:** Inadequate monitoring and enforcement of environmental and health regulations could exacerbate the problems.
2. ***Accountability and transparency*:** The City of Cape Town (CoCT) may not be held accountable for the health and safety impacts on the community.
3. ***Public participation and engagement*:** The community may not be adequately involved in the decision-making process, leading to mistrust and resistance.

To address these challenges, it is essential to:

1. Conduct thorough environmental and social impact assessments.
2. Engage with the community and stakeholders to address concerns and gather feedback.
3. Ensure that the CoCT and relevant authorities are held accountable for the health and safety impacts on the community.
4. Implement effective monitoring and enforcement mechanisms to prevent environmental degradation and health risks.

		5. Consider alternative solutions, such as upgrading the existing plant or exploring new technologies that minimize environmental impacts. 6. A golden carrot of job creation has been hung in front of the Residents noses but with all previous developments it only has been empty promises and empty words to gain the trust of the community! There are still many " Grey Areas" which must be answered by Zutari? Macassar has been made to be the preferred Dumping ground for the sewerage of the Helderberg, Wynlands,Khayetsha.etc. No Sewerage plant's have been ever built in the White Communities sothat there is fairness when it comes to the building and construction of Sewerage,WWT Plant's! This smacks of the Old Apartheid Developments and spacial developments Where we Indigeounous Peoples were described as " Nie Mense,Half animal, Skollies and more derogatory names for a description of our Indigeounous " Coloured Peoples ". Everything is perfectly worked out to use these and specifically this community as dumping grounds for sewerage! waste! Why dump more Sewerage in the sea at Macassar Beach,are we still counted as half animal and less human by White developers! We are forever put on the nackburner as far as environment and health! The CoCT takes no responsibility to developments as they have always done even when it comes to air-quality and our Residents have to wake-up to the smell of sewerage stench During normal hours of the Day! The CoCT prefers to to just close their eyes,ears and noses to what we are experiencing in the Ward 109 Macassar Community! How much Raw Sewerage must our community take and how much more must our health suffer under the Dumping in our Eersteriver and Macassar Beach! Why would it be expected of "The Black and Coloured Peoples, " Indigeounous Peoples to swim and wade in sewerage effluent? Is this our Destiny? Why are there no space or place within e.g.Paardevlei?. The principle of Dumping within Coloured Communities still is "OK " With our White Communities as long as they don't smell,see or hear about such problems! " let's sweep the problem to the so- called Coloured Communities as we always have done! This application is now being rushed after knowing about it since it's inception! The CoCT never considered our Macassar Ward109. This has been their way of conduct toward us for decades now.Wait till the last minute then rush and steamroll the "Poor Coloured" Community! If CoCT or Zutari knew for so long about this project from as far as 2016 why now rush the process and not informing us as an affected community! We were considered as not affected and interested! I'm the Chairperson of The Macassar Environmental & Nature Conservation and Coastal Forum and I represent the Macassar ward109 Community in the Environmental portfolio! They've asked and said to me that this PUBlic Participation Process should not be considered as the last engagement! However it does not mean the last of PPP meetings but it will be a series of discussions with community representatives as a collective! I do hope that the comments I made finds you well and our concerns	
		Email Received Dated: 18/02/2025 Good Day Ms.Corlis! Did you receive my comments I recently to you!	Email Response Dated: 18/02/2025 Dear Dr Hendricks, Zutari can confirm that your comments have been received. The PP period closed on 14 February 2025.

				The Final BAR and Comments and Response Report will be shared with all I&APs Kind regards Corlie Steyn
				Email Response Dated: 20/02/2025 Dear Dr Hendricks, I hope you are doing well. Please see attached the responses from the project team relating to your comments on the amended BAR. Kind regards Corlie Steyn ZUTARI IMPACT. ENGINEERED. T +27 21 525 9400 E capetown@zutari.com A 1 Century City Drive Waterford Financial Century City Cape Town South Africa P P.O. Box 404 Cape Town 8000 Dorcas: 024 204 zutari.com 20 February 2025 Dr Hendricks 59 Clifton St Macassar Cape Town 7134 Email: cedrichendricks505@gmail.com Dear Dr Hendricks, Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment Your email dated 14 February has reference: Thank you for making the time to raise comments during the second round of public participation process for the upgrade of the Macassar Wastewater Treatment works (WWTW). Thank you for attending the second public participation meeting on 29 January 2025 at New Macassar Hall. Please refer below to extracts from correspondence received and answers to the questions and comments raised as provided by the Project team. Please note for the purposes of this correspondence efforts has been made by Zutari to correct and amend typographical and language errors observed in the written correspondence submitted to Zutari, these are indicated in bold square brackets []. <u>Paragraph 1: Extract</u> <i>What are the challenges of building a New Waste Water [Wastewater] Treatment Plant next to the bank of the Eersteriver estuary where a present waste water [wastewater] treatment already stands had negative effects on the fishing population which many fish species used to breed but now no more breeding there due to sludge and sewerage been dumped into it? The quality of the air - we breathe in our community has already been affected so that it is no longer a pleasure to sit in our gardens at night or even on some days! This is as a result of the stench coming from our already overloaded pipes which runs through the community!</i> <u>Paragraph 1: Answer</u> The purpose of the upgrade of the upgrade and extension of the Macassar WWTW is to increase the treatment capacity and improve the overall functionality of the WWTW. The upgrade will address the current issues with the treated effluent quality not meeting the required standards. In addition, as stated by the freshwater specialist the discharge of the WWTW when operating at full capacity should result in a further 'freshening' of the estuary as well as added modification to the seasonal variability (quality and quantity) within the estuary which is important for maintaining biodiversity within the estuary. As part of the proposed upgrade to the Macassar WWTW, select process structures/buildings are expected to produce odours during the operations phase of the project. However, the design engineers have taken necessary measures to ensure that these odours are managed and suitably treated. The Zutari (Pty) Ltd Reg No: 2077020271007 Board of Directors (07/2024): NM (Chairperson), T. Dania, AC (Director), P.O. Hendricks, TB Murgie, NEL, Mhoni, J. Ndaba, GJ (Non-Executive Director) 

following key process structures/buildings listed below are anticipated to generate odour and have appropriate systems in place to address the odour (structures/buildings believed not to generate significant odour are not listed):

- i. Odour Control System (Inlet Works and Sludge Stream Structures)
 - All sumps and channels that are not covered by concrete slabs will be covered with GRP panel covers (with portions removable). The covers will have a rigid continuous rubber seal between panels and foul air will then be extracted from the channels through piping and taken to an odour control system for treatment.
 - Each of the screenings and grit collection skip dollies at the inlet works will be covered with GRP hoods. Foul air will be extracted from the hoods and treated with the air extracted from the inlet works channels.
 - The odour control system will incorporate biological treatment technology that is capable of treating and neutralizing odours generated at the inlet works and sludge stream structures. The equipment shall be designed to oxidise odorous compounds from the continuous flow of contaminated air. The treated gas will be transferred to a stack and be released to atmosphere.
- ii. Odour Control System (Dewatering Building)
 - The biological treatment technology (odour control unit) will incorporate either a biofilter, biotrickling filter or a hybrid system (including a combination of biotrickling filter and biofilter system).
 - Odorous air will be conveyed via ducting from the various belt presses and linear screens and combine in a manifold. Odorous air from this manifold will then be conveyed to the odour treatment unit where treatment will take place.
 - The equipment will be designed to oxidise odorous compounds from the continuous flow of contaminated air. The treated gas will be transferred to a stack and released to the atmosphere.

Paragraph 2: Extract

Who monitors and hold the CoCT accountable for the health and safety of the community who constantly suffer from stomach bugs as a result of air pollution and germs carried into the community by air?

Presently we Macassar Citizens and Residents receive 95% of Sewerage [Sewerage] from new gated security villages which have been directed through the Macassar Town Ward 109 and the proposed NWWTP carries sewerage from Somerset West and Strand /Gordon's Bay region which also have its sewerage [Sewerage] pumped to Macassar!

The sewerage from the Winelands and Khayelitsha also gets pumped into eersteriver and MWWTPs. The challenges of building a new wastewater treatment plant next to the river estuary are numerous and complex:

Environmental Concerns

1. *"Further degradation of the river ecosystem": The existing plant's negative impact on the fishing population and breeding grounds is a concern.*
2. *"Water pollution": The risk of sludge and sewage entering the river, harming aquatic life, and affecting human health.*
3. *"Habitat destruction": Construction activities could damage the surrounding ecosystem, disrupting natural habitats.*

Health and Safety Concerns

1. *"Air pollution": The existing plant's stench and potential for increased air pollution could worsen respiratory issues and other health problems.*
2. *"Waterborne diseases": Inadequate treatment and disposal of wastewater could lead to the spread of diseases.*

		ZUTARI 3. "Community health impacts": The proximity of the plant to residential areas raises concerns about the long-term health effects on the community. Social and Economic Concerns 1. "Community opposition": Residents may resist the construction of a new plant due to concerns about health, safety, and environmental impacts. 2. "Economic impacts": The plant's construction and operation could affect local businesses, property values, and tourism. 3. "Job opportunities and skills development": The plant's construction and operation could create job opportunities but may also require specialized skills. Regulatory and Governance Concerns 1. "Lack of effective regulation": Inadequate monitoring and enforcement of environmental and health regulations could exacerbate the problems. 2. "Accountability and transparency": The City of Cape Town (CoCT) may not be held accountable for the health and safety impacts on the community. 3. "Public participation and engagement": The community may not be adequately involved in the decision-making process, leading to mistrust and resistance. <u>Paragraph 2: Answer</u> As communicated previously Zutari commenced with this project in November 2021 and Zutari's involvement on the project is limited to the last 3 years (i.e., November 2021 to date). The content of the Final Basic Assessment Report follows a legislated template that needs to fulfil the criteria of the Environmental Authorisation process as defined by the National Environmental Management Act (NEMA Act 107 of 1998). The competent Authority is the Provincial Department of Environmental Management and Development Planning (DEA&DP), and the Basic Assessment Report template is the prescribed template to be used as downloaded from the DEA&DP website (April 2024 version is the latest and most up to date version). As explained during the public meetings on 22 November 2024 and 29 January 2025 the aim of this project is to improve the current infrastructure and to address all the impacts as identified during the Basic Assessment process. In terms of the concerns raised the following is noted i. Environmental Concerns: - Further degradation of the river ecosystem: As mentioned above the upgrade will result in improved treatment of sewage and when the plant is operating at full capacity the discharge of the WWTW should result in a further 'freshening' of the estuary as well as added modification to the seasonal variability (quality and quantity) within the estuary which is important for maintaining biodiversity within the estuary. As such one could expect that the proposed upgrade would at least improve on the existing water quality situation in the Eerste River Estuary. - Water Pollution: In terms of potential sewage spills to the estuary and river note that the design makes allowance for redundancy, and this prevents unplanned downtime of specific systems when one or more pieces of equipment is out of commission as a result of a failure. Equipment redundancy has been considered and catered for at all critical process units. However, in the event of unforeseen operational failures allowances at the inlet works has been made for redundancy and bypasses to avoid any overflow and flooding which includes two scenarios, scenario 1 is the overflow to emergency overflow ponds and scenario 2 is overflow to the emergency flow balancing tank. In Scenario 1 the emergency overflow is to concrete lined ponds, these ponds have been designed to be used under extreme circumstances. Sewage from the ponds will then be pumped Project number: 1001780, Final Letter to De Hantschke, Amended SAR.docx, 20250216, Rev 0 
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		ZUTARI back to the inlet works once it is operational. In scenario 2, overflow from the inlet works common sump to the emergency tank is allowed for in the design, in the event that the screening channels and/or the bypass screening channels are not operational or experiencing flows in excess of the Peak Wet Weather Flow. Sewage from the emergency tank will flow back to the inlet works should it be operational. In addition a passive overflow will be provided from the emergency tank to the concrete lined maturation ponds. This will serve to relieve the inlet works equipment in the event that the initial emergency situation persists, and the emergency tank is at capacity. Sewage which makes it way to the ponds will be pumped back to the inlet works once it is operational. - Habitat destruction: The overall conclusion is that the proposed expansion of Macassar WWTW will result in the loss of habitat therefore an offset has been proposed because all the foregoing steps in the mitigation hierarchy have been considered. Refer Appendix G.8.2 for the Biodiversity Offset and site selection process. ii. Health and Safety Concerns: - Waterborne diseases and Community and Health and Safety Impacts: Health and safety issues must be raised with the Health and Safety Department of the City of Cape Town. - Air Pollution: An operational odour management plan will be submitted to the City's Air Quality Management Unit and DEADP prior to the commencement of construction activities for the site. Mitigation measures to address current odour issues, therefore need to be incorporated into the Odour Management Plan, for which adequate resources must be made available, in order to enable the management authority of the WWTW to implement the mitigation measures going forward. Noting current budget constraints that are impacting on the ability to mitigate the present circumstances. iii. Social and Economic Concerns: - The use of participation of targeted local labour from the project area (expected to be approximately 600 construction job opportunities over construction duration) during the construction phase of the project. Local labourers should be registered on the City of Cape Town Databases. Job opportunities will be facilitated by an appointed Community Liaison Officer and the respective ward councillors; however, the appointment of local labour will be through the Principal Contractor. - The use of participated targeted enterprises from the project area has been specified in the construction tenders. - As noted in a previous response the project will hold a socio-economic benefit to the community and the greater area at large as it will improve the quality of treated effluent being released into the Eerste River and the new WWTW will be able to handle the volume of effluent it is currently receiving. This will result in an area wide positive impact as protecting the environment is beneficial to all people. Furthermore, the project will result in job creation for local communities (directly and indirectly) which will improve both social and economic conditions. iv. Regulatory and governance concerns: - It is recommended that the concerns raised in terms of regulation and governance are directed through appropriate channels to the relevant Municipal or Local Government departments. <u>Paragraph 3: Extract</u> To address these challenges, it is essential to: 1. Conduct thorough environmental and social impact assessments. 2. Engage with the community and stakeholders to address concerns and gather feedback. Project number: 1001780, Final Letter to De Henshike, Amended SAR.docx, 20250216, Rev 0 
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			ZUTARI 3. Ensure that the CoCT and relevant authorities are held accountable for the health and safety impacts on the community. 4. Implement effective monitoring and enforcement mechanisms to prevent environmental degradation and health risks. 5. Consider alternative solutions, such as upgrading the existing plant or exploring new technologies that minimize environmental impacts. 6. A golden carrot of job creation has been hung in front of the Residents noses but with all previous developments it only has been empty promises and empty words to gain the trust of the community! <u>Paragraph 3: Answer</u> The South African Environmental Impact Assessment (EIA) Regulations and guidelines have formalised the NEMA process to address all the points listed above as well as a Public Participation Process (PPP) for the Basic Assessment Process. The PPP for the Macassar WWTW was undertaken in accordance with regulations 39 – 44 of the EIA Regulations and therefore complies with the legislative requirements. Additional guidance has been incorporated from the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP) Guideline document on Public Participation (March 2013). The current application is for the upgrade of the existing plant, therefore alternative properties/ sites cannot be considered. The 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. <u>Paragraph 4: Extract</u> <i>There are still many " Grey Areas" which must be answered by Zutari!</i> <i>Macassar has been made to be the preferred Dumping ground for the sewerage of the Helderberg, Wynlands, Khayetsha [Winelands, Khayelastsha] etc. No Sewerage plant's have been ever built in the White Communities so that there is fairness when it comes to the building and construction of Sewerage, WWT Plant's!</i> <i>This smacks of the Old Apartheid Developments and [Spatial] developments Where we Indigenous [Indigenous] Peoples were described as " Nie Mense,Half animal. Skollies and more derogatory names for a description of our Indigenous [Indigenous] " Coloured Peoples ". Everything is perfectly worked out to use these and specifically this community as dumping grounds for sewerage! waste! Why dump more Sewerage in the sea at Macassar Beach, are we still counted as half animal and less human by White developers!</i> <i>We are forever put on the nackburner [backburner] as far as environment and health! The CoCT takes no responsibility to developments as they have always done even when it comes to air-quality and our Residents have to wake-up to the smell of sewerage stench During normal hours of the Day!</i> <i>The CoCT prefers to just close their eyes, ears and noses to what we are experiencing in the Ward 109 Macassar Community! How much Raw Sewerage must our community take and how much more must our health suffer under the Dumping in our Esterhuizer and Macassar Beach! Why would it be expected of "The Black and Coloured Peoples, " Indigenous Peoples (Indigenous) Peoples to swim and wade in sewerage effluent? Is this our Destiny? Why are there no space or place within e.g.Paardevlei?. The principle of Dumping within Coloured Communities still is "OK " With our White Communities as long as they don't smell,see or hear about such problems! " let's sweep the problem to the so- called Coloured Communities as we always have done! This application is now being rushed after knowing about it since it's inception! The CoCT never considered our Macassar Ward109. This has been their way of conduct toward us for decades now.Wait till the last minute then rush and steamroll the "Poor Coloured" Community! If CoCT or Zutari knew for so long about this project from as far as 2016 why now rush the process and not informing us as an affected community! We were considered as not affected and interested!</i> Project number: 1001780, Final Letter to De Helderberg, Amended SAR,docx, 20200216, Rev 0 
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				ZUTARI <u>Paragraph 4: Answer</u> Zutari is appointed as an independent consultancy to undertake the Environmental Process related to the upgrade of the Macassar Wastewater Treatment Works, and Zutari does not have the mandate to comment on political related opinions and concerns. It is recommended that these opinions and concerns are directed through appropriate channels to the relevant Municipal or Local Government departments. The process currently being undertaken is to specifically seek environmental authorisation. Kind regards  Corlie Steyn Senior Environmental Practitioner Project number 1001780, Final Letter to Dr Hendrickse, Amended BMR.docx, 20250216, Rev 0 
8.1_40	Lauren King	CoCT: Senior Professional Officer: Environmental & Heritage Management – Eastern Region	Email Received Dated: 14/02/2025 Good day Corlie, I trust you are well. Please find attached consolidated comment and annexures from the City of Cape Town on the above application. Please acknowledge receipt of the attached comment via email for record keeping purposes. Kind regards, Lauren King Senior Professional Officer: Environmental & Heritage Management – Easter Region Environmental Management, Spatial Planning & Environment	Email Response Dated: 14/02/2025 Hi Lauren, Zutari acknowledge receipt of the consolidated comment. Kind regards Corlie Steyn



CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD

SPATIAL PLANNING AND ENVIRONMENT
ENVIRONMENTAL MANAGEMENT DEPARTMENT

Lauren King
Environmental & Heritage Management

T: 021 400 3034 / C: 072 253 5932
E: lauren.king@capetown.gov.za

2025-02-14

Zutari (Pty) Ltd
8 Voortrekker Road, corner of J. J. Pienaar Boulevard
Bellville
7535

By email: Corlie.Steyn@Zutari.com

Attention: Corlie Steyn

2nd DRAFT BASIC ASSESSMENT REPORT: PROPOSED MACASSAR WASTEWATER TREATMENT WORKS (WWTW) CAPACITY EXPANSION AND REFURBISHMENT OF ASSOCIATED INFRASTRUCTURE ON ERF 1205, AS WELL AS ERVEN 703 AND 708, MACASSAR (DEA&DP REF NO.: 14/3/3/1/A3/39/2054/24)

Reference is made to the 2nd Draft Basic Assessment Report (DBAR), dated January 2025, prepared by Zutari (Pty) Ltd for the proposed Macassar Wastewater Treatment Works capacity expansion and refurbishment of associated infrastructure on Erf 1205, Macassar and erven 703 and 708, Firove. 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: Water Demand Management, Regulation and Planning – Chanee Johnstone (Annexure A)

The previous comment from Water Demand Management, Regulation and Planning remain the same with no additional comments.

Water and Sanitation: Catchment, Stormwater and River Management – Gerhard Müller (Annexure B)

Catchment, Stormwater and River Management finds the proposed development desirable, in principle, subject to a number of technical requirements and conditions, listed in Annexure B, to be adhered to.

Please refer to Annexure B for the full comment from Catchment, Stormwater and River Management.

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

Having reviewed the 2nd DBAR, Environmental Health found no issues of health concern.

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

The Air Quality Management Unit finds the proposed development desirable, subject to the following:

- A Dust Management Plan and the Operational Odour Management Plan must be submitted to the City's Air Quality Management Unit and the Western Cape Department of Environmental Affairs and Development Planning for approval, prior to the commencement of construction activities for the site.

It should be noted that significant odour complaints have been submitted by residents of Macassar and surrounds in the recent past, regarding Hydrogen sulphide emissions from the existing sewerage treatment works. These complaints are justified. Mitigation measures to address these issues, therefore need to be incorporated into the Odour Management Plan, for which adequate resources must be made available, in order to enable the management authority of the WWTW to implement the mitigation measures going forward. Noting current budget constraints that are impacting on the ability to mitigate the present circumstances.

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

Economic Growth: Enterprise and Investment, Investment Facilitation – Lizelle Arendse (Annexure E)

It is noted that the Macassar WWTW currently primarily treats domestic and commercial sewage, and not really industrial sewage. It would be useful if the document could provide clarity on the type of sewage that would/could be treated at the plant after the upgrade, especially given the intention of decommissioning the Gordon's Bay WWTW (mentioned in the document). Investment Facilitation Branch has no further comments.

Environmental Management Department

Coastal Management – Daryl Colenbrander (Annexure F)

Upon review of the 2nd DBAR for the expansion of the Macassar WWTW, it appears that no coastal hazard risk assessment has been undertaken. This is of concern to Coastal Management for a number of reasons, as specified in Annexure F.

Coastal Management is of the view that the proposed development runs the risk of potential exposure to coastal processes, especially in the medium to long term. It is, therefore, advised that a coastal risk and hazard assessment be undertaken, which considers, amongst others, the following coastal processes, prior to any extension taking place:

- Coastal erosion caused by migrating estuary systems;
- Coastal erosion and/or temporary inundation events that may be caused by extreme sea level events;
- Sea level rise in the medium to long term; and
- A combination of these factors that may elevate the risk profile for this specific site.

Please refer to Annexure F for the full comment from Coastal Management.

Biodiversity Management – Julia Wood (Annexure G)

Biodiversity Management still 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 still remain and while responses to the previous comment from Biodiversity Management is noted, not all responses are deemed acceptable.

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

Environmental and Heritage Management: Heritage Section – Muneerah Solomon

The 2nd DBAR for the proposed revision to the previously authorised expansion works at the Macassar Wastewater Treatment Works (WWTW) 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 will impact on heritage resources, a Heritage Impact Assessment (HIA) was required that satisfies the provisions of Section 38(3) of the National Heritage Resource Act (NHRA). This HIA must have specific reference to a Palaeontological Impact Assessment.

The HIA, with specific studies, has been considered and endorsed by HWC on 10/12/2024. Thus, the Heritage Section has no objection to the proposal, subject to the following recommendations imposed by HWC:

- The Fossil Chance Finds Procedure must be included in the EI/Pr for the project;
- A Workplan should be in place so that collection of fossils can commence immediately, as and if required;
- A palaeontologist must be contracted to monitor the excavation work on the WWTW site;
- Disturbance of the dunes outside the project footprint must be minimised;
- An archaeologist must be contracted to monitor the grubbing (with a focus on the WWTW site and Paardevlei precinct);
- A Workplan should be in place so that collection of artefacts can commence immediately, as and if required;
- A decision will need to be taken during the monitoring process as to whether enough material is present to warrant retention of a collection, as well as the analysis, curation and reporting of the finds;
- At minimum a photographic record and description of the material and its context should be captured; and
- If any fossils, archaeological material or human burials are uncovered during the course of development works in the immediate vicinity must be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist (if not present on site at the time). Such heritage is the property of the state and may require excavation and curation in an approved institution.

Environmental and Heritage Management: Environmental Section – Lauren King

Having reviewed the 2nd DBAR, the Environmental Section takes note of the responses provided to the previous comment from this section. The required amendments to Environmental Management Programme, in light of comments received, is noted.

While the preceding comments from the Environmental Section have been addressed, it is noted that the concerns raised by Biodiversity Management have not been satisfactorily addressed in the updated report, as well as the Comments and Response Report. It is recommended that an in-person (preferably) consultation be arranged with Biodiversity Management, in order to address the questions and concerns raised. The outcome of such consultation must be included in the final report to be submitted to the competent authority for decision-making.

The Biodiversity Offset Agreement, dated 29/11/2024, as well as the Biodiversity Offset Strategy, dated December 2024, is noted. The Environmental Section is in support of the three sites (i.e. Options 1, 7 and 8) that were selected to achieve the required biodiversity offset targets. It is also noted that the exact extent of the area within Paardevelde (i.e. Option 7) is yet to be determined and will be subject to the outcome of discussions with the custodian of the land. The exact extent (if any)

Conclusion

Having reviewed the 2nd Draft Basic Assessment Report (DBAR) and circulated it to the relevant departments/branches, the proposed development is deemed desirable in principle, subject to the above technical requirements, concerns/questions and comments to be included and addressed in the final report to be submitted to the competent authority for decision making.

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.



D. Geagege
Manager: Environmental and Heritage Management
Environmental Management Department

Annexures:

Annexure A: Water and Sanitation: Technical Services – Chaneë Johnstone
Annexure B: Water and Sanitation: Catchment, Stormwater and River Management – Gerhard J. J. J. J.
Annexure C: Community Services and Health: Environmental Health – Claude Bylingiro
Annexure D: Community Services and Health: Specialised Environmental Health Services, Air Quality Management – Rabelani Gundula
Annexure E: Economic Growth: Enterprise and Investment, Investment Facilitation – Lizelle Arendse
Annexure F: Environmental Management: Coastal Management – Darryl Colenbrander
Annexure G: Environmental Management Department: Biodiversity Management – Julia Wood

CC: Department of Environmental Affairs and Development Planning (DEA&DP)
E-mail: deapadmin@westerncape.gov.za

Email Response Dated: 20/02/2025

Dear Lauren,

Please see attached the response from the project team pertaining to comments received from City of Cape Town on the Amended BAR for Macassar WWTW.

Below is the link to the new layout plans (also shared earlier this week – pertaining to Annexure 1)



20250218 Biodiversity comments

Please note that the Final BAR and CRR will be shared with the City of Cape Town and all I&APs once submitted to DEA&DP for decision-making.

Please reach out if anything is unclear.

Kind regards

Corlie Steyn



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20 February 2025

Me L King
Spatial Planning and Environment
Environmental Management Department
Email: lauren.king@capetown.gov.za

Dear Me King,

RE: Draft Basic Assessment Report: Proposed Macassar Wastewater Treatment Works
(WWTW) Capacity Expansion and Refurbishment of Associated Infrastructure on
Erven 1205, 703 And 708, Macassar (DE&DP Ref No.: 16/3/31/A3/39/2054/24)

Your email and letter dated 14 February 2025 has reference.

Thank you for making the time to raise comments during the second public participation process for the extension and refurbishment of the Macassar Wastewater Treatment Works (WWTW) on behalf of the City of Cape Town (CCT) and for providing consolidated comments from each Department on the amended BAR.

Zutari has reviewed all the comment in depth and provide the following comments pertaining to each Department. It is noted that "in principle" support has been given subject to technical requirements and issues raised. Please note that the second public participation process came to an end on 14 February 2025. In accordance with Regulation 19(1)(b) of the EIA Regulations, 2014 (as amended), the final BAR must be submitted within 140 days of receipt of the application by the Department of Environmental Affairs and Development Planning. The Final BAR and final Comments and Response Report (CRR) will be shared with you.

1. Water and Sanitation: Technical Services – Chaneë Johnson (Annexure A).

It is noted that no additional comment has been rendered.

2. Water and Sanitation: Bulk Service - Gerhardt Muller (Annexure B)

Please note that the second round of PPP was conducted to obtain comments in reference to the amendments of the Draft BAR. A public participation was conducted for a 30-day period from 16 October 2024-15 November 2024 with the aim to obtain comment on the Draft BAR. In previous correspondence the following was noted in terms of the Stormwater Design for the Macassar WWTW:

The Macassar WWTW stormwater drainage system will be implemented to accommodate the development requirements, topography, as well as the CoCT's stormwater management policy. The grade of the roads and landscaped areas around the structures are designed to ensure that water is directed off-site appropriately. The proposed stormwater drainage network is based on a dual stormwater system, consisting of a major and minor network, conveying stormwater generated on the site via pipes and overland flow routed into the concrete lined maturation pond, positioned along the southern most boundary of the Macassar WWTW site.

For details of the Roads and Stormwater design refer to enclosed drawings; 1001780-0000-DRG-CC-1012-T0 and 1001780-0000-DRG-CC-1002-T1.

Zutari (Pty) Ltd | Reg No: 1977002071007 | Board of Directors (070254) *NN Gengana (Chairperson), T Daba, *AC Dacosta, *YJ Hendricks,
T09 Mergo, *NLS Motisi, J Nkomo, *GT Rindke (Non-Executive Director)



3. **Community Services and Health: Environmental Health – Claude Bylingiro (Annexure C)**

The support from Community Services and Health: Environmental Health is noted and that no concerns related to the proposed development and no objection has been raised.

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

The support from Air Quality Management is noted and that the proposed development is desirable. The condition below has been added to the Final BAR and EMPr for the review of the DEA&DP.

The EA must prescribe conditions of authorisation to the effect that a Dust Management Plan and the operational Odour Management Plan will be required to and the Western Cape Department of Environmental Affairs & Development Planning for approval, prior to the commencement of construction activities for the site. We thus call upon the EA competent authority to endorse the EA to this effect.

5. Economic Growth: Enterprise and Investment, Investment Facilitation – Lizelle Arendse (Annexure E)

It is noted that the Investment Facilitation Branch has no further comments. The type of sewage that would be treated at the Macassar WWTW after the refurbishment will include domestic and commercial sewage. The Gordon's Bay WWWW also receives domestic and commercial sewage and will be permanently diverted to Macassar WWTW in the future.

6. Coastal Policy Development and Management Programmes – Darryl Colenbrander (Annexure F)

We acknowledge your comment on the second Draft BAR and although it would have been preferred to receive your inputs as part of the first round of PPP, please find herewith responses from the project team below.

Points 1-3 of your comment is noted in reference to the view that there might be potential exposure to coastal process. Please refer to the project history below for clarification on the matter.

On the 07 July 2016, the Department of Environmental Affairs and Development Planning (DEADP) issued an Environmental Authorisation (EA) to the City of Cape Town approving the proposed upgrade and expansion of the Macassar Wastewater Treatment Works (WWTW) and associated infrastructure. The EA requires that the system be designed to ensure that the WWTW provides treatment services to the surrounding community. Construction has started in 2018. However, due to the time that has passed since the approval in 2016, new design engineers have been appointed to finalise the detailed design. The 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 sea. The EA requires that the design be revised to ensure that the WWTW complies with the proposed revision to the design upgrades will require the clearance of more than 1ha of indigenous vegetation, which includes Endangered Cape Flats Dune Strandveld vegetation. Therefore, Listing Notice 1, Activity 12 and 27 and Listing Notice 3 Activity 12 is being applied for. The current EA of the WWTW is valid, however previous EA process considered the required legislative requirements pertaining to the discharge of effluent into the sea. The EA requires that the design engineers comply with the discharge to the coastal protection zone. The necessary Impact Assessments were done

at the time. The current proposal does not entail a new development, rather the expansion of an existing facility. Please refer to the short reference from the BAR that was done at the time:

The Coastal Protection Zone (seaward of the coastal edge line delineated by the City of Cape Town)

The development of bulk infrastructure (including WWTWs) is regarded as undesirable within the Coastal Protection Zone. However, "Essential activities required for the environmental management of the coastal area" are desirable. The proposed development will improve the quality of the discharge released to the Eerste River and prevent future sewage overflows/spills – in this way the proposed development may protect the surrounding environment from pollution and may thus support the environmental management of the surrounding coastal area.

It is noted that there is a request for a coastal risk and hazard assessment.

The Macassar Treatment works received environmental authorisation on 7 July 2017. For this initial application all sensitivities were assessed at the time. The current application pertains to the refurbishment of the facility. The proposed revision to the design upgrades will require the clearance of more than 1ha of indigenous vegetation, which includes Endangered Cape Flats Dune Strandveld vegetation. Therefore, Listing Notice 1, and 27 and Listing Notice 3 Activity 12 is being applied for.

For this purpose, a screening tool report was generated (making use of the National Screening Tool), as per legislation and the sensitivities identified for the site are included in Table 1 below.

Table 1: Environmental sensitivities picked up by the national screening tool.

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme		X		
Animal Species Theme		X		
Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme				X
Civil Aviation Theme			X	
Defence Theme				X
Plant Species Theme		X		
Terrestrial Biodiversity Theme	X			

A coastal risk and hazard assessment was not identified by the National Screening Tool as a sensitivity and therefore a separate study has not been conducted. The following studies formed part of the Basic assessment:

1. Agricultural Impact Assessment
2. Archaeological and Cultural Heritage Impact Assessment
3. Palaeontology Impact Assessment
4. Terrestrial Biodiversity Impact Assessment
5. Aquatic Biodiversity Impact Assessment
6. Plant Species Assessment (Ecology)
7. Animal Species Assessment (Part of the Biodiversity assessment)
8. Defence Statement

Furthermore, please note that in terms of Section 38 of the NEM: ICMA, the DEA&DP is the provincial lead agency for coastal management in the Western Cape as well as the competent authority for the administration of the coastal areas.

Careful consideration has gone into the impacts of flood lines on the new infrastructure where portions of the works are elevated such that the top water level and top of concrete levels of the process units sits above the flood line levels of concern. The higher elevation of portions of the works will also aid in mitigating against some of the concerns relating to the dynamic coastal environment. Due to the

changing nature of the coastal zone, continuous monitoring of the interaction of the facility with the coastal zone will be undertaken as part of routine monitoring of the expanded WWTW. Any changes to the coastal zone which threaten the integrity of the WWTW infrastructure (incl. perimeter fence, and perimeter road) will need to be addressed as these occur and mitigation measures contained in the EMP will need to be implemented to ensure any actions do not negatively impact the environment. Careful consideration has already gone into elevating portions of the new works where the top water level and top of concrete levels of the process units ensuring that they are not flooded in the event of a 1:50 year flood event. The treated effluent channels which are located around the maturation ponds also sits higher than the 1:50 year flood line.

7. Environmental Management Department Biodiversity Management – Julia Wood (Annexure G)

Please refer to Appendix 1 of this letter.

8. Environmental and Heritage Management: Heritage Section – Muneerah Solomon

It is noted that no objection has been raised. The mitigation measures below have been captured in the Final EMP:

- The Fossil Chance Finds Procedure must be included in the EMP for the project;
- A Workplan should be in place so that collection of fossils can commence immediately, as and if required;
- A palaeontologist must be contracted to monitor the excavation work on the WWTW site;
- Disturbance of the dunes outside the project footprint must be minimised;
- An archaeologist must be contracted to monitor the grubbing (with a focus on the WWTW site and Paardevlei precinct);
- A Workplan should be in place so that collection of artefacts can commence immediately, as and if required;
- A decision will need to be taken during the monitoring process as to whether enough material is present to warrant retention of a collection, as well as the analysis, curation and reporting of the finds;
- At minimum a photographic record and description of the material and its context should be captured; and
- If any fossils, archaeological material or human burials are uncovered during the course of development works in the immediate vicinity must be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist (if not present on site at the time). Such heritage is the property of the state and may require excavation and curation in an approved institution.

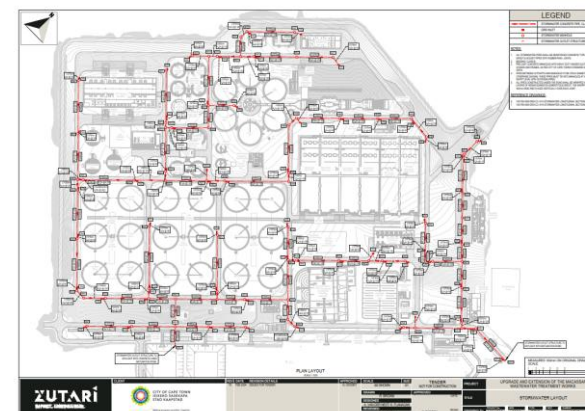
9. Environmental and Heritage Management: Environmental Section – Lauren King

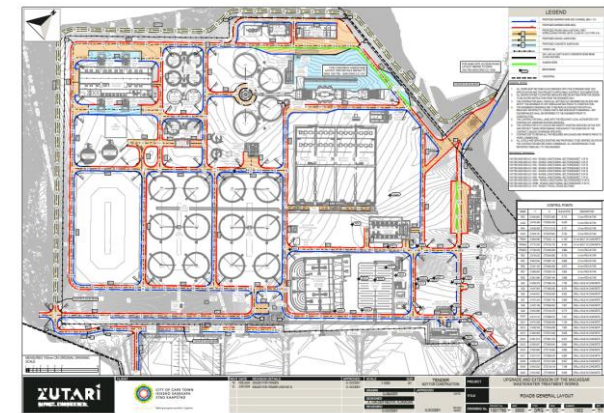
All the comments have been addressed, and it is noted that the proposed development is deemed desirable in principle, subject to the above technical requirements, concerns/questions and comments made. Please note that the Final BAR and CRR will be shared with the City of Cape Town and all I&APs once submitted to DEA&DP for decision-making. In accordance with Regulation 19(1)(b) of the EIA Regulations, 2014 (as amended), the final BAR must be submitted within 140 days of receipt of the application by the Department.

Kind regards

Corlie Steyn
Senior Environmental Practitioner

Project number: 1001780; Final letter CCT; Amended BAR.docx; 20250220; Rev:0





APPENDIX 1

Environmental Management Department Biodiversity Management – Julia Wood (Annexure G)

Nr.	Comment	Response
1.	The proposed guard house and the security hut are both inside the Macassar East Conservation Area. How big will each footprint be, including any associated parking areas and infrastructure to service the ablution facilities?	The proposed guardhouse building (i.e., building at the head/entrance of the WWTW) footprint is approximately ~55-60m². The Guardhouse will connect to the on-site foul sewer system where the sewage will be conveyed to the inlet works and be treated as part of the process at the WWTW. No parking is provided at the guardhouse as this building serves as a control point and vehicles are meant to pass through after signing in. Alternative provisions for parking are made within the WWTW footprint for parking of site security who will work in the guardhouse. The proposed security hut building (i.e., building located after the bridge crossing in Tie Road) footprint is approximately ~50-55m². This area is made up of the following ~25-30m² for the building, 10-12m² for the parking and 12m² for the conservancy tank. Sewage from the security hut will be disposed of into a conservancy tank which shall be serviced by the WWTW plant staff as and when required via a honey sucker truck which will dispose of sewage at the Macassar WWTW. The conservancy tank is a below ground installation with the access cover sitting above ground for emptying. Please note the Security Hut was requested to be included in the project scope by the Biodiversity Branch in particular the Biodiversity Area Co-ordinator and the Biodiversity Projects and Support Programme Manager, reference is made to previous meetings and correspondence between the Wastewater Operations team and the aforementioned Biodiversity personnel. As the project team we understood the request was to manage public access via the treatment works access road to the dunes, beach and greater estuary area. The security hut will be manned with guards and will be managed by the City of Cape Town Biodiversity Branch and its intention is to mitigate against crime in this area as well as eliminate illegal activities that take place along Tie road leading to the WWTW and surrounding dune areas.
2.	Both the guard house and security hut must have electricity, potable water and ablution	Please refer to the following attached drawings:

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Nr.	Comment	Response
1	The proposed perimeter road on the northern boundary of the waste water treatment works falls within the existing Conservation Area on the site layout plan. This must be moved into the development footprint within Erf 1205	The proposed perimeter road on the northern side of the WWTW currently falls outside of Erf 1205 and falls on Erf 703 (owned by the City of Cape Town) where the land is zoned as Agricultural. It is noted from the CCT GIS Map viewer that the area is indicated as a protected area however it is also indicated that proclamation as a protected area has not been completed. It is further noted that the road does fall within a CBA and that the 'protected area' status on the GIS layer aligns with the CBA boundary. It is therefore our understanding that although the area is indicated as a conservation area, the proclamation process has not been completed and the road along the northern boundary therefore falls within a CBA rather. Furthermore, the design of the WWTW has been optimized to allow the plant to be fully located within Erf 1205. Adjustments will be made to portions of the road such that the gravel road is positioned over the area currently shown as the 'Washdown Area'. Majority of the road will therefore fall onto Erf 1205, however, the gravel road slip connecting onto Tie road will still fall on Erf 703. This is to ensure public has free access to the Macassar beach without entering the WWTW. The Washdown area will be relocated to an already constrained site layout and the affected services such as the fencing and internal roads will be adjusted to accommodate the relocation of the gravel road. Lastly, note that the perimeter road closely follows the route as proposed by the heritage specialist. Detailed layouts and updated maps will be included in the final bar submission which includes the changes as described above. The perimeter road provides an access and recreational function and would need to be managed as part of the protected area to be declared as part of the off-set process.
2	The proposed perimeter road is proposed on a very steep dune at the northern most point. This will be extremely difficult to construct and result in a substantial impact on the natural vegetation and dune face in this area due to required cutting and stabilisation to accommodate the road. The road needs to be placed at the base of this dune to avoid this impact, including long term maintenance	The expanded WWTW has been carefully designed to make optimal use of the available space. As reflected in the environmental sensitivity maps, the entire footprint utilises the area of the old sludge lagoons; however, this space is insufficient to accommodate the entire facility, necessitating the clearance of indigenous vegetation (resulting in the need for an offset process).

Nr.	Comment	Response
	burden that could further impact on the adjacent nature reserve.	Regarding the perimeter road, due to the limited available space, it is unlikely that the perimeter road can be placed at the base of the dune. The design will consider relocating portions of the road so far as possible to ensure least amount of impact. We acknowledge the impact that this could have on the dune and its vegetation, and measures have been included in the EMPri to minimise impacts during the construction phase as much as possible. To reduce the maintenance burden and risks to the adjacent natural area (conservation are post offset process), monitoring and mitigation measure have been included in the EMPri for the operational phase.
3	Within the development footprint, it appears that there will need to be extensive removal of the dunes to create a level surface for the development. How will this interface with the surrounding dunes and vegetation in the offset area and conservation area? The concern is that this would result in the need to cut back extensively into the dunes in the conservation area. This impact cannot be accommodated within the conservation footprint and the design needs to make allowance for the entire disturbance footprint to be accommodated within the developable footprint.	The proposed development footprint will necessitate the removal of 7 hectares of high-sensitivity vegetation, predominantly comprising dunes. While there will be a temporary impact on the dunes in areas with steep slopes, the Environmental Management Programme (EMPri) includes comprehensive measures to rehabilitate disturbed areas, effectively mitigating this impact. Furthermore, as noted during the site visit with Clifford Dorse, Cape Dune Strandveld has a high potential for successful rehabilitation. This further reduces the risk of ongoing issues arising from construction near the dunes, ensuring that long-term ecological integrity can be maintained.
4	Where will the topsoil and search and rescue material of the CBA vegetation inside the development be move too?	It is recommended that topsoil and rescued vegetation from the footprint area be used for passive rehabilitation within the Offset Areas, including Option 1 (Erf 1205 next to the WWTW) as well as Option 2 (if available for offsetting purposes). Alternatively, rescued vegetation can be used for the stabilisation of any cut sand dunes and slopes that require rehabilitation and/or species can be relocated to the Stellenbosch Botanical Garden (as recommended by Nick Helme, Botanical Surveys).
5	Have all the edge effects originating from the planned development, inclusive of its operational phase, been considered? Where will any and all overflows (especially in the event of unforeseen operational failures) be directed?	According to the Operational Phase Ecological Impact Assessment in the Draft BAR (page 65) and the suggested mitigation is "avoidance or minimising is the only real option". Strict edge effect management will be important and no disturbance beyond the WWTW project proposal should be permitted and strictly monitored. Contractors must have severe penalties for any non-compliance.

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8.1_40.1	Chanee Johnstone	CoCT: Senior Professional Officer: Integrated Planning: Water Demand Management, Regulation and Planning: Technical Services – Water and Sanitation Directorate	Lauren King From: Chanee Johnstone Sent: Thursday, 06 February 2025 17:20 To: Lauren King Subject: RE: Erf 1205, Macassar; Erven 703 & 708, Firgrove 2nd DBAR for Macassar WWTW Expansion - Comments due by: 7 February 2025 Hi Lauren, No changes to the previous comment from W5- nothing additional. Kind regards Chanee Johnstone Senior Professional Officer: Integrated Planning Water Demand Management, Regulation and Planning Technical Services - Water and Sanitation Directorate 4th floor, Water and Sanitation Head Office, C/O Mike Pienaar Blvd and Voortrekker Road, Bellville Tel: 021 400 5244 Email: chanee.johnstone@capetown.gov.za Website: www.capetown.gov.za Customer feedback: Customer Feedback - IR Development-related Water and Sanitation matters: waterinfo@capetown.gov.za CCT Contacts CCT Media and News Report a fault Account Queries  CITY OF CAPE T ISIXEKO SASEK. STAD KAAPSTAD From: Lauren King <Lauren.King@capetown.gov.za> Sent: Thursday, 06 February 2025 16:07 To: Roauwen Thomas <Roauwen.Thomas@capetown.gov.za>; Mishka Jalim <Mishka.Jalim@capetown.gov.za>; Ruan Mills <Ruan.Mills@capetown.gov.za>; Clifford Dorse <Clifford.Dorse@capetown.gov.za>; Charmaine Oxtoby <Charmaine.Oxtoby@capetown.gov.za>; Gregg Oelofse <Gregg.Oelofse@capetown.gov.za>; Darryl Colenbrander <Darryl.Colenbrander@capetown.gov.za>; Johan van Wyk <Johan.vanWyk@capetown.gov.za>; Bulk Water Info <BulkWater.Info@capetown.gov.za>; Chanee Johnstone <Chanee.Johnstone@capetown.gov.za>; Mckaylin Adonis <Mckaylin.Adonis@capetown.gov.za>; Water Info <Water.Info@capetown.gov.za>; Rosina Lesoetsa <Rosina.Lesoetsa@capetown.gov.za>; Anela Kondlo <Anela.Kondlo@capetown.gov.za>; Charise de Villiers <Charise.deVilliers@capetown.gov.za>; Lizelle Arendse <Lizelle.Arendse@capetown.gov.za>; Claude Byllingiro <Claude.Byllingiro@capetown.gov.za>; Zimasa Matho <Zimasa.Matho@capetown.gov.za>; Marcel Justin Woodman <Marcel.Woodman@capetown.gov.za>; Christopher Thando Norman <Christopher.Norman@capetown.gov.za>; Gerhard Muller <GerhardtRushby.Muller@capetown.gov.za>; Wayne Davids <WayneAlvin.Davids@capetown.gov.za>; Haniyyah Jacobs <Haniyyah.Jacobs@capetown.gov.za> Cc: Azanne Van Wyk <Azanne.VanWyk@capetown.gov.za>; Stephanie Taljaard <Stephanie.Taljaard@capetown.gov.za> Subject: RE: Erf 1205, Macassar; Erven 703 & 708, Firgrove 2nd DBAR for Macassar WWTW Expansion - Comments due by: 7 February 2025 Importance: High	Please refer to entry 8.1_40
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8.1_40.2	Gehardt Müller	Head: Catchment Management: Eastern Region: Catchment Stormwater and River Management	 CITY OF CAPE TOWN ISIXEKO SASEKAPA STAD KAAPSTAD BULK SERVICES DEPARTMENT WATER AND SANITATION DIRECTORATE Gehardt Müller Head: Catchment Management: East Region Catchment Stormwater and River Management T: 021 400 1341 M: 071 164 5471 E: GehardtRushby.Muller@capetown.gov.za For Attention: Lauren King (Senior Professional Officer: Environmental & Heritage Management) & Stephanie Taljaard (Environmental Professional: Environmental and Heritage Management) Date: 7 February 2025 ERF 1205, MACASSAR, ERVEN 703 & 708, FIGROVE - 2ND DBAR FOR MACASSAR WWTW EXPANSION From a Catchment, Stormwater & River Management branch perspective, comments are provided as follows: We as the Catchment, Stormwater & River Management branch support the DRAFT BASIC ASSESSMENT REPORT: ERF 1205, Macassar, Erven 703 & 708, Figrove 2nd DBAR for Macassar WWTW Expansion, dated April 2024. The following information is required to be submitted to this branch for further review: 1. A detailed Stormwater Management Plan (SMP) must be submitted to CSRM for approval. This plan must address stormwater quality, maintenance requirements and detailed design on stormwater management on site in line with the City's Sustainable Urban Drainage Policy and the City of Cape Town management of urban Stormwater impact Policy, 2009. 2. The SMP must be approved and engineering infrastructure designed accordingly before construction commences. 3. The Stormwater plan must also indicate the 1:50 and 1:100 yr floodlines, particularly around the maturation ponds and stormwater outlet to the Eerste River. 4. Any buffer zones between the development and wetlands or estuary to be indicated on the site development plan. 5. Seepage from the maturation ponds toward the Eerste River be addressed to mitigate polluted water from entering the river through the ground. 6. Onsite stormwater runoff needs to be attenuated, treated and tie into the river with appropriate scour, erosion and flood protection. Scour and erosion protection between the maturation ponds and the Eerste River to be addressed as well (see Figure 1). 7. Maintenance Management Plan on how the new stormwater infrastructures will be managed needs to form part of the submitted Stormwater Management Plan. WATER & SANITATION HEAD OFFICE 8 VOORTREKKER ROAD, CNR OF MIKE PIENAR BOULEVARD, BELLVILLE 7535 PRIVATE BAG X98, BELLVILLE, 7535 www.capetown.gov.za/firstwater  Making progress possible. Together.	Please refer to entry 8.1_40
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Figure 1 Maturation pond embankment scour protection, and groundwater seepage toward the Eerste River to be addressed in the SMP.

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

Yours sincerely,

**Gehardt
Muller**

Digitally signed by
Gehardt Muller
Date: 2025.02.07
17:40:21 +02'00'

Gehardt Muller

Head: Catchment Management: East

WATER & SANITATION HEAD OFFICE
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8.1_40.3	Claude Alberto Bylingiro	Environmental Health Practitioner	 CITY OF CAPE TOWN ISIIXEKO SASEKAPA STAD KAAPSTAD COMMUNITY SERVICES AND HEALTH ENVIRONMENTAL HEALTH Claude Alberto Bylingiro Environmental Health Practitioner T: 021 4444826 F: 086 576 1406 E: clauda.bylingiro@capetown.gov.za ATTENTION: Lauren King06/02/2025 Re: Erf 1205, Macassar, Erven 703 & 708, Firgrove 2nd DBAR for Macassar WWTW Expansion Dear sir / Madam, Your request for a review and comments of the second Draft Basic Assessment Report for the proposed revision of the previous authorised expansion works at Macassar Wastewater Treatment Works situated on Erf 1205 Macassar as well as Erf 703 and 708 Firgrove, refers: After reviewing the report, this department found no issue of health concern. Yours faithfully,  Claude Bylingiro Environmental Health Practitioner STRAND ADMINISTRATIVE BUILDING C/O FAGAN STREET & MAIN ROAD, STRAND www.capetown.gov.za STRAND ADMINISTRATIEWE GEBOU Making progress possible. Together.	Please refer to entry 8.1_40
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8.1_40.4	Rabelani Gundula	CoCT: Senior Air Quality Practitioner	 CITY OF CAPE TOWN ISIXEKO SASEKAPA STAD KAAPSTAD COMMUNITY SERVICES AND HEALTH SPECIALISED ENVIRONMENTAL HEALTH AIR QUALITY MANAGEMENT UNIT Rabelani Gundula Senior Air Quality Practitioner T: +27 21 400 4025 E: Rabelani.Gundula@capetown.gov.za Ref: 33/7/3 - 615-1 13 February 2025 MEMORANDUM Attention: Lauren King Environmental / Management Department Spatial Planning & Environment Directorate COMMENTS ON THE UPDATED DRAFT BASIC ASSESSMENT REPORT FOR THE MACASSAR WASTEWATER TREATMENT WORKS EXPANSION ON ERF 1205, MACASSAR, ERVEN 703 & 708, FIRGROVE, WESTERN CAPE The Air Quality Management (AQ/1) Unit has scrutinised the updated Draft Basic Assessment Report, together with the attached amended Environmental Management Programme Report (EIPr) with the submission date of 10 January 2025, for the proposed expansion of the Macassar Wastewater Treatment Works (WWTV) ERF 1205, Macassar, Erven 703 & 708, Firgrove, Western Cape and we wish to submit the following comments: 1. This document must be read and reviewed with our previous comments signed by the City's Air Quality Officer on 14 November 2024 entitled "COMMENTS ON THE UPDATED DRAFT BASIC ASSESSMENT REPORT FOR THE MACASSAR WASTEWATER TREATMENT WORKS EXPANSION ON ERF 1205, MACASSAR, ERVEN 703 & 708, FIRGROVE, WESTERN CAPE" Ref: 33/7/3-615. 2. The City's Air Quality Management (AQ/1) Unit supports that the Environmental Authorisation (EA) should be granted to the applicant with the following conditions: 2.1 The EA must prescribe conditions of authorisation to the effect that a Dust Management Plan and the operational Odour Management Plan will be required to be submitted to the City's Air Quality Management Unit and the Western Cape Department of Environmental Affairs & Development Planning for approval, prior to the commencement of construction activities for the site. We thus call upon the EA competent authority to endorse the EA to this effect. In this regard it must be noted that significant odour complaints have been submitted by residents of Macassar and surrounds in the recent past, regarding Hydrogen sulphide emissions from the existing sewerage treatment works. These complaints are justified. Mitigation measures to address these issues thus need to be incorporated into the odour management plan, for which adequate resources must be made to enable the WWTV management to implement the mitigation measures going AIR QUALITY MANAGEMENT 246 VOORTREKERS ROAD, VASCO 7480 www.capetown.gov.za  Making progress possible. Together.	Please refer to entry 8.1_40
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			2 forward. Noting current budget constraints that are impacting on the ability to mitigate the present circumstances. 3. The Head: Specialised Environmental Health and/or City's Air Quality Officer reserves the right to call for additional information should it be deemed necessary in terms of the applicable legislative provisions regulating air quality matters. Ian Gildenhuys Digitally signed by Ian Gildenhuys Date: 2023.02.13 13:30:11 +0200 Ian Gildenhuys Head: Specialised Environmental Health Services Air Quality Officer	
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8.1_40.5	Lizelle Arendse	CoCT: Professional Officer: Investment Facilitation Branch Economic Development & Investment Department, Economic Growth	Lauren King From: Lizelle Arendse Sent: Friday, 07 February 2025 16:19 To: Lauren King Subject: RE: Erf 1205, Macassar; Erven 703 & 708, Firgrove 2nd DBAR for Macassar WWTW Expansion - Comments due by: 7 February 2025 Good afternoon Lauren, The 2nd Draft Basic Assessment Report [DBAR] for proposed revision to the previously authorised expansion works of the Macassar Wastewater Treatment Works (WWTW) on Erf 1205, Macassar; as well as Erven 703 & 708, Firgrove refers. It is noted that the Macassar WWTW currently primarily treats domestic and commercial sewage, and not really industrial sewage. It would be useful if the document could provide clarity on the type of sewage that would/could be treated at the plant after the upgrade, especially given the intention of decommissioning the Gordon's Bay WWTW (mentioned in the document). Otherwise, the Investment Facilitation Branch has no comments. Kind regards Lizelle Arendse Professional Officer: Investment Facilitation Branch Economic Development & Investment Department, Economic Growth T: 021 444 9389 E: lizelle.arendse@capetown.gov.za CCT Web Contacts Media Report a fault Accounts Enquiries Relating to Investment Support - Email: Investment.Facilitation@capetown.gov.za For General Business Related Enquiries Contact: Business.Support@capetown.gov.za Or the help desk / 021 417 4043 / Web: www.capetown.gov.za/businesshub  CITY OF CAPE TOWN ISIXEKO SASEKAPA STAD KAAPSTAD Making progress possible. Together. From: Lauren King <Lauren.King@capetown.gov.za> Sent: Thursday, 06 February 2025 16:07 To: Roauwhen Thomas <Roauwhen.Thomas@capetown.gov.za>; Mishka Jalim <Mishka.Jalim@capetown.gov.za>; Ruan Mills <Ruan.Mills@capetown.gov.za>; Clifford Dorse <Clifford.Dorse@capetown.gov.za>; Charmaine Oxtoby <Charmaine.Oxtoby@capetown.gov.za>; Gregg Oelofse <Gregg.Oelofse@capetown.gov.za>; Darryl Colenbrander <Darryl.Colenbrander@capetown.gov.za>; Johan van Wyk <Johan.vanWyk@capetown.gov.za>; Bulk Water Info <BulkWater.Info@capetown.gov.za>; Chaneel Johnstone <Chaneel.Johnstone@capetown.gov.za>; Mckaylin Adonis <Mckaylin.Adonis@capetown.gov.za>; Water Info <Water.Info@capetown.gov.za>; Rosina Lesoetsa <Rosina.Lesoetsa@capetown.gov.za>; Anela Kondlo <Anela.Kondlo@capetown.gov.za>; Charise de Villiers <Charise.deVilliers@capetown.gov.za>; Lizelle Arendse <Lizelle.Arendse@capetown.gov.za>; Claude Byllingiro <Claude.Byllingiro@capetown.gov.za>; Zimasa Matho <Zimasa.Matho@capetown.gov.za>; Marcel Justin Woodman <Marcel.Woodman@capetown.gov.za>; Christopher Thando Norman <Christopher.Norman@capetown.gov.za>; Gerhard Muller <GerhardTushby.Muller@capetown.gov.za>; Wayne Davids <WayneAlvin.Davids@capetown.gov.za>; Haniyyah Jacobs <Haniyyah.Jacobs@capetown.gov.za> Cc: Azanne Van Wyk <Azanne.VanWyk@capetown.gov.za>; Stephanie Taljaard <Stephanie.Taljaard@capetown.gov.za> 1	Please refer to entry 8.1_40
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8.1_40.6	Darryl Colenbrander	CoCT: Head: Coastal Policy Development & Management Programmes	 CITY OF CAPE TOWN ISIXEKO SASEKAPA STAD KAAPSTAD SPATIAL PLANNING AND ENVIRONMENT ENVIRONMENTAL MANAGEMENT DEPARTMENT Darryl Colenbrander Head: Coastal Policy Development and Management Programmes T: +27 (0)21 487 2355 F: +27 (0)21 424 9897 E: Darryl.Colenbrander@cape.gov.za TO: Lauren King Senior Professional Officer: Environmental & Heritage Management – Eastern Region Environmental Management, Spatial Planning & Environment Directorate RE: Erf 1205, Macassar, Erven 703 & 708, Firgrove 2nd DBAR for Macassar WWTW Expansion DATE: 7th February 2025 Dear Lauren, Upon review of the 2nd DBAR for the expansion of the Macassar WWTW it appears that no coastal hazard risk assessment has been undertaken. This is of concern to the Coastal Management Branch (CMB) for the following reasons: 1) The footprint, in particular the southern corner of the proposed expansion of the WWTW, is in close proximity to the dynamic interface of the coastline as well as an estuary river mouth. 2) The current WWTW has a relatively low elevation above MSL. 3) The proposed expansion of the WWTW will result in substantial infrastructure being located in close proximity to the dynamic coastal environment and which will be of a 'permanent' nature. With the aforementioned factors in mind, the CMB is of the view that there may be potential for exposure to coastal processes, especially in the medium to long term. On this basis the CMB advises that prior to any extension taking place, a coastal risk and hazard assessment is undertaken and which considers, amongst others, the following coastal processes: - Coastal erosion caused by migrating estuary systems - Coastal erosion and/or temporary inundation events that may be caused by extreme sea level events - Sea level rise in the medium to long term - A combination of these factors that may elevate the risk profile for this specific site. Kind regards, Darryl Colenbrander Head: Coastal Policy Development and Management Programmes CC: Meinderjan Rebel Pr Eng Senior Professional Officer: Coastal Engineering and Design GOOD HOPE SUB-COUNCIL BUILDING 7TH FLOOR, 44 WALK STREET, CAPE TOWN, 8001, SOUTH AFRICA. PO BOX 16548, VLAERBERG 8018, SOUTH AFRICA. www.cape.gov.za ISAKHWO SEKHUNGANA LASE-GOOD HOPE GOEBIE HOOF-SUBRAADSGEROU Making progress possible. Together.	Please refer to entry 8.1_40
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Julia Wood
Cliff Dorse
Keith Wiseman

CoCT: Spatial Planning and Environment

[illegible]

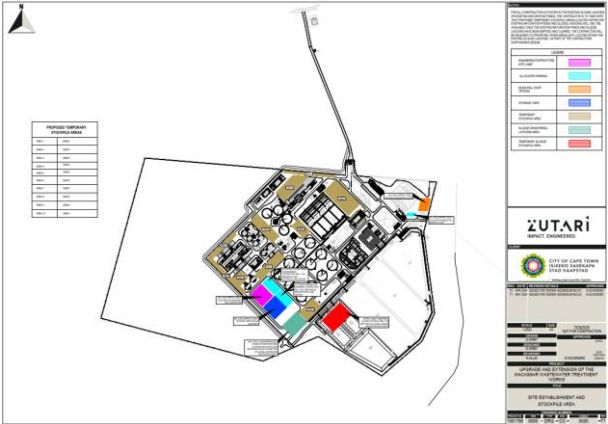
Corlie Steyn

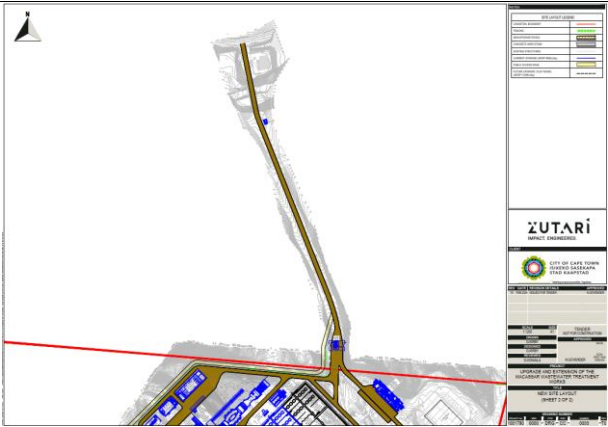
Email Received Dated: 17/02/2025

Hi Corlie
We are not available until 9h00 on Friday morning.
I see the issue is the road, please send us the latest layout so we can make an informed decision.
Regards
Julia

Email Response Dated: 17/02/2025

Dear Julia,
Noted that you are busy until Friday.
Please see attached the latest and amended layout.
The project team will aim to have answers to the rest of the comments to you by midday tomorrow or latest COB tomorrow.
Kind regards
Corlie Steyn



			
			Email Response Dated: 18/02/2025 Dear Julia and Cliff, Email 1: Please see attached the response from the Zutari project team (Annexure 1 attached to this email) to the comments raised during the second round of PPP with specific reference to the Annexure G of the consolidated comment as received from the City of Cape Town on 14 February 2025. Please note that due to the legislated timeframes we must submit the Final BAR, inclusive of your revised comments, this coming Friday on 21 February. The Final BAR, CRR and revised layout will also be shared with all I&APs. (Please note due to size limit of the more emails with annexures) Please note the following requirements from DEA&DP pertaining to revised comments from Biodiversity Cape Town (Italics comment from DEA&DP): Botanical Impacts: 1. <i>The City of Cape Town's Biodiversity Management Department's comment on the draft BAR indicated "The perimeter road on the norther boundary of the WWTW falls within the existing Conservation Area on the site layout plan. This must be moved into the development footprint on Erf No. 1205." The Environmental Assessment Practitioner's ("EAP's) response indicates that the road falls outside Erf 1205 and falls on Erf No. 703 (owned by the City of Cape Town) and the property is zoned Agriculture. According to the City of Cape Town's GIS Map viewer, the area is indicated as a Protected Area and Critical Biodiversity Area. It is therefore the EAP's understanding that although the area is indicated as a Protected Area, the proclamation process has not been completed and the road thus falls within a CBA. Further, amendments will be made to the layout of the WWTW to ensure it is fully located on Erf No. 1205 and the gravel road be located on the area shown as the "washdown area". The majority of the road will be on Erf No. 1205, but a slip connecting onto a tie road will still fall on Erf No. 703 I order to ensure the public has access to the Macassar beach without entering the WWTW</i> 2. <i>A revised comment must be obtained from the City of Cape Town: Biodiversity Management Department in this regard. Comments have been obtained from CapeNature regarding the proposed offset. However, please ensure that comments are obtained from the City of Cape Town's Biodiversity Management Department regarding the Offset Strategy Report.</i> In reference to point 1 above: The project team has since revised the layout, and the amendments referred to are reflected in the final layout as shared with you yesterday. Relating to the matter of the Protected Area and CBA, it has been confirmed that the proclamation process has not been finalised, however it is in process. This status is now reflected in the Final BAR. In reference to point 2 above: Comments regarding the Biodiversity Offset Report, please refer to Appendix G.8.5 – G.8.7 (this will be attached to the final BAR) to show

				the comprehensive involvement of your branch in the Offset Report. Can you please confirm as per requirement from DEA&DP (point 2 above) that these annexures are your comments regarding the Offset Report. Please let us know if you have any questions. Kind regards Corlie Steyn
				Email Response Dated: 18/02/2025 Dear Julia and Cliff, Email 2: Please see below a link to the potable network and main access road network. (Size is permitting email correspondence)  20250218 Biodiversity comments Attached to this email is Appendix G.8.5 – G.8.7 as explained in email 1. Kind regards Corlie Steyn
				Email Response Dated: 19/02/2025 Dear Julia and Cliff, Can we ask that you please provide us with your revised comment today, so that the project team can review and amend, if necessary, tomorrow. We must finalise the submission by COB tomorrow as we are submitting on Friday to make the legislated timeframes, and the Final BAR must be uploaded on our portal to be shared with all I&APs. Please reach out if you have any questions. Kind regards Corlie Steyn
			Email Received Dated: 19/02/2025 Dear Corlie We have not had the time to go through the response to our last comments in detail and the BMB's comments as last submitted still stand. However regarding the two points below – please see our inputs in green: Regards Cliff Cliff Dorse Head: Conservation Services Biodiversity Management Branch Environmental Management Department Spatial Planning and Environment Directorate BMB response: We note that no portions of the perimeter road is on 703. This Erf is reserved for the Environment management Department for biodiversity management purposes. It was never available for development and is in the process of gazettement as Nature Reserve. It is noted that there will be a slip road on 703. In the latest plan it appears that there will be gatehouse infrastructure on 703 as well? See below 	

In addition, is the image below the placement of the access gatehouse? This appears not to be in the ideal position for access control. How was this location selected? This should be placed in closer proximity to the bridge



In reference to point 2 above: Comments regarding the Biodiversity Offset Report, please refer to Appendix G 8.5 – G 8.7 (this will be attached to the final BAR) to show the comprehensive involvement of your branch in the Offset Report. Can you please confirm as per requirement from DE&DP (point 2 above) that these annexures are your comments regarding the Offset Report.

Am not too sure what is required here? The comments are on our letterhead, so have indeed come from us. We also prepared the attached letter to October 2024. This was not sufficient.



CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD

**SPATIAL PLANNING & ENVIRONMENT
ENVIRONMENTAL MANAGEMENT**

Julia Wood

Manager: Biodiversity Management Branch

T: 021 444 1760 F: 021 444 3531 M: 0844649153
E: julia.wood@capetown.gov.za

Attention: Stephen van Staden and Samantha-Leigh Daniels

Scientific Terrestrial Services
29 Arden Road West
Oriel, Johannesburg, Gauteng
2007

30 October 2024

Dear All

RE: BMB comment on proposed offset options for the expansion of the Macassar WWTWs

The Biodiversity Management Branch (BMB) of the City of Cape Town (the City) values the opportunity to engage on the proposed offset requirements for the Macassar Wastewater Treatment Works (WWTW) expansion project. The Macassar WWTW is located within the City's Macassar East Nature Reserve and the sound functioning of this plant is critical to the ecological integrity of the Eerste River estuary and the neighbouring Helderberg Marine Protected Area.

The BMB hereby confirm that the three preferred offset areas proposed in the Technical Memorandum dated 25 October 2024 are within our Protected Area Expansion vision and are identified as priority areas on the fine scale conservation plan for the Cape Town area, the BioNet. Below are comments with regards to each of the proposed offset areas:

- **Option 1 – onsite mitigation:**
The proposed onsite offset option of approximately 25 ha of extremely high quality Cape Flats Dune Strandveld on Ptn 0 of Erf 1205 to be conserved is fully supported. This area will be consolidated into the Macassar East Nature Reserve and will be managed and proclaimed as Nature Reserve in terms of section 23 of the National Environmental Management: Protected Areas Act (the NEM: PAA). The BMB can confirm that we have sufficient operational resources in place to manage this area to the standards required of a Nature Reserve.
- **Option 7 - The Paardevlei wetland ecological link to the coast:**
With recent changes in the overarching Paardevlei development precinct, a Paardevlei Nature Reserve will be established and proclaimed in terms of the NEM: PAA. Critical to the viability of this new reserve is a meaningful ecological link to the coast and to the Helderberg Marine Protected Area. The land is owned by the City and a potential corridor could encompass a portion of ST794-0 RE, ST791-5 and ST791-4 RE. The BMB is in full support of any land made available for this ecological corridor and extension to the Paardevlei Nature Reserve to contribute to the required offset. The CCT: Human Settlements Department is the project management team responsible for the Paardevlei project and they need to be engaged to confirm what land could be made available for this purpose. Operational budget will need to be sourced in order to manage any offset area. A Strategic Management Framework (SMF) budget request will need to be submitted by the applicant supported by the BMB.

BIODIVERSITY MANAGEMENT BRANCH: 1st FLOOR, OLD ABATTOIR BUILDING, 53 BEEKLEY ROAD, MAITLAND 7505
P.O. BOX 11, MAITLAND 7404
www.capetown.gov.za

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			2 • Option 8 - A portion of the CCT's Burgherspost offset land bank The City is in the process of purchasing over 600 ha of Endangered Swartland Granite Fynbos and Atlantis Sand Fynbos in the landscape conservation initiative known as the Dassenberg Coastal Catchment Partnership. The deeds of sale have been signed and the payment has been made. The subdivision and transfer process is underway. The City is busy purchasing this Critical Biodiversity Area as a development facilitation land bank for City projects. The BMB would be in full support for it being used to mitigate for any residual offset requirements for the Macassar WWTW, however some operational budget would need to be secured. A Strategic Management Framework (SMF) budget request will need to be submitted by the applicant supported by the BMB. Please continue to liaise with us with regards to the outcome of the offset considerations and do not hesitate should there be a need for any additional information. Yours faithfully, Julia Wood Digitally signed by Julia Wood Date: 2025.02.19 10:33 084230142202 Julia Wood Manager: Biodiversity Management Branch Letter: OFFSET APPLICATIONS 05/2024	
		Email Received Dated: 19/02/2025 Dear Corlie You only sent this yesterday afternoon and I have just returned from leave today. There are lots of critical things happening and this is a very tight time frame. However we will see what I can do. Please can you send me the sphapefiles of the amended layout so I can open it in Arc Map? Kind regards Cliff	Email Response Dated: 19/02/2025 Dear Cliff, Please see attached the kmz that has been used for the final layout. We only received comments from DEA&DP and yourselves on the last day of our second round of PPP which was last Friday: 14 Feb, and we must submit the Final BAR on Friday 21 February to make the legislated timeframes otherwise the application will lapse we will have to start again. (This is a BAR process, we had to ask for extension of time re the Biodiversity Offset, hence the very short timeframes resulting in enormous pressure on everyone due to legislated timeframes). In accordance with Regulation 19(1)(b) of the EIA Regulations, 2014 (as amended), the final BAR must be submitted within 140 days of receipt of the application by the Department. The comment from DEA&DP states that we must include a revised comment from CCT Biodiversity (email below) We have also addressed the additional comments we received from Biodiversity on 14 February in Appendix 1 (attached) Please reach out if anything is unclear. Kind regards Corlie Steyn	
		Email Received Dated: 19/02/2025 Good Afternoon Julia,		

		I trust you are well. We have received all comments from various CoCT departments as part of the 2nd PPP. However, we received an instruction regarding Biodiversity Branch's comments, see snapshot below. While the preceding comments from the Environmental Section have been addressed, it is noted that the concerns raised by Biodiversity Management have not been satisfactorily addressed in the updated report, as well as the Comments and Response Report. It is recommended that an in-person (preferably) consultation be arranged with Biodiversity Management, in order to address the questions and concerns raised. The outcome of such consultation must be included in the final report to be submitted to the competent authority for decision-making. Our Consultant (Zutari) reached out to you to arrange a meeting, but I understand you were unavailable this week. You mentioned that you were okay with us emailing our responses and providing the requested information. Your comments are attached in Annexure G, along with Zutari's Responses (Appendix 1), which were sent through yesterday. As you are aware, the Macassar WWTW Upgrade project has all eyes on it at the moment, with it being tracked on the MPP. We have a deadline approaching this Friday 20/02/2025. We would greatly appreciate it if you could expedite your final comments on our responses by 12h00 tomorrow 20/02/2025. This will ensure that we have enough time to incorporate any necessary changes into the final BAR and associated documents. It is crucial for us to demonstrate to DEA&DP that all comments received have been adequately addressed upon submission. Thank you for your attention to this matter. Kind Regards Marcel Woodman Principal Engineer Projects & Implementation Wastewater Branch Bulk Services Department Water & Sanitation Directorate	
			Email Response Dated: 20/02/2025 Dear Cliff and Lewine, Thank you for making the time early this morning to meet and to discuss the matter below. Comment received from DEA&DP on 14 February 2025 asked specifically that a revised comment must be obtained from the City of Cape Town: Biodiversity Management Department (BMD) in reference to the quoted section below: Botanical Impacts: 1. <i>The City of Cape Town's Biodiversity Management Department's comment on the draft BAR indicated "The perimeter road on the norther boundary of the WWTW falls within the existing Conservation Area on the site layout plan. This must be moved into the development footprint on Erf No. 1205." The Environmental Assessment Practitioner's ("EAP's) response indicates that the road falls outside Erf 1205 and falls on Erf No. 703 (owned by the City of Cape Town) and the property is zoned Agriculture. According to the City of Cape Town's GIS Map viewer, the area is indicated as a Protected Area and Critical Biodiversity Area. It is therefore the EAP's understanding that although the area is indicated as a Protected Area, the proclamation process has not been completed, and the road thus falls within a CBA. Further, amendments will be made to the layout of the WWTW to ensure it is fully located on Erf No. 1205 and the gravel road be located on the area shown as the "washdown area". The majority of the road will be on Erf No. 1205, but a slip connecting onto a tie road will still fall on Erf No. 703 in order to ensure the public has access to the Macassar beach without entering the WWTW.</i> Based on this morning's meeting via MS Teams, it is Zutari's understanding that the BMD is satisfied that the final layout [as shared with your department on 17 February, email attached and layouts attached again for ease of reference] has been amended to ensure that the perimeter road on the northern side of the WWTW is now fully located

within Erf 1205. Apart from the gravel road slip connecting onto Tie Road (which falls on Erf 703), the majority of the perimeter road is located on Erf 1205. This is to ensure the public has free access to the Macassar beach without entering the WWTW. Zutari understands from our meeting that BMD is also satisfied with this layout.

Furthermore, we confirm that the BMD is satisfied with the placement of the guardhouse, and notes the reasons given by the technical team as to why it has been placed in the current location.

Zutari acknowledges the BMD's concern relating to cutting into the dune at the guardhouse (canopy on eastern side of guardhouse) and that extra care must be taken to minimise any such cutting or ideally to avoid cutting into the dune entirely.

Zutari acknowledges the concerns raised with the regards to the location of the Security Hut and await final confirmation from BMD if relocation is required.

We acknowledge that the BMD wishes for the footprint to remain "the footprint" and that all edge effects and cutting into dunes must be avoided where possible and if not avoidable, to be minimised. In this regard, the EMPr includes measures to address this matter as per our previous correspondence (Annexure 1) of 18 February 2025.

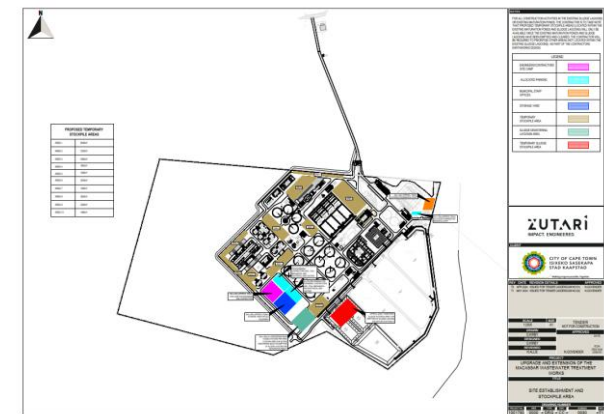
We trust that you find the above satisfactory and are awaiting your confirmation of the above and of the position of the security hut (after 1 pm today).

Kind regards,

Corlie Steyn

RE: TIA&S Meeting Minutes: Biosecurity Second Comment to be included in Final SAR - Submission date: 07 February 2025
Appendix B1.2 - SITE ESTABLISHMENT AND STOCKPILE AREA Layout
Appendix B1.1 (DMS-CC-002) New Site Layout.pdf
Appendix B1.2 (DMS-CC-002) New Site Layout.pdf





Email Received Dated: 20/02/2025

Dear Corlie

Following our meeting this morning, Lewine and I conducted a quick site visit to assess the location of the proposed security hut.

The Biodiversity Management Branch can confirm that we are indeed supportive of the final layout and that no section of the perimeter road is on Erf 703. Erf 703 is reserved for the Environment Management Department (EMD) for biodiversity management purposes and is in the process of being gazetted as a Nature Reserve. It is noted and supported that there will be a short slip road and access control building for the Waste Water Treatment Works partially on Erf 703 and Erf 707 (both reserved for EMD and Biodiversity). The main access control building to the works encroaches on a rather steep dune to the east. As noted below, care must be taken not to destabilise this dune as it will greatly increase the disturbance to the natural vegetation and the sand movement may also threaten the infrastructure in future.

With regards to the guardhouse near the bridge for access control (Erf 708 – also reserved for EMD and Biodiversity), we can confirm that it is indeed correctly located in the layout plan. We are pleased that there will be no fencing along the access road through the nature reserve but would request if a small section of 2 meter high clear-view fencing, or similar, could be included from the end of the bridge to the back corner of the guardhouse to ensure pedestrians have to walk past the control point and to ensure the staff manning the gate house. This <20 meter section is indicated by the red line below:



Can we please also get clarity on which line functions will be responsible for long-term maintenance of the guardhouse, Tie Road and the perimeter road?

Email Response Dated: 20/02/2025

Dear Cliff,

Thank you for the prompt response, it is much appreciated.

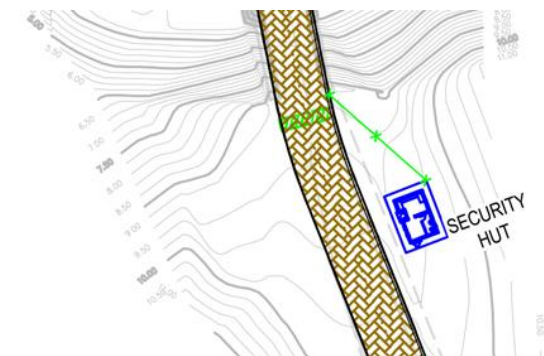
Zutari has liaised with Mornay De Vos (District Manager: Operations Southeast) and the following is noted:

1. Operations Wastewater Branch has agreed in principle to the long-term maintenance of the security hut along the access road (Tie Road) and the perimeter road. They have also agreed to the long-term maintenance of the access road, however, have noted that this is a City resource and support may be required from Biodiversity Management Branch and other directorates within the City of Cape Town (i.e., Urban Mobility)
2. The security hut to be manned by guards supplied by the Biodiversity Management Branch, and general housekeeping being managed by the Biodiversity Management Branch

It is recommended that Biodiversity Management Branch liaises with Operations Wastewater Branch further to finalise particulars of the above-mentioned arrangement and that this is concluded outside of the Basic Assessment process.

Zutari can also confirm that the request for the 2-meter-high fencing can be accommodated from the end of the bridge to the back corner of the guardhouse on the layout.

This <20-meter section has been amended on the final layout plan (snippet below) and the project description of the Final BAR has been updated to reflect this change.



Kind Regards
Corlie Steyn

		Thank you and please let us know if you require any additional information. Kind regards Cliff Cliff Dorse Head: Conservation Services Biodiversity Management Branch Environmental Management Department Spatial Planning and Environment Directorate	
		Email Received Dated: 20/02/2025 Thanks Corlie, noted with thanks. Cliff	
		Email Received Dated: 20/02/2025 Hello Corlie Thank you for copying me on this request. Could you please share the communication received from DEA&DP on 14 February, mentioned below? Regards Keith Wiseman Manager: Environmental Compliance	Email Response Dated: 20/02/2025 Dear Keith, Please the DEA&DP comment attached. Kind regards Corlie Steyn  Western Cape Government Department of Environmental Affairs and Development Planning Rondine Isaacs Directorate: Development Management, Region 1 Rondine.Isaacs@westerncape.gov.za Tel: 021 483 4098 REFERENCE: 16/3/31/A3/39/2054/24 DATE: 14 February 2025 The Municipal Manager City of Cape Town Water and Sanitation Directorate Bulk Services Department 8 Voortrekker Road BELLVILLE 7535 Attention: Mr. Keith Olsen E-mail: Keith.Olsen@capetown.gov.za Dear Sir COMMENT ON THE REVISED DRAFT BASIC ASSESSMENT REPORT ("BAR") FOR THE PROPOSED UPGRADE AND EXPANSION OF THE MACASSAR WASTE WATER TREATMENT WORKS ("WWTW") AND ASSOCIATED INFRASTRUCTURE. - The abovementioned document as received by this Department via electronic mail correspondence on 14 January 2025, and this Department's acknowledgement of receipt letter dated 22 January 2025, respectively, refer. - This Directorate has considered the revised draft BAR and has the following comments: - The Directorate's comments on the draft BAR have been addressed and a Biodiversity Offset Strategy Report dated December 2024, has been compiled by Scientific Terrestrial Services, which outlines the findings and recommendations of the offset strategy. - Although the SG 21-digit codes of the proposed offset sites have been provided, the co-ordinates of the respective offset sites have not been provided. Please ensure that the co-ordinates are included in the final BAR. - Comments have been obtained from CapeNature regarding the proposed offset. However, please ensure that comments are obtained from the City of Cape Town's Biodiversity Management Department regarding the Offset Strategy Report. Biodiversity Offset: This Directorate notes that a Signed Biodiversity Offset Agreement for the proposal has been provided by the City of Cape Town. Heritage Impacts: It is noted that Heritage Western Cape has issued a decision on 13 December 2024 regarding the Heritage Impact Assessment for the proposed development. Please ensure that Heritage Western Cape's decision letter is appended to the final BAR.  www.westerncape.gov.za Department of Environmental Affairs and Development Planning

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8.1_41	Rondine Isaacs	Department of Environmental Affairs and Development Planning	Email Received Dated: 14/02/2025 Dear Mr. Keith Olsen, Attached please find the correspondence from this Directorate concerning Macassar WWTW. <i>Vriendelike Groete / Kind Regards / Ngomkhulu Umbuliso,</i> DEADP EIA ADMIN Department of Environmental Affairs and Development Planning Western Cape Government Website: www.westerncape.gov.za/eadp	Email Response Dated: 21/02/2025



Department of Environmental Affairs and Development Planning
Rondine Isaacs
Directorate: Development Management (Region 1)
Rondine.Isaacs@westerncape.gov.za | Tel: 021 453 4098

REFERENCE: 16/3/31/A3/39/2054/24
DATE: 14 February 2025

The Municipal Manager
City of Cape Town
Water and Sanitation Directorate
Bulk Services Department
8 Voortrekker Road
BELLVILLE
7535

Attention: Mr. Keith Olsen

E-mail: Keith.Olsen@cape.gov.za

Dear Sir

COMMENT ON THE REVISED DRAFT BASIC ASSESSMENT REPORT ("BAR") FOR THE PROPOSED UPGRADE AND EXPANSION OF THE MACASSAR WASTE WATER TREATMENT WORKS ("WWTW") AND ASSOCIATED INFRASTRUCTURE.

- The abovementioned document as received by this Department via electronic mail correspondence on 14 January 2025, and this Department's acknowledgement of receipt letter dated 22 January 2025, respectively, refer.
- This Directorate has considered the revised draft BAR and has the following comments:
 - The Directorate's comments on the draft BAR have been addressed and a Biodiversity Offset Strategy Report dated December 2024, has been compiled by Scientific Terrestrial Services, which outlines the findings and recommendations of the offset strategy.
 - Although the SG 21-digit codes of the proposed offset sites have been provided, the co-ordinates of the respective offset sites have not been provided. Please ensure that the co-ordinates are included in the final BAR.
 - Comments have been obtained from CapeNature regarding the proposed offset. However, please ensure that comments are obtained from the City of Cape Town's Biodiversity Management Department regarding the Offset Strategy Report.
 - Biodiversity Offset:**
This Directorate notes that a Signed Biodiversity Offset Agreement for the proposal has been provided by the City of Cape Town.
 - Heritage Impacts:**
It is noted that Heritage Western Cape has issued a decision on 13 December 2024 regarding the Heritage Impact Assessment for the proposed development. Please ensure that Heritage Western Cape's decision letter is appended to the final BAR.



www.westerncape.gov.za
Department of Environmental Affairs and Development Planning



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Waterford Precinct
Century City
Cape Town
South Africa
P.O. Box 404
Cape Town
8000
Dated: 18/02/2025
zutari.com

21 February 2025

Attention: Directorate: Development Management (Region 1 and Region 2)
Director: Development Management: Mr Zahir Toefy
Western Cape Government
Department of Environmental Affairs and Development Planning
Cape Town, 8000

Dear Mr Toefy

Submission: Final BAR and EMPr:
Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure
Refurbishment
REFERENCE: 16/3/31/A3/39/2054/24

Background

Zutari has been appointed to assist the applicant, the City of Cape Town (CCT), with the following application: REFERENCE: 16/3/31/A3/39/2054/24: Macassar Wastewater Treatment Works, Capacity Extension and Associated Infrastructure Refurbishment

On the 07 July 2016, the Department of Environmental Affairs and Development Planning (DE&DP) issued an Environmental Authorisation (EA) to the City of Cape Town approving the proposed upgrade and expansion of the Macassar Wastewater Treatment Works (WWTW) and associated infrastructure on the basis that they were necessary to continue to provide essential wastewater treatment services to the surrounding community.

The main purpose of this new proposed project (subject of this letter) is to implement the aforementioned authorised upgrade of the WWTW, the construction of which has already commenced. However, due to the time that has passed since the approval in 2016, new design engineers have been appointed to finalise the detailed design. The 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. This project is on the Mayor's Priority Programme to implement as soon as possible. The proposed revised design upgrade constitutes listed activities in terms of the EIA Regulations, 2014 (as amended). Written authorisation is therefore required from the competent authority, DE&DP, prior to the undertaking of the said activities. This determination is based on the following:

- The proposed revision to the design upgrades will require the clearance of more than 1ha of indigenous vegetation, which includes Endangered Cape Flats Dune Strandveld vegetation. Therefore, Listing Notice 1, Activity 27 and Listing Notice 3 Activity 12 is being applied for.
- Furthermore, an application is made to amend the previous EA dated 7 July 2017 to include the new project description.
- A Biodiversity Offset speciality has been appointed and this process formed part of this Basic Assessment Process. The reason for the development of a Biodiversity Offset Strategy for the Macassar WWTW is to align with the principles and requirements of the 2023 Biodiversity Offset Guidelines. This strategy addresses the residual impacts of the development on the EN

Zutari (Pty) Ltd (Reg No 197700371007) (Board of Directors (BOD) (2024) "Nkomo (Chairperson), T. Dube, "AC Dube, "YU Hendricks,
T. Mingo, "NEX, Mingo, "Nkomo, "YU Hendricks (Non-Executive Director)



2.4 Botanical Impacts:

2.4.1 The City of Cape Town's Biodiversity / Management Department's comment on the draft BAR indicated "The perimeter road on the northern boundary of the WWTW falls within the existing Conservation Area on the site layout plan. This must be moved into the development footprint on Erf No. 1205."

2.4.1.1 The Environmental Assessment Practitioner's ("EAP's") response indicates that the road falls outside Erf 1205 and falls on Erf No. 703 (owned by the City of Cape Town) and the property is zoned Agriculture. According to the City of Cape Town's GIS / map viewer, the area is indicated as a Protected Area and Critical Biodiversity Area. It is therefore the EAP's understanding that although the area is indicated as a Protected Area, the proclamation process has not been completed and the road thus falls within a CBA. Further, amendments will be made to the layout of the WWTW to ensure it is fully located on Erf No. 1205 and the gravel road be located on the area shown as the "washdown area". The majority of the road will be on Erf No. 1205, but a slip connecting onto a tie road will still fall on Erf No. 703 in order to ensure the public has access to the Macassar beach without entering the WWTW.

2.4.1.2 A revised comment must be obtained from the City of Cape Town's Biodiversity / Management Department in this regard.

2.4.2 The EAP's responses to the City of Cape Town's comments related to the extent of impacts on the dunes located in the conservation area on Erf No. 703 needs to be more detailed. A description and indication of the possible extent (area on Erf Np. 1205 which will be affected) must be provided along with mitigation measures to be included in the Environmental / Management Programme ("EIP").

2.5 General:

2.5.1 The map depicting the veld conditions and associated ecological conditions of Offset Option 8 on page 11 of the revised draft BAR is indicated as "Option 9". Please ensure that this is rectified to refer to Option 8.

2.5.2 The Comments and Responses Report indicates the perimeter road will closely follow the route proposed by the heritage specialist and detailed layouts and updated maps will be included in the final BAR. Please ensure that the layouts and maps are included in the final BAR.

2.5.3 Please ensure that the Curriculum Vitae of the Environmental Assessment Practitioner is appended to the final BAR.

2.5.4 Please ensure that only the final version of the EIP is appended to the final BAR.

2.5.5 The EIP must include all of the specialists recommended mitigation measures as well as the mitigation measures provided by the organs of state.

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Department of Environmental Affairs and Development Planning

ZUTARI

Cape Flats Dune Strandveld, a threatened vegetation type which will be impacted on as part of the refurbishment of the Macassar WWTW.

- The Biodiversity Offset Agreement is appended to the Final BAR as Appendix G.8.4
- An extensive public participation process has been undertaken, and the PP Report is appended to the Final BAR as Appendix F.

Please receive with this submission the:

- 1) Final and Amended Application Form
- 2) Final BAR
- 3) Final EMP

Please refer to Annexure 1 attached in this email: Response to DEA&DP letter dated 14/02/2025 and appended to this letter as part of the review of the Final BAR.

Yours faithfully

Corlie Steyn
Principle Environmental Consultant

Copies:

kath.olsen@capetown.gov.za
christopher.norman@capetown.gov.za
marcel.woodman@capetown.gov.za
azanne.vanerk@capetown.gov.za

1001780_Cover letter_Final BAR and Amended Application_Macassar.docx, 2025/02/21, Rev 0



COMMENT ON THE REVISED DRAFT DEA&DP COMMENT: BASIC ASSESSMENT REPORT ("BAR") FOR THE PROPOSED UPGRADE AND EXPANSION OF THE MACASSAR WASTE WATER TREATMENT WORKS ("WWTW") AND ASSOCIATED INFRASTRUCTURE.

14/02/2025

No	DEADP Comment	Response
1.	The abovementioned document as received by this Department via electronic mail correspondence on 14 January 2025, and this Department's acknowledgement of receipt letter dated 22 January 2025, respectively, refer.	Noted, thank you for the comments.
2.	This Directorate has considered the draft BAR and has the following comments: 2.1 The Directorate's comments on the draft BAR have been addressed and a Biodiversity Offset Strategy Report, dated December 2024, has been compiled by Scientific Terrestrial Services, which outlines the findings and recommendations of the offset strategy. 2.1.1 Although the SG 21-digit codes of the proposed offset sites have been provided, the co-ordinates of the respective offset sites have not been provided. Please ensure that the co-ordinates are included in the final BAR. 2.1.2 Comments have been obtained from CapeNature regarding the proposed offset. However, please ensure that comments are obtained from the City of Cape Town's Biodiversity Management Department regarding the Offset Strategy Report.	2.1/Noted and thank you for the confirmation. 2.1.1The Final BAR has been amended and the co-ordinates have been included. 2.1.2 Comments from the City of Cape Town's Biodiversity Management Department regarding the Offset Strategy Report has been obtained – refer to Appendix G.8.5, G.8.6 and G.8.8. It can be seen in these two annexures that the City of Cape Town's Biodiversity Management Department has rendered in depth comments on the Offset Strategy Report and that these comments were addressed and incorporated into the final Offset Strategy Report to their satisfaction. Please refer to the email (Appendix G.8.7) for confirmation from the Independent Offset.

	2.6 Public Participation Process: 2.6.1 Please provide proof of the Public Participation Process being conducted for the revised draft BAR circulated as part of the application phase. This will include (but is not limited to): • Proof that the revised draft BAR was placed on the website of Zutari and at the Ilacassar Public Library; • Proof that the revised draft BAR was made available to registered I&APs; • A Comments and Responses Report, indicating all the comments received from I&APs on the revised draft BAR and the responses thereto; and • A complete list of registered I&APs. 2.6.2 Please ensure that all comments are adequately addressed prior to the submission of the final BAR. 2.7 Declarations by applicant, EAP and specialists: You are hereby reminded to include the signed declarations from the applicant, EAP and specialists in the final BAR. 3. 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Please note that mitigations measures from the Biodiversity and Heritage specialist pertaining to the dunes have also been captured in the EMP: • No-go areas: • The foreshore area, the estuary, all undeveloped vegetation surrounding the working area, and any other sensitive areas identified by the ECO must be regarded as no-go areas. • Land clearing • Land-clearing activities shall only be undertaken in areas strictly required for the proposed development, and to prevent unnecessary disturbance of vegetation and dunes outside of the development footprint. </td></tr></table>		Specialist that the comments have been incorporated. 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2.2 Biodiversity Offset: This Directorate notes that a Signed Biodiversity Offset Agreement for the proposal has been provided by the City of Cape Town.	Correct.																	
2.3 Heritage Impacts: It is noted that Heritage Western Cape has issued a decision on 13 December 2024 regarding the Heritage Impact Assessment for the proposed development. Please ensure that Heritage Western Cape's decision letter is appended to the final BAR.	The final decision of Heritage Western Cape is appended to the Final BAR as Appendix E.1.4 and captured in the CRR.																	
2.4 Botanical Impacts: 2.4.1 The City of Cape Town's Biodiversity Management Department's comment on the draft BAR indicated "The perimeter road on the northern boundary of the WWTW falls within the existing Conservation Area on the site layout plan. This must be moved into the development footprint on Erf No. 1205."	The design of the WWTW has been optimized to allow the plant to be fully located within Erf 1205 and the road has been moved. The Final Layout Plan is appended to the Final BAR have been shared with the City of Cape Town. The majority of the road therefore falls onto Erf 1205, however, the gravel road slip connecting onto the road falls onto Erf 703. This is to ensure public has free access to the Macassar beach without entering the WWTW.																	
The Environmental Assessment Practitioner's (EAP's) response indicates that the road falls outside Erf 1205 and falls on Erf No. 703 (owned by the City of Cape Town) and the property is zoned Agriculture. According to the City of Cape Town's GIS Map viewer, the area is indicated as a Protected Area and Critical Biodiversity Area. It is therefore the EAP's understanding that although the area is indicated as a Protected Area, the proclamation process has not been completed and the road thus falls within a CBA. Further, amendments will be made to the layout of the WWTW to ensure it is fully located on Erf No. 1205 and the gravel road be located on the area shown as the	The project team has since revised the layout, and the amendments referred to are reflected in the final layout. The design of the WWTW has been optimized to allow the plant to be fully located within Erf 1205 and the road has been moved. The Final Layout Plan is appended to the Final BAR have been shared with the City of Cape Town. Please refer to the appendix B.1.1 – B.1.3, as well as the updated maps in the Final BAR, where all necessary adjustments have been incorporated.																	
'washdown area'. The majority of the road will be on Erf No. 1205, but a slip connecting onto a be road will still fall on Erf No. 703 in order to ensure the public has access to the Macassar beach without entering the WWTW	Relating to the matter of the Protected Area and CBA, it has been confirmed that the proclamation process has not been finalised, however it is in process. This status is reflected in the Final BAR.																	
2.4.1.2 A revised comment must be obtained from the City of Cape Town, Biodiversity Management Department in this regard.	Please refer to Appendix E.15.1 of the BAR and Entry No 8.1.40.7 (Final revised comment from the City of Cape Town's Biodiversity Management Department (BMD) dated 20/02/2025) and captured in the Comments and Response Report. Zutari engaged (BMD) via a meeting, emails and various phone calls. The BMD also conducted a site visit and confirmed they are indeed in support of the final layout plan and that no section of the perimeter road is on Erf 703. Erf 703 is reserved for the Environment Management Department (EMD) for biodiversity management purposes.																	
2.4.2 The EAP's responses to the City of Cape Town's comments related to the extent of impacts on the dunes located in the conservation area on Erf No. 703 needs to be more detailed. A description and indication of the possible extent (area on Erf No. 1205 which will be affected) must be provided along with mitigation measures to be included in the Environmental Management Programme (EMP).	The project team has amended the project layout to ensure that almost the entire perimeter road is located on erf 1205 and has thus moved further away from the dune area in question, mitigating the impact. Refer Section G.4.3 of the Final BAR for the description and please also refer to Appendix E.15.1 of the BAR and the Entry No 8.1.40.7 of the CRR (Final and revised comment from the City of Cape Town's Biodiversity Management Department (BMD) dated 20/02/2025) in this regard. With regards to mitigating and managing the potential impact on the dune, note the following measures that have been included in the EMP. These mitigation measures have also been shared with the City of Cape Town's Biodiversity Branch. Please note that mitigations measures from the Biodiversity and Heritage specialist pertaining to the dunes have also been captured in the EMP: • No-go areas: • The foreshore area, the estuary, all undeveloped vegetation surrounding the working area, and any other sensitive areas identified by the ECO must be regarded as no-go areas. • Land clearing • Land-clearing activities shall only be undertaken in areas strictly required for the proposed development, and to prevent unnecessary disturbance of vegetation and dunes outside of the development footprint.																	

		- Stabilisation of any cut sand dunes and slopes outside the approved development site should be undertaken using only the rescued plant material from site and should be undertaken by the appointed botanical Search and Rescue botanist, ecologist or other suitably qualified person. - Watercourse management: - If it is necessary to pump water out of the waterbody before infilling, the water may be released into the surrounding dunes and vegetation, provided that the water is not contaminated and released in such a way that will allow the water to disperse and infiltrate into the surrounding land without creating erosion channels or gulleys. - Protection of fauna and flora: - The movement of construction workers, vehicles and machinery should be restricted to the demarcated construction/ work area to avoid disturbance to fauna in the surrounding area. Vehicles and machinery may not drive through surrounding undeveloped vegetation or dunes. - Workers involved with land clearing and earthmoving must be cognisant that dune moles may be encountered on site (up to a depth of 1-2 meters below surface) during earthmoving and may be scooped up with earth material during bulldozing and excavating. Moles (and other fauna) so encountered should be provided with opportunity to vacate the area. - Cultural / Heritage resources: - Disturbance of the dunes outside the project footprint must be minimised. - Operational Phase - A management plan to ensure the survival of the important vegetation and protected flora on site is implicit to the expansion development of the WWTW. This plan should include control over movement through the dunes by humans and their stock. The area should have a carefully designed system of paths (and guides) for educational access. - The public access road must be regularly assessed to monitor any potential erosion of the road and surrounding dunes. - Slope stability mitigation measures will be investigated as part of the technical design.
2.5	General:	This final BAR has been amended.

2.5.1 The map depicting the veld conditions and associated ecological conditions of Offset Option 8 on page 11 of the revised draft BAR is indicated as "Option 9". Please ensure that this is rectified to refer to Option 8. 2.5.2 The Comments and Responses Report indicates the perimeter road will closely follow the route proposed by the heritage specialist and detailed layouts and updated maps will be included in the final BAR. Please ensure that the layouts and maps are included in the final BAR. 2.5.3 Please ensure that the Curriculum Vitae of the Environmental Assessment Practitioner is appended to the final BAR. 2.5.4 Please ensure that only the final version of the EMPy is appended to the final BAR. 2.5.5 The EMPy must include all of the specialists recommended mitigation measures as well as the mitigation measures provided by the organs of state. Public Participation Process 2.6.1 Please provide proof of the Public Participation Process being conducted for the revised draft BAR circulated as part of the application phase. This will include (but is not limited to): - Proof that the revised draft BAR was placed on the website of Zushi and at the Macassar Public Library; - Proof that the revised draft BAR was made available to registered IAPs; - A Comments and Responses Report, indicating all the comments received from IAPs on the revised draft BAR and the responses thereto; and - A complete list of registered IAPs.	This has been amended during the first round of the PP and has since been changed on all layout maps. The CV has been appended as Annexure P13. The Final version of the EMPy is appended to the Final BAR as Annexure H.1. The Final EMPy has been amended to include all of the specialists recommended mitigation measures as well as the mitigation measures provided by the organs of state. Please refer to Annexure F of the BAR.
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