

# UPDATED BASIC ASSESSMENT REPORT FOR THE PROPOSED ESTABLISHMENT OF A FUEL STATION ON ERF 38333, MILNERTON, CAPE TOWN

**Erf 38333, Milnerton, Cape Town**

Prepared for: Richmond Park Development Company  
(Pty) Ltd

Authority Ref: 16/3/3/6/7/1/A1/18/3114/20

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## BASIS OF REPORT

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## EXECUTIVE SUMMARY

### 1. INTRODUCTION AND BACKGROUND INFORMATION

The applicant, the Richmond Park Development Company (RPDC), on behalf of the registered landowner, the Richmond Park Communal Property Association, is proposing to develop a fuel station on Erf 38333, located off Plattekloof Road, Milnerton, Cape Town. The proposed fuel station would be located within the Southern Precinct of the existing Richmond Park. A locality map and site layout plan are provided in Figure 1 and 2, respectively.

While the RPDC is the applicant for the proposed project, it should be noted that the applicant would not be the developer of the fuel station. RPDC would either sell the property to a fuel station operator or maintain ownership and lease the property to an operator.

Environmental Authorisation (EA) for the overall Richmond Park development was obtained on 21 September 2012 (EIA Ref: E12/2/4/2-A6/399-1009/10) (which was subsequently amended on 1 August 2013 (EIA Ref: 16/3/1/5/A5/106/1019/13)) by means of a Scoping and Environmental Impact Assessment (EIA) process. The EA provided for the development of a mixed-use of retail, industrial and general components on the land referred to as Richmond Park. Construction within Richmond Park has already commenced and large portions of the approved development area (including Erf 38333) have already been cleared to establish building platforms.

As the above-mentioned Scoping and EIA process considered the development and use of the overall site for Richmond Park (which includes Erf 38333) and site clearing on the proposed project site has already taken place, no additional specialist studies with respect to vegetation, freshwater and heritage issues will be undertaken as part of this Basic Assessment (BA) process. As the current application relates to the establishment of a fuel station, only additional potential impacts associated with the proposed project will be assessed.

SLR Consulting (South Africa) (Pty) Ltd (SLR) has been appointed by the applicant as the independent Environmental Assessment Practitioner (EAP) to undertake the BA process for the proposed project. The BA process has been undertaken in terms of the relevant requirements of the EIA Regulations, 2014 (Government Notice (GN) No. R982, as amended by GN No. 326) promulgated in terms of the National Environmental Management Act, 1998 (No. 107 of 1998), as amended (NEMA).

The public participation process was undertaken in respect of the BA process and included a 30-day public and authority review of the draft BAR and Environmental Management Programme (EMPr) between 26 August to 28 September 2020. Following the distribution of the draft BAR, additional specialist studies were commissioned to address issues raised by Interested and/or Affected Parties (I&APs), namely a geohydrological site assessment and traffic impact assessment. In addition, a feasibility study was commissioned by the RPDC for the project. In light of the above, this report represents the updated draft BAR which incorporates the findings of the additional studies. All comments received from I&APs to date have been collated and responded to in the Comments and Responses Report attached as Appendix F5. It should be noted that all significant changes to the draft BAR are underlined and in a different font (Times New Roman) to the rest of the text.



FIGURE 1: GOOGLE MAP AND GOOGLE EARTH IMAGE SHOWING THE LOCATION OF ERF 38333, MILNERTON



This Executive Summary provides a synopsis of the draft Basic Assessment Report (BAR) prepared for the proposed project. The draft BAR has been compiled to assess the potential environmental impacts of the proposed project and as a basis to inform Interested and Affected Parties (I&APs) of the proposed project and to obtain their feedback.

## 2. OPPORTUNITY TO COMMENT

The updated draft BAR and EMPr have been distributed for a 30-day public review and comment period from **18 May to 17 June 2021** in order to provide I&APs and authorities the opportunity to comment on the proposed project and the updated draft BAR. Copies of the report were made available on the SLR website ([www.slrconsulting.com/za](http://www.slrconsulting.com/za)) and at the corresponding zero-rated website (<https://slrpublicdocs.datafree.com>), which is accessible from an internet-capable mobile phone without data charges.

Any comments should be forwarded to SLR at the address, telephone or e-mail addresses shown below. For comments to be included in the final BAR, comments should reach SLR by no later than **18 May 2021**.

**Ms. Candice Sadan**  
**SLR Consulting (South Africa) (Pty) Ltd**  
5th Floor, Letterstedt House, Newlands on Main, Corner of Main and  
Campground Roads, Newlands, Cape Town 7700  
PO Box 798, Rondebosch, 7701  
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After the conclusion of the comment period, all comments received will be collated into a Comments and Responses Report and included in the final BAR, which will be prepared for submission to DEA&DP for consideration of the application.

After DEA&DP has reached a decision, all registered I&APs will be notified of the outcome of the application and the reasons for the decision. A statutory Appeal Period in terms of the National Appeal Regulations, 2014 will follow the issuing of the decision.

## 3. APPLICABILITY OF THE NEMA EIA REGULATIONS

A BA is required in terms of the EIA Regulations, 2014 (as amended), as the proposed project triggers the following listed activities:

Listing Notice 1 - GN No. R983 of 2014, as amended by GN No. 327	Project Description
14 <i>The development of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres."</i>	The proposed project entails the establishment of a service station which would have a cumulative storage capacity of 120 m <sup>3</sup> .

## 4. PROPOSED PROJECT

### Description of Proposed Fuel Station:

It is proposed that the fuel station would include a forecourt refuelling area for light vehicles, with five petrol / diesel pumps. It is estimated that four underground fuel storage tanks with a combined capacity of 120 m<sup>3</sup> would be installed.

Approximately 39 parking bays for light vehicles, two parking bays designated for use by disabled persons. No dedicated parking will be provided for use by taxis. No provision has been made for refuelling or parking for heavy vehicles.

In addition to the above, it is also proposed that a convenience store, office building and ancillary facilities would be established on the site. These facilities would include:

- Convenience store;
- Public toilets;
- ATM's;
- Restaurant and coffee shop;
- Refuse room; and
- Offices for management staff.

#### Services Description:

The following bulk infrastructure is associated with the proposed project:

- Potable Water Supply: The bulk water supply for the project would be obtained from a 160 mm diameter connection available on the western side of Richmond Park. This connection is sufficiently sized for domestic use and fire-fighting purposes. Bulk water for Richmond Park is provided from the new De Grendel reservoirs along a new 400 mm diameter bulk supply pipeline as agreed with the City of Cape Town.
- Electrical Supply: Electricity for the proposed fuel station would be provided by Richmond Park in the form of an 11kV MV metering point or a 3ph, 415 LV metering point. The overall electrical supply authority to Richmond Park is Eskom and the origin of the bulk electrical supply to be provided to the Southern Precinct of Richmond Park is the newly commissioned Tygerkloof substation.
- Sewerage: The proposed project would link into the existing 400 mm diameter sewer mains located within Richmond Park.
- Stormwater Drainage: Stormwater within the project footprint would be managed by means of underground stormwater pipes sized to accommodate for the 1:5 year storm event. An overland stormwater escape route southwest of the site would be in place to ensure the overland escape of higher return period storm event flows. Stormwater from the site would drain in a westerly direction and flow through pipes and/or open channels to a dedicated stormwater pond to be constructed for the Southern Precinct of Richmond Park.
- Telecommunications: A network of ducts, draw pits and manholes would provide the necessary infrastructure for all telecommunication services required.

#### Operating Standards:

The various components of the proposed fuel station, such as tank material and size, vent pipes, monitoring wells (sizes and positioning), etc., would comply with the relevant South African National Standards (SANS) and the South African Bureau of Standards (SABS) requirements. These include, but are not limited to, the following:

- SANS 1535 (Manufacturing and Materials).
- SANS 10 400TT (Fire Protection) 53 Sections 1-6 (the application of the National Building Regulations-Installation of Liquid Fuel Dispensing Pumps and Tanks).
- SANS 10131: 2004 Section 5 (the storage and handling of liquid fuel – large consumer installations).
- SANS 10089 Parts I, II & III (leak detection/monitoring).
- SANS 1010.

#### Access:

Access to the proposed fuel station would be from the north and would be provided by an unnamed internal road within the Southern Precinct of Richmond Park using a left and right-in configuration. Access out of the proposed fuel station would

be provided in two ways: 1) By exiting northwards via the previously mentioned unnamed road using a left and right-out configuration and / or 2) by exiting westwards onto Upper Southern Precinct Boulevard using a left-out only configuration onto Plattekloof Road.

## 5. AFFECTED ENVIRONMENT

The property is located on Plattekloof Road, approximately 500 m east of the National Route 7 (N7), in Milnerton. The topography and gradient of the site is generally flat, with a gentle slope to the north-northwest. The site is located approximately 30 m above mean sea level.

No natural surface water resources are located on or in close proximity to, the site. In terms of the City of Cape Town (CCT) 2018 Biodiversity Network, Erf 38333 is demarcated as an *Unselected Irreversibly Modified Site*. No sensitive environments have been identified on site, or in close proximity (see Appendix D).

The site is underlain by undifferentiated coastal deposits (unconsolidated to semi-consolidated sediments including, sand, calcrete, calcarenite, aeolianite, marine gravel clay, silcrete and limestone) of the Sandveld Group. Groundwater depth is estimated at approximately 7 m below ground level. The aquifer below the site is classified as a major aquifer of most vulnerability and high susceptibility. Groundwater is inferred to flow in a westerly / north-westerly direction towards the Dieprivier, with potential influence from on-site topography and / or road infrastructure in the downstream direction. The site is characterised by medium to highly permeable subsoils.

The closest residential suburbs to the site are Bothasig, which is situated less than 100 m south, and Richwood, located 1 500 m north. The Strategic Fuel Fund (SFF) Tank Farm and Astron Energy Refinery are located 250 m east and 800 m west, respectively, of the site.

## 6. ENVIRONMENTAL IMPACT STATEMENT

The majority of the impacts are expected to be of **VERY LOW** to **LOW** significance after mitigation. Socio-economic benefits related to potential employment opportunities are rated as **VERY LOW (POSITIVE)** during the construction phase, and **LOW (POSITIVE)** during the operational phase, due to the temporary and permanent nature of the opportunities, respectively. Impacts related to traffic are deemed to be **VERY LOW** during both the construction and operational phases.

Construction activities would result in a localised increase in dust, noise levels and visual impacts. These impacts may be a nuisance to local residents. During operation, some noise may be generated from general operational activities and air quality may be impacted by emissions released from vehicles refuelling at the fuel station. The nuisance impacts (air quality, noise and visual) during the construction and operation phases are expected to be of a **VERY LOW** and **LOW** significance after mitigation for the construction and operation phases, respectively.

During construction the handling and storage of hazardous substances and the batching of concrete increases the potential occurrence of spillages, which could impact groundwater resources. During operation, potential leakages from underground storage tanks may contaminate groundwater resources. With the implementation of appropriate mitigation measures, the impact on groundwater resources are deemed to be **VERY LOW** during the construction and operational phases.

The proposed fuel station has a potential fire risk associated with the fuel (flammable liquids) and electrical equipment used on site. A fire could impact on the health and safety of the employees as well as patrons of the fuel station. With effective measures put in place, the significance of the impact is deemed **LOW** after mitigation.

The No-Go Option means that the project would not proceed and none of the above-mentioned impacts would take place. From a botanical, freshwater and cultural-heritage perspective, there is no difference between the project proceeding or the no-go alternative as no vegetation, water resources and artefacts of cultural-heritage significance are present on site.

From a socio-economic perspective, there would be no contribution to the local economy or improvement in livelihoods would take place. For these reasons, the No-Go alternative is deemed to have a **VERY LOW** significance after mitigation.

A summary of the positive and negative impacts identified for the proposed project is provided overleaf.

**TABLE 6-1: CONSTRUCTION-RELATED IMPACTS.**

Impact	Significance without mitigation	Significance with mitigation
Nuisance (air quality, noise and visual)	<b>Low</b>	<b>VERY LOW</b>
Creation of temporary employment opportunities	<b>Very Low (positive)</b>	<b>VERY LOW (POSITIVE)</b>
Traffic	<b>Very Low</b>	<b>VERY LOW</b>
Groundwater	<b>Very Low</b>	<b>VERY LOW</b>

**TABLE 6-2: OPERATION-RELATED IMPACTS.**

Impact	Significance without mitigation	Significance with mitigation
Nuisance (air quality, noise and visual)	<b>Low to Medium</b>	<b>LOW</b>
Creation of temporary employment opportunities	<b>Low (positive)</b>	<b>LOW (POSITIVE)</b>
Traffic	<b>Low</b>	<b>VERY LOW</b>
Groundwater	<b>Very Low to Low</b>	<b>VERY LOW</b>
Fire, health and safety	<b>Medium</b>	<b>LOW</b>

**TABLE 6-3: IMPACTS ASSOCIATED WITH THE NO-GO OPTION.**

Impact	Significance without mitigation	Significance with mitigation
No-Go Alternative	<b>Very Low</b>	<b>VERY LOW</b>

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## ACRONYMS AND ABBREVIATIONS

Acronym / Abbreviation	Definition
BAR	Basic Assessment Report
CBA	Critical Biodiversity Area
CCT	City of Cape Town
DEA&DP	Department of Environmental Affairs and Development Planning
DHSWS	Department of Human Settlements, Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EMF	Environmental Management Framework
EMPr	Environmental Management Programme
ESA	Ecological Support Area
GLA	Gross Leasable Land
HWC	Heritage Western Cape
I&APs	Interested and Affected Parties
IDP	Integrated Development Plan
LOS	Levels of Service
N7	National Route 7
NEMA	National Environmental Management Act (NEMA), 1998 (Act 107 of 1998)
NHRA	National Heritage Resources Act, 1999 (Act 25 of 1999)
PSDF	Provincial Spatial Development Framework
RPDC	Richmond Park Development Company (Pty) Ltd
SABS	South African Bureau of Standards
SANS	South African National Standard
SFF	Strategic Fuel Fund
SLR	SLR Consulting (South Africa) (Pty) Ltd
WCBSP	Western Cape Biodiversity Spatial Plan
WCG	Western Cape Government



FORM NO. BAR10/2019

## BASIC ASSESSMENT REPORT

### THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.

MARCH 2021

(For official use only)	
Pre-application Reference Number (if applicable):	
EIA Application Reference Number:	
NEAS Reference Number:	
Exemption Reference Number (if applicable):	
Date BAR received by Department:	
Date BAR received by Directorate:	
Date BAR received by Case Officer:	

### GENERAL PROJECT DESCRIPTION

**This must include an overview of the project including the Farm name/Portion/Erf number**

The applicant, the Richmond Park Development Company (RPDC), on behalf of the registered landowner, the Richmond Park Communal Property Association, is proposing to develop a fuel station on Erf 38333, located off Plattekloof Road, Milnerton, Cape Town. The proposed fuel station would be located within the Southern Precinct of the existing Richmond Park. A locality map is provided in Appendix A1. The location of Erf 38333 in relation to the greater Southern Precinct of Richmond Park is provided in Appendix A2. The site layout plan of the proposed fuel station is provided in Appendix B.

While the RPDC is the applicant for the proposed project, it should be noted that the applicant would not be the developer of the fuel station. RPDC would either sell the property to a service station operator or maintain ownership and lease the property to an operator.

Environmental Authorisation (EA) for the overall Richmond Park development was obtained on 21 September 2012 (EIA Ref: E12/2/4/2-A6/399-1009/10) (which was subsequently amended on 1 August 2013 (EIA Ref: 16/3/1/5/A5/106/1019/13)) by means of a Scoping and Environmental Impact Assessment (EIA) process. The EA provided for the development of a mixed-use of retail, industrial and general components on the land referred to as Richmond Park. Construction within Richmond Park has already commenced and large portions of the approved development area (including Erf 38333) have already been cleared to establish building platforms. Site photographs are provided in Appendix C.

As the above-mentioned Scoping and EIA process considered the development and use of the overall site for Richmond Park (which includes Erf 38333) and site clearing on the proposed project site has already taken place, no additional specialist studies with respect to vegetation, freshwater and heritage issues will be undertaken as part of this Basic Assessment (BA) process. As the current application relates to the establishment of a fuel station, only additional potential impacts associated with the proposed project will be assessed.

It is proposed that the fuel station would include a forecourt refuelling area for light vehicles, with five petrol / diesel pumps. It is estimated that four underground fuel storage tanks with a combined capacity of 120 m<sup>3</sup> would be installed. Approximately 39 parking bays for light vehicles, two parking bays designated for use by disabled. No dedicated parking will be provided for use by taxis. No provision has been made for refuelling or parking for heavy vehicles.

In addition to the above, it is also proposed that a convenience store, office building and ancillary facilities would be established on the site. These facilities would include:

- Convenience store;
- Public toilets;
- ATM's;
- Restaurant and coffee shop;
- Refuse room; and
- Offices for management staff.

The proposed project would link into the existing bulk service infrastructure that has been put in place for the overall Richmond Park development.

SLR Consulting (South Africa) (Pty) Ltd (SLR) has been appointed by the applicant as the independent Environmental Assessment Practitioner (EAP) to undertake the BA process for the proposed project. The BA process has been undertaken in terms of the relevant requirements of the EIA Regulations, 2014 (Government Notice (GN) No. R982, as amended by GN No. 326) promulgated in terms of the National Environmental Management Act, 1998 (No. 107 of 1998), as amended (NEMA).

It should be noted that an Application for EA for the proposed project was initially submitted to the Department of Environmental Affairs and Development Planning (DEA&DP) on 26 August 2020. The public participation process was undertaken in respect of the BA process and included a 30-day public and authority review of the draft BAR and Environmental Management Programme (EMPr) between 26 August to 28 September 2020. All comments received from I&APs to date have been collated and responded to in the Comments and Responses Report attached as Appendix F5. Following the distribution of the draft BAR, additional specialist studies were commissioned to address issues raised by Interested and/or Affected Parties (I&APs), namely:

- a geo-hydrological assessment;
- a traffic impact assessment; and
- a feasibility study.

In light of the above, this report represents the updated draft BAR which incorporates the findings of the additional studies. It should be noted that all significant changes to the draft BAR are underlined and in a different font (Times New Roman) to the rest of the text.

#### IMPORTANT INFORMATION TO BE READ PRIOR TO COMPLETING THIS BASIC ASSESSMENT REPORT

1. **The purpose** of this template is to provide a format for the Basic Assessment report as set out in Appendix 1 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) in order to ultimately obtain Environmental Authorisation.
2. The Environmental Impact Assessment ("EIA") Regulations is defined in terms of Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") hereinafter referred to as the "NEMA EIA Regulations".
3. The required information must be typed within the spaces provided in this Basic Assessment Report ("BAR"). The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided.
4. All applicable sections of this BAR must be completed.
5. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority. If information is not submitted with this BAR due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.
6. This BAR is current as of **November 2019**. It is the responsibility of the Applicant/ EAP to ascertain whether subsequent versions of the BAR have been released by the Department. Visit this Department's website at <http://www.westerncape.gov.za/eado> to check for the latest version of this BAR.

7. This BAR is the standard format, which must be used in all instances when preparing a BAR for Basic Assessment applications for an environmental authorisation in terms of the NEMA EIA Regulations when the Western Cape Government Department of Environmental Affairs and Development Planning (“DEA&DP”) is the Competent Authority.
8. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this BAR must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department. Reasonable access to copies of this Report must be provided to the relevant Organs of State for consultation purposes, which may, if so indicated by the Department, include providing a printed copy to a specific Organ of State.
9. This BAR must be duly dated and originally signed by the Applicant, EAP (if applicable) and Specialist(s) and must be submitted to the Department at the details provided below.
10. The Department’s latest Circulars pertaining to the “One Environmental Management System” and the EIA Regulations, any subsequent Circulars, and guidelines must be taken into account when completing this BAR.
11. Should a water use licence application be required in terms of the National Water Act, 1998 (Act No. 36 of 1998) (“NWA”), the “One Environmental System” is applicable, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the NWA. Refer to this Department’s Circular EADP 0028/2014: One Environmental Management System.
12. Where Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (“NHRA”) is triggered, a copy of Heritage Western Cape’s final comment must be attached to the BAR.
13. The Screening Tool developed by the National Department of Environmental Affairs must be used to generate a screening report. Please use the Screening Tool link <https://screening.environment.gov.za/screeningtool> to generate the Screening Tool Report. The screening tool report must be attached to this BAR.
14. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) (“NEM:AQA”), the submission of the Report must also be made as follows, for- Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department’s Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office. Atmospheric Emissions Licence Applications, this report must also be (i.e., another hard copy and electronic copy) submitted for the attention of the Licencing Authority or this Department’s Air Quality Management Directorate (Tel: 021 483 2888 and Fax: 021 483 4368) at the same postal address as the Cape Town Office.

#### DEPARTMENTAL DETAILS

CAPE TOWN OFFICE: REGION 1 and REGION 2 (Region 1: City of Cape Town, West Coast District) (Region 2: Cape Winelands District & Overberg District)	GEORGE OFFICE: REGION 3 (Central Karoo District & Garden Route District)
<p>BAR must be sent to the following details:</p> <p>Western Cape Government                      Department of Environmental Affairs and Development Planning                      Attention: Directorate: Development Management (Region 1 or 2)                      Private Bag X 9086                      Cape Town,                      8000</p> <p>Registry Office                      1<sup>st</sup> Floor Utilitas Building                      1 Dorp Street,                      Cape Town</p> <p>Queries should be directed to the Directorate: Development Management (Region 1 and 2) at:                      Tel: (021) 483-5829                      Fax (021) 483-4372</p>	<p>BAR must be sent to the following details:</p> <p>Western Cape Government                      Department of Environmental Affairs and Development Planning                      Attention: Directorate: Development Management (Region 3)                      Private Bag X 6509                      George,                      6530</p> <p>Registry Office                      4<sup>th</sup> Floor, York Park Building                      93 York Street                      George</p> <p>Queries should be directed to the Directorate: Development Management (Region 3) at:                      Tel: (044) 805-8600                      Fax (044) 805 8650</p>

#### MAPS

<b>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.</b>	
Locality Map:	<p>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:</p> <ul style="list-style-type: none"> <li>• an accurate indication of the project site position as well as the positions of the alternative sites, if any;</li> <li>• road names or numbers of all the major roads as well as the roads that provide access to the site(s)</li> <li>• a north arrow;</li> <li>• a legend; and</li> <li>• a linear scale.</li> </ul> <p>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.</p>

	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.
<b>Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.</b>	
Site Plan:	<p>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:</p> <ul style="list-style-type: none"> <li>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.</li> <li>The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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 <b>must</b> be clearly indicated on the site plan.</li> <li>Servitudes and an indication of the purpose of each servitude must be indicated on the site plan.</li> <li>Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to):                     <ul style="list-style-type: none"> <li>Watercourses / Rivers / Wetlands</li> <li>Flood lines (<i>i.e.</i>, 1:100 year, 1:50 year and 1:10 year where applicable);</li> <li>Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&amp;DP"):                             <ul style="list-style-type: none"> <li>Ridges;</li> <li>Cultural and historical features/landscapes;</li> <li>Areas with indigenous vegetation (even if degraded or infested with alien species).</li> </ul> </li> </ul> </li> <li>Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted.</li> <li>North arrow</li> </ul> <p>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.</p>
Site photographs	Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as <b>Appendix C</b> . The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.
Biodiversity Overlay Map:	A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as <b>Appendix D</b> .
Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as <b>Appendix A3</b> .

## ATTACHMENTS

**Note:** The Appendices must be attached to the BAR as per the list below. Please use a ✓ (tick) or a x (cross) to indicate whether the Appendix is attached to the BAR. The following checklist of attachments must be completed.

APPENDIX		✓ (Tick) or x (cross)
Appendix A	<b>Maps</b>	
	Appendix A1: Locality Map	✓
	Appendix A2: Site layout in context	✓
	Appendix A3: Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by DEA&DP	Not Applicable
Appendix B	Appendix A4: Map with the GPS co-ordinates for linear activities	Not Applicable
	Appendix B1: Site layout	✓
	Appendix B2: Site alternatives	✓
	Appendix B3: A map which superimposes the proposed development on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas	Not Applicable
Appendix C	Photographs	✓
Appendix D	Biodiversity overlay map	✓

APPENDIX		✓ (Tick) or x (cross)
Appendix E	Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.	
	Appendix E1:	Final comment/ROD from HWC
	Appendix E2:	Copy of comment from Cape Nature
	Appendix E3:	Final Comment from the DHSWS
	Appendix E4:	Comment from the DEA: Oceans and Coast
	Appendix E5:	Comment from the DAFF
	Appendix E6:	Comment from WCG: Transport and Public Works
	Appendix E7:	Comment from WCG: DoA
	Appendix E8:	Comment from WCG: DHS
	Appendix E9:	Comment from WCG: DoH
	Appendix E10:	Comment from DEA&DP: Pollution Management
	Appendix E11:	Comment from DEA&DP: Waste Management
	Appendix E12:	Comment from DEA&DP: Biodiversity
	Appendix E13:	Comment from DEA&DP: Air Quality
	Appendix E14:	Comment from DEA&DP: Coastal Management
	Appendix E15:	Comment from the local authority
	Appendix E16:	Confirmation of all services (water, electricity, sewage, solid waste management)
	Appendix E17:	Comment from the District Municipality
	Appendix E18:	Copy of an exemption notice
	Appendix E19:	Pre-approval for the reclamation of land
	Appendix E20:	Proof of agreement/TOR of the specialist studies conducted.
	Appendix E21:	Proof of land use rights
Appendix E22:	Proof of public participation agreement for linear activities	
Appendix F	Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.	
	Appendix F1:	I&P database
	Appendix F2:	Notification letters
	Appendix F3:	Newspaper advertisements
	Appendix F4:	Site notices
	Appendix F5:	Comments and Responses Report
Appendix G	Specialist Reports	
	Appendix G1:	<u>Traffic impact assessment</u>
	Appendix G2:	<u>Geohydrological site assessment</u>
	Appendix G3:	<u>Feasibility Study</u>
Appendix H	EMPr	
Appendix I	Screening tool report	
Appendix J	The impact and risk assessment for each alternative	
Appendix K	Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline	

## SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE:		GEORGE OFFICE:	
	REGION 1 (City of Cape Town, West Coast District)	REGION 2 (Cape Winelands District & Overberg District)	REGION 3 (Central Karoo District & Garden Route District)	
<b>Name of Applicant/Proponent:</b>	Richmond Park Development Company (Pty) Ltd			
<b>Name of contact person for Applicant / Proponent (if other):</b>	Alexander de Beer			
<b>Company / Trading name / State Department / Organ of State:</b>	N/A			
<b>Company Registration Number:</b>	2007/024008/07			
<b>Postal address:</b>	c/o Atterbury Property Cape (Pty) Ltd, Postnet Suite 103			
	Private Bag X7, Tygervalley	<b>Postal code:</b>	7536	
<b>Telephone:</b>	012 471 1600	<b>Cell:</b>	082 412 0920	
<b>E-mail:</b>	alex@atterbury.co.za	<b>Fax:</b>	-	
<b>Company of EAP:</b>	SLR Consulting (South Africa) (Pty) Ltd			
<b>EAP name:</b>	Stuart Heather-Clark / Nicholas Arnott / Rizqah Baker			
<b>Postal address:</b>	PO Box 798			
	<u>Rondebosch</u>	<b>Postal code:</b>	<u>7701</u>	
<b>Telephone:</b>	(021) 461 1118	<b>Cell:</b>	082 612 1939	
<b>E-mail:</b>	shclark@slrconsulting.com / narnott@slrconsulting.com / rbaker@slrconsulting.com	<b>Fax:</b>	-	
<b>Qualifications:</b>	Stuart Heather-Clark – M.Phil (Environmental Science) Nicholas Arnott – B.SC (Hons) (Environmental and Geographical Sciences) Rizqah Baker – BA (Hons) (Environmental and Geographical Sciences)			
<b>EAPASA registration no:</b>	Stuart Heather-Clark – 2019/613			
<b>Name of landowner:</b>	Richmond Park Communal Property Association			
<b>Name of contact person for landowner:</b>	N/A			
<b>Postal address:</b>	N/A			
<b>Telephone:</b>	N/A			
<b>E-mail:</b>	N/A			
<b>Name of Person in control of the land:</b>	Same as applicant.			
<b>Name of contact person for person in control of the land:</b>				
<b>Postal address:</b>				
<b>Telephone:</b>				
<b>E-mail:</b>				
<b>Municipality in whose area of jurisdiction the proposed activity will fall:</b>	City of Cape Town			
<b>Contact person:</b>	Mr Dimitri Georgeades (Environmental and Heritage Management: Central Region)			
<b>Postal address:</b>	PO Box 4529			
	Cape Town	<b>Postal code:</b>	8000	
<b>Telephone:</b>	021 400 6518	<b>Cell:</b>	072 765 1781	
<b>E-mail:</b>	dimitri.georgeades@capetown.gov.za	<b>Fax:</b>	021 425 4448	

## SECTION B: CONFIRMATION OF SPECIFIC PROJECT DETAILS AS INCLUDED IN THE APPLICATION FORM

1.	Is the proposed development (please tick):	New	✓	Expansion	
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.				
The project site is considered to be a brownfields site, as the entirety of the overall erf had already been cleared for the installation of the civil infrastructure for Richmond Park (for which an existing EA had been issued by the Department of Environmental Affairs (DEA&DP) on 21 September 2012 and subsequently amended on 1 August 2013).					
3.	For Linear activities or developments				
N/A.					
<b>Note: For Linear activities or developments longer than 500 m, a map indicating the co-ordinates for every 100 m along the route must be attached to this BAR as Appendix A3.</b>					
4.	Other developments				
4.1.	Property size(s) of all proposed site(s):	4 998 m <sup>2</sup>			
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):	N/A			
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:	Fuel station: 4 998 m <sup>2</sup> Convenience store & ancillary facilities: 330 m <sup>2</sup> Canopy: 273 m <sup>2</sup>			
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).				
<p>The applicant, the RPDC, on behalf of the registered landowner, the Richmond Park Communal Property Association, is proposing to establish a fuel station on Erf 38333, located off Platteklouf Road, Milnerton, Cape Town. The proposed fuel station would be located within the Southern Precinct of the existing Richmond Park. A locality map is provided in Appendix A1. The location of Erf 38333 in relation to the greater Southern Precinct of Richmond Park is provided in Appendix A2.</p> <p>While the RPDC is the applicant for the proposed project, it should be noted that the applicant would not be the developer of the fuel station. RPDC would either sell the property to a fuel station operator or maintain ownership and lease the property to an operator.</p> <p>EA for the overall Richmond Park development was obtained on 21 September 2012 (EIA Ref: E12/2/4/2-A6/399-1009/10) (which was subsequently amended on 1 August 2013 (EIA Ref: 16/3/1/5/A5/106/1019/13)) by means of a Scoping and EIA process. The EA provided for the development of a mixed-use of retail, industrial and general components on the land referred to as Richmond Park. Construction within Richmond Park has already commenced and large portions of the approved development area (including Erf 38333) have already been cleared to establish building platforms. Site photographs are provided in Appendix C.</p> <p>As the above-mentioned Scoping and EIA process considered the development and use of the overall site for Richmond Park (which includes Erf 38333) and site clearing on the proposed project site has already taken place, no additional specialist studies with respect to vegetation, freshwater and heritage issues will be undertaken as part of this BA process. As the current application relates to the establishment of a fuel station, only additional potential impacts associated with the proposed project will be assessed.</p> <p><u>Description of the Proposed Fuel Station:</u></p> <p>It is proposed that the fuel station would include a forecourt refuelling area for light vehicles, with five petrol / diesel pumps. It is estimated that four underground fuel storage tanks with a combined capacity of 120 m<sup>3</sup> would be installed. Approximately 39 parking bays for light vehicles, two parking bays designated for use by disabled persons. <u>No dedicated parking will be provided for use by taxis.</u> No provision has been made for refuelling or parking for heavy vehicles.</p> <p>In addition to the above, it is also proposed that a convenience store, office building and ancillary facilities would be established on the site. These facilities would include:</p> <ul style="list-style-type: none"> <li>• Convenience store;</li> <li>• Public toilets;</li> <li>• ATM's;</li> <li>• Coffee shop;</li> <li>• Refuse room; and</li> <li>• Offices for management staff.</li> </ul>					

**Services Description:**

The following bulk infrastructure is associated with the proposed project:

- **Potable Water Supply:** The bulk water supply for the project would be obtained from a 160 mm diameter connection available on the western side of Richmond Park. This connection is sufficiently sized for domestic use and fire-fighting purposes. Bulk water for Richmond Park is provided from the new De Grendel reservoirs along a new 400 mm diameter bulk supply pipeline as agreed with the City of Cape Town.
- **Electrical Supply:** Electricity for the proposed filling station would be provided by Richmond Park in the form of an 11kV MV metering point or a 3ph, 415 LV metering point. The overall electrical supply authority to Richmond Park is Eskom and the origin of the bulk electrical supply to be provided to the Southern Precinct of Richmond Park is the newly commissioned Tygerkloof substation.
- **Sewerage:** The proposed project would link into the existing 400 mm diameter sewer mains located within Richmond Park.
- **Stormwater Drainage:** Stormwater within the project footprint would be managed by means of underground stormwater pipes sized to accommodate for the 1:5 year storm event. An overland stormwater escape route southwest of the site would be in place to ensure the overland escape of higher return period storm event flows. Stormwater from the site would drain in a westerly direction and flow through pipes and/or open channels to a dedicated stormwater pond to be constructed for the Southern Precinct of Richmond Park.
- **Telecommunications:** A network of ducts, draw pits and manholes would provide the necessary infrastructure for all telecommunication services required.

**Operating Standards:**

The various components of the proposed filling station, such as tank material and size, vent pipes, monitoring wells (sizes and positioning), etc., would comply with the relevant South African National Standards (SANS) and the South African Bureau of Standards (SABS) requirements. These include, but are not limited to, the following:

- SANS 1535 (Manufacturing and Materials);
- SANS 10 400TT (Fire Protection) 53 Sections 1-6 (the application of the National Building Regulations-Installation of Liquid Fuel Dispensing Pumps and Tanks);
- SANS 10131: 2004 Section 5 (the storage and handling of liquid fuel – large consumer installations),
- SANS 10089 Parts I, II & III (leak detection/monitoring); and
- SANS 1010.

**4.5. Indicate how access to the proposed site(s) will be obtained for all alternatives.**

Access to the proposed fuel station would be from the north and would be provided by an unnamed internal road within the Southern Precinct of Richmond Park using a left and right-in configuration. Access out of the proposed fuel station would be provided in two ways: 1) By exiting northwards via the previously mentioned unnamed road using a left and right-out configuration and / or 2) by exiting westwards onto Upper Southern Precinct Boulevard using a left-out only configuration onto Plattekloof Road.

<b>4.6.</b>	<b>SG Digit code(s) of the proposed site(s) for all alternatives:</b>	C	0	1	6	0	0	3	4	0	0	0	3	8	3	3	3	0	0	0	0	0
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<b>4.7.</b>	<b>Coordinates of the proposed site(s) for all alternatives:</b>																				
	<b>Latitude (S)</b>										33°					50'					57.410"
	<b>Longitude (E)</b>										18°					32'					18.311"

## SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOLS

### 1. Exemption applied for in terms of the NEMA and the NEMA EIA Regulations

Has exemption been applied for in terms of the NEMA and the NEMA EIA Regulations? If yes, include a copy of the exemption notice in Appendix E18.	YES	NO ✓
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### 2. Is the following legislation applicable to the proposed activity or development?

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). If yes, attach a copy of the comment from the relevant competent authority as Appendix E4 and the pre-approval for the reclamation of land as Appendix E19.	YES	NO ✓
The National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as Appendix E1.	YES ✓	NO
The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DHSWS as Appendix E3.	YES	NO ✓
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM: AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.	YES	NO ✓
The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM: WA")	YES	NO ✓
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").	YES	NO ✓
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").	YES	NO ✓
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5.	YES	NO ✓

### 3. Other legislation

List any other legislation that is applicable to the proposed activity or development.
<ul style="list-style-type: none"> <li>• <b>Spatial Planning and Land Use Management Act (Act 16 of 2013)</b> - Provides the overarching framework for spatial planning and land use management.</li> <li>• <b>Occupational Health and Safety Act (Act 85 of 1993), as amended</b> - Sets out the framework for the health and safety of persons at work, the health and safety of persons in connection with the activities of persons at work, and the requirements for the advisory council for occupational health and safety.</li> <li>• <b>National Road Traffic Act (Act 93 of 1996)</b> - Sets out the regulations relating to the transportation of dangerous goods and substances by road.</li> <li>• <b>Petroleum Products Act (Act 120 of 1977), as amended</b> - The Act regulates the distribution and sale of petroleum.</li> </ul>

### 4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.
<p><b>City of Cape Town - Integrated Waste Management Policy (2006)</b> - This policy provides for the mechanisms required to meet the overarching objective for the reduction of waste and the environmental impacts of all forms of waste, so that the socio-economic development of South Africa, the health of the people and the quality of its environmental resources are no longer adversely affected by the effects of waste. The policy provides for the regulation of the provision of waste management services, either through internal or departmental services, or external service mechanisms.</p>

### 5. Guidelines

List the guidelines which have been considered relevant to the proposed activity or development and explain how they have influenced the development proposal.
<ul style="list-style-type: none"> <li>• <b>Impact significance, Integrated Environmental Management, Information Series 5 (2002)</b> - This guideline was consulted to inform the assessment of significance of impacts of the proposed project.</li> <li>• <b>Cumulative Effects Assessment, Integrated Environmental Management, Information Series 7 (2004)</b> - This guideline will be consulted to inform the consideration of potential cumulative effects of the proposed project.</li> <li>• <b>Criteria for determining Alternatives in EIA, Integrated Environmental Management, Information Series 11 (2004)</b> - This guideline was consulted to inform the consideration of alternatives.</li> <li>• <b>Environmental Management Plans, Integrated Environmental Management, Information Series 12 (2004)</b> - This guideline will be consulted to ensure that the Environmental Management Programme (EMPr) has been adequately compiled.</li> <li>• <b>Environmental Impact Reporting, Integrated Environmental Management, Information Series 15 (2004)</b> - This guideline was consulted to inform the approach to impact reporting.</li> <li>• <b>Guideline on need and desirability (2017)</b> - This guideline informed the consideration of the need and desirability aspects of the proposed project.</li> <li>• <b>Public Participation guideline in terms of NEMA (2017)</b> - The purpose of these guidelines is to ensure that an adequate public participation process was undertaken during the BA process.</li> </ul>

- **Covid-19 Directions published in terms of the Disaster Management Act, 2002 (March 2002)** – These Directions informed the form and levels of public participation possible within the restrictions related to the National State of Disaster.

**6. Protocols**

**Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form**

General requirements for undertaking an initial site sensitivity verification where no specific assessment protocol has been identified

The National Screening Tool identified the need to undertake a Plant Species Assessment and Animal Species Assessment. However, these assessments were not undertaken for the proposed project as the project site had been previously cleared of all natural vegetation and associated habitat in accordance with the existing Environmental Authorisation for the overall erf (see Section B2 above).

A Site Sensitivity Verification Report is attached as Appendix I2.

## SECTION D: APPLICABLE LISTED ACTIVITIES

### List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 1	Describe the portion of the proposed development to which the applicable listed activity relates.
14.	<i>The development of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres."</i>	The proposed project entails the establishment of a service station which would have a cumulative storage capacity of 120 m <sup>3</sup> .
Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 3	Describe the portion of the proposed development to which the applicable listed activity relates.
N/A.		
<b>Note:</b>		
<ul style="list-style-type: none"> <li>The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted.</li> <li>Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.</li> </ul>		

### List the applicable waste management listed activities in terms of the NEM:WA

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Category A	Describe the portion of the proposed development to which the applicable listed activity relates.
N/A.		

### List the applicable listed activities in terms of the NEM:AQA

Activity No(s):	Provide the relevant Listed Activity(ies)	Describe the portion of the proposed development to which the applicable listed activity relates.
N/A.		

## SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	<b>Provide a description of the preferred alternative.</b>
Refer to response provided in Section B4.4 above.	
2.	<b>Explain how the proposed development is in line with the existing land use rights of the property as you have indicated in the NOI and application form? Include the proof of the existing land use rights granted in Appendix E21.</b>
Erf 38333 is zoned Mixed Use 3. No Gross Leasable Area (GLA) has been assigned to the erf yet, thus a related land use application is required.	
3.	<b>Explain how potential conflict with respect to existing approvals for the proposed site (as indicated in the NOI/and or application form) and the proposed development have been resolved.</b>
Refer to response provided in Section E2 above.	
4.	<b>Explain how the proposed development will be in line with the following?</b>
4.1	<b>The Provincial Spatial Development Framework (PSDF).</b>
<p>The Western Cape PSDF (2014) sets out a number of objectives and related policies in order to achieve its aim of environmental preservation, social justice and economic efficiency. The objectives of relevance to the proposed filling station are highlighted below:</p> <ul style="list-style-type: none"> <li>• Policy E3: Revitalise and strengthen urban space-economies as the engine of growth; and</li> <li>• Policy S3: Promote compact, mixed-use and integrated settlements.</li> </ul> <p>The proposed project forms part of the overall Richmond Park development, a mixed-use development, which provides for the revitalisation of the broader project area and promoting infill development. The proposed project would also provide opportunities for economic growth in the form of job creation, leading to the strengthening of the urban space-economy.</p>	
4.2	<b>The Integrated Development Plan (IDP) of the local municipality.</b>
<p>Given that the proposed project is of a relatively small scale, it is not specifically addressed in the City of Cape Town's (CCT) five-year IDP (2017 – 2022). The IDP sets out the vision of the CCT, which includes creating an enabling environment for economic growth and job creation. The proposed project would contribute to the local economy and create additional job opportunities during the construction and operational phases. The proposed development is not considered to be inconsistent with the IDP.</p>	
4.3.	<b>The Spatial Development Framework (SDF) of the local municipality.</b>
<p>The Tygerberg District Plan: SDP and Environmental Management Framework (EMF) (2012) identifies the proposed site as having the opportunity to provide for mixed use development in the form of service industrial / commercial / office / residential development. Furthermore, the district development guideline, specifically for Richmond Park, is to: "Acknowledge and respect the surrounding urban environment and develop accordingly. This includes considerations relating to neighbourhood density and character, and access to public transport, job opportunities and social facilities." The proposed fuel station would job opportunities for the surrounding communities.</p>	
4.4.	<b>The Environmental Management Framework (EMF) applicable to the area.</b>
<p>The EMF is consolidated into the Tygerberg District Plan. As such, refer to the response provided in E4.3 above regarding the alignment of the proposed project with the EMF.</p>	
5.	<b>Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development.</b>
<p>As noted previously, the proposed project site is located within an area already cleared of all natural vegetation, thus no impacts on biodiversity are expected.</p>	

6.	<p><b>Explain how the Western Cape Biodiversity Spatial Plan (WCBSBP) (including the guidelines in the handbook) has influenced the proposed development.</b></p>						
<p>As noted in the WCBSBP Handbook, the CCT 2018 Biodiversity Network is a more appropriate planning tool for the metro and should be directly referred to for any spatial planning within the CCT. Thus, the WCBSBP was not directly consulted for this project.</p> <p>In terms of the CCT 2018 Biodiversity Network, Erf 38333 is demarcated as an <i>Unselected Irreversibly Modified Site</i> (see Appendix D).</p>							
7.	<p><b>Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA.</b></p>						
<p>N/A.</p>							
8.	<p><b>Explain whether the screening report has changed from the one submitted together with the application form. The screening report must be attached as Appendix I.</b></p>						
<p>There has been no change to the Screening Report. The Screening Report has been attached as Appendix I.</p>							
9.	<p><b>Explain how the proposed development will optimise vacant land available within an urban area.</b></p>						
<p>As noted above, the proposed project will promote infill development on a previously vacant site approved for future development. Thus, the proposed project is considered to be suitable for the site at this point in time.</p>							
10.	<p><b>Explain how the proposed development will optimise the use of existing resources and infrastructure.</b></p>						
<p>The proposed project would make use of the existing service infrastructure located within the Richmond Park Development.</p>							
11.	<p><b>Explain whether the necessary services are available and whether the local authority has confirmed sufficient, spare, unallocated service capacity. (Confirmation of all services must be included in Appendix E16).</b></p>						
<p>The draft Basic Assessment Report (BAR) has been made available to the CCT for comment. It is understood that the BAR would be distributed to the service departments who will then provide confirmation of the availability of services for the proposed project. .</p>							
12.	<p><b>In addition to the above, explain the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013) or the DEA's Integrated Environmental Management Guideline on Need and Desirability. This may be attached to this BAR as Appendix K.</b></p>						
<p>As noted above, the proposed project is of a small scale and is thus is not specifically addressed in the above-mentioned PSDF, IDP or Tygerberg District Plan. Nevertheless, from the information included above, it is evident that the proposed project is aligned with the over-arching planning objectives of the City, and Province as a whole, of promoting infill development within urban areas and providing employment opportunities in the construction and operational phases.</p>							
<p>In line with DEA&amp;DP Guideline on Need and Desirability (March 2013), the need and desirability of the proposed project has been considered as follows:</p>							
<table border="1"> <tr> <th colspan="2" data-bbox="129 1496 1497 1534"> <p><b>Securing ecological sustainable development and use of natural resources</b></p> </th> </tr> <tr> <td data-bbox="129 1534 866 1594"> <p><i>How will this development (and its separate elements/aspects) impact on the ecological integrity of the area?</i></p> </td> <td data-bbox="866 1534 1497 1594"> <p>In terms of the CCT 2018 Biodiversity Network, Erf 38333 is demarcated as an <i>Unselected Irreversibly Modified Site</i>.</p> </td> </tr> <tr> <td data-bbox="129 1594 866 2031"> <p><i>How were the following ecological integrity considerations taken into account?:</i></p> <ul style="list-style-type: none"> <li>• <i>Threatened Ecosystems;</i></li> <li>• <i>Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure;</i></li> <li>• <i>CBA's and ESA's";</i></li> <li>• <i>Conservation targets;</i></li> <li>• <i>Ecological drivers of the ecosystem;</i></li> <li>• <i>Environmental attributes and management proposals contained in relevant Environmental Management Frameworks;</i></li> <li>• <i>Environmental attributes and management proposals contained in relevant Spatial Development Framework; and</i></li> </ul> </td> <td data-bbox="866 1594 1497 2031"> <p>As noted previously, the site itself has already been approved for development and all natural vegetation has been cleared from the site in accordance with the existing approvals. Thus, the establishment of the proposed fuel station will not have any impact on the ecological / ecosystem / biodiversity aspects referred to.</p> </td> </tr> </table>		<p><b>Securing ecological sustainable development and use of natural resources</b></p>		<p><i>How will this development (and its separate elements/aspects) impact on the ecological integrity of the area?</i></p>	<p>In terms of the CCT 2018 Biodiversity Network, Erf 38333 is demarcated as an <i>Unselected Irreversibly Modified Site</i>.</p>	<p><i>How were the following ecological integrity considerations taken into account?:</i></p> <ul style="list-style-type: none"> <li>• <i>Threatened Ecosystems;</i></li> <li>• <i>Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure;</i></li> <li>• <i>CBA's and ESA's";</i></li> <li>• <i>Conservation targets;</i></li> <li>• <i>Ecological drivers of the ecosystem;</i></li> <li>• <i>Environmental attributes and management proposals contained in relevant Environmental Management Frameworks;</i></li> <li>• <i>Environmental attributes and management proposals contained in relevant Spatial Development Framework; and</i></li> </ul>	<p>As noted previously, the site itself has already been approved for development and all natural vegetation has been cleared from the site in accordance with the existing approvals. Thus, the establishment of the proposed fuel station will not have any impact on the ecological / ecosystem / biodiversity aspects referred to.</p>
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<ul style="list-style-type: none"> <li>• <i>Global and international responsibilities relating to the environment (e.g. RAMSAR sites, Climate Change, etc.).</i></li> </ul>	
<p><i>How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity? What measures were explored to firstly avoid these negative impacts, and where these negative impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</i></p>	
<p><i>What waste will be generated by this development? What measures were explored to firstly avoid waste, and where waste could not be avoided altogether, what measures were explored to minimise, reuse and/or recycle the waste? What measures have been explored to safely treat and/or dispose of unavoidable waste?</i></p>	<p>During construction, a minimal volume of construction waste would be produced, such as solid waste, concrete and material. A very small portion of the construction waste would likely be hazardous in the form of fuel and / oil collection in drip trays and any contaminated soil resulting from accidental spill. It is anticipated that general activity within the forecourt area would typically generate domestic solid waste and effluent. Hazardous waste, such as oily rags and other contaminated material would be generated as part of normal operations of the fuel station. With respect to waste management during construction, an integrated waste management approach would be used, based on the principles of waste minimisation, reduction, reuse and recycling of materials. During operations, general waste would be collected by the municipality on a weekly basis.</p>
<p><i>How will this development use and/or impact on non-renewable natural resources? What measures were explored to ensure responsible and equitable use of the resources? How have the consequences of the depletion of the non-renewable natural resources been considered? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?</i></p>	<p>During the construction phase generators and municipal supply would be used. Municipal sources would be used for power supply during the operational phase. Due to the scale of the project, resource (both renewable and non-renewable) use is considered to be negligible in the context of resource use within the overall metropolitan municipality. As such, no renewable energy sources have specifically been investigated for this project.</p>
<p><i>How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part? Will the use of the resources and/or impact on the ecosystem jeopardise the integrity of the resource and/or system taking into account carrying capacity restrictions, limits of acceptable change, and thresholds? What measures were explored to firstly avoid the use of resources, or if avoidance is not possible, to minimise the use of resources? What measures were taken to ensure responsible and equitable use of the resources? What measures were explored to enhance positive impacts?</i></p>	
<p><i>Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth or does it reduce resource dependency (i.e. de-materialised growth)?</i></p>	
<p><i>Does the proposed use of natural resources constitute the best use thereof? Is the use justifiable when considering intra- and intergenerational equity, and are there more important priorities for which the resources should be used (i.e. what are the opportunity costs of using these resources for the proposed development alternative?).</i></p>	<p>In the South African context, no alternative to hydrocarbons and its use as a fuel has been identified or is economically viable.</p>
<p><i>How will the ecological impacts resulting from this development impact on people's environmental right in terms following:</i></p> <ul style="list-style-type: none"> <li>• <i>Negative impacts: e.g. access to resources, opportunity costs, loss of amenity (e.g. open space), air and water quality impacts, nuisance (noise, odour, etc.), health impacts, visual impacts, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?</i></li> <li>• <i>Positive impacts: e.g. improved access to resources, improved amenity, improved air or water quality, etc. What measures were taken to enhance positive impacts?</i></li> <li>• <i>Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socio-economic impacts (e.g. on livelihoods, loss of heritage site, opportunity costs, etc.)?</i></li> <li>• <i>Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives/targets/considerations of the area?</i></li> </ul>	<p>As noted previously, the site itself has already been approved for development and all natural vegetation has been cleared from the site in accordance with the existing approvals.</p> <p>During construction, dust and noise would be generated as a result of earthworks. The appointed Contractor would be required to ensure that the generation of dust is minimised by implementing a dust control programme (e.g. wetting of areas being disturbed) to maintain a safe working environment and minimise nuisance for surrounding residents. These activities would be managed in terms of the requirements of the EMPr (section pertaining to construction) (refer to Appendix H). The Contractor would also be required to be familiar with and adhere to any regulations and by-laws regarding the generation of noise and hours of operation.</p> <p>During operation, some noise may be generated. However, such noise is not anticipated to be audible above the existing noise</p>

<ul style="list-style-type: none"> <li>• <i>Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the “best practicable environmental option” in terms of ecological considerations?</i></li> <li>• <i>Describe the positive and negative cumulative ecological/biophysical impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and existing and other planned developments in the area?</i></li> </ul>	<p>created by traffic on Platteklouf Road. Thus, there would be no noise effect on the nearest residential area of Bothasig. As the other adjacent land uses are largely commercial in nature, no impact is anticipated on other surrounding land uses.</p> <p>There exists a risk for on-site and off-site vapour inhalation (see Section G8.4. However, this has been mitigated by the relocation of the underground storage tanks.</p> <p>Visually, the proposed project would be visible from Platteklouf Road and from the Retail Centre located within Richmond Park. Within this context, it is not expected that the fuel station would be visually out of place of the surrounding land uses on either side of the site which would also be seen from the road.</p>
<p><b>Promoting justifiable economic and social development</b></p>	
<p><i>What is the socio-economic context of the area, based on, amongst other considerations, the following considerations?:</i></p> <ul style="list-style-type: none"> <li>• <i>The IDP (and its sector plans’ vision, objectives, strategies, indicators and targets) and any other strategic plans, frameworks of policies applicable to the area.</i></li> <li>• <i>Spatial priorities and desired spatial patterns (e.g. need for integrated of segregated communities, need to upgrade informal settlements, need for densification, etc.).</i></li> <li>• <i>Spatial characteristics (e.g. existing land uses, planned land uses, cultural landscapes, etc.).</i></li> <li>• <i>Municipal Economic Development Strategy (“LED Strategy”).</i></li> </ul>	<p>As noted in the planning context provided in the sections above, the proposed fuel station is considered to be aligned with the overall planning context for the area.</p>
<p><i>Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area?</i></p>	<p>As noted in Section H4.1.1.1 and H4.1.1.3, the identified potential socio-economic impacts largely relate to nuisance and traffic impacts associated with construction activities, while socio-economic benefits relate to potential employment opportunities during the construction and operational phases (see Section H4.1.1.2 and H4.1.2.2).</p>
<p><i>Will the development:</i></p> <ul style="list-style-type: none"> <li>• <i>Complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programs?</i></li> <li>• <i>Result in the creation of residential and employment opportunities in close proximity to or integrated with each other?</i></li> <li>• <i>Reduce the need for transport of people and goods?</i></li> <li>• <i>Result in access to public transport or enable non-motorised and pedestrian transport (e.g. will the development result in densification and the achievement of thresholds in terms public transport)?</i></li> <li>• <i>Compliment other uses in the area?</i></li> <li>• <i>Be in line with the planning for the area?</i></li> <li>• <i>For urban related development, make use of underutilised land available within the urban edge?</i></li> <li>• <i>Optimise the use of existing resources and infrastructure?</i></li> <li>• <i>Consider opportunity costs in terms of bulk infrastructure expansions in non-priority areas (e.g. not aligned with the bulk infrastructure planning for the settlement that reflects the spatial reconstruction priorities of the settlement)?</i></li> <li>• <i>Discourage “urban sprawl” and contribute to compaction/densification?</i></li> </ul>	<p>Responses are provided as follows:</p> <ul style="list-style-type: none"> <li>• These are not applicable to the proposed project area.</li> <li>• Partially - the proposed project would provide employment opportunities during the construction and operational phases, however no residential opportunities would be created.</li> <li>• The location of the proposed fuel station is located on a main route (Platteklouf Road) within the area and could reduce the distance users of the road need to travel to refuel their vehicles.</li> <li>• <u>Yes – Facilities for pedestrians and cyclists that will be provided include, a sidewalk on the southern side of the Mall Access Road, a walkway between the Mall Access Road and the Convenience Store pedestrian access; and a ramp at the disabled parking bay in front of the C-Store access.</u></li> <li>• Yes - the proposed project is aligned with the development vision of the greater Richmond Park.</li> <li>• Yes - the proposed project falls within the urban edge.</li> <li>• Yes - the proposed project would make use of existing services and infrastructure as developed as part of the greater Richmond Park.</li> <li>• Yes - the proposed project is located within the urban edge.</li> </ul>

<ul style="list-style-type: none"> <li>• <i>Contribute to the correction of the historically distorted spatial patterns of settlements and to the optimum use of existing infrastructure in excess of current needs?</i></li> <li>• <i>Encourage environmentally sustainable land development practices and processes?</i></li> <li>• <i>Take into account special locational factors that might favour the specific location (e.g. the location of a strategic mineral resource, access to the port, access to rail, etc.)?</i></li> <li>• <i>Result in investment in the settlement or area in question that will generate the highest socioeconomic returns (i.e. an area with high economic potential)?</i></li> <li>• <i>Impact on the sense of history, sense of place and heritage of the area and the socio-cultural and cultural-historic characteristics and sensitivities of the area?</i></li> <li>• <i>In terms of the nature, scale and location of the development, promote or act as a catalyst to create a more integrated settlement?</i></li> </ul>	<ul style="list-style-type: none"> <li>• As noted above, the proposed project would make use of existing services within the area, however the correction of historically distorted spatial patterns is outside of the project scope.</li> <li>• The proposed project layout has been developed, as far as possible, to limit degradation and negative impact on groundwater resources.</li> <li>• Partially - the proposed project would provide employment opportunities during the construction and operational phases; however no residential opportunities would be created.</li> <li>• Heritage Western Cape (HWC) has issued final comment on the overall development of Richmond Park, within which the project site is located. The final comment received from HWC is attached as Appendix E1.</li> <li>• The creation of integrated settlements is outside of the project scope.</li> </ul>
<p><i>How were a risk-averse and cautious approach applied in terms of socio-economic impacts?:</i></p> <ul style="list-style-type: none"> <li>• <i>What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?</i></li> <li>• <i>What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities)?</i></li> <li>• <i>Critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge?</i></li> <li>• <i>Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development (and its alternatives)?</i></li> </ul>	<p>The socio-economic impacts of the proposed project are limited to nuisance (air quality, noise and visual) and traffic impacts and the provision of economic opportunities. Insofar as possible, local communities would be offered employment opportunities. Mitigation measures have been provided to reduce the impact of nuisance and traffic impacts and site layout designs were amended to alleviate traffic impacts.</p>
<p><i>How will the socio-economic impacts resulting from this development impact on people's environmental right in terms following:</i></p> <ul style="list-style-type: none"> <li>• <i>Negative impacts: e.g. health (e.g. HIV-Aids), safety, social ills, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?</i></li> <li>• <i>Positive impacts. What measures were taken to enhance positive impacts?</i></li> </ul>	<p>Due to the small nature and scale of the project, the socio-economic impacts largely relate to nuisance impacts associated with construction activities. Socio-economic benefits relate to potential employment opportunities during the construction and operational phases.</p>
<p><i>Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development's socio-economic impacts will result in ecological impacts (e.g. over utilisation of natural resources, etc.)?</i></p>	<p>No sensitive areas and / or biophysical resources have been identified on site / in close proximity to the site.</p>
<p><i>What measures were taken to pursue the selection of the "best practicable environmental option" in terms of socio-economic considerations?</i></p>	<p>Refer to the selection of the preferred layout alternative described in Section E.</p>
<p><i>What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)?</i></p>	<p>The proposed project would not result in impacts that would unfairly discriminate against any person.</p>
<p><i>Considering the need for social equity and justice, do the alternatives identified, allow the "best practicable environmental option" to be selected, or is there a need for other alternatives to be considered?</i></p>	<p>The proposed project layout has been developed to accommodate CCT's requirements in terms of vehicle stacking distance onto Platteklouf Road to increase safety. As such, the proposed project is deemed to allow for the "best practicable environmental option" to be selected.</p>
<p><i>What measures were taken to pursue equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination?</i></p>	<p>Given the scale and nature of the proposed project, the requirement to enable access to environmental resources, benefits and services to meet basic human needs of persons disadvantaged by unfair discrimination is deemed to fall outside of the project-level scope.</p>
<p><i>What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle?</i></p>	<p>See Section I below.</p>

<p><i>What measures were taken to ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition were given to all forms of knowledge, including traditional and ordinary knowledge?</i></p>	<p>The proposed projects forms part of the development vision of the already approved Richmond Park and is thus deemed to be compatible with the needs and values of Interested and Affected Parties.</p>
<p><i>Considering the interests, needs and values of all the interested and affected parties, describe how the development will allow for opportunities for all the segments of the community (e.g. a mixture of low-, middle-, and high-income housing opportunities) that is consistent with the priority needs of the local area (or that is proportional to the needs of an area)?</i></p>	

## SECTION F: PUBLIC PARTICIPATION

The Public Participation Process ("PPP") must fulfil the requirements as outlined in the NEMA EIA Regulations and must be attached as Appendix F. Please note that if the NEM: WA and/or the NEM: AQA is applicable to the proposed development, an advertisement must be placed in at least two newspapers.

**1. Exclusively for linear activities: Indicate what PPP was agreed to by the competent authority. Include proof of this agreement in Appendix E22.**

N/A.

**2. Confirm that the PPP as indicated in the application form has been complied with. All the PPP must be included in Appendix F.**

Pre-application public participation process:

- A preliminary Interested and Affected Party (I&AP) database was compiled consisting of landowners, authorities (local, regional and national, as applicable), Organs of State, Non-Governmental Organisations, Community-based Organisations and other key stakeholders. This database was compiled using databases from previous projects undertaken in the broader study area. To date 87 I&APs have been registered on the project database (see Appendix F1).

Public participation undertaken during the comment period on the draft BAR:

- I&AP notification letters were sent to the preliminary I&AP project database (see Appendix F2). The letter notified I&APs of the NEMA EIA Regulations, 2014 (as amended) public participation process as well as of the opportunity to formally register as an I&AP. The letter also announced the availability of the draft BAR for a 30-day public review and comment period from 26 August to 28 September 2020 and invited I&APs to submit comments on any aspect of the BA process and the proposed project.
- An advertisement was placed in *the Cape Times* and *Die Burger* (in English and Afrikaans respectively) on 26 August 2020 (see Appendix F3).
- Site notices were erected on site at the beginning of the comment period (see Appendix F4).
- Copies of the full report and Executive Summary were made available on the SLR website ([www.slrconsulting.com/za](http://www.slrconsulting.com/za)) and at the corresponding zero-rated website (<https://slrpublicdocs.datafree.com>), which is accessible from an internet-capable mobile phone without data charges.
- Copies of the BAR were provided to representatives of the relevant Organs of State for their review and comment.
- A copy of the BAR was also submitted to DEA&DP to request their comment as required in terms of Regulations 32(a)(aa) and (bb) and 40(3) of GN R. 326 of 7 April 2017.

Public participation process undertaken during the comment period on the updated draft BAR:

- A total of 13 submissions were received during the 30-day comment period on the draft BAR. The comments were collated into a Comments and Responses Report and responses were provided to the issues raised (see Appendix F5). The comments were duly taken into consideration in the process of compiling this updated draft BAR. Moreover, a geohydrological site assessment, traffic impact assessment and feasibility study were commissioned in this regard.
- I&AP notification letters were sent to the preliminary I&AP project database. The letter notified I&APs of the NEMA EIA Regulations, 2014 (as amended) public participation process as well as of the availability of the updated draft BAR for a 30-day public review and comment period from 18 May to 17 June 2021 and invited I&APs to submit comments on any aspect of the BA process and the proposed project.
- Copies of the full updated draft BAR and Executive Summary were made available on the SLR website and at the corresponding zero-rated website which is accessible from an internet-capable mobile phone without data charges.
- Copies of the BAR were provided to representatives of the relevant Organs of State for their review and comment.
- A copy of the BAR was also submitted to DEA&DP to request their comment as required in terms of Regulations 32(a)(aa) and (bb) and 40(3) of GN R. 326 of 7 April 2017.

Tasks envisaged for the completion of the BA process:

- All comments received in response to the updated draft BAR will be collated and responded to in a BAR Comments and Responses Report, which will be appended to the final BAR. The comments will be duly taken into consideration in the process of updating the draft BAR and the key issues will be incorporated into the final BAR.
- The final BAR will be submitted to DEA&DP for consideration and decision-making.
- The final BAR will be made available to registered I&APs for information purposes.
- After DEA&DP has reached a decision, all registered I&APs will be notified of the outcome of the application and the reasons for the decision. A statutory Appeal Period in terms of the National Appeal Regulations, 2014 will follow the issuing of the decision.

**3. Confirm which of the State Departments and Organs of State indicated in the Notice of Intent/application form were consulted with.**

State Department / Organ of State	Date request	Date comment received:
CapeNature	<u>26 August 2020 and 17 May 2021</u>	<u>Comment not received</u>
CCT: Environmental & Heritage Management		<u>6 October 2020</u>
CCT: Development Management		<u>Comment not yet received</u>
CCT: Roads and Stormwater		<u>11 September 2020</u>
Department of Water, Sanitation and Human Settlements		<u>15 October 2020</u>
Western Cape Government (WCG): Department of Transport and Public Works (DTPW)		<u>30 August 2020</u>
WCG: Department of Economic Development and Tourism		<u>Comment not yet received</u>
WCG: DEA&DP – Pollution and Chemical Management		<u>25 September 2020</u>
WCG: DEA&DP – Waste Management		<u>28 September 2020</u>
WCG: DEA&DP – Development Management		<u>25 September 2020</u>

**4. If any of the State Departments and Organs of State were not consulted, indicate which and why.**

As part of the Scoping and EIA process undertaken for the establishment of Richmond Park, HWC issued final comment on 11 January 2012 (Case No.: 110715ZS19) confirming that the Heritage Impact Assessment undertaken for the project meets the requirements of the National Heritage Resources Act, 1999 (Act 25 of 1999; NHRA) and that the project was supported subject to the requirement that the “*monitoring for fossil material by the ECO is required and that a monitoring report be submitted*”. As the proposed project is located within the overall erf for which the above approval was issued, no further authorisation applications in terms of the NHRA are deemed necessary. The final comment received from HWC is attached as Appendix E1.

**5. If any of the State Departments and Organs of State did not respond, indicate which.**

N/A.

**6. Provide a summary of the issues raised by I&APs and an indication of the manner in which the issues were incorporated into the development proposal.**

I&APs raised the following key issues and concerns during the comment period on the draft BAR (see Appendix F5):

- Geohydrological / groundwater impacts:
- Noise impacts from taxis:
- Traffic impacts:
- Crime / safety concerns: and
- Feasibility / need and desirability issues.

**Note:**

A register of all the I&AP’s notified, including the Organs of State, and all the registered I&APs must be included in Appendix F. The register must be maintained and made available to any person requesting access to the register in writing. The EAP must notify I&AP’s that all information submitted by I&AP’s becomes public information. Your attention is drawn to Regulation 40 (3) of the NEMA EIA Regulations which states that “*Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but **must** be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority.*”

All the comments received from I&APs on the pre -application BAR (if applicable and the draft BAR must be recorded, responded to and included in the Comments and Responses Report and must be included in Appendix F. All information obtained during the PPP (the minutes of any meetings held by the EAP with I&APs and other role players wherein the views of the participants are recorded) and must be included in Appendix F. Please note that proof of the PPP conducted must be included in Appendix F. In terms of the required “proof” the following is required:

- a site map showing where the site notice was displayed, dated photographs showing the notice displayed on site and a copy of the text displayed on the notice;
- in terms of the written notices given, a copy of the written notice sent, as well as:
  - if registered mail was sent, a list of the registered mail sent (showing the registered mail number, the name of the person the mail was sent to, the address of the person and the date the registered mail was sent);
  - if normal mail was sent, a list of the mail sent (showing the name of the person the mail was sent to, the address of the person, the date the mail was sent, and the signature of the post office worker or the post office stamp indicating that the letter was sent);
  - if a facsimile was sent, a copy of the facsimile Report;
  - if an electronic mail was sent, a copy of the electronic mail sent; and
  - if a “mail drop” was done, a signed register of “mail drops” received (showing the name of the person the notice was handed to, the address of the person, the date, and the signature of the person); and
- a copy of the newspaper advertisement (“newspaper clipping”) that was placed, indicating the name of the newspaper and date of publication (of such quality that the wording in the advertisement is legible).

## SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

### 1. Groundwater

1.1.	Was a specialist study conducted?	YES ✓	NO
1.2.	Provide the name and or company who conducted the specialist study.	SLR Consulting (South Africa) (Pty) Ltd.	
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.	The aquifer is classified as a major aquifer of most vulnerability and high susceptibility. <u>According to the 1:50 0000 Hydrogeological Map of Cape Town 3126, the site is underlain by undifferentiated coastal deposits (unconsolidated to semi-consolidated sediments including sand, calcrete, calcarenite, aeolianite, marine gravel, clay, silcrete and limestone) of the Sandveld Group.</u>	
1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.	<p><u>Based on the geohydrological site assessment (see Appendix G2), groundwater was found between 1.52 m and 1.99 m bgl. Using the collected information, the groundwater elevation contours of the site were interpolated to show that the groundwater flow direction on-site is north-easterly.</u></p> <p><u>No groundwater abstraction points (boreholes) were observed during the site walkover and field investigations in November 2020, however, the hydrocensus identified eight boreholes within a 500 m radius of the site. These boreholes are mostly located south and south west of the site; and are predominantly used for residential irrigation purposes (i.e. garden watering).</u></p> <p><u>Based on the findings of the geohydrological site assessment, the baseline conditions of the groundwater indicate that there has been no historical impact to the soil and groundwater at the site. The in-field parameters reveal pH values of 6.59 to 6.98, which are indicative of an acidic to neutral background. The Dissolved Oxygen values were measured from 0 mg/L to 2.8 mg/L, which are indicative of anaerobic subsurface conditions across the site. Oxidation Reduction Potential values ranged between -77 mV and -7 mV and organic compounds were not recorded above laboratory detection limits in any of the collected soil and groundwater samples. Inorganic compounds and metals were observed at concentrations below the adopted Tier 1 screening levels.</u></p>	

### 2. Surface water

2.1.	Was a specialist study conducted?	YES	NO ✓
2.2.	Provide the name and/or company who conducted the specialist study.	N/A.	
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.	No watercourses and / or wetlands are located on the project site. However, historical imagery has indicated that surface water bodies were located between 20 m of the site (2013). <u>The geohydrological site assessment (see Appendix G2), noted that surface water bodies are located at approximately 490 m northeast, as well as from 575 m to 725 m north northwest of the site. Stormwater treatment ponds are located at approximately 340 m northeast and 240 m east of the site.</u> Based on the baseline information, various recommendations for mitigation were proposed (see Section 12).	

### 3. Coastal Environment

3.1.	Was a specialist study conducted?	YES	NO ✓
3.2.	Provide the name and/or company who conducted the specialist study.	N/A	
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.	N/A	
3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.	N/A	
3.5.	Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.	N/A	

### 4. Biodiversity

4.1.	Were specialist studies conducted?	YES	NO ✓
4.2.	Provide the name and/or company who conducted the specialist studies.	N/A	
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.	As noted previously, in terms of the CCT 2018 Biodiversity Network, Erf 38333 is demarcated as an <i>Unselected Irreversibly Modified Site</i> (see Appendix D). As indicated previously, the site itself has already been approved for development and all natural vegetation has been cleared (see Appendix C).	
4.4.	Explain how the objectives and management guidelines of the Biodiversity Spatial Plan have been used and how has this influenced your proposed development.	N/A	
4.5.	Explain what impact the proposed development will have on the site-specific features and/or function of the Biodiversity Spatial Plan category and how has this influenced the proposed development.	N/A	
4.6.	If your proposed development is located in a protected area, explain how the proposed development is in line with the protected area management plan.	N/A	
4.7.	Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.	As the erf is located within an urban environment, surrounded by existing development (residential and industrial areas), no fauna of conservation concern is expected to be located on and adjacent to the site.	

## 5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.
According to the <i>CapeFarmMapper</i> Slope Classification Layer, the site has a slope percentage class of 0 – 3%, thus the topography of the site is deemed to be generally flat. Geographical aspects would not be affected by or influence the proposed project.

## 6. Heritage Resources

6.1.	Was a specialist study conducted?	YES	NO ✓
6.2.	Provide the name and/or company who conducted the specialist study.	N/A	
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.	As part of the approval process undertaken for the establishment of Richmond Park, (Heritage Western Cape (HWC) issued final comment on 11 January 2012 (Case No.: 110715ZS19) confirming that the Heritage Impact Assessment undertaken for the project meets the requirements of the National Heritage Resources Act, 1999 (Act No. 25 of 1999; NHRA) and that the project was supported subject to the requirement that the “ <i>monitoring for fossil material by the ECO is required and that a monitoring report be submitted</i> ”. As the proposed project is located within the overall erf for which the above approval was issued, no further authorisation applications in terms of the NHRA are deemed necessary. The final comment received from HWC is attached as Appendix E1.	

## 7. Historical and Cultural Aspects

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.
Refer to the response provided above.

## 8. Socio/Economic Aspects

8.1.	Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.
The closest residential suburbs to the site are Bothasig, which is situated less than 100 m south, and Richwood, located 1 500 m north. The Strategic Fuel Fund (SFF) Tank Farm and Astron Energy Refinery are located 250 m east and 800 m west, respectively, of the Richmond Park development itself. A description of the socio-economic attributes for Bothasig and Richwood are provided below.	

**Bothasig**

According to the 2011 Census, Bothasig has a population of 11 790 people, down from 12 502 people in 2001. Approximately 77 % of the population is White, 14 % are Coloured and 6 % are Black African. Approximately 15 % of the population is between the ages of 15 to 24, while 56 % are between the ages of 25 and 64. Of the adults over the age of 20, 32 % completed some secondary schooling and 44 % completed grade 12, while approximately 20 % received some form of tertiary education.

Ninety-two percent of the labour force is employed. Approximately 7 % of income earners earn less than R 1 600 per month, 17 % earn between R 1 601 and R 6 400 per month, and 40 % earn between R 6 401 and R 25 600 per month. About 99 % of the population live in formal houses.

**Richwood**

According to the 2011 Census, Richwood has a population of 2 988 people, up from 2 844 people in 2001. Approximately 72 % of the population is White, 15 % are Coloured and 11 % are Black African. Approximately 13 % of the population is between the ages of 15 to 24, while 61 % are between the ages of 25 and 64. Of the adults over the age of 20, 26 % completed some secondary schooling and 43 % completed grade 12, while approximately 28 % received some form of tertiary education.

Ninety-three percent of the labour force is employed. Approximately 3 % of income earners earn less than R 1 600 per month, 11 % earn between R 1 601 and R 6 400 per month, and 49 % earn between R 6 401 and R 25 600 per month. About 99 % of the population live in formal houses.

**8.2. Explain the socio-economic value/contribution of the proposed development.**

The capital value of the project is approximately R15 million. During the construction phase, it is estimated that approximately 100 (skilled and unskilled) temporary job opportunities would be created over the duration of the construction period. During the operation phase, it is estimated that approximately 35 (skilled and unskilled) permanent job opportunities would be created for customer service agents on the forecourt, staff at the convenience store kiosk as well as other administrative staff.

**8.3. Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.**

Due to the relatively small-scale and nature of the proposed project, no specific social initiatives are expected to arise from the proposed project. However, it is recommended that the Contractor give preference to employing people from nearby communities during the construction phase and that the Operator of the fuel station give preference to employing people from nearby communities during operation. It is recommended that these conditions be included in the construction contract and in the deed of sale of the fuel station / operation contract.

**8.4. Explain whether the proposed development will impact on people's health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development.**

During construction, dust and noise would be generated as a result of earthworks. The appointed Contractor would be required to ensure that the generation of dust is minimised by implementing a dust control programme (e.g. wetting of areas being disturbed) to maintain a safe working environment and minimise nuisance for surrounding residents. These activities would be managed in terms of the requirements of the EMPr (section pertaining to the construction phase) (refer to Appendix H). The Contractor would also be required to be familiar with and adhere to any regulations and by-laws regarding the generation of noise and hours of operation. During operation, some noise may be generated. However, such noise is not anticipated to be audible above the existing noise created by traffic on Platteklouf Road. Thus, it is not expected that there would be a change in the current ambient noise levels currently experienced by adjacent and neighbouring landowners.

Traffic on Platteklouf and / or Tygerberg Valley Road, as well as internal roads within the Southern Precinct of Richmond Park could experience minor delays due to construction vehicles accessing the site during the construction phase. However, , given that anticipated volumes of construction-related traffic on these roads (particularly Platteklouf Road) would be low in comparison to normal traffic. The operation of the fuel station is not anticipated to change the existing traffic volumes on Platteklouf, Tygerberg Valley and other internal roads in Richmond Park. As the layout of the proposed project has been designed to take into consideration the relevant CCT vehicle stacking requirements, no interruptions to the flow of traffic on Platteklouf Road are expected.

Visually, the proposed project would be visible from Platteklouf Road and from the Retail Centre located within the southern precinct of Richmond Park. Within this context, it is not expected that the fuel station would be visually out of context in relation to the surrounding land uses on either side of the site which would also be seen from the road.

## SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

### 1. Details of the alternatives identified and considered

1.1.	Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred property and site alternative.	
Erf 38333, Milnerton, is the preferred property and is located within the Southern Precinct of Richmond Park. The site is bordered by Plattekloof Road to the south.	
Provide a description of any other property and site alternatives investigated.	
In addition to the preferred alternative, three other site alternatives, were considered for the proposed fuel station. The three alternative sites considered were:	
<ul style="list-style-type: none"> <li>• Site 1 – Located opposite the preferred alternative, on the opposite side of Upper Southern Precinct Boulevard and adjacent to Plattekloof Road.</li> <li>• Site 2 – Located on the corner of internal road forming part of the retail centre site and Tygerberg Valley Roads.</li> <li>• Site 3 - Located opposite Site 2, on the opposite side of internal road forming part of the retail centre site.</li> </ul>	
All three property alternatives mentioned above are located within the Southern Precinct of Richmond Park (see Figure 1). These property alternatives were considered as they have high visibility to passing vehicular traffic and are easily accessible, two key design informants for fuel stations.	

Figure 1: Site alternatives (Source: Planning Partners 2019).

**Provide a motivation for the preferred property and site alternative including the outcome of the site selection matrix.**

Erf 38333 is considered to be the preferred site for the fuel station because of its high visibility to passing traffic on Platteklouf Road, which accommodates a high traffic load, and because it is easily accessible via Upper Southern Precinct Boulevard. The site is located within close proximity to a retail centre and other industrial uses, which is considered to be advantageous due to the synergies that exist between these land uses.

Sites 1 – 3 were not preferred for the following reasons:

- Site 1  
 Site 1 is considered to be the most prominent location that has not yet been developed within Richmond Park due to its proximity to Platteklouf Road. When considering the best development alternatives for the greater Richmond Park, the site was considered to be more suitable for alternative developments (e.g. a motor car dealership).
- Site 2  
 As part of the greater Richmond Park development, this site has been incorporated into the recently constructed retail centre development and thus was not considered further for the proposed project.
- Site 3:  
 Of all the identified site alternatives, Site 3 is the least visible from Platteklouf Road. Furthermore, exit / access from and to the site from Tygerberg Valley Road was not considered to be viable as there would be insufficient distance to permit safe vehicular movements and would not allow for a sufficient vehicle stacking distance, thereby not complying with local CCT requirements. Thus, this site was not considered further for the proposed project.

**Provide a full description of the process followed to reach the preferred alternative within the site.**

High visibility to passing traffic and accessibility are considered to be the two main design informants for the development of a fuel station. Accordingly, the above-mentioned undeveloped and undesignated sites (at the time) within Richmond Park that could meet these criteria were investigated.

Upon determining potential sites, sites were ranked in order of preference on how well they met the design informants. During this process, it became apparent that the two of the sites (Sites 1 and 2) had been subsequently earmarked for specific developments as part of the development vision of the greater Richmond Park. Thus, what is now the preferred alternative and Site 3 were considered further for the proposed development. A traffic analysis was undertaken, and it was determined that Site 3 would not be a viable option, as it would not permit safe vehicular movements between the fuel station and Tygerberg Valley Road and would not allow for a sufficient vehicle stacking distance, thereby not complying with local CCT requirements. Subsequently, the proposed project site was selected as the preferred alternative.

**Provide a detailed motivation if no property and site alternatives were considered.**

N/A.

**List the positive and negative impacts that the property and site alternatives will have on the environment.**

The preferred alternative and the three site alternatives have very similar environmental impacts. A description of these impacts is provided in Section 4.1.1 and 4.1.2.

1.2.	<b>Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.</b>
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**Provide a description of the preferred activity alternative.**

The preferred activity alternative is the planned project proposal for the establishment of a fuel station.

**Provide a description of any other activity alternatives investigated.**

No other activity alternatives were considered.

**Provide a motivation for the preferred activity alternative.**

Richmond Park has development rights for a wide range of uses which includes business premises, industry and warehousing. The necessary bulk infrastructure has been installed to accommodate developments approved to date. Given the overall development vision of the Richmond Park, the inclusion of a fuel station was proposed as it was considered to be advantageous due to the synergies that exist

between land uses. Moreover, the proposed fuel station would provide a convenient and easily accessible service facility to all users of the newly developed Richmond Park, as well as to those who travel on Plattekloof and Tygerberg Valley Roads. The proposed fuel station would also reduce the need for light vehicles travelling along Plattekloof Road to make detours and use services stations located in residential suburbs (e.g. De Grendel Filling Station located within Bothasig), thereby reducing disturbance to residential users.

Provide a detailed motivation if no activity alternatives exist.

Refer to previous response.

List the positive and negative impacts that the activity alternatives will have on the environment.

N/A

**1.3. Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts**

Provide a description of the preferred design or layout alternative.

Refer to the description provided in Section B4.4 above.

Provide a description of any other design or layout alternatives investigated.

On commencement of the BA process, an initial project layout was prepared (see Figure 2 below). The following is relevant with respect to this project layout alternative:

- **Access**  
 Access to and from the proposed fuel station would be from Upper Southern Precinct Boulevard using a left-in / left-out configuration.
- **Parking bays**  
 Approximately 24 parking parks for light vehicles would be provided.
- **Underground storage tanks**  
 The location of the underground storage tanks would be towards the north of the site.
- **Roundabout**  
 A roundabout was not included in the initial site layout.

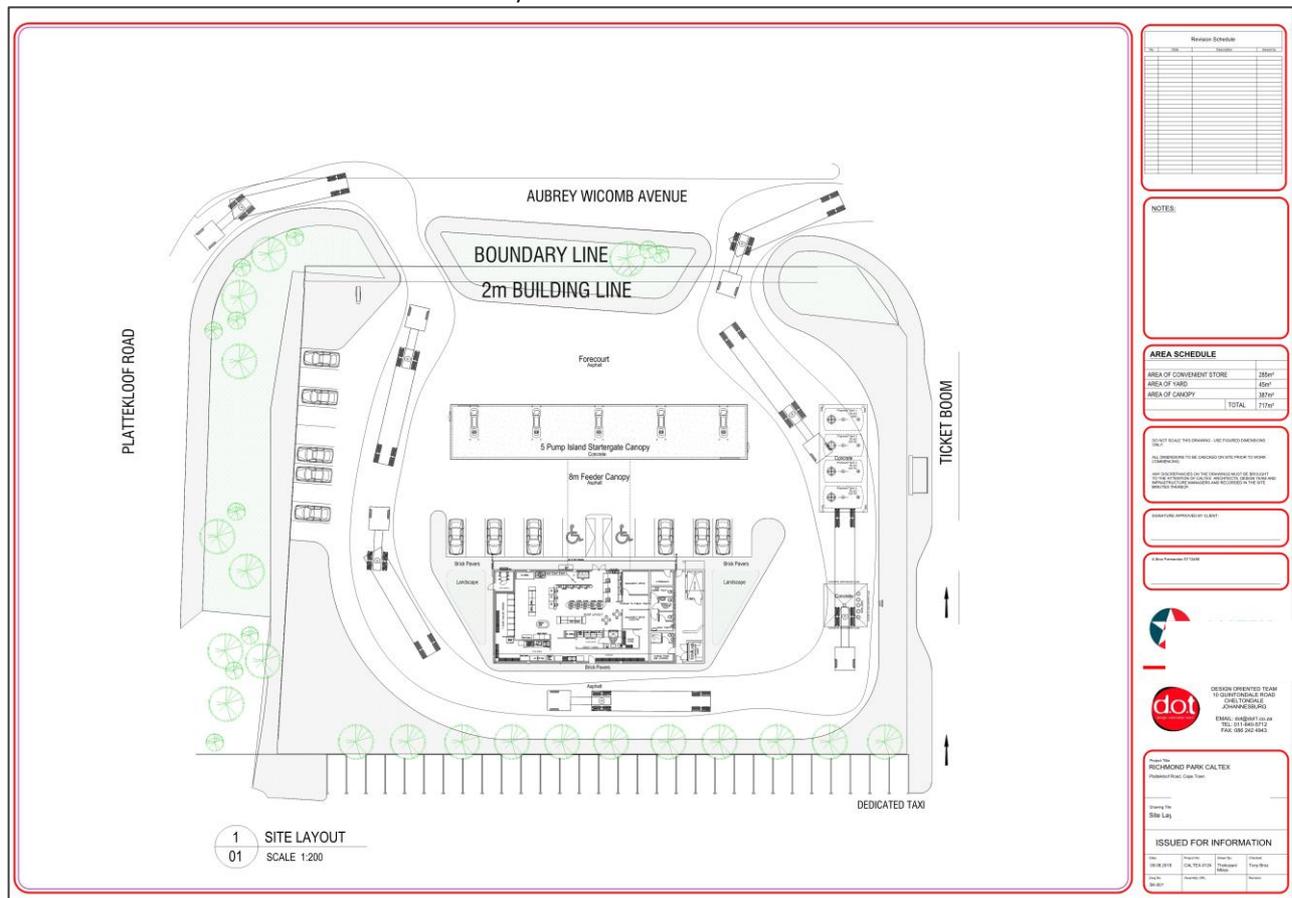


Figure 2: Site layout alternative.

<b>Provide a motivation for the preferred design or layout alternative.</b>	
Motivation for the preferred layout alternative related to access, the provision of additional parking bays and the road layout within Richmond Park. These aspects are described in more detail below.	
<ul style="list-style-type: none"> <li>• <u>Access</u> Access to and from Upper Southern Precinct Boulevard was not considered to be viable as fuel tankers would not be able to manoeuvre in and out of the fuel station. Moreover, this design / layout would not have allowed for a sufficient vehicular stacking distance onto Platteklouf and would have been in conflict with the CCT's requirements.</li> <li>• <u>Parking bays</u> According to the Parking Policy for CCT (Policy Number 17913), 2014, the minimum required number of parking bays to be provided would be 23, according to the size, scale and nature of the proposed development. The initial site layout met this requirement, but it was deemed to be preferable to include additional parking bays.</li> <li>• <u>Underground storage tanks</u> In order to make allowance for the preferred entry and exit points to the proposed fuel station, the location of the underground storage tanks had to be moved southwards. The new location would enable tankers to gain access to the underground tanks without limiting vehicular access in and around the proposed fuel station.</li> <li>• <u>Roundabout</u> A single-lane roundabout has been included in the site layout of the proposed fuel station (see Appendix B). The single-lane roundabout had been included in the site layout following consultations with the traffic specialist, who indicated that the single-lane roundabout would improve access to the fuel station.</li> </ul>	
<b>Provide a detailed motivation if no design or layout alternatives exist.</b>	
N/A	
<b>List the positive and negative impacts that the design alternatives will have on the environment.</b>	
See Section I below.	
<b>1.4.</b>	<b>Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.</b>
<b>Provide a description of the preferred technology alternative:</b>	
No technological alternatives have been considered for the proposed project.	
<b>Provide a description of any other technology alternatives investigated.</b>	
Technological alternatives are not applicable to the proposed project.	
<b>Provide a motivation for the preferred technology alternative.</b>	
Technological alternatives are not applicable to the proposed project.	
<b>Provide a detailed motivation if no alternatives exist.</b>	
No technological alternatives have been considered for the proposed project.	
<b>List the positive and negative impacts that the technology alternatives will have on the environment.</b>	
N/A.	
<b>1.5.</b>	<b>Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.</b>
<b>Provide a description of the preferred operational alternative.</b>	
No operational alternatives were identified.	
<b>Provide a description of any other operational alternatives investigated.</b>	
N/A.	
<b>Provide a motivation for the preferred operational alternative.</b>	
N/A.	
<b>Provide a detailed motivation if no alternatives exist.</b>	
No additional operational alternatives were considered, given that operational activities would be similar to the norm for similarly-sized fuel stations.	
<b>List the positive and negative impacts that the operational alternatives will have on the environment.</b>	
N/A.	
<b>1.6.</b>	<b>The option of not implementing the activity (the 'No-Go' Option).</b>
<b>Provide an explanation as to why the 'No-Go' Option is not preferred.</b>	
The No-Go Option means that the project would not proceed. Thus, the development of the site would not occur and would remain vacant until such time as an alternative land-use is identified for the site. It would also result in a lost business opportunity and an opportunity to	

generate a small amount of additional jobs. The community members that would benefit from a closer fuel station would also not benefit from this opportunity should it not proceed. While the significance of the negative impacts ranges from low to very low, no negative impacts would result with the No-Go options.

<b>1.7.</b>	<b>Provide an explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist.</b>
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No other alternatives were identified.

<b>1.8.</b>	<b>Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.</b>
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The outcome of alternatives investigated can be summarised as follows:

- In addition to the preferred site, three other site alternatives were identified.
- No alternative land uses have been identified as the fuel station forms part of the development vision of the greater Richmond Park.
- An initial layout alternative was considered however in order to address and meet the CCT's requirements for stacking distance and access, the layout was updated.
- No-Go option – there would be no change to the current situation and the site would remain vacant until such time as an alternative land-use is identified.

## 2. "NO-GO" AREAS

<b>Explain what "no-go" area(s) have been identified during identification of the alternatives and provide the co-ordinates of the "no-go" area(s).</b>
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No sensitive areas have been identified in close proximity to the site.
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### 3. METHODOLOGY TO DETERMINE THE SIGNIFICANCE RATINGS OF THE POTENTIAL ENVIRONMENTAL IMPACTS AND RISKS ASSOCIATED WITH THE ALTERNATIVES.

Describe the methodology to be used in determining and ranking the nature, significance, consequences, extent, duration of the potential environmental impacts and risks associated with the proposed activity or development and alternatives, the degree to which the impact or risk can be reversed and the degree to which the impact and risk may cause irreplaceable loss of resources.

The identification and assessment of environmental impacts is a multi-faceted process, using a combination of quantitative and qualitative descriptions and evaluations. It involves applying scientific measurements and professional judgement to determine the significance of environmental impacts associated with the proposed project. The process involves consideration of, *inter alia*: the purpose and need for the project; views and concerns of I&APs social and political norms, and general public interest.

#### 1. Identification and Description of Impacts

Identified impacts are described in terms of the nature of the impact, compliance with legislation and accepted standards, receptor sensitivity and the significance of the predicted environmental change (before and after mitigation). Mitigation measures may be existing measures or additional measures that were identified through the impact assessment and associated specialist input. The impact rating system considers the confidence level that can be placed on the successful implementation of mitigation.

#### 2. Evaluation of Impacts and Mitigation Measures

##### 2.1. Introduction

Impacts are assessed using SLR's standard convention for assessing the significance of impacts, a summary of which is provided below. In assigning significance ratings to potential impacts before and after mitigation the approach presented below is to be followed.

- Determine the impact consequence rating:** This is a function of the "intensity", "duration" and "extent" of the impact (see Section 2.2). The consequence ratings for combinations of these three criteria are given in Section 2.3.
- Determine impact significance rating:** The significance of an impact is a function of the consequence of the impact occurring and the probability of occurrence (see Section 2.2). Significance is determined using the table in Section 2.4.
- Modify significance rating (if necessary):** Significance ratings are based on largely professional judgement and transparent defined criteria. In some instances, therefore, whilst the significance rating of potential impacts might be "low", the importance of these impacts to local communities or individuals might be extremely high. The importance/value which interested and affected parties attach to impacts will be highlighted, and recommendations should be made as to ways of avoiding or minimising these perceived negative impacts through project design, selection of appropriate alternatives and / or management.
- Determine degree of confidence of the significance assessment:** Once the significance of the impact has been determined, the degree of confidence in the assessment will be qualified (see Section 2.2). Confidence in the prediction is associated with any uncertainties, for example, where information is insufficient to assess the impact.

##### 2.2. Criteria for Impact Assessment

The criteria for impact assessment are provided below.

Criteria	Rating	Description
Criteria for ranking of the INTENSITY (SEVERITY) of environmental impacts	ZERO TO VERY LOW	Negligible change, disturbance or nuisance. The impact affects the environment in such a way that natural functions and processes are not affected. People / communities are able to adapt with relative ease and maintain pre-impact livelihoods.
	LOW	Minor (Slight) change, disturbance or nuisance. The impact on the environment is not detectable or there is no perceptible change to people's livelihood.
	MEDIUM	Moderate change, disturbance or discomfort. Where the affected environment is altered, but natural functions and processes continue, albeit in a modified way. People/communities are able to adapt with some difficulty and maintain pre-impact livelihoods but only with a degree of support.
	HIGH	Prominent change, disturbance or degradation. Where natural functions or processes are altered to the extent that they will temporarily or permanently cease. Affected people/communities will not be able to adapt to changes or continue to maintain-pre impact livelihoods.
Criteria for ranking the DURATION of impacts	SHORT TERM	< 5 years.
	MEDIUM TERM	5 to < 15 years.
	LONG TERM	> 15 years, but where the impact will eventually cease either because of natural processes or by human intervention.

	<b>PERMANENT</b>	Where mitigation either by natural processes or by human intervention will not occur in such a way or in such time span that the impact can be considered transient.
<b>Criteria for ranking the EXTENT / SPATIAL SCALE of impacts</b>	<b>LOCAL</b>	Impact is confined to project or study area or part thereof, e.g. limited to the area of interest and its immediate surroundings.
	<b>REGIONAL</b>	Impact is confined to the region, e.g. coast, basin, catchment, municipal region, etc.
	<b>NATIONAL</b>	Impact is confined to the country as a whole, e.g. Namibia, etc.
	<b>INTERNATIONAL</b>	Impact extends beyond the national scale.
<b>Criteria for determining the PROBABILITY of impacts</b>	<b>IMPROBABLE</b>	Where the possibility of the impact to materialise is very low either because of design or historic experience, i.e. $\leq 30\%$ chance of occurring.
	<b>POSSIBLE</b>	Where there is a distinct possibility that the impact would occur, i.e. $> 30$ to $\leq 60\%$ chance of occurring.
	<b>PROBABLE</b>	Where it is most likely that the impact would occur, i.e. $> 60$ to $\leq 80\%$ chance of occurring.
	<b>DEFINITE</b>	Where the impact would occur regardless of any prevention measures, i.e. $> 80\%$ chance of occurring.
<b>Criteria for determining the DEGREE OF CONFIDENCE of the assessment</b>	<b>LOW</b>	$\leq 35\%$ sure of impact prediction.
	<b>MEDIUM</b>	$> 35\%$ and $\leq 70\%$ sure of impact prediction.
	<b>HIGH</b>	$> 70\%$ sure of impact prediction.
<b>Criteria for the DEGREE TO WHICH IMPACT CAN BE MITIGATED</b> - the degree to which an impact can be reduced / enhanced	<b>NONE</b>	No change in impact after mitigation.
	<b>VERY LOW</b>	Where the significance rating stays the same, but where mitigation will reduce the intensity of the impact.
	<b>LOW</b>	Where the significance rating drops by one level, after mitigation.
	<b>MEDIUM</b>	Where the significance rating drops by two to three levels, after mitigation.
	<b>HIGH</b>	Where the significance rating drops by more than three levels, after mitigation.
<b>Criteria for LOSS OF RESOURCES</b> - the degree to which a resource is permanently affected by the activity, i.e. the degree to which a resource is irreplaceable	<b>LOW</b>	Where the activity results in a loss of a particular resource but where the natural, cultural and social functions and processes are not affected.
	<b>MEDIUM</b>	Where the loss of a resource occurs, but natural, cultural and social functions and processes continue, albeit in a modified way.
	<b>HIGH</b>	Where the activity results in an irreplaceable loss of a resource.
<b>Criteria for REVERSIBILITY</b> - the degree to which an impact can be reversed	<b>IRREVERSIBLE</b>	Where the impact is permanent.
	<b>PARTIALLY REVERSIBLE</b>	Where the impact can be partially reversed.
	<b>FULLY REVERSIBLE</b>	Where the impact can be completely reversed.

### 2.3. Determining Consequence

Consequence attempts to evaluate the importance of a particular impact, and in doing so incorporates extent, duration and intensity. The ratings and description for determining consequence are provided below.

Rating	Description *
<b>VERY HIGH</b>	Impacts could be EITHER: of <b>high intensity</b> at a <b>regional level</b> and endure in the <b>long term</b> ; OR of <b>high intensity</b> at a <b>national level</b> in the <b>medium term</b> ; OR of <b>medium intensity</b> at a <b>national level</b> in the <b>long term</b> .

<b>HIGH</b>	Impacts could be EITHER: OR of <b>high intensity</b> at a <b>regional level</b> and endure in the <b>medium term</b> ; OR of <b>high intensity</b> at a <b>national level</b> in the <b>short term</b> ; OR of <b>medium intensity</b> at a <b>national level</b> in the <b>medium term</b> ; OR of <b>low intensity</b> at a <b>national level</b> in the <b>long term</b> ; OR of <b>high intensity</b> at a <b>local level</b> in the <b>long term</b> ; OR of <b>medium intensity</b> at a <b>regional level</b> in the <b>long term</b> .
<b>MEDIUM</b>	Impacts could be EITHER: OR of <b>high intensity</b> at a <b>local level</b> and endure in the <b>medium term</b> ; OR of <b>medium intensity</b> at a <b>regional level</b> in the <b>medium term</b> ; OR of <b>high intensity</b> at a <b>regional level</b> in the <b>short term</b> ; OR of <b>medium intensity</b> at a <b>national level</b> in the <b>short term</b> ; OR of <b>medium intensity</b> at a <b>local level</b> in the <b>long term</b> ; OR of <b>low intensity</b> at a <b>national level</b> in the <b>medium term</b> ; OR of <b>low intensity</b> at a <b>regional level</b> in the <b>long term</b> .
<b>LOW</b>	Impacts could be EITHER OR of <b>low intensity</b> at a <b>regional level</b> and endure in the <b>medium term</b> ; OR of <b>low intensity</b> at a <b>national level</b> in the <b>short term</b> ; OR of <b>high intensity</b> at a <b>local level</b> and endure in the <b>short term</b> ; OR of <b>medium intensity</b> at a <b>regional level</b> in the <b>short term</b> ; OR of <b>low intensity</b> at a <b>local level</b> in the <b>long term</b> ; OR of <b>medium intensity</b> at a <b>local level</b> and endure in the <b>medium term</b> .
<b>VERY LOW</b>	Impacts could be EITHER OR of <b>low intensity</b> at a <b>local level</b> and endure in the <b>medium term</b> ; OR of <b>low intensity</b> at a <b>regional level</b> and endure in the <b>short term</b> ; OR of <b>low to medium intensity</b> at a <b>local level</b> and endure in the <b>short term</b> . OR <b>Zero to very low intensity</b> with any combination of extent and duration.

\* Note: For any impact that is considered to be “Permanent” or “International” apply the “Long-Term” and “National” ratings, respectively.

#### 2.4. Determining Significance

The consequence rating is considered together with the probability of occurrence in order to determine the overall significance using the table below.

		PROBABILITY			
		IMPROBABLE	POSSIBLE	PROBABLE	DEFINITE
CONSEQUENCE	VERY LOW	INSIGNIFICANT	INSIGNIFICANT	VERY LOW	VERY LOW
	LOW	VERY LOW	VERY LOW	LOW	LOW
	MEDIUM	LOW	LOW	MEDIUM	MEDIUM
	HIGH	MEDIUM	MEDIUM	HIGH	HIGH
	VERY HIGH	HIGH	HIGH	VERY HIGH	VERY HIGH

In certain cases it may not be possible to determine the significance of an impact. In these instances the significance is **UNKNOWN**.

### 4. ASSESSMENT OF EACH IMPACT AND RISK IDENTIFIED FOR EACH ALTERNATIVE

**Note:** The following table serves as a guide for summarising each alternative. The table should be repeated for each alternative to ensure a comparative assessment. The EAP may decide to include this section as Appendix J to this BAR.

#### 4.1. PROJECT-RELATED IMPACTS (CONSTRUCTION AND OPERATIONAL PHASES)

This section describes and assesses the significance of potential impacts related to the proposed development of a fuel station i.e. the proposed storage of hazardous substances. Only additional project issues and impacts not previously assessed as part of the previous EIA

process would be described and addressed. Thus, the impacts related to vegetation, freshwater and cultural heritage assessed as part of the previous EIA process will not be repeated here.

#### 4.1.1 Construction Phase

##### 4.1.1.1 Nuisance impacts (dust, noise, visual)

Criteria	Description
<b>Nature of impact:</b>	Construction activities would result in a localised increase in dust, noise levels and visual impacts. These impacts may be a nuisance to local residents. The closest residential suburb is Bothasig which is situated 100 m south of the proposed development. Astron Energy and SFF are located 850 m west and 320 m east of the proposed site, respectively.  Although the intensity of these impacts could be high at times during construction, the overall construction period would be over the short-term. As the proposed fuel station would be separated from the nearest residential area by Platteklouf Road, the intensity of these potential nuisance impacts may be reduced.
<b>Extent and duration of impact:</b>	Local and short-term
<b>Intensity of impact or risk:</b>	High
<b>Consequence of impact or risk:</b>	Low
<b>Probability of occurrence:</b>	Definite
<b>Degree to which the impact may cause irreplaceable loss of resources:</b>	Low
<b>Degree to which the impact can be reversed:</b>	Fully reversible
<b>Indirect Impacts:</b>	None
<b>Cumulative impact prior to mitigation:</b>	Low
<b>Significance rating of impact prior to mitigation</b>	<b>Low</b>
<b>Degree to which the impact can be avoided:</b>	Low to Medium
<b>Degree to which the impact can be managed:</b>	Medium
<b>Degree to which the impact can be mitigated:</b>	Medium
<b>Proposed mitigation:</b>	<ul style="list-style-type: none"> <li>• Minimise dust generation by implementing a dust control programme (e.g. wetting of areas being disturbed).</li> <li>• Limit stockpile heights to 2 m and protect exposed soils and materials against wind.</li> <li>• Adhere to local municipal by-laws regarding the generation of noise and working hours.</li> <li>• Ensure that all construction-related materials are stockpiled / stored in a neat and orderly fashion.</li> <li>• Ensure that the boundary of the site is fenced off prior to construction.</li> <li>• Maintain all construction machinery and vehicles in good working order.</li> <li>• Maintain a grievance procedure and address grievance timeously.</li> </ul>
<b>Residual impacts:</b>	Isolated incidents of nuisance factors such as noise and dust may still occur despite the implementation of appropriate mitigation measures.
<b>Cumulative impact post mitigation:</b>	Very Low
<b>Significance rating of impact after mitigation</b>	<b>VERY LOW</b>

##### 4.1.1.2 Creation of employment opportunities

Criteria	Description
<b>Nature of impact:</b>	The proposed project would create approximately 100 (skilled and unskilled) employment opportunities during the construction phase. This is a positive impact; however, the employment opportunities would be temporary in nature.
<b>Extent and duration of impact:</b>	Local and short-term
<b>Consequence of impact or risk:</b>	Very Low
<b>Intensity of impact or risk:</b>	Low

<b>Probability of occurrence:</b>	Definite
<b>Degree to which the impact may cause irreplaceable loss of resources:</b>	N/A
<b>Degree to which the impact can be reversed:</b>	N/A
<b>Indirect impacts:</b>	Income from employment would contribute to improving quality of life of employees and employees' dependents, albeit for a short period of time.
<b>Cumulative impact prior to mitigation:</b>	Very low
<b>Significance rating of impact prior to enhancement:</b>	<b>Very Low (positive)</b>
<b>Degree to which the impact can be avoided:</b>	N/A
<b>Degree to which the impact can be managed:</b>	Low
<b>Degree to which the impact can be enhanced:</b>	Low
<b>Proposed enhancement:</b>	<ul style="list-style-type: none"> <li>As far as possible, employ local Broad-Based Black Economic Empowerment services and providers and local labour from the local community.</li> <li>Ensure that, where required, appropriate training is provided.</li> </ul>
<b>Residual impacts:</b>	N/A
<b>Cumulative impact post mitigation:</b>	Very low (positive)
<b>Significance rating of impact after mitigation</b>	<b>VERY LOW (POSITIVE)</b>

#### 4.1.1.3 Traffic impacts

Criteria	Description
<b>Nature of impact:</b>	Traffic on Platteklouf and / or Tygerberg Valley Road, as well as internal roads within the Southern Precinct of Richmond Park could experience minor delays due to construction vehicles accessing the site. However, this is considered to be a low intensity impact, given that anticipated volumes of construction-related traffic on these roads (particularly Platteklouf Road) would be low in comparison to normal traffic.
<b>Extent and duration of impact:</b>	Local and short-term
<b>Consequence of impact or risk:</b>	Very Low
<b>Intensity of impact or risk:</b>	Low
<b>Probability of occurrence:</b>	Probable
<b>Degree to which the impact may cause irreplaceable loss of resources:</b>	N/A
<b>Degree to which the impact can be reversed:</b>	Fully reversible
<b>Indirect impacts:</b>	None
<b>Cumulative impact prior to mitigation:</b>	Very low
<b>Significance rating of impact prior to mitigation</b>	<b>Very Low</b>
<b>Degree to which the impact can be avoided:</b>	Low
<b>Degree to which the impact can be managed:</b>	High
<b>Degree to which the impact can be mitigated:</b>	High
<b>Proposed enhancement:</b>	<ul style="list-style-type: none"> <li>Vehicle movement shall be limited to the defined access route.</li> <li>All vehicles shall comply with speed limits.</li> <li>Erect sufficient warning signage near the entry point to the site.</li> <li>Ensure the site has adequate traffic control measures in place at the entrance to the site.</li> <li>Schedule delivery of construction materials outside of peak morning (6am to 9am) and evening (3pm to 6pm) traffic times.</li> </ul>
<b>Residual impacts:</b>	N/A
<b>Cumulative impact post mitigation:</b>	Very low
<b>Significance rating of impact after mitigation</b>	<b>VERY LOW</b>

4.1.1.4 Groundwater impacts

Criteria	Description
<b>Nature of impact:</b>	<p>The handling and storage of hazardous substances and the batching of concrete during the construction phase increases the potential occurrence of spillages. Spillages have the potential to leak into the ground hereby leading to the contamination of groundwater resources. The sensitivity of the site to groundwater contamination is increased given the medium to high permeability of subsoils.</p> <p>Although the intensity of these impacts could be high at times during construction, the overall construction period would be over the short-term and the implementation of mitigation measures would effectively mitigate impact. Additionally, the risk to groundwater users is classified as <u>medium</u>, as the <u>hydrocensus identified eight boreholes within a 500 m radius of the site. However, these boreholes are predominantly used for irrigation purposes.</u></p>
<b>Extent and duration of impact:</b>	Local and short-term
<b>Intensity of impact or risk:</b>	High
<b>Consequence of impact or risk:</b>	Low
<b>Probability of occurrence:</b>	Improbable
<b>Degree to which the impact may cause irreplaceable loss of resources:</b>	Very low
<b>Degree to which the impact can be reversed:</b>	Partially reversible
<b>Indirect impacts:</b>	None
<b>Cumulative impact prior to mitigation:</b>	None
<b>Significance rating of impact prior to mitigation</b>	<b>Very Low</b>
<b>Degree to which the impact can be avoided:</b>	High
<b>Degree to which the impact can be managed:</b>	High
<b>Degree to which the impact can be mitigated:</b>	High
<b>Proposed mitigation:</b>	<ul style="list-style-type: none"> <li>• The Contractor shall ensure that its employees are aware of the procedure to be followed for dealing with accidental leaks and spills.</li> <li>• All fuel, oil and other hazardous substances shall be confined to demarcated, adequately bunded areas within the construction and stored in suitable containers / storage facilities.</li> <li>• Suitable warning signs indicating the nature of the stored materials shall be displayed at the storage facility.</li> <li>• Drip trays or similar forms of secondary containment shall be provided for stationary plant (such as compressors, pumps, generators, etc.) and for "parked" plant (e.g. excavators, hauling trucks, etc.).</li> <li>• Where reasonably practical, plant and vehicles shall only be refuelled in a demarcated refuelling / servicing area using suitable equipment (e.g. pumps, funnels, etc).</li> <li>• The surface under the refuelling area shall be protected against pollution (e.g. the use of drip trays, concrete sump, etc.).</li> <li>• The Contractor shall ensure that a suitable hydrocarbon spill clean-up kits are readily available at refuelling areas.</li> <li>• All vehicles and equipment shall be kept in good working order and serviced regularly. Leaking equipment shall be repaired immediately or moved to a suitable contained area.</li> <li>• When servicing equipment, drip trays shall be used during the collection of waste oil and other hazardous substances (e.g. coolants, fuel, grease, etc.).</li> <li>• Cement and concrete mixing directly on the ground shall not be allowed and shall take place on impermeable surfaces.</li> <li>• Unused (full) cement bags shall be stored undercover and away from surface runoff. Used (empty) cement bags shall be collected and stored in weatherproof containers.</li> <li>• All excess concrete shall be removed from site on completion of concrete works and disposed of.</li> </ul>

Criteria	Description
	<ul style="list-style-type: none"> <li>Washing of the excess cement / concrete into the ground shall not be allowed.</li> </ul>
<b>Residual impacts:</b>	Isolated incidents of hydrocarbon spillages may still occur despite the implementation of appropriate mitigation measures.
<b>Cumulative impact post mitigation:</b>	None
<b>Significance rating of impact after mitigation</b>	<b>VERY LOW</b>

#### 4.1.2 Operational Impacts

##### 4.1.2.1 Nuisance impacts (noise, visual and air quality)

Criteria	Description
<b>Nature of impact:</b>	<p>During operation, some noise may be generated associated with general operations at the fuel station such as the presence of vehicles. However, such noise is not anticipated to be significantly louder than the ambient noise associated with the existing traffic on Platteklouf Road. As the other adjacent land uses are largely commercial/industrial in nature, no noise-related disturbance is anticipated on these other surrounding land uses.</p> <p>The intensity of the impact of these anticipated emissions is not considered to be high considering the level of traffic located on the surrounding road network and the proximity of the existing Astron Energy Refinery and the SFF Tank Farm.</p> <p>Visually, the proposed project would be visible from Platteklouf Road and from the Retail Centre located within Richmond Park. It is not expected that the fuel station would be out of character in relation to the surrounding land uses.</p>
<b>Extent and duration of impact:</b>	Local and long-term
<b>Intensity of impact or risk:</b>	Low to Medium
<b>Consequence of impact or risk:</b>	Low to Medium
<b>Probability of occurrence:</b>	Definite
<b>Degree to which the impact may cause irreplaceable loss of resources:</b>	None
<b>Degree to which the impact can be reversed:</b>	N/A
<b>Indirect impacts:</b>	None
<b>Cumulative impact prior to mitigation:</b>	None
<b>Significance rating of impact prior to mitigation</b>	<b>Low to Medium</b>
<b>Degree to which the impact can be avoided:</b>	Medium
<b>Degree to which the impact can be managed:</b>	High
<b>Degree to which the impact can be mitigated:</b>	Medium
<b>Proposed mitigation:</b>	<ul style="list-style-type: none"> <li>Ensure that any lighting and advertising installed on the site complies with relevant standards.</li> <li>Landscape the site to improve visual aspects.</li> <li>Any significant leaks or spill incidents must be investigated by a suitably qualified specialist to assess the resultant vapour, air, soil and/or groundwater impacts.</li> </ul>
<b>Residual impacts:</b>	Isolated incidents of noise may still occur despite the implementation of appropriate mitigation measures.
<b>Cumulative impact post mitigation:</b>	None
<b>Significance rating of impact after mitigation</b>	<b>LOW</b>

##### 4.1.2.2 Employment opportunities

Criteria	Description
<b>Nature of impact:</b>	The proposed project would create approximately 35 permanent employment opportunities for customer service agents on the forecourt, staff at the convenience store kiosk as well as other administrative staff. Given that the

	number of employment opportunities is relatively small, but permanent in nature, this is a positive impact of low intensity.
<b>Extent and duration of impact:</b>	Local and long-term
<b>Consequence of impact or risk:</b>	Low
<b>Intensity of impact or risk:</b>	Low
<b>Probability of occurrence:</b>	Definite
<b>Degree to which the impact may cause irreplaceable loss of resources:</b>	N/A
<b>Degree to which the impact can be reversed:</b>	N/A
<b>Indirect impacts:</b>	Income from employment would contribute to improving quality of life of employees and employees' dependents.
<b>Cumulative impact prior to mitigation:</b>	Low
<b>Significance rating of impact prior to enhancement:</b>	<b>Low (positive)</b>
<b>Degree to which the impact can be enhanced:</b>	Low
<b>Proposed enhancement:</b>	<ul style="list-style-type: none"> <li>As far as possible, employ local BEE services and providers and local labour from the local community.</li> <li>Ensure that, where required, appropriate training is provided.</li> </ul>
<b>Residual impacts:</b>	N/A
<b>Cumulative impact post mitigation:</b>	Low (positive)
<b>Significance rating of impact after mitigation</b>	<b>LOW (POSITIVE)</b>

#### 4.1.2.3 Traffic impacts

Criteria	Description
<b>Nature of impact:</b>	The operation of the fuel station is not anticipated to change the existing traffic volumes on Platteklouf, Tygerberg Valley and other internal roads in Richmond Park. As the layout of the proposed project has been designed to take into consideration the relevant CCT vehicle stacking requirements, no interruptions to the flow of traffic on Platteklouf Road are expected. Thus, the impact on local traffic is deemed to be of low intensity over the duration of operations. No impact is expected on pedestrians and cyclists, given the implementation of the proposed mitigation measures provided by the traffic specialist, which included the provision of pedestrian sidewalks and walkways along all road site frontages and also on site.
<b>Extent and duration of impact:</b>	Local and long-term
<b>Consequence of impact or risk:</b>	Low
<b>Intensity of impact or risk:</b>	Low
<b>Probability of occurrence:</b>	Probable
<b>Degree to which the impact may cause irreplaceable loss of resources:</b>	N/A
<b>Degree to which the impact can be reversed:</b>	Partially reversible
<b>Indirect impacts:</b>	None
<b>Cumulative impact prior to mitigation:</b>	Very low
<b>Significance rating of impact prior to mitigation</b>	<b>Low</b>
<b>Degree to which the impact can be mitigated:</b>	Low
<b>Proposed mitigation:</b>	<ul style="list-style-type: none"> <li>Large fuel tankers shall not obstruct traffic flow in and out of the fuel station during refuelling.</li> <li>Large fuel tankers shall, insofar as possible, refuel during low peak traffic hours, so as to limit potential disturbance.</li> <li>Develop appropriate pedestrian access to the site.</li> </ul>
<b>Residual impacts:</b>	N/A
<b>Cumulative impact post mitigation:</b>	None
<b>Significance rating of impact after mitigation</b>	<b>VERY LOW</b>

4.1.2.4 Impacts on groundwater

Criteria	Description
<b>Nature of impact:</b>	Fuel would be stored in underground storage tanks with a combined capacity of 120 m <sup>3</sup> . Undetected leakages from underground storage tanks could result in significant groundwater contamination. The sensitivity of the site to groundwater contamination is increased given the medium to high permeability of subsoils <u>which implies that there is potential for future source concentrations to migrate at relatively high velocities and long distances. As there are groundwater abstraction points located within a 300 m radius of the site, there is potential risk to off-site groundwater users, should there be any future environmental releases of fuel during the operation of the proposed fuel service station. Based on the calculated groundwater flow direction (north east), the boreholes identified during the hydrocensus are considered to be hydraulically upgradient of the planned tank farm.</u> <u>The geohydrological site assessment concluded that the site is suitable for the establishment as a retail petrol and diesel filling station provided that the recommended contamination risk mitigation measures (see below) are implemented.</u>
<b>Extent and duration of impact:</b>	Local and long-term
<b>Consequence of impact or risk:</b>	Low to Medium
<b>Intensity of impact or risk:</b>	Low to Medium
<b>Probability of occurrence:</b>	Possible
<b>Degree to which the impact may cause irreplaceable loss of resources:</b>	Medium
<b>Degree to which the impact can be reversed:</b>	Partially reversible
<b>Indirect impacts:</b>	None
<b>Cumulative impact prior to mitigation:</b>	None
<b>Significance rating of impact prior to mitigation</b>	<b>Very Low to Low</b>
<b>Degree to which the impact can be avoided:</b>	High
<b>Degree to which the impact can be managed:</b>	High
<b>Degree to which the impact can be mitigated:</b>	High
<b>Proposed mitigation:</b>	<ul style="list-style-type: none"> <li>• <u>Undertake routine groundwater monitoring through the existing monitoring network once the site becomes operational to proactively ensure no detrimental impacts occur at the site.</u></li> <li>• Adhere to industry norms relating to the design, construction and maintenance of fuel stations and underground storage tanks, as set out in SABS code SABS1535 and SABS1830.</li> <li>• An automated tank gauging system / device must be installed.</li> <li>• A minimum of six leak wells to be installed. Observation wells are recommended to be installed vertically to a depth that penetrates the water aquifer without any curvature, in order to facilitate easy collection of samples.</li> <li>• Integrity tests of the underground storage tanks and associated underground piping to be conducted annually or prior to the installation or following any repairs / maintenance / upgrades.</li> <li>• Each fuel dispensing unit to be protected by a concrete / brick plinth / pump island projecting ≥ 300 mm from the base and of height ≥ 150 mm above the finished floor level.</li> <li>• Each pumping system to have a leak detector that automatically checks the integrity of the pipework on the pressure side of the pump at a minimum leak rate of 11.5 L/hr at 70 kPa.</li> <li>• Each dispenser to be fitted with an emergency shut-off valve that incorporates a shear section and has its body anchored rigidly below the dispenser in accordance with the manufacturer's specification.</li> <li>• Sub-surface conditions of the soil to be verified and subsoil profiles to be recorded during the installation of the fuel infrastructure.</li> <li>• Any significant leaks or spill incidents must be investigated by a suitably qualified specialist. During the investigation, groundwater monitoring should be undertaken downgradient of potential source areas to collect groundwater samples and verify groundwater flow direction. The</li> </ul>

	<p>investigation must also include a hydro census to determine any potential unlicensed / licensed borehole users within a 500 m radius of the spill/leak.</p> <ul style="list-style-type: none"> <li>• Tankers to offload fuel into underground tanks by means of gravity filling unless an engineered system / adaptor is fitted that prevents excess pressure being placed on the tank.</li> <li>• Safety signs at fuel dispensing points and tank vent pipes to be erected.</li> <li>• Chemical spill kits to be kept on site at an easily accessible location at all times.</li> </ul>
<b>Residual impacts:</b>	Isolated incidents of hydrocarbon spillages may still occur despite the implementation of appropriate mitigation measures.
<b>Cumulative impact post mitigation:</b>	None
<b>Significance rating of impact after mitigation</b>	<b>VERY LOW</b>

#### 4.1.2.5 Fire, health and safety

Criteria	Description
<b>Nature of impact:</b>	The proposed fuel station has a potential fire risk associated with the fuel (flammable liquids) and electrical equipment used on site. A fire could impact on the health and safety of the employees as well as patrons of the fuel station. Given that the impact would directly affect human life, this potential impact is deemed to be of a high intensity although the likelihood of it occurring is very low.
<b>Extent and duration of impact:</b>	Local and long-term
<b>Consequence of impact or risk:</b>	High
<b>Intensity of impact or risk:</b>	High
<b>Probability of occurrence:</b>	Improbable
<b>Degree to which the impact may cause irreplaceable loss of resources:</b>	High
<b>Degree to which the impact can be reversed:</b>	N/A
<b>Indirect impacts:</b>	Loss of life, loss of income
<b>Cumulative impact prior to mitigation:</b>	None
<b>Significance rating of impact prior to mitigation</b>	<b>Medium</b>
<b>Degree to which the impact can be avoided:</b>	High
<b>Degree to which the impact can be managed:</b>	Medium
<b>Degree to which the impact can be mitigated:</b>	Medium
<b>Proposed mitigation:</b>	<ul style="list-style-type: none"> <li>• Establish an emergency fire response plan.</li> <li>• Ensure that all personnel are properly trained in emergency response.</li> <li>• Ensure that all firefighting equipment complies with the Oil Industry Standards.</li> <li>• Ensure all emergency numbers are visible and easily accessible to all personnel.</li> </ul>
<b>Residual impacts:</b>	An emergency situation and may still arise despite the implementation of mitigation measures.
<b>Cumulative impact post mitigation:</b>	Now
<b>Significance rating of impact after mitigation</b>	<b>LOW</b>

#### 4.1.3 Decommissioning and Closure Phase

It is not anticipated that the fuel station would be decommissioned within the near future. Should decommissioning or closure of the fuel station occur, the necessary investigations and applications, as relevant at the time, would be undertaken prior to the initiation of any decommissioning activities.

#### 4.1.4 No-Go Alternative

<b>POTENTIAL IMPACTS OF THE NO-GO ALTERNATIVE</b>	
<b>Criteria</b>	<b>Description</b>
<b>Nature of impact:</b>	The No-Go Option means that the project would not proceed. Thus, the development of the site would not occur and would remain vacant until such time as an alternative land-use is identified for the site. It would also result in a lost business opportunity and an opportunity to generate a small amount of additional jobs. The community members that would benefit from a closer fuel station would also not benefit from this opportunity should it not proceed. While the significance of the negative impacts ranges from low to very low, no negative impacts would result with the No-Go options.
<b>Extent and duration of impact:</b>	Local, long-term
<b>Consequence of impact or risk:</b>	Low
<b>Intensity of impact or risk:</b>	Low
<b>Probability of occurrence:</b>	Possible
<b>Degree to which the impact may cause irreplaceable loss of resources:</b>	Low
<b>Degree to which the impact can be reversed:</b>	Reversible
<b>Indirect impacts:</b>	N/A
<b>Cumulative impact prior to mitigation:</b>	N/A
<b>Significance rating of impact prior to mitigation</b>	<b>Very Low</b>
<b>Degree to which the impact can be avoided:</b>	Medium
<b>Degree to which the impact can be managed:</b>	Medium
<b>Degree to which the impact can be mitigated:</b>	Medium
<b>Proposed mitigation:</b>	N/A
<b>Residual impacts:</b>	N/A
<b>Cumulative impact post mitigation:</b>	N/A
<b>Significance rating of impact after mitigation</b>	<b>VERY LOW</b>

## SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

<b>1.</b>	<p><b>Provide a summary of the findings and impact management measures identified by all Specialists and an indication of how these findings and recommendations have influenced the proposed development.</b></p> <p>Only two specialist studies were undertaken to assess the impact on groundwater and traffic.</p> <p><u>Geohydrological site assessment</u></p> <p>Based on the assessment of the groundwater risks associated with the site, the following was noted:</p> <ul style="list-style-type: none"> <li>• <u>The topography and gradient of the Site (prior to Site development) is generally flat, with a slight slope towards the west to north west. The topography and gradient of the surrounding area slopes to the west south west. Previously vacant, the site has subsequently been cleared and graded as part of the bulk earthworks undertaken as part of the approved Richmond Park development.</u></li> <li>• <u>Nearby off-site potential contamination sources include Astron Energy Refinery (located from 780 m to 1.74 km northwest), SFF tank farm (located from 195 m to 1.37 km east) and Engen De Grendel Service Station (located from 350 m to 430 m south) of the Site.</u></li> <li>• <u>Groundwater was encountered between 1.52 m and 1.99 m bgl. The in-field parameters reveal pH values of 6.59 to 6.98, which are indicative of an acidic to neutral background. The Dissolved Oxygen values were measured from 0 mg/L to 2.8 mg/L, which are indicative of anaerobic subsurface conditions across the Site. Oxidation Reduction Potential values ranged between -77 mV and -7 mV, indicating more reducing conditions at monitoring well installed on the southern portion of the site. Organic compounds were not recorded above laboratory detection limits in any of the collected soil and groundwater samples. Inorganic compounds and metals were observed at concentrations below the adopted Tier 1 screening levels.</u></li> <li>• <u>The calculated groundwater flow direction is towards the north east, and inconsistent with the topography generally towards the west.</u></li> <li>• <u>The potential onsite vapour inhalation risk is classified as medium, as the proposed office/shop building will be on the eastern portion of the site, down-gradient to the fuel infrastructure. The risk to groundwater users is classified as medium, as private boreholes used for domestic purposes were identified south of the site. However, the calculated groundwater flow direction is to the north east; thus, the hydrocensus boreholes located south of the Site are considered to be hydraulically upgradient of the planned underground storage tanks.</u></li> </ul> <p><u>Traffic Impact Assessment</u></p> <p>Based on the assessment of the projected traffic associated with the site, the following was noted:</p> <ul style="list-style-type: none"> <li>• <u>The proposed filling station is not expected to generate a significant number of public transport trips. The existing and planned future public transport facilities would be sufficient to accommodate the expected public transport demand of this development. Hence, no additional public transport facilities are proposed.</u></li> <li>• <u>On-site parking should be provided according to the rates recommended in the “Minimum Off-Street Parking Requirements” from the City of Cape Town (which equates to 23 parking bays. As 41 parking bays would be provided, sufficient on-site parking would be available.</u></li> <li>• <u>Various nearby link upgrades are expected to result in changes to the existing traffic patterns and distribution in the area. It is likely that once this full road network is in place, that the traffic volumes along Tygerberg Valley Road could reduce. However, the remaining development potential in this area might again take up the available spare capacity, resulting in similar traffic volumes (than evaluated in this report) along the study road sections. The western terminal of the Refinery interchange currently operates at unacceptable Levels-of Service during the peak hours. Upgrade of this interchange will commence in September 2021. This interchange would operate acceptably, once this upgrade is in place. All other intersections investigated are expected to continue to operate acceptably. Hence, no road upgrades are required or proposed for the project. However, a single lane roundabout is proposed at the Upper Southern Precinct Blvd. / Mall Access Road intersection, to ensure acceptable long-term operations.</u></li> <li>• <u>With respect to trip generation, 83- / 160 total trips would be captured / generated during weekday AM / PM peak hours respectively. Only 24 nett-new trips would be generated during the PM peak hour or only 20 nett-new trips when including a 15% Public Transport reduction, as agreed with the City of Cape Town officials.</u></li> <li>• <u>Based on this investigation, it is evident that the expected transport impacts from the proposed filling station development on Erf 38333 could be sufficiently mitigated, provided that the upgrades as discussed in this report are in place. Hence, it is recommended that this development be considered for approval, from a transport point of view.</u></li> </ul>
<b>2.</b>	<p><b>List the impact management measures that were identified by all Specialists that will be included in the EMPr</b></p> <p>The following mitigation measures were suggested by the groundwater specialist. Where relevant, these have been consolidated, grouped or rephrased differently in this report and / or the EMPr in order ensure that the language and terminology used is consistent (see Appendix H):</p>

- Adhere to industry norms relating to the design, construction and maintenance of fuel stations and underground storage tanks, as set out in SABS code SABS1535 and SABS1830.
- An automated tank gauging system / device to be installed.
- A minimum of six leak wells to be installed. Observation wells are recommended to be installed vertically to a depth that penetrates the water aquifer without any curvature, in order to facilitate easy collection of samples.
- Integrity tests of the underground storage tanks and associated underground piping to be conducted annually or prior to the installation or following any repairs / maintenance / upgrades.
- Each fuel dispensing unit to be protected by a concrete / brick plinth / pump island projecting  $\geq 300$  mm from the base and of height  $\geq 150$  mm above the finished floor level.
- Each pumping system to have a leak detector that automatically checks the integrity of the pipework on the pressure side of the pump at a minimum leak rate of 11.5 L/hr at 70 kPa.
- Each dispenser to be fitted with an emergency shut-off valve that incorporates a shear section and has its body anchored rigidly below the dispenser in accordance with the manufacturer's specification.
- Any significant leaks or spill incidents must be investigated by a suitably qualified specialist. During the investigation, groundwater monitoring should be undertaken downgradient of potential source areas to collect groundwater samples and verify groundwater flow direction. The investigation must also include a hydro census to determine any potential unlicensed / licensed borehole users within a 500 m radius of the spill/leak.
- Tankers to offload fuel into underground tanks by means of gravity filling unless an engineered system / adaptor is fitted that prevents excess pressure being placed on the tank.
- Safety signs at fuel dispensing points and tank vent pipes to be erected.
- Chemical spill kits to be kept on site at an easily accessible location at all times.
- The forecourt and driveway area around the fuel dispensing units to be graded that effluent run-off will not flow into the streets and stormwater systems, without first passing through the gravity separator.

The following mitigation measures were suggested by the traffic specialist. Where relevant, these have been consolidated, grouped or rephrased differently in this report and / or the EMPr in order ensure that the language and terminology used is consistent (see Appendix H):

- Construct a single-lane roundabout at the Upper Southern Precinct Boulevard / Richmond Corner Mall Access Road intersection.
- Provide pedestrian sidewalks along all road site frontages.
- Provide pedestrian walkways on site.

<b>3.</b>	<b>List the specialist investigations and the impact management measures that will not be implemented and provide an explanation as to why these measures will not be implemented.</b>
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N/A.

<b>4.</b>	<b>Explain how the proposed development will impact the surrounding communities.</b>
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Key impacts on neighbouring residents would be nuisance impacts (e.g. air quality, noise and visual) and traffic impacts during construction. However, these impacts were assessed to have a very low impact significance of very low during the construction phase.

During operation, key impacts on neighbouring residents would relate to nuisance (e.g. air quality, noise and visual), traffic, groundwater and fire, safety and security impacts. these impacts were assessed to have an impact significance of low, very low, very low and low, respectively, during the operation phase.

<b>5.</b>	<b>Explain how the risk of climate change may influence the proposed activity or development and how has the potential impacts of climate change been considered and addressed.</b>
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Due to the small scale and nature of the proposed project, the risks of climate change have not been considered in the project design. Nevertheless, no specific risks to the project as a result of climate change are anticipated.

<b>6.</b>	<b>Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved.</b>
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No conflicting recommendations have been proposed.

<b>7.</b>	<b>Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development.</b>
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The various findings and recommendations have led to the development of the proposed project layout and the recommended mitigation measures have been incorporated into the EMPr.

<b>8.</b>	<b>Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.</b>
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The mitigation hierarchy has been considered in the selection of the proposed site locality and the development of the proposed project layout. Refer to Section H for a discussion on the project location and project layout alternatives that were considered and how the various layout iterations were arrived to, after further consideration of the specialist assessments.

## SECTION J: GENERAL

### 1. ENVIRONMENTAL IMPACT STATEMENT

<b>1.1.</b>	<b>Provide a summary of the key findings of the EIA.</b>																																							
<p>The majority of the impacts are expected to be of <b>VERY LOW</b> to <b>LOW</b> significance after mitigation. Socio-economic benefits related to potential employment opportunities are rated as <b>VERY LOW (POSITIVE)</b> during the construction phase, and <b>LOW (POSITIVE)</b> during the operational phase, due to the temporary and permanent nature of the opportunities, respectively. Impacts related to traffic are deemed to be <b>VERY LOW</b> during both the construction and operational phases.</p> <p>Construction activities would result in a localised increase in dust, noise levels and visual impacts. These impacts may be a nuisance to local residents. During operation, some noise may be generated from general operational activities and air quality may be impacted by emissions released from vehicles refuelling at the fuel station. The nuisance impacts (air quality, noise and visual) during the construction and operation phases are expected to be of a <b>VERY LOW</b> and <b>LOW</b> significance after mitigation for the construction and operation phases, respectively.</p> <p>During construction the handling and storage of hazardous substances and the batching of concrete increases the potential occurrence of spillages, which could impact groundwater resources. During operation, potential leakages from underground storage tanks may contaminate groundwater resources. With the implementation of appropriate mitigation measures, the impact on groundwater resources are deemed to be <b>VERY LOW</b> during the construction and operational phases.</p> <p>The proposed fuel station has a potential fire risk associated with the fuel (flammable liquids) and electrical equipment used on site. A fire could impact on the health and safety of the employees as well as patrons of the fuel station. With effective measures put in place, the significance of the impact is deemed <b>LOW</b> after mitigation.</p> <p>The No-Go Option means that the project would not proceed and none of the above-mentioned impacts would take place. From a botanical, freshwater and cultural-heritage perspective, there is no difference between the project proceeding or the no-go alternative as no vegetation, water resources and artefacts of cultural-heritage significance are present on site. From a socio-economic perspective, there would be no contribution to the local economy or improvement in livelihoods would take place. For these reasons, the No-Go alternative is deemed to have a <b>VERY LOW</b> significance after mitigation.</p>																																								
<b>1.2.</b>	<b>Provide a map that that superimposes the preferred activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. (Attach map to this BAR as Appendix B2)</b>																																							
<p>No environmental sensitivities were identified in close proximity to the proposed site. A biodiversity overlay map is attached as Appendix D.</p>																																								
<b>1.3.</b>	<b>Provide a summary of the positive and negative impacts and risks that the proposed activity or development and alternatives will have on the environment and community.</b>																																							
<p>A summary of the positive and negative impacts identified for the proposed project is provided below:</p> <p><b>Table 1: Construction-related Impacts.</b></p> <table border="1"> <thead> <tr> <th>Impact</th> <th>Significance without mitigation</th> <th>Significance with mitigation</th> </tr> </thead> <tbody> <tr> <td>Nuisance (air quality, noise and visual)</td> <td>Low</td> <td>VERY LOW</td> </tr> <tr> <td>Creation of temporary employment opportunities</td> <td>Very Low (positive)</td> <td>VERY LOW (POSITIVE)</td> </tr> <tr> <td>Traffic</td> <td>Very Low</td> <td>VERY LOW</td> </tr> <tr> <td>Groundwater</td> <td>Very Low</td> <td>VERY LOW</td> </tr> </tbody> </table> <p><b>Table 2: Operation-related impacts.</b></p> <table border="1"> <thead> <tr> <th>Impact</th> <th>Significance without mitigation</th> <th>Significance with mitigation</th> </tr> </thead> <tbody> <tr> <td>Nuisance (air quality, noise and visual)</td> <td>Low to Medium</td> <td>LOW</td> </tr> <tr> <td>Creation of temporary employment opportunities</td> <td>Low (positive)</td> <td>LOW (POSITIVE)</td> </tr> <tr> <td>Traffic</td> <td>Low</td> <td>VERY LOW</td> </tr> <tr> <td>Groundwater</td> <td>Very Low to Low</td> <td>VERY LOW</td> </tr> <tr> <td>Fire, health and safety</td> <td>Medium</td> <td>LOW</td> </tr> </tbody> </table> <p><b>Table 3: Impacts associated with the no-go option.</b></p> <table border="1"> <thead> <tr> <th>Impact</th> <th>Significance without mitigation</th> <th>Significance with mitigation</th> </tr> </thead> <tbody> <tr> <td>No-Go Alternative</td> <td>Very Low</td> <td>VERY LOW</td> </tr> </tbody> </table>		Impact	Significance without mitigation	Significance with mitigation	Nuisance (air quality, noise and visual)	Low	VERY LOW	Creation of temporary employment opportunities	Very Low (positive)	VERY LOW (POSITIVE)	Traffic	Very Low	VERY LOW	Groundwater	Very Low	VERY LOW	Impact	Significance without mitigation	Significance with mitigation	Nuisance (air quality, noise and visual)	Low to Medium	LOW	Creation of temporary employment opportunities	Low (positive)	LOW (POSITIVE)	Traffic	Low	VERY LOW	Groundwater	Very Low to Low	VERY LOW	Fire, health and safety	Medium	LOW	Impact	Significance without mitigation	Significance with mitigation	No-Go Alternative	Very Low	VERY LOW
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No-Go Alternative	Very Low	VERY LOW																																						

## 2. RECOMMENDATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (“EAP”)

<b>2.1.</b>	<b>Provide Impact management outcomes (based on the assessment and where applicable, specialist assessments) for the proposed activity or development for inclusion in the EMPr</b>
<p>The impact management outcomes included in the EMPr include:</p> <ul style="list-style-type: none"> <li>• Effective management and monitoring of the EMPr and EA requirements.</li> <li>• Compliance with legislative requirements.</li> <li>• Limiting of groundwater impacts and off-site / on-site vapour inhalation.</li> <li>• Determination of baseline groundwater data.</li> <li>• Damage to the environment is avoided / minimised.</li> <li>• Clean and well-maintained ablution facilities provided in suitable locations.</li> <li>• Effective housekeeping.</li> <li>• Safe supply of drinking water.</li> <li>• Prevention of community conflict and unsupervised activities.</li> <li>• Maximisation of local B-BBEE employment.</li> <li>• Minimisation / avoidance of disturbance to road traffic and surrounding community.</li> <li>• Prevention of access to No-Go areas.</li> <li>• Minimal loss of topsoil.</li> <li>• Effective management of subsoil.</li> <li>• Safe passage of goods between destinations.</li> <li>• Effective containment, handling, storage and disposal of hazardous substances.</li> <li>• Spillages of hazardous substances from equipment is prevented.</li> <li>• Spillages during refuelling is avoided.</li> <li>• Contamination of the environmental as a result of maintenance activities, accidental leaks, waste / wastewater management, concrete batching is prevented.</li> <li>• Soil loss and sedimentation of water resources are prevented.</li> <li>• Safe traffic management.</li> <li>• Effective fire control and prevention.</li> <li>• Minimisation of noise disturbance to neighbouring properties.</li> <li>• Minimisation of dust.</li> <li>• Minimisation / prevention of impacts on cultural heritage resources.</li> <li>• Successful restoration of disturbed areas.</li> <li>• Compliance with local CCT signage By-laws.</li> <li>• Maintenance of landscaping.</li> <li>• Compliance with legislative requirements.</li> <li>• No damage to the environment with respect to the construction camp location and layout.</li> <li>• No chemical spills from ablutions.</li> <li>• No litter on site.</li> <li>• No wastage of water and unauthorised use of water resources.</li> <li>• No environmental destruction.</li> <li>• No negative impact on the aesthetics of the area.</li> <li>• No disturbance to road traffic and surrounding community</li> <li>• No damage to topsoil and subsoil.</li> <li>• Safe passage of goods between destinations.</li> <li>• Shortest transportation time and no damage to sensitive environments.</li> <li>• No hazardous fuels spills, effective containment in the event of a spill.</li> <li>• No contamination of surface and groundwater resources.</li> <li>• No damage and disturbance to watercourse.</li> <li>• No traffic incidents.</li> <li>• No damage arising from fires.</li> <li>• No noise disturbance to neighbouring properties.</li> <li>• No dust nuisance.</li> <li>• No damage to water resources.</li> <li>• Restoration of damaged environments.</li> <li>• Alien vegetation removal and management.</li> <li>• Benefits and opportunities to local communities.</li> </ul>	

<b>2.2.</b>	<b>Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation.</b>
None identified.	
<b>2.3.</b>	<b>Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.</b>
<p>The planning phase of the proposed project has included input of various members of the project team in order to ensure that it would not result in unacceptable negative impacts on the biophysical and socio-economic environment. The project layout has been updated as the previously proposed access to and from Upper Southern Precinct boulevard was not considered to be viable as trucks would not be able to manoeuvre in and out of the fuel station. Moreover, this design / layout would not have allowed for a sufficient vehicular stacking distance onto Plattekloof and would have been in conflict with the CCT's requirements. Various mitigation measures have been proposed to limit the identified potential impacts of the project. As a result, the majority of the impacts are expected to be of <b>VERY LOW to LOW</b> significance after mitigation.</p> <p>Taking the above into consideration, together with the support for infill development outlined in the spatial planning documentation for the area (refer to Section D above), it is deemed that the proposed project should be authorised.</p>	
<b>2.4.</b>	<b>Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.</b>
<p>SLR assumes that there would be no significant change to the project description or change in the nature of the receiving environment, which would require a re-assessment of the potential impacts as assessed in this report. SLR also assumes that all the data and information provided by the applicant and project consulting engineer were accurate and unbiased.</p>	
<b>2.5.</b>	<b>The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.</b>
Ten years for the completion of the project development phase.	

### 3. WATER

<p><b>Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.</b></p>
<p>Only a minimal volume of water may be required for dust suppression measures, concrete batching and drinking water during the construction phase. Areas would only be wetted using non-potable water during windy days and / or when dust may become a nuisance to surrounding residents and businesses. All water tanks and water trucks would be maintained in a good working condition to ensure that no unnecessary water leaks occur.</p> <p>During operation, the following water saving measures are recommended:</p> <ul style="list-style-type: none"> <li>• Rainwater tanks are to be installed on the property.</li> <li>• A dual rain / main water system is to be implemented.</li> <li>• Urinals are to be waterless.</li> <li>• A dual flush system is to be implemented for the ablutions.</li> <li>• Low flow taps are to be installed.</li> </ul>

### 4. WASTE

<p><b>Explain what measures have been taken to reduce, reuse or recycle waste.</b></p>
<p>The Contractor and Operator would be responsible for the establishment of a solid waste control and removal system in order to prevent the spread of waste in during the construction and operational phases, respectively. The following measures have been included in the EMPr (see Appendix H):</p> <ul style="list-style-type: none"> <li>• An integrated waste management approach would be used, based on the principles of waste minimisation, reduction, reuse and recycling of materials. Containers for glass, paper, metals and plastics would be provided. All non-recyclable solid waste would be disposed of off-site at a licenced landfill site.</li> <li>• All hydrocarbons (e.g. fuel, oils and contaminated soil / materials) and other hazardous waste resulting from spills, refuelling and maintenance activities would be disposed of at a licenced hazardous waste site or, where possible, sold to an approved used-oil recycling company.</li> </ul>

## 5. ENERGY EFFICIENCY

<b>8.1.</b>	<b>Explain what design measures have been taken to ensure that the development proposal will be energy efficient.</b>
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The following energy saving measures are recommended in order to ensure energy efficiency during the operation phase:

- Install rooftop integrity panels on the convenience store.
- Install low energy light bulbs.
- Implement auto on-off light switches in ablutions and other infrequently used areas, such as bathrooms.

## SECTION K: DECLARATIONS

### DECLARATION OF THE APPLICANT

I, Alexander de Beer, ID number 630523 5032 080, in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”), the Environmental Impact Assessment (“EIA”) Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;
- I appointed the Environmental Assessment Practitioner (“EAP”) (if not exempted from this requirement) which:
  - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
  - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;
- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
  - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
  - Legitimate costs in respect of specialist(s) reviews; and
  - the provision of security to ensure compliance with applicable management and mitigation measures;
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

**Note:** If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.

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Signature of the Applicant:

Date:

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Richmond Park Development Company

Name of company (if applicable):

## DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I, Stuart Heather-Clark, EAPASA Registration number 2019/613 as the appointed EAP hereby declare/affirm the correctness of the:

- Information provided in this BAR and any other documents/reports submitted in support of this BAR;
- The inclusion of comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant; and
- Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties, and that:
- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- In terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this application;
- I have ensured that information containing all relevant facts in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- I have ensured that the comments of all interested and affected parties were considered, recorded, responded to and submitted to the Competent Authority in respect of this application;
- I have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- I have kept a register of all interested and affected parties that participated in the public participation process; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;



17 May 2021

Signature of the EAP:

Date:

SLR Consulting (South Africa) (Pty) Ltd

Name of company (if applicable):

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