

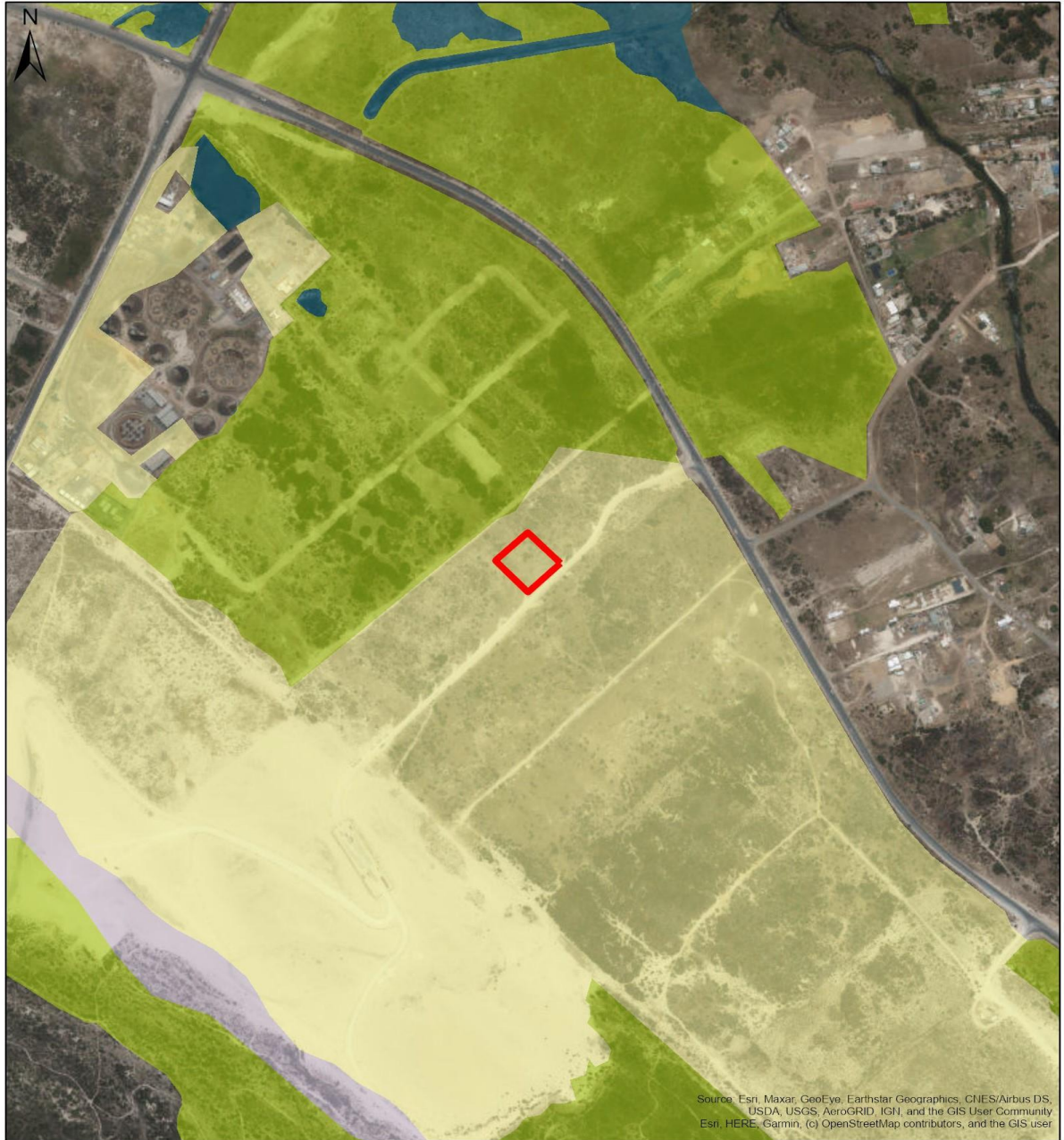
**AFRIMAT MACASSAR READYMIX PLANT: SITE SENSITIVITY ANALYSES OF ERF 4886
MACASSAR REGARDING AN APPLICATION FOR ENVIRONMENTAL AUTHORIZATION
APPLICATION**

1) Background

Afrimat Readymix proposes to erect a mobile batching plant on erf 4886, Macassar for commercial use to service the Khayelitsha, Strand and Somerset West area. A total of 9ha is being needed for the yard, and thus only a portion of the entire erf measuring 90 632.13m² will be utilised for this development. The site is located next to the Zandvliet Waste Water Treatment Works, East of the R310 (Baden Powell Drive) and opposite Sandvlei Smallholdings, situated in the City of Cape Town Municipal area.

The yard will consist of 2x 100ton silos on foundation, one karoo batching plant, two 6X2 mobile containers, a water scale, admix scale, loader ramp and one loader on site. An existing gravel road of approximately 6m wide runs adjacent to the site and will be utilised as an access road, the road currently provides access to the existing sand mine to the south of the proposed development

The site (Erf 4886) identified for the readymix plant is a previously mined property surrounded by currently operating sand mines to the south and east of the site. Furthermore, Cape Farm mapper classifies the site as ESA2: Restore Where Appropriate which is the same classification similar to the east and southern operating sand mine classification (see Figure 1 below).



Legend

BSP ESA

ESA: Terrestrial

BSP ESA: Restore

ESA2: Restore
where appropriate
(CT)

BSP CBA

CBA: Terrestrial
(CT)

CBA: Aquatic (CT)

0 0.1 0.2 0.4 km

Scale: 1:9 028

Date created: August 14, 2020

Compiled with CapeFarmMapper



**Western Cape
Government**

Agriculture

Figure 1: Cape Farm Mapper CBA classification.

2) Screening tool classification of the site

The screening tool report for the application classified the site sensitivity against the environmental elements as follows:

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

Furthermore the Screening Tool Report identifies the following specialist studies needed for the development:



N o	Specialist assessment	Assessment Protocol
1	Agricultural Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/DraftGazetted_Agriculture_Assessment_Protocols.pdf
2	Landscape/Visual Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/DraftGazetted_General_Requirement_Assessment_Protocols.pdf
3	Archaeological and Cultural Heritage Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/DraftGazetted_General_Requirement_Assessment_Protocols.pdf
4	Palaeontology Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/DraftGazetted_General_Requirement_Assessment_Protocols.pdf
5	Terrestrial Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/DraftGazetted_Terrestrial_Biodiversity_Assessment_Protocols.pdf
6	Aquatic Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/DraftGazetted_Aquatic_Biodiversity_Assessment.pdf
7	Hydrology	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols
8	Socio-Economic Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/DraftGazetted_General_Requirement_Assessment_Protocols.pdf
9	Plant Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/DraftGazetted_General_Requirement_Assessment_Protocols.pdf
10	Animal Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/DraftGazetted_General_Requirement_Assessment_Protocols.pdf

3) Site visit by Environmental Specialist to assess site against screening tool reporting and need for specialist site sensitivities of environmental elements at this stage

The EAP together with Afrimat environmental specialist Mr Siphumelelo Mbali, who has been part of management and leader of more than 20 EA applications and Environmental Audit Reports as an EAP, visited the site on Friday 3 September and 6 September 2021 to assess the screening tool assessment in relation to what the site has been used for and what Afrimat intends to use the site for.

The following photos shows the site condition:



Photo 1: Showing erf 4886 in relation to surrounding environment, showing no distinct difference to adjacent mining environment. Photo taken on the Afrimat Olympic sand mine access road.



Photo 2: Showing the current vegetation status of the site. The site has remnant fynbos vegetation, alien port Jackson and partial waste dumping by locals.



Photo 3: showing site condition an access road of the southern mine



Photo 4: Showing existing access road of southern sand mine going to be used by Afrimat readymix plant

4) Discussion in relation to the competent authority response letter dated 28 September 2021

With regards to the comments shared regarding the SSVR, the following are the responses according to the item as per the letter from the Department under 4.2 that deals with screening report and specialist studies identified.

4.2.1. A Landscape/ Visual Impact Assessment;

There is no need to have the landscape and visual assessment on site as the visual impact will be assessed as part of the Impact Assessment and does not require a specialist study.

4.2.2. An Archaeological and Cultural Heritage Impact Assessment;

The heritage assessment study has been conducted and will form part of the final submission of the Basic Assessment Report.

4.2.3. A Palaeontological Impact Assessment;

There is no need for the study to be undertaken unless the heritage specialist study identifies such as a need.

4.2.4. A Terrestrial Biodiversity Assessment

The Biodiversity study will incorporate the terrestrial assessment and will form part of the BA report.

4.2.5. An Aquatic Biodiversity Assessment;

There is no wetland on site and therefore there is no need to undertake the study.

4.2.6. An Avian Impact Assessment;

There is no need for the study on site to be undertaken

4.2.7. A Socio-Economic Assessment

This will form part of the assessment and will be covered as part of the Basic Assessment Report.

4.2.8. A Plant Species Assessment

This will be covered under the Biodiversity study that will form part of the final Report.

4.2.9. An Animal Species Assessment

This item will also be covered as part of the Biodiversity study to form part of the BA Report.

5) Recommendation and conclusions on compliance statements for identified environmental themes at this early stage

While environmental themes reporting in application stage have an important role in decision making, the applicability of having such report/s must be assessed on a site specific and case by case instance. At application stage, when the application area may be under application by other applicants without the subject applicant's knowledge to such application, it is the opinion of the EAP that the site is not high sensitivity especially within consideration of immediate surrounding uses of sand mines and Waste Treatment works.

Nonetheless, the EAP is aware that a precautionary approach is necessary to protect our environments from detrimental environmental impact but the current site is not highly sensitive based on the EAP site visit.

For instance, the screening tool report identifies the identified site as high sensitivity to agriculture and civil aviation, meaning ideally a person would need a specialist comment on such themes but site assessment visit revealed that no agriculture or aviation threats exist for the proposed site with the site surrounded by a formal Khayelitsha settlement, sand mines and has not been farmed in the past 20 years. The separate points raised by the Department have been addressed accordingly in this respect to applicability of certain studies.

Therefore with site specific assessment and experience suggested that this report should be efficient to not need formal assessment or statements apart from the two specialist reports which have also found low sensitivity.