

NOTIFICATION OF PUBLIC PARTICIPATION PROCESS AND AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT FOR PUBLIC REVIEW AND COMMENT AS PART OF THE BASIC ASSESSMENT PROCESS FOR THE PROPOSED PHASE 2 IRT WYNBERG BUS DEPOT AND ASSOCIATED INFRASTRUCTURE ON PORTIONS OF ERF 91191, ERF 90470 AND ERF 90475-RE, WYNBERG, CITY OF CAPE TOWN, WESTERN PROVINCE.

DEA&DP Pre-Application Reference Number: 16/3/3/6/7/1/A6/96/2034/21
DEA&DP Application Reference Number: 16/3/3/1/A6/96/2008/24
DWS Water Use Authorisation Reference Number: 01/G22D/CI/12144

EXECUTIVE SUMMARY

INTRODUCTION

This is the post-application Draft Basic Assessment Report (BAR) (which has all specialist reports appended to it) which is being circulated for a third round of public review and comment for 35 days from 20th of February 2024 to 25 March 2024. The previous 2 versions of this Draft BAR underwent public review for a period of 60 days in 2021 (pre-application draft BAR), and 30 days in 2023 (post application Draft BAR) after which comments received were considered, responded to and changes/updates made to the most recent iteration of the DBAR.

The Pre-application draft BAR underwent public review for a period of sixty days due to One Environment System. During this period, the Department of Water and Sanitation had confirmed that a Water Use License Application (WULA) applied to the proposed development and that Sections 21 (c) and (i) of the NWA were triggered. As such, in line with the NWA, a sixty-day commenting period was provided.

This report has been compiled as part of the integrated Basic Assessment process for the application for Environmental Authorisation in terms of the National Environmental Management Act (No. 107 of 1999), as amended (NEMA) and the associated Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) for a proposed bus depot and associated infrastructure on a portion of Erf 91191, Erf 90470 & Erf 90475-RE, Wynberg. It provides information on the proposed development, Listed Activities triggered (which determines the need for an Environmental Authorisation), the site and various natural, built, cultural, and social environmental considerations, as well as specialist studies undertaken, their findings and recommendations.

Following this public review period, the BAR will again be updated with comments received, finalised, and then submitted to the Competent Authority, the Department of Environmental Affairs & Development Planning (DEA&DP) for decision-making.

PREVIOUS APPLICATION PROCESS

As noted above, this is the third version of the Draft BAR which has previously undergone public review via a pre-application process in 2021 and a withdrawn application process in 2023. The details thereof are noted below:

- The Pre-Application Draft Basic Assessment Report (BAR) for the proposed development was released on 21st July 2021 to 20th September 2021. Proof of Public Participation, I&AP registrations, Stakeholder and Authority engagements, as well as comments and responses have been recorded within this BAR.
- The Post Application Draft BAR and Application for the proposed development was submitted on 2nd May 2023 and public participation ran until 3rd June 2023. Proof of public participation, I&AP registrations, Stakeholder and Authority engagements, as well as comments and responses from the first iteration of the Draft BAR have been recorded within this BAR.
- On 10th of July 2023, a meeting was held with DEA&DP: Development Management and Pollutions and Chemicals, where the applicant, City of Cape Town, via Chand Consultants, were instructed to

withdraw the application for Environmental Authorisation pending further testing and conclusion of the Part 8 Land Contamination from the DEA&DP.

- On the 21st of December 2023, a Remediation Order was issued by DEA&DP under Section 38(3) of the National Environmental Management: Waste Act (Act 59 of 2008) for the contamination of the Wynberg waste dumping site on Erven 90475/RE, 90470 and 91191, Wetton Road, Wynberg (Reference number: 19/3/5/39), thus concluding the Part 8 Land Contamination process.

As such, a new application for Environmental Authorisation and Draft BAR has been submitted to the DEA&DP and released for public review and comment.

PROJECT DESCRIPTION

The City of Cape Town (CCT) intends to develop a network of routes in which public transport bus services can operate (referred to as the Integrated Rapid Transport (IRT) System). As part of its Integrated Rapid Transport (IRT) project, the CCT proposes the construction of a bus depot and associated infrastructure in Wynberg, Cape Town (refer to **Figure i** for location of the study area). Chand Consultants was appointed for the application for Environmental Authorisation required in terms of the NEMA EIA Regulations (2014, as amended) and the Water Use License in terms of the National Water Act.



Figure i. Site Locality Map (Created using Google Earth Pro, February 2024)

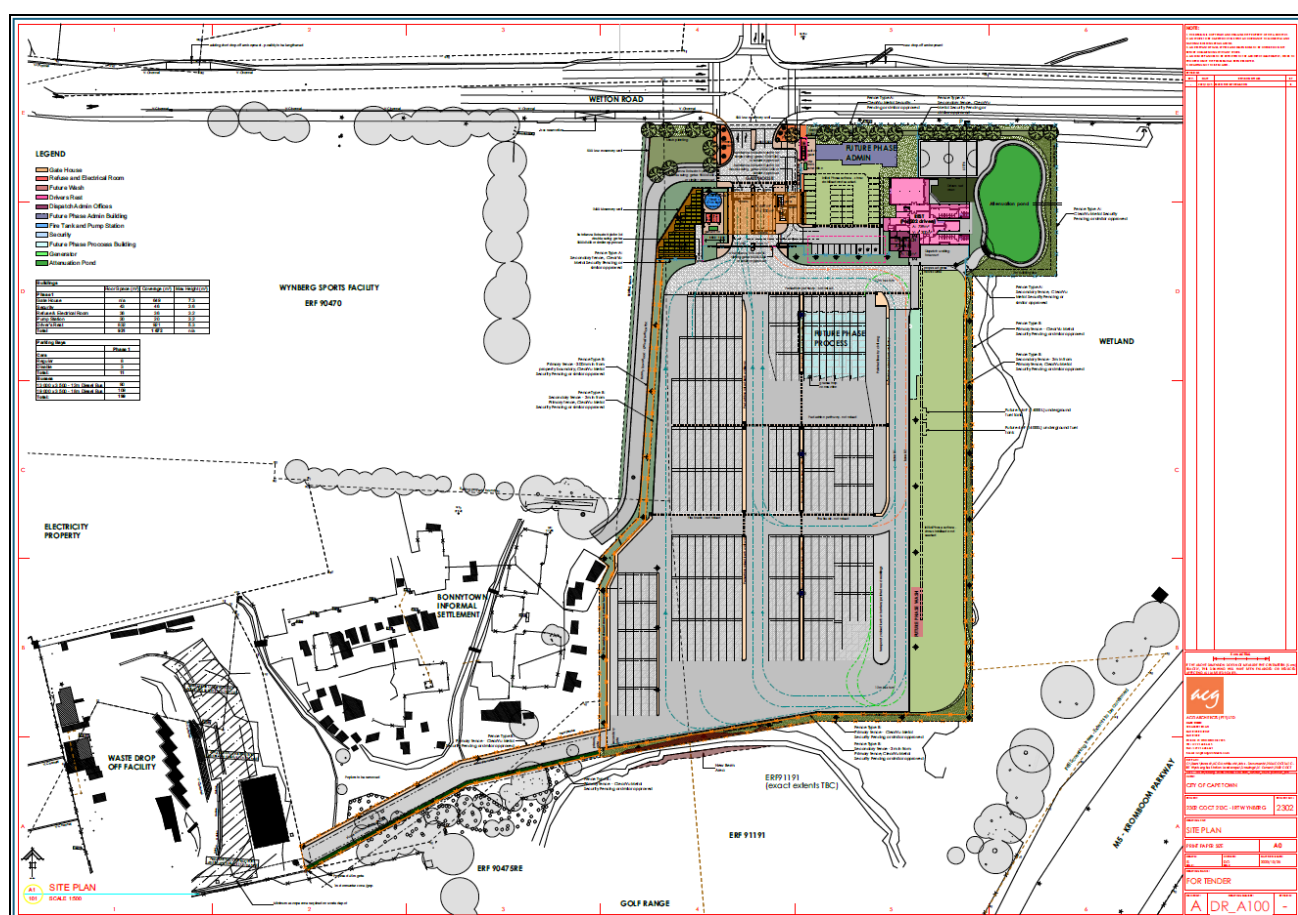


Figure ii. Site Development Plan; Alternative 2 Preferred (Source: ACG Architects, 2024).

The proposed development, shown above in **Figure ii**, is for a bus depot, within the limits of the development footprint Alternative 2, noting that the proposed site plan is depicted below.

The proposed development would comprise a large, paved staging area where buses would be stored overnight (up to about 61 buses in the long-term) or until use, administrative and maintenance buildings/structures, and access routes. The assessment scope includes the realignment and formalisation of the Bonnytown access road. The depot would provide for up to approximately 202 buses (noting that there would be capacity for up to 202-day time staging and for up to 61 overnight staging buses). The detailed design of the proposed depot is yet to be determined and will be included in the Final Basic Assessment Report, however, the final layout and design has been submitted with this report and it is important to note the following basic components will likely apply:

- Re-alignment of the Bonnytown access road to the west of the proposed depot.
- Refueling area (2 x underground diesel storage tank with capacity of 14m³ each) which would include a refueling office and an additional AdBlue Store area (to hold an approximately 280 litre tank- i.e., 1% of fuel storage capacity);
- Wash bay (manual wash only), including support buildings (potentially with automated wash bays as well as deep clean wash bays and all water used in the wash bay would be recycled);
- Parking area (staff and visitors);
- Workshops (where vehicle maintenance and repairs would occur);
- Possible spray booth with the following typical components for a closed system;
 - Spray Booth Structure, manufactured from insulated panels (Rock Wool or EPS);
 - Air Intake Systems;
 - Air Intake Filtration System;
 - Air Extraction Systems;
 - Entrance and Exit Doors at opposing ends of spray booth;
 - Heating Systems which automatically regulate the internal temperature during spray painting mode;
 - Ceiling and Side Wall Lights; and
 - Electrical Control System.
- Admin buildings for drivers and staff (e.g., driver dispatch facility, driver mess and recreational facilities);
- Security buildings at the main entrance;
- Double-fencing around perimeter;
- Landscaped areas around the depot;
- Stormwater drainage and attenuation infrastructure; and
- Emergency Exit Road.

Access would be off Wetton Road and there would be two embayments for drop-off/pick-up purposes. Note that the Wetton Road/ Racecourse Access Road intersection would be upgraded and signalised if it is not already done by the time the development of the proposed development commences.

Stormwater management on site would occur within the limits of the proposed development footprint. The intention is to capture the stormwater generated on site in permeable pavers and run these to a stormwater pond in the north-east corner of the site. The pond would treat the stormwater to acceptable quality standards for discharge into the wetlands to the east of the site.

Connection would be made to existing electrical, water and sanitation services in the area, all of which have been confirmed to have capacity by the City of Cape Town. Refuse removal would be provided by private contractor.

Boreholes would also be located throughout the site for groundwater quality monitoring during the pre-construction and operational phase. These would not be used for water abstraction purposes, and only monitoring.

The depot would also be landscaped with key wetland species around the stormwater pond, and CFSF representative species for the remainder of the site.

LEGAL TRIGGERS:

National Environmental Management Act (No. 107 of 1998), as amended (NEMA)

With respect to the **National Environmental Management Act** (No. 107 of 1998), as amended (NEMA) and associated Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) and associated **Listed Activities**, the following aspects of the proposed development, preferred alternative (i.e., Alternative 2) are important:

- Much of the site is located within a wetland, albeit a degraded wetland. Infilling of this wetland would be required in order to achieve the proposed development.
- The emergency road as well as the relocated Bonnytown access road to the west of the site would be constructed in an area which is confirmed to be an "Other Ecological Support Area" (OESA) as well as Public Open Space and a buffer zone, therefore this listed activity is included given that exact measurements would be confirmed in detail design, noting that they would both be relatively short roads.
- The site is mapped as a critically endangered ecosystem and is located within City of Cape Town's EMF as wetlands and buffer areas. The site is also zoned as Public Open Space. The site has been assessed by a botanist and the assessment indicates that it is highly transformed with limited indigenous vegetation. However, it is likely that 300m² in total (although sporadically spread throughout the site) may need to be cleared.
- The site is zoned Public Open Space and is located within wetland and buffer zones denoted in terms of the City of Cape Town EMF. The proposed development would also be larger than 1000m².

Therefore, Listed Activity 19 of Listing Notice 1 as well as Activities 4, 12, and 15 of Listing Notice 3 would be triggered.

National Water Act (No. 36 of 1998) (NWA)

The Department of Water and Sanitation (DWS) has also confirmed that the proposed development must be authorised under a Water Use License for Section 21 (c) and (l) of the National Water Act (No. 36 of 1998) (NWA). A Water Use License has been issued and can be found under **Appendix E** of the Basic Assessment Report.

National Environmental Management: Waste Act (No. 59 of 2008) (NEM:WA)

The site has also been used as an illegal dumping site for decades, and engagement with DEA&DP: Pollution and Chemicals Management has been initiated in terms of Part 8 of the National Environmental Management: Waste Act (No. 59 of 2008) (NEM:WA) who has identified the site as an Investigation Area. On the 21st of December 2023, a Remediation Order was issued by DEA&DP under Section 38(3) of the National Environmental Management: Waste Act (Act 59 of 2008) for the contamination of the Wynberg waste dumping site on Erven 90475/RE, 90470 and 91191, Wetton Road, Wynberg (Reference number: 19/3/5/39) (refer to **Appendix P8** of the Basic Assessment Report). Within the Remediation Order the Department decided that the investigation area is deemed contaminated, presents an immediate risk, and that measures are required to monitor and manage the risk. Several pre-construction and ongoing monitoring measures to be undertaken manage the risk were conditioned within the Remediation Order. These measures have been included within **Section 12** below of this report and the EMPr.

DEA&DP Waste Management have confirmed that a Waste Management License will not be necessary in this regard. A set of pre-construction, construction and operational tests for groundwater, soil and freshwater quality will be conducted for monitoring and record keeping purposes.

ALTERNATIVES:

Alternatives have been assessed in the form of the preferred development footprint alternative (i.e. Alternative 2), an alternative development footprint (i.e. Alternative 1) and the no-go or no-development alternative. In addition, alternatives within preferred development alternative have also been considered in terms of stormwater management, as well as the best practicable remediation/ ground stabilisation

approach. In terms of the development alternatives assessed, many of the impact would be the same across both (e.g. socio-economic, traffic, freshwater, faunal, botanical, MHI risk, groundwater, heritage and agricultural), but there has been a clear preference from a faunal perspective for the preferred alternative (Alternative 2) and the footprint has been devised in order to avoid the less degraded wetland areas and moderate SEI faunal habitat, and to provide a slightly comparatively wider faunal movement corridor for the Western Leopard Toad (WLT) (noting this is potential as no WLT were identified during the faunal assessment, but it has still been assumed that they use the site for movement and foraging). It is also comparatively narrower in the south-west corner in order to avoid any Bonnytown informal settlement structures. Therefore, Alternative 2 is preferred. The no-go alternative has also been assessed as the *status quo* of the site would continue as is. The no-go alternative is not preferred as it in itself holds negative impacts from an ecological perspective which are largely similar to the proposed development (except for the medium negative faunal impact associated with the reduction in WLT corridor and low to medium negative groundwater impacts) and so the conditions on site do not preclude development of the proposed depot as indicated in the preferred alternative, with implementation of mitigation as these impacts can be mitigated to acceptable levels (noting that the Medium negative faunal impact is acceptable in terms of the SEI for the SCC of the site). There are positive socio-economic impacts that would be foregone, and the provision of the bus services would be hampered.

BASELINE ENVIRONMENT

Geology/Soils/Geotechnical:

Soil is largely described as "slightly clayey sand", the soils classify as SM-SC or SC (Brown & Engelsman, 2020). The published geological map of the area indicates that the site is underlain by recent Quaternary deposits, underlain by clayey decomposed granite and granite at depth below the site (Brown & Engelsman, 2020). The soil profile at the site is characterised by variable fill material overlying naturally transported in situ soils. The layers of refuse in the overlying fill make the founding conditions potentially problematic in terms of settlement/differential settlement and remedial measures will have to be undertaken to reduce the amount of potential settlement/differential settlement (Brown & Engelsman, 2020). The old refuse layer beneath the more recent fill material is the layer which is more prone to settlement, and it will be very difficult to improve the compaction within this layer (due to the depth and the saturated conditions) (Brown & Engelsman, 2020). The refuse layer was found to vary in thickness between about 0.3 m and about 1.2 m, with a probable average thickness in the order of about 0.8 m (although some thicker refuse layers are likely to be present) (Brown & Engelsman, 2020).

Topography:

The proposed Wynberg Depot site has an existing moderate overland slope of 0.60%, draining in a north-easterly direction toward the existing low-lying area adjacent to Kromboom Parkway (M5) (Saunders *et al*, 2021).

Botany:

The site is completely (+99%) covered with exotic grass and invasive alien plants (IAP's), there is almost no indigenous species present (let alone cover) thus no species of conservation concern and being a non-ecologically managed open space within an urban environment there is no natural fire regime (NCC, 2021). The soil and water profiles are also highly transformed and therefore, as highly sensitive factors for the survival CFSF, this renders the site irreversibly modified and completely unsuitable for CFSF to persist (NCC, 2021).

Freshwater:

The impermeable nature of the dumped material seems to have formed wetland conditions across large parts of this raised area (where wetlands would not ordinarily be expected) allowing establishment of wetland obligate¹ vegetation (Steytler & Mugabe, 2021). Whereas the entire study area is highly impacted and transformed, distinction is drawn between more sensitive (less degraded) and less sensitive (degraded) portions on the basis of remnant natural habitat and degree of soil disturbance (i.e., dumped waste and infilling) (Steytler & Mugabe, 2021). These two markedly differing portions of the wetland have been categorised as 'less degraded' and 'degraded' (Steytler & Mugabe, 2021). The development footprint for the

¹ Plants that occur almost always (estimated probability >99%) in wetlands under natural conditions, but which may also occur rarely (estimated probability <1%) in non-wetlands.

preferred alternative for the proposed bus depot has been devised to remain solely within the “less degraded” wetland identified by Steytler & Mugabe (2021). The degraded wetland (which is where the limits of the preferred alternative would be located) provides moderately low WET-Ecosystem services, has a category E PES and low/marginal EIS. The less degraded wetland (which is not within the limits of the preferred alternative development footprint but lies adjacent to the east) provides moderately low WET-Ecosystem services, has a category D PES and moderate EIS.

Faunal:

Both the less degraded and the degraded depression wetlands on site are considered to have a very low SEI at habitat level (Jackson & Martin, 2021). Under this rating, development activities of ‘Medium’ to ‘High’ impact are acceptable but with minimisation and restoration mitigation (Jackson & Martin, 2021). The project area has a High RR and thus a Medium SEI (Jackson & Martin, 2021).

In terms of the value of the site as a corridor, it is worth noting that the intact and important pockets of Cape Flats Sand Fynbos at neighbouring sites at the Kenilworth Racecourse Conservation Area and Youngsfield Military Base are of ecological importance (Jackson & Martin, 2021). These areas may form part of the corridor that provides a refugia for important species and facilitates the movement of species within an urban area (refer to **Error! Reference source not found.**) (Jackson & Martin, 2021). However, **the project area occurs just outside of the formalised biodiversity corridors in the City of Cape Town** (Jackson & Martin, 2021). Notwithstanding the above, the precautionary principle is applied, and it has been found that the WLT may use the site and adjacent area to access non-breeding sites (or for foraging grounds) as individuals have been found north of the project area while the breeding site is south of the project area (Jackson & Martin, 2021). Note also that this is the only terrestrial vertebrate species of conservation concern (SCCC), that may be impacted by the proposed development.

The impact is assessed as moderate (-)/ Medium (-) with mitigation (Jackson & Martin, 2021). This aligns with impacts considered acceptable in terms of the SEI ascribed to this SCC through the faunal impact assessment. It is important to note that the proposed development would only remove a portion of the corridor leaving a width of 65m at its narrowest point in the south and 325m at its widest on Wetton Road (Jackson & Martin, 2021). Disturbance to faunal species during operation is also assessed by the faunal specialist and the impacts are found to be Low (-) with mitigation, noting that the degraded area offers little ecological function, and the less degraded area maintains some functionality albeit very low (Jackson & Martin, 2021). It may function as a corridor but if the portion of degraded wetland were to be lost, this would have little impact on the function of the corridor (Jackson & Martin, 2021).

In terms of impacts on fauna, four faunal groupings were looked at by a faunal specialist; amphibians, reptiles, mammals, and avifauna. Overall, an SEI of Medium is applied to the WLT on site and for this rating, medium impacts for development are acceptable provided that restoration occurs (Jackson & Martin, 2021). ‘Low to Medium’ SEI considers ‘Medium’ impacts acceptable for development activities provided that restoration activities are implemented (Jackson & Martin, 2021).

Although not likely to be found on site, as species of conservation concern, assessments were also completed for the Cape Platanna, Micro Frog, and Black Harrier, all of which were found to have ‘Very Low’ SEI which means that ‘Medium to High’ impacts would be considered acceptable with no need for restoration (Jackson & Martin, 2021).

The project area may be used to access nonbreeding sites or act as a non-breeding site (Jackson & Martin, 2021). **No WLT were found breeding in the inundated wetland areas within the project area** (Jackson & Martin, 2021), noting that the specialist specifically carried out a field survey during the breeding season of 2020.

Agricultural:

There are no agricultural resources on or near the site that would be affected by the proposed development.

Groundwater:

The site is located within the Table Mountain Strategic Water Source Area (SWSA) for surface water and the Cape Peninsula and Cape Flats SWSA for groundwater. The underlying aquifer is classified as an intergranular and fractured with an average yield potential 0.0 – 0.1L/s (Naicker & Muller, 2021). The aquifer vulnerability to

contamination is mapped as being "high". This rating is likely associated with the mapped, flat-lying, unconsolidated alluvial material which is highly susceptible to point and non-point sources contamination (Naicker & Muller, 2021). The average depth to groundwater is confirmed approximately 2.5 mbgl on average across the site (Naicker & Muller, 2021).

Heritage/cultural/archaeological aspects:

There are no heritage resources on or nearby the site that would be affected by the proposed development.

Noise:

No sensitive noise receptors were identified near the site, other than the Bonnytown informal settlement.

MHI Risk:

There are no nearby hazardous installations that would pose a risk to the proposed development.

Traffic/Transport:

Analyses indicates that the Wetton Road / Rosmead Avenue intersection currently operate well, with the exception of the right-turn movement on the southern Rosmead Avenue approach, but constraints at the Wetton Road / Rosmead Avenue intersection preclude any feasible upgrades from being proposed (Clark & Liebenberg, 2021).

Contamination:

Soil samples were analysed for metals and metalloids, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs) and TPH (O'Brien & Engelsman, 2020). The concentrations of all determinants in the recent fill disposed of at the site (i.e., upper surface layer) are all below their respective soil screening values for commercial industrial land use (proposed future use) (O'Brien & Engelsman, 2020).

O'Brien & Engelsman (2020) confirm that no complete S-P-R linkage is identified for site workers (construction or operational phase) due to the absence of any contamination sources in the surface fill layer at the site, but that a potentially complete S-P-R linkage exists via the leaching of Cu and Pb from the surface fill to groundwater and ecological receptors. However, in this regard, the covering of the recent fill with hardstanding materials and resultant reduction in infiltration is considered sufficient to mitigate these risks (O'Brien & Engelsman, 2020). The upper fill layer is not considered to be contaminated and does not pose an unacceptable risk to human health in an industrial / commercial land use (O'Brien & Engelsman, 2020).

SUMMARY OF IMPACTS

In terms of impacts on the natural environment, there would be a combination of positive and negative impacts from a freshwater, botanical and faunal perspective. Most negative impacts in this regard are anticipated to be low or very low, with the exception of the faunal aspect in terms of a reduced corridor for the WLT, which is ranked as Medium (-), noting that this is acceptable in terms of the confirmed SEI of the site (as assessed by Jackson & Martin, 2021). Positive impacts in this regard are limited to two impacts, namely a single Medium (+) freshwater impact for potential improvements in water quality and a low (+) botanical impact regarding a reduction in pollution leachate.

Overall, Construction phase impacts would mostly be short-term, with the exception of the transformation of the site (which involved clearing vegetation, wetland habitat, faunal habitat, and removal of some faunal movement corridor) which would hold permanent impacts. Construction phase impacts for changes to the surface drainage regime would be neutral. The positive impacts during this phase largely relate to the socio-economic impact of job creation and site safety and security (which are both rated as medium (+), Very low (-) impacts are anticipated to be associated with typical construction-related aspects such as noise, dust, visual (aesthetics), and use of natural resources. Traffic impacts would also be low (-). Similarly, freshwater impacts are anticipated to be low (-) or very low (-) during construction, with the exception of a single Medium (+) impact for potential improvements in water quality. There would be no botanical impact, given the transformed nature of the site and faunal and groundwater impacts would be low (-), with the exception of the faunal aspect in terms of a reduced corridor for the WLT, which is ranked as medium (-), noting that this acceptable in terms of the confirmed SEI of the site (as assessed by Jackson & Martin, 2021).

No impacts are anticipated with regard to heritage, noise and agricultural production.

Operational impacts are anticipated to be Medium (+) in terms socio-economic aspects such as employment opportunity and improved accessibility with high (+) impacts to improvements in safety and security of the site. There are also positive potential impacts associated with the reduction in greenhouse gas emissions. There would also be one low (+) botanical impact regarding a reduction in pollution leachate. Traffic impacts are anticipated to be low (-) with limited difference in current congestion experienced. Negative impacts are also anticipated as a result of the proposed development. There would be low (-) impacts associated with resource use and the impacts associated with freshwater and faunal aspects would be low (-) or very low (-) with no negative. Impacts on groundwater are anticipated to be low (-) to medium (-) (with the specialist confirming that these can be mitigated to acceptable levels) and MHI risk is very low (-).

Two key adverse environmental impacts have emerged through this assessment, which the impact would be medium (-) and low to medium (-) and these are the impact of the loss of the faunal corridor on the WLT and the potential for contamination of groundwater. However, these impacts are acceptable in terms of the SCC SEI for the WLT as assessed by Jackson & Martin (2021) and confirmed that they can be mitigated to acceptable levels (Naicker & Muller, 2021) respectively. Furthermore, specialist assessment has confirmed that the proposed development would not impact on nearby sensitive areas, namely the Kenilworth Conservation Area and the Youngsfield Military Base.

PLANNING, DESIGN AND CONSTRUCTION PHASE IMPACTS:						
ALTERNATIVES	Alternative 1		Alternative 2 (Preferred)		No Go Alternative	
Impact:	Significance before mitigation:	Significance after mitigation:	Significance before mitigation:	Significance after mitigation:	Significance before mitigation:	Significance after mitigation:
ALTERING THE SURFACE DRAINAGE REGIME: The cut and fill activities and other earthworks that would be required to support development on the site would result in changes to the surface water flow pattern.	Medium (-)	Neutral	Medium (-)	Neutral	None	Not Applicable
SOCIO-ECONOMIC ASPECTS - ECONOMIC STIMULUS: Generation of local economic stimulus	Medium (+)	Medium (+)	Medium (+)	Medium (+)	Neutral and foregone positive impacts of alternative	Not applicable
SOCIO-ECONOMIC ASPECTS - SAFETY AND SECURITY: Generation of continuous activities and presence on the site which would reduce the likelihood of illegal occupation of the site as well as the use of the site for illegal activities and suspicious behaviour.	Medium (+)	Medium (+)	Medium (+)	Medium (+)	Medium (-) and foregone positive impacts of alternative	Not applicable
NUISANCE IMPACTS DUST AND NOISE: The land clearing and other construction activities will result in the generation of dust and noise which may be a nuisance to surrounding land users whilst construction is ongoing.	Low (-)	Very Low (-)	Low (-)	Very Low (-)	Zero	Not applicable
VISUAL ASPECTS: Visual impacts associated with construction activities (machinery, vehicle movement, site camp, signage, lighting and temporary services, wind-blown litter, erosion, and exposed surfaces)	Low (-)	Very Low (-)	Low (-)	Very Low (-)	Zero	Not applicable as there would be no impacts to mitigate.
USE OF NATURAL RESOURCES: Construction of the proposed development and the associated use of natural resources, such as water, resources for the generation of energy, construction materials etc.	Low (-)	Very low (-)	Low (-)	Very low (-)	Zero	Not applicable as there would be no impacts to mitigate.
TRAFFIC: Disturbance to local traffic conditions and safety for road users as a result of construction	Medium (-)	Low (-)	Medium (-)	Low (-)	None	Not Applicable

vehicles accessing the sites during the construction activities.						
HERITAGE ASPECTS: Destruction of significant heritage resources	Low	None	Low	None	None	Not Applicable
FRESHWATER ASPECTS: Loss of wetland habitat and function	Medium (-)	Low (-)	Medium (-)	Low (-)	None	Not Applicable
FRESHWATER ASPECTS: Disturbance of remaining wetland habitat	Low (-)	Very Low (-)	Low (-)	Very Low (-)	None	Not Applicable
FRESHWATER ASPECTS: Alteration of the natural flow regime	Low (-)	Very low (-)	Low (-)	Very low (-)	None	Not Applicable
FRESHWATER ASPECTS: Increased erosion and sedimentation	Low (-)	Very Low (-)	Low (-)	Very Low (-)	None	Not Applicable
FRESHWATER ASPECTS: Water quality impairment	Medium (-)	Very Low (-)	Medium (-)	Very Low (-)	None	Not Applicable
FRESHWATER ASPECTS: Loss of biota	Medium (-)	Very Low (-)	Medium (-)	Very Low (-)	None	Not Applicable
FRESHWATER ASPECTS: Improvement in water quality	Low (+)	Medium (+)	Low (+)	Medium (+)	None	Not Applicable
BOTANICAL ASPECTS: Potential loss of critically endangered CFSF 'vegetation type' (including stormwater pond area) for the IRT Wynberg bus depot (partial loss for preferred alternative- approx 48327m ²)	None/ no impact	No impact	None/ no impact	No impact	Low (-)	Low (-)
FAUNAL ASPECTS: Loss of extent of degraded depression wetland fauna habitat	Low (-)	Low (+)	Low (-)	Low (-)		
FAUNAL ASPECTS: Loss of extent of less degraded depression wetland fauna habitat	Low (-)	Low (-)	NA	NA	Not applicable	None
FAUNAL ASPECTS: Reduced <i>S. Pantherina</i> foraging ground/corridor	High (-)	Moderate/ Medium (-)	High (-)	Moderate/ Medium (-)	Not applicable	None
GROUNDWATER ASPECTS: Contamination as a result from dewatering machinery and activities	Low to Medium (-)	Low (-)	Low to Medium (-)	Low (-)		

OPERATIONAL PHASE IMPACTS:						
ALTERNATIVES	Alternative 1		Alternative 2 (Preferred)		No Go Alternative	
Impact:	Significance before mitigation:	Significance after mitigation:	Significance before mitigation:	Significance after mitigation:	Significance before mitigation:	Significance after mitigation:
SOCIO-ECONOMIC ASPECTS - Creation of employment opportunities as a result of the operation of development. Additional indirect	Medium (+)	Medium (+)	Medium (+)	Medium (+)	Neutral and foregone positive	Not applicable

economic impacts (stimulus) will also be experienced.					impacts of alternative	
SOCIO-ECONOMIC ASPECTS: Provision of improved accessibility for previously disadvantaged communities with respect to employment, economic centres and places of education and recreation.	Medium (+)	Medium (+)	Medium (+)	Medium (+)	Zero and positive impacts would be foregone.	None
SOCIO-ECONOMIC ASPECTS: Improvements to safety and security for all those accessing the area via vehicles or on foot.	High (+)	High (+)	High (+)	High (+)	Zero and positive impacts would be foregone.	None
POTENTIAL IMPACTS ASSOCIATED WITH REDUCTION IN EMISSION OF GREENHOUSE GASES: Operation of the proposed bus depot would result in an increasing number of people making use of public transport over private transport. This would reduce the per capita emission of greenhouse gases in the community.	Medium (+)	Not applicable	Medium (+)	Not applicable	Zero and positive impacts would be foregone.	Not applicable
NUISANCE IMPACTS- NOISE: Impact of noise on nearest noise sensitive receptors (i.e., the Bonny town informal settlement)	Negligible	Not Applicable	Negligible	Not Applicable	Not applicable	Not Applicable
RESOURCE-USE ASPECT: Depletion of resources through use of resources such as energy and water and production of waste as a result of operational activities at the proposed bus depot	Low (-)	Low (-)	Low (-)	Low (-)	Not Applicable	Not Applicable
TRAFFIC ASPECT:	Low (-)	Low (-)	Low (-)	Low (-)	Negligible	Not Applicable
HERITAGE ASPECTS: Impacts to significant heritage resources	Low (-)	None	Low (-)	None	None	Not Applicable
FRESHWATER ASPECTS: Disturbance of wetland habitat	Low (-)	Very Low (-)	Low (-)	Very Low (-)	Medium (-)	Medium (-)
FRESHWATER ASPECTS: Alteration of flow regime	Low (-)	Very low (-)	Low (-)	Very low (-)	Medium (-)	Medium (-)
FRESHWATER ASPECTS: Loss of biota	Medium (-)	Low (-)	Medium (-)	Low (-)	Medium (-)	Medium (-)
BOTANICAL ASPECTS: Destruction of (clearing) irreversibly degraded former CFSF site for the IRT Wynberg bus depot. Impact on broader area (corridor/patch effect), noting that the preferred alternative is partial destruction.	No impact	No impact	No impact	No impact	Not applicable	Not applicable
BOTANICAL ASPECTS: Botanical impact associated with the change in local hydrology effecting nearby	Low (-)	No impact	Low (-)	No impact	Not applicable	Not applicable

indirect and critical CFSF areas through surface hardening						
BOTANICAL ASPECTS: Botanical impact on areas of CFSF resulting from spillage and pollution runoff	No impact	No impact	No impact	No impact	Not applicable	Not applicable
BOTANICAL ASPECTS: Botanical impacts resulting from a reduction in polluted leachate emanating from the site	Low (+)	Not applicable	Low (+)	Not applicable	Medium to high (-)	Low (-)
FAUNAL ASPECTS: Disturbance of faunal species due to operation of the IRT depot.	Low (-)	Low (-)	Low (-)	Low (-)	Not Applicable	Not Applicable
FAUNAL ASPECTS: No-go alternative and provision of ecological function and a corridor to fauna	Not applicable	Not applicable	Not applicable	Not applicable	Low (-)	Not applicable
GROUNDWATER ASPECT: Fuel dispensing operations and the refilling of underground storage tanks	High (-)	Medium – Low (-)	High (-)	Medium – Low (-)	None	None
GROUNDWATER ASPECT: Drainage of onsite chemicals off the depot surface and into the primary aquifer via stormwater	High (-)	Low to Medium (-)	High (-)	Low to Medium (-)	None	None
GROUNDWATER ASPECT: Groundwater contamination from leakage associated with the spray booth and workshops	High (-)	Low to Medium (-)	High (-)	Low to Medium (-)	None	None
GROUNDWATER ASPECT: Groundwater contamination from drainage of contaminants from buses such as oil during washing, into shallow subsurface- long term risk	High (-)	Low to Medium (-)	High (-)	Low to Medium (-)	None	None
GROUNDWATER ASPECT: Groundwater contamination from drainage of contaminants from the bus parking area, into the shallow subsurface	High (-)	Low to Medium (-)	High (-)	Low to Medium (-)	None	None
GROUNDWATER ASPECT: Reduced groundwater recharge into the aquifer due to developed surface	Medium (-)	Low to Medium (-)	Medium (-)	Low to Medium (-)	None	None
MHI RISK ASPECT: Risk of pool fires on site (at refuelling area) (i.e., through diesel tank failure, loading hose rupture of diesel road tanker, loading hose leak at diesel road tanker, tank failure of diesel road tanker, hose rupture at curb-side pump)	Low (-)	Very Low (-)	Low (-)	Very Low (-)	None	None

It is not the intention of the Applicant to decommission the proposed development as it would provide a permanent supporting facility within the greater IRT system.

MITIGATION AND RESPONSE

Heritage

None of the design alternatives under consideration would fall within any areas of heritage sensitivity (Lavin, March 2021) and so there are no further constraints to that must be considered in that regard. The same applies to agricultural areas (Lanz, 2021). There are no mitigation measures or further findings that require consideration in this regard.

Noise

In terms of noise, the nature and scale of the proposed development is already such that impacts would be negligible and therefore no future mitigation is necessary. Traffic/transport impacts are also considered to be low and there are no infrastructure upgrades for the local road network recommended in the Transport impact assessment. The assessment does, however, confirm that the proposed design is appropriate.

Terrestrial and Aquatic Biodiversity

Specialist assessment in terms of terrestrial and aquatic biodiversity, as well as fauna, align on finding that the site is heavily transformed, but that it may provide some function as a movement or foraging corridor for the WLT. Specifically in terms of the impacts on the WLT, the movement through the area would be accommodated through design such as including a stormwater pond, planted to mimic wetland conditions, located in the northeast corner of the site (nearest to the remaining corridor). The WLT Design Guideline measures have also been included in the design specifications of the EMPr. Aside from this, the site plays no other supporting or buffering functions to the nearby Kenilworth Racecourse Conservation area or Youngsfield military base (NCC, 2021). Alternative 2 would not encroach into the less degraded wetland areas and would also not encroach into the moderate SEI faunal habitat. The entire site is also located in a very transformed botanical area and so there would be no impact on CFSF in that regard, given that there is none present on site (NCC, 2021). The intention to remove some of the waste and "cap" it (through development of the depot layer works) would provide positive freshwater and botanical impacts and would also be sufficient from contamination perspective, given that it would close off/block the S-P-R linkages.

Groundwater

The contamination assessment does, however, confirm that the proposed end-use (i.e., a depot) is aligned with the SSV 2 limits and so the levels of certain contaminants detected on site do not legally preclude development of the proposed depot thereon.

The groundwater, botanical and contamination assessments align, and all reports align and address the contaminants found on site and potential for future contamination. There are several mitigation measures included in the design specifications of the EMPr (as per the groundwater and contamination assessment recommendations) in order to mitigate potential groundwater impacts/ water quality impacts to acceptable levels, and they are supported by the botanical impact assessment findings as well.

Stormwater

The stormwater management plan and landscaping proposed take cognisance of the findings of the freshwater impact assessment and the system has been designed to manage water quality and quantity on site, and to recharge the wetlands to the east with clean (i.e., treated/polished) run-off at appropriate volumes/flow rates. Planting of the lined stormwater pond would mimic wetland conditions, with a different strategy applied to the wet zones and drier zones of the pond so that plants do not perish. Planting for the remainder of the area would make use of CFSF plants in response to the botanical findings, as well as some trees, to maintain some of the current landscape character (i.e., there are a few large exotic trees on site).

Monitoring for groundwater, both in terms of recharge trends as well as early detection for contaminants is also included in the proposed development scope and the operational specifications of the EMPr.

Furthermore, given that there are several impacts associated with the construction phase, the EMPr contains many specifications in order to control, manage and mitigate these impacts as recommended by all specialists where construction phase impacts were identified.

Geotechnical

The geotechnical findings are supported through the proposed development and the proposed ground stabilisation/remedial measures would be implemented, noting that this has been confirmed as adequate in the contamination assessment.

Major Hazardous Installation

The potential impacts in terms of MHI risk are acceptable and the risks would not be present off-site, however there are several mitigation measures included in the design specifications of the EMPr to manage these risks (largely related to pool fires). The measures provided in Thackwray (2021) would also, to some degree, provide for protection against possible groundwater contamination in terms of leak prevention and maintenance.

The proposed landscaping design would be incorporated into the stormwater management system where needed and would also make use of appropriate plant species as recommended by the botanist and freshwater ecologist. It also provides for screening from the M5, Wetton Road and Bonnytown.

Management measures for design, planning, construction, and operation phase of the proposed development have also been integrated into the specifications contained in the EMPr, which would also be conditions of Environmental Authorisation (if granted).

Anticipated impacts of the two development footprint alternatives are similar for most aspects, however there is a clear preference for the preferred alternative (i.e., Alternative 2) from a freshwater and faunal perspective. The preferred alternative is intentionally comparatively smaller/narrower along the eastern edge in order to remain out of the less degraded wetland and the moderate SEI faunal habitat area, and to thus provide a comparatively wider WKT movement corridor off-site to the east. Furthermore, the south-west corner is narrower in the preferred alternative in order to remain beyond any structures associated with the Bonnytown informal settlement. Hence, the proposed preferred alternative in this application for environmental authorisation.

NEED AND DESIRABILITY

Overall, all development must, in terms of Section 24 of the Constitution, be ecologically sustainable, and economic and social development must be justifiable. The freshwater impact assessment, faunal impact assessment and botanical impact assessment have considered the sustainability of the ecological aspects on site and nearby (particularly because there are sensitive conservations areas nearby) and impacts have been found to be low (-) or Very Low (-), with mitigation and so the proposed expansion can occur sustainably from an environmental perspective. There are two exceptions with the faunal impact on the WLT movement corridor being medium (-), with mitigation, but this impact is considered acceptable in terms of the SCC SEI (Jackson & Martin, 2021). The other exception is that of potential impacts on groundwater (i.e., contamination of groundwater) which are ranked as medium to Low (-), but Naicker & Muller (2021) confirm that these can be adequately mitigated. The mitigation measures are important and must be implemented. That is why they are included as specifications in the EMPr and are strongly recommended as conditions of authorisation in this Basic Assessment Report.

The economic and social aspects of the project are expected to be medium to high positive and would serve to provide connectivity, opportunity, and economic stimulus, as well as improvements to safety and security of site to surrounding communities (including previously disadvantaged communities), which are believed to be justifiable in the context of historic prejudice, intergenerational sustainability, and equity. Financial sustainability would be provided by the City of Cape Town through their various contracts for operations. In addition, the unconstitutional actions of a previous regime as well as historically poor/unjust spatial planning that did not cater for provision of public transport for all, would be rectified while ensuring that society as a whole can still benefit from the improved connectivity and access provided by the proposed development for generations to come. Noting also that no unacceptable loss (within the context of the ecological function and value of the site) of sensitive natural systems or areas would be experienced by the proposed development, which would result in some loss of completely transformed vegetation and highly degraded wetland/ habitat, but that this would be compensated for through design and management mitigation measures, particularly where movement of fauna (including the WLT), and groundwater contamination prevention are concerned. The sensitive natural assets nearby, namely the Kenilworth Racecourse Conservation Area/ Reserve and the Youngsfield Conservation Area would not be adversely affected by the proposed development.

PUBLIC PARTICIPATION

The public participation process (PPP) to-date has far exceeded the minimum legislative requirements prescribed in regulation 41 of the EIA Regulations, 2014 (as amended).

Pre-Application:

The pre-application PPP included the following activities (noting that while no alternative sites were considered in this impact assessment process, alternative layouts were assessed):

- Compilation of a preliminary Interested and Affected Party (I&AP) database which is informed by research conducted by Chand on contemporary officials and stakeholder groups which may have an interest in the area or project. The I&AP database has been maintained throughout the Basic Assessment process as meetings with key stakeholders have been held. Therefore, the I&AP database includes parties required in terms of Regulation 41 (2) (b) of the EIA Regulations, 2014 (as amended).
- Compilation of a Background Information Document (BID) and distribution of the associated Notification Letter on **30 April 2021 for a 30-day comment period from 1 May 2021 to 1 June 2021**. The notification of the BID was distributed via email to those I&APs with

email addresses and via post to those who did not. The BID was available for download from Chand's website and delivered to surrounding owners via a knock-and-drop exercise.

- The BID was also distributed to the Bonnytoun informal settlement, however, an additional Frequently Asked Questions (FAQ) document was compiled specifically for the residents of the informal settlement pertaining to issues that would be more likely to directly affect them. This FAQ document was provided in English, Afrikaans and isiXhosa.
- A combined pre-application meeting was held with the Department of Water and Sanitation (DWS), DEA&DP: Development Management and DEA&DP: Pollution and Chemicals Management was held on 17 March 2021; and
- A Focus Group Meeting with City of Cape Town: Transport Management, City of Cape Town: Informal Settlements and City of Cape Town: Planning and Development on 27 May 2021

The PPP undertaken for the public review of the pre-application Draft BAR included the following:

- A **60-day** public comment period for the pre-application Draft BAR was provided from **20th July 2021 to 21st September 2021**.
- Knock and Drop delivery of a notification of the availability of the pre-application draft BAR to adjacent landowners;
- Notification of the availability of the pre-application draft BAR was emailed to the preliminary I&AP database and post was sent to those who do not have email addresses.
- The pre-application draft BAR was made available for download from Chand's website for the duration of the comment period.
- A separate executive summary of the pre-application draft BAR was made available for download from Chand's website for the duration of the comment period.
- Attempts were made to leave a hardcopy of the pre-application draft BAR at the Wynberg Public Library, however the library was closed due to the Covid-19 lockdown levels at the time.
- No hardcopies of the pre-application Basic Assessment Report were issued to I&APs, as no requests were received.

Evidence for the above has been included in **Appendix F** of the Basic Assessment Report, noting that contact information for I&APs have not been made public. However, as a registered I&AP, the registrations made are also in terms of the Protection of Personal Information Act and this information will be released to the Applicant, DEA&DP, as well as any appellants at the end of the process, and this information will become part of the public record.

An application for Environmental Authorisation and post application Draft BAR was submitted on 2nd May 2023 and public participation ran until 3rd June 2023. Proof of public participation, I&AP registrations, Stakeholder and Authority engagements, as well as comments and responses from the first iteration of the Draft BAR have been recorded within this BAR.

On 10th July 2023, a meeting was held with DEA&DP: Development Management and Pollutions and Chemicals, where the applicant, City of Cape Town, via Chand Environmental, were requested to withdraw the application for Environmental Authorisation pending further testing required regarding the Part 8 Land Contamination from the DEA&DP. Testing required included soil, groundwater and freshwater sampling and analysis. These results and findings can be found under **Appendix P** of the Basic Assessment Report. As a result of this the application for Environmental Authorisation was withdrawn on the 8th of August 2023 and correspondence and acknowledgment received on the 14th of August 2023. On the 21st of December 2023, a Remediation Order was issued by DEA&DP under Section 38(3) of the National Environmental Management: Waste Act (Act 59 of 2008) for the contamination of the Wynberg waste dumping

site on Erven 90475/RE, 90470 and 91191, Wetton Road, Wynberg (Reference number: 19/3/5/39), thus concluding the Part 8 Land Contamination process.

As such, a new application for Environmental Authorisation has since been submitted, and public review of the post-application Draft BAR is currently underway. PPP activities during this phase include the following:

- A public comment period of a minimum 30 days for the post-application Draft BAR will be from 21st of February 2024 to 22nd of March 2024.
- Placement of two notice boards on the site where the proposed activities are to be undertaken on the site boundary. One board will be placed facing Wetton Road (noting that contents and size would adhere to requirements of Regulations 41 (3) and (4) of the EIA Regulations, 2014 (as amended)). Notice boards will remain erected throughout the public review period.
- Knock and Drop delivery of a notification of the availability of the post-application draft BAR to adjacent landowners will occur on the 20th of February 2024.
- Notification of the availability of the pre-application draft BAR to the registered I&AP database and post to those who do not have email addresses will occur on the 20th of February 2024.
- The pre-application draft BAR has been made available for download from the EAP's website for the duration of the comment period from the 21st of February 2024.
- A separate executive summary of the post-application draft BAR has been made available for download from the EAP's website for the duration of the comment period.
- A hardcopy of Executive Summaries of the post-application draft BAR has been left at the Wynberg Public Library and the local Subcouncil offices, including comment sheets and a comment box for the duration of the public review period.
- Where possible, notices of the project and availability of information for review have been put up at key public places in the community such as libraries and shops. These notices would encourage I&APs to visit the Wynberg Public Library and Local Subcouncil office to collect an executive summary and deposit a comment in the comment box for the duration of the public review period.
- Compilation and placement of one advertisement (in English) in a local newspaper on the 20th of February 2024 (noting that contents would adhere to requirements of Regulation 41 (3) of the EIA Regulations, 2014 (as amended)).

Once the DEA&DP has reviewed the FBAR and issued their decision, the decision, date, reasons for decision, means to access the decision, and an explanation regarding the way the decision may be appealed, as well as any further requirements stipulated therein would be distributed to the registered I&AP database via email for those who have email addresses and post for those who have only postal addresses. It would also be uploaded onto the EAP's website so it would be accessible for download. The applicable appeal period would be explained in accordance with that included in the decision.

Issues have been raised by various state departments, both prior to this process, as well as provided as part of the Basic Assessment process. These issues have been largely procedural or related to pointing out potential aspects for further consideration (such as the Western Leopard Toad possibly making use of the site, the wetlands on site, potential traffic issues, etc).

The issues raised have been addressed in this Basic Assessment Report through a number of ways such as providing a preferred development alternative footprint that avoids certain sensitivities, specialist assessments carried out, details included in the scope of specialist assessments, measures for control in the environmental specifications have been included in the EMPr, and certain points of clarity have been included in the Basic Assessment Report.

CONCLUSIONS

Through Chand's investigation, which entailed inputs from the design team, the environmental specialists and key I&APs (i.e., State Departments), a number of environmental impacts have been identified and considered.

Those aspects that influenced the EAP's opinion on this question are primarily related to the following points:

- The various considerations which were applied to the selection of the site in terms of technical, legal, and contextual considerations prior to initiation of this Basic Assessment process as well as the environmental and biophysical sensitivities (and avoidance thereof) associated with both development footprint alternatives, noting that the preferred alternative (Alternative 2) deliberately avoids the more sensitive areas;
- The need and desirability of the proposal with regard to its contribution to the establishment of an efficient and safe public transport system as well as increased connectivity and economic access for previously disadvantaged communities, and improvements to safety and security on site;
- The positive impact on the local community in terms of job creation as well as improvements to public transport and economic access;
- The adverse environmental impacts anticipated and the degree to which these can be mitigated to acceptable levels (which, it has been found through specialist assessment, would be possible, given the context and function of the site)
- The manner in which the proposed development responds to the various specialist assessments and findings; and
- The limited risk associated with the site in terms of incidents pertaining to the fuel storage tanks.

In addition, the following aims of the proposal as well as the greater network with which it is associated have also been considered, noting that the proposed depot would play a supporting role in this, particularly for the Phase 2 trunk routes which provides connectivity between the Southern Suburbs, Wynberg and Claremont, across to the Cape Flats extremities of Mitchells Plain and Khayelitsha

- Development of vibrant areas by removing barriers to access;
- Improvement of connectivity throughout the Metropolitan areas;
- Increased efficiency of people's movement and as an aid to the movement of commuters and development activities.
- Improved access and transportation routes to encourage future development and intensification of use;
- Decrease in walking distances from residential and places of work to public transport facilities; and
- Reinforced convergence on core routes and access points.

Independent specialist assessment has culminated in recommendations to approve the proposed development and to indicate that the impacts of the proposed development would be acceptable, with implementation of mitigation measures. With the implementation of mitigation measures, any impact in this regard (noting that there are none anticipated from a heritage, noise,

or agricultural perspective) can be mitigated to low, or very low negative levels of significance. There are two exceptions with the faunal impact on the WLT movement corridor being medium (-), with mitigation, but this impact is considered acceptable in terms of the SCC SEI (Jackson & Martin, 2021). The other exception is that of potential impacts on groundwater (i.e., contamination of groundwater) which are ranked as medium to Low (-), but Naicker & Muller (2021) confirm that these can be adequately mitigated. The mitigation measures are important and must be implemented. That is why they are included as specifications in the EMPr and are strongly recommended as conditions of authorisation in this Basic Assessment Report. The site also holds capacity in terms of the availability of essential services and the stormwater management plan is aligned with the requirements of the City of Cape Town and freshwater ecologist. The proposal would also provide accessibility and safe public movement through the area as well as support the greater MyCiTi transport infrastructure. There are no significant adverse environmental impacts anticipated whereby impacts would be unacceptable, and so there is, with the information available at present, no reason why the preferred alternative of the proposed development should not be granted Environmental Authorisation in that regard.

It is believed that the alternatives and impacts that have been identified have been adequately addressed through changes in the proposed footprint proposed (e.g., devising a preferred alternative which avoid more sensitive wetland and faunal habitat areas and avoids Bonnytown, while providing a relatively wider faunal movement corridor to the east), or would be mitigated to acceptable levels through the final design and/or the strict implementation of the EMPr. A number of specialists have been involved in order to inform the investigation which provided both independence and transparency in the process as well as appropriate skills and expertise.

The design for the preferred alternative has been a co-operative and iterative process between all parties concerned.

The decision for the authorisation lies with the competent authority and should be taken based on the information provided. While this report contains clarity on issues raised during the pre-application public participation, it is believed that there is, however, not yet sufficient information contained in this report to make the decision because the report still requires the incorporation of comments from I&APs on the post-application draft Basic Assessment Report (i.e., this report). The responses to comments raised during the public review of this report will be delivered in the next iteration of the report i.e., the Final BAR.

The decision should be taken by considering all impacts and the way they weigh up against one another, as well as the I&AP comments and the responses provided thereto. Notwithstanding, a comprehensive pre-application public participation process has already been undertaken and all issues raised to-date have been addressed in this report and in the proposed development where appropriate.

In conclusion, it is believed that the preferred alternative represents responsible development and would be an asset to the community and greater City of Cape Town, which is aligned with spatial planning goals, while not compromising the ecological integrity or function of the site (when considered against the extent to which it currently provides for such services) and that of the nearby sensitive areas of Kenilworth Racecourse Conservation Area and Youngsfield Military base, and having no impact on heritage/cultural areas of value to the communities and in terms of the NHRA. It is therefore believed that the preferred alternative (i.e., Alternative 2)/ the preferred development footprint could be authorised (noting that a specific plan should not be authorised as the details thereof may be further amended), subject to the implementation of the mitigation measures included in this report and the EMPr, and also subject to resolution of any potential issues that may emerge through the current public review of this post-application draft BAR.