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**SUBSTANTIVE AMENDMENT APPLICATION OF THE
ENVIRONMENTAL AUTHORISATION FOR THE
INDUSTRIAL DEVELOPMENT ON FARM NO 168/32 AND A
PORTION OF FARM 168/33, DURBANVILLE**

REVISED DRAFT SUBSTANTIVE AMENDMENT REPORT – **FOR COMMENT**

DATE: MAY 2026

REF NO: 22045-IDF-GES-SAR-002

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The Author / Environmental Assessment Practitioner (EAP) herewith confirms the correctness of the information provided in this Report, including supporting documents and reports, subject to the disclaimer above. In addition, confirms the incorporation of comments and issues received in writing from registered interested and affected parties (I&APs); the inclusion of inputs and recommendations from the specialist reports where relevant; and that the information provided by the EAP to I&APs and any responses by the EAP to comments and issues presented by I&APs are correctly reflected herein.

Neither Legacy EMC, nor any of the authors of this Report have any material present or contingent interest in the outcome of this application, nor do they have any pecuniary or other interest that could be reasonably regarded as being capable of affecting their independence or that of Legacy EMC. Legacy EMC has no beneficial interest in the outcome of the assessment which is capable of affecting its independence.



Lauren Abrahams

Environmental Assessment Practitioner

Signature of the Environmental Assessment Practitioner

Legacy Environmental Management Consulting (Pty) Ltd.

Name of the Company

25 May 2026

Date

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Terminology

The following abbreviations are used in this Report:

Abbreviations	Description
BPEO	Best Practical Environmental Option
CCT	City of Cape Town
CA	Competent Authority
CBA	Critical Biodiversity Area
DFFE	National Department of Forestry, Fisheries and the Environment
DEA&DP	Western Cape Department of Environmental Affairs and Development Planning
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EAPASA	Environmental Assessment Practitioners Association of South Africa
EIA	Environmental Impact Assessment
EIR	Environmental Impact Report/Reporting
EMC	Environmental Management Consulting
EMPr	Environmental Management Programme
ESA	Ecological Support Areas
FIA	Freshwater Impact Assessment
GNR	Government Notice Regulation
HWC	Heritage Western Cape
I&APs	Interested and/or Affected Parties
IEM	Integrated Environmental Management
MAMSL	Metres Above Mean Sea Level
NEMA	National Environmental Management Act, (Act No 107 of 1998)
NID	Notice of Intent to Develop
ngl	natural ground level
PPP	Public Participation Process
SAR	Substantive Amendment Report
SCC	Species of Conservation Concern
STR	Screening Tool Report
SSVR	Site Sensitivity Verification Report

1 INTRODUCTION

1.1 Background to Project and Previous Amendments

Pinetop Estates (Pty) Ltd (hereafter referred to as *the Proponent*) obtained Environmental Authorisation (EA) from the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP) on **30 January 2017** for the *Establishment of an Industrial Development on Portion 32 and Portion 33 of Farm No. 168, Durbanville*.

The **Environmental Authorisation (2017)** states that:

“The holder is herein authorised to undertake the following related to the listed activities: The proposed project entails the development of approximately 6 100 storage units and associated infrastructure on Portion 32 and a portion of Portion 33 of Farm No. 168, Durbanville.

The proposed development will be approximately 20.5 ha in size and will comprise storage units, an open space (Special Open Space) erf, roads, and associated infrastructure. Each storage unit will be double-storey.

Portion 33 of Farm No. 168 will be subdivided into two portions, namely Portion A and a Remainder. Portion A will be further subdivided into three portions, namely Erf 1, Erf 2 and Erf 3. Erf 1 will then be consolidated with Portion 32 of Farm No. 168 for the purposes of storage. Erf 2 will be subdivided from Portion 33 to create a public road, and Erf 3 will form part of the future extension of Darwin Road.

The existing bridge crossing and gravel road on Portion 32 of Farm No. 168 will be upgraded to provide access to the southern portion of the property.

The portions of the property that fall within the 1:100-year floodline and/or within 30 m from the top of the bank of the tributary will be rezoned to Open Space 3 (Special Open Space) and will not be developed.

All existing buildings on the property will be demolished.

Access is proposed from a new Class 4 road that will eventually connect the existing Pastoral Street with Kilpheuwel Road. The proposed Class 4 road will run along the northern boundary of the property, and two accesses are proposed from this road. The first access is a traffic circle which will include a temporary leg servicing Portion 33 of Farm No. 168 until Darwin Road is extended. Approximately 294 m westwards from the traffic circle, a secondary access is proposed opposite the future access to County Fair.

Stormwater runoff will be attenuated and subjected to pollutant removal in accordance with the City of Cape Town’s Sustainable Urban Drainage Systems (SuDS) policy before being released into the stream. Attenuation of peak stormwater runoff is proposed by means of infiltration swales and/or detention ponds along the property boundaries.

Sewage generated by the proposed development will drain into a centralised storage tank, from where it will be pumped to the City’s sewerage network along Darwin Road.”

In **2021**, the Proponent submitted an amendment application to address administrative aspects of the authorisation, resulting in a revised EA issued on **12 July 2021**. The amendment extended the validity period of the original EA by five (5) years, stipulating that the authorisation will lapse if the approved activities do not commence by **30 January 2026**.

Since the approval of the original and amended authorisations, the Proponent has reassessed the feasibility and land-use potential of the site. The revised development concept seeks to broaden the

approved land use from a mono-functional storage estate to a **multi-functional industrial park**, accommodating a range of **general industrial activities** such as warehousing, workshops, offices, container site and pre-cooling facilities.

The initial proposed development included a double-level storage facility including 6100 storage units and 62 parking bays (Figure 1) as well as other linear infrastructure, collectively referred to as the “initial proposed development”. The revised phased development layout includes a precooling facility, distribution centre, maintenance workshop, office buildings, light industrial warehouses, container staging as well as an internal road network, service infrastructure (Figure 2), three stormwater retention ponds and stormwater infrastructure (Figure 3). The stormwater ponds will be designed to incorporate Sustainable Drainage Systems (SuDS) for the development, releasing stormwater into the unnamed tributary of the Mosselbank River from the stormwater ponds in an attenuated manner (Peter Wium Consulting Engineer, 2025). Portions I and H, as set out in the subdivisional plan will be developed in phases.

Portion I development phasing will broadly consist of three development phases as set out hereunder: Phase one of the proposed development will include the construction of the workshop (industrial park) and gatehouse, Phase two will include the construction of the container storage area, and Phase three will include the construction of the remaining precooling facility, the remaining office blocks and warehouse. (Figure 4)

Portion H includes the development of the warehousing and distribution units will take place in four phases (Figure 5).

Ancillary and associated infrastructure will be developed as required during the construction phase of the project and will broadly include the development of associated roads, services infrastructure, stormwater infrastructure, and electrical substation.

Infrastructure development will include but may not be limited to:

The development area to the north of Upper Mosselbank River (Erven 1992, 1993 and 2006) should drain to a proposed new regional pump station next to Darwin Road. It has been identified that the following bulk infrastructure (refer to Figure 6) would be required to establish the pump station:

- New pump station on the adjacent Erf 1991. A servitude will be required in favour of the City until Erf 1991 is developed when the servitude will be conveyed to an erf.
- New rising main from the new pump station to the existing 900 mm Ø sewer collector on Farm 724/5. The rising main will be situated within the road reserve of Darwin Road extension.

The development area to the south of Upper Mosselbank River (Erf 1995) should connect to the 825mm Ø collector sewer traversing the erf.



Figure 1: Initial proposed layout for the proposed development associated with the study area (TV3 Architects and Town Planners (Pty) Ltd, 2016).



Figure 2: Revised proposed layout for the development associated with the study area (Mike Paterson Associates cc, 2026).

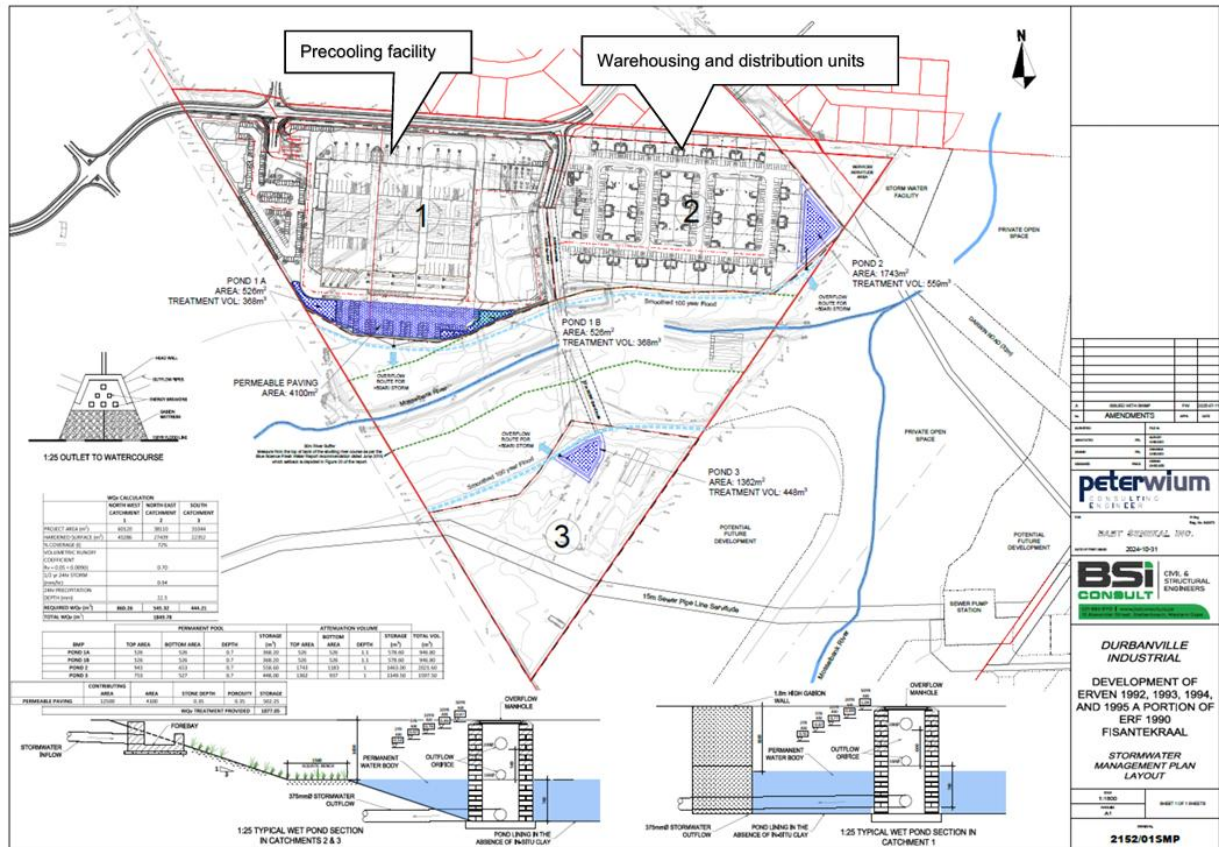


Figure 3: Draft proposed layout for the stormwater infrastructure associated with the study area (BSI Consult, 2025). For illustration purposes.

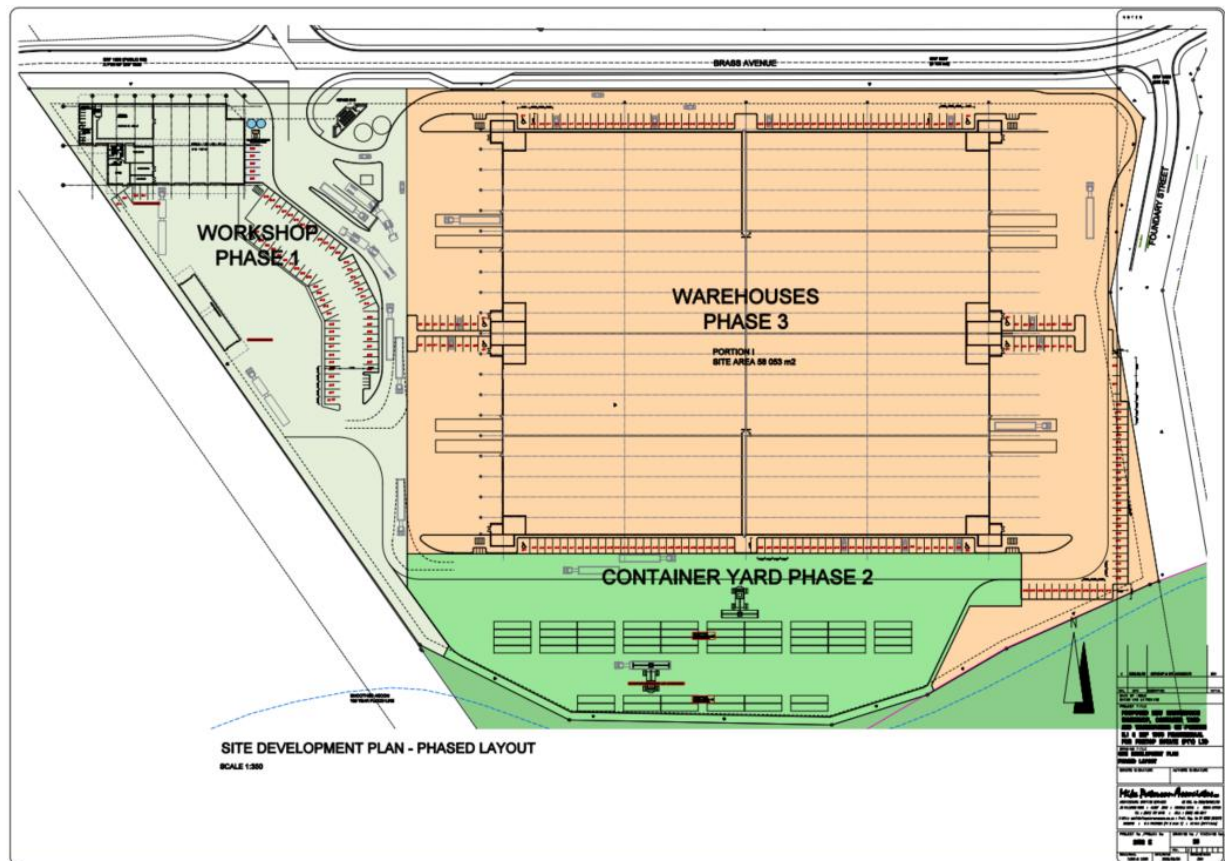


Figure 4: Portion I - Development Phasing Plan (Mike Paterson Associates cc, 2026).

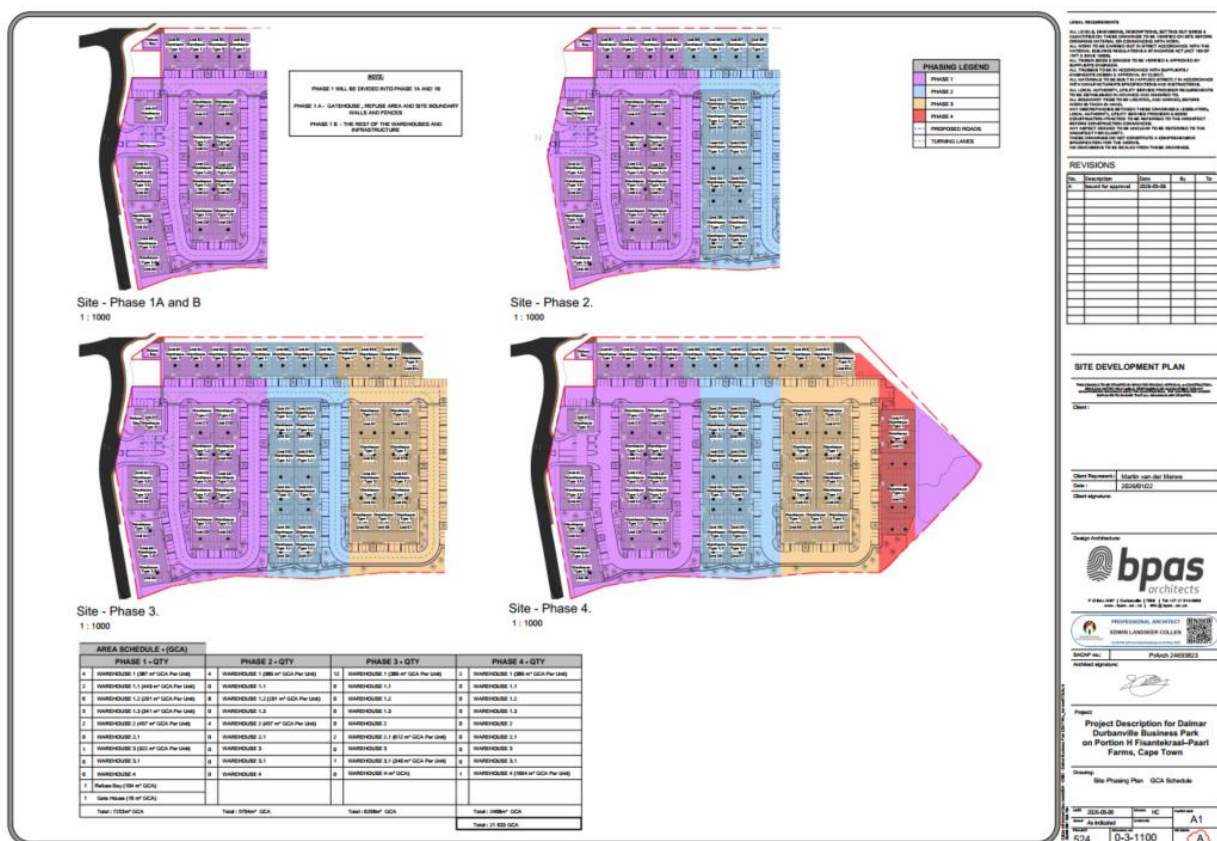


Figure 5: Portion H - Development Phasing Plan (Bpas Architects, 2026)

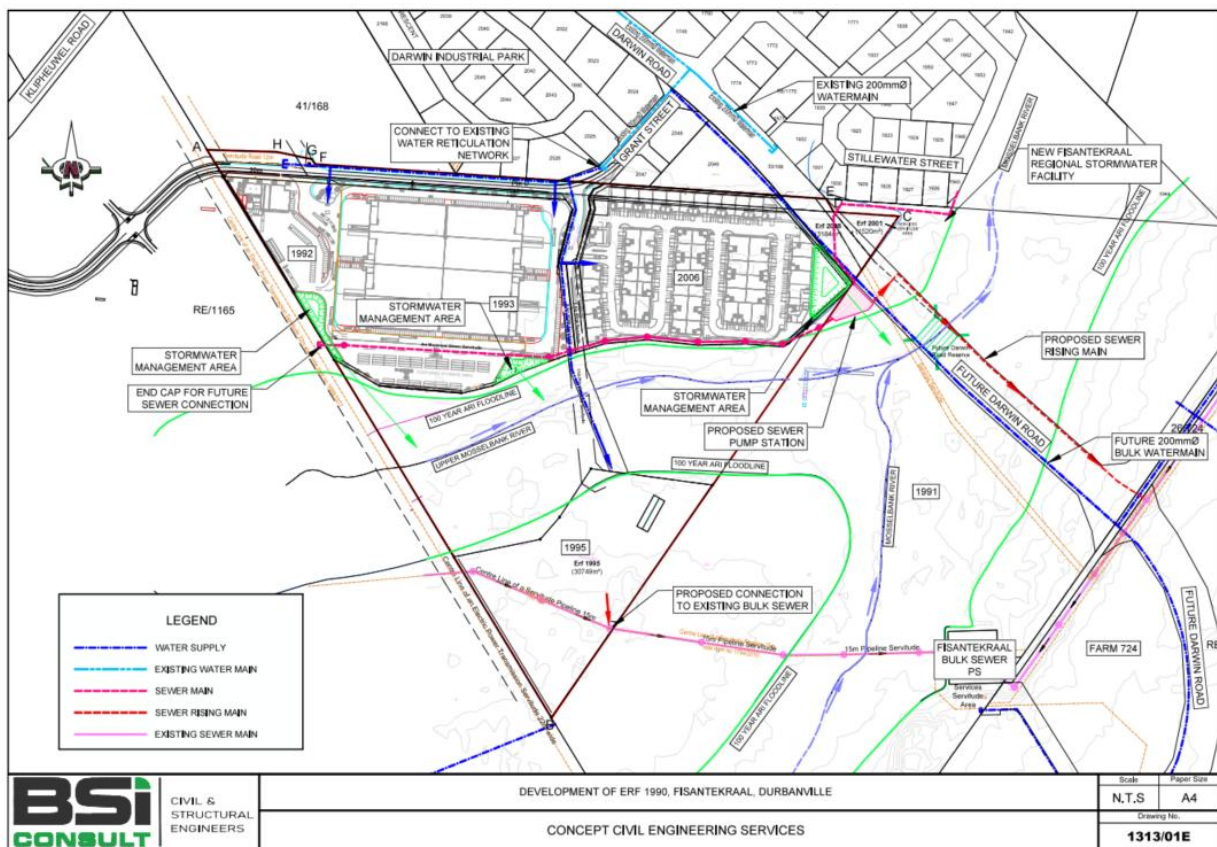


Figure 6: Concept civil engineering services layout (BSI consult, 2026)

Accordingly, this amendment application is submitted to:

- Obtain approval for the **change in land use** from *storage units* to *general industry*;
- **Revise the approved Site Development Plan (SDP)** to reflect updated layout, access, and infrastructure arrangements; and
- **Extend the validity period** of the existing Environmental Authorisation to enable phased implementation of the proposed industrial development.

Through this amendment application, the Proponent—Pinetop Estate (Pty) Ltd—seeks to maintain compliance with the National Environmental Management Act, 1998 (Act No. 107 of 1998) (“NEMA”) and the Environmental Impact Assessment Regulations, while ensuring that the project continues to balance residential growth, environmental stewardship, and the socio-economic needs of the Fisantekraal and surrounding community.

1.2 Proposed Amendments

Pinetop Estates (Pty) Ltd, the holder of the Environmental Authorisation (EA) (hereafter referred to as “the Proponent”), seeks approval for amendments to the *Establishment of an Industrial Development on Portion 32 of Farm No. 168 and Portion 33 of Farm No. 168, Durbanville*. The development was originally authorised by the DEA&DP on 30 January 2017 and subsequently amended on 12 July 2021.

Previously Approved SDP (2016 – Storage Units)

- **Land Use:** Exclusively **storage units** (double-storey, 18 m² footprint each).
- **Scale:** ±6,100 units across 4 erven (Erf 1–4).
- **Total Area:** ±126,242 m² (≈20.5 ha).
- **Coverage:** ±54,900 m² (≈43.5%).
- **Floor Area:** ±109,800 m².
- **Parking:** 62 bays (calculated at 1 bay per 100 units).
- **Subdivision:** Portion 33 split into Erf 1, Erf 2 (public road), Erf 3 (Darwin Road extension).
- **Environmental Controls:**
 - Rezoning of floodline/buffer areas to **Open Space 3 (Special Open Space)**.
 - 30 m river buffer and 1:100 year floodline respected.
- **Access:** New Class 4 road with traffic circle and secondary access; bridge and gravel road upgraded.
- **Infrastructure:**
 - Stormwater attenuation via swales/detention ponds.
 - Sewage via centralized tank → pumped to Darwin Road sewer.

Proposed SDP (2026 – General Industrial)

The total development footprint is **204825m²** which broadly comprises of the following:

- **Land Use: General Industry Subzone I** — mix of **warehousing, workshops, offices, container site**.
- Portion I (Warehousing, distribution, Container site, Industrial Area (Park), Gatehouse, and offices) which has a development footprint of **58053m²**
 - Phase 1 = 2415 m²
 - Industrial Area (Workshop) including 25 parking bays = 2403 m²
 - Gatehouse = 12 m²
 - Phase 2 = 1646 m²
 - Container Staging = 1646 m²
 - Phase 3 = 21614m²
 - Warehousing (Warehousing and distribution) including 230 parking bays = 21654 m²
 - Attenuation Ponds = 1339 m²
 - Pond A = 338 m²
 - Pond B = 457 m²

- Pond C = 544 m²
- Portion H (Warehousing and distribution including associated infrastructure and ancillary Office) which has a development footprint of **39448m²**
- Erf 1995 (Industrial Park) which has a development footprint of **30749m²**
- Open Space Zone (River and buffer areas which traverse the property) which has a footprint of **59909m²**
- Portion J – Transport Zone (Public Road) which has a development footprint of **11616m²**
- Transport Zone (Public Road) which has a development footprint of **3184m²**
- Portion G (Eskom Electrical substation) which has a development footprint of **346m²**
- Utility Zone - Services Servitude area which has a development footprint of **1520m²**
- **Subdivision/Servitudes:**

Amendment of the existing approved subdivision plan (Plan No. 1) in respect of Portion 32 and 33 of Farm 168 now unregistered erven 1990 and 1991 which amendments are reflected in attached Plan No. 2 (Appendix B5) and Table 1

 - The cancellation of unregistered erven 1992,1993 and 1997 to create a new single consolidated Portion A (General Industry Subzone I);
 - The cancellation of unregistered Erf 2006 to be substituted with two new subdivided portions depicted as Portion B (General Industry Subzone I) & C (Utility Zone / Electrical Substation);
 - The cancellation of unregistered erven 1998 and 2007 to create a single consolidated Transport Zone II (Public Road) Portion D; and
 - The cancellation of approved 8,5m right of way servitudes over unregistered Erf 1993 and Erf 2006 respectively.

Table 1: Development Schedule for Amended Subdivision Erven 1990 and 1991

Proposed Consolidations & Development Schedule					
Annotation	Zoning	Use	New Ptn	Proposed Consolidations & Retained Erven	Area
	General Industry Sub Zone GI 1	Warehousing, Distribution & Ancillary Office	H		39448m ²
	General Industry Sub Zone GI 1	Warehousing, Distribution, Workshop & Container Site	I	Consolidation of unregistered Erf 1992, Portions B and C	58053m ²
	General Industry Sub Zone GI 1	Industrial (Park)		Unregistered Erf 1995 retained	30749m ²
	Open Space Zone 3	Special Open Space (Private)		Unregistered Erf 1996 retained	59909m ²
	Transport Zone 2	Public Road	J	Consolidation of unregistered Erf 1998, Erf 2007 and Portions A, D, E and F	11616m ²
	Transport Zone 2	Public Road		Unregistered Erf 2008 retained	3184m ²
	Utility Zone	Eskom Electrical Substation	G		346m ²
	Utility Zone	Services Servitude Area		Unregistered Erf 2001 retained	1520m ²
Total					204825m²

- **Environmental Controls:**
 - Floodline rezoning to Open Space 3 retained.
 - Stormwater management upgraded for industrial runoff.
- **Access:** Same Class 4 road principle, but circulation revised for truck movements.

- **Infrastructure:**

- Stormwater pollutant removal per SUDS policy.
- Sewage system scaled for industrial effluent volumes.

The key amendments which pertain to this application includes:

- **Land Use Change**

- From storage-only to **general industrial** (manufacturing, warehousing, offices, workshops).

- **Layout Revision**

- Storage blocks replaced with **phased industrial facilities**.
- Parking recalculated for industrial/offices.

- **Infrastructure Adjustments**

- Stormwater and sewage systems scaled for industrial use.
- Access roads and yards designed for heavy vehicle circulation.

- **Environmental Commitments**

- Floodline rezoning and buffers unchanged.
- Sustainable drainage retained.

- **Subdivision & Servitudes**

- ROW servitudes introduced for truck access.
- Erf consolidation/subdivision suit industrial layout, as well as an electrical substation.

- **EA Validity**

- The EA was initially valid for five (5) years from the date of issue (30 January 2017), later extended to five (5) years from the amended EA (12 July 2021).
- The amended EA states: "The validity period of the Environmental Authorisation issued on 30 January 2017 is extended by five (5) years and shall lapse if the activities do not commence by 30 January 2026."
- Accordingly, as part of this amendment application, an extension of the EA validity period is also being requested.

Therefore, in summary the amendment seeks to extend the validity of the existing EA as well as to broaden the project from a mono-functional storage estate into a **multi-functional industrial park**, while keeping the environmental safeguards and access principles intact.

Refer to the SDP's in **Appendix B2.1 (proposed SDP Erf 2006 – Portion I); Appendix B2.2 (proposed SDP Erf 2006 – Portion H); Appendix B3 (Previously approved SDP); and the Subdivisional Plan in Appendix B4.**

The Holder of the EA has appointed Legacy Environmental Management Consulting (Pty) Ltd. (Legacy EMC) to undertake the required amendment process in terms of the National Environmental Management Act, Act No. 107 of 1998 (NEMA, as amended) and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended).

The proposed amendments are deemed to be **substantive** in nature, and therefore require that a Part 2 Amendment Process, inclusive of public participation, be undertaken. The amendment process is described in Section 2 of this Report.

2 LEGISLATIVE REQUIREMENTS

2.1 Part 1 and Part 2 Amendment Process

In terms of Regulation 29 of the NEMA EIA regulations, 2014 (as amended) a **non-substantive** (or Part 1) amendment application is required in the following instances:

An environmental authorisation may be amended by following the process prescribed in this Part if the amendment -

(a) will not change the scope of a valid environmental authorisation, nor increase the level or nature of the impact, which impact was initially assessed and considered when application was made for an environmental authorisation; or

(b) relates to the change of ownership or transfer of rights and obligations.

Although the proposed amendments will not alter the overall scope, intent, or footprint of the valid Environmental Authorisation (EA), the Department of Environmental Affairs and Development Planning (DEA&DP), as the competent authority, has advised that the amendments do constitute changes to the nature and extent of certain authorised activities. These changes give rise to potential differences in environmental impacts, particularly in relation to visual impacts and stormwater management interventions.

On this basis, the proposed amendments are being processed as a **Part 2 (substantive) amendment application**, in terms of **Regulations 31–33 of the 2014 Environmental Impact Assessment (EIA) Regulations, as amended**. This process ensures that the revised design and associated impacts are comprehensively assessed that specialist input (where deemed necessary) is incorporated where required, and that the Environmental Management Programme (EMPr) is updated to reflect the amended mitigation and monitoring requirements.

As per Regulation 32 of the EIA Regulations, 2014 (as amended), a substantive amendment application must be accompanied by a report, which reflects the following information:

-  A description of the amendment being applied for;
-  An assessment of all impacts related to the proposed change;
-  The advantages and disadvantages associated with the proposed change;
-  The measures to ensure avoidance, management and mitigation of impacts associated with such proposed change; and
-  Any changes to the Environmental Management Programme (EMPr).

This Substantive Amendment Report has been prepared in response to the requirements of Regulation 32 and meets the above content requirements.

2.2 Specialist and Technical Inputs

In response to the Department of Forestry, Fisheries and the Environment (DFFE) Screening Tool, a Site Sensitivity Verification Report (SSVR) was submitted to DEA&DP. The motivations for or against undertaking the specialist studies as required by the Screening Tool (**Appendix D**) are contained within the SSVR, attached as **Appendix E**.

Legacy EMC has considered the findings of the STR and the requirements of the DFFE Protocols in relation to the nature, scale and location of the development proposed and the current land use, and is of the opinion that the following specialist and technical inputs be undertaken as part of the amendment application (subject to feedback from DEA&DP on this SSVR):

Table 2: Specialist and Technical Study Addendum Reports to be prepared

Specialist Study Addendum	Contact Person	Company
Freshwater Specialist – Impact Statement	Stephen van Staden	FEN Consulting
Traffic Impact Statement	Eric Foster	EFG Engineers
Engineering Services	Lukas Louw	Bart Senekal Ing
Stormwater Management Plan	Peter Wium	Peter Wium Consulting Engineers
Market Study	Dr. Hein du Toit	Demacon

Summary of Specialist Input:

1. Freshwater Specialist – Impact Statement, *FEN Consulting*, June 2025. [Appendix C5]

Following the completion of the assessment, the Department of Water and Sanitation (DWS) Risk Assessment Matrix (2023) was conducted and recommendations were developed to address and mitigate any potential negative ecological impacts associated with the project. These recommendations also include general management measures, which apply to the proposed construction and operational activities. Control measures have been developed to address issues in all phases throughout the life of the project including construction and operation.

The DWS RAM (2023) indicated that an overall ‘Low’ risk significance to the integrity of the freshwater ecosystems is expected, with a “Moderate” risk significance to the integrity of the unnamed tributary of the Mosselbank River, due to the proposed upgrade of the road bisecting the tributary, as well as the construction and operation of stormwater infrastructure within the study area which will release stormwater into the downgradient freshwater ecosystems (Appendix F). The demolition activities are anticipated to pose a “Low” risk significance to the freshwater ecosystems assuming that the rubble will not be discarded within the tributary or the 30 m conservation buffer and will be disposed of at a licenced waste processing facility on completion of all demolition activities. Construction rubble may however be used on site as part of the road construction (infill) should the developer so desire (where feasible). A routine monitoring and maintenance plan must be compiled and implemented to manage stormwater infrastructure associated with the proposed development, including maintenance of the retention ponds, pipelines and stormwater attenuation system in terms of the integrity of the structures, damage control (including erosion), and the removal of litter, rubble, sediment and weeds, as outlined in the Stormwater Management Plan (SWMP) (Peter Wium Consulting Engineer, 2025).

The following control measures must be implemented, along with the control measures stipulated in the associated freshwater report (BlueScience, 2016):

- Construction of the proposed development must preferably be undertaken during the dry summer period to minimise the volumes of sediment entering the freshwater ecosystems and to minimise water quality impacts;
- Sediment traps must be installed downgradient of the construction works prior to the commencement of construction, to prevent excess sediment from entering the freshwater ecosystems. Sediment traps are to be inspected daily and accumulated sediment to be removed by hand on a weekly basis;
- Soil removed from the construction area must not be stockpiled within the 30 m conservation buffer and exposed soil must be protected for the duration of the construction phase with a suitable geotextile (e.g. Geojute or hessian sheeting) to prevent erosion and sedimentation of the river. Mixture of the lower and upper layers of the excavated soil should be kept to a minimum, so as for later usage as backfill material or as part of rehabilitation activities, and the stockpiles may not exceed 2 m in height;
- Suitable dust management practices must be implemented for the duration of construction and the National Dust Control Regulations, GN 827 of 2013, should be complied with at all times;
- In all events all machinery and vehicles used during construction must be maintained and equipped with drip trays to prevent oil, petrol or diesel leaks. If breakdowns occur these vehicles must be towed offsite to the designated areas/workshops. An emergency spill plan must also be established and implemented for the operation of the proposed workshop. The proposed control measures will ensure that incidental oil spills and leakage are minimised onsite and thus limit any opportunities of water contamination and water quality deterioration;
- The proposed parking areas and internal road network must incorporate permeable paving or Permeable Interlocking Concrete Pavement (PICP) as a SuDS for the proposed development;
- In the context of the SWMP, compiled by Peter Wium Consulting Engineer (2025), applying the principles of SuDS must be implemented for the proposed development to allow for subsurface infiltration of stormwater, minimising the amount of surface runoff and the associated contribution to flood peaks of the Mosselbank River and its associated UCVB wetland;
- Proliferation of Alien and Invasive Plant species (AIPs) as a result of the construction and operation related disturbances must be monitored and controlled;
- Moderate rehabilitation of the disturbed areas must be undertaken, including removal of existing rubble and building material, control of opportunistic *Phragmites australis* and re-vegetation exclusively with indigenous vegetation to increase biodiversity of the freshwater ecosystems, inclusive of the 30 m conservation buffer that might have been impacted by the construction of the proposed development and road upgrade, thus contributing to improvement the PES of these systems;
- Following rehabilitation activities, a suitable Alien Invasive Management Plan (AIMP) must be implemented to ensure that AIPs do not become established within the areas disturbed by construction activities; and
- General good housekeeping practices must be implemented during all phases of the proposed residential development, to ensure limited direct, indirect and cumulative impacts to the receiving freshwater environment.

As part of the development and operation of the stormwater ponds, the following control measures must be implemented specifically:

- Stormwater ponds must be vegetated with indigenous obligate and facultative hydrophytes suitable for seasonal saturation. This will assist with energy dissipation and prevent sedimentation and erosion as well as improve habitat provision;
- Cobbles must be placed on the concrete aprons to further assist with energy dissipation;
- All materials used to construct the stormwater ponds should not generate toxic leachates or lead to significant changes in pH or dissolved salt concentrations; especially considering that outflow of the pond drains into the unnamed tributary of the Mosselbank River;
- No plastic lining may be used as part of the stormwater ponds' construction as this has various ecological impacts, with special mention of impacts to faunal assemblages;
- Rocks must be placed at any outlet pipes (downgradient of the stormwater ponds), as required and indigenous vegetation established to bind the soil of the bed and to prevent erosion. This will also

promote diffuse flow and decrease the velocity of water released downgradient towards the unnamed tributary of the Mosselbank River and the UCVB wetland;

- The operation of the stormwater management system must ensure that stormwater is released into the unnamed tributary of the Mosselbank River in an attenuated manner to mimic natural flow velocities as far as feasibly possible; and
- Regular inspection of the stormwater management system and associated landscaped areas must be undertaken (specifically after large storm events) in order to monitor the occurrence of erosion, particularly of the landscaped areas surrounding the stormwater attenuation system. If erosion has occurred, it must immediately be rehabilitated through stabilisation of the embankments and revegetation with indigenous vegetation.

In conclusion, considering that significant effort has been made to avoid direct impacts on freshwater ecosystems, particularly with regards to the unnamed tributary of the Mosselbank River and the 30 m conservation buffer, it is the opinion of the freshwater specialist that the development may proceed. The proposed new development layout is considered acceptable from a freshwater ecological and resources management perspective.

2. Traffic Impact Assessment, EFG, June 2025 [Appendix C4.1]

This section summarises an assessment of the transport-related impacts expected as part of the proposed development planned in Fisantekraal. Based on this assessment, the following can be concluded.

Based on the findings of this study, the following conclusions can be drawn:

- Existing approvals are in place for Erven 1992, 1993 & 1997, Erf 1995; and Erf 2006 (previously Portion 32 of Farm 168) for General Industrial Zone 1 (GI1) land use to accommodate 6100 mini storage units.
- The current application is to amend the Development Rights to still permit a General Industrial Zone 1 (GI1) land use but not to restrict this to mini storage units.
- The amended development consists of three development pockets as follows:
 - Consolidated Erven 1992, 1993 & 1997: This development pocket will include a Warehousing and Distribution Centre (primarily cold storage), some workshops and offices associated with the Distribution Centre.
 - Erf 2006: This will include smaller warehouse units.
 - Erf 1995: which will include an industrial land use (not restricted to warehousing)
- A SDP will be submitted for Erven 1992, 1993 & 1997, and Erf 2006 as part of this application. The submission of a SDP for Erf 2006 will however be part of a future application.
- A 17 m wide servitude right of way will be provided to access Erf 1995 and an adjoining development, Phase 4 of Erf 1991 (previously Portion 33 of Farm 168)
- The GLA of the three pockets of Development that fall under this application are as follows:
 - Consolidated Erven 1992, 1993 & 1997: General Industrial 1 (GI1) use comprising of Four Phases with a total GLA of 24 538 m² and which is broken down as follows: 16 173 m² Warehousing & Distribution (Refrigeration); 3 057 m² Warehousing & Distribution; 1 458 m² Industrial Area (Maintenance Workshops); and 3 850 m² Offices (integral to the underlying industrial zoning).
 - Erf 2006: General Industrial 1 (GI1) use comprising of 4 Phases with a total GLA of 20 699 m² which will comprise of Warehousing & Distribution (58 small warehousing units);
 - Erf 1995: General Industrial 1 (GI1) use with a total GLA of 13 068 m². Provision is made for an industrial park (i.e. not limited to warehousing).
- The trip generation for the previously approved development was estimated at 162 trips during the AM peak hour and 105 trips during the PM peak hour. The revised trip generation for the current proposal is 398 trips during the AM peak hour and 398 trips during the PM peak hour which is an increase of 236 and 293 trips in the AM and PM peak hours respectively.
- There are an additional 233 trips (163 IN and 70 OUT in AM peak hour and 58 IN and 175 OUT in the PM peak hour) from an adjacent erf (Phase 4 of Erf 1991) that will access the external road network via a servitude right of way across this development.

- ITS have carried out a TIA for the adjacent development of Erf 1991 and RE/5/724. The TIA made recommendations towards road improvements required for existing traffic conditions and for 2029 conditions with background growth and the full development of Erf 1991 and RE/5/724.
- ITS were then requested to carry out a new TIA to include the additional rights for this application, i.e. the development of Erven 1992, 1993 & 1997, Erf 1995; and Erf 2006.
- The initial and additional road improvements (as a result of the change in development parameters) as determined by the two TIAs can be summarised as follows:

For the existing 2024 traffic conditions the road improvements were already required at:

- Intersection 1:
 - Klipheuwel Road/Lichtenburg Road
 - Northbound – Construct a dedicated right-turn lane.
 - Southbound – Construct a dedicated left-turn lane.
 - Westbound – Construct a dedicated right-turn lane.
 - Intersection control – Warrants a traffic signal upgrade.

Once Erf 1991 and RE/5/724 development traffic is added then for future 2029 conditions, with background growth and latent development, the following additional improvements are required:

- Intersection 1: Klipheuwel Road/Lichtenburg Road
 - Northbound – Construct an additional dedicated right-turn lane.
 - Westbound – Construct a left-turn slip lane.
- Intersection 2: Klipheuwel Road/Darwin Road
 - Northbound – Construct an additional through lane.
 - Southbound – Construct an additional through lane.
 - Westbound – Construct a dedicated right-turn lane and shared right- and left-turn lane.
 - Intersection control – Warrants a traffic signal upgrade.
- Intersection 3: Darwin Road/Pastorale Avenue
 - Intersection control – Construct a single-lane roundabout.
- Intersection 4: Klipheuwel Road/Okavango Road
 - Southbound – Construct an additional through lane.

The 2029 Total Traffic conditions are based on Background Traffic Conditions volumes, plus the proposed development trips. This traffic scenario assumes that the upgrades recommended in the 2029 Background Traffic Conditions will be in place. The following intersection upgrades are recommended for this scenario:

- Intersection 2: Klipheuwel Road/Darwin Road
 - Westbound – Construct a left-turn slip lane and convert the shared right- and left-turn lane to a dedicated right-turn lane.
- The road improvements as recommended should be implemented with Development Contributions from: any previously approved developments where DCs have not yet been or used; the development of Erf 1991 and RE/5/724; and the development of Erven 1992, 1993 & 1997, Erf 1955, and Erf 2006.
- The ITS TIA for Erf 1991 and RE/5/724 estimated the total Roads and Transport DCs for known development in the area at R 367 million (Incl VAT). This was adjusted downwards to R 342 million (Incl VAT) taking into account a lower Roads and Transport DC value for the development of Erven 1992, 1993 & 1997, Erf 1955, and Erf 2006 which is now estimated at R 14.88 million (Incl VAT) instead of R 39 million (Incl VAT).
- The intersection improvements required for the two developments (Erf 1991 and RE/5/724 plus Erven 1992, 1993 & 1997, Erf 1955, and Erf 2006) as detailed in the TIA would also need to be funded by DCs.
- A high-level cost estimate (see Table 5.3) for constructing these road improvements which includes P&G, contingencies and design fees is estimated at R 19 million (Including VAT).

- It is understood that there are plans to fund the initial intersection improvements and signalisation of the Klipheuwel/Lichtenburg intersection through currently available Roads and Transport DCs from one of the developments. This then leaves approximately R 13.7 million (Incl VAT) of improvements that can be implemented with the Roads and Transport DCs of R 14.88 million (Incl VAT) from the development of Erven 1992, 1993 & 1997, Erf 1955, and Erf 2006.
- There are significant and sufficient DCs available from surrounding known developments to implement the proposed intersection improvements and the proposed extension of Darwin Road. It is therefore recommended that the City enter into a Service Level Agreement with the Developer of Erven 1992, 1993 & 1997, Erf 1955, and Erf 2006 to enable the City to prioritise and implement required road improvements with DCs from this development as and when necessary and as the development proceeds.
- The position of the main access to Erven 1992, 1993 and 1997 is from Brass Avenue. As previously planned the main access is opposite the proposed access to the property to the north (Farm 168/41).
 - The main access configuration makes provision for one lane IN (6m wide) and one lane OUT (5 m wide) in order to accommodate the truck movements. A departure will be required for the wider carriageway crossing.
 - The truck access (off the main access) makes provision for three truck lanes IN and two truck lanes OUT.
 - A secondary truck access, IN only, is provided from the road on the eastern edge of the site opposite the access to Erf 2006. This access will only be used in peak harvesting season to accommodate additional trucks and thereby limiting any possible negative impact on the main access and Brass Avenue.
 - The access control for light vehicles provides for two lanes IN. The IN lanes can each which can accommodate 3 cars before interfering with the truck exit lane.
 - A refuse embayment is provided in Brass Avenue downstream of the main access.
- The position of the main access for Erf 2006 is from the southern road link from Brass Avenue. This is initially a public road which then continues southwards (just past the proposed access) as a right of way servitude serving Erf 1995, and Phase 4 of the proposed development of Erf 1991.
 - The main access configuration makes provision for one lane IN (6 m wide) which widens to two lanes separated by a 1 m wide median at the access control.
 - There is a 4 m wide island between the entrance and exit lanes.
 - The exit lane is 4 m wide and is wide enough to accommodate emergency vehicles.
 - The wider carriageway crossing will require a departure.
 - The island between the IN and OUT can accommodate pedestrians crossing the wider access.
 - With the access control set back approximately 26 m stacking is not considered to be an issue. o Access to the site will be restricted to light delivery vehicles and small rigid trucks. No articulated trucks will be permitted on-site.
 - A refuse embayment is provided in the public street just before the access. Sight lines from the access have been tested and the position was found to be acceptable.
- Parking for Erven 1992, 1993 & 1997 based on the Bylaw requirements is 369 bays.
 - Although the SDP can accommodate the required rate of 1 bay/100 m² it is motivated that the precooling facility only provide parking at a rate of 0.5 bays/100 m² GLA. This means that the parking could be reduced by 80 bays to 289 bays instead of implementing 369 bays and would be acceptable.
 - It is therefore proposed that the area demarcated for the 80 bays (dotted on the SDP) be kept open as an additional staging area rather than being utilised for parking.
 - Adequate parking is provided for each phase of the development.
- Parking for Erf 2006 based on the Bylaw requirements is 207 bays.
 - The SDP provides 207 bays.
 - In addition, a loading bay/access is provided at each of the 58 individual warehouse units.
 - 3 longer truck embayments (21 m x 3.5 m) that can accommodate a number of smaller trucks are also provided.
- It is recommended that the proposed development include a minimum 1.8m wide pedestrian sidewalk and street lighting along the southern edge of Brass Avenue.

- The ITS TIA for development of Erf 1991 and RE/5/724 proposed that minibus taxi/bus embayments be constructed downstream at the Klipheuwel/Darwin Road intersection and the development access roundabouts along the extension of Darwin Road. Their final locations will be determined with the City during the detail design stage. No additional public transport facilities are recommended for the proposed development.

3. Engineering Services Report, BSi Consult, June 2025 [Appendix C1]

The development proposals on Erf 1990 (unregistered Erven 1992, 1993, 1995 and 2006), Fisantekraal consist of cold storage and warehousing developments. The expected GLA on the different unregistered portions/erven are as follows:

Consolidated erven 1992 and 1993:	24 538 m ² GLA	of cold storage and admin offices
Erf 1995:	13 068 m ² GLA	of warehousing and distribution
Erf 2006:	<u>20 710 m² GLA</u>	of warehousing and distribution
Total:	58 316 m ² GLA	

This report summarises the situation with regard to the provision of the basic civil engineering services, i.e. water supply, sewerage and solid waste removal to the proposed development.

WATER SUPPLY:

The demand for potable water for the proposed development is estimated at 233 kl/day, with peak water demand (peak factor @ 3.2) is estimated at 8.6 l/s. Fire flow is required at 50 l/s.

The development falls within the City of Cape Town's Spes Bona reservoir Zone.

Existing Infrastructure

The following watermain surrounds the proposed development as indicated on the layout plan in Annexure C (**of the Engineering Services Report in Appendix C1**):

- 110 mm Ø pipeline traverses Erf 1995
- 200 mm Ø main along Darwin Road and within Grant Road

The locations of the watermain are indicated on the layout plan in Annexure C (**of the Engineering Services Report in Appendix C1**).

Proposed Infrastructure

Supply of potable water to the development will be from the 200mm Ø watermain within Grant Road. The 200mm Ø watermain along Darwin Road will in future be extended towards the 200mm Ø watermain along Boy Briers Road to ensure sufficient capacity and multiple feeds. The 200mm Ø watermain will be situated within the road reserve of Darwin Road extension.

The detail of the water connections will be agreed with the City at detail engineering design stage.

CCT Capacity confirmation

Feedback from the City of Cape Town is that sufficient spare capacity is available in their bulk water system to service the development. The Water Capacity Analysis report of the City is included as Annexure D (**of the Engineering Services Report in Appendix C1**).

SEWERAGE:

Sewage flow from the proposed development is estimated at 210 kl/day with a peak dry weather flow (peak factor @ 2.5) is estimated at 6.1 l/s.

The proposed development is situated within the catchment of the Fisantekraal Wastewater Treatment Works (WWTW). This treatment works has sufficient unallocated capacity to accommodate this development.

Existing Infrastructure

The bulk sewerage infrastructure of the City of Cape Town near the development site are as follows and indicated on the layout plan in Annexure C (**of the Engineering Services Report in Appendix C1**).

- 825 mm Ø collector sewer traversing Erf 1995 and gravitating towards the Fisantekraal Bulk Pump Station
- Fisantekraal Bulk Pump Station pumping towards the Fisantekraal Wastewater Treatment Works (WwTW)

Proposed Infrastructure

The development area to the north of Upper Mosselbank River (Erven 1992, 1993 and 2006) should drain to a proposed new regional pump station next to Darwin Road. It has been identified that the following bulk infrastructure would be required to establish the pump station:

- New pump station on the adjacent Erf 1991. A servitude will be required in favour of the City until Erf 1991 is developed when the servitude will be conveyed to an erf.
- New rising main from the new pump station to the existing 900 mm Ø sewer collector on Farm 724/5. The rising main will be situated within the road reserve of Darwin Road extension.

The development area to the south of Upper Mosselbank River (Erf 1995) should connect to the 825mm Ø collector sewer traversing the erf.

The concept layout of the regional sewer pump station is provided in Annexure E (**of the Engineering Services Report in Appendix C1**). The detail of the pump station and connections will be agreed with the City at detail engineering design stage.

The City will also require that the existing “Dick Groeneweg” sewer pump station be decommissioned, and the pipework extended across Erf 1991, as indicated on the layout drawing in Annexure E (**of the Engineering Services Report in Appendix C1**), to connect to the new regional sewer pump station.

CCT Capacity confirmation

Feedback from the City of Cape Town is that sufficient spare capacity is available in their bulk sewerage system to service the development. The Sewer Capacity Analysis report of the City is included as Annexure D (**of the Engineering Services Report in Appendix C1**).

SOLID WASTE REMOVAL

Solid waste generated by the development is estimated at 1,75 ton/day. The City of Cape Town will be requested to provide a waste removal service to the development.

CONCLUSION

From the above it is concluded that the required basic civil engineering services, i.e. potable water, sewerage and solid waste removal, for the proposed cold storage and light industrial developments on Erven 1992, 1993, 1995 and 2006 in the Fisantekraal area of Durbanville, can be accommodated by the City of Cape Town in their existing bulk infrastructure, alternatively in the bulk infrastructure items as per the master plans.

4. Stormwater Management Plan, Peter Wium Consulting, June 2025 [Appendix C2]

Note that the Final stormwater report will be provided in the Final SAR once it has been scrutinised by the relevant City officials. Based on the letter in Appendix C2.2 – the amended layout states: ‘Having assessed the two sites (Erf 1992 & 1993 as one, the ‘Go Chill Site’ and Erf 1994, the Dalmar Site’, and noting that there are no fundamental changes to bulk, impervious area, parking and road layouts, contributing catchments or outfalls, it is our considered opinion that the current Stormwater Management Plan, in its entirety, still applies. The design philosophy and stormwater run-off structures previously proposed and the conclusions previously reached, remain exactly the same.’

The project comprises three development areas, referred to below as catchments 1, 2 and 3. Catchments 1 and 2 are located north of the Upper Mosselbank River and Catchment 3 in the south. Mixed-use/Light industrial development is intended for each development area. Runoff from roofs and hardened areas will be conveyed by means of gutters and channels and collected by a system of catchpits. Runoff will then be conveyed through the underground reticulation system to outfall into proposed permeable paving and wet ponds that serve the function of treating and attenuating runoff to the standards specified by The Policy. Storms greater than the 5yr ARI storm, will flow overland via the internal road system.

The figure below, extracted from Annexure A of the SWMP (**Appendix C2 of the Draft SAR**), shows the wet pond sizes and proposed positions, along with the permeable paving area, in the three development areas.

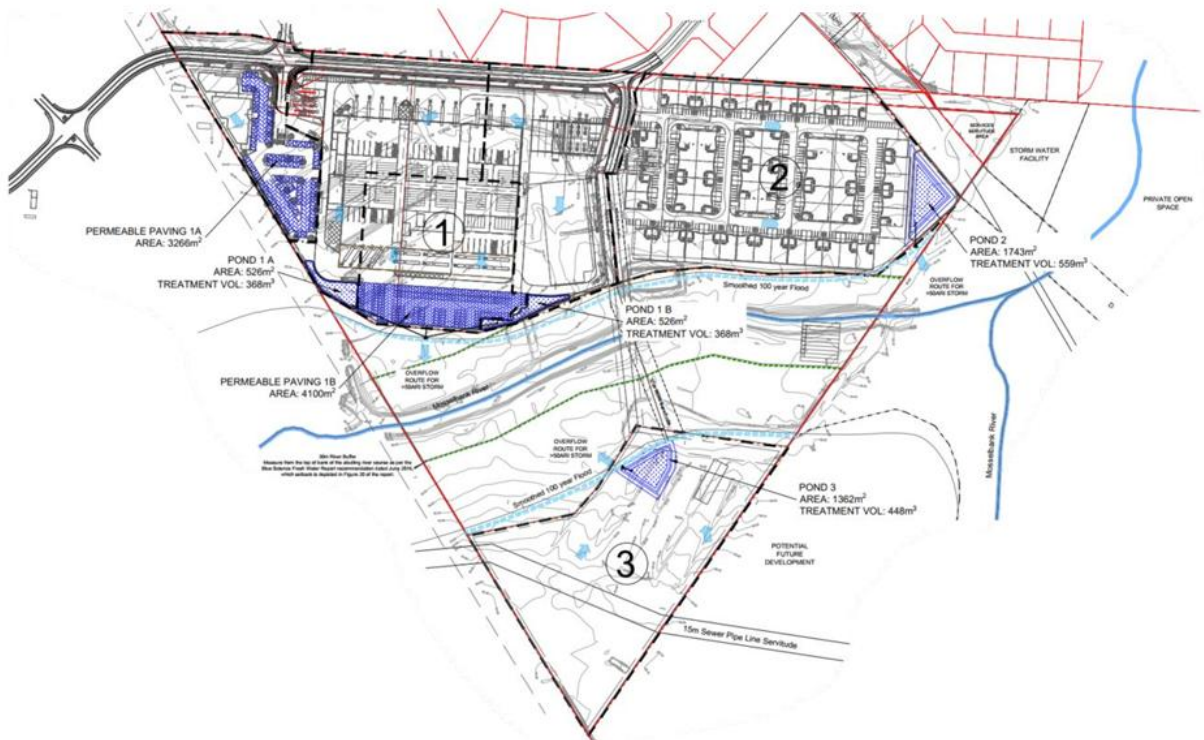


Figure 7: Extract from Annexure A of the SWMP (Annexure C2 of the Draft SAR), drawing showing Wet pond sizes and proposed locations on the Erven. For illustrative purposes.

Discharge from each pond will be via orifices into outflow risers, located in the pond. Orifice size and elevation have been modelled using the Micro Drainage software, to ensure that outflow is less than the calculated pre-development stormwater flows. A 160mmØ orifice at the invert of the attenuation storage, in combination with a 200mmØ 0.5m above the permanent pool controls the outflow at the required rates, as shown in Figure 5 below.

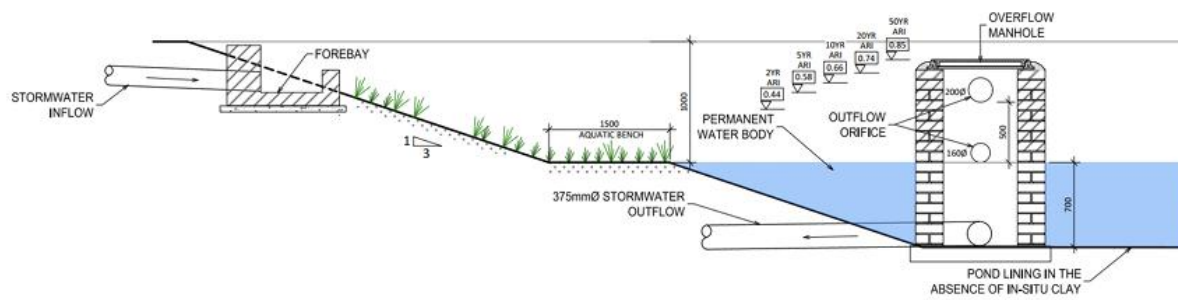


Figure 8: Typical cross section of proposed Wet Pond in Catchment 2 and outflow structures.

Maintenance requirements for Stormwater Infrastructure:

A Stormwater Maintenance Plan for each of the structures must be implemented to ensure the long-term functionality of the system as a whole. These maintenance plans shall be implemented by the Owner of the development initially, ceded to a future Property Owner Association. In general maintenance consists of:

- Maintaining regular inspections of the outflow manholes
- Maintaining regular visual inspections of the stormwater control structure and its performance (drainage time)
- Vegetation must not become overgrown, especially invasive species, which might impeded emergency overflow paths in extreme storm events.

Refer Annexure N, of the **SWMP in Appendix C2 of the Draft SAR** for typical Maintenance Schedules for the proposed BMP Control Structures.

A Landscape Master Plan has been completed for Ptn 32 of Farm 168 and is attached as **Annexure M of the SWMP and Appendix C3 of the Draft SAR**. It sets the vegetation recommendations and requirements for the entire site and in particular, it takes into account the vegetation types required per the City's Landscape and Indigenous Plant Species Guidelines for SUDS structures.

Conclusion:

This SWMP proposes various wet ponds and permeable paving areas to attenuate and treat stormwater run-off. The required volumes are easily accommodated in the control structures proposed.

A total stormwater control structure volume of 6625m³ is provided with a total required volume of 6015 m³. The analysis in this report shows that the required Water Quality Volume (WQV) required for run-off treatment, together with the volumes required to attenuate and reduce the site's peak flows to pre-development levels, can be easily accommodated. Should maintenance not be completed timeously, on the structures and/or the control systems fail temporarily, or in higher order storm scenarios, emergency overflow can be satisfactorily directed overland toward the Upper Mosselbank River.

Tables 3 and 4 below summarize the designed BMP structures.

Table 3: Summary of wet pond volumes proposed.

BMP	PERMANENT POOL				ATTENUATION VOLUME				TOTAL VOL. (m ³)
	TOP AREA	BOTTOM AREA	DEPTH (m)	DEAD STORAGE (m ³)	TOP AREA	BOTTOM AREA	DEPTH (m)	STORAGE (m ³)	
POND 1A	526	526	0.7	368.20	526	526	1.3	683.00	1052.00
POND 1B	526	526	0.7	368.20	526	526	1.3	683.00	1052.00
POND 2	943	653	0.7	558.60	1743	1183	1	1463.00	2021.60
POND 3	753	527	0.7	448.00	1362	937	1	1149.50	1597.50
TOTAL				1743				3978.5	5723.1

Table 4: Summary of permeable paving volumes provided.

	AREA	STONE DEPTH	POROSITY	STORAGE
PERMEABLE PAVING 1A	3266	0.35	0.35	400.09
PERMEABLE PAVING 1B	4100	0.35	0.35	502.25
TOTAL				902.34

Critical storm depths for up to the 50 ARI simulated storm are shown to be contained within the storage volume of the structures, with discharges not exceeding pre-development levels. Minor overflows from

the structures occur in the higher order storms, but the overall post-development outflows into the receiving watercourse, in all storm scenarios, do not exceed the pre- or existing-development condition.

These best management practice structures create a stormwater management system that is appropriate to the site and satisfies the Policy's objectives for controlling run-off at source, by treatment and attenuation, prior to the run-off reaching downstream watercourses.

5. Market Study, Demacon, May 2026 [Appendix C5]

The Durbanville Mixed Industrial Development Market Study (May 2026) was commissioned to evaluate the feasibility, growth potential, and optimal configuration of a proposed mixed industrial park on Portions 32 and 33 of Farm Fisantekraal 168. Its purpose is to provide a comprehensive, market-based assessment that informs strategic planning decisions, including tenant composition, market penetration rates, and development phasing. By analyzing macro- and microeconomic trends, demographic dynamics, competitor supply, and demand modelling, the study aims to establish the most suitable development option and scale, ensuring alignment with regional growth strategies, infrastructure capacity, and socio-economic integration. In essence, it serves as a roadmap for positioning the project as a sustainable, employment-generating industrial hub that leverages its strategic location near Durbanville and the Cape Winelands Airport.

Location Orientation

The proposed development site, comprising Portions 32 and 33 of Farm Fisantekraal 168, is strategically located within the City of Cape Town Northern Region, along the R302 corridor. It lies immediately south of the Durbanville Industrial/Business Park cluster, bridging Durbanville's northern suburbs with the growing settlement of Fisantekraal. The site benefits from proximity to established industrial activity, surrounding residential catchments, and productive agricultural land, positioning it at the interface of urban and rural economies. Importantly, it is situated less than 5 km from the Cape Winelands Airport, which is earmarked for significant upgrades to international status, thereby enhancing future logistics and connectivity opportunities. Accessibility via Klipheuwel Road and Brass Avenue, together with adjacency to Durbanville's secondary CBD and nearby mixed-use nodes, reinforces its potential as a hub for employment-generating industrial activity aligned with metropolitan growth strategies.

Development Proposal

- Envisioned as a **multi-functional industrial park** with warehousing, workshops, offices, and container storage.
- Phased development aligned with market absorption and infrastructure delivery.
- Proposed GLA: **±58,263 m²**, including maxi-units, mini-units, and expansion areas.
- 217 parking bays planned, balanced against industrial and office demand.

Contextual Overview Summary

- **City of Cape Town MSDF (2023):** Supports industrial intensification, inclusive growth, and aviation-linked competitiveness.
- **Northern District Plan (2023):** Reinforces manufacturing-focused development in Fisantekraal, discourages large-scale storage/retail, and emphasizes floodline management and landscaping.
- Site designated as **Incremental Growth and Consolidation Area (IGCA)**, supporting intensification subject to infrastructure capacity.

The contextual overview of the Durbanville Mixed Industrial Development highlights the broader planning and policy environment shaping the site's potential. Guided by the City of Cape Town Metropolitan Spatial Development Framework (MSDF, 2023) and the Northern District Spatial Development Plan (2023), the area is earmarked for inclusive economic growth through industrial intensification within designated nodes. The MSDF emphasizes balancing urban expansion with protection of agricultural assets, while leveraging strategic infrastructure such as the planned upgrade of the Cape Winelands Airport, located less than 5 km from the site. At the district level, strong demand for industrial land is evident, with redevelopment and expansion in nodes like Kraaifontein, Brackenfell, and Fisantekraal. The site itself,

situated within an Incremental Growth and Consolidation Area, is specifically oriented toward manufacturing-focused development, discouraging large-scale storage or retail uses. Its position between high-income residential estates in Durbanville and inclusionary housing projects in Fisantekraal creates opportunities for employment-generating uses that serve a diverse socio-economic spectrum. Overall, the contextual overview confirms the site's alignment with metropolitan and district priorities, reinforcing its suitability for phased mixed industrial development that is both economically viable and socially inclusive.

Economic & Market Profile

- Site rating: **High**.
- Economic base: **Positive & compatible**.
- Labour profile: **Balanced & formal**, with emerging skilled workforce.
- Market potential: **Moderate to High**, supported by strong industrial demand in the Northern Sub-Region.

The economic and market profile of the proposed Durbanville Mixed Industrial Development reflects a strong alignment between local demand, labour capacity, and regional growth drivers. The site is rated high, with a positive and compatible economic base supported by established industrial clusters and proximity to logistics infrastructure such as the Cape Winelands Airport. The labour profile is balanced and formal, with an emerging skilled workforce and strong absorption potential, making the area labour-rich and supportive of industrial expansion. Socio-economic indicators point to moderate-to-high market potential, driven by population growth, income diversification, and increasing demand for warehousing and light manufacturing space. Importantly, the supply gap in industrial and distribution facilities within the Northern Sub-Region reinforces the strategic opportunity for a phased, mixed industrial park that can serve both Durbanville's higher-income markets and the inclusionary housing communities of Fisantekraal, thereby ensuring inclusive and sustainable economic growth.

Demand Analysis

- Northern Sub-Region demand:
 - ±147 ha warehousing
 - ±90 ha manufacturing
- Phased absorption projected through 2041, with incremental uptake of 4–17 ha per cycle.
- Identified **supply gap** in warehousing and distribution facilities.

The demand analysis for the Durbanville Mixed Industrial Development demonstrates a clear and growing need for industrial land in the Northern Sub-Region, particularly for warehousing, distribution, and light manufacturing activities. Market modelling indicates a projected demand of approximately 147 hectares for warehousing and 90 hectares for manufacturing, with phased absorption expected through 2041. Uptake is anticipated in incremental cycles of 4–17 hectares, reflecting steady but sustainable growth aligned with infrastructure delivery and market readiness. This demand trajectory is reinforced by strong regional economic drivers, including the planned upgrade of the Cape Winelands Airport, rising property values in nearby industrial nodes, and the expansion of residential catchments in Durbanville and Fisantekraal. The analysis identifies a supply gap in modern, flexible warehousing and distribution facilities, positioning the proposed development as a strategic response to both current and future industrial requirements. Overall, the demand profile underscores the viability of a phased mixed industrial park that can capture market opportunities while supporting inclusive employment and regional competitiveness.

Findings and Recommendations (for Amendment Report)

Key Findings:

- The site is strategically positioned to leverage **airport-linked logistics growth** and regional industrial clustering.
- Strong demand trajectory for **warehousing, distribution, and light manufacturing**, with a clear supply gap in the Northern Sub-Region.

- Labour market is supportive, with a mix of semi-skilled and skilled workers available locally.
- Socio-economic profile indicates potential for inclusive employment generation, serving both Durbanville and Fisantekraal communities.
- Environmental sensitivities (floodline, biodiversity) require mitigation through landscaping and stormwater management.

Recommendations:

1. Development Option:

- Proceed with a **Mixed Light Industrial / Warehousing / Distribution / Storage Park** as the optimal configuration.
- Ensure phasing aligns with projected absorption rates (4–17 ha increments).

2. Tenant Composition:

- Prioritize warehousing and logistics operators, supported by light manufacturing and ancillary office/workshop space.
- Limit retail and large-scale storage to secondary uses, in line with District Plan directives.

3. Infrastructure & Services:

- Coordinate with the City for bulk infrastructure provision, while ensuring internal linkages and stormwater retention ponds are developer-led.
- Integrate landscaping and floodline management into design to meet environmental and visual quality standards.

4. Strategic Positioning:

- Market the development as an **aviation-linked logistics hub**, leveraging proximity to Cape Winelands Airport.
- Position as a complementary node to Durbanville's secondary CBD and surrounding industrial clusters.

5. Socio-Economic Integration:

- Incorporate employment strategies that align with local labour absorption capacity.
- Support inclusive growth by balancing opportunities for skilled and semi-skilled workers.

Conclusion

The Durbanville Mixed Industrial Development Market Study (May 2026) confirms that the proposed site is optimally positioned for a phased Mixed Light Industrial / Warehousing / Distribution / Storage Park. Market demand analysis identifies a significant supply gap in warehousing and logistics facilities within the Northern Sub-Region, with phased absorption projected through 2041. The development will leverage proximity to the Cape Winelands Airport, regional industrial clustering, and a balanced labour profile to generate inclusive employment opportunities. Recommendations emphasize phased implementation, manufacturing-focused tenant composition, coordinated infrastructure provision, and environmental sensitivity measures to ensure sustainable and regulator-aligned growth.

2.3 Public Participation Process

In terms of Regulation 31 of the EIA Regulations, 2014 (as amended), the SAR must be subjected to a public participation process, which is agreed to by the competent authority, and which is appropriate to bring the proposed change to the attention of potential and registered interested and affected parties (I&APs), including organs of state, which have jurisdiction in respect of any aspect of the relevant activity, and the competent authority; and must reflect the incorporation of comments received, including any comments of the competent authority.

The PPP will be undertaken as per the requirements of the EIA Regulations 2014, as amended. Additionally, the PPP adheres to the DEA&DP's Guideline on Public Participation (March 2013).

Site Notice:

The Site Notice, providing information on the amendment application, will be erected on site, inviting members of the public to register as an Interested and Affected Party (I&AP).

Application for Substantive Amendment Application and Draft Substantive Amendment Report Notification:

Previously registered I&AP as well as Potential I&APs / key stakeholders will be given the opportunity to comment on this Draft Substantive Amendment Report (SAR) and the supporting documentation. The following parties will be notified of the Amendment Process and the availability of the Draft Substantive Amendment Report (SAR) and supporting documentation for review and comment:

- Previously registered I&APs
- Organs of State (as indicated in the section below);
- Local and District Municipalities;
- Adjacent landowners; and
- Ward Councillor of the area.

In addition to this:

- A newspaper advertisement will be published in the Tygerburger (distribution in Fisantekraal).
- The Draft SAR and supporting documentation will be made available for public viewing at the Fisantekraal Public Library (Cnr of Peter Mokaba Road, Dullah Omar Street, Fisantekraal, Cape Town, 7550) and on the EAP's website for review and comment.
- Previously Registered I&APs and Potential I&APs / key stakeholders were given the opportunity to review and comment on this Draft SAR for a period of 30 days.
- All written comments received on the Draft SAR will be recorded and responded to in a "Comments and Responses Report", which will be attached (along with the original comments received) to the Final SAR in and will be submitted to the DEA&DP for their decision-making (within the legislated timeframe).

Proof of compliance is available in Appendix I1 - 3.

3 PROJECT TEAM DETAILS

3.1 Environmental Assessment Practitioner Details

Legacy Environmental Management Consulting (Pty) Ltd. (Legacy EMC) has been appointed as the independent environmental assessment practitioner (EAP) to undertake the substantive amendment application.

Table 5: Details of the EAP and the relevant representatives

EAP	Legacy EMC
Company Registration No.:	2017/213820/07
Contact Person:	Ms Lauren Abrahams
Postal Address:	PO Box 12410, Die Boord, 7613
Telephone:	(021) 887 4000
Fax:	(021) 205 1966
Email:	info@legacyemc.co.za

The following table summarises the expertise of the main team member(s). Curriculum vitae of the team member(s) and relevant qualifications have been included in 5.

Table 6: EAP - Team Members

Lauren Abrahams	Project Manager and Compiler of Report
	Lauren Abrahams is an Environmental Consultant with experience in applying the principles of Integrated Environmental Management (IEM), and in applying the Environmental Impact Assessment Regulations to various development projects in South Africa. She has experience in various sectors including residential, commercial and industrial developments. Her core experience includes Project Management of environmental projects, including oversight through the tendering, design, and construction, operational and decommissioning phases. Lauren also has extensive experience in Permitting and/or Licencing in respect with Specific Environmental Management Acts (SEMA), Environmental Compliance Monitoring, and Water Use Licence Applications in terms of the National Water Act, to mention a few. In addition, Lauren has valuable knowledge and experience in Public Participation Processes.
Relevant Years of Experience	10 years
Qualifications	BTech (Oceanography), Cape Peninsular University of Technology, 2010. ND (Oceanography), Cape Peninsular University of Technology, 2009.
Professional Registration / Memberships	Registered EAP EAPASA (2019/656) Pri. Nat. Sci. SACNASP (007592) Member: International Association for Impact Assessment South Africa (
Role in Project	Project Management and Report Preparation

Kim Pontac	Internal Review
	As the Managing Director of Legacy EMC and Principal Environmental Consultant, Kim has many years' experience in applying the principles of Integrated Environmental Management (IEM) and the Environmental Impact Assessment Regulations to several development projects and initiatives in southern Africa and abroad. She has worked in various sectors, which include transport, utilities, social infrastructure and minerals, metals and chemicals, hydrocarbons, and nuclear industries. Kim has co-ordinated and managed numerous environmental processes within the public and private sectors for national and international companies. As Principal Consultant, she has successfully conducted a variety of environmental investigations and evaluations for green and brownfield projects. Her core experience includes IEM and guiding projects through tendering, design, construction, operational and decommissioning phases. Kim also has experience in environmental and social due diligence (in accordance with IFC Standards and Equator Principles), environmental compliance audits and environmental legal reviews, permitting and/ or licencing, facilitation and training, and environmental construction monitoring.
Relevant Years of Experience	12+ years
Qualifications	LLM (Environmental Law), University of Cape Town, 2017; BTech (Environmental Management), Cape Peninsula University of Technology, 2008; National Diploma (Oceanography), Cape Peninsula University of Technology, 2004.
Professional Registration / Memberships	SACNASP Professional Natural Scientist (Environmental Science) (No: 117908); Institute of Waste Management of Southern Africa (IWMSA) Member No.: 30118035; International Association for Impact Assessment South Africa; Member: Environmental Law Association; Registered EAP with the Environmental Assessment Practitioners Association of South Africa (EAPASA) (2019/1269).
Role in Project	Internal Review

3.2 Competent Authority Details

The Department of Environmental Affairs and Development Planning (DEA&DP): Development Management Directorate is the licensing authority for this application.

The contact details of the case officer at DEA&DP are provided below 6.

Table 7: Details of the Licensing Authority

Department	DEADP: Development Management Directorate: Region 1
Contact Person:	Ms Rondine Isaacs
Physical Address:	6 th Floor Utilitas Building, 1 Dorp Street, Cape Town, 8000
Email (Competent Authority):	DEADPEIAadmin@westerncape.gov.za
Email (case officer):	Rondine.Isaacs@westerncape.gov.za

3.3 Assumptions and Limitations

The following assumptions and limitations apply to this Report:

- Where information supplied by the Holder of the EA or specialist consultant(s), has been used, it has been assumed that the information is correct unless otherwise stated. No responsibility is accepted by Legacy EMC for incomplete or inaccurate data supplied by external parties;
- It is Legacy EMCs professional opinion that the adopted predictive methods are sufficient and adequate for rating the significance of the impacts during the Impact Assessment;
- Legacy EMCs assessment of the significance of impacts of the proposed project on the receiving environment has assumed that the activities will be confined to the area as described in Section 1.1. If there are any substantial changes to the description of proposed activity, impacts may need to be reassessed;
- Where detailed information is not available, the precautionary principle, i.e., a conservative approach that overstates negative impacts and understates benefits, has been adopted;
- It is assumed that the public participation process (PPP) undertaken during this substantive amendment process has identified all relevant concerns of stakeholders;
- Limitations and uncertainties within the various techniques adopted by the specialists, where relevant, are referred to in the specialist studies. (as may be required and where specialist input was deemed necessary)
- The Holder of the EA will in good faith implement the agreed mitigation measures identified in this Report and in the EMPr. In this regard, it is assumed that the Holder of the EA will commit enough resources and employ suitably qualified and experienced personnel;
- Notwithstanding the above, Legacy EMC is confident that these assumptions and limitations do not compromise the overall findings of this Report.

4 IMPACT ASSESSMENT

The purpose of this section is to describe the potential negative and positive impacts associated with the proposed amendment to the approved development, as well as the recommended mitigation measures required to manage these impacts effectively. The proposed changes represent a material shift in the scope of the existing Environmental Authorisation (EA) and its associated Environmental Management Programme (EMPr), necessitated by the transition from a mono-functional storage facility to a diversified general industrial estate. This shift introduces new land uses, infrastructure demands, and operational activities that require updated environmental controls and planning responses. The subsections below outline the key areas of change and assess their implications for environmental integrity, infrastructure capacity, and regulatory compliance.

The Impact Assessment Methodology is provided in **Appendix H**.

Summary of impacts associated with the proposed amendments:

- **Original Scope:** The EA was granted for a mono-functional development comprising ±6,100 double-storey storage units.
- **Proposed Amendment:** Expansion to general industrial use, including warehousing, workshops, offices, and pre-cooling facilities.
- **Impact:** This constitutes a material change in the nature and intensity of land use, which directly affects environmental impacts, traffic volumes, and service demands. These impacts are further investigated / discussed below:
 - Impact on Freshwater Resources as a result of the change in SDP
 - Traffic impacts
 - Service demands
 - Stormwater impacts
 - Socio-economic impacts

4.1 Impact on Freshwater Resources as a result of the SDP amendments

Description:

During the site assessment undertaken in December 2015 by BlueScience (2016), an unnamed tributary of the Mosselbank River was identified bisecting the study area (Figure 4). As part of the ecological assessment, it was determined that the ecological condition of the tributary was moderately to largely modified [Present Ecological State (PES) Category C/D], whilst the riparian habitat was determined to be in a critically modified state (PES E/F). The ecological importance and sensitivity of the tributary was determined to be moderate for this system, however subsequent to further assessment this system was determined to have a high ecological importance and sensitivity (Appendix D of **Appendix C5**).

Classification of the freshwater ecosystems associated with the proposed development was undertaken at Levels 1 - 4 of the Classification System (Ollis et al., 2013) as outlined in Appendix C. A detailed explanation of the methods of assessment undertaken is provided in Appendix C of this memorandum.

As part of this investigation, additional assessments were conducted for the UCVB wetland located downgradient of the proposed development as this system would likely be impacted by the proposed development as well (Appendix D). It was determined that the ecological condition of the UCVB wetland is moderately to largely modified (PES Category C/D) and the ecological importance and sensitivity of the system was determined to be high. The ecoservice provision of the systems was determined to be very low for cultural services and high for provisioning services, specifically water for human use. The UCVB wetland provides further regulating and supporting services such as phosphate and nitrate assimilation. The modified ecological condition of the systems is as a result of catchment land changes, specifically historic and ongoing agricultural practices altering the hydrological regime, geomorphological processes and vegetation composition of these systems, as well as the expansion of the Fisantekraal Industrial Area to the north of the study area.

A 30 m conservation buffer was determined by BlueScience (2016) in accordance with the City of Cape Town's Floodplain and River Corridor Management Policy (2009) for the unnamed tributary of the Mosselbank River; this buffer is anticipated to suitably protect the system from the proposed development (BlueScience, 2016). This buffer was also applied to the UCVB wetland identified within the investigation area. The conservation buffer and applicable legislative zones of regulation (ZoR) as it relates to the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and Government Notice (GN) 4167 as it relates to the National Water Act, 1998 (Act No. 36 of 1998) (NWA) are illustrated visually in Figure 5 and Figure 6 below.

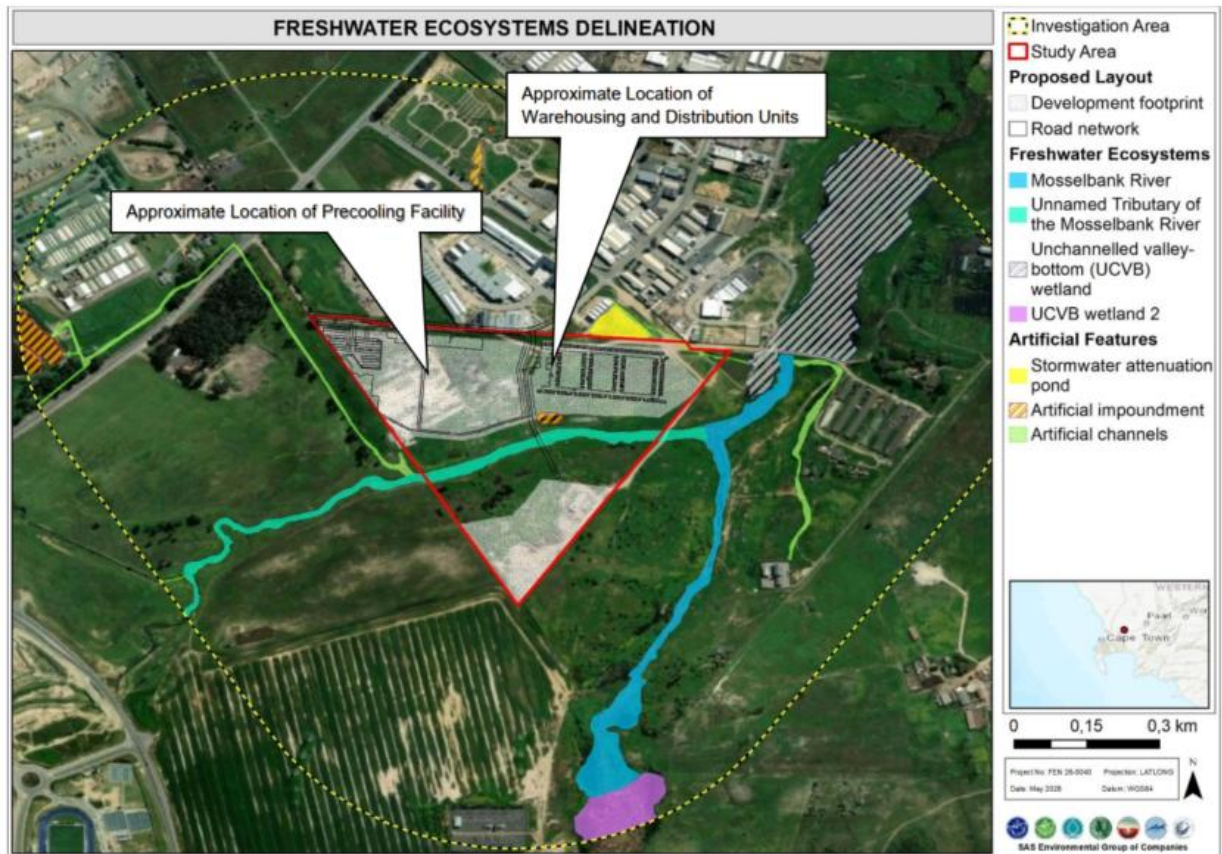


Figure 9: Delineation of the field verified freshwater ecosystems and artificial features associated with the study and investigation areas. Please

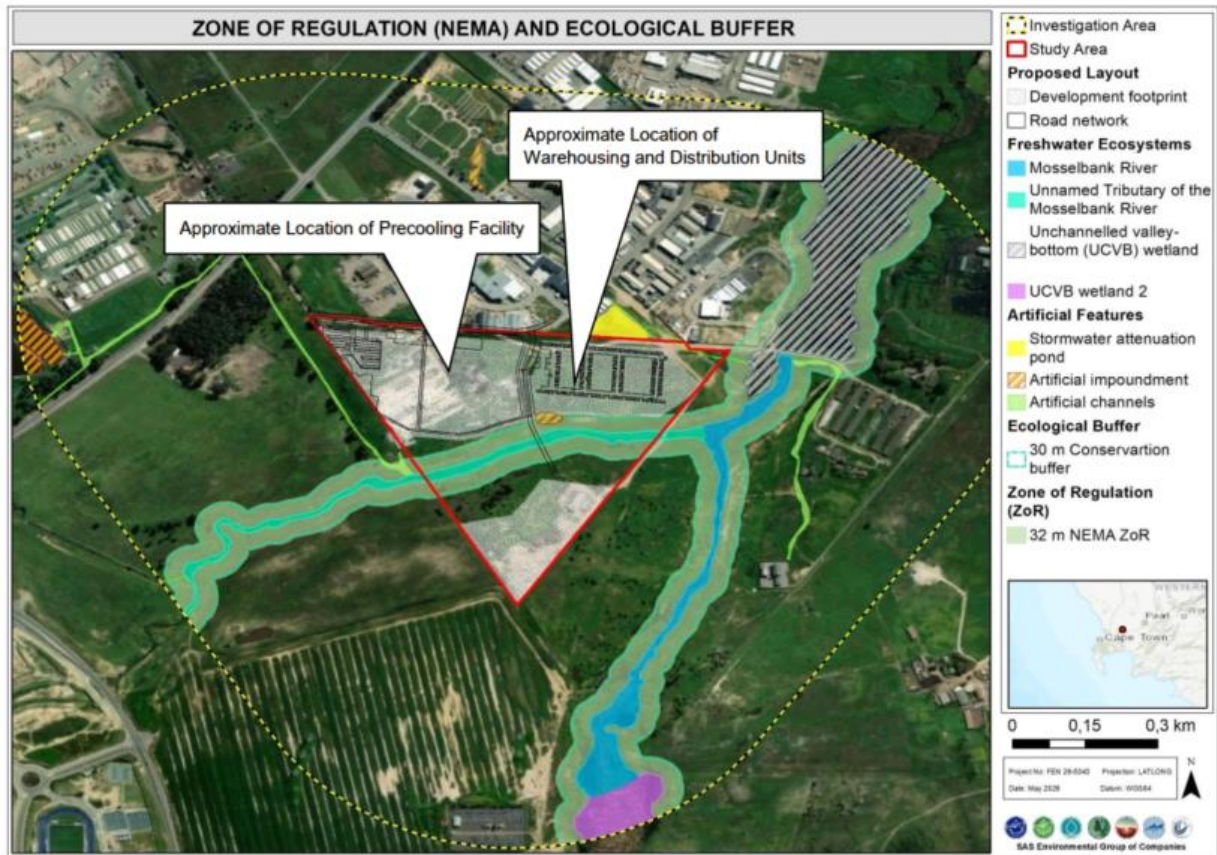


Figure 10: The NEMA zone of regulation and ecological buffer associated with the study and investigation areas. Please see Figure 3 for the for the updated stormwater pond layout.

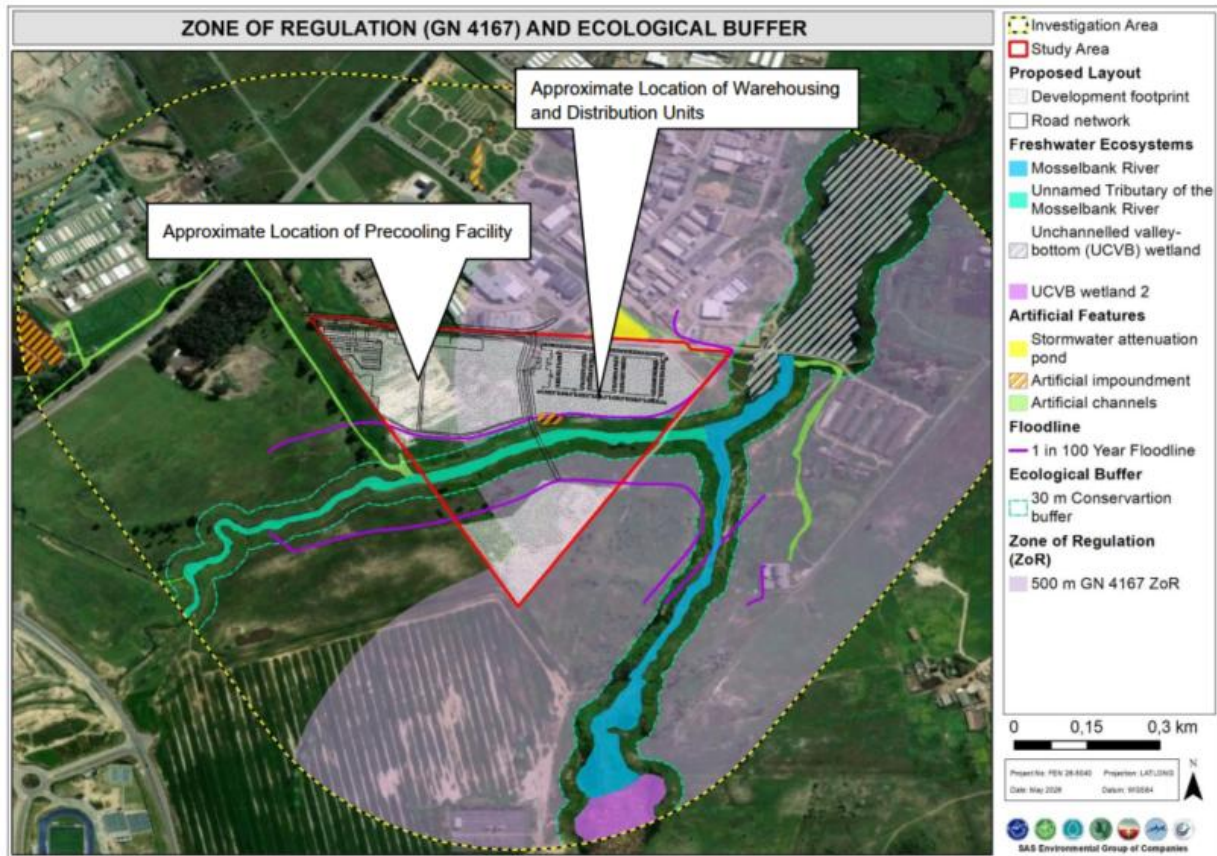


Figure 11: The GN 4167 (NWA) zone of regulation and ecological buffer associated with the study and investigation areas. Please see Figure 3 for the updated stormwater pond layout.

Assessment of impacts:

Following the completion of the assessment, the Department of Water and Sanitation (DWS) Risk Assessment Matrix (2023) was conducted (refer to Appendix E for the method of approach) and recommendations were developed to address and mitigate any potential negative ecological impacts associated with the project. These recommendations also include general management measures, which apply to the proposed construction and operational activities. Control measures have been developed to address issues in all phases throughout the life of the project including construction and operation.

The DWS RAM (2023) indicated that an overall 'Low' risk significance to the integrity of the freshwater ecosystems is expected, with a "Moderate" risk significance to the integrity of the unnamed tributary of the Mosselbank River, due to the proposed upgrade of the road bisecting the tributary, as well as the construction and operation of stormwater infrastructure within the study area which will release stormwater into the downgradient freshwater ecosystems (Appendix F). The demolition activities are anticipated to pose a "Low" risk significance to the freshwater ecosystems assuming that the rubble will not be discarded within the tributary or the 30 m conservation buffer and will be disposed of at a licenced waste processing facility on completion of all demolition activities. Construction rubble may however be used on site as part of the road construction (infill) should the developer so desire (where feasible). A routine monitoring and maintenance plan must be compiled and implemented to manage stormwater infrastructure associated with the proposed development, including maintenance of the retention ponds, pipelines and stormwater attenuation system in terms of the integrity of the structures, damage control (including erosion), and the removal of litter, rubble, sediment and weeds, as outlined in the Stormwater Management Plan (SWMP) (Peter Wium Consulting Engineer, 2025).

Impact Significance:

Following the application of the Department of Water and Sanitation (DWS) Risk Assessment Matrix (2023), the ecological risks associated with the proposed development were evaluated and found to be **manageable with appropriate mitigation**. The key findings are:

Overall Freshwater Ecosystem Integrity

- **Risk Level: Low**
- **Reason:** The majority of construction and operational activities are located outside sensitive areas, and mitigation measures are in place to prevent significant ecological degradation.

Unnamed Tributary of the Mosselbank River

- **Risk Level: Moderate**
- **Reason:**
 - Proposed **road upgrade** bisecting the tributary.
 - **Stormwater infrastructure** will discharge into downgradient freshwater systems.
- **Mitigation:**
- Implementation of a **Stormwater Management Plan (SWMP)**.
- Routine **monitoring and maintenance** of retention ponds, pipelines, and attenuation systems.
- Erosion control and removal of litter, sediment, and invasive species.

Demolition Activities

- **Risk Level: Low**
- **Assumptions:**
- Rubble will be **disposed of at a licensed facility**.
- No dumping within the **30 m conservation buffer** or tributary.
- **On-site reuse** of rubble for road infill is acceptable where feasible

EMPr Implications:

The EMPr must be updated to include:

The following control measures must be implemented, along with the control measures stipulated in the associated freshwater report (BlueScience, 2016):

- Construction of the proposed development must preferably be undertaken during the dry summer period to minimise the volumes of sediment entering the freshwater ecosystems and to minimise water quality impacts;
- Sediment traps must be installed downgradient of the construction works prior to the commencement of construction, to prevent excess sediment from entering the freshwater ecosystems. Sediment traps are to be inspected daily and accumulated sediment to be removed by hand on a weekly basis;
- Soil removed from the construction area must not be stockpiled within the 30 m conservation buffer and exposed soil must be protected for the duration of the construction phase with a suitable geotextile (e.g. Geojute or hessian sheeting) to prevent erosion and sedimentation of the river. Mixture of the lower and upper layers of the excavated soil should be kept to a minimum, so as for later usage as backfill material or as part of rehabilitation activities, and the stockpiles may not exceed 2 m in height;

- Suitable dust management practices must be implemented for the duration of construction and the National Dust Control Regulations, GN 827 of 2013, should be complied with at all times;
- In all events all machinery and vehicles used during construction must be maintained and equipped with drip trays to prevent oil, petrol or diesel leaks. If breakdowns occur these vehicles must be towed offsite to the designated areas/workshops. An emergency spill plan must also be established and implemented for the operation of the proposed workshop. The proposed control measures will ensure that incidental oil spills and leakage are minimised onsite and thus limit any opportunities of water contamination and water quality deterioration;
- The proposed parking areas and internal road network must incorporate permeable paving or Permeable Interlocking Concrete Pavement (PICP) as a SuDS for the proposed development;
- In the context of the SWMP, compiled by Peter Wium Consulting Engineer (2025), applying the principles of SuDS must be implemented for the proposed development to allow for subsurface infiltration of stormwater, minimising the amount of surface runoff and the associated contribution to flood peaks of the Mosselbank River and its associated UCVB wetland;
- Proliferation of Alien and Invasive Plant species (AIPs) as a result of the construction and operation related disturbances must be monitored and controlled;
- Moderate rehabilitation of the disturbed areas must be undertaken, including removal of existing rubble and building material, control of opportunistic *Phragmites australis* and re-vegetation exclusively with indigenous vegetation to increase biodiversity of the freshwater ecosystems, inclusive of the 30 m conservation buffer that might have been impacted by the construction of the proposed development and road upgrade, thus contributing to improvement the PES of these systems;
- Following rehabilitation activities, a suitable Alien Invasive Management Plan (AIMP) must be implemented to ensure that AIPs do not become established within the areas disturbed by construction activities; and
- General good housekeeping practices must be implemented during all phases of the proposed residential development, to ensure limited direct, indirect and cumulative impacts to the receiving freshwater environment.

As part of the development and operation of the stormwater ponds, the following control measures must be implemented specifically:

- Stormwater ponds must be vegetated with indigenous obligate and facultative hydrophytes suitable for seasonal saturation. This will assist with energy dissipation and prevent sedimentation and erosion as well as improve habitat provision;
- Cobbles must be placed on the concrete aprons to further assist with energy dissipation;
- All materials used to construct the stormwater ponds should not generate toxic leachates or lead to significant changes in pH or dissolved salt concentrations; especially considering that outflow of the pond drains into the unnamed tributary of the Mosselbank River;
- No plastic lining may be used as part of the stormwater ponds' construction as this has various ecological impacts, with special mention of impacts to faunal assemblages;
- Rocks must be placed at any outlet pipes (downgradient of the stormwater ponds), as required and indigenous vegetation established to bind the soil of the bed and to prevent erosion. This will also promote diffuse flow and decrease the velocity of water released downgradient towards the unnamed tributary of the Mosselbank River and the UCVB wetland;
- The operation of the stormwater management system must ensure that stormwater is released into the unnamed tributary of the Mosselbank River in an attenuated manner to mimic natural flow velocities as far as feasibly possible; and
- Regular inspection of the stormwater management system and associated landscaped areas must be undertaken (specifically after large storm events) in order to monitor the occurrence of erosion, particularly of the landscaped areas surrounding the stormwater attenuation system. If erosion has occurred, it must immediately be rehabilitated through stabilisation of the embankments and revegetation with indigenous vegetation.

In conclusion, considering that significant effort has been made to avoid direct impacts on freshwater ecosystems, particularly with regards to the unnamed tributary of the Mosselbank River and the 30 m

conservation buffer, it is the opinion of the freshwater specialist that the development may proceed. The proposed new development layout is considered acceptable from a freshwater ecological and resources management perspective.

4.2 Traffic Impact

Description:

- The trip generation for the previously approved development was estimated at 162 trips during the AM peak hour and 105 trips during the PM peak hour. The revised trip generation for the current proposal is 398 trips during the AM peak hour and 398 trips during the PM peak hour which is an increase of 236 and 293 trips in the AM and PM peak hours respectively.
- There are an additional 233 trips (163 IN and 70 OUT in AM peak hour and 58 IN and 175 OUT in the PM peak hour) from an adjacent erf (Phase 4 of Erf 1991) that will access the external road network via a servitude right of way across this development.
- ITS have carried out a TIA for the adjacent development of Erf 1991 and RE/5/724. The TIA made recommendations towards road improvements required for existing traffic conditions and for 2029 conditions with background growth and the full development of Erf 1991 and RE/5/724.
- ITS were then requested to carry out a new TIA to include the additional rights for this application, i.e. the development of Erven 1992, 1993 & 1997, Erf 1995; and Erf 2006.

Potential Impacts:

- **Traffic:** Increased traffic is expected as a result of the increase in the total number of trips expected to be generated by the proposed development. To mitigate the overall impact significance it is critical that the mitigation measures as set out in the TIA, 2025 be implemented.

Impact Significance:

- **Neutral** through the implementation of mitigations measures set out in the TIA, 2025.

EMPr Implications:

Must be updated to include:

Based on the findings and conclusions of this study it is recommended that:

- The Amended Development Application for Erven 1992, 1993 & 1997, Erf 1995 and Erf 2006 be supported in terms of traffic impact provided that the road improvements (as listed) are implemented with available DCs from this and other developments in the immediate area.
- The Developer and the City enter into a Service Level Agreement to allocate and utilise the available DCs from this development for Road improvements as determined and prioritised by the City taking into account the timing of this and other developments that will generate DCs in the immediate area.
- The SDP for the consolidation of Erven 1992, 1993 & 1997 be approved in terms of access, parking and circulation including a lower rate of 0.5 bays/100 m² for the precooling facility. This results in a reduction of 80 bays. The area that would have been used to accommodate 80 bays (as shown of the SDP) will be utilised as an additional staging area.
- The SDP for Erf 2006 be approved in terms of access, parking and circulation.
- In future a SDP must be submitted for Erf 1995 once details for this development are finalised.

Refer to Section 2.2.2 of the Draft SAR as well as the TIA in Appendix C4.

Conclusion:

Based on the findings of this assessment, it can be concluded that the impact of the proposed development could be sufficiently mitigated, provided that the upgrades as recommended in this report are in place. Hence, it is recommended that this development be considered for approval from a transport perspective.

4.3 Service Demands

Description:

A comparison of the service demands is set out in the table hereunder:

Table 8: Service demands

Service Demand	Original Approved EA	Proposed Amendment
Water supply	The demand for potable water for the proposed development is estimated at 1,2 kl/day	The demand for potable water for the proposed development is estimated at 258 kl/day
Sewerage	Sewage run-off from the proposed development is estimated at 1,2 kl/day	Sewage flow from the proposed development is estimated at 232 kl/day
Solid Waste	Solid waste generated by the development is estimated at 63 kg/week	Solid waste generated by the development is estimated at 1,75 ton/day

Potential Impacts:

- **Strain on municipal infrastructure:** Although the demand for the proposed amendment is significantly higher than the original approved EA. The Municipality has confirmed that there is available capacity to provide for the demand.

Furthermore, the higher demand will required additional infrastructure investment from the Proponent to strengthen municipal infrastructure to meet the required demand. The proposed infrastructure as set out in Section 2.2.2 of the SAR will not trigger any additional listed activities.

Impact Significance:

The proposed amendment significantly increases service demands across water, sewerage, and waste. While this introduces infrastructure and environmental risks, it also presents opportunities for system upgrades, economic growth, and improved service delivery—provided that mitigation measures and planning are effectively implemented.

As concluded in the Engineering Services Report “*it is concluded that the required basic civil engineering services, i.e. potable water, sewerage and solid waste removal, for the proposed cold storage and light industrial developments on Erven 1992, 1993, 1995 and 2006 in the Fisantekraal area of Durbanville, can be accommodated by the City of Cape Town in their existing bulk infrastructure, alternatively in the bulk infrastructure items as per the master plans.*”

EMPr Implications:

- Updated to reflect the description changes.

4.4 Stormwater Impacts

Description:

Refer to the description in 2.2.4 of this report or for a more detailed explanation refer to the SWMP in Appendix C2.

Potential Impacts:

- **Hydrological benefit:** Improved stormwater conveyance, reduced flooding and uncontrolled runoff.

The previously approved amendments assessment identified stormwater management measures to mitigate potential flooding and uncontrolled runoff. The current amendment enhances these measures by improving stormwater conveyance, reducing the risk of localised flooding and uncontrolled discharges. While this represents a positive refinement, it is not of such magnitude as to alter the overall impact determination.

- **Engineering benefit:** Enhanced resilience and protection of internal infrastructure.

The previously approved amendments assessment anticipated the provision of standard internal services infrastructure. The current amendment strengthens this by enhancing resilience and protection of internal infrastructure against stormwater-related risks. This constitutes a positive engineering benefit but does not change the overall impact determination.

Impact Significance:

- **Positive environmental impact** through improved stormwater management.

EMPr Implications:

Must be updated to include:

- **Maintenance requirements for Stormwater Infrastructure:**
 - A Stormwater Maintenance Plan for each of the structures must be implemented to ensure the long-term functionality of the system as a whole. These maintenance plans shall be implemented by the Owner of the development initially, ceded to a future Property Owner Association. In general maintenance consists of:
 - Maintaining regular inspections of the outflow manholes
 - Maintaining regular visual inspections of the stormwater control structure and its performance (drainage time)
 - Vegetation must not become overgrown, especially invasive species, which might impeded emergency overflow paths in extreme storm events.
 - Refer Annexure N, of the **SWMP in Appendix C2 of the Draft SAR** for typical Maintenance Schedules for the proposed BMP Control Structures.
 - A Landscape Master Plan has been completed for Ptn 32 of Farm 168 and is attached as **Annexure M of the SWMP and Appendix C3 of the Draft SAR**. It sets the vegetation recommendations and requirements for the entire site and in particular, it takes into

account the vegetation types required per the City's Landscape and Indigenous Plant Species Guidelines for SUDS structures.

- Strengthened provisions for erosion and sediment control during construction.

4.5 Socio-Economic Impacts

Description:

The previously approved development (2016/2021) was limited to high-density storage units, offering minimal employment opportunities and limited socio-economic integration. In contrast, the current amendment proposes a **mixed light industrial, warehousing, distribution, and logistics park**, which is far more employment-generating and strategically aligned with regional growth drivers. The new configuration leverages proximity to the Cape Winelands Airport, Durbanville's secondary CBD, and Fisantekraal's inclusionary housing projects, positioning the site as a hub for industrial diversification, logistics competitiveness, and inclusive labour absorption.

Potential Impacts:

- **Employment Creation:**
 - *Previous approval:* Minimal operational employment due to storage-only land use.
 - *Current amendment:* Significant direct and indirect jobs in warehousing, logistics, light manufacturing, and support services.
- **Skills Development:**
 - *Previous approval:* Limited scope for skills transfer or training.
 - *Current amendment:* Opportunities for semi-skilled labour absorption, complemented by demand for skilled technical and managerial roles.
- **Economic Diversification:**
 - *Previous approval:* Narrow economic contribution, primarily passive storage.
 - *Current amendment:* Active industrial diversification, strengthening Durbanville's role as a secondary CBD and expanding Fisantekraal's industrial base.
- **Social Integration:**
 - *Previous approval:* Minimal integration with surrounding communities.
 - *Current amendment:* Employment opportunities for inclusionary housing communities in Fisantekraal, reducing socio-economic disparities.
- **Secondary Benefits:**
 - *Previous approval:* Limited multiplier effects.
 - *Current amendment:* Stimulates local services, transport, and small business support industries.
- **Potential Risks:**

- Increased traffic volumes and pressure on bulk infrastructure, requiring phased service provision and traffic management.
- Land use conflicts if retail or non-industrial activities dominate, mitigated by adherence to district plan directives.

Impact Significance:

- *Previous approval:* Low socio-economic significance, given limited employment and narrow economic contribution.
- *Current amendment:* **Moderate to high positive significance**, due to strong market demand, inclusive employment potential, and alignment with metropolitan and district growth strategies. Risks are manageable with phased infrastructure planning and industrial-focused land use controls.

EMPr Implications:

The EMPr already covers the following EMPr requirements as such no updates to the EMPr is required.

- **Employment & Skills:** Incorporate commitments to local labour absorption, training, and skills development programs.
- **Infrastructure Management:** Phase development in line with bulk service capacity; implement traffic management measures.
- **Community Integration:** Monitor employment uptake from surrounding communities, particularly Fisantekraal.
- **Environmental & Social Safeguards:** Continue floodline management, landscaping, and biodiversity protection to balance socio-economic benefits with sustainability.
- **Compliance Monitoring:** Include socio-economic indicators (employment numbers, local procurement, skills training) in EMPr reporting to demonstrate ongoing contribution to inclusive growth.

Conclusion

The amendment represents a substantial improvement in socio-economic outcomes compared to the previously approved storage-unit model. While the earlier approval offered limited employment and economic integration, the current proposal introduces a diversified industrial hub that will generate jobs, support skills development, and strengthen regional competitiveness. With appropriate infrastructure planning, environmental safeguards, and EMPr monitoring, the socio-economic benefits of the amended development are expected to significantly outweigh potential risks, positioning the project as a strategically aligned and regulator-ready industrial node.

5 CONCLUSIONS AND RECOMMENDATIONS

The overall assessment of the impacts resulting from the proposed amendment is summarised as follows:

- The amendments **do not introduce new listed activities** under NEMA but require targeted updates to the EMPr.
- Impacts are either **neutral with mitigation** (buffer encroachment), or **positive**.

The proposed amendments are environmentally acceptable, provided that the updated EMPr is implemented. They will overall reduce environmental pressures, enhance infrastructure resilience, and improve integration with surrounding land uses.

5.1 EAPs Professional Opinion

It is the opinion of **Legacy Environmental Management Consulting (Pty) Ltd. (Legacy EMC)** that the proposed amendments to the Industrial Development will not result in significantly increased environmental or socio-economic impacts beyond those already assessed as part of the authorised development.

This conclusion is based on the following considerations:

1. Alignment with Zoning and Market Demand

- The property is zoned for General Industry I, which permits a broader range of industrial activities.
- The original EA limited the development to storage units only, which restricts the site's economic potential.
- The amendment seeks to align the approved land use with the zoning and respond to market demand for diverse industrial operations such as warehousing, logistics, light manufacturing, and office space.

2. Economic and Employment Benefits

- General industrial use will attract a wider variety of tenants and businesses.
- This will result in greater job creation, both during construction and operational phases.
- The diversified industrial estate will contribute more meaningfully to the local economy than a mono-functional storage facility.

3. Optimized Land Use and Infrastructure

- The revised Site Development Plan (SDP) introduces a phased layout with tailored footprints for workshops, warehouses, and offices.
 - This allows for more efficient use of the site, better circulation, and improved integration of supporting infrastructure (stormwater, sewage, traffic).
 - The amendment ensures that infrastructure is scaled appropriately for industrial use, improving long-term sustainability.
-

4. Environmental Safeguards Remain Intact

- The amendment does not alter the environmental buffers or floodline protections approved in the original EA.
- Areas within the 1:100 year floodline and 30m river buffer will still be rezoned to Open Space 3 (Special Open Space) and remain undeveloped.
- Stormwater and sewage systems will be upgraded to meet the City of Cape Town's Sustainable Urban Drainage Systems (SUDS) policy and industrial effluent standards.

5. Improved Traffic and Access Planning

- The revised layout accommodates heavier vehicle movements associated with industrial operations.
- Access points, road geometry, and parking provisions have been updated to support safe and efficient circulation.

The proposed amendment is driven by a strategic need to unlock the full development potential of the site in alignment with its zoning, market demand, and infrastructure capacity. By transitioning from a storage-only model to a diversified general industrial estate, the project will deliver enhanced economic value, greater employment opportunities, and long-term sustainability—while maintaining all environmental safeguards and regulatory commitments set out in the original Environmental Authorisation.

Accordingly, the proposed amendments are considered **environmentally acceptable**, subject to the incorporation of the updated mitigation measures into the Environmental Management Programme (EMPr).

In conclusion, Legacy EMC is of the opinion that the proposed amendments should be **granted**, including the amendments to the EMPr.

5.2 Way Forward

All written comments received on the Draft SAR will be responded to in a Comments-Responses Report (CRR) and, where relevant, incorporated into this Final SAR which will be submitted to DEA&DP for a decision on whether to grant or refuse the proposed amendments.

DECLARATION OF THE APPLICANT

I,

 ID Number:

in my personal capacity or duly authorised thereto hereby declare/affirm that:

- the information provided or to be provided as part of this Application form, is true and correct;
 - 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, as defined in Chapter 5 of NEMA (as amended) and any relevant Specific Environmental Management Acts and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
 - I am aware that 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 am aware of my general duty of care in terms of Section 28 of the NEMA;
 - I appointed the Environmental Assessment Practitioner ("EAP") which:
 - meets the requirements of the Section 24H Registration Authority Regulations, 2016, promulgated in terms of NEMA;
 - meets all the requirements in terms of Regulation 13 of the EIA Regulations, 2014;
 - ~~◦ meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the EIA Regulations, 2014;~~
- I will provide the EAP and 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 EIA Regulations, 2014 and other environmental legislation including but not limited to –
 - costs incurred for the appointment of the EAP or any person contracted by the EAP;
 - costs in respect of any fee prescribed by the Minister or MEC in respect of the EIA Regulations, 2014;
 - costs in respect of specialist reviews; and
 - the provision of security to ensure compliance with applicable management and mitigation measures; and
- 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 the Applicant or EAP is responsible in terms of the EIA Regulations, 2014 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.

Signature of the Applicant:

Date:

Pinetop Estate (Pty) Ltd

Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER (“EAP”)

I Lauren Abrahams EAPASA Registration number 2019/656 as the appointed EAP hereby declare/affirm the correctness of the:

- Information provided in this report and any other documents/reports submitted in support of this report (subject to the disclaimer in this report);
- 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;

25 May 2026



Signature of the EAP:

Date:

Legacy Environmental Management Consulting (Pty) Ltd.

Name of company (if applicable):
