

APPENDIX 29C

COMMENTS & RESPONSE REPORT (IN-PROCESS EIA PHASE)

Interested and Affected Parties Comments & Responses

No.	Name & Presenting unit	Issue/ Concern	Response
Environmental Impact Assessment Report (DEA&DP Ref: 16/3/3/2/A5/20/2046/24; DWS Ref No: WU33620) [30 day commenting period commencing on 13 November 2024 and up to and inclusive of 13 December 2024]			
266	DEADP EIA Admin	Email dated 13 November 2024 [In response to IAP notification email]: 1. The Directorate acknowledges the receipt of your correspondence.	1. This comment is noted.
267	Roxanne Moses - Subcouncil Manager 3 (Ward 4, 55, 56, 104 & 113)	Email dated 13 November 2024 [Internal Email]: 1. Good Day Lorraine and Chairperson, The attached is for your attention.	1. The EAP notes this communication.
268	DEADP EIA Admin	Email dated 13 November 2024 [In response to State Department notification email]: 1. The Directorate acknowledges the receipt of your correspondence.	1. This comment is noted.
269 & 319	Loretta Williams - Fisantekraal Centre for Development	Email dated 13 November 2024: 1. I would like to enquire whether interested parties have to register or RSVP to attend the open day on 20 November, and how to go about it. Thank you for your kind assistance.	Email response provided 13 November 2024: 1. Thank you for the email. There is no need to register or RSVP for the open day. Registration will be at the venue on the open day.
		Email reply dated 13 November 2024: 2. Many thanks for your swift response. Have a lovely day.	
		Email dated 6 December 2024:	Email response provided 6 December 2024:

		<p>1. Greetings from Fisantekraal Centre for Development. We trust that you are well.</p> <p>I am writing to you to ask if you could put me in touch with Deidre, the lady who will be involved with recruitment for, and job placement at the Cape Winelands Airport please? She was very keen to connect with us, as we do skills development training of unemployed people in Fisantekraal, and we would like to secure a meeting with her as early as possible in the new year.</p> <p>I look forward to your kind response.</p> <p>Email reply dated 6 December 2024:</p> <p>2. Thanks very much! I will email Deidre directly . Have a lovely weekend!</p>	<p>1. Thank you for the email. I have copied Deidre into this communication so that you can connect.</p>
270	Lourens de Bruyn	<p>Email dated 13 November 2024:</p> <p>1. Is this relevant only to the water application or does this address the airspace issues as well?</p> <p>Email reply dated 13 November 2024:</p> <p>2. I asked if the Public participation process and open day is relevant to all aspects of the project.</p> <p>In reply I am referred to a long list of documents.</p> <p>None of these documents answers my original question.</p> <p>And none of them seems to address the issue of fire hazard to farms and the workings of fire control by sir on the surrounding farms either.</p>	<p>Email response provided 13 November 2024:</p> <p>1. Please refer to the draft EIA report and supporting documents at download link https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/.</p> <p>You will also find additional airspace studies (Appendices 16 to 23).</p> <p>The Water Use licence (Appendix 31) application process is run concurrent with the EIA process due to the NEMA One Environmental System Application requirement.</p> <p>Email response provided 13 November 2024:</p> <p>2. The public participation process and open day is relevant to all aspects of the project.</p> <p>Please refer to Appendix 43B for more detail on fire management.</p>

		<p>It find it extremely alarming that it is impossible to get an answer out of the managers of this project.</p> <p>Please just answer my original question or out me in contact with someone who can.</p> <p>Email reply dated 15 November 2024:</p> <p>3. You are consistently referring me to documentation that contains no information to what I am asking about.</p> <p>How do I lodge a request for information or get in contact with someone who actually is qualified to reply?</p> <p>Email reply dated 2 December 2024:</p> <p>4. Since you insist on bullet points, here are my original questions once again:</p> <p>4.1. What is the proposed flight path for landings and departures? Which towns will have aircraft overhead due to this development?</p>	<p>Email response provided 15 November 2024:</p> <p>3. We seem to be talking past each other, and I would really like to assist you.</p> <p>Please list your request for information in point form.</p> <p>If I am unable to assist, I will obtain input from other parties within the team.</p> <p>I am the point of contact for the proposed project EIA and WULA process.</p> <p>Email response provided 9 December 2024:</p> <p>4. Thank you for the email. I have circulated your queries to the technical team. Attached please find responses to your queries. Further supplementation of responses may be included in the Comments and Responses report, and this will be circulated to IAPs during the next public consultation period in early 2025.</p> <p><u>Responses provided:</u></p> <p>4.1. What is the proposed flight path for landings and departures? Which towns will have aircraft overhead due to this development? Proposed Flight Path for Landings and Departures at CWA:</p> <ul style="list-style-type: none"> • The flight paths will be carefully designed to minimise noise and environmental impacts on surrounding areas. • Routes are still being developed, with input from the Air Traffic and Navigation Services (ATNS), South African Civil Aviation Authority (SACAA) and other stakeholders to ensure safe and efficient operations.
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271	Mzuvukile James Benayo - Angels of Hope	<p>Email dated 13 November 2024:</p> <ol style="list-style-type: none"> Trust you are well <p>I have a group of international investors on my side. Allow me to share this progress with them. I will appreciate it. God bless you in Jesus name.</p>	<p>Email response provided 13 November 2024:</p> <ol style="list-style-type: none"> Thank you for the email. Your response is noted.
272	Elmaleen du Plessis – Admin Officer Subcouncil 7	<p>Email dated 13 November 2024:</p> <ol style="list-style-type: none"> Could you kindly add the following persons to your Interested and affected parties distribution list, thank you. <p>Ward Councillor: Francois Berry (francois.berry@capetown.gov.za)</p> <p>Subcouncil 7 Manager: Lorraine Frost (Lorraine.frost@capetown.gov.za)</p> <p>SC 7 Chairperson: Gerhard Fourie (Gerhard.fourie@capetown.gov.za)</p>	<p>Email response provided 13 November 2024:</p> <ol style="list-style-type: none"> Thank you for the email. <p>We will add the below details to the IAP list.</p>
273 & 279	Larry Eichstadt - Resource Management Services	<p>Email dated 13 November 2024:</p> <ol style="list-style-type: none"> The circulation of a DEIR of such a significant project during this time of the year without making the DEIR available well into January 2025 is highly questionable. It would appear as if the PPP process is being driven to the satisfaction of the client's deadlines with complete disregard to fair public consulta on processes. The notification of a public open day one week prior to the date and the fact that no formal public meeting where all professionals are required to formally present their reports and be questioned in a transparent manner and where necessary defend their findings compounds the 	<p>Email response provided 13 November 2024:</p> <ol style="list-style-type: none"> Thank you for your email. <p>Your concerns are noted, and you are welcome to attend the open day on the 20th November where you can interact with specialists and raise your queries.</p> <p>Please refer to the various specialist studies completed for the proposed project at the download link:</p>

		<p>questionable PPP process and amplifies the fact that focus is on the client’s needs and desires and not the EIA process and associated ethics. Why is no copy of the DEIR being placed at the Durbanville Public library?</p> <p>Due to the limited me now available for I&AP’s to respond to the DEIR it would be appreciated if you could provide guidance towards where the real life monitoring of air quality emissions at the City of Cape Town airport can be found and how this has been incorporated into the AQIA and modelling.</p> <p>During the Scoping process it was requested that the Socio-Economic Impact Assessment must include an assessment of individual Case Studies such as Lanseria Airport. Please confirm whether the Lanseria Case Study was assessed as part of the S-E.</p>	<p>https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/</p> <p>Additional responses by EAP:</p> <p>Comment: “The notification of a public open day one week prior to the date and the fact that no formal public meeting where all professionals are required to formally present their reports and be questioned in a transparent manner and where necessary defend their findings compounds the questionable PPP process and amplifies the fact that focus is on the client’s needs and desires and not the EIA process and associated ethics.”</p> <p>Response: IAPs were notified of the open day with a week’s notice to enable attendance, interaction with specialists and obtaining additional information regarding the project on the day. This enabled another 3 weeks to provide comment by the deadline of 13 December. The NEMA timeline requires completion of 30 days of PPP and submission to DEA&DP by 21 February 2025. Another 30 days PPP is planned for early 2025 to enable IAPs to comment again on the draft EIAR and supplementary documentation. This was stated in the draft EIAR.</p> <p>Comment: “Why is no copy of the DEIR being placed at the Durbanville Public library?” A hard copy was placed in the Fisantekraal library – a community which does not have access to electronic means to download the documents from the website link.</p> <p>Comment: “....it would be appreciated if you could provide guidance towards where the real life monitoring of air quality emissions at the City of Cape Town airport can be found and how this has been incorporated into the AQIA and modelling.”</p> <p>Response from specialist: There are no existing air quality monitoring stations in the immediate vicinity of the CWA.</p> <p>The Western Cape Province and the City of Cape Town operate several ambient air quality monitoring stations in the region. The stations closest to the project site include:</p>
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			<ul style="list-style-type: none"> ➤ The Wallacedene Station, which is located in Kraaifontein, approximately 10km south of the CWA; ➤ The Paarl Station, which is approximately 21km east of the CWA; and ➤ The Stellenbosch Station, which is approximately 22km to the southeast of the CWA. <p>Since, no air quality stations exist in the immediate vicinity of the CWA, the AQIA took into account cumulative emissions and their impacts of several other source in the extended area around the CWA. These can be found in the AQIA report.</p> <p>Comment: “During the Scoping process it was requested that the Socio-Economic Impact Assessment must include an assessment of individual Case Studies such as Lanseria Airport. Please confirm whether the Lanseria Case Study was assessed as part of the S-E.”</p> <p>Response from specialist: International case studies were included on small airports for which information was available, such as Cairns (Australia) and Windhoek (Namibia). However, limited information on Lanseria is available. The following may provide some high-level context and will be included in the final report:</p> <p>Lanseria Airport has operated since 1974 and has become a secondary airport to ORT. In the absence of the environmental impact assessment conducted when the airport was first established, I would assume that parallels could be drawn with the socio-economic impacts currently tabled for the CWA project.</p> <p>Lanseria evolved from a small airport accommodating private aircraft and general aviation to a fully-fledged secondary airport accommodating several domestic low-cost carriers, to introduce regional flights. Lanseria is privately owned, similar to CWA. Lanseria plans to expand its facilities and infrastructure by investing R1 to R1.5 billion in the next few years. In addition, Lanseria has resulted in significant development in the vicinity of the airport, and more is planned, with the Lanseria area set to be converted into one of</p>
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		<p>Email reply dated 13 November 2024:</p> <p>2. Noted.</p> <p>Mail has been submitted to DEADP:DM (Natasha Bieding) highlighting the inadequate PPP process. PPP processes are not about just checking boxes to meet client's expectations and demands but about making sure all stakeholders have a fair chance to participate in the process in a fair and equitable manner.</p> <p>The matter will also be highlighted in the Tygerburger should they wish to address the matter as per an article.</p> <p>I can just imagine what would happen if RMS tried the current legalistic approach with a waste project where the EIA process is devoid of political support and potential political manipulation as previously mentioned per public text.</p> <p>Email reply dated 13 November 2024:</p> <p>3. Quite correct you have checked the box!</p>	<p>Gauteng's first smart cities. The project will include a business gateway, a three-tower precinct and a corporate estate.</p> <p>Due to its location north of Johannesburg, Lanseria's socio-economic impacts would be similar to that of CWA. The point is that Lanseria Airport has not stifled the development of surrounding land portions; just the opposite is occurring. Addressing demand is at the forefront of the direction Lanseria appears to be taking to accommodate the need for economic growth.</p> <p>Email response provided 13 November 2024:</p> <p>2. Thank you for the response.</p> <p>Please note we are within a regulated timeframe into NEMA.</p> <p>Please refer to section 10 of the draft EIA report for further clarity on required milestones and timelines.</p> <p>3. This comment is noted.</p>
		<p>Email dated 13 November 2024 (repeat of comment 273):</p> <p>4. The circulation of a DEIR of such a significant project during this me of the year without making the DEIR available well into January 2025 is highly questionable. It would appear as if the PPP process is being driven to the satisfaction of the client's deadlines with complete disregard to fair public consulta on processes. The notification of a public open day one week prior to</p>	<p>Email response provided 13 November 2024:</p> <p>4. I have responded to this query in my previous communication.</p>

		<p>the date and the fact that no formal public meeting where all professionals are required to formally present their reports and be questioned in a transparent manner and where necessary defend their findings compounds the questionable PPP process and amplifies the fact that focus is on the client's needs and desires and not the EIA process and associated ethics. Why is no copy of the DEIR being placed at the Durbanville Public library?</p> <p>Due to the limited time now available for I&AP's to respond to the DEIR it would be appreciated if you could provide guidance towards where the real life monitoring of air quality emissions at the City of Cape Town airport can be found and how this has been incorporated into the AQIA and modelling.</p> <p>During the Scoping process it was requested that the Socio-Economic Impact Assessment must include an assessment of individual Case Studies such as Lanseria Airport. Please confirm whether the Lanseria Case Study was assessed as part of the S-E.</p> <p>Email from IAP to DEADP dated 13 November 2024:</p> <p>5. Please take note of communication with the EAP for Winelands Airport Project. The PPP process may legalistically check boxes and time frames but does not meet the standard for adequate public consultation in light of the varied public opposition to the project.</p> <p>Please also take note of the queries relating to 2 key specialist studies as to whether the information requested during the Scoping phase as part of these studies has in actual fact been included in the specialists scope.</p> <p>Email from IAP to EAP dated 18 November 2024:</p> <p>6. Please take note of response to DEA&DP:DM to which you were not copied in.</p>	<p>Further EAP response: See response from specialist above re Lanseria case study request.</p> <p>5. This communication is noted.</p> <p>Please refer to the various specialist studies completed for the proposed project at the download link:</p> <p>https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/</p> <p>Email response provided 18 November 2024:</p> <p>6. Your email to DEA&DP is noted.</p>
274		<p>Email dated 13 November 2024:</p> <p>1. Thank you for your email communication below regarding the above, this office confirms receipt.</p>	<p>Email response provided 13 November 2024:</p> <p>1. We will remove all other CoCT Officials from the IAP list as per your instruction.</p>

<p>Sonja Warnich Stemmet – CoCT Northern Region District Head: Environmental & Heritage Management, Environmental Management Department</p>	<p>Please be reminded that the official (and only) City entry point for your EIA pertaining to this project will be the Northern Region District Head: Environmental & Heritage Management, Environmental Management Department (EMD) for Attention: Ms Sonja Warnich-Stemmet (Email: sonja.warnichstemmet@capetown.gov.za).</p> <p>EMD will ensure that the project is distributed internally to the relevant/appropriate City officials. You are kindly requested to refrain from distributing notifications to a number of other ad hoc City officials.</p>	<p>EAP response: The councillors in the register will be kept as it is a NEMA requirement to include them.</p>
	<p>Email reply provided 20 February 2025:</p> <p>2. Your email communication received on 17 February 2025 refers.</p> <p>Please find attached suggestions as requested (Please refer to Appendix F (C274) of this Comments and Response Report)</p> <p>Please be informed, The Environmental Management Department: Environmental & Heritage Management Branch-North (EMD) is the official Entry- and Exit point to the City of Cape Town for the PPP comment in terms of the City of Cape Town’s Systems of Delegation. As such, you do not need to circulate your EIAs to random internal City departments. EMD will assess the documentation and circulate the report internally in order to ensure that the relevant departments receive the report. Thereafter, you will be provided with one singular co ordinated City comment, dispatched from this office.</p> <p>I trust the above is of assistance.</p>	<p>Follow-up email dated 14 February 2025:</p> <p>2. Hope you are well. Your email below refers.</p> <p>We sifted through the register and listed all the CoCT officials previously communicated with as part of the PPP for the proposed project.</p> <p>Attached is the list of officials with annotation KEEP or REMOVE from register. We kept the councillors as NEMA regulations require direct notification to these officials, and we highlighted the officials we were unsure of as PLEASE ADVISE. Most of these names were listed as they are talking directly with the bulk engineering consultant or the traffic consultant and asked to be included in communication as the project progresses. And then there were officials copied in by private individuals or that registered in their private capacity.</p> <p>Can you please scan the list and let me know if you agree with those annotated KEEP / REMOVE and also advise on the PLEASE ADVISE names. Let me know if anything is unclear.</p> <p>We would appreciate a reply by Friday 21 February as we are preparing for the next round of PPP.</p> <p>Email response provided 20 February 2025:</p> <p>3. Appreciate the feedback</p>

275	Werner Rossle CoCT - Head Operations North: Wastewater Branch, Bulk Services, Water and Sanitation	<p>Email dated 13 November 2024:</p> <ol style="list-style-type: none"> I cannot locate the documents mentioned in the list of 47 provided on the website? <p style="text-align: center;">Availability of report and opportunity to participate: The In-Pro Report, Water Use Licence Technical Report , Waste Managei</p> <p>Email reply dated 13 November 2024:</p> <ol style="list-style-type: none"> The list of 47 documents from your link supplied do not contain the names Water Use Licence Technical Report etc., as per your email: 	<p>Email response provided 13 November 2024:</p> <ol style="list-style-type: none"> Thank you for the email. <p>Please follow the download link https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/ where you will be able to download these documents.</p> <p>Please let me know if you have any further challenges</p> <p>Email response provided 13 November 2024:</p> <ol style="list-style-type: none"> Due to space limitations we sometime have to shorten the file names. <p>The Water Use Licence application is APPENDIX 31: WULA Technical Report (inclusive of WULA process status and Geohydrological report).</p> <p>The In process draft Environmental report is the first document at the top of the list and is labelled CWA draft EIA 12 Nov 24.</p> <p>The Waste Management Plan is included in Appendix 43B. The Maintenance Management Plan is Appendix 38.</p> <p>Please let me know if I can be of further assistance.</p>
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AIRPORT

Proposed Expansion of existing Cape Winelands Airport

(P10/724, RE/724, P23/724, P7/942; RE/474, P3/474, P4/474)

DEA&DP Ref: 16/3/3/2/A5/20/2046/24; DWS Ref No: WU33620

Closing date for comment **13 December 2024**

Please select below which document you wish to download:

- [\[1\] CWA draft EIA 12 Nov 24](#)
- [\[2\] App 1 EAP CV](#)
- [\[3\] App 2 CWA Screening and SSV](#)
- [\[4\] App 3 CWA Groundwater Impact Assessment](#)
- [\[5\] App 4 CWA Air Quality Impact Report](#)
- [\[6\] App 5 CWA Noise Impact Assessment](#)
- [\[7\] App 6 CWA Botanical Impact Assessment](#)
- [\[8\] App 7 CWA Freshwater Impact Assessment](#)
- [\[9\] App 8 CWA Wetland Offset report](#)
- [\[10\] App 9 CWA Faunal and Avifaunal IA Part A](#)
- [\[11\] App 10 CWA Faunal IA Part B](#)
- [\[12\] App 11 CWA Avifaunal Part C](#)
- [\[13\] App 12 Terrestrial offset report](#)
- [\[14\] App 13 CWA Heritage Impact Assessment](#)
- [\[15\] App 14 CWA Archaeological Scoping](#)
- [\[16\] App 15 CWA Visual IA](#)
- [\[17\] App 16 CWA Diversion Airport Analysis Excerpt](#)
- [\[18\] App 17 CWA Civil Aviation Baseline and Site Sensitivity](#)
- [\[19\] App 18 CWA Annex 14 OLS](#)
- [\[20\] App 19 CWA Airspace CONOPS](#)
- [\[21\] App 20 CWA OLS Height Limitations](#)
- [\[22\] App 21 CWA Airspace and Coexisr Study](#)
- [\[23\] App 22 Visualization of FACT and FAWN combined operations](#)
- [\[24\] App 23 CWA Alternate Airport study](#)
- [\[25\] App 24 CWA Socio Econ Impact Assessment](#)
- [\[26\] App 25 CWA Transport Impact Assessment](#)
- [\[27\] App 26 CWA SDP and layout plans](#)
- [\[28\] App 27 CWA Aircraft Refuelling Facilities](#)
- [\[29\] App 28 Agro-Ecosystem Impact Assessment](#)
- [\[30\] App 29 CWA Climate Change Impact Assessment](#)
- [\[31\] App 30A - \(Sanitised\) C&R Report \(Pre-application Scoping Phase\)](#)
- [\[32\] App 30B In-Process Draft CR Report - Sanitised compressed](#)
- [\[33\] App 31 CWA WUIA Technical report](#)
- [\[34\] App 32 CWA Scope and Principles Outdoor Advertising](#)
- [\[35\] App 33 CWA Architectural Design Guidelines](#)
- [\[36\] App 34 CWA Hydrogeology Assessment](#)
- [\[37\] App 35 CWA Glint and Glare](#)
- [\[38\] App 37 CWA Bird Strike Risk Assessment](#)
- [\[39\] App 38 CWA MMP](#)
- [\[40\] App 39 CWA Poultry Biosecurity Assessment](#)
- [\[41\] App 40 CWA in the context of Spatial Policy and Land Use Rights](#)
- [\[42\] App 41 CWA Engineering Services Report REV 1 and Appendices web](#)
- [\[43\] App 42 Electrical Supply Technical Report](#)
- [\[44\] App 43A EMPr Main Report](#)
- [\[45\] App 43B EMPr Annexures](#)
- [\[46\] App 44 \(Sanitised\) Engagement with IAPs to date](#)
- [\[47\] App 45 CWA draft Civil Aviation Compliance Statement](#)
- [\[48\] App 46 CWA Concept Stormwater Management Plan web](#)
- [\[49\] App 47 Impact Assessment Summary](#)

		Email reply dated 13 November 2024: 3. Thanks for assistance – appreciated!	
276	Neheletso Cliford	Email dated 13 November 2024: 1. Thank you I've received	1. This comment is noted.
277	Marsha Mac Nicol – Resource Management Services	Email dated 13 November 2024: 1. Please register me as an I&AP for the project. Please confirm registration.	Email response provided 13 November 2024: 1. We will register you as IAP for the proposed project.
278	n/a	Email dated 13 November 2024: 1. It is with regret that I must please opt out of these communications and the project as a whole. Not that I in any way withdraw my support, but unfortunately I have relocated overseas permanently . I wish you only the best , as I do all of Cape Town , its people and surrounds.	Email response provided 13 November 2024: 1. Thank you for the email and we take note of the contents.
280 & 318	Susan Rheeder - The Pearly Trust	Email dated 13 November 2024: 1. As you are aware, it is currently final exams and year end. This is a very poor time to have public meetings/participations. 7 days notice for a public meeting is not enough time. Only 30 days to comment on 49 documents is not enough time either. There is also not enough time to go through all the documentation in order to ask informed questions at the time of the meeting. I request the following please: a. 30 days notice for a public meeting. b. 90 Days period for comments from the day of the public meeting. c. That this public participation be moved to the end of January 2025. Email reply dated 13 November 2024: 2. Noted. Could you kindly provide these documents in Afrikaans please?	Email response provided 13 November 2024: 1. Thank you for the email and your concerns are noted. Unfortunately, we are within a regulated timeframe in terms of , within which we have to complete 30 days of public consultation prior to submission of the final report by 21 February 2025. Therefor these dates and timelines cannot be amended at this stage. Please refer to the draft EIA report Section 10 for more clarity of these timeframes. NOTE: the final submission date has been amended since this reply to the 29 th August 2025. Email response provided 13 November 2024: 2. Unfortunately, all the documentation is in English.

			<p>Email follow-up after telephonic communication provided on 27 November 2024:</p> <p>3. Based on our telephonic conversation yesterday I now understand you requested this extension on behalf of the Pearly Trust.</p> <p>We hereby grant the extension for comments until 13 January 2025.</p>
		<p>Email dated 3 December 2024:</p> <p>1. Thank you for your correspondence and assistance. Kindly find attached the letter from the Joostenbergvlakte Community Forum EXCO re the current Public Participation Process.</p> <p>Letter received via email dated 3 December 2024:</p> <p>2. The Joostenbergvlakte Community Forum (hereinafter referred to as the JCF) – representing more than 400 residents - opposes the current Public Participation Process for the following reasons:</p> <p>2.1. The JCF received Notice of an In-process Scoping report for Public Participation (DEA&DP ref: 16/3/3/6/7/2/A5/20/2209/23) via email on 23 July 2024. You gave us 30 days to respond with comments which closed on 26 August 2024. It left us with only 24 days to read through all the documents and provide comments.</p> <p>2.2. On 13 November 2024 the JCF received Notice of an In-process EIA report for Public Participation (DEA&DP ref: 16/3/3/2/A5/20/2046/24) via email. You gave us 30 days to study 6 056 pages and provide comment before 13 December 2024. It leaves us with 16 days to study 6 056 pages and prepare comments before closing date.</p>	<p>Email response provided 4 December 2024:</p> <p>1. Thank you for the email. We hereby confirm receipt of your e-mail and that we grant JCF extension until 13 January 2025, considering the required NEMA timeframes applicable to the EIA. Please note that your concerns and comments will be captured and that formal responses will be provided in the C&R during the next 30-day consultation period early 2025.</p> <p>2. EAP response</p> <p>2.1 The IAP was provided with 30 days to comment as required by NEMA regulations.</p> <p>2.2 The IAP was provided with 30 days to comment as required by NEMA regulations.</p>

		<p>2.3. In an email dated 30 April 2024 you announced a Public Meeting to take place on Thursday, 08 May 2024 (5 days Notice), and in your email dated 13 November 2024, you also mentioned a Public Meeting to be held on Wednesday, 20 November 2024 from 14:00 to 20:00 at Goedgeleeven Venue, Klipheuwel Road, Durbanville (7 days Notice).</p> <p>2.4. We refer to your Draft Scoping report of 22 July 2024 which reflects your timeframe table on Page 394: In this table Acceptance of the Scoping Report is listed as 18 October 2024, with the first round of Public Participation on the Draft Environmental Impact Assessment Report scheduled to run from 22 October until 23 November 2024. We noticed that these timeframes were changed on Page 703 of your Draft Environmental Impact Assessment Report. Although the Scoping Report was accepted a few days earlier on 15 October 2024, the DEIAR was only circulated for its first round of Public Participation on 13 November 2024 with closing date on 13 December 2024. You initially opted for just 4 days from acceptance of the Scoping Report to Circulation of the DEIAR, but it took 29 days. Instead of the DEIAR being released on 22 October 2024, it was released on 13 November 2024, so you used up an extra 25 days of the 106 days you say NEMA allows. You should grant all I&AP's an extra 25 days and not just the 8 days for those that requested extension.</p> <p>2.5. A period of 24 days to study and prepare comments on 6 056 pages is unimaginable. This type of scenario comes up every year before the December holidays. Please keep in mind that you are working with the public. The public whose children are in the middle of an end-of-year exam. Many children are in matric.</p> <p>2.6. Children who have already finished their exams on 20 November 2024 do not have to return to school and received their books for 2025, thus many families have already left for vacation. There is no way we can expect residents to study 6 056 pages during their family time and during the Christmas holidays. Most people return from 5 to 10 Jan 2025.</p> <p>2.7. You mentioned in your mail dated 28 November 2024 that extension is only granted on a case by-case basis. This means that only Dr Gale and The Pearly Trust received extension until 13 January 2025. What about the rest of the public? Isn't it unfair to only grant extensions to certain I&APs? Secondly, it means that if someone gets an extension, they will have to work through the</p>	<p>2.3 The notice period for the Public Meeting on 8 May 2024 was 9 days. The notice period for the open day on 20 November 2024 was 8 days.</p> <p>2.4. The public participation dates reflected in the draft EAIR is based on project planning. When there are delays caused by technical or specialist studies it will be amended.</p> <p>2.5. The public participation period is 30 days and not 24 days.</p> <p>2.6. Schools in the Western Cape closed on 11 December 2024.</p> <p>2.7. Extension is granted on a case by case basis as requested by the individual IAP. Another round of 30 days PPP is planned for early 2025.</p>
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		<p>to incorporate extra steps in the Public Participation Process.” In the table that follows the above-mentioned extract from the DEA Guidelines, mention is made of "anticipated impacts, public and environmental sensitivity of the project and potentially affected parties." With all the above in mind Joostenbergvlakte does need a public meeting in our neighbourhood. This means that you cannot meet the minimum requirements. We are an equestrian community. Here are aviaries that breed exotic birds that are exported, shelters for rescued animals, a monkey sanctuary, to name a few. Not to mention all the wild animals. We are an environmentally sensitive area and this development has an anticipated impact on an already sensitive area. You have opted for an “open house format” without any record of questions asked or answers supplied. Above mentioned guidelines promote a Public Meeting for special or/and marginalized communities.</p> <p>2.13. The right to Public Participation is a human right. The idea of Public Participation is that the public should be involved more fully in the process instead of treating them as simply passive recipients of important decisions. Public Participation is only sustained if citizens support it and if their involvement is actively supported. In recent years Public Participation has become seen as a vital part of addressing environmental problems and bringing about sustainable development. Developers should work closely with local communities. Local communities are crucial stakeholders for Heritage. Communities, like Joostenbergvlakte, Fisantekraal, De Novo, Bloekombos, who are all affected by this decisions have a right to be involved in the decision-making process. It also implies that the public’s contribution will influence decision. Thus, we feel that the Joostenbergvlakte residents be given a fair chance in studying and commenting on the documentation provided.</p> <p>2.14. We formally apply for the following:</p> <p>2.14.1. Public Meeting to be held in our neighbourhood;</p> <p>2.14.2. 90 days from 01 January 2025 to study through all the documentation and compile comments;</p>	<p>2.13. The comment is noted. See earlier responses.</p> <p>Comments received from IAPs during public participation periods are responded to, considered by the specialists and CWA team and may result in amended specialist and technical reports where required. Amendments to reports are underlined unless otherwise indicated by the author.</p> <p>2.14.</p> <p>2.14.1 The request is noted</p> <p>2.14.2 Extension for comment has been granted until COB 13 January 2025.</p>
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		<p>2.14.3. provide the documentation in Afrikaans to the JCF for distribution among residents and isiXhosa to Bloekombos, De Novo and Fisantekraal before the Public Participation starts.</p> <p>Most people receive their emails on their work computers. These people are already on leave and will never be able to take part in the Public Participation. Joostenbergvlakte does not receive the local newspapers (Die Burger/TygerBurger). We also do not have any mail delivery services and are therefore solely dependent on email correspondence.</p> <p>The whole situation leaves a bitter taste in the mouth of many people who have already worked hard throughout the year and are looking forward to quality family time and a peaceful rest.</p>	<p>2.14.3 Reports are provided in English.</p> <p>The EAP has notified registered IAPs (including those from Joostenbergvlakte) of PPP and the electronic files are placed on the PHS Consulting website for all IAPs to access and comment on.</p>
			<p>Email from EAP dated 6 February 2025:</p> <p>1. I have not received comments from you post the granting of the extension period. Please let me know if you intend to send them or if the comments received from Dr Gale on 13 January 2025 was also on behalf of JCF?</p> <p>NOTE: no further comments were received.</p>
281	Linda Weber	<p>Email dated 13 November 2024:</p> <p>1. THANK YOU AMANDA, For this invite. Much Appreciated</p>	<p>Email dated 13 November 2024:</p> <p>1. This comment is noted.</p>
282	Ian Rose	<p>Email dated 13 November 2024:</p> <p>1. Thank you for your mail. With respect to the call for comments, my comment is as follows:</p> <ol style="list-style-type: none"> 1. I am in no way whatsoever affiliated to the applicant or it's agents. 2. I am in (FULL) support of the application for expansion of Cape Winelands Airport. 	<p>Email response provided 13 November 2024:</p> <p>1. Thank you for your email. We will record your comments</p>

283	Rhynhardt Bresler - Councillor Ward 102 – City of Cape Town	Email dated 13 November 2024: 1. I take note of the mail. Thanks.	1. This comment is noted.
284	Johan Smit - Sage Wise 67	Email dated 13 November 2024: 1. Received on behalf of Sage Wise 67. thank you.	1. This comment is noted.
285	Renier Smith - Garden Cities NPC (RF)	Email dated 13 November 2024: 1. We acknowledge receipt of your notification and to enable us to review this substantial application thoroughly, can we please kindly request clarification as to the following: <ul style="list-style-type: none">- Omitted Appendix 35.- Can you possibly furnish us with a hard copy of the Draft EIA (12 Nov 2024) and supporting hard copies Appendixes 1 to 47 (35?) soonest to assist with this review as we are directly impacted on by this application. Regrettably we cannot set aside the time required to review the hard copies at the library, hence the request.	Email response provided 13 November 2024: 1. Thank you for the email. Appendix 35 remains part of the supplementary documents. IT has corrected the glitch on our website, so it displays correctly for download. Hard copies are provided to IAPs that do not have access to electronic means to download the documents from the website.
286	JP Mathee - Prime OHS Management	Email dated 13 November 2024: 1. Thanks!	1. This comment is noted.
287	Anthony Hayes	Email dated 13 November 2024: 1. All the best succeeding in this next step.	1. This comment is noted.
288	Rahab Maboja - Department of Agriculture, Land Reform & Rural Development	Email dated 13 November 2024: 1. Good day, these mail serve to confirm receipt of the notification below.	1. This comment is noted.
		Email dated 14 November 2024:	

289 & 313	Bert van Koersveld - Spot On Civil Services	<p>1. Thank you for keeping me abreast as to progress to the project.</p> <p>Email dated 22 November 2024:</p> <p>2. Thank you for the privilege of being able to attend the conceptual “design presentation”. Wish you and the -The professional team all the best with this endeavour.</p>	<p>1. This comment is noted.</p> <p>Email response provided 22 November 2024:</p> <p>2. Thank you for the email and your attendance at the open day.</p>
290 & 332	Application Manager - Western Cape Roads Infrastructure	<p>Email dated 13 November 2024:</p> <p>1. The message below refers to your application for the submission of a property environmental study for comment (Application No - 2024-11-0061) submitted to the Western Cape Government on 2024/11/12:</p> <p>Properties related to the application:</p> <ul style="list-style-type: none"> • Portion 7 of Farm KLIPRUG 942, MALMESBURY • Portion 0 of Farm JOOSTENBERGS KLOOF 474, PAARL • Portion 10 of Farm JOOSTENBERG VLAKTE 724, PAARL • Portion 23 of Farm JOOSTENBERG VLAKTE 724 PAARL • Portion 0 of Farm JOOSTENBERG VLAKTE 724 PAARL • Portion 4 of Farm JOOSTENBERGS KLOOF 474, PAARL • Portion 3 of Farm JOOSTENBERGS KLOOF 474, PAARL <p>Supporting documents submitted with the application:</p> <ul style="list-style-type: none"> • Environmental Impact Assessment Report - (CWA-draft-EIA-12-Nov-24.pdf) • Application Motivation - (App-41-CWA-Engineering-Services-Report-REV-I-and Appendices-web.pdf) • Application Cover Letter - (CWA EIA State Nov 2024.pdf) • Traffic Impact Assessment Report - (App-25-CWA-Transport-Impact-Assessment.pdf) 	<p>1. This comment is noted.</p>

		<ul style="list-style-type: none"> • Site Development Plan - (App-26-CWA-SDP-and-layout-plans.pdf) • Application Cover Letter - (email correspondence.pdf) <p>The matter is receiving attention, and further communication will be addressed to you as soon as circumstances permit.</p>	
		<p>Email dated 13 December 2024:</p> <p>1. The message below refers to your application for the submission of a property environmental study for comment (Application No - 2024-11-0061) submitted to the Western Cape Government on 2024/11/13.</p> <p><u>Properties related to the application</u></p> <ul style="list-style-type: none"> • Portion 7 of Farm KLIPRUG 942, MALMESBURY • Portion 0 of Farm JOOSTENBERGS KLOOF 474, PAARL • Portion 10 of Farm JOOSTENBERG VLAKTE 724, PAARL • Portion 23 of Farm JOOSTENBERG VLAKTE 724 PAARL • Portion 0 of Farm JOOSTENBERG VLAKTE 724 PAARL • Portion 4 of Farm JOOSTENBERGS KLOOF 474, PAARL • Portion 3 of Farm JOOSTENBERGS KLOOF 474, PAARL <p>Attached find this Branch's response to your application.</p>	<p>1. This comment is noted.</p>
		<p>Letter received via email dated 13 December 2024:</p> <p>1. The following refer:</p> <p>1.1. Your email dated 13 November 2024 requesting comment on the In-Process EIA Report;</p>	<p>1. The comment is noted.</p>

		<p>1.2. The Notice of Public Participation Process (Commenting Period 13 Nov – 13 Dec 2024) and Notice of Public Open Day on 20 November 2024 dated 13 November 2024;</p> <p>1.3. Draft Environmental Impact Assessment Report prepared by PHS Consulting dated November 2024;</p> <p>1.4. Appendix 26 containing the Site Development Plan (SDP) and Linear Layout with coordinates dated November 2024;</p> <p>1.5. and Traffic Impact Assessment (TIA) prepared by Innovative Transport Solutions dated 23 September 2024;</p> <p>2. The City of Cape Town serves as the Road Authority, while this Branch is the approving authority for the following roads:</p> <ul style="list-style-type: none"> • Main Road 188 (MR188; Klipheuwel Road), up to the MR213 intersection; • Main Road 213 (MR213; Lichtenburg Road), between MR188 and MR174; and • Divisional Road 1096 (DR1096; Boy Briers Drive). <p>3. This Branch remains the Road Authority for Main Road 174 (MR174; R304).</p> <p>4. We have reviewed the In-Process Environmental Impact Assessment (EIA) Report and the Traffic Impact Statement (Innovative Transport Solutions, dated 23 September 2024) for the proposed expansion of the Cape Winelands Airport.</p> <p>5. This Branch supports the proposed development under the provisions of NEMA and will provide detailed comments upon receipt of the formal Land Use Application. However, at this stage, the following concerns should be considered in the Land Use Application:</p> <p>5.1. Distribution of Trips Towards MR188</p> <p>The assumption that 70% of trips generated by the Cape Winelands Airport (CWA) will be directed towards MR188 is questionable. Travelers from the south may find it faster to access the airport via MR174, rather than using the R300 (if fully constructed) or the main internal street</p>	<p>2. The clarification is noted.</p> <p>3. Noted</p> <p>4. Noted</p> <p>5. The support for the project is noted.</p> <p>Response from specialist:</p> <p>5.1. The distribution of trips is based on probe data and in-person surveys at the Cape Town International Airport (CTIA). It is agreed that the assignment of trips can follow different routes and might find the R304 (MR174) more convenient. The assignment along MR188 is therefore a</p>
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		<p>network. Increased demand on MR174 could place additional pressure on the MR213/MR174 intersection and the N1/MR174 interchange.</p> <p>5.2. Impact on Stellenbosch Interchange (N1)</p> <p>The terminals at the Stellenbosch Interchange on the N1 are already operating at capacity during peak periods. Additional traffic demand from the CWA is likely to worsen congestion at the interchange. However, the Traffic Impact Assessment (TIA) does not address the potential impact of the CWA on this critical infrastructure.</p> <p>5.3. Inclusion of the R300 in the 2032 Scenario</p> <p>The inclusion of the R300 in the 2032 scenario may be flawed if the connection between the N1 and De Bron Road is not completed by that time. This section of the R300 is under SANRAL's jurisdiction, and no agreement has been signed for SANRAL to design and construct the missing link. Without this connection, the R300 between De Bron Road and MR188 will function as a local distributor. Additionally, this phase of the R300 will include only a single carriageway between De Bron Road and MR188.</p> <p>5.4. Bella Riva Development</p> <p>The TIA does not address airport access from MR188 should the Bella Riva Development not be approved or face delays. This could necessitate the earlier construction of the Lucullus Road extension.</p> <p>5.5. Roundabouts</p> <p>The TIA is silent on the potential use of roundabouts as a traffic control device at appropriate intersections. The benefits of roundabouts compared to traffic signals should be considered.</p> <p>6. Given the significant funding required for road infrastructure to support the CWA development, it is essential for the City of Cape Town and the developer to commit financially to delivering this infrastructure.</p>	<p>worse-case scenario and any assignment away from MR188 (Klipheuwel) will have a positive effect on the transport operation in general.</p> <p>5.2. The detail design of the Stellenbosch interchange is underway and almost at ECSA stage 4 (Documentation and Procurement). The configuration of the proposed upgrade will be included in the final TIA.</p> <p>5.3. It will be unfortunate if the R300 is not connected with the N1 as this is the main objective of providing this piece of infrastructure. If the N1/R300 interchange is delayed, it will be abortive to upgrade the supporting road network in order to fulfil the function of the R300 freeway. It is therefore suggested to test the implication of this scenario through the EMME transport model in the updated TIA for the rezoning application and assess the implication on the adjacent intersections.</p> <p>5.4. Noted. A sensitivity analysis will be done to estimate when the Lucullus northern extension will be required.</p> <p>5.5. Noted. The TIA has maintained the existing intersection control or what is proposed in the relevant Arterial Management Plans. However, a roundabout is proposed at the main access to the airport both in terms of operations and safety.</p> <p>6. Response from CWA: CWA is engaging with the City of Cape Town on all infrastructure related matters.</p>
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291	David Delaney & Cindy Winter - Drakenstein Municipality	<p>Email dated 14 November 2024:</p> <ol style="list-style-type: none"> 1. Good morning Amanda, Receipt of your notification is acknowledged. Comments will be provided before the closing date of 13 December 2024. 2. Good morning Cindy, Notification for your perusal, processing and comment by latest 13 December 2024. <p>Internal email dated 14 November 2024:</p> <ol style="list-style-type: none"> 3. Good morning Mr. Delaney The application was circulated to the relevant line departments yesterday to request comments. Our office will compile the input and send to the EAP. 	<ol style="list-style-type: none"> 1. This comment is noted. 2. This communication is noted. 3. This communication is noted.
292	Justin Reeves - CFS Aviation Group	<p>Email dated 14 November 2024:</p> <ol style="list-style-type: none"> 1. I wish to register my interest in the subject matter, and hereby kindly request that you include me in future correspondence. 	<p>Email response provided 14 November 2024:</p> <ol style="list-style-type: none"> 1. Thank you for the email. You will be registered as an I&AP for the proposed project.
293	Ian Gildenhuys - CoCT Air Quality Officer	<p>Email dated 13 November 2024:</p> <ol style="list-style-type: none"> 1. I acknowledge receipt of your e-mail. Out of interest I don't see references to the NEM:Air Quality Act, in your e-mail insofar as the One Environmental System is concerned? <p>Email reply dated 14 November 2024:</p> <ol style="list-style-type: none"> 2. Noted with thanks. I appreciate the response and reminder of your earlier communication. 	<p>Email response provided 14 November 2024:</p> <ol style="list-style-type: none"> 1. Your question below refers. CWA will not apply for an AEL at this stage. See the attached communication to clarify. It has also been clarified in the draft amended EIAR. [The email attached to this communication has been included as Appendix A (C293) to this report] 2. This comment is noted.

294	Garth Adams - Braaf Compliance Monitoring	<p>Email dated 14 November 2024:</p> <ol style="list-style-type: none"> 1. Please register me as an Interested and Affected Party for the Proposed Expansion of Cape Winelands Airport. (DEA&DP Ref.No.16/3/3/2/A5/20/2046/24). <p>Can you also please direct me to an electronic link where I can access the relevant documentation regarding the project.</p>	<p>Email response provided 14 November 2024:</p> <ol style="list-style-type: none"> 1. Thank you for the email. We will register you as I&AP for the proposed project. You will find the project documents at the link below: https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/
295	Ethne Marais	<p>Email dated 15 November 2024:</p> <ol style="list-style-type: none"> 1. Thanks for info 	<ol style="list-style-type: none"> 1. This comment is noted.
296	Mnikeli Zilani	<p>Email dated 14 November 2024:</p> <ol style="list-style-type: none"> 1. Hopefully this email finds you well. <p>noted with thanks, I will be the part of public participation on the 20th of November.</p>	<ol style="list-style-type: none"> 1. This communication is noted.
297 & 311	Zane Williams - Pampoenkraal Business Forum	<p>Email dated 16 November 2024:</p> <ol style="list-style-type: none"> 1. The subject matter refers. Pampoenkraal Business Forum is an organization registered with all relevant authorities, including Sub Council 7 – Northern Area, Community Organisation Database, of which the Ward (105), your projects is taking place, forms part of. <p>We are elated to be able to confirm attendance of a small delegation of our Executive and Members, to your Public Open Day, scheduled for Wednesday the 20th of November 2024.</p> <p>Looking forward to informally make your acquaintance and would also like to formally request an audience for formal introductions with Cape Winelands Airport Executive, with the keenest sense of urgency, at your earliest of convenience.</p> <p>We are keenly looking forward to future communicate and potential co-operative assistance in the advancement of our common goal in economic emancipation.</p>	<p>Email response provided 16 November 2024:</p> <ol style="list-style-type: none"> 1. Thank you for the email. We are looking forward to seeing you at the open day. I am copying in Deidre that will arrange formal introductions for you to the CWA team.

	<p>Email dated 21 November 2024:</p> <p>As per the subject matter: Reflection on Attendance.</p> <p>2. We would like to extend our appreciation for the warm reception of our Organisation at this of most important of engagements. <u>Public Open Day Interaction with Professionals</u></p> <p>We have to commend you on the methodology applied.</p> <p>Interaction with all professionals was of the highest of standards, as information was broken down to palatable portions in such a way that a layman to the industry could understand and process such.</p> <p>In would like to highlight the interaction we had with your professional heading the Noise Pollution station and Johan, heading the flight routes station, for their captivating manner in which they presented the respective fields of expertise.</p> <p>Mr Nick Ferguson (Exec. MD), Mr Deon Cloete (Exec. MD), Miss Deidre Davids, Col. Anton Olivier and most importantly yourself have to be commended for making all feel included and involved in all aspects concerning the current phase of this historically, exciting and I have to add life changing project.</p> <p><u>Re. Tyger Burger Article – “Have Your say about airport”, dated 20 November 2024</u></p> <p>Pampoenkraal Business Forum, and I know we will be stepping on some toes, if this statement might go public, are of the sincere opinion that this article was quite biased in its content.</p> <p>We are of the sincere, humble opinion that a story has 3 sides, that of the writer, that of a third party and that of the party concerned contained in the subject matter.</p> <p>We strongly feel that this article was aimed at creating negativity toward the project and it’s Project Sponsor, by statements such as, “...The current public consultation process is being driven legalistically, and although it may tick the boxes, it shows complete disrespect to the larger Durbanville community...”</p>	<p>Email response provided 22 November 2024:</p> <p>2. Thank you for the email and the comments.</p>
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		<p>The subject is debatable, but be that as it may, Pampoenkraal Business Forum found the methodology being followed of great interest in allowing “the larger Durbanville community “able opportunity to productively submit its contributions/comments on the platform provided.</p> <p>With the above being said, in closing, thank you once again for the opportunity, to not only attend and be part of the Public Open Day, but to also expand our knowledge and appreciation for the hard work you and your team are doing.</p>	
298	Esme Erasmus - TygerBurger	<p>Email dated 16 November 2024:</p> <ol style="list-style-type: none"> 1. I hope you are well. Crazy time of year. <p>It is a pity this invitation to the open day was sent out so late and so short notice. It was too late last week for publication (our paper comes out on a Wednesday and our final deadline is already on Monday at 10:00) and this Wednesday it is already the open day. I do not know how many of our readers will e able to attend under these circumstances.</p> <p>Some residents are upset about this late notice, also the fact that the public participation is presented in this manner – an open day instead of a full informative meeting with presentations and all role players present etc. And the timing of it all – on the brink of December holidays.</p> <p>Mr Larry Eichstadt complained as follow, as you will be aware, as the email was directed to you: The circulation of a DEIR of such a significant project during this time of the year without making the DEIR available well into January 2025 is highly questionable. It would appear as if the PPP process is being driven to the satisfaction of the client’s deadlines with complete disregard to fair public consultation processes. The notification of a public open day one week prior to the date and the fact that no formal public meeting where all professionals are required to formally present their reports and be questioned in a transparent manner and where necessary defend their findings compounds the questionable PPP process and amplifies the fact that focus is on the client’s needs and desires and not the EIA process and associated ethics. Why is no copy of the DEIR being placed at the Durbanville Public library?</p> <p>Questions:</p>	<p>Email response provided 16 November 2024:</p> <ol style="list-style-type: none"> 1. Hereby our responses in green below. <p>We can assure you that PHS Consulting is following best practice if it comes to public consultation. For ease of reference to illustrate how wide and inclusive we have been with public and authority consulta on please visit our website https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/ and download App 30A & App 30B of consultation record conducted to date. Also view the main CWA Draft EIA 12 Nov the PPP steps we have followed.</p> <p>See our green text in response to your e-mail.</p> <p>We’ve met at the Durbanville Farmers Association meeting this year, and I hope to see you on 20 Nov at the Open Day.</p>

1. Why was the notice of the open day sent out so last minute?
2. Why the choice if public participation – open day instead of informative meeting.
3. Please comment on Mr Larry Eichstadt’s objections.

My deadline is 13:00 latest today please.

I hope you are well. Crazy time of year.

It is a pity this invitation to the open day was sent out so late and so short notice. It was too late last week for publication (our paper comes out on a Wednesday and our final deadline is already on Monday at 10:00) and this Wednesday it is already the open day. I do not know how many of our readers will be able to attend under these circumstances.

It is good practice to have the Open Public Day early in the 30 day comment period, it provides valuable information early enough to assist the public to formulate their comments. The public open day was advertised in the Tygerburger last week 13 November and all the readers should have been able to see. All registered I&APs were also notified directly by either email address or sms.

The deadline for the placement of this advert is actually the Thursday before so we placed and paid for the advert on Thursday 7 November, so Tygerburger was already aware thereof.

Some residents are upset about this late notice, also the fact that the public participation is presented in this manner – an open day instead of a full informative meeting with presentations and all role players present etc. And the timing of it all – on the brink of December holidays.

An open day is regarded as the most efficient way to provide a full informative day. In our case we are allowing for 6 hours of focused engagement from 14h to 20h – giving people the opportunity to interact with the specialists on a one-on-one basis to ask anything they need clarity on. Considering the wide window provided to visit the venue it allow flexibility opposed to a set meeting time, as a result many people already confirmed their attendance.

It is more interactive than sitting in a meeting with presentations and from experience the format of an Open Public Day is more productive, please attend in order to witness this for yourself. Please note that we have already hosted a formal meeting in a community hall on 8 May 2024, which was widely advertised and open to all members of the public. The attendance register will confirm this.

Please be advised that an open day scheduled for 20 November 2024 is not in the December holidays which typically starts from 20 December 2024. Please also be advised that we are within the allowance of the NEMA Regulations and the DEA&DP official circular for completion of public participation within this period.

Mr Larry Eichstadt complained as follow, as you will be aware, as the email was directed to you:

The circulation of a DEIR of such a significant project during this time of the year without making the DEIR available well into January 2025 is highly questionable. The DEIR states on page 10, 703 and 704 that a second round of PPP on the DEIR is planned for early 2025. Therefore this statement is misleading.

		<p>Email reply dated 18 November 2024:</p> <p>2. Hi Paul, thank you for the feedback. I remember you from the meeting of Durbanville Agricultural Association.</p> <p>Just to clarify, the placement and payment of your advertisement is not an indication of me as a journalist being informed of such. The advertising department is a completely separate department and they do not share the content of advertisements with journalists. It would also not be right to share the content of advertisements ahead of the publication date. It is a transaction between the advertising department and the advertiser.</p> <p>I did not see the advertisement on 13 November, but as I have registered as an interested and affected party – specifically to receive email communication to inform me of any further processes, I did not think it necessary to scan the paper for a possible advertisement every week about a possible open day or deadline.</p>	<p>It would appear as if the PPP process is being driven to the satisfaction of the client's deadlines with complete disregard to fair public consultation processes. The PPP process for this project is regulated by the NEMA regulations and the timeframes are set accordingly and not related to client deadlines – this statement is misleading.</p> <p>The notification of a public open day one week prior to the date and the fact that no formal public meeting where all professionals are required to formally present their reports and be questioned in a transparent manner and where necessary defend their findings compounds the questionable PPP process and amplifies the fact that focus is on the client's needs and desires and not the EIA process and associated ethics. We have answered this above</p> <p>Why is no copy of the DEIR being placed at the Durbanville Public library? Placement of hard copies is determined on whether the community has access to electronic means or not and which is the most accessible for people that don't have their own transport. Therefore the Fisantekraal library is justified and the reason for a hard copy being placed plus the facilities are first class, its safe and it has secure parking .</p> <p>Questions:</p> <p>1. Why was the notice of the open day sent out so last minute? The open day invitation was sent out at the start of PPP period as is standard practice. One week notice is adequate considering the flexible time allocation from 14h to 20h. Notice was provided to all I&APs through email & sms and site notices and advert. This is standard practice and not contrary to the NEMA Regulations.</p> <p>2. Why the choice if public participation – open day instead of informative meeting. An Public Open Day is much more affective and productive . Answered above</p> <p>3. Please comment on Mr Larry Eichstadt's objections. Answered above</p> <p>Email response provided 18 November 2024:</p> <p>2. Fyi see the advert in the Tygerburger [Attached to this report as Appendix B (C298)</p> <p>All the notices that went out to all the I&APs on 13 Nov included the reference to the Public Open Day on 20 Nov, and that is the aim everyone knows about the open day in advance.</p>
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		I have only received an email about this on Wednesday 13 November for the first time – too late to report on it last week. Most people only receive their paper after work on a Wednesday (if delivery is on track and there are no unexpected delays) and will most probably only read about the open day when it has already been.	
299	Rasheeda Robertson - Capital Ship	<p>Email dated 18 November 2024:</p> <ol style="list-style-type: none"> Can you please explain what is this about? I do not understand. What is it that I must do? Do I have to sign or attend anything? <p>Email reply dated 18 November 2024:</p> <ol style="list-style-type: none"> Okay I have never done this before, What should I comment? 	<p>Email response provided 18 November 2024:</p> <ol style="list-style-type: none"> You registered as an I&AP for the proposed project. As a registered I&AP you are invited to comment on the draft EIAR and additional documentation available on the website link as provided. Please note that all comments must be with me by 13 December 2024 latest. <p>Email response provided 18 November 2024:</p> <ol style="list-style-type: none"> Please have a look at the documentation available as per the download link. You are welcome to comment or choose not to comment. You will remain on the notification list for the project as a registered I&AP.
300 & 321	Lozaan Burger	<p>Email dated 18 November 2024:</p> <ol style="list-style-type: none"> Is it possible for you to send met the agenda with timeframes? <p>I really want to attend the meeting, but due to my work and the parrot sanctuary chores, I cannot attend the full meeting.</p> <p>Email reply dated 18 November 2024:</p> <ol style="list-style-type: none"> Thank you, I do appreciate. 	<p>Email response provided 18 November 2024:</p> <ol style="list-style-type: none"> It is an open day and not a formal meeting with an agenda, so you can join at any time from 2 to 8 when it is convenient and there is no restriction on your ability to ask questions and interact with the specialists.
		<p>Email dated 9 December 2024:</p> <ol style="list-style-type: none"> I am writing to express my concern about the proposed construction of an airport in close proximity to my residence, [REDACTED]. While I understand the potential economic and infrastructural benefits such a project may bring, the location raises significant issues for me and other residents in the area. <p>As a responsible owner of previously neglected rescue birds, I care for a number of parrots (147 parrots) that are highly sensitive to noise. These birds have delicate auditory systems and can experience stress, health</p>	<p>Email response provided 9 December 2024:</p> <ol style="list-style-type: none"> Thank you for the email and the additional pictures. It was great to meet you and your husband during the open day. <p>Your concerns will be captured and responses formulated will be provided in the Comments and Responses report during the next round of public consultation early 2025.</p>

complications, and behavioural issues when exposed to constant loud noise, such as that generated by airplanes. The stress caused by such noise pollution could result in long-term negative effects on their well-being.

My husband and I did attend the meeting held at Goedgeleved venue on the 20 November 2024. Thank you, Amanda Fritz-Whyte and Paul Slabbert, that you were available to listen to our concerns.

If I may comment on the following aspects:

2. Noise Impact:

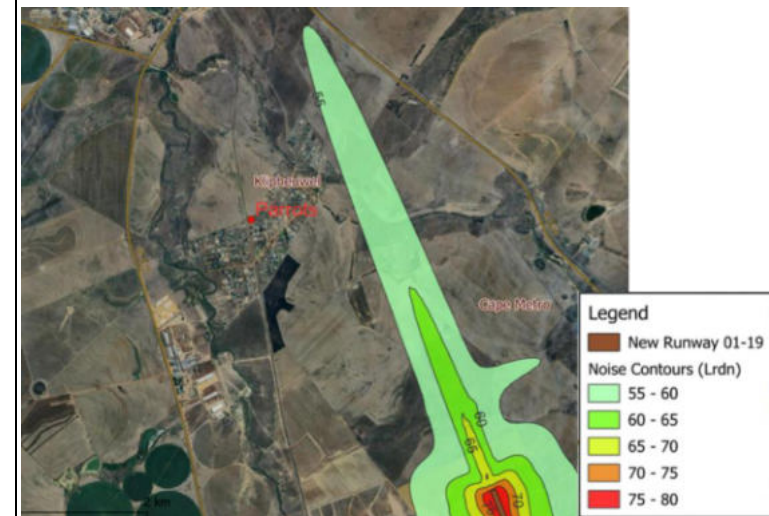
- The noise study was done by a veterinarian on chickens and not on rescue parrots.
- There is a big difference between a chicken and a parrot.
- One is that their brains are structured differently.
- Chickens are pretty intelligent, but parrots have a level of self-awareness that many other creatures don't have.
- Parrots' obvious cleverness, gregarious personalities, rich social lives and long lifespans, gives them a seemingly human-like intelligence.
- The lifespan of a chicken is about 5 years, while a lifespan of a medium to big parrot, is between 40 to 80 years.
- Parrot's bonds with humans. It is traumatized for a parrot to be separated from their flock and from the human that is "part" of their flock.
- For birds, noise is a chronic and unavoidable source of stress. While they have endured loud natural sounds like streams, waterfalls, and wind for centuries, human-made noise pollution is a relatively new and concerning phenomenon.
- Extensive research has established the significant effects that this noise has on birds, including physical harm, behavioural changes, and disruptions to the reproductive cycle. And no, I am not a breeder, I am against parrot breeding.

2. Response from noise specialist:

The noise levels in these locations are available in the NIA and Dr Petty will address the impacts on the said receptors based on the predicted noise levels in these areas.

Rescue Parrots:

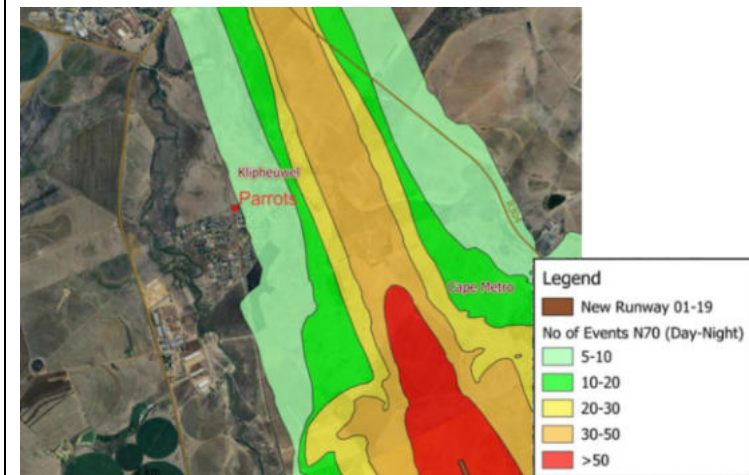
Based on the NIA, for the existing runways at capacity (Scen 1) and the new runway at the opening year (Scen 2), the impact on the parrots' location is negligible. For the new runway at capacity (Scen 3). The following can be observed, based on the location of the parrots:



- The presence of human-generated noise, also known as anthropogenic noise, is closely tied to our daily activities. As human population density increases, so too does the amount of noise we produce. 1 This is particularly evident in urban areas, where modern technologies, vehicles, and conveniences contribute to a constant hum of activity.
- The effects of noise pollution vary depending on the type of noise, including frequency, volume, consistency, and duration.
- Chronic exposure to loud noises can lead to long-term physical effects on birds, such as cardiovascular diseases, feather loss, weight loss, among others.
- Exposure to noise stress caused the birds to experience increased stress levels, as evidenced by physiological measures, and this stress could potentially impact the growth and quality of their feathers.
- Most of the parrots that ended up at my sanctuary are deficient, abused or dysfunctional birds.
- Most of the parrots in my sanctuary are given up for convenience reasons (such as noisemaking too loud or chewing on antique furniture or owners getting old or sick or terminating a marriage or simply having to move to residences far away). Then I've got a lot of parrots with disabilities, these parrots will never find an adoption home.
- There are only a few parrot sanctuaries in the Western Cape, most is full, not enough space. No funds! It is a sad satiation.
- World of Birds/ Hout Bay – Status: over full, not enough funds
- Butterfly World/Klapmuts – Status: Property is in the market, they lost a lot of parrots in the fire last year, no money to rebuild everything.
- Birds of Eden/Plettenberg Bay – Status: Beautiful sanctuary, but also almost full.

The location of the parrots will be well outside the Lrdn of 55dB(A). The airport contribution to the noise level at the parrots' location will be around 47dB(A).

Regarding the number of events that momentarily the maximum level (not the average) will reach or be above the L_{max}=70dB(A), it is evident that the parrots' location will be just outside the 5-10 contour. This means that there will be 4 or less events that the maximum level will gradually and momentarily reach or exceed the 70dB(A) at the parrot' position.



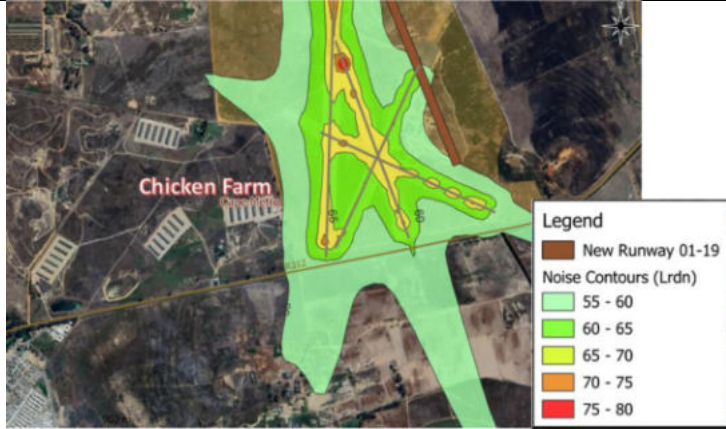
It should also be noted that there will be no aircraft events after 23h00.

Chicken Farm

For Scenario 1, the eastern side of the chicken farm will be immediately outside the 55dB(A) L_{rdn} zone (see Figure below).

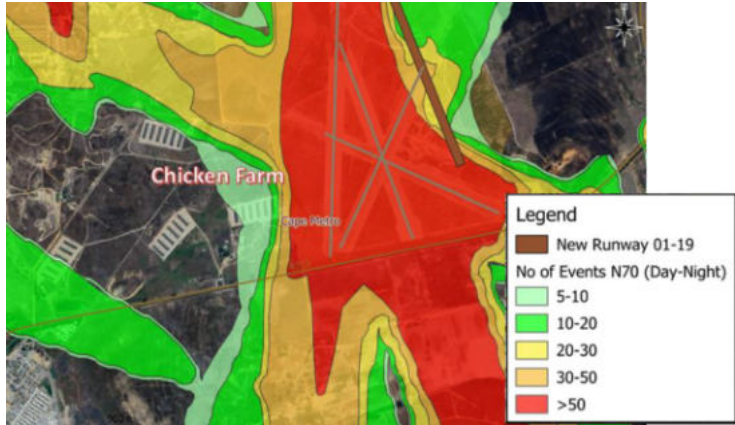
The noise levels at the closest building will be around 53dB(A).

- This is one of the reasons we bought the small holding here in Mikpunt, 8 years ago. The quietness of the area. Low impacted area by the sounds of airplanes and land vehicles.
- The noise level between Klipheuwel and the Mikpunt smallholdings are very different.
- What about us? The effects on the quality of our life? Things including sleep disturbance, inability to concentrate, and depression. We are going to lose the enjoyment of our gardens. Aircraft noise intrusion can, occurs until well after 11pm, and often before 6am.
- We will be impacted by the airport noise. We are only 3km away from the landing strip.

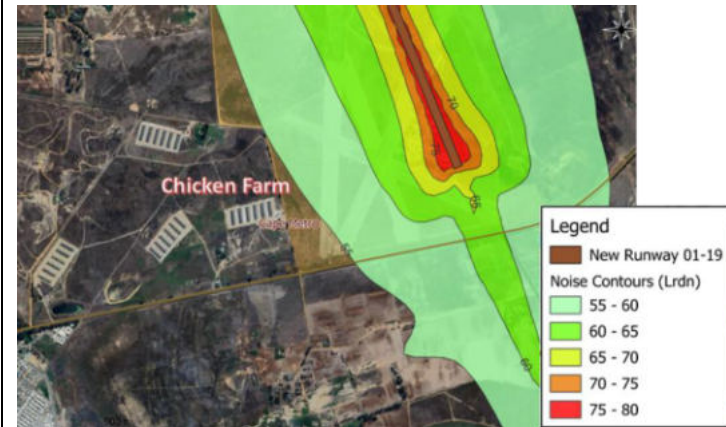


The number of events with noise levels of 70 dBA or above is shown in the figure below. It can be seen that the eastern building will have 5 to 10 events and the western building 10-20 events.

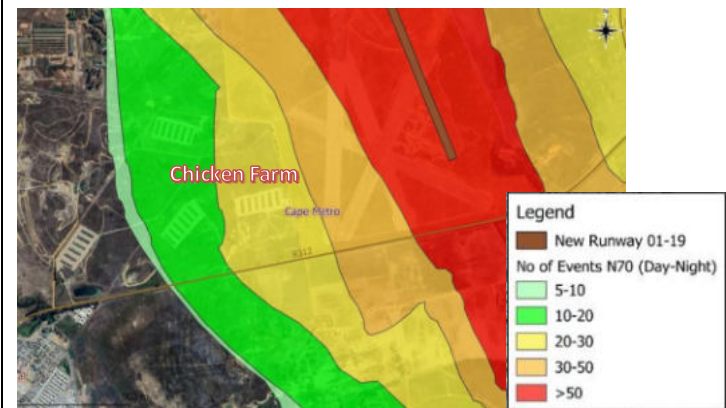
It should be noted that no night-time aircraft operations are planned for this scenario.



For Scenario 3 the 55dB(A) contour will not reach the buildings at the chicken farm, west of the CWA airport. The noise level at the closest building will be 52dB(A) and less than 50 dB(A) at the other ones.



The number of events above 70 dB(A) at the closest chicken farm building is expected to be 20-30. Two of the buildings are within the 10-20 zone and one will experience below 5 of such events. It should be noted that all of the events are expected to take place until 23h00.



		<p>3. Value of our property:</p> <ul style="list-style-type: none"> I asked the question at the meeting; how will this impact the value of our property? The answer was easy, we don't know, some of the property's value may become better, other will lose its value. This is a very big concern for me, we can not stay here because of the noise for the sanctuary parrots, so we will have to move. To rebuild the aviaries and bird rooms, will be way over R500 000. Please see photos attached. We did not buy this property with all these facilities, we built it. <p>4. Traffic Impact Assessment:</p> <ul style="list-style-type: none"> Klipheuwel Road (R302/MR188) is currently a quiet road, it's easy to travel to work (Sanlam Bellville), it will become a nightmare. 	<p>Response from Poultry specialist: The noise specialist captures the essence of the issue in that the parrots are outside the area where noise is being experienced.</p> <p>3. EAP response: According to the amended Socio-economic report (Appendix 23): The Rode study applied internationally accepted depreciation percentages to determine the impact on property values in and around CTIA. The 55 dB(A) impact zone for Scenario 3 covers a total area of 10.3km², extending 4.3 km to the northwest and 3.5km to the southeast from the runway ends. Based on the maps of existing residential areas around CWA, this 55dB(A) impact zone does not overlap with any existing residential dwellings, except for a single farmhouse north of CWA, situated on the eastern side of Klipheuwel. This means that only this farmhouse could experience a potential impact on property values. Based on global benchmarks, property devaluation is estimated at 0.7% per dB(A) increase beyond 55dB(A), with higher-end properties experiencing up to 1.5% per dB(A). Consequently, the farmhouse may see a proximate reduction of 5,6% in value due to noise exposure.</p> <p>Several international studies also concluded that homes under or near the flight corridors of national or international airports experience some diminution in property values (Mense & Kholodilin, 2014). The impact of flight noise levels on property values depends on various factors such as the flight path, the location of residents on either side of the flight path, the flight level of the aircraft, etc. The nature of the airport and the type of aircraft able to land there also play a role. The studies of aircraft noise impacts have focused on large airports catering to international and domestic air traffic, i.e. large and smaller aircraft.</p> <p>4. Response from EAP: The Traffic Impact assessment completed for Phase 1 and 2 of the proposed project assesses the impacts on the existing road infrastructure taking into account other planned developments in the area and planned road infrastructure development over time. Klipheuwel</p>
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		<p>5. Reasons we bought this specific plat 8 years ago:</p> <ul style="list-style-type: none"> • The peace and quietness. • Close to nature, all the wildlife around us. • We border against the Blankenberg farm, so nobody can build next to us. • The strong borehole, clear water, we only use borehole water. <p>Moreover, the construction of an airport near a residential neighbourhood poses broader concerns regarding overall quality of life, including disruptions to sleep and peace due to increased noise levels.</p> <p>I respectfully urge you to reconsider the location of the airport and evaluate alternative sites that do not pose significant disruptions to residential areas or the well-being of animals. I would appreciate the</p>	<p>Road forms part of the existing road network and currently operates at an acceptable LOS during the AM and PM peak hours.</p> <p>According to the TIA: <i>Given the multiple developments planned in the area, over 4 000 background development trips will be added to the road network during the PM peak hour. This increase in traffic will trigger the need for road upgrades, especially along Klipheuwel and Lichtenburg Roads. The proposed upgrades include the dualling of Klipheuwel Road, the installation of traffic signals at several intersections, and the construction of additional turning lanes. The Klipheuwel Road/Arum Lily Street intersection will be converted to a left-in, left-out (LILO) configuration as part of their access management plan (AMP). Based on the 2032 Capacity Analysis the dualling of Klipheuwel Road and the upgrading of several intersections will be required.</i></p> <p>The 2050 Capacity Analysis according to the CoCT EMME model highlights the necessity of upgrading Klipheuwel Road, Lichtenburg Road (between Klipheuwel Road and the Lucullus Road northern extension intersections), and the Lucullus Road northern extension to dual carriageways.</p> <p>5. Response from CWA</p> <p>The application is not for the establishment of a new airport, the application is rather for the expansion of a current airport already in existence and in operation for the last 81 years. The current airport is licenced, operational and has over 100 movements i.e. arriving and departing daily. The airport has been in existence long before the establishment of residential areas such as Mikpunt.</p>
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		<p>opportunity to discuss this matter further and provide additional information if needed.</p> <p>Thank you for your attention to this important issue.</p> <p>6. Yes, I know I cannot win the fight between Cape Winelands Airport, the economic growth for the Western Province, but I need your help. I cannot put all these parrots up for adoption. It's not right to take away their freedom (the aviaries are big, lots of sunlight, they can fly) and put them in a cage again. It's like giving someone parole and through him back in prison, for NO reason. I can also not split the flock, they are "family".</p> <p>7. Note: 2 I include a lot of pictures; the meaning of the pictures is for you to see some of the rescue birds. For you to see this is established aviaries and bird rooms. Specialty build for rescue parrots. For you to see the position of our plot, we bought/build this home for the tranquillity.</p> <p>Please refer to Appendix C (C321) for photo's attached to this email.</p>	<p>6. Response from CWA:</p> <p>Noting the outcome of the specialist noise report, the noise levels in Mikpunt should have no material impact on the parrots, therefore it will not be necessary to relocate the birds.</p> <p>7. Thank you for the photos included.</p> <p>NOTE: a stakeholder meeting with this IAP has been requested and further feedback will be provided.</p>
		<p>Email dated 7 February 2025:</p> <p>1. Best wishes for 2025! I just want to know if there is any movement with my concerns.</p>	<p>Email response provided 10 February 2025:</p> <p>1. Another round of public participation on the draft EIAR is planned for early 2025 during which time you will have the opportunity to see the responses to your concerns in the Comments and Responses report and comment on the amended draft EIAR.</p>
301	Deon Barnard	<p>Email from IAP to EAP and Sondal CID dated 18 November 2024:</p> <p>1. I assume that the SONDAL CID is very much aware of the proposed WINELANDS Airport Expansion Project. A project that will cost all of Durbanville dearly. There is absolutely NO NEED for a small airport on the shores of Durbanville.</p> <p>Cape Town International barely has enough air traffic to operate at <50% efficiency - About 140 flights arrival/departures per day. All that will happen is the surrounding areas of Durbanville will be flooded with job seekers from all over. And will rapidly develop in a similar filthy zone similar to existing conditions at Cape Town International.</p>	<p>1. This communication is noted.</p> <p>Comment: "Cape Town International barely has enough air traffic to operate at <50% efficiency - About 140 flights arrival/departures per day."</p> <p>Response from CWA:</p> <p>The need for CWA and the resulting benefits for industry has been well informed by, and is a response to industry, arrived at after multiple years of</p>

Heathrow has 2 runways dealing with 1400 arrivals / departures per day - 700 per runway. Cape Town International is not close to full capacity. Please note the data from Cape Town Arrivals/Departures for 2023/2024 - About 270 arrivals/departures per day only.

And also note the number of UNSCHEDULED flights arrival/departure in 2023/2024 - Who/What are all these UNSCHEDULED flights??? - Are these the local drug lords delivery services??? Are they all on their way to Durbanville now??? Please go to Cape Town International - We don't need you.

This is a much more serious issue right now than the CID discussions in my opinion. The winelands airport will have a continuous stream of smaller flights landing/departures over Durbanville because the runway is no more than 5 kilometres from Central Durbanville.

I am not sure who these so-called "INVESTORS" are but they are certainly NOT from Durbanville. And as you will note the Consultants are based in HERMANUS. Maybe we can suggest that they first try a prototype in HERMANUS and we can visit and convince ourselves about the details.

And to ensure that very few people attend this so-called NOTICE IS ALSO GIVEN OF A PUBLIC OPEN DAY ON 20 NOVEMBER 2024 AT GOEDGELEVEN VENUE, KLIPHEUWEL RD, DURBANVILLE FROM 14H00 TO 20H00.

Bring your meetings into Durbanville - not the far outskirts of our town.

As the SONDAL CID apparently have most of the Durbanville property owners contact details I suggest this information be forwarded to all.

I also suggest that Durbanville Property owners get involved in setting up some form of an IMPACT study ourselves. There is no need for companies from Hermanus to be involved with this development.

Be aware that all feedback against this lot will end up in some file and will not be made available to Durbanville property owners. All our local roads are now being used as shortcuts to other areas - it has become almost impossible to drive through our town during office hours.

stakeholder and industry engagement. This has been corroborated by industry and association and representative bodies across the sector.

Cape Town International Airport (CTIA) experiences peak-hour congestion and operational bottlenecks, affecting efficiency. Airport efficiency is determined by peak-hour demand, aircraft mix, and operational constraints rather than total flight movements. With Cape Town's growing tourism, trade, and cargo demands, reliance on a single airport presents long-term limitations. Windhoek, a smaller city, operates two airports to support different aviation sectors. Cape Winelands Airport (CWA) is positioned to alleviate congestion, enhance air cargo capacity, and support economic growth.

CTIA Capacity Constraints Based on their 2016 Environmental Impact Assessment Report:

- 2015 – CTIA handled 9.4 million passengers.
- 2016 – The maximum estimated runway capacity was 11.7 million passengers per year.
- 2022-2023 – According to 2016 projections, CTIA was expected to reach or exceed its runway capacity.
- 2032 – Passenger demand is projected to reach 19 million, exceeding existing runway and terminal capacity.
- 2035 – Runway congestion is expected to increase, requiring a rise in declared aircraft movements per hour from 30 ATM to 40-44 ATM.
- Beyond 2040 – Without expansion, CTIA will face severe capacity constraints, impacting tourism, business, and cargo operations.

Key Takeaways:

- In 2015, CTIA was operating at over 80% of its estimated capacity.
- By 2022-2023, the airport was projected to exceed its capacity, necessitating expansion.
- By 2032, demand is expected to be nearly double CTIA's existing capacity, indicating the need for additional infrastructure.

The data indicates that CTIA is approaching its capacity limits, supporting the necessity for CWA as a complementary aviation hub for Cape Town's long-term growth.

		<p>In the end this project will finally destroy all of our last rural areas and there can be almost zero benefits for us the taxpayers of Durbanville. The only possible beneficiaries of this project will be the investors.</p> <p>Some advice to all of them - You can save some billions by the expansion of Cape Town International Airport existing facilities. All the infrastucture they possibly need is already available. And certainly all the labour they may need.</p> <p>Email from Sondal CID to IAP dated 18 November 2024:</p> <ol style="list-style-type: none"> The POPIA declarations that we are party to as steerco members preclude us from using the contact details provided to us by COCT, or by the residents directly, to make any communications to the relevant parties that do not relate directly to the Sondal CID. <p>We would suggest that you use any neighborhood groups you are on to advertise your cause. You can also contact real estate companies in the area, as most of them have newsletters that could include this.</p>	<p>The applicant's sentiment and comment towards the project are noted, however the claims that there will be zero benefits for the taxpayers of Durbanville is unfounded considering the substantial documentation presented around the benefits of this development, and also considering the substantial support received from residents and business owners in Durbanville to date.</p> <p>EAP response: The EAP is based on Hermanus. The EAP is not the Applicant.</p> <p>The request for a meeting in Durbanville is noted. To date a public meeting was held on 8 May 2024 in Fisantekraal and a Public open day was held on 20 November 2024 at Goedgeleven Estate in Fisantekraal.</p> <p>CWA response: Durbanville communities and forums have been central to CWA engagement process and CWA has received positive and strong support for the development from various entities, namely the Durbanville Business Chamber and Durbanville Farmers Association but to name a few.</p> <ol style="list-style-type: none"> This communication is noted.
302	Michael Veldman - Verni	<p>Email dated 18 November 2024:</p> <ol style="list-style-type: none"> I hope you're having a very successful year so far. <p>I'm reaching out to inquire if you can assist me or perhaps direct me to the appropriate person. We are a local manufacturing and distributing company servicing the entire Sub-Saharan Africa region across various types of projects.</p> <p>I would like to explore the possibility of meeting with or emailing the professional teams, as we work closely with engineers and architects to specify materials for projects. Additionally, we are actively involved onsite at no cost</p>	<p>Email response provided 18 November 2024:</p> <ol style="list-style-type: none"> Thank you for your email. Deon Cloete, herein copied, is best placed to assist with your query so I will leave it to him to answer. <p>Email response from Deon Cloete to IAP:</p> <ol style="list-style-type: none"> Michael thank you for reaching out, our immediate focus is securing statutory approvals and funding for the project. I am sure there will be an opportunity at the right time and near future for our professionals to better understand your range of products, in the meantime please be sure

		<p>when our products are used by our certified and approved applicators. We ensure quality by signing off on all work completed under our strict QA/QC processes.</p> <p>We specialize in the following:</p> <ul style="list-style-type: none"> • Epoxy, PU, and Decorative Floor Systems • Permanent Waterproofing Systems (maintenance-free, damage-resistant, and backed by a 25-year warranty) • General Waterproofing Systems • Concrete Repair and Protection Materials • Day-to-Day Materials for Contractors <p>Your response would be greatly appreciated. Please let me know how best to proceed.</p> <p>Email reply dated 18 November 2024:</p> <p>2. Thank you for the response.</p> <p>Email replay dated 19 November 2024:</p> <p>3. Thank you for your response. I've registered our company this morning—thank you for your guidance. When the time is right and the project is ready to proceed, we would be more than willing to deliver a full presentation to the entire professional group. Wishing you and your team the best of luck moving forward. I'm looking forward to seeing the success of the airport project.</p>	<p>to register your interests on our website using the link below: https://capewineland.aero/opportunities/ I trust that you will find this in order.</p>
303	Gareth Tombleson - WBHO	<p>Email dated 19 November 2024:</p> <p>1. Please can you add my name on the database of I&AP for this project?</p>	<p>Email response provided 19 November 2024:</p> <p>1. Thank you for your email. We will add your details to the I&AP register for the proposed project.</p>
304	Janine Greeff - Projects I2b	<p>Email dated 19 November 2024:</p>	<p>Email response provided 19 November 2024:</p>

		<p>1. I hope you are well. I came across a public participation process notice for "proposed expansion of Cape Winelands Airport"</p> <p>I do not have any objections but would like to please be registered as an interested party. Please can you register the email address [REDACTED]</p> <p>I follow building and construction related projects from conceptual / feasibility up until completion.</p> <p>Please can you email me a copy of the background information document or motivating memorandum or any other documents or reports for this project.</p>	<p>1. Thank you for the email.</p> <p>We will register you as an I&AP for the proposed project. The draft EIAR is out for public comment from 13 November to 13 December 2024.</p> <p>You can access the draft EIAR and background documents at the link https://phsconsulting.co.za/proposed_expansion-of-cape-winelands-airport/.</p>
305 & 340	Barbara Gale - Local Resident	<p>Email dated 19 November 2024:</p> <ol style="list-style-type: none"> Thank you for the notification of the Proposed Expansion of Cape Winelands Airport - In-Process EIA Report for Public Participation (DEA&DP ref: 16/3/3/2/A5/20/2046/24). Owing to the large volume of documents (Main report 712 pages plus 47 Appendices), and the approaching holiday season, I wish to request an extension for comment until 17 January 2025. Also, only seven days notice for a Public Open Day is way too short and I would like to request a public meeting (not an Open Day) for around 8 January 2025. The public participation process, although meeting the minimum requirements, did not take into account, as required by the EIA Regulations (2014), the Public Participation Guideline (ito NEMA) with respect to communities that require additional actions beyond the minimum requirements. <p>Whereas PHSC have met the minimum requirements for Public Participation as given in the EIA Regulations (2014 as amended 2021), Section 41. (2) of the Regulations states that "The person conducting a public participation process must take into account any relevant guidelines applicable to public participation as contemplated in section 24J of the Act ..." PHSC have not taken these guidelines into account as Section 6 of the guidelines specifically states that:</p>	<p>Email response provided 22 November 2024:</p> <ol style="list-style-type: none"> Hope you are well <p>I acknowledge receipt of your communication and will respond soonest</p> <p><u>EAP responses:</u></p> <ol style="list-style-type: none"> An extension to submit comments was granted until 13 January 2025. Further public participation is planned as outlined in the draft EIAR. The request for a public meeting will be considered. The comments are noted.

		<p>"6. GUIDANCE ON THE LEVEL OF PUBLIC PARTICIPATION: The minimum requirements for public participation outlined in the EIA Regulations will not necessarily be sufficient for all applications. This is because the circumstances of each application are different, and it may be necessary in some situations to incorporate extra steps in the PPP. The table below provides guidance for deciding on the required level of PP."</p> <p>In the table that follows the answer to many of the questions on 'scale of anticipated impacts, public and environmental sensitivity of the project and potentially affected parties' is 'YES', requiring a more extensive public participation process, not 'No' requiring that Minimum requirements be met.</p> <p>4. The complex nature of public participation in our community is evident. The EAP has opted for an Open House format, with no record of the questions asked or the answers supplied, even though the Guidelines promote a Public Meeting for special/marginalized communities.</p> <p>5. The JCF requested an extension of the PPP until after the Christmas break with a public meeting (not an Open House) scheduled for mid January. This request was denied, citing NEMA timeframes as the reason. However, NEMA allows for a 50 day extension of the 106 days from Acceptance of Scoping Report to submission of EIAR. This has been referred to in all the draft documents circulated and in presentations at public meetings. The complex nature of PP and the volume of reports requiring comment surely provides motivation for a 50 day extension. Since there are currently only 7 days allocated from close of comments on 2nd round PP (14 Feb 2025) and Final submission of EIAR (21 Feb 2025) it is anticipated that PHSC will apply for the extra 50 days for them to finalise the documents. This extra 50 days, according to the PHSC diagram, should however be divided between PP (30 days) and Incorporation of PPP comments (20 days; CWA-draft-EIA-12-Nov-24 pg 59). A 50 day extension will take the process to 14 April (13 April is a Sunday), sufficient time to extend the 1st PPP to 17 Jan 2025, Incorporation of 1st round comments to 13 Feb 2025, 2nd round PPP 14 Feb to 17 Mar 2025 and Incorporation of 2nd round comments to 14 April 2025, and Final EIAR Submission 14 April 2025.</p> <p>6. Although the pre-application notices were circulated in English, Afrikaans and isiXhosa, it appears as though subsequent notices were only in English. Some consultation meetings included isiXhosa translators but no mention is made</p>	<p>4. Response: A public meeting was held on 8 May 2024. The Open day format was chosen as it allows IAPs to interact unrestricted with specialists and to obtain additional information on their specific query.</p> <p>5. The comments are noted. The 50 days allowed for can only be used when there is new information to be shared with IAPs. The EAP will only consider the request for extension of timeframe to DEA&DP if this situation arises.</p> <p>6. Response: Meetings conducted were in English, with isiXhosa and Afrikaans translation facilities available.</p>
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		<p>of whether the meetings were conducted in English or Afrikaans, and if other translation facilities were available. The JCF have 1 requested documentation in Afrikaans and have been informed that only English is available. This is contrary to the Guidelines, which state that “Appropriate participation measures can be put in place to deal with the range of cultural and language requirements of RI&APs. The language used by the RI&APs must be taken into account when serving a notice and when selecting a newspaper. Note: Where environmental reporting is done in one of the three regional languages, executive summaries in the other two languages should be made available, on request.” Executive summaries in Afrikaans and isiXhosa should be made available on request.</p> <p>7. Since I am currently on leave in Beaufort West, a trip planned far in advance, I wish to tender my apologies for the Public Open Day tomorrow, 20 November 2024.</p> <p>Email dated 22 November 2024:</p> <p>8. Apologies for the incorrect spelling of your name in the email sent on 19 November 2024. Please acknowledge receipt of the email and advise on the way forward with respect to timelines.</p> <p>Email reply dated 26 November 2024:</p> <p>9. I will most likely be commenting as an individual and possibly on behalf of the JCF.</p> <p>My apologies, the request for extension came from Susan Rheeder (The Pearly Trust). Susan Rheeder is a member of the JCF EXCO so her comments are also on behalf of the JCF. See copies of emails below [Please refer to comment 280 for the emails referred to].</p>	<p>Response: The request for executive summaries to be made available in Afrikaans and isiXosa on request will be considered for the next round of PPP. This request has not been raised by JCF before. All communication and comments received from JCF to date has been in English.</p> <p>7. Noted</p> <p>Email communication from EAP dated 26 November 2024:</p> <p>8. Please clarify for me whether you will be commenting on behalf of JCF.</p> <p>Also please provide clarity on the statement <i>The JCF requested an extension of the PPP until after the Christmas break with a public meeting (not an Open House) scheduled for mid January. This request was denied, citing NEMA timeframes as the reason.</i> I do not have record of a request by JCF for extension and would appreciate assistance with this.</p> <p>Email response provided 27 November 2024:</p> <p>9. Thank you for the email.</p> <p>I grant you extension for comment until 13 January 2025.</p> <p>I have clarified telephonically with Susan that the below communication was sent in her capacity as representative for The Pearly Trust.</p>
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		<p>Email dated 13 January 2025:</p> <p>Unfortunately owing to total burnout and ill health I have been unable to read the Draft EIAR or any of the documents related to my objections. I will hopefully be able to comment more extensively during the second round of public participation on the Draft EIAR. Please accept the following brief comments, in conjunction with previous comments regarding the PPP submitted in December 2024.</p> <p>1. As a resident of Joostenbergvlakte I object to the inclusion of the proposed Lucullus Road Extension and upgrade as potential access between CWA and the N1. Both the initial process to get City approval to proceed with Future Road Infrastructure Planning for Lucullus Road upgrade, and the EIA process for the Lucullus Road extension, appear to have stalled. The identification of Lucullus Road Extension as being part of the future road network plan makes no mention of the fact that it is designated 'potential' and not all potential roads will be implemented. The upgrade & extension of Lucullus Road will bisect the small holding community and pave the way for the total loss of rural and agriculturally zoned properties in favour of Mixed Use Industrial Zoning. As a resident of Joostenbergvlakte for 33 years, who bought into this community for the rural sense of place, this is totally unacceptable, hence my objection. There is sufficient access via the R304 and the R312 to Wellington/Klipheuwel/Okavango Road and the proposed extension of the R300.</p>	<p>1. Response from ITS: The Lucullus Road extension is only assessed for the ultimate scenario when the airport would be fully developed and is not a requirement to accommodate the airport's first phase. The assignment of future development traffic (not only the airport but also other background developments in the area) is done in response to the City's approved Public Right-of-Way Road Hierarchy network which includes the Lucullus Road extension. However, it is agreed that airport traffic is likely to use the R304 and R300 to connect to the N1 in future.</p>

		<p>2. The Freshwater Assessment and Wetland Offset Report were based on 2 site visits, 17 Jan 2022 and 25 April 2022, in the summer and autumn of a below average rainfall year. The lack of a wet season assessment is acknowledged to be a limitation of the study and a wet season assessment should be done before conclusions on delineation, sensitivity, impacts and offset can be made.</p> <p>3. The Wetland Offset Report has a glaring flaw. An offset is supposed to mitigate wetland loss so there is no nett loss of Wetlands. The proposal to Offset the loss of 7.44ha of Wetland Seep (designated Critical Ecological Support Area and Aquatic Biodiversity Sensitivity - Very High), with 3.68ha of Wetland Seep and 36.2ha of CVB Wetland, cannot be termed no nett loss as the offset sites are already wetlands. An offset should be the creation of a NEW wetland with the extent (7.44ha), characteristics and functioning of the wetland to be lost, not the rehabilitation of an existing wetland. Expanding the remaining 3.68 ha of seep by 7.44 ha, will allow you to claim no nett loss of wetlands, but as it stands there will be a loss of 7.44ha of Wetland Seep.</p>	<p>2. Response from FEN: As indicated in the freshwater report, although the site surveys for the freshwater investigation were undertaken in the Western Cape summer and autumn season, the site conditions at the time of the field assessment were considered acceptable to reach appropriate conclusions with an acceptable level of accuracy. An additional field assessment was undertaken for the offset investigation in April 2024 during which some of the wetlands associated with the study area were again field verified and the condition thereof assessed. The 2024 field assessment confirmed the condition of the wetlands, these being largely to seriously modified with limited ecological importance and sensitivity and ecoservice provision.</p> <p>3. Response from FEN: Creation of wetland habitat may not necessarily meet the Like-for-Like Principle. The National Biodiversity Offset Guidelines (2023) and the Wetland Offset Guidelines (2014) advocate for offsets to be as similar as possible to the type, functioning, and ecological significance of the impacted wetland. If a wetland is lost, the offset should ideally involve the creation or rehabilitation of a wetland with the same hydro-geomorphic type (e.g., seep wetland) and functionality. Wetlands cannot be constructed where there are no wetland drivers (particularly hydrological, geomorphological and geological drivers). In addition, constructing wetlands to offset wetland loss is not sustainable in the long term as the drivers need to be maintained in perpetuity. According to the Guidelines, rehabilitation (restoring degraded wetlands to their original functionality) is preferred over creation (establishing a wetland in a location where one did not historically exist). The guidelines acknowledge that wetland creation is challenging, costly, and often less successful, as it requires replicating complex hydrological, soil, and ecological conditions. Given the practical and regulatory challenges, wetland creation is often not feasible, especially when it entails: 1) altering terrestrial habitat, which could require additional permitting under NEMA and other environmental laws (if not also triggering the need for terrestrial biodiversity offsets), 2) addressing significant hydrological changes to sustain a created wetland, and 3) ensuring long-term ecological success, which can be unpredictable. Transforming terrestrial habitat into wetland is generally discouraged because it leads to the loss</p>
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			<p>of terrestrial biodiversity and ecosystem services and/or it can often trigger additional environmental approvals, such as EA, which complicates the process.</p> <p>As indicated in the offset report, as wetland offsets are implemented to address significant residual impacts resulting from development projects (after appropriate avoidance, minimization, and rehabilitation measures have been considered), it is essential to quantify the residual impacts associated with development activities. The best-practice wetland offset guidelines (SANBI and DWS, 2016) suggest that particular key components (i.e. water resources and ecosystem services, ecosystem/habitat conservation and species of conservation concern) be evaluated when assessing residual impacts. For the purposes of the residual impact assessment associated with this project, all wetland losses were converted into functional hectare equivalents and habitat hectare equivalents to determine how large of a wetland area (in terms of its functionality and ecosystem conservation) is required to be offset to ensure that no wetland functionality and habitat loss. Wetland offset targets for two of the three residual impact categories were calculated using wetland offset target calculators developed as part of the National Wetland Offsets Guideline (SANBI and DWS, 2016) as well as the Wet-EcoServices (Version 2) tool (Kotze et al., 2020). The methodology is further elaborated on in Appendix F of the offset report. The meeting of functional (regulating ecosystem services) targets requires a gain in wetland functionality through the rehabilitation and management of a degraded site or a site under threat before protection is considered (SANBI and DWS, 2016). Functional offset targets are typically achieved through the following means:</p> <ul style="list-style-type: none"> • Rehabilitation actions / interventions that reinstate ecosystem functioning and integrity and the processes to drive the supply of regulating services; • Actions that avert the loss of a wetland that is likely to degrade in the future (i.e. a headcut is migrating upstream through a wetland) (referred to as averted loss’); and/or
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- The creation of a new artificial wetland referred to as 'establishment'.

Various onsite and offsite candidate sites were screened on a desktop level using particular selection criteria. During the offset investigation it was determined that rehabilitating only the remainder of the seep wetland (3.68 ha) will not be sufficient to achieve the wetland functionality and ecosystem conservation targets. A channelled valley bottom (CVB) wetland which is fed by the seep wetland via an agricultural drain was therefore also investigated to achieve the offset target. Using the offset calculator tool, as indicated in the below table, offsetting, through the rehabilitation of, the remainder of the seep wetland as well as a portion of the CVB wetland will result in a gain in wetland functionality and ecosystem conservation (in terms of habitat equivalents). This will be achieved by rehabilitating ~40 ha of wetland habitat (seep wetland and CVB wetland combined).

	Wetland offset target (HaE)	Proposed offset area (HaE)	Final offset contribution (ha)*		Comments
			Seep wetland	CVB wetland	
Wetland functionality (HaE)	3.97	4.1 (0.3+3.8)	3.68	36.2	Offset contribution exceeds as what is required by the offset target
Ecosystem Conservation (HaE)	13.0	30.5 (2.8+27.7)			Offset contribution exceeds what is required by the offset target
Species Conservation (HaE)	-	-			Not assessed, however the biodiversity offset along with the wetland offset is regarded as appropriate to address species loss.

* The final offset contribution is the sum of the offset contribution of the respective wetlands, therefore equating to ~40 ha.

4. On page 289 of the DEIAR it states: "Conservation significance of the study area: The results of the online National Web-Based Environmental Screening Tool (2023) indicate the Terrestrial Biodiversity Sensitivity Theme for the study to be of very high sensitivity due to 'the presence of CBA 1's, CBA 2's, critically endangered ecosystems, and an endangered ecosystem'.

4. Response from Nick Helme Botanical Surveys:

Whilst the web-based Screening Tool provides a useful initial sensitivity guide it is very broad scale (Km scale), operating primarily at the level of Vegetation Type and Ecosystem Sensitivity level, which are the two key elements informing the Screening Tool mapping (CBAs use these as their base layers

		<p>The National Web-Based Environmental Screening Tool (2023) also indicates that the Animal Species Theme for the southern parts of the study area was of high sensitivity whereas the remainder of the study area was of medium sensitivity, and several SCC potentially utilise the study area on a permanent or temporary basis."</p> <p>Surely these areas should be development exclusion zones to prevent unmitigable impacts on biodiversity.</p>	<p>too). In all proposed projects there is thus a requirement for fine tuning, ideally based on ground truthing, and this has been the case for this project from the outset, with detailed botanical site sensitivity mapping have been undertaken, accurate to within less than 5m. It was thus determined that there are indeed small but important remnants of Endangered and Critically Endangered ecosystems (and CBAs) within the overall project area, and unfortunately others fell unavoidably (due to geometric layout considerations of runway, etc) within the proposed development footprints, whilst other remnants are outside the development footprints. Obviously it would be ideal if all such remnants could be excluded from the development footprints, but this is simply not possible given the project at hand, and the Mitigation Hierarchy was carefully followed – being 1) Avoidance 2) Minimisation of Impact and 3) Mitigation of Impact, where the first two steps were not fully possible. In many cases mapped areas of CBA1 and Endangered and Critically Endangered ecosystems proved to be badly degraded, with little rehabilitation potential, and on balance it is felt that the development layout, including all mitigation and the required biodiversity offset will not result in an unacceptably high level of botanical loss on this site.</p> <p>Response from SAS:</p> <p>It is important to note that the National Screening Tool is used as a tool to guide specialists and EAPs as to potential sensitivity of areas during the initial screening phases of a project. The sensitivities indicated by the screening tool have to be ground truthed by a specialist on site. Where the sensitivities of a medium, high or very high are confirmed, the full reporting protocol is to be followed. However, where a low sensitivity is confirmed, a compliance statement can be submitted.</p> <p>The National Screening tool indicated that the study area has a high sensitivity for Circus ranivorus (African Marsh Harrier), Circus maurus (Black harrier) and Sagittarius serpentarius (Secretarybird). During the site assessment, none of these species were observed on site, and given the degree of habitat disturbance that has already occurred, breeding of these species within this area is unlikely. These species however may forage periodically within the study area (Avifaunal report, Part C section 3). Based on the ground truthing</p>
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		<p>5. Thank you for the opportunity to comment on the DEIAR for CWA. I reserve the right to send additional comments on future Drafts of the EIAR.</p> <p>Thank you for your kind cooperation in this matter.</p> <p>Please acknowledge receipt of this email.</p>	<p>of the site, the high sensitivity as indicated by the screening tool in the south of the study area was not confirmed, and lower sensitivity rather assigned to these areas. Based on this, no development exclusions have been recommended or are required as per the species assessment guideline. Mitigation measures are however required to manage impacts, which are included in the report.</p> <p>Similarly, the screening tool indicated a medium sensitivity for <i>Hydroprogne caspia</i> (Caspian Tern), <i>Afrotis afra</i> (Southern Black Korhaan), <i>Circus ranivorus</i> (African Marsh Harrier), <i>Circus maurus</i> (Black harrier), <i>Aneuryphymus montanus</i> (Yellow-winged Agile Grasshopper), <i>Conocephalus peringueyi</i> (Peringuey's Meadow Katydid) and <i>Bullacris obliqua</i> (Bladder Grasshopper). None of these species are expected to occur within the study area due to habitat disturbances.</p> <p>5. Noted</p>
306	Guy Gibbon - Africana Engineering	<p>Email dated 20 November 2024:</p> <p>1. All the best with your open day today! Sorry I could make it still busy in Zambia! Anyway you have our support from Africana Engineering and believe having this morning perused your EIA doc that the project should proceed with no real obstacles to the cause. Having been personally involved with KSIA in Durban EIA and more lately Gulfstream Bulk Storage in Lusaka which have progressed now past the EIA stage it is a lengthy but rewarding process to see the progress made to project realization. Please keep us in the loop</p>	<p>Email response provided 21 November 2024:</p> <p>1. As a registered I&AP you will continue to be notified of the progress of the EIA during the process.</p>

<p>307 & 341</p>	<p>Celine Oates - RICHARD SUMMERS INC. on behalf of Garden Cities NPC (RF)</p>	<p>Email dated 20 November 2024:</p> <ol style="list-style-type: none"> 1. We act on behalf of Garden Cities NPC (RF), an interested and affected party to the above matter. <p>Kindly see the attached correspondence for your attention. Kindly confirm receipt hereof.</p> <p>We look forward to hearing back from you at your earliest convenience.</p> <p>Letter received via email dated 20 November 2024:</p> <ol style="list-style-type: none"> 2. We act on behalf Garden Cities NPC (RF). 3. On 13 November 2024 our client received an advertisement in which you notified interested and affected parties ('I&APs') of the current 30-day period for I&APs to review and comment on the abovementioned Draft Environmental Impact Assessment Report and associated appendices (Appendices 1 to 47). This commenting period would run until 13 December 2024. We request additional time for the commenting period and associated public participation process for the reasons set out below: 4. The documentation provided to I&APs is voluminous and in excess of 6000 pages inclusive of appendices, all of which will need to be reviewed in order for I&APs to meaningfully comment on the abovementioned reports and to enable engagement in the scoping and environmental impact assessment process in a manner that is fair, meaningful and promotes the right to administrative justice enshrined in section 33 of the Constitution of the Republic of South Africa, 1996. 	<p>NOTE: Regular and ongoing engagements are underway between CWA and the IAP, progressed to a point where CWA made a formal offer, subject to Board approval, on acquisition and/or land swaps for land directly affected by noise i.e. 55dBa and higher. Offer was made by CWA on 25 February 2025, offer is currently under consideration by the Garden Cities Board, a response is awaited and is expected before the end of March 2025.</p> <p>Email response provided 26 November 2024:</p> <ol style="list-style-type: none"> 1. Thank you for the communication. I take note of your attached letter and the contents thereof. <p>2 to 9. EAP response: Please note your statement - <i>For instance, the Scoping EIA followed a similar pattern, with notifications sent out on November 7, 2023, and the commenting period closing on December 8, 2023</i> is incomplete. It needs to be noted that it was the draft pre-application Scoping report that you are referring to that was circulated for comment from 8 November up to and inclusive of 8 December 2023. The document remained on our website and in the public domain until 23 July 2024, whereby we received numerous late comments and registrations which were included in the C&R. We conducted a Public Open meeting on 8 May 2024 at Fisantekraal Library. Thereafter the draft in-process Scoping report was circulated for comment from 24 July up to and inclusive of 26 August 2024. Your client commented and participated during all these periods. Further to this the Applicant engaged with your client directly on numerous occasions and this engagement is ongoing. Also note that this is not the last round of public and authority consultation - as per section 10.4 in the draft EIA Report another 30 days will be conducted early 2025.</p>
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		<p>5. Advertising the above voluminous documents for the bare minimum period of 30 days for the public to comment in these circumstances is inappropriate, unreasonable and unjust.</p> <p>6. Limiting the commenting period to 30 days only flies in the face of procedural fairness and offends our client’s right to administrative justice.</p> <p>7. We therefore request an additional 30 days over and above the comment period advertised (i.e. a total of a 60-day commenting period) which would expire on 3 February 2024 in order to facilitate meaningful public engagement.¹</p> <p>8. Our client finds it deeply concerning that the Applicant consistently chooses to release notifications for these processes during the most demanding time of the year. This period, marked by the year-end pressures faced by developers, builders, contractors, suppliers, and various other stakeholders, leaves little opportunity for a thorough review and response to the extensive information provided. For instance, the Scoping EIA followed a similar pattern, with notifications sent out on November 7, 2023, and the commenting period closing on December 8, 2023. This practice places undue pressure on affected parties and significantly limits the ability for comprehensive review and feedback. Our client considers this approach to be both unreasonable and in bad faith, as it undermines the principle of fair and inclusive stakeholder engagement. The period should possibly be extended to a 90-day period should the applicant and EAP be adamant to run each engagement during the end of the year</p> <p>9. We look forward to hearing from you.</p> <p>Email dated 22 November 2024:</p> <p>10. With reference to the above matter and below correspondence. Kindly confirm receipt hereof. We look forward to your response.</p>	<p>As you are aware we are currently busy with the in-process EIA phase that is regulated as per the NEMA Regulations, therefore we don’t have the luxury to merely provide extensions that will compromise the stipulated timeframes. However, we can offer you an extension until COB on Monday 13 January 2025.</p> <p>Email response provided 22 November 2024:</p> <p>10. Thank you for the email. I acknowledge receipt and will respond soonest.</p>
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		<p>Email dated 26 November 2024:</p> <p>11. With reference to the above matter and below correspondence. Kindly respond to the content of the letter at your earliest convenience.</p>	<p>Email response provided 26 November 2024:</p> <p>11. I have responded to your original email. Please confirm receipt</p>
		<p>Email dated 13 January 2025:</p> <p>1. We act on behalf of Garden Cities NPC (RF).</p> <p>With reference to the above matter. Please see attached hereto the following:</p> <ul style="list-style-type: none"> • RSInc Preliminary Comments on the CWA Draft Environmental Impact Assessment Report dated 13 January 2025; • Annexures A-F. <p>We shall be most grateful if you would confirm receipt hereof.</p>	<p>Email response provided 13 January 2025:</p> <p>1. Thank you for the email and the comments and annexures received</p>
		<p>Letter received via email dated 13 January 2025:</p> <p>INTRODUCTION</p> <p>1. We act on behalf of Garden Cities NPC (RF) hereafter referred to as “Garden Cities”.</p> <p>2. These comments are submitted on behalf of Garden Cities in connection with the Draft Environmental Impact Assessment Report (“DEIAR) for the Proposed Expansion of the Cape Winelands Airport, dated 12 November 2024 and prepared by PHS Consulting.</p> <p>RESPONSES TO PREVIOUS ROUND OF COMMENTING</p> <p>3. Garden Cities participated in the previous round of commenting, as evident in the Comment and Response Report dated October 2024 (“CRR”) and in the letter attached hereto as Annexure A. Various responses by the environmental</p>	<p>1. Noted</p> <p>2. Noted</p> <p>3. Noted</p>

		<p>assessment practitioner (“EAP”) to the comments submitted by Garden Cities in the previous round warrant further response from Garden Cities, which are detailed below.</p> <p>4. EAP response on page 147 of the CRR: “CWA is fully dedicated to establishing a strong and collaborative partnership with Garden Cities, as demonstrated by our extensive engagements over the last four years”.</p> <p>4.1. Garden Cities comment: Although CWA emphasises a strong collaborative partnership with Garden Cities, it is important to clarify that the engagement with Garden Cities on a few occasions does not imply that CWA has been transparent in the sharing of pertinent information that would allow Garden Cities to engage with CWA in a comprehensive and meaningful manner at all stages of the process. The restriction on information placed before Garden Cities has had significant implications for the Greenville Garden Cities development (“Greenville Development”) which encompasses the environmental impact assessment (“EIA”) process and the initial three phases of the development which have been meticulously planned and executed with macro planning, Acknowledgements of Debt for Development Contributions as well as various overarching funding and approvals already secured from, inter alia, the Western Cape Province and the City of Cape Town. CWA persistently downplaying and challenging the multifaceted and multipurpose Greenville development – supported by an approved EIA, Concept Plan (attached hereto as Annexure B) and accompanying documentation – does not reflect collaboration. Instead, it emphasises the CWA’s narrow pursuit of personal interests and a one-sided approach.</p>	<p>4. CWA Response:</p> <p>In an effort to maximise the potential of the Greenville Development and CWA’s Development, CWA is committed to collaborating with Garden Cities. Both of these developments have the potential to positively impact and transform the Fisantekraal area and its surrounds. A tremendous opportunity exists for integrated planning, creating spaces where people not only live, but have easy access to employment. Thoughtful commercial/industrial planning can lead to changing socio-economic conditions. Ultimately, integrated planning and a collaborative approach can yield immense benefits for Garden Cities, CWA, the communities and the region.</p> <p>4.1 Key Points of the comment:</p> <p>Garden Cities' comment highlights several key objections to CWA’s approach and claims of collaboration.</p> <p>Perceived Lack of Transparency:</p> <p>Garden Cities states that while CWA claims to emphasize collaboration, CWA has not been transparent in sharing pertinent information and that this lack of information sharing has hindered Garden Cities' ability to engage meaningfully and comprehensively throughout the process.</p> <p>Process is as important as outcome. CWA has followed the process prescribed in statute and lead provided by the independent EAP meticulously; this compliance with the prescribed process has, on occasions, resulted in frustrations on the part of Garden Cities.</p> <p>CWA is compelled to address Garden Cities’ (GC) comments regarding transparency and collaboration, as outlined in this recent objection. The assertion that engagement has occurred only “on a few occasions,” coupled with accusations of information restriction, is not only inaccurate but dismissive of CWA’s significant and documented efforts to foster collaboration (all of which can be shared if required).</p>
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			<p>CWA initiated a number of meetings with the Garden Cities Leadership including the Garden Cities Board of Directors. The tone of this initial meeting was positive, the spirit and intent of a future collaborative relationship was agreed where both parties would work hard to secure a solution/s for the two developments to co-exist in harmony. Since that initial engagement with the Garden Cities Board, a number of meetings have been convened; these meetings were initiated by CWA. During and in between these engagements, CWA has ensured that it shares and communicate all pertinent and relevant information, doing so with the intention of playing its part in developing a relationship of trust and better cooperation.</p> <p>Volume of Engagements</p> <p>The claim that there has been limited engagement is contradicted by the record:</p> <p>Since April 7, 2020, coming up for 5 years now there have been in excess of 100 documented interactions, including:</p> <p>60 emails, often with presentations attached, have been initiated by CWA, reflecting consistent effort to engage GC, many with attachments reflecting opportunities to work together.</p> <p>38 emails from GC, in response to requests initiated by CWA</p> <p>13 in-person meetings, all at GC offices, indicating CWA’s willingness to collaborate</p> <p>1 online meeting,</p> <p>Transparency in Information Sharing</p> <p>CWA has provided extensive information to GC throughout this process, within these broad themes:</p> <ul style="list-style-type: none"> • A detailed overview/ scope of the project • Details on the phased development approach. • Regular updates on planning and timelines. • Commercial partnership opportunities to minimise the potential impacts on
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			<p>By way of examples, here is a snapshot and summary of 4 of the meetings held with Garden Cities:</p> <ul style="list-style-type: none">• 1 Feb 2022 – Presentation to the Garden Cities Board of Directors<ul style="list-style-type: none">○ Intro the team and project○ The evolution of airports, the Aerotropolis○ Socio economic benefits of airports aligned to the National Airport Development Plan○ A global perspective of airports○ Strategic location of CWA○ Embedding sustainability○ Details of the airport’s expansion<ul style="list-style-type: none">• CWA status quo and current operations• Airspace operations• Rail access to CWA• CWA Land Use Plan<ul style="list-style-type: none">• Macro Phasing• Current and future airport users• Evolution of Spatial Development Plan• Proposed expansion timelines• Artist Impressions• 19 February 2023 – CWA Update to Garden Cities CEO and Group Manager Engineering and Planning:<ul style="list-style-type: none">○ CWA Development Update’<ul style="list-style-type: none">• Current Spatial Development Plan
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			<ul style="list-style-type: none"> • Overview of Aeronautical and Non-Aeronautical Infrastructure • Aeronautical infrastructure overview (runway alignment and length) • Development Timelines • Discussed potential opportunities between CWA and GC • 31 August 2023 – CWA Update session to Garden Cities Group Manager Engineering and Planning and Garden Cities Consultants: <ul style="list-style-type: none"> ○ Key Design Parameters ○ Land Use Plan ○ Airport Master Plan and Phasing ○ Airport City Overview <ul style="list-style-type: none"> • Terminal Precinct • General Aviation Precinct • Road network and access <ul style="list-style-type: none"> • Passenger and goods flow • Passenger access • Service and cargo access • General Access • Airport road system ○ Anticipated socio-economic benefits ○ Alignment to National Airport Development Plan ○ CWA Value Proposition ○ Discussed potential opportunities between CWA and GC
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			<ul style="list-style-type: none"> ○ Discussed potential impacts (noise and height restrictions) – at this stage the Noise Impact Assessment was not available yet ● 21 November 2023 – CWA Update to the Garden Cities Board Investment Committee: <ul style="list-style-type: none"> ○ Project Update <ul style="list-style-type: none"> ● Activities completed to date: <ul style="list-style-type: none"> ● Team & Consultant Appointments ● Land Acquisitions ● Industry Engagements ● Master Plan – by Netherlands Airport Consultants (NACO) ● Runway Concept Design ● Airspace Concept of Operations ● Airspace Working Groups Formed ● Environmental Baseline Studies ● In-Progress activities: <ul style="list-style-type: none"> ● EIA Scoping (November 2023) ● Rezoning ● Existing Aerodrome License Upgrade ● Airspace Design ● Terminal Design ○ CWA Land Use Plan ○ Details of the Proposed Expansion <ul style="list-style-type: none"> ● Traffic Forecast
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			<ul style="list-style-type: none"> • Key Markets Served • Airport Design Parameters ○ Overview of CWA’s Value Proposition <ul style="list-style-type: none"> • Airline Capacity • General Aviation Capacity • Redundancy • Fuel Planning Optimisation • Positive Environmental Impact • Improved Air Access • Affordability and Accessibility • Socio Economic Growth ○ Airport Master Plan and Phasing <ul style="list-style-type: none"> • Road network planning ○ Garden Cities Anticipated Impacts and Proposed Opportunities <ul style="list-style-type: none"> • Discussed potential negative impacts (noise, height restrictions) • Discussed potential benefits (employment opportunities for GC communities, accelerated demand for industrial / light business) • Discussed potential opportunities (joint ventures between CWA and GC) <p>CWA and the Greenville Developments: CWA has consistently acted in good faith and shown a commitment to collaboration to align its plans with the Greenville Development.</p>
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			<p>The characterisation of CWA as “downplaying and challenging” the Greenville Development is inaccurate and unfair. As is explained above, CWA has proactively proposed collaborative opportunities for GC’s consideration and has diligently considered its concerns to help ensure the coexistence of both developments in a way that maximises mutual benefits and minimizes conflict.</p> <p>CWA refutes the allegations of an absence of transparency or collaboration. The documented history of engagement clearly demonstrates the lengths to which CWA has gone to work with GC over the past five years. CWA encourages GC to recognise the significant efforts made to date and to engage in a manner that prioritizes mutual progress and constructive dialogue.</p> <p>As explained above, CWA initiated meetings with the Garden Cities’ Leadership as far back as April 2020, with a first meeting on the 7th of April 2020. In person meetings were held with Garden Cities on the following dates, where an on average number of 6 people from both sides attending:</p> <ul style="list-style-type: none">• 2021-08-02• 2022-02-01 (Meeting with the full board of Garden Cities)• 2022-03-04• 2023-02-07• 2023-02-19• 2023-03-09• 2023-10-20• 2023-11-15• 2023-11-21• 2024-06-18• 2024-07-03• 2024-08-21• 2024-12-12 <p>During and in between these engagements, CWA has ensured that it shares and communicates all pertinent and relevant information, in keeping with the</p>
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			<p>regulatory process, doing so with the intention of playing its part in developing a relationship of trust and better cooperation. CWA acknowledges GC's frustration regarding obtaining the noise cones. This is the one piece of information that GC has consistently requested. This information became available as part of the Impact Assessment Phase.</p> <p>In terms of the broader perspective, infrastructure development, particularly at the scale of both CWA and the Greenville Development, demands adaptability and mutual understanding. While CWA recognizes the importance of GC's plans, it is crucial that both parties work together to address overlapping opportunities, environmental considerations, and community impacts.</p> <p>Perceived Impact on Greenville Development:</p> <p>Garden Cities claims the restriction on information has had significant implications for the Greenville Development, which has been "meticulously planned with macro-level considerations, secured funding, and necessary approvals".</p> <p>Garden Cities are clear that their EIA process and "the initial three phases" of the Greenville Development have already been approved and are underway, yet Garden Cities is being challenged or undermined by CWA.</p> <p>CWA's Response:</p> <p>From a noise perspective, the expansion of CWA has no impact on the Phases/Parcels 1-3.</p> <p>Phase/Parcel 4 rights have expired.</p> <p>Phase/Parcels 5-7 are conceptual.</p> <p>Perceived undermining of Existing Approvals and Plans:</p> <p>Garden Cities notes that the Greenville Development is supported by an approved EIA, "concept plans, and other documentation".</p> <p>Garden Cities view CWA's actions as dismissive or undermining of these established plans and approvals.</p> <p>CWA's Response:</p>
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			<p>The rezoning of Greenville was approved on the 7th of December 2012. The City of Cape Town advised on the 7th of June 2022 when CWA requested a zoning certificate, that the rights on Erf 4 had lapsed and the property reverted back to agricultural. The planning legislation, LUPO (applicable in 2012) and the MPBL applicable now), allows for an initial period of 5 years on which to use the rights with one further extension of another 5 years. If after 10 years the developer has failed to act on the rights, they lapse.</p> <p>Conflict with Collaborative Claims:</p> <p>CWA's actions, as described by Garden Cities, are seen as inconsistent with their stated commitment to a collaborative partnership.</p> <p>Garden Cities believe that CWA is challenging the Greenville Development's Multifaceted Purpose:</p> <p>Garden Cities contends that CWA has persistently downplayed and challenged the Greenville Development, which is characterized as a multifaceted and multipurpose project.</p> <p>This suggests a lack of recognition by CWA of the broader implications and benefits of the Greenville project.</p> <p>CWA recognises Garden Cities, its role and mandate and consider that to be crucial in building successful and transformed cities and spaces where people can live, work, play and learn, all in close proximity without having the need to spend large amounts of time and income travelling between those spaces. CWA recognises and fully respects the history of work conducted on the Greenville Development, the EIA conducted at the time, subsequent planning and rights approved at the time i.e. some 10 years ago.</p> <p>The Greenville development, without the establishment of CWA, faces a significant risk of becoming a dormitory establishment—a residential area where the majority of inhabitants live but do not work locally. Such areas are often characterized by limited economic activity, with few or no job opportunities within the community itself. This results in a pattern where residents are forced to commute long distances to access employment, creating a host of socio-economic challenges.</p>
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			<p>The Socio Economic Impact study conducted for the proposed expansion of Cape Winelands Airport indicates that only “57,33% of the total population residing within 10 km of the site is employed, while 59,61% within 20 km are employed.” The study further indicates that “The project could sustain about 32 433 (direct, indirect, and induced) employment opportunities during construction, including ongoing capital expenditure upgrades over 20 years. This could increase household incomes by R3,8 billion over 22 years. During the initial 20 years of operations, the project could sustain about 102 732 direct, indirect, and induced employment opportunities, adding R17,7 billion in household income.”</p> <p>A dormitory establishment also often lacks the infrastructure and amenities that support a thriving local economy, such as industrial, commercial, and service sectors. This can lead to a stagnant local economy, minimal investment, and reduced opportunities for upward mobility among residents. Additionally, it can strain transportation systems as large numbers of people commute to work elsewhere, contributing to congestion, increased travel costs, and environmental impacts.</p> <p>The absence of CWA—a catalytic infrastructure project designed to drive regional economic growth—compounds this risk. CWA has the potential to stimulate job creation across various sectors, including aviation, logistics, retail, hospitality, and support services. Without this anchor, Greenville may struggle to attract businesses and industries that create sustainable employment. Instead, it could become a community that primarily serves as a residential zone for workers employed elsewhere, undermining its potential to develop into a self-sustaining, vibrant urban node.</p> <p>For Greenville to avoid this outcome, it is crucial for garden Cities to align residential development with economic opportunities. The inclusion of a project like CWA ensures the development is integrated into a broader economic framework, enabling the creation of local jobs, fostering entrepreneurship, and reducing the dependency on external job markets. By ensuring a balance between housing and economic infrastructure, Greenville can become a dynamic, sustainable community rather than a dormitory establishment.</p>
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		<p>5. EAP response on page 149 of the CRR: “CWA and Garden Cities (GC) need to focus on the future and align their efforts with long-term objectives”.</p> <p>5.1. Garden Cities comment: This is precisely what Garden Cities seeks to achieve, however, CWA persistently prioritises their own interests in disregard of the objectives of the Greenville development, the approved Concept Plan, and macro-planning. The Greenville development is a comprehensive, multidisciplinary housing project that currently includes the Breaking New Ground (“BNG”) component, with broader plans to incorporate a range of housing typologies, commercial and community projects, as well as essential educational and other supporting facilities. CWA’s position has unfortunately been for their own interests to take precedence over existing entities, ongoing initiatives and established plans to adapt and adjust to CWA’s uncompromising position. There has been no effort by CWA to consider the exploration of alternative locations, as the current site offers limited value beyond aeronautical rights, a deteriorated airstrip and aging infrastructure with little to no utility.</p>	<p>A successful Greenville Development is not only a priority for Garden Cities, it is an important component to ensure the success of the proposed airport expansion and development. Most of the eventual and future airport staff will be residing in and on the Greenville Development. The development rights Garden Cities initially secured have lapsed after not being taken up over the last 10 years. CWA holds the firm view that the airport development will positively impact the demand criteria for the Greenville Development, so that rights will not lapse again because, it is assumed, slow/sluggish demand for housing in the area.</p> <p>In short, the airport will be a strong multiplier for economic and social development. Successful and transformed cities not only provide people with a place to live, but also spaces where people can live, work, play and learn, all in close proximity without having the need to spend large amounts of time and income travelling between spaces.</p> <p>5. Response from CWA:</p> <p>Now, based on the noise specialist findings and recommendations, we know that the Greenville Development and Airport Development can co-exist, noting limited changes required at a planning level for the area directly South of the runway. The area impacted upon is relatively limited compared to the full development footprint, whilst not suitable for residential this area is still available for development, commercial and light industrial. As the planning by Garden Cities for the Greenville Development always included commercial spaces, the opportunity is there to revise initial planning layouts and still achieve the same outcomes. Again, it is important to keep in mind that the remainder and majority of the Greenville Development remains unaffected by the airport expansion and development.</p> <p>CWA acknowledges Garden Cities’ (GC) commitment to the Greenville development and its comprehensive approach to housing and community upliftment. CWA recognizes and respects the objectives of the Greenville Concept Plan, as well as the significant work that has gone into creating a multidisciplinary, inclusive project.</p>
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			<p>However, CWA must emphasize that its development plans are not intended to undermine or compete with the objectives of Greenville but to complement the broader regional vision for sustainable growth and development. CWA's position has always been grounded in the belief that a balanced and integrated approach is achievable, where both CWA and Greenville can coexist and contribute to the greater good of the community.</p> <p>Regarding the exploration of alternative locations: Please note this is not a greenfields development and is an expansion of an existing airport with existing rights. CWA's decision to pursue this project is the result of a detailed analysis that considered multiple factors, including aeronautical potential, regional connectivity, and alignment with long-term economic and infrastructural goals. While CWA acknowledges that the existing infrastructure has limitations, it also presents significant opportunities for revitalization and enhancement, which will directly benefit the surrounding areas, including Greenville.</p> <p>EAP response:</p> <p>The proposed project is for the expansion of an existing airport with existing rights at this site; the impacts of that expansion are assessed in the EIAR. It is not for the development of a new airport at a greenfields site, therefore there are NO site / location alternatives.</p> <p>CWA Response: CWA remains committed to engaging collaboratively with GC to address specific concerns and identify synergies that can strengthen both projects. CWA believes that through open dialogue and cooperative planning, outcomes can be achieved that respect the integrity of Greenville's objectives while also realizing the substantial benefits of an upgraded airport and its associated developments.</p> <p>CWA proposes, once again, the establishment of a focused working group between CWA and GC to address key areas of concern and identify actionable steps for alignment and mutual benefit. This initiative will ensure that both entities can move forward with clarity and a shared vision for the future of the region.</p> <p>The selection of a site any commercial airport, whether it is the primary or secondary airport, requires adherence to stringent criteria to ensure its</p>
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		<p>6. EAP response on page 150 of the CRR: “CWA is fully committed to building a robust and collaborative partnership with Garden Cities, as evidence by our extensive engagements over the past four years”.</p> <p>6.1. Garden Cities comment: We disagree with this statement, as engagements with CWA are solely focused on their objectives, whilst</p>	<p>operational feasibility and minimal impact on surrounding environments and communities. The site must meet the following conditions:</p> <ul style="list-style-type: none"> • Proximity to the City: The location must be close enough to Cape Town to provide practical access for residents and businesses while serving as a functional alternative to Cape Town International Airport (CTIA). • Distance from Built-up Areas: The site must be sufficiently distant from existing developed areas to avoid undue disruption to communities and existing infrastructure. • Land Requirements: The site must include contiguous land spanning approximately 4.5 kilometres, which the developer either owns or has direct control over. There is simply no point in putting forward alternatives that are not under control of the developer. This land must be relatively flat to accommodate the runway, lighting systems, and runway end safety areas. • Avoidance of Protected Areas: The location must not encroach on protected nature reserves or ecologically sensitive zones. • Airspace Considerations: The site must be situated outside the controlled airspace of Cape Town International Airport to ensure operational safety and compliance with aviation regulations. • Nuclear Safety Zone Exclusion: Specific to Cape Town, the site must be located outside the Koeberg Nuclear Precautionary Action Zone (5 km radius) and the Urgent Protective Action Zone (16 km radius). <p>This EIA is for extension of an existing airport at an existing site with existing rights. No site alternatives exist. The study suggests that no site alternatives exist</p> <p>6. Response from CWA: CWA finds it concerning that Garden Cities is invoking the concept of Apartheid-style land use planning as a provocative device to serve its own interests and create unnecessary tension. This framing is not only inaccurate but also risks undermining the collaborative and inclusive approach that has</p>
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repeatedly ignoring and dismissing the significant impact the proposed airport would have on the Greenville residential development. The potential risks posed by CWA's proposal, particularly the impact of noise cones on the zoning options for Phases 5 and 6 of Greenville, are substantial. These risks include:

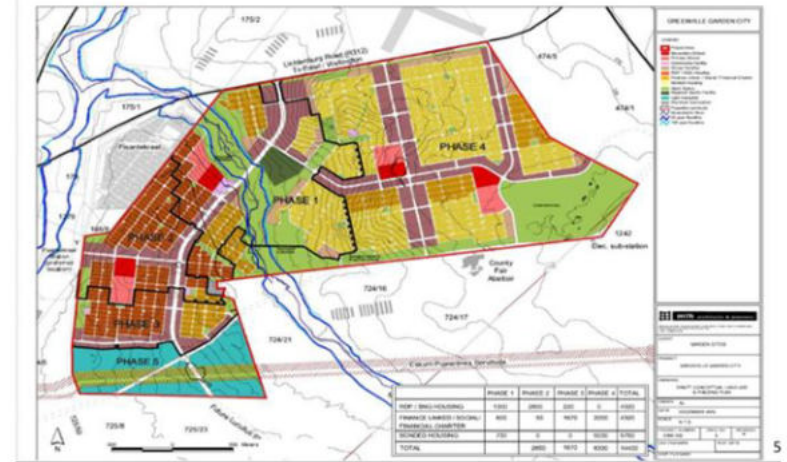
- 6.1.1. The loss of our multidisciplinary and multi-faceted housing development; and
- 6.1.2. The likely outcome of existing BNG housing units—already delivered as part of the Greenville development—becoming surrounded by industrially zoned land. This would result in the poorest and most vulnerable residents being relegated to the least desirable residential area, echoing the inequitable planning principles of the Apartheid era. This outcome is entirely contrary to the inclusive and transformative vision underpinning the Greenville development and is a matter of grave concern to Garden Cities as responsible developers.

defined the CWA development process. As explained above, the development of the CWA will assist in exactly the opposite of apartheid planning, creating work opportunities close to peoples' homes.

See note on 4.1 above which documents clearly the fact that CWA has not only been focussed on its own objectives.

Based on the diagram provided:

It is important to clarify that when Garden Cities refers to "phases," they are referring to specific "parcels" of land planned for future development. In all documentation submitted to CWA or included in objections, there is no mention of a Phase 6. It can be inferred that any future phase or parcel referred to as "Phase 6" would likely be located to the east of Phase 4, where there are currently no submitted development applications. According to the timeline inferred from Garden Cities' response, any potential development in this area would likely occur post-2040. Additionally, it is evident from the diagram that Parcel 5 is located approximately 4 kilometres west of the airport, and as such, CWA will have no direct impact on this parcel.



As previously stated, the City of Cape Town advised on the 7th of June 2022 when CWA requested a zoning certificate, that the rights on Erf 4 had lapsed and the property reverted back to agricultural. The planning legislation, LUPO

		<p>7. EAP response on page 150 of the CRR: “CoCT has confirmed that rezoning and rights on erf 4 have lapsed since the original rezoning. Given these developments, its unproductive to use the current Environmental Authorisation process to debate previously settled matters”.</p> <p>7.1. Garden Cities comment: We respectfully disagree with these responses, as the purpose of an EIA is to ensure that environmental impacts do not negatively affect the environment nor existing land use rights, or are mitigated to a degree to which these impacts are acceptable. CWA is undoubtedly aware of the Greenville multi-billion-rand development, including its comprehensive planning, clear framework, and the prior approvals it has secured. This response is disingenuous, misleading and dismissive. Moreover, we firmly believe that semantics and technicalities should not be used as a basis to undermine or override existing land use rights and established land uses in favour of new applications.</p>	<p>(applicable in 2012) and the MPBL applicable now), allows for an initial period of 5 years on which to use the rights with one further extension of another 5 years. If after 10 years the developer has failed to act on the rights, they lapse. This status is confirmed by the City of Cape Town's Surveyor General zoning viewer and the continued payment of agricultural rates and taxes, indicating no further progress on development rights for this parcel.</p> <p>7. Response from CWA:</p> <p>CWA acknowledges Garden Cities’ response but maintains that the lapse of the development rights for Parcel/Phase 4 is a matter of factual and legal compliance, not merely semantics or technicalities. The purpose of an Environmental Impact Assessment (EIA) process is indeed to evaluate and mitigate environmental impacts to ensure they are acceptable, but this cannot supersede the legal requirements for maintaining and extending land use rights.</p> <p>The rezoning rights for Parcel/Phase 4 were issued in 2012 with a clear condition that subdivision must occur within the stipulated five-year period, extendable by an additional five years. The failure to act within this timeframe has resulted in the lapse of these rights, as confirmed by the City of Cape Town's zoning records and recognised by Garden Cities as they are only paying rates and taxes on agricultural land. While CWA recognizes and respects the significant investment and planning behind the Greenville development, this does not alter the current zoning designation of the land, which remains agricultural.</p> <p>CWA’s position is not to dismiss or undermine existing land use rights but to clarify the current legal status of Parcel/Phase 4, which directly affects the context in which new applications, including CWA’s, are assessed. Compliance with zoning and planning laws is essential to ensure equitable and lawful development, and we encourage all parties to operate within these frameworks to avoid confusion and ensure transparency.</p> <p>Notwithstanding the lapsed rights for the Greenville Development, in an effort to maximise the potential of both developments CWA remains committed to collaborate with Garden Cities. Both of these developments have the potential</p>
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		<p>8.1. Garden Cities comment: There has been no failure to submit. The reality is that developments of this scale cannot be completed within a ten-year timeframe. This is a well recognised issue that has been debated extensively since the introduction of Land Use Planning Ordinance 15 of 1985, the replacement of such with the Spatial Planning and Land Use Management Act 16 of 2013, and the introduction and implementation of the City of Cape Town Municipal Planning By-Law, 2015. All large-scale developers and projects face challenges with this concept, which remains a contentious and widely discussed matter that we have raised with the City of Cape Town. We reiterate our position that this is not a failure on our part but rather a legislative misalignment with the realities of large-scale developments and their phased roll-out. Our Concept Plan approved by the City of Cape Town that outlines all phases of the development, along with the ongoing delivery of bulk and internal services and Land Use Management applications, demonstrates our clear intent and commitment to the entire Greenville development in all its phases —a commitment that CWA appears intent on downplaying and disregarding.</p> <p>9. EAP response on page 152 of the CRR: “Comparing CWA to Cape Town International Airport (CTIA) is not appropriate, as it doesn’t account for the significant differences between the two developments. At CWA we have never claimed to be similar in nature to the CTIA”.</p>	<p>the current zoning designations and processes in place. The lapsing of rights is not a “Concept”, it is a legislated process.</p> <p>8.1. Response from H & A Planning: CWA does not question the intentions that Garden Cities consistently held to develop this land and apologizes if any contrary perception has inadvertently been created. CWA also acknowledges that economic realities do not always align with legislated timelines. However, the fact remains that the previous rezoning approval for Erf 4 Greenville has lapsed.</p> <p>The underlying reason for the “use it or lose it” principle in land-use legislation is founded on the reality that circumstances do change over time, requiring authorities to re-evaluate future applications without being constrained by outdated approvals based on conditions that may no longer exist.</p> <p>9. Response from CWA:</p> <p>CWA acknowledges GC’s concerns regarding statements in media publications comparing CWA to Cape Town International Airport (CTIA) and would like to clarify that such references, including those by Director Nick Ferguson, were intended to highlight CWA’s unique potential to address unmet aviation needs, not to equate it with CTIA in scale or purpose. Media framing often draws comparisons for relatability. The specific comment that CWA was “never similar in nature to CTIA” referred to the context of noise cones only, i.e. one can’t overlay the noise cones of CTIA and say that CWA will be the same.</p> <p>Naturally, as both are airports, they share similar characteristics.</p>
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		<p>9.1. Garden Cities comment: We disagree with your response as numerous statements have repeatedly been made on various social media platforms drawing comparisons between the proposed CWA and CTIA. For example, in a Getaway article leading Director Nick Ferguson indicated “plans to develop the Cape Town Winelands Airport include an ambitious R7-billion expansion, featuring a Code F runway spanning 3,500m to accommodate large aircraft that aren’t accommodated at Cape Town International, such as the Airbus A380”. Similar comparisons have been made in Business Tech, Cape Business News, Engineering News, News24, IOL and Cape Town Etc articles. In light of these statements, we stand by our question as to why there has been no effort nor consideration given to exploring alternative sites for the proposed CWA. Such sites could feasibly be located just 10 to 15 minutes further away from existing land uses and previously approved developments, thereby considering and addressing significant concerns raised about the proposed development since its inception in the public domain.</p> <p>10. EAP response on page 154 of the CRR: “Independent experts in aeroplane performance modelling from Berlin, Germany, have assessed the advantages of utilizing Cape Winelands Airport (CWA) as a diversion airport for flights headed to Cape Town International Airport (CPT). Their analysis, which includes various aircraft types and routes, reveals significant savings in fuel weight and burn when CWA is chosen over other alternate airports like Port Elizabeth (PLZ) or Johannesburg (JNB). For certain aircraft, these savings can amount to as much as 10 tons in fuel uplift and 3 tons in fuel burn, leading to increased payload capacity, reduced operational costs, and substantial savings in carbon emissions due to burning less fuel, thereby providing commercial benefits for airlines”.</p> <p>10.1. Garden Cities comment: We are not disputing the cost savings per flight but are rather highlighting the concern that an increase in the number of</p>	<p>9.1. Response from H & A Planning: The comment was made in direct response to Garden Cities superimposing the noise contours of CTIA onto the CWA site, as it was not possible (or lawful) to conduct a Noise Impact Assessment (NIA) during the scoping phase. Now that the NIA is available, the original comment by Garden Cities and CWA’s response are no longer relevant.</p> <p>As an aside, the runway specifications are such that CWA can act as a reliever airport for the future re-aligned runways of CTIA and aircraft types is but one of many factors impacting on the noise contours.</p> <p>10. Response from CWA:</p> <p>CWA acknowledges the concerns regarding carbon emissions arising from an increase in the total volume of flights due to additional routes and passenger demand. The aviation industry is actively addressing its environmental impact through the adoption of more fuel-efficient aircraft, sustainable aviation fuels, and offset programs, ensuring that connectivity and growth align with global sustainability goals. CWA remains committed to collaborating with stakeholders to balance the benefits of increased connectivity with responsible environmental stewardship, supporting Cape Town’s position as a thriving, well-connected city. CWA aims to be one of the greenest airports in the world, looking inwardly at all its operations. As a closer diversion airport for direct flights inbound to CTIA, airlines will be able to carry less fuel thereby burn less fuel for their routes into Cape Town leading to the potential to reduce CO₂ emissions up to 60 million kilograms per annum.</p> <p>10.1. Response from H & A Planning: The number of flights and routes will inevitably need to increase if Cape Town, geographically isolated at the</p>
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		<p>flights and routes will lead to a higher total volume of flights, thereby raising concerns about the associated increase in carbon emissions.</p> <p>11. EAP response on page 157 of the CRR: “CWA contends that its current site, which was identified as a priority for an airport in 1943 before the development of Cape Town International Airport, meets the criteria for location of a second airport in the City”.</p> <p>11.1. Garden Cities comment: During the planning of Greenville, which was undertaken in collaboration with the Western Cape Province and the City</p>	<p>southern tip of Africa, is to achieve the economic growth necessary to support its anticipated population growth over the planning horizon. The growth in flight numbers reflects Cape Town's status as a globally significant destination and the increasing need for greater route options to meet passenger demand. This connectivity benefits Cape Town’s economy by driving tourism, trade, and investment while enhancing passengers' experience through increased convenience and competitive pricing. The advantage of having an alternative reliever airport is the potential for significant savings in fuel costs and reductions in carbon emissions, compared to routing all flights exclusively through CTIA. through the efficiency it creates into the ecosystem.</p> <p>11. Response from CWA:</p> <p>It is worth noting that in 2012, Garden Cities held rights over Erf 4, but those rights have since lapsed, further emphasizing that the region’s planning dynamics have evolved. CWA’s plans are rooted in principles of equity, sustainability, and regional economic integration, directly addressing the historical inequities that GC claims to oppose. Using emotionally charged language to portray the project in this way appears to be a strategic attempt to divert attention from the broader benefits and careful planning underpinning the airport development. CWA remains focused on engaging constructively with all stakeholders and delivering an infrastructure project that supports the region’s growth and prosperity while addressing the needs of all communities.</p> <p>The land use rights of the airport have not lapsed, and the current airport is zoned Transport 1.</p> <p>CWA remains focused on engaging constructively with all stakeholders and delivering an infrastructure project that supports the region’s growth and prosperity while addressing the needs of all communities.</p> <p>11.1. Response from H & A Planning: As a highly experienced property developer, Garden Cities is fully aware that planning legislation explicitly</p>
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of Cape Town, the Northern District Plan of 2012 stated that “the Fisantekraal Airfield operates under private management. The land use rights for the airfield to operate has however lapsed. It is expected that with the City’s growth corridor extending in the direction of the airfield, that provision needs to be made elsewhere for such a facility”. We therefore disagree that a historical and emergency decision made in 1943 should take precedence over existing land uses and rights, which would be significantly and negatively impacted, especially considering that the clear intent of the City circa 2012 was to have such an airport located elsewhere and not where the CWA currently is.

11.2. At the time of its establishment, the Fisantekraal Airfield was located approximately 13 kilometres northeast of Durbanville, in an area appropriately far removed from residential and housing developments. The dynamics and realities of the region have changed considerably since then. Proceeding with the placement of the CWA in this location risks

states that Municipal Spatial Development Frameworks, District Spatial Development Frameworks, and Local Spatial Development Frameworks do not confer or remove rights, as stated in Sections 9 and 16 of the MPBL.

Similar provisions existed in the planning laws preceding SPLUMA, such as Section 6 of LUPO. Therefore, relying on an error in the replaced District Plan holds no merit, as the District Plan did not grant any rights. The unsubstantiated perception in the 2012 District Plan resulted from the failure to consider Section 14(7) of LUPO, which was later replaced by Section 37 of the MPBL.

Contrary to the erroneous perception that in 2012CWA’s rights have lapsed, the rezoning of Greenville Erf 4 did lapse as acknowledged in par 8.1 above.

The argument is not that the airport should take precedence simply because it was established first (although it was), but rather that land-use decisions should be guided by specific principles.

Section 59 (1) (g) of LUPA prescribes, as a principle of spatial justice, that land use planning must, inter alia, be guided by recognising “the right of owners to develop land in accordance with current use rights.” LUPA defines use rights as follows:

“use right”, in relation to land, means the right to utilise that land in accordance with its zoning, a departure, consent use, condition of approval or any other approval granted in respect of the rights to utilise the land.

In this context, it is pointed out that Greenville Erf 4 has the “current use rights” for Agriculture only, and Portion 4 of Fm 474 Joostenbergs Kloof and Portion 10 of Fm 724 Joostenbergs Vlake have the “current use rights” for an airport. This is one of the Principles of Spatial Justice set out in LUPA to guide land use planning.

11.2. Response from CWA:

The reference to Apartheid-style planning is unwarranted and factually incorrect. Affordable housing and informal settlements are generally located relatively far from economic hubs; however the expansion of CWA represents an opportunity to create access to more economic activity for the Greenville

repeating the planning oversights seen with the growth of the CTIA and the perpetuation of Apartheid-style land use planning, a scenario that, in this case, can and should be avoided.

and surrounding communities and thereby improve socio-economic conditions.

As stated above, the Socio Economic Impact study conducted for the proposed expansion of Cape Winelands Airport indicates that only “57,33% of the total population residing within 10 km of the site is employed, while 59,61% within 20 km are employed.” The study further indicates that “The project could sustain about 32 433 (direct, indirect, and induced) employment opportunities during construction, including ongoing capital expenditure upgrades over 20 years. This could increase household incomes by R3,8 billion over 22 years. During the initial 20 years of operations, the project could sustain about 102 732 direct, indirect, and induced employment opportunities, adding R17,7 billion in household income.”

The CWA development has the potential to unlock meaningful transformation and positively change the social landscape of the region and the communities closer to the airport, such as Fisantekraal.

Successful and transformed cities not only provide people with a place to live, but also spaces where people can live, work, play and learn, all in close proximity without the need to spend large amounts of time and income travelling between spaces.

Response from H & A Planning: Airports, by their very nature, cannot be accommodated in highly built-up areas. Runways, along with their associated noise contours, are best situated in areas of low-intensity land use, preferably outside the urban development edge. However, the landside development of airports—serving as regional entry and logistics points—should ideally be within the urban edge, requiring proximity to urban services, infrastructure, and affordable housing.

The expansion of the airport will improve the urban morphology, created over the past 15 years by housing development primarily concentrated on the city's periphery. This housing growth has outpaced the creation of employment opportunities within the area, highlighting the need for balanced development to support both residential and economic needs. Garden Cities' comments in paragraph 8.1 further underscore this point.

		<p>12. EAP response on page 158 of the CRR: “the most suitable location for a second airport would be in a peripheral urban area”.</p> <p>12.1. Garden Cities comment: The Fisantekraal Airfield may have originally been situated in a peripheral urban location, however, this is no longer the case. The proposed location for the CWA now conflicts with several established enterprises, existing residential areas, and previously approved residential developments, rendering the current site unsuitable. We once again emphasise our concern that no alternative locations have been considered, despite the significant impact on existing land uses and rights currently being exercised.</p> <p>13. EAP response on page 163 of the CRR: “DCs apply to most land use changes that increase intensity and are calculated based on their impact on municipal services, using predefined methodology”.</p>	<p>12. Response from CWA:</p> <p>CWA appreciates Garden Cities’ feedback and the acknowledgment that the Fisantekraal Airfield was originally situated in a peripheral urban location. However, it is important to clarify that while the surrounding region has evolved, the site’s strategic position still meets the criteria for a peripheral urban area. The careful planning behind the phased development of CWA aims to integrate seamlessly with existing and future land uses while minimizing conflicts. Moreover, the proposed site offers unique advantages, including existing infrastructure, accessibility, and land availability, which make it a highly viable and sustainable location.-CWA remains committed to engaging constructively with all stakeholders to address concerns and ensure the development contributes to the region’s economic and social growth while mitigating potential impacts on surrounding enterprises and residential areas.</p> <p>12.1. Response from H & A Planning: With the recommended mitigation measures in place, the proposed airport extension will not significantly impact the existing rights or land uses of Garden Cities.</p> <p>By nature, airports are unsuitable for highly built-up areas; runways and noise contours are best located in low-intensity land-use zones outside the urban development edge. However, landside airport development, as a regional entry point and logistics hub, should remain within the urban edge to ensure good access to services, infrastructure, and affordable housing.</p> <p>EAP response:</p> <p>As stated above, the proposed project is for the expansion of an existing airport with existing rights at this site. It is not for the development of a new airport at a greenfields site, therefor there are NO site / location alternatives.</p> <p>13. Response by CWA:</p> <p>CWA acknowledges Garden Cities’ concerns and appreciates the opportunity to provide further clarity. It is important to note that Development Contributions (DCs) are applied uniformly to all developments that increase</p>
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		<p>13.1. Garden Cities comment: We fully understand how Development Contributions are applied and how same is rolled in conjunction with development projects, but we don't feel that you have addressed/answered our question, as it seems in several instances that CWA relies on other parties to address bulk servicing needs. The question remains: Will the applicant be funding for this bulk service out of their development contributions for the installation of the 1700mm trunk main? When and how will this be programmed and implemented? None of these pertinent questions has been responded to or resolved adequately.</p>	<p>the intensity of use, based on their impact on municipal services, and are calculated using a predefined methodology.</p> <p>The programming, implementation, and allocation of specific bulk infrastructure requirements, such as the 1700mm trunk main, are ultimately decisions to be made by the City of Cape Town. These decisions will consider city-wide priorities, resource availability, and service demand projections across multiple land uses, including the needs of airports and other transport-related developments. The demands of such land uses are highly context-specific and must be determined on a case-by-case basis in alignment with broader municipal planning frameworks. As such, it is not for CWA to state whether it will contribute specifically to the installation of the 1700mm trunk main</p> <p>CWA remains committed to engaging with the City of Cape Town and all relevant stakeholders to ensure that its contributions are aligned with municipal and provincial priorities and that the development supports sustainable regional growth. It will comply with the City's requirements regarding DCs.</p> <p>CWA, however, does not understand the concept of an "Acknowledgment of Debt" for Garden Cities development contributions as mentioned by Garden Cities in paragraph 4.1. CWA seeks further clarification on this point to ensure a shared understanding of the mechanisms being used by Garden Cities, which differ from that prescribed on all developers.</p> <p>13.1. Response from H & A Planning: The highly regulated process of funding and providing bulk services has been outlined in the response. As acknowledged by Garden Cities, it fully understands the process outlined in Section 65 of the MPBL in conjunction with the City's DC's policy. The implementation of engineering services is typically tied to the uptake of development rights, which may be phased. This approach is how Greenville's initial phases were developed. It is unclear which aspects of Section 65 of the MPBL or the DC policy, which Garden Cities has admitted to understanding, are not addressing the question raised under par 13.1. This aspect will be dealt with in compliance with s.65 of the MPBL and the DC policy</p>
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		<p>14. EAP response on page 165 of the CRR: “The comments re potential accidental discharge, emission of gases, risk of exposure to pathogens, management of sludge and energy requirements are noted. Development mitigation measures follow in the Impact Assessment phase during the EIA”.</p> <p>14.1. Garden Cities comment: Further clarification and detailed proposed mitigation measures regarding this query is required prior to the finalisation of the project to fully understand the potential risks and impacts.</p>	<p>14. EAP response:</p> <p>The GC comment relates to the construction of the on-site sewage plant.</p> <p><i>GC comment: If the facility malfunctions or if there is an accidental discharge, untreated or partially treated sewage can contaminate local water bodies, leading to the spread of pathogens, harmful chemicals, and nutrients that can cause algal blooms and eutrophication. This degrades water quality and harms surrounding aquatic ecosystems.</i></p> <p>Response: The risk to groundwater contamination was assessed in the Geohydrological Impact Assessment. Detailed mitigation measures are included in the report and have also been included in the EMPr. To enhance the reliability and resilience of the WWTW system, the installation of an emergency overflow pond is proposed which shall provide a mitigation against spillage should there be a problem with the pumpstation (refer Bulk Engineering report Revision L).</p> <p>There are no aquatic ecosystems in close proximity to the proposed location of the WWTW, therefore there is no risk of algal blooms or eutrophication.</p> <p>GC comment: Sewage treatment plants can emit gases such as methane, ammonia, and hydrogen sulfide, which can contribute to air pollution. These gases can also produce unpleasant odors that affect the quality of life for Greenville Garden City residents.</p> <p>Response: The air quality impacts from the WWTW have been assessed in the Air Quality Impact Assessment. Proposed mitigation measures are included in the report and have also been included in the EMPr.</p> <p>GC comment: There is a risk of exposure to pathogens and harmful chemicals if the facility is not properly managed. Odors and emissions from the plant may also lead to respiratory issues or other health concerns for people living in Greenville Garden City.</p>
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15. EAP response on page 170 of the CRR: "The comment re the map on page 190 is noted and will be considered. Refer to 1.2 and 1.3 above".

15.1. Garden Cities comment: Presenting incorrect information in the figure leads to misleading and misrepresented data, which ultimately affects the evaluation of impacts. We do not accept your response. Our approved Concept Plan, which outlines the overall planning for Greenville, clearly illustrates the need for residential areas, schools, and other essential urban infrastructure—elements that the proposed CWA would severely and negatively impact. We request that the plans be amended to accurately reflect the correct position.

Response: The air quality impacts from the WWTW have been assessed in the Air Quality Impact Assessment. Proposed mitigation measures are included in the report and have also been included in the EMPr.

15. Response from CWA:

The designation of the area as "Commercial" in the figure was included by the independent traffic consultant, ITS, to illustrate potential higher order uses for the space. Since the zoning of the area has been amended to "Agricultural," the maps and figures will be updated to reflect this accurately.

The original comment by Garden Cities stating that "the majority of the land use is residential zoning" is incorrect. Erf 4 Greenville, directly south of CWA, is zoned for Agriculture, and its current land use is agricultural. Please refer to the responses to paragraphs 8.1 and 11.1 above for further clarification.

While it is acknowledged that Garden Cities has expressed a desire to develop this land for residential and ancillary purposes, the approved rezoning based on the "Conceptual Layout" has now lapsed for Erf 4 Greenville. It is also important to note that the "Conceptual Layout" did reflect the existing airport and must have taken that into account.

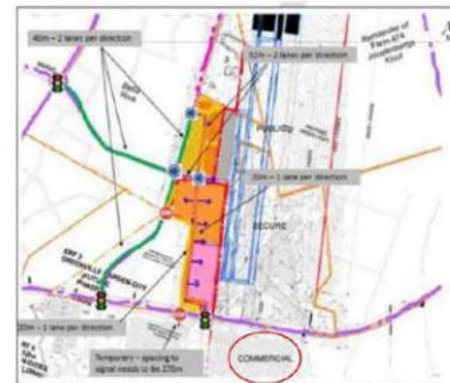
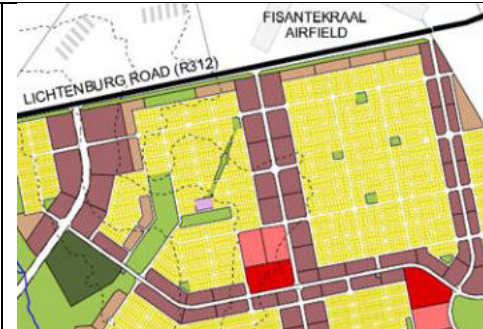


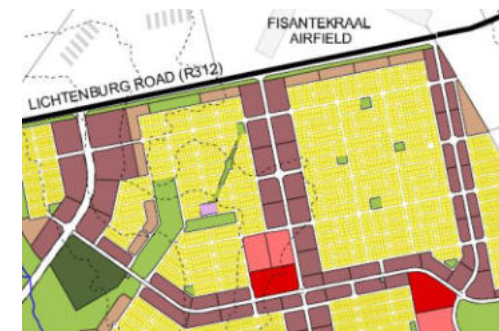
Figure 45: Conceptual design Internal Roads (ITS, Transport Scoping Report, Sept 2022)



Response from H & A Planning:

The original comment by Garden Cities stating that "*the majority of the land use is residential zoning*" is incorrect. Erf 4 Greenville, directly south of CWA, is zoned for *Agriculture*, and its current land use is agricultural. Please refer to the responses to paragraphs 8.1 and 11.1 above for further clarification.

While it is acknowledged that Garden Cities has expressed a desire to develop this land for residential and ancillary purposes, the approved rezoning based on the "Conceptual Layout" has now lapsed for Erf 4 Greenville. It is also important to note that the "Conceptual Layout" did reflect the existing airport and by must have taken that into account.



Extract from Garden City New Town Conceptual Layout August 2010
indicating Fisantekraal Airfield

		<p>16. EAP response on page 174 of the CRR: “CWA is an existing operational and licensed airport that has been in existence for 80 years, operating at the current site”.</p> <p>16.1. Garden Cities comment: During the planning of Greenville the Northern District Plan 2012 referenced the Fisantekraal Airfield as operating under</p>	<p>16. Response from CWA:</p> <p>The statement on page 174 of the CRR accurately reflects the historical and continuous operation of the airfield at its current site.</p> <p>The land underwent a formal rezoning process under the City of Cape Town’s Municipal Planning By-Law. On the 1st of March 2021, the airport property was rezoned from Agricultural Zone to Transport Zone 1, with Council’s consent granted for airport use. The rezoning approval for Portion 4 of Farm 474 and Portion 10 of Farm 724, Paarl Farms, was specifically to establish an airport, with development restricted to a maximum of 6,000m² Gross Leasable Area (GLA) as per the approved site plan.</p> <p>As part of this rezoning process, several key conditions were imposed. These included requiring the developer to cover all service and infrastructure costs, with any amendments to the approved site plan necessitating a recalculation of development charges. Road reserve and access must comply with the requirements of the Western Cape Government, and future development will require a heritage NID (Notification of Intent to Develop) submission.</p> <p>Additionally, a stormwater management plan is mandatory for any new structures or relocations to align with the City’s policies, and all activities on the airfield must comply with the Western Cape Noise Regulations to ensure adherence to environmental, transport, and planning standards.</p> <p>It is these key conditions, imposed during the 2021 rezoning process, that CWA is now actively addressing. This ensures compliance with all regulatory frameworks and demonstrates a commitment to aligning the development with modern planning principles and the needs of the surrounding community. The planning and development process incorporates extensive stakeholder engagement, ensuring that the project aligns with both historical context and current urban realities.</p> <p>16.1 Response from H & A Planning: As stated above, as a highly experienced property developer, Garden Cities is fully aware that planning legislation</p>
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private management and that the land use rights for the airfield had lapsed. CWA's response is therefore inherently misleading. We therefore do not agree that a historical and emergency decision taken in 1943 should take preference to existing land uses and rights which will be significantly impacted by the development of an international airport bigger than CTIA. At the time of the decision to locate the Fisantekraal Airfield, it was decided to locate such approximately 13 kilometres northeast of Durbanville, away from any residential and housing opportunities. The dynamics and reality of this has changed considerably since then and the placement of the proposed CWA would be built with similar oversights faced by CTIA presently.

17. EAP response on page 174 of the CRR: "As an upgrade of an existing airport rather than choosing a new site aligns with the preference expressed in the NADP".

explicitly states that Municipal Spatial Development Frameworks, District Spatial Development Frameworks, and Local Spatial Development Frameworks do not confer or remove rights, as stated in Sections 9 and 16 of the MPBL.

Similar provisions existed in the planning laws preceding SPLUMA, such as Section 6 of LUPO. Therefore, relying on an error in the replaced District Plan holds no merit, as the District Plan did not grant any rights. The unsubstantiated perception in the 2012 District Plan resulted from the failure to consider Section 14(7) of LUPO, which was later replaced by Section 37 of the MPBL.

Contrary to the erroneous perception in 2012 that the Airport's rights have lapsed, the rezoning of Greenville Erf 4 did lapse as acknowledged in par 8.1 above.

The argument is not that the airport should take precedence simply because it was established first (although it was), but rather that land-use decisions should be guided by specific principles.

Section 59 (1) (g) of LUPA prescribes, as a principle of spatial justice, that land use planning must, inter alia, be guided by recognising "the right of owners to develop land in accordance with current use rights." LUPA defines use rights as follows:

"use right", in relation to land, means the right to utilise that land in accordance with its zoning, a departure, consent use, condition of approval or any other approval granted in respect of the rights to utilise the land.

In this context, it is pointed out that Greenville Erf 4 has the "current use rights" for Agriculture only, and Portion 4 of Fm 474 Joostenbergs Kloof and Portion 10 of Fm 724 Joostenbergs Vlake have the "current use rights" for an airport. This is one of the Principles of Spatial Justice set out in LUPA to guide land use planning.

17. Response from CWA:

The response on page 174 of the CRR aligns with the National Airport Development Plan (NADP) preference for upgrading an existing site over

		<p>17.1. Garden Cities comment: This response is misleading. Currently, there are four outdated structures and poorly maintained landing strips, of which only two are usable. This does not align with your response regarding the upgrading of an existing airport, as none of the current facilities or airstrips will be utilised. The only aspect of the present airport will be the alignment of the existing airstrip. Given this, our concern regarding the lack of consideration of alternative locations remains, particularly in light of the objectives of an EIA.</p>	<p>developing a completely new airport. While we acknowledge that the current facilities and airstrips at the site require significant redevelopment, the essence of the upgrade lies in utilizing and enhancing the existing airport's location, alignment, and established presence as an operational site.</p> <p>The alignment of the existing airstrip remains a fundamental component of the development, and its continuation ensures that the site is not a wholly new development but an upgrade in line with NADP principles. The decision to upgrade this site, rather than seek a new location, considered several factors, including the historical use of the site as an airfield, existing zoning and permissions, and the potential to minimize environmental and social impacts by avoiding the disturbance of a greenfield site.</p> <p>The selection of this site is supported by its strategic location, alignment with regional and national development objectives, and the potential to accommodate phased development that integrates with existing and planned infrastructure.</p> <p>While redevelopment involves replacing outdated infrastructure to meet modern aviation standards, this does not negate the principle of upgrading an existing airport. The process is guided by the requirements of the EIA and aims to ensure that all environmental and social impacts are appropriately assessed and managed. The considerations raised regarding alternative locations are noted and have been addressed within the scope of the EIA and associated planning processes.</p> <p>This comment fails to address airspace, a critical component for airports.</p> <p>17.1. Response from H & A Planning:</p> <p>CWA is a licensed aerodrome in terms of the Civil Aviation Act, No 13 of 2009 which is currently in use, albeit for different types of aircraft on a different scale to that now proposed. The Act provides for the definition of an airport as follows: "airport" means "an aerodrome as defined in section 1 of this Act." There can be no question that this is an upgrade of an existing airport. The impacts of its expansion, including the realignment of airstrips, are the subject of the EIA.</p> <p>CWA response: Currently only two of the four runways are in operation based on demand. The current two existing and unused runways can be put back into</p>
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			<p>operation by the aerodrome owner/operator at any time by way of an application process to the SACAA. The SACAA process is an administrative process that will require the runways applied for meeting/being compliant with the required technical standards and will be audited accordingly. The runways being applied for would be included in the standard CAA application form submitted to the SACAA.</p> <p>The SACAA will also require an amendment of the Aeronautical Information Publication (AIP) which is a crucial document, issued by the state's civil aviation authority, containing essential, permanent aeronautical information vital for safe air navigation, including regulations, procedures and details about air navigation facilities at the aerodrome. With the above concluded the two runways will be put back into operation. The above process resides wholly with the competent authority, in this case the SACAA and will not require public input or an EIA approval.</p> <p>A very different process is followed in the event that you require an amended licence such as our intentions to upgrade and expand the airport. By way of our current EIA application, we intend to upgrade the category of the airport to accommodate larger aircraft and introduce scheduled commercial flights. This represents an amendment of the current licence and the process to do so is contained in the Civil Aviation Regulations Part 139, sub-part 2:</p> <p><i>(1) Application for licence or amendment thereof</i></p> <p><i>139.02.2 application for issuing or amendment of an aerodrome licence shall be made to the Director in the appropriate prescribed form and accompanied by—</i></p> <p><i>(a) an aerodrome manual referred to in regulation 139.02.11 for aerodrome licence with a Category 4 and higher;</i></p> <p><i>(b) plans of an aerodrome;</i></p> <p><i>(c) written approval from the local government concerned;</i></p> <p><i>(d) an environmental impact report, if required in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998);</i></p>
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		<p>18. EAP response on page 174 of the CRR: “The CWA properties have access to groundwater that can sustain 75% percentage of the water demand”.</p> <p>18.1. Garden Cities comment: Has this statement been confirmed by your specialists in any of your assessments? If so, indicate where.</p> <p>19. EAP response on page 174 of the CRR: “The potential cost of establishing an airport to the proposed project scale at an alternative greenfield site would prove to be excessive given that the current site and properties are already</p>	<p><i>(e) written approval from all relevant government institutions listed in Document SA-CATS 139;</i></p> <p><i>(f) proof that the applicant is financially capable of operating an aerodrome including the provision of firefighting service as contemplated in regulation 139.02.15, for aerodrome licence with a Category higher than 3;</i></p> <p><i>(g) particulars of non-compliance with, or deviations from—</i></p> <p><i>(i) appropriate aerodrome design, operation or equipment standards prescribed in this Part; or</i></p> <p><i>(ii) appropriate airspace classification requirements prescribed in Part 172; and</i></p> <p><i>(h) appropriate fee as prescribed in Part 187.</i></p> <p>In the event that we are not successful with our EIA application to expand and upgrade the airport we will fall back on the current airport, existing infrastructure and rights. Under this scenario we will use current infrastructure and rights to allow for maximum throughput i.e. all four runways. It is then for this reason that it is appropriate to use all four runways as the base case for the noise modelling done by the noise specialist. Anything less or different will not provide I&AP's with an accurate understanding of the implications under this scenario.</p> <p>18. EAP response: The detailed water balance was completed for the proposed development and is included in the Bulk Engineering report, the draft EIAR and the WULA technical summary report. Water supply to the site is from multiple sources which includes both borehole and municipal supply, dependant on phasing. Amendment to the SDP has also amended the water balance.</p> <p>19. Response from CWA:</p>
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		<p>available, the site is operational as an airport and could be optimized due to available land to accommodate the proposed project”.</p> <p>19.1. Garden Cities comment: This response by CWA is misleading. Currently, the CWA consists of four outdated structures with poorly maintained landing strips, only two of which are usable. This does not align with the position that the CWA will merely be upgraded as none of the current facilities nor airstrips will be utilised. Instead, only the alignment of the existing airstrip is being considered for the proposed development. Given this, we find the lack of consideration of alternative locations to be concerning and disingenuous.</p> <p>20. EAP response on page 182 of the CRR: “While alternative layouts can mitigate some impacts, they may not fully address the biodiversity loss that is inevitable with large-scale developments like ours. Offsets are not only a legal and common mechanism but also a proven and effective tool to achieve the necessary environmental outcomes”.</p>	<p>The assertion by Garden Cities regarding the condition of the CWA site and its facilities does not account for key factors that justify the selection of this location for the proposed development. While it is true that the existing airstrips and buildings are outdated, the site’s inherent value lies in its operational status, established zoning, environmental approvals, and airspace management framework. The current runways will be crushed and repurposed as a subbase for the realigned and extended runway, which exemplifies the efficient reuse of existing infrastructure to reduce environmental impact and construction costs. Developing a greenfield site, by contrast, would require the acquisition of new land, the construction of entirely new infrastructure, and extensive regulatory and environmental approvals, significantly increasing costs and delays. Furthermore, the CWA site aligns with regional spatial planning frameworks eliminating the need to replicate such infrastructure at a new location.</p> <p>19.1 Response from H & A Planning: The site was specifically chosen by the South African Air Force in 1943 due to its relatively flat topography. Creating the runway safety area with excessive cut and fill would not be financially viable. Additionally, building a new road network with sufficient capacity, instead of upgrading the existing network, would be excessive given the high costs per kilometre for Class 3 roads. The existing airport is adjacent to a Class 3 road, 1km from another Class 3 road, and 3km from a third.</p> <p>Refer response point 17.1 also.</p> <p>20. Response from CWA: Garden Cities' comment appears to conflate the discussion of alternative layouts with alternative locations. CWA’s response on page 182 of the CRR specifically addresses alternative layouts, particularly in relation to the runway positions and overall site configuration. These alternative layouts were evaluated to mitigate environmental impacts within the constraints of the current site. While it is acknowledged that large-scale developments inevitably result in some biodiversity loss, the focus was on minimizing these impacts through careful design and alignment of the runway and associated infrastructure. The reference to offsets further emphasizes the commitment</p>
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		<p>20.1. Garden Cities comment: This confirms our concern that no alternative locations were considered and that a single solution has been proposed and pushed forward despite the significant environmental impacts and impacts on existing land uses and rights.</p> <p>21. EAP response on page 187 of the CRR: “While it is true that Garden Cities has invested significant time and effort over the past 17 years in obtaining the</p>	<p>to achieving environmental outcomes beyond the site boundaries, as required by law.</p> <p>Therefore, the specific matter of alternative runway layouts and designs remains distinct from considerations of alternative locations, and CWA has thoroughly engaged with this issue to mitigate impacts as far as possible.</p> <p>20.1 EAP response:</p> <p>The CWA is an existing airport with existing rights. As stated in the draft EIAR page 133: From a location perspective, it must be emphasized that the location of the existing airfield (Fisantekraal Airfield) was chosen in 1943 as the preferred location by the government at the time due to key aviation criteria which still exist today, i.e.:</p> <ul style="list-style-type: none"> • 399 ft elevation above sea level, setting the site at above the fog belt during low visibility conditions relative to the rest of the city • Flat land suitable for runways orientated towards the prevailing wind directions (NW and SE) • Away from obstacles/mountains such as the Stellenbosch/Paarl mountains, or the Tygerberg Hill which is a significant obstacle for CTIA • Positioned on the outskirts of the city, which significantly reduces the impact of noise on urban development compared to an airport positioned within a city. <p>Airports are best located on the outskirts of cities due to the large swathes of vacant land required for such developments while also balancing the need to remain a convenient driving option and minimize the noise impact on existing developments. After considering all of the above and considering that CWA is positioned conveniently off the N1 highway, it is determined that from a desirability perspective, CWA is extremely well located.</p> <p>21. Response from CWA:</p> <p>As mentioned above, the issue of alternative locations was comprehensively addressed in response number 5.</p>
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		<p>necessary development rights for the Greenville Garden City, this does not preclude other developments, such as CWA, from proceeding”</p> <p>21.1. Garden Cities comment: We are not suggesting that other developments should be excluded, nor are we opposing the concept of a proposed airport. However, we are opposed to the CWA in its chosen location due to the significant impacts on the Greenville Housing development, especially without any alternative locations having been considered.</p> <p>22. EAP response on page 195 of the CRR: “Although DEADP lacked a formal policy, it tried to adhere to SANS 10103 guidelines, which recommend that urban residential areas should not exceed an LRdn of 55 dBA. This limit was supported by amendments to the Noise Control Regulations, with the proviso that these limits should not be significantly exceeded. DEADP recognizes that strict adherence to a 55 dBA LRdn contour can limit land availability for residential use, though it remains suitable for commercial and industrial purposes. The precedent set by the Minister also makes it clear that DEADP will support residential developments on land exposed to noise below an LRdn of 65 dBA”.</p> <p>22.1. Garden Cities comment: The letter you reference clearly indicates that the noise cones referenced are problematic. The letter also notes that the situation at CTIA is different and that such scenarios should be avoided. Airports should not be located in close proximity to residential areas. In this case, an alternative site would help prevent and mitigate the concerns raised by DEADP in their letter.</p>	<p>22.1.CWA Response: While the letter by A Bredell is not directly applicable to CWA it does demonstrate precedence that has been set for similar developments. Whilst it is acceptable practice to allow for housing development up to 65 dBA it should and can be avoided when possible, as in this case and where residential is then restricted to 55 dBA. This can be done with collaborative planning efforts. CWA has committed to working with Garden Cities to find and agree on acceptable solutions, such as land acquisitions or joint ventures. During an engagement between representatives from Garden Cities and CWA in December 2024 it was agreed that CWA will put forward recommended options in the New Year. This engagement was scheduled for the end of February 2025 but postponed by Garden Cities. CWA has prepared a proposal/s for Garden Cities, which has been sent to Garden Cities and feedback from Garden Cities board is awaited.</p> <p>Response from specialist: For Scenario 1, the LRdn 60 dB(A) noise zone is entirely contained within the airport site, demonstrating the effectiveness of CWA's design to address noise concerns. With the introduction of the realigned runway, the noise impact zones during the operational year will be significantly reduced compared to those associated with the current runway system operating at full capacity.</p> <p>To further minimize noise impacts, CWA has implemented a displaced threshold for landings and take-offs, strategically positioning these operations away from the runway ends. This adjustment reduces noise exposure to surrounding areas by ensuring aircraft operations occur farther from sensitive receptors. Additionally, lights have been incorporated at both thresholds to enhance safety and operational efficiency.</p> <p>The LRdn 55 dB(A) zone during the operational year will cover only 1.44km² and will remain entirely within the development area of the airport site. It will not extend into the proposed residential areas to the west and south of the airport, ensuring these areas are not subjected to unacceptable noise levels. These measures, along with the strategic</p>
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		<p>INFRASTRUCTURE / ENGINEERING SERVICES</p> <p>23. Gibb (Pty) Ltd conducted an external review of the Engineering Services Report on the proposed project by Zutari (Pty) Ltd dated 12 August 2024, and specifically how the engineering services for the proposed project may negatively impact the Greenville Garden City development.</p> <p>24. With reference to water infrastructure and supply, Gibb (Pty) Ltd identified the following challenges and concerns:</p> <p>24.1. Insufficient capacity: The existing water infrastructure cannot meet the full demand of the proposed project (22.25 l/s) without significant upgrades to existing infrastructure or the development of new infrastructure. There is a risk of water shortages and inadequate supply for the proposed project unless these improvements are made.</p> <p>24.2. Intermittent pressure drops: Pressure drops in the existing 250mm Ø pipelines present operational challenges that could affect the overall supply reliability, especially during peak demand periods. These pressure</p>	<p>alignment of the new runway and modern noise mitigation technologies, reflect CWA's commitment to addressing noise concerns while adhering to environmental and planning regulations. The letter does not reference the noise cones as problematic, it just in fact extends the 55dBA to 60dBA making the acceptable noise level higher.</p> <p>23. Noted. Neither CWA nor its consultants can comment on a study done independently where neither it, nor its own engineers have seen it.</p> <p>24.1 Response from Zutari: Agreed, infrastructure upgrades and or new infrastructure are necessary and will be required.</p> <p>In response to 24.2 and 24.3 we want to clarify the water supply philosophy for CWA. Our water supply to the site is from multiple sources which includes both borehole and municipal supply. These various sources are collected and stored in on-site tanks which will then be reticulated within CWA, no direct connection from the municipal line is made. We would also like to note that there is no existing 250dia pipe, we are proposing a short extension of the 450mm dia municipal water main to supply CWA and neighbouring developments and thereafter reducing to a 250mm dia water supply main to the CWA development. We also note that our water demand has been amended after a decrease in the development bulk. We thus are able to supply the development from a combination of boreholes and the existing municipal capacity which the City have confirmed they can supply.</p> <p>24.2. To mitigate against pressure drops and other operational challenges during peak demand scenarios we have proposed the following: - We have proposed multiple water sources not only from the municipal main but other water sources such as boreholes on site</p>
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		<p>drops may further compromise the availability of water for essential services like fire flow.</p> <p>24.3. Velocity issues: High velocities in the 450mm pipeline (up to 2.57 m/s under fire demand conditions) pose potential risks for erosion and damage. This necessitates careful monitoring and a redesign of the pipeline to prevent long-term damage and ensuring a stable water supply.</p> <p>24.4. Dependency on future infrastructure: The proposed project’s success is heavily dependent on the timely implementation of significant infrastructure upgrades, including the development of new reservoirs and pipelines. Delays in these upgrades could severely impact the development’s water supply and overall viability of the infrastructure available.</p> <p>25. From an electrical perspective, Raubicon Engineers and Project Managers (Pty) Ltd identified the following concerns with the Electrical Supply Technical Report dated 20 August 2024: 25.1. 25.2.</p> <p>25.1. The report dated 20 August 2024 indicates a 66kV line route that crosses Grenville Garden Cities landholdings. This line has not been discussed with Garden Cities and impacts the existing Township Layout Concept Plan. This should have been documented and the option issued to Garden Cities to agree to, however this has not been done.</p> <p>25.2. The report dated 20 August 2024 offers a broad spectrum of green energy options but fails to indicate that these are not instant solutions and will only be feasible once the project is completed. These options do not address the issue concerning the level of infrastructure required for the initial set up of the proposed project which will be Eskom-supplied.</p>	<p>- We have proposed on-site tanks to buffer against peak demands/high demand scenarios,</p> <p>- Furthermore, the city will also do its own analysis to ensure the demands from the development are not placing undue strain on the municipal system.</p> <p>24.3. Under fire demand scenarios, water for firefighting is proposed to be drawn from separate fire tanks on site which will have sufficient storage capacity to buffer against peak demand conditions and stressing the municipal mains.</p> <p>24.4 Agreed. The timing and the implementation of infrastructure will have to be carefully monitored.</p> <p>25 Response from Selkirk:</p> <p>25.1 The report “indicatively indicates the routing of the MV Supply”. This work will be completed by Eskom as part of the Mains Connections; Eskom will have to finalize the design, approvals, routing, implementation, etc, and work with affected Landowners to achieve a suitable solution/connection for the site. In the event there is a problem with the routing from the West side of the site, it will be possible to use the feeder connection planned from the southern end of the site that does NOT cross Greenville Garden Cities.</p> <p>25.2 We do not agree with the comments. The project will NOT require completion to include the PV Solutions, which can be undertaken during the construction phases of the works. The total connection/supply availability from PV Sources is subject to available space to place these panels. The implementation of battery storage would be included as a scalable solution as part of the planned construction phases of the works. In terms of the biogas plant, there is no reason why this cannot be implemented as part of the site infrastructure works, as the feedstock required for this plant can be available to suit the supply/source connection</p>
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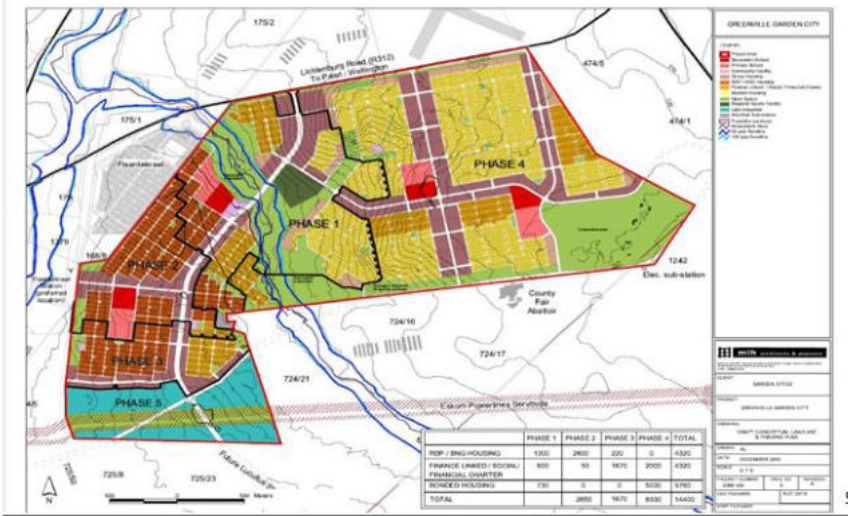
		<p>SOCIO-ECONOMIC IMPACTS</p> <p>26. The proposed CWA project will have a significant and material adverse socio-economic impact on the Greenville development and the land use rights granted to Garden Cities by the City of Cape Town in connection with the Greenville development in all its component phases. A critical objective of the EIA process is to identify and predict the actual or potential impact on socio economic conditions, including the impact of the proposed development on the feasibility and/or sustainability of other developments in the receiving environment. The Fuel Retailers case held that such impacts form an essential and legitimate component of the assessment and such considerations are required by law to be carefully assessed during the EIA process.</p> <p>27. With regard to the DEIAR and associated specialist studies it is clear that the impact on the feasibility and/or sustainability of the Greenville development and/or on Garden Cities – as a key and directly affected stakeholder - has not been evaluated, considered nor assessed in the manner and/or detail required by the National Environmental Management Act 107 of 1998 (“NEMA”), the EIA Regulations and indeed as stipulated by the Constitutional Court in the Fuel Retailers case.</p> <p>28. There is a legal obligation on the EAP to investigate evaluate and assess the full range of potential impacts on Garden Cities’ operations and the Greenville development in particular because the proposed CWA project gives rise to unsustainable impacts and severe adverse socio-economic impacts that</p>	<p>program. In terms of the wind sources, as per the above, these can be implemented as part of the building phased works. As to the availability of Eskom Power, this would in any event have to be provided as part of the site bulk infrastructure. The total Eskom Supply Connection will also be subjected to a phased capacity scalable implementation. The total planned site power will not be required for the initial planned phases.</p> <p>26. & 27. Response from Multi-purpose Business Solutions:</p> <p>The Greenville development is acknowledged as a surrounding land user and ongoing development, and Garden Cities' concerns were recorded in the SEIA. Our assessment of the impact on surrounding land uses is not specific to the Garden Cities Greenville development, as other development projects, such as Bella Riva, may also be affected.</p> <p>CWA Response: Greenville residents and surrounding communities stand to benefit significantly from the proposed CWA development. As stated above, the Socio Economic Impact study conducted for the proposed expansion of Cape Winelands Airport indicates that only “57,33% of the total population residing within 10 km of the site is employed, while 59,61% within 20 km are employed.” The study further indicates that “The project could sustain about 32 433 (direct, indirect, and induced) employment opportunities during construction, including ongoing capital expenditure upgrades over 20 years. This could increase household incomes by R3,8 billion over 22 years. During the initial 20 years of operations, the project could sustain about 102 732 direct, indirect, and induced employment opportunities, adding R17,7 billion in household income.”</p> <p>28. Response from EAP: The full range of potential impacts were scoped during the Scoping Phase and assessed during the Impact Assessment Phase. The IAP was afforded the opportunity to comment on the scope of impacts twice and all responses provided were considered by specialists.</p> <p>Response from Multi-purpose Business Solutions:</p>
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		<p>implicate and undermine the sustainability of the Greenville development and Garden Cities' operations.</p> <p>29. The full extent of such direct, indirect and cumulative socio-economic impacts has not been quantified by the EAP and are not reported on in the DEIAR but they are nonetheless critically important considerations that are an essential precursor (and sine qua non) to the overall evaluation of the need for and desirability of the proposed development required in terms of NEMA and the EIA Regulations. It follows that in the absence of a comprehensive assessment of all attendant socio-economic impacts, not only is the assessment process deficient but the enquiry into Need and Desirability is materially flawed.</p> <p>30. A legitimate concern is established where there has been a failure to investigate potential adverse socio-economic impacts and to offer sufficient measures to avoid those adverse socio economic impacts. At this stage the impact of a proposed development on the feasibility and/or sustainability of the Greenville development has not been adequately assessed during the EIA process.</p>	<p>The viability and sustainability of the Greenville development would be impacted by a plethora of factors covered by various specialists that may or may not affect the viability and sustainability issues raised by the Garden Cities. Even if all the factors are quantified and consolidated in a socio-economic impact analysis, it will still not address the viability and sustainability concern, and any assertions made would not be tested without an underpinning of credible information.</p> <p>29. – 31. EAP response: The full range of potential impacts were scoped during the Scoping Phase and assessed during the Impact Assessment Phase. The IAP was afforded the opportunity to comment on the scope of impacts twice and all responses provided were considered by specialists.</p> <p>According to the amended Socio-economic report (Appendix 23):</p> <p>The Rode study applied internationally accepted depreciation percentages to determine the impact on property values in and around CTIA. The 55 dB(A) impact zone for Scenario 3 covers a total area of 10.3km², extending 4.3 km to the northwest and 3.5km to the southeast from the runway ends. Based on the maps of existing residential areas around CWA, this 55dB(A) impact zone does not overlap with any existing residential dwellings, except for a single farmhouse north of CWA, situated on the eastern side of Klipheuwel. This means that only this farmhouse could experience a potential impact on property values. Based on global benchmarks, property devaluation is estimated at 0.7% per dB(A) increase beyond 55dB(A), with higher-end properties experiencing up to 1.5% per dB(A). Consequently, the farmhouse may see a proximate reduction of 5,6% in value due to noise exposure.</p> <p>Several international studies also concluded that homes under or near the flight corridors of national or international airports experience some diminution in property values (Mense & Kholodilin, 2014). The impact of flight noise levels on property values depends on various factors such as the flight path, the location of residents on either side of the flight path, the flight level of the aircraft, etc. The nature of the airport and the type of aircraft able to land there also play a role. The studies of aircraft noise impacts have focused</p>
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		<p>33. Given the myriad of affordable housing opportunities provided by the Greenville development in all its phases, the proposed CWA project will impact adversely on local communities' right to adequate housing and a healthy environment – which will result in a long-term, irreversible “high negative” impact. This, in turn, has various constitutional implications as confirmed in the Government of the Republic of South Africa and Others v Grootboom and Others case which emphasised the constitutional right to adequate housing in a healthy environment and subsequent governmental duties in terms of housing development, and that housing is essential to the realisation of the other socio-economic rights.</p>	<p>stakeholder input. Greenville and CWA serve distinct purposes, with potential for complementarity rather than conflict.</p> <p>Response from EAP: As stated above, the full range of potential impacts were scoped during the Scoping Phase and assessed during the Impact Assessment Phase. The IAP was afforded the opportunity to comment on the scope of impacts twice and all responses provided were considered by specialists.</p> <p>33. Response from CWA:</p> <p>CWA respectfully disagrees with the assertion that the proposed development will have a "high negative" or irreversible impact on local communities' right to adequate housing and a healthy environment. The CWA project and Greenville development serve different but complementary purposes, and there is no evidence to suggest that CWA undermines Greenville's ability to provide affordable housing. On the contrary, the increased economic activity and job creation driven by CWA have the potential to enhance regional development, indirectly supporting housing and infrastructure initiatives.</p> <p>The constitutional principles outlined in the Grootboom case emphasizes the state's responsibility to advance socio-economic rights, including adequate housing, within a balanced framework of sustainable development. CWA aligns with these principles by fostering economic growth and infrastructure improvements that benefit the broader community, including Greenville residents. Concerns should be addressed constructively through the EIA process, which is designed to ensure compliance with constitutional and statutory obligations.</p> <p>EAP response: S24 of the Constitution guarantees the right to an environment that is not harmful to the IAP's health and well-being. This is not an absolute right; it must be part of an obligation on the state to implement reasonable legislative and other measure to promote justifiable economic and social development (section 24(b)(iii)). The EIA Regulations are one such measure, and the assessment of the impacts will be used by DEADP to determine whether the negative impacts assessed are acceptable in the light of the environmental right.</p>
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34. The Greenville development will contribute over 5000 government subsidised (RDP/BNG) houses, which is a significant contributing factor in addressing and providing much needed housing, especially considering Cape Town’s housing crisis.



34.1. In support of the above, see the below tables outlining the BNG, GAP/FLISP and Group Housing projections for the short-, medium- and long-term roll out of the Greenville Garden City development:

34. Response from CWA:

Since obtaining development rights in 2012, Garden Cities has embarked on an ambitious housing programme to address critical housing needs through Breaking New Ground (BNG) and Finance Linked Individual Subsidy Programme (FLISP) housing projects. While the goal of delivering over 14,000 units is ambitious, it has clearly not been achieved. Greenville delivery progress and highlights shortfalls

Delivery Performance

Houses Completed Since 2012:

- Breaking New Ground (BNG): 2,820 houses.
- FLISP: 16 houses.
- Total completed: 2,836 houses. (See comment 59.1 by Garden Cities)
- Pipeline Projections:
- Additional houses planned through BNG/GAP/FLISP and Group Housing pipeline: 4,295 units.
- Total projected completion by 2040: 7,131 units.

Delivery Summary:

- Approved houses across all phases: 14,652.
- Houses delivered by 2025: 2,836 (19.4% of the approved total).
- Projected completion by 2040: 7,131 (48.7% of the approved total).
- Shortfall by 2040: 7,521 houses (51.3% of approved total).

Financial Impact:

- Value of a completed house: R279,000 (current value).
- Total value of completed houses since 2012:

$$2,836 \times R279,000 = R791,244,000$$

- Although Garden Cities is implying that itself has been impacted by CWA in terms of completed houses, these houses have been sold and are owned by third parties. These completed houses in Phases/

BNG HOUSING PROJECTED SHORT- MEDIUM AND LONG TERM ROLL OUT PLAN
 GAP/FLSP HOUSING PROJECTED SHORT-MEDIUM AND LONG TERM ROLL OUT PLAN

PHASE	DESCRIPTION	# of DWELLING UNITS	STATUS	TIMELINE	POPULATION
PHASE 1.3 sub phase K, L, Q, R, V, W, X, Y	GAP/FLSP/BONDED HOUSING	581	Under construction	2021-2025	2324
PHASE 2.4 sub phase, as	GAP/FLSP/BONDED HOUSING	71	Pipeline	2024-2025	284
PHASE 3.5	GAP/FLSP/BONDED HOUSING	323	Town planning subdivision submitted for approval	2025-2027	1292
FUTURE PHASE 5	GAP/FLSP/BONDED HOUSING	916	Pipeline planning	2028-2032	3664
Total		1891			7564

GROUP HOUSING PROJECTED SHORT-MEDIUM AND LONG TERM ROLL OUT PLAN

PHASE	DESCRIPTION	# of DWELLING UNITS	STATUS	TIMELINE	POPULATION
PHASE 1.4	GROUP HOUSING	1206	Pipeline	2025-2030	4824
PHASE 2.5	GROUP HOUSING	304	Pipeline	2030-2033	1216
PHASE 3.6	GROUP HOUSING	258	Town planning subdivision submitted for approval	2034-2036	1032
PHASE 5	GROUP HOUSING	636	Pipeline	2036-2040	2544
		2404			9616

34.2. Rated as the highest negative impact factor,⁶ the SIA identifies the following factors which will contribute to the adverse impacts on the sense of place for surrounding land users, which directly affects the residential developments impacted by the proposed CWA project, with particular emphasis on developments in direct proximity to the CWA such as Greenville:

Parcels 1 and 2 will not be impacted by CWA and it is disingenuous and misleading to imply that they are.

Success Factors

Completed Units:

Delivering 2,836 houses since 2012 demonstrates some progress despite numerous challenges.

Completed houses are sold to buyers and are not retained by Garden Cities and for Garden Cities to include this in their financial impact is incorrect, notwithstanding they are not negatively impacted either.

Commitment to Pipeline Projects:

The inclusion of 4,295 houses in the pipeline (as provided by Garden Cities in this comment) demonstrates Garden Cities' intention to continue addressing the housing backlog albeit in a very slow manner.

Economic Viability:

With an average net income of R25,000 per house (as provided by Garden Cities in this comment), the housing program has generated R70.9 million in net income since 2012 with an average income before operating costs of R5m per year. It is highly likely with operating expenses that Garden Cities is making a loss. This is based on all numbers provided by Garden Cities in their comment.

Slow Pace of Delivery:

Garden Cities has built an average of 201 houses per year since 2012.

At this current pace, it would take 73 years to complete all approved houses, significantly extending the timeline for alleviating housing pressures.

Funding Constraints:

Many housing projects depend on government subsidies and external financing, which are often inconsistent or insufficient.

Key Statistics:

			Metric	Value	
			Approved Houses	14,652 units	
			Houses Completed (2012–2025)	2,836 units	
			Percentage Completed (2012–2025)	19.4%	
			Pipeline Units (2025–2040)	4,295 units	
			Total Projected Completion by 2040	7,131 units (48.7%)	
			Shortfall by 2040	7,521 units (51.3%)	
			Average Annual Delivery Rate (2012–2025)	201 houses/year	
			Required Delivery Rate to Meet Approval	610 houses/year (2012-2040)	
			Total Value of Completed Houses	R791,244,000	
			<p>While Garden Cities’ objective is to provide first time homeowners with houses, these completed houses are not owned by Garden Cities and are often sold to third parties (who are not first-time homeowners) at a fraction of the value – leading to Garden Cities not achieving their objective.</p> <p>Projected Shortfall Completion Table - Based on the current average annual delivery rate of 201 houses per year:</p>		
			Year	Total Houses Delivered	Remaining Shortfall
			2025	2,836	11,816

			2030	3,841	10,811
			2040	7,131	7,521
			2050	9,141	5,511
			2060	11,151	3,501
			2070	13,161	1,491
			2073	14,652	0
			Phase Completion Timeline:		
			Phase	Units	Expected Completion Year
			Phase 1	3,852	2031
			Phase 2	3,600	2049
			Phase 3	3,600	2067
			Phase 4	3,600	2073
			<p>At the current pace of construction, Garden Cities will achieve the full delivery of 14,652 houses by 2073, significantly beyond the planned 2040 timeline. Additionally, Phase/Parcel 4, containing the final 3,600 units, will only commence in 2067 at the current rate of delivery if it is phased in sequence 1 - 4</p> <p>While Garden Cities has demonstrated intent and some progress in housing delivery, the goal of providing over 14,000 units has not been achieved. A delivery rate of approximately 200 houses per year is insufficient to make a</p>		

34.2.1. Visual impact:

- Research has shown that light pollution, especially that of artificial nature and that which is prevalent in the nighttime, will have a significant impact on human health, such as causing fatigue, increase anxiety, and even contribute to the development of certain cancers.
- Whilst the Visual Impact Assessment (“VIA”) addresses some mitigating techniques to address the negative impacts of night lighting, such as the use of “low level ‘bollard’ type lights” and “warm light sources”, 8 the report clearly warns that “It might not be possible for parts of the proposed development to adhere to the above mitigation measures”. Considering this

meaningful impact on Cape Town’s housing crisis. Challenges such as funding constraints, approval delays, and infrastructure limitations have further hindered progress. At the current rate, the full approved housing target will only be met by 2073, emphasizing the need for a significant acceleration in delivery efforts.

CWA firmly believes that the expansion of the airport together with Garden Cities Greenville development presents a tremendous opportunity to collaborate, integrate planning and to leverage these important infrastructure developments and create meaningful opportunities to change the socio-economic conditions for the Fisantekraal community and beyond.

If one considers that Garden Cities apparently develops these houses at a loss, the long leads times associated with delivery of these houses then a considered and intentional planning process with meaningful integration between the developments has more to offer than continuing in a siloed approach.

Not only can first time homeowners secure their houses, but through socio-economic upliftment in the area they can also afford to keep and maintain these homes due to closer and additional employment opportunities and new business nodes. CWA acknowledges the strategic objectives and intentions of Garden Cities and firmly believes that CWA can make a positive contribution, noting the current challenges that Garden Cities face as articulated above.

34.2.1 Response from Filia Visual:

As noted in section 3.3.2., the VIA acknowledges that the proposed CWA development must be seen within the context of an area which is currently undergoing significant urban development; and that this will most likely intensify in the future (in the short, medium and long term. Figure 50 of the VIA shows the proposed CWA subject site in the context of future developments that are generally supported and/or championed by the provincial, municipal and district policy frameworks – Greenville Garden City is one of these. However, the VIA has focused on the changes that these developments will themselves bring about on the landscape character and

		<p>statement, the long-term adverse visual impacts are a legitimate concern to surrounding land users and yet the DEIAR offers no meaningful nor concrete mitigation measures which would lessen or manage the impacts on the surrounding areas, who will be subjected to constant light pollution 24/7.</p>	<p>sense of place of the receiving environment, rather than framing future residents as potential sensitive receptors.</p> <ul style="list-style-type: none"> - The southernmost development edge of the CWA is notably undeveloped and will to some extent maintain the element of openness that the rural agricultural landscape is currently valued for. A large part of the development edge in question will contain no buildings, only open space surrounding the runway (being part of the Airport Airside Precinct), and the portion of the General aviation Precinct abutting the Greenville Garden City is proposed to contain only three buildings within reasonable view of the Phase 4 area's residents that would have direct line of sight along the northern edge of that part of the development (where it borders on the R312). - Although the proposed CWA airport will result in a transformation of the receiving environment from its current baseline, its effect on visual receptors within the Greenville Garden City should not be considered especially problematic from a sense of place point of view. This statement takes into consideration that: <ul style="list-style-type: none"> ▪ The majority of the southernmost development edge is not proposed to be developed; ▪ that the additional setback offered by the Open Space corridor shown in the Draft Conceptual Land Use and Phasing Plan further increases distance from visible elements; ▪ the existing mitigation measures recommended for the R312 road corridor (e.g., requirements relating to landscaping, control of signage, height restrictions on buildings and the call for a buffer zone along the scenic route) will also serve to address visual sensitivities within the residential areas to the south of the R312. • It should also be noted that the CWA will not be the only contributor to an increase in light pollution in the area. The R312 is a Class 2 Major Arterial Road that will be widened in future (regardless of whether the CWA is developed or not) will include the erection of streetlights that come standard with a road of this designation – although these lights will most likely be lowered opposite the runway. Additionally, the Greenville residential development itself can be expected to be a major contributor to light pollution in the area – the Concept
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			<p>layout shows local access streets that feed into major collector streets (i.e. Class 3 Roads) that will have tall and bright streetlights for road safety purposes in what appears to be a fairly high-density development. The sensitivity of receptors that take views from within a highly urbanised development decreases significantly, especially in relation to sensitivity to the impacts of light at night.</p> <ul style="list-style-type: none"> • Surrounding residential areas were listed as sensitive receptors in the VIA (see page 50 where the Greenville Garden City residential area is mentioned specifically, and page 14, where sensitive receptors are listed). <p>- However, the objector is correct in noting that the VIA excluded explicit reference to the future residents of the Greenville Garden City in the descriptions included in the impact assessment tables. This will be corrected.</p> <ul style="list-style-type: none"> • The VIA contains numerous mitigation measures that address the management of visual impacts on residential areas/sensitive visual receptors (see for example 7.3.1.a.ii, 7.3.1.a.iv, and 7.3.2.c.), and particular attention is given to remedial measures related to the management of lighting. The expert believes that the existing lighting mitigation measures already address some of the objector's concerns. <p>The VIA will address the objector's concerns by:</p> <ul style="list-style-type: none"> o Explicitly including the future residents of the Greenville Garden City residential development as possible sensitive receptors in the VIA; o Re-considering the visual impact assessment to include the assessment of the visual impact of lighting on these receptors explicitly, and as necessary; o Including the MLH Architects and Planners' Draft Conceptual Land Use and Phasing Plan into the VIA, to be listed in the references. o The mitigation measures relating to the visual impacts associated with the R312 and the southernmost development edge (i.e.; the southern boundaries of the Airport Airside Precinct and the General Aviation Precinct) will be reconsidered where necessary, and adjusted to include more concrete or specific recommendations to address concerns related to lighting impacts on the future Greenville Garden City development in the final review of the VIA.
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		<p>34.2.2. Noise:</p> <ul style="list-style-type: none"> This objection contends that the DEIAR for the proposed project significantly underestimates the noise impacts on the Greenville development, relying on inaccurate noise assessments, proposing insufficient mitigation measures, and misrepresenting the existing status of Greenville’s ongoing and active residential development, ultimately demonstrating that the proposed CWA project, as currently proposed, is incompatible with socio-economic development and poses a serious threat to the well-being of residents. <p>34.2.3. Air pollution:</p> <ul style="list-style-type: none"> The Air Quality Impact Assessment Report for the proposed project inadequately assesses the impacts on the existing and future phases of the Greenville development, as well as other surrounding areas, failing to consider the cumulative impacts, and also not recognizing Greenville as a sensitive receptor. The current Air Quality Impact Assessment Report fails to evaluate mitigation measures effectively, and address key stakeholder concerns, ultimately rendering the report inadequate and unreliable in demonstrating that the project can be developed without causing significant and unacceptable air quality impacts on the Greenville development. 	<p>Specialist response: the widening of the R312 has no set timeframe and will be linked to development of the area over time. It is proposed that it coincides with Phase 2 of the proposed project.</p> <p>34.2.2</p> <p>CWA respectfully disagrees with the assertion that the DEIAR underestimates noise impacts or misrepresents Greenville’s status as an active residential development. The Noise Impact Assessment conducted as part of the EIA follows recognized methodologies and standards to evaluate potential noise impacts comprehensively. Mitigation measures have been proposed based on these findings, and additional adjustments can be explored in collaboration with stakeholders if specific concerns are substantiated.</p> <p>Furthermore, CWA does not inherently conflict with socio-economic development; rather, it has the potential to drive regional growth, create jobs, and enhance infrastructure, benefiting surrounding communities, including Greenville. Noise management strategies will continue to be refined during the EIA process to ensure compatibility with local development and the well-being of residents. Assertions of incompatibility or threat remain unsubstantiated, and CWA remains committed to working with all stakeholders to address concerns constructively.</p> <p>34.2.3.</p> <p>CWA response: The comment that the Air Quality Impact Assessment (AQIA) inadequately addresses impacts on Greenville development and surrounding areas appears to overlook key components of the report. The following points address the concerns raised:</p> <p>Identification of Greenville as a Sensitive Receptor: The AQIA explicitly identifies Greenville Garden City as a receptor in its scope (Section 1.2). The report outlines its proximity to the Cape Winelands Airport (CWA) and assesses potential impacts on local communities, including those closest to the airport, as per standard air quality assessment practices.</p> <p>Cumulative Impact Assessment: Contrary to claims, the report does address cumulative impacts. Section 1.5 discusses cumulative effects by modelling</p>
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		<p>35. Based on the omissions and gaps in information in the DEIAR for the proposed CWA project, there is no rational basis to conclude that the adverse socio-economic impacts have been appropriately investigated evaluate or assessed, and that the mitigation measures proposed will be a failsafe mechanism for</p>	<p>emissions from both current and proposed operations and assessing their combined influence on air quality standards. The analysis includes industrial and vehicular sources in the surrounding area, offering a holistic view of air quality implications.</p> <p>Mitigation Measures: The AQIA dedicates specific sections to proposed mitigation measures, including those to control dust during the construction phase and operational emissions (Section 1.6). Practical measures such as air quality monitoring, emission reduction strategies, and localized mitigation are outlined to minimize impacts.</p> <p>Stakeholder Concerns: The report references stakeholder engagement and integrates their input into its methodology. Recommendations for air quality monitoring stations and ongoing management plans reflect efforts to address concerns comprehensively.</p> <p>Reliability and Expertise: The assessment was conducted using advanced tools like the Aviation Environmental Design Tool (AEDT) and adheres to national standards. The specialist, with over 25 years of experience in air quality, provides confidence in the methodology and findings (Declaration of Independence and Specialist Details).</p> <p>Compliance with Standards: Model outputs are compared against the South African National Ambient Air Quality Standards (Section 5.3). Results demonstrate that, even under worst-case scenarios, pollutant concentrations comply with national thresholds.</p> <p>Given these detailed provisions, the AQIA cannot be deemed inadequate or unreliable. It adheres to legal, technical, and methodological requirements, sufficiently demonstrating that the proposed project can coexist with surrounding developments, including Greenville, without causing significant air quality impacts. Misrepresentations in the critique risk undermining a thorough and independent analysis.</p> <p>35. The EAP notes the comment. This is a repeat of previous comments and has been addressed above.</p>
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		<p>protecting the viability of the Greenville development. There is insufficient information in the EIA process to guarantee that anticipated impacts will be avoided and/or mitigated. In the absence of relevant information, the competent authority should adopt a risk averse and cautious approach.</p> <p>NEED & DESIRABILITY</p> <p>36. The need for and desirability of the proposed activity is required to be specifically and explicitly addressed throughout the EIA process when dealing with the direct, indirect as well as cumulative impacts of the proposed CWA project. An integral aspect in determining the need for and desirability of the proposed activity in the present circumstances is necessarily the socio economic impact on the land use rights held by Garden Cities for the Greenville development as well as the long-term sustainability of the Greenville development which stands to bear the brunt of the impacts associated with the project (ie. visual, noise, traffic etc).</p> <p>37. The Guideline on Need and Desirability, 2014 is instructive in determining whether the proposed CWA project contributes to or detracts from the sustainability of the proposed development in light of the adverse impacts on surrounding land uses and developments. In this regard we note the following:</p>	<p>36. Response from H & A Planning: The repetitive reference to the “the land use rights held by Garden Cities for the Greenville development” makes it necessary to repeat what those rights are.</p> <p>The proposed airport extension will not significantly impact on the existing rights or land uses held by Garden Cities, subject to the implementation of the recommended mitigation measures. As acknowledged above, the rezoning of Greenville Erf 4 has lapsed, and its existing rights and use is that of Agriculture.</p> <p>Response from Multi-purpose Business Solutions: From a socio-economic perspective, desirability or “placement” refers specifically to the best practical environmental option for the proposed site. The best option is the one that provides the most benefit or causes the least environmental damage at a cost acceptable to society in the long and short term. In other words, is the project adequately contextualised in (1) the broader context of its location, (2) in terms of surrounding communities and (3) in terms of existing planning policies/guidelines and economic development initiatives?</p> <p>The site is an existing airport, and the CWA plans are adequately contextualised, i.e. improving an existing airfield with various development rights. The surrounding communities would benefit economically, but challenges from a social perspective are highlighted in terms of a sense of place, with various specialists recommending mitigation measures. Thirdly, the development fits with spatial planning, and a very large portion is within the urban edge.</p> <p>37.</p>
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		<p>37.1. The location of the proposed CWA project does not compliment the future use of the surrounding area, i.e the Greenville development;</p> <p>37.2. The proposed CWA development is not in-line with the spatial planning for the area envisaged by the land use rights held by Garden Cities and developments undertaken in connection with the long-term design, planning and implementation of the Greenville development in all its phases;</p>	<p>37.1. Response from H & A Planning: The future use of Erf 4 Greenville will have to be determined through its own EIA and rezoning processes which will determine complementary land uses.</p> <p>Response from CWA: The basis of this statement is unclear. CWA respectfully disagrees with the assertion that the proposed airport location does not complement the future use of the surrounding area, including the Greenville development. The airport is designed to serve as a key infrastructure asset that enhances regional connectivity, boosts economic activity, and creates opportunities that benefit nearby developments such as Greenville. Far from being incompatible, CWA's presence will stimulate investment, improve access to markets, and support local businesses, aligning with Greenville's goals of fostering a sustainable and thriving community.</p> <p>Furthermore, CWA is committed to implementing mitigation measures to address potential impacts, including noise management, traffic optimization, and visual integration, ensuring that Greenville's character and quality of life are preserved. The coexistence of CWA and Greenville can create a synergistic relationship, where the airport acts as a catalyst for growth while Greenville benefits from improved infrastructure and proximity to a key regional economic hub. This alignment supports the broader objectives of sustainable and inclusive development for the Western Cape.</p> <p>37.2. Response from CWA:</p> <p>The proposed Cape Winelands Airport (CWA) development has been carefully conceptualized to align with the broader spatial and economic objectives of the region.</p> <p>It is worth emphasizing that the CWA development introduces strategic infrastructure that has the potential to enhance the viability of surrounding land uses by attracting investment, improving access, and stimulating local economic activity. The proposed development does not detract from the spatial planning objectives of the area but rather contributes to the broader vision of sustainable growth by ensuring that regional infrastructure keeps pace with development needs. Through continued engagement and collaborative planning, the CWA project can coexist with and complement the</p>
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		<p>37.3. The proposed CWA project will not result in the equitable distribution of impacts in the long term as the proposed activity will disproportionately impact the residents of all phases of the Greenville development;</p>	<p>Greenville development, contributing to a balanced and future-focused spatial framework for the area.</p> <p>Response from H & A Planning: The word "envisaged" in this context does not relate to existing land use rights. The repetitive reference to the “the land use rights held by Garden Cities for the Greenville development” makes it necessary to repeat what those rights are.</p> <p>The proposed airport extension will not significantly impact on the existing rights or land uses held by Garden Cities, subject to the implementation of the recommended mitigation measures. As acknowledged above, the rezoning of Greenville Erf 4 has lapsed, and its existing rights and use is that of Agriculture.</p> <p>37.3. Response from CWA:</p> <p>It is factually incorrect to state that the proposed activity will disproportionately impact the residents of all phases of the Greenville development. From a noise perspective CWA has no impact on Phase/Parcel 1,2 and 3. Phase/Parcel 4 zoning rights have expired and Phase/Parcels 5-7 are conceptual.</p> <p>The assertion that CWA will disproportionately impact Greenville residents overlooks the project's commitment to equitable impact distribution and mitigation. Comprehensive assessments, including noise, traffic, and visual studies, guide the implementation of measures such as noise abatement, optimized flight paths, and visual buffering to minimize adverse effects. Additionally, CWA brings significant socio-economic benefits, including job creation, regional connectivity, and infrastructure improvements that will enhance opportunities for Greenville residents. Through phased implementation and ongoing engagement, CWA aims to balance impacts and benefits, ensuring a sustainable and inclusive future for the region.</p> <p>Response from H & A Planning: See response to par 11.2. The expansion of the airport will improve the urban morphology, created over the past 15 years by housing development primarily concentrated on the city's periphery. This housing growth has outpaced the creation of employment opportunities within the area, highlighting the need for balanced development to support both residential and economic needs.</p>
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		<p>37.4. The proposed CWA project undermines the spatial planning for the area which is aimed at satisfying the strategic objective of providing housing to a range of different household incomes, with a specific focus on low-cost housing;</p> <p>37.5. A significant portion of the Greenville development caters for RDP/BNG housing. In this regard, insufficient measures have been taken to pursue environmental justice so that the adverse environmental impacts of the proposed activity will be distributed in a manner that does not discriminate against vulnerable and disadvantaged people to be placed in the BNG housing;</p>	<p>37.4. Response from CWA: The spatial planning for the area extends beyond housing and includes broader objectives such as economic growth and infrastructure development. The Municipal Spatial Development Framework (MSDF) specifically recognizes CWA as an airport, emphasizing its critical role in supporting regional needs. While housing, including affordable options, is important, CWA complements these goals by driving economic growth, creating jobs, and improving infrastructure. The MSDF's recognition of CWA underscores its alignment with the broader spatial planning vision for balanced and sustainable development.</p> <p>The spatial planning for this area has continually aimed to create work opportunities near residential developments, but this has been largely unsuccessful to date, as noted in the response to paragraph 11.2.</p> <p>CWA's extension will help address the current urban morphology that has developed over the past 15 years, where housing delivery, largely on the outskirts of the city, has outpaced employment creation.</p> <p>Garden Cities' comments in paragraph 8.1 above emphasize this point. It is not the recent proposal for the airport extension that has hindered the expansion of Greenville within the planned timeframes, but rather the lack of desirability and affordability resulting from insufficient employment opportunities in the area.</p> <p>37.5. Response from H & A Planning: This generalized and emotive statement lacks sufficient detail regarding which specific impacts will affect the poor and vulnerable. It is not possible to respond to such an unsubstantiated and broad claim.</p> <p>Response from CWA:</p> <p>The Cape Winelands Airport (CWA) is fully committed to environmental justice, ensuring that no community, including those in BNG housing, bears a disproportionate share of environmental impacts. Comprehensive assessments are in place to address potential issues like noise, traffic, and air</p>
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		<p>37.6. The size, scale, scope and nature of the proposed development in relation to its location and other planned developments in the area (specifically the Greenville development) results in a development that will not contribute to social and economically sustainable development in the short- and long-term. This is largely due to the impacts of the proposed CWA project on the feasibility of the Greenville development which consists of a mixture of low-, middle- and high-income housing opportunities.</p>	<p>quality, with targeted mitigation strategies such as noise abatement, optimized flight paths, and traffic management.</p> <p>CWA is not just about infrastructure—it’s about opportunity. The project will bring jobs, improve connectivity, and boost economic growth, directly benefiting vulnerable communities. Through active engagement with stakeholders and robust environmental management, CWA ensures fairness, sustainability, and shared benefits for all, without placing an undue burden on any group.</p> <p>CWA is equally committed to an embedded sustainability approach including the principle of understanding community needs and partnering with the relevant agencies who focus on social development so that socially driven programmes are also implemented.</p> <p>37.6. Response from CWA:</p> <p>The Cape Winelands Airport (CWA) development has been strategically designed to contribute to both social and economic sustainability in the short- and long-term, complementing rather than undermining nearby developments such as Greenville. The scale, scope, and nature of CWA are aligned with regional spatial planning frameworks, including the Municipal Spatial Development Framework (MSDF), which explicitly recognizes the need for an airport in this location to support economic growth and infrastructure needs.</p> <p>CWA will serve as a catalyst for regional development, driving job creation, attracting investment, and improving connectivity—benefits that will enhance the viability of mixed-income housing developments like Greenville. By improving access to employment opportunities and infrastructure, CWA aligns with the principles of sustainable development that benefit all income groups.</p> <p>The assertion that CWA impacts Greenville’s feasibility overlooks the broader socio-economic benefits it brings to the region, including strengthened infrastructure and economic inclusivity. Through detailed planning, impact assessments, and stakeholder collaboration, CWA is committed to ensuring that its development supports a balanced, integrated, and sustainable future for the region as a whole.</p>
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		<p>38. The direct threat to the feasibility and viability of the Greenville development is the precise situation that the Court in Fuel Retailers sought to avoid, remarking that it is the object of the EIA process to identify and predict the actual or potential impact on socio-economic conditions to ensure that the earth does not become “a graveyard for commercially failed developments”.</p>	<p>Response from H & A Planning: It is not the recent proposal for the airport extension that halted the expansion of Greenville within planned time horizons. It is the lack of desirability and affordability as the result of insufficient employment opportunities in the vicinity. The comments made by Garden Cities under par 8.1 above underscores this point.</p> <p>38. Response from CWA:</p> <p>The Cape Winelands Airport (CWA) development has been designed with a comprehensive understanding of its socio-economic and environmental impacts, fully aligning with the principles outlined in the Fuel Retailers judgment. The EIA process for CWA explicitly seeks to identify, assess, and mitigate potential impacts on surrounding developments, including Greenville, ensuring that both projects can coexist and thrive.</p> <p>The assertion that CWA poses a "direct threat" to Greenville’s feasibility misrepresents the broader objectives of the EIA process and the socio-economic benefits that CWA will bring. Far from jeopardizing Greenville’s viability, CWA is a critical regional infrastructure project that will enhance economic opportunities, attract investment, and improve accessibility—factors that can strengthen Greenville’s long-term feasibility and desirability.</p> <p>The Fuel Retailers case underscores the importance of informed, balanced decision-making to avoid unsustainable developments. CWA’s phased approach, rigorous impact assessments, and commitment to stakeholder collaboration ensure that the project supports sustainable regional development without undermining existing or planned developments like Greenville. By fostering a mutually beneficial relationship, CWA contributes to a vibrant and sustainable future for the area.</p> <p>Response from H & A Planning: The recent proposal for the airport extension has not halted the expansion of Greenville within the planned timeframes. Rather, it is the lack of desirability and affordability due to insufficient employment opportunities in the area. Garden Cities' comments in paragraph 8.1 above highlight this point.</p>
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		<p>39. The Need and Desirability Guideline is also clear in its stipulation that “whether a proposed activity will be in line with or deviate from the plan, framework or strategy per se is not the issue, but rather the ecological, social and economic impacts that will result because of the alignment or deviation” (own emphasis). This will require a two-part assessment, namely that policy compatibility be tested and that the EAP undertake an assessment of how the alignment or deviation from policy will result in inter alia social and economic impacts. It is the resultant impacts that are of crucial concern to the enquiry into need and desirability. The EIA and associated appendices have failed to engage with this level of assessment.</p> <p>INADEQUATE CONSIDERATION OF ALTERNATIVES</p> <p>40. The transparent and rational evaluation of alternatives is an essential part of evaluating the full range of environmental, social and economic impacts of the proposed development (and implicates the criterion of need & desirability). It also has an important role in allowing stakeholders to understand that they</p>	<p>39. Response from CWA:</p> <p>CWA fully acknowledges the principles outlined in the Need and Desirability Guideline and recognizes the importance of assessing the ecological, social, and economic impacts resulting from the alignment or deviation from existing plans, frameworks, or strategies. Contrary to the assertion, the EIA process for CWA has been designed comprehensively to address these impacts through detailed studies, stakeholder engagement, and alignment with legislative requirements.</p> <p>Policy compatibility has been carefully considered, as the Municipal Spatial Development Framework (MSDF) explicitly identifies the location of CWA as suitable for airport infrastructure. The EIA and associated appendices evaluate how this alignment with policy supports regional objectives and drives economic and social benefits while implementing mitigation measures to address potential ecological and social concerns.</p> <p>Furthermore, the assessment of resultant impacts is central to the CWA’s approach, including detailed studies on noise, traffic, visual effects, and socio-economic implications. These analyses are being conducted with a focus on balancing short- and long-term impacts, ensuring that the project contributes positively to sustainable regional development. The claim that this level of assessment has not been engaged is therefore unfounded, as the EIA process is explicitly structured to meet the requirements of the Need and Desirability Guideline through evidence-based analysis and collaboration with affected stakeholders.</p> <p>Response from H & A Planning: Appendix 36 (previously Appendix 40) thoroughly evaluates spatial policy alignment on pages 10 to 16, with further details provided on pages 22 to 45. The draft EIAR, along with Appendix 42 (the Impact Assessment Summary), assesses the ecological, social, and economic impacts resulting from both the partial alignment and partial deviation from spatial policies.</p> <p>40. The EAP notes the comment and agrees on the 3 Alternatives listed. Please note there are also Alternatives in terms of Technology related to energy; Technology related to Waste Management and Technology related to</p>
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		<p>have been able to influence the project through a positive, informed contribution to the substantive assessment process. This has unfortunately been bypassed as the assessment of alternatives to the project in the EIA documentation is materially deficient and inadequate. The report merely states that “assessment of alternatives above are at the current CWA site as it is the only site / location alternative, and as the proposed project is for the expansion of the existing airport with existing aviation rights no activity alternative exists”. The alternatives posited by the applicant are:</p> <p>40.1. Alternative 1 is to “Do Nothing” which implies development of the site within the ambit and scope of current rights;</p> <p>40.2. Alternative 2 entails the construction of a 3.5km main runway at orientation 01-19 and initial retention of 700m cross runway 14-32; and</p> <p>40.3. Alternative 3 which is the same as Alternative 2 but without the 700m cross runway 14-32.</p> <p>41. One of the principal requirements of the EIA process is that the EAP must ensure that development alternatives are considered during the process and that the influence of such alternatives on the project (and the evaluation of environmental impacts) are transparently set out. Alternatives should ideally be identified and assessed at all key stages of the planning and design process, including site location, development scale and project design. This requirement</p>	<p>wastewater treatment and management. Alternative 4 (Preferred) has been developed based on inputs from IAPs and stakeholders.</p> <p>Response from CWA: The assertion that the evaluation of alternatives is materially deficient overlooks the context and implications of Alternative 1. The "do nothing" scenario under Alternative 1 would result in the retention of four existing runways, each approximately 90 meters wide and averaging 1,200 meters in length, oriented in different directions. This configuration would allow CWA to operate aircraft traffic across multiple runways, dispersing operational impacts such as noise, emissions, and overflights over a far broader area compared to a consolidated single-runway configuration.</p> <p>In contrast, the proposed alternatives (2 and 3) with a primary 3.5km main runway focus operations along a single axis, significantly narrowing the footprint of potential impacts. This approach enables more efficient mitigation of noise and environmental effects while optimizing air traffic operations. The consolidation of operations onto a primary runway allows for better implementation of noise abatement procedures, optimized flight paths, and reduced environmental disturbance compared to the multi-directional impact of Alternative 1.</p> <p>The evaluation of alternatives demonstrates that the proposed development prioritizes minimizing broader environmental and social impacts while maintaining operational efficiency. Stakeholders are encouraged to recognize that the alternatives assessment is not just about feasibility but also about reducing the cumulative impacts on the surrounding communities and environment. The assessment provides a transparent and rational basis for decision-making, reflecting the specific needs and constraints of the CWA project.</p> <p>41. Noted. The process followed to date has identified Alternatives and assessed the potential impacts of these alternatives on the environment. All impact assessments are shared with IAPs for comment.</p>
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		<p>lies at the heart of sustainable development and Integrated Environmental Management.</p> <p>42. Given the significant potential for the project to exacerbate conflict between incompatible land uses (particularly where the project will have a significant adverse effect on residential areas), best practice requires the EAP to consider and report on:</p> <p>42.1. Alternative locations and scales of development in order to avoid and mitigate negative impacts;</p> <p>42.2. Alternative site layouts and access arrangements;</p> <p>42.3. Different approaches to project design to avoid and minimise the adverse effects;</p> <p>42.4. A description of how the project has evolved since project inception in order to avoid and manage impacts (including an explanation as to why alternative options have not been selected). In cases where no alternative sites were considered, the reason why alternative sites were not feasible should be explained;</p> <p>42.5. Assess the “no-go” option;</p> <p>42.6. A comparison of the magnitude and significance of the effects of the project and all the alternatives considered; and</p> <p>42.7. A clearly articulated and transparent description and explanation of all the reasons (environmental, social and economic) for precisely how the assessment process have culminated in of the preferred alternative.</p> <p>43. Regarding the above critically important components, this has not been done in detail. We submit that the level of information made available in the DEIAR is totally inadequate and cannot sustain meaningful public participation nor informed (and defensible) decision-making. This has not been done. The principal criticisms of the DEIAR include:</p> <p>43.1. Alternative locations, scales of development, approaches, site layouts etc. are not documented;</p>	<p>42. The EAP notes the requirements as listed. Note these requirements are already developed in the Scoping Phase of the proposed project, and assessment occurs in the EIA Phase.</p> <p>42.1 Please note there are no Location Alternatives. This has previously been discussed. The proposed project is for the expansion of an existing airport at an existing airport site with existing rights. Location alternative does not apply.</p> <p>42.2 Please note the SDP has been amended in line with site layouts and access arrangements (Alternatives 2 and 3). A further Alternative 4 has been developed based on IAP and stakeholder input.</p> <p>42.3 Note this requirement was incorporated in the SDP amendments and Technology alternatives assessed.</p> <p>42.4 This has been included in the draft EIA report. Please note there are no Location Alternatives. This has previously been discussed.</p> <p>42.5 The no go Alternative has been included for assessment.</p> <p>42.6 This has been included in the impact assessment per specialist report.</p> <p>42.7 This has been included in the amended draft EIAR.</p> <p>43. The EAP has addressed this concern.</p> <p>43.1 This has been addressed above.</p> <p>43.2 The independence of specialists assessing the alternatives and the independence of the EAP is established.</p>
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		<p>expansion of the existing airport with existing aviation rights no activity alternative exists". Nor is it clear in terms of what factual matrix the assessment of alternatives was undertaken by the EAP. This is inadequate and especially so considering that the state of the site presently, without any further development, offers limited value beyond a deteriorated airstrips and aging infrastructure with little to no utility and none of which is planned to be utilised by the applicant in the proposed development beyond the alignment of the existing airstrip.</p> <p>INADEQUATE APPLICATION OF THE MITIGATION HIERARCHY</p> <p>51. The mitigation hierarchy is widely recognised in EIA literature as the best practice approach to managing environmental impact and risk. According to the mitigation hierarchy, efforts should be made to prevent or avoid impacts to the receiving environment, then minimise and reduce, and then repair or restore adverse effects. According to the Department of Environmental Affairs, 2014, Environmental Impact Assessment and Management Strategy for South Africa:</p>	<p>to ensure its operational feasibility and minimal impact on surrounding environments and communities. The site must meet the following conditions:</p> <ul style="list-style-type: none"> • Proximity to the City: The location must be close enough to Cape Town to provide practical access for residents and businesses while serving as a functional alternative to Cape Town International Airport (CTIA). • Distance from Built-up Areas: The site must be sufficiently distant from existing developed or built-up areas to avoid undue disruption to communities and existing infrastructure. • Land Requirements: The site must include contiguous land spanning approximately 4.5 kilometres, which the developer either owns or has direct control over. There is simply no point in putting forward alternatives that are not under control of the developer. This land must be relatively flat to accommodate the runway, lighting systems, and runway end safety areas. • Avoidance of Protected Areas: The location must not encroach on protected nature reserves or ecologically sensitive zones. • Airspace Considerations: The site must be situated outside the controlled airspace of Cape Town International Airport to ensure operational safety and compliance with aviation regulations. • Nuclear Safety Zone Exclusion: Specific to Cape Town, the site must be located outside the Koeberg Nuclear Precautionary Action Zone (5km radius) and the Urgent Protective Action Zone (16km radius). <p>This EIA is for the extension of an existing airport at an existing site with existing rights. No site alternatives exist.</p> <p>51.& 52 CWA Response:</p> <p>The mitigation hierarchy is central to the Cape Winelands Airport (CWA) Environmental Impact Assessment (EIA) process and has been applied rigorously to identify, assess, and manage potential impacts in alignment with best practices and the principles outlined by the Department of Environmental Affairs (2014).</p>
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		<p>“The Impact Mitigation Hierarchy is a tool which is used reiteratively throughout a project lifecycle to limit negative impacts on the environment. The first tier considers how to avoid the impact entirely and is considered early in the project to allow for alternatives to be considered. The impacts which cannot be avoided should be minimised. Effective minimisation can eliminate some impacts and reduce others allowing for sustainability targets to be met. Where the targets cannot be met, the application should be declined.” (Emphasis added).</p> <p>52. The application of the mitigation hierarchy in the environmental assessment process is required by law. NEMA and the EIA Regulations call for a hierarchical approach to impact management in terms of which, first and foremost, alternatives must be investigated to avoid negative impacts altogether.</p> <p>53. The most efficacious mitigation measures or alternative options have not been identified, evaluated or assessed by the EAP in the EIA process because sufficient alternatives have not been considered. The necessity for alternatives to be considered thoroughly and for the mitigation hierarchy to be applied is a critical consideration due to the significant, long-term, and severe nature of the</p>	<p>The first tier of the mitigation hierarchy—impact avoidance—was incorporated during the project’s conceptual and planning stages. This includes selecting a fixed location aligned with the existing airport’s rights and infrastructure, thereby avoiding unnecessary greenfield development. Additionally, alternative scales, layouts, and configurations have been assessed to prevent impacts where possible, such as through optimized flight paths to avoid sensitive areas.</p> <p>Where avoidance was not feasible, significant efforts have been made to minimize impacts. Measures include noise abatement strategies, visual buffering, flight path optimization, and traffic management systems, all of which reduce the environmental and social footprint of the project. These minimization efforts reflect a commitment to achieving sustainability targets while addressing stakeholder concerns.</p> <p>For residual impacts, the project includes plans for restoration and rehabilitation where applicable. This is particularly relevant to landscaping, biodiversity offsets, and habitat restoration initiatives designed to mitigate any long-term environmental effects.</p> <p>The DEIAR transparently documents how the mitigation hierarchy has been applied across all tiers, ensuring that potential impacts are addressed systematically. The application of the hierarchy has been iterative, revisiting project decisions to refine mitigation strategies where necessary, consistent with the project lifecycle approach recommended by best practices.</p> <p>Contrary to the assertion, the mitigation hierarchy has been a cornerstone of the CWA EIA, ensuring that the project adheres to the highest standards of environmental management and sustainability. The process demonstrates a proactive approach to impact management, balancing development needs with environmental and social responsibility.</p> <p>53. EAP Response:</p> <p>The EAP requires clarity on which efficacious mitigation measures or alternative options have not been identified, evaluated or assessed by the EAP in the EIA process because sufficient alternatives have not been considered.</p>
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		<p>54. As such, the failure to apply the first tier (avoidance) of the Impact Mitigation Hierarchy renders the assessment process fatally flawed. Specifically, the following:</p> <p>54.1. The EAP's approach fails to comply with the 'hierarchy of mitigation' (provided for in section 2(4)(a)(i)-(iv) and (viii)) of NEMA, which provides that environmental harms must be avoided if at all possible, and only if they cannot be avoided should those harms be minimised and remedied.</p> <p>54.2. The approach to alternatives whereby the Applicant has posited the present location as a fait accompli is wholly unacceptable to I&APs. It undermines the credibility of the process and the opportunity to meaningfully contribute to the process if I&AP input cannot influence nor affect the most fundamental decision about the acceptability of the overall development (i.e. where it is located). In other words, the development is a fait accompli based on the developer's chosen preference and I&AP input is therefore limited to managing impacts. This is not the level of application of the mitigation hierarchy and public participation envisaged by NEMA and the entire constitutional dispensation</p> <p>IMPACT ON THE GREENVILLE GARDEN CITY DEVELOPMENT</p> <p>55. The Greenville Garden City development has commenced. Phases 1 and 2 have been rolled out with the associated bulk civil and internal engineering services. These phases include the construction of over 2820 BNG houses, an interim 16</p>	<p>The EAP and specialist team have identified alternatives through the implementation of the mitigation hierarchy and a specialist and technical team has evaluated the impacts and formulated mitigation measures. These mitigation measures further informed the preferred alternative and mitigation measures were captured in the EMPr. The statement is also incomplete and cannot be responded to further.</p> <p>54. EAP Response:</p> <p>The EAP is unsure which avoidance the IAP is referring to and cannot respond to this statement. The EAP can illustrate that for numerous environmental aspects steps have first been taken to avoid impacts (for example avoiding high sensitivity terrestrial biodiversity areas). The IAP does however need to be more specific with regards to what impacts they are of the opinion that avoidance was not applied in order for a more detailed response to be provided.</p> <p>54.1. See response above. The EAP requires clarity from the IAP which "harms" are referred to. All remaining impacts (post implementation of the mitigation hierarchy) identified were assessed by specialists and mitigation proposed.</p> <p>54.2 This concern has been addressed above.</p> <p>55. to 60 CWA response:</p>
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		<p>Finance Linked Individual Subsidiary Programme (“FLISP”) housing opportunities, as well as various community and commercial opportunities that have already been completed. External valuation experts Mills Fitchet Magnus Penny (Pty) Ltd conducted a valuation that calculates the following:</p> <p>55.1. The Opportunity Value of all the residential rights;</p> <p>55.2. Phases 1 and 2 serviced in totality; and</p> <p>55.3. Including buildings of those completed.</p> <p>56. The basis of the valuation is the direct comparable sales method which entails the profiling of the subject property against recorded sales of similarly zoned land parcels in order to achieve the likely selling price.</p> <p>57. With respect to the Opportunity Value of all residential rights, Mills Fitchet Magnus Penny (Pty) Ltd calculated the following:</p> <p>57.1. The Opportunity Value of Phase 1, consisting of BNG Housing (1320 units), GAP Housing (581 units), Market Housing (745 units) and Group Housing (1206 units), amounts to a total residential value of R96 300 000.00.</p> <p>57.2. The Opportunity Value of Phase 2, consisting of BNG Housing (2754 units), GAP Housing (71 units) and Group Housing (304 units), amounts to a total residential value of R78 225 000.00. 57.3. 57.4. 57.5.</p> <p>57.3. The Opportunity Value of Phase 3, consisting of BNG Housing (1699 units), GAP Housing (323 units) and Group Housing (258 units), amounts to a total residential value of R57 000 000.00.</p> <p>57.4. The Opportunity Value of future phases, consisting of GAP Housing (916 units), Market Housing (2821 units) and Group Housing (636 units), amounts to a total residential value of R109 325 000.00.</p> <p>57.5. The total Opportunity Value of all residential rights amounts to R340 850 000.00.</p>	<p>The information is a property valuation provided for information purposes and does not relate to the section dealing with the socio-economic impacts or how this valuation addresses the viability and sustainability of the Greenville development. It is unclear what the context for this information is.</p> <p>The valuation was not attached, and it is therefore difficult to comment. The comments do not specify what alternatives were considered to determine Opportunity Value. In addition, it is unclear whether the “recorded sales of similarly zoned land parcels” did include Agricultural-zoned land, which would be relevant for Erf 4 Greenville, given its Agricultural zoning.</p> <p>Garden Cities has chosen to, we can only assume inadvertently, to illustrate by way of financial values, how they are impacted by CWA. It would be appreciated if this valuation can be shared with CWA and the purpose of this valuation.</p> <p>The total impact relates to 59.2 refers to a value of approx. R1.3b, implying that this is the negative impact that CWA will have on it, and justifying its priority based on a large value.</p> <p>The total value, when drilling down into it, is made up of:</p> <ul style="list-style-type: none"> - The opportunity value of all the residential rights R57,000,000 (detailed in 57.3 and applicable to Phase/Parcel 3). - Phases/Parcel 1 and 2 serviced in totality; R228,600,000 and R219,475,000, (detailed in 58 and applicable to Phase/ Parcel 1 and Phase/Parcel 2 - Buildings that have been completed – R791,420,000 (detailed in 59.1. These are the 1320 houses in Phase/Parcel 1 and the 1516 houses in Phase/Parcel2) <p>Total R1,296,495,000 (shown in 59.2)</p> <p>There are clear and obvious errors in the formulas applied, the values that have been duplicated and the Phases/Parcels that are impacted by CWA on the Greenville Development are ambiguous and confusing.</p> <p>It is also the first time that CWA can properly evaluate the Greenville development as plans submitted are the same plans that existed when the application was approved in 2012.</p>
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	<p>58. With respect to the value calculation based on Phases 1 and 2 having been serviced in totality, Mills Fitchet Magnus Penny (Pty) Ltd calculated the following:</p> <p>58.1. The value calculation for Phase 1 escalates from R96 300 000.00 to R228 600 000.00.</p> <p>58.2. The value calculation for Phase 2 escalates from R78 225 000.00 to R219 475 000.00.</p> <p>58.3. The total value therefore escalates from R340 850 000.00 to R614 400 000.00.</p> <p>59. With respect to the value calculation based on the inclusion of those buildings already completed, Mills Fitchet Magnus Penny (Pty) Ltd calculated the following:</p> <p>59.1. The value calculation for those completely built houses, consisting of 2836 units of BNG and FLISP Housing, amounts to a total residential value of R791 420 000.00.</p> <p>59.2. The total opportunity value for all phases, present and future, as well as the value of built houses brings the entire Greenville Garden City development to a total value of R1 193 120 000.00.</p> <p>60. The Greenville Garden City is evidently a development worth over one billion rand, the value and financial feasibility of which is under direct threat by the proposed development. The materiality and significance of this impact is compounded by the existence of an extensive social component to the proposed CWA project that offers thousands of housing opportunities to low income groups of people. The promotion and pursuit of a development such as the proposed CWA (with a range of associated significant adverse environmental impacts on neighbouring residents, communities and landowners) in close proximity to the extensive low-income residential housing in the Greenville development entrenches Apartheid-style spatial planning due to the location of the CWA and the disproportionate impact that such communities will suffer.</p>	<p>What is the Impact of CWA financially on Garden Cities?</p> <p>- Phases/Parcels 1, 2 and 3 are more than 3.2km as the crow flies away from CWA and are not impacted at all by CWA. As an illustrative example, the University of the Western Cape is 3.9km away from the end of the Cape Town International runway. i.e. The opportunity value impacted of all the residential rights should be R Nil (detailed in 57.3 and applicable to Phase/Parcel 3).</p> <p>- Since these Phases/Parcels are not affected, it is irrelevant to say that they are on serviced land. Phases/Parcel 1 and 2 serviced in totality; impacted value should equal R Nil and R Nil, (detailed in 58 and applicable to Phase/ Parcel 1 and Phase/Parcel 2).</p> <p>- Since all the buildings that have been completed are in Phase/Parcel 1 and 2 they are also not affected – R Nil (detailed in 59.1. These are the 1320 houses in Phase/Parcel 1 and the 1516 houses in Phase/Parcel 2)</p> <p>Total impacted value – R Nil</p> <p>It must be noted that CWA also finds it hard to understand that Garden Cities have, obviously incorrectly, included property they don't own, i.e. all the houses completed, and sold, in Phase/ Parcel 1 and 2 in the financial value of their impact.</p> <p>It is also hard to understand that they could not have understood that they cannot include the overall value (i.e. all the houses in that phase, at R25k a house, and then add them again as completed houses valued at R279k. Even though these houses are not affected, there is apparently duplication which inflates values.</p> <p>In comment 85.1 of the document, Garden Cities, clearly states that "The proposed CWA project will fundamentally and adversely affect the sustainability of the future phases (4-7) of the Greenville Garden City development". It has specifically excluded, quite correctly Phases/ Parcels 1-3.</p> <p>It must also be noted and properly emphasised that Garden Cities has reflected no loss of value attached to Phases/Parcels 4 (As described in 57.4) and no loss of value in Parcel/Phase 5 (as there are no rights attached to either of these Phases/Parcels).</p>
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I.e. In their own calculations they have not included any loss of value of any property directly to the south of the 01/19 Runway which is effectively Parcel/ Phase 4 fundamentally agreeing that the rights on Phase/Parcel 4 have lapsed and Phase/ Parcel 5 there are “no application for rights have been initiated”.

Illustration of duplication and errors:

Parcel / Phase 1	R 228,600,000	Profit for the developer in selling low cost houses and cost of servicing land
Parcel / Phase 2	R 219,475,000	Profit for the developer in selling low cost houses and cost of servicing land
Parcel / Phase 3	R 57,000,000	Profit from selling houses in the pipeline (no servicing costs incurred yet)
Parcel / Phase 4*	R -	
Parcel / Phase 5**	R -	
Value of Properties Sold	R 791,420,000	
Total Implied Impact	<u>R 1,296,495,000</u>	

* These rights have lapsed

** Parcel / Phase 5 (No rights have been granted for this so does not make sense to include in the value)

Breakdown of Total Opportunity Value:

The total opportunity value (R228,600,000) is the sum of:

- Profit from Pipeline Houses: R63,300,000 (581 Gap Houses + 745 Market Houses + 1206 Group Houses × R25,000 profit per house).
- Value Allocated to Servicing Plots: R165,300,000.

Pipeline Summary:

- Total Completed Houses: 1,320.
- Total Pipeline Houses: 2,532 (comprising Gap Houses, Market Houses, and Group Houses).
- Total Houses Planned and in Pipeline: 1,320 (completed) + 2,532 (pipeline) = 3,852 houses, matching the approved rights for Phase 1.
- Profit per Pipeline House: R25,000 contributes a significant portion to the opportunity value but is secondary to the servicing costs.

Impact of Servicing Costs on House Value:

- Servicing Cost per Plot: Approximately R65,284.36 is required to make each plot ready for development.

- This cost constitutes 32.64% of the expected original house cost of (R200,000), leaving 67.36% of that value for construction, marketing, and profit. While the current escalated house value is R279,000.
- It appears as though Garden Cities has included the cost of servicing plots that have already been sold in their total impact as the cost of servicing would be nowhere near 33% of the cost of each property.

	Approved rights	Value
Parcel / Phase 1	3852	R 96,300,000
Parcel / Phase 2	3600	R 78,225,000
Parcel / Phase 3	3600	R 57,000,000
Parcel / Phase 4 *	3600	R 109,325,000
Parcel / Phase 5 **		
	<u>14652</u>	R <u>340,850,000</u>

As per the response to paragraph 56 above, the valuation was not provided, making it difficult to comment. The comments do not specify what alternatives were considered to determine Opportunity Value. In addition, it is unclear whether the "recorded sales of similarly zoned land parcels" did include Agricultural-zoned land, which would be relevant for Erf 4 Greenville, given its Agricultural zoning.

Response from H & A Planning: The assertion that "the value and financial feasibility of which is under direct threat by the proposed development," lacks substantiated evidence, particularly in the absence of a provided valuation.

It is possible that the value of the undeveloped land could increase if considered under the highest and best use valuation methodology, but there is no indication that such an approach was part of the brief to the valuer.

While the comments note several negative impacts, they do not acknowledge mitigation measures by CWA and the potential positive outcomes the existing airport extension could bring.

		<p>NOISE IMPACTS</p> <p>61. Noise impacts will be one of the most significant impacts that those surrounding the airport will be forced to endure during the lifespan of the expanded CWA, which impacts are likely to be severe and endure in the long-term. The Noise Impact Assessment by Demos Dracoulides dated October 2024 (“NIA”) falls short of the investigation, evaluation and assessment required in terms of NEMA and the EIA Regulations. The material shortcomings of the assessment reported in the NIA are confirmed by accredited noise specialist, Sound Research Laboratories South Africa (Pty) Ltd (“SRL”), who identified various errors and omissions in the NIA. Attached hereto is the external review</p>	<p>Additionally, the repeated comparison to apartheid-era spatial planning is not productive. On the contrary, the current situation in this area actually replicates apartheid-era spatial planning, where low-cost housing is located far from job opportunities, leading to long commutes and financial strain on residents. Unlike Apartheid spatial planning, this is of course entirely unintended. But sadly, the outcome is the same 30 years into democracy.</p> <p>Prof. Francois Viruly, a well-known property economist, describes this phenomenon as follows:</p> <p>"...the injustice of spatial apartheid could be summed up as a 40x40x40 concept. Low-cost housing developments of 40 square metres are typically located 40 km away from the city centre, and working-class people in these areas who manage to get jobs in the city spend up to 40% of their incomes on transport. By the time households have dedicated some 40% of income on transport, there is very little left over for housing. While it is often argued that households should be spending some 20 to 30% of income on housing, for many South African households that ratio drops to 0%," he explains." (UWC article).</p> <p>CWA’s extension holds substantial potential to tackle these challenges by accelerating economic growth and job creation in this location where housing development has outpaced employment opportunities for more than a decade. This point is further underscored by Garden Cities' comments in paragraph 8.1.</p> <p>61. CWA Response:</p> <p>The assertion that noise impacts from the expanded Cape Winelands Airport (CWA) will be severe and endure in the long term is acknowledged as a concern, but not for areas zoned as residential and owned by Garden Cities. The Noise Impact Assessment (NIA) prepared by Demos Dracoulides in October 2024 adheres to both national and international standards, including the requirements of the National Environmental Management Act (NEMA) and Environmental Impact Assessment (EIA) Regulations. The following points address the concerns raised:</p>
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		<p>of the NIA dated 5 December 2024 prepared by Sound Research Laboratories South Africa (Pty) Ltd (“SRL”) and attached hereto as Annexure C.</p>	<p>The NIA was conducted following the prescribed methodology outlined in NEMA and the EIA Regulations. It employed industry-standard tools and methodologies to assess potential noise impacts thoroughly. Any perceived shortcomings are subjective and will be assessed in light of the independent review.</p> <p>While the review by SRL may in its opinion identified certain alleged errors and omissions, it is important to note that differences in technical opinion are common in specialist studies. These findings will be carefully evaluated, and any substantive issues raised by SRL will be addressed comprehensively in an updated or supplementary assessment if deemed necessary. The commitment to ensuring the accuracy and adequacy of the NIA remains paramount.</p> <p>The NIA is part of a larger EIA process that is inherently iterative. Stakeholder inputs, including concerns raised by SRL, are used in refining and improving the assessment. CWA is fully committed to engaging constructively and ensuring that all findings that are factual are integrated into its decision-making process.</p> <p>Even with the current findings of the NIA, various noise mitigation strategies have been identified and will be implemented as necessary.</p> <p>The concerns regarding potential long-term noise impacts should be considered alongside the significant economic and social benefits of the expanded airport. The development will enhance regional connectivity, create jobs, and stimulate economic growth. Mitigation measures will ensure that these benefits are achieved responsibly and sustainably.</p> <p>In conclusion, while SRL's and Garden Cities comment is an important contribution to the EIA process, it does not diminish the validity of the original NIA. Instead, it underscores the collaborative nature of environmental assessments, where inputs from various experts and stakeholders guide a comprehensive, balanced approach to impact management. CWA remains committed to upholding this standard.</p> <p>Refer response by Noise specialist to Annexure C.</p>
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		<p>62. Our client, specifically, has a direct and substantial interest in the noise impacts of the expanded CWA as the Greenville Garden City Development given that our client and the Greenville Garden City development as a whole stand to be disproportionately impacted by the noise impacts. In this regard see attached hereto Annexure D that outlines the areas of impact of the proposed CWA project on the Greenville development by mlh architects dated September 2023. The status of our client as one of the most directly affected parties is demonstrated in part by the fact that Greenville Garden City is identified as a Discrete Receptor in terms of the NIA, with the proposed CWA project being as close as approximately 1 kilometer south of the Greenville Development. Notwithstanding the queries raised by SRL in their review dated 5 December 2024 concerning the aircraft used in the noise model, to be discussed in greater depth below, the assessment By Demos Dracoulides dated October 2024 highlights the following significant impacts on the Greenville Garden City residential development:</p> <p>62.1. A large area of the Greenville Garden City development and associated landholdings will be exposed to average noise levels that are above the district rating level with no effective mitigation measures to reduce noise levels to ensure compliance with district rating levels proposed;</p>	<p>62. CWA response:</p> <p>The claim that CWA is “approximately 1 kilometre south of the Greenville Development” misrepresents the relative distance of key areas within the GGCD from the operational centre of CWA. Phases/Parcels 1, 2, and 3 are around 3 kilometres away, ensuring they are well outside the significant noise contours of the proposed development. Comparatively, existing developments in closer proximity to operational airports (e.g., the University of the Western Cape) operate effectively without adverse impacts, as demonstrated by existing precedents. Please note CWA is to the North and not the South of the Greenville Development.</p> <p>Response by specialist: In South Africa, there are no specific national regulations that mandate a minimum distance between educational institutions and airports. Proactive planning, informed by noise assessments and strategic land use policies, is essential to safeguard the well-being and academic success of learners.</p> <p>62.1.CWA response: If there are landholdings with no development rights and no buildings on them, they are not impacted landholdings. Existing developments and landholdings with rights are not impacted. The assertion that a large area of the Greenville Garden City development will be exposed to average noise levels above the district rating level without effective mitigation measures overlooks the comprehensive strategies outlined in the Noise Impact Assessment (NIA). These strategies include optimizing aircraft operations, implementing noise barriers and vegetation buffers, and incorporating acoustic insulation for affected buildings. Additionally, land-use planning is being aligned with noise contour mapping to ensure compatibility with anticipated noise levels. While localized impacts are acknowledged, the claim of "large area" exposure lacks quantification, as the noise modelling demonstrates that zones exceeding district levels are specific and localized. The project is committed to ongoing monitoring and iterative mitigation, leveraging new technologies and operational efficiencies to manage noise impacts effectively over time. These efforts are being undertaken in compliance with SANS 10103 and international standards, balancing the need</p>
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		<p>62.2. As a result of the proposed CWA a disproportionately significant area comprising the Greenville Garden City development will be exposed to noise events above 70 dBA over 50 occasions in a 24-hour period. This noise level will have a severe adverse impact on other land uses in the area and specifically various residential areas comprising the Greenville Garden City landholdings and is not permitted by the applicable Western Cape Noise Control Regulations, 2013:</p> <p>62.2.1. 70 dBA is 20 dBA above the daytime district rating level for a residential area. SANS 10103 states that “vigorous community or group action” can be expected for noise levels at 15 dBA above the rating level of 50 dBA.</p>	<p>to address environmental impacts with the significant regional benefits the airport expansion will bring, including enhanced connectivity, job creation, and economic growth.</p> <p>62.2. CWA response: The assertion that a disproportionately significant area of the Greenville Garden City development will be exposed to noise events above 70dBA over 50 occasions in a 24-hour period and that this violates the Western Cape Noise Control Regulations, 2013, warrants clarification. The Noise Impact Assessment (NIA) acknowledges that some areas near the airport may experience elevated noise levels; however, it also outlines mitigation measures to address these impacts effectively. These measures include optimizing flight paths, implementing operational restrictions during sensitive hours, and using quieter aircraft technologies to minimize noise. Furthermore, the Western Cape Noise Control Regulations focus on mitigating and managing noise impacts rather than the absolute prohibition of specific levels in all cases. The NIA adheres to SANS 10103 Standards and incorporates internationally recognized methodologies, ensuring compliance with regulatory requirements. While localized impacts are expected near the airport, they are being addressed within a broader framework of environmental management, ongoing noise monitoring, and stakeholder engagement to minimize disruption. The project balances these considerations with significant regional benefits, including economic growth, job creation, and enhanced connectivity, ensuring that impacts are managed responsibly and sustainably.</p> <p>Specialist response: Firstly, the area experiencing more than 50 N70 events (marked in red in Figure 4-14) covers only a small portion of the Greenville Garden City development. While limited in size, the impact in this area could still be considered significant. Appropriate mitigation measures, such as strategic land use planning and/or structural insulation, can help minimize these effects.</p> <p>However, it is important to note that N70 events are not referenced in the SANS 10103 Code and are neither regulated in South Africa nor internationally.</p> <p>Secondly, the approach of comparing exceedance levels to N70 is flawed. The SANS 10103 Code specifies that exceedances should be assessed using LReq in</p>
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62.2.2. 70 dBA is 13 dBA above the noise limit for a disturbing noise as defined in the Western Cape Noise Control Regulations of 2013 (“Noise Regulations”). The Noise Regulations state that “a person may not allow a disturbing noise to be caused”.13

62.2.3. In order to illustrate the severity of the potential noise impacts on residential land uses we refer to Australian Standard AS2021-2015 which indicates that 70 dBA will likely “interfere with conversation”. In other words, the anticipated noise impacts associated with the proposed CWA project will have a significant and harmful impact on residents, learners in the schools and people in places of worship in the Greenville development. In this regard, see figure below that sets out the Places of instruction, worship and community facilities projects in the short-, medium- and long-terms roll out plan of Greenville Garden City.

relation to the guideline limits, rather than L_{Amax} (which forms the basis of N70) in relation to L_{Req}.

For instance, an event’s L_{Amax} may exceed an L_{Req} guideline of 50dBA by 20dB, yet its L_{Req} could still remain within the guideline limits. Therefore, the attempted comparison is incorrect.

The appropriate comparison should be between the contour lines of the L_{RDN} and the day-night district guidelines, rather than comparing N70 to the district guidelines.

62.2.2 The assertion that noise levels above 70 dBA are "not permitted" by the Western Cape Noise Control Regulations misrepresents their intent. The regulations provide for management and mitigation measures rather than absolute prohibitions. Further, noise above regulatory thresholds do not render an area inherently incompatible with airport operations; instead, it necessitates targeted mitigation and engagement with stakeholders to reduce impacts.

Additionally, the predicted number of noise events exceeding 70 dBA (N70) corresponds to the maximum noise level (L_{Amax}) rather than overall exposure. This level is only reached momentarily during events such as take-offs or landings, rather than consistently. The regulations focus on overall exposure rather than the number of these individual events.

62.2.3 The table highlights the limited progress made by Garden Cities in implementing the planned community facilities within the Greenville Garden City development. A breakdown of the delays and lack of advancement is as follows:

Phase 1 (2020-2025):

Out of 10 planned schools, only one site is under procurement with Public Works, indicating a significant delay in delivering most of these critical educational facilities. With the phase nearing its deadline, this slow progress

PHASE	DESCRIPTION	# of UNITS	STATUS	TIMELINE
PHASE 1	Schools	10	1 site under procurement process with Public Works	2020-2025
PHASE 2	Schools, places of worship/ community facilities	7	1 community facility under procurement process	2020-2025
PHASE 3	Community facility/place of worship	4	Town planning subdivision in process	
PHASE 5	Places of instruction/community	6	Town planning process yet to be initiated	2025-2030

raises concerns about the feasibility of completing the remaining nine schools within the stated timeline.

Phase 2 (2020-2025):

This phase plans seven units, including schools, places of worship, and community facilities. However, only one community facility has entered the procurement process, leaving the remaining six units unaddressed. This signals a lack of proactive planning or implementation despite the tight timeline.

Phase 3:

For the four planned units (community facility/place of worship), progress is still at the town planning subdivision stage, with no indication of concrete steps toward actual development. The absence of construction or procurement processes at this stage reflects a critical delay.

Phase 4:

Similarly, for the six planned units (places of instruction/community), the town planning process has yet to be initiated. This demonstrates a complete lack of progress despite this phase being scheduled for 2025-2030. It is also inconceivable that any schools will be built here before the housing is started and based on comment 34 with respect to the current rate of development of housing, Phase/ Parcel 4 will only be tackled in the year 2067.

The overall picture indicates significant delays in implementing critical social infrastructure, particularly for Phases 1 and 2, which should already be in advanced stages. These delays could undermine the community's access to essential facilities and services, including schools and places of worship, while creating a gap between promised development and actual delivery. This lack of progress may call into question Garden Cities' capacity to meet its obligations within the Greenville Garden City development timeline, raising concerns about the prioritization of these essential projects

		<p>62.3. The Demos Dracoulides dated October 2024 concludes that residential and school use is “incompatible” with the proposed CWA land use, despite early phases of the Greenville development being far along in the development process.</p> <p>63. The No-Go scenario in the NIA is approached in terms of the current scenario of the airport as it stands without any further development. The No-Go scenario is misleading to the overall assessment of impacts of the CWA when in operation due to the misrepresentation of the No Go scenario in the NIA as a fully operational airport. In this regard we submit the following:</p> <p>63.1. On page 1-12 the No-Go scenario is described as “existing runways at full capacity” where it refers to four “existing runways” and a “typical busy day”. This is misleading as the NIA fails to indicate that two of the four runways are, in fact, currently not in use, with one track operating as a go-cart track of sorts. Therefore, a typically busy day, contrary to what is asserted by the NIA, presently involves the use of light aircraft on two</p>	<p>62.3 CWA agrees with the statement that residential and school use should not be put in areas where there are noise restrictions.</p> <p>63. CWA response: The "no-go" alternative represents a realistic utilisation of the current CWA runway system. This is considered a valid representation of the worst-case scenario under the current authorisation that the CWA has.</p> <p>This worst-case scenario of the current runway system utilisation was selected in order to compare it against the worst-case, i.e. maximum, utilisation of the new CWA runway.</p> <p>The CAA, as the competent authority; will allow the use or alternate the four existing runways in any combination, this based on demand and operational requirements. By not using a runway for a period of time you are not precluded from putting it back into operation, with protocols and procedures to comply with.</p> <p>In the event of a no-go CWA will be forced to use all four runways at maximum capacity to deal with growing demand. It is not uncommon to decommission a runway and then use it for a related activity i.e. parking of aircraft, should conditions change or dictate the runway can be re-commissioned for landing and taking off of aircraft.</p> <p>Historically the airport was built with four runways to allow aircraft to land and depart regardless of the prevailing wind conditions at any given time. These four runways were there from day one of the opening of the airport some 80 years ago. At no stage did the airport decide or communicate that it will permanently decommission any particular runway or runways. All rights have been retained and remain unchanged.</p> <p>63.1 CWA response: The "no-go" alternative represents a realistic utilisation of the current CWA runway system. This is considered a valid representation of the worst-case scenario under the current authorisation that the CWA has.</p>
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runways, go-karts on the third and the fourth not being used. The No-Go scenario is thus misrepresented as the impacts associated with the current capacity of the CWA pre-development are materially less significant and severe.

63.2. On page 4-17 the No-Go scenario is described as “existing operations at full capacity”. The full capacity number of flights predicted in Table 4-5 is a round number of operations (100 arrivals + 101 circuits + 100 departures). The level of activity indicated in the NIA is worlds apart from the actual current use of the airfield: Two of the four runways are not in use for the purpose of aircraft with one of those runways being used as a go-kart track. To this end, please see figure below that indicates the two runways in use and the two derelict runways (one of which being used as a go-kart track), as evidenced below.

This worst-case scenario of the current runway system utilisation was selected in order to compare it against the worst-case, i.e. maximum, utilisation of the new CWA runway.

The CAA, as the competent authority; will allow the use or alternate the four existing runways in any combination, this based on demand and operational requirements. By not using a runway for a period of time you are not precluded from putting it back into operation, with protocols and procedures to comply with.

In the event of a no-go CWA will be forced to use all four runways at maximum capacity to deal with growing demand. It is not uncommon to decommission a runway and then use it for a related activity i.e. parking of aircraft, should conditions change or dictate the runway can be re-commissioned for landing and taking off of aircraft.

Historically the airport was built with four runways to allow aircraft to land and depart regardless of the prevailing wind conditions at any given time. These four runways were there from day one of the opening of the airport some 80 years ago. At no stage did the airport decide or communicate that it will permanently decommission any particular runway or runways. All rights have been retained and remain unchanged.

63.2 Specialist response: The current CWA runway system has authorisation, which allows the utilisation of the airport as indicated in the No-Go alternative.

One of the key best practice recommendations for aircraft noise impact assessments is to compare scenarios under the "worst-case" operational conditions for each authorized or proposed phase.

The "no-go" alternative represents a realistic maximum utilisation of the current CWA runway system. This worst-case scenario of the current runway system utilisation was selected in order to compare it against the worst-case, i.e. maximum, utilisation of the new CWA runway.



63.3. The noise survey data for the area confirms that the current use of the airfield is different to that which is indicated in the NIA: The noise monitoring position MP01 on the airfield measured a noise level of LAeq 54 dBA over two days which is not consistent with a busy airfield. On page 3-4 the MP01 describes the main noise sources as limited to “light aircraft flights, occasional vehicular traffic, nature sounds and limited human activity”.

63.3 Response from specialist:

The MP01 accurately captured the current noise environment at the airfield. Monitoring points within airport sites are routinely utilised for the assessment of the noise increase over the years, for the identification of very noisy aircraft that may exceed emissions limits, correlating noisy events or complaints to specific aircraft operations, and may other useful collection of statistics.

Scenario 1 (No-Go alternative) is for the authorised current runway system at capacity. This will be the worst-case scenario of the current runway system in terms of noise generated.

This current worst-case scenario was selected in order to compare similar worst case scenarios between the current runway system and the new proposed runway.

		<p>63.4. In light of the above, it is clear that the No-Go scenario evaluated for the purposes of the environmental assessment is not, in fact, the current scenario but rather an imagined maximum possible capacity scenario as a means to inflate the current use of the airfield and associated noise levels to mislead I&APs into thinking that the proposed development of the existing CWA to a full commercial international airport would not seem as large an increase and/or give rise to a significant increase in impacts. The current airfield as it stands is a quiet area with measured noise levels far below the No-Go scenario.</p> <p>64. SRL confirmed in the external review that the scenario in the NIA concerning the proposed CWA in its first year of operation has no relevance to the application as the proposed CWA project is in fact a fully developed airport. The inclusion of the scenario contributes to the above argument that the applicant seeks to mislead I&APs into thinking that the increase of the airport from its current use to a fully commercial international airport would not seem as large nor stark an increase by attempting to show a phased build up towards the expanded CWA being applied for.</p>	<p>63.4</p> <p>Specialist response: The No-Go scenario (Scenario 1) evaluates environmental impacts under the assumption that all existing infrastructure, including the four runways, could operate at their full potential, a standard practice in Environmental Impact Assessments (EIAs) to establish a conservative baseline for comparison.</p> <p>The No-Go alternative represents a realistic utilisation of the current CWA runway system. This is considered a valid representation of the worst-case scenario under the current authorisation that the CWA has.</p> <p>The noise monitoring performed at the various areas represent the baseline noise environment. Scenario 1 is different than the baseline, as it represents the current authorisation of the CWA at full capacity.</p> <p>64. CWA Response:</p> <p>The claim that the inclusion of the first-year scenario in the Noise Impact Assessment (NIA) is misleading or irrelevant misrepresents the intent and standard methodology of the noise modelling process.</p> <p>Phased development is an integral part of the proposed Cape Winelands Airport (CWA) project design, with operational activity increasing incrementally over time. Including the first-year operational scenario in the NIA reflects industry best practices, as it allows Interested and Affected Parties (I&APs) to understand the gradual progression of impacts rather than assuming an immediate leap to full-scale operations.</p> <p>The inclusion of various scenarios, such as first-year operations, intermediate phases, and full build-out, demonstrates transparency and responsibility in noise modelling. This approach provides stakeholders with a comprehensive understanding of impacts at different stages and ensures that appropriate mitigation measures can be implemented as the airport develops. Excluding early-phase scenarios would present an incomplete picture, undermining informed decision-making.</p>
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		<p>65. The operations modelled by Demos Dracoulides with reference to the expanded CWA at operating capacity in the NIA dated October 2024 do not match, firstly, the stated use of the airfield in the media and, secondly, the similar uses of the Cape Town International and Lanseria Airports (to which the proposed CWA project claims to be similar). In this regard we submit the following:</p>	<p>The first-year scenario is valuable for illustrating baseline noise impacts during initial operations. It serves as an essential point of comparison to evaluate the difference between early-phase impacts and full-scale operations. Additionally, this scenario informs the phased development of mitigation strategies. The inclusion of this information is not an attempt to mislead I&APs but reflects standard Environmental Impact Assessment (EIA) practices that promote responsible and realistic assessments.</p> <p>Similar projects globally and within South Africa routinely include phased scenarios in their NIAs to demonstrate the evolution of impacts over time. This approach aligns with guidance from organizations such as ICAO and local regulatory frameworks, ensuring that noise impacts are evaluated progressively. This practice benefits I&APs by providing a clear view of how impacts will be managed and mitigated as operations expand.</p> <p>The inclusion of the first-year operational scenario is essential for a robust and transparent impact assessment process. It enables a clearer understanding of how impacts evolve, facilitates adaptive mitigation measures, and complies with industry and regulatory standards. Misinterpreting this as an attempt to downplay the scale of development disregards established methodologies and undermines the benefits of phased analysis for both the community and the project.</p> <p>65. Response by CWA:</p> <p>The comment by Garden Cities on the Noise Impact Assessment (NIA) regarding the operations modelled for the expanded Cape Winelands Airport (CWA) misinterprets the scope and intent of the assessment and overlooks key regulatory and methodological considerations.</p> <p>The NIA provides a comprehensive evaluation of noise impacts based on expected and reasonable operational scenarios for the expanded CWA. Modelling aircraft types that will form the bulk of operations ensures the assessment is relevant, while occasional operations of larger aircraft, if they occur, would have negligible influence on overall noise impacts. Claims of misrepresentation are unfounded, and the methodology aligns with best practices for environmental assessments.</p>
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levels must be calculated logarithmically and scaled proportionately to each measurement duration. As this is a fundamental acoustic error it renders the credibility of the overall assessment in the NIA as questionable, incomplete and inaccurate. For example, MP05 daytime noise levels are recorded as 39.0 and 43.5 dBA with the Overall stated as 41.2 dBA. This is (incorrectly) the arithmetic means. The correct overall should be 41.8 dBA.

66.6. On page 3-6 of the NIA: the noise monitoring in Fisantekraal for the purposes of the assessment was conducted on the 2022 Easter weekend, with MP04 on top of a local residence. The report mentions that the daytime noise levels measured on Sunday 17 April 2022 was notably loud but makes no mention of the weekend being Easter weekend. The report fails to mention that the daytime noise levels might have been an unusual scenario of Easter Sunday festivities. The whole weekend was quite possibly unusual noise monitoring conditions. The Easter weekend should have been avoided for “typical” noise level measurements. If the survey had to be done on the Easter weekend, then the reason(s) for this should be explicitly and transparently stated and the uncertainty of the data should be reported. The NIA fails to explain or justify the approval or the methodology adequately.

66.7. Page 4-1 of the NIA: In relation to construction noise, BS 5228-I (1984) is used in the NIA as the basis for the modelling methodology for the construction noise anticipated in connection with the proposed CWA development. This standard is outdated, with the most recent and applicable version being BS 5228-I:2009+A1:2014. Accordingly, the

close. The term “overall” does not attempt to indicate the logarithmic average of the intermitted measurements but an indication of the applicable district level. It should also be noted that this “overall” level can be considered a worst-case, as it points to a lower level than the logarithmic average, and thus to a stricter noise baseline.

The fundamental acoustic principles and logarithmic adjustments are applied elsewhere in the NIA where required, and any discrepancy does not materially alter the outcomes of the impact analysis.

66.6 Specialist response: Noise monitoring conducted during the Easter weekend, while potentially atypical, does not invalidate the data. The NIA accounts for variability in noise levels and adjusts modelling parameters to reflect long-term averages rather than isolated events. The decision to conduct surveys on specific dates is a practical consideration and does not undermine the broader conclusions of the assessment.

The monitoring was performed from the 14 to 22 April 2022, i.e. more than 7 days. This includes days that were not affected by the loud music and increased human activities.

The report states: “It can be seen from Figure 4 2 that the daytime noise levels were maintained between 55 dB(A) and 60 dB(A), with some exceptions, primarily on Sunday the 17th of April due to increased human activities and loud music.”. This acknowledges that the Sunday 17th noise levels were higher than the levels of the other monitoring days.

The conclusion that the area’s noise levels (excluding those from the 17th) exceeded the SANS guideline levels for Urban Residential Districts is considered valid.

66.7 Specialist response: The use of BS 5228-I (1984) for construction noise modelling is a valid concern, as a more recent version exists. However, this does not invalidate the results, as the fundamental principles remain consistent between versions and the sound power of the equipment remain very similar. The resulting sound levels are that of a typical mix of construction

incorrect standard has been applied which further undermines the efficacy of the noise modelling undertaken and reported on in the NIA.

66.8. Page 4-4 of the NIA: A “typical busy day” is presented as the very round number of $100+100+101 = 301$ operations. This is in contradistinction to the NIA’s noise survey levels and observations of the site that identified the “main noise sources” as being “limited light aircraft flights”. The split in aircraft identified that the vast majority of landing and take off operations (157 of 200) will specifically be Cessna 172R aircraft. The report fails to justify this and provides no plausible or rational explanations of whether this is a true reflection of nearby airfields and the types of aircraft used.

66.9. Page 4-7 of the NIA: The NIA attempts to equate the fully operational airport activities of the expanded CWA to the imagined operational levels of the current derelict airfield by comparing the number of operations. By stating that the fully operational airport “peak general aviation traffic under Scenario 3 will not exceed the current maximum operational capacity of Scenario 1” creates an assessment that is incredibly misleading as it implies that the noise from a Cessna 172R aircraft is the same as the noise from a Boeing 777. In reality, the significant difference between Scenario 1 and Scenario 3 is an increase from zero large commercial aircraft (in terms of the airfield’s existing use and operation) to 52 large aircraft operations per day with three of those estimated to take place between 22h00 and 6h00.

equipment, assuming that all operate at the same time. Updating to the latest standard may result in marginal changes of the sound power levels, but would certainly yield similar conclusions.

66.8 Specialist response: The modelling of a “typical busy day” at 301 operations is a hypothetical maximum capacity scenario designed to assess the worst-case impacts. This approach aligns with standard EIA practices and ensures conservative, comprehensive impact evaluation. The Garden Cities comment of Cessna aircraft numbers is irrelevant to noise assessments, as the report focuses on the total volume of operations rather than aircraft type distributions.

The number of flights and the type of aircraft for the typical busy day, which represents the worst-case for each of the scenarios, were identified as part of the very detailed study: “NACO, ATNS, NLR, 2023. Development of an Airspace CONOPS for the Cape Winelands Airport. 02 November 2023.”. This study is available as part of the EIA and provided the input for the noise modelling.

66.9 - 66.10 CWA and specialist response: The Garden Cities comment conflates the general aviation operations modelled in Scenario 1 with the expanded operations in Scenario 3. The NIA transparently compares these scenarios, and the inclusion of larger commercial aircraft in Scenario 3 reflects a clear and realistic expansion plan. The assertion that noise levels are understated is speculative and unsupported by evidence. The modelling demonstrates compliance with SANS and ICAO guidelines.

The comment misinterprets the Noise Impact Assessment's (NIA) comparison between Scenario 1 (current maximum operational capacity) and Scenario 3 (fully operational CWA). The statement that general aviation noise levels under Scenario 3 will be lower than those under Scenario 1 refers specifically to the proportionate contribution of general aviation operations, not the cumulative noise impacts of all operations. The NIA clearly accounts for the

66.10. Page 4-7 of the NIA: The NIA statement that “at any given moment in time after the opening year of the new runway, the noise levels due to the general aviation operations will always be lower than those with the existing operations at full capacity” is materially false and disproved by the assessment itself. Figure 4-8 of the NIA shows that predicted noise levels for the supposed Scenario 1, while Figure 4-13 shows noise levels for the operational airport (Scenario 3) which clearly show higher noise levels than Scenario 1. To this end, and in support of this concern, see figure below.



66.11. Page 4-8 of the NIA: Table 4-8 shows that the number of large commercial aircraft proposed to take off and land at the proposed CWA is expected to be 52 per day. Note that the noisier Airbus A380 – specifically advertised in the press as an aircraft to be catered for by the longer runway mentioned previously- is not included in this list. This list also does not include the Airbus A350 even though it is used in press releases regarding the current aircraft landing at Cape Town International Airport. These are material omissions which negate the relevance of the assessments undertaken.

introduction of larger commercial aircraft and their associated noise levels in Scenario 3.

The included noise contour maps further illustrate the modelled outcomes. The left map outlines district noise level guidelines per SANS 10103, indicating urban residential areas set at 55 dBA, while the right map highlights noise contours under Scenario 3. These visuals demonstrate areas exceeding district noise limits by 5–10 dBA and over 10 dBA, particularly affecting the Greenville Garden City residential area. The maps support the conclusion that noise levels under Scenario 3 will exceed those under Scenario 1, especially due to the introduction of larger aircraft.

However, this is not contradictory or misleading as the NIA explicitly models these impacts and assesses them within regulatory frameworks. Furthermore, mitigation strategies are proposed to address these noise exceedances, including operational adjustments and noise management plans. The Garden Cities comment's assertion of misleading comparisons fails to acknowledge the NIA's transparency and adherence to regulatory and methodological standards.

66.11 CWA and specialist response: The exclusion of larger aircraft like the Airbus A380 or A350 is not a material omission. These aircraft represent exceptions, not the norm, for operations at CWA. The modelling focuses on fleet mixes likely to dominate operations, providing a robust and relevant assessment of expected impacts.

The A380 complies with stricter noise regulations and produces lower noise levels during take-off and landing compared to the 777. This is partly due to its quieter Rolls-Royce Trent 900 or Engine Alliance GP7200 engines, and its overall design focused on noise reduction.

The 777, while quieter than many older aircraft, has higher external noise levels, particularly for the older 777-200 and 777-300 models. The newer 777X has improved significantly in this regard, incorporating quieter engines and airframe design.

66.12. Page 4-11 of the NIA: The NIA fails to indicate that the prevailing southeasterly winds require the noisier take-off operations to take place over the Greenville Garden City residential area 61% of the time.

66.12 CWA and specialist response: The comment highlights the impact of prevailing southeasterly winds, noting that take-off operations will occur over the Greenville Garden City residential area 61% of the time. However, it is important to recognize that airplanes always take off into the wind to optimize performance and safety. This operational principle means that higher-level engine operations, such as the initial climb phase, for the majority of the time, will occur more than 5 kilometres away from Greenville Garden City, significantly reducing the direct noise impact over the residential area. The NIA appropriately considers the proximity of the runway and accounts for standard aviation practices in its noise modelling, ensuring an accurate representation of operational impacts. The assessment also acknowledges prevailing wind conditions and their influence on flight patterns, incorporating these variables into the noise contour analysis to provide a realistic evaluation of potential noise impacts on Greenville and other nearby areas.



		<p>66.13. Page 4-24 of the NIA: The assessment shows the day-night level LRdn with contours starting at 55 dBA and not at 50 dBA. The district noise level in SANS 10103 is LRdn 50 dBA for a suburban area with little road traffic. Why is the 50-55 dBA area not shown, since this is an area that exceeds the zone noise limits in SANS 10103? Figure 4-13 shows a large area in the Greenville residential area that will exceed the 50 dBA rating level by up to 10 dBA and an area that exceeds the rating level by over 10-20 dBA.</p> <p>66.14. Page 4-25 of the NIA: An N70 noise event is a noise level at least 20 dBA above the district daytime rating level. This meets the definition of a disturbing noise in the Noise Regulations, and according to SANS 10103:2008 "vigorous community or group action" can be expected. AS2021:2015 states that noise levels above 70 dBA are likely to "interfere with conversation". This is undisputedly a disruptive noise event which is indicative of the severity of the potential noise impacts. Figure 4-14 of the report shows that there are large areas in the Greenville Garden City residential area where more than 50 of these disruptive events 27 (above 70 dBA) are expected to occur every single day. This will have a significantly harmful impact on the Greenville residential area that includes education facilities and places of worship.</p>	<p>66.13 CWA and specialist response: The decision to begin contours at 55 dBA reflects regulatory thresholds and ensures consistency with SANS 10103. Including lower-level contours is not required and would not materially alter the findings, as areas within the 55-65 dBA range remain central to the analysis.</p> <p>66.14 CWA and specialist response: While it is acknowledged that N70 events represent noise levels exceeding 70 dBA and may potentially interfere with conversation, the context and interpretation of this metric must be carefully considered in light of standard aviation practices and the methodology applied in the Noise Impact Assessment (NIA).</p> <p>Firstly, the NIA adheres to internationally recognized standards for noise assessment, including SANS 10103:2008, which provides a framework for understanding the relationship between noise levels and community responses. The reference to "vigorous community or group action" is a generalized guideline rather than a guaranteed outcome, and such responses depend heavily on the context, duration, and frequency of noise events, as well as existing community dynamics.</p> <p>Secondly, while Figure 4-14 of the NIA indicates areas within Greenville Garden City experiencing more than 50 N70 events daily, this must be balanced against several mitigating factors. These include the operational design of the proposed airport, prevailing wind conditions, and take-off patterns that ensure aircraft are climbing and moving away from residential areas. As noted in Comment 66.12, the initial climb phase, where engine operations are at higher levels, occurs more than 5 kilometres away from Greenville Garden City, substantially mitigating the intensity of noise exposure at ground level.</p> <p>Moreover, the NIA emphasizes that noise contour mapping and event frequency are not isolated indicators of severe impact. They are part of a comprehensive analysis that includes the duration of exposure, the effectiveness of noise insulation, and community-specific factors. It should also be noted that educational facilities and places of worship are recognized</p>
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		<p>66.15. Page 5-31 of the NIA: The recommendation for noise control measures is not in accordance with the Noise Regulations and must therefore be rejected outright. Regulation 4 of the Noise Regulations requires clear mitigation measures to be included in a noise management plan “before the application is decided”.¹⁶ The NIA, on the other hand, recommends that an investigation “should be initiated before the full capacity of the runway is reached”.¹⁷ Incremental and piecemeal assessment flies in the face of sound environmental management envisaged in section 24 of the Constitution and NEMA.</p>	<p>as sensitive receptors in the assessment, and their specific exposure levels have been carefully evaluated to ensure compliance with regulatory thresholds.</p> <p>In conclusion, while N70 events are indicative of potential noise impacts, the broader context provided by the NIA demonstrates that these impacts are managed through operational measures and strategic planning. Additionally, noise mitigation strategies such as sound insulation, operational restrictions during sensitive hours, and community engagement programs are part of the ongoing process to address and minimize these impacts effectively.</p> <p>66.15 CWA and specialist response: The assertion that the recommendations for noise control measures in the Noise Impact Assessment (NIA) are inconsistent with the Noise Regulations and should be rejected outright does not accurately reflect the intent and methodology of the NIA, nor the flexibility provided within the regulatory framework.</p> <p>Regulation 4 requires a noise management plan with clear mitigation measures to be included prior to decision-making. The NIA complies with this requirement by providing a detailed framework for managing noise impacts, including identifying sensitive receptors, outlining operational controls, and recommending phased noise monitoring and management strategies. The recommendation to initiate further investigations as the runway approaches full capacity reflects the adaptive management approach endorsed by NEMA, ensuring that mitigation remains proportional to actual operational impacts rather than theoretical projections.</p> <p>The recommendation to conduct additional investigations as the runway reaches full capacity is not “piecemeal” but instead represents a pragmatic and evidence-based approach to environmental management. Section 24 of the Constitution and NEMA emphasize sustainable development and the principle of adaptive management, which entails ongoing monitoring and refinement of mitigation measures as new information becomes available. This approach is particularly critical in aviation, where noise impacts can vary significantly based on changes in aircraft technology, fleet composition, and operational patterns over time.</p>
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		<p>66.16. Page 5-31 of the NIA: Notwithstanding the various serious concerns highlighted in this section (and supported by the external review by SRL concerning the aircraft types modelled and times of flights), the assessment rates the impact significance as “High” with high confidence in Table 5-4. The impacts significance of High – despite various gaps – is indicative of a severe and irreversible impact. The NIA claims that with mitigation the impact significance is reduced to “Medium” with high</p>	<p>Implementing extensive mitigation measures prematurely, before the airport operates at or near full capacity, risks unnecessary costs and inefficiencies. Incremental assessments and adjustments ensure that noise management remains both effective and economically viable, in line with the principles of proportionality and reasonableness central to sound environmental governance.</p> <p>Far from undermining sound environmental management, incremental and phased assessments enable a more accurate and responsive approach to environmental impacts. This aligns with NEMA’s goal of fostering an integrated and dynamic approach to environmental decision-making. The NIA provides a robust baseline assessment and a clear pathway for iterative management, ensuring compliance with both current regulatory requirements and future operational realities.</p> <p>The NIA does not advocate delaying mitigation but rather proposes a phased implementation plan that ensures continuous alignment with actual noise levels and community needs. Additionally, commitments to ongoing stakeholder engagement, monitoring, and periodic reviews are embedded in the proposed noise management framework, ensuring accountability and compliance with constitutional and regulatory obligations.</p> <p>In conclusion, the recommendations in the NIA are consistent with the Noise Regulations, NEMA, and the Constitution. They reflect a thoughtful, evidence-based, and sustainable approach to noise management, ensuring that mitigation measures are both effective and adaptive to the evolving operational context of the airport. Rejecting this approach in favour of rigid and premature measures would undermine the principles of sound environmental governance and sustainable development.</p> <p>66.16 CWA and specialist response: The assessment of impact significance as “High” with mitigation reducing it to “Medium” reflects a realistic acknowledgment of the challenges posed by the project. The Garden Cities comment mischaracterises this as an oversight when it is, in fact, evidence of a thorough and transparent evaluation process.</p>
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confidence, despite the various shortcomings of these mitigation measures that fail to offer any noise reduction, as discussed in greater depth below.

67. The NIA offers a list of unproven, untested, unassessed and vague noise mitigation methods that fail to offer proven noise reduction, despite the noise impact rating's significance being inexplicably reduced from "High" to "Medium" in light of the mitigation methods offered. In this regard we submit the following:

The location of the CWA airport provides several opportunities, in terms of the reduction of the aircraft noise impacts from the airport. According to international best practise these are based on:

- Operational procedures: Noise abatement procedures (NAPs) are sets of guidelines and standard operational procedures designed to reduce noise in areas close to airports. They typically include specified flight paths, altitude requirements, and operational settings that pilots should follow during take-off and landing.
- Noise Contour Mapping: Utilizing these maps identification of areas with significant noise exposure can guide decisions on future residential development.
- Land Use Planning: Implementation of zoning regulations that restrict sensitive land uses can prevent future noise-related issues.
- Sound Insulation Measures: For existing sensitive receptors near airports, investing in soundproofing infrastructure can reduce the indoor noise levels.

67. CWA & Specialist Response:

The NIA's mitigation measures are not unproven or speculative; they align with best practices in airport noise management and reflect a multifaceted approach to reducing impacts. While some measures require further detailed planning and consultation with relevant authorities, this is standard for large-scale infrastructure projects. The reduction in impact significance from "High" to "Medium" reflects the cumulative effect of these measures, consistent with established methodologies for impact assessment. The critique fails to acknowledge the practical application of these measures and their role in balancing operational needs with environmental and community considerations.

The comment on the Noise Impact Assessment (NIA) and the proposed noise mitigation measures misunderstands the purpose and scope of the mitigation strategies. Noise mitigation measures are often a combination of operational, regulatory, and infrastructural strategies aimed at reducing impacts as much

		<p>67.1. Mitigation 1 “encourage airport compatible land-use planning via... establishing compatible land use (such as industrial and commercial) to be located around the airport facilities” and “directing incompatible land use (such as houses and schools) away from the airport environs and the runway alignments”.¹⁸ The NIA confirms that the airport is not compatible with residential and educational uses despite those already being in existence in the Greenville Garden City development. As such, this mitigation measure is a non-starter as the residential and educational land uses cannot be directed away from the CWA. Given the existing Greenville Garden City – in all its composite phases – the suggestion that the impact can be mitigated through directing incompatible land uses elsewhere is futile. How does the applicant proposed to achieve this?</p> <p>67.2. Mitigation 2 “provide incentives for airlines to obtain aircraft with the latest available noise reduction technology, through for example noise-related landing charges”.¹⁹ The NIA fails to give a dB reduction figure for the vague suggestion that airlines will be taxed on their noise levels. The NIA further fails to offer any indication of what this tax may be and so the reader is unable to determine how strong of an incentive it will be for airlines. This mitigation measure is therefore tantamount to window-dressing. The efficacy of the proposed mitigation measure is untested and not proven in a scientifically defensible manner. The mitigation hierarchy has not be adhered to and the assessment (and mitigation identified) are inadequate.</p>	<p>as feasibly possible, recognizing that complete elimination of noise impacts in the vicinity of an airport is inherently challenging. Addressing each point:</p> <p>67.1 The suggestion to encourage airport-compatible land-use planning is forward-looking and aligns with best practices in airport development globally. While it is true that Greenville already exists as a residential and educational area in Phases/ Parcels 1 and 2, which are at up to 4km to the west of the CWA realigned runway 01/19, does not render the mitigation irrelevant. Future planning efforts can still aim to prevent incompatible land uses, where there are indeed conflicts, from being introduced closer to the airport. The comment misrepresents this mitigation as an attempt to retroactively move Greenville, which is not the intention. Instead, it serves as a broader policy recommendation for long-term planning and zoning to minimize conflicts between land use and airport operations.</p> <p>67.2: The assertion that the recommendation for noise-related landing charges is "window-dressing" and unsupported by scientific evidence misrepresents the purpose and context of this mitigation measure. While the Noise Impact Assessment (NIA) does not provide specific dB reduction figures or precise tax amounts, this does not undermine the validity or feasibility of the proposed measure. Instead, it reflects the preliminary nature of the recommendation, which requires further refinement and stakeholder engagement during the implementation phase.</p> <p>Noise-related landing charges are a globally recognized and widely implemented strategy to incentivize airlines to adopt quieter aircraft technologies. This approach aligns with international best practices, such as those employed at major airports in Europe and elsewhere, where noise-based charging schemes have demonstrated measurable success in encouraging fleet modernization and reducing overall noise exposure. The measure is not “untested” but is, in fact, supported by substantial precedent in the aviation industry.</p>
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		<p>67.3. Mitigation 3 “consider the use of specific take-off or approach procedures... to minimise and optimise the distribution of noise on the ground”. 20 The NIA fails to indicate that any changes to the flight paths must be approved by the relevant authority and must be modelled to assess whether this yields any meaningful reduction in noise levels at the affected areas. Unless and until this happens the assessment is speculative and flawed.</p> <p>67.4. Mitigation 4 “use noise preferential routes to assist aircraft in avoiding noise-sensitive areas, such as Klipheuwel, on departure and arrival, and the use of turns to direct aircraft away from noise-sensitive areas”. 21 The NIA fails to indicate that any changes to the flight paths must be</p>	<p>While the exact financial structure and potential dB reductions are not detailed in the NIA, this is because such specifics are determined through consultation with key stakeholders, including airlines, regulatory authorities, and airport operators, and are influenced by local economic and operational conditions. The lack of immediate specifics does not invalidate the recommendation; rather, it reflects a logical progression from conceptual mitigation strategies to detailed, context-specific implementation.</p> <p>The mitigation hierarchy has been adhered to by prioritizing avoidance and minimization of noise impacts through operational measures, followed by the exploration of incentives and technological advancements. Noise-related landing charges form part of a broader noise management framework and are not intended to operate in isolation. They complement other operational and infrastructural noise mitigation measures outlined in the NIA.</p> <p>In conclusion, the inclusion of noise-related landing charges as a mitigation measure is neither inadequate nor unscientific. It reflects a proven, internationally recognized approach to noise management. Further refinement and consultation will ensure that the measure is effectively tailored to the specific operational and economic context of the airport, delivering meaningful noise reductions and incentivizing sustainable aviation practices.</p> <p>67.3 The recommendation to consider specific take-off or approach procedures is a widely recognized noise mitigation strategy. The NIA acknowledges that any changes to flight paths require regulatory approval and detailed modelling to assess their impact. This measure is not speculative but reflects a proactive approach, highlighting the potential for noise reduction through operational adjustments. While precise outcomes depend on further analysis, the inclusion of this measure aligns with adaptive management principles and demonstrates a commitment to responsible noise mitigation.</p> <p>67.4 The use of noise preferential routes is a standard and effective noise mitigation strategy, recognized globally for reducing impacts on noise-sensitive areas. The NIA appropriately identifies this measure as a potential</p>
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		<p>approved by the relevant authority and must be modelled to assess whether this yields any meaningful reduction in noise levels at the affected areas.</p> <p>67.5. Mitigation 5 “consider approaches at slightly steeper angles. A small increase in the glide path angle to 3.2 degrees, rather than the standard 3 degrees, may be feasible and offer scope for noise reduction”.²² The feasibility of this measure has evidently not been assessed. According to the external review by SRL, an increase in glide-path angle only helps on approach, not on the 61% use case of take-off over the Greenville residential area. An increase of 0.2 degrees is equivalent to an increase of 11 metres from 157 metres to 168 metres above ground level at 3 kilometres from landing. This is a negligible increase in distance that will not offer adequate mitigation.</p> <p>67.6. Mitigation 6 “establish and maintain effective communication channels with the affected public and provide real-time information on incoming and outgoing flights and their evolving noise footprints”.²³ This is not a noise mitigation method and alerting residents to a high noise impact in no way mitigates that noise. The EAP is requested to provide a rational and reasonable basis as to why this is considered as a meaningful mitigation measure when clearly it cannot in any way resolve or address the impact.</p> <p>67.7. Mitigation 7 “consider noise-related operating restrictions for night-time. These can be imposed on a voluntary basis by the airport, or by the Government”.²⁴ A voluntary means of mitigation is not acceptable and does not in any way offer confidence that noise levels will be adequately mitigated.</p>	<p>tool, acknowledging that implementation requires regulatory approval and modelling by aviation authorities. This does not invalidate the measure but reflects the necessary steps for its detailed evaluation and execution.</p> <p>By proposing noise preferential routes, the NIA highlights a proven approach to minimizing noise impacts, pending further analysis and approval. This aligns with best practices and demonstrates a commitment to exploring all feasible mitigation options to reduce noise exposure in affected areas.</p> <p>67.5: The suggestion to consider steeper approach angles, such as increasing the glide path angle to 3.2 degrees, is a valid mitigation technique. While the critique argues that this measure is negligible, it misunderstands the cumulative impact of such adjustments. Even small increases in altitude during approach can significantly reduce noise levels for residential areas under the flight path. While this measure does not directly address take-off noise, it remains a relevant and proven mitigation for approach operations. The feasibility of implementing this adjustment would depend on consultation with aviation authorities and operators, as is standard in the industry.</p> <p>67.6: Establishing effective communication channels with the public is a supplementary mitigation measure aimed at fostering transparency and trust. While it does not directly reduce noise levels, it ensures that affected communities are informed and engaged, which is an essential part of good environmental governance. This measure complements other mitigation strategies by addressing community concerns and providing clarity on airport operations and noise management efforts.</p> <p>67.7: The suggestion for noise-related operating restrictions at night, whether voluntary or government-mandated, reflects a common practice at many airports to reduce noise impacts during sensitive hours. While voluntary restrictions may not offer absolute guarantees, they can still effectively limit nighttime disturbances, particularly when combined with other operational</p>
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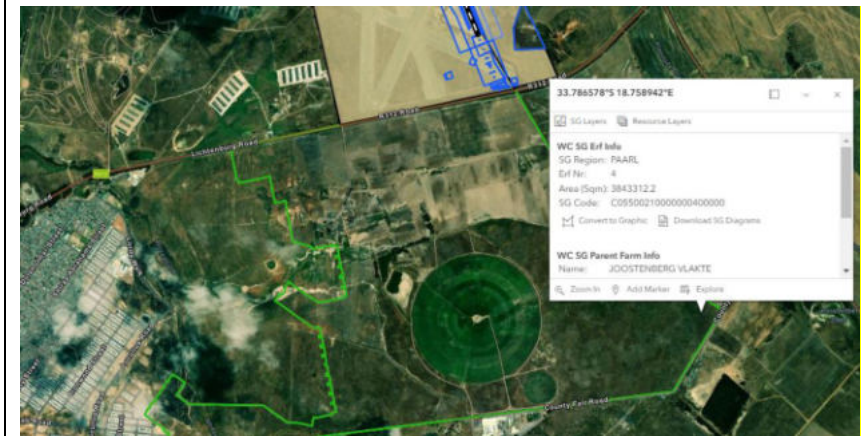
		<p>67.8. Mitigation 8 “the introduction of ‘passive’ mitigation measures, such as noise insulation on existing residential dwellings and noise-sensitive buildings... may be considered”.²⁵ Is the proposed CWA project proposing to pay to improve the sound insulation of the buildings affected by the operational noise levels? Considering the assessment has assumed openable windows for ventilation, any improvements to the buildings would have to include alternative ventilation options (forced/mechanical ventilation), which is likely not feasible for residential and educational facilities.</p> <p>68. The mitigation measures proposed by the NIA in no way clearly or defensibly demonstrates the way or degree to which the noise impacts of the proposed CWA project will be mitigated. The language used in the measures such as “consider” and “may” offers a high degree of flexibility to the Applicant and no degree of confidence that what is proposed will in fact reduce the impacts of noise. As such, none of the proposed mitigations may be relied upon. It must also be noted that the NIA does not consider the primary mitigation measure, i.e. impact avoidance which is to move the runway further from the incompatible land use areas.</p> <p>69. Throughout the NIA the Greenville Garden City development is incorrectly portrayed as though this development has not yet been undertaken, which is</p>	<p>controls. Furthermore, government-imposed restrictions remain a viable option that can be explored as the project progresses.</p> <p>67.8: Passive noise mitigation measures, such as sound insulation for existing effected buildings, are widely recognized as effective strategies for managing operational noise impacts. The critique’s concern regarding feasibility overlooks the practicality of such measures, which have been successfully implemented at other airports globally. While ventilation improvements may be required for certain buildings, these measures can still provide meaningful reductions in noise intrusion for residents and educational facilities. The project’s willingness to fund such improvements, if necessary, reflects a proactive approach to managing impacts.</p> <p>68: CWA & Specialist Response: The comment misrepresents the flexibility in the NIA’s proposed mitigation measures, which is standard in early project planning to ensure adaptability to technical, regulatory, and operational realities. Terms like “consider” and “may” allow for iterative refinement rather than implying a lack of commitment. The suggestion to relocate the runway overlooks technical constraints like wind patterns, safety, and land availability. Mitigation strategies such as incentivizing quieter aircraft, noise restrictions, and sound insulation align with global best practices and provide a practical framework for managing noise impacts. The critique’s assertion that the mitigations are unreliable is unsubstantiated, as the NIA offers proven strategies implemented at airports worldwide, balancing operational needs with environmental and community concerns. Relocating the runway is unnecessary, as the outlined mitigations are sufficient to address predicted impacts effectively.</p> <p>69: CWA & Specialist Response The comment by Garden Cities inaccurately suggests that the Noise Impact Assessment (NIA) overlooks the existing residential areas of Greenville Garden</p>
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factually incorrect. The NIA states that “the Greenville Garden City will be a residential development” (own emphasis), when in fact it is a residential development as it currently stands, with future phases yet to be developed. This position adopted by the applicant is misleading as it creates the impression that the proposed CWA project will not be impacting people’s residential livelihoods at present, but rather at some future point where individuals yet to move into the Greenville development will come in fully expecting to live directly adjacent to a commercial international airport. This is not the case. Whilst the NIA acknowledges the impact on Fisantekraal community, it conveniently ignores the bulk of areas already developed by Garden Cities NPC (RF).

City. While the NIA references Greenville as “a residential development,” this terminology reflects the phased nature of the project, where future parcels, such as Phase/Parcel 4, remain undeveloped. Notably, Phase/Parcel 4 is not an existing residential development; it spans 385 hectares and is currently zoned as agricultural land. At the current rate of development, even if rezoning were to proceed successfully, residential construction in Phase/Parcel 4 would likely only commence in the year 2067, making its inclusion in the assessment speculative at this stage.

The NIA adequately considers impacts on completed phases and existing residential areas while distinguishing future phases that remain undeveloped. The comment’s assertion that the NIA downplays the impacts on current residents is unfounded. The noise contour maps and mitigation strategies address the effects on both the Fisantekraal community and the completed phases of Greenville Garden City. However, the assessment rightly acknowledges that future phases, such as Phase/Parcel 4, do not yet represent residential livelihoods and are therefore treated differently in the evaluation.

By clarifying the phased development status of Greenville Garden City, the NIA provides an accurate and holistic view of the project's impacts. The suggestion that the NIA ignores existing residential areas is incorrect, as these areas are clearly accounted for, but it is also appropriate for the NIA to recognize that future phases like Phase/Parcel 4 are not yet relevant as residential zones.



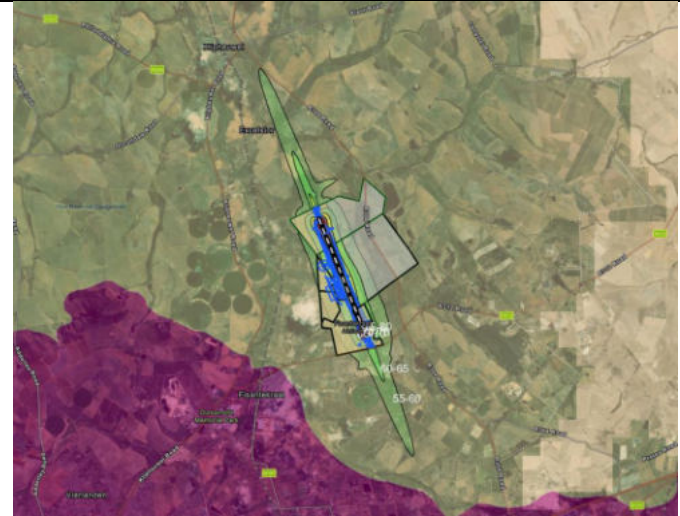
		<p>70. Furthermore, this position held by the Applicant assumes then that the responsibility for mitigating the impacts of the CWA is shared between the CWA developer and our client who is the developer of Greenville Garden City, which is incorrect. This incorrect position concerning the stage at which the Greenville Garden City is currently and the shared responsibility for the mitigation of the impacts of the CWA is clear in the DEIAR where the Applicant states that “the fact that the proposed residential developments of Bella Riva and the Greenville Garden City are in design phase could provide an opportunity to consider and implement appropriate mitigation measures, considering the areas of impact in each development” This statement is meaningless without a detailed exposition and assessment of what specific mitigation measures will be implemented to resolve impacts on all Garden City landholdings in the area. This has not been done. This is not what is envisaged by the entire environmental regulation regime that clearly envisages that the responsibility for the management and mitigation of impacts of a project falls squarely on the shoulders of the Applicant. There is no evidence to show the application of the mitigation hierarchy in this approach. Avoidance as the first option in the mitigation hierarchy has been side-stepped or sacrificed on the altar of achieving the proponent’s threshold of feasibility.</p> <p>71. It is apparent that the proposed airport will have a high negative impact on the existing and future suburban land uses to the south, with no realistic nor meaningful mitigations measures proposed. Based on the findings of the NIA, it is clear that the only feasible mitigation measure, according to the external review by SRL, is to move the runway a distance to the north so that the significant noise impacts are more concentrated on the airport landholding. The NIA therefore does not adequately assess the impact of noise on the Greenville Garden City residential development. In support of our above concerns and in a letter concerning noise contours for planning decisions around the CTIA, Minister Anton Bredell of the Western Cape Ministry of Local Government, Environmental Affairs and Development Planning stated conclusively that “any residential developments on land exposed to noise</p>	<p>70. CWA Response:</p> <p>The comment by Garden Cities misinterprets the intent of the Applicant’s position regarding shared responsibilities for mitigating the impacts of the Cape Winelands Airport (CWA). The Applicant does not shift responsibility for mitigating impacts onto the developers of Greenville Garden City but acknowledges the potential for collaboration to implement complementary mitigation measures where appropriate. The statement in the DEIAR that the design phase of Bella Riva and Greenville Garden City provides an opportunity to consider and implement mitigation measures is a recognition of shared planning opportunities, not an abdication of responsibility. It highlights a proactive approach to explore mutually beneficial solutions.</p> <p>71. CWA & Specialist Response:</p> <p>The claim that the proposed Cape Winelands Airport (CWA) will have high negative impacts on suburban land uses with no meaningful mitigations overlooks the comprehensive strategies outlined in the Noise Impact Assessment (NIA). The NIA includes proven mitigation measures such as noise preferential routes, operational restrictions, and sound insulation, which align with global best practices. The suggestion to relocate the runway further north ignores technical and logistical constraints like wind alignment and safety standards and would shift impacts elsewhere rather than resolve them.</p> <p>Minister Anton Bredell’s statement on noise levels above an LRdn of 65dBA applies to new developments. Existing phases of Greenville Garden City</p>
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		<p>above an LRdn of 65dBA would not be supported by this Department". In this regard see attached hereto Annexure E.</p> <p>AIR QUALITY IMPACTS</p> <p>72. NEMA requires an EAP to assess, among other things, the impact on the environment brought about by the proposed CWA project. This in turn requires the EAP to assess the impact on the sustainability of the existing and proposed / future (approved) developments. Although the impact of emissions associated with the proposed CWA project on the ambient air quality on the proposed Greenville Garden City development has been identified as a concern in the Air Quality Impact Assessment Report dated November 2024, the direct, indirect and cumulative impacts on the existing phases Greenville Garden City development have not been quantified, evaluated or assessed.</p> <p>73. With regard to the proposed CWA project, NEMA requires a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions²⁸ as well as requiring that negative impacts on the environment and on people's environmental rights be anticipated and prevented and where they cannot be altogether prevented, are minimised and remedied²⁹. Due to the gaps and omissions in the assessment, the Report cannot be relied on in its current form.</p> <p>74. It is anticipated that various pollutants will emanate from the construction and, crucially, the operation of the proposed CWA project. The impact of the proposed CWA project on the completed phases Greenville Garden City</p>	<p>completely fall below this threshold, while future phases must adhere to planning regulations that consider noise mitigation. The NIA thoroughly evaluates noise impacts on Greenville, with detailed contour mapping and actionable strategies, making the claim of inadequate assessment unfounded. Relocating the runway is neither practical nor necessary given the comprehensive mitigations proposed.</p> <p>72. CWA & Specialist Response:</p> <p>The Air Quality Impact Assessment comprehensively evaluates direct, indirect, and cumulative impacts of emissions from the proposed Cape Winelands Airport (CWA) project, considering sensitive receptors in surrounding areas, including Greenville Garden City. The report uses advanced modelling tools and benchmarks emissions against national ambient air quality standards, ensuring compliance. Mitigation strategies address both construction and operational emissions, reducing potential impacts to sustainable levels. The claim that direct and cumulative impacts were not quantified or assessed is incorrect, as the assessment provides detailed dispersion models and risk evaluations based on current and proposed scenarios.</p> <p>73: The Environmental Impact Assessment for the CWA project adheres to NEMA's requirements for a cautious and risk-averse approach, ensuring the environmental and health risks are thoroughly assessed. The Air Quality Impact Assessment explicitly quantifies pollutants and outlines mitigation measures aligned with regulatory standards. The claim of "gaps and omissions" lacks basis, as the report evaluates worst-case scenarios and incorporates ongoing monitoring plans to minimize impacts. The methodologies applied are consistent with international best practices, fulfilling NEMA's mandate to balance development with environmental preservation.</p> <p>74: CWA & Specialist Response:</p>
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		<p>development as well as the future phases of the development (directly and cumulatively) is not quantified, evaluated or assessed. This is a fatal flaw.</p> <p>75. This means that the failure to assess this impact as part of the impact assessment process is in direct opposition to the various NEMA Principles stated above. More specifically, the failure to assess an identified impact directly contravenes NEMA especially when considering the lack of specialist studies undertaken during the impact assessment process to determine ambient air quality impacts on the existing Greenville Garden City development, associated with the proposed CWA project.</p>	<p>The Air Quality Impact Assessment addresses anticipated pollutants from the CWA project during both construction and operation phases, using detailed modelling to evaluate their dispersion and cumulative impacts on nearby areas, including Greenville Garden City. The report demonstrates compliance with national air quality standards and proposes targeted mitigation measures to manage emissions effectively. The assertion that impacts on completed and future Greenville phases were not assessed is inaccurate, as the study includes comprehensive modelling for sensitive receptors under various scenarios.</p> <p>75. CWA & Specialist Response:</p> <p>The claim that the impact assessment process contravenes NEMA due to the absence of a specific ambient air quality assessment is not substantiated. The Noise Impact Assessment (NIA) and other specialist studies conducted as part of the broader Environmental Impact Assessment (EIA) process were scoped to address identified priority impacts, following rigorous baseline assessments and stakeholder consultation.</p> <p>Air quality impacts related to aviation activities are generally considered in the broader EIA process rather than solely within the NIA. If such impacts were deemed significant during scoping, they would be addressed in a dedicated air quality study. The absence of such a study likely reflects that air quality was not identified as a critical issue based on preliminary assessments or stakeholder input.</p> <p>Furthermore, the EIA process is iterative and adaptive, allowing for additional studies if new evidence or stakeholder concerns warrant further investigation. This approach is fully aligned with NEMA principles, which emphasize sustainable development and proportionality in impact assessment.</p> <p>In conclusion, the EIA process, including the NIA, is compliant with NEMA principles. Any perceived gaps can be addressed through continued monitoring, stakeholder engagement, and adaptive management, ensuring all potential impacts are responsibly managed.</p>
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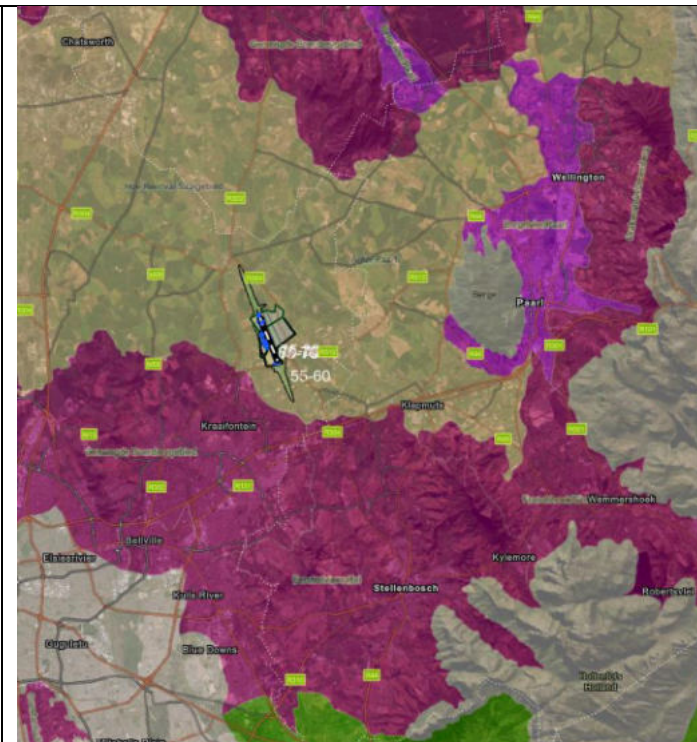
		<p>76. Ambient air quality impacts are of serious concern to stakeholders in the area, with the various existing residential developments and proposed / future residential developments being a predominant factor in the broader project area. Against that backdrop, the compatibility and potential impacts of the proposed CWA project on surrounding land uses in the area have not been assessed adequately.</p> <p>77. Specifically, the Air Quality Impact Assessment Report fails to:</p>	<p>76. CWA & Specialist Response:</p> <p>The assertion that ambient air quality impacts and land-use compatibility have not been adequately assessed does not consider the structured approach of the Environmental Impact Assessment (EIA) process. The EIA is designed to evaluate all significant environmental and socio-economic impacts, including potential air quality concerns, as part of a comprehensive assessment framework.</p> <p>Stakeholder concerns regarding ambient air quality and compatibility with surrounding land uses are acknowledged. However, these aspects are typically addressed within the appropriate specialist studies where significant impacts are identified during the scoping phase. The absence of a specific air quality study or further land-use assessments likely reflects the findings of the initial scoping process, which determines the priority focus areas for detailed analysis.</p> <p>Moreover, the compatibility of the proposed project with surrounding land uses is a key consideration of the EIA process, ensuring alignment with spatial planning principles and NEMA's goal of sustainable development. Any outstanding concerns can be addressed through adaptive management, monitoring, and stakeholder engagement during project implementation.</p> <p>In conclusion, the EIA process is robust and compliant with NEMA principles, and any further assessments required can be incorporated to ensure all concerns are adequately addressed in line with the regulatory framework.</p> <p>77. CWA & Specialist Response:</p> <p>The AQIA thoroughly evaluates air quality impacts on Greenville Garden City and other sensitive receptors at varying distances from the CWA. It incorporates emissions from airport-related activities and provides mitigation strategies to address current and future conditions. The critique that cumulative and receptor-specific impacts were not assessed is unsupported, as the report demonstrates compliance with regulatory standards and ensures a comprehensive analysis of air quality impacts.</p>
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		<p>77.1. Identify and assess the cumulative vehicle emissions associated with the future (approved) phases of the Greenville Garden City development. In this regard, the Air Quality Impact Assessment Report erroneously records that the “CWA project site ... is surrounded by farmlands. The main land uses in the area include agriculture and poultry farming”.³⁰</p>	<p>The claim that the Air Quality Impact Assessment (AQIA) fails to adequately identify and assess cumulative emissions and impacts on Greenville Garden City and other receptors misrepresents the findings of the report. The AQIA considers multiple sensitive receptors, including Greenville Garden City, and models emissions from both construction and operational phases of the Cape Winelands Airport (CWA). Specific receptor locations and distances provide further clarity:</p> <p>77.1: The critique that cumulative vehicle emissions from future phases of Greenville Garden City were not assessed is inaccurate. The AQIA identifies sensitive receptors, including those in Greenville Garden City located between 1.8 km and 3.2 km south of the CWA, and evaluates air quality impacts through dispersion modelling. Emissions from unrelated future developments, such as the approved phases of Greenville, fall outside the AQIA’s scope and would be addressed under separate environmental approvals. The report’s reference to surrounding land uses as predominantly agricultural reflects the current baseline conditions near the CWA site.</p> <p>Areas in pale green are mapped as relatively homogenous farming areas with common agricultural practices and climatic conditions.</p>
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77.2. Identify and assess the impacts of the proposed CWA project on the Greenville Garden City development as a sensitive receptor in immediate proximity of the proposed CWA project. This is evident from the following:

77.2.1. “the sensitivity in the immediate vicinity of the site is considered low, since there are no existing residential areas bordering the CWA airport site. The closest community is that of Fisantekraal, which is situated more than 1 000m away, towards the south-west” .31



77.2: CWA and specialist response: The AQIA acknowledges that Greenville Garden City and other receptors are sensitive areas, with specific attention to receptor locations at 1.8 km, 2.0 km, 2.7 km, and 3.2 km south of the CWA. The statement regarding “low sensitivity” refers to current conditions where the closest established residential areas, such as Fisantekraal, are located more than 3.0 km southwest of the airport site. For future developments, the AQIA assumes buffer zones will be implemented to minimize potential impacts, consistent with international and local planning best practices.

77.2.1 & 77.2.2:

77.2.2. "... in the near future two residential areas are planned to be developed immediately south and towards the west of the airport. Once these communities are established, the sensitivity of the area would be considered moderate, assuming appropriate buffer zones will be established, primarily due to noise impact concerns".32

77.3. Identify, evaluate and assess emission mitigation measures required during operational phases associated with the proposed CWA project. In this regard, the Air Quality Impact Assessment Report notes that "...the identification of the most suitable and cost-effective mitigation measures, together with a realistic time schedule for their application, can only be a result of consultations between various stakeholders associated with all the airport operations. As such, a mitigation version of the impact ratings was not produced for the operational impact ratings ...".33

77.4. Identify, evaluate and assess compatible land uses associated with the proposed CWA project. In this regard, the Air Quality Impact Assessment Report records that potential mitigation measures include the encouragement of airport -compatible land-use planning and the utilisation of aircraft-serving equipment with cleaner technology.34 This is speculative and devoid of any meaningful relevance.

The statement about low sensitivity accurately describes current conditions, as all existing residential developments are located way beyond 1 km from the site. However, the AQIA accounts for moderate sensitivity as future phases of Greenville Garden City are developed. For example, receptor R16 at 3.2 km south, R17 at 2.7 km south, R18 at 1.9 km south, and R19 at 1.8 km south were explicitly considered in the modelling. The report does not dismiss impacts but anticipates appropriate mitigation measures for these receptors to address air quality concerns.

The statement about "in the near future" regarding the development of Greenville Garden City is misleading. Based on historical data, Greenville has delivered an average of 200 houses per year since 2012 when their rights were approved. Given the scale of future phases, particularly those located closer to the CWA, it would commence construction in 2067 for Phase/Parcel 4, however the rights on Phase/Parcel 4 have lapsed.

77.3: CWA and specialist response: The AQIA explicitly acknowledges that the identification of the most suitable and cost-effective mitigation measures for operational phases requires input and collaboration among various stakeholders. This approach is not a failure but a recognition of the complexity of airport operations, where effective mitigation strategies depend on ongoing consultations with regulatory authorities, airport operators, airlines, and surrounding communities. The absence of a "mitigation version" of impact ratings reflects the report's transparency in presenting the current state of planning and its commitment to refining these strategies through stakeholder engagement. This iterative approach ensures that mitigation measures are tailored, practical, and implementable in the operational context.

77.4: CWA and specialist response: The AQIA's recommendation to encourage airport-compatible land-use planning and the use of cleaner technologies is consistent with international best practices in airport development. The critique's dismissal of these measures as speculative ignores their proven relevance in mitigating air quality impacts. Compatible land-use planning is a widely accepted mitigation strategy, ensuring that future developments near

		<p>78. In light of the absence of materially relevant information, stakeholders are unable to engage meaningfully with the substance of the project-related impacts on surrounding communities, residents and land uses and in light of this, it is not possible to gauge or ascertain whether the proposed CWA project is indeed compatible with sustainable development in terms of section 2(4) of NEMA. This oversight is concerning to Garden Cities which – as with many other members of the community in the area – are increasingly concerned about land use compatibility in the area and the absence of impact assessments pertaining to the surrounding land uses for this proposed CWA project. This is particularly problematic given the fact that the Garden Cities has already invested a substantial amount of funds to ensure the viability and sustainability of the Greenville Garden City development as a whole. The impact on surrounding land-uses is therefore unresolved and unaddressed. In the circumstances, the assessment fails to adopt and implement a risk adverse and cautious approach, based on the limits to current knowledge and that key information is unknown and the issue is in need of further investigation.</p>	<p>airports align with environmental and operational needs. Similarly, promoting cleaner technologies for ground-support equipment and aircraft aligns with global trends in reducing aviation-related emissions. These measures, while forward-looking, provide a meaningful framework for addressing long-term air quality impacts.</p> <p>78. The EAP notes the IAP concern. The draft EIAR includes extensive information on the baseline environment, Biophysical, socio-economic, Heritage, Aviation, Climate Change impacts based on the assessment of Alternatives, and provides mitigation measures taken up in the EMPr. Meaningful engagement is encouraged through the Public participation process and includes stakeholders from all sectors, including adjacent landowners.</p> <p>CWA & Specialist Response:</p> <p>The claim that the absence of information in the assessment prevents stakeholders from meaningfully engaging with the proposed Cape Winelands Airport (CWA) project and its compatibility with sustainable development under section 2(4) of NEMA is unfounded. The Environmental Impact Assessment (EIA), including the Air Quality Impact Assessment (AQIA), Noise Impact Assessment, and other studies, provides extensive data on the project’s potential impacts on surrounding communities, land uses, and the environment. These assessments are based on detailed modelling, established methodologies, and recognized regulatory frameworks, ensuring stakeholders have a robust foundation for engagement.</p> <p>The assessment addresses land use compatibility by identifying surrounding sensitive receptors, including Greenville Garden City, and proposing mitigation measures to minimize impacts. The AQIA and Noise Impact Assessment consider the current and future phases of Greenville and propose strategies such as airport-compatible land-use planning, operational restrictions, and buffer zones. The critique overlooks these measures and fails to acknowledge that planning for land-use compatibility is inherently a collaborative process involving input from multiple stakeholders, including Garden Cities.</p>
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		<p>79. The absence of a systematic approach has resulted in inconsistencies throughout the Air Quality Impact Assessment Report. For example:</p> <p>79.1. In relation to the composite air pollution emissions from all the onsite operational activities in respect of current runways operating at capacity, Table 4-9 on page 4-2 of the Air Quality Impact Assessment Report records as follows:</p>	<p>The EIA complies with NEMA's principles by adopting a risk-averse approach. It transparently identifies potential uncertainties and proposes adaptive management strategies to address them. For example, the AQIA explicitly outlines the need for ongoing consultations with stakeholders to refine mitigation measures and adapt to evolving conditions. This is consistent with NEMA's requirement to anticipate, prevent, and minimize negative impacts while balancing development needs with environmental sustainability.</p> <p>The concern raised by Garden Cities regarding its investment in Greenville is acknowledged, but the EIA has adequately addressed the potential impacts on the development. Noise and air quality assessments explicitly consider receptor locations within Greenville, providing impact evaluations and mitigation recommendations. Claims that these impacts are "unresolved and unaddressed" ignore the detailed findings of the assessments and their proposed mitigation strategies.</p> <p>The EIA provides a comprehensive assessment of the CWA's potential impacts and proposes robust mitigation measures to address concerns about surrounding land uses and community well-being. The critique's claim of insufficient information is unsubstantiated, as the assessments provide stakeholders with the necessary data to engage meaningfully. The proposed project aligns with NEMA's principles of sustainable development, adopting a cautious and transparent approach to address uncertainties while balancing environmental and developmental considerations.</p> <p>79.1- 79.3</p> <p>CWA Response: The assertion that emissions of pollutants such as VOCs, SOx, NOx, CO₂, and CO cannot remain constant as air traffic movements (ATMs) increase fails to account for the detailed modelling and methodology presented in the Air Quality Impact Assessment (AQIA). The AQIA explains that emissions are calculated using advanced modelling tools (e.g., AEDT) and accounts for operational profiles at various scenarios, including the new runway at its full operational capacity.</p> <p>As detailed in the AQIA (pages 4-2 and 4-3), emissions are assessed comprehensively across multiple operational categories, including aircraft,</p>
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Category	Emissions (tonne/yr)							
	CO ₂	CO	THC	VOC	NO _x	SO _x	PM ₁₀	PM _{2.5}
Aircraft	37,518	85.1	13.3	15.1	249.4	69.7	3.2	3.2
GSE	-	128.5	-	4.4	13.9	0.4	0.5	0.5
APUs	-	9.8	0.7	0.8	7.1	1.1	1.2	1.2
Parking Facilities	-	3.9	-	0.5	0.3	0.002	0.009	0.005
Roadways (airport)	-	19.4	-	0.9	0.84	0.04	0.16	0.08
Stationary Sources	-	-	0.6	0.7	-	-	-	-
Sub-Total	37,518	246.8	14.6	22.3	271.6	71.2	5.0	4.9
Roadways (general)	-	279.4	-	8.4	8.7	0.3	2.0	0.9
Grand Total	37,518	526	15	31	280	71	7	6

79.2. In relation to the composite air pollution emissions from all the onsite operational activities in respect of new runway operating at full capacity, Table 4-11 on page 4-3 of the Air Quality Impact Assessment Report records as follows:

Category	Emissions (tonne/yr)							
	CO ₂	CO	THC	VOC	NO _x	SO _x	PM ₁₀	PM _{2.5}
Aircraft	37,518	85.1	13.3	15.1	249.4	69.7	3.2	3.2
GSE	-	128.5	-	4.4	13.9	0.4	0.5	0.5
APUs	-	9.8	0.7	0.8	7.1	1.1	1.2	1.2
Parking Facilities	-	3.9	-	0.5	0.3	0.002	0.009	0.005
Roadways (airport)	-	19.4	-	0.9	0.84	0.04	0.16	0.08
Stationary Sources	-	-	0.6	0.7	-	-	-	-
Sub-Total	37,518	246.8	14.6	22.3	271.6	71.2	5.0	4.9
Roadways (general)	-	279.4	-	8.4	8.7	0.3	2.0	0.9
Grand Total	37,518	526	15	31	280	71	7	6

79.3. It is inconceivable that emissions associated with identified pollutants such as VOCs, SO_x, NO_x, CO₂ and CO will remain the same given the increase in CWA forecast air traffic movements as evident below:35

ground support equipment (GSE), auxiliary power units (APUs), and roadways. The AQIA highlights the primary contributors to emissions for each pollutant, such as aircraft being the dominant source of NO_x (88%) and SO_x (97%), while roadways significantly contribute to CO and particulate matter. This breakdown demonstrates a rigorous and transparent assessment of emissions.

The AQIA also notes that as the operational profile evolves (e.g., during the early operational years of the new runway), emissions will increase incrementally but will stabilize due to operational efficiencies and the adoption of cleaner technologies. For example, Table 4-11 in the AQIA shows that emissions at full capacity reflect current worst-case scenarios, not a simple linear increase based on traffic projections. This approach accounts for advances in fuel efficiency, aircraft engine improvements, and potential regulatory measures to curb emissions growth.

The AQIA also anticipates mitigation measures that will further offset emissions growth, including the use of electric or hybrid ground support equipment and improved traffic management systems. These factors explain why emissions from specific pollutants may not rise proportionally with air traffic growth.

The AQIA provides a detailed and realistic projection of emissions across various operational scenarios. It accounts for increased ATMs while incorporating operational efficiencies and technological advancements to mitigate emissions.

Table 4-11 was erroneously a repeat of 4-9. Table 4-11 was replaced to correctly reflect the Scenario 3 emissions.

Air Traffic Movements	Year				
	2029	2032	2038	2044	2050
ONE-WAY (Arrivals or Departures)					
Domestic	3 200	5 050	7 450	9 475	11 150
International	2 375	3 850	4 925	6 000	6 900
Regional International	-	-	-	-	-
Total	5 575	8 900	12 375	15 475	18 050
Air Traffic Movements	Year				
TWO-WAY (Arrivals and Departures)	2029	2032	2038	2044	2050
Domestic	6 400	10 100	14 900	18 950	22 300
International	4 750	7 700	9 850	12 000	13 800
Regional International	-	-	-	-	-
Total	11 150	17 800	24 750	30 950	36 100

79.4. The Air Quality Impact Assessment Report records the maximum 1-hr concentration isopleths of CO resulting from the airport operations for the existing runways at full capacity as well as for the new runways at full capacity. In this regard, it is expressly stated that the 1-hr CO concentrations were well below the guideline of 30 000ug/m³. However, when regard is had to Figures 5-3 and Figure 5-10, it is evident that different units / scales for measuring CO concentrations were utilised, which constitutes a potential misrepresentation in light of the following:

- 79.4.1. It is trite that emissions should be reported using the same units and scales for both present and future scenarios to allow for a direct and clear comparison.
- 79.4.2. Any deviations in units and scales must be explicitly justified and accompanied by proper context to avoid misinterpretation. This information has not been made available.
- 79.4.3. Further, if a change in units and scales is necessary, this must be clearly documented in the Air Quality Impact Assessment Report due to associated implications on the results and conclusions. Again, this was not done.
- 79.4.4. Given the absence of explanations regarding the rationale for the difference in scale and units, the manner in which the information is presented in the Air Quality Impact Assessment is disingenuous as it deliberately (or, at best, unintentionally) downplays the impacts

79.4 CWA & Specialist Response:

The Air Quality Impact Assessment Report (AQIAR) explicitly outlines its methodology, assumptions, and modelling systems used for evaluating air quality impacts under current and future scenarios. The allegations of inconsistent units or scales between Figures 5-3 and 5-10 are unfounded when contextualized within the report's clear segmentation of scenarios, pollutant types, and receptor contexts.

The AQIAR applies the same modelling framework, namely the Aviation Environmental Design Tool (AEDT), across all operational scenarios. This ensures uniformity in the emission quantifications and subsequent atmospheric dispersion simulations. Both Figures 5-3 and 5-10 pertain to distinct operational conditions but adhere to the same standard for pollutant concentration guidelines, including the 1-hour carbon monoxide (CO) threshold of 30,000 µg/m³.

The report consistently provides detailed emission scales and receptor sensitivity evaluations. While the critique alleges missing justifications for unit differences, it overlooks the clear delineation in the report about why varying contexts might necessitate distinct visual representation formats (e.g., to emphasize local vs. regional impacts). The different scale was selected merely for illustration purposes, in order to provide the extend of the impact for the specific levels. The fact that in both cases these scales are well below the limit

associated with the proposed CWA project, which undermines the credibility of the assessment and raises concerns regarding potential bias and/or inaccuracies in the analysis undertaken by the specialist in the circumstances.

80. In light of the uncertainty, gaps and omissions regarding air emission impacts of the proposed CWA project as detailed above, the direct impact of the proposed CWA project and the cumulative impacts of the proposed CWA project on the receiving environment has not been fully assessed in terms of the requirements of the EIA Regulations.

of 30,000 µg/m³ is clearly indicated and provides an unequivocal indication that impacts are very low.

The report explicitly demonstrates that 1-hour maximum CO concentrations remain well below the guideline limit under all operational scenarios, reinforcing compliance with South African Ambient Air Quality Standards (NAAQS). This consistency directly counters any claims of disingenuous data presentation.

The AQIAR explicitly states its assumptions and limitations, ensuring stakeholders have a clear understanding of the modelling constraints. Criticisms of bias or misrepresentation are speculative and lack substantive grounding within the report's text.

Figures 5-3 and 5-10 are used to analyse distinct conditions (current vs. future full capacity scenarios), with each figure contributing to the broader understanding of operational impacts. The core finding, as highlighted, is that even under full-capacity future operations, pollutant levels remain within permissible thresholds.

The critique of alleged unit and scale inconsistencies fails to account for the transparent methodology and thorough documentation provided in the AQIAR. The report's findings demonstrate compliance with air quality standards and present emissions data without misrepresentation. The accusations of bias or inaccuracies are speculative and unsupported by the evidence within the report.

80: CWA & Specialist Response:

The claim that air emission impacts of the proposed Cape Winelands Airport (CWA) project have not been fully assessed is unfounded. The Air Quality Impact Assessment (AQIA) comprehensively evaluates direct and cumulative emissions, including pollutants such as NO_x, SO_x, CO, and VOCs, using detailed dispersion modelling aligned with South African Ambient Air Quality Standards (NAAQS). The assessment considers multiple scenarios, including construction and full operational capacity, and addresses sensitive receptors like Greenville Garden City. Cumulative impacts from aircraft, ground support equipment,

		<p>81. In summary, the Air Quality Impact Assessment Report is not adequate for the following reasons:</p> <p>81.1. The failure to assess, predict and evaluate the impacts of the proposed CWA project on the Greenville Garden Cities development is contrary to the provisions of NEMA. Given the concerns raised historically be Garden Cities, the critical importance of the Greenville Garden Cities development to the broader strategic concern and imperative of providing much needed housing in the metropolitan area, this is a serious shortcoming in the assessment.</p> <p>81.2. Key stakeholder concerns are unresolved. Garden Cities consistently raised the concern that the proposed CWA project may jeopardise the sustainability of the Greenville Garden City development and its core residential business model for the Garden Cities development and thereby threaten the substantial benefits that these future development will provide to the abutting Fisantekraal community and the broader public good in Cape Town and the fact that the various phases of the Greenville Garden City development will contribute to satisfying the need and demand for housing, commercial and business opportunities, as evidenced in the tables in the socio-economic section above.</p>	<p>and road traffic are thoroughly analysed, with mitigation measures proposed to minimize emissions and ensure compliance with air quality standards.</p> <p>The AQIA fully meets the requirements of the EIA Regulations by providing a thorough analysis and proposing robust mitigation strategies. Claims of insufficient assessment are baseless, as the report ensures compliance, environmental protection, and public health safeguards through its detailed findings and precautionary approach.</p> <p>81. CWA and specialist response:</p> <p>81.1: The AQIAR explicitly assesses air quality impacts on sensitive receptors, including Greenville Garden City, using robust modelling tools aligned with the National Environmental Management Act (NEMA). The evaluation considers both direct and cumulative impacts, addressing pollutant dispersion and proposing mitigation measures to manage emissions. Additionally, it is important to note that Phase/Parcel 4 of the Greenville Garden City development has lapsed and remains zoned as agricultural land. This lapse underscores that potential impacts on this parcel are speculative, as any future development would require rezoning and additional environmental approvals. The AQIAR appropriately acknowledges this status and focuses its assessment on existing receptors and realistic future scenarios. The characterization of this as a "failure" disregards the report's detailed findings and mitigation proposals, which align with regulatory requirements and best practices.</p> <p>81.2: Concerns raised by Garden Cities about the sustainability of Greenville Garden City are acknowledged in the EIA. The AQIAR and related assessments emphasize compliance with air quality standards, proposing actionable strategies to minimize impacts on Greenville and surrounding communities. Additionally, claims that the CWA project may jeopardize Greenville's future development are speculative and not supported by the AQIAR's data, which demonstrates emissions will remain within permissible thresholds, ensuring environmental and public health protection.</p>
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		<p>81.3. The treatment of mitigation measures in the EIA process is deficient and fails to satisfy the legal requirements for the investigation and evaluation of mitigation measures to the activity during the EIA process.</p> <p>81.4. The evaluation and consideration of air emission impacts does not satisfy the EIA best practice, nor does it meet the peremptory requirements prescribed by NEMA or the EIA Regulations in this regard. The indirect, cumulative and consequential impacts on the Greenville Garden City development have not been quantified.</p> <p>81.5. The proposed CWA project will fundamentally and adversely affect the sustainability of the future phases (4-7) of the Greenville Garden City development. 82.</p>	<p>81.3: The critique of mitigation measures as deficient overlooks the iterative and stakeholder-driven approach detailed in the AQIAR. Mitigation strategies include promoting cleaner technologies, implementing operational restrictions, and encouraging compatible land-use planning. These measures are consistent with EIA best practices and are designed to evolve through collaboration with stakeholders, ensuring alignment with regulatory requirements.</p> <p>81.4: The AQIAR thoroughly evaluates direct, cumulative, and consequential impacts, including emissions from aircraft, ground support equipment, and road traffic. The methodology adheres to NEMA principles and EIA regulations, ensuring comprehensive coverage of all relevant scenarios. Claims that cumulative impacts on Greenville Garden City have not been quantified are incorrect, as the report clearly outlines modelled emissions and their dispersion across the region.</p> <p>81.5: Garden Cities’ claim that the proposed CWA project will “fundamentally and adversely affect the sustainability of the future phases (4-7) of the Greenville Garden City development” implicitly acknowledges that the CWA project has no impact on Phases/Parcels 1-3 of the development. This is significant, as these completed phases represent the existing, tangible aspects of Greenville Garden City.</p> <p>Regarding Phase/Parcel 4, the rights for this phase have lapsed, and the land remains zoned as agricultural. Any future development on this parcel would require rezoning and a new environmental approval process. As such, claims of adverse effects on Phase/Parcel 4 are speculative and unfounded.</p> <p>For Phases 5-7, no documentation, detailed design, or even conceptual design has been presented or referenced by Garden Cities. These phases appear to be speculative at this stage, and no evidence has been provided to suggest they have been formally planned, let alone approved. Without detailed designs or established rights, it is not possible to claim that the CWA project will adversely affect these hypothetical future phases.</p> <p>The assertion that the CWA project will negatively impact future phases of Greenville Garden City is speculative and lacks substantiation. Phases 1-3 are unaffected, Phase/Parcel 4 lacks current development rights, and Phases 5-7 remain unplanned and undocumented. The CWA project’s assessments</p>
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		<p>82. In conclusion, the gaps and omissions in the assessment are extensive and constitute a material flaw in the EIA process. Due to the material omissions, the Air Quality Impact Assessment Report fails to comply with the minimum legal requirements to ensure that specialist reports contain, among others, a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change.</p> <p>PUBLIC PARTICIPATION PROCESS</p> <p>83. Despite having raised our concerns with the EAP during November 2024 regarding the unreasonably short public comment period of 30 days, a limited extension was granted by the EAP (and the deadline for comments extended to 13 January 2025).</p>	<p>appropriately focus on existing and realistic future scenarios, adhering to regulatory requirements and addressing tangible impacts.</p> <p>82.</p> <p>CWA and specialist Response: The claim that the Air Quality Impact Assessment Report (AQIAR) is flawed and non-compliant is baseless. The AQIAR fully complies with NEMA and EIA Regulations, providing a detailed evaluation of existing impacts, cumulative effects, and acceptable levels of change. It uses advanced modelling to quantify emissions, assesses cumulative impacts from construction and operations, and benchmarks results against South African Ambient Air Quality Standards (NAAQS).</p> <p>The report transparently defines thresholds for acceptable change, proposes robust mitigation measures like cleaner technologies, and ensures emissions remain within regulatory limits. Allegations of gaps and omissions ignore the comprehensive and legally compliant assessment provided in the AQIAR.</p> <p>The AQIAR meets all legal requirements and offers a robust, transparent analysis of air quality impacts. Claims of non-compliance are unfounded and fail to acknowledge the thoroughness of the assessment.</p> <p>EAP response: The baseline information was provided in the Scoping report. The specialist report complies with the requirements of NEMA Appendix 6 in terms of content and layout.</p> <p>83. PHS response: The EAP granted an additional 9-day extension to the IAP.</p> <p>No response re the inadequacy of the extension period was received from the IAP after the EAP sent the extension communication.</p> <p>CWA Response: It is worth highlighting that CWA has exceeded its legislative obligations throughout the public participation process. Not only was a public comment period of 30 days provided as per regulatory requirements, but CWA also extended this deadline from 13 December 2024 to 13 January 2025 to accommodate stakeholders and ensure adequate time for thorough engagement.</p>
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		<p>84. As evidenced by these comments on the DEIAR there is a superficiality to the environmental assessment process that is exacerbated by the slavish adherence to process (rather than the substance of the assessment), which has culminated in a public participation process that is disproportionate to the nature of the proposed project and the magnitude and extent of potential environmental, social and economic impacts. Garden Cities thus remains deeply sceptical of the process and the overwhelming and inescapable perception is that the public participation process has been neither adequate nor meaningful. I&APs are at distinct and unfair (prejudicial) disadvantage.</p>	<p>Furthermore, CWA conducted a pre-application draft Scoping Report in November 2023, ensuring that Interested and Affected Parties (I&APs) had an early opportunity to engage with the project before the formal environmental assessment process commenced. This additional, proactive step underscores CWA's commitment to fostering meaningful public participation.</p> <p>In addition, CWA plans to hold another public consultation in February 2025, to allow for final comments prior to closing the process. This will provide yet another opportunity for stakeholders to review and contribute to the decision-making process.</p> <p>CWA's efforts go well beyond what is legislatively required, reflecting a genuine commitment to inclusive engagement, transparency, and the incorporation of stakeholder feedback into the development process. This extended and multi-phase approach exemplifies best practices in public participation and demonstrates CWA's determination to address stakeholder concerns comprehensively.</p> <p>84. The EAP takes note of the comment.</p> <p>The public participation process adheres not only to the requirements of NEMA, but also includes additional steps and items to enable meaningful engagement with IAPs. As stated in the draft EIAR, additional PPP is planned for early 2025, during which time all registered IAPs will be able to review and comment on the amended draft EIAR before final submission to DEA&DP.</p> <p>CWA Response: We respectfully disagree with the claim that the environmental assessment process lacks substance or that public participation has been inadequate or disproportionate.</p> <p>The process has included comprehensive specialist studies addressing environmental, social, and economic impacts. These have been conducted by qualified professionals and shared transparently to ensure meaningful engagement. CWA has also gone beyond legal requirements by conducting a pre-application draft scoping report in November 2023, extending the DEIAR comment period by an additional month to 13 January 2025, and scheduling</p>
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		<p>85. I&APS were initially provided a 30-day period to comment on the DEIAR which comment period was scheduled to close on 13 December 2024. However, given the time of year and the sheer volume of information and documentation for the project (see below) this meant that it was grossly unreasonable and inadequate to provide the bare minimum of 30 days to comment on the DEIAR and associated specialist reports. The volume of information made available to I&APs is in excess of a staggering 6000 pages. The time of year chosen for the public participation process (December is notoriously difficult in terms of time and capacity available to I&APs to comment on reports of this nature). The slavish adherence to statutory timeframes, the time of year, and the volume of documentation made available have the combined effect of resulting in public participation fatigue and further undermines I&APs rights.</p>	<p>another public consultation in February 2025 before closing for final comments.</p> <p>Efforts to ensure accessibility and inclusivity include multilingual notices, online and physical report availability, and various methods for submitting comments, ensuring meaningful participation for all stakeholders. Given the project's scale and complexity, the process appropriately reflects its potential impacts.</p> <p>85. The EAP takes note of the comment. Please note the public participation period ran from 13 November up to and inclusive of 13 December and not only in December as stated by the IAP. As stated in the draft EIAR, additional PPP is planned for early 2025, during which time all registered IAPs will be able to review and comment on the amended draft EIAR.</p> <p>CWA Response: We acknowledge the concerns about the volume of documentation provided during the DEIAR public participation process. However, it is important to clarify that the "6000 pages" referenced represent an iterative process rather than a one-time information dump. These reports reflect a detailed, phased approach that has incorporated stakeholder feedback and progressively informed the assessment, ensuring a thorough and meaningful evaluation of the project's potential impacts.</p> <p>It is also notable that Garden Cities, in prior comments, expressed concern about insufficient research to justify the project, yet now cites the extensive documentation as a burden. This contradiction underscores the comprehensiveness of the studies undertaken, which are designed to address all aspects of environmental, social, and economic impacts with the utmost rigor.</p> <p>To ensure accessibility and transparency, these reports were made available in multiple formats (online, hard copies, and USBs) with multilingual notices and extended public participation periods. While the volume reflects the complexity of the project, CWA has proactively mitigated concerns by extending the original 30-day comment period to 13 January 2025 and scheduling another public consultation in February 2025 to provide I&APs with further opportunities for engagement.</p>
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		<p>86. Despite our request that Garden Cities be provided with a reasonable and adequate commenting period required to enable meaningful engagement in the project, the EAP simply granted a limited extension to 13 January 2025. As indicated, I&APs are expected to digest and comment on a combined volume of approx. 6000 pages within a minimum statutory commenting period of 30 days. The notional additional 30 calendar days granted by the EAP is unreasonable and has done little to resolve our concern about the inappropriate timeframe. It is trite that the period between 15 December 2024 and 5 January 2025 shall be excluded from anytime statutory timeframe for the purposes of the EIA Regulations. Having due regard to this statutory “dead period” the extension granted equates to a meagre 6 Business Days. Refusal of this is unethical, unreasonable and grossly unfair. Even those I&APs with specialist assistance and access to resources are not able to deal meaningfully with the volume of information and EAP’s responses to issues raised in that limited timeframe.</p>	<p>The process has been carefully structured to allow for meaningful participation and balanced stakeholder engagement, demonstrating a commitment to inclusivity and transparency throughout this ongoing assessment.</p> <p>86. This comment has been addressed above.</p> <p>Please note: The EAP granted an additional 9-day extension to the IAP and not 6 as stated. The NEMA timeframes refer to calendar days and not business days when stipulating timeframes.</p> <p>The EAP acknowledges the volume of information that forms part of the EIA process. It is a result of extensive research by specialists, extensive design by technical specialists, and Comments and Responses reports resulting from two previous rounds of PPP. Further documents such as the EMPr are NEMA requirements and together with the draft EIAR have to comply to content requirements.</p> <p>Some of the documents have been part of the PPP before during the Scoping Phase and are not new reports (such as the WULA technical report, Bulk Engineering, Electrical Engineering, Spatial Policy and Land Use rights; Hydropedological Assessment; Architectural Guidelines; Outdoor Advertising Guideline; Fuel report; CONOPS; Annex 14 OLS; Archaeological report; EAP CV; Screening and SSV). These reports are updated as needed during the EIA process with amendments underlined for ease of reference for IAPs. The "6000 pages of documentation" referenced represents an iterative process, developed over time with continuous input from stakeholders. It is not a sudden or overwhelming "data dump" but a comprehensive compilation of detailed studies designed to address the project’s complexity. Stakeholders, including Garden Cities, have been engaged throughout this process and have had multiple opportunities to provide input on the various phases of the documentation.</p> <p>86.-89 CWA Response: We respectfully refute the claims regarding the adequacy of the public participation process and timeframes associated with the DEIAR review.</p>
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			<p>While the statutory requirement for public comment mandates a minimum 30-day period, CWA extended the deadline to 13 January 2025, providing additional time for stakeholders to engage. While it is acknowledged that the statutory "dead period" from 15 December 2024 to 5 January 2025 falls within this extension, the timeline still allowed for meaningful engagement before and after this window. Moreover, suggesting that the December/January period should be entirely excluded from public participation processes would effectively remove close to 20% of the year from consideration. This is impractical in a country that urgently requires infrastructure development to address critical socio-economic needs.</p> <p>The "6000 pages of documentation" referenced must be contextualised. This volume represents an iterative process, developed over time with continuous input from stakeholders. It is not a sudden or overwhelming "data dump" but a comprehensive compilation of detailed studies designed to address the project's complexity. Stakeholders, including Garden Cities, have been engaged throughout this process and have had multiple opportunities to provide input on the various phases of the documentation.</p> <p>CWA has also ensured that accessibility and inclusivity were prioritized, making documents available online and in physical formats, with multilingual notifications and multiple submission options. To further support meaningful engagement, an additional public consultation is planned for February 2025, offering another opportunity for stakeholders to provide input. This underscores CWA's commitment to transparency and inclusivity in its processes.</p> <p>We recognize that the December/January period may present challenges for some stakeholders. However, it is not practical to indefinitely delay critical processes to accommodate individual schedules, especially when balanced against the broader need for timely and effective infrastructure development.</p> <p>Finally, all comments raised by Garden Cities, including those submitted outside the stipulated timeframe, will be carefully considered and addressed in the Comments and Response Report. This ensures that all substantive feedback is accounted for prior to submission to the competent authority.</p>
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		<p>87. That fact, coupled with the December / January holiday season means that an extension to the public participation process was both unreasonable and unjustifiable in the circumstances. We are therefore duty bound to reiterate and emphasise our earlier expressed concern that the timeframes for public comment are unreasonable and truncated. In order to safeguard our client's rights we advise that any further comments (if any) regarding the DEIAR and/or specialist reports will be tabled before 15 February 2025.</p> <p>88. Due to the fact that a number of Garden Cities key representatives as well as specialists and technical advisors were on leave during the December / January period, which further undermined the ability of this key I&AP from being able to engage meaningfully, it is grossly unfair to expect Garden Cities to adhere to the public participation timeframes determined by the EAP at a time when it would be most constrained in terms of capacity to investigate the concerns with the DEIAR. Our comments tabled herewith demonstrate significant problems with the impact assessment undertaken during the EIA process and we require additional time for our concerns to be addressed before any reports are submitted to the competent authority. This unfortunate situation of I&APs forced to provide additional comment outside the EAP stipulated timeframe is directly attributable to how the EAP has dealt with the process. Until such time that Garden Cities' concerns with the evaluation and assessment of project impact are adequately addressed, it will result in protracted objections to ensure that their concerns be addressed properly.</p> <p>89. We trust that these comments (and any additional or subsequent comments) tabled by or on behalf of Garden Cities will be taken into account and responded to by the EAP accordingly</p> <p>SUMMARY</p> <p>90. These comments highlight several shortcomings of the DEIAR and the revised specialist studies. The conclusions drawn from them should be rejected, as the reports are not deemed to be factually correct or objective. The underlying</p>	<p>CWA remains fully committed to balancing statutory compliance, stakeholder inclusion, and the urgent need for infrastructure development that serves the interests of the broader community.</p> <p>87. The comment is noted. Comments received outside the commenting period or the extension timeframe granted by the EAP may be excluded in the amended draft EIAR. Further, an additional comment period will be provided once the draft EIAR is again circulated for comment.</p> <p>88. The comment is noted.</p> <p>As stated in the DEIAR - A further public participation period on the DEIAR is planned for early 2025 and IAPs will be provided with an additional commenting period on the amended draft EIAR.</p> <p>89. The EAP has responded.</p> <p>90. PHS response: The opinion by the IAP is noted.</p> <p>The EAP disagrees with the statement that the DEIAR and the associated specialist studies are deficient, lack credibility, or fail to align with the principles of sustainable development as outlined in NEMA and the Constitution. The process undertaken for the Cape Winelands Airport (CWA)</p>
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		<p>data used to support the conclusions and findings is not credible and critical scientific evidence is lacking in key respects.</p>	<p>project has been comprehensive, rigorous, and transparent, adhering not only to statutory requirements but exceeding them in several respects.</p> <p>90-97 CWA Response: We respectfully refute the assertions that the DEIAR and the associated specialist studies are deficient, lack credibility, or fail to align with the principles of sustainable development as outlined in NEMA and the Constitution. The process undertaken for the Cape Winelands Airport (CWA) project has been comprehensive, rigorous, and transparent, adhering not only to statutory requirements but exceeding them in several respects.</p> <p>Integration of Environmental Protection and Socio-Economic Development</p> <p>Contrary to the claim that the assessment subverts sustainable development objectives, the DEIAR and its associated specialist studies represent a balanced approach to integrating environmental protection with socio-economic development. The iterative nature of the assessment process, which incorporates stakeholder inputs and detailed specialist reviews, ensures that all relevant environmental, social, and economic considerations are holistically evaluated.</p> <p>The principles of sustainability, as outlined in Section 24 of the Constitution and Sections 2, 23, and 24 of NEMA, are central to the assessment process. Mitigation measures and proposed strategies have been developed to ensure that development proceeds responsibly, minimizing environmental impacts while maximizing socio-economic benefits for the region.</p> <p>Robustness of Data and Credibility of Findings</p> <p>The suggestion that the underlying data is not credible or that scientific evidence is lacking fails to consider the depth and breadth of specialist reports. These reports address a wide range of impacts, from biodiversity and noise to socio-economic and aviation-related concerns. Stakeholders, including Garden Cities, have had ample opportunity to engage with these reports throughout the process.</p> <p>Independent reviews and additional opportunities for engagement, such as the planned public consultation in February 2025, further underscore the commitment to transparency and the validity of the findings.</p> <p>Consideration of Impacts on the Receiving Environment</p>
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			<p>The claim that direct impacts on neighbouring residential areas and landholdings have been ignored is unfounded. The DEIAR includes assessments of the immediate receiving environment, with detailed evaluations of noise, air quality, and socio-economic impacts. Stakeholder concerns have been systematically documented and incorporated into the Comments and Response Report, demonstrating a commitment to addressing these issues comprehensively.</p> <p>Adequacy of Public Participation</p> <p>The extension of the comment period to 13 January 2025, while accommodating the December/January "dead period," was intended to provide stakeholders with additional time to engage meaningfully. This extension, coupled with accessibility measures such as multilingual notifications, online and physical document availability, and the planned February 2025 consultation, reflects a process that exceeds statutory requirements. While it is acknowledged that the December period may pose challenges for some stakeholders, excluding it entirely would effectively remove nearly 20% of the year from critical decision-making—a position that is neither practical nor conducive to South Africa's urgent infrastructure development needs.</p> <p>Conclusion</p> <p>The claims that the process is deficient and that the project is poorly conceived are not supported by the evidence. The DEIAR and specialist reports represent a comprehensive, iterative, and inclusive process that aligns with the principles of sustainable development. Stakeholder concerns have been acknowledged and will be addressed in the Comments and Response Report before submission to the competent authority.</p> <p>CWA remains committed to transparency, inclusivity, and a balanced approach to development, ensuring that environmental protection and socio-economic progress go hand in hand. The ongoing engagement process demonstrates a genuine effort to incorporate diverse perspectives and achieve an equitable and sustainable outcome.</p> <p>CWA has no impact on Phase/Parcel 1-3.</p>
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		<p>91. The assessment approach undermines sections 2, 23 and 24 of NEMA which contemplate the integration of environmental protection and socio-economic development. NEMA read with section 24 of the Constitution envisages that environmental considerations will be balanced with socio-economic considerations through the ideal of sustainable development.</p> <p>92. The critical importance of integration is apparent from section 24(b)(iii) of the Constitution which provides that the environment will be protected by securing “ecologically sustainable development and use of natural resources while promoting justifiable economic and social development”. Sustainable development and sustainable use and exploitation of natural resources are at the core of the protection of the environment. The comments show how this objective is subverted by the current assessment.</p> <p>93. The assessment approach undertaken in connection with this proposed CWA project – by brushes aside or ignores key constraints from a socio-economic and environmental perspective is deeply flawed. The extent to which the DEIAR and specialist reports suggest that ‘economic sustainable’ mitigations measures can somehow result in acceptable levels of impact is unfounded.</p> <p>94. Direct impacts on neighbouring residential areas continue to be ignored. Impacts on the immediate receiving environment (on neighbouring landholdings) have not been assessed.</p> <p>95. On balance the impact assessment process for the proposed CWA project is deficient and based on the identification of significant and irreversible impacts, the proposed CWA project is poorly conceived and not desirable.</p>	<p>Phase/Parcel 4 rights have expired. Phase/Parcels 5-7 are conceptual.</p> <p>91. The EAP takes note of the IAP opinion and comment.</p> <p>92. The EAP takes note of the IAP opinion. The EIA process followed to date incorporates stakeholder inputs, technical design and specialist assessment, ensuring that environmental, social, and economic considerations are evaluated.</p> <p>93. The EAP takes note of the comment. The EIA process followed to date incorporates stakeholder inputs, technical design and specialist assessment, ensuring that environmental, social, and economic considerations are evaluated, resulting in sustainable mitigation incorporated into the EMPr.</p> <p>94. Impacts assessed on neighbouring land parcels and their receiving environment are included in the Air Quality IA, the Noise IA, the Socio-economic IA, the Geohydrological IA, the Visual IA, the Poultry Biosecurity Assessment, Bird Strike Risk Assessment, Major Hazard Installation Risk Assessment, Climate Change Impact Assessment, Transport IA, OLS Height Restrictions amongst others.</p> <p>95. The EAP notes the comment.</p> <p>96. Noted</p>
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		<p>96. In support of these comments please see the Letter of Objection by Garden Cities dated 13 January 2025 attached hereto as Annexure F.</p> <p>97. Where relevant (and where possible given the unreasonably short commenting period) these comments are supported by independent expert reviews and other documents – all of which are incorporated as Annexure to these comments. The EAP is requested to ensure that the Annexures to these comments are not ignored but rather must be read as forming part of these comments and responded to accordingly. The following Annexures form part of these comments:</p> <table border="1" data-bbox="409 523 1265 831"> <tr> <td>1.</td> <td>Annexure A</td> <td>Garden Cities letters of objection dated 5 December 2023.</td> </tr> <tr> <td>2.</td> <td>Annexure B</td> <td>Greenville Garden City Conceptual Land Use Plan dated December 2015</td> </tr> <tr> <td>3.</td> <td>Annexure C</td> <td>Review of the NIA for Cape Winelands Airport Expansion dated 5 December 2024 prepared by Sound Research Laboratories South Africa (Pty) Ltd</td> </tr> <tr> <td>4.</td> <td>Annexure D</td> <td>Map indicating areas of impact from noise cones of the proposed CWA project by MLH Architects dated September 2023</td> </tr> <tr> <td>5.</td> <td>Annexure E</td> <td>Letter from Minister Anton Bredell concerning Noise Contours for Planning Decisions Around the Cape Town International Airport (CTIA) dated 9 May 2011</td> </tr> <tr> <td>6.</td> <td>Annexure F</td> <td>Garden Cities letter of objection dated 13 January 2025</td> </tr> </table> <p>Annexures A-F are attached as Appendix E (C341) to this C&R Report and responded to below.</p>	1.	Annexure A	Garden Cities letters of objection dated 5 December 2023.	2.	Annexure B	Greenville Garden City Conceptual Land Use Plan dated December 2015	3.	Annexure C	Review of the NIA for Cape Winelands Airport Expansion dated 5 December 2024 prepared by Sound Research Laboratories South Africa (Pty) Ltd	4.	Annexure D	Map indicating areas of impact from noise cones of the proposed CWA project by MLH Architects dated September 2023	5.	Annexure E	Letter from Minister Anton Bredell concerning Noise Contours for Planning Decisions Around the Cape Town International Airport (CTIA) dated 9 May 2011	6.	Annexure F	Garden Cities letter of objection dated 13 January 2025	<p>97. Noted.</p>
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		<p>Annexure A: Garden Cities letters of objection dated 5 December 2023.</p>	<p>The Garden Cities letter of objection dated 5 December 2024 has been responded to in the Pre-Application Comments and Response Report as comment number 58.</p>																		
		<p>Annexure B: Greenville Garden City Conceptual Land Use Plan dated December 2015</p>	<p>Noted by EAP</p>																		
		<p>Annexure C: Review of the NIA for Cape Winelands Airport Expansion dated 5 December 2024 prepared by Sound Research Laboratories South Africa (Pty) Ltd: 1.0. Introduction</p>	<p>Refer responses by noise specialist:</p>																		

Garden Cities NPC (RF) has appointed Sound Research Laboratories South Africa (Pty) Ltd to review the report Noise Impact Assessment For The Proposed Cape Winelands Airport Expansion by Demos Dracoulides of DDA Environmental Engineers dated 15 October 2024. The report claims to assess the noise impact of the proposed commercial airport (Cape Winelands Airport) on the airfield previously known as Fisantekraal Airfield. The report includes residual noise measurements of the site and surroundings (though not in the proposed flight path), and modelled noise levels on the surrounding areas using the Aviation Environmental Design Tool (AEDT) from the US Federal Aviation Administration (FAA). The report sets out impractical and vague measures for noise mitigation but does not consider moving the runway as one of the primary and most effective noise mitigation options. This report reviews the approach to the assessment and the content of the assessment.

2.0. Assessment Criteria

The assessment sets out a range of criteria and codes:

- SANS 10117: Calculation and prediction of aircraft noise around airports for land use purposes
- SANS 10103: The measurement and rating of environmental noise with respect to annoyance and to speech communication
- SANS 10328: Methods for environmental noise impact assessments
- Australian Standard AS2021-2015: Acoustics – Aircraft noise intrusion – Building siting and construction
- WHO guidelines (1999, 2009)
- International Finance Corporation (IFC) 2007 Environmental, Health, and Safety (EHS) Guidelines
- Western Cape Noise Control Regulations, 2013

These standards, guidelines, and regulations set a range of guidelines for environmental noise generally and for aircraft noise.

The local applicable regulations are the Western Cape Noise Control Regulations, 2013. These regulations require that for land use applications, the

“1.0 Introduction ... The report sets out impractical and vague measures for noise mitigation but does not consider moving the runway as one of the primary and most effective noise mitigation options.”

For the CWA airport, moving the runway was not an option. The location was carefully identified and selected based on Airspace Availability, Prevailing Wind Conditions, Topography, Runway Orientation, Proximity and Orientation in relation to Existing Airports.

The claim that these mitigation measures are "vague" and "impractical" suggests that the review author has a limited understanding of ICAO's Balanced Approach to noise mitigation, which is the foundation of the noise impact assessment report.

The ICAO Balanced Approach to Aircraft Noise Management is a framework developed by the International Civil Aviation Organization (ICAO) to address and mitigate aircraft noise in a systematic and effective way and remains the global standard for noise management at airports.

“2.0 Assessment Criteria ... According to the Western Cape Noise Control Regulations, 2013 and SANS 10103, a noise event above 70 dBA would:

- ***Exceed the threshold for a daytime disturbing noise by at least 13 dBA***
 - ***The noise would therefore be classified as a disturbing noise” ...”***

The reviewer here misrepresents the intention of the SANS 10103 when he compares the N70 events, which refers to the number of the events that momentarily the L_{max} will reach in a specific location, with the L_{Req} at the same location.

The rationale for comparison in the review of various exceedances, which is based on N70, is flawed. The SANS 10103 Code specifies that comparisons should be made using L_{Req} exceedances relative to the guideline limits, not L_{max} (the basis of N70) in relation to L_{Req}.

For example, an event's L_{max} can be 20 dB higher than an L_{Req} guideline of 50 dBA, while the event's L_{Req} still remains below the

applicant must submit: *a noise impact assessment in accordance with SANS 10328 to establish whether the noise impact rating of the proposed land use or activity exceeds the appropriate rating level for a particular district as indicated in SANS 10103*

The report under review likely serves as this noise impact assessment.

The regulations state that where the assessment shows that the rating level will likely be exceeded:

- (a) the applicant must provide a noise management plan, clearly specifying appropriate mitigation measures to the satisfaction of the local authority, before the application is decided; and
- (b) implementation of those mitigation measures may be imposed as a condition of approval of the application.

Note that this requires that the noise management plan with “appropriate mitigation measures to the satisfaction of the local authority” must be provided “before the application is decided”.

The assessed district in Greenville Garden City is “(b) Suburban district with little road traffic” with outdoor rating levels of daytime LReq,d 50 dBA, night-time LReq,n 40 dBA, and day-night LReq,dn of 50 dBA.

A noise management plan is therefore required by the Regulations if the noise level exceeds LReq,dn 50 dBA. Notably, the Day-Night noise rating plot in Figure 4-12 of the report does not show the 50–55 dBA contour but instead starts at 55 dBA. Is this to show a smaller affected area and reduce the perceived impact of the airport on the surrounding areas?

The Regulations define a disturbing noise as a noise that “exceeds the rating level by 7 dBA”. For daytime, this means a disturbing noise is a noise level that exceeds LReq 57 dBA.

The Australian Standard AS2021-2015 uses a metric Noise Above 70 dBA (N70) to assess the noise impact on a community as noise levels above this are likely to “interfere with conversation or with listening to the radio or the television”. This would clearly disrupt both domestic and educational land uses.

guideline. The attempted comparison misrepresents the intent of the Code, as well as the rationale of the NIA report.

This is further evident in the SANS table included in the review, which explicitly refers to comparing ΔL_{Req} —the difference between LReq values (as indicated by the green marking in the table).

Table 5 — Categories of community or group response

1	2	3
Excess ($\Delta L_{Req,T}$) ^a dBA	Estimated community or group response	
	Category	Description
0 to 10	Little	Sporadic complaints
5 to 15	Medium	Widespread complaints
10 to 20	Strong	Threat of community or group action
>15	Very strong	Vigorous community or group action

NOTE: Overlapping ranges for the excess values are given because a spread in the community reaction might be anticipated.

^a $\Delta L_{Req,T}$ should be calculated from the appropriate of the following:

- 1) $\Delta L_{Req,T}$ = $L_{Req,T}$ of ambient noise under investigation MINUS $L_{Req,T}$ of the residual noise (determined in the absence of the specific noise under investigation);
- 2) $\Delta L_{Req,T}$ = $L_{Req,T}$ of ambient noise under investigation MINUS the maximum rating level for the ambient noise given in table 1;
- 3) $\Delta L_{Req,T}$ = $L_{Req,T}$ of ambient noise under investigation MINUS the typical rating level for the applicable district as determined from table 2; or
- 4) $\Delta L_{Req,T}$ = Expected increase in $L_{Req,T}$ of ambient noise in an area because of a proposed development under investigation.

“3.0 Assessment Methodology

3.1. No Go” scenario

This scenario is described in contradictory terms through the report:

- “Existing runways at full capacity” (page 1-12)
 - Refers to four “existing runways” and a “typical busy day”
 - It must be noted that two of the four runways are in fact currently not in use. One has a go-kart track or similar built on it.

		<p>Regarding community response to noise levels, SANS 10103 includes a table estimating community response to noise.</p> <p>According to the Western Cape Noise Control Regulations, 2013 and SANS 10103, a noise event above 70 dBA would:</p> <ul style="list-style-type: none"> • Exceed the threshold for a daytime disturbing noise by at least 13 dBA <ul style="list-style-type: none"> ○ The noise would therefore be classified as a disturbing noise ○ The regulations state “2. A person may not allow a disturbing noise to be caused” • Exceed the district rating level by at least 20 dBA <ul style="list-style-type: none"> ○ This is a higher excess than 15 dBA, therefore the response category is “Very strong” described as “Vigorous community or group action”. <p>It is therefore clear that according to the Western Cape Noise Control Regulations, 2013:</p> <p>1) For noise levels above 50 dBA</p> <p>a) The applicant must submit a noise management plan to the local authority showing how this noise will be controlled</p> <p>2) For noise levels above 70 dBA</p> <p>a) A disturbing noise is quite clearly created</p> <p>b) Disturbing noises are prohibited by the regulations</p> <p>c) “Vigorous community or group action” can be expected.</p>	<ul style="list-style-type: none"> ○ <i>A “typical busy day” currently most likely involves the use of light aircraft on two runways and go karts on a third.</i> • <i>“Existing operations at full capacity”...</i> <p>The comments in this section of the review regarding the No-Go scenario’s description reflects a misunderstanding of the methodology and intent of the Noise Impact Assessment (NIA). The No-Go scenario is designed to assess environmental impacts based on the assumption that all existing infrastructure, including the four runways, could operate at their full potential. This is a standard approach in Environmental Impact Assessments (EIAs) to establish a conservative baseline for comparison.</p> <p>While it is true that only two runways are currently in use for aviation operations—one of which features an unutilized go-kart track—the inclusion of all four runways accounts for their theoretical capacity, ensuring that baseline impacts are not underestimated. This methodology aligns with regulatory expectations and industry best practices, which prioritize potential capacity over current utilization.</p> <p>Furthermore, the CWA has the authority to resurface and repaint the unused runways and apply to the South African Civil Aviation Authority (SACAA) for their reinstatement for aviation use without requiring public involvement. Since all four runways have been in place and operational at various times since 1943, they remain part of the airport’s infrastructure and could be brought back into use, reinforcing the validity of assessing full operational capacity.</p> <p>The existing CWA runway system is authorized for use as outlined in the No-Go alternative of the NIA.</p> <p>A fundamental best practice in aircraft noise impact assessments is to compare scenarios based on “worst-case” operational conditions for each authorized or proposed phase. The No-Go alternative represents the maximum realistic utilization of the current CWA runway system. This worst-case scenario was selected to provide a direct comparison with the worst-</p>
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Table 5 — Categories of community or group response

Excess ($\Delta L_{\text{res},T}$) ^a dBA	Estimated community or group response	
	Category	Description
0 to 10	Little	Sporadic complaints
5 to 15	Medium	Widespread complaints
10 to 20	Strong	Threats of community or group action
>15	Very strong	Vigorous community or group action

NOTE: Overlapping ranges for the excess values are given because a spread in the community reaction might be anticipated.

^a $\Delta L_{\text{res},T}$ should be calculated from the appropriate of the following:

- 1) $\Delta L_{\text{res},T} = L_{\text{res},T}$ of ambient noise under investigation MINUS $L_{\text{res},T}$ of the residual noise (determined in the absence of the specific noise under investigation);
- 2) $\Delta L_{\text{res},T} = L_{\text{res},T}$ of ambient noise under investigation MINUS the maximum rating level for the ambient noise given in table 1;
- 3) $\Delta L_{\text{res},T} = L_{\text{res},T}$ of ambient noise under investigation MINUS the typical rating level for the applicable district as determined from table 2; or
- 4) $\Delta L_{\text{res},T} =$ Expected increase in $L_{\text{res},T}$ of ambient noise in an area because of a proposed development under investigation.

Figure 2.1: Table 5 from SANS 10103:2008

3.0. Assessment Methodology

The report models predicted noise levels from 3 proposed scenarios. Day/night LR,dn noise levels are predicted, as well as the occurrence of noise levels above 70 dBA (N70).

Three scenarios are proposed:

- 1) A “No Go” scenario described as the condition if the proposed new airfield does not go ahead
- 2) The new development in its first year
- 3) The new development at expected operating capacity

3.1. “No Go” scenario

This scenario is described in contradictory terms through the report:

- “Existing runways at full capacity” (page 1-12)
 - Refers to four “existing runways” and a “typical busy day”
 - It must be noted that two of the four runways are in fact currently not in use. One has a go-kart track or similar built on it.

case, or maximum, utilization of the new CWA runway, ensuring a comprehensive assessment of potential noise impacts.

“3.2 New development in its first year This scenario has no relevance to the application. The application is for the fully developed airport. Noise levels in the first year are irrelevant.”

The assertion that including the first-year scenario in the Noise Impact Assessment (NIA) is misleading or irrelevant misrepresents the purpose and standard methodology of noise modelling.

Phased development is a core aspect of the proposed Cape Winelands Airport (CWA) project, with operations expanding incrementally over time. Incorporating the first-year operational scenario aligns with industry best practices, enabling Interested and Affected Parties (I&APs) to understand the gradual progression of impacts rather than assuming an immediate transition to full-scale operations.

The first-year scenario is particularly valuable as it establishes a baseline for noise impacts during initial operations, serving as a crucial reference point for comparing early-phase and full-scale effects. Additionally, it informs the phased development of mitigation strategies, ensuring that noise management evolves alongside airport operations. The inclusion of this scenario follows standard Environmental Impact Assessment (EIA) practices, emphasizing responsible and realistic impact evaluation rather than misleading stakeholders.

“4.0 Review of Content

Page 1-11

The report identifies that Greenville Garden City will be a residential development. Figure 1-1 labels all runways as if they are currently operational. Figure 3.2 in this report shows that only two are labelled and operational, with a go-kart track or similar on one runway.”

A response to this comment has already been provided in the discussion above regarding the No-Go alternative and existing runways.

“Page 1-12

- A “typical busy day” currently most likely involves the use of light aircraft on two runways and go karts on a third.
- “Existing operations at full capacity” (page 4-17)
- “It is expected that these noise levels would be reached if the proposed new runway does not go ahead” (page 4-20)

This “full capacity” number of flights is predicted in Table 4-5 (included as Figure 3.1) as a suspiciously round number of operations (100 arrivals + 101 circuits + 100 departures = 301). I note that Table 4-5 is included twice; once with and once without figures for the “DASH 6/PT6A-27 RAISBECK QUIET PROP MOD”.

This level of activity is completely different from the actual current use of the airfield. Two of the four runways are not in use, with a go-kart track on one of the runways (Figure 3.2).

The current airfield is in fact barely used. The noise survey data for the area bears this out. The noise monitoring position MP01 on the airfield measured a noise level of LAeq 54 dBA on two days. This is not consistent with a busy airfield. On page 3-4, measurement position MP01 is described as follows: “Currently at MP01, the main noise sources are the limited light aircraft flights, occasional vehicular traffic, nature sounds and limited human activities.”

The proposed “current scenario” is not the current scenario. It is an imagined “maximum possible capacity” scenario to attempt to inflate the current usage and therefore “possible noise levels” compared to which the increase to a full commercial airport would not seem as large an increase.

The fact is that based on current usage and noise survey data, the current airfield is a quiet area, with measured noise levels far below the imagined “No-Go” scenario.

The correct modelling tool is identified and used for the assessment: Aviation Environmental Design Tool (AEDT) from the US Federal Aviation Administration (FAA). Three operational scenarios are introduced. See comments in Section 3 of this report showing that Scenario 2 is irrelevant and that Scenarios 1 and 3 seem to use data for the modelling to elevate the impact of the No-Go Scenario 1 and downplays the impact of the fully operational facility (Scenario 3)."

The No-Go alternative reflects a realistic utilization of the existing CWA runway system and serves as a valid representation of the worst-case scenario under the airport’s current authorisation.

This worst-case scenario was selected to provide a direct comparison with the maximum possible utilization of the new CWA runway (Scenario 3), ensuring a comprehensive assessment of potential impacts.

The first-year scenario (Scenario 2) is particularly valuable as it establishes a baseline for noise impacts during initial operations, serving as a crucial reference point for comparing early-phase and full-scale effects. Additionally, it informs the phased development of mitigation strategies, ensuring that noise management evolves alongside airport operations. The inclusion of this scenario follows standard Environmental Impact Assessment (EIA) practices, emphasizing responsible and realistic impact evaluation rather than misleading stakeholders.

“Page 2-7

Is the report complete? Was there a section to be completed or included?”

The reference to “??” on page 2-7 is a placeholder error in the draft that does not undermine the overall assessment. Such typographical issues are procedural, not substantive, and do not affect the findings of the report. The “??” was removed.

“Page 2-8

Regarding a noise nuisance, the Western Cape Noise Control Regulations, 2013 state “in so far as it causes or is likely to cause a noise nuisance, a person may not...operate...aircraft...near a residential area”.

Table 4-5 Current Runway System at Full Utilisation (Scenario 1)

Aircraft ID	Aircraft Model	Operations			
		Runway 01-19, 32-14, 05-23			
		Arr.	Circ.	Dep.	Total
C172	CESSNA 172R	300	0	100	157
DHC6P	DASH 6/PT6A-27 RAISBECK QUIET PROP MOD	0	0	0	43
P28A	PIPER WARRIOR PA-28-161	0	101	0	101
Grand Total (24-hour)		300	101	100	301

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Aircraft ID	Aircraft Model	Operations			
		Runway 03-21			
		Arr.	Circ.	Dep.	Total
C172	CESSNA 172R	78	0	79	157
DHC6P	DASH 6/PT6A-27 RAISBECK QUIET PROP MOD	22	0	21	43
P28A	PIPER WARRIOR PA-28-161	0	101	0	101
Grand Total (24-hour)		300	101	100	301

Circuit: Training flights

Figure 3.1: Predicted number of operations at the existing airfield

Aircraft from the proposed full commercial airfield would predominantly take off directly over the Greenville Garden City residential area. The end of the proposed new runway is approximately 600 metres from the Greenville Garden City residential area. Conservatively assuming a large aircraft takes off 1,000 metres from the end of the runway, then at a typical 3rd departure angle the aircraft would be only 84 metres above the first houses. This is clearly an aircraft operating near a residential area.”

While the Garden Cities comment emphasizes the proposed runway's proximity to Greenville Garden City, the NIA fully accounts for this sensitivity by including the area within its noise contour analysis.

The take-off and landing profiles are modelled in accordance with standard aviation practices, ensuring accurate representation of aircraft altitudes. Additionally, the regulatory language referenced applies to activities occurring directly within residential areas, not to overflights, which are a standard aspect of airport operations worldwide.

“Page 3-3

Figure 3-1 has errors with the labelling and the key. There are no measurement positions in the key residential area under the proposed flight path.”

The word version does contain the letters of the monitoring locations in the captions of Figure 3-1. During the conversion to PDF format these were lost, due to font incompatibilities. The 2nd Draft of the report has corrected this labelling error.

Adding a monitoring position in a farmland area where residential development is planned would result in inaccurate baseline levels. The establishment of such a residential area would itself alter baseline noise levels, increasing them due to local vehicular traffic and various human activities.

The NIA relies on validated noise monitoring data that comply with regulatory requirements. While measurement points may not be located directly within Greenville, the modelling tools used (e.g., AEDT) accurately predict noise impacts across affected areas, including residential zones under flight paths, ensuring a comprehensive assessment. Any labelling errors in Figure 3-1 are



Figure 3.2: Current airfield showing 2 runways in use and 2 derelict runways (one with go-kart track)

3.2. New development in its first year

This scenario has no relevance to the application. The application is for the fully developed airport. Noise levels in the first year are irrelevant.

3.3. New development at operating capacity

The development is modelled at full capacity assuming the following:

- 208 operations per day
 - 52 arrivals and departures are commercial aircraft (Airbus A330, Boeing 737-series, Boeing 777)
 - This is an increase from 0 to 52 over existing operations.
- No passenger flights between 22h00 and 06h00
 - It must be noted that, not including for delayed flights:

minor presentation issues that do not affect the validity of the data or conclusions.

“Page 3-5

There are severe data processing errors and omissions in Table 3-3. Overall noise levels in Table 3-3 were calculated incorrectly and measurement durations are omitted. Decibels work on a logarithmic scale so average noise levels must be calculated logarithmically (and scaled proportionately to each measurement duration). As this is a fundamental acoustic error it casts doubt on the credibility of the overall assessment. For example, MP05 daytime noise levels are recorded as 39.0 and 43.5 dBA with the Overall stated as 41.2 dBA. This is (incorrectly) the arithmetic mean. The correct Overall should be 41.8 dBA.”

As indicated in the NIA report, all measurements were carried out in accordance with the:

SOUTH AFRICAN NATIONAL STANDARD - Code of Practice, SANS 10103:2008, The measurement and rating of environmental noise with respect to land use, health, annoyance and to speech communication.

As such, all intermittent measurements were between 12 minutes and 15 minutes, i.e. more than 10 minutes in duration, as specified in the Code. In addition, at one location within the Fisantekraal residential area (MP04), the monitoring was conducted continuously for 7 days.

The reviewer's comment on the logarithmic calculation of noise levels reflects a misunderstanding of the methodology. While averaging noise data using arithmetic means may seem incorrect, it is commonly used for specific reporting purposes, particularly when noise levels are very similar, like background noise levels in an area. The term “overall” does not imply a logarithmic average of intermittent measurements but rather represents an indication of the applicable district level.

Furthermore, this "overall" level represents a worst-case scenario, as it yields a lower value than the logarithmic average suggested by the reviewer, thereby setting a more stringent noise baseline (41 dBA instead of 42 dBA).

“Page 3-6

- Cape Town International Airport (CPT) typically has 5–7 passenger flight operations in this time
- Lanseria Airport (HLA) typically has one departure and one arrival in this time
- No Airbus A380, A350, or Boeing 747 operations
 - The “large” aircraft modelled are Airbus A330, Boeing 737, Boeing 777
 - If these larger aircraft (especially the A380) are not modelled, does the application specifically state that the airport will not cater for or permit these large aircraft?
 - The runway is classified as a “Code F” runway at 3,500m to accommodate larger aircraft than CTIA, which has a shorter 3,200m runway.
 - Cape Winelands Aero press releases specifically name the A380 as an aircraft being accommodated (press release dated 2023/12/12, extract in Figure 3.3).
 - Larger aircraft such as the A380 have a longer roll and therefore are lower to the ground at the end of the runway. They are heavier and generally noisier. This results in higher noise levels on the ground. Excluding large aircraft from the model while advertising their use in the media is inconsistent and likely underestimates noise levels.

The modelled operations do not seem to match either the stated use of the airfield in the media, or the similar uses of the CTIA or HLA to which the airfield claims to be similar.

The noise monitoring in Fisantekraal was done on the 2022 Easter weekend, with MP04 on top of a local residence. The report mentions that the Sunday was notably loud but makes no mention of the weekend being Easter weekend. It does not mention that it might have been an unusual scenario of Easter Sunday festivities (17 April 2022). The whole weekend was quite possibly unusual noise monitoring conditions. This weekend should have been avoided for “typical” noise level measurements. If the survey had to be done on this weekend, then the reason(s) for this should be stated and the uncertainty of the data should be reported.”

Noise monitoring conducted during the Easter weekend, while potentially atypical, does not invalidate the data. The NIA accounts for noise level variability and adjusts modelling parameters to reflect long term averages rather than isolated events. The selection of specific survey dates is a practical consideration and does not compromise the overall conclusions of the assessment.

As can be seen from the noise monitoring data (Table 3-2) two additional days were utilised, i.e. the 28th and 29th of April 2022. In addition, the noise monitoring in the Fisantekraal residential area (MP04) took place from the 14th off April to 22nd of April 2022, spanning more than seven days, including periods unaffected by loud music and increased human activity. The NIA report states: “It can be seen from Figure 4-2 that the daytime noise levels were maintained between 55 dB(A) and 60 dB(A), with some exceptions, primarily on Sunday, April 17, due to increased human activities and loud music.” This explicitly acknowledges that noise levels on April 17 were higher than on other monitoring days.

The conclusion that noise levels in the area (excluding those recorded on April 17) exceeded the SANS guideline levels for Urban Residential Districts remains valid.

“Page 4-1

Construction noise is likely not a noise impact for the development. Construction noise is limited to specific hours though there is not a local noise limit for construction noise. BS 5228-1 (1984) is stated as used. Note that BS 5228-1:2009+A1:2014 is the current version of the standard.”

12 DECEMBER 2023
FOR IMMEDIATE RELEASE

Exciting Announcement: Cape Winelands welcomes airport expansion.

...

Facts and Figures

- Main Runway - 3500m can accommodate (Boeing A380).

Figure 3.3: Extract from Cape Winelands Aero dated 2023/12/12 stating that the 3,500m runway is specifically designed to cater for the Airbus A380

4.0. Review of Content

Page 1-11

The report identifies that Greenville Garden City will be a residential development.

development will be a mixed residential and lifestyle golf estate. The second is the Greenville Garden City development, which is located south of the CWA and the R312. The Greenville Garden City will be a residential development.

Figure 1-1 labels all runways as if they are currently operational. Figure 3.2 in this report shows that only two are labelled and operational, with a go-kart track or similar on one runway.



The use of BS 5228-1 for construction noise modelling remains valid, as the core principles are consistent across versions, with minimal changes in equipment sound power levels. The calculated construction noise, derived from measured sound pressure levels and reflecting a typical mix of construction equipment operating simultaneously, ensures a reliable assessment.

“Page 4-4

A “typical busy day” is presented as the very round number of 100+100+101=301 operations. This is in stark contrast to the reports noise survey levels and observations of the site “the main noise sources are the limited light aircraft flights”. The split in aircraft identifies that the vast majority of landing and taking off operations (157 of 200) will specifically be Cessna 172R aircraft. Is this a true reflection of nearby airfields and the types of aircraft used?”

The modelling of a “typical busy day” with 301 operations represents a hypothetical maximum capacity scenario designed to assess the worst-case impacts. This approach aligns with standard EIA practices, ensuring a conservative and comprehensive evaluation of impacts. The comment from Garden Cities regarding Cessna aircraft numbers is irrelevant to the noise assessments, as the report focuses on the total volume of operations, not the distribution of aircraft types.

The number of flights and aircraft types for the typical busy day, which serves as the worst-case scenario for each of the models, were identified in the detailed study: “NACO, ATNS, NLR, 2023. Development of an Airspace CONOPS for the Cape Winelands Airport. 02 November 2023.” This study, which contributed to the EIA, provided the data used for the noise modelling.

“Page 4-7

The assessment attempts to compare the fully operational airport activities to the imagined operational levels of the current derelict airfield by comparing the number of operations. By stating that the fully operational airport “peak general aviation traffic under Scenario 3 will not exceed the current maximum operational capacity of Scenario 1” the assessment incredibly misleadingly implies that the noise from a Cessna is the same as

Page 1-12

The correct modelling tool is identified and used for the assessment: Aviation Environmental Design Tool (AEDT) from the US Federal Aviation Administration (FAA).

Three operational scenarios are introduced. See comments in Section 3 of this report showing that Scenario 2 is irrelevant and that Scenarios 1 and 3 seem to use data for the modelling to elevate the impact of the No-Go Scenario 1 and downplays the impact of the fully operational facility (Scenario 3).

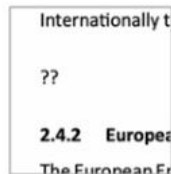
Page 2-4

N70 is identified as a noise level “likely to interfere with conversation” indoors.

The Australian Standard AS2021¹ specifies the single event level of 60 dB(A) as “the indoor design sound level for normal domestic areas in dwellings”, since this is the level at which “a noise event is likely to interfere with conversation or with listening to the radio or the television”. Given that a house

Page 2-7

Is the report complete? Was there a section to be completed or included?



Page 2-8

Regarding a noise nuisance, the Western Cape Noise Control Regulations, 2013 state “in so far as it is causes or is likely to cause a noise nuisance, a person may not...operate...aircraft...near a residential area”.

Aircraft from the proposed full commercial airfield would predominantly take off directly over the Greenville Garden City residential area. The end of the proposed new runway is approximately 600 metres from the Greenville Garden City residential area. Conservatively assuming a large aircraft takes off 1,000 metres from the end of the runway, then at a

the noise from a Boeing 777. In reality, the actual difference between Scenario 1 and Scenario 3 is an increase from zero large aircraft operations to 52 large aircraft operations per day.

The paragraph following this one (included below) is simply untrue and is disproved by the assessment. Noise levels from the “general aviation operations” will specifically NOT “always be lower than those with the existing operations at full capacity”. Figure 4-8 shows predicted noise levels for the supposed Scenario 1, while Figure 4-13 shows noise levels for the operational airport. Extracts are included in Figure 4.2 of this report, clearly showing that this claim is materially false.”

The reviewer comment conflates the general aviation operations modelled in Scenario 1 with the expanded operations in Scenario 3. The NIA transparently compares these scenarios, and the inclusion of larger commercial aircraft in Scenario 3 reflects a realistic and clear expansion plan. The claim that noise levels are understated is speculative and unsupported by evidence. The modelling confirms compliance with both SANS and ICAO guidelines.

The comment misinterprets the NIA’s comparison between Scenario 1 (current maximum operational capacity) and Scenario 3 (fully operational CWA). The statement that general aviation noise levels in Scenario 3 will be lower than those in Scenario 1 refers specifically to the relative contribution of general aviation operations, not the cumulative noise impacts of all operations. The NIA clearly accounts for the introduction of larger commercial aircraft and their associated noise levels in Scenario 3.

The noise contour maps included further illustrate the modelled outcomes. The left map outlines district noise level guidelines as per SANS 10103, with urban residential areas set at 55 dBA, while the right map shows the noise contours under Scenario 3. These visuals demonstrate areas where noise levels exceed district limits by 5–10 dBA and more than 10 dBA, particularly impacting the Greenville Garden City residential area. The maps support the conclusion that noise levels under Scenario 3 will exceed those in Scenario 1, particularly due to the introduction of larger aircraft.

This is not contradictory or misleading, as the NIA explicitly models these impacts and evaluates them within regulatory frameworks. Additionally, mitigation strategies are proposed to address these noise exceedances,

typical 3rd departure angle the aircraft would be only 84 metres above the first houses. This is clearly an aircraft operating near a residential area.

Page 3-2

Why was no noise monitoring done (or if done then not reported) in the current or proposed scenario's flight paths? These are critical positions for the noise study to assess but are instead carefully not addressed.

Page 3-3

Figure 3-1 has errors with the labelling and the key. There are no measurement positions in the key residential area under the proposed flight path.

Page 3-5

There are severe data processing errors and omissions in Table 3-3.

Overall noise levels in Table 3-3 were calculated incorrectly and measurement durations are omitted. Decibels work on a logarithmic scale so average noise levels must be calculated logarithmically (and scaled proportionately to each measurement duration). As this is a fundamental acoustic error it casts doubt on the credibility of the overall assessment.

For example, MP05 daytime noise levels are recorded as 39.0 and 43.5 dBA with the Overall stated as 41.2 dBA. This is (incorrectly) the arithmetic mean. The correct Overall should be 41.8 dBA. The difference between arithmetic and logarithmic means for two noise levels L1 and L2 are shown below.

$$L_{\text{arithmetic}} = \frac{L_1 + L_2}{2}$$
$$L_{\text{logarithmic}} = 10 \log \left(\frac{10^{L_1/10} + 10^{L_2/10}}{2} \right)$$

including operational adjustments and noise management plans. The reviewer comment's assertion of misleading comparisons overlooks the NIA's transparency and its adherence to regulatory and methodological standards.

"Page 4-8

Table 4-8 shows that the number of large aircraft is expected to be 52 per day. Note that the noisier Airbus A380—specifically advertised in the press as an aircraft to be catered for by the longer runway—is not included in this list. The Airbus A350 is also not included in the list, even though it is used in press releases regarding current aircraft landing at CPT.

Not including larger aircraft such as the Airbus A380 or A350 is not an omission, as these aircraft are exceptions rather than the norm for operations at CWA. The modelling focuses on fleet mixes that are expected to dominate operations, providing a robust and relevant assessment of the anticipated impacts.

The A380 adheres to stricter noise regulations and generates lower noise levels during take-off and landing compared to the 777. This is due in part to its quieter Rolls-Royce Trent 900 or Engine Alliance GP7200 engines, as well as its overall design focused on noise reduction.

While the 777 is quieter than many older aircraft, it still produces higher external noise levels, particularly in the case of older models like the 777-200 and 777-300. The newer 777X, however, has seen significant improvements in noise reduction, with quieter engines and an optimized airframe design.

The number of flights as well as the aircraft types for the typical busy day, which serves as the worst case scenario for each of the modelled scenarios, were identified in the detailed study: "NACO, ATNS, NLR, 2023. Development of an Airspace CONOPS for the Cape Winelands Airport. 02 November 2023."

"Page 4-11

The prevailing southeast wind means the noisier take-off operation is 61% of the time over the residential Greenville Garden City area.

The NIA appropriately accounts for the proximity of the runway and incorporates standard aviation practices into its noise modelling, ensuring an accurate representation of operational impacts. The assessment also



Figure 3-1. Ambient Noise Monitoring Locations

Figure 4.1: Noise monitoring positions show no measurements in the key residential area under the flight path. Labels and key are not shown correctly

Page 3-6

The noise monitoring in Fisantekraal was done on the 2022 Easter weekend, with MP04 on top of a local residence. The report mentions that the Sunday was notably loud but makes no mention of the weekend being Easter weekend. It does not mention that it might have been an unusual scenario of Easter Sunday festivities (17 April 2022). The whole weekend was quite possibly unusual noise monitoring conditions. This weekend should have been avoided for “typical” noise level measurements. If the survey had to be done on this weekend, then the reason(s) for this should be stated and the uncertainty of the data should be reported.

Page 4-1

Construction noise is likely not a noise impact for the development. Construction noise is limited to specific hours though there is not a local noise limit for construction noise.

BS 5228-1 (1984) is stated as used. Note that BS 5228-1:2009+A1:2014 is the current version of the standard.

considers prevailing wind conditions and their influence on flight patterns, integrating these variables into the noise contour analysis to provide a realistic evaluation of potential noise impacts on Greenville and surrounding areas. This percentage was taken into account in the resulting noise levels.

“Page 4-24

The assessment shows the day-night level LRdn with contours starting at 55 dBA and not at 50 dBA. The district noise level in SANS 10103 is LRdn 50 dBA for a suburban area with little road traffic. Why is the 50– 55 dBA area not shown, since this is an area that exceeds the zone noise limits in SANS 10103. ...”

The decision to start contours at 55 dBA aligns with regulatory thresholds and maintains consistency with SANS 10103. Including lower-level contours is unnecessary and would not significantly impact the findings, as the analysis primarily focuses on areas within the 55–65 dBA range.

“Page 4-25

As shown in Section 2, an N70 noise event is a noise level at least 20 dBA above the district daytime rating level. This meets the definition of a disturbing noise in the Western Cape Noise Control Regulations, 2013, and according to SANS 10103:2008 “Vigorous community or group action” can be expected. AS2021:2015 states that noise levels above 70 dBA are likely to “interfere with conversation”. This is clearly a disruptive noise event. Figure 4-14 of the report (extract shown in Figure 4.3) shows that there are large areas in the Greenville Garden City residential area where more than 50 of these disruptive events are expected every single day. This is a severe impact on a residential area including education facilities and places of worship.”

As indicated in the Section 2 response, the reviewer misrepresents the intention of the SANS 10103 when he compares the N70 events, which refers to the number of the events that momentarily the L_{Amax} will reach in a location, with the L_{Req} guidelines at the same location.

The assessment acknowledges educational facilities and places of worship as sensitive receptors. While N70 events indicate potential noise impacts, the broader analysis provided by the NIA demonstrates that these impacts are managed through operational measures and strategic planning. Additionally,

Page 4-4

A “typical busy day” is presented as the very round number of 100+100+101=301 operations. This is in stark contrast to the reports noise survey levels and observations of the site “the main noise sources are the limited light aircraft flights”. The split in aircraft identifies that the vast majority of landing and taking off operations (157 of 200) will specifically be Cessna 172R aircraft. Is this a true reflection of nearby airfields and the types of aircraft used?

Page 4-7

The assessment attempts to compare the fully operational airport activities to the imagined operational levels of the current derelict airfield by comparing the number of operations. By stating that the fully operational airport “peak general aviation traffic under Scenario 3 will not exceed the current maximum operational capacity of Scenario 1” the assessment incredibly misleadingly implies that the noise from a Cessna is the same as the noise from a Boeing 777. In reality, the actual difference between Scenario 1 and Scenario 3 is an increase from zero large aircraft operations to 52 large aircraft operations per day.

The air traffic in the opening year will depend on several factors, including the phased construction and rollout of general aviation hangar facilities, which are yet to be finalized. Initially, a rapid increase in general aviation traffic is anticipated as development aligns with market demand. This growth is expected to continue over time, eventually reaching the maximum traffic levels outlined in Scenario 3. However, the peak general aviation traffic under Scenario 3 will not exceed the current maximum operational capacity of Scenario 1, the No-Go Alternative.

The paragraph following this one (included below) is simply untrue and is disproved by the assessment. Noise levels from the “general aviation operations” will specifically NOT “always be lower than those with the existing operations at full capacity”. Figure 4-8 shows predicted noise levels for the supposed Scenario 1, while Figure 4-13 shows noise levels for the operational airport. Extracts are included in Figure 4.2 of this report, clearly showing that this claim is materially false.

As such, at any given moment in time after the opening year of the new runway, the noise levels due to the general aviation operations will always be lower than those with the existing operations at full capacity.

noise mitigation strategies, which includes sound insulation, operational restrictions during sensitive hours, and community engagement programs, are integral to minimizing and addressing these impacts effectively.

“Page 5-31

The recommendation for noise control measures is not according to the methods in the Western Cape Noise Control Regulations, 2013 and is therefore rejected. As set out in Section 2, Regulation 4 states that clear mitigation measures must be included in a noise management plan “before the application is decided”. The report attempts to recommend that an investigation “should be initiated before the full capacity of the new runway is reached”.

The claim that the recommendations for noise control measures in the Noise Impact Assessment (NIA) are inconsistent with the Noise Regulations and should be outright rejected misrepresents the intent and methodology of the NIA, as well as the flexibility provided within the regulatory framework.

Regulation 4 requires a noise management plan with clear mitigation measures to be submitted prior to decision-making. The NIA meets this requirement by offering a detailed framework for managing noise impacts, which includes identifying sensitive receptors, outlining operational controls, and recommending phased noise monitoring and management strategies. The suggestion to initiate further investigations as the runway approaches full capacity reflects an adaptive management approach endorsed by NEMA, ensuring that mitigation measures remain proportional to actual operational impacts rather than theoretical projections.

The recommendation for additional investigations as the runway reaches full capacity is not "piecemeal" but rather a pragmatic and evidence-based approach to environmental management. Section 24 of the Constitution and NEMA emphasize sustainable development and the principle of adaptive management, which involves ongoing monitoring and adjustments to mitigation measures as new information becomes available. This is particularly crucial in aviation, where noise impacts can vary significantly due to changes in aircraft technology, fleet composition, and operational patterns over time.



Figure 4.2: Scenario 1 noise levels (left) are clearly lower than Scenario 3 noise levels (right)

Page 4-8

Table 4-8 shows that the number of large aircraft is expected to be 52 per day. Note that the noisier Airbus A380—specifically advertised in the press as an aircraft to be catered for by the longer runway—is not included in this list. The Airbus A350 is also not included in the list, even though it is used in press releases regarding current aircraft landing at CPT.

Table 4-8 New Runway System at Full Utilisation (Scenario 3)

Aircraft ID	Aircraft Model	Full Capacity Operations			
		Runway 01-19			
		Arr.	Circ.	Dep.	Total
A330-3	Airbus A330-300 Series	1	0	1	2
B737-3	Boeing 737-300 Series	2	0	2	4
B737-4	Boeing 737-400 Series	1	0	0	1
B737-8	Boeing 737-800 Series	13	0	14	27
B777-2ER	Boeing 777-200-ER	9	0	9	18
CL601	Bombardier Challenger 601	1	0	1	2
CNA172	CESSNA 172R	27	0	22	49
DHC6-3	DeHavilland DHC-6-300 Twin Otter	12	0	12	24
DHC8Q-4	Bombardier de Havilland Dash 8 Q400	2	0	2	4
EMB120	Embraer EMB120 Brasilia	4	0	4	8
ERJ145	Embraer ERJ145	16	0	16	32
GULF4-SP	Gulfstream IV-SP	8	0	8	16
PA28	PIPER WARRIOR PA-28-161	0	21	0	21
Total (24-hour)		96	21	91	208

Page 4-11

The prevailing southeast wind means the noisier take-off operation is 61% of the time over the residential Greenville Garden City area.

Implementing extensive mitigation measures prematurely, before the airport operates at or near full capacity, could lead to unnecessary costs and inefficiencies. Incremental assessments and adjustments ensure that noise management remains both effective and economically viable, adhering to the principles of proportionality and reasonableness that are central to sound environmental governance.

Far from undermining sound environmental management, incremental and phased assessments allow for a more accurate and responsive approach to environmental impacts. This aligns with NEMA’s goal of fostering an integrated and dynamic approach to environmental decision-making. The NIA provides a robust baseline assessment and a clear pathway for iterative management, ensuring compliance with both current regulatory requirements and future operational realities.

The NIA does not propose delaying mitigation but rather recommends a phased implementation plan that continuously aligns with actual noise levels and community needs. Additionally, commitments to ongoing stakeholder engagement, monitoring, and periodic reviews are embedded in the proposed noise management framework, ensuring accountability and compliance with constitutional and regulatory obligations.

In conclusion, the recommendations in the NIA are fully consistent with the Noise Regulations, NEMA, and the Constitution. They reflect a thoughtful, evidence-based, and sustainable approach to noise management, ensuring that mitigation measures are both effective and adaptive to the evolving operational context of the airport. Rejecting this approach in favour of rigid, premature measures would undermine the principles of sound environmental governance and sustainable development.

The assessment of the impact significance as “High,” with mitigation reducing it to “Medium,” reflects a realistic understanding of the challenges posed by the project. The Garden Cities comment misrepresents this as an oversight, when in fact, it demonstrates a thorough and transparent evaluation process.

“Notwithstanding all comments in this review regarding the aircraft types modelled and the times of flights, the assessment still rates the impact significance as “HIGH” with “High” confidence (Table 5 4). The assessment claims that with mitigation the impact significance is reduced to “MEDIUM”

Page 4-24

The assessment shows the day-night level LRdn with contours starting at 55 dBA and not at 50 dBA. The district noise level in SANS 10103 is LRdn 50 dBA for a suburban area with little road traffic. Why is the 50 55 dBA area not shown, since this is an area that exceeds the zone noise limits in SANS 10103.

Figure 4-13 shows a large area in the Greenville residential area will exceed the 50 dBA rating level by up to 10 dBA and an area that exceeds the rating level by over 10 dBA.

Page 4-25

As shown in Section 2, an N70 noise event is a noise level at least 20 dBA above the district daytime rating level. This meets the definition of a disturbing noise in the Western Cape Noise Control Regulations, 2013, and according to SANS 10103:2008 “Vigorous community or group action” can be expected. AS2021:2015 states that noise levels above 70 dBA are likely to “interfere with conversation”. This is clearly a disruptive noise event.

Figure 4-14 of the report (extract shown in Figure 4.3) shows that there are large areas in the Greenville Garden City residential area where more than 50 of these disruptive events are expected every single day. This is a severe impact on a residential area including education facilities and places of worship.

with “High” confidence. The so-called mitigation measures will be addressed in turn.”

The location of the CWA airport offers several opportunities to mitigate aircraft noise impacts. According to international best practices, these include:

- Operational Procedures: Noise abatement procedures (NAPs) consist of guidelines and standard operational procedures designed to reduce noise near airports. These typically include specified flight paths, altitude requirements, and operational settings that pilots should follow during take-off and landing.
- Noise Contour Mapping: By using noise contour maps, areas with significant noise exposure can be identified, helping guide decisions on future residential development.
- Land Use Planning: Zoning regulations that restrict sensitive land uses can help prevent future noise-related issues.
- Sound Insulation Measures: For existing sensitive receptors near airports, investing in soundproofing infrastructure can help reduce indoor noise levels.

“Mitigation measures, pages 5-31 to 5-33”

The NIA’s mitigation measures are neither unproven nor speculative; they align with the ICAO Balanced Approach to noise management, which focuses on reducing noise at the source, implementing land-use planning and management, optimizing noise abatement operational procedures, and considering operating restrictions when necessary. While some measures require further detailed planning and consultation with relevant authorities, this is standard practice for large-scale infrastructure projects. The reduction in impact significance from “High” to “Medium” reflects the cumulative effect of these measures, following established impact assessment methodologies. The critique overlooks the practical application of these strategies and their role in balancing operational efficiency with environmental and community considerations.

The comment on the Noise Impact Assessment (NIA) and the proposed mitigation measures misinterprets the intent and scope of these strategies. Effective noise management relies on a combination of operational, regulatory, and infrastructural measures to minimize impacts as much as

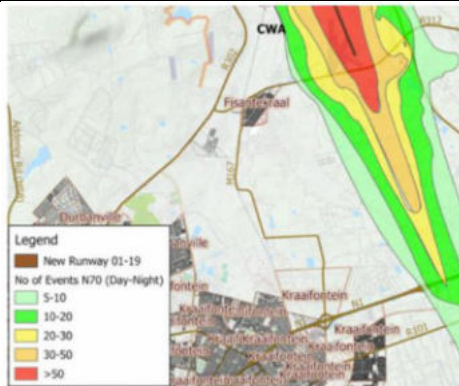


Figure 4.3: Number of events above 70 dBA is above 50 per day for a large area of the Greenville City residential area

Page 5-31

The recommendation for noise control measures is not according to the methods in the Western Cape Noise Control Regulations, 2013 and is therefore rejected. As set out in Section 2, Regulation 4 states that clear mitigation measures must be included in a noise management plan “before the application is decided”.

The report attempts to recommend that an investigation “should be initiated before the full capacity of the new runway is reached”.

The investigation of noise abatement operational procedures should be initiated before the full capacity of the new runway is reached, taking into account the recommended noise monitoring around the airport and noise modelling of the applicable mitigation measures.

Notwithstanding all comments in this review regarding the aircraft types modelled and the times of flights, the assessment still rates the impact significance as “HIGH” with “High” confidence (Table 5-4). The assessment claims that with mitigation the impact significance is reduced to “MEDIUM” with “High” confidence. The so-called mitigation measures will be addressed in turn.

feasibly possible, recognizing that the complete elimination of airport noise is not achievable. The NIA applies a structured, internationally recognized approach to noise mitigation, ensuring that solutions are both practical and proportionate to the scale of operations while addressing community concerns.

***“Mitigation 1: the assessment admits that the airport is not compatible with residential and educational uses “incompatible land use (such as houses and schools)”:*”**

The recommendation to promote airport-compatible land-use planning is a proactive measure that aligns with the ICAO Balanced Approach, specifically the principle of land-use planning and management to minimize long-term noise conflicts. While Greenville already exists as a residential and educational area—phases/parcels 1 and 2 located up to 4 km west of the CWA realigned runway 01/19—this does not make the proposed mitigation irrelevant. Future planning efforts remain essential to prevent the introduction of additional noise-sensitive developments in closer proximity to the airport, where conflicts could be exacerbated.

The comment misrepresents this mitigation as an attempt to retroactively relocate Greenville, which is not its intent. Instead, it serves as a strategic policy recommendation aimed at long-term urban and zoning planning to ensure that future land uses remain compatible with airport operations. This approach is consistent with international best practices in sustainable airport development, balancing the needs of aviation with environmental and community considerations.

“Mitigation 2: no dB reduction figure is given for this vague suggestion of a tax on airlines for noise”

This measure is neither untested nor insufficient. It aligns with ICAO best practices and has proven effectiveness in international aviation. The next step involves refining the implementation plan through stakeholder engagement, ensuring that the measure is both practical and impactful, contributing to long-term noise reduction and sustainable airport operations.

While the Noise Impact Assessment (NIA) does not specify exact dB reductions or precise fee structures, this does not diminish its validity. Instead, it reflects

Table 5-4. Operation Noise Impact Ratings: Scenario 3 (New Runway 01/19 at Full Capacity)

Noise	Extent	Intensity	Duration	Consequence	Probability	Significance	Status	Confidence
Without mitigation	Local 1	High 3	Long-term 3	High 7	Probable	HIGH	- ve	High
Noise	Extent	Intensity	Duration	Consequence	Probability	Significance	Status	Confidence
With mitigation	Local 1	Medium 2	Long-term 3	Medium 6	Probable	MEDIUM	- ve	High

Mitigation measures, pages 5-31 to 5-33

Mitigation 1: the assessment admits that the airport is not compatible with residential and educational uses “incompatible land use (such as houses and schools)”:

- Encourage airport compatible land-use planning via:
 - establishing compatible land use (such as industrial and commercial) to be located around airport facilities.
 - directing incompatible land use (such as houses and schools) away from the airport environs and the runway alignments;

Mitigation 2: no dB reduction figure is given for this vague suggestion of a tax on airlines for noise

- Provide incentives for airlines to obtain aircraft with the latest available noise reduction technology, through for example noise-related landing charges.

Mitigation 3: Any changes to the flight paths must be approved by the relevant authority and must be modelled to assess whether this yields any meaningful reduction in noise levels at the affected areas.

- Consider the use of specific take-off or approach procedures (such as Continuous Descent Operations, or steeper landing trajectories) to minimise and optimize the distribution of noise on the ground.

Mitigation 4: Any changes to the flight paths must be approved by the relevant authority and must be modelled to assess whether this yields any meaningful reduction in noise levels at the affected areas.

- Use noise preferential routes to assist aircraft in avoiding noise-sensitive areas, such as Klipheuwel, on departure and arrival, and the use of turns to direct aircraft away from noise-sensitive areas.

Mitigation 5: Feasibility of the mitigation not assessed “may be feasible”. An increase in glide-path angle only helps on approach, not on the 61% use

the early-stage nature of the recommendation, which requires further stakeholder consultation and refinement during implementation.

Noise-related landing charges are a globally recognized tool within the ICAO Balanced Approach, specifically under the category of operational noise management and economic incentives. Many major airports worldwide, including those in Europe, North America, and Asia, have successfully implemented differentiated landing fees to encourage airlines to operate quieter aircraft. These schemes have demonstrated measurable success in fleet modernization and noise reduction, reinforcing their feasibility as a mitigation strategy.

While the NIA does not outline a specific financial model, this is standard practice, as such policies require collaboration with airlines, regulatory bodies, and airport operators to ensure effectiveness and economic viability. The absence of immediate technical details does not undermine the recommendation but rather reflects the progressive nature of policy development, where conceptual strategies evolve into tailored, context-specific solutions.

The mitigation hierarchy has been carefully followed:

- Avoidance and minimization through optimized flight procedures and airspace design.
- Operational incentives such as noise-related landing charges to drive behavioural change.
- Technological improvements through the encouragement of quieter aircraft.

Noise-related landing charges are not standalone measures but part of a comprehensive noise management framework, complementing other operational and infrastructural strategies outlined in the NIA.

“Mitigation 3: Any changes to the flight paths must be approved by the relevant authority and must be modelled to assess whether this yields any meaningful reduction in noise levels at the affected areas.”

The recommendation to consider specific take-off or approach procedures aligns with the ICAO Balanced Approach to noise management, specifically within the category of noise abatement operational procedures. These

case of take-off over the residential area. An increase of 0.2^o is equivalent to an increase of 11 metres from 157 metres to 168 metres above ground level at 3 kilometres from landing. This is a negligible increase in distance.

- Consider approaches at slightly steeper angles. A small increase in the glide-path angle to 3.2°, rather than the standard 3.0°, may be feasible and offer scope for noise reduction.

Mitigation 6: Not a noise mitigation method. Telling residents when they will have a “HIGH” noise impact is not mitigation.

- Establish and maintain effective communication channels with the affected public and provide real-time information on incoming and outgoing flights and their evolving noise footprints.

Mitigation 7: The assessment states that there will not be night-time operations. Voluntary mitigation by the airport is not acceptable.

- Consider noise-related operating restrictions for night-time. These can be imposed on a voluntary basis by the airport, or by the Government.

Mitigation 8: Is the project proposing to pay to improve the sound insulation of buildings affected by the operational noise levels? Considering the assessment has assumed openable windows for ventilation, any improvements to the buildings would have to include alternative ventilation options (forced/mechanical ventilation), which is likely not feasible for residential and educational facilities.

In conjunction with the above-mentioned noise abatement measures, the introduction of ‘passive’ mitigation measures, such as noise insulation on existing residential dwellings and noise-sensitive buildings (schools, hospitals, etc.) may be considered.

An extensive noise monitoring and reporting scheme is proposed. This offers zero mitigation for the affected residential area. It must be noted that the assessment does not consider the primary mitigation method, which is to move the runway further away from the “incompatible land use” areas.

5.0 Conclusions and Recommendations

The reviewed noise impact assessment has numerous errors and omissions:

- Basic acoustic calculation methods are incorrect (Table 3-3)
- No noise monitoring has been done (or reported) in the primary study zone under the proposed flight path in the Greenville City residential

strategies are widely recognized as effective in minimizing noise exposure for surrounding communities while maintaining safe and efficient airport operations.

The Noise Impact Assessment (NIA) acknowledges that any modifications to flight paths, departure procedures, or approach profiles require regulatory approval, detailed airspace and noise modelling, and consultation with aviation stakeholders. This measure is not speculative but represents a proactive, evidence-based approach that explores opportunities for noise reduction through operational refinements.

While the precise noise benefits will be determined through further analysis, the inclusion of this measure within the NIA aligns with adaptive management principles. By continuously evaluating and refining operational strategies based on real-world data and stakeholder input, this approach ensures that noise mitigation remains dynamic and responsive to evolving aviation and environmental conditions.

In conclusion, this recommendation reflects a responsible and internationally recognized strategy for noise management. It underscores the commitment to ongoing assessment, collaboration with aviation authorities, and sustainable noise mitigation practices, ensuring that operational adjustments contribute effectively to reducing community noise exposure.

“Mitigation 4: Any changes to the flight paths must be approved by the relevant authority and must be modelled to assess whether this yields any meaningful reduction in noise levels at the affected areas.”

The implementation of noise preferential routes (NPRs) is a well-established noise mitigation strategy within the ICAO Balanced Approach, falling under noise abatement operational procedures. NPRs are widely used at airports worldwide to minimize noise exposure over noise-sensitive areas by directing aircraft along flight paths that reduce community impact while maintaining operational efficiency and safety.

The Noise Impact Assessment (NIA) appropriately identifies NPRs as a potential mitigation measure, recognizing that their implementation requires regulatory approval, detailed noise modelling, and coordination with aviation authorities. This does not diminish their validity but instead reflects the

area. Noise monitoring was done at a non-typical time (the 2022 Easter weekend) but this was not explicitly reported.

- The “No-Go” scenario imagines an airfield completely different to the current airfield, with significantly more flights, including the use of two runways that are currently unmarked and derelict, one of which has a go-kart track or similar on it.
- A meaningless scenario of the first year of operation is included for no clear reason. The assessment is for the full operation of the airport.
- For the fully operational scenario, no large aircraft such as the Airbus A380 are included in the noise model despite claims in press releases that the runway is specifically designed to cater for these aircraft.
 - The longer rolling distance of the A380 compared to the Boeing 737 means that the aircraft will be significantly lower when passing over the land to the south, increasing noise levels in the area.
- The assessment states that noise levels in the fully operational scenario will be lower than the imagined “No-Go” scenario, but then shows this statement to be false in its own noise contour plots.
 - The assessment also disingenuously compares the number of operations between scenarios, where in the “No-Go” scenario the operations are all light aircraft while in the fully operational scenario there are 52 new large aircraft operations per day.
- The procedure set out in the Western Cape Noise Control Regulations, 2013 is not followed as the assessment recommends a report investigating mitigations is started before the airport reaches full capacity. Regulation 4 states that all mitigation methods are to be submitted to the local authority before approval is granted.
- The assessment gives a list of unproven, untested, and unassessed vague noise mitigation methods. None of the mitigation methods is shown to give any noise reduction, and yet the noise impact rating’s significance is inexplicably reduced from HIGH to MEDIUM.

standard process for assessing and implementing flight procedure modifications.

y proposing NPRs, the NIA follows best practices in noise management, demonstrating a commitment to evaluating all feasible mitigation options. Further analysis and consultation will ensure that any route adjustments balance environmental concerns with aviation safety and operational requirements, in line with internationally recognized noise management principles.

“Mitigation 5: Feasibility of the mitigation not assessed “may be feasible”. An increase in glide-path angle only helps on approach, not on the 61% use case of take-off over the residential area. An increase of 0.2° is equivalent to an increase of 11 metres from 157 metres to 168 metres above ground level at 3 kilometres from landing. This is a negligible increase in distance.”

The consideration of steeper approach angles, such as increasing the glide path angle to 3.2 degrees, aligns with the ICAO Balanced Approach under noise abatement operational procedures. The maximum approach angle used internationally varies based on airport constraints, aircraft capabilities, and regulatory approvals. Some notable examples include:

- 3.2 - 3.5 degrees – Some airports implement slightly steeper approaches (e.g., London Heathrow’s 3.2-degree trial for noise reduction).
- 3.77 degrees – London City Airport (UK) enforces this due to its short runway and urban location.
- 4.5 degrees – Some Swiss airports, such as Lugano, use this angle due to terrain constraints.
- 5.5 degrees – London City Airport’s steeper approach for certain aircraft types.
- 6.65 degrees – Stockholm Bromma Airport (Sweden) has used this for noise reduction and safety.

While the critique downplays the effectiveness of this measure, it overlooks the cumulative benefits of even small altitude increases during approach. Steeper descent angles can lead to measurable noise reductions for

Notwithstanding the queries over the aircraft used in the noise model, the assessment still highlights the following significant impacts on the Greenville Garden City residential zone:

- A large area is exposed to average noise levels above the district rating level with no proposed effective mitigation measures to reduce the noise levels to comply with the district rating level.
- A large area is exposed to noise events above 70 dBA over 50 times per day. This noise level has a severe impact on the suburban area and is not permitted by local regulations: - 70 dBA is 20 dBA above the daytime district rating level. SANS 10103 states “Vigorous community or group action” can be expected for noise levels 15 dBA above the rating level.
 - 70 dBA is 13 dBA above the noise limit for a disturbing noise as defined by the Western Cape Noise Control Regulations, 2013. The regulations state that “A person may not allow a disturbing noise to be caused”.
 - Australian Standard AS2021-2015 states that 70 dBA will likely “interfere with conversation”. This is a significant negative impact for residents and for learners in the schools.
- The assessment concludes that residential and school use is “incompatible” with the proposed airport land use.

It is clear that the proposed airport will have a HIGH, negative impact on the existing and future suburban land uses to the south, against which no realistic or meaningful mitigation has been proposed or is likely available to be imposed.

Based on the findings of the assessment, it is clear that the only feasible mitigation measure is to move the runway a distance to the north so that the significant noise impacts are largely located on the airport landholding.

The assessment therefore does not adequately assess the impact of noise from the proposed development on the Greenville Garden City property. The application must be rejected on grounds of noise impact on the Greenville Garden City.

communities beneath the flight path by increasing the distance between aircraft and the ground, thereby reducing noise exposure.

Although this measure does not directly address take-off noise, it remains a recognized and effective approach for mitigating approach noise impacts, particularly in noise-sensitive areas near airports. The feasibility of implementing a steeper glide path requires detailed consultation with aviation authorities, aircraft operators, and air traffic controllers, as well as safety and operational assessments—a standard process in aviation noise management.

By proposing this adjustment, the NIA demonstrates a commitment to exploring all practical noise reduction strategies in alignment with global best practices. Further evaluation will ensure that any procedural changes are technically and operationally viable while effectively contributing to overall noise mitigation efforts.

“Mitigation 6: Not a noise mitigation method. Telling residents when they will have a “HIGH” noise impact is not mitigation”

Implementing effective community engagement and communication channels is a key component of the ICAO Balanced Approach to noise management. While it does not directly reduce noise levels, it plays a crucial role in building transparency, trust, and public confidence in noise mitigation efforts. Proactive communication ensures that affected communities are informed, engaged, and provided with clear explanations of airport operations, noise impacts, and mitigation measures.

This approach aligns with international best practices, where stakeholder engagement is recognized as essential for effective noise management. It complements other mitigation strategies by addressing concerns, managing expectations, and fostering collaboration between the airport, regulatory authorities, and local communities.

“Mitigation 7: The assessment states that there will not be night-time operations. Voluntary mitigation by the airport is not acceptable”

The consideration of noise-related operating restrictions at night aligns with the ICAO Balanced Approach, which prioritizes reducing noise at the source, land-use planning, noise abatement operational procedures, and operating restrictions as a last resort. Many airports worldwide implement such

			<p>restrictions—whether voluntary or government-mandated—to mitigate noise impacts during sensitive nighttime hours.</p> <p>While voluntary restrictions may not provide absolute guarantees, they can still effectively limit nighttime disturbances, especially when combined with other operational noise abatement measures. Additionally, government-imposed restrictions remain a viable option should further analysis and stakeholder engagement indicate their necessity. The NIA's consideration of this measure reflects a responsible, phased approach to noise management, ensuring that restrictions are implemented proportionally and in accordance with international best practices.</p> <p>Several airports around the world have implemented voluntary noise mitigation measures, including nighttime curfews, preferential flight paths, and operational restrictions designed to reduce noise impacts, particularly during sensitive hours. These measures often rely on airlines' willingness to participate, with the goal of minimizing disturbances in surrounding communities without government imposed regulations. Some examples include:</p> <ul style="list-style-type: none"> • London Heathrow Airport (LHR), UK <p>Voluntary Night Flight Restrictions: Heathrow Airport has implemented voluntary agreements with airlines to limit nighttime operations. Airlines agree to operate quieter aircraft and reduce flights during late hours, especially between 23:30 and 06:00. Incentives for Quieter Aircraft: Airlines that operate quieter, more modern aircraft during night hours receive operational incentives, including lower landing fees.</p> • Los Angeles International Airport (LAX), USA <p>Voluntary Nighttime Curfew: LAX has a voluntary curfew in place between 00:00 and 06:30 for quieter aircraft. Airlines are encouraged to avoid operating noisier aircraft during these hours, with those complying benefiting from reduced landing fees and incentives. Preferred Flight Paths: Voluntary routing encourages airlines to use flight paths that avoid residential areas whenever possible, especially during nighttime operations.</p>
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			<ul style="list-style-type: none"> • Sydney Kingsford Smith Airport (SYD), Australia Voluntary Night Restrictions: Many airlines voluntarily agree to limit their nighttime operations, especially for aircraft types with higher noise levels, between 23:00 and 06:00. • Munich Airport (MUC), Germany Voluntary Night Restrictions: Munich operates a voluntary nighttime restriction scheme between 23:00 and 06:00, with airlines encouraged to avoid using noisier aircraft during these hours. Incentives for Quieter Aircraft: Airlines participating in voluntary agreements to fly quieter aircraft during nighttime are often rewarded with reduced landing fees or preferred scheduling. • Amsterdam Schiphol Airport (AMS), Netherlands Voluntary Night Flight Limits: Schiphol has worked with airlines to limit night flights, particularly between 00:00 and 06:00. The airport provides incentives to airlines operating quieter aircraft during this time. Noise-Reduced Flight Paths: Airlines are encouraged to use flight paths that minimize noise impact on surrounding residential areas, particularly at night. <p><i>“Mitigation 8: Is the project proposing to pay to improve the sound insulation of buildings affected by the operational noise levels?”</i></p> <p>Passive noise mitigation measures, such as sound insulation for existing affected buildings, are internationally recognized as effective tools for managing operational noise impacts. The critique's concern about feasibility overlooks the proven success of these measures at airports worldwide. While some buildings may require ventilation improvements to maintain indoor air quality, these measures can still significantly reduce noise intrusion for residents and sensitive facilities like schools. The project's commitment to funding these improvements, if needed, aligns with a proactive and responsible approach to managing noise impacts in line with best practices.</p> <p><i>“An extensive noise monitoring and reporting scheme is proposed. This offers zero mitigation for the affected residential area.”</i></p>
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			<p>The comment regarding the proposed extensive noise monitoring and reporting scheme offering "zero mitigation" for the affected residential area does not fully consider the principles of the ICAO Balanced Approach to noise management. The approach promotes a combination of measures to manage and reduce aviation noise. One of them entails Monitoring and Communication (e.g., monitoring, reporting, and public engagement).</p> <p>While the noise monitoring and reporting scheme itself does not directly reduce noise, it serves a critical role in the monitoring and communication element of the ICAO Balanced Approach. Its importance lies in providing data to track noise impacts, identify areas where mitigation measures are needed, and inform ongoing noise management strategies. The scheme's role in providing transparency, fostering community trust, and enabling timely responses to emerging noise concerns is essential for effective long-term noise management.</p> <p>The comment overlooks that noise monitoring is a key step in the adaptive management process. Without a robust monitoring system, it would be difficult to assess the effectiveness of noise reduction measures or to identify areas where additional mitigation is required. In this sense, the monitoring scheme acts as the foundation for future, more targeted interventions and refinements to noise mitigation.</p> <p>While noise monitoring by itself does not immediately reduce noise levels, it contributes significantly to the broader management framework. This aligns with the Balanced Approach where monitoring, reporting, and stakeholder engagement are necessary to ensure that noise impacts are continually assessed, understood, and appropriately addressed.</p> <p><i>"It must be noted that the assessment does not consider the primary mitigation method, which is to move the runway further away from the "incompatible land use" areas."</i></p> <p>Relocating a runway would require extensive evaluation of factors such as airspace management, safety, environmental considerations, local geography, and economic feasibility. A relocation would be part of a comprehensive strategy where it is seen as a last-resort option after considering the effectiveness and practicality of other, less disruptive measures.</p>
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			<p>In summary, while a noise impact assessment study could propose runway relocation, this would typically be done after exploring other mitigation strategies, and it would need to be supported by detailed technical, regulatory, and environmental analysis to justify its feasibility.</p> <p>In the context of ICAO's Balanced Approach to noise management, the relocation of a runway would likely be considered only after thoroughly assessing the feasibility of other mitigation measures.</p> <p>Relocating a runway is generally considered an extreme measure and would typically be proposed only if other noise mitigation strategies (such as operational adjustments, noise barriers, or land-use planning changes) are insufficient to manage the noise impacts effectively.</p> <p><i>“5.0 Conclusions and Recommendations</i></p> <p><i>The reviewed noise impact assessment has numerous errors and omissions:</i></p> <ul style="list-style-type: none"> <i>• Basic acoustic calculation methods are incorrect (Table 3-3)”</i> <p>The term “overall” used in the NIA does not imply a logarithmic average of intermittent measurements but rather represents the applicable district level. The reviewer's comment on the logarithmic calculation of noise levels reflects a misunderstanding of the methodology. While averaging noise data using arithmetic means may seem incorrect, it is commonly used for specific reporting purposes, particularly when noise levels are very similar. The term “overall” does not imply a logarithmic average of intermittent measurements but rather represents the applicable district level.</p> <p>Additionally, this “overall” level can be considered a worst-case scenario, as it results in a lower value than the logarithmic average, thereby establishing a stricter noise baseline.</p> <p><i>“• No noise monitoring has been done (or reported) in the primary study zone under the proposed flight path in the Greenville City residential area. Noise monitoring was done at a non-typical time (the 2022 Easter weekend) but this was not explicitly reported.”</i></p> <p>The NIA accounts for noise level variability and adjusts modelling parameters to reflect long-term averages rather than isolated events. The selection of</p>
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			<p>specific survey dates is a practical consideration and does not compromise the overall conclusions of the assessment.</p> <p>Two additional days were utilised, i.e. 28th and 29th of April 2022. In addition, for location MP04 (Fisantekraal residential area), the monitoring took place from April 14 to April 22, 2022, spanning more than seven days, including periods unaffected by loud music and increased human activity. The report states: “It can be seen from Figure 4-2 that the daytime noise levels were maintained between 55 dB(A) and 60 dB(A), with some exceptions, primarily on Sunday, April 17, due to increased human activities and loud music.” This explicitly acknowledges that noise levels on April 17 were higher than on other monitoring days.</p> <p>The conclusion that noise levels in the area (excluding those recorded on April 17) exceeded the SANS guideline levels for Urban Residential Districts remains valid.</p> <p>“• The “No-Go” scenario imagines an airfield completely different to the current airfield, with significantly more flights, including the use of two runways that are currently unmarked and derelict, one of which has a go-kart track or similar on it.”</p> <p>The No-Go scenario is designed to assess environmental impacts based on the assumption that all existing infrastructure, including the four runways, could operate at their full potential. This is a standard approach in Environmental Impact Assessments (EIAs) to establish a conservative baseline for comparison.</p> <p>Furthermore, the CWA has the authority to resurface and repaint the unused runways and apply to the South African Civil Aviation Authority (SACAA) for their reinstatement for aviation use without requiring public involvement. Since all four runways have been in place and operational at various times since 1943, they remain part of the airport’s infrastructure and could be brought back into use, reinforcing the validity of assessing full operational capacity.</p> <p>While it is true that only two runways are currently in use for aviation operations, the inclusion of all four runways accounts for their theoretical capacity, ensuring that baseline impacts are not underestimated. This</p>
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			<p>methodology aligns with regulatory expectations and industry best practices, which prioritize potential capacity over current utilization.</p> <p>A fundamental best practice in aircraft noise impact assessments is to compare scenarios based on "worst-case" operational conditions for each authorized or proposed phase. The No-Go alternative represents the maximum realistic utilization of the current CWA runway system. This worst-case scenario was selected to provide a direct comparison with the worst-case, or maximum, utilization of the new CWA runway, ensuring a comprehensive assessment of potential noise impacts.</p> <p><i>“• A meaningless scenario of the first year of operation is included for no clear reason. The assessment is for the full operation of the airport.”</i></p> <p>The assertion that including the first-year scenario in the Noise Impact Assessment (NIA) is meaningless misrepresents the purpose and standard methodology of noise modelling.</p> <p>Phased development is a core aspect of the proposed Cape Winelands Airport (CWA) project, with operations expanding incrementally over time. Incorporating the first-year operational scenario aligns with industry best practices, enabling Interested and Affected Parties (I&APs) to understand the gradual progression of impacts rather than assuming an immediate transition to full-scale operations.</p> <p>The first-year scenario is particularly valuable as it establishes a baseline for noise impacts during initial operations, serving as a crucial reference point for comparing early-phase and full-scale effects. Additionally, it informs the phased development of mitigation strategies, ensuring that noise management evolves alongside airport operations. The inclusion of this scenario follows standard Environmental Impact Assessment (EIA) practices, emphasizing responsible and realistic impact evaluation rather than misleading stakeholders.</p> <p><i>“• For the fully operational scenario, no large aircraft such as the Airbus A380 are included in the noise model despite claims in press releases that the runway is specifically designed to cater for these aircraft.”</i></p>
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			<p><i>- The longer rolling distance of the A380 compared to the Boeing 737 means that the aircraft will be significantly lower when passing over the land to the south, increasing noise levels in the area."</i></p> <p>Not including larger aircraft such as the Airbus A380 or A350 is not an omission, as these aircraft are exceptions rather than the norm for operations at CWA. The A380 adheres to stricter noise regulations and generates lower noise levels during take-off and landing compared to the 777.</p> <p>The number of flights as well as the aircraft types for the typical busy day, which serves as the worst case scenario for each of the modelled scenarios, were identified in the detailed study: "NACO, ATNS, NLR, 2023. Development of an Airspace CONOPS for the Cape Winelands Airport. 02 November 2023."</p> <p>The modelling focuses on fleet mixes that are expected to dominate operations, providing a robust and relevant assessment of the anticipated impacts.</p> <p><i>"• The assessment states that noise levels in the fully operational scenario will be lower than the imagined "No-Go" scenario, but then shows this statement to be false in its own noise contour plots. - The assessment also disingenuously compares the number of operations between scenarios, where in the "No-Go" scenario the operations are all light aircraft while in the fully operational scenario there are 52 new large aircraft operations per day."</i></p> <p>The reviewer comment conflates the general aviation operations modelled in Scenario 1 with the expanded operations in Scenario 3.</p> <p>The comment misinterprets the NIA's comparison between Scenario 1 (current maximum operational capacity) and Scenario 3 (fully operational CWA). The statement that general aviation noise levels in Scenario 3 will be lower than those in Scenario 1 refers specifically to the relative contribution of general aviation operations, not the cumulative noise impacts of all operations. The NIA clearly accounts for the introduction of larger commercial aircraft and their associated noise levels in Scenario 3.</p> <p>The noise contour maps included further illustrate the modelled outcomes for each scenario. The maps support the conclusion that noise levels under</p>
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			<p>Scenario 3 will exceed those in Scenario 1, particularly due to the introduction of larger aircraft.</p> <p><i>“• The procedure set out in the Western Cape Noise Control Regulations, 2013 is not followed as the assessment recommends a report investigating mitigations is started before the airport reaches full capacity. Regulation 4 states that all mitigation methods are to be submitted to the local authority before approval is granted.”</i></p> <p>The assertion that the noise control measures recommended in the Noise Impact Assessment (NIA) are inconsistent with the Noise Regulations and should be outright rejected misinterprets the purpose and approach of the NIA, as well as the flexibility allowed within the regulatory framework.</p> <p>Regulation 4 requires a noise management plan with clear mitigation measures to be submitted prior to decision-making. The NIA meets this requirement by offering a detailed framework for managing noise impacts, which includes identifying sensitive receptors, outlining operational controls, and recommending phased noise monitoring and management strategies. The suggestion to initiate further investigations as the runway approaches full capacity reflects an adaptive management approach endorsed by NEMA, ensuring that mitigation measures remain proportional to actual operational impacts rather than theoretical projections.</p> <p>Section 24 of the Constitution and NEMA emphasize sustainable development and the principle of adaptive management, which involves ongoing monitoring and adjustments to mitigation measures as new information becomes available. This is particularly crucial in aviation, where noise impacts can vary significantly due to changes in aircraft technology, fleet composition, and operational patterns over time.</p> <p>Implementing extensive mitigation measures prematurely, before the airport operates at or near full capacity, could lead to unnecessary costs and inefficiencies. Incremental assessments and adjustments ensure that noise management remains both effective and economically viable, adhering to the principles of proportionality and reasonableness that are central to sound environmental governance.</p>
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			<p>The NIA does not advocate for delaying mitigation but instead recommends a phased implementation plan that aligns with actual noise levels and the evolving needs of the community. This approach is consistent with the principles of adaptive management, ensuring that noise mitigation strategies remain responsive to changing operational circumstances. Furthermore, the NIA incorporates commitments to ongoing stakeholder engagement, monitoring, and periodic reviews, ensuring transparency, accountability, and compliance with both regulatory and constitutional obligations.</p> <p>In conclusion, the recommendations in the NIA are fully aligned with the Noise Regulations, NEMA, and the Constitution. They represent a balanced, evidence-based, and sustainable approach to noise management, ensuring that mitigation measures are both effective and adaptable to the changing operational context of the airport. Rejecting this approach in favour of rigid, premature measures would undermine the principles of sound environmental governance and sustainable development.</p> <p><i>“• The assessment gives a list of unproven, untested, and unassessed vague noise mitigation methods. None of the mitigation methods is shown to give any noise reduction, and yet the noise impact rating’s significance is inexplicably reduced from HIGH to MEDIUM.”</i></p> <p>The NIA’s mitigation measures are neither unproven nor untested; they are fully aligned with the ICAO Balanced Approach to noise management, which emphasizes a comprehensive strategy that includes reducing noise at the source, implementing land-use planning and management, optimizing noise abatement operational procedures, and considering operating restrictions when necessary.</p> <p>These measures require further detailed planning and consultation with relevant authorities, which is a standard part of the process for large-scale infrastructure projects. The reduction in impact significance from “High” to “Medium” reflects the cumulative effect of these measures, consistent with established methodologies for impact assessment. The critique fails to acknowledge the practical implementation of these strategies and their role in balancing operational efficiency with environmental and community considerations.</p>
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			<p>The recommended mitigation measures are routinely applied at many of the world’s largest airports. These measures are often phased in over time and were not necessarily implemented from the outset of airport operations, reflecting a gradual and adaptive approach to managing noise impacts as operations and technologies evolve.</p> <p>There are several examples of a Phased Noise Mitigation:</p> <ul style="list-style-type: none"> • At Heathrow, the phased approach to noise mitigation has evolved over several decades. The airport initially focused on reducing noise at the source by encouraging airlines to use quieter aircraft, such as those complying with Chapter 3 (older standard) and then moving to Chapter 4 (quieter aircraft). <p>Heathrow's night curfew, initially set in place in the 1970s, was progressively tightened over time. The airport now restricts the number of aircraft movements during the night, particularly for noisier aircraft types, and aims for further reductions as part of long-term noise management.</p> <ul style="list-style-type: none"> • The Los Angeles International Airport (LAX) has implemented noise reduction measures in phases, starting with a gradual reduction in the number of nighttime flights and the introduction of noise-related landing fees. The phased implementation includes incentives for airlines to adopt quieter aircraft, followed by the introduction of noise abatement operational procedures (e.g., preferential flight routes and reduced noise power settings). • The Singapore Changi Airport implemented a phased approach to noise management by first incentivizing quieter aircraft through landing fees and gradually transitioning to stricter noise regulations as new technologies became available. The airport encouraged airlines to adopt quieter models like the Airbus A380, Boeing 787, and Boeing 777. <p><i>“• A large area is exposed to noise events above 70 dBA over 50 times per day. This noise level has a severe impact on the suburban area and is not permitted by local regulations: - 70 dBA is 20 dBA above the daytime district</i></p>
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			<p>rating level. SANS 10103 states “Vigorous community or group action” can be expected for noise levels 15 dBA above the rating level.”</p> <p>Comparing the L_{Amax} of 70 dBA to the SANS district-level LReq of 50 dBA is incorrect. The reviewer mistakenly equates L_{Amax}, which forms the basis of N70, with LReq, the metric referenced in the SANS Code.</p> <p>“- 70 dBA is 13 dBA above the noise limit for a disturbing noise as defined by the Western Cape Noise Control Regulations, 2013. The regulations state that “A person may not allow a disturbing noise to be caused”.”</p> <p>Similarly, as above, the comparison of the L_{Amax} of 70 dBA to the LReq guideline is incorrect.</p> <p>“- Australian Standard AS2021-2015 states that 70 dBA will likely “interfere with conversation”. This is a significant negative impact for residents and for learners in the schools.”</p> <p>This aligns with the report's recommendation that schools, unless equipped with specific noise mitigation measures, should be situated outside high impact zones, such as areas with a very high frequency of N70 events.</p> <p>“It is clear that the proposed airport will have a HIGH, negative impact on the existing and future suburban land uses to the south, against which no realistic or meaningful mitigation has been proposed or is likely available to be imposed. Based on the findings of the assessment, it is clear that the only feasible mitigation measure is to move the runway a distance to the north so that the significant noise impacts are largely located on the airport landholding. The assessment therefore does not adequately assess the impact of noise from the proposed development on the Greenville Garden City property. The application must be rejected on grounds of noise impact on the Greenville Garden City.”</p> <p>The assertion that the proposed Cape Winelands Airport (CWA) will have significant negative impacts on suburban land uses with no effective mitigations fails to consider the comprehensive strategies outlined in the Noise Impact Assessment (NIA). The NIA includes proven mitigation measures such as noise preferential routes, operational restrictions, and sound</p>
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			<p>insulation, all of which align with the ICAO's Balanced Approach to managing aircraft noise.</p> <p>The suggestion to relocate the runway further north overlooks critical technical and logistical factors, including wind alignment and safety standards, and would merely shift the impacts elsewhere instead of addressing them.</p> <p>The NIA evaluates the noise impacts on Greenville, offering detailed contour mapping and actionable strategies. Therefore, the claim of insufficient assessment is unsubstantiated. Given the comprehensive mitigations proposed, relocating the runway is neither practical nor necessary.</p>
		Annexure D: Map indicating areas of impact from noise cones of the proposed CWA project by MLH Architects dated September 2023	Noted by EAP
		Annexure E: Letter from Minister Anton Bredell concerning Noise Contours for Planning Decisions Around the Cape Town International Airport (CTIA) dated 9 May 2011	No comment required
		<p>Annexure F: Garden Cities letter of objection dated 13 January 2025</p> <p>LETTER OF OBJECTION</p> <p>PROPOSED EXPANSION OF FISANTEKRAAL AIRFIELD (AKA CAPE WINELANDS AIRFIELD) NOTICE OF DRAFT EIA PROCESS</p> <p>DEA&DP REF: 16/3/3/2/A5/20/2046/24 AND DWS REF: WU33620</p> <p>1. Further to your formal/advertised notification for the Draft EIA process and the associated Public Participation Process, relating to the various activities listed to facilitate a phased development to increase the existing Fisantekraal Airfield (aka CWA) and develop a runway with orientation 01-19 and a length of 3.5kms and the initial retention and refurbishment of a secondary cross runway with an orientation of 14-32 and length of 700m; with a phased supporting landside and airside infrastructure development, based on market demand, Garden Cities wish to: -</p> <ul style="list-style-type: none"> - Remain registered as an I&AP 	<p>1. Noted. Please note the cross runway of 700m does not form part of Alternative 3 (Preferred).</p>

		<p>- Lodge a formal objection based on the following reasons and concerns</p> <p>2. Historical background and associated concerns:</p> <p>2.1. Our initial concerns are linked to the formalization of the airstrip’s zoning and possible impacts same posed, as a direct result of this process and was based on both the process followed prior to the decision, as well as the implications of the decision on Garden Cities, our landholdings and our Greenville Development.</p> <p>The City of Cape Town's Municipal Planning Tribunal had granted the rezoning and consent approval. The reasons provided for the approval, did not acknowledge the existence of Greenville Garden City, and nor did it acknowledge the situation whereby the future development of the airport may have significant impacts on the development rights of Greenville Garden City and the current and future landowners of this large-scale, integrated, mixed use human settlement. As we stated in our Objection letter, dated 6 August 2020 (attached for ease of reference), Garden Cities find it problematic that in the 22 page LUM motivation report for the Fisantekraal Airfield, there is NO mention of Greenville Garden City.</p> <p>2.2. Garden Cities are the developers of Greenville Garden City and Erf 4 (this Erf alone constituting 384.6499 ha) Greenville Garden City is situated immediately to the south of the Fisantekraal Airfield.</p> <p>The LUM motivation report also failed to mention the fact that Garden Cities have secured significant land use rights for Greenville Garden City. These land use rights were secured following a full environmental, heritage and town planning application process, and include:</p> <ul style="list-style-type: none"> - 652 residential opportunities (State-assisted, finance linked & market) - 375 000sqm business GLA - 352 000sqm industrial GLA <p>2.3. Garden Cities are in the process of developing Greenville in a phased manner and have to date developed over 2,575 (as at Nov 2023) state-assisted houses. We have also developed Places of Worship, Educational Facilities, Clinis, Retail Facilities, etc..</p>	<p>2. Historical background.</p> <p>The Fisantekraal Aerodrome, as CWA was formerly known, has now been operational for 81 years without interruption. Portion 4 of Farm 474 Joostenbergs Kloof (114.1516 ha) and Portion 10 of Farm 724 Joostenbergs Vlake (36.1295 ha) make up the 150-ha existing airport site. The State created these two portions by subdividing Agricultural land in a bespoke configuration to specifically accommodate an aerodrome. The State was not bound by the zoning scheme under the previous Constitution and the site was never rezoned. The State imposed a condition of title that “the property shall be and/or remain to function as a public aerodrome and shall be used solely as a public aerodrome and/or for related purposes” when the property was sold into private ownership in 1993. This condition is adhered to as the use as an aerodrome is continuing to date without interruption. The City of Cape Town formally determined the existing use as an “airport” in terms of section 37(8) of the MPBL. Subsequently, the lawful existing use rights were rezoned to Transport Zone 1 with a consent for airport. No additional rights were applied for, nor granted, other than what could and was already exercised since 1943. The City’s Appeal Authority dismissed the appeal by Garden Cities on 09 February 2021 and the Municipal Planning Tribunal’s decision to unanimously approve the rezoning and consent stands.</p> <p>In stating the number of residential opportunities and business and industrial GLA, Garden Cities are implying that the development of the airport has a negative effect on all these rights. In phase 4 of the application, which is where Garden Cities say are most affected, there are 3600 residential opportunities, and it is clear from their site plan that none of the industrial or business GLA is located anywhere near phase 4. Garden Cities are amplifying the effect for their own benefit. No further precinct plans have been submitted showing changes as defined in clause 6.6 of the EA, and in fact all the industrial development is shown in phase 5, located approximately 4 kilometres away from the end of the main runway.</p>
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		<p>2.4. It is concerning that the applicant for the Fisantekraal Airfield was either:</p> <ol style="list-style-type: none"> 1. Not aware of Greenville Garden City and its development rights; which they have confirmed they were very much aware of Greenville’s approved Conceptual Layout and, or 2. Chose to not include this important fact in the LUM application; knowing that it poses severe and restrictive limitations in terms of future residential, educational and other zoning uses. <p>In either of the above situations, we are of the opinion that this was a fundamental flaw in the LUM application and subsequent decision.</p> <p>2.5. We also find it concerning that the City’s decision letter, dated 12 November 2020, the 9 ‘reasons for decision’ continues to ignore the existence of Greenville Garden City, with statements such as “is not incompatible with surrounding agricultural land uses”. We would have thought that the points raised by Garden Cities in our objection letter would have been noted, discussed, and then adequately addressed as part of the ‘reasons for decision’. In the absence of any reference to this issue, we find the City’s decision letter to be flawed.</p> <p>2.6. The planning for the Greenville Garden City landholdings took place over a number of years, in a joint manner together with the City of Cape Town. At this time, the City’s position with regard to the Fisantekraal Airfield was as follows: “... it can be expected that the land surrounding the airfield, in future be taken up by mainly residential uses. It is therefore concluded that the airfield should not remain in its present location, and any future applications relating to aviation uses should not be positively considered.” (Draft Northern District Plan (August 2009).</p> <p>2.7. The draft Cape Town Spatial Development Framework (August 2009) stated that: “All general aviation from Fisantekraal should be relocated to Atlantis.”</p> <p>The approved Northern District Plan (October 2012) went further to state: “The land use rights for the airfield to operate has however lapsed ... (and) that provision needs to be made elsewhere for such a facility.”</p> <p>This clear and unequivocal planning and policy context facilitated the land use layout for Greenville Garden City and was one of the imperatives for the development being approved by the Western Cape Government’s Department of</p>	<p>Garden Cities are now repeating the same flawed arguments it raised in the appeal against the rezoning which was rejected by the Appeal Authority.</p> <p>This is incorrect for a number of reasons:</p> <p>Firstly, the municipal planning is a local government competency in terms of Schedule 4, Part B of the Constitution. The City of Cape Town is the decision-maker, and the process was managed in exact accordance with the Municipal Planning By-law. To raise this issue as part of a comment on a NEMA process is an inappropriate and serves no purpose other than attempting to cast doubt. Should Garden Cities believe the City did not take all the relevant facts (which it now repeats) into account, it should have reviewed the City’s appeal decision in the High Court three years ago.</p> <p>Secondly, Garden Cities MPBL appeal was considered and not upheld due to the lack of merit in the arguments that are now repeated here. The applicant’s comprehensive rebuttal of the rezoning appeal by Garden Cities is on record with the City. The municipality is Constitutionally the competent authority in municipal planning matters, and not the Provincial Government. It therefore serves no purpose to use the current Environmental Authorisation process to debate a previously approved rezoning further.</p> <p>Thirdly, the spatial development frameworks that Garden Cities refer to has been replaced with a new MSDF and Northern District Plan. The error in the 2012 plan has been corrected. As an experienced developer, Garden Cities is fully aware a spatial development framework cannot grant or remove land use rights.</p>
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		<p>Environmental Affairs and Development Planning in December 2012. A copy of the Approval letter and Conceptual Layout is attached.</p> <p>Garden Cities are of the opinion that any decision which confirms land use rights for the Fisantekraal airfield has the potential to impact extremely negatively on the approved land use rights that have been granted for Greenville Garden City.</p> <p>2.8. We find it disingenuous that the Greenville Conceptual Plan is referenced (App-23-CWA-Spatial Planning-and-land-use-status, page 28) as lapsed plan; however in our mind the status of this plan is very much intact and merely implies that the rezoning is attended too as well when the LUM application is submitted to undertake the required subdivision of each future Phase of the development. The Concept Plan; Urban Edge; Agricultural Land (Act 70 of 70); the District Plan, Urban Development Designation and basket of rights cannot lapse, as this plan was approved by various authorities including the Western Cape Government, National Department of Agriculture and the City of Cape Town as an all-encompassing project.</p> <p>Extract (App-23-CWA-Spatial-Planning-and-land-use-status, page 28):</p>	<p>There is nothing disingenuous in quoting properly referenced a relevant fact supplied by the City of Cape Town as the relevant authority in the matter. A Zoning Scheme Extract issued by City of Cape Town on 07 June 2022, states that Erf 4 Greenville is zoned as "AGRICULTURAL ZONE (AG)", and we can only assume that rates and taxes based on agricultural tariffs have been paid and further notes that:</p> <p>"The rezoning of Erf 4, Greenville Garden City, issued under cover of the enclosed letter dated 3 December 2012, has lapsed. No submission has been made for the subdivision of Erf 4 within the 5-year time period allowed."</p> <p>The original rights, as described in the comment received from Garden Cities were granted on the 7th of December 2012. These rights were granted for a 5-year period. An application for an amendment of this environmental authorisation was done prior to the expiry of the first 5-year period and the Department of Environmental Affairs granted a further 5-year extension. This second extension of the EA expired on the 7th of December 2022, some 10 years after they were granted. The Department of Environmental Affairs is very specific and aware that the environment changes constantly, and as a result, the environment might be significantly different from the one that existed at the time of issuing the first EA and hence the validity of the EA cannot exceed a maximum of 10 years. Garden Cities has failed to commence with construction activities, on this erf 4 (Phase 4), now a period of 12 years since it was first approved. It should now have been deemed to have lapsed and a new application for an EA must be lodged which correlates with the City of Cape Town's lapsing of rights.</p>
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This very large new town is conceptualised to be developed in phases and the first phases have been implemented, infrastructure and top structures developed starting on the eastern side with its Phase 1.

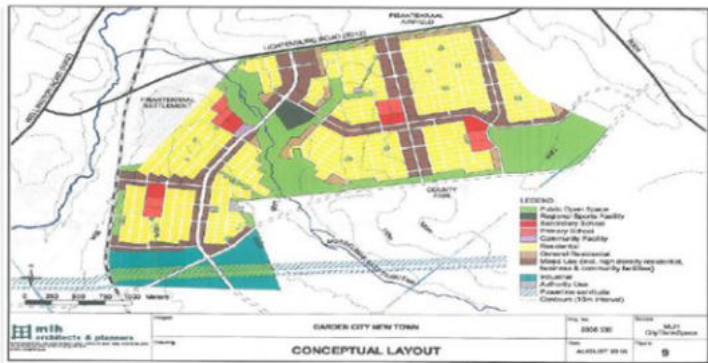


Fig. 17. Conceptual Layout Greenville
MLH architects and planners dated August 2010.
(source: Zoning Scheme Extract issued by City of Cape Town on 07 June 2022)

Erf 4, approximately 384 ha in extent, is directly to the south of Cape Winelands Airport, only separated by Lichtenberg Road (see Fig. 14). The 2010 Conceptual Layout envisaged Mixed Use (including high density residential, business and community facilities), residential, schools and open space.

As set out in the section under Existing Zoning, the Zoning Scheme Extract issued by City of Cape Town on 07 June 2022, states that Erf 4 Greenville is zoned as "AGRICULTURAL ZONE (AG)" and further notes that:
"The rezoning of Erf 4, Greenville Garden City, issued under cover of the enclosed letter dated 3 December 2012, has lapsed. No submission has been made for the subdivision of Erf 4 within the 5-year time period allowed."

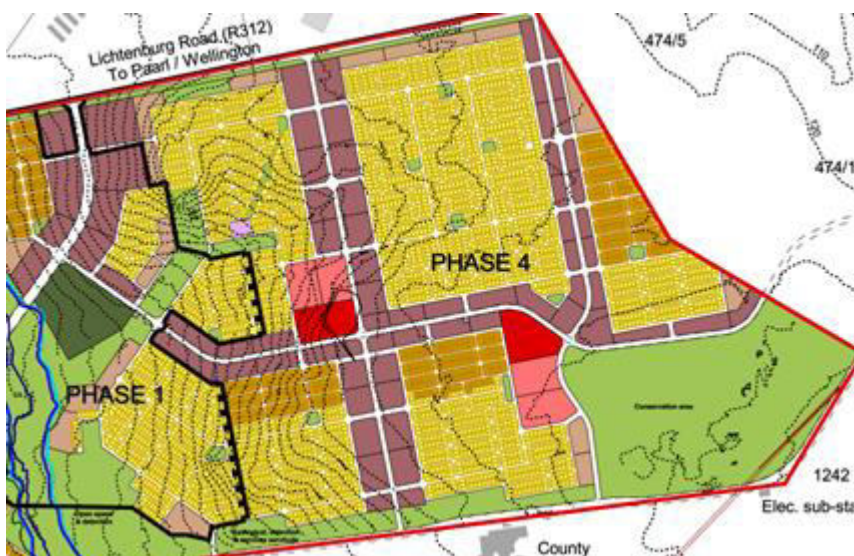
And in any event, this land use management decision was limited to the existing airfield and runways and not the currently envisaged regional airport.

3. Feedback relating to various Reports:

We have previously raised our concerns in our letter of objection dated the 05 Dec 2023 in which we clearly highlighted various concerns.

Based on our concerns and the severity of impacts posed by the proposed airport, Garden Cities has now appointed Mr. Richard Summers, from Summers Incorporated, to formally respond and object vehemently on our behalf.

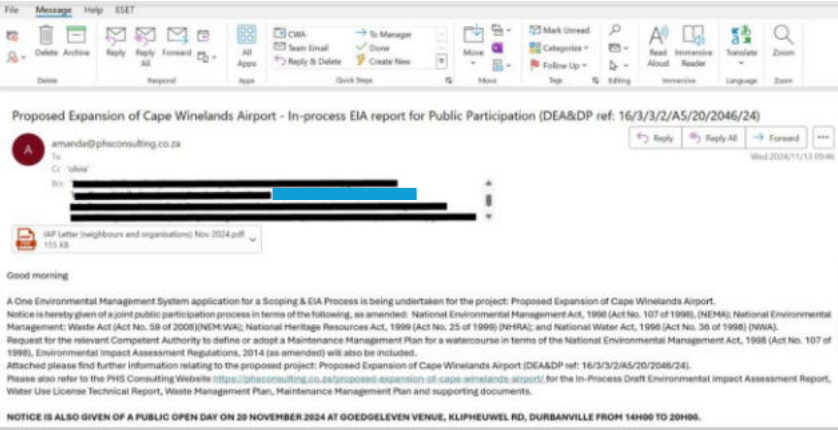
In addition to the rights lapsed because of no activity, there are 104 further conditions of the approval, many of which have not been achieved.



3. The EAP notes the comment.

		<p>We stand by our previous concerns raised and we address in Summers Incorporated specific concerns linked to:</p> <ul style="list-style-type: none"> - The NIA and misleading and misrepresentative information encompassed therein; our specialist report attached. - Garden Cities existing Land Use rights. - Various other concerns encompassed in the additional 47 reports submitted for review. <p>We are extremely concerned regarding the proposed CWA and the resultant impacts it will have on Greenville Garden City, and the layout that has been endorsed by the relevant authorities as part of the 10-year authorization process. The location of this airport is unsuitable in its present location and would strongly believe that other alternative locations should be considered as a more suitable and less invasive solution to the existing landscape, existing in-hand approvals and surrounding land-uses.</p>	<p>Please note the proposed project is for the expansion of an existing airport in an existing location. It is not for the development of a new airport at a new location. The concern re location alternative has been addressed previously.</p>
308	G. C. Heale	<p>Email dated 21 November 2024:</p> <ol style="list-style-type: none"> 1. Comments in favour of the Winelands Airport. I'm very much in favour of this development. <ol style="list-style-type: none"> 1. The Lanseria Airport in Johannesburg is a role model for Winelands. For many people it's closer, more convenient and easier to get to than Joburg's OT International Airport. 2. Around Lanseria, properties like Blair Atholl Estate have increased in value and are prime developments. 3. Many jobs will be available to the local communities during the construction period as well as sustainable jobs around the Airport and related businesses that will support this hub. 4. Lanseria Airport offers less costly airfares than OT International. 5. Passengers will have greater choice of convenient options. 6. Overall aviation safety is improved having an alternative to CT International especially during bad weather. 	<p>Email response provided 21 November 2024:</p> <ol style="list-style-type: none"> 1. Thank you for the email and the comments.

		<p>7. Bringing tourists and business directly into the greater Durbanville, Stellenbosch, Paarl, Franschhoek areas will be beneficial to local businesses.</p> <p>8. Having an independent airport breaks the monopoly stranglehold ACSA has on SA's airports. Competition always brings benefits.</p> <p>9. Every flight through Winelands eliminates traffic from the roads around CT International Airport, reducing congestion significantly. Every aircraft has 100's of passengers requiring vehicle transport BOTH to and from the airport.</p> <p>10. Not everyone flying into CT International has Cape Town as their destination. Many are targeting the West Coast, the Winelands etc and don't need or want to get into that CT traffic.</p> <p>I'm sure there are many more thoughts but record me as supporting this development.</p>	
309	Piet Steyn - NWE Consulting Engineers	<p>Email dated 21 November 2024:</p> <p>1. I am reaching out on behalf of NWE Consulting Engineers, and we are looking into the development of the Cape Winelands Airport. We are quite interested in the progress of this project and would like to get involved. Based on the Media Release on 22nd of October, it was advised that we contact you to be registered as an interested party. Feel free to let me know if you need any further information from me, or if you have any further information on the matter for me. I look forward hearing from you, have a lovely evening.</p>	<p>Email response provided 21 November 2024:</p> <p>1. Thank you for the email. We will register you as an I&AP for the proposed project. The draft EIAR is available for comment from 13 November to 13 December 2024 – please see the download link https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/ for the draft EIAR and supporting documentation to comment on.</p>
310	SP Nigrini	<p>Email dated 21 November 2024:</p> <p>1. ja als lyk reg gaan maar voort</p>	<p>1. This comment is noted.</p>
312	Wim Grapendaal	<p>Email dated 21 November 2024:</p> <p>1. Hi. Thank you for the opportunity to voice my opinion on the proposed new Cape Airport. No doubt there will be 60 million opinions in RSA. Gauteng has more than one airport. Now it is our turn to improve the economic welfare in the south western Cape. Vote for progress. We have more and more bodies on the planet. This is our chance to create a positive image of the Cape of</p>	<p>Email response provided 22 November 2024:</p> <p>1. Thank you for your email.</p>

		<p>Goodhope. Create permanent jobs. Sanral is committed to improve the access to the N1 National freeway. Just past the new airport. Hook up!! Why has China exploded on the Global economic scene in the last few decades? Not by asking every inhabitant's opinion. Time for action Enough talking. DO</p> <p>Email reply dated 22 November 2024:</p> <p>2. Pleasure!</p>	
314	Nomafu Mbanga -Buthelezi	<p>Email dated 26 November 2024:</p> <p>1. Thank you for your email and the contents therein. You have my full support for this project. I'll submit my comments as requested.</p>	<p>1. This comment is noted.</p>
315	Leslie Richmond	<p>Email dated 27 November 2024:</p> <p>1. Dear Sir it to whom it may concern, Today is 27/11/24. Why am I receiving this mail that's dated the 20/11/24. Meetings are done with already and the public are only being notified now ? ????????</p>	<p>Email response provided 27 November 2024:</p> <p>1. The notification was sent to you on 13 November 2024. Please see proof of notification attached:</p> 
316	Nigel Cupido – Local Resident	<p>Email dated 27 November 2024:</p>	<p>Email response provided 27 November 2024:</p> <p>1. Thank you for the email.</p>

		<p>1. How is the traffic impact on Wellington road in Durbanville going to be accommodated, we are residents in Welgevonden Estate and are always using Wellington & Okovango roads as primary access points.</p>	<p>The Transport impacts have been assessed in the Transport Impact Assessment – Appendix 25 to the draft EIAR.</p> <p>See the download link for the documents https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/</p> <p>Please provide comment by COB 13 December 2024 to me.</p> <p>Response from ITS:</p> <p>The TIA assessed the future transport demand for both background (other) developments in the area and the CWA traffic impact on Wellington Road. The section between the future R300 extension (referred to as Klipheuwel Road in the TIA) will be upgraded to a dual carriageway in sections over time to Lichtenburg Road. These upgrades will be development-driven as and when they happen. The intersections along Klipheuwel Road will also be upgraded accordingly.</p>
317	Lynne Stokes	<p>Email dated 3 December 2024:</p> <p>1. I want to put my two cents worth in here as I am one very unhappy citizen. I bought property here in Vierlanden some 30 odd years ago and have seen the place change. Nobody really likes change BUT to suddenly decide to turn our existing airport into a full blown international airport is absolutely unbearable to think about!!!!!! My biggest gripes are pollution and noise – not only the aeroplanes but the traffic as well, and don't try to downplay it because there is going to be a lot of noise. It is just not acceptable to us residents who chose a country style life and who pay exorbitant taxes (but we pay) to suddenly have all of this ripped away!!!!</p> <p>Why did you not go build your airport near Atlantis – which is what I was told way back when. One VERY unhappy resident.</p>	<p>Email response provided 3 December 2024:</p> <p>1. Thank you for the email and your concerns and comments are noted.</p> <p>The draft EIAR is currently in 30-day public participation up to and inclusive of 13 December 2024. The potential impacts (inclusive of transport, noise and air quality) have been assessed and are also available for download and consideration at the link https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/.</p>

		<p>Email reply dated 3 December 2024:</p> <p>2. Yes I have been there and done that – thank you. I just cannot see how an international airport 13 kilometres from my house is NOT going to impact us.</p>	<p>2. EAP response: The concerns are noted. The proposed project is for the expansion of an existing airport with existing rights. Impacts associated with the proposed project as assessed and mitigation proposed in the draft EIAR.</p>
320 & 337	Natasha Bieding & Ayesha Hamdulay - DEA&DP	<p>Email dated 6 December 2024:</p> <p>1. Herewith, please may you grant this Directorate with additional time in which to provide comments on the draft Environmental Impact Assessment Report for the following application:</p> <p>16/3/3/2/A5/20/2046/24 PROPOSED EXPANSION OF THE CAPE WINELANDS AIRPORT ON PORTION 10 OF FARM 724, REMAINING EXTENT OF FARM 724, PORTION 23 OF FARM 724, PORTION 7 OF FARM 942, REMAINING EXTENT OF FARM 474, PORTION 3 OF FARM 474 AND PORTION 4 OF FARM 474, FISANTEKRAAL, DURBANVILLE</p> <p>A response at your earliest convenience will be greatly appreciated regarding the above and extended due date.</p>	<p>Email response provided 6 December 2024:</p> <p>1. Thank you for the email.</p> <p>We grant DEA&DP extension until 13 January 2025 to provide comment on the draft EIAR.</p>
		<p>Email dated 30 December 2024:</p> <p>1. I trust you are well and remain safe.</p> <p>Please find attached this Directorate’s comments on the draft EIA Report for the proposed expansion of the existing Cape Winelands Airport.</p>	<p>Email response from CWA provided 30 December 2024:</p> <p>1. Thank you for your email and comments as contained in the attached letter, we acknowledge receipt and we will ensure that all comments are duly incorporated.</p>
		<p>Letter received via email dated 30 December 2024:</p> <p>COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT (“EIA”) REPORT SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) (“NEMA”) AND THE ENVIRONMENTAL IMPACT ASSESSMENT (“EIA”) REGULATIONS, 2014 (AS AMENDED) WITH RESPECT TO THE PROPOSED EXPANSION OF THE CAPE WINELANDS AIRPORT ON PORTION 10 OF THE FARM NO. 724, REMAINING EXTENT OF THE FARM NO. 724, PORTION 23 OF THE FARM NO. 724, PORTION 7 OF THE FARM NO. 942, REMAINING EXTENT OF THE</p>	

		<p>FARM NO. 474, PORTION 3 OF THE FARM NO. 474 AND PORTION 4 OF THE FARM NO. 474, FISANTEKRAAL, DURBANVILLE</p> <ol style="list-style-type: none"> 1. The draft EIA Report and supporting documentation, received by this Directorate via electronic mail correspondence on 13 November 2024, and the correspondence from this Directorate acknowledging receipt thereof (dated 22 November 2024), refer. 2. Having considered the information contained in the draft EIA Report and the supporting documentation, this Directorate in accordance with Regulation 7(5) of the EIA Regulations 2014, hereby provides the following comments with regard to the draft EIA Report: <ol style="list-style-type: none"> 2.1. Biodiversity Offset <ol style="list-style-type: none"> 2.1.1. Based on the information contained in the Terrestrial Offset Report (dated 27 August 2024 and compiled by Mr. Mark Botha) negotiations are still underway to (a) select the definite offsite offset site(s), and (b) finalise agreements with the landowners. Hence, you are reminded that these aspects must be finalised prior to the submission of the final EIA Report for decision-making. 2.1.2. This Directorate notes from the additional information submitted by PHS Consulting submitted via electronic mail correspondence on 13 November 2024, that there is an intention to secure Hercules Pilaar (1242) as an offsite offset site. The following must therefore be noted: <ol style="list-style-type: none"> 2.1.2.1. You are required to provide confirmation of whether Hercules Pilaar (1242) will be the only offsite offset site; 2.1.2.2. Should the Hercules Pilaar (1242) be the only offsite offset site, the National Biodiversity Offset Guideline (dated 23 June 2023 and issued under Section 24J of the NEMA) must be used to illustrate if Hercules Pilaar (1242) will suitably offset the biodiversity impacts associated with the proposed development (this will essentially require an amendment to the abovementioned Terrestrial Offset Report); 	<ol style="list-style-type: none"> 1. Noted 2. <ol style="list-style-type: none"> 2.1.1. Noted. Detail of the finalised offset site will be provided in the next round of PPP and amendments as required will be made to the Terrestrial Offset report. 2.1.2. Response from EAP: <ol style="list-style-type: none"> 2.1.2.1. The proposed site for offsite Terrestrial offset is Hercules Pilaar. Detail of the finalised offset site will be provided in the next round of PPP. The proposed wetland offset is on site and is detailed in the Freshwater Offset report (previously Appendix 8 to the draft EIAR). 2.1.2.2. Noted. The proposed site for offsite Terrestrial offset is Hercules Pilaar. Detail of the finalised offset site will be provided in the next round of PPP. 2.1.2.3. Noted 2.1.2.4. Noted 2.1.2.5. Noted 2.1.2.6. Noted 2.1.2.7. Comments from CN on the proposed Terrestrial offset site has been obtained. Please refer Comment 338 in this document. 2.1.2.8. Noted
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		<p>2.1.2.3. You are then to provide this Directorate with the finalise agreements with the landowner(s) of Hercules Pilaar (1242);</p> <p>2.1.2.4. The specifics of how the site will be secured (e.g., rezoning as Public Open Space) must be confirmed;</p> <p>2.1.2.5. Confirmation of the management costs of having offsite offset site must be specified in the relevant documentation;</p> <p>2.1.2.6. An assessment of the ecological condition of the abovementioned offsite offset site (i.e., Hercules Pilaar (1242)) must be undertaken;</p> <p>2.1.2.7. This Directorate must be provided with comments from CapeNature on the proposed offsite offset site (note that the comments obtained must be addressed and responded and proof hereof provided in the final EIA Report); and</p> <p>2.1.2.8. The demarcation of Hercules Pilaar (1242) in terms of the relevant Spatial Development Framework and the forward planning implications of securing the site as an offsite offset site, must be stipulated in subsequent reports.</p> <p>2.1.3. Furthermore, please note that as soon as any other offsite offset site(s) is finalised, in addition to/other than Hercules Pilaar (1242)), then the same requirements stipulated for Hercules Pilaar (1242) above, must be met.</p> <p>2.1.4. As soon as the abovementioned information is provided together with the amended Terrestrial Offset Report, then such information will constitute new information that must be circulated for a minimum commenting period of thirty (30) days. This must include a revised draft EIA Report and all updated/amended specialist reports/studies and input.</p> <p>2.2. Need and Desirability</p> <p>2.2.1. It is stated in Regulation 8 of the Environmental Impact Assessment (“EIA”) Regulations, 2014 (as amended), that a Competent Authority “must advise the proponent or applicant of any matter that may prejudice the success of an application”. As such, and due to the</p>	<p>2.1.3 Noted</p> <p>2.1.4 Noted</p> <p>2.2.1 Noted. The EAP awaits the comments from the Development Planning Intelligence Management and Research Branch.</p> <p>2.2.2 Noted. The EAP awaits the comments from the Landuse Planning section.</p>
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		<p>nature of your development proposal, this case will be referred to the Department's Development Planning Intelligence Management and Research Branch for comment. You will be informed of the relevant advice obtained, as soon as this becomes available.</p> <p>2.2.2. Further to the above, and in light of having reached the EIA phase, the case will again be referred to this Department's landuse planning section for further comment. You will be informed of the relevant advice obtained, as soon as this becomes available</p> <p>2.3. EIA Regulatory Requirements</p> <p>It is stated on page 3 of the draft EIA Report that "Where required the EIAR, EMPr, specialist and technical reports will be amended to reflect further I&AP input after which the final EIAR and EMPr will be submitted to DEA&DP for decision making". However, please be advised of that if significant changes have been made or significant new information has been added to the report or EMPr, then Regulation 23 (1)(b) of the EIA Regulations, 2014 (as amended) will be applicable.</p> <p>2.4. Project Details</p> <p>2.4.1. Please be reminded to provide a clear and concise description of the proposed development as well as all associated servicing infrastructure, access and internal roads, stormwater management, boundary walls and the confirmed total development footprint. This must include the various components that will be constructed under each proposed phase.</p> <p>2.4.2. Whilst it is stated that certain phases will be developed in accordance with market demand at the time, you must in the context of this application define all the definite components to be developed under each phase of the overall development.</p> <p>2.4.3. In a similar manner the definite components regarding bulk services and infrastructure are required. In this regard any other options e.g., the selected renewable energy sources that will be further considered after having reached the final EIA reporting phase will fall outside the scope of this current application, and must therefore</p>	<p>2.3 Noted</p> <p>2.4.1 Noted. The description of the proposed project and associated servicing infrastructure has been revised and included in the amended draft EAIR.</p> <p>2.4.2 Noted. The components associated with each precinct and phase has been described and included in the amended draft EAIR.</p> <p>2.4.3 Noted. The description of the proposed project and associated servicing infrastructure has been revised and included in the amended draft EAIR.</p>
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		<p>meet the requirements of the NEMA and EIA Regulations, 2014 (as amended), when and where applicable.</p> <p>2.4.4. It is stated on page 211 of the draft EIA Report that “further borehole development is required and has been commenced with”. Whilst the development of boreholes does not appear to trigger any Listed Activities in terms of the EIA Regulations, 2014 (as amended), you are reminded to not commence with any components of the proposed development given the stipulations as per paragraph 3 of this correspondence.</p> <p>2.4.5. Please ensure that all assessments assess all definitive components to be developed on the site.</p> <p>2.4.6. Given the nature and scale of the proposal, it is recommended that the schematics/spatial development plan reflect and colour code the different components to be developed on the site (it is requested that this spatial development plan includes the proposed fire breaks).</p> <p>2.4.7. It is understood that no components of the existing airport will be decommissioned, i.e., closed off permanently. Should this not be the case, all components of the existing airport to be decommissioned must be confirmed with this Directorate.</p> <p>2.4.8. It still remains unclear what the intentions will be for Portion 23 of the Farm 724, Fisantekraal will be (i.e., the area where the Uitsig quarry (Uitsig Clay Pit) is located). Please ensure that this is clarified in subsequent reports.</p> <p>2.5. Services Confirmation</p> <p>2.5.1. Since your application has reached the EIA phase final confirmation letters from the selected service providers regarding potable water supply, solid waste removal, effluent discharge and treatment as well as electricity for all phases of the proposed development must be provided. With regards to electricity, it is understood that 50% of the electricity will be provided by ESKOM and the other 50% will be</p>	<p>2.4.4 Noted. The drilling of a borehole is not a listed activity, but is vital in order to yield test and determine the sustainable yield. The sustainable yield is required to confirm the abstraction volume for the WULA application, therefore the drilling of all the boreholes were timed in this way.</p> <p>2.4.5 Noted. All specialists were provided with the full scope in order to assess all the components.</p> <p>2.4.6 The EAP clarified with DEA&DP that spatial development plan is equal to site development plan (SDP). The proposed SDP is currently colour coded. The firebreaks will be shown on the concept landscape plan, which will be updated and included in Appendix 26 to the draft EIAR.</p> <p>2.4.7 Response from CWA: The existing concrete runways will be demolished and will be used in the construction of the new runway / taxi ways, aprons etc. As far as the buildings are concerned these will be demolished.</p> <p>2.4.8. P23 of 724 forms part of the 7 land parcels of the application. The proposed project layout incorporates the quarry on P23/724 as part of the stormwater design. The land is owned by Corobrik, but after mine rehabilitation and closure the sale of the land will be effected, and ownership will be transferred to the applicant. Proof of closure certificate to be provided to DEA&DP during EIA process.</p> <p>2.5.1. The requirement is noted and will be complied with.</p>
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		<p>obtained via self-sufficient sustainable sources. Confirmation letters from Eskom must therefore be provided.</p> <p>2.5.2. Please ensure that service requirements are confirmed, as it is noted that in certain instances various options are presented, e.g., Option 1: Construction of an on-site Sewage Treatment Packaged Plant to treat sewage on the site, or Option 2: Construction of pumpstation and associated rising main to pump sewage to the Fisantekraal Waste Water Treatment Works, as detailed in the Bulk Engineering Service Report (dated November 2024 and compiled by Zutari (Pty) Ltd).</p> <p>2.5.3. According to the Borehole Yield and Quality Testing Report (dated 14 April 2022 and compiled by GEOSS South Africa (Pty) Ltd), the laboratory results indicated that groundwater is of 'marginal' water quality not suitable for domestic use without treatment. Hence, methods of groundwater treatment and the required infrastructure must be confirmed and included in the project description.</p> <p>2.6. Traffic Related Matters</p> <p>2.6.1. In both the Traffic Impact Assessment Report (dated 23 September 2024 and compiled by ITS) as well as Page 591 to 592 of the draft EIA Report, different access options are discussed. You are therefore reminded that final road/traffic related requirements, including the means of access/departure as well as the relevant phasing thereof, must be confirmed and included in the final EIA Report.</p> <p>2.6.2. Should any mean of access require input/confirmation/agreements from certain stakeholders e.g., landowners and/or Competent Authorities, e.g., CoCT then this information must be provided.</p> <p>2.6.3. The abovementioned Traffic Impact Assessment Report appears to only consider the impacts relating to Phase 1 of the proposed development, as per the following statement quoted from the said study: "Based on this assessment, it is evident that the impact of the CWA will be relatively low compared to the other future developments in the area. Hence, it is recommended that Phase 1 (PAL 1B) of the CWA be approved from a transport point of view,</p>	<p>2.5.2. This will be clarified in the amended EIAR as part of Alternative 4 (Preferred).</p> <p>2.5.3. Response from Zutari: The treatment of the groundwater as described in the Bulk Engineering report (previously Appendix 41 to the draft EIAR) stipulates that a water treatment plant will be provided to treat the water to meet SANS 241 (2015) standard. The final design of the plant will be confirmed only during tender phase post EA. The infrastructure requirement is listed in the Bulk Engineering report (section 7.4.1) and includes the plant, the storage tanks, a booster pumpstation and brine evaporation ponds.</p> <p>2.6. 2.6.1. EAP response: The TIA will be updated with the revised SDP which includes access and phasing thereof</p> <p>2.6.2. EAP response: This request is noted and will be complied with.</p> <p>2.6.3. Response from ITS: The amended TIA will be updated to assess the traffic and associated related impacts relevant to the entire development, and will be circulated with the next round of PPP.</p>
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and that an updated TIA be prepared for the future phases of the CWA". Given the extent of the proposed development and that the Scoping and EIA application is for the approval of the entire development, this Directorate requests that the said Traffic Impact Assessment Report be updated to assess the traffic and associated related impacts relevant to the entire development. The updated Traffic Impact Assessment will be considered as new information in which case must be circulated for a minimum commenting period of thirty days.

2.6.4. Please ensure that proof of the application made in terms of the National Water Act, 1998 (Act No. 36 of 1998) is submitted to this Directorate. Furthermore, the National Department of Water and Sanitation's comments/inputs on the proposed wetland offset must be provided and proof of having responded to and addressed the comments/inputs obtained must be submitted with subsequent reports.

2.6.5. It is stated on page 107 of the draft EIA Report, that a registration in terms of the Norms and Standards will be submitted to DEA&DP with a Waste Management Plan ("WMP") during the Impact Assessment Phase. You must therefore provide proof hereof as well as the progress made with regards to the said registration.

2.6.4. EAP response: Noted and will be complied with. Comments from DWS on the proposed wetland offset has been obtained and is included in this report.

2.6.5. EAP response: This Waste Management Plan (WMP) is in part fulfilment of the aforementioned NEM: WA Norms and Standards. Please note the WMP is an evolving document that will be shaped by the EIA process and final detailed operational procedure will become clear during the design phases for the WMF. As a norm a new waste facility must be registered with the competent authority in accordance with the N&S within 90 days prior to any construction of the WMF taking place. Considerable the amount of time before the WMF are constructed in relation to the current junction in the EIA process, it is therefore highly likely that this WMP will only be finally adopted by DEA&DP: WM after the Environmental Authorisation for the projects has been issued. Some design details of the WMF will therefore not form part of the WMP at this point in time until it's required to finally submit the WMP for adoption. Therefore 90 days prior to the construction of the WMF a NEM: WA Registration form will be submitted adhering to all the requirements of the N&S as attached under Annexure B.
Refer also to comments received from DEA&DP: WM under comment 323 in this report.

2.6.6. It is confirmed on pages 214 to 215 that hazardous waste will be generated during both the construction and operational phase. You must therefore confirm whether any Waste Licences/Permits will be required from the relevant Competent Authority, i.e., National Department of Forestry, Fisheries and the Environment. Proof of having lodge the said application must be included in all future reports regarding your Scoping and EIA application. Further, the impacts of hazardous waste during the construction and operational phases must be assessed.

2.6.7. It is understood that a freshwater offset is being proposed for the loss of 6.74ha (mostly seep wetland 1) freshwater habitat. Hence, all inputs from the relevant Competent Authority (National Department of Water and Sanitation) regarding the proposed freshwater offset must be provided together with the responses thereto.

2.6.6. EAP response:

The Hazardous waste generated during the construction phase relates to cement bags and sewage generated at the construction camp. The cement bags will be disposed to hazardous landfill site.

Sewage will be transferred initially to the Municipal WWTW until the WWTW on site is completed.

The possibility of asbestos in the old roofing of the existing hangers will be investigated and if found to be present, will be removed by a specialised service provider with the required disposal permits in place.

Further to this old fuel storage infrastructure/ equipment, hydrocarbon waste from the demolition of existing structures may also be generated and will be disposed to hazardous landfill site.

During the operational phase it includes oils from the petrol station catch-pit, which will be disposed of only in the event that a service provider cannot collect for reuse.

The biosolids from the WWTP could potentially be classified as hazardous - If the biosolids are regarded as hazardous it will be transported and disposed of at a hazardous waste facility.

All hazardous waste will be transported to the Vissershok site. Vissershok site is off the N7 into Frankdale Road, adjacent to Morningstar.

2.6.7. The National Department of Water and Sanitation (DWS) was engaged as a commenting authority throughout the public participation process for the proposed development. While DWS provided general feedback on the EIA on 9 January 2025, no

specific comments were made regarding the proposed freshwater offset.

FEN Consulting has been appointed to conduct the freshwater ecosystem offset investigation to address the anticipated wetland loss associated with the proposed development. To ensure comprehensive input, FEN Consulting requested feedback from DWS on the wetland offset report on January 13, 2024. The following input was provided by Shaddai Danniell and responses subsequently provided by FEN and Zutari

DWS Comment	FEN & Zutari Response
<p>Protocol to deal with wetland offsets is done specifically through the process of the WULA. However, I have scanned through the report and can make the following comments:</p> <ol style="list-style-type: none"> 1. It is agreed that an on-site wetland offset is more desirable than having it offsite. 2. It is understand that a totally of 7.44 ha of the seep wetland will be lost. Please confirm, as there are statements of total loss and then rehabilitating the remaining extent of the seep. This requires clarity please. 3. Please note that DWS is guided by the no net loss of area and 	<p>Noted.</p> <ol style="list-style-type: none"> 1. Noted. 2. A total of 7.44 ha of seep wetland habitat will be lost (this includes the western extent of the seep wetland only), correct. The remainder of the wetland (3.68 ha – i.e. the eastern extent) is proposed to be offset along with a portion of the CVB wetland located further east (36.2 ha of wetland habitat). See further explanation under comment 3 below. 3. Please see below table of the gains, as indicated in the report

			<p>functionality. Therefore, the proposed wetland offset must indicate and produce wetland gains respectively. It is understood that the drivers need to be in place for an offset to be 'successful.' However, an offset cannot be located completely within an existing wetland (in this case the CVB).</p>	<p>(refer to table of gains below this inset table).</p> <p>Please could you provide clarity on the following sentence: "However, an offset cannot be located completely within an existing wetland (in this case the CVB)."</p> <p>The offset will involve two wetlands – the remainder of the seep wetland of which the western reach will be lost, and the CVB wetland. As indicated in the report, offsetting only the remainder of the seep wetland (3.68 ha) will not be sufficient to achieve the 3.97 HaE wetland functionality and 13 HaE ecosystem conservation target, therefore a CVB wetland which is fed by the seep wetland via an agricultural drain was therefore also investigated to achieve the offset target. Like-for-like offset will be achieved since the WET-VEG type of the development site and the offset area is the same, i.e. West Coast Shale Renosterveld. Combined, these wetland reaches will achieve the offset targets for wetland functionality and ecosystem</p>
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			<p>4. Areas that have been earmarked for the offset area, will not be allowed to be developed in the future.</p> <p>5. It is understood that biodiversity targets and offsets will be achieved through the wetland offset. Please ensure that monitoring and evaluation for each mandate is done respectively.</p> <p>6. Rehabilitation, maintenance and management of the watercourses, including the offset area, is to be done in perpetuity.</p> <p>7. Stormwater must be polished before entering any watercourse.</p>	<p>conservation as indicated in the table above.</p> <p>4. Noted and agreed with. The offset investigation explicitly excluded the proposed future access roads from the offset calculations to allow those roads to potentially be developed in the future, with the required authorisations in place.</p> <p>5. This is included in the offset report as well as the EMPR and WULA technical summary report.</p> <p>6. This is included in the offset report. Cape winelands Airport is committed to manage these watercourses in perpetuity, as indicated in the signed memorandum of understanding which will be included in the final offset report as Appendix K. This is also included in the WULA technical summary report as authorisation conditions.</p> <p>7. Noted and agreed with. This is included and addressed in the freshwater report and in the Stormwater Management Plan compiled by Zutari. This is also</p>
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		<p>2.7. Associated Impacts</p> <p>2.7.1. Please ensure that when all relevant mitigation measures proposed throughout the Scoping and EIA process, the specialist studies/input</p>	<p>8. The ponds and associated infrastructures must ideally not be located within any of the watercourses.</p> <p>Please note again, details and specifics regarding the offset will be dealt with during the WULA process. This is not an indication that we accept the proposed offset plan. The outcome will only be available when the outcome of the WULA process has been finalised.</p>	<p>included in the WULA technical summary report as authorisation conditions.</p> <p>8. Noted. None of the ponds associated with the proposed Cape Winelands Airport development are located within any watercourse.</p> <p>Noted with thanks.</p>																						
			<p>Table of gains:</p> <table border="1" data-bbox="1317 818 2128 1209"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Wetland offset target (HaE)</th> <th rowspan="2">Proposed offset area (HaE)</th> <th colspan="2">Final offset contribution (ha)*</th> <th rowspan="2">Comments</th> </tr> <tr> <th>Seep wetland</th> <th>CVB wetland</th> </tr> </thead> <tbody> <tr> <td>Wetland functionality (HaE)</td> <td>3.97</td> <td>4.1 (0.3+3.8)</td> <td rowspan="3">3.68</td> <td rowspan="3">36.2</td> <td>Offset contribution exceeds as what is required by the offset target</td> </tr> <tr> <td>Ecosystem Conservation (HaE)</td> <td>13.0</td> <td>30.5 (2.8+27.7)</td> <td>Offset contribution exceeds what is required by the offset target</td> </tr> <tr> <td>Species Conservation (HaE)</td> <td>-</td> <td>-</td> <td>Not assessed, however the biodiversity offset along with the wetland offset is regarded as appropriate to address species loss.</td> </tr> </tbody> </table> <p>* The final offset contribution is the sum of the offset contribution of the respective wetlands, therefore equating to ~40 ha.</p> <p>2.7.</p>			Wetland offset target (HaE)	Proposed offset area (HaE)	Final offset contribution (ha)*		Comments	Seep wetland	CVB wetland	Wetland functionality (HaE)	3.97	4.1 (0.3+3.8)	3.68	36.2	Offset contribution exceeds as what is required by the offset target	Ecosystem Conservation (HaE)	13.0	30.5 (2.8+27.7)	Offset contribution exceeds what is required by the offset target	Species Conservation (HaE)	-	-	Not assessed, however the biodiversity offset along with the wetland offset is regarded as appropriate to address species loss.
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Ecosystem Conservation (HaE)	13.0	30.5 (2.8+27.7)			Offset contribution exceeds what is required by the offset target																					
Species Conservation (HaE)	-	-			Not assessed, however the biodiversity offset along with the wetland offset is regarded as appropriate to address species loss.																					

		<p>(where applicable) and other inputs obtained are included in the EMPr and that in instances where certain mitigation measures must be implemented at/prior a specific phase of the development's lifecycle, that this is clearly made known and specified, as such.</p> <p>2.7.2. Whilst certain technical management plans are indicated and confirmed to be implemented, as part of the conditions of an Environmental Authorisation proposed on page 679 of the draft EIA Report, you must provide additional information/motivations on why these technical management plans were not compiled earlier.</p> <p>2.7.3. Additionally, it appears that other mechanisms/resources are required to mitigate certain impacts, as mentioned throughout the draft EIA Report, including inter alia:</p> <p>2.7.3.1. Stormwater Management Plan;</p> <p>2.7.3.2. Master Landscape Plan</p> <p>2.7.3.3. High-level Rehabilitation Plan (wetland offset);</p> <p>2.7.3.4. Freshwater Offset Plan;</p>	<p>2.7.1. EAP response: the mitigation measures and implementation stage are included in the EMPr as appropriate.</p> <p>2.7.2. EAP response: Certain technical management plans will be required as condition of the EA:</p> <ul style="list-style-type: none"> • Wildlife Management Plan (inclusive of bird strike alleviation)- The requirement is that a wildlife hazard management plan (WHMP) should be developed in collaboration with the operator. It should be designed in accordance with the requirements of the SACAA and also be compliant with international best practise in order to effectively address risks and include an adaptive management element. The WHMP should be reviewed annually. • Emergency preparedness and response plan – Operational plan dependant on final design and layout of site. To be updated every 2 years. • Groundwater Quality Monitoring Plan – To be compiled once monitoring borehole network is complete and all positions are confirmed. • Noise Management Plan – Operational requirement dependant on the input from industry and IAPs. Follows on the establishment of a noise monitoring committee. • Service Infrastructure Management Plan – Operational requirement to be completed once final design and scope of services infrastructure is complete and should be updated every two years. <p>2.7.3. EAP response:</p> <p>2.7.3.1 A Stormwater Management Plan (SWMP) was circulated for comment as part of the draft EIAR as Appendix 46. The SWMP forms part of the EMPr and is included as Annexure 10 to the EMPr.</p> <p>2.7.3.2 A Concept Landscape Plan has been included in the EIAR (Appendix 26) and EMPr (Appendix 9). The Concept Landscape Plan forms the basis of a Landscape Guideline and Master Landscape Plan that will supersede the</p>
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		<p>2.7.3.5. Maintenance Plans (to address any issues that arise, e.g., blockages in stormwater infrastructure or changes in vegetation health, etc.)</p> <p>2.7.3.6. Monitoring program to include wetland health and driver and receptor monitoring;</p> <p>2.7.3.7. Adaptive Management Plan that allows for adjustments in key areas;</p>	<p>Concept Landscape Plan which is to be submitted and approved by the City of Cape Town (CoCT) prior to development commencing. As stated in the EMPr.</p> <p>2.7.3.3 and 2.7.3.4 – This requirement is found in the Freshwater Report. A Wetland Offset Study and Implementation Plan covers both these plans and is inclusive of rehabilitation. This document was circulated as part of the draft EIAR (Appendix 8) and is included as Annexure 7 in the EMPr.</p> <p>2.7.3.5 to 2.7.3.6 - This requirement is found in the Freshwater Report. A request for the definition or adoption of a Maintenance Management Plan was included as part of the draft EIAR under Appendix 38, which encompasses all standard maintenance management aspects in this regard. Maintenance aspects associated with wetland offset and rehabilitation which requires development and implementation post development phase and has been addressed in the Wetland Offset Study and Implementation Plan (included as Appendix 8 in the Draft EIAR). This includes a monitoring program to include wetland health and driver and receptor monitoring. Furthermore, the EMPr addresses all other related maintenance and monitoring aspects and encompasses these plans within the EMPr as well.</p> <p>The MMP is included as Appendix 16 and the Wetland Offset Study and Implementation Plan as Annexure 7 in the EMPr. The EMPr itself is included in Annexure 39 of the Final EIAR.</p> <p>2.3.7.7 This requirement is found in the Freshwater Report. The EMPr is considered the 'Adaptive Management Plan'. As an open – ended document, information gained during on-going monitoring of procedures on site could lead to changes in the recommendations and specifications of the EMPr. The EMPr is therefore an adaptive management plan that will constantly evolve and be improved upon during the life cycle of the project.</p> <p>The EMPr (Annexure 39) is considered an adaptive management plan that allows for adjustments within key areas and within the framework of various approvals obtained and encompasses the procedures in place to ensure these changes are brought about within a responsible manner. This requirement is already addressed in the form of the EMPr and will not be a separate or free-standing report.</p>
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		<p>2.7.3.8. Rehabilitation Plan (for the remaining on-site aquatic features)</p> <p>2.7.3.9. The monitoring programme to detect and prevent the pollution of soils, surface water and groundwater;</p> <p>2.7.3.10. Emergency Spill Protocols (to prevent the pollutants from being transported via stormwater infrastructure into the downgradient wetlands);</p>	<p>2.7.3.8 This requirement is found in the Freshwater Report. As per 2.7.3.3 above.</p> <p>2.7.3.9 This requirement is found in the Freshwater Report. The Maintenance Management Plan was included as part of the draft EIAR under Appendix 38, which encompasses all standard maintenance management aspects in this regard. Maintenance aspects associated with wetland offset and rehabilitation which requires development and implementation post development phase and has been addressed in the Wetland Offset Study and Implementation Plan (included as Appendix 8 in the Draft EIAR). This includes a monitoring program to include wetland health and driver and receptor monitoring. Furthermore, the EMPr addresses all other aspects to detect and prevent the pollution of soils, surface water and groundwater related aspects and is all encompassing The MMP is included as Appendix 16 and the Wetland Offset Study and Implementation Plan as Annexure 7 in the EMPr. The EMPr itself is included in Annexure 39 of the Final EIAR. These actions are therefore covered in the EMPr. For detail on the Groundwater monitoring network – refer point 2.7.3.17.</p> <p>2.7.3.10 This requirement is found in the Freshwater Report. This reference is specifically regarding the Operational Phase of the development and has been addressed in Goal 11: Emergency Preparedness and Response Management in the EMPr (Appendix 39). An Emergency Preparedness and Response Plan is proposed as a condition of approval. As part of this plan, Standard Operating Procedures (SOPs) are to be compiled for each of the following:</p> <ul style="list-style-type: none"> • Off-loading of fuel into depot; • Filling of fuel bowsers;
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2.7.3.11. Monitoring Plan (for the development and the immediate zone of influence to prevent erosion and incision);

- Filling of aircraft with fuel;
- Operational spillages – clean-up procedures;
- Minimizing of fuel vapours in fuel depot;
- Procedures for engine run-up;
- Maintenance workshops – oil separators; and
- Aircraft wash bays – oil separators.

The emergency plan must be compiled to ensure a quick response and attendance to the matter in case of a leakage or bursting of a pipeline or overtopping of sewage at the treatment plant and/or bio-digester.

An emergency spill protocol must be included and is to be maintained for the CWA, especially for potential spills on the runways, aprons, roads, etc. to prevent the pollutants from being transported via stormwater infrastructure into the downgradient wetlands.

2.7.3.11

This requirement is found in the Freshwater Report.

The Maintenance Management Plan was included as part of the draft EIAR under Appendix 38, which encompasses all standard maintenance management aspects in this regard. Maintenance aspects associated with wetland offset and rehabilitation which requires development and implementation post development phase and has been addressed in the Wetland Offset Study and Implementation Plan (included as Appendix 8 in the Draft EIAR). This includes a monitoring program to include wetland health and driver and receptor monitoring. Furthermore, the EMPr addresses all other aspects to detect and prevent the pollution of soils, surface water and groundwater related aspects and is all encompassing

The MMP is included as Appendix 16 and the Wetland Offset Study and Implementation Plan as Annexure 7 in the EMPr. The EMPr itself is included in Annexure 39 of the Final EIAR. These actions are therefore covered in the EMPr.

Refer to point 2.7.3.5.

		<p>2.7.3.12. Bird and Wildlife Hazard Management Plan;</p> <p>2.7.3.13. Landscape Concept Plan / Landscape Plans;</p> <p>2.7.3.14. Water Scarcity Management Plan;</p>	<p>The EMPr includes all the recommendations made in the Stormwater Management Plan which addresses components regarding the monitoring of erosion and incision. Furthermore, the SWMP is included as Annexure 10 in the EMPr. Design, Pre-Construction and Construction stormwater management elements are addressed in Section 4.1 – 4.3 of the EMPr. Section 4.4 addresses stormwater operational management aspects with specific reference to Goal 7: Storm Water Management.</p> <p>2.7.3.12 Recommended mitigation measures require that a Wildlife Hazard Management Plan (WHMP) should be developed in collaboration with the operator. It should be designed in accordance with the requirements of the SACAA and be compliant with international best practise in order to effectively address risks and include an adaptive management element. The WHMP should be reviewed annually.</p> <p>The plan needs to be developed post authorisation when operators are fixed and the SACAA process is concluded.</p> <p>This will be made a condition of approval and is addressed in Goal 4: Safeguard terrestrial (fauna & avifauna) ecological features of the EMPr (Appendix 39).</p> <p>2.7.3.13 A Concept Landscape Plan has been included in the EIAR (Appendix 26) and EMPr (Appendix 9). The Concept Landscape Plan forms the basis of a Landscape Guideline and Master Landscape Plan that will supersede the Concept Landscape Plan and is to be submitted and approved by CoCT prior to development commencing. As stated in the EMPr.</p> <p>2.7.3.14 This requirement is found in the Climate Change Impact Assessment Report. This aspect is addressed in the EMPr (Appendix 39). Under Section 4.1: Design Management Plan a sub-section was included under section 4.1.13 Waste, Water & Energy Guidelines. A number of water efficiency measures, amongst others, have been noted for inclusion at the design phase. Furthermore, water wastage is highlighted as part of the Environmental Awareness Training for Site Personnel; Monitoring Programmes are to be implemented to prevent groundwater contamination and over abstraction; alternative dust suppression measures to potable water etc. are addressed as part of the construction (and operational) phases of the development. Furthermore, under section 4.4 specific operational aspects in this regard are addressed in Goal 14: Adaption to Climate Change (Wild fires, Water Scarcity,</p>
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		<p>2.7.3.15. Waste Management Plan, which include aspects such as recycling and composting;</p> <p>2.7.3.16. Outdoor Signage Master Plan;</p> <p>2.7.3.17. Monitoring Network and Monitoring Plan;</p> <p>2.7.3.18. An EMP for the remaining conservation worthy areas on the site;</p>	<p>Extreme Heat, Urban and Riverine Floods), where water efficiency aspects are highlighted. GOAL 18: WATER EFFICIENCY & CONSERVATION in the EMPr deals with water scarcity.</p> <p>The Water Use Licence Application is based on water resource management principles and minimisation of water use and therefore also largely addresses this aspect.</p> <p>This aspect is therefore addressed through the EMPr and the WULA (Appendix 30) and will not form part of a separate plan.</p> <p>2.7.3.15 Waste Management is addressed within all phases of the EMPr (Appendix 39) in varying degrees. However, a Waste Management Plan has been compiled and included in the EMPr (Annexure 8), addressing all Waste Management related aspects in detail.</p> <p>2.7.3.16 An Outdoor Signage Guideline was included as part of the draft EIAR as Appendix 32. This concept guideline document forms the basis of the Outdoor Signage Master Plan that will supersede the Outdoor Signage Guideline and, as will the Landscaping Plan, is to be submitted and approved by CoCT prior to development commencing. As stated in the EMPr.</p> <p>2.7.3.17 This is a requirement of the Geohydrological Specialist and has been addressed in detail in the EMPr. Section 4.2 and 4.3 addresses management aspects in terms of Pre-Construction and Construction activities and includes the Geohydrological monitoring plan requirements (under 4.2, Section G: Monitoring Requirements). Furthermore, in terms of Section 4.4 the Operational Phase monitoring plan requirements are included in Goal 1: Safeguard Geohydrological Features.</p> <p>However, this is also a requirement in terms of the Noise Impact Assessment and is to made a condition of approval prior to any operational activities commencing. The plan needs to be developed post authorisation when operators are fixed and the SACAA process is concluded. This plan is addressed in Goal 10: Noise Management of the EMPr (Annexure 39).</p> <p>2.7.3.18 This requirement is found within the Botanical Impact Assessment. Please refer to the EMPr included in the EIAR (Appendix 39). The EMPr is all encompassing and incorporates management principles for the conservation worthy areas on the site during the Design, Construction and Operational</p>
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2.7.3.19. Plant Search and Rescue plan; and

2.7.3.20. Detailed Construction Management Plan, as per the Traffic Impact Assessment Report (dated 23 September 2024 and compiled by ITS).

It is therefore requested that you indicate and motivate at which stage each of the above documents will be compiled. Depending on your responses, should you confirm that the said or any other mechanisms/resources will be compiled prior to the decision pending your current application (Reference: 16/3/3/2/A5/20/2046/24), then such information will be regarded as new information, which must be circulated to all I&APS for a minimum commenting period of thirty (30) days. Furthermore, should any of the above or any other mechanisms/resources fall outside of the scope of your EIA application process e.g., Freshwater Offset Plan (DWS competency) and Stormwater Management Plan (CoCT competency), then this information must be made known through the appropriate motivation.

2.7.4. It is understood that an Alien Invasive Vegetation Management Plan is already being implemented on the site. It is, therefore, requested that clarity be provided on whether the existing Alien Invasive Vegetation Management Plan will be updated as a result of the proposed development or whether a new Alien Invasive Vegetation

Phases of the development. Section 4.1 – 4.3 in the EMPr addresses management actions regarding the Design, Pre-Construction and Construction Phases and Section 4.4 addresses management actions during the Operational Phase, with specific reference to Goal 13: Conservation Management of on-site sensitive areas and Goal 8: Additional Management for Agricultural Areas.

2.7.3.19 This requirement is found within the Botanical Impact Assessment. Plant Search and Rescue, as recommended by the Botanical Specialist, has been incorporated into the EMPr (Appendix 39). In Section 4.2 the Pre-Construction Management Plan addresses Search and Rescue in detail (Section F. Protection of sensitive features (Search & Rescue)). Furthermore, a Method Statement is required for Plant Search & Rescue, to be approved by the Botanist and ECO, prior to any construction works commencing.

2.7.3.20 A detailed construction management plan forms part of the EMPr and includes applicable traffic mitigation and management measures identified by ITS. The EMPr was included as Appendix 43A in the draft EIAR and as Appendix 39 in the amended EIR.

		<p>Management Plan will be compiled. If the latter is applicable, the following must be similarly met:</p> <p>2.7.4.1. An indication, including motivation, of which stage the new/updated Alien Invasive Vegetation Management Plan will be compiled; and</p> <p>2.7.4.2. The circulation of the new/updated Alien Invasive Vegetation Management Plan to all I&APS for a minimum commenting period of thirty (30) days.</p> <p>2.7.5. According to the information included in the draft EIA Report, certain areas, including the Greenville Garden City and eastern side of Bella Riva will be located in zones that exceed noise levels stipulated in the district guidelines for Urban Residential areas. All evidence of having engaged receptors, and the outcomes thereof, must be provided, where so applicable and available. It is further requested that all efforts and measures proposed by the relevant specialists to reduce and mitigate noise impacts on these receptors be provided. Should such measures enable the reduction in noise levels so that the abovementioned receptors will experience acceptable noise levels in accordance with the district guidelines for Urban Residential areas then such information must be provided. In cases where such measures will not be able to reduce noise levels, then this information must be motivated.</p> <p>2.7.6. It is noted that offsite noise monitoring terminals, which are integral to the monitoring of the noise levels of the airport expansion are proposed in the Klipheuwel area, the Greenville Garden City Development and the Bella Riva development. Hence, consent from the landowners where the noise monitoring terminals are proposed must be provided as soon as possible.</p>	<p>2.7.4.1 EAP response: An Alien Invasive Vegetation Management Plan formed part of the draft EIAR as Appendix 43B. It includes all the requirements, and the area related to the existing Alien Invasive Vegetation Management Plan and replaces it upon Environmental Authorisation. In the amended draft EIAR it is included as Annexure 6 to the EMPr in Appendix 39.</p> <p>2.7.4.2 The Alien Invasive Vegetation Management Plan was circulated for 30 days to registered IAPs during the 13 November to 13 December 2024 commenting period, and will be circulated again during the next round of PPP.</p> <p>2.7.5 Response from EAP: the proof of consultation with receptors is included as part of stakeholder engagement. Mitigation proposed by the specialist aims to reduce and mitigate noise impacts on these receptors. The consultation with stakeholders is ongoing.</p> <p>2.7.6 Response from EAP: The noise monitoring network will be finalised as part of the noise monitoring plan once EA is obtained, after which individual landowners will be engaged. As required by the specialist: Three permanent noise monitoring terminals should be established before or by the operational year of the expanded CWA</p> <p>2.7.7 Response from specialist:</p>
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2.7.7. Since the bulk of the measures to mitigate the botanical impacts include translocation, search and rescue, please ensure the following:

2.7.7.1. Detailed information is provided on how and when translocation is proposed to take place;

2.7.7.2. Detailed information is provided on how and when search and rescue is proposed to take place; and

2.7.7.3. A finalised map is provided which illustrates all the 'no-go' and buffer areas to be implemented throughout the lifecycle of the proposed development, as is required by Section 3(1)(l(ii) of Appendix 3 of the EIA Regulations, 2014 (as amended).

2.8. Strategic Context

Section 4.3 of the draft EIA Report titled, "Policy Framework applicable to the proposed development", provides an outline of the policy frameworks applicable to the proposed development, hence you are reminded to provide descriptive information to detail and illustrate how the development is consistent with such policy frameworks and resources. In instances where the proposed development is inconsistent with particular policy frameworks and resources (e.g., the proposed site being located outside the Urban Development Edge) and its eastern boundary being located in the Core Biodiversity Area of Coincidence as well as in an Area of Agricultural Significance, as per the Northern District Plan), detailed motivations and information must be provide on why such inconsistencies or deviations from the relevant policy frameworks and resources must be deemed permissible, or not.

The Botanical IA has been amended to include the requirements from 2.7.7.1 and 2.7.7.2.

An additional map has been generated for the 5m construction buffer as required in the updated Botanical IA, and it has been included in Appendix 26 to the draft EIAR.

2.8. Response from H&A planning:

Municipal Planning Frameworks fall exclusively within the ambit of the CoCT. Section 40(1) of the Constitution clarifies that provinces are no longer a higher tier of government in respect of local government but are instead an equal spheres of government. Schedule 4B makes Municipal Planning an exclusive local government competency. The MSDF and District Plans fall unquestionably in this category. Therefore, DEADP can provide comments to the CoCT, which retains the sole prerogative to make such decisions within the MPBL process.

The MPBL explicitly prescribes the process to be followed by the decision-maker (the CoCT) to determine whether site-specific circumstances exist regarding a development application. Such applications are submitted under the MPBL, not under NEMA. The MPBL process requires that land-use applications reference these deviations specifically in advertisements so the public can provide input on the site-specific circumstances. The CoCT cannot prejudice its own decision-making by commenting to DEADP before considering the public's responses to the prescribed advertisements. The CoCT, as the decision-maker, must take public comments into account before considering the deviations from the MSDF. Failing to do so would render its decision vulnerable to judicial review in the High Court.

The relevant legislative provisions are:

			<ul style="list-style-type: none"> • Section 9 of the MPBL – Status of the Municipal Spatial Development Framework: <ol style="list-style-type: none"> (1) Subject to section 22, the <u>City may deviate from the provisions of the MSDF</u> only if site-specific circumstances justify the deviation. (2) In determining whether such site-specific circumstances exist, <u>the City must have regard</u> to the development application submitted¹ and any other relevant considerations. (3) If an application is inconsistent with the MSDF, the applicant must describe the inconsistency in – <ol style="list-style-type: none"> (a) the application; and (b) the advertisement of the application. <ul style="list-style-type: none"> • Section 99 of the MPBL – Criteria for deciding applications: <ol style="list-style-type: none"> (b) The proposed land use must comply with or be consistent with the municipal spatial development framework. If it does not, a deviation from the municipal spatial development framework must be permissible. <p>¹ This refers to an application submitted in terms of the MPBL</p> <p>Section 9 and 99 of the MPBL reinforces that determining the permissibility of deviations rests solely with the CoCT. Any assessment or comment by DEADP regarding deviations from policy frameworks should remain strictly advisory and must not pre-empt CoCT’s decision-making process. This approach upholds the separation of powers and respects the legally prescribed processes.</p> <p>Regarding the first part of the request from DEADP, quoted above, which is to provide detailed descriptions and illustrations of the compliance, consistencies, inconsistencies and deviations from the policy frameworks, Appendix 36 deals with in in great depth.</p> <p>We did address the reasons for not doing so in the specialist report (App-36-CWA-in-the-context-of-Spatial-Policy-and-Land-Use-Rights, pages 15 and 36).</p>
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		<p>2.9. Specialist Input</p> <p>2.9.1. Please ensure that comments are obtained from this Department’s Air Pollution Air Quality Management Directorate as well as the City of Cape Town’s Air Quality Branch on the Air Quality Impact Assessment Report (dated 11 November 2024 and compiled by DDA Environmental Engineers). All comments obtained must be addressed and responded to and proof thereof included in the Comments and Response Report.</p> <p>2.9.2. It is noted that given the potential noise impacts on certain sensitive receptors such as the proposed residential developments of Bella Riva and Greenville Garden City emphasis is placed on these receptors having to introduce noise mitigation measures stipulated in the Noise Impact Assessment Report (dated November 2024 and compiled by Demos Dracoulides). Please note that within the context of your scoping and EIA application, no empowering provisions exists to impose conditions on private third parties. Hence, measures to mitigate noise impacts on sensitive receptors, which are to be implemented by the holder of the decision pending this application must be presented. An indication of whether such measures will adequately mitigate noise impact on the sensitive receptors to acceptable levels, or not, must be provided. If not, motivations must further be provided on why this will not be possible.</p> <p>2.9.3. It is recommended that the imagery contained in the Noise Impact Assessment Report (dated November 2024 and compiled by Demos Dracoulides), which displays the noise contours in context of the affected area are amended to overlay with the latest aerial photography instead. In this manner it will be clearer which existing (and planned in certain instances) urban/development footprints will be located in certain noise contours and the revealed implications thereof, as per the said study.</p> <p>2.9.4. It is indicated in the Noise Impact Assessment Report (dated November 2024 and compiled by Demos Dracoulides) that certain consultations between the various stakeholders associated with all</p>	<p>2.9.</p> <p>2.9.1. Noted. Comments were obtained from the CoCT Air Quality Unit and are included under comment nr. 327 (dated 13 Dec 2024). Comments were obtained from DEA&DP Directorate Air Quality (dated 19 December 2024) and included under comment number 335 in this report.</p> <p>2.9.2. Response from EAP: The Noise IA stipulates the need for the development of mitigation measures and proposes passive Noise mitigation such as noise insulation on existing residential dwellings and noise-sensitive buildings (schools, hospitals, etc.) Mitigation will be considered as part of the noise management plan and includes the introduction of noise abatement measures. The responsibility for implementation and cost thereof will form part of negotiations with final receptors.</p> <p>2.9.3. Response from specialist: The imagery will be amended with a Google maps overlay as requested and inserted in the updated Noise IA.</p> <p>2.9.4. Response from EAP: it is proposed that these consultations take place and the mitigation measures, together with the implementation schedule be determined once operational, as at</p>
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the airport operations must take place, which falls outside the scope of the present noise impact study. Furthermore, it is proposed that these consultations take place and the mitigation measures, together with the implementation schedule have been determined, their effects can be quantified and the mitigated impact rating tables determined. It is therefore understood that the abovementioned will not form part of the Scoping and EIA application and will instead take place when the development reaches its operational phase. However, should this not be the case your confirmation must be provided in this regard, as this might affect the current scoping and EIA application legislated timeframes and requirements.

2.9.5. It is indicated in the Noise Impact Assessment Report (dated November 2024 and compiled by Demos Dracoulides) that the complaints and relevant aircraft related operational data should be included in the quarterly report to the authorities. The said Noise Impact Assessment Report must therefore be updated to confirm who the relevant authorities in this instance will be.

2.9.6. It is noted that no full Archaeological Impact Assessment was compiled, as only the Archaeological Scoping Report (dated October 2023 and compiled by ACRM) was provided together with the draft EIA Report. Hence, please be reminded that relevant requirements from Heritage Western Cape must be met. In this regard, it is noted from the correspondence of Heritage Western Cape (dated 23 November 2023), that certain requirements were applicable. Since, the required Heritage Impact Assessment and the Visual impact Assessment were compiled, the follow up comments from Heritage Western Cape must be provided. Please be reminded that comments obtained must be addressed and responded and proof hereof provided in the final EIA Report.

2.9.7. According to the Aviation Glint and Glare Assessment Report (dated 6 September 2024 and compiled by Future Impact (Pty) Ltd), it is recommended that the south portion of the Services Precinct be excluded from the installation of the Solar PV panels to eliminate the exposure to the Air Traffic Control Tower. Hence, please ensure that the final Spatial Development Plan (“SDP”) spatially illustrates how

that point their effects can be quantified and the mitigated impact rating tables determined.

Note this only refers to the various stakeholders associated with all the airport operations, and taking into consideration the safety and security requirements associated with these airport operations.

2.9.5. Specialist response: a footnote has been inserted in the amended Noise IA indicating the CA.

2.9.6. Response from EAP: the requirements from HWC were considered by the specialist and incorporated into the HIA. The HIA was presented at the IACom of 22 January 2025, where the case was presented and the HIA endorsed. With the amendment of the recommendations of the VIA it was found that the amendments do not materially affect the decision of HWC to endorse the HIA, and this has been communicated to HWC in order to amend their final comment in the letter and reference the latest VIA.

2.9.7. Response from EAP: The solar panels from the south portion of the Services Precinct were excluded from the proposed solar PV layout and the specialist report updated to reflect this and to accept the latest proposed solar PV layout. Refer amended Glint and Glare report in Appendix 33 of the amended draft EIAR.

		<p>this recommendation will be met/implemented. If the above recommendation will not be implemented, you must provide detailed information on why the recommendation will not be implemented. Further, inputs from the specialist who compiled the above study must provide an updated assessment based on the fact that the abovementioned recommendation that will not be met/implemented.</p> <p>2.9.8. As per the Protocol requirements, please ensure that the Civil Aviation Compliance Statement (dated November 2024 and compiled by Royal Haskoning DHV (Pty) Ltd) contains the written comment(s) as obtained from the South African Civil Aviation Authority ("SACAA"). Please be reminded that all comments obtained must be responded to and addressed and proof hereof provided.</p> <p>2.9.9. Please ensure that all relevant recommendations made by specialists, which affects the spatial layout of the proposed development are reflected in the final Site Development Plan.</p> <p>2.9.10. Please ensure that all full specialist studies clearly and conclusively indicate whether the proposed development is supported, or not, and the reasons in each case.</p> <p>2.9.11. Please ensure that all full specialist studies meet the requirements of the applicable Protocol, or Appendix 6 of the EIA Regulations, 2014 (as amended), where no Protocol exists.</p> <p>2.10. Environmental Management Programme ("EMPr") Content Requirements</p>	<p>2.9.8. EAP response: The Aviation Protocol Compliance statement prepared by NACO (Appendix 41 to the amended draft EIAR) provides the The Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Civil Aviation Installations requires "a comment, in writing, from the South African Civil Aviation Authority (SACAA), which may include inputs from the Obstacle Evaluation Committee (OEC), if appropriate, confirming no unacceptable impact on civil aviation installations". The comments received from SACAA to date does not indicate any unacceptable impact on civil installations.</p> <p>A CWA cover letter with proof of additional consultation with SACAA, explaining that the comment will be on the Aerodrome Certification process that stands separate from the EIA., has been included in the Aviation Protocol Compliance statement.</p> <p>2.9.9. Noted. Relevant recommendations by specialists that affect the SDP are incorporated into the amended SDP Revisions as needed.</p> <p>2.9.10. Noted</p> <p>2.9.11. Noted</p> <p>2.10. 2.10.1 Noted</p>
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		<p>2.10.1. Please ensure that all relevant mitigation measures, as proposed throughout the Scoping and EIA process, specialist studies and input as well as recommendations elsewhere (e.g., commenting authorities) are included in the EMPr. Given the emphasis on mitigation, as per the Climate Change Impact Assessment Report (dated November 2024 and compiled by Brundtland Consulting), please ensure that all practical mitigation measures as per the said study are included in the EMPr.</p> <p>2.10.2. Your attention is drawn to Appendix 4 of the EIA Regulations, 2014 (as amended), for the requirements with respect to the 'Content of Environmental Management Programme'. Please ensure that the final EMPr fulfil these requirements.</p> <p>2.11. EIA Report Content Requirements Your attention is drawn to Appendix 3 of the EIA Regulations, 2014 (as amended), for the requirements with respect to the 'Content of Environmental Impact Assessment Report'. Please ensure that the final EIA Report fulfil these requirements.</p> <p>2.12. Public Participation Process ("PPP") All other proof of PPP conducted to date and in terms of Regulation 41 of the EIA Regulations, 2014 (as amended), must be provided together with the final EIA Report.</p> <p>2.13. General</p> <p>2.13.1. It is hereby requested that should it at any time deem necessary to undertake another minimum commenting period of thirty (30) days, that all updated and/or revised reports and new information be written and illustrated in a different coloured text, so that readers may be aware of such specific changes.</p> <p>2.13.2. Please be aware that any changes to the development layout, as currently presented in the draft EIA Report, may in turn affect the assessment of impacts detailed in the various specialists reports and inputs. Hence, should any layout changes occur, then all specialist reports and inputs must be suitable updated to respond to such changes and/or the specialists provide confirmation that such changes do not affect the information, as presented in the relevant specialist reports and inputs. You are hereby further reminded that</p>	<p>2.10.2 Noted</p> <p>2.11. Noted</p> <p>2.12. Noted</p> <p>2.13. EAP response:</p> <p>2.13.1. All amendments to date to reports have been underlined, and this has previously been communicated to specialists and the technical team.</p> <p>2.13.2. When the SDP is amended for a new alternative, it is communicated to specialists for their consideration and assessment.</p> <p>Specialist reports are updated where required.</p>
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<p>322 & 339</p>	<p>Stephen Levetan - ENS Africa on behalf of County Fair Division of Astral Operations Limited</p>	<p>Email dated 11 December 2024:</p> <ol style="list-style-type: none"> I refer to our recent discussions where you indicated that I&APs could approach you to request an extension of time within which to comment on the Draft EIA Report and WULA Technical Report. <p>Due to several other deadlines which I have had to meet, and despite my best efforts, I'm not going to be able to meet the deadline of 13 December 2024. I accordingly request herewith an extension of time within which to do so. What complicates matters for me is that I'm supposed to be on leave from 17 December until 10 January 2025 with my first day back in office being on 13 January. I intend continuing to work on the matter over the next few days but will need to finalise and submit after my return. Accordingly I would very much appreciate an extension to close of business on Monday 20 January 2025.</p> <p>Please let me know if this will be in order.</p> <p>Email reply dated 11 December 2024:</p> <ol style="list-style-type: none"> Thanks but that's not much of an extension if one considers my circumstances. Is there no way that I can have the extra week I've asked for? Please advise. 	<p>NOTE STATUS OF ENGAGEMENT: Regular and ongoing engagements are underway, progressed to a point where principle consensus has been reached between CWA and County Fair that relocation of the breeding farm, medium to long term, is deemed the preferred solution. CWA will then acquire the County Fair property, and such relocation and acquisition will be subject to the two parties agreeing commercial terms and will be dependent on a suitable alternative farm being identified and acquired for the breeding farm. The parties agreed to work together in achieving these outcomes, medium to long term. Over the short term, noting the findings in the specialist report both the breeding farm and airport can co-exist, provided some mitigation measures are taken. The parties have agreed to draft and finalise a formal framework agreement that will be signed and be binding on both parties. The framework agreement is, at the time of this report, in the process of being drafted.</p> <p>Email response provided 11 December 2024:</p> <ol style="list-style-type: none"> Hope you are well I take note of your request and can grant you extension until close of business on 13 January 2025. <p>Email response provided 11 December 2024:</p> <ol style="list-style-type: none"> That is the extension granted to all other IAPs who have asked and already places our NEMA timeline under pressure early 2025.
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		<p>Email reply dated 11 December 2024:</p> <p>3. I understand, but the extension you've granted me means I will have to forfeit some of my leave in order to make the extended deadline of COB on 13 January. It is what it is You'll receive my comments on 13 January then.</p>	
		<p>Email dated 13 January 2025:</p> <p>1. As per our below exchange, I herewith submit my even-dated letter setting out my client's objection and comments on the Draft EIA Report and certain of the appendices thereto.</p> <p>Kindly confirm receipt.</p>	<p>Email response provided 13 January 2025:</p> <p>1. Thank you for the comments – I acknowledge receipt.</p>
		<p>Letter received via email dated 13 January 2025:</p> <p>I. We act, as you are aware, for the County Fair Division of Astral Operations Limited which entity is registered as an Interested and Affected Party, having participated through ourselves in both the pre-Application Draft Scoping Report process in December 2023 and the In-Process Draft Scoping Report process in August 2024. We have been mandated, once again, to submit comments on the Draft Environmental Impact Assessment Report on County Fair's behalf, which we do hereunder.</p> <p>II. We need to record that we find it rather unusual that it took from the December 2023 Public Participation of the pre-Application Draft Scoping Report to August 2024 for the Public Participation on the In-Process Draft Scoping Report and yet the period from then to the publication of the Draft EIA Report, was a mere 3 months during which, apparently, all the comments submitted during the Public Participation on the In-Process Draft Scoping Report were assimilated, considered by the specialists and then a voluminous Draft EIA Report comprising 712 pages and over approximately 6,000 pages of appendices, was produced. Having regard to the extensive nature of the Comments and Response Report on the In-Process Draft Scoping Report, we would have thought that a longer period would have been needed to prepare the Draft EIA Report. One is left with the impression that the Draft EIA Report was already substantially drafted</p>	<p>I. Noted</p> <p>II. The comment is noted.</p>

and one questions therefore whether adequate consideration was given to the aspects raised by I&APs during the In-Process Draft Scoping Report stage.

III. Comments on the Draft EIA Report

We propose commencing with aspects of the Comments and Responses Report (Appendix 30B) and will thereafter comment on the Draft EIA Report and will canvass certain of the specialist studies that we believe are important in order to place our client's concerns properly before yourselves, DEA&DP and DWS. We will thereafter comment on the Water Use Licence Technical Report.

Comments and Responses Report relating to our client and our letter of 23 August 2024

1. In paragraph 5.1.1 on page 114 of 324, you set out CWA's response to CWA's commitment to fostering an open and constructive dialogue with our client through the establishment of a Joint Monitoring Committee. The response states that while the Joint Monitoring Committee has not been formalized yet, in-person meetings have been held, initiated by CWA. Our client confirms that certain in-person meetings have been held. These meetings were off-the-record meetings to enable the parties to speak freely and these meetings ought not to have been reflected in what is now a public document and inasmuch as your response reflects that the response emanated from CWA themselves, they should have known better. Furthermore, the assertion that each meeting was followed up with minutes prepared and distributed by CWA, is not correct. The CWA representatives met with representatives of our client and thereafter sent through emails containing proposals for our client's consideration, but by no stretch of the imagination can these be termed "minutes".
2. In paragraph 5.2 on page 115 of 324, CWA responds to the existence of our client's adjacent laying farm. It appears that they have based this on on-line Deeds Office searches and certain Google images from around 1980. In this regard, our client's Mr Henning Olivier, who holds the position of National Production Manager – Agriculture in Astral, started working at County Fair in September 1996. At that time, he lived on the Fisantekop complex which was part of County Fair (as an independent company) at the time. Astral was only established in 2001 and the properties were transferred to Astral, as evidenced

III. Responses provided below in point form.

1. Response from CWA: There has been ongoing dialogue between the County Fair and CWA, largely through engagements initiated by CWA. These discussions have centred around development but also on matters of common interest as neighbouring properties, such as security. These engagements are meant to create a better understanding between the two parties of future plans and areas of alignment. During these engagements the requirement for the Joint Monitoring Committee was not raised as an issue. CWA is most comfortable to proceed in establishment of the committee with County Fair.
2. Response from CWA: The history of the site is noted. The statement that the two sites/developments cannot co-exist is incorrect. The specialist reports conclude that continued co-existence, noting suitable mitigation, is possible. There might be other factors that might result in a decision taken by County Fair to relocate but the airport expansion and development is not one of them.

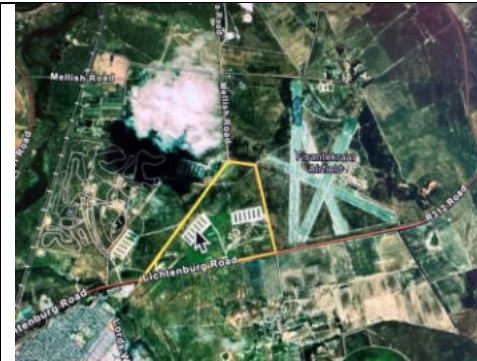
in your Deeds Office search, on 28 July 2005. The chicken houses were originally built in 1967 and have been used for broiler breeders since then. Mr Olivier has indicated that individual chicken houses were built in different areas on the complex which do not all reflect on your Google images. In the late 1970s, following the Newcastle disease outbreak, the individual chicken houses were demolished and 4 sites which are still in existence today were developed, each containing 6 chicken houses. These complexes were built by local poultry farmers who had entered into joint ventures with County Fair but unfortunately our client no longer has the Title Deeds from the previous owners. We note that CWA does not refute that our client's Fisantekop complex may have been in existence for 57 years as we alleged in our comments and their reliance on current Deeds Office printouts is therefore misplaced. The fact remains that our client's operations, adjacent to your client's proposed project, is an existing important part of our client's poultry operations in the Western Cape and simply cannot coexist adjacent to the proposed expanded airport for the reasons we have previously set out and for the further reasons that we set out herein.

3. In paragraph 5.3 on page 117 of 324, we note that CWA have stated that whilst the historical activities at the Fisantekraal airfield may not have directly impacted on our client's operations, the development plans for the airport expansion "are designed with significant consideration for the surrounding environment, including the proximity to agricultural operations." For the reasons previously stated and also set out hereunder, this statement is refuted by our client. CWA also state that the site's historical use as an aviation facility "demonstrates that aviation activities can coexist with agricultural operations when managed correctly." Unfortunately, the CWA response is not comparing apples with apples and ignores everything we have already stated regarding the proposed Site Development Plan which places all the landside activities immediately adjacent to our client's complex and, for some of these activities, only about 270m from the nearest chicken house. (The fence separating the proposed development from our client's adjacent farm is some 100m from our client's nearest chicken house) On the other hand, the landside activities of the current Fisantekraal airfield, made up of various sheds and hangers, are all located to the east of the current runways and more than 1km from our client's complex. Furthermore, the type of aircraft that presently use the Fisantekraal airfield are incomparable to the proposed aircraft that will use the expanded

3. Response from CWA: The proposed development does not impose or spill over onto the County Fair property, the historic and current shared boundary and public road reserve between the two properties remains unchanged. The specialist reports confirm that the two properties will be able to operate and co-exist in future. Given that the airport predates County Fair's facilities and operations, it should have foreseen that the possibility exists that the airport may expand at some time in the future. Again, the proposed expansion of the airport is not requiring County Fair to move any of its current structures, fences our boundaries, they can remain intact.

airport once fully developed and operational. Individual aspects of the proposed expansion project such as the development of an onsite waste water treatment works, a biodigester to produce electricity and a fuel depot, including a service station to service the general public, hotels, shopping facilities and restaurants, are all sited according to the SDP on the western side of the proposed new runway and in close proximity to our client’s complex, are simply not features at all of the existing Fisantekraal airfield. The response is therefore unacceptable to our client who continues to object to the proposed development adjacent to its existing operation. In this regard, we refer more specifically to what we set out in more detail hereunder.

4. At the end of paragraph 5.5.1 on page 120 of 324, after canvassing our client’s various objections to other proposed developments in close proximity of its Fisantekop complex (none of which have been developed to date other than the Greenville Garden Cities Development), CWA states that it “believes that the restrictive conditions the CF have done on all neighbours surrounding them have hampered and restricted development in the area.” This comment is rejected by our client with the disdain it deserves. The agreements reached with the potential developers of Bella Riva and the proposed industrial development by Glenfairprop (Pty) Ltd were negotiated based on our client’s concerns at that time and were in all respects, fair and reasonable. The advent of the highly pathogenic avian flu which first manifested in 2017 and which had a negative impact on our Fisantekop complex, has changed the environment substantially and has necessitated an increase in the biosecurity measures which our client has implemented over the past few years. Harking back, therefore, to the agreements reached in respect of those developments, does not justify CWA’s response as the changing environment is not comparable to what it was in the early 2000s when those agreements were reached. We note CWA’s reliance on the Poultry Biohazard Assessment (Appendix 39) by Dr Deryn Petty and we will deal fully therewith hereunder when dealing with the Draft EIA Report and her specialist study. Suffice to say at this juncture, our client does not believe that her assessment adequately addresses its concerns but we will expand more on this when dealing with her study hereunder.
5. In paragraph 5.11 on page 121 of 324, in dealing with the issue of noise reduction and light pollution, CWA refer to a meeting held on 22 August 2024. It is stated that “CF concluded that in an urban area such impacts are inevitable



4. Response from CWA: From a CWA perspective there is no issue or concern with CF continuing to operate this site, the specialist reports confirm that this is possible with appropriate mitigation. There might be other reasons that compel CF to relocate its operation over time, but the airport is not one of them. Landowners and developers are not precluded from signing historical agreements some 25 years ago, however there are many variables at play in a fast growing and expanding city that might very well require owners and developers to review such agreements from time to time. In any event such agreements, current or historical, are between the contracting parties and not any 3rd parties, including CWA. Having said that, we remain, within reason, sensitive of CF operations. In line with and as part of this commitment of co-existence, CWA has taken a decision to refrain from using chicken manure for the planned biodigester.
5. Response from CWA: The noise specialist report confirms no undue noise will impact on the CF land and operations, the impact should be

		<p>and should be accepted by CF." We are instructed by our client's COO for the Western Cape that this sentence is wrong. Whilst the representatives of our client and CWA conducted a further off-the-record discussion, no such concession as reflected in your report was made by our client's representatives.</p> <p>6. In paragraph 5.13 on page 122 of 324, in dealing with the issue of buffer zones, CWA state, inter alia, that the introduction of physical barriers, landscape buffers and advanced odour and noise control measures are all factors that can significantly diminish any potential impacts on the laying farm. This response, as we will demonstrate, ignores CWA's own specialist report by Dr Petty and the further statement that a standard 1000m buffer zone is necessary in this case, overlooks the fact that each development complex is unique and the buffer zone should be tailored to the specific circumstances rather than applying a one-size-fits-all approach, also conflicts with Dr Petty's assessment that a 1000m buffer zone is the norm. On the specifics of this proposed development and having regard to all the landside development immediately adjacent to our client's complex, it is difficult to conceive what form of physical barrier and landscape buffer can be implemented when the nearest facility according to the SDP is approximately 270m from our client's nearest chicken house.</p>	<p>acceptable, no concessions are therefore required, no special concessions were asked for. The Biosecurity and Poultry Health specialist recorded on page 21 of her report that..."<i>All scenarios remain below the 80dB level associated with harm to poultry and are only slightly higher than current levels.</i>"</p> <p>6. Response from CWA: The specialist report is clear, in terms of buffer zones there is no particular legislation on minimum distances but rather recommended guidelines of 1000m, and then only in the case of the distance between a poultry farm and a settlement or between a poultry farm and another poultry farm. There are no recommended guidelines of the minimum distance between an airport / industrial area and a poultry farm.</p> <p>The buffer zones typically applicable to human settlements are primarily designed to lessen the impact of the poultry farm on the quality of the surrounding environment for human settlement rather with biosecurity considerations for the poultry farm itself.</p> <p>Important to note that from the specialist report it is evident that there are historic, current and possibly greater biosecurity risks with the current four breeder flocks on the CF site being closer to each other than the recommended minimum distances prescribed.</p> <p>It would be most unfortunate for CF to attempt to use the airport development as an opportunity to address and deal with current inherent and growing biosecurity risks not associated with the airport development at all.</p> <p>Specialist response: Although a standard buffer zone is recommended for biosecurity reasons, it is clear that this is not in place on the Fisantekraal complex as it stands currently. The airport was built in 1943 and the poultry farm in the 1958. The airport thus predated the poultry farm and its situation close to the farm has always been an issue, although on a small scale. In addition, there has been urban creep which has resulted in greater traffic of both people and vehicles very close to the farm. While this may not have been</p>
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		<p>7. In paragraph 5.14 on page 123 of 324, CWA purports to respond to what was set out in our comments on the In-Process DSR relating to food processing. Our client's concern as expressed in our letter of 23 August 2024 in this regard related to food processing that involves the potential to attract flies and rodents particularly when it comes to the disposal of food waste. Our client requested far more detail as to where this food processing will occur and what it will comprise of in order to understand its potential adverse impact on our client's operations. The CWA response to this is insufficient, does not answer the requests and concerns raised by our client and is therefore unacceptable.</p> <p>8. In paragraph 5.21 starting at the bottom of page 125 of 324, you deal with the reasons why consideration could not be given to placing the landside</p>	<p>anticipated, the fact is that it has increased the risk that the farm may experience outbreaks of diseases.</p> <p>It should be noted that the Western Cape is known as a high risk area for HPAI. It appears from CF's response that there was an HPAI outbreak in the area. It is important to note that many of the farms in the Western Cape experienced repeat outbreaks on the same farms in the same areas, despite increases in biosecurity, which has led to the opinion that certain locations place poultry farms at risk regardless of any biosecurity protocols. Other transboundary diseases may exhibit the same tendencies. This needs to be borne in mind.</p> <p>Dr Lukhele is convinced that the biosecurity in place is effective in mitigating diseases, and I agree with him. The occurrence of increased traffic due to the airport on biosecurity can thus easily be mitigated with the current practices in place, since the traffic would be unlikely to involve exposure to poultry or wild birds. Although the increase in traffic and people in the area could pose a biosecurity risk, the risk of wild birds may actually be decreased by the construction of an airport as the airport itself will have to implement wild bird mitigation measures to prevent bird strikes to aircraft engines.</p> <p>The dry dams described are made to facilitate the movement of rainwater away from the site. It is not envisaged that there will be water in the dry dams except perhaps for up to 48h after a heavy downpour. They are not designed to harbour bodies of water. Thus, they will not attract the wild birds. Netting of the only open body of water will further address the issue of wild bird attraction.</p> <p>7. Response from CWA: In-flight catering will be performed by registered and reputable in-flight catering companies which are held to industry best practices and minimum standards. These companies operate globally around the world without any issues, CWA will be no different. EAP response: the food preparation areas are contained within buildings, with waste sorted and disposed of to a WMF, which will take into consideration biosecurity as one of the required measures during the registration process.</p>
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		<p>components of the proposed project on the eastern side of the new runway. You end your comment with the following sentence : “The CF farm to the west of CWA is inside the urban edge, the area is therefore earmarked for urban densification opposed to agriculture.” In this regard, we would refer you not only to our comments on Dr Petty’s study and the comments thereon by Dr Obed Lukhele, the Technical Executive : Agriculture for the Astral Group, who holds similar qualifications to Dr Petty and whose comment is set out in Annexure “A” hereto, but also to what we state hereunder in regard to food security and the provisions to preserve agricultural production in the Western Cape. We refer in this regard to paragraph 18 below.</p> <p>9. In paragraph 5.39 on page 131 of 324, GEOSS responds to our client’s concern that the incremental 9. 10% reduction in abstraction may be too little too late and its suggestion that in the event of the levels 5 persisting after the initial 10% reduction, that further reductions in excess of 10% be implemented and if low levels persist for more than 60 days, abstraction be stopped until the levels have been restored. GEOSS have agreed to this and have said that the proposed measures can be considered. We are pleased to note that our suggestion has been accepted by GEOSS and that the mitigation measures which were</p>	<p>8. Response from CWA: CWA stands by its previous comments as to why the landside developments are on the western side of the runway and not the eastern side.</p> <p>Landside layout was determined by the preferred runway orientation and airside positioning Once the runway orientation was determined (through rigorous analysis), the 3.5km runway positioning on site had to be determined. The runway could not be shifted further West, due to the physical constraints on site, such as the quarry, property boundaries and topography of the site. The runway could not be shifted further East because of space and boundary constraints. The runway had to maintain an orientation of 01-19 to allow for parallel airspace operations with Cape Town International Airport to allow for safer and more efficient airspace operations. Once the runway orientation and placement were concluded as per current proposal, vacant land existed on the West and the East for landside development. The integration of the landside development into the urban area as per planning documents (such as the CoCT 2023 MSDF) had to be evaluated and minimising the loss of productive agricultural area and avoiding and minimising impacts on the biophysical environment was also a consideration. The incremental growth and consolidated areas for the urban area also needed to be considered as per CoCT 2023 MSDF. By proposing landside development on the East of the fixed runway would have resulted on further encroachment of productive agricultural area and wetland environments and not fitting in with the MSDF. Developing on the western side of the fixed runway it would result in infill development partly inside the urban edge and aligned with the MSDF and directly adjacent to other approved and recognised urban development. Further to this the proximity to access roads and other service alternatives and the railroad favours landside development on the West.</p> <p>9. Noted.</p>
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		<p>proposed on our client's behalf have now found their way into the GEOSS assessment. We refer in this regard to paragraph 12.6 below.</p> <p>IV. Comments on the Draft EIA Report</p> <p>In commenting on the Draft EIA Report, we proposed limiting our client's comments to those areas of concern to it and the impacts of the proposed development on its operations. We will therefore not be commenting on issues which are not germane to our client's concerns. In addition, to make more sense of our client's comments to what is essentially a mammoth Draft EIA Report which is very repetitive in places, we propose dealing with our client's comments thematically and deal with the relevant specialist study at the same time.</p> <p>10. Poultry Biosecurity Assessment</p> <p>10.1. The concerns which we raised during the pre-Application Draft Scoping Report stage were responded to by you on the basis that an assessment would be procured from an appropriate expert. The Draft EIA Report relies on a Poultry Biohazard Assessment (Appendix 39) by Dr Deryn Petty. While we will deal with aspects of this assessment in the Draft EIA Report, we wish to highlight at the outset her conclusion on page 26 of the assessment where she states, inter alia, that "In my opinion, the construction of the Cape Winelands Airport will undoubtedly impact the adjacent poultry farm. ... The critical mitigation which would be important is not to use poultry manure for the biodigester as this has implications for biosecurity." (emphasis supplied) On page 23 of her assessment, in dealing with waste management and in particular the proposal to use poultry manure in a biodigester, she concludes that the transport of chicken manure to be used in the biodigester "forms a significant biosecurity risk for any poultry farm since large quantities of poultry manure from a layer farm will most certainly pose a disease risk to wild birds and poultry in the area." Considering her report as a whole, it is clear that she advises against using chicken manure in the proposed biodigester.</p> <p>10.2. On page 640 of the Draft EIA Report, you suggest that any biodigester dependent on (chicken) manure should be placed off-site and in an isolated area or omit manure as a feedstock for the onsite biodigester. That portion of the report (Chapter 8) deals with your Environmental</p>	<p>IV. Noted.</p> <p>10.</p> <p>10.1 Specialist response: the removal of the use of poultry manure on or near the site has removed this particular biosecurity concern. Adequate waste management remains important to prevent the occurrence of rodents, wild birds and other pests.</p> <p>10.2 Specialist response: the removal of the use of poultry manure on or near the site has removed this particular biosecurity concern. Adequate waste</p>
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Impact Assessment and what you have stated on page 640 is clearly informed by Dr Petty's assessment. However, notwithstanding this, your report continues to propose the use of chicken manure in regard to the proposed biodigester. We refer, for example, to page 162 where you state "the biodigester is planned to run on treated sewage water (from the on-site treatment plant) and chicken manure (from adjacent farms) / biosolids form (sic) the WWTW cultivated biomass." You also state that the "bio-fuel source will comprise ± 50 tons/day of chicken manure." You also state on the same page that the biodigester will require 3 to 5 tons of treated sewage effluent per ton of chicken manure. Another example in considering the types of sustainable energy sources being considered for the project is the use of chicken manure in the biodigester plant. We also refer you to page 198 where you deal with, inter alia, chicken manure and other feedstock for the biodigester and this is repeated on page 200 when dealing with chicken manure as a feedstock source. There are many other references in the Draft EIA Report to the use of chicken manure in the biodigester and these are all contrary to your own expert's assessment not to use chicken manure on the premises or to consider the biodigester being placed off-site.

10.3. Dr Petty refers to various international practices with regard to biosecurity and concludes on page 6 of her report that "it is prudent to suggest a buffer of at least a kilometre to reduce the impacts of the industrial development and the poultry farms on each other." She further observes that "in this case, the distance between the fence and the nearest shed (by which we assume she means chicken house) is 100m and this means that the impact of the airport and the poultry farm on each other will have to be carefully considered." On page 7 of her report, she refers to existing biosecurity concerns and suggests that there are already existing biosecurity concerns pertaining to our client's breeder farm. In this regard, we refer to the comments of Dr Lukhele set out in his letter dated 29 November 2024 (Annexure "A" hereto) where he mentions in the background section that our client's Fisantekop complex was built in 1970 and he refers to urban encroachment which led to the nearby informal human settlement being built in 1996. In this regard, we also refer to what we have set out in paragraph 2 above. Considering that our client's Fisantekop complex has been in existence for some 57 years, the

management remains important to prevent the occurrence of rodents, wild birds and other pests.

10.3 Specialist response: It is recommended for biosecurity reasons that poultry farms and especially breeder farms are in isolated areas as increased traffic results in an increased biosecurity risk. It is clear that this has been noted and taken into account already by the breeder farm. The level of vehicle and foot traffic in the area is already so high that it is moot whether any increase will result in a further decline in biosecurity, given how good the biosecurity protocols described and already in place are.

		<p>advent of urban encroachment is a more recent phenomenon which has lessened the ideal distance of 1000m but has not necessarily led to a compromise in our client’s biosecurity. As demonstrated in Annexure “A” hereto, our client’s biosecurity measures have in fact increased and, for example, open bodies of water that were on the complex were drained and, as we indicated in paragraph 7 of our letter of 7 December 2023, water which would have accumulated in the open water body on our client’s complex, now flows directly into the Mosselbank river.</p> <p>10.4. Our client notes Dr Petty’s remarks concerning access to the proposed CWA development and to her concession that in the event of the Lucullus Road option being pursued, our client’s existing operation on the Fisantekop complex will not be able to operate. This is an aspect which we have previously referred to and it is quite clear that if and when the Lucullus Road extension is to be developed, our client’s complex will need to be expropriated for such purpose. We understand, in any event, that this potential development is a fairly long way off and it seems that the extension of Mellish Road is the option that will be pursued in the foreseeable future.</p> <p>10.5. This notwithstanding, Dr Petty does mention the various considerations that pertain to the need to maintain stringent biosecurity measures on our client’s complex which need to be factored into the proposed development. Furthermore, it seems that our client and the proponents of the development make common cause regarding the need to prevent the attraction of wild birds which compromise not only our client’s biosecurity but also the safety of aircraft taking off and landing where there is a requirement to avoid strikes. So, for example, Dr Petty’s suggestion that netting should be considered over the body of water that is earmarked for the old quarry as set out on page 11 of her assessment, is supported by our client. We refer in this regard to what we set out in paragraph 9 of our letter of 7 December 2023 which may have been made available to Dr Petty and thus informed her recommendation. However, this does not seem to have found its way into the Draft EIA Report.</p>	<p>10.4 Noted</p> <p>10.5 EAP response: Mitigation Measures for Impacts on Avifaunal Species during Operational Phase includes methods to reduce available shelter including exclusion measures such as spikes, netting, panelling on ledges and holes around buildings to assist in prevention of birds taking residence on page 544 of the draft EIAR.</p> <p>The Concept Stormwater Management Plan (App 46) acknowledges that <i>Birds present a risk to aviation safety and thus preventing birds from gathering at standing water bodies will need to be addressed during the detail design. Measures that may be contemplated included netting placed over the water body or bespoke products to cover the water surface</i> (page 52).</p> <p>Specialist response:</p> <p>The dry dams described are made to facilitate the movement of rainwater away from the site. It is not envisaged that there will be water in the dry dams except perhaps for up to 48h after a heavy downpour. They are not designed to harbour bodies of water. Thus, they will not attract the wild birds. Netting</p>
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		<p>11.3. In considering the predicted noise levels once the new runway operates at full capacity, the Noise Impact Assessment states in paragraph 4.3.3 that “it is evident that the impact zones, when this capacity is reached, will extend beyond the development area boundaries, primarily towards the north and the south, but also towards the west and east.” Our client’s breeder farm complex lies to the west of the proposed CWA and there is no doubt that the noise levels will impact on our client’s breeder complex once this capacity is reached. One would have expected that inasmuch as the noise impacts on our client’s breeder stock was pertinently raised in our very first comment on this proposed development and, in the light of your response thereto, that the Noise Impact Assessment would have considered the impact on our client’s breeder stock. Instead, there is no mention whatsoever in this assessment of the impacts of the increase noise levels on our client’s breeder stock and, as we have said, the assessment appears to be limited to impacts on human beings.</p> <p>11.4. The Draft EIA Report considers the potential noise impacts in paragraph 8.5 commencing on page 447. It is interesting to note that in paragraph 8.5.1 when listing the proposed terms of reference for the noise impact assessment, you list, inter alia, that the specialist must “identify the noise-sensitive receptors, such as schools, hospitals, places of worship, etc. in the area that may be affected.” Significantly, there is no mention of our client’s adjacent breeder complex which is a noise-sensitive receptor. You</p>	<p>disturbances for the poultry, however, of concern is the occurrence of events where the decibel levels rise abruptly to 70-80db as the result of aircraft landing and taking off and then declining as quickly to the baseline. The most likely effect resulting from this is a startle response and possible pile ups and as the result of that suffocation. However, it has been shown that with careful management habituation occurs within 5 events. It is important to note that the noise level falls dramatically and night and the birds are not affected by background noise from aircraft. If there are dramatically fewer aircraft landing and taking off, there will be fewer people , fewer vehicles and likely less noise from other sources. Noise at night is viewed more negatively than during the day. Please refer to the updated Poultry Biohazard Assessment (Appendix 35 to the amended draft EIAR) for references and a more complete explanation.</p> <p>11.3 Response from EAP: The amended Noise IA has considered the Noise Impact on CF and the amended Poultry Biohazard Assessment has considered the impact of the noise on the laying stock.</p> <p>11.4 EAP response: This comment has been addressed above and in the amended Noise IA and amended Poultry Biohazard Assessment.</p>
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also list that impacts of the noise on surrounding communities and the environment must be assessed, again excluding our client's breeder complex. Most importantly, you state that the assessment must "assist the Environmental Assessment Practitioner (EAP) in addressing any relevant comments raised by stakeholders." On page 449 of the Draft EIA Report, you in fact mention amongst the issues raised during the pre-Application Scoping Phase that the effects of increased noise on livestock. The fact that the Noise Impact Assessment is totally devoid of assessing the impacts on our client's breeder stock, and thus our client's operation, impacts in turn on your assessment set out on page 636 of the Draft EIA Report when assessing the poultry biosecurity impacts, to the effect that "all scenarios remain below the 80dB level associated with harm to poultry and are only slightly higher than current levels" is therefore without any scientific basis. On the contrary, we remind you that the baseline measurement for the measuring point MP02 which was situated immediately next to our client's breeder complex, measured the daytime and night-time noise levels to be around 55dB(A) and 39dB(A) respectively. To therefore state as you do in your impact assessment that at a level of 80dB it is only slightly higher than current levels, is plainly ridiculous and is without any foundation whatsoever.

11.5. The fact remains, as set out in paragraph 4 of Annexure "A" hereto, that substantially increased noise levels negatively impact on our client's operations and if the mitigation measures proposed are simply to keep the increased noise levels to a level that can be tolerated by human beings, then your assessment as set out in the Draft EIA Report and the Noise Impact Assessment constitutes, in relation to our client's breeder stock, a fatal flaw.

12. Groundwater Impact Assessment

12.1. The Groundwater Impact Assessment (Appendix 3) has been considered particularly in regard to the concerns raised by us on our client's behalf previously. It is clear that you have not correlated between the various specialists reporting in to you as one finds, for example, the following statement in paragraph 8.1 on page 33 of this assessment when considering potential sources of pollution on groundwater, the following statement : "The final potential pollution source that needs to be

11.5 EAP response: This comment has been addressed above and in the amended Noise IA and amended Poultry Biohazard Assessment.

12. Feedback received from GEOSS:

12.1. EAP response: the preferred Alternative 3 has been amended to Alternative 4 (preferred) that excludes the chicken manure as a feed to the biodigester. As a result the Geohydrological report has been amended.

considered is the nearby biodigester. The biodigester in question will use chicken manure as a feedstock and 'digestate' from biodigesters can lead to nutrient pollution of surface and groundwater bodies if not properly managed." Surely, based on Dr Petty's report, the groundwater specialist, GEOSS, should have been advised that the biodigester will not use chicken manure as a feedstock. This lack of cohesion between the various specialists runs through the entire impact assessment.

12.2. Our client's concerns in regard to groundwater as previously set out in our earlier comments submitted on its behalf, are essentially threefold: security of supply, avoidance of over abstraction and groundwater contamination. The GEOSS assessment avers that as a result of the yield testing done there is a sustainable supply which will not impact negatively on surrounding groundwater users. In order to justify this averment and to avoid over-abstraction, they propose monitoring of water levels and abstraction levels and have put forward mitigation measures to cater for any such over-abstraction. In paragraph 8.4.2.8 commencing on page 46 of their assessment, they state that over-abstraction is likely to lead to depletion of the water levels in the area over time. They also state that this can cause damage to the aquifer and also damage to the groundwater dependent ecosystems in addition to possibly impacting on neighbouring groundwater users. They state that since there is considerable groundwater use in the area, it is essential that the boreholes to be used by the developers of the CWA are well managed and do not over-abstract to ensure that a negative impact on the neighbouring properties does not occur. They do state at the top of page 47, that the calculated yield is conservative and if abstraction is kept to the recommended rate, over-abstraction is unlikely to occur.

12.3. Groundwater level monitoring is recommended monthly to ensure that groundwater abstraction is sustainable. The monitoring will also indicate if the groundwater resource is impacted and mitigation measures can be instituted before long term impacts occur. Mitigation for over-abstraction, they say, would mean a reduction in abstraction.

12.4. In paragraph 8.4.2.9 they state that over-abstraction of groundwater from a borehole can potentially draw poorer water quality from the nearby environment into the borehole. This is likely to affect the

12.2. GEOSS response: This is correct; proper management of the groundwater resources are essential in preventing impacts on neighbouring groundwater users.

12.3. GEOSS response: This is correct.

12.4. GEOSS response: This is correct.

groundwater quality in the area in general and might affect the supply to other boreholes within the same aquifer. They conclude that this risk is valid and care should be taken to ensure that the proposed production boreholes do not draw poor quality water to the area. If abstraction is kept to the recommended rate this risk will be low but quality monitoring should be done to ensure that deterioration in quality does not occur.

12.5. In responding to the GEOSS report submitted during the In-Process Draft Scoping Report and to the GEOSS report submitted in support of the WULA Technical Report at that stage, we provided information regarding our client's own boreholes some of which had not been included in the hydrocensus conducted at that time. We also stated in paragraph 27 on page 8 of our letter dated 23 August 2024 that our client's boreholes HBH6 and HBH8 had dried up and were no longer in production. This is an indication of the vulnerability of the aquifer and the reported issues regarding the aquifer's ability to recharge and the proximity of the two CWA test boreholes to our client's adjacent breeder complex. We assume that our comments were made available to GEOSS as they respond to some of them in your Comments and Responses Report as highlighted by us above.

12.6. In table 25 to the GEOSS report, the potential impact due to the depletion of groundwater resources as a result of over-abstraction, is set out on page 61. We note that GEOSS have adopted the mitigation measure which was proposed by us on our client's behalf in order to mitigate against over-abstraction. This is a pleasing outcome and enjoys our client's support.

12.7. You deal with the potential geohydrological impacts in paragraph 8.3 of the Draft EIA Report commencing on page 379. By and large, you have relied on the GEOSS assessment (Appendix 3) and the mitigation measures recommended by GEOSS have found their way into Tables 63 and 64 of the Draft EIA Report which includes the suggested mitigation measure proposed by us on our client's behalf as referred to in paragraph 12.6 above. In Table 70, you list on page 413 that the Groundwater Monitoring Action Plan must be included as an annexure to the approved

12.5. GEOSS response: GEOSS was made aware of the comments made in the letter dated 23 August 2024 and formulated responses which were submitted to PHS Consulting in a letter dated 26 August 2024. Additional information regarding the CF boreholes was then included in the hydrocensus section of the Groundwater Impact Assessment Report. GEOSS is further aware of the two dry boreholes in the vicinity of the CWA boreholes. The boreholes in this area have been installed into the fractured aquifer which may display heterogenous characteristics in the fracture network over relatively short distances. Despite this, monitoring measures have been recommended to prevent over-abstraction of the regional aquifer.

12.6. Comment noted.

12.7. GEOSS response: An official Groundwater Monitoring Action Plan has not yet been compiled, and this will be done if the development is approved. The reason for doing so is that there could still be possible revisions to the SDP of the development due to environmental requirements. Should the development be approved, compilation and implementation of a Groundwater Management Plan will be made mandatory. The plan will then be compiled with all the available information. GEOSS has, however, compiled a proposed Groundwater Monitoring Programme in Chapter 12 of the Groundwater Impact Assessment Report.

		<p>EMP. We have considered Appendix 43B which are the EMPr annexures. There is no Groundwater Monitoring Action Plan included therein.</p> <p>12.8. In Table 72 on page 416, again based on the GEOSS assessment, the following impact is mentioned: “the agents used to extinguish the fires consist primarily of foams, other additives to stabilize, ensure readiness, and allow for longevity of extinguishing agents. These additives contain perfluoro chemicals (PFCs) that remain stable for long durations of time in the environment (Cheng et al, 2009).” The recommended mitigation measure for routine burns and training purposes could make use of biodegradable fuels which once burned minimize the impact on groundwater. We are aware of the fact that PFCs internationally are being outlawed because of the persistent nature and ability to contaminate groundwater. We would therefore suggest that in addition to the mitigation measures suggested by GEOSS and contained in your table, that a sentence be added instructing CWA not to use PFCs for this purpose.</p> <p>13. Visual Impact Assessment</p> <p>13.1. The Visual Impact Assessment Report (Appendix 15) (VIA) and the Draft EIA Report from page 556 onwards both concentrate on the possible visual impact of the CWA development on the rural setting in which it is proposed to be developed. Various views are dealt with and these are not of any real concern to our client. However, the issue of lighting is very much an area of great concern to our client particularly for the reasons set out in paragraph 5 of Annexure “A” hereto.</p> <p>13.2. The VIA deals with the visual impacts of lights at night in paragraph 6.2(iv) on page 111 and makes the statement that the visual impacts of light at night will be a “notable Cumulative visual impact of the proposed CWA development.” The reasons for this are then set out in the sub-paragraphs of this particular paragraph and the specialist then recommends a host of mitigation measures in paragraph 7.3.2(c) commencing on page 124 of the VIA. Whilst all these measures are clearly supported by our client inasmuch as they are designed to minimize light pollution, the fact that the specialist did not consider the impact of light pollution on our client’s</p>	<p>EAP response: The requirement for and the details of the proposed Groundwater Monitoring Plan was included in the draft EIAR (page 427).</p> <p>12.8. GEOSS response: The GEOSS report will be updated to reflect this point.</p> <p>13. 13.1 to 13.4 Response by Filia Visual:</p> <p>The absence of a measurable and enforceable lighting proposal was also a concern to the specialist in the course of the drafting of the VIA (see also Annexure C of the VIA, under General comments re: the impact of lights at night). The associated uncertainties were addressed in two ways:</p> <ul style="list-style-type: none"> A) By using the impact assessment methodology to express unresolved uncertainties as a function of the Probability rating (thereby increasing the significance of the anticipated visual impacts) (see 8.1.1 of the VIA); B) and by calling for more detail in the form of a lighting report by an electrical engineer (complete with detailed, measurable and enforceable lighting proposals) at SDP level.
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		<p>sensitive breeder complex, is a glaring omission particularly inasmuch as it fell within the specialist's scope of work as set out in paragraph 2.3 and in particular, the following two bullet points on the top of page 11 of the VIA :</p> <ul style="list-style-type: none"> • Identification of important viewpoints and view corridors within the affected environment, including sensitive receptors; • Determination of the relative compatibility or conflict of the project within the surroundings. (emphasis supplied) <p>13.3. In the Poultry Biohazard Assessment (Appendix 39), Dr Petty deals with light pollution on page 19 and her comments read with those in paragraph 5 of Annexure "A" hereto, ought to have been made available to the VIA specialist to specifically consider this impact in determining their mitigation measures. The fact that the Poultry Biohazard Assessment is not even listed as one of the references to the VIA speaks volumes.</p> <p>13.4. In short, our client is of the view that insufficient attention by the VIA specialist and therefore accordingly your own impact assessment set out in paragraph 8.11.3 of your Draft EIA Report is lacking in this specific regard. We trust that before the Draft EIA Report is finalised for submission to the competent authority, you will arrange for the issues raised by Dr Petty, Dr Lukhele (in Annexure "A" hereto) and ourselves in previous comments made on the public participation phases of this application, will be adequately addressed with specific reference to the impact that the bright lighting of the proposed CWA development and its surrounds will have on our client's sensitive breeder complex.</p>	<p>That said, existing lighting mitigation measures already address some of the objector's concerns. For instance:</p> <ul style="list-style-type: none"> - The Urban Design Guidelines and the Landscape Guidelines documents for the overall development called for at SDP approval stage are both obliged to include further detail in their proposals regarding lighting, supported by the Lighting guidelines in Section 7.3.2.c.; - These guidelines note, for example that the negative impacts of night lighting should be mitigated by ensuring the specification of low level 'bollard' type lights or post lights along roads; motion-activated security lighting; the use of LED's and warm light emitting luminaires; the specification of fully shielded and directional light sources etc. - All future SDP plans submitted for approval must include a detailed Lighting proposal (see notes under 7.3.1.b.iv.). - And the Overall Lighting report called for at SDP stage will provide detailed information at the site planning approvals level, at which point the objectors will have another opportunity to provide comment and input. - Under 7.3.1.c. the VIA also calls for a lighting audit to be conducted by the Environmental Control Officer (ECO) at the end of each Construction phase to ensure that all lighting related mitigation measures are adhered to and successfully implemented. Additionally, the ECO must monitor use of light and levels of light pollution by means of regular spot-checks, to be included in monthly compliance reporting (see 7.3.3.a.ii.). - The VIA calls for Construction activities to be limited to daylight hours to prevent visual impact of lights at night (see also 7.3.4.a.xi.). <p>After receiving comments from I&APs, the visual specialist consulted the project team and met with the CWA inhouse engineer to obtain more detailed information regarding their lighting proposal at this time.</p> <ul style="list-style-type: none"> - It is not expected that the lights associated with the airfield will affect the breeder complex directly. This is due to topographical variation (the ground slopes away westward increasing Visual Absorption Capacity for receptors), the design of the lights associated with the airfield itself (i.e. direction of luminaires, their height off the ground etc.), and the fact that the visible
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			<p>elements (e.g.; buildings) within the General Aviation Precinct and the Airport Terminal Precinct will screen the breeder complex and prevent line of sight.</p> <ul style="list-style-type: none"> - It is the lighting installations associated with the General Aviation Precinct and the Airport Terminal Precinct that are therefore of concern to the County fair facilities. - The CWA development is committed to a “green” agenda and as such will use low energy light sources. - In the instance of street lighting, and it is confirmed that Light Emitting Diode (LED) light sources will be specified exclusively. LED lighting is energized by direct current electricity and hence no flickering will take place. - To compliment the affinity for long wave length light in broiler breeders, the street lights in the area of the Broiler Farm shall be equipped with “warm” white LED light sources. - The two key metrics used for the measurement of light are luminous intensity and illuminance, and these should not be conflated. - The light-induced stress that is caused by illuminance levels of 10 lux and more will be addressed by ensuring that all street lights in the Broiler Farm area are installed in such a manner that the focus point will be away from the breeder complex. - Luminaires will be asymmetric in type and, in addition, cut-off louvres will be deployed where required. - The illuminance levels that may be caused by these lights will be well below 10 lux. - The CWA engineer has supported the VIA’s remedial measures related to the directionality of luminaires by ensuring that the focus point is angled away from the breeder complex. This can be demonstrated in the lighting reports at SDP level. - If so required, the height of the relevant street lights along the western property boundary and distances between the light poles will be adjusted to further ensure that the effect of the lights will be negligible. This can be demonstrated in the lighting reports at SDP level. It will however not be
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		<p>14. Air Quality Impact Assessment</p> <p>14.1. In paragraph 1.3.2(vii) of the Air Quality Impact Assessment (Appendix 4) reference is made to the proposed biodigester and the specialist refers to the fact that the plant will utilise the available chicken manure in the project area as well as the treated effluent water. It is clear that this specialist was not informed of the recommendation by Dr Petty not to use chicken manure in the proposed biodigester and the reference to the treated effluent water is clearly a reference to the onsite WWTW. In paragraph 1.3.2(viii) the specialist refers to the two options relating to sewage treatment and by now you are well aware of our client's preference for the proposed CWA project's sewage to be pumped to the existing Fisantekraal WWTW. You also have our views regarding an onsite</p>	<p>possible to switch these street lights off as the road needs to remain well-lit before a vehicle enters this section of road.</p> <p>The VIA will correct the oversights identified by the objector by:</p> <ul style="list-style-type: none"> - Including the breeder complex as a sensitive receptor in the VIA; - The project description will be updated to include further detail on the lighting proposal (obtained during this response to comment stage of the EIA process). - Re-considering the visual impact assessment to include the assessment of the visual impact of lighting on the birds explicitly, and as necessary; - Consulting the Poultry Biohazard Assessment in the drafting of the final VIA (and listing Dr Petty's report in the references). - Consulting Dr Lukhele's report in the drafting of the final VIA (it will also be listed in the references). - The mitigation measures relating to the call for lighting reports at SDP stage will be reconsidered and adjusted if necessary, in the final review of the VIA. - Lighting mitigation measures to be applied at EIA stage will include specific guidelines and requirements for the development edge in question (i.e. the western edge of the General Aviation Precinct and the south western corner of the Airport Terminal Precinct). <p>14.</p> <p>14.1 EAP response: The use of chicken manure has been removed from the project scope. Treated effluent water is required for the biodigester on site and remains part of the scope. The proposed on-site WWTW remains part of the scope with an emergency connection to the Fisantekraal WWTW.</p>
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WWTW and the fact that it will in all probability attract flies and possibly wild birds and rodents, all of which will be in close proximity to our breeder complex and thus will compromise our client's biosecurity.

14.2. In regard to the construction phase and the dust that will be generated as a result, we note the proposed mitigation measures set out on page 446 of the Draft EIA Report amongst which is to apply wet suppression on the main site roads but we see no reference to the addition of emulsions to the water to be sprayed. We note that the Draft EIA Report fails to mention the recommendation set out in paragraph 4.1.1 on page 4-3 of the assessment that dust "emissions can be reduced further to approximately 90% with the use of dust suppression chemicals." We understand from other matters in which we are involved that it is good practice to add emulsions to the water to be sprayed onto roads, stockpiles and the like as the emulsion helps form a hard outer crust which prevents wind blown dust on to neighbouring sites. Taking into account the extreme closeness of the proposed CWA project and in particular the landside facilities, our client requires that emulsions be added to the water suppression to minimize the dust fallout on its adjacent breeder complex.

14.3. On page 2-2 of this assessment in dealing with the White Paper on National Policy on Airports and Air Space Management, the author refers to the provision that "airport owners are responsible for planning and implementing actions designed to reduce the effect of air pollution on residents of the surrounding area." It is clear that considering the assessment as a whole, the impact on residents (i.e. humans) has been considered and not the impact on animals such as our client's breeder stock. Further examples of this are found in paragraphs 2.6.1.3 and 2.6.2.2 which deal with the impacts of certain gasses which will pollute the air quality in the area. There is only an oblique reference to animal toxicological studies in the first of these paragraphs.

14.4. In considering the impact ratings in paragraph 6 commencing on page 6-1 of the assessment, we note that while the specialist considers the sensitivity in the immediate vicinity of the site as being low "since there

14.2 EAP response:

The Air Quality Impact Assessment report states: *The achievable dust control efficiency with wet suppression for materials handling and unpaved roads is 75%. The unpaved road emissions can be reduced further to approximately 90% with the use of dust suppression chemicals.*

Response by specialist: Regarding dust deposition impacts, these are addressed by the recommended mitigation and monitoring in the AQIA. Amongst the various mitigation measures, it is recommended to give preference to routes and stockpile positioning away from the western site boundary, as well as to reduce the frequency of disturbance of stockpiles, in addition to the wet suppression. It is also stated that dust monitoring along the western boundary of the site, which includes the County Fair location, should be conducted on a monthly basis during construction and to be reported quarterly to the authorities. If the monitoring indicates that 70% of residential level is exceeded at the County Fair monitoring location, then the addition of emulsions to the water spraying can be introduced.

14.3 Response from EAP: a specialist report aimed at addressing the concerns of CF was specifically commissioned for this purpose, therefor consideration of the effect of Air Quality impacts can be found in the amended Poultry Biohazard Assessment.

14.4 Response from EAP: a specialist report aimed at addressing the concerns of CF was specifically commissioned for this purpose, therefor consideration

		<p>are no existing residential areas bordering the CWA airport site” no mention is made of our client’s adjacent breeder complex and the impact that dust and other 13 air quality features will have on our client’s breeder stock, or for that matter, on our client’s staff, some of whom reside permanently on the complex. This then informed your own assessment in the Draft EIA Report and the fact that the specialist has not considered the impact on our client’s adjacent sensitive breeder complex, constitutes a fatal flaw in our client’s view.</p> <p>15. Bird Strike Risk Assessment</p> <p>15.1. We have considered the Bird Strike Risk Assessment (Appendix 37) and it would seem that for obvious reasons CWA and our client make common cause on the need to avoid wild birds being attracted to the development site. In the conclusion on page 21 of the assessment, the specialist indicates that “special attention should be given to managing the Wastewater Treatment Works (WWTW), its expansion, and the surrounding livestock feedlots and lawn cultivation areas. Additionally, the large open water body to the southeast of the airfield requires careful oversight.” These two cautionary features are then dealt with in paragraph 8.17 of the Draft EIA Report commencing on page 615 and are reflected in the second and third bullet points in paragraph 8.17.3 on page 629.</p> <p>15.2. In regard to the proposed on-site WWTW you are well aware of our client’s total objection thereto not only for the reason that such WWTW will attract wild birds, but also flies and our client has expressed the view that the option of pumping sewage to the existing Fisantekraal WWTW is its preference. This was mentioned by us in paragraph 11 of our letter dated 7 December 2023 and our client’s stance has not changed. We would have thought that CWA would have made common cause with our client on this aspect but it appears that they have not done so.</p> <p>15.3. We assume that the reference to the large open water body to the southeast of the airfield is a reference to the old quarry which is intended to be used for stormwater storage. In this regard, we refer to what we have set out above in paragraph 10.5.</p>	<p>of the effect of Air Quality impacts can be found in the amended Poultry Biohazard Assessment.</p> <p>15.</p> <p>15.1 Noted</p> <p>15.2 EAP response: The proposed on-site WWTW remains part of the scope with an additional connection to the Fisantekraal WWTW. This is the preferred option to allow enough treated wastewater for non-potable use, thus decreasing the need for potable.</p> <p>15.3 EAP response: The large open water body referred to southeast of the CWA is a dam adjacent to the R304, indicated as FARM DAM WITH HIGH BIRD DIVERSITY and a blue dot in Figure 4 of the Bird Strike Risk Assessment. It is therefore not the quarry intended to be used for stormwater storage.</p>
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15.4. In the fourth bullet in paragraph 8.17.3 of the Draft EIA Report you recommend that “effective management will necessitate engagement with landowners in the vicinity to mitigate the attractiveness of agricultural and farming activities to birds.” In this regard, CWA will find a willing participant in our client.

16. Socio-economic Impact Assessment

16.1. Our client does not dispute that the creation of the expanded airport from a socio-economic point of view will uplift the area and create job opportunities for the local population. However, the specialist has at no stage consulted with our client with a view to considering the negative

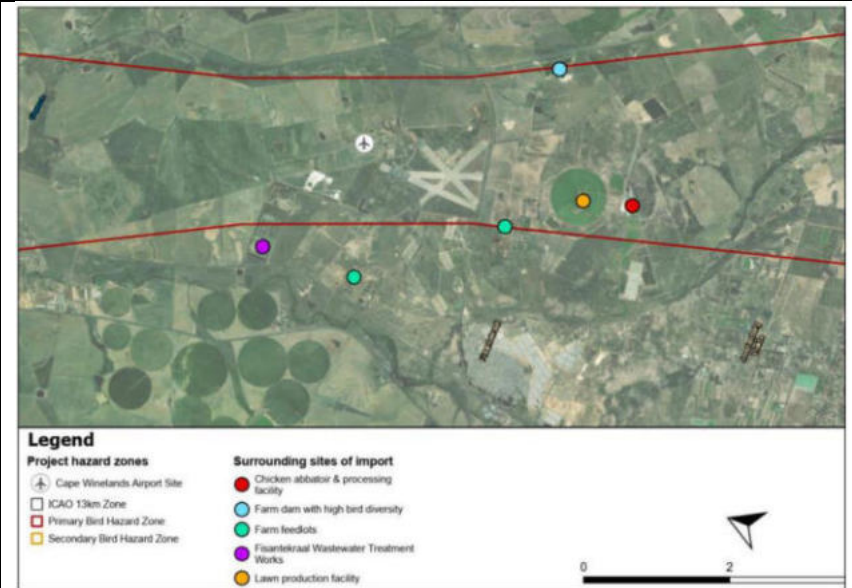


Figure 4: High risk activities in proximity to the proposed airport expansion activity.

15.4 Noted

16. Response from Multi-purpose Business Solutions:

16.1. The Socio-Economic Assessment (Section 6.4) included information on the permanent workforce at County Fair and current operations contributing

socio-economic impact which the proposed development will have on our client and in particular, on its employees. As indicated in paragraph 2 of our letter of 7 December 2023, 14 there is a total of 79 permanent employee positions on our client's complex and we advised where the workers were drawn from. We indicated that the specialist had not considered our client's employees' position in the report prepared for the pre-Application Draft Scoping Report and expressed the view that perhaps this will be taken into account when the full report for the EIA was prepared. In this regard, you stated in response to our comment that employment details provided "have been communicated to the socio-economic specialist for consideration in his Scoping and IA Reports." It is clear to us that despite your having referred our comments to the specialist, this assessment only refers to our client peripherally and does not in any way consider the possible loss of employment to our client's employees if our client's breeder complex were to be forced to close down.

16.2. We also indicated in paragraph 3 of our letter of 7 December 2023 that our client's operations on its breeder complex accounts for some 38% of our client's total laying stock in the Western Cape. We also indicated in paragraph 1 of that letter the economic value of the broiler chicks produced on our client's breeder complex and the socio-economic specialist does not even refer to this valuable contribution to the Western Cape's economy and food security at all.

16.3. You deal with the potential socio-economic impacts in paragraph 8.10 of your Draft EIA Report and you state in paragraph 8.10.1 thereof that "the analysis of primary inputs includes information collected from interviews with key stakeholders and/or representatives of stakeholder groups that are affected directly or indirectly by the proposed development. ... Where applicable, I&APs will be identified for further consultation to obtain additional information for inclusion. These parties may include, ..., surrounding landowners, ..." Having regard not only to the comments we raised in our letter of 7 December 2023 and our response thereto as set out in paragraph 15.1 thereof, we record that no interviews with our client or its employees have taken place and regard being had to what we

38% of the total laying stock. The final report will include comments more specifically related to County Fair.

CWA's expansion is not anticipated to lead to the closure of the County Fair breeder complex. County Fair has options that can be discussed and negotiated with CWA. One mitigation option is to identify a "no development zone", if practically possible, with conditions attached thereto. A second mitigation option is a potential type of offset where CWA can acquire the County Fair land parcel to extend the CWA development if practically feasible. Once again, County Fair and CWA need to engage and determine the feasibility of an offset beneficial to both parties, i.e., identifying land that would be suitable in scope to house the relocation of the County Fair operations. There would be terms and conditions attached thereto should the parties agree. This engagement has been requested with CF.

Should either of the mitigation options be considered plausible in the long term, County Fair will not suffer any net job losses as its operations will not close down.

16.2. Please refer to the response provided in 16.1.

16.3. CWA response: We believed the input in previous submissions as part of the environmental process sufficient to understand the concerns. Interviews are done at the specialist's discretion (i.e. if further information or clarification is required) and are not formally part of the PPP in the EIA process. Interviews with employees are not relevant as they are not specific to the subject property for which the EIA is being prepared and would be an internal matter. The EIA process provides a platform for I&AF to express concerns and provide input on various matters, including socio-economic impacts. As indicated, interviews with stakeholders are not a statutory requirement. The assertion that this is a fatal flaw is therefore incorrect.

have set out in paragraph 15.2 thereof, this represents a fatal flaw in this assessment and your reflection thereof in the Draft EIA Report.

17. Agro-ecosystem Impact Assessment

17.1. While this assessment mainly concerns the agricultural potential of the development site from a crop growing perspective, it does in paragraph 5.2.10 commencing on page 26 deal with livestock farming under item (c) on page 28. Conspicuous by its absence, is any reference to our client's adjacent breeder complex and this is probably understandable as the specialist's specific terms of reference set out in paragraph 2 on page 3 excluded any reference to our client's complex.

17.2. In dealing with the concept of the impact of the proposed development on food security in item (b) of paragraph 5.3.2, on page 30, there is absolutely no mention of the impact of the proposed development on the aspect of food security in connection with our client's breeder operation which will be negatively impacted by the proposed development. The fact that this has not been covered by this impact assessment probably cannot be blamed on the specialist inasmuch as it was not included in his terms of reference.

17.

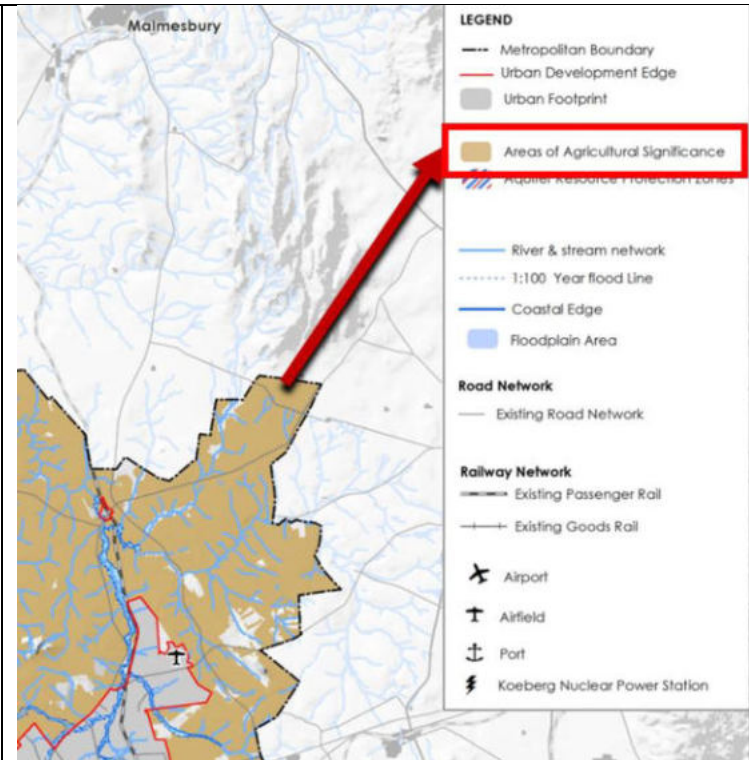
17.1. – 17.3. Response from Agri Informatics: In an Agro-ecosystem Assessment (A-EA), the main focus is on the temporary or permanent loss of irreplaceable agricultural resources. A secondary focus should be on activities that could impact on surrounding agricultural activities such as the CF operations to the West of the development area. The omission of specific reference to this operation is explained by the following facts:

1. The CF operation has a long history of co-existence with the Cape Winelands (ex Fisantekraal) Airport;
2. The potential impact of the expansion of the CWA on CF relates to aspects such as noise, pollution, etc. which was deemed to be beyond the scope of the A-EA, but was expected to be duly addressed in other specialist studies;
3. Poultry facilities in general, are not regarded as a geographically limited activity, despite having specific environmental /spatial requirements. This implies that such facilities can be re-located to negate any negative impact on production or food security;
4. Relocation of the CF operation was assumed as inevitable at some point in future, due to urban and infrastructure development plans, unrelated to the CWA development.

17.2 & 17.3. Response from H & A Planning: This statement operates under the assumption that the breeder complex may be forced to shut down. However, that is not the case. The complex can continue to operate alongside CWA with the necessary mitigation measures. In the long term, relocation may become unavoidable, as Greenville is expected to expand directly to the South, and, as highlighted by this I&AP, the future extension of Lucullus Road will result in an expropriation.

		<p>17.3. We note that in paragraph 8.12 on page 580 of the Draft EIA Report you specifically mention as one of the issues raised during the pre-Application Scoping Phase PPP that “impacts on nearby poultry facilities which supply affordable protein” were considered in this impact assessment. Having considered this assessment, which is devoid of any reference to the nearby poultry facilities, this statement on your part is palpably wrong.</p> <p>18. CWA in the context of Spatial Policy and Land Use Rights</p> <p>18.1. This study (Appendix 40) to the Draft EIA Report covers many of the spatial policies at National, Regional, Metropolitan and District levels and addresses, inter alia, the question of need and desirability. Whilst our client doesn’t join issue with this study per se, we do comment as follows thereon.</p> <p>18.2. Towards the end of paragraph 6.1.3 on page 18 of the study when considering the question as to whether the community / area needs the CWA, the following statement is made: “The development is carefully addressing environmental concerns, land use conflicts, and ensuring community involvement in decision-making.” For reasons set out in this letter and our previous letters, our client disputes that the development “is carefully addressing environmental concerns” and “land use conflicts”.</p> <p>18.3. In dealing with desirability in paragraph 6.2 commencing on page 18 and location factors in paragraph 6.2.1, the specialist states in the third bullet at the top of page 19 that “by distributing passenger traffic across two airports, road congestion around the airports would be reduced, making it easier for passengers to reach their flights on time instead of funnelling passengers via the N2 / R300 highways.” On a personal note, the writer hereof has on occasion conducted consultations at the County Fair head office in Muldersvlei. To get there, one takes the N1 and the R304 turnoff (which would be one of the routes to get to the CWA). The journey with current traffic conditions on the N1 takes 40 minutes from the City centre. On the other hand, it takes on average 15 to 20 minutes from the City centre to the CTIA. Accordingly, this observation by the specialist is</p>	<p>Nevertheless, relocation—potentially up to 200 kilometres away—will allow the business to continue operations, in accordance with County Fair’s written, signed agreement with the developer of Bella Riva. Whether the breeder complex remains in its current location with appropriate mitigation measures or relocates as a long-term solution, there will be no negative impact on food security. Based on latest information available the breeder complex will not be forced to relocate based on impacts from the proposed CWA development, but rather on other factors such as urban creep. The two parties are engaged in discussions and hopeful to reach an agreement soon.</p> <p>18.</p> <p>18.1. Noted</p> <p>18.2. Response from H & A Planning: See responses above (as added to by other specialists).</p> <p>The argument is without evidence. The CWA application is following due process as prescribed in NEMA and the COCT Municipal Planning Bylaw. The WC DEA&DP and CoCT are the ultimate decision makers in respect of environmental and land use respectively.</p> <p>18.3. Response from H & A Planning: The anecdotal point raised is in respect of the Cape Town CBD’s position relative to the two airports. However, the opening bullet in this section of Appendix 40 refers the Blaauwberg and Northern Districts of Cape Town and municipalities like Swartland, Bergrivier, Drakenstein, Stellenbosch, Breede Valley and Witzenberg. As development expands north and northeast from Cape Town, increasing pressure is placed on the N1 and N2 road network as travellers must travel further, and longer, to reach CTIA. It is self-evident that should an additional 5 million passengers travel to CTIA it will make it easier for passengers to reach their flights on time. The choice that passengers will exercise in selecting which airport to use will be, amongst others, based on their location relative to the airport.</p>
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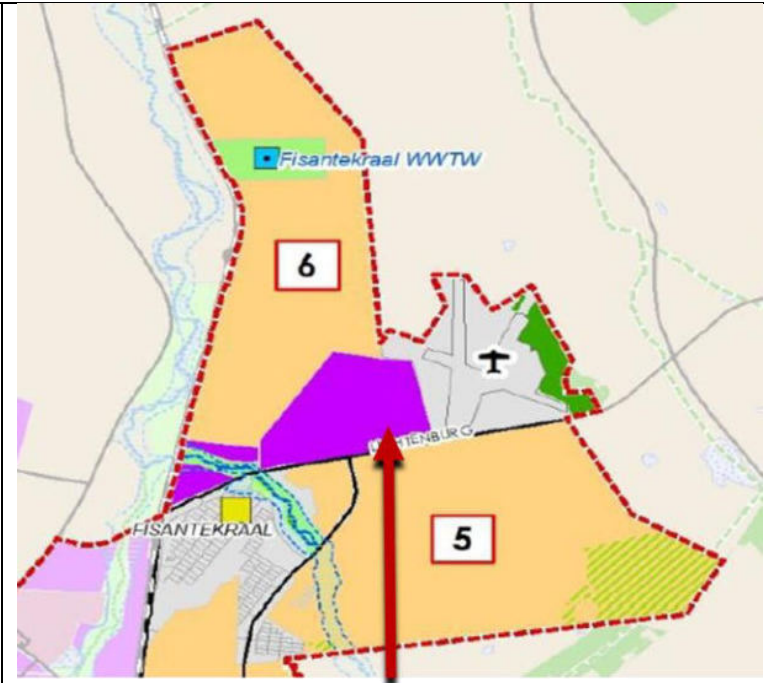
		<p>questioned. That said, the funnelling of passengers from the northern suburbs of Cape Town and areas such as Paarl and Stellenbosch to the CWA, might alleviate some of the traffic congestion around the CTIA but it certainly would not be so the other way. This comment also applies to the second bullet on page 20.</p> <p>18.4. In paragraph 12 commencing on page 29 of this study, the City of Cape Town Metropolitan Spatial Development Framework (MSDF) 2023 is dealt with. In paragraph 12.2 on page 30, reference is made to the MSDF Spatial Strategy 2 and it is recorded that this strategy is to “manage urban growth, and create a balance between urban development, food security & environmental protection.” In Table 4 on page 33 of the study, reference is made to Policy 18 which is stated to be to “increase efforts to protect and enhance natural resources such as biodiversity networks and agricultural/rural land at all levels of government in partnership with the public and private sector.” Table 4 goes on to set out what the strategic intent of Policy 18 is and lists, inter alia, “the protection of Areas of Agricultural Significance through the implementation of the Urban Development Edge” (UDE) and “to protect agricultural areas and existing farmed areas from urban encroachment, and support urban agriculture to promote food security and mitigate increased food prices.” Finally, Table 4 lists, inter alia, some implementation intents one of which is to “proactively plan and manage areas within and beyond the urban development edge and prevent urban encroachment and unlawful use in agricultural areas.”</p> <p>18.5. The study concludes on page 37 that the proposed CWA landside development does not encroach on areas of agricultural significance and this is disputed by our client for reasons set out herein and in particular, for the reasons set out in paragraph 15.2 above read with the referred to paragraphs in our letter of 7 December 2023. As we shall demonstrate below, this study and your Draft EIA Report pays lip service to the concept of food security.</p>	<p>18.4. Noted.</p> <p>18.5. Response from H & A Planning: County Fair's argument that the CWA landside development encroaches on Areas of Agricultural Significance is incorrect. Page 33, paragraph 12.3 of the study (App 40), discusses the MSDF's Thematic Maps, with areas of agricultural significance illustrated in Figure 17, Map 5c, on page 37.</p>
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MSDF 2023 (accent added – red arrow showing areas of agricultural significance)

The MSDF’s map of Areas of Agricultural Significance (light brown colour) clearly shows the CWA landside development not encroaching on areas of agricultural significance.

Contrary to this I&AP’s perspective, even the County Fair site itself is not classified as an Area of Agricultural Significance in the MSDF. Instead, it is designated as an Incremental Growth and Consolidation Area within the Urban Edge. Furthermore, the Northern District Plan identifies the County Fair site as a potential area for industrial development.



Northern District Plan 2023 (accent added – red arrow showing location of County Fair)

The broader context of food security indicates that the proposed development's impact on the County Fair breeder complex is not significant. With the implementation of necessary mitigation measures, the breeder facility can coexist with the development. However, long-term relocation may become inevitable as Greenville expands southward. As noted by this I&AP, the future extension of Lucullus Road will likely lead to expropriation. Nevertheless, relocation—potentially up to 200 kilometers away—would enable the business to continue operations, as outlined in County Fair's written agreement with the developer of Bella Riva.

		<p>18.6. In the Draft EIA Report, the concept of food security is dealt with in a number of places. In paragraph 4.3 which deals with the policy frameworks applicable to the proposed development, the MSDF 2023 is referred to on pages 124 and 125 and the Spatial Strategy 2 referred to in paragraph 17.4 above is repeated on page 125. It is furthermore referenced in paragraph 8.12 on pages 580 and 581. Here, the emphasis is on the loss of agricultural land to the proposed CWA development but no mention whatsoever is made of the negative impact of the proposed development on our client's breeder complex. Instead, the concept of food security is dealt with in the context of wheat production.</p>	<p>Whether the breeder complex remains at its current location with mitigation measures in place or relocates as a long-term solution, there will be no adverse impact on food security.</p> <p>The impact on food security related to the land used for the airport itself is comprehensively addressed in Appendix 28 of the Agro-Ecosystem Impact Assessment.</p> <p>18.6. Response from H & A Planning: The aim of a policy frameworks section is to show alignment with the various policy frameworks, including the MSDF 2023. The objective of this section is not to discuss site related impacts dealt with in the EIA and Specialist Studies. The EIR ties these components together.</p> <p>Response from Agri Informatics: In reference to the CF concern about food security, the following figures should be noted to provide perspective to the CF operation:</p> <ol style="list-style-type: none"> 6. The respondent indicates that the Fisantekop complex contributes some 38% of CF's broilers in the Western Cape; 7. CF is a subsidiary of Astral foods, which contributes ±34% of Astral's national production (Astra Annual Report 2023). 8. SAPA reports 2.282 million tonnes of poultry meat products (including imports) for South Africa in 2022, of which 0.563 million tonnes (25%) were produced by Astra (Astra Annual Report 2023). 9. The poultry industry contributes 56.0% of red and white meat protein consumed in the country. 10. SA imported 373 049 tonnes (16%) of poultry meat in 2022. 11. The contribution of the Fisantekop complex to the annual poultry meat consumption in SA is therefore calculated as 38% of 34% of 25% = 3.2%. 12. While this figure is certainly not insignificant, it is small relative to imports, which have to be regulated by import levies to protect local producers as poultry meat can be imported at lower cost than local production.
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		<p>18.7. In Table 119 commencing on page 610 of the Draft EIA Report, references are made to the possible impact on food security due to the risk of water scarcity. Then in Table 135 commencing on page 646 of the Draft EIA Report, which deals with a summary of issues raised by I&APs during the previous rounds of public participation, food security is dealt with on page 648. It is then referred to in passing on page 663 and finally in your opinion on page 695 where you refer to the fact that agro-ecosystem study found the perceived loss of agricultural land and associated food security as being acceptable.</p> <p>18.8. These fleeting references to food security simply do not grapple with the concept at all. Whilst food security is not defined in any of the policies and spatial development frameworks, the MSDF 2023 does provide some insight into what the concept is about. Planning for food security is one of the key policies of the MSDF 2023. Under Spatial Strategy 2, one of the means of achieving this strategy is through appropriately management land development impacts on natural resources such as agricultural areas of significance. The policy seems to approach agricultural activities as encompassing both crops and animal production and states 17 “support developments permitted in respect of existing agricultural/rural zoning. In addition to the list of land uses in the DMS, the following could be considered with the intention of limiting rezoning of agricultural land away to predominantly urban land uses which should be accommodated</p>	<p>Potential disruption to the production of the Fisantekop complex of County Fair due to the CWA expansion – or otherwise – can be fully mitigated by relocation of this facility, as would become essential in the longer term, due to unrelated urban development conflicts. It may also be mitigated by increased imports. The CWA development therefore cannot be regarded as a severe threat to food security in terms of the country’s poultry meat supply.</p> <p>18.7. Response from H & A Planning: With the implementation of necessary mitigation measures, the breeder facility can coexist with the development. However, long-term relocation may become inevitable as Greenville expands southward. As noted by this I&AP, the future extension of Lucullus Road will likely lead to expropriation. Nevertheless, relocation—potentially up to 200 kilometers away—would enable the business to continue operations, as outlined in County Fair’s written agreement with the developer of Bella Riva.</p> <p>Whether the breeder complex remains at its current location with mitigation measures in place or relocates as a long-term solution, there will be no adverse impact on food security.</p> <p>Response from Agri Informatics: Please refer to the response provided in point 18.6. above.</p> <p>18.8. Response from H & A Planning: Please refer to response provided in 18.7</p> <p>Response from Agri Informatics: Please refer to the response provided in point 18.6. above.</p>
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within the UDE : activities and land uses directly relating to the primary agricultural economy, e.g. agri-processing and food processing, activities or land uses of appropriate scale that do not detract from farming or food production, that diversify farm income, and add value to locally produced products, and contributes to the enhancement of the regional space economy.”

18.9. There also seems to be a broader meaning given to the term “agriculture” in the MSDF 2023 and the focus on agri-processing and food processing throughout the document may well indicate that the City recognizes the importance of value addition to agricultural outputs. As we have indicated, the term “food security” is not explicitly defined but the MSDF 2023 emphasizes the importance of protecting agricultural areas and promoting urban agriculture to support food security. It also highlights the need to manage urban growth in a way that balances environmental protection with food security and sustainable agriculture. Finally, the MSDF 2023 supports food-sensitive planning that considers their entire food system value chain, from production and processing to distribution, access, consumption and waste management. This approach recognizes the complexity of food security and the need for a comprehensive strategy that addresses all aspects of the food system.

18.10. The term “agriculture” is a broad one and deals with the practice of growing crops and raising animals so this would include cultivating the soil, forestry and dairy farming for example. Animal husbandry, which is a branch of agriculture that focuses on the care of animals includes animal breeding, nutrition, welfare and production systems. It is clear that our client’s adjacent breeder complex is part of its broader poultry producing capacity and therefore falls under the broad definition of agriculture. The loss of the major component of its production capacity (recalling that the Fisantekop complex contributes some 38% of our client’s broilers in the Western Cape) would seriously negatively impact on food security in the Western Cape.

18.9. Response from H & A Planning:

Please refer to response provided in 18.5

Response from Agri Informatics:

Please refer to the response provided in point 18.6. above.

18.10. Response from H & A Planning:

Appendix 40 addresses the application of Spatial Policy and Land Use Rights, specifically in the context of formal Spatial Policy. The Municipal Spatial Development Framework (MSDF), which serves as the apex document for municipal planning, provides the overarching guidelines.

Assessments conducted in terms of the MSDF must adhere to its definitions. As noted, the County Fair site is not classified as an Area of Agricultural Significance in the MSDF.

The MSDF defines Areas of Agricultural Significance as “Areas of high potential and unique agricultural land worthy of long-term protection given unique production, cultural and heritage attributes. This includes land that is currently cultivated, has been cultivated within the past 10 years, has the soil potential to be cultivated or be regarded as high-value grazing land, and contributes to

		<p>Comments on the Draft EMPr</p> <p>19. We note that all of the first 101 pages of the EMPr comprise essentially a summary of the Draft EIA Report repeating all the identified impacts. It's only in paragraph 2.2 on page 101 that impact mitigation is dealt with both in the construction and operational phases. We comment briefly on this section of the EMPr as follows:</p> <p>19.1. The mitigation measures to protect against over-abstraction of groundwater and groundwater contamination are essentially a repeat of the measures recommended by GEOSS. One of these measures is that a Groundwater Management Plan is to implemented but, as we have indicated in paragraph 12.7 above, there is no Groundwater Management Plan incorporated into the appendices to the EMPr. Inasmuch as GEOSS have adopted our client's suggested mitigation measure for over-abstraction, our client believes it essential to have sight of the Groundwater Management Plan envisaged and to have an opportunity to comment thereon if need be before the Final EIA Report is submitted to the competent authority.</p> <p>19.2. In regard to air quality mitigation, we refer to what we have set out above in paragraph 14.2 regarding the adding of emulsions to the water suppression in respect of the dust fallout and the omission of an onsite WWTW as an option.</p> <p>19.3. The noise mitigation measures do not take into account what we have set out in paragraph 11 above and as such, our client believes that the EMPr is lacking in this respect.</p>	<p>food security, irrespective of extent. This can include non-arable land that supports the ecological support system.”</p> <p>As pointed out above, the County Fair site is not classified as an Area of Agricultural Significance in the MSDF.</p> <p>Response from Agri Informatics: Please refer to the response provided in point 18.6. above.</p> <p>19.</p> <p>19.1. Response from GEOSS: An official Groundwater Management Plan has not yet been compiled, and this will be done if the development is approved. GEOSS has provided a proposed Groundwater Monitoring (Management) Programme in Chapter 12 of the Groundwater Impact Assessment Report outlining recommended monitoring locations, parameters and frequencies. Comment on this section is welcome. All useful information will be collated when the final Groundwater Monitoring Programme must be submitted.</p> <p>19.2 Response from EAP: this comment has been addressed above.</p> <p>19.3 Response from EAP: this comment has been addressed above.</p>
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		<p>19.4. The lighting mitigation measures set out on pages 138 through to 140 of the EMPr, whilst being supported by our client, do not appear to be complete for the reasons set out in paragraph 13 above and by your own stipulations that :</p> <p>19.4.1. “It may therefore be necessary for an Overall Lighting Report to be called for at the Land Use Planning Approval stage, to be prepared by a suitably qualified electrical engineer”; and</p> <p>19.4.2. “The CA may therefore require some kind of simulation overlaying the contextual graphics (site photographs, 3D model or aerial imagery), which is not within the visual specialist’s expertise to generate.”</p> <p>The competent authority should therefore not approve the EMPr if these aspects are left unattended to. To authorise the EMPr when it is envisaged that, for example, an Overall Lighting Report only be called for at the Land Use Planning Approval stage, may well amount to it being too little too late especially insofar as the lighting impact on our client’s adjacent breeder complex cannot be properly assessed by the competent authority in the absence of such a report.</p> <p>19.5. In paragraph 2.2.16 commencing on page 155, you deal with poultry mitigation. Most of the mitigation measures are supported by our client save that we again repeat that the lighting and noise mitigation are insufficient inasmuch as they are based on specialist reports that did not specifically address our client’s adjacent breeder complex. We once again point out the repeated reference to poultry manure in this section when it is clear that (a) the poultry biohazard specialist, Dr Petty, has recommended that poultry manure not be used or the biodigester dependent on poultry manure be placed offsite and in an isolated area; and (b) the fact that no provision other than an onsite biodigester has been made in the SDPs.</p>	<p>19.4 Response from specialist:</p> <p>The VIA will correct the oversights identified by the objector by:</p> <ul style="list-style-type: none"> • Including the breeder complex as a sensitive receptor in the VIA; • The project description will be updated to include further detail on the lighting proposal (obtained during this response to comment stage of the EIA process). • Re-considering the visual impact assessment to include the assessment of the visual impact of lighting on the birds explicitly, and as necessary; • Consulting the Poultry Biohazard Assessment in the drafting of the final VIA (and listing Dr Petty's report in the references). • Consulting Dr Lukhele's report in the drafting of the final VIA (it will also be listed in the references). • The mitigation measures relating to the call for lighting reports at SDP stage will be reconsidered and adjusted if necessary, in the final review of the VIA. • Lighting mitigation measures to be applied at EIA stage will include specific guidelines and requirements for the development edge in question (i.e. the western edge of the General Aviation Precinct and the south western corner of the Airport Terminal Precinct). <p>Refer amended VIA Appendix 14 to amended draft EIAR.</p> <p>19.5. EAP response: Comments on the noise and lighting mitigation are addressed above.</p> <p>The updated scope of the proposed project does not include the use of poultry manure. The biodigester is located on site as indicated in the SDP.</p>
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		<p>comments were noted. As such, and after considering the WULA Technical Report (Appendix 31), we are of the view that all those comments remain valid.</p>	<p>EIA process has progressed, updated information has become available and has been considered in the responses provided here.</p> <p>5.41. Under the heading Sewerage Management and Treatment on page 20, it is noted that capacity exists at the Fisantekraal Waste Water treatment works to accept the flows from the proposed project. The fact that the network would need to be expanded is a cost that must be borne by the project proponent is not one that should impact negatively on this option being followed.</p> <p>This comment is noted. As per the Zutari Engineering Report (Revision L) three wastewater treatment options are under consideration:</p> <ul style="list-style-type: none"> • An onsite package treatment plant with an emergency rising main to the Fisantekraal Wastewater Treatment Works (WWTW); • A pump station with a rising main to the Fisantekraal WWTW; • Pump to Fisantekraal with extraction (Preferred option). <p>5.42. On page 21, the two options contemplated to service the development are set out. As stated elsewhere in these comments and indeed in our client's comments on the p-a DSR, our client opposes in the strongest terms Option 2 being the construction of an on-site sewerage treatment plant. The risks of such a plant attracting not only wild birds but flies and rodents which are all known vectors of bacteria, will seriously compromise our client's biosecurity and cannot be countenanced at all. If the project is to be authorised at all, which for obvious reasons our client opposes, our client suggests that Option 1 be the only option authorised by the competent authorities.</p> <p>As stated above the preferred option is the Optimized Sewage Treatment and Non-Potable Water Reuse Strategy. It is for noting that many airports have sewage processing systems but that these are closed systems and do not resemble the traditional sewage systems that serve towns (International Civil Aviation Organisation , n.d). As long as there are no open bodies of water and sedimentation dams, the onsite plant will have no impact on poultry. Should the development of an onsite sewage processing facility be authorised, the implementation of appropriate design and mitigation measures will ensure that biosecurity risks are effectively managed.</p>
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			<p>from the Fisantekraal community, would all lose their employment. In this regard, we refer to what we set out in this particular regard in our comments on the p-a DSR.</p> <p>Response from Multi-Purpose Business Solutions: The Socio-Economic Assessment (Section 6.4) included information on the permanent workforce at County Fair and current operations contributing 38% of the total laying stock. The final report will include comments more specifically related to County Fair.</p> <p>CWA's expansion is not anticipated to lead to the closure of the County Fair breeder complex. County Fair has options that can be discussed and negotiated with CWA. One mitigation option is to identify a "no development zone", if practically possible, with conditions attached thereto. A second mitigation option is a potential type of offset where CWA can acquire the County Fair land parcel to extend the CWA development if practically feasible. Once again, County Fair and CWA need to engage and determine the feasibility of an offset beneficial to both parties, i.e., identifying land that would be suitable in scope to house the relocation of the County Fair operations. There would be terms and conditions attached thereto should the parties agree.</p> <p>Should either of the mitigation options be considered plausible in the long term, County Fair will not suffer any net job losses as its operations will not close down.</p> <p>5.43.4. On page 141 of the report reference is made to Section 27(1)(f) and it is noted that the technical document will be updated upon receipt of the final impact assessments and quantum risk ratings. We have already dealt rather extensively with the potential for the water uses applied for in the WULA and in particular the application for an abstraction licence to negatively impact on our client's own water security and we will deal further with this aspect when the assessment phase is subjected to public comment</p> <p>Potential risks of over-abstraction and groundwater quality deterioration have been identified within both the Groundwater Impact Assessment and the WULA Geohydrological Assessment. Mitigation measures have been proposed, including those suggested by stakeholders. These measures have been accepted, incorporated into the Environmental Management Plan, and</p>
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		<p>over-abstraction. You list the significance rating as high before mitigation and low after mitigation. It remains to be seen whether this rating after mitigation is apposite. Only once there is a Groundwater Management Plan in place and proper monitoring conducted can one then assess whether the mitigation measures are working and we would urge DWS to consider these impacts as medium after mitigation for the time being. In support of this suggestion, we refer to the fact that two of our client's boreholes in close proximity to the CWA project site have already dried up.</p> <p>26. In the section dealing with the effects of climate change, the WULA Technical Report deals in paragraph 3 on page 173 and paragraph 4 on page 174 with the risks of water security and extreme heat. Both these considerations find application to our client's breeder complex in that our client relies on water not only for drinking purposes but also to cool the chicken houses during the hot summer months. Any compromise in its water supply would affect both these issues and it is for this reason that our client proposed the mitigation measure to guard against over-abstraction which was accepted and adopted by GEOSS. This important consideration and its bearing on our client's continued operations and thus on food security needs to be considered by DWS when deciding whether or not to grant the full extent of the abstraction licence applied for.</p> <p>27. In paragraph 16 of the WULA Technical Report the requirements of Section 27(1) of the National Water Act (NWA) are set out. We observe that aside from changes to some of the data relating to job creation and income projected from the operation of the CWA, and the inclusion of the results of the fresh water offset investigation by FEN Consulting, this section remains substantially the same as it was in the WULA Technical Report submitted for the In-Process Draft Scoping Report phase. As indicated in paragraph 21 above, all the comments which we made in relation to Section 27(1) of the NWA remain valid and we note that the authors of the WULA Technical Report (the EAP on the project) have not addressed the comments which we made on the In-Process Draft Scoping Report phase all of which the EAP responded to as "comment is noted". Having noted our previous comments, it is most strange that these have not been addressed in the WULA Technical Report submitted during the EIA phase.</p>	<p>however, has rated this as a low risk after mitigation as the mitigation measures include regular monitoring and continuous reductions, and an eventual ceasing of activities should monitoring deem it necessary. Due to this, the overall long-term risk is considered to be low as potential adverse effects are not allowed to run 'unchecked' before it is too late. As stated in response to Point 20, it would be in the best interest of all parties involved to establish a Groundwater Monitoring Committee to evaluate and monitor the long-term risk to all parties involved.</p> <p>26. EAP response: This comment is noted. The risks of groundwater depletion and quality deterioration due to over-abstraction were identified in the GEOSS Groundwater Impact and WULA Geohydrological Assessments. Mitigation measures were proposed, with additional measures suggested by CF during previous rounds of public consultation, which were accepted by GEOSS. These have been incorporated into the specialist assessments and the Environmental Management Plan and will be enforced as a condition of Environmental Authorisation. Their implementation will effectively mitigate the risk of over-abstraction on surrounding water users.</p> <p>27. EAP response: The concerns raised in relation to Section 27(1) of the NWA were addressed in detail in point 21 above. All received comments are carefully reviewed and responded to. Where necessary, they are incorporated into the relevant specialist and technical reports.</p>
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	<p>28. On page 202 of the WULA Technical Report, reference is made to the groundwater assessments conducted by GEOSS having considered surrounding water users. It is recorded that “the developments of interest that were noted include the County Fair chicken farm and the Fisantekraal Waste Water Treatment Works.” In addition, it is noted that each individual impact was assessed with regard to its potential cumulative impact when considered along with the other developments and the results presented in Table 36. The final sentence of this particular paragraph in the WULA Technical Report is important as it states “with implementation of mitigation measures the cumulative impacts range from very low to medium impact significance.” We refer to our remarks in paragraph 20 above and maintain that the impacts on our client’s adjacent breeder complex even with the mitigation measures properly in place, should be considered by DWS as medium.</p> <p>29. On page 212 of the WULA Technical Report, reference is made to the GEOSS Geohydrological Assessment but the wrong monitoring mitigation is reflected. GEOSS accepted and provided in their assessments that if the water level were to drop below the critical water level, abstraction will immediately be reduced by 10% and if after 30 days the level did not recover, a further 10% reduction must be implemented. If the low levels persist for more than 60 days abstraction must cease until the levels have recovered. On the contrary, the WULA Technical Report states that after the second 10% reduction, “this process will continue until the water level in the borehole is stable”. That provision no longer pertains. in Tables 27 and 28 of the GEOSS assessment forming Appendix A to the WULA Technical Report, the correct mitigation measure is reflected.</p> <p>30. Conclusion</p> <p>Based on all the foregoing, our client continues to object to the proposed CWA development as it impacts negatively on our client’s breeder complex. Our client has expressed the willingness in the past to engage with CWA but nothing meaningful from this engagement to date has been achieved. It seems to our client that the proposed development is being expedited and that the intention is to literally bulldoze the process through to obtain the requisite authorisation</p>	<p>28. Response from GEOSS: GEOSS agrees that only once monitoring is implemented can the true effect of the abstraction be observed. GEOSS, however, has rated this as a low risk after mitigation as the mitigation measures include regular monitoring and continuous reductions, and an eventual ceasing of activities should monitoring deem it necessary. Due to this, the overall long-term risk is considered to be low as potential adverse effects are not allowed to run ‘unchecked’ before it is too late. As stated in response to Point 20, it would be in the best interest of all parties involved to establish a Groundwater Monitoring Committee to evaluate and monitor the long-term risk to all parties involved.</p> <p>29. Response from EAP: This comment is noted. The correct monitoring mitigation is as follows: “If the water level in the boreholes drops below the dynamic water level. i.e. 72mbgl for CWA_BH001. and 40mbgl for CWA_BH002 abstraction will immediately be reduced by 10%. This would be for normal rainfall events. If a hydrological drought persists for more than two years, the water level can drop to above the critical water level i.e. 85mbgl for CWA_BH001 and 61mbgl for CWA_BH002. Monitoring will persist for 30 days. In the event of lowered levels persisting after the initial 10% reduction, further reductions in excess of 10% must be implemented and if the low levels persist for more than 60 days, abstraction must cease until the levels have been recovered. This process will continue until the water level in the borehole is stable.” This monitoring mitigation measure will be consistently reflected across all reports in the Final EIA.</p> <p>30. Noted</p>
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		<p>while paying scant regard to the issues raised by I&APs and in particular by our client.</p> <p>Kindly confirm receipt hereof and keep us abreast of any further phases in the public participation for this project.</p> <p><u>Annexure A – Letter by Dr Lukhele</u></p> <p>I refer to your email dated 21 November 2024 requesting my comment to Dr Deryn Petty’s Poultry Biohazard Assessment (“Appendix 39”) titled the “IMPACT OF PROPOSED DEVELOPMENT OF AN AIRPORT IN THE CAPE WINELANDS ON POULTRY BIOSECURITY AND HEALTH”.</p> <p>Background</p> <p>The Fisantekop broiler breeder farm complex is composed of four (4) sites of six (6) houses each. These sites are Fisantekop, Wheatlands, Quarryside and Vergelee and together house a total of about 162 000 birds that produce hatching eggs for County Fair, a subsidiary of Astral Operations Ltd.</p> <p>The Fisantekop complex was built in 1970. The urban encroachment got closer to the commercial farms over the years and, as a result, the near-by informal human settlement was built in 1996. The nearest site to this human settlement, which is on the West, is Quarryside that is located about 440 meters away. The closest building of the proposed Cape Wineland Airport (CWA) will be about 270 meters from Vergelee.</p> <p>Comments</p> <p>The aim of this biohazard assessment was “to investigate and as far as possible quantify the effect of a new airport on the adjacent poultry farms, focusing on those aspects that will affect the biosecurity of a poultry farm and the health of the poultry”.</p> <p>The following were key concerns raised in this biohazard assessment report:</p>	<p><u>Response by Dr Petty to Annexure A Letter</u></p> <p>Response to COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED EXPANSION OF THE CAPE WINELANDS AIRPORT ON FARMS 10/724, RE/724, 23/724, 7/942, RE/474, 3/474 AND 4/474 (DEA&DP Ref No.: 16/3/3/2/A5/20/2046/24 and DWS Ref No: WU33620)</p> <p>REF B Levetan/mhn/0532612</p> <p>These comments relate to exclusively to the report as it pertains to the report - IMPACT OF A PROPOSED DEVELOPMENT OF AN AIRPORT IN THE CAPE WINELANDS ON POULTRY BIOSECURITY AND HEALTH. Please note that the report has been updated to reflect any additional concerns.</p> <p>The terms of reference for the response it to address point 6 as well as point 8, point 10 (note chicken manure has been removed from the feed to the biodigester), point 11.2, point 11.3, Annexure A. Other experts will address other comments that are relevant to their fields of expertise. Point 8 is not relevant to my field of expertise.</p> <p>Herewith is my response.</p> <ol style="list-style-type: none"> 1. Biosecurity and the existence of a buffer zone (point 6, point 8, annexure with regards to biosecurity) Although a standard buffer zone is recommended for biosecurity reasons, it is clear that this is not in place on the Fisantekraal complex as it stands currently. The airport was built in 1943 and the poultry farm in the 1958. The airport thus predated the poultry farm and its situation close to the farm has always been an issue,
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	<p>1. “..... There are four different parent flocks in close association with each other on this complex. The distance between the breeder flocks is certainly less than recommended for good biosecurity” (page 7).</p> <p>The broiler breeder birds that are placed on each of these sites originate from County Fair’s rearing farms that are all under the health care of the in-house veterinarian. These birds, both in rearing and laying, are exposed to the same health and disease monitoring programmes. It was shown in Europe that biosecurity is complied with more in breeders (87%) and, on farms under contract with a company (82.5%) compared to independent farms (79.5%)¹.</p> <p>2. “However, it must be borne in mind that the biosecurity is already compromised by its situation close to a main road as well as a settlement” (page 27).</p> <p>The Biosecurity Procedures in Poultry Production, Chapter 6.5.1, of the OIE Terrestrial Animal Health Code was first adopted in 1982. This was at least twelve (12) years after the Fisantekop complex was built. Discouraging the location of poultry farms closer to the public roads became a relevant conceptual biosecurity phenomenon after Fisantekop was already built. The informal human settlement was established about twenty-six (26) years after the Fisantekop complex was built.</p> <p>The biosecurity risks that are associated with the main road (220 meters) and the informal human settlement (440m from Quarrieside) were mitigated through various management / operational and physical pillars of biosecurity. The anticipated fold-reductions in highly pathogenic avian influenza (HPAI) risk infections in relation to the four levels of biosecurity has been demonstrated whereby preventing access to waterbodies reduced the risk of HPAI virus entry into the farm three (3) fold, routine daily biosecurity (boot disinfection, limiting visitors, rodent control, clean feed and water) resulted in four-fold reduction, while housing reduced the risk two-fold and, all that’s been mentioned prior plus showering, no visitors and dedicated staff and equipment limiting the risk forty-four fold⁴.</p> <p>3. In Figure 2 (page 10), “The six ponds that will be developed to channel water from the site are shown; however, it is important to note that five out of six ponds are dry ponds and, as a result, will not attract birds.” It is further stated on page 11 that “Pond No. 2 is the closed quarry in the process of rehabilitation, which will hold 95,000 liters of surface water. If not carefully managed, this pond</p>	<p>although on a small scale. In addition, there has been urban creep which has resulted in greater traffic of both people and vehicles very close to the farm. While this may not have been anticipated, the fact is that it has increased the risk that the farm may experience outbreaks of diseases. It should be noted that the W Cape is known as a high risk area for HPAI. It appears from your response that there was an HPAI outbreak in the area. It is important to note that many of the farms in the W Cape experienced repeat outbreaks on the same farms in the same areas, despite increases in biosecurity which has led to the opinion that certain locations place poultry farms at risk regardless of any biosecurity protocols. Other transboundary diseases may exhibit the same tendencies. This needs to be borne in mind. Dr Lukhele is convinced that the biosecurity in place is effective in mitigating diseases and I agree with him. The occurrence of increased traffic due to the airport on biosecurity can thus easily be mitigated with the current practices in place, since the traffic would be unlikely to involve exposure to poultry or wild birds. Although the increase in traffic and people in the area can pose a biosecurity risk, the risk of wild birds may actually be decreased by the construction of an airport as the airport itself will have to implement wild bird mitigation measures. The dry dams described are made to facilitate the movement of rain water away from the site. It is not envisaged that there will be water in the dry dams except perhaps for up to 48h after a heavy downpour . They are not designed to harbour bodies of water. Thus they will not attract the wild birds. Netting of the only open body of water will further address the issue of wild bird attraction.</p> <p>With regards to point 10, it appears that the removal of the use of poultry manure on or near the site has removed this particular biosecurity concern. Adequate waste management remains important to prevent the occurrence of rodents, wild birds and other pests.</p> <p>In summary, it is recommended for biosecurity reasons that poultry farms and especially breeder farms are in isolated areas as increased traffic results in an increased biosecurity risk. It is clear that this has been noted and taken into account already by the breeder farm. The level of vehicle and foot traffic in the area is already so high that it is moot</p>
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		<p>may attract birds.” and “Figure 3 indicates that the quarry will be used for rainwater storage, and if rehabilitated, it may attract wild birds”.</p> <p>The development of the CWA closest (270m from Vergelee) to the Fisantekop complex will increase biosecurity risks due to the rain water that will accumulate in the ponds (five dry and one rehabilitated) as well as in the quarry resulting in more wild bird population drawn closer to the Fisantekop complex. Farms that are located less than 500 meters from water bodies with high number of migratory birds had higher risk of being infected with the HPAI virus⁴. The wild birds are known to carry and transmit various infectious diseases such as the HPAI. The anticipated fold-reductions in HPAI risk infections in relation to the four levels of biosecurity⁴ also applies here.</p> <p>4. Abiotic stressors such as temperature, noise and light result in compromised health (welfare), bird behaviour, growth and productivity of poultry³.</p> <p>The assessment report only made mention of the intensity (levels) of noise. The duration of noise and its ability to cause vibration was not considered. In this report, three scenarios were mentioned and it was concluded that “All scenarios remain below the 80 dB level associated with harm to poultry and are only slightly higher than current levels”.</p> <p>Small changes of 10 dB is enough to have a significant impact in inducing tonic immobility (TI) or fear duration⁵. A single short stress due to aircraft noise did not affect egg production but exposure of the birds to the noise stress for a period of three to four days reduced egg production⁵. The fear in hens was increased when exposed to noise intensity of 90 dB that was caused by trains, trucks and aircraft for one (1) hour compared to hens that were housed in the environment with 65 Db sound³.</p> <p>Vibration stress physiology is closely related to noise stress as they are both energy waves³. The location of animal farms near workshops, railways, construction sites and other such areas induce stress from ground-borne vibrations³. Sound vibrations greater than 1.0 cm s⁻¹ had a negative effect on egg production³.</p> <p>5. Lighting</p> <p>The intensity, wavelength and duration of lighting from the airport has not been quantified. A photoperiod of 23 hours of light elevated stress and fear in the</p>	<p>whether any increase will result in a further decline in biosecurity, given how good the biosecurity protocols described and already in place are.</p> <p>2. Dr Lukhele has raised several important points with respect to noise and light effects on broiler breeders. Noise is a significant factor . This factor was expanded in my report to be more specific and taking into account further input from the noise specialist Mr D Draculides . In summary, the noise maps do not show any increase in the average noise at the poultry farm that can be attributed to the aircraft . The day night average decibel level modelled taking into account the use of the runways as well as the type of aircraft and the times of the flights, is 55db in the worst case scenario. This would be unlikely to result in any disturbances for the poultry, however, of concern is the occurrence of events where the decibel levels rise abruptly to 70-80db as the result of aircraft landing and taking off and then declining as quickly to the baseline. The most likely effect resulting from this is a startle response and possible pile ups and as the result of that suffocation. However it has been shown that with careful management habituation occurs within 5 events. It is important to note that the noise level falls dramatically and night and the birds are not affected by background noise from aircraft. If there are dramatically fewer aircraft landing and taking off, there will be fewer people , fewer vehicles and likely less noise from other sources. Noise at night is viewed more negatively than during the day. Please refer to the updated poultry report for references and a more complete explanation.</p> <p>Vibration</p> <p>Although this has been raised as an issue, careful reading of the relevant reference will reveal that the vibrations referred to are largely as the result of roads and equipment in the house and refer to a situation where the birds themselves are subject to prolonged vibration. This is not really relevant to the vibration which may be caused by a burst of sound . I refer the my updated report for a fuller explanation.</p> <p>Light</p> <p>As explained previously any extraneous sources of light at night will affect the circadian rhythm of the birds and therefore the egg laying. However, the number of aircraft landing and taking off at night is less</p>
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	<p>Ross 308 broiler³. This prolonged exposure of birds to light disrupted the circadian clock gene expression and the microbiome diversity in the caeca in the Hy-line layer chicken³ and, has thus negatively impacted egg production and gut health of these birds.</p> <p>The flicker sensitivity of domestic poultry induces discomfort and stress within the frequency range of 39-71 Hz and under the light intensity of 10-1 000 Lux³. The long wavelength (nm) of 660nm (red light) increased egg production in Cobb broiler breeders^{3,6}.</p> <p>Conclusion</p> <p>The proximity of the Fisantekop broiler breeder complex farm to the public road and to the informal settlement are not due to poor compliance with conceptual biosecurity by County Fair. The informal settlement was established about twenty-six (26) years after the farm was built. The Biosecurity Procedures in Poultry Production as outlined by the World Organisation for Animal Health (WOAH, formerly OIE) was only adopted twelve (12) years after building the farm. Developing an airport next to the Fisantekop laying farm will continuously expose the birds to abiotic stressors and compromise their health and welfare. In addition, the shortcomings mentioned earlier in conceptual biosecurity will be compounded. The latter effect has been demonstrated through the fold-reductions in HPAI risk infections in relation to the four levels of biosecurity, namely, prevention of access to waterbodies, housing, routine biosecurity and high biosecurity level that includes showering, no visitors as well as dedicated staff and equipment.</p> <p>The abiotic stressors can lead to negative changes in metabolism, bird behaviour and immunity that result in compromised bird health, welfare and even mortality. All components of light and noise must be addressed. This includes vibrations and duration of noise as well as the intensity, wavelength and duration of lighting from the CWA have not been quantified or made-mention of in the biohazard assessment report.</p> <p>The prevailing winds during the construction phase requires more attention to help alleviate the impact of dust, noise and other abiotic risk factors.</p> <p>References</p>	<p>than 3 and these before 11pm and therefore the need for lights in the parking area adjacent to the airport is similarly reduced. Hooding the light sources and directing the light away from the poultry farm, lights with motion sensors can all be used to achieve this goal. It must be noted that many breeder farms have spotlights on at night and as long as the light does not shine directly into the poultry house, it appears to have no effect. I refer to the final updated Visual Impact assessment for the proposed Cape Winelands Airport Development (F Smit) for more detail.</p> <p>Mr Levetan and Dr Lukhele are to be thanks for raising relevant points and allowing me to clarify these issues.</p>
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		<p>Email dated 28 February 2025:</p> <ol style="list-style-type: none"> 1. I write to inform you that today is my last day at ENS and that I am retiring from the firm. <p>However, and by arrangement with the firm, I will continue to be involved albeit that my colleague, James Brand (in copy) will process the matter further on my client’s behalf. Kindly therefore amend your records and include James on all your future communications, with a copy to me on my private email address which is [REDACTED]</p> <p>Kindly confirm receipt and that your records have been duly amended.</p>	<p>Email response provided 28 February 2025:</p> <ol style="list-style-type: none"> 1. Thank you Stephen for the email and all the best with the retirement. <p>We will amend the register accordingly</p>
323	Lance Mcbain-Charles – DEADP Directorate: Waste Management	<p>Email dated 12 December 2024:</p> <ol style="list-style-type: none"> 1. Attached the correspondence associated with the “WASTE MANAGEMENT PLAN THAT FORMS PART OF THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED EXPANSION OF THE CAPE WINELANDS AIRPORT, DURBANVILLE, WESTERN CAPE.” <p>Letter received via email dated 12 December 2024:</p> <ol style="list-style-type: none"> 2. COMMENT ON THE DRAFT WASTE MANAGEMENT PLAN THAT FORMS PART OF THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED 	<p>Email response provided 12 December 2024:</p> <ol style="list-style-type: none"> 1. Thank you for the email and comments received. <p><u>Responses:</u></p> <ol style="list-style-type: none"> 2.

		<p>EXPANSION OF THE CAPE WINELANDS AIRPORT, DURBANVILLE, WESTERN CAPE</p> <p>2.1. The documentation dated 13 November 2024, as received electronically by the Department of Environmental Affairs and Development Planning: Sub-Directorate: Waste Management Licensing (hereafter “the Department”) on 13 November 2024, refers.</p> <p>2.2. The draft Waste Management Plan that forms part of the Environmental Management Programme (EMPr), as Annexure 43B, has been reviewed.</p> <p>2.3. The Department is satisfied with the level of detail of the waste management measures within the draft Waste Management Plan. The proponent must ensure to derive standard operating procedures (SOPs) that are aligned to this plan, as well as the provisions of the applicable National Norms and Standards of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) (NEM:WA).</p> <p>2.4. Refer to page 651 of the draft EIA report, where it is stated that “a waste management plan forms part of the norms and standards submission”. Please be advised a separate registration application for the norms and standards will have to be submitted to the Department using the prescribed form.</p> <p>2.5. Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.</p> <p>2.6. The Department reserves the right to revise initial comments and request further information based on the information received.</p>	<p>2.1 Noted</p> <p>2.2 Noted</p> <p>2.3 The comment and requirement are noted.</p> <p>2.4 The requirement is noted and will be complied with.</p> <p>2.5 Noted</p> <p>2.6 Noted</p>
324	Sean Bradshaw - ACSA	<p>Email dated 12 December 2024:</p> <p>1. Thank you for the opportunity to comment on the proposed expansion of Cape Winelands Airport’s Draft EIA Report (DEA&DP ref: 16/3/3/2/A5/20/2046/24), Please find attached ACSA’s comments, If you can kindly confirm receipt,</p> <p>Letter received via email dated 12 December 2024:</p>	<p>Email response provided 12 December 2024:</p> <p>1. Thank you for the email. I acknowledge receipt of the attached comments.</p>

		<p>COMMENT ON PROPOSED EXPANSION OF CAPE WINELANDS AIRPORT, DEA&DP REFERENCE NO. 161313121A512012046124 & DWS REF NO: WU33620</p> <p>The In-Process Draft Environmental Impact Assessment Report dated 12th November 2024, appendices and letter informing I&APs of the above project, dated 13th November 2024, refers.</p> <p>We submit the following comments related to the In-Process Draft Environmental Impact Assessment Report and various appendices:</p> <ol style="list-style-type: none"> 1. Appendix 21: CWA Airspace and Capacity Study: <ol style="list-style-type: none"> 1.1. The report Executive Summary makes the following claim: "The Cape Winelands Airport (FAWN) will be able to operate independently of Cape Town International Airport (FACT). Therefore, any concerns of impact to operations from/to FACT are mitigated'. <p>Our response: There is no mention in the report on the capacity implications for FACT. This impact on CT IA needs to be assessed, as in terms of the criterion set out in the National Environmental Management Act ("NEMA"), the person responsible for considering the application for environmental authorisation must consider any feasible and reasonable alternatives to the proposed activity. Therefore, the proposed development must be measured against existing capacity and the implications thereof.</p> 	<ol style="list-style-type: none"> 1. <ol style="list-style-type: none"> 1.1. Response from CWA: The statement in the Executive Summary that "The Cape Winelands Airport (FAWN) will be able to operate independently of Cape Town International Airport (FACT), mitigating any concerns of operational impact to/from FACT" is supported by the fact that the existing air traffic management (ATM) capacity at FACT is primarily a function of runway capacity rather than airspace capacity. <p>The report's preliminary assessment of airspace design and traffic flow, including the results of the Fast-Time Simulation study, has demonstrated that the airspace can accommodate operations at both airports without compromising safety or efficiency, i.e. capacity. The independence of FAWN's operations ensures that FACT's runway capacity and operational efficiency remain unaffected, addressing concerns about potential impacts. It therefore follows that capacity at FACT will not be negatively impacted due to operations of FAWN. It was also noted in par 106 of the report that ATNS – the national airspace regulator and Air Traffic Navigation Service Provider – contributed to the development of the CWA Concept of Operations and did not identify any constraints to airspace capacity, assuming both airports are in operation.</p> <p>The coexistence of FAWN and FACT is feasible and aligns with sustainable development principles. FAWN will help alleviate pressure at FACT by providing its own additional capacity for general aviation, cargo, and other non-scheduled operations, thereby allowing these operators to reposition their operations to FAWN, enabling additional capacity for scheduled</p>
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1.2. The report's Executive Summary states: "CWA has commenced with an Airport Task Force that includes a large contingent of stakeholders. It is recommended (if not already done) that smaller work groups are formed to deal with specific concerns that will help determine the airspace design requirements."

Our response: ACSA has not been invited to provide detailed input to this work group. The failure to include ACSA in such a working group materially affects the consultation process. NEMA requires that any comments of an organ of state that is seized with the administration of the law relating to the activity (airports in this case) must be considered. In the absence of ACSA being invited into the work group, ACSA is unable to properly exercise its rights to be consulted as an interested and affected party and to make inputs into the process.

operations at FACT, allowing FACT to focus on its core role as the region's primary international gateway.

The development of FAWN introduces a complementary alternative for aviation operations within the region. This diversification enhancing resilience and efficiency in the regional aviation system.

The establishment of FAWN represents a strategic opportunity to enhance South Africa's aviation infrastructure while addressing the growing demand for air services in a sustainable and regionally balanced manner.

In this context, the recent public statement by ACSA's CEO, Mpumi Mpofu, that "the new airport will not pose a threat to the existing operations of Cape Town International, and that the two airports can coexist and complement each other" (<https://search.app/qlaE85Qh1b7aN4G56>) is welcomed by the Applicant.

1.2. Response from CWA: Numerous airspace meetings have taken place – directly with ACSA as well as collectively with industry – where ACSA participated.

ACSA has participated and has been represented in 6 (six) Airspace Task Force related meetings on the following dates:

- 23 March 2023 – virtual meeting with industry
- 22 June 2023 – in person meeting directly with CWA
- 18 Sept 2023 – in person meeting directly with CWA
- 1 August 2024 – in person meeting directly with CWA
- 30 Sept 2024 – in person meeting directly with CWA and ATNS
- 1 October 2024 – in person meeting with industry

The claim in the report that "CWA has commenced with an Airport Task Force that includes a large contingent of stakeholders" is accurate and aligns with the principles of thorough consultation. While ACSA has not yet provided detailed input to this work group, it is important to note that the consultation

			<p>process is planned to be executed in several stages to ensure all relevant stakeholders have an opportunity to participate meaningfully.</p> <p>To date, three engagements have been concluded with the general aviation community as part of the initial phase – all of which ACSA was invited to attend, and of which ACSA attended one.</p> <p>The next stages of the consultation process will explicitly involve airport operators, airlines, and airline associations, where ACSA’s participation is both foreseen and welcomed. This structured, phased approach is designed to ensure that all parties, including ACSA, can provide input at the appropriate stage of the process. It must be emphasized that the airlines are the actual users of the airspace in Cape Town, while ACSA is an infrastructure provider and operator.</p> <p>After initial presentations to the National Airspace Committee (NASCOM) and the Air Traffic Management/communication navigation surveillance committee (ATM/CNS) Implementation Committee in October 2022, the process moved to the Airspace and Route Efficiency Work Group (AARE WG), where the need for broader industry engagement was identified. The AARE WG established the CWA Task Force to facilitate industry-wide consultation on CWA’s airspace requirements. Chaired by a representative from Air Traffic and Navigation Services (ATNS), the Task Force held its first meeting on 23 March 2023, with participation from key industry stakeholders. Since then, CWA has engaged directly with ACSA on multiple occasions and consulted with regional role players, including Morningstar Flying Club and Stellenbosch Flying Club, to refine airspace planning. ACSA’s involvement will be welcomed to inform the airspace design requirements. It should be noted that the Task Force was dissolved once role players agreed to use ICAO Doc 9992, the industry standard for airspace design and implementation.</p> <p>CWA remains committed to engaging with ACSA to ensure that its insights and expertise are incorporated into the process, strengthening the consultation framework and contributing to a balanced and inclusive airspace design outcome.</p>
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1.3. Page 23 of 43 bullet 51: The report states: "It is evident that most arriving and departing aircraft for FACT follow the published departures (SIDS) and arrival routes (STARS). In complying with these published route structures, aircraft are well above 3,000ft when in the vicinity of FA WN".

Our response: This is based on arrivals/departures for the current runway (01/19). The report does not consider what the implications will be when the NRR (18/36) is in operation. Neither does the report consider the second parallel runway in the Master Plan, which, for reasons motivated below in clause 2.12 below, must be assessed as part of the CWA EIA.

1.4. Page 24 of 43 bullet 60: The report states: "A further analysis of high-capacity airport environments was reviewed to see where, and if, airports were dependent on each other. Table 3 provides a summary of airports and distances together with air traffic movements. It is evident, from this summary that close proximity of FA WN to FACT is not a factor to one being dependent on the other and restricting current or future capacity".

Our response: It appears that peak hour traffic was not considered when doing this study. Peak hour capacity must be assessed and considered in order to support this claim.

1.5. Page 24 of 43 "Analysis of Other Airspace Environments": Although numerous examples of airports in close proximity are cited, these airports are not comparable to CTIA, with its unique characteristics

1.3. Response from CWA: ACSA's statement that the report does not consider the NRR is incorrect. It is included in the Executive Summary of the Airspace Study (Pg 3, point 2) that the planned runway realignment at FACT will not have an adverse impact on FAWN's operations, and vice versa. The planned FACT realignment is angled away from FAWN which will enhance the separation and independence of the two airports.

It is important to emphasize that the realignment of the primary runway at FACT is of no operational consequence, as the change in runway orientation is only 10 degrees. This minor adjustment is unlikely significantly to alter existing departure and arrival flows or aircraft altitudes in the vicinity of FAWN.

Regarding the second parallel runway in FACT's masterplan; these plans do not have any regulatory approval, nor have they gone through any form of public consultation and thus cannot be substantially considered by CWA's plans. However, the 14 nautical-mile lateral separation that currently exists between FACT and FAWN is such that even if FACT did develop a second parallel runway, it would still also be well outside of the 5 nautical-mile minimum separation as prescribed by ICAO.

1.4. Response from CWA: Peak hour traffic was considered in the study. Paragraph 18 of the study confirmed that the study considered 95 departure and 92 arrival tracks, which represents a dense traffic environment and exceeds the peak traffic at FACT.

1.5. Response from CWA: All airports have unique characteristics, and although the comparatives are not identical, they do operate in significantly busier environments than FACT, with multiple commercial airports operating within the same city. In Cape Town, FACT is the only

e.g. terrain, smaller surrounding airports, and NEM:PAA protected areas.

1.6. Page 33 of 43 bullet 95: "The reported FACT TMA capacity statement on slide 79 is inconclusive. Airspace capacity is determined by runway capacity, in the instance of the FACA TMA, it primarily serves FACT. Given that FACT has a runway capacity of 30 aircraft per hour, a TMA capacity of 35 is feasible".

Our response: Future capacity must also be considered and assessed; in the short-term, FACT runway capacity will be increased to approximately 45 ATMs per hour, and in the medium term to approximately 80 ATMs per hour. Runway capacity is however not the only factor to determine runway throughput. Other factors such as aircraft mix, aircraft type, ANSP capacity, capability, SOP's, and Airline/Pilot SOPs amongst others need to be considered.

1.7. Our general comment on this study: Several statements are made that assume in theory CTIA and CWA will be able to operate independently and will not impact on each other from an airspace point of view. If

commercial airport and thus the selected comparatives appropriately illustrate the principle that cities can and do accommodate multiple busy airports.

1.6. Response from CWA: Future capacity was assessed, and it was concluded that the two airports are sufficiently separated to allow for independent operations. ICAO prescribes a minimum 5 nautical mile for lateral separation in controlled airspace whereas FAWN and FACT are approximately 14 nautical-miles apart from each other – well exceeding the minimum lateral separation distance.

The report further concludes on page 34 of 43, bullet 105-106 that:

“The high-level review of the FACT arrival and departure tracks over FAWN indicates there is sufficient distance to permit independent operations between the two airports. Aircraft arriving and departing FACT permit sufficient vertical separation for aircraft to depart and arrive FAWN.

As capacity demands on airspace grow, the route structure can be adapted to separate the routes laterally. The adoption of vertical and lateral separation can easily be developed within the capability of the PBN requirements post 2030 and as described with respect to the ICAO Global Air Navigation Plan (GANP) and the South African National Airspace Master Plan. 106. It should be noted that ATNS (as the designated ANSP) contributed to the development of the CONOPS, it has not identified any airspace constraints to capacity with both airports in operation.

As stated in an earlier response, paragraph 18 of the study confirmed that the study considered 95 departure and 92 arrival tracks, which represents a dense traffic environment. This exceeds the peak traffic of 80 ATMS as confirmed by ACSA.

1.7. Response from CWA: The statement that "Several assumptions are made in theory that CTIA and CWA will be able to operate independently and will not impact each other from an airspace point of view" warrants

local conditions are factored into the mix, a different picture will emerge. The only way to assess this impact properly is to design the procedures/routes, conduct the necessary modeling and test them to determine the actual impact.

2. Appendix 30B: In Process Draft Comments & Responses Report:
 - 2.1. Page 5 of 324, bullet 1.1: ACSA commented on the Need and Viability of a second commercial international airport. The developer responds by stating "it's crucial to prepare for future demand proactively, and that "Globally competitive cities rely on unrestricted air access, which significantly improves its competitiveness and attractiveness. It's also important to note that almost all medium-sized cities around the world have more than one airport to manage their growing air traffic

clarification. The assertion that factoring in "local conditions" would produce a different outcome is unsubstantiated, as these "local conditions" have not been tabled or adequately defined.

Despite several requests for further information on these "local conditions," no specific factors have been shared with the Cape Winelands Airport (CWA) team or included in discussions to date. Without clear identification of these factors, it is not possible to assess their relevance or determine how they might alter the theoretical conclusions presented in the report.

As mentioned above, the recent public statement by ACSA's CEO that "the new airport will not pose a threat to the existing operations of Cape Town International, and that the two airports can coexist and complement each other" (<https://search.app/qaE85Qh1b7aN4G56>) is welcomed by the Applicant.

Furthermore, as indicated above, the airspace and capacity report's preliminary assessment of airspace design and traffic flow, including the results of the Fast-Time Simulation study, has demonstrated that the airspace can accommodate operations at both airports without compromising safety or efficiency, i.e. capacity.

CWA remains committed to a transparent, collaborative and data driven approach, and it encourages stakeholders to specify these "local conditions" so that they can be factored into the ongoing planning, modelling, and testing processes.

2.
 - 2.1. Response from CWA: The expansion of CWA is undertaken in a responsible and efficient manner and is guided by sound economic drivers. The comparatives are not meant to provide identical scenarios as all airports have unique characteristics, differences and bespoke growth strategies. In Cape Town, FACT is the only commercial airport and thus the selected comparatives appropriately illustrate the principle that

demands and to provide redundancy. For instance, cities like Milan have Malpensa and Linate airports, while Washington, D.C., operates with both Dulles and Reagan National airports. Similarly, London is served by multiple airports, including Heathrow, Gatwick, and Stansted. Even Windhoek, the capital of Namibia, operates two airports: Hosea Kutako International and Eros Airport. These examples demonstrate that a second airport can significantly enhance a city's connectivity and resilience, contributing to its long-term growth and sustainability. Most major cities in the world have more than one international airport. With two major airports in the Western Cape, South Africa becomes more accessible to both domestic and international tourism, trade and investment. "

Our response to this is that we acknowledge the fundamental principle that unrestricted air access is crucial to enhancing regional competitiveness. However, we believe that any expansion must be undertaken in a responsible and efficient manner, guided by sound economic drivers. The argument for a second airport, as presented, does not provide a sufficiently compelling case. The examples cited, such as Greater Milan, Washington, and London, represent cities with much larger feeder areas than the Cape Town Municipality and its surrounding regions. These cities also benefit from significantly different economic growth trajectories.

Additionally, a closer examination of the distances between the airports mentioned reveals considerable disparities. For instance, the straight-line distance between Malpensa and Linate is 47 km, between Dulles and Reagan National is 37 km, and between Hosea Kutako International and Eros Airport is 47 km. These distances are notably larger than those between the existing Cape Town International Airport and CWA (only 22km), further complicating the direct applicability of these examples to the local context.

From an economic size and population point of view, these regions and countries cannot be compared to the Cape Town Region which is substantially smaller. The larger London area has a population of 10 million and the CoCT metro approximately 4.8 million. Importantly the GDP per Capita in Cape Town is only R1 24 000 in comparison with

cities can and do accommodate multiple busy airports in the same proximity. The intention of the examples was to provide the principle of a second airport. CWA understands that these examples may not be a precise comparison however it firmly points to the strategic importance of second airports. It is important to consider the key principles which drive the need for a second airport in Cape Town, based on its own merits and regional characteristics and nuances.

Distance to an alternate airport for a diversion is a direct determinant of the quantum of reserve fuel to be carried on board each flight. From this perspective, the fact that CWA is closer to CTIA is more advantageous as this means that the reserve fuel savings for airlines will be greater than it would have been had CWA been further away from CTIA. Close proximity is seen as a major benefit.

The examples offered are to show the principle of the value of the second airport. A socio-economic impact study forms part of the EIA impact assessment.

The growth trajectory for Cape Town has been exceptional and comparative to international growth trajectories elsewhere such as Europe. Since 2021 16 airlines announced 18 new routes in and out of Cape Town with the Africa continent alone seeing compounded annual passenger growth of 10% since 2016.

All indications are that this growth will continue in the foreseeable future, provided sufficient investment in air access infrastructure is made to support and accommodate this growth. CTIA has not seen any significant investments in airport capacity over the last 15 years since 2010. All indications are that CTIA will only be able to introduce significant new infrastructure expansions over the next 3-5 years. This represents a 20 year period of no significant investment and the impact can already be seen where CTIA's lack of capacity informs decisions as to the hosting of large scale events i.e. the G20 Summit in 2025.

<https://www.news24.com/fin24/economy/g20-summit-joburg-pips-cape-town-ethekweni-as-host-city-thanks-to-airports-hotels-20241028>.

London which is 10 times more, at R1 250 000 per capita. According to Sabre MIDT data, the propensity to fly in the greater London Area is 5 times more than in the Cape Town metro. Windhoek cannot be compared with the Cape Town region. HKIA is the international airport while Eros is a General Aviation Airport, combined they only handle approximately 1 MPPA. In addition, these two airports both belong to NAC (Namibia Airports Company).

Many regions and countries have "single international airports", and so the argument to have two international airports within a 22km radius competing for the same market does not make sense. Even in South Africa, and Africa, with limited surface access, international airports are geographically separated by substantial distances. The ability or implied lack thereof of Cape Town to support future bids for international events with a single international airport does not make sense given that South Africa has successfully held numerous international events such as the FIFA and Rugby World Cups.

2.2. Page 7 of 324, bullet 1.1.1: On determining the need and desirability of a second commercial international airport, ACSA states that it first needs to be determined whether the existing Cape Town International Airport has existing or future capacity constraints. We explain in detail that CT IA can in fact accommodate the expected doubling of air traffic by 2050, and that there is no need for a second international airport in Cape Town.

It is concerning that ACSA continues to raise concerns about competition while ACSA has enjoyed being a monopoly in the Western Cape for the past 30 years. The fact that CWA and CTIA are geographically close enhances CWA's desirability as a planning alternate aerodrome, improves the value proposition to the passengers and the industry at large. CWA as a planning alternate, in close proximity to CWA, also improves route profitability of airlines flying into CTIA. The value proposition to airlines with flights inbound to CPT, with CWA as their closer alternate airport is that:

Their fuel upload for flights into CTIA will be less

- in turn there will be fuel burn savings (lower cost benefit)
- the weight savings due to the lower fuel uptake can be used to carry additional payload in the form of passengers or cargo (additional revenue benefit)
- with lower fuel burn, airlines also reduce their carbon emissions on that route. (better for the environment and carbon tax/offset savings benefit).

All of the above leads to greener skies and a more profitable route for the airline.

The implication of this shift in route profitability is the retention of current routes and the introduction of new routes for CTIA, primarily benefitting ACSA CTIA.

2.2. Response from CWA: CWA has adopted an integrated planning approach and remains acutely aware of CTIA's development plans. CWA has not and does not dispute that CTIA has regulatory approval for the new realigned runway, terminal expansion projects and apron developments. It is important to note that CWA's approach towards scheduled traffic growth is one of measured conservatism, reflected in CWA's traffic forecast which considers growth for both airports. For CTIA to reach 2050 air traffic levels, CTIA will have to make further capital investments

The developer responds by stating "It is not fait accompli that CTIA will be able to develop the airport to this level of capacity. To reach the capacity of 45MMPA, CTIA will require a new second parallel runway (in addition to the new realigned runway), multiple terminal expansions, apron development, and so forth. None of these carry development rights or regulatory approvals at this stage. These development programmes will be subject to development planning and regulatory processes... ." and that "it's premature for ACSA to say that CTIA can grow to 45MPPA, when the required rights and regulatory approvals have not been obtained to substantiate such a statement. "

Our response is that, whilst the second parallel runway still requires regulatory approval, the new realigned runway, terminal expansion projects, and apron developments either enjoy regulatory (EIA) approval, or do not require further regulatory approval since they occur on the existing airport development footprint. The capacity of these developments, which are approved and enjoy development rights, will more than cater for the expected growth in demand over the next 15 years. Therefore, as part of approved developments, these developments must be considered in relation to the current assessment of CWA.

Infrastructure capacity beyond this demand and time horizon (i.e. the second parallel runway) will only be applied for once capacity demand triggers are achieved, which will take CTIA to its ultimate capacity of 45 MPPA as per CTIA's Master Plan.

CTIA can accommodate the expected doubling of air traffic by 2050, we have the necessary approvals in place, and reiterate that there is no need nor desirability for a second international airport in Cape Town.

2.3. Page 7 of 324, bullet 1.1.1: The developer states that "Capacity cannot be the sole criterion for the assessment of a second airport'. The developer also goes on to list a series of value-add propositions that

beyond the current planned investment programme mentioned above, which, based on ACSA's comments below, will only provide capacity for 5 to 10 years. This is why CWA highlights that ACSA would need to follow the required regulatory approval processes to develop the airport to reach capacity of 45MMPA – ACSA's current planned and approved infrastructure plans does not enable the 45MMPA which is well beyond 2050. Furthermore, as required by the regulatory framework, ACSA reviews its investment programme periodically. This represents many opportunities ahead of 2050 for ACSA. ACSA is able to proactively consider market shifts, changing requirements, the benefits brought on stream by CWA amongst others, and ensure that no over-investment is made., Both airports are able to grow sustainably as demonstrated in the traffic forecast. For as long as ACSA does not overinvest, ACSA will never be unsustainable.

2.3. Response from CWA: CWA reiterates that capacity is but one criterion and in addition it would argue that it is not the most important. CWA understands why this would be considered as the most important criterion to ACSA, as ACSA's revenue model heavily relies on ACSA

are opinions rather than tangible criteria that support the need and desirability of a second international airport in Cape Town.

Whilst capacity may not be the sole criterion, it is the most important.

Value-add propositions for CWA listed by the developer include:

- "Adding airport capacity and redundancy to the airport system in Cape Town and the region". Our response: no additional capacity nor redundancy is required. CTIA has the necessary systems and infrastructure in place to ensure redundancy. With respect to diversions, diversions are minimized at CTIA through existing operational procedures.
- "Enabling increased route profitability for all airlines flying into CTIA due to reduced fuel reserves, reduced fuel consumption, increased payload." Our response: The studies supporting this assumption remain vague and speculative.
- "The expansion of CWA will require a workforce for all parts of the airport value chain, representing a massive recruitment

investing in infrastructure (creating capacity) to generate revenue. The revenue generated from tariff charges for infrastructure development, being one of ACSA's biggest revenue streams. Taking a more holistic and strategic approach to infrastructure development is what is required to ensure the sustainability of not only ACSA but also the airline and broader industry. ACSA has enjoyed a monopoly for 30 years. It appears from ACSA's comments that it wishes to protect this monopoly, and does not welcome competition into the market. CWA will introduce efficiency into the market, unlocking revenue and cost saving opportunities for airlines with direct flights inbound to CTIA. In addition to this, CWA unlocks "greener" skies by allowing airlines to reduce their carbon emissions by 5% per flight as an alternate airport. Efficiency, cost, and reduced environmental impacts are key considerations which CWA considers fundamental to the sustainability of the industry at large. Furthermore, CWA will offer Cape Town a strategic asset as a reliever airport.

- ACSA's view on adding capacity and redundancy into the region, referred to as "value-add propositions" and its position that these are less important than capacity, is inwardly focused. As an example, the prospect that the airline industry stands to increase route profitability for all airlines flying into CTIA, reduce fuel reserves, reduce fuel consumption and increase their payload should be considered by ACSA as vitally important, especially within the context of the competitive environment within which airlines operate.
- The studies are not vague or speculative. It is important to note that this has been validated by the airlines with which CWA has engaged. The purpose of the analysis is to demonstrate commercial advantages for Domestic, Regional and International airlines in using CWA as alternate airport in the future.
 - Independent study conducted by PACE Aerospace Engineers GMBH, see Appendix 15. The following key components were assessed:

opportunity, i.e. there will be large volumes of vacancies" Our response: Whether new opportunities will be created is unclear; it is more likely that there will be a lateral shift of economic opportunities, whilst limited overall growth in the greater Cape Town area. Airport's themselves don't create demand, and so the development of CWA is not going to trigger new demand, it will merely shift demand between two airports.

2.4. Page 9 of 324, bullet 1.1.2: The developer states: "Cape Town International Airport (CTIA) currently serves as the primary gateway to Cape Town. While CTIA is a well established airport, the city has enjoyed tremendous growth in tourism, semigration and population, placing pressure on its transport systems. Although CTIA has future expansion plans to increase its capacity, there are multiple links in the value chain that can only be addressed by the introduction of a second airport, which once addressed will result in a net-gain in terms of air travel for the region. "

Our response to this: We agree that tourism in the region is growing. The reality however is that 350000 additional international passengers were processed in the 2024 FY in comparison with the previous peak in the 2019 FY, which equates to approx. 950 pax per day. This number has minimal impact on existing transportation systems. Population growth attributable to local immigration and

- Weight savings
- Fuel Burn Savings
- Payload Opportunity
- Reduced Carbon Emissions

- In addition to this CWA engaged both domestic and international airlines

- Response from Multipurpose Business Solutions: Response from Multipurpose Business Solutions: The last bullet, is more of a comment and not a question. Given the market growth identified by other specialists, it is unclear how the shift will occur as it would likely result in a net positive employment impact. A no-growth scenario underpins the "shifting" or "displacement" in demand. It is difficult to imagine that no growth will occur, and a 100% displacement scenario will unfold. Other commissioned studies have demonstrated a demand for a secondary (alternate) airport. This assertion by ACSA may be too extreme to consider as a plausible outcome of the development of CWA.

2.4. Response from CWA:

The comment highlighted by ACSA formed part of a broader discussion. The context of which was about the future air traffic growth, under the heading "CWA's air traffic development for scheduled commercial traffic". It is within this context that CWA highlighted future pressures on an existing strained transport system.

The City and the Province adopt a structured approach to infrastructure planning - CWA cannot presume where urgent investment is required as described by ACSA.

The simplified calculation of 350 000 additional international passengers equating to 950 passengers per day is problematic. It is well known that Cape Town air traffic is highly seasonal, with both peak days and peak hours during peak days. Given the long haul and remote location of Cape Town as well as curfews i.e. Europe this trend will not change. Airlines not being able to be

natural increase (births) under lower LSM levels will strain surface transport systems; this is where urgent investment is required.

2.5. Page 9 of 324, bullet 1.1.2: The developer states: "the primary reason for CWA implementing such infrastructure is not just about scheduled passenger growth at its own airport — it is to specifically unlock the benefits enabled to the airline sector by introducing a much closer alternate airport for the purposes of diversions and fuel planning on flights inbound to CTIA from day one of the airport opening — as the same level of runway capability as CTIA is required in order to do so."

Our response to this statement: The number of diversions at CTIA is extremely limited. In 2023 there were only 2 runway closures. This does not provide adequate justification for the need and desirability of a second international airport in Cape Town. The secondary cross runway accommodated narrow- body aircraft, and displaced thresholds were implemented to accommodate wide-body aircraft, thereby reducing delays and operational impact.

accommodated on required slot times will inevitably look/revert to alternative destinations. It also represents a material vulnerability as to the ability to host major events from time to time.

2.5. Response from CWA:

ACSA indicates the number of diversions at CTIA is extremely limited and that there were only 2 runway closures in 2023 and that this does not provide adequate justification for the need and desirability of a second international airport in Cape Town.

CWA reiterates that it is not the number of diversions which determines the value proposition of CWA as a planning alternate aerodrome. Distance to an alternate airport for a diversion is a direct determinant of the quantum of reserve fuel to be carried on board each flight. The development of CWA would allow for the changing of the declared alternate airport from ORTIA, KSIA, BFIA, UIA, George Airport or CDSIA to CWA/FAWN. For example, changing the diversion airport from ORTIA to CWA/FAWN results in a substantial reduction in possible diversion distance, from 1271km to 25km. CWA will be the closest operational alternate to CTIA and is therefore the most optimal alternate from a fuel planning perspective, enabling a reduction in carried reserve fuel, and therefore take-off weight.

This take-off weight reduction leads to fuel consumption savings and therefore reduced atmospheric emissions and other environmental savings. The reduced take-off weight also allows for additional payload to be carried on board (pax or cargo), providing an additional layer of optimisation and financial sustainability for airlines.

Designating CWA/FAWN as the preferred alternate airport offers significant operational advantages, including improved fuel efficiency and augmented payload capacity, with associated cost savings and environmental benefits, therefore improving the global business case for flying into Cape Town as a region.

The recommendation to designate CWA/FAWN as the primary alternate diversion airport for a flight is supported by robust evidence of

2.6. Page 1 1 of 324, bullet 1.1.2: The developer states: "Competition benefits both businesses and consumers. It shows companies where they need to improve; encourage organisations to strive for greater efficiency, become more innovative, more productive, and be better businesses, in other words ultimately satisfying unmet demand".

Our response to this statement: There remains no evidence of this statement regarding unmet demand in any of the reports, specifically in terms of scheduled services. It seems peculiar that CWA is prepared to progress with this project, at the potential detriment to CTIA and industry, without any evidence of this unmet demand, and ACSA's assurance that it has adequate capacity at CTIA.

The developer goes on to say that "It is CWA's view that ACSA should welcome the proposed investment into CWA as it helps to grow the SA airport network and sector as a whole, while de-risking ACSA's business through private sector investment".

Our response to this statement is that in the global economy, CTIA is already facing competition from other regional and international airports and countries competing for the same tourism and business market. Local competition in terms of the national context will currently not be to the benefit of the country nor Western Cape.

operational advantages, emphasising positive impacts on both economic and environmental aspects of air travel as described in 2.1 above.

The limited number of runway closures and diversions does not undermine the role of CWA as a planning alternate aerodrome and/or the overall value proposition to the industry. Designating an alternate airport is a planning requirement and it unrelated to the number of actual diversions. As such the value to the industry is applied regardless of the number of actual diversions.

2.6. Response from CWA: ACSA has enjoyed retaining a monopoly in the Western Cape for the past 30 years and, it appears wishes to retain this monopoly for the next 40-50 years (as is evident from ACSA's assurances regarding capacity in line with their master plan). This constant inwardly focused lens is counterproductive to the growth of the region and South Africa at large. A more strategic and collaborative approach is what is needed to promote sustainability- not just for ACSA – but for the industry and the region.

Notwithstanding the above, CWA will address ACSA's concern around competition again. CWA has previously highlighted that, as long as ACSA does not overinvest in CTIA, CTIA will not be unsustainable due to the nature of the regulatory framework which allows for periodic reviews. Both airports can co-exist if plans are well informed by shifting market conditions. Based on CWA's value proposition, it is CWA's firm belief that competition will benefit the passenger, the industry, the Western Cape and the country.

The introduction of CWA will not be to the detriment of CTIA or the industry. As it stands, CTIA does not have adequate capacity to serve future growth, investment must still be made, and this infrastructure must still be delivered.

Without disclosing the detail of CWA's confidential market strategies, because not all destinations or routes connect to Cape Town, there is unmet demand. CWA believes that CWA as the second international airport will unlock unmet demand (that would not be unlocked within the context of a monopoly). CWA believes that an additional airport will strengthen South Africa's position in the global market. By introducing

2.7. Page 16 of 324, Part 2 bullet 1.5: The developer states that "the ACSA long-term traffic forecasts and associated development plans are dynamic and flexible", and suggests "ACSA is able to easily adapt to changes in market drivers, technology and traffic demand".

Our response to this is that, whilst there may be a perceived level of flexibility, it must be kept in mind that some of our capacity projects take years to complete, and once commenced, cannot easily be halted. Additionally, these projects typically provide capacity for 5 to 10 years in advance to prevent airports from being perpetual construction sites. The development process is not flexible, and capacity will be provided based on predicted future demand. A second

more competition, it enhances the overall appeal of the country as a destination, offering travellers more options and encouraging greater innovation and efficiency in services. This added competition can ultimately benefit both tourism and business by improving accessibility and attracting more international flights, making South Africa an even more attractive destination on the global stage. Rather than seeing 'local competition' as a threat, the added competition could be a catalyst for growth and development, benefiting the region and the country as a whole.

CWA is encouraged by the ACSA CEO more recently stating that ACSA is not concerned about CWA as a second airport and that the two airports will be able to co-exist. Refer to the follow medial links:

<https://www.moneyweb.co.za/news/companies-and-deals/acsa-boss-not-worried-about-competitor-airport-in-cape-town/>

<https://www.iol.co.za/business/advice/cape-winelands-airport-is-no-threat-to-cape-town-international-says-acsa-ceo-mpumi-mpofu-44144632-ee6a-4dba-8a48-86795abc09e3>

The sentiments expressed by the ACSA CEO are well aligned to the views and sentiments held by CWA.

2.7. Response from CWA: Previously CWA has indicated that as long as no unnecessary investments in infrastructure are made, the ACSA airports will always be sustainable. Tariffs will only rise if ACSA invests inefficiently, in other words over-invests in infrastructure. The regulatory framework ensures that ACSA's traffic forecast is reviewed periodically. The periodic reviews that are required under the regulatory process are in place to ensure that ACSA takes into account shifting commercial factors such as new market entrants, in this instance the proposed expansion of CWA. Given that ACSA only introduces capacity within a 5–10-year period as highlighted above, this further allows ACSA with sufficient opportunity to adjust its plans where and if required. This will

airport so close to CTIA may result in underutilized capacity which is not in the interest of industry or the flying public as this will increase costs and reduce efficiency. Currently, CTIA enjoys economies of scale, the benefit of which is passed on to the passenger and airline through a reduced tariff. If passenger throughput is reduced, using the same capacity, the impact will be an increase in passenger and airline tariffs.

2.8. Page 20 of 324, Part 3, bullet 1.8, sub-bullet 3: The developer states: "In accordance with the business plan, the economic and financial feasibility and viability for CWA indicates that the Cape Winelands Airport is economically viable and financially feasible and demonstrates long-term sustainability."

Our response to this is, in the absence of these reports and plans, the assumptions on CWA's viability remains unknown, and therefore the need and desirability of this project remain questionable.

2.9. Page 21 and 22 of 324; "Complementary Role as a Diversion Airport". The developer states that "the existence of Cape Winelands Airport will enable a 5% reduction in carbon emissions for every flight flying into CTIA. It will allow Cape Town to be ahead of the curve in being an attractive destination for those users that do not only value lower

ensure that ACSA does not negatively impact the airlines, the travelling public, the industry or the regional economy by passing on unnecessary high costs.

CWA reiterates that the periodic review of the traffic forecasts that informs the planned infrastructure programme that is implemented every 5-10 years (as highlighted by ACSA) will help to ensure that ACSA does not invest in infrastructure that is not needed. As long as ACSA does not over-invest or build what is not needed, higher costs (tariffs) will not be passed on to the airlines and therefore to passengers.

2.8. Response from CWA:

CWA reminds ACSA that the comment which they highlight should be considered within the context within which it was written i.e. CWA developed a comprehensive business strategy. The business strategy was informed by extensive market intelligence, stakeholder input, and a thorough risk analysis. Consideration was also given to detailed financial projections to support decision-making. From this, a comprehensive market strategy was formulated to guide the airport's positioning and growth in the competitive landscape. Only then, in alignment with the business strategy, an economic and financial feasibility assessment confirmed that CWA is both economically viable and financially sustainable, with strong prospects for long-term success, including how the airport is poised to make a positive significant contribution to environmental sustainability for the airline industry and how it will contribute to regional growth.

CWA confirms that the airport business is economically viable and financially feasible. Were it not, the massive capital investment – undertaken through private sector investment - would not be made. CWA maintains that it is inappropriate and unreasonable for ACSA to request access to these business reports, as they contain sensitive and confidential information.

2.9. Response from CWA: Response to ACSA's Comments on the "Complementary Role as a Diversion Airport"

costs but also environmental considerations — an increasing trend amongst global travellers. Through this CWA will also align to the aspirations as set out in the National Airport Development Plan (NADP). "

Our response to this is that the environmental and carbon benefits remain unclear. The Airspace and Capacity specialist study (Appendix 21) does not account for additional flight track miles flown to account for airspace dependencies and additional demand on airspace, as they do not use peak hour capacity demand.

CWA is also an additional 27km driving time from the City of Cape Town CBD compared to CT IA. None of the studies, including the Climate Change Impact Study (Appendix 29) and Transport Impact Assessment (Appendix 25) consider the additional driving times and subsequent emissions of ground transport in comparison to the existing CTIA. The difference in distance may well negate the purported benefits declared by the specialists and developer. This impact should be assessed to verify this claim.

2.10. Page 22 of 324, under the heading "Complementary Role as a Diversion Airport' and advocating the benefits of a "diversion airport", the developer states that "CWA does not take away any of Cape Town International Airport's Traffic". This statement appears in contradiction to previous statements where CWA states their intention is to grow traffic into CWA, which implies that there will be traffic dilution into CTIA.

A study conducted by PACE Aerospace Engineering and Information Technology GmbH PACE, Appendix 16 recommends a generalized CO₂ reduction of up to 5% as the benefit of using CWA as an alternate for CTIA.

The continued reference to airspace dependencies in ACSA's response is inconsistent with the evidence presented in the Airspace and Capacity Specialist Study (Appendix 21). This study has demonstrated that the independent operation of CTIA and CWA is viable, with no significant additional track miles or airspace inefficiencies introduced. The modelling as well as the fast-time simulations conducted thus far have shown that CWA's operations can be integrated seamlessly into the regional airspace structure without compromising efficiency or safety.

EAP response: The impacts assessed are in relation to the proposed project scope for CWA and not as a comparison with CTIA. The EIA process considers the proposed CWA project and the impacts associated with it. It is not a comparative study between CTIA and CWA. It is also a subjective statement – not all passengers come from the Cape Town CBD, and there are more factors considered by a potential passenger than just distance when they select an airport, e.g. safety. This viewpoint is supported by both ITS (Appendix 24), who conducted the transport impact assessment and Brundtland (Appendix 28), who conducted climate change study.

2.10. Response from CWA: This statement must be considered within the context in which it was made. The complementary role that CWA plays as a Diversion Airport to CTIA is an important one. Within the context of CWA's role as a diversion airport it is important to clarify that CWA will not be in direct competition with CTIA for traffic. In this context, CWA serves a specific and supportive function that will enhance the operational resilience of air travel in the region. All international and domestic airlines, when planning their flights, are legally required to

2.11. Page 23 of 324, under the heading "Complementary Role as a Reliever Airport", the developer states that "CWA will improve the attractiveness of the city to host major events by providing additional airport capacity. When the city bids for a mega event, air access is always a key consideration and with added airport capacity it could be the difference between being the winning bidding city or not. "

Our response to this is that, as illustrated during the 2010 Soccer World Cup, additional demand can be accommodated through operational interventions. The probability that large events will be hosted in one city is unlikely as the economic benefits of such an event will be distributed over various cities or regions as seen during the Soccer World Cup. CTIA has already been successful in hosting major events and is the most award-winning airport in Africa.

identify an alternate airport as part of their fuel planning protocols. This is not optional but a regulatory necessity that ensures airlines carry enough fuel to reach a diversion airport in the event that they are unable to land at their primary destination in this case, CTIA. This requirement is embedded in aviation regulations and is applicable to every flight departing or arriving an airport. The added fuel is required to be loaded for each flight, where a diversion occurs or not.

In its complementary role and through its existence as a diversion airport option CWA will unlock immense financial, environmental and in the event of an actual diversion, also operational benefits for all airlines flying to CTIA. An airline will still fly to CTIA but will nominate CWA as its alternate airport (rather than, for example, George) allowing it to carry much less fuel – which allows for the direct financial, environmental and if required operational benefits as highlighted above. In addition, because of the existence of a much closer diversion airport, airlines will likely be able to make a firmer commitment to Cape Town as a destination through their subsequent improved route profitability.

2.11. Response from CWA: CWA commends CTIA on being an award-winning airport. As the major international airport in Cape Town the accolades that it receives continue to make a positive contribution toward the region. As a reliever airport, CWA will be able to make a positive contribution to the region as well. It is a well-known fact that when destinations for events, especially mega events, are scouted for, locations with greater air access and available capacity are preferred.

Importantly, CWA is not seeking to negate, replace or challenge the operational procedures at CTIA. Rather, it highlights the fact that by having a secondary airport in the city, unnecessary pressures on CTIA can be alleviated. Special procedures and additional operational costs, which are often required when a single airport is stretched to its limits, can be avoided. This strategic advantage would make Cape Town an even more attractive option for major event organisers, who often consider the capacity and logistical efficiency of airports as part of their decision-making process. Notwithstanding ACSA's ability to play its role when having hosted a successful soccer world cup and the well-planned operational procedures, it also required major capital investment,

			<p>arguably the biggest in ACSA's existence to date. The introduction of CWA will open other opportunities that would not have been possible with the airport not being developed.</p> <p>Unrestricted air access is key to the the ability to host large scale mega events. CTIA as the current, and sole, international air access point is increasingly not equipped to on its own host large scale events, again using the G20 event as an example.</p> <p>https://www.news24.com/fin24/economy/g20-summit-joburg-pips-cape-town-ethekwini-as-host-city-thanks-to-airports-hotels-20241028</p> <p>CWA represents growth, new opportunities and, recognising that airports are levers to unlocking significant socio-economic benefits, CWA will have a material positive impact.</p> <p>The much-needed runway realignment of the CTIA runway comes at a cost and in this instance we are not referring to financial. In building the new realigned runway in terms of the environmental approval granted it will have the end result that the existing secondary cross runway, runway 18-34 will be closed as it is in the footprint of the new realigned runway. The implications of this are significant in that CTIA would have zero runway redundancy in the event of an incident or failure of the new realigned runway forces the closure of the runway.</p> <p>Operating a remote, long-haul destination with a single runway airport exceeding 10 million passengers per annum and growing continuously exponentially represents a large and real risk. With the approval and commissioning of CWA this risk will be adequately mitigated.</p> <p>In summary, CWA's role as a reliever airport will not only enhance the operational efficiency of Cape Town's aviation infrastructure but also contribute to making the region a more competitive and appealing destination for international mega events, with greater capacity to handle large-scale travel demands. ACSA has enjoyed a monopoly since its existence. CWA kindly</p>
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2.12. Page 25 of 324: The EAP states the following in terms of considering ACSA's future developments and ability to meet future demand: "Response by EAP: The comment is noted The EAP also notes the masterplan on which the CTIA capacity and growth statement is based. In terms of NEMA the development rights are not in place for the full scope of the masterplan, therefore it does not form part of the scope of assessment."

We believe this interpretation is incorrect. As explained in Section 2.2 above, whilst the second parallel runway still requires regulatory approval, the new re-aligned runway, terminal expansion projects, and apron developments either enjoy regulatory (EIA) approval, or do not require further regulatory approval since they occur on the existing airport development footprint. The capacity of these developments, which are approved and enjoy development rights, will more than cater for the expected growth in demand over the next 15 years, and so must be considered in the CWA EIA.

With regards to the second parallel runway, we believe that despite this specific project not having regulatory approval, this too must be considered and assessed in the CWA EIA. Our reasoning is that the EIA regulations under NEMA recognise the cumulative impacts of developments, defining "cumulative impact" as: "in relation to an activity, means the past, current and reasonably foreseeable future impact of an activity. considered together with the impact of activities associated with that activity, that in itself may not be significant, but may become significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities".

As we have outlined on Page 37 to 39 of 324, the second parallel runway is not merely an intent: it has been included in our Master Plan which has been approved by the Department of Transport, we have

encourages ACSA to consider a broader perspective and recognise the potential value that a second airport could bring to Cape Town. An outward-looking approach may reveal significant benefits for the region and the country as a whole.

2.12. EAP response: ACSA states that the new re-aligned runway, terminal expansion projects, and apron developments either enjoy regulatory (EIA) approval, or do not require further regulatory approval since they occur on the existing airport development footprint. The second parallel runway still requires regulatory approval. Therefore, the development rights are not yet in place for the full scope of the masterplan, therefore it does not form part of the scope of assessment.

With regard to the second parallel runway – the development of an additional runway cannot be seen as a cumulative impact. The definition of "significant impact" (NEMA) *means an impact that may have a notable effect on one or more aspects of the environment or may result in non-compliance with accepted environmental quality standards, thresholds or targets and is determined through rating the positive and negative effects of an impact on the environment based on criteria such as duration, magnitude, intensity and probability of occurrence.*

The development of a second parallel runway is an activity and not an impact.

shared this Master Plan with the local and provincial authorities over the past 25 years, these authorities have recognized, supported and adopted this intent by incorporating these plans in their urban spatial designs, planning roads and townships in relation to this second runway. It is most definitely reasonable to assume this second parallel runway will in fact be built in the foreseeable future, and in terms of NEMA's definition of cumulative impacts, the EAP must recognise this development in the EIA, most importantly in the socio-economic and airspace and capacity design reports of the EIA. If the argument is that there is insufficient information for the EAP to include this second runway in their assessment, ACSA can provide this accordingly via the "Airport Task Force smaller work groups" proposed by the authors of the "CWA Airspace and Capacity Study", Appendix 21, and discussed in Section 1.2 above.

2.13. Page 32 of 324, bullet 1.9: The developer states that "It is factually incorrect to state that the CWA proposed upgrading has never been considered in government policy or the National Airport Development Plan (NADP) as a specific development would never be included in policy. A development can however be aligned to policy and CWA is strongly aligned to government policy and the NADP".

Our response to this: Reference is made to NCAP and the NADP which is an extension of the NCAP, where the number of international airports is limited to a single airport per province, with the exception of Gauteng Province.

2.13. Response from CWA: The context was CWA responding to the comment previously made by ACSA. ACSA previously commented as follows: "It is important to note that since the commencement of this EIA, the proposed upgrading of CWA to a scheduled commercial domestic and international airport has never been considered in government policy, the National Aviation Development Plan (NADP) and the City of Cape Town Metropolitan Spatial Development Framework (MSDF). A second or secondary city airport in the greater Cape Town area has also not been formally considered in policy or strategy, since it has long been established that Cape Town International Airport (CTIA) has capacity to expand and meet demand for the foreseeable future".

It was in response to this comment that CWA confirmed that it would be "factually incorrect to state that the CWA proposed upgrading has never been considered in government policy or the National Airport Development Plan (NADP) as a specific development would never be included in policy. A development can however be aligned to policy and CWA is strongly aligned to government policy and the NADP".

CWA affirms that it is strongly aligned with the vision as set out in the NCAP and NADP, the strategic priorities and the gaps which have been identified in these policy documents. Our development strongly supports these policies as well as broader national policies, plans and strategic objectives.

2.14. Page 36 of 324, bullet 5: ACSA re-iterated the need for the EAP and CWA to consider and include the approved re-aligned runway in its EIA. The developer responded that: "A supplementary study and simulation were initiated in response to the EIA comments and will be included in the impact assessment phase of the EIA. The purpose of the study is to further validate and reaffirm that: i) FA WN and FACT can operate independently and safely with, considering both CTIA runways, 01/19 and its new realigned runway (NRR) runway configuration(s); ii) FACT arrival and departure tracks over FAWN will have sufficient distance to permit independent operations between the two airports; and iii) Aircraft arriving and departing FACT permit sufficient vertical separation for aircraft to depart and arrive FA WN. Arriving and departing aircraft for the respective airfields can be separated laterally and vertically well within accepted industry norms and standards.

Our response: We still await this study. The Appendix 21 'CWA Airspace and Capacity Study' does not address our concerns in sufficient detail. Although the required separations may be possible, the implications on capacity, noise, and track miles are not known. The study does not consider peak hour traffic, and it only looks at scheduled flights; it does not consider non-scheduled flights. These findings are critical to determine the future impact of CWA. The study does not address the environmental impacts or degradation that may be caused if the application is granted, therefore, fall short of the standard required under NEMA.

We are aware of the decision taken by cabinet in 1998 to limit the ports of entry. CWA is also aware that obtaining port of entry status is a separate process.

2.14. Response from CWA: The claim that the Appendix 21 "CWA Airspace and Capacity Study" does not address concerns in sufficient detail overlooks the extensive analysis and evidence provided in the study. The study clearly demonstrates that the required separations between CTIA and CWA are achievable without compromising safety or efficiency. Furthermore, the concerns raised regarding capacity, noise, and track miles are addressed within the scope of the study, supported by modelling and simulations that validate the viability of independent operations. For ease of reference below is the airspace review summary found on page 34:

- The high-level review of the FACT arrival and departure tracks over FAWN indicates there is sufficient distance to permit independent operations between the two airports. Aircraft arriving and departing FACT permit sufficient vertical separation for aircraft to depart and arrive FAWN.
- The NACO CONOPS report demonstrates how the FAWN procedures could be adapted to merge with FACT traffic routes in the short term. The concept IFP designs are feasible and demonstrate the capability of PANS-OPS design criteria to achieve solutions to complex airspace designs.
- As capacity demands on airspace grow, the route structure can be adapted to separate the routes laterally. The adoption of vertical and lateral separation can easily be developed within the capability of the PBN requirements post 2030 and as described with respect to the ICAO Global Air Navigation Plan (GANP) and the South African National Airspace Master Plan.
- It should be noted that ATNS contributed to the development of the CONOPS, as the designated ANSP, they have not identified any airspace constraints to capacity with both airports in operations.
- Examples of near-airport environments in high-capacity airspace provides sufficient evidence that the close proximity of FAWN to

			<p>FACT should not impact the current and future aspirations of both airports. The examples provided differing runway alignments and environments.</p> <ul style="list-style-type: none"> • The conclusion of the aforementioned analysis has determined that the current and future airspace demands for FACT will not be affected by the future aspirations of FAWN. The airspace environment will permit the airports to operate independently of each other. <p>Capacity Implications</p> <p>The assertion that the study does not consider peak-hour traffic or non-scheduled flights is incorrect. The study focuses on scheduled flights to establish a baseline for capacity and operational feasibility, which is standard practice for airspace planning. While peak-hour capacity and non-scheduled flights are not the primary focus, the findings clearly demonstrate sufficient airspace capacity to accommodate these scenarios. Additionally, non-scheduled flights typically account for a smaller proportion of overall traffic and do not materially affect the conclusions of the study.</p> <p>Noise and Track Miles</p> <p>Concerns about noise and track miles are speculative and not supported by evidence. The study indicates that arriving and departing aircraft at CTIA and CWA will utilize existing and optimized Standard Instrument Departure (SID) and Standard Terminal Arrival Route (STAR) procedures, minimizing noise impacts and unnecessary deviations. Furthermore, the proximity of CWA to CTIA and the efficient route structures proposed significantly reduce the likelihood of excessive track miles.</p> <p>Environmental Impacts under NEMA</p> <p>EAP response: There is no requirement for Appendix 21 'CWA Airspace and Capacity Study' to comply to the Appendix 6 requirements of NEMA. It is a technical supplementary document to provide more information to IAPs.</p> <p>Conclusion</p>
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		<p>3. Appendix 24: Socio- Economic Study:</p> <p>The author states on page 3 the following: "Cumulative impacts refer to any other developments as well as existing activities within the immediate area that could compound any positive or negative impacts associated with the proposed development. This usually refers to similar developments, such as the proposed upgrades at CTIA, which is too far away to have a cumulative impact, except for the provision of transport infrastructure."</p> <p>We believe the author incorrectly dismisses the potential cumulative socio-economic impact of CWA on CTIA and underestimates the sphere of socio-economic influence CTIA airport has on the complementary industries surrounding the airport.</p> <p>The close proximity of these two airports (22km) will most certainly have an impact on one another in terms of competing for complementary industries. No where in the world do two international airports co-exist and compete for the same market, within 22km of one another, and in a similar socio-economic back drop and level of wealth such as Cape Town. One cannot compare London Heathrow and Gatwick, JFK and LaGuardia and other examples quoted by the developer, as these economies are</p>	<p>The criticisms of Appendix 21 fail to acknowledge the robust analysis and evidence presented. The study demonstrates that CTIA and CWA can coexist without significant adverse impacts on airspace capacity, noise, or efficiency. The phased and structured EIA process ensures that all relevant environmental and operational factors are addressed, meeting the requirements of NEMA. The findings of the airspace and capacity study remain a critical and valid foundation for the approval of CWA as a complementary and sustainable addition to the region's aviation infrastructure.</p> <p>Again, CWA welcomes the recent public statement by ACSA's CEO that "the new airport will not pose a threat to the existing operations of Cape Town International, and that the two airports can coexist and complement each other" (https://search.app/qlaE85Qh1b7aN4G56) is welcomed by the Applicant.</p> <p>3. As stated in previous responses, CWA responds as follows:</p> <p>Addressing ACSA's position on competition:</p> <p>ACSA has since its establishment had the benefit of operating CTIA for 30 years without competition.</p> <p>CWA's position is that competition in a free-market economy is critically important, this includes competing fairly with competitors, customers and suppliers, alike.</p> <p>Competition benefits both businesses and consumers. It shows companies where they need to improve; encourage organisations to strive for greater efficiency, become more innovative, more productive, and be better businesses, in other words ultimately satisfying unmet demand.</p> <p>It is CWA's view that ACSA should welcome the proposed investment into CWA as it helps to grow the SA airport network and sector as a whole, while de-risking ACSA's business through private sector investment.</p>
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highly developed in comparison to Cape Town, and supported by wealthy and much larger populations.

Whilst competition is healthy, in this context, there is simply not enough demand nor future growth to warrant a second international airport in Cape Town. Airports have a massive economic impact on surrounding precincts, their sphere of influence is not limited to the boundaries of the airport.

Should CWA's proposed development proceed, industries around CTIA may stagnate and decline if capital allocation is split between two competing airports, as opposed to catering for additional growth and demand. It is through this lens that the socio-economic specialist study needs to consider and assess the impact on society and the economy surrounding CTIA, and the loss of future work opportunities at and around CTIA if it is not developed in accordance to its Master Plan, as a result of the proposed CWA development.

The assertion that there is “not enough demand nor future growth to warrant a second international airport in Cape Town.” CWA’s position is based on market realities, global best practices, and the regulatory framework that governs fair competition in the aviation sector.

The Airports Company Act 44 of 1993 explicitly prohibits ACSA from abusing its monopoly position to unfairly prejudice other airport operators. Section 10(a) of the Act states:

“The Company shall not abuse its monopoly position in a manner that unreasonably prejudices any other airport operator.”

By questioning the viability of CWA purely on demand projections and market influence, ACSA risks positioning itself not as a market participant, but as an entity attempting to restrict competition and investment in a manner inconsistent with its regulated status. ACSA is a state-owned entity operating in a regulated environment where its role is to facilitate, not limit, economic growth within the sector.

Cape Town’s aviation sector has experienced significant passenger growth over the past decade, driven by international tourism, air cargo, and low-cost carrier expansion. The question is not whether demand exists today, but whether Cape Town is adequately planning for future growth. Air traffic growth trends indicate that Cape Town’s aviation sector is expanding, and demand projections should be based on independent studies rather than ACSA’s internal modelling. The expansion of low-cost carriers globally demonstrates that secondary airports play a critical role in reducing congestion and providing cost-effective alternatives for airlines. Similarly, air cargo and logistics demand continue to grow, and CWA’s location, accessibility, and business model cater to specific sectors that CTIA may not optimally serve.

Globally, major cities such as London, Paris, New York, and Johannesburg operate multiple airports to meet growing aviation demands. Even

			<p>Windhoek, Namibia, has two airports, reinforcing that a growing metropolitan region such as Cape Town requires a diversified airport network for long-term resilience.</p> <p>CWA is not simply a competitor to CTIA—it represents a strategic private-sector investment into South Africa’s aviation industry that benefits the broader economy. Private sector investment in CWA helps to de-risk ACSA’s business by diversifying South Africa’s aviation infrastructure. A multi-airport system enhances resilience, ensuring that Cape Town and South Africa can handle increasing aviation demand while improving airline flexibility. Additionally, CWA’s development will stimulate economic growth, including job creation, increased tourism, and air cargo expansion. This investment reduces financial reliance on state-owned infrastructure, unlocking economic benefits that enhance, rather than undermine, South Africa’s overall airport network.</p> <p>Fair competition is fundamental to economic progress. Competition fosters innovation, efficiency, and better service delivery, ultimately benefiting businesses, airlines, and consumers alike. ACSA, as a regulated entity, must acknowledge that competition is not a threat—it is an opportunity for growth and improvement.</p> <p>Instead of resisting competition, ACSA should recognize that a strong, diversified airport network benefits all stakeholders, including ACSA itself. Aviation growth in Cape Town must be driven by open-market principles, guided by regulatory frameworks that prevent monopolistic control over critical infrastructure. CWA remains committed to engaging constructively with all stakeholders, including ACSA, to ensure the long-term sustainability, resilience, and growth of South Africa’s aviation sector.</p> <p>Addressing ACSA’s concern relating to sustainability:</p> <p>The regulatory framework as outlined in the Airports Company Act 1993, protects ACSA by granting a commercial return on assets and thus, as long as</p>
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			<p>no unnecessary investments in infrastructure are made, the airports will always be sustainable.</p> <p>The regulatory framework cannot be refuted. While ACSA continues to raise the concerns over dilution of traffic into CTIA and the major risk it would pose to their planned investment programmes and continued investment at CTIA, the regulatory framework as outlined in the Airports Company Act 1993, protects ACSA by granting a commercial return on assets and thus, as long as no unnecessary investments in infrastructure are made, the airports will always be sustainable. The commercial return covers both capital and operational expenditure, including employee costs. This is true for all airports in the ACSA network, including Cape Town International Airport.</p> <p>The ACSA long-term traffic forecasts and associated development plans are dynamic and flexible</p> <p>The ACSA long-term traffic forecasts and associated development plans are dynamic and flexible. The economic regulator grants a tariff to fund a particular ACSA developed capex plan. The tariff decision is dynamic and accounts for changes in the capex plan over time. This means that the plans are not fixed due to market shifts and environmental factors.</p> <p>The plans are determined through the constructive engagement process with airlines and are dynamic. It changes over time as traffic demand, technology and other market drivers change. This includes the possible introduction of airport infrastructure outside of the ACSA network, such as the CWA development.</p> <p>The ACSA development plans or capex plans, are a function of market and industry inputs. The development plans are co-created together with the airlines and must be dynamic enough to respond to market changes. The</p>
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			<p>permission process allows for periodical updates, allowing for traffic forecasts and development plans to be updated as required.</p> <p>The SEIR assessed in detail the impacts of the project. The report highlights:</p> <p>The Cape Winelands Airport is a large private investment that would contribute to economic growth and job creation during the construction and operational phases. On the positive side, multiple developments in the Fisantekraal area could compound employment and economic benefits. The proposed CWA development clearly focuses on transport and commercial uses that will contribute to employment and new business opportunities for the CMA. The roll-out of the project offers an opportunity for skills development and will contribute to transport infrastructure. The project could sustain about 32 433 (direct, indirect, and induced) employment opportunities during construction, including ongoing capital expenditure upgrades over 20 years.</p> <p>CWA draws ACSA’s attention to a few extracts from the SEIR impact section, section six of the report:</p> <ul style="list-style-type: none"> • Employment creation does not necessarily imply new jobs but sustainable employment for employees of contracted service providers not operating at full capacity. If the company doesn’t have spare capacity, additional workers may be appointed, in which case new jobs will be created during the construction phase. <p>For the initial two years of construction:</p> <ul style="list-style-type: none"> • An estimated R6,4 billion in capital investment could generate R17,4 billion in new business sales, referred to as the production (or
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			<p>output) that creates demand for business activity during construction.</p> <ul style="list-style-type: none"> • The increase in production output could add R5,6 billion (net of the import leakage) to the GGP of the CMA. • The project could sustain about 25 107 (direct, indirect and induced) employment opportunities (refer to net jobs movement). • Household income from job opportunities could increase by R4,7 billion. • Over a period of 22 years the report highlights that: • The estimated capital investment could generate R23,2 billion in new business sales, the production (or output) that creates demand for business activity with an average expenditure of R1,1 billion per annum. • The increase in production output could add R8,8 billion (net of the import leakage) to the GGP of the CMA in nominal terms. The average GGP contribution is R400 million annually, with the highest impact of R3,2 billion in Year -1 and the lowest of R59 million in Year 20. • The household incomes from the workers could result in an additional spending of R3,8 billion, which translates to an average of R173 million per annum. <p>Based on the above one can conclude that the positive socio-economic impact of the CWA expansion will be significant and that it will leave a lasting impact on the communities who will be the direct beneficiaries.</p> <p>From an employment perspective the SEIR indicates that 57,33% of the total population residing within 10km of the site is employed, while 59,61% within 20km are employed.</p> <p>Noting the unemployment statistics within the 10 and 20km radii, and with CWA being approximately 45km driving distance away from CTIA (22km as the crow flies), it is CWA's view that employees at the airport will come from the</p>
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			<p>surrounding communities, providing much needed employment opportunities for people close to where they live.</p> <p>Proximity</p> <p>ACSA's claim that Cape Winelands Airport (CWA) and Cape Town International Airport (CTIA) are too close to coexist is misleading, as it relies on a straight-line measurement rather than real-world accessibility. In practice, the driving distance between the two airports is significantly greater, making their operational separation more meaningful.</p> <p>Passengers, cargo operators, and airlines do not choose airports based on aerial distance but rather on travel time, convenience, and the services offered. Many global cities successfully operate multiple international airports within similar or even shorter travel distances, proving that proximity alone is not a limiting factor.</p> <p>Cities like São Paulo, where Guarulhos and Congonhas serve overlapping markets, show how airports within the same metropolitan area can thrive. In Istanbul, the new Istanbul Airport coexists with Sabiha Gökçen, despite being in relatively close proximity. Similarly, Bangkok's Suvarnabhumi and Don Mueang airports serve both international and regional flights while competing in key aviation segments. Even within South Africa, Johannesburg's OR Tambo and Lanseria airports, both International Airports, successfully operate side by side, each catering to different market segments and competing at the same time.</p> <p>Beyond the operational and commercial justifications for a second airport, the development of CWA will also have a direct socio-economic benefit. Noting the unemployment statistics within the 10 and 20km radii, and with CWA being approximately 45km driving distance from CTIA (22km as the crow flies), it is CWA's view that employees at the airport will come from the surrounding communities, providing much-needed employment opportunities for people close to where they live. This aligns with global trends where secondary airports create localized employment hubs, reducing commuting distances and ensuring that economic benefits are more widely distributed.</p>
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		<p>4. ACSA appreciates the opportunity to comment on the proposed CWA development, and trusts that these comments will be addressed in the EIA.</p>	<p>Rather than creating unnecessary competition, having a second airport enhances efficiency and specialisation.</p> <p>Cape Town's geography and economic spread support the need for an additional airport. The city's transport network, tourism-driven economy, and growing aviation market require a decentralized approach rather than relying solely on a single airport. A second airport strengthens regional access, improves logistics, and provides flexibility for future growth.</p> <p>ACSA's focus on a simplistic distance measurement ignores the realities of airport operations and market demand. The viability of CWA is not about how close it appears on a map but about how it enhances Cape Town's broader aviation network, just as many successful multi-airport cities around the world have demonstrated.</p> <p>4. Noted.</p>
325	Dr LE Krige	<p>Email dated 12 December 2024:</p> <p>1. With this email, I am voicing my objection to the proposed extension of the Cape Winelands Airport. In my view as general medical practitioner who has lived in Durbanville for twenty years, the developers and the City of Cape Town have not done enough to inform the general public of the associated health risks that such a development would bring. My other concern is that Durbanville does not have the infrastructure to support such development. Also, the developers have not done enough to inform our community of the adverse effect that airports such as this have on the environment and the surrounding agricultural area.</p> <p>Please confirm receipt of my complaint.</p>	<p>Email response provided 13 December 2024:</p> <p>1. Thank you for the email.</p> <p>Your concerns will be recorded and responses provided in the Comments and Responses report to be circulated for comment early 2025. You will also be registered as an IAP for the proposed project if you are not already registered.</p> <p>Response from CWA: The Cape Winelands Airport prides itself on being a green and environmentally friendly airport and none of the specialist reports to date have suggested adverse effects on the surrounding agricultural areas. Important to note that the airport development carries the overwhelming support from the neighbouring farms, broader farming community in the area and the Durbanville Farmers Association.</p> <p>In terms of health risks to the general public, again none of the specialist reports have indicated or detected any significant risks. In developments such as these, noise tends to be the main consideration, again the noise specialist report has confirmed that in this development there will be no</p>

			<p>undue impact on existing residential communities i.e. Durbanville, Fisantekraal and Klipheuwel.</p> <p>Any potential impact of a negative nature will be assessed against the benefits associated with this development i.e. job creation and increased economic activity.</p> <p>EAP response: The Transport Impact Assessment (Appendix 25) assesses the impacts on the road infrastructure. The Bulk Engineering report (Appendix 41) assesses the need for bulk infrastructure (sewer, potable) to service the proposed development. The Electrical Supply report (Appendix 42) assesses the required electrical supply and alternative energy development for the proposed development. The impact on the surrounding agricultural area is assessed in the Agro-Ecosystem Impact Assessment Report (Appendix 28). Biophysical impacts on the environment have been assessed in the various specialist reports attached to the draft EIAR.</p>
326	Dr Leonard Heydenrych	<p>Email dated 12 December 2024:</p> <ol style="list-style-type: none"> 1. Please find attached my concerns regarding the negative impact of the proposed expansion of the Cape Winelands Airport on the Department of Music at Durbanville High School. Please confirm acceptance of my email. <p>Email dated 12 December 2024:</p> <ol style="list-style-type: none"> 2. I have slightly changed the wording in the previous document to the current format. The document deals with my concerns regarding the proposed extension of the Cape Winelands Airport. <p>Email reply provided 13 December 2024:</p> <ol style="list-style-type: none"> 3. Many thanks for confirming receipt of my email. 	<p>Email response provided 13 December 2024:</p> <ol style="list-style-type: none"> 1. Thank you for the email. Your concerns will be recorded and responses provided in the Comments and Responses report to be circulated for comment early 2025. You will also be registered as an IAP for the proposed project if you are not already registered. <p>Email response provided 13 December 2024:</p> <ol style="list-style-type: none"> 2. I acknowledge receipt of this email of which the attachment will replace the previous document sent. 3. Noted.

Email dated 13 December 2024:

4. The two documents to be reviewed are thus the ones already sent to you and again attached herewith. This is just to avoid any form of confusion.

Email response provided 13 December 2024:

4. Thank you for the clarification.

Letter received via email dated 12 December 2024:

5. As a professionally trained musician and as a medical specialist, I am concerned about the proposed extension of the Cape Winelands Airport. This extension could have a severely detrimental effect on the Department of Music at Durbanville High School, due to sound pollution. Durbanville High School boasts with probably the biggest music department in the Western Cape.

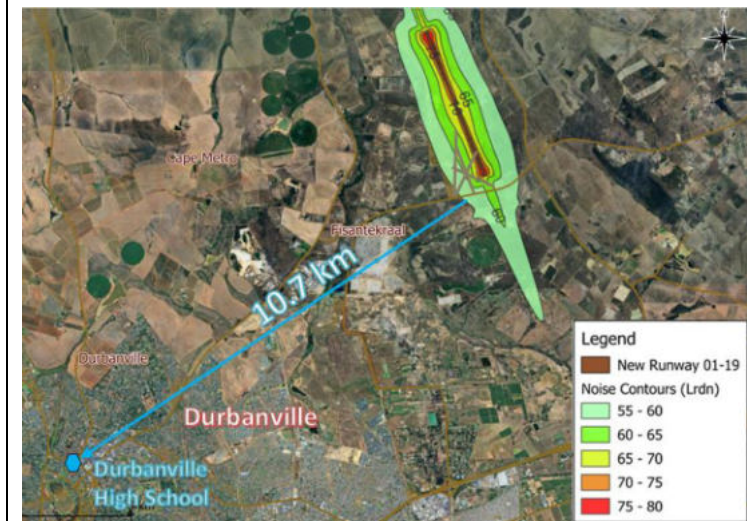
This orchestral department was founded in the early 1970's by Dr. Orlando Firmani and has developed into a prominent music institution. Many students and learners, who have qualified at Durbanville High School, have continued their musical studies overseas and today play in famous orchestras such as the Cape Town Philharmonic Orchestra. I was privileged to could have studied abroad, due to the training in orchestral studies at the music department of Durbanville High School.

After having completed my studies in music performance in London, I am very much aware of the correct and conducive environment for music studies. No 'noise nuisance' in the form of aviation noise was present at these institutions during my music studies. To perform teaching in music and -orchestral studies no 'noise nuisance' from external factors such as planes should be present. 'Noise nuisance' could prevent the musician to memorize and measure his or her own intonation and dynamics. If the music students cannot gauge these parameters, they can also not prepare adequately for any form of examination or performance. 'Noise nuisance' could include high or low sound intensity levels. Noise pollution has been shown to reduce concentration, and importantly decrease overall academic performance in children. (Basner 2017) Annoyance due to aircraft noise is the most common psychological effect and includes behavioral, emotional and cognitive elements. (Leylekian, 2020) These

5. Response from specialist:

The contour with the SANS guideline of 55 dB(A) is illustrated in the following image in relation to the Durbanville High School.

The school is located approximately 10.7km outside the above-mentioned noise contour. The noise contribution of the CWA operations to the school will be less than 25dB(A). This contribution to the existing noise environment at the location of the Durbanville High School is expected to be negligible.



		<p>elements could prevent the music student from concentrating and could severely impact on their interpretation, memorizing and performance of the musical repertoire.</p> <p>A part of the training of school children at Durbanville High School involves outdoor performances with the Durbanville High School Orchestra wind band, in particular at wine farms in the area and school playgrounds. The whole Durbanville environment has become the training ground for this exceptional musical establishment. 'Noise nuisance' from an airport will severely hinder this form of education since students require silence to concentrate, perform or study music or academics without any hindrance.</p> <p>Durbanville High School is regarded in high esteem internationally as a music institution and any form of noise hindrance by an airport preventing music teaching and music education, will be seen in an extremely negative light internationally.</p> <p>I believe that due to these detrimental effects on the music department and orchestral training at Durbanville High School and other schools in close proximity to the airport, the planned Cape Winelands 2 Airport extension should be reconsidered. Further, the Durbanville community should be fully informed about the potential negative effects on music education that the proposed extension will have. I therefore also request an extension of the deadline for public comments.</p> <p>References</p> <ol style="list-style-type: none"> 1. Basner M, Clark C, Hansell A, Hileman JI, Janssen S, Shepherd K, et al. Aviation Noise Impacts: State of the Science. <i>Noise & Health</i>. 2017;19(87):41-50 2. Leylekian L, Covrig A, Maximova A. Aviation Noise Impact Management, Technologies, Regulations, and Societal Well-being in Europe, Springer Books, 2020 <p>Letter received via email on 12 December 2024 (letter dated 11 December 2024):</p>	<p>Based on this contribution, the noise impacts of the aircraft operations are not anticipated to disturb any of the schools outdoor or indoor activities.</p>
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6. We are concerned about the proposed extension of the Cape Winelands Airport. This development will be close to the established densely populated Durbanville community. The development of the airport to accommodate high volumes of large passenger aircraft will have a profoundly negative impact on the health and well-being of all residents in Durbanville and surrounding areas.

Large airports are associated with several detrimental effects on the health of people living close to them. Scientific studies highlight noise and air pollution as two of the most important to consider. Some of the effects even occur at relatively low noise levels.

Overall quality of life is reduced in communities close to large airports. Noise pollution has been shown to disturb sleep patterns in residents, reduce concentration, and importantly decrease overall academic performance in children (Basner 2017). The extension of the Cape Winelands Airport close to a community with several schools and a large population of children and working adults are extremely problematic.

Premature deaths are increased. More adults develop hypertension (high blood pressure) (Correia 2013; Evrard 2015) and the number of residents suffering from cardiac arrhythmias, myocardial infarction (heart attacks), and strokes increases.

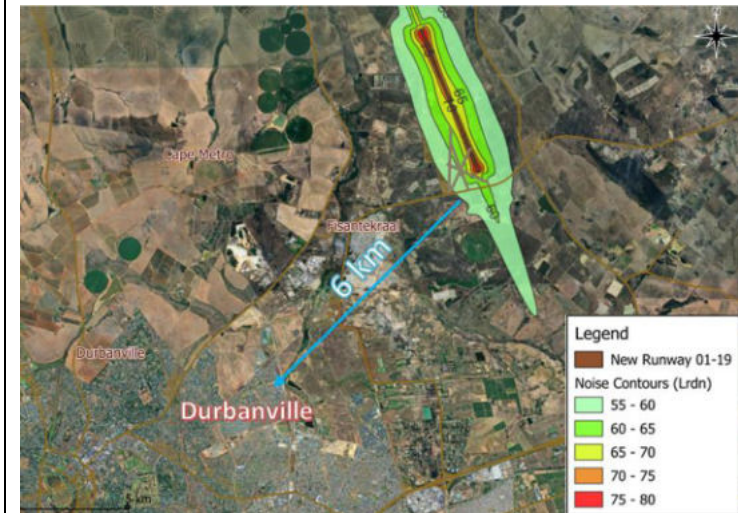
Living near an airport with high levels of noise exposure from planes can potentially lead to hearing loss over time, depending on the noise levels and duration of exposure and proximity to the constant noise source. Airplane take offs and landings can reach noise levels of 90–120 dB, particularly for those living very close to runways. While the occasional exposure may not cause immediate damage, chronic exposure to aircraft noise, especially during peak times, could have a cumulative effect on hearing over the years.

Stress levels (as determined by elevated cortisol levels) increase in residents (Baudin 2019). Of grave concern is the increase in mental health disease (such as anxiety), drug addiction and substance abuse (Baudin 2018). The City of Cape Town is already struggling to manage the enormous impact of these problems. The development of a large airport will compound these problems in the larger Durbanville community.

6. Specialist response:

The closest residential dwellings in Durbanville are situated approximately 6km outside the contour with the SANS guideline of 55dB(A) (see figure below).

The noise contribution of the CWA operations to the Durbanville area less than 30dB(A). This contribution to the existing Urban Residential environment is considered negligible.



		<p>Air pollution is increased by both the air traffic and the increase of motor vehicle traffic (Bendtsen 2021). Increased ultrafine particles have been detected 40km from a large airport. Exposure to diesel fumes (due to air traffic and vehicular traffic) and petrol (due to increased vehicular traffic) will also increase. This pollution will increase respiratory disease in Durbanville residents. The Western Cape is already battling with a very high incidence of Tuberculosis and an increased burden of air pollution in the area could increase the incidence of Tuberculosis, which South Africa cannot afford. (Van der Walt 2018, Feng 2022, Xiang 2021)</p> <p>We believe that due to these detrimental effects on the health and well-being of the residents of Durbanville the planned Cape Winelands Airport extension should be reconsidered. Further, the Durbanville community should be fully informed about the potential negative effects on their health and well-being that the proposed extension will have. We therefore also request an extension of the deadline for public comments.</p> <p>References</p> <ol style="list-style-type: none"> 1. Basner M, Clark C, Hansell A, Hileman JI, Janssen S, Shepherd K, et al. Aviation Noise Impacts: State of the Science. <i>Noise & Health</i>. 2017;19(87):41-50 2. Correia AW, Peters JL, Levy JI, Melly S, Dominici F. Residential exposure to aircraft noise and hospital admissions for cardiovascular diseases: multi- airport retrospective study. <i>The BMJ</i>. 2013;347. 3. Evrard AS, Bouaoun L, Champelovier P, Lambert J, Laumon B. Does exposure to aircraft noise increase the mortality from cardiovascular disease in the population living in the vicinity of airports? Results of an ecological study in France. <i>Noise & Health</i>. 2015;17(78):328-36. 4. Baudin C, Lefèvre M, Selander J, Babisch W, Cadum E, Carlier MC, et al. Saliva cortisol in relation to aircraft noise exposure: pooled-analysis results from seven European countries. <i>Environmental Health</i>. 2019;18. 	<p>Response from CWA:</p> <p>All airlines have committed to and are working towards net zero carbon footprints by 2050. Likewise, the Cape Winelands Airport prides itself on being a green and environmentally friendly airport, as part of this commitment vehicles deployed to support and service the airport and airlines will be electrical vehicles.</p> <p>As confirmed in the specialist reports the Cape Winelands Airport will allow airlines to significantly reduce their fuel uptake and burn i.e. up to 5% based on the more efficient diversion option it will provide to airlines flying to Cape Town.</p>
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5. Baudin C, Lefèvre M, Champelovier P, Lambert J, Laumon B, Evrard AS. Aircraft Noise and Psychological Ill-Health: The Results of a Cross-Sectional Study in France. *International Journal of Environmental Research and Public Health*. 2018;15(8).
6. Bendtsen KM, Bengtsen E, Saber AT, Vogel U. A review of health effects associated with exposure to jet engine emissions in and around airports. *Environmental Health*. 2021;20.
7. Van der Walt M, Moyo S. The First National TB Prevalence Survey | South Africa 2018. Short Report.
8. Feng Y, Wei J, Hu M, Xu C, Li T, Wang J, Chen W. Lagged Effects of Exposure to Air Pollutants on the Risk of Pulmonary Tuberculosis in a Highly Polluted Region. *Int. J. Environ. Res. Public Health* 2022, 19, 5752. <https://doi.org/10.3390/ijerph19095752>
9. Xiang K, Xu Z, Hu Y et al. Association between ambient air pollution and tuberculosis risk: A systematic review and meta-analysis. *Chemosphere Volume 277*, August 2021, 130342

Impact on Hearing References

These sources provide detailed evidence of the relationship between aircraft noise and hearing loss.

1. Kuo CY, Hung CL, Chen HC, Shih CP, Lu RH, Chen CW, et al. The Immediate and Long-Term Impact of Military Aircraft Noise on Hearing: A Cross-Sectional Comparison of Fighter Pilots and Ground Staff. *International Journal of Environmental Research and Public Health*. 2021;18(6). This study highlights the elevated hearing thresholds in individuals exposed to high-intensity aircraft noise. Chronic exposure in military and ground staff resulted in significant noise-induced hearing loss.
2. Van Kempen, E., et al. (2023). Health Impacts of Noise Exposure: Aircraft and Beyond. This research explores the effects of environmental noise exposure, including aircraft noise, on hearing and broader health outcomes. Regular

		exposure to levels exceeding 85 dB was linked to hearing impairment.	
327	Clarissa Fransman - CoCT	<p>Email dated 13 December 2024:</p> <ol style="list-style-type: none"> 1. Please find attached City of Cape Town collated comment on the above referenced circulated EIA. 	<p>Email response provided 13 December 2024:</p> <ol style="list-style-type: none"> 1. Thank you for the email and comments attached.
		<p>Letter received via email dated 13 December 2024:</p> <p>PORTION 10 OF PAARL FARM 724, REMAINDER OF PAARL FARM 724, PORTION 23 OF PAARL FARM 724, PORTION 7 OF PAARL FARM 942, REMAINDER OF PAARL FARM 474, PORTION 3 OF PAARL FARM 474 AND PORTION 4 OF PAARL FARM 474, FISANTEKRAAL: DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT - PROPOSED EXPANSION OF CAPE WINELANDS AIRPORT (CWA) - DEA&DP Ref No: 16/3/3/2/A5/20/2046/24.</p> <p>The City of Cape Town has delegated certain powers to the Executive Director and Director, Spatial Planning & Environment, to make comments, objections and representation in a basic assessment, full scoping or other environmental impact assessment processes, and on an advertised report or submission, including applications for exemption from any provision of the National Environmental Management Act or specific Environmental Management Act. The collated comment below are given in terms of these delegations (dated 20 June 2023 and 25 July 2024 and sub-delegations of 14 October 2024).</p> <p>Your email correspondence and accompanying Notification letter dated 13 November 2024 and the Draft Environmental Impact Assessment Report (dated November 2024), pertaining to the proposed expansion of the existing Cape Winelands Airport (CWA) on Portion 10 of Paarl Farm 724, Remainder of Paarl Farm 724, Portion 23 of Paarl Farm 724, Portion 7 of Paarl Farm 942, Remainder of Paarl Farm 474, Portion 3 of Paarl Farm 474 and Portion 4 of Paarl Farm 474, Fisantekraal, refer.</p> <p>It is recorded that the City of Cape Town (the City) provided comment on the Pre-Application Scoping Report, dated 18 January 2024 and on the Draft Scoping Report, dated 23 August 2024.</p>	

		<p>The following technical comment is provided by the relevant City of Cape Town Departments based on the information provided in the Draft Environmental Impact Assessment Report (DEIAR) and accompanying documentation:</p> <p>1. Spatial Planning and Environment: Urban Planning and Design (UPD) Department</p> <p>The UPD Department’s previous comments highlighted issues of concern, and verified the accuracy of information regarding the interpretation of spatial policy from the department’s mandate and in accordance to the City’s approved spatial policies the Municipal Spatial Development Framework (MSDF) and the Northern District Plan.</p> <p>1.1. Previous concern: The main concern previously raised required clarity on the phasing of the airport development, which was not clearly defined especially concerning the noise and engineering infrastructure network demand planning.</p> <p>1.1.1. This is necessary to prevent the under representation of the potential impact of the development on noise, infrastructure networks and surrounding land uses.</p> <p>1.1.2. The EAP’s response clarified that there are two phases proposed for the proposed expansion. The first phase is to start once authorisations are issued and phase 2 will be triggered by growth in passenger numbers. This remains a concern for the UPD Department’s understanding of the spatial implications.</p> <p>1.1.3. In term of infrastructure planning, UPD notes that the City’s infrastructure departments will have to highlight the gaps and indicate if the information given for the two phases are adequate.</p> <p>1.2. Previous concern: The submitted noise impact as part of the previous EIA was not comprehensive and only alluded to the ambient baseline noise environment around the CWA.</p> <p>1.2.1. CWA acknowledged the concerns raised and have indicated that the Noise Impact Assessment will be conducted and provided in the now DEAIR for comment. Furthermore, CWA indicated that it was working closely with appointed specialists to ensure comprehensive</p>	<p>1.</p> <p>1.1 Noted</p> <p>1.1.1 EAP response: An extensive project description and SDP per Phase was included for consideration in the draft EIAR. Each Phase also provided a more detailed SDP breakdown per Precinct.</p> <p>1.1.2 EAP response: The project description per Phase and precinct has been included in the amended draft EIAR. It provides more detail on what is planned per Phase (1 and 2) and the breakdown per precinct. This is also visually illustrated in Appendix 25 SDP plans per Phase and per precinct.</p> <p>1.1.3 Noted</p> <p>1.2 EAP response: There was no previous Noise IA submitted with the Scoping Phase. A Baseline Noise study was included as required for the Scoping Phase of an EIA process. The Noise IA was submitted with the draft EIAR for consideration.</p> <p>1.2.1 EAP response: The Noise IA was submitted with the draft EIAR for consideration.</p>
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		<p>assessments of potential impacts and implement mitigation measures as legally required. As such, UPD will also take lead from inputs provided by the City’s Environmental Health Departments and Province about the acceptable noise levels on surrounding residential communities that will be impacted by the expansion.</p> <p>1.2.2. Noise is a significant impact, not at the start of the airport, but more so at maturity stages, similarly to the Cape Town International Airport (CTIA). Hence, the noise impact assessment needs to model the noise impact at stages of full operation of Phase 2.</p> <p>1.3. Previous concern: An under representation of existing and latent land use rights in the vicinity of the CWA.</p> <p>1.3.1. The UPD notes the comments provided including the formally expired or lapsed rights not taken up by applicants of these lands parcels, as well as the responses given in terms of conceptual diagram used by the Department to illustrate the location of development proposals surrounding CWA.</p> <p>1.3.2. The UPD Department would like to clarify that the conceptual diagram was used for orientation in order to indicate developments its comments were referring to and not to create confusion among stakeholders of CWA.</p> <p>1.4. Previous concern: The Regional role of Cape Winelands Airport based on the end state to develop the airfield into a fully commercial airport with very limited detail in-between to inform approval of this EIA.</p> <p>1.4.1. The UPD Department highlighted that this limits the Department in evaluating the symbiotic or conflicting roles of the CWA compared to CTIA etc.</p> <p>1.4.2. The response given in this regard is sufficient. It remains important that the public and the City get a clear picture of the relationship and phased development planned for CWA compared to the existing nature, scale and functions fulfilled by the George International Airport as well as the CTIA.</p>	<p>1.2.2 EAP response: The Noise Impact Assessment models the noise impact at full operation in Phase 2 (Scenario 3).</p> <p>1.3 1. Noted</p> <p>1.3.2 Noted</p> <p>1.4.1 Noted</p> <p>1.4.2 Noted</p> <p>Response from CWA: The airports are intended to complement each other in ensuring unfettered air access into Cape Town and the Western Cape, offering greater and much needed capacity, redundancy, choice and competitive/affordable air travel.</p>
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		<p>2. Spatial Planning and Environment: Development Management Department</p> <p>2.1. The existing Cape Winelands Airport has a zoning of Transport Zone 1 (TR1) and an approval for Councils consent to accommodate an airport. The proposal to extend the existing operations of the Cape Winelands Airport will require a land use management application for the amendment of the approved Site Development Plan and the relevant conditions imposed with the approval of the Rezoning and Consent use.</p> <p>2.2. Furthermore, an application will further be required for the rezoning, consolidation, consent use and any other application as prescribed for the additional land portions required for the proposed extension.</p> <p>2.3. A formal pre-consultation meeting is required prior to the submission of the development application. It is worthy to note that a pre-consultation meeting has been scheduled where relevant aspects of the development proposal will be discussed.</p> <p>3. Human Settlements: Forward Planning</p> <p><u>Department Human Settlement Development</u></p> <p>3.1. The Greenville Garden City development is providing opportunities for affordable human settlement development. The overall development plans to provide 14 562 residential opportunities (state-assisted, finance linked and market), including business and industrial GLA.</p> <p>3.2. The expansion of the airport will have a significant impact on the noise levels, traffic congestion and potentially securing open market opportunities.</p>	<p>2.</p> <p>2.1. Noted</p> <p>2.2. Noted</p> <p>2.3. The pre-consultation meeting took place on 04 December 2024</p> <p>3.</p> <p>3.1 In keeping with an integrated planning approach, it is CWA’s aspiration to collaborate with Garden Cities to ensure compatible land use and to help both developments reach its full potential, to the benefit of all role players – most especially the residents of Fisantekraal.</p> <p>3.2 Response from specialist: Noted and pointing out that most of this area is not negatively impacted upon by the airport extension and would indeed be positively impacted upon in terms of potential job opportunities and economic growth generated by the construction and aviation activities, and also by the growth stimulus the airport activities could have on the nearby dormant industrial areas. The impact on Greenville should not be assessed through monofunctional housing lens. An Integrated Human Settlements approach should encourage job opportunities near dormitory settlements such as Greenville and Fisantekraal. The traffic impact was assessed in Appendix 25 to the draft EIAR and for phase 1 there will be 600 new trips during the AM peak hour (467 in /</p>
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			<p>134 out) and 1 200 new trips during the PM peak hour. This impact is not significant and can easily be mitigated by implementing the specified road improvements. From the Greenville Development perspective, it should be noted that these traffic flows would be countercyclical to those of Greenville residents. Should the airport provide job opportunities to some Greenville residents, or airport employees move to Greenville, the Airport extensions will arguably improve the commuting experience for all existing and future Greenville residents. The existing airport which has been in place for 80 years and from a noise perspective CWA has no impact on Phase/Parcel 1,2 and 3. Phase/Parcel 4 zoning rights have expired and Phase/Parcels 5-7 are conceptual, which presents an opportunity for compatible land use planning. Even with no further development of the airport, the Noise Impact Assessment (Appendix 4, Scenario 1) states that noise rating level LRdn noise contour of 55 dB(A) extends beyond the R312 towards the south, within the Greenville Garden City and covers a zone of approximately 0.44 km². Within this zone it would not be recommended to establish residences, without providing additional noise mitigation measures. Scenario 2, (the first phase of the development) is in fact an improvement on the “do nothing” scenario. Scenario 3 (the final development project for 2050) increases the areas south of the airport that falls within the 55 dB(A) zone. Mitigation measures are proposed. To put matters in perspective it should be noted that not all of Greenville’s further residential development potential is negatively impacted upon and secondly, the 55 dB(A) standard is considerably higher than that set for CTIA.</p> <p>The Tygerberg District Plan sets the following development guidelines for residential noise levels at CTIA:</p> <p>“1. Residential uses are not recommended above the 65-dBa noise contour zone of the CTIA (or any other airport) planned primary runway, which is to be realigned, as well as the planned secondary runway. No new residential developments should be encouraged within the affected areas without noise mitigation measures in place. Noise zones indicated are not fixed and are subject to future refinement.</p>
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		<p><u>Noise Impact Assessment, dated October 2024, compiled by DDA Environmental Engineers</u></p> <p>3.3. The Noise Impact Assessment has included Greenville Garden City in its assessment. Noise impact will be monitored during the construction phases and operational phases of the proposed airport expansion.</p> <p>3.4. The noise impact is still a concern for the existing and future development of Greenville Garden Cities and will need to be mitigated and managed for the surrounding residents.</p> <p><u>Socio-economic Impact, dated October 2024, compiled by Multi-purpose Business Solutions cc</u></p> <p>3.5. The Socio-economic Impact Assessment concludes that there will be considerate impacts on the local community during the construction phase. Proper alignment of other construction projects is required to ensure traffic is not compromised.</p> <p>3.6. An approved programme and alignment with Greenville Garden Cities needs to be approved to ensure that the greater community is not negatively impacted during the construction phases of the proposed airport expansion.</p> <p><u>Transport Impact Assessment, dated 23 September 2024, compiled by ITS Consulting Engineers</u></p> <p>3.7. The transport assessment mainly indicates the challenges to traffic during the construction phases. The alignment of the relevant construction projects is important to not delay or impact on Greenville and the surrounding neighbourhoods.</p>	<p>2. Non-residential (industrial and commercial) uses may be accommodated above the 65-dBa noise contour, provided that mitigating measures against the noise pollution are put in place.</p> <p>The recommendation in the Noise Impact Assessment for CWA (App 25) is that residential development above the 55 dB(A) level is not recommended at CWA. This is 10 dB(A) lower than the district plan guidelines for CTIA. It should be noted that the decibel scale is a logarithmic scale. A 10-decibel increase in sound levels represents ten times as much sound energy and will be perceived as a doubling of sound loudness.</p> <p>3.3 Noted</p> <p>3.4 Refer responses above</p> <p>3.5 – 3.6. Response from Multipurpose Business Solutions: This will be made a condition of approval and added to the recommendations for mitigation of impacts.</p> <p>3.7. Noted</p>
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		<p><u>Recommendations</u></p> <p>3.8. The above-mentioned comments should be taken into cognisance in the Cape Winelands Airport Expansion EIA process.</p> <p>3.9. The Greenville Garden City existing development and future phases of the project must be taken into consideration during the EIA process. Alignment with the construction phases of both Greenville Garden City and the airport expansion is vital.</p> <p>4. Economic Growth: Policy and Strategy: Economic Analysis Department</p> <p>The Economic Analysis Department provided the following comment on the Socio-Economic Assessment Report, dated October 2024, compiled by Multi-purpose Business Solutions cc:</p> <p><u>Development Alternatives</u></p> <p>4.1. The report considers the impact of an influx of jobseekers, risk of informal settlements, property value impact and bulk infrastructure requirements as low, both during the construction and operational phases, and justifies this assessment with the following points:</p> <p><i>Localized Hiring Emphasis</i></p> <p>4.1.1. Contractors are encouraged to employ people from the immediate area as part of a procurement strategy designed to prioritize local labour (page 4 and 61). This measure aims to limit the attraction of jobseekers from outside the area and reduce the strain on local resources.</p> <p><i>Pre-Construction Mitigation Measures</i></p> <p>4.1.2. Communication protocols with residents aim to manage expectations and inform local communities about job opportunities, reducing potential disputes or misunderstandings about hiring practices (page 4).</p> <p>Security Measures</p>	<p>3.8. Noted</p> <p>3.9. Noted</p> <p>4.</p> <p>4.1. Noted</p>
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4.1.3. The report suggests that effective on-site security and controlled access will reduce the risk of jobseekers trespassing or informally settling near the development area (page 63).

Existing Developments

4.1.4. Nearby developments such as Greenville Garden City provide formal housing and employment training facilities, which are expected to absorb some demand for jobs and housing (page 22).

Assessing the Motivations

4.2. While the report provides a clear framework for mitigating the impact of jobseekers, it underestimates the potential for secondary socio-economic effects, especially given the local context of unemployment and poverty. Additional measures, such as formal monitoring systems and contingency plans for larger-than-expected migration are to be included and assessed.

Risk of Over-reliance on Local Employment

4.3. The success of the local hiring strategy will depend on the availability of a sufficiently skilled workforce in the immediate area. If local labour does not meet the required skills, contractors might hire from outside, potentially increasing the influx of jobseekers.

Socio-Economic Conditions in Fisantekraal

4.4. The report on page 22 identifies high unemployment and low income levels in nearby areas like Fisantekraal. These conditions may drive larger-than-anticipated numbers of jobseekers to the site, straining the mitigation measures.

4.5. Even with limited formal employment opportunities, informal markets, crime, or social tensions could emerge if large numbers of people migrate without adequate integration into the local economy.

Sense of Place and Property Values

4.6. The assessment of "very low" to "low" impacts on residential property values and sense of place on pages 70 and 80 is insufficiently

4.2. Response from Multipurpose Business Solutions: This will be made a condition of approval and added to the recommendations proposed to mitigate impacts

4.3. Response from Multipurpose Business Solutions: This is more of a comment and would be a consequence of limited local labour and those persons with the appropriate skills. The aim of the strategy is to ensure that locals are given an opportunity first and where appropriate. Thereafter labour from outside the local area would invariably be sourced from outside the local area.

4.4. Response from Multipurpose Business Solutions: This outcome is possible but unknown at this stage. We would recommend the preparation of a Social Engagement Plan to address these potential outcomes and will include it in the recommendations to address the concern and provide an underpin for mitigation. This forms part of post approval stakeholder engagement.

4.5. Response from Multipurpose Business Solutions: Refer 4.4.

4.6. Response from Multipurpose Business Solutions: Note that the "very low" and "low" assessments relate to the residual impacts, i.e. AFTER effective mitigation.

substantiated. The analysis does not account for subjective and long-term community perceptions of noise, traffic, and industrialization.

Cumulative Effects

4.7. The cumulative effects of concurrent developments in the Northern District (e.g. Greenville Garden City, industrial projects) are acknowledged on page 23 but inadequately explored. Their combined effects on infrastructure, housing demand, and local economies of associated developments more generally are under examined.

5. Urban Mobility: Transport Impact Assessment and Development Control (TIA&DC) Branch

5.1. It is recorded that meetings between the applicant's Transport Engineer, City officials from the Urban Mobility Directorate and transport engineers involved with the Bella Riva and Greenville developments to the west and south of the airport site have been held on the following dates:

- 13 August 2024,
- 29 August 2024,
- 5 September 2024,
- 12 September 2024,
- 24 October 2024, and
- 7 November 2024.

5.2. The DEIAR is accompanied by, inter alia, a Transport Impact Assessment (TIA) (First Draft), dated 23 September 2024, compiled by ITS Consulting Engineers.

5.2.1. It should be noted that since the drafting of the above-mentioned TIA, the applicant's transport consultant has had two further technical meetings with the City's Transport Planning and Roads Infrastructure Management Departments to further refine the TIA.

4.7. Response from EAP: Refer to amended Socio-economic Impact Assessment in Appendix 23.

5.
5.1 Noted

5.2 Noted

		<p>5.3. The TIA&DC Branch’s previous comments has acknowledged and responded to in the Comments and Responses Report (Appendix 30B).</p> <p>5.4. In response to TIA&DC Branch’s requirement for a road link from the airport activities to the area to the east of the airport, the EAP stated that: “Expansion of the CWA or any related land-uses to the East of the current SDF, will require a separate land use application. Development between the airport and the R304 is not foreseen in the near future and is not part of this application.” The proposals from the Bella Riva developer to increase the proposed airport related uses in their development to the west of the airport are acknowledged. However, the application should at least indicate that sufficient land is available in order for such link to be established when the area to the east of the airport is developed in future.</p> <p>5.5. As stated in Point 5.1, the TIA&DC Branch have already had further discussions with the applicant’s transport engineer after the drafting of the September 2024 TIA distributed for comment, although the specific TIA itself was not presented for discussion.</p> <p>5.6. In order to evaluate the impact of the proposed development on the transport network and comment on the detail presented in the TIA, the following broader issues should be addressed in more detail:</p> <p>5.6.1. How the impact of the 350 000m² Commercial GLA noted in the DEIAR is analysed in the TIA.</p>	<p>5.3 Noted</p> <p>5.4 Noted</p> <p>5.5 Noted</p> <p>5.6</p> <p>5.6.1 Response from CWA:</p> <p>The City of Cape Town’s request for confirmation regarding the basis of the 350,000m² Gross Lettable Area (GLA) noted in the Draft Environmental Impact Assessment Report (DEIAR) and its alignment with the Traffic Impact Assessment (TIA) refers:</p> <p>Alignment of GLA Across EIA Phases and TIA:</p> <p>The total GLA of 350,000m² has been consistently applied across both the DEIAR and the TIA. Below is the detailed breakdown of GLA across the two EIA phases, which corresponds directly with the TIA:</p> <p>Phase 1 (TIA PAL 1B: Horizon Year 2032):</p> <ul style="list-style-type: none"> • Airport: 100,248m² • Filling Station: 1 station (1,361m²) • Hotel: 1 hotel with 150 rooms (4,721m²)
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			<ul style="list-style-type: none"> • Offices: 25,543m² • Shopping Centre (Retail/Restaurants/Shops): 18,540m² • Warehousing and Distribution: 26,567m² • Total GLA: 176,980m² <p>Phase 2 (TIA PAL 4: Horizon Year 2050):</p> <ul style="list-style-type: none"> • Airport: 84,410m² • Hotel: 1 hotel with 150 rooms (4,721m²) • Offices: 28,058m² • Warehousing and Distribution: 55,831m² • Total GLA: 173,020m² <p>Grand Total Across Both Phases:</p> <ul style="list-style-type: none"> • Airport GLA: 184,658m² • Commercial GLA: 165,343m² • Total GLA: 350,000m² <p>Definition and Traffic Assumptions for Airport Use:</p> <p>The buildings classified under "Airport" align fully with the definition of Airport Use as stated in applicable regulations:</p> <p>“‘Airport’ means a complex comprising aircraft runways and associated buildings for the take-off and landing of civilian aircraft, as well as facilities for the handling and storage of air freight.”</p> <p>This definition includes facilities required for the functioning of an airport, such as passenger terminals, cargo handling buildings, and supporting infrastructure.</p> <p>The traffic numbers for these Airport Use buildings have been calculated based on benchmarks derived from the Cape Town International Airport (CTIA). The benchmarked trip generation rates are as follows:</p> <ul style="list-style-type: none"> • 136.34 trips in the peak AM hour per million passengers
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		<p>5.6.2. Background traffic growth on the network.</p> <p>5.6.3. Road reserve availability in order to implement the required transport improvements.</p> <p><u>Recommendation</u></p> <p>5.7. It is therefore recommended that applicant continue with the current engagement with the City’s Urban Mobility Directorate as well as Provincial and National role players as well as surrounding developers in</p>	<ul style="list-style-type: none"> • 253.64 trips in the peak PM hour per million passengers <p>These rates were applied to the passenger projections of 2.5 million passengers in 2032 (PAL 1B) and 5.2 million passengers in 2050 (PAL 4) to calculate the anticipated traffic impact generated by Airport Use buildings.</p> <p>Consistency Between DEIAR and TIA:</p> <p>The following points highlight the consistency between the DEIAR and the TIA:</p> <ol style="list-style-type: none"> 1. GLA Figures: The GLA for airport facilities, offices, warehousing, retail, and hotels in the DEIAR matches the figures analyzed in the TIA. 2. Hotel Room Numbers: The DEIAR specifies 1 hotel with 150 rooms in Phase 1, expanding to 2 hotels with a total of 300 rooms by Phase 2, which aligns with the assumptions used in the TIA. 3. Airport GLA: The Airport GLA of 184,658 m², distributed across both phases, aligns with the operational requirements and phasing considered in the TIA. 4. Traffic Benchmarks: The traffic generation rates for Airport Use buildings are benchmarked against CTIA trip rates, ensuring the projections are realistic and consistent with industry standards. <p>Conclusion:</p> <p>The 350,000m² GLA, including the Airport GLA of 184,658m², and the number of hotel rooms specified in the DEIAR, are consistent with the assumptions used in the TIA. The Airport Use buildings align with the regulatory definition, and the traffic numbers have been calculated using benchmarks from CTIA, ensuring robust and accurate modelling of impacts.</p> <p>5.6.2 EAP response: the TIA has been amended to consider this request.</p> <p>5.6.3 EAP response: the TIA has been amended to consider this request.</p> <p>5.7 Noted</p>
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		<p>order to resolve the above-mentioned issues as well as other more technical matters to be addressed in an updated TIA.</p> <p>5.8. In addition to the input provided above, further detailed comments on the development will be provided during the land use management application submission, including comments regarding the detail of transport infrastructure required for each development phase at the time of development.</p> <p>6. Safety and Security: Fire and Life Safety</p> <p>6.1. SANS 10400–T: 2024 and the Community Fire Safety By-law, Provincial Gazette 5832 (as amended 29 June 2007 and 21 August 2015) is to be complied. In this regard:</p> <p>6.1.1. A Fire Engineer (ECSA Registered) shall be appointed for this project.</p> <p>6.1.2. A Complete and Detailed Fire Protection Plan, for all the proposed buildings are required to be submitted during building plan submission for scrutinizing and approval.</p> <p>6.1.2.1. Fire hydrants to be provided as per SANS 10400 – T4.35.</p> <p>6.1.2.2. Provide access for emergency vehicles complying with the Community Fire Safety By-law.</p> <p>6.1.2.3. Section 12 Provision of water for Fire Fighting (SANS 10400-W: 2011).</p> <p>6.1.3. Storage and use of Flammable substances shall comply with Chapter 8 of the Community Fire Safety By-law.</p> <p>The above requirements are to be included under Section 4.1.11 of the EMPr, as well as in the Veldfire Management Plan and Emergency Preparedness and Response Plan annexures.</p> <p>7. Community Services and Health: Environmental Health Department</p> <p>The Environmental Health Department advised of the following applicable requirement from an environmental health point of view:</p>	<p>5.8 Noted</p> <p>6. Response from CWA: All SANS requirements and standards will be fully complied with. In addition the airport will have a 24/7 dedicated on-site Airport Fire & Rescue Team, including a dedicated Fire Prevention Officer.</p> <p>The on-site Fire & Rescue Team will respond to incidents related to aircraft arrivals and departures, structural fires on site and veld fires on site or on surrounding and neighbouring properties.</p> <p>The on-site Fire & Rescue Team will have Memorandums of Agreements with the various Emergency, Fire & Rescue services in the greater Metro to deal with large scale emergencies and incidents.</p> <p>To be included in EMPr where appropriate.</p> <p>7. The use of chicken manure for the biodigester has been removed.</p>
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		<p>7.1. An odour and fly control management plan during the storage of chicken manure before usage in the bio-digester must be addressed in the Final Environmental Management Programme (EMPr).</p> <p>8. Community Services and Health: Air Quality Management (AQM) Unit</p> <p>Air Quality Impact Assessment Report (AQIAR) dated 11 November 2024, compiled by DDA Environmental Engineers</p> <p>8.1. The AQIAR was reviewed, taking into considering compliance with the following legislative requirements:</p> <ul style="list-style-type: none"> • National Ambient Air Quality Standards in terms of GN No 1210 of 24 December 2009, of NEM: AQA, 2004. • Regulations regarding Air Dispersion Modelling, R 533 of July 2014 promulgated under NEM: AQA (Act 39 of 2004). • Regulations prescribing the format of the Atmospheric Impact Report (AIR), R747 of 11 October 2013. <p>8.2. Based on the review of the AQIAR, the following were noted:</p> <p>8.2.1. Three operational scenarios were included in the atmospheric impact assessment study, which are:</p> <ul style="list-style-type: none"> • Scenario 1: Existing runways at full capacity (No-Go Alternative); • Scenario 2: New runway during its operational year; and • Scenario 3: New runway at full capacity. <p>8.2.2. Emissions were simulated using the AEDT model.</p> <p>8.2.3. Ambient concentrations were computed for time periods stipulated in the South African National Ambient Air Quality Standards, i.e. maximum 1-hr (99th percentile), 24-hr (99th percentile) and annual ambient concentrations.</p> <p>8.2.4. The potential human health risks were estimated utilising recommended coefficients, expressing the relative risks for short- and long-term exposure to various air pollutants.</p>	<p>8.</p> <p>8.1 Noted</p> <p>8.2 Noted</p>
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		<p>8.2.5. The Health Effects of Air Pollution i.e. Carbon monoxide (CO) Nitrogen dioxide (NO2) Sulphur dioxide (SO2) Particulate matter-PM10 and PM2.5, were included.</p> <p>8.2.6. It is noted, for short term exposure health effects to PM10, SO2 and NO2; and long term exposure health effects to SO2, NO2 and O3 PM2.5, the coefficients specified by the Committee on the Medical Effects of Air Pollutants (COMEAP), were used.</p> <p>8.2.7. The available measured ambient concentrations from 2021 to 2023 from three stations were obtained, being Wallacedene Station, 10 km south of the CWA; Paarl Station, 21 km east of the CWA; and Stellenbosch Station, 22 km to the southeast of the CWA.</p> <p>8.2.8. Four-years (2020-2023) of hourly meteorological data from the Cape Town International Airport weather station, was used for the establishment of the local wind field as wind roses.</p> <p>8.2.9. The wind roses were generated for all hours, daytime, night-time, as well as for the winter and summer periods and are illustrated in the figures below.</p> <p>8.3. Dust Emissions during Construction Phase</p> <p>8.3.1. The magnitude of emissions, which may be generated from construction operations, was estimated with the use of the USEPA emission factors for construction activity operations, which are based on field measurements of total suspended particulates (TSP).</p> <p>8.3.2. From the above-mentioned equation, the unmitigated daily TSP emission per hectare (ha) is approximately 90 kg and for PM10 approximately 31.4 kg.</p> <p>8.3.3. Since the unmitigated dust generation during construction may cause nuisance, dust suppression measures are recommended to be carried out to minimise the impact.</p> <p>8.3.4. The achievable dust control efficiency with wet suppression for materials handling and unpaved roads is 75%. The unpaved road</p>	<p>8.3 Noted</p> <p>8.3.3. EAP response: The requirement for dust mitigation measures during construction has been included in the EMPr.</p> <p>8.3.4 EAP response: Dust suppression has been included in EMPr.</p>
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emissions can be reduced further to approximately 90% with the use of dust suppression chemicals.

Dust suppression measures are recommended in order to reduce any possible impacts. This must be included in the EMPr.

8.4. Operational Phase Emissions

8.4.1. It is noted in the report that due to the low vapour pressure of the Jet-A1 fuel, the potential emissions from the storage tanks will be low and are considered insignificant. As such, due to the expected very low emissions from the fuel storage tanks, the emissions were not included in the dispersion modelling calculations. The AQM Unit is of the view that emissions from the fuel storage tanks must be included in the dispersion modelling in order to provide a complete assessment of the impact of the main NEM: AQA listed Activity being conducted at the site.

8.5. Dispersion Simulation

8.5.1. The latest AEDT model has been used to estimate the contribution of the sources of pollution to the ambient pollutant concentrations.

8.5.2. AEDT uses the EPA's atmospheric dispersion modelling system, the American Meteorological Society (AMS)/EPA Regulatory Model (AERMOD), to estimate air quality impacts of airport-related emissions. In the study, only the two components of AERMOD and AERMET were used, since the terrain of the study area is flat.

8.5.3. Dispersion Simulation Results

8.5.3.1. Scenario 1: Existing runways at full capacity (No-Go Alternative): The maximum 1-hr ground level NO₂ concentrations exceeded the 1-hr guideline value of 200 µg/m³ within a very small area immediately south of the runways; however, the frequency of exceedance was well below the guideline of 88 times per annum. It is noted the Table does not indicate the exceedance, which must be reflected.

8.4 Specialist response:

For completion purposes, the emissions from the fuel storage tanks will be included in the dispersion modelling results, as requested.

8.5

8.5.1 Noted

8.5.2 Noted

8.5.3.1 Specialist response:

The number of exceedances was 1 and will be indicated in the text.

For Scenario 1, the receptor concentrations table does not indicate the above-mentioned exceedance number, as there were no exceedances at any of the discrete and sensitive receptors.

The number of exceedances will be included in the receptors concentrations table for Scenario 3, as there was one receptor with an exceedance.

		<p>8.5.3.2. For all other measured pollutants, the concentrations were below the respective guideline.</p> <p>8.5.3.3. Scenario 3: New runway at full capacity. The 1-hr guideline of 200 µg/m³ for NO₂ was exceeded in a small area south and north of the runway. However, the exceedance number per year was only 2 and below the allowable exceedances of 88 per year.</p> <p>8.5.3.4. It is noted the contour concentration figures were not generated for the new runway for the operational year (Scenario 2), since the emissions were very low and Scenario 3 is considered the worst-case for the new runway. The AQM Unit finds this acceptable.</p> <p>8.6. Cumulative Assessment</p> <p>8.6.1. The following existing emission sources within the study area, which are within a 5 km radius of the project area were used being:</p> <ul style="list-style-type: none"> • Fisantekraal Wastewater Treatment Works (WWTW), located less than 1 km away from the project site to the northwest; • County Fair Primary Processing Plant, located approximately 2 km south of the CWA; • Claytile brick factory, located approximately 4 km from the CWA to the southeast; and • Clay Industry brick factory, located approximately 5 km southwest of the CWA. <p>However, it is noted ICSA Durbanville crematorium, which is also within the 5km radius was not included. Reasoning for this omission is to be provided.</p> <p>8.6.2. Table 5-5. Scenario 3: Cumulative Modelled Maximum Concentrations at Sensitive Receptors, indicate an exceedance of the 1-hr guideline of 200 µg/m³ for NO₂.</p>	<p>8.5.3.2 Noted</p> <p>8.5.3.3. Noted</p> <p>8.5.3.4. Noted</p> <p>8.6.1 Specialist response:</p> <p>The emission data for the ISCA Durbanville crematorium were not available at the time of the cumulative dispersion modelling. This data has been requested from ISCA, and it was communicated that it will be provided once authorisation from the organisation’s managers is granted.</p> <p>It should be noted, however, that based on the emissions and air quality impact studies that DDA has performed for similar crematoriums, such as the Maitland crematorium and the Wellington crematorium, the zone of influence around the ISCA Durbanville crematorium is not expected to exceed more than 500m.</p> <p>The cumulative concentrations for CO, NO_x and PM₁₀ are not expected have any significant changes from the ones indicated in the cumulative tables of the report.</p> <p>The only receptors that may be affected from the crematorium operations are primarily those within the Darwin Industrial Park area.</p> <p>8.6.2 Specialist response: General comment, no change is required.</p>
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		<p>8.8. The following recommendations/mitigation measures as contained in the AQIAR are endorsed:</p> <p>8.8.1. Dust monitoring along the western, southern and northern boundaries of the site is recommended to be conducted on a monthly basis during construction and to be reported quarterly to the authorities (page 6-1).</p> <p>8.8.2. For Scenario 3, a number of mitigation measures should be considered for implementation in consultation on with the various stakeholders associated with all the airport operations (page 6-4):</p> <ul style="list-style-type: none"> • Encourage airport-compatible land-use planning. • Implement measures to decrease the queuing lines. • Limit the length of the course of taxiing. • Shutting down as many engines as possible when idling and taxiing. • Reduce reverse thrust use during landing. • Utilise aircraft-serving equipment with “cleaner” technology. • Investigate the provision of electricity at terminal gates, to minimise use of the APUs and GSE as much as possible. <p>8.9. The following comments are provided for corrections and re-submission:</p> <p>8.9.1. The report does not comply with the Regulations prescribing the format of the Atmospheric Impact Report (AIR), R747 of 11 October 2013, therefore must be corrected.</p>	<p>The Occupational Health and Safety standards for the airport workers should be enforced and the air pollutants monitored in accordance with the Hazardous Chemical Substances Regulations</p> <p>8.8</p> <p>8.8.1 Noted</p> <p>8.8.2 Noted</p> <p>8.9 Specialist response:</p> <p>8.9.1. The main sections as indicated in the Atmospheric Impact Report (AIR), R747 of 11 October 2013 are included in the Air Quality Impact report.</p> <p>The prescribed specific format is more orientated towards facilities requiring an AEL. However, the airport is not a listed activity and won't be applying for</p>
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		<p>8.9.2. Provide all input data used in the study to the AQM Unit.</p> <p>8.9.3. Fugitive Emissions from all sources are to be included in the study.</p> <p>8.9.4. The AQM Unit recommends that an Emergency Preparedness Plan be developed and incorporated in the EMPr as a condition of approval should the Environmental Authorisation be issued. Similarly, a site specific Leak Detection and Repair (LDAR) programme will be required to be developed as a preventative</p>	<p>an AEL in near future. As such, the prescribed format was not followed, it avoids unnecessary details related to AEL applications.</p> <p>8.9.2. The input data will be provided to the AQM unit.</p> <p>It should be noted that these will be in separate documents as there were various cumulative sources included. In addition, as indicated in the report, the AEDT generate enormous input files. This is because hourly emissions need to be generated for each source for as many pollutants examined and as many years considered, according to the meteorological input files, i.e. 2020 to 2023. These emission files are in the order of 2.1GB for each pollutant.</p> <p>8.9.3. The main emission source from all the airport operations and ground support equipment were included in the AQIA.</p> <p>The main fugitive sources that may potentially contribute to the overall emissions in very small quantities and infrequently are:</p> <ul style="list-style-type: none"> • Fire Training Areas – Smoke and gas emissions from live fire drills. • Paint and Solvent Use – VOCs from aircraft and facility maintenance activities. • De-icing and Anti-Icing Activities – Evaporation of propylene or ethylene glycol solutions releases VOCs. • Spilled Fuel and Fluids: Fuel leaks, hydraulic fluids, and oil contribute to hydrocarbon emissions. <p>However, no specific information for the locations and their quantities was available and as such these were not initially indicated in the report.</p> <p>A section listing the above-mentioned fugitive sources was added in the report.</p> <p>8.9.4. EAP response: An Emergency Preparedness and Response Plan forms part of the EMPr.</p> <p>A Leak Detection and Repair (LDAR) programme will form part of the Emergency Preparedness & Response Plan. This is stipulated in the EMPr under operational GOAL 11: EMERGENCY PREPARDNESS AND RESPONSE</p>
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		<p>measure to mitigate emissions to atmosphere and any leaks from fuel tanks and related infrastructure as well as any spillages during re-fuelling of the tanks.</p> <p>8.9.5. A complaints register must be put in place at the site.</p> <p>9. Community Services and Health: Noise Control Administration Unit</p> <p><u>Noise Impact Assessment (NIA), dated October 2024, compiled by DDA Environmental Engineers</u></p> <p>9.1. The methodology used to carry out the NIA is deemed acceptable and in line with South African (SANS 10117: 2008) and international guidelines (INM), relevant to the field of study and proposed development. Regulation 4 of the Western Cape Noise Control Regulations PN200/2023 is legally applicable and the NIA was scrutinised in light of provisions of this regulation.</p> <p>Discussion</p> <p>9.2. Three scenarios are identified in the NIA. It was acknowledged that the scenario 1, where the status quo remain, is the no-go option. Scenario 3 (the desired option) where the CWA develops as a full operational airport catering to both national and international business with a commercial hub was the focus of the Noise Unit’s perusal.</p> <p>9.3. The Noise Unit noted the following environmental noise concerns</p> <p>9.3.1. The CWA is planned within a district with existing noise sensitive receptors as well as developments, which are in varying stages of progress. These developments are mainly orientated to introduce noise sensitive receptors, into the area.</p> <p>9.3.2. The Northern part of the receiving environment is considered a rural environment (Table 2: SANS 10103:2008). The pending impact on the said environment’s noise register is unquestionable, irrespective of whether the noise district’s applicable rating levels will be complied to.</p>	<p>MANAGEMENT. The Emergency Preparedness & Response Plan will become a Condition of Approval in the EA, if granted.</p> <p>8.9.5. A complaints register forms part of the Noise Monitoring Committee requirement during the operational phase of the proposed project.</p> <p>9.</p> <p>9.1 Noted</p> <p>9.2 Noted</p> <p>9.3.1 Noted</p> <p>9.3.2 Noted</p>
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9.3.3. The receiving environment will experience an immense change with the development of the CWA and the main concern is whether any noise mitigation measures applied by the developer will be practical, and achievable, in assuring minimal negative noise exposure over a very long time.

9.3.4. The economical injection to the area, from the CWA is noted, but the developer will retain the responsibility of ensuring environmental noise impacts to receptors and future receptors are not beyond what is tolerable to a reasonable person.

9.3.3 Specialist response:

By nature, airports are unsuitable for highly built-up areas; runways and noise contours are best located in low-intensity land-use zones outside the urban development edge.

The location of the CWA airport provides several opportunities, in terms of the reduction of the aircraft noise impacts from the airport. According to international best practise these are based on:

- Operational procedures: Noise abatement procedures (NAPs) are sets of guidelines and standard operational procedures designed to reduce noise in areas close to airports. They typically include specified flight paths, altitude requirements, and operational settings that pilots should follow during take-off and landing.
- Noise Contour Mapping: Utilizing these maps identification of areas with significant noise exposure can guide decisions on future residential development.
- Land Use Planning: Implementation of zoning regulations that restrict sensitive land uses can prevent future noise-related issues.
- Sound Insulation Measures: For existing sensitive receptors near airports, investing in soundproofing infrastructure can reduce the indoor noise levels.

Continuous monitoring at key locations, as well as at selected noise-sensitive receptors can provide early notification of the gradual increase of the noise impacts through the years, before it reaches the maximum levels and extends predicted in the NIA study.

This, in cooperation with the authorities and the key stakeholders, will provide an additional opportunity to identify, alter and stipulate the optimum combination of the noise mitigation measures early. In addition, via the continuous monitoring these reductions can be verifiable.

9.3.4. Noted. Refer to response above.

Findings of NIA

9.4. Under Paragraph 2.4 on page 5 – Noise Guidelines and Regulations, the following is stated: “The noise impacts due to a proposed project are generally based on the difference between the expected noise level increase and the existing noise levels in the area”. This is very appropriate to the proposed CWA and the receiving environment.

9.5. The NIA makes the following determinations on page 5-30 (see extracts below):

By the time that the new airport and runway 01/19 reaches its capacity, the length of the L_{Rdn} 55 dB(A) impact zone will reach 4 km north of its northern site boundary. The Klipheuwel residential area will be outside this impact zone. The noise level on the south-eastern part of Klipheuwel community is expected to reach 49 dB(A), which is in accordance with the SANS 10103 guideline for Urban Districts with little road traffic.

9.5.1. The Noise Unit, currently regard the Mikpunt station area as a Suburban district with little road traffic, with a night time Noise Rating of 40dB(A).

9.5.2. The said area face the hazard of becoming a high noise impact area, under the proposed scenario 3 conditions.

Towards the south, the 55 dB(A) noise contour will extend less, reaching a distance of 3.3 km. This zone will overlap the Greenville Garden City development and cover an area of approximately 1.03 km².

It should be noted that immediately south of the runway, there will also be a small zone of 0.11 km² within the Greenville Garden City area, where the L_{Rdn} reaches between 60 dB(A) and 63 dB(A).

9.5.3. The Garden City, Greenville Development is a residential development.

9.5.4. The following determination is of concern:

9.4 Noted

9.5.1 & 9.5.2. Specialist response:

Based on the operational schedule for the new runway under full utilisation, most of the daily movements will take place between 08h00 and 18h00, and there will be three night-time operations (see Table 4 9). These night-time operations are programmed to take place before 11h00.

Therefore, after 11h00 the CWA will have no noise impact on the Mikpunt station area (Klipheuwel).

In addition, the noise level on the south-eastern part of Klipheuwel (Mikpunt station) community is expected to reach an LRdn of 49 dB(A), which is in accordance with the SANS 10103 guideline for Urban Districts with little road traffic LRdn of 50 dB(A)).

9.5.3 & 9.5.4. Specialist response:

The Garden City, Greenville Development:

Based on the noise specialist findings and recommendations, the area impacted upon is relatively limited compared to the full development footprint. This area immediately south of the new runway whilst not suitable for residential this area is still available for development, commercial and light industrial.

Towards the Bella Riva area, the L_{50} 55 dB(A) contour will extend approximately 300m from its eastern further most point of this development. The area that is covered by this contour within the Bella Riva development is 0.38 km².

From the N70 day-night contours it is evident that there is an area within the Greenville Garden City that will experience more than 30 events of 70 dB(A) L_{Amax} . This is considered significant, and mitigation measures in terms of appropriate land use planning should be implemented for this zone, which is approximately 1.2 km².

Recommendations of NIA

- 9.6. The opening statement of Clause 5.3.1 is to be emphasized: "It should be noted that even though several mitigation measures have been identified in this section for the airport's operations, the identification of the most suitable and cost effective mitigation measures, together with a realistic time schedule for their implementation, can only be a result of consultations between the various stakeholders associated with all the airport operations, and taking into consideration the safety and security requirements associated with these airport operations."
- 9.7. The recommendations made by the specialist on page 5-32 of the NIA refer:

At this stage of the development, it could be possible to incorporate commercial spaces in the planning by Garden Cities for the Greenville Development.

It should also be noted that the remainder and majority of the Greenville Development remains outside the LRdn 55 dB(A) zone, which makes it available for residential development.

Bella Riva:

The eastern portion of the Bella Riva development, which is impacted by the high number of the N70 events is marked for light industrial and commercial development.

The Bella Riva Pockets 3 and 5 are situated next to the above-mentioned commercial development and are designated for low-density residential use. These pockets will be impacted by 10–20 daily 70dB (L_{Amax}) events. This number of events is not considered significant. It should also be noted that this number of events will only be reached by the year that the airport will reach capacity.

In addition, the night-time N70, will not reach the Bella Riva development, as it is contained within the airport site.

9.6 Noted. Also refer to comment 9.3.3 above.

9.7

- Encourage airport compatible land-use planning via:
 - establishing compatible land use (such as industrial and commercial) to be located around airport facilities.
 - directing incompatible land use (such as houses and schools) away from the airport environs and the runway alignments;
 - Provide incentives for airlines to obtain aircraft with the latest available noise reduction technology, through for example noise-related landing charges.
 - Consider the use of specific take-off or approach procedures (such as Continuous Descent Operations, or steeper landing trajectories) to minimise and optimize the distribution of noise on the ground.
 - Use noise preferential routes to assist aircraft in avoiding noise-sensitive areas, such as Klipheuwel, on departure and arrival, and the use of turns to direct aircraft away from noise-sensitive areas.
 - Consider approaches at slightly steeper angles. A small increase in the glide-path angle to 3.2°, rather than the standard 3.0°, may be feasible and offer scope for noise reduction.
 - Establish and maintain effective communication channels with the affected public and provide real-time information on incoming and outgoing flights and their evolving noise footprints.
 - Consider noise-related operating restrictions for night-time. These can be imposed on a voluntary basis by the airport, or by the Government.
- In conjunction with the above-mentioned noise abatement measures, the introduction of 'passive' mitigation measures, such as noise insulation on existing residential dwellings and noise-sensitive buildings (schools, hospitals, etc.) may be considered.

- 9.7.1. The Noise Unit scrutinised the EMPr, Appendix 43A of the DEIAR, to confirm whether the above recommendations have been weaved into the application and if the recommendations have been responded to with tangible efforts and plans.
- 9.7.2. Under the section 2.2.3 Noise Mitigation, on page 112 of the EMPr, the recommendations from the NIA are listed as “considerations” to minimise noise impacts around CWA.
- 9.7.3. Effective methods to address the noise impacts, as determined and described in the NIA are therefore not yet addressed satisfactory.
- 9.7.4. A Noise Mitigation and Management Plan (NMMP), with measurable goals, which will effectively prevent and intricately manage noise emissions from the airport activity is to be compiled.

9.7.1 Noted

9.7.2 Noted

9.7.3 EAP response: A Noise Mitigation and Management Plan (NMMP), will be compiled prior to the implementation of the proposed Operational Phase. This is stipulated in the EMPr under operational GOAL 10: NOISE MANAGEMENT. The NMMP will become a Condition of Approval in the EA, if granted.

9.7.4. EAP response: A Noise Mitigation and Management Plan (NMMP), will be compiled prior to the implementation of the proposed Operational Phase. This is stipulated in the EMPr under operational GOAL 10: NOISE MANAGEMENT. The NMMP will become a Condition of Approval in the EA, if granted.

		<p>10. Water and Sanitation: Technical Services - Water Demand Management Branch</p> <p>10.1. The overview of the sewer network and bulk services affected and technical requirements to be implemented previously provided by the Water Demand Management Branch remains unchanged. As such, there is no further comment.</p> <p>11. Water and Sanitation: Catchment, Stormwater and River Management (CSRM) Branch</p> <p>11.1. The CSRM Branch received the Concept Stormwater Management Plan (CSWMP): “Concept Stormwater Management Plan, Revision S” dated 12 August 2024, compiled by Zutari outside of the EIA process. The CSRM Branch evaluated the report and the following comments/questions were provided directly to Zutari via email on 25 November 2024:</p> <p>11.1.1. Is this a Concept SWMP or a Master Plan?</p> <p>11.1.2. Elaborate on what the detailed Stormwater Management Plans (SWMP) will include, or will it be one single detailed SWMP? That details this concept plan?</p> <p>11.1.3. Is there a Construction Sequencing Plan in terms of Stormwater and how this relate to the programme of achieving Section 137 Clearances?</p> <p>11.1.4. Are Service Level Agreements to be done with downstream owners? Who are these?</p> <p>11.1.5. Bella Riva Development:</p> <p>11.1.5.1. Has the final SDP been confirmed?</p>	<p>10. Noted</p> <p>11. Response from Zutari:</p> <p>11.1.1 The report submitted is a Concept SWMP with the intention of recommending high-level interventions required to achieve compliance with the CSRM policy. Zutari will at a later stage prepare a Detailed SWMP.</p> <p>11.1.2. The intention is to detail and elaborate on this Concept SWMP and submit a single Detailed SWMP. The Detailed SWMP will include the review and recommendation of mitigation measures for hydrology and hydraulic related effects of the surface water released from the CWA site into the surrounding existing stormwater infrastructure.</p> <p>The Detailed SWMP will also address the comments received from CSRM as part of the Concept SWMP submission.</p> <p>11.1.3. All Stormwater Infrastructure planned for the Cape Winelands Airport development is envisaged to be developed and constructed as part of the first phase of the project to cater for the ultimate scheme.</p> <p>11.1.4. Cape Winelands Airport (CWA) and the Bella Riva developer must enter into a Service Level Agreement w.r.t. the proposed flows being discharged into the Bella Riva Stormwater infrastructure.</p> <p>Further engagement on this SLA will be addressed as part of the Detailed SWMP once the impact of project phasing scenarios and timing are better understood.</p> <p>11.1.5.1. A revised Bella Riva SDP has been received on 5th November 2024 – After we submitted our Concept SWMP to CSRM.</p>
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		<p>11.1.5.2. Will this SDP make provision for the overland flow from the Winelands Airport?</p> <p>11.1.5.3. What storm event will be able to pass through from Cape Winelands?</p> <p>11.1.5.4. The final Bella Riva SWMP must address this and indicate that it is accepted.</p> <p>11.1.5.5. Will the Bella Riva development stormwater mix with the discharge from the airport?</p> <p>11.1.5.6. Is the developer of Bella Riva aware of this?</p> <p>11.1.5.7. Are there any servitudes required and in favour of who will these be?</p> <p>11.1.6. Provide more detail in terms of the overland discharge to Lucullus road, since Urban Mobility does not allow straight discharge onto major road.</p> <p>11.1.7. Based on the Detailed Scoping Phase Freshwater Ecological Assessment compiled by PHS Consulting (Pty) Ltd, Seep Wetland 1 as per Figure 5 in the CSWMP is a no go area, but this has not been highlighted as such in the CSWMP. It seems that the run way has been placed over it?</p> <p>11.1.8. Based on the freshwater ecologist report there are discussions between DWS and the applicant regarding this wetland and what it</p>	<p>An updated Bella Riva Concept SWMP has been submitted to CSRM on 8th December 2024 for comments.</p> <p>11.5.2. Yes, the Bella Riva SDP makes allowance for the accommodation of CWA flows and these flows have been incorporated in the latest revision of the Bella Riva Concept SWMP.</p> <p>11.1.5.3. All storm recurrence intervals will be accommodated below pre-development levels.</p> <p>11.1.5.4. Agreed and noted – The Bella Riva Concept SWMP has been issued to CSRM and addressed this comment.</p> <p>11.1.5.5. Yes, stormwater discharged from the CWA development will discharge into a pond situated along the Eastern boundary of the Bella Riva development. No separate stormwater system has been designed specifically for the CWA stormwater flows.</p> <p>11.1.5.6. Yes, the Bella Riva developer is aware of the stormwater discharge from CWA. The stormwater discharged has been addressed in the updated Bella Riva Concept SWMP has been submitted to CSRM on 8th December 2024 for comments</p> <p>11.1.5.7. Yes, a servitude will be registered for the Lucullus Road extension (Half to be accommodated by Bella Riva and the other half by CWA property).</p> <p>11.1.6. Further detail on overland discharges to surrounding areas to be provided as part of the Detailed SWMP</p> <p>11.1.7. Response from Freshwater Ecologist: The runway will be placed over the seep wetland yes. The anticipated wetland loss is 6.74ha. As a result, an offset investigation was undertaken, and the results thereof is outlined in the wetland offset report. The remainder of the seep wetland 1 and downgradient CVB wetland will be rehabilitated and protected as part of the offset.</p> <p>11.1.8. Response from Freshwater Ecologist:</p>
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		<p>decided by DWS regarding Seep Wetland 1 might have an impact on the stormwater management of this site. What is this impact?</p> <p>11.1.9. This report states that “The overland flow routes on the Cape Winelands Airport site are designed to safely convey the 1:100-year storm event towards the ponds situated along the boundary of the site”, beyond these ponds how will the 1:100 storm be safely conveyed towards the Mosselbank? Please elaborate on each route and how the post development 100-year flow affects these routes. Are there any upgrades required?</p> <p>11.1.10. Has a freshwater ecologist investigated the downstream impact on the tributaries?</p> <p>11.1.11. Confirm that the attenuation volume of the wet pond was calculated as the volume above the wet volume.</p> <p>11.1.12. How will birds be dealt with in this wet pond and does the airport developer support this?</p> <p>11.1.13. Are all the outfall and discharge areas addressed in the DEIAR?</p>	<p>Stormwater management will have an impact on the seep wetland, and this is addressed in the freshwater report. Although 6.74ha of the seep wetland will be lost, by recharging the wetland with treated stormwater from the site, the hydrological functionality of the wetland will be retained. As far as the impact of the wetland on the stormwater management of the site, the loss of the wetland will unlikely impact stormwater management on site – this is addressed by the utilisation of the various stormwater management structures throughout the site.</p> <p>11.1.9. Further detail on overland discharges to surrounding areas to be provided as part of the Detailed SWMP.</p> <p>11.1.10. Response from Freshwater Ecologist: Yes we did, as applicable to the systems within the legislated zones of regulation of the various freshwater ecosystems. Refer to the risk assessment and impact assessment (section 8) of the freshwater report.</p> <p>11.1.11. Correct, I can confirm that the attenuation volume was calculated to be the volume required over and above the wet volume</p> <p>11.1.12. As confirmed the Avian Specialist there are a few key mitigation measures proposed with the most likely option being closure of the wet ponds surface area. Other considerations that we have assessed include the type of vegetation cover and pond water retention times.</p> <p>Response from Afri Avian Environmental: Due to stormwater ponds' brief water retention time (24-48hours), we do not anticipate this posing a significant attractant that would pose a risk for bird strikes. However, it is important to monitor the situation closely, and it should be included in the operational bird and wildlife hazard management program (WHMP).</p>
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		<p>11.1.14. The blackwater treatment plant must be elaborated on within this plan and it must be stated how effluent is utilized and also dealt with in case of emergency (Nothing other than stormwater may be discharged into the stormwater system).</p> <p>11.1.15. External Upgrades in terms of stormwater must be addressed within this plan and also how each fits into the construction sequence.</p> <p>In addition to the questions posed/comments made above, the following comment is provided:</p> <p>11.2. Aspects to be addressed in the detailed Stormwater Management Plan (SWMP):</p> <p>11.2.1. The Master Landscaping Plan (MLP) must be designed and complement the SWMP and vegetation used within the treatment ponds.</p> <p>11.2.2. Ensure that appropriate stormwater vegetation is included into the “proposed plant species legend” (Bio-Retention cell) as stipulated within the City’s “SUSTAINABLE URBAN DRAINAGE SYSTEMS: Landscape and Indigenous Plant Species Guideline, dated 28 February 2011” (Obtainable from the CSR Branch), to facilitate implementation of Sustainable Urban Drainage Systems (SUDS) e.g. Bio-Retention areas.</p> <p>11.2.3. Wetland recharge from stormwater facilities to be elaborated on within the SWMP. To what extent is it required, where it is required, and by what means.</p>	<p>11.1.13. Yes, this is outlined in the detailed Freshwater EIA and wetland offset reports.</p> <p>11.1.14. The blackwater treatment plant is detailed as part of the services report – An emergency storage pond has been designed and allowed for in event of an emergency overflow scenario.</p> <p>11.1.15. External upgrades will be limited to the existing earth drain along the R312 and details provided as part of the Detailed SWMP.</p> <p>Pond 1 currently drains towards Pond 2 to minimise the flows discharge into the R312 existing stormwater earth drain.</p> <p>Only Pond 8 discharges into the existing earth drain in the R312 Lichtenburg Road which is minimal.</p> <p>Flood risk modelling was assessed for each of the delineated watercourses and the simulation produced similar or slightly reduced flood inundations in the post-development scenario.</p> <p>11.2. Noted for inclusion in the detailed SWMP.</p>
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		<p>11.2.4. Elaborate on whether major storm events can be discharged into wetlands from the attenuation infrastructure in a concentrated manner.</p> <p>11.2.5. Wetland sediment trapping measures to be elaborated on (location, functionality and typical details).</p> <p>11.3. In terms of the following Water Use: “(f) discharging waste or water containing waste into a water resource through a pipe, canal, sewer, sea outfall or other conduit – (surplus) treated effluent discharged from the site into the receiving environment when require:</p> <p>11.3.1. Note that as per the City of Cape Town’s Stormwater By-Law: “No person may discharge from any place, or place on any surface, any substance other than stormwater, where that substance can reasonably finds its way into the stormwater system.”</p> <p>11.3.2. Therefore, no treated effluent may be discharged into the stormwater system by any means.</p> <p>11.4. The following must be addressed and included in the EMPr:</p> <p>11.4.1. The City’s Stormwater Policies and By-law must be included within the Environmental Management Programme (EMPr) in the Policy and Legislative Context.</p> <p>11.4.2. Emergency storage to be provided and emergency plan to be compiled for the sewage package treatment plan.</p> <p>11.4.3. Emergency management procedures must be in place and accessible to address any hydrocarbon spillage (during construction phase, operational phase and closure).</p> <p>11.4.4. Heavy vehicle use must address the risk of hydrocarbon spills (during construction phase, operational phase and closure).</p> <p>11.4.5. Early spillage detections systems must form part of the aircraft refuelling facilities.</p> <p>11.4.6. Hazardous substances (hydrocarbons) stored on site during the construction phase, must be stored in a secondary containment area</p>	<p>11.3. Noted for inclusion in the detailed SWMP and Engineering Services Report.</p> <p>EAP response: The proposed water use 21(f) has been removed from the list of water uses as there will be no discharge of treated effluent into the stormwater system.</p> <p>11.4.</p> <p>11.4.1 EAP response: Comment is noted and will be complied with.</p> <p>11.4.2 See response 11.1.14 above.</p> <p>11.4.3. Requirement to be included in EMPr.</p> <p>11.4.4 The emergency storage for sewage had been included in the Bulk Engineering report. The Emergency plan requirement will form part of the Emergency response plan in the EMPr.</p> <p>11.4.5 EAP response: Spill detection and spill containment forms part of the refuelling facilities.</p>
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having an impermeable floor and be of sufficient area/volume to contain 110% of the spill volume stored.

12. Spatial Planning and Environment: Environmental Management Department – Biodiversity Management Branch (BMB)

Appendix 12: Terrestrial Offset Report, dated November 2024, compiled by Conservation Strategy Tactics & Insight

12.1. It is questioned why the Fire Protection Association (FPA) cost is calculated for 100 ha and not for the full 108 ha development footprint which is equivalent to the 108ha proposed for alien clearing? The full amount is to be budgeted.

12.2. The Fund Management Agreement for offset implementation must be made a condition of environmental authorisation and be signed by all parties before construction commences. It is important to note that as this is a reactive Stewardship agreement and all costs must be borne by the applicant. The City of Cape Town will only provide an advisory role if required in this regard.

12.3. The terrestrial offset cost table (Table 4: Proposed management interventions on the priority candidate site, their metrics, costs and frequency on Page 15) is deemed incomplete for realistic, effective management. Clarification on what the endowment will cover must be provided. The terrestrial offset cost table is (potentially) missing some or all of the following, depending on proclamation or conservation servitude status:

- Proclamation costs (SG diagram, advertising, notarisisation),
- Signage,
- Management plan and subsidiary plans,
- Staff,
- Capital costs (vehicles, radios, laptop, etc.),

11.4.6 Requirement to be included in EMPr.

12.

12.1. Response from specialist: Agreed

12.2. Response from specialist: Agreed. Bullet 2 of the proposed EA condition in Section 8 on p16 sets out that the conclusion of an Offset Funding agreement is indeed suggested as a condition, and that it must be concluded prior to commencement

12.3. Response from specialist: Partially agreed to. Some of the amounts were omitted from the management funding calculations as they are once-off/initial establishment and capital costs that will be incurred directly by the Applicant. To address some of the points, additional financial provision has been made for Proclamation costs (SG diagram, advertising, notarisisation), Signage, Management plan development, and minor capital and running costs (although most of the latter were included in the existing budget based on actual CoCT figures provided by them). Additional resources for restoration are now catered for, but there is no option for Security Rangers or Other Staff for the Offset area as it is being leased from the owners, and this is a role they have elected to fulfil.

- Operational running costs,
- Restoration (seed collection, propagation, planting, etc.) and
- Security rangers.

12.4. It is questioned why there is no cost table for management of the on-site conservation area? While these costs may not need to be part of the offset endowment, it must still be budgeted for by the applicant, and audited annually.

12.5. The responsible party to compile the management plan and subsidiary plans for the on-site conservation area and off-site offset must be clarified. Furthermore, it is questioned who will be responsible for

12.4. Response from specialist: The on-site conservation areas (technically set-asides) were required as mitigation by the Botanical Specialist and hence did not form part of the Offset scope. Further, their protection and management would need to be incorporated in the EMPr for the listed activity and site – and this usually is compiled by the EAP and doesn't contain budgetary information. The auditing would be done as part of EMPr and is a key ECO duty. As it is on a separate site, with other implementers/service providers it does not make sense including it in the Offset site financial arrangements. As it is close to/adjacent to the Wetland offset area, it may be possible to incorporate it in that EMPr.

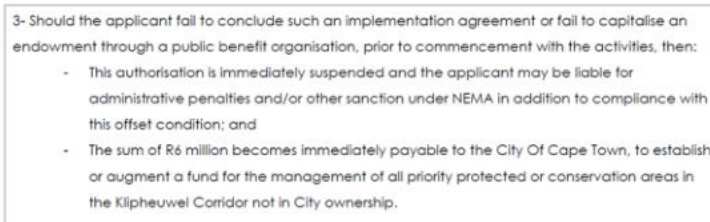
The primary outcome required is that all the remnant vegetation found on the Airport site should be delineated by the botanical specialist, retained in a natural state devoid of physical disturbance, be cleared of invasive vegetation and burnt every 15-20 years. Ideally it could also be under some form of stewardship agreement with the CoCT. However, this is beyond the scope of this offset report.

Response from EAP: The CWA EMD will have a dedicated team for various conservation orientated goals and tasks on the site. The on-site conservation area will be managed by this team and this site is next to the wetland offset and rehabilitation area, the same resources will therefore be used, and the budgets will be merged. Final implementation budgets will be finalised after the EA stands in order to execute the EMPr set goals. The implementation of the EMPr will be a condition in the EA, therefore the outcome of these goals will materialise.

12.5. Response from specialist: Agreed. The EWT will be required to draft the Management Plan in consultation with the CoCT, and auditing response will be a key element of their service agreement with the Applicant.

responding to audits of these plans? As this is a reactive Stewardship site, it will not be the City of Cape Town.

12.6. Both subsections of the terrestrial offset “Condition 3” (see extract in Figure 1 below) are of concern in the absence of clear, detailed explanation, substantiated by the relevant clause(s) in the National Biodiversity Offset Guideline 2023.



3- Should the applicant fail to conclude such an implementation agreement or fail to capitalise an endowment through a public benefit organisation, prior to commencement with the activities, then:

- This authorisation is immediately suspended and the applicant may be liable for administrative penalties and/or other sanction under NEMA in addition to compliance with this offset condition; and
- The sum of R6 million becomes immediately payable to the City Of Cape Town, to establish or augment a fund for the management of all priority protected or conservation areas in the Klipheuwel Corridor not in City ownership.

Figure 1: Extract of page 16 of the Terrestrial Offset Report, dated November 2024

12.7. If Condition 3 is retained, please ensure that the wording adequately legally protects the City of Cape Town, including (but not limited to) addressing the following:

- 12.7.1. Explain how the R6 million penalty for non-compliance was derived?
- 12.7.2. Explain why a penalty would be paid to a third party (Biodiversity Management Branch) rather than to the Competent Authority? The penalties cannot be paid to the City of Cape Town.
- 12.7.3. A clear explanation of what the R6 million may be used for.

Response from CWA: Noted and agreed. The terrestrial off-set requirements have been confirmed as well as the off-site area that will be committed for off-sets. A letter of intent and Heads of Agreement has been signed with the particular land owner to lease the land for a period of 30 years. The Endangered Wildlife Trust (EWT) has been identified as the entity that will manage the off-set area on behalf of the developer. The developer will fund the programme for the 30 year period.

12.6. Response from specialist: It is difficult to address this comment without more detail on what is of concern. The first part sets out a clear regulatory incentive to comply with the offset, while clarifying that the CEA can pursue administrative penalties and other sanctions (e.g. rectification directives) apply, including achieving of the offset outcomes. The second part is an additional financial incentive for compliance that provides resources to a conservation-focused PBO to undertake management actions in priority areas in the City’s Bionet. It is NOT an easy financial offset as was assumed by CapeNature, as the suspended authorisation is substantially costly to rectify and prevents the development from proceeding (and thus causing further loss of biodiversity).

12.7. Response from specialist:

- 12.7.1. This is the calculated Net Present Value of the management costs for the offset areas for the 30-yr duration.
- 12.7.2. Accepted. This is amended to be payable to an engaged PBO, the EWT.
- 12.7.3. Recall that this amount is best viewed as an additional direct financial penalty to encourage compliance with the offset. It must be spent on the management of the priority conservation areas in the City’s Bionet in the Klipheuwel Corridor that are not in City ownership. As it is not clear what the most immediate or

12.7.4. In the event of the authorisation holder failing to deliver on the agreed offset, the Competent Authority, Department of Environmental Affairs and Development Planning (DEA&DP) should determine the process.

DEIAR

12.8. The following botanist's mitigation measures on Page 472 refer: "The applicant, or their appointed management authority, must provide all necessary funding for all required ecological management of the site (airport site and conservation areas in Agricultural Precinct), and for the chosen and agreed biodiversity offset, in perpetuity."

pressing needs are, or will be if this sanction is ever invoked, it is left up to the discretion of the PBO what to spend the funds on. A section has been added to require the concurrence of the DEA&DP and CoCT. See below.

12.7.4. Agreed. That is what the first part of the proposed condition 3 is for. The second part is deliberately an additional financial incentive to not avoid compliance with the offset, and allows any I&AP an opportunity to seek appropriate relief if the offset doesn't materialise.

Suggested new Condition 3: Should the applicant fail to conclude such an implementation agreement or fail to capitalise an endowment through a public benefit organisation, prior to commencement with the activities, then:

- This authorisation is immediately suspended, and the applicant may be liable for administrative penalties and/or other sanction under NEMA in addition to compliance with this offset condition; and
- The sum of R6 million becomes immediately payable to the Endangered Wildlife Trust, to establish a, or augment an existing, fund for the management of all priority protected or conservation areas in the Klipheuwel Corridor not currently in City ownership. The priorities for the funds must be determined in consultation with the DEA&DP and CoCT Biodiversity Management Branch.

12.8

12.8.1. The wording in the Botanical IA has been amended to make the applicant liable for costs.

		<p>12.8.1. This wording must be amended/clarified. The appointed management authority (third party) cannot be held liable to provide all funding for on-site and off-site conservation. This goes against the NEMA Polluter Pays principle and National Biodiversity Offset Guideline 2023 if the applicant (Environmental Authorisation holder) does not provide the funds.</p> <p>12.9. The following statement on Page 476 refer: “The condition of all Very High, High and Medium sensitivity areas (Agricultural Precinct and on site) should be monitored every year by a suitably competent botanist (or CoCT Environmental Management Dept.), and they should make recommendations for any management changes or actions (alien clearing, lack of fire, etc.) that are needed in order to achieve optimal ecological functioning in these areas.”</p> <p>12.9.1. As this is a reactive Stewardship case, the developer must fund all the associated costs including the annual audits, which will not be done by the City of Cape Town: Biodiversity Management Branch (BMB). The BMB can offer advice and comment on the annual audits if required.</p> <p>12.10. The Freshwater monitoring section on Page 508 does not identify who will be responsible for this monitoring. The responsible person/entity must be clarified.</p> <p>12.11. It is to be recorded that the agricultural precinct (see Figure 2) was never part of any offset discussions. As such, any loss of wetland or terrestrial habitat here (which are significant) would be subject to a completely new discussion. The Very High sensitivity patch in the north eastern corner of the agricultural precinct is to be deemed a No-Go area as this is directly in the ecological corridor with numerous plant populations that are irreplaceable. It is acknowledged that the “No-go” area requirement is included in the EMPr.</p>	<p>12.9 Noted</p> <p>12.9.1 The Botanical IA has been amended. Monitoring and auditing will be by suitably competent botanist at the cost of the applicant with input from CoCT Env dept as required.</p> <p>12.10 EAP response: The Freshwater Offset report (Appendix 8) includes responsibilities and responsible party for monitoring and other management actions.</p> <p>12.11 EAP response: The Agricultural Precinct entails existing farming areas, access roads, areas of freshwater offset, areas of botanical conservation, stormwater structures and fencing.</p>
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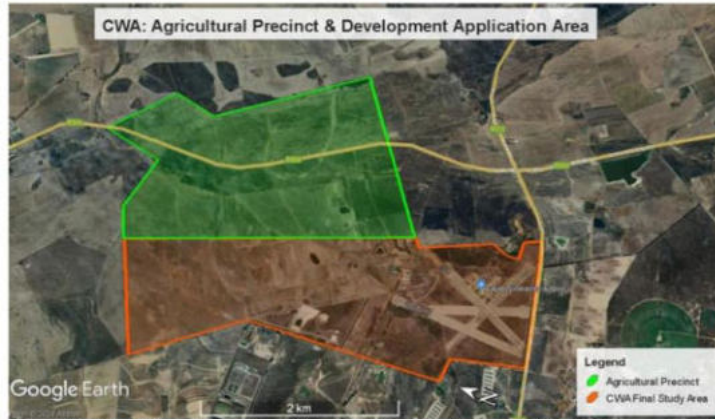


Figure 2: Extract of page 2 of the Botanical Assessment Report reflecting the proposed agricultural precinct and CWA development area

13. Spatial Planning and Environment: Environmental Management Department – Environmental and Heritage Management Branch (EHM)

DEIAR

13.1. A 15m conservation buffer has been implemented for the wetlands to be conserved on site; however it is questioned why no buffers are proposed for the Very High, High and Medium sensitivity areas being conserved within the Agricultural Precinct and on site from the development. The buffers will ensure reduced edge effects onto the sensitivity areas and optimal ecological functioning.

13.2. No Operational Environmental Management Plan/Programme was included in the DEIAR documentation. Kindly confirm if one will still be compiled, and when?

13.3. It is acknowledged that proactive engagement with bird organisation (e.g. Birdlife South Africa) was not identified during the scoping phase, neither was their inclusion as an Interested and Affected Party required as part of the Proposed Plan of Study. It is cautioned that failure to engage with such avifaunal entities might raise questions as to whether the potential

13.

13.1. Response from FEN: Considering that no new development or changes to the farming practices within the Agricultural Precinct are proposed, no additional impacts on the freshwater ecosystems within the Agricultural Precinct are anticipated and therefore no conservation buffer was applied to the freshwater ecosystems. An ecological buffer has however been applied to the offset site, which is located within the Agricultural Precinct, as per the offset report.

13.2. Operational aspects are included in the EMPr in Appendix 43A, and complies with Section 24N of NEMA.

13.3. Eap response: Birdlife South Africa has been included as an IAP.

impact of avifauna by the proposed expansion has sufficiently been reviewed.

Appendix 8: Wetland Offset Study and Implementation Plan, dated September 2024, compiled by FEN Consulting

13.4. The rehabilitation objectives and measures highlighted in the report are concurred with. The alien invasive removal should also include the removal of water-related invasive species in the event these species are detected within the waterbodies.

Appendix 37: Bird Strike Risk Assessment, dated September 2024, as compiled by AfriAvian Environmental

13.5. The Bird Strike Risk Assessment does not highlight or provide mitigation measures for the potential collisions with solar panels of the proposed photovoltaic facility (i.e. the lake effect).

13.6. The Bird Strike Assessment highlights that effective management is required to mitigate the attractiveness of the site to birds. However, it does not provide measures in order to achieve this.

13.6.1. The use of trained dogs to deter birds from the runways and movement areas to reduce the risk of bird strikes as used at OR Tambo International Airport¹ are to be investigated.

13.6.2. The use of bird radars to monitor bird activity as used at King Shaka International Airport² is also to be investigated.

Appendix 43A: Environmental Management Programme (EMPr) Main report

13.4. Response from FEN: The comment on the removal of water related invasive plant species is noted and will be incorporated into the offset report.

13.5. Response from Afri Avian Environmental: The PV facility did not form part of the scope of work of AfriAvian Environmental.in

Response from SAS: It has been documented that solar PV arrays may create a “lake effect”, leading to a potential increase in avifaunal collisions with panels, notably at night for waterbirds. However, it is important to note that the solar panels at the Cape Winelands Airport will be mounted to the roof structures of the airport buildings. The height disparity from ground level and structures of the buildings themselves will minimise the effect of a waterbody being created. Regarding night flying avifauna, the airport will be well lit (for health and safety), so the risk that avifauna flying overhead mistake the solar panels as a waterbody will be further reduced. Furthermore, the high activity associated with the airport will possibly lead to species diverting around the airport instead, thereby further decreasing the risk of avifaunal collisions with the solar panels.

13.6. Response from Afri Avian Environmental: The requirement is that a wildlife hazard management plan (WHMP) should be developed in collaboration with the operator. It should be designed in accordance with the requirements of the SACAA and also be compliant with international best practise in order to effectively address risks and include an adaptive management element. The WHMP should be reviewed annually.

		<p>13.7. There are abbreviations within the EMPr document, which are not included in the abbreviations list e.g. RoW and RAM. It is to be ensured all abbreviations are included in the list.</p> <p>13.8. The EHM Branch support the proposed the establishment of the CWA Environmental Management Division for the project as elaborated under Section 3.3 on page 159 of the EMPr. This entity should continue throughout the construction phase and into the operational phase of the CWA, as environmental impacts will not cease once the expansion project concludes.</p> <p>13.9. The ECO monthly reports during the construction phase and audit reports compiled (pages 281 and 283 respectively) are to be circulated to the City of Cape Town’s Environmental and Heritage Management Branch – Northern Region for record purposes.</p> <p>13.10. The main report on pages 115 and 116 refers to the compilation of a plant Search and Rescue plan for the large-scale search and rescue operation of plant material from all Medium, High and Very High sensitivity areas within the development and clearing footprints. This plan must be compiled as part of this EIA process and be included in the EMPr. Another important aspect not highlighted is the recording of flowering and seeding times of species to be search and rescued, as this is imperative information required for the operation to be a success. How these will be appropriately marked for identification must also be included in the plan.</p> <p><u>Appendix 43B: Environmental Management Programme (EMPr) Annexures</u></p> <p>13.11. The Annexures list indicates an Annexure 17: Permits and Licence however no such Annexure has been included in the document.</p> <p>13.12. As indicated in Point 14.4 above, the plant Search and Rescue plan for the large scale search and rescue operation of plant material must be included as part of this compilation of annexures.</p> <p>13.13. The following is stated in the EMPr on page 200 refers: “The Agricultural Precinct must be considered a “No-Go” area with no further</p>	<p>13.7. The request will be complied with.</p> <p>13.8. Noted</p> <p>13.9. Noted</p> <p>13.10. Noted</p> <p>13.11. Annexure 17 will be the permits and licences obtained in future that are associated with the proposed project and to be audited with the EMPr in future.</p> <p>13.12. EAP response: The Plant Search and Rescue Plan forms part of the EMPr and is included under Section 4.2.1. F. Protection of sensitive features (Search & Rescue).</p>
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		<p>development/ construction activities to be allowed within the Agricultural Precinct". It is questioned if this agricultural precinct area is a suitable receptor site for the search and rescued plants to provide in situ conversation?</p> <p>13.14. The Draft Veldfire Management Plan highlights the importance of ecological burns and the need for the compilation of a Standard Operating Procedure to ensure effective coordination between aviation operations and airport management teams. Due to the lack of fire history on the site, the first ecological prescribed burn should take place prior to the commencement of the proposed expansion (Note: In the event of this proposed project being authorised).</p> <p>13.15. The Draft Alien Vegetation Management Plan must include that all alien clearing operations must not be conducted in windy conditions.</p> <p>13.16. The following is to be added under Section 4.5 on page 37 of the Draft Alien Vegetation Management Plan: "When the larger plants are cut, branches should be cut into small enough pieces that they can be carried and not dragged. This minimizes the disturbance and spread of any seed that may be present on the plants".</p> <p>13.17. The Wildlife Management Plan does not provide guidance as to the procedure for when bird strikes occur i.e. how the injured or deceased animal is handled, taken care of, disposed of (if deceased) and recorded.</p> <p><u>Heritage</u></p> <p>13.18. The previous comments provided remains valid. The EHM Branch will await the outcome of the decision on the Section 38 Heritage Impact</p>	<p>13.13. Suitable sites to be assessed once the compilation of the plant Search and Rescue plan commences.</p> <p>13.14. Noted</p> <p>13.15. Noted</p> <p>13.16. Noted</p> <p>13.17. The Bird and Wildlife Hazard Management Plan is to be a requirement for authorisation and is still to be developed.</p> <p>Response from Afri Avian Environmental: The comment regarding the wildlife hazard management plan not providing the required mitigations from the avifaunal specialist is premature. It is important to clarify that the wildlife hazard management plan is not relevant, nor part of the EIA (Environmental Impact Assessment) process. This plan will be developed in collaboration with the operator by an appropriately skilled specialist. It should be designed to address risks and include an adaptive element, depending on the number of staff employed and the habitat on the site.</p> <p>13.18. Noted</p>
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		<p>Assessment submitted to Heritage Western Cape (HWC) and will provide further input once the HWC heritage submission process has been concluded.</p> <p><u>Signage</u></p> <p>13.19. The Outdoor Advertising Guideline (Appendix 32) takes cognisance of the new Outdoor Advertising Bylaw, 2023. The requirement for a Signage Master Plan remains the applicable and is included in the said guideline.</p> <p>The above City of Cape Town comment must be addressed and included in the second Draft Environmental Impact Assessment Report. The circulation of the second Draft Environmental Impact Assessment Report is awaited to ensure that the City of Cape Town’s comments are sufficiently addressed.</p>	13.19. Noted
328	Danielle - Mosselbank River Conservation Team	<p>Email dated 13 December 2024:</p> <ol style="list-style-type: none"> 1. Kindly see attached letter for your attention. 	<p>Email response provided 13 December 2024:</p> <ol style="list-style-type: none"> 1. Thank you for the email and comments attached.
		<p>Letter received via email dated 13 December 2024:</p> <p>LETTER OF OBJECTION TO THE PROPOSED EXPANSION OF CAPE WINELANDS AIRPORT - DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT</p> <ol style="list-style-type: none"> 1. COMMENT PERIOD <p>We acknowledge the legal requirements for a public comment period; however, expecting stakeholders to review and provide feedback on a 640-page Draft Environmental Impact Assessment and approximately 46 supporting reports within a single month is highly impractical. This timeline raises concerns about the applicant's intent to expedite the process. Additionally, the comment period coincides with the end of the year, a time when industries typically shut down, leaving Interested and Affected</p>	<ol style="list-style-type: none"> 1. The Comment is noted. The draft EIAR is 712 pages with 47 Annexures.

Parties with limited capacity to engage third parties for assistance in reviewing the documents.

2. ACCESS TO INFORMATION

There is only a single hard copy of the documents available for I&APs to review at the Fisantekraal library. This raises significant concerns about accessibility, particularly given the limited hours during which the library is open. How are I&APs, especially those who work full-time, expected to thoroughly review these documents when they are left with only a few hours on Saturdays? Additionally, the availability of these reports was not clearly communicated; had we not specifically inquired with the library staff, we would not have known they were available. Clear and prominent notifications regarding the accessibility of these documents are essential. Many of the residents do not have access to internet or printing facilities, further limiting access to information. Moreover, the surrounding community predominantly speaks Afrikaans and Xhosa. At a minimum, the summary document of the EIA should be made available in these languages to ensure broader understanding and meaningful participation, rather than limiting translation efforts to notifications alone.

3. TECHNICALITY OF REPORTS

As someone with a little science background, I found these reports challenging to comprehend, as they appear to be written in a manner that may 'confuse' readers. It is highly unlikely that someone without a scientific background would be able to fully grasp the potential impacts of this project due to the technical nature of the content. It is imperative that an information session is organized to address the concerns and risks raised in the Draft EIA. Such a session should not be scheduled during typical working hours, as was the case with the session held on 20 November 2024. Instead, it should be accessible to the broader public and designed to clearly outline the project's impacts in a way that is easily understandable for individuals from all backgrounds. Specific focus should be given to areas of concern, such as noise, air quality, increased traffic, and potential effects on crime levels.

4. AIR QUALITY IMPACT ASSESSMENT Table 4-9 – Emissions of current runways at capacity and table 4-11 Emissions of new runway at full

2. There is a hard copy of the draft EIAR and supporting documents available at the Fisantekraal library. The documents are also available online on the PHS Consulting website. The hard copy and the notice above it were placed where indicated by the library, which is the only space available to place it. It is the same space that the two previous hard copies were placed during the pre-application and in-process scoping phase. The provision of the summary in Afrikaans and isiXhosa will be considered for the next round of PPP.

3. An open day was held on 20 November 2024 at Goedgeleven Venue in order for IAPs to interact freely with the technical and specialist team. The open day extended from 2pm to 8pm to allow people that work to attend after work.

4. Response from specialist:

capacity has exactly the same figures? This surely must be an error as bigger and more frequent airplanes will increase air emissions?

Table 4-9. Emissions of Current Runways at Capacity (Scenario 1: No-Go Alternative)

Category	Emissions (tonne/yr)							
	CO ₂	CO	THC	VOC	NOx	SOx	PM ₁₀	PM _{2.5}
Aircraft	37,518	85.1	13.3	15.1	249.4	69.7	3.2	3.2
GSE	-	128.5	-	4.4	13.9	0.4	0.5	0.5
APUs	-	9.8	0.7	0.8	7.1	1.1	1.2	1.2
Parking Facilities	-	3.9	-	0.5	0.3	0.002	0.009	0.005
Roadways (airport)	-	19.4	-	0.9	0.84	0.04	0.16	0.08
Stationary Sources	-	-	0.6	0.7	-	-	-	-
Sub-Total	37,518	246.8	14.6	22.3	271.6	71.2	5.0	4.9
Roadways (general)	-	279.4	-	8.4	8.7	0.3	2.0	0.9
Grand Total	37,518	526	15	31	280	71	7	6

Table 4-11. Emissions of New Runway at Full Capacity (Scenario 3)

Category	Emissions (tonne/yr)							
	CO ₂	CO	THC	VOC	NOx	SOx	PM ₁₀	PM _{2.5}
Aircraft	37,518	85.1	13.3	15.1	249.4	69.7	3.2	3.2
GSE	-	128.5	0.0	4.4	13.9	0.4	0.5	0.5
APUs	-	9.8	0.7	0.8	7.1	1.1	1.2	1.2
Parking Facilities	-	3.9	-	0.5	0.3	0.002	0.009	0.005
Roadways (airport)	-	19.4	-	0.9	0.84	0.04	0.16	0.08
Stationary Sources	-	-	0.6	0.7	-	-	-	-
Sub-Total	37,518	246.8	14.6	22.3	271.6	71.2	5.0	4.9
Roadways (general)	-	279.4	-	8.4	8.7	0.3	2.0	0.9
Grand Total	37,518	526	15	31	280	71	7	6

Dispersion Simulation Results

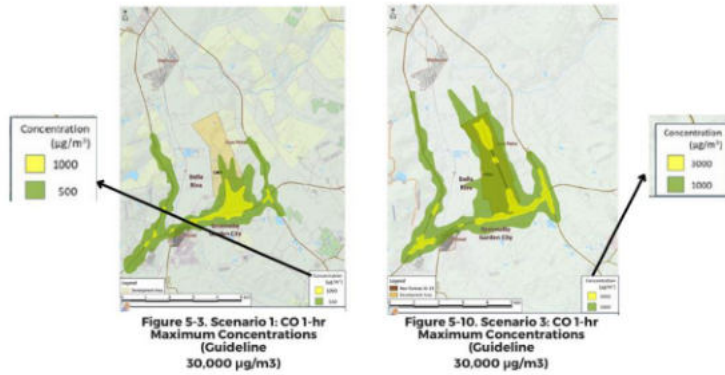
The figures provided in the dispersion simulation show different concentration scales between the two scenarios and lead to a misleading depiction of concentrations for when the airport is fully functioning. If there is a specific methodology or rationale behind this discrepancy, please provide an explanation. For example, if yellow indicates 1000 µg/m³ per hour in scenario 1, how can yellow be 3000 µg/m³ in scenario 3? It should indicate a new level of concentration with another colour perhaps? At first glance, a reader would think the impact is minimal, but then you see the yellow actually depicts higher concentration values. This is the case for all the air emission types.

This table is a typographic error, and it was updated the same day that the report was issued. The table is corrected to indicate the Scenario 3 emissions, which are higher than Scenario 1.

Both Figures 5-3 and 5-10 pertain to distinct operational conditions but adhere to the same standard for pollutant concentration guidelines, including the 1-hour carbon monoxide (CO) threshold of 30,000 µg/m³.

The colour at each figure should be seen in accordance with the level that it indicated to represent. It is clear that the extent of the impacts for Scenario 3 are greater than Scenario 1.

The report explicitly demonstrates that 1-hour maximum CO concentrations remain well below the guideline limit under all operational scenarios, reinforcing compliance with South African Ambient Air Quality Standards (NAAQS).



Just to be clear, the applicant does not foresee cargo, taxi's, passengers to drive through Greenville via Lucullus Road from the N1 to get to the Airport, or past the Fisantekraal Taxi Rank (Route example below)? If it is predicted, then should these areas not be included in the air emission study?



Please provide a combined map of each air pollutant illustrating the current and projected air emissions. This will offer a clearer visual representation of the affected area.

This type of representations are not routinely included in such studies, since the meteorological conditions and emission source characteristics play an important role in the dispersion of the pollutants and the resulting

Mitigation measures

The report states that the significance of the impact is classified as LOW without mitigation, citing that "even though the maximum 1-hour NO₂ concentrations exceeded the 1-hour standard, the frequency of exceedances was below 10 per year." However, what safeguards are in place should the applicant decide to alter operations, such as increasing the number of flights, resulting in changes to the concentration levels? Are residents expected to accept higher NO₂ levels that could adversely affect human health and the surrounding agricultural community?

The specialist must include a dedicated section in the report addressing the potential long-term impacts of these pollutants on future residents in the area and livestock farmers. This analysis is crucial for understanding the broader and sustained consequences of exposure to these pollutants, especially NO₂:

- NO₂ irritates the lungs, causing inflammation of the airways.
- Prolonged or high-level exposure can reduce lung function and increase the risk of respiratory infections such as bronchitis and pneumonia.
- Children, the elderly, and individuals with pre-existing respiratory issues are more susceptible.
- Livestock exposed to high levels of NO₂ and associated pollutants may experience respiratory issues, reduced weight gain, and decreased reproduction rates.
- NO₂ contributes to nitrogen deposition in soil, altering its pH and nutrient balance.
- Acid rain can harm aquatic ecosystems and contaminate water sources used for irrigation and livestock, affecting both plant and animal health.

concentrations. The ground-level concentrations are included in the report, as per dispersion modelling regulations.

The Air Quality Impact Assessment (AQIA) comprehensively evaluates direct and cumulative emissions, including pollutants such as NO_x, SO_x, CO, and VOCs, using detailed dispersion modelling aligned with South African Ambient Air Quality Standards (NAAQS). The NAAQS serve to indicate what levels of exposure to pollution are generally safe for most people, including vulnerable groups, over their entire lifetimes.

The AQIAR explicitly assesses air quality impacts on sensitive receptors, including existing and future residential areas, using robust modelling tools aligned with the National Environmental Management Act (NEMA). The evaluation considers both direct and cumulative impacts, addressing pollutant dispersion and proposing mitigation measures to manage emissions.

Apart from human health impacts, high NO_x concentrations also have adverse impacts on the growth of vegetation and agricultural crops. According to the WHO, the long-term critical level for NO_x is set to 30 µg/m³, expressed as NO₂. Based on this level and from the annual concentration contours it is evident that the impacts on vegetation and on animals are very low and limited only within the airport site.

- Frequent exposure to NO₂ pollution can lead to higher rates of illness, increasing medical expenses and reducing productivity

5. NOISE STUDY

The noise study concludes that, with mitigation, the noise nuisance is classified as MEDIUM. However, the proposed mitigation measures require implementation by the affected receptors, such as residents and developers, in the form of “noise insulation on existing residential dwellings.” This recommendation is wholly impractical and unreasonable, particularly for residents in a marginalized, low-income community.

Additionally, Figure 4.3 reveals that the number of events exceeding 70 dBA is over 50 per day across a significant portion of the Greenville City residential area. Does this imply that future residents of Greenville will be subjected to more than 50 disruptive noise events daily? If so, this raises serious concerns about the liveability and well-being of the community in this area. These issues must be addressed with realistic, equitable, and community-focused mitigation measures.

Constant noise nuisance from airports can have significant psychological impacts on humans, affecting mental well-being and quality of life and this impact has to be investigated.

- Chronic exposure to noise, especially unpredictable or high-decibel events like aircraft takeoffs and landings, activates the body's stress response. Prolonged exposure can lead to elevated cortisol levels, contributing to long-term stress and associated health risks.
- For children, airport noise has been linked to difficulties in concentration, memory, and learning. For adults, it can impair focus, decision-making, and overall productivity, particularly in noise-sensitive tasks.
- Noise can make outdoor spaces or certain activities less enjoyable, leading people to withdraw from community

5. Response from specialist:

The Noise Impact Assessment conducted as part of the EIA follows recognized methodologies and standards to evaluate potential noise impacts comprehensively. Mitigation measures have been proposed based on these findings, and additional adjustments can be explored in collaboration with stakeholders if specific concerns are substantiated.

The proposed airport extension will not significantly impact on the existing rights or land uses held by Garden Cities, subject to the implementation of the recommended mitigation measures. As acknowledged above, the rezoning of Greenville Erf 4 has lapsed, and its existing rights and use is that of Agriculture.

Existing developments and landholdings with rights are not impacted. The assertion that a large area of the Greenville Garden City development will be exposed to average noise levels above the district rating level without effective mitigation measures overlooks the comprehensive strategies outlined in the Noise Impact Assessment (NIA). These strategies include optimizing aircraft operations, implementing noise barriers and incorporating acoustic insulation for affected buildings. Additionally, land-use planning is being aligned with noise contour mapping to ensure compatibility with anticipated noise levels. While localized impacts are acknowledged, the claim of "large area" exposure lacks quantification, as the noise modelling demonstrates that zones exceeding district levels are specific and localized. The project is committed to ongoing monitoring and iterative mitigation, leveraging new technologies and operational efficiencies to manage noise impacts effectively over time. These efforts are being undertaken in compliance with SANS 10103 and international standards.

Figure 4-14 of the NIA indicates areas within Greenville Garden City experiencing more than 50 N70 events daily, this however, is balanced against

engagement or social interactions. Over time, this may contribute to feelings of isolation.

- Persistent noise can interfere with daily activities such as enjoying quiet moments, engaging in conversations, or working effectively, leading to a reduced sense of overall well-being.

6. SAFETY AND SECURITY

The applicant appears to underestimate the potential impact of the proposed airport on local crime levels. This concern was evident during the presentation by the airport's head of security at the Durbanville Community Policing Forum, where it became clear that the cumulative impacts of the project are not fully understood or that critical stakeholders, such as the registered Fisantekraal Neighborhood Watch, are not being effectively engaged. The Neighborhood Watch plays a pivotal role in stakeholder engagement and community safety.

While the applicant may plan for comprehensive security measures within the project area, what assurances are in place for the safety of employees, residents, and passengers outside the airport's boundaries? It is reasonable to expect that the applicant would be deeply concerned about potential incidents, such as hijackings or robberies targeting passengers

several mitigating factors. These include the operational design of the proposed airport, prevailing wind conditions, and take-off patterns that ensure aircraft are climbing and moving away from residential areas. The initial climb phase, where engine operations are at higher levels, occurs more than 5 kilometres away from Greenville Garden City, substantially mitigating the intensity of noise exposure at ground level.

Moreover, the NIA emphasizes that noise contour mapping and event frequency are not isolated indicators of severe impact. They are part of a comprehensive analysis that includes the duration of exposure, the effectiveness of noise insulation, and community-specific factors.

Even though the N70 events are indicative of potential noise impacts, the broader context provided by the NIA demonstrates that these impacts are managed through operational measures and strategic planning. Additionally, noise mitigation strategies such as sound insulation, operational restrictions during sensitive hours, and community engagement programs are part of the ongoing process to address and minimize these impacts effectively.

6. Response from CWA: Ongoing discussions are being held with Garden Cities as to the impact of noise on the yet to be constructed component of the Greenville Housing development directly south of the airport. With the noise cones now having been confirmed following the release of the noise specialist report there is greater clarity as to the potential impact.

As much as the Greenville development have been planned for some time now the current information suggests that the development rights have subsequently lapsed after not being taken up for 10 years. The provision of housing is an important part of creating integrated solutions where people can live, work, play and learn, the Cape Winelands Airport are therefore committed to working closely with the Garden Cities team to ensure that is achieved.

In the absence of current rights the implication is a need for some limited revised planning as only a portion of the Greenville development is impacted upon. The Cape Winelands Airport team have provided Garden Cities with an up-front and principle commitment to buy and take over any land initially

traveling to and from the airport, as these would significantly harm public perceptions of safety around the facility.

Example from CTIA: HIGH-RISK AREAS NEAR AIRPORT

The following areas are considered high-risk:

- N2 off-ramp onto Borchers Quarry Road.
- N2 off-ramp onto R300 on both the Bellville and Mitchells Plain sides.
- N2 off-ramp onto Airport Approach Road.
- N2 off-ramp to Oliver Tambo Drive.
- N2 between Mew Way.

Furthermore, the risk of increased drug activity in the local communities, an issue already highlighted in crime statistics, must be explicitly addressed. The applicant’s plans should include proactive measures to mitigate this risk and safeguard the surrounding community

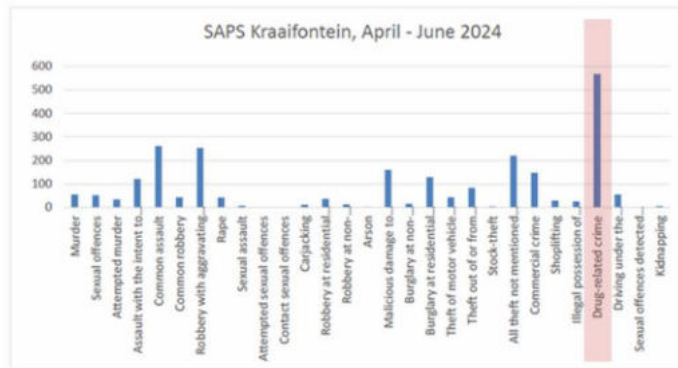


Figure 17: Crime statistics recorded at SAPS Kraaifontein, April-June 2024. Source: SAPS, 2024

To address these concerns, the applicant must develop and implement a detailed safety plan that outlines measures to protect all stakeholders associated with the project. It is also important to acknowledge that the Kraaifontein and Durbanville SAPS are already stretched thin due to limited manpower and resources. Introducing an airport without adequate crime prevention strategies risks exacerbating these challenges, potentially introducing an unintended criminal element.

Given the magnitude and extensive scope of this Draft EIA, we are unable to provide comprehensive comments on all elements of the EIA within the limited commenting period provided

earmarked for residential that are impacted upon. This land will be suitable for alternative land use less sensitive to noise i.e. commercial and light industrial.

Important to keep in mind that the airport’s existence, i.e. 80 years, pre-dates all surrounding developments, existing and planned.

Following the specialist reports it is clear that expansion of the airport will not infringe upon current and existing rights of neighbouring developments. The different developments cannot only co-exist with proper planning, it will also be the responsible thing to do so.

Response from CWA:

CWA’s security interventions are intended to strengthen the safety and security of the airport and surrounding communities. An integrated approach will be adopted working with and collaborating with various security agencies and the communities. Different roleplayers form part of the security value chain and there is a shared responsibility among multiple security entities to collectively address risks and mitigate threats.

Understanding the current and future security risks and threats forms an important requirement in the security plan. The plan aims to enhance security and also address security gaps in the immediate region.

329	Arabel McClelland – DEADP Directorate: Pollution and Chemicals Management	<p>Email dated 13 December 2024:</p> <ol style="list-style-type: none"> 1. Please find attached comment from the Directorate: Pollution and Chemicals Management on the above application. Should you have any queries, please do not hesitate to contact us. 	<p>Email response provided 13 December 2024:</p> <ol style="list-style-type: none"> 1. Thank you for the comments provided
		<p>Letter received via email dated 13 December 2024:</p> <p>COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT REPORT AND WATER USE LICENCE FOR THE PROPOSED EXPANSION OF THE CAPE WINELANDS AIRPORT ON PORTION 10 AND 23 OF FARM 724, PORTION 7 OF FARM 942, RE OF FARM 474 AND PORTION 3 AND 4 OF FARM 474, FISANTEKRAAL</p> <p>The Directorate: Pollution and Chemicals Management (D: PCM) acknowledges receipt of the Draft Environmental Impact Assessment Report (DEIR) and Water Use Licence Application (WULA) on 13 November 2024. Please find combined comment on the DEIR and WULA from the D: PCM as follows:</p> <p><u>Draft Environmental Impact Assessment Report</u></p> <ol style="list-style-type: none"> 1. For the treatment and management of sewage from the proposed development, the D: PCM supports Option 2, construction of an on-site sewage treatment plant. This option will alleviate the pressure on the nearby conventional municipal treatment plant (Fisantekraal) and ensure the future sustainability of wastewater management, which will be crucial for overall water resilience in the province. 2. It is intended that “An internal network will collect sewage from the various buildings within the western precinct and convey it to a package treatment plant. The wastewater treatment plant will treat to a quality that meets the applicable limits. The treated effluent will then be stored and reused on the site as non-potable water supply”. The D: PCM recommends that frequent water quality monitoring of the treated effluent intended for re-use be undertaken, to ensure that human well-being is not impacted by the reuse of poor-quality effluent. 3. The D: PCM supports the impact mitigation measures, listed in table 57 of the DEIR (pg 387 - 392), for the prevention of contamination of 	<ol style="list-style-type: none"> 1. The comment is noted. 2. The comment is noted and will be included in the EMPr. 3. Noted

groundwater resources from leaks from fuel storage and distribution services. Water Use Licence Application

4. It is noted from the Geohydrological Assessment (Appendix A) that surrounding groundwater users use groundwater primarily for agricultural purposes. To prevent severe impacts on these users, the management of onsite groundwater abstraction is crucial and therefore the D: PCM supports the mitigation measures outlined in the proposed groundwater monitoring plan for production boreholes.
5. It is noted that two production boreholes have been drilled on-site to supply groundwater for the initial phases of the proposed development. From page 185 of the WULA technical report it is said that "The combined conservative estimate of groundwater available from both boreholes is 110,376 m³ per annum. An application under Section 21(a) of the NWA is being submitted to abstract the maximum sustainable yield from the two existing production boreholes. However, the anticipated groundwater demand for the long-term operation of the airport is projected at 256,703m³ per annum. By 2038, during Phase PAL 2, additional groundwater will be required to meet this demand. This will necessitate the drilling of additional boreholes, capable of providing an estimated 146,327m³ per annum (or 4.7L/s). The Aquifer Firm Yield Model has confirmed that the Groundwater Resource Unit (GRU) in the region has the capacity to support the additional water extraction required for future phases of development. An additional borehole CWA_BH003 is in the process of being developed". It is noted that the current volume of groundwater abstracted within the GRU, with registered WARMS boreholes, is 1 424 387m³/a, which is sufficient to sustain the future long-term groundwater needs of the proposed development. However, future groundwater use within the GRU may be impacted by additional new groundwater users (due to economic spin offs from the CWA) which is not accounted for in the current model calculations. It is recommended that caution is used when assessing future groundwater use within the GRU and that regular reviews of the groundwater models be carried out to ensure that sustainable groundwater practices are maintained.

4. Noted

5. Noted. The application for abstraction of groundwater forms part of the WULA and is subject to the determination of sustainable yields per borehole and monitoring requirements to prevent over abstraction.

		<p>6. Please direct any enquiries to Gunther Frantz should you require clarity on the comments provided.</p> <p>The Department reserves the right to revise or withdraw comments or request further information based on any information received.</p>	<p>6. Noted</p>
330	Karla Burger – ELCO Property Development	<p>Email dated 13 December 2024:</p> <p>1. The below has reference.</p> <p>Please see attached the following for your perusal:</p> <ul style="list-style-type: none"> • Comments Letter • Power of Attorney • Resolution <p>Kindly acknowledge that this has been received.</p> <p>Please note the comments letter is outlined below while the remaining documents provided are attached as Appendix D (C330).</p>	<p>NOTE STATUS OF ENGAGEMENT: Regular and ongoing engagements underway, progressed to a point where working sessions have taken place between the two professional teams, Bella Riva and CWA. The main objective of these sessions have been/are to achieve alignment between the two planned and intended developments. Significant progress has been made to date, particularly as it pertains to road access and integration of the two developments. A further principle commitment has been made by CWA to purchase any land on the Bella Riva development affected by noise, subject to reaching commercial terms and Board approval. Having reached consensus on the required position of the road linkages has also ensured that the airport staff, users and passengers will be able to access the adjacent rail line.</p> <p>Email response provided 14 December 2024:</p> <p>1. Thank you for the email. Your concerns will be recorded and responses provided in the Comments and Responses report to be circulated for comment early 2025. You will also be registered as an IAP for the proposed project if you are not already registered.</p>
		<p>Letter received via email dated 13 December 2024:</p>	

COMMENT ON IN-PROCESS EIA REPORT: PROPOSED EXPANSION OF THE CAPE WINELANDS AIRPORT ON PORTION 10 AND 23 OF FARM 724, PORTION 7 OF FARM 942, REMAINDER, PORTION 3 AND 4 OF FARM 474 (16/3/3/2/A5/20/2046/24)

We hereby provide our comment on behalf of our client to the above mentioned proposal.

Please note the following comments and engagements for the record:

- Formal Comment submitted 8 December 2023 on Pre-Scoping
- Attendance at Fisantekraal Public Meeting (8 May 2024) and email comment sent 9 May 2024
- Formal Comment submitted 26 August 2024 on Scoping
- Updated Resolutions submitted 24 October 2024
- Attendance at Public Open Day on 20 November 2024
- Information Session 12 December 2024

The approved Bella Riva development is located immediately west of the proposed development. The valid approval in place is for a development with 3069 units and 10 000m² GLA over Farm 175, Remainder 123, Portion 2 of 123 and Portion 1 of 123. It has been included in the Urban Edge according to the revised City of Cape Town Municipal Spatial Development Framework and Northern District Plan as of 2023. A flexible development framework has been drawn up in order to ensure Bella Riva's adaptability to the possibility of the airport obtaining its approvals. Once Phase 1 of Bella Riva has been vested, a separate application will be launched in order to apply for the densification and additional GLA on Phase 2 and 3. To pre-empt this, we have designated mixed-use areas along the airport boundary. This approach maintains flexibility based on the airport's eventual outcome and positions Bella Riva to complement the airport by accommodating industrial and warehouse uses along its eastern border, should the airport plans proceed successfully. To date we have received in-principle approvals from Eskom, PRASA (bridge and station location) as well as the bulk water routing along Klipheuwel. The east-west link route alignment has also been approved by the relevant authorities.

The following sections will highlight our response to the detailed reports that formed part of the in-process EIA circulation.

1. Runway Design & Alignment:

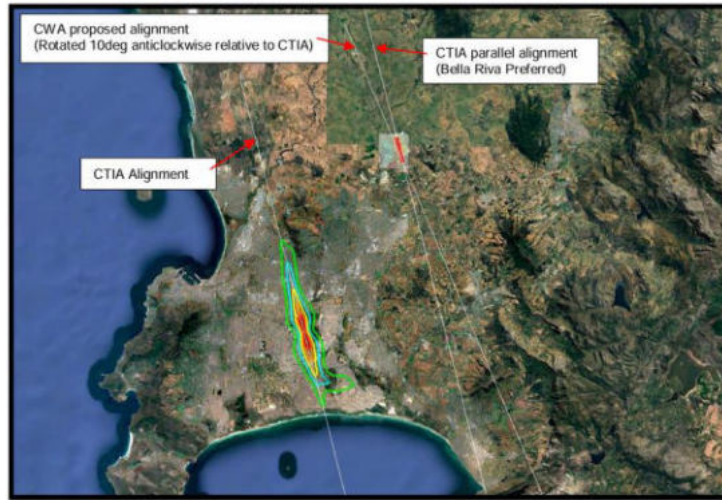


Fig. 1: City of Cape Town Airport vs. Cape Winelands Airport Alignment

The proposed alignment of the runway is not parallel with the City of Cape Town International Airport (CTIA) runway. Instead, it is rotated 10 degrees counterclockwise relative to CTIA alignment. Pivoting the proposed runway 10 degrees clockwise would achieve exact parallel alignment with CTIA while simultaneously minimizing the impact on Bella Riva. Among other reasons, the airport may have selected this orientation to minimize cut-and-fill civil costs. However, Bella Riva has already accommodated CWA by converting a substantial portion of our land into a mixed-use area and strategically positioning it along the airport boundary.

We strongly recommend considering this alternative. Although it may slightly increase runway costs, it will also provide significant benefits. These include more usable space for airport development to the east, reduced impact on the Lucullus extension, and the potential for expanded airport commercial and industrial activities. In so doing enhancing the airport's overall economic impact.

1. CTIA has secured approval to realign the runway as per the position indicated by the black line on the diagram. CTIA has confirmed that it will be proceeding with this project, in line with the EIA approval. Based on this the CWA runway alignment is most suitable to allow for optimum design and integration of the broader airspace with CTIA.

In the most recent discussions between the two parties it was agreed that CWA will procure Bella Riva land parcels that might be affected by noise, the intention being to eventually apply for and use such land for commercial and light industrial activities.

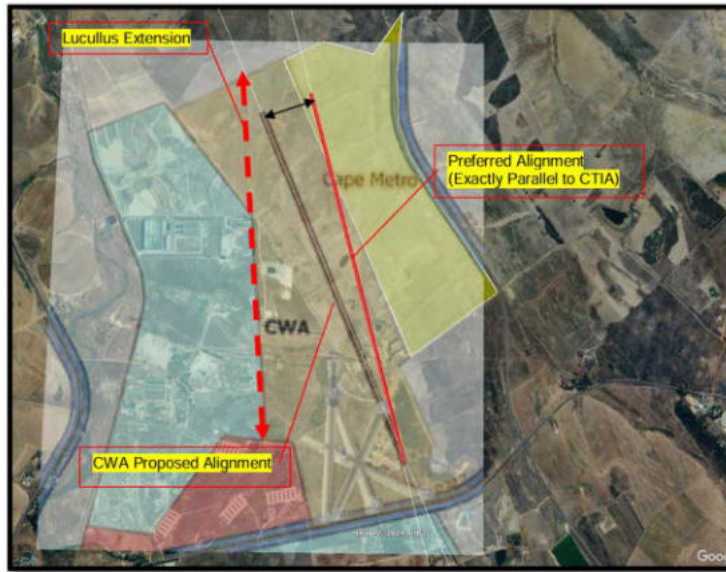


Fig. 2: Preferred Re-Alignment of Runway

2. Noise Impact Assessment:

It is noted that the report highlights Bella Riva as an Urban Residential (55dBA) development. The following alternatives were studied: 1) Operating the current runways at its highest capacity, 2) Operation of the new runway in the first operational year, 3) Operation of the new runway at maximum capacity. Alternative 3 is identified as the preferred alternative by the Cape Winelands Airport.

2.

Response from specialist:

The 10-20 N70 events are not considered significant. It should also be noted that this number of events will only be reached by the year that the airport will reach capacity. The night-time N70, will not reach the Bella Riva development, as it is contained within the airport site.

In addition, the 55 dBA noise contour will not reach the Bella Riva Pockets 3 and 5, which indicates that residential development can take place within these zones.

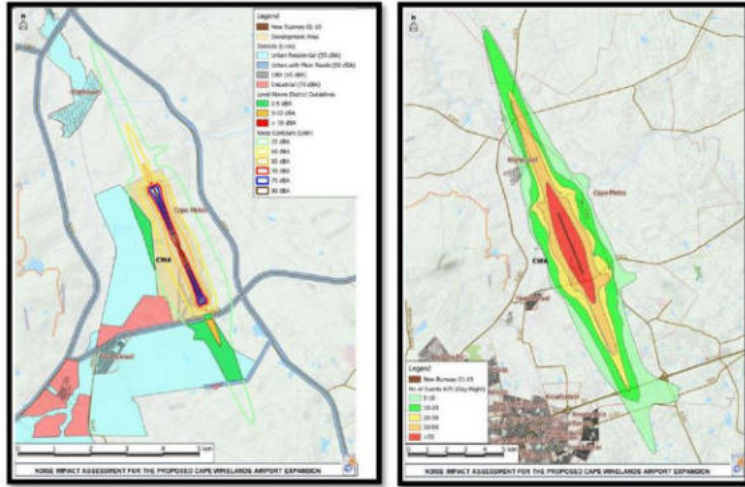


Fig. 3: Noise Rating Level Contours; Fig. 4: N70 Contours

Overlaying these onto the Bella Riva framework revealed the following. An estimated 12,7325ha of Bella Riva will be located within the 55dBa-60dBa noise contours. This is above the prescribed regulations for a residential area (55dBa). Our current framework provides for Mixed-Use zoning along this boundary. This enables flexibility for industrial or warehouse developments if the airport upgrade proceeds, or for commercial and/or residential uses if it does not. Mixed-Use zoning is critical, as it ensures Bella Riva can adapt effectively in the event the airport development does not materialize.



Fig. 5: Portion of Bella Riva above Prescribed Noise Rating Regulations

The study also shows the N70 contours. This was explained by the Cape Wineland Airport noise consultant to be different than the noise rating level contours. It represents the number of times an event over 70 dBA could occur per day. As per the above figure (4), it shows an exceedingly higher impact than the noise rating level contours themselves.

As shown in Fig. 6, the majority of Pockets 3 and 5, designated for low-density residential use, are impacted by 10–20 daily 70dB events. This will significantly affect the saleability and value of these units. This is particularly concerning as Bella Riva relies on these pockets for higher-end residential developments to offset the lower-margin high-density areas and meet our inclusionary housing requirements. Initially we planned to position the higher-end residential units near the airport on the highest-elevation land, which made them the most desirable. However, to accommodate CWA, we converted this prime land into a mixed-use area.



Fig. 6: Portion of Bella Riva above 30 events per day

Our client is open to engage with the Cape Winelands Airport team in order to discuss a possible land deal for them to take over these effected pockets of land at market value. This could potentially minimise the foreseen risk associated in relation to the noise impact. We have requested the digital files from the noise consultant to accurately determine the effect on Bella Riva. As such, we reserve our right to further comment once these have been made available to us.

3. Transport:

The route alignment of the proposed east-west link road through Bella Riva has been approved by the relevant authorities. This together with the in-principle support for the Melish station location from PRASA. The proposed airport SDP is not in alignment with this access.

3. Response from ITS:

Alignment of East-West Road:

It was our understanding that this was the approved EA for this route, but we were informed at one of our Transport PMT meetings in September 2024 that the alignment had changed. However, subsequent to a meeting with the developers in December 2024, it was agreed that the final



Fig. 7: Positioning and Alignment of Access along Lucullus Avenue

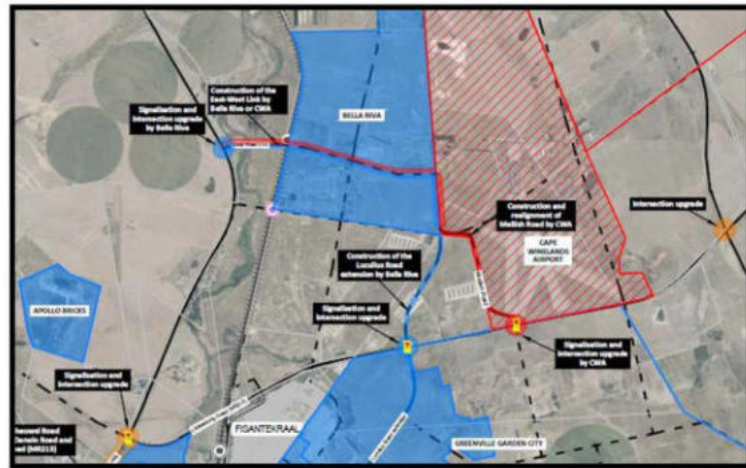


Fig. 8: Portion of Bella Riva above Prescribed Noise Regulations

Bella Riva will bring significant infrastructure to the area, including electrical substation, water pipelines, bridge, and road infrastructure. Specifically the bridge and east-west road traversing Bella Riva which is vital for the Airport's accessibility. It is noted that the Cape Winelands Airport traffic consultant is busy with a Master Traffic Study in order to understand all the requirements for the area, which will be linked to the

intersection point along Lucullus Road would be mutually discussed and agreed upon with the City of Cape Town

Construction of the Est West link road:

The phasing of transport infrastructure will largely be development driven in this area and the east-west link road will certainly be a major access to the airport. However, Melish Road that currently traverses the airport site from Lichtenberg Road in the south and continues northwards to the proposed intersection with the future East-west Link, will be upgraded to provide full capacity for airport and Bella Riva traffic until the northern extension of Lucullus is constructed. A collective approach is supported to construct the required road infrastructure from Development Charges by each development. Our understanding is that the first section of the East-West link road will be constructed as part of Bella Riva phase 1. The construction of the eastern section towards the airport will depend on the needs of developments after phase 1.

demand from various developments. As per below figure the construction of the east-west link road could be constructed by either Bella Riva or the Cape Winelands Airport. We welcome a collective approach to ensure the sufficient upgrading of transport infrastructure in the area.

4. Proposed Bioreactor

The proposed placement of the bioreactor directly on Bella Riva's boundary is concerning. As previously mentioned, we have already converted our most desirable high-elevation land to Mixed-Use zoning to accommodate the airport. We request that the airport reconsider this placement to avoid further burdening Bella Riva by situating this facility in a location where its impact on us is maximized.

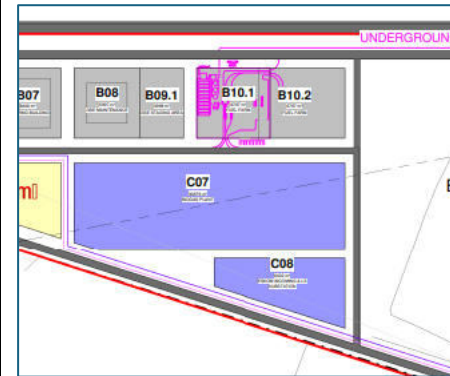
Furthermore, we request detailed information regarding the environmental safety of positioning the bioreactor in close proximity to areas of significant human activity. Considering that bioreactors utilize animal waste products, their presence in the middle of a human activity hub raises serious health, safety, and quality-of-life concerns.

5. Conclusion:

We remain open to collaborating with the Cape Winelands Airport team to identify mutually beneficial alternatives that support both developments and the broader area. Our aim is to achieve solutions where compromises are equitably shared between both parties. It is crucial to avoid placing the burden of compromise solely on Bella Riva. Bella Riva is proud to contribute essential infrastructure and amenities to the area. Including a school, bridge, roads, water pipelines, electrical substations, and inclusionary housing. We trust that CWA and Council will recognize that Bella Riva must also be feasible in order to deliver this infrastructure and community amenities.

4.

Response from EAP: The biodigester is placed at location C07 within the Services Precinct.



The Biodigester will no longer use chicken manure as input feed.

5. CWA response:

The CWA Team has been encouraged by the level and quality of engagement with the Bella Riva development team, the last meeting happened in December 2024, follow up meetings have been scheduled for the early part of this year. A large part of the effort and time is being focused on creating greater alignment between these two developments, joint meetings are also now convened between the two teams and the likes of the COCT. We are confident that the outcomes of these engagements will be positive and constructive.

		It is our understanding that there will be another public participation process during the Environment Authorisation. We reserve our right to provide further comment during this and other processes.	
331	Janessa Stockhall – Village Action Network	Email dated 13 December 2024: 1. Please see attached comments as per your public participation process.	Email response provided 14 December 2024: 1. Your concerns will be recorded and responses provided in the Comments and Responses report to be circulated for comment early 2025. You will also be registered as an IAP for the proposed project if you are not already registered.
		Letter received via email dated 13 December 2024: 1. Village Action Network (V.A.N) is a registered NPC. Our focus is on building thriving communities by networking, advocating and connecting resources. We have been actively operating in the greater Durbanville area since 2020 and work closely with the communities, NPO's, NGOs and community leaders of all the areas including Fisantekraal. We form part of the existing social network of care operating in the Fisantekraal and work closely with all the NGOs, NPOs and community leaders. Our work spans local government (representing ward 105 Community Based Organisations) at ward committee level as well as being an active member of many community based organisations. We have a good understanding of both the Fisantekraal community as well as the Durbanville community in terms of challenges and community assets. As such, our comments and concerns come from a place of being deeply connected to the people of the areas who will be immediately and directly affected by the proposed new airport, with practical insights to the potential implications of the new proposed Cape winelands Airport. At the outset I would like to state that the time frame given to comment as well as having the deadline in December, has made it exceptionally challenging to read through all the EIA reports which are wordy and technical and difficult for the layperson to wade through and understand.	1. The background information provided and comment is noted.

2. THE ROAD REPORT

Our main areas of concern with regards to the roads and noise are:

- 2.1. The Lichtenberg Road and its proximity to Fisantekraal High School with the increase in noise.
- 2.2. The airport's extremely close proximity to the community of Fisantekraal.
- 2.3. The proposal to extend Lucullus Road through the densely populated residential area of Fisantekraal, with safety and security concerns for residents, pedestrians and road users.
- 2.4. A major concern around the increase of noise pollution to the community of Fisantekraal with the negative side effect is on health and mental health.

3. I wish to bring to your attention the Lichtenberg Road running straight past Fisantekraal High School. Of particular concern is:

- The increase in traffic and the noise associated with it
- The noise pollution associated with having a busy airport under 2km away from a place of learning. Within 500m of Fisantekraal high school exists:
 - Won Life Pre school
 - Trevor Manual Primary School
 - Fisantekraal Primary School and
 - Aquila High school.

A report released by the University of Toledo entitled: Noise Pollution (Noise-Scape) Among School Children, written by: Lori A. Pakulski, PhD, CCC-A, Jennifer Glassman, MA, CCC-SLP, Katherine Anderson, BA and Erica Squires BS. – suggests the following:

2. Response from ITS:

- 2.1. Lichtenburg Road is a City of Cape Town municipal Class 2 road as indicated in their Right-of-Way Road Hierarchy plan contained in the approved Comprehensive Integrated Transport Plan. Unless the city declassify this road to a lower order, all developments need to plan in accordance with the public right-of-way road network.
- 2.2. Noted
- 2.3. Refer to point 1. The northern extension of Lucullus Road is part of the City's approved road network. The extension through Fisantekraal is largely facilitated by the Greenville development proposals.
- 2.4. EAP response: Mitigation measures are proposed in the Noise IA (refer Appendix 5).

3. Response from ITS:

It appears from Google Earth imagery, that the Fisantekraal High School was constructed during the end of 2011 (see extract below).



The City of Cape Town's 2006 ITP indicates Lichtenburg Road a Class 1 expressway which was before the school was constructed. Subsequent ITPs have declassified this road to Class 2.

Students' daily noise exposure presents an underlying threat in many classrooms that undermines student engagement, access to curriculum, and other important indicators of achievement. Students with and without hearing loss are at risk. Educational audiologists are uniquely positioned to promote awareness and work collaboratively to improve student outcomes.

While people generally consider harmful noise as the extremely loud sounds that can cause immediate hearing loss, research indicates that chronic noise exposure even at moderate levels can also result in irreversible damage (OSHA, 2014). Specifically, psychological and physiological effects of chronic noise exposure, which can impact health, brain development, and learning, have been demonstrated. Moreover, chronic noise exposure is now considered a topic for action among children (World Health Organization [WHO], 2010) because of its adverse effects on cognition, attention, reading acquisition, and memory, as well as other physiological and psychological mechanisms (Flexer, 1999; Haines, Stansfeld, Berglund, & Head, 2001a; Haines, Stansfeld, Soames, Berglund, & Head, 2001b; Klatte et al., 2010; WHO, 2004). Nevertheless, an increasing number of school children routinely experience chronic overexposure to noise (Klatte et al., 2010; Lercher, Evans, & Meis, 2003).

The unfavorable academic, psychological and physiological outcomes associated with chronic noise exposure are often overlooked by parents and educators. Possible reasons for this oversight include: a) negative consequences of noise overexposure are not widely recognized; b) symptoms may be subtle, and vary widely, and c) students may compensate, at least initially. Further, more commonly recognized student concerns, such as attention deficit disorder or behavior problems, may be blamed. Even if noise-scape is suspected, some parents and educators may consider the effects of chronic noise exposure to be unavoidable.

<https://www.edaud.org/journal/2016/5-article-16.pdf>

Given that the children within these educational facilities already face significant learning challenges which include overcrowding in the classes, the increase risk to them in terms of:

- drop out rates increasing and
- behavioural issues increasing

Response from noise specialist:

Under full development and maximum capacity (Scenario 3), the 55dBA noise contour for the CWA remains well beyond 1.5 km from the nearest school in Fisantekraal, Fisantekraal High School. Other schools are located even further away and will experience a lesser impact from the aircraft operations.

Furthermore, an analysis of the N70 contours for Scenario 3 indicates that the contour with 5 to 10 noise events will not extend to Fisantekraal High School. This implies that noise levels momentarily reaching 70dBA will occur fewer than five times per day, each lasting only a few seconds—well within acceptable limits for a school environment.

It is important to note that these event frequencies are projected to occur only after more than 20 years of CWA operations.

is well warranted as a concern. The dropout rate between grade 1 and grade 12 has already been identified as a major problem that contributes toward youth unemployment in South Africa. In South Africa, the overall dropout rate from grades 1 to 11 is around 4%. However, the dropout rate varies by grade, with the majority of dropouts occurring in grades 9 to 11.

- Grade 10: The dropout rate is 14.84%
- Grade 11: The dropout rate is 24.08%
- 15-year-olds: The dropout rate is close to 3%
- 17-year-olds: The dropout rate is nearly 9%
- 18-year-olds: The dropout rate is 29.3%
- 19-year-olds: The dropout rate is 46.3%

Noise Induced Hearing Loss

Although daily noise doses may not reach intensity levels commonly associated with noise induced hearing loss (NIHL), there is evidence that chronic exposure to moderate levels may cause permanent damage to the sensory cells of the ear (Johnson, n.d.). Further, the increasing use of personal electronic devices

Therefore the noise from both the airport as well as the noise from the increased traffic on the Lichtenberg Road running past the high school is a high concern. When the airport is operating at capacity, I would like to propose that the residents and students will consistently be exposed to unhealthy and dangerous noise levels. As can be seen from the above study, prolonged/chronic exposure to even moderate noise levels can have severe and permanent damage. Given that your report states that the expected noise levels are going to be within the high range, one can immediately see that this is not going to work well for the student’s abilities to learn in a learning friendly environment with planes taking off and landing over them. As per your report the noise alongside Fisantekraal directly opposite Fisntekraal High School is HIGH (55 dBU) and The World Health Organization (WHO) recommends that background noise in classrooms should be no more than 35 decibels:

The location of the school next to a road is not ideal. However, there are numerous schools in the Western Cape that are situated in similar busy roads.

For the Fisantekraal High School, the main noise contributing source is and will also be in the future the vehicular traffic due to the proximity of the school to the road.

The SANS design guideline for educational buildings for indoor noise is 35dBA (Table 1 — Design and maximum rating levels for ambient noise for different areas of occupancy or activity indoors). This indoor guideline, with the assumption of open windows which provide a noise reduction of 10dB, implies that the outdoor noise levels should not exceed 45 dBA.

Table 4-6: New Runway System at Full Operation (Scenario 3)

Aircraft ID	Aircraft Model	Full Capacity Operations			
		Runway 01-19			
		Arr.	Circ.	Dep.	Total
A330-3	Airbus A330-300 Series	1	0	1	2
B737-3	Boeing 737-300 Series	2	0	2	4
B737-4	Boeing 737-400 Series	1	0	0	1
B737-8	Boeing 737-800 Series	13	0	14	27
B777-2ER	Boeing 777-200-ER	9	0	9	18
CL601	Bombardier Challenger 601	1	0	1	2
CNA172	CESSNA 172R	27	0	22	49
DHC6-3	DeHavilland DHC-6-300 Twin Otter	12	0	12	24
DHC8Q-4	Bombardier de Havilland Dash 8 Q400	2	0	2	4
EMB120	Embraer EMB120 Brasilia	4	0	4	8
ERJ145	Embraer ERJ145	16	0	16	32
GULF4-SP	Gulfstream IV-SP	8	0	8	16
PA28	PIPER WARRIOR PA-28-161	0	21	0	21
Total (24-hour)		96	21	91	208

Based on the operations simulation data, the aircraft movements were allocated for each hour of the day and night. The summary of the aircraft movements per hour can be seen in Table 4-6 further below. It is evident that no night-time operations are scheduled, and most of the movements take place between 09h00 and 16h00.

- Furthermore, given the above information, it would appear that 208 airplanes are expected to take off and land at CWA within largely the window from 09h00-16h00. This is a 7 hour period. (see above taken from the report) $208 / 7 = 29,7$ airplanes taking off and landing every hour during the school day. I would like to state that given the flight paths and the noise levels stated in the report – which are HIGH over a residential area, that the current placement of the runways is HIGHLY detrimental to the community of Fisantekraal. I would also like to bring the community of Klipheuwel in at this point. There is a residential community as well as 2 schools over which the current flightpath goes over. See below:

In order to increase the noise reduction of the structure and reduce the impacts under current conditions and the expected annual traffic increase, noise mitigation measures at specific structures should be investigated.

- Specialist response:

This number is not correct as the take off and the landing is taking place on opposite sides of the runway. The average operations for the busy day, which will take place more than 15 from the operational year for the hours between 08h00 and 15h00 is 17. Half of this number will take place towards the north and the south.

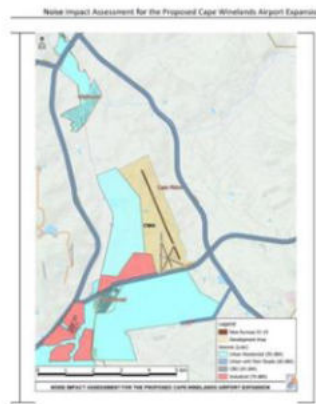
The average noise contribution at the Fisantekraal High School for the maximum utilisation (Scenario 3) is 44.3dBA (LAeq). The number of events that will momentarily exceed the maximum value of 70 dBA (LAmax), as the aircraft may take off or land, is less than 3 events.

These values are considered acceptable for an educational building. The vehicular noise will be the main contributing source at the Fisantekraal High School location.

Based on the discrete receptors positioned at the Klipheuwel Equitots School and the Klipheuwel Primary School, the Scenario 3 noise levels will be 45dBA and 50dBA, which is above the SANS design guideline for educational buildings.



Figure 4-3. New Runway 03/19 Flight Paths at Full Utilisation



14 October 2024

With regards to the above image on the right - I would like to query how it is possible for the noise levels to be at industrial levels (70dBA) directly opposite Fisantekraal and then literally across the road it drops to urban 55 dBA? I find this disingenuous and I would ask for new sound measuring to be done with much more thorough investigation into the sound levels on this community. I would also like to say that measurements of only 3 days is far too small a sample size to gain any verifiable data.

We respectfully disagree as to what is considered an acceptable noise level around learning institutions as well as communities for living. To be fair to this community – they have been living, working and attending school in Fisantekraal and Klipheuwel for decades. I would urge CWA to reconsider where the new runways will be placed and ask that they are situated further away from all existing residential and educational places.

I would furthermore suggest that due to the increase in traffic expected on the Lichtenberg Road, that a fork with a wide arc, be placed onto the Lichtenberg Road allowing the arc to continue past and the other fork to allow people to turn into the area. This will reduce the traffic volumes going past the area allowing only people turning into Fisantekraal at Dullah Omar Street be able to access the community. Given the children, dogs and safety risks that have happened on this stretch of road

Due to the fact that these levels are expected to be reached more than 10 years from the operational year of the airport, this location should be included in the noise monitoring that will be performed around the CWA, and mitigation measures should be investigated and considered.

Figure 4-5, which has the latest city planning zones, indicates the allowable noise levels for the relevant City Districts in Accordance with SANS 10103. This is only an indication of the allowable noise levels within these districts.

This inherent “incompatibility” arises from the fact that residential areas may border industrial zones. The responsibility for complying with the district noise levels falls on the owner or developer of the property and requires authorisation. Therefore, any business owner should ensure that their operations are not generating noise levels in the adjacent residential area that exceed the SANS District levels.

		<p>in the past, we would like to suggest that this will be an acceptable solution for both the residents and the CWA in terms of road access and mitigation of traffic volumes and noise associated with it.</p> <p>We therefore only partially agree with the suggestion of introducing the dedicated turn lanes as long as the remaining road is moved further away from the school up until the current taxi rank.</p> <p>The current traffic volumes at the Klipheuwel Road/Lichtenburg Road intersection warrant a traffic signal. Therefore, the following upgrades are recommended at this intersection:</p> <ul style="list-style-type: none"> o Northbound – Construct a dedicated right-turn lane. o Southbound – Construct a dedicated left-turn lane. o Westbound – Construct a dedicated right-turn lane. o Intersection control – Install a traffic signal. <p>With this upgrade in place, the Klipheuwel Road/Lichtenburg Road intersection is expected to operate at an acceptable LOS B, as shown in Figure A2.3 in Annexure A.</p> <p>5. Lucullus Road extension:</p> <p>Currently this road is set to connect from Joostenbergvlakte to Greenville. Then from Greenville down directly through the residential area, to connect onto the Lichtenberg Road. The connection between Joostenbergvlakte and Greenville is a solid plan as it will allow residents better access to Kraaifontein and in particular the day hospital which many residents need to make use of. The problem enters when Lucullus connects toward Lords Walk and onto Lichtenberg Road. The reasons that we oppose this extension is as follows:</p> <p>5.1. There are many children, dogs, cattle and goats that roam in this area. Having cars using this road as a throughroad is dangerous to the people and animals as well as posing a very high security risk to the drivers of the vehicles. We foresee pedestrians being injured, animals being hit by cars and a high likelihood of car jackings.</p> <p>5.2. The area is under policed as there is one police station currently with only 2 vans to patrol the entire Durbanville including Fisantekraal. To make use of Lords Walk will involve passing 3 schools: Aquila High School Fisantekraal Primary School and Won Life Pre School</p>	<p>5. The comment is noted.</p> <p>5.1 EAP response: Several future planned and proposed intersection and road upgrades to Lichtenburg Road is highlighted in the Transport Impact Assessment (Appendix 24).</p> <p>5.2 Response from CWA: Noted. CWA will collaborate with the SAPS and various security agencies.</p>
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		<p>5.3. The increase in risk to the vulnerable people groups in this area is disproportionate to the benefit of having the road come through this area.</p> <p>5.4. To suggest placing (cement) fencing along the road, as was attempted near the Cape Town International Airport, has shown us that this will not work. The Fence gets broken down and animals and people still access the area.</p> <p>6. We propose that people coming to CWA from the N1 either connect from</p> <ul style="list-style-type: none"> • The Stellenbosch turnoff • The proposed Amadeus road extension which should connect onto Canary Road which becomes Boy Bryers, thus skirting the outside of Fisantekraal and not through it. • The Joostenbergvlakte offramp to where Lucullus currently ends, go down Red Hill road and connect onto Canary/Boy Bryers coming out onto the Lichtenberg Road. <p>We strongly oppose the Lucullus extension through Fisantekraal along Lords Walk. This will end out causing an additional drain on police and medical resources as they attempt to manage a road situation that should not be placed into effect.</p> <p>7. There is considerably more I would have liked to comment on but the period for comments to be submitted has been too short. Given the amount of reading and research required to give a measured and thoughtful response, I really urge you to give a longer response time in your Public Participation Process next time.</p> <p>Thank you for considering our comments and input.</p>	<p>5.3 This concern and comment is noted by the EAP</p> <p>5.4. This comment is noted. The proposed fencing will be considered as upgrades are planned and completed.</p> <p>6. Response from ITS: The extension of Lucullus Road is also in support of the City's Road Network. Any developer is required to plan in accordance with this approved road map for the area. The road network is also critically important to improve mobility and stimulate economic growth. However, the extension of the R300 between the N1 and Klipheuwel will significantly reduce traffic demand along Lucullus towards the airport. We also agree that the R304 will provide a faster route to the airport from the east.</p> <p>7. Another round of public participation is planned for early 2025, as stated in the draft EIAR.</p>
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Late Comments: Environmental Impact Assessment Report (DEA&DP Ref: 16/3/3/2/A5/20/2046/24; DWS Ref No: WU33620)

[Comments received after 13 December 2024]

333	Etienne Roux – DEADP Directorate: Air Quality Management	<p>Email dated 17 December 2024:</p> <ol style="list-style-type: none"> 1. I trust you are well. <p>I note that I missed the deadline of 13 December 2024 to submit comments to you.</p> <p>Could I please ask for an extension to provide these comments to you by no later than Friday, 20 December 2024?</p> <p>Look forward to hearing from you.</p>	<p>Email response provided 17 December 2024:</p> <ol style="list-style-type: none"> 1. Thank you for the email You can send your comments by 20 Dec 2024 to me.
334	Alwyn Burger – Swartland Municipality	<p>Email dated 18 December 2024:</p> <ol style="list-style-type: none"> 1. Your correspondence dated 13 November 2024 regarding the subject refers. Swartland Municipality has no comments. 	<p>Email response provided 18 December 2024:</p> <ol style="list-style-type: none"> 1. Thank you for the email. We will record the feedback
335	Etienne A Roux - DEADP Directorate: Air Quality Management	<p>Email dated 19 December 2024:</p> <ol style="list-style-type: none"> 1. Please find attached comments on the above mentioned project from our Directorate. Kindly confirm receipt of this email. 	<p>Email response provided 19 December 2024:</p> <ol style="list-style-type: none"> 1. Thank you for the email and comments received.
		<p>Letter received via email dated 19 December 2024:</p> <p>COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIA), AIR QUALITY IMPACT ASSESSMENT REPORT (AQIAR), NOISE IMPACT ASSESSMENT REPORT (NIAR) AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT (EMPr) FOR THE PROPOSED EXPANSION OF THE CAPE WINELANDS AIRPORT WITHIN THE CITY OF CAPE TOWN METROPOLITAN IN THE WESTERN CAPE PROVINCE.</p> <p>The above-mentioned application, as received by the Department of Environmental Affairs and Development Planning (DEA&DP), Directorate: Air Quality Management (hereafter ‘the Directorate’) on 13 November 2024 has reference.</p> <p>The Directorate has the following comments on the draft EIA, AQIAR, NIAR, and EMPr in terms of the National Environmental Management: Air Quality Act No. 39 of 2004 (NEM: AQA):</p> <ol style="list-style-type: none"> 1. ATMOSPHERIC EMISSION IMPACT MANAGEMENT 	<ol style="list-style-type: none"> 1.

		<p>1.1. The draft EIA report indicates that the proposed development triggers section 21 listed activity, Category 2, Subcategory 2.4: Storage and Handling of Petroleum Products. This activity requires an Atmospheric Emission Licence (AEL) in terms of NEM: AQA and the City of Cape Town is the competent authority. It is further reported that the applicant will follow a phased approach in constructing the fuel storage:</p> <ul style="list-style-type: none"> a) Phase 1 will have the capacity of 480m3 b) Phase 2 will have the capacity of 800m3 c) Phase 3 will have the capacity of 1850m3 <p>1.2. The Directorate notes that the applicant will only lodge an AEL application when the Cape Winelands Airport intends to exceed the threshold of 1000m3 and that is anticipated to be during the year 2037.</p> <p>1.3. The Directorate notes that Scenario 3 will exceed NO2 1hour maximum concentrations and that the frequency of exceedances will be below the allowable exceedances of 88 per year.</p> <p>1.4. The Directorate recommends:</p> <ul style="list-style-type: none"> 1.4.1. Best practice measures to minimise potential air pollutants on-site to be implemented to reduce emissions to the surrounding environment. 1.4.2. Mitigation measures described on page 447 of the draft EIA report, as well as in the EMPr to be implemented. <p>2. DUST MANAGEMENT</p> <p>2.1. It is noted that dust may be generated during construction phase from land clearing, site preparations and levelling, bulk earthworks, material loading and hauling as well as vehicles and equipment traversing the site and unpaved roads.</p> <p>2.2. Dust generated from all the activities of the development must comply with the NEM: AQA, National Dust Control Regulations (Government Notice No. R. 827) of 1 November 2013.</p>	<p>1.1 Noted</p> <p>1.2 Noted</p> <p>1.3 Noted</p> <p>1.4 Noted</p> <p>2.</p> <p>2.1 Noted</p> <p>2.2 Noted</p>
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		<p>jurisdictional area. Mr. Gildenhuys can be reached on (021) 444 8364 or lan.Gildenhuys@capetown.gov.za.</p> <p>4.2. The Department would like to draw your attention to Section 28 of the National Environmental Management Act No. 107 of 1998 (NEMA), i.e. "Duty of Care" which states that: "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorized by law or cannot reasonably be avoided or stopped, to minimize and rectify such pollution or degradation of the environment."</p> <p>4.3. Please note that the above-mentioned comments/recommendations do not pre-empt the outcome of the application.</p> <p>4.4. No information provided, views expressed and/or comments made by the DEA&DP, Directorate Air Quality Management, should in any way be seen as an indication or confirmation:</p> <p>4.4.1. that additional information or documents will not be requested; or</p> <p>4.4.2. of the outcome of any application submitted to the authorities.</p> <p>4.5. Kindly be informed that the Directorate: Air Quality Management reserves the right to review the above-mentioned comments, should additional information come to light.</p> <p>5. Please contact Etienne Roux (Etienne.Roux@westerncape.gov.za) or Mzolisi Benxa (Mzolisi.Benxa@westerncape.gov.za) should you have any further queries in this regard.</p> <p>Please note that D: AQM has a dedicated email address reserved for all EIA related correspondences, DEADP.AQM@westerncape.gov.za. Kindly use this email for any future correspondence.</p>	<p>4.1 EAP response: The comment is noted. Direct engagement with Mr Gildenhuys is ongoing. Comment received from CoCT Air Quality Unit is included under comment nr 327 dated 13 December 2024.</p> <p>4.2 Noted</p> <p>4.3 Noted</p> <p>4.4 Noted</p> <p>4.5 Noted</p> <p>5. Noted</p>
336		Email dated 23 December 2024:	Email response provided 9 January 2025:

	<p>Mohlodini Kgomoitso - National Department of Water and Sanitation</p>	<p>1. Hope you are well Kindly find attached the comments on the above mentioned proposed activity</p>	<p>1. Thank you for the comments received</p>
		<p>Letter received via email dated 23 December 2024:</p> <p>DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED EXPANSION OF THE CAPE WINELANDS AIRPORT.</p> <p>Reference is made to the above mentioned document dated November 2024 with DEA&DP Ref: 16/3/3/2/A5/20/2046/24. This Department has perused the submitted application and has the following comments:</p> <ol style="list-style-type: none"> 1. The department notes the submitted Water Use Licence Application(WULA) with reference number WU33620 for the triggered Section 21(a), S21 (b), S21(c) and (i), S21(e), S21(f), S21(g) and S21(j) of the National Water Act, Act 36 of 1998: 2. No surface, ground or storm water may be polluted as a result of activities on the site. In the event that pollution does occur, this Department must be informed immediately. 3. The person who owns, controls, occupies or uses the land in question is responsible for taking measures to prevent any occurrence of pollution to water resources. 4. The comments issued shall not be construed as exempting the applicant from compliance with the provisions of any other applicable Act, Ordinance, Regulation or By-law. 5. All the requirements of the National Water Act, 1998 (Act 36 of 1998) regarding water use and pollution prevention must be adhered to at all times. 6. Please note that this Department reserves the right to amend and/or add to the comments made above in the light of subsequent information received. 7. Please do not hesitate to contact the above office should there be any queries. 	<p>Responses from EAP:</p> <ol style="list-style-type: none"> 1. Noted. Please note water uses 21(j) and 21(f) no longer forms part of the WULA application. 2. Noted and will be complied with 3. The applicant assumes responsibility for taking measures to prevent any occurrence of pollution to water resources. 4. Noted and will be complied with 5. Noted and will be complied with 6. Noted 7. Noted

338	Ismat Adams - Cape Nature	<p>Email dated 10 January 2024:</p> <ol style="list-style-type: none"> 1. See attached comment, my apologies for the delay. 	<p>Email response provided 10 January 2024:</p> <ol style="list-style-type: none"> 1. Thank you for the comments received
		<p>Letter received via email dated 10 January 2024:</p> <ol style="list-style-type: none"> 1. The medium to high negative pre-mitigation impact of the development as assessed by the botanical specialist is accepted, considering that the vegetation type to be impacted occurs in small patches within the site (about 5ha cumulatively) within a highly modified landscape. It is noted that the botanical specialist has indicated that the residual negative impact would be medium or even low provided the avoidance measures proposed and recommended biodiversity offset implemented for the parts of the naturally vegetated areas to be lost. It is further noted that the impacts of alternative 2 and 3 (preferred alternative) are essentially the same. The botanical assessment has assessed the baseline receiving environment/habitat that will be impacted by the proposed development. The botanical assessment is supported, all mitigation measures and recommendations must be implemented. 2. The faunal specialist has assessed a low negative residual impact to faunal species with potential faunal habitat on site assessed as low to intermediate sensitivity with more natural patches offering more diverse habitat while most of the site has been highly modified by agriculture and transformed by the current airport facility. The only avifaunal SCC confirmed on site is Blue Crane and forage and breed on cultivated areas. Recommended mitigation measures as per the faunal assessment include that any Blue Crane breeding areas discovered will require the input of an avifaunal specialist on the way forward. It is suggested that in such cases any breeding areas for Blue Crane be avoided and if they cannot be avoided that an avifaunal specialist provide measures to move nests or individuals (if this is possible) that can be included in the EMP. Other than this the faunal assessment is supported, and all recommendations and mitigation measures must be implemented. 3. It is agreed that the terrestrial biodiversity offset is warranted considering the fragments of critically endangered habitat that will be impacted by the proposed development, and the medium to high impact on these habitats as 	<ol style="list-style-type: none"> 1. Noted 2. Response from EAP The wildlife management plan will look at bird breeding areas on and near the site and bird strike avoidance. No Blue Crane breeding sites have been identified with the Bird Strike Risk Assessment so these measures will be developed when the wildlife management plan is developed. No Blue Cranes can breed on site as it will be a strike risk to the planes. 3. EAP response: a Terrestrial offset forms part of the proposed project mitigation measures.

		<p>assessed by the botanical specialist. Without the implementation of a biodiversity offset, the no-go option would need to be implemented.</p> <p>3.1. It is understood that the terrestrial biodiversity offset report has identified two candidate offset receiving areas that cover the area requirement for either shale, silcrete or granite renosterveld, and that negotiations for offsetting in these areas is currently underway with landowners. Considering that the offset receiving areas contain silcrete renosterveld which is the vegetation type of the very high botanical sensitivity patch that will be partly lost, and considering that the offset receiving areas also cover shale renosterveld and a high concentration of SCC, and will also meet the area requirements of the required offset, and will be feasible to implement, the two candidate sites should be ideal in providing an offset receiving area for the development. It is noted that the priority candidate site was meant for stewardship (that has stalled), but should offset negotiations be successful that this candidate site will become a reactive site rather than a proactive (stewardship) site.</p> <p>3.2. The offset specialist has calculated a 77ha offset required for the 5ha of critically endangered fragments of renosterveld that will be impacted by the proposed development. The basis of the habitat condition modifier in the offset area calculation is unclear – i.e. how was 0.6 determined?</p> <p>3.3. It is agreed that acquisition of the candidate offset sites is preferable, and that the offset sites should be afforded the highest legal protection available (Nature Reserve or Protected Natural Environment). Note that the conservation status of the offset receiving areas would need to be decided by the CapeNature Stewardship Review Committee, wherein the conservation value of the candidate sites are presented and a conservation status decided. Considering timeframes and negotiations currently underway, presentation to the Stewardship Review Committee will likely only occur after the competent authority has decided on the</p>	<p>3.1 Noted. The offset agreement will be amended and circulated for comment with the next round of PPP.</p> <p>3.2 Response from specialist: The impacted sites are unfenced, heavily trampled and overgrazed, with only remnants of the original vegetation present (Helme 2024) and are completely isolated from other patches and surrounded by actively planted fields. Primary ecological processes are not functioning. The candidate offset sites are large, intact portions with almost a full renosterveld species complement. Although the guideline allows a reduction to 0,5% (which is probably arguable in this instance) a modifier of 0,6X was selected to recognise that there are still 3 or 4 SCC surviving on the site in the face of the pressures. It is certainly acceptable ecological compensation at this level.</p> <p>3.3 Response from specialist: The sites have already been through the CN Site Review Committee and received Nature Reserve status. This implies that they are also eligible for any lower status.</p>
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application. This means a condition of authorisation would need to be included that indicates that the offset receiving areas are to be presented to the CapeNature Stewardship Review Committee for decision on conservation status. Such a condition should consider that the conservation status of the offset receiving areas is decided by the review committee, which limits the condition in terms of requiring a certain status to be assigned to the offset receiving areas. A proponent in presentation to the review committee may still state a preferred status for the potential conservation areas being presented (e.g. Nature Reserve). The CapeNature Stewardship Review Committee meets quarterly. The next meeting will be 13 February 2025.

3.4. It is agreed that should acquisition not be possible that lease agreements for the offset properties including management agreements and conservation servitudes should be pursued as a practicable option. But the lease agreements must be for at least 30 years to give effect to the purpose of the offset to inhibit development and maintain biodiversity on the properties for the long term. Proposals for conservation servitude would also need to be presented to the CapeNature Stewardship Review Committee for decision on conservation status.

3.5. It must be noted that the PBO selected for implementation of the offset should be responsible for the full management of the offset sites as the PBO is essentially implementing the offset on behalf of the developer in line with the polluter pays principle. The required offset should not add to the resource burden of the City of Cape Town Biodiversity Management branch, where such resources could be used elsewhere on City managed conservation areas and initiatives.

3.6. Regarding the offset condition proposed (section 8 offset report)

3.6.1. Point 1 indicates, "Prior to commencement, the applicant must conclude an offset implementation agreement(s) with a suitable person or organisation that secures in perpetuity..." It is suggested to add, "or at least for a period of 30 years", as there is a possibility that lease agreements are entered into rather than acquisition.

3.4 Response from specialist: This is disputed as a policy principle, as the criterion for identification of a candidate site is the presence of appropriate biodiversity on it (determined by the EIA specialist consultants), and not the status of the legal mechanism which is adjudicated as appropriate for that site. The means on protection is deliberately flexible in the guideline to allow effective implementation in circumstances where declaration is not possible. As a servitude is one such mechanism it does not require CN approval. In any event the sites have received NR status (already in 2013).

3.5 Response from specialist: Agreed. The condition is amended to reflect this more clearly.

3.6 Response from specialist:

3.6.1 There is jeopardy in here for authorities or there is a misunderstanding of this clause. This clause 1 of the proposed condition talks to an implementation agreement to secure the property – which must be in perpetuity to satisfy the offset principle and guideline. 30 yrs is not sufficient. If the comment is about the management liability – that is the subject of the second part of the clause – which speaks to the management and funding

		<p>3.6.2. Point 3 indicates, “Should the applicant fail to conclude such an implementation agreement or fail to capitalise an endowment through a public benefit organisation, prior to commencement with the activities, then:... The sum of R6 million becomes immediately payable to the City Of Cape Town, to establish or augment a fund for the management of all priority protected or conservation areas in the Klipheuwel Corridor not in City ownership.”</p> <p>This part of the condition provides an option for financial contribution to be provided in place of an offset should it not be possible to secure the terrestrial biodiversity offset. Point 3 of the condition is not supported, as the baseline environment/habitat to be impacted is critically endangered and has been assessed to be of conservation significance such that a biodiversity offset is required. Should it not be possible secure the biodiversity offset, then the no-go option would need to be implemented.</p> <p>4. The freshwater specialist has delineated a seep wetland and CVB wetlands within the project area. Both the seep wetlands and the CVB wetland have been largely modified and seriously modified respectively, while the anticipated change to the seep wetland has been assessed as high considering that there will be stormwater input and half the wetland area will be developed. Risk to all wetlands have been assessed as low with only seep 1 assessed as moderate.</p> <p>4.1. An on-site wetland offset has been proposed for developing part of seep wetland 1, wherein the remainder of the seep wetland and the CVB wetland will be rehabilitated to improve water and habitat quality. The wetland offset requires 3.97ha functional equivalent and 13haE for the offset.</p> <p>4.2. The freshwater specialist has assessed that the remaining seep wetland and CVB wetland more than meets the hectare and functionality requirements of the wetland offset, and it is noted that the avifaunal collision specialist has indicated that the proposed wetland offset location will not pose a threat to large birds or planes as no standing pools of water will be included in the seep wetland section of the offset area. The wetland offset is supported. It is noted that two access roads are planned</p>	<p>arrangements – not securing the site. The liability for site management falls to the EA holder for 30 yrs. And this is clear in part 2 of the proposed condition. But it is improper for a regulator to stipulate who and for how long an EA holder must contract with an implementer, as they must have the power to change implementers if there is unsatisfactory performance. They can’t be in breach of the EA conditions while trying to rectify and improve outcomes.</p> <p>3.6.2 See response to point 12.7.4 of the CoCT above. The comment is premised on a misunderstanding of the clause and its intention. If there is still disagreement, then this needs to be clarified with the authorities.</p> <p>4. Response from EAP</p> <p>4.1 Noted</p> <p>4.2 Noted</p>
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		<p>through the CVB wetland offset area and that offset calculations have included the area to be impacted by these roads.</p> <p>4.3. The wetland offset report indicates that, "...as none of these species have been identified within the seep wetland to be lost by neither the botanical nor the faunal specialists, the component of SCC was not included as part of the offset assessment. Should any of the above species however be identified within the rehabilitation area or offset area, these are to be removed prior to commencement of rehabilitation / offset activities." It is unclear why SCC should be removed from wetland areas that will serve as wetland offset areas.</p> <p>4.4. The wetland offset report indicates that, " Should additional offset be required as a result of potential future development in the vicinity of the CWA, the vision is to further improve the ecological functionality of the freshwater ecosystems from the current target of 56% for the seep wetland and 54% for the CVB wetland HGM unit to closer to 70%, thereby further improving the ecological condition and functionality of the freshwater ecosystems by between 14 and 16% to moderately modified (Category C) systems. This would allow additional compensation and offset of future impacts that may arise as the CWA precinct develops."</p> <p>It is unclear whether this includes reference to the future access road developments through the CVB wetlands or not as it was understood that the access roads through the CVB wetlands were included in the wetland offset calculation. Furthermore, will improvement to Category C be feasible?</p> <p>5. CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p>4.3. Response from FEN: This section was amended to state that "Should any of the above SCC or other indigenous vegetation be found within the rehabilitation or offset areas, these should be identified (and marked) prior to the commencement of rehabilitation activities and avoided during rehabilitation activities."</p> <p>4.4. Response from FEN: The offset investigation included the potential future access roads into the offset calculations. As such, the statement is based on any future development over and above what was assessed as part of the offset investigation. The necessary sections in the report have been amended to reiterate this. Refer to Section 6.1.1.</p> <p>A low Category C condition for the reach of the CVB wetland 1 to be rehabilitated can be achieved, provided that extensive rehabilitation measures be implemented. This will require further investigation and assessment of the possible implementation strategies when the time arises. Long-term monitoring will also be required to inform the extent and nature of the required intervention.</p> <p>5. Noted</p>
342	Bridget Johnsen - Paardeberg Sustainability Initiative)	<p>Email dated 21 February 2025:</p> <ol style="list-style-type: none"> 1. PSI Projects (formerly Paardeberg Sustainability Initiative) has represented the farming community in many activities and developments around the Paardeberg mountain, which lies less than 20km from the site of this airport. 	<p>Email response provided 21 February 2025:</p> <ol style="list-style-type: none"> 1. Thank you for the email I will register you and the PSI as an I&AP for the proposed project.

		<p>While we are not opposed to the development, we are concerned that we as affected public, have not been notified by the developers, other than via very public articles about a "possible" airport, until now, when better specifics are being revealed. There are several potential impacts ...positive and negative ...for the various landowners and nature reserves in the Paardeberg area.</p> <p>We are specifically concerned about the flight paths and orientation of the runway, which we do not understand fully at this point.</p> <p>Please send me the necessary documents to register as an I&AP, and to initiate further discussion with our farming community.</p> <p>Email reply dated 21 February 2025:</p> <ol style="list-style-type: none"> Any chance you could give a short presentation on a Farmers Day I am having on 20th March?? Would be good if one of the developers /senior team could come and speak to potential opportunities for the farmers... 	<p>The proposed project is currently in the Impact Assessment Phase, with another round of public participation planned.</p> <p>You will be included in the notification of this process and provided with access to the documents to consider and provide comment.</p> <p>Email response provided 21 February 2025:</p> <ol style="list-style-type: none"> Thank you for the invitation Bridget I will pass it on to the senior team to make contact and see re a presentation
343	Reon Vorster	<p>Email dated 21 February 2025:</p> <ol style="list-style-type: none"> Can you please add my name to the Interested and Affected group I am an interested party Reon Vorster [REDACTED] 	<p>Email response provided 21 February 2025:</p> <ol style="list-style-type: none"> We will register you as an IAP for the proposed project
344	Kathi Kotzen – Woodhill Racing Estate	<p>Email dated 21 February 2025:</p> <ol style="list-style-type: none"> We would like to become engaged at this early stage to ensure that flight paths, flying altitudes, frequency of take-off and landing, times /decibels of noise, fuel fallout, bird activity and many other issues are thought through and are accounted for or modified in the airport plans. I have quoted these concerns as recommended by the PSI. <p>We operate a racehorse/breeding operation a mere 12km from the proposed Winelands Airport, since 2001, when the area was agricultural land which suited the racehorses perfectly considering their highly strung nature.</p>	<p>Email response provided 21 February 2025:</p> <ol style="list-style-type: none"> Thank you for the email. We will register you as IAP for the proposed project and notify you of the next round of public participation.

		<p>Whilst we are not against the airport in essence, I ask you to please consider our animals and staff as they ride the horses each and every morning and can't afford injury to either. We have crop sprayers fly over and I must ensure they do not fly over our property as the horses are terrified by the noise and have hurt themselves quite badly on the track and in the stable.</p>	
245	Heritage Western Cape	<p>Letter dated 7 February 2025:</p> <p>RESPONSE TO HERITAGE IMPACT ASSESSMENT: FINAL COMMENT In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape Provincial Gazette 6061, Notice 298 of 2003</p> <p>HERITAGE IMPACT ASSESSMENT: PROPOSED DEVELOPMENT (RUNWAY AND ASSOCIATE INFRASTRUCTURE) ON PORTION 4 OF FARM 474 JOOSTENBERGS KLOOF, PORTION 10 OF FARM 724 JOOSTENBERGS VLAKTE, THE REMAINDER OF FARM 724 JOOSTENBERGS VLAKTE, PORTION 23 OF FARM 724 JOOSTENBERGS VLAKTE, PORTION 7 OF FARM 942 KLIPRUG, THE REMAINDER OF FARM 474 JOOSTENBERGS KLOOF, A PORTION OF PORTION 3 OF FARM 474 JOOSTENBERGS KLOOF, DURBANVILLE, SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)</p> <p>The matter above has reference. This matter was discussed at the Impact Assessment Committee (IACOM) held on 22 January 2025.</p> <p>1. FINAL COMMENT:</p> <p>1.1. The Committee has resolved to endorse the Heritage Impact Assessment (HIA), dated October 2024, and prepared by Aikman Associates, as having met the provision of Section 38(3) of the National Heritage Resources Act (NHRA), with specific reference to the following recommendations on page 29:</p> <p>1.1.1. The preparation of a Landscape Master Plan that includes a tree survey/tree planting and management strategy, an irrigation/stormwater strategy, detailed fencing and boundary interface proposals, detailed signage proposals, and a consolidated lighting proposal.</p>	<p>The letter received and contents thereof is noted by the EAP.</p> <p>The amended VIA will be communicated with HWC with a covering letter explaining the amendments which don't materially affect their assessment. HWC will be requested to amend their Final Comment and reference Revision 4 VIA February 2025.</p>

		<p>1.1.2. Further visual specialist input will be needed at the level of the Land Use Planning application and the future SDP planning phases.</p> <p>1.2. And including mitigation measures in the VIA prepared by Filia Visual dated September 2024 on page 113 to 129.</p> <p>2. HWC reserves the right to request additional information as required.</p> <p>3. Should you have any further queries, please contact the official above and quote the case number.</p>	
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Submissions via the Cape Winelands Airport Website			
Website No.	Name & Presenting unit	Issue/ Concern	Response
Late Comments from the In-Process Scoping Phase – Submissions received after 31 October 2024			
W260	Willem Faber	I would like to express my strong support for this initiative, which I believe has the potential to serve as a significant catalyst for tourism in the Western Cape Province. As a former Member of Parliament with experience in both Tourism and International Relations, I am confident that this initiative will positively impact the Western Cape economy. I wish you all the best in this endeavor, and please feel free to reach out if you require any advice or assistance.	This comment is noted. Willem Faber has been registered as an IAP for the NEMA process.
W261	Philip Guttentag - Fundipoint PTY LTD	I support this initiative fully.	This comment is noted. Philip Guttentag has been registered as an IAP for the NEMA process.
W262	Chris Powell	This is an incredible initiative which will help anchor the Cape Winelands as one of the most popular International tourist destinations in the world.	This comment is noted. Chris Powell has been registered as an IAP for the NEMA process.
W263	Gary Howden	It will bring job opportunities to the area and help with traffic congestion at the larger local airport	This comment is noted. Gary Howden has been registered as an IAP for the NEMA process.

W264	Mnqobi Makhanya - Deltron Projects	<p>I hope this message finds you well and thriving with the exciting development of Cape Winelands Aero's new airport project! Congratulations on this remarkable venture – it's bound to be an incredible addition to the region.</p> <p>I am reaching out on behalf of Deltron Projects, a multidisciplinary engineering and project management firm with a track record of delivering quality-driven, innovative solutions in various sectors, including aviation infrastructure. We specialize in project management, structural and civil engineering, quality management, and environmental consulting. Our experienced team collaborates closely with clients to deliver customized solutions that not only meet regulatory standards but also enhance the overall functionality, safety, and sustainability of each project.</p> <p>We would love to explore how our expertise could contribute to the success of your airport development.</p>	<p>This comment is noted. Mnqobi Makhanya has been registered as an IAP for the NEMA process. All potential service providers can register on the CWA website: https://capewinelands.aero/opportunities/#supp-reg</p>
<p>Environmental Impact Assessment Report (DEA&DP Ref: 16/3/3/2/A5/20/2046/24; DWS Ref No: WU33620) [30 day commenting period commencing on 13 November 2024 and up to and inclusive of 13 December 2024]</p>			
W265	Horatius Strydom - Progressive SMME Initiative Npc	<p>We support this development and see it as a opportunity to empower and capacitate SMME"s</p>	<p>This comment is noted. Horatius Strydom has been registered as an IAP for the NEMA process.</p>
W266	Alexandre Clauwaert	<p>Wishing a fast and safe start of operations</p>	<p>This comment is noted. Alexandre Clauwaert has been registered as an IAP for the NEMA process.</p>
W267	Rudi Engerke- E&E Buhr Trust	<p>Fully supportive of the development.</p>	<p>This comment is noted. Rudi Engerke has been registered as an IAP for the NEMA process.</p>
W268	James Tedder	<p>This new airport will boost the Western Cape economy as well as have a positive effect on the environment</p>	<p>This comment is noted. James Tedder has been registered as an IAP for the NEMA process.</p>
W269	Johannes Jooste	<p>I support the new Airport</p>	<p>This comment is noted. Johannes Jooste has been registered as an IAP for the NEMA process.</p>

W270	Alessandro Sacerdote	Let's go!	This comment is noted. Alessandro Sacerdote has been registered as an IAP for the NEMA process.
W271	Chris Pieterse - Cape town stainless steel	We want to be a manufacture off steel work as well off stainless steel pipes handrails, balustrades we also can provide a company profile	This comment is noted. Chris Pieterse has been registered as an IAP for the NEMA process. All potential service providers can register on the CWA website: https://capewinelands.aero/opportunities/#supp-reg
W272	Petr Luckhoff	The construction of the airport is in the economic interest of the population of the Cape Winelands, and the Western Cape as a whole. As a lifelong citizen of both Stellenbosch and Somerset West, I am wholeheartedly in support of this airport.	This comment is noted. Petr Luckhoff has been registered as an IAP for the NEMA process.
W273	Martin Muller	Kindly assist with provision of environmental impact assessments	Email response provided 3 December 2024: I noted your request Kindly assist with provision of environmental impact assessments. The draft EIAR is currently in 30-day public participation up to and inclusive of the 13th December 2024. Please find the draft EIAR and supporting documents for download and consideration at https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/ . EAP Response: Martin Muller has been registered as an IAP for the NEMA process.
W274	Hayley Carelse	I am ex cabin crew with Emirates Airline, and I'm passionate about all things aviation, particularly the business side. I've recently relocated back to Cape Town permanently and I'm in the process of completing my Master thesis (MBA Aviation Management). I would be happy to volunteer my services at Cape Winelands. It would be helpful to gain more insight for my thesis and also gain some experience all round.	This comment is noted. Hayley Carelse has been registered as an IAP for the NEMA process. All potential service providers can register on the CWA website: https://capewinelands.aero/opportunities/#supp-reg
W275	Roderick Cairns	I certainly support the notion of a second airport for Cape Town. If Johannesburg can support a Lanseria then with the rapid growth of the northern suburbs Cape Town could certainly do with an alternative option	This comment is noted. Roderick Cairns has been registered as an IAP for the NEMA process.

W276	Paul McWilliams - Paul McWilliams Architect	The development of the Cape Winelands Airport will be a great opportunity for the greater Cape Town area.	This comment is noted. Paul McWilliams has been registered as an IAP for the NEMA process.
W277	Mickeyde de Vos – Tad Steel	I am interested in aviation.	This comment is noted. Mickeyde de Vos has been registered as an IAP for the NEMA process.
W278	Chris Neville-Smyly	Sending my support for the opportunities this will bring to the Western Cape.	This comment is noted. Chris Neville-Smyly has been registered as an IAP for the NEMA process.
<p>Late Comments: Environmental Impact Assessment Report (DEA&DP Ref: 16/3/3/2/A5/20/2046/24; DWS Ref No: WU33620)</p> <p>[Comments received after 13 December 2024]</p>			
W279	Zane Williams - Pampoenkraal Business Forum	Due to the life changing socio-economic impact, this historic project are to have on not only myself, but rather the affected previously disadvantaged communities of Durbanville as a whole, unwavering support goes without saying. As mandated by the organisations we represent, this support are to be giving and demonstrated, unconditionally.	This comment is noted. Zane Williams has been registered as an IAP for the NEMA process.
W280	Shehzaad Mukaddam - NASR Corporation	Let's make this happen! There are several opportunities which this airport could help our company ease our logistics into the rest of Africa and the Middle East!	This comment is noted. Shehzaad Mukaddam has been registered as an IAP for the NEMA process.
W281	Andrew Smith - Sandown Capital	Supportive.	This comment is noted. Andrew Smith has been registered as an IAP for the NEMA process.
W282	Philip DeVries	Love the innovation being addressed here which portends building for the future of this region.	This comment is noted. Philip DeVries has been registered as an IAP for the NEMA process.
W283	Billy Griffiths - Passion for Wood	Baie sterkte, die Kaap kort al lank 'n nuwe lughawe.	This comment is noted. Billy Griffiths has been registered as an IAP for the NEMA process.
W284	Alfred Makondo	this will create more job opportunities and also a much needed service in the area	This comment is noted. Alfred Makondo has been registered as an IAP for the NEMA process.

W285	James Page-Macdonald - Nautical Steel	A fantastic initiative to turn FAFK into something truly great . Wishing you all the best with this project	This comment is noted. James Page-Macdonald has been registered as an IAP for the NEMA process.
W286	Alana Britz	This will be a good thing for many people in terms of jobs and development	This comment is noted. Alana Britz has been registered as an IAP for the NEMA process.
W287	Burt Smit	Seeing the aim is to uplift and uphold the area and its inhabitants, I definitely want to be kept in the loop. Thanks	This comment is noted. Burt Smit has been registered as an IAP for the NEMA process.
W288	Christopher Peppas	We at The Open Food Group wish all the role players and all of their support the very best with this quintessential idea - being brought now from thought to action.	This comment is noted. Christopher Peppas has been registered as an IAP for the NEMA process.
W289	Mervyn Jeptha	All the best on your future endeavours. Well needed and long overdue. Too much fog and wind at CPT. Not a welcoming site to Cape Town when landing for the first time over the slums. Good luck All the best	This comment is noted. Mervyn Jeptha has been registered as an IAP for the NEMA process.
W290	Chris Myburg	I hope this message finds you well. I am writing to express my strong support for the Cape Winelands Airport project. This initiative holds immense potential not only for enhancing regional connectivity but also for boosting tourism and economic development in the area. The Cape Winelands is renowned for its breathtaking landscapes and rich cultural heritage. An airport in the region will provide easier access for international and domestic travelers, showcasing the beauty of our vineyards and offering a gateway to explore our local attractions. Moreover, the airport will create job opportunities, stimulate local businesses, and encourage investment in the region. It represents a significant step forward in promoting sustainable growth and enhancing the quality of life for residents. I wholeheartedly support the efforts to bring this project to fruition and encourage all stakeholders to collaborate for its success. Thank you for your attention to this vital development. Best regards, Looking forward to partnering and a proactive collaboration with regard to property sales and leasing opportunities	This comment is noted. Chris Myburg has been registered as an IAP for the NEMA process.

W291	Jonathan Otto	It is an amazing and unbelievable opportunity for Cape Town to evolve	This comment is noted. Jonathan Otto has been registered as an IAP for the NEMA process.
W292	Michael McKenzie	Having preferred the efficiency and general ease of use of Lanseria airport over OR Tambo Airport, I fully support a second privately operated airport for Cape Town. Cape Town's growth and development trajectory will no doubt also benefit from this.	This comment is noted. Michael McKenzie has been registered as an IAP for the NEMA process.
W293	Brian Hingley	Please can you keep me updated on the domestic airlines planning to use your airport	This comment is noted. Brian Hingley has been registered as an IAP for the NEMA process.
W294	Billy Stewart	The aviation industry is key to the growth of the continent, and the growth of the continent will rely on the aviation industry for those transiting to, from, and within. Cape Winelands Airport is one such solution which will build confidence based on competence. Owners and operators will appreciate the alternative it presents, OEMs ought to also take notice.	This comment is noted. Billy Stewart has been registered as an IAP for the NEMA process.
W295	Stephen Viljoen	Suppliers of construction materials.	This comment is noted. Stephen Viljoen has been registered as an IAP for the NEMA process.
W296	Motlalepula Tshabalala	The Cape Winelands Airport represents an incredible opportunity to stimulate economic growth, job creation, and sustainable development in the region. Its proximity to Cape Town's CBD, combined with its strategic position in a globally recognized wine and ecotourism hub, makes it a vital gateway for both business and leisure travelers. Beyond tourism, the airport will drive innovation and industry development, supporting key sectors such as light industrial applications, logistics, technology, sustainability, and international trade. With a focus on green aviation and smart airport infrastructure, this project will create pockets of excellence in emerging industries while strengthening existing businesses. As the world moves toward sustainable, tech-driven economic growth, the Cape Winelands Airport will be a cornerstone of progress, opening doors for new investments, global connectivity, and job creation in South Africa's thriving Western Cape region. This is more than an airport—it's a catalyst for transformation. At Polybius Square LLC, we fully support this vision.	This comment is noted. Motlalepula Tshabalala has been registered as an IAP for the NEMA process.

W297	Kodey Pather	This vital transport node is required for socio-economic upliftment that has provincial, national and continental benefits while having no impact on environmental considerations. I fully and completely support the expeditious progress and await your updates.	This comment is noted. Kodey Pather has been registered as an IAP for the NEMA process.
W298	Charles Wolseley Brinton	We need this hub	This comment is noted. Charles Wolseley Brinton has been registered as an IAP for the NEMA process.
W299	Lizette Dayce	Looking forward to new oppotunies, i.e job creations rising from the new airport and keeping locals involved with the new development	This comment is noted. Lizette Daycehas been registered as an IAP for the NEMA process.
W300	Floris Coetzee	This will be blessing if the people from the West coast can board an international flight at Cape Winelands and not have to go into the city through Epping (crime haven). When my wife drops me off at Cape Town International, I always have the fear of my wife returning alone. Already one attempted hijacking close to Viking Road. Keep up the good work!!!	This comment is noted. Floris Coetzeehas been registered as an IAP for the NEMA process.
W301	Rudewaan Sulayman	I ALWAYS knew something BIGGER was destined for Stellenbosch Franschoek Durbanville.....stretched along to Hermanus Knysna George. 100% have my support. Please let me know how I may add value to this development.	This comment is noted. Rudewaan Sulaymanhas been registered as an IAP for the NEMA process.
W302	Hansie Hanekom	Great work just reduce the cost of flights	This comment is noted. Hansie Hanekom has been registered as an IAP for the NEMA process.
W303	Monalisa Bokwe	I would like to offer my Safety management expertise to drive tha safety management infrastructure of the airport.	This comment is noted. Monalisa Bokwe has been registered as an IAP for the NEMA process.
W304	Melanie Dorkin	The growth and success of the new airport will be a huge economic driver.	This comment is noted. Melanie Dorkin has been registered as an IAP for the NEMA process.
W305	Wazier Armardien	You have my full support	This comment is noted. Wazier Armardien has been registered as an IAP for the NEMA process.

Appendices

Appendix A (C293) – *Email communication related to Comment 293*

Appendix B (C298) – *Advert placed in the Tygerburger*

Appendix C (C321) – *Photo's provided as part of Comment 321*

Appendix D (C330) – *Attachments provided as part of Comment 330*

Appendix E (C341) – *Annexures to Comment 341*

Appendix F (C274) – *Updated CoCT officials list for inclusion in PPP notification*

olivia@phsconsulting.co.za

To: Meroline Ockhuis; paul@phsconsulting.co.za; Ian Gildenhuis; 'Gustav Griessel'; 'Deon Cloete'; 'Nick Ferguson'; amanda@phsconsulting.co.za; 'Natasha Bieding'
Subject: RE: COCT Air Quality Meeting Request: The proposed expansion of the existing Cape Winelands Airport, Fisantekraal, Western Cape.

From: Meroline Ockhuis <Meroline.Ockhuis@capetown.gov.za>
Sent: Thursday, 19 September 2024 08:17
To: paul@phsconsulting.co.za; Ian Gildenhuis <Ian.Gildenhuis@capetown.gov.za>; 'Gustav Griessel' <gustav@capewinlands.aero>; 'Deon Cloete' <d.cloete@capewinlands.aero>; 'Nick Ferguson' <nick@capewinlands.aero>; amanda@phsconsulting.co.za; 'Natasha Bieding' <Natasha.Bieding@westerncape.gov.za>
Subject: RE: COCT Air Quality Meeting Request: The proposed expansion of the existing Cape Winelands Airport, Fisantekraal, Western Cape.

Good morning Mr Slabber et al

I hereby acknowledge receipt of your email and the content is accordingly noted.
We concur with the proposed way forward.

Kind Regards

Meroline Ockhuis
Regional Air Quality Practitioner
Air Quality Management
Community Services & Health Directorate
246 Voortrekker Road, Vasco

WORKING FROM HOME DURING COVID-19

Tel: 021 400 2717 | **Cell:** 083 634 9058 | **Fax:** 021 590 5215 | **Email:** Meroline.Ockhuis@capetown.gov.za
| **Web:** www.capetown.gov.za

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From: Paul Slabbert <paul@phsconsulting.co.za>
Sent: Tuesday, 17 September 2024 13:01
To: Ian Gildenhuis <Ian.Gildenhuis@capetown.gov.za>; Meroline Ockhuis <Meroline.Ockhuis@capetown.gov.za>; 'Gustav Griessel' <gustav@capewinlands.aero>; 'Deon Cloete' <d.cloete@capewinlands.aero>; 'Nick Ferguson' <nick@capewinlands.aero>; amanda@phsconsulting.co.za; 'Natasha Bieding' <Natasha.Bieding@westerncape.gov.za>
Subject: RE: COCT Air Quality Meeting Request: The proposed expansion of the existing Cape Winelands Airport, Fisantekraal, Western Cape.

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Afternoon Ian

The e-mail chain below refers. We have consulted with the fuel engineers and the applicant copied in here.

A modular and flexible approach will be followed to construct the fuel storage containers.

The phased approach on the table, will start with:

Jet-A1:

- 6x 80m3 horizontals in 2028 (total capacity 480m3),
- Adding an additional 4x 80m3 horizontals in 2032 (total capacity 800m3).
- The 3x 350m3 vertical tanks should then be constructed and commissioned by 2038 (to bring the total to approx. 1850m3).

Avgas:

- Adding the Avgas tanks (2x 30m³ + 1x 9m³):
- Total 549m³ in 2028, 869m³ in 2032 and 1919m³ in 2038.

The commercial retail service station, the current concept provided with 4x 23m³ underground storage tanks. However we understand through consultation and comments from CoCT that this component does not form part of an AEL application in any event.

Totals exclude any diesel bulk tanks for backup generators, but if one assumes it “replaces” the retail service volumes for AEL applicability calculation purposes it’s clear that an AEL application is only likely in 2037.

Flammable substance inventory table:

Description of equipment	Product	Additional capacity, m3			Comments
		2028	2032	2038	
		m3	m3	m3	
6x horizontal tanks, each 80m ³	Jet-A1	480			
2x double-walled horizontals, each 30m ³	Avgas	60			
1x 9m ³ aboveground tank (for general aviation airside)	Avgas	9			
4x horizontal tanks, each 80m ³	Jet-A1		320		
3x vertical tanks, each 350m ³	Jet-A1			1050	
4x 23m ³ underground storage tanks (commercial retail service station)	Petrol / Diesel	92			
	Totals	641	320	1050	
	<i>(cumulative)</i>	<i>641</i>	<i>961</i>	<i>2011</i>	

Therefore we will lodge an AEL application 6-12 months before CWA intends to exceed the 1000m³ and not part of this EIA process.

We will incl. a section re the above in the EIA Report for clarity to all I&AP’s and the authorities in order to communicate that an AEL is not required initially. However we will continue to assess AQ and we will consider your comments and future comments as good practice.

Please confirm that you concur with the above and if you need any specific information or references going forward.

Kind Regards
Paul Slabbert
0827408046

From: Ian Gildenhuis <Ian.Gildenhuis@capetown.gov.za>

Sent: Friday, 06 September 2024 07:02

To: paul@phsconsulting.co.za; Meroline Ockhuis <Meroline.Ockhuis@capetown.gov.za>

Subject: RE: COCT Air Quality Meeting Request: The proposed expansion of the existing Cape Winelands Airport, Fisantekraal, Western Cape.

Good day Paul

Thanks for the e-mail.

The AEL trigger is based on the design capacity of the storage tanks. It is my understanding that If the design capacity is capable of storing above the threshold, then effectively the requirement for an AEL is triggered.

Thus, if the tanks will all be commissioned at the same time an AEL is required, if however they will be constructed and commissioned in a phased manner, then the AEL application would need to be made 6 months prior to the threshold of installed capacity being reached.

I hope this helps

Regards

Ian Gildenhuis
Head Specialised Environmental Health
Air Quality Officer
Grade 1 EMI
Community Services and Health Directorate
246 Voortrekker Road, Vasco



From: Paul Slabbert <paul@phsconsulting.co.za>
Sent: Thursday, 05 September 2024 14:52
To: Meroline Ockhuis <Meroline.Ockhuis@capetown.gov.za>; Ian Gildenhuys <Ian.Gildenhuys@capetown.gov.za>
Subject: RE: COCT Air Quality Meeting Request: The proposed expansion of the existing Cape Winelands Airport, Fisantekraal, Western Cape.

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Afternoon Ian and Meroline

I've been working with Demos on some aspects of the AEL.

We realise as per fuel masterplan that the required storage volume of the fuel farm will only exceed 1000 m³ around 2037/8. See the graph below, storage indicated on the right bar, going over 1000 m³ after 2037. The fuel plan states "It is proposed that the storage capacity be installed as required" therefore phased. How do we deal with this? does it mean a AEL is really only needed when the threshold as per AQA is reached?

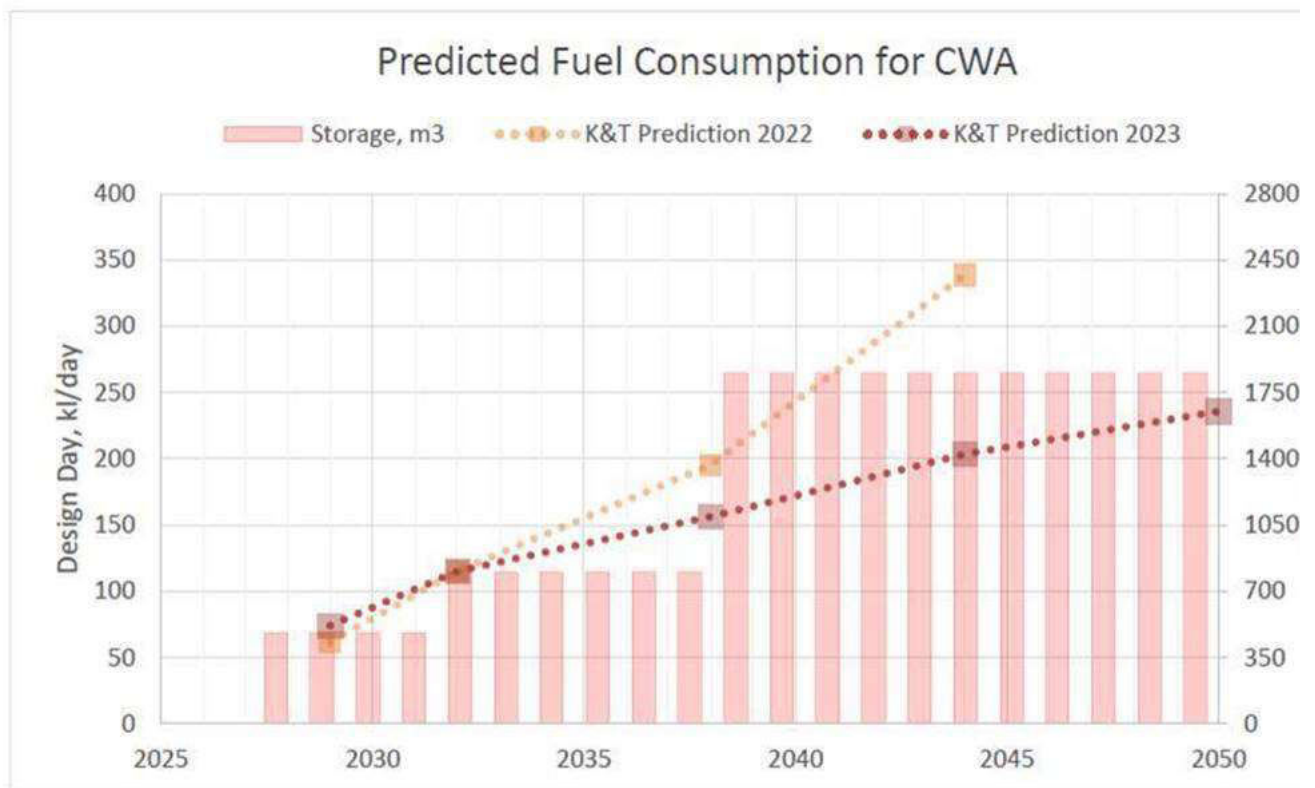


Figure 1.1: Predicted Fuel Consumption for CWA for period 2029 to 2050, with storage capacity

Regards
Paul Slabbert

From: Meroline Ockhuis <Meroline.Ockhuis@capetown.gov.za>
Sent: Wednesday, 14 August 2024 07:42
To: André-Pierre Gouws <ap@phsconsulting.co.za>; Ian Gildenhuys <Ian.Gildenhuys@capetown.gov.za>

Cc: paul@phsconsulting.co.za

Subject: RE: COCT Air Quality Meeting Request: The proposed expansion of the existing Cape Winelands Airport, Fisantekraal, Western Cape.

Good morning Mr Gouws/ Mr Slabbert

Thank you for your response.
All good, I will send out a meeting request shortly.

Kind Regards

Meroline Ockhuis

Regional Air Quality Practitioner
Air Quality Management
Community Services & Health Directorate
246 Voortrekker Road, Vasco

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Tel: 021 400 2717 | Cell: 083 634 9058 | Fax: 021 590 5215 | Email: Meroline.Ockhuis@capetown.gov.za
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From: André-Pierre Gouws <ap@phsconsulting.co.za>

Sent: Tuesday, 13 August 2024 09:39

To: Meroline Ockhuis <Meroline.Ockhuis@capetown.gov.za>

Cc: paul@phsconsulting.co.za

Subject: Re: COCT Air Quality Meeting Request: The proposed expansion of the existing Cape Winelands Airport, Fisantekraal, Western Cape.

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Good morning Meroline,

Thank you for the feedback.

This date and time suits us. We hereby confirm our in-person meeting scheduled for Thursday 22 August from 14:00 – 15:30 PM at your offices.

Have a great day further.

Kind regards,

André-Pierre Gouws

BA (Hons) Geography & Environment
Candidate EAP (2023/6365)

PHS Consulting

Environmental, Heritage, Eco-Tourism and Land-Use

Cell: 082 523 1550

E-mail: ap@phsconsulting.co.za

Website: www.phsconsulting.co.za

Company Postal Address: P.O. Box 1752, Hermanus, 7200

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From: Meroline Ockhuis <Meroline.Ockhuis@capetown.gov.za>

Date: Tuesday, 13 August 2024 at 09:28

To: André-Pierre Gouws <ap@phsconsulting.co.za>, "paul@phsconsulting.co.za" <paul@phsconsulting.co.za>

Subject: RE: COCT Air Quality Meeting Request: The proposed expansion of the existing Cape Winelands Airport, Fisantekraal, Western Cape.

Good morning Mr Gouws/ Mr Slabbert

Trust that you are well.

I have discussed your proposed dates for a meeting with Mr Gildenhuys, unfortunately he is only available on the 22nd from 14h00-16h00.

Should this date and time not suits you, please propose alternative dates and times.

Kind Regards

Meroline Ockhuis

Regional Air Quality Practitioner
Air Quality Management
Community Services & Health Directorate
246 Voortrekker Road, Vasco

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Tel: 021 400 2717 | **Cell:** 083 634 9058 | **Fax:** 021 590 5215 | **Email:** Meroline.Ockhuis@capetown.gov.za
| **Web:** www.capetown.gov.za

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From: André-Pierre Gouws <ap@phsconsulting.co.za>

Sent: Monday, 12 August 2024 12:30

To: Ian Gildenhuys <Ian.Gildenhuys@capetown.gov.za>

Cc: Meroline Ockhuis <Meroline.Ockhuis@capetown.gov.za>; Lumko Vazi <Lumko.Vazi@capetown.gov.za>; Paul Slabbert <paul@phsconsulting.co.za>

Subject: COCT Air Quality Meeting Request: The proposed expansion of the existing Cape Winelands Airport, Fisantekraal, Western Cape.

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Good day Ian,

I hope you are well today.

We would like to schedule an in-person meeting with you and your team at your offices next week to discuss the Air Emission License Application pertaining to the Cape Winelands Airport Project. Please may you and your team indicate your availability for this meeting? We are available on either the 21st or 22nd of August between 10:00 AM – 14:00 PM. Your feedback would be much appreciated.

Thank you in advance.

Kind regards,

André-Pierre Gouws

BA (Hons) Geography & Environment
Candidate EAP (2023/6365)

PHS Consulting
Environmental, Heritage, Eco-Tourism and Land-Use
Cell: 082 523 1550
E-mail: ap@phsconsulting.co.za
Website: www.phsconsulting.co.za
Company Postal Address: P.O. Box 1752, Hermanus, 7200

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Ouers krap saam kop by Gene Louw

Die Laerskool Gene Louw het op 19 Oktober en 2 November sy eerste RoboRookies-robotikakompetisie vir grondslagfaseleerders aangebied.

Dit het behels dat gr. 2- en gr. 3-deelnemers elk saam met een van hul ouers werk om 'n robot volgens spesifieke instruksies te bou en te kodeer om sekere take uit te voer.

Die organiseerders het soveel inskrywings ontvang dat twee sessies vir elke graadgroep gereël moes word. Elke span se bouproses en kodering is beoordeel om 'n wenner per sessie te bepaal.

ChinguBots se Aikiro-robotikastelle, wat ook by die skool in die robotika-klas gebruik word, is vir die kompetisie ingespan.

NUUSKIERIG

“Behalwe om robotika op 'n prettige manier te bevorder, was hierdie inisiatief ook daarop gemik om ouers wat dalk nuuskierig is oor wat hul kinders in die robotika-klas leer, betrokke te kry en hulle die geleentheid te gee om op gelyke voet saam aan iets te werk,” sê Amanda Heath, die skool se kodering- en robotika-opvoeder vir die grondslagfase.

Te oordeel aan die terugvoer van deelnemers, het die kompetisie nie net in dié doel geslaag nie, maar alle verwagtings oortref.

Kurt, wat saam met Mia 'n robotkarretjie moes bou en kodeer, sê hy is verstom deur die impak van die ervaring. “Dit was ongelooflik. Dit was só lekker om saam met haar probleme op te los. Die logiese denke wat die kinders nou leer, is goed wat ons nooit geleer het toe ons jonk was nie.

“Die beste deel was dat ek en my pa lekker kon saamwerk ...”

- Karli van der Riet



Joshua Barnard (gr. 2) en sy ma, Deloryse, sit koppe bymekaar om hul robot te voltooi.

“Die beste deel was dat ek en my pa lekker kon saamwerk en tyd saam deurbring,” sê Karli van der Riet (gr. 3), wat saam met haar pa, Kobus, deelgeneem het.

Die gr. 2-wenners was Ruan de Wind en sy pa, Hanno, en Mia van der Walt en haar pa, Kurt. Van die gr. 3's het Salome Josling en haar pa, Jacques, en Euan Vosloo en sy pa, Basil, met die louere weggestap.



Ruan de Wind (gr. 2), wat met sy pa, Hanno, saamgespan het, ontvang sy prys van Amanda Heath, kodering- en robotika-opvoeder.



Mia van der Walt (gr. 2) het haar spanmaat, Pa Kurt, 'n ding of twee oor kodering gewys. Amanda Heath, kodering- en robotika-opvoeder, wens haar geluk.



Euan Vosloo (gr. 3), wat saam met sy pa, Basil, deelgeneem het, ontvang sy prys van Amanda Heath, kodering- en robotika-opvoeder.



Amanda Heath, kodering- en robotika-opvoeder, met Salome Josling, wat een van die wenontwerpe met haar pa, Jacques, se hulp gebou het.

PROPOSED EXPANSION OF CAPE WINELANDS AIRPORT

1) NOTICE OF PUBLIC PARTICIPATION PROCESS - COMMENTING PERIOD 13 NOV TO 13 DEC 2024

2) NOTICE OF A PUBLIC OPEN DAY ON 20 NOVEMBER 2024 AT GOEDGELEVEN VENUE, KLIPHEUWEL RD, DURBANVILLE FROM 14H00 TO 20H00

DEA&DP Ref No. 16/3/32/A5/20/2046/24

Notice is hereby given of an In-Process Public Participation Process (Statutory Environmental Impact Assessment Phase) in terms of the National Environmental Management Act, 107 of 1998 (NEMA), as amended, and the EIA Regulations 2014, as amended.

Application for authorisation to DEA&DP Development Management, to undertake the following activities: LN1: 9, 10, 12, 13, 16, 19, 24, 25, 26, 28, 48, 56, 61; LN2: 1, 4, 7, 15, 27; and LN3: 1, 2, 3, 4, 12, 18, 19. The procedures for a Scoping/EIA process are being followed for this application.

Registration of Waste Management Facilities at DEA&DP: Waste Management wrt the National Norms & Standards in terms of the National Environmental Management Waste Act, 59 of 2008.

Request is made for the DEA&DP: Development Management to define or adopt a Maintenance Management Plan for watercourses in terms of the National Environmental Management Act 107 of 1998, EIA Regulations, 2014, as amended.

DWS Ref No: Wu33620

Notice is hereby given of a Public Participation Process in terms of Regulation 267 of the National Water Act, 36 of 1998 (Government Gazette 40713 of 24 March 2017). An application for a Water Use Licence has been submitted to DWS Provincial.

The applicant wishes to apply for a Water Use Licence in terms of S21 (a); (b); (c & i); (e); (f); & (g) of the National Water Act, for the following activities: abstraction of water from boreholes; storage of water in stormwater ponds and reservoirs; impeding or diverting the flow of water in a watercourse; altering the bed, banks, course or characteristics of a watercourse; engaging in a controlled activity identified as such in section 37(1) or declared under section 38(1); discharging waste or water containing waste into a water resource; disposing of waste in a manner which may detrimentally impact on a water resource. -

Applicant: CAPEWINELANDS AERO (PTY) LTD

Location: The proposed site is located approx. 10.5km northeast of Durbanville, on the R312 and approx. 6km North of Joostenberg Vlakke, on the R304. The development area is located on the following farms: 10/724, RE/724, 23/724, 7/942; RE/474, 3/474, 4/474.

Proposal: A phased airport development approach that includes the construction of a primary Code 4F runway with a length of 3.5km. Associated airport infrastructure for landside and airside use will also be phased based on market demand.

Availability of report and opportunity to participate: The In-Process Draft Environmental Impact Assessment Report, Water Use License Technical Report, Waste Management Plan, Maintenance Management Plan and supporting documents will be available on our website www.phsconsulting.co.za, and a hard copy will be at the Fisantekraal Public Library (021 444 9259) for a 30 day commenting period, from 13 Nov 2024 up to and inclusive of 13 Dec 2024. Should you not be able to access the report, please contact the Environmental Assessment Practitioner (EAP) at the details below.

THE PUBLIC IS WELCOME TO ATTEND THE OPEN DAY ON 20 NOVEMBER 2024 AT GOEDGELEVEN VENUE, KLIPHEUWEL RD, DURBANVILLE FROM 14H00 TO 20H00.

You are welcome to register and/or provide written comments on the application. Further correspondence on this application will only be with registered Interested and Affected Parties (I&APs). Should you wish to register, individuals are required to send their name and contact details or comments to PHS Consulting at the contact details below. Individuals who need special assistance, may request assistance in recording their comments or objections, at the details below. Alternatively, a voicenote can be sent via Whatsapp to the cell number below.

EAP Contact Information:



PHS CONSULTING (Attention: Amanda Fritz-Whyte)
Address: PO Box 1752, Hermanus, 7200
Tel: 028 312 1734; Cell: 072 630 8716 (whatsapp)
Email: amanda@phsconsulting.co.za

Curro dribbles into Cape Town with soccer schools

Curro Holdings is expanding the Pitso Mosimane Soccer Schools (PMSS) programme to six additional schools in 2025, including Meridian Pinehurst in Durbanville and Curro Academy Sandown in Parklands – introducing the programme to the Western Cape for the first time.

With a total of 17 Curro schools now on board, the programme is driving a new era in youth soccer development across the country, according to a media release by Curro Holdings.

The other schools set to benefit from the programme include Curro Academy Mbombela and Meridian Karino in Mpumalanga, Curro Academy Wilgeheuwel in Roodepoort and Meridian Rustenburg in North West.

This expansion marks another milestone in Curro's ongoing partnership

with legendary football coach Pitso Mosimane, which began in January 2023.

The group made history as South Africa's first school group to collaborate with the coach, launching PMSS at Curro Northern Academy in Polokwane and Curro Meridian Cosmo City in Roodepoort.

The arrival of the PMSS programme in the Western Cape marks a significant milestone.

The programme is poised to make a meaningful impact on youth soccer development in the province, inspiring young players and cultivating a competitive, skill-enhancing environment.

The PMSS model provides a structured pathway for players aged 6 to 18, guiding them from grassroots development to high-performance training, according to the media release.

GENE LOUW SE NUWE HOOFLEIERS



Die Laerskool Gene Louw se hoofleiers vir volgende jaar is (van links) Megan Senekal (onderhoofmeisie), Lente Badenhorst (hoofmeisie), Philip van Wyk (hoofseun) en Jacques du Preez (onderhoofseun). FOTO: SASHA-LEIGH LEFEBUREG

Appendix C (C321)











2024/07/15 16:11

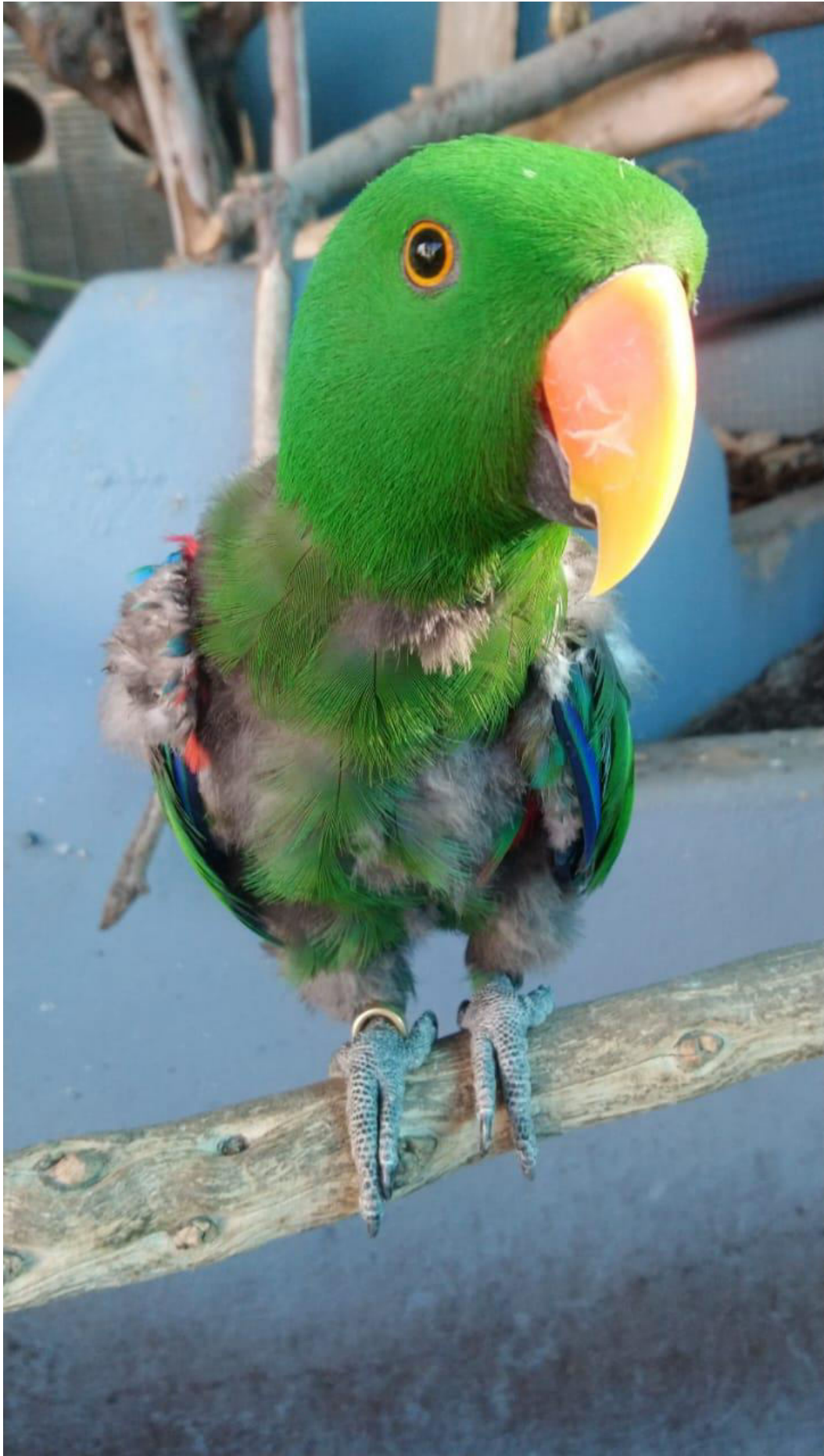
















2023/12/25 12:16













BILLTRADE 104 (Pty) Ltd

REGISTRATION No. 2006/028037/07

WINELANDS AIRPORT ON PORTION 10 AND 23 OF FARM 724, PORTION 7 OF FARM 942, REMAINDER, PORTION 3 AND 4 OF FARM 474

I/We, the undersigned, being the Director/s of the Company, hereby resolve:-

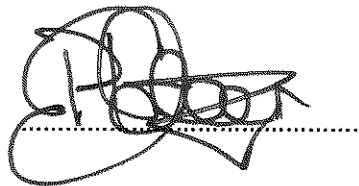
That JOHAN MOMSEN SMIT (REDACTED) be, and is hereby, authorised to sign any and all such documents required for the comment on the above mentioned application process as well as any other documents required for Council or any other authority submissions in this regard.

DIRECTOR

SIGNATURE

DATE

Mr PR Eksteen



8/10/24 2024

ID: (REDACTED)

BUNKER HILLS INVESTMENTS 311 (Pty) Ltd

REGISTRATION No. 2000/002622/07 (the Company)

WINELANDS AIRPORT ON PORTION 10 AND 23 OF FARM 724, PORTION 7 OF FARM 942, REMAINDER, PORTION 3 AND 4 OF FARM 474

I/We, the undersigned, being the Director/s of the Company, hereby resolve:-

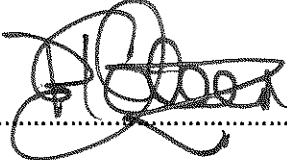
That JOHAN MOMSEN SMIT [REDACTED] be, and is hereby, authorised to sign any and all such documents required for the comment on the above mentioned application process as well as any other documents required for Council or any other authority submissions in this regard.

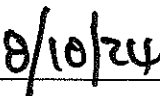
DIRECTOR

SIGNATURE

DATE

Mr PR Eksteen
[REDACTED]


.....

 2024

**POWER OF ATTORNEY
(REGISTERED OWNER'S CONSENT FORM)**

I, JOHAN MOMSEN SMIT ([REDACTED]) SAGE WISE 67 (Pty) Ltd,

Duly authorised as per the attached resolutions,

wish to certify that authority is hereby granted to:

Elco Property Developments – Karla Burger

To submit comment on our behalf to the proposed development on PORTION 10 AND 23 OF FARM 724, PORTION 7 OF FARM 942, REMAINDER, PORTION 3 AND 4 OF FARM 474 .

The undersigned therefore nominates, constitutes and appoints the above applicant with the power of substitution to be the registered owner's legal representative / agent and to act in the name, place and stead of the registered owner in the above regard. Power of attorney is accordingly hereby granted to the applicant to sign all correspondence in respect of the matter referred to above.

Owner's signature:



Date: 26 August 2024



100 YEARS
OF BUILDING COMMUNITIES
GARDEN CITIES CENTENARY 2019

50 LOUIS THIBAUT DRIVE
EDGEMEAD 7441

TELEPHONE [REDACTED]

GARDEN CITIES

NON PROFIT COMPANY (RF)

REG. NO. 1928/000607/08

ALL CORRESPONDENCE TO BE ADDRESSED TO:

THE CHIEF EXECUTIVE OFFICER

[REDACTED]
[REDACTED]

E-MAIL: [REDACTED]
Website: [REDACTED]

05 December 2023

PHS Consulting
P O Box 1752
HERMANUS
7200

Per E-mail: amanda@phsconsulting.co.za

Dear Ms. Amanda Fritz-Whyte

**LETTER OF OBJECTION
PROPOSED EXPANSION OF FISANTEKRAAL AIRFIELD (AKA CAPE WINELANDS AIRFIELD)
DEADP REF NO 16/3/3/6/7/2/A5/20/2209/23 AND
DWS REF NO WU33620**

Further to your formal/advertised notification for the Scoping/EIA process and the associated Public Participation Process, relating to the various activities listed to facilitate a phased development to increase the existing Fisantekraal Airfield (aka CWA) and develop a runway with orientation 01-19 and a length of 3.5kms and the initial retention and refurbishment of a secondary cross runway with an orientation of 14-32 and length of 700m; with a phased supporting landside and airside infrastructure development, based on market demand, Garden Cities wish to:

- Register as an I&AP
- Lodge a formal objection based on the following reasons and concerns

Historical background and associated concerns:

Our initial concerns are linked to the formalization of the airstrip's zoning and possible impacts same posed, as a direct result of this process and was based on both the process followed prior to the decision, as well as the implications of the decision on Garden Cities, our landholdings and our Greenville Development.

.../2

ENQUIRIES: Mr R Smith

REFERENCE: Fisantekraal Airfield (DEADP REF NO 16/3/3/6/7/2/A5/20/2209/23)
RS/ldt

DIRECTORS: S S STUTTAFORD (CHAIRMAN) P D A BAIRNSFATHER CLOETE V A CHRISTIAN M FEBRUARY (Mrs) P J HEEGER J ISAACS
T E MAFATLE R A MARSH E R STUTTAFORD M D STUTTAFORD J E WHITE

CHIEF EXECUTIVE OFFICER : J W MATTHEWS

COMPANY SECRETARY : K MILAN

The City of Cape Town's Municipal Planning Tribunal had granted the rezoning and consent approval. The reasons provided for the approval, did not acknowledge the existence of Greenville Garden City, and nor did it acknowledge the situation whereby the future development of the airport may have significant impacts on the development rights of Greenville Garden City and the current and future landowners of this large-scale, integrated, mixed use human settlement.

As we stated in our Objection letter, dated 6 August 2020 (attached for ease of reference), Garden Cities find it problematic that in the 22 page LUM motivation report for the Fisantekraal Airfield, there is NO mention of Greenville Garden City.

Garden Cities are the developers of Greenville Garden City and Erf 4 (this Erf alone constituting 384.6499 ha) Greenville Garden City is situated immediately to the south of the Fisantekraal Airfield.

The LUM motivation report also failed to mention the fact that Garden Cities have secured significant land use rights for Greenville Garden City. These land use rights were secured following a full environmental, heritage and town planning application process, and include:

- 14 652 residential opportunities (State-assisted, finance linked & market)
- 375 000sqm business GLA
- 352 000sqm industrial GLA.

Garden Cities are in the process of developing Greenville in a phased manner and have too date developed over 2,575 (as at Nov 2023) state-assisted houses. We have also developed Places of Worship, Educational Facilities, Clinis, Retail Facilities, etc..

It is concerning that the applicant for the Fisantekraal Airfield was either:

1. Not aware of Greenville Garden City and its development rights; which they have confirmed they were very much aware of Greenville's approved Conceptual Layout and, or
2. Chose to not include this important fact in the LUM application; knowing that it poses severe and restrictive limitations in terms of future residential, educational and other zoning uses.

In either of the above situations, we are of the opinion that this was a fundamental flaw in the LUM application and subsequent decision.

We also find it concerning that the City's decision letter, dated 12 November 2020, the 9 'reasons for decision' continues to ignore the existence of Greenville Garden City, with statements such as "*is not incompatible with surrounding agricultural land uses*". We would have thought that the points raised by Garden Cities in our objection letter would have been noted, discussed, and then adequately addressed as part of the 'reasons for decision'. In the absence of any reference to this issue, we find the City's decision letter to be flawed.

The planning for the Greenville Garden City landholdings took place over a number of years, in a joint manner together with the City of Cape Town. At this time, the City's position with regard to the Fisantekraal Airfield was as follows: "*... it can be expected that the land surrounding the airfield, in future be taken up by mainly residential uses. It is therefore concluded that the airfield should not remain in its present location, and any future applications relating to aviation uses should not be positively considered.*"(Draft Northern District Plan (August 2009).

The draft Cape Town Spatial Development Framework (August 2009) stated that: "*All general aviation from Fisantekraal should be relocated to Atlantis.*"

3.

The approved Northern District Plan (October 2012) went further to state: "The land use rights for the airfield to operate has however lapsed ... (and) that provision needs to be made elsewhere for such a facility."

This clear and unequivocal planning and policy context facilitated the land use layout for Greenville Garden City and was one of the imperatives for the development being approved by the Western Cape Government's Department of Environmental Affairs and Development Planning in December 2012. A copy of the Approval letter and Conceptual Layout is attached.

Garden Cities are of the opinion that any decision which confirms land use rights for the Fisantekraal airfield has the potential to impact extremely negatively on the approved land use rights that have been granted for Greenville Garden City.

We find it disingenuous that the Greenville Conceptual Plan is referenced (App-23-CWA-Spatial-Planning-and-land-use-status, page 28) as lapsed plan; however in our mind the status of this plan is very much intact and merely implies that the rezoning is attended too as well when the LUM application is submitted to undertake the required subdivision of each future Phase of the development. The Concept Plan; Urban Edge; Agricultural Land (Act 70 of 70); the District Plan, Urban Development Designation and basket of rights cannot lapse, as this plan was approved by various authorities including the Western Cape Government, National Department of Agriculture and the City of Cape Town as an all-encompassing project.

Extract (App-23-CWA-Spatial-Planning-and-land-use-status, page 28):

This very large new town is conceptualised to be developed in phases and the first phases have been implemented, infrastructure and top structures developed starting on the eastern side with its Phase 1.

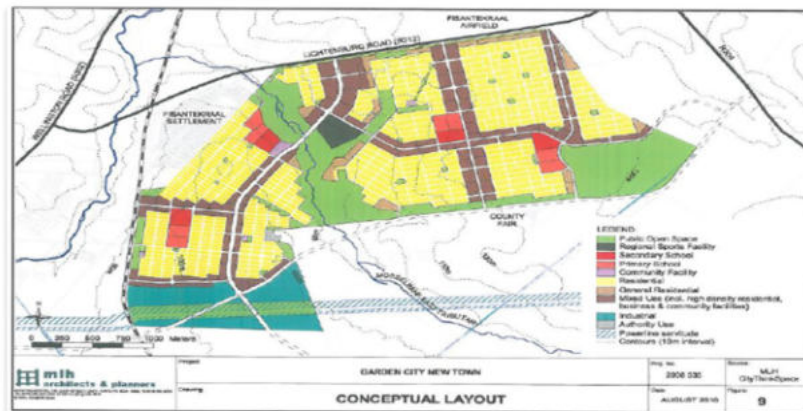


Fig. 17. Conceptual Layout Greenville
MLH architects and planners dated August 2010.
(source: Zoning Scheme Extract issued by City of Cape Town on 07 June 2022)

Erf 4, approximately 384 ha in extent, is directly to the south of Cape Winelands Airport, only separated by Lichtenberg Road (see Fig. 14). The 2010 Conceptual Layout envisaged Mixed Use (including high density residential, business and community facilities), residential, schools and open space.

As set out in the section under Existing Zoning, the Zoning Scheme Extract issued by City of Cape Town on 07 June 2022, states that Erf 4 Greenville is zoned as "AGRICULTURAL ZONE (AG)" and further notes that:

"The rezoning of Erf 4, Greenville Garden City, issued under cover of the enclosed letter dated 3 December 2012, has lapsed. No submission has been made for the subdivision of Erf 4 within the 5-year time period allowed."

And in any event, this land use management decision was limited to the existing airfield and runways and not the currently envisaged regional airport.

Feedback relating to various Reports:

CWA Initial Comments

1. Airport Access, traffic congestion and infrastructure constrains

1.1 Should access from *Lichtenburg Road (R312 / MR213)* be considered, the following need to be noted and considered by the applicant:

- No infrastructure such as streetlights, traffic signals or sidewalks on Lichtenburg Road.
- Current state of Lichtenburg Road and how it will be impacted during construction and operational phase.
- Small bridge over the eastern tributary of the Mosselbank (at Braam's farm) will have to be upgraded to make allowance for increased traffic.
- There is a lot of foot traffic on Lichtenburg Road as majority of the community members walk to their workplace. Side walks/ walking amenities will need to be incorporated into road design.
- Increased taxis in the area transporting staff will add stress to the current taxi routes.
- Stray cattle from informal farmers are a concern on Lichtenburg road. There have been a few accidents involving cattle on that road.
- NOTE: It is likely that Province may require that road widening be implemented on the CWA property to accommodate long-term traffic volumes.

1.2 *Access from Klipheuwel Road (R302 / MR188)*

- No infrastructure such as streetlights, traffic signals or sidewalks on Klipheuwel road.
- Very dangerous road with multiple accidents:
 - <https://www.iol.co.za/capeargus/news/two-die-and-another-injured-in-industrial-accident-at-a-klipheuwel-farm-94aa63a5-08e3-4a6d-a02e-1a150bbb53ed>
 - <https://www.news24.com/news24/southafrica/news/newly-engaged-cape-town-couple-and-their-daughter-3-die-in-head-on-collision-20211129>
 - <https://www.arrivealive.mobi/news.aspx?i=63772&s=1&page=13-injured-in-a-taxi-rollover-crash-on-the-n1-at-engen-klipheuwel>
 - <https://www.arrivealive.mobi/news.aspx?i=55956&s=1&page=two-injured-in-a-road-crash-in-klipheuwel>

1.3 *R312 and R304 Intersection*

- No infrastructure such as streetlights, traffic signals or sidewalks on Klipheuwel road.
- Very dangerous road with multiple accidents:
 - <https://www.dailyvoice.co.za/news/three-year-old-girl-dies-after-car-disobeys-stop-sign-11539830>

With the upgrade of the airstrip, it's important to consider the safety of not only your clients but also the safety of the current residents and future residents of Greenville Garden City and surrounds.

2. Electricity Supply

2.1 The use of renewable resources is always encouraged and a good solution to the energy crises.

2.2 Biodigesters on the other hand has a host of other concerns such as

- Produces odorous gases such as hydrogen sulphide and ammonia.
- Water demands and potential runoff of polluted water.
- Noise from pumps and generators.
- Transport of Feedstock (additional strain on roads)

2.3 Bulk fuel storage

- Bulk fuel storage facilities should have robust spill containment systems to prevent fuel spills from reaching the surrounding environment.
- Facilities must have well-defined spill response plans in place, including the availability of appropriate spill response equipment and trained personnel to minimize the impact of any spills that may occur.
- Leak detection - Regular monitoring and maintenance of storage tanks and associated piping can help identify potential issues before they escalate.
- Soil contamination due to leaks and how it will impact the identified wetlands.
- Air emission – designs need to incorporate venting systems to reduce harmful vapours into the atmosphere.
- Maintain accurate records of fuel storage, handling, and disposal activities to demonstrate compliance with environmental regulations.

3. Water Supply

3.1 Borehole development

“Strategy for water supply entails a phased approach using ground water as a supply source in the short term up until municipal infrastructure can either supplement the groundwater supply or in the case of the Muldersvlei line be the sole source of supply. ”

- How long is the short term for solely using borehole water for such as big facility, considering that most of the farms surrounding the airstrip is reliant on borehole water and no plans for aquifer recharge and the sustainability of surrounding boreholes?
- Construction activities may lead to soil erosion and sedimentation in nearby water bodies, affecting water quality and aquatic ecosystems.
- Increased water demand for construction and operational needs may strain local water resources, impacting both human and ecological requirements.

4. Sewage Management and Treatment

- Fisantekraal WWTW is already under immense stress to the growing population in Fisantekraal and Greenville and Bella Riva’s construction must also be taken cognisance of. The pump station would not be able to handle the capacity, especially as it’s not functional during loadshedding and causes sewer lines and manholes to overflow and spill into local rivers.
- Considering the above, Option 2 with on-site treatment is preferred.

5. Security and social issues

- Fisantekraal is already a high crime area with very limited policing resources and the increase in local crime is a concern.

- Taxi's violence, strikes and protests is prevalent in the area. How will the applicant deal with these social pressures as major roads to the airport will be impacted.
 - <https://24hournews.co.za/please-note-protesting-on-r304-r312-the-alleged-reason-for-protesting/>
 - <https://ewn.co.za/2019/06/13/city-meets-with-fisantekraal-residents-after-protest>
 - <https://www.groundup.org.za/article/fisantekraal-residents-want-build-their-own-homes/>
 - <https://www.news24.com/news24/southafrica/news/lives-of-poor-and-working-class-people-upended-by-violent-taxi-strike-20230804>
 - <https://www.thesouthafrican.com/news/durbanville-protests-why-cape-town-traffic-latest-13-june/>

6. Noise Pollution

- Currently the Greenville area is quite peaceful in terms of noise pollution, especially when standing at the Mosselbank River. Small aircraft can be heard once and a while.
- Construction activities and ongoing air traffic will contribute to elevated noise levels, disrupting the peace and tranquillity of surrounding Greenville community.
- Increased noise can have adverse effects on the well-being of residents, leading to sleep disturbances and other health issues.
- Increased noise levels will have a negative impact on property values and house sales as residents would not want to invest in areas with high noise and traffic areas, impacting Garden Cities financially, but also our main objective of providing housing to low-income families.

7. Air Quality and Emissions:

- Construction activities release dust and particulate matter, degrading air quality and posing health risks to residents.
- Aircraft emissions, including pollutants like nitrogen oxides, can contribute to air pollution, potentially causing respiratory problems and other health issues.
- Increased air pollution levels will have a negative impact on property values and house sales as residents would not want to invest in areas with high pollution levels, impacting Garden Cities financially, but also our main objective of providing housing to low-income families.

8. CWA Valley-Bottom Wetlands and Ecology

We do not agree with wetland offsetting approach as Garden Cities had to earmark hectares of valuable housing property to be retained for conservation. As developers we had to alter our plans and incorporated wetlands and areas of ecological importance, and the applicant should be evaluated against the same standards. Some of the key problems with offsetting is:

- *Net Loss vs. No Net Loss* – There is scepticism about whether biodiversity offsetting truly achieves "no net loss" of biodiversity. Some argue that the replacement of lost biodiversity may not be equivalent in terms of ecological value and function.
- *Site Selection and Equivalency* - Selecting appropriate offset sites that are ecologically equivalent to the impacted site can be challenging. Ensuring that the offset compensates adequately for the loss is a complex task and requires thorough assessment.

- *Time Lag* - Biodiversity offset projects often take time to establish and mature. There may be a time lag between the impact and the realization of the offset benefits, during which the affected biodiversity is not adequately protected.
- *Permanence* - There are doubts about the permanence of offset projects. If the offset measures fail or are not maintained in the long term, the intended benefits may not be sustained.
- *Additionality* - is concern that some offset projects may not represent true "additional" conservation efforts. If the offset activities would have occurred anyway without the development project, the offset may not be providing genuine conservation gains.
- *Monitoring and Enforcement* - Effective monitoring and enforcement mechanisms are crucial for the success of biodiversity offsetting. In some cases, these mechanisms may be lacking, leading to uncertainties about the success of offset projects.
- *Cumulative Impacts* - Biodiversity offsetting often deals with individual projects, but there is a concern that the cumulative impacts of multiple developments in an area may not be adequately addressed through offsetting measures.
- *Lack of Standardization* - There is a lack of standardized methodologies for assessing biodiversity impacts and determining offset requirements. This lack of consistency can lead to varying degrees of success and accountability.
- *Financial Assurance* - Ensuring that sufficient financial resources are allocated for the establishment and maintenance of offset projects is essential. Without proper funding, the long-term success of biodiversity offsetting may be compromised.

Furthermore, the construction and operation of a new airport in proximity to wetlands can have significant and potentially detrimental impacts on these sensitive ecosystems.

- Wetlands are often rich in biodiversity and provide habitat for a variety of plant and animal species. The construction of an airport can result in the direct loss of wetland habitat, leading to the displacement or loss of species that depend on these environments.
- The alteration of land for airport construction can disrupt natural hydrological patterns, affecting water flow and potentially leading to changes in wetland water levels.
- Runoff from the airport, containing pollutants such as sediment, oil, and chemicals, may degrade the water quality of nearby wetlands, impacting aquatic ecosystems.
- Airports typically have extensive impervious surfaces such as runways, taxiways, and parking lots, which can increase surface runoff during rainfall events. This can lead to increased sedimentation and nutrient loading in wetland areas.
- Aircraft operations and associated infrastructure can introduce noise and disturbance, affecting the behavior and reproductive success of wildlife in wetland areas.
- Some species, particularly those sensitive to human disturbance, may be displaced or experience stress due to the increased human activity associated with airport operations.
- Construction activities and increased human presence associated with the airport can facilitate the introduction of invasive plant and animal species to wetlands, outcompeting native species and altering ecosystem dynamics.
- Wetlands play a crucial role in climate regulation, sequestering carbon and providing resilience against extreme weather events. The alteration and disturbance caused by airport construction can compromise the ability of wetlands to adapt to climate change.

9. Garden Cities Conservation Areas

Although not noted in the applicants reports, it is important to note that Garden Cities has several core conservation areas on their landholding.

- Eastern Tributary of the Mosselbank River
- Seep Wetlands
- Depression Wetlands
- Terrestrial Corridor

10. Airport development and Livestock farming

Garden Cities has active tenants on its landholdings which actively farms with livestock and particularly cattle and we are concerned about the following impacts:

- *Noise Disturbance* - Construction and ongoing airfield activities will generate elevated noise levels, which may stress livestock. Noise-related stress can affect animal behaviour, feeding patterns, and overall well-being.
- *Animal Behaviour and Productivity* - Livestock, particularly sensitive species like poultry and dairy cattle, may be negatively affected by changes in their environment. This can result in altered behaviour, reduced reproductive success, and changes in milk or egg production.
- *Dust and Air Quality* - Construction activities can contribute to the generation of dust, affecting air quality in the vicinity of the airfield. Dust exposure can lead to respiratory issues in livestock, impacting their health and productivity.
- *Traffic and Access Issues* - Increased vehicular traffic associated with the airfield, including construction-related vehicles and airport staff commuting, will create traffic congestion at the entrance to our farms. This may pose challenges for transporting livestock and accessing farming facilities.
- *Water Resource Concerns* - Construction activities and increased human presence can lead to changes in water runoff patterns, as well as increased demand for borehole water, potentially affecting water sources for livestock. Changes in water quality or availability can impact the health of the animals.
- *Biosecurity Risks* - The introduction of new infrastructure and people associated with the airfield can pose biosecurity risks to livestock farms. Increased human traffic may increase the likelihood of introducing diseases to the farm.
- *Visual and Aesthetic Impact* - Changes in the visual landscape due to the construction and presence of the airfield may have psychological effects on both livestock and farm workers. Visual disturbances can contribute to stress in animals.

Over-Arching Garden Cities concerns affecting our Greenville landholdings and its existing rights.

1. Noise Cones

- a. NOTE: Despite requesting access to this critical information on a number of occasions, Garden Cities, have not received it, this information playing a pivotal role in the decision making process.
- b. The noise cones are of huge concern and impacts vast extents of our landholdings in terms of:
 - i. Land already forming part of the Greenville approval with existing rights in place.
 - ii. Future landholdings; which was acquired for future growth of Greenville; which is now also impacted on in terms of various land uses.
- c. The extents of noise cones results in various land uses which can no longer be considered and single residential, incremental housing, general residential housing in its various forms, community facilities (such as educational/schools, etc.) and others will be impacted and rendered sterile within these limiting noise cone zones. This resulting in a monotonous and singular type of development of industrial and commercial entities, not catering for a true mixed-use development and not taking into account the 'live, work & play' approach and most definitely not relating to the densification approach of the City of Cape Town's, Densification Policy, Transit Orientated Development Policy and the overall MSDF (Metropolitan Spatial Development Framework) & DSDF (District Spatial Development Framework) recently updated and adopted by the City of Cape Town (January 2023).
- d. Garden Cities as a 104-year young established development company has also taken the approach of developing social and community orientated developments; catering for all spheres of land uses and people to ensure community cohesion, creating a sense of being. The further development of Greenville will hugely impacted on by this proposed upgrade of the Fisantekraal Airstrip will not allow for the full development of a mixed use development as planned and anticipated, but rather lends itself towards the old traditional development of low cost housing developments dumped adjacent to an array of industrial development.
- e. Industrial developments will take years to develop; or at least for the take-up of the quantum of industrial development that will be the resultant of the limited land uses as a resultant of the proposed CWA and its associated noise cones and other limitations and less desirable residential land-uses.

2. Noise Cones resulting in main land use being industrial in nature.

- a. Based on our engagements with Cape Winelands Aero, it is clear that the developer acknowledges the limitations as a direct result of the anticipated noise cones; but feel comfortable in alluding to the fact that 'Garden Cities' landholdings' will only increase in value; however
 - i. Garden Cities is not concerned in the increase of land value as our main ethos and mission statement is that of providing affordable housing for the wider sphere of people and not that of chasing profits and maximizing land values.

- ii. We have also researched the take-up of industrial land in close proximity to Lanseria (after 49 years) & CTI (Cape Town International, after 69 years) and in both these instances limited industrial development has occurred with Lanseria having approximately 82 ha being depicted; of which not all the land is even
- iii. being utilized and CTI depicting approximately 80ha (Airport City), 105ha (Boquinar Industrial) and another 86 ha (Industrial featuring), the latter total of 271 ha, not even totally developed and a large portion not airport related, but merely created due to its original location, adjacent to the N2.
- iv. In terms of the CWA, the following should also be noted regarding industrial land:
 - 1. Existing industrial areas in close proximity to Fisantekraal (Fisantekraal Industrial Park) and others which to date have shown no to little development interest.
 - 2. Greenville's existing industrial area in future Phase 4, under the powerline and being the most suitable location for same.
 - 3. CWA's various acquisition of land parcels; of which only a small portion will be utilized for the actual proposed airport, the remainder all being earmarked for future industrial uses.
 - 4. Greenville's future phases which would have to consider industrial land, as a only potential and viable land use as a direct result of the proposed airport, yet again, delivering further industrial land.
 - 5. All of the above industrial land resulting in massive stagnation of any residential opportunities in this part of the land and over catering for industrial land of which the take-up would take many many years to materialize into any real opportunities.
 - 6. We have serious concerns and reservations as to the viability and suitability of the extensive industrial land created as a direct result of the proposed airport; the City and Province, then yet again, not delivering on the housing shortage that was anticipated and approved in terms of the Greenville development.
- 3. Further threats such as noise pollution and height restrictions in a similar way curtail the original development and anticipated land uses even further, rendering vast tracks of previously approved land sterile.
- 4. The realization of the CWA would also pose substantial impacts on the provision of bulk infrastructure and more so the bulk infrastructure which was planned and gradually rolled out to cater for Greenville and its mixed land use approach, the bulk potentially being taken up by the bulk requirements suggested by the CWA development and clarity will have to be obtained and clearly addressed in terms of bulk water, sewerage, stormwater and road infrastructure, as well as bulk electrical requirements; the latter than issue that Garden Cities has very hard and invested mass amounts of funding to ensure that future bulk electrical infrastructure and supply would be available.

5. Decreasing of land values in existing developments and areas with newly created flights paths and loss of tranquillity of the area.

We are extremely concerned regarding the proposed CWA and the resultant impacts it will have on Greenville Garden City, and the layout that has been endorsed by the relevant authorities as part of the 10-year authorization process. The location of this airport is unsuitable in its present location and would strongly believe that other alternative locations should be considered as a more suitable and less invasive solution to the existing landscape, existing in-hand approvals and surrounding land-uses.

Thank you,

Garden Cities NPC (RF)

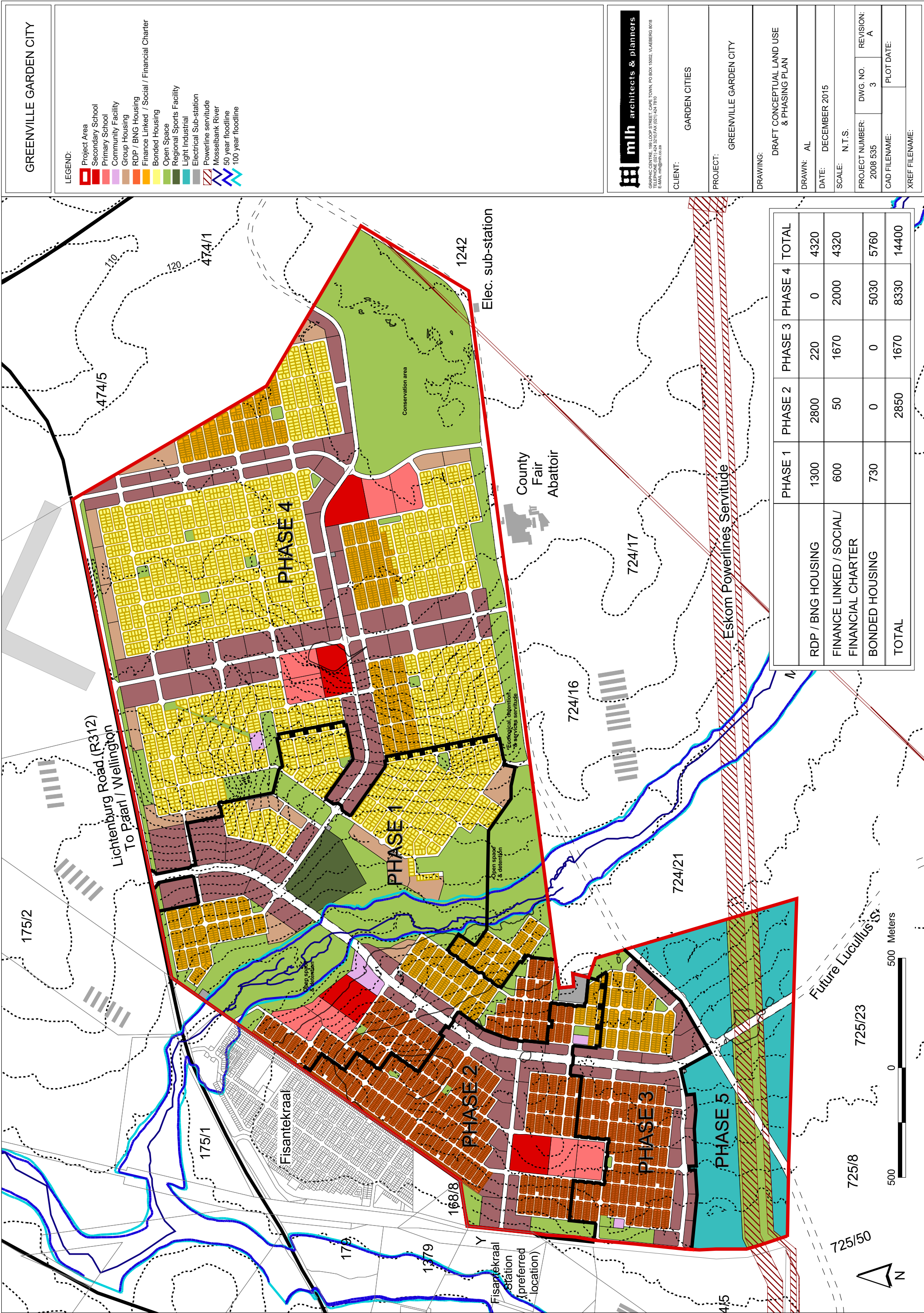
Encl.

- Copy of Garden City's letter of objection (Dated 6 August 2020)
- Copy of Garden City's letter of appeal (Dated 18 November 2020)
- Western Cape Government's Department of Environmental Affairs and Development Planning approval letter dated December 2012.
- Greenville Conceptual Plan
- Available CTI Noise Cones superimposed, to obtain and gain access to potential impacts.
- SANS10103 Extract – Noise
- Letter from Anton Bredell – Reverberating our concerns regarding noise cones.

Yours faithfully



GARDEN CITIES



	PHASE 1	PHASE 2	PHASE 3	PHASE 4	TOTAL
RDP / BNG HOUSING	1300	2800	220	0	4320
FINANCE LINKED / SOCIAL/ FINANCIAL CHARTER	600	50	1670	2000	4320
BONDED HOUSING	730	0	0	5030	5760
TOTAL		2850	1670	8330	14400



Project

Review of Noise Impact Assessment Report
for Cape Winelands Airport Expansion
October 2024

Prepared for

Garden Cities NPC (RF)
50 Louis Thibault Drive
Edgemead
Cape Town

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P1	2024/11/28	Draft version for comment	
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For and on behalf of

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Executive Summary

This report reviews the report *Noise Impact Assessment For The Proposed Cape Winelands Airport Expansion* by Demos Dracoulides of DDA Environmental Engineers dated 15 October 2024.

The reviewed noise impact assessment has numerous errors and omissions:

- Basic acoustic calculation methods are incorrect (Table 3-3)
- No noise monitoring has been done (or reported) in the primary study zone under the proposed flight path in the Greenville City residential area. Noise monitoring was done at a non-typical time (the 2022 Easter weekend) but this was not explicitly reported.
- The “No-Go” scenario imagines an airfield completely different to the current airfield, with significantly more flights, including the use of two runways that are currently unmarked and derelict, one of which has a go-kart track or similar on it.
- A meaningless scenario of the first year of operation is included for no clear reason. The assessment is for the full operation of the airport.
- For the fully operational scenario, no large aircraft such as the Airbus A380 are included in the noise model despite claims in press releases that the runway is specifically designed to cater for these aircraft.
 - The longer rolling distance of the A380 compared to the Boeing 737 means that the aircraft will be significantly lower when passing over the land to the south, increasing noise levels in the area.
- The assessment states that noise levels in the fully operational scenario will be lower than the imagined “No-Go” scenario, but then shows this statement to be false in its own noise contour plots.
 - The assessment also disingenuously compares the number of operations between scenarios, where in the “No-Go” scenario the operations are all light aircraft while in the fully operational scenario there are 52 new large aircraft operations per day.
- The procedure set out in the Western Cape Noise Control Regulations, 2013 is not followed as the assessment recommends a report investigating mitigations is started before the airport reaches full capacity. Regulation 4 states that all mitigation methods are to be submitted to the local authority before approval is granted.
- The assessment gives a list of unproven, untested, and unassessed vague noise mitigation methods. None of the mitigation methods is shown to give any noise reduction, and yet the noise impact rating’s significance is inexplicably reduced from HIGH to MEDIUM.

Notwithstanding the queries over the aircraft used in the noise model, the assessment still highlights the following significant impacts on the Greenville Garden City residential zone:

- A large area is exposed to average noise levels above the district rating level with no proposed effective mitigation measures to reduce the noise levels to comply with the district rating level.
- A large area is exposed to noise events above 70 dBA over 50 times per day. This noise level has a severe impact on the suburban area and is not permitted by local regulations:

- 70 dBA is 20 dBA above the daytime district rating level. SANS 10103 states “Vigorous community or group action” can be expected for noise levels 15 dBA above the rating level.
- 70 dBA is 13 dBA above the noise limit for a disturbing noise as defined by the Western Cape Noise Control Regulations, 2013. The regulations state that “A person may not allow a disturbing noise to be caused”.
- Australian Standard AS2021-2015 states that 70 dBA will likely “interfere with conversation”. This is a significant negative impact for residents and for learners in the schools.
- The assessment concludes that residential and school use is “incompatible” with the proposed airport land use.

It is clear that the proposed airport will have a HIGH, negative impact on the existing and future suburban land uses to the south, against which no realistic or meaningful mitigation has been proposed or is likely available to be imposed.

Based on the findings of the assessment, it is clear that the only feasible mitigation measure is to move the runway a distance to the north so that the significant noise impacts are largely located on the airport landholding.

The assessment therefore does not adequately assess the impact of noise from the proposed development on the Greenville Garden City property. The application must be rejected on grounds of noise impact on the Greenville Garden City.



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1.0 Introduction

Garden Cities NPC (RF) has appointed Sound Research Laboratories South Africa (Pty) Ltd to review the report *Noise Impact Assessment For The Proposed Cape Winelands Airport Expansion* by Demos Dracoulides of DDA Environmental Engineers dated 15 October 2024.

The report claims to assess the noise impact of the proposed commercial airport (Cape Winelands Airport) on the airfield previously known as Fisantekraal Airfield. The report includes residual noise measurements of the site and surroundings (though not in the proposed flight path), and modelled noise levels on the surrounding areas using the Aviation Environmental Design Tool (AEDT) from the US Federal Aviation Administration (FAA). The report sets out impractical and vague measures for noise mitigation but does not consider moving the runway as one of the primary and most effective noise mitigation options.

This report reviews the approach to the assessment and the content of the assessment.

2.0 Assessment Criteria

The assessment sets out a range of criteria and codes:

- SANS 10117: *Calculation and prediction of aircraft noise around airports for land use purposes*
- SANS 10103: *The measurement and rating of environmental noise with respect to annoyance and to speech communication*
- SANS 10328: *Methods for environmental noise impact assessments*
- Australian Standard AS2021-2015: *Acoustics – Aircraft noise intrusion – Building siting and construction*
- WHO guidelines (1999, 2009)
- International Finance Corporation (IFC) 2007 *Environmental, Health, and Safety (EHS) Guidelines*
- Western Cape Noise Control Regulations, 2013

These standards, guidelines, and regulations set a range of guidelines for environmental noise generally and for aircraft noise.

The local applicable regulations are the Western Cape Noise Control Regulations, 2013. These regulations require that for land use applications, the applicant must submit:

a noise impact assessment in accordance with SANS 10328 to establish whether the noise impact rating of the proposed land use or activity exceeds the appropriate rating level for a particular district as indicated in SANS 10103

The report under review likely serves as this noise impact assessment.

The regulations state that where the assessment shows that the rating level will likely be exceeded:

- (a) the applicant must provide a noise management plan, clearly specifying appropriate mitigation measures to the satisfaction of the local authority, before the application is decided; and

- (b) implementation of those mitigation measures may be imposed as a condition of approval of the application.

Note that this requires that the noise management plan with “appropriate mitigation measures to the satisfaction of the local authority” must be provided “before the application is decided”.

The assessed district in Greenville Garden City is “b) Suburban district with little road traffic” with outdoor rating levels of daytime $L_{Req,d}$ 50 dBA, night-time $L_{Req,n}$ 40 dBA, and day-night $L_{Req,dn}$ of 50 dBA.

A noise management plan is therefore required by the Regulations if the noise level exceeds $L_{Req,dn}$ 50 dBA. Notably, the Day-Night noise rating plot in Figure 4-12 of the report does not show the 50–55 dBA contour but instead starts at 55 dBA. Is this to show a smaller affected area and reduce the perceived impact of the airport on the surrounding areas?

The Regulations define a disturbing noise as a noise that “exceeds the rating level by 7 dBA”. For daytime, this means a disturbing noise is a noise level that exceeds L_{Req} 57 dBA.

The Australian Standard AS2021-2015 uses a metric Noise Above 70 dBA (N70) to assess the noise impact on a community as noise levels above this are likely to “interfere with conversation or with listening to the radio or the television”. This would clearly disrupt both domestic and educational land uses.

Regarding community response to noise levels, SANS 10103 includes a table estimating community response to noise.

According to the Western Cape Noise Control Regulations, 2013 and SANS 10103, a noise event above 70 dBA would:

- Exceed the threshold for a daytime disturbing noise by at least 13 dBA
 - The noise would therefore be classified as a disturbing noise
 - The regulations state “2. A person may not allow a disturbing noise to be caused”
- Exceed the district rating level by at least 20 dBA
 - This is a higher excess than 15 dBA, therefore the response category is “Very strong” described as “Vigorous community or group action”.

It is therefore clear that according to the Western Cape Noise Control Regulations, 2013:

- 1) For noise levels above 50 dBA
 - a) The applicant must submit a noise management plan to the local authority showing how this noise will be controlled
- 2) For noise levels above 70 dBA
 - a) A disturbing noise is quite clearly created
 - b) Disturbing noises are prohibited by the regulations
 - c) “Vigorous community or group action” can be expected.

Table 5 — Categories of community or group response

1	2	3
Excess ($\Delta L_{Req,T}$) ^a dBA	Estimated community or group response	
	Category	Description
0 to 10	Little	Sporadic complaints
5 to 15	Medium	Widespread complaints
10 to 20	Strong	Threats of community or group action
>15	Very strong	Vigorous community or group action

NOTE Overlapping ranges for the excess values are given because a spread in the community reaction might be anticipated.

^a $\Delta L_{Req,T}$ should be calculated from the appropriate of the following:

- 1) $\Delta L_{Req,T}$ = $L_{Req,T}$ of ambient noise under investigation MINUS $L_{Req,T}$ of the residual noise (determined in the absence of the specific noise under investigation);
- 2) $\Delta L_{Req,T}$ = $L_{Req,T}$ of ambient noise under investigation MINUS the maximum rating level for the ambient noise given in table 1;
- 3) $\Delta L_{Req,T}$ = $L_{Req,T}$ of ambient noise under investigation MINUS the typical rating level for the applicable district as determined from table 2; or
- 4) $\Delta L_{Req,T}$ = Expected increase in $L_{Req,T}$ of ambient noise in an area because of a proposed development under investigation.

Figure 2.1: Table 5 from SANS 10103:2008

3.0 Assessment Methodology

The report models predicted noise levels from 3 proposed scenarios. Day/night $L_{R,dn}$ noise levels are predicted, as well as the occurrence of noise levels above 70 dBA (N70).

Three scenarios are proposed:

- 1) A “No Go” scenario described as the condition if the proposed new airfield does not go ahead
- 2) The new development in its first year
- 3) The new development at expected operating capacity

3.1 “No Go” scenario

This scenario is described in contradictory terms through the report:

- “Existing runways at full capacity” (page 1-12)
 - Refers to four “existing runways” and a “typical busy day”
 - It must be noted that two of the four runways are in fact currently not in use. One has a go-kart track or similar built on it.
 - A “typical busy day” currently most likely involves the use of light aircraft on two runways and go-karts on a third.
- “Existing operations at full capacity” (page 4-17)

- “It is expected that these noise levels would be reached if the proposed new runway does not go ahead” (page 4-20)

This “full capacity” number of flights is predicted in Table 4-5 (included as Figure 3.1) as a suspiciously round number of operations (100 arrivals + 101 circuits + 100 departures = 301). I note that Table 4-5 is included twice; once with and once without figures for the “DASH 6/PT6A-27 RAISBECK QUIET PROP MOD”.

This level of activity is completely different from the actual current use of the airfield. Two of the four runways are not in use, with a go-kart track on one of the runways (Figure 3.2).

The current airfield is in fact barely used. The noise survey data for the area bears this out. The noise monitoring position MP01 on the airfield measured a noise level of L_{Aeq} 54 dBA on two days. This is not consistent with a busy airfield. On page 3-4, measurement position MP01 is described as follows: “Currently at MP01, the main noise sources are the limited light aircraft flights, occasional vehicular traffic, nature sounds and limited human activities.”

The proposed “current scenario” is not the current scenario. It is an imagined “maximum possible capacity” scenario to attempt to inflate the current usage and therefore “possible noise levels” compared to which the increase to a full commercial airport would not seem as large an increase.

The fact is that based on current usage and noise survey data, the current airfield is a quiet area, with measured noise levels far below the imagined “No-Go” scenario.

Table 4-5 Current Runway System at Full Utilisation (Scenario 1)

Aircraft ID	Aircraft Model	Operations			
		Runway 01-19, 32-14, 05-23			
		Arr.	Circ.	Dep.	Total
C172	CESSNA 172R	100	0	100	157
DHC6QP	DASH 6/PT6A-27 RAISBECK QUIET PROP MOD	0	0	0	43
P28A	PIPER WARRIOR PA-28-161	0	101	0	101
Grand Total (24-hour)		100	101	100	301

DDA

4-4

October 2024

Noise Impact Assessment for the Proposed Cape Winelands Airport Expansion

Aircraft ID	Aircraft Model	Operations			
		Runway 03-21			
		Arr.	Circ.	Dep.	Total
C172	CESSNA 172R	78	0	79	157
DHC6QP	DASH 6/PT6A-27 RAISBECK QUIET PROP MOD	22	0	21	43
P28A	PIPER WARRIOR PA-28-161	0	101	0	101
Grand Total (24-hour)		100	101	100	301

Circuit: Training flights

Figure 3.1: Predicted number of operations at the existing airfield



Figure 3.2: Current airfield showing 2 runways in use and 2 derelict runways (one with go-kart track)

3.2 New development in its first year

This scenario has no relevance to the application. The application is for the fully developed airport. Noise levels in the first year are irrelevant.

3.3 New development at operating capacity

The development is modelled at full capacity assuming the following:

- 208 operations per day
 - 52 arrivals and departures are commercial aircraft (Airbus A330, Boeing 737-series, Boeing 777)
 - This is an increase from 0 to 52 over existing operations.
- No passenger flights between 22h00 and 06h00

- It must be noted that, not including for delayed flights:
 - Cape Town International Airport (CPT) typically has 5–7 passenger flight operations in this time
 - Lanseria Airport (HLA) typically has one departure and one arrival in this time
- No Airbus A380, A350, or Boeing 747 operations
 - The “large” aircraft modelled are Airbus A330, Boeing 737, Boeing 777
 - If these larger aircraft (especially the A380) are not modelled, does the application specifically state that the airport will not cater for or permit these large aircraft?
 - The runway is classified as a “Code F” runway at 3,500m to accommodate larger aircraft than CTIA, which has a shorter 3,200m runway.
 - Cape Winelands Aero press releases specifically name the A380 as an aircraft being accommodated (press release dated 2023/12/12, extract in Figure 3.3).
 - Larger aircraft such as the A380 have a longer roll and therefore are lower to the ground at the end of the runway. They are heavier and generally noisier. This results in higher noise levels on the ground. Excluding large aircraft from the model while advertising their use in the media is inconsistent and likely underestimates noise levels.

The modelled operations do not seem to match either the stated use of the airfield in the media, or the similar uses of the CTIA or HLA to which the airfield claims to be similar.



Cape Winelands Aero, Lichtenburg Road, R312, Durbanville
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12 DECEMBER 2023

FOR IMMEDIATE RELEASE

Exciting Announcement: Cape Winelands welcomes airport expansion.

...

Facts and Figures

- Main Runway - 3500m can accommodate (Boeing A380).

Figure 3.3: Extract from Cape Winelands Aero dated 2023/12/12 stating that the 3,500m runway is specifically designed to cater for the Airbus A380

4.0 Review of Content

Page I-11

The report identifies that Greenville Garden City will be a residential development.

development will be a mixed residential and lifestyle golf estate. The second is the Greenville Garden City development, which is located south of the CWA and the R312. The Greenville Garden City will be a residential development.

Figure I-1 labels all runways as if they are currently operational. Figure 3.2 in this report shows that only two are labelled and operational, with a go-kart track or similar on one runway.



Page I-12

The correct modelling tool is identified and used for the assessment: *Aviation Environmental Design Tool (AEDT) from the US Federal Aviation Administration (FAA)*.

Three operational scenarios are introduced. See comments in Section 3 of this report showing that Scenario 2 is irrelevant and that Scenarios 1 and 3 seem to use data for the modelling to elevate the impact of the No-Go Scenario 1 and downplays the impact of the fully operational facility (Scenario 3).

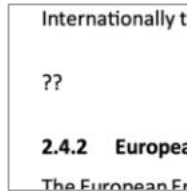
Page 2-4

N70 is identified as a noise level “likely to interfere with conversation” indoors.

The Australian Standard AS2021¹ specifies the single event level of 60 dB(A) as “the indoor design sound level for normal domestic areas in dwellings”, since this is the level at which “a noise event is likely to interfere with conversation or with listening to the radio or the television”. Given that a house

Page 2-7

Is the report complete? Was there a section to be completed or included?



Page 2-8

Regarding a noise nuisance, the Western Cape Noise Control Regulations, 2013 state “in so far as it is causes or is likely to cause a noise nuisance, a person may not...operate...aircraft...near a residential area”.

Aircraft from the proposed full commercial airfield would predominantly take off directly over the Greenville Garden City residential area. The end of the proposed new runway is approximately 600 metres from the Greenville Garden City residential area. Conservatively assuming a large aircraft takes off 1,000 metres from the end of the runway, then at a typical 3° departure angle the aircraft would be only 84 metres above the first houses. This is clearly an aircraft operating near a residential area.

Page 3-2

Why was no noise monitoring done (or if done then not reported) in the current or proposed scenario’s flight paths? These are critical positions for the noise study to assess but are instead carefully not addressed.

Page 3-3

Figure 3-1 has errors with the labelling and the key. There are no measurement positions in the key residential area under the proposed flight path.

Page 3-5

There are severe data processing errors and omissions in Table 3-3.

Overall noise levels in Table 3-3 were calculated incorrectly and measurement durations are omitted. Decibels work on a logarithmic scale so average noise levels must be calculated logarithmically (and scaled proportionately to each measurement duration). As this is a fundamental acoustic error it casts doubt on the credibility of the overall assessment.

For example, MP05 daytime noise levels are recorded as 39.0 and 43.5 dBA with the Overall stated as 41.2 dBA. This is (incorrectly) the arithmetic mean. The correct Overall should be 41.8 dBA. The difference between arithmetic and logarithmic means for two noise levels L_1 and L_2 are shown below.

$$L_{arithmetic} = \frac{L_1 + L_2}{2}$$

$$L_{logarithmic} = 10 \log \left(\frac{10^{L_1/10} + 10^{L_2/10}}{2} \right)$$



Figure 3-1. Ambient Noise Monitoring Locations

Figure 4.1: Noise monitoring positions show no measurements in the key residential area under the flight path. Labels and key are not shown correctly

Page 3-6

The noise monitoring in Fisantekraal was done on the 2022 Easter weekend, with MP04 on top of a local residence. The report mentions that the Sunday was notably loud but makes no mention of the weekend being Easter weekend. It does not mention that it might have been an unusual scenario of Easter Sunday festivities (17 April 2022). The whole weekend was quite possibly unusual noise monitoring conditions. This weekend should have been avoided for “typical” noise level measurements. If the survey had to be done on this weekend, then the reason(s) for this should be stated and the uncertainty of the data should be reported.

Page 4-1

Construction noise is likely not a noise impact for the development. Construction noise is limited to specific hours though there is not a local noise limit for construction noise.

BS 5228-1 (1984) is stated as used. Note that BS 5228-1:2009+A1:2014 is the current version of the standard.

Page 4-4

A “typical busy day” is presented as the very round number of $100+100+101=301$ operations. This is in stark contrast to the reports noise survey levels and observations of the site “the main noise sources are the limited light aircraft flights”. The split in aircraft identifies that the vast majority of landing and taking off operations (157 of 200) will specifically be Cessna 172R aircraft. Is this a true reflection of nearby airfields and the types of aircraft used?

Page 4-7

The assessment attempts to compare the fully operational airport activities to the imagined operational levels of the current derelict airfield by comparing the number of operations. By stating that the fully operational airport “peak general aviation traffic under Scenario 3 will not exceed the current maximum operational capacity of Scenario 1” the assessment incredibly misleadingly implies that the noise from a Cessna is the same as the noise from a Boeing 777. In reality, the actual difference between Scenario 1 and Scenario 3 is an increase from zero large aircraft operations to 52 large aircraft operations per day.

The air traffic in the opening year will depend on several factors, including the phased construction and rollout of general aviation hangar facilities, which are yet to be finalized. Initially, a rapid increase in general aviation traffic is anticipated as development aligns with market demand. This growth is expected to continue over time, eventually reaching the maximum traffic levels outlined in Scenario 3. However, the peak general aviation traffic under Scenario 3 will not exceed the current maximum operational capacity of Scenario 1, the No-Go Alternative.

The paragraph following this one (included below) is simply untrue and is disproved by the assessment. Noise levels from the “general aviation operations” will specifically NOT “always be lower than those with the existing operations at full capacity”. Figure 4-8 shows predicted noise levels for the supposed Scenario 1, while Figure 4-13 shows noise levels for the operational airport. Extracts are included in Figure 4.2 of this report, clearly showing that this claim is materially false.

As such, at any given moment in time after the opening year of the new runway, the noise levels due to the general aviation operations will always be lower than those with the existing operations at full capacity.

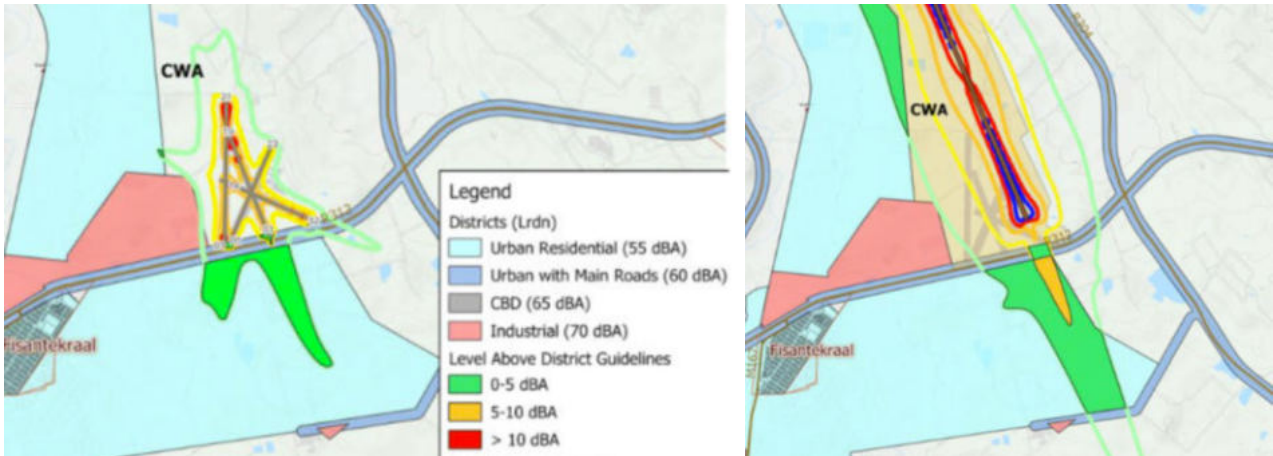


Figure 4.2: Scenario 1 noise levels (left) are clearly lower than Scenario 3 noise levels (right)

Page 4-8

Table 4-8 shows that the number of large aircraft is expected to be 52 per day. Note that the noisier Airbus A380—specifically advertised in the press as an aircraft to be catered for by the longer runway—is not included in this list. The Airbus A350 is also not included in the list, even though it is used in press releases regarding current aircraft landing at CPT.

Table 4-8 New Runway System at Full Utilisation (Scenario 3)

Aircraft ID	Aircraft Model	Full Capacity Operations			
		Runway 01-19			
		Arr.	Circ.	Dep.	Total
A330-3	Airbus A330-300 Series	1	0	1	2
B737-3	Boeing 737-300 Series	2	0	2	4
B737-4	Boeing 737-400 Series	1	0	0	1
B737-8	Boeing 737-800 Series	13	0	14	27
B777-2ER	Boeing 777-200-ER	9	0	9	18
CL601	Bombardier Challenger 601	1	0	1	2
CNA172	CESSNA 172R	27	0	22	49
DHC6-3	DeHavilland DHC-6-300 Twin Otter	12	0	12	24
DHC8Q-4	Bombardier de Havilland Dash 8 Q400	2	0	2	4
EMB120	Embraer EMB120 Brasilia	4	0	4	8
ERJ145	Embraer ERJ145	16	0	16	32
GULF4-SP	Gulfstream IV-SP	8	0	8	16
PA28	PIPER WARRIOR PA-28-161	0	21	0	21
Total (24-hour)		96	21	91	208

Page 4-11

The prevailing southeast wind means the noisier take-off operation is 61% of the time over the residential Greenville Garden City area.

Page 4-24

The assessment shows the day-night level L_{Rdn} with contours starting at 55 dBA and not at 50 dBA. The district noise level in SANS 10103 is L_{Rdn} 50 dBA for a suburban area with little road traffic. Why is the 50–55 dBA area not shown, since this is an area that exceeds the zone noise limits in SANS 10103.

Figure 4-13 shows a large area in the Greenville residential area will exceed the 50 dBA rating level by up to 10 dBA and an area that exceeds the rating level by over 10 dBA.

Page 4-25

As shown in Section 2, an N70 noise event is a noise level at least 20 dBA above the district daytime rating level. This meets the definition of a disturbing noise in the Western Cape Noise Control Regulations, 2013, and according to SANS 10103:2008 “Vigorous community or group action” can be expected. AS2021:2015 states that noise levels above 70 dBA are likely to “interfere with conversation”. This is clearly a disruptive noise event.

Figure 4-14 of the report (extract shown in Figure 4.3) shows that there are large areas in the Greenville Garden City residential area where more than 50 of these disruptive events are expected every single day. This is a severe impact on a residential area including education facilities and places of worship.

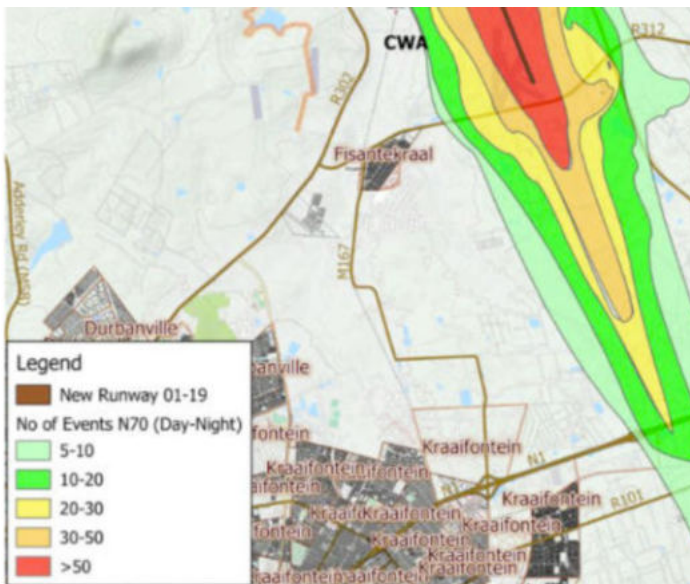


Figure 4.3: Number of events above 70 dBA is above 50 per day for a large area of the Greenville City residential area

Page 5-31

The recommendation for noise control measures is not according to the methods in the Western Cape Noise Control Regulations, 2013 and is therefore rejected. As set out in Section 2, Regulation 4 states that clear mitigation measures must be included in a noise management plan “before the application is decided”.

The report attempts to recommend that an investigation “should be initiated before the full capacity of the new runway is reached”.

The investigation of noise abatement operational procedures should be initiated before the full capacity of the new runway is reached, taking into account the recommended noise monitoring around the airport and noise modelling of the applicable mitigation measures.

Notwithstanding all comments in this review regarding the aircraft types modelled and the times of flights, the assessment still rates the impact significance as “HIGH” with “High” confidence (Table 5-4). The assessment claims that with mitigation the impact significance is reduced to “MEDIUM” with “High” confidence. The so-called mitigation measures will be addressed in turn.

Table 5-4. Operation Noise Impact Ratings: Scenario 3 (New Runway 01/19 at Full Capacity)

Noise	Extent	Intensity	Duration	Consequence	Probability	Significance	Status	Confidence
Without mitigation	Local 1	High 3	Long-term 3	High 7	Probable	HIGH	- ve	High
Noise	Extent	Intensity	Duration	Consequence	Probability	Significance	Status	Confidence
With mitigation	Local 1	Medium 2	Long-term 3	Medium 6	Probable	MEDIUM	- ve	High

Mitigation measures, pages 5-31 to 5-33

Mitigation 1: the assessment admits that the airport is not compatible with residential and educational uses “incompatible land use (such as houses and schools)”:

- Encourage airport compatible land-use planning via:
 - establishing compatible land use (such as industrial and commercial) to be located around airport facilities.
 - directing incompatible land use (such as houses and schools) away from the airport environs and the runway alignments;

Mitigation 2: no dB reduction figure is given for this vague suggestion of a tax on airlines for noise

- Provide incentives for airlines to obtain aircraft with the latest available noise reduction technology, through for example noise-related landing charges.

Mitigation 3: Any changes to the flight paths must be approved by the relevant authority and must be modelled to assess whether this yields any meaningful reduction in noise levels at the affected areas.

- Consider the use of specific take-off or approach procedures (such as Continuous Descent Operations, or steeper landing trajectories) to minimise and optimize the distribution of noise on the ground.

Mitigation 4: Any changes to the flight paths must be approved by the relevant authority and must be modelled to assess whether this yields any meaningful reduction in noise levels at the affected areas.

- Use noise preferential routes to assist aircraft in avoiding noise-sensitive areas, such as Klipheuwel, on departure and arrival, and the use of turns to direct aircraft away from noise-sensitive areas.

Mitigation 5: Feasibility of the mitigation not assessed “may be feasible”. An increase in glide-path angle only helps on approach, not on the 61% use case of take-off over the residential area. An increase of 0.2° is equivalent to an increase of 11 metres from 157 metres to 168 metres above ground level at 3 kilometres from landing. This is a negligible increase in distance.

- Consider approaches at slightly steeper angles. A small increase in the glide-path angle to 3.2°, rather than the standard 3.0°, may be feasible and offer scope for noise reduction.

Mitigation 6: Not a noise mitigation method. Telling residents when they will have a “HIGH” noise impact is not mitigation.

- Establish and maintain effective communication channels with the affected public and provide real-time information on incoming and outgoing flights and their evolving noise footprints.

Mitigation 7: The assessment states that there will not be night-time operations. Voluntary mitigation by the airport is not acceptable.

- Consider noise-related operating restrictions for night-time. These can be imposed on a voluntary basis by the airport, or by the Government.

Mitigation 8: Is the project proposing to pay to improve the sound insulation of buildings affected by the operational noise levels? Considering the assessment has assumed openable windows for ventilation, any improvements to the buildings would have to include alternative ventilation options (forced/mechanical ventilation), which is likely not feasible for residential and educational facilities.

In conjunction with the above-mentioned noise abatement measures, the introduction of ‘passive’ mitigation measures, such as noise insulation on existing residential dwellings and noise-sensitive buildings (schools, hospitals, etc.) may be considered.

An extensive noise monitoring and reporting scheme is proposed. This offers zero mitigation for the affected residential area.

It must be noted that the assessment does not consider the primary mitigation method, which is to move the runway further away from the “incompatible land use” areas.

5.0 Conclusions and Recommendations

The reviewed noise impact assessment has numerous errors and omissions:

- Basic acoustic calculation methods are incorrect (Table 3-3)
- No noise monitoring has been done (or reported) in the primary study zone under the proposed flight path in the Greenville City residential area. Noise monitoring was done at a non-typical time (the 2022 Easter weekend) but this was not explicitly reported.
- The “No-Go” scenario imagines an airfield completely different to the current airfield, with significantly more flights, including the use of two runways that are currently unmarked and derelict, one of which has a go-kart track or similar on it.
- A meaningless scenario of the first year of operation is included for no clear reason. The assessment is for the full operation of the airport.
- For the fully operational scenario, no large aircraft such as the Airbus A380 are included in the noise model despite claims in press releases that the runway is specifically designed to cater for these aircraft.
 - The longer rolling distance of the A380 compared to the Boeing 737 means that the aircraft will be significantly lower when passing over the land to the south, increasing noise levels in the area.
- The assessment states that noise levels in the fully operational scenario will be lower than the imagined “No-Go” scenario, but then shows this statement to be false in its own noise contour plots.
 - The assessment also disingenuously compares the number of operations between scenarios, where in the “No-Go” scenario the operations are all light aircraft while in the fully operational scenario there are 52 new large aircraft operations per day.
- The procedure set out in the Western Cape Noise Control Regulations, 2013 is not followed as the assessment recommends a report investigating mitigations is started before the airport reaches full capacity. Regulation 4 states that all mitigation methods are to be submitted to the local authority before approval is granted.
- The assessment gives a list of unproven, untested, and unassessed vague noise mitigation methods. None of the mitigation methods is shown to give any noise reduction, and yet the noise impact rating’s significance is inexplicably reduced from HIGH to MEDIUM.

Notwithstanding the queries over the aircraft used in the noise model, the assessment still highlights the following significant impacts on the Greenville Garden City residential zone:

- A large area is exposed to average noise levels above the district rating level with no proposed effective mitigation measures to reduce the noise levels to comply with the district rating level.
- A large area is exposed to noise events above 70 dBA over 50 times per day. This noise level has a severe impact on the suburban area and is not permitted by local regulations:
 - 70 dBA is 20 dBA above the daytime district rating level. SANS 10103 states “Vigorous community or group action” can be expected for noise levels 15 dBA above the rating level.

- 70 dBA is 13 dBA above the noise limit for a disturbing noise as defined by the Western Cape Noise Control Regulations, 2013. The regulations state that “A person may not allow a disturbing noise to be caused”.
- Australian Standard AS2021-2015 states that 70 dBA will likely “interfere with conversation”. This is a significant negative impact for residents and for learners in the schools.
- The assessment concludes that residential and school use is “incompatible” with the proposed airport land use.

It is clear that the proposed airport will have a HIGH, negative impact on the existing and future suburban land uses to the south, against which no realistic or meaningful mitigation has been proposed or is likely available to be imposed.

Based on the findings of the assessment, it is clear that the only feasible mitigation measure is to move the runway a distance to the north so that the significant noise impacts are largely located on the airport landholding.

The assessment therefore does not adequately assess the impact of noise from the proposed development on the Greenville Garden City property. The application must be rejected on grounds of noise impact on the Greenville Garden City.



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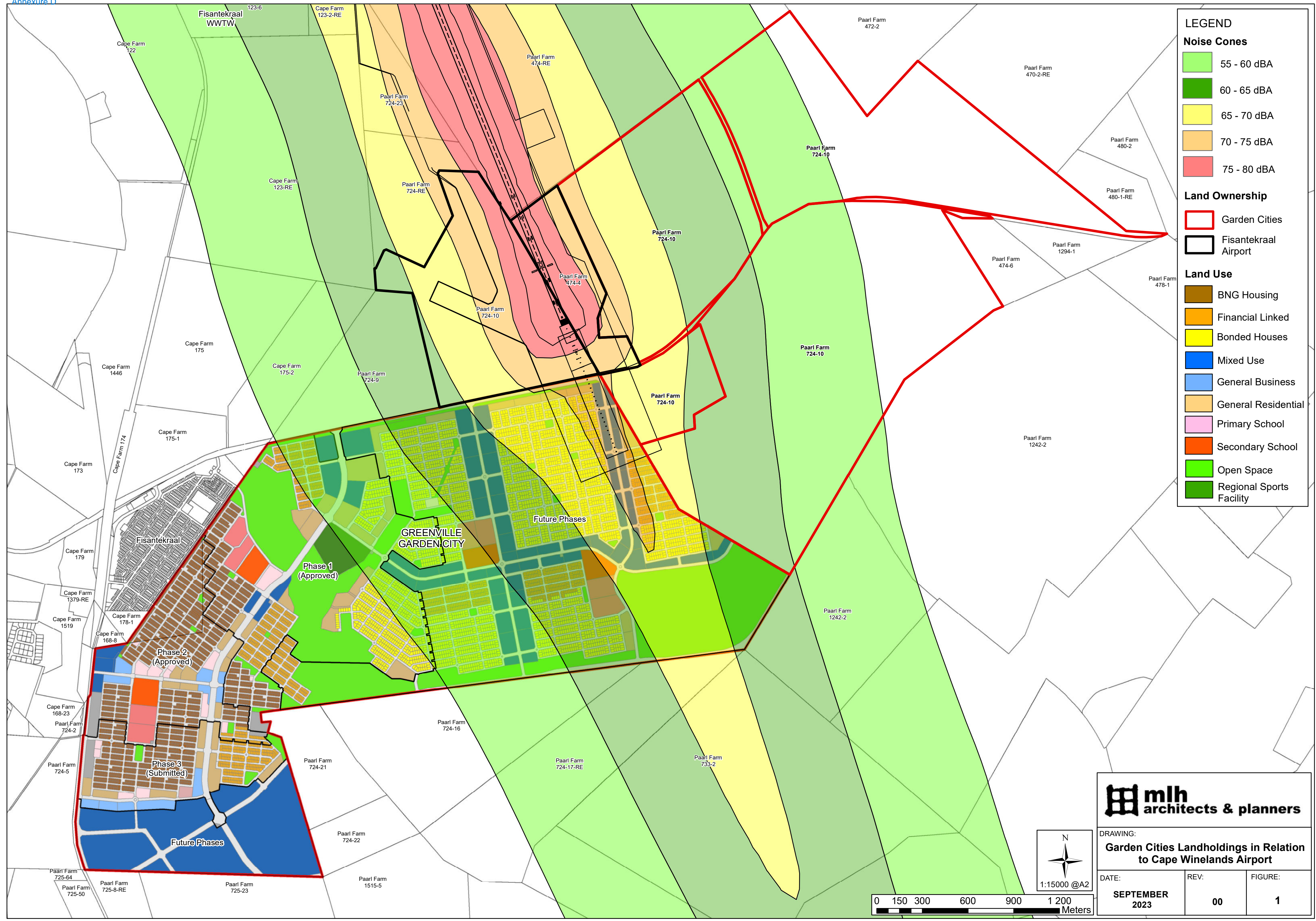
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LEGEND

Noise Cones

- 55 - 60 dBA
- 60 - 65 dBA
- 65 - 70 dBA
- 70 - 75 dBA
- 75 - 80 dBA

Land Ownership

- Garden Cities
- Fisantekraal Airport

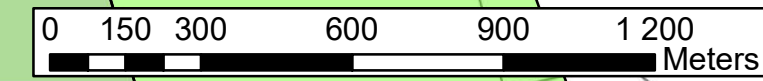
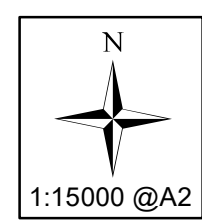
Land Use

- BNG Housing
- Financial Linked
- Bonded Houses
- Mixed Use
- General Business
- General Residential
- Primary School
- Secondary School
- Open Space
- Regional Sports Facility

mlh
architects & planners

DRAWING:
Garden Cities Landholdings in Relation to Cape Winelands Airport

DATE: SEPTEMBER 2023	REV: 00	FIGURE: 1
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"AC2"

MINISTRY of LOCAL GOVERNMENT,
ENVIRONMENTAL AFFAIRS and
DEVELOPMENT PLANNING

Provincial Government of the Western Cape

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REFERENCE: 3/5/3 (2011/64)

MAYOR D. PLATO

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mayor.mayor@capetown.gov.za

cc: Ms N. Murray

HEAD: PLANNING – INFORMAL SETTLEMENTS

HOUSING DIRECTORATE

CITY OF CAPE TOWN

Tel: 021 400 2400

Fax: 021 500 2771

For attention: Mr D. Faure

**NOISE CONTOURS FOR PLANNING DECISIONS AROUND THE CAPE TOWN
INTERNATIONAL AIRPORT (CTIA)**

Your officials' previous correspondence with the Directorate: Pollution Management regarding the above matter refers.

The Department does not have a formal policy position on an LRdn¹ noise level limit for the development of residential settlements around airports. SANS 10103: *The measurement and rating of environmental noise with respect to land use, health, annoyance and to speech communication* indicates that urban residential areas should not exceed an LRdn of 55dBA. This level is supported in the amendments to the Noise Control Regulations with the proviso that the SANS limits should not be significantly exceeded in the opinion of the relevant authority. World Health Organisation (WHO) guidelines (see attached) also support an LRdn of 55dBA for residential areas.

¹ The LRdn is the equivalent continuous day/night rating level. It is a measure of the average sound energy over a 24 hour period and is the prescribed method of measurement for airport noise in SANS 10117.

Some countries allow development in areas up to an LRdn of 60dBA or 65dBA but this is not based on studies of noise impact, but is due to pressure for land. The United States of America use the 65 DNL² for land use planning. The DNL is similar to the LRdn but uses a night time duration of 22h00 to 07h00 instead of 22h00 to 06h00. The DNL level is slightly higher than the LRdn value because of the noise generated by flights between 06h00 and 07h00. The USA have settled on the 65 DNL because the costs of noise insulation are more affordable than using the stricter WHO levels.

The Department acknowledges that strict adherence to an LRdn noise contour of 55dBA sterilizes a large amount of land for residential use although commercial and industrial land use would still be suitable. The pressure on urban land for the development of housing is a reality in Cape Town. Ideally an LRdn limit of 55dBA should be adhered to but various other factors influence siting of residential developments, such as the cost and availability of land and proximity to services. However, the long term consequences of creating permanent developments within these contours should be considered before such projects are implemented and it should be demonstrated that densification in other areas has been seriously considered.

It should be noted that there is a difference in the disturbance caused by traffic noise and aircraft noise even where the LRdn is the same. This is due to the relative consistency of traffic noise whilst aircraft noise is caused by an intermittent peak sound level as each aircraft passes overhead. The latter is more disturbing and is more likely to awaken a person from sleep than a constant level of noise. For this reason, L_{Amax} levels are informative for aircraft noise and should be considered together with the time of day and frequency with which they occur, as well as the LRdn level. This information was not provided to the Department at the time of discussion. Night time flights are likely to disturb the sleep of those close to the airport and are considered by the WHO to be linked to health and psychological stresses associated with sleep deprivation. It is possible to mitigate this impact by limiting night time flights. However, this is not currently the case, as freight flights operate during the night from Cape Town International Airport.

The Department also notes the WHO guidelines on the impacts of aircraft noise on schools and health care facilities which are considered to impair learning ability and recovery respectively. LRdn levels of 55dBA are considered necessary in these cases. It is not known whether the housing development will include such facilities.

² DNL is the day-night average sound level. DNL is the Federal Aviation Association of the USA's standard measure for determining cumulative exposure to noise. It is the average sound level in decibels over a 24-hour period with a 10 decibel penalty for noise occurring at night between 10:00 p.m. and 7:00 a.m.

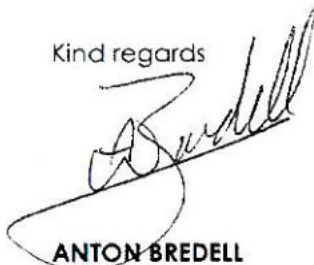
The Department therefore requests that development of housing on land where the 55 dBA LRdn noise contour is exceeded should be carefully considered before proceeding. It is recommended that the City consider public participation that informs the future residents of the noise impacts and include reference to noise disturbance from aircraft in the title deeds for the housing.

The Department further requests that, before a decision is made, the contours provided by the Airports Company of South Africa (ACSA) should be verified against those obtained by an independent study commissioned by this Department in 2006, looking at future noise contours for both the single runway and the second runway proposed by ACSA.

Any residential developments on land exposed to noise **above an LRdn of 65dBA** would not be supported by this Department.

Should you have any further queries, please contact Ms. C. Bill at Tel: [REDACTED] or via email at [REDACTED].

Kind regards



ANTON BREDELL

MINISTER

DATE: 9/5/2011



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ALL CORRESPONDENCE TO BE ADDRESSED TO:

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13 January 2025

PHS Consulting
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Per E-mail: amanda@phsconsulting.co.za

Dear Ms. Amanda Fritz-Whyte

**LETTER OF OBJECTION
PROPOSED EXPANSION OF FISANTEKRAAL AIRFIELD (AKA CAPE WINELANDS AIRFIELD)
NOTICE OF DRAFT EIA PROCESS
DEA&DP REF: 16/3/3/2/A5/20/2046/24 AND DWS REF: WU33620**

Further to your formal/advertised notification for the Draft EIA process and the associated Public Participation Process, relating to the various activities listed to facilitate a phased development to increase the existing Fisantekraal Airfield (aka CWA) and develop a runway with orientation 01-19 and a length of 3.5kms and the initial retention and refurbishment of a secondary cross runway with an orientation of 14-32 and length of 700m; with a phased supporting landside and airside infrastructure development, based on market demand, Garden Cities wish to:

- Remain registered as an I&AP
- Lodge a formal objection based on the following reasons and concerns

Historical background and associated concerns:

Our initial concerns are linked to the formalization of the airstrip's zoning and possible impacts same posed, as a direct result of this process and was based on both the process followed prior to the decision, as well as the implications of the decision on Garden Cities, our landholdings and our Greenville Development.

.../2

ENQUIRIES: Mr R Smith

REFERENCE: Fisantekraal Airfield (DEADP REF NO 16/3/3/2/A5/20/2046/24)
RS/ldt

DIRECTORS: S S STUTTAFORD (CHAIRMAN) P D A BAIRNSFATHER CLOETE V A CHRISTIAN M FEBRUARY (Mrs) P J HEEGER J ISAACS
T E MAFATLE R A MARSH E R STUTTAFORD M D STUTTAFORD J E WHITE

CHIEF EXECUTIVE OFFICER : J W MATTHEWS

COMPANY SECRETARY : K MILAN

The City of Cape Town's Municipal Planning Tribunal had granted the rezoning and consent approval. The reasons provided for the approval, did not acknowledge the existence of Greenville Garden City, and nor did it acknowledge the situation whereby the future development of the airport may have significant impacts on the development rights of Greenville Garden City and the current and future landowners of this large-scale, integrated, mixed use human settlement.

As we stated in our Objection letter, dated 6 August 2020 (attached for ease of reference), Garden Cities find it problematic that in the 22 page LUM motivation report for the Fisantekraal Airfield, there is NO mention of Greenville Garden City.

Garden Cities are the developers of Greenville Garden City and Erf 4 (this Erf alone constituting 384.6499 ha) Greenville Garden City is situated immediately to the south of the Fisantekraal Airfield.

The LUM motivation report also failed to mention the fact that Garden Cities have secured significant land use rights for Greenville Garden City. These land use rights were secured following a full environmental, heritage and town planning application process, and include:

- 14 652 residential opportunities (State-assisted, finance linked & market)
- 375 000sqm business GLA
- 352 000sqm industrial GLA.

Garden Cities are in the process of developing Greenville in a phased manner and have too date developed over 2,575 (as at Nov 2023) state-assisted houses. We have also developed Places of Worship, Educational Facilities, Clinis, Retail Facilities, etc..

It is concerning that the applicant for the Fisantekraal Airfield was either:

1. Not aware of Greenville Garden City and its development rights; which they have confirmed they were very much aware of Greenville's approved Conceptual Layout and, or
2. Chose to not include this important fact in the LUM application; knowing that it poses severe and restrictive limitations in terms of future residential, educational and other zoning uses.

In either of the above situations, we are of the opinion that this was a fundamental flaw in the LUM application and subsequent decision.

We also find it concerning that the City's decision letter, dated 12 November 2020, the 9 'reasons for decision' continues to ignore the existence of Greenville Garden City, with statements such as "*is not incompatible with surrounding agricultural land uses*". We would have thought that the points raised by Garden Cities in our objection letter would have been noted, discussed, and then adequately addressed as part of the 'reasons for decision'. In the absence of any reference to this issue, we find the City's decision letter to be flawed.

The planning for the Greenville Garden City landholdings took place over a number of years, in a joint manner together with the City of Cape Town. At this time, the City's position with regard to the Fisantekraal Airfield was as follows: "*... it can be expected that the land surrounding the airfield, in future be taken up by mainly residential uses. It is therefore concluded that the airfield should not remain in its present location, and any future applications relating to aviation uses should not be positively considered.*"(Draft Northern District Plan (August 2009).

The draft Cape Town Spatial Development Framework (August 2009) stated that: "*All general aviation from Fisantekraal should be relocated to Atlantis.*"

3.

The approved Northern District Plan (October 2012) went further to state: "The land use rights for the airfield to operate has however lapsed ... (and) that provision needs to be made elsewhere for such a facility."

This clear and unequivocal planning and policy context facilitated the land use layout for Greenville Garden City and was one of the imperatives for the development being approved by the Western Cape Government's Department of Environmental Affairs and Development Planning in December 2012. A copy of the Approval letter and Conceptual Layout is attached.

Garden Cities are of the opinion that any decision which confirms land use rights for the Fisantekraal airfield has the potential to impact extremely negatively on the approved land use rights that have been granted for Greenville Garden City.

We find it disingenuous that the Greenville Conceptual Plan is referenced (App-23-CWA-Spatial-Planning-and-land-use-status, page 28) as lapsed plan; however in our mind the status of this plan is very much intact and merely implies that the rezoning is attended too as well when the LUM application is submitted to undertake the required subdivision of each future Phase of the development. The Concept Plan; Urban Edge; Agricultural Land (Act 70 of 70); the District Plan, Urban Development Designation and basket of rights cannot lapse, as this plan was approved by various authorities including the Western Cape Government, National Department of Agriculture and the City of Cape Town as an all-encompassing project.

Extract (App-23-CWA-Spatial-Planning-and-land-use-status, page 28):

This very large new town is conceptualised to be developed in phases and the first phases have been implemented, infrastructure and top structures developed starting on the eastern side with its Phase 1.

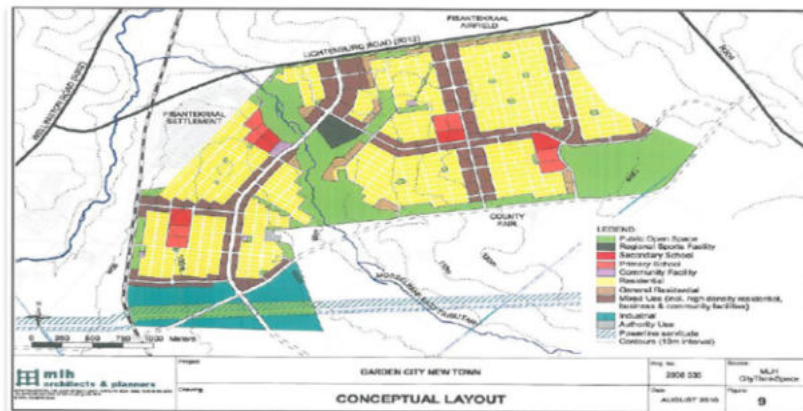


Fig. 17. Conceptual Layout Greenville
MLH architects and planners dated August 2010.
(source: Zoning Scheme Extract issued by City of Cape Town on 07 June 2022)

Erf 4, approximately 384 ha in extent, is directly to the south of Cape Winelands Airport, only separated by Lichtenberg Road (see Fig. 14). The 2010 Conceptual Layout envisaged Mixed Use (including high density residential, business and community facilities), residential, schools and open space.

As set out in the section under Existing Zoning, the Zoning Scheme Extract issued by City of Cape Town on 07 June 2022, states that Erf 4 Greenville is zoned as "AGRICULTURAL ZONE (AG)" and further notes that:

"The rezoning of Erf 4, Greenville Garden City, issued under cover of the enclosed letter dated 3 December 2012, has lapsed. No submission has been made for the subdivision of Erf 4 within the 5-year time period allowed."

And in any event, this land use management decision was limited to the existing airfield and runways and not the currently envisaged regional airport.

4.

Feedback relating to various Reports:

We have previously raised our concerns in our letter of objection dated the 05 Dec 2023 in which we clearly highlighted various concerns.

Based on our concerns and the severity of impacts posed by the proposed airport, Garden Cities has now appointed Mr. Richard Summers, from Summers Incorporated, to formally respond and object vehemently on our behalf.

We stand by our previous concerns raised and we address in Summers Incorporated specific concerns linked to:

- The NIA and misleading and misrepresentative information encompassed therein; our specialist report attached.
- Garden Cities existing Land Use rights.
- Various other concerns encompassed in the additional 47 reports submitted for review.

We are extremely concerned regarding the proposed CWA and the resultant impacts it will have on Greenville Garden City, and the layout that has been endorsed by the relevant authorities as part of the 10-year authorization process. The location of this airport is unsuitable in its present location and would strongly believe that other alternative locations should be considered as a more suitable and less invasive solution to the existing landscape, existing in-hand approvals and surrounding land-uses.

Thank you,


Garden Cities NPC (RF)

Encl.

- Garden Cities_Letter of Objection_05 Dec 2023
- Greenville Conceptual Plan
- Available CTI Noise Cones superimposed, to obtain and gain access to potential impacts.
- Letter from Anton Bredell – Reverberating our concerns regarding noise cones.
- Garden Cities' NIA specialist review report.

CWA IAP Register – CoCT Officials

	Designation / Description	CoCT Official	CoCT Email Adress	Keep / Remove from Register
1	Environmental Management Department: Environmental and Heritage Management Branch - North Region	Sonja Warnich Stemmet	Sonja.WarnichStemmet@capetown.gov.za	Keep
2	Environmental Management Department: Environmental and Heritage Management Branch - North Region	Clarissa Fransman	Clarissa.Fransman@capetown.gov.za	Keep
3	Ward councillor PR	Chumani Kobeni	Chumani.Kobeni@capetown.gov.za	Keep
4	Ward Councillor Ward 102	ClIr Rhyndardt Bresler	Rhyndardt.Bresler@capetown.gov.za	Keep
5	Ward Councillor Ward 105	Ruan Beneke	Ruan.Beneke@capetown.gov.za	Keep
6	Sub councillor 7	Carin Viljoen	carin.viljoen@capetown.gov.za	Keep
7	Sub councillor 2	Amelia Van Rhyn	amelia.vanrhyn@capetown.gov.za	Keep
8	Sub councillor 2	Monique Bending	Monique.Bending@capetown.gov.za	Keep
9	Mayor	Geordin Hill Lewis	DeirdreTania.Borman@capetown.gov.za	Remove
10	Deputy Mayor	Edward Andrews	Edwin.Andrews@capetown.gov.za	Remove
11	Principle Professional Officer – Water Demand Management; Borehole Management	Shamile Manie	Shahied.solomon@capetown.gov.za	Please Advise
12	Head: Tech. Development & Infrastructure Planning; Wastewater Branch; Fisantekraal WWTW	Sven Sotemann	Sven.Sotemann@capetown.gov.za	Please Advise
13	Principle Professional Officer – Water & Sanitation – Region 3 Kraaifontein	Tiaan Wright	Tiaan.Wright@capetown.gov.za	Please Advise
14	Principle Professional Officer – Transport Directorate	Willie Liebenberg	WillieF.Liebenberg@capetown.gov.za	Please Advise
15	Head: Catchment Planner - Bulk Services Branch - Northern Regions	Johan Terblanche	Johann.Terblanche@capetown.gov.za	Please Advise
16		Charles Rudman	Charles.rudman@capetown.gov.za	Remove
17	Head Operations North: Wastewater Branch, Bulk Services, Water and Sanitation	Werner Rossle	Werner.Rossle@capetown.gov.za	Please Advise
18	Spatial Planning and Environment	Robert McGaffin	Robert.Mcgaffin@capetown.gov.za	Remove
19	Urban Planning and Design	Erika Naude	Erika.Naude@capetown.gov.za	Remove
20	Head Specialised Environmental Health Air Quality Officer	Ian Geldenhuys	Ian.Gildenhuys@capetown.gov.za;	Keep
21	Head of Environmental and Heritage Management	Morne Theron	morne.theron@capetown.gov.za	Remove
22	Mayoral committee member	James Vos	James.Vos@capetown.gov.za	Remove
23	Durbanville Municipal Offices - Subcouncil 7 (Area North)	Patricia Giliomee	Patricia.Giliomee@capetown.gov.za Subcouncil.7@capetown.gov.za	Keep
24	CoCT Air Quality Management	Meroline Ockhuis	Meroline.Ockhuis@capetown.gov.za	Remove
25	CC'd by Private IAP	Susan Matthysen	susan.matthysen@capetown.gov.za	Please advise
26	Registered as a local resident	Johan Lourens	JohanHendrik.Lourens@capetown.gov.za	Please advise
27	CC'd by Private IAP	Ronel Voster	RonelJoan.Vorster@capetown.gov.za	Please advise

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28	CC'd by Private IAP	Mikayla Bourne	MikaylaVineesha.Bourne@capetown.gov.za	Please advise
29	CoCT Subcouncil Manager 3 (Ward 4, 55, 56, 104 & 113)	Roxanne Moses	Roxanne.Moses@capetown.gov.za	Keep
30	CC'd by Private IAP	Theresa Uys	Theresa.Uys@capetown.gov.za	Please advise
31	Admin Officer CoCT Subcouncil 7	Elmaleen du Plessis	Elmaleen.DuPlessis@capetown.gov.za CSRegistry.Durbanville@capetown.gov.za	Keep
32	CC'd by Admin Officer CoCT Subcouncil 7	Francois Berry	francois.berry@capetown.gov.za	Keep
33	CC'd by Admin Officer CoCT Subcouncil 7	Lorraine Frost	Lorraine.frost@capetown.gov.za	Keep
34	CC'd by Admin Officer CoCT Subcouncil 7	Gerhard Fourie	Gerhard.fourie@capetown.gov.za	Keep
35	CCT AQM	Lumko Vazi	lumko.vazi@capetown.gov.za	Remove
36	CCT Noise	Werner Geldenhuys	werner.geldenhuys@capetown.gov.za	Remove
37	Traffic	Jacqueline Lottering	Jacqueline.Lottering@capetown.goc.za	Please Advise

Keep

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