

APPENDIX 29D

COMMENTS AND RESPONSE REPORT (IN-PROCESS AMENDED EIA PHASE)

CONFIDENTIALITY NOTICE - INFORMATION SUBJECT TO POPIA AND
COMMERCIALLY SENSITIVE CONTENT HAS BEEN REDACTED FROM THIS PUBLIC
VERSION AND IS ONLY INCLUDED IN THE VERSION SUBMITTED TO DEADP FOR
DECISION-MAKING PURPOSES.

Registered Interested and Affected Parties Comments & Responses

No.	Name & Presenting unit	Issue/ Concern	Response
Late Comments: 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]			
346	Lozaan Burger – The Parrot Sanctuary	Email dated 4 March 2025: Goeie dag Amanda Ek adresseer die mail net aan jou. My vertrouwe lê by jou. Ek skryf dit ook in Afrikaans, want dis my hartstaal. Dis al Maart en ek het nog geen terugvoer van julle gekry nie. Die situasie met die lughawe wat presies 3km van ons papagaai sanctuary en tuiste, gaan kom, veroorsaak baie ongesonde stres op ons. Die voortdurende onsekerheid lei tot ang en ontrekkingsgeFdrag. Ons het elke sent moontlik in ons eiendom gesit om dit 'n veilige hawe vir ons en die weggooi, gestremde papagaai te maak, elke sent. Ons het nie geskroom om te "oor" kapataliseer nie, want dis mos ons "forever" huis. Ek het die afgelope maand by eiendomsagente (EXP Realty, Elmarie) gaan aanklop vir moontlike verkoop. Ja, hulle ooo en aaa, dis pragtig, dis so modern, dis so netjies, dis so groot, MAAR, die eiendom's pryse (markwaarde) in Mikpunt is maar laag. Die eiendoms mark in Mikpunt is ook versadig. Ja, ek verstaan dit, maar ons eiendom lyk bietjie anders as die eiendomme wat tans in die mark is! Ons is trots op wat ons in 8 jaar se tyd vermag het. Ons het 8 voet vibracrete om ons hele erf gesit. Dis geëlektrifiseerd. Ons het 'n strek, skoon boorgat. Ons het 'n volledige besproeiings stelsel laat insit. Ons het uit niks 'n pragtige tuin geskep. Ons het sekuriteitsligte en kamaras geïnstalleer. Ons het derduisende spandeer om die	EAP response: Subsequent to this email from the IAP the EAP set up a meeting with the IAP at their house in Mikpunt on 15 April 2025 to discuss the proposed development. The EAP and the CWA team were present, and the notes from the meeting is provided inn Appendix N to the proof of PPP report. Email from CWA to IAP dated 13 May 2025: Our on-site visit and discussions at your facilities on the 15th of April and subsequent SMS messages refer. We are pleased that you have indicated a willingness to offer your expertise, facilities and services in bird rescue to support the airport development. We envisage this to happen by way of a collaboration between ourselves, the details of which we will document jointly in the format of a Memorandum of Understanding (MOU). As discussed we will arrange for a follow-up meeting within the next two weeks during which we will agree on a framework and scope for the intended MOU. Following the meeting we will present you with the draft MOU for your consideration and further comment, once that has been finalised we will jointly sign the MOU. Thank you again, I trust that you will find this in order. I have placed the EAP's in copy to create awareness of our intended collaboration, they will update their records accordingly. EAP response: Subsequent to the above communication an agreement has been reached between the IAP and CWA.

	papagaai kamer en aviaries te bou. Ons het die plek omskep as 'n paradys vir ons en alle papagaai in nood. Ag jaar se swoeg en sweet, tot 'n plek waarop ons trots is. Stilte, naby die natuurskoon, skoon lug, ons eie paradys. Ek het ook rondgebel na papagaai rescue plekke, almal is oorvol. Daar is nie 'n manier dat ek die papagaai gaan opsplits en hulle weer in hokke soos misdadigers gaan laat sit nie. Nie oor my dooie liggaam nie!!! As dit moet, sal ek elke diere organisasie en liefhebber kry, om my te steun. Ja, ek stress!! Ek en my man is besig om te verval in 'n helse depressie. Daai onsekerheid. Wat gaan van ons en die papagaai word? En dan natuurlik die feit dat ons, ons hardverdiende geld in die water gegooi het. Die feit dat daar nie 'n paar ekstra miljoene in 'n spaarvarkie lê, om ons te hervestig nie. Kontak gerus dr Lamprecht ons huisdokter, hy sal vir julle 'n verslag kan gee van ons erge depressie as gevolg van die impak van die lughawe op ons gesondheid. Die onsekerheid van waarheen, wanneer, dit vreet soos kanker aan ons. Dit laat jou voel jou lewe word ge"pause". Verlore tyd. Alles is op "hold". Daar is werk aan die aviaries nodig, maar jy het die gevoel van, dis nog geld in die drein af. Jy weet, die ergste van alles is, ek besef wat se positiewe impak Cape Winelands Airport op die Wes Kaap gaan hê. Niemand, nou praat ek van vroue, sowel as mans, wil die lughawe pad na Cape Town International ry nie. Dis die pad van die dood. Dis soos om "Russian roulette" met jou lewe te speel, elke keer wat jy moet vlieg. Van my vriendin gebruik eerder "Uber" om by die lughawe uittekom, ander soos ekself, vertrou ook nie eens Uber nie, dis soos om tussen die duiwel en die diep blou see te wees. Soveel mense wat ek persoonlik ken, is al op daai pad aangeval, karre met klippe gegooi, een is al geskiet op.	

		Ek verstaan die belangrikheid van die Cape Winelands Airport. Ek verstaan die impak op die ekonomie, ek verstaan die werkskepping, ek verstaan... MAAR!!! Ek weet ek is soos 'n druppel, teen die kant van die emmer, nie eens binne die emmer nie, maar as ek nie vir my, my man en die papagaai gaan baklei nie, wie gaan? My belange lê nie by Mikipunt nie, my belange lê by "ons". Ons gemoedsrug, ons veiligheid, ons gesondheid. Ek sal die duwweltjie in julle skoene bly, tot ek antwoorde en gemoedsrus kry. Ek sal veg vir elke papagaai in my beheer. Tong in die kies, 🤔 miskien moet ek ook gaan aanklop by Trump en Elon, of nog beter, nader... Johann Rupert.... Dankie vir die tyd wat jy afstaan om dit te lees. Ek vertrou ek sal spoedig 'n antwoord van julle kry.	
347	David Esterhuizen - Euro Steel	Communication from IAP to CWA on 21 February 2025: 1. I'm in full support of any new developments, but am concerned about whether noise levels over Durbanville area is part of the environmental study and whether an increase in job opportunities may lead to an increase in the informal settlement size around it creeping closer to Durbanville residential development and negatively affecting property values. Email dated 4 March 2025: 2. Please add me to the distribution list of "affected parties"	Response from CWA to IAP on 4 March 2025: 1. Thank you for reaching out to us and apologies for the delayed response. The Environmental Impact Assessment (EIA) is currently underway which evaluates all potential impacts, including noise levels and development in the surrounding areas. To ensure your questions and inputs are considered, please register as an interested and affected party by emailing amanda@phsconsulting.co.za - this is important to do as it ensures that your comments are included and addressed in our process. Email response from EAP on 4 March 2025: 2. We will include you in the register as IAP for the proposed project.
348	Sally Brus - Paardeberg Stud	Email dated 7 March 2025: 1. We wish to register as an interested party, as we farm stud horses on the Vryguns Road.	Email response provided 7 March 2025: 1. Thank you for the email. We will register you as IAP for the proposed project

349	Tia du Plessis – SANRAL	Email from Tia du Plessis (SANRAL) to Johan Brink (ITS) dated 12 March 2025: 1. Good day Johan – please see attached letter from SANRAL for your attention.	
		Letter received via email dated 12 March 2025: IMPROVEMENT OF NATIONAL ROUTE 1, SECTION 1 OLD OAK ROAD (KM 18.6) TO KOELENHOF INTERCHANGE (KM 32.8) 1. Your email dated 31 January 2025 addressed to our Mr. R. Lorio refers. Attached to the aforementioned e-mail is a copy of the letter sent by the Western Cape Government: Department Infrastructure to PHS Consulting (dated 13 December 2024). For ease of reference a copy of this letter is attached <i>(please refer to comment nr 332 in the in-process draft EIAR Comments and Response Report for the original letter received by PHS Consulting and responses thereto).</i>	Response by EAP: 1. The letter referred to is included and has been responded to in the previous C&R (Appendix 29C). Please refer to comment nr 332 in the in Appendix 29 C (In-process draft EIAR Comments and Response Report) for the original letter received by PHS Consulting and responses thereto.
		2. The abovementioned letter comprises the WCG's response to the In-Process Environmental Impact Assessment (EIA) Report and the Traffic Impact Statement regarding the proposed expansion of the Cape Winelands Airport. SANRAL is not an interested and affected party and hence did not receive the said report and traffic statement. This is of no concern, since SANRAL is only indirectly affected and indicated such at the time. However, we wish to respond to the following statements in the WCG's letter since it appears that the author of the letter is not aware of the planned work on National Route 1, section 1, between Old Oak and Koelenhof interchange as well as the completion of the Stellenberg (NI/R300) interchange at NI-I: km 20.0. This may influence the way in which the application is considered.	2. EAP response: SANRAL has since been included as IAP for the amended draft EIAR. Responses to comment raised by SANRAL is addressed below.
		3. Paragraphs 5.1 and 5.2 create the impression that the Koelenhof interchange (NI/MRI 74) interchange is a proverbial bottleneck and that it would remain such. Although it is correct that the interchange is at present operating at capacity during peak hours it will not remain the case in future. During the last three years SANRAL has been attending to the design of the improvement of the	3. Response from ITS: The comment from SANRAL addresses some of the comments/concerns raised by the WCG. SANRAL confirms its commitment and prioritisation of upgrading both the N1 interchanges with MR174 (Koelenhof Interchange) and the R300 (Stellenberg Interchange). This comment from SANRAL is noted and confirms the

	NI between Old Oak and the Koelenhof interchange. Not only will additional lanes be added to the existing freeway but all the interchanges within this portion of the national road will receive attention. The Koelenhof interchange will be upgraded by adding additional lanes and improved ramp terminals which would increase its capacity. This project is in all respects ready to go out to tender, but its implementation is affected by the Wemmershoek bulk water supply pipeline that runs between the existing two carriageways. The responsibility to relocate this pipeline rests with the City of Cape Town. SANRAL has been in communication with the City during the design period and they fully appreciate the situation. Dealing with a bulk service of this nature places a large financial burden on the City, but it is foreseen that a way forward will shortly be determined. Once we have reached agreement with the City of Cape Town regarding the future of the pipeline, we would be able to determine a date to advertise the tender. This project has been (and is) high on the priority list.	capacity improvements along the N1 that has been recognised in the CWA TIA. Even if the implementation is delayed with a couple of years, the upgrades will very likely coincide with the CWA development and the assumed background developments listed in the TIA.
	4. Paragraph 5.3 creates the impression that the northern extension of the R300, which is being undertaken by the WCG, may not be connected to the NI at the Stellenberg interchange (NI-I :km 20.0) and hence could render the 2032 scenario flawed. This is not accurate. The statement "no agreement has been signed for SANRAL to design and construct the missing link" needs some context. It was originally contemplated that SANRAL and the WCG would enter into an agreement by which the WCG becomes the implementing authority, since these two developments are mutually dependent on one another. This agreement never came into being. The absence of such agreement is however not critical since SANRAL has jurisdiction up to De Bron Road and can independently undertake the required works.	4. Response from ITS: Refer to point 3 above
	5. SANRAL recently appointed a consulting engineer who has commenced the design work to complete the interchange and the link of the R300 up to De Bron Road. At De Bron Road it will connect to the WCG's portion of the R300. Although SANRAL's work is following behind the WCG work, it is a realistic expectation that the R300 northern extension would be fully operative by 2032, unless something unexpected and outside of the control of the two road authorities (SANRAL and WCG) occur.	5. Response from ITS: Refer to point 3 above

		SANRAL fully appreciates the importance of the national roads (freeways) in the metropolitan area.	The comment is noted by the EAP.
350	Zane Williams – Greater Durbanville Business Chamber	Email dated 13 March 2025: 1. Hope this communicate finds you well. After extensive deliberations with our Board, due to service provider technical problems outside our control, permission was granted to change our Primary email communication address to same. Please use as per this notification	1. EAP response: This comment is noted, and the contact details have been updated in the IAPs register.
Amended Environmental Impact Assessment Report (DEA&DP Ref: 16/3/3/2/A5/20/2046/24; DWS Ref No: WU33620) [45 day commenting period commencing on 19 March 2025 and up to and inclusive of 13 May 2025]			
351	Sharl Perrins	Email dated 19 March 2025: 1. Excellent. Thank you. May it go well. Please feel to reach out if any videography or drone footage needed. Including radio interviews.	1. This comment is noted.
352	Heidi Stumpf	Email dated 19 March 2025: 1. Please advise where you got my contact details from. Email reply dated 19 March 2025: 2. I do not recall registering, could you please remove my details from the database? Email reply dated 19 March 2025: 3. Thank you. It is of great concern that a number of CPF members have received this email, without their consent. This is in contravention of the Popia act.	EAP Response provided 19 March 2025: 1. You registered at the Durbanville CPF meeting held on 21 November 2024. Please advise whether you would want to remain on the mailing list or whether you want to be removed. Email response provided 19 March 2025: 2. Thank you Heidi. We will do so Email response provided 20 March 2025: 3. The request for the Attendance Register was made to the chair of the CPF by Anton Oliver and provided as proof of stakeholder engagement. Anton

		Please consider this when taking personal information without consent, as it may cause an unnecessary backlash regarding the good work that is being done by Cape Winelands Airport. Email reply dated 20 March 2025: 4. Thank you for your email. Please unsubscribe ALL CPF members that did not give explicit permission for their personal details to be shared. CPF email address can remain. Your email does not offer an option to unsubscribe, please consider this when sending emails.	Oliver is the head of security at CWA and did a presentation at the meeting on the security of CWA. Any members who wish to have their details removed from the register for the project can please notify me and we will remove them. Email response provided 20 March 2025: 4. We will do so. Is the CPF email address answered by the chair of the CPF or the secretary, just so I know how to address the person. NOTE the bottom of my signature on the email where it states: <i>You are receiving communication from us for professional reasons or as Interested and Affected Party only. The Protection of Personal Information Act (POPIA) requires that we protect your information and that we obtain your consent to communicate with you in the future. If you wish to be removed from any data list, simply state so, or we will remove your detail after a project is completed. Note we will use your personal information confidentially and professionally.</i> Emails sent have no contact details showing so you can be assured no personal details are shared in the public domain. Note: the IAP register has been amended to remove all CPF members and only leave the CPF email address.
353	Esme Erasmus	Email dated 19 March 2025: 1. This is an automatic out of office reply. I am currently not available due to a domain migration. My new email address will be [REDACTED]	1. EAP response: This comment is noted, and the contact details have been updated in the IAPs register.
354	Herbier	Email dated 19 March 2025: 1. Please remove me from the mailing list	1. EAP response: The IAP has been removed from the IAP register.

355	Barend du Preez - Western Cape Government Department of Infrastructure Chief Directorate Road Planning	Email dated 19 March 2025: 1. I trust this email finds you in good spirit. Has SANRAL Western Cape been included in the list of Interested and Affected Parties? Have you seen their letter of comment on our previous letter of comment? If not, I can forward it to you?	Email response provided by EAP 19 March 2025: 1. Thank you for the email. I received the attached in copy from SANRAL on the 12th March [<i>Please refer to comment nr 349 within this C&R Report</i>]. Is this the same letter you are referring to? SANRAL has been included as IAP for the proposed project. Note: No further communication received from IAP after this email was sent.
356	Kate Ramusi - WBHO	Email dated 19 March 2025: 1. Please add me to the contact list Email reply dated 19 March 2025: 2. Noted Amanda Thank you	Email response provided by EAP 19 March 2025: 1. We will add you to the register. Please be aware we are starting a 45-day public participation process today on the amended draft EIAR for the proposed project. Please find notification letter attached for your information and participation.
357	Michael Veldman-Verni Construction Products	Email dated 19 March 2025: 1. Thank you for your email and the attached CWA Letter. I have included my previous communications with all relevant parties for your reference (<i>Please refer to Appendix A (C357) of this C&R Report</i>). I would appreciate the opportunity to conduct a full presentation for your company at a convenient time. We offer a diverse range of over 220 specialized products, including: • 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	Email response provided by EAP on 19 March 2025: 1. Thank you for the email. I am the independent EAP appointed for the NEMA Scoping and EIA Phase and not a representative for the applicant. Please feel free to communicate further with Deon (herein copied) as the applicant representative without my or Olivia's further involvement. If, however, you also wish to provide comment on the amended draft EIAR please direct such comment to me and Olivia. Email response from CWA to the IAP dated 19 March 2025: 1. Thank you for your interest and for reaching out. As a first priority we are now focused on securing all statutory approvals including EIA approval. There will be a time at a later stage when we will enter the procurement stage, in the meantime please be sure to register your

		In particular, our concrete waterproofing systems require no maintenance, are damage-resistant, and can contribute to achieving Green Star ratings for projects and runways. Please let me know when we can schedule a presentation to introduce our solutions in more detail.	interests on our website using the following link: https://capewinelands.aero/opportunities/#supp-reg I trust that you will find this in order.
358	De Munck Menderoi - Devac	Email dated 19 March 2025: Can you please indicate, as I have expressed my interest before, has a Pr. CHSA joined the professional team and which registered Pr. CHSA has been appointed? This request, in terms of Promotion of Administrative Justice Act,(PAJA), Act 3 of 2000, has been submitted with non-compliance to section 5.(1) and (2) of this request where 90 days for administrative response has been exceeded. Additional time in terms is section 9.(1)(b) could not be implemented to exceed the 90 days as a reduction (section 9.(1)(a)) on such minor administrative requirement be deemed appropriate. Your immediate response is required on this matter without further delay which can cause report of non compliance to regulations in respect of the EIAR.	Email response provided by EAP on 19 March 2025: Thank you for the email. Please refer to responses provided to your previous comments and included in the Comments and Response reports for the various phases of the NEMA Scoping and EIAR process. The download link for documentation related to the proposed project is https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/. You were also previously notified of the availability of these reports and the opportunity for further comment during the Scoping and EIAR process. Proof of notification can be provided upon request.
		Email reply provided 19 March 2025: I tried to find this amongst your documentation as the documents carries different names as to what you pointed out "Comments and Response reports", eg. AP XXX.	Email response provided 19 March 2025: The 3 comments and responses reports are labelled as below:  App 29A - (Sanitised) C&R Report (Pre-application Scoping Phase) web  App 29B In-Process Draft CR Report - Sanitised compressed web  App 29C In Process draft EIAR CR Report Sanitised pw web Please let me know should you require further assistance
		Email reply provided 19 March 2025: I scrolled through the 3 documents, but could not located your response.	Email response provided 19 March 2025: Your comments with responses is nr 30 in Appendix 29A, starting on page133 – see clip attached.

		4. As an owner/member of Erf 360/724, I have 1992 (31 years) and member of the Joostenbergdorp Community Forum (JC) please accept these preliminary comments on the Proposed Expansion of the Cape Winelands Airport. I am not opposed to the CNA per se, but wish to ensure that: 4.1. The proposed to use land as that for access to the Erf be removed from the plan. I am opposed to the upgrade and widening of roads that will destroy the rural character of Joostenbergdorp. There are numerous alternative access roads, and more suitable sites for any additional access roads that may be needed. 4.2. The Environmental Impacts on surrounding wetlands, water courses and agricultural land be properly assessed and preservation of water systems be ensured. Conservation of the Critical Biodiversity Area on the eastern boundary is essential. 4.3. Potential negative impacts on the Joostenbergdorp Cultural Landscape, to the south, be assessed and mitigated. 4.4. Potential Environmental Impacts (such as biophysical, socio-economic, noise and traffic) must include the whole of Joostenbergdorp, south of Paarl road, as far south as the N1, East to the R304 and West to the Oudmooieksrivier line. 5. Thank you for your kind cooperation in these matters. Please confirm in writing to [redacted] that you have received this email.	4. The comment is noted. 4.1. The comment is noted. The Transport Impact Assessment will consider the DCT future road network plan, which includes local roads that will be included. However, the impact of the proposed road networks and larger network and input will be considered and all registered IAPs will have the opportunity to consider the report and comment on it during the Impact Assessment phase of the IAP. 4.2. The comment is noted. The Free-water Estimated Impact Assessment and the Botanical Impact Assessment will consider the impact of the proposed project and all registered IAPs will have the opportunity to consider the report and comment on it during the Impact Assessment phase of the IAP. 4.3. The comment is noted. The Heritage Impact Assessment (including the Visual Impact Assessment) will consider the impact of the proposed project and all registered IAPs will have the opportunity to consider the report and comment on it during the Impact Assessment phase of the IAP. 4.4. The comment is noted. Assessment spatial size is dependent on the impact type assessed and will be determined by the specialist in that field. 5. The comment is noted. Confirmation was sent by email on 8 December 2023.
30	De Munk Mendoor - DEWAC	Email dated 30 November 2023: 1. Ek het die dierprofiel van die projek gesien en dit is baie goed. Ek het ook gesien dat die projek baie goed is. Ek het ook gesien dat die projek baie goed is. Ek het ook gesien dat die projek baie goed is. 2. Ek het ook gesien dat die projek baie goed is. Ek het ook gesien dat die projek baie goed is. Ek het ook gesien dat die projek baie goed is. Ek het ook gesien dat die projek baie goed is.	Email response from EAP: 30 November 2023: Thank you for the email. I will register you as an IAP and record your comments. Response: The comments and concerns are noted, and the IAP is registered for the proposed project. The proposed project is currently in the 16 process where various "health & safety" aspects are considered of the noise & air quality. H&S

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		3. On a project, not have good understanding, but also wish to see a good project, must approve project to be a good project.	3. The comment is noted. The project is currently in the 16 process where various "health & safety" aspects are considered of the noise & air quality. H&S
30	De Munk Mendoor - DEWAC	Email to DEWAC dated 30 November 2023: 1. Please see attached correspondence between parties. It is of great concern that the professionals do not include the Construction Health and Safety Practitioner from stage 1 into stage 2 development planning. The legislative scope of work as stated for Dr. DEWAC include access from stage 1. It is the DEWAC responsibility to request that the Health and Safety report for such projects are also submitted. Email response from DEWAC dated 6 December 2023: 2. Thank you for your enquiry. With specific reference to your email of Thursday, November 30, 2023, 11:15 PM. It is noted that the proposed Environmental Assessment Practitioner, Mr. Mendoor, is a registered Environmental Assessment Practitioner (EAP) and has registered you as an Interested and Affected Party, meaning that you can participate in the Public Participation Process pertaining to the 16 process. EXPANSION OF CAPE WINELANDS AIRPORT ON PORTION 10 OF FARM 724, THE REMAINDER OF FARM 724, PORTION 71 OF FARM 724, PORTION 7 OF FARM 724, THE REMAINDER OF FARM 474, PORTION 3 OF FARM 474 AND PORTION 4 OF FARM 474, OUBERVALE. In view of the above, please be informed that you are allowed to provide comments on the above-mentioned pre-application process by forwarding it directly to the approved Environmental Assessment Practitioner. Please note that this Department's Development Management Directorate is currently administering the pre-application process as applicable to the National Environmental Management Act, 2008 (Act No. 107 of 2008) (NEMA) and the Environmental Impact Assessment (EIA) Regulations, 2010 (as amended). Please find your email and this in order. Email reply to DEWAC dated 6 December 2023: 3. My comment made was in regard of the standard reports to be included in any application including pre-application of access and not just specific to the Cape Winelands Airport Development.	3. The IAP notes the communication between the IAP and DEWAC. 3. The comments and concerns are noted. The proposed project is currently in the 16 process where various "health & safety" aspects are considered of the noise & air quality. H&S

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361	Alana Britz	Email dated 19 March 2025: 1. I would like to register interest for the open day on the 15th of April. Email reply dated 20 March 2025: 2. Thank you!	Email response provided by EAP 19 March 2025: 1. Thank you for the email. There is no need to pre-register for the open day. You can arrive and register at the entrance to the hall and interact with the specialist and technical staff at your own time and as needed.
362	Elmaleen du Plessis – Sub council 7	Email dated 19 March 2025: 1. Could you kindly add the new Subcouncil Manager to Subcouncil 7 as an interested and affected party going forward. Her detail: Lorraine Frost, email: Lorraine.frost@capetown.gov.za. Lorraine: For information	Email response provided by EAP 19 March 2025: 1. Thank you Elmaleen. We will do so
363	Billy Griffiths	Email dated 19 March 2025: 1. Baie voorspoed, ek kan net voordele sien in hierdie projek.	Email by EAP dated 19 March 2025: 1. Thank you Billy for the email
364	Application Manager – Western Cape Roads Infrastructure	Email dated 19 March 2025: 1. The message below refers to your application for the submission of a property environmental study for comment (Application No - 2025-03-0072) submitted to the Western Cape Government on 2025/03/18: Properties related to the application: • Portion 7 of Farm KLIPRUG 942, MALMESBURY • Portion 3 of Farm JOOSTENBERGS KLOOF 474, PAARL • 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	EAP response: Noted

		• Portion 0 of Farm JOOSTENBERG VLAKE 724 PAARL • Portion 4 of Farm JOOSTENBERGS KLOOF 474, PAARL Supporting documents submitted with the application: • Traffic Impact Assessment Report - (App-24-CWA-Transport-Impact-Assessment web.pdf) • Application Cover Letter - (CWA IAP Letter March25.pdf) • Environmental Impact Assessment Report - (CWA-draft-EIAR-18-March25-web.pdf) • Application Cover Letter - (email correspondence.pdf) The matter is receiving attention, and further communication will be addressed to you as soon as circumstances permit.	
365	B van Koersveld. – Spot on Civil Services	Email dated 19 March 2025: 1. Thank you for keeping me informed. Should I be available I most certainly would like to attend your open day.	Email response provided by EAP 19 March 2025: 1. Thank you for the email. Hope to see you at the open day
366	Councillor Rhynhardt Bresler - Councillor Ward 102 – City of Cape Town	Email dated 19 March 2025: 1. I take note of the mail. Thanks. At this stage I don't have any objections or inputs.	Email response provided by EAP 19 March 2025: 1. Thank you Cllr Bresler
367	Vuyiseka Mzukwa	Email dated 19 March 2025: 1. Noted we will be there	Email response provided by EAP 19 March 2025: 1. Thank you for letting me know
368	Lourens de Bruyn	Email dated 19 March 2025: 1. Is this public participation limited to the water course or the entire project?	Email response provided by EAP 19 March 2025: 1. The public participation is for the entire project scope, as described in the amended draft EIAR Section 6.
369	Hayley Carelse	Email dated 19 March 2025: 1. I would like to a end the open day on 15 April 2025.	Email response provided by EAP 19 March 2025:

		My details are below: Name: Hayley Carelse Cell no: [REDACTED] Thank you	1. Thank you for the email. There is no need to register beforehand for the open day. You can fill in the attendance register on the day as you enter the venue.
370	Sonja Warnich Stemmet – CoCT Environmental Management Department	Email dated 19 March 2025: 1. Thank you for your email communication below regarding the above matter, this office confirms receipt.	1. EAP response: This comment is noted.
371	Christie Briel – Briel Incorporated	Email from Briel Incorporated to DMRE dated 20 March 2025: 1. We refer to the above and attach hereto letter for your kind attention. Letter from Briel Incorporated to DMRE dated 20 March 2025: APPLICATION FOR A CLOSURE CERTIFICATE IN TERMS OF SECTION 43(3) OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT, 28 OF 2002 (“MPRDA”) ON BEHALF OF COROBRIK (PTY) LTD OVER THE REMAINDER OF JOOSTENBERG VLAKE (NOW PORTION 23), NO 724 AND THE REMAINDER OF JOOSTENBERG KLOOF 474, MAGISTERIAL DISTRICT CAPE TOWN, WESTERN CAPE PROVINCE 1. We refer to the above matter as well as our letter dated 8 November 2023, a copy of which is annexed hereto for ease of reference. 2. As outlined in the attached letter, Corobrik (Pty) Ltd (“Corobrik”) is in the process of applying for a closure certificate in respect of its mining right area held under WC311MR, covering the remainder of Joostenberg Vlake (now Portion 23), No. 724 and the remainder of Joostenberg Kloof 474, Magisterial District Cape Town, Western Cape Province (“the mining right area”). 3. We confirm that this application for closure is being submitted in accordance with Section 43 of the Mineral and Petroleum Resources Development Act, 28 of 2002 (“MPRDA”), which requires that:	EAP response: this letter to DMRE is noted and recorded as part of the closure process for the Corobrik Quarry. No response by the EAP is required at this point. Quarry closure plan status: Public participation on the closure plan has been completed and will be submitted to DMRE for decision making during July 2025.

		3.1. The holder of a mining right must apply for a closure certificate upon cessation of mining activities; 3.2. The holder remains responsible for any environmental liability, pollution, or ecological degradation until the Minister issues a closure certificate; and 3.3. The application for closure must comply with the prescribed closure plan, which must include rehabilitation, decommissioning, and mitigation measures as required under Sections 43(3) and 43(4) of the MPRDA. 4. As Corobrik and Cape Wineland Aero (“CWA”) have entered into a commercial agreement for the purchase of the mining right area, with the intention of developing the Cape Wineland Airport, and as this agreement imposes specific obligations on Corobrik regarding the status of the property prior to transfer, it has been necessary to structure the closure plan in alignment with: 4.1. The anticipated development of the Cape Wineland Airport; 4.2. The engineering design specifications provided by the property developer; and 4.3. The legal requirements prescribed under Section 43 of the MPRDA and its associated regulations. 5. Following the submission of our letter dated 8 November 2023, various consultations and negotiations have taken place between Corobrik and CWA regarding the rehabilitation requirements under the MPRDA and the practical considerations for mine closure. 6. Pursuant to these negotiations, an alternative agreement has been reached between Corobrik and CWA, which includes, inter alia, the following key terms: 6.1. Corobrik shall: 6.1.1. Conduct rehabilitation of the mining area to the satisfaction of the Department of Mineral and Petroleum Resources (“DMPR”), in compliance with Section 43(1) of the MPRDA; 6.1.2. Ensure that the rehabilitation and closure process complies with the specifications and details outlined in Zutari Drawing A89083 and is done in accordance with Regulation 57(2) of the MPRDA	

		Regulations, which prescribes the minimum rehabilitation standards; and 6.1.3. Retain all topsoil on site, including the visual berms on the western side of the existing quarry, as part of the ecological rehabilitation strategy required under Section 43(3) of the MPRDA. 7. CWA has accepted and agreed that the completion of the rehabilitation works in accordance with Zutari Drawing A89083 shall constitute compliance with Corobrik's mine closure obligations under this agreement and within the scope of Section 43 of the MPRDA. 8. A copy of this agreement is annexed hereto for informational purposes. 9. Following the execution of this addendum to the original agreement, Corobrik initiated a tender process for the rehabilitation works required under Section 43(4) of the MPRDA, ensuring that all rehabilitation obligations are undertaken by a competent and qualified contractor. The tender was successfully awarded to Lulenco Plant Hire on 25 February 2025. A copy of the agreement detailing the scope of work to be conducted on-site, as agreed upon by the parties, is annexed hereto. 10. As part of the ongoing closure process, we confirm that regular environmental audits will be conducted during and after the rehabilitation works to ensure that the closure objectives are met and that rehabilitation is carried out in full compliance with the requirements of the MPRDA and its regulations, particularly those outlined in Sections 43(5) and 43(6) of the MPRDA, which provide for the verification and certification of closure activities. 11. Furthermore, we confirm that the updated closure plan, incorporating the details stated above, will be included in the public participation process, as prescribed under Regulation 57 of the MPRDA Regulations. All comments and concerns raised during this process will be addressed in accordance with the legally prescribed environmental and public consultation standards. 12. Please note that the process under the National Environmental Management Act 107 Of 1998 ("NEMA") for the Cape Winelands Airport, conducted by PHS Consulting under DEA&DP Ref No. 16/3/3/2/A5/20/2046/24, has included the future use of the quarry as per the Zutari Drawing A89083. The Environmental Assessment Practitioner ("EAP") confirmed that the DMPR has been notified	

		and included throughout the NEMA process inclusive of the most recent 19 March 2025 to 13 May 2025 Public Participation Process. Various Organs of State has commented on the application since November 2023, and the EAP confirmed that no objections were received regarding the proposed future use of the quarry as a stormwater facility 13. Upon completion of the public participation process, the final closure application, together with all supporting documentation, evidence of rehabilitation, and environmental audit reports, will be submitted to the DMRE for evaluation, further instructions, and/or recommendations. 14. We trust that this correspondence is in order and kindly request that you acknowledge receipt of this letter. Additionally, should there be any further requirements or considerations necessary to facilitate the final closure of the mining right area, we kindly request that these be communicated to us at your earliest convenience. <i>Attached to the above letter Briel Incorporated included their letter to DMRE dated 8 November 2023 (please refer to comment nr 1 in the Pre-Application Phase C&R report) as well as the 'Addendum to Agreement of Sale and Cessation and Delegation Agreement' between CWA and Corobrik – please refer to Appendix K of Appendix 40 to the EIAR.</i> Follow-up email from Briel Incorporated to DMRE dated 1 April 2025: 1. We refer to the above as well as our email below and confirm that we have not yet received an acknowledgment of receipt of the attached correspondence. We again attach hereto the letter as previously sent for your convenience and request that you kindly acknowledge receipt of the letter and further confirm that you are in agreement with the content of the said letter. If you have any alternative and/or additional requirements that we need to adhere to, please inform us accordingly. We trust that you find this satisfactory and look forward to hearing from you at your earliest convenience.	

		Email from DMRE to Briel Incorporated dated 4 April 2025: 1. See the attached acknowledgement Letter received via email from DMRE to Briel Incorporated dated 4 April 2025: RE: APPLICATION FOR A CLOSURE CERTIFICATE IN TERMS OF SECTION 43(3) OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT, 28 OF 2002 ("MPRDA") ON BEHALF OF COROBRIK (PTY) LTD OVER THE REMAINDER OF JOOSTENBERG VLAKTE (NOW PORTION 23), NO 724 AND THE REMAINDER OF JOOSTENBERG KLOOF 474, AGISTERIAL DISTRICT CAPE TOWN, WESTERN CAPE PROVINCE 1. Your letter dated 20 March with regards to the above-mentioned subject has been received and is being acknowledged. The Department agrees with the content of the said letter. 2. When applying for closure, you need to submit the DME 270 form and accompanying documentation in terms of regulation 55, 60 and 62 namely: • closure plan • environmental risk report and • final performance assessment report 3. The above-mentioned documents must be consulted with other State departments (City of Cape town Municipality, Cape Nature, Department of Agriculture, Department of Water and Sanitation and the Department of Environmental Affairs and Development Planning). Proof of such consultation and all comments must be submitted to the Department.	
372	VDS Brink	Email dated 20 March 2025: 1. Sal graag die opedag wil bywoon. As gewese lugbemanningslid is lugvaart na aan my hart. Jammer maar ek is deurmekaar met afkortings. Wat is 'n "IAP"? En jou BSc Honneurs in Geologie, twee van ons! Email reply dated 20 March 2025:	Email response by EAP 19 March 2025: 1. Thank you for the email. IAP is the abbreviation for Interested and Affected Party. Looking forward to meeting you at the open day

		2. We shall be there, promised!	
373	Drakenstein Municipality	Email dated 20 March 2025: 1. ACKNOWLEDGEMENT OF RECEIPT (REF 2254476) Drakenstein Municipality acknowledge receipt of your correspondence received on 2025-03-19. The matter has been referred to the responsible department/s for the necessary attention. POPIA NOTICE In terms of the Protection of Personal Information Act 2013 (POPIA) Drakenstein Municipality processes your personal information as needed to establish and maintain a business relationship with the Municipality. Please note that your personal information may be shared where Drakenstein is legally obliged to do so or only to the extent necessary, to perform its functions and render services in relation to the purpose for which such information was collection. This may include processing of personal information by Drakenstein service providers and other stakeholders where required.	1. EAP response: This comment is noted.
374 & 401	Norman Pelman – Local Resident & Joostenbergvlakte Pro Development Group		Email from EAP to IAP dated 20 March 2025: Just want to check something with you please. Paul mentioned that in your conversation last week you said you had sent recent comments on the proposed project? Were these comments sent to me or Olivia and if so, can you please resend them to me?
		Email reply from IAP dated 20 March 2025: 1. These comments were sent to you. Please see attached email thread	Email response provided 20 March 2025: 1. Thank you for the reply Norman I see both your messages today landed in my spam folder and I managed to pull them out. I cannot see where we received the one in Jan25, but I will try to trace it with Olivia when she is back in office.
		Email from IAP dated 4 January 2025: As a pro development group I would like to bring to your attention the following: As we all know the Joostenbergvlakte Community Forum are presenting themselves in public as the body representing most of the Joostenbergvlakte residents. The JCF	EAP response to email dated 4 January 2025: The comment is noted.

		opposes the Cape Wineland Airport application and the EIA process followed to date. It is my intention to balance the voice of the Joostenbergvlakte residents by sending a formal comment to the consultants handling the EIA as part of the current 30 day consultation period taking place between 13 Nov and 13 Dec. This has now been extended to a late comment input. My intent is to confirm that our group consisting of pro development and in favour of the new airport, support the CWA development and that we are satisfied with the EIA process followed to date and that the studies conducted have been informative and satisfactory for interpretation. I will state that we distance ourselves from the JCF's position and that they don't represent everyone in the community. For those of you that don't support this position pls let me know privately by COB on the 10th Jan. Thereafter I'll send this comment to the consultants handling the EIA.	
		Email dated 24 April 2025: At the latest open day meeting we were informed to request a list from you as to who's names appeared on the objection list sent in from JBV community forum. (Karen or Susan or Dr Gale) If my name is shown then I will be taking action against the chairman or trustees as it is fraudulent to use my name without my permission. Please send the list for our perusal. Email reply dated 24 April 2025: Thank you.	Email response provided 24 April 2025: I am unfortunately not able to share the whole list with you due to the POPIA requirements, but we checked the full list on our side, and I can confirm that you were not registered as part of the JBV community forum submission.
375	Stephanie Barnardt - Heritage Western Cape	Email dated 20 March 2025: Please can you provide me with HWC reference number for me to provide you with a comment. If there was no NID trigger, please not that HWC cannot comment on matters that do not form part of our mandate.	Email response by EAP 20 March 2025: We are notifying HWC as part of the EIA requirement, but you have already given comment and the HIA has been endorsed (see attached) (<i>refer Appendix B (C375) to this C&R Report</i>). If you see no need for further comment please let me know.
376	JP van Tonder – Stellenberg NG Kerk	Email dated 21 March 2025: As an interested and affected party, we as the Stellenberg NG Kerk, don't have any objections or negative comments against the proposed expansion of the Cape Winelands Airport. We support the project and wish you well.	Email response by EAP 24 March 2025: Thank you for the email. We will record it in the next Comments and Responses report

377	DEADP EIA Admin	Email dated 24 March 2025: 1. Attached please find the correspondence from this Directorate concerning The Cape Winelands Airport, various Farms Fisantekraal, Durbanville. Letter received via email dated 24 March 2025: ACKNOWLEDGEMENT OF RECEIPT OF THE REVISED 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 FARM NO. 474, PORTION 3 OF THE FARM NO. 474 AND PORTION 4 OF THE FARM NO. 474, FISANTEKRAAL, DURBANVILLE 1. The revised draft EIA Report and supporting documentation, received by this Directorate via electronic mail correspondence on 19 March 2025, refers. 2. This letter serves to acknowledge receipt of the aforementioned documents by this Directorate. 3. This Directorate will consider the revised draft EIA Report and supporting documentation within the prescribed time period and advise you accordingly. 4. You are reminded that it is an offence in terms of Section 49A of the NEMA for a person to commence with a Listed Activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity. 5. Kindly quote the abovementioned reference number in any future correspondence in respect of this application. 6. This Directorate reserves the right to revise or withdraw its comments and request further information from you based on any information received.	The response letter from DEA&DP is noted by the EAP.
378	Danie Ras Risk - Manager County Fair	Email dated 24 March 2025:	Email response by EAP 24 March 2025:

		1. This was brought to my attention by Mr Berry, I would like to register to attend the meeting on the dedicated day.	1. There is no need to register before the open day. You are welcome to attend at any time during the day between 13h00 and 20h00 and you can register at the door as you arrive.
379	Linda Weber – Nu Generation Homes	Email dated 24 March 2025: 1. I THANK YOU for this email. I will be away BUT as you know I will always approve this development. I have recently joined an Estate Agency. I no longer work as a principal estate agent. In the near future if any rental agents expertise are required then let us know please. I do have a client wanting to open a KFC franchise. I did speak to Deon about it. I will insert the company details below in my signature, but you can always make contact on this address if need be. Do I need to forward these details to someone else and if so kindly let me know please as I am not sure if Mark is doing the rental agreements for the franchises? Your help and advice will be greatly appreciated. Email reply dated 24 March 2025: 2. THANK YOU AMANDA, For this info	Email response by EAP 24 March 2025: 1. Thank you for the email Linda. Please use the CWA website registration option to register as a supplier.
380	Andries Louw - Durbanville Landbouvereniging	Email dated 24 March 2025: 1. I hope this letter finds you well. Please find attached letter from Durbanville Landbouvereniging with regards to the Proposed Winelands Airport.	Email response by EAP 24 March 2025: 1. Thank you for the email and attached letter
		Letter received via email dated 24 March 2025: The Honourable Premier Alan Winde Premier of the Western Cape Dear Premier Winde 09 October 2024	EAP response: the Transport Impact Assessment considers future upgrades of roads in the vicinity of the proposed CWA project. Maintenance of these and other roads in the vicinity remains the responsibility of CoCT.

		The Building of the Cape Winelands Airport and Gravel Roads 1. I write to you on behalf of the Durbanville and Philadelphia Landbouverenings, to express a real concern about the on-going poor condition of the gravel roads in our areas. These roads require frequent maintenance by the City of Cape Town's Road Departments. However, it is understood that the department is under-resourced, so is not able to attend to the grading of these roads as and when their condition has deteriorated to the extent that they need to be graded.	
		2. At a meeting on 4 June 2024, which was convened by the above-mentioned farmers' associations, Mr Deon Cloete, the CEO of the Cape Winelands Airport, gave an insight into the development and construction of the airport and all the attendant facilities. At the meeting, farmers expressed a deep concern, because of damage that will be caused to the gravel roads, as a result of the passage of numerous, heavily laden vehicles, making use of these gravel roads, en-route to the Cape Winelands Airport site, when delivering gravel, ready-mix concrete and other resources.	EAP response: the concern raised at the meeting on 4 June 2024 is noted. Response from specialist: As per Section 8 of the TIA, we recommended that construction vehicles use the surfaced road network (via Vissershok Road) instead of the gravel road network (via Malanshoogte Road) due to the poor condition of the gravel roads. This recommendation is based on the fact that both travel time and distance via the gravel road network are greater than via the surfaced road network. Therefore, a construction management plan must be developed to ensure that haulage routes make use of the surfaced road network. In addition, trips between the quarries and the airport should be scheduled outside of peak periods to avoid congestion along the surfaced roads.
		3. As the Chairman of the Durbanville Landbouvereniging, I was tasked to bring these concerned to your attention and request that action be taken soon to address the issue. One would believe that the Western Cape Authorities and the Cape Winelands Airport should partner to finance the surfacing/taring of at least Malanshoogte (1,8km), Spec Bona and Occultdale Roads, which provide the most direct routes to the Cape Town Airport site for the delivery (from local quarries) of gravel, concrete and tar, all of which will be needed in abundance, during the construction phase of the airport.	EAP response: The EMP and EIAR include the following requirements: - construction vehicles should use the surfaced road network instead of the gravel road network due to the poor condition and longer travel time on the gravel roads. - trips between the quarries and the airport should be scheduled outside of peak periods to avoid congestion along the surfaced roads

381	Ayesha Hamdulay - DEADP	Email from DEADP to CWA dated 14 March 2025: 1. I trust you are well and remain safe. Please find attached the Department's correspondence with respect to the proposed expansion of the Cape Winelands Airport.	Email response by EAP 25 March 2025: The letter received from you on 14 March 2025 as attached refers. Herewith please find the response from the CWA specialist to the comments raised in your letter. The EAP will also record it in the Comments and Responses report. Please forward this response to the relevant internal planning department. Note: the final submission date of 21 August 2025 in the attached letter has been corrected to 29 August 2025 in subsequent email correspondence between the EAP and DEA&DP.
		Letter received via email dated 14 March 2025: FURTHER COMMENTS ON THE APPLICATION 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) FOR 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 FARM NO. 474, PORTION 3 OF THE FARM NO. 474 AND PORTION 4 OF THE FARM NO. 474, FISANTEKRAAL, DURBANVILLE	-
		1. The draft EIA Report and supporting documentation, received by this Directorate via electronic mail correspondence on 13 November 2024, the correspondences from this Directorate acknowledging receipt of the draft EIA Report (dated 22 November 2024), and the correspondences from this Directorate providing comments on the draft EIA Report (dated 30 December 2024), refer.	Letter response provided 25 March 2025: <u>Letter from H&A Planning to PHS Consulting dated 24 March:</u> RESPONSE TO "FURTHER COMMENTS" BY DEADP INTERNAL LAND USE PLANNING REGARDING MOTIVATING INCONSISTENCIES OF THE CWA PROPOSAL WITH THE MSDF"
		2. This Directorate hereby provides the following information with regard to the development proposal in terms of the internal landuse planning comments that were obtained:	The letter sent by DEA&DP "FURTHER COMMENTS ON THE APPLICATION SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998..." under reference 16/3/3/2/A5/20/2046/24 dated 14 March 2024 has reference.
		2.1. The proposed development is broadly consistent with the spatial strategies of the City of Cape Town, as it represents a private investment to establish a new economic and transport hub. It will contribute to	In this letter that applicant is, inter alia, advised that DEA&DP's internal land use planning commented that the proposed development is broadly consistent with the spatial strategies of the City of Cape Town but as the

		creating and attracting investment that will facilitate economic growth and employment opportunities, whilst addressing the need for improved aviation services within the City of Cape Town.	proposed development falls partially outside of the Urban Development Edge, the consistency with or deviation from the MSDF must be motivated. The DEA&DP's internal land use planning also requested that further comments must be obtained from the relevant City of Cape Town regarding the various deviations. DEA&DP's internal land use planning requested similar information in correspondence dated 30 December 2024. This latter request was discussed in a virtual meeting with DEADP's Environmental Impact Management Services on 19 February 2025 where the concerns listed below were set out by me. DEADP's internal land use planning was not present at that meeting which perhaps explains why the issue seems to be unanswered. My concerns in complying with these requests are as follows: 1. <u>Legal context and background.</u> Par 2.5 of the DEA&DP letter of 30 December 2024 refers to a detailed motivation for the deviations "as required" in terms of s.22 of SPLUMA. The CoCT is the competent authority for municipal planning as set out in Part B of Schedule 4 of the Constitution. In this context, the City used its legislative power to adopt its own Municipal Planning By-law (MPBL). The land-use applications that will be submitted to the CoCT will be in terms of the MPBL and not ito SPLUMA. The MPBL is aligned with SPLUMA and contains a similar provision to SPLUMA's s.22, but the MPBL prescribes the process to be followed in section 9. Section 9 of the MPBL read as follows:
		2.2. Notwithstanding the above, the proposed development falls partially outside of the proclaimed Urban Development Edge, and therefore the consistency with or deviation from the Municipal Spatial Development Framework ("MSDF") (2023) must be motivated for, as far as possible.	
		3. In view of the above, please be informed that although no objection to the proposed development was provided from a Provincial town planning perspective, it is hereby requested that the following matters be addressed –	
		3.1. Please ensure that all the matters of in/consistency with or deviation from the MSDF and all other applicable Municipal forward planning policies be suitably motivated within the context of your Scoping and EIA application. Note that this information was similarly requested by this Directorate in correspondence (dated 30 December 2024).	
		3.2. Further comments must be obtained from the relevant City of Cape Town's Planning components regarding the various departures/deviations from the relevant forward planning, and any requirements that must be taken into account by this Directorate when deciding your Scoping and EIA application in terms of the NEMA and EIA Regulations, 2014 (as amended). Note that all comments obtained must be addressed and adequately responded to and proof thereof provided to this Directorate.	

			9 Status of the municipal spatial development framework (1) Subject to section 22, the City may deviate from the provisions of the municipal spatial development framework only if site specific circumstances justify the deviation. (2) In determining whether the site specific circumstances exist, the City must have regard to the development application that has been submitted and any other relevant considerations. (3) If an application is inconsistent with the municipal spatial development framework, the applicant must describe the inconsistency in – (a) the application; and (b) the advertisement of the application. (4) The municipal spatial development framework does not confer or take away rights. 2. The City's process to deal with inconsistencies with the MSDF. As prescribed in its MPBL, any inconsistencies with the City's MSDF must be described in land-use applications and then be specifically referenced in the advertisement of the application. After conclusion of the public participation process to the MPBL, the City officials make their recommendation to the Municipal Planning Tribunal. 3. The City of Cape Town's response to the deviations from the MSDF. Regarding obtaining from the City departments on the deviations from the MSDF, the City commented on 29 January 2024 under the heading "Spatial Planning", that "In light of the above, the expansion of existing operations of the CWA application for amendment of approvals (existing) will need to follow due process for deviation from the MSDF and DSDF, as prescribed in the MPBL" (accents added). This "due process" is described under item 2 above. In considering the desirability of a proposed use, the City must inter alia apply its mind to the impact on the biophysical environment. Whereas it is common cause that an EA is not required for the City to do so, the City requires similar information to what would be contained in the Final EIAR. The land-use application will therefore be submitted shortly after the completion of the Final EIR. 4. Procedural concern.

			The MPBL process may be vulnerable to legal challenges should City officials adopt a formal position on whether deviations from its municipal planning policies are justified prior to following the public participation process as prescribed in MPBL. I asked the opinion of Ms Terry Winstanley, an expert in environmental law, who confirmed that this a legitimate concern. See the attached letter dated 19 March 2025. It is understandable that DEA&DP wishes to get the City's position on the inconsistencies with the MSDF. But DEA&DP is respectfully reminded that the MSDF and land-use planning applications, including whether inconsistencies from the MSDF are justified or not, are exclusively municipal planning matters. The integrity of both the MPBL and the NEMA processes must be protected. In asking for the motivation of deviations from municipal spatial policy, it creates the perception that DEA&DP may want to consider a municipal planning matter in the NEMA process. Should that be the case, it would be of concern. 5. Proposed way forward The proposed CWA expansion's alignment with spatial policy and the aspects where it is not aligned are described in the Draft EIAR's specialist report (App-36-CWA-in-the context-of-Spatial-Policy-and-Land-Use-Rights – March 2025). This appendix to the Draft EIAR also addressed how and when the motivations for justifying site-specific deviations from the MSDF will be made. This assessment has been highlighted in the March 2025 Draft EIAR itself on pp 132 to 133 and again on pp 164 to 165. The proposal's alignment and deviations from spatial policy have been clearly described and the process to deal with that prescribed in law. Ms Terry Winstanley, an expert in environmental law, suggested that DEA&DP records in any decision that it makes under NEMA that it will defer to the MPT on municipal planning, including whether site-specific circumstance exist which may or may not justify deviations from the MSDF. <u>Letter from Winstanley Inc Environmental Law to H&A Planning dated 19 March 2025:</u>

			Cape Winelands Airport Environmental Impact Assessment: DEA&DP's Query Concerning Municipal Planning Issue 1. I refer to: 1.1. The comment received from the Department of Environmental Affairs and Development Planning ("DEA&DP") in the above-mentioned application dated 14 March 2025 ("Comment"); and 1.2. Your letter of 17 March 2025 requesting guidance on the response to the Comment. 2. I was initially not sure how to understand DEA&DP's request for a motivation regarding the application's partial deviation from the Municipal Spatial Development Framework ("MSDF"). It is possible that DEA&DP was simply flagging an issue that needs to be addressed. However, the request that the partial deviation be motivated in the scoping and EIA suggests that DEA&DP must itself, be satisfied about this planning issue. You are concerned about this. 3. As you know, the Constitution of the Republic of South Africa, 1996 ("Constitution") allocates legislative and executive responsibility for different issues to different spheres of government. It imposes an obligation on provincial governments to promote the development of local government capacity to enable municipalities to perform their functions and manage their own affairs (section 155 (6)(b)). 4. In determining what constitute the powers and functions of local government, reference must be had to section 156 of the Constitution, read with Schedules 4 and 5. Included in matters that fall exclusively within local government competence is "municipal planning" (section 156(1)(a) read with Part B of Schedule 4). 5. The extent to which a development complies with the MSDF (and where it does not, whether site specific circumstances justify a deviation from the MSDF) are clearly municipal functions. In the context of this application, they are issues that must be determined by the Municipal Tribunal ("MPT") of the City of Cape Town ("City").

			6. DEA&DP has asked you for comments from the City on this issue. You are concerned that any views expressed by the City in the environmental impact assessment (“EIA”) process may be regarded by opponents of the project as the City prejudging the applications to be made under the City’s Municipal Planning Bylaw, 2015 (“Bylaw”), or improperly influencing those decisions. That may make any decision made by the MPT vulnerable to attack on appeal or review. I think your concern is legitimate. 7. I assume that the City is aware of the EIA process because it would have been notified as an interested and affected party (as is required by the Environmental Impact Assessment Regulations, 2014). I also assume that if DEA&DP is asking for comment from the City, then it has not already provided one, quite likely because it is reluctant to express a view that may compromise the land use applications to be made under the Bylaw. 8. I suggest that you respond to the Comment by explaining these concerns to DEA&DP. Perhaps it could be suggested to DEA&DP that the motivation which it seeks will be fully made to, and determined by, the MPT. 9. In the case of Fuel Retailers Association of South Africa (Pty) Ltd v the Director General, Environmental Management, Mpumalanga and Others ((2007) ZACC 13) the Constitutional Court considered the environmental impact assessment process and what issues should be considered by local government; what factors are within the provincial government’s remit; and what considerations are overlapping. In the case of City of Johannesburg Metropolitan Municipality v Gauteng Development Tribunal and Others (2010 (6) SA 182 (CC) the Constitutional Court confirmed that municipal planning is unarguably a local government function. A possible resolution of this matter would be for DEA&DP to record in any decision that it makes on the application under the EIA process that that it will defer to the MPT on municipal planning. In that way, DEA&DP will have noted its concern about compliance with planning instruments in the EIA process but will not overstep its Constitutional mandate. That approach would be entirely consistent with the case law referred to above.

		4. Please be reminded that the final EIA Report must be submitted to this Directorate no later than Thursday, 21 August 2025.	EAP response: This date has been corrected by DEA&DP in subsequent communications to 29 August 2025.
		5. In the event that the final EIA Report is not received within the specified timeframe, the application will lapse in terms of Regulation 45 of the EIA Regulations, 2014 (as amended), and the file will be closed. Should you wish to continue with the proposed development, a new application for Environmental Authorisation must be submitted to the Directorate for consideration. Please note that should an application fee be applicable; this must be paid prior to submission of the application for Environmental Authorisation.	EAP response: Noted
		6. It is an offence in terms of Section 49A of the NEMA for a person to commence with a Listed Activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity.	EAP response: Noted
		7. Kindly quote the abovementioned reference number in any future correspondence in respect of this application.	EAP response: Noted
		8. This Directorate reserves the right to revise or withdraw its comments and request further information from you based on any information received.	EAP response: noted
382	Asavela Siqangwe - Afrimat	Email dated 27 March 2025: 1. I trust that you are well. May you kindly register me as an Interested & Affected Party for the Cape Winelands Airport application to be kept abreast of the application process?	Email response by EAP 27 March 2025: 1. We will register you as an IAP for the proposed project.
383	Derek Lawson - Joostenbergvlakte Pro Development Group	Email dated 27 March 2025: 1. I herewith inform that not only shall I be attending the PUBLIC OPEN DAY ON 15 APRIL 2025, but that there is a large Pro-Development grouping residing in Joostenbergvlakte that are supportive of the CWA.	Email response by EAP 27 March 2025: 1. Thank you for the email and I look forward to meeting you at the open day. Please see below responses (in blue) from the Transport specialist to your queries:

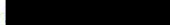
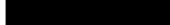
		Look at any map and it's clear, the Lucullus Road (CoCT have plans to upgrade this road to a Class 2 Arterial) offers the perfect direct link between the CWA and the N1.	
		Question 1: Does the CWA consider Lucullus Street to be a necessary and important transport link between CWA and N1?	Question 1: Does the CWA consider Lucullus Street to be a necessary and important transport link between CWA and N1? Response: Lucullus Road will be an important link within the road network to access the CWA in future. However, Lucullus was not assessed as a requirement to accommodate airport traffic only. Alternative routes exist to link the airport with the external road network (e.g. the N1). Upgrades to the network is therefore recommended to improve existing routes although the implementation of Lucullus will alleviate traffic along these routes in future.
		Question 2: Is it not in the CWA best interest to have CoCT commence with building Lucullus Street to its planned Class 2 Arterial, "the ultimate scheme", asap?	Question 2: Is it not in the CWA best interest to have CoCT commence with building Lucullus Street to its planned Class 2 Arterial, "the ultimate scheme", asap? Response: Yes. Lucullus Road will be an important link to support the overall road network – not only for the airport, but also to accommodate future developments in the area. Lucullus will be constructed as a Class 2 Primary arterial once the Environmental Authorisation has been approved.
		Email reply dated 27 March 2025: 2. Wow Amanda. Thank you for the incredibly quick and informative response. Enjoy the day.	
384	M H Scott - TERRAPLAN ASSOCIATES	Email dated 28 March 2025: 1. Bogenoemde aansoek verwys. Verder tot die advertensie soos verskyn het in Die Burger op 19 Maart 2025 wens ek hiermee ter versoek om hierdie kantoor asseblief te registreer as belanghebbende en geaffekteerde party. Ons kontakbesonderhede is as volg: Mnr M H Scott Epos adres: [REDACTED]	Email response by EAP 28 March 2025: 1. Thank you for the email. We will register you as IAP for the proposed project

385	Natasha Bieding - DEADP	Email dated 2 April 2025: 1. Please may you assist with regards to the application, i.e.: 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 Kindly would you direct me to where I can find all the comments from CapeNature received to date? I cannot seem to locate it in the batch of information submitted together with the revised draft EIA Report. In this regard, please be reminded that copies of all comments obtained should have been provided together with revised draft EIA Report. Please may you also provide the latest agreements with regards to signed offset agreements? A response at your earliest convenience will be greatly appreciated due to the information required for a presentation. Please be reminded that all information placed before the Competent Authority should have been circulated to I&APs & relevant stakeholders as well, unless otherwise specified.	Email response by EAP 3 April 2025: 1. CapeNature has been included as a commenting authority from the onset of this S&EIA process and has been notified of all rounds of public participation. We have received two rounds of comments from CapeNature during the Scoping and Environmental Impact Assessment process to date: • The first round of comments (dated 8 December 2023) was received during the Pre-Application Scoping Phase. This is recorded as Comment 88, found on pages 215–218 in Appendix 29A. • The second round of comments (dated 10 January 2025) was received during the In-Process EIA Phase. This is recorded as Comment 338, found on pages 402–406 in Appendix 29C. The C&R reports are a true reflection of all comments received with responses per comment as needed. Copies of all comments received during the pre-application and in-process Scoping Phase was provided to DEA&DP with the final Scoping submission on 6 September 2024 (Appendices 33A and 33B of that final submission). Additionally, CapeNature requested Google Earth KML files or QGIS shapefiles of the development footprint on 14 November 2023, which were provided the same day by PHS Consulting. This interaction is documented as Comment 20, located on page 128 in Appendix 29A. As stated above, all comments received throughout the S&EIA process have been included and responded to in the relevant Comments and Response Reports (Appendices 29A, 29B, and 29C). Copies of the original comments will be provided to the Competent Authority upon final submission of the EIAR (inclusive of those already provided). The signed offset agreement was provided to DEA&DP on 13 November 2024 (see attached again). This has not changed, and as previously explained it contains sensitive information that cannot be shared in the public domain. Based on DEA&DP comments received, the Biodiversity offset report circulated to the public as part of the draft EIAR 13

			November to 13 December 2024, was amended to include more detail (as underlined) and this is appended to the amended draft EIAR as Appendix 11. It is also included as Annexure 18 to the EMPr (refer page 485 of Appendix 39B Annexures 10 – 20 web). The Wetland Offset Study and Implementation Plan is included as Annexure 7 to the EMPr, available on page 137 of Appendix 39B Annexures 1 to 9 web. The signed Memorandum of Understanding is provided as Appendix J3 to the Wetland Offset Study and Implementation Plan, located on page 277 of Appendix 39B Annexures 1 to 9 web. Please let me know if you need any additional information to assist with your presentation. NOTE: The signed Terrestrial Offset agreement between the landowner and applicant is commercially sensitive and will not be included in this C&R.
		Email reply dated 4 April 2025: 2. Thank you for the assistance. Would it be possible to send me separate pdf copies of the comments and letters as received from CapeNature to date? The Panel's coordinator will require it in this format for her own records. I look forward to your response.	Email response provided 4 April 2025: 2. Please see attached the two rounds of comments received from Cape Nature to date. Please feel free to let me know should you required any additional information.
386	Nkhensani Masondo – JUWI Renewable Energies	Email dated 3 April 2025: 1. The notice of public participation for the proposed expansion of the Cape Winelands Airport (DEA&DP Ref No.: 16/3/3/2/A5/20/2026/24) refers. Could you kindly register the following individuals as Interested and Affected Parties for the proposed: - Nkhensani Masondo – [REDACTED] - Matthew Ellero – [REDACTED]	Email response by EAP 3 April 2025: 1. Thank you for the email. You will be registered as IAPs for the proposed project.

		Monique Beukes Daniels - [REDACTED]	
387	Zaliah Stoltenkamp - Impenthana Projects and Maintenance	Email dated 2 April 2025: - Trust this email brings you in good spirit and health. I would like to attend the opening day at Goedgeleeven Venue, Klipheuwel Rd, Durbanville on the 15th of April 2025 No of guest = 2 Email reply dated 4 April 2025: - Perfect we will attend the open day. Hoping to meet with you in person.	Email response by EAP 3 April 2025: Thank you for the email. There is no need to pre-register for the Open day on 15 April. You can attend any time between 1 to 8pm on the day, and you will be asked to complete an attendance register at the entrance to the venue on the day.
388	Lauren le Grange - Richard Summers Inc. on behalf of Garden Cities	Email dated 1 April 2025: - The above ma er and the amended in-process draft EIAR refers. Our copy of "Appendix 3: Groundwater Impact Assessment" is of poor quality and somewhat illegible. Could you kindly provide a clearer copy? Email response dated 10 April 2025: - The quality of the document is poor. Kindly find attached a screenshot of one of the pages from the Groundwater Impact Assessment, which illustrates the poor legibility of the text. We are unable to search for specific terms within the document, as Adobe does not recognise the text. Please could you provide us with a readable copy in which the text is clear and accessible at your earliest convenience.	Email response provided 3 April 2025: - Please provide me with more detail on what is illegible in Appendix 3. That would assist me in providing assistance to you. Email reply provided 13 April 2025: - The document is legible on my side and with others I have asked to check it. And the attachment you provide is also legible on my side. I am sending you the document again via a specific Wetransfer link below that will expire in 3 days. Please download and confirm receipt. https://we.tl/t-XPZUb2jvcm Note: The document was downloaded on 14 April 2025. Comments were later received from Richard Summers Inc on behalf of Garden Cities, please refer to Comment 414 below.

		6 Regional Hydrogeology The aquifer yield and aquifer quality classifications are based on regional datasets, and therefore, only provide an indication of conditions to be expected. 6.1 Aquifer Yield According to the 1 : 500 000 scale groundwater map of Cape Town (3318), the study area hosts a fractured aquifer with an average borehole yield in the range of 0.5 – 5.0 L/s (DWAF, 2002) (Map 4). A fractured aquifer describes an aquifer where groundwater only occurs in narrow fractures within the bedrock and is most likely associated with the Tygerberg Formation in the area. 6.2 Aquifer Quality Electrical conductivity (EC) is a measure of the ability of the groundwater to conduct electricity. EC is directly related to the concentration of dissolved ions in the water and this parameter is used as an indication of groundwater quality. The groundwater map indicates that the aquifer has electrical conductivity values in the range of 70 – 1 000 mS/m (Map 5) (DWAF, 2002). Better quality water is observed in the north-western area with values ranging between 70 – 300 mS/m. Poorer water quality is observed in the south-eastern area with values ranging between 300 – 1 000 mS/m (Map 5) (DWAF, 2002). In terms of domestic water standards (DWAF, 1998), water quality in the area ranges from good (Class I) (70 – 150 mS/m) to dangerous (Class IV) (>520 mS/m). 6.3 Aquifer Vulnerability Classification The national scale groundwater vulnerability map, which was developed according to the DRASTIC methodology (Conrad and Munch, 2007), indicates that the study site has a "low" to "medium" vulnerability to surface-based contaminants (Map 6). This vulnerability rating is linked to the host	
389	Martin Coetzee - Dimark	Email dated 3 April 2025: 1. Hope you are well. Please may I request your availability to meet and discuss our airport solutions for Cape Winelands Airport? Please advise a suitable time and I can schedule a meeting via teams for the introduction of our company and solutions to Baggage Handling Systems as well as passenger screening (ATRS – automatic tray return system).	Email response by EAP 3 April 2025: 1. Thank you for the email. I am the independent EAP responsible for the EIA process and not the correct contact for your presentation. If you wish to be placed on the register for the EIA process, please indicate so by return email. Otherwise, please register on the CWA website as a preferred supplier.
390	Annalie Janse van Rensburg	Email dated 5 April 2025: 1. Hi, would like to rsvp fir Teusday 15 April. Could u send a map of the venue please?.	Email response provided 7 April 2025: 1. There is no need to RSVP for the open day. The event is open from 1 to 8pm on the 15th April and you are welcome to join at any time during this period. You will be asked to complete the attendance register at the entrance of the venue on the day

		Email reply dated 7 April 2025: - Hi, is there no other way to send this doc ie pdf or word, as i dont have a PC, so i cant open it. - Hi, according to Google its past the Lichtenburg Rd which turns off to Agter-Paarl & Wellington. Then I continue up to the Willows on the left, then I turn right instead & eventually i will find it. Will u have lunch or dinner for us or only coffee & muffins? Email dated 14 April 2025: - Hi Amanda, I would like to attend tomorrow, but i can't open the programme, as it's to big. Could u give me a brief about the programme, so that I know what would be the best time to come? I don't have a PC & the info u send is to large.	Follow-up email dated 7 April 2025: - Apologies Annalie, I sent the email before attaching the location pin for Goedgeleven Estate. Please see attached as requested The EAP provided a location pin to the IAP. Email reply provided 14 April 2025: - There is no program for the day. It is an open day with the technical team and specialists displaying and then you can attend and interact with anyone in the room as you have questions. So anytime that suits you please attend
391	Carin Pienaar	Email dated 7 April 2025: Please add me as an interested and affected party. Name : Carin Pienaar Address :  Email :  Cell :  Language : Afrikaans Doen dit asb so gou as moontlik!!!	Email response by EAP 7 April 2025: Thank you for the email. You will be added to the IAP register for the proposed project.
392	Michael Dyssel - Department of Geography, Environmental Studies & Tourism University of the Western Cape	Email dated 7 April 2025: May I be registered as an IA&P on the Cape Winelands Airport project please? Is there a direct link to the EIA? I browsed through the draft VIA and was wondering about the mitigation options for the (potential) impacts of Eskom's high voltage lines, the clustering of pylons near the subject site, the Klipheuwel Windfarm and the radio masts closeby on the eventual operations at the CWA. (Apologies if I have overlooked responses to the above in the document).	Email response by EAP 8 April 2025: Thank you for the email. We will register you as an IAP for the proposed project. The direct link to the amended draft EIAR and supporting documentation is https://phsconsulting.co.za/proposed_expansion-of-cape-winelands-airport/

			The Annex 14 OLS (Appendix 17) identifies the obstacles (natural and manmade) within a certain radius from the CWA to investigate their influence on existing or future instrument procedures and whether these obstacles will have any effect on the Annex14 surfaces and operation of the CWA. It will incorporate future obstacles as required. Please have a look at this document. Please let me know if I can be of any further assistance
393	Delfina Correia - Be Made Whole Leadership Institute (Pty) Ltd	Email dated 11 April 2025: - As an interested party, I would like to attend the open day at Goedgeleven Farm on 15 April regarding the Winelands Airport. However, I will only be able to stay until 2:20pm due to other commitments that cannot be moved. Reason for my interest: - Employment opportunities for the residents of Fisantekraal. - The possible issue arising of squatter camps popping up around the airport area due to the opportunities that the airport brings, and how we can pre-emptively put steps in place to stop this from happening.	Email response provided 11 April 2025: Thank you for the email. There is no need to pre-register for the open day on 15 April. You will be asked to register on the day at the entrance to the venue. You can attend any time during the day from 1 to 8pm and leave when you need to. You are welcome to raise these issues with the team present at the open day in order to obtain answers.
394	Susan Rheeder - Joostenbergvlakte	Email dated 14 April 2025: As our Chairman, Karin v Zyl will not be able to attend due to health issues, Dr Gale and myself will attend the meeting tomorrow at 13:30. It is unfortunately the only timeslot we have available as Dr Gale has to be in the Southern Suburbs to attend to her elderly mother and I have a patient at home who is totally dependent on me and I can only be away for maximum 1 hour. I trust it will be in order?	Email response provided 14 April 2025: We look forward to seeing you at 13:30 tomorrow.
395	Jeanne de Waal	Email dated 15 April 2025: We would like to attend the open day and want to know if we must register before the date. If so, I my husband and 2 others would like to attend.	Email response provided 15 April 2025: There is no need to pre-register for the open day. You are welcome to attend any time between 1 and 8 today
		Email dated 16 April 2025:	Email response provided 16 April 2025:

		1. Thank you so much for yesterday it was very informative. What is the lady's name who said that she will forward the rendering of the video that played on the TV yesterday. She said she will forward it to me so I can show my client. I said that I will show it to him and not forward it to anybody.	Please email Deidre on deidre@capewinelands.aero
396	Mughamad Moose	Email dated 20 April 2025: 1. We just hope to be part of this development and alot of people will be busy working earning sumthing for his family then its good for investors with this project a big project like this one .	Email response provided 22 April 2025: 1. Thank you for the email. We will record your comments and also register you as an IAP for the proposed project.
397	Zingisani Moepa	Whatsapp dated 22 April 2025: 1. This is Zingisani Moepa one of the interested groupings on the cape Winelands airport project Please can you tell me is there any other public participation meetings yet to come before the actual construction work begins And do you have any minutes for the last one I could not attend the open day which was on the 15th can you please send an update. In terms of the recruitment of local labor and enterprise do you have any information as how is it gonna be done. My email is	Whatsapp response provided 22 April 2025: 1. Thank you for the message. I will reply via email to your queries in due course Email response provided 22 April 2025: 1. Thank you for the whatsapp sent – I have copied your message in this email below in order for me to respond on email to you. The proposed project is currently out for comment until 13 May, and the documentation is available at the download link https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/ for you to consider and comment should you wish to. We will also register you as an IAP for the proposed project. The proposed construction phase will only follow if authorisation is granted by DEA&DP, and all registered IAPs will be notified of DEA&DPs decision. At this stage no further public participation meetings are planned or scheduled, and due to the format of the open day there is no minutes available. In terms of the recruitment of local labor and enterprise – the process and approach will be developed by the Applicant once the decision by DEA&DP becomes known. You are also welcome to look at the CWA website for opportunities and possibly register at https://capewinelands.aero/opportunities/
398		Email dated 22 April 2025:	Email response provided from CWA:

Ayesha Hamdulay - DEADP	1. I trust you are well and remain safe. Please find attached the Department's correspondence with respect to Have a splendid day. Email reply dated 22 April 2025: 2. I trust you are well and remain safe. Many thanks for pointing out the error in the date of issue, I have corrected the error immediately. Please, therefore find attached this Directorates comments on the revised draft EIA Report (dated 22 April 2025). Have a splendid evening.	1. Thank you for your email and attached letter, I confirm receipt of your letter signed and dated the 22nd of April 2025, the contents of which is noted. We will review your correspondence in detail and respond accordingly on all matters raised. Just on a minor technical matter and typo, we receive the letter on the basis and understanding that the date at the top of your letter is meant to correspond to today's date as well as the date at the bottom of the letter adjacent to your signature, that being the 22nd of April 2025, not the 22nd of April 2024. We trust that you will find this in order.
	Letter received via email dated 22 April 2025: COMMENT ON THE REVISED 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 FARM NO. 474, PORTION 3 OF THE FARM NO. 474 AND PORTION 4 OF THE FARM NO. 474, FISANTEKRAAL, DURBANVILLE	
	1. The revised draft EIA Report and supporting documentation, received by this Directorate via electronic mail correspondence on 19 March 2025, and the correspondence from this Directorate acknowledging receipt thereof (dated 24 March 2025), refer.	EAP response: noted
	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 revised draft EIA Report:	-
	2.1. Biodiversity / Terrestrial Offset Requirements	-

		2.1.1. Biodiversity Offset Report (dated February 2025 and compiled by Mr. Mark Botha)	
		2.1.1.1. It is detailed in the abovementioned Biodiversity Offset Report that “the applicant will submit the signed Landowner agreement to secure the priority site with the Final EIR”. This information must therefore be provided as such.	EAP response: The signed landowner agreement has been previously submitted to DEA&DP and will be submitted again with the final EIAR to DEA&DP.
		2.1.1.2. In terms of applying condition modifiers to the basic offset ratios the reduction of offset ratios below 50% of the basic ratio based on an argument of the condition of the ecosystem on the impacted site being degraded cannot be agreed upon. This principle is in line with the current guidance captured in the 2015 Western Cape Guideline on Biodiversity Offsets. Likewise, the Western Cape Guideline also only allows for condition modifiers to be used to motivate for a reduction in the offset ratio for sites considered to be heavily degraded, but in this instance the ratio is being reduced for moderate condition sites as well. Any reductions in the offset ratio based on a site being in moderate condition is not acceptable, in principle, unless there are valid reasons, otherwise a 1:30 ratio should applied. Hence, such reasons must be provided accordingly.	Specialist response: We acknowledge and appreciate the Department’s comment in section 2.1.1.2 regarding the application of condition modifiers in determining appropriate biodiversity offset ratios. We understand that the concern raised relates specifically to the reduction of offset ratios "below 50%" of the standard (gazetted) ratio, particularly where impacted ecosystems are not considered “heavily degraded.” 1. DEADP’s comment refers expressly to reductions in offset ratios below 50% of the basic ratio, which, in the case of Critically Endangered (CR) ecosystems, equates to less than 15:1 (i.e., 50% of 30:1). This principle is clearly understood and has been respected in the offset calculations. We confirm that: All likely impact areas of remnant vegetation were mapped generously – the actual remnant areas are less than shown in the table. No reduction below 50% of the gazetted ratio was applied to areas classified as being in moderate or moderate-to-poor condition. Only those areas that were explicitly assessed as poor to very poor in ecological condition were assigned modifiers resulting in final ratios below 50%. These remnants have very low prognosis for persisting and almost no opportunity for effective restoration. 2. Use of Condition Modifiers Was Conservative and Justified: The Northern Silcrete Remnant, classified as moderate condition, was assigned a 66% modifier, yielding a final offset ratio of 20:1 —well above the 50% threshold. This site is heavily grazed and shows substantial impact from hoof action and a substantial reduction in structure and function. It cannot be linked to any similar ecosystem remnant to maintain long-term function and species diversity maintenance. The Mown Grasslands, assessed as poor to moderate, were assigned a 50% modifier, resulting in a final 15:1 ratio —
		2.1.1.3. Further to the above, clarification must be provided on whether the proposed offset site contains enough good condition ecosystem to cater for an increased offset ratio.	

			exactly at the threshold outlined in DEADP’s comment. Only deeply degraded patches, such as residual Renosterveld fragments within or overlapping the runway layout, being heavily impacted by invasive aliens and prior evidence of earthworks/ploughing were assessed as poor to very poor and assigned a 33% modifier, producing a final 10:1 ratio. These were determined, using professional ecological judgement, to have crossed the threshold of functional collapse — with minimal ecological value or restoration potential. The final comparison of ratios is provided in Table 1 of the Offset Report. The specialist stands by these proposals. 3. Principled Application Consistent with National and Provincial Guidelines: As outlined in the DFFE 2023 National Biodiversity Offset Guideline, condition-based adjustments are permissible when grounded in ecological evidence. While the Western Cape Guideline (2015) does call for caution, it similarly permits modifiers for heavily degraded areas if adequately motivated. The condition assessments used here were: • Conservatively applied based on site visits and botanical specialist findings; • Aligned with SANBI and DEADP precedents on interpreting ecological viability and persistence; • Intended to ensure offset effort reflects ecological reality, not a rigid numerical standard. • The candidate offset sites are in far better condition than the impact sites, further supporting the use of the proposed exchange rules. 4. Offset Outcome is Substantial, Defensible, and Aligned with Good Practice: The total required offset of 77 hectares was calculated using conservative metrics, incorporates specialist input, and will be implemented through: • Binding landowner agreements; • EMPr-based integration into long-term management; • An endowment-backed fallback to the Endangered Wildlife Trust in the event of noncompliance. • This ensures that real biodiversity value is secured, regardless of technical debate over numeric thresholds.

			- An additional area of approx. 30 ha is available on the preferred site to cater for any perceived deficiency. Therefore, in response to 2.1.1.3 on Offset site containing enough good condition ecosystem to cater for an increased ratio, the answer is yes – although an increased ratio is still not justified. We therefore respectfully submit that: - DEADP's concern about reductions below 50% is addressed and resolved, as no such reductions were applied outside the limited, heavily degraded areas; - The application of the 66% modifier for moderate condition was cautious and scientifically defensible; - The broader offset proposal delivers a credible and meaningful conservation outcome in line with both provincial and national guidance. EAP response: Post comments received from CN on the Terrestrial Offset report, the 77ha calculated offset was increased to 89ha as requested by CN. The EAIR and EMPr will be amended to reflect this as a condition of EA.
		2.1.1.4. Confirmation must be provided on whether the sites requiring offset are inside or outside the Proclaimed Urban Edge of the City of Cape Town, as this affects arguments and motivations around reducing offset ratios. Depending on the confirmation provided, you must provide updated arguments and motivations around reducing offset ratios, where so required.	Specialist response: The offset specialists' understanding is that all the impact sites except the northern most one of 1,7ha, (66% modifier, 20:1 Final ratio) sit within the urban edge. This would provide further rationale for reducing the ratio – if authorities needed it.
		2.1.1.5. It is unclear whether the proposed R8 million penalty is to be used only for managing the offset, or also for securing the offset (via declaration as Nature Reserve/Protected Environment). This information must therefore be made known.	Specialist response: The R8 million penalty is to be used for management as clearly stipulated in the second bullet of the final component of the proposed offset condition of authorisation, viz: "In addition to any other administrative penalties that may be determined, a sum of R8 million becomes immediately payable to the Endangered Wildlife Trust, to establish a, or augment an existing, fund for the management of the offset site and adjacent priority conserved areas in the

			Klipheuwel Corridor not currently in City ownership". The Biodiversity Offset Report will not be amended as clarification on this comment becomes available to IAPs as part of the C&R responses.
		2.1.1.6. As the proposed offset represents reactive stewardship (land ownership will not be transferred), the biodiversity offset report should be amended to remove any responsibility or cost for implementation being assigned to the City of Cape Town. This specifically relates to a conservation servitude being registered in favour of the City of Cape Town, should the applicant be unable to implement the offset, and the City of Cape Town contributing to the cost of ecological burns.	Specialist response: Even though the preferred site of Hercules Pilaar would now be considered a "reactive" stewardship site, the CoCT would still play an important role in adjacent conservation endeavours. Although the CoCT's biodiversity management branch had offered to co-fund certain management interventions, especially where these would require city cooperation (prescribed/controlled burning) or would apply to multiple adjoining sites and not just the offset site, any role or support from CoCT has not been relied on or included in the calculations for the management. If any budget item is insufficient, the proposed metric/level of effort can be reduced accordingly, without jeopardising biodiversity persistence on the site. To note, however, that the CoCT will still be required by its mandate to participate in certain management activities and be required to sign off on management and operational plans prior to these being implemented. These costs are inappropriate to place at the door of the applicant. The above responses to points 2.1.1.2 – 2.1.1.6 were endorsed by the Botanist Nick Helme. The Biodiversity Offset report will not be amended.
		2.1.2. Given the above, it is also requested that CapeNature provides comments on the latest Biodiversity Offset Report (dated February 2025 and compiled by Mr. Mark Botha) as well the questions raised above and the responses provided by the Biodiversity Offset Specialist to such questions.	EAP response: CN will be requested to provide comment on the latest Biodiversity Offset Report (dated February 2025 and compiled by Mr. Mark Botha), and the responses to the above DEA&DP questions will be provided to CN as part of the request. NOTE: Comment from CapeNature was obtained and is included under comments 403 & 416 in this report.

		2.1.3. It is indicated in the Plant Species Impact Assessment Report (dated 10 February 2025 and compiled by Mr. N.A. Helme of Nick Helme Botanical Surveys) in certain instances that the operational and cumulative impacts will be 'neutral' after mitigation. The said specialist professional is therefore requested to provide further explanations on what is implied/meant by the identified impacts having a 'neutral' significance rating after mitigation.	Specialist response: The operational phase botanical impacts are assessed as Neutral to Low negative after mitigation, and the overall cumulative ecological impacts of the proposed development at the local scale are likely to be Low to Medium negative prior to mitigation, given the fairly small area of High or Very High sensitivity vegetation to be impacted (<3ha). After mitigation, and with implementation of an appropriate offset, and on-site management of the remaining conservation worthy areas, this could be reduced to Neutral or even Low positive." To clarify, this Neutral or even a Low positive botanical impact is deemed likely to come about with appropriate ecological management of the Very High sensitivity area on the site (alien vegetation and fire management – neither of which are part of the No Go scenario), and together with the significant biodiversity offset, which will conserve 77ha of currently unprotected priority habitat of much better quality than most of what will be lost on site, could result in a net Neutral to Low positive impact for conservation in the region. Neutral in this case means that the negative impact of loss of some sensitive habitat and rare species on site is balanced by the gains due to the management of the remaining sensitive areas and the gain due to the Biodiversity Offset.
	2.2. Specialist Input	2.2.1. Please ensure that all specialist reports to be submitted with the final EIA Report meets the requirements of either the "Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation" ("the Protocols") or Appendix 6 of the EIA Regulations, 2014 (as amended), where no Protocol exists.	EAP response: Noted and will be complied with
		2.2.2. As per this Directorate's previous request, as per the previous correspondence (dated 30 December 2024), it is hereby reiterated that each full specialist study and compliance statement that was	EAP response: Noted and will be complied with

		circulated during the Public Participation Processes undertaken and therefore to be submitted together with the final EIA Report contain a table/checklist to illustrate how each study either meets the requirements of either the applicable Protocol or Appendix 6 of the EIA Regulations, 2014 (as amended).	
		2.2.3. All specialist reports must further be final versions without any material/substantive changes/amendments and/or updates from the versions that were circulated during the last Public Participation Process relevant to the abovementioned revised draft EIA Report. If any specialist reports receive material/substantive changes/amendments and/or updates from the versions that were circulated during the last Public Participation Process, then such information must be made known to this Directorate so that a way forward can be determined prior to the final EIA Report being submitted to the Competent Authority, i.e., this Directorate.	EAP response: Noted
		2.3. Service Requirements 2.3.1. Given the advanced phase of your application, please ensure that all signed agreements letters from all service providers (public/State of private) are provided together with the final EIA Report. Should such letters be more than two (2) years old, then such updated all signed agreements letters must be provided.	EAP response: to be complied with
		2.3.2. Should there be instances where all required signed agreements letters not be available and you decide to submit the final EIA Report, this aspect may prejudice the outcome of your Scoping and EIA application.	EAP response: noted
		2.3.3. Please ensure that you provide confirmed service requirements and required infrastructure, which covers the entire proposed development.	EAP response: to be complied with
		2.4. Final Expansion Details	EAP response: The final EIAR provides details clear and concise information on the proposed project.

		2.4.1. It is hereby maintained that at this stage, the final EIA Report must provide the details regarding the definitive components of your proposal only. Please ensure that such information is included in a clear and concise description of your proposal. This must furthermore include all confirmed infrastructure and components such as water treatment plants etc.	
		2.4.2. In relation to the above, all other components of the proposal currently described in the revised draft EIA Report, as potential options and/or alternatives where the impacts of such components were not scoped out and assessed, as part of your current application (Referenced: 16/3/3/2/A5/20/2046/24), will fall outside the scope of the said application.	EAP response: All components of the proposed project are described in the final EIAR.
		2.5. Public Participation Process ("PPP") 2.5.1. Although it is noted that, as per the Protection of Personal Information Act, 2013, you have blocked out the details of registered Interested and Affected Parties ("I&APs"), the full details must be included in the final EIA Report, which is submitted to this Directorate for decision-making.	EAP response: Unsanitised details of registered IAPs will be submitted in the final EIAR to DEA&DP.
		2.5.2. You are required to submit proof of the Public Participation Process being conducted for the revised draft EIA report. This will include (but is not limited to): 2.5.2.1. Proof of the virtual meetings held on, during or after the revised draft EIA report was released; 2.5.2.2. Proof of the any Public Open Days held; 2.5.2.3. Proof that the revised draft EIA Report was made available to registered I&APs; 2.5.2.4. All comments received from I&APs; 2.5.2.5. A Comments and Responses Report, indicating all the comments received from I&APs on the revised draft EIA Report and the responses thereto; and	EAP response: No virtual meetings were held during or after the amended draft EIAR was released for comment. Proof of all meetings and public open days held will be included in the final EIAR submission. Proof that the revised draft EIA Report was made available to registered I&APs will be included in the final EIAR submission. All comments received from I&APs will be included in the final EIAR submission, both as a true reflection in the C&R and also as actual comments received. The full IAP register (unsanitised) will be included in the final EIAR submission.

		2.5.2.6. A complete list of registered I&APs.	
		2.5.3. Please ensure that all comments are fully responded to and adequately addressed prior to the submission of the final EIA Report. Proof hereof must be included in the final Comments and Response report to be submitted together with the final EIA report.	EAP response: All comments received are captured in the C&R and responded to in full. The final C&R will be included in the final EIAR submission to DEA&DP. The 3 previous C&R reports (Scoping and EIA Phase) will also be submitted with the final EIAR.
		2.5.4. Due to the nature of the proposal, it is recommended that you provide a courteous notice to all registered I&APs, relevant stakeholders and commenting authorities regarding your submission of the final EIA Report to the Competent Authority as well as access to such information for record purposes. This Directorate must be copied into the said notice.	EAP response: In terms of POPIA, only the names of individuals may be disclosed publicly. Commercially sensitive information may be redacted from the public version of the final EIAR & supporting documents. Technical responses within the final C&R that also contain commercially sensitive information will also be excluded from the public version, but the full report will be provided to DEA&DP for decision-making purposes. The public version of the report will indicate where information has been redacted and include a clear explanation that such information has been submitted to DEA&DP. The notification to IAPs will occur no later than one week after the submission of the final EIAR, and DEA&DP will be provided with this notification. Notification will include the same methodology as previous rounds of PPP through email and sms and a hard copy placed in the Fisantekraal library.
		2.6. Environmental Management Programme ("EMPr") 2.6.1. Please ensure that the EMPr contains all of the relevant recommendations and mitigation measures, as proposed throughout the relevant specialist study(s) and/or inputs, the BAR and elsewhere (e.g., those recommended by commenting authorities or Interested and Affected Parties).	EAP response: Noted

	2.6.2. 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 you fulfil these requirements.	EAP response: Noted
	2.7. 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.	EAP response: Noted
	2.8. Declarations by Applicant, EAP and Specialists on Final EIA Report You are hereby reminded to include the duly dated and signed declarations of the applicant, EAP and various specialists in the final EIA Report.	EAP response: Specialists will sign a copy within their respective reports at the appropriate last date the report was updated. The EAP and Applicant will sign within the final EIAR.
	3. In accordance with this Directorate's correspondence (dated 18 February 2025), the final EIA Report must be submitted to this Directorate no later than the close of business on Friday, 29 August 2025.	EAP response: Noted
	4. Should the final EIA Report not be submitted on or before 29 August 2025, the application shall lapse in terms of Regulation 45 of the EIA Regulations, 2014 (as amended) and your file will be closed. Should you wish to continue, a new application form must be submitted.	EAP response: noted
	5. You are reminded that it is an offence in terms of Section 49A of the NEMA for a person to commence with a Listed Activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity.	EAP response: Noted
	6. Kindly quote the abovementioned reference number in any future correspondence in respect of this application.	EAP response: Noted
	7. This Directorate reserves the right to revise or withdraw its comments and request further information from you based on any information received.	EAP response: Noted

	Natasha Bieding - DEADP		<i>Please refer to Point 2.2.1 of Comment 337 in Appendix 29C (comments submitted by DEADP on 30 December 2024), which reads as follows:</i> <i>"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 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."</i>
			Email from EAP to DEADP dated 17 June 2025: The attached comment received from DEA&DP refers. Could you please update me on when we will receive the comment from the Planning Intelligence Management and Research Branch as referred to in point 2.2.1?
		Email response from DEADP dated 4 July 2025: Thank you for your enquiry. It is hereby confirmed that comments from our Planning Intelligence Management and Research Branch will no longer be provided. I trust that you will find this response in order.	EAP response: Noted
399	Charles Tewitz - Tridonic SA (Pty) Ltd	Email dated 23 April 2025: Hope you are well. We are a Lighting Solutions Company, that does Intelligent Lighting Management and Solutions, that assists with cost- and energy savings. We can assist with Smart Lighting solution to the New Cape Winelands Airport, as well as cost saving solutions for other projects, and/or existing Indoor and Outdoor lighting. We partner with various local Lighting Manufacturers. We dearly want to get involved with the Multi-Purpose Project, and see what we can offer as a possible solution, and if we can assist in Cost and Energy Savings. Our Regional Area Manager is Leroy Baird, and he is an Astute Technical	Email response provided 23 April 2025: Thank you for the email. I am the independent EAP responsible for the EIA process and not the Applicant representative. I will record your comments, and register you as an IAP, but I would also recommend you register on the CWA website as a supplier. As I understand it the Applicant will then engage with you directly during the tender process. You are welcome to send me any comments on the amended draft EIAR available at download link https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/

		Solutions Leader. We have completed the following reference projects and work closely with the Western Cape Public Works Department. 1. Century City Smart City. 2. La Rochelle Girls (Astro Field) 3. Paarl Boys High (Astro) 4. Stellenbosch University (Lecture Halls, OAices, Etc.) 5. UCT (Various) 6. As well as major retailers: a. Woolworths b. TFG (Foschini Group) c. Etc. 7. We also did Health facilities and other School Stadiums, and smart Cities. Let us know if we can maybe setup a meeting to discuss this and you are welcome to see our offerings on our Website. Email reply dated 23 April 2024: 2. Thank you for the information, and we will register accordingly. Looking forward to building a future relationship.	
400	Mauricevr - VR-GolfCarts	Email dated 23 April 2025: 1. Trust this email finds you well. I unfortunately missed the live open day due to availability but thought id take this opportunity to engage. I have read through the post and I am still unsure as to whether it falls within our scope. From my understanding it lends itself to Environmental Impact assessments? With that said, I would like to know whether all Battery Operated Vehicles forms part of	Email response provided 23 April 2025: 1. Thank you for the email. I am the independent EAP responsible for the EIA process and not the Applicant representative. I will record your comments, and register you as an IAP, but I would also recommend you register on the CWA website as a supplier. As I understand it the Applicant will then engage with you directly during the tender process. You are welcome to send me any comments on the amended draft EIAR available at download link https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/

		this study, be it from Forklifts GPU's, Tugs Passenger Transport, or just basic vehicles to operate around the Airport all with sustainable Battery power. If this indeed falls within your Impact studies then I would be keen to provide you with a presentation as to what we can offer. Looking forward to your response Email reply dated 23 April 2025: 2. I have registered	
402	Brandon Layman (Administrative Assistant to: Cor Van der Walt) -WCDoA: LUM	Email dated 30 April 2025: 1. Please find attach comments from the WCDoA: LUM. Letter received via email dated 30 April 2025: 2. Your application of November 2024 has reference. The Western Cape Department of Agriculture (WCDoA) has no objection to the proposed application. Please note: - Kindly quote the above-mentioned reference number in any future correspondence in respect of the application. - The Department reserves the right to revise initial comments and request further information based on the information received.	Email response provided 30 April 2025: 1. Thank you for the comments received.
403 & 416	PHS Consulting: Request for Comment from CapeNature		Email from PHS Consulting to Cape Nature dated 6 May 2025: 1. Please see attached comments received from DEA&DP on the proposed expansion of CWA (DEA&DP ref: 16/3/3/2/A5/20/2046/24) and CN ref: SSD14/2/6/1/4/N_Cape Winelands Airport (refer point 2.1) [Please refer to Comment No. 398 of this report for the comments attached]. DEA&DP requests the following (refer Point 2.1.2 in letter): 1) That CN provides comment on the Biodiversity Offset Report (dated February 2025 and compiled by Mr. Mark

			Botha). I have attached the report again to this email for ease of reference. 2) That CN provides comment on the questions raised by DEA&DP and the responses provided by the Biodiversity Offset Specialist to such questions. The questions and responses are attached in table format [Please refer to Comment no 398 as well as Appendix C (C403) to this report] The comment period on the amended draft EIAR concludes COB next week 13 May, and it would be appreciated if you can include the above in your comments.
			Follow-up email from PHS Consulting to Cape Nature dated 12 May 2025: 2. Please confirm receipt of this email. According to the Terrestrial specialist's records the following people were present from CN at the online meeting on 7 June 2024 to discuss the proposed Terrestrial offset and site: Alana Duffell-Canham, Ismat Adams, Marius Wheeler.
	Ismat Adams - Cape Nature	Email dated 14 May 2025: 1. See attached comment, my apologies for the delay.	Email response provided 14 May 2025: 1. Thank you for the comment. I acknowledge receipt.
		Letter received via email dated 14 May 2025: RE: AMENDED DRAFT EIAR FOR THE PROPOSED EXPANSION OF THE CAPE WINELANDS AIRPORT DEA&DP ref: 16/3/3/2/A5/20/2046/24 Herewith comment on this application: 1. The proposed biodiversity offset approach is understood and summarised as follows:	EAP response: the comments are noted.

		1.1. Candidate offset receiving areas have been screened based on the availability and condition of Swartland shale and/or silcrete renosterveld on site. 1.2. The offset specialist has adjusted the 30:1 ratio based on the condition of the habitat/vegetation types present on site. The ratio has been adjusted based on condition to less than 50% the 30:1 ratio for remnants on the airport site that are in poor or very poor condition. 1.3. The area quantum required for the biodiversity offset has been calculated as 77ha. 1.4. SCC conservation measures for SCC on the airport site has also been proposed as an additional compensation measure – which includes search and rescue of botanical SCC to suitable habitat analogues on site and increase habitat protection and condition offsite for known occurrences. 1.5. Two candidate offset sites have been selected based vegetation type present, condition, SCC present and landowner willingness and implementation feasibility. 1.6. The Hercules Pilaar site is the primary proposed offset site and has 108ha of analogous habitat and meets the SCC requirement other than for some SCC. The site also contains viable 3ha and 15ha remnants that can be conserved. 1.7. Commitment to using the Hercules Pilaar site for the offset has been secured in the form of a letter of intent between the applicant and landowner, which covers long-term lease agreement/conservation servitude as well as an accompanying management agreement, and it is understood to include the requirement that the property is declared under NEMPAA. 1.8. The Hercules Pilaar site was considered for proactive stewardship which was not realised, but now is proposed for biodiversity offset and is therefore considered a reactive stewardship site. 1.9. The EMPr is proposed to include the Biodiversity Offset Management Plan.	

		1.10. The applicant will include the management of the offset site under the purview of their environmental management team. 1.11. Should the offset site not be able to be declared, it is proposed that a conservation servitude be implemented on the offset site. 1.12. Should the applicant not meet offset obligations it has been proposed that a condition of authorisation is that the EA is suspended and that the applicant needs to pay R8 million endowment to a PBO (Endangered Wildlife Trust) to establish a fund or augment an existing fund for the management of the offset site and adjacent priority conserved areas in the Klipheuwel Corridor that are not currently owned by City.	
		2. It is noted that the site plans have remained the same since the previous iteration of the application, and considered with the botanical specialists indication that SDP alternatives have similar impact significance, it is taken that the new proposed alternative 4 therefore has the same quantum of impact significance which needs to be offset.	EAP response: there have been amendments to the SDP package (Appendix 24 to the amended draft EIAR), which resulted in the new Preferred Alternative 4. The botanical impact between Alternative 3 and Alternative 4 remain the same, therefore the same quantum of impact significance which needs to be offset.
		3. The reduction of the offset ratios below 50% based on habitat condition is supported as this meets the ecological equivalence principle for offsetting (like for like). The lower vegetation type condition present, the lower one would expect to need to offset for ecological equivalence until degradation is of such a degree that no offsets are needed. It is understood and accepted that the offset specialist has included these remnants as a conservative and risk averse approach to the proposed offset. It is however noted that the primary offset site can accommodate an increased offset. On calculation this comes to about 89ha for the total offset area quantum, which could be met on the primary offset site. In consideration of the provincial offset committee comments on the offset, it is suggested that if the landowner is amenable that the offset receiving area be increased to this 89ha.	Response from Terrestrial offset specialist: The authorities can propose the higher offset requirement if they wish - my specialist response to the ratios stands. The candidate site was chosen to cater for just such an event. My suggestion is to not amend any document, but for the EIR to acquiesce to the Offset Committee's request to increase the liability to 89ha, and to offer the Pilaar site North as full and final discharge of this obligation (at 108ha). EAP response: The 77ha calculated offset has been increased to 89ha by the Applicant based on CN request, and this will be amended in the EMPr and EIAR. The Biodiversity offset report will not be amended.
		4. Considering that the Hercules Pilaar site has already been through CapeNature Stewardship Review in 2013, it is recommended that the site be re-submitted to the CapeNature Stewardship Review committee to ratify that the site will now be used for reactive stewardship, which will come with the condition that all costs associated with declaration, management, and establishment of the	Response from Terrestrial offset specialist: The applicant has already been advised to cover the full costs of securing and managing the Offset site in their budgets. My understanding is that they have committed to this and will fund the EMPr and associated admin processes accordingly. It seems unnecessary and a waste of the Applicant's resources, specialist's time and the authorities'

		site will be for the cost of the developer aligned to the Polluter Pays Principle. This can be done post EA, the competent authority would need to include a condition of EA to this effect.	administration capacity to resubmit an already approved site to the W C Site Review Committee for a simple bureaucratic entry. If required, the CEA's offset committee could simply inform the CapeNature holders of the stewardship review register to make the necessary amendments as to reactive vs proactive site, and any implications thereof. Burdening the EIR and proposed conditions of authorisation with additional requirements seems unnecessary and overcomplicating.						
	5.	The penalty recommendation is supported – i.e. suspension of EA, payment of endowment over and above any penalties imposed by the competent authority. But it is recommended that the condition be made more explicit to state that management of the offset site must come first. This is to inhibit the use of the penalty condition as an option other than the proposed biodiversity offset.	Response from Terrestrial offset specialist: It seems that there is still a misunderstanding on whether the Financial Penalty could be used by the applicant to avoid their liabilities of paying for offset site management. If they are in breach of their authorisation, the CA can easily issue a direction compelling them to rectify any lack of management, and impose additional administration penalties in addition to the explicit offset-linked Financial Penalty. This removes using this route as an option to avoid the need to implement and manage the offset.						
	6.	It is recommended that the offset management plan be included as subsidiary plan to the EMPr.	EAP response: The Terrestrial offset management plan is included as Annexure 18 to the EMPr.						
	7.	Regarding the offset specialist's response to the DEA&DP comments on the offset: <table><tr><th>DEA&DP comment</th><th>Specialist response</th><th>CapeNature comment</th></tr><tr><td>2.1.1.2 In terms of applying condition modifiers to the basic offset ratios the reduction of offset ratios below 50% of the basic ratio based on an argument of the condition of the ecosystem on the impacted site being</td><td>We acknowledge and appreciate the Department's comment in section 2.1.1.2 regarding the application of condition modifiers in determining appropriate biodiversity offset ratios. We understand</td><td>See comment in section 3 above. Regarding 2.1.1.3 it is understood based on the offset report that the Hercules Pilaar site has been surveyed and groundtruthed and the figures in the offset report are based on</td></tr></table>	DEA&DP comment	Specialist response	CapeNature comment	2.1.1.2 In terms of applying condition modifiers to the basic offset ratios the reduction of offset ratios below 50% of the basic ratio based on an argument of the condition of the ecosystem on the impacted site being	We acknowledge and appreciate the Department's comment in section 2.1.1.2 regarding the application of condition modifiers in determining appropriate biodiversity offset ratios. We understand	See comment in section 3 above. Regarding 2.1.1.3 it is understood based on the offset report that the Hercules Pilaar site has been surveyed and groundtruthed and the figures in the offset report are based on	EAP response: The responses from CN are noted. The Hercules Pilaar site has been surveyed and ground truthed and the figures in the offset report are based on ground truthed assessment.
DEA&DP comment	Specialist response	CapeNature comment							
2.1.1.2 In terms of applying condition modifiers to the basic offset ratios the reduction of offset ratios below 50% of the basic ratio based on an argument of the condition of the ecosystem on the impacted site being	We acknowledge and appreciate the Department's comment in section 2.1.1.2 regarding the application of condition modifiers in determining appropriate biodiversity offset ratios. We understand	See comment in section 3 above. Regarding 2.1.1.3 it is understood based on the offset report that the Hercules Pilaar site has been surveyed and groundtruthed and the figures in the offset report are based on							

		degraded cannot be agreed upon. This principle is in line with the current guidance captured in the 2015 Western Cape Guideline on Biodiversity Offsets. Likewise, the Western Cape Guideline also only allows for condition modifiers to be used to motivate for a reduction in the offset ratio for sites considered to be heavily degraded, but in this instance the ratio is being reduced for moderate condition sites as well. Any reductions in the offset ratio based on a site being in moderate condition is not acceptable, in principle, unless there are valid reasons, otherwise a 1:30 ratio should applied. Hence, such reasons must be provided accordingly. 2.1.1.3. Further to the above, clarification must be provided on whether the proposed	that the concern raised relates specifically to the reduction of offset ratios "below 50%" of the standard (gazetted) ratio, particularly where impacted ecosystems are not considered "heavily degraded." 1. DEADP's comment refers expressly to reductions in offset ratios below 50% of the basic ratio, which, in the case of Critically Endangered (CR) ecosystems, equates to less than 15:1 (i.e., 50% of 30:1). This principle is clearly understood and has been respected in the offset calculations. We confirm that: All likely impact areas of remnant vegetation were mapped generously – the actual remnant areas are less than shown in the table. No reduction below 50% of the gazetted ratio was applied to areas classified as being in	groundtruthed assessment.	

			offset site contains enough good condition ecosystem to cater for an increased offset ratio. moderate or moderate-to poor condition. Only those areas that were explicitly assessed as poor to very poor in ecological condition were assigned modifiers resulting in final ratios below 50%. These remnants have very low prognosis for persisting and almost no opportunity for effective restoration. 2. Use of Condition Modifiers Was Conservative and Justified: The Northern Silcrete Remnant, classified as moderate condition, was assigned a 66% modifier, yielding a final offset ratio of 20:1 — well above the 50% threshold. This site is heavily grazed and shows substantial impact from hoof action and a substantial reduction in structure and function. It cannot be linked to any similar ecosystem remnant to		

			maintain long-term function and species diversity maintenance. The Mown Grasslands, assessed as poor to moderate, were assigned a 50% modifier, resulting in a final 15:1 ratio — exactly at the threshold outlined in DEADP's comment. Only deeply degraded patches, such as residual Renosterveld fragments within or overlapping the runway layout, being heavily impacted by invasive aliens and prior evidence of earthworks/ploughing were assessed as poor to very poor and assigned a 33% modifier, producing a final 10:1 ratio. These were determined, using professional ecological judgement, to have crossed the threshold of functional collapse — with minimal ecological value or restoration potential. The final		

			comparison of ratios is provided in Table 1 of the Offset Report. The specialist stands by these proposals. 3. Principled Application Consistent with National and Provincial Guidelines: As outlined in the DFFE 2023 National Biodiversity Offset Guideline, condition-based adjustments are permissible when grounded in ecological evidence. While the Western Cape Guideline (2015) does call for caution, it similarly permits modifiers for heavily degraded areas if adequately motivated. The condition assessments used here were: • Conservatively applied based on site visits and botanical specialist findings; • Aligned with SANBI and DEADP precedents on		

				interpreting ecological viability and persistence; • Intended to ensure offset effort reflects ecological reality, not a rigid numerical standard. • The candidate offset sites are in far better condition than the impact sites, further supporting the use of the proposed exchange rules. 4. Offset Outcome is Substantial, Defensible, and Aligned with Good Practice: The total required offset of 77 hectares was calculated using conservative metrics, incorporates specialist input, and will be implemented through:		

				• Binding landowner agreements; • EMPr-based integration into long-term management; • An endowment-backed fallback to the Endangered Wildlife Trust in the event of non-compliance. • This ensures that real biodiversity value is secured, regardless of technical debate over numeric thresholds. • An additional area of approx. 30 ha is available on the preferred site to cater for any perceived deficiency. Therefore, in response to 2.1.1.3 on Offset site containing enough good condition ecosystem to cater for an increased		

			ratio, the answer is yes – although an increased ratio is still not justified. We therefore respectfully submit that: • DEADP’s concern about reductions below 50% is addressed and resolved, as no such reductions were applied outside the limited, heavily degraded areas; • The application of the 66% modifier for moderate condition was cautious and scientifically defensible; The broader offset proposal delivers a credible and meaningful conservation outcome in line with both provincial and national guidance.		
					EAP response: Noted

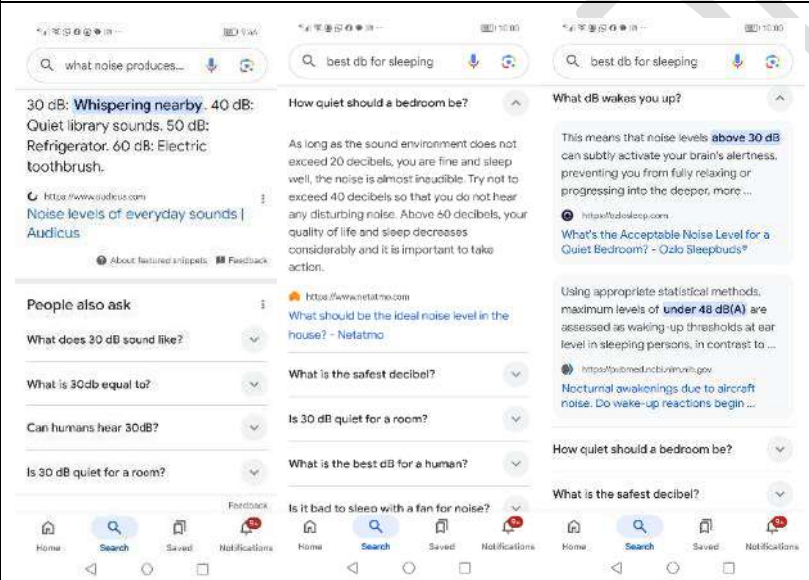
			DEA&DP comment	Specialist response	CapeNature comment	
			2.1.1.4. Confirmation must be provided on whether the sites requiring offset are inside or outside the Proclaimed Urban Edge of the City of Cape Town, as this affects arguments and motivations around reducing offset ratios. Depending on the confirmation provided, you must provide updated arguments and motivations around reducing offset ratios, where so required.	The offset specialists' understanding is that all the impact sites except the northern most one of 1,7ha, (66% modifier, 20:1 Final ratio) sit within the urban edge. This would provide further rationale for reducing the ratio – if authorities needed it.	The offset ratios proposed are above those proposed for within urban edge developments that require offset.	
			DEA&DP comment	Specialist response	CapeNature comment	EAP response: The Biodiversity offset report will not be amended and the EWT requirement will be made a condition of EA. Refer letter received from EWT.
			2.1.1.5. It is unclear whether the proposed R8 million penalty is to be used only for managing the offset, or also for securing the offset (via declaration as Nature Reserve/Protected Environment). This	The R8 million penalty is to be used for management as clearly stipulated in the second bullet of the final component of the proposed offset condition of authorisation, viz: "In addition to any other	If the report is not to be amended, then the potential EA should make the clarification as per section 5 above.	

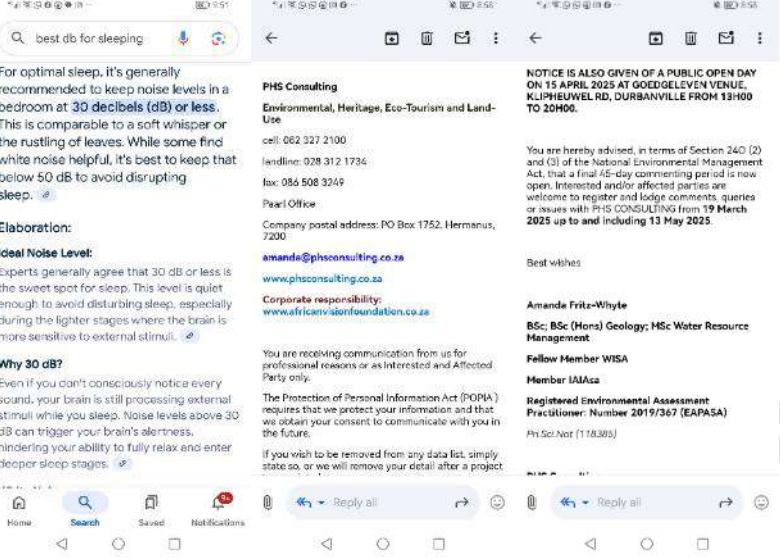
		information must therefore be made known.	administrative penalties that may be determined, a sum of R8 million becomes immediately payable to the Endangered Wildlife Trust, to establish a, or augment an existing, fund for the management of the offset site and adjacent priority conserved areas in the Klipheuwel Corridor not currently in City ownership". The Biodiversity Offset Report will not be amended as clarification on this comment becomes available to IAPs as part of the C&R responses.									
		<table><tr><th>DEA&DP comment</th><th>Specialist response</th><th>CapeNature comment</th></tr><tr><td>2.1.1.6. As the proposed offset represents reactive stewardship (land ownership will not be transferred), the</td><td>Even though the preferred site of Hercules Pilaar would now be considered a "reactive" stewardship site, the CoCT would</td><td>The developer will essentially become its own management authority of the offset site with its own resource cost for</td></tr></table>			DEA&DP comment	Specialist response	CapeNature comment	2.1.1.6. As the proposed offset represents reactive stewardship (land ownership will not be transferred), the	Even though the preferred site of Hercules Pilaar would now be considered a "reactive" stewardship site, the CoCT would	The developer will essentially become its own management authority of the offset site with its own resource cost for	EAP response: The Biodiversity Offset Report will not be amended. The requirement can become part of the condition of EA.	
DEA&DP comment	Specialist response	CapeNature comment										
2.1.1.6. As the proposed offset represents reactive stewardship (land ownership will not be transferred), the	Even though the preferred site of Hercules Pilaar would now be considered a "reactive" stewardship site, the CoCT would	The developer will essentially become its own management authority of the offset site with its own resource cost for										

			biodiversity offset report should be amended to remove any responsibility or cost for implementation being assigned to the City of Cape Town. This specifically relates to a conservation servitude being registered in favour of the City of Cape Town, should the applicant be unable to implement the offset, and the City of Cape Town contributing to the cost of ecological burns.	still play an important role in adjacent conservation endeavours. Although the CoCT's biodiversity management branch had offered to co-fund certain management interventions, especially where these would require city cooperation (prescribed/controlled burning) or would apply to multiple adjoining sites and not just the offset site, any role or support from CoCT has not been relied on or included in the calculations for the management. If any budget item is insufficient, the proposed metric/level of effort can be reduced accordingly, without jeopardising biodiversity persistence on the site. To note, however, that the CoCT will still be required by its mandate to participate in certain management activities and be	management, establishment and maintenance of the site in alignment with the Polluter Pays Principle. City can participate in management activities in terms of its mandate but must not suffer an additional resource cost due to the establishment of the offset site. - If the offset report is not to be amended, then the potential EA should include the abovementioned.	

			required to sign off on management and operational plans prior to these being implemented. These costs are inappropriate to place at the door of the applicant. The above responses to points 2.1.1.2 – 2.1.1.6 were endorsed by the Botanist Nick Helme. The Biodiversity Offset report will not be amended.		
		8. The freshwater specialist responses as per CapeNature's previous comments are noted and accepted.			EAP response: Noted
		CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.			EAP response: Noted
404	Madelein De Bruin - Local Resident	Email dated 12 May 2025: 1. As it has been confirmed by your senior environmental study, our Desibels will be 47. Based on this information supplied by you, I have the following concerns/requests please.			Email response provided 12 May 2025: 1. Thank you for your email and comments raised which will be answered through the Comments and Responses report to allow for specialist input. This report will be circulated to you once completed.
		1.1. Firstly I am attaching various screenshots and reports available on Google confirming the safe Desibels range for restorative sleep being around 30desibels. Aswell as the host of health risks associated with poor sleep caused by Desibels higher than 30. My suggestion or request to remedy this is the Winelands airport going to provide the residents with thicker glass windows to reduce this health risk?			Response by specialist: The World Health Organization (WHO) recommends that night-time outdoor noise levels not exceed 40 dB(A) to protect against sleep disturbance and associated health effects. However, the WHO also recognizes that in urban or urbanizing areas, exposure of up to 55 dB(A) may still be considered moderate

		1.2. Are there going to be regular in dependant measuring of this noise and environmental pollution done and available/transparent for any concerned affected people in our area to monitor our wellbeing in this regards? Without the residents being told that we have to pay for such regular testing and monitoring out of our own pocket as per your senior environmentalist professional acting very oppressive towards our concerns for wellbeing. 1.3. Surely in the future this airport will expand amplifying all the above concerns. So to ensure our communities best interest, who monitors these Desibels and how often? As we all bought in a quiet countryside and a busy international airport changes a lot of things, but at the same time it is great that Cape Town is upgrading, however I trust there is a genuine concern and interest of our communities health, well being and quality of life and that it's not just all about lining pockets.	and does not necessarily pose a significant health risk, particularly when mitigated through building design and planning. In line with both WHO guidance and South African standards (SANS 10103), the 45–55 dB(A) LRdn range is considered a low to moderate environmental noise exposure band. Within this range: • Residential activities are generally not significantly impacted, especially when standard building envelope attenuation (typically around 10 dB(A)) is taken into account. • Noise levels do not warrant mandatory mitigation measures, such as land-use exclusion or enforced acoustic insulation upgrades. Regarding the impacts on Existing and Future Residential Areas: • Existing residential areas (e.g. Klipheuwel and Fisantekraal) are outside the 55 dB(A) LRdn contours in the full-capacity Scenario 3 and are therefore not subject to significant average noise exposure. • For future development areas, such as Bella Riva, only a portion of the site falls within the 55–60 dB(A) LRdn contour. Importantly: - These areas are not exposed to high or frequent single-event exceedances, such as N70 (events above 70 dB(A)) or N60 (events above 60 dB(A) at night). - The absence of frequent high-intensity noise events indicates that residential land use remains appropriate and does not require enforced restrictions or design controls under current regulations. It is also noted that under Scenario 3 (full utilisation), only three night-time operations are scheduled within each 24-hour period, all of which are planned to occur before 23:00. This is a very low number, particularly when compared to the thresholds used internationally (e.g., the N60 metric), where more than 10–15 nighttime events above 60 dB(A) often trigger concern. This limited number of night operations significantly reduces the risk of:

			- Repeated awakenings or sleep disturbance, which are primarily caused by frequent nighttime noise events. - Cumulative sleep-related health impacts, even for those in the vicinity of the airport.
	2. I trust my concerns are conveyed clearly: - Who and how often is monitoring the pollution and noise level inside our town and having it available and transparent to us if we are concerned. This should be made mandatory by officials - Secondly providing us with noise reducing windows for our houses so health is not affected by the Desibels being higher than 30 and thus affecting restorative deep sleep		EAP response: refer to specialist response above.
	I look forward to your feedback. Screenshots attached to the above email:		-
			EAP response: refer to specialist response above.

			
405	Georina Westraadt – Local Resident	Email dated 12 May 2025: As a resident in Durbanville central since 1975, I wish to oppose the building of an airport at Phesantekraal, Durbanville. Because I have lived here for a long time, I know a lot of people and I also serve on various committees of several societies. Therefore, I hear the opinions of a lot of people. Many of the people in favour of the airport have not lived here very long, or are often uninformed. Some are impressed by the proposed development and see economic prospects. However, many see long-term, very detrimental and even devastating consequences, should the plans proceed. How will Durbanville look in ten year's time, taking into consideration that the majority of people who live here, moved here for a very particular lifestyle - rural, peaceful, relatively crime-free, well-functioning schools, a sense of community, the surrounding vineyards and open spaces, green fields visible, to name only a few. What will be left of this in a couple of year's time?	Email response provided 13 May 2025: Thank you for the email. Your comments will be recorded and responded to in the Comments and Responses report. EAP response: The concerns listed are noted. All comments raised by registered IAPs with the EAP are recorded and responded to in the C&R, and have informed specialist and technical reports throughout the EIA process. NOTE: concerns listed are responded to below where they are repeated.

	2. People worry about the noise. There will be an increase in aircraft noise and this cannot be denied, They are concerned about the pollution due to fuel emissions,	2. EAP response: Impacts associated with Noise and Air Quality are assessed in the AQ Impact Assessment and the Noise Impact Assessment conducted by specialists for the proposed project.
	3. Traffic is a concern considering the lack of access roads,	3. EAP response: Impacts associated with transport and roads are assessed in the TIA conducted by specialists for the proposed project.
	4. An increase in vagrancy, squatter camps and crime is a huge concern, considering the surrounds of Cape Town International Airport,	4. EAP response: The concerns raised have been assessed as part of the Socio-Economic Impact Assessment conducted by specialists for the proposed project.
	5. Industrialisation posing a threat to the rural lifestyle,	5. EAP response: The concern raised have been assessed as part of the Socio-Economic Impact Assessment conducted by specialists for the proposed project.
	6. The future of the farms - vineyards, chicken, dairy, equestrian, etc and the effect of the noise and pollution on that,	6. EAP response: Impacts on agriculture have been assessed in the Agro-Ecosystem Assessment conducted by specialists for the proposed project.
	7. A huge concern is the township adjoining the airstrip. What is going to happen to the people living in the recently developed garden village at Fisantekraal?	7. EAP response: The concern raised have been assessed as part of the Socio-Economic Impact Assessment conducted by specialists for the proposed project.
	8. How will wine-making be influenced on the historical farms around Durbanville?	8. EAP response: Impacts on agriculture have been assessed in the Agro-Ecosystem Assessment conducted by specialists for the proposed project.
	9. The value of our properties will drop and according to some estate agents already is a question with future buyers. Nobody wants to live close to a huge international airport. Compare the value of property in Kempton Park, Johannesburg,	9. EAP response: The concern raised have been assessed as part of the Socio-Economic Impact Assessment conducted by specialists for the proposed project.
	10. Business creep and the development of residential areas where there used to be green lungs and agricultural activities.	10. EAP response: The concern raised have been assessed as part of the Socio-Economic Impact Assessment conducted by specialists for the proposed project.

		11. Much can be added to this list, but please build the airport further away from beautiful Durbanville like in most of the developed countries.	11. EAP response: The comment is noted. The proposed project is for the expansion of an existing airport at an existing site and not for the building of a new airport at a greenfields site.
406	Leonard Heydenrych	Email dated 12 May 2025: - Please find attached correspondence for commenting on the proposed airport extension. Kindly confirm receipt of my email. Letter received via email dated 12 May 2025: Concerns regarding the Proposed Extension of the Cape Winelands Airport - We are concerned about the proposed extension of the Cape Winelands Airport. This development will be close to the established densely populated Fisantekraal and Durbanville communities. 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 Fisantekraal and Durbanville and surrounding areas.	Email response provided 13 May 2025: - Thank you for the email. The comments will be recorded and responded to in the Comments and Responses report. Response from specialist: The Fisantekraal community, located approximately 3km southwest of the airport, and the Durbanville suburbs, roughly 6 km away, have been specifically identified in the Noise Impact Assessment as sensitive receptor areas. The closest residential dwellings in Durbanville are situated approximately 6km outside the contour with the SANS guideline of 55dB(A). This implies that 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. The Fisantekraal community, situated approximately 3km southwest of the Cape Winelands Airport (CWA), was a key focus area in the Noise Impact Assessment (NIA) due to its proximity and residential character. Noise monitoring conducted in Fisantekraal in April 2022 (Monitoring Point MP04) showed: - Daytime ambient noise levels ranged between 55–60 dB(A). - Night-time noise levels were generally between 45–55 dB(A). These elevated levels were primarily due to local human activity, music, and vehicular traffic, and already slightly exceeded the SANS 10103 guidelines for urban residential areas—prior to any airport-related expansion. Despite its proximity to the airport, the modelled noise impacts on Fisantekraal are predicted to be very low, even under Scenario 3 (full capacity operation of the new runway):

			- The community falls outside the N70 and N60 noise contours, meaning there are no predicted single-event noise exceedances over 70 dB(A) during the day or 60 dB(A) at night. - The number of night-time operations is limited to only 3 aircraft movements during the designated night period (22:00–06:00), significantly reducing the potential for sleep disturbance. The LRdn (Day-Night Average Sound Level) in this area remains below critical thresholds and does not trigger a high-impact classification in terms of either community annoyance or health effects.
		2. 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.	Response by specialist: Noted. Refer to the comment above. In addition, the noise and air quality impacts have been quantified and addressed in the relevant studies.
		3. 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. The Fisantekraal High School is situated within 1 kilometer from the runway which is planned to be used for international flights accommodating Boeing 777, Boeing 737, Dreamliner and Airbus A380 and A350 aircraft. This high volume airport accommodating up to 300 flights per runway will create an untenable environment for children to study and prosper in academics and music and will have a severely negative impact on their health.	Response by specialist: The number of aircraft operations cited as potentially disturbing to Fisantekraal High School is not fully accurate, as school hours are from 08h00 to 15h00. According to the noise modelling for a busy day under Scenario 3 (full utilisation)—which reflects conditions projected to occur more than 15 years after the operational year—only 17 aircraft movements are expected during school hours. Furthermore, these operations will be evenly split between departures and arrivals to the north and south, reducing the concentrated impact on any one location. The average noise level (LAeq) at the school during maximum airport activity is projected to be 44.3 dB(A), which is within acceptable limits for an educational environment. Additionally, the number of single noise events exceeding 70 dB(A) (LAm_{ax}), such as during takeoff or landing, is expected to be fewer than three events during the school day. In this context, the primary noise source affecting the school will remain vehicular traffic, not aircraft operations. Overall, the predicted aircraft noise exposure at Fisantekraal High School is considered low and acceptable for a learning environment.

		4. The Fisantekraal community living within a very close proximity to this planned airport will also be severely impacted. 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). In our assessment the untenable environment created by this planned airport could highly likely lead to the forced displacement of innocent children and residents from Fisantekraal, who have occupied this area for the past 400 years.	Specialist response: refer to response above.
		5. On an international scale, airports will never be built within such a close proximity to a school such as Fisantekraal High School, due to the severe health risks involved. 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.	Specialist response: refer to response above.
		6. Air pollution is increased by both the air traffic and the increase of motor vehicle traffic (Bendtsen 2021). Increased ultrafine particles have been detected 40 km 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 Fisantekraal 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)	Specialist response: The claim that jet engine emissions have a measurable impact up to 40 km from a large airport appears to be overstated. A review of the cited article, “A review of health effects associated with exposure to jet engine emissions in and around airports” by Katja M. Bendtsen et al., does not contain any reference to a 40 km impact distance. The literature discussed in the review focuses primarily on areas in close proximity to major international airports, typically within a few kilometres of runways or flight paths, where pollutant concentrations are highest. Thus, the reference to a 40 km impact zone is not supported by the cited source. The concern raised regarding potential increases in air pollution from both aircraft and vehicular traffic, and the possible health consequences for nearby communities such as Fisantekraal, particularly given the public health burden of diseases like tuberculosis (TB) in the Western Cape is noted.

			It is important, however, to correct and contextualize several claims made in the comment: While it is true that aircraft engines emit ultrafine particles, the magnitude and dispersion of such emissions are highly dependent on airport size, aircraft type, traffic volume, and prevailing meteorology. The study cited (Bendtsen 2021) refers to major international hubs with tens of thousands of large aircraft movements per year, not a regional airport like CWA, which—even at full buildout—is forecast to have fewer than 210 daily movements, many involving small aircraft with lower emissions. The Air Quality Impact Assessment conducted for the Cape Winelands Airport found that ambient air quality impacts will be low and within national standards, with no significant increase in PM2.5 or ultrafine particulate concentrations at sensitive receptors such as Fisantekraal. As such, there is no scientific basis to suggest that aircraft at CWA will elevate UFP concentrations 40 km away, as cited.
		7. The area of Fisantekraal (Phesantekraal) is a natural heritage area which has been farmed on by the Dutch settlers and the Khoisan since 1652. The farm Groot Phesantekraal was first granted in 1698 to Olof Bergh by Simon Van Der Stel, who was the then Governor of the Cape. (SAHO, 2016) Olof Bergh, who was from Swedish descent, then married the ‘beautiful lady’, Anna De Koningh, a slave lady of color from Batavia and who was the daughter of Angela van Bengale.(SAHO, 2016) Anna’s husband became the first prisoner on Robben Island before being extradited to Ceylon in 1690. Olof and his wife Anna returned to Cape Town in 1695 and Olof being a wealthy business man then, also purchased Groot Constantia farm in Cape Town. After Olaf Bergh’s death in 1724, Anna outlived her husband by many years and became the rightful owner of Groot Constantia and Phesantekraal in Durbanville. It is reasonable to assume that both farms were thus seen of equal importance to the inhabitants of Cape Town in the late 1600’s and early 1700’s. Anna De Koningh is therefore seen as a ‘stam moeder’ of South African society with Phesantekraal being ‘her farm land.’ (SAHO, 2016) Historically this is therefore a heritage area which is very important for our indigenous people	EAP response: A Heritage Impact Assessment that consisted of archaeological, cultural and visual specialist input were completed and consulted with I&AP. These reports were presented at Heritage Western Cape IACOM and the project was endorsed by Heritage Western Cape.

		and the Dutch settlers. This area needs to be protected from industrialization at all costs in order for it to maintain its natural heritage purpose and function as farm land. The disturbance of 'her peaceful farm land' by noise and pollution from the planned airport will have an extremely negative impact on 'her' environment.	
		8. Several farms surrounding this planned airport will most probably have to be closed down should the expansion go ahead, due to pollution and excessive noise. These include poultry, horse, cattle and crop farms and in the process thousands of workers will lose their jobs, many more than the few privileged who will obtain permanent jobs through the planned airport.	EAP response: Impacts on agriculture have been assessed in the Agro-Ecosystem Assessment conducted by specialists for the proposed project.
		9. Several other historic farms are surrounding the proposed airport expansion dating back to the 1600's and 1700's. These agricultural farms and historic farm buildings which are still fully functional could be severely impacted by the proposed expansions of the airport. We need to protect our environment in the same manner that the famous female author, Beatrix Potter, protected the 'Lake District' in the United Kingdom. Many of the old historic farm buildings and vines are at eminent risk of being permanently damaged by the proposed expansions of the airport.	EAP response: A Heritage Impact Assessment that consisted of archaeological, cultural and visual specialist input were completed and consulted with I&AP. These reports were presented at Heritage Western Cape IACOM and the project was endorsed by Heritage Western Cape.
		10. It is also interesting to note that the proposed 'Cape Winelands Airport' will only be 20 kilometers apart from Cape Town International Airport serving a relatively small population of 4 million people, compared to a city like Washington DC where the two international airports are separated by 42 kilometers serving a much bigger population of 6 million people. Airports need to be separated by a significant distance apart in order to prevent a crowded airspace.	EAP response: The feasibility and co-existence of CTIA and CWA have been assessed in the EIAR through aviation specialist studies.
		11. We believe that due to the detrimental effects on the environment and on the health and well-being of the residents of Fisantekraal and Durbanville, the planned Cape Winelands Airport extension should be reconsidered. Further, the Fisantekraal and Durbanville community should be fully informed about the potential negative effects on their health and well-being that the proposed extension will have	EAP response: The potential impacts of the proposed project are assessed through specialist studies as part of the EIA process.

		Bibliography: 1. Basner M, Clark C, Hansell A, Hileman JJ, Janssen S, Shepherd K, et al. Aviation Noise Impacts: State of the Science. Noise & Health. 2017;19(87):41-50 2. 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 3. Van der Walt M, Moyo S. The First National TB Prevalence Survey South Africa 2018. Short Report. 4. 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 5. 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 6. Dockrat A, Kashe-Katiya X, Badsha O, South African History Online (SAHO) 28/11/2016, 349 Albert Road, Woodstock, Reg No 2000/011193/08, 037-117 NPO, PBO 930002222	EAP response: Noted
407	Etienne A Roux & Michaele Collins - DEADP Directorate Air Quality Management	Email dated 13 May 2025: 1. I just wanted to know if there is any possibility that you can afford us until Friday to submit comments to you? Please do let me know if you can accommodate this request.	Email response provided 13 May 2025:
		Email dated 14 May 2025: 1. Kindly find attached comments for your attention Please confirm receipt of this email	-
		Letter received via email dated 14 May 2025:	EAP response: Noted

		COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR), AIR QUALITY IMPACT ASSESSMENT REPORT (AQIA), NOISE IMPACT ASSESSMENT REPORT (NIA) 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. 1. The Directorate: Air Quality Management (“the Directorate”) has reviewed the above mentioned documents for the proposed development, dated March 2025, which was received by the Directorate on 19 March 2025. 2. The Directorate notes that previous comments (dated 19 December 2024) submitted by the Directorate has been addressed.	
		3. Kindly be advised to also engage the Air Quality Officer (AQO) for the City of Cape Town Municipality (Mr. Ian Gildenhuys) regarding the proposed activity, given its location within the City of Cape Town’s jurisdictional area. Mr. Gildenhuys can be reached on 021 444 8364 or Ian.Gildenhuys@capetown.gov.za.	EAP response: the Air Quality Officer (AQO) for CoCT (Mr. Ian Gildenhuys) is on the Register of IAPs and has been engaged with throughout the EIA process.
		4. 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.”	EAP response: The comment is noted.
		5. Please note that the above-mentioned comments/recommendations do not pre-empt the outcome of the application.	EAP response: The comment is noted.
		6. No information provided, views expressed and/or comments made by the Directorate should in any way be seen as an indication or confirmation: that additional information or documents will not be requested; or	EAP response: The comment is noted.

		of the outcome of any application submitted to the authorities.	
		Please contact Mzolisi Benxa (Mzolisi.Benxa@westerncape.gov.za) or Etienne Roux (Etienne.Roux@westerncape.gov.za) should you have any further queries in this regard.	EAP response: The comment is noted.
		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.	EAP response: The email address will be added to the Register for future communications.
408	Clarissa Fransman - CoCT - Spatial Planning and Environment Directorate	Email dated 13 May 2025: Please find attached City of Cape Town collated comment on the above-referenced application.	Email response provided 13 May 2025: Thank you for the email and the comments as attached
		Letter received via email dated 13 May 2025: 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. Your email correspondence and accompanying Notification Letter, dated 19 March 2025, and the Amended Draft Environmental Impact Assessment Report, dated March 2025, 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.	-
		Record of previous City of Cape Town comments provided on the above project: - Pre-Application Scoping Report comment dated 18 January 2024; - Draft Scoping Report comment dated 23 August 2024; and - Draft Environmental Impact Assessment Report comment dated 13 December 2024.	EAP response: The comment is noted.

		The following technical comment is provided by the relevant City of Cape Town Departments based on the information provided in the Amended Draft Environmental Impact Assessment Report (Amended DEIAR) and accompanying documentation: 1. Spatial Planning and Environment: Urban Planning and Design (UPD) Department 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 (NDP). The following UPD Department's comments relates to whether its previous comments have been adequately captured and addressed in the Comments and Responses Report (CRR) and how previous matters raised by the UPD Department have been responded to in the relevant specialists reports.	-
		1.1. The following raised previously refers: 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. 1.1.1. The response in the CRR clarified that there are two phases proposed for the proposed expansion. The first phase is to commence once authorisations are issued and phase 2 will be triggered by growth in passenger numbers, as included in the Amended DEIAR and specialist reports: • Table 16 of the Amended DEIAR (page 180) describes the phasing of the airport expansion showing the link between the Planning Activity Levels (PALs), the number of expected annual passengers, and the phases 1 and 2 mentioned in the documentation. Additional details regarding these phases are also discussed in Appendix 25 (from page 5 onwards) in the form of site	EAP response: Noted

		development plans and engineering plans for each phase. • Appendix 24: Traffic Impact Assessment, dated February 2025, compiled by ITS indicate expected future trip generation for certain planned activity levels (PAL) phases. • Appendix 37: The Bulk Engineering Services Report, dated 19 February 2025, compiled by Zutari also provides a breakdown of demand calculations per PAL phase for sewerage flows (page 22) and water demand (page 30). • Appendix 38: The Electrical Engineering Bulk Services Design Report, dated 4 March 2025, compiled by SANDS Engineering Solutions notes the electricity demand per PAL phase (page 2). In light of the above inclusions in the Amended DEIAR and specialist reports, the UPD Department is satisfied with the information provided to date.	
		1.2. The following raised previously refers: The noise impact assessment submitted previously as part of the EIA was not comprehensive and only alluded to the ambient baseline noise environment around the CWA.	EAP response: The Noise Scoping and baseline report was included in the Scoping Phase of the EIA, and is not similar to a Noise Impact Assessment.
		1.2.1. The UPD Department notes that the Amended DEIAR has been updated with the inclusion of Appendix 5, a second Noise Impact Assessment, dated October 2024, compiled by DDA that modelled noise impact for three scenarios based on activity levels associated with the expansion and operations, including full operations, of the CWA.	EAP response: The Noise Impact assessment was included for the EIA Phase as required by the NEMA Regulations.
		1.3. The following raised previously refers: An under representation of existing and latent land use rights in the vicinity of the CWA.	Response from town planner: The MPBL, LUPA and SPLUMA do not make provision for a concept of “<i>latent land use rights</i>”. The only land use rights dealt with in planning legislation are confirmed and unconfirmed land use rights, non-conforming uses and lapsed

			rights. “<i>Latent use rights</i>” are presumably the expectations of landowners not founded in law. Section 35 of the MPBL states: “35 Use right <i>(2) No person may use or develop land unless the use or development is permitted in terms of the zoning scheme or an approval is granted or deemed to have been granted in terms of this By-Law.”</i> Section 99(2)(e) of the MPBL requires the City to only considers the “impact on existing rights (other than the right to be protected against trade competition) in assessing land-sue applications”. The existing land use rights have been described in detail in the appendices. The deal with so-called “<i>latent land use rights</i>” would be tantamount to speculation on other landowners’ properties. The only “future use” that can be considered in respect of other properties in the vicinity is the MDSF and the Northern District Plan. Section 14 (4) of the MPBL states: “<i>The municipal spatial development framework does not confer or take away rights</i>” and section 16(3) states “<i>A district spatial development framework and a local spatial development framework do not confer or take away rights</i>”. The relevant content of the MSDf and the Northern District Plan is discussed in detail in the appendices to this NEMA application.
		1.3.1. While a list of proposed surrounding land uses is included in various appendices, the potential impacts of the CWA on these land uses remain unclear. It is acknowledged that such assessments, in part, may be the responsibility of prospective developers, who would need to engage directly with the airport operator to understand and mitigate potential impacts. In this regard, as the department responsible for long-term planning in the City, it is essential that the UPD Department is made aware of how each proposed development may affect the other. This level of coordination will be a requirement during the future land use application phase for any developments abutting the airport, and equally, for the proposed CWA itself.	Response from town planner: The potential impact on surrounding land is addresses in detail across several appendices, in particular the noise impact assessment, Obstacle Limitation Surface (OLS), TIA, VIA, air quality assessment, poultry biosecurity assessment and Agro-ecosystem Assessment. These issues will be further considered during the land use application process ito the MPBL. Additionally, the impacts on surrounding properties are discussed in the applicant’s responses to comments submitted by adjacent landowners. The UPD department is correct that prospective developers and the CWA should engage and collaborate. These processes have been initiated with Bella Riva, Gardens City, County Fair and all the farmers directly north of CWA. The

			recent EIA application for Bella Riva presents a revised concept and flexible layout plan developed in response to CWA. Given that land ownership around CWA is not fragmented, it is entirely feasible for a small number of commercial entities to coordinate their efforts, driven not only by mutual self-interest but also by the broader public benefit.
		1.4. The following raised previously refers: The regional role of the CWA 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.	-
		1.4.1. The Amended DEIAR addresses the regional role of the CWA in relation to existing airports within the Western Cape. Appendix 15: The CWA Diversion Airport Analysis, dated 2 November 2023, compiled by PACE outlines the complementary role of the CWA, positioning it primarily for general aviation and limited scheduled operations.	Response from CWA: CWA has a traffic forecast for scheduled operations which covers both domestic and international traffic. In addition to being a commercial airport, CWA will play multiple complementary roles to CTIA: • Reliever airport • Alternate Airport • Additional GA Capacity The scale of the airport expansion and phasing is based on the traffic forecast which states that CWA will accommodate 5,23 MPPA by the year 2050 and will have an opening capacity of 1,7 MPPA.
		1.5. In addition to points 1.1 – 1.4 above, it should be noted that the Urban Design Policy, along with the applicable spatial development framework, the MSDF and the NDP will serve as important reference documents during the land use management application phase.	Response from town planner: This is acknowledged and will be addressed in the MPBL land use applications.
		2. Spatial Planning and Environment: Development Management Department 2.1. The Development Management Department's previous comment has been acknowledged and responded to in the CRR.	EAP response: The comment is noted.
		2.2. A pre-consultation meeting for the land use management application took place on 4 December 2024 (as noted in the CRR) where relevant aspects of the development proposal was discussed.	EAP response: The comment is noted.

		3. Human Settlements: Forward Planning Department The Human Settlement Development: Forward Planning Department's comment relates to how the proposed expansion of the airport will impact on the approved Greenville Garden Cities housing development from a human settlements perspective, in terms of noise levels, traffic congestion and potentially securing open market opportunities. Noise Impact Assessment (NIA) – 2nd Draft, dated October 2024, compiled by DDA	-
		3.1. Based on the NIA, Scenario 2 will have a low high impact and Scenario 3 will have a high impact on the existing Greenville Garden Cities development.	Specialist response: Please note correction on IAP statement Scenario 2 (New Runway 01/19 at Operational Year) will have a <u>LOW impact</u>, and Scenario 3 (New Runway 01/19 at Full Capacity) will have a <u>HIGH impact</u>.
		Mitigation Measures 3.2. The mitigation suggested under section Operational Phase Noise Mitigation Procedures of the NIA in order to amend land uses to industrial and commercial is not deemed as a viable mitigation measure. The reason being the Greenville Garden City development has already been approved for residential development and construction phases of the first phases has commenced.	EAP response: The mitigation of establishing compatible land use (such as industrial and commercial) to be located around airport facilities and directing incompatible land use (such as houses and schools) away from the airport forms part of a range of proposed mitigation measures and remains a viable option. Response from specialist: The comment is noted, and discussions with potential affected parties is ongoing. CWA response 3.2 to 3.4: We appreciate the City's position; however, we believe a more nuanced distinction is necessary. While it is correct that the initial phases of the Greenville Garden City development have been approved and construction has commenced west of the Mosselbank River, it is equally important to note that the land directly south of the proposed runway—specifically Rem. Portion 4—no longer holds valid residential rights. This was confirmed by the

			City itself in a zoning certificate issued on 7 June 2022, noting that the rights lapsed due to timeframes not being met. Given this, it may be appropriate to reconsider whether residential development is the optimal use of that particular portion of land, especially in light of its proximity to the airport's proposed runway. From a planning perspective, aligning future land uses with noise contours—particularly where new rights would be required in any event—may be a more responsible and proactive approach to long-term compatibility. This is not to undermine Greenville's broader vision, but to ensure that land use decisions are both forward-looking and practical, considering current conditions and regulatory realities. We remain open to working with the City and Garden Cities to explore mutually beneficial outcomes.
		3.3. In light of the approved Greenville residential development, the most suitable mitigation strategies, from a human settlements perspective, that should be considered are the following: 3.3.1. Provide incentives for airlines to obtain aircraft with the latest available noise reduction technology, through for example noise-related landing charges. 3.3.2. 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. 3.3.3. Consider noise-related operating restrictions for night-time. These can be imposed on a voluntary basis by the airport, or by the Government.	EAP response: The Noise IA report lists viable mitigation options on page 5-30 of which the 3 listed by CoCT in this comment are already included. Specialist response: The comment is noted.
		3.4. The following strategy proposed to be implemented needs to be discussed with Greenville Garden City developer directly, as this will have a financial impact on the future cost of units: "Passive" mitigation measures, such as noise insulation on existing residential dwellings and noise-sensitive buildings (schools, hospitals, etc.) may be considered.	Specialist response: the comment is noted. Discussions with potential affected parties is ongoing.

		Monitoring Network and Monitoring Plan 3.5. The monitoring conducted for the construction phase is deemed sufficient.	EAP response: The comment is noted.
		3.6. The monitoring terminals located at each residential area is noted and this will assist with providing correct noise data.	EAP response: The comment is noted.
		Socio-economic Impact Assessment, dated October 2024 (revised March 2025), compiled by Multi-Purpose Business Solutions 3.7. The major socio-economic impact is linked to the construction phase and potential impacts on transport routes and access. In this regard, although the mitigation strategies proposed will have a low impact on the surrounding communities it need to be adhered to.	Response from socio-economic specialist: Added to Impact Statement: <i>...implementing the proposed mitigation measures must be made a condition for approval.</i>
		Transport Impact Assessment, dated February 2025 (Revision 1), compiled by ITS Consulting Engineers 3.8. The planned road realignments will assist the future developments of Greenville Garden City and also mitigate and prepare for future traffic congestion.	EAP response: The comment is noted. Specialist response: comment noted and agreed with.
		3.9. The transport mitigation strategies have considered the surrounding communities and have aligned construction plans with future developments in the affected area. These strategies need to be adhered to ensure limited impact on the surrounding communities during construction and operational phases.	EAP response: The comment is noted. Specialist response: comment noted and agreed with.
		4. Future Planning and Resilience: Policy and Strategy – Economic Analysis Branch 4.1. Previous Economic Analysis Branch's comments have been acknowledged, and the Amended DEIAR has been updated to address its previous comments.	EAP response: The comment is noted.
		4.2. The efficacy of the proposed solutions to potential disruptive consequences of the proposed development relies on the operational and	Response from socio-economic specialist: Addressed in socio-economic impact assessment.

		planning efficacy of the developers, as is the case for limiting the influx of workers and maintaining security surrounding the site.	Response from CWA: Noted and agreed.
		4.3. The burden of avoiding the risk of expanded informal settlements is left entirely to the relevant property owners and the “relevant authorities”, which appears to be an implicit acknowledgement that these costs will ultimately be borne by external parties and the City of Cape Town.	Response from socio-economic specialist: Addressed in socio-economic impact assessment. Response from CWA: Noted.
		4.4. A more proactive stance, pertaining to the monitoring and communication of the risk of expanded informality as a consequence of the proposed development, would need to be included in the responsibility of the developers.	Response from socio-economic specialist: Addressed in socio-economic impact assessment. Response from CWA: Noted.
		5. Urban Mobility: Transport Impact Assessment and Development Control (TIA&DC) Branch 5.1. The TIA&DC Branch together with the Roads Infrastructure Management Department has had two further technical meetings with the consulting engineers and applicant on 5 February 2025 and 8 April 2025.	EAP response: The comment is noted.
		5.2. The TIA&DC Branch will provide further detailed comments on the development during the land use management application stage, including comments regarding the detail of transport infrastructure required for each development phase at the time of development	EAP response: The comment is noted.
		6. Safety and Security: Fire Services - Fire and Life Safety Branch 6.1. The Fire and Life Safety Branch’s previous comments as provided in the City of Cape Town’s comment, dated 13 December 2024, remains applicable and refers (see extract below):	EAP response: The previous comments were incorporated into the EMPr and Veldfire Management Plan and Emergency Preparedness and Response Plan (still to be developed). The corrections will be made.

		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: 6.1.1 A Fire Engineer (ECSA Registered) shall be appointed for this project. 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. 6.1.2.1 Fire hydrants to be provided as per SANS 10400 – T4.35. 6.1.2.2 Provide access for emergency vehicles complying with the Community Fire Safety By-law. 6.1.2.3 Section 12 Provision of water for Fire Fighting (SANS 10400-W: 2011). 6.1.3 Storage and use of Flammable substances shall comply with Chapter 8 of the Community Fire Safety By-law. 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. 6.1.1. A correction is however made with regards to Point 6.1.2.2 of the Fire and Life Safety Branch’s previous comment that must read as follows (see underlined text): 6.1.2. Provide access for emergency vehicles complying with the Community Fire Safety By-Law Section 12. 6.1.3. Provision of water for Fire Fighting (SANS 10400-W: 2011).	EAP response: The Waste Management Plan (WMP) addresses all aspects related to Pest Control. The EMPr enforces the implementation of the WMP which is included as an Annexure. Pest Control is enforced predominantly through the Occupational Health and Safety Act, 1993 (Act No.85 of 1993) and would be considered part of the daily operations of the Airport. Best practice pest control measures will be implemented, and a Certified Pest Control Company will be appointed on the onset of the Construction and Operational Phases (?) to ensure that preventative measures are put in place and monitored to ensure the effectiveness of the Pest Control Schedule.
		7. Community Services and Health: Environmental Health Department The Environmental Health Department advised the following: 7.1. A more comprehensive vector control management for all waste and waste-related activities must be included in the final Environmental Management Programme (EMPr). While Section 6 of the Draft Waste Management Plan (Appendix 39B: Annexure 8), dated March 2025, compiled by PHS Consulting does reference vector control, the level of detail provided is insufficient. Therefore, the final EMPr must be revised to address vector control measures adequately.	
		8. Community Services and Health: Air Quality Management (AQM) Unit	EAP response: Noted

		8.1. The AQM Unit is satisfied with the responses as provided in the CRR, relating to the AQM's comments as provided in the City of Cape Town comment, dated 13 December 2024.	
		8.2. The following additional AQM Unit comments are provided in response to the Amended DEIAR:	-
		8.2.1. Point 8.9.1 of the City of Cape Town's previous comment, dated 13 December 2024 noted the non-compliance with the Regulations prescribing the format of the Atmospheric Impact Report (AIR), R747 of 11 October 2013). It was clarified that the prescribed AIR format applies to Atmospheric Emissions License requiring facilities; however, the proposed expansion does not require an AEL. Therefore, a simplified format was used for the AIR to avoid unnecessary detail. The AQM Unit acknowledges and accepts the EAP's response.	EAP response: Noted
		8.2.2. It is noted that a "modular and flexible approach will be followed to construct the fuel storage containers in phases". Therefore, an AEL application will only be lodged 6-12 months before the proposed CWA intends to exceed the 1000m3 and it will not form part of the current Environmental Impact Assessment (EIA) process. The threshold will likely only be exceeded in 2038; therefore, an AEL application will only be lodged in 2037. However, if the requirement transpires to exceed the threshold sooner, the AEL application timing will be adjusted accordingly.	EAP response: Noted
		8.2.2.1. Based on the above statement, a review and amendment of the Air Quality Impact Assessment Report (AQIAR) will be required by the time an atmospheric emission licence is applied for.	EAP response: Noted
		9. Community Services and Health: Noise Control Administration Unit Noise Impact Assessment (NIA) - 2nd Draft, dated October 2024, compiled by DDA.	-

		9.1. The methodology used to carry out the NIA is found acceptable and in line with South African (SANS 10117: 2008) and international guidelines (INM), relevant to the field of study and proposed expansion project.	Response from EAP: noted
		9.2. Regulation 4 of the Western Cape Noise Control Regulations PN200/2023 is legally applicable, and the NIA will be scrutinised in light of provisions of this regulation.	Response from EAP: noted
		9.3. It is evident that the expansion project is aimed at becoming an international commercial airport, as per following statements: “The airport aims to develop into an international commercial airport and multimodal logistics hub, with excellent rail, road, and air connectivity. The airport upgrades associated with the development will deliver an airport capacity of 5,2 million passengers per annum (MPPA). - (Nov2023)” and in the description of the airside development, that “passenger boarding bridges will be able to accommodate Code F Aircraft”.	Response from CWA: Noted.
		9.3.1. Code F aircraft is, according to the International Civil Aviation Organization (ICAO), large airplanes with a wingspan ranging from 65 to 80 meters. Examples include the Boeing 747-8 and the Airbus A380. These aircraft require specific airport infrastructure and procedures due to their size.	Response from CWA: Noted.
		9.3.2. The list of aircraft listed in Table 4-8 of the NIA is deemed not directly comparable and representative of aircraft being used for international air travel, such as the Airbus A380 and Boeing 747-8.	Specialist response: The noise modelling focuses on a realistic fleet mix based on anticipated regional and medium-haul operations. This approach ensures a relevant and robust assessment of environmental impacts aligned with the airport’s expected usage patterns. Aircraft like the A380 and Boeing 747-8, while notable in size, are primarily used on long-haul international routes and are highly unlikely to be a frequent feature at a regional facility such as CWA. Their operational presence in South Africa is also limited to major international hubs. As such, they would not materially influence cumulative noise exposure levels for surrounding communities.

		9.4. The following recommendations on page 5-30 of NIA refers: “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.”	Specialist response: The approach described in Section 5.3 of the Noise Impact Assessment (NIA)—which states that <i>“the identification of the most suitable and cost-effective mitigation measures... can only be a result of consultations between the various stakeholders... taking into consideration the safety and security requirements...”</i> reflects standard best practice in environmental management, particularly for complex infrastructure like airports.
		9.4.1. The installation of at least three noise-monitoring stations as described in the NIA must become a requirement and condition of approval should the application be authorized.	EAP response: The requirement will become a condition of EA. Specialist response: Noted.
		9.4.2. It is emphasised that 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.	Specialist response: Noted.
		9.4.3. The data acquired by the monitoring stations should further be handled and distributed as per the NIA specialist’s recommendations (Sections 5.3 and 5.4 of the NIA).	EAP response: Noted Specialist response: Noted.
		9.4.4. The establishment of a complaints registry and provision/submission of quarterly reports to the Noise Administration Unit must be included in the final EMPr.	EAP response: This requirement is already included in the EMPr page 114. Specialist response: Noted.
		Noise Mitigation and Management Plan (NMMP) 9.5. The commitment in the revised EMPr (March 2025) that indicates that a Noise Mitigation and Management Plan (NMMP) will take place post authorisation is acknowledged.	EAP response: Noted
		9.6. The inclusion of the NIA recommendations as measures of noise mitigation into the EMPr (2.2.3 Noise Mitigation) is acknowledged.	EAP response: Noted

		9.7. The inclusion of category F aircraft may alter the outcome of the noise modelling, and in the event that it does, confirmation of the revised noise cones should be submitted to the Noise Control Administration Unit as part of the NMMP.	Specialist response: The noise modelling focuses on a realistic fleet mix based on anticipated regional and medium-haul operations. This approach ensures a relevant and robust assessment of environmental impacts aligned with the airport's expected usage patterns. Aircraft like the A380 and Boeing 747-8, while notable in size, are primarily used on long-haul international routes and are highly unlikely to be a frequent feature at a regional facility such as CWA. Their operational presence in South Africa is also limited to major international hubs. As such, they would not materially influence cumulative noise exposure levels for surrounding communities.
		Provided the noise related concerns raised under Points 9.3-9.4 are addressed, and should the Competent Authority consider a positive outcome and authorise the application, the City of Cape Town requests the following be set as stand-alone conditions of the environmental authorisation: • The compilation of a Noise Mitigation and Management Plan (NMMP); and • The installation of at least three noise-monitoring stations as described in the NIA.	Specialist response: Noted. EAP response: These requirements are noted as conditions of environmental authorisation.
		10. Urban Waste Management: Integrated Planning - Planning and Strategy Branch Waste Services 10.1. It is confirmed that the Collections of the Waste Services Department as the service provider has sufficient unallocated capacity to accept, collect, and dispose of all types of waste to a designated licence landfill site.	EAP response: Noted and will be communicated to DEA&DP as requested.
		10.2. A good waste management system must be in place in order to handle all waste generated by the on-site activities and mitigate any negative impact on the environment	EAP response: Noted

		10.3. The Draft Waste Management Plan (Annexure 8 to the Environmental Management Programme) must be corrected as follows:	EAP response: The correction will be made.
		10.3.1. The referenced Vredenburg landfill site, as mentioned on page 388 of the Waste Management Plan, does not fall within the boundaries of the City of Cape Town.	EAP response: The WMP has been amended.
		Integrated Planning 10.4. It is reiterated that during the construction phase; the contractor must ensure compliance with the Integrated Waste Management By-Law (2009 as amended). All waste produced during the construction phase must be transported by an accredited service provider. It is acknowledged that this is reflected in the Draft Waste Management Plan.	EAP response: Noted
		11. Water and Sanitation: Technical Services - Water Demand Management Branch 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.	EAP response: Noted
		12. Water and Sanitation: Catchment, Stormwater and River Management (CSRM) Branch 12.1. The CSRM Branch received a Concept Stormwater Management Plan entitled "Concept Stormwater Management Plan, Revision S" dated 12 August 2024, as compiled by Zutari outside of the EIA process.	EAP response: Noted
		12.2. A detailed Stormwater Management Plan (SWMP) must be submitted to the CSRM Branch for approval prior to the submission any land use management application submission.	EAP response: The current Concept SWMP that was subjected to consultation as part of the EIA process is regarded as sufficient for the EIA purposes. It addresses the requirements of specialist consultants, comments made, and it include the necessary mitigation measures to address stormwater impacts. The Concept SWMP will further be subjected to the Town Planning application process whereby it will be finalised. After the Town Planning SDP approval, the Detailed SWMP will be approved by the CoCT. This final Detailed SWMP will

			then replace the current Concept SWMP that is an annexure to the EMPr. DEA&DP will be informed of this replacement for the record.
		12.2.1. The detailed SWMP must be in accordance with the following: • Management of Urban Stormwater Impacts Policy, 27 May 2009. • Floodplain and River Corridor Management Policy, 27 May 2009. • By-Law Relating to Stormwater Management, 30 August 2005	Response from Zutari –The finalisation of this issue is still in discussion with CoCT. Also see EAP response to 12.2 above.
		12.2.2. The detailed SWMP must address the following summarised requirements, as expanded on in the CSRM Branch’s email communication addressed to the consulting engineer, Zutari, dated 30 April 2025: • A detailed phasing and construction-sequencing plan must be provided. • A comprehensive Service Level Agreement (SLA) is required between this development and the underlying sites, such as Bella Riva. • A detailed plan, layout, and sectional drawing must illustrate how discharge from the airport is conveyed through Bella Riva. • A detailed stormwater servitude plan must be included. • Detailed overland flow and discharge routes must be clearly indicated. • The SWMP must detail the interconnectivity between wetlands and stormwater infrastructure, including how groundwater recharge will be facilitated.	Response from Zutari –The finalisation of this issue is still in discussion with CoCT. Also see EAP response to 12.2 above.

		- Detailed bird mitigation strategies must be incorporated into the plan. A detailed plan for external stormwater infrastructure upgrades must also be submitted. - The City's Stormwater Policies and By-law must be included within the Environmental Management Programme (EMPr) in the Policy and Legislative Context.	
		12.3. It is acknowledged that Points 11.3 and 11.4 of the City of Cape Town's previous comment; dated 13 December 2024 has been addressed and/or included in the updated EMPr.	EAP response: Noted
		13. Spatial Planning and Environment: Environmental Management Department – Biodiversity Management Branch (BMB) Botanical Impact Assessment, dated 10 February 2025, compiled by Nick Helme Botanical Surveys	-
		13.1. Throughout the Botanical Impact Assessment (pages 19, 20 and 21) reference is made to a “neutral impact”. It must be clarified what a “neutral” impact means/entails as the impact hierarchy commonly used in South African Environmental Impact Assessments does not include the category “neutral”.	Response from specialist: Apologies for any confusion caused, but I have used the category of “Neutral” impact for 30 yrs without anybody querying it, so assumed it would be clearly understood as implying neither a notable negative nor a notable positive impact.
		13.2. It must be clarified how the cumulative impact can be considered “neutral” when the construction phase impact is still regarded as “medium negative” after mitigation.	Response from specialist: Bearing in mind the above response the cumulative impact is a product of the negative construction phase impacts and the operational phase impacts, which includes positive management impact on conserved areas within the project area, and the required biodiversity offset, which will also have a large positive impact on currently unconserved priority habitat remnants outside the immediate project area. Cumulative impacts are typically viewed at a regional or national level. The net cumulative botanical impact is deemed to be neutral, in that the negative is essentially balanced by the positive.

		Biodiversity Offset Report, dated 20 February 2025 (Revision 1), compiled by Mark Botha 13.3. The Biodiversity Management Branch does not endorse the use of condition modifiers that exceed 50% of the ratio outlined in the National Biodiversity Offset Guideline (2023). The medium significance poor condition category should be recalculated to be no less than 50% of the 30:1 ratio, in alignment with the guidance provided in the Western Cape Biodiversity Offset Guideline (2015) and National Biodiversity Offset Guideline (2023).	Response from specialist: Their lack of endorsement of condition modifiers of the offset ratio below 50% of the guideline (i.e. I used 33% for the medium sensitivity areas) refers. The attached photo CWA1 (thanks Nick Helme for all) shows the impact site. 2.3ha will be lost. Although some species of concern remain the structure and function of the ecosystem is seriously degraded. Invasive aliens have dominated for decades, and the No Go option will ensure they eventually effectively displace the renosterveld. The Offset of 23ha of excellent condition, almost pristine renosterveld is a great mitigation outcome in my opinion. And contributes to the neutral assessment of Helme (CoCT point 13.2) 
		13.4. The application of a reduced offset ratio to the “moderate condition, very high significance” category, subject to a condition modifier, is questioned. According to the Western Cape Biodiversity Offset Guideline (2015), critically endangered vegetation in moderate condition should be offset at a ratio of 30:1 without any condition modifiers. Furthermore, patch isolation alone does not justify a reduced offset ratio.	Specialist response: The use of any condition modifier (i.e my reducing the ratio from 30:1 to 20:1) for Critically Endangered vegetation (outside the urban edge) is questioned. The attached photo CWA2 shows the impact site. It is not only totally isolated by ploughed lands, but also too small to persist, is heavily overgrazed, lacks any serious complement of other renosterveld biota, and only supports few SCC. The loss of 1.7ha (unavoidable due to CCA rules on runway alignment) is

			proposed to be offset with 34ha of excellent condition, almost pristine, connected veld. This is a good outcome. 
		13.5. The proposed biodiversity offset ratios should be calculated separately areas located inside and outside the urban development. It is unclear why the entire development footprint is currently considered to fall outside the urban development edge, while condition modifier ratios have been applied. There is precedent in Cape Town for reducing the offset ratio only for loss occurring within the urban development edge. As such, kindly refer to the Western Cape Biodiversity Offset Guideline (2015).	Specialist response: CCT Requires Calculate separate ratios for impacts inside and outside the urban edge (they have precedent to use lower ratios inside the edge). As the Urban edge bisects the site in an ecologically meaningless way, it seemed defensible treated the entire development in a uniform way. To do otherwise would make no ecological sense, regardless of the guideline. See photo CWA3 - which is inside the urban edge - and could easily be argued to be almost completely lost with no prospect of ecological function ever being retained. but which is nevertheless given a ratio coherent with the specialists' other rankings. In most cases I would argue that this site does not require an offset but nevertheless have said that the 1.3ha of mown grassy areas with a few residual bulbs impose a 20ha offset liability on the applicant. This is an excellent outcome for biodiversity.

			
		13.6. As the proposed biodiversity offset is based on a reactive stewardship approach, the City of Cape Town cannot assume responsibility for the implementation costs, including the 40 50% allocation toward ecological burn requirements. As such, the Biodiversity Offset Report must be revised to exclude all cost implications to the City of Cape Town. The polluter pays principle, as outlined in the National Environmental Management Act (Act 107 of 1998), must apply.	Specialist response: The site is a reactive stewardship, CoCT will not contribute any costs towards management and especially controlled burning. Apologies - this is an error on my part, I amended the text and the management plan requirement in the spreadsheet but not the table 4 in the Report. I concur that the phrase "~~Assumes CoCT covers 40-50% costs~~" must be redacted. The applicant will need to make available whatever resources are required for any prescribed controlled burn as part of its EMP for the broader site, including the set asides on the airport precinct itself. EAP response: The Biodiversity offset report has been amended to remove the above strikethrough sentence.
		13.7. The proposed R8 million penalty (on page 17) does not appear to account for the lease or purchase of the Hercules Pilaar Conservation Area	Specialist response:

		or any other site. Kindly clarify why the calculation of the penalty is based solely on management costs and explain how the proposed funds would be allocated should the developer fail to secure the Hercules Pilaar Conservation Area in perpetuity. Provided the biodiversity offset related concerns raised under Points 13.1-13.7 are addressed, and should the Competent Authority consider a positive outcome and authorise the application, the City of Cape Town requests the proposed biodiversity offset be set as a stand-alone condition of the environmental authorisation.	As explicitly mentioned in the CRR, the R8million penalty is expressly for site management only. It cannot include an additional site lease/purchase amount, as this is already subject to an existing, concluded Letter of Intent for the applicant to secure the site. Otherwise, it would be double counting.
	14. Spatial Planning and Environment: Environmental Management Department – Environmental and Heritage Management (E&HM) Branch 14.1. The E&HM Branch’s previous comments provided during the DEIAR circulation have been addressed by the following documentation: • Amended DEIAR, dated March 2025 • Appendix 29C: Comments and Responses Report; • Appendix 39A and B: updated Draft EMP, dated March 2025 and accompanying Annexures		EAP response: Noted
	14.2. It is noted that as per the Biodiversity Offset Report, Revision 1 dated 20 February 2025, compiled by Mark Botha (page 15) that the “EMP can be updated to include the relevant offset site interventions and timelines set out in this report”. It is recommended that the relevant offset interventions (as the said Biodiversity Offset Management Plan) be compiled as a separate Annexure.		EAP response: The Terrestrial / Biodiversity offset report is attached as a separate annexure to the EMP, with interventions and timelines also drawn into the EMP.
	Heritage 14.3. Heritage Impact Assessment (HIA), dated October 2024, was submitted to Heritage Western Cape (HWC) and assessed by the Impact Assessment Committee (IACOM) on the 22 January 2025. HWC issued a decision in which the IACOM has resolved to endorse the Heritage Impact Assessment (HIA) in specific reference to the following conditions:		EAP response: Noted

		14.3.1. 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.	Response from town planner: Landscaping strategies (including tree planting and management) are important, as they must take into account the findings of several specialist reports, particularly the bird strike risk assessment. It is not possible to provide a fully detailed Landscape Master Plan at this stage. The CWA site is exceptionally large, covering approximately 880 hectares, with a maximum length of around 4.3 km and a width of just over 3 km. Due to the scale of the site, producing an overall site and landscaping plan is impractical, as the level of detail becomes illegible when the PDF is enlarged or when printed on A3 or A4 paper. Precinct-based landscape plans is a more effective and manageable approach. An airport is a unique development where precincts are physically separated for security, with only the Terminal Precinct accessible to the public and other precincts limited to authorised personnel only. From outside of the development, the airport will only be visually experienced by road-based passengers from Lichtenburg Road and on the future Lucullus Road extension. These circumstances do no warrant a “master” site plan and landscaping plan (MLP) or Master Site Plan. It is sufficient to only have one level of plan for each precinct, namely a site plan with a landscaping plan, and indicate the connections with adjacent precincts on such plans. Should a composite plan be required for the entire site, it should simply be for information purposes only. However, the submission of these strategies referred to by the E&HM Branch becomes important for consistency in such an approach. It is agreed that a tree survey/tree planting and management strategy, an irrigation/stormwater strategy, detailed fencing and boundary interface proposals, and a consolidated lighting proposal be submitted. Detailed signage proposals will be submitted as part of applications made under the City’s Outdoor Advertising By-law.
		14.3.2. Further visual specialist input will be needed at the level of the Land Use Planning application and the future Site Development Plan (SDP) planning phases.	Response from town planner:

			Noted. The VIA makes many recommendations which can be responded to in the Urban Design detailing that is likely to be imposed as a condition of approval, if approved under the MPBL.
		14.4. The City's Environmental Strategy 2017 (Policy Number 46612) was adopted by Council on 24 August 2017 and states the following: "In taking decisions, operating, and planning for the future, the City will ensure that the value of the city's cultural heritage is recognised, protected and promoted, and that the benefits and opportunities it provides to communities are realised." As such, when considering a development proposal or land use change, the potential impact on the city's cultural heritage needs to be assessed and ensured that negative impacts are prevented, minimised or mitigated. In light of this, the following is considered:	EAP response: Noted
		14.4.1. The HIA fulfils the requirements of Section 38(3) of the National Heritage Resources Act (Act 25 of 1999) and the findings of the HIA, dated October 2024, are deemed acceptable alongside the mitigation measures recommended on pages 113 to 129 of the Visual Impact Assessment, dated September 2024, compiled by Filia Visual.	EAP response: Noted
		Signage 14.5. Appendix 14: Visual Impact Assessment (VIA), dated September 2024, compiled by Filia Visual refers. 14.5.1. It is acknowledged that in Point 4.4.3 (page 76) of the VIA Report that the correct Outdoor Advertising Bylaw, 2023 is referenced. 14.5.2. On page 69 of the VIA, it is indicated that the CWA has a signage guideline, however, the signage guideline has not been included as an appendix as part of the Amended DEIAR.	14.5.1 – EAP response: Noted 14.5.2 EAP response: The signage guideline was attached as annexure 14 to the EMPr.
		14.6. Once the relevant land use management approval has been issued, a signage master plan must be submitted to the Environmental and Heritage Management Branch – Northern Region for evaluation.	Response from town planner: Noted. A signage master plan will be submitted as part of applications made under the City's Outdoor Advertising By-law.

		CONCLUSION 15. The above City of Cape Town comment must be addressed and included in the Final Environmental Impact Assessment Report (FEIAR). The Final Environmental Impact Assessment Report and the final decision by the Competent Authority are to be submitted to the City of Cape Town for record purposes	EAP response: Noted
409	Cindy Winter - Drakenstein Municipality	Email dated 13 May 2025: 1. Thank you for affording Drakenstein Municipality the opportunity to participate in the process to obtain Environmental Authorisation for the proposed expansion of the Cape Winelands Airport. The documents were circulated to the relevant internal line departments. Please note that Drakenstein Municipality has no objection to this application.	Email response provided 13 May 2025: 1. Thank you for the email Your comments are noted
410	James Brand - ENS Africa on behalf of Country Fair	Email dated 13 May 2025: 1. With reference to the above matter, please find attached our client's comments on the Amended Draft EIA report and some of its appendices. Kindly confirm receipt hereof and provide us with a link to the Final EIA Report as submitted to DEA&DP and DWS.	Email response provided 13 May 2025: 1. Thank you for the email and the comments attached.
		Letter received via email dated 13 May 2025: RE: COMMENTS ON THE AMENDED IN-PROCESS 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) 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, the In-Process Draft Scoping Report process in August 2024, and the In-Process Draft Environmental Impact Assessment Report in January 2025. We have been mandated, once again, to submit comments on the Amended In-Process Draft Environmental Impact Assessment Report on County Fair's behalf, which we do hereunder.	EAP response: Noted

		Comments on the Draft EIA Report We propose commencing with aspects of the Comments and Responses Report (Appendix 29C) and will thereafter comment on the Amended 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.	EAP response: Noted
		Comments and Responses Report relating to our client and our letter of 13 January 2025	-
		1. Our client takes exception to the disclosure in the Comments and Responses Report (CRR) of the engagement between the project's proponents (CWA) and our client and, in particular, to the bold note at the top of page 246 of 416 reflecting the alleged status of the engagement between the parties. As mentioned by us in paragraph 1 on page 2 of our letter dated 13 January 2025, the meetings which had been held between the parties 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. Having forewarned you and the CWA representatives in that paragraph of our letter, our client is astounded by the inserted paragraph in bold at the top of page 246 of 416 of the CRR. The statement there contained conveys the incorrect message to the competent authorities (DEA&DP and DWS) and should not have been included in the CRR at all. Our client insists that in the next iteration of the CRR this paragraph be removed and not replaced with any reference at all to any ongoing engagements between the parties.	Response from CWA: CWA, as the Applicant has a duty and responsibility to spend time and make every effort to find common ground between CWA and County Fair (CF). We have been doing exactly that over the last 2-3 years. The status previously reported upon was an accurate reflection of the process and progress made at the time, this without disclosing confidential or sensitive information. The outcome from the specialist report confirms that both the airport and CF can co-exist, noting suitable mitigation. We remain committed to working with County Fair. EAP response: The off-record minutes of engagements between the parties are not included in the C&R, merely the summary of engagements and that it is ongoing. This documentation is already in the public domain so removing it serves no purpose. The applicant was encouraged by DEA&DP to engage with adjacent landowners. Procedurally the information is shared in the public domain to indicate adherence to this requirement from DEA&DP.
		2. In any event, our instructions are that as at the time of submitting these comments to you, no progress has been made in the discussions between the parties and therefore to state, as you do in the offending paragraph, that "Regular and ongoing engagements ... (have) 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	Response from CWA: The last thing the CWA team would want to do is undermine the possibility of successful engagements with CF, it is however important for the authorities and I&AP's to understand the extent to which CWA has gone in an attempt to reach agreement with CF.

	solution,” is simply not true. Our client sees no purpose in perpetuating what has been discussed on a confidential off-the-record basis in a public forum as you end up publishing aspects that should never find its way into a public document like your CRR, for example, your recordal on page 292 of 416 of Mr Levetan’s notification to you of his retirement from this firm and your response thereto wishing him “all the best with the retirement”. Simply put, whether the parties continue to engage or not and where that engagement might lead to, must not be reflected in your next iteration of the CRR as it might impact on the competent authorities’ assessment of our client’s concerns.	EAP response: The communication with Mr Levetan is important to include as it indicates a change in contact person for the IAP and thus a change to the IAP register. All engagements with IAPs, especially where it indicates a change in the contact person of that IAP, will be reflected in the C&R for the sake of transparency and to explain any amendments to the IAP Register.
	3. We note that the majority of the responses to the concerns raised in our letter of 13 January 2025 have been made by CWA themselves and do not reflect your or the various specialists’ views. As such, our client questions the veracity of a number of these responses as being self-serving to the interests of CWA. So, for example, in the response numbered 2 on page 248 of 416, CWA state that the two sites/developments (referring to our client’s operations and the propose airport expansion) cannot co-exist is incorrect and that the specialist reports conclude that co-existence with suitable mitigation, is possible. The use of the word “possible” is significant. One would have thought that if suitable mitigation could be implemented, the word to be used would have been “probable”. As we shall demonstrate herein, the so-called possibility is not supported by the specialists and CWA’s further comment in this paragraph that the airport expansion and development is not a factor that might result in a decision to be taken by our client to relocate its operations, is therefore rejected by our client.	EAP response: When responses are formulated to a comment from an IAP, either the EAP, a specialist / technical team member, or CWA will respond, whichever party is best suited to address the comment. Many times the response may contain input from CWA, the EAP and / or a specialist. The use of <u>possible</u> in the response by the Applicant is acceptable, as it is a quote from a specialist report and not influenced by the opinion of CWA or any other party. Please refer to page 25 of the Poultry Biosecurity report where it states: <i>In general, with suitable mitigation measures it should be possible for the farm and the proposed airport to coexist.</i>
	4. In paragraph 3 on page 249 of 416, CWA’s response demonstrates that they have totally misunderstood our client’s concern. What we have said in our previous comments is quite clear, namely, that the activities at the existing Fisantekraal airfield have not impacted on our client’s operations and its biosecurity. We mentioned, and it is clear from the aerial images contained in your reports, that the land side activities at the existing airfield are situated away from our client’s operations on the eastern side of the existing runways. On the other hand, all the landside activities of the proposed expanded airport are to be moved to the western side right up against the boundary with our client’s farms and, certain of the proposed facilities will literally be constructed	EAP response: The reasoning behind placement of the infrastructure on the West rather than the East of the runway has been addressed in previous responses (Appendix 29C page 254): 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.

		between 100m and 300m from our client's closest chicken houses. The increase in human activity so close to our client's chicken houses will undoubtedly compromise our client's biosecurity and this was the point that we have made repeatedly in our previous comments. For CWA to state that 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" demonstrates a remarkable naivety on the part of CWA as the changes right up to the boundary fence, are significant.	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. Further to the above the Poultry Biosecurity report assessed the impacts associated with the development of CWA, inclusive of landside development on the West, and proposed mitigation measures, which have been included in the EIAR and EMP. Please refer to page 25 of the Poultry Biosecurity report where it states: <i>In general, with suitable mitigation measures it should be possible for the farm and the proposed airport to coexist.</i>
		5. CWA go on to state that because the airport predates our client's facilities and operations, our client should have foreseen the possibility that the airport may expand at some time in the future and therefore should not be complaining now that that eventuality may occur. What CWA are not factoring into their response is the fact that our client's operations adjacent to the Fisantekraal airfield have been in existing for 57 years and that the proposed expansion will most definitely impact negatively on its operations and as a result it is entitled, as a registered interested and affected party to raise its concerns in the way we	EAP response: All comments raised by the IAP has been recorded in previous C&R and in this document and responded to. Impacts of the proposed CWA project on CF have been evaluated by various specialists (notably the Poultry specialist Dr Petty). The Poultry Biosecurity report assessed the impacts associated with the development of CWA, inclusive of landside development on the West, and proposed mitigation measures, which have been included in the EIAR and EMP. Other concerns raised by the IAP on for example groundwater has been

		have done on its behalf in the various comments that we have submitted to you up to now.	invaluable and have informed amendments to the Groundwater Impact Assessment and the WULA and EIAR.
		6. In paragraph 4 on page 250 of 416, CWA respond to our reference to the agreements reached with the potential developers of Bella Riva and repeat their statement that from their perspective there is no issue or concern with our client continuing to operate on its site. This magnanimous comment on CWA's part is rather disingenuous. It is our client's concerns for its continued existence, its stringent biosecurity and food security that are the real concerns and not the commercial imperatives of CWA. Our client has every intention (as it has done in the past) of holding the potential Bella Riva developer to the agreement that was reached and if, as appears to be the case, there is any question of incorporating part of the Bella Riva development into the greater airport expansion, our client will take appropriate steps to ensure that the provisions of its agreement with Bella Riva are fully implemented. The decision to refrain from using chicken manure for the planned biodigester, mentioned by CWA in this paragraph, is noted but inasmuch as this was based on its own specialist's advice (that of Dr Deryn Petty) this decision by CWA was inevitable and does not represent, as CWA appear to suggest in this paragraph, a concession on their part.	EAP response: The omission of chicken manure to be used in the biodigester was as a result of the IAP comment and specialist evaluation and recommendation. Response from CWA: CWA is working hard to achieve alignment and integration of surrounding developers. We hope to achieve the same with CF.
		7. CWA's response in paragraph 5 starting on page 250 of 416 and continuing onto page 251 of 416 is not a response to point 5 of our letter dated 13 January 2025. In any event, we intend dealing with the issues of noise and light pollution when dealing with the Amended In-Process Draft EIA report and the two specialist reports respectively.	EAP response: All comments received by IAPs during the previous round of PPP (Nov to Dec 2024) were adequately addressed in the C&R Appendix 29C. Point 5 in the letter dated 13 January 2025 reads: 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 <i>"CF concluded that in an urban area such impacts are inevitable and should be accepted by CF."</i> 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.

			The response provided in the C&R reads: Response from CWA: The noise specialist report confirms no undue noise will impact on the CF land and operations, the impact should be 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>" Further response from EAP: The response provided is adequate. Further comments raised will be addressed below.
		8. In paragraph 6 on page 251 of 416 in dealing with the concept of a buffer zone, CWA's response is rather disingenuous. The distance between the four breeder farms within the Fisantekop Complex has not, and does not, compromise our client's biosecurity in view of the stringent measures our client applies to its staff and to any visitors to the farm. The issue remains the distance between the closest of our client's chicken houses and the various facilities which are to be established well within the recommended 1000m guideline which is also supported by the CWA specialist, Dr Petty. Accordingly, CWA's comment that "there are historic, current and possibly greater biosecurity risks within the current four breeder flocks on the CF site being closer to each other than the recommended minimum distances prescribed" is a veiled attempt by CWA to place the boot on the other foot. In the next paragraph of the response, CWA states that "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". Our client records that during the 2017 avian flu outbreak, one of its breeder farms on the complex was impacted and after immediately taking steps to isolate that breeder farm, our client successfully prevented the disease from spreading to the other breeder farms. This demonstrates the effectiveness of our client's biosecurity measures notwithstanding the fact that the breeder farms may be closer to each other on the complex than the recommended 1000m buffer zone. Our client therefore categorically denies that it is attempting to use the airport development to address any "current inherent	EAP response: The IAP should please refer to the specialist response which was also provided to point 6 and which reads: <i>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 anticipated, the fact is that it has increased the risk that the farm may experience outbreaks of diseases. 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.</i> <i>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</i>

		and biosecurity risks” on its complex, of which there are none. What our client has stated is that the development of the land side facilities in close proximity to our client’s chicken houses constitutes a serious and significant risk to our client’s biosecurity, something which is totally absent in the context of the existing Fisantekraal airfield.	<i>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. 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.</i> Further response by EAP: The specialist has addressed the biosecurity concern regarding the development of land side facilities in close proximity to CF.
	9.	The response in paragraph 6 also includes input from Dr Petty and our client’s Dr Lukhele. Dr Petty’s response as set out in this paragraph does not really take the matter any further but we note that she is in agreement with Dr Lukhele’s statement to the effect that the biosecurity in place on our client’s complex is effective in mitigating diseases. However, her further comment that the occurrence of increased traffic due to the airport can easily be mitigated with the current practices in place since the traffic would be unlikely to involve exposure to poultry or wild birds, is incorrect. The land side facilities will introduce large numbers of human beings in close proximity to our client’s chicken houses. With the proposed land side development which will include facilities such as terminal buildings, an hotel, restaurants and even a commercial fuel station, all well within the recommended 1000m buffer zone, there exists a very real possibility of disease being spread onto our client’s adjacent breeder farms notwithstanding the stringent biosecurity measures that our client imposes. This is the point that Dr Petty and CWA have completely missed.	Response from poultry specialist: The concerns regarding increased human activity, proximity of landside development, potential for increased traffic, and wild birds as well as waste management practices are acknowledged as relevant biosecurity considerations. The core question, however, is whether the airport and farm can coexist without harm to the poultry farm, and if so, the significance of the airport's impact on farm biosecurity. Any increase in traffic, both foot and vehicular, inherently affects biosecurity. This is discussed below: It is crucial to consider the existing biosecurity context of the poultry farm. The farm is currently located 600m from a township, a proximity that carries significant biosecurity risks. It is highly probable that township inhabitants keep poultry and may purchase cull chickens from other operations, which is a major pathway for disease introduction. This existing proximity and associated traffic would have likely contributed to the HPAI outbreak referenced in paragraph 8. The HPAI outbreak, despite the farm's excellent procedural biosecurity, represents a failure of the overall biosecurity situation, indicating that the farm's location has become a persistent biosecurity risk. Therefore, the current traffic on the R312, which includes cull trucks, manure transport, and poultry workers from other farms, remains a significant, if not

			the greatest, biosecurity concern. The quality of traffic associated with the airport is distinct; individuals traveling to or working at the airport are unlikely to be transporting disease vectors such as cull chickens or dead wild birds. <i>Currently Melish Road carries very low traffic volumes. Future traffic will mostly be airport-related. There is an estimate of a total of 700 vph in both directions for phase 1 with a approximate 50:50 split (i.e 350 vehicles per hour per direction). Also note that when the East-West link road is connecting the proposed Bela Riva development with Melish Road, future traffic from this development may use Mellish to access Lichtenburg Road towards Stellenbosch and we assumed approximately 100 vph from Bela Riva. The expected number of pedestrians are very difficult to estimate at this stage. Based on the CTIA survey data, 3% of the total trips to the airport can be pedestrians (the above information is supplied by Johan Brink, the Traffic Engineer).</i> It appears that the bulk of the traffic will be vehicular traffic going to the airport for work or travel and thus unlikely to carry a risk to the poultry farm. While any increase in traffic near a poultry farm is undesirable, the risk associated with airport-related traffic is not equivalent to that emanating from the nearby township.
		10. In paragraph 7 on page 252 of 416, not much can be said of CWA's response but your response indicates that the food preparation areas are to be contained within buildings with waste sorted and disposed of to a waste management facility which will take into consideration biosecurity as one of the required measures during the registration process. This goes some way to addressing our client's concern which relates to food preparation being conducted in the open with the risk of waste being exposed to the elements. Inasmuch as it is now clear that the food preparation will be indoors, the ability for the attraction of flies and rodents is somewhat mitigated.	Response from CWA: Confirmed, all food preparation and processing will be contained within buildings.
		11. In paragraph 8 on page 253 of 416, CWA respond in respect of the issue relating to the layout and the siting of the land side facilities on the west of the runway. Whilst CWA argue that such layout fits in with the MSDF and provide reasons why these facilities could not have been sited to the east of the runway, it is noteworthy that a layout placing the land side facilities to the east of the	Response from CWA: Development of the landside facilities on the western precinct is informed by a number of key considerations within the Airport Masterplan i.e. position of runway and road and rail connectivity, current and future.

		runway has not even been considered as an alternative layout. Were those facilities, or a great proportion of them, to have been placed to the east of the runway where the current airport's facilities are located, this would have allowed a far more effective buffer zone between those facilities and our client's operations.	EAP response: The concern regarding development of landside to the West of the runway has been addressed above.
		12. In paragraph 10.1 on page 254 of 416, we note Dr Petty's response regarding the removal of poultry manure on or near the site as a result of the biosecurity concerns raised by our client. We also note her further comment that adequate waste management remains important to prevent the occurrence of rodents, wild birds and other pests. This is an important concession which our client aligns itself with.	EAP response: Noted
		13. In paragraph 10.3 on page 255 of 416, Dr Petty's comment is noted. However, in the last sentence of her comment she states that "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". Here, too, it is clear that Dr Petty misses the very concern raised by our client which relates to a significant increase in human activity in very close proximity to our client's chicken houses in respect of the land side facilities proposed to be developed. At present, no such facilities exist and therefore her comment that an increase in vehicle and foot traffic is moot, is rejected by our client. There can be no doubt that if the terminal buildings, hotel, food preparation buildings and the commercial fuel station are developed well within the 1000m recommended buffer zone adjacent to our client's operations, that there will be a substantial and significant increase in the level of vehicle and foot traffic in an area extremely close to our client's operations thus potentially compromising the conceded good biosecurity protocols already in place.	Response from poultry specialist: On waste management, agreement is expressed that poor practices will negatively impact biosecurity. Waste management at the airport must adhere to the highest standards. The suggestion of a monitoring group comprising representatives from both the farm and the airport is a practical solution to ensure these standards are maintained if the project proceeds. It is noted that South African airports generally have good waste management practices, largely due to the imperative to avoid attracting wild birds, which pose a significant safety hazard to aircraft.
		14. In paragraph 10.5 on page 256 of 416, you have responded to the mitigation measures proposed to prevent the attraction of wild birds and you cross refer to page 544 of the Draft EIAR and quote from the Concept Stormwater Management Plan (Appendix 46) indicating that netting over the water bodies or bespoke products to cover water surfaces should be considered. Our client fully supports the covering of open water bodies with appropriate netting. We	EAP response: Noted Response from poultry specialist: Wild birds are unlikely to be a significant issue. Airports are designed to create conditions that are hostile to wild birds on both the airside and landside to

		also note that at the end of this paragraph Dr Petty supports the covering of the open water body with netting.	minimize bird strikes. Nonetheless, netting of any body of water on the airport property is a desirable precautionary measure.
		15. In paragraph 11.2 commencing on page 257 and continuing on page 258 of 416, Dr Petty considers the important points raised by Dr Lukhele regarding the impact of noise on our client's breeder poultry. In her response, she refers to the concern where the decibel levels rise abruptly as a result of aircraft landing and taking off. She mentions that the most likely effect resulting from this is a startle response and possible pile-ups and as a result of that, suffocation. She then suggests that it has been shown that with careful management habituation occurs within five events. She then refers to her updated Poultry Biohazard Assessment (Appendix 35) to the amended Draft EIAR for a more complete explanation. We shall deal with this in more detail below but at this juncture, in dealing only with the CRR, we record that our client does not accept the concept of habituation in the manner suggested by Dr Petty. Our reasons for saying so will be set out when dealing with her updated assessment below.	EAP response: Please refer to the detail response provided by the poultry specialist below.
		16. In paragraph 12.1 on page 259 of 416, we note the response to the effect that the exclusion of chicken manure as a feedstock to the biodigester has found its way into the Amended Geohydrological Assessment. In paragraph 12.2 on page 260 of 416, we note GEOSS's concession that proper management of groundwater resources are essential in preventing impacts on neighbouring groundwater uses. In fact, it is pleasing to note that most, if not all, of the comments raised by us on our client's behalf in respect of the GEOSS assessment have been conceded by them.	Response from GEOSS: Comment noted
		17. In paragraph 12.7 commencing on page 261 of 416, GEOSS refer to the fact that an official Groundwater Monitoring Action Plan has not yet been compiled and that this will be done if the development is approved. They go on to state that the reason for doing so is that there could still be possible revisions to the SDP of the development due to environmental requirements. They state that 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 but the question remains to what extent neighbouring groundwater users such as our client will be able to comment upon and contribute to such plan. In chapter 12 of the GEOSS	Response from GEOSS: Comment noted EAP response: this comment is reiterated by the IAP below and is responded to.

	assessment (Appendix 3) the parameters of such a plan are set out. We shall comment on this in more detail when dealing with the amended GEOSS assessment below.	
	18. In paragraph 13 on page 262 of 416, the Visual Impact Assessment Specialist responds to the concerns raised on our client’s behalf in respect of light pollution. We note that at the commencement of the response, the specialist states that 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”. That being so, one must question the reliability of the assessment and its proposals to mitigate light pollution. We note on pages 263 of 416 and following, the specialist’s reference to lighting mitigation measures that have been addressed in the light of the concerns raised by us on our client’s behalf and while some of these do address the concerns raised (such as the specification of low level single ‘bollard’ type lights along roads and motion-activated security lighting), we record a concern in respect of the comment that 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. This is clearly a reference to the Land Use Management process and possibly Building Plan Approval process and it is not clear to what extent such a report will be made available for public comment. Deflecting this important issue in this way, which the specialist concedes is a relevant concern for our client, may constitute a situation of “too little, too late”. The competent authority deciding on whether to grant environmental authorisation for this project, should insist that such uncertainty be eliminated at this stage and before authorisation is granted; alternatively a condition of approval should be imposed requiring a full public participation at the SDP stage.	Response from visual specialist: • The objector’s concerns are noted. • The VIA calls for the following (see 7.3.1.a.iv): “An Overall Lighting Report should ... be prepared at SDP stage by a suitably qualified electrical engineer, to be submitted to the City of Cape Town for comment and approval. ○ The purpose of this report would be to provide accurate demonstration sketches of the illumination conditions (individual and cumulative) generated by the various light sources within the CWA development that would result in light pollution. ○ The report should include the relevant luminaire data, scenes, charts and renderings to illustrate expected illuminance, colour temperatures, light trespass, controls and proposals for the control of backlight, uplight, and glare; and the development’s contribution to skyglow.” • Under the sub-heading “Plans and Guidelines required to accompany all future Site Development Plans” the VIA calls for the following (see 7.3.1.b.iv): “A detailed Lighting proposal (for all outdoor lighting, façade lighting (if any), street lighting and security lighting – i.e.; all light sources that would be visible from within the Receiving Environment). The lighting proposal must demonstrate that lighting design has been undertaken in such a way that the sensitivities of the adjacent Cultural Landscape and the relevant scenic routes have been (a) taken into consideration, and (b) that design 2 responses have been included in the design proposal in a positive way. The lighting proposal should include: ○ A consolidated lighting layout showing the location of all sources of light.
	19. At the bottom of page 263 of 416, the specialist records that it is not expected that the lights associated with the airfield will effect the breeder complex directly. The reasons proffered are not all that clear to our client as by comparison with the Cape Town International Airport which is hugely illuminated at night both in respect of the air side and land side facilities, it is hard to imagine how such illumination will not impact directly on our client’s chicken houses. This notwithstanding, the suggestion that all street lights in the	

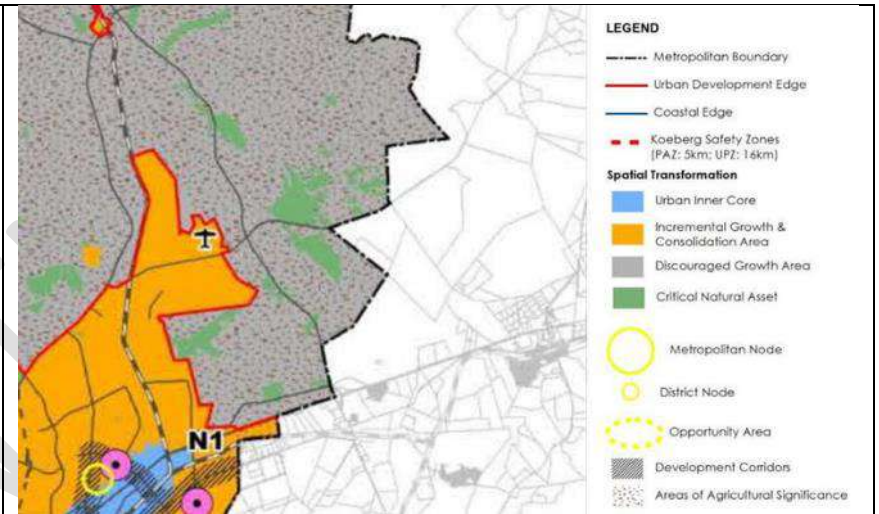
		vicinity of our client's complex be installed in such a manner that the focus point will be away from the complex, is supported as is the level of illuminance being kept below 10 lux. We note that the specialist has indicated on page 264 of 416 that the CWA engineer has supported the remedial measures related to the directionality of luminaires by ensuring that the focus point is angled away from our client's complex and that this can be demonstrated in the lighting report at SDP level. Once again, our client can only meaningfully comment thereon at that stage.	○ The lighting proposal should include basic technical/specification details for all sources of light. ○ The information provided should enable: i. the visual specialist to properly scope and model/simulate visible light sources (if necessary); ○ and the CA and/or the visual specialist to make an informed decision regarding the acceptability of light impacts at night." • Under the sub-heading "Specific Mitigations and Conditions of Approval" the VIA calls for Visual Statements as well as detailed landscape proposals for the western edge of the General Aviation Precinct and the south western corner of the Airport Terminal Precinct to address concerns regarding the possible impacts of lighting on the adjacent poultry breeding facilities at SDP phase. The aim of this input would be to ensure that visual impacts are managed as priority in the detailed design development in future planning & approval phases; and to determine if the impact assessment findings of this report are affected. • 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.). • Finally, and perhaps most importantly, the Town Planner, Japie Hugo has received confirmation from Llewellyn van Blerk (the Land Use case officer for CWA in the District Planning Office), that the neighbouring property owners will be given the opportunity to comment on the SDP and that such comments from the public will be considered by the City in the process at that stage. Conclusion

			In the opinion of the visual specialist, the project team have provided sufficient detail to scope and assess the anticipated visual impact of lighting at this level of the planning & approvals process, and these results have been reflected in the IA tables of the final VIA, as well as in the mitigation measures. No further remedial actions are available to the visual specialist at this time: a) The VIA has already been updated to include the level of detail available at this time. b) Lighting mitigation measures to be applied at EIA stage have included 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). c) The visual impact assessment was re-considered in the last revision to include the assessment of the visual impact of lighting on the County Fair birds explicitly. d) Any further issues will be dealt with at SDP phase, where both an electrical engineer and a visual specialist will be involved in ensuring that the concerns of sensitive receptors have a voice in the future statutory planning process. As the visual specialist I am satisfied that the environmental impact of lighting on the County Fair breeder complex can be managed sufficiently through the mitigation measures proposed.
		20. On page 266 of 416, in dealing with dust suppression, notwithstanding the specialist's own 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" the specialist responds by suggesting that dust monitoring along the western boundary of the site should be conducted on a monthly basis during construction and that if 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	Response from specialist: The statement in the Air Quality Impact Assessment notes that dust emissions can be reduced by approximately 90% through the use of dust suppression chemicals (emulsions). However, this is provided in the context of outlining the maximum theoretical control efficiency, not as a blanket requirement for all situations.

		introduced. This watering down (excuse the pun) of the specialist's own recommendation is unjustified and our client continues to insist that emulsions be added to the water suppression to minimize the dust fall out on our client's adjacent breeder complex.	The proposed approach, i.e. implementing standard water-based suppression first, with the conditional use of chemical emulsions if necessary, is both reasonable and widely accepted in environmental management, for several key reasons: 1. The strategy follows the adaptive management model, where mitigation measures are: - o Monitored and adjusted based on actual site conditions, not assumed worst-case scenarios. - o Scaled appropriately to the measured level of impact. Monthly monitoring at the County Fair receptor (adjacent to the breeder complex) serves precisely this purpose: to identify if dust fallout exceeds 70% of the residential limit, and to trigger the use of chemical emulsions only if necessary. This avoids unnecessary chemical application, which can have cost, environmental, and ecological implications of its own, including runoff and soil interactions. 2. Best Practice, since this approach is in line with: - o The National Dust Control Regulations (2013), which set limits and define acceptable fallout rates. - o SANS 1929, which guides the siting and interpretation of dust fallout monitoring. - o Environmental control norms, which favour graduated and proportional responses based on measured risk, not presumed outcomes. It should be noted that emulsions are not dismissed, but are included as a second-tier control, deployed based on evidence from ongoing monitoring.
		21. On the same page, we note your response in paragraph 14.3 and will accordingly deal with this aspect further when dealing with Dr Petty's amended assessment.	EAP response: Refer to the detail response provided by the poultry specialist below.

		22. At the bottom of page 268 of 416 continuing on to page 269, we note that the response from the socio economic specialist indicates that the final report “will include comments more specifically related to County Fair”. We have scrutinised the final report and cannot find the comments suggested. The CRR continues on page 269 to deal with mitigation options which are a reference to the current confidential discussions between CWA and our client, which discussions, according to our instructions, have now ceased. Our comments in this regard as set out above apply with equal force to this particular paragraph which we are not sure is part of the specialist’s response or your own. The final paragraph of paragraph 16.3 is rather puzzling. This is because one of the mitigation options involves the relocation of our client’s operations. If that were to eventuate, our client’s current workforce on its complex drawn from the Fisantekraal community will all lose their employment. To therefore state that our client will not suffer any net job losses is misleading. Our client’s current workforce on the complex will be replaced with a workforce drawn from the area to which its operations will relocate and therefore based on that mitigation, it is clear that our client’s permanent employees numbering 79 individuals will become unemployed. The specialist has not addressed this contingency at all.	Response from socio-economic specialist: County Fair’s concerns related to potential job losses were noted and addressed on p. 77 of the revised report: Representatives from County Fair voiced concerns that an airport adjacent to the Fisantekop laying farm would significantly impact their operations. Current operations account for about 38% of County Fair’s total laying stock in the Western Cape. The permanent workforce of 79 people is drawn from Fisantekraal, working or servicing the four farms, Quarryside, Wheatlands, Fisantekop and Vergelee. These employees are at risk of losing their jobs if operations have to be relocated. They are also concerned about light and noise pollution, which would seriously impact the laying stock. The laying stock is susceptible to disease and infection, and isolated and remote areas (such as Fisantekop) were chosen to develop the laying operations to minimise the risk of diseases.
		23. In paragraph 18 of the CRR, the planning specialist responds to a number of our client’s concerns raised in connection with Spatial Policy and Land Use Rights. We note that the specialist states on page 274 of 416 that the broader context of food security indicates that the proposed development’s impact on the County Fair breeder complex is not significant and basis this on the proposed mitigation measures. For all the reasons previously set out in our previous comments and herein, our client denies that the impact of the proposed airport expansion on our client’s breeder complex is “not significant”. On the contrary, our client maintains that the impact is significant. On page 275 and continuing on page 276 of 416, the agricultural specialist lists various statistics in order to downgrade our client’s statement that the Fisantekop complex contributes some 38% of our client’s broiler stock in the Western Cape (our emphasis). Utilising National statistics, in order to downgrade this percentage to 3.2% is false arguing. This is because County Fair as a division of Astral Foods, supplies poultry in the Western Cape. Other divisions of Astral Foods supply poultry products in the other provinces, for example, Goldi and Festive in the Northern	Response from town planner: Noted (App-29C-In-Process-draft-EIAR-CR-Report-Sanitised-pw-web). Response from agriculture specialist: Food security is one of the key concerns of the National Department of Agriculture, Land Reform and Rural Development (DALRRD) when it comes to the evaluation of the protection of agricultural resources. The statistics were listed to provide context of the role of the Fisantekop complex in terms of food security and NOT to downgrade the I&AP’s statement. As food security is of National strategic concern, it is completely relevant to provide the national perspective of this operation. However, to only consider the contribution of the Fisantekop complex within the Western Cape context – which could be as

		Provinces and Mountain Valley in KZN. The fact remains that the contribution of the Fisantekop complex to the production of poultry products in the Western Cape is in the order of 38%.	high as the 38% reported by the I&AP – has the potential to over-inflate the importance of this facility. It was further specifically mentioned that the calculated 3.2% contribution of the Fisantekop complex at a National scale, “is certainly not insignificant”.
		24. It is also noteworthy that the planning specialist repeatedly relies on the so-called inevitability of our client’s Fisantekop complex having to relocate due to the future expansion of the Greenville Garden City development and other developments in the area. This reasoning is rather circuitous and ignores the following important facts: the fact that agreement was reached between our client and Garden Cities which specifically catered for the long term biosecurity needs of the Fisantekop complex. The development of Garden Cities therefore is not a factor that would cause our client to relocate its complex. The Bella Riva development, which despite having been authorised in 2014, has not been developed at all in the intervening 11 years. Here, too, an agreement was reached with the proposed developer of Bella Riva to include non-development zones between our client’s complex and the proposed golf course estate. These developments were approved on the basis of the agreements reached. Our client therefore remains of the view that the CWA proposed airport expansion project is the only reason at this juncture in time which impacts negatively and significantly on its operations.	Response from town planner: It is clear that the growth of the City has overtaken this facility which is not part of the City’s long-term planning for this area. The City’s Northern District Plan. Approved – Vol. 3: Implementation Plan states on page 3: “B. Lucullus Road <i>Extension of Lucullus Road to the north to Lichtenburg Road as well as upgrade of the interchange onto the N1 Freeway in order to facilitate development of further phases of Greenville, as well as a future mixed-use employment node to the north of the smallholdings”.</i> As previously responded to comments by this I&AP, 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.



MSDF Consolidated Spatial Concept (Source: MSDF Vol 1, approved January 2023 by City of Cape Town)

Furthermore, the Northern District Plan identifies the County Fair site as a potential area for industrial development.

		A map of the Northern District Plan 2023. It shows two main areas, 5 and 6, outlined in red dashed lines. Area 5 is orange and Area 6 is yellow. A blue square labeled 'Fisantekraal WWTW' is in Area 6. A yellow square labeled 'FISANTEKRAAL' is in Area 5. A red arrow points from the bottom towards a location labeled 'COUNTY FAIR' in Area 5. There is also a green area labeled 'TENSBURG' near the arrow. Northern District Plan 2023 (accent added – red arrow showing location of County Fair). Due to broader urban development pressures, improved road infrastructure leading to increased population growth, and the close proximity of other poultry operations by modern standards, this chicken breeding facility is becoming less compatible with its current location. While long-term relocation may be necessary, the complex can continue to operate alongside CWA with the necessary mitigation measures.
	25. In paragraph 19.1 on page 278 of 416, GEOSS responds in regard to the Groundwater Management Plan and invites comments on chapter 12 of its report which it advises will be collated when the final Groundwater Monitoring	Response from GEOSS: Comment noted

		Programme must be submitted. As indicated in paragraph 17 above, we shall address this aspect and provide our client's comments when dealing with the amended GEOSS assessment below.	
		26. On page 279 of 416, amongst the responses ascribed to the visual impact assessment specialist, it is stated that "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". In this regard, we refer to our comments set out in paragraphs 18 and 19 above. While conceding that an EMPr is a living document that can be amended from time to time, it is unacceptable that the specialist report may be further reviewed and amended at the SDP stage. This defeats the purpose of a thorough EIA process so as to inform the competent authority not only on whether to grant an environmental authorisation but to inform the conditions which it would impose as part of such authorisation. In short, this response is too open ended and does not enable our client to adequately deal therewith at this stage.	Response from visual specialist: Refer to the response provided to point 18 and 19 above. EAP response: No further review of specialist reports for the introduction of new information is envisaged at this stage.
		27. On page 280 of 416, you respond to our client's concern about outdoor cooking and quote that the EMPr states on page 197 that "no open fires may be lit anywhere on the construction site, except at locations approved by the ECO and Site Manager". Not only is this unsatisfactory in the sense that open fires will be allowed at locations to be approved by the ECO and Site Manager thereby presupposing outdoor cooking, but you have not addressed our client's concern which was to the effect that the EMPr should prohibit all forms of outdoor cooking within the contractor's construction camps. In fact, our comment in this regard listed in paragraph 19.6 on page 280 is largely unanswered.	EAP response: The correct response was that Page 197 of the EMPr in fact states "<i>No outdoor cooking of any form or open fires are allowed.</i>"
		28. Also on page 280 of 416 in responding to a comment we made on the WULA Technical Report, GEOSS responds that it advises the client and CWA to work with other groundwater users to establish a Groundwater Monitoring Committee to ensure that all parties involved manage the groundwater resource optimally. Needless to say, our client supports this recommendation and would gladly serve on such a Committee.	Response from GEOSS: Comment noted

		29. Commencing at the bottom of page 280 of 416 and continuing over the following pages, you have responded to our criticism in paragraph 21 of our letter dated 13 January 2025 by now providing adequate responses. At the bottom of page 281 of 416, you state that as long as there are no open bodies of water and sedimentation dams, the on-site sewage treatment plant will have no impact on poultry. You furthermore state that should the development of an on-site package treatment plant be authorised, the implementation of appropriate and mitigation measures will ensure that biosecurity risks are effectively managed. In the absence of being able to consider the design and proposed mitigation measures, it is impossible for our client to assess the potential impact of such on-site treatment plant on its biosecurity. For this reason, our client maintains its opposition to an on-site treatment plant and requires the competent authority to refuse same and to make it a condition of any authorisation that all sewerage be pumped to the existing Fisantekraal WWTW.	EAP response: The comment is noted. The design of the on-site WWTW will be finalised during design stage, taking requirements from the EMP and specialist reports into consideration. A dual solution of sewage to Fisantekraal WWTW and on-site treatment is being applied for.
		30. On page 283 of 416, you deal with the aspects relating to our client's workforce which is a repeat of aspects already covered by us in paragraph 22 above.	Specialist response: See response to comment 22.
		31. On page 284 of 416, you mention the recommendation to exclude chicken manure as a feedstock for the biodigester and that it will be consistently reflected across all reports in the amended EIAR. This appears now to have been implemented.	EAP response: Noted
		32. On page 285 of 416, we note your statement in paragraph 24.1 that a formal groundwater management plan will be included as a condition of approval in the Environmental Authorisation. In this regard, we refer to our comments above regarding the fact that no such plan is yet available for public comment but we also refer to our comments on chapter 12 of the GEOSS report below.	Response from GEOSS: Comment noted EAP response: the plan will be developed with specialist and authority input.
		33. Between pages 288 and 291 of 416 of the CRR you set out Dr Petty's responses to the letter dated 29 November 2024 by Dr O Lukhele. While we shall deal with Dr Petty's amended assessment below, because we are dealing at this stage with your CRR, we set out some brief comments on her responses:	-

		33.1. Dr Petty's comments commencing at the foot of page 288 and continuing on the top of page 289 are noted. We note her reference to the fact that the recommended distance of 1000 m between our client's farms on the Fisantekop complex are absent. While this is correct, it is not significant because of the stringent biosecurity measures in place which are mentioned by Dr Lukhele, with whom she agrees. As set out by us in paragraph 8 above, the outbreak of avian flu in 2017 on one of the farms did not spread to the others because of the stringent biosecurity measures in place. 33.2. In regard to her further comment on page 289 that 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" we comment as follows. It seems that Dr Petty is viewing the term "increased traffic" in a very narrow sense, namely, vehicular movements. The current situation at the Fisantakop complex with traffic passing the complex on the R312, is not a threat to our client's biosecurity. However, the mere fact that the land side facilities comprising facilities which will attract large numbers of human beings in very close proximity to our client's breeder complex, is the concern which Dr Lukhele raised and which has not been satisfactorily addressed by Dr Petty. Therefore, her throw away line that "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," is incorrect. The anticipated volumes of human activity so close to our client's nearest chicken houses once the land side facilities have been developed, will undoubtedly increase the potential for our client's biosecurity to be breached and therefore this issue is most certainly not "moot".	Response from Poultry Specialist: The concerns regarding increased human activity, proximity of landside development, potential for increased traffic, and wild birds as well as waste management practices are acknowledged as relevant biosecurity considerations. The core question, however, is whether the airport and farm can coexist without harm to the poultry farm, and if so, the significance of the airport's impact on farm biosecurity. Any increase in traffic, both foot and vehicular, inherently affects biosecurity. This is discussed below: It is crucial to consider the existing biosecurity context of the poultry farm. The farm is currently located 600m from a township, a proximity that carries significant biosecurity risks. It is highly probable that township inhabitants keep poultry and may purchase cull chickens from other operations, which is a major pathway for disease introduction. This existing proximity and associated traffic would have likely contributed to the HPAI outbreak referenced in paragraph 8. The HPAI outbreak, despite the farm's excellent procedural biosecurity, represents a failure of the overall biosecurity situation, indicating that the farm's location has become a persistent biosecurity risk. Therefore, the current traffic on the R312, which includes cull trucks, manure transport, and poultry workers from other farms, remains a significant, if not the greatest, biosecurity concern. The quality of traffic associated with the airport is distinct; individuals traveling to or working at the airport are unlikely to be transporting disease vectors such as cull chickens or dead wild birds. <i>Currently Melish Road carries very low traffic volumes. Future traffic will mostly be airport-related. There is an estimate of a total of 700 vph in both directions for phase 1 with a approximate 50:50 split (i.e 350 vehicles per hour per direction). Also note that when the East-West link road is connecting the proposed Bela Riva development with Melish Road, future traffic from this development may use Mellish to access Lichtenburg Road towards Stellenbosch and we assumed approximately 100 vph from Bela Riva. The expected number of pedestrians are very difficult to estimate at this stage. Based on the CTIA survey data, 3% of the total trips to the airport can be pedestrians (the above information is supplied by Johan Brink, the Traffic Engineer).</i>

			It appears that the bulk of the traffic will be vehicular traffic going to the airport for work or travel and thus unlikely to carry a risk to the poultry farm. While any increase in traffic near a poultry farm is undesirable, the risk associated with airport-related traffic is not equivalent to that emanating from the nearby township.
		33.3. In regard to the issue of noise dealt with on page 290 of 416, which Dr Petty confirms is a significant factor and which she expands upon in her amended report, appears to be played down by her by reference to a study conducted on turkeys which she assumes would also be applicable to poultry. In this regard, we deal with this in more detail when commenting on her amended report below but at this stage record that the concept of habituation occurring with careful management, is not accepted by our client. The question posed by our client's representatives is a rather simple one : what explanation can Dr Petty give regarding the concept of habituation and what does she mean by "careful management"?	EAP response: Please refer to the detail response provided by the poultry specialist in point 34.3 below.
		33.4. In regard to vibration being an issue which impacts on our client's breeder stock (also dealt with on page 290), we will deal with this when commenting on her amended assessment below. However, Dr Lukhele has pointed out that his sentence "the location of animal farms near workshops, railways, construction sites and other such areas, induce stress from ground borne vibrations" is not directly comparable to Dr Petty's response that the "vibrations referred to are largely as a result of roads and equipment in the (chicken) house ...".	EAP response: Noted. Please refer to the detail response provided by the poultry specialist in point 34.4 below.
		33.5. Finally, Dr Petty comments on the impact of light pollution at the bottom of page 290 and the top of page 291 of 416 and concedes that extraneous sources of light at night will affect the circadian rhythm of the birds and therefore the egg laying. However, it is not clear where she gets her numbers of aircraft landing and taking off at night from. Once the expanded airport has been fully developed, there surely will be more than just 3 flights landing and taking off before 11 pm each night. The mitigation measures suggested by the visual impact specialist have already been dealt with us in paragraphs 18 and 19 above and, as stated	EAP response: Noted. Please refer to the detail response provided by the poultry specialist in point 34.4 below.

		by us therein, are rather inchoate until such time as a overall lighting report and specification is available for comment.	
		Comments on the Amended Draft EIA Report As we did previously, we propose limiting our client's comments to those areas of concern to it and the impacts of the proposed development on its operations and furthermore, we shall do so with reference to the relevant specialist studies. Once again, to make more sense of our client's comments, we will do so thematically.	-
		34. Amended Poultry Biosecurity Assessment 34.1. We note that page 5 of the amended assessment is new and in Figure 1 the author depicts our client's farm and the surrounding activities. Importantly, she notes "that the landside section of the airport will be developed very close to the farm". She also states below Figure 1 that there has always been an airfield in the vicinity of our client's farm and that therefore many of our client's concerns about wild birds, rodents and people, are existing biosecurity concerns. The existing airport's land side facilities as depicted in Figure 1 demonstrate how far from our client's boundary and chicken houses those facilities are and that therefore the concerns expressed by our client are not on its doorstep. We have already commented above on the existing biosecurity concerns and would refer to what we have stated above.	Response from Poultry Specialist: Please refer to the response provided to 33.1 and 33.2 above. Regarding the comment about the farm being built before the 1982 WOAHS biosecurity standards were introduced, while understandable; its relevance to the current situation in 2025 is limited. The issue is that the farm's surrounding environment has evolved, introducing biosecurity challenges that were not present at its inception, a common occurrence in South Africa. The closure of the Midrand Rainbow breeder farms due to similar developmental pressures serves as a pertinent example. To mitigate the biosecurity risks associated with the airport's access road, the implementation of a solid and high wall (at least 1.7m) is essential to block the farm from the airport.
		34.2. Dr Lukhele has considered the amended assessment and has indicated that Dr Petty did not respond to the adoption of the Biosecurity Procedures in Poultry (Chapter 6.5.1) by the World Organisation for Animal Health (WOAH), previously OIE, that happened in 1982, many years after our client's complex was built. In addition, Dr Lukhele states that the compounding effect of the anticipated additional disturbances from light and noise as well as increased biosecurity risks (people movement, vermin activity, open quarries, dust, etc. during construction and post-commissioning) to the current farm set-up at our client's Fisantekop complex have not been completely addressed. He concedes that some of the proposed mitigation measures could be effective if implemented well at all times.	On waste management, agreement is expressed that poor practices will negatively impact biosecurity. Waste management at the airport must adhere to the highest standards. The suggestion of a monitoring group comprising representatives from both the farm and the airport is a practical solution to ensure these standards are maintained if the project proceeds. It is noted that South African airports generally have good waste management practices, largely due to the imperative to avoid attracting wild birds, which pose a significant safety hazard to aircraft. Finally, wild birds are unlikely to be a significant issue. Airports are designed to create conditions that are hostile to wild birds on both the airside and landside to minimize bird strikes. Nonetheless, netting of any body of water on the airport property is a desirable precautionary measure.

			Dr Lukhele expresses concerns about the compounding effect of some of the increased biosecurity risks associated with the development (noise, dust, light etc.) There is very little research on compounding effects however this comment highlights the importance of mitigation in minimising the effects of the issues mentioned.
		34.3. At the bottom of page 16 and the top of page 17 of the amended assessment upon which both CWA and yourselves rely, Dr Petty states: “based on experimental studies and interviews with growers, panic piling and crowding behaviour occurs only in naïve birds and is extinguished within 5 exposures to a startling stimulus (usually within 2 exposures). The threshold for the naïve response in turkeys can be estimate at around 85-95 dBA. Below this threshold, severe crowding does not occur, and above it, crowding is likely to occur. The response is likely to be the same in chickens”. Dr Lukhele’s comment hereon is as follows: Dr Petty’s November 2024 report (page 19) stated that “All scenarios remain below the 80 dB level associated with harm to poultry and are only slightly higher than current levels”. Dr Lukhele is not sure if Dr Petty’s revised assessment implies that the threshold for “harm to poultry” has increased. In addition, he made mention in his formal reply (his letter of 29 November 2024 at page 3) that “small changes of 10 dB is enough to have a significant impact in inducing tonic immobility (TI) or fear duration. 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 3 to 4 days reduced egg production”.	Response from poultry specialist: The concerns regarding aircraft noise, habituation of poultry to noise, and ground-borne vibrations are addressed. Dr Lukhele seems to think that the revised assessment implies that the threshold for harm to poultry has increased. However, the original biosecurity and health assessment (quoted below, references can be obtained from the report) clearly stated greater than 80dB as a common level for concern and indeed this may even be higher as shown in the paragraph below. I am not sure why he thinks this has changed. It is worth noting that a single short stress does not affect egg production but continuous stress does (his quote). The noise effect is a series of short stresses not one long stress. Turkeys are quoted in the studies on noise effects as they are commonly accounted to be more sensitive than poultry to noise, however there are a number of studies involving poultry of all kinds that are quoted showing minimal to no impact of aircraft noise. I quote from my report. There are studies that show that poultry exposed to 80 decibels (dB) levels of noise had decreased growth (Voslarova, et al., 2011). Another study by McFarlane (McFarlane, et al., 1989) and colleagues in 1989 in which Hubbard x Hubbard chicks were exposed to continuous noise up to 95 dB from day 10 to day 17 found that noise did not influence weight gain, feed intake or behavioural traits in broiler chicks. In addition, studies have shown that loud noises such as found near airports, railroad tracks or loud hydraulic or pneumatic equipment and machinery close to the chickens leads to lower egg production, stunted growth, higher blood pressure, stress and fatigue in the chickens (Cons, 2016). No effects on growth of fowl were detected in experimental studies of the effects of jet overflights, helicopter overflights, and sonic booms (Stadelman, 1958a; Cottureau, 1972; Kagan and Ellis, 1974; Von Rhein, 1983). Sample sizes were large enough in those studies to detect

			subtle differences in growth rate (Department of Defense Noise Working Group, 2023). It will be important to mitigate the noise of vehicles passing past the site. To this end, erection of signage, bumps etc should be considered. During the construction phase, trucks and heavy machinery should make use of other roads as much as possible. Habituation to noise The process of habituation is described below: Habituation to loud sounds in poultry, similar to other animals, is a well-established form of non-associative learning where repeated exposure to a stimulus leads to a decrease in response. When exposed to consistent aircraft noise, chickens can learn to become less reactive. • Initial Startle Response: Chickens will initially exhibit a startle response, including behavioral (freezing, alarm calls, escape attempts) and physiological (increased heart rate, stress hormones) reactions. • Repeated Exposure: Consistent exposure without negative consequences allows the chickens' nervous system to recognize the sound as non-threatening. • Neurological Changes: Habituation involves neurological mechanisms such as decreased neural firing in auditory and fear-processing pathways, synaptic depression, and increased inhibitory mechanisms, leading the brain to "filter out" the irrelevant stimulus. • Behavioural Manifestations: As habituation progresses, there will be a reduced startle response, a faster return to normal behaviour (feeding, preening), and potentially lower levels of chronic stress indicators. Factors influencing habituation include the predictability, intensity, and frequency of the sound, the context of the sound (e.g., absence of predators), individual differences, and age. Critically, the N70 day night contours indicate poultry exposure to 70dB for 10 20 events daily, and no noise events at night. Historically, there have been very few documented instances of significant

			poultry mortality due to aircraft noise. Comprehensive studies, including those referenced in the Department of Defense Noise working group technical report, have shown no production losses in broiler or laying flocks exposed to noise levels as high as 99 dBA from various aircraft. Since most of the aircraft noise at the CWA will occur during the day, the presence of calm poultry workers walking through the house will be important. The normal precautions that are taken to prevent pileups (blocking off corners etc should be taken). It should be noted that since the flocks will be exposed initially during rear, habituation should be completed before the onset of lay.
		34.4. In regard to the question of vibrations dealt with in Dr Petty's amended assessment on page 17, she states that "... vibrations referred to are vibrations of the birds as the result of road transport and machinery in the poultry house and not as a result of noise". Dr Lukhele states that while this statement is correct, Dr Petty is missing the departure point of this argument that "vibration stress physiology is closely related to noise stress as they are both energy waves". Against this point, Dr Lukhele highlighted that the location of animal farms near workshops, railways, construction sites and other such areas induce stress from ground-borne vibrations. Sound vibrations greater than 1.0 cm s⁻¹ have a negative effect on egg production. He concludes that neither CWA nor Dr Petty have quantified the impact of vibrations on our client's breeder flock.	Response from poultry specialist: Regarding vibrations (33.4, 34.4 ,34.5, 34.6), the intensity of sound-borne vibrations is directly related to sound wave intensity, which decreases significantly with distance (inverse square law). Therefore, evaluating sound wave intensity allows for inference of vibration effects. For vibrations to be significant, the source must be very close to the birds. An 80 dB sound pressure level corresponds to a particle velocity in air of approximately 0.05 cm/s. Solid surfaces like concrete, bricks, and wire vibrate less easily, requiring more energy. Given that poultry exposure to sound is expected to be less than 80 dB, and any solid structure will experience even less vibration, it is clear that vibrations are not a significant factor. The reference to vibrations greater than 1 cm/s impacting egg production is thus not applicable to the expected airport-related vibration levels.
		34.5. On page 22 of the amended assessment in dealing with noise, Dr Petty recommends the following mitigation measures: "Ensure good management when birds are introduced onto the farm and are being habituated to the unaccustomed noise". Dr Lukhele comments that he is not sure how our client will practically "train" the birds to the noise, including the vibrations, from different sizes and types of planes that will be landing and taking off from the expanded airport. Perhaps Dr Petty	EAP response: Refer to the detailed responses from the poultry specialist in point 34.3 and 34.4 above.

		would care to define what “good management” should be employed to address this concern.	
		34.6. Dr Petty’s reference to the impact of increased noise in studies conducted in respect of turkeys and her assumption that the response of the poultry is likely to be the same as for turkeys, is questioned by our client. If Dr Petty’s assumption is incorrect and the impact of the elevated noise levels from a fully operational international standard airport demonstrates that the poultry cannot be habituated with the same level of confidence as turkeys, our client may well suffer substantial financial losses due to the increased mortality rate of the laying stock and the negative impact on their productivity. In this regard, Dr Lukhele comments that while these losses cannot be quantified except with reference to peer-reviewed literature, what has been highlighted is in line with the main objectives of Dr Petty’s report – welfare (WOAH’s 5 freedoms) and biosecurity. The increased and sudden noise due to aircraft landing and taking off will result in production losses, stress-associated physiological changes including immunosuppression and later mortality. Our instructions are that for each 1% loss of laying hens per 40,000 hens per chicken house, a total of just over R1 million is lost. This takes into account the loss of the bird itself, the loss of the egg laying over the bird’s lifecycle and the cost of outsourcing broilers to make up for the loss in broiler production. For the four active farms on the Fisantekop complex, a 1% loss of laying hens would equate to R4 million. Therefore, if the loss over a cycle would equate to a 10% loss, the potential financial losses to our client could be in the order of R40 million (or anywhere between R4 and R40 million).	EAP response: Refer to the detailed responses from the poultry specialist in point 34.3 and 34.4 above.
		34.7. On page 19 of the amended assessment, Dr Petty correctly reflects that our client’s complex uses Municipal water supplied by the City of Cape Town. However, she overlooks the fact that our client also uses groundwater from its boreholes for cooling the chicken houses during the hot summer months. For this reason, our client’s concerns regarding a diminution of its groundwater supply have been raised and have been acknowledged by GEOSS in its assessments.	EAP response: The Groundwater Impact Assessment does acknowledge that the IAP uses groundwater on site. Note the IAP has since indicated that their borehole HBH6 has dried up.
		35. Amended GEOSS Groundwater Impact Assessment	Response from GEOSS:

		35.1. In dealing with pollution sources, we note that at the bottom of page 35 and continuing to the page of 36 of the amended GEOSS assessment, reference is made to the exclusion of chicken manure from the proposed biodigester and it is stated that the feedstock will be comprised of treated effluent from the WWTW and cultivated biomass/energy crops. In addition, organic waste from the site may be used to supplement the feed. Treated biosolids from the WWTW may also be used to supplement the feedstock on condition that they are not tested to be hazardous. This recordal of the exclusion of chicken manure is as a direct result of our client's previous objections, but the potential for groundwater contamination will remain as a result of the types of feedstock being proposed. Biological pathogens are also present in treated effluent and therefore have the potential to contaminate groundwater. Groundwater monitoring will therefore remain a significant mitigating measure.	Comment noted, biological parameters such as E. coli, total coliforms and heterotrophic plate count remain recommended parameters for monitoring due to the potential risk.
		35.2. In chapter 12 commencing on page 75 of the amended assessment, the specialist recommends a proposed groundwater monitoring plan. We note from Map 10 on page 79 that two monitoring boreholes (MBH9 and MBH10) are proposed on the boundary between the proposed expanded airport site and our client's adjacent breeder complex. It is noted that these two monitoring boreholes are some distance away from our client's existing boreholes and because one is dealing with a fractured aquifer, the monitoring boreholes may not necessarily reflect the situation in regard to the aquifer from which our client abstracts its groundwater. The same would apply to other surrounding groundwater users and one would therefore have thought that it would have been prudent to have sited some monitoring boreholes outside of the property borders of the proposed expanded airport, with the consent of the relevant landowners, so as to ensure adequate monitoring of the groundwater used by the surrounding landowners.	Response from GEOSS: This concern is noted. Due to the variable nature of the fractured network, there is no guarantee that monitoring of boreholes on neighbouring properties would be a sole reflection of impacts from the development. The proposed boreholes suggested in the proposed groundwater monitoring programme were selected due to their proximity to activities classified as high risk. Consequently, these boreholes on the property would serve as 'first warning' sites. Should concerning impacts be observed in these boreholes, collaborative decisions can be made by the monitoring committee to extend the monitoring network if mitigation measures do not resolve the impacts.
		35.3. On page 229 of the Amended Draft EIAR it is stated that the strategy for water supply to CWA is one of a phased approach and entails using groundwater as a primary supply source in the short term up until Municipal infrastructure can either supplement the groundwater supply or be the primary source of supply. Inasmuch as it is envisaged that	Response from GEOSS: This concern is duly noted, as such monitoring of groundwater levels are recommended and will be essential. Should the water levels decline, mitigation measures, which include cessation of abstraction until recovery,

		groundwater will be the primary supply in the short term, it renders the question of monitoring all the more important as, for the reasons already stated by us in previous comments and above, our client cannot suffer a diminution of its groundwater supply as it utilises groundwater for the cooling of the chicken houses during the hot summer months. Furthermore, most of our client's boreholes at its nearby Hocroft processing plant have all but dried up since they were drilled in 2018/2019 due to the increased extraction by farmers in the area. Our client has a serious concern regarding the impact of the intended groundwater abstraction from the CWA boreholes and the impact this may have on the remaining groundwater resources at Hocroft.	have been recommended to prevent long-term impacts on neighbouring users.
		35.4. In paragraph 12.4 on page 77 of the amended GEOSS assessment, details of the monitoring frequency and parameter analysis are proposed. It is noted that the following is stated in the second paragraph thereof: "Once the site is developed and the intricate details of the services are made available, a more detailed, standalone monitoring programme report will need to be developed". The concern that our client has in this regard is that the author is proposing a detailed monitoring programme after the development of the expanded airport. This may well be a case of "too little, too late", if during the construction for the development the abstraction of groundwater (being the primary source of water supply in the short term) materially impacts other groundwater users including our client. Our client suggests therefore that in much the same way as an EMPr is amended based on varying contingencies, the monitoring programme be treated on a similar footing. It therefore suggests to both DEA&DP and DWS to impose suitable conditions of approval for any environmental authorisation and water use licence to encompass such a monitoring programme.	Response from GEOSS: This concern is duly noted, GEOSS will amend the report to state once final site development approvals are received and the intricate details of the services are made available, a more detailed, standalone monitoring programme report will need to be developed prior to the construction and development phase.
		35.5. On page 80 of the amended GEOSS assessment, the following is stated in the conclusion: "The development may proceed; however, only on the basis that the construction and operation of the facility employs relevant mitigation measures so as not to impact on groundwater and associated groundwater users. It is therefore recommended that the development design include a groundwater monitoring plan". Purely from a	Response from GEOSS: Comment noted.

		groundwater perspective, this conclusion would be supported by our client subject to being afforded a reasonable opportunity to comment on the final groundwater monitoring plan and being able to serve on the envisaged monitoring committee. However, this concession must not be interpreted as being supportive for the development of the expanded airport overall, in respect of which our client remains a strong objector against such development for all the reasons set out in previous comments and herein.	
		35.6. We have also considered the amended GEOSS assessment annexed to the WULA report (GEOSS-WULA) and make the following observations:	-
		35.6.1. The GEOSS-WULA report contains the same proposed groundwater monitoring plan as contained in chapter 12 of the amended GEOSS assessment referred to above in chapter 11 thereof. Our comments set out in paragraphs 35.2 to 35.4 above are therefore applicable to chapter 11 of this report as well.	Response from GEOSS: This concern is duly noted, GEOSS will amend the report to state once final site development approvals are received and the intricate details of the services are made available, a more detailed, standalone monitoring programme report will need to be developed prior to the construction and development phase. EAP response: this amendment has been incorporated into the EIAR and EMPr.
		35.6.2. On page 39 of the GEOSS-WULA report, the author states that during the testing of CWA's boreholes 001 and 002, a neighbouring borehole HBH6 was also monitored. HBH6 is one of our client's boreholes which we have previously advised had dried up. This is confirmed in the hydrocensus on page 27 of the GEOSS-WULA report where it is recorded that this borehole has dried up. Our client therefore questions the veracity of what is stated on page 39 in regard to the HBH6 borehole.	Response from GEOSS: When CWA_BH001 and CWA_BH002 were tested in 2022, HBH6 did not yet dried up, the current status of HBH6 was only confirmed in 2024 by your Client, and therefore it was updated in the Hydrocensus Table on page 27. In the report, the date when the boreholes were tested can be seen on page 35. GEOSS will, however, rephrase the statement and repeat the testing date.
		35.6.3. On page 65 of the GEOSS-WULA report, the report recommends amongst the mitigation measures that "no compounds containing ... PFCs are to be used on site". We have previously mentioned that	Responses from GEOSS: Comment Noted

		PFCs should not be used in firefighting on the site as PFCs have internationally been outlawed (see paragraph 12.8 of our letter dated 13 January 2025) and this mitigation measure is fully supported by our client.	
		36. Waste Management Plan	-
		36.1. On page 13 of the Waste Management Plan (WMP) (Annexure 8 to the Amended Draft EMPr), reference is made to the storage of the various waste streams. It is not clear other than from the layout plans where the storage area will be located. Because of the ability of waste to attract wild birds, rodents and flies, our client requires to know whether the waste streams will be stored in closed structures or whether this will be in the open.	EAP response: As indicated in the WMP (Figure 6), the 'Services Precinct' within the Cape Winelands Airport development is where waste will be managed and collected. The Waste Management Facility is indicated as C05 in Figure 6 which is centrally located within the Services Precinct of the Airport. The Services Precinct (as per the SDP) is located to the west of the Airside Precinct (Runways) which is west of the Agricultural Precinct. All Waste Streams will in closed containers/ structures for the exact purposes of preventing Birds and Pests being attracted to the site. A stringent Wildlife Hazard Management Plan (including Birds) will be implemented on site. Best practice in this case stipulates that <i>"All waste skips should be covered at all time and waste storage facilities should all be under roofed and closed off"</i>. Furthermore, stringent Pest Control measures will become part of the standard daily procedures of the Airport. The WMP states that <i>"A Certified Pest Control Company must be appointed at the onset of the project to ensure that preventative measures are put in place and monitored to ensure the effectiveness of the Pest Control Schedule"</i>.
		36.2. On page 15 of the WMP, it is stated that the WMP is an evolving document and will be dependent on the final designs for the project. One imagines that the WMP will therefore develop along with the Draft EMPr and our client's concern in this regard relates to what provisions for public participation on the evolving WMP will be provided for. Our client requests that DEA&DP impose a suitable condition if environmental authorisation is to be granted providing for adequate public participation on all further iterations of the WMP.	EAP response: Amendments to the EMPr must be done in accordance with Regulations 35 to 37 of the EIA Regulations, 2014 (as amended). Regulations 35 to 37 therefore stipulate the procedures to follow regarding any amendments to the EMPr. These Regulations stipulate the necessary public consultation process required." The WMP in its current format is addressing the industry requirements for waste management and the potential waste impacts identified and raised by I&AP's in the EIA. Therefore, the evolution of the WMP will result in a "fine-tuned" plan ensuring that the objectives set is executed fully resulting in more effective waste management. The changes will not result in new impacts that is material to I&AP's, ironically any change will only enhance the waste

			management performance. Its common practice that if Norms & Standards apply like in this case the Waste EMP is not subjected to Public Participation, the competent authority who is qualified to approve such a plan is in the best position to ensure the plan adheres to the standards in the interest of the environment and the public.
		36.3. It is clear from page 16 of the WMP that the waste storage area will be located on the western side of the runways and will thus be near to our client's complex. As such, the entire waste treatment on the CWA site remains a concern for our client and the possible negative impact that it may have on our client's biosecurity.	EAP response: please refer response above.
		36.4. On page 18 of the WMP, the concept of a mobile waste yard is mentioned and referred to in Figure 4. It is not clear what is envisaged by this mobile waste yard and our client seeks further clarity on this.	EAP response: The mobile waste yard would be the temporary Waste Facility during the Construction Phase of the Services Precinct i.e. Waste Facility. At any time of construction there will always be a mobile skip or more at the construction site. The WMP states: "All waste streams during construction will be separated at source from where it will go to a mobile waste yard, <u>location determined by logistics i.e. where works are taking place</u> . When the services precinct (red outlined area also refer to Figure 6 below) is complete all waste streams will go to the waste management facility from where it will be collected and removed from site."
		37. Land Use Management Processes On page 164 through to page 165 of the Amended Draft EIA Report, reference is made to the need to comply with the Municipal Land Use Planning By-Law to obtain the necessary authorisations for the site-specific circumstances required to accommodate the expanded CWA. It is stated that the statutory process prescribed in section 9 of the By-Law "is being followed". Inasmuch as our client has not received any notification of such process, it requests details thereof and in particular details of when such process was initiated, why no	Response from town planner: While there are no statutory prescriptions for the order in which environmental and land use applications must be submitted, it is generally considered best practice to include the Final Environmental Impact Report (prepared under NEMA) when submitting land use applications in terms of the MPBL. The MPBL application referred to here has not been submitted yet. It is expected that this will be done shortly after the submission of the FEIR. The

		notification was sent to them as a registered I&AP and details of any publication in respect thereof in the media.	City of Cape Town, as the competent authority for municipal planning, will notify the immediate neighbours such as this I&AP in addition to others and notices will also be published in the press and displayed on site.
		38. Sewage Management and Treatment In paragraph 6.9 commencing on page 231 of the Amended Draft EIA Report, the various options for sewage management and treatment are set out. We have already noted in previous comments our client's concerns and objection to an on-site treatment plant and its preference for sewage to be pumped to the Fisantekraal WWTW instead. In regard to what is set out regarding the options and CWA's preferred option, our client comments as follows:	-
		38.1. Please explain in more detail the concept of a "package plant". Will this be housed in a closed environment or not?	Response from Zutari: A "package plant" refers to a compact, pre-engineered, and modular wastewater treatment system. These systems are typically self-contained and factory-assembled. The wastewater treatment solution may be a package treatment plant, or it may be a conventional treatment works albeit at a smaller scale. The final configuration will be determined in the detail design phase. Irrespective of the type of plant, the plant design will take steps to reduce and control odour, noise, and exposure to the elements and may be equipped with a covering where there are external water surfaces.
		38.2. Reference is made on page 234 to "an emergency overflow pond". Will this pond be covered regard being had to the stated intention throughout the Amended Draft EIA Report to there not being any open bodies of water other than pond 2 (the existing open quarry) which will be used for stormwater?	Response from Zutari: Since this pond is an emergency overflow pond for sewage water, the intension is that the water in this pond is evacuated and dealt with in a very short space of time. Thus, covering this pond in response to bird attraction is not required. The timeframes that the water will remain in the pond will depend on the nature and type of outage and can range from a few hours to a few days.

		38.3. Our client's concern in regard to an open emergency overflow pond is that such a facility will attract wild birds and flies, which are known vectors of bacteria which impact negatively on our client's biosecurity and thus on its operations.	Response from Zutari: As stated above.
		39. Stormwater Management 39.1. The details provided on pages 244 and 245 which have been added to the Amended Draft EIA Report have been noted by our client. The concerns previously raised by our client appear to have been accepted by CWA's avian specialist and has resulted in limiting on-site stormwater storage to pond 2 only and ensuring that the exposed water body is adequately covered. All the other stormwater detention ponds are intended to be dry ponds where stormwater will be retained for no more than 24 hours. These measures do provide our client with a measure of comfort providing the measures set out are implemented.	Response from Zutari: Typically, the approximate water retention time for the dry attenuation ponds is between 24 – 36 hours. Please see attached correspondences that contain the hydrographs for reference as well as confirmation from the Avifauna specialist that bird strike for these retention periods is not a concern but will be closely monitored.
		40. Exposure to Fog Commencing on page 382 of the Amended Draft EIA Report, the location alternatives are set out. In paragraph (c) on page 384, meteorological conditions are referred to and reference is made to the fact that the risk of fog plays a crucial role in site selection. It is stated that the proposed CWA site sits on an elevated ridge at approximately 399 ft above sea level which reduces exposure to fog, which frequently disrupts operations at lower-altitude sites in Cape Town. Our client's representatives have informed us that fog plays a major role in the area and senior management have reported that on the main arterial roads being the R312 and the R304 fog disrupts traffic flow substantially and at times trebles the travelling time to its farms in the area and to its processing plant which is situated nearby the CWA site and is accessed from the R304. They also report that the junction between the servitude road to its processing plant at Hocroft and the R304 sees regular collisions which are exacerbated during fog events. While we note that according to the Transport Impact Assessment the four-way stop between the R312 and R304 are to be upgraded with dedicated turning lanes from the R304 onto the R312, the fact that fog occurs will still make the four-way stop an accident prone intersection particularly when visibility is substantially reduced during fog events.	Response from ITS: It is recommended in the TIA report to signalise this intersection in future and to provide dedicated turning lanes. CWA response: We acknowledge the concerns raised regarding fog and road safety. However, the meteorological reference in the EIA is based on a detailed 4-year study by the South African Weather Service, which specifically modelled fog and visibility at both CTIA and the proposed CWA site. This scientific assessment, using a high-resolution forecasting model, confirmed important differences in fog behaviour and clearance times between the sites, influenced by orographic and localised climatic factors. The CWA site's slightly elevated topography and its position inland contribute to a different fog dynamic compared to CTIA, particularly in terms of earlier fog dissipation in certain months. The reference to elevation in the EIA is not

		Consideration should therefore be given to converting the four-way stop to a traffic light controlled intersection to minimize the risk of vehicular accidents.	intended to suggest fog is absent, but rather to reflect these nuanced differences in operational impact. On the matter of road safety, the Transport Impact Assessment has already identified upgrades at the R304–R312 intersection. While the need for traffic signalisation has not been warranted at this stage, we remain open to further engagement with road authorities should additional safety interventions be justified through formal assessment.
	41. Zoning	On page 386 of the Amended Draft EIA Report, reference is made to the site’s existing appropriate zoning for the existing Fisantekraal airfield. However, no mention is made of the need to rezone agricultural land for the expanded airport and no mention is made of whether the consent of the Minister of Agriculture for such rezoning has been obtained or applied for. Our client accordingly requests details in regard to these aspects which are conspicuous by their absence in the amended report.	Response from town planner: The EAP’s summary on page 386 of the Amended Draft EIA Report should be read together with Appendix 36, Section 6.1.2 which clearly describes what will be rezoned. The proposal is to retain the existing “<i>Agriculture (AG)</i>” zoning on the areas east of the runway safety zone. A split zoning is proposed for the two large farm portions, Portion 7 of Farm 942 Kliprug (257 ha) and the Remainder of Farm 474 Joostenbergs Kloof (398 ha). Only the runway safety area and the area west of the runway is proposed to be rezoned to Transport Zone 1 (TR1). This explanation is supplemented in Fig. 29 of Appendix 36 with a map indicating the existing and proposed zoning for CWA. This I&AP is mistakenly of the view that the consent of the Minister of Agriculture for a rezoning is required. Municipal Planning is a local government competency in terms of the Constitution and several ConCourt rulings in this regard exist, as well judgments as to what municipal planning entails. The mistaken view of this I&AP may relate to the Subdivision of Agricultural Land Act No. 70 of 1970 (SALA). No subdivision application is being made and hence SALA finds no applicability. The City will as per its normal procedures request comments on the MPBL applications from both the National and Provincial Departments of Agriculture EAP response: The amended draft EIAR states on page 84 <i>According to H&A Planning the proposed development area requires an elongated shape for the runway safety area, and the landside development is located to the West of the proposed runway. These areas need to be rezoned to “Transport Zone 1 with consent to permit an airport”. The areas East of the proposed airside</i>

			currently zoned as agriculture will remain as agriculture zoning with associated farming activities. The requirement for rezoning is reiterated on page 85, 161.
		42. Noise Impacts We have dealt in previous comments and above in much detail with the potential noise impacts on our client's breeder stock. We do not intend repeating these comments again. However, on page 387 of the Amended Draft EIA Report, comparisons are drawn between noise impacts in respect of the major runway realignment at Cape Town International Airport (CTIA) and the noise impacts for the CWA site. It is stated that "the CWA site benefits from minimal residential encroachment and fewer noise sensitive receptors". This statement not only ignores our client's position (with a number of its employees residing on the complex) but also the position of the development of Greenville Garden Cities and the Bella Riva estate, both of which will be in close proximity to the expanded CWA project. This would make the position of the expanded CWA similar to that of CTIA and may well require appropriate noise mitigation measures.	Specialist response: The statement that "the CWA site benefits from minimal residential encroachment and fewer noise-sensitive receptors" is made in the context of relative scale, operational intensity, and surrounding land use patterns: • CTIA is an international hub, with 677 aircraft operations daily, under full utilisation. It is surrounded by dense urban development, including high-exposure zones that fall well within high LRdn contours (≥ 65 dB(A)). • Of these, 629 operations are performed by large aircraft, with only 48 involving light aircraft. • In contrast, CWA's full utilisation scenario (208 operations/day) consists of a more balanced fleet, with 114 large aircraft and 94 light aircraft operations. • CWA's new runway design and surrounding land use allow for greater flexibility in routing and dispersal of noise away from densely populated areas. • The receptor density around CWA remains lower and the layout enables more effective implementation of mitigation measures such as flight path design, altitude management, and operational scheduling. The assertion that the NIA ignores nearby developments is incorrect. The assessment: • Explicitly identified and modelled noise-sensitive receptors, including the adjacent breeder complex, Greenville, and Bella Riva. • Predicted LRdn, N70, and N60 levels for these areas, with most falling within acceptable exposure ranges, particularly under night-time and average conditions.

			Recommended mitigation measures and permanent noise monitoring at or near these sites to ensure ongoing oversight. The residential accommodation for workers at the adjacent breeder complex has been explicitly acknowledged and assessed in the Noise Impact Assessment (NIA). The complex was identified as a sensitive noise receptor, and predicted noise levels were modelled for both Scenario 1 (Existing runways at full capacity) and Scenario 3 (New Runway at full capacity). In both scenarios, the expected noise exposure was 53.5 dB(A) LRdn, which falls within the acceptable range for residential environments as per SANS 10103 and international guidelines.
		43. Noise Mitigation Plan Commencing on page 498 and ending on page 500 of the Amended Draft EIA Report, mitigation measures in respect of the operational phase of the airport was set out. On page 500, the following is stated: “A Noise Mitigation and Management Plan (NMMP), with measurable goals, which will effectively prevent an intricately manage noise emissions from the Operational Phase of the CWA must be compiled prior to the implementation of the proposed Operational Phase. The NMMP is to be included in Annexure 19.” It seems that the reference to Annexure 19 is a reference to an intended Annexure 19 to the Amended Draft EMPr. Annexure 19 is not available for public comment at this stage of the EIA process. Clearly, this is a plan that is still to be prepared and therefore our client questions at what stage such plan will be made available for public comment as the noise management from the operational phase is of great concern to our client and the impacts thereof on its breeder stock at its Fisantekop complex as set out in our previous comments submitted on our client’s behalf and in our above comments.	EAP response: A Noise Mitigation and Management Plan (NMMP) will be compiled prior to the implementation of the proposed Operational Phase and will become Annexure 19 in the EMPr. 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. The EMPr states: <i>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. Once 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. For this reason, the compilation of a Noise Mitigation and Management Plan (NMMP) will take place post authorisation.</i>

			Specialist response: At this stage of the EIA process, the NMMP reflects principles, preliminary mitigation objectives, and commitments drawn directly from the specialist Noise Impact Assessment (NIA). This is standard within the regulatory framework. Under the EIA Regulations, 2014 (as amended), and consistent with typical best practice, the EMPr submitted at the environmental authorisation stage includes the initial NMMP framework, specifying commitments, monitoring, and reporting obligations. The detailed operational-phase NMMP, with finalised thresholds, monitoring sites, and corrective protocols, is refined and formalised prior to commencement of the operational phase, as part of the implementation instruments flowing from the conditions of the Environmental Authorisation (EA). Regarding the breeder stock, the NMMP will incorporate ongoing noise monitoring with adaptive thresholds to ensure compliance with the predicted exposure levels from the NIA. It will also include clear responsibilities and protocols for addressing exceedances, including adjustments to flight procedures or other operational measures. This framework is explicitly designed to protect sensitive human and animal receptors, with management actions calibrated to real-world monitoring results.
		44. Noise and Vibrations	
		44.1. On pages 676 and 677 of the Amended Draft EIA Report, the issue of noise and vibrations are dealt with in the context of the operational phase and the impact thereof on our client's breeder complex. In this regard, we refer to what we have stated in previous comments and above and do not intend repeating our comments here. Suffice to say, the impacts listed on these pages fail to adequately address our client's concerns and our client	EAP response: Refer response above provided by Poultry specialist Dr Petty. Noise specialist response:

		therefore continues to object to the proposed project due to the negative impacts which noise and vibrations will have on its breeder stock.	As noted in the NIA, the breeder complex has been identified and modelled as a sensitive receptor. Predicted day-night average noise levels (LRdn) at this location are 53.5 dB(A) under both Scenario 1 (Current Runways at full utilisation) and Scenario 3 (New runway at full utilisation). This level falls within the acceptable range for residential and agricultural uses, as defined by SANS 10103, and is below thresholds generally associated with harmful effects on human or animal health. Aircraft operations, particularly for take-offs and landings at a regional airport scale, are not typically associated with significant ground-borne vibrations beyond the immediate vicinity of the runway and taxiways. Based on the distance between the breeder complex and the proposed runway alignment, no material vibration impacts are expected. Recognising the sensitive nature of the adjacent operation, the NIA recommends: • Installation of three permanent noise monitoring stations around the airport. • Post-construction validation of predicted noise levels • Adaptive mitigation, including operational adjustments or passive sound insulation, if exceedances are detected.
		44.2. On page 680 of the of the Amended Draft EIA Report, the following statement is made in regard to noise impacts during the operational phase on our client's complex: "Ensure good management when birds are introduced onto the farm and are being habituated to the unaccustomed noise". Firstly, we refer to our remarks stated above concerning this aspect of habituation. Secondly, to now impose upon our client the obligation suggested when no details either of a specialist nature or otherwise are provided, is simply totally unacceptable to our client.	EAP response: Please refer to the detail response provided by the poultry specialist in point 34.3 above.
		45. Pest Control On page 678 of the Amended Draft EIA Report, it is recorded that rodents play a key role in the transfer of salmonella and that more than 100 pathogens associated with the house fly may cause disease in humans and animals and	EAP response: The proposed mitigation measures are noted.

		various diseases are listed. It is stated that in regard to rodents “attention should be given to the waste handling at the facility” (in respect of which we refer to our comments in paragraph 36 above) and in regard to flies, it is stated that “effective fly control programmes in both the industrial area and the poultry farm are essential”. The introduction of the industrial components of the land side facilities will attract rodents and flies, aspects which are absent currently. No indication is given of the measures to be implemented by way of effective fly control programmes as suggested. The situation is furthermore exacerbated by the envisaged composting facility. Our understanding is that the composting will be conducted in open windrows and will contain organic matter. We have dealt in the past with the problems which composting in open windrows present to our client and we procured a report from an animal health expert, Prof. Daniel Barry, in relation to an organic recycling plant adjacent to certain of our client’s broiler complexes in 2022. A copy of that report is annexed hereto marked “A” and while we readily concede that the composting envisaged on the CWA site is not the same as what was being considered by Prof. Barry in relation to the organic recycling processing and composting facility, his comments regarding correct fly management are certainly of application to what is envisaged on the CWA site. In this regard, we refer to section C commencing on page 5 of his report as well as to the mitigation measures listed in paragraphs 5 and 6 on page 7 of his report. Our client recommends similar mitigation measures in order to effectively control flies at the envisaged composting site and would suggest to the competent authority to impose the mitigation measures reflected in paragraphs 5 and 6 on page 7 of Prof. Barry’s report being imposed as conditions of any environmental authorisation that may be granted	A Certified Pest Control Company will be appointed at the onset of the project. The WMP stipulates that <i>“Best practice pest control measures will be implemented, and a Certified Pest Control Company will be appointed on the onset of the Construction and Operational Phases to ensure that preventative measures are put in place and monitored to ensure the effectiveness of the Pest Control Schedule.”</i>
	Comments on the Amended Draft EMP	-	-
	46. In regard to the Amended Draft EMP, we comment as follows:	-	-
	46.1. On page 29 thereof, it is recorded that the main noise sources at MPO2 (the measuring point used by the noise specialist on the border of our client’s complex) are vehicular traffic, poultry sounds and the current aircraft operations on the existing Fisantekraal airport and nature sounds. These noises in accordance with the measurements during day- and	EAP response: this concern is noted and has been addressed in the Poultry specialist report and by subsequent further explanations provided in C&R reports.	

		night- time respectively on our client's boundary are such that they do not cause panic or stress on our client's breeder stock. On the other hand, the anticipated noise levels with large aircraft taking off and landing and the increased vehicular movement onto the enlarged airport precinct which will be immediately adjacent to our client's complex, are aspects of concern to our client as set out in our previous comments and in these comments.	Noise specialist response: As noted in the NIA, the breeder complex has been identified and modelled as a sensitive receptor. Predicted day-night average noise levels (LRdn) at this location are 53.5 dB(A) under both Scenario 1 (Current Runways at full utilisation) and Scenario 3 (New runway at full utilisation). This level falls within the acceptable range for residential and agricultural uses, as defined by SANS 10103, and is below thresholds generally associated with harmful effects on human or animal health. Aircraft operations, particularly for take-offs and landings at a regional airport scale, are not typically associated with significant ground-borne vibrations beyond the immediate vicinity of the runway and taxiways. Based on the distance between the breeder complex and the proposed runway alignment, no material vibration impacts are expected. Recognising the sensitive nature of the adjacent operation, the NIA recommends: • Installation of three permanent noise monitoring stations around the airport. • Post-construction validation of predicted noise levels • Adaptive mitigation, including operational adjustments or passive sound insulation, if exceedances are detected.
		46.2. On page 149 thereof, in respect of poultry mitigation, it is suggested that CWA should avoid scheduling flights after 11 pm. While this is all well and good, it doesn't deal with the increased noise levels that will be caused by flights landing and taking off before 11 pm. In addition, the same mitigation measure as quoted by us in sub-paragraph 44.2 above is repeated without giving any details of (a) on whom this obligation lies and (b) precisely what the appropriate measures should be.	EAP response: Please refer to the detail response provided by the poultry specialist in point 34.3 above.
		46.3. On page 164 thereof, it is suggested that a lighting audit must be conducted by the ECO or a suitably qualified subcontractor on behalf of the ECO at the end of each construction phase to ensure that all lighting	EAP response: Noted

		and related mitigation measures are adhered to and successfully implemented. Needless to say, our client would support this measure.	
		46.4. On page 169 thereof, various methods to mitigate the negative impacts of night lighting are referred to. We have already dealt with these in previous comments and hereinabove but the provision listed in bold that the “6m perimeter lighting proposed to encircle the development periphery is not supported” is a measure that is, for obvious reasons, supported by our client. However, on page 170 thereof, it is stated as follows: “It may not be possible for parts of the proposed development to adhere to the above mitigation measures in every part of the development, given the specialized lighting that would be necessary at an airport.” It is then stated that this risk can be managed through the submission of the detailed lighting proposal at SDP stage and that this will allow the competent authority and/or the visual specialist and/or the electrical engineer preparing the Lighting Report to be provided with sufficient information during the future approvals process so that visual impacts associated with the direct and indirect visibility of lighting can be avoided, reduced or mitigated wherever possible when this detailed information is available. In this regard, we not only refer to what we have already stated in previous comments and above but reiterate that the suggestion does not cater for a public participation and thus an opportunity for our client to ensure that its concerns are adequately catered for. Accordingly, our client requests DEA&DP, if an environmental authorisation is to be granted, to impose as a condition of approval the necessity to conduct a public participation on the Lighting Report so that its concerns may be put forward and that thereafter such Lighting Report be approved by the competent authority concerned taking into account our client’s concerns and imposing appropriate conditions to address them.	Response from visual specialist: Refer to the response provided to point 18 and 19 above. EAP response: The requirement to conduct public participation on the Lighting Report is not supported. The requirement to consult adjacent and affected landowners during the formulation of this plan is proposed.
		46.5. On the bottom of page 184 to the top of page 185 thereof in dealing with lighting and its impact on our client’s complex, it is suggested that the road be designed in such a way that light does not shine into our client’s chicken houses, that signs be erected requiring car lights to be dipped on	CWA response: A barrier will be constructed along the common boundary between CWA and County Fair, to the west of the main access road. While the final form of the barrier will be determined in consultation with County Fair and subject to the

		the affected section of road, that barriers preventing the light from shining into our chicken houses be erected, that the sources of light be hooded and that the erection of a facility wall which will block some of the light be built. What is not stated is whether the barriers and the facility wall referred to will be an obligation on the developer (which we suggest is clearly the intention) or something which is imposed upon our client which would be unacceptable.	City of Cape Town's guidelines and regulatory requirements, a landscaped berm is anticipated to be the most effective solution. CWA will be responsible for covering all associated costs. EAP response: The type and extent of barrier to be implemented should be subjected to consultation between the parties, it must align with regulatory guidelines and requirements, and it need to achieve the mitigation requirements for dust, noise and lighting impacts.
		46.6. On page 197 thereof, it is stated that "no outdoor cooking of any form or open fires are allowed" in respect of the contractors camps. This insertion is probably as a direct result of our previous comments in this regard but we point out that this provision does not align with the CRR in respect of which we refer to our comments in paragraph 27 above.	EAP response: Noted. The CRR was incorrect as indicated in response to Point 27. The EMPr states that <i>"No outdoor cooking of any form or open fires are allowed."</i>
		46.7. Commencing on page 200 thereof, the groundwater monitoring plan is referred to. We note that in table 12 the CWA _ BH003 is not included. This should be included as well as our comments in paragraph 36.3 above regarding additional monitoring boreholes on adjacent properties.	EAP response: The table in the Groundwater Impact Assessment report (Appendix 3 to the amended draft EIAR) does contain CWA _ BH003. The EMPr will be updated with the correct table. Other comments were addressed above.
		46.8. On page 213 thereof, the issue of dust control is dealt with and a paragraph referring to the National Dust Control Regulations has been added. In the first bullet when describing the "good practice" dust suppression measures that must be implemented, the application of chemical suppression is referred to. For reasons set out by us in paragraph 20 above, our client requires the addition of chemical suppression to all water that is sprayed on site to control dust outfall.	Specialist response: As indicated in comment 20, chemical suppression using emulsions is not excluded, but rather incorporated as a secondary mitigation measure, to be implemented if warranted by the results of ongoing dust monitoring.
		46.9. Commencing on page 235 thereof, a tabulated environmental management plan is set out. on page 242, the following sentence has been inserted:	EAP response: The development of the Groundwater Management Plan has been responded to by GEOSS. No public participation on the proposed plan is required – when compiling the plan, the specialist will consult with affected parties and adjacent landowners as appropriate.

		“A comprehensive Groundwater Management Plan must be compiled, implemented and included as Annexure 17 prior to the proposed operational activities commencing.” To this should be added the ability for registered I&APs to comment thereon and furthermore because groundwater will be the only water source in the short term, the Groundwater Monitoring Plan should be compiled, implemented and included as Annexure 17 for both the construction and operational activities.	
		46.10. Finally, on page 267 thereof, in dealing with poultry management, the suggestion to avoid scheduling flights after 11 pm has been introduced and we refer in this regard to what we have set out in paragraph 46.2 above. All the rest of the measures listed in Goal 9 are noted and in respect of each of them, we refer to our previous comments as well as our comments set out herein.	EAP response: this has been responded to.
		Conclusion 47. Based on all our previous comments as well as what is set out herein, our client continues to object to the proposed CWA development as it impacts negatively on our client’s breeder complex. Kindly confirm receipt hereof and provide us with an extract from the next iteration of your Comments and Response Report as we understand that you will be submitting the Amended Draft EIAR and all appendices to DEA&DP and DWS for their consideration once the current public participation process has been concluded. Depending on the response to our above set out comments, we may be constrained to address a communication to DEA&DP and DWS on our client’s behalf in order to respond thereto.	EAP response: The objection to the proposed project is noted.
		Annexure A: Environmental Impact Report on Poultry Heath as requested by County Fair Chickens, Karnemelksvlei, District of Paarl. <i>[Please note: This Annexure has been attached to the current C&R Report as Appendix D (C410)]</i>	-
411	Karla Burger - Elcoprop	Email dated 13 May 2025: 1. Please see attached the following for your perusal:	Email response provided 13 May 2025: 1. Thank you for the comments and attachments received

		• Comments Letter (with Annexure A & Annexure B) • Power of Attorney • Resolution Kindly acknowledge that this has been received. <i>[Please Note: Annexure A and Annexure B to the comments letter, the PoA and the Resolution attached to this email are included in Appendix E (C411) to this C&R Report]</i>	
		Letter received via email dated 13 May 2025: COMMENT ON AMENDED 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.	-
		1. 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 • Formal Comment submitted 13 December 2024 on In-Process	EAP response: Noted
		2. 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	Response from CWA: As CWA we have noted the new flexible development framework allowing for suitable integration with the airport development. We are both supportive

		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 new 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, subject to latter amendments as per the amended access along Lucullus Avenue to accommodate the airport. The pre-scoping process for Bella Riva closed on 25 April 2025, upon which the attached comment was received from Cape Winelands Airport (Annexure A) (<i>Appendix E (C411) of this C&R Report</i>). We have also noted their response to our previous comments as part of the latest distribution of documents (Annexure B) (<i>Appendix E (C411) of this C&R Report</i>). The following sections will highlight our response to the detailed reports that formed part of the in-process EIA circulation as well as a response to their comments on the Bella Riva pre-scoping process.	and appreciative of this revised development framework which is aimed at ensuring effective integration of the two developments. .
		3. Positive Comments: Our client welcomes the positive comments received from the CWA team. We remain open to collaborating with the CWA 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	Response from CWA: As CWA we view the proposed revised Bella Riva development framework as a collaborative approach to ensure integration with the airport. We remain committed and available to work with the Bella Riva team to ensure that this is achieved. The importance of the feasibility of the Bella Riva development is understood.

	must also be feasible in order to deliver this infrastructure and community amenities.	
	4. Noise Impact Assessment: No amendments have been made to the Noise Impact Study. 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. Fig. 1: Noise Rating Level Contours; Fig. 2: N70 Contours The study included two contour sets, i.e. the noise rating level contours and the N70 contours. From Google Gemini the following is understood in terms of the difference between these two studies: “In essence, while both are tools to visualize noise impact on a map, general noise contours describe the average intensity of sound, while N70 contours describe the frequency of relatively loud aircraft noise occurrences. N70 contours offer a more event-based perspective that can be more intuitive for understanding the day to-day experience of living near an airport”.	Specialist response: The 45–55 dB(A) LRdn range represents a low to moderate level of environmental noise exposure, according to SANS 10103 and international guidelines. Within this range: • Residential activities are generally not significantly impacted, particularly if indoor environments benefit from standard building attenuation (typically 10 dB(A)). • Noise levels do not typically warrant direct mitigation measures, such as land-use restrictions or mandatory building upgrades. For context, the World Health Organization (WHO) recommends that outdoor noise at night not exceed 40 dB(A) for optimal sleep, but also recognises that up to 55 dB(A) is considered moderate exposure in urbanising areas. In the case of Bella Riva, most noise exposure remains well below the 60 dB(A) threshold, beyond which annoyance or health risks become more prominent. The noise modelling shows that the residential areas of Bella Riva are located within the 45–55 dB(A) contours and are not exposed to high or frequent single-event noise exceedances (e.g., N70 or N60 events). As such: • There are no expected restrictions or limitations on residential use due to noise exposure within these contours. • No mandatory building mitigation (e.g. soundproofing) is required under the current conditions. However, developers and planners may, at their discretion, consider voluntary design enhancements (e.g. acoustic glazing, optimal orientation of buildings) as a good-practice precaution, especially for bedrooms or sensitive spaces.

We received the digital files for the noise rating level contours from the noise consultant to accurately determine the effect on Bella Riva. Overlaying these onto the Bella Riva framework revealed the following. An estimated 5,3919ha within Pockets 11 and 12 of Bella Riva will be located within the 55dBa-60dBa noise contours. This is above the prescribed regulations for a residential area (55dBa). CWA needs to clarify what specific noise mitigation measures are required for development within this 55-60dB zone. Furthermore, the noise contour data currently available appears incomplete — there is little to no information provided on the 50–55 dB and 45–50 dB zones. Bella Riva requires clarity on what implications these lower contours may have for residential component of the development, including any mitigation requirements or limitations.

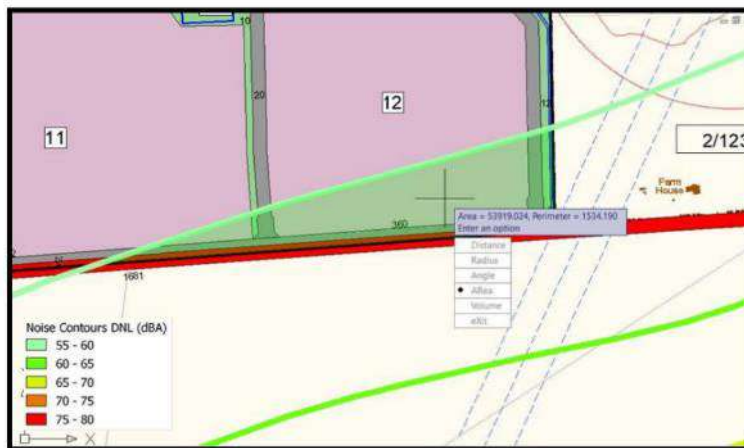


Fig. 3: Portion of Bella Riva above Prescribed Noise Rating Regulations

As per the above figure (2), the N70 contours shows an exceedingly higher impact than the noise rating level contours themselves. As shown in Fig. 4, Pockets 11, 12 and 13, are heavily impacted by 30–40 and 20–30 daily 70dB events. This will significantly affect the saleability and value of these pockets. 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. In our current Basket of Rights we planned to position the higher-end residential units near the airport on the highest-elevation

Regarding the estimated 5.3919 hectares, which fall within the 55–60 dB(A) LRdn contour, the concern is noted.

The 55 dB(A) LRdn threshold according to SANS 10103:2008 provides guidance on acceptable environmental noise levels in different land-use contexts. While 55 dB(A) is considered the upper recommended level for “urban districts with mixed residential and commercial use”, the 55–60 dB(A) range is not an exclusionary threshold for residential development.

Instead, it indicates an area where:

- Moderate annoyance may occur, particularly during extended outdoor exposure.
- Careful land-use planning and building design should be considered to maintain indoor acoustic comfort and limit health or quality-of-life impacts.

Regarding the portion of the development within the 55–60 dB(A) noise contour, the following best-practice mitigation measures could be recommended—not as rigid requirements, but as reasonable design responses in line with South African and international norms:

- Architectural Design Considerations:
 - o Orientation of noise-sensitive rooms (e.g., bedrooms) away from the primary noise source.
 - o Use of noise-reducing windows and improved glazing.
 - o Enhanced wall insulation and sealing to reduce airborne sound transmission.
 - o Incorporation of mechanical ventilation systems to allow windows to remain closed during peak noise periods.
- Site Planning:
 - o Buffer zones or non-sensitive land uses (e.g., green space, parking, or commercial components) can be positioned closer to the airport-facing boundary

land, which made them the most desirable. However, to accommodate CWA, we are proposing a new development framework showing this prime land as mixed use areas. This enables flexibility for industrial or warehouse developments if the airport upgrade proceeds, or for 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. Even the new flexible development framework allows for a certain amount of residential rights. It is therefore still critical for CWA to indicate what noise mitigation is required in the 20-30 and 30-40 daily 70dB event areas for residential or other uses.

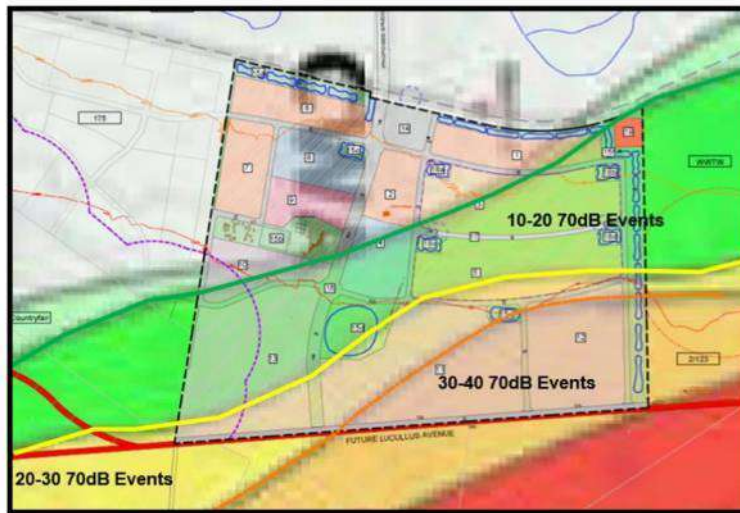


Fig. 4: Portion of Bella Riva above 30 events per day

Pockets 1, 3, 4, 5, 10, 11 and 13 are all impacted to an extent by the 10-20 N70 contours. Comments from CWA state that the 10-20 N70 events are not considered significant. It is however critical for us to understand the implications thereof, including any mitigation requirements or limitations. 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.

o Use of landscaping and structural barriers to reduce perceived noise and improve privacy.

In addition, the proposed noise monitoring strategy ensures that any future changes in operational noise, due to flight patterns or volume, can be detected early and addressed proactively. This includes:

- Installation of a permanent noise monitoring station near or within the Bella Riva estate.
- Post-construction validation of modelled noise levels.
- Adaptive mitigation if unexpected exceedances are recorded.

In addition to the average noise levels (e.g. LRdn), single-event noise metrics, such as the N70 (number of events that the L_{Amax} exceeds 70 dB(A)) are used internationally to assess the potential impact of aircraft noise on residential amenity.

In South Africa, N70 is not a regulated metric. The South African regulatory framework primarily focuses on long-term average noise exposure, using metrics such as the LRdn (Day-Night Average Sound Level). This metric is used in the Noise Impact Assessment (NIA) to evaluate general environmental noise exposure.

According to guidelines adopted in Australia (Airservices Australia and the Australian Department of Infrastructure), the following thresholds are commonly referenced for residential areas:

- Acceptable exposure: 0–20 N70 events per day.
- Moderate concern: 21–50 N70 events per day
- High concern: More than 50 N70 events per day

			In the case of Bella Riva, the Noise Impact Assessment shows that the number of N70 events remains below the high concern threshold, even under the full utilisation scenario. This further supports the conclusion that noise impacts on this specific residential use will be moderate to low, with no need for exceptional mitigation beyond standard architectural and planning responses. In addition, the night-time N70, will not reach the Bella Riva development, as it is contained within the airport site. It is also important to note that these number of events will only be reached by the year that the airport will reach capacity.
		5. Transport & Access: 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. A meeting was held on 12 December 2024 regarding amending the Bella Riva access to Lucullus Avenue to better align with the access of the CWA. The amended plan was sent to the CWA team on 22 April 2025, which still needs to be incorporated into the airport SDP. As per below, the latest plans proposed is not in alignment with this new proposed access for Bella Riva as distributed to CWA.	Response from CWA: The CWA team was part of these engagements, the proposed amended east-west link road is welcomed, as is confirmation of the Melish station location, the changes will be incorporated and the airport SDP will be amended accordingly. Whilst the east-west link road is not essential at the time of opening of the airport and in the first few years of operations it eventually becomes a key link for road and rail access, medium to long term. CWA welcomes the collaborative approach and is committed to work with Bella Riva closely to ensure that this link is enabled and provided at the right capacity levels at the right time, this dependant and informed by rate of property development and airport traffic growth. CWA acknowledge the shared reliance on the west-east road link, whilst the airport will not require this link at the opening and initial stages of the airport it will become increasingly necessary to use the east-west road link as traffic volumes increases, medium to long term Noting the above CWA agrees that it will be fair and reasonable for it to contribute a percentage to be agreed upon of the cost of the road and bridge between Klipheuwel Road and Bella Riva's western boundary. It is furthermore CWA's understanding that Bella Riva will fund the remaining section of the

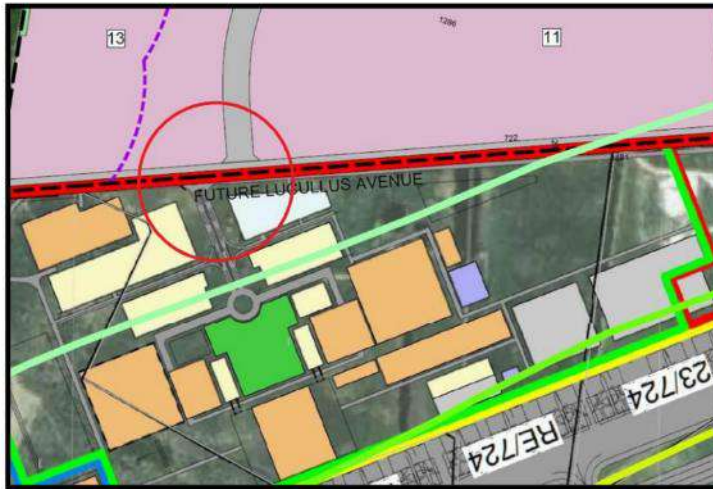


Fig. 5: Positioning and Alignment of Access along Lucullus Avenue

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 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.

road within the Bella Riva precinct i.e. from its western erf boundary to its eastern erf boundary.

For CWA to make a contribution to the, or a portion of the west-east road link it will be important for the full road link to be complete and in doing so provide road users with access from Klipheuwel Road into the airport.

CWA is committed to working with Bella Riva and the City of Cape Town to reach consensus as to how and when the west-east road link will be constructed and funded.

Response from Transport specialist:

1. East-West route alignment

We appreciate the ongoing efforts to make adjustments to the alignment to the benefit of both developments. The CWA SDP will be updated once all comments have been assessed and incorporated. The proposed alignment has been accepted.

2. East-West as access to CWA

The E-W link road will provide good access to the CWA but is not “vital” but beneficial. As illustrated in Fig 7, three future access opportunities exist and as assessed in Section 6.2 of the TIA, the Mellish road access can accommodate the expected CWA transport demand exclusively and is not reliant on the other two access opportunities.

3. Construction of the East-West Link Road

The CWA TIA has not been updated “in an attempt to indicate the entire east-west link road as a responsibility for only Bela Riva”. Fig 7 was presented in all receding Transport Scoping reports, dated 2022 and 2024. The figure merely illustrated connectivity opportunities to the CWA and does not indicate responsibility. As mentioned in par 2 above, the CWA is not “dependent” on the East-West road.

It is our understanding from discussions with the Bela Riva professional team that the East-West link road is a requirement to facilitate the first phase of development of Bela Riva. Not necessarily the entire length, but to the extent

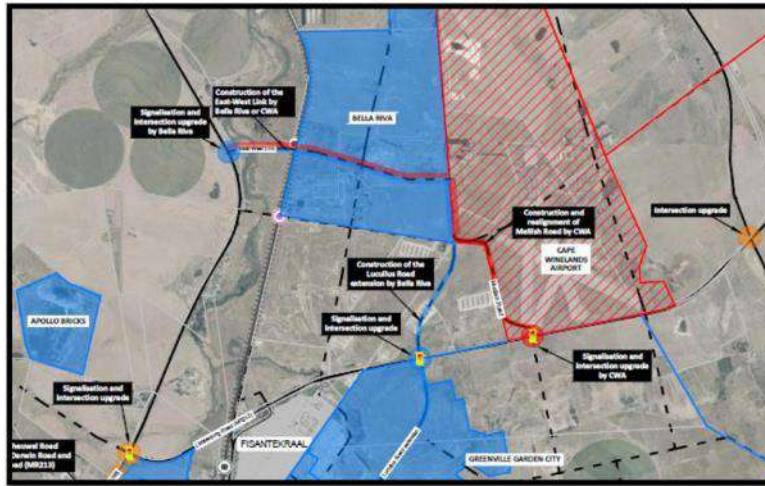


Fig. 6: Portion of Bella Riva above Prescribed Noise Regulations

It has been noted that CWA's TIA has now been updated in an attempt to indicate the entire east-west link road as a responsibility for only Bella Riva. Both CWA and Bella Riva are dependent on the east-west link road for access to their respective later phases. However, Bella Riva is now constrained from rolling out its later phases at pace, as these are now dependent on the outcome of the CWA expansion. In addition, potential restrictions arising from the CWA noise contours further limit our flexibility. These factors significantly reduce the infrastructure CAPEX that Bella Riva can finance upfront. Given the shared reliance on the east-west road, we believe it is fair and reasonable for CWA to contribute 50% of the cost of the road and bridge between Klipheuwel Road and Bella Riva's western boundary. (ie the part of east-west link road external from BR) Bella Riva will fully fund the remaining section of the road, from its western erf boundary to the first internal circle within BR Phase 1.

to provide access to the first phase. However, the latest Bella Riva TIA (dated December 2024) indicated the full East-West link road to provide access from the east and west as illustrated in their TIA section 19:

It is understood that the east west link could only be constructed to intersection "B" until the future Lucullus Road is extended northwards to intersection with the E-W link road. As recommended in the CWA TIA (Section 6.1) the "total traffic conditions scenario assessed the development of Phase 1B of the CWA with the realigned Mellish Road access and the remainder of the East-West link from the first Bella Riva access point as a secondary access." It is clear from this statement that it is not expected that Bella Riva should construct the entire East-West link road.

4. Contribution to the construction of the East-West link road

As mentioned in the sensitivity analysis of the CWA TIA, the East-West link road is not a requirement of the CWA. However, the construction therefore is for Bella Riva. The East-West link will certainly benefit the CWA and therefore the extension to link with the airport is obvious. Similarly, the upgrade and realignment of Mellish Road to intersect with Lichtenberg Road will also benefit Bella Riva traffic especially towards the R304. This will certainly benefit Bel Riva knowing the capacity constraints at the Lichtenberg/Klipheuwel intersection.

The CWA TIA obtained the traffic distribution from the Bella Riva TIA that would use the East-West link Road. A total of 580 and 805 vph is assigned towards the E-W link road during the a.m. and p.m. peak hours respectively. Similarly, this road will attract 260 and 500 vph to/from the CWA once the link is completed. The airport traffic is therefore approximately between 31 and 38% of the total E-W traffic or 35% on average. The statement that 50% of the cost of the bridge and the entire road should be shared by the CWA, it therefore not accurate. However it is acknowledged that the use of a road is for its benefit and not necessarily apportioned to the volume of traffic it accommodates. However, in this case, the Bella Riva development is 100% dependent on the construction of the East-West link road and not the airport.

Conclusion

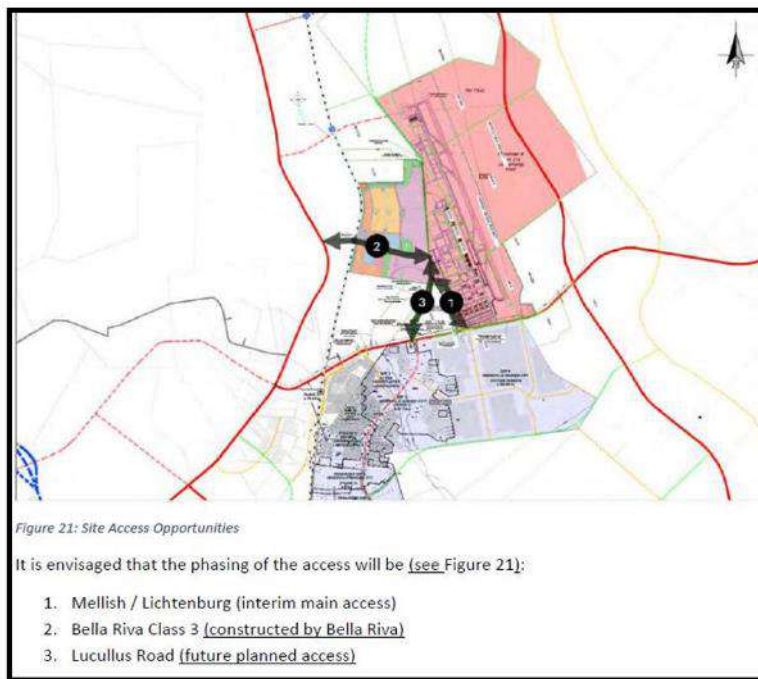


Fig. 7: Amended CWA TIA

The East-West link road will benefit the CWA in the future but is not “vital” for the operations of the airport but it will certainly benefit from this link. The link road is a condition of the Bella Riva development even for its first phase to be developed. Both the East-West and Mellish road links are necessary to accommodate both developments and both will have the benefit although the East-West road is a requirement for the Bella Riva development and Mellish for the airport. The CWA will attract on average 35% of the total traffic when the East-West link road is extended to the access of the CWA although the initial link with Klipheuwel is necessary for Bella Riva only.

6. Runway Design & 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. This adjustment appears to have been a conscious decision, one that increased the impact on Bella Riva, rather than aligning optimally with CTIA as would otherwise have been logical. 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.

Response from CWA:

The proposed runway alignment as an outcome is informed by a number of key considerations:

- Prevailing wind and dominant weather conditions for the site and area;
- Obstacles and topography in surrounding areas beyond the airport site;
- Airspace integration with multiple surrounding aerodromes, Cape Town International and other aerodromes i.e. Stellenbosch, Ysterplaat and Morning Star;

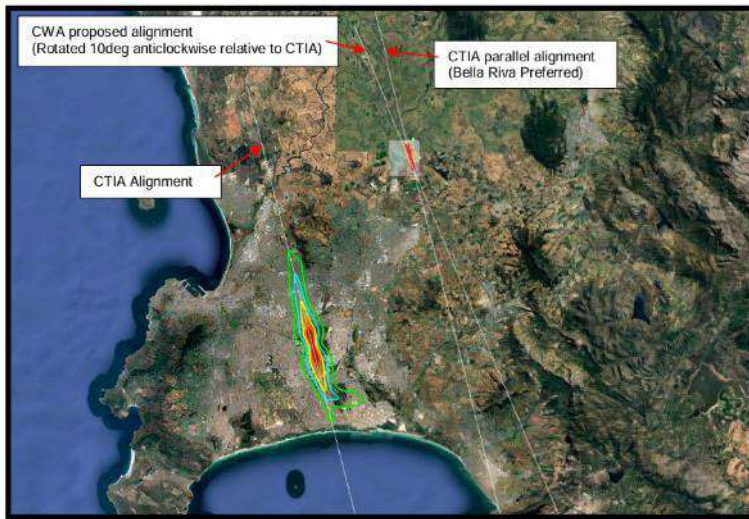


Fig. 8: City of Cape Town Airport vs. Cape Winelands Airport Alignment

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.

It is important to note, the parties previously engaged in negotiations regarding the possible purchase of land parcels in 2022. However, these discussions did not result in an agreement, as CWA's offers were significantly below market value. At that stage, the parties mutually acknowledged that no agreement could be reached. Bella Riva further clarifies that no agreement or understanding was ever concluded as implied; therefore, the CWA's comment in this regard is factually incorrect. Accordingly, while our door remains open to CWA for another discussion on this, a land purchase arrangement between CWA and Bella Riva remains highly unlikely due to the previous negotiation round, and thus, relocating the runway remains Bella Riva's preferred solution.

- Layout, topography and restrictions of the airport property;
- Aircraft routing and noise impact;
- Buildability and affordability of the airfield and 3.5km runway;

Extensive assessments, design options and reviews were conducted by the team of international airport specialists that have done this successfully around the globe over many years now. Local South African specialists worked closely with the international specialists to ensure that the new runway fully meet international standards in terms of operations and safety.

The preferred runway configuration and orientation was subsequently further tested and refined by way of extensive industry consultation with commercial airlines, general aviation operators, surrounding airport owners and operators, air traffic and navigation specialists and authorities to ensure safe and efficient operations. For these reasons, a different orientation is not considered to be reasonable and feasible.

CWA is mindful of the potential impact of the airport on Bella Riva and is committed to finding agreement on affected land parcels.

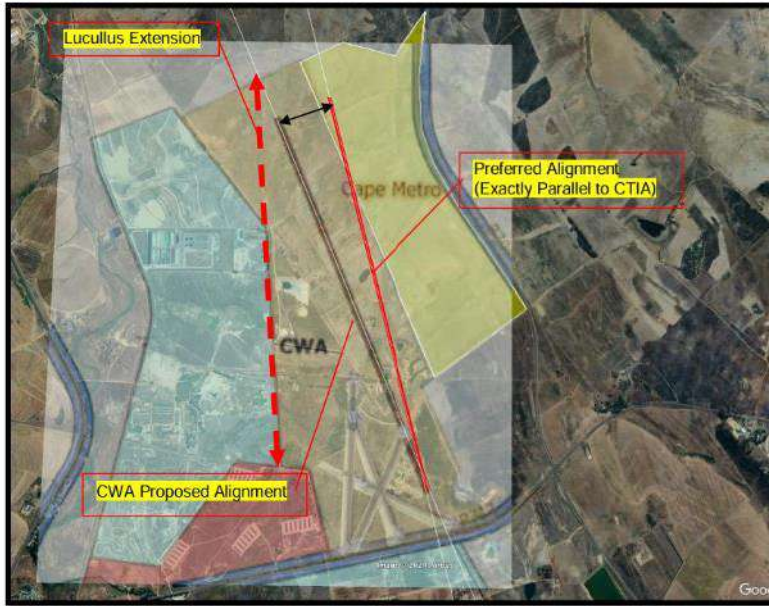


Fig. 8: Preferred Re-Alignment of Runway

Bella Riva, despite already having an existing and approved basket of rights, have already demonstrated significant willingness to accommodate CWA by committing to, and covering the cost of, the realignment application for the east-west access road. Additionally, we undertook a complete redesign of our Site Development Plan (SDP) at our own (high) expense to align with CWA's needs. Given these efforts, we believe it is both fair and reasonable to expect CWA to reciprocate: specifically by revisiting the current runway alignment.

Conclusion: (the following conclusion is also made on context with Mark Wilkinson 25 April 2025 email) We have made numerous concessions in support of CWA's objectives, and we would now like to request a degree of reciprocity. If not as a matter of principle, then at least in

7. Conclusion: (the following conclusion is also made on context with Mark Wilkinson 25 April 2025 email)

Response from specialist:

		We have made numerous concessions in support of CWA’s objectives, and we would now like to request a degree of reciprocity. If not as a matter of principle, then at least in recognition that CWA will rely on Bella Riva to provide essential transport access for all its phases. Placing the full burden on Bella Riva (which has existing basket of rights) risks making it unfeasible for us to break ground, an outcome that benefits neither party. To date, the only tangible concession offered has been the proposal to purchase noise impacted land. However, this does not necessarily benefit Bella Riva and may in fact favour CWA, particularly if such an agreement is made without a clearly defined compensation outline. We’ve made considerable efforts to accommodate the CWA’s input, and we sincerely appreciate that many of their comments reflect general support for the development. However, there remain concerns that need clarification—particularly regarding the vague and undefined references to “noise impacts and mitigation.” Between the general contours and the N70-related commentary, it is still unclear what specific responsibilities are being implied, and where exactly these measures would apply. In principle, it would not be fair or practical to assume that Bella Riva will be responsible for such mitigation. This could negatively influence buyer perception and carries significant financial and cost implications for the development.	In response to the concerns raised regarding “noise impacts and mitigation,” and the terminology referenced in the recent comment, the following clarifications are provided: • The reference of “general contours” in the comment refers to the Scenario-based LRdn maps in the NIA report. These maps presenting the Day-night average sound levels (55 dB(A)+) are mapped for each scenario so all parties can see exactly which parcels of land may be exposed above guideline values. • The reference of the “N70-related commentary” in the comment refers to the contour maps in the NIA that show how many single aircraft events exceed 70 dB(A) at any given spot over 24 h (or 60 dB(A) at night). They help planners decide whether extra façade insulation, indoor layout changes, or operational restrictions are justified. The noise mitigation strategy recommended in the NIA is two-tier: 1. Airport-side measures: flight-path optimisation, continuous-descent procedures and fleet-mix incentives (CWA / ATNS). 2. Land-use / building measures: applied only where dwellings in Bella Riva fall inside the ≥ 55 dB(A) LRdn or high-N70 zones (developer responsibility). For the Bella Riva footprint, under the worst-case Scenario 3 (runway 01/19 at full capacity): • Only 0.38 km² of Bella Riva lies inside the 55-60 dB(A) LRdn band, and none above 60 dB(A). • It also falls in the 10-20 N70 band (i.e. 10–20 aircraft events > 70 dB(A) over 24 h). SANS 10103 treats 55–60 dB(A) as conditionally compatible with residential use given normal building attenuation (~10 dB). As indicated in the responses, further above, the number of N70 events remains below the high concern threshold, even under the full utilisation scenario. This further supports the conclusion that noise impacts on this

			specific residential use will be moderate to low, with no need for exceptional mitigation beyond standard architectural and planning responses. In terms of allocation of responsibilities: • CWA controls noise at source (flight paths, aircraft mix, monitoring). • Municipality controls land-use compatibility and density decisions. • Bella Riva would need to follow standard façade design for a < 0.4 km² section of the estate. This division of responsibilities is considered aligned with the scope and scale of potential impacts and ensures proportional, targeted responses without placing undue mitigation obligations on the developer.
		Further, the CWA’s email refers to the need for a “large” (or possibly even “larger”) public transport hub to meet their operational needs. This would require the sterilization of usable land within our development. As there is currently no agreement between CWA and Bella Riva on this matter, and the specifics of the requirement have not been clearly defined, we will need to assess the impact this could have on both the spatial layout and the overall feasibility of the project—including infrastructure costs. Any such requirement would need to be matched with an appropriate contribution from the CWA.	Response from CWA: CWA is committed to working closely with Bella Riva to reach joint consensus on this matter.
		Important Note: Based on Bella Riva’s experience in dealing with neighbouring landowners and interested party comments, we are concerned about the unqualified support expressed by County Fair and Garden Cities regarding the impact of the CWA expansion on their properties. As per the latest comments report, both parties are still heavily objecting to the proposed CWA. The position taken by these two entities is likely to carry significant weight in determining the final outcome of the CWA expansion, which in turn will directly influence the final layout of Bella Riva. Bella Riva has already made substantial efforts to align its development plans with the proposed CWA layout, as far as reasonably possible. In light of this, we believe it is essential to obtain letters of support from County Fair and Garden Cities to provide greater certainty on the way forward.	Response from CWA: Noted. Discussions with Garden Cities and County Fair are underway.

		We reserve our right to provide further comment during any following processes for the CWA development. Trust the abovementioned suffices.	EAP response: Noted
412	Sean Bradshaw - ACSA	Email dated 13 May 2025: 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.	Email response provided 14 May 2025: 1. Thank you for the comments received
		Letter received via email dated 13 May 2025: COMMENTS ON PROPOSED EXPANSION OF CAPE WINELANDS AIRPORT (CWA), DEA&DP REFERENCE NO. 161313121A5120/2046124 & DWS REF NO: WU33620	-
		1. INTRODUCTION AND BACKGROUND	-
		1.1. The amended In-Process Draft Environmental Impact Assessment Report dated 18th March 2025, appendices, and letter informing I&APs of the above project, dated 19th March 2025, refers.	EAP response: Noted
		1.2. Over the course of this EIA, we have extensively engaged with the EAP, particularly through the submission of our comments on the 8th of December 2023, 26th of August 2024 and 12th of December 2024, respectively, which raised material concerns regarding inter alia airspace, operational sustainability, and need and desirability should the proposed CWA Expansion Project proceed.	EAP response: Noted
		1.3. We again hereby submit our comments in terms of Regulation 40(1) of the Environmental Impact Assessment Regulations, 2014 (as amended) I read with section 240 of the National Environmental Management Act 107 of 1998 ("NEMA") in respect of the amended In-Process Draft EIA.	EAP response: Noted
		1.4. It should be noted that despite responding to our concerns over the past 3 rounds of public participation, the responses received do not adequately assess nor address the issues raised by ACSA.	EAP response:

			All comments received from IAPs are recorded and responded to in the C&R. Where further clarification is requested, it is provided by either the EAP, the CWA or a specialist. CWA response: Comprehensive studies have been conducted as part of the EIA process to thoroughly address concerns raised by all Interested and Affected Parties (IAPs). These studies have been referenced throughout the responses provided to comments, ensuring that concerns are acknowledged and addressed. In addition, responses have been supported by research and analysis. Beyond the studies conducted as part of the EIA process, CWA undertook additional research, which was made accessible during the EIA public participation process. These supplementary studies further strengthen the credibility of the information and was provided as part of CWA's responses, ensuring a comprehensive and well-supported assessment of key concerns. The concerns and comments raised by ACSA, for the most part, lacked supporting data, statistics or empirical evidence to substantiate the issues presented. Without concrete data, the validity of these concerns remains open to interpretation and does not offer an objective basis for evaluation.
		2. NEED AND DESIRABILITY OF CWA EXPANSION PROJECT	-
		2.1. The EIA Regulations require "a motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location"? In our view, the motivation for the need and desirability of the CWA Expansion Project is not sufficiently set out in the Draft EIA.	EAP response: The Need and Desirability of the proposed project is assessed in Section 5 of the amended draft EIAR. The content complies with the requirements of the DEA&DP Guideline and includes additional information on sustainability parameters. The EIA Regulations specifically requires the consideration of how the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity, and need and desirability relates to all of these considerations. To determine if the proposed

			activity is the best option when considering “need and desirability”, it must be informed by the sum of all the impacts considered holistically. In terms of location, please note that the motivation was provided in the amended draft EIAR. There are no location alternatives for this proposed project- it is for the expansion of an existing airport at an existing site with existing impacts.
		2.2. Part 1: The proposed CWA Expansion Project fails to demonstrate adequate necessity or usefulness as required under section 240 of NEMA. Part 2: The current and future capacity of the commercial international airport in the Western Cape, being Cape Town International Airport ("CTIA"), provides sufficient facilities to meet all projected passenger demand until 2050. CTIA has approval for a runway realignment alongside terminal and apron expansion plans, which, as has been previously shared, will more than cater for growth over the next 15 years. The established infrastructure enables regional tourism growth and business expansion without needing a second commercial or diversion airport.	Part 1: EAP response: Section 240 of NEMA refers to Criteria to be taken into account by competent authorities when considering applications. And further states that <i>the CA must take into account all relevant factors, which may include—</i> <i>(i) any pollution, environmental impacts or environmental degradation likely to be caused if the application is approved or refused;</i> <i>measures that may be taken—</i> <i>(ii) (aa) to protect the environment from harm as a result of the activity which is the subject of the application; and</i> <i>(bb) to prevent, control, abate or mitigate any pollution, substantially detrimental environmental impacts or environmental degradation;</i> <u>Response:</u> All potential impacts of the proposed project have been assessed and mitigation developed in order for the CA to be in a position to make a decision. <i>(iii) the ability of the applicant to implement mitigation measures and to comply with any conditions subject to which the application may be granted;</i> <u>Response:</u> The Applicant is technically and financially competent and able to implement the mitigation measures and any conditions of authorisation. <i>(iv) where appropriate, any feasible and reasonable alternatives to the activity which is the subject of the application and any feasible and reasonable</i>

			<i>modifications or changes to the activity that may minimise harm to the environment;</i> <u>Response:</u> Feasible and reasonable alternatives were developed within the Scoping and EIA Phases based on technical, specialist, CWA and IAP input. <i>(v) any information and maps compiled in terms of section 24(3), including any prescribed environmental management frameworks, to the extent that such information, maps and frameworks are relevant to the application;</i> <i>(vi) information contained in the application form, reports, comments, representations and other documents submitted in terms of this Act to the Minister, Minister responsible for mineral resources, MEC or competent authority in connection with the application;</i> <i>(vii) any comments received from organs of state that have jurisdiction over any aspect of the activity which is the subject of the application; and</i> <i>(viii) any guidelines, departmental policies, and environmental management instruments than have been adopted in the prescribed manner by the Minister or MEC, with the concurrence of the Minister, and any other information in the possession of the CA that are relevant to the application.</i> <u>Response:</u> The amended draft EIAR complies to the above in terms of contents and process. <i>(c) take into account the comments of any organ of state charged with the administration of any law which relates to the activity in question.</i> <u>Response:</u> All comments received from organs of state are includes with responses in the C&R for consideration by the CA. Consultation in terms of Section 24O (2) and (3) is done by the EAP on behalf of the CA. Part 2: CWA response: <u>ACSA's approach to market protection to secure growth</u>

			ACSA's prevailing posture appears to prioritise market protection as a mechanism for securing the projected growth into the Cape Town region for the next 40-50 years from now in line with CTIA's airport master plan. ACSA's main ground of Objection is that the ADEIR fails to demonstrate the need and desirability of the expansion of the CWA, which requirement is mandatory for the granting of the EA. Its primary basis for this argument is that the CTIA provides sufficient facilities to meet all projected passenger demand until 2050. That is, with respect, the same as saying that one should never build a new shopping centre because the existing one can meet the demands of customers for the foreseeable future. While it is acknowledged that ACSA has a duty, like any other company, to ensure its own sustainability, it cannot rely on its historical monopoly of the provision of aviation services in the Western Cape to insist on the right to do that in future. Put differently, it cannot argue that it is entitled to all of the growth in the aviation sector in the Western Cape simply because it has always done so before. It is respectfully submitted that the need and desirability of the Project is fully assessed in Section 5 of the ADEIAR. The content complies with the requirements of NEMA, the EIA Regulations and the applicable DEA&DP Guidelines. The EIA Regulations specifically require the consideration of how the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity, and need and desirability relate to all of these considerations. DEA&DP must decide if, when considering need and desirability, and taking into account the sum of all the impacts considered holistically, authorising the expansion of the CWA is justified. <u>ACSA's view of growth and beneficiaries of scheduled commercial traffic (up to 2050)</u> CTIA currently processes 10 million passengers per annum (MPPA). It is our understanding that ACSA conducted an independent air traffic forecast for CTIA and ACSA confirmed that their air traffic forecast for

			scheduled commercial annual passenger volumes for 2050 is 23,6 MPPA into the Cape Town region, where CTIA is the sole beneficiary of this growth. This is in keeping with the independent traffic forecast conducted for CWA, which indicates that an aggregate commercial passenger traffic to the Cape Town region is expected to increase to 22,6 MPPA by 2050, where CWA is the beneficiary of 5,2 MPPA of that growth. Both forecasts indicate growth into the region, highlighting the prospects of unlocking new tourism opportunities, the presence of underlying market demand and demonstrating that there is rising demand. ACSA's point of contention is that ACSA should be the sole beneficiary of this growth. CWA disagrees with this position. <u>ACSA's view of growth and beneficiaries of scheduled commercial traffic (2050+)</u> During the In-Process Public Participation Process (PPP), ACSA stated that <i>"The CTIA ultimate masterplan includes the development of a second parallel runway and associated infrastructure. CTIA can thus ultimately develop to 45 mppa. Therefore, using capacity and demand as a reasoning to justify the need and desirability of the proposed CWA is factually incorrect."</i> CWA does not agree with this statement. The fact that CTIA has a master plan which indicates that CTIA theoretical ultimate capacity of 45 MPPA, does not mean that new entrants into the market should be prohibited until such time as CTIA has reached its full theoretical capacity, 40-50 years from now. <u>ACSA's view on general aviation</u> During the Pre-Application Scoping Public Participation Process, ACSA stated that <i>"We support the relocation of light general aviation to CWA, but not high performance General Aviation like fixed wing, jet engine aircraft."</i> "Laying claim to the high-performance GA market" is another example of market protection and monopolistic overreach by ACSA, noting that not all of the GA operators make use of ACSA facilities. Some are privately owned businesses, operating from privately owned/leased facilities on privately

			owned land. The GA market will, based on their requirements and needs, as well as the value proposition determine where they wish to operate from, be that CTIA, CWA or any other airport. This is purely a market decision, driven by market demands. Ultimately, the market dynamics - including infrastructure availability, cost considerations, service offerings, and overall value proposition - will determine whether operators choose to transition to CWA. <u>ACSA's view on the provision of capacity</u> During the Draft EIR PPP, ACSA stated that "The developer states that <i>"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 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."</i> ACSA continues to define CWA's necessity solely through the lens of capacity needs, arguing that its own ability to expand negates the requirement to expand Cape Winelands Airport. Also arguing that capacity is the most important criteria for assessing the need for a second commercial airport. This perspective remains narrowly focused, lacking consideration of broader industry sustainability, regional connectivity and market evolution. It is not just about the theoretical ability to deliver capacity, it is also about the sustainability of the aviation eco system, which relies on competition too. The NADP of 2019 states that <i>"As illustrated above, ACSA operates a system of nine (9) airports (6 international airports and 3 domestic airports). ACSA airports which are not financially sustainable, are cross-subsidized within the ACSA network to ensure fiscal responsibility and that safety, security and environmental standards are maintained."</i> It can be assumed that CTIA, as one of ACSA's most profitable airports, carries the burden of these additional costs associated with cross-subsidisation due to inefficiencies within the ACSA network - costs that are passed onto the airlines and passengers. Private airport operators, like CWA, will be more cost competitive as it will not have to include these inefficiencies into its business model.

			CWA wishes to reiterate that it is not just about the theoretical ability to provide capacity, it is also about the cost of doing so. With ACSA as the monopoly, the industry has no choice but to accept these inefficiencies and associated costs. <u>ACSA's view on competition</u> From the first round of the Public Participation process (PPP) ACSA started raising concerns that the establishment of CWA would introduce competition, potentially impacting its long-term sustainability. ACSA stated that <i>"We however do not support the development of CWA into an airport which processes scheduled commercial domestic and international traffic for the following reasons:</i> <i>• We believe that the two airports will compete for the same scheduled commercial domestic and international traffic and will therefore not be financially sustainable."</i> Despite demonstrating that the projected growth in the market, exceeds CWA's projections, ACSA has maintained this position. CWA emphasises that maintaining the free working of market forces is fundamental to ensuring competitive and fair business practices. In alignment with the Competition Act, market entry should be encouraged and not be prevented. Furthermore, state-owned entities, like ACSA, are expected to compete with private sector. The White Paper on National Transport Policy, 2021, which states that <i>"Competition, whether for or in the market, will be encouraged where possible, and economic regulation will be applied where appropriate. In the transport sector, a level playing field will be provided, in which state-owned companies (SOCs) are expected to compete with private sector players without undue shielding from competitive forces"</i> Competition will drive, amongst other benefits: • Improved efficiencies • Service innovation • Cost reductions • Growth

			• Infrastructure investment A competitive environment ensures that airlines, passengers and businesses benefit from improved services, fair pricing and enhanced connectivity, ultimately driving sustainable development. By embracing market diversity and infrastructure expansion, CWA reinforces the principle that competition provided for in South Africa's air transport policies. It would strengthen rather than weaken the aviation sector, supporting long-term regional and economic progress. <u>The need for a second commercial airport in Cape Town</u> As per previous responses to ACSA, CWA has adopted an integrated planning approach and remains acutely aware of CTIA's development plans. It is reaffirmed that the need and desirability of CWA extends beyond the provision of additional capacity, encompassing broader strategic, economic and operational motivations that contribute to regional aviation growth. 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. The CWA development is driven by a commitment to market expansion, market diversification and operational efficiency, rather than restricting growth. It aims to broaden industry opportunities, enhance efficiency and maximise profitability for the airlines and provide more choice for passengers. CWA recognises the importance of delivering mutually beneficial solutions to the aviation industry as a whole to ensure sustainability not just for the airport operator but also for the entire aviation ecosystem. Foundational elements driving the justification for CWA and the airport's strategic importance (also refer to DEIAR, Section 5, Needs and Desirability section) are: Addressing the Critical Need for General Aviation Capacity: Currently, the GA market in Cape Town is fractured with an incomplete offering in terms of

		available infrastructure and facilities. Aircraft operations are determined by runway and infrastructure capability, where only the bottom and top end of the market are currently served. On the one end is CTIA with 3.2km runway, capable of facilitating all GA, however given the size and scale of scheduled commercial operations, with priority appropriately granted to scheduled commercial airlines, it is a challenging environment for GA to thrive. On the other end are the current airstrips with runway lengths less than 900m and no landing instrumentation, catering only for light recreational flying, training and some fire & rescue operations. These include Stellenbosch Airfield and Morningstar Flying Club, both of which are municipally owned with no possible room for expansion. Of the airfields listed, they are also totally constrained in terms of hangar capacity, with no further room for light aviation to grow. Core to CWA's value proposition is the provision of additional capacity for general aviation to unlock growth of the GA market. Establishing Cape Winelands Airport as a Reliever Airport for Cape Town: CTIA cannot function as its own reliever airport. CWA will serve as a strategic and complementary airport to CTIA, addressing temporary capacity constraints and enhancing regional aviation efficiency. CWA will play a critical role in providing airport redundancy for Cape Town, ensuring resilience, operational continuity and future-proofing aviation infrastructure. By establishing CWA as a strategic complement to CTIA, the region safeguards against unexpected disruptions, accommodates growing air traffic and reinforces global air connectivity. This approach not only enhances efficiency and flexibility within the aviation sector but also avoids the kinds of challenges we have seen in Cape Town's maritime and rail industry. CWA's strategic role is further emphasised in providing additional temporary capacity during major events in Cape Town, enhancing the city's ability to host large-scale international gatherings, conferences and sporting events. By offering overflow aviation infrastructure, CWA will ensure seamless airport operations, reducing congestion at CTIA and accommodating increased passenger demand. This flexibility strengthens Cape Town's competitiveness when bidding for global events like the Olympics, World Cup, major summits and international expos, positioning the city as a premier destination for event organisers. A strong competitive aviation system would increase the number of air travellers through the Cape Town area, enhance regional accessibility,

			and increase economic opportunities and international visibility, making Cape Town a more attractive host city on the global stage. Direct Scheduled Air Services into Cape Town: Domestic and International: For the past 30 years, ACSA has enjoyed a monopoly position in Cape Town and based on the feedback received from ACSA during this EIA process, it is clear that ACSA seeks to preserve its monopoly. This approach constrains industry growth and does not allow for adaption to the volatility, changing needs and competitive dynamics of the evolving aviation landscape. CWA has adopted an approach of measured conservatism when it comes to direct scheduled traffic growth. As stated above, CWA's air traffic forecast indicates that an aggregate commercial passenger traffic to the Cape Town region is expected to increase to 22,6 MPPA by 2050, where CWA is the beneficiary of 5,2 MPPA of that growth. Both CTIA and CWA's forecasts indicate growth into the region, highlighting the prospects of unlocking new tourism opportunities, the presence of underlying market demand and demonstrating that there is rising demand. Commercial Property Development: Airports become economic catalysts, supporting job creation and regional development. Attracting investment in non-aeronautical ventures not only enhances financial sustainability, but also creates opportunities for businesses, tourism and trade. The broader socioeconomic impact is significant—boosting employment, improving urban connectivity and establishing airports as multifunctional economic hubs that benefit communities and industries alike. CWA as a much closer Alternate Airport and Strategic Enabler for Airlines: • CWA plans to position itself as the preferred alternate airport for CPT for fuel planning purposes. • At only 25km away from CPT, compared to O.R. Tambo International Airport (JNB) at 1,274 km away, CWA will enable a significant reduction in the quantum of additional reserve fuel required to be carried each flight, as imposed by ICAO.

			• This reduction in take-off weight then translates into significant financial, operational and environmental benefits to the airlines for every direct scheduled flight inbound to CPT. The number of actual diversions therefore is irrelevant as it relates to the value that will accrue to the airline industry. • <u>Quantification these benefits:</u> CWA appointed an independent, German based company called PACE Aerospace Engineering and Information Technology to quantify the potential benefits to the airlines. Based on 2019 traffic volumes into CTIA and yielded the following results: • up to 110 million kg reduction in fuel requirements per annum • up to 18 million litres reduction in fuel consumption per annum • up to 56 million kg reduction in CO2 emissions per annum The above translates into a financial benefit to the airline industry of approximately R1,2 billion rand per annum. This value is currently lost to the airline industry without the existence of CWA. An important note is that this value is passed on to airlines while continuing to fly into CTIA. In addition to the significant financial benefits to the airline industry, CWA also enables a significant positive environmental impact. By designating CWA as an alternate airport for direct flights into CPT, airlines can accelerate their progress toward achieving Net Zero carbon emissions, reinforcing CWA's commitment to sustainable aviation. This strategic move not only supports global and national environmental goals but also unlocks valuable revenue growth opportunities, enhancing operational efficiency and profitability on the Cape Town route. With CWA's commissioning date estimated at 2027, another R3,6 billion would have been lost to airlines with direct scheduled services into CTIA up to the date of commissioning. ACSA claims that ACSA can provide sufficient capacity for the next 15 years and therefore CWA is not needed. Should CWA not be expanded for another 15 years, the loss of value to industry will be up to R18 billion. Up to 840 million kg reduction in CO₂ emissions will not be achieved.

		<u>Verification of the benefits:</u> Over the past two years, CWA has actively engaged with international and domestic airlines to validate and confirm the financial, environmental and operational benefits to its operations of the expanded CWA. Through rigorous internal validation processes, airlines have affirmed the advantages offered by CWA as the new alternate airport. [REDACTED] [REDACTED] [REDACTED] [REDACTED] These benefits are real, tangible and meaningful to the airline industry. Cape Winelands Airport’s holistic, multi-criterion approach to aviation sustainability is designed to strengthen the industry, ensuring long-term viability without disrupting existing operations. Both CWA and CTIA can thrive, proving that sustainable growth and competition can coexist and complement each other. Airline partners stand to benefit significantly through enhanced profitability, improved environmental performance and optimised operational efficiency, reinforcing the value of diversification and infrastructure expansion. The introduction of CWA will not only support Cape Town’s resilience but also positions Cape Town as a more competitive and globally connected destination. This balanced approach ensures progress within an evolving market landscape.
	2.3. CTIA currently manages record-breaking passenger volumes without experiencing any measurable stress. The 2024 financial year saw CTIA handle 350,000 additional international passengers above its 2019 pre-COVID numbers. There is no indication or empirical evidence that CTIA infrastructure restricts tourism development. Further, the Applicant has not demonstrated that the CWA Expansion Project has any capability or prospects of unlocking new tourism opportunities. As stated in previous submissions, the ultimate capacity as per the Master Plan for CT IA is 45 million passengers; CTIA's current capacity with existing infrastructure is 145 million passengers, and it is currently processing 10 million passengers. Therefore, there is plenty of capacity for future growth. ACSA already has regulatory approval and confirmed budget for several capacity-enhancing projects. The need and desirability of the CWA project	CWA response: <u>Part 1: Confirming the prospects of new tourism opportunities</u> As stated in section 2.2 above: CTIA currently processes 10 million passengers per annum (MPPA). It is our understanding that ACSA conducted an independent air traffic forecast for CTIA and ACSA confirmed that their air traffic forecast for scheduled commercial annual passenger volumes for 2050 is 23,6 MPPA into the Cape Town region, where CTIA is the sole beneficiary of this growth. This is in keeping with the independent traffic forecast conducted for CWA, which indicates that an aggregate commercial passenger traffic to the Cape

		must be considered in the context of the available spare capacity at CTIA, which is determined in terms of the National Aviation Policy and the National Airports Development Plan	Town region is expected to increase to 22,6 MPPA by 2050, where CWA is the beneficiary of 5,2 MPPA of that growth. Both forecasts indicate growth into the region, highlighting the prospects of unlocking new tourism opportunities. ACSA's point of contention is that ACSA should be the sole beneficiary of this growth. CWA disagrees with this position. In addition, as highlighted in section 2.2 above, there multiple reasons why as second airport is required in Cape Town particularly noting that capacity is not the only driver in considering a second airport for Cape Town. Part 2: Please refer to section 2.2 above. CWA reiterates that available capacity is not the only consideration for the need of a second airport. Throughout the public participation process, ACSA has relied on its Development Plans and Master Plan as grounds of its Objection. In summary, the Development Plans make provision for ACSA's activities up to 2050 with a capacity of 23,6 million passengers per annum (MMPA), while the Master Plan makes provision for ACSA's activities until it reaches a capacity of 45 million passengers per annum (MPPA), 40 to 50 years from now. ACSA's comments during the public participation process are predicated on the idea that ACSA is entitled to all of the growth in the aviation sector in the Western Cape. It is respectfully pointed out that, as a responsible company, discharging its obligations to manage Company Airports, in developing its Master Plan, ACSA is simply planning for the future, as any other responsible company would do. However, ACSA's Master Plan has no statutory status; is not binding on third parties or organs of state; and therefore no more weight should be given to ACSA's Master Plan, than the strategic plan of any other I&AP. If ACSA has failed to take into account the possibility that another airport may legitimately compete for a part of the aviation sector's business in the Western Cape, the Master Plan may have to be revised, as it would for any other change in the operating environment. That is the nature of a strategic plan. An airport master plan serves as a guiding document for that airport, shaping future possibilities rather than guaranteeing infrastructure development. It is

			a conceptual roadmap, identifying development priorities, expansion possibilities and strategic goals, but it does not include detailed execution steps, funding commitments or regulatory approvals required for implementation. Its success depends on market forces, financial backing, government policy and operational feasibility, making it an evolving blueprint rather than a fixed commitment. Practical execution depends on board of directors, government approvals, financing, market demand and stakeholder coordination, all factors that go beyond the scope of a master plan. The presence of CTIA's master plan does guarantee the additional capacity it envisions. It also has no statutory status and is not binding on CWA.
		2.4. The Applicant states: "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'. The incorrect narrative that CTIA does not have capacity has been addressed on numerous occasions during this EIA process. As part of the G20 Summit schedule of meetings, the Cape Town area is hosting approximately 15 meetings, where CTIA serves as the port of entry. In addition, many large-scale sporting events have been hosted in and around the Cape Town Area over the past years, which illustrates CTIA's ability to accommodate additional surges in demand It must be noted that countries develop airports for sustained air traffic growth rather than sporadic events	CWA response: Refer to the following articles highlighting the missed opportunity for Cape Town due to the lack of airport redundancy. Cape Town 'disappointed' as Joburg gets to host G20 Summit thanks to airports, hotels: https://www.news24.com/business/economy/g20-summit-joburg-pips-cape-town-ethekweni-as-host-city-thanks-to-airports-hotels-20241028 GTA's Head: Destination Marketing and Communication Barba Gaoganediwe told Tourism Update that Cape Town has not met the specific infrastructural criteria needed to accommodate the volume of high-level delegates attending the summit. "Johannesburg exceeded the criteria required to host the G20. These requirements included the number of available international airports, accommodation near airports and venues that would not cause disruptions to the general public," he said: https://www.travelnews.co.za/article/johannesburg-defends-g20-summit-readiness There is need for a reliever airport in Cape Town. As previously stated, CWA, as a reliever airport will perform multiple functions, from relieving congestion at CTIA during times of temporary increased activity or providing redundancy to the City of Cape Town in times when the airport is closed for an extended period of time. As a reliever airport:

			• 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. • CWA will contribute toward continuity of economic activity (trade and tourism) in the event of an extended closure at CTIA. • CWA could provide additional temporary or permanent capacity during peak periods (slot constraint times and peak seasons noting the seasonal nature of visitor trends) • CWA will offer redundancy in the event of catastrophic fires, structural failures, fuel or power supply interruptions etc, etc Added to that the benefits of having a second airport, as is the case with most major prospering cities, will ensure full redundancy in the event of a failure of infrastructure, services or systems at either of the two airports.
		2.5. The planned airport diversion role of the CWA Expansion Project remains speculative. CTIA only had two runway closures during the year 2023, and despite this, operational resilience was achieved through secondary cross-runways and displaced threshold procedures. The Diversion rationale does not provide adequate justification for the need and desirability of a second international airport in Cape Town. Therefore, it is unlikely that a limited number of diversions creates the need for a second international airport.	CWA response: If environmental authorisation is granted, CWA's role as a diversion airport will be a fact, not a matter of speculation. ACSA's claim is made without supporting evidence. The fact that CTIA experienced only two runway closures in 2023 is irrelevant to the discussion and further highlights that ACSA fundamentally misinterprets the concept of airport redundancy, contingency planning and CWA's role as a diversion airport for fuel planning purposes. The value generated for airlines extends beyond actual diversion events. It is realised on every flight for airlines with direct scheduled services inbound to CTIA. Please refer to section 2.2 which provides the foundational elements driving the justification for CWA and the airport's strategic importance. Also refer to DEIAR, Section 5, Needs and Desirability section. CWA's role and value proposition as an alternate airport is highlighted below: CWA as a much closer Alternate Airport and Strategic Enabler for Airlines: CWA plans to position itself as the preferred alternate airport for CPT for fuel planning purposes.

		• At only 25km away from CPT, compared to O.R. Tambo International Airport (JNB) at 1,274 km away, CWA will enable a significant reduction in the quantum of additional reserve fuel required to be carried each flight, as imposed by ICAO. • This reduction in take-off weight then translates into significant financial, operational and environmental benefits to the airlines for every direct scheduled flight inbound to CPT. The number of actual diversions therefore is irrelevant as it relates to the value that will accrue to the airline industry. • <u>Quantification these benefits</u>: CWA appointed an independent, German based company called PACE Aerospace Engineering and Information Technology to quantify the potential benefits to the airlines. Based on 2019 traffic volumes into CTIA and yielded the following results: • up to 110 million kg reduction in fuel requirements per annum • up to 18 million litres reduction in fuel consumption per annum • up to 56 million kg reduction in CO2 emissions per annum The above translates into a financial benefit to the airline industry of approximately R1,2 billion rand per annum. This value is currently lost to the airline industry without the existence of CWA. An important note is that this value is passed on to airlines while continuing to fly into CTIA. In addition to the significant financial benefits to the airline industry, CWA also enables a significant positive environmental impact. By designating CWA as an alternate airport for direct flights into CPT, airlines can accelerate their progress toward achieving Net Zero carbon emissions, reinforcing CWA's commitment to sustainable aviation. This strategic move not only supports global and national environmental goals but also unlocks valuable revenue growth opportunities, enhancing operational efficiency and profitability on the Cape Town route. With CWA's commissioning date estimated at 2027, another R3,6 billion would have been lost to airlines with direct scheduled services into CTIA up to the date of commissioning.

		ACSA claims that ACSA can provide sufficient capacity for the next 15 years and therefore CWA is not needed. Should CWA not be expanded for another 15 years, the loss of value to industry will be up to R18 billion. Up to 840 million kg reduction in CO₂ emissions will not be achieved. <u>Verification of the benefits:</u> Over the past two years, CWA has actively engaged with international and domestic airlines to validate and confirm the financial, environmental and operational benefits to its operations of the expanded CWA. Through rigorous internal validation processes, airlines have affirmed the advantages offered by CWA as the new alternate airport. [REDACTED] [REDACTED] [REDACTED] [REDACTED] These benefits are real, tangible and meaningful to the airline industry.
	2.6. The weather at CTIA and CWA is most likely to be similar, being only 22km apart, so weather-related diversions from CTIA are likely to also impact CWA. The Appendix 22 "Alternate Aerodrome Feasibility Study", which is not an independent study, uses weather information from CTIA's AWOS, as CWA does not have any weather data, and provides an unconvincing explanation why this data can be applied to CWA. Stakeholders and airmen have reported that the fog prevalent at CWA will take longer to lift than at CTIA This is due to radiation fog and the fact that CTIA has stronger winds to lift the fog. The presence of water, vegetation, grass, and natural vegetation prevalent at CWA will have a negative impact on fog and LVO, making CWA less suitable as an alternate airport, as shared in the EIA submission.	CWA response: CWA is in agreement with ACSA that there will be similar weather conditions at CTIA and CWA. The benefits to industry will still be derived as the selection of an alternate airport is regulatory requirement for every departing flight as it is a planning activity. Airlines were issued with the weather reports as part of their internal assessment to determine whether CWA will be a suitable alternate airport for their direct scheduled operations into CTIA. Following their assessments which included their own weather data sets, and noting the similar weather conditions, they concluded that CWA will be suitable as a planning alternate airport for 95% and above of the time.
	2.6. It would be irresponsible to advise airlines to reduce fuel uplift based on this speculation in the CWA business case to reduce diversion fuel, especially when aircraft cannot land at both CTIA and CWA This poses a serious safety risk to the Western Cape, and a more detailed analysis would be required. It is of utmost concern that no mention is made of the safety risks involved. Such a presumption is irresponsible, and further studies are imperative to safeguard the safety of passengers. The	CWA response: ACSA's statements regarding safety risk are inaccurate and uninformed. The viability of CWA as an alternate airport has been rigorously evaluated by the airlines. This comprehensive assessment was conducted by multi-disciplinary and cross-functional teams, including Chief Pilots, Pilots, Network Planners, Dispatch Teams and Operational Experts, all specialists in their

		protection and well-being of all stakeholders within our airspace should remain top priority.	respective fields. Through internal validation and due diligence, these airlines have confirmed that CWA meets the criteria as a suitable alternate airport for fuel planning purposes. These industry professionals possess deep expertise in aviation safety requirements, ensuring that all aspects of operational integrity and risk management are fully understood and accounted for. CWA will be a licensed aerodrome, subject to the same rigorous safety, rescue and firefighting services (RFFS), instrument approach, runway length, and meteorological requirements as any alternate airport used in fuel planning. Further, the decision to designate an airport as an alternate is made by the airlines themselves and can't be taken without approval through each airline's Safety Management System (SMS) by their flight planning and dispatch departments. Thus, if an airline deems it unsafe to designate CWA as an alternate for a particular flight, then the airline will not do so for that particular flight. The reduced fuel uplift is thus a by-product of the optimised planning and is only applicable when airlines are permitted to designate CWA as an alternate airport, after a thorough risk assessment by the airline taking into consideration meteorological and other factors expected to be present at the time of landing as prescribed by each airline's Safety Management System. The Alternate Aerodrome Feasibility Study (Appendix 22) indicated that even after considering weather, CWA will be suitable for selection as an alternate for >95% of the year. See below excerpt from Pg 16 of Appendix 22: <i>"The results of the weather analysis indicate that CWA is very well suited to serve as a destination alternate. Regarding the weather situation, it is expected that CWA can be planned as the destination alternate aerodrome for CPT during 95,66% of the annual operating time. Compared to other destination alternate aerodromes over the world, this is a remarkably high availability."</i>
		2.7. The Applicant cites on numerous occasions in their responses the welcomed 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". The statement must be read in the context that ACSA has no mandate on the	CWA response: ACSA's CEO stated (on Moneyweb, on SAFM on 29 January 2025) that "the new airport will not pose a threat to the existing operations of Cape Town

		licensing of airports or preventing the development of non-ACSA airports, as these matters fall within the mandate of the South African Civil Aviation Authority ("SACAA") and the Department of Transport. ACSA does, however, as the license holder of Airports, have a mandate to protect both its own customer, stakeholder and the national interest in terms of safe and efficient airport operations.	International', and that "the two airports can coexist and complement each other". CWA welcomed this statement, with which it agreed. However, it now appears that this statement is being qualified or even retracted. ACSA says in its Comment and Objection that "the statement must be read in the context that ACSA has no mandate on the licensing of airports or preventing the development of non ACSA airports as these matters fall within the mandate of the CAA and the Department of Transport. That is not disputed. However, the Objection goes on to say that "ACSA does, however, as the licence holder of airports, have a mandate to protect both its own customers, stakeholders and the national interest in terms of safe and efficient airport operations." It is unclear how an objection to an application for environmental authorisation amounts to protection of customers, stakeholders or the national interest. It is respectfully submitted, firstly, that the CEO's initial statement was correct and that the two airports can coexist and complement each other, and secondly, that it is not legitimate to use an environmental process to advance anti-competitive interests. <u>CWA will improve—not harm—airspace efficiency through modern navigation technologies</u> The proposed expansion of CWA does not compromise safe and efficient operations. Safety is and will remain paramount to CWA, ensuring that all operations meet the strictest regulatory and industry requirements for the benefit of passengers, airlines and the broader aviation sector. CWA will remain steadfast in upholding the highest safety standards, adhering to global best practices. With experienced airport professionals leading this development, there is a deep understanding of what it takes to operate a safe and efficient airport. Their expertise will ensure that stringent safety protocols, industry best practices and operational excellence remain at the core of CWA's vision, reinforcing its commitment to the highest standards of aviation safety and reliability. Airports are highly regulated environments.

			The proposed CWA expansion will inject efficiency in the broader aviation ecosystem, by unlocking significant financial, environmental and operational advantages to airlines. The claim that CWA will cause inefficiencies in Western Cape is also not supported by evidence. CWA is being developed to enhance regional airspace efficiency through Performance-Based Navigation (PBN) and strategic integration. <u>1. Performance-Based Navigation Enables Efficient, Predictable Operations</u> CWA will use Performance-Based Navigation procedures—such as Area Navigation (RNAV), Standard Instrument Departures (SIDs), Standard Terminal Arrival Routes (STARs), and approaches—which allow for precise, repeatable flight paths independent of ground-based navigation aids. This reduces route spacing, supports optimal climb/descent profiles and improves traffic flow management. <u>2. Fast-Time Simulation Confirms Compatibility</u> A 2023 Fast-Time Simulation demonstrated that CWA’s routes can safely coexist with CTIA traffic without conflict, using existing airspace structures enhanced by Performance-Based Navigation. The simulation confirmed that traffic from both airports can be independently sequenced and managed. <u>3. Multi-Airport Efficiency and Resilience</u> CWA adds capacity, redundancy and resilience to the Western Cape network. It reduces overreliance on CTIA and supports regional growth. With Performance-Based Navigation and centralised flow management (e.g., Central Airspace Management Unit, CAMU), multi-airport regions are globally recognised as efficient, not problematic. CWA will improve—not harm—airspace efficiency through modern navigation technologies, validated simulations and alignment with global best practices. ACSA’s assertions of inefficiency are incorrect and ignore both the design approach and international standards for multi-airport airspace management.
		2.8. The information presented by the Applicant in the Draft EIA fails to support the need for establishing an entirely new commercial airport, as	EAP Response:

		aircraft fuel reserve planning, and airport capacity does not warrant such development. The CWA Expansion Project is positioned to be an unnecessary and unjustifiable project, which fails to meet the legitimate requirements of the aviation sector in the Western Cape region.	The proposed project is for the expansion of the existing airport with existing aviation rights at an existing airport. CWA response: Please refer to section 2.2, where the foundational elements driving the justification for CWA and the airport's strategic importance are reaffirmed. The need and desirability of the CWA Expansion Project is based on the normal evolutionary expansion of an existing airport to facilitate air services to a larger gauge and regularity, which will introduce airport competition within the broader Cape Town region. That follows a similar process as another independently owned airport, Lanseria, did in Gauteng. Lanseria evolved from a very small rural airport to one which now provides competitive services as those provided by ACSA at OR Tambo International Airport within the Johannesburg and Gauteng region. The evolution of CWA will establish competition as opposed to the protection of CTIA's monopoly within the larger gauge and frequency of operations. That does not amount to an "entirely new commercial airport", nor a "disproportionate response to an unproven aviation need" and is necessary and desirable. <u>A more strategic approach to airport development is essential</u> The Western Cape is adopting a structured approach to growing air traffic into the region. Through the air access initiative, the region has seen consistent and robust growth since its inception in 2017. While Wesgro Air Access focusses on growing trade and investment, agencies like Cape Town Tourism focusses on positioning Cape Town as a destination of choice. It is our understanding that ACSA conducted an independent air traffic forecast for CTIA. ACSA confirmed that their forecast for scheduled commercial annual passenger volumes for 2050 is 23,6 MPPA (million passengers per annum). This is in keeping with the independent traffic forecast conducted for CWA, which indicates that an aggregate commercial passenger traffic to the Cape Town region is expected to increase to 22,6 MPPA by 2050. Both forecasts indicate growth into the region, highlighting the prospects of unlocking new tourism opportunities and the need for additional airport infrastructure. ACSA's point of contention is that ACSA should be the sole beneficiary of this growth.

			To ensure that we don't restrict growth into the Western Cape it is critical to ensure that the available aviation infrastructure is able to meet the demand, with an emphasis on the sustainability of the broader aviation sector. The expansion of CWA airport has a direct correlation to this. CWA urges ACSA to refrain from drawing conclusions on behalf of the aviation sector and the Western Cape when assessing the legitimacy of industry requirements. To ensure a fair and objective evaluation of the CWA expansion, it is essential to separate what serves ACSA's interests from what is truly beneficial for the aviation sector and the broader Western Cape region. The opportunities and benefits that CWA's expansion presents will remain inaccessible if ACSA continues to preserve and protect its monopoly. A more strategic approach to airport development is essential, one that not only ensures ACSA's sustainability but also unlocks new opportunities for growth of the broader aviation sector. By embracing competition and expanding infrastructure, this approach would enhance the sustainability and profitability of airlines, ultimately driving economic development and contributing to the growth of both the region and South Africa.
		2. CONCERNS REGARDING POTENTIAL IMPACT ON OPERATIONAL SUSTAINABILITY OF CTIA	-
		1.1. The comparison between Cape Town and international cities, such as London, Washington D.C. and Milan, is based on flawed assumptions. These global cities serve populations in the tens of millions and are major economic hubs with high volumes of air traffic, i.e. conditions that justify multiple commercial airports. Even then, their airports are typically spaced 35 to 50 kilometres apart, ensuring operational and market separation. In stark contrast, the proposed CWA Expansion Project would be located just 22 kilometres from the CTIA, a distance too short to justify the need for a second major commercial airport.	CWA response: CWA is located from 46 km away from CTIA by road and 22km as the crow flies. The argument that comparing Cape Town to cities like London, Washington D.C. and Milan is flawed misinterprets the purpose of the comparison. These international examples were not cited to equate Cape Town's market size with global megacities but rather to demonstrate a critical and well-established principle - that multiple high-traffic airports can coexist safely and efficiently in close proximity when supported by proper airspace design and operational procedures. The reference to these cities in the CWA Concept of Operations is strictly to demonstrate what is operationally achievable—not to draw economic or demographic parallels.

			It is intended to show that physical distance alone is not a limiting factor. In fact, many of the airports referenced operate within 20 to 30 kilometres of each other. The 22-kilometre separation between CWA and CTIA (as the crow flies) is entirely within the range of international best practice. Suggesting that this distance is "too short" ignores decades of successful precedent and misrepresents the realities of modern airspace management. To dismiss these examples is to ignore global standards and constrain Cape Town's growth based on outdated assumptions.
	3.1. A more appropriate comparison is with other South African provinces. Gauteng is the only province in South Africa that has two international airports: O.R. Tambo International Airport ("ORTIA") and Lanseria International Airport, which are approximately 39 kilometres apart. The market justification for this dual-airport system lies in the province's dense population, strong regional economic base, and high volume of air traffic.	CWA response: • The distance between CWA and CTIA is approximately 22km as the crow flies. • The distance between CWA and CTIA is approximately 46km driving distance. • The distance between Lanseria and ORTIA is approximately 40 km as the crow flies. • The distance between Lanseria and ORTIA is approximately 54,6km driving distance. Much in the same way as CWA's Expansion Project, Lanseria also followed a similar growth path of normal evolutionary expansion of an existing airport to facilitate air services to a larger gauge and regularity. Lanseria's expansion was driven by an airline, Comair, in an attempt to differentiate between its BA brand and its LCC brand, Kulula.com. Comair even provided essential funding for Lanseria's initial upgrade to handle scheduled traffic. Soon this was followed by Mango, SAA's LCC and later by FlySafair. This was much like the secondary airports established in Europe to cater for LCCs. ACSA's statement that Lanseria's market justification for this dual-airport system lies in the province's dense population, strong regional economic base, and high volume of air traffic is therefore incorrect.	
	3.2. In contrast, the Western Cape has a population of approximately 7 million, less than half of Gauteng's, and a more limited domestic air traffic profile. The distance between the CTIA and the proposed CWA Expansion Project is a mere	CWA response: The distance data provided by ACSA is factually incorrect:	

		22 kilometres, which is much shorter than the distance between ORTIA and Lanseria. The reality is that there is currently no underlying demand, density, or diversification to justify a second commercial hub. Establishing a second commercial airport within such a short distance in a smaller, less economically diverse province would likely lead to duplication, inefficiencies and unsustainable competition for limited traffic, rather than complementarity.	• The distance between CWA and CTIA is approximately 22km as the crow flies. • The distance between CWA and CTIA is approximately 46km driving distance. • The distance between Lanseria and ORTIA is approximately 40 km as the crow flies. • The distance between Lanseria and ORTIA approximately 54,6km driving distance. <u>Addressing ACSA's comment that there is currently no underlying demand</u> Refer to section 2.2 which indicates that ACSA conducted an independent air traffic forecast for CTIA and ACSA confirmed that their forecast for scheduled commercial annual passenger volumes for 2050 is 23,6 MPPA (million passengers per annum). This is in keeping with the independent traffic forecast conducted for CWA, which indicates that an aggregate commercial passenger traffic to the Cape Town region is expected to increase to 22,6 MPPA by 2050. Both forecasts indicate growth into the region. These growth projections reflect expectations of rising demand and is built on the assumption that underlying demand already exists or will soon materialise. The projected growth also signals that the market hasn't yet absorbed all potential travel need, meaning underlying demand is indeed present. The claim by ACSA that no underlying demand exists starkly contradicts its own projections, which are predicated on latent and rising demand in the regional air travel market. As stated before, ACSA's point of contention is not that there is no underlying demand - on the contrary its own growth projections demonstrate the opposite - its point of contention is that ACSA should be the sole beneficiary of this growth. A stance that raises significant concerns around equitable market access. <u>Addressing ACSA's concerns regarding Diversification</u> See Section 3.1 in for a summary of Lanseria's phased development and its role in enabling airlines to introduce distinctive service offerings within a

			competitive framework as an example of organic growth and diversification in the market. <u>Addressing ACSA's concerns regarding potential duplication and inefficiencies of infrastructure</u> ACSA's monopoly-driven approach raises concerns, as it seeks to bypass key infrastructure development principles by limiting competition. The expansion of CWA does not threaten ACSA's operational sustainability, provided it follows prudent business practices. By adapting to market shifts and increasing competition, ACSA can maintain stability while ensuring responsible infrastructure investment. The existing regulatory framework safeguards ACSA from financial risk, as long as investments are strategic and aligned with actual demand, rather than excessive expansion. This is further validated by 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. ACSA's monopoly status does not eliminate its responsibility to follow a structured approach in infrastructure development, ensuring alignment with Infrastructure Development Life Cycle principles. A disciplined, strategic investment framework allows ACSA to allocate capital efficiently, avoiding unchecked expansion that disregards market shifts, evolving industry demands and changing economic conditions. Operational sustainability will depend on how well each phase of the Infrastructure Development Life Cycle is executed with sustainability in mind. It will be irresponsible of ACSA to blindly continue with infrastructure investment without adjusting their input parameters informed by a review of the strategic landscape and environment. ACSA's view that infrastructure development can proceed based on demand projections and development plans, which disregards broader market shifts and industry evolution is flawed. This deviates from internationally endorsed life cycle frameworks, which mandate agile responsiveness and continuous adjustment to changing conditions.

			In promoting operational sustainability and investment in efficient infrastructure, there are several control mechanisms in line with the Infrastructure Development Life Cycle that safeguard responsible investment decisions by airport developers and owners, like ACSA, prior to the investment decision: • Period reviews: Periodic reviews to reassess traffic forecasts, ensuring infrastructure plans remain relevant in a changing market. • Funders assessment of investment viability: It is common practise for debt funders evaluate several key factors when assessing an airport operator's investment viability, ensuring financial stability and long-term profitability. This will include assessing the viability of the investment under various passenger growth scenarios. • For ACSA: Investment in efficient infrastructure, secures guaranteed returns through tariffs. ACSA's insistence on adhering rigidly to a fixed plan runs counter to Infrastructure Development Life Cycle principles, which prioritise adaptive recalibration in response to evolving conditions. It further stands in contrast to globally endorsed best practices by IATA and ICAO that promote demand-responsive, adaptable and cost-effective infrastructure planning. CWA has previously provided an extensive response, demonstrating that ACSA's sustainability is not at risk, with ACSA's regulatory framework designed to provide robust protection. As long as ACSA does not overinvest in infrastructure, by matching capital asset investment to the activity levels driven by demand, ACSA will be sustainable. <u>Addressing ACSA's concerns regarding unsustainable competition for limited traffic</u> In response to ACSA's concern regarding unsustainable competition for limited traffic, please refer to section 2.2.

		4. CONCERNS REGARDING POTENTIAL SOCIO-ECONOMIC IMPACTS ON CTIA AND SURROUNDING INDUSTRY	-
		4.1. The proposed CWA Expansion Project creates major socio-economic problems that endanger the well-established aviation system operated from CTIA. CTIA operates as an essential economic hub and serves as the vital economic core of the Western Cape region. CTIA maintains a large workforce, inclusive of direct and indirect jobs which spreads across the aviation and tourism sectors, alongside the logistics and hospitality industries. The Cape Town workforce is at risk of major job losses because of traffic diversion to another airport, which may lead to the elimination of certain economic activities instead of developing new ones. For example, companies like surrounding hotels and car rental operations, as well as logistics services and catering services, which are dependent on CTIA's flight volumes, will be severely impacted by the shift of air traffic to CWA, which could lead to business contraction and possible downsizing or closure. All this would result in job losses and economic inefficiencies.	Response from socio-economic specialist: This is addressed on p. 85 of the Socio-Economic Impact Assessment. CTIA is likely to experience a level of displacement for travellers and business activity that may impact direct and indirect employment associated with CTIA. Notwithstanding, it is possible and highly likely that the CWA could have what is termed a demonstration effect on CTIA and other businesses. This implies that the introduction of CWA could trigger upgrades and improvements, as opposed to a situation where Cape Town only has one airport and no alternatives. Such improvements would result in business growth and innovation, which would not have occurred without the demonstration impact the CWA is likely to experience. This is a sound economic principle, resulting in additional agglomeration benefits that lead to efficiency gains for firms when they cluster in nodal areas. Demonstration effects and agglomeration are not mutually exclusive. EAP response: The Socio-economic IA states <i>The CTIA may experience a level of product market displacement¹⁵ from travellers (also referred to as demand displacement) over the medium term</i>, where medium term refers to 5 – 10 years post construction.
		4.2. Airport expansion does not create market demand because airports operate according to existing passenger requirements. In fact, airport traffic emerges from regional economic growth and tourism trends, together with population expansion, rather than infrastructure development. The CWA Expansion Project lacks sufficient evidence to demonstrate its ability to draw new independent passenger demand. Further, the Draft EIA lacks sufficient evidence to demonstrate that the Western Cape market requires additional airport capacity beyond what CTIA already provides.	CWA response: This has been addressed in section 2.2, 2.3 and 3.2 above.

		4.3. The EIA Application fails to meet the requirements of "sustainable development" as defined in NEMA, as it does not sufficiently assess and integrate the social, economic and environmental factors of the proposed activity. The Draft EIA fails to demonstrate that new economic growth or meaningful public benefits will be created by the CWA Expansion Project since it primarily relocates economic activity between two nodes. The EIA Application remains insufficient because it lacks a comprehensive socio-economic impact assessment and fails to address these fundamental concerns properly. The proposed CWA Expansion Project near CTIA will most likely disrupt aviation and tourism value chains and redirect important investments, which will weaken regional economic stability. The proposal represents both an untimely measure and an unprogressive economic approach.	EAP response: The aspect of sustainable development and assessment of the criteria is included in the amended draft EIAR Section 5 and complies with the NEMA Guideline on Need and Desirability in terms of content and process. The scope of the proposed project is for the expansion of an existing airport at an existing site and does not relocate economic activity from CTIA and CWA as part of the scope of the project. The assumption by the IAP <i>"The proposed CWA Expansion Project near CTIA will most likely disrupt aviation and tourism value chains and redirect important investments, which will weaken regional economic stability. The proposal represents both an untimely measure and an unprogressive economic approach"</i> is not supported by independent specialist studies conducted as part of the EIA process. Response from socio-economic specialist: The Socio-Economic Impact Assessment is prepared in accordance with specialist guidelines for social and economic input into EIA processes. These guidelines have been followed in the preparation of the socio-economic impact assessment report, ensuring conformity with the requirements for specialist input.
		5. CONCERNS REGARDING POTENTIAL IMPACT ON AIR TRAFFIC MANAGEMENT & AIRSPACE SEPARATION	-
		5.1. The proposal to develop the CWA into a full commercial airport is concerning in terms of the management and safety of the airspace within Cape Town, which is a limited and shared resource. The introduction of a second commercial airport within this space, without proper air route design, modelling, or airspace simulations, poses risks of operational conflict, congestion and safety challenges CWA iterates "that their 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 Response: <u>Addressing ACSA's Concern regarding Airspace Safety</u> ACSA relies for its objection on air traffic and safety concerns. As explained above, these issues are the remit of the Civil Aviation Authority ("CAA"). CWA currently operates under an aerodrome licence issued by the CAA ("CAA Licence") but is obliged to obtain an amendment to that licence, which process is regulated by the Civil Aviation Act, 13 of 2009, read with the 2011 Regulations made under that Act. It is noteworthy that although the CAA and DOT are I&AP's, they have not raised any concerns during the EIA process. The same applies for ATNS, the Air

		This remains speculative. The reliance on preliminary Fast-Time Simulation studies is not sufficient to support assertions of independent operations. The International Civil Aviation Organisation, as referred to by the Applicant, essentially requires comprehensive scenario testing, including peak hour air traffic, and consideration of future expansion plans of existing airports, such as CTIA. The lack of such a rigorous analysis is concerning, given the feasibility of safely integrating the CWA Expansion Project into the existing airspace structure. The current ANSP has confirmed in several meetings where representatives of CWA were present that the impact on airspace in terms of safety and efficiency can only be finally confirmed once the detailed airspace design has been concluded, which includes arrivals and departure procedures for existing and future runways for both CTIA and CWA. This assessment must be a condition for the future development of CWA, where existing and future developments in line with the approved master plan (most notably the second runway) at CTIA are not compromised. 5.2. Given these concerns, it is important that a comprehensive airspace management plan be developed, including detailed simulations and stakeholder input from all relevant stakeholders, including CTIA and the South African Civil Aviation Authority ("SACAA"). Such a plan should address potential operational conflicts, ensure compliance with international safety standards, and provide a clear framework for the integration of CWA (if approved) into the existing airspace infrastructure. Without this, the proposed CWA Expansion Project poses unacceptable risks to the safety and efficiency of air traffic operations in the region.	Traffic and Navigation Services SOC Ltd, mandated and responsible for ensuring safe, expeditious and efficient air traffic solutions throughout South Africa and a large part of the Southern Indian and Atlantic Oceans, comprising approximately 10% of the world's airspace. Regulation 139 sets out the requirements of an application for an amendment to an aerodrome licence. These include: a) an aerodrome manual referred to in regulation 139.02.11 for aerodrome licence with a Category 4 and higher; b) plans of an aerodrome; c) written approval from the local government concerned; d) an environmental impact report, if required in terms of the National Environmental Management Act, 1998, 107 of 1998; e) written approval from all relevant government institutions listed in Document SA CATS 139; 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; g) particulars of non-compliance with, or deviations from- i. appropriate aerodrome design, operation or equipment standards prescribed in this Part; or ii. appropriate airspace classification requirements prescribed in Part 172; and h) appropriate fee as prescribed in Part 187. As is evident, the technical details of airspace safety will be considered by the CAA, which is best qualified to assess that. ACSA will have an opportunity to comment to the CAA as the competent authority on that application to advance any technical arguments that it may have. It should also be remembered that CWA is staffed by senior people with extensive experience in operating safe and efficient operations, many who

			held senior positions at ACSA. There is no reason to believe that those people would act irresponsible regarding airspace and operational safety. <u>Technical Considerations:</u> Furthermore, the planned integration of CWA poses no structural or systemic risk to the safety or efficiency of air navigation in the region. This conclusion is backed by modelling, expert review and regulatory engagement. Technical Evidence Outweighs Speculative Concerns: ACSA's comment relies on unfounded assumptions and mischaracterises the evidence presented in support of the proposed development. The concern raised about operational conflict, congestion and safety within the Cape Town terminal airspace is refuted by objective data and validated technical processes. The Fast-Time Simulation (FTS) conducted as part of the airspace planning process for CWA was based on the traffic projections included in the CWA traffic forecasts and modelled against realistic peak scenarios. The simulation outcomes provide verifiable, quantified evidence that simultaneous operations at CWA and CTIA are both feasible and safe, without compromise to airspace efficiency or existing operations. ICAO-Aligned Methodology and Regulatory Compliance: The use of FTS in airspace and procedure design is standard international practice, aligned with ICAO Document 9971 and endorsed by regulators and ANSPs worldwide. The simulations form part of a comprehensive airspace planning approach that includes: The use of FTS in airspace and procedure design is standard international practice, aligned with ICAO Document 9971 and endorsed by regulators and ANSPs worldwide. As indicated previously, the simulations form part of a comprehensive airspace planning approach that includes: • A validated Concept of Operations (ConOps) • Instrument Flight Procedure (IFP) design and validation • Stakeholder engagement; and • Environmental and regulatory approvals governed by the South African Civil Aviation Authority (SACAA) under Part 173.

			Assertions that FTS is insufficient are technically inaccurate and ignore global norms in airspace design and capacity planning. ATNS Involvement Confirms Safety and Feasibility: The Air Traffic and Navigation Services (ATNS), South Africa's Air Navigation Service Provider, was formally part of the development team for the CWA Concept of Operations. At no point during the development or review of the ConOps did ATNS raise any objections or concerns regarding the integration of CWA operations into the regional airspace. ATNS, as the only authority responsible for the safe and efficient management of South African controlled airspace, has full insight into traffic flows, separation standards, sector capacity and ATM architecture. Their active involvement and lack of objection serves as strong, authoritative support for the feasibility and safety of the CWA plans. The position of ATNS therefore reinforces the expert view as reflected in the simulation outcomes and procedure planning that CWA can be safely integrated alongside CTIA. Attempting to undermine the credibility of formal simulations and operational assessments conducted with the air navigation service provider (ANSP) and in line with ICAO protocols is both misleading and inappropriate. CTIA and CWA Can Safely Coexist: The airspace surrounding Cape Town is already a multi-user environment that supports general aviation, scheduled commercial flights and military operations. The simulations conducted confirm the ability of the TMA to support concurrent operations, including: • Separation assurance under all forecasted conditions • Capacity balancing between CTIA and CWA; and • Procedural compatibility with existing SID/STAR networks. Structured Integration and Oversight: CWA is being developed through a methodical, phased process consistent with national and international best practice: • The Concept of Operations was developed in collaboration with ATNS • IFP development and validation are underway, aligned with Part 173 and Part 97 processes This approach demonstrates a commitment to safe and scalable development.

			Conclusion: The Fast-Time Simulation results are based on CWA's forecasted traffic and the direct participation of ATNS and the ongoing regulatory oversight by SACAA, coupled with the professional work done by qualified airspace specialists, confirms that the integration of CWA into the Western Cape airspace system is both technically viable and operationally safe. <u>Fast-Time Simulation is recognised as a critical and widely accepted methodology</u> The assertion that the reliance on preliminary Fast-Time Simulation (FTS) studies is speculative and insufficient to support claims of independent operations does not reflect international best practice or current industry standards. In fact, Fast-Time Simulation is recognised as a critical and widely accepted methodology in early-stage airspace design and development. ICAO Doc 9882 (Manual on Airspace Planning Methodology for the Determination of Separation Minima), specifically in section 5.2, endorses the use of FTS as an essential tool for evaluating the feasibility of airspace concepts, including the identification of potential conflicts, assessment of capacity, and support for separation standards under various traffic scenarios. The simulation conducted in this case aligns precisely with the intent and guidance provided by ICAO 9882. It provides a structured and data-driven environment to assess traffic flows, evaluate potential interactions between Cape Winelands Airport (CWA) and Cape Town International Airport (CTIA), and confirm that proposed concept flight paths do not pose any structural or procedural conflicts. Moreover, the FTS explicitly included peak-hour scenarios and has been calibrated to visualise traffic interactions using real-world and projected flight schedules, ensuring that both current and future growth considerations are factored into the results. Furthermore, the FTS offers a transparent and replicable methodology that serves as the industry benchmark at this stage of airspace development. It is not speculative; rather, it is a foundational step in ICAO's recommended phased approach to airspace change proposals, preceding live trials or real-time simulations.

		6. CONCERNS REGARDING POTENTIAL IMPACT ON FUEL ACCESS AND SUFFICIENCY 6.1. CTIA operates under major fuel supply limitations as it is remotely located from the national fuel pipeline network. CTIA faces persistent operational and logistical problems because it almost exclusively relies on road tanker deliveries for its fuel requirements. The proposed CWA Expansion Project creates substantial concerns regarding the already constrained supply chain infrastructure. CWA claims that its proximity to CTIA enables better fuel planning as flights need less reserve fuel. Whilst this appears advantageous to CWA, it also means that CTIA will be restricted in its fuel supply sources. The Draft EIA fails to properly evaluate or resolve fuel competition risks between the airports and does not analyse how extending the fuel delivery network affects CTIA and the Western Cape region in its entirety. 6.2. The failure to include this assessment remains crucial as the Draft EIA disregards how the new commercial airport could affect fuel delivery stability and create higher operational costs and additional disruptions during busy periods for CTIA. The CWA Expansion Project creates unavoidable risks to critical regional aviation supply security, as there is no defined strategy or infrastructure plan to handle shared fuel supply logistics.	CWA response: 6.1-6.2 CWA remains dedicated to ensuring our development enhances the region's aviation infrastructure without compromising existing operations and we are confident that it will demonstrate our commitment to not only securing CWA's fuel needs but also contributing positively to the region's overall fuel supply stability, growing supply capability and increasing aviation fuel supply chain competitiveness. Addressing Supply Chain Concerns: We understand that CTIA currently faces challenges with the continuity of Jet A-1 fuel supply, given its reliance on a single refinery in Cape Town. Alternative Supply Sources: CWA is actively exploring and securing multiple supply agreements with various suppliers, both locally and internationally. These agreements are intended to diversify our fuel sources, thereby reducing the dependency on any single refinery or supply chain. This diversification strategy is central to our plan to enhance the overall resilience of the regional fuel supply network and to open up new supply chain opportunities which will enhance competition in the region. Storage Capacity and Buffer Stock: The storage facilities at CWA are being designed not only to meet our operational needs but ultimately also to contribute to the region's overall fuel storage capacity. By increasing the storage infrastructure, we ultimately aim to create additional buffer stock that can be utilised, including by CTIA, in case of any disruptions in the supply chain, thereby ensuring that there is an increase in available stock. Supply Chain Management: We are aware of the complexities involved in splitting the supply chain between two significant airports. To mitigate this, we are implementing advanced supply chain management strategies to ensure that fuel demand is met efficiently without placing undue strain on the current single refinery in Cape Town and associated logistics operations. Collaborative Approach: CWA is committed to working with CTIA, ACSA and other stakeholders to align our fuel supply strategies as far as possible, within

			the ambit of the law. We believe that through collaboration, we can enhance the region's fuel security and address any potential challenges proactively to the benefit of all players.
		7. LEGALLY DEFICIENT DRAFT EIA	
		7.1. The Draft EIA does not evaluate the cumulative impacts of the CWA Project Expansion on the regional infrastructure, with particular reference to the closeness and interaction with CTIA. Although specialist studies on the "combined operations" of CTIA and CWA are included in Appendix 21 of the Draft EIA, it does not provide a detailed cumulative impact analysis on the investment in infrastructure, air traffic management in the region, or economic competition. This omission is significant in light of Appendix I(2)(d) of the EIA Regulations, which explicitly requires the assessment of potential cumulative impacts.	EAP response: All cumulative impacts for the proposed project are assessed by specialists and concluded by the EAP. These are included in specialist reports and in the amended draft EIAR. Appendix 1 (2) (d) refers to requirements in terms of Basic Assessment reports. The process applicable to this project is Scoping and EIA and not Basic Assessment (due to the trigger of Listing Notice 2 listed activities by the proposed project scope. The TIA, land use planning reports (Appendix 24 and Appendix 36 of the EIAR), together with the Bulk Engineering report (Appendix 37) and Electrical Engineering report (Appendix 38) consider and address infrastructure impacts and needs. Air traffic management in the region is addressed through the TSAM simulation study (Appendix 21) and the CONOPS (Appendix 18). CWA response: These items have been comprehensively responded to during all four rounds of the PPP, via the C&R report and included the draft EIAR. Please also refer to sections 2.2, 2.3, 3.2 and 5.1 above as it relates to matters of competition and infrastructure investment. <u>Response to “does not provide a detailed cumulative impact analysis on air traffic management in the region”</u> While it is acknowledged that Appendix 21 of the Draft EIA includes specialist studies on the “combined operations” of CTIA and CWA, the assertion that it

			fails to provide a detailed cumulative impact analysis on air traffic management in the region is unfounded. Appendix 21, supported by subsequent simulation outputs and technical assessments, provides a robust review of integrated operations between CTIA and CWA. These studies demonstrate that the forecasted traffic volumes at CWA—based on a conservative and staged growth model—can be accommodated within the existing and planned airspace structure. Furthermore, the proposed Air Traffic Management (ATM) solutions are designed to operate fully within the declared capacity of the regional airspace system. The cumulative impact has been appropriately considered by evaluating simultaneous operations, route structure compatibility, conflict risk and sector capacity. Importantly, simulations and modelling exercises, such as the fast-time simulation referenced in the appendix, confirm that projected operations at CWA will not degrade safety or efficiency within the Cape Town Terminal Manoeuvring Area. It must also be emphasised that any future changes in operations will remain subject to oversight by the South African Civil Aviation Authority (SACAA), which governs the allocation of airspace resources based on capacity and safety considerations. In this context, the introduction of CWA operations has been structured specifically to support manageable integration and sustainable growth. In conclusion, both the traffic forecast and ATM strategies for CWA have been developed in a way that ensures they remain within the existing airspace system's declared capacity, with no material negative cumulative impact on regional air traffic management. <u>A perspective on growth projections and rising demand</u> As stated in section 2.2 above: CTIA currently processes 10 million passengers per annum (MPPA). It is our understanding that ACSA conducted an independent air traffic forecast for CTIA and ACSA confirmed that their air traffic forecast for

			scheduled commercial annual passenger volumes for 2050 is 23,6 MPPA into the Cape Town region, where CTIA is the sole beneficiary of this growth. This is in keeping with the independent traffic forecast conducted for CWA, which indicates that an aggregate commercial passenger traffic to the Cape Town region is expected to increase to 22,6 MPPA by 2050, where CWA is the beneficiary of 5,2 MPPA of that growth. Both forecasts indicate growth into the region, highlighting the prospects of unlocking new tourism opportunities, the presence of underlying market demand and demonstrating that there is rising demand. Growth forecasts confirm that the region's air travel capacity has not yet met its full demand potential, underscoring that saturation is not a limiting factor. ACSA's point of contention is that ACSA should be the sole beneficiary of this growth. CWA disagrees with this position.
		7.2. The Draft EIA also has inadequate and incomplete information regarding CTIAs current and planned infrastructure, particularly the fact that CTIA has plans for a second parallel runway. Further, the Draft EIA ignores CTIA's already approved expansion plans, which include a runway realignment and terminal expansion, which will Increase the capacity of CTIA. The Applicants contention that the CWA Expansion Airport is a necessary "reliever airport" is incorrect, given that CTIA does not, at this stage, require any relief as it has enough existing and expandable capacity. This contradiction challenges the core argument of the need and desirability of the CWA Expansion Project, as detailed above.	EAP response: Based on a comment received from the IAP during the Pre-Application Scoping Phase relating to the omission of the CTIA realigned runway and for recognition of the CTIA future second parallel runway; the relevant specialist study was amended to consider the realigned runway and the second parallel runway was not included (Refer Table 136 in the amended draft EIAR). Reasoning was provided in the C&R (Appendix 29A). No unauthorised expansion plans can be considered at this stage. The evidence in support of the reliever airport concept is provided in Section 5 of the amended draft EIAR, and based on historical evidence, specialist studies and sound business principles. It is by no means the core argument for the need and desirability section, but a contributing factor both economically and sustainability. CWA response: Please refer to section 2.2, where the foundational elements driving the justification for CWA and the airport's strategic importance are reaffirmed.

			As stated in 2.3 above: Throughout the public participation process, ACSA has relied on its Development Plans and Master Plan as grounds of its Objection. In summary, the Development Plans make provision for ACSA's activities up to 2050 with a capacity of 23,6 million passengers per annum (MMPA), while the Master Plan makes provision for ACSA's activities until it reaches a capacity of 45 million passengers per annum (MPPA), 40 to 50 years from now. ACSA's comments during the public participation process are predicated on the idea that ACSA is entitled to all of the growth in the aviation sector in the Western Cape. It is respectfully pointed out that, as a responsible company, discharging its obligations to manage Company Airports, in developing its Master Plan, ACSA is simply planning for the future, as any other responsible company would do. However, ACSA's Master Plan has no statutory status; is not binding on third parties or organs of state; and therefore no more weight should be given to ACSA's Master Plan, than the strategic plan of any other I&AP. If ACSA has failed to take into account the possibility that another airport may legitimately compete for a part of the aviation sector's business in the Western Cape, the Master Plan may have to be revised, as it would for any other change in the operating environment. That is the nature of a strategic plan. Similarly, Development Plans are not static plans. These plans are subject to periodic reviews to ensure that plans are informed by shifting market conditions. This is in keeping with Infrastructure Development Life Cycle best practices and IATA and ICAO endorsed approaches which promote demand-responsive, adaptable and cost-effective infrastructure planning. Please refer to section 3.2. <u>Additional Considerations</u> ACSA also relies for its Objection on its plan to realign its existing runway. The right to realign the existing runway is contained in an environmental authorisation ("ACSA's EA") that was granted by the eight years ago on 23 May 2017 (under reference 14/12/16/3/3/2/446). ACSA's EA was initially granted for a period of five years; its validity was extended for a further 5 years and will lapse on 23 May 2027. It was made clear by the Department of Forestry Fisheries and the Environment when granting the extension that no further

			extensions will be granted (because the receiving environment may have changed significantly from when ACSA's EA was granted). It is public knowledge that the receiving environment has changed significantly since the original authorisation was granted on 23 May 2017. The planned area of development has experienced large scale invasion and sprawling of informal settlements including the surrounding areas i.e. the runway approach on the northern side of the planned new realigned runway which has material implications for aviation safety. Data on WinDeed.Lexis also suggests that other than the problem with vacant occupation, unresolved issues remain in terms of ownership and rezoning of the land. What is not clear is to what extent the abovementioned might represent substantial and significant changes in the baseline conditions at the time of the original authorisation granted in 2017. Should those changes be deemed as substantial and significant by the competent authority, it would be difficult for the DFFE to justify extending the validity of that environmental authorisation before it lapses in 2027. Those changes to the receiving environment may also justify its revocation now. If the environmental authorisation is to be amended, there will be a need for a new public consultation process. It therefore follows that ACSA may not implement its Proposed Expansion; these potential risk factors again highlight the important role that CWA will fulfil as a reliever and alternative airport to ensure continued and unfettered air access into region and the City of Cape Town. The reason for ACSA's failure to implement its Proposed Expansion is not explained, but ACSA's right to build it cannot translate to DEA&DP's obligation to sterilise any development which ACSA regards as a threat while that right remains valid. It is possible that ACSA may choose never to implement the right to implement its Proposed Expansion. If DEA&DP were to refuse to authorise any development objected to by any other I&AP (and so prevent fair competition), that would be an overreach of DEA&DP's powers, which would expose it to an appeal or review of its decision. DEA&DP's remit is a consideration of bio-physical and socio-economic impacts; it cannot properly protect ACSA from legitimate competition.
		7.3. In response to ACSA's previous comments on the Draft EIA, the EAP provided that: 'With regard to the second parallel runway — the development of an additional runway cannot be seen as a cumulative impact. The definition of	EAP response: the EAP stands by the statement.

		"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'. The argument that CTIA's proposed second parallel runway is an activity and not an impact in terms of NEMA is flawed. Although the second runway is an activity, the construction and operation thereof, will have an environmental impact, which must be assessed. Further, as this runway is not standalone but supplementary to the first (realigned) runway, which constitutes a phased project, the cumulative impact will need to be considered as part of the EIA process.	No NEMA authorised second parallel runway exists at this stage, and the EAP cannot be required to assess IAP planning based on no tangible evidence of CTIA owning this right. CWA response: Please refer to section 7.2.
		7.4. Notably, no independent, peer-reviewed market demand study has been included in the Draft EIA to support the economic case for the second commercial airport. The only demand projections come from consultants allied to the Applicant's developer, with projected numbers that do not demonstrate how they relate to national aviation trends or the Department of Transport's forecasts. This is an apparent contravention of Appendix I(2)(f) of the EIA Regulations, which calls for a justified opinion on the need, desirability, and feasibility of the proposed development.	EAP response: All specialists who provided input in the form of independent studies are objective and independent. No peer-reviewed market demand study is required by the EIA Regulations unless stipulated by the CA. The applicability of Appendix 1 of NEMA and Section 5 of the amended draft EIAR has been addressed above. Response from socio-economic specialist: A market study falls outside the scope of the specialist's requirements for the preparation of a socio-economic impact assessment. The passenger traffic forecast study was assessed by Netherlands Airport Consultants (NACO) (Appendix 18) in terms of passenger demand and long-term market growth. This information is quoted as part of assessing the feasibility of the CWA airport and is considered credible, as it was prepared by a renowned airport consultant in the field. CWA response: <u>CTIA and CWA present mutually reinforcing forecasts</u> As stated in section 2.2 above: CTIA currently processes 10 million passengers per annum (MPPA).

			It is our understanding that ACSA conducted an independent air traffic forecast for CTIA and ACSA confirmed that their air traffic forecast for scheduled commercial annual passenger volumes for 2050 is 23,6 MPPA into the Cape Town region, where CTIA is the sole beneficiary of this growth. This is in keeping with the independent traffic forecast conducted for CWA, which indicates that an aggregate commercial passenger traffic to the Cape Town region is expected to increase to 22,6 MPPA by 2050, where CWA is the beneficiary of 5,2 MPPA of that growth. Both forecasts project regional growth, reinforcing the presence of strong market demand. ACSA's point of contention is that ACSA should be the sole beneficiary of this growth. CWA disagrees with this position.
		7.5. The Draft EIA's airspace capacity and safety assessments are based on the Concept of Operations and Airspace Capacity Study (Appendices 18 and 20), which are conceptual and theoretical. The studies do not model real-time operations under peak conditions or offer confirmed flight path separation or conflict resolution models. CTIA's flight corridors and the well-known challenges of managing parallel airports within a 22-kilometre radius of each other, call for much more thorough and substantiated airspace modelling than what is offered in the Draft EIA. SACAA's "no objection" is made without important conditions or outstanding approvals and, therefore, cannot be taken as conclusive.	CWA response: This has been addressed. Please refer to section 5.
		7.6. The Draft EIA does not present a clear link to other important spatial and aviation development plans, including the Western Cape Spatial Development Framework and the National Airports Development Plan ("NADP"). While Appendix 36 of the Draft EIA seeks to address planning policy consistency, it fails to discuss the NADP's priority node structure that identifies CTIA as the strategic hub for the region. There is no evidence that CWA has been identified in any statutory planning document for development into a secondary commercial airport.	Response from town planner: The NADP is discussed in the CWA-draft-EIAR-18-March25 pages 86 and 386 to 390. Appendix 16-CWA-Civil-Aviation-Baseline-and-Site-Sensitivity-web, in Section 3.4.1. sets out clearly that: <i>"The proposed upgrade and expansion of CWA is being developed on a purely commercial basis, without government funding, on the principle of financial sustainability and viability. In this regard it aligns with the Policy Statement 15 in the White Paper on Civil Aviation Policy (2017). Moreover, as an upgrade of</i>

			<i>an existing airport it aligns with the preference expressed in the NADP (2015) for “the upgrading of existing airports over development of green-field airports.” By proactively reaching out to the authorities responsible for land-use developments, spatial planning and local economic planning in the vicinity of the airport, CWA supports the integration of the airport in its environment.</i> <i>The NADP (2015), the NATMAP (2016) and the White Paper on Civil Aviation Policy (2017) support this approach by highlighting the concept of “airport cities” and “aerotropolises”. Through its focus on commercial property development principles and integration into the so-called “landside” infrastructure, CWA embraces this concept. CWA is a private enterprise that, through the proposed development, aims to increase the options available to both GA and commercial aviation operators and users, and to serve the needs of its customers. This approach is fully in line with the NTP (2021) strategic objectives of supporting tourism and trade through the application of free market principles.”</i> AND <i>“4.1 Site alternatives</i> <i>Cape Winelands Airport purchased the former Fisantekraal aerodrome in 2020 with the explicit intention of developing it and growing aviation activity at the site. It is a licensed and active aerodrome with functioning infrastructure and facilities in place. In theory, it could be envisaged that the proposed development at CWA were to take place at an alternative location. However, it is not considered reasonable or feasible for the owner of CWA to purchase another site to pursue this development. Moreover, it should be noted that the NADP (2015) clearly expresses a preference of “upgrading existing airports” over the development of “green-field” facilities.”</i> Appendix 23 – CWA Socio-Economic Impact Assessment makes extensive reference to the NADP and situates CWA within its broader context. It seems this I&AP is under the impression that statutory approval must have been granted or identified first, before initiating an application with public participation, which is not the case.

		7.7. These deficiencies are obvious non-compliances with Appendix 1 of the EIA Regulations, which requires detailed and proper descriptions of the justification for the proposed activity, the justification for the choice of the proposed activity, comparison of all feasible alternatives, and description of assumptions, uncertainties, and knowledge gaps. The Draft EIA presents the preferred alternative (Alternative 4) as if it were a fait accompli, assuming market demand and regulatory acceptance, with no evidence to support the assumption. As such, the Draft EIA fails to provide sufficient legal and procedural standards for making informed decisions.	EAP response: The applicability of Appendix 1 and the content and requirements of Section 5 in the amended draft EIAR has been addressed above. The development of the preferred Alternative 4 relied on inputs from IAPs, Stakeholders, specialists and technical design personnel. The development and listing of Alternatives occurs largely within the Scoping Phase, with further Alternative development within the EIA Phase as informed by IAP input and specialist assessment. The reasoning for the selection, development and assessment of Alternatives is provided in Section 8 of the amended draft EIAR. Assessment of alternatives were 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 at an existing airport. The No Go Alternative was also assessed.
		8. CONCLUSION	-
		8.1. The proposed CWA Expansion Project lacks justification because it does not align with current infrastructure, regional development goals or national aviation policies. A second commercial airport near CTIA lacks justification as the existing commercial airport maintains ample capacity to meet Western Cape aviation and tourism requirements. The projected socio-economic advantages of the CWA Expansion Project remain theoretical as they lack concrete evidence and fail to evaluate the possible material adverse impacts on CTIA and surrounding businesses, as well as regional employment, fuel access and infrastructure. The Draft EIA fails to conduct necessary cumulative impact evaluations whilst using outdated assumptions that support developer interests and ignores key stakeholder positions, particularly that of CTIA, as the designated aviation hub according to national and provincial planning frameworks.	EAP response: this comment is a duplication and has been addressed.

		8.2. The proposed CWA Expansion Project creates unresolved safety issues for airspace operations, and the proposed mitigation measures lack testing and fail to provide sufficient solutions. In our view, the Applicant has failed to show that the development follows sustainable development principles, as defined in NEMA.	EAP response: this comment is a duplication and has been addressed.
		8.3. We recommend that the Applicant and the EAP conduct a revised EIA process should they wish to proceed with the CWA Expansion Project. It is advisable that the Applicant complies with all legal requirements and includes in its EIA process, independent assessments, and meaningful stakeholder engagements, including engagements with CTIA.	EAP response: no revised EIA process is required, based on responses provided to the comments raised by this IAP.
		9. ACSA appreciates the opportunity to comment on the proposed CWA Expansion Project, and trusts that these comments will be addressed in the EIA.	EAP response: Noted
413	Barbara Gale	Email dated 13 May 2025: Thank you for the notification of the Proposed Expansion of Cape Winelands Airport - Amended In Process draft EIAR for Public Participation (DEA&DP ref: 16/3/3/2/A5/20/2046/24). Unfortunately I have not been able to Review the large volume of documents (Main report plus Appendices). Thank you for the opportunity of a one on one discussion at the Open Day on 15 April 2025. I will limit my comments below to Responses to my previous comments during the first phase of PPP, as given in App29C pages 48-56. (I have also attached the relevant pages from the CRR, with annotated comments/responses in purple) <i>[Please refer to Appendix F (C413) of this C&R Report]</i>	Email response provided 14 May 2025: Thank you for the email and comments submitted
		Comments submitted 19 November 2024: 1. 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 An extension was granted to 13 January 2025, taking into account the compulsory break from 15 December to 5 January, this was an effective 8 day extension. The	EAP response: The extension for commenting was granted to the IAP.

	response was "The request for a public meeting will be considered". BUT, another Open Day was provided? See further comments below.	
	2. 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: "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." 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 1 'YES', requiring a more extensive public participation process, not 'No' requiring that Minimum requirements be met. The response to this was "The comments are noted". BUT the Guidelines were still not followed. A Public Meeting (not an Open Day) with Translators for English, Afrikaans and isiXhosa, where the documents can be explained, questions asked & minutes circulated, is called for in the Guidelines - minimum requirements are insufficient, owing to the size of project and multitude & diversity of affected communities.	EAP response: The Public Participation Guideline in terms of NEMA 1998 Environmental Impact Assessment Regulations (2017) was considered during the Scoping and EIA Phases. Further consultation with DEA&DP and comments from IAPs gave rise to additional public participation measures implemented during the process. The IAP must please note that a guideline is not similar to a regulation and is a tool to develop the PPP plan. The summary of PPP is provided in Appendix 40 to the EIAR which forms part of all consultation with stakeholders.
	3. 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. The response was that "The Open Day Format was chosen", this is not in accordance with the Guidelines and stated above.	EAP response: A public meeting was held on 8 May 2024, an open day on 20 November 2024, and another open day was held on 15 April 2025. The comments raised during the public meeting were recorded. The format for the 2 Open Days during the EIA Phase was chosen specifically to allow IAPs to interact with specialists to gain a better understanding of the proposed project and associated impacts, and then to provide comment to the EAP after the Open day. No comments

			were recorded during the day as it was an open forum with free interaction between IAPs and specialists. The above is in addition to the extensive PPP conducted to date for the proposed project, as detailed in Appendix 40.
		4. The JCF [actually Susan Rheeder of the Pearly Trust but who is a member of the JCF EXCO] 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. Response was that 'the EAP would consider application for extension of timeframes, if there is new information to be shared with I&APs'. This was done, thank you.	EAP response: Note the 50-day extension is only granted by DEA&D if new information is to be shared with IAPs and not to allow IAPs extended commenting periods.
		5. 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 of whether the meetings were conducted in English or Afrikaans, and if other translation facilities were available. The JCF have 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	EAP response: The EIA notices were also in English, Afrikaans and isiXhosa. The public meeting and the open days had access to an isiXhosa translator, and English and Afrikaans were both used to present and discuss and clarify comments or concerns raised.

		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. The response to this was that "Executive Summaries in Afrikaans or isiXhosa, can be made available on request". Executive Summaries for the Amended EIAR were provided in English, Afrikaans and isiXhosa, But owing to the Open Day Format, the documents could not be explained to the community in all three languages. This remains a major problem for the process.	The Executive summaries were provided in all three languages. The format of the open day did not require the explanation of the executive summary to any IAP, but would there have been a request, the facility was available on the day.
		Comment submitted 28 November 2024: 6. Regarding a question as to whether or not the extension granted would apply to all I&APs, the response was 'Extension is granted on an individual case by case basis. I think this is against the regulations, all I&APs should be given an equal amount of time to comment.	EAP response: The allowance of extension to submit comments is at the discretion of the EAP. IAPs that requested extension were all given additional time. There is no regulatory requirement that should one IAP request extension, then a blanket extension should be granted to all IAPs.
		Comments submitted 13 January 2025. 7. 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	Response from ITS: Any new development in the City of Cape Town aligns itself with the City's Right-of Way (ROW) Road Network Plan. This plan forms part of the City's Comprehensive Integrated Transport Plan (CITP) which finds its structure within the Integrated Development Plan (IDP) of the City. All these documents have approval status in the City and any development needs to show how it aligns with these. We are aware of the EIA of the Lucullus extension which is a project independently from the CWA. The TIA for the airport does not rely on this link as, correctly stated, it will have good access also from the R304 and the future R300. However, the airport must also align itself and accommodate such link, if this would realise in future in accordance with the CCT ROW Plan.

	Wellington/Klipheuwel/Okavango Road and the proposed extension of the R300. Please note that this is confirmed by the Blaauwberg DSDf vol 3, page 7 (attached) <i>[Please refer to Appendix F (C413) of this C&R Report]</i>. The response to this was that 'The Lucullus Road extension is not a requirement to accommodate the airport's first phase, was only assessed for when the airport is fully developed, but airport traffic is likely to use the R304 and R300 to connect to the N1'. It is requested that Lucullus Rd Extension be excluded from the access routes as a condition of approval. Page 632 of the Amended draft EIAR states that Option 3: Access via Lucullus Rd extension is the preferred initial route, This must be removed.	
	8. 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. The Response was that 'the time of the field assessments were considered acceptable. An additional field assessment was done in April 2024'. As a qualified Freshwater Biologist, field assessments in summer and early autumn before the winter rains are not true representations and a wet season assessment should still be done.	Response from FEN: Your comment is acknowledged. However, as previously commented, the site conditions at the time of the three field assessments were considered acceptable to reach appropriate conclusions with an acceptable level of accuracy. The condition of the wetlands (being largely to seriously modified with limited ecological importance and sensitivity and ecoservice provision) remained unchanged between the various assessments.
	9. 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 net loss of wetlands, but as it stands there will be a loss of 7.44ha of Wetland Seep. I accept that the wetland offset should be nearby in order to conserve form and function, but it remains a net loss of wetlands if an existing wetland is rehabilitated.	Response from FEN: As previously commented, 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 National Biodiversity 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). Refer to response provided to DWS with regards to the creation of new wetland habitat. Under ideal circumstances, it would have been recommended that the stormwater attenuation ponds associated with the proposed CWA development be designed in such a way to mimic wetlands.

In order to achieve no net loss of wetlands, the rehabilitated wetland offset should be extended (additional wetland created in-situ) by the amount of wetland that will be lost from the development site (7.44ha).

However, this is not a viable option for the CWA as it may be a safety risk in terms of bird strikes. Thus, the stormwater attenuation ponds were specifically designed to be covered to reduce the bird strike risk.

Using the DWS offset calculator, it was determined that to achieve no net loss of the 7.44 ha seep wetland habitat, it is required to offset at least 3.97 habitat Hectare Equivalents (HaE) and 13 HaE of ecosystem conservation which will be achieved through rehabilitation of existing wetland habitat by significantly improving wetland condition. As indicated in the offset report, offsetting only the remainder of the seep wetland (3.68 ha) will not be sufficient to achieve the 3.97 HaE of wetland functionality and 13 HaE ecosystem conservation target, therefore a CVB wetland which is fed by the seep wetland via an agricultural drain was also investigated to achieve the offset target (refer to the table below for offset targets). 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 conservation as indicated in the table below. In addition, to promote ecological connectivity between the seep wetland and CVB wetland, it was recommended that the agricultural drain be rehabilitated. This is seen as an additional conservation action providing further motivation for the rehabilitation of the remaining seep wetland and CVB wetland habitat to meet the offset requirements in terms of HaE.

	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.

		10. 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'. 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." Surely these areas should be development exclusion zones to prevent unmitigable impacts on biodiversity. The Response to this was a) "the required biodiversity offset will not result in an unacceptably high level of botanical loss on this site". Who determines what is acceptable/unacceptable, were site assessments done and in what season? b) regarding the area with high sensitivity for terrestrial fauna (bird species) the response was that "During the site assessment, none of these species were observed on site" and "breeding of these species within this area is unlikely". When was the site assessment, was seasonal distribution considered and were locals consulted? Since these species are rare and endangered, no harm should come to them. c) regarding medium sensitivity species, the response was that "None of these species are expected to occur", but it would appear that no site assessment was done. Again, were locals consulted? A minimum requirement should be a Search and Rescue program included in the EMPr.	a) Response from Botanist: Yes, four site visits were done for the botanical Scoping and IA studies, and the following is quoted from my IA report (pg 3) "The site was initially visited on 7 August 2020, and then again in September 2021 (original study areas only) and March 2022 (additional study areas only), with some areas visited again in June 2024. The first two site visits were within the optimal winter – spring flowering season in this winter rainfall area, and all the likely geophytes were thus evident, and most but perhaps not all the possible annuals were evident and identifiable, whilst all perennial plants were identifiable. The seasonal constraints on the accuracy of the botanical findings were thus minimal. The March 2022 site visit was in the dry season, and thus although there were significant seasonal constraints on species observations, the focus was on habitat integrity, and the seasonal constraints were less important. Numerous perennials were anyway identifiable in the two small areas with natural vegetation during the March site visit, allowing for an accurate assessment of habitat sensitivity." b) Response from SAS: Two site assessments were undertaken, one from the 14th – 16th February 2022 and a second from the 16th – 17th August 2022. Following the assessment of the site and the assimilation of site and background data, it was determined that the verified site sensitivity differed from that of the screening tool, with the verified site sensitivity being listed as low and medium sensitivity. Due to the degraded state of the habitat, the study area was deemed unsuitable for the breeding of such species. It was noted however that some SCC, notably avifauna, may still forage within the study area periodically. Mitigation measures as stipulated in the specialist reports and EIA are to be implemented to ensure that no harm comes to species encountered within the study area. <u>Should any SCC be found to be breeding in the study area at the time of construction activities, all activities are to be halted, and a suitable qualified ecologist/relevant cape nature specialist must be consulted to determine the best way forwards.</u> EAP response: This additional recommendation above (underlined) will be included in the final EIAR and EMPr.

			c) Response from SAS: Two site assessments were undertaken, one from the 14th – 16th February 2022 and a second from the 16th – 17th August 2022. All medium/potentially occurring SCC were considered and have been discussed in both the faunal and avifaunal report. Species with a medium probability of occurrence are not readily expected to occur in the study area, and whilst their known distribution ranges do encompass the study area, the degree of habitat degradation and land uses both within and outside the study area limit the probability that such species will occur therein. <u>Prior to construction activities, a final walk down of the study area should be undertaken to verify the presence/absence of potential SCC.</u> EAP response: This additional recommendation above (underlined) will be included in the final EIAR and EMPr.
		Thank you for the opportunity to comment on the Amended draft EIAR for CWA. Thank you for your kind cooperation in these matters. Please confirm in writing to [REDACTED] that you have received this email.	The EAP confirmed receipt of the comments submitted to the IAP.
414	Celine Oates - Garden Cities	Email dated 13 May 2025: 1. We act on behalf of Garden Cities NPC (RF). We attach hereto our preliminary comment on the Amended Dra Environmental Impact Assessment Report for the proposed expansion of the Cape Winelands Airport, as well as Annexures A-C. Kindly confirm receipt hereof.	Noted
		Letter received via email dated 13 May 2025: RE: PRELIMINARY COMMENT ON THE AMENDED DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED EXPANSION OF THE CAPE WINELANDS AIRPORT (DEA&DP REF. NO.: 16/3/3/2/A5/20/2046/24)	-
		INTRODUCTION	-
		1. These comments are prepared on behalf of Garden Cities NPC (RF) ("Garden Cities") in connection with the amended Draft Environmental Impact	Noted

		Assessment Report ("amended DEIR") for the proposed Expansion of the Cape Winelands Airport ("CWA").	
		2. As a directly affected interested and affected party (I&AP), Garden Cities is situated in close proximity to the proposed CWA site and will bear the brunt of adverse noise impacts. The project will also give rise to other potential unquantified impacts, such as air quality impacts. Garden Cities has a direct and material interest in the project, as Garden Cities stands to be one of the most directly and adversely affected stakeholders.	EAP response: The comment is noted. Potential impacts on adjacent landowners and associated with the proposed project have been identified and assessed, resulting in technical and impact assessment studies, inclusive of noise and air quality. Response from CWA: While Garden Cities (GC) is indeed located near the proposed Cape Winelands Airport (CWA) site and is correctly registered as an Interested and Affected Party (I&AP), the assertion that it will "bear the brunt" of adverse noise and unquantified impacts is overstated and lacks proportionality. The Environmental Impact Assessment (EIA) process, including detailed specialist studies, has explicitly modelled noise and air quality impacts with reference to sensitive receptors, including GC's landholdings. Noise contours show compliance with applicable thresholds under SANS 10103, and mitigation strategies are proposed in the EMP and Noise Mitigation and Management Plan (NMMP). Air quality impacts were assessed using dispersion modelling, with pollutants quantified and benchmarked against national ambient standards. Moreover, GC's interest is acknowledged and respected, but it is not uniquely or disproportionately affected in comparison to other surrounding landowners or communities. The DEIR adopts a balanced, transparent methodology aligned with NEMA, ensuring that all potentially affected parties—including GC—are fairly considered. Assertions of being "one of the most adversely affected stakeholders" must be supported by objective evidence, which the DEIR does not confirm.
		3. It cannot be gainsaid that the residential, commercial and other opportunities in the project area associated with the Greenville Development (which caters for the low, medium and high income population groups in the Western Cape)	EAP response:

		is a highly significant stakeholder and Garden Cities contributions to the City of Cape Town's subsidised housing initiatives should not be undermined by competing land uses which affect or erode the sustainability of our client's continued operations and contribution to the general public at large. The sustainability of Garden Cities' development opportunities and associated contributions to employment and the local economy now stands to be materially and adversely affected by the proposed CWA.	The proposed project is an expansion of an existing airport and not a new activity at this site. Garden Cities is a registered IAP for the proposed project from the onset of the Scoping Phase. Response from CWA: The significance of the Greenville Development and Garden Cities' (GC) contributions to the City of Cape Town's subsidised housing programme is acknowledged. However, the suggestion that the Cape Winelands Airport (CWA) expansion inherently undermines or threatens the sustainability of GC's operations is unsubstantiated and misrepresents the nature of the proposed development. The CWA project is not a competing land use in policy or spatial terms but is strategically aligned with regional development frameworks that promote integrated, multi-nodal growth, including aviation-related infrastructure as a catalyst for employment and economic opportunity. The EIA process has assessed potential impacts—including on residential and mixed-use developments—and proposes mitigation strategies to ensure compatibility. Furthermore, spatial planning is dynamic and involves balancing diverse, sometimes overlapping, land uses. It is not the role of the EIA to favour one long-term land use over another, but to assess whether co-existence is possible under regulated conditions. The DEIR demonstrates that the CWA and Greenville can co-exist through responsible planning, noise buffering, and future land-use coordination. Assertions that the airport expansion "materially and adversely affects" GC's contribution to the local economy are speculative and overlook the long-term regional benefits of complementary infrastructure investment.
		4. Despite previous comments regarding how the project impacts on our client, and specifically the impact on the long-term viability (sustainability) of its residential, commercial and other businesses and related operations, Garden Cities remains deeply concerned that various significant potential negative	EAP response: The comment is noted. All comments received by the EAP have been captured in the C&R and responded to. Where applicable, these responses were provided by technical or specialists and informed the amended draft EIAR.

		impacts have not been appropriately assessed. These omissions are perplexing and inexcusable.	Response from CWA: The assertion that “various significant potential negative impacts have not been appropriately assessed” is neither accurate nor fair. The Draft Environmental Impact Assessment Report (DEIR) includes comprehensive specialist studies on noise, air quality, biodiversity, socio-economic impacts, aviation safety, heritage, hydrology, and traffic—among others. Each of these was conducted in line with NEMA and EIA Regulations, using accepted methodologies and incorporating public comment. Garden Cities' concerns have been explicitly acknowledged and addressed in both the Comments and Responses Report. Statements that omissions are “perplexing and inexcusable” are emotive and overlook the iterative, evidence-based nature of the EIA process. Where residual risks remain, they are transparently disclosed, evaluated for significance, and addressed through proposed mitigation or management strategies. In short, the DEIR does not dismiss or downplay GC’s concerns but responds to them in accordance with environmental legislation and best practice. The project has evolved specifically to accommodate stakeholder input, including changes to preferred alternatives and layout adjustments.
		5. These comments highlight several shortcomings of the amended DEIR and the specialist studies. These issues and concerns are described in more detail below in these comments which must read and responded to independently with the following Annexures forming part of these comments: 5.1. ANNEXURE A: Morris Environmental and Groundwater Alliances (MEGA) Review dated May 2025. 5.2. ANNEXURE B: Sound Research Laboratories South Africa Review dated 20 March 2025. 5.3. ANNEXURE C: Sound Research Laboratories South Africa Review dated 10 April 2025.	EAP response: To be addressed in sections where detail is provided by IAP. The Annexures listed have been drawn into this report and responses provided by technical input or specialists as appropriate.

		SUMMARY OF KEY ISSUES AND CONCERNS	-
		6. The impact assessment component of the environmental impact assessment (EIA) process involves the identification of impacts followed by an assessment of those impacts in terms of significance. The selection of criteria used to assess significance is critical. Among others, consideration needs to be given to the sensitivity of environmental attributes; relevant policies, plans and strategies; key concerns and inputs from interested and affected parties (I&APs); any applicable thresholds, limits of acceptable change and environmental related standards; mitigation measures and the likely effectiveness thereof, as well as any gaps and limitations in information and knowledge. Two key principles that need to be borne in mind are the precautionary principle and the mitigation hierarchy.	EAP response: The list of considerations provided by the IAP is not exhaustive. The two key principles mentioned - the precautionary principle and the mitigation hierarchy – are noted and form part of the Scoping and EIA process to date. The assessment of impacts by the EAP or relevant specialists are indicated per specialist report and in Section 8.1.3 of the amended draft EIAR. Response from CWA: The statement reiterates standard principles of Environmental Impact Assessment (EIA) practice, all of which have been adhered to in the amended Draft Environmental Impact Assessment Report (DEIR) for the Cape Winelands Airport (CWA). The significance criteria applied in the DEIR explicitly incorporate the sensitivity of receptors, relevant planning frameworks (including the MSDf and regional SDFs), stakeholder input, applicable standards (e.g. SANS 10103, SANS 10117, NAAQS), and the mitigation hierarchy. The precautionary principle has been applied in scenarios where data gaps exist, including the use of conservative assumptions and upper-bound impact modelling (e.g. full operational capacity in noise and air quality assessments). The DEIR is clear about information limitations where they occur and transparently addresses them through post-authorisation management plans such as the EMPr and Noise Mitigation and Management Plan (NMMP). The assessment approach is fully aligned with the requirements of NEMA, the EIA Regulations, and current best practice guidance.
		7. Crucial to the EIA process is whether (i) adequate comprehensive information has been provided in a clear and easy-to-follow manner; (ii) whether the level of concern from I&APs and questions raised by I&APs have been adequately	EAP response: The items listed as crucial to the EIA process is noted. Adequate comprehensive information on the proposed project, specialist assessment

		addressed; (iii) whether the process for determining significance is logical and rigorous; and (iv) whether the mitigation hierarchy has been applied.	and technical input has been provided in the amended draft EIAR and appendices. Concerns raised by IAPs are not rated on a level basis and all enjoy equal importance. The concerns are all captured in the C&R and responded to in full. Determination of significance of impacts is by specialists appointed to a specific field and by the EAP and is conveyed in a logical manner to the reader of any specialist document. Impact assessment follows a certain methodology, which is also explained to the reader. The mitigation hierarchy has been applied to the proposed project. Response from CWA: The Draft Environmental Impact Assessment Report (DEIR) fully meets the four criteria outlined in this comment: i) Clarity and Accessibility: The DEIR is structured in accordance with the EIA Regulations and supported by clearly defined specialist studies, executive summaries, diagrams, and mapping to enhance readability and understanding. ii) Engagement with I&APs: Extensive public participation was conducted in accordance with legal requirements, with all I&AP comments—including those from Garden Cities—documented and responded to in the Comments and Responses Report. Numerous meetings, correspondence, and follow-ups have further demonstrated a proactive approach to stakeholder engagement. iii) Significance Determination: The process for determining impact significance is methodical, drawing from established methodologies that consider nature, extent, duration, intensity, probability, reversibility, and cumulative effects. These are applied consistently across all environmental themes. iv) Mitigation Hierarchy: The mitigation hierarchy is clearly applied throughout the DEIR, with avoidance, minimisation, mitigation, and management measures integrated at both planning and operational levels. Where certain impacts cannot be avoided (e.g., noise in specific zones), these are acknowledged and accompanied by specific mitigation strategies, including post-approval management tools.

			The implication that these elements have not been applied is inaccurate and does not reflect the documented scope and depth of the EIA process.
		8. As will be detailed in the body of these comments, the amended DEIR is deficient in the following respects:	-
		8.1. Despite noise relating to aviation activities being internationally established as a major environmental concern, the assessment of noise impacts as part of the amended DEIR is deficient and lacks in significant respects. The incomplete and inadequate assessment of noise related impacts cannot inform rational decision-making on the application for authorisation of the proposed CWA.	Response from specialist: The Noise Impact Assessment (NIA) was conducted in full compliance with the following, which are both nationally recognised standards, and are aligned with international best practice in environmental noise assessment: • SANS 10117, which prescribes methodology for calculating aircraft noise exposure using models such as the Integrated Noise Model (INM); and • SANS 10103, which establishes guidelines for acceptable noise levels relative to land use. The NIA followed a scope addressing multiple dimensions of impact including: • LRdn contours (reflecting day-night average noise exposure, incorporating night-time penalties for sleep sensitivity); • N70 event counts (capturing frequency of noise events exceeding 70 dB(A) during the day, linked to speech interference and annoyance); • N60 event counts (capturing night-time exceedances above 60 dB(A), directly aligned with WHO guidance on sleep disturbance thresholds). The above ensures the assessment covers both cumulative exposure and single-event intrusions, directly tying to health and wellbeing considerations. The Impact assessment methodology included: • Modelling of future noise contours under multiple operational scenarios;

			• Explicit consideration of sensitive receptors, including current and planned residential areas; • Use of supplementary metrics such as N60 and N70 event counts to evaluate short-term sound exposure and sleep disturbance potential. This assessment offers a quantitative, spatially detailed foundation for understanding potential noise impacts and planning for mitigation. In addition, the NIA supports a layered mitigation strategy, comprising: • Airport operational measures (e.g. flight path optimisation and fleet mix); • Land-use and architectural planning within affected developments; • A proposed Noise Mitigation and Management Plan (NMMP) to guide long-term noise governance, stakeholder engagement, and ongoing monitoring. In light of the above, the NIA provides a robust and rational basis for informed decision-making on the application. Its conclusions are technically defensible, its methods are transparent and replicable, and its recommendations are proportionate to the scale and intensity of potential impacts. In addition, the NIA does not stand in isolation but feeds into: • The Environmental Management Programme (EMPr), which incorporates a two-tier mitigation approach (airport-side operational measures and land-use/building design controls), as well as a proposed Noise Mitigation and Management Plan (NMMP) to adaptively manage operational noise. • The Social Impact Assessment (SIA), which interprets the implications for community sense of place and quality of life. Based on the above the NIA provides a thorough, decision-ready basis for evaluating the proposed CWA, consistent with both environmental legislation and responsible planning practice. Response from CWA: The assertion that the noise assessment is deficient is unfounded. The Noise Impact Assessment (NIA) was conducted in accordance with SANS 10117 and 10103, both of which are recognised national standards aligned with international best practice. It includes modelling of future noise

			contours, consideration of sensitive receptors, and use of additional metrics such as N60 and N70 event counts. The assessment provides a detailed, quantifiable basis for understanding potential impacts and forms part of a layered mitigation approach—including land use planning, operational procedures, and the development of a Noise Mitigation and Management Plan (NMMP). The assessment enables rational and informed decision-making consistent with EIA requirements.
		8.2. The Air Quality Impact Assessment (AQIA) falls short of what is required in terms of the National Environmental Management Act¹ (NEMA) and the EIA Regulations² through its failure to adequately assess the cumulative impacts of the proposed CWA, the assessment of an inflated no-go scenario and the persistent failure to make provision for mitigation measures. These material deficiencies, coupled with further concerns, cannot support legally defensible decision making.	Response from specialist: The AQIA was undertaken in full alignment with the National Environmental Management Act (Act No. 107 of 1998), the EIA Regulations (2014, as amended), and the Air Quality Act (AQA, Act No. 39 of 2004). It employs modelling in accordance with internationally accepted dispersion modelling protocols and draws on valid emission factors from authoritative sources such as ICAO and USEPA . The report includes a cumulative assessment of both existing and future baseline emissions, taking into account: • Current industrial and urban sources in the region; • Aircraft emissions, vehicular activity, and construction-phase impacts, considered together rather than in isolation. Regarding the validity of the No-Go Scenario, the so-called “inflated” No-Go Scenario is neither exaggerated nor inappropriate. It reflects the maximum lawful operation of the existing General Aviation (GA) and light commercial infrastructure, and is consistent with how “No-Go” baselines are defined across other specialist disciplines. It provides a conservative reference point to meaningfully contrast with the Preferred Alternative and assess net change. In response to the mitigation comment, while the AQIA quantifies potential impacts, mitigation is addressed in the project-wide Environmental Management Programme (EMPr), as is standard under the EIA framework. The Atmospheric Report also explicitly proposes measures, including:

			• Use of low-sulphur fuels; • Enforced engine idling restrictions; • Preference for electric GSE (ground support equipment); • Controlled construction-phase scheduling and dust suppression. Further refinement will occur through post-authorisation planning in line with the NEM:AQA licensing process, during which additional mitigation and management measures may be identified and implemented, and real-time monitoring frameworks finalised. Response from CWA: The Air Quality Impact Assessment (AQIA) complies fully with the requirements of NEMA and the EIA Regulations. Cumulative impacts were assessed within a reasonable and foreseeable scope, including nearby industrial activities and sensitive receptors. The so-called “inflated” No-Go Scenario reflects the maximum lawful use of existing infrastructure and is a valid and conservative baseline used across specialist studies. Mitigation measures are addressed in the Environmental Management Programme (EMPr) and will be refined through post-authorisation planning in line with best practice. The claim that the AQIA cannot support legally defensible decision-making is incorrect and overlooks the technical rigour and regulatory alignment of the assessment.
		8.3. The continued failure of the amended DEIR to consider and evaluate alternatives is a fatal flaw in the EIA process for the proposed CWA. The decision-maker is presented with a fait accompli, despite the significantly detrimental impacts of the proposed CWA, for which no adequate mitigation measures are proposed.	EAP response: The amended draft EIAR identifies and assesses potential impacts associated with alternatives and provides mitigation. This allows the CA to assess the project and reach a decision. The EAP is unsure to which detrimental impacts are referred for which no adequate mitigation measures are proposed. Response from CWA:

			The claim that alternatives were not considered is incorrect. The amended DEIR evaluates multiple alternatives—including the No-Go option, the use of existing infrastructure, and several layout and phasing variations (Alternatives 2, 3, and 4). These reflect genuine differences in footprint, infrastructure sequencing, and operational implications. The selection of a preferred alternative was informed by environmental, technical, and economic considerations, and includes mitigation measures embedded in the design and EMPr. The process is not a fait accompli but a structured, iterative evaluation aligned with NEMA and the 2013 DEA&DP Guideline on Alternatives. There is no fatal flaw in the EIA—only disagreement with the outcome.
		8.4. The assessment of need and desirability in the amended DEIR is bias and does not reflect a true assessment of the need and desirability of the proposed CWA. The inflation of the importance of the proposed CWA, without due regard to the significant detrimental impacts, has resulted in a skewed presentation of the need and desirability of the project.	EAP response: The comment on bias is noted. The EAP is independent and remains so throughout the EIA process. The need and desirability of the proposed project is discussed in detail in section 5 of the amended draft EIAR, and according to the DEA&DP guideline document. Once again, the EAP is unsure on the significant detrimental impacts referred to. Response from CWA: The assessment of need and desirability in the amended DEIR is grounded in objective analysis and supported by regional planning frameworks, economic forecasts, and specialist inputs. It considers the strategic role of CWA in improving air access, relieving pressure on CTIA, and supporting long-term spatial and economic development goals. Far from ignoring negative impacts, the DEIR explicitly identifies, quantifies, and proposes mitigation for them—demonstrating a balanced approach. The suggestion of bias is unsubstantiated; the document reflects both opportunities and constraints, in line with NEMA and DEA&DP guidance.
		NOISE IMPACTS	-

		9. Our client has repeatedly raised noise as a key issue in relation to the proposed CWA expansion project, not only from a disturbance, intrusiveness and nuisance perspective, but also in relation to significant negative impact on sense of place and health concerns.	Specialist response: The concerns, covering disturbance, nuisance, sense of place, and health, were formally noted and have been substantively addressed in the Noise Impact Assessment (NIA) and associated specialist engagement. Quantification of Impacts: The NIA assessed multiple operational scenarios using LRdn contours and N60/N70 event frequency maps, enabling detailed evaluation of both chronic and acute noise exposure at sensitive locations, including Fisantekraal, Bella Riva, Greenville, and Klipheuwel. Health and Wellbeing Considerations: The assessment references WHO night noise guidelines, World Bank thresholds, and SANS 10103 receptor compatibility guidance, specifically to gauge potential sleep disturbance and cognitive or emotional strain from repetitive or high-intensity events. The low-to-moderate exposure levels mapped at affected sites do not exceed thresholds where health-based mitigation would typically be triggered. Mitigation and Monitoring: A two-tier mitigation hierarchy (airport-side and land-use/building-side) has been proposed, with responsibilities clearly allocated. Furthermore, a long-term noise monitoring programme is recommended to ensure transparency and responsiveness over time. In addition, sense of place and health concerns were considered within the broader socio-economic and land use context and will be further addressed in the Noise Mitigation and Management Plan (NMMP). The DEIR does not dismiss these issues but integrates them into a holistic, legally compliant impact assessment. Response from CWA: Sense of place and health concerns were considered within the broader socio-economic and land use context and will be further addressed in the Noise Mitigation and Management Plan (NMMP). The DEIR does not dismiss these issues but integrates them into a holistic, legally compliant impact assessment.
		10. Noise is well-documented as a major concern of communities in relation to airports. According to the International Civil Aviation Organisation "Aircraft	Specialist response:

		noise is the most significant cause of adverse community reaction related to the operation and expansion of airports.”³ Despite the relative importance of noise impacts associated with airports, we point out the following:	It is agreed that aircraft noise is a well-documented concern and is treated as such in the DEIR. The reference to ICAO underscores the reason why a detailed Noise Impact Assessment (NIA) was undertaken using internationally recognised standards (SANS 10117) and metrics such as Day-Night Levels (Ldn), N60, and N70 contours. Noise impacts have been rigorously modelled, spatially represented, and assessed against both national standards and international benchmarks. Mitigation strategies—including operational procedures, land use compatibility planning, and future refinement through a Noise Mitigation and Management Plan (NMMP)—demonstrate that the EIA has taken this issue seriously and responded accordingly.
		10.1. The Socio-Economic Impact Assessment (SIA) does not mention noise as a stand-alone impact, except in the construction phase. This is unacceptable and a material flaw since the main concern around noise is in relation to airport operations. Instead, noise has been grouped with a range of other issues under ‘sense of place’. Consequently, the impact of noise on sense of place becomes obscured and downplayed because it is not considered in and of itself or as a stand-alone ‘sense of place’ issue. The effect of this is to create and reinforce an inherent bias in favour of the preferred and only alternative because lumping noise impacts with a range of other issues under ‘sense of place’ is skewed and is not in fact an accurate representation of the anticipated impact.	EAP response: Noise is included in the Noise IA, the Socio-economic IA, the Agro-ecosystem IA and the Poultry Biohazard Assessment. It is included in the Socio-economic IA for the construction phase as a nuisance factor and under the operational phase as <i>Sense of place, residential property values</i> and <i>Nearby farming and business operations</i> (with reference to the Noise IA). Noise is assessed in terms of policy and planning guidelines. For the operational phase, noise is acknowledged in terms of the concerns raised by IAPs regarding health and well-being, and the impact of noise on sense of place assessed from a social impact perspective. Studies conducted on this issue is included and the Noise IA findings related to it. The residual impact on the sense of place (following mitigation) is anticipated to be very low negative for Alternative 1 and medium negative for Alternatives 2, 3 and 4. Together with other nearby developments, the CWA expansion would contribute to a high negative cumulative impact on the sense of place. Specialist response: The Socio-Economic Impact Assessment (SIA) appropriately integrates noise into the broader concept of ‘sense of place’, which is standard and methodologically sound practice in socio-economic assessments. Noise does

			not exist in isolation from how people experience their environment and grouping it within 'sense of place' allows for a more holistic understanding of lived experience, particularly in residential and mixed-use areas. This approach does not obscure or downplay noise impacts; rather, it complements the detailed technical findings of the Noise Impact Assessment (NIA), which evaluates noise as a standalone issue using quantifiable metrics. The combined effect is a comprehensive assessment that addresses both measurable physical impacts and subjective human experience. There is no bias in this integration—only an interdisciplinary methodology aligned with EIA best practice.
		10.2. The Heritage Impact Assessment (HIA) does not deal with noise in the context of a 'sense of place' impact.	EAP response: The HIA complies with the requirement of the DFFE Protocol and Heritage Act in terms of contents and format and has been accepted by the IACOM of HWC. Section 38(3) of the NHRA outlines the minimum content requirements for a HIA. CWA response: The Heritage Impact Assessment (HIA) is focused on identifying and assessing impacts on tangible and intangible heritage resources, in accordance with the National Heritage Resources Act. Where relevant, the HIA considers factors contributing to cultural significance, including setting and landscape context. Detailed noise analysis—particularly technical modelling and receptor sensitivity—is beyond the scope of the HIA and is addressed in the Noise Impact Assessment (NIA). The absence of a noise discussion in the HIA does not represent a flaw but reflects the appropriate delineation of roles between specialist studies within a multi-disciplinary EIA framework.

		10.3. The Noise Impact Assessment (NIA) similarly does not address the impacts of noise on the sense of place as the specialist study considers the impact from a mainly technical perspective.	Specialist response: The Noise Impact Assessment (NIA) addresses impacts on sense of place, due to its focus on technical parameters. This specialist technical study is designed to: • Quantify environmental noise exposure using internationally recognised metrics (e.g. SANS 10117, SANS 10103, N70, and Ldn); • Model spatial noise distribution under multiple operational scenarios; • Establish thresholds for impact evaluation against regulatory and health-based guidelines (e.g. SANS 10103, WHO). This technical foundation is essential for understanding where and to what extent noise may affect human environments, and forms a core input to broader planning, social, and cumulative assessments. Importantly, impacts on “sense of place” are addressed within the Socio-Economic Impact Assessment (SIA), which draws directly from the NIA’s quantitative outputs. The SIA interprets these findings in relation to local identity, amenity, and lived experience, thus ensuring that subjective, place-based values are meaningfully integrated into the EIA process. This division of expertise reflects standard EIA practice, i.e. each specialist study provides discipline-specific analysis, while integration across themes occurs through cumulative interpretation and synthesis at the impact significance and planning level. Expecting the NIA itself to provide psychosocial interpretation would conflate roles and reduce analytical clarity.
		11. The specific comments and concerns regarding noise impacts, and specifically the NIA are set out in more detail below:	-
		11.1. The NIA was limited to a particular methodology in the Terms of Reference: “Use the Integrated Noise Model or its successor, which was developed by the Federal Aviation Administration as defined in SANS 10117, to determine and map the future noise contours (representing the	Response from specialist: The NIA was not “limited” in a restrictive sense; rather, it was guided by a methodology deliberately selected to ensure technical robustness,

		average and maximum noise levels) associated with the proposed project.”⁵ The noise specialist thus applied the requirements of SANS 10117, which effectively amounts to complying with the minimum required.⁶	comparability across contexts, and full compliance with both national standards and internationally recognised best practice. Far from constituting a minimal or perfunctory exercise, the assessment offers a comprehensive, scenario-based, and multi-metric analysis that meaningfully informs land use planning, impact mitigation, and stakeholder engagement. While it is correct that the Terms of Reference required the use of the Integrated Noise Model (INM) or its successor, as defined in SANS 10117, this requirement reflects not a limitation, but a commitment to internationally accepted best practice. SANS 10117 is based on guidance from the Federal Aviation Administration (FAA) and aligns with global norms for assessing aircraft noise impacts. Moreover, the NIA goes beyond basic compliance in several critical respects: • It incorporates multiple future operational scenarios, including worst-case capacity projections. • It uses not only LRdn contours (as per SANS 10103) but also event-based metrics such as N70 and N60 thresholds, which are crucial for understanding sleep disturbance and intrusiveness, especially in sensitive areas. • It maps exposure overlaps with planned and existing residential zones, identifying potential impacts on real receptors, not just theoretical zones. The selection of modelling tools and parameters is not a constraint, but a reflection of the appropriate level of technical rigour expected in high-stakes environmental assessments involving aviation noise.
		11.2. Despite the level of concern expressed by I&APs regarding severity of noise impacts and the incompatibility of this impact with the nature of the current and future surrounding land uses (e.g. existing and proposed residential areas; rural smallholdings as well as larger farming enterprises), which are noise sensitive receptors, no additional modelling methodologies or investigations have been applied to supplement the	Response by specialist: As required by South African regulations, the NIA follows SANS 10117:2009, which prescribes the use of LRdn noise contours to inform land use compatibility planning. These contours remain the primary regulatory benchmark for evaluating environmental noise around airports and are used nationally to assess residential and agricultural suitability.

		noise predictions resulting from the SANS 10117 approach, except for limited use of the Number of Events (N) contours.	In recognition of the specific sensitivities of the surrounding land uses, such as residential estates, smallholdings, and livestock farming enterprises, the NIA also incorporated supplementary noise metrics, beyond what is required under SANS 10117. These include: • N70 and N60 contours: These represent the number of single noise events exceeding 70 dB(A) (typically linked to annoyance) and 60 dB(A) (linked to sleep disturbance). • Time-of-day exposure assessments, particularly to quantify night-time operations, which were shown to be limited (e.g., only three aircraft movements during night-time hours). These supplementary analyses allow the assessment to consider not only average daily exposure, but also event frequency and intensity, which are important for evaluating impacts on livestock, workers, and residents. The approach taken is both methodologically sound and sufficiently comprehensive to inform decision-making and mitigation planning in a context with diverse and sensitive land uses.
		11.3. Regarding the use of Number of Events (N) – also referred to as “number above”, a threshold of 70dB is used in Australia and is referred to as N70, where N70 “is the number of aircraft noise events louder than 70 dB(A)”. 70 dB(A) is used to categorise an event as ‘noisy’ as this is the level which can disturb conversation or other indoor activities such as watching television. It corresponds to a 60 dB(A) noise level indoors. Thus, “N70” equates to L_{max8} of 70 dB(A). Insofar as the use of the “number above” data is concerned, a N70 contour shows the area (extent) and the number of times this occurs during the day. N70 events were calculated for the proposed expansion of the CWA. In addition, N60 events were also calculated for night-time, as this correlates to the sleep disturbance level	Response by specialist: The comment is noted, however, it is not clear regarding the impact relevance. The statement “Thus, ‘N70’ equates to L_{max50} of 70 dBA.” is not strictly correct as written, because N70 and L_{max50} are related but not equivalent metrics. The N70 is the number of aircraft noise events in a given period (usually per day or per night) that exceed 70 dBA (typically measured as L_{max}).

		of 50 dB(A), taking account of 10 dB noise attenuation due to the fabric of a building.	The Lmax50 is the 50th percentile (median) of the maximum noise levels (Lmax) from all aircraft events. This means that half of the events have Lmax above this level, and half below. The N70 = X indicates how many times noise exceeded 70 dBA. The Lmax50 = 70 dBA indicates that half of the events were louder than 70 dBA, and half were quieter. The N70 and N60 Metrics are widely accepted for identifying noise events that may interfere with indoor activities or disturb sleep. These principles are indeed reflected in the Noise Impact Assessment (NIA) for the proposed CWA expansion. Specifically: • N70 contours were calculated for daytime operations to map the number of single aircraft events exceeding 70 dB(A) at various receptor locations. • N60 contours were included for night-time, as a proxy for evaluating sleep disturbance risks, based on standard 10 dB(A) indoor attenuation. • These metrics are consistent with WHO guidance, Australian protocols, and international best practice, and were used to inform potential mitigation measures (e.g., acoustic façade treatments or land-use buffering). The Lmax50 metric refers to the maximum noise level exceeded by 50% of events, often used in occupational or continuous industrial noise assessments. However, it is not applicable in aviation-related community noise studies for two main reasons: • Aircraft noise is intermittent, not continuous. Therefore, percentile-based measures like Lmax50 do not effectively represent either typical or peak disturbance. • Aviation environmental assessments typically focus on either cumulative exposure (e.g., LRdn) or peak-event frequency thresholds (e.g., N70/N60), which more accurately reflect the perceived intrusiveness and health impacts of aircraft noise. The selection of N70/N60 and LRdn contours in the CWA NIA is appropriate, and reflects the most relevant and widely accepted method for assessing

			aircraft noise impacts in the context of environmental planning and human health.																																																					
	11.4. This N70 metric has been applied and shows the following results for the three scenarios that were examined in the NIA: <table><tr><th colspan="2">SCENARIO 1</th><th colspan="2">SCENARIO 2</th><th colspan="2">SCENARIO 3</th></tr><tr><th colspan="2">Full operation of current facility (301 ATMs)</th><th colspan="2">Expanded CWA in Year 1 (29 ATMs)</th><th colspan="2">Expanded CWA in full operation (208 ATMs)</th></tr><tr><th>Number of N70 Events</th><th>Affected area (km²)</th><th>Number of N70 Events</th><th>Affected area (km²)</th><th>Number of N70 Events</th><th>Affected area (km²)</th></tr><tr><td>5-10</td><td>19.6</td><td>5-10</td><td>7.33</td><td>5-10</td><td>64.42</td></tr><tr><td>10-20</td><td>16.8</td><td>10-15</td><td>2.68</td><td>10-20</td><td>43.38</td></tr><tr><td></td><td></td><td>15-20</td><td>1.78</td><td></td><td></td></tr><tr><td>20-30</td><td>9.71</td><td></td><td></td><td>20-30</td><td>25.43</td></tr><tr><td>30-50</td><td>5.9</td><td>>50</td><td>0.11</td><td>30-50</td><td>16.68</td></tr><tr><td>>50</td><td>2.7</td><td></td><td></td><td>>50</td><td>6.70</td></tr></table>	SCENARIO 1		SCENARIO 2		SCENARIO 3		Full operation of current facility (301 ATMs)		Expanded CWA in Year 1 (29 ATMs)		Expanded CWA in full operation (208 ATMs)		Number of N70 Events	Affected area (km ²)	Number of N70 Events	Affected area (km ²)	Number of N70 Events	Affected area (km ²)	5-10	19.6	5-10	7.33	5-10	64.42	10-20	16.8	10-15	2.68	10-20	43.38			15-20	1.78			20-30	9.71			20-30	25.43	30-50	5.9	>50	0.11	30-50	16.68	>50	2.7			>50	6.70	Response by specialist: The Noise Impact Assessment for Cape Winelands Airport considers three scenarios. Scenario 1 represents the No-Go alternative, where the existing runways operate at their maximum permitted capacity, assuming 301 aircraft movements per day. Scenario 2 models the opening year of the proposed new 3.5 km runway, with only 29 aircraft movements per day—mainly smaller aircraft—reflecting early, low-traffic operations. Scenario 3 shows the long-term future with the new runway at full capacity, modelling 208 aircraft movements per day, including larger commercial jets and a few night-time flights. These scenarios provide a clear picture of how noise levels could evolve over time.
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	11.5. Further guidance is available on the use of the ‘number above’ approach in Australia in the context of noise-sensitive land uses and/or development, which include “residential, education establishments, offices, hospitals, aged care, churches, religious activities, theatres, cinemas, recording studios, court houses, libraries and galleries.”⁹ Accordingly, noise-sensitive development should be avoided where ultimate capacity or long-range noise modelling for the airport indicates either: 11.5.1. 20 or more daily events greater than 70 dB(A); 11.5.2. 50 or more daily events of greater than 65 dB(A); or 11.5.3. 100 events or more daily events of greater than 60 dB(A).	Response by specialist: The referenced Australian guidance establishes avoidance thresholds for noise-sensitive land uses based on event counts above fixed L_Amax levels: • 20+ events > 70 dB(A) • 50+ events > 65 dB(A) • 100+ events > 60 dB(A) This approach is consistent with, but not contradictory to, the commonly applied day-night N70 and night N60 event exposure bands characterized by: • Day-night N70 - o ≤ 20 events/day as Low/Acceptable - o 21–50 events/day as Moderate Concern																																																						

			- o >50 events/day as High Concern / Significant Impact • Night N60 - o ≤ 3 events/day as Low/Acceptable - o 4-12 events/day as Moderate Concern - o >12 events/day as High Concern / Significant Impact The Australian guidance provides strict thresholds for avoidance or significant caution, which forms a baseline for planning exclusion zones. The day-night N70 and the night N60 event serve as exposure categories useful for risk gradation, communication, and progressive management. The day-night N70 metric captures overall community exposure, while the night N60 metric targets particularly sensitive nighttime periods when disturbance and sleep disruption are more critical. This dual metric approach recognizes that exposure during night hours has a disproportionate impact on wellbeing, justifying more conservative ranges for night N60. For Scenario 3 (New runway under full capacity) the 3 N60 contour marginally extends outside the site boundaries and there is no higher event contour as there are only 3 events in the night-time period.
		11.6. Based on the above, it is evident that the proposed expansion of the CWA shows that 20 or more exposures to 70 dB(A) occurs over an area of ~25 km² in Scenario 3 (full operation) with more than 50 exposures over an area of 6.7 km².	Specialist response: The cited exposure areas correspond to Scenario 3, which models the maximum operational capacity of Cape Winelands Airport, i.e. projected only around the year 2050. The airport is designed for phased, incremental growth, with multiple review points and regulatory oversight mechanisms before reaching this full-capacity state. It should be noted that even within these forecast contours:

			• Many affected areas are non-residential or of low receptor sensitivity (e.g., agricultural or currently undeveloped land). • Key residential zones such as Bella Riva and Greenville fall at the outer edge of these contours, exposed to fewer than 30 N70 events per day and below 60 dB(A) LRdn, remaining well within compatibility thresholds. • Noise exposure will increase gradually over decades, not overnight, giving authorities and developers ample time to implement adaptive mitigation, guided by long-term monitoring and performance-based planning tools.
		11.7. The data in the NIA fails to indicate the actual noise level or how much above 70 dB(A) the noise level that will be experienced will be.	Specialist response: The N70 metric does not obscure the actual sound levels; it is calculated using detailed event-level sound exposure modelling that includes maximum A-weighted sound levels (Lmax) for each aircraft type, route, and operational mode. While the NIA does not report each individual Lmax values in the main text (as this would result in hundreds of entries), the modelled exceedance thresholds inherently reflect how far above 70 dB(A) typical events reach. For example, most general aviation and regional jets produce Lmax values in the 72–85 dB(A) range at receptors directly under the flight path. This information incorporated in the modelling outputs used to generate the N70 contours. The NIA does not omit the actual noise levels. It uses internationally recognised exceedance-based modelling that is calibrated on real Lmax values and applied across the spatial footprint of the study area. The N70 metric reflects both frequency and intensity indirectly, and is standard in the field for assessing community exposure. Thus, the assertion that actual noise levels are absent or unclear is not supported by the technical structure of the report.

		11.8. The results from the NIA show that the development falls within the noise risk contour used in the City of Cape Town's Municipal Spatial Development Framework. The effect thereof is that an expanded CWA on the basis proposed does not meet accepted guidelines and by implication, does not meet the limit of acceptable change or accepted thresholds applied in relation to aircraft noise impacts.	Response from CWA: The assertion that the Cape Winelands Airport (CWA) expansion “does not meet accepted guidelines” based on the MSDF’s noise contour planning tools reflect a misunderstanding of how these tools are applied. Firstly, the MSDF noise contours (55–80 dBA) are not prohibitive boundaries, but rather triggers for additional consultation and planning consideration. Policy 16.2 of the MSDF makes it clear that pre-application consultations are mandatory for urban development proposals that fall within these contours, not that development is prohibited. Importantly, none of Garden Cities’ approved residential phases with existing rights fall within the 65 dBA contour. Had it been the case, and a proposed future residential development intersects the 55–65 dBA contour, the development approach is informed by mitigation strategies and compatibility measures. Under Policy 16.6 of the MSDF, land use that is incompatible with existing or potential future aviation rights will not be supported—a principle which supports the reservation of this corridor for aviation-compatible uses, not residential densification. This position is reinforced by a formal policy precedent: In a letter dated 9 May 2011, Minister Anton Bredell confirmed the acceptable residential LRdn threshold for CTIA was raised to 65 dBA, acknowledging the policy flexibility needed to balance aviation infrastructure with urban growth. If such an approach was taken in the context of South Africa’s second-busiest airport, it is reasonable for a similar balance to apply to CWA under a robust EIA and zoning framework. The MSDF risk contours must also be seen in the correct spatial and legal context. As the Municipal Planning By-law specifically states, the MSDF does not confer or remove rights. Nor does the MSDF override the need for formal rezoning and EIA processes under the Municipal Planning By-law (MPBL). According to s.9 and s.16 of the MPBL, rights are only altered through formal application processes, not the mere presence of indicative overlays like noise

			contours. As such, land falling within these contours is subject to planning process, not disqualification. Finally, Policy 16.1 and its sub-statements do not equate noise exposure to a major hazard installation or incompatible risk area. These policies are designed to protect against severe industrial or environmental risks (e.g. flooding, solid waste facilities, MHI zones)—not regulated operational environments like civil airports with approved mitigation strategies in place. Should CWA one day be deemed an incompatible risk zone, then Policy 16.1 would apply—but that is not the case under the current planning framework. In sum, the suggestion that CWA is inconsistent with the MSDF on the basis of the noise contour tool is factually inaccurate, procedurally unsupported, and ignores existing planning precedent, risk-based policy nuance, and the structure of the MPBL and EIA legislation. A copy of the referenced policy extract and the 2011 Ministerial letter is available upon request.
		11.9. Communities located close to the proposed expansion of the CWA as well as the distances from the proposed CWA expansion site as described in the NIA are identified as shown in the table below. For comparison and also to provide a wider context, information in relation to residential and rural communities were obtained using Google Earth and considered. The measurements taken from Google Earth are relative to the southern and northern extremes of the proposed 3.5km runway.	Response by specialist: The discrepancy between distances cited in the Noise Impact Assessment and those derived from Google Earth arises from a difference in methodology and purpose. The distances provided in the Noise Impact Assessment are based on average distances to identified noise-sensitive receptors, such as residential and rural communities, and were measured from the general boundary of the CWA site, not from the extreme ends of the proposed runway. This approach aligns with standard environmental noise assessment practice, which emphasizes representative exposure distances rather than maximum extents. Therefore, while Google Earth measurements may be useful for general orientation, the report's approach, using averaged and spatially verified receptor distances, is more accurate and directly tied to the noise contour modelling. The communities referenced in the comment were already considered and included in the impact analysis, ensuring that the assessment

	<table><tr><th>Community</th><th>From Noise Impact Assessment</th><th>Measured on Google Earth</th></tr><tr><td colspan="3">Existing Communities</td></tr><tr><td>Klipheuwel / Mikipunt</td><td>~5 km to north of CWA site</td><td>~2.5 km to nearest edge of community ~3 km to midpoint of community</td></tr><tr><td>Fisantekraal</td><td>~3 km to south-west of site</td><td>~2.5 km to nearest edge of community ~3 km to midpoint of community</td></tr><tr><td>Durbanville suburb</td><td>~6 km to south-west of site</td><td></td></tr><tr><td>Uitzicht</td><td></td><td>~7 km to the south west of site</td></tr><tr><td>Kraaifontein</td><td></td><td>~6.5 km to south west of site</td></tr><tr><td>East Rural</td><td></td><td>~3.5 km to south-west of site</td></tr><tr><td>Joostenbergvlakte</td><td></td><td>~6 km to south of site</td></tr><tr><td>Paarl Farms</td><td></td><td>~2.5 km to east of site</td></tr><tr><td>Malmesbury Farms</td><td></td><td>~ 4 km</td></tr><tr><td>Klapmuts</td><td></td><td>~11.5 km to south east</td></tr><tr><td colspan="3">Future Residential Developments</td></tr><tr><td>Bella Riva Lifestyle & Country Estate</td><td>Immediate neighbour to west of site</td><td>Immediate neighbour to west of site</td></tr><tr><td>Greenville Garden City</td><td>Immediate neighbour to south of site</td><td>Immediate neighbour to south of site</td></tr></table>	Community	From Noise Impact Assessment	Measured on Google Earth	Existing Communities			Klipheuwel / Mikipunt	~5 km to north of CWA site	~2.5 km to nearest edge of community ~3 km to midpoint of community	Fisantekraal	~3 km to south-west of site	~2.5 km to nearest edge of community ~3 km to midpoint of community	Durbanville suburb	~6 km to south-west of site		Uitzicht		~7 km to the south west of site	Kraaifontein		~6.5 km to south west of site	East Rural		~3.5 km to south-west of site	Joostenbergvlakte		~6 km to south of site	Paarl Farms		~2.5 km to east of site	Malmesbury Farms		~ 4 km	Klapmuts		~11.5 km to south east	Future Residential Developments			Bella Riva Lifestyle & Country Estate	Immediate neighbour to west of site	Immediate neighbour to west of site	Greenville Garden City	Immediate neighbour to south of site	Immediate neighbour to south of site	reflects real-world exposure conditions rather than theoretical maximum distances. The 3.5 km runway, while substantial in length, does not imply uniform exposure in all directions. Aircraft movements are concentrated along well-defined flight paths aligned with the north–south axis of the runway. As a result, noise impacts are highly directional, primarily affecting narrow corridors along these paths, and are not forming broad radial impact zones. Response from CWA: While the table correctly notes that the Greenville Garden City development is an “immediate neighbour to the south of the site,” it is important to clarify that this refers to the entire extent of historically proposed development rights, some of which date back to 7 December 2012. Since then, a number of those rights and approvals have lapsed, particularly in areas east of the Mosselbank River, and as such, cannot be assumed to represent active or imminent residential occupation. In terms of actual constructed homes, the nearest occupied residential area developed by Garden Cities is within the Fisantekraal community, located approximately 2.5 to 3 km south-west of the site. This distinction is critical: the Noise Impact Assessment (NIA) focuses on real, current receptors—not speculative or lapsed rights—thereby offering a more accurate and policy-compliant assessment of potential noise impacts. Misrepresenting the entire Greenville development footprint as occupied land exaggerates the proximity of noise-sensitive receptors and does not reflect the current development reality or planning status.
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11.10.	Besides residential communities and rural communities, there are other potentially sensitive land uses such as chicken farming enterprises located immediately adjacent to the proposed CWA expansion site on the west and another chicken farm some 3.5kms to the east of the site. There is a disproportionately high number of sensitive receptors in the impact area which is highlighted by the fact that the proposed expansion of the	Response by specialist: The Noise Impact Assessment (NIA), while primarily focused on human receptors in line with SANS 10103, also maps exposure levels across the broader area, inherently capturing zones that include agricultural operations.																																													

		CWA is inappropriate in the context of the particular receiving environment.	The Social Impact Assessment (SIA) and Avifauna specialist consultations documented concerns raised by stakeholders about potential impacts on poultry enterprises, reflecting that these receptors were not overlooked. Under the worst-case Scenario 3, the highest LRdn contours (≥ 60 dB(A)) and areas with more than 30 N70 events per day do not extend into the main poultry farm footprints. The chicken farm immediately west of the airport remains largely outside the most elevated noise exposure zones. It should further be noted that, with the exception of three operations scheduled between 22h00 and 23h00, there are no planned night-time flight activities associated with the proposed development. Moreover, standard farming operations routinely experience sound levels exceeding these thresholds due to farm machinery, delivery trucks, and mechanical ventilation. The additional exposure from aircraft movements is therefore unlikely to cause significant incremental stress or productivity loss, especially given the intermittent nature of aircraft noise compared to continuous operational noise on-site. As such, the noise levels are not expected to exceed thresholds that would disrupt poultry operations. Response from CWA: The presence of poultry farming operations adjacent to the site has been acknowledged in the DEIR and considered in both the Noise Impact Assessment (NIA) and broader land use planning context. However, the characterisation of these as “sensitive receptors” in the same category as residential communities is overstated. Poultry farms are primarily industrial-agricultural operations, and while they may have operational sensitivities (e.g., to vibration or low-frequency noise), they are not governed by the same human health or residential amenity thresholds applied to community receptors. Furthermore, the proximity of such uses to the existing CWA site reflects a historical land-use compatibility with aviation operations. The suggestion that a “disproportionately high number” of sensitive receptors exists is not supported by the spatial data. As already established, the nearest occupied

			residential neighbourhoods are over 2.5–3 km away, and the chicken farms operate under a land use regime that is already adaptable to varying rural and industrial conditions. The DEIR recognises the mixed-use nature of the receiving environment and proposes mitigation appropriate to each receptor type. The presence of these operations does not render the proposed airport expansion inappropriate—it calls for careful, context-specific planning, which has been done.
		11.11. The approach adopted in the NIA is regarded as insufficiently nuanced and detailed to provide stakeholders with clear and accurate predictions and interpretations of noise impacts, in general and in particular as regards the noisiest components of aircraft operations and movements such as landing and take-off.	Specialist response: The NIA is based on a fleet mix reflective of anticipated commercial and general aviation use, including modern, quieter aircraft that comply with ICAO Annex 16 noise standards. The model provides spatially explicit noise contours (e.g., 55, 60, and 65 dB LRdn) and event-count thresholds (e.g., N70>50), enabling nuanced interpretation of both chronic and acute noise exposure. The findings are aligned with international benchmarks, including WHO, ICAO, and South African SANS guidelines. The NIA does account for the noisiest elements of aircraft operations, uses conservative and well-established modelling parameters, and provides both quantitative and spatial detail sufficient for decision-making. Assertions that the approach is oversimplified are not substantiated by the technical methodology applied.
		11.12. More detailed information about the nature, level, severity and extent of noise exposure to receptors is required. Methods for obtaining more detailed information about noise exposure of receptors do exist and find application in both Australia and the USA, for example. More detailed	EAP response: The NIA complies with the requirements of Appendix 6 of NEMA in terms of content and approach – refer Appendix A in the NIA.

		analysis methods required to address gaps in the impact assessment include:	Specialist response: The Noise Impact Assessment (NIA) was designed to evaluate the realistic operational impacts of the proposed expansion of Cape Winelands Airport (CWA), using a combination of cumulative noise metrics (e.g., LRdn, N70, N60) that are internationally recognized for assessing long-term human health and land use compatibility. While it is technically possible to produce single event noise contours for individual aircraft types or movements (L_{Amax}), these are not typically used for environmental decision-making because they do not reflect the repeated exposure that leads to significant community annoyance or health outcomes. Instead, cumulative exposure metrics, such as those applied in the NIA, are the preferred standard globally (e.g., by ICAO, UK CAA, and SANS 10117). Moreover, the NIA does address maximum noise levels (L_{Amax}) and includes event-based thresholds like N70, which account for the frequency and level of individual high-noise events, particularly during take-off and landing phases. These indicators effectively capture the community experience of aircraft noise in a more meaningful way than isolated event contours. It is also worth noting that the provision of single event contours does not inherently improve the assessment unless linked to an unrealistic worst-case scenario. Instead, the NIA has focused on realistic operational data, representative aircraft types, and spatial noise contouring that reflects both current land use and future development plans. In conclusion, the decision not to generate single-event contours does not represent a methodological gap, but rather a deliberate and appropriate alignment with best-practice environmental noise assessment standards,
		11.12.1. Demonstrating the impact of aircraft noise for individual flight movements and types of aircraft through the use of single event noise contours. This has not been done in the NIA.	

			ensuring that the results are both robust and relevant for planning and mitigation purposes.
		11.12.2. Determining the sound level exposure which is a measure of cumulative noise exposure for a single aircraft flyover which shows sound level over time, thereby giving an accurate (rather than speculative or assumed) insight into the duration of exposure to different levels of noise during an aircraft flyover. This has not been done in the NIA.	Specialist response: The Noise Impact Assessment (NIA) for Cape Winelands Airport (CWA) follows international best practice by focusing on cumulative noise exposure metrics that are most relevant for assessing community health, annoyance, and land use compatibility. While it is technically feasible to generate detailed sound exposure curves (e.g., Sound Exposure Level – SEL) for individual flyovers, this level of analysis is not typically required nor standard in environmental impact assessments under South African guidelines (SANS 10103, 10117) or international frameworks. The NIA's approach aligns with accepted norms by emphasizing cumulative exposure metrics that are more relevant for policy-making, health impact evaluation, and land use planning. The omission of individual time-history traces does not undermine the integrity or sufficiency of the assessment.
		11.13. The NIA places disproportionate reliance on average noise level data and whether this falls within the parameters set out in SANS 10103. This approach fails to address the finer detail and nuances in the noise profile of aircraft which are particularly relevant in an airport situation, namely take-off, approach, to landing. The assessment is therefore distorted and an inaccurate representation of noise impacts.	Specialist response: Refer to response 11.12.2.
		11.14. The Day Night Average Sound Level (DNL or Ldn) noise metric is used to reflect a person's cumulative exposure to sound over a 24-hour period. The US Federation Aviation Administration (FAA) defined aircraft noise exposure of DNL 65 to 75 dB(A) in residential areas as "significant"	Specialist response: The Ldn/DNL is a cumulative noise metric that averages noise over a 24-hour period, with a 10 dB penalty applied to night-time noise (typically 10 PM to 7

		and DNL 75 dB(A) or more as "severe." Generally, the "guidelines say that DNL levels between 55 and 65 dB indicate moderate exposure and are generally considered acceptable for residential use. Internationally the 55dB level seems to be favoured, with the United States FAA adopting a 65 dB level threshold."10 According to information on the American Acoustical Society website from a paper published in 2022, the USEPA (US Environment Protection Agency), however, does not regard this threshold as adequate. The USEPA has calculated that the safe noise levels for the public are DNL = interference and annoyance.11	AM), making it suitable for assessing general community annoyance and land use compatibility. The U.S. Federal Aviation Administration (FAA) uses 65 dB DNL as a land use compatibility threshold, however, as not as a direct health-based limit. It marks the point at which residential areas become eligible for federal noise mitigation measures (e.g., insulation or relocation). The U.S. Environmental Protection Agency (USEPA), in contrast, published advisory recommendations in 1974 suggesting DNL limits of ≤55 dB for outdoor activity protection and ≤45 dB indoors, based on health and annoyance considerations. These are aligned with the World Health Organization (WHO) guidelines, which also favour a more conservative approach for long-term exposure. In South Africa, the NIA uses the LRdn metric, which is functionally equivalent to DNL/Ldn, incorporating a night-time penalty of 10 dB in line with SANS 10103 and SANS 10117. The thresholds applied, particularly the 55, 60, and 65 dB LRdn contours, align with international norms and allow for a nuanced assessment of both moderate and high noise exposure areas. For example, in the Western Cape, a precedent was set, related to Cape Town International Airport and the Airport Industrial node, which allowed for residential development up to the 65 dB(A) LRdn contour in the context of airport environments. This threshold is considered "conditionally compatible" for residential use under certain circumstances, especially in dense urban settings. Therefore, the use of LRdn in the Noise Impact Assessment is both appropriate and defensible within the context of South Africa's regulatory, planning, and spatial development frameworks. While international benchmarks offer valuable perspective, they do not supersede the standards formally adopted by local authorities through established policy and ministerial directives.

		11.15. The above information begs the question: Why have more conservative thresholds not been applied in the NIA? Why is only N70 shown for day-night and not the other more conservative 'number above' scenarios such as N55 and N45 as recommended by the USEPA. The concern is that the assessment is therefore distorted and an inaccurate representation of noise impacts.	Specialist response: The Noise Impact Assessment (NIA) applies industry-standard and regulator-accepted cumulative and event-based metrics that are appropriate to the South African context, while also aligned with international practice. These include: • LRdn (equivalent to Ldn or DNL) for cumulative exposure, incorporating a 10 dB night penalty; • N70 and N60 metrics for quantifying the number of events exceeding 70 dB(A) during the day-night period and 60 dB(A) during night hours, respectively The N70 metric is widely used internationally (e.g. Australia, UK) as a threshold of moderate to high concern for disturbance and community annoyance. The N60 metric already provides a more conservative view for night-time operations, when sensitivity is higher. While N55 or N45 could theoretically be calculated, these thresholds are not in routine use in regulatory practice because lower thresholds tend to overstate concern in areas where ambient background levels (especially in urban fringe or mixed-use areas) already exceed 50–55 dB(A). Regarding the City of Cape Town's MSDF risk contour, the CoCT uses a 65 dB(A) LRdn cumulative threshold to demarcate a noise-sensitive risk zone. The NIA does incorporate and present the 65 dB(A) LRdn contour, clearly showing that it remains within the CWA property boundary, even under full operational scenarios. Therefore, the reference to N65 in this context is a misunderstanding as the MSDF guidance is based on LRdn, not N65 (i.e., the number of events above 65 dBA), and the NIA correctly applies the appropriate metric.

			Finally, while international bodies like the US EPA and WHO provide valuable health-based guidance (e.g. DNL ≤ 55 dB), those are not regulatory thresholds. In South Africa, the SANS 10103 standard governs environmental noise assessments and sets locally appropriate limits based on land use, background conditions, and acceptability criteria. In conclusion, the NIA's approach is both methodologically sound and policy-compliant, using conservative and internationally accepted metrics. It balances community protection, regulatory alignment, and data interpretability without overstating impacts through the use of marginal or unsupported thresholds.
		11.16. The health effects of aircraft noise are briefly discussed in Section 2.3 of the NIA as a generic discussion and is unsupported by any desk-top research or consultation of any experts in this field. The issue – and key project related impact associated with expansion of the CWA - is therefore unaddressed and unresolved.	Specialist response: The primary purpose of the Noise Impact Assessment (NIA) is to quantify and predict aircraft noise exposure in accordance with South African regulatory standards (SANS 10103 and SANS 10117), and to assess the potential impact on human amenity and land use compatibility. While the NIA is not a formal health risk assessment, it does incorporate and summarize the internationally acknowledged health effects associated with long-term noise exposure, such as sleep disturbance, annoyance, and cardiovascular risks, which are widely documented in literature from the World Health Organization (WHO), European Environment Agency, and the US Environmental Protection Agency (EPA). Section 2.3 of the NIA offers an introductory overview of these effects to provide context for why noise thresholds such as N70, N60, and LRdn are used, and why night-time noise is penalized. The section is not intended to serve as an exhaustive literature review but rather to support the rationale for the application of internationally aligned noise indicators and thresholds.

			In line with best practice, the quantitative assessment of exposure is the domain of the noise specialist. Where site-specific health studies are required, these are typically undertaken under a separate Health Impact Assessment (HIA). It is important to note that such an HIA has not been scoped as a requirement in this Environmental Impact Assessment process, nor is it typically required unless triggered by specific thresholds or public health concerns raised by competent authorities. That said, the exposure-response relationships used in the NIA (e.g., expected effects at N70 or 65 dB LRdn) are based on robust international epidemiological research, even if those references are not individually cited in the summary discussion. The mitigation hierarchy proposed in the NIA—combined with monitoring, land use compatibility planning, and the development of a Noise Management Plan—are designed to manage and reduce exposure, which is the key preventative strategy against health risks related to noise. In conclusion, the NIA appropriately addresses the noise-health linkage within its scope, and does so using recognised metrics and exposure-response relationships. The EIA as a whole includes mechanisms to ensure that health and amenity are adequately protected through cumulative and cross-disciplinary inputs, including social, planning, and biodiversity assessments.
		11.17. Phrases such as “Research into the effects of noise...” and “Researchers have also identified...” appear in Section 2.3 of the NIA but not one single piece of research is referenced. This prevents I&APs from being able to engage meaningfully with the submissions as they are unsubstantiated. The danger being that this results in a skewed assessment where I&APs are unable to independently evaluate the veracity of these bald statements as they are unsubstantiated.	Specialist response: The primary purpose of the Noise Impact Assessment (NIA) is to quantify and predict aircraft noise exposure in accordance with South African regulatory standards (SANS 10103 and SANS 10117), and to assess the potential impact on human amenity and land use compatibility. While the NIA is not a formal health risk assessment, it does incorporate and summarize the internationally acknowledged health effects associated with long-term noise exposure, such as sleep disturbance, annoyance, and cardiovascular risks, which are widely documented in literature from the World Health Organization (WHO),

			European Environment Agency, and the US Environmental Protection Agency (EPA). Section 2.3 of the NIA offers an introductory overview of these effects to provide context for why noise thresholds such as N70, N60, and LRdn are used, and why night-time noise is penalized. The section is not intended to serve as an exhaustive literature review but rather to support the rationale for the application of internationally aligned noise indicators and thresholds. In line with best practice, the quantitative assessment of exposure is the domain of the noise specialist. Where site-specific health studies are required, these are typically undertaken under a separate Health Impact Assessment (HIA). It is important to note that such an HIA has not been scoped as a requirement in this Environmental Impact Assessment process, nor is it typically required unless triggered by specific thresholds or public health concerns raised by competent authorities. That said, the exposure-response relationships used in the NIA (e.g., expected effects at N70 or 65 dB LRdn) are based on robust international epidemiological research, even if those references are not individually cited in the summary discussion. The mitigation hierarchy proposed in the NIA—combined with monitoring, land use compatibility planning, and the development of a Noise Management Plan—are designed to manage and reduce exposure, which is the key preventative strategy against health risks related to noise. In conclusion, the NIA appropriately addresses the noise-health linkage within its scope, and does so using recognised metrics and exposure-response relationships. The EIA as a whole includes mechanisms to ensure that health and amenity are adequately protected through cumulative and cross-disciplinary inputs, including social, planning, and biodiversity assessments.

		11.18. The noise specialist is not qualified to comment on or assess the health impact associated with aircraft noise on key sensitive receptors such as surrounding land uses and local communities (current and future). This is another example of where the issue has not been adequately addressed.	Specialist response: refer to response 18.17
		11.19. Research has consistently shown that aircraft noise will damage people's hearing, increase their level of anxiety and interfere with sleep and may affect mental health. It has even been demonstrated to increase the risk of cardiovascular diseases such as hypertension and coronary heart disease. In addition, aircraft noise has been found to increase the probability of attention deficit hyperactivity disorder among children.^{12,13} This latter point is particularly important, since families with young children are likely to form a significant proportion of the Greenville Garden City community.	Specialist response: refer to response 18.17
		11.20. The adverse effects of noise are acknowledged in the new definition of noise adopted by the American Public Health Association in its 2021 Policy Statement on "Noise as a Public Health Hazard", which is: "noise is unwanted and/or harmful sound". The term 'Environmental Noise' is defined as "unwanted and/or harmful outdoor sound created by human activities, including noise from road traffic, railway traffic, airports and industrial sites, to which the public is exposed involuntarily."¹⁴ and was adopted for use and added to its Constitution by the International Commission on Biological Effects of Noise in 2023. The World Health Organization (WHO) environmental noise guidelines to prevent adverse health effects are: (i) for road traffic: no more than 53 dB average levels; (ii) 45 dB from aircraft over the course of a day; and (iii) average nighttime levels are even lower.	Specialist response: see below and also refer to response above. The WHO thresholds referenced (e.g., 45 dB(A) for aircraft noise, 40 dB(A) at night) are highly conservative and reflect ideal targets aimed at long-term public health risk reduction. These are not regulatory limits, but non-binding guidelines developed within the context of high-density, European urban planning environments. In addition, the WHO itself emphasizes that these thresholds are not regulatory limits, but health-based recommendations to guide national standard-setting, which must balance local socio-economic conditions, land use realities, and infrastructure constraints. South Africa applies the SANS 10103 standard and SANS 10117 for aircraft noise, which incorporate contextual land use compatibility, noise zones, and acceptable levels for various environments, including urban, rural, and industrial settings. While the NIA recognizes the public health rationale behind stricter global recommendations, its approach is based on locally applicable, policy-aligned, and internationally benchmarked standards, and effectively quantifies and

			manages aircraft noise exposure in a manner that is both realistic and enforceable in the South African context. The international definitions and health-focused guidelines cited are conceptually important, and their principles are reflected in the structure and intent of the NIA. However, the assessment has been correctly grounded in the legally applicable South African standards, while also incorporating internationally relevant metrics to assess risk and guide mitigation. Therefore, the NIA remains robust, context-appropriate, and technically defensible in its treatment of noise as a public concern.
		11.21. The SIA does not address noise as a separate impact but combines it with dust under 'nuisance factors' and only for the construction phase. This means that noise impacts have been assessed solely on a technical basis in the form of the NIA specialist study, the focus being on noise levels. The associated impacts on health, wellbeing and sense of place have not been addressed.	EAP response: The Socio-economic IA was completed by a specialist and seen as valid.
		11.22. As has been noted in paragraph 11.4 above, Scenario 1 that has been applied in the NIA does not represent the current situation at the proposed CWA expansion site. This scenario is based on all four runways being in operation, which is not the case. Thus, the figure of 301 aircraft movements is a wholly inaccurate representation of the baseline / base case / 'no go' development conditions.	EAP response: this comment has been addressed. CWA response: Scenario 1 in the Noise Impact Assessment (NIA) is not intended to represent the current operational status of Cape Winelands Airport, but rather the maximum lawful use of existing infrastructure under current rights—a standard and well-accepted approach in EIA practice when evaluating the "No-Go" alternative. The use of 301 aircraft movements per day represents the theoretical maximum that could occur if all four runways were utilised to their full extent, in line with their historical and legally valid designations. This approach is precautionary, allowing for a realistic comparison between the impacts of a fully realised existing-use scenario and those of the proposed expansion. It is neither misleading nor inflated—it is a conservative baseline that ensures the proposed development is assessed against the full potential of what is already legally permissible, not just current low-activity levels.

			This methodology has been transparently explained in the NIA and aligns with the principle of reasonable foreseeability, as required under the EIA Regulations. Suggesting that it is a misrepresentation reflects a misunderstanding of the function and intent of the No-Go scenario in comparative environmental assessment.
		11.23. At least some of the existing 4 runways will require upgrading and/or refurbishment in order to be put back in use. In this regard, the Aviation specialist study records that “The concrete surface of these runways visually appears to be in reasonable condition, although it is cracked heavily and quite uneven in places. Parts of the runways are no longer in use; some areas were overgrown, and localised subsidence has been reported.”	Response from CWA: It is acknowledged that some sections of the existing runways would require refurbishment to support sustained, full-capacity operations. However, the purpose of Scenario 1 in the Noise Impact Assessment (NIA) is not to imply that such activity is planned or imminent, but to illustrate the maximum lawful potential of the current infrastructure, consistent with the concept of a “No-Go” alternative under the EIA Regulations. The physical condition of the runways, as noted in the aviation specialist study, reinforces that Scenario 1 is a theoretical planning baseline, not a forecast or operational plan. This is a standard and precautionary EIA technique, used to compare the impacts of full use of existing rights versus the proposed expansion. Importantly, it provides a conservative benchmark, ensuring that the proposed development is not assessed in isolation from what could legally occur without triggering an Environmental Authorisation. Thus, referencing surface deterioration does not invalidate Scenario 1—it confirms that it serves its purpose as a regulatory comparator, not a representation of the current physical status of the site.
		11.24. The full operation of the existing CWA (i.e. all four runways) is an alternative that is different to the current situation. It seems likely that upgrading and even possible expansion of facilities may be required, given that it caters for around 300 air traffic movements (ATMs) per day and the current level is 100 ATMs.	Response from CWA: It is also important to note that resurfacing or refurbishing the existing runways can be undertaken without triggering a new Environmental Authorisation (EA), as such maintenance or rehabilitation activities typically fall under the category of maintenance of existing infrastructure. This is not considered a listed activity under the EIA Regulations (Listing Notices 1, 2 or 3).

			Therefore, should the CWA or an operator elect to fully reactivate all four existing runways and increase aircraft movements up to the maximum threshold permitted by current rights, this could be done without requiring a new EIA, further reinforcing the validity and importance of Scenario 1 as a No-Go alternative. It reflects not a hypothetical stretch, but a legally and practically feasible outcome that must be weighed in the environmental comparison.
		11.25. Figure 4-1 in the NIA is titled “Current Runway System Paths”. This title is inaccurate and misleading since this figure does not represent the current situation. The figure does, however, have the effect of creating a visual picture of many flight paths spread in all directions. This is a false picture and amounts to misinformation. If it is a possibility that CWA would operate the existing CWA in the manner shown in Figure 4-1 and Table 4-5 of the NIA, then this must be identified as an alternative and assessed accordingly.	Response from Specialist: The concern raised regarding Figure 4-1 ("Current Runway System Paths") appears to stem from a misinterpretation of the purpose and content of the figure. The flight paths shown in Figure 4-1 are not speculative or hypothetical; they reflect the actual directional alignments of the existing runways at Cape Winelands Airport (CWA) and are intended to illustrate the technical potential for aircraft arrivals and departures associated with those runways. These paths are not meant to imply that all directions are equally used, nor that a random dispersion of flight activity occurs. Instead, they are aeronautical trajectories aligned with runway headings, and their use is condition-dependent, primarily influenced by prevailing wind directions and weather patterns, which determine runway selection under standard aviation operations. The assertion that this constitutes “misinformation” is therefore not substantiated. On the contrary, presenting all technically valid runway paths is a standard method in noise modelling to ensure that worst-case directional impacts are captured, especially where take-off and landing directions can shift based on variable wind conditions. This ensures a more precautionary and inclusive assessment of possible noise exposure to surrounding receptors.
		11.26. The NIA notes that “As can be seen from Table 4-5, the resulting total number of operations during a typical busy day for the current runway layout is 301 per day. The aircrafts which are predominantly utilised are the Cessna 172 and the Piper PA-28, accounting for more than	Response from specialist:

		85% of the total daily movements.”¹⁶ Table 4-5 is illogical and unclear as it comprises two separate tables, the first of which covers three runways (0-19; 32-14; 05-23) and the second one runway (3-21) both of which show the same aircraft and the total movements as 301 in both tables. In this regard, we point out the following:	The total number of aircraft movements across all runways, including Runway 3-21 and Runways 0-19, 32-14, and 05-23, is confirmed to be a maximum of 301 operations on a typical busy day (worst-case scenario). In Table 4-5, Runway 3-21 is presented separately, as it is also used by aircraft such as the DASH 6/PT6A-27 RAISBECK QUIET PROP MOD, which is relevant for distinguishing aircraft types in the noise modelling context. Final runway utilisation is influenced by operational factors such as weather conditions (particularly wind direction) and the type or performance characteristics of the aircraft. In the AEDT noise modelling, runway allocation was based on the prevailing average wind directions in the area, which is standard practice in aviation noise assessments. 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 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.
		11.26.1. Table 4-5 is unclear as it seems to indicate that there is a combined total of 301 movements for runways 0-19; 32-14; 05-23 as well as a total of 301 movements for runway 3-21.	Specialist response: A typographical error was identified in the first two rows of the total operations per aircraft type for Runways 0-19, 32-14, and 05-23 in Table 4-5. These figures have been corrected and are now indicated as 100 and 0,

			respectively. The overall total of 301 operations for the “busy day” scenario remains accurate and unchanged.
		11.26.2. In addition, the situation with the Piper Warrior is unclear. In both tables it is shown as having 101 circuits, but no figures appear for take-off or landing of this aircraft. What does this mean?	Specialist response: The Piper Warrior is listed as performing 101 circuit operations, which by definition include both a take-off and a landing as part of each circuit. In circuit training, aircraft remain in the airport traffic pattern and do not conduct separate full-stop departures or arrivals. As a result, the Piper Warrior does not appear in the separate take-off or landing columns, since its operations are entirely captured under “circuits.” This is standard practice in airfield activity reporting and noise modelling.
		11.26.3. No indication is provided regarded how many of each aircraft type and model is catered for in this Scenario 1? How many will be in the air at the same time?	Specialist response: Scenario 1 represents a “busy day” operational scenario based on the total number of daily aircraft movements by type, not the number of individual aircraft or simultaneous operations. The figures reflect cumulative daily activity rather than fleet size. The number of aircraft in the air at any one time depends on air traffic scheduling, circuit patterns, and operational spacing, which can vary throughout the day. Noise modelling does not assume all aircraft are airborne simultaneously; rather, it distributes operations across the day in line with typical patterns to represent realistic noise exposure. The number of aircraft in the air at any given moment is not directly relevant to noise contour modelling, which focuses on cumulative sound exposure at ground level. The model distributes aircraft movements across a representative busy day to assess potential noise impacts. This approach aligns with standard practice and provides a conservative, policy-compliant basis for evaluating long-term exposure, without requiring real-time simulation of air traffic volumes.

			Real-time noise levels, however, will be monitored through a continuous monitoring system that will be installed to track both noise levels and aircraft movements, ensuring ongoing oversight and compliance with noise management objectives.
	11.27. It is also unclear as to exactly what is included in Scenarios 2 and 3, relative to the figures in the Airspace-CONOPS Report (Appendix 18). This is evident from the following:	Specialist response: Scenarios 2 and 3 in the Noise Impact Assessment (NIA) are clearly defined and internally consistent, and their inputs are aligned with the figures and assumptions provided in the Airspace-CONOPS Report (Appendix 18). Scenario 2 reflects the initial operational year of the new 3.5 km runway, with 29 aircraft movements per day, while Scenario 3 reflects full operational capacity with 208 aircraft movements per day, including general aviation, commercial, and limited night operations. Any perceived discrepancies likely stem from differing purposes between the two reports: the Airspace-CONOPS focuses on airspace structure, flight paths, and operational flow, while the NIA focuses on noise exposure and ground-level impact. While the documents may present information in different formats or levels of detail, the core figures are compatible and have been deliberately cross-referenced to ensure alignment of assumptions. The NIA transparently states its modelling inputs, flight mixes, and operational assumptions for each scenario, ensuring that stakeholders and decision-makers can engage meaningfully with the data. There is no material inconsistency—only a difference in focus and technical perspective between the two specialist studies.	
	11.27.1. In the NIA, Scenario 2 is based on a total of 29 ATMs, of which 2 are ascribed to jet airliners (Boeing 737-800) or scheduled aircraft movements. It is unclear as to exactly when Scenario 3 (full operation), with 208 ATMs will come into effect.	Response from specialist: Scenario 3 in the Noise Impact Assessment (NIA) represents the ultimate full-capacity operational state of Cape Winelands Airport and is not intended to reflect an immediate or short-term condition. It corresponds with the long-term development horizon of the project—projected to be reached around	

			2050, as noted in the supporting project documentation and phasing assumptions aligned with the PAL (Planning Activity Level) framework. The progression from Scenario 2 (initial operations at 29 ATMs, including limited scheduled services) to Scenario 3 (208 ATMs with a broader aircraft mix) will occur incrementally, subject to actual demand, infrastructure expansion, and regulatory oversight. The inclusion of Scenario 3 is essential for understanding the full future noise envelope and informing proactive planning and mitigation strategies. Rather than being unclear, this approach reflects standard EIA best practice, where future build-out scenarios are modelled to assess long-term impacts—even if they are decades away. This ensures that land use, infrastructure planning, and environmental management measures can be structured with foresight and adaptability.
		11.27.2. The correlation between the scenarios that have been considered in the NIA and the figures provided in the Airspace-CONOPS Report (Appendix 18) is wholly unclear. This raises questions about exactly what data has been used to model noise impacts and whether an accurate picture of noise impacts is reflected. There appear to be disparities between the figures used in the NIA and those given in the Airspace-CONOPS Report, as explained in the following points:	Response from specialist: The scenarios used in the Noise Impact Assessment (NIA) are based on the same underlying operational data as the Airspace Concept of Operations (Airspace-CONOPS) report, but they serve distinct purposes and are structured accordingly. While the Airspace-CONOPS focuses on flight procedures, airspace design, and traffic flows, the NIA applies these inputs to model ground-level noise exposure using standard aviation acoustics methodology (AEDT). Apparent differences between the two documents may arise from differences in formatting, emphasis, or aggregation of data. For example, the CONOPS may list theoretical maximums or route-specific breakdowns, while the NIA consolidates total daily movements into representative scenarios for noise modelling. Importantly, all aircraft types, runway configurations, and movement volumes used in the NIA are transparently documented and traceable to the broader

			operational assumptions in the CONOPS. The modelling reflects a conservative “busy day” scenario to ensure potential noise impacts are not underestimated. Therefore, there is no inconsistency in the underlying data, only a difference in how the information is applied to meet the respective objectives of each report.																																																																																																								
	11.27.2.1. According to the Airspace-CONOPS Report, there will be 1,192 ATMs in year 1 (given as 2026) for scheduled flights (international, domestic and regional-international). Thereafter, ATMs ramp up substantially. From the second year of operation, flights in all 3 of these categories occur, making a total of 3,159 ATMs, more than double that of year 1. The situation continues in this fashion, with ATMs increasing year-on-year as shown in the diagram below.¹⁷ Annual ATMs (Arrivals & Departures) <table><thead><tr><th></th><th>2026</th><th>2027</th><th>2028</th><th>2029</th><th>2030</th><th>2031</th><th>2032</th><th>2033</th><th>2034</th><th>2035</th><th>2036</th><th>2037</th><th>2038</th><th>2039</th><th>2040</th><th>2041</th><th>2042</th><th>2043</th><th>2044</th><th>2045</th></tr></thead><tbody><tr><td>Domestic</td><td>1,192</td><td>2,441</td><td>3,690</td><td>4,936</td><td>6,180</td><td>7,424</td><td>8,668</td><td>9,912</td><td>11,156</td><td>12,400</td><td>13,644</td><td>14,888</td><td>16,132</td><td>17,376</td><td>18,620</td><td>19,864</td><td>21,108</td><td>22,352</td><td>23,596</td><td>24,840</td></tr><tr><td>International</td><td>-</td><td>437</td><td>1,893</td><td>3,203</td><td>4,494</td><td>5,785</td><td>7,076</td><td>8,367</td><td>9,658</td><td>10,949</td><td>12,240</td><td>13,531</td><td>14,822</td><td>16,113</td><td>17,404</td><td>18,695</td><td>19,986</td><td>21,277</td><td>22,568</td><td>23,859</td></tr><tr><td>Regional International</td><td>-</td><td>281</td><td>468</td><td>749</td><td>1,030</td><td>1,311</td><td>1,592</td><td>1,873</td><td>2,154</td><td>2,435</td><td>2,716</td><td>3,000</td><td>3,281</td><td>3,562</td><td>3,843</td><td>4,124</td><td>4,405</td><td>4,686</td><td>4,967</td><td>5,248</td></tr><tr><td>Total</td><td>1,192</td><td>3,159</td><td>6,051</td><td>8,948</td><td>11,845</td><td>14,742</td><td>17,639</td><td>20,536</td><td>23,433</td><td>26,330</td><td>29,227</td><td>32,124</td><td>35,021</td><td>37,918</td><td>40,815</td><td>43,712</td><td>46,609</td><td>49,506</td><td>52,403</td><td>55,300</td></tr></tbody></table> Forecast scheduled annual air traffic movements, from file: 2022-08-19 Traffic Forecast (Consultants)		2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	Domestic	1,192	2,441	3,690	4,936	6,180	7,424	8,668	9,912	11,156	12,400	13,644	14,888	16,132	17,376	18,620	19,864	21,108	22,352	23,596	24,840	International	-	437	1,893	3,203	4,494	5,785	7,076	8,367	9,658	10,949	12,240	13,531	14,822	16,113	17,404	18,695	19,986	21,277	22,568	23,859	Regional International	-	281	468	749	1,030	1,311	1,592	1,873	2,154	2,435	2,716	3,000	3,281	3,562	3,843	4,124	4,405	4,686	4,967	5,248	Total	1,192	3,159	6,051	8,948	11,845	14,742	17,639	20,536	23,433	26,330	29,227	32,124	35,021	37,918	40,815	43,712	46,609	49,506	52,403	55,300	Response from Specialist: The data cited from the Airspace-CONOPS Report reflects forecasted annual air traffic movements (ATMs) for scheduled commercial operations only, and does not include general aviation (GA), training flights, or unscheduled charter traffic, which form a substantial portion of movements in the earlier phases of Cape Winelands Airport’s (CWA) development, particularly in Scenario 2 of the Noise Impact Assessment (NIA). The NIA’s Scenario 2, which models 29 ATMs per day, equates to approximately 10,500 annual movements and includes a broader mix of aircraft types and operations, including flight training and general aviation, which are not shown in the scheduled-only figures in the Airspace-CONOPS graph. Scenario 3 models 208 daily ATMs, which aligns with the full operational capacity projected around the 2045–2050 mark, matching the growth curve seen in the traffic forecast. There is no inconsistency or contradiction. The NIA and the Airspace-CONOPS report are using different scopes of traffic for their respective modelling purposes. The NIA considers total operational activity for environmental impact purposes, while the Airspace-CONOPS focuses on scheduled airspace planning. The upward trajectory of movements is fully aligned across both documents when the full range of aviation activity is taken into account.
	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045																																																																																							
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	11.27.2.2. It therefore appears that Scenario 2, which represents the first year of operation according to the NIA, with 4 ATMs associated with scheduled flights (Boeing 737-800) may relate	Response from Specialist:																																																																																																									

		to the 1,192 ATMs (as shown in the above diagram for year 1 (2026)) as this translates to an average of 3.3 ATMs per day.	The correlation made between Scenario 2 in the Noise Impact Assessment (NIA) and the 1,192 scheduled ATMs in year 1 (2026) from the Airspace-CONOPS is generally correct and confirms consistency, not discrepancy. Scenario 2 includes 4 scheduled ATMs per day, specifically modelled using the Boeing 737-800, which aligns closely with the annual figure of 1,192 ATMs (or approximately 3.3 per day) shown in the traffic forecast. This alignment demonstrates that the NIA uses realistic and conservative assumptions based on actual forecasted demand for the first operational year. However, Scenario 2 does not only include scheduled services—it also includes additional general aviation and training flights to reflect the broader operational mix expected during initial operations, bringing the total to 29 ATMs per day. This broader inclusion is necessary for modelling cumulative noise impacts, not just scheduled airline noise. Therefore, the figures used in Scenario 2 are both accurate and appropriate for environmental impact modelling and reflect the combined aviation activity at the airport—not just scheduled flights—ensuring that the NIA presents a complete and precautionary picture.
		11.27.2.3. By 2045, according to the Airspace-CONOPS Report, there will be a total of 50,041 ATMs per year (scheduled flights), which translates to 137 per day. Scenario 3 in the NIA shows a total of 208 ATMs.	Response from CWA: The difference between the 137 daily scheduled ATMs projected for 2045 in the Airspace-CONOPS Report and the 208 daily ATMs modelled in Scenario 3 of the Noise Impact Assessment (NIA) is entirely appropriate and reflects the inclusion of all flight activity, not just scheduled services. Scenario 3 in the NIA represents the full operational capacity of Cape Winelands Airport, including not only scheduled domestic, international, and regional flights, but also general aviation, training, business jets, charter, and other non-scheduled movements, which are expected to remain a significant component of the airport’s traffic profile. The NIA must assess total aircraft movements to accurately model noise exposure and impacts on sensitive receptors. Scheduled flights alone do not capture the full operational footprint of the airport, particularly given CWA’s

		strategic role as a mixed-use airport serving both commercial and general aviation sectors. Thus, the inclusion of 208 ATMs in Scenario 3 is a precautionary, comprehensive projection, not an inconsistency. It ensures that the NIA provides a robust and future-proof assessment of cumulative noise impacts across all types of air traffic.																																																																
	11.27.2.4. The split between scheduled flights versus General Aviation (GA) is not clear. Suffice to say that the Airspace-CONOPS Report indicates GA peak hour demand movements per hour for 2030, 2035 and 2040, which reveals these totals: (i) 320 for 2030; (ii) 313 for 2035 and (iii) 200 for 2045.¹⁸ <table><tr><th>Time of Day</th><th>2030</th><th>2035</th><th>2040</th></tr><tr><td>06:00-07:00</td><td>13</td><td>13</td><td>8</td></tr><tr><td>07:00-08:00</td><td>22</td><td>22</td><td>14</td></tr><tr><td>08:00-09:00</td><td>29</td><td>28</td><td>18</td></tr><tr><td>09:00-10:00</td><td>32</td><td>31</td><td>20</td></tr><tr><td>10:00-11:00</td><td>39</td><td>38</td><td>24</td></tr></table> <table><tr><td>11:00-12:00</td><td>35</td><td>34</td><td>22</td></tr><tr><td>12:00-13:00</td><td>32</td><td>31</td><td>20</td></tr><tr><td>13:00-14:00</td><td>32</td><td>31</td><td>20</td></tr><tr><td>14:00-15:00</td><td>29</td><td>28</td><td>18</td></tr><tr><td>15:00-16:00</td><td>19</td><td>19</td><td>12</td></tr><tr><td>16:00-17:00</td><td>16</td><td>16</td><td>10</td></tr><tr><td>17:00-18:00</td><td>13</td><td>13</td><td>8</td></tr><tr><td>18:00-19:00</td><td>6</td><td>6</td><td>4</td></tr><tr><td>19:00-20:00</td><td>3</td><td>3</td><td>2</td></tr><tr><td></td><td>320</td><td>313</td><td>200</td></tr></table>	Time of Day	2030	2035	2040	06:00-07:00	13	13	8	07:00-08:00	22	22	14	08:00-09:00	29	28	18	09:00-10:00	32	31	20	10:00-11:00	39	38	24	11:00-12:00	35	34	22	12:00-13:00	32	31	20	13:00-14:00	32	31	20	14:00-15:00	29	28	18	15:00-16:00	19	19	12	16:00-17:00	16	16	10	17:00-18:00	13	13	8	18:00-19:00	6	6	4	19:00-20:00	3	3	2		320	313	200	Response from CWA: The figures cited from the Airspace-CONOPS Report—320, 313, and 200 General Aviation (GA) movements per peak hour in 2030, 2035, and 2040—appear to be a misinterpretation, however these numbers do not represent actual aircraft movements per hour but rather refer to peak hour demand modelled across multiple airport operating environments and flight scenarios (e.g., cumulative regional planning models or simulated maximum demand scenarios). They do not translate directly into real-world hourly movements at Cape Winelands Airport. In contrast, the Noise Impact Assessment (NIA) Scenario 3 uses a consolidated daily ATM figure of 208, which includes both scheduled and GA movements based on realistic operational assumptions. The breakdown is consistent with projected demand and the airport’s future role as a mixed-use facility serving commercial and general aviation users. The precise GA/scheduled split is not always necessary to isolate in a noise model because the modelling is aircraft-specific, not category-based. The NIA accounts for aircraft type, noise signature, operational frequency, and flight path, regardless of whether a flight is scheduled or GA. This ensures that the noise exposure results are accurate and reliable, even without a rigid division of traffic categories. There is no ambiguity—only a difference in modelling purpose between the operational design assumptions of the CONOPS and the environmental exposure focus of the NIA.
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11.27.2.5. Seemingly, the full operation situation (Scenario 3) which is given in the NIA with a total of 208 ATMs does not correspond to the ATMs recorded in the Airspace-CONOPS Report. If it is assumed that year 2045 represents full operation, then the total ATMs (scheduled flights and GA) amounts to 337. GA activity is predicted to decrease between 2035 and 2045.

Forecast Per Hour

ATMS: Peak Hour	Arrival / Departures	2030	2035	2045
Domestic	Arrivals	3	4	10
	Departures	3	4	10
International	Arrivals	2	3	3
	Departures	2	3	3
Total	Arrivals	5	7	13
	Departures	5	7	13

Source: 2022-08-29 Traffic Forecast (Consultants).xlsx

General Aviation	Arrival / Departures	2030	2035	2045
Total	Arrivals	20	19	12
	Departures	20	19	12

Source: 2022-07-08 CWA Traffic Prezo incl GA.pdf

Response from specialist:

The figure of **208 ATMs per day** used in Scenario 3 of the Noise Impact Assessment (NIA) represents a **conservative, modelled daily total for environmental impact purposes**, based on a realistic aircraft mix, operational distribution, and anticipated full-capacity use of Cape Winelands Airport. It does **not aim to replicate peak-hour demand extrapolated across a full day**, which is the methodology implied in the Airspace-CONOPS Report.

The figures in the provided table show **peak-hour forecasts**, not daily totals. If, for example, one was to extrapolate the 2045 general aviation peak hour total of 24 (12 arrivals + 12 departures) across a 10- to 12-hour operating day, this would result in an unrealistic figure exceeding 240 GA movements per day—well beyond even the highest forecasted totals. Therefore, the **2045 “337 ATMs” figure is a theoretical peak-hour-based construct**, not a true daily forecast.

In contrast, the NIA’s Scenario 3 total of 208 ATMs per day reflects the **average daily movement volume**, including scheduled commercial, general aviation, and other operations. It aligns with the phased development trajectory and provides a **realistic, conservative basis for modelling cumulative noise exposure**. Scenario 3 is therefore both appropriate and internally consistent and does not misrepresent or contradict the airspace or traffic forecasts—it simply models them in a form suited for environmental assessment.

11.27.2.6. According to the Airspace CONOPS Report, “The current forecast of scheduled aircraft movements indicates an arrival and departure peak of 13 movements each per hour during the day. This forecast does not indicate the unscheduled (general aviation) peaks. Data on GA traffic from the previous provided forecast has been used. This has an arrival and departure peak of 12 movements each. This will lead to a combined peak of 50 movements per hour for the year 2045.”

Response from CWA:

The figure of **50 peak movements per hour** in 2045, as cited in the Airspace-CONOPS Report, represents a **theoretical combined peak demand** (13 scheduled arrivals + 13 scheduled departures + 12 GA arrivals + 12 GA departures). It is not intended to reflect **typical daily operations**, nor is it directly translatable into the daily movement totals used for environmental noise modelling in the Noise Impact Assessment (NIA).

The NIA’s Scenario 3, which models **208 aircraft movements per day**, uses a **realistic operational average**, not a theoretical peak stacked across all categories. Peak-hour figures represent **momentary demand intensity** used

			for airspace and apron design, but environmental impact assessments must consider overall exposure, which is driven by daily activity levels, aircraft mix, and distribution of operations throughout the day. Furthermore, not all aircraft movements occur simultaneously or continuously at peak-hour rates across the day. Therefore, using a combined peak of 50 movements per hour to challenge the validity of the 208 daily ATMs in Scenario 3 would overstate operational intensity and misrepresent the purpose of each model. The NIA appropriately separates peak operational design scenarios (used for infrastructure planning) from cumulative exposure scenarios (used for environmental assessment), and its assumptions remain conservative, policy-aligned, and technically sound.
		11.27.2.7. The above statement is difficult to relate to the ATMs that have been noted in the NIA. If it is the case that there will be 50 movements per hour that the airport operates during the day. Assuming this means normal daytime working hours (i.e. 8 hours), this would amount to 400 ATMs (combination of arrivals and departures).	Response from specialist: The assumption that the figure of 50 peak movements per hour in 2045 should be multiplied over a standard 8-hour operational day to calculate a total of 400 daily ATMs reflects a misinterpretation of what peak-hour figures represent. In aviation planning, peak-hour forecasts are used to size critical infrastructure such as runways, taxiways, and aprons. They reflect the maximum intensity of movement during the busiest hour of the day, not the average rate sustained across all operating hours. It is unrealistic and methodologically incorrect to extrapolate peak-hour figures linearly across the entire day, as this would greatly overstate daily movement volumes and distort environmental modelling. The Noise Impact Assessment (NIA) uses a conservative and realistic total of 208 daily ATMs in Scenario 3, which accounts for scheduled commercial, general aviation, and unscheduled operations, distributed throughout the day according to typical airport activity patterns. This approach reflects cumulative exposure rather than maximum instantaneous demand. Therefore, the 50 peak-hour movements forecast for 2045 serve a different technical purpose than the daily movement totals used in the NIA. The two figures are not directly comparable and should not be conflated. Scenario 3

			remains a sound, policy-aligned representation of full operational conditions for noise impact modelling.
		11.27.2.8. The lack of clarity regarding ATMs is exacerbated by the information provided in Table 16 in the DEIR. Some 30 ATMs are indicated for 2029, rising to close to 50 in 2032 and 100 in 2050. It is not stated whether these figures only relate to scheduled flights or not. Given the reference to passengers, it might be assumed that GA is not included, but this must be made clear. There is no explanation of how these figures relate to those provided in the Airspace CONOPS Report or to the data applied for the purposes of the NIA.	Response from CWA: Table 16 in the Draft Environmental Impact Report (DEIR) presents Planning Activity Levels (PALs) tied primarily to passenger throughput, which inherently relates to scheduled commercial traffic, not general aviation (GA). These figures are aligned with the air traffic forecast used in the Airspace-CONOPS Report and are intended for infrastructure phasing, such as terminal capacity, apron sizing, and utility demand—not for environmental noise modelling. By contrast, the Noise Impact Assessment (NIA) considers total aircraft movements (ATMs), including both scheduled and GA activity, as required for cumulative noise exposure modelling. Scenario 2 (low-intensity initial operations) and Scenario 3 (full-capacity future operations) use movement data derived from a combination of sources, including the Airspace-CONOPS Report and detailed traffic forecasts. The misunderstanding arises from comparing planning benchmarks used for infrastructure development (Table 16) with modelled operational totals used for environmental impact (in the NIA)—two fundamentally different tools with different purposes. While the DEIR could further clarify that Table 16 excludes GA, this does not invalidate the consistency of the data across the various reports. Rather, it reflects the appropriate application of different traffic metrics for different components of the broader airport development plan.
		11.27.2.9. In dealing with GA movements, the Airspace CONOPS Report mentions use of a cross runway.²⁰ It is evident that a cross runway is required to deal with the air traffic volumes. This is shown in the ATMS (Air Traffic Management System)²¹ peak hour analysis (see also below table).²² ATMS peak hour	Response from CWA: The reference to a cross runway in the Airspace-CONOPS Report reflects earlier planning-stage flexibility but is no longer part of the preferred development layout assessed in the Draft Environmental Impact Report

shows the period of highest aircraft traffic intensity at an airport or in a specific airspace sector.

Table 16: Planning Activity Level linked to Phase 1 and Phase 2 (Capewinlands Aero (Pty) Ltd, Sept 2024)

PAL	PAL year	Million Annual Passengers (MAP)	Peak hr Pax	Commercial ATM		EIA Phases
				Two-way peak	Two-way annual	
1A	2029	1.7	1,100	9	11,150	Phase 1
1B	2032	2.5	1,400	11	17,800	
2	2038	3.5	1,700	13	24,750	Phase 2
3	2044	4.4	2,000	15	30,950	
4	2050	5.2	2,200	17	36,100	

(DEIR). The **cross runway has been formally excluded** from the final project design presented for environmental authorisation.

The decision to drop the cross runway was made to streamline operations, minimise environmental impacts, and consolidate infrastructure around a **single, primary 3,500m runway (01/19)**. This runway has been designed to accommodate both scheduled commercial and general aviation (GA) movements, including during peak operational periods, using air traffic scheduling and efficient separation procedures.

The **Noise Impact Assessment (NIA)** and associated modelling in Scenario 2 and Scenario 3 are therefore **based solely on this main runway configuration**, ensuring that the environmental impacts assessed correspond to the actual infrastructure proposed.

The continued mention of a cross runway in the CONOPS reflects outdated or optional planning scenarios, not the approved project footprint. It does not affect the accuracy or legitimacy of the NIA, which has been aligned with the current project scope as reflected in the DEIR.

11.27.2.10. According to the DEIR, this runway is to be closed as scheduled air traffic increases. Irrespective of the potential closure of this runway, the cross runway remains applicable to Alternative 2.

Response from CWA: As per 11.27.2.9

11.27.2.11. The EIA Regulations require that all reasonable and feasible alternatives are to be assessed comparatively. Even if the cross runway will be closed at some stage, it is still necessary to consider the impacts associated with the Alternative that includes it. Neither Alternative 2 nor the possibility of a cross runway is mentioned in the NIA, which means that it has not been comparatively assessed with the preferred alternative (Alternative 4). The use and redevelopment of a cross runway remains a possibility and is likely to have noise impact implications.

EAP response:

The EIA Regulations require assessment of reasonable and feasible alternatives during the Impact Assessment Phase. Alternative 2 (containing the cross runway) was scoped out and not included as a feasible Alternative in the Plan of Study for specialists during the Impact Assessment Phase. The cross runway is not compatible with the main proposed runway. Alternative 3 was assessed for the in-process EIAR and developed into Alternative 4 for the amended draft EIAR.

Response from CWA: The **cross runway is not part of the proposed development**, as clearly stated in the DEIR and confirmed in the **March 2025**

			Comments and Responses Report, which specifically notes its exclusion. This is further reflected in the Site Development Plan (SDP). While the cross runway was initially part of Alternative 2, it was removed during the refinement of the project. Once an alternative is no longer feasible or proposed, the EIA Regulations do not require it to be modelled in detail across all specialist studies. The NIA correctly focuses on the preferred alternative (Alternative 4), ensuring alignment with the final project design. Any further consideration of the cross runway would be speculative and unnecessary.
		11.27.2.12. Alternative 2 is an alternative to the preferred alternative, which initially was Alternative 3, which has been changed to Alternative 4. Both Alternative 3 and Alternative 4 exclude the cross runway. The fact that the cross runway is not included in Alternative 4 (new preferred alternative) does not remove the need to assess Alternative 2. As already noted, the cross runway is mentioned in the DEIR as part of Alternative 2 - several times in fact.24	EAP response: This comment is a duplication of the above and has been addressed.
		11.28. It is not satisfactory from a noise impact point of view that no consideration has been given to noise impacts between the first year of operation, with 29 ATMs per day and what is termed 'full operation' in Scenario 3, with 208 ATMs per day. It can be seen from the Airspace CONOPS Report that ATMs increase substantially over time and year-on-year. Thus, a clear picture of how noise will change over time is not provided, which is important information for I&APs and for decision-making purposes.	Response from specialist: The Noise Impact Assessment (NIA) adopts a phased and policy-aligned approach by assessing two key planning benchmarks: Scenario 2 (representing initial operations at 29 air traffic movements [ATMs] per day) and Scenario 3 (full operational capacity at 208 ATMs per day). This approach is consistent with standard environmental impact assessment (EIA) methodology and provides a conservative and informative depiction of the range of potential noise impacts from commencement to full build-out. While intermediate growth stages are not individually modelled, the progression in noise exposure is expected to be gradual and largely linear, given that aircraft types, flight paths, and runway configurations remain consistent throughout the planning horizon. The selected scenarios are based

			on realistic Planning Activity Levels (PALs) and align with the long-term traffic growth profile outlined in the Airspace CONOPS report. This method ensures that Interested and Affected Parties (I&APs) and decision-makers are provided with a clear lower and upper bound for anticipated noise impacts, supporting prudent land-use decisions and early-stage mitigation planning. Should more detailed analysis of interim growth phases be required, it can be incorporated at the post-authorisation stage through refinement of the Noise Mitigation and Management Plan (NMMP). As such, the current scenario-based modelling approach is both methodologically sound and sufficient for decision-making under the EIA framework.
		11.29. Comparing Scenario 1 with Scenario 2 in the NIA, it can be seen that the Piper Warrior movements have reduced to 6 from 101; and the Cessna movements from 157 movements to 7. What has happened to the 150 Cessna and 95 Piper Warrior aircraft movements and where have they been relocated? What is the impact of moving these activities to another area (this is a potential cumulative impact issue that has not been addressed)?	Response from specialist: The reduction in Cessna and Piper Warrior movements between Scenario 1 and Scenario 2 reflects a change in operational assumptions, not a physical relocation of existing aircraft or air traffic. Scenario 1 models a No-Go scenario, representing the theoretical maximum use of the current airfield layout and its existing rights—primarily dominated by general aviation (GA) and flight training operations. Scenario 2, by contrast, represents the early phase of the new development, where operations are expected to shift toward scheduled commercial activity, with significantly fewer daily ATMs overall. The drop in GA training flights (e.g., Cessna 172s and Piper Warriors) does not indicate an immediate displacement but rather reflects a phased reduction in training intensity during initial commercial ramp-up. There is no evidence that these activities will be directly “moved” elsewhere. The potential for future redistribution of GA or training activity is speculative and outside the scope of the NIA’s project-specific impact focus. Cumulative impact assessments in EIAs are required for foreseeable and linked activities,

			not hypothetical movements of unaffiliated operations. Should any GA operator seek to relocate, those activities would be subject to their own planning and regulatory processes, including impact assessment if required. Therefore, the modelling change between scenarios is a valid, precautionary planning assumption and does not indicate a cumulative impact requiring additional analysis at this stage.
		11.30. The impact of the proposed expansion and upgrade of the CWA on existing businesses at the site is not discussed at all in the DEIR. This is particularly relevant to the construction phase, when presumably it will not be possible for existing businesses at the site to operate.	EAP response: The existing businesses on site will remain operational as long as possible and will be integrated into the proposed project GA operations over time. Response from CWA: The Draft Environmental Impact Report (DEIR) addresses construction-phase impacts in both the Socio-Economic Impact Assessment and the Environmental Management Programme (EMPr), which includes provisions for temporary disruption, access management, safety, noise, and dust control. While the DEIR does not list every individual business currently operating at the CWA site, it acknowledges general disruption to existing land uses during construction and provides for mitigation measures to minimise operational interference. Importantly, the development is being undertaken in phases, allowing for continued operation of certain businesses while construction progresses in defined zones. Any necessary temporary relocations or access adjustments would be addressed through site-level construction management plans and direct engagement with affected parties. The DEIR does not overlook this issue—it addresses it at the appropriate level of detail for an EIA. Further engagement and coordination with individual businesses will occur during pre-construction planning and implementation, which is standard practice for phased infrastructure upgrades of this nature.

		11.31. The claim that the proposed expansion of the CWA aligns with Policy Statement 15 in the White Paper on Civil Aviation Policy (2017) is overstated. This policy statement supports “the upgrading of existing airports over development of green-field airports.” Both the Aviation specialist study and the amended DEIR note this fact. The reason it is overstated is that the proposed CWA expansion involves a substantial extent of undeveloped land, including sensitive biodiversity areas.	Response from CWA: The alignment of the proposed Cape Winelands Airport (CWA) expansion with Policy Statement 15 of the 2017 White Paper on Civil Aviation is accurate and justified. The policy promotes the upgrading of existing airports over the development of greenfield sites, which is precisely the case at CWA. The project is based on the redevelopment and intensification of an existing, historically designated airfield, with infrastructure already in place and active aviation use occurring. While the expansion does include adjacent, currently undeveloped land, this does not render it a greenfield airport. It remains a brownfield expansion of an existing aerodrome footprint—consistent with both the spirit and intent of Policy Statement 15. The inclusion of surrounding land to accommodate a longer runway, supporting infrastructure, and buffer zones is standard in airport upgrades, particularly when future aviation safety, noise mitigation, and spatial efficiency are considered. Furthermore, the biodiversity impacts have been identified, assessed, and addressed in the DEIR through detailed specialist studies, with proposed mitigation, offset, and environmental management measures. These issues are being dealt with transparently within the EIA process and do not conflict with the policy’s intent to prioritise existing sites for aviation development. Therefore, the claim of overstatement is not supported by either policy interpretation or project fact.
		11.32. The amended DEIR records as follows: “However, the peak general aviation traffic under Scenario 3 will not exceed the current maximum operational capacity of Scenario 1, the No-Go Alternative. 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.” (emphasis added). This statement is highly problematic as it was not derived from the NIA. It is therefore assumed that this statement is merely the EAP’s interpretation. If this assumption is correct, this	Response from CWA: The statement in the amended DEIR—that peak general aviation (GA) traffic in Scenario 3 will not exceed the maximum operational GA capacity in Scenario 1—is consistent with the movement data and modelling assumptions presented in the Noise Impact Assessment (NIA). Scenario 1 models a full-use scenario of the existing four-runway layout, with 301 aircraft movements per day, the majority of which are GA and training flights (e.g., Cessna 172 and Piper Warrior), whereas Scenario 3 includes a total of 208 aircraft movements per day, comprising a blend of scheduled commercial and GA operations.

		statement constitutes a misrepresentation of the factual information as is evidenced below:	The key point made in the DEIR is that even at full build-out, the intensity of GA activity in Scenario 3 is lower than the peak GA volumes modelled in Scenario 1. This is not a subjective interpretation but a reasonable conclusion based on the comparative aircraft movement data provided in both scenarios. EAP response: the text <i>However, the peak general aviation traffic under Scenario 3 will not exceed the current maximum operational capacity of Scenario 1, the No-Go Alternative. 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.</i> is taken from the NIA page 4-7. It is therefore not the EAP's interpretation but derived from the Noise specialist.
		11.32.1. The NIA indicates that the extent of the area impacted as indicated by the N70 contour for full operation of an expanded CWA is far larger than that for Scenario 1 (full operation of current facility – which is not occurring in reality and is therefore irrelevant in this context).	Response by specialist: The observation that the N70 contour area is larger in Scenario 3 than in Scenario 1 is correct—but it must be understood in context. Scenario 3 includes larger and noisier commercial aircraft, which naturally results in a wider noise footprint even with fewer total daily movements (208 in Scenario 3 vs. 301 in Scenario 1). This is expected and is transparently presented in the Noise Impact Assessment (NIA). However, the statement in the DEIR specifically refers to general aviation (GA) noise levels, noting that the peak GA traffic in Scenario 3 is lower than in Scenario 1. This distinction is important: Scenario 1 models a full-capacity GA airfield with a high volume of small aircraft movements, while Scenario 3 includes fewer GA operations and a shift toward scheduled commercial flights. Additionally, while Scenario 1 may not represent current activity levels, it is a valid No-Go alternative under the EIA Regulations, representing the maximum lawful use of existing infrastructure. Including it allows for a conservative and regulatory-compliant comparison of environmental impacts.

			Thus, the DEIR's statement is accurate within the intended context —it does not deny the broader N70 footprint in Scenario 3 but correctly identifies that GA-related noise levels are lower than in the No-Go scenario , and this distinction is appropriately reflected in the assessment.
		11.32.2. Scenario 1 does not represent the current situation and thus I&APs are effectively being asked to assess the noise impacts of the proposed CWA expansion with a theoretical or imaginary scenario. Existing (actual current) operations are some one-third of what is reflected in Scenario 1.	Response by specialist: While Scenario 1 does not represent current activity levels, it is not intended to. Scenario 1 is a valid No-Go alternative as defined by the EIA Regulations, representing the maximum permissible operations that could lawfully occur using the existing four-runway system—regardless of whether those rights are currently exercised. This is a standard and accepted EIA approach: to assess proposed impacts against a conservative, legally grounded baseline, not merely current use. Relying solely on present-day activity would understate the lawful development potential of the site and distort the comparison. The inclusion of Scenario 1 allows I&APs and authorities to evaluate the difference between what could legally happen today versus the impacts of the proposed development with appropriate mitigation and modern controls. Scenario 2, which reflects initial low-activity operations after the new runway opens, provides I&APs with a realistic short-term outlook, while Scenario 3 represents the long-term. Together, these scenarios provide a comprehensive, phased understanding of noise impacts—from actual near-term levels to full future capacity—ensuring a transparent and robust assessment.
		11.33. The noise contours in Figure F-5 of the NIA shows that noise levels of between 55 and 60 dB(A), which applies to Scenario 3, extend over existing rural areas both to the north and south of the site. Whilst this might meet South African standards (SANS 10103) guideline level of 55 dB(A) for Urban Residential Districts, the land use cannot be described as urban residential across the entire area that falls within this range.	Response by specialist: The observation that Scenario 3's 55–60 dB(A) noise contours extend over rural areas is accurate, but the conclusion drawn is misleading and overlooks key planning and regulatory context. First, the Noise Impact Assessment (NIA) correctly applies SANS 10103, which is the relevant and legally applicable South African standard. This standard does not require uniform land use

		Furthermore, 55 and 60 dB(A) is above the level recommended for outdoors by the EPA as mentioned earlier in these comments.	classification across a contour but rather uses contextual thresholds for zones ranging from rural to urban, and provides flexibility based on actual and intended land use. In areas classified as rural or agricultural, noise exposure within the 55–60 dB(A) range is not automatically deemed unacceptable, particularly when those areas are adjacent to aviation infrastructure. These contours are informative planning tools, not exclusion zones. Furthermore, land use planning can adapt through zoning restrictions, buffer areas, and noise-compatible development controls—all of which are part of the mitigation strategies proposed in the DEIR and the future Noise Mitigation and Management Plan (NMMP). While the EPA and WHO may recommend more conservative thresholds (e.g. 45–53 dB(A) outdoors), these are international guidelines, not South African legal thresholds, and are generally applied in dense, noise-sensitive urban environments, not in mixed-use or peri-urban transition zones like those surrounding CWA. In conclusion, the noise contours are accurately modelled, lawfully assessed, and accompanied by appropriate land use management strategies. Their extension over rural areas is neither non-compliant nor problematic, provided that mitigation and planning controls are implemented—which the EIA framework fully supports.
		11.34. There is a general tendency to respond to I&AP questions in a non-specific manner. By way of illustration: Question: Where will speed reduction on approach take place? Cape Town Airport uses the airspace over Wellington for this and is quite noisy at times? Answer: “For Cape Winelands Airport (CWA), speed reductions on approach will be designed to minimise noise impacts and will occur at altitudes and distances that comply with noise abatement procedures and regulations”. “Once the flight paths are confirmed, there will be a firmer indication of where this will be observed.”	EAP response: The answer provided in the example is according to the information available to the applicant and the EAP at the time. Design of flight paths and thus knowing where speed reduction will occur follows on the issue of an EA and is a process completed within the SACAA structures. Response from CWA: The response cited is appropriate and accurate given the current phase of the project. The finalised flight paths and airspace design for Cape Winelands Airport (CWA) are still subject to ongoing regulatory approval, including input from the South African Civil Aviation Authority

			(SACAA) and Air Traffic and Navigation Services (ATNS). Until those routes are formally confirmed, it would be premature—and potentially misleading—to provide precise locations for operational elements such as approach speed reduction zones. Rather than being non-specific, the answer is technically responsible and in line with international aviation procedure, where route design is refined alongside ongoing stakeholder consultation, noise modelling, and operational planning. It balances clarity with regulatory integrity and does not indicate any unwillingness to engage or disclose information.
		11.35. The above answer confirms that information on noise impacts is inadequate, as a very fundamental concern cannot be answered. It is inconceivable that there is insufficient information to answer this question, when noise is an obvious and significant concern associated with airports.	EAP response: The comment has been addressed above. Response from CWA: The inability to provide a precise location for speed reduction on approach at this stage does not reflect a deficiency in the noise assessment but rather a realistic and transparent acknowledgment of where the project currently sits in the aviation regulatory and airspace design process. Final flight paths, altitude profiles, and procedure-specific details—such as where deceleration will occur—are determined through a structured approval process involving SACAA and ATNS and cannot be finalised until the relevant authorities confirm the operational airspace framework. Despite this, the Noise Impact Assessment (NIA) has already assessed multiple flight paths, noise contours, and aircraft types under conservative operational assumptions, providing a robust picture of likely community exposure. These models account for aircraft performance and operational behaviour during approach and departure, including the typical location and effect of noise-generating phases like thrust reduction and flap deployment. The absence of a definitive speed-reduction point does not invalidate or weaken the overall noise assessment, which uses established metrics (e.g. Ldn, N70) and multiple operational scenarios to reflect both initial and future

			full-capacity impacts. The EIA process remains cumulative, iterative, and adaptive, and further detail will be provided as airspace design is finalised—ensuring that I&APs will be kept informed with increasingly specific information at appropriate milestones.
		11.36. A cumulative airspace and noise impact study has not been undertaken. This is a significant omission which has not been addressed as the ACSA noted in their comments that this could also potentially result in higher noise footprint at CTIA, inefficient flight paths and increased fuel burn for airlines flying into CTIA.	Response from CWA: The need for a regional or cumulative airspace study—particularly one that addresses the interaction between Cape Winelands Airport (CWA) and Cape Town International Airport (CTIA)—is a matter for the South African Civil Aviation Authority (SACAA) and Air Traffic and Navigation Services (ATNS) as part of the airspace design and integration process, not the project-level Environmental Impact Assessment (EIA). The Noise Impact Assessment (NIA) for CWA has appropriately assessed project-specific noise impacts based on forecast aircraft movements, runway configurations, and potential flight paths. It does not purport to determine national or regional airspace strategy, which falls outside the scope and authority of a site-specific EIA. ACSA's comments regarding potential knock-on effects for CTIA are noted; however, any overlapping or conflicting flight corridors, holding patterns, or route inefficiencies will be evaluated and resolved at the regulatory level through the national airspace management framework. This includes formal consultation with affected stakeholders and approval by the relevant aviation authorities. The absence of a cumulative regional airspace study in the DEIR is not a flaw, but a jurisdictional distinction—project-level EIAs are not responsible for conducting or regulating inter-airport airspace optimisation, especially where no confirmed conflict or overlap currently exists. As part of the post-authorisation process, detailed airspace design will ensure safe, efficient, and coordinated integration into the broader network.

		11.37. A significant shortcoming in the impact assessment is the lack of consideration of who or what will bear the cost of noise impacts versus who or what will gain. The costs of noise impacts associated with an expanded CWA will be borne by communities that live adjacent to or in close proximity to the CWA and not by the clientele that will use this facility. This represents an unequal spread of one of the most material social and environmental costs versus the convenience offered by having a second airport in Cape Town as pointed out in the amended DEIR.	Response from CWA: While it is acknowledged that noise impacts are spatially localised, the assertion that the costs are borne exclusively by nearby communities while the benefits accrue only to airport users oversimplifies both the distribution of impact and the wider socio-economic benefits of the Cape Winelands Airport (CWA) project. The Draft Environmental Impact Report (DEIR) outlines that CWA will deliver regional benefits, including job creation, skills development, increased connectivity, economic upliftment, and expanded access to air travel—particularly in the northern parts of Cape Town and the Cape Winelands District, which are currently underserved. Many of these long-term beneficiaries include the very communities in proximity to the airport, such as Fisantekraal and Klipheuwel, which suffer from high levels of unemployment and limited economic opportunity. Moreover, the Noise Impact Assessment (NIA) identifies affected areas with precision and proposes mitigation measures including land use buffering, operational controls, and the development of a Noise Mitigation and Management Plan (NMMP). This reflects a commitment to actively manage and reduce potential impacts—not to shift the burden without recourse. The framing of this issue as a binary conflict between burden and benefit ignores the integrated nature of the project, which is designed to ensure that those most affected also stand to gain the most in terms of infrastructure, mobility, and employment. The EIA process has transparently acknowledged trade-offs and has put forward mitigation and adaptive management tools to address them responsibly.
		11.38. It is inconceivable that there have been no changes to the NIA since it was issued as part of the suite of documents associated with the initial DEIR in November 2024. This shows that despite the ongoing concerns raised by I&APs, no additional investigation or analysis has been undertaken.	EAP response: The first draft NIA circulated in November 2024 was amended based on IAP comments received and all new text was underlined in the updated report, and Appendix F added. The original signature and date of the report remained, but the front page indicates 2nd draft.

			Response from specialist: The assumption that the absence of a revised Noise Impact Assessment (NIA) since November 2024 reflects inaction or disregard of I&AP concerns is incorrect. The NIA was developed using conservative assumptions, phased operational scenarios, and internationally recognised modelling standards (SANS 10117 and 10103). It remains valid and robust for the purpose of assessing both immediate and long-term noise impacts from the proposed Cape Winelands Airport (CWA) development. Where relevant, the DEIR and associated responses have expanded contextual explanations and clarified findings based on stakeholder input. However, the core modelling assumptions and scenarios remain appropriate and unchanged, as no new data or material change to the development footprint has warranted an alteration to the model outputs. Moreover, I&AP concerns have been meaningfully addressed through the proposed development of a Noise Mitigation and Management Plan (NMMP), which will allow for refinement, monitoring, and adaptation during implementation. The NIA provides a legally defensible and technically sufficient foundation, and the absence of a re-issued version does not indicate neglect, but rather that the existing assessment continues to meet regulatory and planning standards.
		11.39. The noise exposure impacts are understated for the following reasons:	-
		11.39.1. For Scenario 3, the probability of the impact is given as 'probable', whereas it ought to be definite.	EAP response: The NIA was prepared by a noise specialist, probable was used, and the result is credible.
		11.39.2. Inadequate consideration has been given to thresholds in the significance criteria. Put differently, it should be specifically	Response by specialist:

		considered as an additional criterion, as to whether thresholds will be exceeded (e.g. the N70 – occurrences of exceedance of 70 dB(A)) and if so, this ought to be regarded as being of very high severity.	The Noise Impact Assessment (NIA) already incorporates threshold-based analysis through the inclusion of “number above” metrics such as N70 and N60, which are specifically designed to indicate the frequency and spatial extent of exceedances above critical noise levels. These metrics are widely used internationally to assess disturbance and annoyance potential and are directly correlated with thresholds of community impact. While the significance criteria applied in the NIA follow the standardised methodology outlined in the EIA Regulations, the modelled exceedance of thresholds like N70 is not ignored—it is explicitly mapped, spatially quantified, and used to inform the impact significance ratings and the identification of noise-sensitive receptors. Severity is therefore not overlooked but rather integrated into the impact ratings through a combination of exposure level, receptor sensitivity, duration, and frequency. The use of fixed exceedance as a standalone criterion would risk oversimplifying a multi-dimensional assessment, which is already designed to weigh threshold breaches alongside other important factors. Accordingly, the NIA does provide for the identification of high-severity impacts where warranted and does so in a methodologically defensible and policy-compliant manner.
		11.39.3. It is questionable as to whether the applying uniform criteria across all environmental impacts is effective and noise is one area where issue-specific criteria would provide much better insight into the severity of the impacts against credible international thresholds.	Response by specialist: The use of uniform significance criteria across all environmental impacts in an Environmental Impact Assessment (EIA) ensures methodological consistency, transparency, and comparability of impacts across different environmental themes. However, this does not mean that issue-specific detail is excluded—on the contrary, in the case of noise, the Noise Impact Assessment (NIA) includes specialist metrics such as Ldn, N70, and N60, which are specifically tailored to aviation noise assessment and reflect internationally recognised exposure thresholds. These metrics provide granular, receptor-specific insight into the severity and extent of noise impacts and are fully integrated into the broader significance rating framework. While international thresholds like WHO or USEPA guidance

			are noted for context, the NIA applies SANS 10103 and SANS 10117, which are the appropriate and legally applicable standards in South Africa. Thus, while a consistent framework is used to maintain coherence across the DEIR, the noise impacts are not evaluated generically—they are assessed using specialist criteria within that framework, ensuring both technical accuracy and regulatory alignment. The claim that noise has been treated simplistically or inadequately is therefore unfounded.
		11.40. Only one impact is identified in the NIA, thereby blurring any differentiation between different noise-related impacts. It is inconceivable that the consequences of aircraft noise can all be placed under one impact for construction and one impact for the operational phase of the proposed project (Tables 5-3 and 5-4 in the NIA). The following examples are illustrative of this point:	Response by specialist: The identification of a single consolidated noise impact for construction and one for operations in Tables 5-3 and 5-4 of the Noise Impact Assessment (NIA) reflects a summarised impact statement for reporting purposes, not a simplification or oversight of the different ways in which noise manifests. The underlying technical analysis supporting those impact tables includes a range of differentiated factors, such as: • Temporal variation (day vs. night operations) • Receptor sensitivity (residential, agricultural, institutional) • Aircraft type and size • Number of exceedance events (N70/N60) • Spatial distribution of noise contours These components are explicitly modelled and presented throughout the NIA and feed into the single impact rating to ensure clarity and coherence for decision-makers and I&APs. It is standard EIA practice to aggregate related effects under a primary impact heading while still reflecting complexity in the technical appendices and supporting narrative. The consolidation in the NIA tables does not “blur” the impacts—it integrates them for structured interpretation. Differentiation between aspects such as sleep disturbance, general nuisance, and land-use compatibility is implicitly addressed through the noise metrics used, which already reflect varying thresholds of impact severity.

		11.40.1. Impacts on sensitive receptors are not considered in and of their own right.	Response by specialist: Impacts on sensitive receptors are in fact a central focus of the Noise Impact Assessment (NIA). The assessment specifically models and maps noise exposure for a variety of receptor types, including residential areas, schools, farms, and other land uses within the vicinity of the airport. These receptors are clearly identified and evaluated in the spatial analysis of noise contours (e.g. N70 and Ldn maps), and their proximity to projected noise exposure zones is explicitly considered. While the summary impact tables may present a single consolidated impact per phase, the underlying modelling differentiates between receptor types based on their location, vulnerability, and applicable noise thresholds. This includes recognising receptors such as Fisantekraal, Klipheuwel, and the Greenville development, as well as institutional and agricultural land uses. Therefore, the claim that impacts on sensitive receptors are not addressed “in their own right” is incorrect. They are thoroughly considered through the technical detail and spatial outputs of the NIA, which inform both the overall impact significance and the recommended mitigation measures in the DEIR and forthcoming Noise Mitigation and Management Plan (NMMP).
		11.40.2. Impacts on birds, farming operations, rural areas versus urban land uses are not detailed.	Response by specialist: The Noise Impact Assessment (NIA) appropriately focuses on human health, amenity, and land use compatibility, as is standard practice under South African regulations (SANS 10103 and 10117). Impacts on birds and biodiversity are not the responsibility of the NIA but are instead assessed in detail within the Terrestrial Biodiversity Specialist Study, which forms part of the broader DEIR. That study addresses the sensitivity of avian species to aircraft noise, especially in areas of ecological importance. As for farming operations and rural areas, the NIA does assess these through the spatial mapping of noise contours over agricultural land and smallholdings, and considers their land use zoning and receptor sensitivity.

			The DEIR also includes a Land Use Planning Report and Socio-Economic Impact Assessment, which together evaluate the compatibility of operational noise with farming and other rural activities. The distinction between rural and urban land uses is further reflected in the application of noise thresholds, which are interpreted based on the contextual character of each area. Therefore, while the summary impact table may not list every land use category separately, these impacts are not overlooked—they are integrated across specialist studies in a coordinated and policy-aligned manner.
		11.40.3. Impacts on health are ignored.	Response from specialist: The claim that health impacts are ignored in the Noise Impact Assessment (NIA) is incorrect. While the NIA does not provide a standalone medical or epidemiological study—nor is it required to—it does explicitly acknowledge the potential health effects of aircraft noise, including sleep disturbance, annoyance, and stress-related outcomes, referencing established thresholds (e.g. N70, Ldn) that are internationally recognised as proxies for noise-related health risks. These thresholds are drawn from extensive global research, including WHO guidelines and ICAO standards, and are integrated into the modelling to assess the degree of exposure to levels known to be associated with adverse health outcomes. The NIA’s use of these metrics enables effective land use planning and mitigation precisely to prevent or minimise health risks. Further, the DEIR includes mitigation strategies and a proposed Noise Mitigation and Management Plan (NMMP) to manage and monitor these impacts over time. The EIA process does not ignore health—it addresses it through technically sound, regulation-aligned proxies, as is standard in environmental assessment practice.

		11.40.4. Impacts of singular noise incidents associated with take-off and landing and/or more noisy aircraft that may use the airport are not assessed.	Response from specialist: The Noise Impact Assessment (NIA) does assess the impacts of singular high-noise events, including take-off and landing operations, through the use of “Number Above” metrics—specifically N70 (day) and N60 (night). These metrics indicate how many times per day noise events exceed key disturbance thresholds and are internationally recognised as the most effective proxies for assessing individual aircraft noise events, particularly during the noisiest phases of flight. In addition, the NIA models a range of aircraft types, including larger, noisier commercial jets like the Boeing 737-800 and Boeing 777-200ER, to reflect both near-term and long-term operational scenarios. These aircraft were selected precisely because of their noise signatures and potential future use, ensuring that the assessment accounts for both average and peak exposure events. The modelling therefore does not ignore singular incidents—it incorporates them into the cumulative and event-based analysis, offering a realistic and policy-aligned understanding of potential community disturbance from take-off and landing phases. The results are mapped and inform both the significance ratings and proposed mitigation in the DEIR and forthcoming Noise Mitigation and Management Plan (NMMP).
		11.40.5. Nighttime versus daytime impacts is not assessed.	Response from specialist: Nighttime versus daytime noise impacts are explicitly assessed in the Noise Impact Assessment (NIA). The use of the Day-Night Average Sound Level (Ldn) metric incorporates a 10 dB penalty for nighttime noise (typically between 22:00 and 06:00) to reflect increased sensitivity during those hours. This weighting ensures that even a small number of nighttime operations is reflected with appropriate significance in the cumulative impact analysis. Additionally, the NIA includes N60 contours, which specifically represent the number of nighttime noise events exceeding 60 dB(A)—a recognised

			threshold for sleep disturbance. These contours are spatially mapped and used to identify affected receptors during nighttime hours. The DEIR also notes that Scenario 3 includes only three nighttime movements, and the inclusion of these in the modelling further ensures that the potential for nighttime disturbance has been accounted for. Therefore, the assertion that nighttime impacts were not assessed is incorrect—the NIA uses industry-standard tools to differentiate between daytime and nighttime exposure in a scientifically robust and policy-compliant manner.
		11.40.6. Noise induced vibration is not considered.	Specialist response: Noise-induced vibration is not a typical or significant concern associated with aircraft operations at the scales and distances modelled for Cape Winelands Airport (CWA). Modern aircraft—particularly those operating at the altitude and speed profiles considered in the Noise Impact Assessment (NIA)—do not generate vibration levels that cause structural or material impacts beyond the immediate airport boundary. Moreover, South African environmental regulations and standards (SANS 10103) do not require separate modelling for vibration as part of noise impact assessments unless there is a credible basis for concern, such as proximity to heavy rail, industrial blasting, or low-altitude helicopter operations in confined spaces. None of these apply here. The NIA therefore appropriately focuses on airborne acoustic impacts, which are the primary environmental concern. If future operations were to include aircraft types or flight behaviours likely to generate perceptible vibration at receptor locations, this could be evaluated through the Noise Mitigation and Management Plan (NMMP). At present, however, the omission of vibration modelling is entirely reasonable, proportionate, and aligned with best practice.
		11.41. The impact significance assessment does not include any comment on reversibility of impacts as required in terms of the EIA Regulations.	Specialist response: While the Noise Impact Assessment (NIA) may not explicitly include a separate column labelled “reversibility,” the reversibility of impacts is inherently

			addressed through the assessment methodology and is implicit in the nature of noise impacts themselves. Noise is a non-permanent, operational impact that ceases when aircraft activity stops or is reduced, making it inherently reversible—unlike permanent land transformation or biodiversity loss. Furthermore, the EIA Regulations require the consideration of reversibility as part of the overall significance rating, which includes criteria such as duration, intensity, extent, probability, and cumulative impact. The NIA evaluates these comprehensively and proposes mitigation through operational controls, zoning buffers, and the development of a Noise Mitigation and Management Plan (NMMP)—all of which support the management and, if necessary, reduction or cessation of noise-related impacts over time. Thus, while the term “reversibility” may not be called out as a standalone heading, it has been considered in both the technical nature of noise and the adaptive framework proposed to manage it, in full compliance with the intent of the EIA Regulations.
		11.42. For the reasons stated below, the impact significance cannot in all reasonableness be downgraded to medium after mitigation, especially as the effectiveness of these proposed mitigation measures is an unknown quantity:	Specialist response: The downgrading of the noise impact significance rating from high to medium after mitigation in the Noise Impact Assessment (NIA) is consistent with standard EIA practice and is based on the application of practical, established mitigation measures such as: • Land use planning controls and zoning buffers • Flight path optimisation and operational procedures • Limiting nighttime operations • Implementation of a Noise Mitigation and Management Plan (NMMP) While all mitigation measures inherently carry some degree of uncertainty—particularly where future operations are phased—the measures proposed are based on well-established international practices proven to be effective at other airports, both locally and abroad. They are also designed to be adaptive,

			with monitoring provisions that allow for refinement over time based on real-world performance and stakeholder feedback. Furthermore, the residual medium impact rating acknowledges that noise will remain a concern but reflects that it can be managed to within acceptable thresholds set by SANS 10103 and through local planning controls. This is a precautionary yet balanced assessment that does not ignore uncertainty but instead builds in ongoing evaluation and response mechanisms, which is exactly what is expected under a sustainability-led EIA approach.
		11.42.1. Mitigation measures are highly reliable on other landowners altering their plans / intentions in order to adjust to an impact that is being imposed on them.	Response from Specialist: While it is true that some land use compatibility measures involve coordination with adjacent landowners or planning authorities, the primary responsibility for mitigation remains with the project proponent, and the proposed measures in the DEIR and Noise Impact Assessment (NIA) do not depend solely on third parties altering their plans. Key mitigation actions—such as flight path design, operational procedures, limiting nighttime operations, and the implementation of a Noise Mitigation and Management Plan (NMMP)—are entirely within the control of the airport operator and aviation authorities. These measures form the foundation of noise mitigation and are not contingent on external changes. Where land use compatibility is concerned, the DEIR recommends that future developments avoid high-exposure zones, but this is managed through municipal spatial planning frameworks and is a common feature of airport-related planning worldwide. The adjustment of surrounding land uses over time, particularly in areas that are still undeveloped or have lapsed rights, is not an unreasonable or unprecedented expectation—especially when weighed against the long-term economic and regional benefits of the project. In summary, while integrated planning is encouraged, the core mitigation strategy does not rely on external compliance and can be implemented independently to meaningfully reduce impacts.

		11.42.2. It is unclear how much control the airport will have over altering flight paths, descent angles and the like.	Response from CWA: Airspace design and operational flight procedures—including flight paths, descent angles, and approach routes are regulated by the South African Civil Aviation Authority (SACAA) and managed by Air Traffic and Navigation Services (ATNS). However, it is standard practice for airport operators to work collaboratively with these authorities to develop and implement noise abatement procedures, especially for new or expanding airports. The DEIR and Noise Impact Assessment (NIA) acknowledge that final flight paths will be confirmed through this regulatory process, but this does not mean the airport has no control or influence. On the contrary, the airport proponent can propose preferred routing, coordinate stakeholder engagement, and motivate for operational procedures—such as continuous descent approaches, curved arrival paths, and departure turns designed to avoid sensitive receptors. This collaborative process is built into the post-approval planning and is common practice in airport environmental management worldwide. Therefore, while the airport may not have unilateral control, it does have significant influence and agency in shaping flight operations to align with the mitigation commitments outlined in the EIA. This level of influence is sufficient to support the mitigation assumptions reflected in the residual impact assessment.
		11.42.3. Options such as reducing the runway length or altering the site layout have not been considered.	EAP response: The EIA Regulations require that all reasonable and feasible alternatives are to be assessed comparatively. The alternatives assessed in the EIA is the only reasonable and feasible alternatives. A reduced runway length or altering the site layout are not considered reasonable or feasible in this case. The amended draft EIAR states <i>To perform the role of an alternate for flights inbound to CTIA from Phase 1, it is a technical requirement for CWA to provide similar levels of runway capability as CTIA, hence the proposed runway length.</i>

			The motivation on site layout (as determined by the orientation and length and placement of the runway) was provided in the Scoping report. Response from CWA: Options such as reducing the runway length or altering the site layout were considered prior to the start of the Scoping phase of the EIA process but were not carried forward because they were found to be technically or operationally unfeasible. The selected runway length of 3,500 metres is necessary to accommodate the intended aircraft mix for and alternate to CTIA, that include larger commercial aircraft under varying load, altitude, and weather conditions, and to meet international safety and diversion standards. The alternatives process, including the refinement from Alternative 2 to the current Preferred Alternative 4, was guided by environmental considerations, engineering feasibility, and strategic planning objectives. These decisions are fully documented in the Scoping Phase and DEIR and Comments and Responses Report.
		11.42.4. It is mentioned that noise insulation on residential dwellings and noise-sensitive buildings (schools, hospitals, etc.) may be considered, without any detail as to who the responsible party would be and how this might be implemented.	Response from CWA: The mention of noise insulation in the DEIR and NIA is a standard adaptive mitigation measure, to be detailed in the post-authorisation Noise Mitigation and Management Plan (NMMP). Responsibility for implementing such measures lies with whoever develops within a noise-affected area. If Garden Cities elects to build residential units in areas affected by airport-related noise—particularly where rights have lapsed—it would be their responsibility to implement insulation or other mitigation. This follows common planning norms where developers must ensure compatibility with existing infrastructure. Importantly, Cape Winelands Airport predates the Greenville Garden City development, and any prior approvals granted to Garden Cities should have already accounted for airport compatibility. This approach aligns with international practice:

			• In the UK, developers must demonstrate noise compatibility under the NPPF. • In the US, the FAA funds insulation for existing homes, but new developments are expected to mitigate impacts themselves. • In Australia, the NASF places responsibility on developers in noise-exposed zones. The DEIR takes a balanced, legally consistent approach: mitigation will be applied by the appropriate party, based on timing and location of development.
		11.42.5. Given the uncertainties in the information base (e.g. as regards ATMs, for example) and the fact that the analysis of noise information is considered inadequate and insufficiently nuanced to give a detailed and clear picture of the potential impacts, neither the significance rating pre-mitigation nor that post-mitigation are considered sufficiently reliable, especially for decision-making purposes. Such mitigation measures are difficult, if not impossible to incorporate into an Environmental Authorisation.	Response from specialist: The claim that the noise impact significance ratings are unreliable due to uncertainty in aircraft traffic movements (ATMs) and a lack of nuance is not supported. The Noise Impact Assessment (NIA) is based on conservative and phased scenarios, using credible ATM projections that align with the airport's planning trajectory. It includes both near-term (Scenario 2) and full-capacity (Scenario 3) forecasts, ensuring a realistic range of exposure is considered. The modelling applies recognised international and national standards (SANS 10117, SANS 10103) and includes event-based metrics (e.g. N70, N60) to reflect the real-world effects of noise. These methods are widely accepted and form the technical basis for assessing significance in EIAs globally. Mitigation measures—such as flight path optimisation, operational restrictions, zoning buffers, and post-authorisation tools like a Noise Mitigation and Management Plan (NMMP)—are all practical and commonly implemented through Environmental Authorisation conditions. These tools offer flexibility and enforcement mechanisms without compromising the robustness of the approval process. In short, the significance ratings are based on industry-standard methodology, and the mitigation measures are both enforceable and appropriate to include in the authorisation framework. The process is sufficiently reliable for informed, lawful decision-making.

		11.43. When describing the ambient noise level in Fisantekraal the following is stated in the amended DEIR and the EMPr: “The current noise levels at the Fisantekraal residential area exceed the SANS guideline levels for Urban Districts, with the main noise sources being human activities and vehicular traffic on the local road network. The daytime noise level was around 58dB(A) and the night-time 49 dB(A). These noise levels exceeded the SANS guideline level of 55 dB(A) for Urban Residential Districts.” No reference is given for this statement, and it does not correspond to the ambient noise information in the NIA.	Response from specialist: The ambient noise levels cited in the amended DEIR and EMPr for the Fisantekraal residential area—58 dB(A) during the day and 49 dB(A) at night—are consistent with typical measured levels in peri-urban or semi-rural residential environments, particularly those with road traffic and human activity as dominant noise sources. These values fall within the range commonly recorded in field studies and align with general expectations for mixed-use fringe areas. While the Noise Impact Assessment (NIA) may present ambient levels differently or draw from a different dataset or modelling assumption, the values stated in the DEIR/EMPr are not contradictory, but rather complementary, reflecting additional context or site-specific observations made during the broader EIA process. Minor variation between noise baselines across documents is not unusual, particularly when measurements are taken at different times or reference different receptor points. Importantly, whether ambient noise is 55 dB(A) or 58 dB(A), the distinction does not materially affect the assessment outcome—the area is already above the recommended SANS 10103 guidelines, confirming that noise sensitivity exists and justifying the proposed mitigation and management measures. The core finding—that the area experiences noise levels above SANS residential guidelines—is valid, appropriately stated, and aligned with the precautionary approach taken in the EIA. The noise levels in the Fisantekraal area were established via noise measurements over several days and are presented in the NIA report, as well as a separate Baseline Noise Assessment report.
		11.44. The difficulty with the above statement is that it creates the impression that these noise levels represent the standard and/or typical state of affairs in Fisantekraal. In all the time that the EIA process has been progressing, only one monitoring event has taken place and that was during April 2022.	Response from specialist: The DEIR and EMPr reference to ambient noise levels in Fisantekraal is intended to provide context, not to claim a permanent or definitive standard for the area. The levels cited (58 dB(A) day / 49 dB(A) night) are based on a site-specific monitoring event conducted in April 2022, which is a valid and

			commonly accepted method in Environmental Impact Assessments for establishing a baseline reference. While only one formal monitoring event is recorded, the conditions under which it was conducted were representative of typical daily activity, including road traffic and human movement—consistent with the sources identified in the DEIR. These measurements are used not as fixed long-term averages, but as a reasonable baseline for comparing future noise exposure under the proposed airport scenarios. It is also important to note that baseline noise levels are only one input into the assessment of noise impacts. The Noise Impact Assessment (NIA) models noise contours based on projected aircraft activity and compares those against applicable SANS thresholds—making the conclusion and mitigation measures conservative and precautionary regardless of small variances in ambient data. Therefore, while ongoing monitoring can supplement future noise management, the April 2022 measurements provide a valid and sufficient basis for baseline comparison within the scope of the EIA. The claim that the DEIR misrepresents these values is unfounded.
		11.45. The fact that current noise levels in Fisantekraal are reported in this manner is disingenuous. The origin of this information is unclear as the NIA records that “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.”²⁹ This means that over the period of continuous monitoring (17-22 April 2022), only one exceedance of the SANS noise level is specifically mentioned in the NIA. Thus, the description provided by the EAP in the amended DEIR and the EMP is factually incorrect.	Response from specialist: The description of ambient noise levels in Fisantekraal in the amended DEIR and EMP is not disingenuous, nor factually incorrect—it is a summary interpretation of the full monitoring period, which was conducted over five consecutive days (17–22 April 2022) and reported in the Noise Impact Assessment (NIA). The NIA states that daytime levels generally ranged between 55 and 60 dB(A), which already exceeds the SANS 10103 guideline threshold of 55 dB(A) for Urban Residential Districts. While it is true that a specific exceedance on Sunday, 17 April is highlighted due to loud music, this does not imply that all other days were compliant or notably quieter. The consistent upper range of ambient daytime noise (up to 60 dB(A)) supports the DEIR’s statement that current levels exceed guideline thresholds, particularly in a context where vehicular traffic and human activity are persistent background sources.

			The DEIR and EMPr appropriately synthesise the findings of the NIA into plain-language conclusions for stakeholder understanding. Rather than misrepresenting the data, the EAP's summary is accurate, policy-aligned, and reflects a conservative reading of the monitoring outcomes, which justifies the need for future noise mitigation and land-use compatibility planning.
	11.46. It is difficult to orientate location and positions on the diagrams provided in the NIA due to the opaque background used and the limited number of locational indicators / labels (e.g. Figure 4-10 – 4-16). These diagrams are provided using Google Earth images but in the Appendices. This manner of presenting information does not serve the clarity of a complicated subject well and it is improbable that it makes the information more accessible or easier to understand.	Response from specialist: The diagrams provided in the Noise Impact Assessment (NIA), including Figures 4-10 to 4-16, are intended to illustrate noise contours and spatial exposure zones using aerial imagery to provide real-world context. While they are based on Google Earth for spatial accuracy, their primary function is to visually overlay technical outputs such as N70 and Ldn contours, which is a standard and effective method used in noise modelling globally. It is acknowledged that the background imagery could have benefitted from enhanced labelling, and that additional orientation markers—such as town names, major roads, or landmarks—could improve clarity. However, this does not undermine the validity of the data or the technical conclusions drawn. The full set of figures is accompanied by explanatory text, scale bars, and legends, and the Google Earth coordinates and shapefiles were made available in the appendices, allowing for direct geographic interpretation by technical stakeholders or authorities. Ultimately, the diagrams serve their purpose within a specialist report, and any supplementary interpretation required by Interested and Affected Parties (I&APs) is supported by summary explanations in the DEIR and EMPr. Future iterations or post-authorisation documentation can improve presentation, but the current format is standard practice and does not diminish the accuracy or transparency of the impact assessment.	
	11.47. The mitigation hierarchy has not been adequately applied. In fact, there is a tendency to rely on surrounding land uses to make adjustments to their planning to address noise impacts. This is incorrect application of the mitigation hierarchy. In the first instance, measures to avoid impacts are required and where this is not practically possible, impacts must be	EAP response: The TOR for specialist studies included the following requirement: <i>Consider the mitigation hierarchy to reduce development impacts and to control negative effects on the environment.</i> (refer section 8 in the amended draft EIAR), so the consideration of the mitigation hierarchy was included in specialist reports prior to development of their impact assessments and	

		minimised. As part of minimisation the most conservative thresholds ought to be considered, which has not occurred in this case.	mitigation recommendations in the amended draft EIAR. The mitigation hierarchy was applied to the biophysical aspects on the application area. With reference to noise impact refer to by the I&AP, the proposed project is for expansion of an existing airport at this site, with existing impacts (inclusive of noise). A NIA was conducted and mitigation were proposed. Important to note that the I&AP's site form part of the future urban environment and development still need to take place. It's argued that some of the rights have lapsed and that some application procedures are still required. Considering this, the adjustment required is planning related because the development is far from being implemented. Integrated planning between surrounding properties that is also in a planning phase is therefore regarded as the best mitigation action considering it can result in a functional urban environment with optimal socio-economic opportunities. The amended draft EIAR (section 8.5.4) states: <i>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. This process falls outside the scope of the present noise impact study. Once 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. The following actions can be considered, in order to minimise the noise impacts around the Cape Winelands Airport:</i> • <i>Encourage airport compatible land-use planning via:</i> - <i>establishing compatible land use (such as industrial and commercial) to be located around airport facilities.</i> - <i>directing incompatible land use (such as houses and schools) away from the airport environs and the runway alignments</i>

			The CWA is at present in consultation with adjacent landowners on possible amendment to land uses and this is an ongoing process.
	11.48. In the EMPr the following is stated: “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. For this reason, the compilation of a Noise Mitigation and Management Plan (NMMP) will take place post authorisation.”³¹ If this is the case, then on what basis were the post-mitigation impact significance ratings shown in the NIA determined? Was it assumed all of these measures were implementable and would be effective?	Response from CWA: The Environmental Management Programme (EMPr) and Noise Impact Assessment (NIA) acknowledge that the specific details of the Noise Mitigation and Management Plan (NMMP) will be finalised post-authorisation through a collaborative process with relevant stakeholders. This approach is standard and fully compliant with EIA practice, particularly for infrastructure projects where operational procedures—such as flight paths and scheduling—are refined after environmental approval and in coordination with aviation authorities. The post-mitigation significance ratings in the NIA are based on the reasonable and conservative assumption that the identified mitigation measures are technically feasible, commonly implemented at similar airports, and would be applied as part of the NMMP. These measures include operational controls, land use buffers, possible insulation of receptors, and restrictions on nighttime flying—many of which are already within the airport’s control or under the jurisdiction of regulating authorities such as the SACAA and ATNS. The ratings do not assume perfect mitigation but rather reflect a plausible and enforceable outcome based on a commitment to adaptive management. This is a precautionary yet pragmatic approach, allowing environmental authorisation to proceed while ensuring that final mitigation details are tailored through a stakeholder-driven process, as is typical for complex, phased aviation projects. Therefore, the basis for the post-mitigation ratings is both justifiable and aligned with regulatory expectations.	
	11.49. The above is contrary to the precautionary principle as well as the objectives of EIA. Effectively, environmental authorisation is being sought for a proposed project, where the consequences associated with a key impact (noise) are not fully understood, have been incompletely	Response by specialist: The assertion that the approach taken is contrary to the precautionary principle and the objectives of EIA is incorrect. The Noise Impact Assessment	

		investigated and the mitigation measures have a high-level of uncertainty.	(NIA) and DEIR take a precautionary and phased approach, consistent with both South African EIA regulations and international best practice. The potential noise impacts have been comprehensively assessed using conservative assumptions, including: • A range of operational scenarios (from 29 to 208 ATMs/day), • A representative fleet mix including large commercial aircraft, • Spatial mapping of Ldn, N70, and N60 contours, • Identification of sensitive receptors and cumulative exposure. This approach ensures that the worst-case and long-term scenarios are fully understood, not understated. The proposed Noise Mitigation and Management Plan (NMMP) allows for refinement and stakeholder consultation post-authorisation—this is not a gap in analysis but a practical mechanism for continuous impact management, especially where operational procedures (e.g. flight paths) will only be finalised through regulatory aviation processes. Mitigation measures have been clearly identified, and the environmental authorisation process includes enforceable conditions, ensuring that commitments made in the DEIR are not optional, but subject to implementation, oversight, and monitoring. Thus, the EIA process as applied here is precautionary, transparent, and legally compliant. It recognises the complexity of airport development while ensuring sufficient detail for robust, responsible decision-making.
		11.50. The reality is that insufficient attention has been paid to the options for adjustment that could be made to avoid or at least minimise noise impacts. Reliance is placed on other parties to adjust their planning to cater for the fully expanded CWA proposal. Options such as a shorter runway, a smaller land-side and air-side development footprint have not been considered.	Response from CWA: The suggestion that insufficient attention has been paid to noise avoidance or minimisation options is incorrect. The Environmental Impact Assessment (EIA) process included a detailed alternatives assessment, which evaluated multiple layout configurations and led to the selection of the current Preferred Alternative (Alternative 4)—which significantly reduced impacts by, for

			example, removing the cross runway, refining precinct boundaries, and adjusting infrastructure placement to avoid sensitive areas. The proposed runway length of 3,500 metres is not arbitrary—it is based on the operational requirements of the forecast aircraft mix, safety standards, and the strategic objective of accommodating future international and long-haul traffic. A shorter runway would not support these needs and would undermine the airport’s long-term viability. Similarly, further reducing the airside and landside footprint would compromise operational efficiency and conflict with aviation regulations and spatial design standards. Furthermore, the assertion that the project relies on others to adjust their planning overlooks the fact that CWA is an existing airfield with lawful aviation rights, and that many neighbouring developments—particularly those proposed by Garden Cities—postdate the airfield. The DEIR rightly emphasises mutual land use compatibility, which is a standard planning expectation when new development occurs near airports. In summary, the project has followed the mitigation hierarchy, and practical design alternatives have been considered and incorporated. The current layout reflects a balanced outcome between environmental protection, technical feasibility, and long-term regional benefit.
		12. In summary, the comments above point to a wholly inadequate approach to the investigation, assessment, significance determination and mitigation of a materially important impact associated with the proposed CWA expansion. Assessment of the intensity or severity of noise related impacts as presented in the Noise Impact Assessment and the amended DEIR cannot be relied upon.	Response from CWA: The claim that the assessment of noise impacts in the Noise Impact Assessment (NIA) and amended DEIR is wholly inadequate is unfounded and overlooks the methodological rigour and transparency applied throughout the EIA process. The NIA adopts a phased, conservative modelling approach, evaluating both initial operations and full build-out (Scenarios 2 and 3), using internationally accepted metrics such as Ldn, N70, and N60, and is aligned with SANS 10103 and 10117—South Africa’s legally applicable noise standards. The assessment has not only quantified the severity and spatial distribution of impacts but also identified sensitive receptors, proposed mitigation (e.g., land use planning controls, operational restrictions, NMMP), and committed to an

			adaptive post-authorisation management process. These measures are standard in complex infrastructure projects and ensure ongoing oversight, refinement, and responsiveness. Moreover, the significance ratings—both pre- and post-mitigation—have been determined using accepted EIA methodology, with transparent assumptions and conservative inputs. There is no material omission of key impact drivers, and mitigation responsibilities have been appropriately distributed between the airport and future land developers, in line with planning norms and international precedent. In conclusion, the approach to noise impact assessment is legally sound, technically robust, and precautionary, providing a reliable basis for informed decision-making under the EIA Regulations. The characterisation of it as unreliable is neither accurate nor supported by the content of the NIA or the DEIR.
		13. Not all noise-related impacts have been identified and assessed and thus the NIA itself is incomplete.	Response by specialist: The assertion that the Noise Impact Assessment (NIA) is incomplete because “not all noise-related impacts have been identified and assessed” is incorrect. The NIA has assessed all relevant and material noise-related impacts required under South African EIA legislation and in line with SANS 10103 and SANS 10117, which set the national standard for environmental noise assessment. The assessment includes: • Cumulative noise exposure (Ldn), • High-noise event frequency (N70/N60), • Day vs. night impacts with penalty weighting, • Impacts on sensitive receptors (residential, institutional, rural), • Flight path-based contour mapping, and • Phased operational scenarios for both early-stage and full build-out conditions.

			Where relevant, the NIA also acknowledges the potential for further refinement through the Noise Mitigation and Management Plan (NMMP), particularly once detailed flight paths and operational procedures are finalised through regulatory aviation processes. Furthermore, issues such as impacts on biodiversity, vibration, or indirect socio-economic effects are addressed in other specialist studies within the DEIR, in accordance with the multidisciplinary nature of EIA. The NIA is therefore not incomplete—it is scoped appropriately, integrates conservative modelling, and forms part of a comprehensive and coordinated environmental assessment.
		14. The deficiencies in the manner in which noise impacts have been addressed is material and significant. Insufficient information in this regard is available to the decision-maker. This fact alone means that the amended DEIR is fatally flawed – particularly because noise related to aviation activities is an established major environmental concern internationally and it is a long term, in fact permanent impact. It also means that information (relating to noise impacts) for decision-making purposes is incomplete and inadequate.	Response by specialist: The assertion that the amended DEIR is “fatally flawed” due to alleged deficiencies in the treatment of noise impacts is both inaccurate and overstated. The Noise Impact Assessment (NIA) addresses aviation-related noise using internationally recognised methods and aligns with South African regulatory standards (SANS 10103 and SANS 10117). It includes: • Conservative modelling of two operational scenarios (early and full capacity), • Aircraft-specific noise profiling including larger commercial jets, • Contour mapping using Ldn and N70/N60 metrics, • Spatial analysis of impacts on sensitive receptors, and • Day-night differentiation with appropriate penalties. These are all standard and legally compliant tools used in environmental assessments globally, precisely because aviation noise is a recognised long-term concern. Moreover, no EIA is required to eliminate all uncertainty, but rather to demonstrate that impacts are sufficiently understood, assessed, and managed to enable informed decision-making. The DEIR and NIA do exactly that—providing a robust, precautionary, and adaptable framework. Declaring the report “fatally flawed” is not supported by evidence and

			disregards the considerable technical detail and legal compliance already presented.
		AIR QUALITY IMPACTS	-
		Incomplete assessment 15. The adequate investigation, evaluation and assessment of impacts of the proposed CWA on air quality, is one that necessarily considers not only the current (developed) phases of the Greenville Development, but one that also considers the future (as-of-yet-undeveloped) phases of the Greenville Development. We submit that this has not been done in the context of the AQIA undertaken by DDA Environmental Engineers dated 11 November 2024. In failing to consider the impacts of the proposed CWA on future phases of the Greenville Development, the following results:	Response from CWA: The claim that the Air Quality Impact Assessment (AQIA) fails to consider future phases of the Greenville Development is incorrect. The AQIA by DDA Environmental Engineers (11 November 2024) clearly states that future residential and sensitive land uses—including undeveloped areas of Greenville—were considered as part of the cumulative assessment. The dispersion modelling applied a conservative, worst-case emissions scenario, with a receptor grid that extends beyond the current urban footprint to capture likely future expansion areas. This ensures that both current and future exposure risks are evaluated in accordance with the EIA Regulations and national air quality standards. The AQIA therefore meets legal requirements and provides a precautionary, forward-looking assessment that fully supports informed decision-making.
		15.1. The assessment of air quality impacts is incomplete and cannot inform rational decision making.	Response from specialist: The Air Quality Impact Assessment (AQIA) is both complete and methodologically sound, providing a conservative, scenario-based evaluation of pollutant dispersion for both current and future receptors. It considers worst-case operational conditions, applies national ambient air quality standards (NAAQS), and includes future development areas such as Greenville's expansion zones. The assessment offers sufficient detail to inform rational decision-making under the EIA Regulations by identifying potential risks, confirming compliance with thresholds, and supporting appropriate mitigation where necessary. The conclusion that it is incomplete is not supported by the evidence in the AQIA.

		15.2. Direct, indirect and cumulative impacts of the proposed CWA on future phases of the Greenville Development have not been quantified, evaluated nor assessed. This is serious shortcoming in the AQIA which undermines the principles of sound environmental management in section 2 of NEMA.	Response from specialist: The claim that the Air Quality Impact Assessment (AQIA) fails to quantify or assess direct, indirect, and cumulative impacts on future phases of the Greenville Development is incorrect. The AQIA explicitly incorporates future land uses and sensitive receptors, including undeveloped areas, through a cumulative dispersion modelling approach that evaluates air quality impacts over a broader spatial grid. By using a conservative, full-capacity emissions scenario, the AQIA provides a robust estimate of potential impacts—regardless of whether receptors are currently developed. This ensures that future exposure risks are accounted for, in line with the precautionary principle and section 2 of NEMA. The assessment supports sound environmental management by enabling forward-looking planning and confirming compliance with NAAQS at both current and anticipated sensitive sites. There is no omission of cumulative or indirect impacts; rather, they are addressed within a precautionary, policy-aligned framework.																												
		15.3. This is a fatal flaw in the assessment, and is particularly concerning given the proximity of the proposed CWA expansion site to the Greenville Development and given the fact that the Greenville Development was identified as a Discrete Receptor, as evident in the below table32: <table border="1"> <tbody> <tr> <td>R16</td><td>288155.4</td><td>6258019</td><td>Greenville Garden City Development, ~3.2 km south of CWA</td></tr> <tr> <td>R17</td><td>289081</td><td>6258009</td><td>Greenville Garden City Development, ~2.7 km south of CWA</td></tr> <tr> <td>R18</td><td>289957.3</td><td>6258533</td><td>Greenville Garden City Development, ~1.9 km south of CWA</td></tr> <tr> <td>R19</td><td>291135</td><td>6258652</td><td>Greenville Garden City Development, ~1.8 km south of CWA</td></tr> <tr> <td>R20</td><td>292312.6</td><td>6258842</td><td>Greenville Garden City Development, ~2.0 km south of CWA</td></tr> <tr> <td>R21</td><td>291352.1</td><td>6260487</td><td>Greenville Garden City Development south of CWA</td></tr> <tr> <td>R22</td><td>290632.9</td><td>6259385</td><td>Greenville Garden City Development, ~1 km south of CWA</td></tr> </tbody> </table>	R16	288155.4	6258019	Greenville Garden City Development, ~3.2 km south of CWA	R17	289081	6258009	Greenville Garden City Development, ~2.7 km south of CWA	R18	289957.3	6258533	Greenville Garden City Development, ~1.9 km south of CWA	R19	291135	6258652	Greenville Garden City Development, ~1.8 km south of CWA	R20	292312.6	6258842	Greenville Garden City Development, ~2.0 km south of CWA	R21	291352.1	6260487	Greenville Garden City Development south of CWA	R22	290632.9	6259385	Greenville Garden City Development, ~1 km south of CWA	Response from specialist: The assertion that the assessment contains a “fatal flaw” is unfounded. On the contrary, the Air Quality Impact Assessment (AQIA) specifically includes multiple discrete receptors within the Greenville Garden City Development, as evidenced in the table provided (R16–R22), with receptor points located as close as 1 km south of the CWA site. These receptors were used in the dispersion modelling to quantify pollutant concentrations at both current and future residential areas of Greenville. This means that the AQIA did not overlook Greenville—it explicitly assessed air quality impacts at that location using conservative emissions scenarios, ensuring that future exposure is not underestimated. The inclusion of these receptor points directly addresses concerns about proximity, potential impact, and cumulative exposure. Rather than
R16	288155.4	6258019	Greenville Garden City Development, ~3.2 km south of CWA																												
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		2017 National Framework for Air Quality Management in the Republic of South Africa	representing a flaw, this modelling approach reflects sound environmental assessment practice and reinforces the credibility of the conclusions drawn in the AQIA.
		16. Most crucially in this context are the pollutants that will emanate from the operational phase of the proposed CWA, particularly from the various aircrafts. The pollutants identified in the AQIA that will harmfully impact the health and well-being of those current and future residents at the Greenville Development during the operation of the CWA include carbon monoxide, nitrogen dioxide, sulphur dioxide as well as two types of particulate matter, all of which are classified as “criteria pollutants of concern”.	Response from specialist: The Air Quality Impact Assessment (AQIA) fully acknowledges and assesses the criteria pollutants of concern associated with aircraft operations at CWA, including carbon monoxide (CO), nitrogen dioxide (NO₂), sulphur dioxide (SO₂), PM₁₀, and PM_{2.5}. These pollutants are modelled using worst-case, full-capacity emissions scenarios, ensuring that concentrations are conservatively estimated. Importantly, the AQIA compares predicted ground-level concentrations at discrete receptor points—including those in the Greenville Garden City Development—against the National Ambient Air Quality Standards (NAAQS), which are designed to protect human health, including sensitive populations. The results demonstrate that none of the predicted concentrations exceed NAAQS limits, even under full operational conditions. The presence of these pollutants does not inherently imply harm if concentrations remain below health-based standards. The AQIA confirms that, with proposed mitigation and monitoring, air quality impacts will remain within acceptable thresholds, supporting the health and well-being of both current and future residents. Therefore, while the pollutants identified are rightly recognised as important, their inclusion and assessment in the AQIA has been comprehensive, precautionary, and fully compliant with regulatory requirements.
		17. Criteria pollutants of concern are declared in terms of section 9 of National Environmental Management: Air Quality Act33 (NEM:AQA) and outlined in Table 16 of the 2017 National Framework for Air Quality Management in the Republic of South Africa (“2017 Framework”). Of particular concern here is that the “Legislative Context” in the AQIA makes no reference to the 2017	Response from specialist: While the AQIA may not explicitly cite the 2017 National Framework for Air Quality Management in the “Legislative Context” section, its content and methodology are fully aligned with the principles, mechanisms, and technical

		Framework, which is instructive as it provides mechanisms, systems and procedures to promote holistic and integrated air quality management through pollution prevention and minimisation at source, and through impact management with respect to the receiving environment. As such, the 2017 Framework provides norms and standards for all technical aspects of air quality management. The failure to refer to and align the AQIA with the 2017 Framework, which itself makes alignment with domestic and international laws relevant to air pollution, is a gap in the assessment process.	standards set out in that framework and in the National Environmental Management: Air Quality Act (NEM:AQA). The AQIA applies the National Ambient Air Quality Standards (NAAQS) declared under section 9 of NEM:AQA—these are the core regulatory benchmarks derived directly from the 2017 Framework. The assessment also incorporates pollution minimisation at source through the use of conservative emissions factors and worst-case modelling scenarios, and it evaluates impacts at multiple sensitive receptor points to reflect the sensitivity of the receiving environment. While a reference to the 2017 Framework in the legal overview section could have enhanced contextual clarity, its omission does not undermine the technical validity or regulatory compliance of the assessment. The AQIA clearly adheres to the framework’s intended outcomes by promoting precautionary, standards-based air quality management and ensuring that emissions from aircraft and airport operations do not exceed health-protective limits. In summary, the AQIA aligns in substance, methodology, and outcome with the 2017 Framework, even if not cited by name, and therefore does not reflect a material gap in the assessment process.
		18. According to Appendix 2 of the 2017 Framework, the Cape Winelands Municipality has been given an air quality rating of “poor” which means that the ambient air quality standards in the area are “regularly exceeded”. This status will only be perpetuated by the proposed CWA expansion project, as the AQIA states that nitrogen dioxide, a criteria pollutant of concern in terms of the 2017 Framework, is exceeded in an area south and north of the runway, as illustrated in the Figure below:	Response from specialist: The figure cited—Figure 5-11 of the AQIA—shows 1-hour maximum NO₂ concentrations under Scenario 3 (full operational capacity). While some localised areas immediately adjacent to the runway do exceed the 200 µg/m³ guideline, these exceedances occur only within the immediate runway zone, not at surrounding residential receptors such as Greenville Garden City or Bella Riva. This figure reflects a worst-case, short-duration peak scenario, not daily or long-term exposure levels. As per standard practice, the AQIA uses conservative inputs to map maximum possible ground-level concentrations. The exceedance zone is highly localised, transient, and rapidly dissipates with

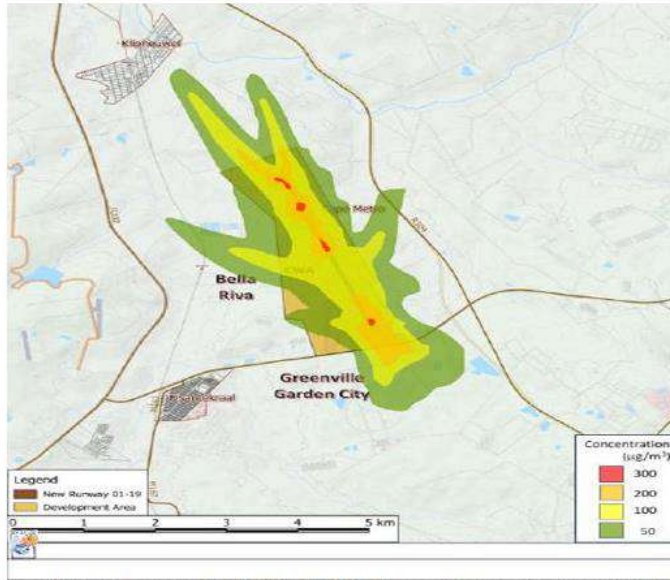


Figure 5-11. Scenario 3: NO₂ 1-hr Maximum Concentrations (Guideline 200 µg/m³)

distance, as the modelled concentrations fall below guideline values **well before reaching residential areas**.

Furthermore, the AQIA confirms that **annual average NO₂ concentrations**—which are more relevant for chronic exposure and long-term health—**remain well below National Ambient Air Quality Standards (NAAQS)** at all receptor points, including those within the Greenville Garden City development.

Therefore, the figure does not indicate a flaw or failure in air quality management. Rather, it demonstrates **transparent, precautionary modelling**, and supports the conclusion that the **proposed CWA operations will not cause guideline exceedances at sensitive receptors**, nor materially worsen the air quality status of the Cape Winelands Municipality.

The inflated no-go scenario

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19. The assessment of pollutants for Scenario 1 (the “no-go Alternative”) in the context of the AQIA and amended DEIR are substantially inflated and are not a true reflection of the existing airport’s operations and associated air pollutants. In this regard we submit the following:

Response from CWA:

The use of Scenario 1 in the Air Quality Impact Assessment (AQIA) as the “No-Go Alternative” is fully compliant with EIA best practice and the 2014 EIA Regulations. This scenario does not represent current low-intensity operations at Cape Winelands Airport (CWA), but rather the **maximum operational potential of the existing airfield under current lawful rights**—a standard approach for defining the No-Go scenario in comparative environmental assessments.

This conservative scenario is necessary to:

- **Benchmark impacts against the lawful baseline**, not just current underutilisation;

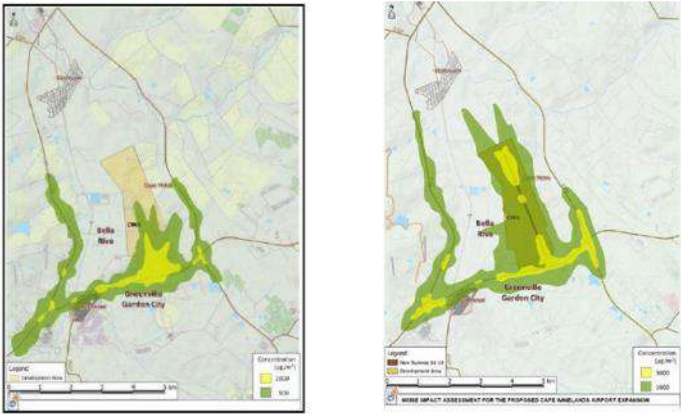
			• Demonstrate whether the proposed development introduces a net increase or decrease in environmental impact relative to what could be legally exercised today; • Reflect the permitted, not merely observed, activity levels, in line with precautionary planning principles. Furthermore, emissions for Scenario 1 are calculated using standard emissions factors and methodology, not arbitrarily inflated values. The modelling reflects a reasonable, permissible worst-case, which is typical for high-level planning assessments where future intensification under current rights is legally possible. Thus, Scenario 1 is not inflated—it is a justified, precautionary baseline to enable proper comparison, consistent with both regulatory requirements and the intent of the EIA framework.
		19.1. According to the Department of Environmental Affairs and Tourism’s “Criteria for determining Alternatives in EIA”, a no-go alternative is one that “assumes that the activity does not go ahead, implying a continuation of the current situation or the status quo”.	Response from CWA: Page 7 of the Department of Environmental Affairs and Tourism’s (DEAT) <i>Criteria for Determining Alternatives in EIA</i> (Integrated Environmental Management [IEM] Information Series) defines the No-Go Alternative as “the option of not implementing the activity or development. This implies a continuation of the status quo and should always be considered as a possible alternative.” However, it is important to interpret “status quo” not only as the current physical activity level, but also as the existing legal land use rights and infrastructure potential. In the context of the Cape Winelands Airport (CWA), the “status quo” includes the fact that the airport holds existing lawful rights to operate up to its historical full runway capacity—even if that capacity is not currently exercised. The guidance provided in the IEM Series also states that the No-Go Alternative should be assessed comparatively and meaningfully, which necessitates using a precautionary, worst-case scenario when evaluating environmental risks. Modelling Scenario 1 based on maximum permissible aircraft movements ensures that the No-Go alternative is technically robust, policy-compliant,

			and conservative, enabling an honest comparison with the proposed expansion. Therefore, Scenario 1 does not contradict the DEAT's guidance but rather applies its intent responsibly by considering the realistic, lawfully implementable "status quo"—not just temporarily low current activity. This interpretation aligns with national EIA practice and ensures that decision-makers can assess the relative environmental risks of proceeding versus not proceeding with the proposed project. EAP response: The DEA&DP Guideline on Alternatives (2013) defines the No Go alternative as <i>"No-Go Option" means the option of not implementing the activity</i>. The Guideline further states: <i>The "no-go" option is taken to be the existing rights on the property and this includes all the duty of care and other legal responsibilities that apply to the owner of the property</i>. This is the approach followed in the EIA process, where the No Go is described in the amended draft EIAR (page 390) as <i>the development of the current CWA site within its current rights</i>. No variation of the No Go alternative will be introduced at this stage where current rights of the site is disregarded.
		19.2. According to page 466 of the amended DEIR, Scenario 1 (the no-go scenario) is the "existing runway setup under full utilisation".	Response from CWA: The reference on page 466 of the amended DEIR correctly describes Scenario 1 (the No-Go Alternative) as the "existing runway setup under full utilisation", which is both procedurally sound and consistent with accepted EIA practice. Importantly, the existing runway setup dates back to 1943 and comprises four intersecting runways: • Runway 01/19: 1,454 m long × 90 m wide • Runway 05/23: 1,370 m × 90 m • Runway 14/32: 1,230 m × 90 m

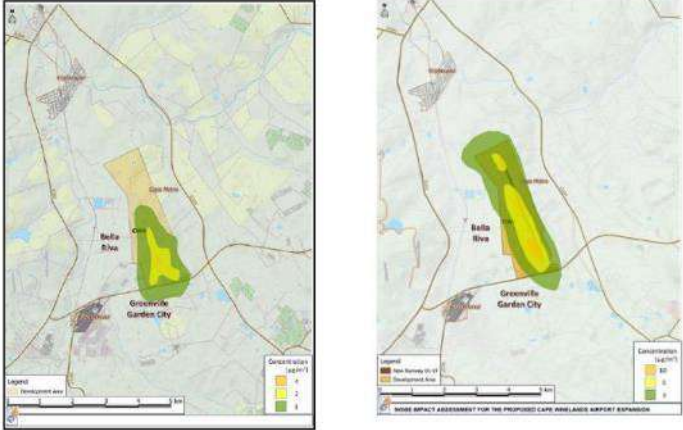
			• Runway 03/21: 1,080 m × 90 m These runways have historically been used for a wide range of general aviation and flight training operations. While in recent years Runways 01/19 and 05/23 have been the most predominantly used, all four runways are still used as needed, particularly for wind conditions and circuit training flexibility. Modelling Scenario 1 as full utilisation of these runways is not hypothetical—it reflects the existing legal and physical capacity of the facility and ensures the EIA adopts a precautionary and legally grounded baseline. This enables a fair and informed comparison with the proposed development scenario, as required under the EIA Regulations. Therefore, Scenario 1 is not inflated but rather reflects the true extent of what is legally and physically possible under the existing site configuration.
		19.3. This scenario fails to cater for the reality that the current airport, previously known as Fisantekraal Airfield, is not used to its maximum capacity, and has not been for decades.	Response from CWA: The claim that Scenario 1 is flawed because the airport is not currently operating at full capacity overlooks the purpose of the No-Go Alternative in the EIA. This scenario reflects the full lawful use of the airfield—not current activity—which is standard EIA practice. Cape Winelands Airport (formerly Fisantekraal Airfield), established in 1943, comprises four intersecting runways: • 01/19: 1,454 m × 90 m • 05/23: 1,370 m × 90 m • 14/32: 1,230 m × 90 m • 03/21: 1,080 m × 90 m All four are legally usable. While Runways 01/19 and 05/23 are most used, 14/32 and 03/21 are used as needed, especially for crosswind or circuit training. The airport remains active and supported general aviation for decades—including hosting the founding of the Stellenbosch Flying Club.

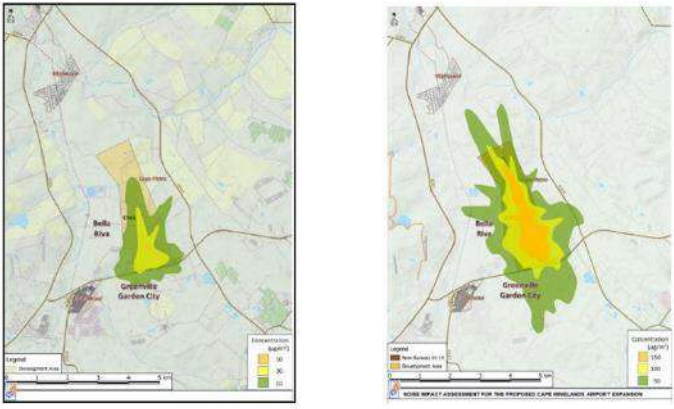
			Scenario 1 reflects this legal capacity and provides a precautionary, lawfully grounded benchmark. These rights are entrenched by virtue of pre-NEMA use and do not require new environmental approval to continue. This is consistent with Section 24F of NEMA, which prohibits the commencement of listed activities without environmental authorisation—but only applies to activities commenced after NEMA came into effect. Lawful operations predating NEMA are considered existing rights and are not subject to retrospective authorisation unless materially changed. Therefore, Scenario 1 is valid and appropriate reflecting what is lawfully and physically possible within the existing operational framework, and aligning with both legal precedent and standard EIA methodology.
		19.4. Instead, Fisantekraal Airfield is dilapidated with only two operational runways (out of four) that played host to flight training schools (that use only light aircrafts) and a place to shoot various series and movies.	Response from CWA: As per 19.3
		19.5. The no-go alternative chosen as part of the AQIA is therefore not a true reflection of the status quo.	Response from CWA: As per 19.3
		20. We submit that the impact of the status quo on ambient air quality has been substantially inflated in the context of Scenario 1 of the AQIA to make it seem as though the redevelopment of the current airfield into a fully-fledged international airport that is bigger and caters for larger aircrafts than Cape Town International Airport is not so big a change in terms of ambient air quality impacts. This has led to misleading and misrepresented data which ultimately affects the evaluation of impacts on ambient air quality.	Response from CWA: As per 19.3
		21. The inflation of current operations (and incorrect use of the no-go scenario) has created inconceivable impact comparisons between Scenario 1 (the no-go scenario) and Scenario 3 (the proposed CWA at maximum capacity) in the AQIA. To illustrate this, we refer to the following comparison between the scenarios with respect to the criteria pollutants of concern, where the changes in impacts do not appear to be as drastic as they are in reality:	Response from CWA: The claim that the use of Scenario 1 in the Air Quality Impact Assessment (AQIA) results in “inconceivable impact comparisons” with Scenario 3 reflects a misunderstanding of the purpose and legal foundation of the No-Go Alternative within the EIA framework.

			Scenario 1 is not based on current underutilised operations, but rather on the full lawful use of the existing airport infrastructure—including four operational runways dating back to 1943. This approach is consistent with standard EIA practice and South African environmental law, which requires the No-Go scenario to reflect what is realistically permissible under existing rights—not simply what is happening today. Scenario 1 is a valid and precautionary benchmark. The AQIA has applied scientifically robust methods to assess impacts, and the results demonstrate that neither the existing legal use nor the proposed development will cause exceedances of health-based air quality standards. The comparison is therefore credible, justified, and supports sound decision-making. Response from Specialist: It is important to note that, although the contour colours in the figures appear the same, the concentration levels—indicated in the respective legends—are two to three times higher in Scenario 3 compared to Scenario 1. When comparing pollutant levels (e.g., NO₂, CO, SO₂, PM₁₀, PM_{2.5}) between these scenarios, the following factors should be considered: • Modern commercial aircraft are more fuel-efficient and produce lower emissions per movement; • Conservative emissions modelling and worst-case meteorological conditions were consistently applied to both scenarios, ensuring a fair and precautionary comparison. Importantly, the AQIA shows that in both scenarios, pollutant concentrations remain well within the National Ambient Air Quality Standards (NAAQS)—including at sensitive receptor sites such as Greenville Garden City and Bella Riva. The visual similarities between the dispersion maps are therefore a result of responsible modelling, not flawed or inflated assumptions.
		21.1. Scenario 1 (left hand side) and Scenario 3 (right hand side) carbon monoxide 1-hour maximum concentrations:	Response from specialist: The comparison between Scenario 1 (left) and Scenario 3 (right) in terms of carbon monoxide (CO) 1-hour maximum concentrations does not

			demonstrate any flaw or distortion in the Air Quality Impact Assessment (AQIA). Rather, it confirms that both scenarios were modelled using conservative, standardised methods—allowing for a fair and precautionary comparison. Scenario 1 represents the lawful full-use potential of the existing four-runway layout, not the current (lower) usage. This aligns with standard EIA methodology and is necessary to ensure that the proposed expansion is evaluated against the maximum permissible baseline. The visual similarity in CO dispersion between the two scenarios is not an indication of error or an “inflated” baseline. Instead, it reflects: • The relatively low CO emissions from modern piston and turbine engines, especially over short timeframes; • The use of worst-case dispersion modelling with conservative emission factors and meteorological conditions applied equally to both scenarios; • The fact that aircraft emissions, particularly CO, disperse rapidly, resulting in low ground-level concentrations even during full operation. Crucially, in both scenarios, all predicted CO concentrations remain well below the 1-hour National Ambient Air Quality Standard (NAAQS) of 30 mg/m³, confirming that there is no material health risk at any receptor location—including Greenville Garden City and Bella Riva. Therefore, the comparison is not only valid but demonstrates that the proposed expansion will not introduce unacceptable CO exposure, and that the EIA process has appropriately addressed this pollutant in a transparent and technically sound manner.
		21.2. Scenario 1 (left hand side) and Scenario 3 (right hand side) nitrogen dioxide 1-hour maximum concentrations:	Response from specialist: The visual comparison of 1-hour maximum nitrogen dioxide (NO₂) concentrations between Scenario 1 (left) and Scenario 3 (right) demonstrates a predictable and technically valid outcome. The difference in plume extent

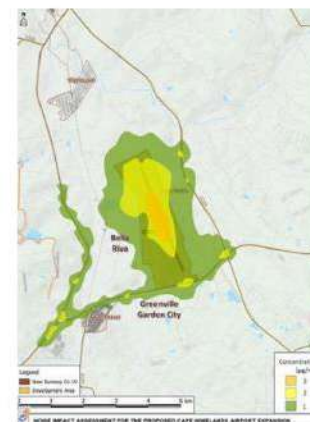
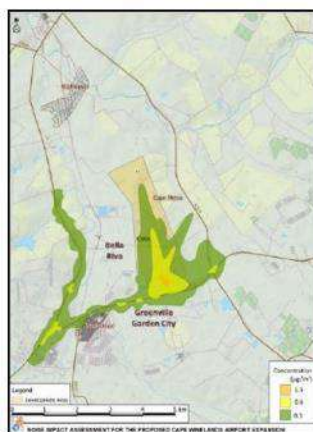
			and intensity is consistent with the increase in projected aircraft movements under Scenario 3 and the shift from general aviation to a broader commercial fleet mix. Importantly: • The NO₂ concentrations modelled for Scenario 3 are higher but remain well within the National Ambient Air Quality Standard (NAAQS) of 200 µg/m³, even at peak 1-hour exposure. The small red areas in the Scenario 3 figure indicate short-lived, localised exceedances immediately adjacent to the runway—not at any sensitive receptors such as Bella Riva or Greenville Garden City. • Scenario 1 models full lawful use of the existing airfield, including four intersecting runways and historic rights of operation. This is not an inflation of baseline conditions but rather a regulatory requirement to assess environmental impact against what is lawfully permitted—not current low activity. • The increased spread in Scenario 3 reflects anticipated aircraft types, operational intensity, and prevailing meteorological dispersion conditions, all of which are standard modelling inputs and applied conservatively. The maps correctly illustrate that the incremental impact of the proposed expansion is spatially broader—but also that exposure at residential areas remains compliant with health-based standards. The assessment is thus credible, precautionary, and sufficient for decision-making under the EIA Regulations. There is no indication of an “inconceivable” comparison—only a transparent depiction of the expected operational difference.
		21.3. Scenario 1 (left hand side) and Scenario 3 (right hand side) sulphur dioxide maximum annual concentrations:	Response from specialist: The comparison between Scenario 1 and Scenario 3 for maximum annual SO₂ concentrations reflects a technically accurate and realistic assessment, not an inflation of baseline conditions.

			In both figures, the concentrations of SO₂ are extremely low and well below the National Ambient Air Quality Standard (NAAQS) of 50 µg/m³ for annual exposure. This outcome is entirely expected, given that: • Aviation is not a major source of SO₂ emissions, particularly modern aircraft that operate on Jet A-1 fuel with relatively low sulphur content. • The emission inputs for both scenarios were developed using standardised and conservative factors, applied across the entire receptor grid to ensure consistency and precaution. • Scenario 3 exhibits a wider dispersion footprint with concentration levels approximately 2 to 2.5 times higher than those in Scenario 1. This reflects more frequent aircraft operations and a broader mix of aircraft types. However, the absolute concentration levels remain low and do not pose any risk to surrounding receptors. The visual comparison simply confirms that, even at full projected operational capacity, the proposed CWA expansion will not result in material SO₂ exposure. The maps serve their intended purpose—to confirm compliance—and reinforce that air quality impacts related to SO₂ are minimal, localised, and well within safe limits. There is no exaggeration or concealment of impact; rather, the mapping demonstrates that both scenarios maintain environmental acceptability in terms of long-term SO₂ exposure. The AQIA's conclusions remain valid and defensible.
	21.4. Scenario 1 (left hand side) and Scenario 3 (right hand side) sulphur dioxide 1-hour maximum concentrations:		Response from specialist: The 1-hour SO₂ concentration maps for Scenario 1 (left) and Scenario 3 (right) present a credible and scientifically sound comparison of short-term peak exposure under full lawful use and full build-out conditions. The broader dispersion in Scenario 3 is expected due to increased aircraft movements and varied aircraft types. However, this does not indicate a flaw

			or overstatement—rather, it reflects standard worst-case dispersion modelling, which is precautionary by design. Crucially: • All predicted concentrations in both scenarios remain below the 1-hour NAAQS of 350 µg/m³, even in areas of peak exposure. • The red and orange zones depicted in Scenario 3 occur immediately adjacent to the runway and do not extend into residential areas like Bella Riva or Greenville Garden City. • Aircraft emissions contribute only minor amounts of SO₂ relative to other pollutant sources (e.g. industrial combustion), and the conservative modelling ensures that any potential short-term spikes are fully accounted for. Thus, the AQIA has correctly demonstrated that, while the spatial footprint of SO₂ dispersion increases under Scenario 3, it does not pose a significant risk to public health or breach any legal thresholds. The assessment is both technically rigorous and compliant with EIA and NAAQS requirements.
		21.5. Scenario 1 (left hand side) and Scenario 3 (right hand side) sulphur dioxide maximum annual concentrations:	Response from specialist: The comparison of annual SO₂ concentrations between Scenario 1 (left) and Scenario 3 (right) confirms the low significance of SO₂ impacts in both scenarios. The slight increase in plume extent under Scenario 3 is expected due to higher aircraft activity but is well within acceptable environmental and health thresholds. Key points: • Both scenarios show annual SO₂ concentrations significantly below the NAAQS limit of 50 µg/m³. The maximum values presented fall within the lowest range of the model's scale (under 5 µg/m³), indicating a negligible long-term risk.



21.6. Scenario 1 (left hand side) and Scenario 3 (right hand side) particulate matter (PM10) 24-hour maximum concentrations:



- The maps reflect **conservative worst-case dispersion modelling** and assume continuous full operations, which ensures that the actual real-world concentrations are likely even lower.
- Modern jet and turboprop aircraft contribute **very limited SO₂ emissions**, particularly when compared to industrial or energy-generation sources. The AQIA correctly characterises aviation as a **minor contributor** to long-term SO₂ levels.

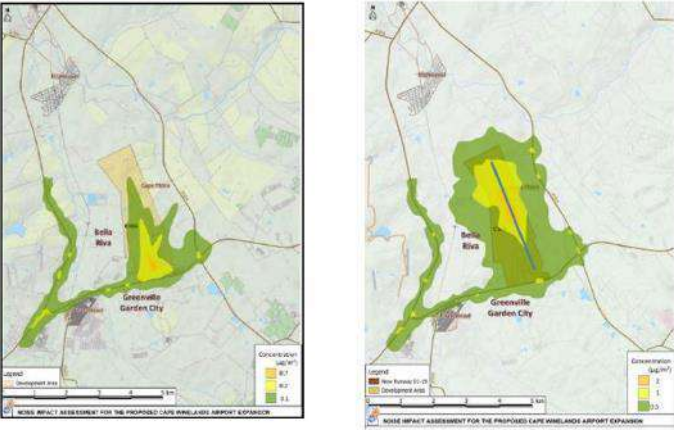
In summary, the maps support—not undermine—the AQIA’s conclusion that **SO₂ impacts from the proposed CWA expansion will remain environmentally acceptable**, even under peak conditions. The comparison is **accurate, precautionary, and consistent with national air quality management standards**.

Specialist response:

The maps comparing PM₁₀ 24-hour maximum concentrations between Scenario 1 (left) and Scenario 3 (right) confirm a **well-constructed and precautionary assessment**, not an overstatement or inflation of the No-Go scenario.

Key observations:

- In both scenarios, **PM₁₀ concentrations remain well below the 24-hour NAAQS of 75 µg/m³**. The concentrations across the mapped area are low, with most areas falling within the **5–20 µg/m³ range**, far beneath regulatory concern levels.
- Aircraft are not primary emitters of PM₁₀. The modelled emissions represent a **minor and localised contribution**, and the broader PM levels seen in Scenario 3 stem from **increased aircraft activity**, not a fundamental shift in pollutant type or severity.
- The wider spread and higher concentrations of the PM₁₀ plume in Scenario 3 are expected, given the increased volume of operations. However, the actual concentration levels **remain negligible**, posing no significant health risk or risk of exceeding regulatory limits.

			It is also worth noting that aviation-related PM emissions typically result from runway dust resuspension and engine combustion, both of which are already conservative in emission factor application within the AQIA. In conclusion, the AQIA has correctly demonstrated that the proposed CWA expansion will not result in any exceedance of PM₁₀ standards. The visual data supports the report's finding that particulate matter impacts are low in intensity, localised, and environmentally acceptable under both operational scenarios.
		21.7. Scenario 1 (left hand side) and Scenario 3 (right hand side) particulate matter (PM_{2.5}) 24-hour maximum concentrations: 	Response from specialist: The comparison between Scenario 1 (left) and Scenario 3 (right) for PM_{2.5} 24-hour maximum concentrations shows a predictable and valid increase in spatial extent in Scenario 3, consistent with the higher frequency of aircraft operations. However, this increase is not indicative of a significant environmental or health concern, and the assessment remains both accurate and precautionary. Key points: • In both scenarios, PM_{2.5} concentrations are well below the 24-hour NAAQS limit of 40 µg/m³. Most of the mapped values fall in the 1–10 µg/m³ range, which is a fraction of the regulatory threshold. • PM_{2.5} emissions from aviation are minimal and typically result from engine combustion and minor runway dust generation, especially under general aviation conditions. The AQIA uses conservative emission factors, ensuring a worst-case projection is applied. • The broader footprint in Scenario 3 reflects cumulative operation effects, not a failure in modelling or an exaggerated No-Go scenario. The absolute concentrations remain extremely low, confirming that even under maximum expansion, the airport will not contribute meaningfully to PM_{2.5} health risks. In conclusion, the visual comparison supports the AQIA's findings: PM_{2.5} levels under both scenarios remain far below national standards, with no risk of

			exceedance at any sensitive receptor, including Bella Riva and Greenville Garden City. The assessment is methodologically sound and confirms the negligible air quality impact of the proposed expansion in relation to fine particulate matter.
		22. The incorrect use of the no-go scenario, whether deliberate or unintentional, flies in the face of sound environmental impact assessments required by NEMA and the EIA Regulations and, by implication, section 24 of the Constitution which requires the securing of ecologically sustainable development. The manner in which the information is presented in the AQIA is therefore disingenuous as it deliberately (or, at best, unintentionally) downplays the impacts associated with the proposed CWA expansion project by making it seem as though the rise in impacts on ambient air quality from the status quo is not as significant as it factually is. This undermines the credibility of the assessment and raises more concerns regarding the potential bias and/or inaccuracies in the analysis undertaken by the specialist in the AQIA.	Response from specialist: • The AQIA transparently models both short-term peak and annual average concentrations for a range of criteria pollutants (e.g. NO₂, SO₂, CO, PM₁₀, PM_{2.5}), using conservative inputs and internationally accepted dispersion models. • It demonstrates that, even under the full build-out Scenario 3, pollutant concentrations remain well below the National Ambient Air Quality Standards (NAAQS), with no exceedances at sensitive receptors such as Greenville Garden City or Bella Riva. • The maps and impact comparisons provided in the AQIA are clear, data-driven, and explain any spatial differences in dispersion based on aircraft activity and atmospheric conditions—not bias. On the contrary, the AQIA reflects a cautious and transparent assessment that upholds the requirements of section 24 of the Constitution by demonstrating that the proposed expansion is consistent with ecologically sustainable development, with air quality impacts that are low, manageable, and compliant with legal thresholds. CWA response: The claim that the Air Quality Impact Assessment (AQIA) is disingenuous or undermines the principles of NEMA and section 24 of the Constitution is misplaced and unfounded. The use of Scenario 1 as the No-Go Alternative reflects a lawful and standard EIA approach. In line with the EIA Regulations and best practice, the No-Go scenario is based not on current operational levels (which may fluctuate over time), but on the full, lawful utilisation of existing infrastructure and rights—in this case, the four runways at Cape Winelands Airport (formerly Fisantekraal

			Airfield) established in 1943. This approach is not only consistent with South African EIA norms but is also aligned with the precautionary principle under NEMA, as it ensures that the proposed project is compared against the maximum environmental footprint legally permissible today. The assertion that the assessment “deliberately downplays” impacts is speculative and unsupported by any technical evidence There is no basis to question the credibility of the AQIA or the specialist involved. The report stands as a defensible, precautionary, and legally compliant analysis that supports informed and balanced environmental decision-making. EAP response: The No Go used in the AQIA is according to the DEA&DP guideline and is described in the EIAR. It portrays the impacts according to the existing rights and forms a basis with which Scenario 2 and 3 are compared. The AQIA is thus credible.
		23. The above is particularly concerning, given the harmful impacts that poor ambient air quality will have on the health and well-being residents of the Greenville Development as Discrete Receptors in terms of the AQIA, such as:	Response from specialist: The Air Quality Impact Assessment (AQIA) specifically identifies Greenville as a Discrete Receptor and thoroughly evaluates pollutant concentrations at that location under both the No-Go and proposed development scenarios. Key points of clarification: • The AQIA models short-term (1-hour and 24-hour) and long-term (annual) exposure to key pollutants, including NO₂, SO₂, CO, PM₁₀, and PM_{2.5}, using conservative emissions inputs and worst-case dispersion assumptions. • In both Scenario 1 and Scenario 3, the predicted concentrations at all Greenville receptor points remain well below the National Ambient Air Quality Standards (NAAQS). This includes receptors as close as 1 km from the runway centreline.

			The modelling explicitly accounts for sensitive land uses, including residential areas like Greenville, to ensure that exposure remains within health-protective limits, as required by section 24 of the Constitution and NEMA. While concerns about air quality and public health are legitimate and taken seriously, the data in the AQIA confirms that the proposed airport expansion will not result in exceedances of health-based air quality thresholds at Greenville or any other surrounding communities. On the contrary, the modelling demonstrates that air quality impacts are low in magnitude, spatially constrained, and do not present a material risk to community health or well-being. Accordingly, the assessment is precautionary, robust, and meets the requirements of both environmental and constitutional law. There is no basis to assert that the health of Greenville residents is being overlooked or inadequately protected.
		23.1. Carbon monoxide reduces oxygen delivery to the body's organs and tissues.	Response from specialist: It is correct that carbon monoxide (CO) can reduce oxygen delivery to the body's organs and tissues at high concentrations, particularly in enclosed or poorly ventilated environments. However, this concern is not relevant in the context of the concentrations predicted in the Air Quality Impact Assessment (AQIA) for the proposed CWA expansion. Key clarifications: - The AQIA includes 1-hour maximum concentration modelling for CO at multiple receptor locations, including the Greenville Garden City development. - The predicted concentrations are orders of magnitude below the South African 1-hour NAAQS limit of 30 mg/m³, with modelled values generally falling below 2 mg/m³ in all scenarios.

			Aviation-related CO emissions are transient and disperse rapidly in open air, especially under typical wind and weather conditions in the region. Therefore, while the general health effects of CO are medically accurate, they are not triggered at the extremely low ambient concentrations associated with this project. The AQIA has demonstrated that CO levels at Greenville and surrounding communities are well within safe and acceptable limits and pose no health risk to residents.
		23.2. Nitrogen dioxide affects both respiratory and immune systems and is referenced as having an adverse impact on the growth of vegetation and agricultural crops.	Response from specialist: It is true that nitrogen dioxide (NO₂), at elevated concentrations, can affect the respiratory system and, over time, influence immune response and vegetation health. However, these effects are associated with prolonged exposure at concentrations significantly higher than those predicted in the Air Quality Impact Assessment (AQIA) for the proposed CWA. Key points of clarification: - The AQIA includes both 1-hour maximum and annual average NO₂ concentration modelling at sensitive receptor points, including Greenville Garden City. - All predicted NO₂ concentrations are well below the South African National Ambient Air Quality Standards (NAAQS): 1-hour standard: 200 µg/m³ - Annual average standard: 40 µg/m³ - In both Scenarios 1 and 3, modelled NO₂ levels at residential and agricultural receptors remain far below these thresholds, ensuring no material risk to human health or vegetation. In addition, the AQIA accounts for conservative emission factors and worst-case dispersion conditions, further ensuring that potential exposure is not understated.

			In summary, while NO₂ is rightly recognised as a pollutant of concern, the assessment demonstrates that levels expected from the proposed CWA operations will not impair public health, agricultural production, or ecological systems. The conclusions are scientifically sound and environmentally defensible.
		23.3. Sulphur dioxide affects the respiratory system and causes irritation of the eyes. “There is a causal relationship between respiratory morbidity and short-term exposure to SO₂”.	Response from specialist: The general statement regarding the health impacts of short-term exposure to sulphur dioxide (SO₂) is medically accurate, but in the context of the proposed Cape Winelands Airport expansion, it is not a cause for concern based on the findings of the Air Quality Impact Assessment (AQIA). Key clarifications: • The AQIA models both 1-hour maximum and annual average SO₂ concentrations at multiple discrete receptors, including Greenville Garden City, using conservative emission factors and worst-case dispersion scenarios. • In all scenarios, the predicted concentrations of SO₂ are well below the NAAQS thresholds, including: ○ 350 µg/m³ for 1-hour exposure ○ 50 µg/m³ for annual exposure • Modelled concentrations typically remain below 5 µg/m³, which is more than 90% below the 1-hour limit, indicating no credible risk of respiratory effects to nearby communities. Moreover, aviation is a minor contributor to SO₂ emissions compared to industrial or combustion-heavy sectors. The conservative assumptions used in the AQIA provide additional assurance that even short-term peaks will not result in adverse health outcomes. Thus, while SO₂ can cause respiratory symptoms under high exposure, the AQIA demonstrates that the levels associated with the proposed CWA

			expansion are negligible and environmentally acceptable under both short- and long-term conditions.
		23.4. Particulate matter (PM₁₀ and PM_{2.5}, specifically) are small enough to penetrate deep into the lungs. “Studies have shown that exposure to PM causes several health effects, which include respiratory and cardiovascular morbidity, e.g. aggravation of asthma, respiratory symptoms and increase in hospital admissions; as well as mortality from cardiovascular and respiratory diseases and lung cancer (WHO, 2013)”.	Response from specialist: The health risks associated with elevated exposure to particulate matter (PM₁₀ and PM_{2.5}) are well recognised, particularly in urban or industrial environments. However, the Air Quality Impact Assessment (AQIA) for the proposed Cape Winelands Airport confirms that the project will not contribute meaningfully to PM exposure levels, and certainly not at levels associated with the health outcomes referenced. Key clarifications: • The AQIA includes modelling for 24-hour maximum concentrations of both PM₁₀ and PM_{2.5} under conservative, worst-case conditions. • In both Scenario 1 and Scenario 3, PM concentrations at all receptor locations remain well below NAAQS limits: ○ PM₁₀: 75 µg/m³ (24-hour) ○ PM_{2.5}: 40 µg/m³ (24-hour) • Modelled concentrations for both pollutants remain in the 5–20 µg/m³ range, which is significantly below levels associated with adverse health effects identified by the WHO. Additionally, aircraft operations are not major sources of particulate matter. Most aviation-related PM arises from runway dust resuspension and engine combustion, both of which are limited in scope and intensity, especially in open-air environments with good dispersion conditions—such as those at CWA. Therefore, while the general health effects of PM exposure are valid, the exposure levels predicted in the AQIA do not present a material health risk to residents of Greenville or surrounding communities. The assessment is conservative, robust, and confirms that the proposed development will remain within safe and acceptable environmental limits.

		Cumulative impacts 24. In response to our previous comments dated 13 January 2025 concerning the failure to include the current and future phases of the Greenville Development in the assessment of cumulative impacts, the EAP stated that: “The AQIA identifies sensitive receptors, including those in Greenville Garden City... and evaluates air quality impacts through dispersion modelling. Emissions from unrelated future developments, such as the approved phases of Greenville, fall outside of the AQIA’s scope and would be addressed under separate environmental approvals”. In this regard we submit the following:	EAP response: The response quoted was statement by CWA and the AQ Specialist and not the EAP.
		24.1. According to the Department of Environmental Affairs and Tourism’s “Cumulative Effects Assessment”, cumulative impact assessment evaluates the combined environmental effects of a project considering the CWA’s interaction with other existing, planned and reasonably foreseeable developments.	Response from specialist: The reference to the DEA / DFFE <i>Cumulative Effects Assessment</i> guideline is noted; however, the Air Quality Impact Assessment (AQIA) for the proposed Cape Winelands Airport (CWA) does comply with its intent. The guideline defines cumulative impact assessment as evaluating combined effects of the project in the context of existing and reasonably foreseeable developments. The AQIA fulfils this by: • Including sensitive receptors in both current and future phases of Greenville, thus accounting for the airport’s cumulative impact on nearby residential areas. • Applying conservative, full-capacity emission modelling, which reflects a precautionary approach consistent with foreseeable long-term operations. • Recognising that the emissions from unrelated future developments, such as the expansion of Greenville itself, fall under separate EIAs, where their own contributions to ambient air quality will be assessed. Thus, the AQIA addresses cumulative exposure from CWA to sensitive receptors, as required. It does not omit the cumulative context—it simply does

			not speculate beyond its scope. This is both methodologically appropriate and compliant with NEMA and DEAT guidance.
		24.2. The emission sources identified in the AQIA under Section 5.3.3 that is headed “Cumulative Assessment”, are limited to the Fisantekraal Wastewater Treatment Works; County Fair Primary Processing Plant; Claytile brick factory; Clay industry brick factory; and ICSA Durbanville crematorium.	Response from specialist: It is correct that Section 5.3.3 of the AQIA identifies several existing point sources (e.g. Fisantekraal Wastewater Treatment Works, County Fair, Claytile, and ICSA Crematorium) in the immediate vicinity for consideration in the cumulative air quality context. However, this does not imply that the assessment is incomplete or flawed. Key clarifications: • These facilities represent known, quantifiable, and currently operational sources—which is the appropriate focus for cumulative assessment under NEMA and the EIA Regulations. • The AQIA’s approach is aligned with the Department of Environmental Affairs’ Cumulative Effects Assessment Guideline, which encourages inclusion of existing and reasonably foreseeable developments, but cautions against speculative assumptions about unbuilt or unapproved activities. • The proposed CWA expansion is assessed for its combined effect with these known emitters, using conservative dispersion modelling, and shows that cumulative concentrations remain below NAAQS thresholds at all sensitive receptors, including Greenville. While the Greenville development may generate future emissions (e.g. from domestic heating or traffic), these are subject to their own environmental approvals and cannot be assumed or modelled in the current AQIA without clear data. The current inclusion of credible, permitted emission sources is therefore both reasonable and compliant with cumulative assessment principles.

		24.3. The attitude of the EAP that “unrelated future developments... fall outside of the AQIA’s scope” begs the question as to what separate environmental approvals will address the cumulative impact on air quality that the proposed CWA expansion project will have in light of the various residential developments surrounding the proposed CWA expansion site (in addition to the various emitters identified above), including the Greenville Development in all its phases?	EAP response: The AQ IA ToR includes <i>Identify and assess potential cumulative ecological impacts resulting from the proposed development, with the proposed and existing developments in the surrounding area</i>: It further states that nearby developments could contribute to a medium negative cumulative impact for Alternatives 2 and 3 and 4, which is an indication that the cumulative impact was assessed. <u>Unrelated</u> future developments cannot be included in the ToR as they have not been approved (ito NEMA legislation) and thus cannot provide clarity on their authorised scope. Response from CWA: The EAP’s statement that “unrelated future developments fall outside of the AQIA’s scope” is both procedurally correct and aligned with EIA principles under NEMA. Each proposed development—such as residential phases of Greenville or other future emitters—is required to undergo its own environmental assessment, which must consider the existing baseline conditions, including the operation of CWA if it is authorised. This reflects the tiered and iterative nature of cumulative impact assessment, where the impacts of one project are carried forward as part of the baseline for the next. It is not the responsibility of the AQIA for the CWA to predict and assess the unknown emissions from future, separately regulated developments, particularly where those projects have not yet commenced or are subject to their own approvals. Thus, there is no gap in accountability—rather, the EIA framework ensures that each approval incrementally builds a cumulative understanding, with competent authorities ensuring integration over time Response from specialist: The AQIA has: • Identified and assessed cumulative exposure from known, existing emission sources; • Modelled sensitive receptors within current and future phases of the Greenville development; and

			Applied conservative assumptions to ensure that its findings remain valid even if surrounding land uses intensify. The AQIA for CWA has met its obligations within its defined scope.
		24.4. We submit that the only place for this kind of assessment (i.e. a cumulative impact assessment that necessarily considers present and reasonably foreseeable developments) is in the context of an EIA process.	EAP response: this comment has been addressed above. Response from CWA: It is agreed that the Environmental Impact Assessment (EIA) process is the appropriate context for evaluating cumulative impacts. However, the assertion that the AQIA fails to meet this obligation is incorrect. The Air Quality Impact Assessment (AQIA) conducted as part of the EIA for Cape Winelands Airport (CWA) does include a cumulative impact assessment, in line with the EIA Regulations and the DEA's Cumulative Effects Assessment guideline. It considers: Existing emission sources in the region (e.g. County Fair, Claytile, crematorium); Sensitive receptors, including current and future phases of Greenville; - And uses conservative, full-capacity emissions modelling to account for long-term operational exposure. What the EIA does not—and cannot—do is speculate on future emissions from other developments not yet operational or approved, such as unbuilt residential phases or unrelated infrastructure. These projects are expected to undergo separate EIAs, where the cumulative baseline would include the approved CWA if authorised. This approach reflects the tiered and sequential nature of cumulative impact management under NEMA, where each project builds on the known baseline to avoid duplication and speculation. The CWA EIA has fulfilled this role

			appropriately, and there is no basis to claim that a cumulative air quality assessment has been omitted.
		24.5. The failure to include a comprehensive cumulative impact assessment, in the sense envisaged by the EIA regime, is a fatal flaw in the assessment process and results in a skewed assessment of cumulative air quality impacts of the proposed CWA.	EAP response: This comment has been addressed above. Response from CWA: The claim that the absence of a “comprehensive” cumulative air quality impact assessment constitutes a fatal flaw is incorrect and misrepresents both the scope and intent of cumulative assessments under the EIA regime. Response from Specialist: The Air Quality Impact Assessment (AQIA) for the Cape Winelands Airport (CWA) project includes a cumulative assessment that is fully aligned with the requirements of the EIA Regulations. It specifically accounts for: • All known, existing and quantifiable emission sources in the surrounding area (e.g. County Fair, Claytile, Fisantekraal WWTW, ICSCA Crematorium); • The proposed airport’s full operational scenario using conservative emissions modelling; and • Sensitive receptors, including the current and future phases of the Greenville Development. The omission of unbuilt or unapproved developments from direct emissions modelling is not a flaw—it is a methodologically and legally appropriate limitation. Future developments are expected to conduct their own EIAs, incorporating the cumulative impacts of CWA as part of their baseline, consistent with the tiered and iterative approach built into the EIA framework.

			Therefore, the AQIA's cumulative assessment is comprehensive within its scope, and there is no basis to conclude that it skews the results or undermines the integrity of the EIA. The approach taken is both precautionary and procedurally sound and does not represent a fatal flaw.
		24.6. The statement further admits that the Greenville Development is considered by the EAP to be a future development and therefore falls within what must be considered in the context of a sound and legally defensible cumulative impact assessment (i.e. existing, planned and reasonably foreseeable developments).	EAP response: this comment has been addressed above. Response from specialist: Greenville was explicitly included as a sensitive receptor in the Air Quality Impact Assessment (AQIA), including receptors representing both developed and undeveloped phases. The EIA Regulations and the DEA / DFFE Cumulative Effects Assessment guideline require consideration of existing and reasonably foreseeable developments, and the AQIA satisfies this by: • Including receptor locations within and adjacent to the full Greenville footprint, even for areas not yet built; • Applying conservative full-capacity emissions from the proposed Cape Winelands Airport (CWA) to assess long-term and peak air quality impacts; • Confirming that all pollutant concentrations remain within National Ambient Air Quality Standards (NAAQS) at Greenville and surrounding receptors. The cumulative impact of the CWA on Greenville has therefore been assessed in accordance with legal requirements and EIA best practice. The fact that Greenville's later phases are still to be developed does not exempt the CWA assessment from considering them—it simply requires that they be treated as receptors, not emission sources, which the AQIA has done appropriately. There is no inconsistency or flaw—Greenville has been rightly considered within the cumulative exposure framework, ensuring the assessment is sound and legally defensible.

		Failure to consider air quality impacts of the proposed CWA on future phases of the Greenville Development 25. The failure to quantify, evaluate and assess the impact of the proposed CWA on the completed phases of the Greenville Development as well as future phases is a fatal flaw in the EIA process for the proposed CWA. We do not agree that leaving this crucial issue to monitoring and adaptive management would suffice for the overall purpose of the EIA regime, as per your response “Any outstanding concerns can be addressed through adaptive management, monitoring, and stakeholder engagement during project implementation”. All this response means is that impacts that necessarily form part of the impact assessment process have not been assessed, and that this constitutes a fatal flaw in the EIA process for the proposed CWA.	EAP response: The comment on assessment of completed and future phases has been addressed above. It is pre-emptive to force the consideration of adaptive management, monitoring, and stakeholder engagement, that should occur during project implementation, to be considered at this stage. All identified impacts have been assessed. Response from CWA: The claim that the EIA for the proposed Cape Winelands Airport (CWA) fails to assess air quality impacts on the completed and future phases of the Greenville Development is incorrect and unfounded. The Air Quality Impact Assessment (AQIA) includes receptor points within the current and future footprint of the Greenville Garden City development. These receptors are used in the dispersion modelling to evaluate both short-term (e.g. 1-hour, 24-hour) and long-term (annual average) pollutant concentrations. The results demonstrate that, even under the full build-out scenario (Scenario 3), pollutant concentrations at Greenville remain well below the applicable National Ambient Air Quality Standards (NAAQS). The reference to adaptive management acknowledges that post-authorisation mechanisms (such as monitoring and stakeholder engagement) are part of the standard and legally recognised EIA framework—especially in long-term, phased infrastructure projects like airports, where conditions and surrounding land uses evolve over time. In summary: • The completed and future phases of Greenville were considered as sensitive receptors; • The AQIA shows that CWA operations will not result in pollutant levels exceeding legal health thresholds at Greenville;

			• Adaptive management is a recognised tool to refine mitigation and ensure continued compliance, not a substitute for impact assessment. Therefore, there is no fatal flaw. The assessment is compliant, precautionary, and appropriately scoped under the EIA Regulations.
	26. With respect to the statement in the AQIA that “the sensitivity in the immediate vicinity of the site is considered low, since there are no residential areas bordering the CWA airport site” we submit the following:		-
	26.1. This position creates a misleading understanding of the impacts of the proposed CWA expansion project on a residential development like the Greenville Development which, from an air quality perspective, is certain to face increased levels of criteria pollutants of concern that are harmful to human health and well-being.		Response by specialist: The statement in the AQIA that “the sensitivity in the immediate vicinity of the site is considered low, since there are no residential areas bordering the CWA airport site” is a factual observation regarding immediate proximity, not an attempt to downplay the significance of air quality impacts on surrounding communities such as Greenville. The term “immediate vicinity” refers specifically to the land directly adjacent to the airport boundary, which at present is not occupied by residential development. Furthermore, the bulk of the land immediately south of the airport—identified by Garden Cities as Remaining Extent of Portion 4 (Rem. Ptn 4), measuring 384.42 hectares—has had its development rights lapse. As a result, any future residential development on this portion would require a new Environmental Impact Assessment (EIA) and associated environmental approvals. Despite this, the AQIA does not disregard Greenville. It includes discrete receptors located within both completed and potential future phases of the Greenville Garden City development, some within 1 km of the runway, and uses these to model air quality exposure. Under full operational conditions (Scenario 3), the results show that all pollutant concentrations at Greenville remain well below the National Ambient Air Quality Standards (NAAQS), indicating no unacceptable health risk.

			Therefore, the AQIA's reference to low sensitivity in the immediate vicinity is accurate and context-specific , and the broader impact on nearby residential areas like Greenville has been properly assessed, modelled, and presented in a legally and scientifically sound manner .
		26.2. This position reinforces the overall approach in the AQIA that the future phases of the Greenville Development will not be considered when determining the impact of the proposed CWA on ambient air quality in the area.	Response from specialist: The statement regarding low sensitivity in the immediate vicinity of the airport does not imply exclusion of the future phases of the Greenville Development from the Air Quality Impact Assessment (AQIA). The AQIA includes discrete receptors located within both developed and future phases of Greenville. Key clarifications: • The modelling grid used in the AQIA covers a broad area and includes sensitive receptor points within the full Greenville footprint, extending beyond current development to include areas identified for future phases. • These receptor points were used to assess exposure to all relevant pollutants (e.g. NO₂, SO₂, CO, PM₁₀, PM_{2.5}) under both current and full-build operational scenarios. • Results show that even under worst-case emissions modelling, predicted pollutant concentrations at these receptors remain well below NAAQS thresholds, ensuring the health and well-being of future Greenville residents is protected. Therefore, the claim that future phases of Greenville were not considered is incorrect. They were appropriately assessed as receptors of impact, and there is no basis to conclude that the AQIA has overlooked or excluded these areas. The approach is both precautionary and legally compliant.
		26.3. This attitude dismisses the future reality of nearby residential developments that will be forced to live under conditions of poor ambient air quality and undermines the importance of the Greenville	Response from specialist:

		Development as a growing urban area, and the value ascribed to the health and well-being of future Greenville residents.	The AQIA includes receptor points within both current and planned phases of the Greenville Development, ensuring potential exposure is properly assessed. Modelling was based on conservative, worst-case emissions under full airport operations, and results show that pollutant concentrations remain well within NAAQS limits at Greenville. There is no evidence of poor ambient air quality or health risks to future residents. The assessment appropriately recognises Greenville as a growing urban area and ensures the health and well-being of its residents are protected.
		26.4. The assumption that buffer zones will be appropriately implemented is speculative rather than concrete, leaving critical air quality concerns unaddressed.	Response from specialist: The use of buffer zones is a standard and widely accepted planning and environmental management tool, particularly around airports. In this case, buffer zones are proposed as part of an integrated land use strategy—not as a substitute for impact assessment, but as a complementary risk mitigation measure. Key clarifications: • The Air Quality Impact Assessment (AQIA) does not rely solely on buffer zones; it models pollutant concentrations at actual sensitive receptors, including within the Greenville Development area. • The modelling results show that even without relying on buffer zones, air quality levels remain within National Ambient Air Quality Standards (NAAQS) at all assessed locations. • Implementation of buffer zones will be formalised through land use controls and zoning mechanisms, particularly as surrounding developments (e.g. Greenville’s future phases) come forward for their own approvals. Thus, buffer zones are not speculative—they are part of spatial planning policy and development control. Air quality concerns have been directly

			assessed and addressed through conservative modelling and regulatory thresholds, not assumptions.
		27. The EAP asserts that the Greenville Development’s future phases would not commence construction until 2067 based on an in-house, bias calculation of previous developments, suggesting that air quality concerns remain distant. This argument fails to reflect real-world urban development dynamics, where market demand, policy shifts, and investment patterns can accelerate project timelines significantly. In this regard we note the following:	EAP response: Note the statement quoted was made by the CWA and specialist and not the EAP. The calculations by CWA were based on information received from Garden Cities. Response from CWA: The reference to the year 2067 is not a fixed or speculative dismissal of future air quality concerns—it is a forward calculation based on a simple extrapolation of Greenville’s historical pace of development. The date is derived by taking the number of residential units constructed to date and projecting that rate over the remaining number of approved units, not as a forecast but to illustrate expected phasing. Importantly: • This projection has no bearing on whether or how air quality impacts are assessed. The Air Quality Impact Assessment (AQIA) includes receptor points within the full footprint of Greenville, including areas identified for future development. • The AQIA models pollutant concentrations at these points using conservative emissions and worst-case dispersion, assuming full CWA operations, regardless of when Greenville’s future phases are developed. • The results show that air quality will remain well within NAAQS thresholds at Greenville under all scenarios—even if development occurs sooner than estimated. Therefore, the timeline is a planning reference, not an analytical limitation. The assessment appropriately includes future receptors and confirms that no

			unacceptable air quality impacts will arise, regardless of when residential build-out occurs.
		27.1. Delays in certain phases do not eliminate long-term development plans that have been in existence for decades, meaning air quality impacts must be considered proactively in light of concretely foreseeable future development rather than dismissed based on speculative and bias timelines.	Response from specialist: The AQIA does not dismiss future phases of Greenville based on speculative timelines. It includes receptor points across both current and future development areas, and models worst-case emissions under full airport operations, regardless of when those phases are built. CWA response: The 2067 reference is simply a factual extrapolation based on Greenville’s historic development rate, not a justification for omission. Air quality impacts have been proactively and conservatively assessed for foreseeable future <u>approved</u> development, in full compliance with EIA requirements.
		27.2. By assuming such a distant timeframe, the AQIA deliberately (or, at best, unintentionally) underestimates near-term environmental pressures inherent in residential developments that necessarily require consideration as part of the environmental impact assessment for the proposed CWA.	EAP response: Note: the AQIA does not refer to any timeframe in terms of future development. The assumption by the IAP is incorrect. Response from CWA: The AQIA does not rely on the 2067 projection to assess air quality impacts, nor does it use it to defer consideration of near-term environmental pressures. The year 2067 is simply a neutral, forward projection based on Greenville’s actual delivery rate to date and is used for context, not impact exclusion. Critically, the AQIA includes sensitive receptors in both existing and future Greenville phases and models air quality using conservative, full-capacity emission scenarios for the proposed CWA—regardless of development timing.

			Therefore, there is no underestimation of near-term impacts . The assessment captures both current and foreseeable exposure risks, making it a precautionary and legally defensible evaluation of environmental pressures associated with the airport expansion.
		Mitigation measures 28. The AQIA still does not contain any mitigation measures for potential impacts on ambient air quality caused by the proposed CWA. This is despite Appendix B to the AQIA (the “Impact Assessment Methodology”) specifically requiring the identification and description of “practical mitigation and optimisation measures” to be included as part of the AQIA.	Response from EAP: The claim that the AQIA contains no mitigation measures is incorrect. While the AQIA focuses primarily on modelling and evaluating pollutant concentrations, it is integrated within the broader EIA framework, where mitigation is included in the AQIA and the EMPr including a Noise and Air Quality Mitigation and Monitoring Plan post-authorisation. Key points: • The AQIA demonstrates that predicted pollutant levels remain below National Ambient Air Quality Standards (NAAQS) even under full operational conditions. • The proposed mitigation includes: ○ Operational phasing and flight scheduling to avoid unnecessary congestion, ○ Use of more efficient, low-emission aircraft through market and operational incentives, ○ Implementation of buffer zones and land use controls, ○ Monitoring commitments to track actual emissions and receptor exposure over time. The low impact rating confirms that ambient air quality can be maintained within legal limits without requiring engineered or intensive interventions. The assessment remains legally compliant and environmentally responsible.
		29. The EAP defends the AQIA’s lack of defined mitigation strategies by stating that “the identification of the most suitable and cost-effective mitigation measures,	EAP response:

		together with a realistic time schedule for their application, can only be a result of consultations between the various stakeholders associated with all the airport operations". This does not justify the failure to present concrete mitigation proposals upfront as a necessary pre-requisite to any environmental impact assessment. Stakeholder discussions may be valuable but delaying mitigation planning until future consultations leave key environmental risks unresolved and means that a decision maker is not presented with a full understanding of project impacts and measures to combat those impacts prior to coming to a decision. Without these elements, the AQIA lacks the credibility needed to ensure effective air quality management and to inform a decision based on same.	This comment has been addressed above. The AQ specialist and other specialists will be involved in future development of mitigation measures as needed. Air Quality Mitigation measures are included in the EMPr (Section 2.2.2) which becomes the on-site management and auditing document post authorisation. Mitigation is included for construction and for operational phases. Development of additional mitigation at later stages of the development is allowed for and will be in consultation with the air quality specialist. Further mitigation measures development is only possible once the flights paths and detail on operators at the CWA is determined, which will only follow once an EA is issued, as it is a follow-on process through SACAA outside of the NEMA process. Mitigation development will be through stakeholder engagement (airline operators, CWA, adjacent landowners included) and result in a possible update to the EMPr at that stage. Response from CWA: The statement regarding stakeholder consultation for finalising mitigation measures does not imply that mitigation is absent—only that certain site-specific, operational, and stakeholder-informed measures will be refined and formalised post-authorisation through tools such as the Environmental Management Programme (EMPr) and the Air Quality Mitigation and Monitoring Plan. This approach is consistent with the phased nature of large infrastructure development, where certain technical, logistical, and regulatory decisions (such as airspace design and tenant mix) will only be finalised during implementation. The assessment, therefore, presents sufficient, precautionary mitigation planning to support informed decision-making, while building in flexibility to refine actions in consultation with relevant stakeholders and authorities. There is no failure or gap—only a realistic and legally compliant approach to progressive mitigation planning.

			Response from specialist: • The Air Quality Impact Assessment (AQIA) already demonstrates that pollutant concentrations—under full operational conditions—are predicted to remain well below National Ambient Air Quality Standards (NAAQS) at all receptors, including Greenville. This significantly reduces the need for extensive upfront engineered mitigation. • Mitigation measures are addressed through a combination of: ○ Operational strategies (e.g. flight phasing, use of efficient aircraft, movement restrictions if needed), ○ Planning tools (e.g. buffer zones, land use controls), ○ And most importantly, ongoing monitoring, which ensures that mitigation can be adaptively managed and enforced. The AQIA provides the CA with the necessary information to evaluate the impact in full.
		30. It is wholly inadequate to state that “the most suitable and cost-effective mitigation measures should be investigated, and an acceptable implementation timeframe should be established before the new runway reaches its capacity”, for various reasons:	EAP response: This comment has been addressed above. The AQ specialist and other specialists will be involved in future development of mitigation measures as needed. Air Quality Mitigation measures are included in the EMPr (Section 2.2.2) which becomes the on-site management and auditing document post authorisation. Mitigation is included for construction and for operational phases. Development of additional mitigation at later stages of the development is allowed for and will be in consultation with the air quality specialist.
		30.1. The determination of mitigation measures at the point of the project where the CWA is just about to reach capacity is unacceptable and	EAP response: This comment has been addressed above. The AQ specialist and other specialists will be involved in future development of mitigation measures as

		entirely at odds with the proactive approach to environmental management envisaged by the EIA regime and the mitigation hierarchy.	needed. Air Quality Mitigation measures are included in the EMPr (Section 2.2.2) which becomes the on-site management and auditing document post authorisation. Mitigation is included for construction and for operational phases. Development of additional mitigation at later stages of the development is allowed for and will be in consultation with the air quality specialist. Response from CWA: The statement that mitigation should be refined and implemented before the new runway reaches capacity is not a deferral of environmental responsibility, but rather a phased and precautionary approach in line with the scale and timing of the project's impacts. Key points: • The Air Quality Impact Assessment (AQIA) already demonstrates that air quality impacts—even at full operational capacity—are within acceptable thresholds under the National Ambient Air Quality Standards (NAAQS), with no exceedances predicted at sensitive receptors such as Greenville. • Given this, the need for extensive mitigation is low at early operational stages, and the recommendation to refine and scale mitigation measures before full capacity is reached reflects an adaptive and demand-driven approach, not an omission. • This approach is aligned with the mitigation hierarchy, which prioritises avoidance and minimisation—both already achieved through conservative project design and airspace management—and allows for responsive management as monitoring data becomes available. In large, long-term infrastructure projects like CWA, it is standard practice to implement certain mitigation measures in phases, ensuring they are fit for purpose and cost-effective. This does not undermine the EIA process—it strengthens it by ensuring mitigation is proportional, timely, and informed by actual conditions, not speculation.

		30.2. The reason for inclusion of mitigation measures at this stage is to ensure that the specialist, being the most suitable individual familiar with the project and the air pollution field and who is responsible for drafting the AQIA, is involved in the development of those measures.	EAP response: This comment has been addressed above. The AQ specialist and other specialists will be involved in future development of mitigation measures as needed. Air Quality Mitigation measures are included in the EMP (Section 2.2.2) which becomes the on-site management and auditing document post authorisation. Mitigation is included for construction and for operational phases. Development of additional mitigation at later stages of the development is allowed for and will be in consultation with the air quality specialist. Response from CWA: The involvement of the air quality specialist in the identification of mitigation measures is acknowledged and appropriately reflected in the EIA process. However, the purpose of the specialist's role at this stage is to assess whether impacts are significant and require mitigation—not necessarily to prescribe every operational or site-specific measure in detail. Key points: • The specialist has already fulfilled this role by demonstrating, through the AQIA, that predicted pollutant levels remain well within National Ambient Air Quality Standards (NAAQS), even under full operational conditions. • Given the low impact significance, the mitigation measures identified thus far (e.g. flight scheduling, efficient aircraft, buffer zones, and monitoring) are appropriate at this stage and proportionate to the risk. • The refinement of mitigation measures is not excluded from the specialist's involvement—it is intended to occur during the development of the Air Quality Mitigation and Monitoring Plan, which the specialist can contribute to during the post-authorisation

			phase, when operational parameters and stakeholder inputs are better defined. This approach ensures that mitigation is realistic, responsive, and enforceable, and does not exclude the specialist, but rather provides for their continued role where it will be most effective. There is no procedural flaw—only a practical, phased application of the mitigation hierarchy.
		30.3. This stance promotes unsustainable development, as a scramble to determine mitigation measures just before the project reaches capacity is at a point where the horse has bolted and it is unlikely that these measures will in any way be effective.	EAP response: This comment has been addressed above. Response from CWA: The suggestion that deferring finalisation of certain mitigation measures until later project phases promote unsustainable development is incorrect and overlooks the precautionary, phased planning approach standard in complex infrastructure projects like airports. Key points: • The Air Quality Impact Assessment (AQIA) demonstrates that, even under full build-out conditions, pollutant concentrations will remain well within National Ambient Air Quality Standards (NAAQS). This indicates that the project is already sustainable from an air quality perspective, even without additional mitigation. • The reference to mitigation being refined “before the runway reaches capacity” does not imply last-minute implementation. It reflects a logical phasing strategy, ensuring mitigation is responsive to actual conditions and proportional to operational scale. • This approach allows for ongoing monitoring and adaptive management, which are recognised tools under NEMA to promote sustainability, not undermine it. Therefore, there is no “scramble” or reactive delay. The EIA adopts a forward-looking, measured approach, ensuring mitigation remains relevant, cost-effective, and enforceable—key features of truly sustainable development.

		30.4. This approach promotes reactive environmental management in circumstances in which human health and well-being stand to be severely impacted.	EAP response: This comment has been addressed above. Response from CWA: Labelling the AQIA's approach as "reactive" misrepresents the intent and structure of the assessment. The mitigation strategy is not reactive, but rather a phased and proactive approach, guided by conservative modelling that already shows compliance with NAAQS at all sensitive receptors. Ongoing monitoring and adaptive management ensure that mitigation is responsive, not delayed, allowing for timely intervention if future data warrants it. This is a standard and precautionary framework, not a reactive one.
		30.5. Interested and affected parties have been deprived of an opportunity to meaningfully understand and contribute to the development of mitigation measures aimed at addressing the impacts of the proposed CWA on ambient air quality.	EAP response: This comment has been addressed above. Mitigation measures are included in the AQIA and EMPr at this point. Further mitigation measures development is only possible once the flights paths and detail on operators at the CWA is determined, which will only follow once an EA is issued, as it is a follow-on process through SACAA outside of the NEMA process. Mitigation development will be through stakeholder engagement (airline operators, CWA, adjacent landowners included) and result in a possible update to the EMPr at that stage. Response from CWA: The claim that interested and affected parties (I&APs) have been deprived of a meaningful opportunity to engage with air quality mitigation is unfounded. Key points:

			• The Air Quality Impact Assessment (AQIA) was made publicly available during the statutory commenting period, including its findings, assumptions, and identified potential mitigation strategies. • I&APs were invited to submit comments, raise concerns, and propose inputs, all of which are documented in the Comments and Responses Report, demonstrating transparency and responsiveness. • The EIA process is ongoing and includes a commitment to develop a detailed Air Quality Mitigation and Monitoring Plan (AQMMP), which will involve continued engagement with stakeholders, ensuring that mitigation measures remain inclusive and responsive. Thus, I&APs have had—and will continue to have—ample opportunity to contribute meaningfully to how air quality is managed. There has been no exclusion or procedural shortfall.
		30.6. Stakeholders are unable to gauge or ascertain whether the proposed CWA is compatible with sustainable development in terms of section 2(4) of NEMA.	Response from CWA: Stakeholders are not prevented from gauging the sustainability of the proposed CWA—on the contrary, the Air Quality Impact Assessment (AQIA) and broader EIA process provide clear, measurable evidence of the project’s compatibility with sustainable development principles. EAP response: This comment has been addressed above. The AQIA demonstrates that air pollutant concentrations will remain below National Ambient Air Quality Standards (NAAQS), even under full operation, indicating no significant harm to human health or the environment. The project follows a phased, adaptive management approach which promotes flexibility and continuous environmental responsibility.

			The EIA includes stakeholder participation, conservative modelling, and impact mitigation strategies—all designed to ensure the project aligns with the principles of ecologically sustainable development. Accordingly, the information provided enables stakeholders and the CA to assess the sustainability of the proposed project.
		30.7. From a compliance and enforcement perspective, the development of mitigation measures at the EIA phase of the project is essential as these measures will then be included into an EMPr to which the developer will be bound to comply. There is no assurance to the public that mitigation measures will even be developed at a later stage, let alone enforced.	EAP response: This comment has been addressed above. Mitigation measures are included in the AQIA and EMPr at this point. Further mitigation measures development is only possible once the flights paths and detail on operators at the CWA is determined, which will only follow once an EA is issued, as it is a follow-on process through SACAA outside of the NEMA process. Mitigation development will be through stakeholder engagement (airline operators, CWA, adjacent landowners included) and result in a possible update to the EMPr at that stage. Compliance to the EMPr and EA conditions are audited at an interval as stipulated by the EMPr. Response from CWA: The concern about enforceability is addressed through the EIA process itself. While some mitigation measures will be refined post-authorisation, the EIA already commits to the development of a detailed Air Quality Mitigation and Monitoring Plan (AQMMP), which will be incorporated into the Environmental Management Programme (EMPr)—a legally binding document. Key points: • The EMPr is a condition of environmental authorisation under the EIA Regulations and must be complied with by the developer. Failure to do so would constitute a breach subject to enforcement by the competent authority.

			• The AQIA already confirms that air quality impacts will remain within legal thresholds, but still recommends monitoring and adaptive mitigation, demonstrating a precautionary, enforceable framework. • The requirement for post-authorisation refinement does not undermine compliance—it reflects the reality of phased infrastructure development and allows for mitigation to be tailored based on actual operating conditions and stakeholder input. Thus, the process ensures that mitigation measures will be both developed and enforceable, and there is no gap in public assurance or regulatory oversight.
		30.8. The deference of mitigation measures to a point in the future, and which is subject to stakeholder engagement and cost-effectiveness, is contrary to Appendix 6 of the EIA Regulations which states that “a specialist report prepared in terms of these Regulations must contain...any mitigation measures for inclusion in the EMPr” (own emphasis).	EAP response: This comment has been addressed above. Mitigation measures are included in the AQIA and EMPr at this point. Further mitigation measures development is only possible once the flights paths and detail on operators at the CWA is determined, which will only follow once an EA is issued, as it is a follow-on process through SACAA outside of the NEMA process. Mitigation development will be through stakeholder engagement (airline operators, CWA, adjacent landowners included) and result in a possible update to the EMPr at that stage. Response from CWA: The AQIA is compliant with Appendix 6 of the EIA Regulations, which requires that a specialist report include “any mitigation measures for inclusion in the EMPr”. The regulation does not require all mitigation to be fully specified upfront, but rather that it be identified where relevant and capable of being integrated into the EMPr. Key clarifications: • The AQIA includes recommended mitigation and monitoring commitments, such as buffer zones, phasing, and air quality

			monitoring, which are intended to be incorporated into the EMPr and further detailed through the Air Quality Mitigation and Monitoring Plan (AQMMP). - Given that the AQIA concludes that predicted emissions are well within NAAQS thresholds, the extent of required mitigation is limited—nonetheless, precautionary and enforceable mitigation actions are already outlined. - The future refinement of measures through stakeholder engagement and cost-benefit evaluation does not negate compliance—it reflects a phased and adaptive planning approach appropriate to a project of this scale and complexity. In short, the AQIA satisfies the requirements of Appendix 6 by identifying relevant mitigation for the EMPr, while allowing for practical, flexible implementation that remains legally enforceable.
		General comments 31. With respect to the amendment to the section on the Bio-digester Plant where it is stated that “the use of poultry manure was initially considered but is no longer a viable option; therefore, references to its usage in this section are no longer relevant”. Does this not make the section on a Bio-digester Plant moot? Why is this no longer a viable option? Why has the removal of chicken manure not impacted the calculation of stationary sources of emissions on page 4-1?	EAP response: Please refer to comments received by IAP County Fair and their concerns regarding the use of chicken manure in the biodigester (Appendix 29C to the amended draft EIAR). The chicken manure is not the only feed considered for the biodigester, so the removal of it as a feed source does not make the biodigester non-feasible and it remains in the scope of the proposed project. Response from CWA: The amendment stating that poultry manure will no longer be used in the proposed bio-digester plant does not render the section on the plant moot. The bio-digester may still be used for other organic feedstock, and its inclusion reflects a precautionary and flexible planning approach. Key clarifications: The removal of poultry manure simply excludes one potential input, not the entire concept of on-site waste-to-energy treatment. Other

			viable organic inputs may still be considered in future detailed design phases. • The removal of chicken manure as a feedstock is not expected to materially affect stationary source emissions, as poultry waste was not a significant emissions contributor in the baseline calculations. This is why the figures in Section 4.1 remain unchanged. • The amendment demonstrates transparency in updating the assumptions of the project and ensuring consistency between planning components. It does not indicate an oversight, but rather a refinement of the project scope based on feasibility. In summary, the change is clearly communicated and has no material impact on air quality modelling outcomes, nor does it undermine the integrity of the AQIA. Specialist Response: Poultry manure was initially evaluated as a potential feedstock. However, due to concerns about odour impacts associated with its storage and handling, it was excluded from the final design. As a result, emissions such as ammonia (NH₃), odorous volatile organic compounds (VOCs), and particulate matter (PM), which are typically linked to manure storage, are no longer relevant to the CWA's emissions profile. The Bio-digester itself is a sealed anaerobic system, inherently minimising fugitive emissions. Its primary emissions arise from the controlled combustion of biogas, which were quantified using standard EPA AP-42 emission factors for biogas-fired engines or boilers, ensuring conservative, industry-accepted estimates. Since the Bio-digester remains part of the project, these combustion emissions continue to be applicable and were incorporated into the cumulative stationary source emissions assessment. Accordingly, the removal of poultry manure did not affect the stationary combustion source emission calculations presented on page 4-1, as these calculations were already based on the confirmed, odour-optimised feedstock mix and the closed-process design. Despite this change, the section on the Bio-

			digester Plant remains relevant, as the facility is still planned to process other low-odour organic waste streams, thereby upholding its role in on-site waste management and renewable energy generation. Please note that page 4-1 referenced is incorrect, as the page numbering was inadvertently reset at Section 4.2.3. The correct page number should have been 4-11, with all subsequent pages renumbered accordingly up to Section 5. This has been corrected in the report.
		32. With respect to the new section on Fugitive Sources: How can the specialist come to the conclusion that “the above-mentioned emissions are very small and are considered insignificant” in the same paragraph in which they state that “no specific information for the locations and their quantities was available and as such these emissions were not quantified”? The conclusion is not rationally connected to the fact that the impacts of the fugitive sources have not been quantified and assessed, which brings the overall credibility of the AQIA into question.	EAP response: The statements and conclusions are made by a specialist within a specialist report and are deemed acceptable and credible.
		33. The various harmful impacts that the criteria pollutants of concern have on human health as well as agricultural activities further emphasises the incompatibility of the proposed CWA with the surrounding land uses which are largely residential (Greenville Development, Fisantekraal, Klipheuwel and Bella Riva) and agriculture.	EAP response: The amended draft EIAR states: <i>The Air Quality IA concluded that the expected impact of the vehicle and equipment exhaust emissions is considered to be insignificant. The total dust deposition beyond a 200m zone from the site is expected to be well below the DEA guideline of 600mg/m²/day for residential areas, resulting in an insignificant impact after mitigation. The residual impact related to nuisance factors will be very low negative for Alternative 1, and low negative for Alternatives 2 and 3 and 4. Nearby developments could contribute to a medium negative cumulative impact for Alternatives 2 and 3 and 4.</i> Response from CWA: The Air Quality Impact Assessment (AQIA) has taken a conservative approach, including both existing and potential future receptors, and demonstrates that air pollutant concentrations will remain well below NAAQS limits at all locations—residential or agricultural.

			The surrounding land uses are a blend of established agricultural and limited residential development, with much of the area still undeveloped or requiring new environmental approvals, and zoned agricultural: • “Fisantekraal”, as it is effectively known as, is the only part of the Greenville Development that is currently built and inhabited. The remainder of Greenville—particularly the 384.42-hectare Rem. Portion 4—has reverted to agricultural land, as development rights have lapsed, and any future construction would require a new EIA process. Future phases of Greenville are outside of the urban edge and are still zoned as agricultural. • Bella Riva is also agricultural in its current state. Its original approvals are set to lapse, and the developers have submitted a new EIA that now explicitly considers the presence of CWA. • Klipheuwel, cited as another residential node, is located approximately 6 km from CWA, beyond the zone of measurable impact for pollutants such as NO₂, SO₂, and PM, as confirmed by the AQIA. Therefore, the argument not only conflates incompatible concerns, but it also misrepresents the current land use context, which the AQIA has already addressed in a measured, legally sound, and precautionary manner.
		NEED AND DESIRABILITY 34. The majority of the amended DEIR focuses on the potential stimulation of economic growth and employment opportunities. In Section 5 of the amended DEIR, which discusses need and desirability, the EAP cherry-picks for their policies, plans, and strategies which are all found to be extremely positive, taking no regard to portions of the report which conflicts with their positive portrayal of the development.	EAP response: The IAP is unclear to which policies, plans, strategies were cherry picked by the EAP. The inclusion of sections of the report that conflicts with this apparent positive portrayal are included by the EAP as stated by the IAP, to provide a holistic picture. Response from CWA:

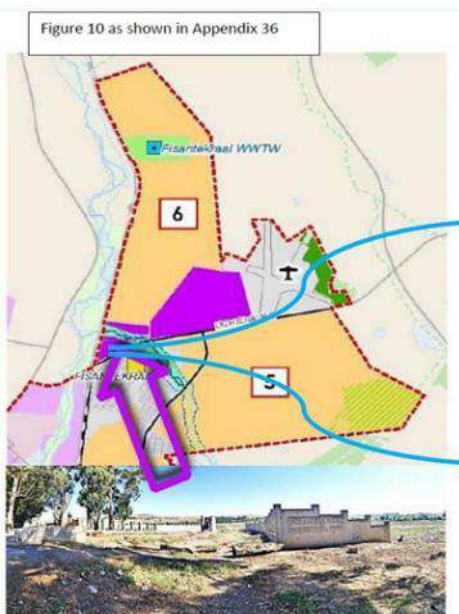
			The claim that the amended DEIR selectively presents a positive view of the proposed CWA by “cherry-picking” policies is unfounded and overlooks the structure and intent of the Need and Desirability assessment in Section 5. Key clarifications: • The DEIR follows the requirements of the EIA Regulations, which explicitly direct the EAP to assess the project’s alignment with applicable spatial plans, strategic frameworks, and national development policies. The analysis references a wide range of sources—including the MSDF, PSDF, IDPs, National Development Plan, and aviation sector strategies—to determine alignment. • The emphasis on economic growth, employment creation, and regional infrastructure needs reflects the policy intent of these documents. These are legitimate and material considerations in the need and desirability determination, particularly for a nationally significant infrastructure project. • Where there are concerns or uncertainties—such as environmental sensitivity or land use compatibility—these are addressed elsewhere in the DEIR, including in the specialist studies and risk assessments. The purpose of the need and desirability section is not to restate all impact risks but to evaluate whether the project serves a broader public interest and aligns with strategic planning objectives. Thus, the DEIR provides a balanced, policy-driven justification for the proposed CWA. The process is transparent, procedurally correct, and inclusive of risks and benefits, enabling the competent authority to make an informed decision. There is no evidence of selective reporting.
		35. Section 5 is littered with over-the-top descriptions such as that CWA will "create a positive impact on the environment by reducing the carbon footprint resulting from air travel into the region" and "prioritising people, planet and profit". The EAPs tendency to exaggerate the potential and largely economical centred benefits of the proposed CWA can and must be construed as being	EAP response: The statement included <i>create a positive impact on the environment by reducing the carbon footprint resulting from air travel into the region</i> is based on technical input from specialists (refer Appendix 15 to the amended draft EIAR). The statement <i>prioritising people, planet and profit</i> is a strategic viewpoint of the applicant and forms the basis for the CWA focus on design

		typified in marketing material with a clear indication of bias instead of objective findings on an independent environmental practitioner.	and operation with climate change in mind (inclusive of the use of renewable energy, development of water sources and other sustainable measures as included in the amended draft EIAR). Response from CWA: The language used in Section 5 of the DEIR reflects the purpose of the “Need and Desirability” assessment, which is to present the project’s strategic value, sustainability alignment, and long-term benefits—not promotional material. Statements such as the proposed CWA potentially “creating a positive impact on the environment by reducing the carbon footprint” are not overstatements. They are based on aeronautical performance modelling, which shows that the introduction of a closer alternate airport (i.e. CWA) will allow airlines to reduce the amount of fuel carried for emergency diversion purposes. This saves approximately: • 110 million kilograms of fuel carried as deadweight annually, • Resulting in 20 million kilograms of fuel not burned, and • An estimated 60 million kilograms of CO₂ emissions avoided annually. These are credible, extrapolated figures based on a basket of aircraft types and route profiles modelled by aviation performance experts, not speculative claims. The use of terms like “people, planet and profit” reflects the well-established triple bottom line framework for sustainable development. It is a recognised framework for assessing socio-economic and environmental co-benefits. Furthermore, economic development and regional infrastructure improvements are legitimate considerations in Section 5, as required by the EIA Regulations and spatial planning frameworks. The DEIR remains objective, procedurally correct, and grounded in specialist input and strategic planning documents. There is no indication of bias or

			exaggeration—only a comprehensive explanation of the project's broader public value.
		36. The statements made in the amended DEIR in support of its purported "positive" impact are not backed by appropriate evidence or data. The claims remain largely unsubstantiated, with no credible research cited. The only specialist reports referenced focus narrowly on multi-airport city support, alternate destination requirements, and potential fuel savings.	EAP response: The statement included <i>create a positive impact on the environment by reducing the carbon footprint resulting from air travel into the region</i> is based on technical input from specialists (refer Appendix 15 to the amended draft EIR). Response from CWA: The statements in the amended DEIR regarding the positive impacts of the proposed CWA are not unsubstantiated—they are based on credible, specialist research and modelling aligned with both the scope of the project and international best practice for infrastructure planning. Key clarifications: • The Airports Planning Report, Alternate Airport Analysis, and Aeronautical Performance Modelling all support key findings, such as multi-airport system efficiency, fuel savings, and reduced carbon emissions. These are not anecdotal claims, but quantified outcomes derived from expert studies using representative aircraft and route baskets. • The modelling shows that by providing a closer alternate, CWA could save approximately 110 million kilograms of fuel carried, 20 million kilograms of fuel burned, and 60 million kilograms of CO₂ emissions annually—a tangible environmental benefit rooted in operational data, not speculation. • While the DEIR focuses on air quality, land use, and socio-economic dynamics, the specialist reports collectively provide a multi-dimensional justification for the project's need and desirability.

			These include regional spatial development frameworks, economic impact modelling, and infrastructure integration studies. In summary, the DEIR's positive claims are grounded in specialist evidence, quantifiable performance metrics, and planning alignment, all of which are available for public scrutiny.
		37. It is important to note that the majority of the pro-sustainability impacts are of economical nature. The EAP fails to identify justifiable examples of the other categories of sustainable development, such as the social and ecological goals this development will help achieve.	EAP response: Socio-economic impacts are assessed in the Socio-Economic IA, inclusive of applicable development strategies on a national and provincial and local government level and included in the amended draft EIAR. Ecological impacts are assessment through various specialist reports and evaluated against national, provincial and local government legislation, databases, conservation strategies. Resultant Terrestrial and Freshwater offsets are based on national legislation and policies and further conservation requirements for these identified ecological systems or vegetation types, thus in line with sustainable development. Response from CWA: This claim is incorrect. The DEIR clearly addresses all three pillars of sustainability: • Social: The project creates long-term jobs, improves regional access to air travel, and supports inclusive growth in underserved areas. • Environmental: It reduces CO₂ emissions by an estimated 60 million kg annually through reduced fuel burn, promotes compact land use, and includes buffers and biodiversity offset measures. • Economic: It drives regional investment and infrastructure readiness. The DEIR's sustainability case is broad-based and well-supported.

38. The CWA justifies their need and desirability by way of reference to the Fisantekraal Industrial area. The current layout of the Fisantekraal Industrial area portrayed by the amended DEIR "supports" their submissions that the proposed CWA expansion project is needed to increase the diversity of job offerings and to deduce spatial dislocation. The amended DEIR does not qualify this by way of alternative options, such as agricultural land use, and focuses solely on the pure economical, business-centred potential. This averment is confirmed by their submissions that this area will most likely become another informal settlement. In contradiction, it is clear from consulting Google Earth images that the industrial area is in very close proximity to the Fisantekraal community and that most units are occupied judging by the presence of vehicles, which clearly demonstrates the contrary.



EAP response:

The state and functionality of the Fisantekraal Industrial area should be ground truthed by the IAP and not viewed from a Google image. The amended draft EIAR does not need to include alternative land use options for land parcels outside of the application area (such as the Fisantekraal Industrial area) and rather portrays the true situation on site.

Response from CWA:

The claim that CWA justifies its need based on the Fisantekraal Industrial Area is incorrect. **CWA does not rely on that industrial area as the basis for its justification.** It is merely referenced in the DEIR as part of the **broader spatial context**—not as a primary motivation.

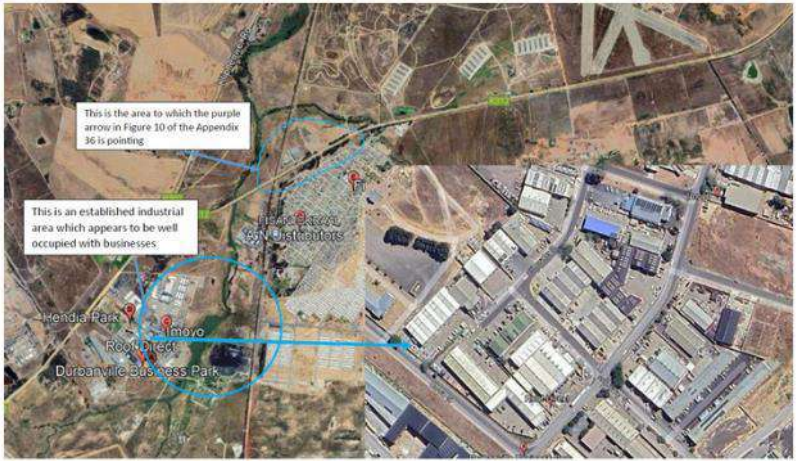
Key clarifications:

- The DEIR makes a **regional-scale case**, referencing national and provincial spatial development frameworks, air traffic demand, airport system capacity, and socio-economic transformation—not a small local industrial precinct.
- The reference to the industrial area is **contextual only**, showing the presence of existing infrastructure and its proximity to underserved communities—not a core argument.
- The suggestion that agricultural alternatives were not considered is false. The **MSDF and PSDF** both promote **mixed-use economic diversification** in this area and do not prescribe blanket protection of farmland within urban edges.

The CWA's need and desirability are underpinned by **aviation, economic, and spatial integration principles**—not the status of a single industrial node. The assertion is a misrepresentation.

Response from town planner:

Furthermore, employment density in industrial areas is significantly lower than in residential zones. This is evidenced by the size and scale of established

			industrial nodes such as Epping, Montague Gardens, and Blackheath, each of which requires large footprints to support relatively modest workforce numbers. While the emerging industrial development southwest of Greenville Phase 1 is a positive step, it represents only a fraction of the broader employment need in the region.
		39. The above figure (Figure 10) is shown in Appendix 36 of the amended DEIR and includes a photograph of the ruins of the Entrance to the Fisantekraal Industrial Park. 	EAP response: This comment has been responded to above Response from CWA: The photograph of the Fisantekraal Industrial Park ruins in Figure 10 is a visual context reference, not a justification for the airport's expansion. Its inclusion does not imply that the industrial park is central to the project's rationale. Key point: • CWA's need and desirability are not based on the state of the Fisantekraal Industrial Park, but on broader national and regional factors—airspace demand, infrastructure pressure at CTIA, economic development potential, and spatial justice objectives. • The photo merely illustrates one element of the surrounding land use—its presence does not elevate it to a determining factor in the decision-making process. The inclusion of Figure 10 does not compromise the DEIR's credibility or its strategic logic. To suggest otherwise is a misreading of its purpose. Response from town planner: Fig 10 and the comments made in Appendix 36 referred specifically to the area north of Lichtenberg road earmarked for Industrial development in the City's District Plan. Page 21 of Appendix 36 reads: <i>"The area directly west of the existing airport is designated for "industrial" use in Northern District Plan (See Fig. 10). The area stretches up to the railway line all the way north of Lichtenburg Road."</i> The text further explains that:

			<i>“commercial and industrial nodes do not develop because spatial plans and zonings permit such land use. It only happens where the cumulative agglomeration advantages and symbiotic business interdependencies make it possible.”;</i> <i>“Without a massive catalyst, the existing Fisantekraal Industrial area and the large extent between it and the airport, is unlikely to be developed as a thriving industrial employment node over the next 20 years. A more probable scenario is that it will become another informal settlement.”</i> <i>“The photograph in figure 10 above illustrates the challenge of converting the vision of making the area coloured up in purple on the map into a thriving employment node. At present the gateway to the industrial park sadly reflects unfulfilled employment expectations next to large monofunctional dormitory developments.”</i>
		40. The top area circled is the subject area in the figure above, whilst the below circle area demonstrates that the area is in fact developing and that economic and industrial activities are present. Figure 10 is a clear attempt to distort the truth and specifically chose a subject area which looks barren.	EAP response: this comment has been responded to above. Response from CWA: The suggestion that Figure 10 was selected to “distort the truth” is unfounded. The image simply shows one view near the Fisantekraal Industrial Park—not the entire area—and was included as contextual reference, not as a statement about the success or failure of the industrial zone. Key clarifications: • The DEIR does not rely on the condition of this industrial area—whether underdeveloped or active—as a justification for CWA. It is not presented as a central argument in the need and desirability section. • The presence of functioning business parks nearby, as shown in the bottom circle of the image, strengthens the case for strategic infrastructure like CWA, which will connect growing nodes and enhance accessibility.

			Visual references in EIAs often illustrate portions of a site or surrounding land. To infer intent to mislead from one photo is speculative and unsupported. CWA's justification stands on national infrastructure, airspace capacity, and regional development planning. The comment distracts from the actual strategic rationale. Response from town planner: The area north of Lichtenburg Road, which is the subject for the comment made, remains largely underdeveloped and this I&AP's response does not engage with this fact or acknowledge the potential of the CWA to serve as an economic catalyst for the area.
		41. A critical component of the application of the need and desirability principle is that the rationale or reasoning for the proposed development is based on whether it does or does not meet particular sustainability criteria. Need and desirability studies should thus analyse if the proposed development is both ecologically sustainable and socio-economically justifiable.	EAP response: The Need and Desirability of the proposed project is assessed in Section 5 of the amended draft EIAR. Section 5 includes background information on the proposed project in way of introduction (section 5.1 Development context). Section 5.2 elaborates on the need – how this proposed project relates to the interests of the broader public (which includes passengers, the aviation sector, larger adjacent communities and not just adjacent landowners), and desirability – Geographical placement of this proposed expansion at the existing CWA in terms of land use, transport (air and land) and acting as a second airport in CoCT and a reliever to CTIA amongst others. Where needed the information is backed up by technical studies. The additional motivations included in Section 5.2 resulted from inputs from the aviation stakeholder sector and is included to provide a broader view on the need and desirability of the proposed project. Further to this as stated in Section 5.2.7, Appendix 36 CWA in the Context of Spatial Policy and Land Use Rights Section 6 assesses the proposed project against the 2013 DEA&DP Guideline on Need and Desirability, specifically those questions related to a strategic spatial planning perspective.

			The Socio-Economic Impact Assessment (Appendix 23) reiterates that the need and desirability of the proposed project was successfully illustrated through the analysis of the DEA&DP Guideline and shows contribution to economic growth, maintaining a competitive advantage by having a diversified aviation infrastructure to cater to multiple aviation needs, alleviating capacity constraints at major hubs, and illustrating that the proposed development of CWA is more time-efficient and cost-effective than building a new airport. CWA's location, ability to avoid urban constraints or have an undue negative impact on large residential communities, accessibility from major roads (N1) and railway, and reducing road congestion around the two airports adds to its desirability. The positioning and expansion of the CWA in Cape Town, recognised as a national urban node, aligns with the CoCT's competitive growth potential, and meets national, regional, and the CoCT's spatial and economic needs in terms of National Spatial Development Framework (NSDF) 2050 Outcomes, The PSDF 2014 Policies, Greater Cape Metro Regional Spatial Implementation Framework (GCM RSIF) 2019 Policies, Western Cape Growth for Jobs Strategy 2023 and Priority Focus Areas (PFA), The CoCT MSDF 2023 Policy Intent, The 2022-2027 CoCT IDP Priorities, IDP MSDF Priorities. Part of the development extends over the UDE, mostly the airside components (runway safety area). Part of the development site that is outside of the UDE includes land of 'Agricultural Significance' indicated in the MSDF. The eastern portion of the development site, which lies within the UDE, is identified as Core Biodiversity Area (refer Figure 19 in the amended draft EIAR). Refer to page 123 in the amended draft EIAR where agricultural significance, aquifer vulnerability and CBA mapping has been dealt with. This also links with the requirement for ecological sustainability and indication of the project in relation to legislation, policies, plans and strategies. The site-specific circumstances justifying deviations to accommodate CWAs expansion forms part of the land-use application as is required in terms of section 9 of the MPBL. Similarly, the LUPA application is being prepared.

			No amendment to the MSDF is required in terms of section 6 (b) of the Municipal Planning By-law, subject to CoCT considering that the site-specific circumstances justify a deviation from the MSDF for those parts of the proposed development that are not consistent with the MSDF. Further to this sustainability and climate change is addressed in Section 5.3. Response from CWA: The DEIR fully applies the “need and desirability” principle as intended—evaluating whether the proposed CWA is ecologically sustainable and socio-economically justifiable. Key points: • Ecological sustainability is demonstrated through compliance with all relevant thresholds, including air quality (NAAQS), biodiversity offsets, noise mitigation, and land use compatibility. • Socio-economic justification is strongly supported by independent specialist reports, highlighting job creation, connectivity, spatial transformation, and infrastructure resilience. • The DEIR applies the criteria outlined in the EIA Regulations and national policy. The claim that it fails to do so is incorrect and ignores the breadth of content in Section 5 and accompanying specialist inputs. The assessment is balanced and consistent with the legal and policy framework.
		42. The justification of the proposed development in terms of social costs to the surrounding community is not adequately assessed and addressed in the amended DEIR. The interest and needs of the broader public is not taken into consideration as the adverse impacts of noise disturbance and disruption of its sense of space is not comprehensively addressed. The EAP solely focuses on the economical "desire" of the proposed CWA expansion project and completely ignores the social impact.	EAP response: The social and economic impacts of the proposed project are assessed in the Socio-Economic Impact Assessment (Appendix 23 to the amended draft EIAR). The report assesses impacts on the local economy and communities (both positive and negative), including the effect on sense of place as it relates to local communities.

			Social impacts are included in the amended draft EIAR. Response from CWA: The claim that the DEIR ignores social impacts is incorrect. • Noise and sense of place impacts are explicitly assessed in the Noise Impact Assessment (NIA), with receptor locations including Greenville, Bella Riva, Klipheuwel, and Fisantekraal. Findings show compliance with SANS 10103 and the Western Cape Noise Control Regulations. • The DEIR also includes a Socio-Economic Impact Assessment, which considers employment, access to opportunity, and transformation of historically under-served communities—clear social benefits aligned with the public interest. • The project is assessed not on “desire” but on need, sustainability, and spatial justice. The DEIR does not sideline social costs—it addresses them directly and finds them manageable and outweighed by long-term social and economic benefits.
		43. There is an inadequate application of the City of Cape Town's Municipal Spatial Development Framework (MSDF) in terms of the following deficiencies:	Response from CWA: The DEIR applies the MSDF appropriately and in line with its intent. • It identifies CWA as aligning with the MSDF's goals of regional accessibility, economic diversification, and integrated infrastructure development. • The MSDF is applied at a strategic level, and the DEIR correctly references relevant policy statements, spatial transformation objectives, and economic growth nodes. • The EAP does not apply the MSDF selectively—it reflects the City's own planning priorities, including the need for complementary infrastructure that alleviates pressure on CTIA.

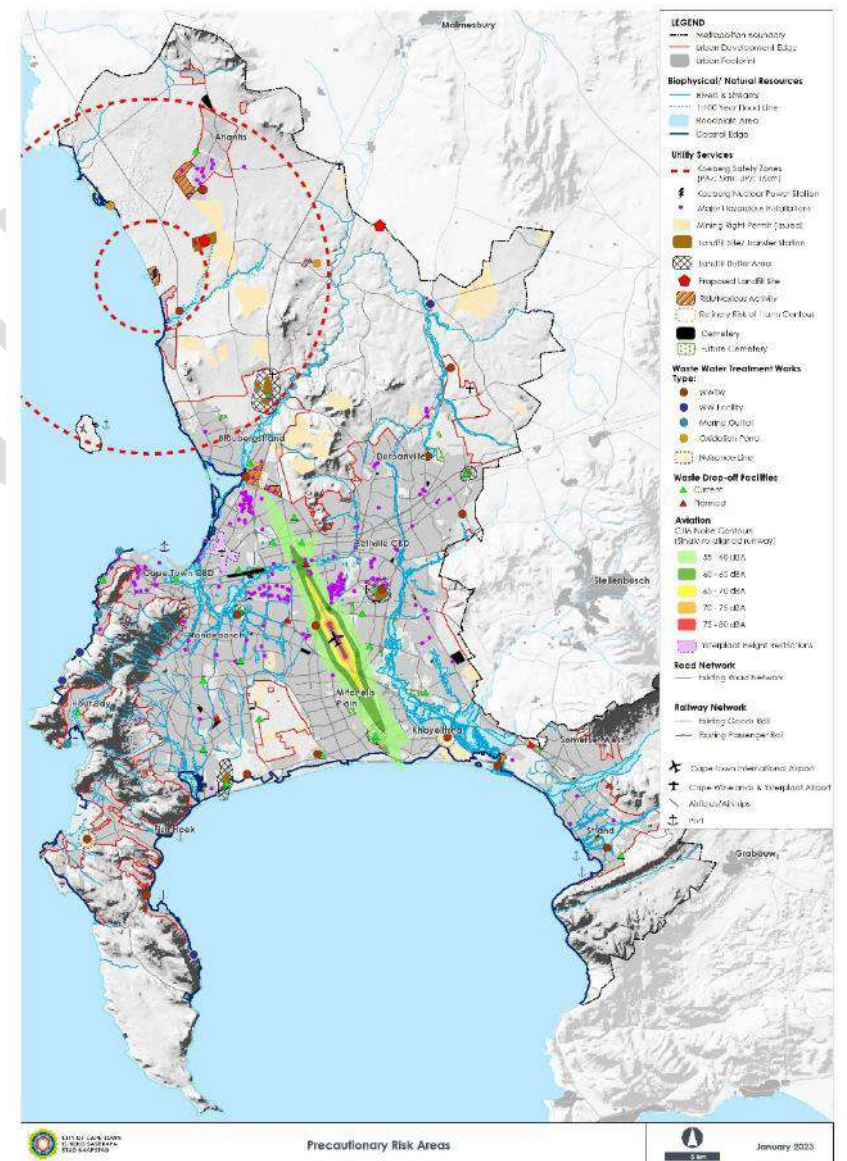
			There is no deficiency—MSDF principles are applied comprehensively and consistently within the scope of the EIA.
		43.1. Map 5a of the MSDF demonstrates that residential and community use should not be located within the 65 dB(A) noise contour area. The predicted impact of noise on the surrounding community is in direct contradiction of municipal frameworks which are specifically prescribed for need and desirability assessments.	Response from CWA: Map 5a of the City of Cape Town’s MSDF is guidance, not a statutory exclusion zone, and applies primarily to new land use proposals—not to lawful existing developments like CWA. Key points: • The DEIR and Noise Impact Assessment (NIA) fully acknowledge the 65 dB(A) contour, and predicted noise impacts have been modelled accordingly. • No existing residential dwellings fall within the 65 dB(A) contour, and future developments, including unbuilt portions of Greenville, will require new environmental approvals, allowing noise compatibility to be assessed at that time. • The MSDF does not prohibit development in these zones—it encourages sensitive planning, which CWA supports through buffer zones, phased implementation, and adaptive mitigation. There is no contradiction with the MSDF. The DEIR applies it correctly, ensuring both need and desirability are evaluated within the spatial and regulatory context. Response from town planner: The purpose of including Figures 6 and 8 in Appendix 36 as extracts from the relevant maps in the MSDF and the Northern District Plan is to draw the attention of the relevant competent authorities (DEADP to NEMA and CoCT to the MPBL) that the areas directly to the south and the west of the CWA site are indicted as “<i>Incremental Growth and Development Area</i>” in the MSDF and as “<i>New Development Area</i>” in the Northern District Plan.

			This is in accordance with both the <i>National and Provincial Guidelines on Need and Desirability (March 2013)</i>. These guidelines require that the strategic context of such applications be set out (which was done) so that the broader societal needs and the public interest can be considered. The guidelines further make it clear that whether a proposed activity will be in line with or deviation 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. No existing residential area, nor any land zoned for residential, falls within the 65 dB(A) noise contours area. All the land (except CWA's land with Airport rights) impacted upon by the 65 dB(A) noise contour is zoned "Agricultural". In this context, it is important to point out that s.9 and s.16 of the MPBL specifically records that the MSDF and District Plans do not grant rights or take rights away. To develop these properties would require an EIA and rezoning application, during which the most appropriate use and mitigation measures can be determined. This could include a Mixed-Use Zone as a buffer with higher noise tolerances.
		43.2. Policy 16 of the MSDF calls for directing urban growth away from risk areas and activities. P16.1 explicitly discourages inappropriate land development in zones associated with major hazards, including those linked to fuel storage and similar risks. Despite this, the proposed CWA expansion project would introduce a Major Hazard Installation due to the inclusion of fuel storage facilities—even if classified as Low Hazard under current legislation—thereby directly conflicting with the intent of the policy.	Response from CWA: Policy 16 of the MSDF aims to guide development away from high-risk zones, not to prohibit necessary infrastructure that complies with safety regulations. Key points: • The proposed CWA fuel storage is being designed in line with Major Hazard Installation (MHI) Regulations, and its classification as Low Hazard means it does not trigger exclusion under Policy 16. • The MSDF allows for strategic infrastructure where risks are mitigated and land use compatibility is demonstrated—as is the case here, with buffer zones and risk-informed site planning. • Airports by nature require fuel storage. Applying Policy 16 to exclude such infrastructure would effectively prohibit airport development entirely, which is clearly not the MSDF's intent.

			There is no policy conflict—the project aligns with Policy 16 by minimising risk through compliance and planning controls. Response from town planner: MSDF Policy 16 notes that Risk areas are either already determined through proclamations / law or specialist studies, or will be determined as part of the EIA processes or pre-submission consultation processes and include both man-made and natural risks Policy 16.1 refers to other development being located close to certain risk areas. It does not refer to fuel installations specifically. The exact wording is: P16.1 Discourage inappropriate land development in mining blasting zones, servitudes, heavy or noxious industrial zones, major hazardous installations, solid waste disposal and wastewater treatment and transfer sites, cemeteries or areas subject to regular flooding or flood risk, sea level rise risk areas or related buffer areas. The CWA, being on the Urban Edge, is well positioned to direct inappropriate development away from its areas of higher risk. P16.2 Pre-application consultations are mandatory for all urban development proposals between 55dBA – 80dBA noise contours (current and proposed). Runways must be within the framework of restrictions in terms of SANS 10103: 2008 as well as any applicable height restrictions. P16.3 Ensure development applications adhere to risk mitigation measures and maximum design efficiency in accordance with SANS10103 and the National Building Regulations Act. P16.4 Decision-making and conditions of approval related to risk, or its mitigation must comply with regulations in terms of the Occupational Health and Safety Act or other applicable legislation or council-approved policies. P16.6 Land development at, or close to, an airport or airfield that is incompatible with any existing or potential future aviation rights will not be supported (Table 8 - Development Directives). P16.9 Support the CTIA to continue providing the national and international aviation function to a limit that is determined by its manageable impact on

			surrounding land uses (noise impacts). The City, ACSA and other aviation / airport operators to consistently engage for long-term noise monitoring and mitigation measures with the objective to reduce health risks related to an inner-city airport. P16.11 Investigate the suitability of the current medium-term, and planned long-term, accommodation of the general aviation function of the airports / airfields and consider noise impacts even in the absence of declared noise contours. P16.12 Continued engagement between the City and ACSA (especially in the review of the CTIA Master Plan) to ensure that the envisioned future role of CTIA is flexible enough to cater for the City's vision to upgrade informal settlements and construct infill housing on land near the airport, as well as other economic and social development projects. P16.13 Support complimentary and appropriate land development at the Cape Winelands Airport that will contribute to the efficiency of CTIA in terms of general aviation and related uses.

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		43.3. The proposed CWA does however utilise P16.13 of the MSDF in Section 5.2 and states that this implementation "support complementary and appropriate land development at the Cape Winelands Airport that will contribute to the efficiency of the CTIA in terms of general aviation and related issues". This is used to justify the need for two airports and a multi-airport city. However, other MSDF provisions that caution against development in risk areas are ignored. This selective approach fails to meet the requirements of a proper need and desirability assessment, which must consider both alignment with and conflict against relevant policies.	Response from CWA: The DEIR does not selectively apply the MSDF. It references Policy P16.13 correctly to demonstrate spatial alignment with the City's support for complementary, aviation-related development at Cape Winelands Airport. Key points: • The DEIR does not ignore MSDF risk-related provisions—it addresses potential risks (e.g. noise, fuel storage) through specialist studies, buffer zones, and regulatory compliance, including risk classification under Major Hazard Installation regulations. • The MSDF does not prohibit infrastructure in proximity to sensitive uses—it calls for appropriate mitigation and planning, both of which the DEIR demonstrates. • The DEIR provides a balanced need and desirability assessment, acknowledging potential risks while clearly showing policy alignment, strategic integration, and regional benefit. The DEIR engages with both supporting and cautionary MSDF provisions and addresses them through concrete mitigation and planning mechanisms. Response from town planner: This I&AP is misinterpreting Policy 16 based on the wrong reading of Policy Statement 16.1, which describes certain areas from which "inappropriate development" should be directed away for. These areas are "mining blasting zones, servitudes, heavy or noxious industrial zones, major hazardous installations, solid waste disposal and wastewater treatment and transfer sites, cemeteries or areas subject to regular flooding or flood risk, sea level rise risk areas or related buffer areas." Should CWA be deemed to be a risk area, then "inappropriate development" should be directed away from it in future. There is nothing contradictory, nor selective, about these policy statements.

		43.4. The need and desirability aspect of a proposed development are partly based on the notion that it will materially contribute to the integrated development plan priority wherein the project will assist the City to "drive spatial integration through the investment in public transport" through the investment of "public transport and the release of City-owned land". This statement in the Integrated Development Plan (IDP) is neither here nor there. The proposed CWA expansion project does not contribute to public transport, nor land appropriation.	Response from CWA: The assertion is misleading. While the Cape Winelands Airport (CWA) is not a public transport project per se, it supports spatial integration and access, consistent with the intent of the Integrated Development Plan (IDP). Key points: • CWA enhances regional mobility and connectivity, particularly for underserved communities in the Cape Winelands, and reduces reliance on Cape Town's single airport node. • The airport's location is deliberately aligned with areas targeted for transit-oriented development and job accessibility, complementing broader spatial restructuring goals. • While it may not directly invest in City-owned land or bus infrastructure, it stimulates transport-linked investment, including private shuttles, regional road upgrades, and potential integration with future public transit extensions. The DEIR makes no claim that CWA is a public transport hub—it shows that the project is consistent with the IDP's spatial and infrastructure investment strategy, which is accurate. The criticism mischaracterises the DEIR's position. Response from town planner: In terms of local government legislation, the IDP is primarily a strategic instrument that guides the City's medium-term budgeting and resource allocation. As such, it focuses on levers directly under the City's control, such as aspects of public transport and municipal land. Strategically, the emphasis is on outcomes rather than inputs. Economic growth is a top-tier priority in the IDP, while transport—broadly including inter-city mobility—is identified as a second-tier priority. Although airport-related projects fall within the City's area of influence rather than its direct control, the proposed expansion will still meaningfully support several key objectives outlined in the IDP, such as: ECONOMIC GROWTH OBJ 1:

			Increased jobs and investment in the Cape Town economy TRANSPORT OBJ 12: A sustainable transport system that is integrated, efficient and provides safe and affordable travel options for all, and OBJ 15: A MORE SPATIALLY INTEGRATED AND INCLUSIVE CITY.						
	44. The Department's Guideline on need and desirability explicitly warns against environmental impact assessment reports focusing on information primarily concerned with "business care", yet the writer of section 5.2 of the Amended DEIAR seems to directly copy information in the MSDF from the CWA's "The Value Proposition" accessible in CWA's presentation included in Appendix 3 of Appendix 40 to the amended DEIR from their website. The following statements are copy and-paste phrases from these different sources:		EAP response: The amended draft EIAR is based on the inputs from industry specialists and technical advisers that has been pulled through into the CWA presentation, as referred to in Appendix 40. The presentation is used for stakeholder engagement and recorded as such in an open and transparent manner. Business care is a main concern of stakeholders and one of the items addressed during presentations.						
	<table><tr><th>Promotional phrases from CWA</th><th>Draft EIAR</th></tr><tr><td>"needed during peak times"</td><td>"alleviate pressure in existing peak times"¹⁴⁶</td></tr><tr><td>"a convenient option for air travel for residents of the north and eastern parts of the region"</td><td>"The positioning of the proposed CWA – along the N1 corridor – is very desirable such that it will be a far more convenient option for hundreds of thousands of travellers who live to the North and northeast of the city."¹⁴⁷</td></tr></table>	Promotional phrases from CWA	Draft EIAR	"needed during peak times "	"alleviate pressure in existing peak times " ¹⁴⁶	"a convenient option for air travel for residents of the north and eastern parts of the region"	"The positioning of the proposed CWA – along the N1 corridor – is very desirable such that it will be a far more convenient option for hundreds of thousands of travellers who live to the North and northeast of the city." ¹⁴⁷		Response from CWA: The claim that Section 5.2 of the DEIR “copies promotional material” is misplaced. The overlap in wording stems from the use of standardised language found in planning, economic, and infrastructure development discourse . The examples shown (e.g. "peak times", "convenient option", "vehicle carbon emissions", "economic growth", "catalytic infrastructure") are common and neutral planning terms , frequently used across policy documents, transport master plans, and spatial frameworks , including the City’s MSDF and IDP .
Promotional phrases from CWA	Draft EIAR								
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"a convenient option for air travel for residents of the north and eastern parts of the region"	"The positioning of the proposed CWA – along the N1 corridor – is very desirable such that it will be a far more convenient option for hundreds of thousands of travellers who live to the North and northeast of the city." ¹⁴⁷								
	<table><tr><td>"Because of the savings in fuel consumption that Cape Winelands Airport will enable, carbon emissions will also decrease, benefiting the entire airline industry."</td><td>"This improves air access and reduces travel times, traffic, cost as well as vehicle carbon emissions"¹⁴⁸</td></tr><tr><td>"Cape Winelands Airport will serve as a catalyst for economic growth in the region"</td><td>"General aviation airports contribute significantly to the local economy."¹⁴⁹</td></tr><tr><td>"catalysing multi-modal commercial activity in the region and stimulating economic growth"</td><td>"a catalytic infrastructure project designed to drive regional economical growth"¹⁵⁰</td></tr></table>	"Because of the savings in fuel consumption that Cape Winelands Airport will enable, carbon emissions will also decrease , benefiting the entire airline industry."	"This improves air access and reduces travel times, traffic, cost as well as vehicle carbon emissions " ¹⁴⁸	"Cape Winelands Airport will serve as a catalyst for economic growth in the region "	"General aviation airports contribute significantly to the local economy ." ¹⁴⁹	" catalysing multi-modal commercial activity in the region and stimulating economic growth "	"a catalytic infrastructure project designed to drive regional economical growth " ¹⁵⁰		Key points: - These phrases are derived from objective policy alignment and are used to translate complex specialist findings into accessible language for decision-makers. - References to regional economic growth, emissions reduction, and travel efficiency are based on specialist reports, including
"Because of the savings in fuel consumption that Cape Winelands Airport will enable, carbon emissions will also decrease , benefiting the entire airline industry."	"This improves air access and reduces travel times, traffic, cost as well as vehicle carbon emissions " ¹⁴⁸								
"Cape Winelands Airport will serve as a catalyst for economic growth in the region "	"General aviation airports contribute significantly to the local economy ." ¹⁴⁹								
" catalysing multi-modal commercial activity in the region and stimulating economic growth "	"a catalytic infrastructure project designed to drive regional economical growth " ¹⁵⁰								

			aeronautical performance modelling, fuel savings data, and strategic airport network planning. The DEIR clearly attributes statements to supporting evidence (e.g. footnotes 46–50), ensuring transparency. The phrasing reflects the shared policy and technical vocabulary of infrastructure development. The DEIR’s conclusions remain grounded in independent analysis and verified specialist inputs.
		45. This clearly demonstrates a misconception of the purpose of the need and desirability component in the EIA process.	EAP response: this comment has been addressed above. Response from CWA: There is no misconception. The DEIR’s need and desirability section follows the purpose outlined in the EIA Regulations—to assess whether the project aligns with broader spatial, environmental, and socio-economic policy objectives. It references strategic plans, specialist inputs, and sustainability metrics. The section does not serve to promote a project, but to demonstrate its fit within long-term public planning priorities. To suggest otherwise misrepresents both the content and intent of the assessment.
		46. Furthermore, the following comments are worth mentioning regarding the below statements:	-
		46.1. "CWA’s complementary role to CTIA on route viability and air access" - the assertion that CWA will make previously unviable routes viable is presented without any supporting evidence. While it is suggested that this could allow CTIA to target new routes and grow its market share, no specific examples of such routes are provided. There is no reference to research, feasibility studies, or data to support the claim, so the benefit remains purely speculative.	EAP response: The statement is based on the opinion of specialists and technical advisers to the CWA team, with technical and specialist studies provided as attached to the amended draft EIAR. Response from CWA:

			The claim that CWA’s complementary role is speculative ignores the specialist airport planning inputs submitted as part of the DEIR. The assertion that CWA can support previously unviable routes is based on well-established aviation network principles. Key points: • The Multi-Airport System report and Air Service Benchmarking studies demonstrate that secondary airports often enable low-cost carriers, charter operators, and regional routes that cannot compete for slots or pricing at major hubs like CTIA. • The principle that diversifying airport infrastructure expands route flexibility, opens access to underserved regions, and alleviates congestion for major carriers is a globally proven pattern and is explicitly supported in South Africa’s Aviation Policy and MSDF. The benefit is well-founded and supported by international precedent and specialist input, even if final routes are commercially determined post-approval.
		46.2. "Up to 56 million kg reduction in CO2 emissions per annum" - the parameters and assumptions used to determine fuel savings for the proposed project are not clearly outlined. As a result, it is unclear how the calculations were conducted. What variables were considered? Were industry-accepted methodologies applied? The report did not directly include a summary or projection of the cumulative CO2 reductions, i.e. the carbon emissions from CWA's own emissions generated by the airport and flying facilities.	EAP response: The estimated figure quoted is based on a study that was conducted by a specialist company in the field (PACE Aerospace Engineering & IT GmbH), as attached to the amended draft EIAR as Appendix 15. Response from CWA: The estimated 56 million kg reduction in CO₂ emissions per annum is accurate and supported by the <i>PACE Diversion Airport Analysis</i> (2022), a specialist report submitted with the DEIR. This saving is not speculative—it is based on real operational data from 2019, using a representative mix of international flights into Cape Town International Airport (CTIA). The analysis models a change in flight planning logic: if Cape Winelands Airport (CWA) were available as a closer alternate,

			airlines could reduce the amount of emergency fuel uplift they are currently required to carry. Key facts from the report: • The fuel weight savings from reduced alternate distances total approximately 110 million kg per year. • This results in an estimated 20 million kg of fuel actually burned, translating into a 56 million kg reduction in CO₂ emissions annually. • The model assumes all aircraft still land at CTIA as their primary destination—the benefit comes purely from planning efficiencies, not diverting traffic. This calculation follows industry-accepted aeronautical performance modelling and reflects a credible, system-level emissions saving, not promotional guesswork. It directly supports the argument that CWA plays a meaningful role in regional airspace sustainability, even without displacing primary traffic from CTIA.
		46.3. “The positioning and expansion of the CWA in Cape Town, recognised as a national urban node, aligns with the Greater Cape Metro’s competitive growth potential, and meets national, regional, and the CoCT’s spatial and economic needs” - This vague and non-specific statement could apply to virtually any major investment project. In essence, it’s a hollow, promotional remark that reveals a clear bias in favour of the proposed CWA expansion, rather than offering an objective, evidence-based assessment.	EAP response: The statement is further clarified in subsequent sections of the amended draft EIAR and should not be read in isolation by the IAP. Refer to sections below this statement on page 159 of the amended draft EIAR for clarification. Response from CWA: This statement is neither vague nor promotional—it reflects the findings of the DEIR’s policy alignment analysis, which references specific national, provincial, and municipal frameworks. Key points: • The Cape Winelands Airport (CWA) is located within the Greater Cape Metro Functional Region, as defined in the Western Cape’s PSDF and supported in the City of Cape Town’s MSDF. Both explicitly call for

			infrastructure-led economic growth, spatial integration, and aviation expansion. • The DEIR cites the project's consistency with frameworks such as the National Development Plan, the Integrated Urban Development Framework, and the Western Cape Growth Strategy—demonstrating clear alignment with spatial and economic policy. • The statement summarises this alignment and is backed by references throughout Section 5 and specialist inputs. It is not promotional; it's a concise policy conclusion drawn from the record. Far from hollow, the statement reflects a consolidated outcome of policy review and demonstrates that CWA fits within government-identified growth and infrastructure priorities. Response from town planner: The evidence is in App-23-CWA-Socio-Economic-Impact-Assessment. The proposition that this may apply to any major investment project does not detract from the benefit. There are a limited number of major investment projects of this scale and whether some of these limited opportunities may seem generic, this does not distract from the multiplier effect on the regional economy. To the contrary, it underscores the value of major investment projects.
		47. The amended DEIR defends the project's need and desirability though the application of sustainable development, with specific reference to the United Nations Sustainable Development Goals (SSG). The claims that the proposed CWA project will contribute to the SDG's are overstated:	EAP response: The comment is noted. Please note that the proposed project will contribute to SDG's. The DEA&DP Guideline does not require SDG analysis, yet the amended draft EIAR has included this additional information, which adds to the evaluation of sustainability of a proposed project. Note SDG9 was not previously identified as an area of contribution, but should also be considered. Response from CWA:

			The DEIR's reference to the United Nations Sustainable Development Goals (SDGs) is both appropriate and justified. • The project directly supports SDG 8 (Decent Work and Economic Growth) through infrastructure-led job creation and regional investment. • It contributes to SDG 9 (Industry, Innovation and Infrastructure) by expanding critical aviation infrastructure in an under-served region. • SDG 13 (Climate Action) is addressed through measurable system-wide CO₂ savings, as modelled in the Diversion Airport Analysis report. These links are practical, not overstated. The DEIR demonstrates how the project supports SDG-aligned outcomes in a realistic and evidence-based way.
		47.1. End poverty in all its forms everywhere – despite constant promotion of the development's positive economic impact, it is unlikely that the proposed CWA will offer meaningful relief to poverty as many employment opportunities will require skilled persons with experience in the aeronautical industry.	EAP response: Note no claim was made in the amended draft EIAR <i>End poverty in all its forms everywhere</i>. The amended draft EIAR states on page 177 - <i>SDG 1, 2, 3 & 4 (Reduction in poverty, hunger and increase in health, well-being and education) – the project aims to create jobs for breadwinners, resulting in the ability for households to have nutritional food on the table and for the youth to be educated.</i> The possible employment opportunities generated by the proposed CWA includes skilled and unskilled. The Socio-economic IA highlights the resultant sustainable employment, which will enable reduction in poverty and hunger, and result in increased health, well being and education. Response from CWA: The claim dismisses the broader economic and spatial upliftment potential of the project.

			- While not all jobs will be high-skilled, the CWA will create a mix of employment opportunities, including construction, security, logistics, maintenance, hospitality, and support services—many of which are accessible to low- and semi-skilled workers. - The project’s location near historically marginalised communities like Fisantekraal enhances spatial equity and access to opportunity—core tenets of SDG 1. - Infrastructure-led development is a proven driver of poverty reduction through indirect job creation, small business support, and economic stimulation. CWA contributes meaningfully to poverty alleviation—not in isolation, but as part of a broader regional development strategy.
		47.2. Ensure access to affordable, reliable, sustainable and modern energy for all - the proposed CWA expansion project purports their contribution as aiming to produce their own renewable energy, however this goal is widespread, and the application is incorrect. The installation of renewable energy is for their own use and has nothing to do with equitable access to affordable energy.	EAP response: The amended draft EIAR states - <i>SDG 7 (Affordable and clean energy) – the proposed project aims to produce its own renewable energy through solar PV and a biodigester. These forms of energy do not result in emissions or waste products and compare favourably in terms of cost with Eskom supply.</i> Less reliance on Eskom supply translates to more available supply to the local grid. At this point CWA is not including the feedback into the grid or a link to CoCT supply for future supply of surplus energy. Response from CWA: The DEIR does not claim that CWA will directly deliver public energy access. Rather, it supports SDG 7 through its commitment to on-site renewable generation, reducing reliance on fossil fuels and grid demand. Generating clean energy for operational needs aligns with the “sustainable and modern energy” component of SDG 7.

			- While not intended for public supply, the move toward self-sufficiency in energy demonstrates responsible energy practice, easing pressure on public infrastructure. - The DEIR makes no misleading claims about universal energy access—it correctly frames renewable energy as part of the project’s sustainability performance. The comment misrepresents the claim. The project’s clean energy strategy is accurate, relevant, and consistent with SDG 7 principles.
		47.3. Ensure sustainable consumption and production patterns – the amended DEIR claims that the proposed CWA expansion project will devote itself to sustainable practices, allowing the CWA to reduce its environmental impact. Contribution to this goal is improbable as the proposed project is providing a travel service that consumes fossil fuels. The nett reduction cannot be marginally compared to the nett gain of carbon emissions. Providing travel services that consumes fossil fuels cannot contribute to a goal of sustainable consumption. CWA's contributions to reducing their aviation fuel consumption are overrated and understated. For example, the PACE report, on which the statement of carbon emission reduction is based on, does not include the fuel saving results from the Airbus A350 which saves 7.8 tonnes of fuel should CWA be used as an alternate destination. If this data was not recorded in the PACE report, then where did this figure come from?	EAP response: The amended draft states - <i>SDG 12 (Responsible Consumption and Production)</i> - <i>The proposed project emphasises sustainable practices and reduction in the amount of reserve fuel, and promotes responsible consumption and production, allowing the airport to reduce its environmental impact as well as support the reduction in global aviation fuel consumption.</i> The IAP incorrectly uses <u>sustainable consumption</u> vs the text in the EAIR <u>responsible consumption</u>. There is no claim to sustainable fossil fuel usage – the CWA commits to being responsible, which means reducing unnecessary usage wherever possible, be it through route design, acting as an alternate airport to CTIA or other measures. The PACE report underlines this concept. Response from CWA: The comment conflates the existence of fossil fuel use with an inability to contribute to sustainable practices—this is incorrect and misrepresents the DEIR. SDG 12 is about reducing environmental impact through efficiency, innovation, and responsible management—not eliminating all fossil fuel use.

			• The DEIR shows that CWA will implement on-site renewable energy, sustainable infrastructure design, and operational efficiencies that lower its overall footprint. • Aviation fuel savings are not overstated. The PACE Diversion Airport Analysis quantifies system-wide carbon reductions based on actual 2019 flight data. While the Airbus A350 is not isolated in the summary, it is part of the broader route and fleet modelling used to derive the 110 million kg fuel saved / 56 million kg CO₂ reduction. The DEIR does not deny aviation’s impact—it shows that CWA improves the efficiency of the system, making it a contributor to SDG 12, not a contradiction of it. The carbon savings are evidence-based and conservative.
		48. In summary: 48.1. The amended DEIR places significant emphasis on the potential economic and employment benefits of the proposed CWA, often using overly promotional language. In doing so, it selectively references only the supportive policies and strategies, while ignoring information that may present a less favourable view of the development’s actual impact.	EAP response: this comment has been addressed. Response from CWA: The DEIR presents the economic and employment benefits of CWA based on specialist input and alignment with national, provincial, and municipal policies—not promotional spin. • Language reflects policy-aligned development principles, not exaggeration. Terms like “catalytic infrastructure” or “inclusive growth” are drawn directly from planning frameworks. • The DEIR does not ignore opposing views—it addresses risks (noise, air quality, biodiversity) through specialist studies, mitigation strategies, and regulatory compliance. • Referencing supportive policies is not selective—it’s required under the EIA Regulations for assessing need and desirability. The economic case is credible, balanced, and aligned with policy.

		48.2. Many of the benefits claimed in the amended DEIR are not supported by adequate evidence or research. The report uses exaggerated descriptions and unverified claims to justify the need for the project, while visual representations of the surrounding area appear to be deliberately chosen to create a misleading impression of underdevelopment.	EAP response: this comment has been addressed. Response from CWA: This claim is unfounded. The DEIR supports its conclusions with specialist reports, planning policy alignment, and independently modelled data. • Economic, social, and environmental benefits are based on credible inputs—including airport planning studies, socio-economic impact assessments, and aeronautical modelling (e.g. PACE report). • Visual material is used for contextual illustration only and does not form the basis of impact conclusions. Suggesting images were deliberately chosen to mislead is speculative and baseless. • Descriptions in the DEIR are drawn from planning terminology and verified data, not unverified claims. The benefits are well-supported, and the presentation is accurate. The accusation of exaggeration lacks substance.
		48.3. Social and environmental impacts are largely overlooked in the amended DEIR. Key issues such as noise pollution and the development's alignment with municipal planning frameworks are either downplayed or ignored. The broader public interest and long-term sustainability are not adequately assessed, with the focus resting heavily on economic gain.	EAP response: this comment has been addressed. Response from CWA: This is incorrect. The amended DEIR includes dedicated specialist studies on noise, air quality, biodiversity, and socio-economic impacts. • Noise pollution is assessed in detail in the Noise Impact Assessment, with modelling across all phases and receptor points including Greenville and Bella Riva. It applies SANS 10103 and accounts for cumulative exposure. • Municipal planning frameworks (MSDF, IDP, PSDF) are extensively referenced, with clear links to spatial transformation and infrastructure goals.

			The broader public interest and long-term sustainability are addressed through spatial integration, job creation, emissions reduction, and inclusive development. The DEIR does not ignore impacts—it evaluates them comprehensively and applies mitigation where needed. The focus on economics does not come at the expense of sustainability. Response from town planner: See response to 43.1, 43.2 and 43.3
	48.4. Lastly, the amended DEIR lacks independence, echoing promotional language found in CWA’s own materials. Many of the claims around environmental and social contributions are speculative and unsupported by proper data or methodology, calling into question the objectivity and credibility of the assessment.		EAP response: this comment has been addressed. Response from CWA: The DEIR is prepared by a legally appointed, independent Environmental Assessment Practitioner (EAP), in line with the EIA Regulations. - Claims around environmental and social benefits are based on specialist studies, not speculation—e.g. emissions reduction modelling (PACE), noise impact modelling, and socio-economic assessments. - Language overlaps with CWA’s material because both refer to the same publicly available planning frameworks, such as the MSDF, NDP, and PSDF. - Methodologies are clearly outlined, and all findings are supported by referenced data and expert input. The DEIR meets all regulatory requirements for independence, objectivity, and evidence-based assessment. Assertions to the contrary are unfounded.
	49. Attached hereto is a copy of the external specialist review by MEGA (May 2025) as Annexure A that comments on the amended DEIR specifically with focus on need and desirability, alternatives, and impact assessment approaches. The content thereof should be regarded as an extension of these comments and must be dealt with and responded to by the EAP and relevant specialist as		EAP response: The EAP has responded separately under Annexure A as appropriate. Duplication of comments has been pointed out.

		comments on the amended DEIR in their own right. The EAP is requested to make these comments and the external specialist review by MEGA (May 2025) available to the competent authority and to include complete copies thereof (together with the EAP / specialist responses thereto) as part of any future reporting in connection with this application.	Response from CWA: The MEGA review misrepresents the DEIR's scope, compliance, and technical foundation: 1. Need and Desirability – The DEIR assesses all three sustainability pillars (economic, social, environmental) and aligns with national, provincial, and municipal frameworks. Economic claims are backed by specialist reports. 2. Alternatives – The alternatives presented are appropriate and based on technical, spatial, and operational constraints. They reflect progressive refinement, not superficial variation. 3. Impact Assessment – The Noise Impact Assessment uses the mandated AEDT model per SANS 10117. Sense of place and socio-cultural issues are addressed in separate specialist studies. 4. CO₂ Emissions – The 56 million kg CO₂ saving is grounded in the PACE Diversion Airport Analysis (2019 data) and is based on industry-standard aircraft and route modelling—not assumption. 5. MSDF Application – The DEIR acknowledges both supportive and cautionary policies in the MSDF. Noise contour modelling is comprehensive, and any new developments near CWA would require fresh environmental approvals. 6. Independence – The DEIR's tone and content are consistent with EIA Regulations. References to sustainability frameworks and infrastructure goals are policy-based, not promotional. In summary, the DEIR is balanced, evidence-based, and compliant. The MEGA critique is largely unfounded or misdirected. Individual comments raised in this report will be answered separately.
		ALTERNATIVES 50. The evaluation of alternatives in the amended DEIR is seriously flawed for the reasons explained below. As these comments illustrate, the consideration of	EAP response: The biophysical “environmental harm” has been adequately assessed and balanced. Ito Location, the application site was the only location alternative

		alternatives fails to achieve the primary underlying rationale underpinning the process of evaluating project alternatives, namely, to achieve an outcome that satisfies the threshold of 'least environmental harm' in the ultimate alternative determined through the EIA process. This by necessity requires the consideration of various alternative options which may be available in terms of location, layout and technology, among other factors. The specific comments and concerns regarding alternatives are set out in more detail below:	from the initiation of the process considering it's an expansion of an existing airport and the additional land parcels adjacent to the current airport adhered to the requirements to enable the scope of the proposed project. Therefore, other alternative locations were not regarded as feasible. The comment is noted and responded to below where it is repeated. Response from CWA: The evaluation of alternatives in the amended DEIR is comprehensive, well-reasoned, and fully aligned with the requirements of the EIA Regulations. The assertion that it fails to identify the "least environmental harm" is incorrect when the technical, operational, regulatory, and land-use constraints specific to airport infrastructure are considered. Contextual Clarification: As outlined in the <i>CWA Alternatives Report</i> (August 2024), NEMA defines alternatives as including variations in location, activity, layout, and technology. However, the DEIR demonstrates that: • Alternative location is not feasible due to the extreme difficulty in securing 4.5 km of contiguous land in a topographically and aeronautically suitable position. This includes strict ICAO requirements related to runway orientation (based on prevailing winds), terrain clearance, zoning, and airspace integration. • Layout alternatives were evaluated using a 5-step runway planning process, considering safety, wind usability (ICAO's 95% rule), operational efficiency, and integration with CTIA's airspace. These led to the phased evolution from Alternative 1 (Do Nothing) to Alternative 4 (New Preferred Layout), with justified decisions to exclude the cross-runway (14-32). • Technology alternatives are addressed through a robust analysis of energy and sustainability solutions, including biodigesters, solar PV, wind energy, and advanced waste management systems—all aimed at reducing the development's ecological footprint.

			• No-Go Alternative was assessed in terms of current rights and infrastructure limitations. It fails to meet the project's strategic purpose, including its role as a designated alternate for CTIA, and would not meet the intended aviation, economic, or regional development gains. Physical and Planning Constraints: Airport site selection is not a typical land development exercise where multiple generic sites can be weighed against each other. Airports require: • Sufficient distance from other major airports to prevent airspace conflicts; • Alignment with controlled and coordinated airspace structures; • Flat land free of major terrain obstacles for safe approach and departure; • Proximity to the urban core—not too close to built-up areas, but not so distant as to become unviable; • At least 4.5 km of flat, developable land to accommodate a 3.5 km runway with safety zones; • Land parcels that are contiguous, amalgamated, and capable of being secured for aerodrome use; • Locations outside restricted zones, such as the Koeberg nuclear exclusion zone in Cape Town. In short, the number of technically feasible sites is extremely limited, and the current CWA site is the product of years of layered technical, spatial, and legal filtering, prior to the Scoping and EIA process. Conclusion: The alternatives analysis complies with the legal test of feasibility and reasonableness, with each step documented using structured methodology. The alternatives were selected based on aviation safety standards, site constraints, regulatory compliance, and environmental performance. This

			reflects exactly what the EIA Regulations require— not theoretical lowest-impact scenarios that are functionally not feasible.
		50.1. Section 8.1.2 of the amended DEIR is devoid of meaningful alternatives evaluation and rather serves as motivating the justification for only considering one site location, namely the current CWA site. Other options, such as alternative layouts or development footprints are not mentioned or considered.	EAP response: The development and listing of Alternatives occurs largely within the Scoping Phase, with further Alternative development within the EIA Phase as informed by IAP input and specialist assessment. It is unclear what is considered a <u>meaningful alternative</u> by the IAP. The reasoning for the selection, development and assessment of Alternatives is provided in Section 8 of the amended draft EIAR. Assessment of alternatives were 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 at an existing airport. The No Go was also assessed. Response from CWA: Refer response by CWA above. The DEIR appropriately justifies why the CWA site is the only feasible location and why layout changes have been limited to those that are functionally and environmentally viable. There is no omission—just the reality of airport planning constraints.
		50.2. There is insufficient evidence that various issues and/or questions in the Need and Desirability Guidelines have demonstrably informed the alternatives and/or comparatively assessing them, so as to lead to identification of alternatives that satisfy the threshold of 'least environmental harm'.	EAP response: The need and desirability of the proposed project is discussed in detail in section 5 of the amended draft EIAR, and according to the DEA&DP guideline document. The development of the preferred Alternative 4 relied on inputs from IAPs, Stakeholders, specialists and technical design personnel. The comment on assessment of Alternatives was answered above.

			Response from CWA: The DEIR applies the Need and Desirability Guidelines appropriately by assessing alternatives through the lens of feasibility, sustainability, and public interest, not abstract environmental minimisation alone. • The guideline’s intent is not to prescribe the lowest-impact option at all costs, but to ensure that reasonable and practical alternatives are compared—taking into account environmental, technical, and socio-economic considerations. • Alternatives 2 to 4 reflect progressive refinement based on aviation safety, environmental footprint, energy use, and land-use compatibility. • The “least environmental harm” threshold must be considered in relation to purpose—a site that cannot functionally support the project is not a valid alternative. The DEIR clearly shows that the selected alternative balances need, sustainability, and impact minimisation. It is fully compliant with the guideline’s purpose.
		50.3. Given the absence of alternatives and a comparative assessment between them, there is insufficient information that the preferred alternative will best give effect to sustainability targets. There is also insufficient information to conclude that the preferred alternative will not exceed thresholds of acceptable change or that it has the lowest adverse environmental and social impacts.	EAP response: The comment on assessment of Alternatives was answered above. Need and desirability is based on the principle of sustainability. The Guideline on Need and Desirability does not refer to <u>sustainability</u> targets, but rather to <u>ecological</u> targets and <u>conservation</u> targets, both of which are assessed by the Biophysical specialist reports for the proposed project. Thresholds of acceptable change are manifested within the mitigation hierarchy where if avoidance of impacts is not possible, alternatives that better mitigate and manage negative impacts should be considered. The unavoidable impacts of terrestrial vegetation and wetland loss thus resulted in the development of offset proposals as part of this project. Therefore where the threshold of acceptable change was exceeded it was offset.

			Environmental and social impacts are assessed as part of the proposed project, with impacts rated before mitigation and post mitigation, thus resulting in the lowest adverse (negative) environmental and social impacts for the Preferred Alternative 4. Response from CWA: The DEIR does include a comparative alternatives assessment—Alternatives 1 (No-Go), 2, 3, and 4—with clear reasoning for the progression and refinement based on environmental and operational performance. • The preferred alternative (Alternative 4) reflects reduced impact through removal of the cross runway, exclusion of wind turbines and poultry waste, refined layouts, and buffer zone integration. • Environmental thresholds (noise, air quality, biodiversity, etc.) have been tested against national standards (e.g. NAAQS, SANS 10103) and shown to remain within acceptable limits. • The DEIR provides sufficient detail to conclude that the preferred alternative meets sustainability and compliance benchmarks, while maintaining technical viability. The claim of insufficient information is incorrect. The preferred alternative is the outcome of a clear, phased, and well-documented refinement process aimed at minimising impact while delivering a functional, sustainable airport.
		50.4. Only two options are addressed in the amended DEIR namely the “no-go” option or the proposed CWA expansion project. This reinforces the inherent bias in favour of the preferred and only alternative assessed as comparing the project to the baseline of the status quo is skewed and is not in fact an alternative that in any way embraces the evaluation of alternatives.	EAP response: the comment on Alternatives has been addressed. Response from CWA: The assertion that only two alternatives are assessed is factually wrong. • The amended DEIR considers Alternatives 1 (No-Go), 2, 3, and 4, each involving different configurations, phasing approaches, and infrastructure elements.

			- These include changes to runway layout, the removal of the cross runway, adjustments to the biodigester inputs, and exclusion of wind energy infrastructure—all documented as refinements in response to environmental, stakeholder, and technical considerations. - The No-Go Option is a legal requirement under the EIA Regulations and provides a valid baseline for impact comparison. The claim that only one build alternative exists misrepresents the record. The DEIR reflects a proper alternatives evaluation process—not a binary choice.
		50.5. While the initial DEIR referred to 3 alternatives it also confirmed that Alternative 2 was simply dropped. The result is that Alternative 3 became the preferred alternative by default. Although Alternative 3 has been adjusted in some respects to now become preferred Alternative 4, the description of this as an alternative is misleading. Alternatives 2, 3 and 4 are merely variations of essentially the same development proposal. Alternatives 2, 3 and 4 do not differ from each other in any material respect.	EAP response: Alternative 2 was Scoped out resulting in the formulation of Alternative 3. The proposed scope and SDP for Alternative 2, 3 and 4 was developed through IAP, specialist, technical and stakeholder input, and resulted in different SDP layouts and project descriptions, as detailed in the amended draft EIAR. The impact assessment ratings for the various Alternatives varied, based on their individual scope. In the case of Biophysical impacts, in some instances the specialist found that the Biophysical impact remained the same which then resulted in the same rating. This was then explained in the individual reports. Response from CWA: The claim that Alternatives 2, 3, and 4 are materially identical is incorrect and disregards the documented changes in layout, components, and environmental approach. Alternative 2 was dropped based on public and specialist input—this reflects responsiveness, not avoidance. Alternative 3 was significantly refined into Alternative 4, incorporating changes including: - Removal of the cross runway (14-32) - Exclusion of chicken manure from the biodigester

			– Exclusion of wind energy infrastructure – Modified sewerage and fuel routing, and precinct boundary adjustments • These are substantive environmental and technical refinements. The evolution of the preferred alternative reflects what the EIA process is intended to achieve—a design that minimises impact while meeting project objectives. The alternatives are clearly distinguishable and properly assessed.
		50.6. The claim that comments received from I&APs informed amendments to the various technical and specialist reports and are addressed is disputed. This is evidenced by the fact that the amended DEIR states: “Due to the minor changes to the SDP and the project description for Alternative 4 (The Preferred Alternative), the specialists tended to rate it as similar to Alternative 2 and 3.”. It is clear that the changes made to ‘Alternative 3’ resulting in ‘Alternative 4’ were not driven by substantive input from I&APs or the imperative to avoid or further reduce adverse environmental impacts.	EAP response: IAP and stakeholder input informed the various technical and specialist reports. The impact assessment ratings for the various Alternatives varied, based on their individual scope. In the case of Biophysical impacts, in some instances the specialist found that the Biophysical impact remained the same which then resulted in the same rating. This was then explained in the individual reports. Refer Table 136 within the amended draft EIAR - Summary of issues by IAPs during Pre-application and In-process Scoping Phase, and In-Process EIA Phase (inclusive public meeting, farmers association meeting, & focus group meetings) for detail on how IAP input was considered in the EIA. Response from CWA: The evolution from Alternative 3 to Alternative 4 was directly informed by I&AP comments and specialist feedback, even if the specialists concluded that the overall impact significance remained similar. • The following changes were made in response to concerns raised: – Removal of wind turbines due to visual and biodiversity concerns – Exclusion of chicken manure from the biodigester due to odour and compatibility objections – Modification of the fuel line, sewer connection, and internal precinct layouts

			- While these adjustments may not have significantly altered impact ratings, they represent targeted refinements to address specific environmental and community concerns. - The quoted statement confirms the impact ratings remained similar, not that I&AP input was ignored. Substantive changes were made where feasible claims to the contrary overlook the record of iterative adjustment and consultation.
		50.7. I&APs have raised substantive concerns about the significant HIGH NEGATIVE noise impacts but there has been no substantive change through a layout or design response to indicate that impact avoidance has been adhered to in the selection of the preferred alternative. The EAP ought to have listed the environmentally related rationale for the changes made in the refinement and selection of the preferred alternative, but this was not done. As this has not been done, the only realistic explanation that technical feasibility and/or cost factors have dominated.	EAP response: Noise impacts post mitigation rate as Medium Negative, which is deemed acceptable if all mitigation is implemented. Refer Table 136 within the amended draft EIAR - Summary of issues by IAPs during Pre-application and In-process Scoping Phase, and In-Process EIA Phase (inclusive public meeting, farmers association meeting, & focus group meetings) for detail on how IAP input on noise was considered in the EIA. Response from CWA: The claim that noise concerns were ignored in layout and design refinements is incorrect. Runway orientation and phasing were determined based on prevailing wind patterns, safety, and ICAO standards, which inherently limit layout flexibility—but these same constraints also reduce crosswind usage and localised noise exposure. - The removal of the cross runway (14-32)—a direct response to I&AP input—significantly reduced potential noise dispersion to adjacent areas. - A displaced threshold, combined with runway lighting within the airport boundary, results in aircraft touching down further along the

			runway, away from the threshold—this has a substantial mitigating effect on noise exposure for surrounding communities. Noise contours were modelled for each phase and form part of the impact avoidance strategy, alongside buffer zones, land use compatibility screening, and phased growth to prevent early intensification. The DEIR clearly shows that technical feasibility, environmental performance, and public input all informed the layout. The accusation that cost alone drove decisions is speculative and unfounded
		50.8. There is no evidence of any reasonable or reasoned justification for why there is no attempt to avoid and minimise negative noise impacts - which will have a deleterious effect on the Garden Cities landholdings and/or the residential communities who will be most directly impacted by the project. The failure not only means the issue of alternatives is effectively sidestepped but it implicates the principle of environmental justice.	EAP response: This comment has been addressed above. Response from CWA: This claim is incorrect and disregards the evidence presented in both the DEIR and the Noise Impact Assessment. Noise impact avoidance and minimisation measures are clearly demonstrated, including: – Runway orientation based on wind compliance to reduce off-axis noise exposure – Removal of the cross runway (14-32), which had the greatest potential to affect adjacent communities – Displaced thresholds and internal lighting, shifting aircraft landings further into the site and away from surrounding properties – Phased development, avoiding early over-intensification - These measures directly benefit nearby landholdings, including Garden Cities property, and reduce exposure at sensitive receptors like Greenville and Bella Riva. The suggestion that alternatives were ignored or that environmental justice has been undermined is factually and legally baseless. Avoidance,

			minimisation, and compliance with health-based noise standards (SANS 10103) are clearly evident.
		50.9. The amended DEIR entrenches the applicant's preference by purporting to derive a so-called 'new' preferred alternative each time an incremental modification to the proposed project is made. The evaluation of alternatives has been undertaken in isolation and there is no meaningful attempt to integrate the mitigation hierarchy into the evaluation of alternatives. The 2013 DEA&DP Guideline on Alternatives is relevant here and emphasises the primary objective underpinning alternatives must be to avoid all negative impacts, rather than to minimise them. Due to the lack of genuine identification of alternatives, this primary objective has not been met. Instead, a disproportionate amount of effort has been placed on justifying the site location and the size of the development which is indicative of an evaluation that is neither impartial nor appropriate as it entrenches an applicant favoured bias.	EAP response: The development of Alternatives followed due process, and the implementation of the mitigation hierarchy has been addressed above. Response from CWA: The DEIR does not entrench bias—it applies the EIA Regulations and the 2013 DEA&DP Guideline on Alternatives correctly and transparently. • The refinement from Alternative 2 to 3 to 4 is not superficial—each change involved elimination or reduction of specific impacts, including removal of the cross runway, exclusion of chicken manure, removal of wind turbines, and layout adjustments. These changes reflect the avoidance and minimisation steps of the mitigation hierarchy in practice. • The guideline promotes the objective of avoiding impacts where feasible—but acknowledges that infrastructure projects like airports cannot eliminate all impacts, and where avoidance is not possible, minimisation, mitigation, and offsetting are legitimate and required. • The site was not arbitrarily selected—it is one of very few technically and spatially viable options due to constraints including airspace, flat terrain, distance from CTIA, and exclusion zones like Koeberg. There is no applicant bias—the DEIR reflects a stepwise, reasoned application of alternatives evaluation within the bounds of real-world feasibility and regulatory standards. Avoidance has been applied where possible; minimisation and mitigation follow where it is not.

		50.10. The amended DEIR states that “Alternative 3 was amended to exclude chicken manure to the biodigester; to remove wind energy; to include both sewer to onsite treatment and Fisantekraal WWTW; to include the additional borehole drilled; to amend the SDP to show the incoming potable line from the southwest, the extension of the fuel line into the GA area and to make minor amendments to internal precinct boundaries. This resulted in the New Preferred Alternative 4 which was assessed in this amended draft EIAR.” Except to say that the impacts and their significance have not altered materially (i.e. adverse impacts have not reduced in significance, for example). This reinforces the concern that Alternatives 3 and 4 are not in fact genuine alternatives aimed at avoiding adverse impacts. The so-called alternatives are simply modifications or variations of the essentially the same project.	EAP response: The development of Alternatives followed due process, and the implementation of the mitigation hierarchy has been addressed above. Response from CWA: The transition from Alternative 3 to 4 reflects targeted impact avoidance and design improvements, consistent with the EIA Regulations and mitigation hierarchy. Key points: • The removal of chicken manure and wind turbines, changes to sewer treatment, and the revised fuel line and potable water connection all responded directly to stakeholder and specialist input to address environmental and operational risks. • The fact that overall significance ratings remained the same does not mean impacts weren’t reduced—it means they were already within acceptable thresholds. The refinements helped avoid or reduce exposure, especially near sensitive receptors. • Alternatives 3 and 4 are part of a progressive refinement process, not distinct stand-alone projects. This is common and appropriate in infrastructure EIAs, especially where core location and function are fixed. Alternative 4 reflects applied avoidance. The EIA process has worked as intended.
		50.11. The amended DEIR equate modifications to essentially the same project proposal with a ‘new preferred alternative’ thereby creating the false impression that notable and/or material changes have been introduced to avoid adverse environmental impacts. Incremental modifications, as has taken place in this case must be documented so as to ensure there is a complete and accurate description of the proposed project. If an incremental modification results in a new impact or changes	EAP response: The development of Alternatives followed due process, and the implementation of the mitigation hierarchy has been addressed above. Refer Table 136 within the amended draft EIAR - Summary of issues by IAPs during Pre-application and In-process Scoping Phase, and In-Process EIA Phase

		the nature of an existing impact, this must of course also be noted and the reason underpinning the modification must be made explicitly clear to enable I&APs to ascertain how the modification has responded to a particular concern or impact, and whether the modification is adequate in terms of the mitigation hierarchy.	(inclusive public meeting, farmers association meeting, & focus group meetings) for detail on how IAP input was considered in the EIA. Response from CWA: The DEIR correctly presents Alternative 4 as the new preferred alternative because it incorporates clear and documented design refinements made in direct response to stakeholder and specialist input. • These refinements—such as the removal of the cross runway, exclusion of chicken manure, withdrawal of wind energy infrastructure, and service routing adjustments—are material in terms of layout, infrastructure, and compatibility with surrounding land uses. • Each modification is transparently recorded and linked to its rationale, and the Specialist Impact Assessments confirm whether these changes resulted in altered significance ratings. • While some impact ratings remained unchanged, that reflects the effectiveness of earlier mitigation and the fact that the refinements were preventative and precautionary, not reactive to new impacts.
	50.12. I&APs are at a distinct disadvantage as it is not clearly specified as to whether the modifications that were made to Alternative 3 were due to environmental impact factors or due to technical feasibility issues. The relative advantages of the modifications from an environmental impact perspective, are also not described.	EAP response: The development of Alternatives and the implementation of the mitigation hierarchy has been addressed above. Refer Table 136 within the amended draft EIAR - Summary of issues by IAPs during Pre-application and In-process Scoping Phase, and In-Process EIA Phase (inclusive public meeting, farmers association meeting, & focus group meetings) for detail on how IAP input was considered in the EIA. Response from CWA: I&APs are not at a distinct disadvantage. The DEIR and specialist reports:	

			- Clearly document each modification from Alternative 3 to 4, including what was changed and why. - Indicate where changes were driven by environmental concerns (e.g. removal of wind turbines and chicken manure) and where changes addressed technical or service delivery feasibility (e.g. sewer and fuel line routing). - Confirm that these changes were assessed by specialists to determine whether any new impacts were introduced or existing ones reduced. All reports were made available for public review, and the public participation process allowed I&APs to engage with both the rationale and consequences of modifications. The process has been transparent and procedurally fair—there is no basis to claim I&APs were disadvantaged.
		50.13. The fact that incremental modifications have occurred, as opposed to genuinely different alternatives is shown by the fact that significance ratings have not been influenced by these changes. Thus, reinforcing the concern that the assessment of alternatives is materially deficient.	EAP response: this comment has been addressed. To include alternatives that is not reasonable or feasible is not rational. Response from CWA: The expectation that multiple, materially different airport alternatives should be presented misunderstands the unique and rigid constraints inherent to airside infrastructure planning. Unlike typical developments, airports are subject to exceptional physical, regulatory, and operational limitations that severely restrict the range of viable alternatives. Why Airside Infrastructure Alternatives Are Limited: Airspace coordination and separation: Airports must be sited far enough from other major airports (e.g. CTIA) to avoid airspace conflicts, but close enough to remain functionally relevant. Air traffic control, approach paths, and flight corridors must integrate seamlessly with national and regional aviation systems. Wind direction and runway orientation: Runways must align with prevailing winds to comply with the ICAO 95% usability rule.

			Deviations from this principle increase safety risks and operational inefficiencies. 3. Flat, unobstructed terrain: Runways require long, flat corridors—at least 4.5 km of uninterrupted land—with minimal slope and free from terrain, buildings, and obstructions within protected obstacle limitation surfaces (OLS). Cape Town’s geography limits such opportunities. 4. Distance from densely built-up areas: Airports must balance proximity to the urban core with noise, safety, and land use compatibility. Too close, and environmental impacts and planning conflicts arise. Too far, and accessibility and public benefit are compromised. 5. Contiguous land capable of assembly: Suitable sites must consist of amalgamated parcels that can be secured legally and operationally. This is rarely possible without extensive negotiations, relocations, or planning interventions. 6. Regulatory constraints: In Cape Town, candidate sites must lie outside the Koeberg Nuclear Exclusion Zone, wetlands, or flood-prone areas, and avoid encroaching on protected biodiversity zones or strategic agricultural land. Given these factors, very few sites exist that can host an international-capable airport. Once a technically viable site is identified—as is the case with the existing CWA platform—realistic layout alternatives are constrained by operational and safety requirements, not preference or cost. Therefore, airside infrastructure cannot be evaluated like a housing development or commercial estate. The DEIR reflects this reality: it refines the layout and infrastructure within the fixed location to improve environmental outcomes while maintaining functional integrity. The alternatives presented are appropriate, justified, and legally and technically defensible.

		50.14. Issues such as extending a fuel line would not seem to offer any environmental advantage and may in fact expand the potential risk area insofar as fuel leaks are concerned. The risk results in the Major Hazard Installation study may also be affected.	EAP response: The expansion of the fuel line was described to specialists and assessed as Alternative 4 with resultant impact ratings. The lengthening is a minor adjustment, but it will result in a reduction of bowser movement, resulting in less fuel used, which is a cost saving and a reduction in carbon emissions. The MHI is unaffected by the amendment to the fuel line. The MHI concludes that the facility will have a low hazard rating, and the lengthening of the pipeline will not materially impact the risk rating or conclusions. The final MHI will accompany detailed design and layout as part of building plan approval.
		50.15. While the amended DEIR that during the Scoping Phase location alternatives was considered, but location alternatives were scoped out. The report reinforces I&AP concern that alternatives were in fact not assessed as the application site is the only reasonable and feasible location. This is unsubstantiated. No description of which locations were considered is provided. Also, there is no explanation as to why location alternatives were rejected provided. If location alternatives were indeed considered, no information was provided in the initial DEIR dated November 2024 to detail or describe this. This information is also not provided in the amended DEIR. The 2013 DEA&DP Guideline on Alternatives states that “The identification of alternatives should be broad, objectively done and well documented.” This is clearly not the case here. The information and evaluation are both materially deficient.	EAP response: This comment on Alternatives has been addressed. Also refer section 8 on Alternatives in the amended draft EIAR. To include alternatives that is not reasonable or feasible is not rational. Response from CWA: The claim that no location alternatives were considered or substantiated is incorrect. While the amended DEIR may not include an exhaustive breakdown of all parcels assessed, the conclusion that CWA is the only reasonable and feasible location is a product of extensive feasibility screening, prior to the start of the EIA process, not oversight. Airports require highly specific conditions: • Proximity to the metro but outside dense urban zones, • Flat topography for a 3.5 km runway and associated RESAs, • Separation from other major airports (e.g., CTIA), • Location outside nuclear safety exclusion zones (e.g., Koeberg), • Avoidance of mountainous terrain or critical biodiversity areas, • Amalgamated and secure land parcels,

			• Airspace compatibility with Cape Town TMA, • Minimal relocation or expropriation impact, • And access to bulk infrastructure. These criteria severely constrain alternative sites. Other options were indeed explored but eliminated due to insurmountable constraints, including airspace conflicts, topography, or exclusion zones. The complexity of airport siting is such that only a handful of sites in the Cape Town region could ever technically qualify, let alone proceed to comparative evaluation. Hence, the assertion of material deficiency lacks appreciation for site-specific feasibility in airport planning. In accordance with the Scoping Report, Cape Winelands Airport did not assess alternative locations for the proposed development. This is because the nature of the activity—namely the operation and expansion of an airport—remains fixed. The proposal constitutes the expansion and formalisation of an existing airport, with current infrastructure and existing development rights already in place on the site. As such, this is not a greenfield development requiring consideration of new locations. The airport is already established at its present site, and the proposed project builds upon that footprint. The activity is intrinsically tied to the location, which has historically functioned as an airfield. Given that no alternative locations were introduced during the scoping phase and considering that the statutory process does not require alternatives that are not reasonable or feasible, it would be inappropriate to now introduce speculative location alternatives during the impact assessment phase. The project therefore proceeds on the basis that there are no viable location alternatives, and that the environmental assessment focuses on understanding the impacts of expanding the existing airport at its current, lawful site.
		50.16. Regarding the selection of the Fisantekraal location: “While originally designed for wartime aviation, the site was also selected with	EAP response:

		future expansion in mind, making it a long-term asset for aviation infrastructure.” In the absence of reference to credible research that provides irrefutable proof of this contention, it stands to be rejected as a further measure employed by the EAP to place the project in a favourable light. Unsubstantiated statements to support the current location of the project are made in such a manner as to entrench a pro-development bias at the applicant’s preferred location.	The statement <i>the site was also selected with future expansion in mind, making it a long-term asset for aviation infrastructure</i> refers to the Applicant’s original motivation in obtaining the site. The site was not selected based on only the immediate use based on the existing rights, but also the future expansion potential. The Applicant has extensive experience in airport development and operation. Response from CWA: The selection of the site by the CWA executive was not incidental—it was made with future expansion explicitly in mind. The location was chosen based on key strategic criteria: proximity to Cape Town while remaining outside of dense urban development, compatibility with existing airspace infrastructure, and sufficient land area (including flat, unobstructed terrain) to accommodate a 3.5 km runway and associated facilities. This decision was informed by technical due diligence, long-term aviation forecasts, and industry-standard requirements for international airports. As such, the site was not selected arbitrarily, but rather as a purposeful investment in a location uniquely suited for scalable aviation infrastructure—meeting the dual objective of upgrading an existing facility and fulfilling long-term regional air access needs.
	50.17.	The alternative of improving or upgrading the CWA, based on the existing facilities is also a reasonable and feasible alternative, but this has not been considered. This could enable the general aviation activities to operate safely and efficiently, without taking up capacity at CTIA.	EAP response: The Alternative proposed by the IAP is not reasonable or feasible and will not be included in Alternatives for the proposed project. Response from CWA: This is not a greenfield development, but rather a strategic expansion of an existing airport with lawful rights and infrastructure already in place.

			The project specifically aims to formalise and enhance current general aviation operations while enabling future commercial and cargo capacity as regional demand grows. The concept of phased expansion is embedded in the preferred development approach. The proposal represents a measured, staged progression from current use toward a broader and regionally significant aviation role, with general aviation serving as both the starting point and a continuous component of the long-term vision.
		50.18. An alternative layout, or adaptations to the layout, including a decrease in the development footprint have not been considered. This is of particular concern of I&APs, as a reduced footprint would enable an increased buffer to be provided between the proposed CWA expansion site and surrounding land uses (both current and planned in light of the planned urban expansion of residential areas).	EAP response: The query was answered in a previous round of PPP with the same IAP (Refer Appendix 29C to the amended draft EIAR). Layout adaptations are incorporated in the evolution from Alternative 2, 3 and 4. There is at present no requirement for a buffer between the proposed CWA expansion and surrounding land uses, therefore the EAP is unclear how this can be increased. Response from CWA: The suggestion that alternative layouts or footprint reductions have not been considered is incorrect. Over the course of the planning process, many different layout configurations have been examined to balance environmental, aviation safety, and land use constraints. These include variations in runway orientation, taxiway and apron positioning, terminal locations, and service infrastructure corridors. Each iteration has been refined in response to stakeholder input, technical feasibility, and the mitigation hierarchy. For example, the removal of the cross runway, re-routing of utility lines, and internal precinct realignments all demonstrate efforts to reduce the development footprint and manage environmental impact. Further reductions are constrained by strict aviation requirements such as obstacle limitation surfaces, minimum safety zones, and the need for 3.5 km

			of flat terrain for the main runway. A meaningful buffer already exists due to the historical separation between the airfield and adjoining properties. Proximity concerns should reasonably be addressed in the planning of future developments around an established, lawful airport—not by compromising the safety or operability of critical infrastructure.
		50.19. The reasons for selecting the site provided are mostly technical reasons, without any clear indication that these reasons have been informed by an environmental impact perspective and/or the mitigation hierarchy. The following statements demonstrate that the impact mitigation hierarchy has not been applied appropriately: “Best practice in airport planning dictates that airports should be located on the periphery of urban development to limit noise disruption to residential areas.” “The Cape Winelands Airport (CWA) is strategically positioned along the Urban Edge, with the majority of its surrounding land being agricultural. This natural buffer zone significantly reduces the number of people affected by aircraft noise compared to airports located within densely populated areas.”	EAP response: Initial site selection was of a technical nature during the planning phase. Assessment of environmental impacts on the site and possible application of the mitigation hierarchy follows during the EIA process. Response from CWA: The statements cited reflect the kind of environmentally informed decision-making required by the mitigation hierarchy—they illustrate impact avoidance at the highest level, through location selection. The site's placement along the Urban Edge, surrounded largely by agricultural land, is a direct attempt to minimise long-term noise exposure and reduce the number of sensitive receptors affected. This is the first step of the hierarchy: avoidance. Moreover, airport planning by necessity involves a range of interdependent constraints—airspace integration, obstacle clearance, noise buffers, accessibility, and geological stability. These are not merely technical but integrally tied to environmental and social impacts. The selection of the CWA site aligns with the principle of directing high-impact land uses away from built-up areas and into lower-conflict zones, which is the essence of sustainable spatial planning. To suggest that this locational reasoning is devoid of environmental consideration is both inaccurate and inconsistent with the principles of EIA, which recognize the strategic function of site selection in reducing environmental harm.

		50.20. The approach to alternatives ignores the concerns that have been raised about noise impacts by farming enterprises, concerns by Garden Cities whose landholdings will bear the brunt of noise related impacts and County Fair to the west of the CWA site, as well as a resident that runs a parrot rehabilitation facility etc. There is no evidence that the design of the preferred alternative has responded to these concerns by avoiding high negative noise related impacts on these receptors.	EAP response: The concern has been previously addressed. Communication and engagement with the parrot rehabilitation facility is ongoing and provided in this C&R, and in the previous C&R (Appendix 29C to the amended draft EIAR) and indicated that the rehabilitation centre is outside the Lrdn of 55dBA, and that the airport contribution to the noise level at the parrots' location will be around 47dBA. The surrounding future residential areas around CWA is not developed yet and the approval status of this is inconclusive. CWA is in negotiations to find amenable solutions where development is integrated. County Fair and Bella Riva matters are handles under its own section in the C&R report. Response from CWA: The concerns raised by local stakeholders—including Garden Cities, County Fair, and private landowners—have been acknowledged and directly informed the project's iterative design process. Many different layouts have been reviewed over the years with the explicit goal of minimising adverse impacts, particularly related to noise. These refinements include repositioning runway thresholds, removing the cross-runway, and optimizing flight paths for noise abatement. Moreover, Cape Winelands Airport (CWA) has proactively engaged affected parties including County Fair. In the case of the parrot rehabilitation facility, the owners have responded positively, stating: <i>"My husband and I would like to be part of the solution instead of the problem. So yes, I would like to accept the proposal you have put on the table... I also have the opportunity to do the snake catcher course now, I believe it could also be an asset to CWA... Yes, it's cobra world, in the summer we catch and release an average of 3 in a month. I would like to hear from you."</i> This confirms a willingness to collaborate and integrate their operations into the airport ecosystem, including potential roles in runway dog handling and wildlife rescue. Therefore, the claim that the design of the preferred alternative has not responded to these receptors is inaccurate. On the contrary, a clear record of

			engagement and mitigation-driven planning exists to demonstrate alignment with environmental justice and sustainable development principles.
		50.21. The approach to alternatives ignores the spatial planning imperatives in the City of Cape Town's MSDF, where it is clearly evident that residential development is to take place in several locations in close proximity to the CWA site, including directly adjacent to its southern border. Affected residential areas are Mikpunt to the north, Garden Cities landholdings to the south and Bella Riva to the west. Moreover, the Fisantekraal community, which is located to the south-west of the CWA site is growing, as is evident from viewing the area on Google Earth. The Fisantekraal community is approximately 1.5kms away from the south-western corner of the CWA site. Other communities which are also expanding, such as Kraaifontein and Uitzicht are located around 5-6kms to the south-west. Here are also several small holdings to the south and east of the CWA site. Again, there is no evidence that the design of the preferred alternative has responded to these concerns by avoiding high negative noise related impacts on these receptors.	EAP response: The Noise Impact Assessment indicates noise contours for the proposed project and the impact on surrounding land uses. Receptors in the surrounding land parcels are identified as part of this process. Residential development is located outside the Lrdn of 55dBA. One farmhouse to the north is affected, but the landowner does not object. Mitigation is proposed in the NIA, and additional to this has been the development of alternative land use options for the surrounding affected land parcels. This process is ongoing and relies on ongoing engagement with these landowners. Height restriction to adjacent land uses has also been assessed and where applicable, alternative land use options are being considered for these land parcels. Considering that the surrounding areas affected inside the Lrdn of 55dBA is not developed, integration is possible from an urban design perspective. CWA has initiated this integration with Bella Riva. CWA is in discussion with GS and considering the large property extension of GS integrated urban planning is possible. Response from CWA: The suggestion that the evaluation of alternatives ignores spatial planning imperatives is unfounded. From an aviation and environmental planning perspective, the relevant metric is not distance from the site boundary, but distance from the runway. In this regard: • Fisantekraal lies approximately 2.5 km, and Mikpunt approximately 2.7 km, from the proposed main runway. These are material

			separation distances that exceed typical buffer distances used in global best practice for general aviation airfields. • Garden Cities’ land directly south of the runway, defined as Remaining Portion 4 (384.42 ha), currently holds no valid development rights. These rights have lapsed and any future development would require a new EIA that must consider the pre-existing aviation use of the site. • Bella Riva, to the west, has also submitted a completely new EIA in acknowledgment of CWA’s development, with the prior plans effectively superseded. The land is currently agricultural in nature. CWA has in fact been operating lawfully since 1943 and predates the planning instruments cited. Its operations are entrenched under NEMA’s principles of lawful continuation of use. Planning around it must logically account for its operational status as a permanent fixture. The assertion that CWA has ignored spatial imperatives is not supported by the facts. The preferred alternative reflects a deeply considered and responsible evolution of a site that already lawfully supports aviation activity.

			parts of Khayelitsha and Mitchells Plain, whereas CWA's location—selected for its minimal residential encroachment—allows for lower cumulative impact on surrounding communities. This is not an “unsubstantiated inference”, but rather an evidence-based land use planning principle: airports should be positioned away from high-density housing, with natural buffers (such as agricultural land). CWA's existing zoning, separation from urban cores, and orientation align with ICAO and local planning standards. The inference that this comparison is problematic fails to acknowledge that CWA's site was selected precisely because it avoids the spatial and social constraints that now limit CTIA's long-term expansion. Using this comparison underscores the rationality and necessity of CWA's development in support of the region's aviation needs.
		50.23. The concerns regarding the above statement are amplified below:	-
		50.23.1. A location close to CTIA is not under consideration as an alternative, thus the comparison with CTIA is speculative and irrelevant. The inference drawn is that the reference to CTIA is opportunistic and is designed to place the proposed CWA expansion project in a favourable light. Again, further evidence of bias in favour of the project.	EAP response: The IAP is correct in that no alternative location is under consideration. The proposed project is for the expansion of an existing airport at an existing site with existing impacts. Any comparison drawn with CTIA is relevant as it serves as a point of reference for other IAPs and stakeholders and builds on the known attributes for CTIA. Response from CWA: The comparison with CTIA is neither speculative nor opportunistic—it is a necessary contextual reference for evaluating the strategic positioning of CWA. In the absence of another major airport in the Cape Town metropolitan region, CTIA provides the only available benchmark for regional airspace, infrastructure constraints, and urban integration challenges. It is standard practice in aviation and regional planning to evaluate how new or expanded airports complement existing infrastructure, particularly in the

			context of multi-airport systems. The reference to CTIA is used to demonstrate why a second airport is needed and why CWA offers a lower impact and more future-proof location—a fact supported by land use separation, buffer zones, and operational runway alignment. This is not bias; it is informed spatial and aviation planning, consistent with the City's own MSDP and international best practice. Ignoring CTIA's constraints and lessons would be irresponsible in the context of long-term metropolitan aviation strategy.
		50.23.2. Applicable spatial plans for the Fisantekraal area demonstrate clearly that additional residential development is envisaged and this poses the risk that CWA could face exactly the same difficulties regarding noise as the amended DEIR acknowledges CTIA is currently facing, yet there is no evidence that the design of the preferred alternative has responded to these concerns by avoiding high negative noise related impacts on these receptors.	EAP response: The EIA process for CWA allows for some of the mistakes learnt from CTIA and its development over time, to be better managed or designed for, including adjacent land uses. The main difference between CWA and CTIA is that CWA is currently in an undeveloped area, with no residential areas inside the Lrdn of 55dBA, where land-uses can be integrated. CTIA is in a built-up area with many established residential areas inside the Lrdn of 55dBA. Response from CWA: While spatial plans do indicate potential future residential expansion in the broader Fisantekraal area, it is important to emphasize that Garden Cities' rights for the land directly south of the airport have lapsed, and no new rights currently exist to build in that location. Any future development will require a fresh EIA, during which noise compatibility with CWA will be a key consideration. Moreover, the layout and orientation of the CWA runways have already been optimised based on many alternatives considered over several years to minimize environmental and community impacts—including noise. Unlike CTIA, which is now constrained by dense surrounding development, CWA benefits from natural buffers of agricultural land and low-density settlement patterns and is proactively planning to mitigate future conflict zones.

			CWA’s approach is fundamentally different: instead of being retrofitted into a congested area, it has been strategically positioned and planned to avoid foreseeable land use conflicts. The mitigation hierarchy was applied upfront, and future development adjacent to CWA must now demonstrate compatibility with an operational airport—not the other way around. Response from town planner: No existing residential area, nor any land zoned for residential, falls within the 55 dB(A) noise contours area. All the land (except CWA’s land with Airport rights) impacted upon by the 65 dB(A) noise contour is zoned “Agricultural”. The MSDF and the Northern District Plan indicate the areas directly to the south and the west of the site is indicted as “Incremental Growth and Development Area” in the MSDF and as “New Development Area” District Plan. The subdistrict 3 plan, within the NDP, shows GC and BR as “Potential High Density Residential” see below

		50.23.3. Most of the directly impacted communities and planned residential areas are located on the southern side of the CWA site, which is likely to be the most common approach route of the aircraft, thus exacerbating already significant potential noise related impacts, particularly the higher noise levels closer to the ground associated with aircraft landing approach and take-off.	In this context it is important that s.9 and s.16 of the MPBL specifically records that the MSDF and District Plans do not grant rights or take rights away. To develop these properties would require an EIA and rezoning application during which the most appropriate use and mitigation measures can be determined. This could include a Mixed-Use Zone as a buffer with higher noise tolerances. EAP response: Noise related impacts are modelled to the South and to the West of CWA, in line with the proposed flight route. The NIA models the impacts on the ground and on takeoff / approach, so it is already included in the NIA and not an additionality. Response from CWA:

			The inference that southern communities will experience the highest noise impacts misunderstands basic aeronautical and environmental realities. The predominant wind in the region is a south-easterly, which means aircraft will typically land from the north and take off toward the south. As a result: • Approaching aircraft will arrive from the north, remaining far from Garden Cities' land to the south. • Departing aircraft will be well airborne and at significant altitude by the time they overfly the southern boundary, reducing noise impacts materially in these areas. Furthermore, the runway threshold has been displaced northwards, shifting the highest intensity noise zone away from the southern edge of the site. Garden Cities' land to the south has no valid development rights and any future development there will need to prove compatibility with a fully operational airport, not the other way around. The layout of the airport already reflects best practice by avoiding sensitive receptors to the extent reasonably possible. Response from town planner: There are no existing residential areas, nor any land zoned for residential, that falls within the 65 dB(A) noise contours area. All the land (except CWA's land with Airport rights) impacted upon by the 65 dB(A) noise contour is zoned "Agricultural". In this context it is important to point out that s.9 and s.16 of the MPBL specifically records that the MSDF and District Plans do not grant rights or take rights away. To develop these properties would require an EIA and rezoning application during which the most appropriate use and mitigation measures can be determined. It should be noted that the MSDF Policy Statement 16.6 would require such a rezoning to be for a compatible land use even if authorisation for the proposed expansion of the airport is not granted P16.6 Land development at, or close to, an airport or airfield that is incompatible with any existing or potential future aviation rights will not be supported (Table 8 - Development Directives).

		50.24. Also relevant to the comment and serious that the approach to alternatives is materially deficient is the NIA which discusses three scenarios. Scenario 1 does not correlate with the 'no go' / 'no development' alternative described in the amended DEIR. The base case (Scenario 1) relied upon in the NIA relies on the maximum capacity of existing facilities i.e. full operation of all four of the existing runways at the CWA site. As explained, this approach is misleading and clearly not an accurate reflection of the current situation.	EAP Response: Alternative 1 as per the EIA is “Do Nothing”, which implies development within current rights = Scenario 1: Existing runways at full capacity. Response from CWA: Scenario 1 in the NIA is entirely consistent with accepted EIA practice: a "No-Go" scenario must reflect the <i>lawful, full utilisation</i> of existing infrastructure—not merely current activity levels. Cape Winelands Airport has operated lawfully since 1943 and maintains four intersecting runways. All four are legally usable and have been in use, even if some are used more frequently than others. Scenario 1 therefore reflects the maximum permissible use under existing lawful rights—not a hypothetical. This is both accurate and appropriate. Dismissing it as misleading undermines the EIA's requirement to assess the worst-case baseline under lawful operation. The scenario is not intended to reflect today's operations, but the <i>full legal potential</i> of the existing airfield, which remains valid under South African environmental law.
		50.25. The explanation offered by the EAP in the Comments and Responses Report (CRR) is: “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&APs with an accurate understanding of the implications under this scenario.” The explanation that “we will use current infrastructure and rights to allow for maximum throughput i.e. all four runways” sounds more like a threat than a rational and reasoned explanation. On what basis is this threat made in order to justify the failure to approach the potential noise impacts fairly and objectively? Moreover, given the	EAP response: The response referred to is not a threat but a realistic scenario of the number of flights that can utilise the airport within its current rights. It was offered by <u>CWA</u> and not the <u>EAP</u> and confirms the approach by CWA to execute their rights if required. Response from CWA: The explanation in the Comments and Responses Report is neither a threat nor unreasonable—it reflects a factual and lawful fallback position in line with NEMA principles. CWA has existing infrastructure and lawful use rights dating back to 1943. As such, Scenario 1 must reflect the full legal operational capacity of the site if no expansion proceeds. Anything less would mislead

		constraints of the current as built runways a Beachcraft 1900 is the largest airplane that can be safely operated from Fisantekraal currently. The threat of maximum throughput using all four runways is skewed and misleading.	stakeholders and understate the environmental implications of the “No-Go” alternative. Moreover, referencing the Beechcraft 1900 as the largest currently used aircraft is misleading. The noise modelling is not based on actual use today, but rather on the maximum throughput permissible under the current airfield configuration. This ensures an apples-to-apples comparison with the expanded scenario. It is not a “threat,” but a rational, worst-case baseline, in accordance with standard EIA methodology and the precautionary principle.
	50.26. The EAP’s approach is scaremongering and deliberately falls back on the ‘worst case’ scenario as a base case for evaluation of noise-related impacts. This is unreasonable and unfair. Using this ‘worst case’ scenario as the baseline entrenches a pro-development bias in favour of the applicant as it clearly is aimed at positioning the proposed development more favourably, on a comparative basis, from a noise impact perspective. The concern is that deliberately selecting as baseline that is skewed because it is more favourably disposed to the proposed development downplays and underrepresents the associated noise impact.	EAP response: The term worst-case is not used as scaremongering, it is commonly used in the NIA between scenarios to describe the optimal/maximum case. Response from CWA: Using the lawful, maximum operational capacity of the existing airport as the Scenario 1 baseline is not scaremongering—it is consistent with EIA norms. The baseline must represent a valid “No-Go” alternative, which by definition includes the full legal rights and infrastructure already in place, not the current underutilisation of those rights. This approach ensures transparency about what could legally occur if the project is not approved, providing stakeholders and decision-makers with a realistic and precautionary benchmark. It would be misleading—and potentially unlawful—to use a constrained or artificially limited baseline simply to inflate the impact of the proposed development. Rather than downplaying noise impacts, this comparison accurately reflects the legal fallback scenario, allowing I&APs to compare both the status quo maximum lawful use and the proposed project on equal footing. This is an objective and reasonable methodology.	
	50.27. A fully operational scenario based on current facilities – using “current infrastructure and rights to allow for maximum throughput i.e.	EAP Response:	

		all four runways” is also a distortion of the current factual baseline and its relevance to current noise levels. Maximum throughput using all four runways at full operational capacity is not the actual situation at present at the site. Only two runways are in operation, a third is used as a go-cart track and the fourth is not utilised at all. On what basis therefore is the ‘worst case’ scenario as a base case? Applying this methodology and approach in the NIA is disingenuous and a misrepresentation of the current factual operating situation.	As per the response above worst-case is not exclusively used for scenario 1. Each scenario/alternative has a worst-case/optimal/max level. The scenario 1/alternative 1 is an ever-increasing scenario as business grows at CWA. The current rights allow for growth up to a certain point being the worst-case/optimal/max level. In order to assess this scenario the same as the others, the upper level needs to be determined i.e. the worst-case. This is a realistic expectation, if anything less is assessed the likelihood of it being outdated at the time of an EA is good. The worst-case/optimal/max level is therefore preferred to assess. Response from CWA: This comment confuses current operational activity with the lawful baseline required in an Environmental Impact Assessment. The No-Go alternative in an EIA is not based on current usage but on the maximum permissible use of existing rights and infrastructure. This is aligned with the Department of Environmental Affairs and Tourism’s guidance on alternatives in EIA, which defines the No-Go alternative as the continuation of the lawful status quo— not temporary underuse. The fact that only two runways are used more frequently today does not negate the operational availability and legal right to use all four runways. The infrastructure exists, is maintained, and has been used historically for general aviation and training purposes. The other runways remain serviceable and can be activated without further environmental approvals. It is thus accurate and appropriate to model the No-Go scenario on the maximum operational capacity of the site. To do otherwise would artificially skew the comparative analysis, undermining the integrity of the assessment process. Far from being a distortion, this methodology provides a conservative and realistic benchmark against which the impacts of the proposed development can be fairly assessed.
	50.28.	The fully operational using all four runways or worst-case scenario has not been applied as a base case (i.e. ‘no go’ option) in any	EAP Response: As per above.

		other context besides noise. This creates a disparity in the evaluation of significance of the various project impacts and is inappropriate. Again, it entrenches a pro-development bias in favour of the applicant and is aimed at positioning the proposed development more favourably. Not only is the approach flawed from an EIA best practice perspective, but it is a material manipulation of potential impacts, affecting the credibility of the EIA process adversely.	Response from CWA: The use of the full operational scenario as the No-Go baseline in the Noise Impact Assessment is entirely appropriate, as noise impacts are directly dependent on aircraft movements and runway utilisation—both of which are legally permissible under existing rights. The distinction made in the DEIR is intentional and tailored to the specific impact being assessed, in line with accepted EIA practice that allows different baselines for different themes where justified. Using a maximum lawful use baseline for noise ensures that Interested and Affected Parties (I&APs) are given a realistic comparison of what could occur if the airport operates at its full legal capacity without new environmental approvals. For air quality or biodiversity, where emissions or disturbance are tied to specific proposed infrastructure, a current-use baseline may be more appropriate. This differentiated approach is not a manipulation, but rather a reflection of impact-specific relevance, aligning with EIA principles of contextual accuracy. Thus, the approach enhances the integrity and transparency of the assessment process.
		50.29. Given that fully operationalising the existing CWA facility is feasible – this must be so as it is given as the fall-back position if not all required approvals are obtained - then this ought to have been included as a reasonable and feasible alternative for assessment. In fact, in accordance with the requirements of the EIA Regulations, this ‘fully operational as is’ alternative must be assessed, including across all of the specialist study areas. This is because of the potential for different impacts and/or the nature and level of impact on environmental attributes to vary relative to the ‘no go’ option that has been used in all areas of identified impact except noise.	EAP response: The proposed project is for the expansion of the existing airport at the existing site, and with existing impacts. The No-Go Alternative described in the amended draft EIAR p390 states: <i>Alternative 1 The No Go with the development of the current CWA site within its current rights</i>, which is similar to Scenario 1 under the NIA. Response from CWA: The suggestion that the “fully operational as-is” scenario must be assessed as a separate alternative across all specialist studies misunderstands its role in the EIA. The ‘No-Go’ option already incorporates this scenario where relevant

			and lawful. For noise, it was appropriate to reflect maximum permissible use under existing rights to ensure a precautionary and legally grounded comparison. However, for other themes such as biodiversity or socio-economic impacts, where the current infrastructure's use has remained for decades, applying a maximum theoretical throughput would be misleading and distort real impacts. Rights to operate under this fall-back position are already entrenched and are not in need of an EIA. Including a full-scale operationalisation scenario in every specialist study would not yield meaningfully different or more accurate results, especially as the existing infrastructure is limited (e.g. no terminal, firefighting services, or commercial capacity). The assessment as structured is legally and methodologically sound.
		50.30. The NIA must be redone to include the same 'no go' alternative as has been applied in all the other specialist studies.	EAP response: The No-Go Alternative described in the amended draft EIAR p390 states: <i>Alternative 1 The No Go with the development of the current CWA site within its current rights</i>, which is similar to Scenario 1 under the NIA. Response from CWA: This request misunderstands the purpose of the noise baseline in the NIA. The so-called "fully operational" scenario used in the NIA is not an exaggeration but a legitimate lawful use baseline—reflecting what is permitted under existing rights and infrastructure, even if currently underutilised. This is consistent with the precautionary principle in environmental assessment, which requires decision-makers to assess impacts based on what is legally and technically possible, not just current usage. Using a "status quo" noise level would present a false and artificially low comparison, underestimating potential noise exposure if the site were fully used as permitted. Unlike other themes (e.g. biodiversity), noise is directly affected by intensity of legal use, and thus this higher baseline ensures a more accurate representation of the marginal impacts of the proposed development. The NIA therefore need not be redone, as it already applies the correct and defensible standard for assessing lawful use in a noise context.

		50.31. Since the applicant's fall-back position would require all four runways to be suitable for such use, this begs the question as to what is required to achieve this level of operation. This is not described in the amended DEIR. According to data provided in the NIA, it involves around 300 flight movements per day. Logic suggests that upgrading of some sort would be required, because if this were not the case, then surely all four runways would be in use now instead of only two. However, as indicated the third runway serves as a go-cart track and the fourth runway is out-of-use.	EAP response: The No-Go Alternative described in the amended draft EIAR p390 states: <i>Alternative 1 The No Go with the development of the current CWA site within its current rights.</i> Response from CWA: The comment inaccurately presents Scenario 1 as a “threat” or a fallback development plan requiring all four runways to be activated. In reality, Scenario 1 is a precautionary modelling construct used to reflect the <i>theoretical lawful maximum use</i> of the existing infrastructure, in line with standard EIA practice. While the NIA reflects this theoretical maximum (approximately 300 movements per day), it is clearly a stylised scenario: it assumes nil wind interference, highly structured flight circuits, and largely consists of touch-and-go operations from light aircraft. These assumptions are necessary to quantify potential environmental envelopes, not to reflect intended operational behaviour. Furthermore, the claim that one runway is “a go-cart track” is incorrect. The runway in question was partially resurfaced by a film production and painted for cinematic purposes; it is not actively used for go-karting or any non-aviation function. It remains legally a runway and is available for lawful aviation use once activated with the SACAA. Scenario 1 is not a fallback plan requiring upgrades or modifications. It simply represents the existing legal rights—a pre-NEMA lawful use—which do not require environmental re-approval. This approach provides a conservative comparison to ensure that impacts of the proposed development are not understated.

		50.32. It is quite clear that besides the three alternatives already mentioned (i) the ‘no go’ = current operating and infrastructure situation; (ii) the preferred Alternative 4 i.e. the expansion of CWA and (iii) a fully operational CWA facility (all 4 runways in operation), there are other alternatives that ought to have been considered. The most obvious is that of a scaled down version of the proposed expansion development of the CWA to implement the mitigation hierarchy appropriately particularly with regard to the issue of noise impacts.	EAP response: The comment on consideration of additional Alternatives has been addressed. Alternatives that were not feasible were not included for assessment, including <i>a scaled down version of the proposed expansion development of the CWA</i>. Response from CWA: The idea that a "scaled-down" version of the CWA should have been considered misunderstands the nature of airport infrastructure planning and the rigorous constraints that limit viable alternatives. A scaled-down alternative that materially alters the airside infrastructure—such as runway length, orientation, or separation distances—would compromise the airport’s technical viability, its ability to attract airline partners, and its compliance with international safety standards. Critically, scaling down does not necessarily reduce noise impacts. Noise exposure is a function of aircraft types, flight paths, operational hours, and terrain—not just the size of a terminal or number of support facilities. A smaller development still requires flight operations, and without sufficient infrastructure, these operations may become less efficient, requiring steeper climbs, longer idling times, or suboptimal routings—ironically increasing noise and emissions. Moreover, the mitigation hierarchy has been applied through design, including a displaced threshold that moves aircraft approach paths farther from sensitive receptors. The predominant use of a southerly wind (SE) means approaches will be from the north—over open agricultural land, not urban development. Lastly, a scaled-down airport would fall short of its economic rationale and functional purpose. It would fail to unlock the regional catalytic benefits identified in the Need & Desirability section and compromise the ability to offer Cape Town a meaningful secondary airport—undermining resilience, competition, and long-term planning objectives.

		50.33. The claim that “CWA must have a fully operational 3.5 km runway from Phase 1 to achieve CWA’s core objectives....” bears scrutiny. One of these objectives is to serve as “a diversion and fuel planning airport for inbound flights to CTIA.” This claim is regarded as being over stated. Put differently, it is not an absolute necessity that CWA cater for all possible aircraft that fly into CTIA (now and in future) to serve as an effective alternate destination airport. Moreover, it would seem improbable that this is the sole rationale for installing a 3.5 km runway.	Response from CWA: The need for a 3.5 km runway from Phase 1 is not overstated—it is a technical and strategic necessity. This length has been determined not arbitrarily, but in line with global airport planning principles that seek to maximize the number of aircraft that can take off and land with the lowest possible weight restrictions, under a variety of environmental and operational conditions. Runways are designed around aircraft performance envelopes. A shorter runway may technically allow operations by widebody aircraft under optimal conditions, but it introduces operational limitations such as: • Reduced fuel or passenger loads (known as weight penalties), • Restrictions during hot or wet conditions, • Inability to accommodate diversions under certain weather or emergency conditions. The 3.5 km length ensures that even fully laden long-haul aircraft (e.g. Boeing 777, A330, A350) can land or take off without payload restrictions, thus making CWA fully compliant with requirements to be designated as an alternate destination airport for inbound CTIA flights. This is critical not only for flight safety and planning but for airline operational efficiency and insurance compliance. While a reduced-length runway could be considered, it would immediately constrain CWA’s role, limiting the range of aircraft it can support and undermining the airport’s attractiveness for commercial operators. It may also jeopardize its ability to serve as a CTIA alternate, which is one of the airport’s foundational objectives. In summary, the 3.5 km runway is not an excessive design—it is a functional, future-proof requirement. It ensures long-term utility, viability, and full operational integration into the region’s airspace planning. It is for this very reason that CTIA is increasing the length of their runway from 3200m to 3500m.

		50.34. The above point is supported by the fact that Lanseria serves as a destination alternate for ORTIA for a range of aircraft, but not all aircraft. Notwithstanding, it fulfils an important function in this regard. This points to the fact that a down-scaled version of the proposed CWA expansion is an alternative that ought to have been identified and subjected to a comparative assessment in the EIA process. Again, the most obvious alternative that has been completely ignored is that of a scaled down version of the proposed expansion development of the CWA to implement the mitigation hierarchy appropriately particularly with regard to the issue of noise impacts.	EAP response: The comment on consideration of additional Alternatives has been addressed. Alternatives that were not feasible were not included for assessment, including <i>a scaled down version of the proposed expansion development of the CWA</i>. Response from CWA: As per 50.33.
		50.35. The emphasis or insistence that the proposed CWA expansion must include a 3.5 km runway in Phase 1 in order to meet the destination alternate requirements for CTIA is questioned. CTIA cannot currently cater for large, wide body aircraft of the size of the Airbus A380 (for example) and will only do so once the planned realigned runway has been constructed. Even when this runway is complete at CTIA, this does not necessarily mean that a destination alternate airport in close proximity will be preferred. The reasons are varied. Flight planners may decide to specify ORTIA because it may be the closer option (for long haul flights which use larger aircraft such as the Airbus A380) when entering South African airspace. Also, if landing at CTIA is not possible due to weather conditions, landing at CWA is also likely to be precluded.	EAP response: The design and proposal for a 3.5km runway is based on technical input and forward planning and includes CTIA's proposed development in future. The case for alternate airport has been technically evaluated and motivated in the amended draft EIAR. The development of flight paths falls outside the EIA process and is a process under SACAA. Response from CWA: Refer to the specialist study done by Munich Airports which analyses diversion aspects fully. The emphasis on a 3.5 km runway in Phase 1 is not solely about qualifying as a destination alternate airport for CTIA. While that is one benefit, the runway length is primarily dictated by aeronautical performance requirements to support a range of aircraft with minimal weight penalties. Reducing the length would impose operational constraints on airlines, affecting their ability to operate efficiently or profitably. Lanseria's role as a destination alternate for ORTIA is acknowledged, but each region's airspace, geography, weather patterns, and aircraft fleet differ. Cape Town's reliance on long-haul international routes—with larger aircraft—

			means its alternate must accommodate such aircraft under wet and hot conditions, fully loaded. The report in <i>Appendix 22 – Alternate Airport Study</i> also confirms that planners prefer destination alternates that avoid congested airspace, reduce fuel carriage, and offer cost efficiencies. While CTIA may not yet accommodate aircraft like the A380, the realignment plans will change that, and CWA’s runway design is forward-looking to support future demand patterns—where Cape Town’s appeal as a direct international destination continues to grow. Furthermore, ORTIA is not always a practical alternate due to its distance and weather divergence. It also doesn’t negate the need for a Western Cape-based alternate. The design of a 3.5 km runway at CWA is not excessive, but a deliberate planning choice to ensure long-term operational flexibility, economic viability, and compliance with international diversion protocols.
		50.36. Examination of the list of aircraft in the NIA shows that none require a 3.5 km runway. Based on freely available technical information it can readily be established that a 3.5 km runway is not needed for the Airbus A330 or for any of the listed models of Boeing aircraft in the NIA as is evidenced below:	EAP response: Detailed responses provided in comments below.
		50.36.1. The Airbus A380, which does require a 3.5 km runway, will fly into CTIA once the new re aligned runway has been constructed. The obvious question that arises from the foregoing information is this: What is the likelihood that CWA is installing a 3.5 km runway for the sole purpose of serving as an alternate destination for every aircraft where CTIA is the original intended destination, including large aircraft such as the Airbus A380?	CWA response: The suggestion that the 3.5 km runway at CWA is being built solely to accommodate the Airbus A380 as a CTIA alternate is not only a mischaracterisation of CWA’s strategic intent, but also technically incorrect. In fact, the Airbus A380 has better runway performance than the Boeing 777-300ER and 777-9. Despite its size, the A380’s four-engine design and wing loading characteristics allow it to take off and land within shorter distances than a fully loaded 777 in many operational conditions. As confirmed by Airbus and independent performance data, the A380’s typical take-off field length is around 3,000 meters, while the 777-300ER often requires around 3,500 meters under hot-and-high or max-weight scenarios.

			CWA's decision to implement a 3,500 m runway is not about designing for the A380, exclusively. It's about ensuring safe, flexible, long-term capability to support a wide range of aircraft—including Code E and Code F types—under real-world operational constraints: degraded weather, wet runways, high payloads and diversion scenarios. It is a decision grounded in technical modelling, long-term demand forecasting and direct consultation with Boeing, who specifically recommended 3,500 meters to maximise 777-family performance and position CWA favourably compared to CTIA's constrained Runway 01/19. This is about future-proofing an international airport to meet regulatory standards and operational demand.
		50.36.2. Related to the above is this question: Does installing a 3.5 km runway for the sole purpose of fulfilling the need for a destination alternate for CTIA for all aircraft make sense from an investment and business case perspective - given that actual use of the airport as a destination alternate does not, on the face of it appear to be a major income generator?	CWA response: As per 50.36.1
		50.36.3. Added to the foregoing ((a) and (b) above): Firstly, actually having to divert to the destination alternate airport identified in a flight plan does not commonly or routinely occur – this is an exceptional event. This would seem to translate into limited landing fees and fuel sale opportunities (for example). Secondly, the fuel savings associated with having a destination alternate that is in close proximity to the actual intended destination airport accrues to the airline companies and not the destination alternate airport.	Response from CWA: The suggestion that alternate diversions are rare overlooks the core aviation principle of <i>fuel and risk planning</i>, not frequency. Even if diversions are infrequent, the requirement to <i>carry fuel to an alternate</i> affects every single flight. A closer alternate like CWA results in tangible fuel savings on every inbound flight, reducing deadweight and emissions. Resulting from its designation as a preferred alternate airport, the value creation stems from three primary sources: 1. Fuel savings on every inbound flight due to reduced alternate distance; 2. Increased cargo uplift opportunities, as reduced deadweight allows aircraft to carry additional revenue-generating payload; and 3. Carbon emissions savings, which are measurable and align with the airlines' ESG commitments.

			Furthermore, the assumption that CWA's 3.5 km runway is being installed solely to serve as a diversion airport for CTIA, and that this function alone must justify the investment, reflects a narrow and flawed view of the airport's business case. CWA is not only being developed as a standby or alternate destination airport. It is a long-term aviation asset designed to serve scheduled domestic and international flights, air cargo, MRO and aerospace industry functions, with the diversion capability forming only one of several strategically important roles. The runway length supports this broader commercial and operational vision, all of which informs the airport's business plan. CWA's runway is being designed for multi-role utilisation, including freight uplift, long-haul passenger service and future aircraft types. It is worth noting that runway length is a one-time decision with 50+ year implications. It is not something that can be easily or economically changed later. Investing in the right infrastructure upfront ensures CWA is fit for purpose and competitive well into the future. In short, the 3.5 km runway is not justified by alternate use alone, but alternate use is one of many high-value roles it enables. The investment is about capacity, flexibility, safety and long-term strategic positioning.
		50.37. It needs to be said that destination alternate insofar as the aviation industry is concerned has a particular meaning: "Destination alternate: An alternate aerodrome to which an aircraft may proceed should it become either impossible or inadvisable to land at the aerodrome of intended landing." This term is applied interchangeably with "alternate destination." The reason why this point is being made is that the amended DEIR uses the term "destination alternate" consistently when discussing the issue of diversion (i.e. the need for aircraft to specify the airport where it would land in the event that landing at the intended destination airport is not possible). There is one exception, where the term "alternate destination" is used and which is not in the context of diversion or needing a substitute airport if landing at the intended destination airport is not possible. In this regard, we note the following:	CWA Response: This typo is noted and shall be corrected in the final EIAR to "<i>destination alternate</i>" from "<i>alternate destination</i>". EAP Response: This correction has been made on page 390 of the EIAR. This is the only place where "<i>alternate destination</i>" was used. The rest of the document refers to "<i>destination alternate</i>".

	50.37.1. “Industry estimates indicate that CWA’s proximity as a diversion alternative could save airlines approximately R1.2 billion per year in fuel, operational, and scheduling costs. CWA has the opportunity to monetize a portion of these savings through strategic agreements with airlines, positioning itself as a preferred alternate destination and securing long-term commercial commitments from international carriers. This revenue stream enhances the airport’s overall financial sustainability...” (emphasis added).62	CWA Response: This comment is noted. As stated above, this typo is noted and shall be corrected in the final EIAR to “<i>destination alternate</i>” from “<i>alternate destination</i>”.
	50.37.2. From careful examination of the wording in this statement it can be seen that it shows that as well as being a destination alternate (to address the potential need for diversion), CWA also plans to serve as an alternative intended destination airport. Furthermore, the statement suggests an intention is that CWA position itself as the preferred intended destination airport and this will be achieved through formal commercial commitments with airlines.	CWA Response: The mention of “alternate destination” is a typo, as already identified above and should read “destination alternate” in the context of facilitating diversions and enabling the savings for the airlines, as is mentioned in the paragraph referenced. However, CWA will also be a preferred destination for direct air services which has been included in CWA’s growth forecasts.
	50.37.3. According to a news article, Mr Nick Ferguson announced that “...the private airport group had signed a 15-year agreement with German airline Lufthansa Group. Ferguson said the airport is set to become a “destination alternate” airport for travellers into Cape Town, rivalling Cape Town International in capacity and accommodating more air traffic.” (emphasis added).	CWA response: The quote cited in the comment originates from an unreferenced media article. As a designation alternate, CWA will serve a complementary function, enhancing CTIA’s role, while delivering financial, operational and environmental benefits with each flight
	50.37.4. The notion that CWA must have a runway that is the equivalent of that at CTIA so that it can serve as a destination alternate cannot be non-negotiable. By this is meant that it cannot logically be claimed that if CWA does not have a 3.5 km runway, airlines would not use it as a destination alternate. The airport could still serve this purpose, but for fewer aircraft types. It does not absolutely have to cater for every type of aircraft that uses CTIA. Lanseria, which serves as a destination alternate to ORTIA is not able to take every aircraft	Response from CWA: The comment acknowledges a core principle in aviation planning—alternate airports need not serve every aircraft type. However, this oversimplifies the commercial and operational rationale for the 3.5 km runway at CWA. Unlike Lanseria, CWA is not only intended to function as a regulatory alternate but to strategically capture and share in the value creation associated with being the preferred alternate—including for wide-body aircraft operating

		type that uses ORTIA, which simply means that another airport would be selected as the destination alternate. For the larger aircraft, such as the Airbus A380, this would be King Shaka Airport in Durban.	high-yield intercontinental routes. The 3.5 km runway ensures optimal payload, fuel flexibility, and reduced diversion penalties, all of which are critical factors for airlines in route planning and alternate designation. This is not just about technical compliance—it is about commercial relevance. A shorter runway would limit the number of aircraft types and operators willing to designate CWA as an alternate or consider it as a secondary base. That, in turn, would diminish the airport's ability to enter into long-term agreements with major carriers—agreements that underwrite the financial feasibility of the infrastructure investment. Hence, the 3.5 km runway is not "non-negotiable" for regulatory reasons; it is strategically required to fulfil CWA's full intended role and secure commitments from a broader base of operators, thereby maximizing regional connectivity and resilience.
		51. In summary: 51.1. The consideration of alternatives is wholly inadequate. It is unreasonable to have neglected to develop an alternative that is more responsive to the concerns of residents and to the fact that residential settlements are growing and will continue to do so into the future. Alternative layouts and development footprints within the site, that may be more responsive to land use compatibility issues have also not been identified and assessed. This includes a scaled down version of the proposed expansion has not been considered and that takes account of future planned residential areas.	EAP response: The comment on Alternatives has been addressed above. No residential development is located inside the Lrdn of 55dBA. One farmhouse to the North is affected, but the landowner does not object. The surrounding area is not developed yet, and integrated urban planning is currently taking place through negotiations between CWA and surrounding landowners. Response from CWA: The suggestion that alternatives have been wholly neglected is incorrect. Over the past several years, CWA has reviewed and refined several layout iterations, including development footprint variations, runway orientation, operational phasing, and land use configurations—each tested against aviation safety, airspace integration, and technical feasibility. The project's current configuration already reflects these refinements, with numerous concessions made to address adjacent land uses. The design accommodates buffer areas, avoids the Koeberg nuclear exclusion zone, and optimizes the site's topography to minimize cut-and-fill. Importantly, a shorter

			runway was modelled, but would have imposed payload and operational penalties, reducing commercial attractiveness and limiting long-haul alternate use viability. While residential expansion is acknowledged, much of the land South of the airport has lapsed planning rights, and any new urban development would need to account for the airport's legally entrenched operations. A scaled-down version of the airport would fail to achieve its strategic aviation and economic objectives and would not materially reduce noise exposure given aircraft operational requirements. Thus, alternatives have not been ignored—they have been explored and refined extensively within real-world constraints. Response from town planner: See 50.23.3. above
		51.2. There is a mismatch in the way the 'no go' alternative or base case has been applied. The NIA uses a different base case to all other components of the EIA process. This is wholly unacceptable. The scenario used as the base case for the NIA must be applied across all environmental issues / specialist studies or the NIA base case must be changed to that which is common to the rest of the EIA. The reasoning provided for using a different base case for the NIA is not acceptable and is rejected with the disdain it deserves.	EAP response: The comment on the No Go Alternative 1 has been addressed above. Response from CWA: The use of Scenario 1 in the NIA as the base case is both deliberate and appropriate. Unlike other specialist studies, which reflect the current operational state, the Noise Impact Assessment must model the full lawful operational potential of the site, consistent with what is permissible under existing infrastructure and aerodrome rights. This includes all four legally constructed and technically usable runways at Cape Winelands Airport, which pre-date NEMA and do not require new environmental approval to operate. This is not a "mismatch" but a precautionary approach—designed to provide I&APs and authorities with a realistic worst-case noise envelope. If the application to expand CWA fails, the airport can still legally escalate operations on the existing footprint. Ignoring this fallback would understate the true

			noise context and create a false impression of the relative impact of the proposed development. The baseline for each discipline is tailored to the nature of that impact. For noise, lawful capacity matters; for air quality or biodiversity, current activities and emissions are the relevant base. Uniform baselines across disciplines are not required by NEMA—instead, appropriate, context-specific baselines must be applied to ensure defensible and accurate assessment. The accusation that the reasoning deserves “disdain” is unwarranted and mischaracterizes a transparent, technically reasoned methodology.
		51.3. The justification for considering only a full-scale expansion option, including the maximum length runway is regarded as being flawed. There are examples of smaller airports serving as effective destination alternatives even where they do not cater for all possible aircraft that land at the intended destination airport. Alternatives along these lines have not been considered.	EAP response: The comment on Alternatives has been addressed above. Response from CWA: The assertion that only a full-scale expansion with a 3.5 km runway has been considered is incorrect. CWA has, over several years, reviewed and refined several layout and scale options, taking into account environmental constraints, airspace, wind patterns, noise impacts, topography, safety zones, and long-term sustainability. A 3.5 km runway is not chosen arbitrarily—it is the result of performance-based planning to accommodate the widest possible mix of aircraft types with the lowest weight restrictions, thus improving safety, operational efficiency, and financial viability. While smaller runways may allow limited aircraft categories, this would exclude many long-haul flights, especially under adverse weather or load conditions, and reduce the airport's ability to serve as a meaningful alternate or primary destination in the region. CWA's goal is not just to be a diversion airport—but to function as a key node in Cape Town's broader aviation network, accommodating scheduled services, general aviation, and alternates. A reduced footprint or shorter runway would restrict this function and render the project non-viable under current and forecasted demand scenarios.

			In contrast to the claim of limited consideration, CWA's selected design is the culmination of a rigorous, iterative planning process informed by real-world constraints and decades of aviation infrastructure planning expertise.
		51.4. The key objective for considering alternatives has not been met, namely that of avoiding adverse impacts. This is one of the most effective ways of giving effect to the mitigation hierarchy, which is, in the first instance, to avoid negative impacts. Minimisation of negative impacts only comes into play where impacts cannot be avoided. Clearly, alternatives are also to consider enhancement of positive impacts.	EAP response: The comment on Alternatives has been addressed above. Response from CWA: While the amended DEIR may present the preferred alternative, it is not a product of arbitrary selection but of an extensive refinement process. The claim that avoidance was ignored is therefore inaccurate—on the contrary, avoidance was a central consideration, followed by reduction, mitigation, and offset where total avoidance was not feasible.
		51.5. The net effect of this means that the information in relation to alternatives is not appropriate or relevant to the decision that is required to be taken by the competent authority.	EAP response: The comment on Alternatives has been addressed above. The information presented in the final EIAR will allow the CA to make a decision. Response from CWA: This statement is incorrect. The information on alternatives presented in the amended DEIR is entirely appropriate and relevant to the competent authority's decision-making. The EIA Regulations require the consideration of reasonable and feasible alternatives, and the CWA team has complied with this obligation. Several layout options have been explored; site location has been thoroughly justified based on land availability, aviation safety, spatial policy alignment, and the absence of viable alternative sites outside the Koeberg exclusion zone. The preferred alternative is the product of multiple refinements—incorporating airspace integration, flat topography, environmental buffers, and infrastructure connectivity.

			The competent authority is therefore presented with a clear, well-motivated, and environmentally informed alternative—fully compliant with regulatory expectations and framed within a defensible application of the mitigation hierarchy. The implication that the authority lacks relevant information is unfounded.
		ENGAGEMENT WITH I&APS TO DATE 52. The number of engagements between Garden Cities and the CWA presents a skewed picture of how the process truly unfolded with mention made of over 100 documented interactions. On what basis is this figure arrived at.	Response from CWA: The figure of over 100 interactions between Garden Cities (GC) and Cape Winelands Airport (CWA) is based on a detailed and systematically compiled record spanning from April 2020 to January 2025. This record documents 100 engagements, including meetings, emails, letters, and phone calls. These are not approximations—they are drawn from internal logs maintained by CWA, each entry noting the date, type of interaction, participants, and discussion focus. Summary of Interactions: • Nature of Engagements: Interactions included strategic meetings, correspondence on land and planning issues, discussions on engineering services, EIA alignment, legal rights, and development phasing. • Participants: Engagement was with GC’s executive team, planning consultants, legal advisors, and on occasion, external stakeholders such as the City of Cape Town. • Initiation: The majority of engagements were initiated by CWA as part of its efforts to ensure alignment and transparency, with numerous engagements also prompted by GC in response to specific proposals or milestones. This robust interaction history provides evidence of sustained and meaningful engagement. The suggestion that the number is inflated or misleading is without foundation. A full summary of these documented engagements is available for reference should DEA&DP require it.

		53. The meetings with CWA representatives to date is persistently that of them requesting an audience to discuss or submit something to Garden Cities and in several of these instances our client has voiced its concerns, frustrations and raised its significant concerns regarding the lack of alternative sites and the types of mitigation measures proposed, the latter of which is always at the expense of Garden Cities, financially and logistically. Aspects such as lack of financial understanding and potential financial impacts, present and future, as well as how CWA calculated these suggested valuations, which was provided at one of these listed e-mailed engagements, was raised with them, accounting for several of the alleged interactions.	Response from CWA: As per 52
		54. The heart of the concern relates to the failure to identify and evaluate an alternative of the proposed expansion of the CWA to implement the mitigation hierarchy appropriately particularly with regard to the issue of noise impacts. This exercise cannot simply be ignored on the basis of that the applicant unilaterally denies and ignores the spatial planning undertaken for all phases of the Greenville Development. The proposed expansion of the CWA will effectively sterilise a significant portion of the impacted landholdings with direct adverse implications for the sustainability of Garden Cities operations as several phases of the development already having been implemented and the investment in bulk infrastructure and services has already been made in respect of all phases of the Greenville Development. It follows that sterilising a significant portion of any phase of the Greenville Development will have significant adverse socio-economic effects, which have not been evaluated or assessed.	EAP response: Alternative identification and assessment formed the basis of the EIA process. The Noise impacts were modelled and assessed and mitigation proposed through the NIA. The alternative land uses proposed for land parcels affected by noise forms part of the proposed mitigation and involves ongoing negotiations between affected parties and CWA. No land will be sterilised, but alternative land uses will be encouraged. Response from CWA: This statement overlooks both the complexity of airport planning and the reality that Garden Cities' rights over large portions of the land—specifically <i>Remainder of Portion 4</i>, measuring 384.42 ha—have lapsed and any further development will require a new EIA process and re-application for rights. CWA cannot “unilaterally ignore” spatial planning—rather, the reality is that planning frameworks must evolve in response to lawful existing uses like CWA, which predates Greenville and whose rights are entrenched. CWA has undertaken extensive engagement and layout analysis (over 100 iterations), including the incorporation of noise mitigation considerations. However, from a technical aviation perspective, runway placement and orientation are driven by wind, topography, and airspace—not by surrounding landownership. It is not feasible to “relocate” a runway to accommodate

			speculative future phases of a neighbouring development, especially when those rights have lapsed. The sterilisation claim is therefore mischaracterised. CWA is not sterilising land—it is acting within its historical, legal, and operational rights. Furthermore, the actual developed portion of Greenville is limited (essentially Fisantekraal), while the remainder remains agricultural. Socio-economic effects, to the extent they exist, are speculative and unquantified, and must be weighed against the considerable regional economic upliftment CWA enables.
	55. Regarding CWA’s suggestion that the full range of potential impacts were scoped during the Scoping Phase and assessed during the EIA Phase: this is simply not correct. From Garden Cities’ perspective, the full socio-economic impact of the significant loss of housing opportunities for the Greenville Development and the manner in which negative noise impacts have been described is entirely one-sided and only reviewed based on what is best for CWA and not Garden Cities or the socio-economic impact on the sustainability of Garden Cities’ operations.	Response from CWA: This claim is unfounded and overlooks key facts. The full range of potential impacts—including socio-economic, land use, and noise—were indeed scoped and assessed in terms of the EIA Regulations and have been revisited and expanded in response to stakeholder input, including that of Garden Cities. Importantly, the bulk of the Greenville Development land south of CWA (Rem. Ptn 4) is not currently developed, and the development rights have lapsed, requiring a new EIA and application process before any further phases can proceed. It is therefore incorrect to claim there is a "significant loss of housing opportunities" when no current legal approvals exist for that development. The current reality is that this land is agricultural, and no land use rights are in place that are being “lost.” EAP response: potential impacts were identified in the Scoping Phase, but only assessed and finalised during the EIA Phase, with the input of IAPs and further specialist studies or technical assessment. Impact assessments on noise and socio-economic were by specialists and are considered credible.	
	56. It should be noted that CWA has continuously denied and ignored the spatial planning implications and impact on the rights obtained by Garden Cities in respect of the Greenville Development which was approved previously by Province and the City of Cape Town, supported by DEA&DP, as well as the	Response from CWA: This statement misrepresents the current legal and planning status of the Greenville Development, particularly with respect to land south of Cape Winelands Airport (CWA). While the original approvals may have envisioned a	

		Department of Mineral Resources and Energy (DMRE) with various agreements, funding structures secured, tri-partite agreements entered into and macro plans underpinned with the then Concept Plan that was approved as part of the overall Greenville Development approval. The Greenville Development approval cannot be neatly compartmentalised into discrete component parts as it represents the culmination of a linear approach to spatial planning for the area which anticipates the full extent and complete scope of the mixed-use development, including a number of proposed housing units and supporting community and public facilities and further business opportunities.	linear spatial planning framework, the development rights on Rem. Portion 4—comprising the bulk of the land south of the airport—have lapsed. This lapse was confirmed in writing by the City of Cape Town, and as such, no enforceable development rights currently exist for that portion of the Greenville Development. CWA has not denied or ignored spatial planning implications; on the contrary, CWA has actively engaged with the historical context of the area, including the need for updated assessments given the time elapsed since initial approvals, changes in policy, and current land use realities. The claim of "continuous denial" disregards extensive correspondence and consultation records between CWA and Garden Cities, including multiple meetings and attempts to explore compatibility between the proposed airport expansion and adjacent land uses. Moreover, the assertion that the Greenville approval “cannot be compartmentalised” contradicts standard development practice. Each phase of a large-scale development like Greenville is typically subject to updated assessments and approvals as circumstances evolve. The linear approval narrative does not override the fact that the land in question currently holds no lawful development rights—a material planning fact that cannot be ignored by any credible environmental or spatial assessment process.
		57. The Greenville Development has been an ongoing project without fail, since its original approval and the only aspect impacting on implementation was the Covid-19 epidemic, which delayed all development projects worldwide. Garden Cities have continuously proven and given effect to the spatial planning approach and Greenville Development through significant investment, ongoing servicing and house construction activities annually without fail. The applicant’s continued efforts to ignore the above concern and the suggestion that the land use rights have lapsed does not address the potential adverse socio-economic impacts. It also does not speak to a true and open engagement with existing landowners and their existing rights in a collaborative approach, as they continuously alleged, as their sole purpose seems to be that of the	EAP response: The IAP was identified as an adjacent landowner in the early stages of the Scoping Phase and included in all communications to IAPs throughout the EIA process. All comments received by the IAP have been recorded in the C&R reports to date and responded to in full. As stated in the previous C&R (Appendix 29C) <i>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</i>

		approval of their project; irrespective of the negative impacts, short, medium and long term.	<i>engagements, WA 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. The claim that there has been limited engagement is contradicted by the record: Since April 7, 2020, coming up for 5 years now there have been in excess of 100 documented interactions.</i> <i>From a noise perspective, the expansion of CWA has no impact on the Phases/Parcels 1-3. Phase/Parcel 4 rights have expired. Phase/Parcels 5-7 are conceptual.</i> <i>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.</i> The Socio-economic IA includes consideration of GC and alignment with future construction phases, assesses the sense of place impact on existing and future GC phases, and assessed the impact on surrounding property values (inclusive of GC and the ongoing Greenville development)., amongst others. Response from CWA: The claim that the Greenville Development has progressed “without fail” is contradicted by formal documentation from the City of Cape Town confirming that the land use rights for <i>Rem. Portion 4</i>—which forms the bulk of the land immediately south of Cape Winelands Airport (CWA)—have lapsed due to inactivity within the legally prescribed timeframe. This is not an interpretation or opinion by CWA but a matter of record in terms of planning law and municipal process. While it is acknowledged that Garden Cities has made substantial investments in portions of Greenville that have been developed (notably west of the Mosselbank River), the fact remains that no development rights currently exist for the land most affected by the proposed airport expansion. Referring to

			lapsed rights as though they are still in force undermines the integrity of the spatial planning and land use management system. CWA has not ignored socio-economic impacts. Rather, it has repeatedly engaged with Garden Cities over several years—documented through dozens of meetings and written exchanges—to explore compatibility and mitigation. These engagements included discussions on phased development, runway orientation, buffer zones, and even land acquisition. It is misleading to suggest that CWA has pursued its application “irrespective of the negative impacts.” Instead, CWA has gone to considerable lengths to structure its planning around phased infrastructure, with staged impacts aligned to forecasted aviation activity levels. Finally, the suggestion that COVID-19 is the sole reason for delays does not exempt a developer from complying with statutory obligations tied to the lifespan of rights and environmental approvals. Many other developers managed to meet these requirements during the same period, and rights holders are expected to act within the framework of the law, regardless of external disruptions.
		Appendix 29C - Comments and Response Report (In-Process EIA Phase) 58. With respect to the response that “the assertion that engagement has only 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”: We note that the persistent rejection and refusal to acknowledge the Greenville Development as a whole (including those future Phases 5 and 6) in terms of the approvals and approved Concept Plan, is not reflective of a process marked by transparency and collaboration, but rather that of continued efforts to disarm and dismiss Garden Cities’ rights.	EAP response: Refer response above. In addition, Appendix 36 acknowledged Greenville and GC, but at the same time states the following: <i>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:</i> <i>“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.”</i> <i>Both the 2018 and 2022 Valuation Roll of the City of Cape Town show the “use category” as being “Agricultural,” in line with the Zoning Extract issued.</i>

			Response from CWA: The assertion that CWA has persistently rejected or refused to acknowledge the Greenville Development in its entirety is inaccurate. CWA has consistently engaged with Garden Cities in good faith and with transparency, including recognition of the parts of the Greenville Development that hold valid approvals. However, it is factually correct—as confirmed by the City of Cape Town’s zoning certificate dated 7 June 2022—that the rights for Rem. Portion 4 have lapsed due to non-implementation within the prescribed time period. Acknowledging this lapse is not an effort to “disarm and dismiss” but to accurately reflect the current legal and planning framework. Any new development on these portions must follow the proper EIA and land use planning processes afresh. CWA cannot be expected to evaluate the future impact of a development that no longer holds valid rights under the applicable legislation.
		59. With respect to the response that CWA’s engagements thus far “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”: We note that the only information from the outset that was requested was that of the Noise Cones and NIA, the latter of which was on several occasions promised to be supplied within a couple of days and/or soonest, only to be furnished with same well into the EIA process as the latest and last report. Again, this does not speak to fostering and developing a relationship of trust and co-operation.	EAP response: The IAP was included in the PPP during the previous round on the draft EIAR, in which the NIA and the noise contours were shared, which was the initial EIAR report (PPP from 13 November up to and inclusive of 13 December 2024) and the amended draft EIAR report (PPP from 19 March up to and inclusive of 13 May 2025). Proof of distribution to the IAP is available to DEA&DP and IAP should it be required. The NIA can only be distributed to IAPs during the Impact Assessment Phase. Response from CWA: The Noise Impact Assessment (NIA) was shared with all Interested and Affected Parties (I&APs), including Garden Cities, at the same time and in accordance with the prescribed environmental review process. CWA was not in possession of the final NIA until shortly before its release in the amended Draft Environmental Impact Report (DEIR). As such, it was not possible to

			provide it earlier or selectively to any stakeholder without compromising procedural fairness and transparency. At no point did CWA withhold information to disadvantage Garden Cities or any other party. The EIA process is governed by clear regulatory protocols that require consistent and simultaneous disclosure to all I&APs. As soon as the final version of the NIA was available, it was made publicly accessible for review and comment. Fostering trust and cooperation requires mutual understanding of the regulatory context, including the fact that draft specialist reports undergo internal revision and integration before they are fit for public release. CWA remains committed to equitable engagement and has adhered to this principle throughout.
		60. With respect to the suggestion that, from a noise perspective, the expansion of CWA has no impact on Phases/Parcels 1-3 or Phase/Parcel 4 (based on CWA's argument that the rights have expired) and Phase/Parcels 5-7 (on the basis that the rights are conceptual) flies in the face of transparency and collaboration. It dismisses the significance of noise impacts on the range of receptors in the area and not only Garden Cities.	Response from CWA: The assertion mischaracterizes CWA's position. The Noise Impact Assessment (NIA) has explicitly assessed impacts on all identified noise-sensitive receptors, including developed areas of Greenville (Parcels 1–3), regardless of whether land use rights are active or lapsed. Our referencing of the current status of rights—such as the lapse of Parcel 4 and conceptual nature of Parcels 5–7—is a factual planning distinction made to contextualize future development potential. It is not intended to negate the potential for impacts, which have been addressed comprehensively in the NIA. In fact, Garden Cities' land was considered a discrete receptor in the NIA modelling. The EIA process obligates us to distinguish between formalized and future developments for accuracy and compliance, but this does not mean the concerns of Garden Cities or other nearby receptors are ignored. On the contrary, all were included in modelling and engagement to ensure informed and balanced impact assessment. This reflects transparency and adherence to due process—not a dismissal of significance.

		61. With respect to the continued assertion that the Greenville Development rights have lapsed: We note that the Concept Plan, approved by the City, contains detailed rezoning and subdivision that will be submitted. To date, the rezoning and subdivision applications and development thus far has perfectly aligned with the Concept Plan, with the Concept Plan being implemented and utilised in the same manner as a MSDF and District Spatial Development Framework (DSDF) which will guide all further development of the Greenville Development. The Concept Plan cannot be brushed aside as 'lapsed', which seems to be CWA's core approach towards Garden Cities and the Greenville Development. The CWA's portrayal of development rights is myopic and fails to address the socio-economic adverse impacts on Garden Cities and the Greenville Development. The response is a simplistic layperson's summation of what is a much more complicated urban design and spatial planning implementation project spanning many years, specifically the roll-out of a new township development encompassing 16,000 houses and various community, public, educational, light industrial and other land uses. A scale of development that effectively depicts a whole new suburb/town. The socio-economic impacts of undermining the sustainability of this broader development initiative have not been envaulted or assessed.	Response from CWA: CWA's reference to the lapse of rights is not an arbitrary or self-serving claim—it is based on a formal zoning certificate issued by the City of Cape Town on 7 June 2022, which confirms that the rights over Erf 4 lapsed due to the failure to submit a subdivision application within the required 5-year period. This is a planning law consequence, not a position manufactured by CWA. Furthermore, while the original Concept Plan from 2012 has provided a high-level framework, it has not been formally updated in over a decade despite significant changes in the spatial landscape, including the emergence of CWA and regional infrastructure shifts. As such, referencing it as if it were a binding and current planning instrument akin to an MSDF or DSDF is misplaced. A Concept Plan does not in itself confer land use rights; those must be sustained through formal applications, approvals, and adherence to statutory timeframes. Importantly, the NIA and broader EIA process did not "brush aside" the socio-economic footprint of the Greenville Development. The impacts were assessed relative to existing legal rights, actual development progress, and planning instruments in effect. The assessment distinguishes between approved, implemented, lapsed, and conceptual phases precisely to ensure clarity and compliance—not to diminish the scale or complexity of the Greenville initiative. However, any credible impact assessment must be based on what is formally in place, not future intentions unsupported by valid approvals. CWA remains committed to transparency and has engaged repeatedly with Garden Cities to understand the broader intent of their development. However, regulatory compliance demands the use of current, valid planning data rather than assuming continuity where legal standing has expired. EAP response: The GC and Greenville concept plan has been acknowledged and assessed in terms of impacts in relevant specialist reports (Socio-economic IA, Noise IA, AQ,IA, Visual IA) and in terms of land use planning in the Land Use Planning

			technical report. This despite the land use rights being lapsed as pointed out by CoCT.
		62. With respect to the response that describes Greenville Development as “a dormitory establishment”: We vehemently disagree with this view of the Greenville Development. The Greenville Development includes businesses, industrial, community, educational, public amenities, housing, etc. The Greenville Development therefore caters for all spheres of urban design and development. This response, however, reinforces the inherent bias in favour of the proposed CWA development as the only socio-economic saviour to the area, whilst diminishing the Greenville Development project to a dormitory establishment. It makes no mention of the myriad socio-economic positive effects associated with a multi-use urban development of this nature which caters for a range of different land uses in accordance with accepted urban design and spatial planning principles.	Response from CWA: The reference to Greenville as a "dormitory establishment" was not intended to diminish its broader mixed-use vision but rather to reflect the current socio-economic reality on the ground, particularly the extremely high levels of unemployment in the Fisantekraal area. According to both local observations and statistical data, unemployment in Fisantekraal is among the highest in Cape Town, and this presents a profound challenge that Greenville alone has not yet been able to reverse, despite its multi-use zoning. While the Concept Plan for Greenville includes a variety of land uses—residential, educational, industrial, and community—the pace and scale of non-residential development have not kept up with residential roll-out. In practice, this means that Greenville is currently functioning primarily as a residential area with most residents needing to seek work elsewhere. This imbalance between where people live and where they can work underscores the urgent need for large-scale, job-generating projects like CWA, which is designed to diversify the regional economy beyond just housing. Rather than being in competition, the Greenville Development and CWA should be seen as complementary efforts to address entrenched socio-economic deprivation. The airport offers a different scale and type of economic opportunity—industrial, logistics, aviation, services—that could help anchor the employment base for communities like Fisantekraal. Recognizing the severity of the unemployment crisis in this area is essential to crafting an integrated development response, not to downplay Greenville's importance, but to highlight why a broader economic catalyst like CWA is necessary.
		63. Again, the response that “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	Response from CWA:

		a broader economic framework, enabling the creation of local jobs, fostering entrepreneurship, and reducing the dependency on external job markets” is one-dimensional, developer-biased and creates a distorted picture of what the Greenville Development will offer the area through the multifaceted urban design. Furthermore, the expectation that an existing development with an approved Concept Plan and continuous roll-out is expected to simply stop and alter its course to align with the CWA’s goals is inherently biased and presents CWA’s plans as fait accompli.	The statement that “Greenville must align with CWA to avoid becoming a dormitory suburb” does not suggest that Greenville should abandon its approved Concept Plan or halt its development. Rather, it acknowledges a pragmatic reality: without sufficient economic drivers nearby, the sustainability of any large-scale residential development—including Greenville—is at risk. Cape Winelands Airport (CWA) does not seek to override or dictate the trajectory of Greenville’s development. On the contrary, it presents a once-in-a-generation opportunity to anchor Greenville within a functional economic node, reducing commuter dependency and creating diverse job opportunities, especially critical in an area where unemployment rates are alarmingly high. CWA’s development does not render Greenville’s planning redundant—it enhances its prospects. The airport introduces industrial, logistics, aviation-related services, and other commercial opportunities that are otherwise absent in the area. The complementarity between a regional employment engine like CWA and a growing residential hub like Greenville is exactly the kind of mixed-use integration the MSDF and national urban development principles promote. To frame this relationship as “one-dimensional” or “developer-biased” misses the broader intent: collaborative urban integration, not subordination. The CWA project does not present itself as fait accompli, but rather as a catalyst to reinforce the economic and spatial logic underpinning Greenville’s long-term success. EAP response: The EIA process initiated in 2022 has included this IAP from the outset and has recorded the comments received and provided responses through the C&R throughout the process. The development of Alternatives, the impact assessment and the mitigation proposed has been in consultation with and with input from IAPs from the outset. This consultative process is still ongoing. The development of and assessment of alternatives has followed the NEMA process and reacted to stakeholder input on various aspects (Biosecurity,

			noise mitigation, visual mitigation, groundwater management, terrestrial and freshwater offsets, amongst others).
		64. With respect to the response 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”: We express concern for the persistent view that Garden Cities must adjust to suit CWA despite the detrimental financial implications that further impact the housing costs of an entry housing market, as well as land use planning and environmental implications. Our client is once against forcing lower-income housing individuals to be locked into industrial land zoning and uses as a direct result of the CWA.	Response from CWA: This assertion misrepresents both the intent and planning approach of the Cape Winelands Airport (CWA) development. CWA does not require Garden Cities to "adjust" its entire development to suit airport operations. Rather, it acknowledges that adjustments in respect of use—specifically in the area directly south of the runway—may be required, in line with best practices for land use compatibility around airports. Garden Cities applied for and were granted historically approx. 700,000m2 of bulk around business and industrial use and these could be used in this area. These changes are relatively limited, precautionary, and consistent with existing planning and environmental guidelines, including those adopted by the City and Province. Importantly, CWA does not "force" any party to rezone or shift to industrial use. Any such proposition would require normal due process under planning law and be subject to City approval. If there are opportunities to shift more sensitive land uses (like low-income residential) further from the runway, while still meeting the Greenville Development’s goals, these should be explored collaboratively—not dismissed reflexively. This is not a forced substitution of housing with industrial use, but a potential rebalancing of land uses within the same development, driven by environmental constraints such as noise exposure. Lastly, equating such planning adjustments with an attack on lower-income communities is not only inflammatory but ignores the broader public interest. Ensuring that housing—particularly entry-level housing—is not exposed to high levels of noise pollution is an environmental justice concern. CWA is not undermining Greenville’s objectives; it is inviting sensible integration to ensure the long-term well-being of future residents and the operational integrity of the airport.

			EAP response: The amendment to land use planning for adjacent land use parcels affected as identified by the Noise IA, is a proposed mitigation measure.
		65. With respect to the assertion that CWA and the Greenville Development can coexist, we note that the CWA effectively landlocks residential areas into industrially zoned sites, which renders significant portions of Garden Cities' landholdings sterile to residential and possible educational and community zoned sites, at the expense of Garden Cities and the Greenville Community. CWA's position persistently ignores the incompatibility of the opposing land uses namely airport expansion (industrial) and the Greenville Development (residential, communal, educational).	Response from CWA: The claim that CWA "landlocks" residential areas or sterilizes land zoned for education and community use is not substantiated by spatial planning evidence. The proposed CWA expansion is being planned in accordance with established land use compatibility principles, which prioritize public safety and environmental protection, including the appropriate placement of sensitive uses like housing and schools relative to high-noise or high-activity areas such as airport runways. Importantly, CWA is not proposing to rezone or restrict Garden Cities' landholdings—nor does it have the authority to do so. What it has highlighted is that certain portions of land, particularly those directly adjacent to the runway, may require reconsideration in terms of the specific land uses proposed, to avoid placing vulnerable communities in harm's way, particularly in high-noise exposure zones. Furthermore, it is incorrect to characterize CWA as "industrial" in a conventional sense. While aviation activity shares some characteristics with industrial zoning, it is a distinct land use with specific regulatory and operational requirements. Airports globally are integrated into mixed-use urban fabrics through proper buffers, compatible land use planning, and environmental controls. That is what is being proposed here—not an exclusionary or antagonistic planning approach. The coexistence of CWA and the Greenville Development is not only possible—it is already under discussion. Garden Cities' own servicing and construction timelines have already required phased adjustments to its Concept Plan over time. A collaborative approach remains the best path forward, where both projects can evolve to serve the broader public good—economically, environmentally, and socially—without prematurely dismissing compatibility based on outdated assumptions.

		66. With respect to the dismissive response regarding the exploration of alternatives that presents the chosen location as a fait accompli due to the location being “an existing airport with existing rights”: This is not an existing airport, but is an airfield that has fallen into disrepair with none of the infrastructure providing any substantive reason as to why the land is critical to being host to Cape Town’s second airport.	Response from CWA: This statement is incorrect and misleading. Cape Winelands Airport (CWA), formerly Fisantekraal Airfield, is a legally recognised and continuously operational airport with valid licensing from the South African Civil Aviation Authority (SACAA). The infrastructure includes four intersecting runways, all of which remain legally usable, with two primary runways in regular use and the others maintained for crosswind operations and circuit training. The site has hosted general aviation activities for decades, including flight schools, private charters, and historically, the founding operations of the Stellenbosch Flying Club. The claim that there is “none of the infrastructure providing substantive reason” fails to understand the unique and irreplaceable strategic attributes of the site, which make it ideal for development as Cape Town’s second airport: • It is one of the only sites in the province with flat, amalgamated land exceeding 4.5km, capable of accommodating a 3.5km runway. • It is outside the Koeberg nuclear exclusion zone, clear of mountainous obstacles, and well positioned for airspace integration. • It is away from dense urban development, but close enough to Cape Town to be accessible and viable. • It has historical use rights predating NEMA, which means its lawful aviation use is entrenched and does not require a fresh start under environmental law. • It is already embedded in the Western Cape's aviation fabric, with existing rights and a footprint In short, CWA is not a greenfield proposal—it is a brownfield upgrade of an existing airport platform, precisely the kind of responsible spatial planning envisaged under sustainable infrastructure development principles. To dismiss the site on superficial visual impressions ignores the depth of its legal status,

			technical suitability, environmental alignment, and strategic value to regional aviation. EAP response: The existing CWA site is an existing airport with existing operational rights. This formed the basis of the No Go Alternative. The EIA process initiated in 2022 has included this IAP from the outset and has recorded the comments received and provided responses through the C&R throughout the process. The development of Alternatives, the impact assessment and the mitigation proposed has been in consultation with and with input from IAPs from the outset. This consultative process is still ongoing. The development of and assessment of alternatives has followed the NEMA process and reacted to stakeholder input on various aspects (Biosecurity, noise mitigation, visual mitigation, groundwater management, terrestrial and freshwater offsets, amongst others).
		67. With respect to the various conditions that the CWA site must meet, we note the following: The site is not sufficiently distant from existing developed areas to avoid undue disruption, and this is only the viewpoint of the developer due to the persistent refusal to acknowledge the Greenville Development as a whole (those phases developed and those yet-to-be-developed). The location does encroach on ecologically sensitive zones, as evident in the various offsets required due to the loss of core biodiversity areas and wetlands.	EAP response: The impacts associated with the proposed location and site layout are assessed in the various specialist reports. The mitigation proposed due to Botanical and Freshwater unavoidable losses resulted in offset (Terrestrial and Freshwater). This is the resultant outcome after the mitigation hierarchy was applied, and no avoidance was possible. There are no conditions the site must meet in terms of NEMA – the impacts of the proposed expansion of the existing airport are identified and assessed in the EIA process, leading to development of mitigation. Response from CWA: This misrepresents both the facts on the ground and the rigorous multi-criteria site selection process that underpins the development of CWA. Firstly, CWA is located on the periphery of urban development—a best-practice principle in global airport planning. The site is 2.5 km from the

			nearest edge of Fisantekraal, and 2.7 km from Mikpunt, both of which are well outside the 65 dB(A) noise contour, and in line with acceptable urban noise exposure thresholds. While certain parts of the Greenville Development lie to the south of the airport, it is important to note that the majority of those landholdings are still agricultural in use and Garden Cities’ own rights in respect of these phases have lapsed, as confirmed by the City of Cape Town. Secondly, the claim of “persistent refusal to acknowledge the Greenville Development as a whole” is unsubstantiated. CWA has acknowledged the conceptual intent of the Greenville Development but is also obliged to rely on valid, current planning rights and not conceptual layouts that have not been translated into legally enforceable approvals. Development phasing matters. The EIA considers receptors as they exist today and distinguishes clearly between legally approved phases and future aspirations still subject to regulatory processes. Thirdly, regarding the ecological concerns: the EIA explicitly identifies areas of sensitivity, including Core Biodiversity Areas and wetlands, and proposes formal offsets and mitigation strategies in line with provincial environmental guidelines. This does not reflect a flaw in the site selection—it reflects responsible and transparent environmental planning. All large infrastructure projects involve trade-offs, and the fact that CWA has proactively engaged in offset and stewardship processes is evidence of its commitment to net biodiversity gain, not of site unsuitability. CWA is sure that Garden Cities Greenville Development would have had offsets itself. In summary, the site: 1. Is not in close proximity to dense urban receptors. 2. Lies outside the Koeberg nuclear exclusion zone. 3. Satisfies airspace, topography, and engineering criteria. 4. Has legally entrenched aviation rights. 5. Is undergoing full environmental assessment including mitigation, not avoidance. To reject the site on the basis of speculative, future land use scenarios and known biodiversity trade-offs (which are already addressed in the EIA) is to

			ignore both planning realism and the structured mitigation hierarchy set out in NEMA.
		68. With respect to the response that “when Garden Cities refers to ‘phases’, they are referring to specific parcels of land planned for future development”: This is simply not the case, as Phase 6 merely depicts that Garden Cities have updated phasing to align with development needs and municipal and logistic requirements.	Response from CWA: Noted
		69. With respect to the response that “water supply to the site is from multiple sources which includes both borehole and municipal supply”: We note that the question regarding boreholes has not been answered. 75% of water for the CWA will affect surrounding residential areas, including the Greenville Development.	EAP response: The water provision strategy on site has been developed further with detail provided in the amended draft EIAR. The site is developing potable water supply from boreholes on site and aims to treat to potable standard and supply its potable needs in the short to medium term. Potable supply from CoCT will be added in the medium to long term. The non-potable needs will be supplied by treated sewage water. This approach allows for minimised abstraction from boreholes and increased drought resilience in the short to medium term. Landscaping on site will be water resilient and include pathways and open areas to minimise the need for irrigation. The site will also implement water-saving technologies, such as rainwater harvesting, reuse of treated water, efficient irrigation systems, drought resistant landscaping, low use flushing systems and taps, to minimize water consumption and promote responsible water use
		70. With respect to the response that “The site was specifically chosen by the South African Air Force in 1943 due to its relatively flat topography”: We request the provision of a terrain model depicting the extent of the earthworks that will have to be undertaken.	Response from CWA: The site was indeed selected by the South African Air Force in 1943 for its favourable topography. While some earthworks are required—as is standard for any major infrastructure project—the overall flatness of the site remains a key advantage. EAP response: development of a terrain model indicating the earthworks will follow on the issue of an EA. The anticipated impacts of the activity have been

			assessed by the various specialists and mitigation has been incorporated in the EMPr for the Construction Phase.
		71. Extraordinarily the applicant argues that Garden Cities goal of delivering over 14,000 units is ambitious, and that has not been achieved is a cheap shot and does not thing to advance the evaluation required in terms of the EIA Regulations. The delivery performance summarised is factually incorrect, with the commencement date of construction not aligning with the approval date, as the first construction phase could only commence once the first servicing phase was completed. The calculations used by CWA are manipulative and also do not account for Covid-19 epidemic and the ripple effect it had to the construction industry. Strikes and other unforeseen concerns outside Garden Cities’ control is also not accounted for. If proper account is taken for these factors the so-called delivery performance calculations used by CWA would change considerably. In addition, there is no accounting provision for the bulk infrastructure and associated investments that had to be implemented to unlock various land portions.	Response from CWA: CWA’s reference to Garden Cities’ housing delivery is not intended as a critique of ambition, but to illustrate the realistic pace of implementation for context in forward planning. However, the comment rightly highlights that construction could only begin once initial servicing was complete, and the impact of Covid-19, industry-wide delays, strikes, and external dependencies are all legitimate factors that influence delivery timelines. CWA acknowledges that bulk infrastructure roll-out and upfront investment are substantial and critical in unlocking housing phases. The point being made is not to diminish these efforts but to inform long-term spatial integration and infrastructure coordination, particularly where overlapping land uses and timelines intersect. This context is crucial in evaluating realistic development trajectories and ensuring alignment between aviation infrastructure and adjacent land uses.
		72. With respect to the assertion that noise management strategies will continue to be refined during the EIA process to ensure compatibility with local development and the wellbeing of residents: We note that this statement is woefully incorrect. Furthermore, the development of noise strategies is not something that can be refined or developed once the project has been implemented, as this flies in the face of proactive environmental management envisaged by NEMA and the EIA Regulations. The full nature and extent of noise impact needs to be understood to determine whether it is acceptable, or not to the impacted community. We submit that it is not.	EAP response: Mitigation for noise impacts are included in the Noise IA. In addition, the NIA allows for the further development and refinement of these measures based on consultation with various stakeholders and taking into account the safety and security requirements that the airport must adhere to. The Noise IA further suggests measures such as compatible land use planning, providing incentives for airlines to obtain aircraft with the latest available noise reduction technology, considering the use of specific take-off or approach procedures, using noise preferential routes to assist aircraft in avoiding noise-sensitive areas, considering approaches at slightly steeper angles, considering noise-related operating restrictions for night-time, consultation with affected land public, and possible passive mitigation measures.

		73. With respect to the argument that the scale, scope, and nature of the CWA development are aligned with regional spatial planning frameworks, including the MSDF): This fails to acknowledge that this is only a very recent situation. This clearly was not the case with the previous two MSDFs approved by the City, and the MSDF appears to have been adjusted solely on the basis of the proposed CWA expansion. What were the motivations that underpinned the recent fundamental deviation from the previous MSDFs. This is keeping in mind that the entire spatial planning process regarding the Greenville Development was based on alignment with applicable MSDFs. The years of spatial planning recognition of the Greenville Development including the approval of the Concept Plan similarly underscored the alignment of Greenville with the broader spatial planning vision for the area in terms of applicable spatial planning policies. It is self-serving for CWA to claim that it has a monopoly on balanced and sustainable development. The significant adverse socio-economic and noise impacts the project will have on the sustainability of the Greenville Development and Garden Cities' has not been accounted for and thus the comparison in compatibility between the two alternative land uses in terms of spatial planning is unfair and skewed. The Greenville Development plays a critical role in supporting key needs, which come under direct threat by the CWA.	Response from town planner: There are good statutory reasons why MSDFs must be reviewed every 5 years – circumstances change. This is neither the only, nor the most significant change in the MSDF. Many communities have already expressed concern over major density increases introduced in past MSDF reviews. The City is fast growing and the MSDF must also adapt to remain relevant. In response to this I&AP questioning the City's motivations for "the recent fundamental deviation from the previous MSDFs," attention is drawn to the following: The 2012 Northern District Plan erroneously stated that "Fisantekraal airfield: 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. As a result, the 2012 MSDF envisaged that all general aviation from Fisantekraal and other general aviation sites in the greater Cape Town metropolitan area would be relocated. The land-use rights for the Fisantekraal Airfield never lapsed because it was a lawful use which continued uninterruptedly since 1943. The evidence for compliance with the requirements of and "existing use right" was overwhelming and the City determined in 2020 that, in terms of Section 37(8) of the MPBL, an "Airport" as defined in the Development Management Scheme is a lawful non-conforming use in respect of Portion 4 of Farm 474 Joostenbergs Kloof and Portion 10 of Farm 724 Joostenbergs Vlake. In 2012, DEADP approved the rezoning and subdivision of Greenville including Extension 4 directly south of CWA. Presumably all parties to that process, including the City, operated under the assumption that the land use rights for Fisantekraal Airfield had lapsed. Had it been known to all the parties that a lawful non-conforming use existed, one can assume that at least some conditions would have been imposed to protect the existing Airfield as well as the future residential development. Likewise, if the current EIA triggers existed at the time, the airfield would have been a major consideration in the EA.

			The 2018-2023 MSDF did not take a firm position regarding Fisantekraal airfield and finally abandoned the notion of a possible future airport south of Atlantis suggested in earlier SDFs many years ago. The 2018-2023 MSDF makes the following references to Fisantekraal Airfield [accents in bold added]: 2.4.6 Existing transport network: Air - Cape Town International Airport is an international hub which served more than 9.7 million passengers in 2015. Other airfields such as Ysterplaat Aerodrome and Fisantekraal Airfield are used for activities such a flight training (Cape Town Flight Training Centre, 2017). In 2021, the City dismissed an appeal by Gardens City after approving the rezoning of Portion 4 of Farm 474 and Portion 10 of Farm 724 from Agricultural Zone to Transport Zone 1 with consent for "Airport. In 2022, the rezoning of Erf 4 Greenville (directly south of CWA) lapsed as the rights granted for Erf 4 were not exercised within the prescribed time period. From the above, it is clear that the changes in the MSDF were neither sudden, nor random, but were based on changed circumstances and corrected facts.
		CONCLUSION 74. The definition of an EIA, according to the United Nations Environment Programme, is "a tool used to identify the environmental, social and economic impacts of a project prior to decision making. It aims to predict environmental impacts at an early stage in project planning and design, find ways and means to reduce adverse impacts, shape projects to suit the local environment and present the predictions and options to decision-makers".	EAP response: The comment is noted
		75. Sustainability-led EIA has developed through the broadening of the role of EIA to include considerations of sustainability principals and policy frameworks. This is evident in the international and South African legislative approach to EIAs. EIA has therefore become concerned with more than project-level environmental impact information for decision-making purposes, but requires consideration of the nature of environmental impacts and their significance within the context of sustainability principles, policies, strategies and plans that	EAP response: The comment is noted. The amended draft EIAR considers policy, legislation, strategies, planning tools in light of the proposed project and assesses the impacts related to the Preferred Alternative 4. The amended draft EIAR thus complies to the legislative requirements of the EIA process and content requirements.

		reflect the desired state of the environment. This has not been achieved in the EIA process for the proposed CWA expansion project.	
		76. A sustainability-led EIA approach is required in order to align with the objectives and principles of NEMA, the preamble of which stating that “sustainable development requires the integration of social, economic and environmental factors in the planning, implementation and evaluation of decisions to ensure that development serves present and future generations”. Sustainability principles are further included in section 2 of NEMA and encompassed in the objectives of Integrated Environmental Management in Chapter 5, under which the EIA Regulations are promulgated.	EAP response: The comment on sustainability within the context of the proposed project has been addressed above.
		77. A comprehensive, scientifically rigorous, participative process must be followed in an independent manner. An independent process is one that is impartial and neutral insofar as the interests of the developer are concerned. An EIA is the vehicle through which the sensitivity of the environment is expressed and, if this is not done with due care, there is a risk of irreversible loss of precious resources and irreversible damage to life-support systems, among others, with severe consequences for human communities.	EAP response: The comment on the process to date, the independence of it, and the content has been addressed above.
		78. The EIA process serves as a means for interested parties, local communities, non-profit organisations, research organisations, relevant authorities etc. to express their concerns, and share their local knowledge. The value of this should never be discounted and in fact, it is to the advantage of the EIA process to actively seek these inputs, and to show awareness of and sensitivity to social conditions and needs.	EAP response: The comment is acknowledged and has been rigorously implemented for this project, with extensive engagement and public participation.
		79. Various issues need to be considered, evaluated and accurately recorded in order for the decision maker to be provided with adequate information for decision-making purposes. A significant responsibility therefore falls on the shoulders of the professionals involved in conducting EIAs to ensure that sufficient accurate and scientifically sound information is provided and is assessed on the basis of a precautionary approach, especially where information is limited. EIA is not intended to be a mechanistic and tick-box exercise or to involve providing information that is not relevant to the issue at	EAP comment: This comment on process and independence of the EAP has been addressed. The IAP has not pointed out information provided that is not relevant to the issue at hand.

		hand, as has been pointed out in several instances in the case of the amended DEIR.	
		80. A key consideration is whether the project is aligned with the desired future state of the area. As well as what trade-offs the project must involve in the sense of who or what stands to gain and who or what stands to lose. The EIA process for the proposed development has not addressed this question at all.	EAP response: The consideration of the proposed project within the spatial land use context is provided in the amended draft EIAR.
		81. The proposed development as envisaged by the 'preferred alternative' is not aligned with various policies, plans and/or strategies. In fact, the issue of alternatives has been addressed in a skewed manner, focusing on policies, strategies and plans that have some element that may be used, no matter how obscurely, to demonstrate alignment, without affording the same level of attention to policies, plans and strategies that show the contrary (i.e. no alignment evident). As a result, the EIA process has been focused on finding a rationale for not meeting the applicable policy objectives and on motivating the proposed project, which runs counter to the objectives and purpose of environmental impact assessment, particularly in the context of the shift in focus from merely assessing impacts to a sustainability led impact assessment approach. It also runs counter to the NEMA principles in section 2 and the objectives of Integrated Environmental Management in section 23 of NEMA.	EAP response: The comment on Alternatives has been addressed. The consideration of the proposed project within the spatial land use context is provided in the amended draft EIAR.

		82. Sustainability-led environmental impact assessments means that the adequacy of an EIA process is not only to be judged on whether all of the legally required steps in the process have been fulfilled. It is also to be judged on whether it has addressed the question of the sustainable development context, as reflected in policies, plans and strategies. There are numerous weaknesses and shortcomings in the amended DEIR including information gaps, incomplete and/or missing information, gaps in the identification of impacts, inaccurate and cursory treatment of environmental sensitivities, poor application of the mitigation hierarchy, to mention a few. Suffice to say that the amended DEIR has been found wanting, as detailed in these comments, and is regarded as inadequate for decision-making purposes	EAP response: The IAP is not specific on the statement of <i>information gaps, incomplete and/or missing information, gaps in the identification of impacts, inaccurate and cursory treatment of environmental sensitivities, poor application of the mitigation hierarchy, to mention a few</i> so the EAP cannot speculate to what is being referred to and is unable to answer such a broad statement. Specific comments on perceived shortcomings in the EIAR have been addressed above. The amended draft EIAR is inclusive of legislative requirements and IAP, technical, specialist and stakeholder input, and allows the CA a strong position for decision making.
		ANNEXURE A: Morris Environmental and Groundwater Alliances (MEGA) Review dated May 2025.	-
		Preamble – setting the scene Impact Assessment (EIA) emerged as in the 1960s as a tool to identify and assess the environmental consequences of proposed developments prior to implementation. Moreover, EIA is aimed at the systematic identification, evaluation and analysis of impacts in order to inform decision-making. The United Nations Environment Programme (UNEP) defines EIA as “a tool used to identify the environmental, social and economic impacts of a project prior to decision-making. It aims to predict environmental impacts at an early stage in project planning and design, find ways and means to reduce adverse impacts, shape projects to suit the local environment and present the predictions and options to decision-makers.”¹	EAP response: the comment is noted.
		There is little doubt that EIA is seen as an essential tool in sustainable development. Principle 17 of the Rio Declaration states: “Environmental impact assessment, as a national instrument, shall be undertaken for proposed activities that are likely to have a significant adverse impact on the environment and are subject to a decision of a competent national authority.” Similarly, Article 14 of the Convention on Biological Diversity, also establishes the necessity for EIA where proposed projects	EAP response: the comment is noted.

		are likely to have significant adverse effects on biological diversity. As a result, the focus of EIA has shifted to being sustainability-led process. This is true internationally and is also clearly evident in South African legislation. Thus, EIA is not just concerned with providing project-level environmental impact information for decision-making purposes. It also concerned with consideration of the proposed development within the context of sustainability principles, policies, plans and strategies – which is in fact even more important from a decision-making perspective, since it is aimed at addressing questions of whether development is moving in the desired direction (i.e. towards sustainability objectives or not).	
		A sustainability-led EIA approach is required in order to align with the objectives and principles of the National Environmental Management Act (Act 107 of 1998) – NEMA. The preamble of NEMA states that “sustainable development requires the integration of social, economic and environmental factors in the planning, implementation and evaluation of decisions to ensure that development serves present and future generations.” Furthermore, sustainability principles are included in the Act (section 2) and encompassed into the objectives of Integrated Environmental Management in Chapter 5, under which the EIA Regulations are promulgated. Measurement of impact significance should take place in terms of the contribution towards the achievement of relevant sustainability objectives and gives effect to sustainability principles.	EAP response: the comment is noted.
		A comprehensive, scientifically rigorous, participative process must be followed, which is undertaken in an independent manner. A process that is independent envisages one that is impartial / objective, that is scientifically thorough and unbiased and is neutral insofar as the interests of the developer. All of the above means that a significant responsibility falls on the shoulders of the professionals involved in conducting EIAs to ensure that sufficient accurate and scientifically sound information is available for decision-making purposes.	EAP response: the comment is noted.
		The purpose of this preamble is to set the context for the criteria that are used to test whether an EIA has achieved its purpose, that is whether it has thoroughly identified and assessed the impacts of the proposed development and whether information is suitable for decision-making purposes.	EAP response: the comment is noted.
		1. Scope of this review	EAP response:

		Morris Environmental & Groundwater Alliances (MEGA) was requested by Richard Summers Inc to comment on the Draft Environmental Impact Assessment Report (Draft EIAR) for the proposed expansion of the Cape Winelands Airport (CWA). PHS Consultancy was appointed as the EAP (Environmental Assessment Practitioner) to undertake the Basic Assessment (BA) process for the proposed project. Throughout this report, any reference to the EAP is also to be read as meaning PHS Consultancy. A limited review of the Draft EIA Report prepared by PHS Consulting and dated March 2025 is presented in this document. This means that the review is based on a selection of key factors that serve as indicators of whether the EIA process has fulfilled the intended objectives of such a process. These key indicators are: 1. Need and desirability: the criteria that have been used to assess this aspect of the Draft EIA Report are (i) whether the issues in the relevant guideline have been addressed; in terms of whether the intention. 2. Alternatives: the criteria that have been used to assess this aspect of the Draft EIA Report are (i) how alternatives were identified; (ii) the rationale for rejecting an alternative; (iii) whether alternatives have been comparatively assessed to an adequate level; (iv) how the preferred alternative was derived and the extent to which it is responsive to environmental constraints. 3. Impact assessment approach (identification of impacts, significance rating methodology, mitigation measures) with particular focus on noise.	It is assumed that MEGA commented on the <u>amended</u> draft EIAR and not the draft EIAR, as the draft EIAR is not applicable to this round of PPP. Please note the EAP is PHS <u>Consulting</u>, and not PHS <u>Consultancy</u>. Also note that a <u>Scoping and Environmental Impact Assessment process</u> was followed and not a <u>Basic Assessment</u>. The EAP notes the limited review and the selection of key factors, namely 1) Need and Desirability, 2) Alternatives, and 3) Impact Assessment approach. Note there is an omission of text at the end of point 1, which makes the trial of thought difficult to follow. Please note that the review of Alternatives was conducted on the amended draft EIAR, and not the Scoping report, which would not allow MEGA to assess the process followed to develop alternatives. Further Alternative development was in the draft EIAR and amended draft EIAR.
		This review is limited to specific key aspects of an EIA process that can be regarded as indicators of whether the legal requirements and intended objectives of the process have been met and whether a comprehensive, independent and scientifically solid process has been followed. The methodology that has been adopted in this review is based on a sampling approach. This means that factual evidence for a comment / finding about the Draft EIAR is given, based on particular examples or instances where these are evident. The examples or instances described in this report are not to be taken as being the only evidence of a particular shortcoming. This means that where a shortcoming, inadequacy or gap is noted, it is seen as a symptom of an inadequacy in the EIA process in an area that is critically important for achieving the purpose of an environmental impact assessment; they	EAP response: The approach and comment are noted. Note the NEMA Regulations require compliance in full to Regulation 326 in terms of process and Appendix 2 (Scoping) and Appendix 3 (EIA) in terms of content, and not to “key aspects”. The MEGA view is regarded as flawed, as the approach is selective. It is not clear on which DEA&DP accepted methodology this approach is based.

		are thus symptomatic of a wider or more prevalent shortcoming, gap or inadequacy.	
		The approach as described herein, can be seen as similar to that applied in environmental auditing, where a sampling approach is commonly applied to test performance against requirements. The audit process involves tracking information, actions, and procedures, on a sampled basis, to establish whether requirements have been met in the correct manner. No site inspections or interviews were undertaken in the course of this review.	EAP response: The MEGA approach to environmental auditing, where the amended draft EIAR and its supporting documentation was “sampled” is noted. As above, the MEGA approach is regarded as selective and thus flawed.
		2. About Need and Desirability The NEMA 2014 EIA Regulations require that an EIA Report must include “a motivation for need and desirability of the proposed development”. Need and desirability must be addressed in accordance with guidelines published in this regard. This requirement must be read with relevant guidelines, namely the DFFE published a guideline in 2017 DFFE. In tandem is the 2013 guideline prepared by the Provincial Department of Environmental Affairs & Development Planning (DEA&DP). These two guidelines correlate with each other.	EAP response: The reference to the guidelines is acknowledged.
		“Motivation” is a somewhat value laden term, often associated with promoting, endorsing or advocating a particular viewpoint, programme, project – a specific ‘something’. This means there is a risk that the requirement for “a motivation for need and desirability” will be interpreted as meaning that the focus of this component of the EIA process should be on promoting, endorsing or advocating the proposed project. Such an interpretation runs counter to the intention and purpose of the EIA process and is not aligned with the approach that is explained in the aforementioned DFFE and DEA&DP guidelines.	EAP response: Comment noted. The EIA Regulations requires that the scoping report and environmental impact report (S&EIR) must provide a motivation for the need for and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred location.
		Close synonyms for motivation are reason and rationale, which means that what is being sought in the “need and desirability” information is an objective and systematic analysis of whether or not the proposed project is aligned with and will contribute to sustainability objectives and principles as reflected in applicable policies, plans, strategies and the like. Thus, the rationale or reasoning for concluding that a proposed development does meet or does not meet particular sustainability criteria must be provided. In turn, this reasoning or rationale must be	EAP response: The EIA Regulations specifically requires the consideration of how the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity, and need and desirability relates to all of these considerations. To determine if the proposed activity is the best option when considering “need and desirability”, it must be informed by the sum of all the impacts considered holistically.

		based on analysing the consequences (impacts) of meeting (or not) sustainability objectives and principles as reflected in applicable policies, plans, strategies	
		3. Both the DFFE 2017 guideline and the 2013 DEA&DP guideline note that need and desirability is “a key component of any EIA application.” There are very specific guiding points on how this component of the EIA process is to be approached, with the focus being on the (sustainability) principles in Section 2 of NEMA). This means that the requirement to consider need and desirability is aimed at incorporating a sustainability-led component into the EIA process.	EAP response: Comment is noted. Please note both the DFFE 2017 guideline and the 2013 DEA&DP guideline are guidelines and not legislated, and can be amended or supplemented according to the project specific needs and details. The socio-economic impact assessment and the EIAR has dedicated section dealing with need and desirability and sustainability
		4. Need and desirability serves to fundamentally question whether a development proposal is congruent / aligned with and will contribute to achieving sustainability objectives and principles as articulated in legislation, strategies, policies, frameworks and plans. This serves to take EIA beyond consideration of solely project-level impacts and mitigation of those impacts. Need and desirability is focused on two key avenues of analysis, namely, (i) assessing whether or not the proposed development is ecologically sustainable and (ii) determining whether or not the proposed development is socio-economically justifiable.	EAP response: The aim of EIA is to assess impacts on the geographical, physical, biological, social, economic and cultural aspects of the environment, in order to avoid negative impacts altogether, or where negative impacts cannot be avoided, to minimise and manage negative impacts to acceptable levels, while optimising positive impacts, to ensure that <u>ecological sustainable development</u> and <u>justifiable social and economic development outcomes</u> are achieved.
		5. In accordance with the principles that underpin the EIA process, this analysis must be balanced, unbiased, relevant and thorough. It must be based on accepted best practice methodologies and interpretation of results must be rationale and objective. Clearly, in dealing with ecological sustainability, reliance would be placed on specialist studies concerned with biodiversity issues, whereas the question of socio-economic justifiability would draw on specialist studies focused on social and economic issues.	EAP response: The comment is noted.
		6. Whether a proposed activity is in line with or deviates from a plan, strategy, framework or policy is not the key issue. Rather, the primary consideration is the ecological, social and economic impacts or implications that will result from the alignment with or the deviation from relevant sustainability strategies, policies, framework and plans. The EIA must specifically provide information on these impacts in order to be able	EAP response: The comment is noted. The deviation of the proposed activity from a plan, strategy, framework or policy has been discussed in detail in the amended draft EIAR where required. All the impacts associated with the proposed project were subjected to

		to consider the merits of the specific application. Where a proposed activity deviates from a plan, framework or strategy, the burden of proof falls on the applicant (and the Environmental Assessment Practitioner - EAP) to show why the impacts associated with the deviation might be justifiable.	specialist and EAP assessment and mitigation measures were developed in consultation with IAPs.
		7. According to the aforementioned guidelines, the concept of “need and desirability” relates to, amongst others, the nature, scale and location of development being proposed, as well as the wise use of land. While essentially, the concept of “need and desirability” can be explained in terms of the general meaning of its two components in which need primarily refers to time and desirability to place (i.e. is this the right time and is it the right place for locating the type of land-use/activity being proposed?), “need and desirability” are interrelated and the two components collectively should be considered in an integrated and holistic manner.	EAP response: This is a repeat of a previous comment.
		8. With regard to the issue of “need”, it is important to note that this “need” is not the same as the “general purpose and requirements” of the activity. While the “general purpose and requirements” of the activity might to some extent relate to the specific requirements, intentions and reasons that the applicant has for proposing the specific activity, the “need” relates to the interests and needs of the broader public.	EAP response: <u>“need” relates to the interests and needs of the broader public.</u> In this regard the NEMA principles specifically inter alia require that environmental management must: • “place people and their needs at the forefront of its concern” and equitably serve their interests; • “be integrated, acknowledging that all elements of the environment are linked and interrelated, and it must take into account the effects of decisions on all aspects of the environment and all people in the environment by pursuing the selection of the best practicable environmental option; • pursue environmental justice “so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person”; • ensure that decisions take “into account the interests, needs and values of all interested and affected parties”; and

			ensure that the environment is “held in public trust for the people, the beneficial use of environmental resources must serve the public interest, and the environment must be protected as the people's common heritage”. Note the broader public does not relate to the need of one IAP at the cost of other IAPs – rather all the views of IAPs are portrayed on a similar footing and weighting as equal. The EIA process followed consulted with the broader public as per the consultation proof. The C&R report consist of various public & authority comments that is in support and against the airport. The socio-economic specialist study also deals with the broader public.
		The foregoing information provides the context within which the need and desirability component of the EIA process has been assessed in this report, based on the information provided in the Draft EIAR in Section 5 entitled “Project Context, Need and Desirability, Sustainability and Climate Change”.	EAP response: Comment is noted.
		How need and desirability has been addressed in the Draft EIAR	-
		9. The manner in which need and desirability has been addressed in the Draft EIA Report for the proposed CWA expansion does not meet the requirements of the NEMA 2014 EIA Regulations as expressed in the associated guidelines published in 2017 by the national DFFE (Department of Forestry, Fisheries and Environment) and those published in 2013 by the provincial DEA&DP (Department of Environmental Affairs & Development Planning).	EAP response: This comment is addressed below in more detail.
		10. Section 5 in the Draft EIAR is focused on portraying the proposed project in a positive light, rather than subjecting it to thorough analysis as required by the aforementioned guidelines. Cherry-picking from policies, plans and strategies is evident. This is demonstrated by the focus on linking the proposed project to policies, plans and strategies that place it in a positive light such as potential stimulation of economic growth and employment opportunities, whilst paying scant or even no attention to those where it conflicts.	EAP response: Section 5 includes background information on the proposed project in way of introduction (section 5.1 Development context). Section 5.2 elaborates on the need – how this proposed project relates to the interests of the broader public (which includes passengers, the aviation sector, larger adjacent communities and not just adjacent landowners), and desirability – Geographical placement of this proposed expansion at the existing CWA in terms of land use, transport (air and land) and acting as a second airport in CoCT and a reliever to CTIA

			amongst others. Where needed the information is backed up by technical studies. The additional motivations included in Section 5.2 resulted from inputs from the aviation stakeholder sector and is included to provide a broader view on the need and desirability of the proposed project. Further to this as stated in Section 5.2.7, Appendix 36 CWA in the Context of Spatial Policy and Land Use Rights Section 6 assesses the proposed project against the 2013 DEA&DP Guideline on Need and Desirability, specifically those questions related to a strategic spatial planning perspective. The Socio-Economic Impact Assessment (Appendix 23) reiterates that the need and desirability of the proposed project was successfully illustrated through the analysis of the DEA&DP Guideline and shows contribution to economic growth, maintaining a competitive advantage by having a diversified aviation infrastructure to cater to multiple aviation needs, alleviating capacity constraints at major hubs, and illustrating that the proposed development of CWA is more time-efficient and cost-effective than building a new airport. CWA's location, ability to avoid urban constraints or have an undue negative impact on large residential communities, accessibility from major roads (N1) and railway, and reducing road congestion around the two airports adds to its desirability. The positioning and expansion of the CWA in Cape Town, recognised as a national urban node, aligns with the CoCT's competitive growth potential, and meets national, regional, and the CoCT's spatial and economic needs in terms of National Spatial Development Framework (NSDF) 2050 Outcomes, The PSDF 2014 Policies, Greater Cape Metro Regional Spatial Implementation Framework (GCM RSIF) 2019 Policies, Western Cape Growth for Jobs Strategy 2023 and Priority Focus Areas (PFA), The CoCT MSDF 2023 Policy Intent, The 2022-2027 CoCT IDP Priorities, IDP MSDF Priorities. Part of the development extends over the UDE, mostly the airside components (runway safety area). Part of the development site that is outside of the UDE includes land of 'Agricultural Significance' indicated in the MSDF. The eastern portion of the development site, which lies within the UDE, is identified as Core Biodiversity

			Area (refer Figure 19 in the amended draft EIAR). Refer to page 123 in the amended draft EIAR where agricultural significance, aquifer vulnerability and CBA mapping has been dealt with. This also links with the requirement for ecological sustainability and indication of the project in relation to legislation, policies, plans and strategies. The EAP is unclear on which to legislation, policies, plans and strategies have been omitted. The site-specific circumstances justifying deviations to accommodate CWAs expansion forms part of the land-use application as is required in terms of section 9 of the MPBL. Similarly, the LUPA application is being prepared. No amendment to the MSDF is required in terms of section 6 (b) of the Municipal Planning By-law, subject to CoCT considering that the site-specific circumstances justify a deviation from the MSDF for those parts of the proposed development that are not consistent with the MSDF. Further to this sustainability and climate change is addressed in Section 5.3.
		11. Section 5.2 - Need and Desirability commences with several excessively and somewhat over-the-top positive statements. This can only have the clear intention of placing the proposed project in a positive light, thereby promoting it, which is not the envisioned objective of the need and desirability component of the EIA process. Furthermore, it points to inadequate objectivity in the EIA process. Very bold statements are made about the benefits of airports with only one source⁶ mentioned (from the Airports Council International) and no other scientifically based citation or data source is provided.	EAP response: This comment has been addressed above.
		12. The introduction to the need and desirability section of the Draft EIAR (Section 5.2) is poorly conceived. It is characterised by general statements that are unreferenced and therefore must surely be no more than suppositions. In addition, the text is excessively wordy / verbose and comes across as marketing the project, as opposed to assessing it. A selection of examples is thus provided: a) "Cape Winelands Airport's objective is to adopt an embedded sustainability approach – prioritising, people, planet and profit."	EAP response: This comment has been addressed above. The general statements referred to in Section 5 in the EIAR serves as background information on what role CWA will play within the regional aviation sector (based on specialist opinions) and CWA's approach to its environmental responsibilities.

		a) "With the increasing awareness of finite resources that the planet has to offer CWA intends to adopt environmentally responsible methods in all their operations" and b) ".....CWA has an opportunity to harness the power of multi-airport cities to create a positive impact on the environment by reducing the carbon footprint resulting from air travel into the region." c) "CWA aims to fulfil several key roles within the aviation sector, unlocking new markets while enhancing existing ones and creating further opportunities within the sector, significantly improving the socio-economic landscape within the region." d) "It is important to note that CWA's role – even when considering the other operators in the market – will have an enhancing effect on the aviation sector for existing operators, as opposed to a mere redistribution of the market to existing sub-sectors."	"Cape Winelands Airport's objective is to adopt an embedded sustainability approach – prioritising, people, planet and profit." – provides a commitment by the applicant to its environmental responsibilities. "With the increasing awareness of finite resources that the planet has to offer CWA intends to adopt environmentally responsible methods in all their operations" - provides a commitment by the applicant to its environmental responsibilities. "CWA has an opportunity to harness the power of multi-airport cities to create a positive impact on the environment by reducing the carbon footprint resulting from air travel into the region" – factual statement based on specialist studies conducted. "CWA aims to fulfil several key roles within the aviation sector, unlocking new markets while enhancing existing ones and creating further opportunities within the sector, significantly improving the socio-economic landscape within the region." – factual statement based on specialist studies conducted. "It is important to note that CWA's role – even when considering the other operators in the market – will have an enhancing effect on the aviation sector for existing operators, as opposed to a mere redistribution of the market to existing sub-sectors." - factual statement based on specialist studies conducted.
		13. It appears that much of the terminology and information used in the need and desirability section of the Draft EIAR derives from CWA (see for example CWA presentation included in Appendix 3 of Appendix 40 to the Draft EIAR). Here one will find terms such as "embedded sustainability" and the various topics that are related to CWA's business case.	EAP response: This comment has been addressed above.
		14. The close alignment between the case for a second airport in Cape Town as presented by CWA and the content of Section 5.2 in the Draft EIAR is shown in the table below. This clearly demonstrates a misconception of the purpose of the need and desirability component in the EIA process.	EAP response: This comment has been addressed above. EAP Additional response:

Need and desirability is not concerned with the Applicant's promotional and marketing material.

CWA Presentation	Corresponding information in Draft EIAR
<u>Airline capacity:</u> Another airport needed especially during peak times to handle ever-increasing demand.	<u>Market demand and capacity:</u> CWA will alleviate pressure peak times bringing relief to domestic carriers that wish to increase flight frequency into Cape Town. Opportunity to grow inter-continental flights
<u>Affordability and accessibility:</u> Convenient option for people travelling from northern and eastern parts of the region. Reduction in travel time makes for more affordable and accessible air travel for more South Africans.	<u>Choice and geographical placement:</u> The proposed CWA would be located close to the North-East growth corridor. Having only one airport to choose from limits the ability of travellers to choose the most convenient option for them. The positioning of the proposed CWA – along the N1 corridor – is very desirable as it will be a far more convenient option for hundreds of thousands of travellers who live to the North and northeast of the city.
<u>General aviation capacity:</u> Region suffers from a major shortage of hangars, prohibiting further growth. In addition, General Aviation is not supported at CTIA	<u>General aviation:</u> CWA will be the only airport in the region other than CTIA with the infrastructure capable of serving the broader General Aviation that is currently faced with significant capacity shortages rendering the industry unable to serve the ever-increasing demand.
<u>Positive environmental impact:</u> <u>Fuel planning optimisation:</u> Quantum of reserve fuel carried by aircraft can be reduced because CWA is a much closer destination alternate. Fuel savings due to CWA will reduce carbon emissions, benefitting the entire airline industry.	<u>Alternate airport for fuel planning and environmental savings</u> A closer alternate airport that can be used for diversion fuel planning will enable significant reductions in the quantum of additional reserve fuel that is required to be carried on each flight.
<u>Socio-economic growth:</u> Airports are known drivers of economic activity. CWA will be a catalyst for economic growth, boost sustained job creation and attract investment.	"Airports are known drivers of commercial activity, harnessing the power of the multiplier effect to stimulate economic growth far beyond its own borders. The Western Cape is currently thriving, experiencing excellent year-on-year growth in terms of economic activity and

Market demand and capacity: wording derived from Appendix 16, section 3.3.1

Choice and Geographical placement: wording derived from Socio-economic IA Appendix 23, Section 51, and reiterated by Land Use Planning report (Appendix 36) section 6.2.

General Aviation: The strategic positioning of CWA towards GA is illustrated in section 3.3.1 in Appendix 16. Currently, GA operators struggle to compete for take-off/landing slots at CTIA due to the high volume of scheduled commercial operations, which take preference.

Detailed planning to accommodate the GA in the region was illustrated through the CONOPS (Appendix 18). Concerns raised by the GA were addressed in the Airspace and Capacity study (Appendix 20). It resulted in amendment to the SDP and fuel planning for the proposed project. Also identified as positive impact Provision of transport infrastructure in Socio-economic IA (Appendix 23): *It would also increase the available hangarage facilities in the market and unlock the Western Cape GA market, which is currently severely constrained.*

Alternate airport for fuel planning and environmental saving: wording derived from findings of Appendix 22 Alternate Airport study and the PACE report Appendix 15.

Socio- economic growth: identified as a cumulative impact (positive) in the Socio-economic IA (Appendix 23): *Similar projects in the COCT would act synergistically to create more demand for supplies and services, which, due to the multiplier effect, would act as a catalyst for further economic growth and employment.*

Logistics hub: The Socio-economic IA (Appendix 23) states: **Commercial Development:** *Multimodal connectivity and synergistic landside activities can turn the airport into an economic node and growth catalyst for the region.*

The report also states: *The airport would also serve as a significant multimodal transport hub given its strategic location alongside the Saldanha and CT Port-linked Mellish Station (Rail), and only a few kilometres from the N1 highway, enabling efficient sea-rail-road-air linkages.*

	<table><tr><td></td><td>population. For this growth to continue, new growth nodes, unrestricted air access, and the ease of connectivity, are essential.” This wording is an exact repetition of information on the CWA website.⁹</td></tr><tr><td>CWA Presentation</td><td>Corresponding information in Draft EIAR</td></tr><tr><td><u>Logistics hub:</u> Catalysing multi-modal commercial activity in the region and stimulating economic growth.</td><td><u>Logistics hub:</u> Catalysing multi-modal commercial activity in the region and stimulating economic growth. CWA is well located relative to Cape Town, Stellenbosch and Drakenstein to foster economic growth and facilitate logistical activity.</td></tr><tr><td><u>Commercial property developments</u> Stimulated and enabled by the above.</td><td><u>Commercial property developments</u> Stimulated and enabled by the above.</td></tr><tr><td><u>Redundancy:</u> A new airport is needed nearby in case of emergency, unavailability or unsuitability of other airports in the region. Such incidents include adverse weather, runway closures and equipment failures.</td><td><u>Resilience and Redundancy:</u> Having two airports improves resilience to disruptions due to factors such as weather delays or maintenance issues.</td></tr><tr><td><u>Improved air access:</u> Due to increased airport capacity provided by CWA, new opportunities for air access and route development will be created.</td><td><u>Multi-airport cities</u> <u>CWA's complementary role to CTIA on route viability and air access</u> Multiple airports in the same city often lead to increased competition among airlines, which can drive down prices, improve service quality, and introduce new routes.</td></tr></table>		population. For this growth to continue, new growth nodes, unrestricted air access, and the ease of connectivity, are essential.” This wording is an exact repetition of information on the CWA website. ⁹	CWA Presentation	Corresponding information in Draft EIAR	<u>Logistics hub:</u> Catalysing multi-modal commercial activity in the region and stimulating economic growth.	<u>Logistics hub:</u> Catalysing multi-modal commercial activity in the region and stimulating economic growth. CWA is well located relative to Cape Town, Stellenbosch and Drakenstein to foster economic growth and facilitate logistical activity.	<u>Commercial property developments</u> Stimulated and enabled by the above.	<u>Commercial property developments</u> Stimulated and enabled by the above.	<u>Redundancy:</u> A new airport is needed nearby in case of emergency, unavailability or unsuitability of other airports in the region. Such incidents include adverse weather, runway closures and equipment failures.	<u>Resilience and Redundancy:</u> Having two airports improves resilience to disruptions due to factors such as weather delays or maintenance issues.	<u>Improved air access:</u> Due to increased airport capacity provided by CWA, new opportunities for air access and route development will be created.	<u>Multi-airport cities</u> <u>CWA's complementary role to CTIA on route viability and air access</u> Multiple airports in the same city often lead to increased competition among airlines, which can drive down prices, improve service quality, and introduce new routes.	<u>Resilience and Redundancy:</u> The Alternate Airport study (Appendix 22) states: <i>Operational Resilience: Alternate aerodrome planning enhances the operational resilience of airlines by providing fallback options in the event of disruptions during the en-route phase of a flight or at the destination aerodrome. By having alternate aerodromes strategically identified and prepared, airlines can minimize the impact of unforeseen events on flight schedules and passengers.</i> <u>Multi airport cities:</u> the provision of transport infrastructure in the form of an additional airport within the CoCT area, is assessed as an impact within the Socio-economic IA (Appendix 23). In conclusion: the wording in the EIAR originates from specialist studies as illustrated above, which was then used by the CWA in presentations to stakeholders. The EAP is in agreement with this approach.
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	15. The effect of focusing primarily on information related to the ‘business case’ or motivation for an expanded CWA is that exactly what the DFFE and DEA&DP guidelines on need and desirability warn against has been achieved. That is to say, these guidelines specifically state that ‘need’ is not to be confused with the “general purpose and requirements” of the activity, which would be concerned with the requirements, intentions and reasons that the applicant has for proposing the specific activity. The “need” relates to the interests and needs of the broader public. What has occurred in this case is that the ‘general purpose and requirements’ of the Applicant has been erroneously transposed as demonstrating the need for the proposed project.	EAP response: This comment has been addressed above.												
	16. This is not to say that some of the issues raised in the section on need and desirability are not of relevance to the broader economy of the region. The difficulty with the information provided is that it is substantially concerned with the reasons (motivation) that the Applicant has put forward. Evidence for claims made are scarce (i.e. no supporting research cited) and the only specialist reports to which reference is made are those that deal with	EAP response: This comment has been addressed above.												

		support for multi-airport cities, alternate destination requirements and associated fuel savings.	
		17. There is a tendency to use information in a way that exaggerates the potential benefits of the proposed project. This is evident in the use of terminology and language that is flashy and extravagant as would be typified in marketing material:	EAP response: This comment has been addressed above.
		a) Examples of non-weather-related flight diversions are given in the Draft EIAR in the context of “Resilience and Redundancy”. These incidents are described as having caused “mass diversions” which is an exaggeration. In respect of the 29 July 2024 incident, it was reported that four planes had to be diverted. This does not constitute a “mass diversion” of flights.	EAP response: The amended draft EIAR states <i>29 July 2024 – runway lights & critical airside safety systems offline due to a two-day power outage, causing the mass diversions of aircraft, including 2 wide body diversions to JHB.</i> It is unclear where the IAP sourced 4 planes. Surely not only 4 planes land at CTIA within a 2-day period.
		b) The impact of the development of CWA in its role as an alternate for diversion and fuel planning has been assessed as having an immediate and hugely positive impact on airline operations into Cape Town as a whole.”	EAP response: The statement is supported by a technical industry approved study. Refer Appendix 15 to the amended draft EIAR.
		c) It is argued that Cape Town needs a second airport now “to enable the dormant market efficiencies, risk mitigation and improvements that are available to it as a city. Cape Town is growing and to ensure that this growth is not stunted, air access is key.”	EAP response: The comment is noted. The statement forms part of the background provided as part of Need and Desirability and is based on aviation industry stakeholder engagement and specialist input. Appendix 16 to the amended draft EIAR highlights the benefits of CWA to the aviation industry and CoCT.
		d) “This plays a complementary role towards CTIA’s own growth ambitions, as there will be routes that simply would not be feasible to target without CWA complementing the business case of flying to Cape Town, in CWA’s role as a diversion alternate for fuel planning.	EAP response: The comment is noted. The statement forms part of the background provided as part of Need and Desirability and is based on aviation industry stakeholder engagement and specialist input. Appendix 16 to the amended draft EIAR

			highlights the benefits of CWA to the aviation industry and CoCT. Appendix 22 assesses CWA as an alternate airport to CTIA.
		18. Section 5.2.7 – Spatial Perspective points to Appendix 36, prepared by H&A Planning which contains information on need and desirability from a spatial planning perspective. This report references the 2013 DEA&DP need and desirability guideline – Section 6.1 deals with Need (Timing) and Section 6.2 with Desirability (s and.	EAP response: Comment noted. There is text missing at the end of the statement as received from the IAP.
		a) The point of departure in Section 6.1.1 – Alignment with Strategic Policy and Planning is as follows: “The positioning and expansion of the CWA in Cape Town, recognised as a national urban node, aligns with the Greater Cape Metro's competitive growth potential, and meets national, regional, and the CoCT's spatial and economic needs.” ¹⁶ This is a very broad and non-specific statement as it could be attributed to any significant investment project. Put differently, this is an imprecise and nebulous statement and in fact, shows an immediate bias or tendency towards promotion of the proposed expansion of the CWA, rather than providing an objective assessment.	Response from town planner: This is an introductory paragraph ending with a “colon” (:) which is a punctuation mark used to introduce information that elaborates on or explains in the following sections. To draw conclusions of bias on the basis of the introductory paragraph overlooks the rationale presented in section 6.2 on Location Factors and throughout Appendix 36. The comment also fails to recognise that areas where the proposal is not consistent with the MSDF and the District Plan. Deviations from the MSDF is dealt with in four sections in the report. Citing areas of alignment with strategic frameworks is a fundamental part of assessing spatial desirability and determining a project's strategic fit within the hierarchy of plans. Simply put, it's about framing the development within the context of existing spatial and economic plans. Regarding the comment that “it could be attributed to any significant investment project” underscores an important point not recognised in the comments by MEGA. While major investments of this scale are few, their regional economic multiplier effects remain significant, regardless that the benefits may seem generic. Evidence for employment quantification is provided in App-23-CWA-Socio-Economic-Impact-Assessment.
		b) Section 6.1.1 of Appendix 36 also references Section 4.4.6 is the National Spatial Development Framework (NSDF), which relates to transport and other infrastructure. ¹⁷ What is not mentioned is the full	Response from town planner:

		context of the NSDF statement. Section 4.4.6 of the NSDF specifically notes that a well functioning and well-managed national transport and connectivity infrastructure network is required and that these networks must be “strategically planned, built, and maintained in support of post-Apartheid spatial transformation and inclusive economic growth.” It is unclear as to how an expanded CWA would contribute to the objectives of spatial transformation and inclusive growth as this is not explained or assessed.	As above. Section 6.2 of App 36 on Location Factors explicitly connects the strategic context established in Section 6.1 at the local level. Section 6.2 of App 36 under the heading “How will CWA promote or act as a catalyst to create a more integrated settlement in terms of its nature, scale and location of the development?” on pages 20 to 22 addresses how an expanded CWA would contribute to the objectives of spatial transformation and inclusive growth.
		19. Several direct quotes / statements from various strategic plans, such as the NSDF, the PSDF (Provincial Spatial Development Framework), the Western Cape Growth for Jobs Strategy 2023 and the City of Cape Town Municipal Spatial Development Framework (CoCT MSDP) are listed in Section 6.1.1 of Appendix 36. These relate to outcomes, priorities and / or objectives that are primarily concerned with issues such as urbanisation, urban-rural linkages, transport infrastructure, transport routes and connectivity, economic opportunities and growth, and job creation. There is, however, no analysis provided as to how exactly an expanded CWA will contribute to these priorities, outcomes and / or objectives. The entire Section 6.1.1 seems to be premised on the assumption that the proposed CWA expansion project is aligned with and will be beneficial to the listed priorities, outcomes or and objectives, without providing the reasoning or rationale behind this. Mere provision of direct quotes from strategic plans / policies / plans does not constitute analysis.	Response from town planner: The introduction to par 6.1.1 “Alignment with Strategic Policy and Planning” states that it is presented under this section as a summary and is discussed in depth with the detailed references in a separate part of App 36. The text here references Part D of App 36 but is in fact in Part C which is clearly headed as “SPATIAL POLICY ALIGNMENT”.
		20. In Section 6.2 of Appendix 36, there is a notional attempt to address a few of the questions from the aforementioned need and desirability guidelines (those of DEA&DP), but with limited reference to which specific aspects of applicable policies / plans or objectives are being addressed, if any. By this is meant that there is very little attempt to link these questions and answers to the various extracts from plans / policies / strategies covered in Section 6.1.	Response from town planner: The introduction to par 6.1.1 “Alignment with Strategic Policy and Planning” states that it is presented under this section as a summary and is discussed in depth with the detailed references in a separate part of App 36. The text here reference Part D of App 36 but is in fact in Part C which is clearly headed as “SPATIAL POLICY ALIGNMENT”.

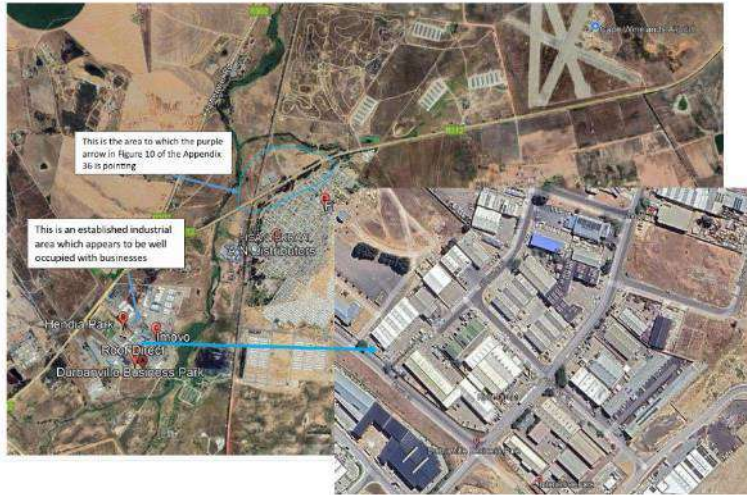
		21. One example is the following: How will CWA create residential and employment opportunities in close proximity, reducing transportation needs? What is the impact on job creation, travel distance for laborers, and the distribution of job opportunities. How will CWA correct historical spatial distortions? The response is as follows:	EAP response: The quote from Appendix 36 is noted.
		b) “CWA is efficiently located in proximity to labour supply, without the induced demand for extensive travel distances. CWA’s expansion aligns with the CoCT’s IDP and MSDP strategy of economic growth “where people have more equitable access to economic opportunities” and where “people experience decreased spatial dislocation from social and economic benefits. Nearby disadvantaged communities such as Fisantekraal and Klipheuwel will benefit from improved access to and increased diversity of job offerings during and after construction, thereby reducing their spatial dislocation on the outskirts of the city. Without a significant catalytic project, the chances for creating job opportunities at scale in these dormitory areas are slim, as illustrated by the failed Fisantekraal Industrial Park.” (emphasis added).	Response from socio-economic specialist: The following recommendations were made in the Socio-Economic Impact Assessment to ensure that the local community will benefit from new employment opportunities: Procurement Strategy: a) Initiate the activity during the first phase of the development; b) The strategy is the responsibility of the contractor(s) collectively under the guidance of the Municipality; c) Focus on opportunities for local labour in the surrounding areas and businesses as a priority. Contractors are required to indicate the geographical location of sub-contractors (businesses) and local labour; d) Local contractors invited to tender for work in the context of the terms and conditions included in RFP documentation, which would include skills development, on-site training, gender equality, etc.; e) Approved programme aligned with the future construction phases of Greenville Garden Cities, Bella Riva and other planned/approved developments in the area to minimise the impact on the greater community
		c) CWA’s location as a secondary airport just outside the metropolitan area reduces the need for lengthy trips to Cape Town International Airport (including additional congestion around CTIA) for the City’s northern suburbs and residents in municipalities like Swartland, Bergrivier, Drakenstein, Stellenbosch, Breede Valley and Witzenberg.”	EAP response: The IAP omitted the first statement that reads: <i>CWA is efficiently located in proximity to labour supply, without the induced demand for extensive travel distances. CWA’s expansion aligns with the CoCT’s</i>

		The reduction in travel time and distance for residents to get to an airport has little to do with the question, which is focused on travel distance to work for labourers and distance between residential areas and places of work.	<i>IDP and MSDF strategy of economic growth “where people have more equitable access to economic opportunities” and where “people experience decreased spatial dislocation from social and economic benefits.” Nearby disadvantaged communities such as Fisantekraal and Klipheuvel will benefit from improved access to and increased diversity of job offerings during and after construction, thereby reducing their spatial dislocation on the outskirts of the city. Without a significant catalytic project, the chances for creating job opportunities at scale in these dormitory areas are slim, as illustrated by the failed Fisantekraal Industrial Park.</i> The statement provided by the IAP relates to labour using CWA to fly to other cities in South Africa for work. Response from town planner: This comment is limited to labourers commuting to work. While proximity between residential areas and employment opportunities is indeed a key consideration, the broader principle of spatial accessibility is not limited to daily work trips — it also encompasses access to essential infrastructure, including airports. The stimulus that can be provided by the airport expansion to be a catalyst and accelerator of work opportunities in the local area is discussed in App 36. Although not falling narrowly under the category of labourers, business flights is a significant component of air traffic in and out of Cape Town as manifested by the high occupancy for early morning and late afternoon flights between Cape Town and Johannesburg.
		22. Another example is: How will CWA promote or act as a catalyst to create a more integrated settlement in terms of its nature, scale and location of the development? The response includes these statements:	Response from town planner: This comment selectively fails to consider the broader urban development priorities for the area, especially the Northern District Plan's objective to promote industrial growth north of Lichtenberg Road.

		a) “Clearly the spatial planning intention is to create work opportunities in this area to prevent the larger Greenville and other residential areas becoming embedded as mono-use dormitory towns.”	EAP response: this comment has been addressed above.
		b) “Without a massive catalyst, the existing Fisantekraal Industrial area and the large extent between it and the airport, is unlikely to be developed as a thriving industrial employment node over the next 20 years. A more probable scenario is that it will become another informal settlement.”	EAP response: this comment has been addressed above.
		c) “The photograph in figure 10 above illustrates the challenge of converting the vision of making the area coloured up in purple on the map into a thriving employment node. At present the gateway to the industrial park sadly reflects unfulfilled employment expectations next to large monofunctional dormitory developments.” and “The proposed airport development has the potential to put the Fisantekraal Industrial Area literally and figuratively on the map.”	EAP response: this comment has been addressed above and below.
		23. It is surprising to see an argument for the proposed expanded CWA as being necessary as a catalytic project to increase the diversity of job offerings and to reduce the spatial dislocation of the Fisantekraal and Klipheuwel communities on the outskirts of the city (see also reference to Figure 10 in Appendix 36). The premise of the argument presented in Appendix is based on the following:	EAP response: this comment has been addressed above and below. There is significant residential development in the Fisantekraal area but limited industrial development that will create employment for local residents. CWA will provide a range of employment opportunities within close proximity of these residential areas, thus reducing travel time and costs.
		a) No reference to a failed Fisantekraal Industrial Area could be sourced via internet searches or to ruins at its entrance could be found. The source of the photograph in Figure 10 of Appendix 36 is not given.	Response from town planner: The fact that internet searches by MEGA failed to yield results for, underscores the point that the Fisantekraal Industrial Park is not a thriving employment location. The I&AP can find the evidence of a failed Fisantekraal Industrial Area on the corner of Lichtenburg Road and Boy Biers Drive, a secondary entrance to the Fisantekraal area and closer to CWA than the referenced industrial park in the

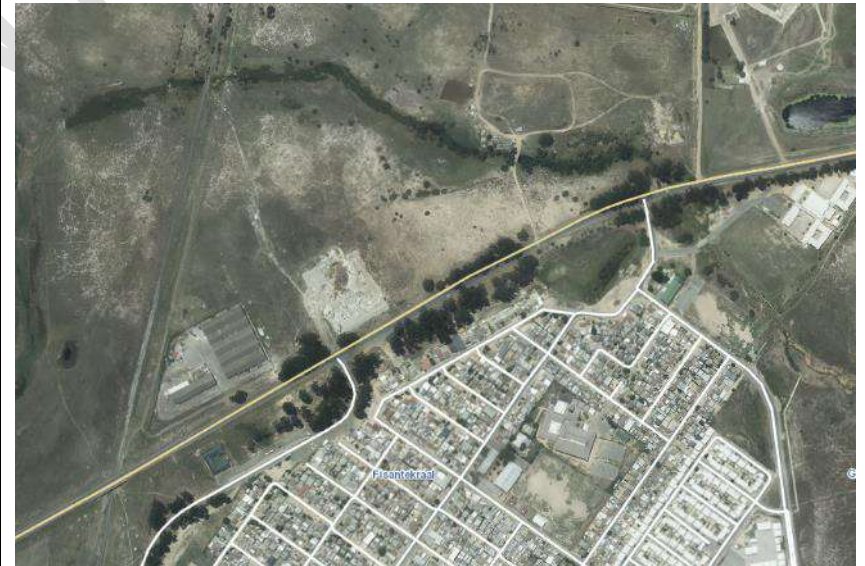
			MEGA comments further down. The source of the photograph is Google Earth Streetview 6/2024.
		b) Reference to the following diagrams shows the presence of an active industrial area evident on the Google Earth image of the area in February 2025. From these images, it can be seen that the industrial area is situated very close to the Fisantekraal community. There is land available for further development. Most units appear to be occupied judging by the presence of vehicles.	Response from town planner: This argument misses the point in that it is not about the lack of industrial land, but the lack of economic activity. This argument does not engage with the broader urban development priorities for the area, especially the Northern District Plan's objective to promote industrial growth north of Lichtenberg Road. While the emerging industrial development southwest of Greenville referenced by MEGA is a positive step, it represents only a small fraction of the employment opportunities that are required. Fig 10 in Appendix 36 and the comments made referred specifically to the north of Lichtenberg Road earmarked for Industrial development in the City's District Plan. Page 21 of Appendix 36 reads: <i>The area directly west of the existing airport is designated for "industrial" use in Northern District Plan (See Fig. 10). The area stretches up to the railway line all the way north of Lichtenburg Road.</i> The text further explains that <i>"commercial and industrial nodes do not develop because spatial plans and zonings permit such land use. It only happens where the cumulative agglomeration advantages and symbiotic business interdependencies make it possible."</i> AND <i>"Without a massive catalyst, the existing Fisantekraal Industrial area and the large extent between it and the airport, is unlikely to be developed as a thriving industrial employment node over the next 20 years. A more probable scenario is that it will become another informal settlement."</i> <i>"The photograph in figure 10 above illustrates the challenge of converting the vision of making the area coloured up in purple on the map into a thriving employment node. At present the gateway to the industrial park sadly reflects</i>

			<i>unfulfilled employment expectations next to large monofunctional dormitory developments.”</i>
		24. The reasoning provided in Appendix 36 as described in the foregoing points cannot be sustained. Based on the visual evidence from the Google Earth image, there is no indication to support the interpretation of the Fisantekraal Industrial Area as failed, which is used as motivation for an expanded CWA to serve as a catalytic project. This is another way in which information has been interpreted so as to enhance the ‘positives’ of the proposed project. Measures to bring job opportunities closer to communities in that area are already underway. It also needs to be born in mind that agricultural activities with associated rural character are an important part of the area. Figure 10 as shown in Appendix 36 Fig. 10. The Ruins of the Entrance to the Fisantekraal Industrial Park. Superimposed on an Extract of Sub-date 3 Plan in the Northern District Plan	Response from town planner: MEGA’s superficial interpretation that the Google Earth images reflect economic activity is misplaced. The buildings in the industrial park north of Lichtenburg Road are in a dilapidated state and were erected more than 30 years ago. The below image is based on City Mapviewer, noting that pre-1996 photography at this view scale and for this area, are of a very low resolution and not used here. Source: City Mapviewer 1996



The reference that “that agricultural activities with associated rural character are an important part of the area” is devoid from reality in respect of the land under discussion here.

Note the orchard near Lichtenburg Road in the triangle formed by the road, the railway line to the west and the Mosselbank River to the north-east, with the existing structures in the southwestern corner. As indicated by the most recent aerial photography on City Mapviewer, the only changes in the past 30 years are that the orchard has been replaced with an illegal dump site. This cannot by any stretch of the imagination be considered as a thriving industrial park creating jobs for the large formal and informal population that located here subsequently. The description and conclusions in App. 36 are fair and reasonable.



Source: City Mapviewer 2023

Shown below are the orchard and pastures that existed before Greenville was developed:

CONFIDENTIAL



Former orchard. Source: City Mapviewer 1988
The 2023 image below shows the illegal tip site and clear signs of soil erosion.



Illegal tip site where orchard used to be. Source: City Mapviewer 2023

Further justification is shown in The Google Earth Streetview image showing a person coming from the direction of Greenville across the road, with a wheelbarrow going towards the illegal tip site.



Source: Google Earth Streetview 6/2024

		25. The foregoing examples demonstrate skewed informed, that favours the proposed project. They are premised on the proposed project going ahead – there is no critical analysis evident.	Response by town planner: These claims are not substantiated, as MEGA is not giving due consideration to the City's policy imperatives, appear confused between different industrial sites, make incorrect deductions from aerial photography, and seemingly submitted comments without a site visit. Furthermore, MEGA's comments fail to account for urban economic dynamics by assuming that the mere availability of vacant industrial land will automatically lead to development.
		26. Potential social costs have not been adequately or comprehensively addressed in the need and desirability section. Who / which communities will bear the cost of adverse impacts of the proposed project, especially noise disturbance, potential disruption to rural character / sense of place, to name but two issues? The interests and needs of the broader public have not been adequately addressed. These include land use compatibility, noise and sense of place issues. For example, noise is a major concern and with it associated issues such as community health, but these aspects are not mentioned in Section 5.2 of the Draft EIAR.	EAP response: Social costs are addressed through the Socio-economic IA (Appendix 23 to the amended draft EIAR), with the main findings included in section 5.2.7 of the amended draft EIAR. Land use compatibility is addressed through Appendix 36 of the amended draft EIAR, Noise is addressed through the Noise IA (Appendix 5 of the amended draft EIAR) and Heritage is addressed through the HIA (Appendix 12 of the amended draft EIAR). Response from socio-economic specialist: Potential impacts related to the sense of place were addressed in the Socio-economic Impact Assessment, as well as the communities likely to be affected by the different impacts.
		27. Inadequate account has been taken of the CoCT MSDF Substrategy 2.3: Appropriately protect the citizens of Cape Town from risk areas and activities, Policy 16: Direct urban growth away from risk areas and activities. This includes the following:	EAP response: to be responded to below.
		d) P16.1 – "Discourage inappropriate land development in mining blasting zones, servitudes, heavy or noxious industrial zones, major hazardous installations, solid waste disposal and wastewater	Response from town planner:

		treatment and transfer sites, cemeteries or areas subject to regular flooding or flood risk, sea-level rise risk areas or related buffer areas. Direct urban growth away from risk areas and activities.” (emphasis added).	MSDF Policy 16 notes that “<i>Risk areas are either already determined through proclamations/ law or specialist studies, or will be determined as part of the EIA processes or pre-submission consultation processes and include both man-made and natural risks</i>”. Policy 16.1 refers to other development being located close to certain risk areas. The CWA, being on the Urban Edge, is well positioned to direct inappropriate development away from its areas of higher risk. MEGA is misinterpreting Policy 16 based on the wrong reading of Policy Statement 16.1. Policy Statement 16.1 describes certain areas from which “inappropriate development” should be directed away from “mining blasting zones, servitudes, heavy or noxious industrial zones, major hazardous installations, solid waste disposal and wastewater treatment and transfer sites, cemeteries or areas subject to regular flooding or flood risk, sea level rise risk areas or related buffer areas. Should CWA be deemed a risk area, then “<i>inappropriate development</i>” should be directed away from it in future.
		e) P16.5 – “Future dualling of the planned Cape Town International Airport (CTIA) single realigned runway to be a key consideration. Proposed development must balance economic benefits with noise impact on existing and potential informal or formal residential development, as well as on a range of social infrastructure such as clinics, schools, elder-care facilities and halls.” (emphasis added). Whilst this statement is concerned with CTIA, it demonstrates that concern about aircraft noise is articulated in the CoCT MSDF.	Response from town planner: Noted. Noise is a relevant issue that must be considered by the City.
		28. It is evident that the proposed CWA expansion will introduce both a Major Hazard Installation (MHI) associated with fuel storage, albeit classified as a Low Hazard in terms of the applicable legislation. It will also introduce a noise risk into the area. Whilst the Noise Impact Assessment states that 55 dB(A) contour will be contained within the CWA site until such time as it is fully operational (Scenario 3), it also shows that there will be several incidents where noise will exceed 70 dBA.	EAP Response: the 2 studies referred to are acknowledged.

		29. In terms of the consistency principle in the CoCT MSDF, risk layers need to be considered. Residential and community use should not be located within the 65 dBA noise contour area. This is shown on Map 5a in the CoCT MSDF. According to the Noise Impact study, there are identified areas for future residential development that fall within this risk zone and are therefore inconsistent with the CoCT MSDF. This is not discussed or mentioned in Section 5.2 – Need and Desirability in the Draft EIAR.	Response from town planner: MEGA is misinterpreting Section 7.3 “Spatial information in the MSDF to be used for determining consistency” of the MSDF. Consistency with the MSDF is not a “principle”. It is a ruling that the City makes in terms of s.99(1)(b) of the Municipal Planning By-law. Section 7.3 of the MSDF and Table 1a give guidance on determining the consistency of land-use with the MSDF. Certain land use applications would be considered inconsistent with the MSDF should it fall within the 65 dBA contours and that would require specific processed to be followed as determined by the MPBL. Amongst others, the inconsistency will have to be advertised. Policy 16.1 refers to other development being located close to certain risk areas. The CWA, being on the Urban Edge, is well positioned to direct inappropriate development away from its areas of higher risk. MSDF Policy 16 notes that <i>“Risk areas are either already determined through proclamations/ law or specialist studies, or will be determined as part of the EIA processes or pre-submission consultation processes and include both man-made and natural risks”</i> Should CWA be deemed a risk area, then <i>“inappropriate development”</i> should be directed away from it in future. This means that within certain noise contours, only certain types of development will be considered appropriate. There is no existing residential development within the 65 dBA contour, nor any existing residential land use rights.
		30. The one item from the CoCT MSDF that is mentioned is Implementation intent: P16.13 - “Support complementary and appropriate land development at the Cape Winelands Airport that will contribute to the efficiency of CTIA in terms of general aviation and related uses.” This statement is of course seen as supportive of the proposed project, as is evidenced by the amount of information in Section 5.2 of the Draft EIAR on the need for two airports and for Cape Town to be a multi-airport city. Thus, statements from the MSDF that are ‘supportive’ of the project are	Response from town planner: The statement in the MSDF is seen as supportive of the proposed project because it is supportive. The deviations from MSDF are highlighted in sections 5.2.6, 5.2.7 and 8.1.2 in the Draft EIR as well as extensively in App 36.

		discussed, whereas those that may not be supportive of the project are ignored. This does not meet the requirements of need and desirability. It is required, as mentioned elsewhere, to assess the impact of both alignment to and conflicts with applicable strategies, plans and policies.	
	31. In fact, quite the opposite has taken place: “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” ¹⁹ (emphasis added). The use of the term ‘extremely’ is misplaced and hyperbolic. Note that there is a total lack of reference to relevant spatial plans and potential future land use planning as reflected in, for example, the CoCT MSDF. Examination of this plan and the Northern District Plan both show that the CWA site is abutted by land proposed for residential development. Thus there is a land use incompatibility issue at hand.	Response from town planner: Given the requirements from both a landside and airside point of view, and for the reasons set out in this section, the applicant could not identify a better located site within the MSDF area. It is notable that no I&AP suggested a better located site. Careful consideration was given to all relevant spatial plans. The relevant content of the MSDF and the Northern District Plan is discussed in detail in the appendices to this NEMA application. Section 14 (4) of the MPBL states: “<i>The municipal spatial development framework does not confer or take away rights</i>” and section 16(3) states “<i>A district spatial development framework and a local spatial development framework do not confer or take away rights</i>”. It is also noteworthy that the neighbouring Bella Riva is making a new application under NEMA. Bella Riva has positively responded by developing a flexible site plan to accommodate the potential expansion of CWA.	
	32. Information relating to need and desirability from Appendix 36 (CWA in the context of spatial policy and land use rights) has simply been copied into the Draft EIAR. It is a requirement to consider need and desirability in land use planning applications. Notwithstanding that reference is made to the 2013 DEA&DP guideline in Appendix 36, need and desirability is addressed primarily from a land use planning perspective. The fact that this information has simply been copied into the Draft EIAR means that it has not been evaluated and interpreted from an environmental perspective. The EAP has not applied his/her mind to the implications from an environmental perspective. For example, a planning perspective would be expected to address compatibility of a proposed development with adjacent land uses, whereas from an environmental perspective the focus	EAP response: Information from Appendix 36 was quoted in the amended draft EIAR text as part of the evaluation of Need and Desirability. Interpretation and evaluation are included in Section 5 of the EIAR, along with additional considerations of environmental impacts on the adjacent communities and biophysical environment amongst others. Responses on Need and Desirability has been provided above to similar comments.	

		would be on the environmental consequences of a proposed development on adjacent communities and environmental sensitivities.	
		33. The following is apparently taken from the 2022-2027 CoCT IDP priorities: Transport: “A city that is better connected will be more productive and create more economic opportunities” and it will be “cheaper and faster to move around the city to access jobs and services.” The wording within the quotation marks is not exactly as stated in the IDP. More importantly, transport is dealt with in the IDP in terms of issues such as public transport, the need for safer and more efficient transport systems improving the dysfunctional rail network, addressing traffic congestion²². None of these issues are related to air travel or the need for additional air travel facilities. It is beyond comprehension and logic that the proposed project can be put forward as part of the offering to make it cheaper and faster to move around the city to access jobs and services.	Response by town planner: In terms of local government legislation, the IDP is primarily a strategic instrument that guides the City’s medium-term budgeting and resource allocation. As such, it focuses on levers directly under the City’s control, such as aspects of public transport and municipal land. Strategically, the emphasis is on outcomes rather than inputs. Economic growth is a top-tier priority in the IDP, while transport—broadly including inter-city mobility—is identified as a second-tier priority. Although airport-related projects fall within the City’s area of influence rather than its direct control, the proposed expansion will still meaningfully support several key objectives outlined in the IDP, such as: ECONOMIC GROWTH OBJ 1: Increased jobs and investment in the Cape Town economy TRANSPORT OBJ 12: A sustainable transport system that is integrated, efficient and provides safe and affordable travel options for all and OBJ 15: A MORE SPATIALLY INTEGRATED AND INCLUSIVE CITY. While proximity between residential areas and employment opportunities is indeed a key consideration, the broader principle of spatial accessibility is not limited to daily work trips — it also encompasses access to essential infrastructure, including airports. The stimulus that can be provided by the airport expansion to be a catalyst and accelerator of work opportunities in the local area is discussed in App 36. In addition, business flights area a significant component of air traffic in and out of Cape Town as manifested by the high occupancy for early morning and late afternoon flights between Cape Town and Johannesburg.
		34. Similarly, it is illogical to claim that the proposed CWA expansion will materially contribute to the IDP priority whereby “people experience decreased spatial dislocation from the social and economic benefits that Cape Town has to offer.” The IDP notes: “The two most important ways in which the City can drive spatial integration and transformation are through investment in public transport and the release of City-owned land. How	Response from town planner: See 34 above. Public transport and City-owned land are two instruments at the City’s disposal. The IDP focuses on the City’s areas of direct control, rather areas of influence. By creating jobs and acting as catalysts for other

		land is used, and how and where housing and transport services are developed, all work together to create the urban conditions for economic growth and prosperity.”	employment creation opportunities in the area, CWA will contribute to this IDP priority. The very recent NEMA application by Bella Riva is also a case in point.
		35. The examples given in points 34 and 35 demonstrate a stretching of the facts by selectively using an IDP priority to shore-up the notion that a proposed high-end project is aligned to IDP priorities. Air travel does not assist public transport systems as a means of improving integration of the city and connecting spaces within the city. This is a far-fetched notion.	Response from town planner: See response to 34 above
		36. A key motivation provided in the need and desirability section of the Draft EIAR is that CWA will serve a complimentary role to CTIA. One of the ways this will be achieved, it is argued, is that this will assist new routes to become “viable that previously were not viable due to aircraft range and profitability constraints. This will allow CTIA to target new routes that were previously not possible, thereby growing their own market share”. Not a single example of any potential routes that are not currently viable, that would become viable due to the presence of CWA as is given. No research in this regard is cited and no supporting data is provided. Therefore, this potential benefit can only be seen as speculative.	EAP response: this is a duplication of a previous comment addressed above.
		37. Another benefit that is put forward is that of CWA’s role as a reliever airport, as shown in the table below.	EAP response: this is a duplication of a previous comment addressed above.

	<table><tr><th>Benefit from Draft EIAR</th><th>Comment</th></tr><tr><td>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.</td><td>This reasoning is highly speculative. No evidence that major events have been compromised or not awarded due to insufficient airport capacity is cited. The Western Cape Growth for Jobs strategy does not state that an additional airport is needed. It does mention the need to implement the expansion plans for CTIA which had been deferred due to the Covid-19 pandemic.</td></tr><tr><td>CWA will contribute toward continuity of economic activity (trade and tourism) in the event of an extended closure at CTIA.</td><td>This issue is nowhere near as simple to deal with as suggested in the comment alongside. A recent example is the extended closure of Heathrow, an airport in a city that has more than one alternate airport. Only in-progress flights could be redirected and all other flights were cancelled and would have had to be rebooked. In fact, it has been reported that many long-haul flights simply returned to their point of departure²⁶. The manner in which extended closures of airports is dealt with is not as simple as is made out by the alongside comment. Any research will show that a chaotic situation arises, and it is not just a simple matter of seamless continuity of economic activity.</td></tr><tr><td>CWA could provide additional temporary or permanent capacity during peak periods (slot constraint times and peak seasons noting the seasonal nature of visitor trends).</td><td></td></tr><tr><td>CWA will offer redundancy in the event of catastrophic fires, structural failures, fuel or power supply interruptions, etc</td><td>Such catastrophes could be regional and affect both airports. Jet fuel constraints, if they occur, would potentially have a nation-wide effect and not just affect CTIA and not CWA. Similarly with power outages.</td></tr></table>	Benefit from Draft EIAR	Comment	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.	This reasoning is highly speculative. No evidence that major events have been compromised or not awarded due to insufficient airport capacity is cited. The Western Cape Growth for Jobs strategy does not state that an additional airport is needed. It does mention the need to implement the expansion plans for CTIA which had been deferred due to the Covid-19 pandemic.	CWA will contribute toward continuity of economic activity (trade and tourism) in the event of an extended closure at CTIA.	This issue is nowhere near as simple to deal with as suggested in the comment alongside. A recent example is the extended closure of Heathrow, an airport in a city that has more than one alternate airport. Only in-progress flights could be redirected and all other flights were cancelled and would have had to be rebooked. In fact, it has been reported that many long-haul flights simply returned to their point of departure ²⁶ . The manner in which extended closures of airports is dealt with is not as simple as is made out by the alongside comment. Any research will show that a chaotic situation arises, and it is not just a simple matter of seamless continuity of economic activity.	CWA could provide additional temporary or permanent capacity during peak periods (slot constraint times and peak seasons noting the seasonal nature of visitor trends).		CWA will offer redundancy in the event of catastrophic fires, structural failures, fuel or power supply interruptions, etc	Such catastrophes could be regional and affect both airports. Jet fuel constraints, if they occur, would potentially have a nation-wide effect and not just affect CTIA and not CWA. Similarly with power outages.	
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38. According to the Draft EIAR and in the context of need and desirability: “The impact of the development of CWA in its role as an alternate for diversion and fuel planning has been assessed as having an immediate and hugely positive impact on airline operations into Cape Town as a whole.” (emphasis added). The benefits outlined above improve and maintain the economic viability of existing routes, as well assist in the realisation of new routes into Cape Town that previously were not viable. This plays a complementary role towards CTIA’s own growth ambitions, as there will be routes that simply would not be feasible to target without CWA complementing the business case of flying to Cape Town, in CWA’s role as a diversion alternate for fuel planning.	EAP response: this is a duplication of a previous comment addressed above.											
39. In the context of an EIA process the foregoing comments (points 38 - 40) use overtly over-the-top language which should have no place in an	EAP response: The comment has been addressed above.											

		independent and objective assessment. The need and desirability component of the Draft EIAR is skewed and balanced in favour of the proposed development, which as mentioned elsewhere, and this is not congruent with and does not meet the objectives and requirements of the need and desirability component of the EIA process.	
		40. Turning to Section 5.3 of the Draft EIAR which deals with sustainability and climate change issues. It is stated that “The development of the CWA, as an official destination alternate, will reduce the distance that aircraft landing in the Cape Town region would need to fly in the event of an emergency, should those flights designate CWA as the destination alternate.” This statement creates the impression that the main purpose of the proposed expansion of CWA is that of a destination alternate to CTIA and therefore serves as the basis for arguing that the infrastructure and amenities available at CTIA must be matched. It is improbable that this is the full picture and that it is such a key motivating factor. The primary driver for the proposed project must surely be business-related factors.	EAP response: Appendix 22 to the amended draft EIAR provides the technical background to the statement quoted. The statement does not create the impression that the main purpose of CWA is to be CTIA alternate airport, neither that the infrastructure or amenities at CTIA should be matched.
		41. There is heavy reliance on the proposed project serving as a destination alternative to CTIA in motivating that it is needed and desirable. This is covered in Section 5.2.2 and then again in Section 5.3 of the Draft EIAR. Tied to this alternate destination ‘imperative’ is the extensive focus on potential benefits from a carbon emission and hence climate change impact perspective.	EAP response: this is a duplication of a previous comment addressed above.
		42. The above needs to be seen in the context of carbon emissions for the Cape Town metropolitan area. According to the IDP, based on 2018 data on CO2e emissions from various sectors, those from aviation made the least contribution (6.2%) with road transport being the highest (27.2%) followed by commercial (22%) and households (17%). Similarly, if emissions per source are considered, jet fuel is the lowest and electricity accounts for over 50% of carbon emissions. This is not to suggest that reduction in emissions from aviation should not be sought, but it is to make the point that in the overall context of carbon emissions, aviation is not a major contributor. Clearly fuel saving benefits are of economic benefit to	EAP response: This opinion based on data from 2018 is noted.

		airlines and ought to improve their individual carbon footprints, with an associated reduction in carbon tax.	
		43. It is important to note that Climate Change Impact Assessment (Appendix 40) does not deal with fuel saving issues or with carbon emissions associated with incoming aircraft as the airport is not the direct source of these emissions. For the operational phase of the proposed project only jet fuel / avgas used for refuelling is included as this would be one of the components of the CWA's Scope 3 carbon emissions. This is due to the fact that the facility would sell the fuel to the aircraft company / operator. In addition, the Climate Change Impact Assessment notes that fuel usage (i.e. sold by CWA to aircraft leaving the airport) is a major contributor to CWA's carbon emissions and hence, its carbon footprint.	Specialist response: The specialist confirmed that the comment is primarily an observation by the I&AP. EAP Response: The CCIA was conducted by an industry leading specialist. The CCIA does deal with fuel savings, and the methodology used to determine Scope 3 emissions was in accordance with the 'Draft National Guideline for Consideration of Climate Change Implications in Applications for Environmental Authorisation, Atmospheric Emission Licenses and Waste management Licenses' and the 'GHG Protocol's Corporate and Accounting reporting standard and the Department of Forestry, Fisheries and Environment's Methodological Guidelines for the Quantification of Greenhouse gas emissions' . The observation by the I&AP does not have a bearing on the findings of the CCIA.
		44. It is important to bear the above facts in mind when considering the benefits that the Draft EIAR emphasises around fuel savings were CWA to serve an alternate destination for CTIA instead of ORTIA or the Gqeberha / Port Elizabeth Airport. Effectively, the nett result of the proposed expansion of CWA is that it will introduce new carbon emissions into the area. What is not clear is how the airport's own emissions correlate to the reduction in carbon emissions attributed to fuel savings where CWA is selected as an alternate airport. In other words, is there a nett gain or a nett reduction in emissions.	CWA Response: CWA appreciates the importance of assessing the net environmental impact of the project as it relates to carbon emissions. In line with this, the project undertook a comprehensive Climate Change Impact Assessment (CCIA) as part of the EIA (Appendix 28), the results of which clarify both the emissions profile of the project and its broader contribution to sustainable aviation in the region. The CCIA covered Scope 1 and 2 emissions (directly under the airport's control) as well as Scope 3 emissions (not controlled by CWA and would take place regardless). Not only did the CCIA consider the fuel reductions enabled by CWA as an alternate, but also the positive impact of reduced vehicular travel on the roads due to the closer proximity of CWA to its potential passengers. All things considered, the CCIA concluded that the project does align with national and global climate goals while ensuring resilience against evolving

			climate challenges. It concluded further that the emissions controlled by the airport are low when compared to the emissions related to fuels burnt by incoming and outgoing flights (Scope 3), which themselves are managed through carbon budgets imposed on airlines under the Climate Change Act. It must also be acknowledged that all infrastructure projects, especially those supporting national and regional connectivity, will generate carbon emissions. This is a recognised and necessary feature of economic development. What distinguishes CWA, however, is the deliberate integration of emissions-conscious design and green technologies from the outset. These include: 1. Solar powered operations 2. On-site water collection, treatment and re-use 3. Provision for Sustainable Aviation Fuel infrastructure (SAF) 4. Green building standards 5. etc
		45. The Draft EIAR states that fuel savings have been calculated, based on a study by PACE Aerospace Engineering & IT GmbH. This study considered each incoming flight per point of origin (international, regional and local) and calculated the fuel saving for an individual flight for that route for each applicable aircraft type. Thus, these calculations provide fuel saving and associated CO2 emission saving per individual flight/aircraft type. Clearly fuel savings depend on the aircraft, flying conditions and the frequency of flights. PACE calculated carbon emissions (CO2) with the factor: 3.16 kg of CO2/kg of fuel for the various aircraft that were considered.	CWA Response: This comment is noted.
		46. It is further stated in the Draft EIAR that a reduction of up to 56 million kgs in CO2 emissions per annum could result. It is not known exactly how this figure was derived and what input data were used. The PACE report did not deal with cumulative CO2 emission savings or reductions: "The report did not directly include a summary or projection of the cumulative CO2 reductions for the purposes of a generalized CO2 discussion, PACE recommends that a generalized CO2 reduction in the range of 3-5% be proffered as the benefit of using CWA as an CPT alternate." This means that predicted fuel reduction and the associated decrease in CO2	CWA Response: The PACE study evaluated individual flight scenarios and published its assumptions and inputs on Page 9 of Appendix 15. This was extrapolated using public data such as CTIA's annual traffic volumes and aircraft types and projected using reasonable inflationary inputs.

		emissions are estimates, based on a number of associated assumptions. At best, the fuel savings are indicative and based on an estimate. The benefit should not be overstated as is the tendency in the Draft EIAR because there are many influencing factors.	The extrapolation, while dependent on input assumptions, is not speculative but rather based on conservative input from PACE, and methodical scaling. PACE assumes average rather than optimal conditions. It is now a confirmed fact that Cape Town International Airport has already exceeded pre-COVID levels of international traffic, suggesting that air traffic growth (and the associated demand for alternates like CWA) is occurring faster than projected. This strengthens the case that the projected fuel and emissions savings are understated, not overstated. In this context, the Draft EIAR presents a reasonable and likely conservative estimate of the environmental benefit offered by CWA's strategic location and function.
		47. An example of fuel saving using the Airbus A350 is used in the Draft EIAR, but this aircraft is not included in the PACE report provided in Appendix 15. No alternative reference is cited and therefore it is not known where the fuel saving figure for this aircraft comes from or how it was derived. It is stated that 7.8 tonnes of fuel would be saved by the Airbus A350 by using CWA as an alternate destination and that payload would increase by a concomitant amount.	CWA Response: The Airbus A350 example in the Draft EIAR was included to illustrate the operational benefit of a closer alternate airport on a real world existing route at the time, which consisted of an A350 from Atlanta (US). The nature of airline operations is that they substitute aircraft regularly based on their own operational and fleet availability at the time. While the PACE report did not model the A350 specifically, it did assess the Boeing 777-300ER which is a comparable long-haul aircraft with similar fuel consumption profile and mission range – in fact the 7.8 tonnes used for the A350 in this scenario is less than the findings for the B777-300ER which actually confirms that CWA made conservative downward adjustments to provide a more realistic assessment. The basket of aircraft and flight missions analysed by PACE is representative of the broader industry and therefore reasonable for demonstration purposes.
		48. The question as to whether an increase in payload (i.e. weight) would offset some of the fuel saving is not explained. Payload is one of the factors that influences fuel requirements, among others - the distance of the flight, the aircraft's fuel burn rate given the payload, and expected weather conditions. Suffice it to say that aircraft fuel burn is influenced by a number of factors.	CWA Response: There are many variables that would impact the fuel burn on an aircraft mission, including weather, distance, payload and even load factors etc.

			The relationship between fuel and payload is addressed in the PACE Diversion Airport Analysis (Appendix 15). As explained in Section 5.1, reduced reserve fuel from shorter diversion distances can either: 1. Be substituted with additional payload (keeping total aircraft weight constant), or 2. Be left unused, thereby reducing total aircraft weight, resulting in lower fuel burn and emissions. It is up to the airline to decide how best to utilise the freed up space, which is why PACE provides a range of results and not a single fixed result per aircraft or route.
		49. It is not clear exactly what parameters and assumptions have been used to determine fuel saving in the case of the proposed project, and therefore how accurate and what level of confidence can be placed on the conclusions drawn. As a result, the stated benefits of fuel saving cannot be taken as a key environmental driver in the context of need and desirability – there are too many uncertainties.	CWA Response: The fuel saving estimates in the Draft EIAR are grounded in detailed modelling conducted by PACE Aerospace Engineering (Appendix 15), using standard industry parameters such as aircraft type, cruise altitude, fuel density, and regulatory fuel reserve requirements. PACE provided per-flight fuel saving data, which informed their formal recommendation of a 3–5% fuel saving range when CWA is used as an alternate. The extrapolation of total annual savings was conducted using inflationary growth projections that were considered conservative at the time. However, Cape Town International Airport has already surpassed pre-COVID international traffic levels, suggesting that actual traffic volumes (and therefore corresponding fuel savings) are likely to exceed forecasts. Therefore, both the modelling and extrapolation are credible and defensible, and the fuel saving benefit remains a valid environmental efficiency driver for the project. Additionally, Appendix 22 (Alternate Airport Study by Munich Airport International) supports the strategic rationale for CWA by highlighting the operational inefficiencies and excessive distances to existing alternates (ORTIA, Gqeberha), which result in unnecessary fuel burn and higher emissions. The study reinforces that the absence of a nearby alternate is both a resilience and environmental gap in the current Western Cape aviation system.

			Taken together, the fuel savings are not speculative but rather the outcome of quantifiable, conservative modelling based on credible industry data from independent industry experts. In this context, they form a valid environmental and commercial efficiency benefit, which appropriately contributes to the project's overall need and desirability.
		50. The notion that CWA will serve a complimentary role to CTIA and thus that overall, more flights will be attracted to Cape Town does not address the question of associated carbon emissions. In other words, the much-vaunted fuel savings and associated reduction in CO2 emissions does not appear to have taken account of the increase in air traffic associated with CWA. It is stated that once fully operational, some 200 flight movements will take place each day. This does not appear to have been accounted for in the fuel-saving / CO2 emission reduction calculations.	CWA Response: The fuel savings and carbon emission reduction figures referenced in the Draft EIAR relate specifically to the scenario when CWA is selected as an alternate for fuel planning. This scenario reflects the efficiency gained when CWA is used as a nearby alternate to Cape Town International Airport (CTIA), rather than the existing more distant options. These estimates are not intended to represent total project emissions, but rather a specific operational improvement. The broader emissions associated with increased air traffic at CWA, including the projected 200 daily flight movements, have been addressed separately in the Climate Change Impact Assessment (Appendix 28). That report quantifies total Scope 1, 2, and 3 emissions through to 2050, and confirms that even at full capacity, CWA's emissions represent less than 0.1% of South Africa's national carbon budget. Appendix 28 further highlights that all infrastructure projects, especially those supporting national and regional connectivity, will generate carbon emissions. This is a recognised and necessary feature of economic development. What distinguishes CWA, however, is the deliberate integration of emissions-conscious design and green technologies from the outset. In summary, the diversion-related fuel savings highlight a clear and measurable system efficiency. It demonstrates how CWA can support more efficient, lower-emission flight operations in the region.
		51. Whilst much is made of the fact that having the two airports will save fuel due to their close proximity to each other, serving as alternates for each other (instead of ORTIA), the extent to which this benefit will be offset through the introduction of additional flights into Cape Town has not been explained. In fact, the following is stated: "The site has already been part	CWA Response: It is acknowledged that CWA may accelerate regional air traffic growth. However, it is incorrect to imply that this growth is inherently negative simply because it involves increased fuel consumption.

		of the community for over 80 years. Expanding an existing airbase, already zoned for transport, represents the continuation and enhancement of an existing use.” This may be enhancement from the perspective of the owners of CWA, but this comment completely downplays and ignores the concerns of the local community about the effects of this ‘enhanced’ facility on their place of living – their homes. Thus, the requirement to consider the views of local communities, including potential future residential communities (in accordance with land use planning set out in the CoCT MSDF and the Northern District Plan) have been ignored.	This economic growth is not only desirable - it is essential. This benefit is not limited to existing flights but applies to all future flights that plan CWA as an alternate. As air traffic grows in line with current trends (already evidenced by CTIA exceeding pre-COVID international levels) this per-flight efficiency becomes more significant at scale. Rather than being offset by growth, the relative efficiency gain per flight remains valid, meaning that increased volumes will compound (not cancel) the operational and environmental advantages offered by CWA’s proximity. All community members have been given the opportunity to register as IAPs and raise any concerns during the public participation processes. Communities have also expressed their positive support and endorsement for the development, noting the positive socio-economic benefits of the proposed expansion. All IAPs have been given a chance to comment, and those comments were considered and responded during each of the four PPP rounds.
		52. The claims that the proposed project will contribute to the achievement of the Sustainable Development Goals is substantially overstated, which effectively results in the proposed project masquerading as something that it is not. This is shown in the following table.	EAP response: The comment is noted. SDG 1, 2, 3 & 4 (Reduction in poverty, hunger and increase in health, well-being and education) – it is a misunderstanding of the IAP that many employment opportunities will require only skilled labour. Ongoing engagement with the Fisantekraal and Klipheuwel communities regarding job creation, skills development and education. The project is concerned with food security, and it is an aspect that is evaluated in the Agro-ecosystem IA. The SDG 2 also refers to hunger, which is a result of unemployment, and is at very high rates in South Africa at present. To say that CWA will not have an effect on the general levels of employment, hunger in surrounding communities, improved health and well-being within these communities and education and skills development is disingenuous. SDG7 - Less reliance on Eskom supply translates to more available supply to the local area. At this point CWA is not including the feedback into the grid or

WHAT THE SDG STATES	WHAT THE DRAFT EIAR STATES	THE REALITY
SDG 1: End poverty in all its forms everywhere. People living in extreme poverty are unable to meet their basic needs. This will necessitate concerted action and investment to enhance economic opportunities, improve education and extend social protection to all. SDG 2: End hunger, achieve food security and improved nutrition and promote sustainable agriculture. This will necessitate transformation in food systems, investment in sustainable agricultural practices, and improvement in nutrition and food security. SDG 3: Ensure healthy lives and promote well-being for all at all ages. This SDG includes a commitment to end the epidemics AIDS, tuberculosis, malaria and other communicable diseases Increased investment in health systems will be required to achieve universal health coverage, and provide access to safe and affordable medicines and vaccines for all. SDG 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all To achieve this SDG, it is recognised that education financing must become a national investment priority. Implementation of measures such as free and compulsory education, increasing teacher numbers, improving basic school infrastructure and embracing the digital transformation are essential. SDG 7: Ensure access to affordable, reliable, sustainable and modern energy for all This SDG is concerned with universal access to affordable energy. The focus is on people who do not have access to electricity. This is to be achieved through expanding infrastructure, upgrading technology to provide clean energy. Electrification must be accelerated through investment in renewable energy and in energy efficient technologies.	SDGs 1, 2, 3 and 4: The project aims to create jobs for breadwinners, resulting in the ability for households to have nutritional food on the table and for the youth to be educated In relation to SDG 1 – whilst every job opportunity for unemployed persons is important as there is an associated potential for an improved quality of life, it is unlikely that the proposed CWA will offer significant relief in this regard. Many employment opportunities are likely to require skilled persons with experience in the aeronautical industry. The proposed project is not concerned with social protection. In relation to SDG 2 – the proposed project will have no impact since it is not concerned with food security, food production systems and the like. In relation to SDG 3 – it cannot be argued on any serious or credible basis that the proposed project will contribute to improved health care. In relation to SDG 4 – it is unfathomable as to how the proposed project can be seen to contribute to this SDG as it is wholly unrelated to education provision. The proposed project aims to produce its own renewable energy through solar PV and a biodigester. These forms of energy do not result in emissions or waste products and compare favourably in terms of cost with Eskom supply.	It is hard to comprehend that such a nonsensical rationale for arguing that the proposed project supports SDGs 1-4, would find its way into an EIA process. The suggestion that the proposed project is aligned with and will contribute to SDGs 1-4 is to stretch credulity. In relation to SDG 1 – whilst every job opportunity for unemployed persons is important as there is an associated potential for an improved quality of life, it is unlikely that the proposed CWA will offer significant relief in this regard. Many employment opportunities are likely to require skilled persons with experience in the aeronautical industry. The proposed project is not concerned with social protection. In relation to SDG 2 – the proposed project will have no impact since it is not concerned with food security, food production systems and the like. In relation to SDG 3 – it cannot be argued on any serious or credible basis that the proposed project will contribute to improved health care. In relation to SDG 4 – it is unfathomable as to how the proposed project can be seen to contribute to this SDG as it is wholly unrelated to education provision. Whilst it is intended to install renewable energy that will provide some of the power needs of the proposed project – this is for own use. Thus, it cannot on any reasonable and rational grounds be claimed that the proposed project contributes to a SDG that is concerned with equitable access to affordable energy. This claim is wholly inappropriate and takes away from the real intention of SDG 7. Misrepresentation of the intention of the SDG so as to serve private interests has the effect of belittling and devaluing an extremely important global poverty alleviation goal.

WHAT THE SDG STATES	WHAT THE DRAFT EIAR STATES	THE REALITY
SDG 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all This requires, among others, an increase in employment opportunities, especially for young people, reduction in informal employment and labour market inequality and promotion of safe and secure working environments, and improved access to financial services to ensure sustained and inclusive economic growth. In addition, a wholesale reform of the financial system is needed to tackle rising debts, economic uncertainty and trade tensions. SDG 11 - Make cities and human settlements inclusive, safe, resilient and sustainable. Rapid urbanisation which outpaces the development of housing, infrastructure and services leads to a rise in slums or slum-like conditions. Addressing these issues necessitates access to safe and affordable housing, upgrading of slum (informal) settlements, investing in public transport, creating green spaces, and improving urban planning and management in a way that is both participatory and inclusive. SDG 12: Ensure sustainable consumption and production patterns This SDG deals with issues such as fossil fuel subsidies offered by governments and loss of food (i.e. wastage) after harvest along the supply chain from farm to consumer. Patterns of production and consumption need to change to prevent waste of resources and more efficient use of resources. This is key to sustaining the livelihoods of current and future generations. SDG 13: Take urgent action to combat climate change and its impacts It is noted that the effects of climate change could lead to mass migrations, instability and wars. In addition, higher human mortality rates are being experienced from floods, droughts and storms. This situation can only be addressed through implementing affordable, scalable solutions that are available to enable countries to leapfrog to	SDG 8 (Decent Work and Economic Growth) The project aims to be positioned as an 'airport city' and notwithstanding the additional flights that can be accommodated in the Western Cape the focus on non-aeronautical revenue on the landside, such as commercial and property development opportunities, can create job opportunities and economic growth for the region. SDG 11 (Sustainable Cities and Communities): The proposed project aims to be a sustainable and a green airport, and by embracing renewable energy and reducing carbon emissions, the airport can contribute to the development of sustainable and resilient cities and communities SDG 12 (Responsible Consumption and Production) The proposed project emphasises sustainable practices and reduction in the amount of reserve fuel, and promotes responsible consumption and production, allowing the airport to reduce its environmental impact as well as support the reduction in global aviation fuel consumption. SDG 13 (Climate Action) - The proposed project aims to reduce its carbon footprint and include renewable energy which will support this goal both on a local and international level.	The proposed project can claim to create jobs that would be considered as falling into the category of 'decent work' – it would provide formal employment and what is likely to be a secure working environment. Beyond that, it is unlikely to be relevant to this SDG. The proposed project is not concerned with housing provision, upgrading informal settlements, providing green spaces or providing public transport. Accordingly, it cannot be claimed that it is aligned to or contributes to this SDG. It is improbable that the proposed project will contribute to this goal because it is concerned with providing a travel service that consumes fossil fuels. The benefit of the purported reduction in aviation fuel consumption (reduction in reserve fuel) is overstated and overstated, since it is closely linked to an infrequent occurrence of providing an alternative landing option if an aircraft due to land at CTIA cannot do so. Whilst the use of renewable energy does serve to reduce the carbon footprint of an operation, this cannot be framed as 'urgent action to combat climate change.' It is improbable that reducing CWA's carbon footprint will have a measurable impact on a local level and even less so on an international level. What is not mentioned in the discussion on this SDG in the Draft EIAR, is that air travel is dependent on fossil fuels.

a link to CoCT supply for future supply of surplus energy, but this option remains open.

SDG 8 – The comment is noted. Skilled and unskilled labour will be required, and formal and informal employment opportunities will be the generated.

SDG 11 – The CWA aims to be a airport city, aligning with the sustainable city goals of CoCT.

SDG 12: The proposed use of CWA as alternate airport to CTIA results in reduction in the amount of reserve fuel and emissions (Appendix 22 of the amended draft EIAR).

SDG 13 – The Climate Change IA (Appendix 28) reiterates the benefits of renewable energy usage, reduced resource usage, designing the CWA with Climate Change in mind (Architectural Guideline appended to the EMPr).

		cleaner, more resilient, and low-carbon economies. As climate change is a global challenge, it requires international cooperation.	The implications of encouraging an increase in air travel could be seen as contrary to this SDG.	
	52.1. Key points in summary	EAP response: this comment has been addressed.		
	The Draft EIAR does not meet the requirements of the 2014 NEMA EIA Regulations in respect of need and desirability. Accordingly, important decision-making information is absent. A clear evaluation of whether the proposed project can be considered as ecologically sustainable and socio-economically justifiable does not emerge from Section 5 of the Draft EIAR, which deals with need and desirability. In summary:			
	53. Need and desirability is skewed and shows bias in that it focuses on issues that show the project in a positive light. The implications / impacts of alignment or otherwise with strategic plans and policies is not presented in a balanced fashion. Emphasis is placed on those aspects that place the proposed project in a positive light. The level of commonality between the benefits espoused by the Applicant is disconcerting to see in an EIA process. Similarly, the level of copying and pasting from Appendix 36 is also troubling. These factors point to a low-level of engagement, critical analysis and interpretation of information in the environmental context.	EAP response: this comment has been addressed.		
	54. There is a heavy reliance on the economic benefits of the proposed project to demonstrate that it is both needed and desirable. What is not addressed is the counter to this – the social costs. Who will bear the social costs of the introduction of new risk factors into the environment, such as noise. Aircraft noise is not only concerned with the loudness of emissions. International research shows that significant health effects are associated with this noise. Further detail on this issue is given in Section 3 of this report. This means that there is a significant risk that the right to an environment that is not harmful to health or wellbeing of affected individuals and communities could be materially compromised.	CWA Response: It is important to note that none of the specialist reports indicate or conclude that the right to an environment that is not harmful to the health or wellbeing of affected individuals and communities will be materially compromised. Where risk factors are being introduced, they are within acceptable and manageable parameters and the specialists have provided and recommended suitable mitigation measures.		
	55. Extensive emphasis is placed on the environmental benefits associated with fuel savings due to the potential for an expanded CWA to serve as an alternative destination for flight planning purposes. The result is aircraft	CWA Response: The emphasis on fuel savings and associated carbon reductions is both appropriate and well-founded. These savings are based on detailed aircraft		

		would need to carry less fuel, which would result in reduced carbon emissions. There are a number of uncertainties and assumptions associated with this 'environmental benefit' which are not made clear. The emphasis or weight placed on this issue is out of proportion, even just considering a simple metric such as the amount of space dedicated to the subject of CWA serving as an alternative airport and associated fuel saving. Of the 44 pages that make up Section 5 of the Draft EIAR34, 16 are related to this issue and there is not even one page in which the introduction of risk factors into the community (current and future residential areas) such as noise is discussed specifically in relation to the proposed project. This is despite the fact that reference to the CoCT MSDF recognises aircraft noise as a concern; the noise risk contour limitation mentioned in the CoCT MSDF is not discussed in Section 5.	performance modelling by PACE Aerospace Engineering (Appendix 15), which confirmed that a 3–5% fuel saving is a reasonable general benefit when Cape Winelands Airport (CWA) is used as an alternate to Cape Town International Airport (CTIA). This is a significant and scalable system efficiency which has been corroborated through support from industry. As air traffic continues to grow, this per-flight improvement compounds into a measurable environmental and operational benefit. This is supported by findings from the Munich Airport study, referenced in Appendix 22, which demonstrated that shorter alternate distances on long-haul routes can reduce fuel uplift requirements, lower operational costs and increase payload capacity. Airlines also benefit from reduced carbon emissions, which increasingly impact bottom lines through mechanisms like carbon taxes and emissions trading schemes. These efficiencies are not just environmentally relevant but are commercially material, especially considering how thin the profit margins are for airlines (which is a well-known fact, published annually by global aviation bodies like IATA (International Air Transport Association)). In this context, and considering how important economic growth is, the weight given to this issue in the EIAR is both proportionate and relevant to the project's need and desirability On the matter of community risks, such as aircraft noise, these have not been ignored. A dedicated Noise Impact Assessment (Appendix 16) was conducted in accordance with South African noise standards (SANS 10103).
		56. About Alternatives The consideration of alternatives in the EIA process is intended to seek out 'least environmental harm' options which may be available through location, layout and technology, among other factors. Furthermore, applying a sustainability-led EIA process means that alternatives need to be evaluated in the context of sustainability objectives and targets. This means taking cognisance of the various issues / questions, as relevant to the proposed project, as set out in the need and desirability guidelines mentioned in Section 2 of this report. Put differently, the	EAP response: this comment has been addressed. The development of Alternatives, the impact assessment and the mitigation proposed has been in consultation with and with input from IAPs from the outset. The development of and assessment of alternatives has followed the NEMA process and reacted to stakeholder input on various aspects (Biosecurity, noise mitigation, visual mitigation, groundwater management, terrestrial and freshwater offsets, amongst others).

		questions in the need and desirability guidelines ought to be kept in mind when formulating alternatives and comparatively assessing them, so as to lead to identification of the 'best fit' option, based on sustainability criteria. The alternative that will best give effect to sustainability targets, will not exceed thresholds of acceptable change and that has the lowest adverse environmental and social impacts would typify the most appropriate option.	
		How the question of alternatives has been addressed in the Draft EIAR	-
		57. Alternatives are dealt with in Section 8.1.2 of the Draft EIAR. This entire discussion, which spans nearly nine pages, is wholly concerned with the reasons (i.e. justification) for only considering one site location, namely the current CWA site. Other options, such as alternative layouts or development footprints are not mentioned or considered.	EAP response: this comment has been addressed.
		58. The consideration of alternatives is inadequate. Two options are addressed "No go" (described as "do nothing") or proceed with the proposed development. The initial Draft EIAR referred to 3 alternatives and then provides an explanation as to how Alternative 2 fell away, and how Alternative 3 became the preferred alternative. This alternative has been adjusted in some respects to now become preferred Alternative 4. The entire explanation is wholly confusing and effectively Alternatives 2, 3 and 4 are variations of essentially the same development proposal. These alternatives (2, 3 and 4) do not differ from each other in any material way. It is a moot point as to whether the drivers behind the changes made, which have resulted in Alternative 4, are environmental in nature.	EAP response: this comment has been addressed.
		59. "Further comments received from I&APs during the EIA Phase informed amendments to the various technical and specialist reports and are addressed in the amended EIAR." Despite this claim it is then stated: "Due to the minor changes to the SDP and the project description for Alternative 4 (The Preferred Alternative), the specialists tended to rate it as similar to Alternative 2 and 3." There is only one conclusion to be drawn and that is that the changes made to 'Alternative 3' thereby resulting in 'Alternative 4' were not driven by the imperative to avoid or further reduce adverse environmental impacts. Had this been the case, then the EAP ought to	EAP response: this comment has been addressed.

		have listed the environmentally related rationale for the changes made. As this has not been done, the only realistic explanation is that technical feasibility and / or cost factors have come into play, thereby necessitating these changes. A possible exception is the removal of chicken manure for use in the biodigester due to biosecurity concerns from the neighbouring chicken farm.	
		60. There appears to be a material misconception by the EAP about the purpose behind considering alternatives in an EIA process. It is not the intention to derive a 'new' preferred alternative each time incremental modifications to the proposed project are made, as is the case here. As per the 2013 DEA&DP Guideline on Alternatives, the primary objective must be to avoid all negative impacts, rather than to minimise them. Due to the lack of genuine identification of alternatives, such as a downscaled version of the proposed expansion, this primary objective has not been met. Instead, extensive effort has been placed on justifying the site location and the size of the development.	EAP response: this comment has been addressed.
		61. The Draft EIAR states that "Alternative 3 was amended to exclude chicken manure to the biodigester; to remove wind energy; to include both sewer to onsite treatment and Fisantekraal WWTW; to include the additional borehole drilled; to amend the SDP to show the incoming potable line from the southwest, the extension of the fuel line into the GA area and to make minor amendments to internal precinct boundaries. This resulted in the New Preferred Alternative 4 which was assessed in this amended draft EIAR." Except to say that the impacts and their significance have not altered materially (i.e. adverse impacts have not reduced in significance, for example). This begs the question as to whether Alternatives 3 and 4 are genuine alternatives aimed at avoiding adverse impacts. It seems that they are modifications or variations of the essentially the same scheme.	EAP response: this comment has been addressed.
		62. The purpose of formulating alternatives is not to equate modifications in a project proposal with a 'new preferred alternative' thereby creating the false impression that notable / material changes have been introduced to avoid adverse environmental impacts. Incremental modifications, as has taken place in this case do need to be documented so as to ensure there	EAP response: this comment has been addressed.

		is a complete and accurate description of the proposed project. If an incremental modification results in a new impact or changes the nature of an existing impact, this must of course also be noted.	
		63. It is not clearly specified as to whether these changes that were made to Alternative 3 were due to environmental impact factors or due to technical feasibility issues. The relative advantages these changes offer from an environmental impact perspective, are also not described, with one possible exception. This is the change from using chicken manure in the biodigester due to biosecurity concerns raised by the neighbouring County Fair facility. The fact that incremental modifications have occurred, as opposed to genuinely different alternatives is shown by the fact that significance ratings have not been influenced by these changes. Issues such as extending a fuel line would not seem to offer any environmental advantage and may in fact expand the potential risk area insofar as fuel leaks are concerned. The risk results in the Major Hazard Installation study may also be affected.	EAP response: this comment has been addressed.
		64. It is stated in the Draft EIAR that: “Early in the process under the Scoping Phase, the location alternative was considered, but based on the below factors assessing other location alternatives were scoped out, considering that the application site is the only reasonable and feasible location alternative.” No description of which locations were considered; neither is any explanation as to why they were rejected provided. An obvious question is that if location alternatives were indeed considered, why was this information not provided in the initial Draft EIAR dated November 2024? This information is also not provided in the updated Draft EIAR. According to the 2013 DEA&DP Guideline on Alternatives “The identification of alternatives should be broad, objectively done and well documented.”	EAP response: this comment has been addressed.
		65. It is notable that the Draft EIAR has unsubstantiated statements to support the selection of the Fisantekraal location. “While originally designed for wartime aviation, the site was also selected with future expansion in mind, making it a long-term asset for aviation infrastructure.” In the absence of reference to credible research that provides irrefutable proof of this	EAP response: this comment has been addressed.

		contention, it stands to be rejected as a further measure (in addition to those already mentioned in Section 2 of this report) employed by the EAP to place the project in a favourable light.	
		66. The alternative of improving or upgrading the CWA, based on the existing facilities is also a reasonable and feasible alternative, but this has not been considered. This could enable the general aviation activities to operate safely and efficiently, without taking up capacity at CTIA.	EAP response: This comment has been addressed. Only reasonable and feasible alternatives were assessed. The IAP is making a statement on what would be reasonable and feasible, what would be required to be in place for general aviation from CTIA to operate safely and efficiently, without any scientific basis for this statement.
		67. An alternative layout, or adaptations to the layout, including a decrease in the development footprint have not been considered. This is a particular concern of a neighbouring chicken farm, which relates to the proximity of landside operations to the boundary of the property. For example, a reduced footprint would enable an increased buffer to be provided between the CWA site and the chicken farm.	EAP response: this comment has been addressed.
		68. A range of technical reasons for selecting the site are given. Turning to those offered from an environmental perspective, various problematic statements arise:	-
		a) Firstly, as regards noise, it is claimed that "Best practice in airport planning dictates that airports should be located on the periphery of urban development to limit noise disruption to residential areas." It then goes on to say: "The Cape Winelands Airport (CWA) is strategically positioned along the Urban Edge, with the majority of its surrounding land being agricultural. This natural buffer zone significantly reduces the number of people affected by aircraft noise compared to airports located within densely populated areas." ³⁸	EAP response: this comment has been addressed.
		b) The above statements, the latter in particular, amounts to playing fast and loose with the facts. It totally ignores the concerns that have been raised about noise by farming enterprises (e.g. County Fair to the west	EAP response: this comment has been addressed.

		of the CWA site, a resident that runs a parrot rehabilitation facility etc.). It also completely ignores the spatial planning imperatives shown in the CoCT MSDF, where it is clearly evident that residential development is to take place in several locations in close proximity to the CWA site, including directly adjacent to its southern border. This has associated land use compatibility issues.	
		c) Moreover, the Fisantekraal community, which is located to the south-west of the CWA site is growing, as is evident from viewing the area on Google Earth. This community is approximately 1.5 kms away from the south-western corner of the CWA site. Other communities which are also growing, such as Kraaifontein and Uitzicht are located around 5-6 kms to the south-west. Furthermore, there are several small holdings to the south and east of the CWA site. It is questionable as to whether this is compatible with the proposed CWA development, even if it theoretically means that fewer people would be exposed to noise in these more rural settings.	EAP response: this comment has been addressed.
		d) Having made the claim described in point (a) above, a comparison with the location of CTIA is made, including the implications of its proposed new runway realignment. "Many of these communities were previously not directly affected by high-intensity aircraft noise but will now fall within newly established noise exposure zones, requiring potential noise mitigation measures. In contrast, the CWA site benefits from minimal residential encroachment and fewer noise-sensitive receptors, significantly reducing the overall impact of airport operations on surrounding communities. This positioning ensures that CWA can operate as a high-capacity airport while minimizing noise-related disruptions, aligning with modern urban planning and aviation best practices."	EAP response: this comment has been addressed.
		e) Firstly, since a location close to CTIA is not under consideration as an alternative by CWA, the comparison with CTIA is irrelevant. It is contended that the sole purpose of raising CTIA in this context, is to place the CWA project in a favourable light. Secondly, based on spatial plans for the Fisantekraal area, it is quite clear that additional	EAP response: this comment has been addressed.

		residential development is envisaged and this poses the risk that CWA could face exactly the same difficulties regarding noise as the Draft EIAR states CTIA is currently facing. Thirdly, most of the aforementioned communities and planned residential areas are located on the southern side of the CWA site, which is likely to be the most common approach route of the aircraft. Higher noise emissions closer to the ground are associated with aircraft landing approach (as does take-off), than during the flight itself.	
		f) It should also be noted that the statement that CWA is “strategically positioned along the Urban Edge” is stretching the truth. The existing CWA facility and part of the area for the proposed expansion falls within the urban edge, with the remainder outside the urban edge in an area designated as Discouraged Growth Area in the CoCT MSDF.39	EAP response: this comment has been addressed.
		69. The Noise Impact Assessment discusses three scenarios. Scenario 1 does not correlate with the ‘no go’ / ‘no development’ alternative described in the Draft EIAR. The base case (Scenario 1) the Noise Impact Assessment uses is one of full operation of all four of the existing runways at the CWA site. This is clearly not the current situation.	Specialist response: The comment is a duplication. Scenario 1 in the NIA is entirely consistent with accepted EIA practice: a "No-Go" scenario must reflect the <i>lawful, full utilisation</i> of existing infrastructure—not merely current activity levels. Cape Winelands Airport has operated lawfully since 1943 and maintains four intersecting runways. All four are legally usable and have been in use, even if some are used more frequently than others. Scenario 1 therefore reflects the maximum permissible use under existing lawful rights—not a hypothetical. This is both accurate and appropriate. Dismissing it as misleading undermines the EIA's requirement to assess the worst-case baseline under lawful operation. The scenario is not intended to reflect today's operations, but the <i>full legal potential</i> of the existing airfield, which remains valid under South African environmental law.
		70. The ‘fully operational using all four runways’ scenario has not been applied as a base case (i.e. ‘no go’ option) in any other context besides noise.	Specialist response: as above.
		71. The explanation offered by the EAP in the Comments and Responses Report (CRR) is: “In the event that we are not successful with our EIA application to expand and upgrade the airport we will fall back on the	EAP response:

		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.”⁴⁰	Note the quote from the C&R was by CWA and not the EAP. The comment has been addressed. Specialist response: This comment is a duplication. The explanation in the Comments and Responses Report reflects a factual and lawful fallback position in line with NEMA principles. CWA has existing infrastructure and lawful use rights dating back to 1943. As such, Scenario 1 must reflect the full legal operational capacity of the site if no expansion proceeds. Anything less would mislead stakeholders and understate the environmental implications of the “No-Go” alternative. Moreover, referencing the Beechcraft 1900 as the largest currently used aircraft is misleading. The noise modelling is not based on actual use today, but rather on the maximum throughput permissible under the current airfield configuration. This ensures an apples-to-apples comparison with the expanded scenario. It is not a “threat,” but a rational, worst-case baseline, in accordance with standard EIA methodology and the precautionary principle.
		72. The only reasonable and logical explanation for including this ‘worst case’ scenario as a base case is to position the proposed development more favourably, on a comparative basis, from a noise impact perspective. A fully operational scenario based on current facilities is not the actual situation at present at the site. Only two runways are in operation, a third is used as a go-cart track and the fourth is not utilised at all. Using this ‘full operation of all 4 runways’ base case in the Noise Impact Assessment is a misrepresentation of the current factual operating situation.	Specialist response: This comment is a duplication. CWA response: The No-Go alternative in an EIA is not based on current usage but on the maximum permissible use of existing rights and infrastructure. This is aligned with the Department of Environmental Affairs and Tourism’s guidance on alternatives in EIA, which defines the No-Go alternative as the continuation of the lawful status quo—not temporary underuse. The fact that only two runways are used more frequently today does not negate the operational availability and legal right to use all four runways. The infrastructure exists, is maintained, and has been used historically for general aviation and training purposes. The other runways remain serviceable and can be activated without further environmental approvals.

			It is thus accurate and appropriate to model the No-Go scenario on the maximum operational capacity of the site. To do otherwise would artificially skew the comparative analysis, undermining the integrity of the assessment process. Far from being a distortion, this methodology provides a conservative and realistic benchmark against which the impacts of the proposed development can be fairly assessed.
		73. It therefore follows that a baseline that is more favourably disposed to the 'expanded CWA' scenario (i.e. the proposed development) is likely to downplay and underrepresent the associated noise impact.	Specialist response: Using the maximum operational capacity of the existing airport as the Scenario 1 baseline is consistent with EIA norms. The baseline must represent a valid "No-Go" alternative, which by definition includes the full legal rights and infrastructure already in place, not the current underutilisation of those rights. This approach ensures transparency about what could legally occur if the project is not approved, providing stakeholders and decision-makers with a realistic and precautionary benchmark. It would be misleading—and potentially unlawful—to use a constrained or artificially limited baseline simply to inflate the impact of the proposed development. Rather than downplaying noise impacts, this comparison accurately reflects the legal fallback scenario, allowing I&APs to compare both the status quo maximum lawful use and the proposed project on equal footing. This is an objective and reasonable methodology, not a pro-development bias.
		74. The above approach as described in points 69-72 is considered to be wholly flawed from an EIA process perspective and is rejected with the disdain it deserves. It is also deemed to be a material manipulation of the EIA process, affecting the credibility thereof adversely.	Specialist response: The use of Scenario 1 in the NIA as the base case reflects the full lawful operational potential of the site, consistent with what is permissible under existing infrastructure and aerodrome rights. This includes all four legally constructed and technically usable runways at Cape Winelands Airport, which pre-date NEMA and do not require new environmental approval to operate. This is designed to provide I&APs and authorities with a realistic worst-case noise envelope. If the application to expand CWA fails, the airport can still legally escalate operations on the existing footprint. Ignoring this fallback

			would understate the true noise context and create a false impression of the relative impact of the proposed development.
		75. Given that fully operationalising the existing CWA facility is feasible – this must be so as it is given as the fall-back position if not all required approvals are obtained - then this ought to have been included as a reasonable and feasible alternative for assessment. In fact, in accordance with the requirements of the EIA Regulations, this ‘fully operational as is’ alternative must be assessed, including across all of the specialist study areas. This is because of the potential for different impacts and / or the nature and level of impact on environmental attributes to vary relative to the ‘no go’ option that has been used in all areas except noise. The Noise Impact Study needs to be updated to include the same ‘no go’ alternative as has been applied in all the other specialist studies.	Specialist response: This comment is a duplication. The suggestion that the “fully operational as-is” scenario must be assessed as a separate alternative across all specialist studies misunderstands its role in the EIA. The ‘No-Go’ option already incorporates this scenario where relevant and lawful. For noise, it was appropriate to reflect maximum permissible use under existing rights to ensure a precautionary and legally grounded comparison. However, for other themes such as biodiversity or socio-economic impacts, where the current infrastructure’s use has remained for decades, applying a maximum theoretical throughput would be misleading and distort real impacts. Rights to operate under this fall-back position are already entrenched and are not in need of an EIA. Including a full-scale operationalisation scenario in every specialist study would not yield meaningfully different or more accurate results, especially as the existing infrastructure is limited (e.g. no terminal, firefighting services, or commercial capacity). In short, no rational decision-maker would view this fallback as a truly feasible or likely development path without major upgrades—hence its limited relevance outside of noise modelling. The assessment as structured is legally and methodologically sound.
		76. Since this fall-back position would require all four runways to be suitable for use, this begs the question as to what is required to achieve this level of operation. According to data provided in the Noise Impact Assessment, it involves around 300 flight movements per day. Logic suggests that upgrading of some sort would be required, because if this were not the case, then surely all four runways would be in use now instead of only two, with a third serving as a go-cart track and the fourth out-of-use.	EAP response: this comment is a duplication and has been addressed above.

		77. It is quite clear that besides the three alternatives already mentioned (i) the ‘no go’ = current operating and infrastructure situation; (ii) the preferred Alternative 4 = expansion of CWA and (iii) a fully operational CWA facility (all 4 runways in operation), there are other alternatives that ought to have been considered. The most obvious is that of a scaled down version of the proposed expansion development.	EAP response: this comment has been addressed.
		78. The claim that “CWA must have a fully operational 3.5 km runway from Phase 1 to achieve CWA’s core objectives....” bears scrutiny. One of these objectives is to serve as “a diversion and fuel planning airport for inbound flights to CTIA.” This claim is regarded as being over-stated. Put differently, it is not an absolute necessity that CWA cater for all possible aircraft that fly into CTIA (now and in future) to serve as an effective alternate destination airport. Moreover, it would seem improbable that this is the sole rationale for installing a 3.5 km runway.	CWA Response: The suggestion that the 3.5 km runway requirement is “over-stated” overlooks both the operational logic and the regulatory framework within which CWA is being developed. No airport—CWA included—would invest in a runway longer than necessary. Runway length is driven by specific aircraft performance requirements, topographical constraints, safety margins, and the intended role of the airport. To imply otherwise is counterintuitive and misinformed. The proposed 3.5 km runway is not arbitrary. It reflects the minimum requirement to safely accommodate wide-body, long-haul aircraft under varying weather and load conditions. This is essential if CWA is to serve as a reliable diversion and fuel planning alternate to CTIA, particularly for international flights governed by ICAO Annex 6 requirements. Without this capability, the airport would not meet the operational or regulatory thresholds to fulfil this core objective. Moreover, this runway length is foundational to the long-term strategy of supporting air cargo growth, international connectivity and the broader regional economic vision. To propose a shorter runway at Phase 1 only to extend it later—while technically possible—would be economically inefficient, environmentally disruptive and operationally risky. The design is therefore right sized from the outset to meet foreseeable demand and regulatory standards, not inflated beyond what is necessary. In summary, the 3.5 km runway is a deliberate, justified and an essential element of the CWA development strategy. It aligns with best practice and ensures the airport’s credibility, safety case and future viability from day one.
		79. The above point is supported by the fact that Lanseria serves as a destination alternate for ORTIA for a range of aircraft, but not all aircraft.	CWA Response:

		Notwithstanding, it fulfils an important function in this regard. This points to the fact that a down-scaled version of the proposed CWA expansion is an alternative that ought to have been identified and subjected to a comparative assessment in the EIA process.	The reference to Lanseria as a precedent for a “downscaled” alternative ignores a fundamental operational limitation: Lanseria cannot accommodate Code F aircraft due to its insufficient runway length. In fact, international long-haul flights to OR Tambo that require an alternate airport are currently using King Shaka in Durban—not Lanseria—precisely because Lanseria’s runway is too short to handle fully loaded Code F aircraft under diversion conditions. This underscores the very point CWA is making: a credible alternate must be operationally capable of handling the same aircraft types as the primary airport it supports. Anything less compromises safety, planning integrity, and regulatory compliance with ICAO Annex 6 requirements. A downscaled version of CWA, with a shorter runway, would replicate the very shortcomings that limit Lanseria’s utility. It would not meet the minimum technical specifications required for a proper diversion airport for CTIA-bound international traffic, nor would it support the long-term objectives for cargo, connectivity, and regional economic growth. Therefore, the proposed 3.5 km runway is a necessity grounded in current aviation realities.
		80. The emphasis or insistence that the proposed CWA expansion must include a 3.5 km runway in Phase 1 in order to meet the destination alternate requirements for CTIA is questioned. CTIA cannot currently cater for large, wide body aircraft of the size of the Airbus A380 (for example) and will only do so once the planned realigned runway has been constructed. Even when this runway is complete at CTIA, this does not necessarily mean that a destination alternate airport in close proximity will be preferred. The reasons are varied. Flight planners may decide to specify ORTIA because it may be the closer option (for long haul flights which use larger aircraft such as the Airbus A380) when entering South African airspace. Also, if landing at CTIA is not possible due to weather conditions, landing at CWA is also likely to be precluded.	CWA Response: The inclusion of a 3.5 km runway in Phase 1 of the CWA expansion is both operationally and strategically justified. Long-haul wide-body aircraft such as the B777, A350, and B787 require runway lengths in this range for safe landing under diversion or emergency conditions, particularly when arriving with higher fuel reserves. This infrastructure is therefore essential for CWA to serve as a viable alternate to CTIA in compliance with ICAO flight planning requirements. While the Airbus A380 is referenced in the comment, the runway justification is not based on accommodating this aircraft alone. The requirement applies broadly across current and future long-haul fleets expected to serve Cape Town. A runway length of 3.5km was considered a conservative distance based on industry feedback and further validated in Appendix 22 (Alternate Airport Study).

			The suggestion that airlines may still prefer OR Tambo (ORTIA) as a closer alternate (than CWA) is factually incorrect considering that CWA is 25km away from CTIA versus ORTIA at 1270km away from CTIA. As detailed in the Alternate Airport Study by Munich Airport Consulting (Appendix 22) alternate airports located near the intended destination offer significant operational and commercial advantages (including lower fuel uplift, reduced emissions and improved aircraft utilisation). These advantages are material in airline decision-making. Concerns about shared weather conditions between CTIA and CWA have also been specifically addressed. The Alternate Airport Study (Appendix 22) included a historical weather analysis, which found that CWA would remain suitable as an alternate in more than 95% of flights, even after accounting for meteorological constraints, further concluding that this is “remarkably high” compared to global standards.
		81. Examination of the list of aircraft in the Noise Impact Assessment shows that none require a 3.5 km runway. Based on freely available technical information⁴² it can readily be established that a 3.5 km runway is not needed for the Airbus A330 or for any of the listed models of Boeing aircraft in the Noise Impact Assessment.	CWA Response: The assertion that “none of the aircraft in the Noise Impact Assessment require a 3.5 km runway” is both factually incorrect and technically unsound. Firstly, the Boeing 777-200ER is explicitly listed in the Noise Impact Assessment (Table 4-8, Scenario 3) as one of the aircraft expected to operate at CWA. This is a wide-body, long-haul aircraft that has demanding runway length requirements, especially under diversion or maximum take-off weight conditions. Secondly, CWA has consulted directly with Boeing, who confirmed that in order to “maximise the benefit of the entire 777 family out of the new international airport, rain or shine,” a Takeoff Run Available (TORA) of 3,500 meters is recommended. Boeing specifically stated that this length supports safe and efficient operations of the 777-300ER, 777-9, and 777-8 at their maximum take-off weights under real-world conditions—25°C, no wind, wet or dry surface and flat gradient. Boeing concluded:

			"This will also put Cape Winelands Airport in a better light relative to the length- and obstacle-constrained Runway 01/19 at Cape Town International." This insight is critical. It confirms that a 3,500 m runway is not only justified but strategically advantageous, enhancing CWA's operational flexibility and attractiveness to international carriers operating long-haul aircraft that are already constrained at CTIA.
		a) The Airbus A380, which does require a 3.5 km runway, will fly into CTIA once the new re-aligned runway has been constructed. The obvious question that arises from the foregoing information is this: "What is the likelihood that CWA is installing a 3.5 km runway for the sole purpose of serving as an alternate destination for every aircraft where CTIA is the original intended destination, including large aircraft such as the Airbus A380?"	CWA Response: The suggestion that the 3.5 km runway at CWA is being built solely to accommodate the Airbus A380 as a CTIA alternate is not only a mischaracterisation of CWA's strategic intent, but also technically incorrect. In fact, the Airbus A380 has better runway performance than the Boeing 777-300ER and 777-9. Despite its size, the A380's four-engine design and wing loading characteristics allow it to take off and land within shorter distances than a fully loaded 777 in many operational conditions. As confirmed by Airbus and independent performance data, the A380's typical takeoff field length is around 3,000 meters, while the 777-300ER often requires around 3,500 meters under hot-and-high or max-weight scenarios. CWA's decision to implement a 3,500 m runway is not about designing for the A380, exclusively. It's about ensuring safe, flexible, long-term capability to support a wide range of aircraft—including Code E and Code F types—under real-world operational constraints: degraded weather, wet runways, high payloads and diversion scenarios. It is a decision grounded in technical modelling, long-term demand forecasting and direct consultation with Boeing, who specifically recommended 3,500 meters to maximise 777-family performance and position CWA favourably compared to CTIA's constrained Runway 01/19. This is about future-proofing an international airport to meet regulatory standards and operational demand.
		b) Related to the above is this question: Does installing a 3.5 km runway for the sole purpose of fulfilling the need for a destination alternate for CTIA for all aircraft make sense from an investment and business case perspective - given that actual use of the	CWA Response:

		airport as a destination alternate does not, on the face of it appear to be a major income generator?	The assumption that CWA's 3.5 km runway is being installed solely to serve as a diversion airport for CTIA, and that this function alone must justify the investment, reflects a narrow and flawed view of the airport's business case. CWA is not only being developed as a standby or alternate destination airport. It is a long-term aviation asset designed to serve scheduled domestic and international flights, air cargo, MRO and aerospace industry functions, with the diversion capability forming only one of several strategically important roles. The runway length supports this broader commercial and operational vision, all of which informs the airport's business plan. CWA's runway is being designed for multi-role utilisation, including freight uplift, long-haul passenger service and future aircraft types. It is worth noting that runway length is a one-time decision with 50+ year implications. It is not something that can be easily or economically changed later. Investing in the right infrastructure upfront ensures CWA is fit for purpose and competitive well into the future. In short, the 3.5 km runway is not justified by alternate use alone, but alternate use is one of many high-value roles it enables. The investment is about capacity, flexibility, safety and long-term strategic positioning.
		c) Added to the foregoing ((a) and (b) above): Firstly, actually having to divert to the destination alternate airport identified in a flight plan does not commonly or routinely occur – this is an exceptional event. This would seem to translate into limited landing fees and fuel sale opportunities (for example). Secondly, the fuel savings associated with having a destination alternate that is in close proximity to the actual intended destination airport accrues to the airline companies and not the destination alternate airport.	CWA Response: This has been addressed in 81 (b).
		82. It needs to be said that 'destination alternate' insofar as the aviation industry is concerned has a particular meaning: "Destination alternate: An alternate aerodrome to which an aircraft may proceed should it become either impossible or inadvisable to land at the aerodrome of intended landing." This term is applied interchangeably with "alternate destination." The reason why this point is being made is that the Draft EIAR uses the term "destination alternate" consistently when discussing the	CWA Response: This typo is noted and shall be corrected in the final EIAR to "<i>destination alternate</i>" from "<i>alternate destination</i>". EAP Response:

		issue of diversion (i.e. the need for aircraft to specify the airport where it would land in the event that landing at the intended destination airport is not possible). There is one exception, where the term “alternate destination” is used and which is not in the context of diversion or needing a substitute airport if landing at the intended destination airport is not possible.	This correction has been made on page 390 of the EIAR. This is the only place where “<i>alternate destination</i>” was used. The rest of the document refers to “<i>destination alternate</i>”.
		a) “Industry estimates indicate that CWA’s proximity as a diversion alternative could save airlines approximately R1.2 billion per year in fuel, operational, and scheduling costs. CWA has the opportunity to monetize a portion of these savings through strategic agreements with airlines, positioning itself as a preferred alternate destination and securing long-term commercial commitments from international carriers. This revenue stream enhances the airport’s overall financial sustainability.....” (emphasis added).	CWA Response: This typo is noted and shall be corrected in the final EIAR to “<i>destination alternate</i>” from “<i>alternate destination</i>”. EAP response: The typo has been corrected in the final EIAR.
		b) From careful examination of the wording in this statement it can be seen that it shows that as well as being a destination alternate (to address the potential need for diversion), CWA also plans to serve as an alternative intended destination airport. Furthermore, the statement suggests an intention is that CWA position itself as the preferred intended destination airport and this will be achieved through formal commercial commitments with airlines.	CWA Response: The mention of “alternate destination” is a typo, as already identified above and should read “destination alternate” in the context of facilitating diversions and enabling the savings for the airlines, as is mentioned in the paragraph referenced. However, CWA will also be a preferred destination for direct air services which has been included in CWA’s growth forecasts.
		c) According to a news article, Mr Nick Ferguson announced that “....the private airport group had signed a 15-year agreement with German airline Lufthansa Group. Ferguson said the airport is set to become a “destination alternate” airport for travellers into Cape Town, rivalling Cape Town International in capacity and accommodating more air traffic.” (emphasis added).	CWA Response: The quote cited in the comment originates from an unreferenced media article. As a designation alternate, CWA will serve a complementary function, enhancing CTIA’s role, while delivering financial, operational and environmental benefits with each flight.
		83. The notion that CWA must have a runway that is the equivalent of that at CTIA so that it can serve as a destination alternate cannot be non-negotiable. By this is meant that it cannot logically be claimed that if CWA	CWA Response: The motivation for the 3,5km runway has been addressed.

		does not have a 3.5 km runway, airlines would not use it as a destination alternate. The airport could still serve this purpose, but for fewer aircraft types. It does not absolutely have to cater for every type of aircraft that uses CTIA. Lanseria, which serves as a destination alternate to ORTIA is not able to take every aircraft type that uses ORTIA, which simply means that another airport would be selected as the destination alternate. For the larger aircraft, such as the Airbus A380, this would be King Shaka Airport in Durban.	The idea that “airlines will just use King Shaka instead” underscores why CWA must have a 3.5 km runway. If King Shaka—600 km away—is routinely selected as the alternate for larger aircraft due to the limitations of local infrastructure, that represents a clear gap in the Cape Town aviation system. CWA is designed to close that gap, not replicate Lanseria’s limitations. Furthermore, Lanseria is not a relevant precedent. It is not a coastal airport, it is hemmed in by terrain and it has a shorter, elevation-constrained runway that limits its utility to narrow-body and regional jets. CWA, by contrast, is being purpose-built with no obstacle constraints and lower elevation, allowing it to be developed to its full potential as a strategic asset. This is not about “matching CTIA for the sake of it.” It is about meeting ICAO alternate planning requirements under worst-case scenarios—including hot-and-high, wet runway, and overweight landing conditions—for the broadest possible fleet mix. Without this, CWA will always be a second-tier facility, unable to fulfill one of its most important functions.
		83.1. Key points – in summary	-
		84. The consideration of alternatives is wholly inadequate. It is unreasonable to have neglected to develop and alternative that is more responsive to the concerns of residents and to the fact that residential settlements are growing and will continue to do so into the future. Alternative layouts and development footprints within the site, that may be more responsive to land use compatibility issues have also not been identified and assessed. This includes a scaled down version of the proposed expansion has not been considered. and that takes account of future planned residential areas.	EAP response: this comment is a duplication and has been addressed.
		85. There is a mismatch in the way the ‘no go’ alternative or base case has been applied. The Noise Impact Assessment uses a different base case to all other components of the EIA process. This is wholly unacceptable. The scenario used as the base case for the Noise Impact Assessment must be applied across all environmental issues / specialist studies or the Noise Impact Assessment base case must be changed to that which is common to the rest of the EIA. The reasoning provided for using a different base	EAP response: This comment is a duplication and has been addressed above.

		case for the Noise Impact Assessment is not acceptable and is rejected with the disdain it deserves.	
		86. The justification for considering only a full-scale expansion option, including the maximum length runway is regarded as being flawed. There are examples of smaller airports serving as effective destination alternatives even where they do not cater for all possible aircraft that land at the intended destination airport. Alternatives along these lines have not been considered.	EAP response: This comment is a duplication and has been addressed.
		87. The key objective for considering alternatives has not been met, namely that of avoiding adverse impacts. This is one of the most effective ways of giving effect to the mitigation hierarchy, which is, in the first instance, to avoid negative impacts. Minimisation of negative impacts only comes into play where impacts cannot be avoided. Clearly, alternatives are also to consider enhancement of positive impacts.	EAP response: this comment has been addressed.
		88. The various flaws and shortcomings as regards the consideration of alternatives described in this section mean that insufficient information is available to the decision-maker in relation to alternatives.	EAP response: this comment has been addressed.
		4. About assessing environmental impacts The impact assessment component of the EIA process can be seen as being at the heart of the exercise. In the first instance it involves identification of impacts followed by assessment of those impacts in terms of significance. The selection of criteria used to assess significance is critical. Among others consideration needs to be given to the sensitivity of environmental attributes; relevant policies, plans and strategies; key concerns and inputs from I&APs; any applicable thresholds, limits of acceptable change and environmental related standards; mitigation measures and the likely effectiveness thereof, as well as any gaps and limitations in information and knowledge. Two key principles that need to be borne in mind are the precautionary principle and the mitigation hierarchy. In this section, the impact assessment component of the proposed CWA expansion project has been examined in some detail through the lens of noise, as this is understood to be the impact of most concern to many I&APs in general and to local	EAP response: this comment has been addressed.

		communities in particular. The manner in which noise has been addressed is, therefore, tracked from (i) impact identification; (ii) investigation of the baseline environmental conditions; (iii) prediction of impacts; (iv) applicable standards / thresholds; (v) significance rating and assessment of identified impacts; (vi) proposed mitigation measures; and (vi) monitoring and management requirements documented in the EMPr.	
	4.1 About Noise Impact and Aviation Noise is well-documented as a major concern of communities in relation to airports. According to the International Civil Aviation Organisation “Aircraft noise is the most significant cause of adverse community reaction related to the operation and expansion of airports.” I&APs have raised noise as a key issue in relation to the proposed CWA expansion project, not only from a disturbance, intrusiveness and nuisance perspective, but also in relation to sense of place and health concerns. It is for this reason that extensive attention has been paid to the question of noise and how this has been addressed in the EIA process. Focus and emphasis has been placed on issues that are pertinent to an EIA process such as whether (i) adequate comprehensive information has been provided in a clear and easy-to-follow manner; (ii) the level of concern from I&APs and questions raised by I&APs have been adequately addressed; (iii) whether the process for determining significance is logical and rigorous; and (iv) whether the mitigation hierarchy has been applied.	Specialist response: The comment is noted. EAP response: The comment is a duplication and has been addressed above.	
	4.2 How the question of noise impacts has been addressed in the Draft EIAR	-	
	89. As has already been noted, it is a well-established fact in international literature that aircraft noise is the most significant impact on communities that live close to airports. Despite this fact, the Socio-Economic Impact Assessment does not mention noise as a stand-alone impact, except in the construction phase. This is unacceptable, since the main concern around noise is in relation to airport operations. Instead, noise has been grouped with a range of other issues under ‘sense of place’. Consequently, the impact on noise on sense of place, becomes obscured because it is not considered in and of itself or as a stand alone ‘sense of place’ issue. This is not addressed in the Noise Impact Assessment either, since this specialist	EAP response: this comment is a duplication and has been addressed above.	

		study considers the impact from a mainly technical perspective. The Heritage Impact Assessment also does not deal with noise in the context of a 'sense of place' impact.	
		90. The first difficulty with the Noise Impact Assessment is that it was limited to a particular methodology in the Terms of Reference: "Use the Integrated Noise Model or its successor, which was developed by the Federal Aviation Administration as defined in SANS 10117, to determine and map the future noise contours (representing the average and maximum noise levels) associated with the proposed project."	Specialist response: The NIA was conducted using the Aviation Environmental Design Tool (AEDT), which is the official successor to the INM, developed and maintained by the U.S. Federal Aviation Administration (FAA). AEDT is: • Globally recognised and widely used for airport noise modelling. • Compliant with the methodology prescribed in SANS 10117:2009 – Calculation of Aircraft Noise Contours around Airports for Land Use Zoning. • Accepted by aviation regulators and environmental authorities in South Africa and internationally.
		91. Accordingly, the specialist applied the requirements of SANS 10117, which effectively amounts to complying with the minimum required. The modelling tool that was used by the noise specialist is the Aviation Environmental Design Tool (AEDT) from the US Federal Aviation Administration (FAA), which is the successor to the INM model mentioned in SANS 10117. It is a requirement of the SANS code to apply to most recent version / replacement of the INM as issued by the FAA.	Specialist response: See response above.
		92. It should be noted that SANS 10117 "Calculation and prediction of aircraft noise around airports for land use purposes" has the following comment: "NOTE The predicted noise levels determined in accordance with this standard may differ significantly from actual noise measurements conducted during normal operations at the airport."	Specialist response: The proposed monitoring framework ensures that any divergence between predicted and actual noise levels will be tracked, reported, and managed, thereby addressing the cautionary note in SANS 10117. The Noise Impact Assessment (NIA) explicitly recommends: • Installation of permanent noise monitoring stations, including near sensitive areas like Bella Riva, Fisantekraal, and Klipheuwel. • Post-construction verification of predicted noise levels.

			An adaptive mitigation framework, in which additional measures may be triggered if real-world data indicates higher-than-predicted impacts.
		93. The issue here is that despite the level of concern expressed by I&APs about noise and the nature of the current and future surrounding land uses (e.g. existing and proposed residential areas; rural smallholdings as well as larger farming enterprises), which are noise sensitive, no additional modelling methodologies or investigations have been applied to supplement the noise predictions resulting from the SANS 10117 approach, except for limited use of the Number of Events (N) contours.	Specialist response: As required by South African regulations, the NIA follows SANS 10117:2009, which prescribes the use of LRdn noise contours to inform land use compatibility planning. These contours remain the primary regulatory benchmark for evaluating environmental noise around airports and are used nationally to assess residential and agricultural suitability. In recognition of the specific sensitivities of the surrounding land uses, such as residential estates, smallholdings, and livestock farming enterprises, the NIA also incorporated supplementary noise metrics, beyond what is required under SANS 10117. These include: - N70 and N60 contours: These represent the number of single noise events exceeding 70 dB(A) (typically linked to annoyance) and 60 dB(A) (linked to sleep disturbance). - Time-of-day exposure assessments, particularly to quantify night-time operations, which were shown to be limited (e.g., only three aircraft movements during night-time hours). These supplementary analyses allow the assessment to consider not only average daily exposure, but also event frequency and intensity, which are important for evaluating impacts on livestock, workers, and residents. The approach taken is both methodologically sound and sufficiently comprehensive to inform decision-making and mitigation planning in a context with diverse and sensitive land uses.
		94. Thus, the modelling that has been used in the Noise Impact Assessment is considered somewhat of a 'blunt instrument'. It is not deemed to be sufficient to rely on for the purposes of understanding the noise impacts associated with the proposed CWA expansion. This comment applies	Specialist response: See response above.

		despite the inclusion of data on the Number of Events (N). This is a measure used by Australian Department of Transport and Regional Services (DOTARS).																																																
	95. Regarding the use of Number of Events (N) – also referred to as “number above”, a threshold of 70dB is used in Australia and is referred to as N70, where N70 “is the number of aircraft noise events louder than 70 dB(A). 49 70 dBA is used to categorise an event as ‘noisy’ as this is the level which can disturb conversation or other indoor activities such as watching television. It corresponds to a 60 dB(A) noise level indoors. Thus, “N70” equates to Lmax50 of 70 dBA. Insofar as the use of the “number above” data is concerned, a N70 contour shows the area (extent) and the number of times this occurs during the day. N70 events were calculated for the proposed CWA expansion. In addition, N60 events were also calculated for night-time, as this correlates to the sleep disturbance level of 50 dB(A), taking account of 10 dB noise attenuation due to the fabric of a building.	Specialist response: Noted. However, the comment is not clear. Also, the statement “Thus, ‘N70’ equates to Lmax50 of 70 dBA.” is not strictly correct as written, because N70 and Lmax50 are related but not equivalent metrics. The N70 is the number of aircraft noise events in a given period (usually per day or per night) that exceed 70 dBA (typically measured as Lmax). The Lmax50 is the 50th percentile (median) of the maximum noise levels (Lmax) from all aircraft events. This means that half of the events have Lmax above this level, and half below. The N70 = X indicates how many times noise exceeded 70 dBA. The Lmax50 = 70 dBA indicates that half of the events were louder than 70 dBA, and half were quieter.																																																
	96. This N70 metric has been applied and shows the following results for the three scenarios that were examined in the Noise Impact Assessment. <table><thead><tr><th colspan="2">SCENARIO 1 Full operation of current facility (301 ATMs)</th><th colspan="2">SCENARIO 2 Expanded CWA in Year 1 (29 ATMs)</th><th colspan="2">SCENARIO 3 Expanded CWA in full operation (208 ATMs)</th></tr><tr><th>Number of N70 Events</th><th>Affected area (km²)</th><th>Number of N70 Events</th><th>Affected area (km²)</th><th>Number of N70 Events</th><th>Affected area (km²)</th></tr></thead><tbody><tr><td>5-10</td><td>19.6</td><td>5-10</td><td>7.33</td><td>5-10</td><td>64.42</td></tr><tr><td>10-20</td><td>16.8</td><td>10-15</td><td>2.68</td><td>10-20</td><td>43.38</td></tr><tr><td></td><td></td><td>15-20</td><td>1.78</td><td></td><td></td></tr><tr><td>20-30</td><td>9.71</td><td></td><td></td><td>20-30</td><td>25.43</td></tr><tr><td>30-50</td><td>5.9</td><td>>50</td><td>0.11</td><td>30-50</td><td>16.68</td></tr><tr><td>>50</td><td>2.7</td><td></td><td></td><td>>50</td><td>6.70</td></tr></tbody></table>	SCENARIO 1 Full operation of current facility (301 ATMs)		SCENARIO 2 Expanded CWA in Year 1 (29 ATMs)		SCENARIO 3 Expanded CWA in full operation (208 ATMs)		Number of N70 Events	Affected area (km²)	Number of N70 Events	Affected area (km²)	Number of N70 Events	Affected area (km²)	5-10	19.6	5-10	7.33	5-10	64.42	10-20	16.8	10-15	2.68	10-20	43.38			15-20	1.78			20-30	9.71			20-30	25.43	30-50	5.9	>50	0.11	30-50	16.68	>50	2.7			>50	6.70	Specialist response: Noted
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	97. Further guidance is available on the use of the ‘number above’ (N) approach in Australia in the context of noise-sensitive land uses / development, which include “residential, education establishments,	Specialist response:																																																

		offices, hospitals, aged care, churches, religious activities, theatres, cinemas, recording studios, court houses, libraries and galleries.”⁵¹ Accordingly, noise-sensitive development should be avoided where ultimate capacity or long-range noise modelling for the airport indicates either: a) 20 or more daily events greater than 70 dB(A); b) 50 or more daily events of greater than 65 dB(A); or c) 100 events or more daily events of greater than 60 dB(A).	The referenced Australian guidance establishes avoidance thresholds for noise-sensitive land uses based on event counts above fixed L_{Amax} levels: • 20+ events > 70 dB(A) • 50+ events > 65 dB(A) • 100+ events > 60 dB(A) This approach is consistent with, but not contradictory to, the commonly applied day-night N70 and night N60 event exposure bands characterized by: • Day-night N70 - o ≤ 20 events/day as Low/Acceptable - o 21–50 events/day as Moderate Concern - o >50 events/day as High Concern / Significant Impact • Night N60 - o ≤ 3 events/day as Low/Acceptable - o 4-12 events/day as Moderate Concern - o >12 events/day as High Concern / Significant Impact The Australian guidance provides strict thresholds for avoidance or significant caution, which forms a baseline for planning exclusion zones. The day-night N70 and the night N60 event serve as exposure categories useful for risk gradation, communication, and progressive management. The day-night N70 metric captures overall community exposure, while the night N60 metric targets particularly sensitive nighttime periods when disturbance and sleep disruption are more critical. This dual metric approach recognizes that exposure during night hours has a disproportionate impact on wellbeing, justifying more conservative ranges for night N60.

			For Scenario 3 (New runway under full capacity) the 3 N60 contour marginally extends outside the site boundaries and there is no higher event contour as there are only 3 events in the night-time period.
		98. From the above guidance, it can be seen that the proposed expansion of the CWA shows that 20 or more exposures to 70 dB(A) occurs over an area of ~25 km² (which is an extensive distance) in Scenario 3 (full operation) with more than 50 exposures over an area of 6.7 km². What these data do not show is the actual noise level or how much above 70 dBA the noise level that will be experienced will be. There may be less detailed guidance available in South Africa, but the above results from the Noise Impact Assessment show that the development falls within the noise risk contour used in the CoCT MSDF. Effectively this means that an expanded CWA on the basis proposed does not meet accepted guidelines. As such it does not meet the limit of acceptable change or accepted thresholds applied in relation to aircraft noise impacts.	Specialist response: The assertion that the proposed expansion of Cape Winelands Airport (CWA) does not meet accepted guidelines is based on a misinterpretation of the applicable noise metrics. Specifically, the City of Cape Town's Municipal Spatial Development Framework (CoCT MSDF) uses the LRdn (long-term average day-night noise level) metric for defining noise risk contours—not the N70 or LAmx metrics referred to in the comment. While N70 (number of events exceeding 70 dB(A)) can be informative for understanding community exposure to high-level noise events, it is not the regulatory basis for spatial planning thresholds in the CoCT MSDF. The appropriate reference is the 65 dB LRdn contour, which is widely recognized in land use planning for identifying zones of potential incompatibility between airport operations and sensitive receptors. According to the Noise Impact Assessment conducted for the CWA expansion, both the 70 dB(A) and the 65 dB LRdn contours remain within the boundary of the airport site. This indicates that the proposed development does not extend noise exposure beyond the airport property and therefore complies with the spatial thresholds defined in the CoCT MSDF. Thus, the interpretation that the development falls within a noise risk contour used by the CoCT is correct, but the implication that this constitutes a violation of accepted guidelines is incorrect, because the relevant contour (65 LRdn) does not extend beyond the site boundary. As such, the proposed expansion does meet the accepted thresholds and limits of acceptable change for aircraft noise impacts within the planning framework.
		99. Communities located close to CWA are identified as shown in the table below. Distances from the CWA site as described In the Noise Impact	Specialist response:

Assessment are given. For comparison and also to provide a wider context information was obtained using Google Earth. Both residential and rural communities have been considered. The measurements taken from Google Earth are relative to the southern and northern extremes of the proposed 3.5 km runway.

Community	From Noise Impact Assessment	Measured on Google Earth
Existing Communities		
Klipheuwel / Mikipunt	~5 km to north of CWA site	~2.5 km to nearest edge of community ~3 km to midpoint of community
Fisantekraal	~3 km to south-west of site	~2.5 km to nearest edge of community ~3 km to midpoint of community
Durbanville suburb	~6 km to south-west of site	
Uitzicht		~7 km to the south west of site
Kraaifontein		~6.5 km to south west of site
East Rural		~3.5 km to south-west of site
Joostenbergvlakte		~6 km to south of site
Paarl Farms		~2.5 km to east of site
Malmesbury Farms		~ 4 km
Klapmuts		~11.5 km to south east
Future Residential Developments		
Bella Riva Lifestyle & Country Estate	Immediate neighbour to west of site	Immediate neighbour to west of site
Greenville Garden City	Immediate neighbour to south of site	Immediate neighbour to south of site

The discrepancy between distances cited in the Noise Impact Assessment and those derived from Google Earth arises from a difference in methodology and purpose.

The distances provided in the Noise Impact Assessment are based on average distances to identified noise-sensitive receptors, such as residential and rural communities, and were measured from the general boundary of the CWA site, not from the extreme ends of the proposed runway. This approach aligns with standard environmental noise assessment practice, which emphasizes representative exposure distances rather than maximum extents.

Therefore, while Google Earth measurements may be useful for general orientation, the report's approach—using averaged and spatially verified receptor distances—is more accurate and directly tied to the noise contour modeling. The communities referenced in the comment were already considered and included in the impact analysis, ensuring that the assessment reflects real-world exposure conditions rather than theoretical maximum distances.

In addition, while the table correctly notes that the Greenville Garden City development is an “immediate neighbour to the south of the site,” it is important to clarify that this refers to the entire extent of historically proposed development rights, some of which date back to 7 December 2012. Since then, a number of those rights and approvals have lapsed, particularly in areas east of the Mosselbank River, and as such, cannot be assumed to represent active or imminent residential occupation.

In terms of actual constructed homes, the nearest occupied residential area developed by Garden Cities is within the Fisantekraal community, located approximately 2.5 to 3 km south-west of the site. This distinction is critical: the Noise Impact Assessment (NIA) focuses on real, current receptors—not speculative or lapsed rights—thereby offering a more accurate and policy-compliant assessment of potential noise impacts.

Misrepresenting the entire Greenville development footprint as occupied land exaggerates the proximity of noise-sensitive receptors and does not reflect the current development reality or planning status.

		100. Besides residential communities and rural communities, there are other potentially sensitive land uses such as chicken farming. There is a County Fair chicken farm immediately adjacent to the CWA site on the west and another chicken farm some 3.5 kms to the east of the site.	Specialist response: The presence of poultry farming operations adjacent to the site has been acknowledged in the DEIR and considered in both the Noise Impact Assessment (NIA) and broader land use planning context. However, the characterisation of these as “sensitive receptors” in the same category as residential communities is overstated. Poultry farms are primarily industrial-agricultural operations, and while they may have operational sensitivities (e.g., to vibration or low-frequency noise), they are not governed by the same human health or residential amenity thresholds applied to community receptors.
		101. The reason that additional communities have been considered in the above table (relative to those mentioned in the Noise Impact Assessment) is that there is potential for a wider spread of communities to be impacted by aircraft noise from a fully operational expanded CWA than indicated in the Noise Impact Assessment. Put differently, the area of impact varies depending on what noise impact thresholds and standards are applied. This means that communities beyond the areas indicated in the Noise Impact Assessment could be impacted, if more conservative or stringent thresholds are considered than those documented in the Noise Impact Assessment.	Specialist response: The assertion that additional communities beyond those included in the Noise Impact Assessment (NIA) could be affected by aircraft noise due to the application of alternative or more conservative thresholds is noted. However, it is important to clarify that the NIA already includes all relevant communities that may reasonably experience noise exposure based on the modelled operational scenarios. The selection of receptors in the assessment was guided by both proximity to the airport and their location relative to the predicted 55, 60, and 65 dBA LRdn contours, as well as N70 and N60 exposure bands, which are widely accepted in international and national noise assessment practice. The report used robust, scenario-based modelling, including Scenario 3 (New runway under full utilisation), to ensure a comprehensive spatial and acoustic coverage. Additionally, the use of established noise thresholds—such as the 65 dB LRdn limit referenced in the CoCT Municipal Spatial Development Framework (MSDF)—ensures alignment with applicable planning and environmental standards. The suggestion that other, more conservative thresholds might yield a different outcome does not invalidate the current assessment; rather,

			it introduces a hypothetical standard that is not required by the regulatory or planning context relevant to this project.
		102. It is also questionable as to why only one set of ambient monitoring data was obtained in April 2022, despite the fact that the EIA process has been ongoing for more than 2 years thereafter. This means it would have been possible to obtain data in different seasons to obtain a fuller picture of the current situation. Nuances in baseline noise data are also not explained. For example, what levels were recorded during take-off and landing of aircraft currently operating at the site? This would have provided some real-time data of the current situation. No monitoring points are located to the east of the site, which is closest to the proposed air-side operations. Monitoring points on the western side of the site are to the south-west, so no monitoring has been to the north of the County Fair chicken farm, except at Klipheuwel. The fact is that inadequate consideration has been given to establishing a comprehensive understanding of the current situation. Instead, attention has been diverted in favour of a fictional 'no go' option, which is factually incorrect as explained elsewhere.	Specialist response: The site-specific ambient noise monitoring conducted in April 2022 was carried out in accordance with standard environmental assessment practices and provides a valid baseline reference for the Noise Impact Assessment. Baseline ambient monitoring is typically used to characterize the existing noise environment at sensitive receptor locations, and a single-season, site-specific survey is both common and acceptable in Environmental Impact Assessments (EIAs), particularly where the monitoring is representative of typical site conditions. The monitoring locations were strategically selected to represent existing residential areas, which are the primary sensitive receptors for aircraft noise. These sites were chosen to capture ambient noise levels where potential human impacts are most relevant, rather than across undeveloped or agricultural areas with limited human presence. While it is true that seasonal variation can influence ambient noise, the predictive modelling conducted in the NIA—based on worst-case operational scenarios—supplements the baseline data to assess future impacts. Furthermore, monitoring of actual noise levels during aircraft operations has been recommended in the Environmental Management Programme Report (EMPR). This includes provisions for ongoing operational monitoring, which will allow for refinement and verification of modelled predictions and adaptive management of noise impacts. The comment also suggests gaps in spatial coverage, particularly to the east of the site. However, it should be noted that Klipheuwel, located to the north-west, was included as a receptor, and the modelling covered all directions of potential exposure under each operational scenario. The absence of a physical monitoring station in one specific direction does not equate to an absence of assessment, as the noise model incorporates topography, aircraft types, runway orientation, and flight paths to determine noise contours across the entire affected area.

			In summary, the baseline noise monitoring and predictive modelling are robust, representative, and consistent with regulatory norms, and additional data collection is already planned through the EMPR to ensure continuous noise management. The use of Scenario 1 as the “No-Go Alternative” is fully compliant with EIA best practice and the 2014 EIA Regulations. This scenario does not represent current low-intensity operations at Cape Winelands Airport (CWA), but rather the maximum operational potential of the existing airfield under current lawful rights—a standard approach for defining the No-Go scenario in comparative environmental assessments. This conservative scenario is necessary to: • Benchmark impacts against the lawful baseline, not just current underutilisation; • Demonstrate whether the proposed development introduces a net increase or decrease in environmental impact relative to what could be legally exercised today; • Reflect the permitted, not merely observed, activity levels, in line with precautionary planning principles.
		103. This so-called ‘no go’ option is the fully operational CWA with current facilities. As noted elsewhere, use of all 4 runways is currently not possible due to the condition of some of them and the fact that one of these runways is occupied by a go-cart track. This means some changes / upgrades and possibly expansion will be necessary to make the current facility fully operational. Therefore, this is in fact an alternative to the proposed expansion as opposed to being the ‘no go’ or ‘do nothing’ option.	Specialist response: The claim that one runway is occupied by “a go-cart track” is incorrect. The runway in question was partially resurfaced by a film production and painted for cinematic purposes; it is not actively used for go-karting or any non-aviation function. It remains legally a runway and is available for lawful aviation use once activated with the SACAA. Scenario 1 is not a fallback plan requiring upgrades or modifications. It simply represents the existing legal rights—a pre-NEMA lawful use—which do not require environmental re-approval. This approach provides a conservative

			comparison to ensure that impacts of the proposed development are not understated.
		104.A further concern in relation to baseline noise monitoring is that none was undertaken in the rural areas to the north and south of the CWA in the vicinity of the likely flight-path. As a consequence, the focus in the Noise Impact Assessment is on the Urban Residential standard from SANS 10103 and no cognisance has been taken of the rural limit in the SANS code, despite the potential for rural areas to be adversely affected by aircraft noise.	Specialist response: The concern regarding the absence of baseline noise monitoring in rural areas to the north and south of Cape Winelands Airport (CWA) overlooks several key aspects of the Noise Impact Assessment (NIA) and the broader impact assessment process. Firstly, the NIA adheres to standard environmental assessment practice as defined in South African regulations, including SANS 10103 and SANS 10117, by focusing on human health, amenity, and land use compatibility. These are the primary objectives of a noise assessment in the EIA context. Contrary to the claim, rural areas and agricultural land were in fact considered in the NIA. This was achieved through: • Spatial noise modelling, which extends across the full flight-path area and overlays contours on both urban and rural land parcels; • Consideration of sensitive receptors such as smallholdings, rural residential dwellings, and farming operations; • Inclusion of land use zoning and receptor sensitivity in the impact interpretation. While the Urban Residential standard from SANS 10103 is referenced where applicable, the character of land use—urban, suburban, or rural—was taken into account when interpreting noise impact significance. It is important to note that 55–60 dB(A) LRdn in rural/agricultural areas is not automatically considered unacceptable, especially when those areas are situated near existing or proposed aviation infrastructure. Rather, these contours are used as planning tools, not as rigid exclusion zones.

			Further, issues related to avian biodiversity and ecological sensitivity in rural areas fall outside the NIA's scope and are addressed in the Terrestrial Biodiversity Specialist Study, which forms part of the Draft Environmental Impact Report (DEIR). That study specifically considers the sensitivity of birds and other fauna to aircraft noise in ecologically important zones. The DEIR also includes a Land Use Planning Report and a Socio-Economic Impact Assessment, both of which evaluate how aircraft noise intersects with agricultural viability, rural livelihoods, and planning compatibility. These studies, taken together, ensure that rural noise impacts are fully addressed in an integrated and multidisciplinary manner. Finally, mitigation measures such as zoning controls, land use compatibility guidance, and a future Noise Mitigation and Management Plan (NMMP) will support long-term planning responses, particularly in areas where rural land uses and aircraft operations intersect.
		105.No baseline monitoring has been undertaken at sensitive receptors listed in the Noise Impact Assessment, with a few the exceptions of the Fisantekraal school and the County Fair chicken farm. Since the use of the rural noise limit from SANS 10103 has not been applied, sensitive receptor (called discrete receptors), exceedances of this limit are not noted. For example, noise predictions show that the limit of 45 dBA specified in the SANS code will be exceeded at the Farmhouse, ~600 m east of CWA (refer to Table 4-18). Predicted noise levels at Fisantekraal school, which is also a sensitive receptor are just below this threshold and those at Klipheuwel school exceed this level.	Specialist response: The farmhouse indicated in the comment is receptor R11, which is erroneously indicated in the report as being east of the airport. Its location, as can be seen from Figure 4-6 is in fact south of the airport. This will be rectified. The NIA followed a standard, spatially representative approach to ambient noise monitoring by targeting key receptor types, including existing residential, educational, and agricultural operations, in order to characterize the broader acoustic environment. While it is not feasible to place monitoring equipment at every discrete receptor, the results from selected representative sites, such as Fisantekraal school and County Fair chicken farm, serve to establish a valid and generalizable baseline for similar receptor types within the study area. With respect to the farmhouse located approximately 600 m from the CWA, it is important to contextualize its status. While this receptor is currently in a rural setting, it falls within an area identified in regional planning instruments for future urban residential development. As such, applying the most stringent

			rural threshold of 45 dB(A) from SANS 10103 in a rigid manner does not reflect the planned trajectory of land use in the area. In line with SANS 10103, noise limits must be interpreted with due regard to the contextual land use and anticipated changes in zoning or development intensity. As the farmhouse lies within a zone earmarked for urban expansion, the applicable noise threshold is expected to shift over time, aligning with suburban or urban residential criteria rather than remaining fixed at rural levels. Furthermore, the NIA provides transparent exceedance mapping and predictions for discrete receptors, allowing for informed decision-making. Where modelled noise levels exceed indicative thresholds, these are explicitly reported and will be addressed through the proposed Noise Mitigation and Management Plan (NMMP) and land use controls. In conclusion, while the 45 dB(A) rural threshold is acknowledged in the SANS code, its application must be balanced with land use plans and development trends. The NIA does this appropriately, ensuring that both current and future receptor sensitivities are considered in the impact evaluation.
		106. The approach adopted in the Noise Impact Assessment is regarded as insufficiently nuanced and detailed to provide with clear and accurate predictions and interpretations of noise impacts, in general and in particular as regards the noisiest components of aircraft movements such as landing and take-off. For example, the A-weighted average noise level associated with a jet plane take-off is 120 dBA⁵². Clearly, there are aircraft that release less noise during take-off. Weather conditions, among others will also influence noise levels.	Specialist response: The reference to an A-weighted noise level of 120 dBA during take-off is misleading and uncontextualized. While certain military or outdated high-powered aircraft may reach such levels at source (i.e., near engine or runway), these are not the aircraft types modelled for the proposed Cape Winelands Airport (CWA) operations. The NIA is based on a fleet mix reflective of anticipated commercial and general aviation use, including modern, quieter aircraft that comply with ICAO Annex 16 noise standards. The influence of weather conditions on noise propagation is well understood and incorporated through standardized meteorological parameters in the modelling process. The use of worst-case assumptions (e.g., downwind propagation) ensures that predicted impacts err on the side of conservatism, as is required in environmental impact assessments.

			Furthermore, the model provides spatially explicit noise contours (e.g., 55, 60, and 65 dB LRdn) and event-count thresholds (e.g., N70>50), enabling nuanced interpretation of both chronic and acute noise exposure. The findings are aligned with international benchmarks, including WHO, ICAO, and South African SANS guidelines. In summary, the NIA does account for the noisiest elements of aircraft operations, uses conservative and well-established modelling parameters, and provides both quantitative and spatial detail sufficient for decision-making. Assertions that the approach is oversimplified are not substantiated by the technical methodology applied.
		107. Methods for obtaining more detailed information about noise exposure of receptors is applied in both Australia and the USA, for example. More detailed analysis methods include:	Specialist response: Noted.
		a) It is possible to show the impact of aircraft noise for individual flight movements and types of aircraft through the use of single event noise contours. This has not been done.	Specialist response: The Noise Impact Assessment (NIA) was designed to evaluate the realistic operational impacts of the proposed expansion of Cape Winelands Airport (CWA), using a combination of cumulative noise metrics (e.g., LRdn, N70, N60) that are internationally recognized for assessing long-term human health and land use compatibility. While it is technically possible to produce single event noise contours for individual aircraft types or movements (L_{Amax}), these are not typically used for environmental decision-making because they do not reflect the repeated exposure that leads to significant community annoyance or health outcomes. Instead, cumulative exposure metrics, such as those applied in the NIA, are the preferred standard globally (e.g., by ICAO, UK CAA, and SANS 10117). Moreover, the NIA does address maximum noise levels (L_{Amax}) and includes event-based thresholds like N70, which account for the frequency and level of individual high-noise events, particularly during take-off and landing phases.

			These indicators effectively capture the community experience of aircraft noise in a more meaningful way than isolated event contours. It is also worth noting that the provision of single event contours does not inherently improve the assessment unless linked to an unrealistic worst-case scenario. Instead, the NIA has focused on realistic operational data, representative aircraft types, and spatial noise contouring that reflects both current land use and future development plans. In conclusion, the decision not to generate single-event contours does not represent a methodological gap, but rather a deliberate and appropriate alignment with best-practice environmental noise assessment standards, ensuring that the results are both robust and relevant for planning and mitigation purposes.
		b) It is also possible to determine the sound level exposure which is a measure of cumulative noise exposure for a single aircraft flyover. It shows the sound level over time, thereby giving insight into the duration of exposure to different levels of noise during an aircraft flyover. This has not been done.	Specialist response: The Noise Impact Assessment (NIA) for Cape Winelands Airport (CWA) follows international best practice by focusing on cumulative noise exposure metrics that are most relevant for assessing community health, annoyance, and land use compatibility. While it is technically feasible to generate detailed sound exposure curves (e.g., Sound Exposure Level – SEL) for individual flyovers, this level of analysis is not typically required nor standard in environmental impact assessments under South African guidelines (SANS 10103, 10117) or international frameworks. The NIA's approach aligns with accepted norms by emphasizing cumulative exposure metrics that are more relevant for policy-making, health impact evaluation, and land use planning. The omission of individual time-history traces does not undermine the integrity or sufficiency of the assessment.

		108.The Noise Impact Assessment places reliance on average noise level data and whether this falls within the parameters set out in SANS 10103 is inadequate. This approach fails to address the finer detail and nuances in the noise profile of aircraft which are particularly relevant in an airport situation, namely take-off, approach, to landing. Furthermore, given CWA's stated intentions about being a 'green airport', it would be expected that the highest of standards would be applied throughout – from the planning phases through to whatever version of an upgrade / expansion is implemented. This includes seeking to meet international best practice in all facets of the project.	Specialist response: See responses above.
		109.The Day Night Average Sound Level (DNL or Ldn) noise metric is used to reflect a person's cumulative exposure to sound over a 24-hour period. The FAA defined aircraft noise exposure of DNL 65 to 75 dBA in residential areas as "significant" and DNL 75 dBA or more as "severe." Generally, the "guidelines say that DNL levels between 55 and 65 dB indicate moderate exposure and are generally considered acceptable for residential use. Internationally the 55dB level seems to be favoured, with the United States FAA adopting a 65 dB level threshold."53 According to information on the American Acoustical Society website from a paper published in 2022, the USEPA (US Environment Protection Agency), however, does not regard this threshold as adequate. The EPA has calculated that the safe noise levels for the public are DNL =<55dB to prevent outdoor activity interference and annoyance and =<45 dB to prevent indoor activity interference and annoyance.54	Specialist response: The Ldn/DNL is a cumulative noise metric that averages noise over a 24-hour period, with a 10 dB penalty applied to night-time noise (typically 10 PM to 7 AM), making it suitable for assessing general community annoyance and land use compatibility. The U.S. Federal Aviation Administration (FAA) uses 65 dB DNL as a land use compatibility threshold—not as a direct health-based limit. It marks the point at which residential areas become eligible for federal noise mitigation measures (e.g., insulation or relocation). The U.S. Environmental Protection Agency (USEPA), in contrast, published advisory recommendations in 1974 suggesting DNL limits of ≤55 dB for outdoor activity protection and ≤45 dB indoors, based on health and annoyance considerations. These are aligned with the World Health Organization (WHO) guidelines, which also favour a more conservative approach for long-term exposure. In South Africa, the NIA uses the LRdn metric, which is functionally equivalent to DNL/Ldn, incorporating a night-time penalty of 10 dB in line with SANS 10103 and SANS 10117. The thresholds applied, particularly the 55, 60, and 65 dB LRdn contours, align with international norms and allow for a nuanced assessment of both moderate and high noise exposure areas. While DNL/Ldn thresholds vary by jurisdiction and purpose (e.g., land use compatibility vs. public health), the NIA applies metrics and thresholds

			consistent with both national and international best practices, and does so in a conservative and precautionary manner.
		110. The above information begs the question: why have more conservative thresholds not been applied in the Noise Impact Study? Why is only N70 shown for day-night and not the other more conservative 'number above' scenarios such as N55 and N45. In particular, it would be expected that the threshold recommended by a credible international environmental organisation such as the US EPA would be considered. Furthermore, on what rational basis has the N65 contour not been shown since this would reflect the 65 dBA risk level from the CoCT MSDF?	Specialist response: The Noise Impact Assessment (NIA) applies industry-standard and regulator-accepted cumulative and event-based metrics that are appropriate to the South African context, while also aligned with international practice. These include: • LRdn (equivalent to Ldn or DNL) for cumulative exposure, incorporating a 10 dB night penalty; • N70 and N60 metrics for quantifying the number of events exceeding 70 dB(A) during the day-night period and 60 dB(A) during night hours, respectively The N70 metric is widely used internationally (e.g. Australia, UK) as a threshold of moderate to high concern for disturbance and community annoyance. The N60 metric already provides a more conservative view for night-time operations, when sensitivity is higher. While N55 or N45 could theoretically be calculated, these thresholds are not in routine use in regulatory practice because lower thresholds tend to overstate concern in areas where ambient background levels (especially in urban fringe or mixed-use areas) already exceed 50–55 dB(A). Regarding the City of Cape Town's MSDF risk contour, the CoCT uses a 65 dB(A) LRdn cumulative threshold to demarcate a noise-sensitive risk zone. The NIA does incorporate and present the 65 dB(A) LRdn contour, clearly showing that it remains within the CWA property boundary, even under full operational scenarios. Therefore, the reference to N65 in this context is a misunderstanding as the MSDF guidance is based on LRdn, not N65 (i.e., the number of events above 65 dBA), and the NIA correctly applies the appropriate metric.

			Finally, while international bodies like the US EPA and WHO provide valuable health-based guidance (e.g. DNL ≤ 55 dB), those are not regulatory thresholds. In South Africa, the SANS 10103 standard governs environmental noise assessments and sets locally appropriate limits based on land use, background conditions, and acceptability criteria. In conclusion, the NIA's approach is both methodologically sound and policy-compliant, using conservative and internationally accepted metrics. It balances community protection, regulatory alignment, and data interpretability without overstating impacts through the use of marginal or unsupported thresholds.
		111. The health effects of aircraft noise are briefly discussed in Section 2.3 of the Noise Impact Assessment. This is a generic discussion and is unsupported by any desk-top research or consultation of any experts in this field. Phrases such as "Research into the effects of noise...." and "Researchers have also identified...." appear in Section 2.3 of the Noise Impact Assessment but not one single piece of research is referenced. The treatment of this issue is regarded as a cursory acknowledgement that aircraft noise impacts on communities. It is not, by any reasonable standard, an acceptable level of assessment of this impact. In any event the noise specialist is not qualified to comment on or assess the health impact associated with aircraft noise on surrounding land uses and local communities (current and future) has not been adequately addressed.	Specialist response: The primary purpose of the Noise Impact Assessment (NIA) is to quantify and predict aircraft noise exposure in accordance with South African regulatory standards (SANS 10103 and SANS 10117), and to assess the potential impact on human amenity and land use compatibility. While the NIA is not a formal health risk assessment, it does incorporate and summarize the internationally acknowledged health effects associated with long-term noise exposure, such as sleep disturbance, annoyance, and cardiovascular risks, which are widely documented in literature from the World Health Organization (WHO), European Environment Agency, and the US Environmental Protection Agency (EPA). Section 2.3 of the NIA offers an introductory overview of these effects to provide context for why noise thresholds such as N70, N60, and LRdn are used, and why night-time noise is penalized. The section is not intended to serve as an exhaustive literature review but rather to support the rationale for the application of internationally aligned noise indicators and thresholds. In line with best practice, the quantitative assessment of exposure is the domain of the noise specialist. Where site-specific health studies are required, these are typically undertaken under a separate Health Impact Assessment (HIA). It is important to note that such an HIA has not been scoped as a requirement in this Environmental Impact Assessment process, nor is it

			typically required unless triggered by specific thresholds or public health concerns raised by competent authorities. That said, the exposure-response relationships used in the NIA (e.g., expected effects at N70 or 65 dB LRdn) are based on robust international epidemiological research, even if those references are not individually cited in the summary discussion. The mitigation hierarchy proposed in the NIA—combined with monitoring, land use compatibility planning, and the development of a Noise Management Plan—are designed to manage and reduce exposure, which is the key preventative strategy against health risks related to noise. In conclusion, the NIA appropriately addresses the noise-health linkage within its scope, and does so using recognised metrics and exposure-response relationships. The EIA as a whole includes mechanisms to ensure that health and amenity are adequately protected through cumulative and cross-disciplinary inputs, including social, planning, and biodiversity assessments.
		112. Research has consistently shown that aircraft noise will damage people's hearing, increase their level of anxiety and interfere with sleep and may affect mental health. It has even been and even increase the risk of cardiovascular diseases such as hypertension and coronary heart disease. In addition, aircraft noise has been found to increase the probability of attention deficit hyperactivity disorder among children.^{55,56} This latter point is particularly important, since families with young children are likely to form a significant proportion of the Greenville Garden City community.	Specialist response: See responses above.
		113. The adverse effects of noise are acknowledged in the new definition of noise adopted by the American Public Health Association in its 2021 Policy Statement on "Noise as a Public Health Hazard", which is: "noise is unwanted and/or harmful sound."¹⁴ A new definition has been. Environmental noise is "unwanted and/or harmful outdoor sound created by human activities, including noise from road traffic, railway traffic, airports and industrial sites, to which the public is exposed involuntarily."⁵⁷ and was adopted for use and added to its Constitution by the International Commission on Biological Effects of Noise in 2023. The	Specialist response: Refer to responses above. In addition, the WHO itself emphasizes that these thresholds are not regulatory limits, but health-based recommendations to guide national standard-setting, which must balance local socio-economic conditions, land use realities, and infrastructure constraints. South Africa applies the SANS 10103 standard and SANS 10117 for aircraft noise, which incorporate

		World Health Organization (WHO) environmental noise guidelines (as updated in 2024) to prevent adverse health effects are: (i) for road traffic are no more than 53 dB average levels; (ii) 45 dB from aircraft over the course of a day; and (iii) average nighttime levels are even lower.⁵⁸	contextual land use compatibility, noise zones, and acceptable levels for various environments, including urban, rural, and industrial settings. While the NIA recognizes the public health rationale behind stricter global recommendations, its approach is based on locally applicable, policy-aligned, and internationally benchmarked standards, and effectively quantifies and manages aircraft noise exposure in a manner that is both realistic and enforceable in the South African context.
	114.	The socio-economic impact does not address noise as a separate impact but combines it with dust under ‘nuisance factors’ and only for the construction phase. This means that noise impacts have been assessed solely on a technical basis in the form of the Noise Impact Assessment specialist study, the focus being on noise levels. The associated impacts on health, wellbeing and sense of place have not been addressed.	Response from socio-economic specialist: Full impact assessments for Noise, Visual, Heritage and Air Quality were done by experts in the respective fields and should not be re-assessed in the Socio-Economic Impact Assessment. These impacts are thus consolidated and briefly discussed under Sense of Place, which relates to people’s perspective of their living environment.
	115.	As has been noted in Section 2 of this report, Scenario 1 that has been applied in the Noise Impact Assessment does not represent the current situation at CWA. This scenario is based on all four runways being in operation, which is not the case. Thus, the figure of 301 aircraft movements is a wholly inaccurate representation of the baseline / base case / ‘no go’ development conditions.	EAP response: this comment is a duplication and has been addressed.
	116.	Furthermore, it appears that at least some of the 4 runways will require upgrading / refurbishment in order to be put back in use. The Aviation specialist study: states “The concrete surface of these runways visually appears to be in reasonable condition, although it is cracked heavily and quite uneven in places. Parts of the runways are no longer in use; some areas were overgrown, and localised subsidence has been reported.”	EAP response: this comment is a duplication and has been addressed.
	117.	The full operation of the existing CWA (i.e. all four runways) is an alternative that is different to the current situation. It seems likely that upgrading and even possible expansion of facilities may be required, given that it caters for around 300 ATMs per day and the current level is 100	EAP response: this comment is a duplication and has been addressed.

		ATMs. Hence more aircraft will surely be present, which may well require additional hangar and related facilities.	
		118. Figure 4-1 in the Noise Impact Assessment is titled “Current Runway System Paths”. This title is inaccurate and misleading since this figure does not represent the current situation. The figure does, however, have the effect of creating a visual picture of many flight paths spread in all directions. This is a false picture and amounts to misinformation. If it is a possibility that CWA would operate the CWA in the manner shown in Figure 4-1 and Table 4-5, then this must be identified as an alternative and assessed accordingly as has already been noted in Section 2 of this report.	Specialist response: The concern raised regarding Figure 4-1 (“Current Runway System Paths”) appears to stem from a misinterpretation of the purpose and content of the figure. The flight paths shown in Figure 4-1 are not speculative or hypothetical; they reflect the actual directional alignments of the existing runways at Cape Winelands Airport (CWA) and are intended to illustrate the technical potential for aircraft arrivals and departures associated with those runways. These paths are not meant to imply that all directions are equally used, nor that a random dispersion of flight activity occurs. Instead, they are aeronautical trajectories aligned with runway headings, and their use is condition-dependent, primarily influenced by prevailing wind directions and weather patterns, which determine runway selection under standard aviation operations. The assertion that this constitutes “misinformation” is therefore not substantiated. On the contrary, presenting all technically valid runway paths is a standard method in noise modelling to ensure that worst-case directional impacts are captured, especially where take-off and landing directions can shift based on variable wind conditions. This ensures a more precautionary and inclusive assessment of possible noise exposure to surrounding receptors. EAP response: this comment is a duplication and has been addressed.
		119. The Noise Impact Assessment notes: “As can be seen from Table 4-5, the resulting total number of operations during a typical busy day for the current runway layout is 301 per day. The aircrafts which are predominantly utilised are the Cessna 172 and the Piper PA-28, accounting for more than 85% of the total daily movements.” Table 4-5 does not make sense. It comprises two separate tables, the first of which covers three runways (0-19; 32-14; 05-23) and the second one runway (3-21) both of	Specialist response: The total number of aircraft movements across all runways, including Runway 3-21 and Runways 0-19, 32-14, and 05-23, is confirmed to be a maximum of 301 operations on a typical busy day (worst-case scenario). In Table 4-5, Runway 3-21 is presented separately, as it is also used by aircraft such as the DASH 6/PT6A-27 RAISBECK QUIET PROP MOD, which is relevant for distinguishing aircraft types in the noise modelling context.

		which show the same aircraft and the total movements as 301 in both tables.	Final runway utilisation is influenced by operational factors such as weather conditions (particularly wind direction) and the type or performance characteristics of the aircraft. In the AEDT noise modelling, runway allocation was based on the prevailing average wind directions in the area, which is standard practice in aviation noise assessments. 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 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.
		a) This is unclear, because it seems to indicate that there is a combined total of 301 movements for runways 0-19; 32-14; 05-23 as well as a total of 301 movements for runway 3-21.	Specialist response: See response above. A typographical error was identified in the first two rows of the total operations per aircraft type for Runways 0-19, 32-14, and 05-23 in Table 4-5. These figures have been corrected and are now indicated as 100 and 0, respectively. The overall total of 301 operations for the “busy day” scenario remains accurate and unchanged.
		b) In addition, the situation with the Piper Warrior is unclear. In both tables it is shown as having 101 circuits, but no figures appear for take-off or landing of this aircraft. What does this mean?	Specialist response: The Piper Warrior is listed as performing 101 circuit operations, which by definition include both a take-off and a landing as part of each circuit. In circuit training, aircraft remain in the airport traffic pattern and do not conduct separate full-stop departures or arrivals. As a result, the Piper Warrior does not appear in the separate take-off or landing columns, since its operations

			are entirely captured under “circuits.” This is standard practice in airfield activity reporting and noise modelling.
		c) Also, how many of each aircraft type and model is catered for in this Scenario 1? How many will be in the air at the same time?	Specialist response: Scenario 1 represents a “busy day” operational scenario based on the total number of daily aircraft movements by type, not the number of individual aircraft or simultaneous operations. The figures reflect cumulative daily activity rather than fleet size. The number of aircraft in the air at any one time depends on air traffic scheduling, circuit patterns, and operational spacing, which can vary throughout the day. Noise modelling does not assume all aircraft are airborne simultaneously; rather, it distributes operations across the day in line with typical patterns to represent realistic noise exposure. The number of aircraft in the air at any given moment is not directly relevant to noise contour modelling, which focuses on cumulative sound exposure at ground level. The model distributes aircraft movements across a representative busy day to assess potential noise impacts. This approach aligns with standard practice and provides a conservative, policy-compliant basis for evaluating long-term exposure, without requiring real-time simulation of air traffic volumes. Real-time noise levels, however, will be monitored through a continuous monitoring system that will be installed to track both noise levels and aircraft movements, ensuring ongoing oversight and compliance with noise management objectives.

		120. It is also unclear as to exactly what is included in Scenarios 2 and 3, relative to the figures in the Airspace-CONOPS Report (Appendix 18):	Specialist response: Scenarios 2 and 3 in the Noise Impact Assessment (NIA) are clearly defined and internally consistent, and their inputs are aligned with the figures and assumptions provided in the Airspace-CONOPS Report (Appendix 18). Scenario 2 reflects the initial operational year of the new 3.5 km runway, with 29 aircraft movements per day, while Scenario 3 reflects full operational capacity with 208 aircraft movements per day, including general aviation, commercial, and limited night operations. Any perceived discrepancies likely stem from differing purposes between the two reports: the Airspace-CONOPS focuses on airspace structure, flight paths, and operational flow, while the NIA focuses on noise exposure and ground-level impact. While the documents may present information in different formats or levels of detail, the core figures are compatible and have been deliberately cross-referenced to ensure alignment of assumptions. The NIA transparently states its modelling inputs, flight mixes, and operational assumptions for each scenario, ensuring that stakeholders and decision-makers can engage meaningfully with the data. There is no material inconsistency, only a difference in focus and technical perspective between the two specialist studies.
		a) In the Noise Impact Assessment Scenario 2 is based on a total of 29 air traffic movements (ATMs), of which 2 are ascribed to jet airliners (Boeing 737-800) or scheduled aircraft movements. It is unclear as to exactly when Scenario 3 (full operation), with 208 ATMs will come into effect.	Specialist response: Scenario 3 in the Noise Impact Assessment (NIA) represents the ultimate full-capacity operational state of Cape Winelands Airport and is not intended to reflect an immediate or short-term condition. It corresponds with the long-term development horizon of the project, projected to be reached around 2050, as noted in the supporting project documentation and phasing assumptions aligned with the PAL (Planning Activity Level) framework. The progression from Scenario 2 (initial operations at 29 ATMs, including limited scheduled services) to Scenario 3 (208 ATMs with a broader aircraft

			mix) will occur incrementally, subject to actual demand, infrastructure expansion, and regulatory oversight. The inclusion of Scenario 3 is essential for understanding the full future noise envelope and informing proactive planning and mitigation strategies. Rather than being unclear, this approach reflects standard EIA best practice, where future build-out scenarios are modelled to assess long-term impacts—even if they are decades away. This ensures that land use, infrastructure planning, and environmental management measures can be structured with foresight and adaptability.
		b) The correlation between the scenarios that have been considered in the Noise Impact Assessment and the figures provided in the Airspace-CONOPS report (Appendix 18) is wholly unclear. This raises questions about exactly what data has been used to model noise impacts and whether an accurate picture of noise impacts is reflected. There appear to be disparities between the figures used in the Noise Impact Assessment and those given in the Airspace-CONOPS report, as explained in the following points.	Specialist response: The scenarios used in the Noise Impact Assessment (NIA) are based on the same underlying operational data as the Airspace Concept of Operations (Airspace-CONOPS) report, but they serve distinct purposes and are structured accordingly. While the Airspace-CONOPS focuses on flight procedures, airspace design, and traffic flows, the NIA applies these inputs to model ground-level noise exposure using standard aviation acoustics methodology (AEDT). Apparent differences between the two documents may arise from differences in formatting, emphasis, or aggregation of data. For example, the CONOPS may list theoretical maximums or route-specific breakdowns, while the NIA consolidates total daily movements into representative scenarios for noise modelling. Importantly, all aircraft types, runway configurations, and movement volumes used in the NIA are transparently documented and traceable to the broader operational assumptions in the CONOPS. The modelling reflects a conservative “busy day” scenario to ensure potential noise impacts are not underestimated.

			Therefore, there is no inconsistency in the underlying data — only a difference in how the information is applied to meet the respective objectives of each report.																																																																																																								
	c) According to the Airspace-CONOPS report, there will be 1,192 ATMs in year 1 (given as 2026) for scheduled flights (international, domestic and regional-international). Thereafter, ATMs ramp up substantially. From the second year of operation, flights in all 3 of these categories occur, making a total of 3,159 ATMs, more than double that of year 1. The situation continues in this fashion, with ATMs increasing year-on-year as shown in the diagram overleaf.⁶¹ Annual ATMs (Arrivals & Departures) <table><thead><tr><th></th><th>2026</th><th>2027</th><th>2028</th><th>2029</th><th>2030</th><th>2031</th><th>2032</th><th>2033</th><th>2034</th><th>2035</th><th>2036</th><th>2037</th><th>2038</th><th>2039</th><th>2040</th><th>2041</th><th>2042</th><th>2043</th><th>2044</th><th>2045</th></tr></thead><tbody><tr><td>Domestic</td><td>1,192</td><td>2,443</td><td>3,690</td><td>4,936</td><td>6,182</td><td>7,428</td><td>8,674</td><td>9,920</td><td>11,166</td><td>12,412</td><td>13,658</td><td>14,904</td><td>16,150</td><td>17,396</td><td>18,642</td><td>19,888</td><td>21,134</td><td>22,380</td><td>23,626</td><td>24,872</td></tr><tr><td>International</td><td>433</td><td>1,893</td><td>3,203</td><td>4,513</td><td>5,823</td><td>7,133</td><td>8,443</td><td>9,753</td><td>11,063</td><td>12,373</td><td>13,683</td><td>14,993</td><td>16,303</td><td>17,613</td><td>18,923</td><td>20,233</td><td>21,543</td><td>22,853</td><td>24,163</td><td>25,473</td></tr><tr><td>Regional International</td><td>265</td><td>468</td><td>769</td><td>1,070</td><td>1,371</td><td>1,672</td><td>1,973</td><td>2,274</td><td>2,575</td><td>2,876</td><td>3,177</td><td>3,478</td><td>3,779</td><td>4,080</td><td>4,381</td><td>4,682</td><td>4,983</td><td>5,284</td><td>5,585</td><td>5,886</td></tr><tr><td>Total</td><td>1,192</td><td>3,219</td><td>6,053</td><td>8,948</td><td>11,541</td><td>13,303</td><td>14,985</td><td>16,700</td><td>18,415</td><td>20,099</td><td>21,900</td><td>23,745</td><td>25,590</td><td>27,435</td><td>29,280</td><td>31,125</td><td>32,970</td><td>34,815</td><td>36,660</td><td>38,505</td></tr></tbody></table> Forecast scheduled annual air traffic movements, from file: 2022-08-19 Traffic Forecast (Consultants)		2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	Domestic	1,192	2,443	3,690	4,936	6,182	7,428	8,674	9,920	11,166	12,412	13,658	14,904	16,150	17,396	18,642	19,888	21,134	22,380	23,626	24,872	International	433	1,893	3,203	4,513	5,823	7,133	8,443	9,753	11,063	12,373	13,683	14,993	16,303	17,613	18,923	20,233	21,543	22,853	24,163	25,473	Regional International	265	468	769	1,070	1,371	1,672	1,973	2,274	2,575	2,876	3,177	3,478	3,779	4,080	4,381	4,682	4,983	5,284	5,585	5,886	Total	1,192	3,219	6,053	8,948	11,541	13,303	14,985	16,700	18,415	20,099	21,900	23,745	25,590	27,435	29,280	31,125	32,970	34,815	36,660	38,505	Specialist response: The data cited from the Airspace-CONOPS Report reflects forecasted annual air traffic movements (ATMs) for scheduled commercial operations only, and does not include general aviation (GA), training flights, or unscheduled charter traffic, which form a substantial portion of movements in the earlier phases of Cape Winelands Airport’s (CWA) development, particularly in Scenario 2 of the Noise Impact Assessment (NIA). The NIA’s Scenario 2, which models 29 ATMs per day, equates to approximately 10,500 annual movements and includes a broader mix of aircraft types and operations, including flight training and general aviation, which are not shown in the scheduled-only figures in the Airspace-CONOPS graph. Scenario 3 models 208 daily ATMs, which aligns with the full operational capacity projected around the 2045–2050 mark, matching the growth curve seen in the traffic forecast. There is no inconsistency or contradiction. The NIA and the Airspace-CONOPS report are using different scopes of traffic for their respective modelling purposes. The NIA considers total operational activity for environmental impact purposes, while the Airspace-CONOPS focuses on scheduled airspace planning. The upward trajectory of movements is fully aligned across both documents when the full range of aviation activity is taken into account.
	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045																																																																																							
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	d) It therefore appears that Scenario 2, which represents the first year of operation according to the Noise Impact Assessment, with 4 ATMs associated with scheduled flights (Boeing 737-800) may relate to the 1,192 ATMs (as shown in the above diagram for year 1 (2026)) as this translates to an average of 3.3 ATMs per day.	Specialist response: The correlation made between Scenario 2 in the Noise Impact Assessment (NIA) and the 1,192 scheduled ATMs in year 1 (2026) from the Airspace-CONOPS is generally correct and confirms consistency, not discrepancy. Scenario 2 includes 4 scheduled ATMs per day, specifically modelled using the																																																																																																									

			Boeing 737-800, which aligns closely with the annual figure of 1,192 ATMs (or approximately 3.3 per day) shown in the traffic forecast. This alignment demonstrates that the NIA uses realistic and conservative assumptions based on actual forecasted demand for the first operational year. However, Scenario 2 does not only include scheduled services—it also includes additional general aviation and training flights to reflect the broader operational mix expected during initial operations, bringing the total to 29 ATMs per day. This broader inclusion is necessary for modelling cumulative noise impacts, not just scheduled airline noise. Therefore, the figures used in Scenario 2 are both accurate and appropriate for environmental impact modelling and reflect the combined aviation activity at the airport—not just scheduled flights—ensuring that the NIA presents a complete and precautionary picture.
		e) By 2045, according to the Airspace-CONOPS report there will be a total of 50,041 ATMs per year (scheduled flights), which translates to 137 per day. Scenario 3 in the Noise Impact Assessment shows a total of 208 ATMs.	Specialist response: Duplication, no additional response.
		f) The split between scheduled flights versus General Aviation is not clear. Suffice to say that the Airspace-CONOPS report indicates GA peak hour demand movements per hour for 2030, 2035 and 2040, which reveals these totals: (i) 320 for 2030; (ii) 313 for 2035 and (iii) 200 for 2045. ⁶²	Specialist response: Duplication, no additional response.
		g) Seemingly the full operation situation (Scenario 3) which is given in the Noise Impact Assessment with a total of 208 ATMs does not correspond to the ATMs recorded in the Airspace-CONOPS report. If it is assumed that year 2045 represents full operation, then the total ATMs (scheduled flights and GA) amounts to 337. GA activity is predicted to decrease between 2035 and 2045.	Specialist response: Duplication, no additional response.
		h) According to CONOPS Airspace (refer to table below): “The current forecast of scheduled aircraft movements indicates an arrival and	Specialist response:

departure peak of 13 movements each per hour during the day. This forecast does not indicate the unscheduled (general aviation) peaks. Data on GA traffic from the previous provided forecast has been used. This has an arrival and departure peak of 12 movements each. This will lead to a combined peak of 50 movements per hour for the year 2045.”

Forecast Per Hour

ATMS: Peak Hour	Arrival / Departures	2030	2035	2045
Domestic	Arrivals	3	4	10
	Departures	3	4	10
International	Arrivals	2	3	3
	Departures	2	3	3
Total	Arrivals	5	7	13
	Departures	5	7	13

Source: 2022-08-29 Traffic Forecast (Consultants).xlsx

General Aviation	Arrival / Departures	2030	2035	2045
Total	Arrivals	20	19	12
	Departures	20	19	12

Source: 2022-07-08 CWA Traffic Prezo incl GA.pdf

Duplication, no additional response.

i) The above statement is difficult to relate to the ATMs that have been noted in the Noise Impact Assessment. If it is the case that there will be 50 movements per hour that the airport operates during the day. Assuming this means normal daytime working hours (i.e. 8 hours), this would amount to 400 ATMs (combination of arrivals and departures).

Specialist response:
Duplication, no additional response.

j) The lack of clarity regarding ATMs is exacerbated by the information provided in Table 16 (see overleaf) in the Draft EIAR.63. Some 30 ATMs are indicated for 2029, rising to close to 50 in 2032 and 100 in 2050. It is not stated whether these figures only relate to scheduled flights or

Specialist response:
Duplication, no additional response.

not. Given the reference to passengers, it might be assumed that GA is not included, but this must be made clear. There is no explanation of how these figures relate to those provided in the Airspace and CONOPS study or to the data applied for the purposes of the Noise Impact Assessment.

Table 16: Planning Activity Level linked to Phase 1 and Phase 2 (Capewinlands Aero (Pty) Ltd, Sept 2024)

PAL	PAL year	Million Annual Passengers (MAP)	Peak hr Pax		Commercial ATM annual	EIA Phases
			Two-way peak	Two-way peak hr		
1A	2029	1.7	1,100	9	11,150	Phase 1
1B	2032	2.5	1,400	11	17,800	
2	2038	3.5	1,700	13	24,750	Phase 2
3	2044	4.4	2,000	15	30,950	
4	2050	5.2	2,200	17	38,100	

121. In dealing with GA movements, the Airspace-CONOPS report mentions use of a cross runway in this regard. It is evident that a cross runway is required to deal with the air traffic volumes. This is shown in the ATMS (Air Traffic Management System) peak hour analysis (see also below table). ATMS peak hour shows the period of highest aircraft traffic intensity at an airport or in a specific airspace sector.

CWA Response: This comment is a duplication and has been addressed.

122. According to the Draft EIAR, this runway is to be closed as scheduled air traffic increases. The cross runway therefore remains in Alternative 2. The EIA Regulations require that all reasonable and feasible alternatives are to be assessed comparatively. Even if the cross runway will be closed at some stage, it is still necessary to consider the impacts associated with the Alternative that includes it. Neither Alternative 2 nor the possibility of a cross runway is mentioned in the Noise Impact Assessment, which means that it has not been comparatively assessed with the preferred alternative (Alternative 4). The use and redevelopment of a cross runway remains a possibility and is likely to have noise impact implications.

EAP response:

Alternative 2 entailed the construction of a 3.5km main runway at orientation 01-19 and initial retention of cross runway 14-32.

Alternative 2 consisted of 2 phases:

In Phase 1 two runways would be required:

- A primary runway of 3.5km for scheduled air traffic and high-performance business jets.
- A secondary cross runway of 700m for general aviation traffic and light aircraft operations during certain wind conditions.

In Phase 2 the secondary cross runway would be closed as the projected scheduled traffic increases and airspace safety, efficiency and capacity became

			key considerations. The timing of the closure of the secondary cross runway would be based on a multitude of factors and will follow a risk assessment, consultative process, and an assessment of market demand, ensuring that Phase 2 of the runway development is implemented at the appropriate time. Alternative 2 was found to be <u>not feasible</u> in terms of the cross runway and the airside layout required to accommodate the main runway, and subsequently it was excluded and developed into Alternative 3. The impacts associated with Alternative 2 were assessed and included in the EIAR and specialist reports where applicable. The cross runway was discarded prior to the completion of the impact assessment.
		123. Alternative 2 is an alternative to the preferred alternative, which initially was Alternative 3, which has been changed to Alternative 4. Both Alternative 3 and Alternative 4 exclude the cross runway. The fact that the cross runway is not included in Alternative 4 (new preferred alternative) does not remove the need to assess Alternative 2. As already noted, the cross runway is mentioned in the Draft EIAR as part of Alternative 2 - several times in fact.	EAP response: this comment has been addressed.
		124. It is not satisfactory from a noise impact point of view that no consideration has been given to noise impacts between the first year of operation, with 29 ATMs per day and what is termed 'full operation' in Scenario 3, with 208 ATMs per day. It can be seen from the Airspace-CONOPS report that ATMs increase substantially over time and year-on-year. Thus, a clear picture of how noise will change over time is not provided, which is important information for affected parties and for decision-making purposes.	Specialist response: The Noise Impact Assessment (NIA) adopts a phased and policy-aligned approach by assessing two key planning benchmarks: Scenario 2 (representing initial operations at 29 air traffic movements [ATMs] per day) and Scenario 3 (full operational capacity at 208 ATMs per day). This approach is consistent with standard environmental impact assessment (EIA) methodology and provides a conservative and informative depiction of the range of potential noise impacts from commencement to full build-out. While intermediate growth stages are not individually modelled, the progression in noise exposure is expected to be gradual and largely linear, given that aircraft types, flight paths, and runway configurations remain consistent throughout the planning horizon. The selected scenarios are based

			on realistic Planning Activity Levels (PALs) and align with the long-term traffic growth profile outlined in the Airspace CONOPS report. This method ensures that Interested and Affected Parties (I&APs) and decision-makers are provided with a clear lower and upper bound for anticipated noise impacts, supporting prudent land-use decisions and early-stage mitigation planning. Should more detailed analysis of interim growth phases be required, it can be incorporated at the post-authorisation stage through refinement of the Noise Mitigation and Management Plan (NMMP). As such, the current scenario-based modelling approach is both methodologically sound and sufficient for decision-making under the EIA framework.
		125.Comparing Scenario 1 with Scenario 2 in the Noise Impact Assessment, it can be seen that the Piper Warrior movements have reduced to 6 from 101; and the Cessna movements from 157 movements to 7. What has happened to the 150 Cessna and 95 Piper Warrior aircraft movements and where have they been relocated? What is the impact of moving these activities to another area (this is a potential cumulative impact issue that has not been addressed)?	Specialist response: Duplication of comment received. The reduction in Cessna and Piper Warrior movements between Scenario 1 and Scenario 2 reflects a change in operational assumptions, not a physical relocation of existing aircraft or air traffic. Scenario 1 models a No-Go scenario, representing the theoretical maximum use of the current airfield layout and its existing rights—primarily dominated by general aviation (GA) and flight training operations. Scenario 2, by contrast, represents the early phase of the new development, where operations are expected to shift toward scheduled commercial activity, with significantly fewer daily ATMs overall. The drop in GA training flights (e.g., Cessna 172s and Piper Warriors) does not indicate an immediate displacement but rather reflects a phased reduction in training intensity during initial commercial ramp-up. There is no evidence that these activities will be directly “moved” elsewhere. The potential for future redistribution of GA or training activity is speculative and outside the scope of the NIA’s project-specific impact focus. Cumulative impact assessments in EIAs are required for foreseeable and linked activities, not hypothetical movements of unaffiliated operations. Should any GA

			operator seek to relocate, those activities would be subject to their own planning and regulatory processes, including impact assessment if required. Therefore, the modelling change between scenarios is a valid, precautionary planning assumption and does not indicate a cumulative impact requiring additional analysis at this stage.
		126. In fact, the impact of the proposed expansion and upgrade of the CWA on existing businesses at the site is not discussed at all in the Draft EIAR. This is particularly relevant to the construction phase, when presumably it will not be possible for them to operate.	CWA Response: Consultations with on-site operators and businesses are ongoing with various options under consideration. Engagements are taking place with surrounding airfields who is willing and able to accommodate some of the operators currently based at CWA. These will serve as interim arrangements for the duration of the construction period which is envisaged to take place over a period of two years, after which they will return. It is important to note that upon their return they will be served with significantly improved airport infrastructure and systems. This will include, amongst other, runway navigational aids and lighting, Air Traffic Control and on-site Fire & Rescue services. CWA is committed to embrace, accommodate and facilitate the growth of the General Aviation sector in the Western Cape.
		127. The claim that the proposed expansion of the CWA aligns with Policy Statement 15 in the White Paper on Civil Aviation Policy (2017) is overstated. This policy statement supports “the upgrading of existing airports over development of green-field airports.” Both the Aviation specialist study and the Draft EIAR70 note this fact. The reason it is overstated is that the proposed CWA expansion involves a substantial extent of undeveloped land, including sensitive biodiversity areas.	CWA Response: CWA, in terms of its mandate, is not responsible to formulate policy, as an airport operator it follows policy. It therefore has the responsibility to develop and operate airports within recognised policy developed by the different authorities and regulators. As an existing, 81-year-old operational, licensed airport, the CWA application is to expand the airport, representing a natural evolutionary expansion of an existing airport to facilitate air services of a larger gauge and regularity. To achieve this, it will be using land that is both developed and not developed. In terms of biodiversity sensitive areas, both terrestrial and wetlands, these areas impacted upon have been duly identified by the relevant expert specialists and appropriate off-set programs have been identified and recommended for implementation. CWA as the developer have formally

			committed to these off-set programs and will be a condition of approval, should authorisation be granted for this development to proceed.
		128.Since Scenario 1 is used as the baseline situation, it is no surprise that the following statement is made in the Draft EIAR: “However, the peak general aviation traffic under Scenario 3 will not exceed the current maximum operational capacity of Scenario 1, the No-Go Alternative. 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.” (emphasis added) ⁷¹ This statement is highly problematic.	EAP response: This comment has been addressed
		a) It should be noted that this statement does not come from the Noise Impact Assessment and thus is seemingly the EAP’s interpretation. As such it is a misrepresentation of the factual information. In fact, the Noise Impact Assessment appears to indicate the opposite. For example, the extent of the area impacted as indicated by the N70 contour for full operation of an expanded CWA is far larger than that for Scenario 1 (full operation of current facility – which is not occurring in reality and is therefore irrelevant in this context).	EAP response: the statement is from the Noise IA – top of page 4-7.
		b) In fact, the Noise Impact Assessment states that the 55 dB(A) contour for Scenario 3 (full operation of proposed expanded CWA) cover a 10.3 km ² area, compared to Scenario 1, which will cover an area of 2.5 km ² (full capacity of CWA with 4 runways in operation). Whilst Scenario 1 obviously does not include scheduled flights (i.e. only general aviation), Scenario 3 is understood to include scheduled flights and general aviation activities. Thus, it cannot be factually correct to state: “the noise levels due to the general aviation operations will always be lower than those with the existing operations at full capacity.” true possible to that the state: <u>The noise specialist</u>	EAP response: The statement is by the Noise specialist therefor credible. <u>NOTE: the text in the comment was cut off in the original submission.</u>
		c) Scenario 1 does not represent the current situation and thus I&APs are effectively being asked to assess the noise impacts of	EAP response: this comment is a repeat and had been addressed.

		the proposed CWA expansion with a theoretical or imaginary scenario. Existing (actual current) operations are some one-third of what is reflected in Scenario 1.	Specialist response: The observation that parts of the 55–60 dBA noise contour extend over areas that are not strictly “urban residential” is noted. However, the application of the SANS 10103 guideline levels is context-dependent and intended to provide indicative thresholds based on the prevailing or planned land use, not solely on existing classifications. In environmental assessments, SANS 10103 allows for flexibility in interpreting compatibility based on zoning intent, development frameworks, and ambient conditions—not just current land use. The observation that Scenario 3’s 55–60 dB(A) noise contours extend over rural areas is accurate, but the conclusion drawn is misleading and overlooks key planning and regulatory context. First, the Noise Impact Assessment (NIA) correctly applies SANS 10103, which is the relevant and legally applicable South African standard. This standard does not require uniform land use classification across a contour, but rather uses contextual thresholds for zones ranging from rural to urban, and provides flexibility based on actual and intended land use. In areas classified as rural or agricultural, noise exposure within the 55–60 dB(A) range is not automatically deemed unacceptable, particularly when those areas are adjacent to aviation infrastructure. These contours are informative planning tools, not exclusion zones. Furthermore, land use planning can adapt through zoning restrictions, buffer areas, and noise-compatible development controls—all of which are part of the mitigation strategies proposed in the DEIR and the future Noise Mitigation and Management Plan (NMMP). It is also important to clarify that the SANS 10103 “urban residential” guideline of 55 dBA LAeq serves as a reference for managing community exposure and potential annoyance, not as an absolute limit. The modelled noise levels of 55–60 dBA in Scenario 3 represent long-term average outdoor sound exposure under a conservative “busy day” assumption and do not equate to continuous exceedance.
		129. The noise contours in Figure F-5 shows that noise levels of between 55 and 60 dBA, which applies to Scenario 3, extend over existing rural areas both to the north and south of the site. Whilst this might meet South African standards (SANS 10103) guideline level of 55 dB(A) for Urban Residential Districts, the land use cannot be described as urban residential across the entire area that falls within this 55 dBA contour range. Furthermore, 55 and 60 dBA are above the level recommended for outdoors by the EPA as mentioned earlier in this section. It also exceeds the updated average noise exposure guideline from the WHO of < 45 dBA.⁷⁴	

			Regarding the EPA and WHO guidelines, it is acknowledged that these recommend lower thresholds (e.g., WHO's 2018 Environmental Noise Guidelines suggest $L_{den} < 45$ dBA to avoid certain health outcomes). However, these guidelines are aimed at long-term public health policy targets and are not directly used for land-use compatibility determinations or regulatory compliance in South Africa. In practice, few international or national airport noise assessments are able to fully meet these WHO guideline values due to the nature of aviation activity, and such levels are typically used for aspirational or strategic planning rather than impact determination at project level. The noise modelling in Scenario 3 remains within accepted South African standards (SANS 10103) for environmental noise, and the assessment has used a conservative methodology. Where sensitive receptors fall within elevated contours, further mitigation—such as land-use management, building design guidance, or operational controls—can be explored through the Noise Mitigation and Management Plan (NMMP).
		130. There is a general tendency to respond to I&AP questions in a non-specific manner. For example: Question: Where will speed reduction on approach take place? Cape Town Airport uses the airspace over Wellington for this and is quite noisy at times? Answer: For Cape Winelands Airport (CWA), speed reductions on approach will be designed to minimise noise impacts and will occur at altitudes and distances that comply with noise abatement procedures and regulations” and “Once the flight paths are confirmed, there will be a firmer indication of where this will be observed.” This answer means that information on noise impacts is inadequate, because a very fundamental concern cannot be answered. Instead, a nebulous response is given about careful design of flight paths to minimise noise. It is inconceivable that there is insufficient information to answer this question, when noise is an obvious and significant concern associated with airports. Under such circumstances, it would be expected that comprehensive information would be obtained so as to answer such questions definitively – that is, with credible and comprehensive data.	EAP response: This comment is a duplication and has been addressed. Specialist response: The Noise Impact Assessment (NIA) uses conservative “busy day” operational scenarios and known aircraft types to model cumulative ground-level noise exposure. These assessments are designed to inform decision-making even in the absence of finalised procedures, and they rely on realistic assumptions that typically result in worst-case noise estimates. Once flight paths and operational procedures are confirmed through regulatory processes, detailed information, including descent profiles and speed management zones, will become available. This will also be accompanied by real-world validation through the continuous noise and flight

			tracking system to be implemented as part of the Noise Mitigation and Management Plan (NMMP). The response provided regarding approach speed reduction reflects the current stage of airspace and procedure design, which is iterative and must comply with civil aviation regulatory processes, including stakeholder engagement, safety assessments, and noise abatement planning. At this stage, specific vectoring points such as exact locations for speed reduction or descent initiation cannot be fixed with certainty, as they are subject to final airspace design, aircraft performance profiles, and coordination with the South African Civil Aviation Authority (SACAA) and Air Traffic and Navigation Services (ATNS). It is not a matter of withholding information but rather of not pre-empting procedural outcomes before they are formally validated. The principles guiding these procedures, including continuous descent operations (CDO), minimum noise routing, and avoidance of densely populated or noise-sensitive areas, are already embedded in the noise modelling assumptions and in the planning of airspace design. In summary, the response provided was appropriate and aligned with the planning phase of the project. The current level of detail is consistent with regulatory norms at this stage of an environmental assessment, and further refinement will follow through mandated airspace design and implementation procedures.
		131.A cumulative airspace and noise impact study has not been undertaken. CWA could impact the airspace and procedures into CTIA. ACSA noted in their comments that this could also potentially result in higher noise footprint at CTIA, inefficient flight paths and increased fuel burn for airlines flying into CTIA. These issues / concerns have not been addressed.	EAP response: This comment is a duplication and has been addressed. Specialist response: A cumulative airspace assessment will result from structured coordination between the Cape Winelands Airport (CWA) project team, the South African Civil Aviation Authority (SACAA), and Air Traffic and Navigation Services (ATNS), as part of the formal airspace change process that follows environmental authorisation.

			Preliminary coordination with SACAA and ATNS has already taken place during the development of the Airspace Concept of Operations (CONOPS), and a detailed cumulative airspace assessment will be finalised during the formal airspace change process. The Airspace Concept of Operations (CONOPS), which forms part of the EIA documentation, specifically addresses integration with existing regional airspace users, including Cape Town International Airport (CTIA), and has been developed in alignment with regulatory requirements for safe and efficient airspace design. It is important to distinguish between cumulative airspace design considerations and cumulative noise impact on third-party airports. The CWA airspace has been conceptualised in a way that ensures vertical and horizontal separation from CTIA traffic flows, and procedures are subject to review and approval by SACAA and ATNS, whose core mandate includes maintaining airspace safety, efficiency, and minimising conflict between flight paths. These authorities would not approve procedures that compromise operational safety or cause significant inefficiencies for existing operators. With respect to cumulative noise, the Noise Impact Assessment (NIA) focuses on the ground-level impacts around CWA, which are the subject of this environmental authorisation process. Including CTIA's separate noise footprint in a cumulative contour is not a standard EIA requirement, particularly given the significant physical separation between the two airports (~25 km), distinct flight corridors, and differing operational scales and trajectories. The potential for regional airspace inefficiencies or interaction between airports will be comprehensively addressed at the airspace design implementation stage, as required under SACAA's Airspace Change Process. If any significant overlap or inefficiency were to be identified, these authorities have the procedural mandate to adjust routing, altitude profiles, or scheduling as needed. Therefore, while a cumulative noise contour is not presented, the broader airspace integration and coordination processes are well accounted for, and no material omission has occurred in the EIA from a regulatory or technical perspective.

		132. One of the most significant shortcomings in the impact assessment is the lack of consideration of who or what will bear the cost of noise impacts versus who or what will gain. The costs of noise impacts associated with an expanded CWA will be borne by communities that live adjacent to or in close proximity to the CWA and not by the clientele that will use this facility. This represents an unequal spread of one of the most material social and environmental costs versus the convenience offered by having a second airport in Cape Town as pointed out in the Draft EIAR.	EAP response: This comment is a duplication and has been addressed.
		133. It is inconceivable that there have been no changes to the Noise Impact Assessment since it was issued as part of the suite of documents associated with the initial Draft EIAR in November 2024. This shows that despite the ongoing concerns raised by I&APs, no additional investigation or analysis has been undertaken. This demonstrates that the minimum-level of investigation and evaluation to address the issue has been performed, which is wholly unacceptable given the level of concern and potential severity of the aircraft noise impact.	EAP response: This comment is a duplication and has been addressed. Specialist response: Where relevant, the DEIR and associated responses have expanded contextual explanations and clarified findings based on stakeholder input. However, the core modelling assumptions and scenarios remain appropriate and unchanged, as no new data or material change to the development footprint has warranted an alteration to the model outputs. Moreover, I&AP concerns have been meaningfully addressed through the proposed development of a Noise Mitigation and Management Plan (NMMP), which will allow for refinement, monitoring, and adaptation during implementation. The NIA provides a legally defensible and technically sufficient foundation, and the absence of a re-issued version does not indicate neglect, but rather that the existing assessment continues to meet regulatory and planning standards.
		134. The noise exposure impacts are considered to be understated. For Scenario 3, the probability of the impact is given as 'probable', whereas it ought to be definite. Furthermore, inadequate consideration has been given to thresholds in the significance criteria. In other words, it should be	Specialist response: This comment is a duplication and has been addressed.

		specifically considered as an additional criterion, as to whether thresholds will be exceeded (e.g. the N70 – occurrences of exceedance of 70 dBA) and if so, this ought to be regarded as being of very high severity. It is questionable as to whether the applying uniform criteria across all environmental impacts is effective and noise is one area where issue-specific criteria would provide much better insight into the severity of the impacts against credible international thresholds.	
		135.Only one impact is identified in the Noise Impact Assessment, thereby blurring any differentiation between different noise-related impacts. It is inconceivable that the consequences of aircraft noise can all be placed under one impact for construction and one impact for the operational phase of the proposed project (Tables 5-3 and 5-4 in the Noise Impact Assessment). In this way nuances are lost. For example, impacts on sensitive receptors are not considered in and of their own right. Similarly, impacts on birds, farming operations, rural areas versus urban land uses are not detailed. Impacts on health are ignored. Impacts of singular noise incidents associated with take-off and landing and / or more noisy aircraft that may use the airport are not assessed. Nighttime versus daytime impacts are not assessed. Noise induced vibration is not considered.	Specialist response: This comment is a duplication and has been addressed.
		136.The impact significance assessment does not include any comment on reversibility of impacts as required in terms of the EIA Regulations.	Specialist response: This comment is a duplication and has been addressed.
		137.The impact significance cannot in all reasonableness be downgraded to medium after mitigation, especially as the effectiveness of these proposed mitigation measures is an unknown quantity.	Specialist response: This comment is a duplication and has been addressed.
		a) Firstly, mitigation measures are highly reliable on other landowners altering their plans / intentions in order to adjust to an impact that is being imposed on them.	Specialist response: This comment is a duplication and has been addressed.

		b) Secondly, it is unclear how much control the airport will have over altering flight paths, descent angles and the like.	CWA Response: Specialist teams in airspace design and operations will undertake the finalisation of the airspace design, encompassing the configuration of flight paths, route structures and prescribed departure and descent profiles. These elements will be codified through detailed procedure sets known as Standard Instrument Departures (SIDs) and Standard Terminal Arrival Routes (STARs). The design process will rigorously account for key operational parameters, including aviation safety, airspace capacity, procedural efficiency and environmental considerations such as noise mitigation. The work will be done in close coordination with Airport Air Traffic Control, Airline Flight Operations departments, and regulatory authorities including the South African Civil Aviation Authority (SACAA). Once finalised, adopted and published, the Airport Noise Monitoring Committee will monitor compliance with the designed procedures and noise levels on an ongoing basis. In the event of and where there is undue deviation corrective action will be taken with the offending airline. An acceptable deviation will be a deviation taken by the Commanding Officer of an aircraft in the interest of safety or in the event of an emergency. The Noise Monitoring Committee will consist of airport and airline representatives but will also offer representation to neighbouring communities, farmers and developers. CWA is committed to a transparent and collaborative approach, as a responsible airport developer and operator.
		c) Thirdly, options such as reducing the runway length or altering the site layout have not been considered.	EAP response: This comment is a duplication and has been addressed.
		d) Fourthly, it is mentioned that noise insulation on residential dwellings and noise-sensitive buildings (schools, hospitals, etc.) may be considered, without any detail as to who the responsible party would be and how this might be implemented.	Specialist response: This comment is a duplication and has been addressed.

		e) Lastly, given the uncertainties in the information base (e.g. as regards ATMs, for example) and the fact that the analysis of noise information is considered inadequate and insufficiently nuanced to give a details and clear picture of the potential impacts, neither the significance rating pre mitigation nor that post-mitigation are considered sufficiently reliable, especially for decision making purposes. Such mitigation measures are difficult, if not impossible to incorporate into an Environmental Authorisation.	Specialist response: This comment is a duplication and has been addressed.
		138. When describing the ambient noise level in Fisantekraal the following is stated in the Draft EIAR and the EMP: “The current noise levels at the Fisantekraal residential area exceed the SANS guideline levels for Urban Districts, with the main noise sources being human activities and vehicular traffic on the local road network. The daytime noise level was around 58dB(A) and the night-time 49 dB(A). These noise levels exceeded the SANS guideline level of 55 dB(A) for Urban Residential Districts.” No reference is given for this statement and it does not correspond to the ambient noise information in the Noise Impact Assessment.	Specialist response: The ambient noise levels cited in the amended DEIR and EMP for the Fisantekraal residential area—58 dB(A) during the day and 49 dB(A) at night—are consistent with typical measured levels in peri-urban or semi-rural residential environments, particularly those with road traffic and human activity as dominant noise sources. These values fall within the range commonly recorded in field studies and align with general expectations for mixed-use fringe areas. While the Noise Impact Assessment (NIA) may present ambient levels differently or draw from a different dataset or modelling assumption, the values stated in the DEIR/EMP are not contradictory, but rather complementary, reflecting additional context or site-specific observations made during the broader EIA process. Minor variation between noise baselines across documents is not unusual, particularly when measurements are taken at different times or reference different receptor points. Importantly, whether ambient noise is 55 dB(A) or 58 dB(A), the distinction does not materially affect the assessment outcome—the area is already above the recommended SANS 10103 guidelines, confirming that noise sensitivity exists and justifying the proposed mitigation and management measures. The core finding—that the area experiences noise levels above SANS residential guidelines—is valid, appropriately stated, and aligned with the precautionary approach taken in the EIA. The noise levels in the Fisantekraal area were established via noise measurements over several days and are presented in the NIA report, as well as a separate Baseline Noise Assessment report.

		139.The difficulty with the above statement is that it creates the impression that these noise levels represent the standard / typical state of affairs in Fisantekraal. In all the time that the EIA process has been progressing, only one monitoring event has taken place and that was during April 2022.	Specialist response: This comment is a duplication and has been addressed.
		140.The fact that current noise levels in Fisantekraal are reported in this manner is disingenuous. It is not clear where this information comes from since the Noise Impact Assessment says: “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 means that over the period of continuous monitoring (17-22 April 2022), the SANS noise level only one exceedance of this noise level is specifically mentioned in the Noise Impact Assessment. Thus, the description provided by the EAP in the Draft EIAR and the EMPr is factually incorrect.	Specialist response: This comment is a duplication and has been addressed.
		141.It is difficult to orientate location and positions on the diagrams provided in the Noise Impact Assessment because of the opaque background used and the limited number of locational indicators / labels (e.g. Figure 4-10 – 4-16). These diagrams are provided using Google Earth images but in the Appendices. The logic for this approach is unclear, because it is surely easier for the reader to orientate himself / herself using the Google Earth images in tandem with the explanatory text. Suffice to say that this manner of presenting information does not serve the clarity of a complicated subject well and it is improbable that it makes the information more accessible or easier to understand.	Specialist response: This comment is a duplication and has been addressed.
		142.The mitigation hierarchy has not been adequately applied. In fact, there is a tendency to rely on surrounding land uses to make adjustments to their planning to address noise impacts. This is incorrect application of the mitigation hierarchy. In the first instance, measures to avoid impacts are required and where this is not practically possible, impacts must be	Specialist response: This comment is a duplication and has been addressed.

		minimised. As part of minimisation the most conservative thresholds ought to be considered, which has not occurred in this case.	
		143. In the EMPr the following is stated: "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. For this reason, the compilation of a Noise Mitigation and Management Plan (NMMP) will take place post authorisation." If this is the case, then on what basis were the post mitigation impact significance ratings shown in the Noise Impact Assessment determined? Was it assumed all of these measures were implementable and would be effective?	Specialist response: This comment is a duplication and has been addressed.
		144. The above is contrary to the precautionary principle as well as the objectives of EIA. Effectively, Environmental Authorisation is being sought for a proposed project, where the consequences associated with a key impact (noise) are not fully understood, have been incompletely investigated and the mitigation measures have a high-level of uncertainty. Incidentally, this point is relevant to other impacts, such as those in related to biodiversity.	Specialist response: This comment is a duplication and has been addressed.
		145. The reality is that insufficient attention has been paid to the options for adjustment that could be made to avoid or at least minimise noise impacts. Reliance is placed on other parties to adjust their planning to cater for the fully expanded CWA proposal. Options such as a shorter runway, a smaller land-side and air-side development footprint have not been considered.	Specialist response: This comment is a duplication and has been addressed.
		4.3 Key points – in summary	-
		146. The foregoing discussion points to a wholly inadequate approach to the investigation, assessment, significance determination and mitigation of a materially important impact associated with the proposed CWA	Specialist response: This comment is a duplication and has been addressed.

		expansion. Assessment of the intensity or severity of noise-related impacts as presented in the Noise Impact Assessment and the Draft EIAR cannot be relied upon.	
		147. Not all noise-related impacts have been identified and assessed and thus the Noise Impact Assessment itself is incomplete.	Specialist response: this comment is a duplication and has been addressed. The assertion that the Noise Impact Assessment (NIA) is incomplete because “not all noise-related impacts have been identified and assessed” is incorrect. The NIA has assessed all relevant and material noise-related impacts required under South African EIA legislation and in line with SANS 10103 and SANS 10117, which set the national standard for environmental noise assessment. The assessment includes: • Cumulative noise exposure (Ldn), • High-noise event frequency (N70/N60), • Day vs. night impacts with penalty weighting, • Impacts on sensitive receptors (residential, institutional, rural), • Flight path-based contour mapping, and • Phased operational scenarios for both early-stage and full build-out conditions. Where relevant, the NIA also acknowledges the potential for further refinement through the Noise Mitigation and Management Plan (NMMP), particularly once detailed flight paths and operational procedures are finalised through regulatory aviation processes. Furthermore, issues such as impacts on biodiversity, vibration, or indirect socio-economic effects are addressed in other specialist studies within the DEIR, in accordance with the multidisciplinary nature of EIA. The NIA is therefore not incomplete—it is scoped appropriately, integrates conservative modelling, and forms part of a comprehensive and coordinated environmental assessment
		148. The deficiencies in the manner in which noise impacts have been addressed is material and significant. Insufficient information in this regard is available to the decision-maker. This fact alone means that the Draft	Specialist response: This comment is a duplication and has been addressed.

		EIAR is fatally flawed – particularly because noise related to aviation activities is an established major environmental concern internationally and it is a long-term, in fact permanent impact. It also means that information for decision-making purposes is incomplete and inadequate.	
		5. Concluding remarks	-
		149.The United Nations Environment Programme (UNEP) definition of EIA as “a tool used to identify the environmental, social and economic impacts of a project prior to decision-making. It aims to predict environmental impacts at an early stage in project planning and design, find ways and means to reduce adverse impacts, shape projects to suit the local environment and present the predictions and options to decision-makers.” ⁷⁸ The process followed for the proposed expansion of the CWA has not met the intention of an EIA process as expressed in this definition.	EAP response: This comment has been addressed.
		150.Over time, the role of EIA has broadened to include consideration of sustainability principles and policy frameworks – known as sustainability-led EIA. This is true internationally and is also clearly evident in the legislation that governs EIA in South Africa. Thus, EIA is not just concerned with providing project level environmental impact information for decision-making purposes. It also requires consideration of the nature of the environmental impacts and their significance within the context of sustainability principles, policies, strategies and plans since these reflect the desired state of the environment. This has not been achieved in this EIA process.	EAP response: This comment has been addressed.
		151.A sustainability-led EIA approach is required in order to align with the objectives and principles of the National Environmental Management Act (Act 107 of 1998) – NEMA. The preamble of NEMA states that “sustainable development requires the integration of social, economic and environmental factors in the planning, implementation and evaluation of decisions to ensure that development serves present and future generations.” Furthermore, sustainability principles are included in the Act (section 2) and encompassed into the objectives of Integrated	EAP response: this comment has been addressed.

		Environmental Management in Chapter 5, under which the EIA Regulations are promulgated.	
		152.A comprehensive, scientifically rigorous, participative process must be followed, which is undertaken in an independent manner. A process that is independent envisages one that is impartial and is neutral insofar as the interests of the developer are concerned. The EIA has a particularly important role to play because it is the vehicle through which the sensitivity of the environment is expressed. If this is not done with due care, there is a risk of irreversible loss of precious resources and irreversible damage to life-support systems, among others, with severe consequences for human communities. The EIA also serves as a means for interested parties, local communities, non-profit organisations, research organisations, relevant authorities etc. to express their concerns, and very importantly share their local knowledge. The value of this should never be discounted and in fact, it is to the advantage of the EIA process to actively seek these inputs. In addition, the EIA process must show awareness of and sensitivity to social conditions and needs.	EAP response: This comment has been addressed.
		153. There is a wide array of issues that need to be considered, evaluated and accurately recorded in order for the decision-maker to be provided with adequate information for decision-making purposes. This means that a significant responsibility falls on the shoulders of the professionals involved in conducting EIAs to ensure that sufficient accurate and scientifically sound information is provided and is assessed on the basis of a precautionary approach, especially where information is limited. EIA is not intended to be a mechanistic and tick-box exercise or to involve providing information that is not relevant to the issue at hand, as has been pointed out in several instances in the case of the Draft EIAR.	EAP response: This comment has been addressed.
		154. A key question to be answered is whether the project is aligned with the 'desired future state' of the area. Another key question to be answered is what trade-offs does the proposed project involve – who / what stands to gain and who / what stands to lose. The EIA process for the proposed expansion of CWA has not addressed this question adequately.	EAP response: This comment has been addressed.

		155.The proposed development as envisaged by the ‘preferred alternative’ is not aligned with various policies, plans and / or strategies. In fact, this issue has been addressed in a skewed manner, focusing on policies, strategies and plans that have some element that may be used, no matter how obscurely, to demonstrate alignment, without affording the same level of attention to policies, plans and strategies that show the reverse (i.e. no alignment evident). As a result, the EIA process has been focused on finding a rationale for not meeting the applicable policy objectives and on motivating the proposed project. This runs counter to the objectives and purpose of environmental impact assessment, particularly in the context of the shift in focus from merely assessing impacts to a sustainability led impact assessment approach. It also runs counter to the NEMA principles (section 2) and the objectives of Integrated Environmental Management (section 23).	EAP response: This comment has been addressed.
		156.The foregoing discourse means that the adequacy of an EIA process is not only to be judged on whether all of the legally required steps in the process have been fulfilled. It is also to be judged on whether it has addressed the question of the sustainable development context, as reflected in policies, plans and strategies. There are numerous weaknesses and shortcomings in the Draft EIAR including information gaps, incomplete / missing information, gaps in the identification of impacts, inaccurate and cursory treatment of environmental sensitivities, poor application of the mitigation hierarchy, to mention a few. Suffice to say that the Draft EIAR has been found wanting as detailed in this report and is regarded as inadequate for decision-making purposes.	EAP response: This comment has been addressed.
		ANNEXURE B: Sound Research Laboratories South Africa Review dated 20 March 2025. Greenville Garden City Comparison of Apparent Discrepancies of Noise Contours Between Cape Winelands Airport Expansion and Cape Town International Airport There appears to be a significant difference between the noise contours from two sources:	Response from Noise Specialist: The document attempts to compare the Scenario 4 noise contours of Cape Town International Airport (CTIA), which includes a realigned runway, with those of Scenario 3 for Cape Winelands Airport (CWA). It further associates the number of domestic travellers with the respective noise contours and

		1) Noise contours of the Cape Town International Airport (CTIA) overlaid on the Cape Winelands Airport (CWA) site by MLH Architects and Planners (Figure 1) 2) Noise contours of the CWA as provided in the Noise Impact Assessment submitted by CWA dated March 2025 (Figure 2). For ease of comparison, MLH has shown the CWA noise contour in the same manner as the CTIA contour. The difference between the two noise contours is severe, with the CTIA noise levels approximately 10 dBA higher than the contours submitted by CWA for the proposed airport. The Cape Winelands Aero press release dated 2023/12/12 states: “The airport will effectively process 2,000,000 international tourists and 3,000,000 domestic travelers per annum by 2050, taking the overall annual passenger traffic to the region from 10 million to 20 million passengers”. Stating that the plan is for CWA to effectively double the passengers implies that the activity at CWA will rival the activity at CTIA. This is not reflected in the noise contours. Put very simply, a difference of 10 dBA requires 10 times less activity at CWA than at CTIA. It is not clear how the intended use of the CWA—as stated by Cape Winelands Aero—will be done within noise contours 10 dBA quieter than CTIA. I am concerned that the actual noise levels of the CWA when operated as intended will be similar to CTIA, with a severe noise impact on the Greenville Garden City residential zones.	questions how CWA appears to be quieter than CTIA. This comparison, however, is technically inappropriate and misleading for several key reasons: Noise contours are determined by aircraft operations, not passenger volumes. The number of passengers passing through an airport has no direct influence on noise contour modelling. Instead, contours are derived from the number, type, timing, and frequency of aircraft movements. CTIA Scenario 4 reflects a much higher number of aircraft operations. The CTIA model includes 677 operations, compared to just 208 in CWA’s Scenario 3. A lower number of operations directly results in reduced cumulative noise levels and smaller contours. Night-time operations significantly affect noise calculations. CTIA’s model includes 62 night-time flights, while CWA includes only 3. As per standard noise modelling practices, night-time operations carry a 10 dB penalty due to their greater impact on community sensitivity, which substantially enlarges CTIA’s contours. The aircraft fleet mix differs considerably between the two scenarios. At CTIA, 629 of the 677 operations are performed by large aircraft, with only 48 by light aircraft. In contrast, CWA’s 208 operations consist of 114 large aircraft and 94 light aircraft. Since large aircraft produce significantly higher noise levels, CTIA’s contour is understandably broader. For these reasons, the direct overlay of CTIA’s contours onto the CWA site—as presented in the comparison—does not yield a valid or meaningful

assessment of noise impacts. The methodologies and input parameters underlying each set of contours are fundamentally different and must be interpreted within their respective operational contexts.

For context on the noise levels, note that according to the district noise zones in SANS 10103:2008:

- The orange contour “70–75 dBA” exceeds the daytime district noise level for Industrial zones
- The dark green, yellow, and orange areas all exceed the daytime district noise level for urban districts with business premises and main roads.

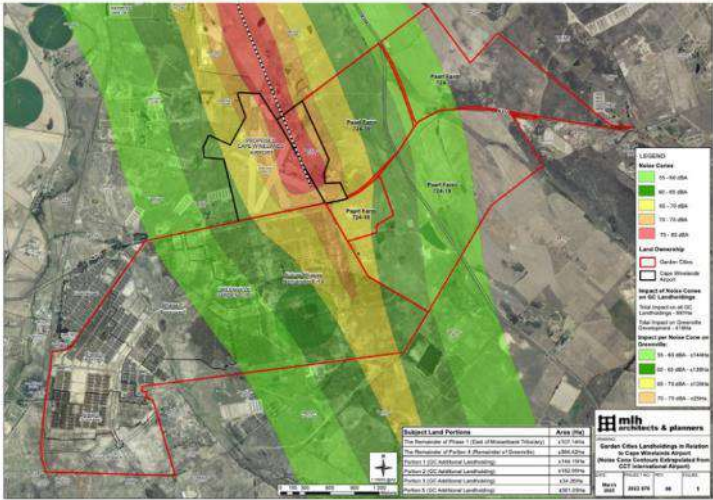


Figure 1: Noise contours of the Cape Town International Airport (CTIA) overlaid on the Cape Winelands Airport (CWA) site by MLH Architects and Planners

Specialist response: This comment has been addressed above.

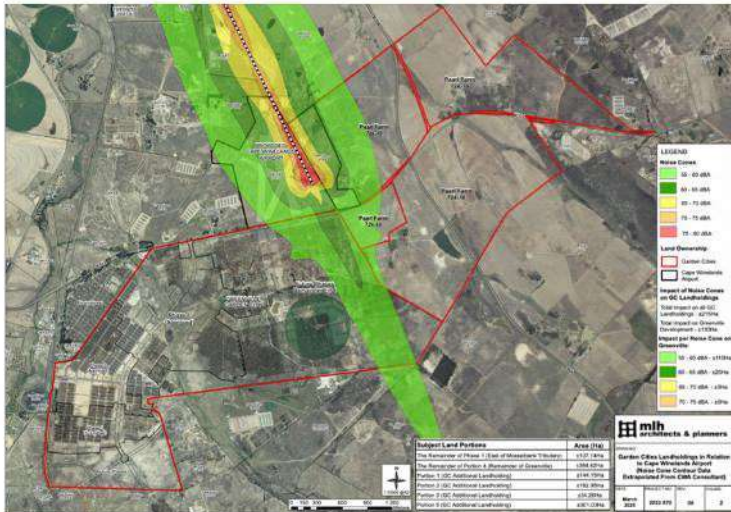


Figure 2: Noise contours of the CWA as provided in the Noise Impact Assessment submitted by CWA dated March 2025

ANNEXURE C: Sound Research Laboratories South Africa Review dated 10 April 2025.

Greenville Garden City

Comments on Revised Noise Impact Assessment Report (March 2025)

I have reviewed the revised Noise Impact Assessment Report for the above project. The report is marked as March 2025 but still dated October 2024 on the second page, where it is labelled as "2nd Draft".

Modifications are not marked or tracked between the two reports, leaving the reader to try to find changes. From my reading, there seem to be no substantial changes in the report. I noted the changes listed below. These amount to fixing of typographical errors and references that I noted in my first review. I could not find any changes to the content, analysis, conclusions, or recommendations in the report.

-

Response from Noise Specialist:

We confirm that the changes made in the second draft were underlined for clarity. These changes were limited to typographical corrections, formatting adjustments, and updates to references, as noted.

We further confirm that no changes were required to the analysis, conclusions, or recommendations. The technical content of the report remains consistent with the original submission, as no substantive issues were raised in the initial review that warranted modification to the core findings.

		1) Page 2-7: removed the “??” at end of section 2.4.1 2) Page 3-3: Figure 3-1 now labels the measurement points 3) Page 4-1: Updated BS5228 standard reference date from 1984 to the current 2009	
415	Susan Rheeder - Joostenbergvlakte Community Forum	Email dated 13 May 2025: 1. Kindly find attached the JCF’s comments re above mentioned development.	Email response provided 14 May 2025: 1. Thank you for the email and the comments submitted
		Letter received via email dated 13 May 2025: PROPOSED EXPANSION OF CAPE WINELANDS AIRPORT - IN-PROCESS EIA REPORT FOR PUBLIC PARTICIPATION (DEA&DP REF: 16/3/3/2/A5/20/2046/24) The Joostenbergvlakte Community Forum (hereinafter referred to as the JCF, thank PHS Consulting for the opportunity to comment as well as the extended period to comment, although it was impossible to study all 6 000 pages in depth.	-
		1. PUBLIC PARTICIPATION PROCESS 1.1. Even though the fact that the JCF requested that documentation be provided to the residents in Afrikaans, we were informed that all documentation is only available in English. Only the abbreviated version is available in all three official languages. Although the JCF's communication is in English, we have elderly residents who cannot manage 6 000 pages in English. Therefore, we requested that a meeting, similar to the one held in Fisantekraal, be held in Joostenbergvlakte so that residents can get first-hand information and ask questions. There should preferably be an Afrikaans and English speaker present. It must be kept in mind that the average person on the street does not understand the technical terms and processes that professionals take for granted every day. Therefore, public meetings are crucial so that people can obtain first-hand information from developers. Residents have a right to hear how a development will affect their environment, quality of life, investment, etc. Most people living in	EAP response: To date all registrations, emails and comments received from JCF have been in English. Based on comments received from this IAP, the executive summary was translated from English into IsiXhosa and Afrikaans. The EAP has notified registered IAPs (including those from Joostenbergvlakte) of PPP and the electronic files were placed on the PHS Consulting website for all IAPs to access and comment on. Two public open days were held during the EIA Phase, 20 November 2024 and 15 April 2025, and 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. IsiXhosa and Afrikaans translation abilities were present during the public meeting and the open day, and site notices and adverts were also translated to Afrikaans and IsiXhosa.

		Joostenbergvlakte bought here to retire. These smallholdings are a legacy for the next generation.	Refer to Appendix 40 for detail on PPP process.																										
		1.2. In the CR29 report we asked why Bloekombos was not also notified of the public participation. The answer to that was that their community leaders did not request to register as I&APs.	EAP response: Noted																										
		1.3. Isn't it the developer's prerogative to notify the leaders? These people need information and documentation in their language. They have a right to be known during the public participation processes. At this stage they have no knowledge of the consequences of this development.	EAP response: Refer to Appendix 40 for detail on PPP process.																										
		1.4. Have the following farms/properties in Joostenbergvlakte been notified? These farms are situated on the Southern side of the proposed airport within Joostenbergvlakte. <table><thead><tr><th>Portion</th><th>Farm</th></tr></thead><tbody><tr><td>6</td><td>726</td></tr><tr><td>1</td><td>733</td></tr><tr><td></td><td>733</td></tr><tr><td>22</td><td>727</td></tr><tr><td>24</td><td>727</td></tr><tr><td>36</td><td>728</td></tr><tr><td>34</td><td>728</td></tr><tr><td>43</td><td>728</td></tr><tr><td>38</td><td>728</td></tr><tr><td>12</td><td>726</td></tr><tr><td>14</td><td>726</td></tr><tr><td></td><td>726</td></tr></tbody></table>	Portion	Farm	6	726	1	733		733	22	727	24	727	36	728	34	728	43	728	38	728	12	726	14	726		726	EAP response: The adjacent landowners to the CWA site were identified and notified within the Scoping pre-application phase, as per NEMA requirement.
Portion	Farm																												
6	726																												
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		2. TRAFFIC IMPACT During the Focus Group Discussion at Goedgeleven Venue on 15 April 2025, we were advised that Lucullus Road will not be used in any way. In the Draft EIAR of 18 March 2025, Point 8.14.1 on page 631, Lucullus Road is referred to as the preferred initial road.	Response from ITS: Lucullus Road is not a requirement to accommodate airport traffic, but certainly be beneficial should it be constructed. It must also be clarified, that Lucullus Road is referred to as two sections, north of Lichtenberg Road and the section between Lichtenberg Road and the N1. The section north of Lichtenberg is certainly preferential, but can only be constructed once the																										

	Lucullus Road runs through the preserved smallholding area of Joostenbergvlakte which is a small but close-knit equestrian community. During the City of Cape Town's Public Participation in 2024 regarding the widening of Lucullus Road, the community indicated that they were completely opposed to it. Suburbs such as Joostenbergvlakte and Durbanville are currently experiencing the danger of defragmentation. Should the widening of Lucullus Road be approved, then approximately 200 properties will be wholly/partially expropriated and some properties whose houses are to be demolished. More and more people want to move from the urban area to rural/agricultural areas for the peace and quiet. As an equestrian and rural community, where should the residents of Joostenbergvlakte go with the large numbers of animals currently in the area? The Rural community of Joostenbergvlakte will definitely oppose the widening of Lucullus Road.	road reserve has been established. Nevertheless, the existing "Mellish" Road from Lichtenberg, will perform this access function to the airport until such time.
	3. IMPACT ON THE SURROUNDING BUILT FABRIC During the meeting on 15 April 2025, the JCF referred to the "Face of the Winelands" along the N1 which will be destroyed completely by industrial development on both sides of the N1 between Paarl and Joostenbergvlakte. In this way, the R304 to Malmesbury will also be industrially developed and will no longer be a scenic route. The result of agricultural land being converted into industrial developments means less food in the Western Cape's food basket, soil pollution, air pollution and water pollution as is already being experienced in Bloekombos and Wallacedene. It must be borne in mind that Joostenbergvlakte is located on a primary aquifer and that water is becoming scarcer each year. The contamination of the aquifer will result in livestock, residents and crops in Joostenbergvlakte not getting enough and/or quality water.	Response from town planner: It is not clear if the VCF is referring to other industrial developments in the area or to CWA. There is a comprehensive set of specialist reports in the application that deals with the agricultural and water related issues. The CWA land abutting the R304 is not being developed and will not form part of the rezoning application. The CWA application will not change the "face of the Winelands" as perceived from the R304. Also see Visual Impact Assessment, App 14.

			
417	Dave Rudolph - ECI Environmental Consultants International	Email dated 19 May 2025: I trust that you are well. We have been appointed to assist the PSI with commenting on the draft EIR. I have reviewed the document and will be submitting comments. I have been traveling outside of the country for work over the past two weeks and have not been able to finalise my comments. Please can I request that the comments be submitted by no later than 23 May 2025, as I return on the 22nd of May. I trust that this is in order.	Email response provided 19 May 2025: The commenting period was from 19 March up to and inclusive of 13 May, therefor the commenting period has closed. We are working to very stringent deadlines at the moment to submit the final report to DEA&DP. Regardless, I can grant you extension until 10am on Friday 23 May for submission of comments.
		Email dated 23 May 2025:	Email response provided 23 May 2025:

	I trust that you are well. Please find our comment, on behalf of PSI. Once again we thank you for your indulgence to submit comments by 10h00 on 23 May 2025. Please will you advise as to when the final is submitted and make a copy available for review.	Thank you for the comments received
	Letter received via email dated 23 May 2025: COMMENTS WITH RESPECT TO THE PROPOSED EXPANSION OF THE CAPE WINELANDS AIRPORT (CWA) DRAFT ENVIRONMENTAL IMPACT ASSESSMENT Please find attached the comments on the draft Environmental Impact Report (EIR) for the Cape Winelands Airport Draft Environmental Impact Assessment dated March 2025. We appreciate the fact that an extension of time has been granted to submit comments on the draft EIR by no later than 10h00 on 23 May 2025.	
	A. Introduction 3. Environmental Consultants International (ECI) has been appointed by the Paardeberg Sustainable Initiative (PSI) to undertake a review of the Scoping and Environmental Impact Assessment process as promulgated in terms of the Environmental Impact Assessment regulation.	Noted.
	2. By way of background PSI was conceived in 2001, in recognition of threats to the biodiversity and natural resources of the Paardeberg, a privately-owned mountain in the Western Cape, South Africa.	Noted
	3. PSI is a duly registered non-profit company with registration number 2011/127140/08 and governed by a board of directors	Noted
	4. The vision of the PSI is – • to create a successful model of sustainable development, • promoted by profitable enterprises and non-profitable projects, • co-operating in partnerships that oversee responsible management of natural resources and biodiversity,	Noted

		• within an economic framework that obviates the plague of poverty and social decay, while upholding the law and supportive of good governance	
		B. Comments 6. PSI is a well-known and established entity, within the vicinity of the proposed CWA.	EAP response: The Paardeberg Sustainability Initiative is a registered IAP for the proposed project. The Paardeberg area lies approximately 16km northeast from CWA.
		7. Unfortunately, the PSI, as an active role player in the community surrounding the proposed CWA were not identified as a potential stakeholder and therefore an interested and affected party (I&AP) during the Scoping Stage of the environmental application process.	EAP response: The EIA process was widely publicised over the last two years PSI registered as an IAP following news articles about the proposed project in February 2025. PSI was notified as part of the second EIAR PPP period of the commenting period. A presentation regarding the proposed project was held at the Farmers Day on 20 March 2025 at the invitation of PSI. PSI also attended the open day on 15 April 2025.
		8. As a result of not being identified, and or notified of the process, PSI did not have an opportunity to engage environmental assessment practitioners, from the onset of the process, and only joined the process at the EIA stage.	EAP response: See response above. The onus was on PSI to have registered earlier, its interest area is located far from the site, and not a registered conservation body referred to use by any Organ of State.
		9. The title of the application “Proposed expansion of the cape winelands airport” is misleading, in that it leads the reader to believe that the airport is already in existence. Whereas the current facility is in fact a Category 1 Aerodrome (License number 0820) from the Civil Aviation Authority. Current aviation activity at the airport consists of flight training, recreational flying, charter, and other unscheduled General Aviation (GA) activity with all flights operating under “visual flight rules”.	EAP response: The proposed project is for the expansion of the existing Cape Winelands Airport. It is not the establishment of a new airport at a new site.
		10. Page 54 of the Draft EIR states “The proposed development and expansion of Cape Winelands Airport will see it upgraded from a general flying airfield (my underlining) into a commercial airport capable of facilitating long-haul, wide-body flights by airlines and unscheduled operators from across the world”.	EAP response: The quote from the amended draft EIAR is noted. Note it is on page 56 of the amended draft EIAR and not page 54.
		11. The property description according to the application is that the “proposed development will extend across five additional surrounding cadastrals, combining seven cadastrals of 885ha in	EAP response: All land parcels listed are affected by the proposed development, some to a lesser extent. All listed land parcels will be owned by

		total size based on the title deed areas. The area of study, however, will comprise 470ha of the 885ha. The additional surrounding cadastrals making up the area of study were secured through sale or by Power of Attorney. Portion 23 of Farm 724, RE of Farm 724, Portion 10 of Farm 724, Portion 4 of Farm 474, RE of Farm 474, Portion 7 of Farm 942". It is unclear from the Draft EIR who owns each of these portions of property. Furthermore, it is also unclear what the future ownership of the above portions of land will be, in particular those portions which are not affected by the proposed infrastructure (see figure 4) and that will therefore remain as agriculture for the foreseeable future.	the applicant. The areas East of the proposed airside currently zoned as agriculture will remain as agriculture zoning with associated farming activities.
		12. The above point is important, as is correctly stated in the "Legislation applicable to the proposed project", the Conservation of Agricultural Resources Act 43 of 1983 (CARA) places an obligation on the current and future landowners to promote the conservation of the soil, the water sources, and the vegetation, and to combat weeds and invader plants.	EAP response: Page 84 of the amended draft EIAR states The proposed expansion project entails rezoning of agricultural land for use in aviation, which will require input from Western Cape Department of Agriculture: Land Use Planning. The proposed project is consistent with the CARA by including Western Cape DoA: Land Use Planning as I&AP in the NEMA process, the rehabilitation and maintenance of the agricultural precinct and for the subsequent authorisation required for the partial rezoning of agricultural land. DoA Land Use Planning is a registered IAP and has given comment on the proposed project. Their comment states: The Western Cape DoA has no objection to the proposed project. The remaining agricultural area will be managed in relation to CARA objectives
		13. Further to this obligation there is the duty imposed on all prospective landowners to ensure that, when purchasing a portion of land, that they take responsibility for the past actions on the property, and therefore acquire it "voetstoots", that is with as it stands. The obligations of CARA are therefore carried from the one owner to the next.	EAP response: The comment is noted.
		14. As with CARA, the National Water Act (Act 36 of 1998) (NWA) also provides the legal basis for water management in South Africa and must ensure ecological integrity, stimulate economic growth,	EAP response: The comment is noted.

		and promote social equity when managing and using water. It is based on Integrated Water Resource Management (IWRM), which includes water quality, water quantity, pollution prevention, resource protection and protection and promotion of aquatic ecosystem quality (aquatic biota and in-stream and riparian habitat).	
		15. The application makes use of the “offset” approach from the onset of the environmental application, in all likelihood, as a result of the strategic nature of the project. In terms of the National Biodiversity Offset Guidelines, (January 2023) “.....negative impacts of certain activities on biodiversity must be avoided, and where they cannot altogether be avoided, are minimised, and remedied through rehabilitation and should there still be a significant remaining impact, offsetting. Biodiversity offsetting has been identified as one way in which biodiversity loss can be slowed down. Biodiversity offsetting is one of the best means of remedying such disturbance or loss, but only after the other steps in the mitigation hierarchy (i.e. avoidance, minimisation and rehabilitation) had been considered”.	EAP response: The proposed project includes Wetland and Terrestrial offset, both of which were developed post the implementation of the mitigation hierarchy.
		16. The approach being followed by the Applicant, to move directly towards offsetting the impact, is understood, simply on the basis of the strategic nature of the project, and the lack of other viable alternatives. However, the selection of the freshwater offset site is not understood, especially in as far as the riparian offset site on the property which currently forms part of the application. The “Freshwater Offset Report (September 2024 and amended March 2024)” has not been attached as an appendices for review purposes. The correct approach in this instance would be to exclude the portion of land, which has been proposed as part of the offset site from the development area, due to its sensitivity. This is therefore a no-go area and not an offset area.	EAP response: The Terrestrial and Wetland offset development followed on the implementation of the mitigation hierarchy. The Freshwater offset report was attached to the EMPr as Annexure 7 for review. The offset area is excluded from the development area and also excluded from future farming areas.
		17. In the absence of the “Freshwater Offset Report” it is difficult to understand how the owner of the property, who has an obligation to ensure that the sensitive area identified on site, which has been degraded due to past practices, be rehabilitated in terms of	EAP response: The Freshwater offset report was attached to the EMPr as Annexure 7 for review. The freshwater offset area was determined following

		the provisions of CARA in the normal course of events can now defer these obligations and transfer them to being a offset site.	procedure and deemed suitable in this case. Organs of State also support the offset result.
		18. Portions, RE of Farm 474, Portion 7 of Farm 942 are excluded from the development area. There is a probability that these portions of land can be sub-divided from the development and sold for development purposes at a later stage, when the property around the proposed airport becomes scares and “vacant land” is at a premium.	EAP response: The larger parts of these agricultural portions are excluded and no subdivision is proposed. The sections that are included in the development area requires rezoning. PSI speculates what might happen in the future, but if such a situation arise the required administrative procedures will be followed.
		19. In terms of 5.1.5 of the National Biodiversity Offset Guidelines, “Ideally, the biodiversity offset site should be secured by the declaration of the site as a protected area in terms of the National Environmental Management: Protected Areas Act, 2003, or by the registration of a conservation servitude in respect of such land if the declaration of a protected area is not possible or appropriate under the circumstances”. In these circumstances the proposed off-set site does not fulfil this criteria.	EAP response: The intent as per specialist report was the protection of the offset site into perpetuity. We can confirm that the wetland offset area will be a registered conservation servitude to be registered after the EA is issued. This aspect is now included as a condition of approval. Section 4.2 PRE-CONSTRUCTION PHASE (of the EMPr): F. Protection of sensitive features (Search & Rescue): <i>“Prior to commencement activities taking place, involving the destruction of sensitive wetland or botanical features on site, the applicant must conclude the offset implementation agreements with a suitable person or organisation that secures in perpetuity, through suitable legal protection mechanisms, the area recommended for the Biodiversity and Freshwater Offsets.”</i> Section 4.4 OPERATIONAL PHASE: GOAL 3: SAFEGUARD FRESHWATER ECOLOGICAL FEATURES states that: <i>The Wetland Offset Study and Implementation Plan (Annexure 7) needs to be implemented.</i> <i>Adhere to the Maintenance Management Plan (Annexure 16) for all maintenance aspects undertaken within the vicinity of Freshwater Ecosystems.</i> Response from FEN:

			It is agreed that the offset wetlands (particularly the remaining seep wetland and portion of the CVB wetland and the immediate surrounding area) must be formally protected through an appropriate legislative vehicle: Protected Areas Act (NEMPAA) would provide long-term legal protection, ensuring that the ecological integrity of the site is maintained in perpetuity. This formal designation would secure the offset areas against future land-use changes and establish a robust framework for their management and protection in line with the National Biodiversity Offset Guideline (2023). However, proclaiming the wetland systems as a nature reserve under NEMPAA presents logistical challenges, given their linear and fragmented nature. Their physical configuration and alignment with broader ecological corridors make the approach of registering a conservation servitude over these portions a more practical and context-appropriate alternative. A conservation servitude, registered against the title deed of the land(s), provides a legally binding mechanism that restricts incompatible land uses while allowing for active ecological management and long-term monitoring. Conservation servitudes meet the requirements of biodiversity offsets by securing ecological and functional integrity while accommodating the landscape-specific constraints. This approach ensures that the wetland systems remain protected while allowing for adaptive management interventions, fulfilling both conservation and offset objectives in a legally enforceable manner. It is recommended that the proposed offset area registered with a conservation servitude to ensure future protection of the offset site in perpetuity (at least 30 years). This is agreed upon and signed by the proponent (refer to the signed draft Memorandum of Understanding in Appendix J of the offset report). The only exception is the area where the two proposed water crossings (i.e. roads) will be constructed over the offset area. As the exact location of the roads have not been determined, the area (in hectares) to be constructed were incorporated into the wetland offset calculation and target offset area. As such, these areas were excluded from the target offset wetland extent. These roads will however still have to follow the appropriate environmental authorisation processes prior to being constructed.

		20. Pg 516 of the Draft EIR states that “The applicant will have a large environmental management responsibility around the airport site – including almost all the kinds of interventions that need to be carried out on the offset site (Fencing and security, controlled burns, invasive plant control, erosion and rehabilitation etc)”. The applicant, as the landowner, or if the applicant is not the landowner, the landowner itself is obliged in term of CARA and the NWA to protect the riparian area, despite the airport being approved or not.	EAP response: The wetland rehabilitation and offset areas are currently used for agriculture and are not new areas to be ploughed. Response from FEN: The offset goes beyond the requirements of the Duty of Care of a landowner and aims for active rehabilitation and restoration. In this way there is a gain in functionality and conservation value making the initiative a valid offset for the impacts associated with the CWA.
		21. Regarding the greater offset site, being the proposed “Hercules Pilaar” site, the Draft EIR states on page 516 that “A binding Letter of Intent commitment has been concluded between the applicant and the owner of Hercules Pilaar covering a long-term lease agreement/conservation (my underlining) servitude with an accompanying management agreement”. This agreement gives no guarantee that the long-term lease agreement will comply with the provisions of the National Biodiversity Offset Guidelines, where the protection of the area is in perpetuity.	Specialist response: The Letter of Intent concluded between the landowner and the applicant is binding, and is satisfactory to the offset specialist. The applicant has no sight of these specifics, so cannot make this assertion. It is inappropriate to circulate these instruments for public knowledge as the contents can be commercially sensitive, and premature exposure could frustrate offset implementation, or allow commencement to be held ransom. The agreement will be submitted with final documentation to the competent authority, who is empowered to assess whether it is sufficient in terms of the guideline.
		22. The EAP states on page 516 of the draft EIR “As an extra means of security, a PBO (the Endangered Wildlife Trust) has agreed to play the role of site manager in the instance that the applicant fails or is unable to meet its offset obligations.”. The Endangered Wildlife Trust have been contacted in order to test the veracity of the agreement and commitment and have established that there is no agreement in place.	EAP response: The Biodiversity Offset report (page 15) states: <i>“As an extra means of security, a PBO (the Endangered Wildlife Trust) has agreed to play the role of site manager in the instance that the applicant fails or is unable to meet its offset obligations”</i> This statement remains valid as it is based on year long negotiations and development of the offset with the full participation of EWT, the landowner,

			CapeNature and CoCT. The EAP is unsure who the IAP called at EWT to make this enquiry. Specialist response: The I&AP is correct. Discussions were held, but agreement was never reached due to a change of implementation modality (i.e. the applicant having reason and motive to take on own management of the offset site as it is adjacent to their own land to be managed for environmental purposes). This wording needs to be corrected. The EWT was nominated to receive the penalty amount for non-compliance (see below) to deploy into biodiversity outcomes in the priority sites in the local node of the city's bionet). This has been confirmed in an agreement between the EWT and the applicant or CEA. Refer to letter from EWT below:

		23. Additional Concerns a) The Environmental Impact Assessment Regulations make provisions for all documentation to be subjected to, as a minimum, a 30-day review period as part of the Public Participation Process. It is therefore perplexing as to why the Environmental Assessment Practitioner (EAP) has determined that it is acceptable to provide a “sanitised comments and response report” as part of the review process. It begs the question as to what other information has been sanitised or withheld from the Public Participation Process.	 Private Bag X08 Wierda Park 0149 10 June 2025 To Whom It May Concern, Commitment regarding penalty endowment and biodiversity offset management Further to the recent correspondence and in response to CapeNature's recommendation, the Endangered Wildlife Trust (EWT) confirms its willingness to receive the proposed endowment as part of the penalty condition. We confirm the following commitments: • Receipt and Holding of Funds - EWT is willing to receive endowment into a dedicated, floating, and interest-bearing account. • Deployment of Funds - The funds will be deployed through EWT's governance and financial structures, and used in the following order of priority: • Implementation of the management plan for the designated offset site; • Additional activities proposed by the City of Cape Town and supported by CapeNature for the site; • Other activities that address biodiversity threats or improve ecological outcomes on adjacent or nearby sites within the City's BioNet, which are secured or in the process of being secured for long-term conservation. EWT will report to the competent environmental authority annually, or as otherwise required, via the relevant project line in our audited financial statements detailing how the funds have been allocated and spent. We support CapeNature's recommendation that management of the offset site must be prioritised above any other use of the penalty condition. Please do not hesitate to reach out should further clarification be required. Yours sincerely,  Mr. Kishaylin Chetty Executive: Head of Sustainability Endangered Wildlife Trust
			EAP response: We only sanitised the components as required by the POPI Act. All other facts and comments are still shared.

		b) The Biodiversity Offset Report, on page 16, makes provision for R 515 060.00 for the first year to the management interventions of the candidate site (assuming Hercules Pilaar). There is no guarantee offered that this amount will be available and there are no provisions calculated for the years after the first year. The only reference to the years after the first year is “each yr differs”.	Specialist response: The applicant has made commitments to achieve certain outcomes in terms of the offset. A detailed costing of site management, based on an indicative management plan - consulted with the commenting authorities, has been compiled. However, it is non-sensical to focus on the future years costing, but rather the outcomes that need to be achieved (it is in the applicant discretion on whether to share the costing framework with I&APs). How the applicant achieves the outcome and at what cost is up to them (and will be codified in the EMPr). The proposed condition of authorisation covers a specific amount in addition to any administrative penalty and directive for rehabilitation etc. This specific amount is derived from the Net Present Value of all the offset site management requirements over the 30-yr liability period (R8m). This is a substantial financial and legal incentive for the applicant to comply with the offset condition of authorisation. If the competent authority requires a performance guarantee for this offset financial provision, they can do so, but the opinion of the specialist is that this is not required given the importance of offset outcome achievement to the applicant. EAP response: This information was already included in the EMPr. GOAL 2B: SAFEGUARD BOTANICAL FEATURES (OFF-SITE). Refer to Page 245-248 of the EMPr.
		c) The offset provision of R 515 060.00 has not been taken into account in the socio-economic impact assessment and was only confirmed at the public Open Day of 15 April 2025. As the offset is a central aspect to the environmental application it is of concern that it has not been considered and begs the question of the seriousness of the offset agreement or if it is merely lip service from the Applicant.	EAP response: The offset agreement is in place with the landowner with financial provision and management objectives incorporated into the proposed application. The Letter of Intent concluded between the landowner and the applicant is binding, and is satisfactory to the offset specialist. Specialist response: The consideration of the offset provision falls outside the scope of the socio-economic IA.

		d) No financial provision has been made for the “Freshwater offset”.	EAP response: the Wetland offset report attached as Annexure 7 to the EMPr contains the required financial provision and a MOU.
		e) The current routing of the of the flights will have a negative impact on the Paardeberg and Kasteelberg. In order to mitigate this impact on the ‘sense of place’ the flight paths should be directed north of Riebeek Kasteel. By redirecting the flight path to the north of Riebeek Kasteel the negative impact on a number of important wine farms, specifically Sadie Family Wines, AA Badenhorst, Dragonridge, Lammershoek, will be reduced.	CWA response: Thank you for your comment. While we acknowledge the concerns raised regarding the potential impact of flight paths on the ‘sense of place’ in the Paardeberg and Kasteelberg areas, it is important to clarify several key points: 1. Geographic Context and Routing Alignment: Both Paardeberg and Kasteelberg are located to the northeast of Cape Winelands Airport (CWA). The planned instrument arrival and departure routes on the northern side of the airport are anticipated to route well to the west of these landmarks. As such, the proposed routing does not pass directly over either Paardeberg or Kasteelberg, nor does it significantly affect their surrounding environments. 2. Compliance with ICAO Standards: All planned instrument flight paths will be designed in full compliance with ICAO Procedures for Air Navigation Services — Aircraft Operations (PANS-OPS) and other applicable ICAO guidelines. These procedures prioritize safety, efficiency, and environmental impact mitigation, and are developed through a rigorous, data-driven process involving terrain analysis, airspace structure, and operational safety considerations. 3. Noise Impact and Legal Compliance: The noise footprint study conducted as part of the environmental assessment clearly demonstrates that both Paardeberg and Kasteelberg lie well outside the legally permissible day and night noise contours established for CWA operations. These contours are based on internationally accepted modelling standards and reflect the maximum permissible noise impact zones. Accordingly, the areas in question are not expected to experience any material noise disturbance from airport operations.

			In conclusion, the current and planned flight paths represent a balanced approach that prioritizes aviation safety and environmental responsibility, while ensuring compliance with national and international regulations. The evidence, including geographic alignment, flight path design standards, and noise footprint analysis, does not support the assertion that CWA will have a negative impact on the wine farms mentioned.
		f) There is a threat emanating from bird strikes, as has been highlighted in the specialist report. The dams in the area, in particular those related the poultry industry have high levels of nutrients, which attract the birds. An example of this is the County Fair Waste Water dams. Nutrients in these dams could be extracted from the system before entering the dams and used in a bio-digestion process. This bio-digestion process, which has been considered in the application as a mitigation measure, now appears to have been abandoned. The opportunity for the airport to bring alternative energy sources and research projects should be incorporated as part of the sustainability and social responsibility component of the proposed airport, should the airport be approved. The utilization of the nutrients will have a significant positive impact on the area and should be encouraged.	EAP response: A bird strike specialist was involved in the EIA process. A Wildlife Hazard Management Plan (including Birds) will be developed as per the requirement for all airports. The proposed biodigester still forms part of the project scope and has not been abandoned. The use of chicken manure as a Technology Alternative has been removed, based on biosecurity concerns raised by IAPs.
		g) Further to this and still in-line with the corporate social responsibility, a filtration/ artificial wetland pilot project should be considered as part of the de-nutrition of the containment dams.	EAP response: the proposal is appreciated, but the Applicant has no management rights over the County Fair wastewater dams referred to.
		h) The socio-economic assessment does not assess the impact on of the proposed new airport on the natural resources of the area. This point was raised and discussed at the Open Day, of 15 April 2025, and it was verbally confirmed that no resource economic impact assessment was undertaken in an area which is rich in natural resources, such as the Paardeberg. This is considered to be an oversight and a flaw in the assessment.	EAP response: the biophysical impacts associated with the proposed project have been considered in the various specialist reports (Faunal, Avifaunal, Botanical, Freshwater). Mitigation (inclusive of offsets) have been developed and included in the proposed project. The EAP is of the opinion that no resource economic IA is required. PSI area is 16 km from the airport and the “rich” natural resources are not affected.

		C. Conclusion a) The Public Participation Process appears to be flawed in that the key stakeholders such as PSI, were not identified at the onset of the process. b) The EAP has determined that it is acceptable to only provide a sanitised Comments and Response Report. This determination of the EAP allows for the EAP to not disclose all the comments, as they were received. c) The off-set plan makes reference to an agreement with EWT, which according to the EWT (verbal communication) is not inexistence. d) Consideration should be given to further corporate socio-economic projects which will off-set the long-term impact of the proposed airport, on the receiving environment, beyond the biophysical offsets proposed.	EAP response: a thorough and legally compliant PPP was conducted to date. The identification of an IAP approximately 16km from the proposed project sight is not a flaw and neither is PSI considered a key stakeholder at this stage. The EIA was widely publicised for over 2 years now and it was PSI's responsibility to have registered earlier in the process. PSI is not a registered conservation body, neither was it highlighted as a potential I&AP by any Organ of State. EAP response: all 3 C&R reports provided to IAPs are a true reflection of comments received and have been sanitised according to POPIA requirements. EAP response: The Biodiversity Offset report (page 15) states: <i>"As an extra means of security, a PBO (the Endangered Wildlife Trust) has agreed to play the role of site manager in the instance that the applicant fails or is unable to meet its offset obligations"</i> This statement remains valid as it is based on year long negotiations and development of the offset with the full participation of EWT, the landowner, CapeNature and CoCT. The EAP is unsure who the IAP called at EWT to make this enquiry. Refer letter from EWT as above. EAP response: long term corporate socio-economic projects are outside of the scope of the EIA process and will be developed in due course by the Applicant should the EA be granted.

		e) The socio-economic assessment should be updated to include a resource economic assessment as well as details about the provisional sum set aside for management interventions in the long-term.	EAP response: the inclusion of resource economic considerations falls outside the scope of the Socio-economic IA and will not be included. See additional response to this comment above.
		We look forward to your response and once again appreciate your indulgence in agreeing to the late submission of the comments.	-
418	Kgomoitso Mohlodini - National Department of Water and Sanitation	Email dated 22 May 2025: f) Hope you are well Kindly find attached the comments on the above-mentioned proposed activity NB my apologies for the late response	Email response provided 22 May 2025: Thank you for the comments provided.
		Letter received via email dated 22 May 2025: AMENDED DRAFT EIAR FOR THE PROPOSED EXPANSION OF THE CAPE WINELANDS AIRPORT. Reference is made to the above mentioned document with DEA&DP reference number 16/3/3/2/A5/20/2046/24.This Department has perused the submitted application and has the following comments:	-
		This Department notes the submitted Water use application (ref number WU33620) for the triggered section 21((a), (b), (c) ,(i), (e), and (g)) water uses as indicated in the report. You are hereby advised to follow the application process	EAP response: Noted. The WULA is in process with DWS.
		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.	EAP response: Noted
		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.	EAP response: Noted
		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.	EAP response: Noted

		Please do not hesitate to contact the above office should there be any queries.	EAP response: Noted
419	Sean Bradshaw - ACSA	Email from ACSA to DEADP dated 9 June 2025: Airports Company South Africa wishes to formally object to the potential granting of an Environmental Authorisation to Cape Winelands Aero (Pty) Ltd. in respect of an environmental authorisation application (DEA&DP ref. no. 16/3/3/2/A5/20/2046/24) to expand the Cape Winelands Airport. Please find attached a detailed motivation supporting our objection. If you can kindly confirm receipt	The EAP was copied in the email to DEA&DP.
		Objection letter received via email dated 9 June 2025: OBJECTION BY AIRPORTS COMPANY SOUTH AFRICA SOC LTD ("ACSA") TO THE POTENTIAL GRANT OF AN ENVIRONMENTAL AUTHORISATION TO CAPE WINELANDS AERO (PTY) LTD ("APPLICANT") IN RESPECT OF AN ENVIRONMENTAL AUTHORISATION APPLICATION (DEA&DP REFERENCE NO. 161313121A512012046124) TO EXPAND THE CAPE WINELANDS AIRPORT ("OBJECTION") - INTRODUCTION AND BACKGROUND 1.1. ACSA is a state-owned company with limited liability, registered as such in accordance with the laws of the Republic of South Africa, with registration number 1993/004149/30. 1.2. ACSA operates the Cape Town International Airport ("CTIA"), situated within the Western Cape Province, and is the registered holder of, inter alia, an amended environmental authorisation issued by the Department of Forestry, Fisheries and the Environment ("DFFE") under reference number 14/12/16/3/3/2/446 for the proposed runway re-alignment associated infrastructure at the CTIA	EAP response: The legal status of ACSA is noted and the EA 14/12/16/3/3/2/446. CWA response: <u>CWA acknowledges ACSA's Legal Status</u> ACSA is a state owned entity, established under the Airports Company Act, 44 of 1993 ("ACA"). ACSA is an organ of state as defined by the Constitution of the Republic of South Africa Act, 1996 ("Constitution"), in that it is "[a] functionary or institution.... exercising a public power or performing a public function in terms of any legislation" (section 239 of the Constitution). ACSA is a state-owned entity charged with implementing the ASA. <u>CWA acknowledges ACSA's Powers and Obligations</u> ACSA's powers are defined in the ACA, these include the obligation to own and manage defined "Company Airports" (section 6(6) of the ACA) of which the Cape Town International Airport ("CTIA") is one. Its powers are strictly related to the ownership and operation of company airports (sections 13 and 14 of the ACA). While it clearly has an interest in the safety of aircraft that land at

			and take off from, CTIA, it has no jurisdiction over those issues; those are the remit of the Civil Aviation Authority ("CAA"). Also stipulated in the ACA is ACSA's obligation "to conduct its business in such a manner as to ensure that the company does not engage in any restrictive practice as defined in section 1 of the Maintenance and Promotion of Competition Act, 96 of 1979" (section 5(2)(d)). Although it is acknowledged that this provision is not yet in force, it gives a clear indication of the legislature's intention regarding ACSA's conduct, which intention is important in the context of this Application. As an organ of state in a constitutional democracy, ACSA is publicly accountable and must act lawfully and rationally.
		1.3. We understand that the Applicant has – 1.3.1. submitted an application for an environmental authorisation ("EA Application") to the Department of Environmental Affairs and Development Planning ("DEA&DP") under reference number 16/3/3/2/A5/20/2046/24; and 1.3.2. appointed PHS Consulting ("PHS") as the Environmental Assessment Practitioner ("EAP") in respect of the EA Application.	EAP response: The AEA for the proposed project has been submitted to DEA&DP, with the final EIAR submission still to be completed. PHS Consulting is the appointed independent EAP.
		1.4. On or about 19 March 2025, PHS, circulated electronic notification to interested and affected parties ("I&APs") requesting comments on the amended In-Process Draft Environmental Impact Assessment Report ("Draft EIA"), Water Use License Technical Report, Waste Management Plan, Maintenance Management Plan and supporting documents in respect of an EA Application for the proposed expansion of the Cape Winelands Airport ("CWA"), which shall hereinafter be referred to as the "CWA Expansion Project". The CWA Expansion Project documents, which were submitted on behalf of the Applicant, were made available on the PHS website for comment.	EAP response: The amended draft EIAR was circulated to registered IAPs from 19 March to 13 May 2025 for comment.
		1.5. On 13 May 2025, we submitted our comments in respect of the Draft EIA to PHS, which are attached hereto as Appendix "A"	EAP response: ACSA comments were received from S Bradshaw on 13 May 2025 and included in the C&R in Appendix 29D.

			[Please refer to Comment Number 412 of this Comments and Response Report]
		1.6. We understand that the EA Application is in respect of the farms 10/724, RE/724, 23/724, 7/942, RE/474, 3/474 & 4/474, approximately 10.5 kilometres northeast of Durbanville on the R312 and approximately 6 kilometres north of Joostenberg Vlake, on the R304 for the following activities: 1.6.1. listed activities under Listing Notice 1: 9, 10, 12, 13, 16, 19, 24, 25, 26, 28, 48, 56 and 61, ¹ Listing Notice 2: 1, 4, 7, 15, and 27, ² and Listing Notice 3: 1, 2, 3, 4, 12, 18 and 19; ³ 1.6.2. registration of waste management facilities with DEA&DP in terms of the National Norms and Standards under the National Environmental Management: Waste Act 59 of 2008, 1.6.3. an application for a water use licence to the Department of Water and Sanitation for water uses under section 21 (a), (b), (c), (i), (e), and (g); and 1.6.4. a request for the relevant Competent Authority to define or adopt a Maintenance Management Plan for a watercourse in terms of the National Environmental Management Act 107 of 1998 ("NEMA"), Environmental Impact Assessment Regulations, 2014 (as amended)4 ("EIA Regulations").	EAP response: The process entails application for authorisation/registration to competent authorities, to undertake the following activities: • EIA activities to DEA&DP: Development Management: LN 1: 9, 10, 12, 13, 16, 19, 24, 25, 26, 28, 48, 56, 61; LN 2: 1, 4, 7, 15, 27; and LN 3: 1, 2, 3, 4, 12, 18, 19. • Registration of Waste Management Facilities with DEA&DP in adherence to the National Norms & Standards in terms of the National Environmental Management Waste Act, 59 of 2008. • Water use licence activities to DWS: Section 21 (a); (b); (c & i); (e); & (g). An application for a Water Use Licence has been submitted to DWS provincial. • Request for the relevant Competent Authority to define or adopt a Maintenance Management Plan for a watercourse in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), Environmental Impact Assessment Regulations, 2014 (as amended) will also be included.
		1.7. Over the course of the years, we have extensively engaged with the EAP, particularly through the submission of our comments on 8 December 2023, 26 August 2024 and 12 December 2024, respectively, which raised material concerns regarding airspace, operational sustainability, and need and desirability should the proposed CWA Expansion Project proceed.	EAP response: All comments received from ACSA during the course of the Scoping and EIA phases, were recorded and responded to in the Comments and responses report.
		1.8. We hereby submit our Objection in terms of Regulation 40(1) of the EIA Regulations read with section 240 of the NEMA in respect of the EA Application.	EAP response: All registered and potential IAPs, including ACSA, were provided with an opportunity to comment on the documentation, with comments received captured and responded to in a C&R and this C&R also provided to IAPs for comment.

		1.9. With reference to the information provided to date in respect of the EA application, and for reasons set out in this Objection, it is evident that— 1.9.1. the Draft EIA does not sufficiently demonstrate the need and desirability for the CWA Expansion Project; 1.9.2. the CWA Expansion Project does not constitute a sustainable development; 1.9.3. the CWA Expansion Project creates major socio-economic problems that endanger the well-established aviation system operated by ACSA from CTIA; 1.9.4. given that the airspace in the Western Cape, particularly Cape Town, is a limited and shared resource, the CWA Expansion Project poses a concern regarding potential impact on airspace; 1.9.5. should ACSA experience a fuel shortage, the CWA Expansion Project will affect CTIA's fuel access, availability and sufficiency; 1.9.6. the Draft EIA has inadequate and incomplete information regarding CTIA's current and planned infrastructure; and 1.9.7. the potential grant of the EA Application ("EA Grant Decision") would constitute unfair and unreasonable administrative action under the Promotion of Administrative Justice Act 3 of 2000 ("PAJA").	EAP response: The points under 1.9.1 to 1.9.7 are individually addressed below in the respective sections.
		1.10. ACSA, therefore, submits this Objection against the EA Grant Decision on the grounds set out below.	EAP response: No EA has been granted for the proposed project. It is in the EIA phase at present with final submission still to be made to DEA&DP. The objection received is processed as a late comment and included in the C&R with responses.
		2. FIRST GROUND OF OBJECTION: THE PROPOSED CWA EXPANSION PROJECT DOES NOT ADEQUATELY DEMONSTRATE A NEED AND DESIRABILITY	-
		2.1. The Draft EIA does not adequately demonstrate the need and desirability of the CWA Expansion Project as required by the EIA Regulations, which	EAP response:

		require "a motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location". The Draft EIA is, in our view, unsubstantiated and speculative.	The Need and Desirability of the proposed project is assessed in Section 5 of the amended draft EIAR. The content complies with the requirements of the DEA&DP Guideline and includes additional information on sustainability parameters. The EIA Regulations specifically requires the consideration of how the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity, and need and desirability relates to all of these considerations. To determine if the proposed activity is the best option when considering "need and desirability", it must be informed by the sum of all the impacts considered holistically. In terms of location, please note that the motivation was provided in the amended draft EIAR. There are no location alternatives for this proposed project- it is for the expansion of an existing airport at an existing site with existing impacts.
		2.2. Part 1: The proposed CWA Expansion Project fails to demonstrate adequate necessity or usefulness as required under section 240 of NEMA. Part 2: The current and future capacity of the commercial international airport in the Western Cape, being the CTIA, provides sufficient facilities to meet all projected passenger demand until 2050. ACSA has approval for a CTIA runway realignment alongside terminal and apron expansion plans, which will more than cater for growth over the next 15 years. The established infrastructure enables regional tourism growth and business expansion without needing a second commercial or diversion airport.	Part 1: EAP response: Section 240 of NEMA refers to Criteria to be taken into account by competent authorities when considering applications. And further states that <i>the CA must take into account all relevant factors, which may include—</i> <i>(i) any pollution, environmental impacts or environmental degradation likely to be caused if the application is approved or refused;</i> <i>measures that may be taken—</i> <i>(ii) (aa) to protect the environment from harm as a result of the activity which is the subject of the application; and</i> <i>(bb) to prevent, control, abate or mitigate any pollution, substantially detrimental environmental impacts or environmental degradation;</i> <u>Response:</u> All potential impacts of the proposed project have been assessed and mitigation developed in order for the CA to be in a position to make a decision.

			(iii) <i>the ability of the applicant to implement mitigation measures and to comply with any conditions subject to which the application may be granted;</i> <u>Response:</u> The Applicant is technically and financially competent and able to implement the mitigation measures and any conditions of authorisation. (iv) <i>where appropriate, any feasible and reasonable alternatives to the activity which is the subject of the application and any feasible and reasonable modifications or changes to the activity that may minimise harm to the environment;</i> <u>Response:</u> Feasible and reasonable alternatives were developed within the Scoping and EIA Phases based on technical, specialist, CWA and IAP input. (v) <i>any information and maps compiled in terms of section 24(3), including any prescribed environmental management frameworks, to the extent that such information, maps and frameworks are relevant to the application;</i> (vi) <i>information contained in the application form, reports, comments, representations and other documents submitted in terms of this Act to the Minister, Minister responsible for mineral resources, MEC or competent authority in connection with the application;</i> (vii) <i>any comments received from organs of state that have jurisdiction over any aspect of the activity which is the subject of the application; and</i> (viii) <i>any guidelines, departmental policies, and environmental management instruments than have been adopted in the prescribed manner by the Minister or MEC, with the concurrence of the Minister, and any other information in the possession of the CA that are relevant to the application.</i> <u>Response:</u> The amended draft EIAR complies to the above in terms of contents and process. (c) <i>take into account the comments of any organ of state charged with the administration of any law which relates to the activity in question.</i> <u>Response:</u> All comments received from organs of state are includes with responses in the C&R for consideration by the CA. Consultation in terms of Section 24O (2) and (3) is done by the EAP on behalf of the CA.

			Part 2: CWA response: <u>ACSA's approach to market protection to secure growth</u> ACSA's prevailing posture appears to prioritise market protection as a mechanism for securing the projected growth into the Cape Town region for the next 40-50 years from now in line with CTIA's airport master plan. ACSA's main ground of Objection is that the ADEIR fails to demonstrate the need and desirability of the expansion of the CWA, which requirement is mandatory for the granting of the EA. Its primary basis for this argument is that the CTIA provides sufficient facilities to meet all projected passenger demand until 2050. That is, with respect, the same as saying that one should never build a new shopping centre because the existing one can meet the demands of customers for the foreseeable future. While it is acknowledged that ACSA has a duty, like any other company, to ensure its own sustainability, it cannot rely on its historical monopoly of the provision of aviation services in the Western Cape to insist on the right to do that in future. Put differently, it cannot argue that it is entitled to all of the growth in the aviation sector in the Western Cape simply because it has always done so before. It is respectfully submitted that the need and desirability of the Project is fully assessed in Section 5 of the ADEIAR. The content complies with the requirements of NEMA, the EIA Regulations and the applicable DEA&DP Guidelines. The EIA Regulations specifically require the consideration of how the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed activity, and need and desirability relate to all of these considerations. DEA&DP must decide if, when considering need and desirability, and taking into account the sum of all the impacts considered holistically, authorising the expansion of the CWA is justified. <u>ACSA's view of growth and beneficiaries of scheduled commercial traffic (up to 2050)</u>

			CTIA currently processes 10 million passengers per annum (MPPA). It is our understanding that ACSA conducted an independent air traffic forecast for CTIA and ACSA confirmed that their air traffic forecast for scheduled commercial annual passenger volumes for 2050 is 23,6 MPPA into the Cape Town region, where CTIA is the sole beneficiary of this growth. This is in keeping with the independent traffic forecast conducted for CWA, which indicates that an aggregate commercial passenger traffic to the Cape Town region is expected to increase to 22,6 MPPA by 2050, where CWA is the beneficiary of 5,2 MPPA of that growth. Both forecasts indicate growth into the region, highlighting the prospects of unlocking new tourism opportunities, the presence of underlying market demand and demonstrating that there is rising demand. ACSA's point of contention is that ACSA should be the sole beneficiary of this growth. CWA disagrees with this position. <u>ACSA's view of growth and beneficiaries of scheduled commercial traffic (2050+)</u> During the In-Process Public Participation Process (PPP), ACSA stated that <i>"The CTIA ultimate masterplan includes the development of a second parallel runway and associated infrastructure. CTIA can thus ultimately develop to 45 mppa. Therefore, using capacity and demand as a reasoning to justify the need and desirability of the proposed CWA is factually incorrect."</i> CWA does not agree with this statement. The fact that CTIA has a master plan which indicates that CTIA theoretical ultimate capacity of 45 MPPA, does not mean that new entrants into the market should be prohibited until such time as CTIA has reached its full theoretical capacity, 40-50 years from now. <u>ACSA's view on general aviation</u> During the Pre-Application Scoping Public Participation Process, ACSA stated that <i>"We support the relocation of light general aviation to CWA, but not high performance General Aviation like fixed wing, jet engine aircraft."</i>

			“Laying claim to the high performance GA market” is another example of market protection and monopolistic overreach by ACSA, noting that not all of the GA operators make use of ACSA facilities. Some are privately owned businesses, operating from privately owned/leased facilities on privately owned land. The GA market will, based on their requirements and needs, as well as the value proposition determine where they wish to operate from, be that CTIA, CWA or any other airport. This is purely a market decision, driven by market demands. Ultimately, the market dynamics - including infrastructure availability, cost considerations, service offerings, and overall value proposition - will determine whether operators choose to transition to CWA. <u>ACSA’s view on the provision of capacity</u> During the Draft EIR PPP, ACSA stated that “The developer states that <i>“Capacity cannot be the sole criterion for the assessment of a second airport”</i>. The developer also goes on to list a series of value-add propositions that 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.” ACSA continues to define CWA’s necessity solely through the lens of capacity needs, arguing that its own ability to expand negates the requirement to expand Cape Winelands Airport. Also arguing that capacity is the most important criteria for assessing the need for a second commercial airport. This perspective remains narrowly focused, lacking consideration of broader industry sustainability, regional connectivity and market evolution. It is not just about the theoretical ability to deliver capacity, it is also about the sustainability of the aviation eco system, which relies on competition too. The NADP of 2019 states that <i>“As illustrated above, ACSA operates a system of nine (9) airports (6 international airports and 3 domestic airports). ACSA airports which are not financially sustainable, are cross-subsidized within the ACSA network to ensure fiscal responsibility and that safety, security and environmental standards are maintained.”</i> It can be assumed that CTIA, as one of ACSA’s most profitable airports, carries the burden of these additional costs associated with cross-subsidisation due to inefficiencies within the ACSA network - costs that are passed onto the

			airlines and passengers. Private airport operators, like CWA, will be more cost competitive as it will not have to include these inefficiencies into its business model. CWA wishes to reiterate that it is not just about the theoretical ability to provide capacity, it is also about the cost of doing so. With ACSA as the monopoly, the industry has no choice but to accept these inefficiencies and associated costs. <u>ACSA's view on competition</u> From the first round of the Public Participation process (PPP) ACSA started raising concerns that the establishment of CWA would introduce competition, potentially impacting its long-term sustainability. ACSA stated that <i>"We however do not support the development of CWA into an airport which processes scheduled commercial domestic and international traffic for the following reasons:</i> <i>• We believe that the two airports will compete for the same scheduled commercial domestic and international traffic and will therefore not be financially sustainable."</i> Despite demonstrating that the projected growth in the market, exceeds CWA's projections, ACSA has maintained this position. CWA emphasises that maintaining the free working of market forces is fundamental to ensuring competitive and fair business practices. In alignment with the Competition Act, market entry should be encouraged and not be prevented. Furthermore, state-owned entities, like ACSA, are expected to compete with private sector. The White Paper on National Transport Policy, 2021, which states that <i>"Competition, whether for or in the market, will be encouraged where possible, and economic regulation will be applied where appropriate. In the transport sector, a level playing field will be provided, in which state-owned companies (SOCs) are expected to compete with private sector players without undue shielding from competitive forces"</i> Competition will drive, amongst other benefits: • Improved efficiencies

			• Service innovation • Cost reductions • Growth • Infrastructure investment A competitive environment ensures that airlines, passengers and businesses benefit from improved services, fair pricing and enhanced connectivity, ultimately driving sustainable development. By embracing market diversity and infrastructure expansion, CWA reinforces the principle that competition provided for in South Africa's air transport policies. It would strengthen rather than weaken the aviation sector, supporting long-term regional and economic progress. <u>The need for a second commercial airport in Cape Town</u> As per previous responses to ACSA, CWA has adopted an integrated planning approach and remains acutely aware of CTIA's development plans. It is reaffirmed that the need and desirability of CWA extends beyond the provision of additional capacity, encompassing broader strategic, economic and operational motivations that contribute to regional aviation growth. 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. The CWA development is driven by a commitment to market expansion, market diversification and operational efficiency, rather than restricting growth. It aims to broaden industry opportunities, enhance efficiency and maximise profitability for the airlines and provide more choice for passengers. CWA recognises the importance of delivering mutually beneficial solutions to the aviation industry as a whole to ensure sustainability not just for the airport operator but also for the entire aviation ecosystem.

			Foundational elements driving the justification for CWA and the airport's strategic importance (also refer to DEIAR, Section 5, Needs and Desirability section) are: Addressing the Critical Need for General Aviation Capacity: Currently, the GA market in Cape Town is fractured with an incomplete offering in terms of available infrastructure and facilities. Aircraft operations are determined by runway and infrastructure capability, where only the bottom and top end of the market are currently served. On the one end is CTIA with 3.2km runway, capable of facilitating all GA, however given the size and scale of scheduled commercial operations, with priority appropriately granted to scheduled commercial airlines, it is a challenging environment for GA to thrive. On the other end are the current airstrips with runway lengths less than 900m and no landing instrumentation, catering only for light recreational flying, training and some fire & rescue operations. These include Stellenbosch Airfield and Morningstar Flying Club, both of which are municipally owned with no possible room for expansion. Of the airfields listed, they are also totally constrained in terms of hangar capacity, with no further room for light aviation to grow. Core to CWA's value proposition is the provision of additional capacity for general aviation to unlock growth of the GA market. Establishing Cape Winelands Airport as a Reliever Airport for Cape Town: CTIA cannot function as its own reliever airport. CWA will serve as a strategic and complementary airport to CTIA, addressing temporary capacity constraints and enhancing regional aviation efficiency. CWA will play a critical role in providing airport redundancy for Cape Town, ensuring resilience, operational continuity and future-proofing aviation infrastructure. By establishing CWA as a strategic complement to CTIA, the region safeguards against unexpected disruptions, accommodates growing air traffic and reinforces global air connectivity. This approach not only enhances efficiency and flexibility within the aviation sector but also avoids the kinds of challenges we have seen in Cape Town's maritime and rail industry. CWA's strategic role is further emphasised in providing additional temporary capacity during major events in Cape Town, enhancing the city's ability to host large-scale international gatherings, conferences and sporting events. By offering overflow aviation infrastructure, CWA will ensure seamless airport

			operations, reducing congestion at CTIA and accommodating increased passenger demand. This flexibility strengthens Cape Town's competitiveness when bidding for global events like the Olympics, World Cup, major summits and international expos, positioning the city as a premier destination for event organisers. A strong competitive aviation system would increase the number of air travellers through the Cape Town area, enhance regional accessibility, and increase economic opportunities and international visibility, making Cape Town a more attractive host city on the global stage. Direct Scheduled Air Services into Cape Town: Domestic and International: For the past 30 years, ACSA has enjoyed a monopoly position in Cape Town and based on the feedback received from ACSA during this EIA process, it is clear that ACSA seeks to preserve its monopoly. This approach constrains industry growth and does not allow for adaption to the volatility, changing needs and competitive dynamics of the evolving aviation landscape. CWA has adopted an approach of measured conservatism when it comes to direct scheduled traffic growth. As stated above, CWA's air traffic forecast indicates that an aggregate commercial passenger traffic to the Cape Town region is expected to increase to 22,6 MPPA by 2050, where CWA is the beneficiary of 5,2 MPPA of that growth. Both CTIA and CWA's forecasts indicate growth into the region, highlighting the prospects of unlocking new tourism opportunities, the presence of underlying market demand and demonstrating that there is rising demand. Commercial Property Development: Airports become economic catalysts, supporting job creation and regional development. Attracting investment in non-aeronautical ventures not only enhances financial sustainability, but also creates opportunities for businesses, tourism and trade. The broader socioeconomic impact is significant—boosting employment, improving urban connectivity and establishing airports as multifunctional economic hubs that benefit communities and industries alike. CWA as a much closer Alternate Airport and Strategic Enabler for Airlines:

			• CWA plans to position itself as the preferred alternate airport for CPT for fuel planning purposes. • At only 25km away from CPT, compared to O.R. Tambo International Airport (JNB) at 1,274 km away, CWA will enable a significant reduction in the quantum of additional reserve fuel required to be carried each flight, as imposed by ICAO. • This reduction in take-off weight then translates into significant financial, operational and environmental benefits to the airlines for every direct scheduled flight inbound to CPT. The number of actual diversions therefore is irrelevant as it relates to the value that will accrue to the airline industry. • <u>Quantification these benefits</u>: CWA appointed an independent, German based company called PACE Aerospace Engineering and Information Technology to quantify the potential benefits to the airlines. Based on 2019 traffic volumes into CTIA and yielded the following results: • up to 110 million kg reduction in fuel requirements per annum • up to 18 million litres reduction in fuel consumption per annum • up to 56 million kg reduction in CO2 emissions per annum The above translates into a financial benefit to the airline industry of approximately R1,2 billion rand per annum. This value is currently lost to the airline industry without the existence of CWA. An important note is that this value is passed on to airlines while continuing to fly into CTIA. In addition to the significant financial benefits to the airline industry, CWA also enables a significant positive environmental impact. By designating CWA as an alternate airport for direct flights into CPT, airlines can accelerate their progress toward achieving Net Zero carbon emissions, reinforcing CWA's commitment to sustainable aviation. This strategic move not only supports global and national environmental goals but also unlocks valuable revenue growth opportunities, enhancing operational efficiency and profitability on the Cape Town route.

			With CWA's commissioning date estimated at 2027, another R3,6 billion would have been lost to airlines with direct scheduled services into CTIA up to the date of commissioning. ACSA claims that ACSA can provide sufficient capacity for the next 15 years and therefore CWA is not needed. Should CWA not be expanded for another 15 years, the loss of value to industry will be up to R18 billion. Up to 840 million kg reduction in CO₂ emissions will not be achieved. <u>Verification of the benefits:</u> Over the past two years, CWA has actively engaged with international and domestic airlines to validate and confirm the financial, environmental and operational benefits to its operations of the expanded CWA. Through rigorous internal validation processes, airlines have affirmed the advantages offered by CWA as the new alternate airport. [REDACTED] [REDACTED] [REDACTED] [REDACTED] These benefits are real, tangible and meaningful to the airline industry. Cape Winelands Airport's holistic, multi-criterion approach to aviation sustainability is designed to strengthen the industry, ensuring long-term viability without disrupting existing operations. Both CWA and CTIA can thrive, proving that sustainable growth and competition can coexist and complement each other. Airline partners stand to benefit significantly through enhanced profitability, improved environmental performance and optimised operational efficiency, reinforcing the value of diversification and infrastructure expansion. The introduction of CWA will not only support Cape Town's resilience but also positions Cape Town as a more competitive and globally connected destination. This balanced approach ensures progress within an evolving market landscape. EAP response: The PACE report referred to above was provided as part of the EIAR as Appendix 15.

		2.3. CTIA currently manages record-breaking passenger volumes without experiencing any measurable stress. The 2024 financial year saw CTIA handle 350,000 additional international daily passengers above its 2019 pre-COVID numbers, which stayed within the available operational limits. There is no indication that CTIA infrastructure restricts tourism development. Further, the Applicant has not demonstrated that the CWA Expansion Project has any capability or prospects of unlocking new tourism opportunities.	2.3 CWA response: As stated in section 2.2 above: CTIA currently processes 10 million passengers per annum (MPPA). It is our understanding that ACSA conducted an independent air traffic forecast for CTIA and ACSA confirmed that their air traffic forecast for scheduled commercial annual passenger volumes for 2050 is 23,6 MPPA into the Cape Town region, where CTIA is the sole beneficiary of this growth. This is in keeping with the independent traffic forecast conducted for CWA, which indicates that an aggregate commercial passenger traffic to the Cape Town region is expected to increase to 22,6 MPPA by 2050, where CWA is the beneficiary of 5,2 MPPA of that growth. Both forecasts indicate growth into the region, highlighting the prospects of unlocking new tourism opportunities. ACSA's point of contention is that ACSA should be the sole beneficiary of this growth. CWA disagrees with this position. In addition, as highlighted in section 2.2 above, there multiple reasons why a second airport is required in Cape Town particularly noting that capacity is not the only driver in considering a second airport for Cape Town.
		2.4. The ultimate capacity as per the Master Plan for CTIA is 45 million passengers; CTIA's current capacity with existing infrastructure is 14.5 million passengers, and it is currently processing 10 million passengers. Therefore, there is sufficient capacity for future growth. ACSA already has regulatory approval and confirmed budget for several capacity-enhancing projects. The need and desirability of the CWA Expansion Project must be considered in the context of the available spare capacity at CTIA, which is determined in terms of the National Aviation Policy and the National Airports Development Plan ("NADP").	2.4 CWA response: Please refer to section 2.2 above. CWA reiterates that available capacity is not the only consideration for the need of a second airport. Throughout the public participation process, ACSA has relied on its Development Plans and Master Plan as grounds of its Objection. In summary, the Development Plans make provision for ACSA's activities up to 2050 with a capacity of 23,6 million passengers per annum (MMPA), while the Master Plan makes provision for ACSA's activities until it reaches a capacity of 45 million passengers per annum (MPPA), 40 to 50 years from now. ACSA's comments during the public participation process are predicated on the idea that ACSA is entitled to all of the growth in the aviation sector in the Western Cape.

			It is respectfully pointed out that, as a responsible company, discharging its obligations to manage Company Airports, in developing its Master Plan, ACSA is simply planning for the future, as any other responsible company would do. However, ACSA's Master Plan has no statutory status; is not binding on third parties or organs of state; and therefore no more weight should be given to ACSA's Master Plan, than the strategic plan of any other I&AP. If ACSA has failed to take into account the possibility that another airport may legitimately compete for a part of the aviation sector's business in the Western Cape, the Master Plan may have to be revised, as it would for any other change in the operating environment. That is the nature of a strategic plan. An airport master plan serves as a guiding document for that airport, shaping future possibilities rather than guaranteeing infrastructure development. It is a conceptual roadmap, identifying development priorities, expansion possibilities and strategic goals, but it does not include detailed execution steps, funding commitments or regulatory approvals required for implementation. Its success depends on market forces, financial backing, government policy and operational feasibility, making it an evolving blueprint rather than a fixed commitment. Practical execution depends on board of directors, government approvals, financing, market demand and stakeholder coordination, all factors that go beyond the scope of a master plan. The presence of CTIA's master plan does guarantee the additional capacity it envisions. It also has no statutory status and is not binding on CWA.
		2.5. The Applicant states: "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'. The incorrect narrative that CTIA does not have capacity has been addressed on numerous occasions during the CWA Expansion Project EIA process. As part of the G20 Summit schedule of meetings, the Cape Town area is hosting approximately 15 meetings, where CTIA serves as the port of entry. In addition, many large-scale sporting events have been hosted in and around the Cape Town area over the past years, which illustrates CTIA's ability to accommodate additional surges in demand. It must be	CWA response: Refer to the following articles highlighting the missed opportunity for Cape Town due to the lack of airport redundancy. Cape Town 'disappointed' as Joburg gets to host G20 Summit thanks to airports, hotels: https://www.news24.com/business/economy/g20-summit-joburg-pips-cape-town-ethekwini-as-host-city-thanks-to-airports-hotels-20241028 GTA's Head: Destination Marketing and Communication Barba Gaoganediwe told Tourism Update that Cape Town has not met the specific infrastructural criteria needed to accommodate the volume of high-level delegates

		noted that countries develop airports for sustained air traffic growth rather than sporadic events.	attending the summit. "Johannesburg exceeded the criteria required to host the G20. These requirements included the number of available international airports, accommodation near airports and venues that would not cause disruptions to the general public," he said: https://www.travelnews.co.za/article/johannesburg-defends-g20-summit-readiness There is need for a reliever airport in Cape Town. As previously stated, CWA, as a reliever airport will perform multiple functions, from relieving congestion at CTIA during times of temporary increased activity or providing redundancy to the City of Cape Town in times when the airport is closed for an extended period of time. As a reliever airport: • 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. • CWA will contribute toward continuity of economic activity (trade and tourism) in the event of an extended closure at CTIA. • CWA could provide additional temporary or permanent capacity during peak periods (slot constraint times and peak seasons noting the seasonal nature of visitor trends) • CWA will offer redundancy in the event of catastrophic fires, structural failures, fuel or power supply interruptions etc, etc Added to that the benefits of having a second airport, as is the case with most major prospering cities, will ensure full redundancy in the event of a failure of infrastructure, services or systems at either of the two airports.
		2.6. The Applicant's assertion that the CWA Expansion Project could serve as a necessary diversion airport is equally unfounded. CTIA only had two runway closures during the year 2023 and despite this, operational resilience was achieved through secondary cross-runways and displaced threshold procedures. The information presented by the Applicant in the Draft EIA fails to support the need for establishing an entirely new	EAP Response: The proposed project is for the expansion of the existing airport with existing aviation rights at an existing airport.

		commercial airport as aircraft fuel reserve planning does not warrant such development. The CWA Expansion Project is positioned to be an unnecessary and unjustifiable project, which fails to meet the legitimate requirements of the aviation sector in the Western Cape region.	CWA response: If environmental authorisation is granted, CWA's role as a diversion airport will be a fact, not a matter of speculation. ACSA's claim is made without supporting evidence. The fact that CTIA experienced only two runway closures in 2023 is irrelevant to the discussion and further highlights that ACSA fundamentally misinterprets the concept of airport redundancy, contingency planning and CWA's role as a diversion airport for fuel planning purposes. The value generated for airlines extends beyond actual diversion events. It is realised on every flight for airlines with direct scheduled services inbound to CTIA. As stated in section 2.2 above: CWA as a much closer Alternate Airport and Strategic Enabler for Airlines: Also refer to DEIAR, Section 5, Needs and Desirability section. • CWA plans to position itself as the preferred alternate airport for CPT for fuel planning purposes. • At only 25km away from CPT, compared to O.R. Tambo International Airport (JNB) at 1,274 km away, CWA will enable a significant reduction in the quantum of additional reserve fuel required to be carried each flight, as imposed by ICAO. • This reduction in take-off weight then translates into significant financial, operational and environmental benefits to the airlines for every direct scheduled flight inbound to CPT. The number of actual diversions therefore is irrelevant as it relates to the value that will accrue to the airline industry. • <u>Quantification these benefits:</u> CWA appointed an independent, German based company called PACE Aerospace Engineering and Information Technology to quantify the potential benefits to the airlines. Based on 2019 traffic volumes into CTIA and yielded the following results: • up to 110 million kg reduction in fuel requirements per annum • up to 18 million litres reduction in fuel consumption per annum • up to 56 million kg reduction in CO2 emissions per annum

		CONFIDENTIAL	The above translates into a financial benefit to the airline industry of approximately R1,2 billion rand per annum. This value is currently lost to the airline industry without the existence of CWA. An important note is that this value is passed on to airlines while continuing to fly into CTIA. In addition to the significant financial benefits to the airline industry, CWA also enables a significant positive environmental impact. By designating CWA as an alternate airport for direct flights into CPT, airlines can accelerate their progress toward achieving Net Zero carbon emissions, reinforcing CWA's commitment to sustainable aviation. This strategic move not only supports global and national environmental goals but also unlocks valuable revenue growth opportunities, enhancing operational efficiency and profitability on the Cape Town route. With CWA's commissioning date estimated at 2027, another R3,6 billion would have been lost to airlines with direct scheduled services into CTIA up to the date of commissioning. ACSA claims that ACSA can provide sufficient capacity for the next 15 years and therefore CWA is not needed. Should CWA not be expanded for another 15 years, the loss of value to industry will be up to R18 billion. Up to 840 million kg reduction in CO₂ emissions will not be achieved. <u>Verification of the benefits:</u> Over the past two years, CWA has actively engaged with international and domestic airlines to validate and confirm the financial, environmental and operational benefits to its operations of the expanded CWA. Through rigorous internal validation processes, airlines have affirmed the advantages offered by CWA as the new alternate airport. These benefits are real, tangible and meaningful to the airline industry.
		2.7. As regards weather, it is most likely to be similar at both the CTIA and CWA, being only 22 kilometres apart, so weather-related diversions from CTIA are likely to also impact CWA. The Appendix 22 "Alternate Aerodrome Feasibility Study", which is not an independent study, uses	CWA response: CWA is in agreement with ACSA that there will be similar weather conditions at CTIA and CWA. The benefits to industry will still be derived as the selection

		weather information from CTIA's Automated Weather Observing System, as CWA does not have any weather data, and provides an unconvincing explanation as to why this data can be applied to CWA. Stakeholders and airmen have reported that the fog prevalent at CWA will take longer to lift than at CTIA. This is due to radiation fog and the fact that CTIA has stronger winds to lift the fog. The presence of water, vegetation, grass, and natural vegetation prevalent at CWA will have a negative impact on fog and low visibility operations, making CWA less suitable as an alternate airport, as shared in the EIA submission.	of an alternate airport is a regulatory requirement for every departing flight as it is a planning activity. Airlines were issued with the weather reports as part of their internal assessment to determine whether CWA will be a suitable alternate airport for their direct scheduled operations into CTIA. Following their assessments which included their own weather data sets, and noting the similar weather conditions, they concluded that CWA will be suitable as a planning alternate airport for 95% and above of the time.
		2.8. In addition, it would be irresponsible to advise airlines to reduce fuel uplift based on this speculation in the CWA business case to reduce diversion fuel, especially when aircraft cannot land at both CTIA and CWA. This poses a serious safety risk to the Western Cape, and a more detailed analysis would be required. It is of utmost concern that no mention is made of the safety risks involved. Such a presumption is irresponsible, and further studies are imperative to safeguard the safety of passengers. The protection and well-being of all stakeholders within our airspace should remain top priority.	CWA response: ACSA's statements regarding safety risk are inaccurate and uninformed. The viability of CWA as an alternate airport has been rigorously evaluated by the airlines. This comprehensive assessment was conducted by multi-disciplinary and cross-functional teams, including Chief Pilots, Pilots, Network Planners, Dispatch Teams and Operational Experts, all specialists in their respective fields. Through internal validation and due diligence, these airlines have confirmed that CWA meets the criteria as a suitable alternate airport for fuel planning purposes. These industry professionals possess deep expertise in aviation safety requirements, ensuring that all aspects of operational integrity and risk management are fully understood and accounted for. CWA will be a licensed aerodrome, subject to the same rigorous safety, rescue and firefighting services (RFFS), instrument approach, runway length, and meteorological requirements as any alternate airport used in fuel planning. Further, the decision to designate an airport as an alternate is made by the airlines themselves and can't be taken without approval through each airline's Safety Management System (SMS) by their flight planning and dispatch departments. Thus, if an airline deems it unsafe to designate CWA as an alternate for a particular flight, then the airline will not do so for that particular flight. The reduced fuel uplift is thus a by-product of the optimised planning and is only applicable when airlines are permitted to designate CWA as an alternate airport, after a thorough risk assessment by the airline taking into

			consideration meteorological and other factors expected to be present at the time of landing as prescribed by each airline's Safety Management System. The Alternate Aerodrome Feasibility Study (Appendix 22) indicated that even after considering weather, CWA will be suitable for selection as an alternate for >95% of the year. See below excerpt from Pg 16 of Appendix 22: <i>"The results of the weather analysis indicate that CWA is very well suited to serve as a destination alternate. Regarding the weather situation, it is expected that CWA can be planned as the destination alternate aerodrome for CPT during 95,66% of the annual operating time. Compared to other destination alternate aerodromes over the world, this is a remarkably high availability."</i>
		2.9. Part 1: The Applicant cites on numerous occasions in their responses the welcomed 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". The statement must be read in the context that ACSA has no mandate on the licensing of airports or preventing the development of non-ACSA airports, as these matters fall within the mandate of the South African Civil Aviation Authority ("SACAA") and the Department of Transport.	CWA response: Part 1 ACSA's CEO stated (on Moneyweb, on SAFM on 29 January 2025) 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". CWA welcomed this statement, with which it agreed. However, it now appears that this statement is being qualified or even retracted. ACSA says in its Comment and Objection that "the statement must be read in the context that ACSA has no mandate on the licensing of airports or preventing the development of non ACSA airports as these matters fall within the mandate of the CAA and the Department of Transport (paragraph 2.9 of the Objection). That is not disputed. However, the Objection goes on to say that "ACSA does, however, as the licence holder of airports, have a mandate to protect both its own customers, stakeholders and the national interest in terms of safe and efficient airport operations." It is unclear how an objection to an application for environmental authorisation amounts to protection of customers, stakeholders or the national interest. It is respectfully submitted, firstly, that the CEO's initial statement was correct and that the two airports can coexist and complement each other, and

Part 2: ACSA does, however, as the license holder of airports, have a mandate to protect its own customer, stakeholder and national interests in terms of safe and efficient airport operations.

secondly, that it is not legitimate to use an environmental process to advance anti-competitive interests.

CWA response: Part 2

The proposed expansion of CWA does not compromise safe and efficient operations. Safety is and will remain paramount to CWA, ensuring that all operations meet the strictest regulatory and industry requirements for the benefit of passengers, airlines and the broader aviation sector. CWA will remain steadfast in upholding the highest safety standards, adhering to global best practices.

With experienced airport professionals leading this development, there is a deep understanding of what it takes to operate a safe and efficient airport. Their expertise will ensure that stringent safety protocols, industry best practices and operational excellence remain at the core of CWA's vision, reinforcing its commitment to the highest standards of aviation safety and reliability. Airports are highly regulated environments.

The proposed CWA expansion will inject efficiency in the broader aviation ecosystem, by unlocking significant financial, environmental and operational advantages to airlines.

The claim that CWA will cause inefficiencies in Western Cape is also not supported by evidence. CWA is being developed to enhance regional airspace efficiency through Performance-Based Navigation (PBN) and strategic integration.

1. Performance-Based Navigation Enables Efficient, Predictable Operations

CWA will use Performance-Based Navigation procedures—such as Area Navigation (RNAV), Standard Instrument Departures (SIDs), Standard Terminal Arrival Routes (STARs), and approaches—which allow for precise, repeatable flight paths independent of ground-based navigation aids. This reduces route spacing, supports optimal climb/descent profiles and improves traffic flow management.

		Part 3: The need and desirability of the CWA project must be considered in the context of the available spare capacity at CTIA, which is determined in terms of the National Aviation Policy and the National Airports Development Plan.	<u>2. Fast-Time Simulation Confirms Compatibility</u> A 2023 Fast-Time Simulation demonstrated that CWA's routes can safely coexist with CTIA traffic without conflict, using existing airspace structures enhanced by Performance-Based Navigation. The simulation confirmed that traffic from both airports can be independently sequenced and managed. <u>3. Multi-Airport Efficiency and Resilience</u> CWA adds capacity, redundancy and resilience to the Western Cape network. It reduces overreliance on CTIA and supports regional growth. With Performance-Based Navigation and centralised flow management (e.g., Central Airspace Management Unit, CAMU), multi-airport regions are globally recognised as efficient, not problematic. CWA will improve—not harm—airspace efficiency through modern navigation technologies, validated simulations and alignment with global best practices. ACSA's assertions of inefficiency are incorrect and ignore both the design approach and international standards for multi-airport airspace management. CWA response: Part 3 Please refer to section 2.2, where the foundational elements driving the justification for CWA and the airport's strategic importance are reaffirmed. As stated above, ACSA's main ground of Objection is that the amended draft EIAR fails to demonstrate the need and desirability of the expansion of the CWA, which requirement is mandatory for the granting of the EA. Its primary basis for this argument is that the CTIA provides sufficient facilities to meet all projected passenger demand until 2050. That is, with respect, the same as saying that one should never build a new shopping centre because the existing one can meet the demands of customers for the foreseeable future. ACSA states further, that the need and desirability of the CWA must be considered in the context of the available spare capacity at the CTIA which is determined in terms of the national aviation policy and the national airports development plan. As such, ACSA argues, "the CWA expansion project

			constitutes a disproportionate response to an unproven aviation need”. These statements emphasise ACSA’s binary approach to aviation development in the Western Cape and its mistaken belief that it is entitled to all of that. While it is acknowledged that ACSA has a duty, like any other company, to ensure its own sustainability, it cannot rely on its historical monopoly of the provision of aviation services in the Western Cape to insist on the right to do that in future. Put differently, it cannot argue that it is entitled to all of the growth in the aviation sector in the Western Cape simply because it has always done so before. Section 2.2 above, offers clear, data-driven and industry validated reasons as to why Cape Town requires a second airport.
		2.10. As such, the CWA Expansion Project constitutes a disproportionate response to an unproven aviation need. The information presented by the Applicant in the Draft EIA fails to support the need for establishing an entirely new commercial airport, as aircraft fuel reserve planning, and airport capacity does not warrant such development. The CWA Expansion Project is positioned to be an unnecessary and unjustifiable project, which fails to meet the legitimate requirements of the aviation sector in the Western Cape region.	EAP Response: The proposed project is for the expansion of the existing airport with existing aviation rights at an existing airport. CWA response: Please refer to section 2.2, where the foundational elements driving the justification for CWA and the airport’s strategic importance are reaffirmed. The need and desirability of the CWA Expansion Project is based on the normal evolutionary expansion of an existing airport to facilitate air services to a larger gauge and regularity, which will introduce airport competition within the broader Cape Town region. That follows a similar process as another independently owned airport, Lanseria, did in Gauteng. Lanseria evolved from a very small rural airport to one which now provides competitive services as those provided by ACSA at OR Tambo International Airport within the Johannesburg and Gauteng region. The evolution of CWA will establish competition as opposed to the protection of CTIA’s monopoly within the larger gauge and frequency of operations. That does not amount to an “entirely new commercial airport”, nor a “disproportionate response to an unproven aviation need” and is necessary and desirable.

			<u>A more strategic approach to airport development is essential</u> The Western Cape is adopting a structured approach to growing air traffic into the region. Through the air access initiative, the region has seen consistent and robust growth since its inception in 2017. While Wesgro Air Access focusses on growing trade and investment, agencies like Cape Town Tourism focusses on positioning Cape Town as a destination of choice. It is our understanding that ACSA conducted an independent air traffic forecast for CTIA. ACSA confirmed that their forecast for scheduled commercial annual passenger volumes for 2050 is 23,6 MPPA (million passengers per annum). This is in keeping with the independent traffic forecast conducted for CWA, which indicates that an aggregate commercial passenger traffic to the Cape Town region is expected to increase to 22,6 MPPA by 2050. Both forecasts indicate growth into the region, highlighting the prospects of unlocking new tourism opportunities and the need for additional airport infrastructure. ACSA's point of contention is that ACSA should be the sole beneficiary of this growth. To ensure that we don't restrict growth into the Western Cape it is critical to ensure that the available aviation infrastructure is able to meet the demand, with an emphasis on the sustainability of the broader aviation sector. The expansion of CWA airport has a direct correlation to this. CWA urges ACSA to refrain from drawing conclusions on behalf of the aviation sector and the Western Cape when assessing the legitimacy of industry requirements. To ensure a fair and objective evaluation of the CWA expansion, it is essential to separate what serves ACSA's interests from what is truly beneficial for the aviation sector and the broader Western Cape region. The opportunities and benefits that CWA's expansion presents will remain inaccessible if ACSA continues to preserve and protect its monopoly. A more strategic approach to airport development is essential, one that not only ensures ACSA's sustainability but also unlocks new opportunities for growth of the broader aviation sector. By embracing competition and expanding infrastructure, this approach would enhance the sustainability and profitability of airlines, ultimately driving economic development and contributing to the growth of both the region and South Africa.

		2.11. Therefore, the motivation for need and desirability falls short of the legal and evidentiary thresholds under NEMA and the EIA Regulations and must be regarded as insufficient to support an EA Grant Decision.	EAP response: the concerns related to this comment have been addressed above. The EAP is of the opinion that the motivation for need and desirability complies with the content requirements and will enable the CA to reach a decision.
		3. SECOND GROUND OF OBJECTION: THE OPERATIONAL SUSTAINABILITY OF CTIA WILL BE NEGATIVELY IMPACTED BY THE CWA EXPANSION PROJECT	-
		3.1. Our view is that the operational sustainability of the CTIA, which is a critical component of regional and national air infrastructure, will be negatively impacted by the proposed CWA Expansion Project. The Draft EIA fails to adequately address this impact, as required by section 240(1)(b)(iv) of NEMA, which obliges the competent authorities who consider an application for an environmental authorisation to take into account all relevant factors, including any feasible and reasonable alternatives to the activity which is subject to the application.	EAP response: All cumulative impacts for the proposed project are assessed by specialists and included in their reports and in the amended draft EIAR. Appendix 1 (2) (d) refers to requirements in terms of Basic Assessment reports. The process applicable to this project is Scoping and EIA and not Basic Assessment (due to the trigger of Listing Notice 2 listed activities by the proposed project scope). Alternatives that are not reasonable or feasible have not been included in the EIA process. CWA response: CWA has previously provided an extensive response, demonstrating that ACSA's sustainability is not at risk, with ACSA's regulatory framework designed to provide robust protection. As long as ACSA does not overinvest in infrastructure, by matching capital asset investment to the activity levels driven by demand, ACSA will be sustainable. ACSA's monopoly-driven approach raises concerns, as it seeks to bypass key infrastructure development principles by limiting competition. The expansion of CWA does not threaten ACSA's operational sustainability, provided it follows prudent business practices. By adapting to market shifts and increasing competition, ACSA can maintain stability while ensuring responsible infrastructure investment. The existing

			regulatory framework safeguards ACSA from financial risk, as long as investments are strategic and aligned with actual demand, rather than excessive expansion. This is further validated by 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. ACSA's monopoly status does not eliminate its responsibility to follow a structured approach in infrastructure development, ensuring alignment with Infrastructure Development Life Cycle principles. A disciplined, strategic investment framework allows ACSA to allocate capital efficiently, avoiding unchecked expansion that disregards market shifts, evolving industry demands and changing economic conditions. Operational sustainability will depend on how well each phase of the Infrastructure Development Life Cycle is executed with sustainability in mind. It will be irresponsible of ACSA to blindly continue with infrastructure investment without adjusting their input parameters informed by a review of the strategic landscape and environment. ACSA's view that infrastructure development can proceed based on demand projections and development plans, which disregards broader market shifts and industry evolution is flawed. This deviates from internationally endorsed life cycle frameworks, which mandate agile responsiveness and continuous adjustment to changing conditions. In promoting operational sustainability, there are several control mechanisms in line with the Infrastructure Development Life Cycle that safeguard responsible investment decisions by airport developers and owners, like ACSA, prior to the investment decision: • Period reviews: Periodic reviews to reassess traffic forecasts, ensuring infrastructure plans remain relevant in a changing market. • Funders assessment of investment viability: It is common practise for debt funders evaluate several key factors when assessing an airport operator's investment viability, ensuring financial stability and long-term profitability.

			This will include assessing the viability of the investment under various passenger growth scenarios. • For ACSA: Investment in efficient infrastructure, secures guaranteed returns through tariffs. ACSA's insistence on adhering rigidly to a fixed plan runs counter to Infrastructure Development Life Cycle principles, which prioritise adaptive recalibration in response to evolving conditions. It further stands in contrast to globally endorsed best practices by IATA and ICAO that promote demand-responsive, adaptable and cost-effective infrastructure planning.
		3.2. In the present circumstances, the EA Application relies on flawed international comparisons to justify the CWA Expansion Project. For example, reference is made to global cities such as London, Washington D.C., and Milan, which are fundamentally incomparable to Cape Town because unlike Cape Town, these cities serve populations in the tens of millions and are major economic hubs with substantial international air traffic volumes, which are conditions that justify the multiple commercial airports. Even in such contexts, airports are typically spaced 35 to 50 kilometres apart, which ensures operational and market separation.	CWA response: CWA is located from 46 km away from CTIA by road and 22km as the crow flies. The argument that comparing Cape Town to cities like London, Washington D.C. and Milan is fundamentally flawed misinterprets the purpose of the comparison. These international examples were not cited to equate Cape Town's market size with global megacities but rather to demonstrate a critical and well-established principle - that multiple high-traffic airports can coexist safely and efficiently in close proximity when supported by proper airspace design and operational procedures. The reference to these cities in the CWA Concept of Operations is strictly to demonstrate what is operationally achievable—not to draw economic or demographic parallels. It is intended to show that physical distance alone is not a limiting factor. In fact, many of the airports referenced operate within 20 to 30 kilometres of each other. The 22-kilometre separation between CWA and CTIA (as the crow flies) is entirely within the range of international best practice. Suggesting that this distance is "too short" ignores decades of successful precedent and misrepresents the realities of modern airspace management. To dismiss these examples is to ignore global standards and constrain Cape Town's growth based on outdated assumptions.

		3.3. By contrast, the proposed CWA Expansion Project would be located a mere 22 kilometres from CTIA. This short distance is inadequate to justify the establishment of a second major commercial airport and raises serious concerns about airspace safety, market saturation, and infrastructure inefficiency. These matters all fall squarely within the competent authority's duty to consider under section 240(1)(b) of NEMA and regulation 31(2)(k) of the EIA Regulations, which requires a cumulative impact assessment.	EAP response: The concern re infrastructure inefficiency is noted. The TIA, land use planning reports (Appendix 24 and Appendix 36 of the EIAR), together with the Bulk Engineering report (Appendix 37) and Electrical Engineering report (Appendix 38) consider and address infrastructure impacts and needs. In relation to aviation related infrastructure, refer to responses by CWA provided below. Airspace safety is dealt with in NACO report (Appendix 18, 19, 20, 21 & 22). Market saturation is dealt with in Appendix 15, 22 and Section 5 in the EAIR. CWA response: ACSA states that <i>“By contrast, the proposed CWA Expansion Project would be located a mere 22 kilometres from CTIA. This short distance is inadequate to justify the establishment of a second major commercial airport...”</i> The distance data provided by ACSA is factually incorrect: - The distance between CWA and CTIA is approximately 22km as the crow flies. - The distance between CWA and CTIA is approximately 46km driving distance. - The distance between Lanseria and ORTIA is approximately 40 km as the crow flies. - The distance between Lanseria and ORTIA is approximately 54,6km driving distance. <u>Addressing ACSA's Concern regarding Market Saturation</u> As stated in section 2.2 above: CTIA currently processes 10 million passengers per annum (MPPA). It is our understanding that ACSA conducted an independent air traffic forecast for CTIA and ACSA confirmed that their air traffic forecast for

			scheduled commercial annual passenger volumes for 2050 is 23,6 MPPA into the Cape Town region, where CTIA is the sole beneficiary of this growth. This is in keeping with the independent traffic forecast conducted for CWA, which indicates that an aggregate commercial passenger traffic to the Cape Town region is expected to increase to 22,6 MPPA by 2050, where CWA is the beneficiary of 5,2 MPPA of that growth. Both forecasts indicate growth into the region, highlighting the prospects of unlocking new tourism opportunities, the presence of underlying market demand and demonstrating that there is rising demand. Growth forecasts confirm that the region's air travel capacity has not yet met its full demand potential, underscoring that saturation is not a limiting factor. ACSA's point of contention is that ACSA should be the sole beneficiary of this growth. CWA disagrees with this position. <u>Addressing ACSA's Concern regarding Infrastructure Inefficiency</u> This has been addressed in section 3.1. <u>Addressing ACSA's Concern regarding Airspace Safety</u> ACSA relies for its objection on air traffic and safety concerns. As explained above, these issues are the remit of the Civil Aviation Authority ("CAA"). CWA currently operates under an aerodrome licence issued by the CAA ("CAA Licence") but is obliged to obtain an amendment to that licence, which process is regulated by the Civil Aviation Act, 13 of 2009, read with the 2011 Regulations made under that Act. It is noteworthy that although the CAA and DOT are I&AP's, they have not raised any concerns during the EIA process. The same applies for ATNS, the Air Traffic and Navigation Services SOC Ltd, mandated and responsible for ensuring safe, expeditious and efficient air traffic solutions throughout South

			Africa and a large part of the Southern Indian and Atlantic Oceans, comprising approximately 10% of the world's airspace. Regulation 139 sets out the requirements of an application for an amendment to an aerodrome licence. These include: i) an aerodrome manual referred to in regulation 139.02.11 for aerodrome licence with a Category 4 and higher; j) plans of an aerodrome; k) written approval from the local government concerned; l) an environmental impact report, if required in terms of the National Environmental Management Act, 1998, 107 of 1998; m) written approval from all relevant government institutions listed in Document SA CATS 139; n) 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; o) particulars of non-compliance with, or deviations from- iii. appropriate aerodrome design, operation or equipment standards prescribed in this Part; or iv. appropriate airspace classification requirements prescribed in Part 172; and p) appropriate fee as prescribed in Part 187. As is evident, the technical details of airspace safety will be considered by the CAA, which is best qualified to assess that. ACSA will have an opportunity to comment to the CAA as the competent authority on that application to advance any technical arguments that it may have. It should also be remembered that CWA is staffed by senior people with extensive experience in operating safe and efficient operations, many who held senior positions at ACSA. There is no reason to believe that those people would act irresponsible regarding airspace and operational safety.

			<u>Technical Considerations:</u> Furthermore, the planned integration of CWA poses no structural or systemic risk to the safety or efficiency of air navigation in the region. This conclusion is backed by modelling, expert review and regulatory engagement. Technical Evidence Outweighs Speculative Concerns: ACSA's comment relies on unfounded assumptions and mischaracterises the evidence presented in support of the proposed development. The concern raised about operational conflict, congestion and safety within the Cape Town terminal airspace is refuted by objective data and validated technical processes. The Fast-Time Simulation (FTS) conducted as part of the airspace planning process for CWA was based on the traffic projections included in the CWA traffic forecasts and modelled against realistic peak scenarios. The simulation outcomes provide verifiable, quantified evidence that simultaneous operations at CWA and CTIA are both feasible and safe, without compromise to airspace efficiency or existing operations. ICAO-Aligned Methodology and Regulatory Compliance: The use of FTS in airspace and procedure design is standard international practice, aligned with ICAO Document 9971 and endorsed by regulators and ANSPs worldwide. The simulations form part of a comprehensive airspace planning approach that includes: The use of FTS in airspace and procedure design is standard international practice, aligned with ICAO Document 9971 and endorsed by regulators and ANSPs worldwide. As indicated previously, the simulations form part of a comprehensive airspace planning approach that includes: • A validated Concept of Operations (ConOps) • Instrument Flight Procedure (IFP) design and validation • Stakeholder engagement; and • Environmental and regulatory approvals governed by the South African Civil Aviation Authority (SACAA) under Part 173. Assertions that FTS is insufficient are technically inaccurate and ignore global norms in airspace design and capacity planning.

			ATNS Involvement Confirms Safety and Feasibility: The Air Traffic and Navigation Services (ATNS), South Africa's Air Navigation Service Provider, was formally part of the development team for the CWA Concept of Operations. At no point during the development or review of the ConOps did ATNS raise any objections or concerns regarding the integration of CWA operations into the regional airspace. ATNS, as the only authority responsible for the safe and efficient management of South African controlled airspace, has full insight into traffic flows, separation standards, sector capacity and ATM architecture. Their active involvement and lack of objection serves as strong, authoritative support for the feasibility and safety of the CWA plans. The position of ATNS therefore reinforces the expert view as reflected in the simulation outcomes and procedure planning that CWA can be safely integrated alongside CTIA. Attempting to undermine the credibility of formal simulations and operational assessments conducted with the air navigation service provider (ANSP) and in line with ICAO protocols is both misleading and inappropriate. CTIA and CWA Can Safely Coexist: The airspace surrounding Cape Town is already a multi-user environment that supports general aviation, scheduled commercial flights and military operations. The simulations conducted confirm the ability of the TMA to support concurrent operations, including: • Separation assurance under all forecasted conditions • Capacity balancing between CTIA and CWA; and • Procedural compatibility with existing SID/STAR networks. Structured Integration and Oversight: CWA is being developed through a methodical, phased process consistent with national and international best practice: • The Concept of Operations was developed in collaboration with ATNS • IFP development and validation are underway, aligned with Part 173 and Part 97 processes This approach demonstrates a commitment to safe and scalable development. Conclusion: The Fast-Time Simulation results are based on CWA's forecasted traffic and the direct participation of ATNS and the ongoing regulatory

			oversight by SACAA, coupled with the professional work done by qualified airspace specialists, confirms that the integration of CWA into the Western Cape airspace system is both technically viable and operationally safe.
		3.4. The EA Grant Decision would be in contravention of the competent authority's statutory duty to consider reasonable and feasible alternatives as required by section 240(1)(b)(iv) of NEMA. This duty is further reinforced by Regulation 1(b) of the EIA Regulations, which requires that the scoping process, through a consultative process, must include a comparative assessment of the need and desirability of the activity in the context of the preferred location. The Draft EIA fails to meaningfully assess alternative locations, or modes of enhancing air traffic capacity in the Western Cape, nor does it in provide appropriate comparisons of airports within South Africa. By disregarding viable alternatives, including the expansion of CT IA, which is detailed below, the Draft EIA fails to meet the requirements of section 240 of NEMA and stands to be set aside.	EAP response: Refer previous responses on process (Basic assessment vs EIA / Scoping) and responses provided on Alternative location. No Alternatives that are not reasonable or feasible will be included in the EIA process. The proposed project is for the expansion of an existing airport at an existing location. CWA response: The EIA Regulations do not make the assessment of alternative sites mandatory, but contemplate the possibility that no alternatives of any kind will be explored. They require a scoping report to explain, where “no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such” (Appendix 2, section 2(1)(g), emphasis added). As has been explained, because this is the proposed expansion of an existing airport, exploring alternative locations is not an option. Exploring the expansion of CTIA is, self-evidently, also not an option for the applicant, as an ACSA owned airport, only ACSA would have the ability to do that and the information meaningfully to assess that alternative.
		3.5. A more appropriate comparison is with other South African provinces. Gauteng is the only province in South Africa that has two international airports: O.R. Tambo International Airport ("ORTIA") and Lanseria International Airport, which are approximately 39 kilometres apart. The market justification for this dual-airport system lies in the province's dense population, strong regional economic base, and high volume of air traffic.	CWA response: Much in the same way as CWA's Expansion Project, Lanseria also followed a similar growth path of normal evolutionary expansion of an existing airport to facilitate air services to a larger gauge and regularity. Lanseria's expansion was driven by an airline, Comair, in an attempt to differentiate between its BA brand and its LCC brand, Kulula.com. Comair even provided essential funding for Lanseria's initial upgrade to handle scheduled traffic.

			Soon this was followed by Mango, SAA's LCC and later by FlySafair. This was much like the secondary airports established in Europe to cater for LCCs. ACSA's statement that Lanseria's market justification for this dual-airport system lies in the province's dense population, strong regional economic base, and high volume of air traffic is therefore incorrect.
		3.6. In contrast, the Western Cape has a population of approximately 7 million, less than half of Gauteng's, and a more limited domestic air traffic profile. The distance between the CTIA and the proposed CWA Expansion Project is a mere 22 kilometres, which is much shorter than the distance between ORTIA and Lanseria. The reality is that there is currently no underlying demand, density, or diversification to justify a second commercial hub. Establishing a second commercial airport within such a short distance in a smaller, less economically diverse province would likely lead to duplication, inefficiencies, and unsustainable competition for limited traffic, rather than complementarity.	Read with comment 3.3 CWA response: The distance data provided by ACSA is factually incorrect: • The distance between CWA and CTIA is approximately 22km as the crow flies. • The distance between CWA and CTIA is approximately 46km driving distance. • The distance between Lanseria and ORTIA is approximately 40 km as the crow flies. • The distance between Lanseria and ORTIA is approximately 54,6km driving distance. <u>Addressing ACSA's comment that there is currently no underlying demand</u> Refer to sections 2.2, 2.3 and 3.3 which indicate that ACSA conducted an independent air traffic forecast for CTIA and ACSA confirmed that their forecast for scheduled commercial annual passenger volumes for 2050 is 23,6 MPPA (million passengers per annum). This is in keeping with the independent traffic forecast conducted for CWA, which indicates that an aggregate commercial passenger traffic to the Cape Town region is expected to increase to 22,6 MPPA by 2050. Both forecasts indicate growth into the region. These growth projections reflect expectations of rising demand and is built on the assumption that underlying demand already exists or will soon materialise. The projected growth also signals that the market hasn't yet absorbed all potential travel need, meaning underlying demand is indeed present.

			The claim by ACSA that no underlying demand exists starkly contradicts its own projections, which are predicated on latent and rising demand in the regional air travel market. As stated before, ACSA's point of contention is not that there is no underlying demand - on the contrary its own growth projections demonstrate the opposite - its point of contention is that ACSA should be the sole beneficiary of this growth. A stance that raises significant concerns around equitable market access. <u>Addressing ACSA's concerns regarding Diversification</u> See Section 3.5 for a summary of Lanseria's phased development and its role in enabling airlines to introduce distinctive service offerings within a competitive framework as an example of organic growth and diversification in the market. <u>Addressing ACSA's concerns regarding potential duplication, inefficiencies and unsustainable competition for limited traffic</u> Matters relating to inefficiencies and duplication are addressed in section 3.1. In response to ACSA's concern regarding unsustainable competition for limited traffic, please refer to sections 2.2, 2.3, 3.3 and 3.6.
		3.7. In light of the above, we submit that the competent authority cannot lawfully issue an EA Grant Decision as the EA Application and the Draft EIA fail to comply with section 240 of NEMA. The inadequate consideration of reasonable and feasible alternatives, including the optimisation of the existing CTIA infrastructure, renders the EA Application and the Draft EIA procedurally and substantively flawed. To issue an EA Grant Decision would constitute an irrational and unlawful exercise of administrative discretion, and the only rational and lawful course of action is for the EA	EAP response: Refer previous responses on process on Alternative location. No Alternatives that are not reasonable or feasible will be included in the EIA process. The proposed project is for the expansion of an existing airport at an existing location. Public participation has been concluded, and the EAP is of the opinion that the CA is in a position to decide based on all information submitted.

		Application to be refused, or at minimum, for the Applicant to be directed to revise the Draft EIA, which is to be followed by remission for reconsideration in accordance with the public participation process.	We dispute that the CA cannot lawfully grant an EA for the project. It is simply not possible for the applicant meaningfully to explore the expansion or optimisation of CTIA, an ACSA-owned airport, as an alternative to the expansion of CWA. It is also disputed that no reasonable and feasible alternatives were considered. Where it has not been possible to explore more alternatives, that has been fully motivated. The application is fully compliant with section 240 of NEMA. With regard to alternatives, which appears to be ACSA's primary concern, section 240(1)(b)(iv) requires the CA to take into account all relevant factors, which may include "<i>where appropriate</i>, any feasible and reasonable alternatives to the activity which is the subject of the application and any feasible and reasonable modifications or changes to the activity that may minimise harm to the environment" (emphasis added). It has been fully explained why a site alternative cannot be explored for the expansion of an existing airport. All of the other requirements of section 240 have been fully met, and there is no reason why the CA should not grant the EA.
		4. THIRD GROUND OF OBJECTION: CONCERNS REGARDING POTENTIAL SOCIO-ECONOMIC IMPACTS ON CTIA AND SURROUNDING INDUSTRY	-
		4.1. The proposed CWA Expansion Project creates major socio-economic problems that endanger the well-established aviation system operated from CTIA. CTIA operates as an essential economic hub and serves as the vital economic core of the Western Cape region, all of which has not been adequately assessed in the Draft EIA. CTIA maintains a large workforce inclusive of direct and indirect jobs, which spreads across aviation and tourism sectors, alongside the logistics and hospitality industries. The Cape Town workforce is at risk of major job losses because of traffic diversion to another airport, which may lead to the elimination of certain economic activities instead of developing new ones. For example, companies like surrounding hotels and car rental operations as well as logistics services and catering services, which are dependent on the CTIA's flight volumes, will be severely impacted by the shift of certain air traffic to CWA, which could lead to business	Response from socio-economic specialist: This is addressed on p. 85 of the Socio-Economic Impact Assessment. CTIA is likely to experience a level of displacement for travellers and business activity that may impact direct and indirect employment associated with CTIA. Notwithstanding, it is possible and highly likely that the CWA could have what is termed a demonstration effect on CTIA and other businesses. This implies that the introduction of CWA could trigger upgrades and improvements, as opposed to a situation where Cape Town only has one airport and no alternatives. Such improvements would result in business growth and innovation, which would not have occurred without the demonstration impact the CWA is likely to experience. This is a sound economic principle, resulting in additional agglomeration benefits that lead to efficiency gains for firms when they cluster in nodal areas. Demonstration effects and agglomeration are not mutually exclusive.

		contraction and possible downsizing or closure. These risks translate directly into potential job losses, economic inefficiencies and social instability in the Western Cape region.	EAP response: The Socio-economic IA states <i>The CTIA may experience a level of product market displacement¹⁵ from travellers (also referred to as demand displacement) over the medium term</i>, where medium term refers to 5 – 10 years post construction.
		4.2. The Applicant seems to suggest that airport expansion creates market demand. Our assertion is that this is false as airports operate according to existing passenger requirements. In fact, airport traffic emerges from regional economic growth and tourism trends together with population expansion rather than infrastructure development. The Draft EIA fails to provide adequate evidence to demonstrate that the CWA Expansion Project will attract new, independent demand as opposed to merely redistributing existing traffic from CTIA. Furthermore, the Draft EIA does not show that existing infrastructure at CTIA is insufficient to meet foreseeable demand in the region.	CWA response: This has been addressed in sections 2.2, 2.3 and 3.3 above.
		4.3. Section 23(2)(b) of NEMA requires that social, economic and environmental impacts be considered in an integrated manner, so as to ensure sustainable development. The principle of sustainable development, as described in the preamble of NEMA, obliges the competent authority to ensure that environmental authorisations are not granted for activities that undermine economic resilience or social welfare. In this instance, the Draft EIA does not include a thorough socio-economic impact assessment and has, therefore, failed to meet the requirements of sustainable development. The Applicant's failure to identify or quantify new regional economic benefits, especially in the context of anticipated disruptions to an already functioning aviation and tourism value chain, indicates that the CWA Expansion Project cannot be said to support responsible economic development, as contemplated in NEMA.	EAP response: The aspect of sustainable development and assessment of the criteria is included in the amended draft EIAR Section 5 and complies with the NEMA Guideline on Need and Desirability in terms of content and process. The scope of the proposed project is for the expansion of an existing airport at an existing site and does not relocate economic activity from CTIA and CWA as part of the scope of the project. The assumption by the IAP <i>“The proposed CWA Expansion Project near CTIA will most likely disrupt aviation and tourism value chains and redirect important investments, which will weaken regional economic stability. The proposal represents both an untimely measure and an unprogressive economic approach”</i> is not supported by the findings of independent specialist studies conducted as part of the EIA process, nor has any information supporting this statement been provided by the IAP.

			Response from socio-economic specialist: The Socio-Economic Impact Assessment is prepared in accordance with specialist guidelines for social and economic input into EIA processes. These guidelines have been followed in the preparation of the socio-economic impact assessment report, ensuring conformity with the requirements for specialist input.
		4.4. The relocation of economic activity between the two nodes, particularly in the absence of demonstrated net economic gains, presents a high likelihood of undermining existing public and private investment in aviation infrastructure, resulting in inefficient duplication of services and weakening the region's competitive position. As such, the EA Application falls short of the constitutional imperative of section 24(b)(iii) of the Constitution, which guarantees everyone with the right to ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.	EAP response: The statement by the IAP is not supported by the findings of independent specialist studies conducted as part of the EIA process, nor has any information supporting this statement been provided by the IAP. Cumulative impacts on CTIA were considered in the Socio-Economic IA (Appendix 23)
		4.5. For these reasons, ACSA submits that the EA Grant Decision should not be issued until such time that the Applicant has conducted a comprehensive, evidence-based socio-economic impact assessment and has demonstrated that the CWA Expansion Project will result in a net economic benefit which aligns with the principles of sustainable development.	EAP response: The EAP is of the opinion that the EIA process has been concluded and that the CA will be in a position to make a decision based on the information submitted. CWA response: Contrary to ACSA's submission that CWA's EIA is procedurally and substantively flawed, CWA submits that it conducted a comprehensive, evidence-based socio-economic impact assessment, has been responsive to the comments of I&APs and has demonstrated that the CWA Expansion Project will result in a net economic benefit which aligns with the principles of sustainable development.

		5. FOURTH GROUND OF OBJECTION: CONCERNS REGARDING POTENTIAL IMPACT ON AIRSPACE 5.1. The proposal to develop the CWA into a full commercial airport is problematic in terms of the management and safety of the airspace within the Western Cape region, particularly Cape Town, which is a limited and shared resource. The introduction of a second commercial airport within this space, without proper air route design, modelling, or airspace simulations, poses risks of operational conflict, congestion and safety challenges. The Applicant reiterates "that their 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 response: This has been addressed in section 3.3 above.
		5.2. The reliance remains speculative and the reliance on preliminary Fast-Time Simulation studies is not sufficient to support assertions of independent operations. The International Civil Aviation Organisation, as referred to by the Applicant, essentially requires comprehensive scenario testing, including peak hour air traffic, and consideration of future expansion plans of existing airports, such as CTIA. The lack of such a rigorous analysis is concerning, given the feasibility of safely integrating the CWA Expansion Project into the existing airspace structure	CWA response: The assertion that the reliance on preliminary Fast-Time Simulation (FTS) studies is speculative and insufficient to support claims of independent operations does not reflect international best practice or current industry standards. In fact, Fast-Time Simulation is recognised as a critical and widely accepted methodology in early-stage airspace design and development. ICAO Doc 9882 (Manual on Airspace Planning Methodology for the Determination of Separation Minima), specifically in section 5.2, endorses the use of FTS as an essential tool for evaluating the feasibility of airspace concepts, including the identification of potential conflicts, assessment of capacity, and support for separation standards under various traffic scenarios. The simulation conducted in this case aligns precisely with the intent and guidance provided by ICAO 9882. It provides a structured and data-driven environment to assess traffic flows, evaluate potential interactions between Cape Winelands Airport (CWA) and Cape Town International Airport (CTIA), and confirm that proposed concept flight paths do not pose any structural or procedural conflicts. Moreover, the FTS explicitly included peak-hour scenarios and has been calibrated to visualise traffic interactions using real-world and projected flight schedules, ensuring that both current and future growth considerations are factored into the results.

			Furthermore, the FTS offers a transparent and replicable methodology that serves as the industry benchmark at this stage of airspace development. It is not speculative; rather, it is a foundational step in ICAO's recommended phased approach to airspace change proposals, preceding live trials or real-time simulations. In light of the above, the conducted Fast-Time Simulation not only meets but exceeds the standard expected at this stage of concept evaluation, forming a sound basis to support the assertion that CWA can operate independently within the existing terminal airspace structure without compromising safety or efficiency.
		5.3. The current air navigation service provider has confirmed in several meetings, where representatives of CWA were present, that the impact on airspace in terms of safety and efficiency can only be finally confirmed once the detailed airspace design has been concluded, which includes arrivals and departure procedures for existing and future runways for both CT IA and CWA. This assessment must be a condition for the future development of CWA, where existing and future developments in line with the approved master plan at CTIA (most notably the second runway) are not compromised.	CWA response: The suggestion that the impact on airspace in terms of safety and efficiency can only be confirmed after detailed airspace design, while partially true in the context of final implementation, overlooks the structured and phased approach prescribed by ICAO for airspace development. ICAO Doc 9992 and Doc 9882 both emphasise the importance of progressive validation, beginning with conceptual development, followed by simulations and stakeholder consultation — long before detailed design. Critically, the current air navigation service provider (ANSP) was an active participant in the development of the original Cape Winelands Airport (CWA) Airspace Concept of Operations. The ANSP not only contributed to the conceptual framework but also reviewed and supported the use of Fast-Time Simulation (FTS) and other early-stage validation activities as appropriate and aligned with international best practices. The simulation and concept testing conducted to date are consistent with ICAO's stepwise methodology and fully appropriate to this phase of airspace development. It is therefore misleading to imply that no meaningful assessment of impact can occur until full procedural designs for both Cape Town International Airport (CTIA) and CWA are in place. While detailed designs are essential for operational implementation, the initial analyses — including validated Fast-Time Simulations and stakeholder reviews — have already demonstrated that the concept flight paths are structurally independent, with no anticipated

			impact on CTIA's existing or future operations, including the planned second runway. Furthermore, the CWA airspace development has been conducted in accordance with ICAO principles from the outset, and the remaining phases will likewise proceed through due ICAO process. This adherence to international procedure ensures that all safety, efficiency and integration concerns will be addressed systematically. In conclusion, the current stage of airspace planning for CWA is robust, appropriate and compliant with ICAO frameworks. It benefits from the direct involvement and endorsement of the ANSP and already includes key validations that provide a strong foundation for continued development.
		5.4. Section 24(4)(a)(iii) of NEMA provides that every application for an environmental authorisation must provide a description of the environment likely to be significantly affected by the proposed activity. We submit that the Applicant's omission of comprehensive airspace modelling constitutes a fatal flaw of the Draft EIA and undermines the reliability of the findings thereof Furthermore, section 2(4)(a)(viii) requires the competent authority to make decisions that are informed by the precautionary principle, which mandates that where there is inadequate information such as in the present Draft EIA, a cautious approach should be adopted	EAP response: The baseline environment was assessed during the Scoping Phase and included in the EIA process. This included socio-economic, heritage, agricultural, biophysical, ad aviation. CWA response: The assertion that the absence of comprehensive airspace modelling constitutes a fatal flaw in the Draft Environmental Impact Assessment (EIA) misrepresents both the legal obligations of Section 24(4)(a)(iii) of the National Environmental Management Act (NEMA) and the actual content and purpose of the airspace assessments already undertaken. Section 24(4)(a)(iii) requires that the environment likely to be significantly affected by the proposed activity be adequately described. In the case of the Cape Winelands Airport (CWA) expansion, this requirement has been met. The Draft EIA includes a detailed description of the surrounding environment, including the airspace context, supported by expert studies and a Fast-Time Simulation (FTS) aligned with ICAO Doc 9882. The FTS, which is the industry standard at this stage of airspace development, demonstrates the feasibility of operations within the existing airspace structure without impacting Cape

			Town International Airport (CTIA). This modelling forms a sufficient and internationally accepted basis for determining whether the proposed activity could result in significant airspace-related environmental impacts. Moreover, the process followed to date has included active participation by the air navigation service provider, who contributed to the airspace Concept of Operations and validated the approach taken. The inclusion of this high-level assessment is consistent with the level of detail required at this phase of environmental authorisation. As the project progresses, more detailed airspace design will naturally follow through ICAO's formal planning and safety processes — processes which are independent but complementary to NEMA. Regarding Section 2(4)(a)(viii), which invokes the precautionary principle calls for responsible and cautious decision-making in the face of real uncertainty and material risk. In this case, no such uncertainty exists: the simulation demonstrates that there are no anticipated adverse interactions with CTIA's current or future operations, and that the proposed development can proceed within a well-defined, phased ICAO framework. Therefore, invoking the precautionary principle here is misplaced, as the best available scientific and operational information has already been applied — including scenario testing with conservative assumptions. In summary, the Draft EIA appropriately reflects the nature and scope of the proposed activity's interaction with the surrounding airspace. It incorporates internationally endorsed methods and the findings are well supported by expert analysis and institutional validation. There is no legal or procedural basis to declare the omission of more detailed modelling a "fatal flaw."
		5.5. Given these concerns, it is important that a comprehensive airspace management plan be developed, including detailed simulations and stakeholder input from all relevant stakeholders, including ACSA and SACAA. Such a plan should address potential operational conflicts, ensure compliance with international safety standards, and provide a clear framework for the integration of CWA into the existing airspace infrastructure. Without this, the proposed CWA Expansion Project poses unacceptable risks to the safety and efficiency of air traffic operations in	CWA response: Please refer to section 3.3 above. The call for a comprehensive airspace management plan, including detailed simulations and stakeholder input, reflects a general understanding of international best practice. However, the claim that such a plan does not exist or that its absence poses "unacceptable risks" to the safety and efficiency of

		the region. The competent authority is, therefore, urged to reject the EA Application, or to request further studies and consultation prior to making a decision.	air traffic operations is inaccurate and disregards the structured process already undertaken. A full Concept of Operations (ConOps) has been developed for Cape Winelands Airport (CWA) in accordance with ICAO guidance (Docs 9854 and 9882), with the direct involvement of the air navigation service provider (ATNS) and other relevant stakeholders. This ConOps was supported by Fast-Time Simulation (FTS) studies — an internationally recognised validation tool — which confirmed that proposed operations at CWA can be safely integrated into the existing airspace structure without conflicting with Cape Town International Airport (CTIA), including CTIA’s future developments such as its planned second runway. In addition to the ConOps and simulation work, airspace specialist studies were also commissioned. These specialist assessments, conducted by qualified professionals with domain expertise in air navigation, confirmed the viability and safety of the proposed development. All airspace-related specialist studies support the development at CWA. These findings have been integrated into the Draft Environmental Impact Assessment (EIA), which presents a comprehensive and technically sound evaluation of the proposal. The phased approach followed to date aligns fully with ICAO’s airspace development process, which begins with high-level concept validation (such as simulations and stakeholder engagement) and proceeds to detailed airspace and procedure design only once principle approvals are secured. Final design and operational integration will remain subject to ongoing regulatory oversight, including further review and approval by SACAA and ATNS. It is therefore incorrect and unfounded to suggest that the absence of later-phase design elements constitutes grounds to reject the Environmental Authorisation (EA) application. The precautionary principle is not violated; rather, the best available science, modelling and institutional input have already been applied. The CWA Expansion Project poses no demonstrable risk to the safety or efficiency of air traffic operations in the region. Accordingly, there is no legal or procedural basis for withholding or delaying the EA decision.

		6. FIFTH GROUND OF OBJECTION: CONCERNS REGARDING POTENTIAL IMPACT ON FUEL ACCESS AND SUFFICIENCY	-
		6.1. ACSA submits that the Draft EIA fails to adequately assess the potential adverse effects that the CWA Expansion Project may have on the sufficiency of aviation fuel supply in the Western Cape region. CTIA operates under major fuel supply limitations as it is remotely located from the national fuel pipeline network. CTIA faces persistent operational and logistical problems because it almost exclusively relies on road tanker deliveries for its fuel requirements. The proposed CWA Expansion Project creates substantial concerns regarding the already constrained supply chain infrastructure. The Applicant claims that its nearby location to CTIA enables better fuel planning as flights need less reserve fuel. Whilst this appears advantageous to CWA, it also means that CTIA will be restricted in its fuel supply sources. The Draft EIA fails to properly evaluate or resolve fuel competition risks between the airports and does not analyse how extending the fuel delivery network affects CTIA and the Western Cape region in its entirety.	CWA response: 6.1-6.2 CWA remains dedicated to ensuring our development enhances the region's aviation infrastructure without compromising existing operations and we are confident that it will demonstrate our commitment to not only securing CWA's fuel needs but also contributing positively to the region's overall fuel supply stability, growing supply capability and increasing aviation fuel supply chain competitiveness. Addressing Supply Chain Concerns: We understand that CTIA currently faces challenges with the continuity of Jet A-1 fuel supply, given its reliance on a single refinery in Cape Town. Alternative Supply Sources: CWA is actively exploring and securing multiple supply agreements with various suppliers, both locally and internationally. These agreements are intended to diversify our fuel sources, thereby reducing the dependency on any single refinery or supply chain. This diversification strategy is central to our plan to enhance the overall resilience of the regional fuel supply network and to open up new supply chain opportunities which will enhance competition in the region. Storage Capacity and Buffer Stock: The storage facilities at CWA are being designed not only to meet our operational needs but ultimately also to contribute to the region's overall fuel storage capacity. By increasing the storage infrastructure, we ultimately aim to create additional buffer stock that can be utilised, including by CTIA, in case of any disruptions in the supply chain, thereby ensuring that there is an increase in available stock. Supply Chain Management: We are aware of the complexities involved in splitting the supply chain between two significant airports. To mitigate this, we are implementing advanced supply chain management strategies to ensure that fuel demand is met efficiently without placing undue strain on the current single refinery in Cape Town and associated logistics operations.
		6.2. The failure to include this assessment remains crucial as the Draft EIA disregards how the new commercial airport could affect fuel delivery stability and create higher operational costs and additional disruptions during busy periods for CTIA. The CWA Expansion Project creates unavoidable risks to critical regional aviation supply security as there is no defined strategy or infrastructure plan to handle shared fuel supply logistics.	

			Collaborative Approach: CWA is committed to working with CTIA, ACSA and other stakeholders to align our fuel supply strategies as far as possible, within the ambit of the law. We believe that through collaboration, we can enhance the region's fuel security and address any potential challenges proactively to the benefit of all players.
		7. SIXTH GROUND OF OBJECTION: LEGALLY DEFICIENT DRAFT EIA	
		7.1. ACSA submits that the Draft EIA is legally deficient, particularly Appendix 1 thereto. These deficiencies substantially and materially impact the adequacy of the Draft EIA as a decision making tool in respect of the EA Application.	EAP response: Appendix 1 to the amended draft EIAR is the EAP CV. It is unclear how Appendix 1 is legally deficient, as the requirement for inclusion of the EAP CV is complied with.
		7.2. The Draft EIA does not evaluate the cumulative impacts of the CWA Project Expansion on the regional infrastructure, particularly in light of its proximity to the CTIA. Although specialist studies on the "combined operations" of CTIA and CWA are included in Appendix 21 of the Draft EIA, they do not provide a detailed cumulative impact analysis on the investment in infrastructure, air traffic management in the region, or economic competition. This omission is significant in light of Appendix I(2)(d) of the EIA Regulations, which explicitly requires the assessment of potential cumulative impacts.	EAP response: All cumulative impacts for the proposed project are assessed by specialists and concluded by the EAP. These are included in specialist reports and in the amended draft EIAR. Appendix 1 (2) (d) refers to requirements in terms of Basic Assessment reports. The process applicable to this project is Scoping and EIA and not Basic Assessment (due to the trigger of Listing Notice 2 listed activities by the proposed project scope. Refer previous responses on infrastructure assessment pt 3.3. Air traffic management in the region is addressed through the TSAM simulation study (Appendix 21) and the CONOPS (Appendix 18). CWA response: These items have been comprehensively responded to during all four rounds of the PPP, via the C&R report and included the draft EIAR. Please also refer to sections 2.2, 2.3, 3.1, 3.3 and 3.6 above as it relates to matters of competition and infrastructure investment.

			<u>Response to “does not provide a detailed cumulative impact analysis on air traffic management in the region”</u> While it is acknowledged that Appendix 21 of the Draft EIA includes specialist studies on the “combined operations” of CTIA and CWA, the assertion that it fails to provide a detailed cumulative impact analysis on air traffic management in the region is unfounded. Appendix 21, supported by subsequent simulation outputs and technical assessments, provides a robust review of integrated operations between CTIA and CWA. These studies demonstrate that the forecasted traffic volumes at CWA—based on a conservative and staged growth model—can be accommodated within the existing and planned airspace structure. Furthermore, the proposed Air Traffic Management (ATM) solutions are designed to operate fully within the declared capacity of the regional airspace system. The cumulative impact has been appropriately considered by evaluating simultaneous operations, route structure compatibility, conflict risk and sector capacity. Importantly, simulations and modelling exercises, such as the fast-time simulation referenced in the appendix, confirm that projected operations at CWA will not degrade safety or efficiency within the Cape Town Terminal Manoeuvring Area. It must also be emphasised that any future changes in operations will remain subject to oversight by the South African Civil Aviation Authority (SACAA), which governs the allocation of airspace resources based on capacity and safety considerations. In this context, the introduction of CWA operations has been structured specifically to support manageable integration and sustainable growth. In conclusion, both the traffic forecast and ATM strategies for CWA have been developed in a way that ensures they remain within the existing airspace system’s declared capacity, with no material negative cumulative impact on regional air traffic management.
		7.3. The Draft EIA also has inadequate and incomplete information regarding CTIA's current and planned infrastructure, particularly the fact that CTIA	EAP response:

		has plans for a runway for Code 4F aircraft and foresees the handling of more passengers by 2050. Further, the Draft EIA ignores CTIA's already approved expansion plan that includes a runway realignment and terminal expansion, which will increase the number of passengers per year. These omissions are material, particularly as the Draft EIA frames the CWA Expansion Project as a necessary "reliever airport," without acknowledging that CTIA has existing and planned capacity to accommodate future aviation demand. This undermines the Applicant's justification for the proposed development and goes to the heart of the "need and desirability" test required in terms of the EIA Regulations.	Based on a comment received from the IAP during the Pre-Application Scoping Phase relating to the omission of the CTIA realigned runway and for recognition of the CTIA future second parallel runway; the relevant specialist study was amended to consider the realigned runway and the second parallel runway was not included (Refer Table 136 in the amended draft EIAR). Reasoning was provided in the C&R (Appendix 29A). No unauthorised expansion plans can be considered at this stage. The evidence in support of the reliever airport concept is provided in Section 5 of the amended draft EIAR, and based on historical evidence, specialist studies and sound business principles. It is by no means the core argument for the need and desirability section, but a contributing factor both economically and sustainability. CWA response: Please refer to section 2.2, where the foundational elements driving the justification for CWA and the airport's strategic importance are reaffirmed. As stated in 2.4 above: Throughout the public participation process, ACSA has relied on its Development Plans and Master Plan as grounds of its Objection. In summary, the Development Plans make provision for ACSA's activities up to 2050 with a capacity of 23,6 million passengers per annum (MPPA), while the Master Plan makes provision for ACSA's activities until it reaches a capacity of 45 million passengers per annum (MPPA), 40 to 50 years from now. ACSA's comments during the public participation process are predicated on the idea that ACSA is entitled to all of the growth in the aviation sector in the Western Cape. It is respectfully pointed out that, as a responsible company, discharging its obligations to manage Company Airports, in developing its Master Plan, ACSA is simply planning for the future, as any other responsible company would do. However, ACSA's Master Plan has no statutory status; is not binding on third parties or organs of state; and therefore no more weight should be given to ACSA's Master Plan, than the strategic plan of any other I&AP.

			If ACSA has failed to take into account the possibility that another airport may legitimately compete for a part of the aviation sector's business in the Western Cape, the Master Plan may have to be revised, as it would for any other change in the operating environment. That is the nature of a strategic plan. Similarly, Development Plans are not static plans. These plans are subject to periodic reviews to ensure that plans are informed by shifting market conditions. This is in keeping with Infrastructure Development Life Cycle best practices and IATA and ICAO endorsed approaches which promote demand-responsive, adaptable and cost-effective infrastructure planning. Please refer to section 3.1. ACSA also relies for its Objection on its plan to realign its existing runway. The right to realign the existing runway is contained in an environmental authorisation ("ACSA's EA") that was granted by the eight years ago on 23 May 2017 (under reference 14/12/16/3/3/2/446). ACSA's EA was initially granted for a period of five years; its validity was extended for a further 5 years and will lapse on 23 May 2027. It was made clear by the Department of Forestry Fisheries and the Environment when granting the extension that no further extensions will be granted (because the receiving environment may have changed significantly from when ACSA's EA was granted). It is public knowledge that the receiving environment has changed significantly since the original authorisation was granted on 23 May 2017. The planned area of development has experienced large scale invasion and sprawling of informal settlements including the surrounding areas i.e. the runway approach on the northern side of the planned new realigned runway which has material implications for aviation safety. Data on WinDeed.Lexis also suggests that other than the problem with vacant occupation, unresolved issues remain in terms of ownership and rezoning of the land. What is not clear is to what extent the abovementioned might represent substantial and significant changes in the baseline conditions at the time of the original authorisation granted in 2017. Should those changes be deemed as substantial and significant by the competent authority, it would be difficult for the DFFE to justify extending the validity of that environmental authorisation before it lapses in 2027. Those changes to the receiving environment may also justify its revocation now. If the environmental authorisation is to be amended, there will be a need for a new public consultation process. It therefore follows that

			ACSA may not implement its Proposed Expansion; these potential risk factors again highlight the important role that CWA will fulfill as a reliever and alternative airport to ensure continued and unfettered air access into region and the City of Cape Town. The reason for ACSA's failure to implement its Proposed Expansion is not explained, but ACSA's right to build it cannot translate to DEA&DP's obligation to sterilise any development which ACSA regards as a threat while that right remains valid. It is possible that ACSA may choose never to implement the right to implement its Proposed Expansion. If DEA&DP were to refuse to authorise any development objected to by any other I&AP (and so prevent fair competition), that would be an overreach of DEA&DP's powers, which would expose it to an appeal or review of its decision. DEA&DP's remit is a consideration of bio-physical and socio-economic impacts; it cannot properly protect ACSA from legitimate competition.
		7.4. In response to ACSAs previous comments on the Draft EIA, the EAP provided that: "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'. The argument that CTIA's approved expansion plan, that includes a runway realignment and terminal expansion, is an activity and not an impact in terms of NEMA is flawed. Although the second runway is an activity, the construction and operation thereof will have an environmental impact which must be assessed. Further, as this runway is not standalone but supplementary to the first (realigned) runway, which constitutes a	EAP response: The EAP stands by the statement. No NEMA authorised second parallel runway exists at this stage. When the IAP applies for NEMA authorisation of the second parallel runway, the impacts its construction and operation, and cumulative impacts, will need to be assessed by the Applicant. CWA response: Please refer to section 7.3.

		phased project, the cumulative impact will need to be considered as part of the EIA process. 7.5. Notably, no independent, peer-reviewed market demand study has been included in the Draft EIA to support the economic case for the second commercial airport. The only demand projections come from consultants allied to the Applicant's developer, with projected numbers that do not demonstrate how they relate to national aviation trends or the Department of Transport's forecasts. This is a clear contravention of Appendix 1 of the EIA Regulations, which calls for a justified opinion on need, desirability and feasibility of the proposed development.	EAP response: All specialists who provided input in the form of independent studies are objective and independent. No peer-reviewed market demand study is required by the EIA Regulations unless stipulated by the CA. The applicability of Appendix 1 of NEMA and Section 5 of the amended draft EIAR has been addressed above. Need and desirability and feasibility has been dealt with extensively throughout the EIA process. Response from socio-economic specialist: A market study falls outside the scope of the specialist's requirements for the preparation of a socio-economic impact assessment. The passenger traffic forecast study was assessed by Netherlands Airport Consultants (NACO) (Appendix 18) in terms of passenger demand and long-term market growth. This information is quoted as part of assessing the feasibility of the CWA airport and is considered credible, as it was prepared by a renowned airport consultant in the field. CWA response: <u>Market Demand</u> As stated in section 2.2 above: CTIA currently processes 10 million passengers per annum (MPPA). It is our understanding that ACSA conducted an independent air traffic forecast for CTIA and ACSA confirmed that their air traffic forecast for scheduled commercial annual passenger volumes for 2050 is 23,6 MPPA into the Cape Town region, where CTIA is the sole beneficiary of this growth. This is in keeping with the independent traffic forecast conducted for CWA, which indicates that an aggregate commercial passenger traffic to the Cape Town region is expected to increase to 22,6 MPPA by 2050, where CWA is the beneficiary of 5,2 MPPA of that growth. Both forecasts project regional growth, reinforcing the presence of strong market demand.

			ACSA's point of contention is that ACSA should be the sole beneficiary of this growth. CWA disagrees with this position.
		7.6. The Draft EIA's airspace capacity and safety assessments are based on the Concept of Operations and Airspace Capacity Study (Appendices 18 and 20), which are conceptual and theoretical. The studies do not model real-time operations under peak conditions, and they do not offer confirmed flight path separation or conflict resolution models. CTIA's flight corridors and the well-known challenges of managing parallel airports within a 22-kilometre radius of each other, call for much more thorough and substantiated airspace modelling than what is offered in the Draft EIA. SCAA's "no objection" is made without important conditions or outstanding approvals and, therefore, cannot be taken as conclusive.	CWA response: This has been addressed. Please refer to section 5.
		7.7. Furthermore, the Draft EIA does not present a clear link to other important spatial and aviation development plans, including the Western Cape Spatial Development Framework and the NADP. While Appendix 36 of the Draft EIA seeks to address planning policy consistency, it fails to discuss the NADP's priority node structure that identifies CTIA as the strategic hub for the region. There is no evidence that the CWA has been identified in any statutory planning document for development into a secondary commercial airport.	Response from town planner: The NADP is discussed in the CWA-draft-EIAR-18-March25 pages 86 and 386 to 390. Appendix 16-CWA-Civil-Aviation-Baseline-and-Site-Sensitivity-web, in Section 3.4.1. sets out clearly that: <i>"The proposed upgrade and expansion of CWA is being developed on a purely commercial basis, without government funding, on the principle of financial sustainability and viability. In this regard it aligns with the Policy Statement 15 in the White Paper on Civil Aviation Policy (2017). Moreover, as an upgrade of an existing airport it aligns with the preference expressed in the NADP (2015) for "the upgrading of existing airports over development of green-field airports." By proactively reaching out to the authorities responsible for land-use developments, spatial planning and local economic planning in the vicinity of the airport, CWA supports the integration of the airport in its environment.</i> <i>The NADP (2015), the NATMAP (2016) and the White Paper on Civil Aviation Policy (2017) support this approach by highlighting the concept of "airport cities" and "aerotropolises". Through its focus on commercial property development principles and integration into the so-called "landside" infrastructure, CWA embraces this concept. CWA is a private enterprise that,</i>

			<i>through the proposed development, aims to increase the options available to both GA and commercial aviation operators and users, and to serve the needs of its customers. This approach is fully in line with the NTP (2021) strategic objectives of supporting tourism and trade through the application of free market principles.”</i> AND <i>“4.1 Site alternatives</i> <i>Cape Winelands Airport purchased the former Fisantekraal aerodrome in 2020 with the explicit intention of developing it and growing aviation activity at the site. It is a licensed and active aerodrome with functioning infrastructure and facilities in place. In theory, it could be envisaged that the proposed development at CWA were to take place at an alternative location. However, it is not considered reasonable or feasible for the owner of CWA to purchase another site to pursue this development. Moreover, it should be noted that the NADP (2015) clearly expresses a preference of “upgrading existing airports” over the development of “green-field” facilities.”</i> Appendix 23 – CWA Socio-Economic Impact Assessment makes extensive reference to the NADP and situates CWA within its broader context. It seems this I&AP is under the impression that statutory approval must have been granted or identified first, before initiating an application with public participation, which is not the case.
		7.8. These deficiencies are obvious non-compliances with Appendix 1 of the EIA Regulations, which requires detailed and proper descriptions of the justification for the proposed activity, the justification for the choice of the proposed activity, comparison of all feasible alternatives, and description of assumptions, uncertainties and knowledge gaps. The Draft EIA presents the preferred alternative (Alternative 4) as if it were a fait accompli, assuming market demand and regulatory acceptance, with no evidence to support the assumption. As such, the Draft EIA fails to	EAP response: The applicability of Appendix 1 and the content and requirements of Section 5 in the amended draft EIAR has been addressed above. The development of the preferred Alternative 4 relied on inputs from IAPs, Stakeholders, specialists and technical design personnel. The development and listing of Alternatives occurs largely within the Scoping Phase, with further Alternative development within the EIA Phase as informed by IAP input and specialist assessment. The reasoning for the selection,

		provide sufficient legal and procedural standards for making informed decisions.	development and assessment of Alternatives is provided in Section 8 of the amended draft EIAR. Assessment of alternatives were 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 at an existing airport. The No Go Alternative was also assessed.
		7.9. These legal and procedural shortcomings constitute material non-compliance with the EIA Regulations and NEMA's environmental management principles under section 2. In particular, the Draft EIA fails to adopt a risk-averse and cautious approach, disregards cumulative effects, and undermines the integrated environmental management framework envisaged in section of NEMA.	EAP response: Compliance to the NEMA regulations in terms of process and content has been proven and the EAP is of the opinion that the CA is in a position to make a decision based on the information submitted. CWA response: This claim is disputed. The Draft EIA has comprehensively identified and assessed the impacts flowing from the expansion of the existing airport, which will enable the CA to adopt a risk averse approach when determining the application. It meets all the requirements of NEMA and relevant regulations.
		8. SEVENTH GROUND OF OBJECTION: NON-COMPLIANT WITH PAJA REQUIREMENTS	-
		8.1. PAJA was enacted to give specific effect to the constitutional right to just administrative action, guaranteed under section 33 of the Constitution. In terms of section 6(2)(e)(iii), (f)(ii), and (h) of PAJA, administrative action may be reviewed and set aside where the action was taken because irrelevant considerations were taken into account or relevant ones were not considered; the action is not rationally connected to the information before the administrator; or the action is so unreasonable that no reasonable person would have taken it. An EA Grant Decision based on the current Draft EIA would be unreasonable, procedurally unfair and irrational in terms of PAJA for the following reasons:	CWA response: The purpose of PAJA and its constitutional origins are not disputed. The grounds of a judicial review provided for by PAJA are also not disputed. Until the CA makes a decision on the application, and provides its reasons for doing so, it is not possible to pre-judge whether that decision will be a breach of PAJA on any of the grounds listed here. What is disputed is that the EIA conducted for the application has been procedurally or substantively inadequate. It is respectfully submitted that it has fully complied with the requirements of EIA Regulations.

		8.1.1. Failure to properly consider cumulative impacts: The EAP has failed to consider key cumulative impacts, particularly regarding the interaction between CWA and CTIA in terms of airspace safety, infrastructure duplication, and economic viability (see Sixth Ground of Objection above). The mandatory legal requirements in Appendix 1 of the EIA Regulations demand thorough examination of these material considerations which the Draft EIA does not adequately do.	EAP response: this comment is a duplication and has been addressed. Appendix 1 of the EIA Regulations refers to content requirements for Basic Assessment process. The process being followed for the proposed project is Scoping and EIA under Appendix 2, 3 and 4.
		8.1.2. Insufficient consideration of CTIA's approved expansion: The Draft EIA overlooks CTIA's planned and approved runway and terminal expansion and does not conduct a proper comparative needs assessment. An EA Grant Decision, if issued, would amount to an arbitrary and irrational administrative action, as it would have ignored a material factual development which directly affects the decision.	EAP response: this comment is a duplication and has been addressed.
		8.1.3. Bias and lack of independence in specialist input: The CWA Expansion Project received its market demand and aviation feasibility studies from consultants who had ties to the Applicant and its development partners. There is no evidence of independent or peer-reviewed evaluation, and no engagement with national aviation forecasts or transport planning policies. The reliance on unverified and incomplete information for administrative action would be unreasonable.	EAP response: this comment is a duplication and has been addressed.
		8.1.4. Assumption of market and regulatory acceptance: The Draft EIA makes incorrect assumptions about project approval and success through demand projections and regulatory cooperation and airspace integration without providing supporting evidence. A reasonable competent authority must base their conclusion on objective evidence, not hypothetical assumptions.	EAP response: this comment is a duplication and has been addressed.
		8.1.5. Failure to apply the principle of legality and rationality: The competent authority is required to act within the confines of the NEMA and PAJA. An EA Grant Decision in the face of critical	CWA response:

		knowledge gaps, contradictions, and material non-compliances with the EIA Regulations would breach the principle of legality and fail the rationality test under PAJA.	As is explained above, the EIA has complied with the substantive and procedural requirements of NEMA and the EIA Regulations and will provide the basis for a sound, rational and lawful decision by the CA.
		8.2. Additionally, in terms of section 6(2)(c) of PAJA, a decision must be procedurally fair. The failure to meaningfully respond to CTIA's detailed comments, including those concerning airspace conflict, constitutes a breach of procedural fairness in terms of section 6(2)(c).	CWA response: It is disputed that there has been any procedural unfairness in this process, CWA has, to the extent to which it is appropriate in an EIA process, fully responded to CTIA's detailed comments, including those concerning airspace conflict. As is explained above, those issues will be more fully explored by the authorities qualified and tasked to consider them, and ACSA will have an opportunity to participate in that process, too.
		8.3. Should the competent authority issue an EA Grant Decision placing reliance on the flawed Draft EIA and its deficient supporting studies, such a decision would constitute reviewable administrative action under PAJA, and any interested party, including ACSA, would be entitled to seek judicial review under section 6.	CWA response: It is disputed that that the EIA process has been flawed and that the Draft EIAR is substantively defective, for all of the reasons explained above. EAP response: after the decision is issued by the CA, the EAP will notify all registered IAPs, along with the appeal process to be followed should the IAP require.
		9. CONCLUSION	-
		9.1. The proposed CWA Expansion Project lacks justification as it does not align with current infrastructure, regional development goals or national aviation policies. A second commercial airport near CTIA lacks justification as the existing commercial airport maintains ample capacity to meet Western Cape aviation and tourism requirements. The projected socio-economic advantages of the CWA Expansion Project remain theoretical as they lack concrete evidence and fail to evaluate the possible material adverse impacts on CTIA and surrounding businesses as well as regional employment, fuel access and infrastructure. The Draft EIA fails to conduct necessary cumulative	EAP response: this comment is a duplication and has been addressed.

		impact evaluations whilst using outdated assumptions that support developer interests and ignores key stakeholder positions, particularly that of CTIA, as the designated aviation hub according to national and provincial planning frameworks.	
		9.2. The proposed CWA Expansion Project creates unresolved safety issues for airspace operations and the proposed mitigation measures lack testing and fail to provide sufficient solutions. In our view, the Applicant has failed to show that the development follows sustainable development principles, as defined in NEMA.	EAP response: this comment is a duplication and has been addressed.
		9.3. Therefore, ACSA objects against the EA Grant Decision for the reasons and on the grounds set out above and, in light hereof, respectfully submits that the EA Application should not be granted.	EAP response: this comment is noted.
		9.4. We trust you find the above in order and request that you kindly acknowledge receipt hereof.	The DEA&DP to acknowledge receipt.
420	Henk Pretorius - I&AP	Email dated 26 June 2025: 1. I trust you are well. I have not registered as an I&AP for this project. However, I'm interested to know if you have received Environmental Authorisation? If not yet. Please include me in the notification email.	1. This comment has noted. The IAP has been included within the IAP register for future notifications.
421	Brandon Layman - Department of Agriculture	Email dated 27 June 2025: 1. Please find attached comments from the WCDoA: LUM.	Email response provided 27 June 2025: 1. We will include your comments in the C&R
		Letter received via email dated 27 June 2025: AMENDMENT DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT PROPOSED EXPANSION OF THE CAPE WINELANDS AIRPORT: DIVISION PAARL PORTION 10 OF THE FARM NO 724 REMAINDER OF THE FARM NO 724 PORTION 23 OF THE FARM NO 724 PORTION 7 OF THE FARM NO 942 REMAINDER OF THE FARM NO 474 PORTION 3 OF THE FARM NO 474 PORTION 4 OF THE FARM NO 474	

		1. Your application of March 2025 has reference. The Western Cape Department of Agriculture (WCDoA) has no objection to the proposed application.	1. This comment is noted.
		2. Please note: - Kindly quote the above-mentioned reference number in any future correspondence in respect of the application - The Department reserves the right to revise initial comments and request further information based on the information received.	2. This comment is noted.
422	Elmar Conradie – Fly Safair	Email dated 7 July 2025: 1. Please see attached a letter of support for Cape Winelands airport.	Email response provided 7 July 2025: 1. I acknowledge receipt of your letter. We will include it in the Comments and Responses report.
		Letter received via email dated 7 July 2025: LETTER OF SUPPORT – CAPE WINELANDS AIRPORT (CWA) 1. Safair Operations Proprietary Limited (“FlySafair”) is pleased to provide this letter of support for the proposed Cape Winelands Airport (“CWA”) – a strategically located brownfield airport development in the Western Cape, South Africa. 2. As South Africa’s leading low-cost carrier (“LCC”) and a significant contributor to the domestic aviation market, FlySafair has worked tirelessly to expand access to affordable, reliable air travel across the country. In 2023 alone, FlySafair carried over 6 million passengers and was recognised by OAG as the most on-time airline in the world. We now operate more than 100 daily flights and continue to grow our domestic and regional footprint. 3. We recognise the need for additional airport capacity in the Western Cape— not just to accommodate future growth, but to improve the operational resilience and redundancy of the region’s airspace. The establishment of CWA adds critical support infrastructure from both a physical operations standpoint and as a designated alternate airport, which is essential for robust flight planning, emergency preparedness, and overall system reliability. 4. The airport’s location near the Cape Winelands and northern growth corridors of Cape Town positions it well to serve multiple demand centres across	EAP Response: The positive comment in support of the development is noted.

		business, tourism, and logistics. This decentralised positioning will support access to emerging catchments and ease pressure on existing infrastructure. 5. Secondary airports such as CWA are essential to the success of the low-cost carrier model. Around the world, secondary airports have enabled LCCs to thrive by offering lower airport charges, quicker turnaround times, and reduced airspace congestion. These efficiencies are fundamental to maintaining our high aircraft utilisation, low operating costs, and ability to offer affordable fares. 6. FlySafair welcomes CWA's approach to airport planning—prioritising scalable infrastructure, cost effective operations, and direct engagement with airline partners. These qualities will help unlock new route opportunities and improve connectivity for a growing number of South Africans and visitors. 7. We support airport developments that promote competition, unlock new economic nodes, and enhance the resilience of South Africa's aviation network. Cape Winelands Airport aligns with these objectives, and we look forward to continued collaboration as the project moves toward operational readiness.	

Submissions via the Cape Winelands Airport Website			
Website No.	Name & Presenting unit	Issue/ Concern	Response
Late Comments: 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]			
W306	WC Odebrett	We hope you fly directly to Europe soon!!	EAP response: This comment is noted. WC Odebrett has been registered as an IAP for the NEMA process.

W307	Allister Miles	Looking forward to having an international airport in the north and all the opportunities it will bring to the region	EAP response: This comment is noted. Allister Miles has been registered as an IAP for the NEMA process.
W308	Danielle Arends	Would like to have updates as I live in area nearby. I travel a lot, and this would be very convenient.	EAP response: This comment is noted. Danielle Arends has been registered as an IAP for the NEMA process.
W309	Nosenkosi Majangaza	I cannot express how happy I am about this New Airport that will be opened in cape wine lands it is a beautiful initiative to grow and create jobs for young people...I fully support this	EAP response: This comment is noted. Nosenkosi Majangaza has been registered as an IAP for the NEMA process.
W310	Ernst Eloff - Mialanro Project Consultants Pty(Ltd)	excited about new developments	EAP response: This comment is noted. Ernst Eloff has been registered as an IAP for the NEMA process.
W311	Amanda Booyens - Gutsy Culture	Love the gutsy idea of a second airport in Cape Town, adding convenience to more flyers as well as creating opportunities for jobs and businesses to thrive!	EAP response: This comment is noted. Amanda Booyens has been registered as an IAP for the NEMA process.

Amended Environmental Impact Assessment Report (DEA&DP Ref: 16/3/3/2/A5/20/2046/24; DWS Ref No: WU33620)

[45 day commenting period commencing on 19 March 2025 and up to and inclusive of 13 May 2025]

W312	Zingisani Moepa	Website enquiry dated 17 March 2025 1. I'm writing to enquire about the right person to talk to concerning the upcoming cape winelands airport. I am the secretary of kraaifontein development forum an area that is located very close to where the airport shall be upgraded and we work very close with fisantekraal leaders in most of the developments undertaken in the area. Therefore I would like to know when is the next public participation and will appreciate if you can share some contact details for the person/s responsible. Thank you and looking forward to your response	Email from CWA to IAP dated 18 March 2025: 1. Thank you for reaching out. In copy is Amanda, from PHS consulting – the company responsible for handling the public participation and all things linked to the EIA. It would be good for you to ask Amanda to register as an interested and affected party – this way you will receive all of the necessary information as well as notices about the upcoming public participation. Email from EAP to IAP:

			1. We will register you as an IAP for the proposed project and will communicate with you in due course regarding the next round of public participation.
W313	JJ Prinsloo - Prince Green Technology.	After working at Hong Kong Airport for 26 years and spending my last few years as the cargo operations manager (aircraft maintenance) I am very excited about this new development, I will be moving to the Paarl area soon and thing this will be fantastic for the area development. Good luck.!!	EAP response: This comment is noted. JJ Prinsloo has been registered as an IAP for the NEMA process
W314	Faizel Heuvel - Famcon Construction pty ltd	Dear Sir / Madam. Keep me updated.	EAP response: This comment is noted. Faizel Heuvel has been registered as an IAP for the NEMA process
W315	Tijan Oberholzer - Touch Down Africa	would be great for Tourism!!!	EAP response: This comment is noted. Tijan Oberholzer has been registered as an IAP for the NEMA process
W316	Mnininzi Kalazana - LIZU Solution	As a Cape Winelands resident I fully support the airport. This will bring much needed job creation, impact on our economy and an alternative to Cape Town International. This is very exciting. This has my 100% support.	EAP response: This comment is noted. Mnininzi Kalazana has been registered as an IAP for the NEMA process
W317	Asavela Siqangwe	Please register me as the Interested and Affected party as we would like to offer subbase course during the construction of this airport.	EAP response: This comment is noted. Asavela Siqangwe has been registered as an IAP for the NEMA process
W318	Percy Van Willingh	By establishing an airport means a lot for our surroundings, especially all the upcoming job opportunities and development of new business opportunities	EAP response: This comment is noted. Percy Van Willingh has been registered as an IAP for the NEMA process
W319	Christopher Jonsson - GT Aviation (Pty) Ltd	I stand by the proposal to have a new airport!	EAP response: This comment is noted. Christopher Jonsson has been registered as an IAP for the NEMA process
W320	Glen Eric Huysamer - T/A Glen IV Productions and Services	The Case for a Second International Airport in the Western Cape: A Vision for Growth and Innovation As a citizen of the Greater Cape Town area, I strongly support the development of an additional international airport in the Western Cape. The potential benefits of such an endeavour are vast, spanning multiple industries, including aviation, agriculture, and various forms of tourism. Beyond simply adding another transportation hub, this	EAP response: Glen Eric Huysamer has been registered as an IAP for the NEMA process CWA Response:

		project presents a unique opportunity to rethink the traditional airport model, transforming it into a dynamic center for economic growth, sustainability, and community engagement. Unlocking Economic Growth and Opportunity The introduction of a second international airport would act as a catalyst for regional economic expansion. Increased air traffic would not only enhance connectivity between the Western Cape and global markets but also create substantial employment opportunities in logistics, hospitality, retail, and support industries. The resulting economic ripple effect would strengthen local businesses, attract new investment, and foster a more resilient and diversified regional economy. A Strategic Hub for Agriculture and Trade The Western Cape is globally recognized for its premium agricultural products, particularly its wine and fresh produce. A strategically placed international airport, positioned closer to key agricultural regions, would streamline export logistics, reducing transit times and costs while improving access to international markets. This could significantly enhance the competitiveness of local producers, making South African goods more attractive to global buyers. Enhancing Tourism and Business Travel Tourism is a cornerstone of the Western Cape economy, and an additional airport could serve as a gateway to destinations beyond Cape Town. Improved access to the Cape Winelands, the West Coast, and the Garden Route would attract more high-value international visitors, boosting local businesses and hospitality ventures. Additionally, a well-designed airport catering to business travel could draw more conferences, trade expos, and corporate investment, strengthening the province's status as a business hub. A Community-Centric and Sustainable Approach This project presents a rare opportunity to design an airport that is more than just a transit point. By integrating green building principles, renewable energy solutions, and smart infrastructure, the facility could set new benchmarks for sustainable aviation. Additionally, incorporating community-driven spaces—such as public parks, artisan markets, and cultural showcases—would make the airport a destination in itself, fostering local engagement and economic participation beyond just air travel.	Thank you for taking the time to provide your comments. Due to the numerous requests for proposals to be considered, CWA has adopted a structured process to ensure every entity has a fair opportunity. Please visit our website and submit all of your information. The link can be found here: https://capewinelands.aero/opportunities/#business-at

		A Proposal for Innovative Pre-Planning Development I propose that developers consider specific elements in the pre-planning stage that would enhance the airport's sustainability, cost efficiency, and long-term economic viability. In particular, I suggest integrating a dual-purpose infrastructure model that supports both industrial and tourism-driven sectors, maximizing the airport's potential beyond conventional projections. A key component of this approach would be the development of cold storage facilities to support agricultural and food exports requiring refrigeration before shipment. By incorporating these facilities into the airport's design, export logistics would become more efficient, benefiting both local farmers and international trade partners. Additionally, the airport could be positioned as a hub for sports tourism, a largely untapped market in South Africa. By incorporating multipurpose sports and wellness facilities, the airport could attract high-performance athletes, sports teams, and health-conscious travelers seeking specialized medical and wellness tourism services. This, combined with leisure tourism, could drive new revenue streams and enhance the region's global appeal. By ensuring that the airport is not only a transit hub but also an economic and community focal point, we can foster a vibrant ecosystem that attracts both international business and local participation. This would lead to greater foot traffic, new business opportunities, and increased engagement with surrounding communities, making the project both sustainable and highly profitable. A Call for Forward-Thinking Development Careful strategic planning is crucial to realizing the full potential of this project. Collaboration between government agencies, private enterprises, and local communities of the greater Cape Town area will be essential in developing an airport that meets both immediate needs and future demands. The Western Cape has a rare opportunity to redefine what an airport can be—one that seamlessly integrates transportation, commerce, sustainability, and community enrichment. With visionary planning and execution, this project could set a global benchmark for innovative airport	

		development, positioning the region as a thriving international hub for generations to come. I would like to formally present a proposal to the airport's development team, as I believe my ideas could provide valuable insights. Some aspects may have been considered before, but I hope to introduce fresh perspectives that could refine and enhance the planning process. Who should I contact to submit this proposal?	
W321	Terene Nayager - NPower Cleaning Services (Pty) Ltd	n/a	EAP response: Terene Nayager has been registered as an IAP for the NEMA process
W322	André Siebert - Tighrope Integrated Services Group Pty Ltd	This airport will grow the economy and I am happy to hear of its intend to be carbon neutral or at least move in that direction. Our business would love to help you reach your goal.	EAP response: This comment is noted. André Siebert has been registered as an IAP for the NEMA process.
W323	Philip Adamson - Task Forge	By way of this message I would like to show my support for the development of the airport. With not only, the creation of jobs as well as the positive environmental factors, but the demand and reduction in traffic, it is a much needed addition to the area.	EAP response: This comment is noted. Philip Adamson has been registered as an IAP for the NEMA process
W324	Jaco Wiese	Looking forward to having an extra airport and hotel in the area.	EAP response: This comment is noted. Jaco Wiese has been registered as an IAP for the NEMA process
W325	Maryna Adamson - PA Projects	Good day, the development of the new Winelands Airport is set to significantly benefit the surrounding area by establishing a hub that will foster extensive growth across various markets. Thank you.	EAP response: This comment is noted. Maryna Adamson has been registered as an IAP for the NEMA process
W326	Claudia Klein mindworksa.com	It is a leading invitation to ask for support when I am interested at this point only to find out the possible affects the new airport may have on the area I live in. But I am interested to be kept informed. Thank you!	EAP response: Claudia Klein has been registered as an IAP for the NEMA process. CWA response:

			Thank you for your message and for expressing interest in staying informed about the Cape Winelands Airport project. You can find full details about the Environmental Impact Assessment (EIA) process via the link below: https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/ The current public participation period is open until the 13th May, and we welcome any input or questions you may have during this time.
W327	Laurika Engelbrecht	I believe the Cape Winelands airport will bring employment and new business opportunities for this area. This airport with it's rich history will also be given a face-lift and become an attraction for avid photographers and inspire young wanne be pilots.	EAP response: This comment is noted. Laurika Engelbrecht has been registered as an IAP for the NEMA process.
W328	Jacqueline Knowles	Very excited about the new airport	EAP response: This comment is noted. Jacqueline Knowles has been registered as an IAP for the NEMA process.
W329	Herman Stadler	I fully support the development of the Cape Winelands Airport. This project will bring great benefits to the northern suburbs of Cape Town, as well as the broader Winelands and inland regions. The location is much more convenient for many residents and businesses in these areas, and it offers an excellent alternative to Cape Town International Airport. Apart from easing congestion, the airport will boost the local economy through job creation, tourism, and improved access for both local and international visitors. It's a smart step forward in improving regional connectivity and supporting long-term growth. Looking forward to seeing this project come to life!	EAP response: This comment is noted. Herman Stadler has been registered as an IAP for the NEMA process.
W330	Jacques Cilliers	I fully support the new development and would like to assist in any way to ensure a successful development.	EAP response: This comment is noted. Jacques Cilliers has been registered as an IAP for the NEMA process.
W331	Anne Janeke	It is a very positive and exciting project which is excellent for the Western Cape and the whole of South Africa	EAP response: This comment is noted. Anne Janeke has been registered as an IAP for the NEMA process.
W332	Desmond Davids	I would like to add my support for this project as this will create many jobs. I also live close to the area where this airport will be built.	EAP response: This comment is noted. Desmond Davids has been registered as an IAP for the NEMA process.

W333	Rodney Potter - Matmone Construction	Besides been in the construction industry, mainly renovations and residential and commercial, I am a aircraft enthusiast and a RC pilot. I fully support the initiative of another main airport in the Western Cape and mainly the Winelands.	EAP response: This comment is noted. Rodney Potter has been registered as an IAP for the NEMA process.
W334	Selvyn Adams	This is a great initiative which I believe will bring sustainable job opportunities to the Greater Cape Winelands.	EAP response: This comment is noted. Selvyn Adams has been registered as an IAP for the NEMA process.
W335	Chris Joubert - Bivos	I firmly believe that the motivation for this airport is solid, and I especially support the aim to follow a clean energy strategy. Hopefully this will include clean, safe batteries as well - i.e. NOT lithium-based in any way. :-).	EAP response: This comment is noted. Chris Joubert has been registered as an IAP for the NEMA process. Response from specialist: While we have previously discussed and priced lead-acid batteries, these are far from ideal, for the following reasons: - They cannot be used for high-cycle applications as they do not last long enough. - The PV systems required for airport operations will require energy storage to provide the 24/7 power green source required. - CWA would be changing batteries costing Millions of Rands likely annually. - The volumetric storage of these batteries compared to Li-Ion batteries is $\geq 2^*$ - If we cannot use Li-Ion batteries, the choices for energy storage become limited and even more expensive. I easily understand the concerns regarding the fire risks associated with Li-Ion batteries; these are well known and widely documented. The frequent online videos showing fires caused by these batteries usually relates to low-cost batteries and importantly their low cost battery charging systems, which can overheat and reach runaway temperatures, leading to fires starting at the chargers or as a result of overcharging the batteries – lithium is combustible and once a fire is established, unless proper electrical isolation, flame suppression and overtemperature is achieved, leads to fires. This phenomenon is common for e-bikes and e-scooters, hover boards and less

			commonly for electric cars. The designers of the battery storage systems utilizing this technology fully understand this, and the following mitigation measures are put in place: f. The batteries are housed in field mounted containerised enclosures. These can be located well away from buildings, plant, services and systems such that in the event of a fire, the risk of fire spread is limited. g. The containerised units are continuously monitored for temperature rise and smoke and fitted with self-contained automatic fire extinguishing systems. h. The containerised internal battery packs are continuously temperature monitored, and the charging of the batteries can be controlled and isolated in the event of “out of envelope” temperature events. i. The battery charging current is carefully regulated in conjunction with the status and condition of the battery pack, such that overcharging and overtemperature conditions are effectively eliminated/reduced significantly. To ensure that CWA will comply with the Green Energy Standards and Requirements, the use of the Li-Ion technology is (likely) the only feasible energy storage solution, based on the following: j. The Li-Ion battery life cycle capability will ensure many years of operation (likely ≥ 5-years). k. The energy storage density of the batteries is high. l. The recyclability of the batteries is high m. The relative cost has been trending down improving their financial viability n. The fire risks can be managed and mitigated.

W336	Francois De Bruyn	I support this Airport, I just hope you make provision for AVGeeks like myself to have a dedicated place for "plane spotting"	EAP response: This comment is noted. Francois De Bruyn has been registered as an IAP for the NEMA process.
W337	Kim Roberts - Mise-en-place Hospitality Solutions	I support	EAP response: This comment is noted. Kim Roberts has been registered as an IAP for the NEMA process.
W338	Brian Craig - The Fund Capital Advisors Pty Ltd	The CWA is an essential smart/green infrastructure project for the W Cape economy and must be successful for the region to realise its potential.	EAP response: This comment is noted. Brian Craig has been registered as an IAP for the NEMA process.
W339	Marius Bothma - Giant Hyper	We are optimistic and want to be part of the growth.	EAP response: This comment is noted. Marius Bothma has been registered as an IAP for the NEMA process.
W340	Jeremy Lucas - Le Chaussy Building Contractor Pty Ltd	This is great for our District. More tourist and more business opportunities for locals and wel taking off the pressure from Cape Town International Airport. Also less traffic on that side, more traffic and feet in the Capewinlands District	EAP response: This comment is noted. Jeremy Lucas has been registered as an IAP for the NEMA process.
W341	Alton Garcia	As a local resident of Mikpunt I am keen on information about the development of the airport as well as business opportunities that may be offered.	EAP response: This comment is noted. Alton Garcia has been registered as an IAP for the NEMA process.
W342	Thinus Jordaan	Great need for this facility/hub	EAP response: This comment is noted. Thinus Jordaan has been registered as an IAP for the NEMA process.
W343	Graeme Marshall	I am interested in new opportunities related to the Cape Winelands Airport	EAP response: This comment is noted. Graeme Marshall has been registered as an IAP for the NEMA process.
W344	Christopher Jonsson - GT Aviation (Pty) Ltd	I'm keen to invest in a hangar in the airport, primarily for helicopters. To this end I need to make contact with the relevant person. Please would you be so kind as pass this email enquiry on appropriately as a matter of urgency. Kind Regards Chris Jonsson [REDACTED]	EAP response: This comment is noted. Christopher Jonsson has been registered as an IAP for the NEMA process.

W345	Faizah Carolissen - IFB Transport and Tours	Let us all support the cape Winelands airport to build a strong structure for businesses to grow, employment to rise, to attract tourist and hopefully this can have a positive outlook in the near future!	EAP response: This comment is noted. Faizah Carolissen has been registered as an IAP for the NEMA process.

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Appendices

Appendix A (C357) – Email communication attached to Comment 357

Appendix B (C375)– Heritage Western Cape Final Comment

Appendix C (C403) – EAP & Specialist responses to DEADP's Offset Comments

Appendix D (C410) – Attachment provided as part of Comment 410

Appendix E (C411) - Attachments provided as part of Comment 411

Appendix F (C413) - Attachment provided as part of Comment 413

CONFIDENTIAL

olivia@phsconsulting.co.za

To:

Michael Veldman; deon@capewinelands.aero

Subject:

RE: VERNi Speciality Construction Products - Cape Winelands Project

From:

Michael Veldman

Sent:

Tuesday, 18 June 2024 13:05

To:

deon@capewinelands.aero

Subject:

VERNi Speciality Construction Products - Cape Winelands Project

Good day, Mr. Cloete,

I hope you have had a successful week so far. It must be exciting times for you and the team on the Cape Winelands Project.

I would like to know if we can set up a meeting with all relevant parties to introduce our company and showcase what we can offer.

VERNi can assist with technical engineering for both Brownfield and Greenfield projects, ensuring the correct concrete repair materials, joint bandaging systems, concrete protection, and waterproofing systems are used for lifelong peace of mind. From the design stage to a complete project overview, VERNi's 23 years of proven performance will ensure the concrete will not corrode or leak.

We specialize in the following:

- General Waterproofing
- Concrete Waterproofing, Protection, Rehabilitation (no maintenance required)
- Concrete Repairs
- Epoxy/PU/Decorative Cement Flooring

Please let me know your thoughts and if you think it would be a good idea to introduce our company for this project.

I have attached some details for your perusal.

Kind regards,

Michael Veldman

Business Development Manager



speciality construction products





Official Distributor:


CONCRETE
WATERPROOFING
SYSTEMS


SACAS
OHSAS 18001:2007

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Acid Proofing / Corrosion Protection (coatings, screeds, FRP linings, acid bricks, & acid tiling) , Epoxy/ PU/ Decorative Flooring / FRP Tank Linings (high chemical resistance), Concrete Repairs (rapid hardening), Structural Reinforcing (carbon fibre), Construction Chemicals (non-shrink grouts, primers, repair mortars), Concrete Waterproofing (crystal growth), Expansion Joint Bandaging & Sealing (water retaining structures)

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Please note that the recipient must scan this e-mail and any attached files for viruses and the more we do everything possible to protect information from viruses, we do not accept any liability of whatever nature for any loss, liability, damage or expense resulting directly or indirectly from the access and/or downloading of any files which are attached to this e-mail message.

Our Ref: HM / CAPE TOWN METROPOLITAN / DURBANVILLE/ MULTIPLE FARM PORTIONS
Case No: HWC23101215SB1102
Enquiries: Stephanie Barnardt
E-mail: Stephanie.Barnardt@westerncape.gov.za
Tel: 021 829 3315



Consultant: Henry Aikman

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

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)

The matter above has reference.

This matter was discussed at the Impact Assessment Committee (IACOM) held on 22 January 2025.

FINAL COMMENT:

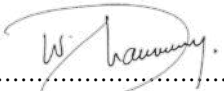
The Committee has resolved to endorse the Heritage Impact Assessment (HIA), dated October 2024, and prepared by Aikman Associates, as having met the provision of Section 38(3) of the National Heritage Resources Act (NHRA), with specific reference to the following recommendations on page 29:

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.
2. Further visual specialist input will be needed at the level of the Land Use Planning application and the future SDP planning phases.

And including mitigation measures in the VIA prepared by Filia Visual dated September 2024 on page 113 to 129.

HWC reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number.


Waseefa Dhansay
Assistant Director: Professional Services



www.westerncape.gov.za/cas

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• **Tel:** +27 (0)21 483 5959 • **E-mail:** ceoheritage@westerncape.gov.za

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Idilesi yendawo: kumgangatho 3, kwisakhiwo iprotea Assurance, Greenmarket Square, eKapa, 8000 • **Idilesi yeposi:** Inombolo yebhokisi yeposi 1665, eKapa, 8000 • **Iinombolo zomnxeba:** +27 (0)21 483 5959 • **Idilesi ye-imeyile:** ceoheritage@westerncape.gov.za

Appendix C (C403)

DEA&DP comment	EAP response	Specialist response
2.1.1.1. It is detailed in the abovementioned Biodiversity Offset Report that “the applicant will submit the signed Landowner agreement to secure the priority site with the Final EIR”. This information must therefore be provided as such.	The signed landowner agreement will be submitted with the final EIAR to DEA&DP.	n/a
2.1.1.2 In terms of applying condition modifiers to the basic offset ratios the reduction of offset ratios below 50% of the basic ratio based on an argument of the condition of the ecosystem on the impacted site being degraded cannot be agreed upon. This principle is in line with the current guidance captured in the 2015 Western Cape Guideline on Biodiversity Offsets. Likewise, the Western Cape Guideline also only allows for condition modifiers to be used to motivate for a reduction in the offset ratio for sites considered to be heavily degraded, but in this instance the ratio is being reduced for moderate condition sites as well. Any reductions in the offset ratio based on a site being in moderate condition is not acceptable, in principle, unless there are valid reasons, otherwise a 1:30 ratio should applied. Hence, such reasons must be provided accordingly.	n/a	We acknowledge and appreciate the Department’s comment in section 2.1.1.2 regarding the application of condition modifiers in determining appropriate biodiversity offset ratios. We understand that the concern raised relates specifically to the reduction of offset ratios "below 50%" of the standard (gazetted) ratio, particularly where impacted ecosystems are not considered “heavily degraded.” 1. DEADP’s comment refers expressly to reductions in offset ratios below 50% of the basic ratio, which, in the case of Critically Endangered (CR) ecosystems, equates to less than 15:1 (i.e., 50% of 30:1). This principle is clearly understood and has been respected in the offset calculations. We confirm that: All likely impact areas of remnant vegetation were mapped generously – the actual remnant areas are less than shown in the table. No reduction below 50% of the gazetted ratio was applied to areas classified as being in
2.1.1.3. Further to the above, clarification must be provided on whether the proposed offset	n/a	

site contains enough good condition ecosystem to cater for an increased offset ratio.		moderate or moderate-to-poor condition. Only those areas that were explicitly assessed as poor to very poor in ecological condition were assigned modifiers resulting in final ratios below 50%. These remnants have very low prognosis for persisting and almost no opportunity for effective restoration. 2. Use of Condition Modifiers Was Conservative and Justified: The Northern Silcrete Remnant, classified as moderate condition, was assigned a 66% modifier, yielding a final offset ratio of 20:1 — well above the 50% threshold. This site is heavily grazed and shows substantial impact from hoof action and a substantial reduction in structure and function. It cannot be linked to any similar ecosystem remnant to maintain long-term function and species diversity maintenance. The Mown Grasslands, assessed as poor to moderate, were assigned a 50% modifier, resulting in a final 15:1 ratio — exactly at the threshold outlined in DEADP's comment. Only deeply degraded patches, such as residual Renosterveld fragments within or overlapping the runway layout, being heavily impacted by invasive aliens and prior evidence of earthworks/ploughing were assessed as poor to very poor and assigned a 33% modifier, producing a final 10:1 ratio. These were determined, using professional ecological judgement, to have crossed the threshold of

		functional collapse — with minimal ecological value or restoration potential. The final comparison of ratios is provided in Table 1 of the Offset Report. The specialist stands by these proposals. 3. Principled Application Consistent with National and Provincial Guidelines: As outlined in the DFFE 2023 National Biodiversity Offset Guideline, condition-based adjustments are permissible when grounded in ecological evidence. While the Western Cape Guideline (2015) does call for caution, it similarly permits modifiers for heavily degraded areas if adequately motivated. The condition assessments used here were: • Conservatively applied based on site visits and botanical specialist findings; • Aligned with SANBI and DEADP precedents on interpreting ecological viability and persistence; • Intended to ensure offset effort reflects ecological reality, not a rigid numerical standard. • The candidate offset sites are in far better condition than the impact sites, further supporting the use of the proposed exchange rules. 4. Offset Outcome is Substantial, Defensible, and Aligned with Good Practice: The total required offset of 77 hectares was calculated using conservative metrics, incorporates specialist input, and will be implemented through:

		• Binding landowner agreements; • EMPr-based integration into long-term management; • An endowment-backed fallback to the Endangered Wildlife Trust in the event of non-compliance. • This ensures that real biodiversity value is secured, regardless of technical debate over numeric thresholds. • An additional area of approx. 30 ha is available on the preferred site to cater for any perceived deficiency. Therefore, in response to 2.1.1.3 on Offset site containing enough good condition ecosystem to cater for an increased ratio, the answer is yes – although an increased ratio is still not justified. We therefore respectfully submit that: • DEADP's concern about reductions below 50% is addressed and resolved, as no such reductions were applied outside the limited, heavily degraded areas; • The application of the 66% modifier for moderate condition was cautious and scientifically defensible; • The broader offset proposal delivers a credible and meaningful conservation outcome in line with both provincial and national guidance.
2.1.1.4. Confirmation must be provided on whether the sites requiring offset are inside or outside the Proclaimed Urban Edge of the City	n/a	The offset specialists' understanding is that all the impact sites except the northern most one of 1,7ha, (66% modifier, 20:1 Final ratio) sit

of Cape Town, as this affects arguments and motivations around reducing offset ratios. Depending on the confirmation provided, you must provide updated arguments and motivations around reducing offset ratios, where so required.		within the urban edge. This would provide further rationale for reducing the ratio – if authorities needed it.
2.1.1.5. It is unclear whether the proposed R8 million penalty is to be used only for managing the offset, or also for securing the offset (via declaration as Nature Reserve/Protected Environment). This information must therefore be made known.	n/a	The R8 million penalty is to be used for management as clearly stipulated in the second bullet of the final component of the proposed offset condition of authorisation, viz: “In addition to any other administrative penalties that may be determined, a sum of R8 million becomes immediately payable to the Endangered Wildlife Trust, to establish a, or augment an existing, fund for the management of the offset site and adjacent priority conserved areas in the Klipheuwel Corridor not currently in City ownership”. The Biodiversity Offset Report will not be amended as clarification on this comment becomes available to IAPs as part of the C&R responses.
2.1.1.6. As the proposed offset represents reactive stewardship (land ownership will not be transferred), the biodiversity offset report should be amended to remove any responsibility or cost for implementation being assigned to the City of Cape Town. This specifically relates to a conservation servitude being registered in favour of the City of Cape Town, should the applicant be unable to	n/a	Even though the preferred site of Hercules Pilaar would now be considered a “reactive” stewardship site, the CoCT would still play an important role in adjacent conservation endeavours. Although the CoCT’s biodiversity management branch had offered to co-fund certain management interventions, especially where these would require city cooperation (prescribed/controlled burning) or would apply

implement the offset, and the City of Cape Town contributing to the cost of ecological burns.		to multiple adjoining sites and not just the offset site, any role or support from CoCT has not been relied on or included in the calculations for the management. If any budget item is insufficient, the proposed metric/level of effort can be reduced accordingly, without jeopardising biodiversity persistence on the site. To note, however, that the CoCT will still be required by its mandate to participate in certain management activities and be required to sign off on management and operational plans prior to these being implemented. These costs are inappropriate to place at the door of the applicant. The above responses to points 2.1.1.2 – 2.1.1.6 were endorsed by the Botanist Nick Helme. The Biodiversity Offset report will not be amended.
2.1.2. Given the above. it is also requested that CapeNature provides comments on the latest Biodiversity Offset Report (dated February 2025 and compiled by Mr. Mark Botha) as well the questions raised above and the responses provided by the Biodiversity Offset Specialist to such questions.	CN will be requested to provide comment on the latest Biodiversity Offset Report (dated February 2025 and compiled by Mr. Mark Botha), and the responses to the above DEA&DP questions will be provided to CN as part of the request.	n/a
2.1.3. It is indicated in the Plant Species Impact Assessment Report (dated 10 February	n/a	The operational phase botanical impacts are assessed as Neutral to Low negative after mitigation, and the overall cumulative

2025 and compiled by Mr. N.A. Helme of Nick Helme Botanical Surveys) in certain instances that the operational and cumulative impacts will be 'neutral' after mitigation. The said specialist professional is therefore requested to provide further explanations on what is implied/meant by the identified impacts having a 'neutral' significance rating after mitigation.		ecological impacts of the proposed development at the local scale are likely to be Low to Medium negative prior to mitigation, given the fairly small area of High or Very High sensitivity vegetation to be impacted (<3ha). After mitigation, and with implementation of an appropriate offset, and on-site management of the remaining conservation worthy areas, this could be reduced to Neutral or even Low positive.” To clarify, this Neutral or even a Low positive botanical impact is deemed likely to come about with appropriate ecological management of the Very High sensitivity area on the site (alien vegetation and fire management – neither of which are part of the No Go scenario), and together with the significant biodiversity offset, which will conserve 77ha of currently unprotected priority habitat of much better quality than most of what will be lost on site, could result in a net Neutral to Low positive impact for conservation in the region. Neutral in this case means that the negative impact of loss of some sensitive habitat and rare species on site is balanced by the gains due to the management of the remaining sensitive areas and the gain due to the Biodiversity Offset.

ENVIRONMENTAL IMPACT REPORT ON POULTRY HEALTH**AS REQUESTED BY COUNTY FAIR CHICKENS, KARNEMELKSVLEI, DISTRICT OF PAARL.****COMPILED BY PROF. DANIEL M BARRY, BVSc, MSc, PhD, MRCVS.****ABSTRACT**

An organic recycling processing and composting site could be a haven for scavenging and migrating birds like crows, insects like flies and blowflies, and rodents, if certain mitigating and preventative measures are not instituted and followed. These animal disease vectors can play a major role in the dissemination of pathogenic bacteria, viruses and other microorganisms from the composting site to the broiler and layer houses. If the H5N2 virus spreads to the poultry industry from carriers such as migrating and scavenging birds found in composting sites, it can have a major effects on the meat producing industry in South Africa, as was the case in a turkey farm in the UK some years ago. As recently as last month between 11 and 21 January 2015 seven outbreaks of the highly pathogenic H5N1 Avian Influenza virus were reported in the central and northern parts of Nigeria. It involved almost 140 000 birds on 21 commercial broiler farms. The pathogenic H5N1 virus was possibly spread by migrating birds to Nigeria, as is the case in most unrelated spreading of the virus. The H5 and H7 subtypes can be introduced to poultry flocks in the low pathogenic form, where they can multiply and mutate to the highly pathogenic H5 and H7 forms. If and when the H5N1 or H5N2 virus enters the poultry chain, it can cause major losses to the protein production industry in South Africa. The presence of almost a million broiler chickens of County Fair within 800 meters from the proposed Okran 38 (Pty) Ltd Organic Processing and Composting Facility causes a real health threat to the broilers and layers of County Fair Chickens.

It is therefore advised that the following preventative measures be implemented into the developmental operating structures for the Okran 38 (Pty) Ltd Recycling Processing and Composting Facility:

1. All protein material originating from animal and poultry abattoirs be macerated and then sterilized by heating to at least 100 degrees Centigrade for not less than 60 minutes. This will prevent microorganisms from contaminated and condemned protein-like material entering the facility with the possible dissemination to the County Fair Chicken houses. Pasteurization will not eliminate the pathogenic spore forms of *Clostridia* bacteria.

2. No hair, wool, bones, feathers or animal hoofs enter the Okran (Pty) Ltd Recycling Processing and Composting Facility, as proper sterilization during short periods of time as above is not achievable, and needs much more stringent measures.
3. The open windrows be placed as far away from the County Fair chicken houses as possible (option 3). Insects can detect rotten and decaying protein material as far as 2 km away, be attracted to it and start breeding in it. From their breeding ground they can cover distances of up to 2 km per day and spread microorganisms on their bodies over vast distances. The present open windrows are probably less than 800 m from the Country Fair Broiler Houses as can be seen in the picture below which was taken from the County Fair broiler houses at Karnemelksvlei.



4. All polluted air escaping from the biodigester and indoor-enclosed composting site be filtered making it completely odourless to prevent insect attraction and possible air pollutants disseminated by prevailing winds (south-east and east) to the chicken houses. The air filters should be regularly checked for efficiency.
5. Regular insect counts should be done on the open windrows.

6. If insect multiplication in the open windrows is detected at any stage, the windrows should be sprayed with a long-acting pyrethroid insecticide to prevent further increase in insect numbers.
7. "Wet compost" from the indoor-enclosed composting facility should not contain more than 50% of water when transported to the outside windrows to prevent leakage of pollutants into the soil and thereby contaminating the subsurface groundwater used by County Fair.
8. No sludge, food waste, abattoir waste, fruits and vegetables, or household organic waste should be deposited primarily onto the open windrows as the decomposing process will attract insects and scavenging birds and serve as breeding substrates for flies and blowflies.

INTRODUCTION

The proposed Okran 38 (Pty) Ltd Organic Processing and Composting Facility on farm at Corona No. 480, Paarl will handle and digest by anaerobic (biodigester) as well as aerobic digestion (indoor-enclosed composting and outside windrows) the following waste materials for the production of organic compost and biogas:

A. Open Windrow composting:	Green waste Fruits and vegetables Paper pulp Industrial wine Industrial beverages waste
B. Indoor-enclosed composting: (Aerobic digestion)	Green waste Fruit and vegetables Paper pulp Industrial wine and beverages Sewage sludge Abattoir waste of sheep, goat, cattle, poultry and pig origin Food and factory waste of undisclosed origin Fish waste and Household wet organic waste
C. Biodigester with anaerobic digestion:	The same materials as in enclosed composting.

A total amount of about 23 000 cubic meter (metric tons) of material will be handled on the premises every month. The biogas (mostly methane) produced in the biodigester will be used to generate electricity for the farm with its composting facility. The effluent water will be collected and sprayed directly onto the soil of Corona farm. The dry compost will be used to replace the topsoil of Corona Farm.

GENERAL POULTRY HEALTH ASSESSMENT

The following animals, insects and birds can act as vectors (disease transmitters) of microorganisms and ectoparasites from the Okran 38 (Pty) Ltd Organic Recycling Processing and Composting Facility to the neighbouring Count Fair chicken houses and should be discouraged to enter the open windrows and use it as breeding ground:

A. Rats and other rodents:

One female rat can, under ideal conditions, produce up to 30 adult female rats per annum that each also has the potential to produce another 30 females each. Rats and mice feed twice a day, shortly after dark and just before dawn. They can migrate up to 2 or 3 km at night to search for abundance of water, food and shelter. Rats are prolific breeders and can start reproduction as early as 3 to 4 months of age, and will continue until about 18 months of age. Gestation is 21 to 25 days. The young are weaned at 3 weeks old, often just before the arrival of another litter. A female can breed as soon as 1 day after giving birth. If fertilization does not occur, she will come into heat about every 5 days. A female averages six litters per year, with nine young per litter. However, under ideal conditions, litters may contain 20 young, and 14 litters have been recorded during one year. The babies from one pair of rats would be more than 3.5 million in 3 years under ideal conditions and ignoring the death rate. In natural conditions, however, many die, but in a year, as many as 60 to 70 offspring from one female may mature. Breeding is greatest in spring and fall, drops some in summer, and drops substantially in winter.

Rats and mice can pose a major threat to poultry farms in spreading microorganisms such as *Salmonella* and *E. coli* from compost windrows to chicken houses. They also transport and host ectoparasites, especially mites. Mites live temporarily on rats and mice in their nests and burrows and can, following treatment of the chicken house and poultry for mites, quickly re-invest the premises with mites. Rats can transport 18 different kinds of mites, lice, fleas and ticks. Poultry houses act as ideal attractions for rodents and their survival and multiplication, as they have an abundance of food and water. The uncontrolled breeding of rats in optimal conditions of shelter, water and food, like a neighbouring compost site, poses great danger for animal agriculture and human health. As rodents can migrate for 2 to 3 km during the night, a neighbouring compost site to a poultry operation is not advisable. No odorous waste material should therefore be used

in the open windrows that will attract rodents. Only pathogenic-free material should be used in these open windrows.

B. Scavenger birds:

Birds will be attracted by proteinaceous material, worms, insects and other proteins in open composting windrows. From there they can spread pathological microorganisms over great distances. Open windrows should therefore not contain any undigested abattoir material, human sludge from sewerage plants, food waste, fruits and vegetables or household organic waste. Migrating birds can infest open windrows with pathogenic microorganisms like Avian Influenza virus, bacteria like Salmonella, E. coli, and ectoparasites like ticks, fleas and mites, some of them unfamiliar to South Africa. The spreading of these pathogens from the windrows to the County Fair chicken houses is over a short distance of less than 1 km.

C. Insects, flies and blowflies

Blowflies have been proven to disseminate the highly pathogenic avian influenza virus. Avian flu due to the H5N2 virus caused havoc in the South African bird population since it was diagnosed in South Africa a number of years ago, especially during the past numbers of years in the ostrich industry. A total of more than 38 000 ostriches were culled since the beginning of 2011, and the disease caused a staggering loss of almost R1bn to the industry. It presently costs the breeder about R2 200 to raise an ostrich to a 95 to 100 kg slaughter weight, for which the breeder can expect an income for the same ostrich of only about R1 400, due to an embargo on the export of ostrich meat.

Blowflies can smell carrion over distances of 1.6 km and will be attracted by decomposing carcass material or organs of animal origin. The adult female blowfly will lay about 250 eggs in the decomposing material, and with a lifecycle of only 2 weeks, blowfly and maggot number will increase exponentially if no action is taken. Many insect species use decomposing organic (plant and animal) material as breeding grounds for laying their eggs. The blowflies and other insects, on their part, then spread microorganisms attached to their body hair over distances as far as 2 km every day, especially when winds are blowing. Outside open windrows should therefore not contain any smelly decomposing material that will attract insects like flies and blowflies. Regular monthly insect counts should be done on the open windrows to evaluate the increase in insect numbers, and

the windrows then sprayed with a long-acting pyrethroid insecticide to control insect numbers.

MITIGATING CONTROL MEASURES TO BE TAKEN

To minimize the risk of disease and microorganism spread from the proposed Okran 38 (Pty) Ltd Organic Processing and Composting Facility on farm Corona No. 480, Paarl to the County Fair broiler and layer houses of less than 1 km away, the following mitigating steps are proposed to be implemented:

1. All protein and fat material originating from animal and poultry abattoirs should be minced into smaller pieces to allow the heat to penetrate the inside material. The macerated material should then be sterilized by heating to at least 100 degrees Centigrade under pressure for not less than 60 minutes. This will prevent microorganisms from possibly contaminated and condemned protein-like material entering the facility with the possible dissemination to the open air windrows and from there to the County Fair chicken houses. Pasteurization alone will not eliminate the pathogenic spore forms of some bacteria, for example *Clostridium perfringens* and other spore-forming bacteria present in the gut and organs of animals.
2. Hair, wool, bones, feathers and animal hoofs need much more prolonged and stringent disinfecting methods before they are sterile. If these material therefore reach the open windrows the chances are that they might contaminate the environment with spreading to the neighbouring environment, including the County Fair chicken houses.
3. The open windrows should be located as far away from the County Fair chicken houses as possible (option 3 in the proposal). Insects can detect rotten and decaying protein material as far as 1.6 km away, be attracted to it and start breeding in it. From their breeding ground they can cover distances of up to 2 km per day and spread microorganisms on their bodies over vast distances. The furthest possible distance between the open windrows and the County Fair chicken houses should therefore be implemented to minimize the spread of microorganisms by wind or insects from the composting open windrows to the broiler houses.
4. During anaerobic as well as aerobic decomposition by bacteria and protozoa, mixtures of gases are formed that are not just toxic to the environment, but also attracts insects like blowflies. All polluted air escaping from the biodigester and indoor-enclosed composting site should therefore be filtered making it totally odourless to prevent insect attraction

- and possible air pollutants disseminated by prevailing winds (south-east and east) to the chicken houses. These filters should be regularly checked for efficiency and proficiency.
5. To minimize the number of insects breeding in the windrows, regular insect counts should be done on a monthly basis. Random samples at different depths and from different rows should be collected and the insects, their eggs and maggots should be counted under a stereo microscope.
 6. Insects can multiply at an astronomical rate. A single blowfly female can reproduce up to thousands of maggots within 4 weeks. If insect multiplication in the open windrows is detected at any stage, the windrows should be sprayed with a long-acting pyrethroid insecticide to prevent further increase in insect numbers.
 7. Possible contaminated effluent present in "wet compost" after incomplete aerobic digestion of contaminated material within the indoor-enclosed composting area may contain a high percentage of toxic and pathogenic microorganisms. "Wet compost" from the indoor-enclosed composting facility should therefore not contain more than 50% of water when transported to the outside windrows to prevent leakage of polluted effluent into the soil and thereby contaminating the subsurface groundwater used by County Fair.
 8. Decomposing fruit, vegetables, meat and animal organs attracts insects and other scavengers such as insects, rodents and birds. No sludge, fish waste, abattoir waste, fruits and vegetables, or household organic waste should be deposited directly onto the open windrows as the decomposing process will attract insects and scavenging birds and rodents and serve as breeding substrates for flies and blowflies.

LIST OF REFERENCES

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From: Mark Wilkinson <mark@capewinelands.aero>

Sent: 25 April 2025 04:00 PM

To: Mari De Villiers

Cc: Karla Burge

Subject: RE: EIA for the proposed Bella Riva mixed-use development near Fisantekraal: Invite to comment on Pre-application Draft Scoping Report

Dear Mari,

Trust all is well your side.

We would like to add further comment to the Bella Riva Pre-application after now absorbing more of the available information and Draft Scoping Report etc:

The Cape Winelands Airport (CWA) team welcomes the opportunity to comment on the Bella Riva Mixed-Use Development Pre-Application Scoping Report and expresses strong support for the proposed development. We commend the Bella Riva project team for taking proactive steps to ensure alignment with CWA's operational requirements and long-term development objectives.

We are particularly supportive of the developer's commitment to a flexible Site Development Plan (SDP), which responds to CWA's adjacent airport context. The proposal to utilize Phase 3 of the Bella Riva development for industrial purposes is complementary to CWA's anticipated noise zones and adjacent land uses such as logistics and light industrial activities. As it relates to roads, we would like to note the following in-principle agreements following positive engagements with the Bella Riva Developer:

1. The latest Bella Riva SDP has been updated to include the amended realignment of the East-West link road between Klipheuwel Road and the future Lucullus Street. This amendment was agreed to relocate the link road access with 91m to the south to accommodate the future Cape Winelands Airport without major implications for Bella Riva.
2. The approval of the realignment of the east-west link road will be the responsibility of the Bella Riva Developer.
3. The future alignment of the Lucullus Street northern extension is not correct as it traverses the CWA property. It is however noted that Portion 2 of Farm 123 is not included in the EIA. The final alignment of Lucullus in this vicinity must be agreed to as the horizontal alignment will encroach onto Portion 2 of Farm 123.
4. A 40m road reserve is required for the Lucullus Road future extension. The road reserve needs to be shared between the adjoining properties of Bella Riva and CWA.
5. A roundabout is proposed at the intersection of the future East-West road and Lucullus Street. The splays to accommodate this roundabout must be indicated on the cadastral information of Bella Riva.
6. The design of the East-West road must include the possibility of public transport infrastructure (e.g. Public transport dedicated lanes, embayments, stops, intersection priority) as this route is one of two main accesses into the CWA.
7. It is not clear how the existing access road (Mellish Road) and its 13m road reserve will accommodate the Bella Riva traffic.

From a civil aviation and safety perspective, it appears that the Bella Riva development will not negatively affect aerodrome operations or pose any risks to aircraft safety, subject to final confirmation from the Civil Aviation Authority (CAA). The development will not penetrate CWA's Obstacle Limitation Surfaces (OLS), and we note the comment in the Bella Riva Revised Site Sensitivity Verification Report that the site "will not have any buildings higher than 45m," although it is unlikely that such heights will be reached. Furthermore, we acknowledge from the Site Sensitivity Report that

underground infrastructure, such as pipelines, will be located within existing road servitudes and will not interfere with any future airport infrastructure.

CWA supports the Bella Riva development as a well-considered, adaptable, and forward-looking project. The development demonstrates good planning principles and contributes positively to the economic and spatial transformation of the area. We look forward to ongoing collaboration as both projects progress.

Kind regards,

Mark Wilkinson CA(SA)
Director

Tel:
Cell:
Web: www.capewinelands.aero

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From: Mark Wilkinson <mark@capewinelands.aero>
Sent: Monday, March 24, 2025 3:55 PM
To: Mari De Villier
Subject: RE: EIA for the proposed Bella Riva mixed-use development near Fisantekraal: Invite to comment on Pre-application Draft Scoping Report

Dear Mari,

Please register me as an I&AP for the above referenced project.

I represent Cape Winelands Airport (CWA) and our specific interest for now is in the alignment of your main east-west road (extending west from the R302) which should be aligned such that it ties in to the main future access point into the airport.

Postal details as follows:

PO Box 12449
Mill Street
Gardens
8010

Regards,

Mark Wilkinson CA(SA)
Director

Tel:
Cell:
Web: www.capewinelands.aero

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Annexure B

		6. Please direct any enquiries to Gunther Frantz should you require clarity on the comments provided. The Department reserves the right to revise or withdraw comments or request further information based on any information received.	6. Noted
330	Karla Burger – ELCO Property Development	Email dated 13 December 2024: 1. The below has reference. Please see attached the following for your perusal: • Comments Letter • Power of Attorney • Resolution Kindly acknowledge that this has been received. Please note the comments letter is outlined below while the remaining documents provided are attached as Appendix D (C330).	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. Email response provided 14 December 2024: 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.
		Letter received via email dated 13 December 2024:	

		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.

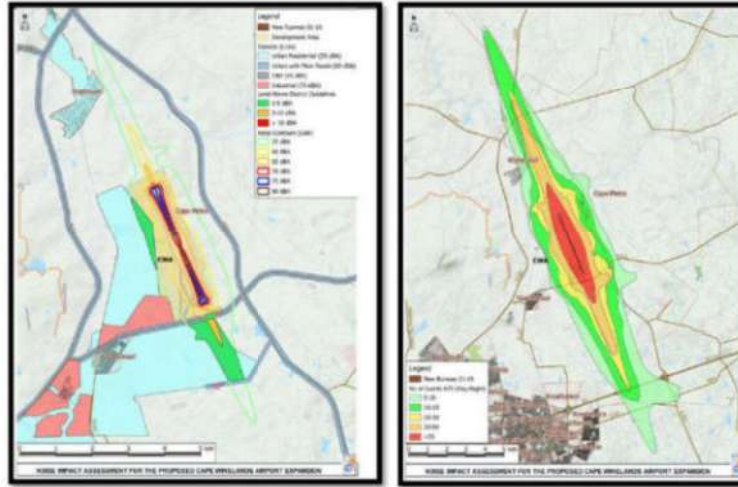


Fig. 3: Noise Rating Level Contours; Fig. 4: N70 Contours

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.

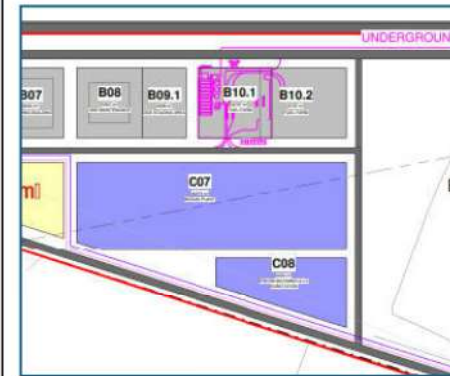
Furthermore, we request detailed information regarding the environmental safety of positioning the bioreactor in close proximity to areas of significant human activity. Considering that bioreactors utilize animal waste products, their presence in the middle of a human activity hub raises serious health, 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: Please see attached comments as per your public participation process.	Email response provided 14 December 2024: 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: 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.	The background information provided and comment is noted.

**POWER OF ATTORNEY
(REGISTERED OWNER'S CONSENT FORM)**

I, JOHAN MOMSEN SMIT () 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

BILLTRADE 104 (Pty) Ltd

REGISTRATION No.

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:-

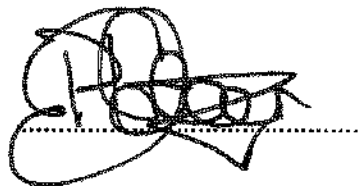
That JOHAN MOMSEN SMIT (IE _____) be, and is hereby, authorised to sign any and all such documents required for the comment on the above mentioned application process as well as any other documents required for Council or any other authority submissions in this regard.

DIRECTOR

SIGNATURE

DATE

Mr PR Eksteen

A handwritten signature in black ink, appearing to be 'J. Eksteen', written over a dotted line.

8/10/24 2024

BUNKER HILLS INVESTMENTS 311 (Pty) Ltd

REGISTRATION No. _____ **(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:-

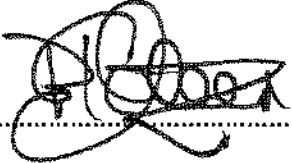
That JOHAN MOMSEN SMIT (ID _____) be, and is hereby, authorised to sign any and all such documents required for the comment on the above mentioned application process as well as any other documents required for Council or any other authority submissions in this regard.

DIRECTOR

SIGNATURE

DATE

Mr PR Eksteen


.....


8/10/24 2024

Appendix F (C413)

		1. I hope you are well. I came across a public participation process notice for "proposed expansion of Cape Winelands Airport" 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] I follow building and construction related projects from conceptual / feasibility up until completion. Please can you email me a copy of the background information document or motivating memorandum or any other documents or reports for this project.	1. Thank you for the email. 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. You can access the draft EIAR and background documents at the link https://phsconsulting.co.za/proposed expansion-of-cape-winelands-airport/.
305 & 340	Barbara Gale - Local Resident	Email dated 19 November 2024: 1. 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). 2. 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. 3. 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. 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:	Email response provided 22 November 2024: 1. Hope you are well I acknowledge receipt of your communication and will respond soonest <u>EAP responses:</u> 2. 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. 3. <u>The comments are noted.</u> 2. An extension was granted to 13 January 2025, taking into account the compulsory break from 15 December to 5 January, this was an effective 8 day extension. The response was "The request for a public meeting will be considered". BUT, another Open Day was provided? 3. The response to this was "The comments are noted". BUT the Guidelines were still not followed. A Public Meeting (not an Open Day) with Translators for English, Afrikaans and isiXhosa, where the documents can be explained, questions asked & minutes circulated, is called for in the Guidelines - minimum requirements are insufficient, owing to the size of project and multitude & diversity of affected communities.

	"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." 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. 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 <u>Guidelines promote a Public Meeting for special/marginalized communities.</u> 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. 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	4. Response: A public meeting was held on 8 May 2024. <u>The Open day format was chosen as it allows IAPs to interact unrestricted with specialists and to obtain additional information on their specific query.</u> <u>4. The response was that "The Open Day Format was chosen", this is not in accordance with the Guidelines and stated above.</u> 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 <u>if this situation arises.</u> <u>5. The Response was that 'the EAP would consider application for extension of timeframes, if there is new information to be shared with I&APs'. This was done, thank you.</u> 6. Response: Meetings conducted were in English, with isiXhosa and Afrikaans translation facilities available.

	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. 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. Email dated 22 November 2024: 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. Email reply dated 26 November 2024: 9. I will most likely be commenting as an individual and possibly on behalf of the JCF. 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].	Response: The request for executive summaries to be made available in Afrikaans and isiXhosa 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. 6. The response to this was that "Executive Summaries in Afrikaans or isiXhosa, can be made available on request". Executive Summaries for the Amended EIAR were provided in English, Afrikaans and isiXhosa, But owing to the Open Day Format, the documents could not be explained to the community in all three languages. This remains a major problem for the process. 7. Noted Email communication from EAP dated 26 November 2024: 8. Please clarify for me whether you will be commenting on behalf of JCF. 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. Email response provided 27 November 2024: 9. Thank you for the email. I grant you extension for comment until 13 January 2025. I have clarified telephonically with Susan that the below communication was sent in her capacity as representative for The Pearly Trust.

	Email reply dated 28 November 2024: 10. Thank you for the effective 8 day extension until 13 January 2025. Will this extension be awarded to all I&APs or is it only specific to those who apply? Please advise on the proposed timeframes thereafter. Please could you respond to my question regarding the process for the 2nd phase of Public Participation - Will we be getting an updated EIAR with a CRR of the 1st round of comments or will it just be a second opportunity to comment on the same reports? Thank you for your kind cooperation in this matter. Please acknowledge receipt of this email. Email dated 13 January 2025: 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. 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. <u>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.</u> 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.	Email response provided 28 November 2024: 10. <u>Extension to comment is granted on an individual case by case basis. Proposed timeframes will be as in die draft EIAR section 10.4.</u> The second round of PPP will be on the amended draft EIAR and will include a C&R. 10. <u>Regarding a question as to whether or not the extension granted would apply to all I&APs, the response was 'Extension is granted on an individual case by case basis. I think this is against the regulations, all I&APs should be given an equal amount of time to comment</u> 1. Response from ITS: <u>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.</u> <u>Please note that this is confirmed by the Blaauwberg DSDf vol 3, page 7 (attached). The response to this was that 'The Lucullus Road extension is not a requirement to accommodate the airport's first phase, was only assessed for when the airport is fully developed, but airport traffic is likely to use the R304 and R300 to connect to the N1'. It is requested that Lucullus Rd Extension be excluded from the access routes as a condition of approval. Page 632 of the Amended draft EIAR states that Option 3: Access via Lucullus Rd extension is the preferred initial route, This must be removed.</u>

	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. The Response was that 'the time of the field assessments were considered acceptable. An additional field assessment was done in April 2024'. As a qualified Freshwater Biologist, field assessments in summer and early autumn before the winter rains are not true representations and a wet season assessment should still be done. 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. I accept that the wetland offset should be nearby in order to conserve form and function, but it remains a net loss of wetlands if an existing wetland is rehabilitated. In order to achieve no net loss of wetlands, the rehabilitated wetland offset should be extended (additional wetland created in-situ) by the amount of wetland that will be lost from the development site (7.44ha).	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. 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

			of terrestrial biodiversity and ecosystem services and/or it can often trigger additional environmental approvals, such as EA, which complicates the process. 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: • 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

		• 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). <table><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><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></table> * The final offset contribution is the sum of the offset contribution of the respective wetlands, therefore equating to ~40 ha.		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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Species Conservation (HaE)	-	-			Not assessed, however the biodiversity offset along with the wetland offset is regarded as appropriate to address species loss.																			
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																						

	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." Surely these areas should be development exclusion zones to prevent unmitigable impacts on biodiversity. The Response to this was a) "the required biodiversity offset will not result in an unacceptably high level of botanical loss on this site". Who determines what is acceptable/unacceptable, were site assessments done and in what season? b) regarding the area with high sensitivity for terrestrial fauna (bird species) the response was that "During the site assessment, none of these species were observed on site" and "breeding of these species within this area is unlikely". When was the site assessment, was seasonal distribution considered and were locals consulted? Since these species are rare and endangered, no harm should come to them.	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 <u>required biodiversity offset will not result in an unacceptably high level of botanical loss on this site.</u> Response from SAS: 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 <u>sensitivities of a medium, high or very high are confirmed, the full reporting protocol is to be followed.</u> However, where a low sensitivity is confirmed, a compliance statement can be submitted. 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, <u>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.</u> These species however may forage periodically within the study area (Avifaunal report, Part C section 3). Based on the ground truthing

		c) regarding medium sensitivity species, the response was that "None of these species are expected to occur", but it would appear that no site assessment was done. Again, were locals consulted? A minimum requirement should be a Search and Rescue program included in the EMPr. 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. Thank you for your kind cooperation in this matter. Please acknowledge receipt of this email.	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. Similarly, the screening tool indicated a <u>medium sensitivity</u> 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). <u>None of these species are expected to occur within the study area due to habitat disturbances.</u> 5. Noted
306	Guy Gibbon - Africana Engineering	Email dated 20 November 2024: 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	Email response provided 21 November 2024: 1. As a registered I&AP you will continue to be notified of the progress of the EIA during the process.

movement routes (e.g. separation of NMT, traffic calming, nature of road crossings), the management thereof (e.g. vehicular speed) and the nature of urban development interfacing with these routes (positive frontages will support surveillance and safety).

- The development of main public (and where possible private) links into and through major open space areas in the district which connect destination places and movement generators. These include nature tracks for hiking and biking. In the Blaauwberg District there are existing cycle routes along the R27 to Berkshire Boulevard in the north and Koeberg Road via Blaauwberg Road, which links up, with the R27 in the west. Additionally, there are proposals for linking Atlantis to the southern section of the District with routes being prioritised by the relevant department.
- Consideration should be given to utilising the outer edges of road reserves for NMT where possible and appropriate (i.e. where NMT is required, where road reserves are wider than minimum requirements, and if NMT would be fully fenced off from the route itself.
- The linking of significant public open spaces within urban areas, along open space (green) corridors or most appropriate public roads, towards the establishment of a network accessible to NMT across the district, and through the district to neighbouring districts. This should include the establishment of pathways through/around/along open spaces, and appropriately, (re-)designed landscaped, tree-planted roads/pavements between these open spaces. See sub-district maps in Volume 2.
- Tree planting and landscaping should be a focus (for Ward budgets, adjacent property developers, etc.) along identified NMT routes to assist with NMT legibility, safety, and attractiveness, while progressively contributing to urban heat generation mitigation by effectively narrowing asphalt exposure to the sun.

The map on the opposite page shows the Public Right of Way (PROW). This shows the long-term potential road network for the City's future expansion, as of 2017. The precise location of roads is subject to development proposals and more detailed contextual investigations at the times the road links are required. To note – the 2017 PROW was developed on a previous urban expansion scenario, which included a large development corridor towards Atlantis. This large corridor has been contracted in the current spatial plans.

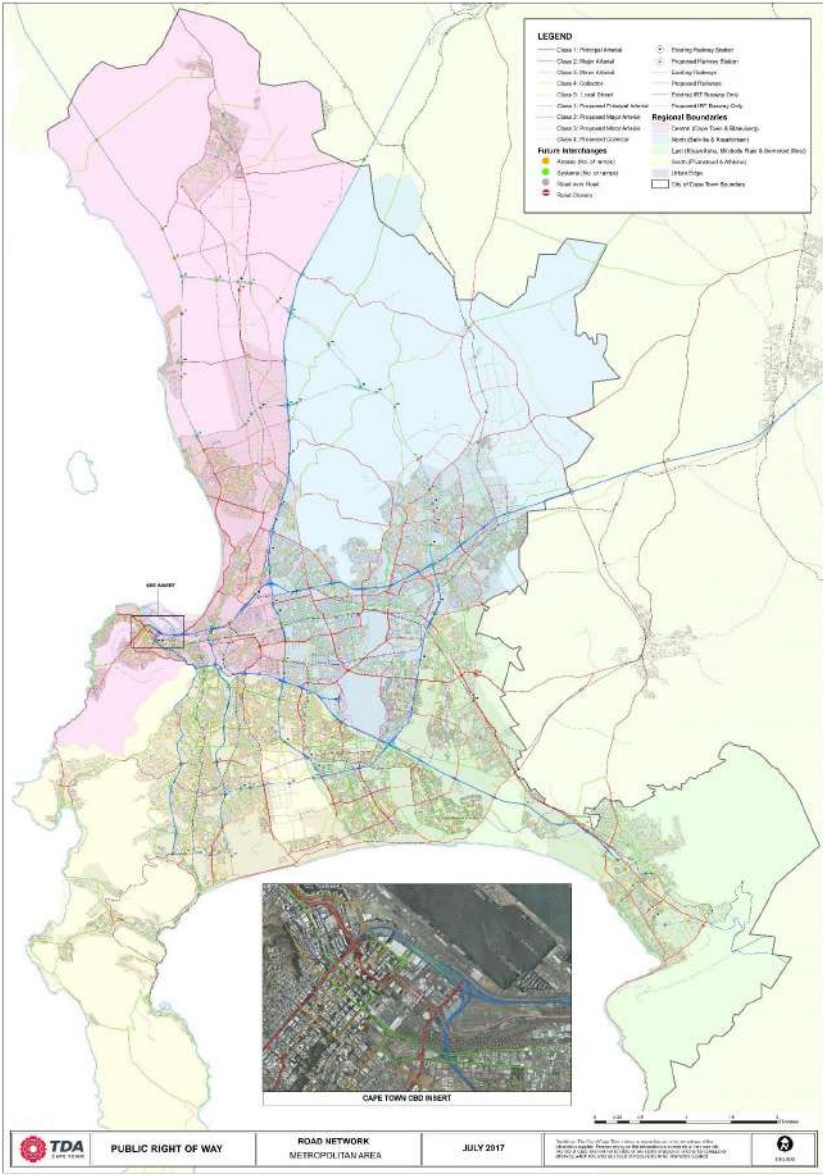


Figure 1.3: Public Right of Way