

APPEALS AGAINST THE ENVIRONMENTAL AUTHORISATION GRANTED FOR THE PROPOSED EXPANSION OF THE CAPE WINELANDS AIRPORT

(P10 OF FARM 724, RE OF FARM 724, P23 OF FARM 724, P7 OF FARM 942, RE
OF FARM 474, P3 OF FARM 474 AND P4 OF FARM 474)

APPEALS RECEIVED ON OR BEFORE 19 NOVEMBER 2025



APPEAL 1

APPELLANT:LEONARD HEYDENRYCH

DATE RECEIVED:
15 NOVEMBER 2025



APPEAL FORM

In terms of the National Appeal Regulations

April 2019

Form Number: 2019

Note that:

1. This appeal must be submitted within **20 days** of being notified of the decision.
 2. This form is current as of **April 2019**. It is the responsibility of the Appellant to ascertain whether subsequent versions of the form have been released by the Appeal Administrator.
 3. This form must be used for appeals submitted in terms of National Appeal Regulations, 2014 in so far as it relates to decisions in terms of the:
 - a. Environment Conservation Act, 1989 (Act No. 73 of 1989);
 - b. National Environmental Management Act, 1998 (Act No. 107 of 1998);
 - c. National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004);
 - d. National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004);
 - e. National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008); and subordinate legislation made in terms of these laws.
 4. The required information must be inserted within the spaces provided in the form. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. The spaces may be expanded where necessary.
 5. Unless protected by law, all information contained in, and attached to this application, will become public information on receipt by the Department.
 6. A digital copy of this form may be obtained from the Department's website at <http://www.capegateway.gov.za/dept/eadp>.
 7. Please consult the National Appeal Regulations (dated 8 December 2014) and the Department's Circular EADP 0028/2014 on the "One Environmental Management System" and the EIA Regulations (dated 9 December 2014), and any other relevant regulations.
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A. DECISION BEING APPEALED

1. Reference Number of the Decision being appealed:
EIA 16/3/3/2/A5/20/2046/24 and NEAS WCP/EIA/0001497/2024

2. Type of Decision being appealed (please circle the appropriate option):

Environmental Authorisation	24G Administrative Fine	Amendment of Environmental Authorisation	Amendment of Environmental Management Programme	Waste Management Licence	Atmospheric Emission Licence	Exemption Notice
Permit in terms of NEM: BA	Administrative Notice/ Directive	ECA: OSCA Permit	Other			

3. Brief Description of the Decision:

THE
PROPOSED EXPANSION OF THE EXISTING 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_The
decision to grant Environmental Authorization was given.

4. Date of the decision being appealed (i.e. date on which the decision was made):

27 OCTOBER 2025

B. APPELLANT'S INFORMATION

5. Please circle the appropriate option

Applicant	State Department / Organ of State	Interested and Affected Party

6. Appellant's information:

Name: Leonard Goussard Heydenrych

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Tel: 021 976 2644 Cell: 0825679344

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C. APPEAL INFORMATION

7. Did you lodge an Appeal submission within 20 days of the notification of the decision being sent to you?

Yes / **No** (Circle the appropriate response). If "Yes", attach a copy herewith.

8. The following documents must accompany the appeal submission, kindly indicate if they have been attached to the submission:

- 8.1 a statement setting out the grounds of appeal?;

Yes / **No** (Circle the appropriate response)

- 8.2 supporting documentation which is referred to in the appeal submission?;

Yes / **No** (Circle the appropriate response)

- 8.3 a statement, including supporting documentation, by the appellant that a copy of the appeal was submitted to the applicant, any registered interested and affected party and any organ of state with interest in the matter within 20 days from:

- 8.3.1 the date that the notification of the decision was sent to the registered interested and affected parties by the applicant.

Yes / **No** (Circle the appropriate response).

Please indicate the date on which a copy of the Notice of the decision was sent. **29 October 2025**

OR

- 8.3.2 the date that the notification of the decision was sent to the applicant by the competent authority, issuing authority or licensing authority.

Yes / **No** (Circle the appropriate response).

Please indicate the date on which a copy of the Notice of the decision was sent. **27 October 2025**

D. GROUNDS OF APPEAL

9. Set out the ground/s of your appeal: Clearly list your appeal issues and provide an explanation of why you list each issue.

The following issues are addressed in this appeal and will be discussed in greater detail in the following paragraphs. A summary follows before the discussion.

Noise pollution

The constant noise created by the airport will have a profoundly negative impact on the surrounding community, but in particular on the children of Fisantekraal High School, which is situated only 1.4 kilometres (km) from the proposed airport. This will have a profoundly negative impact on their health and study abilities, as can be seen in the attached documentation.

Geographical Location

After reviewing the geographical location of the proposed airport, it was noticed that several factors could be identified that may endanger the surrounding community, passengers and crew. This included several geographical mountainous elevations within close proximity to the proposed runways. There is also the inevitable risk of a congested airspace due to the close proximity of the Cape Town International Airport to the proposed Cape Winelands Airport (CWA) expansion. The separation between the two locations is only 24 km.

Birdlife

Durbanville has always been a bird sanctuary and many water sources surrounding the proposed airport expansion have been crucial in maintaining the natural birdlife in this area. Looking at the vast quantities of water in close approximation to the proposed airport expansion, it is reasonable to assume on scientific and factual grounds, that birdlife in this area will pose a significant threat to any jet propelled aircraft. This will inevitably pose a significant risk to passengers, crew and residents.

Critically Endangered indigenous vegetation

It is mentioned in the development proposal that the construction will include the clearance of more than 300m² of critically endangered indigenous vegetation. This will have a severely negative impact on the environment and is not in accordance with international protocol. It again emphasizes the unsuitability of this specific area for an airport expansion.

Sustainability and Climate change

The total emissions for the airport by 2050 are estimated at 5.3 million tons of carbon dioxide equivalent. A Google AI overview confirms that this is considered a very high amount and comparable to the annual emissions of a small city. On the long term this could have a severely detrimental impact on the Western Cape Winelands, and therefore internationally there is a drive to reduce long haul flights and to build fewer airports.

Appeal letter against

THE PROPOSED EXPANSION OF THE EXISTING 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

EIA REFERENCE: 16/3/3/2/A5/20/2046/24

NEAS REFERENCE: WCP/EIA/0001497/2024

15 November 2025

Durbanville

Dear Mr. Marius Venter and Appeal Administrator

Noise pollution

We believe that the environmental impact of the proposed Cape Winelands Airport (CWA) has not been adequately addressed. For this reason, we oppose the intended development of the CWA as well as the rezoning of this area. Our concerns relate predominantly to the effect that noise pollution created by the proposed airport will have as well as other factors. We have previously outlined some of the detrimental effects that the airport will have on the health of residents of the area surrounding the airport. Additional information is provided in this document.

The Fisantekraal High School is situated approximately 1400 meters (m) from the planned airport runway and even closer to the planned airport. This exposes the school to significant health risks should the airport be built. According to Faiyetole et al 2019, residential areas should not be nearer than 4 kilometers (km) from a runway. Expanding the current runway will therefore be a violation of well accepted international practice which could lead to children being harmed. The significant health risks associated with airports are very well documented such as mental health problems such as fear, depression, frustration and increased blood pressure which are more frequent with exposure to noise above 60 decibel (dB) in the daytime and 45 dB at night. Learning difficulties are also a common phenomenon with children exposed to a noise level above 50 dB and have also been described as severely influencing children from concentrating and studying. (Faiyetole et al 2019, Wigatiningrum R et al 2021)

The international minimum safe distance from an airport to housings, residential areas or schools are 4 km. (Faiyetole et al 2019) The area should also be barrier free with a 4 km radius from the runway to protect aircraft when landing or taking off (Wigatiningrum R et al 2021). This is also to protect children from possible aircraft accidents, as were tragically recently seen in India and Louisville. Fisantekraal High School falls well within this distance (1400 meters) and therefore the health of children and adults will be at severe risk. Wigatiningrum et al states that activities that require more concentration such as working and studying will be disturbed by noise. The authors state that the performance or ability of someone to complete his/her work will be decreased and slower when exposed to noise in the long term. This will therefore have a profound effect on the health, scholastic development and wellbeing of the children. The possible consideration to remove the children from their natural school due to excessive noise exposure could also have a profoundly negative impact on their wellbeing. The children and adults may also develop psychological and emotional disturbance.

Wigatiningrum et al also states that any distance less than 4 km from the airport are categorized as risky. They state that the closer the distance from housings to the airport, the greater the noise level will be. In their assessment of 'activities performances' they found that the dominant disturbance is felt when working and studying, and concentration during learning is also disturbed. They state that based on the International Civil Aviation Organization (ICAO) measurement, the longest disturbance occurred at a distance of 4 km.

There is sound attenuation due to spherical divergence, atmospheric absorption, and interference from ground reflections, which could impact on the observed noise by learners, teachers and residents. (Faiyetole et al 2019) Remarkably the predicted distance increase with decreasing noise level for each of the models fits. A distance of 3 km to the side of the flight paths calls for concerns. The authors further show that approximately 3.8 km distance is required for a 55 dB threshold for a noise abatement zone that requires aircraft to be higher than 1.5 km above the ground level before flying over residential areas. Faiyetole and coauthors report that the minimum safe distance to achieve a morning aircraft take-off noise level threshold of less than 45 dB for urban residents to ensure limited complaints or minimum potential health hazards, is about 3.6 km. The minimum safe distance increases to 3.64 km in the afternoon, and 4 km in the evening. The authors consider the minimum safe distance in the evening as a standard minimum for situating an airport away from residential houses, which would be 4 km. (Faiyetole et al 2019) The authors predict the minimum radial distance for the 40 dB, 45 dB and 50 dB thresholds. The minimum distance of approximately 3.60 km, 3.64 km and 4.04 km are thus predicted as the safe limits from the morning, afternoon and evening take-off data. (Faiyetole et al 2019) The researchers show that within 2.7 kilometers from the airport, all noise levels were above 78 dB. Please see the below graphs.

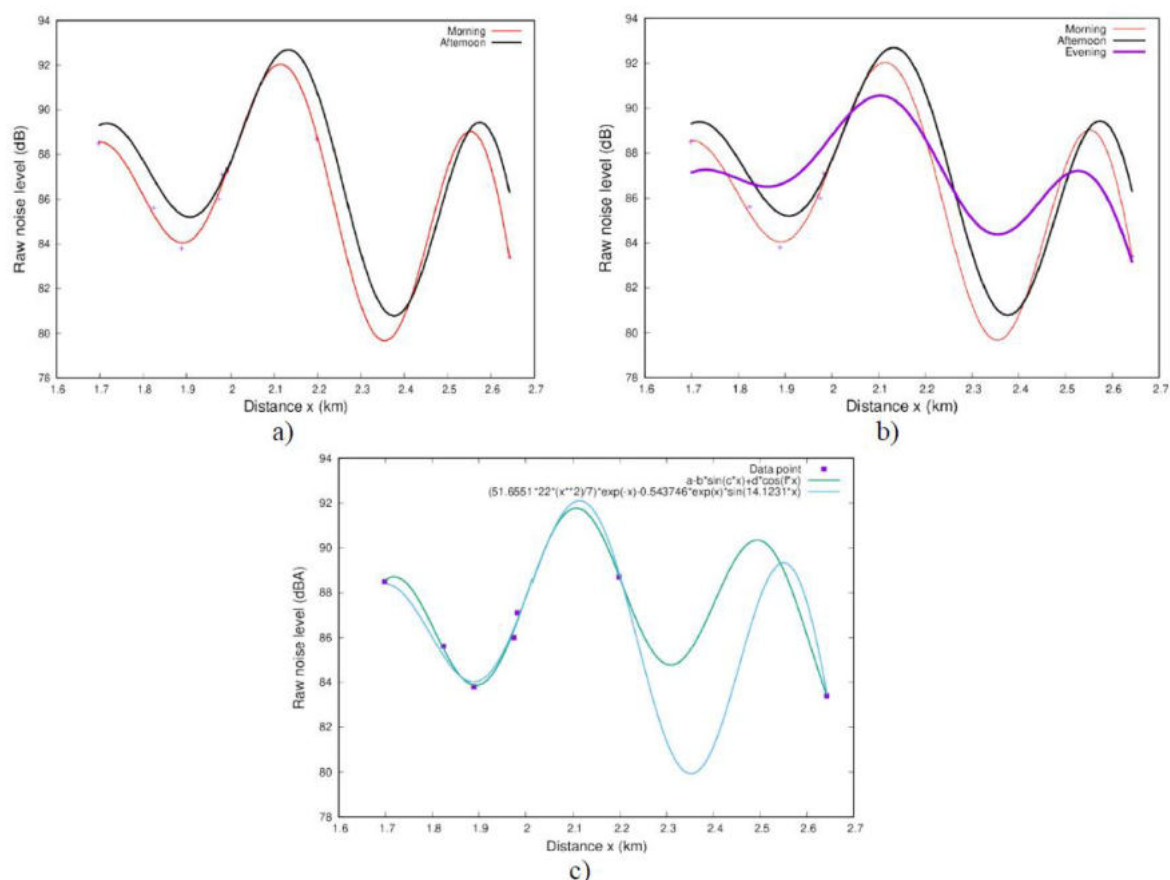


Fig. 2. Plots for a) morning and afternoon take-offs, and b) morning, afternoon and evening take-offs, c) comparison of the model functions in Eqs. (1) and (2) with the data for morning take-offs

Above graphs taken from: Faiyetole A et al, VIBROENGINEERING PROCEDIA. MARCH 2019, VOLUME 22

This data also corresponds well with the calculations made by an independent South African physicist, when using the following international **Inverse Square Law Formula** and Calculator.

The calculator below is used to calculate the sound pressure level at a specific distance of 1400 meters from the sound source at the airport.

The noise created by an airplane taking off is estimated at 140 dB. (Malouf WT et al, 2024) The effect on hearing as stated by Malouf et al is 'Immediate harm.'

The Inverse Square Law Formula is $V_2 = V_1 - 20 * \log_{10}(d_2/d_1)$ and it is used to calculate the decibel level at the Fisantekraal High School which is situated approximately 1400 meters from the sound source at the CWA airport. $V_1 = 140\text{dB}$ at $d_1=10\text{m}$ and $d_2 = 1400\text{m}$ (<https://observablehq.com/@categorise/how-noise-travels-fast>)

$V_2 = 97.1$ dB at the Fisantekraal High School, which is 1400 meters away from the airport. The calculator used can be found at https://www.engineeringtoolbox.com/inverse-square-law-d_890.html. The sound pressure level at Fisantekraal High School (1400 meters from the airport) will be 97.1 dB

Realistically, a jet engine's volume is measured about 10 m away. With $d_1=10$ m, $V_2 = 97.1$ dB at the school, which is 1400 m away from the sound source. On average, the sound volume about 800 m away from the airport will be between 80-100 dB.

Permissible Distance under EHS (Environmental Health and Safety) Guidelines

The World Bank/IFC (International Finance Corporation) EHS Guidelines for Noise Management recommend limiting daytime noise levels at sensitive receptors (e.g., residences, schools) to 55 dB and nighttime levels to 45 dB. (<https://observablehq.com/@categorise/how-noise-travels-fast>) The perceived aircraft noise (97.1 dB) at Fisantekraal High School will therefore be well above the legally perceived noise levels and will therefore harm children and severely disturb their studying. The American Academy of Audiology (2010) states that noise levels of over 85 dB for extended periods can cause permanent hearing loss. Due to well recognized sound attenuating factors, e.g. temperature, wind direction, humidity and echoing from fixed structures, it is reasonable to expect decibel levels to surpass 97.1 dB at intervals, which could lead to permanent hearing loss in this subgroup of children at Fisantekraal High School. It is unsure if these noise risks have been thoroughly discussed with pupils, parents and staff at Fisantekraal High School, not even to mention the severely detrimental effect on concentration, studying ability and the performance and studies of music. In support of this calculation a study from Korea found that chronic exposure to noise from military airfields influenced the cognitive functions, thereby reducing the learning performance of Korean children.(Baek K et al 2023)

Mathematical models therefore proof undoubtedly that the sound impact at Fisantekraal High School will therefore reach levels of at least 97.1 dB when an aircraft takes off at the airport. This will make it impossible for children to function, study or thrive at Fisantekraal High School. Music education in particular will be impossible at this distance from the runway. Another academical institution which could also be negatively impacted by the proposed CWA development is the Durbanville High School, situated 10.67 km from the airport. The perceived noise as calculated by the Inverse Square Law Formula when aircraft take off at the proposed CWA, would be 60.6 dB at Durbanville High School, which is well above the international legal noise limit of 50 dB for schools. (Faiyetole et al 2019) These noise levels will influence the concentration levels of the students and will interfere with their studying. (Faiyetole et al 2019) Durbanville High School has one of the biggest music departments in the Western Cape and it is reasonable to assume that musical studies in particular will be negatively impacted due to perceived decibel levels

above 50 dB. (Faiyetole et al 2019) Since the calculated decibel levels at Durbanville High School will exceed 60 dB, it is also reasonable to assume that there could also be associated health risks involved, even at a decibel level above 45 at night time. (Faiyetole et al 2019)

The impact studies mention that the Fisantekraal community will fall outside the 4 km impact zone, but do not mention that the Fisantekraal High School will fall directly within this impact zone according to distances calculated by means of Google Maps 2025. The airport's impact studies also do not mention at what decibel level a jet aircraft generally takes off, which is usually at a level of 140dB and causes immediate hearing harm (Malouf WT et al 2024) This will directly influence the perceived sound at Fisantekraal High School, which would according to international standards be well above the legal level of 50 dB for undisturbed studying. (Faiyetole et al 2019) There will also be associated health risks involved for the group of students at Fisantekraal High School, since noise levels will exceed 60 dB. (Faiyetole et al 2019)

McKoy states that the distance someone could experience 45 dB of aircraft noise could reach out as far as 22 miles from a major airport. Sound could therefore also negatively influence many other schools in the Durbanville and surrounding areas with severe detrimental effects on the health and studies of children. (McKoy J et al 2024)

It is also documented that low-income populations are disproportionately exposed to aircraft noise. (Simon M et al 2022) This would unfortunately be a true prediction if the airports company is granted permission to build the airport in Fisantekraal. Simon et al states that this should provide valuable insight for local policy makers considering environmental justice issues.

Taking all the above factors into serious consideration we therefore strongly oppose the proposed plan to build and expand the proposed Cape Winelands Airport in the heart of the Western Cape Wine Country, since the community who will suffer the most because of this planned project would be the children of the Western Cape.

Other aspects regarding the impact of the planned CWA are now discussed.

Geographical Location (Measurements calculated according to Google Maps 2025)

Another important aspect of appeal against the expansion of the CWA is the location of the proposed airport. CWA is surrounded by several geographical mountainous elevations within close proximity of its planned runways. These locations include the Paarl Rock elevation [-33.73963073286203, 18.896754515611374] (14 km from runway), Simonsberg elevation [-33.8406836738251, 18.8825667556681] (14.5 km from runway), 'Kanonkop' elevation in Durbanville [-33.82034688631391, 18.592698735500765] (14.18 km from runway), Tygerberg Nature Reserve elevation [-33.8752199721784, 18.595710942888214] (16.5 km from runway), Klappmuts elevation [-33.82224089751027, 18.851811877059383] (11.17 km from runway) and Paardenberg elevation [-33.62885300157449, 18.79082044906599] (15.84 km from runway). These mountainous elevations could pose a significant risk to incoming and outgoing aircraft during adverse weather conditions. It is reasonable to assume that this must have been the major reason why the Allied Fisantekraal airport of 1943, was not expanded, but that another location (Cape Town International Airport) was rather sourced with minimal surrounding geographical mountainous elevations.

As a longtime resident of Durbanville I am well aware of the frequent severe fog conditions during winter, when these above-mentioned geographical mountainous elevations could pose a significant risk to aircraft, when flight paths may need to be altered and navigation between several of these beacons might become

severely challenging when flying big passenger aircraft. The location of the airport could therefore also pose a risk to passengers and crew combined with the fact that the two airports (Cape Town International and CWA) are in such close proximity to each other (only 24 km). This could lead to a congested airspace with increased risk of collisions. This is also acknowledged by Royal Haskoning DHV (Pty) (Ltd) who 'found that the expanded CWA will impact airspace operations in the area, as well as neighbouring developments.'

It is interesting to note that other major world cities also have more than one airport, but not in such close proximity as is planned in the Western Cape. In London, Heathrow airport is situated 33.3 km from London City Airport; in Washington, Dulles International Airport is situated 36 km from Ronald Reagan Washington National Airport; in New York, John F Kennedy International Airport is situated 32 km from Newark Liberty International Airport; in Paris, Charles de Gaulle Airport is situated 34 km from Paris-Orly Airport (ORY); in Brussels, Brussels Airport (BRU) is situated 49 km from Brussels South Charleroi Airport (CRL) and in South Africa, OR Tambo International airport is situated 37.4 km from Lanseria International Airport. Other major cities with significantly bigger capacity than Cape Town only have one international airport to serve the community such as Berlin, Frankfurt, München, Barcelona, Copenhagen, Zurich and Vienna to mention a few. This raises serious questions regarding the need for a second international airport in the Cape Town area.

Critically Endangered indigenous vegetation

It is mentioned in the development proposal that the construction will include the clearance of more than 300m² of critically endangered indigenous vegetation. The national guidelines are very clear in nature conservation areas and in the Western Cape that critically endangered vegetation may not be removed. The airport development will therefore harm indigenous vegetation and precious agricultural land and it is therefore not suitable to expand the airport in this location due to its negative impact on the environment.

Birdlife

Point 42.4 of the environmental authorization states the following: 'The exposed water surface area of the rehabilitated quarry must be suitably covered, as far as possible, in order to mitigate the attraction of birdlife and suitable vegetation must be planted on either side of the ponds to discourage bird movement between ponds.' These rules have been advised to try to mitigate the risks of bird strikes in close proximity to the planned CWA. A study of water sources in close approximation to the airport has been made (Google maps 2025), and 5 very big sources were found. They are listed below.

1. [-33.77692704607007, 18.759690918678686] Water source 290X600 m situated 1200 m from airport.
2. [-33.77498864905356, 18.750250547170847] Water source 70X100 m situated 353 m from airport.
3. [-33.77770108595355, 18.753745716795297] Water source 100X180 m situated 765 m from airport.
4. [-33.75589838666833, 18.732505312090396] Water source 170X50 m situated 500 m from airport.
5. [-33.76054266050489, 18.74190640464555] Water source 78X81 m situated 437 m from airport.

Durbanville has always been a bird sanctuary and these water sources have been crucial in maintaining the natural birdlife in this area. It would certainly not be possible to cover such vast amounts of water to try and mitigate and reduce the movement of birds and in the process natural habitat will be destroyed. No vegetation planted on the sides of these 'lakes' would be able to prevent birds from migrating over lakes or from one source to the other, according to their natural instincts and habitat. Looking at the vast quantities

of water in close approximation to the proposed airport expansion, it is reasonable to assume on scientific and factual grounds, that birdlife in this area will pose a significant threat to any jet propelled aircraft. This will inevitably pose a significant risk to both passengers and residents. The impact assessment states that there is a primary bird hazard zone surrounding the airport site which is attributed to the agricultural land use and water bodies. This attributes to the abundance and presence of high risk bird species which may collide with an aircraft. The impact study clearly states that there is a risk for bird strikes, a risk in my opinion which is not worth taking.

The impact assessment also states that ICAO guidelines for bird strikes include the consideration of a 13km radius around the site, which needs to be investigated for a source of birds. The above mentioned water sources, which attracts most species of birds, falls well within this impact zone.

As mentioned in the environmental authorization, the famous national bird of South Africa namely the Blue crane bird (*Grus paradiseus*), 'which particularly favours the on-site cultivated fields' adjacent to the airport, will be severely negatively impacted. Many other indigenous bird species will also be threatened by the proposed development and these birds will unfortunately also pose a significant risk to aircraft safety. These facts again accentuate the unsuitability of this area for an airport expansion.

Sustainability and Climate change

The impact studies state that the total emissions for the airport by 2050 are estimated at 5.3 million tons of carbon dioxide equivalent, which is mentioned as a medium impact in the environmental authorization. A Google AI overview though states differently, that it is considered a very high amount and comparable to the annual emissions of a large industrial facility or a small city. This will have a severely detrimental impact on the Western Cape Winelands, and therefore internationally there is a strong drive to reduce long haul flights and to build fewer airports. The same principles of reducing our emissions should also be applicable to South Africa, according to COP30.

Taking all the above-mentioned factors into careful consideration we therefore strongly oppose the proposed expansion of the Cape Winelands Airport on scientific merits, due to the unsuitability of the location.

Yours sincerely

A handwritten signature in black ink, reading 'L. G. Heydenrych'. The signature is written in a cursive, flowing style.

Leonard G Heydenrych

MBChB, DFFP (Lond), PGDip (RCM, Lond), MMUS (TCM, Lond), FCOphth (SA), FRCOphth (Lond), MMed (UCT), Cornea Fellowship (Moorfields, Lond)

References

1. Faiyetole A, Toyin I, *Predicting the aircraft take-off noise level*, VIBROENGINEERING PROCEDIA. MARCH 2019, VOLUME 22
2. Wigatiningrum R, Wiranegara H W, Luru M N, *Effect of distance of housing to airport on noise disturbances level (case: housing around Soekarno-Hatta International Airport)* The 5th International Seminar on Sustainable Urban Development, IOP Publishing, IOP Conf. Series: Earth and Environmental Science 737 (2021) 012030, doi:10.1088/1755-1315/737/1/012030]
3. Malouf WT et al, Evaluation of hearing loss: Understanding Audiologic Testing to refine Image Interpretation, RadioGraphics, 2024, Volume 44 (10)
4. American Academy of Audiology (2010), *Levels of Noise*
5. Baek K, Park C, Sakong J, The Impact of Aircraft Noise on the Cognitive Function of Elementary School Students in Korea, Noise Health, 2023 May 12;25(117):83-91
6. McKoy J, Airplane Noise May Be Bad for Your Health, The Brink, Boston University Public Health, June 4, 2024
7. Simon M, Hart J, Levy J et al; Sociodemographic Patterns of Exposure to Civil Aircraft Noise in the United States; Environmental Health Perspectives, Feb 2022, Vol 130, Issue 2

9.1 Is your appeal based on factors associated with the process that was followed by the applicant/Environmental Assessment Practitioner/Competent Authority in reaching the decision?

Yes / **No** (Circle the appropriate response). Please provide details.

The time span of decisions made regarding the proposed airport has been of such quick succession that the public has not had sufficient time to respond to the proposed developments of the CWA. Up to date we are not aware that the public has been informed of the negative impacts that the proposed airport could have on their health and emotional state. A specific reference in this regard has to be made regarding the Fisantekraal High School who will be the closest public entity to the proposed development. We are not aware that the school and pupils have been informed of the negative impacts of the airport on their health and wellbeing.

9.2 Is your appeal based on factors associated with matters of unacceptable environmental impacts/extenuating circumstances not taken into account by the Competent Authority?

Yes / **No** (Circle the appropriate response). Please provide details.

After performing a thorough geographical location search we have discovered that several geographical factors could endanger passengers, crew and the community. We have discovered several geographical mountainous elevations which could pose significant challenges and risks to big passenger aircraft and which are within close proximity to the runways. Several water sources were discovered in close proximity to the planned CWA and these will attract bird life, for which the natural heritage area of Durbanville is famous, since this is their natural habitat. As stated in the impact studies, these birds could pose a significant risk of bird strikes to aircraft. By trying to eliminate birds from these critical areas it could mean to try and cull them or otherwise to make the area uninhabitable for these endangered bird species such as the national Blue crane bird. It has therefore been suggested in the impact studies that water sources should be covered to prevent birds from thriving in their natural habitat. We find this inhumane

and unacceptable. It again accentuates the fact that the location of this proposed airport is not suitable.

9.3 Have your appeal issues been raised previously in the public participation process?

Yes / **No** (Circle the appropriate response). Please provide details.

We have forwarded the necessary documentation in this regard to the airports company via their environmental consulting agency (PHS Consulting), but we have not received any specific feedback with regards to our concerns raised. New concerns have now been raised in this appeal regarding geographical location, birdlife, endangered plant species and passenger and community health and safety.

9.4 Are you fundamentally opposed to the decision (e.g. to any development activity on the site)?

Yes / **No** / **Not applicable** (Circle the appropriate response). Please provide details.

The impact on health and safety of the community and the Fisantekraal High School in particular is too high in my opinion to risk this proposed development. The negative long term impact on the wine industry in the Western Cape and the surrounding agricultural farm land is too risky to take. The safety of passengers and aircraft could also be at stake due to the geographical location of the proposed airport and the significant risks of bird strikes in this area. These facts have not been raised before.

9.5 Are you in favour of the decision if your concerns can be remedied by rectifying the process or by mitigating or eliminating an impact/s of the activity/ies?

Yes / **No** / **Not applicable** (Circle the appropriate response). Please provide details.

No mitigating factors would be able to eliminate the risks involved, in particular the abundance of so many geographical mountainous elevations which are in such close proximity to the airport. No mitigating factors would be sufficient to try and prevent bird strikes in a natural bird sanctuary.

9.6 Please indicate what measures you propose to have your concerns remedied.

Another more suitable location should be sourced for the proposed airport. This should be a significant distance removed from any residential areas or schools and could be reached via train or road. International guidelines state that an hour's travel to an airport via train or vehicle is seen as a close proximity to a city. This area should be free from geographical mountainous elevations or the risk of bird strikes and should not impact negatively on schools or residences according to

international guidelines. Another suitable location could be sourced, which will not endanger the Western Cape Wine Country, which is one of the most precious assets of the Western Cape.

9.7 Does your appeal contain any new information that was not submitted to the Environmental Assessment Practitioner (EAP) / or registered I&APs/ or the competent authority prior to the decision?

Yes / **No** (Circle the appropriate response). If the answer above is "Yes" please explain what this information is and why it should be considered by the Appeal Authority and why it was not made available to the EAP/ or I&AP/ or the competent authority prior to the decision. (Please ensure that the new information is attached hereto.)

Further research has enabled us to calculate the decibel levels of noise that would be perceived by the children and staff at Fisantekraal High School. We noticed that according to the internationally accepted take-off noise of a jet engine, the perceived noise experienced by the pupils and staff at Fisantekraal High School would be far above the normal accepted levels. All the necessary documentation is attached to prove this. This would have a profoundly negative impact on the academical studies and wellbeing of the children according to international publications attached.

Our research has also revealed that several geographical mountainous elevations are present nearby the proposed airport which could complicate the flight paths and endanger incoming and outgoing aircraft, especially during adverse weather conditions.

The risks associated with this site are further increased due to the abundance of birds in this area, which is their natural habitat, due to several big water sources, lakes and agricultural land in close proximity to the airport. This will significantly increase the risk of bird strikes.

Research has also revealed that at least 5 big water sources are in close proximity to the planned runway. Furthermore, due to agricultural activities in this area over the past 400 years, most neighboring farms will have their own water sources and dams. Birds will naturally migrate between these water sources and will inevitably therefore cause a risk to any flying yet aircraft. Birds that live nearby these water sources will also be threatened and will migrate constantly due to aircraft noise and this will pose a significant risk to any airborne aircraft. After taking all of these new facts into consideration, it is our scientific assessment that the location of the proposed airport expansion is not suitable.

E. SUBMISSION ADDRESS

This appeal must be submitted to the Appeal Administrator at the address listed below within 20 days of being notified of the decision:

By post: Attention: Marius Venter
Western Cape Ministry of Local Government, Environmental Affairs &
Development Planning
Private Bag X9186, Cape Town, 8000; or

By facsimile: (021) 483 4174; or

By hand: Attention: Mr Marius Venter (Tel: 021-483 3721)
Room 809, 8th floor Utilitas Building
1 Dorp Street, Cape Town, 8000; or

By e-mail: DEADP.Appeals@westerncape.gov.za

Note: You are also requested to submit an electronic copy (Microsoft Word format) of the appeal and any supporting documents to the Appeal Administrator.



Appellant's signature

____ 14 November 2025
Date

Appeal letter against

THE PROPOSED EXPANSION OF THE EXISTING 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

EIA REFERENCE: 16/3/3/2/A5/20/2046/24

NEAS REFERENCE: WCP/EIA/0001497/2024

15 November 2025

Durbanville

Dear Mr. Marius Venter and Appeal Administrator

Noise pollution

We believe that the environmental impact of the proposed Cape Winelands Airport (CWA) has not been adequately addressed. For this reason, we oppose the intended development of the CWA as well as the rezoning of this area. Our concerns relate predominantly to the effect that noise pollution created by the proposed airport will have as well as other factors. We have previously outlined some of the detrimental effects that the airport will have on the health of residents of the area surrounding the airport. Additional information is provided in this document.

The Fisantekraal High School is situated approximately 1400 meters (m) from the planned airport runway and even closer to the planned airport. This exposes the school to significant health risks should the airport be built. According to Faiyetole et al 2019, residential areas should not be nearer than 4 kilometers (km) from a runway. Expanding the current runway will therefore be a violation of well accepted international practice which could lead to children being harmed. The significant health risks associated with airports are very well documented such as mental health problems such as fear, depression, frustration and increased blood pressure which are more frequent with exposure to noise above 60 decibel (dB) in the daytime and 45 dB at night. Learning difficulties are also a common phenomenon with children exposed to a noise level above 50 dB and have also been described as severely influencing children from concentrating and studying. (Faiyetole et al 2019, Wigatiningrum R et al 2021)

The international minimum safe distance from an airport to housings, residential areas or schools are 4 km. (Faiyetole et al 2019) The area should also be barrier free with a 4 km radius from the runway to protect aircraft when landing or taking off (Wigatiningrum R et al 2021). This is also to protect children from possible aircraft accidents, as were tragically recently seen in India and Louisville. Fisantekraal High School falls well within this distance (1400 meters) and therefore the health of children and adults will be at severe risk. Wigatiningrum et al states that activities that require more concentration such as working and studying will be disturbed by noise. The authors state that the performance or ability of

someone to complete his/her work will be decreased and slower when exposed to noise in the long term. This will therefore have a profound effect on the health, scholastic development and wellbeing of the children. The possible consideration to remove the children from their natural school due to excessive noise exposure could also have a profoundly negative impact on their wellbeing. The children and adults may also develop psychological and emotional disturbance.

Wigatiningrum et al also states that any distance less than 4 km from the airport are categorized as risky. They state that the closer the distance from housings to the airport, the greater the noise level will be. In their assessment of 'activities performances' they found that the dominant disturbance is felt when working and studying, and concentration during learning is also disturbed. They state that based on the International Civil Aviation Organization (ICAO) measurement, the longest disturbance occurred at a distance of 4 km.

There is sound attenuation due to spherical divergence, atmospheric absorption, and interference from ground reflections, which could impact on the observed noise by learners, teachers and residents. (Faiyetole et al 2019) Remarkably the predicted distance increase with decreasing noise level for each of the models fits. A distance of 3 km to the side of the flight paths calls for concerns. The authors further show that approximately 3.8 km distance is required for a 55 dB threshold for a noise abatement zone that requires aircraft to be higher than 1.5 km above the ground level before flying over residential areas. Faiyetole and coauthors report that the minimum safe distance to achieve a morning aircraft take-off noise level threshold of less than 45 dB for urban residents to ensure limited complaints or minimum potential health hazards, is about 3.6 km. The minimum safe distance increases to 3.64 km in the afternoon, and 4 km in the evening. The authors consider the minimum safe distance in the evening as a standard minimum for situating an airport away from residential houses, which would be 4 km. (Faiyetole et al 2019) The authors predict the minimum radial distance for the 40 dB, 45 dB and 50 dB thresholds. The minimum distance of approximately 3.60 km, 3.64 km and 4.04 km are thus predicted as the safe limits from the morning, afternoon and evening take-off data. (Faiyetole et al 2019) The researchers show that within 2.7 kilometers from the airport, all noise levels were above 78 dB. Please see the below graphs.

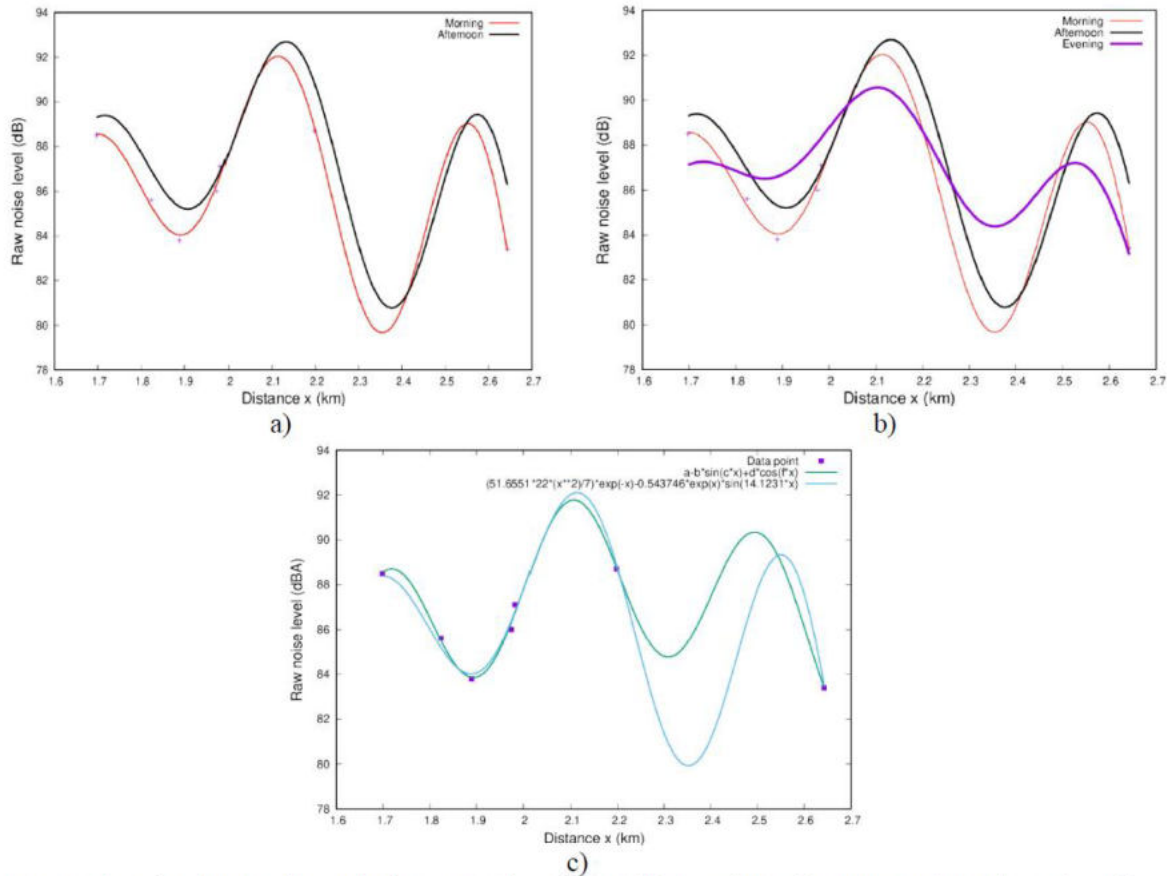


Fig. 2. Plots for a) morning and afternoon take-offs, and b) morning, afternoon and evening take-offs, c) comparison of the model functions in Eqs. (1) and (2) with the data for morning take-offs

Above graphs taken from: Faiyetole A et al, VIBROENGINEERING PROCEDIA. MARCH 2019, VOLUME 22

This data also corresponds well with the calculations made by an independent South African physicist, when using the following international **Inverse Square Law Formula** and Calculator.

The calculator below is used to calculate the sound pressure level at a specific distance of 1400 meters from the sound source at the airport.

The noise created by an airplane taking off is estimated at 140 dB. (Malouf WT et al, 2024) The effect on hearing as stated by Malouf et al is 'Immediate harm.'

The Inverse Square Law Formula is $V_2 = V_1 - 20 \cdot \log_{10}(d_2/d_1)$ and it is used to calculate the decibel level at the Fisantekraal High School which is situated approximately 1400 meters from the sound source at the CWA airport. $V_1 = 140\text{dB}$ at $d_1=10\text{m}$ and $d_2 = 1400\text{m}$ (<https://observablehq.com/@categorise/how-noise-travels-fast>)

$V_2 = 97.1 \text{ dB}$ at the Fisantekraal High School, which is 1400 meters away from the airport. The calculator used can be found at https://www.engineeringtoolbox.com/inverse-square-law-d_890.html. The sound pressure level at Fisantekraal High School (1400 meters from the airport) will be 97.1 dB

Realistically, a jet engine's volume is measured about 10 m away. With $d_1=10$ m, $V_2 = 97.1$ dB at the school, which is 1400 m away from the sound source. On average, the sound volume about 800 m away from the airport will be between 80-100 dB.

Permissible Distance under EHS (Environmental Health and Safety) Guidelines

The World Bank/IFC (International Finance Corporation) EHS Guidelines for Noise Management recommend limiting daytime noise levels at sensitive receptors (e.g., residences, schools) to 55 dB and nighttime levels to 45 dB. (<https://observablehq.com/@categorise/how-noise-travels-fast>) The perceived aircraft noise (97.1 dB) at Fisantekraal High School will therefore be well above the legally perceived noise levels and will therefore harm children and severely disturb their studying. The American Academy of Audiology (2010) states that noise levels of over 85 dB for extended periods can cause permanent hearing loss. Due to well recognized sound attenuating factors, e.g. temperature, wind direction, humidity and echoing from fixed structures, it is reasonable to expect decibel levels to surpass 97.1 dB at intervals, which could lead to permanent hearing loss in this subgroup of children at Fisantekraal High School. It is unsure if these noise risks have been thoroughly discussed with pupils, parents and staff at Fisantekraal High School, not even to mention the severely detrimental effect on concentration, studying ability and the performance and studies of music. In support of this calculation a study from Korea found that chronic exposure to noise from military airfields influenced the cognitive functions, thereby reducing the learning performance of Korean children. (Baek K et al 2023)

Mathematical models therefore proof undoubtedly that the sound impact at Fisantekraal High School will therefore reach levels of at least 97.1 dB when an aircraft takes off at the airport. This will make it impossible for children to function, study or thrive at Fisantekraal High School. Music education in particular will be impossible at this distance from the runway. Another academical institution which could also be negatively impacted by the proposed CWA development is the Durbanville High School, situated 10.67 km from the airport. The perceived noise as calculated by the Inverse Square Law Formula when aircraft take off at the proposed CWA, would be 60.6 dB at Durbanville High School, which is well above the international legal noise limit of 50 dB for schools. (Faiyetole et al 2019) These noise levels will influence the concentration levels of the students and will interfere with their studying. (Faiyetole et al 2019) Durbanville High School has one of the biggest music departments in the Western Cape and it is reasonable to assume that musical studies in particular will be negatively impacted due to perceived decibel levels above 50 dB. (Faiyetole et al 2019) Since the calculated decibel levels at Durbanville High School will exceed 60 dB, it is also reasonable to assume that there could also be associated health risks involved, even at a decibel level above 45 at night time. (Faiyetole et al 2019)

The impact studies mention that the Fisantekraal community will fall outside the 4 km impact zone, but do not mention that the Fisantekraal High School will fall directly within this impact zone according to distances calculated by means of Google Maps 2025. The airport's impact studies also do not mention at what decibel level a jet aircraft generally takes off, which is usually at a level of 140dB and causes immediate hearing harm (Malouf WT et al 2024) This will directly influence the perceived sound at Fisantekraal High School, which would according to international standards be well above the legal level of 50 dB for undisturbed studying. (Faiyetole et al 2019) There will also be associated health risks

involved for the group of students at Fisantekraal High School, since noise levels will exceed 60 dB. (Faiyetole et al 2019)

McKoy states that the distance someone could experience 45 dB of aircraft noise could reach out as far as 22 miles from a major airport. Sound could therefore also negatively influence many other schools in the Durbanville and surrounding areas with severe detrimental effects on the health and studies of children. (McKoy J et al 2024)

It is also documented that low-income populations are disproportionately exposed to aircraft noise. (Simon M et al 2022) This would unfortunately be a true prediction if the airports company is granted permission to build the airport in Fisantekraal. Simon et al states that this should provide valuable insight for local policy makers considering environmental justice issues.

Taking all the above factors into serious consideration we therefore strongly oppose the proposed plan to build and expand the proposed Cape Winelands Airport in the heart of the Western Cape Wine Country, since the community who will suffer the most because of this planned project would be the children of the Western Cape.

Other aspects regarding the impact of the planned CWA are now discussed.

Geographical Location (Measurements calculated according to Google Maps 2025)

Another important aspect of appeal against the expansion of the CWA is the location of the proposed airport. CWA is surrounded by several geographical mountainous elevations within close proximity of its planned runways. These locations include the Paarl Rock elevation [-33.73963073286203, 18.896754515611374] (14 km from runway), Simonsberg elevation [-33.8406836738251, 18.8825667556681] (14.5 km from runway), 'Kanonkop' elevation in Durbanville [-33.82034688631391, 18.592698735500765] (14.18 km from runway), Tygerberg Nature Reserve elevation [-33.8752199721784, 18.595710942888214] (16.5 km from runway), Klapmuts elevation [-33.82224089751027, 18.851811877059383] (11.17 km from runway) and Paardenberg elevation [-33.62885300157449, 18.79082044906599] (15.84 km from runway). These mountainous elevations could pose a significant risk to incoming and outgoing aircraft during adverse weather conditions. It is reasonable to assume that this must have been the major reason why the Allied Fisantekraal airport of 1943, was not expanded, but that another location (Cape Town International Airport) was rather sourced with minimal surrounding geographical mountainous elevations.

As a longtime resident of Durbanville I am well aware of the frequent severe fog conditions during winter, when these above-mentioned geographical mountainous elevations could pose a significant risk to aircraft, when flight paths may need to be altered and navigation between several of these beacons might become severely challenging when flying big passenger aircraft. The location of the airport could therefore also pose a risk to passengers and crew combined with the fact that the two airports (Cape Town International and CWA) are in such close proximity to each other (only 24 km). This could lead to a congested airspace with increased risk of collisions. This is also acknowledged by Royal Haskoning DHV

(Pty) (Ltd) who ‘found that the expanded CWA will impact airspace operations in the area, as well as neighbouring developments.’

It is interesting to note that other major world cities also have more than one airport, but not in such close proximity as is planned in the Western Cape. In London, Heathrow airport is situated 33.3 km from London City Airport; in Washington, Dulles International Airport is situated 36 km from Ronald Reagan Washington National Airport; in New York, John F Kennedy International Airport is situated 32 km from Newark Liberty International Airport; in Paris, Charles de Gaulle Airport is situated 34 km from Paris-Orly Airport (ORY); in Brussels, Brussels Airport (BRU) is situated 49 km from Brussels South Charleroi Airport (CRL) and in South Africa, OR Tambo International airport is situated 37.4 km from Lanseria International Airport. Other major cities with significantly bigger capacity than Cape Town only have one international airport to serve the community such as Berlin, Frankfurt, München, Barcelona, Copenhagen, Zurich and Vienna to mention a few. This raises serious questions regarding the need for a second international airport in the Cape Town area.

Critically Endangered indigenous vegetation

It is mentioned in the development proposal that the construction will include the clearance of more than 300m² of critically endangered indigenous vegetation. The national guidelines are very clear in nature conservation areas and in the Western Cape that critically endangered vegetation may not be removed. The airport development will therefore harm indigenous vegetation and precious agricultural land and it is therefore not suitable to expand the airport in this location due to its negative impact on the environment.

Birdlife

Point 42.4 of the environmental authorization states the following: ‘The exposed water surface area of the rehabilitated quarry must be suitably covered, as far as possible, in order to mitigate the attraction of birdlife and suitable vegetation must be planted on either side of the ponds to discourage bird movement between ponds.’ These rules have been advised to try to mitigate the risks of bird strikes in close proximity to the planned CWA. A study of water sources in close approximation to the airport has been made (Google maps 2025), and 5 very big sources were found. They are listed below.

1. [-33.77692704607007, 18.759690918678686] Water source 290X600 m situated 1200 m from airport.
2. [-33.77498864905356, 18.750250547170847] Water source 70X100 m situated 353 m from airport.
3. [-33.77770108595355, 18.753745716795297] Water source 100X180 m situated 765 m from airport.
4. [-33.75589838666833, 18.732505312090396] Water source 170X50 m situated 500 m from airport.
5. [-33.76054266050489, 18.74190640464555] Water source 78X81 m situated 437 m from airport.

Durbanville has always been a bird sanctuary and these water sources have been crucial in maintaining the natural birdlife in this area. It would certainly not be possible to cover such vast amounts of water to try and mitigate and reduce the movement of birds and in the process natural habitat will be destroyed. No vegetation planted on the sides of these 'lakes' would be able to prevent birds from migrating over lakes or from one source to the other, according to their natural instincts and habitat. Looking at the vast quantities of water in close approximation to the proposed airport expansion, it is reasonable to assume on scientific and factual grounds, that birdlife in this area will pose a significant threat to any jet propelled aircraft. This will inevitably pose a significant risk to both passengers and residents. The impact assessment states that there is a primary bird hazard zone surrounding the airport site which is attributed to the agricultural land use and water bodies. This attributes to the abundance and presence of high risk bird species which may collide with an aircraft. The impact study clearly states that there is a risk for bird strikes, a risk in my opinion which is not worth taking.

The impact assessment also states that ICAO guidelines for bird strikes include the consideration of a 13km radius around the site, which needs to be investigated for a source of birds. The above mentioned water sources, which attracts most species of birds, falls well within this impact zone.

As mentioned in the environmental authorization, the famous national bird of South Africa namely the Blue crane bird (*Grus paradiseus*), 'which particularly favours the on-site cultivated fields' adjacent to the airport, will be severely negatively impacted. Many other indigenous bird species will also be threatened by the proposed development and these birds will unfortunately also pose a significant risk to aircraft safety. These facts again accentuate the unsuitability of this area for an airport expansion.

Sustainability and Climate change

The impact studies state that the total emissions for the airport by 2050 are estimated at 5.3 million tons of carbon dioxide equivalent, which is mentioned as a medium impact in the environmental authorization. A Google AI overview though states differently, that it is considered a very high amount and comparable to the annual emissions of a large industrial facility or a small city. This will have a severely detrimental impact on the Western Cape Winelands, and therefore internationally there is a strong drive to reduce long haul flights and to build fewer airports. The same principles of reducing our emissions should also be applicable to South Africa, according to COP30.

Taking all the above-mentioned factors into careful consideration we therefore strongly oppose the proposed expansion of the Cape Winelands Airport on scientific merits, due to the unsuitability of the location.

Yours sincerely



Leonard G Heydenrych

MBChB, DFFP (Lond), PGDip (RCM, Lond), MMUS (TCM, Lond), FCOphth (SA), FRCOphth (Lond), MMed (UCT), Cornea Fellowship (Moorfields, Lond)

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6. McKoy J, Airplane Noise May Be Bad for Your Health, The Brink, Boston University Public Health, June 4, 2024
7. Simon M, Hart J, Levy J et al; Sociodemographic Patterns of Exposure to Civil Aircraft Noise in the United States; Environmental Health Perspectives, Feb 2022, Vol 130, Issue 2

Statement

15 November 2025

Durbanville

I, Leonard G Heydenrych, a registered, affected and interested party, hereby confirm that a copy of my appeal, including supporting documentation, was submitted to the applicant on 15 November 2025, within 20 days of the decision granted by the Western Cape Government.

Yours sincerely

A handwritten signature in cursive script, reading "L. G. Heydenrych". The ink is grey and the signature is written on a white background.

Leonard G Heydenrych

MBChB, DFFP (Lond), PGDip (RCM, Lond), MMUS (TCM, Lond), FCOphth (SA), FRCOphth (Lond), MMed (UCT), Cornea Fellowship (Moorfields, Lond)

11/12/2024

PHS Consulting

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Cape Winelands Airport Extension

We are concerned about the proposed extension of the Cape Winelands Airport. This development will be close to the established densely populated Durbanville community. The development of the airport to accommodate high volumes of large passenger aircraft will have a profoundly negative impact on the health and well-being of all residents in Durbanville and surrounding areas.

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

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

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

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

effect on hearing over the years.

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

Air pollution is increased by both the air traffic and the increase of motor vehicle traffic (Bendtsen 2021). Increased ultrafine particles have been detected 40km from a large airport. Exposure to diesel fumes (due to air traffic and vehicular traffic) and petrol (due to increased vehicular traffic) will also increase. This pollution will increase respiratory disease in Durbanville residents. The Western Cape is already battling with a very high incidence of Tuberculosis and an increased burden of air pollution in the area could increase the incidence of Tuberculosis, which South Africa cannot afford. (Van der Walt 2018, Feng 2022, Xiang 2021)

We believe that due to these detrimental effects on the health and well-being of the residents of Durbanville the planned Cape Winelands Airport extension should be reconsidered. Further, the Durbanville community should be fully informed about the potential negative effects on their health and well-being that the proposed extension will have. We therefore also request an extension of the deadline for public comments.

Dr L Heydenrych, Durbanville, flutedr@gmail.com

MBChB, FCOphth (SA), MMed (Ophth), DFFP (Lond), FRCOphth (Lond)

A handwritten signature in cursive script, reading 'L. G. Heydenrych'.

Prof. Leon Janse van Rensburg, Durbanville

MBBCh, M.Fam.Med, MMed(RadD), EDiNR, D.Sc

Leon Janse van Rensburg

A handwritten signature in black ink, appearing to read 'E. D. Nel', with a stylized flourish above the name.

Dr E D Nel, Durbanville

MBChB; MMED (Paed); BSc Hons (Epidemiology)

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Impact on Hearing References

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

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This study highlights the elevated hearing thresholds in individuals exposed to high-intensity aircraft noise. Chronic exposure in military and ground staff resulted in significant noise-induced hearing loss.

10. Van Kempen, E., et al. (2023). Health Impacts of Noise Exposure: Aircraft and Beyond. This research explores the effects of environmental noise exposure, including aircraft noise, on hearing and broader health outcomes. Regular exposure to levels exceeding 85 dB was linked to hearing impairment.

12/12/2024

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

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

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

A part of the training of school children at Durbanville High School involves outdoor performances with the Durbanville High School Orchestra wind band, in particular at wine farms in the area and school playgrounds. The whole Durbanville environment has become the training ground for this exceptional musical establishment. 'Noise nuisance' from an airport will severely hinder this form of education since students require silence to concentrate, perform or study music or academics without any hindrance.

Durbanville High School is regarded in high esteem internationally as a music institution and any form of noise hindrance by an airport preventing music teaching and music education, will be seen in an extremely negative light internationally.

I believe that due to these detrimental effects on the music department and orchestral training at Durbanville High School and other schools in close proximity to the airport, the planned Cape Winelands

Airport extension should be reconsidered. Further, the Durbanville community should be fully informed about the potential negative effects on music education that the proposed extension will have. I therefore also request an extension of the deadline for public comments.

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1. Basner M, Clark C, Hansell A, Hileman JI, Janssen S, Shepherd K, et al. Aviation Noise Impacts: State of the Science. *Noise & Health*. 2017;19(87):41-50
2. Leylekian L, Covrig A, Maximova A. Aviation Noise Impact Management, Technologies, Regulations, and Societal Well-being in Europe, Springer Books, 2020

Dr. Leonard Heydenrych

MBChB, DFFP (Lond), FCOphth (SA), MMed (Ophth), FRCOphth (Lond), PGDip (Royal College of Music), MMus (Trinity College of Music)

A handwritten signature in cursive script, reading "L. G. Heydenrych". The ink is grey and the signature is positioned in the lower-left area of the page.

11/12/2024

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effect on hearing over the years.

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

Air pollution is increased by both the air traffic and the increase of motor vehicle traffic (Bendtsen 2021). Increased ultrafine particles have been detected 40km from a large airport. Exposure to diesel fumes (due to air traffic and vehicular traffic) and petrol (due to increased vehicular traffic) will also increase. This pollution will increase respiratory disease in Durbanville residents. The Western Cape is already battling with a very high incidence of Tuberculosis and an increased burden of air pollution in the area could increase the incidence of Tuberculosis, which South Africa cannot afford. (Van der Walt 2018, Feng 2022, Xiang 2021)

We believe that due to these detrimental effects on the health and well-being of the residents of Durbanville the planned Cape Winelands Airport extension should be reconsidered. Further, the Durbanville community should be fully informed about the potential negative effects on their health and well-being that the proposed extension will have. We therefore also request an extension of the deadline for public comments.

Dr L Heydenrych, Durbanville, flutedr@gmail.com

MBChB, FCOphth (SA), MMed (Ophth), DFFP (Lond), FRCOphth (Lond)

A handwritten signature in cursive script, reading 'L. G. Heydenrych'.

Prof. Leon Janse van Rensburg, Durbanville

MBBCh, M.Fam.Med, MMed(RadD), EDiNR, D.Sc

Leon Janse van Rensburg

A handwritten signature in black ink, appearing to read 'E. D. Nel', with a stylized flourish above the name.

Dr E D Nel, Durbanville

MBChB; MMED (Paed); BSc Hons (Epidemiology)

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Predicting the aircraft take-off noise level

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Abstract. We propose a model function for aircraft take-off noise prediction with distances radially from a runway. The nonlinear model function reveals four main parameters contributing to the effective strength of aircraft take-off noise over distance. A numerical solution of the model function is used to predict the minimum safe distances for residential locations. We infer that residential locations could not be situated within a 4 km radial distance of an airport to avoid regular exposure to above 45 dBA noise levels at night.

Keywords: attenuation factor, noise level per unit area, characteristic wavenumber, modulated amplitude.

1. Introduction

The impacts of aircraft noise on people and properties in the environs where an airport is situated cannot be overemphasized. Aircraft noise is a major irritant causing a myriad of health issues, psychological, functional and physiological disturbances [1, 2]. These health issues including the annoyance have been studied [3, 4]. Mental health problems such as fear, depression, frustration [5, 6], and increased blood pressure are more frequent with exposure to noise above 60 dBA in the daytime and 45 dBA at night [7, 8]. Learning difficulties are also a common phenomenon with children exposed to noise level above 50 dBA [9]. Although there are huge economic and social benefits attributable to air transportation the negative externalities, which include also the air pollutants, mobility gap, and accidents, cannot be overemphasized. Aircraft noise being one of the most important environmental problem associated with civil aviation [10], is intricately linked with aircraft propulsion systems as well as the atmospheric conditions [11]. Murtala Muhammed International Airport (MMIA) in Lagos, Nigeria, is a classic example of an airport that has fully merged with its surrounding residential and city central business area. We aim to provide a model that could predict the noise level from the airport and to possibly predict a safe zone away from any new airport location.

2. Methodology

The main source of the aircraft noise is assumed to be from its propulsion system. There are also the recurrent background noises from surrounding activities. We assumed that there is sound attenuation due to spherical divergence, atmospheric absorption, and interference from ground reflections, which could impact on the observed noise. Thus, the perceived noise level (PNL) is essentially different from the effective perceived noise level (EPNL) [11]. With these assumptions, aircraft noise levels in A-weighted decibels (dBA) during take-offs were logged down with corresponding distances from the runway which serves as a 3 km radius point that covers both aircraft flight paths and tangential points. A Digital Sound Level Meter AS804 with a frequency range from 31.5 Hz to 8.5 kHz and measuring level from 30 to 130 dBA with an accuracy of ± 1.5 dB was used. These readings were taken during morning, afternoon and

evening departure flights, from MMIA in Lagos, Nigeria, in reference to runway 18 Right (18R) meant for international flights.

3. Results: the nonlinear model function

We use the nonlinear regression analysis to derive the model function. Relying on the basic physics of the sound propagation, we assume an initial sinusoidal plus an exponentially decaying function. Following the standard practice [12] a nonlinear model of the form:

$$F(x) = bAe^{-ax} + de^x \sin(cx), \quad (1)$$

was derived for the noise level at a distance x from the runway. The first term represents a decaying noise level with strength parameter ' b ' taken as the noise level per unit area $A = \pi x^2$ (i.e. the circular area with radius taken as the measured distance x from the runway), with unit dBA/km². The parameter ' a ' is taken as the attenuation factor resulting from external physical or environmental factor and measured as decibels per km (dBAkm⁻¹). The second term accounts for the sinusoidal base function with modulated amplitude parameter ' d ' and a characteristic wavenumber ' c '. We assume the disturbances for each of the data set are independent so that the raw noise data can be used for the parameter estimation. This also allows the use of a few numbers of parameters and a least square technique to estimate the best parameter set. We use a standard plotting package equipped with nonlinear least-square fits based on the Levenberg-Marquardt method [12, 13]. An initial fit reveals a near constant value $a = 1$ dBA/km with very small uncertainty. With parameter ' a ' fixed, the best fit values for the parameters b , c , and d , together with their respective standard errors, for the morning, afternoon and evening readings are listed in Table 1. The parameters for the different time frame show a striking agreement within the quoted asymptotic standard errors (ASE). The good agreement is indicative of the degree of reliability of our noise model function. We see that the morning data are of higher integrity with respect to our model function, followed by the afternoon and the evening data. This is further supported by the measure of the goodness-of-fit obtained for each and Fig. 1.

The aircraft noise levels during morning take-offs shows a perfect correlation between the attenuation factor ' a ' and the strength of the decaying noise level ' b '. The wavenumber ' c ', with a value of approximately 14 km⁻¹ is moderately correlated while the amplitude ' d ' is seen to be poorly correlated with the parameters ' a ' and ' b '. The plot of the noise level against distances from the runway shown in Fig. 1(a) shows a near perfect fit to the data points. The results for afternoon take-offs show a striking resemblance to the morning take-offs, parameter-wise, as revealed in Table 1. All the parameters take approximately the same values as for the morning result except ' d ' with a value of -0.50 dBA. The correlations between the parameters are similar as for the morning take-offs. The fitted function is equally satisfactory as shown in Fig. 1(b). The data plot shown in Fig. 1(c), for the evening data, is at significant variance with Figs. 1(a) and 1(b) representing morning and afternoon take-offs respectively. The functional fit to the data points is clearly poor compared to the ones earlier discussed. This is supported by the percentage asymptotic standard error for the parameter ' d '. This trend is reflected in the parameter correlations. A somewhat simpler function may be derived using the Fourier series. Such a function is however associated with more parameters and sometimes loss of the physical imports. For our consideration we also obtain the best fit using the:

$$F(x) = a - b \sin(cx) + d \cos(fx), \quad (2)$$

where the parameters a , b and d may respectively be taken as the noise strength and the amplitudes in dBA while c and f are the corresponding wave numbers calculated in per kilometers. For example, the best fit parameter for the Morning take off data are: $a = 74.1031 \pm 1.6980$ dBA, $b = -3.4260 \pm 0.2802$ dBA, $d = -14.3289 \pm 1.9280$ dBA,

$c = 15.6808 \pm 0.0296 \text{ km}^{-1}$, and $f = 1.4421 \pm 0.0141 \text{ km}^{-1}$. This is compared with the best fit of Eq. (1) in Fig. 2(c). Even though the two functions give comparable fit to the data we see that their differences clearly manifest in the long distance range.

Table 1. Best fit values for the parameters of the nonlinear model function.
Note that parameter $a = 1 \text{ dBakm}^{-1}$

	Morning		Afternoon		Evening	
Parameter		ASE		ASE		ASE
b	51.6551	+/-0.0913 (0.18 %)	52.1962	+/-0.3352 (0.64 %)	52.0684	+/-0.5903 (1.14%)
c	14.1119	+/-0.0199 (0.14 %)	13.9874	+/-0.1110 (0.79%)	14.1044	+/-0.3002 (2.13 %)
d	-0.5437	+/-0.0407 (7.48 %)	-0.5063	+/-0.1338 (26.44 %)	-0.2471	+/-0.2629 (106 %)

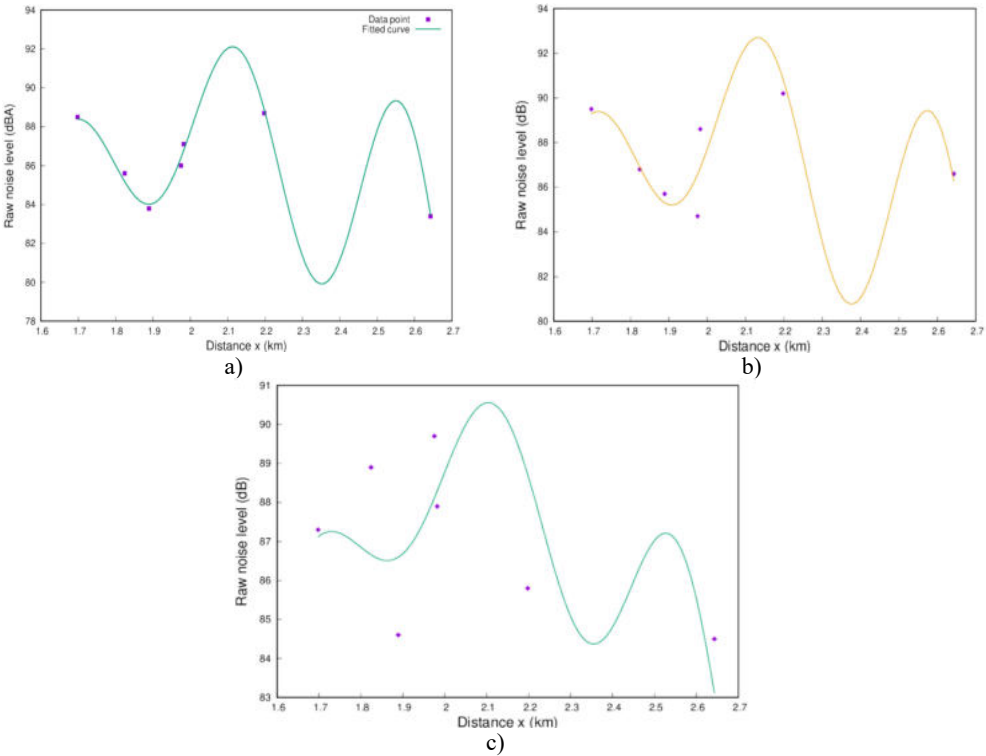


Fig. 1. Fitted plot of the raw data for the a) morning take-off, b) afternoon, c) evening data

4. Discussion

Our results show a noise model function characterized by a noise level that slowly dissipates with distance. The noise level which grows quadratically with the radial distance from the runway is attenuated exponentially by some physical factors over the radial distance. The sinusoidal propagation over the spatial distance in the atmospheric medium is characteristic of the sound waves. The parameter ' b ' is understood as the predicted noise strength at the radial distances corresponding to or larger than that of the minimum circular area around the source point. The overall effect of both components of the model function is a shifted sinusoidal wave function with varying amplitude and whose peak-to-peak strength is defined by the noise strength per unit area and the attenuation factor. We note that this is only defined for a radial distance greater than or equal to the closest distance of measure to the runway corresponding to a minimum circular area. Thus, the model function cannot be used to estimate the maximum noise generated at the source point but may be used to infer the extent to which the noise level is within the required threshold.

4.1. Relative behavior of the take-off parameter fits

A superimposed data plots in Fig. 2 show a clear pattern of a sinusoidal waveform characteristic of sound waves. Given the external physical factors, the aircraft raw noise level strength during morning take-off flights, assuming all other things being equal, would be lower than it would be in the afternoon due to the temperature difference. Similarly, the noise propagation is also expected to be slower in the morning than for the afternoon. This is supported by the plots in Fig. 2(a), where the crest points for morning noise level at different distances are not only lower than for the afternoon but also lags behind when the temperature of the surrounding area was significantly higher than in the morning time. The same explanation holds for the trough point. In addition, the afternoon noise level is further enhanced by the possible increase in the background noise due to the increased human activities and other forms of transportation within the environment of the airport.

In Fig. 2(b) the evening plot is at significant variance with morning and afternoon data plots. This is understood as the effect of the sharp drop in both the temperature and the background noise level in the evening. Fig. 2(c) shows the comparison of both model functions of Eqs. (1) and (2) with respect to the experimental data points.

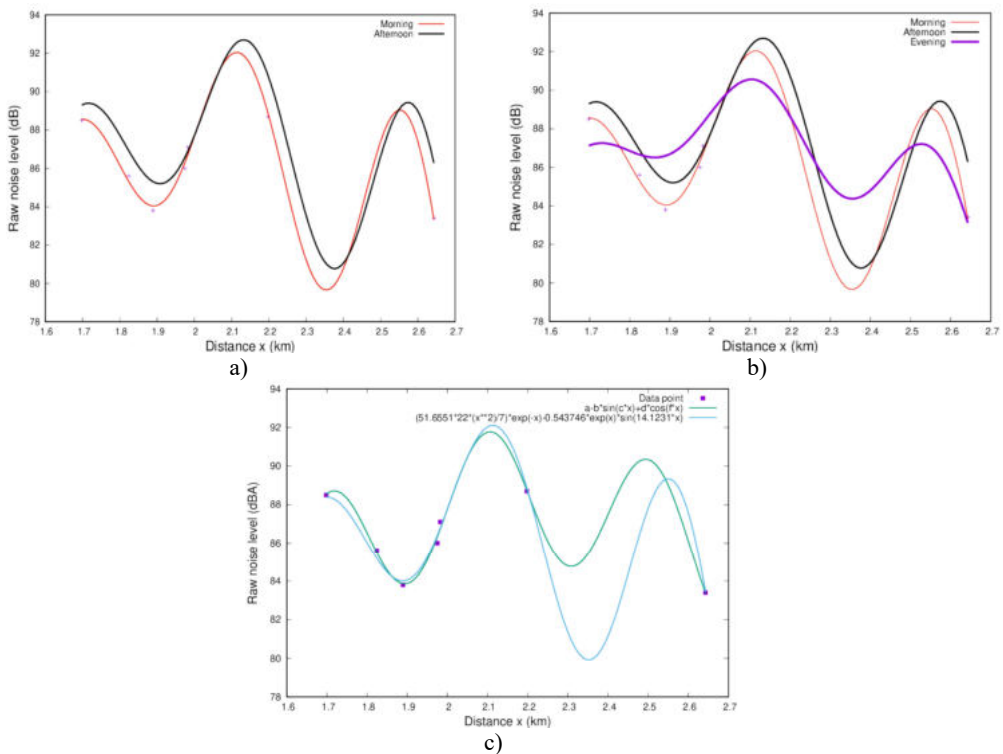


Fig. 2. Plots for a) morning and afternoon take-offs, and b) morning, afternoon and evening take-offs, c) comparison of the model functions in Eqs. (1) and (2) with the data for morning take-offs

4.2. Prediction of the minimum distance for noise thresholds

The negative health effects of aircraft noise levels from proximate locations to airports become pronounced around the world. Residential land use should, therefore, be planned and situated with thorough considerations of airport noise and its potential risks [11]. Consideration for a safe distance between residential zones and airport locations is thus necessary. Numerical solution of the model function is used to predict the minimum distance for the locations of residential

buildings or public institutions from the airport using the thresholds from earlier studies [6]. We predict the minimum radial distance for the 40 dBA, 45 dBA and 50 dBA thresholds. The minimum distance of approximately 3.60 km, 3.64 km and 4.04 km are thus predicted as the safe limits from the morning, afternoon and evening take-off data. Remarkably the predicted distance increase with decreasing noise level for each of the models fits. The trend of the predicted values shows increasing distance for a fixed noise threshold from the morning to evening model fits. Urban residents could actually receive up to 45 dBA of noise without complaint, while it is 40 dBA (suburban residents) and lower at 35 dBA for rural residents. In fact [14] show that a distance of 3 km to the side of the flight paths calls for concerns. The authors further show that approximately 3.8 km distance is required for a 55 dBA thresholds for a noise abatement zone that requires aircraft to be higher than 1.5 km above the ground level before flying residential areas.

5. Conclusion

This paper shows that the minimum safe distance from a morning aircraft take-off noise level of about 45 dBA thresholds for urban residents with limited complaints or minimum potential health hazard is about 3.6 km. The minimum safe distance increases to 3.64 km in the afternoon, and 4 km in the evening. We consider the minimum safe distance in the evening as a standard minimum for situating airport away from residential houses. We conclude that our proposed model function for aircraft take-off noise prediction with distances radially from a runway could be used to predict safe distance for different aircraft noise levels and thresholds. Further studies which effectively capture information of the aircrafts and flight pattern and paths is expected to provide a more robust predictive model.

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Effect of distance of housing to airport on noise disturbances level (case: housing around Soekarno-Hatta International Airport)

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Effect of distance of housing to airport on noise disturbances level (case: housing around Soekarno-Hatta International Airport)

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Abstract. This study aims to identify the effect of distance of housing to the airport on the level of noise disturbance. The airport is an area of land or water with certain boundaries that used as a place to landing and take-off. As a vital and dynamic object, the airport's surrounding has to accommodate its future developments and keep secure by keeping away from residential areas. And vice versa, for the convenience of its residents, these housings need to be regulated at a minimum distance from the airport. Its residents will be affected by noise due to aircraft traffic activity. Noise is unwanted sound at a certain level and time causing interference. Soekarno-Hatta International Airport was chosen considering the high intensity of aircraft traffic with large aircraft dimensions and high noise interference. Dimensions of noise disorders studied include physical disorders, communication disorders, sleep disorders, disruption of activity, and emotional disorders. This research is quantitative using a survey-questionnaire method. The number of samples was determined using the Lemeshow formula of 96 respondents. The results show that the effect of distance on the noise disturbance level for all the dimensions mentioned above is significant. This result emphasizes the need for a minimum distance limitation between housing and the airport.

1. Introduction

Housing grows along with population growth. This condition is shown by the growth of housing in vulnerable areas around airports. Residential areas are often very close to the aircraft runway [1]. The proximity of the housing area around the airport will cause noise disturbance due to aircraft activities as an undesirable side effect of aircraft operations. Active airports usually tend to increase the frequency of aircraft flights every year. As this flight frequency increases, it will also result in high levels of noise at airports. Continual exposure to noise from various activities in the airport environment can result in physiological and psychological disorders in humans [2]. Based on the distance of the housing area to the airport, this study aims to identify the effect of the distance of the housing area to the airport on the perception of noise disturbance levels.

Noise is an unwanted sound in an activity at a certain level and time because it causes interference. The sources of noise include moving vehicles such as airplanes. The source of noise due to flight activity is a dynamic noise. The type of noise due to flight activity is an intermittent noise. Aircraft noise is produced from four sources, namely the propeller, aerodynamic, engine exhaust, and engine



vibration [3]. Aircraft noise is considered an important source of noise pollution the negatively impact resident around airport [4]. The level of noise perceived by a person is directly proportional to the distance to the noise source. The closer to the noise source, the greater the noise level will be. Based on the noise level quality standard, the allotment of housing areas and settlements has a maximum limitation of 55 dB [5].

The disturbance is a state of displeasure that is experienced or happening to someone. Noise disturbance can affect humans, both in the short and long term. The effects of noise are categorized into two, namely auditory and non-auditory [6].

The auditory system is a system that is responsible for the sense of hearing. The auditory effect is an influence on hearing-related health such as decreased sensitivity to sounds or noises, for example, reduced or loss of the hearing ability of a person [7]. Examples of hearing disruptions due to airplane activities are buzzing ears and headaches. Meanwhile, non-auditory disruptions are as follows.

- **Communication Disruption**

Noise exposure can reduce a person's ability to communicate. Communication problems such as difficulties in conversation due to aircraft noise interruption. Noise can cause an interruption in outdoor conversation or communication. Communication disorders might cause misunderstandings and decrease the quality of information conveyed to the listener or the interlocutor [8]. Communication disruption being linked to activity disturbance can cause a loss of focus.

- **Sleeping Disruption**

Laszlo [9] qualitatively reviewed 41 papers on human reactions to environmental noise exposure changes, showing that the most common outcomes investigated were sleep disturbance. Sleeping time disruption is a concern, especially for people who are exposed to aircraft noise at night. The effect of noise during a sleeping time in the form of sleep difficulties (insomnia), easily awakened from sleep, and low-quality rest [10]. Exposure to noise can reduce sleep quality and create minimum sleep duration at night, which will have an impact on concentration disturbance and reduced energy for several days. For these reasons, noise-induced sleep disturbance is considered the most deleterious non-auditory effect of environmental noise exposure [11].

- **Activity Disturbance**

The influence of noise experienced by a person can lead to concentration disorder that would reduce productivity in their activities. Activities that require more concentration such as working and studying will be disturbed by noise [12]. The ability or performance of someone in completing their work will be decreased and slower when exposed to noise on a long term [13].

- **Psychological and Emotional Disturbance**

Noise can cause psychological disorders on a person. Psychological disorders are a form of emotional expression [14]. Psychological disorders can include irritation, shock, irritability, fatigue, and low quality of concentration. Irritation is someone's subjective reaction which is often reported as a response to environmental noise. Furthermore, emotional conditions can affect activities carried out by the person.

Noise Area Limitation around Soekarno-Hatta International Airport, noise limitation area is categorized into three areas [15].

- **Noise Area Level I**

In this area, the airplane noise index is at $70 \leq \text{WECPNL} < 75$. Land and space in this area are utilized from various kinds of activities and/or buildings, except school and hospital.

- **Noise Area Level II**

In this area, the airplane noise index is at $75 \leq \text{WECPNL} < 80$. The land and space in this area are utilized for various kinds of activities and/or buildings, except for schools, hospitals, and housings. Schools, hospitals, and housings should be fitted with noise insulation.

- Noise Area Level III

In this area, the airplane noise index is at WECPNL ≥ 80 . The land and space in this area are utilized to build airport buildings or facilities fitted with noise insulation. Besides that, this area is also utilized as a green area or environmental control facility.

The airport layout is spatial that relates to the aviation operational space, which is the layout of aviation safety that has been regulated by the ICAO standard (International Civil Aviation Organization). This standard is the recommendation implementation applied in the aviation world. Where the environmental area around the airport is barrier-free for aircraft to take off, landing, and holding is at a radius of 0-4000 meters. In this standard, there is a measurement of noise disturbance level, which is measured at a distance of 300 meters parallel to the runway, as well as 1000 meters, 2000 meters, 3000 meters, and 4000 meters from the runway.

2. Research methodology

This research is categorized as quantitative research. The analysis units are the individual housing residents around Soekarno-Hatta International airport. In measuring the effect of housing distance to the airport on the perception of the level of noise disturbance, the survey-questionnaire method was used. The time of research is April to May 2020. Respondents of 96 people were determined by using the Lemeshow formula because the total population is unknown. Assuming $p=0.5$ with a 95% confidence level and Z value at $1-\alpha/2$ with a confidence level of $\alpha=0.05$, the result is 1.96 which means that 96 samples are needed.

The questionnaire as a measurement tool is directed to obtain data such as distances from housing to airport and perception on noise disturbance level. Housing around Soekarno-Hatta International Airport was chosen because this airport has dense flight activities and surrounded by numbers of complex housings around it.

3. Results and discussion

3.1. Distance from housings to airport

According to the result, obtained distribution of distance from housings to the airport. To know the location of residents affected by noise disturbance. The closest distance from housings to the airport is 300 meters, meanwhile, the longest distance is 9.8 kilometres with a distribution as shown in Table 1.

Table 1. Distribution of distance from housings to airport.

Distance from housings to airport	Number of Respondents	Percentage (%)
< 1 km	11	11%
1 – 2 km	21	22%
2 – 3 km	13	14%
3 – 4 km	12	13%
>4 km	39	40%
Total	96	100%

The majority of distances from housings to the airport are at a distance of >4 km with a percentage of 40%. Based on the International Civil Aviation Organization (ICAO) measurement, the longest disturbance occurred at a distance of 4 kilometres. In the study area, 60% of the respondent is categorized as risky because their distance from the airport is less than 4 kilometres. The closer to the distance from housings to the airport, the greater the noise level will be.

3.2. Perception on noise disturbance level

Perception is an individual subjective valuation based on their feelings. Perception is one aspect for humans in responding to the various phenomena surrounding it. Each individual has a different perception. Perception of disturbance includes physical condition, communication disturbance, sleeping disorders, activity disturbance, and emotional condition disorders. For more details see Table 2.

Table 2. Perception on noise disturbance.

Variables	Statements	Affirmation	Neutral	Disagreement
		Score (%)		
Disturbance on Physical Condition	Buzzing Ear	55.2	28.1	16.7
	Lower Hearing Ability	18.8	37.5	43.8
	Headache	15.6	31.3	53.1
Communication Disturbance	Difficulty to hear interlocutor	68.8	19.8	11.5
	Difficulty to obtain information out of a conversation	72.9	15.6	11.5
	Loudening voice when talking	76.0	10.4	13.5
Disturbance during Sleeping/Resting time	Disturbed when sleeping	36.5	34.4	29.2
	Often awoken during sleeping	34.4	32.3	33.3
	Unable to rest comfortably during the day	24.0	27.1	49.0
Disturbance during activity performance (Working/Studying)	Disturbed during working	36.0	40.0	24.0
	Disturbed during studying	58.7	23.9	17.4
	Disturbed working concentration	38.0	44.0	18.0
Emotional Condition Disturbance	Disturbed studying concentration	52.2	21.7	26.1
	Feeling upset	38.5	29.2	32.3
	Easily angry	7.3	29.2	63.5
	Feeling shocked	41.7	18.8	39.6

The most prominent disorders on the physical condition are buzzing ears (55.2%). Communication disturbance occurs on every indicator. The majority of disturbance during sleeping/resting time occurs in the form of feeling disturbed when sleeping (36.5%) and often awoken during sleeping (34.4%). During activities performances, the dominant disturbance is felt when working and studying, concentration during learning is also disturbed. As for emotional conditions disturbance, it occurs in the form of feeling upset (38.5%) and shocked (41.7%).

4. Analysis and discussion

4.1. Noise disturbance level perception

Perception is an individual subjective valuation towards a condition. Perception of noise disturbance level is classified in 3 classes, namely high, medium, and low. Perception of noise disturbance is shown in Table 3.

Table 3. Noise disturbance level perception.

Percentage of Noise Disturbance Level (%)		Interval
High	25,0	High (1) = 21-35
Medium	63,5	Medium (2) = 36-50
Low	11,5	Low (3) = 51-63

Based on Table 3 noise disturbance level perceived by housings residents around Soekarno-Hatta International Airport is at a medium level. This condition is caused by the existence of residential adaptation efforts with the environment around the airport. Most of the perception of noise disturbance by the residents around the Soekarno-Hatta International Airport.

4.2. *The impact of housing distance to the airport on noise disturbance level perception*

The perception of noise disturbance level in settlements is influenced by many things, one of the distances of settlements to the airport. Seeing the development of the region, especially the settlements around Soekarno-Hatta International Airport, this allows the influence of the perceived inhabitants of the surrounding airports. Statistical test result on the impact of housing distance to the airport on noise disturbance level perception is significant as shown in Table 4. **This result shows that the distance from housing to the airport influences perceived disturbance received** by housing residents around Soekarno-Hatta International Airport.

Table 4. Impact of distance on noise disturbance level perception.

Noise Disturbance Perception	Significance Value
Disturbance on Physical Condition	0.000
Disturbance during Communication	
Disturbance during Sleeping/Resting	
Disturbance during Activity	
Performances (working/studying)	
Disturbance on Emotional Condition	

An airport is a vital object. To accommodate its development, a regulation to manage housing distance from it is required. Based on noise regulation of the Soekarno-Hatta International Airport are based on the **ICAO standard**, we can see numbers of housings. The existence of these housings will affect the noise disturbance level perceived by the residents. The environmental area around the airport is barrier-free for aircraft to take off, landing, and holding. The existence of these housings will affect the noise disturbance level perceived by the residents. Because of that, a decision regarding housing area management based environmental area around the airport.

5. Conclusion

The growth of housing around the airport affects the noise disturbance of the residents of the housing. There is a significant influence of housing distance to the airport towards noise level perception. The closer the distance from housing to the airport, the higher noise disturbance level perceived by the residents will be. The experienced noise disturbance level includes physical condition disorders such as buzzing ears, communication disturbance, activity disturbance, and emotional condition disturbance. **Based on that, an affirmation of minimum distance limitation and housing area management around the airport is highly required.**

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LEVELS OF NOISE In decibels (dB)

4

PAINFUL & DANGEROUS		
Use hearing protection or avoid	140	• Fireworks • Gun shots • Custom car stereos (at full volume)
	130	• Jackhammers • Ambulances
UNCOMFORTABLE		
Dangerous over 30 seconds	120	• Jet planes (during take off)
VERY LOUD		
Dangerous over 30 minutes	110	• Concerts (any genre of music) • Car horns • Sporting events
	100	• Snowmobiles • MP3 players (at full volume)
	90	• Lawnmowers • Power tools • Blenders • Hair dryers
Over 85 dB for extended periods can cause permanent hearing loss.		
LOUD		
	80	• Alarm clocks
	70	• Traffic • Vacuums
MODERATE		
	60	• Normal conversation • Dishwashers
	50	• Moderate rainfall
SOFT		
	40	• Quiet library
	30	• Whisper
FAINT		
	20	• Leaves rustling

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The Impact of Aircraft Noise on the Cognitive Function of Elementary School Students in Korea

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Abstract

Background:

This study evaluated the effects of chronic exposure to aircraft noise on the cognitive functions of Korean elementary school students attending an elementary school around a military airfield and clarified the relationship between noise exposure and cognitive functions.

Methods:

Five schools with average weight equivalent continuous perceived noise levels (WECPNL) of ≥ 75 dB were selected from four regions in Korea. Each of these schools was matched with a non-exposed school. The Korean Intelligence Test Primary (KIT-P) was used to measure the scores of four subcategories and the intelligence quotient (IQ). The noise exposure groups were divided into high-exposure (WECPNL ≥ 80 dB) and medium-exposure ($75 \leq \text{WECPNL} < 80$) groups. The period of

exposure during the school year was collected. A linear mixed model, with matched pairs of schools, was used for statistical analysis.

Results:

In the multivariable linear mixed model adjusted by possible confounders, the reasoning score was significantly lower in the high-exposure group of students than in the no-exposure group. Other scores and IQ were lower in the noise exposure groups, although these were not statistically significant. The duration of exposure did not show a significant relationship with cognitive functions.

Conclusion:

Chronic exposure to noise from military airfields may influence the cognitive functions, thereby reducing the learning performance of Korean children.

Keywords: airplane, children, environmental noise, cognition

INTRODUCTION

Several studies have shown that exposure to noise can negatively impact children's cognitive performance.[1,2,3,4,5] Children, in their formative years for physical and psychological development, are particularly at risk from excess noise exposure due to their lack of ability to adjust to external factors.[6] Previously, exposures to noise were reported to have an effect on various cognitive functions, such as attention,[7] memory,[8] reading performance,[9,10] and concentration.[11] Children affected by noise exposure have been found to have weakened problem-solving abilities, increased distractibility and behavioral problems,[2] as well as decreased reading ability.[12,13] The mechanisms by which noise affects cognition are still unclear, but hypotheses include direct biological effects,[14] indirect functional effects such as teacher and student frustration,[11] learned helplessness,[15] and increased arousal.[16]

In Korea, numerous military airfields and shooting ranges located near many schools and also residential areas pose a unique threat to public health. Aircraft noise is known to cause more disturbance than traffic noise, even at equivalent decibel levels.[17] As a result, the impacts of aircraft noise, specifically on children's cognitive functions, have received more attention in research than the effects of road traffic noise.[13] In addition, military aircraft noise exhibits

characteristics of high-intensity activity during specific periods, particularly during working hours, as compared to the more evenly distributed noise generated by civil aircraft. Generally, the military aircraft produce higher noise levels compared to civil aircraft, and its intensity increases when multiple aircraft depart and arrive in close succession. Therefore, it is widely acknowledged that military aircraft generate a higher level of annoyance compared to private airports.[18] Given these attributes, it can be inferred that students who primarily attend school during working hours are likely to experience annoyance as well. Previous studies have reported that because of different noise generation patterns the aircraft noise and road traffic noise affect different aspects of children's memory.[19] A previous report also indicated that the effect of aircraft noise is moderated by sociocultural factors and affects cognitive ability.[20] To date, the effects of aircraft noise exposure on cognitive functions have been observed relatively consistently in several studies. However, the specific cognitive functions affected, and the exact mechanisms, are unclear. Thus, research studies that consider the noise and social characteristics of each region are needed.

To promote airport noise-related policies in the Republic of Korea, an independent study is needed that reflects the local characteristics of the impact of aircraft noise on children's cognitive function. Therefore, in this study, we assessed the relationship between noise exposure and the cognitive functions of elementary school students near a Korean military airport.

MATERIALS AND METHODS

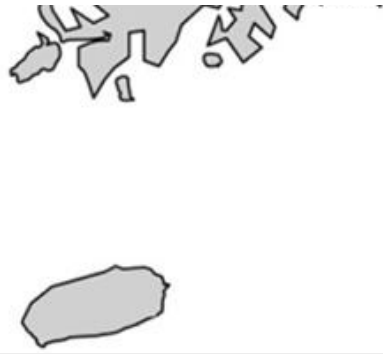
The classification of exposure and control groups

Among all military airfields in Republic of Korea four were selected for this study having a weighted equivalent continuous perceived noise level (WECPNL) greater than 75 dB . The WECPNL was a unit introduced by the International Civil Aviation Organization (ICAO) as a measure of long-term exposure to multiple aircraft noise. This unit is utilized in Korea and China and is determined by weighting the number of flights per hour to the average peak noise level of aircraft. The calculation further accounts for the temporal distribution of flights by weighting the number of flights by the time of occurrence. Further details on the calculation methodology can be found in cited literature.[21] The target schools were selected based on the noise regulation data of the regions surrounding the military aircraft airport, using pre-existing information for classification of the areas. Our target location with military aircraft airport was located in Daegu, Gwangju, Suwon, and Hoengseong [Figure 1]. This study compared cognitive functions between the noised-exposed and control groups cross-sectionally. Of note, cognitive functions may also be affected by external factors other than noise. Therefore, a non-exposed control group was selected to match an exposed group school. To control for confounding factors, school selection, region,

size, and socioeconomic status were considered when the noise-unexposed schools were matched with the noise-exposed schools. The noise level measurements and methods for each school are presented in Supplementary Material 1, which includes the WECPNL and Leq levels.

Figure 1.



[Open in a new tab](#)

Locations of study region with aircraft base on the Korean peninsula.

To evaluate the average noise level, noise from military aircraft was measured at each nearby elementary school for 1 week. Schools that were situated in areas previously classified as ≥ 80 WECPNL were marked as the high-exposure group, and those in areas corresponding to $75 \leq \text{WECPNL} < 80$ were as medium-exposure group. The unexposed schools were selected schools without aircraft noise and designated as the non-exposure group.

Sample size calculation

The aim of the initial study was to ascertain the impact of noise on the schools affected by such noise.[22] The sample size was calculated to secure a test power of 80% and a significance level of 0.05 when comparing the two groups.[23] This calculation was based on the requirement to identify a statistical difference of 5 points in Intelligence Quotient (IQ) score, with a standard deviation of 10 points. Assuming that four confounding variables were included, 10% of the sample per confounding variable was added.[24] Furthermore, assuming a dropout rate of 20%, $100 / (100 - \text{dropout rate})$ was multiplied for the target sample. Based on our calculation, the target sample size was set to 109.8. Further, to ensure the sample size has adequate power to identify the IQ 5 differences between each exposed school and the control school, a target sample size of 109.8 students per school was designated. In this study, we acquired raw data and integrated it, and then reanalyzed it using a mixed model approach to determine the effect of noise on each school. As a result, the sample size calculations for the mixed model analysis were not performed beforehand.

Study's participants

Data collection took place from June 2004 to February 2005. Before the field study commenced, cooperation from the students was sought from the schools selected based on pre-existing noise information (WECPNL) and regional data. The study was conducted in schools that consented to participate. The purpose and details of the study were explained to these schools, and participants were openly recruited. The study was conducted on voluntary participants who provided written consent from both themselves and their parents. The selected subjects of this study were all fifth graders who are 10–11 years old, depending on their birthday. In Republic of Korea, 5th-grade students in elementary schools typically have classes from 9:00 AM to 3:00 PM.

The exclusion criteria in both the exposure and control groups were as follows: (1) students with any diseases associated with clinically diagnosed conductive hearing impairment or mental retardation. (2) Students with perforated tympanic membrane or otitis media on otoscopic examination. (3) Students with markedly different hearing between the left and right ears. (4) Students whose residence was located near an airfield for control groups.

General characteristics survey

Sex, maternal education level, noise exposure period after entering elementary school, and subjective socioeconomic status (SES) were investigated. The noise exposure period was calculated in units of months by checking the question “Since when did the student attend this school?” The SES item was categorized as “very poor,” “poor,” “average,” and “good.”

Evaluation of cognitive functions

The Korean Intelligence Test-Primary (KIT-P) was used to evaluate cognitive functions. The KIT-P is widely used as a standardized and objective intelligence test similar to the intelligence quotient (IQ) test, for evaluating the overall learning performance, problem-solving skills, and adaptability of elementary school students in Korea,[\[25\]](#) and it has been used in various epidemiologic studies. [\[26,27\]](#)

Based on the multifactorial theory of intelligence, the KIT-P comprises four subcategories: vocabulary, reasoning, numeracy, and perception. The scores of the subcategories are summed and represented by a single IQ score. The vocabulary section of the test measures the ability to understand the meaning of words by matching synonyms and completing phrases. Reasoning measures logical thinking, which consists of reasoning of numbers and logical relationships of sequences. The numeracy section tests the ability to perform arithmetic operations and compare

quantitative differences. Lastly, perceptual space skills (plane, three-dimensional structure, and direction) are tested in the perception section. In detail, the KIT-P's vocabulary test consists of finding synonyms and also applying the most appropriate word in the blank space of a given sentence. Regarding reasoning, it is divided into language reasoning and numeric sequence reasoning. Language reasoning is tested by identifying four words with common properties among five given words. The numeric reasoning test involves inferring the next number in a sequence. Regarding numeracy, it consists of four basic arithmetic operations and application problems, such as the ability to handle numbers, simple quantitative problems, and recognition of quantitative differences. Perceptual ability is the ability to grasp the spatial position or spatial relationship, such as plane, solid, direction, etc., and involves finding a figure that can make a foursquare when matched with the presented figure. The KIT-P consists of 100 questions, with 30 questions to test vocabulary, 30 questions to test reasoning (15 each for language and numeric sequence, respectively), 20 questions to test numeracy, and 20 questions to test perception. The KIT-P requires approximately 40 minutes to complete. For our study, its administration was supervised by a licensed clinical psychologist. The examiner entered the examination room prepared by each school to encourage students to take the test, creating an environment where students could write their answers comfortably and without excessive anxiety. At the start of the test, the examiner provided necessary instructions and demonstrated how to record answers on the answer sheet through examples. During the example solving process, any questions from the students were answered, but no questions were answered once the test had started and the students had begun writing their answers. The score of each subcategory was expressed as a percentile rank of the general population. Scores from all subcategories were summed up to a single IQ score that was normalized with a mean of 100 and a standard deviation of 15, from the general population data.

Statistical analysis

The general characteristics, including gender, region, subjective SES, and maternal education level were collected for the exposure and control groups. The *P* value was calculated using the chi-square test for categorical variables. The average scores of each subcategory and IQ were also calculated according to the level and duration of aircraft noise. The *t*-test was used to compare the two groups, and analysis of variance was performed to compare more than two groups. To assess the association of exposure period and each scores of KIT-P, Spearman analysis was performed.

A linear mixed model was used for multivariate analysis of the exposure period and exposure status of the school, considering the matched pairs and confounders. In the mixed linear models, five school pairs were assigned as random effects. Since the level of exposure to noise, which is the most important fixed effect being investigated, was considered equal for all students by each

school, when considering each school as a random effect, the effect of the fixed effect could be diluted by collinearity, so it was not considered a random effect or second-level cluster. As dependent variables, the scores of each KIT-P and IQ were used. First, the association between exposure period and each score of KIT-P was analyzed. Then, the variable exposure status was added. In Model 1, only the variable(s) with interests were set as fixed effects, whereas in Model 2, theoretical confounders including maternal education level, subjective SES, and sex were additionally adjusted. Any students with a missing confounder were excluded only from the relevant model. Subgroup analysis was done for sex and SES.

Statistical analysis was performed using SPSS 26.00 (IBM, USA) and R project (<https://r-project.org>). The R packages “lme4” and “performance” were utilized for mixed model calculation. A P value <0.05 was considered statistically significant. To avoid missing variables that might be significant in multivariate analysis, a relevance level of P value <0.25 was set for univariate analysis when determining the inclusion of variables in multivariate analysis.[28]

RESULTS

Five nearby elementary schools were selected as the noise-exposed group, and another five schools were selected as the control group. There were 290 and 190 students in the high-exposure and mid-exposure groups, respectively, and 509 unexposed students in the control group. In total, 989 students participated in this study. Detailed participant characteristics, including region, sex, maternal education level, and subjective SES are presented in [Table 1](#). There were significant differences in the proportions of region, maternal education level, and subjective socioeconomic status among the four groups. Three missing values exist in the mother’s education level.

Table 1.

General characteristics of study participants

	Exposed group (<i>n</i> = 480 from five schools)		Control group (<i>n</i> = 509 from five schools)		<i>P</i> value(1 vs. 3)	<i>P</i> value(2 vs. 4)	<i>P</i> value(Exposed vs. Control)
	High-exposure (<i>n</i> = 290 from three schools)	Mid-exposure (<i>n</i> = 190 from two schools)	Control of high-exposure (<i>n</i> = 306 from three schools)	Control of mid-exposure (<i>n</i> = 203 from two schools)			
Total (5th grade)	290 (100%)	190 (100%)	306 (100%)	203 (100%)	0.691	0.843	0.879
Region							
Daegu (four schools)	85 (29.3%)	102 (53.7%)	99 (32.4%)	111 (54.7%)			
Gwangju (two schools)	0 (0%)	88 (46.3%)	0 (0%)	82 (40.4%)			
Suwon (two schools)	114 (39.3%)	0 (0%)	112 (36.6%)	0 (0%)			
Hoengseong (two schools)	91 (31.4%)	0 (0%)	95 (31%)	0 (0%)	0.540	0.281	0.836
Sex							
Male	151 (52.1%)	103 (54.2%)	167 (54.6%)	99 (48.8%)			

Female	139 (47.9%)	87 (45.8%)	139 (45.4%)	104 (51.2%)			
Aircraft noise exposure (mo)	47.7 ± 14.26 (2–55)	45.11 ± 17.03 (1–55)	-	-	-	-	-
Education level of mother							
≤ high school graduates	211 (72.8%)	127 (66.8%)	211 (69%)	104 (51.2%)	0.210	0.009	0.008
≥ college graduate	76 (26.2%)	63 (33.2%)	95 (31%)	99 (48.8%)			
No response	3 (1.0%)	0 (0%)	0 (0%)	0 (0%)			
Subjective socioeconomic status					0.367	0.738	0.360
Very poor, Poor	31 (10.7%)	44 (23.2%)	42 (13.7%)	43 (21.2%)			
Well, Very good	259 (89.3%)	146 (76.8%)	264 (86.3%)	160 (78.8%)			
High-exposed: >80 WECPNL, Mid-exposed: 75–80 WECPNL.							

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P value was calculated using chi-square test for categorical variables. Subjects with no response were excluded in statistical test. *P* value (1 vs. 3) was calculated for high-exposure group versus control of high-exposure group. *P* value (2 vs. 4) was calculated for mid-exposure group versus control of mid-exposure group. *P* value (Exposed vs. Control) was calculated for high- and mid- exposure group versus control for high- and mid- exposure

group. One school was selected for each exposure category in each region. Students of 85–114 from each school were participated.

When the high-exposure group and the high-exposure control group were compared, reasoning, vocabulary, numeracy, perception, and IQ scores were all lower in the exposed group, but these were not statistically significant. When comparing the medium-exposure group and the medium-exposure control group, all values of reasoning ability, vocabulary, numeracy, perception, and IQ were lower in the exposure group, but these were not statistically significant. When comparing the high-exposure group, the medium-exposure group, and the non-exposure group, the vocabulary and IQ scores of the high-exposure group were significantly lower than those of the control group [\[Table 2\]](#).

Table 2.

The results of cognitive test among participants by exposure group

	High-exposure (<i>n</i> = 290 from three school)	Control of high-exposure (<i>n</i> = 306 from three school)	<i>P</i> value	Mid-exposure (<i>n</i> = 190 from two school)	Control of mid-exposure (<i>n</i> = 203 from 2 school)	<i>P</i> value	
Reasoning score	53.6 ± 9.42	54.7 ± 9.38	0.157	55.1 ± 9.15	55.9 ± 9.13	0.340	
Vocabulary score	55.3 ± 10.18	56.5 ± 10.06	0.157	57.1 ± 10.11	58.2 ± 9.92	0.271	
Numeracy score	48.8 ± 10.11	49.0 ± 10.9	0.796	50.7 ± 10.34	52.6 ± 11.43	0.092	
Perception score	53.9 ± 10.67	54.6 ± 10.48	0.429	54.8 ± 10.09	55.7 ± 9.80	0.382	
Intelligent Quotient	105.9 ± 15.57	107.5 ± 16.31	0.219	108.9 ± 14.30	111.4 ± 16.03	0.115	
	Control (<i>n</i> = 509 from five schools)	Mid-exposure (<i>n</i> = 190 from two schools)	High-exposure (<i>n</i> = 290 from three schools)	<i>P</i> value	<i>P</i> for 1 vs. 2	<i>P</i> for 1 vs. 3	<i>P</i> for 2 v
Reasoning score	55.2 ± 9.30	55.1 ± 9.15	53.6 ± 9.42	0.053	1.000	0.058	0.256
Vocabulary score	57.10 ± 10.03	57.1 ± 10.11	55.3 ± 10.18	0.034	1.000	0.037	0.179

	High-exposure (<i>n</i> = 290 from three school)		Control of high-exposure (<i>n</i> = 306 from three school)	<i>P</i> value	Mid-exposure (<i>n</i> = 190 from two school)		Control of mid-exposure (<i>n</i> = 203 from 2 school)		<i>P</i> value	
Numeracy score	50.4 ± 11.27	50.4 ± 11.27	48.8 ± 10.11	0.069	1.000	0.113	0.163			
Perception score	55.1 ± 10.22	54.8 ± 10.09	23.9 ± 10.67	0.331	1.000	0.424	1.000			
Intelligent Quotient	109.0 ± 16.30	108.9 ± 14.30	105.9 ± 15.57	0.017	1.000	0.019	0.110			

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High-exposed: >80 WECPNL, mid-exposed: 75–80 WECPNL. Control: not exposed to aircraft noise. *P* value is calculated by analysis of variance. *P* value for post hoc analysis is adjusted by Bonferroni correction.

The exposure period did not show a statistically significant relationship with the vocabulary, reasoning, numeracy, perception, and IQ scores [Table 3]. However, the exposure period, and IQ (*P* = 0.183) and vocabulary (*P* = 0.166) scores showed potentially significant correlation (*P* < 0.25) in Spearman analysis. As a result, they were included in the final models with exposure status of school as independent variable.

Table 3.

Correlation matrix of exposure period and cognitive function test

		Exposure period	Vocabulary score	Reasoning score	Numeracy score	Perception score	Inte quc
Exposure period	Spearman's rho	1.000	-0.044	-0.033	-0.017	-0.030	-0
	<i>P</i> value	-	0.166	0.302	0.592	0.341	0.
Vocabulary score	Spearman's rho	-0.044	1.000	0.558	0.472	0.354	0
	<i>P</i> value	0.166	-	<0.0001	<0.0001	<0.0001	<0.
Reasoning score	Spearman's rho	-0.033	0.558	1.000	0.559	0.408	0
	<i>P</i> value	0.302	<0.0001	-	<0.0001	<0.0001	<0.
Numeracy score	Spearman's rho	-0.017	0.472	0.559	1.000	0.337	0.
	<i>P</i> value	0.592	<0.0001	<0.0001	-	<0.0001	<0.
Perception score	Spearman's rho	-0.030	0.354	0.408	0.337	1.000	0.
	<i>P</i> value	0.341	<0.0001	<0.0001	<0.0001	-	<0.
Intelligent Quotient	Spearman's rho	-0.042	0.77	0.81	0.766	0.689	1.
	<i>P</i> value	0.183	<0.0001	<0.0001	<0.0001	<0.0001	
Spearman's rho and <i>P</i> value were suggested for correlation statistics.							

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Correlation was calculated by Spearman's rank correlation analysis.

In analysis with both exposure period and exposure status, Model 1, in which exposure period and exposure group were used as a fixed effect and five pairs of schools were included as a random effect, the exposure period did not show a significant relationship with reasoning, vocabulary, IQ, numeracy, and perception scores. As for the difference according to the exposure group, the reasoning score (−3.86 points, 95% CI −6.81 to −0.91) and IQ (−5.51 points, 95% CI −10.48 to −0.53) was found to be significantly lower in the high-exposure group than in the control group. In Model 2, which was adjusted for sex, maternal education level, and SES, only the reasoning score was significantly lower in the high-exposure group compared with that in the control score (−3.41 points, 95% CI −6.32 to −0.51). In the other KIT-P parameters including the total score, the medium-exposure group and the high-exposure group showed consistently lower results than the control group, but these were not statistically significant [[Table 4](#)]. The diagnostic statistics of each model were presented in Supplementary material 2. In subgroup analysis, high noise level exposure group shows significantly lower reasoning level in female and high SES group (Supplementary material 3).

Table 4.

Multivariable linear mixed model of aircraft noise exposure and cognitive function test adjusted for possible confounders

		Reasoning score		Vocabulary score		Perception score		Numeracy score
		Beta (95% CI)	P value	Beta (95% CI)	P value	Beta (95% CI)	P value	Beta (95% CI)
Model 1	Exposure period(years)	0.6 (-0.03, 1.27)	0.061	0.40 (-0.30, 1.10)	0.261	0.36 (-0.36, 1.08)	0.333	0.28(-0.46, 0.28)
	Controlschool	Ref.	-	Ref.	-	Ref.	-	Ref.
	Mid-exposureschool	-2.81 (-5.79, 0.15)	0.062	-2.27 (-5.52, 0.96)	0.167	-1.90 (-5.20, 1.41)	0.259	-2.61 (-6.07, 0.85)
	High-exposureschool	-3.86 (-0.03, 1.27)	0.010	-3.01 (-6.25, 0.15)	0.062	-2.33 (-5.60, 0.95)	0.164	-1.68 (-5.08, 1.72)
Model 2	Exposure period(years)	0.51 (-0.13, 1.15)	0.116	0.27 (-0.42, 0.95)	0.442	0.27 (-0.44, 0.99)	0.450	0.16 (-0.56, 0.89)
	Controlschool	Ref.	-	Ref.	-	Ref.	-	Ref.
	Mid-exposureschool	-2.16 (-5.11, 0.79)	0.151	-1.29 (-4.45, 1.88)	0.425	-1.12 (-4.50, 2.01)	0.453	-2.07 (-5.48, 1.33)
	High-exposureschool	-3.41 (-6.32, -0.51)	0.021	-2.75 (-5.87, 0.36)	0.083	-2.14 (-5.38, 1.10)	0.196	-1.03 (-4.36, 2.29)

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Coefficient (beta) and *P* value were calculated by linear mixed model. In Model 1, multivariable linear mixed model analysis was performed with exposure period and exposure status of school as fixed effect. In Model 2, sex, education level of mother, subjective socioeconomic status were additionally adjusted as fixed effect. Pair of each school were considered as random effect.

DISCUSSION

To evaluate the association of aircraft noise with children's cognitive function, the KIT-P subcategory, and IQ test scores were compared between the exposed and control groups. Initially, comparisons between each exposed and control school were performed, but no significant difference was observed in the univariate analysis. However, when all control schools were combined into one group, significant differences were observed in some variables. After adjusting for potential confounders and taking the exposure period into account, the mixed model approach, which can use all of the participants' data in a single model while adjusting for potential confounders, revealed a significant negative association between reasoning score and noise exposure. The results indicated that the high-noise exposed group had significantly lower reasoning scores compared to the control group. Overall, the findings indicate that cognitive functions were associated with aircraft noise.

The World Health Organization (WHO) has been compiling and presenting evidence of the link between environmental noise and cognitive impairment in children.[\[29\]](#) In 2018, after reviewing previous evidence on aircraft noise, WHO found that it can negatively impact children's reading and oral comprehension skills and strongly recommended regulating noise levels near airports. [\[30\]](#)

Since the associated mechanisms remain unclear, Evans and Maxwell[\[31\]](#) suggested that decreased auditory discrimination and language perception, which are parameters of reading comprehension, are the main causes for decreased reading ability. Previous studies have reported that chronic exposure to aircraft noise influences central information processing and cognitive functions including reading, memory, language skills, and concentration.[\[1,11,32,33,34\]](#) As one of the representative large-scale studies, the RANCH project (road traffic and aircraft noise exposure and children's cognition and health: exposure–effect relationships and combined effects) conducted in the United Kingdom reported that exposures to chronic aircraft noise affect reading comprehension and recognition memory.[\[8,35\]](#) In a meta-analysis of epidemiological studies on children's reading, reading comprehension was statistically significantly lower in the chronic

aircraft noise-exposed group.[13,35] Notably, a decrease in reading skills has been found in the groups exposed to aircraft noise. The results of the different studies are relatively consistent but the mechanisms are unclear. In the NORAH study (noise-related annoyance, cognition, and health study) conducted in Germany, a decrease in reading skills with increased noise exposure was observed, but a decrease in verbal precursors, such as phonological processing and listening comprehension, was not identified.[9] In the same study, a decrease in word and text reading skills was identified along with a decrease in reading ability in the group exposed to aircraft noise, but a decrease in sentence reading and verbal tasks (episodic memory, short-term memory, rapid naming, phonological awareness, speech perception) was not observed.[36] In another study conducted among children living near to the old and new Munich International Airport, noise affected speech perception, but this did not mediate a decline in reading skills.[33] Reading is a skill that requires the coordination of various abilities in an integrated manner.[37] The mechanism by which aircraft noises reduce reading abilities, and affect the pathways relating to the different abilities that contribute to reading, are still only proposed at the hypothetical level. Although reading skills were not measured directly in this study, the KIT-P was used to assess cognitive functions included items on language skill; vocabulary and reasoning skills (15 out of 30 questions were language reasoning questions); as index scores related to language. From the KIT-P, there was no difference between the exposed group and the non-exposed group in vocabulary skills, whereas a decrease in the reasoning score was evident. Of the different cognitive functions, only certain abilities were affected. The identification of a deficit in a specific area can be a clue to determining the mechanism by how chronic noise exposures were associated with reading skills and cognitive functions.

The subgroup analysis found significant associations between noise and reasoning score only in female and high SES participants. This suggests that certain groups may be more sensitive to noise or that factors such as sex and SES may moderate its effect. The relationship between noise and cognitive function remains unclear, with some studies showing that women perform worse in simple arithmetic in noisy environments,[38] while others show no effect of sex.[39] Further research is needed to determine if sex and SES act as moderating factors.

In this study, there was no significant difference between the exposed group and the non-exposed group in numeracy ability. This finding is consistent with the results of previous studies.[40,41] For perception, no significant differences according to different aircraft noise exposure levels were observed in previous studies using embedded figures task[42] and block design test.[43] In this study, we did not detect a significant difference in perception either. Moreover, there was no significant difference in the total IQ score between the exposed and unexposed groups. Furthermore, in this study, students exposed to the ≥ 80 WECPNL level of noise did not show a

significant score difference compared with students in the control group. This finding suggests that chronic aircraft noise exposure should be at a fairly high level to have a statistically identifiable effect on cognitive functions. Additionally, high-level aircraft noise exposure seems to be associated with only a specific area of cognition, rather than the overall cognitive functions.

In this study, the correlation between exposure duration and cognitive function was statistically insignificant. There is no general consensus on the minimum period of noise exposure that may influence cognitive functions. However, according to the Munich airport studies, which were generally viewed with high validity in this field, suggested that 2 years of chronic noise exposure may be enough to have cumulative effects on cognitive functions.[33] They reported that the reading ability of students from nearby schools slightly improved after shutting down the airport, which remained the same until 1 year after the construction of the new airport, and the reading ability declined significantly 2 years after that. It is difficult to estimate the minimum period of noise exposure that influences cognitive functions since pre-school noise exposure was not considered in this study. Although not reported, in this study, there was no significant difference in the cognitive function scores based on a 2-year exposure period, as a categorical variable instead of a continuous variable. Since this study did not investigate the effect of stopping noise exposure on cognition, a separate study is needed to determine whether the effect is of an acute or subacute nature and reversible following the cessation of noise exposure, or whether the effect is of a chronic nature, and the adverse effect on cognition persists even after noise exposure is stopped.

This study has several limitations, including being a cross-sectional study that cannot fully explain the mechanisms or establish a causal relationship. At the research design stage, schools were selected based on previously designated noise information for compensation, and the control group was selected accordingly. Only areas with airport noise exposure above WECPNL 75 were considered, and other factors such as school building structure or road traffic effects were not taken into account. For individual assessment of participants, we did not assess individual aircraft noise exposure before participants started elementary school or other potential sources of noise. Participants' subjective perception or sensitivity to noise, which can affect the relationship between noise and cognitive function, was not evaluated. This study has not assessed individuals' subjective perception or sensitivity to noise, which could play a role in moderating the relationship between noise and cognitive function.[39] Another limitation at the individual level is that only the index scores and total score results of the KIT-P test suggest only four areas of cognitive function. It would be important to measure more detailed parts of cognition to determine which areas are associated. This study had a limitation in its noise exposure classification as it relied only on WECPNL and did not consider event-based or statistical indicators. WECPNL, which considers the number of noise occurrences and duration, is an energy-based indicator, but does not

fully represent the dynamic and temporal nature of noise and may underestimate its health effects. [44] Further studies should include a larger number of students and consider the effects of noise from various sources with a longitudinal study design, and should also evaluate the minimum level and duration of noise exposure for influencing cognitive functions.

The strength of the study methodology lies in the attempt to minimize differences in baseline cognitive function between the exposed and control groups by matching schools within the same city. The final multivariable mixed model considered the impact of confounders such as maternal educational background and SES, though the number of confounders considered is limited.

This study, which reanalyzes previous results with updated statistical methods, shows that chronic aircraft noise exposure has a significant impact on specific cognitive areas. The findings, which show a negative association between noise and reasoning skills, suggest that noise may also have a negative effect on learning abilities. These results, along with others, may provide evidence for discussions about the suitability of having schools near military airfields. Currently, damage from military airfield noise is compensated for by the Military Airfields And Military Firing Ranges Noise Prevention And Compensation Act in South Korea.[45] However, compensation for schools was omitted in the military noise compensation-related legislation enacted in November 2020. [46] There is a lack of strategies to address the learning disruptions caused by noise, with current efforts primarily focused on noise reduction measures such as installing noise-reduction windows. [47] Therefore, not only noise prevention measures be implemented in schools near military airports. Therefore, not only should schools near military airfields implement noise prevention measures, but measures to substantially improve the study environment for students, such as additional teachers, reduced class sizes, adjusted learning times, and supplementary resources, should also be considered.

Author contributions

K.B.: Conceptualization, Methodology, Resources, Writing – Original Draft.

C.B.: Formal analysis, Writing – Review & Editing, Methodology.

J.S.: Data Curation, Investigation, Writing – Review & Editing, Supervision, Funding acquisition, Project administration.

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Conflicts of interest

There are no conflicts of interest.

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Airplane Noise May Be Bad for Your Health

Researchers find that exposure to aircraft noise is tied to a higher body mass index, which can increase risk of heart attack and stroke

Airplane Noise May Be Bad for Your Health

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Like many major airports, Boston Logan International is part of the city it serves—but so is the noise it generates. A new BU study found exposure to aircraft noise may lead to higher body mass index, an indicator of general obesity. Photo by Philippe Murray-Pietsch via Unsplash

JUNE 4, 2024

BY JILLIAN MCKOY

2 COMMENTS

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living under your flight path. The noise of your plane whisking you away could be damaging their health, putting them at greater risk of developing cardiometabolic diseases, a cluster of conditions that includes heart attack, stroke, diabetes, and hypertension.

A new study from researchers at the Boston University School of Public Health and Oregon State University (OSU) found that people who were exposed to aircraft noise levels at 45 decibels or more were more likely to have higher self-reported body mass index (BMI)—an indicator of general obesity, which can lead to cardiometabolic diseases, as well as a range of other health issues. A noise level of 45 decibels (dB) is just above the hushed tones of a library (40 dB) and quieter than a typical conversation at home (50 dB).

The researchers concluded that the highest BMI measures were linked to aircraft noise levels at 55 dB or above. Noise exposure at 45 dB or above was also associated with having higher BMI in middle to late adulthood from early adulthood. The study, published in the [journal *Environment International*](#), is the first to explore a connection between aircraft noise exposure and obesity nationwide in the United States; past studies on this subject have focused on European populations, and results have varied.

“In the US, noise has been an overlooked environmental pollutant,” says [Junenette Peters](#), an SPH associate professor of environmental health, who helped lead the research. “In our modern world, noise is continually around us and our bodies may not have adjusted to this constant input of noise. Noise influences stress responses, which may start a series of events that can lead to higher BMI and later to disease.”

[In a 2023 study](#), Peters found aircraft noise—even as low as 45 db

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noise could reach out as far as 22 miles from a major airport.

“Prior research has shown that aircraft noise can elevate stress responses and [disturb sleep](#), but there has been mixed evidence of

any links with body mass index,” says former SPH postdoctoral associate [Matthew Bozigar](#), now an assistant professor of epidemiology at OSU, who worked with Peters on both studies. “We were surprised to see a fairly robust link between aircraft noise and higher body mass index.”

The researchers say the new findings underscore the role of the environment in a person’s risk of chronic disease.

“Obesity has become very stigmatized, but what is important to remember is that it is linked with poor cardiometabolic health outcomes and that it has strong environmental drivers,” Bozigar says. “This is disheartening, but also promising in the sense that we could potentially enact policies to mitigate these drivers of obesity.”

Regional Differences in Aircraft Noise Impact

For the study, the researchers examined aircraft noise exposure and self-reported BMI and other individual characteristics among nearly 75,000 participants living around 90 of the major US airports. The participants were selected from the [Nurses’ Health Studies](#) (NHS), ongoing prospective studies of participating female nurses who have completed biennial questionnaires since the 1970s and 1980s.

The team examined aircraft noise levels every five years from 1995 to 2010, using a day-night noise level (DNL) estimate that captures

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noise is low. The current policy-related threshold for significant noise impacts is above DNL 65 dB. The researchers assessed BMI measures at multiple thresholds below that for the nurses’ geocoded residential addresses.

Although the team says that BMI is a suboptimal metric, the independent and strong association between more aircraft noise exposure and higher BMI that they observed is notable. There were also regional differences, with stronger associations among participants on the West Coast and those who live in arid conditions.

“We can only hypothesize about why we saw these regional variations, but one reason may relate to the era of regional development, building characteristics, and climate, which may affect factors such as housing age, design, and level of insulation,” says Peters. “Regional differences in temperature and humidity may influence behaviors such as window opening, so perhaps study participants living in the West were more exposed to aircraft noise due to open windows or housing type, which allowed more noise to penetrate.”

Similarly, the stronger associations observed in arid climates, many of which are also in the western United States, may relate to the way noise travels under various atmospheric conditions, she says.

Environmental Injustices

In future research, Peters hopes to examine broader inequities in environmental noise exposure, particularly among other populations. [Previous data](#) suggest that Black, Hispanic, and low-income populations are disproportionately exposed to aircraft



“We need to study the potential health impacts of environmental injustices in transportation noise exposures alongside other environmental drivers of poor health outcomes,” Bozigar says.

“There is a lot more to figure out, but this study adds evidence to a growing body of literature that **noise negatively impacts health.**”

For now, Peters says, residents troubled by the rumble of aircraft can educate themselves—the [Federal Aviation Administration has a series of primers and details for making a complaint](#)—and advocate for lawmakers to consider the health implications of environmental noise.

“There are a growing number of people calling for federal funds to be allocated to the Environmental Protection Agency’s Office of Noise Abatement and Control, which would reinstate the EPA’s authority to direct noise research and control activities,” she says. “We can also consider efforts to reduce the noise airplanes make and where and when airplanes fly, and to expand noise abatement programs, keeping in mind national and international considerations on our ability to travel and to get goods and services.”

This research was funded by the Federal Aviation Administration. Other BU researchers involved in the study were Stephanie Grady (SPH’24), Elizabeth J. Nelson (CAS’23), and [Jonathan Levy](#), an SPH professor and chair of environmental health.

Andrew Thurston contributed reporting to this article.

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CHARLES BAKER JUNE 12, 2024 AT 3:40 PM

Maybe you should've also considered the military who are exposed to flight-line and flight-deck air craft noise. As for those in the flight path I'm a little skeptical that standing around while planes fly overhead is going to make them fat.

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SFO FLYING TIGER JUNE 20, 2024 AT 1:20 PM

The study problems begin in section 2.3. Data was selected based on nurses who lived in proximity to one of 90 airports. The FAA provided noise data every 5 years, whereas the nurses were surveyed every 2 years. So the researchers had to estimate addresses for data matching for a majority of the data points analyzed. Data points living 22.1 miles away from any airport were excluded.

After a quick read of the study, I don't see whether the researchers considered the impacts of a healthy diet & regular exercise? If a person decides to skip their workout, or eat a chimichanga and an apple fritter everyday, that can't be blamed on aircraft noise. Did they consider that some nurses may work very long or stressful shifts, which may contribute to lack of exercise & healthy food? That can't be blamed on aircraft noise. The researchers did exclude data when the participants reported cancer or diabetes or pregnancy (non-normal BMI). Also on first glance, the study looked at nurses home addresses, not addresses where they worked. 45% of the datapoints lived in the Northeast.

I don't see a comparison with a control group that lives in a noisy place not

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cable cars, fog horns, etc. I can't hear airplanes in San Francisco most of the time. The city noise drowns out the airplane noise (except on Blue Angel demonstration flight days).

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Sociodemographic Patterns of Exposure to Civil Aircraft Noise in the United States

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BACKGROUND: Communities with lower socioeconomic status and higher prevalence of racial/ethnic minority populations are often more exposed to environmental pollutants. Although studies have shown associations between aircraft noise and property values and various health outcomes, little is known about how aircraft noise exposures are sociodemographically patterned.

OBJECTIVE: Our aim was to describe characteristics of populations exposed to aviation noise by race/ethnicity, education, and income in the United States.

METHODS: Aircraft noise contours characterized as day–night average sound level (DNL) were developed for 90 U.S. airports in 2010 for DNL ≥ 45 dB(A) in 1-dB(A) increments. We compared characteristics of exposed U.S. Census block groups at three thresholds (≥ 45 , ≥ 55 , and ≥ 65 dB(A)), assigned on the basis of the block group land area being $\geq 50\%$ within the threshold, vs. unexposed block groups near study airports. Comparisons were made across block group race/ethnicity, education, and income categories within the study areas ($n = 4,031\text{--}74,253$). We performed both multinomial and other various multivariable regression approaches, including models controlling for airport and models with random intercepts specifying within-airport effects and adjusting for airport-level means.

RESULTS: Aggregated across multiple airports, block groups with a higher Hispanic population had higher odds of being exposed to aircraft noise. For example, the multinomial analysis showed that a 10-percentage point increase in a block group's Hispanic population was associated with an increased odds ratio of 39% (95% CI: 25%, 54%) of being exposed to ≥ 65 dB(A) compared with block groups exposed to < 45 dB(A). Block groups with higher proportions of residents with only a high school education had higher odds of being exposed to aircraft noise. Results were robust across multiple regression approaches; however, there was substantial heterogeneity across airports.

DISCUSSION: These results suggest that across U.S. airports, there is indication of sociodemographic disparities in noise exposures. <https://doi.org/10.1289/EHP9307>

Introduction

Communities with low socioeconomic status (SES) and high prevalence of racial/ethnic minority populations are often exposed to greater numbers and concentrations of environmental hazards (Mohai et al. 2009; Zwickl et al. 2014). In the United States, disproportionate exposure may reflect procedural injustices in environmental regulations, institutional and individual discrimination, and racist housing policies manifesting in residential segregation and suburbanization, as well as structural factors such as politics and economics that affect facility siting and the racialization of labor markets (McCartney et al. 2019; Morello-Frosch 2002).

One exposure for which disproportionate burdens may be felt is aircraft noise due to a complex set of factors including land-use patterns connected with airport economies and flight paths. Aircraft noise is a major source of annoyance and complaints in communities surrounding airports (Miller et al. 2021). In addition, studies have related aircraft noise to sleep disturbance, impairments in children's

cognition, negative birth outcomes, and cardiovascular disease outcomes, as well as risk factors such as hypertension (reviewed by Basner et al. 2017). An important first step to understanding potential health impacts in the United States is to investigate aircraft noise exposure patterning related to community sociodemographic characteristics.

A popular method for investigating population impacts of aircraft noise is to evaluate its association with property values (e.g., Nelson 2004); however, most of these analyses do not directly evaluate the distribution of noise exposures as a function of a community's sociodemographic characteristics. A few studies have specifically investigated the distribution of sociodemographic characteristics around airports but, to our knowledge, only around individual airports. Ogneva-Himmelberger and Cooperman (2010) found a greater prevalence of racial/ethnic minority and lower-income populations within areas with aircraft noise levels > 55 dB(A) compared with unexposed areas within a 21-km radius surrounding Boston's Logan International Airport. Similarly, Sobotta et al. (2007) reported that the primary predictor of aviation noise around a commercial airport in Arizona was race/ethnicity, followed by poverty. Most et al. (2004) investigated patterns around St. Louis-Lambert Field and found a higher prevalence of racial/ethnic minority and lower SES populations living in areas of high noise levels [60–65 dB(A)]; however, they found a lower prevalence of racial/ethnic minority and higher SES populations in areas with even more highly elevated noise levels [70–75 dB(A)]. A UK study in Birmingham (Brainard et al. 2004) found “only rather weak evidence” of an association between combined transportation (i.e., road, rail, and airport) noise exposure and ethnicity and socioeconomic deprivation. Alternatively, a study in the Netherlands looking at transportation noise exposures separately found different relationships by

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noise exposure source, most relatedly, lower social inequality associated with aircraft noise exposure (Kruize et al. 2007; WHO Regional Office for Europe 2010). Dreger et al. (2019) performed a systematic review of studies of environmental noise exposure in the World Health Organization (WHO) European Region and found mixed results in the eight studies they evaluated but an indication of higher noise exposure in groups of lower socioeconomic position; they proposed that mixed results could be due to differences in how noise and social inequality were measured. Although studies of individual airports are valuable, it is unclear what the sociodemographic patterns of aircraft noise exposure would be across and between multiple airports evaluated using the same noise and sociodemographic measures.

Our objective was to investigate whether racial/ethnic minority and low-SES populations in the United States are disproportionately exposed to aircraft noise. To this end, we used spatially resolved noise measures modeled using the method required for environmental impact assessment and compliance for 90 U.S. airports spanning all regions and various hub types. We paired these data with U.S. Census and American Community Survey (ACS) data to perform an investigation of the sociodemographic distributions around U.S. airports. We also estimated associations with sociodemographic characteristics controlling for distance to airport and evaluated between- and within-airport relationships.

Methods

Study Airports

Ninety airports with available noise modeling inputs were provided by the Federal Aviation Administration (FAA) for this study. These airports comprised several hub types, categorized on the basis of percentage passenger enplanement (49 U.S. Code § 47102), including 29 large, 27 medium, 29 small, and 5 nonhub airports located in 40 of the 50 states (Figure 1). For 2010, total passenger enplanements from these 90 airports represented 87% of all passenger enplanements at U.S. airports (FAA n.d.). The majority of the airports were located in urban/metropolitan areas—only eight

airports (9%) had a study area that included at least one rural census tract as defined by the U.S. Department of Agriculture's rural–urban commuting area (USDA 2019).

Noise and Population Data

Annual average noise levels from aircraft were estimated around each of the 90 study airports for the decennial census year 2010. For each period, both day–night average sound level [DNL; sound ≥ 45 dB(A)] and nighttime average sound level (LAeqN; sound ≥ 45 dB(A)) were modeled in 1-dB(A) increments. DNL is calculated as a 24-h annualized average noise level, based on an entire year of operations modeled to a single average annual day, with a 10-dB(A) penalty for nighttime noise (noise from 2200 to 0700 hours). The U.S. Department of Transportation's John A. Volpe National Transportation Systems Center (Volpe) conducted the noise computations using the FAA's Aviation Environmental Design Tool (AEDT; version 2d) from ground-track statistics. The source of aircraft operations data was the Enhanced Traffic Management System, which provided operations under Instrument Flight Rules for the observed year, including the length of the mission (or stage length), time of the operation, as well as the International Civil Aviation Organization aircraft type, excluding helicopter operations. Operations were annualized using the following groupings: Aircraft Noise and Performance aircraft type, day- or nighttime, operation airport, and stage length. Volpe used the dynamic grid capabilities to automatically determine the grid size.

Population data at the 2010 U.S. Census block group level were acquired from the ACS (5-y estimates from 2008–2012) (U.S. Census Bureau n.d.-a). A block group is the smallest statistical unit for which the U.S. Census reports data; it is a cluster of blocks within a census tract (a relatively permanent statistical subdivision of U.S. counties) and can contain 600–3,000 people (240–1,200 housing units) (U.S. Census Bureau n.d.-c). This study accesses only public-use data from the U.S. Census/ACS, which thus does not include individually identifiable data and is not considered human subjects research.

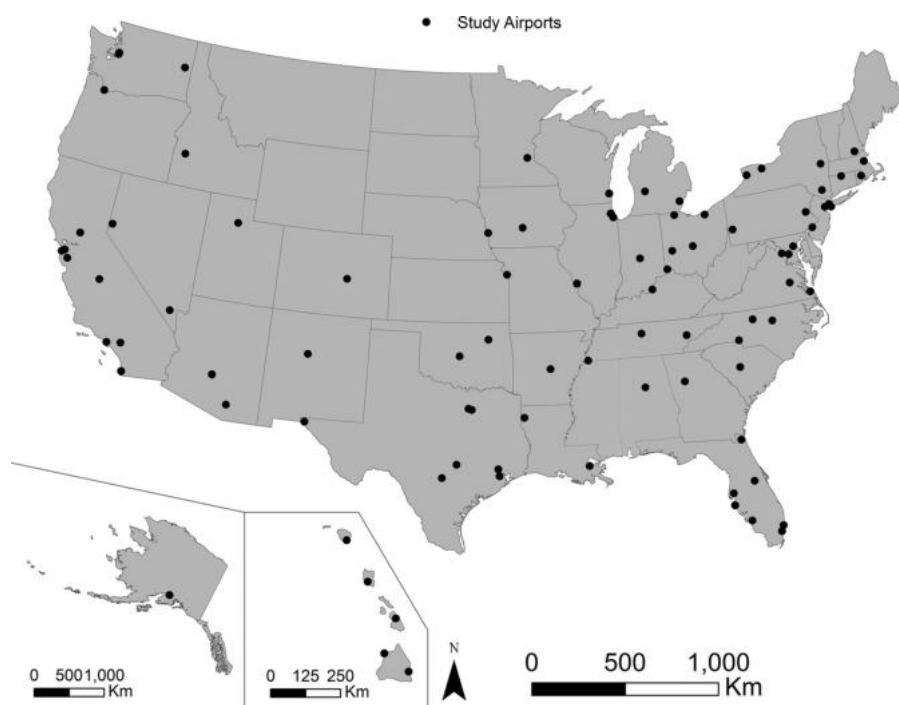


Figure 1. Map of 90 study airports (represented as points in the figure) across the United States. Figure designed with ArcMap 10.6.

We generated data tables on race/ethnicity, education, and SES using raw data and SAS (SAS Institute Inc.) code downloaded from the ACS website (U.S. Census Bureau n.d.-d). Race/ethnicity is collected in the census by self-identification from categories based on social definitions recognized in the United States (U.S. Census Bureau n.d.-b). We calculated the percentage of each of the following characteristics for each block group population: *a*) race/ethnicity: non-Hispanic white, non-Hispanic Asian, non-Hispanic black, Hispanic, and other (all other non-Hispanic/non-white races/ethnicities); *b*) education: no high school diploma or General Education Development (GED), high school diploma or GED, and education of at least some college; and *c*) household annual income (in USD): <\$25,000, \$25,000 to <\$50,000, \$50,000 to <\$75,000 and ≥\$75,000. Hereafter, we consider the reference groups to be non-Hispanic whites for race/ethnicity, education of at least some college, and household incomes ≥\$75,000, with the remaining groups considered to be “socially vulnerable groups.”

To assess the reliability of the ACS block group data used in the analyses, we calculated the coefficients of variation (CVs) for each of our derived variables used during modeling, for each block group. Following the ACS General Handbook (U.S. Census Bureau 2020), the coefficient of variation (CV) was calculated using Equation 1:

$$CV = \frac{\left(\frac{MOE}{1.645}\right)}{Estimate} \times 100, \quad (1)$$

where *MOE* is the associated margin of error for the estimate, and *Estimate* is the derived estimate for the variable of interest within each block group (U.S. Census Bureau 2020). Margins of error accompany each block group estimate value but require additional

calculation if ACS estimates are aggregated. For our analysis, we represented block group estimates as percentages relative to the entire block group population; thus, we added the fractional MOEs in quadrature [i.e., the square root of the sum of squares; see Harvard University (n.d.)]. For any derived estimates that were aggregated by summing individual ACS estimates, we added the ACS MOEs in quadrature. Block group CVs were binned into “high,” “medium,” and “low” data reliability as defined by Esri whereby CVs ≤12% are “high,” CVs between 12% and 40% are “medium,” and CVs >40% are “low” (Esri 2014).

Exposure Assignment

We grouped noise contours into three categories (i.e., ≥45 dB(A), ≥55 dB(A), and ≥65 dB(A)) to coincide with the WHO Regional Office for Europe’s recommendation for noise and health (WHO Regional Office for Europe 2018), the European Union Aviation Safety Agency guideline (EASA 2021), and FAA regulations for noise abatement funding (FAA n.d., 2000), respectively. Noise contour data were provided in shapefile format, which we imported into a Geographic Information System (GIS; ESRI ArcMap, version 10.6). These grouped noise contours were overlaid onto 2010 Census block groups using ArcMap (ESRI). Block groups with ≥50% of their area inside the noise contour threshold being investigated were assigned as “exposed,” and all others were assigned as “unexposed.” The unexposed group was limited to block groups within a certain distance from each study airport, termed the “maximum extent.” The maximum extent was different for each airport and, similar to as used by Sobotta et al. (2007), was defined as the maximum distance a noise contour threshold reached from the center of the airport (Figure 2). A buffer centered at the airport and

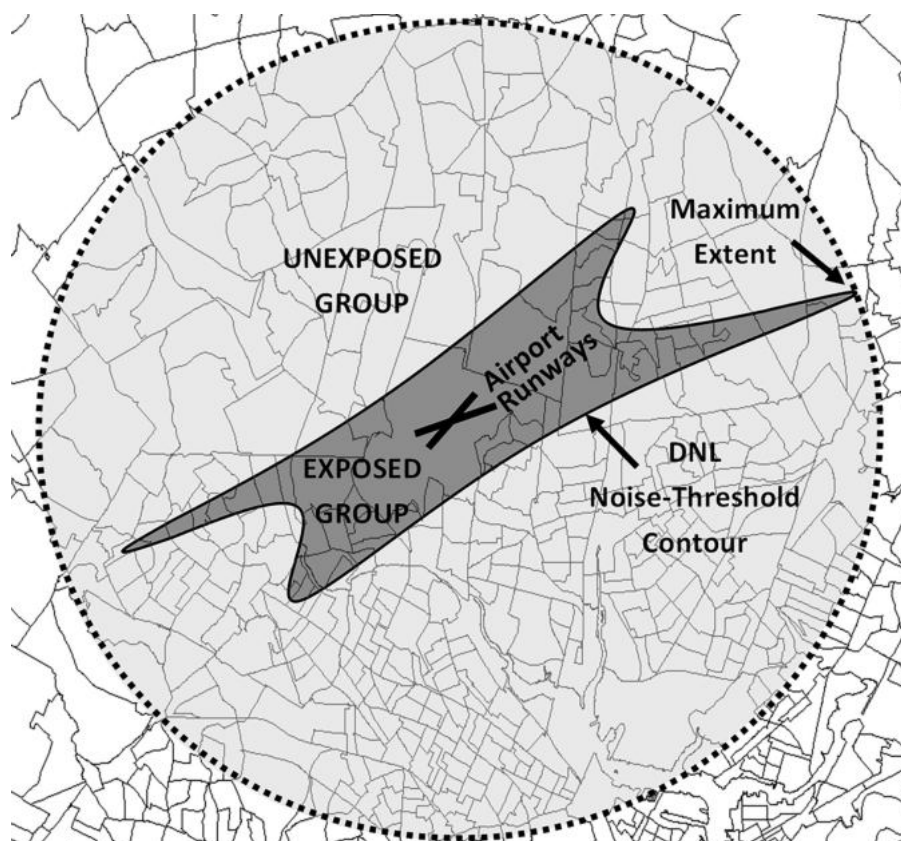


Figure 2. Example of a noise contour threshold around a fictional airport and assignment of exposed and unexposed block groups (i.e., underlying polygons). The maximum extent is defined as the smallest radius of a circle centered on the airport that encompasses the entire noise contour. Block groups with ≥50% of their area within the noise contour are assigned to the exposed group, and block groups not in the exposed group but with ≥50% of their area within the maximum extent are assigned to unexposed group. Block group layer from ArcMap 10.6. Note: DNL, day–night average sound level.

extending out a radius equal to the maximum extent defined the geographic limit of the unexposed comparison group. Block groups along this edge were included as long as $\geq 50\%$ of their area was within the buffer. Airport-specific maximum extents were calculated for each of the three noise contour thresholds; thus some block groups assigned to the unexposed group for one noise threshold could have been excluded completely for another. Water bodies were removed from the block group GIS layer before any area calculations; however, we kept all other land-use types in the analysis given that our analysis was confined to near-airport areas where we would not expect there to be much land area designated as more unpopulated than water bodies. To test this claim, we overlaid the 2010 national green space layer [parks, gardens, and forests (Esri 2021)] and calculated the additional land area that would be removed from our analyses if green spaces were also excluded—it amounted to $<2\text{--}4\%$ of the combined 45–65 dB(A) study areas.

To compare across increasingly higher exposure categories (45 to <55 , 55 to <65 , and ≥ 65 dB(A)) relative to the base category (<45 dB(A)), we included data from 74,253 block groups surrounding the 90 airports. For comparison at thresholds, we included only airports that had ≥ 100 block groups identified within the airport group (threshold specific). As the noise threshold increased, the total number of block groups included in the analyses decreased—for the DNL thresholds of 45, 55, and 65 dB(A), analyses included data from 74,170 block groups (86 airports), 32,283 block groups (61 airports), and 4,031 block groups (15 airports), respectively. Because LAeqN contours were generally much smaller than the DNL contours, the number of airports included in the LAeqN analyses were even fewer. For LAeqN thresholds of 45, 55, and 65 dB(A), analyses included data from 54, 10, and 0 airports, respectively (thus, no analyses could be completed for the LAeqN 65-dB(A) contours).

Analytical Methods and Calculations

To understand whether socially vulnerable groups living near U.S. airports were more or less exposed to aircraft noise than socially advantaged groups in the same areas, we compared the percentage of the socially vulnerable group exposed compared with unexposed for each noise threshold using mean-difference plots and various logistic modeling approaches. We displayed the univariable comparisons using mean-difference plots to highlight the variability across airports for the change in percentage for each socially vulnerable grouping exposed as compared with the entire airport group (exposed and unexposed) mean.

We performed both multinomial multivariable regression and multivariable hybrid mixed-effect logistic regression (all airports

grouped together for both). Multinomial regression used ordered outcome measures to determine the relationship of sociodemographic characteristics at higher noise level categories (45 to <55 , 55 to <65 , and ≥ 65 dB(A)) relative to the base category (<45 dB(A)). Multivariable hybrid mixed-effect logistic regression with a random intercept was used to separate within- and between-cluster (airport) effects (Begg and Parides 2003; Neuhaus and Kalbfleisch 1998; Schunck and Perales 2017), as given by Neuhaus and Kalbfleisch (1998) in Equation 2:

$$\text{logit } pr(Y_{ij} = 1 | X_{ij}, a_i) = a_i + \beta_B \bar{X}_i + \beta_W (X_{ij} - \bar{X}_i), \quad (2)$$

where Y_{ij} is the outcome exposure to aircraft noise at three thresholds [≥ 45 , ≥ 55 , and ≥ 65 dB(A)]; $i = 1, 2, \dots, k$ airports; $j = 1, 2, \dots, n_i$ block groups within-airport i ; a_i is the distribution of the random effect; and between-airport is denoted as $\bar{X}_i = \sum_{j=1}^{n_i} X_{ij} \div n_i$ and within-airport as $(X_{ij} - \bar{X}_i)$.

Sensitivity analyses using traditional multivariable logistic regression with a categorical airport term (with both DNL and LAeqN contours) and Bayesian multiple logistic regression with a random intercept (with just the DNL contours) were conducted. In addition, we tested if results changed by controlling for distance to the airport, which allowed us to investigate whether the orientation of the noise contours (and flight patterns) led to exposure disparities or not. It may be that being within a certain distance to an airport is seen as a disamenity regardless of actual noise exposure. Airports could bring other disamenities, such as road traffic and associated traffic noise and air pollution. Univariable logistic models were generated for all variables tested (with both DNL and LAeqN contours). All regression modeling was conducted in R (version 3.6.3; R Development Core Team) using the lme4 package. Bayesian regression in R was conducted with the brms and rstan packages, which served as an interface to Stan (version 2.21.2; Stan Development Team).

Results

Table 1 details the characteristics of block groups for the exposure categories: unexposed, 45 to <55 , 55 to <65 , and ≥ 65 dB(A). Block groups included in our study had populations that were mostly non-Hispanic white, had at least a high school education (or GED), and had household incomes of $\geq \$75,000$. The calculated CVs for the block groups used in our analysis were categorized as medium and low (Table 2).

Figure 3 shows the mean-difference plots for the DNL 55-dB (A) threshold for all socially vulnerable race/ethnicity, educational

Table 1. Percentage of block group characteristics by exposure group.

Variables	Exposure group			
	<45 dB(A)	45 to <55 dB(A)	55 to <65 dB(A)	≥ 65 dB(A)
Race/ethnicity (%)				
Non-Hispanic black	16.4	18.6	19.7	25.7
Non-Hispanic Asian	8.1	8.5	9.0	2.7
Hispanic	21.9	26.8	32.3	38.9
Non-Hispanic other	3.1	3.0	2.9	3.1
Non-Hispanic white	50.6	43.1	36.0	29.6
Education (%)				
$<$ High school diploma or GED	14.1	17.0	20.5	23.9
High school diploma or GED	23.5	25.6	27.4	29.3
$>$ High school diploma or GED	62.4	57.4	52.1	46.8
Household income (%)				
$< \$25,000$	22.0	23.9	25.9	26.0
$\$25,000$ to $< \$50,000$	22.3	23.6	24.8	24.9
$\$50,000$ to $< \$75,000$	17.3	17.6	17.8	19.5
$\geq \$75,000$	38.5	34.9	31.4	29.6

Note: Educational attainment is based on the block group population ≥ 25 years of age. GED, General Education Development

Table 2. Percentage of data classified as high, medium, and low reliability based on the coefficients of variation (CV) for all block groups used in analysis.

Variables	High reliability (CV ≤12%)	Medium reliability (12% < CV ≤40%)	Low reliability (CV >40%)	Not available
Race/ethnicity (%)				
Non-Hispanic black	0.1	21.6	55.3	23.0
Non-Hispanic Asian	<0.1	11.4	54.1	34.4
Hispanic	0.2	25.0	61.9	12.9
Non-Hispanic other	<0.1	1.7	65.0	33.3
Non-Hispanic white	2.9	68.8	23.6	4.8
Education (%)				
<High school diploma or GED	<0.1	27.4	65.5	7.0
High school diploma or GED	<0.1	62.0	36.7	1.3
>High school diploma or GED	2.0	87.0	10.6	0.4
Household income (%)				
<\$25,000	<0.1%	39.1	56.9	3.9
\$25,000 to <\$50,000	0.0	42.2	55.7	2.1
\$50,000 to <\$75,000	0.0	34.0	62.9	3.2
≥\$75,000	0.3	61.4	35.1	3.2

Note: CV, coefficient of variation; GED, General Education Development.

attainment, and annual household income groups investigated. The socially vulnerable group with the largest mean of the mean differences between the exposed block groups and the mean of all block groups around the airport were Hispanics. On average, across 61 airports, the exposed groups' percentage Hispanic population was 3.1 [95% confidence interval (CI): 0.9, 5.3] percentage points higher than the mean of all block groups around the airport. The second largest mean of the mean differences was that of the group with only a high school education [2.9 (95% CI: 1.8, 3.9) percentage points higher than the mean of all block groups around the airport]. The mean of the mean differences was found to be above zero for all socially vulnerable groups, except non-Hispanic Asian populations, but there was variability across airports. For the same socially vulnerable group, some airports had positive mean differences (i.e., socially vulnerable groups were more likely to be exposed), whereas others had negative mean differences (i.e., socially vulnerable groups were less likely to be exposed). Both the DNL 45-dB(A) (Figure S1) and DNL 65-dB(A) (Figure S2) thresholds showed similar variability across airports, with the mean of the mean differences >0 for most of the socially vulnerable groups.

In multinomial multivariable analysis, odds ratio (OR) patterns were generally nonmonotonic with increasing exposure levels. Socially vulnerable groups tested had higher odds of being in block groups exposed to noise levels of DNL 45 to <55 dB(A) compared with block groups with DNL <45 dB(A) (Table 3). In addition, the socially vulnerable groups tested had higher odds of being exposed to DNL 55 to <65 dB(A) and to ≥65 dB(A), respectively, compared with block groups exposed to <45 dB(A) (Table 3), except for the percentage non-Hispanic Asian population, which showed lower odds at DNL ≥65 dB(A). For example, each 10-percentage point increase in a block group's non-Hispanic Asian population was associated with 13% (95% CI: 10%, 17%) increased odds of being exposed to DNL 55 to <65 dB(A) and with 51% (95% CI: 31%, 65%) decreased odds of being exposed to ≥65 dB(A), respectively, compared with block groups exposed to <45 dB(A). The largest odds were for Hispanic populations, where, for example, each 10-percentage point increase in a block group's Hispanic population was associated with 39% (95% CI: 25%, 54%) increased odds of being exposed to ≥65 dB(A) compared with block groups exposed to <45 dB(A). The odds were higher for block groups with a higher percentage of the population having only a high school diploma or GED and with annual household incomes of \$25,000 to <\$50,000 and \$50,000 to <\$75,000 than for block groups with a higher percentage of the population having less than a high school diploma or GED or annual household incomes of <\$25,000, respectively.

Results from the multivariable hybrid mixed-effect logistic model approach allowed us to determine which sociodemographic predictors were most strongly associated with exposure disparities and to separate within-airport effects from between-airport differences (Table 4). All socially vulnerable groups tested were observed to have higher odds of being exposed to noise levels at the DNL ≥45-dB(A) threshold (Table 4), similar to the multinomial model for populations exposed to noise levels of DNL 45 to <55 dB(A) compared with those exposed to DNL <45 dB(A). Again, the largest odds were for Hispanic populations, where each 10-percentage point increase in a block group's Hispanic population was associated with 13% (95% CI: 11%, 14%) increased odds of being exposed to higher noise. In addition, each 10-percentage point increase in a block group's population with annual household incomes of \$25,000 to <\$50,000 and \$50,000 to <\$75,000 were observed to have 6% (95% CI: 4%, 8%) higher odds of being exposed to noise levels at the DNL ≥45-dB(A) threshold.

Regressions using the DNL 55-dB(A) threshold resulted in generally similar trends as the DNL 45 dB(A) threshold, with non-Hispanic Asian and Hispanic populations most highly exposed, along with people with no college (Table 4). The largest odds were for people with only a high school diploma or GED, where each 10-percentage point increase in a block group's population with a high school diploma or GED was associated with 21% increased odds of being exposed to higher noise. Associations with household income were modest, as was the association with percentage non-Hispanic black.

Analyses for the DNL 65-dB(A) threshold yielded ORs with wider CIs, with positive associations remaining for Hispanic, lower education, and lower-income populations (Table 4). We also observed a strong inverse association with the percentage non-Hispanic Asian population, unlike what was seen for the 45- and 55-dB(A) thresholds. For all thresholds, results generally did not change even after controlling for a block group's distance to the airport (Table S1).

Our results were similar to those obtained by using alternative modeling approaches [i.e., traditional multivariable regression (Tables S2–S4) and Bayesian regression (Tables S5–S7)]. Again, results generally did not change even after controlling for a block group's distance to the airport. We also tested the socially vulnerable group terms with LAeqN thresholds of 45 and 55 dB(A) using traditional multivariable logistic approaches (there were no airports with ≥100 block groups available for analysis at the 65-dB(A) threshold). Generally, these contours were smaller but of the same shape as the DNL contours at the same airport. As such, the model results for LAeqN 45 dB(A) (Table S8) were similar to the model

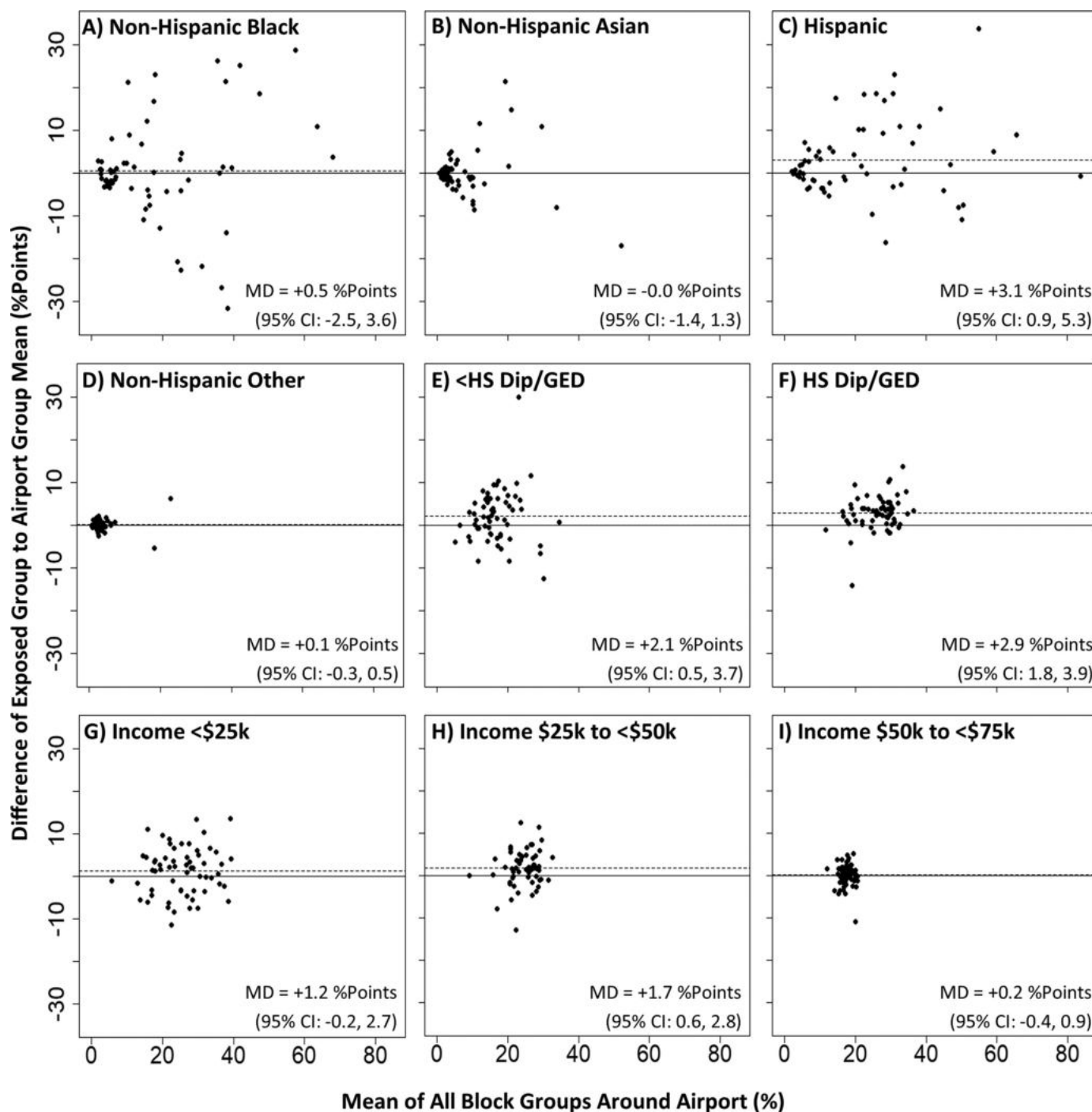


Figure 3. Mean-difference plots for socially vulnerable groups: (A) non-Hispanic black, (B) non-Hispanic Asian, (C) Hispanic, (D) non-Hispanic other, (E) no high school diploma or GED, (F) high school diploma or GED only, (G) annual household income <\$25,000, (H) annual household income \$25,000 to <\$50,000, and (I) annual household income \$50,000 to <\$75,000. In (A–I), each airport-specific relationship is represented by a point ($n_{\text{airport}} = 61$), where the x-axis is the mean of the percentage socially vulnerable group for all block groups within the maximum extent and the y-axis is the mean difference between the percentage exposed for the socially vulnerable group and the airport mean. Airports above the zero line were those found to have block groups with a greater percentage of socially vulnerable groups within the 55-dB(A) noise contour than the mean of all block groups around that airport (i.e., more exposed). Airports below the zero line were those found to have block groups with a lower percentage of socially vulnerable groups within the 55-dB(A) noise contour than the mean of all block groups around that airport (i.e., less exposed). Points along the zero line are airports where there is no difference in percentage socially vulnerable groups within the DNL 55-dB(A) contour (i.e., exposed) relative to the airport mean. Dashed lines represent the mean of the mean differences across all airports. Note: CI, confidence interval; DNL, day–night average sound level; GED, General Education Development; HS dip, high school diploma; k, thousand; MD, mean difference.

results for DNL 55 dB(A), and model results for LAeqN 55 dB(A) (Table S9) were similar to the model results for DNL 65 dB(A). However, there were some modest differences, including slightly stronger associations with education for LAeqN. Univariable

models with DNL contours (Tables S10–S12) and LAeqN contours (Tables S13 and S14), in general, had positive associations between noise exposure and socially vulnerable groups (i.e., the socially vulnerable groups were more likely to be exposed).

Table 3. Multinomial multivariable-adjusted odds ratios and confidence intervals [ORs (95% CIs)] for block group exposure to day–night average sound level (DNL) exposure groups (45 to <55 dB(A), 55 to <65 dB(A), ≥65 dB(A)) relative to base group (<45 dB(A)) for a 10% increase in percentage of block group with characteristic.

Variables (n = 90 airports; 74,253 block groups)	45 to <55 dB(A)	55 to <65 dB(A)	≥65 dB(A)
Race/ethnicity (%)			
Non-Hispanic black	1.05 (1.04, 1.06)	1.03 (1.01, 1.05)	1.15 (1.06, 1.24)
Non-Hispanic Asian	1.10 (1.09, 1.12)	1.13 (1.10, 1.17)	0.49 (0.35, 0.69)
Hispanic	1.13 (1.11, 1.14)	1.12 (1.09, 1.15)	1.39 (1.25, 1.54)
Non-Hispanic other	1.08 (1.03, 1.13)	1.12 (1.03, 1.22)	1.31 (0.92, 1.87)
Non-Hispanic white	Ref	Ref	Ref
Education (%)			
<High school diploma or GED	1.00 (0.98, 1.02)	1.09 (1.05, 1.14)	0.89 (0.75, 1.04)
High school diploma or GED	1.05 (1.03, 1.07)	1.19 (1.15, 1.23)	1.17 (1.01, 1.36)
>High school diploma or GED	Ref	Ref	Ref
Household income (%)			
<\$25,000	1.02 (1.01, 1.04)	1.04 (1.01, 1.07)	1.04 (0.92, 1.18)
\$25,000 to <\$50,000	1.05 (1.04, 1.07)	1.10 (1.06, 1.14)	1.08 (0.93, 1.25)
\$50,000 to <\$75,000	1.05 (1.03, 1.08)	1.09 (1.05, 1.14)	1.21 (1.02, 1.44)
≥\$75,000	Ref	Ref	Ref

Note: The main model was adjusted for variables on race/ethnicity, education, household income, and airport. GED, General Education Development; Ref, reference.

Discussion

Aggregated across airports, we observed higher odds of exposure to aircraft noise in census block groups with a higher percentage of socially vulnerable groups, including across race/ethnicity, education, and income. However, we observed considerable variability among U.S. airports in these patterns (Figure 3; Figures S1 and S2).

Our findings of higher odds of aircraft noise exposure in census block groups with higher percentage Hispanic populations were similar to results reported for some single airport studies. For example, Ogneva-Himmelberger and Cooperman (2010) investigated sociodemographic characteristics of aircraft noise exposure within a 21-km radius, the maximum extent of the 55-dB(A) contour, of Boston Logan International Airport for 1990 and 2000 and found high clusters of Hispanic populations concentrated in noise-affected areas, whereas high clusters of Black populations were concentrated outside the airport area. Sobotta et al. (2007) used a research design that was similar to our study design and also found disproportionate exposure to aircraft noise around an Arizona airport in census blocks with a higher percentage of Hispanic heads of household. The authors found a 25% increase in probability of being within a block group within the 65-dB(A) noise contour compared with being outside the 65-dB(A) contour with each

percentage increase in heads of households who are Hispanic. Although we were underpowered to observe associations with the 65-dB(A) noise contour, in part because aircraft engines were much quieter in 2010 (the year of our analysis) than they were in 1992 [the year of the analysis by Sobotta et al. (2007)], we did observe a 5% increase in the odds (per 10-percentage point increase in a block group's Hispanic population) of exposure to noise levels >55 dB(A) and 13% increase in odds of exposure to noise levels >45 dB(A) aggregated across multiple airports.

Further, our results are an aggregate of multiple airports across the United States, and we found substantial heterogeneity by airport (Figures 3; Figures S1 and S2). This heterogeneity may reflect varying histories on how and why airports were sited and how the areas evolved over time as influenced by local geography, zoning policies, and real estate practices. Although FAA oversees the procedural process for conducting noise studies, the planning and decision making related to aircraft noise impacts is made at the local level (Sobotta et al. 2007). Kruize et al. (2007) investigated road, rail, and air traffic noise exposures in the Netherlands and reported an indication of higher exposure with lower income only for road traffic noise. In London, UK, Tonne et al. (2018) found higher exposure to aircraft noise among those of the highest household income, White compared with Asian

Table 4. Within-airport odds ratios and confidence intervals [ORs (95% CIs)] for block group exposure to three different day–night average sound level (DNL) thresholds (i.e., three different models) for a 10% increase in percentage of block group with characteristic using multivariable hybrid mixed-effect logistic model with random intercept by airport.

Variables	Models		
	DNL 45 dB(A) (n = 86 airports; 74,170 block groups; 21,296 exposed)	DNL 55 dB(A) (n = 61 airports; 34,283 block groups; 3,476 exposed)	DNL 65 dB(A) (n = 15 airports; 4,031 block groups; 158 exposed)
Race/ethnicity (%)			
Non-Hispanic black	1.04 (1.03, 1.05)	0.98 (0.97, 1.00)	0.96 (0.89, 1.04)
Non-Hispanic Asian	1.11 (1.09, 1.12)	1.04 (1.00, 1.07)	0.44 (0.30, 0.66)
Hispanic	1.13 (1.11, 1.14)	1.05 (1.02, 1.07)	1.09 (0.96, 1.23)
Non-Hispanic other	1.09 (1.05, 1.14)	1.03 (0.95, 1.12)	0.82 (0.54, 1.25)
Non-Hispanic white	Ref	Ref	Ref
Education (%)			
<High school diploma or GED	1.02 (1.00, 1.04)	1.08 (1.04, 1.13)	1.08 (0.89, 1.30)
High school diploma or GED	1.07 (1.05, 1.09)	1.21 (1.17, 1.26)	1.11 (0.93, 1.32)
>High school diploma or GED	Ref	Ref	Ref
Household income (%)			
<\$25,000	1.02 (1.00, 1.03)	0.96 (0.93, 0.99)	0.99 (0.84, 1.15)
\$25,000 to <\$50,000	1.06 (1.04, 1.08)	1.01 (0.98, 1.05)	1.10 (0.92, 1.31)
\$50,000 to <\$75,000	1.06 (1.04, 1.08)	1.02 (0.98, 1.07)	1.17 (0.95, 1.43)
≥\$75,000	Ref	Ref	Ref

Note: Models were adjusted for variables on race/ethnicity, education, household income, and airport. GED, General Education Development; Ref, reference.

and other populations, and the lowest area-level income deprivation; higher exposure to rail noise with highest area-level income deprivation; and less pronounced socioeconomic and ethnic inequalities related to road traffic noise. Of note, Dreger et al. (2019) reviewed eight studies on noise and social inequality and found mixed results; however, the sources of environmental noise (e.g., road, rail, aircraft, industry noise) and their measurement and use (grouped or individual), as well as the measures and use (indicator or index) of social inequality, varied between studies. A study assessing environmental noise (not an aircraft-specific noise model) for the contiguous United States that used geospatially modeled sound levels, found that higher noise exposure was related to race/ethnicity, SES, and residential segregation (Casey et al. 2017).

We hypothesize that our findings of higher odds of being exposed to noise in census block groups with lower education levels may reflect that these groups may not have opportunity to move out of areas with high exposure (Phinney 2013). In addition, those of higher education may be more likely to have social networks and political connections that allow them to engage in civic organizations and political activism (Banzhaf et al. 2019; Collette 2011) to lobby for policies to lower exposure. Noise as a disamenity can also lower the value of land, or, the lower value of land, related to racism and segregation, could invite certain sectors (Sobotta et al. 2007). However, our observation of higher odds of exposure with greater percentage of population with household incomes \$25,000 to <\$75,000 and those with only a high school education (as compared with the lowest income and education attainment groups, respectively) living near an airport may be due to employment patterns, as well as housing market dynamics (Brainard et al. 2004; Lipscomb 2003; National Academies of Sciences, Engineering, and Medicine 2008).

We focused on three important DNL noise thresholds—45, 55, and 65 dB(A)—and found modest differences by threshold. Although some associations were consistent across thresholds, including with Hispanic status, others varied in interesting ways. For example, in multinomial analysis block groups with higher percentage non-Hispanic Asians had lower odds of exposure to aircraft noise ≥ 65 dB(A) when compared with the base group [i.e., block groups with exposure <45 dB(A)] but had higher odds of exposure to DNL 45 to <55 and DNL 55 to <65 dB(A). The hybrid mixed-effects regression analysis seemed to confirm that this group lives near airports but just outside the 65-dB(A) threshold. Conversely, in ordered multinomial models only, block groups with higher percentage non-Hispanic blacks showed higher odds of exposure to DNL 55 to <65 dB(A) and DNL ≥ 65 dB(A) compared with those exposed to DNL <45 dB(A). This may reflect less distinction in percentage non-Hispanic blacks with block groups exposed to DNL 45 dB(A) to <65 dB(A) than with block groups exposed to DNL <65 dB(A).

We chose to use buffers around airports that were the maximum extent of the noise contours as our areas of study. We also investigated a single year, and patterns may not hold over time—airplanes have become significantly quieter over the years (GAO 2020), so populations affected in 2010 may no longer be affected to the same extent (Ogneva-Himmelberger and Cooperman 2010; GAO 2020). Given that some groups may lack residential mobility or home ownership may change slowly, residential patterns in the 2010 unexposed block groups could be remnants of past exposure. As an alternative approach, we could have chosen a circle of equal area outside the maximum extent of the noise contours so the “unexposed” block groups would not include areas that are close to the airport and affected by distance; however, this method could have resulted in identifying differences more related to urbanization and land-use factors than airports. Differences in urbanization and

land-use factors could influence flight paths where flights may be directed over less densely populated areas. Another possible approach would have been to compare sociodemographics of those exposed with the sociodemographics of the corresponding metropolitan statistical area (MSA). The MSA delineates metropolitan areas composed of an urban area with a population nucleus of $\geq 50,000$ inhabitants along with adjacent communities that are significantly economically and socially connected (U.S. Census Bureau n.d.-e). However, our method allowed us to examine more geographically proximate populations to control for broader population differences and facilitated comparability with other studies (Sobotta et al. 2007).

Our study had several limitations. We used DNL, which is an annualized noise exposure metric based on a typical 24-h day, as the basis of our primary regression models. However, this may not be the ideal metric associated with annoyance or health effects, and some have suggested that other noise metrics, such as number of aircraft overflights, are more correlated with annoyance than DNL (Collette 2011). Those with DNL below, for example, 65 dB(A), could have periods of exposure within a given year that are >65 dB(A). This is particularly true for areas surrounding airports with intersecting runways designed to accommodate expansion or variable wind direction (Yu and Hansman 2019). In the latter scenario, residents along the flight path that is used for the less frequent wind direction could have periods of high aircraft noise exposure equal to those along the path of the primary runway; however, their annualized exposure could be below the threshold. Our investigation of nighttime noise levels (LAeqN), though, showed similar results to the DNL analysis.

Using census block group-level data raises the issue of the precision of the sociodemographic distribution of the populations within a block group (Banzhaf et al. 2019; Jones et al. 2014). ACS data at the block group level can have large standard errors; the distribution of CVs we calculated for the block groups used were largely categorized as having medium and low reliability. Aggregating data, either by attribute or geography, is a simple approach to reducing the standard error but it comes at the cost of lowering the resolution of population sociodemographics and exposure assignment (Spielman et al. 2014). We chose to analyze noise exposures without aggregating ACS data geographically; however, future analyses could be done to see if the patterns that we found hold using tracts or larger geographic units. In addition, the size of the area delineating the block groups could vary around airports; for example, they could be smaller in very densely populated areas (Banzhaf et al. 2019), which was not accounted for in our analysis. However, our intention was not to make inferences about individuals (Idrovo 2011) but, rather, to elucidate noise exposure patterns at the population level. Utilizing larger geographic units would have implicitly assumed uniform patterns within, for example, census tracts instead of block groups, which would have contributed error given the relative steep gradients of some noise contours.

Relatedly, in overlaying noise contours with census block groups, there are some block groups with part of the block group inside the noise contour area and part outside the area. We made the decision that if $\geq 50\%$ of the (land) area of that block group was within the noise contour then the entire census block group would be considered exposed. The noise exposure models excluded helicopter operations, which can be a major source of aviation noise in certain communities, such as those surrounding trauma centers. Although peer-reviewed guidance for integrated modeling techniques for predicting fixed-wing aircraft noise is well established, such guidance is yet to be stipulated for predicting helicopter noise (Page 2016). Our analyses did not account

for noise abatement measures, which may be important when thinking about noise exposure rather than ambient sound levels. We did not report on patterns of racial segregation (Morello-Frosch 2002), which may be an important aspect of the sociodemographic patterning of noise exposure in the United States. More generally, we relied on racial and ethnic categorizations from the census, but these data have limitations and do not fully capture the root causes of exposure differentials related to racism, racial discrimination, and racial segregation (Payne-Sturges et al. 2021). In addition, there is a complex relationship between race/ethnicity and SES (Williams et al. 2016), and although we controlled for both in the same model, we did not evaluate effect measure modification.

In spite of these limitations, our study offers multiple novel insights. To our knowledge, we have performed the first evaluation of sociodemographic patterning of aircraft noise exposure across multiple (90) U.S. airports. In addition, the noise modeling for the 90 airports was performed in parallel with similar model inputs and assumptions using a regulatory-approved software (i.e., AEDT). The inclusion of multiple airports using a common analytical approach gave us more power to detect differences and makes the study more generalizable. We also applied statistical techniques that accounted for clustering around airports and explored within- and between-airport differences, and our results were robust across various regression approaches. Our study highlighted that there was considerable heterogeneity between airports, reinforcing that results from single- or few-airport studies should not be extrapolated to the entire United States. Our analysis was at the block group level, and not at the level of larger geographic units (e.g., counties). At higher geographic levels, if segregation exists between the geographic units or if the boundaries of geographic units are systematically gerrymandered, associations between noise exposure and sociodemographics could be overestimated (Banzhaf et al. 2019).

Conclusion

We found that, in pooled multivariable analysis, increasing higher exposure categories of DNL 45 to <55, 55 to <65, and ≥65 dB(A) relative to a base category of <45 dB(A) and DNL noise exposures above the 45-dB(A) and 55-dB(A) thresholds were positively associated with block groups with higher percentages of socially vulnerable populations; however, there was substantial heterogeneity in associations by airport. Understanding these patterns and differences in noise exposure is important for nationwide studies on the associations of noise and health, especially given potential confounding in such studies. Airport-specific associations can provide valuable insight for local policy makers considering environmental justice issues but should not be generalized to other airports or nationally given heterogeneity in the associations.

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How Noise Travels (Fast)

The distance over which a sound, measured in decibels (dB), can affect a nearby resident depends on several factors, including:

1. **Sound Level (dB):** The initial intensity of the sound source.
2. **Distance:** Sound intensity decreases as it travels away from the source due to the **inverse square law**.
3. **Environmental Factors:** Obstacles, vegetation, weather conditions, and ground absorption.
4. **Frequency of Sound:** Low-frequency sounds travel farther than high-frequency ones.

General Estimation of Audible Ranges

Sound intensity drops by approximately **6 dB for every doubling of distance in open air**. Here's an approximate idea of how far different sound levels can be heard under typical conditions in a rural or peri-urban setting:

Sound Level at Source (dB)	Distance Heard (in km)	Effect at the Distance
120 dB (e.g., jackhammer)	~1-2 km	Very loud, potential for disturbance
85-90 dB (e.g., heavy machinery)	~1 km	Loud, can cause irritation
70 dB (e.g., busy road traffic)	~500 meters to 1 km	Moderate disturbance depending on ambient noise
50-60 dB (e.g., conversations)	~200-500 meters	Minimal impact unless very close

Permissible Distance Under EHS Guidelines

The **World Bank/IFC EHS Guidelines for Noise Management** recommend limiting daytime noise levels at sensitive receptors (e.g., residences, schools) to **55 dB(A)** and nighttime levels to **45 dB(A)**.

Estimating Permissible Distance

To estimate the permissible distance at which noise levels comply with these standards:

1. **Start with the source noise level** (e.g., 85 dB at 1 meter from machinery).
2. **Apply the inverse square law:**

$$L_2 = L_1 - 20 \times \log_{10} \left(\frac{r_2}{r_1} \right)$$

where:

- L_1 : Source noise level in dB
- L_2 : Noise level at the distance of interest
- r_1 : Initial reference distance (e.g., 1 m)
- r_2 : Distance from the source in meters

3. Solve for r_2 to find the permissible distance where $L_2 \leq 55$ dB during the day or $L_2 \leq 45$ dB at night.

Practical Example

Purpose-built for displays of data

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$$V_2 = V_1 - 20 * \log_{10}(d_2/d_1)$$

$$V_1 = 140\text{dB at } d_1=1\text{m}$$

→ $V_2 = 82\text{dB}$ at the school, which is 800m away

Realistically, a jet engine's volume is measured about 10m away.

With $d_1=10\text{m}$, $V_2 = 102\text{dB}$ at the school, which is 800m away.

On average, volume about 800m away will be between 80-100dB.

APPEAL 2

**APPELLANT: ENS AFRICA ON BEHALF OF COUNTY FAIR, A DIVISION OF
ASTRAL OPERATIONS LIMITED**

DATE RECEIVED:
18 NOVEMBER 2025



APPEAL FORM

In terms of the National Appeal Regulations

April 2019

Form Number: 2019

Note that:

1. This appeal must be submitted within **20 days** of being notified of the decision.
 2. This form is current as of **April 2019**. It is the responsibility of the Appellant to ascertain whether subsequent versions of the form have been released by the Appeal Administrator.
 3. This form must be used for appeals submitted in terms of National Appeal Regulations, 2014 in so far as it relates to decisions in terms of the:
 - a. Environment Conservation Act, 1989 (Act No. 73 of 1989);
 - b. National Environmental Management Act, 1998 (Act No. 107 of 1998);
 - c. National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004);
 - d. National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004);
 - e. National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008); and subordinate legislation made in terms of these laws.
 4. The required information must be inserted within the spaces provided in the form. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. The spaces may be expanded where necessary.
 5. Unless protected by law, all information contained in, and attached to this application, will become public information on receipt by the Department.
 6. A digital copy of this form may be obtained from the Department's website at <http://www.capecapeway.gov.za/dept/eadp>.
 7. Please consult the National Appeal Regulations (dated 8 December 2014) and the Department's Circular EADP 0028/2014 on the "One Environmental Management System" and the EIA Regulations (dated 9 December 2014), and any other relevant regulations.
-

A. DECISION BEING APPEALED

1. Reference Number of the Decision being appealed:

EIA REFERENCE : 16/3/3/2/A5/20/2046/24 NEAS REFERENCE : WCP/EIA/0001497/2024

2. Type of Decision being appealed (please circle the appropriate option):

Environmental Authorisation	24G Administrative Fine	Amendment of Environmental Authorisation	Amendment of Environmental Management Programme	Waste Management Licence	Atmospheric Emission Licence	Exemption Notice
Permit in terms of NEM: BA	Administrative Notice/ Directive	ECA: OSCA Permit	Other			

2. Brief Description of the Decision:

Environmental Authorization for the proposed expansion of the existing 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

4. Date of the decision being appealed (i.e. date on which the decision was made):

27 October 2025

B. APPELLANT'S INFORMATION

5. Please circle the appropriate option

Applicant	State Department / Organ of State	Interested and Affected Party

6. Appellant's information:

Name: County Fair, a Division of Astral Operations Limited

Address: care of **Edward Nathan Sonnenbergs** (reference J Brand/0532612)
35 Lower Long Street, Foreshore, Cape Town

Tel: 021 410-2500

Cell: 079 8777778

Fax:

Email: jbrand@ensafrica.com

C. APPEAL INFORMATION

7. Did you lodge an Appeal submission within 20 days of the notification of the decision being sent to you?

☒ **Yes**

/

No (Circle the appropriate response). If "Yes", attach a copy herewith.

8. The following documents must accompany the appeal submission, kindly indicate if they have been attached to the submission:

- 8.1 a statement setting out the grounds of appeal?;

☒ **Yes**

/

No (Circle the appropriate response)

- 8.2 supporting documentation which is referred to in the appeal submission?;

☒ **Yes**

/

No (Circle the appropriate response)

- 8.3 a statement, including supporting documentation, by the appellant that a copy of the appeal was submitted to the applicant, any registered interested and affected party and any organ of state with interest in the matter within 20 days from:

- 8.3.1 the date that the notification of the decision was sent to the registered interested and affected parties by the applicant.

☒ **Yes**

/

No (Circle the appropriate response).

Please indicate the date on which a copy of the Notice of the decision was sent. Notice of decision received per email from PHS Consulting on 30 October 2025. Please see attached statement (page 7 of this form) in satisfaction of the requirements of Regulation 4(2)(b) of the National Appeal Regulations, 2025.

OR

- 8.3.2 the date that the notification of the decision was sent to the applicant by the competent authority, issuing authority or licensing authority.

Yes

/

No (Circle the appropriate response).

Please indicate the date on which a copy of the Notice of the decision was sent. _____

D. GROUNDS OF APPEAL

9. Set out the ground/s of your appeal: Clearly list your appeal issues and provide an explanation of why you list each issue.

Grounds of Appeal are fully set out in the accompanying letter from ENS dated 18 November 2025 in paragraphs 1 to 8 thereof

- 9.1 Is your appeal based on factors associated with the process that was followed by the applicant/Environmental Assessment Practitioner/Competent Authority in reaching the decision?

Yes / **No** (Circle the appropriate response). Please provide details.

- 9.2 Is your appeal based on factors associated with matters of unacceptable environmental impacts/extenuating circumstances not taken into account by the Competent Authority?

Yes / **No** (Circle the appropriate response). Please provide details.

As fully set out in the accompanying letter from ENS dated 18 November 2025 in paragraphs 1 to 8 thereof

9.3 Have your appeal issues been raised previously in the public participation process? :

☒ **Yes**

/ **No**

(Circle the appropriate response). Please provide details.

Comments were made at each stage of the public participation process and were contained in the following letters from ENS to PHS Consulting : 07/12/2023 (on the pre-application draft scoping report); 23/08/2024 (on the in-process draft scoping report); 13/01/2025 (on the draft EIA report); and 13/05/2025 (on the amended in-process draft EIA report).

9.4 Are you fundamentally opposed to the decision (e.g. to any development activity on the site)?

☒ **Yes**

/ **No**

/ **Not applicable**

(Circle the appropriate response). Please provide details.

As fully set out in the accompanying letter from ENS dated 18 November 2025 in paragraphs

1 to 8 thereof

9.5 Are you in favour of the decision if your concerns can be remedied by rectifying the process or by mitigating or eliminating an impact/s of the activity/ies?

Yes

/ ☒ **No**

/ **Not applicable**

(Circle the appropriate response). Please provide details.

As fully set out in the accompanying letter from ENS dated 18 November 2025 in paragraphs

1 to 8 thereof

9.6 Please indicate what measures you propose to have your concerns remedied.

While the Appellant objects to the proposed expansion of the Cape Winelands Airport, if all the landside activities were to be developed to the east of the proposed new runway, and the alternative measures listed in paragraph 8 of the accompanying ENS letter dated 18 November 2025, are implemented, the Appellant's operations on its farms may be able to coexist alongside an expanded airport.

9.7 Does your appeal contain any new information that was not submitted to the Environmental Assessment Practitioner (EAP) / or registered I&APs/ or the competent authority prior to the decision?

Yes / **No** (Circle the appropriate response). If the answer above is "Yes" please explain what this information is and why it should be considered by the Appeal Authority and why it was not made available to the EAP/ or I&AP/ or the competent authority prior to the decision. (Please ensure that the new information is attached hereto.)

E. SUBMISSION ADDRESS

This appeal must be submitted to the Appeal Administrator at the address listed below within 20 days of being notified of the decision:

By post: Attention: Marius Venter
Western Cape Ministry of Local Government, Environmental Affairs &
Development Planning
Private Bag X9186, Cape Town, 8000; or

By facsimile: (021) 483 4174; or

By hand: Attention: Mr Marius Venter (Tel: 021-483 3721)
Room 809, 8th floor Utilitas Building
1 Dorp Street, Cape Town, 8000; or

By e-mail: DEADP.Appeals@westerncape.gov.za

Note: You are also requested to submit an electronic copy (Microsoft Word format) of the appeal and any supporting documents to the Appeal Administrator.



Appellant's signature

18 November 2025

Date

**STATEMENT IN TERMS OF REGULATION 4(2)(b) OF THE NATIONAL APPEAL REGULATIONS, 2025,
CONFIRMING THAT A COPY OF THE APPEAL WAS SUBMITTED TO THE APPLICANT**

It is hereby confirmed that a copy of this appeal form, together with a copy of the letter from Edward Nathan Sonnenbergs dated 18 November 2025 has been submitted to the Applicant care of PHS Consulting, on the following email address : amanda@phsconsulting.co.za

DATED at CAPE TOWN on this the 18th day of NOVEMBER 2025



James Austin Brand



35 Lower Long Street
Foreshore Cape Town 8001
P O Box 2293 Cape Town South Africa 8000
Docex 14 Cape Town
Tel +2721 410 2500
info@ENSafrica.com
ENSafrica.com

The Appeal Administrator
Department of Environmental Affairs & Development Planning

J Brand / 0532612 our ref
16/3/3/2/A5/20/2046/24 your ref
18 November 2025 date

Per email to DEADP.Appeals@westerncape.gov.za

ATTENTION : MR MARIUS VENTER

Dear Sirs

RE: APPEAL AGAINST THE GRANT OF AN ENVIRONMENTAL AUTHORISATION TO CAPEWINELANDS AERO (PTY) LIMITED FOR THE PROPOSED EXPANSION OF THE EXISTING CAPE WINELANDS AIRPORT ON PORTION 10 OF FARM NO. 724, REMAINING EXTENT OF FARM NO. 724, PORTION 23 OF FARM NO. 724, PORTION 7 OF FARM NO. 942, REMAINING EXTENT OF FARM NO. 474, PORTION 3 OF FARM NO. 474 AND PORTION 4 OF FARM NO. 474, FISANTEKRAAL, DURBANVILLE

Introduction

We act for County Fair, a division of Astral Operations Limited, which was registered as an Interested and Affected Party (I&AP) during the EIA process which led to the abovementioned authorisation. On the basis of the grounds set out below, our client has mandated us to lodge this appeal on its behalf. This letter will be submitted simultaneously with your Department's prescribed appeal form and as such, forms part thereof.

Because we are aware that the final EIA report and its supporting annexures run to some 3,878 pages, we thought it would be useful for you when considering our client's appeal to set out our client's location in relation to the abovementioned properties forming part of the proposed expanded airport. Our client owns and operates a poultry laying facility on Portion 2 of Farm Lichtenburg 175 and Portion 9 of Erf 724 Joostenbergvlakte. Our client's farm is immediately adjacent and to the west of the existing Fisantekraal airfield and thus immediately adjacent to the proposed expansion of the Cape Winelands Airport. A portion of our client's operation can be seen from the image reflected on page 15 of the Environmental Authorisation (EA) and from the second locality map in Annexure 1 to the EA. Our client's operation therefore stands to be directly impacted by the proposed expanded airport which has now been authorized in terms of the EA granted.

Grounds of Appeal

1. In the reasons for the decision set out in Annexure 4 to the EA, the issue of poultry biosecurity and impacts is dealt with in paragraph 3.9 on pages 48 and 49 of the EA. It is clear from what is set out in those paragraphs that reliance has been placed solely on the Biosecurity and Poultry Health Study by Dr Deryn Petty. Although Dr Petty did address some of the concerns which we raised on our client's behalf during the various phases of the EIA process (such as her agreement to exclude chicken manure as a feedstock for the proposed biodigester), it would seem that insufficient consideration was given to the input by our client's own veterinary expert, Dr Obed Lukhele. His report dated 29 November 2024 was annexed to the comments we submitted on 13 January 2025, and for your ease of reference, a further copy thereof is attached hereto, marked "A".
2. Furthermore, we commented on the inadequacy of her revised report in the comments which we submitted on the amended draft EIA report dated 13 May 2025 and draw your attention in particular to paragraphs 33 and 34 on page 10 and following of those comments. In addition, and because we were concerned with how the environmental assessment practitioner dealt with our comments as set out in our letter of 13 May 2025, we were constrained to address an urgent letter directly to your Department on 6 August 2025 and a copy of that letter is attached hereto marked "B".
3. The concluding paragraph on page 49 of the EA demonstrates our client's assertion that insufficient consideration was given by the Competent Authority who considered the application for the EA as you state *"the Biosecurity, Poultry Health Study concluded that with suitable mitigation measures it should be possible for the said poultry breeder farm and the proposed airport to coexist."* A proper consideration of our client's repeated comments as well as the report by Dr Lukhele, puts the doubt into this "possibility". Inasmuch as our client's operations have been in existence for some 58 years and supplies approximately 38% of our client's broiler stock in the Western Cape, the Department ought to have worked with "probabilities" rather than mere "possibilities".
4. We note the references in paragraph 3.9 of the EA to various conditions, some of which we will deal with hereunder, and whilst some of the conditions go some way to addressing some of our client's concerns, the landside developments being immediately adjacent to and in very close proximity to our client's nearest chicken houses, remain concerns that have been inadequately addressed. In summary, our client contends that it will not be possible for the expanded airport and its poultry operations on its farm to coexist.
5. The reasons for the decision to grant the EA commences on page 31 thereof and it is stated that in reaching its decision, the Competent Authority considered, *inter alia*, *"(d) the comments received from I&APs and the responses thereto, included in the final BAR"*. From what we have set out above and in what follows, it is clear that the Competent Authority could not have adequately considered our client's comments in reaching its decision.

6. We note also, in passing, that in paragraph (f) on page 31, reference is made to a site visit having been conducted on 22 October 2025, a mere 5 days before the EA comprising 66 pages was issued. This begs the question as to the purpose of that site visit and whether anything gleaned thereat contributed to the EA which our client respectfully submits, was probably fully drafted and almost ready to be issued by then. This observation lends further support to our client's contention that inadequate consideration was given to its concerns by the Competent Authority.
7. The EA imposes a number of conditions which will impact on our client's operations and no opportunity exists for our client to comment thereon. These outstanding aspects ought to have been addressed by the applicant during the EIA process in order to enable I&APs like our client to deal therewith. The conditions we are referring to are the following :
 - 7.1. Condition 29 deals with the need to address a number of aspects including fencing, walls, entrances and boundary interfaces, and lighting, all of which must be submitted as part of the Urban Design Guidelines to the City of Cape Town for approval/input and must be submitted to the Competent Authority with the comments obtained for record purposes prior to the commencement of earthmoving or construction activities. Light pollution was identified as a major concern for our client's laying stock and even the authors of the Visual Impact Assessment conceded that the absence of an approved lighting design made it difficult for them to fully comment on the impact that the substantial lighting required by the expanded airport would have on our client's laying stock.
 - 7.2. Condition 30 deals with the need to implement a Groundwater Monitoring and Management Plan which must be approved by the National Department of Water and Sanitation and be submitted to the Competent Authority for record purposes prior to the operation of Phase 1 of the development. Our client as a groundwater user would surely need to have an opportunity to comment on the adequacy or otherwise of the Monitoring and Management Plan and no provision is made for any consultation with our client as a condition of the EA.
 - 7.3. Condition 31 deals with the need for a Dust Management Plan which is still to be approved by the relevant authority (by which we assume the City of Cape Town) to be implemented and submitted to the Competent Authority for record purposes prior to the commencement of earthmoving and construction activities. Our client's concern with dust was recognised even by Dr Petty and here again there is no provision for our client to comment on the Dust Management Plan so as to ensure that its concerns are adequately addressed.
 - 7.4. Condition 32 deals with the need for a Water Scarcity Management Plan being developed by a suitably qualified specialist to mitigate water scarcity risks and its implementation. Here too this plan must be submitted to the Competent Authority prior to the commencement of earthmoving and construction activities. Our client, as a sensitive water user, would surely need to comment on this plan and no provision has been set out in the conditions for this to occur.

- 7.5. In Condition 40.1, it is provided that an Overall Lighting Report must be prepared by a suitably qualified electrical engineer and must be implemented. This approved overall lighting report that incorporates comments from the City of Cape Town, must be submitted to the Competent Authority with the comments obtained prior to the commencement of earthmoving construction and activities. Inasmuch as lighting has been recognised even by Dr Petty as being problematic for our client's operations, the fact that no provision is made for engaging with our client on such a report represents a serious omission on the part of the Competent Authority. The same applies to the condition in Condition 40.2.
- 7.6. In Condition 42.1, the need for a certified Pest Control Company to be appointed at the onset of construction and operational phases to ensure that preventative measures are put in place, is noted. Because open composting is envisaged for the development, we made available when we commented on the amended draft EIA report, a copy of a report by Prof. Daniel Barry which related to a different project for which environmental authorisation was obtained and in which he dealt with what needed to be implemented for the management of, in particular, flies. Accordingly, our client would need to see the proposed preventative measures by the appointed Pest Control Company to ascertain whether the proposed measures would be effective and whether they would align with what Prof Barry had recommended in similar circumstances.
- 7.7. In Condition 46, a Noise Mitigation and Management Plan with measurable goals to prevent and intricately manage noise emissions from the operational phase of the development must be compiled and implemented and submitted to the Competent Authority prior to the commencement of any earthmoving or construction activities. Notwithstanding the opinion expressed in the Noise Impact Assessment Report dated June 2025 compiled by DDA Environmental Engineers, that the noise cones will not impact on our client's operations, both Drs Petty and Lukhele recognise that the excessive and sudden noises of the larger aircraft landing and taking off impact negatively on our client's laying stock, with Dr Petty raising the rather absurd opinion that our client's laying stock will become habituated to such excessive noise. Her opinion is based on studies conducted on turkeys and no indication has been given as to how those studies would relate to chickens. On the contrary, and based on Dr Lukhele's input, our client could sustain severe losses occasioned by the poultry attempting to escape the noise and trampling each other causing mortalities. This was fully addressed in all our comments submitted and appears to have been ignored by the Competent Authority.
- 7.8. All these conditions refer to documentation still to be prepared and in respect of which there is no provision for an opportunity for our client to engage on. While these conditions are clearly well intended, without our client being afforded an opportunity to comment on these various studies still to be carried out, our client has no way of knowing whether its concerns in regard to these aspects, will be adequately addressed or not.

8. In these circumstances, our client respectfully submits that the Competent Authority's grant of the EA is not only premature, but is also biased in favour of the applicant for the EA. Accordingly, our client submits that the EA be set aside. Alternatively, and in the event of our client's appeal being dismissed, our client respectfully requests the Appeal Authority to suspend the EA until such time as :

- 8.1. the documentation referred to in paragraph 7 above is procured;
- 8.2. subjected to a round of public participation to enable comments of I&APs, including our client, to be obtained; and
- 8.3. amending the conditions of the authorisation in accordance with the comments received.

Yours faithfully

EDWARD NATHAN SONNENBERGS INC.

A handwritten signature in black ink, appearing to read 'James Brand', is written over the company name.

Per: James Brand

DIVISIONAL OFFICE

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 www.astralfoods.com



29 November 2024

To:

Mr Stephen Levetan

Executive Consultant: Natural Resources and Environment
 Edward Nathan Sonnenbergs
 Cape Town
 8001

Per email: slevetan@ensafrica.com

CC: Messrs Gary Arnold, Kenny Schoeman, Alewyn Carstens and Henning Olivier

Re: Veterinary comment to the biohazard assessment report – Building a commercial airport next to Fisantekop broiler breeder complex farm

I refer to your email dated 21 November 2024 requesting my comment to Dr Deryn Petty's Poultry Biohazard Assessment ("Appendix 39") titled the "IMPACT OF PROPOSED DEVELOPMENT OF AN AIRPORT IN THE CAPE WINELANDS ON POULTRY BIOSECURITY AND HEALTH".

Background

The Fisantekop broiler breeder farm complex is composed of four (4) sites of six (6) houses each. These sites are Fisantekop, Wheatlands, Quarryside and Vergelee and together house a total of about 162 000 birds that produce hatching eggs for County Fair, a subsidiary of Astral Operations Ltd.

The Fisantekop complex was built in 1970. The urban encroachment got closer to the commercial farms over the years and, as a result, the near-by informal human settlement was built in 1996. The nearest site to this human settlement, which is on the West, is Quarryside that is located about 440 meters away. The closest building of the proposed Cape Wineland Airport (CWA) will be about 270 meters from Vergelee.

Comments

The aim of this biohazard assessment was *"to investigate and as far as possible quantify the effect of a new airport on the adjacent poultry farms, focusing on those aspects that will affect the biosecurity of a poultry farm and the health of the poultry"*.

The following were key concerns raised in this biohazard assessment report:

1. *"..... There are four different parent flocks in close association with each other on this complex. The distance between the breeder flocks is certainly less than recommended for good biosecurity" (page 7).*

ASTRAL OPERATIONS LIMITED (Reg. No. 1947/027453/06)

Executive Committee: CE Schutte (Chairman) GD Arnold JAI Ferreira G Jordaan OM Lukhele N Moodley E Potgieter G Pretorius
 A Rambally MJ Schmitz CJ Smith FG van Heerden LCF Vermaas GPB Visser

Directors: CE Schutte (CEO) GD Arnold JAI Ferreira OM Lukhele N Moodley E Potgieter

Company Secretary: L Marupen

The broiler breeder birds that are placed on each of these sites originate from County Fair's rearing farms that are all under the health care of the in-house veterinarian. These birds, both in rearing and laying, are exposed to the same health and disease monitoring programmes. It was shown in Europe that biosecurity is complied with more in breeders (87%) and, on farms under contract with a company (82.5%) compared to independent farms (79.5%)¹.

2. *"However, it must be borne in mind that the biosecurity is already compromised by its situation close to a main road as well as a settlement"* (page 27).

The Biosecurity Procedures in Poultry Production, Chapter 6.5.1, of the OIE Terrestrial Animal Health Code was first adopted in 1982². This was at least twelve (12) years after the Fisantekop complex was built. Discouraging the location of poultry farms closer to the public roads became a relevant conceptual biosecurity phenomenon after Fisantekop was already built. The informal human settlement was established about twenty-six (26) years after the Fisantekop complex was built.

The biosecurity risks that are associated with the main road (220 meters) and the informal human settlement (440m from Quarryside) were mitigated through various management / operational and physical pillars of biosecurity. The anticipated fold-reductions in highly pathogenic avian influenza (HPAI) risk infections in relation to the four levels of biosecurity has been demonstrated whereby preventing access to waterbodies reduced the risk of HPAI virus entry into the farm three (3) fold, routine daily biosecurity (boot disinfection, limiting visitors, rodent control, clean feed and water) resulted in four-fold reduction, while housing reduced the risk two-fold and, all that's been mentioned prior plus showering, no visitors and dedicated staff and equipment limiting the risk forty-four fold⁴.

3. In Figure 2 (page 10), *"The six ponds that will be developed to channel water from the site are shown; however, it is important to note that five out of six ponds are dry ponds and, as a result, will not attract birds."* It is further stated on page 11 that *"Pond No. 2 is the closed quarry in the process of rehabilitation, which will hold 95,000 liters of surface water. If not carefully managed, this pond may attract birds."* and *"Figure 3 indicates that the quarry will be used for rainwater storage, and if rehabilitated, it may attract wild birds"*.

The development of the CWA closest (270m from Vergelee) to the Fisantekop complex will **increase biosecurity risks** due to the rain water that will accumulate in the ponds (five dry and one rehabilitated) as well as in the quarry resulting in more wild bird population drawn closer to the Fisantekop complex. Farms that are located less than 500 meters from water bodies with high number of migratory birds had higher risk of being infected with the HPAI virus⁴. The wild birds are known to carry and transmit various infectious diseases such as the HPAI. The anticipated fold-reductions in HPAI risk infections in relation to the four levels of biosecurity⁴ also applies here.

4. **Abiotic stressors** such as temperature, noise and light result in compromised **health** (welfare), bird behaviour, growth and productivity of poultry³.

ASTRAL OPERATIONS LIMITED (Reg. No. 1947/027453/06)

Executive Committee: CE Schutte (Chairman) GD Arnold JAI Ferreira G Jordaan OM Lukhele N Moodley E Potgieter G Pretorius
A Rambally MJ Schmitz CJ Smith FG van Heerden LCF Vermaas GPB Visser

Directors: CE Schutte (CEO) GD Arnold JAI Ferreira OM Lukhele N Moodley E Potgieter

Company Secretary: L Marupen

The assessment report only made mention of the intensity (levels) of noise. The duration of noise and its ability to cause vibration was not considered. In this report, three scenarios were mentioned and it was concluded that *“All scenarios remain below the 80 dB level associated with harm to poultry and are only slightly higher than current levels”*.

Small changes of 10 dB is enough to have a significant impact in inducing tonic immobility (TI) or fear duration⁵. A single short stress due to aircraft noise did not affect egg production but exposure of the birds to the noise stress for a period of three to four days reduced egg production⁵. The fear in hens was increased when exposed to noise intensity of 90 dB that was caused by trains, trucks and aircraft for one (1) hour compared to hens that were housed in the environment with 65 Db sound³.

Vibration stress physiology is closely related to noise stress as they are both energy waves³. The location of animal farms near workshops, railways, construction sites and other such areas induce stress from ground-borne vibrations³. Sound vibrations greater than 1.0 cm s⁻¹ had a negative effect on egg production³.

5. Lighting

The intensity, wavelength and duration of lighting from the airport has not been quantified. A photoperiod of 23 hours of light elevated stress and fear in the Ross 308 broiler³. This prolonged exposure of birds to light disrupted the circadian clock gene expression and the microbiome diversity in the caeca in the Hy-line layer chicken³ and, has thus negatively impacted egg production and gut health of these birds.

The flicker sensitivity of domestic poultry induces discomfort and stress within the frequency range of 39-71 Hz and under the light intensity of 10-1 000 Lux³. The long wavelength (nm) of 660nm (red light) increased egg production in Cobb broiler breeders^{3,6}.

Conclusion

The proximity of the Fisantekop broiler breeder complex farm to the public road and to the informal settlement are not due to poor compliance with conceptual biosecurity by County Fair. The informal settlement was established about twenty-six (26) years after the farm was built. The Biosecurity Procedures in Poultry Production as outlined by the World Organisation for Animal Health (WOAH, formerly OIE) was only adopted twelve (12) years after building the farm. Developing an airport next to the Fisantekop laying farm will continuously expose the birds to **abiotic stressors** and **compromise their health and welfare**. In addition, the shortcomings mentioned earlier in conceptual biosecurity will be **compounded**. The latter effect has been demonstrated through the fold-reductions in HPAI risk infections in relation to the four levels of biosecurity, namely, prevention of access to waterbodies, housing, routine biosecurity and high biosecurity level that includes showering, no visitors as well as dedicated staff and equipment.

The abiotic stressors can lead to negative changes in metabolism, bird behaviour and immunity that result in compromised bird health, welfare and even mortality. All components of light and noise must be addressed. This includes vibrations and duration of noise as well as the intensity, wavelength and duration of lighting from the CWA have not been quantified or made-mention of in the biohazard assessment report.

ASTRAL OPERATIONS LIMITED (Reg. No. 1947/027453/06)

Executive Committee: CE Schutte (Chairman) GD Arnold JAI Ferreira G Jordaan OM Lukhele N Moodley E Potgieter G Pretorius
A Rambally MJ Schmitz CJ Smith FG van Heerden LCF Vermaas GPB Visser

Directors: CE Schutte (CEO) GD Arnold JAI Ferreira OM Lukhele N Moodley E Potgieter

Company Secretary: L Marupen

The prevailing winds during the construction phase requires more attention to help alleviate the impact of dust, noise and other abiotic risk factors.

References

1. Souillard, R., *et al* (2024). Biosecurity implementation on large-scale poultry farms in Europe: Aqualitative interview study with farmers. *Preventive Veterinary Medicine*, 224.
2. OIE Terrestrial Animal Health Code (2021).
3. Ncho, C. M., *et al* (2024). Abiotic stressors in poultry production: A comprehensive review. *J Anim Physiology Nutr.*, 2024, 1-21.
4. McMullin, P. (2022). Infectious diseases in free-range compared to conventional poultry production. *Avian. Pathology*, 51(5), 424-434.
5. Campo, J. L., (2004). Effects of specific noise and music stimuli on stress and fear levels of laying hens of several breeds. *Appl. Anim. Behav. Sci.*, 91, 75-84.
6. England, A., & Ruhnke, I. (2020). The influence of light of different wavelengths on laying hen production and egg quality. *World Poult. Sci. J.*, 76(3), 443–458.



Yours sincerely,

Obed M Lukhele (S18/00443) BVSc (Hons), MMedVet (Altil)

ASTRAL OPERATIONS LIMITED (Reg. No. 1947/027453/06)

Executive Committee: CE Schutte (Chairman) GD Arnold JAI Ferreira G Jordaan OM Lukhele N Moodley E Potgieter G Pretorius
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Directors: CE Schutte (CEO) GD Arnold JAI Ferreira OM Lukhele N Moodley E Potgieter

Company Secretary: L Marupen

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The Head of Department
Department of Environmental Affairs & Development Planning
Western Cape Government
8th Floor, Room 8-07
1 Dorp Street
Cape Town

J Brand/0532612 our ref
6 August 2025 your ref
date

URGENT / BY HAND

Dear Sir/Madam

RE: PROPOSED EXPANSION OF CAPE WINELANDS AIRPORT : DEA&DP REF 16/3/3/2/A5/20/2046/24

We act for Astral Operations Limited through its County Fair Division and have been mandated by it to address this letter directly to you even though the formal public participation for the proposed project, has closed. The reason for our addressing this letter directly to you will become apparent from what we set out below. We were notified on 16 July 2025 that the finalised EIA had been submitted to your Department for decision.

Our client is a registered interested and affected party in respect of the above project being a directly adjacent neighbour to the proposed project. Our client has, through ourselves, engaged fully in the public participation process but for reasons which will become apparent, needs to draw your attention to certain aspects which, although pertinently raised by us on our client's behalf when commenting on the amended EIA report, have either not been adequately responded to by the EAP in the case of certain of our client's concerns for its laying stock on its laying complex, or have been glossed over by both the EAP and the applicant's poultry specialist.

Offending paragraph in the comments and responses report (appendix 29C) to the documents submitted

On page 103 of 629 in appendix 29D being the comments and responses report on the amended EIA report, you will observe that we pertinently raised the paragraph reflected in bold at the top of page 246 of 416 of appendix 29C. We stated that the meetings and engagement between our client and the applicant were off-the-record to enable the parties to speak freely and the nature of the discussions ought not to have been reflected in appendix 29C. As stated by us on page 103 of 629 of appendix 29D, the statement in bold at the top of page 246 of 416 of appendix 29C conveys the incorrect message to the competent authority and should not have been included at all.

The response from the applicant which is also reflected on page 103 of 629 indicates that what was included in appendix 29C *“was an accurate reflection of the process and progress made at the time, this without disclosing confidential or sensitive information”*. The EAPs response on the same page is to the effect that off-record minutes of engagements between the parties are not included in the C&R but *“merely the summary of engagements and that is ongoing. This documentation is already in the public domain so removing it serves no purpose”*.

In appendix 40A, the engagements between the applicant and our client are set out in paragraph 5.2 on page 16. It will be observed that what is reflected there amounts to merely reflecting the dates and type of engagement but no detail whatsoever is reflected. Because the detail of the engagement was at all times confidential, the details thereof as reflected on the top of page 246 of 416 of appendix 29C ought never to have been reflected in a public document. In any event, what is reflected in that bold paragraph is (a) not a response to any comment made by us on our client’s behalf and (b), to the knowledge of the applicant, their engagement has ceased with no outcome and certainly not the outcome reflected in that bold paragraph.

Accordingly, our client informs the competent authority that there is no consensus in principle reached between it and the applicant and furthermore, that it remains a strenuous objector to the proposed project on all the grounds raised by it in its various comments at every stage of the EIA process.

Responses attributed to the applicant’s poultry specialist in appendix 29D

1. On page 107 of 629, a reference is made to the HPAI outbreak experienced on our client’s complex. This incident occurred in 2017 and made up, according to Astral’s Technical Executive : Agriculture, Dr Obed Lukhele, only about 6% of the HPAI cases in Astral during that year. This was an isolated occurrence which, due to our client’s stringent biosecurity controls, which include the draining of all water bodies to prevent the attraction of wild birds, our client’s complex has not suffered a recurrence. For the applicant’s specialist to rely on an occurrence which occurred some 8 years ago for the possible recurrence on our client’s complex, is simply unsubstantiated. However, the development of the land side facilities in very close proximity to our client’s chicken houses, constitute a potential source of its biosecurity being breached with HPAI being one of the potential consequences.
2. On page 108 of 629, the applicant’s specialist responds by referring to an increase in vehicular traffic and to the fact that the complex lies some 600 m from a township. The concern which was raised on our client’s behalf in its comments was not limited to vehicular traffic passing so near to its chicken houses, but rather the substantial increase in human activity related to the proposed land side activities in close proximity to our client’s chicken houses. Dr Lukhele comments that both vehicle and human traffic are biosecurity risks. People walking past the farm cannot introduce the pathogens (viruses, bacteria, etc) into the farm. The biosecurity risks associated with the main road and the informal human settlement have been successfully mitigated through various management/operational and physical pillars of biosecurity. This, says Dr Lukhele, is in line with the biosecurity fold-reduction of disease risk.

3. On page 125 of 629 of appendix 29D, when dealing with the concept of the poultry becoming habituated to the noise impulses from the airport, the applicant's specialist refers to a study dealing with the behavioural traits in broiler chicks. She appears to lose sight of the fact that our client's complex is a laying farm with mature hens and roosters and not young broilers. She makes the statement on page 127 of 629 that *"it should be noted that since the flocks will be exposed initially during rear, habituation should be completed before the onset of lay."* This comment on her part would not apply to our client's laying complex which may have birds of varying ages and cycles in the component farms at any one point in time and the more mature layers will certainly be negatively impacted by the lack of so-called "habituation" to the noise impulses. As Dr Lukhele points out, the birds on the complex will be in a production/laying stage. There is no rearing of flocks on our client's complex. Dr Lukhele points out, however, that it is worth realising that "habituation" to noise or any stress factor is not standard practice and cannot be accepted as the norm. Any form of stress must be avoided as it compromises bird health and welfare.

Conclusion

Because of the inability to respond to these aspects in appendix 29D due to the public participation period having closed, we felt constrained to address this letter directly to yourselves in order to ensure that these important aspects are drawn the decisionmaker's attention and to obviate a simple acceptance of the responses set out in appendix 29D, without more.

Kindly confirm receipt hereof by signing and stamping the copy hereof delivered to you simultaneously herewith, and to the extent that you may require clarification on any aspect contained herein, please do not hesitate to contact us.

Yours faithfully

EDWARD NATHAN SONNENBERGS INC.



Per: **James Brand**

APPEAL 3

**APPELLANT: RICHARD SUMMERS INC ON BEHLAF OF MORNINGSTAR FLYERS
ASSOCIATION NPC**

DATE RECEIVED:
19 NOVEMBER 2025



APPEAL FORM

In terms of the National Appeal Regulations

April 2019

Form Number: 2019

Note that:

1. This appeal must be submitted within **20 days** of being notified of the decision.
 2. This form is current as of **April 2019**. It is the responsibility of the Appellant to ascertain whether subsequent versions of the form have been released by the Appeal Administrator.
 3. This form must be used for appeals submitted in terms of National Appeal Regulations, 2014 in so far as it relates to decisions in terms of the:
 - a. Environment Conservation Act, 1989 (Act No. 73 of 1989);
 - b. National Environmental Management Act, 1998 (Act No. 107 of 1998);
 - c. National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004);
 - d. National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004);
 - e. National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008); and subordinate legislation made in terms of these laws.
 4. The required information must be inserted within the spaces provided in the form. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. The spaces may be expanded where necessary.
 5. Unless protected by law, all information contained in, and attached to this application, will become public information on receipt by the Department.
 6. A digital copy of this form may be obtained from the Department's website at <http://www.capegateway.gov.za/dept/eadp>.
 7. Please consult the National Appeal Regulations (dated 8 December 2014) and the Department's Circular EADP 0028/2014 on the "One Environmental Management System" and the EIA Regulations (dated 9 December 2014), and any other relevant regulations.
-

A. DECISION BEING APPEALED

1. Reference Number of the Decision being appealed:

_____16/3/3/2/A5/20/2046/24_____

2. Type of Decision being appealed (please circle the appropriate option):

Environmental Authorisation	24G Administrative Fine	Amendment of Environmental Authorisation	Amendment of Environmental Management Programme	Waste Management Licence	Atmospheric Emission Licence	Exemption Notice
Permit in terms of NEM: BA	Administrative Notice/ Directive	ECA: OSCA Permit	Other			

3. Brief Description of the Decision:

_____Environmental Authorisation for the Cape Winelands Airport development_____

4. Date of the decision being appealed (i.e. date on which the decision was made):

_____17 October 2025_____

B. APPELLANT'S INFORMATION

5. Please circle the appropriate option

Applicant	State Department / Organ of State	Interested and Affected Party

6. Appellant's information:

Name: Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025

Address:

Tel: _____ Cell: _____

Fax: _____ Email: _____

C. APPEAL INFORMATION

7. Did you lodge an Appeal submission within 20 days of the notification of the decision being sent to you?

Yes / **No** (Circle the appropriate response). If "Yes", attach a copy herewith.

8. The following documents must accompany the appeal submission, kindly indicate if they have been attached to the submission:

- 8.1 a statement setting out the grounds of appeal?;

Yes / **No** (Circle the appropriate response)

- 8.2 supporting documentation which is referred to in the appeal submission?;

Yes / **No** (Circle the appropriate response)

- 8.3 a statement, including supporting documentation, by the appellant that a copy of the appeal was submitted to the applicant, any registered interested and affected party and any organ of state with interest in the matter within 20 days from:

- 8.3.1 the date that the notification of the decision was sent to the registered interested and affected parties by the applicant.

Yes / **No** (Circle the appropriate response).

Please indicate the date on which a copy of the Notice of the decision was sent. 30 October 2025

OR

- 8.3.2 the date that the notification of the decision was sent to the applicant by the competent authority, issuing authority or licensing authority.

Yes / **No** (Circle the appropriate response).

Please indicate the date on which a copy of the Notice of the decision was sent. N/A

D. GROUNDS OF APPEAL

9. Set out the ground/s of your appeal: Clearly list your appeal issues and provide an explanation of why you list each issue.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025_____

- 9.1 Is your appeal based on factors associated with the process that was followed by the applicant/Environmental Assessment Practitioner/Competent Authority in reaching the decision?

Yes / **No** (Circle the appropriate response). Please provide details.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025_____

- 9.2 Is your appeal based on factors associated with matters of unacceptable environmental impacts/extenuating circumstances not taken into account by the Competent Authority?

Yes / **No** (Circle the appropriate response). Please provide details.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025_____

9.3 Have your appeal issues been raised previously in the public participation process?

Yes / **No** (Circle the appropriate response). Please provide details.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025 _____

9.4 Are you fundamentally opposed to the decision (e.g. to any development activity on the site)?

Yes / **No** / **Not applicable** (Circle the appropriate response). Please provide details.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025 _____

9.5 Are you in favour of the decision if your concerns can be remedied by rectifying the process or by mitigating or eliminating an impact/s of the activity/ies?

Yes / **No** / **Not applicable** (Circle the appropriate response). Please provide details.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025 _____

9.6 Please indicate what measures you propose to have your concerns remedied.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025 _____

9.7 Does your appeal contain any new information that was not submitted to the Environmental Assessment Practitioner (EAP) / or registered I&APs/ or the competent authority prior to the decision?

Yes / **No** (Circle the appropriate response). If the answer above is "Yes" please explain what this information is and why it should be considered by the Appeal Authority and why it was not made available to the EAP/ or I&AP/ or the competent authority prior to the decision. (Please ensure that the new information is attached hereto.)

E. SUBMISSION ADDRESS

This appeal must be submitted to the Appeal Administrator at the address listed below within 20 days of being notified of the decision:

By post: Attention: Marius Venter
Western Cape Ministry of Local Government, Environmental Affairs &
Development Planning
Private Bag X9186, Cape Town, 8000; or

By facsimile: (021) 483 4174; or

By hand: Attention: Mr Marius Venter (Tel: 021-483 3721)
Room 809, 8th floor Utilitas Building
1 Dorp Street, Cape Town, 8000; or

By e-mail: DEADP.Appeals@westerncape.gov.za

Note: You are also requested to submit an electronic copy (Microsoft Word format) of the appeal and any supporting documents to the Appeal Administrator.



Appellant's signature

19 November 2025
Date



RICHARD SUMMERS INC.
ATTORNEYS

Western Cape Department of Environmental Affairs and
Development Planning
Environmental Planning and Appeals Coordinator
Attention: Mr. Marius Venter

Our ref.: RWS/RNR21-002
DEADP ref.: 16/3/3/2/A5/20/2046/24

Per email: DEADP.Appeals@westerncape.gov.za

19 November 2025

Dear Sir/Madam

RE: APPEAL IN TERMS OF SECTION 43 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT 107 OF 1998 AGAINST THE GRANTING OF AN ENVIRONMENTAL AUTHORISATION 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

[DEADP Reference: 16/3/3/2/A5/20/2046/24]

INTRODUCTION

1. We act for Morningstar Flyers Association NPC (Registration No. 2014/267363/08) (the **Appellant**).
2. This appeal statement contains the appeal by the Appellant against the decision by the Western Cape Department of Environmental Affairs and Development Planning (**DEADP**) dated 17 October 2025 to grant environmental authorisation for the proposed expansion of the Cape Winelands Airport under DEADP reference number 16/3/3/2/A5/20/2046/24 (**EA**). The EA is attached hereto as Annexure A. The Appellant was notified of the granting of the EA on 30 October 2025. Proof of notification is attached hereto as Annexure B.
3. This appeal is submitted in terms of section 43(1) of the National Environmental management Act 107 of 1998 (**NEMA**) and is in compliance with the National Appeal Regulations, 2025, published under NEMA, as amended, within 20 days of the date on which the Appellant was notified of the decision. A copy of the appeal is submitted to Capewinlands Aero (Pty) Ltd (c/o

Unit 126, Victoria Junction
57 Prestwich Street
De Waterkant, 8001
Cape Town

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E: richard@summersinc.co.za

Morningstar Flying Club / Cape Winelands Airport / NEMA Appeal

Mr. Deon Cloete) (**Applicant**) on the same day that it is submitted to the Appeal Authority in accordance with regulation 4(2) of the National Appeal Regulations, 2025. Proof of notification to the Applicant is attached hereto as Annexure C.

4. In summary, the grounds of appeal are as follows:
 - 4.1. Ground 1: There is inadequate assessment of safety impacts of the flight activities from CWA on surrounding commercial and recreational aviation activities that make use of the uncontrolled airspace currently in existence for the purpose of, among others, flight training and fire and rescue operations.
 - 4.2. Ground 2: There is an inadequate assessment of socio-economic impacts of the CWA on surrounding commercial and recreational aviation operations.
 - 4.3. Ground 3: The Public Participation Process is defective and non-inclusive as it excluded key aviation authorities and stakeholders and withheld essential information.
 - 4.4. Ground 4: There is an absence of adequate conditions of authorisation that mitigate the impact of the CWA on existing aviation activities.

BACKGROUND TO MORNIGNSTAR AIRFIELD

5. The following section is provided by way of background to Morningstar Airfield:
 - 5.1. Morningstar Airfield was founded in 1986 and is a registered airfield located to the north of Cape Town along the West Coast. The airfield is used for recreational, training as well as fire and rescue aviation operations by an excess of 600 members.
 - 5.2. Morningstar Airfield accommodates two active training schools, with a collective student body of approximately 250 students. Morningstar Airfield also accommodates 94 hangars housing in excess of 230 light aircraft.
 - 5.3. A recent creation of a separate radio frequency to cover the 5nm radius of the Morningstar Airfield was instituted to avoid the Airfield's volume of radio traffic crowding out the regional general Traffic Information Broadcast frequency.
 - 5.4. The aircraft at Morningstar Airfield comprise of experimental and kit-form types, through the greater volume of moderate sized tourer and training type aircraft, to the high performance, cutting-edge developments, for which the very existence of non-type certified aircraft has been the rebirth of aviation development. Aircraft utilising this collective airspace have widely differing speeds ranging between 70 knots to 180 knots or more.
 - 5.5. Piloting these aircraft include many pilots licenced to fly in VFR conditions only, as with solo students and freshly licenced PPL pilots, most of which are flying basic training aircraft with

Morningstar Flying Club / Cape Winelands Airport / NEMA Appeal

- only the required limited onboard navigation facilities. At the other end of the spectrum, are high-tech flying machines, fitted with industry leading technology, capable of flying in almost all conditions.
- 5.6. Much of the flying activities involve local flights, for building flying hours for the local pilots; local flights to nearby airfields; community fun flights; but also GA traffic leaving Morningstar to fly to or from distant airports.
 - 5.7. The 12 – 14 school registered aircraft dominate the airspace. Not only school aircraft, but also a constant stream of private and commercial pilots who attend either of the schools at Morningstar Airfield for their licence revalidations and upgrades, in their own aircraft.
 - 5.8. Aircraft transiting through the airspace utilise the Morningstar Airfield's Fuel Bay, where there is a reliable source of aviation-specific fuel supply.
 - 5.9. The AMO at Morningstar, Sideslip Aviation Worx, sees a steady traffic of aircraft from airfields in the greater Province flying in for repairs, servicing or overhaul.
 - 5.10. Those forming part of the Morningstar flying community attend recognised Fly-In events around the Western province on the weekends, with 90 aircraft attending the annual Robertson Fly-In, for example.
6. It is clear from the above that the Morningstar Airfield accommodates extensive general aviation (**GA**) activity, affirming the inclusion of the airfield as part of one of the City of Cape Town's strategic intents as part of the Municipal Spatial Development Framework dated 26 January 2023 which is to *"Maintain a network of airfields used for civil aviation purposes, such as Morningstar"*.¹

BACKGROUND TO THE PROCESS LEADING UP TO THE EA

7. From 24 July 2024 up to and inclusive of 26 August 2024, an In-Process Scoping Report was circulated for public comment regarding the proposed expansion of Cape Winelands Airport (**CWA**). As early as the scoping phase, the Appellant's Morningstar Airfield was identified by I&APs as a key aerodrome in the study area, necessitating the inclusion of the Morningstar Airfield into the Concept of Operations (**CONOPS**) Report for the project as part of the Draft Environmental Impact Assessment Report (**Draft EIAR**) for the CWA. In other words, the Morningstar Airfield was not identified as a key aerodrome as part of the scoping phase for the project and was only included from the Draft EIAR onwards because I&APs questioned the lack of inclusion of the airfield in the scoping phase for the CWA. This is despite the Morningstar Airfield having been in existence for over 5 decades, with a national and international popularity as a commercial and recreational airfield.

¹ Page 141 of the City of Cape Town Municipal Spatial Development Framework, 2023.

Morningstar Flying Club / Cape Winelands Airport / NEMA Appeal

8. Concerns with reference to the Morningstar Airfield raised during the scoping phase include:
- 8.1. *“The airspace will compromise recreational aviation, a simple flight from Morningstar to FASH [Stellenbosch Airfield] will become problematic”*. The Environmental Assessment Practitioner (EAP) for the project insufficiently responded with *“Morningstar Airfield and Stellenbosch Airfield are registered IAPs for the proposed project”*.²
- 8.2. The Appellant stated that *“Our concerns related primarily to the potential changes to airspaces and the impact it may have on our free and safe use of the airspaces”*.³
9. On 12 November 2024, the Draft EIAR was circulated for public comment until 13 December 2024. At this stage, the Morningstar Airfield was included as part of the Concept of Operations (CONOPS) report attached to the Draft EIAR as Appendix 19, and in terms of which the operations at Morningstar Airfield were acknowledged as being substantial in nature.
10. The concerns raised by Morningstar during the public participation process for the Draft EIAR (c/o the-then Chairman of the Appellant and senior pilot, Timothy Irvine) include:
- 10.1. *“Morningstar Airport is almost completely left out of this report [Draft EIAR] even though they are as large as FASH [Stellenbosch Airfield] operations wise and a destination for rotax⁴ maintenance”*.⁵
- 10.2. *“Morningstar has not been identified as a place of significant GA activity, which it is. It is classified in the general classification of ‘minor airfields’ and in the context, this is not factually correct. It is highly likely to be the busiest GA airfield within the identified radius”*.⁶
- 10.3. The failure to address the safety issues and risk of VFR traffic in the area pertaining to training flights by inexperienced pilots⁷:
- 10.3.1. *“By increasing controlled airspaces with admittedly non professional and student pilots operating in the immediate area, a hazard is being created. This is a significant safety concern which is not addressed”*;
- 10.3.2. *“The approach of the report [Draft EIAR] to the creation of new controlled airspaces appears to be that the IFR routing are being established first and only then VFR traffic routes “may” be considered”*;
- 10.3.3. *“To be truly safe and duly considered it is our contention that VFR routes need to be fully*

² Page 131 and 132 of the Comment and Response Report attached as Appendix 30B to the Draft EIAR.

³ Page 203 of the Comment and Response Report attached as Appendix 30B to the Draft EIAR.

⁴ Rotax maintenance is a specialized protocol for aircraft engines and involves detailed procedures like a 100-hour inspection that includes a thorough visual check of the engine, airframe and systems, along with checks for wear and debris. This maintenance requires specific parts and must be performed by trained technicians.

⁵ Page 80 of the Comment and Response Report attached as Appendix 29B to the revised Draft EIAR.

⁶ Page 84 of the Comment and Response Report attached as Appendix 29B to the revised Draft EIAR.

⁷ Page 85 of the Comment and Response Report attached as Appendix 29B to the revised Draft EIAR.

considered at the same time as the IFR routes. The GA traffic is present, is material and needs to be fully identified and considered at inception”; and

- 10.3.4. *“In the absence of due consideration having being given by the report we remain concerned that around the edges of controlled airspace and on VFR passages, if indeed created, they may be narrow and constricted and create congestion points with non - sophisticated aircraft, with the bare minimum of instrumentation, piloted by non-professional pilots and student pilots”.⁸*
11. On 18 March 2025, a revised draft of the EIAR was made available for public comment. The concerns raised by the Appellant during the Draft EIAR public participation process were not adequately addressed in the revised Draft EIAR.
12. On 11 July 2025, the Final EIAR, Environmental Management Programme and supporting documentation was provided to DEADP to decide whether or not to grant an environmental authorisation in terms of section 24 of NEMA.
13. On 27 October 2025, the EA was granted to the Applicant for the development of the CWA.
14. The reasons for the decision, attached as Annexure 4 to the EA, does not provide any confirmation that the safety and socio-economic impacts of the CWA on Morningstar Airfield were considered as part of the decision to grant the EA. The consideration of the impacts is instead unlawfully deferred to a later stage in which a detailed airspace design is developed for the CWA as evident in the statement in the EA that “...the surrounding civil aviation sites and small aerodromes were identified. This information will be incorporated into the detailed airspace design of the expanded CWA to determine the measures required to ensure safe, efficient, and harmonious air traffic management. These considerations will be applicable when the airspace of the expanded CWA becomes available”.

GROUNDS OF APPEAL

Ground 1: Inadequate assessment of safety impacts in the context of the impacted airspace and surrounding aviation activities

15. This ground of appeal demonstrates that the impact of new CWA on adjoining and adjacent airfield traffic is unresolved and unaddressed which results in the inescapable conclusion that a vast consideration of safety-related impacts similarly remain unresolved and unaddressed.
16. DEADP’s deferral of a detailed consideration and assessment of information with respect to airspace design of the CWA in light of the surrounding civil aviation sites and small aerodromes, and specifically the Morningstar Airfield, to a later stage in which a detailed airspace design is established is indefensible because this means that critical information regarding safe, efficient and harmonious air traffic movement was not before the decision-maker prior to the EA being

⁸ Page 53 of the EA.

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granted, and the EA could similarly not provide for mitigation measures that serve the purpose of managing any of these unacceptable impacts.

17. This approach to environmental impact assessment where there are gaps in outstanding information, and the EA being granted on this basis, does not meet the threshold set out in section 2(4)(i) of NEMA which requires that *“the social, economic and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed and evaluated, and decisions must be appropriate in light of such consideration and assessment”*.
18. In support of this ground of appeal we submit the following:
 - 18.1. On DEADP’s own version, the information on surrounding civil aviation sites and small aerodromes is required to *“to ensure the safe, efficient, and harmonious air traffic management”*⁹. Safe, efficient and harmonious air traffic management, particularly in light of surrounding civil aviation sites such as the Morningstar Airfield, forms integral components to the determination of social, environmental and economic impacts of the CWA. Without a complete evaluation and assessment of these social, environmental and economic impacts, it is impossible to then propose mitigation measures that are adequately able to manage these impacts to ensure that there is safe, efficient and harmonious air traffic management.
 - 18.2. Without this information DEADP cannot attest to the safety and efficiency of air traffic movement of the CWA in light of the surrounding civil aviation sites and small aerodromes such as the Morningstar Airfield. This establishes a significant gap in information, particularly with respect to social, environmental and economic impacts, on which it is not possible to render a rational, reasonable and informed decision on the application for environmental authorisation submitted by the Applicant. This entirely subverts the impact mitigation hierarchy.
 - 18.3. In terms of the Guideline for Involving Social Assessment Specialists in EIA Processes, *“The purpose of an Environmental Impact Assessment is to provide decision-makers... with adequate and appropriate information about the potential positive and negative impacts of a proposed development and associated management actions in order to make an informed decision regarding whether or not to approve, proceed with or finance the development”*.¹⁰ The safety and efficiency of air traffic movement is a critical pre-requisite to any assessment and evaluation of the social, economic and environmental impacts of the CWA, which information has been deferred to a later stage by DEADP in the context of the EA. It is therefore inappropriate for DEADP to render a decision on this basis.
 - 18.4. We submit that the EA cannot satisfy the principles in section 2 of NEMA and the Environmental Impact Assessment Regulations, 2014 as amended, (**EIA Regulations**) if core

⁹ Annexure 4 to the EA.

¹⁰ Page 5 of the Guideline for Involving Social Assessment Specialists in EIA Processes prepared for DEADP dated February 2007.

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social, economic and environmental impacts are not identified, assessed and considered as part of the application submitted by the Applicant. The circumstances constitute a deferral of the impact mitigation hierarchy, without any valid excuse for the assessment of the social, economic and environmental impacts associated with an airspace design being deferred to a later stage, especially in light of I&APs having raised these concerns throughout the environmental impact assessment process. For example, as part of the Appellants comments on the Draft EIAR, the following safety concerns and identification of risks were raised:

- 18.4.1. *“By not knowing the size of the GA community and traffic it cannot address the issue as no appropriate risk assessment can be made and valid, safe conclusions reached”¹¹; and*
- 18.4.2. *“By increasing controlled airspaces with admittedly non professional and student pilots operating in the immediate area, a hazard is being create. This is a significant safety concern that is not being addressed” (own emphasis)¹².*
- 18.5. Sections 24(1) and 24O(1)(b)(i) of NEMA requires all relevant factors and impacts to be evaluated, considered and assessed by the competent authority prior to any authorisation in terms of section 24 of NEMA being granted. The above gaps in information create the necessary inference that this threshold has, in fact, been circumvented by the EA. As such, the EA issued contemplated a post-approval assessment of project impacts in a manner that falls foul of what is required of NEMA and the Environmental Impact Assessment Regulations, 2014, and which project impacts directly relate to human safety and livelihoods.

Ground 2: Inadequate assessment of socio-economic impacts in the context of the impacted airspace and surrounding aviation activities

19. The EA was issued without any detailed or final airspace design for accommodating CWA operations. The establishment of a new controlled airspace to accommodate operations at the proposed CWA would require converting large portions of the existing Cape Town Special Rules East and FAD69 areas. These areas are currently uncontrolled and used extensively for GA, flight training, microlight and recreational operations, as well as for access to multiple nearby airfields. In other words, this uncontrolled airspace currently provides significant socio-economic benefit to the various commercial and recreational operations of those airfields that make use of the airspace as it currently stands, including the Morningstar Airfield.
20. The conversion of major portions of the currently uncontrolled airspace into a controlled airspace volume reserved exclusively for CWA is no minor procedural adjustment, but rather represents one of the largest losses of uncontrolled Class G airspace in decades within the Western Cape and will have significant, irreversible consequences for general aviation, recreational flying and especially ab-initio and advanced commercial pilot training.

¹¹ Page 85 of the Comment and Response Report attached as Appendix 29B to the revised Draft EIAR.

¹² Page 85 of the Comment and Response Report attached as Appendix 29B to the revised Draft EIAR.

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21. In light of the above, the proposed CWA will give rise to and/or cause the following impacts which significantly undermine and risk the socio-economic sustainability of operations at the Morningstar Airfield:
- 21.1. Sever direct VFR access between the Morningstar Airfield and all points East including Stellenbosch Airfield (**FASH**) as the only licensed night-training GA field in the region, as well as airfields in Worcester and Overberg, among others.
- 21.2. Force detours north around Paardeberg which add 15-25 minutes and approximately 50km to every training flight. This not only comes at a significant monetary cost, but also an environmental cost of having to burn 15-25 minutes of extra fuel.
- 21.3. Severely compress the remaining Class G “slot” below the Cape Town TMA (which is currently only 500-2000 ft AGL in certain places). In this regard we note that it is likely that 80-90% of the Cape Town East Special Rules will be converted to controlled airspace for the CWA, and the remaining 10-20% thereof would likely be too small to retain for practical purposes. A considerable section of the southern part of the FAD96A will most likely also be converted.
- 21.4. Make the vast majority of commercial pilot training operating from Morningstar Airfield impossible or economically unviable without guaranteed, clearly defined VFR corridors.
22. The impacts of the CWA’s conversion to controlled airspace and the resultant loss of this critical uncontrolled airspace which will have a direct and cumulative social, economic and environmental impacts on the Morningstar Airfield, and which impacts have not been identified, evaluated and assessed as part of the environmental impact assessment process underpinning the EA. This is despite concerns of this nature having been raised throughout the public participation process. For example, Timothy Irvine, the previous chairman of the Morningstar Flying Club and senior pilot that is still very active at the club stated:
- 22.1. *“We are concerned that the report does not sufficiently detail the significant amount of GA activity that operates within the affected area, and much of it is from Morningstar. With no accurate assessment of the GA activity no valid and safe assessment can be made of the impact of the proposed changes”*. In response, the EAP promised a *“thorough risk assessment of the GA activities and their interaction with the proposed controlled airspace”*.¹³
- 22.2. *“By increasing controlled airspaces with admittedly non-professional and student pilots operating in the immediate area, a hazard is being created. This is a significant safety concern which is not addressed”*. In response, the EAP agreed that *“VFR route should be carefully planned alongside Instrument Flight Rules routes to prevent congestion and safety”*.¹⁴
23. The related gaps and shortcomings of the assessment by the EAP and relevant specialists of the

¹³ Page 84 of the Comment and Response Report attached to the Draft EIAR as Appendix 30B.

¹⁴ Page 85 of the Comment and Response Report attached to the Draft EIAR as Appendix 30B.

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social, economic and environmental impacts of converting significant portions of uncontrolled airspace is demonstrated by the following:

- 23.1. The revised Draft EIAR and Final EIAR do not include a thorough risk assessment of GA activities, their interaction with the proposed controlled airspace, and the social, economic and environmental impacts as a direct result thereof. There is also no evidence of VFR corridors having been planned, and which have a direct impact on the socio-economic sustainability of the Morningstar Airfield.
- 23.2. The Airspace and Capacity Study by Straten Consulting Services Ltd, attached as Appendix 20 to the revised Draft EIAR, is dated 22 March 2024. Despite the EAP's indication that a "*VFR route should be carefully planned alongside Instrument Flight Rules routes*" and the promise that "*a thorough risk assessment of the GA activities and their interaction with the proposed controlled airspace*" would be undertaken, the Airspace and Capacity Study dated 22 March 2024 was republished when the revised Draft EIAR was published for public comment on 18 March 2025, instead of being updated to address the above concerns raised by Timothy Irvine of the Morningstar Flying Club which the EAP confirmed would be assessed and addressed.
- 23.3. In light of the above, the Airspace and Capacity Study completely fails to identify, consider and assess the impact of designing and implementing a controlled airspace for the CWA in the context of the significant GA activities in the immediate vicinity. The Airspace and Capacity Study confirms this failure by the explicitly limited scope of work that the study aims to address which is: "*the study has focus on the response from ACSA [Airports Company South Africa] regarding the airspaces impacts future FAWN [CWA] operations will have on operations at FACT [Cape Town International Airport]*".¹⁵
- 23.4. The impacts on connectivity between Morningstar, Stellenbosch, Grootfontein and Wintervogel airfields were ignored and the impact neither evaluated nor considered as part of the environmental impact assessment process and associated specialist studies.
- 23.5. The increased risk of airspace congestion and safety conflicts in adjacent areas was not assessed.
- 23.6. No mitigation measures or conditions are suggested or imposed to safeguard existing aviation activities, and the safety, social, economic and environmental impacts as a direct result thereof.
24. The economic, environmental and social impacts of the CWA that were not identified, considered, or assessed as part of the environmental impact assessment process include:
 - 24.1. According to the Appellant, made up of various senior pilots with decades of experience in the field, Cape Town is at risk of no longer being considered as one of the top three destinations

¹⁵ Page 10 of the Airspace and Capacity Study by Straten Consulting Services Ltd dated 22 March 2024.

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globally for overseas and up-country students wishing to complete PPL, CPL, ME and ATPL training rapidly due to the year-round VFR weather and uncongested training airspace.

- 24.2. A large portion of the approximate 250 active students at the Morningstar Airfield are foreign or from other provinces and therefore provide significant financial contribution to the local economy annually through accommodation, tourism and job creation when attending flight training at Morningstar Airfield. The sustainability of Morningstar Airfield's operations are at risk of irreparable harm with the intended conversion of uncontrolled airspace to accommodate the CWA, resulting in the risk of losing these students and their associated financial contribution to the local economy.
- 24.3. Any significant curtailment of training capacity at the Morningstar Airfield will force flight schools to relocate to the Eastern Cape, Kwa-Zulu Natal or even overseas resulting in direct, permanent job loss at existing airfields, flight schools etc and the loss of revenue that these operations generate for the local and regional economy in the Western Cape.
25. The potential impact of the proposed CWA project on other key aviation sites impacted by the project was not addressed in the environmental impact assessment process, resulting in various socio-economic impacts not being identified and placed before the decision-maker prior to deciding on whether or not to grant the EA:
- 25.1. Wintervogel Airfield situated in Malmesbury is a microlight and gyrocopter base, the use of which will effectively be sterilised by the proposed CWA for the majority of the current users who cannot afford transponders worth over R70 000.00 which will be a critical pre-requisite to their making use of a newly controlled airspace as a result of the CWA conversion. The majority of current users of Wintervogel Airfield situated in Malmesbury rely on the relatively low entry cost that weight-shift microlights represent, as this facility represents one of the few cost-effective facilities of this nature in the local area and region. The Wintervogel Airfield situated in Malmesbury lies directly within the existing FAD69 airspace, which would need to be converted into a newly controlled airspace to accommodate the proposed development of the CWA project. This would have an irreversible impact on the sustainability of existing operations at this airfield, which activities contribute directly to local skills development, recreational aviation and the small-scale aviation economy. However, none of these socio-economic aspects or impacts were considered in the environmental impact assessment process or, therefore, the competent authority as required in terms of NEMA and the EIA Regulations prior to granting the EA.
- 25.2. Grootfontein Airfield near Fisantekraal is a registered airfield whose based aircraft will potentially lose independent departure and arrival rights, thus crippling the operations of this airfield. This airfield is located in close proximity to where the runway for the CWA will be and falls within the Special Rules East airspace (i.e. uncontrolled airspace), relying on the Special Rules East to access this airfield. This was not considered as part of the environmental impact assessment process and associated specialist reports and, consequently, was not considered by the competent authority prior to granting the EA.

- 25.3. Rondebossie situated west of the Fisantekraal Airfield is the only remaining hang-gliding training site in the greater Cape Town area which stands to be significantly impacted by the CWA, effectively preventing the continued operation thereof. Any Letter of Agreement signed in this regard, without the contents of such being incorporated as a condition of authorisation in the EA, is mere window dressing.
26. In light of the above, we confirm the following:
- 26.1. Consequently, there is no quantitative assessment of the social and economic impacts of the CWA on the sustainability of surrounding aviation operations. Therefore, there is no objective basis upon which the competent authority is positioned to assess the sustainability of the CWA and to make an informed and rational decision on the need and desirability of the proposal. The assessment and determination of the sustainability, need and desirability of the CWA goes to the heart of the efficiency and effectiveness of the environmental impact assessment as a whole. If significant gaps remain outstanding, such as those identified in this appeal statement, the competent authority is unable to make an informed and rational decision on the sustainability, need and desirability of the CWA as required by the environmental impact assessment regime.
- 26.2. Evaluating the full cost-benefit analysis of the CWA project without an objective, independent and comprehensive assessment by an appropriately qualified expert of the social and economic impact of the CWA on aviation operations in the immediate vicinity is flawed, and any decision rendered on this basis is irrational and unreasonable.
- 26.3. The lack of a substantive, methodical and credible assessment of the socio-economic impacts of the CWA on surrounding aviation operations is a material deficiency. The Final EIAR and specialist assessments underpinning this should be rejected on the basis that the full range of socio-economic impacts of the CWA have not been identified, considered and assessed as part of the environmental impact assessment processes contrary to the prescripts of the following principles in section 2 of NEMA:
- 26.3.1. *“Environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitably”*.¹⁶
- 26.3.2. *“Development must be socially, environmentally and economically sustainable”*.¹⁷
- 26.3.3. *“Decisions must take into account the interest, needs and values of all interested and affected parties”*.¹⁸

¹⁶ Section 2(2) of NEMA.

¹⁷ Section 2(3) of NEMA.

¹⁸ Section 2(4)(g) of NEMA.

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- 26.3.4. *“The social, economic and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed and evaluated, and decisions must be appropriate in the light of such consideration and assessment”.*¹⁹
27. It is clear that there is no substantive, quantitative socio-economic impact assessment of the effects of the proposed project which reflects the full range of socio-economic consequences of the CWA. The full range of socio-economic impacts of the CWA is a critical pre-requisite to the enquiry as to the sustainability of the development in light of existing aviation operations. The Constitutional Court in *Fuel Retailers Association v Director General (Fuel Retailers)* case is prescriptive in this regard: *“...the objective of considering the impact of proposed development on existing ones is not to stamp out competition; it is to ensure the economic, social and environmental sustainability of all developments, both proposed and existing ones”.*²⁰ This threshold was not met in granting the EA.
28. The Constitutional Court in *Fuel Retailers* also entrenches the inextricable link between socio-economic considerations with environmental considerations: *“Economic sustainability is not treated as an independent factor to be evaluated as a discrete element in its own terms. Its significance for NEMA lies in the extent to which it is inter-related with environmental protection... The essence of sustainable development is balanced integration of socio-economic development and environmental priorities and norms”.*²¹
29. The failure to identify and assess the implications of the CWA project on the existing commercial and recreational operations at the Morningstar Airfield, as well as those at the Wintervogel and Grootfontein Airfields, its users, and related training and economic activities, demonstrates an inadequate impact assessment in terms of section 24 of NEMA and a disregard for sections 24(1) and 24O(1)(b)(i) of NEMA. Consequently, the decision to issue the EA was made without full knowledge of all potential material environmental and socio-economic impacts. By omitting a detailed assessment of how the CWA’s impact on the surrounding airspace will affect existing GA, flight training and recreational flying, the EA was issued without full knowledge of relevant factors, rendering it procedurally and substantively non-compliant the requirement that a decision-maker must be presented with the full range of socio-economic and environmental impacts in order to render a rational and reasonable decision.
30. In short, the environmental impact assessment underpinning the EA has failed its most fundamental objective, which is to provide sufficient information to enable informed and credible decision-making and that ALL potentially significant project impacts are identified and assessed before a decision is taken to approve the CWA project. This did not happen and the information the EA was based on is materially deficient. NEMA and the EIA Regulations do not include empowering provisions providing for the impacts and mitigation measure to be

¹⁹ Section 2(4)(i) of NEMA.

²⁰ *Fuel Retailers Association of Southern Africa v Director-General: Environmental Management, Department of Agriculture, Conservation and Environment, Mpumalanga Province and Others* 2007 6 SA 4 (CC) at para 78.

²¹ Para 113.

retrofitted to the approval after an EA is granted. The decision to issue the EA in these circumstances is irrational. It is fundamentally unlawful to ignore or defer the impact mitigation hierarchy.

Ground 3: Public Participation Process is defective, non-transparent and non-inclusive.

31. The failure to provide any detailed airspace designs intended to accommodate CWA operations, which areas are currently uncontrolled and used extensively for GA, flight training, microlight and recreational operations, means that the various commercial and recreational aviators that make use of this uncontrolled airspace have been prevented from meaningfully participating in the EIA process and associated public participation process underpinning the EA. These aviators include those forming the Stick and Throttle Aviation Morningstar Flight Academy flight schools, as well as Morningstar Flying Club members and all other aviators operating in the area.
32. This approach to impact assessment and public participation flies in the face of the following NEMA principles:
 - 32.1. Section 2(4)(f) of NEMA which requires all people taking part in public participation processes to have the opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation. The Appellant, and other I&APs, have been deprived an opportunity to understand the full extent of the impact of the CWA on the airspace currently in use, and the nature, degree and severity of such impacts is unknown. This is not cured by the proposition by the developer that an agreement can be reached at some point in the future which, if and when agreed to, cannot in any way form part of the current EA's conditions of authorisation.
 - 32.2. Section 2(4)(g) of NEMA which requires the EIA and the competent authority to have taken into account the interest, needs and values of the Appellant and similar operators, but this is not possible in the current circumstances as the Appellant has been unable to express their interests and/or understand the precise nature of such impacts with respect to a detailed airspace design study as this design has been deferred unlawfully and irrationally to the post-approval stage.
 - 32.3. Section 2(4)(k) of NEMA which requires that decisions by the CA must be made in a transparent manner and access to all materially relevant impact assessment information must be made available as a critical prerequisite to any meaningful public participation process. On these facts, the EA was granted irrationally on the basis that there were various gaps and material flaws in the assessment and information tabled in the final EIAR, particularly with respect to aviators safety and socio-economic impacts on the sustainability of the operations of existing airfields in the receiving environment, which is compounded by the fact that the Appellant, and others, are still unaware of the precise extent of which the CWA will impact their airspace operations.

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33. We identify the following further examples of the materially inadequate and defective approach to public participation in the circumstances:
- 33.1. The Airspace and Capacity Study records several substantive stakeholder concerns that were either dismissed without further specialist investigation or deferred to a separate process in terms of the ICAO Document 9992, undermining the transparency required for any decision made by the competent authority under section 24 of NEMA.
- 33.2. For example, ACSA raised that *“any change to airspace arrangements, as a result of CWA impacting traffic flows outside the CTIA CTR, will negatively impact the aviation industry”*.²² This concern was dismissed by Straten Consulting Services Ltd with the statement that *“no evidence is provided by ACSA to support this statement... examples of high-capacity airports elsewhere in the world indicate this statement has no basis”*²³, without conducting further investigations or commissioning a bespoke specialist study or engaging other aviation stakeholders to investigate the substance of the concerns raised.
- 33.3. Similarly, the Stellenbosch Flying Club expressed a *“concern on the proposed change to FAD69”*, to which the response by Straten Consulting Services Ltd in the Airspace and Capacity Study was that *“CWA has initiated a Task group to ensure engagement by all stakeholders... it is not unreasonable to expect a reasonable outcome”*.²⁴ No information is provided on who constitutes this task group, how its members were selected or how its decisions will inform the final design or how this deferral of materially relevant investigations will be subjected to public scrutiny after the EA has already been issued. In addition, when stakeholders such as the Stellenbosch Flying Club, the Appellant and ACSA requested *“clarity on VFR corridors”*, the response by Straten Consulting Services Ltd was that *“it would be premature to determine where VFR corridors can be defined... VFR transiting the airspace will be accommodated when possible”*.²⁵ This leaves open the possibility that such access could be denied which would irreparably damage the sustainability of aviation operations in the vicinity of the CWA. This impact has not been identified, considered and addressed.
34. These dismissive and indeterminate responses, combined with the refusal to provide critical information on VFR corridors and airspace designs associated with the CWA with the Appellant and other stakeholders in order for them to meaningfully participate in the preceding public participation processes, is legally indefensible and contrary to the principles of NEMA. This has entrenched the gaps in information placed before the competent authority, creating a basis on which a reasonable, rational and informed decision cannot be reached.
35. This approach to public participation, in which I&APs are provided a limited amount of information, expected to meaningfully participate, and expected to accept the loose verbal

²² Page 13 and 37 of Appendix 20 to the Revised Draft EIAR.

²³ Page 35 of Appendix 30 to the Revised Draft EIAR.

²⁴ Page 40 of Appendix 20 to the revised Draft EIAR.

²⁵ Page 41 of Appendix 20 to the revised Draft EIAR.

promise of a future agreement to accommodate all of their interests, is legally indefensible and cannot serve to inform rational and reasonable decision-making. This approach undermines the procedural integrity of the environmental impact assessment process underpinning the EA and infringes on the Appellants right to administrative justice enshrined in section 33 of the Constitution of the Republic of South Africa, 1996.

Ground 4: Absence of adequate conditions of authorisation that mitigate the impact on existing aviation operations

36. Derek Johan Lord of the Stellenbosch Flying Club and its Flight School deposed to an affidavit, attached hereto as Annexure D, in which he confirmed the following:

36.1. Mr. Lord participated in all task teams, technical workgroups and consultative processes convened as part of the environmental impact assessment process underpinning the EA that sought to:

36.1.1. Design the proposed controlled airspace;

36.1.2. Schedule IFR aircraft routing associated with the CWA; and

36.1.3. Plan air traffic management to mitigate impacts of proposed airspace proclamations on existing GA operations in the affected areas.

36.2. During the various engagements, significant concerns were raised by the GA community with respect to the adverse effects anticipated from the proposed airspace structures.

36.3. Over a period of almost two years, the Applicant facilitated numerous structured engagements where the concerns of the GA community were deliberated extensively.

36.4. These engagements resulted in several mutually acceptable mitigation measures, developed collaboratively and accepted, in-principle, by the Applicant and participating I&APs.

36.5. These mitigation measures addressed various key components:

36.5.1. Operational safety;

36.5.2. Equitable airspace access;

36.5.3. Routing deconfliction; and

36.5.4. The preservation of long-standing General Aviation corridors and training activities.

36.6. Despite the Applicant's acknowledgement of agreed measures, the EA does not incorporate these measures as conditions of environmental authorisation nor does it show any evidence of having considered these measures.

36.7. The omission of these agreed-on mitigation measures as conditions of authorisation constitutes a material deviation from the consultation record and directly impacts the rights, safety and operational viability of the GA community.

37. As confirmed above, the EA fails to impose binding mitigating conditions on the Applicant which serve to avoid, minimise or manage the significant impact of the CWA project on the existing aviation community and existing airfield operations identified in this Appeal. The specific omissions include:
- 37.1. There are no directly relevant conditions of approval or mitigation measures that seek to safeguard the continued sustainable operations of existing airfields or accessibility for the surrounding aviation community such as those at the Morningstar Airfield, the Grootfontein Airfield as well as the Wintervogel Airfield. Although the precise degree of impacts on these airfields is as-yet unknown, due to the Applicant's and EAP's failure to discharge the onus to provide detailed airspace designs and assessments for the CWA as part of the EIA process, it is certain that the move from an uncontrolled to a controlled airspace will have a devastating impact on those forming part of impacted airfields in the vicinity.
- 37.2. The EA fails to include the mitigation measures recommended in Appendix 20 of the Airspace and Capacity Study regarding a Letter of Agreement to protect the South African Hang Gliding and Paragliding Association hang-gliding site, the only training hill for hang-gliding near Cape Town.
38. Without the imposition of binding conditions on the Applicant and holder of the EA, all external agreements between the Applicant with the surrounding aviation community are mere window-dressing, with little to no recourse for those whose operations, activities and livelihoods are impacted negatively by the direct, indirect and cumulative impacts associated with the introduction of a large-scale new international airport in the form of the CWA project. Section 24O(1)(b)(ii) of NEMA mandates the competent authority to ensure that mitigation measures imposed as part of the EA are adequate. In the circumstances, however, this critically important aspect of mitigation with respect to the harmful socio-economic impacts of the CWA on aviation operations in the immediate vicinity have been ignored and deferred to a post-approval context. We submit that the threshold of adequacy cannot be met in these circumstances where the impact assessment and impact mitigation hierarchy have been deferred and, as such, adverse impacts of the CWA have not been avoided, minimised or remedied in contravention of section 2(4)(a)(viii) of NEMA.
39. Without binding conditions of authorisation that are bespoke to the project-related impacts and mitigation measures, existing aviation operations are at risk of being cut off from the airspace that these operations have made use of for decades, rendering these operations inoperable or forced to close, resulting in irreversible socio-economic harm and non-compliance with NEMA's sustainability and equity principles in section 2(4) of NEMA. In the circumstances, the economic, social and environmental sustainability of all developments, proposed and existing, have not been balanced in light of one another and in light of the impacts of the CWA on the environment. This promotes unsustainable development contrary to the tenets thereof outlined in section 24 of the Constitution, NEMA and by the Constitutional Court in *Fuel Retailers*.

CONCLUSION

40. For the reasons provided in this Appeal, the granting of this EA is fatally flawed and would not withstand judicial scrutiny.
41. The Appeal accordingly should be upheld and the decision to grant the EA set aside.

Richard Summers Inc.



Per RW Summers

EIA REFERENCE: 16/3/3/2/A5/20/2046/24
NEAS REFERENCE: WCP/EIA/0001497/2024
DATE OF ISSUE: 27 OCTOBER 2025

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Capewinlands Aero (Pty) Ltd.
P. O. Box 12449
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Dear Sir

APPLICATION FOR ENVIRONMENTAL AUTHORISATION 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): THE PROPOSED EXPANSION OF THE EXISTING 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. With reference to the above application, the Department hereby notifies you of the Competent Authority's decision to **grant** Environmental Authorisation, attached herewith, together with the reasons for the decision.
2. In terms of Regulation 4 of the EIA Regulations, 2014 (as amended), you are instructed to ensure, within fourteen (14) days of the date of the decision on the application, that all registered Interested and Affected Parties ("I&APs") are provided with access to the decision and reasons for the decision, and that all registered I&APs are notified of their right to appeal.
3. Your attention is drawn to Chapter 2 of the National Appeal Regulations, 2025 (as amended), which prescribes the appeal procedure to be followed. This procedure is summarised in the Environmental Authorisation below.

Your interest in the future of the environment is greatly appreciated.

Yours faithfully

Zaahir Toefy Digitally signed by Zaahir Toefy
Date: 2025.10.27 21:19:42
+02'00'

MR. ZAAHIR TOEFY
DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)
WESTERN CAPE GOVERNMENT: ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Copied to:

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EIA REFERENCE: 16/3/3/2/A5/20/2046/24

NEAS REFERENCE: WCP/EIA/0001497/2024

ENVIRONMENTAL AUTHORISATION

APPLICATION FOR ENVIRONMENTAL AUTHORISATION 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): 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

With reference to your application for the abovementioned, find below the outcome with respect to this application.

DECISION

By virtue of the powers conferred on it by the NEMA and the EIA Regulations, 2014 (as amended), the Competent Authority herewith **grants Environmental Authorisation** to the applicant to undertake the Listed Activities specified in Section B below with respect to Alternative 2, described in the final EIA Report (dated 1 July 2025).

In terms of the NEMA and the EIA Regulations, 2014 (as amended), the Competent Authority hereby **adopts the Maintenance Management Plan ("MMP")** submitted together with the final EIA Report.

The applicant for the application for Environmental Authorisation is required to comply with the Conditions set out in Section E below.

A. DETAILS OF THE HOLDER FOR THIS ENVIRONMENTAL AUTHORISATION

Capewinlands Aero (Pty) Ltd.

C/O Mr. Deon Cloete

P. O. Box 12449

MILL STREET

8001

Cell: 082 339 2807

E-mail: d.cloete@capewinlands.aero

The abovementioned applicant is the holder of this Environmental Authorisation and is hereinafter referred to as "**the holder**".

B. LISTED ACTIVITIES AUTHORISED

Listed Activity	Activity/Project Description
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 9 Activity Description: <i>"The development of infrastructure exceeding 1 000 metres in length for the bulk transportation of water or storm water—</i> <i>(i) with an internal diameter of 0,36 metres or more; or</i> <i>(ii) with a peak throughput of 120 litres per second or more;</i> <i>excluding where—</i> <i>(a) such infrastructure is for bulk transportation of water or storm water or storm water drainage inside a road reserve or railway line reserve; or</i> <i>(b) where such development will occur within an urban area."</i>	The development proposal includes the installation of stormwater infrastructure exceeding 1 000 metres in length with an internal diameter of more than 0,36 metres on a site located outside an Urban Area.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 10 Activity Description: <i>"The development and related operation of infrastructure exceeding 1 000 metres in length for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes –</i> <i>(i) with an internal diameter of 0,36 metres or more; or</i> <i>(ii) with a peak throughput of 120 litres per second or more;</i> <i>excluding where—</i> <i>(a) such infrastructure is for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes inside a road reserve or railway line reserve; or</i> <i>(b) where such development will occur within an urban area."</i>	The development proposal includes the installation of sewer- and non-potable water supply infrastructure exceeding 1 000 metres in length with an internal diameter of more than 0,36 metres on a site located outside an Urban Area.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 12 Activity Description: <i>"The development of—</i> <i>(i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or</i> <i>(ii) infrastructure or structures with a physical footprint of 100 square metres or more;</i> <i>where such development occurs—</i> <i>(a) within a watercourse;</i> <i>(b) in front of a development setback; or</i>	The development proposal includes the installation of infrastructure with a physical footprint that exceeds 100m² within 32m of a watercourse on a site located outside an Urban Area.

(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; — excluding— (aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies; (dd) where such development occurs within an urban area; (ee) where such development occurs within existing roads, road reserves or railway line reserves; or (ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared."	
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 13 Activity Description: <i>"The development of facilities or infrastructure for the off-stream storage of water, including dams and reservoirs, with a combined capacity of 50 000 cubic metres or more, unless such storage falls within the ambit of activity 16 in Listing Notice 2 of 2014."</i>	The development proposal includes the establishment of attenuation ponds for stormwater management with a combined capacity of 50 000 cubic metres or more.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 16 Activity Description: <i>"The development and related operation of facilities for the desalination of water with a design capacity to produce more than 100 cubic metres of treated water per day."</i>	The development proposal includes the development of a desalination facility for the treatment of more than 100m³ of groundwater per day.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 19 Activity Description: <i>"The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;</i> <i>but excluding where such infilling, depositing, dredging, excavation, removal or moving—</i> (a) will occur behind a development setback;	The development proposal includes the infilling or depositing, dredging, excavation, removing or moving of more than 10 cubic metres of material from- and/or into a watercourse and wetlands.

(b) is for maintenance purposes undertaken in accordance with a maintenance management plan; (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or (e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies."	
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 24 Activity Description: <i>"The development of a road—</i> (i) <i>for which an environmental authorisation was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010; or</i> (ii) <i>with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres;</i> <i>but excluding a road—</i> (a) <i>which is identified and included in activity 27 in Listing Notice 2 of 2014;</i> (b) <i>where the entire road falls within an urban area; or</i> (c) <i>which is 1 kilometre or shorter."</i>	The development proposal includes the establishment of several roads with a reserve wider than 13,5 meters, or where no reserve exists, where the roads are wider than 8 metres.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 25 Activity Description: <i>"The development and related operation of facilities or infrastructure for the treatment of effluent, wastewater or sewage with a daily throughput capacity of more than 2 000 cubic metres but less than 15 000 cubic metres."</i>	The development proposal includes the development of a sewage treatment facility with a daily throughput capacity of more than 2 000 cubic metres but less than 15 000 cubic metres.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 26 Activity Description: <i>"Residential, retail, recreational, tourism, commercial or institutional developments of 1 000 square metres or more, on land previously used for mining or heavy industrial purposes; —</i> <i>excluding —</i> (i) <i>where such land has been remediated in terms of part 8 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the National Environmental Management: Waste Act, 2008 applies; or</i> (ii) <i>where an environmental authorisation has been obtained for the decommissioning of such a mine</i>	The proposal includes the development of commercial, tourism and retail components that exceeds 1 000 square metres, on a site that was previously used for mining purposes.

or industry in terms of this Notice or any previous NEMA notice; or (iii) where a closure certificate has been issued in terms of section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) for such land."	
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 28 Activity Description: "Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes."	The proposed development includes the transformation of agricultural land that exceeds 5 hectares on a site located outside an Urban Area.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 48 Activity Description: "The expansion of— (i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or (ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more; where such expansion occurs— (a) within a watercourse; (b) in front of a development setback; or (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding— (aa) the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such expansion activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 23 in Listing Notice 3 of 2014, in which case that activity applies; (dd) where such expansion occurs within an urban area; or	The development proposal includes the expansion of infrastructure by more than 100m² within a watercourse and/or within 32m of a watercourse and wetlands.

(ee) where such expansion occurs within existing roads, road reserves or railway line reserves."	
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 56 Activity Description: <i>"The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre—</i> <i>(i) where the existing reserve is wider than 13,5 meters;</i> <i>or</i> <i>(ii) where no reserve exists, where the existing road is wider than 8 metres;</i> <i>excluding where widening or lengthening occur inside urban areas."</i>	The development proposal includes the widening of existing roads by more than 6 metres, where the reserve is wider than 13,5 meters on a site located outside an Urban Area.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 61 Activity Description: <i>"The expansion of airports where the development footprint will be increased."</i>	The development proposal includes the expansion of an existing airport, resulting in an increased development footprint.
Listing Notice 2 of the EIA Regulations, 2014 (as amended)– Activity Number: 1 Activity Description: <i>"The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more, excluding where such development of facilities or infrastructure is for photovoltaic installations and occurs —</i> <i>(a) within an urban area; or</i> <i>(b) on existing infrastructure."</i>	The development proposal includes the installation of infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more on a site that is located outside an Urban Area.
Listing Notice 2 of the EIA Regulations, 2014 (as amended)– Activity Number: 4 Activity Description: <i>"The development and related operation of facilities or infrastructure, for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of more than 500 cubic metres."</i>	The development proposal includes the storage of dangerous goods at various facilities on the site, with a combined capacity of more than 500 cubic metres.
Listing Notice 2 of the EIA Regulations, 2014 (as amended)– Activity Number: 7 Activity Description: <i>"The development and related operation of facilities or infrastructure for the bulk transportation of dangerous goods—</i> <i>(i) in gas form, outside an industrial complex, using pipelines, exceeding 1 000 metres in length, with</i>	The development proposal includes the installation of a feeder pipeline for the transfer of dangerous goods with a throughput of approximately 312m³/day and a length exceeding 1000 metres.

<i>a throughput capacity of more than 700 tons per day;</i> (ii) <i>in liquid form, outside an industrial complex, using pipelines, exceeding 1 000 metres in length, with a throughput capacity of more than 50 cubic metres per day; or</i> (iii) <i>in solid form, outside an industrial complex, using funiculars or conveyors with a throughput capacity of more than 50 tons per day."</i>	
Listing Notice 2 of the EIA Regulations, 2014 (as amended)– Activity Number: 15 Activity Description: <i>"The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for—</i> (i) <i>the undertaking of a linear activity; or</i> (ii) <i>maintenance purposes undertaken in accordance with a maintenance management plan."</i>	The development proposal includes the clearance of more than 20 hectares of indigenous vegetation.
Listing Notice 2 of the EIA Regulations, 2014 (as amended)– Activity Number: 27 Activity Description: <i>"The development of a road—</i> (i) <i>.....</i> (ii) <i>.....</i> (iii) <i>with a reserve wider than 30 metres; or</i> (iv) <i>catering for more than one lane of traffic in both directions;</i> <i>but excluding a road—</i> (a) <i>for which an environmental authorisation was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010, in which case activity 24 in Listing Notice 1 of 2014 applies;</i> (b) <i>which is 1 kilometre or shorter; or</i> (c) <i>where the entire road falls within an urban area."</i>	The proposal includes the development of roads catering for more than one lane of traffic in both directions.
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 1 Activity Description: <i>"The development of billboards exceeding 18 square metres in size outside urban areas, mining areas or industrial complexes.</i> i. <i>Western Cape</i> i. <i>All areas outside urban areas, mining areas or industrial complexes."</i>	The development proposal includes the installation of billboards exceeding 18 square metres in size on the site located outside an Urban Area.

Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 2 Activity Description: <i>"The development of reservoirs, excluding dams, with a capacity of more than 250 cubic metres.</i> i. Western Cape i. A protected area identified in terms of NEMPAA, excluding conservancies; ii. In areas containing indigenous vegetation; or iii. Inside urban areas: (aa) Areas zoned for use as public open space; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority, or zoned for a conservation purpose."	The development proposal includes the development of reservoirs with a total capacity of more than 250 cubic metres on a site that contains indigenous vegetation.
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 3 Activity Description: <i>"The development of masts or towers of any material or type used for telecommunication broadcasting or radio transmission purposes where the mast or tower—</i> (i) <i>is to be placed on a site not previously used for this purpose; and</i> (ii) <i>will exceed 15 metres in height—</i> <i>but excluding attachments to existing buildings and masts on rooftops.</i> i. Western Cape i. All areas outside urban areas; ii. Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority, or zoned for a conservation purpose, within urban areas; or iii. Areas zoned for use as public open space or equivalent zoning within urban areas."	The development proposal includes the development of towers exceeding 15 metres in height on a site located outside an Urban Area.
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 4 Activity Description: <i>"The development of a road wider than 4 metres with a reserve less than 13,5 metres.</i> i. Western Cape i. Areas zoned for use as public open space or equivalent zoning; ii. Areas outside urban areas; (aa) Areas containing indigenous vegetation; (bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or	The development proposal includes the establishment of roads wider than 4 metres with a reserve less than 13,5 metres on a site that contains indigenous vegetation located outside an Urban Area.

iii. Inside urban areas: (aa) Areas zoned for conservation use; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority."	
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 12 Activity Description: "The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. i. Western Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans; iii. Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas; iv. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or v. On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister."	The development proposal includes the clearance of more than 300m² of Critically Endangered indigenous vegetation.
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 18 Activity Description: "The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre. i. Western Cape i. Areas zoned for use as public open space or equivalent zoning; ii. All areas outside urban areas: (aa) Areas containing indigenous vegetation; (bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or iii. Inside urban areas: (aa) Areas zoned for conservation use; or	The development proposal includes the widening of roads by more than 4 metres on a site that contains indigenous vegetation located outside an Urban Area.

(bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority."	
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 19 Activity Description: <i>"The expansion of runways or aircraft landing strips where the expanded runways or aircraft landing strips will be longer than 1,4 kilometres in length.</i> i. Western Cape i. All areas outside urban areas."	The development proposal includes the expansion of the existing landing strip by more than 1,4 kilometres on a site located outside an Urban Area.

The abovementioned list is hereinafter referred to as **"the Listed Activities"**.

The holder is herein authorised to undertake the abovementioned Listed Activities for the below Alternative, which entails the expansion of the existing Cape Winelands Airport ("CWA"), comprising the development of five precincts, one of which will be the Agricultural Precinct. The remaining four precincts, *namely*; the Services Precinct, the Airside Precinct, the Terminal Precinct, and the General Aviation Precinct, will be developed in two distinct phases. After the implementation of Phase 1 stipulated below, Phase 2 will evolve in response to market demand.

Phase 1:

- An Agricultural Precinct, measuring approximately 462ha in extent, comprises the continuation of the existing agricultural component. This Precinct includes the construction of the following:
 - an existing main access roads and internal farm roads left unchanged;
 - areas of intact vegetation respected as 'no-go' areas for conservation;
 - establishment of the required firebreaks;
 - establishment of wetland rehabilitation;
 - establishment of designated wetland offset areas;
 - construction and installation of associated stormwater infrastructure; and
 - fence line on the outer perimeter and a shared security fence line with the Airside precinct.
- A Services Precinct, measuring approximately 65ha, which will include the construction of the following:
 - a maintenance repairs and operational hanger;
 - an aircraft sanitary station;
 - an airport maintenance facility/area;
 - a catering building;
 - a Ground Support Equipment ("GSE") staging and maintenance facility;
 - a Fuel farm;
 - a cargo terminal;
 - an Aircraft Rescue and Firefighting facility;
 - an Operations Centre ("OPS");
 - an Air Traffic Control centre;
 - an Eskom incoming and Substations;
 - a groundwater and potable water treatment facility and storage area;
 - a water pump station;
 - a non-potable treatment facility and storage area;
 - a solid waste area;
 - a firefighting water pump station;
 - areas for airport use; and
 - internal road and services configuration.

- An Airside Precinct, measuring approximately 249ha, which will include the construction of the following:
 - a primary runway of measuring approximately 3.5km in length at an orientation of approximately 01-19 and taxi ways;
 - Solar Photovoltaics ("PV") ;
 - airport parking;
 - a maintenance repairs and operations apron;
 - a cargo apron;
 - an Eskom incoming and substation;
 - a Remote Digital Control Tower System;
 - Localizer, Glidepath antennae, and Precision Approach Path Indicator ("PAPI");
 - Runway End Safety Areas ("RESA") areas around the runway and taxi lanes;
 - Landscaping;
 - firebreaks;
 - establishment of conservation areas;
 - establishment of re-vegetated areas; and
 - internal road and services configuration.

- A Terminal Precinct, measuring approximately 57ha, which will include the construction of the following:
 - landscaping;
 - a passenger terminal building;
 - a car rental and public transport;
 - parking, pick up and drop off area
 - GSE staging;
 - cargo;
 - an energy centre and aircraft sanitary station;
 - a land side substation ("LSS");
 - a hotel;
 - various areas for airport use;
 - aero vintage;
 - restaurants;
 - a petrol and diesel service station;
 - access roads, internal roads and associated infrastructure; and
 - Internal road and services configuration.

- A General Aviation Precinct, measuring approximately 50ha, which will include the construction of the following:
 - a General Aviation/VIP/Government terminal;
 - parking
 - fixed base operators
 - General Aviation hangars
 - a General Aviation Clubhouse and fueling facility;
 - a special cargo facility;
 - an OPS (Operations Centre);
 - access control areas;
 - areas for airport use;
 - a heliport;
 - internal road and services configuration; and
 - signage and billboards.

- Associated infrastructure and components which will include the construction of the following:
 - a sewage pipeline leading to the Fisantekraal Waste Water Treatment Works ("WWTW");
 - a potable waterline;
 - on-site stormwater infrastructure;
 - an Eskom line;
 - access roads and alignment;
 - Solar PV (on buildings);

- perimeter fencing; and
- firebreaks.

Phase 2:

- Continued use of the abovementioned Agricultural Precinct, comprising of the following:
 - areas of intact vegetation for conservation purposes;
 - firebreaks;
 - wetland rehabilitation;
 - wetland offset;
 - existing agricultural areas remaining intact;
 - existing access roads remaining;
 - stormwater infrastructure;
 - a fence line; and
 - a shared security fence line with the Airside precinct.
- Continued use of the abovementioned Services Precinct, which will include the construction of the following:
 - groundwater containment and treatment measures;
 - sewage containment and treatment;
 - containment of treated sewage water (inclusive of emergency storage) and pumpstation;
 - a solid waste area
 - a biodigester (using grass feedstock and treated sewage water);
 - Eskom incoming and LS substation;
 - a firefighting water pump station
 - an Aircraft sanitary station;
 - maintenance, repair, and overhaul ("MRO") hangar;
 - a maintenance area;
 - a parking area;
 - a catering building;
 - GSE maintenance and staging area;
 - a fuel farm and underground fuel line
 - a substation
 - a cargo terminal;
 - Aircraft Rescue and Fire Fighting ("ARFF");
 - an OPS (Operations Centre);
 - an Air Traffic Control Tower
 - an Existing quarry to be used for stormwater retention;
 - internal road and services configuration; and
 - landscaping.
- Continued use of the abovementioned Airside Precinct, which will include the construction of the following:
 - a 3.5km long runway;
 - taxi areas;
 - solar PV;
 - aircraft parking;
 - an MRO apron;
 - a cargo apron;
 - Eskom incoming and substations;
 - a Remote Digital Control Tower System ("RDTS")
 - a PAPI;
 - internal road and services configuration;
 - an underground fuel line;
 - RESA areas around the runway and taxi lanes
 - landscaping;
 - firebreaks;
 - conservation areas; and
 - re-vegetated areas.

- Continued use of the abovementioned Terminal Precinct, which will include the construction of the following:
 - landscaping;
 - a passenger terminal building;
 - a car rental and public transport facility;
 - a parking, pick up and drop off facility;
 - pier expansion reservation;
 - a terminal reserve;
 - GSE staging area;
 - Cargo area;
 - an energy centre and aircraft sanitary station;
 - an LS SS (Land Side Substation);
 - two (2) hotels;
 - airport use area;
 - aero vintage;
 - restaurants
 - a service station; and
 - internal road and services configuration.
- Continued use of the abovementioned General Aviation Precinct, which will include the construction of the following:
 - General Aviation/VIP/Government Terminal;
 - parking;
 - fixed base operators;
 - General Aviation Hangers;
 - General Aviation clubhouse and fueling;
 - a special cargo facility;
 - an OPS (Operations Centre);
 - an access control facility;
 - transport use area;
 - airport use, i.e., associated buildings and facilities and uses supplementary to the runway use;
 - heliport;
 - internal road and services configuration; and
 - landscaping.

The total development footprint amounts to approximately 883ha in extent.

C. SITE DESCRIPTION AND LOCATION

The Listed Activities will be undertaken 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. The overall site is generally bordered by the R312 Regional Road and Garden Cities Urban residential development in the South.

The SG 21-digit codes are given below:

Farm No.	SG 21-digit code
Portion 10 of the Farm No. 724	C05500000000072400010
Remaining Extent of the Farm No. 724	C05500000000072400000
Portion 23 of the Farm No. 724	C05500000000072400023
Portion 7 of the Farm No. 942	C04600000000094200007
Remaining Extent of the Farm No. 474	C05500000000047400000
Portion 3 of the Farm No. 474	C05500000000047400003
Portion 4 of the Farm No. 474	C05500000000047400004

The co-ordinates are given below:

Farm No.	Co-ordinates	
Portion 10 of the Farm No. 724	33°46'13.90"S	18°44'21.28"E

Remaining Extent of the Farm No. 724	33°45'49.16"S	18°44'0.07"E
Portion 23 of the Farm No. 724	33°45'27.43"S	18°43'54.68"E
Portion 7 of the Farm No. 942	33°44'30.59"S	18°44'8.08"E
Remaining Extent of the Farm No. 474	33°45'11.48"S	18°44'41.56"E
Portion 3 of the Farm No. 474	33°45'48.21"S	18°44'37.51"E
Portion 4 of the Farm No. 474	33°46'8.83"S	18°44'41.85"E

Runway and strip co-ordinates:

Point Number	Easting	Northing	Full Description	Longitude	Latitude
1	-23629.1333	-3738473.4669	RWY01-BP-START	E18° 44' 41.67"	S33° 46' 21.56"
2	-23674.0587	-3738362.1937	RWY01-THR	E18° 44' 39.94"	S33° 46' 17.94"
3	-24329.2203	-3736739.4605	RWY01-19-CENTER	E18° 44' 14.64"	S33° 45' 25.22"
4	-24984.3820	-3735116.7272	RWY19-THR	E18° 43' 49.34"	S33° 44' 32.50"
5	-25029.3074	-3735005.4541	RWY19-BP-START	E18° 43' 47.61"	S33° 44' 28.88"

Potable line incoming co-ordinates:

Start point	33°46'35.4496"S	18°44'08.0467"E
Middle point	33°46'40.5740"S	18°43'40.2163"E
End point	33°46'59.7546"S	18°42'44.5603"E

Sewage line outgoing to Fisantekraal WWTW co-ordinates:

Start point	33°45'05.4015"S	18°43'46.0530"E
Middle point	33°45'04.3129"S	18°43'35.4933"E
End point	33°45'07.2134"S	18°43'28.2157"E

Refer to **Annexure 1**: Locality Maps. Refer to **Annexure 2**: Spatial Plan.
The above property is hereinafter referred to as "**the site**".

D. DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

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E. CONDITIONS OF AUTHORISATION

Scope of Authorisation

1. The holder is authorised to undertake the Listed Activities specified in Section B above in accordance with and restricted to Alternative 2 described in Section B above.
2. The holder must commence with, and conclude, the Listed Activities within the stipulated validity period which this Environmental Authorisation is granted for, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority.

This Environmental Authorisation is granted for –

- (a) A period of ten **(10)** years, from the date of issue, during which period the holder must commence with the authorised Listed Activities.
 - (b) A period of twenty **(20)** years, from the date the holder commenced with the authorised Listed Activities, during which period the authorised Listed Activities must be concluded.
3. The holder shall be responsible for ensuring compliance with the conditions by any person acting on his behalf, including an implementing agent, sub-contractor, employee or any person rendering a service to the holder.
4. Any changes to, or deviations from the scope of the alternative described in section B above must be approved in writing by the Competent Authority before such changes or deviations may be implemented. In assessing whether or not to grant such approval, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.

Written Notice to the Competent Authority

5. A written notice of seven (7) calendar days must be given to the Competent Authority before construction work can be commenced with.
 - 5.1. The notice must make clear reference to the site details and EIA Reference number given above.
 - 5.2. The notice must include proof of compliance with the following Conditions described herein:

Conditions: 6, 7, 9, 12, 29, 31, 32, 37, 38, 40.1, 40.2, 40.3, 41.1., 41.2., 41.13, 41.13.1., 41.13.2., 41.13.3., 41.13.4, 41.13.5., 41.13.6., 46, 47, 49.1., 49.2., 49.3.

Notification of Environmental Authorisation and Administration of Appeal

6. The holder must in writing, within fourteen (14) calendar days of the date of this decision–
 - 6.1. notify all registered Interested and Affected Parties ("I&APs") of –
 - 6.1.1. the decision reached on the application.
 - 6.1.2. the reasons for the decision as included in Annexure 4;
 - 6.1.3. the date of the decision; and
 - 6.1.4. the date when the decision was issued.
 - 6.2. draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2025 detailed in Section F below;

- 6.3. draw the attention of all registered I&APs to the manner in which they may access the decision;
- 6.4. provide the registered I&APs with the:
 - 6.4.1. name of the holder (entity) of this Environmental Authorisation;
 - 6.4.2. name of the responsible person for this Environmental Authorisation;
 - 6.4.3. postal address of the holder;
 - 6.4.4. telephonic and fax details of the holder;
 - 6.4.5. e-mail address, if any, of the holder; and
 - 6.4.6. contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the National Appeals Regulations, 2025.

Commencement

7. The Listed Activities, including site preparation, must not be commenced with within (20) twenty calendar days from the date the holder notifies the registered I&APs of this decision.
8. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided.

Management of Activity

9. The Environmental Management Programme ("EMPr") (dated July 2025) is hereby approved, subject to the inclusion of the following provision:
 - 9.1. The implementation of the biodiversity offset requirements that have been made conditional to this Environmental Authorisation.
10. The updated EMPr must be submitted to this Directorate for record purposes prior to the commencement of earthmoving- or construction activities.
11. Environmental Authorisation, the EMPr and MMP must be included in all contract documentation for all phases of implementation.

Monitoring

12. The holder must appoint a suitably experienced Environmental Control Officer ("ECO") before the Listed Activities can be commenced with, to ensure compliance with the EMPr and the conditions contained herein. The ECO must submit ECO reports on a quarterly basis for the duration of the construction phase.
13. A copy of the Environmental Authorisation, EMPr, ECO reports, audit reports and compliance monitoring reports must be kept at the contractor's site office during the construction phase and thereafter the said documents must be kept at the office of the holder and must be made available to any authorised official of the Competent Authority on request.
14. Access to the site referred to in Section C must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see the reports for the purposes of assessing and/or auditing compliance with the conditions contained herein.

Auditing

15. In terms of Regulation 34 of the EIA Regulations, 2014 (as amended), the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation and the EMPr. Environmental audit reports must be compiled and submitted to the Competent Authority. Environmental audit reports must be prepared by an independent person with expertise and must contain all the information required in Appendix 7 of the EIA Regulations, 2014 (as amended).
16. The audit reports must be compiled and subsequently submitted to the Competent Authority in the following manner:
 - 16.1. An audit report must be submitted to the Competent Authority within six (6) months of the commencement of the construction phase; and
 - 16.2. A final audit report must be submitted within three (3) months of the proposed development being completed.
 - 16.3. The holder must submit an environmental audit report every five (5) years while the Environmental Authorisation remains valid.
17. The audit report must indicate compliance status with the Conditions of this Environmental Authorisation, and the EMPr and make recommendations for improved environmental management.
18. The holder must, within seven (7) calendar days of the submission of the audit report to the Competent Authority, notify all registered I&APs of the submission and make the audit report available to any registered I&AP on request and, where the holder has such a facility, place on a publicly accessible website.

Specific Conditions

19. Should any heritage remains be exposed during excavations or any other actions on the site, this must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be disturbed further until the necessary approval has been obtained from Heritage Western Cape.

Heritage remains include, *inter alia*, meteorites, archaeological and/or paleontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.
20. A qualified archaeologist and/or paleontologist must be contracted where necessary (at the expense of the holder) to remove any heritage remains. Heritage remains can only be disturbed by a suitably qualified heritage specialist working in accordance with a directive from the relevant heritage resources authority.
21. An integrated waste management approach must be used based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste that cannot be recycled, re-use shall be disposed of at a licensed waste disposal facility.
22. An Emergency Preparedness and Response Plan must be compiled by a suitably qualified person and must be implemented. The finalised Emergency Preparedness and Response Plan that incorporates the comments obtained from the City of Cape Town must be submitted to this Directorate together with the comments obtained prior to the operation of Phase 1.

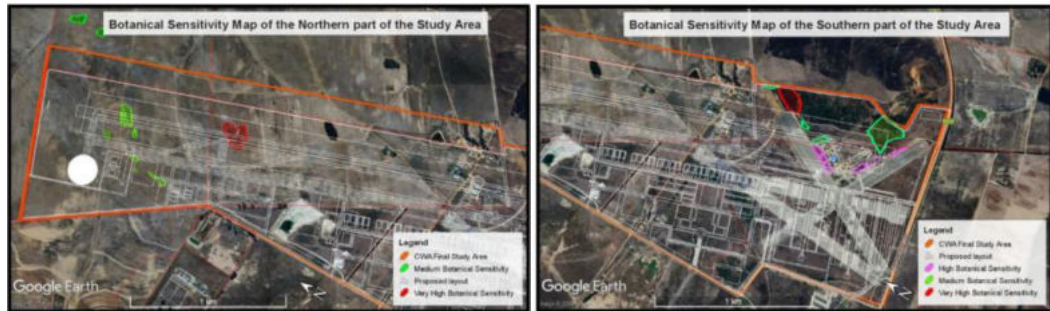
23. A Wildlife Hazard Management Plan must be compiled by a suitably qualified person and must be implemented. The finalised Wildlife Hazard Management Plan that incorporates the comments obtained from the City of Cape Town, the South African Civil Aviation Authority ("SACCA") and CapeNature, must be submitted to this Directorate together with the comments obtained prior to the operation of Phase 1.
24. The Waste Management Plan (dated July 2025 and compiled by PHS Consulting) must be implemented.
25. The Veldfire Management Plan (dated July 2025 and compiled by PHS Consulting) must be implemented.
26. The Alien Vegetation Management Plan (dated July 2025 and compiled by PHS Consulting) must be implemented.
27. A copy of the documentation from the National Department of Water and Sanitation ("DWS"), as it pertains to the wetland offset must be submitted to this Directorate for record purposes.
28. Landscaping Plans for each Precinct must be compiled with input from a suitably qualified specialist botanist and must be implemented. The botanist must advise on, *inter alia*, the use of indigenous Sand Fynbos and Renosterveld appropriate plant component, maximising biodiversity rehabilitation, remaining cognisant of the airport safety guidelines and hydroseeded requirements. Copies of the approved Landscaping Plans must be submitted together with the approval letters prior to the commencement of landscaping for each Precinct.
29. Urban Design Guidelines addressing aspects of fencing, walls, entrances and boundary interfaces, lighting as well as materials and finishes, must be implemented for the development. Copies of the Urban Design Guidelines submitted to the City of Cape Town for approval/input and must be submitted to this Directorate together with the comments obtained for record purposes prior to the commencement of earthmoving- or construction activities.
30. The Groundwater Monitoring and Management Plan must be implemented. A copy of the Groundwater Monitoring and Management Plan approved by the National Department of Water and Sanitation must be submitted to this Directorate for record purposes prior to the operation of Phase 1.
31. A Dust Management Plan must be implemented. The Dust Management Plan, approved by the relevant authority, must be submitted to this Directorate for record purposes prior to the commencement of earthmoving- and construction activities.
32. A Water Scarcity Management Plan must be developed by a suitably qualified specialist to mitigate water scarcity risks and must be implemented. The Water Scarcity Management Plan must be submitted to this Directorate prior to the commencement of earthmoving- and construction activities.
33. The Maintenance Management Plan submitted together with the final EIA Report must be implemented.
34. Based on the Botanical Biodiversity Offset Agreement (dated 29 September 2024), which has been signed by the relevant parties contained therein, the following must be implemented:
 - 34.1. The holder of this Environmental Authorisation must secure the biodiversity offset site through the provision of the necessary resources, as follows:
 - 34.1.1. Ensure the formal protection and effective ecological management of a minimum 89ha of Critically Endangered indigenous vegetation for thirty

(30) years, i.e. Swartland Silcrete, Shale- and Granite Renosterveld vegetation within the northern extent of the Farm Hercules Pilaar No. 1242, Paarl, as delineated in the dark red polygon depicted in Annexure 3 of this Environmental Authorisation:

- 34.1.2. The offset-receiving area must be secured under a formal conservation protection status, in accordance with the recommendation of the CapeNature Stewardship Advisory Committee and the applicable stewardship category endorsed by CapeNature.
- 34.2. The identified offset site must be presented to the CapeNature Stewardship Advisory Committee within two (2) years of the date of this Environmental Authorisation and proof thereof submitted to this Directorate within one (1) calendar week of such presentation having taken place.
- 34.3. The identified offset site must be secured under formal conservation protection, with the aim of achieving its declaration, as a Nature Reserve in terms of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEM: PAA"). This process must include the implementation of title deed restrictions and rezoning under an appropriate stewardship category, as recommended by the CapeNature Stewardship Advisory Committee, within five (5) years from the date of issue of this Environmental Authorisation. Proof of progress towards, and/or confirmation of, the formal declaration and acquired protection status must be submitted to this Directorate, as part of the environmental audit reporting required in terms of Condition 15 of this Environmental Authorisation.
- 34.4. The Botanical Biodiversity Offset Agreement (dated 29 September 2024) entered into between the holder of this Environmental Authorisation and the joint owners of the Farm Hercules Pilaar No. 1242, Paarl must be subject to regular independent audits to ensure the effective implementation of the biodiversity offset, as follows:
 - 34.4.1. Independent audits must be undertaken annually during the construction phase and at least every five (5) years thereafter, until such time as the offset site has been formally declared and received the required Protection Status.
 - 34.4.2. Each independent auditor must assess and report on the following:
 - 34.4.2.1. The ecological condition and performance of the minimum 89ha offset site;
 - 34.4.2.2. The adequacy and effectiveness of the resources provided to achieve the offset objectives; and
 - 34.4.2.3. The need for any corrective or adaptive management measures required to meet the intended conservation outcomes.
 - 34.4.3. The holder of this Environmental Authorisation in collaboration with the identified Public Benefit Organisation must ensure that the offset areas are actively managed and maintained to achieve and sustain the required ecological condition.
35. A final Biodiversity Offset Management Plan must be compiled by a suitable qualified biodiversity offset consultant and must be implemented for the approved offset site. The final Biodiversity Offset Management Plan, which incorporates comments from CapeNature and the relevant City of Cape Town Biodiversity Management Branch, must be compiled prior to the biodiversity offset receiving the required Protection Status. The final Biodiversity Offset Management Plan must be submitted to this Directorate for record purposes together with the comments obtained.
36. The costs of securing and managing the offset site for first thirty (30) years must be the sole responsibility of the holder of this Environmental Authorisation.

37. The approved Stormwater Management Plan must be implemented to adequately manage stormwater and avoid, or if not possible, mitigate the associated stormwater-related impacts. The approved Stormwater Management Plan that incorporates comments from the City of Cape Town must be submitted to this Directorate together with the comments, prior to the commencement of earthmoving- and construction activities.
38. The Bird and Wildlife Hazard Management Landscape and Open Space Planning Guideline (dated February 2024 and compiled by Avri Avian Environmental) must be implemented. The Bird and Wildlife Hazard Management Landscape and Open Space Planning Guideline that incorporates comments from the City of Cape Town, the SACAA and CapeNature, must be submitted to this Directorate together with the comments obtained, prior to the commencement of earthmoving- and construction activities.
39. A detailed Process Hazard Analysis / Hazard and Operability Study ("HAZOP") must be completed for the entire development by an independent chairperson who is registered with the Engineering Council of South Africa and must be implemented. The final Process Hazard Analysis / HAZOP that incorporates comments from the City of Cape Town: Fire and Rescue Services Department must be submitted to this Directorate together with the comments obtained, prior to the commencement of operational activities under Phase 1.
40. The following measures, adapted from the Visual Impact Assessment Report (dated 26 February 2025 and compiled by Filia Visual (Pty) Ltd), must be implemented:
 - 40.1. An Overall Lighting Report must be prepared by a suitably qualified electrical engineer and must be implemented. The approved Overall Lighting Report that incorporates comments from the City of Cape Town must be submitted to this Directorate together with the comments obtained, prior to the commencement of earthmoving- and construction activities.
 - 40.2. A detailed Lighting proposal for all outdoor lighting, i.e., façade lighting (if any), street lighting and security lighting would be visible from within the receiving environment that focuses on the sensitivities of the adjacent cultural Landscape and the relevant scenic routes, must be prepared and implemented. The approved Lighting proposal that incorporates comment from the City of Cape Town must be submitted to this Directorate together with the comments obtained, prior to the commencement of operations of Phase 1.
 - 40.3. A Signage Plan must be developed in terms of the Outdoor Advertising and Signage Policy and By-law and must be implemented. A copy of the approved signage plan that incorporates comments from the City of Cape Town must be submitted to this Directorate together with the comments obtained for record purposes prior to any signage being erected on the site.
41. The following measures adapted from the Plant Species Impact Assessment Report (dated 10 February 2025 and compiled by Nick Helme Botanical Surveys), must be implemented:
 - 41.1. All hard infrastructure bordering on any of the mapped areas of 'Very High', 'High' and 'Medium' sensitivity botanical areas must be surveyed and fenced off. The fencing must be marked with signage to indicate that these are 'no-go' areas at 15m intervals, prior to any commencement of earthmoving- or construction activities.
 - 41.2. Where the perimeter of fenced off areas are positioned within 20m of the RESA (runway clearance area), it must be buffered by an ecological buffer area of at least 5m wide that is not disturbed by any earthmoving activities or development.
 - 41.3. No perimeter service road may traverse nor disturb the mapped areas of 'Very High' sensitivity east of the main runway.

- 41.4. All 'Very High', 'High' and 'Medium' sensitivity areas in the below image that fall outside the development (construction) footprint must be appropriately conserved, which must include but not limited, no development and no infrastructure being located in these areas, ecologically connecting these areas with other areas via rehabilitation, and ongoing alien invasive vegetation management.



- 41.5. All invasive alien vegetation in the conservation areas on the site must be removed within one (1) year of the date of issue of this Environmental Authorisation, by appropriately qualified personnel.
- 41.6. Ongoing annual alien vegetation removal must be undertaken.
- 41.7. No spraying of herbicide must be undertaken in any conservation area.
- 41.8. Once all alien invasive vegetation has been removed from the conservation areas all these areas must be subject to planned (controlled) burn regimes that must be professionally managed.
- 41.9. Prior to the controlled burn, firebreaks must be established around the perimeter of the sensitive areas (not within them) using handheld brush cutters. No heavy machinery must be used to establish the firebreaks.
- 41.10. The botanically sensitive areas must be burnt every 8-12 years for optimum ecological functioning.
- 41.11. The 'Very High' sensitivity areas falling within the Agricultural Precinct must be fenced off and excluded from grazing and trampling by livestock (especially cattle). The fencing off of this area must be completed within sixty (60) days of the date of issue of this Environmental Authorisation.
- 41.12. The conditions of all 'Very High', 'High' and 'Medium' sensitivity area, which includes the Agricultural Precinct, must be monitored every year by a suitably qualified botanist. The appointed botanist must make recommendations for any management changes or actions, i.e., alien clearing, lack of fire, etc., that are needed in order to achieve optimal ecological functioning in these areas.
- 41.13. A search and rescue operation must be done in consultation with the botanist. The search and rescue operation must be undertaken prior to the commencement of earthmoving- or construction activities, and must include the following:
- 41.13.1. The translocation of Species of Conservation Concern ("SCC") searched and rescued within the development footprint;
 - 41.13.2. The translocation of plants and material searched and rescued within the 'Very High', 'High' and 'Medium' sensitivity areas;
 - 41.13.3. The collection of seed, sods and cuttings;

- 41.13.4. Keeping record of where the collected seed, sods and cuttings were stored and the quantities of seed, sods and cuttings stored;
- 41.13.5. Keeping record of how the receiving sites were identified and prepared to receive the collected seed, sods and cuttings; and
- 41.13.6. Implementing measures that will guide ongoing maintenance of the receiving areas.
- 41.14. Brush cutting and mowing of open airside (hydroseeded) areas during the operational phase must be timed to allow for winter growth, spring flowering and early summer fruiting of most of the indigenous plant species and must thus not be undertaken between 1 June and 15 October (provided that this is not in conflict with operational safety protocols).
- 42. The following measures adapted from the final EIA Report (dated July 2025 and compiled by PHS Consulting), must be implemented:
 - 42.1. A certified Pest Control Company must be appointed at the onset of the construction- and operational phases to ensure that preventative measures are put in place. The measures must be monitored to ensure the effectiveness of the Pest Control measures being implemented. Should any recommendations for improvements be required, then such information must be included in a revised Waste Management Plan that must be implemented. The updated Waste Management Plan must be submitted to this Directorate for record purposes.
 - 42.2. The Colenso Fault located to the north-east section of the site, must be treated as a 'no-go' area to ensure that high-risk activities such as the aviation fuel farm, bulk fuel storage, retail service station or other associated activities are prohibited within this area.
 - 42.3. The Agricultural Precinct must be treated as a 'no-go' area throughout the lifecycle of the development.
 - 42.4. The exposed water surface area of the rehabilitated quarry must be suitably covered, as far as possible, in order to mitigate the attraction of birdlife.
 - 42.5. Suitable vegetation must be planted on either side of the ponds to discourage bird movement between ponds.
- 43. The obstacles listed under Appendix A of this Decision must be clearly marked and identified with day and night markings of buildings and obstacles.
- 44. The following measures adapted from the Air Quality Impact Assessment Report (dated June 2025 and compiled by DDA Environmental Engineers), must be implemented:
 - 44.1. Dust monitoring along the western, southern and northern boundaries must be conducted monthly during construction and reported quarterly to the relevant authorities, including this Directorate. Any noted exceedances in the prescribed guidelines and requirements, e.g., municipal by-laws, must be treated with appropriate rectification measures and proof thereof included in the report to be submitted to the relevant authorities.
 - 44.2. A continuous air quality monitoring station must be established along the northern boundary of the site prior to the operational phase. The air quality monitoring station must monitor air pollutants, including SO₂, NO_x, PM¹⁰ and Benzene. The monitoring results must be reported to the relevant authorities, including this Directorate on a biannual basis (six monthly). Any noted exceedances in the prescribed guidelines and requirements must be treated with appropriate

rectification measures and proof thereof included in the report to be submitted to the relevant authorities.

45. The following measures adapted from the Noise Impact Assessment Report (dated June 2025 and compiled by DDA Environmental Engineers), must be implemented:
 - 45.1. Noise mitigation measures must be finalised prior to commencement of the operation in terms of Scenario 3, *i.e.*, operation of the new runway at full capacity taking place. A copy of the finalised noise mitigation measures that must be implemented accordingly must be submitted to this Directorate as well as all relevant authorities and stakeholders prior to the commencement and operation in terms of the abovementioned Scenario 3 taking place.
 - 45.2. Noise monitoring in accordance with the relevant methods stipulated in the South African National Standards ("SANS") codes and current Western Cape Noise Control Regulations, 2013 (Provincial Notice 200 of 2013), must be conducted on a quarterly basis during the construction phase and conducted monthly when night-time construction takes place.
 - 45.2.1. Quarterly reports must be submitted to the relevant authorities as well as this Directorate.
 - 45.2.2. The quarterly reports must report any construction-specific noise exceedances above the noise standards and measures stipulated in the SANS 10103:2008 and SANS 10328:2008 (or latest versions).
 - 45.2.3. In the event of exceeding the said noise standards and measures, appropriate site- and operation-specific noise mitigation measures must be investigated and implemented, and proof thereof included in subsequent reports submitted to the relevant authorities as well as this Directorate.
 - 45.3. A noise complaints registry must be established and connected with the noise monitoring system, in order to provide the capability for correlation of the complaints with the actual measured levels, as well as the aircraft-related operational data. The complaints and relevant aircraft-related operational data must be included in the quarterly reports submitted to the relevant authorities.
 - 45.4. Three permanent noise monitoring terminals must be established before the commencement of the operational phase. The first of these terminals must be established at the Klipheuwel area, preferably close to its southeastern boundary. The second must be positioned within the Greenville Garden City residential development site in line with the new runway 01/19, and the third on the eastern side of the Bella Riva development site. The resultant noise monitoring results must be reported on a quarterly basis to the appropriate authorities as well as this Directorate and must include, but not be limited to, the following:
 - 45.4.1. 24-hour equivalent continuous A-weighted sound pressure level, LAeq,T;
 - 45.4.2. equivalent continuous day-night rating level, LRdn;
 - 45.4.3. equivalent continuous day and night rating levels, LRd and LRn;
 - 45.4.4. maximum A-weighted level, LAmax;
 - 45.4.5. percentile levels Ln;
 - 45.4.6. number of exceedances above 70 dB(A) and 60 dB(A) of the LAmax and SEL; and

45.4.7. complaints and relevant aircraft-related operational data.

46. A Noise Mitigation and Management Plan ("NMMP"), with measurable goals to prevent and intricately manage noise emissions from the operational phase of the development must be compiled and implemented. The NMMP that incorporates comments from all relevant authorities, including this Department's Air Quality Management Directorate, the City of Cape Town and the SACAA must be submitted to this Directorate together with all comments obtained, prior to the commencement of any earthmoving or construction activities.
47. A Service Infrastructure Management Plan must be compiled to, *inter alia*, stipulate the frequency by which service infrastructure will be serviced. These include the sewer- and water treatment plants, bio-digester and sewer conveyance infrastructure. The Service Infrastructure Management Plan must be implemented and must be submitted to this Directorate prior to the commencement of earthmoving- and construction activities.
48. Copies of the following instruments, as approved by the relevant Competent Authorities, must be submitted to this Directorate for record purposes:
 - 48.1. RNP approach procedures;
 - 48.2. Instrument Landing System approach procedures;
 - 48.3. RNAV Standard Instrument Departures; and
 - 48.4. RNAV Standard Instrument Arrivals (standard terminal arrival routes).
49. The following measures adapted from the Socio-Economic Impact Assessment Report (dated 30 May 2025 and compiled by Dr. Jonathan Bloom), must be implemented:
 - 49.1. A Procurement Strategy must be compiled and must be implemented. The Procurement Strategy must be submitted to this Directorate prior to the commencement of earthmoving- and construction activities.
 - 49.2. A Communication Strategy must be compiled and must be implemented. The Communication Strategy must be submitted to this Directorate prior to the commencement of earthmoving- and construction activities.
 - 49.3. A Social Engagement Plan, formal monitoring systems and contingency plans to deal with any larger-than-expected in-migration must be prepared by a suitably qualified person to assist with the management of jobseekers and community business forums and must be implemented. The Social Engagement Plan must be submitted to this Directorate prior to the commencement of earthmoving- and construction activities.
 - 49.4. A lighting audit must be conducted by the appointed ECO at the end of the construction phase of each precinct (excluding the Agricultural Precinct) to ensure that all lighting-related mitigation measures are adhered to and successfully implemented. A copy of the lighting audit report must be submitted to this Directorate.

F. RECOMMENDATIONS

1. The holder of the Environmental Authorisation should, within six (6) months from the date of issue of this Environmental Authorisation, initiate consultation with the CapeNature Advisory Panel to ensure that the Biodiversity Offset Site is transferred into stewardship through a formal Stewardship Agreement with CapeNature after the conclusion of the 30-year management period of the biodiversity offset site.

2. The holder should thereafter provide this Directorate with a status report every six (6) months until the Stewardship Agreement or contract has been finalised.
3. The holder should submit the final Stewardship Agreement or contract to this Directorate within thirty (30) days after it has been finalised, for record purposes.

G. GENERAL MATTERS

1. Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the Listed Activities.
2. Non-compliance with any Condition of this Environmental Authorisation or any provision of the EMPr may render the holder liable for criminal prosecution.
3. If the holder does not commence with the Listed Activities within the period referred to in Condition 2, this Environmental Authorisation shall lapse. If the holder wishes to extend the validity period of the Environmental Authorisation, an application for amendment in this regard must be lodged with the Competent Authority prior to the expiry date.
4. An application for amendment of the Environmental Authorisation must be submitted to the Competent Authority where any detail with respect to the Environmental Authorisation must be amended, added, substituted, corrected, removed or updated. If a new holder is proposed, an application for Amendment in terms of Part 1 of the EIA Regulations, 2014 (as amended), must be submitted.
5. Please note that an amendment of the Environmental Authorisation is not required for a change in the contact details of the holder. In such a case, the Competent Authority must only be notified of such changes.
6. The manner and frequency for updating the EMPr must be made in accordance with Regulations 35 to 37 of GN No. R.982 (as amended) or any relevant legislation that may be applicable at the time.

H. APPEALS

Appeals must comply the National Appeal Regulations, 2025 (Government Notice No. R. 5985 in Government Gazette No. 52269 of 13 March 2025). Please note the provisions of Regulations 1 (2) and (3) of the National Appeal Regulations, 2025 when calculating the period of days.

1. The holder (applicant) of this decision must submit an appeal to the Appeal Administrator, any registered I&APs and the decision maker (Competent Authority who issued the decision) within twenty (20) calendar days from the date this Decision was sent by the decision maker.
2. The I&APs (not the holder of this Decision) must submit an appeal to the Appeal Administrator, the holder (applicant) of the Decision and the decision maker within twenty (20) calendar days from the date this Decision was sent to the registered I&APs by the holder (applicant) of the decision.
3. All appeals submitted must:
 - a. be in writing in the appeal form obtainable from the Departmental website;
 - b. include supporting documents referred to in the appeal; and
 - c. include proof of payment of the prescribed non-refundable appeal fee, if prescribed.
4. The holder (applicant) of the decision must:
 - a. notify registered I&APs and affected organs of state of any appeal received, and make the appeal available to them, within five (5) calendar days after the 20-day appeal period ends.

- b. Submit proof of this notification to the Appeal Administrator within five (5) calendar days after sending the last notification.
5. The applicant, where applicable, the decision-maker, or any person notified under Regulation 4 of the National Appeal Regulations, 2025 may submit a Responding Statement within twenty (20) calendar days from the date they received the appeal, in the form obtainable from the Department website to the Appeal Administrator and to the appellant, where the appellant is not the applicant.
6. Appeals, Responding Statements and supporting documents must be submitted to the Appeal Administrator by means of one of the following methods:
 - a. By e-mail:
DEADP.Appeals@westerncape.gov.za or
 - b. By hand where that person submitting does not hold an electronic mail account:
Attention: Mr Marius Venter
Room 809, 8th Floor Utilitas Building,
1 Dorp Street, Cape Town, 8001

Note: You are also requested to submit an electronic copy (Microsoft Word format) of the appeal, responding statement and any supporting documents to the Appeal Administrator via email or to the address listed above.

A prescribed appeal form, responding statement form as well as assistance regarding the appeal processes is obtainable from the relevant website of the Appeal Authority: <http://www.westerncape.gov.za/eadp> or the office of the Minister at: Tel.: (021) 483 3721 or email: DEADP.Appeals@westerncape.gov.za

I. DISCLAIMER

The Western Cape Government, the Local Authority, committees or any other public authority or organisation appointed in terms of the conditions of this Environmental Authorisation shall not be responsible for any damages or losses suffered by the holder, developer or his successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.

Your interest in the future of our environment is greatly appreciated.

Yours faithfully

Zaahir Toefy Digitally signed by Zaahir Toefy
Date: 2025.10.27 21:21:19
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MR. ZAAHIR TOEFY
DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)
WESTERN CAPE GOVERNMENT: ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

DATE OF DECISION: 27 OCTOBER 2025

Copied to:

- (1) Ms. Amanda Fritz-Whyte (PHS Consulting)
- (2) Mr. Paul Slabbert (PHS Consulting)
- (3) Ms. Sonja Warnich-Stemmet (City of Cape Town)

E-mail: amanda@phsconsulting.co.za

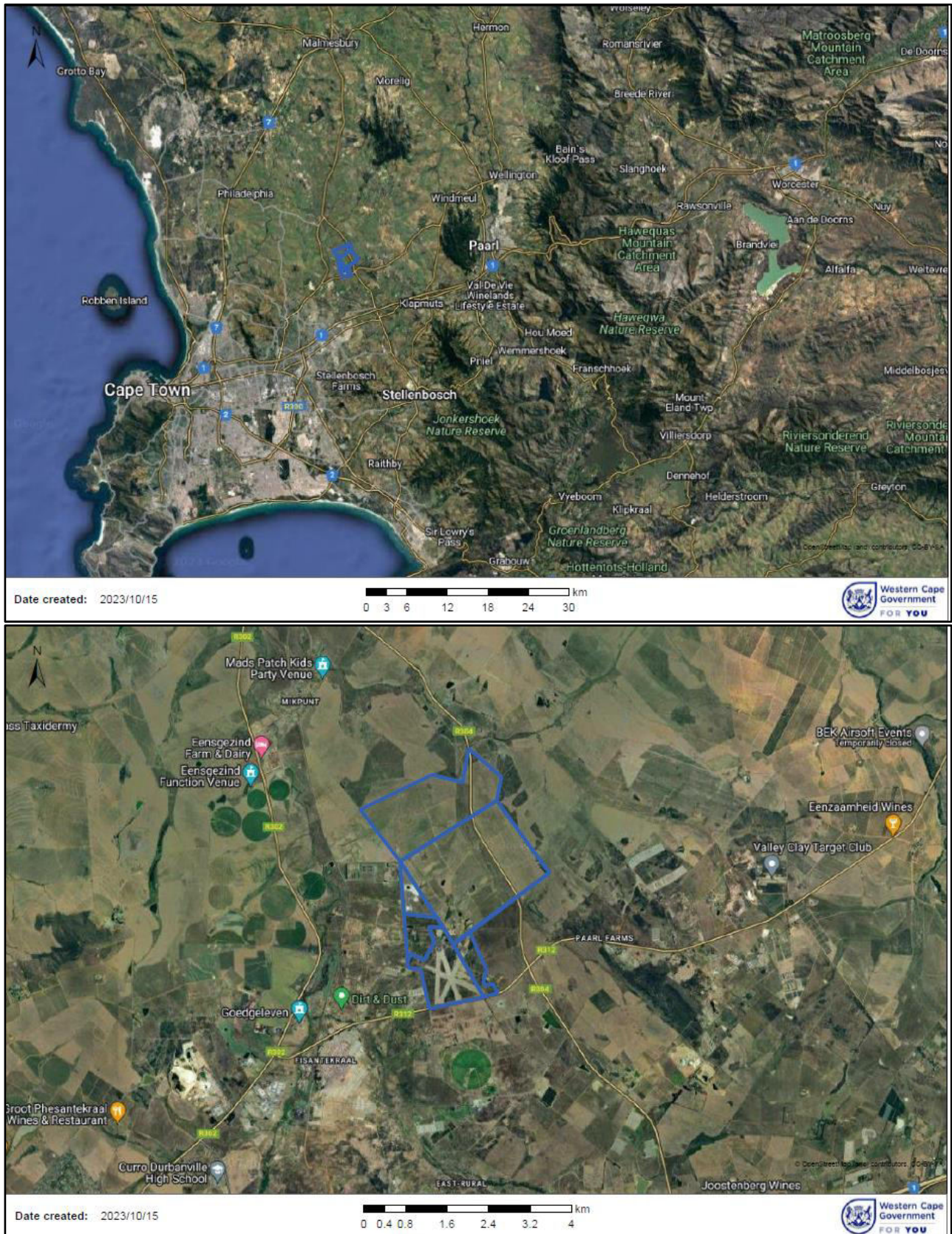
E-mail: paul@phsconsulting.co.za

E-mail: sonja.warnichstemmet@capetown.gov.za

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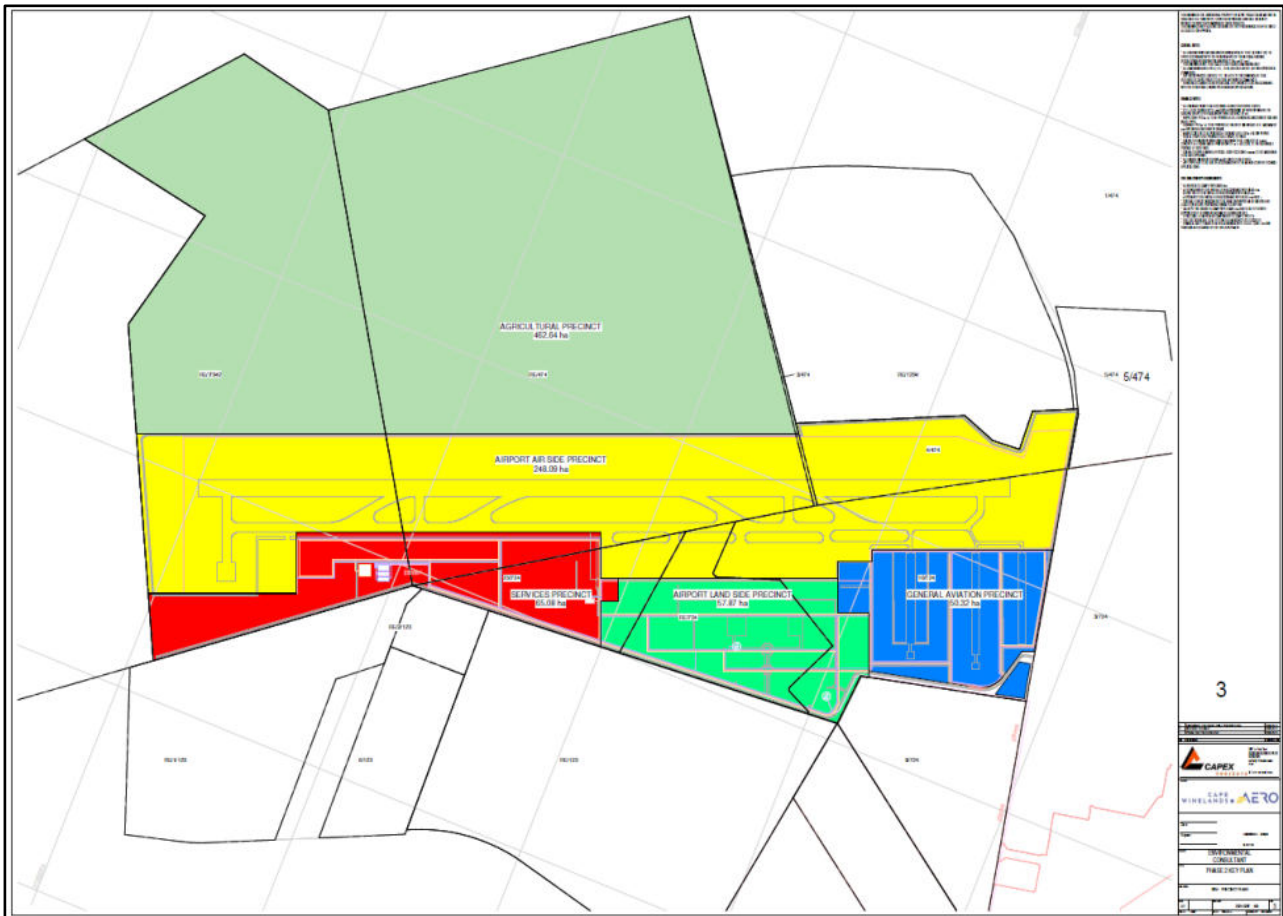
EIA REFERENCE: 16/3/3/2/A5/20/2046/24
NEAS REFERENCE: WCP/EIA/0001497/2024

ANNEXURE 1: LOCALITY MAPS

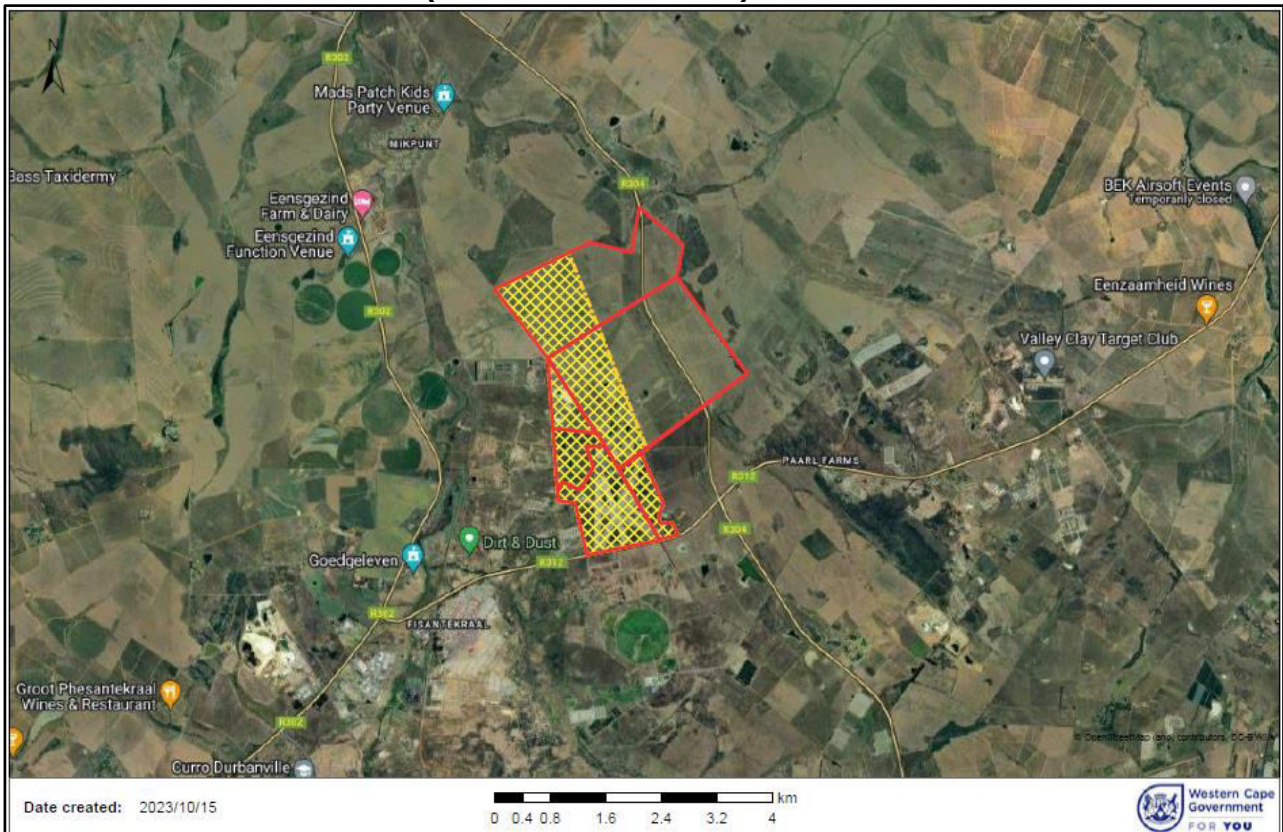


ANNEXURE 2: THE SPATIAL PLANS

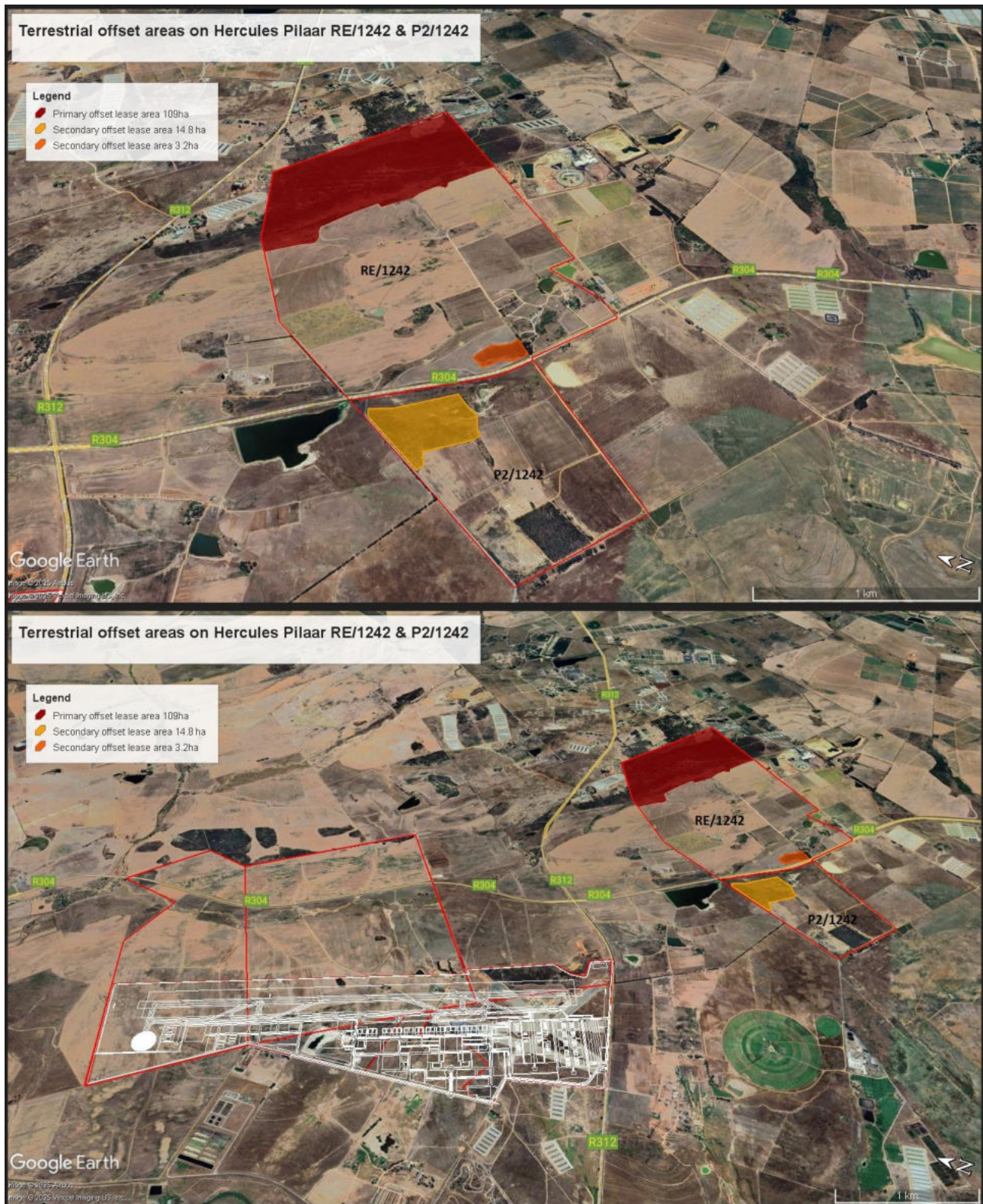
THE PRECINCT PLAN



THE DEVELOPMENT AREA LAYOUT (HATCHED YELLOW AREA)



ANNEXURE 3: Biodiversity Offset Maps



ANNEXURE 4: REASONS FOR THE DECISION

In reaching its decision, the Competent Authority considered, *inter alia*, the following:

- a) The information contained in the Application Form received by this Directorate via electronic on 23 July 2024, the final Scoping Report and Plan of Study received by this Directorate on 6 September 2024, the final EIA Report received by this Directorate on 11 July 2025, the EMP (dated July 2025) and all supporting information.
- b) Relevant information contained in the Departmental information base, including the Guidelines on Public Participation, Need and Desirability and Alternatives (dated March 2013);
- c) The objectives and requirements of relevant legislation, policies and guidelines, including section 2 of the NEMA;
- d) The comments received from I&APs and the responses thereto, included in the final BAR; and
- e) The balancing of negative and positive impacts and proposed mitigation measures.
- f) A site visit was conducted by Mr. Zaahir Toefy (Competent Authority), Officials of the Directorate: Development Management (Region 1) Ms. Natasha Bieding and Ms. Shameemah Heugh, Mr. Deon Cloete (Capewineland Aero (Pty) Ltd), Ms. Adele Klingenberg (existing CWA) and Mr. Paul Slabbert and Ms. Amanda Fritz-Whyte (PHS Consulting) on 22 October 2025.

All information presented to the Competent Authority was taken into account in the consideration of the application for Environmental Authorisation. A summary of the issues that were considered to be the most significant for the decision is set out below.

1. Public Participation

The Public Participation Process ("PPP") included the following:

Pre-Application Phase

- Notification letters were sent to neighbouring landowners via email on 7 November 2023;
- Surrounding (adjacent) landowners, key I&APs and authorities were notified and engaged during the PPP via email on 7 November 2023;
- Landowners were asked to notify their tenants of the proposal and the commenting period on 7 November 2023 (via letter attached to email);
- The relevant Ward Councillors were consulted on 7 November 2023 (via email) and remained registered on the database of I&APs;
- Written notifications sent via email to the Municipal Ward Councillors on 7 November 2023;
- A public meeting was held on 8 May 2024 at the Fisantekraal Community Hall;
- The project team, including the EAP, attended a meeting with the Durbanville Farmers Association on 4 June 2024 during which the EAP was requested to present on the proposed development;
- English and isiXhosa advertisements were placed in the 'Tygerburger' Newspaper (Durbanville) on 8 November 2023;
- An Afrikaans advertisement was placed in 'Die Burger' Newspaper on 8 November 2023;
- An English advertisement was placed in 'The Cape Times' Newspaper on 8 November 2023;
- Three notices in English, Afrikaans and isiXhosa were placed at three locations on or near the site on 8 November 2023;
- The pre-application Scoping Report and supporting documentation was made available for a minimum commenting period of thirty (30) days from 8 November 2023 to 8 December 2023. All late I&AP registration and comments were accepted and incorporated in the I&AP register and included in the Comments and Responses Report;
- A hard copy of the Scoping Report was placed at the Fisantekraal Public Library for public viewing on 8 November 2023;
- A site notice was pinned on the Fisantekraal Public Library notice board on 8 November 2023; and
- A public meeting was held on 8 May 2024 in Fisantekraal.

Matters raised in the comments received during the abovementioned PPP include the following:

- The site requires a closure certificate regarding the existing quarry;
- Requests to be registered as I&APs;
- Objections against the development proposal;
- Traffic congestion and infrastructure constraints due to the proposed airport expansion;
- Noise pollution;
- Impacts of air quality and emissions;
- Impacts on the ecology of wetlands must be considered;
- Negative impacts on the Garden Cities Development;
- Liaising with the relevant and Competent Authorities;
- Associated impacts on the Cape Town International Airport ("CTIA") from an aviation and sustainability perspective;
- Light pollution;
- Air pollution;
- Noise pollution;
- The applicability of municipal forward planning policies;
- The municipal bulk services and other associated infrastructure requirements;
- Further considerations required in terms of the biodiversity related impacts;
- The need for community meetings and engagements;
- Support of the proposed development;
- Impacts on the local and surrounding residents and receiving environment; and
- The need for robust assessments by accredited persons.

Draft Scoping Application Phase

- Copies of the draft Scoping Report were made available for a minimum commenting period of thirty (30) days from 24 July 2024 to 26 August 2024;
- Registered I&APs and commenting authorities were notified of the availability of the draft Scoping Report on 23 July 2024;
- Focus group meetings were held on 16 August 2024 (Fisantekraal community leaders), 17 August 2024 (Durbanville Heritage Society) and 22 August 2024 (CoCT Noise and Air Quality), respectively;
- A hard copy of the draft Scoping Report was placed at the Fisantekraal Public Library on 23 July 2024;
- A site notice was pinned on the Fisantekraal Public Library notice board on 23 July 2024;
- An advertisement in English in the 'Tygerburger' Newspaper on 24 July 2024; and
- Three site notices in English, Afrikaans and isiXhosa were placed at three locations on or near the site on 23 July 2024.

Matters raised in the comments received during the abovementioned PPP include the following:

- Extension requested on the deadline for providing comment on the Scoping Report;
- Need and viability of a second commercial international airport;
- Security of fuel supply for the CWA expansion;
- The CWA expansion not having been considered in terms of government policy(s);
- Airspace design requirements;
- The impact of CWA expansion on the future development of the CTIA;
- Inadequacies of the Concept of Operations Study;
- A more detailed study regarding the CTIA versus CWA expansion airspace is required;
- Impacts on the operations of the 'Westelike Provinsie Oesbespuiting Maatskappy';
- Requests to be registered as an I&AP;
- Traffic impacts on the local roads;
- Noise pollution;
- Civil Aviation Regulations with respect to bird/wildlife strike prevention programme and other applicable requirements to be met;
- Objections to the proposal;
- Impacts on existing aviation facilities in Stellenbosch;
- Noise impact, including noise contours;
- Impacts on airspace and inadequacies in the Airspace Conops Report;
- Impacts of noise, pollution, congestion and crime on Mikipunt resident(s);
- Accreditation of specialists;
- Impacts on rural living;

- Impacts on wildlife;
- Insufficiency of certain specialists studies;
- Negative impacts on the local residents;
- Transparency in public participation required;
- Concerns and impacts on the County Fair poultry farm;
- Need for an alternative location;
- Impacts on the Bella Riva development;
- Aquatic related impacts;
- The relevance of the strategic and Municipal context of the receiving area;
- Impacts on the surrounding areas;
- Impact on communications infrastructure (masts); and
- General support and requests to form partnerships with the expanded airport.

Draft EIA Phase

- Copies of the draft EIA Report were made available for minimum commenting period of thirty (30) days from 13 November 2024 to 13 December 2024;
- An extension on the above comment period was granted until 13 January 2025;
- A public open day was held on 20 November 2024;
- Registered I&APs and commenting authorities were notified of the availability of the draft EIA Report on 13 November 2024;
- An advertisement in English was placed in the 'Tygerburger' Newspaper on 13 November 2024;
- Three site notices in English, Afrikaans and isiXhosa were placed at three locations on or near the site on 13 November 2024;
- A hard copy of the draft EIAR was placed at the Fisantekraal Public Library on 13 November 2024; and
- A site notice was pinned on the Fisantekraal Public Library notice board on 13 November 2024.

Matters raised in the comments received during the abovementioned PPP include the following:

- What the flight paths for landings and departures will be;
- Noise impacts and pollution;
- Increased fire risks;
- Impact on existing farming practices and areas;
- Increased air traffic over local properties;
- Objections against the development proposal;
- Air quality emissions at the CTIA that can be incorporated into the Air Quality Impact Assessment and modelling;
- Assessment of individual case studies regarding existing airports;
- Support for the development proposal;
- Inadequate time to provide comments and have public participation processes underway;
- The transport and traffic related requirements to be adhered to;
- Impact on property values;
- Request for extension of the PPP;
- Impacts on the existing Greenville residential development;
- Impacts on the local area's poultry operations;
- Desirability of the CWA expansion in the context of existing local aviation sector raised by the Airports Company South Africa; and
- Safety and security resulting from the CWA expansion.

Revised draft EIA Phase

- Copies of the revised draft EIA Report were made available for a longer commenting period of 45 days from 19 March 2025 to 13 May 2025;
- Registered I&APs and commenting authorities were notified of the availability of the draft EIA Report on 19 March 2025;
- English and isiXhosa advertisements were placed in both the Durbanville and the Kraaifontein editions of the 'Tygerburger' Newspaper on 19 March 2025;
- An Afrikaans advertisement was placed in the 'Die Burger' Newspaper on 19 March 2025;

- Three site notices in English, Afrikaans and isiXhosa were placed at three locations on or near the site on 18 March 2025;
- A hard copy of the amended EIA Report was placed at the Fisantekraal Public Library on 19 March 2025;
- A site notice was pinned on the Fisantekraal Public Library notice board on 19 March 2025;
- A second public open day was held on 15 April 2025 at the Goedgeleeven Venue, Klipheuwel Road, Durbanville ;
- The CWA expansion project team participated in the Paardeberg Sustainability Initiative's Farmer's Day on 20 March 2025 where they delivered a presentation followed by a Question and Answer session; and
- A focus group meeting was held on 15 April 2025 with an I&AP who operates a parrot sanctuary in Mikipunt.

Matters raised in the comments received during the abovementioned PPP include the following:

- Potential negative impacts on the local area, including Durbanville and Fisantekraal;
- Support for the proposal;
- How the local road network will be affected;
- Traffic impacts;
- Noise impacts;
- Air pollution;
- Impacts on local agricultural areas and operations;
- Further requirements must be met in terms of the landuse applications and air emissions licence;
- The impacts on the County Fair poultry farm property due to operations of the development proposal;
- Need and desirability of development proposal;
- Inadequacy of alternatives considered;
- Specific biodiversity offset requirements;
- Objection against the development proposal; and
- Impacts on the CTIA by the CWA expansion, as proposed second airport in Cape Town.

Proof of having responded to all of the abovementioned matters raised, including objections, have been included in the Comments and Response Report that was submitted together with the final EIA Report. In certain instances, the abovementioned matters raised resulted in either adjustments being made to the development proposal or additional studies being commissioned and the recommendations thereof incorporated into the development proposal and included in subsequent reports that were circulated for further comments.

Additionally, consideration was given to comments and feedback that was received after the conclusion of the abovementioned commenting periods.

On 16 July 2025, an email notification was sent to all registered I&APs, stakeholders and authorities to inform them of the fact that the final EIA Report and supporting documentation was submitted to the Competent Authority.

Additional PPP related measures included the following:

- A hard copy of the final EIA Report and supporting documentation was placed at the Fisantekraal Public Library on 16 July 2025;
- A site notice was pinned on the Fisantekraal Public Library notice board on 16 July 2025;
- On 4 August 2025, updated information was placed on the PHS Consulting Website as well as placed at the Fisantekraal Public Library; and
- On 10 September 2025, a document on the late comments received (addendum to Appendix 29D) was posted on the PHS Consulting Website, and a hard copy was placed at the Fisantekraal Public Library on 12 September 2025.

Matters raised after the final EIA Report was submitted to the Competent Authority include the following:

- Further clarification regarding the local airspace impacts;
- Where previous objections against the proposal can be viewed;

- The proposed flight path and options for air traffic arriving and departing the expanded airport;
- Impacts of flight paths on the Paardeberg Conservancy;
- Support for the development proposal; and
- How the site will be powered (electricity).

The EAP provided proof of having noted and acknowledged the abovementioned matters raised, even if such matters were raised after the legislated PPP commenting period ended. In this regard that EAP also further confirmed that the expanded airport's will not directly impact the Paardeberg Conservancy.

Relevant State Departments and Organs of State consulted during the abovementioned PPPs include the following:

- CapeNature;
- City of Cape Town;
- Heritage Western Cape;
- West Coast District Municipality;
- Western Cape Government: Mobility;
- Western Cape Government: Agriculture;
- Western Cape Government: Infrastructure;
- Western Cape Government: Environmental Affairs and Development Planning (various Directorates);
- National Department of Water and Sanitation;
- National Department of Mineral Resources and Energy; and
- National Department of Agriculture, Land Reform and Rural Development.

Furthermore, the following Stakeholders have been invited to participate during one or more of the abovementioned PPPs:

- Eskom;
- Transnet;
- Paardeberg Conservancy;
- Birdlife South Africa; and
- The Passenger Rail Agency of South Africa.

It should be further noted that whilst the proposed development falls within the City of Cape Town municipal boundary, municipalities from outside the City of Cape Town municipal boundary were also invited to provide inputs and comments during the abovementioned PPPs. These municipalities are the Drakenstein Municipality, Stellenbosch Municipality, Swartland Municipality and Cape Winelands Municipality. No objections nor substantive comments were provided from the said Municipalities.

All responses submitted after the abovementioned PPPs concluded were made available to the Competent Authority and included in the Comments and Responses Reports.

The Directorate is satisfied that the PPP that was followed met the minimum legal requirements. In addition to the minimum PPP requirements having been met, is further noted that various stakeholder engagements, a public open day and focus group meetings were hosted during the scoping and EIA application process as well as extensions granted during specific PPPs in response to extension requests received from I&APs.

Specific management and mitigation measures have been considered in this Environmental Authorisation and in the provisions of the EMPr to address any significant concerns raised.

2. Alternatives

Scoping Phase:

Early during the scoping phase of the application process, three Alternatives were identified and considered, *namely*; (a) one Location Alternative (*i.e.*, the expansion of the existing CWA), (b)

the 'No-Go' Alternative (*i.e.*, no expansion of the existing CWA), and (c) the Preferred Alternative (*i.e.*, the expansion of the existing CWA), were considered.

Only the 'No-Go' Alternative and the Preferred Alternative were further assessed during the EIA phase of the application process. Based on the assessment of impacts during the EIA phase, additional changes were made to the Preferred Alternative. These changes include, *inter alia*, the following:

- (a) The removal of the cross runway;
- (b) Exclusion of the chicken manure to the biodigester;
- (c) Exclusion of the wind energy options;
- (d) Inclusion of both sewer to on-site treatment as well as servicing via the Fisantekraal WWTW;
- (e) Inclusion of additional boreholes to be drilled;
- (f) Inclusion of an incoming potable line from the southwest;
- (g) Extension of the fuel line into the General Aviation Precinct area; and
- (h) Minor amendments to internal precinct boundaries.

These changes resulted in a new Preferred Alternative 4 (discussed below, as Alternative 2), which was further assessed during the EIA phase.

The reasons for only assessing one Location Alternative is based on the following reasons:

- Land availability, shape and size (the necessary land has been secured);
- The consideration of technical and operational requirements, *inter alia*, suitable terrain, absence of geographical obstructions, suitable meteorological conditions, it being possible to integrate with existing air traffic patterns, and the presence of adequate geotechnical requirements for runway construction;
- Connectivity, *i.e.*, good proximity to major roads and rail infrastructure, accessibility and proximity to urban centres;
- Regulatory and legal considerations, *namely*; existing zoning for the use of the site for airport operations and aviation policy whereby the proposed airport will financially be self-sustaining and privately funded;
- The applicable environmental and ecological factors, *inter alia*, site's positioning to safeguard operations whilst minimising noise-related disruptions, proper site drainage due to the elevated ridge present, presence of boreholes for water supply and easy integration into municipal service infrastructure network, the site's location outside of the exclusion zoned, including the Koeberg Nuclear Power Station zones; and
- Economic and financial considerations, *namely*; lower development costs will ensue when compared to developing a greenfield site and the potential to serve as a cost-efficient alternate airport option in terms of diversion planning and fuel contingencies.

The 'No-Go' Alternative, *i.e.*, no expansion of the existing CWA, has been considered during the scoping phase.

EIA Phase:

During the EIA phase, Alternative 1 (the 'No-Go' Alternative), Alternative 2 (the phased expansion of the CWA, which omits a short crosswind runway and includes further adjustments made, including *inter alia*, (1) the fuel line extending into the General Aviation Precinct, (2) amending the internal precinct boundaries, (3) the usage of 3 boreholes, and (4) the installation of an incoming potable line), and Design/Technology Alternatives were assessed.

Alternative 1 (Rejected)

The 'No-Go' Alternative entails no expansion of the existing CWA 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 taking place. This means that the 'status quo' is maintained, *i.e.*, the current aviation activity at the airport consisting of flight school operations and other unscheduled general aviation flights will continue.

The Alternative 1 ('No-go' Alternative) was rejected, since it will mean that the site will not be able to fulfil its identified strategic roles within the City of Cape Town's air travel market in terms of the following:

- The City of Cape Town's second commercial airport offering scheduled airline services for domestic and international passenger and cargo operations;
- Alternate Airport for diversion and fuel planning purposes, enabling significant efficiencies for the airline sector;
- General Aviation Airport for domestic and international, unscheduled, and private operations;
- Reliever Airport, adding redundancy and diversion capability for aircraft in the region;
- Logistics Hub catalysing multi-modal commercial activity in the region and stimulating economic growth; and
- Commercial Property Developments stimulated and enabled by the above.

Alternative 2 (Preferred and Herewith Authorised)

Alternative 2 entails the expansion of the existing CWA, comprising of the development of five precincts, one of which will be the Agricultural Precinct. The remaining four precincts, *namely*; the Services Precinct, the Airside Precinct, the Terminal Precinct, and the General Aviation Precinct, will be developed in two distinct phases. After the implementation of Phase 1 stipulated below, Phase 2 will evolve in response to market demand.

Phase 1:

- An Agricultural Precinct, measuring approximately 462ha in extent, comprises the continuation of the existing agricultural component. This Precinct includes the construction of the following:
 - existing main access roads and internal farm roads left unchanged;
 - areas of intact vegetation respected as 'no-go' areas for conservation;
 - establishment of the required firebreaks;
 - establishment of wetland rehabilitation;
 - establishment of designated wetland offset areas;
 - construction and installation of associated stormwater infrastructure; and
 - fence line on the outer perimeter and a shared security fence line with the Airside precinct.
- A Services Precinct, measuring approximately 65ha, which will include the construction of the following:
 - a maintenance repairs and operational hanger;
 - an aircraft sanitary station;
 - an airport maintenance facility/area;
 - a catering building;
 - a Ground Support Equipment ("GSE") staging and maintenance facility;
 - a Fuel farm;
 - a cargo terminal;
 - an Aircraft Rescue and Firefighting facility;
 - an Operations Centre ("OPS");
 - an Air Traffic Control centre;
 - an Eskom incoming and Substations;
 - a groundwater and potable water treatment facility and storage area;
 - a water pump station;
 - a non-potable treatment facility and storage area;
 - a solid waste area;
 - a firefighting water pump station;
 - areas for airport use; and
 - internal road and services configuration.
- An Airside Precinct, measuring approximately 249ha, which will include the construction of the following:
 - a primary runway of measuring approximately 3.5km in length at an orientation of approximately 01-19 and taxi ways;

- Solar Photovoltaics ("PV") ;
 - airport parking;
 - a maintenance repairs and operations apron;
 - a cargo apron;
 - an Eskom incoming and substation;
 - a Remote Digital Control Tower System;
 - Localizer, Glidepath antennae, and Precision Approach Path Indicator ("PAPI");
 - Runway End Safety Areas ("RESA") areas around the runway and taxi lanes;
 - Landscaping;
 - firebreaks;
 - establishment of conservation areas;
 - establishment of re-vegetated areas; and
 - internal road and services configuration.
- A Terminal Precinct, measuring approximately 57ha, which will include the construction of the following:
 - landscaping;
 - a passenger terminal building;
 - a car rental and public transport;
 - parking, pick up and drop off area
 - GSE staging;
 - cargo;
 - an energy centre and aircraft sanitary station;
 - a land side substation ("LSS");
 - a hotel;
 - various areas for airport use;
 - aero vintage;
 - restaurants;
 - a petrol and diesel service station;
 - access roads, internal roads and associated infrastructure; and
 - Internal road and services configuration.
- A General Aviation Precinct, measuring approximately 50ha, which will include the construction of the following:
 - a General Aviation/VIP/Government terminal;
 - parking
 - fixed base operators
 - General Aviation hangars
 - a General Aviation Clubhouse and fueling facility;
 - a special cargo facility;
 - an OPS (Operations Centre);
 - access control areas;
 - areas for airport use;
 - a heliport;
 - internal road and services configuration; and
 - signage and billboards.
- Associated infrastructure and components which will include the construction of the following:
 - a sewage pipeline leading to the Fisantekraal Waste Water Treatment Works ("WWTW");
 - a potable waterline;
 - on-site stormwater infrastructure;
 - an Eskom line;
 - access roads and alignment;
 - Solar PV (on buildings);
 - perimeter fencing; and
 - firebreaks.

Phase 2:

- Continued use of the abovementioned Agricultural Precinct, comprising of the following:
 - areas of intact vegetation for conservation purposes;
 - firebreaks;
 - wetland rehabilitation;
 - wetland offset;
 - existing agricultural areas remaining intact;
 - existing access roads remaining;
 - stormwater infrastructure;
 - a fence line; and
 - a shared security fence line with the Airside precinct.
- Continued use of the abovementioned Services Precinct, which will include the construction of the following:
 - groundwater containment and treatment measures;
 - sewage containment and treatment;
 - containment of treated sewage water (inclusive of emergency storage) and pumpstation;
 - a solid waste area
 - a biodigester (using grass feedstock and treated sewage water);
 - Eskom incoming and LS substation;
 - a firefighting water pump station
 - an Aircraft sanitary station;
 - maintenance, repair, and overhaul ("MRO") hangar;
 - a maintenance area;
 - a parking area;
 - a catering building;
 - GSE maintenance and staging area;
 - a fuel farm and underground fuel line
 - a substation
 - a cargo terminal;
 - Aircraft Rescue and Fire Fighting ("ARFF");
 - an OPS (Operations Centre);
 - an Air Traffic Control Tower
 - an Existing quarry to be used for stormwater retention;
 - internal road and services configuration; and
 - landscaping.
- Continued use of the abovementioned Airside Precinct, which will include the construction of the following:
 - a 3.5km long runway;
 - taxi areas;
 - solar PV;
 - aircraft parking;
 - an MRO apron;
 - a cargo apron;
 - Eskom incoming and substations;
 - a Remote Digital Control Tower System ("RDTS")
 - a PAPI;
 - internal road and services configuration;
 - an underground fuel line;
 - RESA areas around the runway and taxi lanes
 - landscaping;
 - firebreaks;
 - conservation areas; and
 - re-vegetated areas.
- Continued use of the abovementioned Terminal Precinct, which will include the construction of the following:
 - landscaping;

- a passenger terminal building;
 - a car rental and public transport facility;
 - a parking, pick up and drop off facility;
 - pier expansion reservation;
 - a terminal reserve;
 - GSE staging area;
 - Cargo area;
 - an energy centre and aircraft sanitary station;
 - an LS SS (Land Side Substation);
 - two (2) hotels;
 - airport use area;
 - aero vintage;
 - restaurants
 - a service station; and
 - internal road and services configuration.
- Continued use of the abovementioned General Aviation Precinct, which will include the construction of the following:
 - General Aviation/VIP/Government Terminal;
 - parking;
 - fixed base operators;
 - General Aviation Hangers;
 - General Aviation clubhouse and fueling;
 - a special cargo facility;
 - an OPS (Operations Centre);
 - an access control facility;
 - transport use area;
 - airport use, i.e., associated buildings and facilities and uses supplementary to the runway use;
 - heliport;
 - internal road and services configuration; and
 - landscaping.

The total development footprint amounts to approximately 883ha in extent.

It was confirmed in the final EIA Report (dated July 2025) that Alternative 2 (Preferred and Herewith Authorised) has been revised to include additional components based on comments received from I&APs and Organs of State. The additional components include, (1) the extension of the fuel line into the General Aviation Precinct, (2) the amendment to the boundaries of the Internal Precinct, (3) the provision of three (3) boreholes, (4) the addition of an incoming potable line, and (5) the omission of the short cross-runway initially proposed.

Technology Alternative related to Energy – Solar and Biodigester versus Eskom Supply

The Biodigester Plant comprises of the feed stream using treated effluent from the new WWTW, cultivated biomass/energy crop as well as organic waste from the site. The system will be designed to provide approximately 1 Mega Watt ("MW") of continuous power.

The Solar PV installation will generate more than 20MW but less than 100MW of renewable energy. The Solar PV installed power sources will be integrated onto the site micro-grid electrical infrastructure using the planned medium voltage distribution network.

Bulk electrical supply will be connected to the Eskom Grid via a 66,000-Volt overhead powerline to be undertaken in a phased approach.

The Eskom power supply will provide backup supply on site to the solar/biodigester energy supply, which is the preferred technology alternative and approach, since the use of a Biodigester Plant and Solar PV installation will reduce reliance on Eskom power supply.

Technology Alternative related to Waste Management – Disposal to landfill versus Biodigester

Waste generated from on-site operations will include general and recyclable waste, which will be separated at source. Recyclable waste will be disposed to a local transfer station or by pickup from licensed waste operators.

General and hazardous waste will be disposed to landfill with transfer by road. Waste will be stored on site for a short period before collection and disposal to landfill.

Technology Alternative related to wastewater treatment and management – on site treatment versus disposal into the CoCT sewer network

Various options were considered, including installation of a pumpstation and associated rising main that conveys the flows directly to Fisantekraal WWTW or the construction of an on-site wastewater treatment plant.

The preferred Technology Alternative entails the construction of an on-site package treatment plant to treat wastewater for non-potable water use on the site. The remaining sewage will be directed to the nearby municipal WWTW for further treatment and disposal.

This is the preferred Technology Alternative, since it aims to optimise effluent reuse, reduce pressure on the WWTW, as well as address environmental concerns with respect to excess treated effluent generated.

3. Impact Assessment and Mitigation Measures

3.1 Need and Desirability

The site is located approximately 40km from the City of Cape Town's Central Business District with linkages to areas located within the neighbouring Municipalities, *i.e.*, Drakenstein Municipality, (Wellington and Paarl), Swartland Municipality (Malmesbury), and Stellenbosch Municipality. The site is therefore well positioned, since it enables future connectivity and new tourism nodes within the broader region. The newly expanded CWA is projected to be 'multifaceted' in that it will provide a number of services within the aviation sector and stimulate associated spinoff industries.

Services within the aviation sector that will be provided include the following:

- Scheduled Airline Services for domestic and international passenger- and cargo operations;
- General Aviation for domestic and international, unscheduled, and private operations;
- Alternate Airport for fuel planning purposes and environmental savings;
- Reliever Airport, adding redundancy and diversion capability for aircraft in the region;
- Logistics Hub catalysing multi-modal commercial activity in the region and stimulating economic growth; and
- Commercial Property Developments stimulated and enabled by the above.

Beneficial spinoffs include the provision of employment opportunities during both the construction- and operational phases. Associated industries and commercial activities that will be stimulated by the development proposal include, *inter alia*, fixed based operations, private charter, recreational flying, flight training, helicopter, fire and rescue, aircraft MRO, aircraft assembly and manufacture, hotel, conferencing and events, retail, food and beverage, warehousing, logistics and freight.

The site's location will help enable the newly expanded CWA to serve as a multi-modal transport hub due to road, rail, and air connectivity, with the aims of fulfilling several key roles within the aviation sector. These include unlocking new markets whilst enhancing existing ones, and creating further opportunities within the sector, thereby improving the

socio-economic landscape within the region. The expansion of existing CWA into a commercial airport will ultimately assist Cape Town to become a 'Multi-Airport City', enabling new growth opportunities and improving the attractiveness and competitiveness of the region.

The close proximity and connectivity of the site to existing road- and rail networks will allow the expanded CWA to form a synergy between air, road, and rail networks and thereby support a multi-modal approach to transportation. This demonstrates the desirability of the development proposal from a transportation perspective.

The timing of having the existing CWA expanded is adequate in the sense that it will lead to meaningful contribution to the region's economy and accelerate economic growth, attract investment, boost tourism, and improve logistics in the short- and long term. Having a second airport offers a competitive edge, whereby diversified aviation infrastructure caters to multiple aviation needs whilst helping to alleviate capacity constraints and mitigate risks associated with flight diversions and delays that may be experienced by the existing CTIA. Expanding the existing CWA is more time-efficient and cost-effective than building a new airport.

Due to the location of the site, nearby communities such as Fisantekraal and Klipheuwel, which house large numbers of previously disadvantaged persons, will benefit from improved access to an increased diversity of job opportunities and skills acquisition during the construction- and operational phases, thereby reducing their spatial dislocation on the outskirts of the city.

3.2 Regional and Local Planning

The existing airport site, previously known as Fisantekraal Airfield, is zoned Transport I with consent for an airport. The extent of the expanded CWA that falls outside of the existing airport site is zoned Agriculture. The relevant planning approval will be required to appropriately rezone the site in terms of the relevant planning legislation in order to permit the development proposal.

The expanded CWA site is currently zoned, as follows:

Property	Zoning
Portion 10 of the Farm No. 724, Fisantekraal	Transport Zoning I with consent for "Airport"
Remaining Extent of the Farm No. 724, Fisantekraal	Agriculture
Portion 23 of the Farm No. 724, Fisantekraal	Agriculture
Portion 7 of the Farm No. 942, Fisantekraal	Agriculture
Remaining Extent of the Farm No. 474, Fisantekraal	Agriculture
Portion 3 of the Farm No. 474, Fisantekraal	Agriculture
Portion 4 of the Farm No. 474, Fisantekraal	Transport Zoning I with consent for "Airport"

Specific land parcels will retain their designated 'Agriculture' zoning, including its associated farming activities. These land parcels comprise of the Agricultural Precinct, reflected in Annexure 2 above.

The site falls partially outside of the City of Cape Town's Proclaimed Urban Development Edge. In this regard, it could be argued that this is due to the nature and scale of this type of land use, which requires large expanses of land that is usually situated in rural areas or near the outskirts of a city with the least impact on existing urban land uses. This approach is consistent with the Western Cape Land Use Planning Guidelines - Rural Areas (2019), which states that bulk infrastructure installations serve both urban- and rural communities. In the airport context, airports are often located outside existing Urban Areas because of their need for extensive space, unique locational requirements, or potential negative impact on surrounding areas. In this sense, the approach to infrastructure installations in rural areas is to ensure that these essential public installations can function effectively in suitable rural locations.

Since the development proposal represents a private investment to establish a new economic and transport hub, it will contribute to creating and attracting investment that will facilitate economic growth and employment opportunities. The development proposal is therefore broadly consistent with specific spatial strategies, as included in the City of Cape Town's Spatial Development Framework, 2023 ("Municipal SDF"). Deviations from the Municipal SDF are required for, *inter alia*, (a) the proposed runway, the runway safety area and parts of the landside development extending beyond the Urban Development Edge, (b) portions of the site located in 'Areas of Agricultural Significance' and 'Discouraged Growth Areas', and (c) the southeastern portion of site that is located within a designated 'Core Biodiversity Area'. The application to deviate from the Municipal SDF will form part of the landuse application. Further site-specific circumstances for deviation from the Municipal SDF will have to be motivated in terms of the Municipal Planning By-law. The expanded CWA will necessitate amendments to the City of Cape Town Northern District Plan, 2023 and Urban Development Edge in order to permit the development proposal.

The expanded CWA is deemed to be consistent with the Western Cape Provincial Spatial Development Framework, 2014 ("Provincial SDF"), since the development proposal will contribute toward leveraging private sector investment for regional infrastructure, strengthen the Cape Metro economy and drive economic growth and employment. Furthermore, the development proposal will promote urban revitalisation by optimising existing assets, and advance spatial efficiency by promoting economic activity both locally and regionally. Given the nature of the development proposal, inter- and intraregional accessibility will be improved by its air connectivity options to the metro and wider areas.

The overarching policy thrust of the Provincial SDF is to ensure that all major infrastructure investments are aligned with developmental objectives that promote economic growth, sustainability, and social- and spatial justice. Within this context, the expansion of the existing airport can be regarded as a strategic enhancement of regional connectivity, positioned to strengthen the metropolitan transport system. By improving access and logistics capacity in a part of the metropolitan nexus experiencing rapid population growth and urban expansion, the development proposal holds potential to unlock new economic opportunities, support more inclusive patterns of growth, and diversify transport options for the region.

Further to relevant provincial considerations, the draft Provincial Land Transport Framework (2024/25–2028/29) explicitly recognises the expanded CWA, as a strategic initiative. In terms of the Greater Cape Metro Regional Spatial Implementation Framework, 2019 the development proposal directly supports the vision and development concept of the said framework by enhancing regional transport infrastructure and logistics networks.

In terms of the City of Cape Town Integrated Development Plan, 2022-2027 ("Municipal IDP"), the development proposal is consistent with the focus areas of the Municipal IDP, since both indirect and direct investment will be made into the City of Cape Town Metropole. Direct employment will be created for the benefit of the communities in the surrounding areas during both the construction- and operational phases. The development proposal will most notably support the transport sector by delivering additional capacity and unrestricted/uninterrupted air access into the region.

The proposed development is consistent with the focus areas of the City of Cape Town's Inclusive Economic Growth Strategy, 2021 given significant positive economic impacts that it will have, as mentioned below:

- Employment;
- Increased route profitability for existing airlines flying into Cape Town;
- Improved business case for future airlines, considering a new route into Cape Town in the future;
- Increased trade opportunities through the provision of additional air cargo capacity;

- Airport redundancy, ensuring air access into- and from Cape Town (unhindered trade and travel);
- Growth in the Gross Geographic Product ("GGP"); and
- Growth in household income.

3.3 Aquatic: Surface Water

The equally modified Mosselbank River is located 1km west of the site, and the Klapmuts River is located approximately 1.1km north-east of the site.

Two seep wetlands are located within the study area, *namely*; seep wetland 1 located within the central portion of the site and seep wetland 2 located approximately 310m east of the site. Both seep wetlands are both heavily modified, fragmented and comprise of little remaining indigenous vegetation. It is, however, still considered important, as breeding and a foraging habitat for various fauna.

The expanded CWA will ultimately result in the loss of approximately 6.74ha of wetland habitat due to the establishment of the runway over seep wetland 1. Furthermore, stormwater released into seep wetland 1 poses a risk to the ecological functioning of the wetland. As a result, wetland offsetting was warranted to compensate for the residual loss of wetland habitat, ensuring no net loss of wetland functionality. The wetland offset will be implemented in accordance with the requirements put forward by the National DWS. The impact on seep wetland 2 is deemed to be negligible due to its distance from the site and the release of stormwater from the proposed development into the stormwater attenuation ponds prior to its release into the surrounding environment.

Three (3) Channelled Valley Bottom ("CVB") wetlands in a seriously modified state were identified east of the site. Two smaller and heavily modified CVB wetlands (CVB wetlands 2 and 3) serving as breeding habitat were identified and do not encroach onto the site. Only a small portion of the larger CVB wetland 1 associated with the unnamed tributary of the Klapmuts River is located on the site, of which approximately 6.74ha of wetland will be lost, as explained above. Another CVB wetland (CVB wetland 4) was identified north of the site. With the exception of the fences, maintenance road and stormwater released into CVB wetland 3, no significant or long-term modifications are anticipated to the CVB wetlands. The development proposal will remain outside of the recommended 15m conservation buffer of the CVB wetland areas. Various artificial features identified in the central portion of the site, includes a quarry associated with historical open-pit clay mining activities, artificial impoundments connected to the CVB wetland 1, stormwater channels and agricultural drains.

The development proposal was found to pose a 'Low' risk significance to CVB wetlands 2 and 3, which is considered to be acceptable. The construction and operation of the expanded CWA will, however, pose a 'Moderate' risk significance to seep wetland 1 due to the anticipated 6.74ha wetland habitat loss. In addition to the required wetland offset, key control measures that include, *inter alia*, avoiding directly impacting the seep wetlands and the maintenance of a 15m wide construction conservation buffer measured from the wetland edge, must be implemented.

Construction- and operation activities that may impact the abovementioned aquatic systems include, (a) modification of the seep wetland 1, hydrological functioning of CVB wetlands 2 and 3, and water quality, (b) alteration of the geomorphological processes (sediment balance, erosion and sedimentation), and (c) wetland habitat loss, altered wetland habitat and impacts to biota. The impact of construction- and operation activities on aquatic systems will be of 'Moderate', 'Low' and 'Very Low' negative significance with the implementation of mitigation measures contained in the EMP and aquatic specialist recommendations made conditional to this Environmental Authorisation. The loss of or alteration to wetland habitat and the impacts to biota were assessed to be of 'Moderate' significance with the implementation of mitigation measures contained in the EMP and aquatic specialist recommendations made conditional to this Environmental

Authorisation. For this reason, it will be imperative that the abovementioned wetland offset be implemented in accordance with the specifications of the National DWS.

According to the Freshwater Ecological Assessment Report (dated September 2024 and compiled by FEN Consulting), the Preferred Alternative is considered acceptable from a freshwater ecosystem management perspective, with the implementation of control/mitigation measures (also included in the EMPr).

An application to obtain a Water Use Licence in terms of the National Water Act, 1998 (Act No. 36 of 1998) was submitted to the National DWS.

Further to the above, the Maintenance Management Plan submitted together with the final EIA Report contains provisions that will ensure infrastructure is maintained in a manner that protects the integrity of the local aquatic system.

3.4 Hydropedology Impacts

Earthmoving activities (excavation) could potentially intercept subsurface flows and affect watercourse recharge. To assess the hydropedology impact of earthmoving activities for the expanded CWA, conceptual models were developed to analyse the flow paths of water and how earthmoving activities might disrupt flow paths in the landscape and affect recharge mechanisms.

Potential impacts during the construction phase include, *inter alia*, the altered natural flow of water, reduced infiltration, disruption of wetland recharge mechanisms and altered recharge of natural streams. Using various methodologies, including hydrological modeling, it was determined that at the basin scale, landscape unit and hydrological response unit scale, no major changes in hydropedological processes are predicted.

During the operational phase, the hydropedological processes are anticipated to remain largely unmodified, and the functionality of the wetlands identified within the catchment area will likely remain unchanged if stormwater is managed effectively in terms of the approved Stormwater Management Plan.

Whilst the overall hydropedological impacts were deemed to be minimal, measures which form part of the EMPr will be implemented to provide additional mitigation, which includes *inter alia*, the implementation of erosion control measures (specifically to limit loss of soil and sedimentation), restricting the development footprint areas to the demarcated areas, and discharging water from clean water diversion structures into the adjacent wetland features in an attenuated manner.

3.5 Aquatic: Groundwater

The local aquifer is classified, as 'fractured' with potential borehole yields. The groundwater quality ranges from 'ideal' to 'poor'. Users are currently extracting groundwater from the fractured aquifer. A large geological structure, *i.e.*, the Colenso Fault, is mapped on the northeastern boundary of the site. This area is required to be treated as a 'no-go' area for high risk activities during the lifecycle of the expanded CWA.

The site has a 'Low' to 'Low/Medium' vulnerability classification. Susceptibility of the aquifer to contamination from anthropogenic activities was considered to be 'Low' to 'Medium', which is attributed to the clay content of the Malmesbury Group. The clay found underlying the site, therefore provides some degree of protection to the underlying fractured rock aquifer. The aquifer vulnerability nonetheless increases to the north-east and will therefore be considered as a 'no-go' area. This requirement forms part of the provisions of the EMPr.

Several sources of contamination from the construction and operation of airports exist, *namely*; surface runoff, leaks from fuel storage and distribution, atmospheric deposition, direct release, and accidental contamination. Additionally, the proposed on-site waste

water treatment plant is considered to be a potential source of pollution. However, the concerns received about digestate from biodigesters potentially leading to nutrient pollution warranted the redesign of the wastewater treatment plant such that the feed stream will comprise of treated effluent from the on-site WWTW and cultivated biomass/energy crop. With the implementation of all required mitigation or measures for avoidance, the impact can be reduced to 'Low' and 'Very Low' negative significance. The required mitigation or measures for avoidance requires the implementation of necessary levels of protection and monitoring as well as the adherence to applicable standards regarding installations for the storage of dangerous goods.

Since groundwater will be abstracted, impacts relate to over-abstraction from boreholes leading to a reduction in regional groundwater levels. Groundwater abstraction volumes must be monitored, which includes having to cease abstraction when low groundwater levels persists and until such time that groundwater levels have recovered. This will extend to monitoring of groundwater for poor quality due to exposure and oxidation of minerals and having to cease abstraction until water quality of the boreholes recover.

The cumulative groundwater impacts will range from 'Medium' to 'Very Low' significance, with the implementation of mitigation measures contained in the EMPr.

3.6 Botanical Impacts

The site comprises of a few vegetation types specified according to the categories that have been mapped in the City of Cape Town's Biodiversity Network (2024), and includes land demarcated, as Critically Biodiversity Area ("CBA") 1a: selected irreplaceable high or medium condition site and CBA1c: selected irreplaceable low condition site.

The most northern portion of the site comprises of a remaining patch of Swartland Silcrete Renosterveld vegetation. According to the Plant Species Impact Assessment Report (dated 10 February 2025 and compiled by Nick Helme Botanical Surveys), the site has a 'High' to 'Very High' density of woody alien invasive vegetation present. The least disturbed portions of the site are of 'Medium', 'High' and 'Very High' sensitivity with increasingly high levels of indigenous plant diversity. Plant SCC were recorded in areas of 'Medium', 'High' and 'Very High' botanical sensitivity.

The primary construction phase botanical impact is the loss and degradation of the remaining natural and partly natural vegetation, including plant SCC. Since the development proposal will result in the loss of approximately 1.6ha of 'Very High' sensitivity vegetation and approximately 2.7ha of 'Medium' sensitivity vegetation, there will be a 'Medium' to 'High' residual impact for which a biodiversity offset will be implemented. The biodiversity offset compensates for the loss of the aforesaid vegetation. The biodiversity offset will measure a minimum of 89ha in extent and will take place on the Farm Hercules Pilaar No. 1242, Paarl. The biodiversity offset site contains Swartland Renosterveld and remnants with significant concentrations of Critically Endangered and Endangered SCC. Whilst the Biodiversity Offset Report (dated 20 June 2025 and compiled by Mr. M. Botha) calculated that a minimum 77ha terrestrial offset is required, a biodiversity offset area of a minimum 89ha has been proposed. This represents an overcompensation of the extent of land required to offset the on-site terrestrial biodiversity impact that the development proposal will have. As an additional safeguarding measure, the approved EMPr further includes an overarching provision which requires that 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 of Cape Town ownership), should the agreed to biodiversity offset not be implemented, as intended.

Compliance with Conditions 34 to 36 of this Environmental Authorisation will ensure that the biodiversity offset is implemented, as intended.

The main operational phase impacts include a reduction of the 'Low' to 'Moderate' levels of ecological connectivity and associated habitat fragmentation. Brush cutting the airside Open Space Areas to comply with safety Regulations may have further negative impacts on vegetation. Overall, the operational phase botanical impacts will be 'Neutral' to 'Low' negative significance with the implementation of mitigation measures and the biodiversity offset. The overall cumulative ecological impacts at the local scale are likely to be 'Neutral' or even 'Low' positive significance with implementation of mitigation measures, the biodiversity offset, and on-site management of the remaining conservation worthy areas. Mitigation measures include, *inter alia*, the conservation of the 'Very High', 'High' and 'Medium' sensitivity areas that do not fall within the development footprint (treating it as 'no-go' areas), the remaining 'Very High', 'High' and 'Medium' sensitivity botanical areas being protected by means of an ecological buffer area of at least 5m wide or being fenced off entirely, the translocation of SCCs, and a plant search and rescue operation prior to the commencement of earthmoving- or construction activities. The required measures to mitigate the botanical impacts forms part of the provisions of the EMPr and Conditions of this Environmental Authorisation (please refer to Conditions 41 to 41.14).

3.7 Fauna: General

The site has an intermediate to moderately low diversity of mammals, invertebrates, herpetofauna and avifauna. The 'Moderately Low' sensitivity portions of the site make up the largest part of the site used for foraging by most faunal species. Faunal impacts during the construction phase include, *inter alia*, loss of habitat, displacement of species, potential increased mortalities, potential poaching/snaring, and loss of habitat connectivity and movement corridors. During the operational phase, faunal impacts include, *inter alia*, increased mortalities, noise and light pollution negatively affecting fauna.

It should, however, be noted that the site is located within a region that has already been subjected to extensive land transformation and habitat degradation, stemming from agricultural activities, urban/peri-urban development as well as extensive alien plant proliferation. This has resulted in a notable cumulative loss of faunal habitat within the region.

Adhering to the various measures included in the EMPr will contribute to mitigating the identified faunal impacts. In this regard, it is required that construction activities be undertaken in a controlled and confined manner. During the operational phase, it is required that sound environmental management practices be adhered to whilst ensuring that no deliberate acts are permitted that would result in further negative impacts, e.g., the prohibition of hunting, trapping, or setting of snares by personnel.

The site has different broad habitat units viz. Renosterveld Habitat, Freshwater Habitat, Modified Habitat and Artificial Impoundments and Agricultural Drains. With the exception of small isolated remnant patches of natural habitat remaining with limited species diversity and faunal abundance, the abovementioned habitats are largely in a modified state. This has resulted in a significant degree of habitat loss for faunal species, and a marked decrease in faunal species diversity and abundance. In light of this and the site's extensive footprint, the Faunal Assessment Report (dated February 2025 and compiled by Scientific Terrestrial Services (Pty) Ltd), confirmed that the development proposal is not expected to result in a significant loss of natural habitat, resources or faunal species diversity. The development proposal was therefore recommended for approval from faunal perspective, provided that faunal mitigation measures included in the EMPr are implemented.

3.8 Fauna: Avifauna

The site does not fall within any Important Bird and Biodiversity Areas ("IBA"). The closest IBA is the Rietvlei Wetland: Table Bay Nature Reserve IBA, located 20km to the west of the study area.

The field observations reported on in terms of the Avifaunal Assessment Report (dated February 2025 and compiled by Scientific Terrestrial Services (Pty) Ltd), revealed that *Grus paradiseus* (Blue crane) particularly favours the on-site cultivated fields, which may be negatively impacted upon due to the newly expanded CWA. Other avifauna observed during field observations include *Phoenicopterus roseus* (Greater Flamingo, NT), *Phoenicopterus minor* (Lesser Flamingo, NT), *Circus ranivorus* (African Marsh Harrier, EN), *Circus maurus* (Black harrier, EN), *Falco biarmicus* (Lanner Falcon, VU), *Sagittarius serpentarius* (Secretarybird, VU), *Aquila verreauxii* (Verreaux's Eagle, VU), *Pelecanus onocrotalus* (Great White Pelican, VU), and *Oxyura maccoa* (Maccoa Duck, NT).

The avifaunal diversity associated with the site is considered 'Moderately Low', mainly consisting of common avifaunal species, with few rare and reclusive birds observed. In terms of food availability, the site is considered to have a 'Moderately Low' abundance of forage for avian species as a result of the historic and existing agricultural activities and severe Alien Invasive Plant proliferation. Transformation by historic and existing agricultural activities has resulted in 'Moderate' habitat integrity. Habitat availability is considered to be patchy and ranges from 'Intermediate' to 'Moderately Low'.

The development proposal will ultimately lead to a reduction in habitat, which may increase resource competition in adjacent habitats due to species displacement. The scale of edge effects that may be experienced may cause further degradation to the surrounding habitat if not appropriately managed. Other impacts include an increase in both air- and road traffic that may increase the possibility of collisions, surface water features that will attract birds and may increase the potential for collisions and loss of/changed avifaunal species habitat, diversity, movement patterns and breeding opportunities. According to the findings of the Avifaunal Assessment Report (dated February 2025 and compiled by Scientific Terrestrial Services (Pty) Ltd), the perceived impact significance to the avifaunal assemblages of the site can be suitably managed provided that mitigation measures are implemented. With mitigation, impacts can be reduced to 'Medium' to 'Very Low' significance levels. The development proposal was therefore recommended for approval, provided that all management and mitigation measures are implemented. Mitigation measures include the requirement for construction activities to take place in a controlled and confined manner. During the operational phase, sound environmental management practices and other measures must be adhered to in order to limit and/or mitigate impacts on avifauna and associated habitat. These mitigation measures have been included in the EMP.

3.9 Poultry Biosecurity and Impacts

Due to the effect of the expanded CWA on the adjacent poultry farms, aspects that could affect the biosecurity of poultry farms and the health of poultry were assessed in the Biosecurity, Poultry Health Study (dated March 2024, with revisions dated January 2025 and compiled by Dr. Deryn Petty).

During the construction phase, dust and elevated noise levels could affect nearby poultry farms. During the operational phase, poor air quality can affect broiler performance and suppress immune function.

According to the Air Quality Impact Assessment Report (dated June 2025 and compiled by DDA Environmental Engineers), it was determined that long-term air quality is unlikely to significantly impact poultry farms. Whilst the on-site WWTW will generate ammonia emissions, the facility will be located too far away from the local poultry farm (County Fair) to be of 'Negative' significance. In terms of noise, the average noise levels show small impacts on the County Fair farm. Based on the contours, there is a minimal average effect of noise on the County Fair farm of 55db. The effect of noise from trucks and cars arriving at- and leaving the expanded CWA can be a significant source of noise, hence careful planning of road layouts and/or traffic calming measures must be considered to mitigate noise impacts (refer to Conditions 45 to 46).

Regarding the impact of vibrations on birds and chickens, it was emphasised that noise from aircraft vibration is intermittent. The walls of poultry houses and the boundary walls around the poultry farm will act as 'dampers' and prevent the resonance frequency from being achieved at the poultry facility.

Although light pollution can disrupt the circadian rhythm, another important consideration is the startling of the birds from headlights shining into poultry sheds at night. In this instance, poultry would respond to being startled by bunching together in a corner away from the stimulus and killing each other by suffocation. Therefore, in terms of the Visual Impact Assessment Report (dated 26 February 2025 and compiled by Filia Visual (Pty) Ltd), the proposed lighting measures will include specific focus on mitigating the impacts of light pollution on the poultry farm in the vicinity of the site. It is required that the Site Development Plan responds to the impact of light pollution by specifying the guidelines to be followed, which must include lighting design concepts that reduces impacts on the surrounds and a lighting audit to be conducted to ensure that all lighting related mitigation measures are adhered to and successfully implemented (refer to Conditions 40 to 40.2.).

Since the newly expanded CWA will accommodate food supplies and trading, the likelihood of the presence of rodents and pests may pose a risk to the neighbouring poultry farms. Hence, the waste handling of the development proposal must incorporate measures to reduce such risks and mitigate any resultant impacts. The Waste Management Plan (dated July 2025 and compiled by PHS Consulting), which incorporates such measures will be implemented (refer to Condition 24). Parallel to this, it should be noted that the use of a biodigester to convert poultry manure and feed waste into methane needs has been amended to the use of grass feedstock and treated sewage water instead. These changes are based on previous concerns raised by I&APs regarding the use of chicken manure on-site and the associated impacts of such practices.

Careful consideration must be given to reduce the likelihood of any new dams attracting wild birds that will increase the risk of spreading contagious diseases to the nearby poultry farm(s).

The Biosecurity, Poultry Health Study concluded that with suitable mitigation measures it should be possible for the said poultry breeder farm and the proposed airport to coexist.

3.10 Agricultural Aspects

The site is located in an area of agricultural significance in terms of the Municipal SDF. The majority of the properties, *i.e.*, Portion 7 of the Farm No. 942, the Remaining extent of the Farm No. 474 and Portion 3 of the Farm No. 474, Fisantekraal, will retain its Agricultural zoning and encompass the Agricultural Precinct. The Agricultural Precinct is therefore the largest Precinct of the expanded CWA with a coverage of approximately 462ha (approximately 53% of the site).

The portion of the runway located within an area of "Agricultural Significance" is considered to have a low impact on existing agricultural activities, since this portion is located within an existing mining servitude of approximately 24.9 hectares.

The site comprises of soils with a strong structure and high clay content, making the soil mostly imperfectly to poorly drained. The strong structure in the subsoil places a restriction on root development. Most of these soils have a sandier topsoil on a clay subsoil that are usually sensitive to erosion if poor management practices are applied.

The site has very limited access to water that can be used for irrigation with most irrigation water being extracted from boreholes. This, coupled with varied rainfall seasons, reduces the site's agricultural potential (especially irrigated agriculture), except for the potential of winter small grain production and livestock farming.

The potential for irrigated agriculture is regarded as 'Very Low'. The potential for winter small grain production is regarded as 'High', depending on the properties of the soil.

Livestock farming potential is reduced by limited grazing during the late summer months, but the potential is regarded as 'Medium-High'. External factors such as security issues and livestock theft, especially for a site located moderately close to the Cape Metropole, can be regarded as a constraint limiting small livestock farming.

The Agro-ecosystem Impact Assessment Report (dated February 2025 and compiled by Agri Informatics) determined that the impact of the loss of 168ha high potential productive land is regarded to be of 'High' significance. Of this 168ha area, only 100ha (60%) is being cultivated (wheat production). This means that there is a negligible reduction of 0.02% of the total national wheat production and 0.03% of the Western Cape's wheat production. It is argued in the said Assessment Report that the impact on food security will be mitigated with the expanded CWA supporting food security through its contribution to access to food, its role in food distribution logistics as well as job creation that will lead to wider food affordability.

The said Assessment Report justified the impact of losing high potential productive land in terms of the perceived importance of the expanded CWA as a key infrastructure node for the Cape Metropole and surrounding districts. The development proposal was therefore supported and recommended for approval.

3.11 Geotechnical Impacts

A regional fault system (the Colenso Fault) is mapped along the northeastern boundary of the site. The said fault system lies within the Agricultural Precinct, and is not deemed to pose a significant constraint to the expanded CWA.

According to the Geotechnical Reconnaissance Investigation Report (dated 31 May 2022 and compiled by GEOSS South Africa (Pty) Ltd), the development proposal can take place from a geotechnical perspective. However, precautionary- and other additional measures are required to be implemented to overcome engineering-geological problems, including, *inter alia*, the conduct of exploratory drilling and follow-up geotechnical investigations, prior to the construction of individual structures.

3.12 Mining Aspects

The existing quarry on Portion 23 of the Farm No. 724, Fisantekraal has an existing Mining Licence. The quarry will be converted into a stormwater retention facility to support the stormwater management of the expanded CWA. Proof of having lodged the required application with the Competent Authority to obtain a mining closure certificate for the quarry was provided.

3.13 Heritage Impacts

According to the Heritage Impact Assessment ("HIA") Report (dated October 2024 and compiled by Aikman Associates Heritage Management), there are no built environment heritage resources of significance. Although two of the structures in the study area are older than sixty (60) years neither of them is of aesthetic significance nor deemed to be conservation worthy. The site is not archaeologically sensitive. It was concluded that the impact on heritage resources will be of 'Low' significance. Additionally, the expanded CWA will have immense sustainable social and economic benefits. The expended CWA was recommended for approval, subject to the implementation of the mitigation measures set out in the Visual Impact Assessment Report (dated 26 February 2025 and compiled by Filia Visual (Pty) Ltd). It was further confirmed in the Archaeological Scoping Report (dated October 2023 and compiled by ACRM), that the expanded CWA will not impact on important 'Stone Age' archaeological heritage resources.

The correspondence from Heritage Western Cape (dated 7 February 2025), indicated that the HIA Report (dated October 2024 and updated on 7 February 2025) meets the provisions of Section 38(3) of the National Heritage Resources Act, 1999 ("NHRA") (Act No. 25 of 1999), and the expanded CWA is therefore endorsed.

The implementation of Conditions 19 and 20 of this Environmental Authorisation will help to ensure the protection of any heritage resources that may be encountered on the site.

3.14 Visual Impacts

The receiving environment (5-10km radius around the site) predominantly comprises of agri-industrial and suburban (and industrial) land uses within the Urban Edge. A number of bulk infrastructure features, including Eskom servitudes containing overhead powerlines, distribution lines, sub-stations and telecommunication infrastructure exist. These features contribute to visual clutter and discordant elements visible in the landscape surrounding the site. Other features include masts of the Goedverwacht Radio Station, the Fisantekraal WWTW, various poultry batteries, the Durbanville Industrial Park, some mining-related land uses and industries. The land uses further away include agriculture, agri-industrial, peri-urban/industrial (concentrated along the Klipheuwel corridor) and urban/residential. The receiving environment therefore has a mixed landscape character and 'Sense of Place'.

According to the Visual Impact Assessment Report (dated 26 February 2025 and compiled by Filia Visual (Pty) Ltd), the 'Zone of Potential Visual Influence' for the development proposal is between 3km and 5km (may increase to 10km at night). The overall development proposal will result in 'Moderate' visual intrusion (with aspects of 'Low' visual intrusion and 'High' visual intrusion). This is due to, *inter alia*, the expanded CWA contrasting moderately with patterns and elements that define the structure of the landscape, and development proposal being partially compatible with land use, settlement and enclosure patterns. The 'High' visual intrusion is attributed to the development proposal being unable to be 'absorbed' into the landscape.

In terms of visibility, the overall development proposal will result in 'Moderate' to 'High' visibility. This is due to the development proposal being visible from more than half of the 'Zone of Potential Visual Influence', views that will partially be obstructed and many viewers that will be affected. In this regard, the sensitivity of visual receptors will vary, depending on their distance from the site.

In terms of compatibility, the overall development proposal demonstrates 'Medium' compatibility relative to the receiving environment, since it will introduce entirely new or unprecedented elements into the landscape. In the same way, the overall development proposal will cumulatively result in an increase in developed land and conditions of urbanity within the Northern District of the City of Cape Town. The possibility, however, exists for positive cumulative visual impacts, if the undeveloped areas of the site are not degraded, and are managed actively to maintain scenic quality. Cumulative visual impacts extend to the visual impacts of lights at night, especially for viewers located within the surrounding landscapes. Little scope for mitigation exists, due to lighting requirements having to meet aviation safety specifications. This implies that negative visual impacts during the operational phase will remain of 'Medium' significance after mitigation, whereas during the construction phase visual impacts will be of 'Low' to 'Very Low' significance after mitigation. An Overall Lighting Report and a lighting proposal must be prepared prior to the commencement of construction activities in order to address aspects of light pollution and the impacts on surrounding areas (refer to Condition 40.1).

The signage and advertising for expanded CWA mounted on the site is required to comply with the relevant municipal requirements and By-Laws.

Mitigation measures must adhere to Urban Design Guidelines, including aspects of fencing, walls, entrances and boundary interfaces, lighting as well as materials and finishes, and Landscape Guidelines. Other mitigation measures that will help to enhance the aesthetics and functioning of the site include, *inter alia*, employing modern aesthetics, developing engaging public areas, implementing innovative roofscapes, having functional colonnades that offers shelter from various elements, having abundant landscaping, incorporate finishes and materials that pay homage to the local context, employing inventive design solutions to elevate the visual and utilitarian facets of buildings,

ensuring that signage is harmonious, adopting other people-centric design elements and adhering to visual buffers zones to limit visual impacts from certain viewpoints in the receiving environment. During the construction phase, good management practices must be implemented to help achieve a 'Low' negative significance rating for visual impacts.

Based on the outcomes of the said Visual Impact Assessment, it was concluded that the expanded CWA can be supported in the context of the EIA application.

3.15 General/Aviation Aspects

The existing airport will be upgraded to a Category 9 Aerodrome licensed with the SACAA. All requirements must be met in order to permit the development proposal on the site. In this regard, it was illustrated during the EIA process that the development proposal complies- or will comply with the following requirements and provisions:

- Compliance with the Civil Aviation Act, 2009 (Act No. 13 of 2009);
- The White Paper on National Civil Aviation Policy, 2017 ("NCAP");
- The National Airports Development Plan, 2015 ("NADP");
- The White Paper on National Transport Policy, 2021 ("NTP");
- The National Transport Master Plan, 2050 ("NATMAP 2050");
- The requirements in terms of the Chicago Convention, 1944; and
- The International Civil Aviation Organization ("ICAO") Regulations.

A total of 24 aerodromes are located within a twenty (20) nautical miles radius of the site. Other civil aviation installations near the site include navigational aids and surveillance equipment. In addition, various Wide Area Multilateration ("WAM") antenna sites are planned in the wider area.

Airspace:

The current airport does not have any designated airspace and falls within the Cape Town Special Rules Area. Therefore, a request will be made to join controlled airspace to acquire an instrument joining clearance from Cape Town Air Traffic Control.

The increase in flight activity for the expanded CWA will affect the flight operations at nearby aerodromes, *namely*; civil aviation aerodromes, AFB Ysterplaat and CTIA. Therefore, to determine safe and efficient ways of operating flights in and out of the site in relation to the existing aerodromes, various studies were commissioned, which is discussed below.

The Airspace and Capacity Study (dated 22 March 2024 and compiled by Straten Consulting Services Limited) addresses certain aspects of airspace in the context of the existing environment as well as existing airports. The study determined that the CWA (FAWN) will be able to operate independently from CTIA (FACT). Any future development plans for FACT are not expected to be an issue. The runway re-alignment will enhance airspace use and further cement the independent operations between the two airports. However, the Airport Task Force that was commissioned by Capewinlands Aero (Pty) Ltd. dealt with specific concerns that will help determine the detailed airspace design requirements. In a similar manner, the requirements in terms of general aviation must be confirmed in consultation with all relevant stakeholders and authorities in the aviation sector. These requirements fall beyond the scope of this Scoping and EIA application process.

The Visualization of FACT and FAWN Combined Operations Report (dated October 2023 and compiled by Royal NLR - Netherlands Aerospace Centre) provides visualization material to display the combined operations between CTIA and the expanded CWA in order to identify conflicts that may arise in terms of the traffic flows between the two airports. The results indicated that in terms of air traffic patterns, no delays or bottlenecks will be experienced, and the virtually 'parallel' routes will contribute to avoiding capacity restrictions at the said airports. No capacity constraints nor conflicts were identified, with the latter being attributed to the parallel approaches/routes to and from the airports.

Additionally, the Civil Aviation Compliance Statement (dated 26 May 2025 and compiled by Royal HaskoningDHV (Pty) Ltd) found that the expanded CWA will impact airspace operations in the area, as well as neighbouring developments. However, the airport must adhere to all prescribed methods and comply with applicable legislation, regulations, standards, and recommended practices. In this manner, the associated impacts must be appropriately mitigated and managed, resulting in a compliant airport with operations that will integrate into the regional and national civil aviation environment.

Obstacle Evaluation:

Annex 14 Obstacle Assessment Report (dated 4 October 2022 and compiled by ATNS) details the assessment of the surveyed obstacles to investigate their influence on existing or future instrument procedures and whether these obstacles will have any effect on the Annex-14 surfaces. An evaluation of the natural- and man-made constructions inside and outside of the site's boundary was conducted to determine the limitations on the distance available for take-off and landing and on the range of meteorological conditions in which take-off and landing can be undertaken. This evaluation was required in order to establish the necessary measures to ensure the safety of aircraft during take-off or landing, or while flying in the vicinity of an airport. These measures will ensure the safety of the passengers and crews aboard them. It was determined that the surveyed obstacles were found not to have any impact on aircraft operations. It is, however, required that all structures and buildings in and around the airport be treated as an obstacle and should be clearly marked and identified (this includes meeting the requirements of day and night markings). The detailed specifications required by the relevant authorities, including the SACAA, with respect to obstacles and its influence on the operations of the expanded CWA must be adhered to.

Concept of Operations:

The integration of the airspace around the expanded CWA with the existing controlled airspace around CTIA to ensure safe, efficient, and harmonious air traffic management whilst accommodating the growing demand for air travel and aviation activities in the region and at the same time adhering to the South African National Airspace Masterplan was considered, as part of the 'Concept of Operations'. In this regard, the surrounding civil aviation sites and small aerodromes, model aircraft sites, the key aerodromes as well as 69 obstacles were identified. This information will be incorporated into the detailed airspace design of the expanded CWA to determine the measures required to ensure safe, efficient, and harmonious air traffic management. These considerations will be applicable when the airspace of the expanded CWA becomes available. According to the Development of an Airspace CONOPS for the Cape Winelands Airport Report (dated 8 October 2024 and compiled by NACO – a company of Royal Haskoning DHV (Pty) Ltd), other technical instruments related to flight procedures will be determined and finalised during the lifecycle of the expanded CWA. Applying for airspace approval is a separate formal process for which the National Airspace Committee ("NASCOM") is the Competent Authority.

Bird Strike

The Bird Strike Risk Assessment Report (dated September 2024 and compiled by Avri Avian Environmental) was specifically commissioned to determine the risk birds pose to aviation safety and is a requirement for obtaining a license from the SACAA. The said Assessment (dated September 2024 and compiled by Avri Avian Environmental) used the ICAO methodology, which includes the consideration of a 13km radius around the site as well as the consideration of the primary- and secondary bird hazard zones where collisions may occur. Further considerations included local bird diversity and land uses that may attract birds. Using the assessment criteria, a subset of bird species was identified that were either frequently recorded and/or having a high hazard/risk level within both the primary- and secondary bird hazard zones. The results showed that the agricultural land use and water bodies within the primary bird hazard zone surrounding the site contributes to the presence

and abundance of high-risk bird species. Hence, various management and mitigation measures must be implemented to address the risk that birds and birds strikes. These measures will form part of the Bird and Wildlife Hazard Management Landscape and Open Space Planning Guideline that must be implemented (refer to Condition 38).

3.16 Defence Aspects

The site is deemed to be of 'Medium' sensitivity due to its proximity to a Military and Defence Site, i.e., the Goedverwacht communications base, located to the southwest of the site. According to the Annex 14 Obstacle Assessment Report (dated 4 October 2022 and compiled by ATNS), the proposed airspace procedures will not interfere with military airspace. Furthermore, it has been determined that there will not be a need for new communication system frequencies, and frequency interference with existing defence installations and radar systems is unlikely. Proof that the South African National Defence Force, the South African Air Force and National Airspace Committee have been consulted during the application process has been provided with the public participation particulars. It was confirmed, as part of the Aviation Specialist Studies in support of the Environmental Impact Assessment at Cape Winelands Airport (dated 23 August 2024 and compiled by Royal HaskoningDHV (Pty) Ltd), that no military/defence-related activities take place at the existing airport.

3.17 Sustainability and Climate change

The Climate Change Impact Assessment Report (dated February 2025 and compiled by Brundtland Consulting (Pty) Ltd), assessed the potential contribution of the expanded CWA to climate change through the production of Greenhouse Gas ("GHG") emissions from its direct and indirect activities, and also considers the impact that climate change could have on the operation, value chain and environment of the expanded CWA. Emissions have been determined up to 2050 to coincide with South Africa's net-zero emissions scenario. The abovementioned Assessment determined the vulnerability of the expanded CWA to the risks of climate change and the associated impacts.

To determine the vulnerability of the expanded CWA to the risks of climate change, a physical risk assessment, inclusive of historical climate data and future climate projections, was undertaken. In terms of physical risks related to the physical impacts of climate change, the identified climate risk that may impact the expanded CWA includes, *inter alia*, wildfires, landslides, water scarcity, extreme heat and flooding. Water scarcity and extreme heat heightened the identified risks. This is attributed to the effect of variable temperatures and weather patterns caused by climate change. Both reactive- and proactive mitigation and adaptation measures that must be implemented have been included in the EMP. These measures will reduce the vulnerability of the expanded CWA to each of the identified climate-related risks. Such measures focus on enhancing the expanded CWA to achieve the goals of water resilience (see Condition 32), water sensitivity, flood-readiness and storm management, managing fire risk and responsiveness, having zero emissions buildings and adopting sustainable waste and energy solutions.

In terms of climate change risk, the carbon footprint of the expanded CWA was defined by considering the GHG emissions of the development proposal. High emissions levels were estimated for the construction phase, which has been attributed to the use of cement, steel, asphalt, and plastics for the development of roads, runways, and stormwater infrastructure, fuel and energy used for the operation of machinery, embedded common construction materials, emissions related to electrical infrastructure and emissions caused by vehicular trips to and from the site.

During the operational phase of the expanded CWA, which is projected to be fully operational in 2050, the total emissions across different scopes (i.e., emissions released directly, indirectly and through value chain emissions) up to the year 2050 are approximately 5.3 million tons of carbon dioxide equivalent, assuming that the proposed renewable energy technologies have been implemented and mitigation was applied to any hard-to-abate emissions.

It was determined that the direct operation of the expanded CWA would have a 'Low-Medium' impact due to the planned sustainability measures to be implemented. The total projected emissions would have a 'Medium' impact on the National Carbon budget due to the significant contribution on account of value chain emissions, including domestic aviation, to the development proposals overall carbon footprint. It is expected that the emissions from domestic aviation will be considered in terms of the Carbon Tax and the mandatory carbon budgets allocation under the Climate Change Act, 2024 (Act No. 22 of 2024). Scope exists to reduce future growth-induced emissions with the establishment of improved Infrastructure. Indirectly, with the expanded CWA being used as an 'alternate' airport, the emissions resulting from diversion could be reduced by 3-5%.

Specific components of the expanded CWA will be responsive to aspects of sustainability and climate change. Building design will, for example, incorporate measures to enable urban cooling and heat responsiveness. The installation of the Solar PV and the biodigester will help to reduce the energy demand from Eskom whilst ensuring that the expanded CWA becomes more self-sufficient through decreased reliance on non-renewable and fossil fuels, as sources of energy. Emission reduction will be achieved by limiting the use of combustion engines and promoting the use of electric vehicles on the site. In terms of adhering to a circular waste economy, a Waste Management Plan will be implemented, which involves waste minimisation at source with for zero waste to landfill, as far as it is possible.

Overall, the expanded CWA will impact climate change from a construction- and operational perspective. The extent of climate change impacts is classified as global, and the duration is defined to be long, since climate change impacts could potentially be reversed. The total impact (including cumulative) is deemed to be of 'Medium' significance.

Whilst the expanded CWA will produce GHG emissions, it offers a socio-economic boost to the region and local economy, including tourism. As a reliever airport, the expanded CWA could improve operational efficiencies for airlines, as explained above. The expanded CWA therefore aligns with national- and global climate goals, whilst ensuring resilience against evolving climate challenges by implementing the planned mitigation and adaptation strategies.

3.18 Noise Impacts

According to the Noise Impact Assessment Report (dated June 2025 and compiled by DDA Environmental Engineers), noise modelling based on current and future projected air traffic simulation figures was used to determine noise impacts, which included the use of stationed monitoring points. Ambient noise measurements were performed in order to establish the existing ambient noise levels in the surrounding areas.

During the construction phase, general construction activities are likely to temporarily increase the local noise level. The typical construction activities causing noise include, *inter alia*, the establishment of the construction camp and site preparation works, initiation of the main civil and electrical works, major civil and electrical works, commissioning of runway 01-19, and the use of construction equipment and vehicles on the site. Certain parameters, including average height of noise sources: 2m, construction operating hours: 24 hr (used as a worst-case scenario), no noise barriers in place and various construction site equipment being on-site, were considered. Based on these determinations, it was found that the noise levels at the closest community receptors are not expected to exceed the SANS Guidelines for Urban Residential Areas during the construction phase. Standard measures form part of the EMPr to mitigate noise during the construction phase, including noise monitoring (refer to Condition 45). Noise impacts during the construction phase is deemed to have a 'Low' significance rating with the implementation of mitigation measures.

During the operational phase, noise from airport operations were simulated with the use of the US FAA's AEDT model with various other factors and parameters considered, including *inter alia*, the operations driven by market time over time, the type of aircraft to be used, the flight times at the airport, and flight paths. The operational noise scenarios modelled, included the following scenarios:

- Scenario 1: Existing operations at full capacity ('No-Go' Alternative);
- Scenario 2: New runway in operational year; and
- Scenario 3: New runway at full capacity.

In terms of Scenario 1, the 60 A-weighted decibels ("dB(A)") zone for the day-night noise rating level is completely contained within the site. The total area affected by noise levels higher than 55dB(A) is 2.47km². A small portion of this noise contour extends beyond the R312 Regional Road towards the south, within the Greenville Garden City residential development. The noise contour above 70dB(A) is 8.6km², and a large portion of this area extends beyond the boundary of the site primarily into the Greenville Garden City residential development and into the Bella Riva residential development.

In terms of Scenario 2, the 55dB(A) noise contour will largely be contained within the site, with the only extension of the noise contour measuring 1.44km² from the site (*i.e.*, no extension of the 55dB(A) noise contour into the residential areas proposed west and south of the site). The 60-65dB(A) noise contour will extend 0.51km², the 65-70dB(A) noise contour will extend 0.15km² and the 70-75dB(A) noise contour will extend 0.03km² with no further noise contours/impacts.

In terms of Scenario 3, the impact zones will extend beyond the boundary of the site. The length of the 55dB(A) impact zone will reach 4km north from the northern site boundary, in a north-north-westerly direction and reach (not overlap) the Klipheuvel residential area. Towards the west, the 55dB(A) contour will reach the Bella Riva residential development.

South of the site, the 55dB(A) noise contour will extend less, reaching a distance of 3.3km, which will overlap with the Greenville Garden City residential development. Immediately south of the runway, the noise levels will be between 60dB(A) and 63dB(A).

In terms of discrete receptors (*i.e.*, sensitive receptors, such as schools and other individual farmhouses around the site), the noise levels calculated indicate that schools identified (*i.e.*, R04, R25 and R27) will be outside of the 50 dBA zone for all three scenarios. The SANS 10103 District guidelines for urban residential areas are only exceeded for (1) one small area on the eastern side of Bella Riva residential development for Scenario 3, (2) an area immediately south of the site for Scenario 1 and Scenario 3 (R21), and (3) a farm house (R28) situated on the eastern side of Klipheuvel, which a receptor situated further away from the site.

The necessary noise mitigation measures have been included in the EMPr and made conditional to this Environmental Authorisation (refer to Conditions 45 to 46). The provisions of the EMPr require that considerations be given to the implementation of 'passive' mitigation measures, such as noise insulation on existing residential dwellings and noise-sensitive buildings (schools, hospitals, *etc.*). Additionally, noise mitigation measures are particularly required for Scenario 3 and will be finalised when consultations between the relevant stakeholders have taken place (refer to Condition 45.1).

3.19 Air Quality Impacts

Potential health nuisances related to the development proposal include the generation of dust, which will negatively affect air quality during the construction phase. Dust deposition is expected to increase in close proximity to various construction activities (within 300m of the working fence). The extent of this impact is considered to be largely confined to the site. Dust impacts will be of 'Very Low' negative significance without mitigation and 'Insignificant' with the implementation of mitigation measures during the construction phase. The exhaust emissions from trucks and equipment at the site are

expected to marginally increase air pollution concentrations during the construction phase, but this increase in exhaust emissions will largely be confined to the site. The expected impact of exhaust emissions during the construction phase is therefore considered to be 'Insignificant'.

According to the Air Quality Impact Assessment Report (dated June 2025 and compiled by DDA Environmental Engineers), a simulation using the US FAA's AEDT model was used to determine the resulting air pollution levels around the site due to the operation of the expanded CWA, for the following scenarios:

- Scenario 1: Existing runway setup under full utilisation ('No-Go' Alternative);
- Scenario 2: Operations on the new runway 01/19 in the operational year; and
- Scenario 3: Operations on the new runway 01/19 at full capacity.

In terms of Scenario 1, air pollution concentrations were well within respective guidelines with no exceedances observed. However, cognisance was taken of the two residential areas planned to be developed immediately south- and west of the site. Once these communities are established, the sensitivity of the area would be considered moderate, assuming appropriate buffer zones will be established.

In terms of Scenario 2, the air pollutant levels outside the boundary of the site will be very low. The air pollution concentrations during the operation phase of the expanded CWA are expected to be very low at the Fisantekraal community, and the new developments located west and south of the site. Air pollution concentrations during the operational phase of the expanded CWA are therefore within the air quality standards modeled by the US FAA's AEDT. The overall air quality impact for Scenario 2 will be of 'Very Low' significance.

In terms of Scenario 3, the only exceedance in Nitrogen Dioxide ("NO₂") concentrations was in small areas located south and north of the expanded runway. However, the exceedance number per year was only 2 and therefore below the allowable exceedances of 88 per year. In terms of the maximum ground-level Sulfur Dioxide ("SO₂") and PM₁₀ concentrations, both the 1-hour guideline and the maximum annual concentrations were not exceeded. Furthermore, the air pollutant levels at the identified community receptors, including at Fisantekraal and Klipheuwel, were found to be well within the standards modeled by the US FAA's AEDT. The resulting overall impact of Scenario 3, before capacity is reached, is expected to be of 'Low' significance with the implementation of mitigation measures.

The measures required to be implemented to mitigate impacts on air quality during the construction- and operational phases have been included in the EMPr. During the construction phase, mitigation measures focus on dust suppression and measures to control the manner in which construction activities ought to take place. During the operational phase, some of the required mitigation measures include investing in aviation technologies and practices that would ultimately reduce the amount air emissions, and air quality monitoring (refer to Conditions 44 to 44.2.). In addition, continuous air quality monitoring must be conducted.

The expanded CWA will invest in measures that encourage the use of electric vehicles, as opposed to conventional combustion engine-powered vehicles in order to help minimise air pollution caused by vehicular emissions.

To assess the potential cumulative impacts, individual modeling was carried out for County Fair, Clay Industry, the Fisantekraal WWTW and Claytile. The resulting ambient concentrations modelled for these receptors located around the site revealed that the maximum concentrations of all pollutants and time averages are below their respective guidelines in terms of each of the above scenarios.

An Atmospheric Emission Licence ("AEL") in terms of the National Environment Management: Air Quality, 2004 (Act No. 39 of 2004) will be required for the total bulk storage of dangerous goods on the site.

3.20 Pollution Aspects

The risk of pollution on the site can be attributed to operations and leaks from storage, distribution and the general use of chemical substances, cleaning agents, oils and other fuels stored on the site. Practical measures to be implemented to reduce such risks focusses on the implementation of various levels of protection, monitoring and an adherence to relevant industry practices and international airport development guidelines. These measures will ensure that any impacts on groundwater users in the local areas associated with accidental leaks and spillages will be of 'Low' negative significance. These mitigation measures have been included in the EMPr.

3.21 Health Impacts

Based on the predicted 1-hour maximum ground-level concentration contours and the cumulative concentration data, the levels for all air pollutants within the site are not expected to reach the Occupational Exposure Limits ("OEL"). The health of workers will, however, depend on other microenvironment conditions. The applicable Occupational Health and Safety Standards and specific requirements for airport workers must be enforced, as required in terms of the relevant enabling provision(s).

3.22 Hazards and Risks

Fire risk management has been identified as one of the key safety considerations for the site. A Fire Management Plan has therefore been developed for the site to effectively deal with such risks. Additionally, the placement of fire water tanks on the site, the inclusion of fire protection measures in the design of buildings, the provision of response vehicles, and personnel trained in firefighting, will be required. Provisions have been made for fire breaks to be established to prevent veldfires on the site. The required removal of alien vegetation on the site that will be undertaken in terms of the Alien Vegetation Management Plan will decrease the intensity of runaway veldfires.

Since off-site incidents may result due to hazards of some of the fuels to be stored on, produced at, or delivered to the site. The main hazards that would occur with a loss of containment of hazardous components on-site include exposure to thermal radiation from fires and overpressure from explosions. The Major Hazard Installation Study (dated 14 August 2024 and compiled by RISCUM (PTY) LTD) found that the facilities at the expanded airport would be classified as a Low Hazard Establishment Major Hazard Installation, resulting in the risks to the general public being considered. Various measures must, however, be implemented to reduce the likelihood and impact of hazards, if it should occur. These measures, as per the provisions of the EMPr, centers around the need for containment of dangerous and other goods as well as adhering to international best practice and industry standards.

Given the nature of the development proposal and the fact that Solar PV panels will be installed on the site, glaring and the risk of exposure to the Air Traffic Control Tower and associated operation of the expanded CWA exist. In order to eliminate glare, the Solar PV panels proposed in the south-eastern portion of the Services Precinct have been removed. According to the Aviation Glint and Glare Assessment Report (dated 4 March 2025 and compiled by Future Impact (Pty) Ltd), the glint and glare impacts will be of 'Very Low' significance. This is considered acceptable in terms of the United States FAA Regulations. Furthermore, it has been recommended that the development proposal receive authorisation from the SACAA from a glint and glare perspective.

The expanded CWA falls outside the Koeberg Nuclear Protection Zone.

3.23 Competition

Since the expanded CWA will be the second commercial airport within the City of Cape Town, competition exists. In this regard, it was argued that the expanded CWA will complement the existing CTIA by providing an injection of needed capacity during peak hours. The location of the site provides more choice as well as a convenient and safe airport option for travelers. Having a city with two airports will result in improved connectivity, increased capacity, operational efficiency, economic benefits, and a more resilient travel experience for passengers. Furthermore, should any one of the airports face operational issues, the option to make use of the other airport exists.

The demand for direct air services at the expanded CWA was informed by research, data and industry consultations. It was forecasted by the Netherlands Airport Consultants that the expanded CWA will process approximately 5 million passengers per annum by 2050 out of the total 20 million passengers travelling to Cape Town. The expanded CWA is therefore forecast to process approximately 25% market share within 25 years, which equates to an increase of 1% per year.

The function of the expanded CWA as an 'alternate' airport will result in additional benefits, including (a) improving the attractiveness of the city to host major events by providing additional airport capacity, (b) continuity of economic activity (trade and tourism) in the event of an extended closure at the CTIA, (c) offering additional temporary- or permanent capacity during peak periods, and (d) countering redundancy in the event of catastrophic fires, structural failures, fuel or power supply interruptions.

Having a second commercial airport will benefit travelers in instances where flights have to be diverted, since the CTIA and the expanded CWA are located only 25km away from each other within the same City. Travelers will therefore reach their intended destination with minimal disruptions. The expanded CWA may relieve any general aviation constraints experienced by CTIA given the latter's core function as a commercial airport where priority is given to the large volume of scheduled airline traffic. The expanded CWA includes the development of required infrastructure that will permit general aviation.

Precedent was used to illustrate other cities that have more than one airport. These cities include, (a) London (Heathrow and Gatwick Airports), (b) New York City (JFK, LaGuardia, and Newark Airports), and (c) Johannesburg (OR Tambo and Lanseria Airports).

According to the Cape Winelands Alternate Aerodrome Feasibility Study (dated 26 April 2024 and compiled by Munich Airport International GmbH), the expanded CWA fulfills the criteria for being a suitable destination alternate for the CTIA. Criteria used to determine this include Operating Hours Compatibility, Take-Off Performance, Landing Performance, Apron/Taxiway Strength at Maximum Taxi Weight and the ICAO's requirements for Rescue and Fire Fighting Services. The said Study confirmed that based on the analysis of meteorological and weather data over the last twenty (20) years, the expanded CWA is very well suited to serve as a destination alternate or fuel ERA aerodrome.

In light of the above, it was concluded that the expanded CWA will enable economic benefits and complement the CTIA by boosting the viability, economics and feasibility of routes into the said airport. The two airports can therefore co-exist within the City of Cape Town.

3.24 Service Requirements

Wastewater (Effluent) Treatment:

A wastewater treatment plant to treat sewage generated by the development proposal will be established. The treated effluent will be reused on site for irrigation- and biodigester purposes. This will reduce the need to use potable water on the site. The required authorisation in terms of the National Water Act, 1998 (Act No. 36 of 1998) must be obtained from the Competent Authority.

Electricity:

The site currently contains an existing 66 kilovolts Eskom supply, which will be upgraded to support the expanded CWA. According to the correspondence from Eskom (dated 4 March 2025), capacity exists to provide a 5-MVA load. The bulk mains electrical supply will be connected to the Eskom Grid via an overhead 66,000- Volt three cable. Mini-substations will be established around the site, allowing for site-wide distribution. The final load requirements will be achieved over time and be supported with the installation of renewable energy sources, *i.e.*, Solar PV and biodigester, on the site. Biogas production will be continuous and store gas in gas bladders protected by inflated domes.

Provisions will be made for battery energy storage in terms of the Solar PV facility. This will be in the form of containerised outdoor enclosures located close to the PV Power Source(s).

Water:

Potable water will be provided through treated groundwater abstracted from boreholes located on the site and supplemented by the City of Cape Town. According to the Borehole Yield and Quality Testing Report (dated 14 April 2022 and compiled by GEOSS South Africa (Pty) Ltd), groundwater will be treated at a new treatment facility proposed on the site. The National DWS will consider the results contained in the Geohydrological Assessment Report (dated 28 February 2025 and compiled by GEOSS South Africa (Pty) Ltd) that accompanied the groundwater use license / Water Use License Application.

The correspondence from the City of Cape Town (dated 9 July 2025) confirms that there is sufficient infrastructure capacity to support the development proposal. The City of Cape Town's bulk supply system has sufficient water resources, treatment, bulk storage and conveyance capacity to supply the expanded CWA with the estimated average daily demand of 399.0kl/day. The integration of Treated Sewage Effluent ("TSE") from the on-site wastewater treatment plant for all non-potable uses will significantly reduce the burden on potable water resources. The combined potable water supply from the City of Cape Town and the on-site borehole fulfills the projected daily demand for potable water.

Sewage Management and Treatment:

Various options for sewage management and treatment were considered. Ultimately, the preferred option entails sewage discharge to be treated via a dual-treatment approach. Sewage will be diverted through a pump system to a proposed on-site package treatment plant. This plant will treat the sewage to a standard suitable for non-potable water use, such as irrigation or flushing. The remaining sewage will be directed to the nearby Fisantekraal WWTW for further treatment and disposal. The correspondence from the City of Cape Town (dated 13 May 2025) indicated that this approach is feasible and in terms of wastewater treatment requirements, the Fisantekraal WWTW has sufficient unallocated capacity to accommodate additional influent.

The key components to form part of the sewage management and treatment includes, internal sewer network to convey sewage, a lifting station to divert a portion of sewage to a package sewage treatment plant, a primary sewer pump station to direct the remaining sewage to the Fisantekraal WWTW via a pump and rising main, a sludge processing area, an emergency overflow pond and an emergency overflow to the primary sewer pump station from the package treatment plant. The wastewater treatment from the on-site package treatment plant itself is potential source of pollution. In order to limit this, it was decided that instead of using chicken manure as a feedstock, the feed stream will be composed of treated effluent from the WWTW, cultivated biomass / energy crop and organic waste from the site.

Solid Waste Management:

Waste at various stages of construction and operation will be generated. A Waste Management Plan will be implemented to manage the waste generated on-site according to the applicable requirements.

'Waste' from the biodigester plant comprises 'liquid fertilizer', which will be distributed to local farms within a 40km radius of the plant.

A Waste Management Plan, which outlines the waste streams during the construction and operational phases, monitoring requirements, responsibilities associated with waste management on site and potential impacts will be implemented. The Waste Management Plan will further ensure that the requirements, as per the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) are adhered to.

During the construction phase, waste generated will, as far as possible, be re-used and recycled in order to reduce waste to landfill. The need to reduce, reuse and recycle waste forms part of the provisions of the EMP. The same approach will be implemented during the operational phase with respect to the reduce, reuse and recycling waste, as per the relevant provisions of the EMP.

Waste trucks entering and exiting the site will potentially emit foul-smelling odours. In addition, active composting, organic piles emit volatile compounds. Hence, essential measures forms part of this Decision in order to mitigate such impacts (refer to Condition 24). Measures are similarly be implemented to ensure that waste management mitigates dust, noise and visual impacts.

The correspondence from the City of Cape Town (dated 13 May 2025) indicated that sufficient unallocated capacity exists to accept, collect, and dispose of all types of waste to a designated licensed landfill site.

Stormwater Management:

Existing drainage routes and attenuation ponds will be retained and incorporated into the stormwater management system. New stormwater management infrastructure comprises of a stormwater drainage network that is based on a dual stormwater system, consisting of a major and a minor network, conveying stormwater generated on site via pipes and overland flow routes, dry attenuation ponds with engineered layer works and a wet detention pond. In order to address the potential attraction of avifauna to the ponds, all ponds have been designed as dry ponds, except for one, i.e., the rehabilitated quarry, which has a permanent water body. Other options to further mitigate any impacts in this regard include, *inter alia*, covering the exposed water surface area (rehabilitate quarry) and maintaining consistency in planting vegetation on either side of the ponds to discourage bird movement between ponds. Measures will be implemented to ensure all ponds are suitably maintained and appropriately monitored.

The minor stormwater system will include open drains, an underground piped network complete with channels, inlet catchpits, oil separators, manholes and outlet structures. The major stormwater system will comprise of roads and on-site overland flow paths, which will operate in conjunction with the minor system.

The overland flow routes on the site will be designed to safely convey the 1:100-year storm event towards the ponds situated along the boundary of the site. From there, formal overland escape routes, in the form of pond overflows, will be designed to convey peak runoff from the 1:100-year storm, which cannot be handled by the stormwater system before discharging into the adjacent infrastructure.

A Stormwater Management Plan approved by the City of Cape Town must be implemented to adequately manage stormwater and avoid, or if not possible, mitigate the associated stormwater-related impacts (refer to Condition 37).

Fuel requirements:

A new fuel depot with a total storage capacity of approximately 2 000m³ (to ensure 7 days of buffer stock) will be located, as close as possible, to the apron stands and include service roads for road tankers to limit interactions with- and impact on airport traffic. Standard measures to mitigate the associated impacts that will be implemented include, *inter alia*, the use of concrete-bunded areas for secondary containment and double

walled tanks. In addition, a retail fuel service station will be developed with a total storage capacity of approximately 92m³ (petrol and diesel) together with the associated infrastructure.

3.25 Traffic Impacts

The site is well-served by an extensive road network, which connects to both north-south and east-west highways, providing efficient routes to the broader Western Cape. By distributing passenger traffic across two airports, road congestion around the airports would be reduced, making it easier for passengers to reach their flights on time. Future land use projections and approved future planned developments in the immediate surrounds of the site influence future Municipal road network. The expanded CWA will require the amendment of east-west links traversing the site and the links in the north of the site.

The various access opportunities to the road network system that are available include, (a) the existing Melish Road (OP 6/8) connection onto Lichtenberg Road, (b) the future Class 3 Lucullus Road extension, and (c) the future Class 3 Melish Road extension through the Bella Riva residential development. It was determined that option (a) is the most viable, since the other access opportunities will require more co-operation and agreements between relevant and affected landowners. The existing Melish Road (OP 6/8) connection onto Lichtenberg Road will take place in a phased approach. The area east of the new runway will be accessed from Lichtenberg Road (R312 Regional Road).

According to the Transport Impact Assessment Report (dated June 2025 and compiled by Innovative Transport Solutions) to gain specific trip generation rates, cordon counts were conducted around the CTIA. Based on these cordon counts, 136.34 trips per million annual airline passengers were calculated for weekday AM peak hour and 253.64 trips per million annual airline passengers were calculated for weekday PM peak hour.

Taking into consideration the horizon years for the development proposal, it was estimated that by 2032, 601 in total (467 in / 134 out) weekday AM peak hour trips and 1 199 in total (659 in / 540 out) weekday PM peak hour will be generated. By 2050, 1 314 in total weekday AM peak hour: (1 004 in / 310 out) and 228 total (1 151 in / 1 077 out) weekday PM peak hour trips will be generated.

Based on these figures and the existence of multiple access points to the site, it is estimated that single-lane roads with dedicated turning lanes should be able to accommodate the vehicle demand. However, multi-lane roads must be constructed for the main public circulation route for more ideal vehicular flow and planning of road reserves should make allowance for dualling when necessary. As with other airports, it is expected that public transport to- and from the expanded CWA will utilise 'drop-and-go' routes linking with the public transport.

In terms of the internal road requirements and parking, two lanes per direction, includes controlled access points to restricted areas and space for U-turns in front of any controlled access points. The main road circulating adjacent to the terminals and parking areas will include dedicated public transport, e-hailing and passenger vehicle 'stop-and-go' zones. A minimum of 1 705 parking bays will be provided for Phase 1 and the provision of additional parking bays thereafter will be provided in response to increased demand. Parking will be provided in various restricted areas of the expanded CWA, as and when required.

The EMPr contains provisions to mitigate and manage the associated traffic impacts during the construction phase. It is particularly required that deliveries be scheduled outside peak hours to prevent congestion during peak periods. It must at the same time be noted that material will largely be sourced from existing quarries (mostly located west of the site), whilst most of the earthworks will be done on-site to balance cut and fill areas.

Based on the above, the said Assessment Report concluded that the expanded CWA can be approved from a transport point of view.

3.26 Other Aspects

The EMPr contains other standard provisions such most notably best practices to ensure that construction impacts relating to traffic, visual, health and safety, waste and socio-economic impacts are adequately managed and mitigated.

3.27 Socio-economic Impacts

According to the Socio-Economic Impact Assessment Report (dated 30 May 2025 and compiled by Dr. Jonathan Bloom), the most significant socio-economic benefit from the development proposal is the anticipated contribution to the aviation industry in the Western Cape. More specially, an estimated R8,9 billion in capital investment could generate R23,1 billion in new business sales, which could add R8,8 billion (net of the import leakage) to the Gross Geographic Product ("GGP") of the Western Cape economy during the construction phase alone. During an initial 20-year operational period, an estimated R36,1 billion in nominal terms could generate R76,1 billion in new business sales.

The conversion of the land particularly where wheat production takes place is expected to reduce employment from 20 to 12 permanent opportunities. This impact was not deemed significant due to new employment opportunities that expanded CWA will provide and the capital injection into the remainder of the farm during both construction- and operational phases. In this regard, the development proposal could sustain approximately 32 433 (direct, indirect, and induced) employment opportunities during construction, including ongoing capital expenditure upgrades over a twenty (20) year period. This could increase household incomes by R3,8 billion over 22 years. During the initial 20 years operational phase, the development proposal could sustain about 102 732 direct, indirect, and induced employment opportunities, adding R17,7 billion in household income. According to the said Assessment Report, the positive impacts include skills development and training, small business development and capacity building in the local area. In terms of the provisions of the EMPr, benefits of these positive impacts will be aimed at enhancing gender equality through the recruitment processes and appointment of local contractors during the tender process.

During the construction phase, positive impacts includes (a) creating new employment opportunities (as mentioned above) and (b) economic income.

During the construction phase, negative impacts include (a) increased vehicular traffic flows, (b) nuisance factors, such as dust and noise, (c) an influx of job seekers and (d) potential increase in local crime.

During the operational phase, positive impacts include (a) creating new employment opportunities (as mentioned above), (b) economic income, (c) creating new business opportunities, and (d) revenue accruing to local authorities.

During the operational phase, the negative impacts include (a) vehicular traffic flows, (b) nuisance factors, such as dust and noise, (c) potential increase in local crime, (d) risk of new or expanded informal settlements (potential), (e) altered sense of place, (f) impacting nearby farming and business operations (g) affects surrounding land values, and (h) increased demand for bulk infrastructure and servicing.

Whilst potential negative impacts have been identified, the said Assessment Report determined that with proper management and the implementation of all mitigation measures recommended by specialists, the socio-economic impact is deemed to be of 'Low' to 'Moderate' significance. According to the said Assessment Report, the analysis indicates that the socio-economic benefits would outweigh the potential socio-economic costs of the expanded CWA.

The development proposal will result in both negative and positive impacts.

Negative Impacts include the following:

- Temporary nuisance related impacts during the construction phase;
- Loss of and impact on aquatic features;
- Loss of and impact on biodiversity features;
- Impact on faunal species;
- Increased demand for services;
- Increased traffic to and from the site;
- Increased air emissions;
- Increased noise levels;
- Increased lighting in the local area;
- Additional market share in the aviation sector;
- Additional activity in the controlled airspace;
- Conversion of agricultural land;
- Increased anthropogenic activities in and around the site;
- Visual alteration of the site; and
- Alteration of the local 'Sense of Place'.

Positive Impacts include the following:

- Employment opportunities;
- Various socio-economic spinoffs;
- Varied/additional air travel options;
- Infrastructure to support the travel and tourism industry;
- Fiscal contribution towards the local economy;
- Fiscal contribution towards the regional economy; and
- Beneficial activation of a partially fallow site.

4. National Environmental Management Act, 1998 (Act No. 107 of 1998) Principles

The National Environmental Management Principles (set out in Section 2 of the NEMA, which apply to the actions of all Organs of State, serve as guidelines by reference to which any Organ of State must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment), *inter alia*, provides for:

- the effects of decisions on all aspects of the environment to be taken into account;
- the consideration, assessment and evaluation of the social, economic and environmental impacts of activity (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment;
- the co-ordination and harmonisation of policies, legislation and actions relating to the environment;
- the resolving of actual or potential conflicts of interest between Organs of State through conflict resolution procedures; and
- the selection of the best practicable environmental option.

5. Conclusion

In view of the above, the NEMA principles, compliance with the conditions stipulated in this Environmental Authorisation, and compliance with the EMP, the Competent Authority is satisfied that the authorised Listed Activities will not conflict with the general objectives of Integrated Environmental Management stipulated in Chapter 5 of the NEMA and that any potentially detrimental environmental impacts resulting from the undertaking of the Listed Activities can be mitigated to acceptable levels.

-----END-----

Appendix A: The obstacles that must be clearly marked with day- and night markings:

SURFACE	TARGET	OBSTACLE	PENETRATION	LATITUDE	LONGITUDE	ELEVATION
Balked Landing	01	_RWY21 PP5	-15.043	S 33° 45' 32.9882"	E 018° 44' 10.2920"	124.161
Inner transitional	01	_HANGER_A1	-4.492	S 33° 46' 15.2485"	E 018° 44' 29.1453"	133.502
Inner transitional	01	_PP1	-9.011	S 33° 45' 54.6489"	E 018° 44' 22.1157"	126.789
Strip	01-19	_FUEL FARM	-10.055	S 33° 46' 15.8166"	E 018° 44' 31.0346"	130.433
Strip	01-19	_HANGER_2	-5.676	S 33° 46' 13.9655"	E 018° 44' 29.9791"	125.507
Strip	01-19	_HANGER_A1	-13.381	S 33° 46' 15.2485"	E 018° 44' 29.1453"	133.502
Strip	01-19	_MET STATION	-14.495	S 33° 46' 04.8552"	E 018° 44' 23.1048"	131.535
Strip	01-19	_PP1	-12.493	S 33° 45' 54.6489"	E 018° 44' 22.1157"	126.789
Strip	01-19	_PP2	-11.716	S 33° 45' 55.5070"	E 018° 44' 23.9162"	126.341
Strip	01-19	_RWY21 PP2	-12.826	S 33° 45' 34.6972"	E 018° 44' 18.0334"	121.635
Strip	01-19	_RWY21 PP3	-14.229	S 33° 45' 34.0683"	E 018° 44' 15.1213"	122.707
Strip	01-19	_RWY21 PP4	-15.732	S 33° 45' 33.5537"	E 018° 44' 12.8416"	123.945
Strip	01-19	_RWY21 PP5	-16.242	S 33° 45' 32.9882"	E 018° 44' 10.2920"	124.161
Strip	01-19	_RWY21_TREE1	-25.23	S 33° 45' 44.8538"	E 018° 44' 18.5602"	136.744
Strip	01-19	_T64_BLD	-7.88	S 33° 45' 53.9976"	E 018° 44' 22.6102"	122.033
Strip	01-19	_T65_BLD	-7.875	S 33° 45' 51.4390"	E 018° 44' 19.5945"	121.182
Strip	01-19	_TREE_1	-14.034	S 33° 46' 16.9969"	E 018° 44' 32.0501"	134.781
Strip	01-19	_TREE_2	-16.232	S 33° 46' 16.9874"	E 018° 44' 32.1565"	136.983
Strip	01-19	_WINDSOCK MID	-9.089	S 33° 46' 19.7678"	E 018° 44' 25.8315"	130.212
Transitional	01	_HANGER_3	-6.551	S 33° 46' 14.7972"	E 018° 44' 32.4135"	129.829
Transitional	01	_PP3	-10.472	S 33° 45' 55.9201"	E 018° 44' 25.9506"	126.209
Transitional	01	_RWY21 PP1	-4.867	S 33° 45' 35.3422"	E 018° 44' 20.9663"	119.841
Transitional	01	_TANK_2	-0.22	S 33° 46' 13.7969"	E 018° 44' 34.6868"	132.567
Transitional	01	_TREE_3	-8.038	S 33° 46' 17.0056"	E 018° 44' 34.0187"	135.272
Transitional	01	_WATER TANK	-2.685	S 33° 46' 11.0727"	E 018° 44' 32.7418"	130.280
Transitional	01	_HANGER_A4	-4.349	S 33° 46' 12.4504"	E 018° 44' 31.5988"	126.649
Transitional	01	_OFFICE	-5.433	S 33° 46' 11.9595"	E 018° 44' 31.7976"	128.865
Balked Landing	19	_PP1	-1.249	S 33° 45' 54.6489"	E 018° 44' 22.1157"	126.789
Balked Landing	19	_RWY21_TREE1	-21.698	S 33° 45' 44.8538"	E 018° 44' 18.5602"	136.744
TOFPA	19	_W_RESERVOIR	-3.994	S 33° 47' 33.2716"	E 018° 44' 46.1067"	151.944
Transitional	19	_HANGER_3	-6.551	S 33° 46' 14.7972"	E 018° 44' 32.4135"	129.829
Transitional	19	_PP3	-10.472	S 33° 45' 55.9201"	E 018° 44' 25.9506"	126.209
Transitional	19	_RWY21 PP1	-4.867	S 33° 45' 35.3422"	E 018° 44' 20.9663"	119.841
Transitional	19	_TANK_2	-0.22	S 33° 46' 13.7969"	E 018° 44' 34.6868"	132.567
Transitional	19	_TREE_3	-8.038	S 33° 46' 17.0056"	E 018° 44' 34.0187"	135.272

Transitional	19	_WATER TANK	-2.685	S 33° 46' 11.0727"	E 018° 44' 32.7418"	130.280
Transitional	19	_HANGER_A4	-4.349	S 33° 46' 12.4504"	E 018° 44' 31.5988"	126.649
Transitional	19	_OFFICE	-5.433	S 33° 46' 11.9595"	E 018° 44' 31.7976"	128.865
Take-off Climb	14	_RWY32_TREE4	-11.374	S 33° 46' 28.5783"	E 018° 44' 52.6322"	141.078
Take-off Climb	14	_RWY32_TREE5	-4.528	S 33° 46' 28.3862"	E 018° 44' 53.6418"	135.288
Take-off Climb	14	_RWY32_TREE6	-2.914	S 33° 46' 28.0738"	E 018° 44' 55.0798"	135.154
TOFPA	14	_RWY32 F1	-1.487	S 33° 46' 26.0294"	E 018° 44' 49.0623"	126.269
TOFPA	14	_RWY32_TREE2	-15.309	S 33° 46' 28.8997"	E 018° 44' 50.7390"	141.005
TOFPA	14	_RWY32_TREE3	-15.126	S 33° 46' 28.7279"	E 018° 44' 51.7451"	141.078
TOFPA	14	_RWY32_TREE4	-14.901	S 33° 46' 28.5783"	E 018° 44' 52.6322"	141.078
TOFPA	14	_RWY32_TREE5	-8.857	S 33° 46' 28.3862"	E 018° 44' 53.6418"	135.288
TOFPA	14	_RWY32_TREE6	-8.368	S 33° 46' 28.0738"	E 018° 44' 55.0798"	135.154
TOFPA	14	_RWY32_TREE1	-9.958	S 33° 46' 29.1705"	E 018° 44' 49.1117"	135.239
Strip	14-32	_RWY32 F1	-1.679	S 33° 46' 26.0294"	E 018° 44' 49.0623"	126.269
Transitional	14	_TREE_1	-2.608	S 33° 46' 16.9969"	E 018° 44' 32.0501"	134.781
Transitional	14	_TREE_2	-4.519	S 33° 46' 16.9874"	E 018° 44' 32.1565"	136.983
Transitional	14	_WINDSOCK MID	-0.394	S 33° 46' 19.7678"	E 018° 44' 25.8315"	130.212
Approach	32	_RWY32_TREE4	-11.374	S 33° 46' 28.5783"	E 018° 44' 52.6322"	141.078
Approach	32	_RWY32_TREE5	-4.528	S 33° 46' 28.3862"	E 018° 44' 53.6418"	135.288
Approach	32	_RWY32_TREE6	-2.914	S 33° 46' 28.0738"	E 018° 44' 55.0798"	135.154
Transitional	32	_RWY32_TREE2	-9.558	S 33° 46' 28.8997"	E 018° 44' 50.7390"	141.005
Transitional	32	_RWY32_TREE3	-12.119	S 33° 46' 28.7279"	E 018° 44' 51.7451"	141.078
Transitional	32	_TREE_1	-2.608	S 33° 46' 16.9969"	E 018° 44' 32.0501"	134.781
Transitional	32	_TREE_2	-4.519	S 33° 46' 16.9874"	E 018° 44' 32.1565"	136.983
Transitional	32	_WINDSOCK MID	-0.394	S 33° 46' 19.7678"	E 018° 44' 25.8315"	130.212
Inner Horizontal	FAWN	_RWY01_PYLON MID1	-6.241	S 33° 48' 03.3797"	E 018° 45' 25.0766"	145.591
Inner Horizontal	FAWN	_RWY01_PYLON MID2	-10.101	S 33° 48' 03.9818"	E 018° 45' 09.9010"	149.451
Inner Horizontal	FAWN	_RWY01_PYLON MID3	-7.808	S 33° 48' 04.5311"	E 018° 44' 56.6150"	147.158
Inner Horizontal	FAWN	_RWY32_TREE2	-1.655	S 33° 46' 28.8997"	E 018° 44' 50.7390"	141.005
Inner Horizontal	FAWN	_RWY32_TREE3	-1.728	S 33° 46' 28.7279"	E 018° 44' 51.7451"	141.078
Inner Horizontal	FAWN	_RWY32_TREE4	-1.728	S 33° 46' 28.5783"	E 018° 44' 52.6322"	141.078
Inner Horizontal	FAWN	_STEEL TANK	-3.989	S 33° 46' 48.8511"	E 018° 43' 58.7999"	143.339
Inner Horizontal	FAWN	_W_RESEVOIR	-12.594	S 33° 47' 33.2716"	E 018° 44' 46.1067"	151.944
Conical	FAWN	_TRANS_1 TWR	-83.139	S 33° 47' 21.1688"	E 018° 41' 46.3120"	247.647
Conical	FAWN	_TRANS_2 TWR	-87.374	S 33° 47' 14.2176"	E 018° 41' 41.2943"	254.510
Conical	FAWN	_TRANS_3 TWR	-81.581	S 33° 47' 18.4075"	E 018° 41' 32.9621"	260.895

From: <amanda@phsconsulting.co.za>

Date: Thu, 30 Oct 2025 at 10:59

Subject: NOTIFICATION - ENVIRONMENTAL AUTHORISATION GRANTED FOR
PROPOSED EXPANSION OF CAPE WINELANDS AIRPORT (DEA&DP ref:
16/3/3/2/A5/20/2046/24)

To: <amanda@phsconsulting.co.za>

Dear Registered Interested and Affected Party,

Notice is hereby given, in terms of the National Appeal Regulations, 2025, that Environmental Authorisation (EA) was granted and issued on 27 October 2025 by the Western Cape Government, Environmental Affairs and Development Planning (DEA&DP) for the Proposed Expansion of the Existing Cape Winelands Airport on P10 of Farm 724, RE of Farm 724, P23 of Farm 724, P7 of Farm 942, RE of Farm 474, P3 of Farm 474 and P4 of Farm 474, Fisantekraal, Durbanville.

The Environmental Authorisation (EA) is attached to this email and available on our website at download link <https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/>, and a hard copy has been lodged at the Fisantekraal Public Library (021 444 9259). Please refer to the attached letter for more detail on the EA and the appeal process.

Best wishes

Amanda

Amanda Fritz-Whyte

BSc; BSc (Hons) Geology; MSc Water Resource Management

Fellow Member WISA

Lead: Climate Change Division WISA

Member IAIAAsa

Registered Environmental Assessment Practitioner: Number 2019/367 (EAPASA)

Pri.Sci.Nat (118385)

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Company postal address: PO Box 1752, Hermanus, 7200

amanda@phsconsulting.co.za

www.phsconsulting.co.za

Corporate responsibility: www.africanvisionfoundation.co.za

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.

Celine Oates

From: Celine Oates
Sent: Wednesday, November 19, 2025 4:02 PM
To: 'd.cloete@capewinlands.aero'
Cc: 'amanda@phsconsulting.co.za'; Richard Summers; Reception – Richard Summers Inc.; Clarice Arendse; Shreea Maharaj
Subject: RE: APPEAL IN TERMS OF SECTION 43 OF NEMA AGAINST THE ENVIRONMENTAL AUTHORISATION GRANTED FOR THE DEVELOPMENT OF THE CAPE WINELANDS AIRPORT UNDER DEADP REFERENCE NUMBER 16/3/3/2/A5/20/2046/24
Attachments: Morningstar Flyers Association NPC_Resolution of Directors.pdf; RS Inc_CWA Appeal Statement_Morningstar_19.11.2025_Final.pdf; Annexure A_EA.pdf; Annexure B_Notification of EA.pdf; Annexure D_Lord Affidavit.pdf

Dear Applicant

We refer to the above matter and confirm that we act on behalf of the Morningstar Flyers Association NPC.

We hereby notify you of the appeal against the abovementioned environmental authorisation, and attach hereto the following documentation in this regard:

1. A Resolution of Directors of the Morningstar Flyers Association NPC;
2. RS Inc Appeal Statement on behalf of Morningstar Flyers Association NPC dated 19 November 2025; and
3. Annexures A, B and D.

We shall be most grateful if you would confirm receipt hereof.

Kind regards,

Celine Oates
RICHARD SUMMERS INC.
Candidate Attorney



Office +27 21 891 4402

Mobile +27 71 868 8101

Unit 126, Victoria Junction, 57 Prestwich Street, De Waterkant, Cape Town

AFFIDAVIT OF DEREK JOHAN LORD

In support of an appeal lodged in terms of the National Environmental Management Act, 107 of 1998

I, the undersigned,

1. DEREK JOHAN LORD, Identity Number: 5903275036085, hereby declare under oath as follows:

Introduction and Authority

2. I am authorised to depose to this affidavit and **confirm** that the facts contained herein are within my personal knowledge unless otherwise stated or indicated.

3. The Stellenbosch Flying Club ("SFC") and its Flight School (ATO: CAA/1206) are registered Interested and Affected Parties ("I&APs") in relation to the proposed expansion of the Cape Winelands Airport and the Environmental Authorisation ("EA") issued on **27 October 2025**.

4. I am fully mandated by the Stellenbosch Flying Club to act on its behalf in all consultations, engagements and deliberations relating to the Environmental Authorisation, particularly those involving airspace design, IFR routing and General Aviation impacts.

Scope of Mandate

5. My mandate specifically includes participation in all processes and technical engagements concerning:

- 5.1. the design and management of proposed controlled or restricted airspace;
- 5.2. scheduled IFR aircraft routing associated with the proposed development; and
- 5.3. air traffic management planning to mitigate impacts of proposed airspace proclamations on existing General Aviation operations in the affected areas.

Participation in the EIA / EA Processes

6. I participated in all task teams, technical workgroups, workshops and consultative processes convened as part of the Environmental Impact Assessment and Environmental Authorisation processes.

7. During these engagements, significant concern was raised on behalf of the General Aviation community, particularly regarding the adverse effects anticipated from the proposed airspace structures referenced in **Annex 19** of the original submission.

8. Over a period of nearly two years, the applicant facilitated numerous structured engagements, including physical meetings, virtual sessions, and detailed workshops at which the concerns of the General Aviation community were deliberated extensively.

Mitigations Reached Through Consultation

9. These engagements resulted in several **mutually acceptable mitigation measures**, developed collaboratively and accepted in principle by the applicant and the participating I&APs.

10. These mitigations addressed operational safety, equitable airspace access, routing deconfliction, and the preservation of long-standing General Aviation corridors and training activities.

F10 

Omission of Mitigations from the Final EA

11. Despite the detailed and protracted consultative process, and despite the applicant's acknowledgement of agreed measures, the Environmental Authorisation issued on **27 October 2025** contains **no recorded reference to these mitigation measures**.

12. The omission of these agreed-upon mitigations from the final EA constitutes a material deviation from the consultation record and directly affects the rights, safety, and operational viability of the General Aviation community.

Purpose of This Affidavit

13. The purpose of this affidavit is to formally record the consultative process, the agreed mitigations, and their omission from the Environmental Authorisation, and to support appeals in terms of the National Environmental Management Act, 107 of 1998 lodged by other General Aviation I&AP's.

14. I accordingly submit this affidavit as supporting documentation to the appeal filed against the Environmental Authorisation issued on 27 October 2025.

DEPONENT:



Derek Johan Lord

SIGNED and SWORN to before me at Somerset West on this 17 day of November 2025, the Deponent having acknowledged that he understands and regards the oath to be binding on his conscience.

COMMISSIONER OF OATHS:

06353282

FJ Visser

Name:

Designation:

Address:

Francois Visser

Warrant officer

C.O. main

Pastorius road

Date:

2025.11.17



RESOLUTION OF DIRECTORS OF MORNINGSTAR FLYERS ASSOCIATION NPC

I, the undersigned, GODFREY NEEDHAM, duly authorised Director of Morningstar Flyers Association NPC (Registration Number 2014/267363/08) ("the Company") by General Resolution adopted by the Board of Directors hereby adopt the following resolution in accordance with the provisions of section 74 of the Companies Act 71 of 2008, as amended, and the Memorandum of Incorporation of Morningstar Flyers Association NPC. The Resolution shall be of the same force and effect as if it had been approved by way of voting at a meeting of the Directors of the Organisation duly convened, constituted and held.

1. GENERAL

- 1.1. The Company is assigning authority to Richard Summers Incorporated (Registration No. 2017/536164/21) to appeal in terms of section 43 of the National Environmental Management Act, 1998 (Act No. 107 OF 1998) ("NEMA") against the granting of Environmental Authorisation for the proposed expansion of the existing 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, under Western Cape Department of Environmental Affairs and Development Planning reference number 16/3/3/2/A5/20/2046/24).

2. RESOLUTION

IT IS RESOLVED THAT:

- 2.1. Richard William Summers (Identity Number: 730105 5065 085) of Richard Summers Incorporated be and is hereby authorised, on behalf of Morningstar Flyers Association NPC, to do or cause all such things to be done, to sign all documentation as may be necessary, to give effect to the abovementioned appeal process;
- 2.2. Any actions which have thus far been taken in relation to giving effect to this written resolution be and hereby are retrospectively approved and ratified in their entirety; and
- 2.3. This resolution shall constitute a Resolution in writing for the purposes of the Memorandum of Incorporation of the Company.

GODFREY NEEDHAM

Name:

SIGNED AT CAPE TOWN ON THIS 17 DAY OF NOVEMBER 2025
2025.

APPEAL 4

APPELLANT: RICHARD SUMMERS INC ON BEHLAF OF CAPE TOWN FLIGHT TRAINING CENTRE (PTY) LTD; DIEPKLOOF AIRCRAFT MAINTENANCE CC; 4 AVIATORS (PTY) LTD; HELIVATE HELICOPTER SERVICES (PTY) LTD; AND WCMS CC T/A AEROSPORT.

DATE RECEIVED:
19 NOVEMBER 2025



APPEAL FORM

In terms of the National Appeal Regulations

April 2019

Form Number: 2019

Note that:

1. This appeal must be submitted within **20 days** of being notified of the decision.
 2. This form is current as of **April 2019**. It is the responsibility of the Appellant to ascertain whether subsequent versions of the form have been released by the Appeal Administrator.
 3. This form must be used for appeals submitted in terms of National Appeal Regulations, 2014 in so far as it relates to decisions in terms of the:
 - a. Environment Conservation Act, 1989 (Act No. 73 of 1989);
 - b. National Environmental Management Act, 1998 (Act No. 107 of 1998);
 - c. National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004);
 - d. National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004);
 - e. National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008); and subordinate legislation made in terms of these laws.
 4. The required information must be inserted within the spaces provided in the form. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. The spaces may be expanded where necessary.
 5. Unless protected by law, all information contained in, and attached to this application, will become public information on receipt by the Department.
 6. A digital copy of this form may be obtained from the Department's website at <http://www.capegateway.gov.za/dept/eadp>.
 7. Please consult the National Appeal Regulations (dated 8 December 2014) and the Department's Circular EADP 0028/2014 on the "One Environmental Management System" and the EIA Regulations (dated 9 December 2014), and any other relevant regulations.
-

A. DECISION BEING APPEALED

1. Reference Number of the Decision being appealed:

_____16/3/3/2/A5/20/2046/24_____

2. Type of Decision being appealed (please circle the appropriate option):

Environmental Authorisation	24G Administrative Fine	Amendment of Environmental Authorisation	Amendment of Environmental Management Programme	Waste Management Licence	Atmospheric Emission Licence	Exemption Notice
Permit in terms of NEM: BA	Administrative Notice/ Directive	ECA: OSCA Permit	Other			

3. Brief Description of the Decision:

_____Environmental Authorisation for the Cape Winelands Airport development_____

4. Date of the decision being appealed (i.e. date on which the decision was made):

_____17 October 2025_____

B. APPELLANT'S INFORMATION

5. Please circle the appropriate option

Applicant	State Department / Organ of State	Interested and Affected Party

6. Appellant's information:

Name: Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025

Address:

Tel: _____ Cell: _____

Fax: _____ Email: _____

C. APPEAL INFORMATION

7. Did you lodge an Appeal submission within 20 days of the notification of the decision being sent to you?

Yes / **No** (Circle the appropriate response). If "Yes", attach a copy herewith.

8. The following documents must accompany the appeal submission, kindly indicate if they have been attached to the submission:

- 8.1 a statement setting out the grounds of appeal?;

Yes / **No** (Circle the appropriate response)

- 8.2 supporting documentation which is referred to in the appeal submission?;

Yes / **No** (Circle the appropriate response)

- 8.3 a statement, including supporting documentation, by the appellant that a copy of the appeal was submitted to the applicant, any registered interested and affected party and any organ of state with interest in the matter within 20 days from:

- 8.3.1 the date that the notification of the decision was sent to the registered interested and affected parties by the applicant.

Yes / **No** (Circle the appropriate response).

Please indicate the date on which a copy of the Notice of the decision was sent. 30 October 2025

OR

- 8.3.2 the date that the notification of the decision was sent to the applicant by the competent authority, issuing authority or licensing authority.

Yes / **No** (Circle the appropriate response).

Please indicate the date on which a copy of the Notice of the decision was sent. N/A

D. GROUNDS OF APPEAL

9. Set out the ground/s of your appeal: Clearly list your appeal issues and provide an explanation of why you list each issue.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025_____

- 9.1 Is your appeal based on factors associated with the process that was followed by the applicant/Environmental Assessment Practitioner/Competent Authority in reaching the decision?

Yes / **No** (Circle the appropriate response). Please provide details.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025_____

- 9.2 Is your appeal based on factors associated with matters of unacceptable environmental impacts/extenuating circumstances not taken into account by the Competent Authority?

Yes / **No** (Circle the appropriate response). Please provide details.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025_____

9.3 Have your appeal issues been raised previously in the public participation process?

Yes / **No** (Circle the appropriate response). Please provide details.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025 _____

9.4 Are you fundamentally opposed to the decision (e.g. to any development activity on the site)?

Yes / **No** / **Not applicable** (Circle the appropriate response). Please provide details.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025 _____

9.5 Are you in favour of the decision if your concerns can be remedied by rectifying the process or by mitigating or eliminating an impact/s of the activity/ies?

Yes / **No** / **Not applicable** (Circle the appropriate response). Please provide details.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025 _____

9.6 Please indicate what measures you propose to have your concerns remedied.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025 _____

9.7 Does your appeal contain any new information that was not submitted to the Environmental Assessment Practitioner (EAP) / or registered I&APs/ or the competent authority prior to the decision?

Yes / **No** (Circle the appropriate response). If the answer above is "Yes" please explain what this information is and why it should be considered by the Appeal Authority and why it was not made available to the EAP/ or I&AP/ or the competent authority prior to the decision. (Please ensure that the new information is attached hereto.)

E. SUBMISSION ADDRESS

This appeal must be submitted to the Appeal Administrator at the address listed below within 20 days of being notified of the decision:

By post: Attention: Marius Venter
Western Cape Ministry of Local Government, Environmental Affairs &
Development Planning
Private Bag X9186, Cape Town, 8000; or

By facsimile: (021) 483 4174; or

By hand: Attention: Mr Marius Venter (Tel: 021-483 3721)
Room 809, 8th floor Utilitas Building
1 Dorp Street, Cape Town, 8000; or

By e-mail: DEADP.Appeals@westerncape.gov.za

Note: You are also requested to submit an electronic copy (Microsoft Word format) of the appeal and any supporting documents to the Appeal Administrator.



Appellant's signature

19 November 2025
Date



Western Cape Department of Environmental Affairs and
Development Planning
Environmental Planning and Appeals Coordinator
Attention: Mr. Marius Venter

Our ref.: RWS/RNR21-002
DEADP ref.: 16/3/3/2/A5/20/2046/24

Per email: DEADP.Appeals@westerncape.gov.za

19 November 2025

Dear Sir/Madam

RE: APPEAL IN TERMS OF SECTION 43 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT 107 OF 1998 AGAINST THE GRANTING OF AN ENVIRONMENTAL AUTHORISATION 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

[DEADP Reference: 16/3/3/2/A5/20/2046/24]

INTRODUCTION

1. We, Richard Summers Inc. act on behalf of the following entities, by whom we are duly authorised to note and prosecute this appeal:
 - 1.1. Cape Town Flight Training Centre (Pty) Ltd (Reg. No.2016/471831/07);
 - 1.2. Diepkloof Aircraft Maintenance CC (Reg. No1997/62715/23);
 - 1.3. 4 Aviators (Pty) Ltd (Reg. No. 2017/296100/07);
 - 1.4. Helivate Helicopter Services (Pty) Ltd (Reg. No. 2013/019844/07);
 - 1.5. WCMS CC T/A AeroSport (Reg. No. CK 94/33151/23).

(referred to collectively to as the **Appellants** in this appeal).

2. The Appellants hereby appeals against the decision by the Western Cape Department of Environmental Affairs and Development Planning (**DEADP**) dated 17 October 2025 to grant

Unit 126, Victoria Junction 57 Prestwich Street De Waterkant, 8001 Cape Town	M: +27 (0)82 534 0328 E: richard@summersinc.co.za

CWA Tenants / Cape Winelands Airport / NEMA Appeal

environmental authorisation for the proposed expansion of the Cape Winelands Airport (**CWA**) under DEADP reference number 16/3/3/2/A5/20/2046/24 (**EA**). A copy of the EA is attached hereto as Annexure A. The Appellants were notified of the granting of the EA on 30 October 2025. Proof of notification is attached hereto as Annexure B.

3. The appeal lodged in terms of section 43(1) of the National Environmental Management Act No. 107 of 1998 (**NEMA**), read with Chapter 2 of the National Appeal Regulations, 2025, published under NEMA, within 20 calendar days of the date on which the Appellants were notified of the decision i.e. the appeal is submitted within the statutorily prescribed timeframe referred to in Regulation 4(1)(a) of National Appeal Regulations.
4. The Appellants have complied with the requirement to provide a copy of this appeal to Capewinelands Aero (Pty) Ltd (c/o Mr. Deon Cloete) (**Applicant**) in this matter as set out in Regulation 4(2)(b) of the National Appeal Regulations. Proof of notification to the Applicant is attached hereto as Annexure C.
5. In summary, the grounds of appeal are as follows:
 - 5.1. Ground 1: There is no assessment of socio-economic impacts of the CWA development on the Appellants' operations. The EA was issued on the basis of significant gaps in assessment of socio-economic impacts.
 - 5.2. Ground 2: Due to the failure to identify, evaluate and assess the socio-economic impact of the CWA development on the Appellants, there is an absence of mitigation measures proposed and endorsed as conditions of authorisation to safeguard the Appellants' interests.

BACKGROUND TO THE APPEAL

6. The Appellants are residents of the present-day CWA as tenants, and which residency and continued business operation is critical to the socio-economic sustainability of each of the Appellants' business operations.
7. At the outset, we are instructed to record that the Appellants do not object to the CWA development in principle, and are willing to ensure that their aviation operations co-exist with that of the CWA. We are instructed that the following options have been verbally expressed by the Applicant to be under consideration:
 - 7.1. Option 1: The Appellants remain at CWA throughout the development. In this regard, we note the following:
 - 7.1.1. The construction programme must provide for the creation and maintenance of conditions on the airfield which would facilitate continuous operations other than a brief cut-over period – as has been proposed verbally on a number of occasions by the Appellants. This

option would have minimum impact on the Appellants and is practically possible as demonstrated by hundreds of airfield expansion projects around the world.

7.2. Option 2: The Appellants are temporarily relocated to an existing fully developed airfield. In this regard, we note the following:

7.2.1. Any relocation of an Aviation Training Organisation (**ATO**) will require a minimum of 12 months in order to navigate the regulatory approval process. Pragmatically, this would have to be initiated 24 months in advance of the planned move. Two of the Appellants have first-hand experience of this process (i.e. AeroSport and 4-Aviators). The regulatory procedures applicable to the relocation (inclusive of a notice period and administrative costs) would have to be performed twice in order to re-locate back to CWA after the closure period.

7.2.2. In addition to the notice period and administrative costs, the costs of relocating infrastructure (such as tools, equipment, furnishing etc.) would have to be borne by the Applicant. Staff of the Appellants will also have to be compensated by the Applicant for additional travel and/or relocation expense. Furthermore, Key Efficiency Factors such as good weather record, availability of multiple landing strips, close proximity to flying training areas for basic training and uncontrolled traffic operation would all be compromised resulting in an estimated reduction in turnover of up to 25%.

7.3. Option 3: The Appellants are temporarily relocated to a minor undeveloped brown-field site to the North of the current location for an undisclosed period. In this regard, we are instructed as follows:

7.3.1. The Appellants reject this option on the basis that moving further away physically from the Appellants' base renders the value proposition of their business operations unsustainable. Key Efficiency Factors such as close proximity to market population centre, availability of multiple landing strips and proximity to controlled airspace for advanced and navigational training would be fatally compromised.

7.3.2. In addition to the Appellants' considerations noted under Option 2 above, the Appellants anticipate a reduction of over 60% in turnover. Further issues would include, *inter alia*, additional maintenance costs associated with operating from an unprepared surface. Option 3 and the severe socio-economic impact associated therewith would likely result in the liquidation of a number of the Appellants.

8. Whilst there have been positive interactions between the Applicant and the Appellants to-date, the parties have not reached an agreement regarding the way forward or reduced the options available to writing. This is a concern as certain aspects of the options presented by the Applicant will result in irreversible socio-economic harm on the Appellants' operations.

9. In the absence of a binding agreement between the parties (which offers the Appellants the

requisite level of certainty that their interests are safeguarded), there is potential for and significant risk of serious material adverse socio-economic impacts of the CWA development on the Appellants' operations, which impacts have not been identified, evaluated and assessed as part of the environmental impact assessment process to-date.

10. In light of the above, the Appellants have no alternative but to rely on the internal appeal mechanism in terms of section 43 of NEMA in order to ensure that the Appellants' interests are sufficiently considered and safeguarded going forward.

BACKGROUND TO THE APPELLANTS

11. Cape Town Flight Training Centre (CTFTC):

- 11.1. The CTFTC is a tenant at the existing CWA and is a key aviation training institution producing high-calibre pilots for domestic, regional and international markets at a time when the aviation sector faces its most severe pilot shortage in history.
- 11.2. The business employs around 30 permanent and contract staff, and supports over 200 enrolled students whose tertiary education and career progression rely on continuous training operations. The CTFTC currently holds the necessary capital investment and infrastructure to operate their relevant business operations in place to double its income within 3-5 years.
- 11.3. Over 70 suppliers, including essential aircraft maintenance organisations, depend on CTFTC's ongoing trade which supports their respective businesses. This is an indirect, integral support of the local and national economy.

12. Diepkloof Aircraft Maintenance (Diepkloof Aircraft):

- 12.1. Diepkloof Aircraft has operated as a tenant at the existing CWA for several years, providing essential aviation maintenance services to the wider aviation community and which directly supports flight safety and contribute to the regional aviation economy.
- 12.2. Diepkloof Aircraft employs 13 skilled technicians, each of whom support a household.

13. 4 Aviators (4 Aviators):

- 13.1. 4 Aviators is a South Africa Civil Aviation Association-approved aviation training organisation with a workforce of 68 employees, including 35 flight instructors, 7 administrative staff, 7 engineers, 6 cleaning staff, 11 transport liaison staff as well as additional support roles. 4 Aviators specialises in training international students and operates as a tenant at the existing CWA site.
- 13.2. 4 Aviators has made substantial investments in aircraft parking, approved classrooms,

administrative systems, security infrastructure and signage at the existing CWA, none of which have been accounted for in the environmental impact assessment and associated specialist studies underpinning the EA.

- 13.3. 4 Aviators lease 26 residential premises, housing 260 international students, located in a close vicinity to the CWA. This provides extensive support to the local economy through the provision of accommodation to international flight school students.

14. Helivate Helicopter Services (Pty) Ltd (**Helivate**):

- 14.1. Helivate operates two helicopters at the existing CWA, with over R1 000 000.00 invested in rental of facilities at the present CWA to-date as well as an excess of R350 000.00 in establishment of the business at the present CWA and infrastructure costs. This illustrates the capital investment made in the existing CWA to-date and demonstrates a long-term strategic commitment to the CWA and the region.

- 14.2. Helivate operates a flight school, with students currently in active training programmes.

- 14.3. Helivate directly employs pilots, instructors, ground crew and operations staff, and indirectly supports local suppliers activities such as fuel supply, maintenance, hospitality, transport and tourism partners.

15. WCMS AeroSport Cape Town CC (**AeroSport**):

- 15.1. AeroSport was founded in the mid-1980s and became fully operational as a microlight flying school in 1991. In 1995, the school expanded to include gyrocopter, light sport, private pilot aeroplane and helicopter training.

- 15.2. AeroSport operates Part 61 and Part 62 flying schools, leases six hangars at the existing CWA and trains both local and international students. Many of these students commit to multi-year training plans and extended visa periods.

BACKGROUND TO THE EIA PROCESS

16. Between 24 July 2024 up to and inclusive of 26 August 2024, an in-process Scoping Report was circulated for public comment regarding the expansion of the CWA.

17. On the 12 November 2024, a draft Environmental Impact Assessment Report (**EIAR**) was circulated for public comment from 13 November 2024 up to and inclusive of 13 December 2024. In this regard, references to the CTFTC and AeroSport in the EIAR were restricted to the following:

“There are currently 34 hangars on the site that are in use by various private aircraft owners,

two flight schools (Cape Town Flight Training Centre and Aerosport) and small aircraft operators, such as a crop sprayer and aerial advertising firm. There are no military/defence-related activities taking place at the airport.”¹

18. The above sole mention of the CTFTC and AeroSport is a concession by the Applicant that aviation companies operating from the current CWA will be directly impacted by the development. Notwithstanding this, the mention of CTFTC and AeroSport in passing is a gross underrepresentation of the actual amount of aviation companies that will be directly impacted which should also include – *inter alia* – Helivate, 4 Aviators and Diepkloof Aircraft Maintenance. This is a material non-disclosure that will likely skew (i.e. water down) the identification and assessment of the full range of impacts of the CWA expansion.
19. On the 18 March 2025, a revised draft EIAR was circulated for further consideration and comment. The identification of aviation companies operating from the existing CWA remained limited to the CTFTC and AeroSport only.
20. On 11 July 2025, the final EIAR, Environmental Management Programme and supporting documentation was provided to DEADP as a basis on which to decide whether or not to grant an environmental authorisation in terms of section 24 of NEMA.
21. On the 27 October 2025, the EA was granted to the Applicant for the expansion of the CWA.

GROUND OF APPEAL

Ground 1: Inadequate assessment of the irreparable socio-economic impact of the CWA expansion on the Appellants

22. This ground of appeal demonstrates that the socio-economic impact of the CWA expansion on the Appellants has not been identified, evaluated and assessed as part of the environmental impact assessment process underpinning the EA.
23. The socio-economic sustainability of the Appellants’ operations relies directly on their secure tenure and continued operation at the existing CWA. If the Appellants are not able to operate in their respective capacities, they face the risk of irreparable damage to their business operations and those who rely directly thereon for their livelihoods. Despite this, the full extent of the impacts on the tenants that operate aviation businesses from the existing CWA was not assessed in the environmental impact assessment reports, and supporting specialist assessments (with only two Appellants that were mentioned in the draft, revised draft and final EIAR: CTFTC and AeroSport). This is a material non-disclosure in circumstances in which the Applicant had full knowledge of these business operations since the inception of the CWA development as confirmed by the various discussions held between the Appellants and the Applicant over many years.

¹ Page 319 of the draft EIAR for the Proposed Expansion of the Cape Winelands Airport dated November 2024.

24. The socio-economic impacts generally relevant to the Appellants that were not identified, evaluated or assessed as part of the environmental impact assessment and specialist studies underpinning the EA include:
- 24.1. The socio-economic sustainability of the Appellants is dependent on the continued operation of these entities at the existing CWA. If the Appellants are forced to close (even temporarily) to allow for the CWA expansion, or forced to relocate (even temporarily), the financial stability of these entities and their continued existence as contributors as aviation operators to the local and regional economy is jeopardised by the risk of loss of clients and reduced income.
- 24.2. Those employed by the Appellants and who depend on the Appellants for their livelihoods, as well as the livelihoods of their families, are at risk of employment loss. These include but are not limited to 68 employment opportunities at 4 Aviators, 13 employment opportunities at Diepkloof Aircraft Maintenance, approximately 30 employment opportunities at the CTFTC, 10 employment opportunities at Sky Messaging (5 of which are based permanently at the existing CWA).
- 24.3. The financial contribution of the Appellants to the local economy annually through accommodation, tourism and job creation as a result of national and international flight students attending flight training at the existing CWA is jeopardised by the CWA expansion project. The sustainability of the Appellants' operations is at risk of irreparable harm with the potential shut-down and/or relocation of activities, resulting in the risk of losing these students and their associated financial contribution to the local economy due to the disruption in training. For example, 4 Aviators leases 26 residential premises in close proximity to the existing CWA to house 260 international students.
- 24.4. Should the Appellants be forced to carry the costs of any potential relocation, these costs risk the financial sustainability of the operations to such an extent that the Appellants could face liquidation as a result thereof. These costs include the costs of Change of Base Applications, TPM and manual updates, two inspections and audits, updating immigration and training approvals, consultancy and legal support to ensure the regulatory compliance of the moves, staff reorientation and training, the building or leasing of hangar facilities, the fit-out and furnishing of classrooms and offices, the relocation of accommodation, the set up of utilities, and the ensuring of safety and security which may require upgrades to an acceptable standard. These concerns are backed by past experience that demonstrates the material risk that relocation poses to the Appellants' continued operation and survival, for example:
- 24.4.1. AeroSport's history includes a previous forced relocation to Wintervogel Airfield, which nearly resulted in the collapse of the school due to the severe financial and operational disruption associated with moving an Approved Training Organisation.
- 24.4.2. When the Applicant encouraged AeroSport's return from Wintervogel Airfield, the Applicant

provided repeated verbal assurances that AeroSport would be relocated at the Applicant's cost into new buildings when construction commenced, and that operations would continue uninterrupted on the cross runway throughout the development phase.

24.4.3. Thus far, these assurances have not materialised into a binding agreement that offers the Appellants the requisite certainty that their interests will, in fact, be safeguarded. However, over and above this concern for the purpose of this appeal, none of these socio-economic costs and impacts were identified, evaluated and assessed as part of the environmental assessment process underpinning the EA.

24.5. Notwithstanding the unfeasibility of relocation identified above, no other airfield in the immediate vicinity of the existing CWA will be able to absorb the operations of the Appellants (even on a temporary basis) and provide the Key Efficiency Factors of the existing CWA that currently ensure the success and overall sustainability of the Appellants' operations, such as:

- 24.5.1. Close proximity to the market population centre;
- 24.5.2. Good weather record;
- 24.5.3. Availability of multiple landing strips (4 landing directions);
- 24.5.4. Close proximity to the flying training areas for basic training;
- 24.5.5. Close proximity to controlled airspace for advanced and navigational training; and
- 24.5.6. Uncontrolled traffic operation.

24.6. Flight training businesses are cash intensive, incurring very high fixed costs due to infrastructural and regulatory demands, and suffer from poor variable margins due to the very high fuel, maintenance and capital replacement costs. These already-low margins are further handicapped by currency weakness of the rand and over-regulation in the civil aviation regulatory context. In light of this, the significant disruption likely to take place by the CWA expansion will likely result in the cessation of the Appellants' business operations, the contribution thereof to the local and regional economy, the contribution thereof to the local and international aviation industry, and the multitude of livelihoods directly and indirectly supported by the sustainable business operations. None of this has been accounted for in the environmental impact assessments and specialist studies informing the approval of the EA.

24.7. We are instructed that during the construction phase of the CWA expansion, the airfield will have to be closed for a period of time where flight operations would not be safely possible as the airport moves to its final runway configuration. If properly and sincerely incorporated as an essential element to the construction programme that is sensitive to the Appellants' business operations, this closure could be reduced to a few days. However, since the majority of the Appellants were not identified as part of the environmental impact assessment process / public participation process, and even those who were identified (CTFTC and AeroSport) were only mentioned in passing, none of the impacts on these entities were identified and assessed, and, by implication, no mitigation measures proposed to manage these impacts to an acceptable level through, for example, a well-tailored and sensitive construction

programme.

- 24.8. Approved Maintenance Organisations, such as Diepkloof Aviation at the existing CWA, as well as Stellair at Stellenbosch Airfield, are vital resources to the aviation industry and are in a state of critical decline in South Africa. Stellair is a major contractor to CTFTC.
- 24.9. The flight schools operating from the existing CWA cumulatively spent decades building their national and international reputation within the aviation community as producers of hundreds of high calibre graduates for the benefit of the aviation industry in the domestic, regional and international airline and charter markets. Any disruption to the operation of these school jeopardise this reputation.
25. In light of the above impacts that did not form part of the environmental impact assessment and associated specialist studies that informed the approval of the EA, we confirm the following:
- 25.1. There is no quantitative assessment of the social and economic impacts of the CWA on the sustainability of the Appellants' aviation operations.
- 25.2. There is no objective basis upon which the competent authority is positioned to assess the sustainability of the CWA and to make an informed and rational decision on the need and desirability of the proposal. The assessment and determination of the sustainability, need and desirability of the CWA goes to the heart of the efficiency and effectiveness of the environmental impact assessment as a whole. If significant gaps remain outstanding, such as those identified in this appeal statement, the competent authority is unable to make an informed and rational decision on the sustainability, need and desirability of the CWA as required by the environmental impact assessment regime.
- 25.3. Evaluating the full cost-benefit analysis of the CWA expansion without an objective, independent and comprehensive assessment by an appropriately qualified expert of the social and economic impact of the CWA expansion on the existing aviation operations of the Appellants (that are tenants at the existing CWA) is flawed, and any decision rendered on this basis is irrational and unreasonable.
- 25.4. The lack of a substantive, methodical and credible assessment of the socio-economic impacts of the CWA on surrounding aviation operations is a material deficiency. The final EIAR and specialist assessments underpinning this should be rejected on the basis that the full range of socio-economic impacts of the CWA on existing enterprises operating in the receiving environment have not been identified, considered and assessed as part of the environmental impact assessment process contrary to the prescripts of the following principles in section 2 of NEMA:
- 25.4.1. *"Environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests*

equitably".²

25.4.2. *"Development must be socially, environmentally and economically sustainable"*.³

25.4.3. *"Decisions must take into account the interest, needs and values of all interested and affected parties"*.⁴

25.4.4. *"The social, economic and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed and evaluated, and decisions must be appropriate in the light of such consideration and assessment"*.⁵

26. In light of the above, it is clear that there is no substantive, quantitative socio-economic impact assessment of the effects of the proposed project which reflects the full range of socio-economic consequences of the CWA expansion. The full range of socio-economic impacts of the CWA is a critical pre-requisite to the enquiry as to the sustainability of the development in light of existing aviation operations at the existing CWA. The Constitutional Court in *Fuel Retailers Association v Director General*⁶ (**Fuel Retailers**) case is prescriptive in this regard: *"...the objective of considering the impact of proposed development on existing ones is not to stamp out competition; it is to ensure the economic, social and environmental sustainability of all developments, both proposed and existing ones"*.⁷ The granting of the EA falls woefully short of this threshold established by the Constitutional Court.

27. The Constitutional Court in *Fuel Retailers* also entrenches the inextricable link between socio-economic considerations with environmental considerations in the context of the enquiry into the sustainability of the CWA expansion: *"Economic sustainability is not treated as an independent factor to be evaluated as a discrete element in its own terms. Its significance for NEMA lies in the extent to which it is inter-related with environmental protection... The essence of sustainable development is balanced integration of socio-economic development and environmental priorities and norms"*.⁸

28. The failure to identify, evaluate and assess the implications of the CWA expansion on the existing aviation operations at the existing CWA, its users, and related training and economic activities, demonstrates an inadequate impact assessment in terms of section 24 of NEMA and a disregard for sections 24(1) and 24O(1)(b)(i) of NEMA which states that all relevant factors and impacts must be considered before authorisation is granted. Consequently, the decision to issue the EA was made without full knowledge of all potential material environmental and socio-economic

² Section 2(2) of NEMA.

³ Section 2(3) of NEMA.

⁴ Section 2(4)(g) of NEMA.

⁵ Section 2(4)(i) of NEMA.

⁶ *Fuel Retailers Association of Southern Africa v Director-General: Environmental Management, Department of Agriculture, Conservation and Environment, Mpumalanga Province and Others* 2007 6 SA 4 (CC).

⁷ Paragraph 78.

⁸ Paragraph 113.

impacts. By omitting a detailed assessment of how the CWA expansion will impact on the Appellants, the EA was issued without full knowledge of relevant factors, rendering it procedurally and substantively non-compliant with the requirement that a decision-maker must be presented with the full range of socio-economic and environmental impacts in order to render a rational and reasonable decision.

29. In short, the environmental impact assessment underpinning the EA has failed its most fundamental objective, which is to provide sufficient information to enable informed and credible decision-making and that all potentially significant project impacts are identified and assessed before a decision is taken to approve the CWA expansion. This did not occur and the information the EA was based on is materially deficient. NEMA and the Environmental Impact Assessment Regulations, 2014 as amended, do not include empowering provisions providing for the impacts and mitigation measure to be retrofitted to the approval after an EA is granted. The decision to issue the EA in these circumstances is irrational. It is fundamentally unlawful to ignore the impact mitigation hierarchy.

Ground 2: Absence of Mitigation Measures and Protection for Existing Aviation Activities

30. As a direct result of the Applicant having failed to meaningfully consult the Appellants as part of the environmental impact assessment process, the EA fails to impose binding mitigating conditions of authorisation on the Applicant which serve to avoid, minimise or manage the significant socio-economic impact of the CWA development on the Appellants' operations. The main omission in this regard is that there are no directly relevant conditions of approval or mitigation measures that seek to safeguard the continued sustainable operations of the Appellants' business operations at the existing CWA.
31. It is likely that the CWA expansion may have a devastating impact on the socio-economic sustainability of these aviation operations if these impacts are not adequately assessed and adequate mitigation measures proposed in response thereto and which are made conditions of authorisation. This is notwithstanding the fact that the precise degree of socio-economic impacts on the Appellants is as-yet unknown, due to the Applicant's and EAP's failure to discharge the onus to identify, evaluate and assess the impacts and identify the Appellants and key interested and affected parties.
32. In support of this ground of appeal, we submit the following:
- 32.1. The guarantee of harmful socio-economic impact, and the lack of mitigation measures proposed and incorporated in the EA in response thereto, flies in the face of section 24O(1)(b)(ii) of NEMA which requires the competent authority to ensure that mitigation measures are adequate.
- 32.2. Without the imposition of binding conditions on the Applicant and holder of the EA, all verbal discussions between the Applicant and the Appellants regarding potential options of

safeguarding the Appellants' interests are mere window-dressing, with little to no recourse for those whose operations, activities and livelihoods are impacted negatively by the direct, indirect and cumulative impacts associated with the CWA expansion.

- 32.3. In the circumstances, the critically important aspect of mitigation with respect to the harmful socio-economic impacts of the CWA expansion on the Appellants' operations have been ignored. We submit that the threshold of adequacy cannot be met in these circumstances where the impact assessment and impact mitigation hierarchy have been deferred and, as such, adverse impacts of the CWA expansion have not been avoided, minimised or remedied in contravention of section 2(4)(a)(viii) of NEMA.
33. Without binding conditions that are properly tailored to the project-specific impacts and mitigation measures, there is a material risk that existing aviation operations at the existing CWA could be unduly constrained or rendered inoperable. Such an outcome would result in irreversible socio-economic harm and would be inconsistent with NEMA's sustainability and equity principles, which require that decision-making promotes environmental justice, avoids unfair impacts on affected parties and balances environmental protection with socio-economic needs. This promotes unsustainable development contrary to the tenets thereof outlined in section 24 of the Constitution, NEMA and by the Constitutional Court in *Fuel Retailers*.

CONCLUSION

34. We reiterate that the Appellants do not object to the CWA expansion in principle, and are willing to ensure that their aviation operations co-exist with that of the CWA. However, binding agreements (which offer the Appellants the requisite level of certainty that their interests are safeguarded) have not been concluded and given the potential for and significant risk of serious material adverse socio-economic impacts of the CWA expansion on the Appellants' operations, these impacts have not been identified, evaluated, assessed and integrated into the environmental impact assessment processes to-date.
35. It is vital that the Applicant fully incorporates the knowledge and experience of the Appellants into the construction and operational plans for the CWA expansion, and make express, binding commitments to ensure that these vital components of the region's aviation industry are identified, considered, assessed and safeguarded. The Appellants support a development by the Applicant to develop responsibly without harm and to formally recognise the contribution made by the Appellants as dedicated stakeholders of the incumbent businesses that provide vital investment in the long-term goals of the CWA expansion.
36. For the reasons provided in this Appeal, the granting of this EA is flawed and would not withstand judicial scrutiny.
37. The Appeal accordingly should be upheld and the decision to grant the EA set aside.

Richard Summers Inc.



Per RW Summers



Department of Environmental Affairs and Development Planning
Natasha Bieding
Directorate: Development Management
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EIA REFERENCE: 16/3/3/2/A5/20/2046/24
NEAS REFERENCE: WCP/EIA/0001497/2024
DATE OF ISSUE: 27 OCTOBER 2025

The Board of Directors
Capewinlands Aero (Pty) Ltd.
P. O. Box 12449
MILL STREET
8001

For Attention: Mr. Deon Cloete

Cell: 082 339 2807

E-mail: d.cloete@capewinlands.aero

Dear Sir

APPLICATION FOR ENVIRONMENTAL AUTHORISATION 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): THE PROPOSED EXPANSION OF THE EXISTING 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. With reference to the above application, the Department hereby notifies you of the Competent Authority's decision to **grant** Environmental Authorisation, attached herewith, together with the reasons for the decision.
2. In terms of Regulation 4 of the EIA Regulations, 2014 (as amended), you are instructed to ensure, within fourteen (14) days of the date of the decision on the application, that all registered Interested and Affected Parties ("I&APs") are provided with access to the decision and reasons for the decision, and that all registered I&APs are notified of their right to appeal.
3. Your attention is drawn to Chapter 2 of the National Appeal Regulations, 2025 (as amended), which prescribes the appeal procedure to be followed. This procedure is summarised in the Environmental Authorisation below.

Your interest in the future of the environment is greatly appreciated.

Yours faithfully

Zaahir Toefy Digitally signed by Zaahir Toefy
Date: 2025.10.27 21:19:42
+02'00'

MR. ZAAHIR TOEFY
DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)
WESTERN CAPE GOVERNMENT: ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Copied to:

- (1) Ms. Amanda Fritz-Whyte (PHS Consulting)
- (2) Mr. Paul Slabbert (PHS Consulting)
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EIA REFERENCE: 16/3/3/2/A5/20/2046/24

NEAS REFERENCE: WCP/EIA/0001497/2024

ENVIRONMENTAL AUTHORISATION

APPLICATION FOR ENVIRONMENTAL AUTHORISATION 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): 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

With reference to your application for the abovementioned, find below the outcome with respect to this application.

DECISION

By virtue of the powers conferred on it by the NEMA and the EIA Regulations, 2014 (as amended), the Competent Authority herewith **grants Environmental Authorisation** to the applicant to undertake the Listed Activities specified in Section B below with respect to Alternative 2, described in the final EIA Report (dated 1 July 2025).

In terms of the NEMA and the EIA Regulations, 2014 (as amended), the Competent Authority hereby **adopts the Maintenance Management Plan ("MMP")** submitted together with the final EIA Report.

The applicant for the application for Environmental Authorisation is required to comply with the Conditions set out in Section E below.

A. DETAILS OF THE HOLDER FOR THIS ENVIRONMENTAL AUTHORISATION

Capewinlands Aero (Pty) Ltd.
C/O Mr. Deon Cloete
P. O. Box 12449
MILL STREET
8001

Cell: 082 339 2807
E-mail: d.cloete@capewinlands.aero

The abovementioned applicant is the holder of this Environmental Authorisation and is hereinafter referred to as "**the holder**".

B. LISTED ACTIVITIES AUTHORISED

Listed Activity	Activity/Project Description
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 9 Activity Description: <i>"The development of infrastructure exceeding 1 000 metres in length for the bulk transportation of water or storm water—</i> <i>(i) with an internal diameter of 0,36 metres or more; or</i> <i>(ii) with a peak throughput of 120 litres per second or more;</i> <i>excluding where—</i> <i>(a) such infrastructure is for bulk transportation of water or storm water or storm water drainage inside a road reserve or railway line reserve; or</i> <i>(b) where such development will occur within an urban area."</i>	The development proposal includes the installation of stormwater infrastructure exceeding 1 000 metres in length with an internal diameter of more than 0,36 metres on a site located outside an Urban Area.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 10 Activity Description: <i>"The development and related operation of infrastructure exceeding 1 000 metres in length for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes –</i> <i>(i) with an internal diameter of 0,36 metres or more; or</i> <i>(ii) with a peak throughput of 120 litres per second or more;</i> <i>excluding where—</i> <i>(a) such infrastructure is for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes inside a road reserve or railway line reserve; or</i> <i>(b) where such development will occur within an urban area."</i>	The development proposal includes the installation of sewer- and non-potable water supply infrastructure exceeding 1 000 metres in length with an internal diameter of more than 0,36 metres on a site located outside an Urban Area.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 12 Activity Description: <i>"The development of—</i> <i>(i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or</i> <i>(ii) infrastructure or structures with a physical footprint of 100 square metres or more;</i> <i>where such development occurs—</i> <i>(a) within a watercourse;</i> <i>(b) in front of a development setback; or</i>	The development proposal includes the installation of infrastructure with a physical footprint that exceeds 100m² within 32m of a watercourse on a site located outside an Urban Area.

(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; — excluding— (aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies; (dd) where such development occurs within an urban area; (ee) where such development occurs within existing roads, road reserves or railway line reserves; or (ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared."	
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 13 Activity Description: <i>"The development of facilities or infrastructure for the off-stream storage of water, including dams and reservoirs, with a combined capacity of 50 000 cubic metres or more, unless such storage falls within the ambit of activity 16 in Listing Notice 2 of 2014."</i>	The development proposal includes the establishment of attenuation ponds for stormwater management with a combined capacity of 50 000 cubic metres or more.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 16 Activity Description: <i>"The development and related operation of facilities for the desalination of water with a design capacity to produce more than 100 cubic metres of treated water per day."</i>	The development proposal includes the development of a desalination facility for the treatment of more than 100m³ of groundwater per day.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 19 Activity Description: <i>"The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;</i> <i>but excluding where such infilling, depositing, dredging, excavation, removal or moving—</i> (a) will occur behind a development setback;	The development proposal includes the infilling or depositing, dredging, excavation, removing or moving of more than 10 cubic metres of material from- and/or into a watercourse and wetlands.

(b) is for maintenance purposes undertaken in accordance with a maintenance management plan; (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or (e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies."	
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 24 Activity Description: "The development of a road— (i) for which an environmental authorisation was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010; or (ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres; but excluding a road— (a) which is identified and included in activity 27 in Listing Notice 2 of 2014; (b) where the entire road falls within an urban area; or (c) which is 1 kilometre or shorter."	The development proposal includes the establishment of several roads with a reserve wider than 13,5 meters, or where no reserve exists, where the roads are wider than 8 metres.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 25 Activity Description: "The development and related operation of facilities or infrastructure for the treatment of effluent, wastewater or sewage with a daily throughput capacity of more than 2 000 cubic metres but less than 15 000 cubic metres."	The development proposal includes the development of a sewage treatment facility with a daily throughput capacity of more than 2 000 cubic metres but less than 15 000 cubic metres.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 26 Activity Description: "Residential, retail, recreational, tourism, commercial or institutional developments of 1 000 square metres or more, on land previously used for mining or heavy industrial purposes; — excluding — (i) where such land has been remediated in terms of part 8 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the National Environmental Management: Waste Act, 2008 applies; or (ii) where an environmental authorisation has been obtained for the decommissioning of such a mine	The proposal includes the development of commercial, tourism and retail components that exceeds 1 000 square metres, on a site that was previously used for mining purposes.

or industry in terms of this Notice or any previous NEMA notice; or (iii) where a closure certificate has been issued in terms of section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) for such land."	
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 28 Activity Description: "Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes."	The proposed development includes the transformation of agricultural land that exceeds 5 hectares on a site located outside an Urban Area.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 48 Activity Description: "The expansion of— (i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or (ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more; where such expansion occurs— (a) within a watercourse; (b) in front of a development setback; or (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding— (aa) the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such expansion activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 23 in Listing Notice 3 of 2014, in which case that activity applies; (dd) where such expansion occurs within an urban area; or	The development proposal includes the expansion of infrastructure by more than 100m² within a watercourse and/or within 32m of a watercourse and wetlands.

(ee) where such expansion occurs within existing roads, road reserves or railway line reserves."	
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 56 Activity Description: <i>"The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre—</i> <i>(i) where the existing reserve is wider than 13,5 meters;</i> <i>or</i> <i>(ii) where no reserve exists, where the existing road is wider than 8 metres;</i> <i>excluding where widening or lengthening occur inside urban areas."</i>	The development proposal includes the widening of existing roads by more than 6 metres, where the reserve is wider than 13,5 meters on a site located outside an Urban Area.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 61 Activity Description: <i>"The expansion of airports where the development footprint will be increased."</i>	The development proposal includes the expansion of an existing airport, resulting in an increased development footprint.
Listing Notice 2 of the EIA Regulations, 2014 (as amended)– Activity Number: 1 Activity Description: <i>"The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more, excluding where such development of facilities or infrastructure is for photovoltaic installations and occurs —</i> <i>(a) within an urban area; or</i> <i>(b) on existing infrastructure."</i>	The development proposal includes the installation of infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more on a site that is located outside an Urban Area.
Listing Notice 2 of the EIA Regulations, 2014 (as amended)– Activity Number: 4 Activity Description: <i>"The development and related operation of facilities or infrastructure, for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of more than 500 cubic metres."</i>	The development proposal includes the storage of dangerous goods at various facilities on the site, with a combined capacity of more than 500 cubic metres.
Listing Notice 2 of the EIA Regulations, 2014 (as amended)– Activity Number: 7 Activity Description: <i>"The development and related operation of facilities or infrastructure for the bulk transportation of dangerous goods—</i> <i>(i) in gas form, outside an industrial complex, using pipelines, exceeding 1 000 metres in length, with</i>	The development proposal includes the installation of a feeder pipeline for the transfer of dangerous goods with a throughput of approximately 312m³/day and a length exceeding 1000 metres.

<i>a throughput capacity of more than 700 tons per day;</i> (ii) <i>in liquid form, outside an industrial complex, using pipelines, exceeding 1 000 metres in length, with a throughput capacity of more than 50 cubic metres per day; or</i> (iii) <i>in solid form, outside an industrial complex, using funiculars or conveyors with a throughput capacity of more than 50 tons per day."</i>	
Listing Notice 2 of the EIA Regulations, 2014 (as amended)– Activity Number: 15 Activity Description: <i>"The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for—</i> (i) <i>the undertaking of a linear activity; or</i> (ii) <i>maintenance purposes undertaken in accordance with a maintenance management plan."</i>	The development proposal includes the clearance of more than 20 hectares of indigenous vegetation.
Listing Notice 2 of the EIA Regulations, 2014 (as amended)– Activity Number: 27 Activity Description: <i>"The development of a road—</i> (i) <i>.....</i> (ii) <i>.....</i> (iii) <i>with a reserve wider than 30 metres; or</i> (iv) <i>catering for more than one lane of traffic in both directions;</i> <i>but excluding a road—</i> (a) <i>for which an environmental authorisation was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010, in which case activity 24 in Listing Notice 1 of 2014 applies;</i> (b) <i>which is 1 kilometre or shorter; or</i> (c) <i>where the entire road falls within an urban area."</i>	The proposal includes the development of roads catering for more than one lane of traffic in both directions.
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 1 Activity Description: <i>"The development of billboards exceeding 18 square metres in size outside urban areas, mining areas or industrial complexes.</i> i. <i>Western Cape</i> i. <i>All areas outside urban areas, mining areas or industrial complexes."</i>	The development proposal includes the installation of billboards exceeding 18 square metres in size on the site located outside an Urban Area.

Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 2 Activity Description: <i>"The development of reservoirs, excluding dams, with a capacity of more than 250 cubic metres.</i> i. Western Cape i. A protected area identified in terms of NEMPAA, excluding conservancies; ii. In areas containing indigenous vegetation; or iii. Inside urban areas: (aa) Areas zoned for use as public open space; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority, or zoned for a conservation purpose."	The development proposal includes the development of reservoirs with a total capacity of more than 250 cubic metres on a site that contains indigenous vegetation.
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 3 Activity Description: <i>"The development of masts or towers of any material or type used for telecommunication broadcasting or radio transmission purposes where the mast or tower—</i> <i>(a) is to be placed on a site not previously used for this purpose; and</i> <i>(b) will exceed 15 metres in height—</i> <i>but excluding attachments to existing buildings and masts on rooftops.</i> i. Western Cape i. All areas outside urban areas; ii. Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority, or zoned for a conservation purpose, within urban areas; or iii. Areas zoned for use as public open space or equivalent zoning within urban areas."	The development proposal includes the development of towers exceeding 15 metres in height on a site located outside an Urban Area.
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 4 Activity Description: <i>"The development of a road wider than 4 metres with a reserve less than 13,5 metres.</i> i. Western Cape i. Areas zoned for use as public open space or equivalent zoning; ii. Areas outside urban areas; (aa) Areas containing indigenous vegetation; (bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or	The development proposal includes the establishment of roads wider than 4 metres with a reserve less than 13,5 metres on a site that contains indigenous vegetation located outside an Urban Area.

iii. Inside urban areas: (aa) Areas zoned for conservation use; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority."	
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 12 Activity Description: "The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. i. Western Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans; iii. Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas; iv. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or v. On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister."	The development proposal includes the clearance of more than 300m² of Critically Endangered indigenous vegetation.
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 18 Activity Description: "The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre. i. Western Cape i. Areas zoned for use as public open space or equivalent zoning; ii. All areas outside urban areas: (aa) Areas containing indigenous vegetation; (bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or iii. Inside urban areas: (aa) Areas zoned for conservation use; or	The development proposal includes the widening of roads by more than 4 metres on a site that contains indigenous vegetation located outside an Urban Area.

(bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority."	
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 19 Activity Description: <i>"The expansion of runways or aircraft landing strips where the expanded runways or aircraft landing strips will be longer than 1,4 kilometres in length.</i> i. Western Cape i. All areas outside urban areas."	The development proposal includes the expansion of the existing landing strip by more than 1,4 kilometres on a site located outside an Urban Area.

The abovementioned list is hereinafter referred to as **"the Listed Activities"**.

The holder is herein authorised to undertake the abovementioned Listed Activities for the below Alternative, which entails the expansion of the existing Cape Winelands Airport ("CWA"), comprising the development of five precincts, one of which will be the Agricultural Precinct. The remaining four precincts, *namely*; the Services Precinct, the Airside Precinct, the Terminal Precinct, and the General Aviation Precinct, will be developed in two distinct phases. After the implementation of Phase 1 stipulated below, Phase 2 will evolve in response to market demand.

Phase 1:

- An Agricultural Precinct, measuring approximately 462ha in extent, comprises the continuation of the existing agricultural component. This Precinct includes the construction of the following:
 - an existing main access roads and internal farm roads left unchanged;
 - areas of intact vegetation respected as 'no-go' areas for conservation;
 - establishment of the required firebreaks;
 - establishment of wetland rehabilitation;
 - establishment of designated wetland offset areas;
 - construction and installation of associated stormwater infrastructure; and
 - fence line on the outer perimeter and a shared security fence line with the Airside precinct.
- A Services Precinct, measuring approximately 65ha, which will include the construction of the following:
 - a maintenance repairs and operational hanger;
 - an aircraft sanitary station;
 - an airport maintenance facility/area;
 - a catering building;
 - a Ground Support Equipment ("GSE") staging and maintenance facility;
 - a Fuel farm;
 - a cargo terminal;
 - an Aircraft Rescue and Firefighting facility;
 - an Operations Centre ("OPS");
 - an Air Traffic Control centre;
 - an Eskom incoming and Substations;
 - a groundwater and potable water treatment facility and storage area;
 - a water pump station;
 - a non-potable treatment facility and storage area;
 - a solid waste area;
 - a firefighting water pump station;
 - areas for airport use; and
 - internal road and services configuration.

- An Airside Precinct, measuring approximately 249ha, which will include the construction of the following:
 - a primary runway of measuring approximately 3.5km in length at an orientation of approximately 01-19 and taxi ways;
 - Solar Photovoltaics ("PV") ;
 - airport parking;
 - a maintenance repairs and operations apron;
 - a cargo apron;
 - an Eskom incoming and substation;
 - a Remote Digital Control Tower System;
 - Localizer, Glidepath antennae, and Precision Approach Path Indicator ("PAPI");
 - Runway End Safety Areas ("RESA") areas around the runway and taxi lanes;
 - Landscaping;
 - firebreaks;
 - establishment of conservation areas;
 - establishment of re-vegetated areas; and
 - internal road and services configuration.

- A Terminal Precinct, measuring approximately 57ha, which will include the construction of the following:
 - landscaping;
 - a passenger terminal building;
 - a car rental and public transport;
 - parking, pick up and drop off area
 - GSE staging;
 - cargo;
 - an energy centre and aircraft sanitary station;
 - a land side substation ("LSS");
 - a hotel;
 - various areas for airport use;
 - aero vintage;
 - restaurants;
 - a petrol and diesel service station;
 - access roads, internal roads and associated infrastructure; and
 - Internal road and services configuration.

- A General Aviation Precinct, measuring approximately 50ha, which will include the construction of the following:
 - a General Aviation/VIP/Government terminal;
 - parking
 - fixed base operators
 - General Aviation hangars
 - a General Aviation Clubhouse and fueling facility;
 - a special cargo facility;
 - an OPS (Operations Centre);
 - access control areas;
 - areas for airport use;
 - a heliport;
 - internal road and services configuration; and
 - signage and billboards.

- Associated infrastructure and components which will include the construction of the following:
 - a sewage pipeline leading to the Fisantekraal Waste Water Treatment Works ("WWTW");
 - a potable waterline;
 - on-site stormwater infrastructure;
 - an Eskom line;
 - access roads and alignment;
 - Solar PV (on buildings);

- perimeter fencing; and
- firebreaks.

Phase 2:

- Continued use of the abovementioned Agricultural Precinct, comprising of the following:
 - areas of intact vegetation for conservation purposes;
 - firebreaks;
 - wetland rehabilitation;
 - wetland offset;
 - existing agricultural areas remaining intact;
 - existing access roads remaining;
 - stormwater infrastructure;
 - a fence line; and
 - a shared security fence line with the Airside precinct.
- Continued use of the abovementioned Services Precinct, which will include the construction of the following:
 - groundwater containment and treatment measures;
 - sewage containment and treatment;
 - containment of treated sewage water (inclusive of emergency storage) and pumpstation;
 - a solid waste area
 - a biodigester (using grass feedstock and treated sewage water);
 - Eskom incoming and LS substation;
 - a firefighting water pump station
 - an Aircraft sanitary station;
 - maintenance, repair, and overhaul ("MRO") hangar;
 - a maintenance area;
 - a parking area;
 - a catering building;
 - GSE maintenance and staging area;
 - a fuel farm and underground fuel line
 - a substation
 - a cargo terminal;
 - Aircraft Rescue and Fire Fighting ("ARFF");
 - an OPS (Operations Centre);
 - an Air Traffic Control Tower
 - an Existing quarry to be used for stormwater retention;
 - internal road and services configuration; and
 - landscaping.
- Continued use of the abovementioned Airside Precinct, which will include the construction of the following:
 - a 3.5km long runway;
 - taxi areas;
 - solar PV;
 - aircraft parking;
 - an MRO apron;
 - a cargo apron;
 - Eskom incoming and substations;
 - a Remote Digital Control Tower System ("RDTS")
 - a PAPI;
 - internal road and services configuration;
 - an underground fuel line;
 - RESA areas around the runway and taxi lanes
 - landscaping;
 - firebreaks;
 - conservation areas; and
 - re-vegetated areas.

- Continued use of the abovementioned Terminal Precinct, which will include the construction of the following:
 - landscaping;
 - a passenger terminal building;
 - a car rental and public transport facility;
 - a parking, pick up and drop off facility;
 - pier expansion reservation;
 - a terminal reserve;
 - GSE staging area;
 - Cargo area;
 - an energy centre and aircraft sanitary station;
 - an LS SS (Land Side Substation);
 - two (2) hotels;
 - airport use area;
 - aero vintage;
 - restaurants
 - a service station; and
 - internal road and services configuration.
- Continued use of the abovementioned General Aviation Precinct, which will include the construction of the following:
 - General Aviation/VIP/Government Terminal;
 - parking;
 - fixed base operators;
 - General Aviation Hangers;
 - General Aviation clubhouse and fueling;
 - a special cargo facility;
 - an OPS (Operations Centre);
 - an access control facility;
 - transport use area;
 - airport use, i.e., associated buildings and facilities and uses supplementary to the runway use;
 - heliport;
 - internal road and services configuration; and
 - landscaping.

The total development footprint amounts to approximately 883ha in extent.

C. SITE DESCRIPTION AND LOCATION

The Listed Activities will be undertaken 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. The overall site is generally bordered by the R312 Regional Road and Garden Cities Urban residential development in the South.

The SG 21-digit codes are given below:

Farm No.	SG 21-digit code
Portion 10 of the Farm No. 724	C05500000000072400010
Remaining Extent of the Farm No. 724	C05500000000072400000
Portion 23 of the Farm No. 724	C05500000000072400023
Portion 7 of the Farm No. 942	C04600000000094200007
Remaining Extent of the Farm No. 474	C05500000000047400000
Portion 3 of the Farm No. 474	C05500000000047400003
Portion 4 of the Farm No. 474	C05500000000047400004

The co-ordinates are given below:

Farm No.	Co-ordinates	
Portion 10 of the Farm No. 724	33°46'13.90"S	18°44'21.28"E

Remaining Extent of the Farm No. 724	33°45'49.16"S	18°44'0.07"E
Portion 23 of the Farm No. 724	33°45'27.43"S	18°43'54.68"E
Portion 7 of the Farm No. 942	33°44'30.59"S	18°44'8.08"E
Remaining Extent of the Farm No. 474	33°45'11.48"S	18°44'41.56"E
Portion 3 of the Farm No. 474	33°45'48.21"S	18°44'37.51"E
Portion 4 of the Farm No. 474	33°46'8.83"S	18°44'41.85"E

Runway and strip co-ordinates:

Point Number	Easting	Northing	Full Description	Longitude	Latitude
1	-23629.1333	-3738473.4669	RWY01-BP-START	E18° 44' 41.67"	S33° 46' 21.56"
2	-23674.0587	-3738362.1937	RWY01-THR	E18° 44' 39.94"	S33° 46' 17.94"
3	-24329.2203	-3736739.4605	RWY01-19-CENTER	E18° 44' 14.64"	S33° 45' 25.22"
4	-24984.3820	-3735116.7272	RWY19-THR	E18° 43' 49.34"	S33° 44' 32.50"
5	-25029.3074	-3735005.4541	RWY19-BP-START	E18° 43' 47.61"	S33° 44' 28.88"

Potable line incoming co-ordinates:

Start point	33°46'35.4496"S	18°44'08.0467"E
Middle point	33°46'40.5740"S	18°43'40.2163"E
End point	33°46'59.7546"S	18°42'44.5603"E

Sewage line outgoing to Fisantekraal WWTW co-ordinates:

Start point	33°45'05.4015"S	18°43'46.0530"E
Middle point	33°45'04.3129"S	18°43'35.4933"E
End point	33°45'07.2134"S	18°43'28.2157"E

Refer to **Annexure 1**: Locality Maps. Refer to **Annexure 2**: Spatial Plan.
The above property is hereinafter referred to as "**the site**".

D. DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

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HERMANUS
7200

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E. CONDITIONS OF AUTHORISATION

Scope of Authorisation

1. The holder is authorised to undertake the Listed Activities specified in Section B above in accordance with and restricted to Alternative 2 described in Section B above.
2. The holder must commence with, and conclude, the Listed Activities within the stipulated validity period which this Environmental Authorisation is granted for, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority.

This Environmental Authorisation is granted for –

- (a) A period of ten **(10)** years, from the date of issue, during which period the holder must commence with the authorised Listed Activities.
 - (b) A period of twenty **(20)** years, from the date the holder commenced with the authorised Listed Activities, during which period the authorised Listed Activities must be concluded.
3. The holder shall be responsible for ensuring compliance with the conditions by any person acting on his behalf, including an implementing agent, sub-contractor, employee or any person rendering a service to the holder.
4. Any changes to, or deviations from the scope of the alternative described in section B above must be approved in writing by the Competent Authority before such changes or deviations may be implemented. In assessing whether or not to grant such approval, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.

Written Notice to the Competent Authority

5. A written notice of seven (7) calendar days must be given to the Competent Authority before construction work can be commenced with.
 - 5.1. The notice must make clear reference to the site details and EIA Reference number given above.
 - 5.2. The notice must include proof of compliance with the following Conditions described herein:

Conditions: 6, 7, 9, 12, 29, 31, 32, 37, 38, 40.1, 40.2, 40.3, 41.1., 41.2., 41.13, 41.13.1., 41.13.2., 41.13.3., 41.13.4, 41.13.5., 41.13.6., 46, 47, 49.1., 49.2., 49.3.

Notification of Environmental Authorisation and Administration of Appeal

6. The holder must in writing, within fourteen (14) calendar days of the date of this decision–
 - 6.1. notify all registered Interested and Affected Parties ("I&APs") of –
 - 6.1.1. the decision reached on the application.
 - 6.1.2. the reasons for the decision as included in Annexure 4;
 - 6.1.3. the date of the decision; and
 - 6.1.4. the date when the decision was issued.
 - 6.2. draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2025 detailed in Section F below;

- 6.3. draw the attention of all registered I&APs to the manner in which they may access the decision;
- 6.4. provide the registered I&APs with the:
 - 6.4.1. name of the holder (entity) of this Environmental Authorisation;
 - 6.4.2. name of the responsible person for this Environmental Authorisation;
 - 6.4.3. postal address of the holder;
 - 6.4.4. telephonic and fax details of the holder;
 - 6.4.5. e-mail address, if any, of the holder; and
 - 6.4.6. contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the National Appeals Regulations, 2025.

Commencement

7. The Listed Activities, including site preparation, must not be commenced with within (20) twenty calendar days from the date the holder notifies the registered I&APs of this decision.
8. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided.

Management of Activity

9. The Environmental Management Programme ("EMPr") (dated July 2025) is hereby approved, subject to the inclusion of the following provision:
 - 9.1. The implementation of the biodiversity offset requirements that have been made conditional to this Environmental Authorisation.
10. The updated EMPr must be submitted to this Directorate for record purposes prior to the commencement of earthmoving- or construction activities.
11. Environmental Authorisation, the EMPr and MMP must be included in all contract documentation for all phases of implementation.

Monitoring

12. The holder must appoint a suitably experienced Environmental Control Officer ("ECO") before the Listed Activities can be commenced with, to ensure compliance with the EMPr and the conditions contained herein. The ECO must submit ECO reports on a quarterly basis for the duration of the construction phase.
13. A copy of the Environmental Authorisation, EMPr, ECO reports, audit reports and compliance monitoring reports must be kept at the contractor's site office during the construction phase and thereafter the said documents must be kept at the office of the holder and must be made available to any authorised official of the Competent Authority on request.
14. Access to the site referred to in Section C must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see the reports for the purposes of assessing and/or auditing compliance with the conditions contained herein.

Auditing

15. In terms of Regulation 34 of the EIA Regulations, 2014 (as amended), the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation and the EMPr. Environmental audit reports must be compiled and submitted to the Competent Authority. Environmental audit reports must be prepared by an independent person with expertise and must contain all the information required in Appendix 7 of the EIA Regulations, 2014 (as amended).
16. The audit reports must be compiled and subsequently submitted to the Competent Authority in the following manner:
 - 16.1. An audit report must be submitted to the Competent Authority within six (6) months of the commencement of the construction phase; and
 - 16.2. A final audit report must be submitted within three (3) months of the proposed development being completed.
 - 16.3. The holder must submit an environmental audit report every five (5) years while the Environmental Authorisation remains valid.
17. The audit report must indicate compliance status with the Conditions of this Environmental Authorisation, and the EMPr and make recommendations for improved environmental management.
18. The holder must, within seven (7) calendar days of the submission of the audit report to the Competent Authority, notify all registered I&APs of the submission and make the audit report available to any registered I&AP on request and, where the holder has such a facility, place on a publicly accessible website.

Specific Conditions

19. Should any heritage remains be exposed during excavations or any other actions on the site, this must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be disturbed further until the necessary approval has been obtained from Heritage Western Cape.

Heritage remains include, *inter alia*, meteorites, archaeological and/or paleontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.
20. A qualified archaeologist and/or paleontologist must be contracted where necessary (at the expense of the holder) to remove any heritage remains. Heritage remains can only be disturbed by a suitably qualified heritage specialist working in accordance with a directive from the relevant heritage resources authority.
21. An integrated waste management approach must be used based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste that cannot be recycled, re-use shall be disposed of at a licensed waste disposal facility.
22. An Emergency Preparedness and Response Plan must be compiled by a suitably qualified person and must be implemented. The finalised Emergency Preparedness and Response Plan that incorporates the comments obtained from the City of Cape Town must be submitted to this Directorate together with the comments obtained prior to the operation of Phase 1.

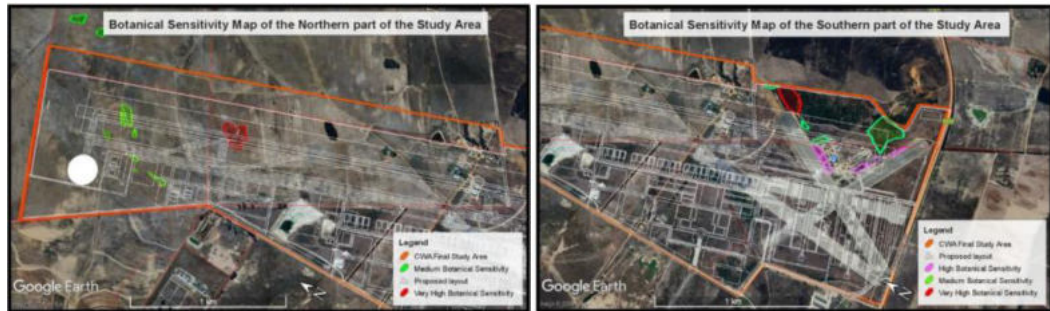
23. A Wildlife Hazard Management Plan must be compiled by a suitably qualified person and must be implemented. The finalised Wildlife Hazard Management Plan that incorporates the comments obtained from the City of Cape Town, the South African Civil Aviation Authority ("SACCA") and CapeNature, must be submitted to this Directorate together with the comments obtained prior to the operation of Phase 1.
24. The Waste Management Plan (dated July 2025 and compiled by PHS Consulting) must be implemented.
25. The Veldfire Management Plan (dated July 2025 and compiled by PHS Consulting) must be implemented.
26. The Alien Vegetation Management Plan (dated July 2025 and compiled by PHS Consulting) must be implemented.
27. A copy of the documentation from the National Department of Water and Sanitation ("DWS"), as it pertains to the wetland offset must be submitted to this Directorate for record purposes.
28. Landscaping Plans for each Precinct must be compiled with input from a suitably qualified specialist botanist and must be implemented. The botanist must advise on, *inter alia*, the use of indigenous Sand Fynbos and Renosterveld appropriate plant component, maximising biodiversity rehabilitation, remaining cognisant of the airport safety guidelines and hydroseeded requirements. Copies of the approved Landscaping Plans must be submitted together with the approval letters prior to the commencement of landscaping for each Precinct.
29. Urban Design Guidelines addressing aspects of fencing, walls, entrances and boundary interfaces, lighting as well as materials and finishes, must be implemented for the development. Copies of the Urban Design Guidelines submitted to the City of Cape Town for approval/input and must be submitted to this Directorate together with the comments obtained for record purposes prior to the commencement of earthmoving- or construction activities.
30. The Groundwater Monitoring and Management Plan must be implemented. A copy of the Groundwater Monitoring and Management Plan approved by the National Department of Water and Sanitation must be submitted to this Directorate for record purposes prior to the operation of Phase 1.
31. A Dust Management Plan must be implemented. The Dust Management Plan, approved by the relevant authority, must be submitted to this Directorate for record purposes prior to the commencement of earthmoving- and construction activities.
32. A Water Scarcity Management Plan must be developed by a suitably qualified specialist to mitigate water scarcity risks and must be implemented. The Water Scarcity Management Plan must be submitted to this Directorate prior to the commencement of earthmoving- and construction activities.
33. The Maintenance Management Plan submitted together with the final EIA Report must be implemented.
34. Based on the Botanical Biodiversity Offset Agreement (dated 29 September 2024), which has been signed by the relevant parties contained therein, the following must be implemented:
 - 34.1. The holder of this Environmental Authorisation must secure the biodiversity offset site through the provision of the necessary resources, as follows:
 - 34.1.1. Ensure the formal protection and effective ecological management of a minimum 89ha of Critically Endangered indigenous vegetation for thirty

(30) years, i.e. Swartland Silcrete, Shale- and Granite Renosterveld vegetation within the northern extent of the Farm Hercules Pilaar No. 1242, Paarl, as delineated in the dark red polygon depicted in Annexure 3 of this Environmental Authorisation:

- 34.1.2. The offset-receiving area must be secured under a formal conservation protection status, in accordance with the recommendation of the CapeNature Stewardship Advisory Committee and the applicable stewardship category endorsed by CapeNature.
- 34.2. The identified offset site must be presented to the CapeNature Stewardship Advisory Committee within two (2) years of the date of this Environmental Authorisation and proof thereof submitted to this Directorate within one (1) calendar week of such presentation having taken place.
- 34.3. The identified offset site must be secured under formal conservation protection, with the aim of achieving its declaration, as a Nature Reserve in terms of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEM: PAA"). This process must include the implementation of title deed restrictions and rezoning under an appropriate stewardship category, as recommended by the CapeNature Stewardship Advisory Committee, within five (5) years from the date of issue of this Environmental Authorisation. Proof of progress towards, and/or confirmation of, the formal declaration and acquired protection status must be submitted to this Directorate, as part of the environmental audit reporting required in terms of Condition 15 of this Environmental Authorisation.
- 34.4. The Botanical Biodiversity Offset Agreement (dated 29 September 2024) entered into between the holder of this Environmental Authorisation and the joint owners of the Farm Hercules Pilaar No. 1242, Paarl must be subject to regular independent audits to ensure the effective implementation of the biodiversity offset, as follows:
 - 34.4.1. Independent audits must be undertaken annually during the construction phase and at least every five (5) years thereafter, until such time as the offset site has been formally declared and received the required Protection Status.
 - 34.4.2. Each independent auditor must assess and report on the following:
 - 34.4.2.1. The ecological condition and performance of the minimum 89ha offset site;
 - 34.4.2.2. The adequacy and effectiveness of the resources provided to achieve the offset objectives; and
 - 34.4.2.3. The need for any corrective or adaptive management measures required to meet the intended conservation outcomes.
 - 34.4.3. The holder of this Environmental Authorisation in collaboration with the identified Public Benefit Organisation must ensure that the offset areas are actively managed and maintained to achieve and sustain the required ecological condition.
35. A final Biodiversity Offset Management Plan must be compiled by a suitable qualified biodiversity offset consultant and must be implemented for the approved offset site. The final Biodiversity Offset Management Plan, which incorporates comments from CapeNature and the relevant City of Cape Town Biodiversity Management Branch, must be compiled prior to the biodiversity offset receiving the required Protection Status. The final Biodiversity Offset Management Plan must be submitted to this Directorate for record purposes together with the comments obtained.
36. The costs of securing and managing the offset site for first thirty (30) years must be the sole responsibility of the holder of this Environmental Authorisation.

37. The approved Stormwater Management Plan must be implemented to adequately manage stormwater and avoid, or if not possible, mitigate the associated stormwater-related impacts. The approved Stormwater Management Plan that incorporates comments from the City of Cape Town must be submitted to this Directorate together with the comments, prior to the commencement of earthmoving- and construction activities.
38. The Bird and Wildlife Hazard Management Landscape and Open Space Planning Guideline (dated February 2024 and compiled by Avri Avian Environmental) must be implemented. The Bird and Wildlife Hazard Management Landscape and Open Space Planning Guideline that incorporates comments from the City of Cape Town, the SACAA and CapeNature, must be submitted to this Directorate together with the comments obtained, prior to the commencement of earthmoving- and construction activities.
39. A detailed Process Hazard Analysis / Hazard and Operability Study ("HAZOP") must be completed for the entire development by an independent chairperson who is registered with the Engineering Council of South Africa and must be implemented. The final Process Hazard Analysis / HAZOP that incorporates comments from the City of Cape Town: Fire and Rescue Services Department must be submitted to this Directorate together with the comments obtained, prior to the commencement of operational activities under Phase 1.
40. The following measures, adapted from the Visual Impact Assessment Report (dated 26 February 2025 and compiled by Filia Visual (Pty) Ltd), must be implemented:
 - 40.1. An Overall Lighting Report must be prepared by a suitably qualified electrical engineer and must be implemented. The approved Overall Lighting Report that incorporates comments from the City of Cape Town must be submitted to this Directorate together with the comments obtained, prior to the commencement of earthmoving- and construction activities.
 - 40.2. A detailed Lighting proposal for all outdoor lighting, i.e., façade lighting (if any), street lighting and security lighting would be visible from within the receiving environment that focuses on the sensitivities of the adjacent cultural Landscape and the relevant scenic routes, must be prepared and implemented. The approved Lighting proposal that incorporates comment from the City of Cape Town must be submitted to this Directorate together with the comments obtained, prior to the commencement of operations of Phase 1.
 - 40.3. A Signage Plan must be developed in terms of the Outdoor Advertising and Signage Policy and By-law and must be implemented. A copy of the approved signage plan that incorporates comments from the City of Cape Town must be submitted to this Directorate together with the comments obtained for record purposes prior to any signage being erected on the site.
41. The following measures adapted from the Plant Species Impact Assessment Report (dated 10 February 2025 and compiled by Nick Helme Botanical Surveys), must be implemented:
 - 41.1. All hard infrastructure bordering on any of the mapped areas of 'Very High', 'High' and 'Medium' sensitivity botanical areas must be surveyed and fenced off. The fencing must be marked with signage to indicate that these are 'no-go' areas at 15m intervals, prior to any commencement of earthmoving- or construction activities.
 - 41.2. Where the perimeter of fenced off areas are positioned within 20m of the RESA (runway clearance area), it must be buffered by an ecological buffer area of at least 5m wide that is not disturbed by any earthmoving activities or development.
 - 41.3. No perimeter service road may traverse nor disturb the mapped areas of 'Very High' sensitivity east of the main runway.

- 41.4. All 'Very High', 'High' and 'Medium' sensitivity areas in the below image that fall outside the development (construction) footprint must be appropriately conserved, which must include but not limited, no development and no infrastructure being located in these areas, ecologically connecting these areas with other areas via rehabilitation, and ongoing alien invasive vegetation management.



- 41.5. All invasive alien vegetation in the conservation areas on the site must be removed within one (1) year of the date of issue of this Environmental Authorisation, by appropriately qualified personnel.
- 41.6. Ongoing annual alien vegetation removal must be undertaken.
- 41.7. No spraying of herbicide must be undertaken in any conservation area.
- 41.8. Once all alien invasive vegetation has been removed from the conservation areas all these areas must be subject to planned (controlled) burn regimes that must be professionally managed.
- 41.9. Prior to the controlled burn, firebreaks must be established around the perimeter of the sensitive areas (not within them) using handheld brush cutters. No heavy machinery must be used to establish the firebreaks.
- 41.10. The botanically sensitive areas must be burnt every 8-12 years for optimum ecological functioning.
- 41.11. The 'Very High' sensitivity areas falling within the Agricultural Precinct must be fenced off and excluded from grazing and trampling by livestock (especially cattle). The fencing off of this area must be completed within sixty (60) days of the date of issue of this Environmental Authorisation.
- 41.12. The conditions of all 'Very High', 'High' and 'Medium' sensitivity area, which includes the Agricultural Precinct, must be monitored every year by a suitably qualified botanist. The appointed botanist must make recommendations for any management changes or actions, i.e., alien clearing, lack of fire, etc., that are needed in order to achieve optimal ecological functioning in these areas.
- 41.13. A search and rescue operation must be done in consultation with the botanist. The search and rescue operation must be undertaken prior to the commencement of earthmoving- or construction activities, and must include the following:
- 41.13.1. The translocation of Species of Conservation Concern ("SCC") searched and rescued within the development footprint;
 - 41.13.2. The translocation of plants and material searched and rescued within the 'Very High', 'High' and 'Medium' sensitivity areas;
 - 41.13.3. The collection of seed, sods and cuttings;

- 41.13.4. Keeping record of where the collected seed, sods and cuttings were stored and the quantities of seed, sods and cuttings stored;
- 41.13.5. Keeping record of how the receiving sites were identified and prepared to receive the collected seed, sods and cuttings; and
- 41.13.6. Implementing measures that will guide ongoing maintenance of the receiving areas.
- 41.14. Brush cutting and mowing of open airside (hydroseeded) areas during the operational phase must be timed to allow for winter growth, spring flowering and early summer fruiting of most of the indigenous plant species and must thus not be undertaken between 1 June and 15 October (provided that this is not in conflict with operational safety protocols).
- 42. The following measures adapted from the final EIA Report (dated July 2025 and compiled by PHS Consulting), must be implemented:
 - 42.1. A certified Pest Control Company must be appointed at the onset of the construction- and operational phases to ensure that preventative measures are put in place. The measures must be monitored to ensure the effectiveness of the Pest Control measures being implemented. Should any recommendations for improvements be required, then such information must be included in a revised Waste Management Plan that must be implemented. The updated Waste Management Plan must be submitted to this Directorate for record purposes.
 - 42.2. The Colenso Fault located to the north-east section of the site, must be treated as a 'no-go' area to ensure that high-risk activities such as the aviation fuel farm, bulk fuel storage, retail service station or other associated activities are prohibited within this area.
 - 42.3. The Agricultural Precinct must be treated as a 'no-go' area throughout the lifecycle of the development.
 - 42.4. The exposed water surface area of the rehabilitated quarry must be suitably covered, as far as possible, in order to mitigate the attraction of birdlife.
 - 42.5. Suitable vegetation must be planted on either side of the ponds to discourage bird movement between ponds.
- 43. The obstacles listed under Appendix A of this Decision must be clearly marked and identified with day and night markings of buildings and obstacles.
- 44. The following measures adapted from the Air Quality Impact Assessment Report (dated June 2025 and compiled by DDA Environmental Engineers), must be implemented:
 - 44.1. Dust monitoring along the western, southern and northern boundaries must be conducted monthly during construction and reported quarterly to the relevant authorities, including this Directorate. Any noted exceedances in the prescribed guidelines and requirements, e.g., municipal by-laws, must be treated with appropriate rectification measures and proof thereof included in the report to be submitted to the relevant authorities.
 - 44.2. A continuous air quality monitoring station must be established along the northern boundary of the site prior to the operational phase. The air quality monitoring station must monitor air pollutants, including SO₂, NO_x, PM¹⁰ and Benzene. The monitoring results must be reported to the relevant authorities, including this Directorate on a biannual basis (six monthly). Any noted exceedances in the prescribed guidelines and requirements must be treated with appropriate

rectification measures and proof thereof included in the report to be submitted to the relevant authorities.

45. The following measures adapted from the Noise Impact Assessment Report (dated June 2025 and compiled by DDA Environmental Engineers), must be implemented:
 - 45.1. Noise mitigation measures must be finalised prior to commencement of the operation in terms of Scenario 3, *i.e.*, operation of the new runway at full capacity taking place. A copy of the finalised noise mitigation measures that must be implemented accordingly must be submitted to this Directorate as well as all relevant authorities and stakeholders prior to the commencement and operation in terms of the abovementioned Scenario 3 taking place.
 - 45.2. Noise monitoring in accordance with the relevant methods stipulated in the South African National Standards ("SANS") codes and current Western Cape Noise Control Regulations, 2013 (Provincial Notice 200 of 2013), must be conducted on a quarterly basis during the construction phase and conducted monthly when night-time construction takes place.
 - 45.2.1. Quarterly reports must be submitted to the relevant authorities as well as this Directorate.
 - 45.2.2. The quarterly reports must report any construction-specific noise exceedances above the noise standards and measures stipulated in the SANS 10103:2008 and SANS 10328:2008 (or latest versions).
 - 45.2.3. In the event of exceeding the said noise standards and measures, appropriate site- and operation-specific noise mitigation measures must be investigated and implemented, and proof thereof included in subsequent reports submitted to the relevant authorities as well as this Directorate.
 - 45.3. A noise complaints registry must be established and connected with the noise monitoring system, in order to provide the capability for correlation of the complaints with the actual measured levels, as well as the aircraft-related operational data. The complaints and relevant aircraft-related operational data must be included in the quarterly reports submitted to the relevant authorities.
 - 45.4. Three permanent noise monitoring terminals must be established before the commencement of the operational phase. The first of these terminals must be established at the Klipheuwel area, preferably close to its southeastern boundary. The second must be positioned within the Greenville Garden City residential development site in line with the new runway 01/19, and the third on the eastern side of the Bella Riva development site. The resultant noise monitoring results must be reported on a quarterly basis to the appropriate authorities as well as this Directorate and must include, but not be limited to, the following:
 - 45.4.1. 24-hour equivalent continuous A-weighted sound pressure level, LAeq,T;
 - 45.4.2. equivalent continuous day-night rating level, LRdn;
 - 45.4.3. equivalent continuous day and night rating levels, LRd and LRn;
 - 45.4.4. maximum A-weighted level, LAmax;
 - 45.4.5. percentile levels Ln;
 - 45.4.6. number of exceedances above 70 dB(A) and 60 dB(A) of the LAmax and SEL; and

45.4.7. complaints and relevant aircraft-related operational data.

46. A Noise Mitigation and Management Plan ("NMMP"), with measurable goals to prevent and intricately manage noise emissions from the operational phase of the development must be compiled and implemented. The NMMP that incorporates comments from all relevant authorities, including this Department's Air Quality Management Directorate, the City of Cape Town and the SACAA must be submitted to this Directorate together with all comments obtained, prior to the commencement of any earthmoving or construction activities.
47. A Service Infrastructure Management Plan must be compiled to, *inter alia*, stipulate the frequency by which service infrastructure will be serviced. These include the sewer- and water treatment plants, bio-digester and sewer conveyance infrastructure. The Service Infrastructure Management Plan must be implemented and must be submitted to this Directorate prior to the commencement of earthmoving- and construction activities.
48. Copies of the following instruments, as approved by the relevant Competent Authorities, must be submitted to this Directorate for record purposes:
 - 48.1. RNP approach procedures;
 - 48.2. Instrument Landing System approach procedures;
 - 48.3. RNAV Standard Instrument Departures; and
 - 48.4. RNAV Standard Instrument Arrivals (standard terminal arrival routes).
49. The following measures adapted from the Socio-Economic Impact Assessment Report (dated 30 May 2025 and compiled by Dr. Jonathan Bloom), must be implemented:
 - 49.1. A Procurement Strategy must be compiled and must be implemented. The Procurement Strategy must be submitted to this Directorate prior to the commencement of earthmoving- and construction activities.
 - 49.2. A Communication Strategy must be compiled and must be implemented. The Communication Strategy must be submitted to this Directorate prior to the commencement of earthmoving- and construction activities.
 - 49.3. A Social Engagement Plan, formal monitoring systems and contingency plans to deal with any larger-than-expected in-migration must be prepared by a suitably qualified person to assist with the management of jobseekers and community business forums and must be implemented. The Social Engagement Plan must be submitted to this Directorate prior to the commencement of earthmoving- and construction activities.
 - 49.4. A lighting audit must be conducted by the appointed ECO at the end of the construction phase of each precinct (excluding the Agricultural Precinct) to ensure that all lighting-related mitigation measures are adhered to and successfully implemented. A copy of the lighting audit report must be submitted to this Directorate.

F. RECOMMENDATIONS

1. The holder of the Environmental Authorisation should, within six (6) months from the date of issue of this Environmental Authorisation, initiate consultation with the CapeNature Advisory Panel to ensure that the Biodiversity Offset Site is transferred into stewardship through a formal Stewardship Agreement with CapeNature after the conclusion of the 30-year management period of the biodiversity offset site.

2. The holder should thereafter provide this Directorate with a status report every six (6) months until the Stewardship Agreement or contract has been finalised.
3. The holder should submit the final Stewardship Agreement or contract to this Directorate within thirty (30) days after it has been finalised, for record purposes.

G. GENERAL MATTERS

1. Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the Listed Activities.
2. Non-compliance with any Condition of this Environmental Authorisation or any provision of the EMPr may render the holder liable for criminal prosecution.
3. If the holder does not commence with the Listed Activities within the period referred to in Condition 2, this Environmental Authorisation shall lapse. If the holder wishes to extend the validity period of the Environmental Authorisation, an application for amendment in this regard must be lodged with the Competent Authority prior to the expiry date.
4. An application for amendment of the Environmental Authorisation must be submitted to the Competent Authority where any detail with respect to the Environmental Authorisation must be amended, added, substituted, corrected, removed or updated. If a new holder is proposed, an application for Amendment in terms of Part 1 of the EIA Regulations, 2014 (as amended), must be submitted.
5. Please note that an amendment of the Environmental Authorisation is not required for a change in the contact details of the holder. In such a case, the Competent Authority must only be notified of such changes.
6. The manner and frequency for updating the EMPr must be made in accordance with Regulations 35 to 37 of GN No. R.982 (as amended) or any relevant legislation that may be applicable at the time.

H. APPEALS

Appeals must comply the National Appeal Regulations, 2025 (Government Notice No. R. 5985 in Government Gazette No. 52269 of 13 March 2025). Please note the provisions of Regulations 1 (2) and (3) of the National Appeal Regulations, 2025 when calculating the period of days.

1. The holder (applicant) of this decision must submit an appeal to the Appeal Administrator, any registered I&APs and the decision maker (Competent Authority who issued the decision) within twenty (20) calendar days from the date this Decision was sent by the decision maker.
2. The I&APs (not the holder of this Decision) must submit an appeal to the Appeal Administrator, the holder (applicant) of the Decision and the decision maker within twenty (20) calendar days from the date this Decision was sent to the registered I&APs by the holder (applicant) of the decision.
3. All appeals submitted must:
 - a. be in writing in the appeal form obtainable from the Departmental website;
 - b. include supporting documents referred to in the appeal; and
 - c. include proof of payment of the prescribed non-refundable appeal fee, if prescribed.
4. The holder (applicant) of the decision must:
 - a. notify registered I&APs and affected organs of state of any appeal received, and make the appeal available to them, within five (5) calendar days after the 20-day appeal period ends.

- b. Submit proof of this notification to the Appeal Administrator within five (5) calendar days after sending the last notification.
5. The applicant, where applicable, the decision-maker, or any person notified under Regulation 4 of the National Appeal Regulations, 2025 may submit a Responding Statement within twenty (20) calendar days from the date they received the appeal, in the form obtainable from the Department website to the Appeal Administrator and to the appellant, where the appellant is not the applicant.
6. Appeals, Responding Statements and supporting documents must be submitted to the Appeal Administrator by means of one of the following methods:
 - a. By e-mail:
DEADP.Appeals@westerncape.gov.za or
 - b. By hand where that person submitting does not hold an electronic mail account:
Attention: Mr Marius Venter
Room 809, 8th Floor Utilitas Building,
1 Dorp Street, Cape Town, 8001

Note: You are also requested to submit an electronic copy (Microsoft Word format) of the appeal, responding statement and any supporting documents to the Appeal Administrator via email or to the address listed above.

A prescribed appeal form, responding statement form as well as assistance regarding the appeal processes is obtainable from the relevant website of the Appeal Authority: <http://www.westerncape.gov.za/eadp> or the office of the Minister at: Tel.: (021) 483 3721 or email: DEADP.Appeals@westerncape.gov.za

I. DISCLAIMER

The Western Cape Government, the Local Authority, committees or any other public authority or organisation appointed in terms of the conditions of this Environmental Authorisation shall not be responsible for any damages or losses suffered by the holder, developer or his successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.

Your interest in the future of our environment is greatly appreciated.

Yours faithfully

Zaahir Toefy Digitally signed by Zaahir Toefy
Date: 2025.10.27 21:21:19
+02'00'

MR. ZAAHIR TOEFY
DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)
WESTERN CAPE GOVERNMENT: ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

DATE OF DECISION: 27 OCTOBER 2025

Copied to:

- (1) Ms. Amanda Fritz-Whyte (PHS Consulting)
- (2) Mr. Paul Slabbert (PHS Consulting)
- (3) Ms. Sonja Warnich-Stemmet (City of Cape Town)

E-mail: amanda@phsconsulting.co.za

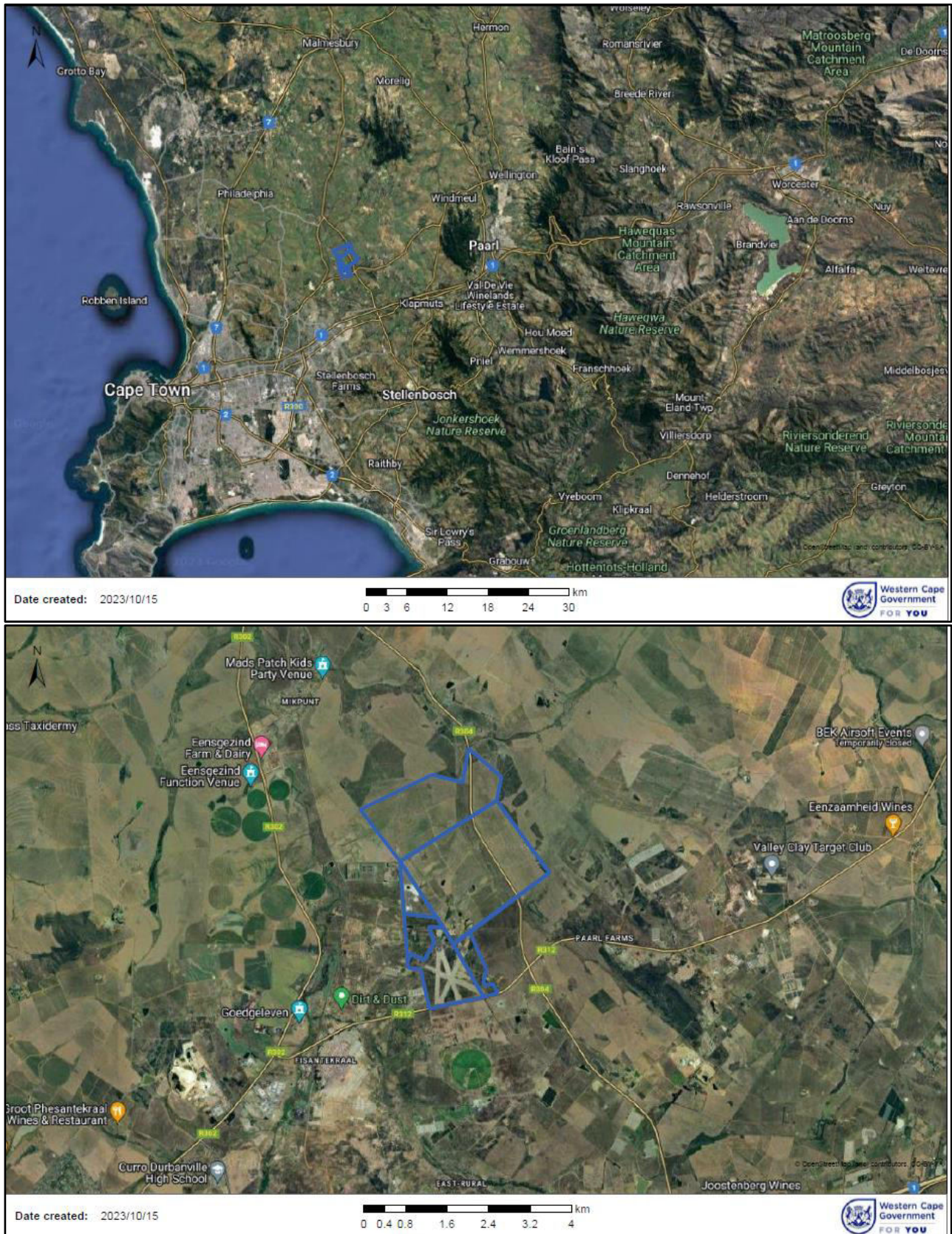
E-mail: paul@phsconsulting.co.za

E-mail: sonja.warnichstemmet@capetown.gov.za

FOR OFFICIAL USE ONLY:

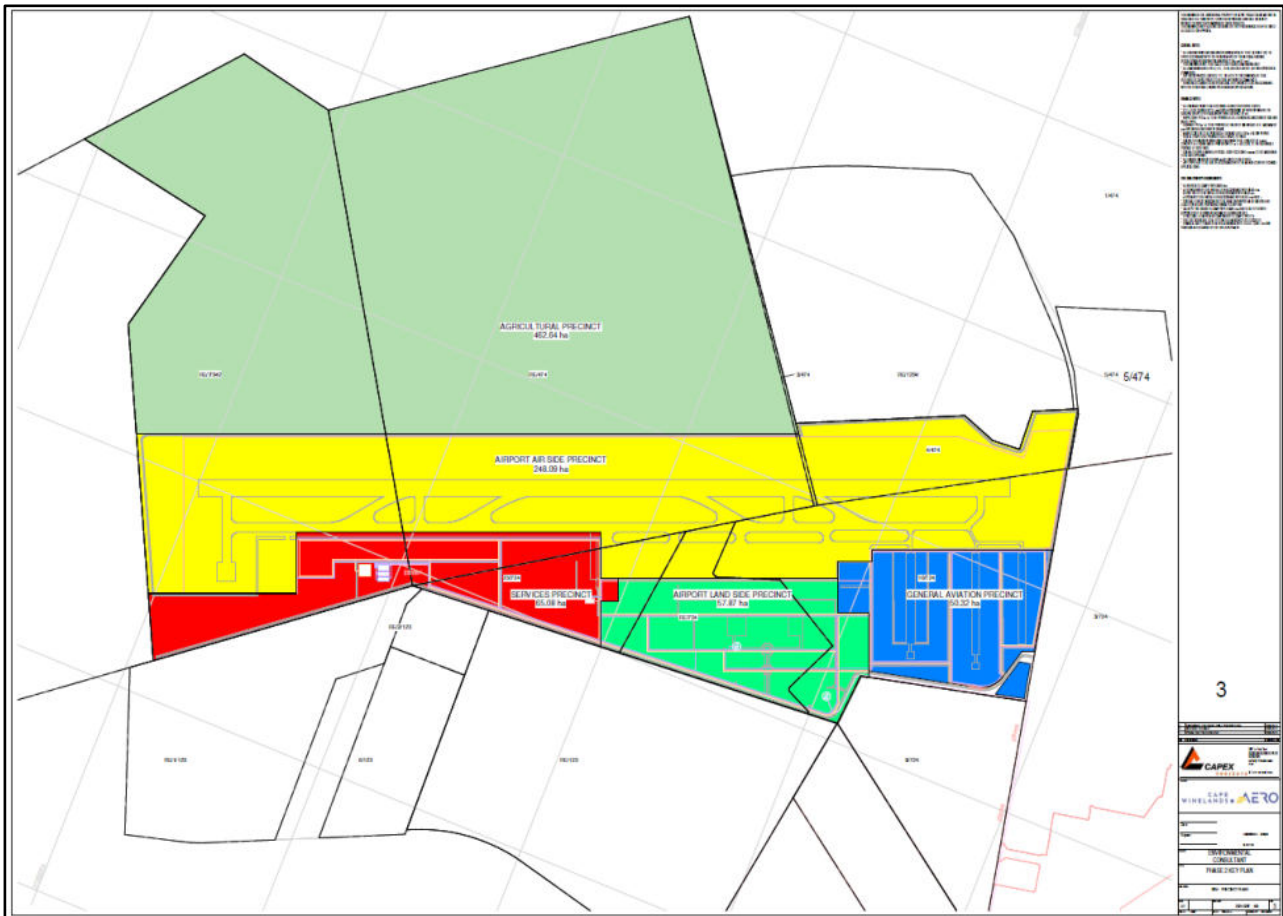
EIA REFERENCE: 16/3/3/2/A5/20/2046/24
NEAS REFERENCE: WCP/EIA/0001497/2024

ANNEXURE 1: LOCALITY MAPS

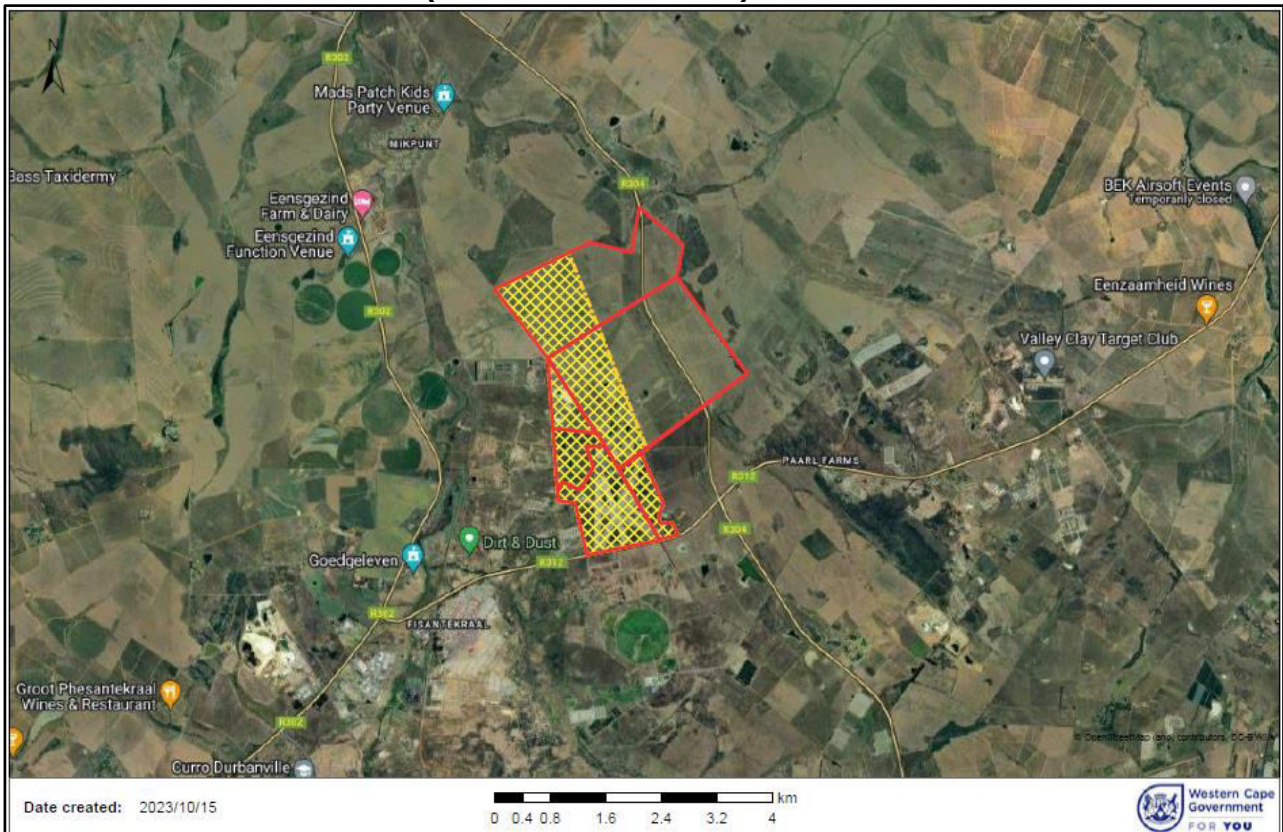


ANNEXURE 2: THE SPATIAL PLANS

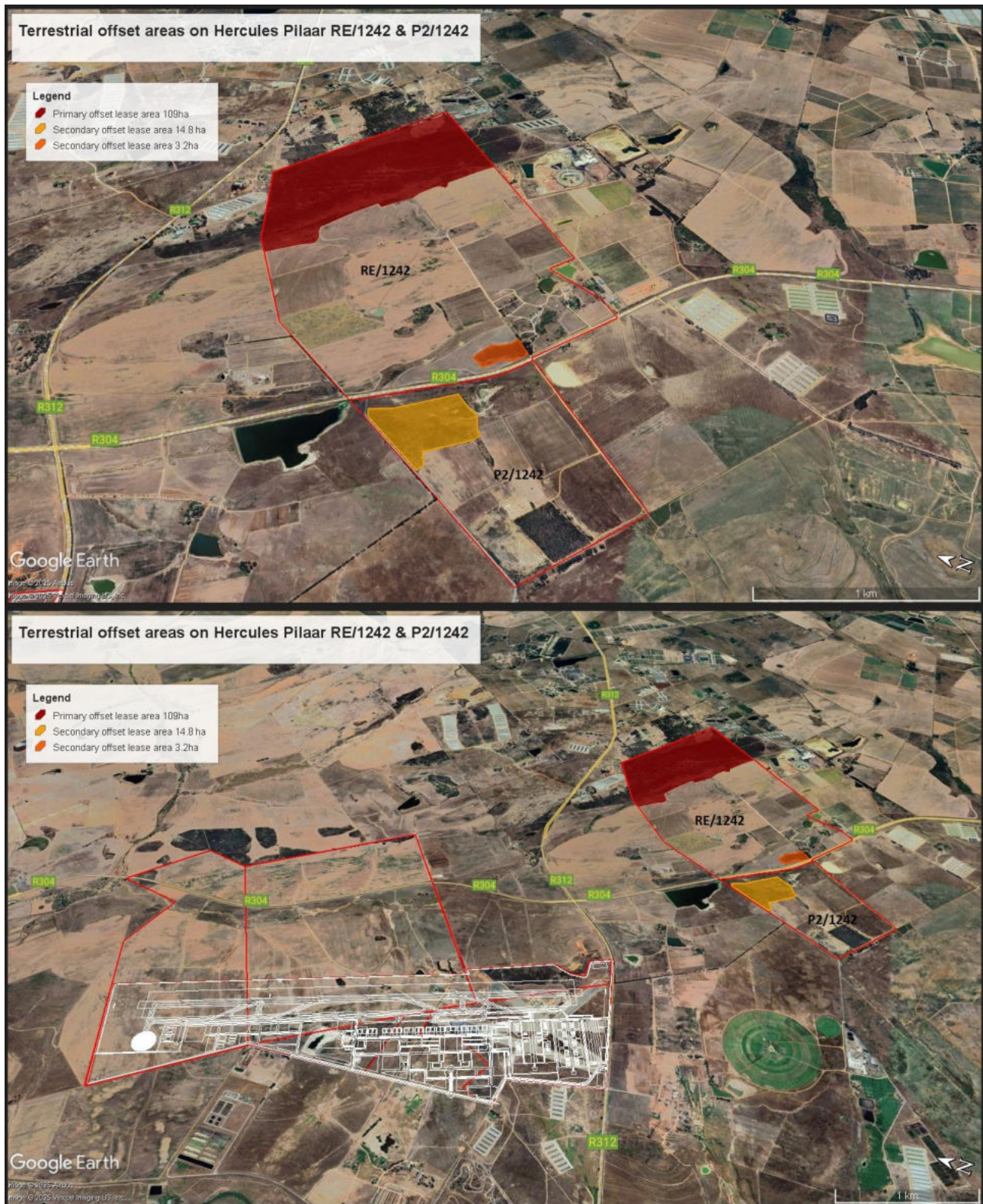
THE PRECINCT PLAN



THE DEVELOPMENT AREA LAYOUT (HATCHED YELLOW AREA)



ANNEXURE 3: Biodiversity Offset Maps



ANNEXURE 4: REASONS FOR THE DECISION

In reaching its decision, the Competent Authority considered, *inter alia*, the following:

- a) The information contained in the Application Form received by this Directorate via electronic on 23 July 2024, the final Scoping Report and Plan of Study received by this Directorate on 6 September 2024, the final EIA Report received by this Directorate on 11 July 2025, the EMP (dated July 2025) and all supporting information.
- b) Relevant information contained in the Departmental information base, including the Guidelines on Public Participation, Need and Desirability and Alternatives (dated March 2013);
- c) The objectives and requirements of relevant legislation, policies and guidelines, including section 2 of the NEMA;
- d) The comments received from I&APs and the responses thereto, included in the final BAR; and
- e) The balancing of negative and positive impacts and proposed mitigation measures.
- f) A site visit was conducted by Mr. Zaahir Toefy (Competent Authority), Officials of the Directorate: Development Management (Region 1) Ms. Natasha Bieding and Ms. Shameemah Heugh, Mr. Deon Cloete (Capewineland Aero (Pty) Ltd), Ms. Adele Klingenberg (existing CWA) and Mr. Paul Slabbert and Ms. Amanda Fritz-Whyte (PHS Consulting) on 22 October 2025.

All information presented to the Competent Authority was taken into account in the consideration of the application for Environmental Authorisation. A summary of the issues that were considered to be the most significant for the decision is set out below.

1. Public Participation

The Public Participation Process ("PPP") included the following:

Pre-Application Phase

- Notification letters were sent to neighbouring landowners via email on 7 November 2023;
- Surrounding (adjacent) landowners, key I&APs and authorities were notified and engaged during the PPP via email on 7 November 2023;
- Landowners were asked to notify their tenants of the proposal and the commenting period on 7 November 2023 (via letter attached to email);
- The relevant Ward Councillors were consulted on 7 November 2023 (via email) and remained registered on the database of I&APs;
- Written notifications sent via email to the Municipal Ward Councillors on 7 November 2023;
- A public meeting was held on 8 May 2024 at the Fisantekraal Community Hall;
- The project team, including the EAP, attended a meeting with the Durbanville Farmers Association on 4 June 2024 during which the EAP was requested to present on the proposed development;
- English and isiXhosa advertisements were placed in the 'Tygerburger' Newspaper (Durbanville) on 8 November 2023;
- An Afrikaans advertisement was placed in 'Die Burger' Newspaper on 8 November 2023;
- An English advertisement was placed in 'The Cape Times' Newspaper on 8 November 2023;
- Three notices in English, Afrikaans and isiXhosa were placed at three locations on or near the site on 8 November 2023;
- The pre-application Scoping Report and supporting documentation was made available for a minimum commenting period of thirty (30) days from 8 November 2023 to 8 December 2023. All late I&AP registration and comments were accepted and incorporated in the I&AP register and included in the Comments and Responses Report;
- A hard copy of the Scoping Report was placed at the Fisantekraal Public Library for public viewing on 8 November 2023;
- A site notice was pinned on the Fisantekraal Public Library notice board on 8 November 2023; and
- A public meeting was held on 8 May 2024 in Fisantekraal.

Matters raised in the comments received during the abovementioned PPP include the following:

- The site requires a closure certificate regarding the existing quarry;
- Requests to be registered as I&APs;
- Objections against the development proposal;
- Traffic congestion and infrastructure constraints due to the proposed airport expansion;
- Noise pollution;
- Impacts of air quality and emissions;
- Impacts on the ecology of wetlands must be considered;
- Negative impacts on the Garden Cities Development;
- Liaising with the relevant and Competent Authorities;
- Associated impacts on the Cape Town International Airport ("CTIA") from an aviation and sustainability perspective;
- Light pollution;
- Air pollution;
- Noise pollution;
- The applicability of municipal forward planning policies;
- The municipal bulk services and other associated infrastructure requirements;
- Further considerations required in terms of the biodiversity related impacts;
- The need for community meetings and engagements;
- Support of the proposed development;
- Impacts on the local and surrounding residents and receiving environment; and
- The need for robust assessments by accredited persons.

Draft Scoping Application Phase

- Copies of the draft Scoping Report were made available for a minimum commenting period of thirty (30) days from 24 July 2024 to 26 August 2024;
- Registered I&APs and commenting authorities were notified of the availability of the draft Scoping Report on 23 July 2024;
- Focus group meetings were held on 16 August 2024 (Fisantekraal community leaders), 17 August 2024 (Durbanville Heritage Society) and 22 August 2024 (CoCT Noise and Air Quality), respectively;
- A hard copy of the draft Scoping Report was placed at the Fisantekraal Public Library on 23 July 2024;
- A site notice was pinned on the Fisantekraal Public Library notice board on 23 July 2024;
- An advertisement in English in the 'Tygerburger' Newspaper on 24 July 2024; and
- Three site notices in English, Afrikaans and isiXhosa were placed at three locations on or near the site on 23 July 2024.

Matters raised in the comments received during the abovementioned PPP include the following:

- Extension requested on the deadline for providing comment on the Scoping Report;
- Need and viability of a second commercial international airport;
- Security of fuel supply for the CWA expansion;
- The CWA expansion not having been considered in terms of government policy(s);
- Airspace design requirements;
- The impact of CWA expansion on the future development of the CTIA;
- Inadequacies of the Concept of Operations Study;
- A more detailed study regarding the CTIA versus CWA expansion airspace is required;
- Impacts on the operations of the 'Westelike Provinsie Oesbespuiting Maatskappy';
- Requests to be registered as an I&AP;
- Traffic impacts on the local roads;
- Noise pollution;
- Civil Aviation Regulations with respect to bird/wildlife strike prevention programme and other applicable requirements to be met;
- Objections to the proposal;
- Impacts on existing aviation facilities in Stellenbosch;
- Noise impact, including noise contours;
- Impacts on airspace and inadequacies in the Airspace Conops Report;
- Impacts of noise, pollution, congestion and crime on Mikipunt resident(s);
- Accreditation of specialists;
- Impacts on rural living;

- Impacts on wildlife;
- Insufficiency of certain specialists studies;
- Negative impacts on the local residents;
- Transparency in public participation required;
- Concerns and impacts on the County Fair poultry farm;
- Need for an alternative location;
- Impacts on the Bella Riva development;
- Aquatic related impacts;
- The relevance of the strategic and Municipal context of the receiving area;
- Impacts on the surrounding areas;
- Impact on communications infrastructure (masts); and
- General support and requests to form partnerships with the expanded airport.

Draft EIA Phase

- Copies of the draft EIA Report were made available for minimum commenting period of thirty (30) days from 13 November 2024 to 13 December 2024;
- An extension on the above comment period was granted until 13 January 2025;
- A public open day was held on 20 November 2024;
- Registered I&APs and commenting authorities were notified of the availability of the draft EIA Report on 13 November 2024;
- An advertisement in English was placed in the 'Tygerburger' Newspaper on 13 November 2024;
- Three site notices in English, Afrikaans and isiXhosa were placed at three locations on or near the site on 13 November 2024;
- A hard copy of the draft EIAR was placed at the Fisantekraal Public Library on 13 November 2024; and
- A site notice was pinned on the Fisantekraal Public Library notice board on 13 November 2024.

Matters raised in the comments received during the abovementioned PPP include the following:

- What the flight paths for landings and departures will be;
- Noise impacts and pollution;
- Increased fire risks;
- Impact on existing farming practices and areas;
- Increased air traffic over local properties;
- Objections against the development proposal;
- Air quality emissions at the CTIA that can be incorporated into the Air Quality Impact Assessment and modelling;
- Assessment of individual case studies regarding existing airports;
- Support for the development proposal;
- Inadequate time to provide comments and have public participation processes underway;
- The transport and traffic related requirements to be adhered to;
- Impact on property values;
- Request for extension of the PPP;
- Impacts on the existing Greenville residential development;
- Impacts on the local area's poultry operations;
- Desirability of the CWA expansion in the context of existing local aviation sector raised by the Airports Company South Africa; and
- Safety and security resulting from the CWA expansion.

Revised draft EIA Phase

- Copies of the revised draft EIA Report were made available for a longer commenting period of 45 days from 19 March 2025 to 13 May 2025;
- Registered I&APs and commenting authorities were notified of the availability of the draft EIA Report on 19 March 2025;
- English and isiXhosa advertisements were placed in both the Durbanville and the Kraaifontein editions of the 'Tygerburger' Newspaper on 19 March 2025;
- An Afrikaans advertisement was placed in the 'Die Burger' Newspaper on 19 March 2025;

- Three site notices in English, Afrikaans and isiXhosa were placed at three locations on or near the site on 18 March 2025;
- A hard copy of the amended EIA Report was placed at the Fisantekraal Public Library on 19 March 2025;
- A site notice was pinned on the Fisantekraal Public Library notice board on 19 March 2025;
- A second public open day was held on 15 April 2025 at the Goedgeleeven Venue, Klipheuwel Road, Durbanville ;
- The CWA expansion project team participated in the Paardeberg Sustainability Initiative's Farmer's Day on 20 March 2025 where they delivered a presentation followed by a Question and Answer session; and
- A focus group meeting was held on 15 April 2025 with an I&AP who operates a parrot sanctuary in Mikpunt.

Matters raised in the comments received during the abovementioned PPP include the following:

- Potential negative impacts on the local area, including Durbanville and Fisantekraal;
- Support for the proposal;
- How the local road network will be affected;
- Traffic impacts;
- Noise impacts;
- Air pollution;
- Impacts on local agricultural areas and operations;
- Further requirements must be met in terms of the landuse applications and air emissions licence;
- The impacts on the County Fair poultry farm property due to operations of the development proposal;
- Need and desirability of development proposal;
- Inadequacy of alternatives considered;
- Specific biodiversity offset requirements;
- Objection against the development proposal; and
- Impacts on the CTIA by the CWA expansion, as proposed second airport in Cape Town.

Proof of having responded to all of the abovementioned matters raised, including objections, have been included in the Comments and Response Report that was submitted together with the final EIA Report. In certain instances, the abovementioned matters raised resulted in either adjustments being made to the development proposal or additional studies being commissioned and the recommendations thereof incorporated into the development proposal and included in subsequent reports that were circulated for further comments.

Additionally, consideration was given to comments and feedback that was received after the conclusion of the abovementioned commenting periods.

On 16 July 2025, an email notification was sent to all registered I&APs, stakeholders and authorities to inform them of the fact that the final EIA Report and supporting documentation was submitted to the Competent Authority.

Additional PPP related measures included the following:

- A hard copy of the final EIA Report and supporting documentation was placed at the Fisantekraal Public Library on 16 July 2025;
- A site notice was pinned on the Fisantekraal Public Library notice board on 16 July 2025;
- On 4 August 2025, updated information was placed on the PHS Consulting Website as well as placed at the Fisantekraal Public Library; and
- On 10 September 2025, a document on the late comments received (addendum to Appendix 29D) was posted on the PHS Consulting Website, and a hard copy was placed at the Fisantekraal Public Library on 12 September 2025.

Matters raised after the final EIA Report was submitted to the Competent Authority include the following:

- Further clarification regarding the local airspace impacts;
- Where previous objections against the proposal can be viewed;

- The proposed flight path and options for air traffic arriving and departing the expanded airport;
- Impacts of flight paths on the Paardeberg Conservancy;
- Support for the development proposal; and
- How the site will be powered (electricity).

The EAP provided proof of having noted and acknowledged the abovementioned matters raised, even if such matters were raised after the legislated PPP commenting period ended. In this regard that EAP also further confirmed that the expanded airport's will not directly impact the Paardeberg Conservancy.

Relevant State Departments and Organs of State consulted during the abovementioned PPPs include the following:

- CapeNature;
- City of Cape Town;
- Heritage Western Cape;
- West Coast District Municipality;
- Western Cape Government: Mobility;
- Western Cape Government: Agriculture;
- Western Cape Government: Infrastructure;
- Western Cape Government: Environmental Affairs and Development Planning (various Directorates);
- National Department of Water and Sanitation;
- National Department of Mineral Resources and Energy; and
- National Department of Agriculture, Land Reform and Rural Development.

Furthermore, the following Stakeholders have been invited to participate during one or more of the abovementioned PPPs:

- Eskom;
- Transnet;
- Paardeberg Conservancy;
- Birdlife South Africa; and
- The Passenger Rail Agency of South Africa.

It should be further noted that whilst the proposed development falls within the City of Cape Town municipal boundary, municipalities from outside the City of Cape Town municipal boundary were also invited to provide inputs and comments during the abovementioned PPPs. These municipalities are the Drakenstein Municipality, Stellenbosch Municipality, Swartland Municipality and Cape Winelands Municipality. No objections nor substantive comments were provided from the said Municipalities.

All responses submitted after the abovementioned PPPs concluded were made available to the Competent Authority and included in the Comments and Responses Reports.

The Directorate is satisfied that the PPP that was followed met the minimum legal requirements. In addition to the minimum PPP requirements having been met, is further noted that various stakeholder engagements, a public open day and focus group meetings were hosted during the scoping and EIA application process as well as extensions granted during specific PPPs in response to extension requests received from I&APs.

Specific management and mitigation measures have been considered in this Environmental Authorisation and in the provisions of the EMPr to address any significant concerns raised.

2. Alternatives

Scoping Phase:

Early during the scoping phase of the application process, three Alternatives were identified and considered, *namely*; (a) one Location Alternative (*i.e.*, the expansion of the existing CWA), (b)

the 'No-Go' Alternative (*i.e.*, no expansion of the existing CWA), and (c) the Preferred Alternative (*i.e.*, the expansion of the existing CWA), were considered.

Only the 'No-Go' Alternative and the Preferred Alternative were further assessed during the EIA phase of the application process. Based on the assessment of impacts during the EIA phase, additional changes were made to the Preferred Alternative. These changes include, *inter alia*, the following:

- (a) The removal of the cross runway;
- (b) Exclusion of the chicken manure to the biodigester;
- (c) Exclusion of the wind energy options;
- (d) Inclusion of both sewer to on-site treatment as well as servicing via the Fisantekraal WWTW;
- (e) Inclusion of additional boreholes to be drilled;
- (f) Inclusion of an incoming potable line from the southwest;
- (g) Extension of the fuel line into the General Aviation Precinct area; and
- (h) Minor amendments to internal precinct boundaries.

These changes resulted in a new Preferred Alternative 4 (discussed below, as Alternative 2), which was further assessed during the EIA phase.

The reasons for only assessing one Location Alternative is based on the following reasons:

- Land availability, shape and size (the necessary land has been secured);
- The consideration of technical and operational requirements, *inter alia*, suitable terrain, absence of geographical obstructions, suitable meteorological conditions, it being possible to integrate with existing air traffic patterns, and the presence of adequate geotechnical requirements for runway construction;
- Connectivity, *i.e.*, good proximity to major roads and rail infrastructure, accessibility and proximity to urban centres;
- Regulatory and legal considerations, *namely*; existing zoning for the use of the site for airport operations and aviation policy whereby the proposed airport will financially be self-sustaining and privately funded;
- The applicable environmental and ecological factors, *inter alia*, site's positioning to safeguard operations whilst minimising noise-related disruptions, proper site drainage due to the elevated ridge present, presence of boreholes for water supply and easy integration into municipal service infrastructure network, the site's location outside of the exclusion zoned, including the Koeberg Nuclear Power Station zones; and
- Economic and financial considerations, *namely*; lower development costs will ensue when compared to developing a greenfield site and the potential to serve as a cost-efficient alternate airport option in terms of diversion planning and fuel contingencies.

The 'No-Go' Alternative, *i.e.*, no expansion of the existing CWA, has been considered during the scoping phase.

EIA Phase:

During the EIA phase, Alternative 1 (the 'No-Go' Alternative), Alternative 2 (the phased expansion of the CWA, which omits a short crosswind runway and includes further adjustments made, including *inter alia*, (1) the fuel line extending into the General Aviation Precinct, (2) amending the internal precinct boundaries, (3) the usage of 3 boreholes, and (4) the installation of an incoming potable line), and Design/Technology Alternatives were assessed.

Alternative 1 (Rejected)

The 'No-Go' Alternative entails no expansion of the existing CWA 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 taking place. This means that the 'status quo' is maintained, *i.e.*, the current aviation activity at the airport consisting of flight school operations and other unscheduled general aviation flights will continue.

The Alternative 1 ('No-go' Alternative) was rejected, since it will mean that the site will not be able to fulfil its identified strategic roles within the City of Cape Town's air travel market in terms of the following:

- The City of Cape Town's second commercial airport offering scheduled airline services for domestic and international passenger and cargo operations;
- Alternate Airport for diversion and fuel planning purposes, enabling significant efficiencies for the airline sector;
- General Aviation Airport for domestic and international, unscheduled, and private operations;
- Reliever Airport, adding redundancy and diversion capability for aircraft in the region;
- Logistics Hub catalysing multi-modal commercial activity in the region and stimulating economic growth; and
- Commercial Property Developments stimulated and enabled by the above.

Alternative 2 (Preferred and Herewith Authorised)

Alternative 2 entails the expansion of the existing CWA, comprising of the development of five precincts, one of which will be the Agricultural Precinct. The remaining four precincts, *namely*; the Services Precinct, the Airside Precinct, the Terminal Precinct, and the General Aviation Precinct, will be developed in two distinct phases. After the implementation of Phase 1 stipulated below, Phase 2 will evolve in response to market demand.

Phase 1:

- An Agricultural Precinct, measuring approximately 462ha in extent, comprises the continuation of the existing agricultural component. This Precinct includes the construction of the following:
 - existing main access roads and internal farm roads left unchanged;
 - areas of intact vegetation respected as 'no-go' areas for conservation;
 - establishment of the required firebreaks;
 - establishment of wetland rehabilitation;
 - establishment of designated wetland offset areas;
 - construction and installation of associated stormwater infrastructure; and
 - fence line on the outer perimeter and a shared security fence line with the Airside precinct.
- A Services Precinct, measuring approximately 65ha, which will include the construction of the following:
 - a maintenance repairs and operational hanger;
 - an aircraft sanitary station;
 - an airport maintenance facility/area;
 - a catering building;
 - a Ground Support Equipment ("GSE") staging and maintenance facility;
 - a Fuel farm;
 - a cargo terminal;
 - an Aircraft Rescue and Firefighting facility;
 - an Operations Centre ("OPS");
 - an Air Traffic Control centre;
 - an Eskom incoming and Substations;
 - a groundwater and potable water treatment facility and storage area;
 - a water pump station;
 - a non-potable treatment facility and storage area;
 - a solid waste area;
 - a firefighting water pump station;
 - areas for airport use; and
 - internal road and services configuration.
- An Airside Precinct, measuring approximately 249ha, which will include the construction of the following:
 - a primary runway of measuring approximately 3.5km in length at an orientation of approximately 01-19 and taxi ways;

- Solar Photovoltaics ("PV") ;
 - airport parking;
 - a maintenance repairs and operations apron;
 - a cargo apron;
 - an Eskom incoming and substation;
 - a Remote Digital Control Tower System;
 - Localizer, Glidepath antennae, and Precision Approach Path Indicator ("PAPI");
 - Runway End Safety Areas ("RESA") areas around the runway and taxi lanes;
 - Landscaping;
 - firebreaks;
 - establishment of conservation areas;
 - establishment of re-vegetated areas; and
 - internal road and services configuration.
- A Terminal Precinct, measuring approximately 57ha, which will include the construction of the following:
 - landscaping;
 - a passenger terminal building;
 - a car rental and public transport;
 - parking, pick up and drop off area
 - GSE staging;
 - cargo;
 - an energy centre and aircraft sanitary station;
 - a land side substation ("LSS");
 - a hotel;
 - various areas for airport use;
 - aero vintage;
 - restaurants;
 - a petrol and diesel service station;
 - access roads, internal roads and associated infrastructure; and
 - Internal road and services configuration.
- A General Aviation Precinct, measuring approximately 50ha, which will include the construction of the following:
 - a General Aviation/VIP/Government terminal;
 - parking
 - fixed base operators
 - General Aviation hangars
 - a General Aviation Clubhouse and fueling facility;
 - a special cargo facility;
 - an OPS (Operations Centre);
 - access control areas;
 - areas for airport use;
 - a heliport;
 - internal road and services configuration; and
 - signage and billboards.
- Associated infrastructure and components which will include the construction of the following:
 - a sewage pipeline leading to the Fisantekraal Waste Water Treatment Works ("WWTW");
 - a potable waterline;
 - on-site stormwater infrastructure;
 - an Eskom line;
 - access roads and alignment;
 - Solar PV (on buildings);
 - perimeter fencing; and
 - firebreaks.

Phase 2:

- Continued use of the abovementioned Agricultural Precinct, comprising of the following:
 - areas of intact vegetation for conservation purposes;
 - firebreaks;
 - wetland rehabilitation;
 - wetland offset;
 - existing agricultural areas remaining intact;
 - existing access roads remaining;
 - stormwater infrastructure;
 - a fence line; and
 - a shared security fence line with the Airside precinct.
- Continued use of the abovementioned Services Precinct, which will include the construction of the following:
 - groundwater containment and treatment measures;
 - sewage containment and treatment;
 - containment of treated sewage water (inclusive of emergency storage) and pumpstation;
 - a solid waste area
 - a biodigester (using grass feedstock and treated sewage water);
 - Eskom incoming and LS substation;
 - a firefighting water pump station
 - an Aircraft sanitary station;
 - maintenance, repair, and overhaul ("MRO") hangar;
 - a maintenance area;
 - a parking area;
 - a catering building;
 - GSE maintenance and staging area;
 - a fuel farm and underground fuel line
 - a substation
 - a cargo terminal;
 - Aircraft Rescue and Fire Fighting ("ARFF");
 - an OPS (Operations Centre);
 - an Air Traffic Control Tower
 - an Existing quarry to be used for stormwater retention;
 - internal road and services configuration; and
 - landscaping.
- Continued use of the abovementioned Airside Precinct, which will include the construction of the following:
 - a 3.5km long runway;
 - taxi areas;
 - solar PV;
 - aircraft parking;
 - an MRO apron;
 - a cargo apron;
 - Eskom incoming and substations;
 - a Remote Digital Control Tower System ("RDTS")
 - a PAPI;
 - internal road and services configuration;
 - an underground fuel line;
 - RESA areas around the runway and taxi lanes
 - landscaping;
 - firebreaks;
 - conservation areas; and
 - re-vegetated areas.
- Continued use of the abovementioned Terminal Precinct, which will include the construction of the following:
 - landscaping;

- a passenger terminal building;
 - a car rental and public transport facility;
 - a parking, pick up and drop off facility;
 - pier expansion reservation;
 - a terminal reserve;
 - GSE staging area;
 - Cargo area;
 - an energy centre and aircraft sanitary station;
 - an LS SS (Land Side Substation);
 - two (2) hotels;
 - airport use area;
 - aero vintage;
 - restaurants
 - a service station; and
 - internal road and services configuration.
- Continued use of the abovementioned General Aviation Precinct, which will include the construction of the following:
 - General Aviation/VIP/Government Terminal;
 - parking;
 - fixed base operators;
 - General Aviation Hangers;
 - General Aviation clubhouse and fueling;
 - a special cargo facility;
 - an OPS (Operations Centre);
 - an access control facility;
 - transport use area;
 - airport use, i.e., associated buildings and facilities and uses supplementary to the runway use;
 - heliport;
 - internal road and services configuration; and
 - landscaping.

The total development footprint amounts to approximately 883ha in extent.

It was confirmed in the final EIA Report (dated July 2025) that Alternative 2 (Preferred and Herewith Authorised) has been revised to include additional components based on comments received from I&APs and Organs of State. The additional components include, (1) the extension of the fuel line into the General Aviation Precinct, (2) the amendment to the boundaries of the Internal Precinct, (3) the provision of three (3) boreholes, (4) the addition of an incoming potable line, and (5) the omission of the short cross-runway initially proposed.

Technology Alternative related to Energy – Solar and Biodigester versus Eskom Supply

The Biodigester Plant comprises of the feed stream using treated effluent from the new WWTW, cultivated biomass/energy crop as well as organic waste from the site. The system will be designed to provide approximately 1 Mega Watt ("MW") of continuous power.

The Solar PV installation will generate more than 20MW but less than 100MW of renewable energy. The Solar PV installed power sources will be integrated onto the site micro-grid electrical infrastructure using the planned medium voltage distribution network.

Bulk electrical supply will be connected to the Eskom Grid via a 66,000-Volt overhead powerline to be undertaken in a phased approach.

The Eskom power supply will provide backup supply on site to the solar/biodigester energy supply, which is the preferred technology alternative and approach, since the use of a Biodigester Plant and Solar PV installation will reduce reliance on Eskom power supply.

Technology Alternative related to Waste Management – Disposal to landfill versus Biodigester

Waste generated from on-site operations will include general and recyclable waste, which will be separated at source. Recyclable waste will be disposed to a local transfer station or by pickup from licensed waste operators.

General and hazardous waste will be disposed to landfill with transfer by road. Waste will be stored on site for a short period before collection and disposal to landfill.

Technology Alternative related to wastewater treatment and management – on site treatment versus disposal into the CoCT sewer network

Various options were considered, including installation of a pumpstation and associated rising main that conveys the flows directly to Fisantekraal WWTW or the construction of an on-site wastewater treatment plant.

The preferred Technology Alternative entails the construction of an on-site package treatment plant to treat wastewater for non-potable water use on the site. The remaining sewage will be directed to the nearby municipal WWTW for further treatment and disposal.

This is the preferred Technology Alternative, since it aims to optimise effluent reuse, reduce pressure on the WWTW, as well as address environmental concerns with respect to excess treated effluent generated.

3. Impact Assessment and Mitigation Measures

3.1 Need and Desirability

The site is located approximately 40km from the City of Cape Town's Central Business District with linkages to areas located within the neighbouring Municipalities, *i.e.*, Drakenstein Municipality, (Wellington and Paarl), Swartland Municipality (Malmesbury), and Stellenbosch Municipality. The site is therefore well positioned, since it enables future connectivity and new tourism nodes within the broader region. The newly expanded CWA is projected to be 'multifaceted' in that it will provide a number of services within the aviation sector and stimulate associated spinoff industries.

Services within the aviation sector that will be provided include the following:

- Scheduled Airline Services for domestic and international passenger- and cargo operations;
- General Aviation for domestic and international, unscheduled, and private operations;
- Alternate Airport for fuel planning purposes and environmental savings;
- Reliever Airport, adding redundancy and diversion capability for aircraft in the region;
- Logistics Hub catalysing multi-modal commercial activity in the region and stimulating economic growth; and
- Commercial Property Developments stimulated and enabled by the above.

Beneficial spinoffs include the provision of employment opportunities during both the construction- and operational phases. Associated industries and commercial activities that will be stimulated by the development proposal include, *inter alia*, fixed based operations, private charter, recreational flying, flight training, helicopter, fire and rescue, aircraft MRO, aircraft assembly and manufacture, hotel, conferencing and events, retail, food and beverage, warehousing, logistics and freight.

The site's location will help enable the newly expanded CWA to serve as a multi-modal transport hub due to road, rail, and air connectivity, with the aims of fulfilling several key roles within the aviation sector. These include unlocking new markets whilst enhancing existing ones, and creating further opportunities within the sector, thereby improving the

socio-economic landscape within the region. The expansion of existing CWA into a commercial airport will ultimately assist Cape Town to become a 'Multi-Airport City', enabling new growth opportunities and improving the attractiveness and competitiveness of the region.

The close proximity and connectivity of the site to existing road- and rail networks will allow the expanded CWA to form a synergy between air, road, and rail networks and thereby support a multi-modal approach to transportation. This demonstrates the desirability of the development proposal from a transportation perspective.

The timing of having the existing CWA expanded is adequate in the sense that it will lead to meaningful contribution to the region's economy and accelerate economic growth, attract investment, boost tourism, and improve logistics in the short- and long term. Having a second airport offers a competitive edge, whereby diversified aviation infrastructure caters to multiple aviation needs whilst helping to alleviate capacity constraints and mitigate risks associated with flight diversions and delays that may be experienced by the existing CTIA. Expanding the existing CWA is more time-efficient and cost-effective than building a new airport.

Due to the location of the site, nearby communities such as Fisantekraal and Klipheuwel, which house large numbers of previously disadvantaged persons, will benefit from improved access to an increased diversity of job opportunities and skills acquisition during the construction- and operational phases, thereby reducing their spatial dislocation on the outskirts of the city.

3.2 Regional and Local Planning

The existing airport site, previously known as Fisantekraal Airfield, is zoned Transport I with consent for an airport. The extent of the expanded CWA that falls outside of the existing airport site is zoned Agriculture. The relevant planning approval will be required to appropriately rezone the site in terms of the relevant planning legislation in order to permit the development proposal.

The expanded CWA site is currently zoned, as follows:

Property	Zoning
Portion 10 of the Farm No. 724, Fisantekraal	Transport Zoning I with consent for "Airport"
Remaining Extent of the Farm No. 724, Fisantekraal	Agriculture
Portion 23 of the Farm No. 724, Fisantekraal	Agriculture
Portion 7 of the Farm No. 942, Fisantekraal	Agriculture
Remaining Extent of the Farm No. 474, Fisantekraal	Agriculture
Portion 3 of the Farm No. 474, Fisantekraal	Agriculture
Portion 4 of the Farm No. 474, Fisantekraal	Transport Zoning I with consent for "Airport"

Specific land parcels will retain their designated 'Agriculture' zoning, including its associated farming activities. These land parcels comprise of the Agricultural Precinct, reflected in Annexure 2 above.

The site falls partially outside of the City of Cape Town's Proclaimed Urban Development Edge. In this regard, it could be argued that this is due to the nature and scale of this type of land use, which requires large expanses of land that is usually situated in rural areas or near the outskirts of a city with the least impact on existing urban land uses. This approach is consistent with the Western Cape Land Use Planning Guidelines - Rural Areas (2019), which states that bulk infrastructure installations serve both urban- and rural communities. In the airport context, airports are often located outside existing Urban Areas because of their need for extensive space, unique locational requirements, or potential negative impact on surrounding areas. In this sense, the approach to infrastructure installations in rural areas is to ensure that these essential public installations can function effectively in suitable rural locations.

Since the development proposal represents a private investment to establish a new economic and transport hub, it will contribute to creating and attracting investment that will facilitate economic growth and employment opportunities. The development proposal is therefore broadly consistent with specific spatial strategies, as included in the City of Cape Town's Spatial Development Framework, 2023 ("Municipal SDF"). Deviations from the Municipal SDF are required for, *inter alia*, (a) the proposed runway, the runway safety area and parts of the landside development extending beyond the Urban Development Edge, (b) portions of the site located in 'Areas of Agricultural Significance' and 'Discouraged Growth Areas', and (c) the southeastern portion of site that is located within a designated 'Core Biodiversity Area'. The application to deviate from the Municipal SDF will form part of the landuse application. Further site-specific circumstances for deviation from the Municipal SDF will have to be motivated in terms of the Municipal Planning By-law. The expanded CWA will necessitate amendments to the City of Cape Town Northern District Plan, 2023 and Urban Development Edge in order to permit the development proposal.

The expanded CWA is deemed to be consistent with the Western Cape Provincial Spatial Development Framework, 2014 ("Provincial SDF"), since the development proposal will contribute toward leveraging private sector investment for regional infrastructure, strengthen the Cape Metro economy and drive economic growth and employment. Furthermore, the development proposal will promote urban revitalisation by optimising existing assets, and advance spatial efficiency by promoting economic activity both locally and regionally. Given the nature of the development proposal, inter- and intraregional accessibility will be improved by its air connectivity options to the metro and wider areas.

The overarching policy thrust of the Provincial SDF is to ensure that all major infrastructure investments are aligned with developmental objectives that promote economic growth, sustainability, and social- and spatial justice. Within this context, the expansion of the existing airport can be regarded as a strategic enhancement of regional connectivity, positioned to strengthen the metropolitan transport system. By improving access and logistics capacity in a part of the metropolitan nexus experiencing rapid population growth and urban expansion, the development proposal holds potential to unlock new economic opportunities, support more inclusive patterns of growth, and diversify transport options for the region.

Further to relevant provincial considerations, the draft Provincial Land Transport Framework (2024/25–2028/29) explicitly recognises the expanded CWA, as a strategic initiative. In terms of the Greater Cape Metro Regional Spatial Implementation Framework, 2019 the development proposal directly supports the vision and development concept of the said framework by enhancing regional transport infrastructure and logistics networks.

In terms of the City of Cape Town Integrated Development Plan, 2022-2027 ("Municipal IDP"), the development proposal is consistent with the focus areas of the Municipal IDP, since both indirect and direct investment will be made into the City of Cape Town Metropole. Direct employment will be created for the benefit of the communities in the surrounding areas during both the construction- and operational phases. The development proposal will most notably support the transport sector by delivering additional capacity and unrestricted/uninterrupted air access into the region.

The proposed development is consistent with the focus areas of the City of Cape Town's Inclusive Economic Growth Strategy, 2021 given significant positive economic impacts that it will have, as mentioned below:

- Employment;
- Increased route profitability for existing airlines flying into Cape Town;
- Improved business case for future airlines, considering a new route into Cape Town in the future;
- Increased trade opportunities through the provision of additional air cargo capacity;

- Airport redundancy, ensuring air access into- and from Cape Town (unhindered trade and travel);
- Growth in the Gross Geographic Product ("GGP"); and
- Growth in household income.

3.3 Aquatic: Surface Water

The equally modified Mosselbank River is located 1km west of the site, and the Klapmuts River is located approximately 1.1km north-east of the site.

Two seep wetlands are located within the study area, *namely*; seep wetland 1 located within the central portion of the site and seep wetland 2 located approximately 310m east of the site. Both seep wetlands are both heavily modified, fragmented and comprise of little remaining indigenous vegetation. It is, however, still considered important, as breeding and a foraging habitat for various fauna.

The expanded CWA will ultimately result in the loss of approximately 6.74ha of wetland habitat due to the establishment of the runway over seep wetland 1. Furthermore, stormwater released into seep wetland 1 poses a risk to the ecological functioning of the wetland. As a result, wetland offsetting was warranted to compensate for the residual loss of wetland habitat, ensuring no net loss of wetland functionality. The wetland offset will be implemented in accordance with the requirements put forward by the National DWS. The impact on seep wetland 2 is deemed to be negligible due to its distance from the site and the release of stormwater from the proposed development into the stormwater attenuation ponds prior to its release into the surrounding environment.

Three (3) Channelled Valley Bottom ("CVB") wetlands in a seriously modified state were identified east of the site. Two smaller and heavily modified CVB wetlands (CVB wetlands 2 and 3) serving as breeding habitat were identified and do not encroach onto the site. Only a small portion of the larger CVB wetland 1 associated with the unnamed tributary of the Klapmuts River is located on the site, of which approximately 6.74ha of wetland will be lost, as explained above. Another CVB wetland (CVB wetland 4) was identified north of the site. With the exception of the fences, maintenance road and stormwater released into CVB wetland 3, no significant or long-term modifications are anticipated to the CVB wetlands. The development proposal will remain outside of the recommended 15m conservation buffer of the CVB wetland areas. Various artificial features identified in the central portion of the site, includes a quarry associated with historical open-pit clay mining activities, artificial impoundments connected to the CVB wetland 1, stormwater channels and agricultural drains.

The development proposal was found to pose a 'Low' risk significance to CVB wetlands 2 and 3, which is considered to be acceptable. The construction and operation of the expanded CWA will, however, pose a 'Moderate' risk significance to seep wetland 1 due to the anticipated 6.74ha wetland habitat loss. In addition to the required wetland offset, key control measures that include, *inter alia*, avoiding directly impacting the seep wetlands and the maintenance of a 15m wide construction conservation buffer measured from the wetland edge, must be implemented.

Construction- and operation activities that may impact the abovementioned aquatic systems include, (a) modification of the seep wetland 1, hydrological functioning of CVB wetlands 2 and 3, and water quality, (b) alteration of the geomorphological processes (sediment balance, erosion and sedimentation), and (c) wetland habitat loss, altered wetland habitat and impacts to biota. The impact of construction- and operation activities on aquatic systems will be of 'Moderate', 'Low' and 'Very Low' negative significance with the implementation of mitigation measures contained in the EMPr and aquatic specialist recommendations made conditional to this Environmental Authorisation. The loss of or alteration to wetland habitat and the impacts to biota were assessed to be of 'Moderate' significance with the implementation of mitigation measures contained in the EMPr and aquatic specialist recommendations made conditional to this Environmental

Authorisation. For this reason, it will be imperative that the abovementioned wetland offset be implemented in accordance with the specifications of the National DWS.

According to the Freshwater Ecological Assessment Report (dated September 2024 and compiled by FEN Consulting), the Preferred Alternative is considered acceptable from a freshwater ecosystem management perspective, with the implementation of control/mitigation measures (also included in the EMPr).

An application to obtain a Water Use Licence in terms of the National Water Act, 1998 (Act No. 36 of 1998) was submitted to the National DWS.

Further to the above, the Maintenance Management Plan submitted together with the final EIA Report contains provisions that will ensure infrastructure is maintained in a manner that protects the integrity of the local aquatic system.

3.4 Hydropedology Impacts

Earthmoving activities (excavation) could potentially intercept subsurface flows and affect watercourse recharge. To assess the hydropedology impact of earthmoving activities for the expanded CWA, conceptual models were developed to analyse the flow paths of water and how earthmoving activities might disrupt flow paths in the landscape and affect recharge mechanisms.

Potential impacts during the construction phase include, *inter alia*, the altered natural flow of water, reduced infiltration, disruption of wetland recharge mechanisms and altered recharge of natural streams. Using various methodologies, including hydrological modeling, it was determined that at the basin scale, landscape unit and hydrological response unit scale, no major changes in hydropedological processes are predicted.

During the operational phase, the hydropedological processes are anticipated to remain largely unmodified, and the functionality of the wetlands identified within the catchment area will likely remain unchanged if stormwater is managed effectively in terms of the approved Stormwater Management Plan.

Whilst the overall hydropedological impacts were deemed to be minimal, measures which form part of the EMPr will be implemented to provide additional mitigation, which includes *inter alia*, the implementation of erosion control measures (specifically to limit loss of soil and sedimentation), restricting the development footprint areas to the demarcated areas, and discharging water from clean water diversion structures into the adjacent wetland features in an attenuated manner.

3.5 Aquatic: Groundwater

The local aquifer is classified, as 'fractured' with potential borehole yields. The groundwater quality ranges from 'ideal' to 'poor'. Users are currently extracting groundwater from the fractured aquifer. A large geological structure, *i.e.*, the Colenso Fault, is mapped on the northeastern boundary of the site. This area is required to be treated as a 'no-go' area for high risk activities during the lifecycle of the expanded CWA.

The site has a 'Low' to 'Low/Medium' vulnerability classification. Susceptibility of the aquifer to contamination from anthropogenic activities was considered to be 'Low' to 'Medium', which is attributed to the clay content of the Malmesbury Group. The clay found underlying the site, therefore provides some degree of protection to the underlying fractured rock aquifer. The aquifer vulnerability nonetheless increases to the north-east and will therefore be considered as a 'no-go' area. This requirement forms part of the provisions of the EMPr.

Several sources of contamination from the construction and operation of airports exist, *namely*; surface runoff, leaks from fuel storage and distribution, atmospheric deposition, direct release, and accidental contamination. Additionally, the proposed on-site waste

water treatment plant is considered to be a potential source of pollution. However, the concerns received about digestate from biodigesters potentially leading to nutrient pollution warranted the redesign of the wastewater treatment plant such that the feed stream will comprise of treated effluent from the on-site WWTW and cultivated biomass/energy crop. With the implementation of all required mitigation or measures for avoidance, the impact can be reduced to 'Low' and 'Very Low' negative significance. The required mitigation or measures for avoidance requires the implementation of necessary levels of protection and monitoring as well as the adherence to applicable standards regarding installations for the storage of dangerous goods.

Since groundwater will be abstracted, impacts relate to over-abstraction from boreholes leading to a reduction in regional groundwater levels. Groundwater abstraction volumes must be monitored, which includes having to cease abstraction when low groundwater levels persists and until such time that groundwater levels have recovered. This will extend to monitoring of groundwater for poor quality due to exposure and oxidation of minerals and having to cease abstraction until water quality of the boreholes recover.

The cumulative groundwater impacts will range from 'Medium' to 'Very Low' significance, with the implementation of mitigation measures contained in the EMPr.

3.6 Botanical Impacts

The site comprises of a few vegetation types specified according to the categories that have been mapped in the City of Cape Town's Biodiversity Network (2024), and includes land demarcated, as Critically Biodiversity Area ("CBA") 1a: selected irreplaceable high or medium condition site and CBA1c: selected irreplaceable low condition site.

The most northern portion of the site comprises of a remaining patch of Swartland Silcrete Renosterveld vegetation. According to the Plant Species Impact Assessment Report (dated 10 February 2025 and compiled by Nick Helme Botanical Surveys), the site has a 'High' to 'Very High' density of woody alien invasive vegetation present. The least disturbed portions of the site are of 'Medium', 'High' and 'Very High' sensitivity with increasingly high levels of indigenous plant diversity. Plant SCC were recorded in areas of 'Medium', 'High' and 'Very High' botanical sensitivity.

The primary construction phase botanical impact is the loss and degradation of the remaining natural and partly natural vegetation, including plant SCC. Since the development proposal will result in the loss of approximately 1.6ha of 'Very High' sensitivity vegetation and approximately 2.7ha of 'Medium' sensitivity vegetation, there will be a 'Medium' to 'High' residual impact for which a biodiversity offset will be implemented. The biodiversity offset compensates for the loss of the aforesaid vegetation. The biodiversity offset will measure a minimum of 89ha in extent and will take place on the Farm Hercules Pilaar No. 1242, Paarl. The biodiversity offset site contains Swartland Renosterveld and remnants with significant concentrations of Critically Endangered and Endangered SCC. Whilst the Biodiversity Offset Report (dated 20 June 2025 and compiled by Mr. M. Botha) calculated that a minimum 77ha terrestrial offset is required, a biodiversity offset area of a minimum 89ha has been proposed. This represents an overcompensation of the extent of land required to offset the on-site terrestrial biodiversity impact that the development proposal will have. As an additional safeguarding measure, the approved EMPr further includes an overarching provision which requires that 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 of Cape Town ownership), should the agreed to biodiversity offset not be implemented, as intended.

Compliance with Conditions 34 to 36 of this Environmental Authorisation will ensure that the biodiversity offset is implemented, as intended.

The main operational phase impacts include a reduction of the 'Low' to 'Moderate' levels of ecological connectivity and associated habitat fragmentation. Brush cutting the airside Open Space Areas to comply with safety Regulations may have further negative impacts on vegetation. Overall, the operational phase botanical impacts will be 'Neutral' to 'Low' negative significance with the implementation of mitigation measures and the biodiversity offset. The overall cumulative ecological impacts at the local scale are likely to be 'Neutral' or even 'Low' positive significance with implementation of mitigation measures, the biodiversity offset, and on-site management of the remaining conservation worthy areas. Mitigation measures include, *inter alia*, the conservation of the 'Very High', 'High' and 'Medium' sensitivity areas that do not fall within the development footprint (treating it as 'no-go' areas), the remaining 'Very High', 'High' and 'Medium' sensitivity botanical areas being protected by means of an ecological buffer area of at least 5m wide or being fenced off entirely, the translocation of SCCs, and a plant search and rescue operation prior to the commencement of earthmoving- or construction activities. The required measures to mitigate the botanical impacts forms part of the provisions of the EMPr and Conditions of this Environmental Authorisation (please refer to Conditions 41 to 41.14).

3.7 Fauna: General

The site has an intermediate to moderately low diversity of mammals, invertebrates, herpetofauna and avifauna. The 'Moderately Low' sensitivity portions of the site make up the largest part of the site used for foraging by most faunal species. Faunal impacts during the construction phase include, *inter alia*, loss of habitat, displacement of species, potential increased mortalities, potential poaching/snaring, and loss of habitat connectivity and movement corridors. During the operational phase, faunal impacts include, *inter alia*, increased mortalities, noise and light pollution negatively affecting fauna.

It should, however, be noted that the site is located within a region that has already been subjected to extensive land transformation and habitat degradation, stemming from agricultural activities, urban/peri-urban development as well as extensive alien plant proliferation. This has resulted in a notable cumulative loss of faunal habitat within the region.

Adhering to the various measures included in the EMPr will contribute to mitigating the identified faunal impacts. In this regard, it is required that construction activities be undertaken in a controlled and confined manner. During the operational phase, it is required that sound environmental management practices be adhered to whilst ensuring that no deliberate acts are permitted that would result in further negative impacts, e.g., the prohibition of hunting, trapping, or setting of snares by personnel.

The site has different broad habitat units viz. Renosterveld Habitat, Freshwater Habitat, Modified Habitat and Artificial Impoundments and Agricultural Drains. With the exception of small isolated remnant patches of natural habitat remaining with limited species diversity and faunal abundance, the abovementioned habitats are largely in a modified state. This has resulted in a significant degree of habitat loss for faunal species, and a marked decrease in faunal species diversity and abundance. In light of this and the site's extensive footprint, the Faunal Assessment Report (dated February 2025 and compiled by Scientific Terrestrial Services (Pty) Ltd), confirmed that the development proposal is not expected to result in a significant loss of natural habitat, resources or faunal species diversity. The development proposal was therefore recommended for approval from faunal perspective, provided that faunal mitigation measures included in the EMPr are implemented.

3.8 Fauna: Avifauna

The site does not fall within any Important Bird and Biodiversity Areas ("IBA"). The closest IBA is the Rietvlei Wetland: Table Bay Nature Reserve IBA, located 20km to the west of the study area.

The field observations reported on in terms of the Avifaunal Assessment Report (dated February 2025 and compiled by Scientific Terrestrial Services (Pty) Ltd), revealed that *Grus paradiseus* (Blue crane) particularly favours the on-site cultivated fields, which may be negatively impacted upon due to the newly expanded CWA. Other avifauna observed during field observations include *Phoenicopterus roseus* (Greater Flamingo, NT), *Phoenicopterus minor* (Lesser Flamingo, NT), *Circus ranivorus* (African Marsh Harrier, EN), *Circus maurus* (Black harrier, EN), *Falco biarmicus* (Lanner Falcon, VU), *Sagittarius serpentarius* (Secretarybird, VU), *Aquila verreauxii* (Verreaux's Eagle, VU), *Pelecanus onocrotalus* (Great White Pelican, VU), and *Oxyura maccoa* (Maccoa Duck, NT).

The avifaunal diversity associated with the site is considered 'Moderately Low', mainly consisting of common avifaunal species, with few rare and reclusive birds observed. In terms of food availability, the site is considered to have a 'Moderately Low' abundance of forage for avian species as a result of the historic and existing agricultural activities and severe Alien Invasive Plant proliferation. Transformation by historic and existing agricultural activities has resulted in 'Moderate' habitat integrity. Habitat availability is considered to be patchy and ranges from 'Intermediate' to 'Moderately Low'.

The development proposal will ultimately lead to a reduction in habitat, which may increase resource competition in adjacent habitats due to species displacement. The scale of edge effects that may be experienced may cause further degradation to the surrounding habitat if not appropriately managed. Other impacts include an increase in both air- and road traffic that may increase the possibility of collisions, surface water features that will attract birds and may increase the potential for collisions and loss of/changed avifaunal species habitat, diversity, movement patterns and breeding opportunities. According to the findings of the Avifaunal Assessment Report (dated February 2025 and compiled by Scientific Terrestrial Services (Pty) Ltd), the perceived impact significance to the avifaunal assemblages of the site can be suitably managed provided that mitigation measures are implemented. With mitigation, impacts can be reduced to 'Medium' to 'Very Low' significance levels. The development proposal was therefore recommended for approval, provided that all management and mitigation measures are implemented. Mitigation measures include the requirement for construction activities to take place in a controlled and confined manner. During the operational phase, sound environmental management practices and other measures must be adhered to in order to limit and/or mitigate impacts on avifauna and associated habitat. These mitigation measures have been included in the EMP.

3.9 Poultry Biosecurity and Impacts

Due to the effect of the expanded CWA on the adjacent poultry farms, aspects that could affect the biosecurity of poultry farms and the health of poultry were assessed in the Biosecurity, Poultry Health Study (dated March 2024, with revisions dated January 2025 and compiled by Dr. Deryn Petty).

During the construction phase, dust and elevated noise levels could affect nearby poultry farms. During the operational phase, poor air quality can affect broiler performance and suppress immune function.

According to the Air Quality Impact Assessment Report (dated June 2025 and compiled by DDA Environmental Engineers), it was determined that long-term air quality is unlikely to significantly impact poultry farms. Whilst the on-site WWTW will generate ammonia emissions, the facility will be located too far away from the local poultry farm (County Fair) to be of 'Negative' significance. In terms of noise, the average noise levels show small impacts on the County Fair farm. Based on the contours, there is a minimal average effect of noise on the County Fair farm of 55db. The effect of noise from trucks and cars arriving at- and leaving the expanded CWA can be a significant source of noise, hence careful planning of road layouts and/or traffic calming measures must be considered to mitigate noise impacts (refer to Conditions 45 to 46).

Regarding the impact of vibrations on birds and chickens, it was emphasised that noise from aircraft vibration is intermittent. The walls of poultry houses and the boundary walls around the poultry farm will act as 'dampers' and prevent the resonance frequency from being achieved at the poultry facility.

Although light pollution can disrupt the circadian rhythm, another important consideration is the startling of the birds from headlights shining into poultry sheds at night. In this instance, poultry would respond to being startled by bunching together in a corner away from the stimulus and killing each other by suffocation. Therefore, in terms of the Visual Impact Assessment Report (dated 26 February 2025 and compiled by Filia Visual (Pty) Ltd), the proposed lighting measures will include specific focus on mitigating the impacts of light pollution on the poultry farm in the vicinity of the site. It is required that the Site Development Plan responds to the impact of light pollution by specifying the guidelines to be followed, which must include lighting design concepts that reduces impacts on the surrounds and a lighting audit to be conducted to ensure that all lighting related mitigation measures are adhered to and successfully implemented (refer to Conditions 40 to 40.2.).

Since the newly expanded CWA will accommodate food supplies and trading, the likelihood of the presence of rodents and pests may pose a risk to the neighbouring poultry farms. Hence, the waste handling of the development proposal must incorporate measures to reduce such risks and mitigate any resultants impacts. The Waste Management Plan (dated July 2025 and compiled by PHS Consulting), which incorporates such measures will be implemented (refer to Condition 24). Parallel to this, it should be noted that the use of a biodigester to convert poultry manure and feed waste into methane needs has been amended to the use of grass feedstock and treated sewage water instead. These changes are based on previous concerns raised by I&APs regarding the use of chicken manure on-site and the associated impacts of such practices.

Careful consideration must be given to reduce the likelihood of any new dams attracting wild birds that will increase the risk of spreading contagious diseases to the nearby poultry farm(s).

The Biosecurity, Poultry Health Study concluded that with suitable mitigation measures it should be possible for the said poultry breeder farm and the proposed airport to coexist.

3.10 Agricultural Aspects

The site is located in an area of agricultural significance in terms of the Municipal SDF. The majority of the properties, *i.e.*, Portion 7 of the Farm No. 942, the Remaining extent of the Farm No. 474 and Portion 3 of the Farm No. 474, Fisantekraal, will retain its Agricultural zoning and encompass the Agricultural Precinct. The Agricultural Precinct is therefore the largest Precinct of the expanded CWA with a coverage of approximately 462ha (approximately 53% of the site).

The portion of the runway located within an area of "Agricultural Significance" is considered to have a low impact on existing agricultural activities, since this portion is located within an existing mining servitude of approximately 24.9 hectares.

The site comprises of soils with a strong structure and high clay content, making the soil mostly imperfectly to poorly drained. The strong structure in the subsoil places a restriction on root development. Most of these soils have a sandier topsoil on a clay subsoil that are usually sensitive to erosion if poor management practices are applied.

The site has very limited access to water that can be used for irrigation with most irrigation water being extracted from boreholes. This, coupled with varied rainfall seasons, reduces the site's agricultural potential (especially irrigated agriculture), except for the potential of winter small grain production and livestock farming.

The potential for irrigated agriculture is regarded as 'Very Low'. The potential for winter small grain production is regarded as 'High', depending on the properties of the soil.

Livestock farming potential is reduced by limited grazing during the late summer months, but the potential is regarded as 'Medium-High'. External factors such as security issues and livestock theft, especially for a site located moderately close to the Cape Metropole, can be regarded as a constraint limiting small livestock farming.

The Agro-ecosystem Impact Assessment Report (dated February 2025 and compiled by Agri Informatics) determined that the impact of the loss of 168ha high potential productive land is regarded to be of 'High' significance. Of this 168ha area, only 100ha (60%) is being cultivated (wheat production). This means that there is a negligible reduction of 0.02% of the total national wheat production and 0.03% of the Western Cape's wheat production. It is argued in the said Assessment Report that the impact on food security will be mitigated with the expanded CWA supporting food security through its contribution to access to food, its role in food distribution logistics as well as job creation that will lead to wider food affordability.

The said Assessment Report justified the impact of losing high potential productive land in terms of the perceived importance of the expanded CWA as a key infrastructure node for the Cape Metropole and surrounding districts. The development proposal was therefore supported and recommended for approval.

3.11 Geotechnical Impacts

A regional fault system (the Colenso Fault) is mapped along the northeastern boundary of the site. The said fault system lies within the Agricultural Precinct, and is not deemed to pose a significant constraint to the expanded CWA.

According to the Geotechnical Reconnaissance Investigation Report (dated 31 May 2022 and compiled by GEOSS South Africa (Pty) Ltd), the development proposal can take place from a geotechnical perspective. However, precautionary- and other additional measures are required to be implemented to overcome engineering-geological problems, including, *inter alia*, the conduct of exploratory drilling and follow-up geotechnical investigations, prior to the construction of individual structures.

3.12 Mining Aspects

The existing quarry on Portion 23 of the Farm No. 724, Fisantekraal has an existing Mining Licence. The quarry will be converted into a stormwater retention facility to support the stormwater management of the expanded CWA. Proof of having lodged the required application with the Competent Authority to obtain a mining closure certificate for the quarry was provided.

3.13 Heritage Impacts

According to the Heritage Impact Assessment ("HIA") Report (dated October 2024 and compiled by Aikman Associates Heritage Management), there are no built environment heritage resources of significance. Although two of the structures in the study area are older than sixty (60) years neither of them is of aesthetic significance nor deemed to be conservation worthy. The site is not archaeologically sensitive. It was concluded that the impact on heritage resources will be of 'Low' significance. Additionally, the expanded CWA will have immense sustainable social and economic benefits. The expended CWA was recommended for approval, subject to the implementation of the mitigation measures set out in the Visual Impact Assessment Report (dated 26 February 2025 and compiled by Filia Visual (Pty) Ltd). It was further confirmed in the Archaeological Scoping Report (dated October 2023 and compiled by ACRM), that the expanded CWA will not impact on important 'Stone Age' archaeological heritage resources.

The correspondence from Heritage Western Cape (dated 7 February 2025), indicated that the HIA Report (dated October 2024 and updated on 7 February 2025) meets the provisions of Section 38(3) of the National Heritage Resources Act, 1999 ("NHRA") (Act No. 25 of 1999), and the expanded CWA is therefore endorsed.

The implementation of Conditions 19 and 20 of this Environmental Authorisation will help to ensure the protection of any heritage resources that may be encountered on the site.

3.14 Visual Impacts

The receiving environment (5-10km radius around the site) predominantly comprises of agri-industrial and suburban (and industrial) land uses within the Urban Edge. A number of bulk infrastructure features, including Eskom servitudes containing overhead powerlines, distribution lines, sub-stations and telecommunication infrastructure exist. These features contribute to visual clutter and discordant elements visible in the landscape surrounding the site. Other features include masts of the Goedverwacht Radio Station, the Fisantekraal WWTW, various poultry batteries, the Durbanville Industrial Park, some mining-related land uses and industries. The land uses further away include agriculture, agri-industrial, peri-urban/industrial (concentrated along the Klipheuwel corridor) and urban/residential. The receiving environment therefore has a mixed landscape character and 'Sense of Place'.

According to the Visual Impact Assessment Report (dated 26 February 2025 and compiled by Filia Visual (Pty) Ltd), the 'Zone of Potential Visual Influence' for the development proposal is between 3km and 5km (may increase to 10km at night). The overall development proposal will result in 'Moderate' visual intrusion (with aspects of 'Low' visual intrusion and 'High' visual intrusion). This is due to, *inter alia*, the expanded CWA contrasting moderately with patterns and elements that define the structure of the landscape, and development proposal being partially compatible with land use, settlement and enclosure patterns. The 'High' visual intrusion is attributed to the development proposal being unable to be 'absorbed' into the landscape.

In terms of visibility, the overall development proposal will result in 'Moderate' to 'High' visibility. This is due to the development proposal being visible from more than half of the 'Zone of Potential Visual Influence', views that will partially be obstructed and many viewers that will be affected. In this regard, the sensitivity of visual receptors will vary, depending on their distance from the site.

In terms of compatibility, the overall development proposal demonstrates 'Medium' compatibility relative to the receiving environment, since it will introduce entirely new or unprecedented elements into the landscape. In the same way, the overall development proposal will cumulatively result in an increase in developed land and conditions of urbanity within the Northern District of the City of Cape Town. The possibility, however, exists for positive cumulative visual impacts, if the undeveloped areas of the site are not degraded, and are managed actively to maintain scenic quality. Cumulative visual impacts extend to the visual impacts of lights at night, especially for viewers located within the surrounding landscapes. Little scope for mitigation exists, due to lighting requirements having to meet aviation safety specifications. This implies that negative visual impacts during the operational phase will remain of 'Medium' significance after mitigation, whereas during the construction phase visual impacts will be of 'Low' to 'Very Low' significance after mitigation. An Overall Lighting Report and a lighting proposal must be prepared prior to the commencement of construction activities in order to address aspects of light pollution and the impacts on surrounding areas (refer to Condition 40.1).

The signage and advertising for expanded CWA mounted on the site is required to comply with the relevant municipal requirements and By-Laws.

Mitigation measures must adhere to Urban Design Guidelines, including aspects of fencing, walls, entrances and boundary interfaces, lighting as well as materials and finishes, and Landscape Guidelines. Other mitigation measures that will help to enhance the aesthetics and functioning of the site include, *inter alia*, employing modern aesthetics, developing engaging public areas, implementing innovative roofscapes, having functional colonnades that offers shelter from various elements, having abundant landscaping, incorporate finishes and materials that pay homage to the local context, employing inventive design solutions to elevate the visual and utilitarian facets of buildings,

ensuring that signage is harmonious, adopting other people-centric design elements and adhering to visual buffers zones to limit visual impacts from certain viewpoints in the receiving environment. During the construction phase, good management practices must be implemented to help achieve a 'Low' negative significance rating for visual impacts.

Based on the outcomes of the said Visual Impact Assessment, it was concluded that the expanded CWA can be supported in the context of the EIA application.

3.15 General/Aviation Aspects

The existing airport will be upgraded to a Category 9 Aerodrome licensed with the SACAA. All requirements must be met in order to permit the development proposal on the site. In this regard, it was illustrated during the EIA process that the development proposal complies- or will comply with the following requirements and provisions:

- Compliance with the Civil Aviation Act, 2009 (Act No. 13 of 2009);
- The White Paper on National Civil Aviation Policy, 2017 ("NCAP");
- The National Airports Development Plan, 2015 ("NADP");
- The White Paper on National Transport Policy, 2021 ("NTP");
- The National Transport Master Plan, 2050 ("NATMAP 2050");
- The requirements in terms of the Chicago Convention, 1944; and
- The International Civil Aviation Organization ("ICAO") Regulations.

A total of 24 aerodromes are located within a twenty (20) nautical miles radius of the site. Other civil aviation installations near the site include navigational aids and surveillance equipment. In addition, various Wide Area Multilateration ("WAM") antenna sites are planned in the wider area.

Airspace:

The current airport does not have any designated airspace and falls within the Cape Town Special Rules Area. Therefore, a request will be made to join controlled airspace to acquire an instrument joining clearance from Cape Town Air Traffic Control.

The increase in flight activity for the expanded CWA will affect the flight operations at nearby aerodromes, *namely*; civil aviation aerodromes, AFB Ysterplaat and CTIA. Therefore, to determine safe and efficient ways of operating flights in and out of the site in relation to the existing aerodromes, various studies were commissioned, which is discussed below.

The Airspace and Capacity Study (dated 22 March 2024 and compiled by Straten Consulting Services Limited) addresses certain aspects of airspace in the context of the existing environment as well as existing airports. The study determined that the CWA (FAWN) will be able to operate independently from CTIA (FACT). Any future development plans for FACT are not expected to be an issue. The runway re-alignment will enhance airspace use and further cement the independent operations between the two airports. However, the Airport Task Force that was commissioned by Capewineland Aero (Pty) Ltd. dealt with specific concerns that will help determine the detailed airspace design requirements. In a similar manner, the requirements in terms of general aviation must be confirmed in consultation with all relevant stakeholders and authorities in the aviation sector. These requirements fall beyond the scope of this Scoping and EIA application process.

The Visualization of FACT and FAWN Combined Operations Report (dated October 2023 and compiled by Royal NLR - Netherlands Aerospace Centre) provides visualization material to display the combined operations between CTIA and the expanded CWA in order to identify conflicts that may arise in terms of the traffic flows between the two airports. The results indicated that in terms of air traffic patterns, no delays or bottlenecks will be experienced, and the virtually 'parallel' routes will contribute to avoiding capacity restrictions at the said airports. No capacity constraints nor conflicts were identified, with the latter being attributed to the parallel approaches/routes to and from the airports.

Additionally, the Civil Aviation Compliance Statement (dated 26 May 2025 and compiled by Royal HaskoningDHV (Pty) Ltd) found that the expanded CWA will impact airspace operations in the area, as well as neighbouring developments. However, the airport must adhere to all prescribed methods and comply with applicable legislation, regulations, standards, and recommended practices. In this manner, the associated impacts must be appropriately mitigated and managed, resulting in a compliant airport with operations that will integrate into the regional and national civil aviation environment.

Obstacle Evaluation:

Annex 14 Obstacle Assessment Report (dated 4 October 2022 and compiled by ATNS) details the assessment of the surveyed obstacles to investigate their influence on existing or future instrument procedures and whether these obstacles will have any effect on the Annex-14 surfaces. An evaluation of the natural- and man-made constructions inside and outside of the site's boundary was conducted to determine the limitations on the distance available for take-off and landing and on the range of meteorological conditions in which take-off and landing can be undertaken. This evaluation was required in order to establish the necessary measures to ensure the safety of aircraft during take-off or landing, or while flying in the vicinity of an airport. These measures will ensure the safety of the passengers and crews aboard them. It was determined that the surveyed obstacles were found not to have any impact on aircraft operations. It is, however, required that all structures and buildings in and around the airport be treated as an obstacle and should be clearly marked and identified (this includes meeting the requirements of day and night markings). The detailed specifications required by the relevant authorities, including the SACAA, with respect to obstacles and its influence on the operations of the expanded CWA must be adhered to.

Concept of Operations:

The integration of the airspace around the expanded CWA with the existing controlled airspace around CTIA to ensure safe, efficient, and harmonious air traffic management whilst accommodating the growing demand for air travel and aviation activities in the region and at the same time adhering to the South African National Airspace Masterplan was considered, as part of the 'Concept of Operations'. In this regard, the surrounding civil aviation sites and small aerodromes, model aircraft sites, the key aerodromes as well as 69 obstacles were identified. This information will be incorporated into the detailed airspace design of the expanded CWA to determine the measures required to ensure safe, efficient, and harmonious air traffic management. These considerations will be applicable when the airspace of the expanded CWA becomes available. According to the Development of an Airspace CONOPS for the Cape Winelands Airport Report (dated 8 October 2024 and compiled by NACO – a company of Royal Haskoning DHV (Pty) Ltd), other technical instruments related to flight procedures will be determined and finalised during the lifecycle of the expanded CWA. Applying for airspace approval is a separate formal process for which the National Airspace Committee ("NASCOM") is the Competent Authority.

Bird Strike

The Bird Strike Risk Assessment Report (dated September 2024 and compiled by Avri Avian Environmental) was specifically commissioned to determine the risk birds pose to aviation safety and is a requirement for obtaining a license from the SACAA. The said Assessment (dated September 2024 and compiled by Avri Avian Environmental) used the ICAO methodology, which includes the consideration of a 13km radius around the site as well as the consideration of the primary- and secondary bird hazard zones where collisions may occur. Further considerations included local bird diversity and land uses that may attract birds. Using the assessment criteria, a subset of bird species was identified that were either frequently recorded and/or having a high hazard/risk level within both the primary- and secondary bird hazard zones. The results showed that the agricultural land use and water bodies within the primary bird hazard zone surrounding the site contributes to the presence

and abundance of high-risk bird species. Hence, various management and mitigation measures must be implemented to address the risk that birds and birds strikes. These measures will form part of the Bird and Wildlife Hazard Management Landscape and Open Space Planning Guideline that must be implemented (refer to Condition 38).

3.16 Defence Aspects

The site is deemed to be of 'Medium' sensitivity due to its proximity to a Military and Defence Site, *i.e.*, the Goedverwacht communications base, located to the southwest of the site. According to the Annex 14 Obstacle Assessment Report (dated 4 October 2022 and compiled by ATNS), the proposed airspace procedures will not interfere with military airspace. Furthermore, it has been determined that there will not be a need for new communication system frequencies, and frequency interference with existing defence installations and radar systems is unlikely. Proof that the South African National Defence Force, the South African Air Force and National Airspace Committee have been consulted during the application process has been provided with the public participation particulars. It was confirmed, as part of the Aviation Specialist Studies in support of the Environmental Impact Assessment at Cape Winelands Airport (dated 23 August 2024 and compiled by Royal HaskoningDHV (Pty) Ltd), that no military/defence-related activities take place at the existing airport.

3.17 Sustainability and Climate change

The Climate Change Impact Assessment Report (dated February 2025 and compiled by Brundtland Consulting (Pty) Ltd), assessed the potential contribution of the expanded CWA to climate change through the production of Greenhouse Gas ("GHG") emissions from its direct and indirect activities, and also considers the impact that climate change could have on the operation, value chain and environment of the expanded CWA. Emissions have been determined up to 2050 to coincide with South Africa's net-zero emissions scenario. The abovementioned Assessment determined the vulnerability of the expanded CWA to the risks of climate change and the associated impacts.

To determine the vulnerability of the expanded CWA to the risks of climate change, a physical risk assessment, inclusive of historical climate data and future climate projections, was undertaken. In terms of physical risks related to the physical impacts of climate change, the identified climate risk that may impact the expanded CWA includes, *inter alia*, wildfires, landslides, water scarcity, extreme heat and flooding. Water scarcity and extreme heat heightened the identified risks. This is attributed to the effect of variable temperatures and weather patterns caused by climate change. Both reactive- and proactive mitigation and adaptation measures that must be implemented have been included in the EMP. These measures will reduce the vulnerability of the expanded CWA to each of the identified climate-related risks. Such measures focus on enhancing the expanded CWA to achieve the goals of water resilience (see Condition 32), water sensitivity, flood-readiness and storm management, managing fire risk and responsiveness, having zero emissions buildings and adopting sustainable waste and energy solutions.

In terms of climate change risk, the carbon footprint of the expanded CWA was defined by considering the GHG emissions of the development proposal. High emissions levels were estimated for the construction phase, which has been attributed to the use of cement, steel, asphalt, and plastics for the development of roads, runways, and stormwater infrastructure, fuel and energy used for the operation of machinery, embedded common construction materials, emissions related to electrical infrastructure and emissions caused by vehicular trips to and from the site.

During the operational phase of the expanded CWA, which is projected to be fully operational in 2050, the total emissions across different scopes (*i.e.*, emissions released directly, indirectly and through value chain emissions) up to the year 2050 are approximately 5.3 million tons of carbon dioxide equivalent, assuming that the proposed renewable energy technologies have been implemented and mitigation was applied to any hard-to-abate emissions.

It was determined that the direct operation of the expanded CWA would have a 'Low-Medium' impact due to the planned sustainability measures to be implemented. The total projected emissions would have a 'Medium' impact on the National Carbon budget due to the significant contribution on account of value chain emissions, including domestic aviation, to the development proposals overall carbon footprint. It is expected that the emissions from domestic aviation will be considered in terms of the Carbon Tax and the mandatory carbon budgets allocation under the Climate Change Act, 2024 (Act No. 22 of 2024). Scope exists to reduce future growth-induced emissions with the establishment of improved Infrastructure. Indirectly, with the expanded CWA being used as an 'alternate' airport, the emissions resulting from diversion could be reduced by 3-5%.

Specific components of the expanded CWA will be responsive to aspects of sustainability and climate change. Building design will, for example, incorporate measures to enable urban cooling and heat responsiveness. The installation of the Solar PV and the biodigester will help to reduce the energy demand from Eskom whilst ensuring that the expanded CWA becomes more self-sufficient through decreased reliance on non-renewable and fossil fuels, as sources of energy. Emission reduction will be achieved by limiting the use of combustion engines and promoting the use of electric vehicles on the site. In terms of adhering to a circular waste economy, a Waste Management Plan will be implemented, which involves waste minimisation at source with for zero waste to landfill, as far as it is possible.

Overall, the expanded CWA will impact climate change from a construction- and operational perspective. The extent of climate change impacts is classified as global, and the duration is defined to be long, since climate change impacts could potentially be reversed. The total impact (including cumulative) is deemed to be of 'Medium' significance.

Whilst the expanded CWA will produce GHG emissions, it offers a socio-economic boost to the region and local economy, including tourism. As a reliever airport, the expanded CWA could improve operational efficiencies for airlines, as explained above. The expanded CWA therefore aligns with national- and global climate goals, whilst ensuring resilience against evolving climate challenges by implementing the planned mitigation and adaptation strategies.

3.18 Noise Impacts

According to the Noise Impact Assessment Report (dated June 2025 and compiled by DDA Environmental Engineers), noise modelling based on current and future projected air traffic simulation figures was used to determine noise impacts, which included the use of stationed monitoring points. Ambient noise measurements were performed in order to establish the existing ambient noise levels in the surrounding areas.

During the construction phase, general construction activities are likely to temporarily increase the local noise level. The typical construction activities causing noise include, *inter alia*, the establishment of the construction camp and site preparation works, initiation of the main civil and electrical works, major civil and electrical works, commissioning of runway 01-19, and the use of construction equipment and vehicles on the site. Certain parameters, including average height of noise sources: 2m, construction operating hours: 24 hr (used as a worst-case scenario), no noise barriers in place and various construction site equipment being on-site, were considered. Based on these determinations, it was found that the noise levels at the closest community receptors are not expected to exceed the SANS Guidelines for Urban Residential Areas during the construction phase. Standard measures form part of the EMPr to mitigate noise during the construction phase, including noise monitoring (refer to Condition 45). Noise impacts during the construction phase is deemed to have a 'Low' significance rating with the implementation of mitigation measures.

During the operational phase, noise from airport operations were simulated with the use of the US FAA's AEDT model with various other factors and parameters considered, including *inter alia*, the operations driven by market time over time, the type of aircraft to be used, the flight times at the airport, and flight paths. The operational noise scenarios modelled, included the following scenarios:

- Scenario 1: Existing operations at full capacity ('No-Go' Alternative);
- Scenario 2: New runway in operational year; and
- Scenario 3: New runway at full capacity.

In terms of Scenario 1, the 60 A-weighted decibels ("dB(A)") zone for the day-night noise rating level is completely contained within the site. The total area affected by noise levels higher than 55dB(A) is 2.47km². A small portion of this noise contour extends beyond the R312 Regional Road towards the south, within the Greenville Garden City residential development. The noise contour above 70dB(A) is 8.6km², and a large portion of this area extends beyond the boundary of the site primarily into the Greenville Garden City residential development and into the Bella Riva residential development.

In terms of Scenario 2, the 55dB(A) noise contour will largely be contained within the site, with the only extension of the noise contour measuring 1.44km² from the site (*i.e.*, no extension of the 55dB(A) noise contour into the residential areas proposed west and south of the site). The 60-65dB(A) noise contour will extend 0.51km², the 65-70dB(A) noise contour will extend 0.15km² and the 70-75dB(A) noise contour will extend 0.03km² with no further noise contours/impacts.

In terms of Scenario 3, the impact zones will extend beyond the boundary of the site. The length of the 55dB(A) impact zone will reach 4km north from the northern site boundary, in a north-north-westerly direction and reach (not overlap) the Klipheuvel residential area. Towards the west, the 55dB(A) contour will reach the Bella Riva residential development.

South of the site, the 55dB(A) noise contour will extend less, reaching a distance of 3.3km, which will overlap with the Greenville Garden City residential development. Immediately south of the runway, the noise levels will be between 60dB(A) and 63dB(A).

In terms of discrete receptors (*i.e.*, sensitive receptors, such as schools and other individual farmhouses around the site), the noise levels calculated indicate that schools identified (*i.e.*, R04, R25 and R27) will be outside of the 50 dBA zone for all three scenarios. The SANS 10103 District guidelines for urban residential areas are only exceeded for (1) one small area on the eastern side of Bella Riva residential development for Scenario 3, (2) an area immediately south of the site for Scenario 1 and Scenario 3 (R21), and (3) a farm house (R28) situated on the eastern side of Klipheuvel, which a receptor situated further away from the site.

The necessary noise mitigation measures have been included in the EMPr and made conditional to this Environmental Authorisation (refer to Conditions 45 to 46). The provisions of the EMPr require that considerations be given to the implementation of 'passive' mitigation measures, such as noise insulation on existing residential dwellings and noise-sensitive buildings (schools, hospitals, *etc.*). Additionally, noise mitigation measures are particularly required for Scenario 3 and will be finalised when consultations between the relevant stakeholders have taken place (refer to Condition 45.1).

3.19 Air Quality Impacts

Potential health nuisances related to the development proposal include the generation of dust, which will negatively affect air quality during the construction phase. Dust deposition is expected to increase in close proximity to various construction activities (within 300m of the working fence). The extent of this impact is considered to be largely confined to the site. Dust impacts will be of 'Very Low' negative significance without mitigation and 'Insignificant' with the implementation of mitigation measures during the construction phase. The exhaust emissions from trucks and equipment at the site are

expected to marginally increase air pollution concentrations during the construction phase, but this increase in exhaust emissions will largely be confined to the site. The expected impact of exhaust emissions during the construction phase is therefore considered to be 'Insignificant'.

According to the Air Quality Impact Assessment Report (dated June 2025 and compiled by DDA Environmental Engineers), a simulation using the US FAA's AEDT model was used to determine the resulting air pollution levels around the site due to the operation of the expanded CWA, for the following scenarios:

- Scenario 1: Existing runway setup under full utilisation ('No-Go' Alternative);
- Scenario 2: Operations on the new runway 01/19 in the operational year; and
- Scenario 3: Operations on the new runway 01/19 at full capacity.

In terms of Scenario 1, air pollution concentrations were well within respective guidelines with no exceedances observed. However, cognisance was taken of the two residential areas planned to be developed immediately south- and west of the site. Once these communities are established, the sensitivity of the area would be considered moderate, assuming appropriate buffer zones will be established.

In terms of Scenario 2, the air pollutant levels outside the boundary of the site will be very low. The air pollution concentrations during the operation phase of the expanded CWA are expected to be very low at the Fisantekraal community, and the new developments located west and south of the site. Air pollution concentrations during the operational phase of the expanded CWA are therefore within the air quality standards modeled by the US FAA's AEDT. The overall air quality impact for Scenario 2 will be of 'Very Low' significance.

In terms of Scenario 3, the only exceedance in Nitrogen Dioxide ("NO₂") concentrations was in small areas located south and north of the expanded runway. However, the exceedance number per year was only 2 and therefore below the allowable exceedances of 88 per year. In terms of the maximum ground-level Sulfur Dioxide ("SO₂") and PM₁₀ concentrations, both the 1-hour guideline and the maximum annual concentrations were not exceeded. Furthermore, the air pollutant levels at the identified community receptors, including at Fisantekraal and Klipheuwel, were found to be well within the standards modeled by the US FAA's AEDT. The resulting overall impact of Scenario 3, before capacity is reached, is expected to be of 'Low' significance with the implementation of mitigation measures.

The measures required to be implemented to mitigate impacts on air quality during the construction- and operational phases have been included in the EMPr. During the construction phase, mitigation measures focus on dust suppression and measures to control the manner in which construction activities ought to take place. During the operational phase, some of the required mitigation measures include investing in aviation technologies and practices that would ultimately reduce the amount air emissions, and air quality monitoring (refer to Conditions 44 to 44.2.). In addition, continuous air quality monitoring must be conducted.

The expanded CWA will invest in measures that encourage the use of electric vehicles, as opposed to conventional combustion engine-powered vehicles in order to help minimise air pollution caused by vehicular emissions.

To assess the potential cumulative impacts, individual modeling was carried out for County Fair, Clay Industry, the Fisantekraal WWTW and Claytile. The resulting ambient concentrations modelled for these receptors located around the site revealed that the maximum concentrations of all pollutants and time averages are below their respective guidelines in terms of each of the above scenarios.

An Atmospheric Emission Licence ("AEL") in terms of the National Environment Management: Air Quality, 2004 (Act No. 39 of 2004) will be required for the total bulk storage of dangerous goods on the site.

3.20 Pollution Aspects

The risk of pollution on the site can be attributed to operations and leaks from storage, distribution and the general use of chemical substances, cleaning agents, oils and other fuels stored on the site. Practical measures to be implemented to reduce such risks focusses on the implementation of various levels of protection, monitoring and an adherence to relevant industry practices and international airport development guidelines. These measures will ensure that any impacts on groundwater users in the local areas associated with accidental leaks and spillages will be of 'Low' negative significance. These mitigation measures have been included in the EMPr.

3.21 Health Impacts

Based on the predicted 1-hour maximum ground-level concentration contours and the cumulative concentration data, the levels for all air pollutants within the site are not expected to reach the Occupational Exposure Limits ("OEL"). The health of workers will, however, depend on other microenvironment conditions. The applicable Occupational Health and Safety Standards and specific requirements for airport workers must be enforced, as required in terms of the relevant enabling provision(s).

3.22 Hazards and Risks

Fire risk management has been identified as one of the key safety considerations for the site. A Fire Management Plan has therefore been developed for the site to effectively deal with such risks. Additionally, the placement of fire water tanks on the site, the inclusion of fire protection measures in the design of buildings, the provision of response vehicles, and personnel trained in firefighting, will be required. Provisions have been made for fire breaks to be established to prevent veldfires on the site. The required removal of alien vegetation on the site that will be undertaken in terms of the Alien Vegetation Management Plan will decrease the intensity of runaway veldfires.

Since off-site incidents may result due to hazards of some of the fuels to be stored on, produced at, or delivered to the site. The main hazards that would occur with a loss of containment of hazardous components on-site include exposure to thermal radiation from fires and overpressure from explosions. The Major Hazard Installation Study (dated 14 August 2024 and compiled by RISCUM (PTY) LTD) found that the facilities at the expanded airport would be classified as a Low Hazard Establishment Major Hazard Installation, resulting in the risks to the general public being considered. Various measures must, however, be implemented to reduce the likelihood and impact of hazards, if it should occur. These measures, as per the provisions of the EMPr, centers around the need for containment of dangerous and other goods as well as adhering to international best practice and industry standards.

Given the nature of the development proposal and the fact that Solar PV panels will be installed on the site, glaring and the risk of exposure to the Air Traffic Control Tower and associated operation of the expanded CWA exist. In order to eliminate glare, the Solar PV panels proposed in the south-eastern portion of the Services Precinct have been removed. According to the Aviation Glint and Glare Assessment Report (dated 4 March 2025 and compiled by Future Impact (Pty) Ltd), the glint and glare impacts will be of 'Very Low' significance. This is considered acceptable in terms of the United States FAA Regulations. Furthermore, it has been recommended that the development proposal receive authorisation from the SACAA from a glint and glare perspective.

The expanded CWA falls outside the Koeberg Nuclear Protection Zone.

3.23 Competition

Since the expanded CWA will be the second commercial airport within the City of Cape Town, competition exists. In this regard, it was argued that the expanded CWA will complement the existing CTIA by providing an injection of needed capacity during peak hours. The location of the site provides more choice as well as a convenient and safe airport option for travelers. Having a city with two airports will result in improved connectivity, increased capacity, operational efficiency, economic benefits, and a more resilient travel experience for passengers. Furthermore, should any one of the airports face operational issues, the option to make use of the other airport exists.

The demand for direct air services at the expanded CWA was informed by research, data and industry consultations. It was forecasted by the Netherlands Airport Consultants that the expanded CWA will process approximately 5 million passengers per annum by 2050 out of the total 20 million passengers travelling to Cape Town. The expanded CWA is therefore forecast to process approximately 25% market share within 25 years, which equates to an increase of 1% per year.

The function of the expanded CWA as an 'alternate' airport will result in additional benefits, including (a) improving the attractiveness of the city to host major events by providing additional airport capacity, (b) continuity of economic activity (trade and tourism) in the event of an extended closure at the CTIA, (c) offering additional temporary- or permanent capacity during peak periods, and (d) countering redundancy in the event of catastrophic fires, structural failures, fuel or power supply interruptions.

Having a second commercial airport will benefit travelers in instances where flights have to be diverted, since the CTIA and the expanded CWA are located only 25km away from each other within the same City. Travelers will therefore reach their intended destination with minimal disruptions. The expanded CWA may relieve any general aviation constraints experienced by CTIA given the latter's core function as a commercial airport where priority is given to the large volume of scheduled airline traffic. The expanded CWA includes the development of required infrastructure that will permit general aviation.

Precedent was used to illustrate other cities that have more than one airport. These cities include, (a) London (Heathrow and Gatwick Airports), (b) New York City (JFK, LaGuardia, and Newark Airports), and (c) Johannesburg (OR Tambo and Lanseria Airports).

According to the Cape Winelands Alternate Aerodrome Feasibility Study (dated 26 April 2024 and compiled by Munich Airport International GmbH), the expanded CWA fulfills the criteria for being a suitable destination alternate for the CTIA. Criteria used to determine this include Operating Hours Compatibility, Take-Off Performance, Landing Performance, Apron/Taxiway Strength at Maximum Taxi Weight and the ICAO's requirements for Rescue and Fire Fighting Services. The said Study confirmed that based on the analysis of meteorological and weather data over the last twenty (20) years, the expanded CWA is very well suited to serve as a destination alternate or fuel ERA aerodrome.

In light of the above, it was concluded that the expanded CWA will enable economic benefits and complement the CTIA by boosting the viability, economics and feasibility of routes into the said airport. The two airports can therefore co-exist within the City of Cape Town.

3.24 Service Requirements

Wastewater (Effluent) Treatment:

A wastewater treatment plant to treat sewage generated by the development proposal will be established. The treated effluent will be reused on site for irrigation- and biodigester purposes. This will reduce the need to use potable water on the site. The required authorisation in terms of the National Water Act, 1998 (Act No. 36 of 1998) must be obtained from the Competent Authority.

Electricity:

The site currently contains an existing 66 kilovolts Eskom supply, which will be upgraded to support the expanded CWA. According to the correspondence from Eskom (dated 4 March 2025), capacity exists to provide a 5-MVA load. The bulk mains electrical supply will be connected to the Eskom Grid via an overhead 66,000- Volt three cable. Mini-substations will be established around the site, allowing for site-wide distribution. The final load requirements will be achieved over time and be supported with the installation of renewable energy sources, *i.e.*, Solar PV and biodigester, on the site. Biogas production will be continuous and store gas in gas bladders protected by inflated domes.

Provisions will be made for battery energy storage in terms of the Solar PV facility. This will be in the form of containerised outdoor enclosures located close to the PV Power Source(s).

Water:

Potable water will be provided through treated groundwater abstracted from boreholes located on the site and supplemented by the City of Cape Town. According to the Borehole Yield and Quality Testing Report (dated 14 April 2022 and compiled by GEOSS South Africa (Pty) Ltd), groundwater will be treated at a new treatment facility proposed on the site. The National DWS will consider the results contained in the Geohydrological Assessment Report (dated 28 February 2025 and compiled by GEOSS South Africa (Pty) Ltd) that accompanied the groundwater use license / Water Use License Application.

The correspondence from the City of Cape Town (dated 9 July 2025) confirms that there is sufficient infrastructure capacity to support the development proposal. The City of Cape Town's bulk supply system has sufficient water resources, treatment, bulk storage and conveyance capacity to supply the expanded CWA with the estimated average daily demand of 399.0kl/day. The integration of Treated Sewage Effluent ("TSE") from the on-site wastewater treatment plant for all non-potable uses will significantly reduce the burden on potable water resources. The combined potable water supply from the City of Cape Town and the on-site borehole fulfills the projected daily demand for potable water.

Sewage Management and Treatment:

Various options for sewage management and treatment were considered. Ultimately, the preferred option entails sewage discharge to be treated via a dual-treatment approach. Sewage will be diverted through a pump system to a proposed on-site package treatment plant. This plant will treat the sewage to a standard suitable for non-potable water use, such as irrigation or flushing. The remaining sewage will be directed to the nearby Fisantekraal WWTW for further treatment and disposal. The correspondence from the City of Cape Town (dated 13 May 2025) indicated that this approach is feasible and in terms of wastewater treatment requirements, the Fisantekraal WWTW has sufficient unallocated capacity to accommodate additional influent.

The key components to form part of the sewage management and treatment includes, internal sewer network to convey sewage, a lifting station to divert a portion of sewage to a package sewage treatment plant, a primary sewer pump station to direct the remaining sewage to the Fisantekraal WWTW via a pump and rising main, a sludge processing area, an emergency overflow pond and an emergency overflow to the primary sewer pump station from the package treatment plant. The wastewater treatment from the on-site package treatment plant itself is potential source of pollution. In order to limit this, it was decided that instead of using chicken manure as a feedstock, the feed stream will be composed of treated effluent from the WWTW, cultivated biomass / energy crop and organic waste from the site.

Solid Waste Management:

Waste at various stages of construction and operation will be generated. A Waste Management Plan will be implemented to manage the waste generated on-site according to the applicable requirements.

'Waste' from the biodigester plant comprises 'liquid fertilizer', which will be distributed to local farms within a 40km radius of the plant.

A Waste Management Plan, which outlines the waste streams during the construction and operational phases, monitoring requirements, responsibilities associated with waste management on site and potential impacts will be implemented. The Waste Management Plan will further ensure that the requirements, as per the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) are adhered to.

During the construction phase, waste generated will, as far as possible, be re-used and recycled in order to reduce waste to landfill. The need to reduce, reuse and recycle waste forms part of the provisions of the EMP. The same approach will be implemented during the operational phase with respect to the reduce, reuse and recycling waste, as per the relevant provisions of the EMP.

Waste trucks entering and exiting the site will potentially emit foul-smelling odours. In addition, active composting, organic piles emit volatile compounds. Hence, essential measures forms part of this Decision in order to mitigate such impacts (refer to Condition 24). Measures are similarly be implemented to ensure that waste management mitigates dust, noise and visual impacts.

The correspondence from the City of Cape Town (dated 13 May 2025) indicated that sufficient unallocated capacity exists to accept, collect, and dispose of all types of waste to a designated licensed landfill site.

Stormwater Management:

Existing drainage routes and attenuation ponds will be retained and incorporated into the stormwater management system. New stormwater management infrastructure comprises of a stormwater drainage network that is based on a dual stormwater system, consisting of a major and a minor network, conveying stormwater generated on site via pipes and overland flow routes, dry attenuation ponds with engineered layer works and a wet detention pond. In order to address the potential attraction of avifauna to the ponds, all ponds have been designed as dry ponds, except for one, i.e., the rehabilitated quarry, which has a permanent water body. Other options to further mitigate any impacts in this regard include, *inter alia*, covering the exposed water surface area (rehabilitate quarry) and maintaining consistency in planting vegetation on either side of the ponds to discourage bird movement between ponds. Measures will be implemented to ensure all ponds are suitably maintained and appropriately monitored.

The minor stormwater system will include open drains, an underground piped network complete with channels, inlet catchpits, oil separators, manholes and outlet structures. The major stormwater system will comprise of roads and on-site overland flow paths, which will operate in conjunction with the minor system.

The overland flow routes on the site will be designed to safely convey the 1:100-year storm event towards the ponds situated along the boundary of the site. From there, formal overland escape routes, in the form of pond overflows, will be designed to convey peak runoff from the 1:100-year storm, which cannot be handled by the stormwater system before discharging into the adjacent infrastructure.

A Stormwater Management Plan approved by the City of Cape Town must be implemented to adequately manage stormwater and avoid, or if not possible, mitigate the associated stormwater-related impacts (refer to Condition 37).

Fuel requirements:

A new fuel depot with a total storage capacity of approximately 2 000m³ (to ensure 7 days of buffer stock) will be located, as close as possible, to the apron stands and include service roads for road tankers to limit interactions with- and impact on airport traffic. Standard measures to mitigate the associated impacts that will be implemented include, *inter alia*, the use of concrete-bunded areas for secondary containment and double

walled tanks. In addition, a retail fuel service station will be developed with a total storage capacity of approximately 92m³ (petrol and diesel) together with the associated infrastructure.

3.25 Traffic Impacts

The site is well-served by an extensive road network, which connects to both north-south and east-west highways, providing efficient routes to the broader Western Cape. By distributing passenger traffic across two airports, road congestion around the airports would be reduced, making it easier for passengers to reach their flights on time. Future land use projections and approved future planned developments in the immediate surrounds of the site influence future Municipal road network. The expanded CWA will require the amendment of east-west links traversing the site and the links in the north of the site.

The various access opportunities to the road network system that are available include, (a) the existing Melish Road (OP 6/8) connection onto Lichtenberg Road, (b) the future Class 3 Lucullus Road extension, and (c) the future Class 3 Melish Road extension through the Bella Riva residential development. It was determined that option (a) is the most viable, since the other access opportunities will require more co-operation and agreements between relevant and affected landowners. The existing Melish Road (OP 6/8) connection onto Lichtenberg Road will take place in a phased approach. The area east of the new runway will be accessed from Lichtenberg Road (R312 Regional Road).

According to the Transport Impact Assessment Report (dated June 2025 and compiled by Innovative Transport Solutions) to gain specific trip generation rates, cordon counts were conducted around the CTIA. Based on these cordon counts, 136.34 trips per million annual airline passengers were calculated for weekday AM peak hour and 253.64 trips per million annual airline passengers were calculated for weekday PM peak hour.

Taking into consideration the horizon years for the development proposal, it was estimated that by 2032, 601 in total (467 in / 134 out) weekday AM peak hour trips and 1 199 in total (659 in / 540 out) weekday PM peak hour will be generated. By 2050, 1 314 in total weekday AM peak hour: (1 004 in / 310 out) and 228 total (1 151 in / 1 077 out) weekday PM peak hour trips will be generated.

Based on these figures and the existence of multiple access points to the site, it is estimated that single-lane roads with dedicated turning lanes should be able to accommodate the vehicle demand. However, multi-lane roads must be constructed for the main public circulation route for more ideal vehicular flow and planning of road reserves should make allowance for dualling when necessary. As with other airports, it is expected that public transport to- and from the expanded CWA will utilise 'drop-and-go' routes linking with the public transport.

In terms of the internal road requirements and parking, two lanes per direction, includes controlled access points to restricted areas and space for U-turns in front of any controlled access points. The main road circulating adjacent to the terminals and parking areas will include dedicated public transport, e-hailing and passenger vehicle 'stop-and-go' zones. A minimum of 1 705 parking bays will be provided for Phase 1 and the provision of additional parking bays thereafter will be provided in response to increased demand. Parking will be provided in various restricted areas of the expanded CWA, as and when required.

The EMPr contains provisions to mitigate and manage the associated traffic impacts during the construction phase. It is particularly required that deliveries be scheduled outside peak hours to prevent congestion during peak periods. It must at the same time be noted that material will largely be sourced from existing quarries (mostly located west of the site), whilst most of the earthworks will be done on-site to balance cut and fill areas.

Based on the above, the said Assessment Report concluded that the expanded CWA can be approved from a transport point of view.

3.26 Other Aspects

The EMPr contains other standard provisions such most notably best practices to ensure that construction impacts relating to traffic, visual, health and safety, waste and socio-economic impacts are adequately managed and mitigated.

3.27 Socio-economic Impacts

According to the Socio-Economic Impact Assessment Report (dated 30 May 2025 and compiled by Dr. Jonathan Bloom), the most significant socio-economic benefit from the development proposal is the anticipated contribution to the aviation industry in the Western Cape. More specially, an estimated R8,9 billion in capital investment could generate R23,1 billion in new business sales, which could add R8,8 billion (net of the import leakage) to the Gross Geographic Product ("GGP") of the Western Cape economy during the construction phase alone. During an initial 20-year operational period, an estimated R36,1 billion in nominal terms could generate R76,1 billion in new business sales.

The conversion of the land particularly where wheat production takes place is expected to reduce employment from 20 to 12 permanent opportunities. This impact was not deemed significant due to new employment opportunities that expanded CWA will provide and the capital injection into the remainder of the farm during both construction- and operational phases. In this regard, the development proposal could sustain approximately 32 433 (direct, indirect, and induced) employment opportunities during construction, including ongoing capital expenditure upgrades over a twenty (20) year period. This could increase household incomes by R3,8 billion over 22 years. During the initial 20 years operational phase, the development proposal could sustain about 102 732 direct, indirect, and induced employment opportunities, adding R17,7 billion in household income. According to the said Assessment Report, the positive impacts include skills development and training, small business development and capacity building in the local area. In terms of the provisions of the EMPr, benefits of these positive impacts will be aimed at enhancing gender equality through the recruitment processes and appointment of local contractors during the tender process.

During the construction phase, positive impacts includes (a) creating new employment opportunities (as mentioned above) and (b) economic income.

During the construction phase, negative impacts include (a) increased vehicular traffic flows, (b) nuisance factors, such as dust and noise, (c) an influx of job seekers and (d) potential increase in local crime.

During the operational phase, positive impacts include (a) creating new employment opportunities (as mentioned above), (b) economic income, (c) creating new business opportunities, and (d) revenue accruing to local authorities.

During the operational phase, the negative impacts include (a) vehicular traffic flows, (b) nuisance factors, such as dust and noise, (c) potential increase in local crime, (d) risk of new or expanded informal settlements (potential), (e) altered sense of place, (f) impacting nearby farming and business operations (g) affects surrounding land values, and (h) increased demand for bulk infrastructure and servicing.

Whilst potential negative impacts have been identified, the said Assessment Report determined that with proper management and the implementation of all mitigation measures recommended by specialists, the socio-economic impact is deemed to be of 'Low' to 'Moderate' significance. According to the said Assessment Report, the analysis indicates that the socio-economic benefits would outweigh the potential socio-economic costs of the expanded CWA.

The development proposal will result in both negative and positive impacts.

Negative Impacts include the following:

- Temporary nuisance related impacts during the construction phase;
- Loss of and impact on aquatic features;
- Loss of and impact on biodiversity features;
- Impact on faunal species;
- Increased demand for services;
- Increased traffic to and from the site;
- Increased air emissions;
- Increased noise levels;
- Increased lighting in the local area;
- Additional market share in the aviation sector;
- Additional activity in the controlled airspace;
- Conversion of agricultural land;
- Increased anthropogenic activities in and around the site;
- Visual alteration of the site; and
- Alteration of the local 'Sense of Place'.

Positive Impacts include the following:

- Employment opportunities;
- Various socio-economic spinoffs;
- Varied/additional air travel options;
- Infrastructure to support the travel and tourism industry;
- Fiscal contribution towards the local economy;
- Fiscal contribution towards the regional economy; and
- Beneficial activation of a partially fallow site.

4. National Environmental Management Act, 1998 (Act No. 107 of 1998) Principles

The National Environmental Management Principles (set out in Section 2 of the NEMA, which apply to the actions of all Organs of State, serve as guidelines by reference to which any Organ of State must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment), *inter alia*, provides for:

- the effects of decisions on all aspects of the environment to be taken into account;
- the consideration, assessment and evaluation of the social, economic and environmental impacts of activity (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment;
- the co-ordination and harmonisation of policies, legislation and actions relating to the environment;
- the resolving of actual or potential conflicts of interest between Organs of State through conflict resolution procedures; and
- the selection of the best practicable environmental option.

5. Conclusion

In view of the above, the NEMA principles, compliance with the conditions stipulated in this Environmental Authorisation, and compliance with the EMP, the Competent Authority is satisfied that the authorised Listed Activities will not conflict with the general objectives of Integrated Environmental Management stipulated in Chapter 5 of the NEMA and that any potentially detrimental environmental impacts resulting from the undertaking of the Listed Activities can be mitigated to acceptable levels.

-----END-----

Appendix A: The obstacles that must be clearly marked with day- and night markings:

SURFACE	TARGET	OBSTACLE	PENETRATION	LATITUDE	LONGITUDE	ELEVATION
Balked Landing	01	_RWY21 PP5	-15.043	S 33° 45' 32.9882"	E 018° 44' 10.2920"	124.161
Inner transitional	01	_HANGER_A1	-4.492	S 33° 46' 15.2485"	E 018° 44' 29.1453"	133.502
Inner transitional	01	_PP1	-9.011	S 33° 45' 54.6489"	E 018° 44' 22.1157"	126.789
Strip	01-19	_FUEL FARM	-10.055	S 33° 46' 15.8166"	E 018° 44' 31.0346"	130.433
Strip	01-19	_HANGER_2	-5.676	S 33° 46' 13.9655"	E 018° 44' 29.9791"	125.507
Strip	01-19	_HANGER_A1	-13.381	S 33° 46' 15.2485"	E 018° 44' 29.1453"	133.502
Strip	01-19	_MET STATION	-14.495	S 33° 46' 04.8552"	E 018° 44' 23.1048"	131.535
Strip	01-19	_PP1	-12.493	S 33° 45' 54.6489"	E 018° 44' 22.1157"	126.789
Strip	01-19	_PP2	-11.716	S 33° 45' 55.5070"	E 018° 44' 23.9162"	126.341
Strip	01-19	_RWY21 PP2	-12.826	S 33° 45' 34.6972"	E 018° 44' 18.0334"	121.635
Strip	01-19	_RWY21 PP3	-14.229	S 33° 45' 34.0683"	E 018° 44' 15.1213"	122.707
Strip	01-19	_RWY21 PP4	-15.732	S 33° 45' 33.5537"	E 018° 44' 12.8416"	123.945
Strip	01-19	_RWY21 PP5	-16.242	S 33° 45' 32.9882"	E 018° 44' 10.2920"	124.161
Strip	01-19	_RWY21_TREE1	-25.23	S 33° 45' 44.8538"	E 018° 44' 18.5602"	136.744
Strip	01-19	_T64_BLD	-7.88	S 33° 45' 53.9976"	E 018° 44' 22.6102"	122.033
Strip	01-19	_T65_BLD	-7.875	S 33° 45' 51.4390"	E 018° 44' 19.5945"	121.182
Strip	01-19	_TREE_1	-14.034	S 33° 46' 16.9969"	E 018° 44' 32.0501"	134.781
Strip	01-19	_TREE_2	-16.232	S 33° 46' 16.9874"	E 018° 44' 32.1565"	136.983
Strip	01-19	_WINDSOCK MID	-9.089	S 33° 46' 19.7678"	E 018° 44' 25.8315"	130.212
Transitional	01	_HANGER_3	-6.551	S 33° 46' 14.7972"	E 018° 44' 32.4135"	129.829
Transitional	01	_PP3	-10.472	S 33° 45' 55.9201"	E 018° 44' 25.9506"	126.209
Transitional	01	_RWY21 PP1	-4.867	S 33° 45' 35.3422"	E 018° 44' 20.9663"	119.841
Transitional	01	_TANK_2	-0.22	S 33° 46' 13.7969"	E 018° 44' 34.6868"	132.567
Transitional	01	_TREE_3	-8.038	S 33° 46' 17.0056"	E 018° 44' 34.0187"	135.272
Transitional	01	_WATER TANK	-2.685	S 33° 46' 11.0727"	E 018° 44' 32.7418"	130.280
Transitional	01	_HANGER_A4	-4.349	S 33° 46' 12.4504"	E 018° 44' 31.5988"	126.649
Transitional	01	_OFFICE	-5.433	S 33° 46' 11.9595"	E 018° 44' 31.7976"	128.865
Balked Landing	19	_PP1	-1.249	S 33° 45' 54.6489"	E 018° 44' 22.1157"	126.789
Balked Landing	19	_RWY21_TREE1	-21.698	S 33° 45' 44.8538"	E 018° 44' 18.5602"	136.744
TOFPA	19	_W_RESERVOIR	-3.994	S 33° 47' 33.2716"	E 018° 44' 46.1067"	151.944
Transitional	19	_HANGER_3	-6.551	S 33° 46' 14.7972"	E 018° 44' 32.4135"	129.829
Transitional	19	_PP3	-10.472	S 33° 45' 55.9201"	E 018° 44' 25.9506"	126.209
Transitional	19	_RWY21 PP1	-4.867	S 33° 45' 35.3422"	E 018° 44' 20.9663"	119.841
Transitional	19	_TANK_2	-0.22	S 33° 46' 13.7969"	E 018° 44' 34.6868"	132.567
Transitional	19	_TREE_3	-8.038	S 33° 46' 17.0056"	E 018° 44' 34.0187"	135.272

Transitional	19	_WATER TANK	-2.685	S 33° 46' 11.0727"	E 018° 44' 32.7418"	130.280
Transitional	19	_HANGER_A4	-4.349	S 33° 46' 12.4504"	E 018° 44' 31.5988"	126.649
Transitional	19	_OFFICE	-5.433	S 33° 46' 11.9595"	E 018° 44' 31.7976"	128.865
Take-off Climb	14	_RWY32_TREE4	-11.374	S 33° 46' 28.5783"	E 018° 44' 52.6322"	141.078
Take-off Climb	14	_RWY32_TREE5	-4.528	S 33° 46' 28.3862"	E 018° 44' 53.6418"	135.288
Take-off Climb	14	_RWY32_TREE6	-2.914	S 33° 46' 28.0738"	E 018° 44' 55.0798"	135.154
TOFPA	14	_RWY32 F1	-1.487	S 33° 46' 26.0294"	E 018° 44' 49.0623"	126.269
TOFPA	14	_RWY32_TREE2	-15.309	S 33° 46' 28.8997"	E 018° 44' 50.7390"	141.005
TOFPA	14	_RWY32_TREE3	-15.126	S 33° 46' 28.7279"	E 018° 44' 51.7451"	141.078
TOFPA	14	_RWY32_TREE4	-14.901	S 33° 46' 28.5783"	E 018° 44' 52.6322"	141.078
TOFPA	14	_RWY32_TREE5	-8.857	S 33° 46' 28.3862"	E 018° 44' 53.6418"	135.288
TOFPA	14	_RWY32_TREE6	-8.368	S 33° 46' 28.0738"	E 018° 44' 55.0798"	135.154
TOFPA	14	_RWY32_TREE1	-9.958	S 33° 46' 29.1705"	E 018° 44' 49.1117"	135.239
Strip	14-32	_RWY32 F1	-1.679	S 33° 46' 26.0294"	E 018° 44' 49.0623"	126.269
Transitional	14	_TREE_1	-2.608	S 33° 46' 16.9969"	E 018° 44' 32.0501"	134.781
Transitional	14	_TREE_2	-4.519	S 33° 46' 16.9874"	E 018° 44' 32.1565"	136.983
Transitional	14	_WINDSOCK MID	-0.394	S 33° 46' 19.7678"	E 018° 44' 25.8315"	130.212
Approach	32	_RWY32_TREE4	-11.374	S 33° 46' 28.5783"	E 018° 44' 52.6322"	141.078
Approach	32	_RWY32_TREE5	-4.528	S 33° 46' 28.3862"	E 018° 44' 53.6418"	135.288
Approach	32	_RWY32_TREE6	-2.914	S 33° 46' 28.0738"	E 018° 44' 55.0798"	135.154
Transitional	32	_RWY32_TREE2	-9.558	S 33° 46' 28.8997"	E 018° 44' 50.7390"	141.005
Transitional	32	_RWY32_TREE3	-12.119	S 33° 46' 28.7279"	E 018° 44' 51.7451"	141.078
Transitional	32	_TREE_1	-2.608	S 33° 46' 16.9969"	E 018° 44' 32.0501"	134.781
Transitional	32	_TREE_2	-4.519	S 33° 46' 16.9874"	E 018° 44' 32.1565"	136.983
Transitional	32	_WINDSOCK MID	-0.394	S 33° 46' 19.7678"	E 018° 44' 25.8315"	130.212
Inner Horizontal	FAWN	_RWY01_PYLON MID1	-6.241	S 33° 48' 03.3797"	E 018° 45' 25.0766"	145.591
Inner Horizontal	FAWN	_RWY01_PYLON MID2	-10.101	S 33° 48' 03.9818"	E 018° 45' 09.9010"	149.451
Inner Horizontal	FAWN	_RWY01_PYLON MID3	-7.808	S 33° 48' 04.5311"	E 018° 44' 56.6150"	147.158
Inner Horizontal	FAWN	_RWY32_TREE2	-1.655	S 33° 46' 28.8997"	E 018° 44' 50.7390"	141.005
Inner Horizontal	FAWN	_RWY32_TREE3	-1.728	S 33° 46' 28.7279"	E 018° 44' 51.7451"	141.078
Inner Horizontal	FAWN	_RWY32_TREE4	-1.728	S 33° 46' 28.5783"	E 018° 44' 52.6322"	141.078
Inner Horizontal	FAWN	_STEEL TANK	-3.989	S 33° 46' 48.8511"	E 018° 43' 58.7999"	143.339
Inner Horizontal	FAWN	_W_RESEVOIR	-12.594	S 33° 47' 33.2716"	E 018° 44' 46.1067"	151.944
Conical	FAWN	_TRANS_1 TWR	-83.139	S 33° 47' 21.1688"	E 018° 41' 46.3120"	247.647
Conical	FAWN	_TRANS_2 TWR	-87.374	S 33° 47' 14.2176"	E 018° 41' 41.2943"	254.510
Conical	FAWN	_TRANS_3 TWR	-81.581	S 33° 47' 18.4075"	E 018° 41' 32.9621"	260.895

From: <amanda@phsconsulting.co.za>

Date: Thu, 30 Oct 2025 at 10:59

Subject: NOTIFICATION - ENVIRONMENTAL AUTHORISATION GRANTED FOR
PROPOSED EXPANSION OF CAPE WINELANDS AIRPORT (DEA&DP ref:
16/3/3/2/A5/20/2046/24)

To: <amanda@phsconsulting.co.za>

Dear Registered Interested and Affected Party,

Notice is hereby given, in terms of the National Appeal Regulations, 2025, that Environmental Authorisation (EA) was granted and issued on 27 October 2025 by the Western Cape Government, Environmental Affairs and Development Planning (DEA&DP) for the Proposed Expansion of the Existing Cape Winelands Airport on P10 of Farm 724, RE of Farm 724, P23 of Farm 724, P7 of Farm 942, RE of Farm 474, P3 of Farm 474 and P4 of Farm 474, Fisantekraal, Durbanville.

The Environmental Authorisation (EA) is attached to this email and available on our website at download link <https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/>, and a hard copy has been lodged at the Fisantekraal Public Library (021 444 9259). Please refer to the attached letter for more detail on the EA and the appeal process.

Best wishes

Amanda

Amanda Fritz-Whyte

BSc; BSc (Hons) Geology; MSc Water Resource Management

Fellow Member WISA

Lead: Climate Change Division WISA

Member IAIAAsa

Registered Environmental Assessment Practitioner: Number 2019/367 (EAPASA)

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Corporate responsibility: www.africanvisionfoundation.co.za

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.

Celine Oates

From: Celine Oates
Sent: Wednesday, November 19, 2025 9:48 PM
To: d.cloete@capewinelands.aero
Cc: Richard Summers; Reception – Richard Summers Inc.; Clarice Arendse; Shreea Maharaj
Subject: RE: APPEAL IN TERMS OF SECTION 43 OF NEMA AGAINST THE ENVIRONMENTAL AUTHORISATION GRANTED FOR THE DEVELOPMENT OF THE CAPE WINELANDS AIRPORT UNDER DEADP REFERENCE NUMBER 16/3/3/2/A5/20/2046/24
Attachments: 4 Aviators Director's Resolution.pdf; AeroSport Director's Resolution.pdf; CTFTC Director's Resolution.pdf; Diepkloof Directors Resolution.pdf; Helivate Directors Resolution.pdf; CWA Tenants_Appeal Statement_19.11.25_Final.pdf; Annexure A_EA.pdf; Annexure B_Notification of EA_2.pdf

Dear Applicant

We refer to the above matter and confirm that we act on behalf of:

1. Cape Town Flight Training Centre (Pty) Ltd;
2. Diepkloof Aircraft Maintenance CC;
3. 4 Aviators (Pty) Ltd;
4. Helivate Helicopter Services (Pty) Ltd; and
5. WCMS CC T/A AeroSport.

We hereby notify you of the appeal against the abovementioned environmental authorisation, and attach hereto the following documentation in this regard:

1. A Resolution of Directors of the various entities;
2. RS Inc Appeal Statement on the Appellants dated 19 November 2025; and
3. Annexures A and B.

We shall be most grateful if you would confirm receipt hereof.

Kind regards,

Celine Oates
RICHARD SUMMERS INC.
Candidate Attorney



Office +27 21 891 4402
Mobile +27 71 868 8101

Unit 126, Victoria Junction, 57 Prestwich Street, De Waterkant, Cape Town

RESOLUTION OF DIRECTORS OF CAPE TOWN FLIGHT TRAINING CENTRE (PTY) LTD

I, the undersigned, **FINDLAY SMITH**, duly authorised Director of Cape Town Flight Training Centre (Pty) Ltd (Registration Number 2003/009605/23) ("the Company") by General Resolution adopted by the Board of Directors hereby adopt the following resolution in accordance with the provisions of section 74 of the Companies Act 71 of 2008, as amended, and the Memorandum of Incorporation of Cape Town Flight Training Centre (Pty) Ltd. The Resolution shall be of the same force and effect as if it had been approved by way of voting at a meeting of the Directors of the Organisation duly convened, constituted and held.

1. GENERAL

- 1.1. The Company is assigning authority to Richard Summers Incorporated (Registration No. 2017/536164/21) to appeal against the granting of an Environmental Authorisation 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 existing 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.

2. RESOLUTION

IT IS RESOLVED THAT:

- 2.1. Richard William Summers (Identity Number: 730105 5065 085) of Richard Summers Incorporated be and is hereby authorised, on behalf of Cape Town Flight Training Centre (Pty) Ltd, to do or cause all such things to be done, to sign all documentation as may be necessary, to give effect to the abovementioned appeal process;
- 2.2. Any actions which have thus far been taken in relation to giving effect to this written resolution be and hereby are retrospectively approved and ratified in their entirety; and
- 2.3. This resolution shall constitute a Resolution in writing for the purposes of the Memorandum of Incorporation of the Company.


Name: _____

SIGNED AT Aurora ON THIS 19th DAY OF November
2025.

RESOLUTION OF DIRECTORS

I, the undersigned, N.W.J. KLEINMAN, duly authorised Director of DIEPSTOF AIRCRAFT MAINTENANCE (Registration Number 1997/62715/23) ("the Company") by General Resolution adopted by the Board of Directors hereby adopt the following resolution in accordance with the provisions of section 74 of the Companies Act 71 of 2008, as amended, and the Memorandum of Incorporation of The Resolution shall be of the same force and effect as if it had been approved by way of voting at a meeting of the Directors of the Organisation duly convened, constituted and held.

1. GENERAL

- 1.1. The Company is assigning authority to Richard Summers Incorporated (Registration No. 2017/536164/21) to appeal against the granting of an Environmental Authorisation 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 existing 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.

2. RESOLUTION

IT IS RESOLVED THAT:

- 2.1. Richard William Summers (Identity Number: 730105 5065 085) of Richard Summers Incorporated be and is hereby authorised, on behalf of DIEPSTOF AIRCRAFT MAINTENANCE, to do or cause all such things to be done, to sign all documentation as may be necessary, to give effect to the abovementioned appeal process;
- 2.2. Any actions which have thus far been taken in relation to giving effect to this written resolution be and hereby are retrospectively approved and ratified in their entirety; and
- 2.3. This resolution shall constitute a Resolution in writing for the purposes of the Memorandum of Incorporation of the Company.

N.W.J. KLEINMAN
Name:

SIGNED AT CAPE WINELANDS AIRPORT ON THIS 19 DAY OF NOVEMBER 2025.
2025.

RESOLUTION OF DIRECTORS

I, the undersigned,.....Gerhard Mew....., duly authorised Director of
4 Aviators PTY Ltd..... (Registration Number 2107/296100/07.....) ("the
Company") by General Resolution adopted by the Board of Directors hereby adopt the following
resolution in accordance with the provisions of section 74 of the Companies Act 71 of 2008, as
amended, and the Memorandum of Incorporation of The
Resolution shall be of the same force and effect as if it had been approved by way of voting at a
meeting of the Directors of the Organisation duly convened, constituted and held.

1. GENERAL

- 1.1. The Company is assigning authority to Richard Summers Incorporated (Registration No. 2017/536164/21) to appeal against the granting of an Environmental Authorisation 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 existing 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.

2. RESOLUTION

IT IS RESOLVED THAT:

- 2.1. Richard William Summers (Identity Number: 730105 5065 085) of Richard Summers Incorporated be and is hereby authorised, on behalf of 4 Aviators....., to do or cause all such things to be done, to sign all documentation as may be necessary, to give effect to the abovementioned appeal process;
- 2.2. Any actions which have thus far been taken in relation to giving effect to this written resolution be and hereby are retrospectively approved and ratified in their entirety; and
- 2.3. This resolution shall constitute a Resolution in writing for the purposes of the Memorandum of Incorporation of the Company.

Gerhard Mew

Name:

SIGNED AT Cape Town ON THIS 19 DAY OF November
2025.



RESOLUTION OF DIRECTORS

I, the undersigned, HAYLEY CUMMING, duly authorised Director of HELIVATE HELICOPTER SERVICES (PTY) LTD (Registration Number 2013/019844/07) ("the Company") by General Resolution adopted by the Board of Directors hereby adopt the following resolution in accordance with the provisions of section 74 of the Companies Act 71 of 2008, as amended, and the Memorandum of Incorporation of HELIVATE HELICOPTER SERVICES (PTY) LTD. The Resolution shall be of the same force and effect as if it had been approved by way of voting at a meeting of the Directors of the Organisation duly convened, constituted and held.

1. GENERAL

- 1.1. The Company is assigning authority to Richard Summers Incorporated (Registration No. 2017/536164/21) to appeal against the granting of an Environmental Authorisation 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 existing 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.

2. RESOLUTION

IT IS RESOLVED THAT:

- 2.1. Richard William Summers (Identity Number: 730105 5065 085) of Richard Summers Incorporated be and is hereby authorised, on behalf of HELIVATE HELICOPTER SERVICES (PTY) LTD, to do or cause all such things to be done, to sign all documentation as may be necessary, to give effect to the abovementioned appeal process;
- 2.2. Any actions which have thus far been taken in relation to giving effect to this written resolution be and hereby are retrospectively approved and ratified in their entirety; and
- 2.3. This resolution shall constitute a Resolution in writing for the purposes of the Memorandum of Incorporation of the Company.

HAYLEY CUMMING

Name:

SIGNED AT KRUGERSDORP ON THIS 19th DAY OF NOVEMBER
2025.

RESOLUTION OF DIRECTORS

I, the undersigned, Louis van Wyk, duly authorised Director of WCMS cc T/A Aerosport (Registration Number CAA-1071-ATO) ("the Company") by General Resolution adopted by the Board of Directors hereby adopt the following resolution in accordance with the provisions of section 74 of the Companies Act 71 of 2008, as amended, and the Memorandum of Incorporation of The Resolution shall be of the same force and effect as if it had been approved by way of voting at a meeting of the Directors of the Organisation duly convened, constituted and held.

1. GENERAL

- 1.1. The Company is assigning authority to Richard Summers Incorporated (Registration No. 2017/536164/21) to appeal against the granting of an Environmental Authorisation 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 existing 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.

2. RESOLUTION

IT IS RESOLVED THAT:

- 2.1. Richard William Summers (Identity Number: 730105 5065 085) of Richard Summers Incorporated be and is hereby authorised, on behalf of Aerosport, to do or cause all such things to be done, to sign all documentation as may be necessary, to give effect to the abovementioned appeal process;
- 2.2. Any actions which have thus far been taken in relation to giving effect to this written resolution be and hereby are retrospectively approved and ratified in their entirety; and
- 2.3. This resolution shall constitute a Resolution in writing for the purposes of the Memorandum of Incorporation of the Company.



Name:

SIGNED AT FAWN ON THIS 19 DAY OF 2025
2025.

APPEAL 5

APPELLANT: RICHARD SUMMERS INC ON BEHLAF OF GARDEN CITIES NPC (RF)

DATE RECEIVED:
19 NOVEMBER 2025



APPEAL FORM

In terms of the National Appeal Regulations

April 2019

Form Number: 2019

Note that:

1. This appeal must be submitted within **20 days** of being notified of the decision.
 2. This form is current as of **April 2019**. It is the responsibility of the Appellant to ascertain whether subsequent versions of the form have been released by the Appeal Administrator.
 3. This form must be used for appeals submitted in terms of National Appeal Regulations, 2014 in so far as it relates to decisions in terms of the:
 - a. Environment Conservation Act, 1989 (Act No. 73 of 1989);
 - b. National Environmental Management Act, 1998 (Act No. 107 of 1998);
 - c. National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004);
 - d. National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004);
 - e. National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008); and subordinate legislation made in terms of these laws.
 4. The required information must be inserted within the spaces provided in the form. The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided. The spaces may be expanded where necessary.
 5. Unless protected by law, all information contained in, and attached to this application, will become public information on receipt by the Department.
 6. A digital copy of this form may be obtained from the Department's website at <http://www.capecapeway.gov.za/dept/eadp>.
 7. Please consult the National Appeal Regulations (dated 8 December 2014) and the Department's Circular EADP 0028/2014 on the "One Environmental Management System" and the EIA Regulations (dated 9 December 2014), and any other relevant regulations.
-

A. DECISION BEING APPEALED

1. Reference Number of the Decision being appealed:

_____16/3/3/2/A5/20/2046/24_____

2. Type of Decision being appealed (please circle the appropriate option):

Environmental Authorisation	24G Administrative Fine	Amendment of Environmental Authorisation	Amendment of Environmental Management Programme	Waste Management Licence	Atmospheric Emission Licence	Exemption Notice
Permit in terms of NEM: BA	Administrative Notice/ Directive	ECA: OSCA Permit	Other			

3. Brief Description of the Decision:

_____Environmental Authorisation for the Cape Winelands Airport development_____

4. Date of the decision being appealed (i.e. date on which the decision was made):

_____17 October 2025_____

B. APPELLANT'S INFORMATION

5. Please circle the appropriate option

Applicant	State Department / Organ of State	Interested and Affected Party

6. Appellant's information:

Name: Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025

Address:

Tel: _____ Cell: _____

Fax: _____ Email: _____

C. APPEAL INFORMATION

7. Did you lodge an Appeal submission within 20 days of the notification of the decision being sent to you?

Yes / **No** (Circle the appropriate response). If "Yes", attach a copy herewith.

8. The following documents must accompany the appeal submission, kindly indicate if they have been attached to the submission:

- 8.1 a statement setting out the grounds of appeal?;

Yes / **No** (Circle the appropriate response)

- 8.2 supporting documentation which is referred to in the appeal submission?;

Yes / **No** (Circle the appropriate response)

- 8.3 a statement, including supporting documentation, by the appellant that a copy of the appeal was submitted to the applicant, any registered interested and affected party and any organ of state with interest in the matter within 20 days from:

- 8.3.1 the date that the notification of the decision was sent to the registered interested and affected parties by the applicant.

Yes / **No** (Circle the appropriate response).

Please indicate the date on which a copy of the Notice of the decision was sent. 30 October 2025

OR

- 8.3.2 the date that the notification of the decision was sent to the applicant by the competent authority, issuing authority or licensing authority.

Yes / **No** (Circle the appropriate response).

Please indicate the date on which a copy of the Notice of the decision was sent. N/A

D. GROUNDS OF APPEAL

9. Set out the ground/s of your appeal: Clearly list your appeal issues and provide an explanation of why you list each issue.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025_____

- 9.1 Is your appeal based on factors associated with the process that was followed by the applicant/Environmental Assessment Practitioner/Competent Authority in reaching the decision?

Yes / **No** (Circle the appropriate response). Please provide details.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025_____

- 9.2 Is your appeal based on factors associated with matters of unacceptable environmental impacts/extenuating circumstances not taken into account by the Competent Authority?

Yes / **No** (Circle the appropriate response). Please provide details.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025_____

9.3 Have your appeal issues been raised previously in the public participation process?

Yes / **No** (Circle the appropriate response). Please provide details.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025 _____

9.4 Are you fundamentally opposed to the decision (e.g. to any development activity on the site)?

Yes / **No** / **Not applicable** (Circle the appropriate response). Please provide details.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025 _____

9.5 Are you in favour of the decision if your concerns can be remedied by rectifying the process or by mitigating or eliminating an impact/s of the activity/ies?

Yes / **No** / **Not applicable** (Circle the appropriate response). Please provide details.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025 _____

9.6 Please indicate what measures you propose to have your concerns remedied.

_____ Kindly see Richard Summers Inc Appeal Statement dated 19 November 2025 _____

9.7 Does your appeal contain any new information that was not submitted to the Environmental Assessment Practitioner (EAP) / or registered I&APs/ or the competent authority prior to the decision?

Yes / **No** (Circle the appropriate response). If the answer above is "Yes" please explain what this information is and why it should be considered by the Appeal Authority and why it was not made available to the EAP/ or I&AP/ or the competent authority prior to the decision. (Please ensure that the new information is attached hereto.)

E. SUBMISSION ADDRESS

This appeal must be submitted to the Appeal Administrator at the address listed below within 20 days of being notified of the decision:

By post: Attention: Marius Venter
Western Cape Ministry of Local Government, Environmental Affairs &
Development Planning
Private Bag X9186, Cape Town, 8000; or

By facsimile: (021) 483 4174; or

By hand: Attention: Mr Marius Venter (Tel: 021-483 3721)
Room 809, 8th floor Utilitas Building
1 Dorp Street, Cape Town, 8000; or

By e-mail: DEADP.Appeals@westerncape.gov.za

Note: You are also requested to submit an electronic copy (Microsoft Word format) of the appeal and any supporting documents to the Appeal Administrator.



Appellant's signature

19 November 2025
Date



RICHARD SUMMERS INC.
ATTORNEYS

Western Cape Department of Environmental Affairs and
Development Planning
Environmental Planning and Appeals Coordinator
Attention: Mr. Marius Venter

Our ref.: RWS/RNR21-002
DEADP ref.: 16/3/3/2/A5/20/2046/24

Per email: DEADP.Appeals@westerncape.gov.za

19 November 2025

Dear Sirs

RE: APPEAL IN TERMS OF SECTION 43 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT 107 OF 1998 AGAINST THE GRANTING OF AN ENVIRONMENTAL AUTHORISATION 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

[DEADP Reference: 16/3/3/2/A5/20/2046/24]

INTRODUCTION

1. We act on behalf Garden Cities NPC (RF) ("Garden Cities") ("**The Appellant**").
2. The Appellants hereby appeals against the decision by the Western Cape Department of Environmental Affairs and Development Planning ("**DEADP**") dated 17 October 2025 to grant environmental authorisation for the proposed expansion of the Cape Winelands Airport ("**CWA**") under DEADP reference number 16/3/3/2/A5/20/2046/24 ("**EA**"). A copy of the EA is attached hereto as Annexure A. The Appellants were notified of the granting of the EA on 30 October 2025. Proof of notification is attached hereto as Annexure B.
3. The appeal lodged in terms of section 43(1) of the National Environmental Management Act No. 107 of 1998 ("**NEMA**"), read with Chapter 2 of the National Appeal Regulations, 2025, published under NEMA, within 20 calendar days of the date on which the Appellants were notified of the decision i.e. the appeal is submitted within the statutorily prescribed timeframe referred to in Regulation 4(1)(a) of National Appeal Regulations.

Unit 126, Victoria Junction		M: +27 (0)82 534 0328 E: richard@summersinc.co.za
57 Prestwich Street		
De Waterkant, 8001		
Cape Town		

4. The Appellants have complied with the requirement to provide a copy of this appeal to Capewinelands Aero (Pty) Ltd (c/o Mr. Deon Cloete) ("**Applicant**") in this matter as set out in Regulation 4(2)(b) of the National Appeal Regulations. Proof of notification to the Applicant is attached hereto as Annexure C

Ground of appeal 1: Socio-economic impacts

1. As described in detail in the Appellant's Comments¹ during the EIA process, the assessment and quantification of the socio-economic impacts by the EAP and the specialist studies, and particularly the adverse impacts of the CWA Project on the Greenville development and the land use rights granted to Garden Cities by the City of Cape Town in connection with the component phases of the Greenville development in particular, is materially deficient.
2. The Garden Cities Greenville development will contribute over 5000 government subsidised (RDP/BNG) houses. As such the Garden Cities Greenville development is a significant contributing factor in addressing Cape Town's housing crisis and providing much needed housing stock.² The sustainability of Garden Cities' operations and its landholdings compromising the Greenville development are directly impacted by the CWA Project by, among others, long-term and irreversible aviation noise impacts.



3. Given the affordable housing crisis in the Cape Town Metropolitan Area and the housing opportunities provided by the Greenville development in all its phases, the proposed CWA Project will impact adversely not only on the sustainability of Garden Cities' operations but also on local communities' right to adequate housing and a healthy environment, which results in a long-term, irreversible "high negative" socio-economic impact of the proposed CWA Project on Garden Cities and its Greenville development.

¹ Paragraphs 26-35 of the Appellant's Comments on the Draft EIR dated 13 January 2025.

² <https://panafricanreview.com/cape-towns-housing-crisis-a-political-culture-of-apartheid-persists/>

³ Greenville Garden City's draft conceptual land use and phasing plan.

4. The BNG, GAP/FLISP and Group Housing projections and Hosuing Roll Out Plan in the Tables below contain the short-, medium- and long-term roll out of the Greenville Garden City development.

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

PHASE	DESCRIPTION	# of DWELLING UNITS	STATUS	TIMELINE	POPULATION
PHASE 1.1 sub phases A-G	BNG HOUSING	868	Completed	2015-2017	3906
PHASE 1.2 sub phases MNO, d	BNG HOUSING	507	Completed	2017-2019	2282
PHASE 2.1sub phases d, j, k, l, m,n ,o	BNG HOUSING	562	Under construction	2020-2021	2529
PHASE 2.2, sub phase a,b,c, q, l, n, æ	BNG HOUSING	745	Planning phase	2022-2024	3353
PHASE 2.3, aj, as	BNG HOUSING	697	Pipeline	2024-2026	3137
FUTURE PHASE 3.1	BNG HOUSING	566	Town planning subdivision	2026-2027	2547
FUTURE PHASE 3.2	BNG HOUSING	566	Town planning subdivision submitted for approval	2027-2028	2547
FUTURE PHASE 3.3	BNG HOUSING	567	Town planning subdivision submitted for approval	2028-2029	2552
FUTURE PHASE 3.4	BNG HOUSING	695	Town planning subdivision submitted for approval	2029-2030	3128
Total		5773			22628

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

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

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

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

5. The SIA identifies various factors which will contribute to the adverse impacts of the CWA Project on the sense of place for surrounding land users, which directly affects the housing and residential developments most directly impacted by the proposed CWA Project, with particular emphasis on those developments in direct proximity to the CWA such as Greenville.
6. Given the fact that the aviation noise impacts of the proposed CWA Project will be severe on the Garden Cities landholding this will effectively sterilise a large proportion of the Greenville development. For this reason, Garden Cities is one the key and most directly affected stakeholders. The socio-economic impacts of the proposed CWA Project on Garden Cities must therefore be adequately identified, evaluated and assessed as part of the environmental impact assessment process underpinning the competent authority's decision to grant the EA under

section 24 of NEMA. The Final EIAR, however, failed to assess the full socio-economic impacts on Garden Cities the Greenville development in all its phases, and, by implication, the EA was granted by the competent authority without due regard to all relevant considerations.

7. The obligation on the EAP in terms of NEMA is to investigate evaluate and assess the full range of potential impacts of the CWA Project on the receiving environment and most directly impacted receptors. This must include a comprehensive assessment the impact on Garden Cities' operations and the various phases of the Greenville development (particularly in light of the fact that the proposed airport is incompatible as a land use and competes with the Greenville development, as vast swathes of the Greenville development will be sterilised by the flight patterns, the flight paths and the significant noise impacts associated with the CWA Project). The Final EIAR for the proposed CWA fails to quantify these severe adverse socio-economic impacts and that implicates and undermine the sustainability of the Greenville development and Garden Cities' operations in general.
8. The full extent of direct, indirect and cumulative socio-economic impacts has not been quantified by the EAP and are not reported on in the Final EIAR, but they are nonetheless critically important considerations that are an essential prerequisite to the overall and defensible evaluation of the need for, and desirability of the proposed development required in terms of NEMA and the EIA Regulations. In the absence of such a comprehensive assessment of all attendant socio-economic impacts, not only is the assessment process deficient but the enquiry into Need and Desirability in terms of the EIA Regulations is materially flawed. In granting the EA, the competent authority made a decision that failed to consider all social and economic impacts of the CWA Project.
9. A legitimate concern was established at the earliest possible stage by Garden Cities during the public participation process that, in the case of the CWA Project, there has been a critical failure to investigate and assess all potential adverse socio-economic impacts, and to identify credible and sufficient measures to avoid those adverse socio-economic impacts. The point was made repeatedly during the EIA process that the impact of the CWA Project on the feasibility and/or sustainability of Garden Cities' operations and the various phases of the Greenville development had not been adequately assessed during the EIA process. It is evident from the Final EIAR submitted to the Competent authority that the comprehensive assessment of such impacts is still absent, and therefore a material deficiency and flaw in the assessment process carried through into the decision by the competent authority to grant the authorization for the project.
10. Potential socio-economic impacts were dealt with, but only superficially, in the Socio-economic Impact Assessment ("SIA") report, however, very limited effort or consideration has been given to thoroughly investigating and quantifying how the proposed CWA Project will impact the sustainability of Garden Cities' operations or infringe a number of socio-economic rights constitutionally provided to the present and future residents of the Greenville development. The right to housing in particular goes to the heart of the ultimate Constitutional imperative of fostering and furthering the socio-economic rights of the community through affordable

housing etc.⁴ As indicated, the full range of direct, indirect and cumulative impacts on the feasibility and/or sustainability of the Greenville development and the sustainability of Garden Cities' operations has simply not been adequately quantified or assessed or reported on in the Final EIAR.

11. In the *Government of the Republic of South Africa and Others v Grootboom and Others*⁵ the Court recognised that the constitutional right to adequate housing in a healthy environment and associated duties on the State in terms of providing housing, and that housing is essential to the realisation of the other socio-economic rights.⁶ The decision to grant the EA undermines the right to adequate housing in a healthy environment and the State's duties to providing housing. This is concern which carries constitutional implications.
12. In addition to the impact of the CWA Project on sense of place, research has shown that light pollution, especially that of artificial nature and night time light pollution in particular, will have a significant impact on human health, such as causing fatigue, increase anxiety, and even contribute to the development of certain cancers.⁷ Whilst the Visual Impact Assessment ("VIA") addresses some mitigating techniques to address the negative impacts of night lighting associated with the CWA Project, such as the use of "low level 'bollard' type lights" and "warm light sources",⁸ the report clearly warns that it is likely not possible for parts of the proposed CWA Project to adhere to the above mitigation measures which circumvents the impact mitigation hierarchy. Considering the potential for long-term, irreversible impacts on the Greenville development's residents, the long-term adverse visual impacts are a legitimate concern to surrounding land users and yet the EIA process has offered no meaningful nor concrete mitigation measures which would lessen or manage the impacts on the surrounding areas, who will be subjected to constant light pollution.
13. The Air Quality Impact Assessment Report for the proposed CWA Project inadequately assesses the impacts on the existing and future phases of the Greenville development, as well as other surrounding areas, failing to consider the cumulative impacts, by also not recognising Greenville as a sensitive receptor. The Air Quality Impact Assessment Report fails to evaluate mitigation measures effectively, and address key stakeholder concerns, ultimately rendering the report inadequate and unreliable in demonstrating that the CWA Project can be developed without causing significant and unacceptable air quality impacts on the residents of the Greenville development.
14. Based on the omissions and gaps in information in the Final EIAR for the CWA Project, there is no rational basis to conclude that the adverse socio-economic impacts have been appropriately investigated, evaluated or assessed, or that the mitigation measures proposed will be inviolable or a failsafe mechanism for protecting the viability of the Greenville development by avoiding

⁴ Sections 24, 26 and 27 of the Constitution of the Republic of South Africa, 1996.

⁵ (CCT11/00) [2000] ZACC 19.

⁶ *Government of the Republic of South Africa and Others v Grootboom and Others* (CCT11/00) [2000] ZACC 19; 2001 (1) SA 46; 2000 (11) BCLR 1169 paragraph 51.

⁷ Rajkhowa R, IJSR 2012 *Light Pollution and Impact of Light Pollution* 865.

⁸ VIA pg. 125.

and managing such impacts. There is simply not sufficient information in the EIA process to guarantee that anticipated impacts will *de facto* be avoided and/or mitigated. In the absence of relevant information, or credible studies, the competent authority should have adopted a risk averse and cautious approach and invoked the precautionary principle in section 2 of NEMA by refusing to grant authorisation in terms of section 24 of NEMA.

15. Independent specialist assessments of the impact on all relevant environmental, social and economic considerations were a necessity as part of the EIA process but the requisite level of credible and accurate impact assessment in relation to all material project related impacts was not undertaken, and where it was undertaken the impact assessment is flawed, deficient in several material respects and not credible. It goes without saying that the absence of comprehensive and accurate assessment of the full range of potential impacts on Garden Cities' operations and the Greenville development in particular is a fundamental flaw in the EIA process. The reasons for this submission include the following:
 - 15.1. Economic considerations are a crucial part of sustainable development. Considering the concerns raised by I&APs regarding adverse economic impacts, a full socio-economic impact assessment focusing particularly on potential economic impacts on other developments in the receiving environment should have been conducted during the EIA process.
 - 15.2. Given the role of the short-, medium-, and long-term provision of government subsidised (RDP/BNG) houses in the Greenville development in alleviating Cape Town's housing crisis, a full assessment regarding the potential impacts of the CWA Project on the feasibility and/or sustainability of other development in the receiving environment should have been undertaken.
 - 15.3. The socio-economic impacts of the CWA Project on the surrounding land uses have not been properly assessed. This means that a key factor and consideration informing the impact assessment process and related need and desirability analysis is absent. By implication the Decision-making process in terms of section 24 of NEMA is similarly tainted and fatally flawed
 - 15.4. The EIA process and the Final EIAR has failed to evaluate, consider and assess (and therefore mitigate) the single most significant potential impact of the CWA Project, namely the impact of the CWA Project on the viability and sustainability of surrounding enterprises and operations such as those of Garden Cities and the Greenville development.
 - 15.5. The failure to incorporate economic considerations and factors in any detail into the Final EIAR not only prejudices Garden Cities and a range of other I&APs but also means that it is not possible for anyone, especially the competent authority Exercising its administrative discretion in terms of section 24 of NEMA, to make an informed assessment of the full range of project related impacts which is a critical prerequisite to the competent authority being able to determine whether the CWA Project will satisfy the principle of sustainable development encoded in Section 2 of NEMA. The competent authority thus based its decision on materially deficient and inaccurate information, which underrepresent the true nature, extent and severity of project related impacts. The realpolitik aspect of this material omission in the EIA

process is that it resulted in concerns raised by I&APs regarding potential highly significant negative impacts on being disregarded, or at best, downplayed. As a result of the deficiencies in the Final EIAR the competent authority was unable to and did not, take into account, highly relevant socio-economic factors in relation to the CWA Project as is required in terms of NEMA.

- 15.6. Notwithstanding the material omissions and deficiencies identified by I&APs in comments during the public participation process, the scope of the assessment throughout the EIA process has remained largely unchanged, particularly with regard to the assessment of potential socio- economic and noise impacts on Garden Cities (and in particular the feasibility of the future phases of the Greenville development). The fact that the assessments Did not change materially throughout the EIA process results in the inference being drawn that all key and material project related impacts were either assessed superficially or not assessed at all.
- 15.7. In light of the deficiencies identified by I&APs throughout the EIA process, the precautionary principle finds application in this instance, but the principle has been completely ignored by both the EAP and the competent authority. This is further evidence of a critical shortcoming in the EIA process which culminated in the decision by the competent authority to grant authorization in terms of section 24 of NEMA.
16. The CWA Project was therefore approved by DEADP notwithstanding various substantive concerns regarding material impacts being raised throughout the process by I&APs. In particular, Garden Cities had identified flaws and omissions regarding the assessment of socio-economic impacts of the CWA Project, namely the failure to assess and quantify the full range of potential impacts on key stakeholders such as the residents of the Greenville development.
17. The failure to assess social and economic impacts on adjacent housing and the Greenville Development is a fatal flaw. In support of this we submit the following:
 - 17.1. The MEC as decision-maker on appeal is under a legal duty to take into account all material considerations relevant to the determination of the appeal against the decision to grant the EA for the CWA Project.
 - 17.2. The social and economic consequences and impacts of the proposed development on residential properties in close proximity to the CWA site are plainly material. They bear directly upon issues of sense of place, well-being, residential amenity, housing affordability, community stability, local services, and the overall social sustainability of the scheme. A failure to assess and/or consider a material consideration such as the social and economic consequences and impacts of the proposed CWA development constitutes an error of law. In addition the absence of any credible and comprehensive assessment of social and economic effects amounts to a failure by the EAP to comply with the EIA Regulations by compiling a lawful evidential basis for the decision required to be taken by DEADP as the competent authority under section 24 of NEMA.
 - 17.3. Established principles of administrative law require that DEADP as the competent authority and decision-maker must not act irrationally or on the basis of inadequate enquiry. Where

significant adverse effects are foreseeable, and substantive concerns raised during the EIA process regarding the efficacy and accuracy of the EIA process, the authority is obliged to obtain sufficient information from the Applicant to enable an informed judgment and decision in terms of section 24 of NEMA. The omission to investigate foreseeable impacts on nearby housing development projects in close proximity to the CWA Project renders the decision to grant the EA irrational.

- 17.4. Proximity of existing housing development projects to the proposed CWA Project intensifies the nature of the concern. As indicated, the Garden Cities Greenville development stands to be severely impacted by the CWA Project. It is self-evident that closer the proposed development sits to established residential areas, the more direct and substantial the likely consequences. Such impacts are neither remote nor speculative. They are inherent and predictable. In these circumstances, the failure by the EAP to investigate the full range of direct and substantial likely consequences constitutes not merely an inadequate assessment but a fundamental failure to ask the right question altogether, thus amounting to a reviewable error.
18. Presenting benefits without adequately evaluating costs violates the requirement for impartial, sustainability-centred assessment NEMA requires that EIAs address the long-term costs and benefits of development. The Final EIAR:
 - 18.1. Focuses heavily on speculative benefits while ignoring the costs of increased noise, loss of sense of place and community impacts.
 - 18.2. Uses promotional language inconsistent with objective environmental assessment.
 - 18.3. The omission undermines compliance with statutory and policy-based imperative to give effect to sustainable development. Under the relevant legal framework (including the applicable national sustainable development policy considerations), decision-makers must assess the social, environmental, and economic dimensions of development in an integrated manner. An EIA process that negates or bypasses the need for a thorough sustainability assessment effectively neglects social and economic impacts on neighbouring housing developments cannot lawfully be said to balance the three limbs of sustainable development. It is argued therefore that the EIA process – as a result of these material omissions – is structurally defective.
 - 18.4. The failing also vitiates the lawfulness of public participation and consultation. Meaningful consultation requires that affected residents are provided with adequate information to understand the implications of the proposal. Where the authority has not undertaken the necessary assessment, consultees are deprived of the opportunity to comment meaningfully. This constitutes procedural unfairness and gives rise to a freestanding ground of challenge.
 - 18.5. The authority cannot lawfully impose or secure mitigation without a proper evidential basis. Planning conditions and planning obligations must be justified, necessary, and proportionate. Without an assessment of social and economic impacts, the authority has no lawful basis upon which to determine mitigation, to evaluate the need for planning obligations, or to ensure

compliance with statutory tests. Any decision taken in such evidential vacuum is unsustainable.

- 18.6. The cumulative effect is a decision that is fatally flawed. The failure to investigate social and economic impacts on proximate housing constitutes a failure to consider material considerations; results in a decision made in the absence of necessary information; produces an irrational and unsustainable outcome; and denies affected parties a fair opportunity to participate. Each of these defects is sufficient individually to render a decision unlawful. Taken together, they demonstrate a fundamental failure in the decision-making process. Any resulting permission would therefore be liable to be quashed upon judicial review.

19. In summary, this ground of appeal illustrates:

- 19.1. The omissions and flaws in respect of the assessment of social and economic impacts identified by I&APs during the EIA process were not resolved by the EAP or the specialist studies tabled with DEADP in the Final EAIR.
- 19.2. I&AP concerns were responded to superficially by the EAP through the Comments and Response Table only with no tangible, credible or meaningful attempt to quantify the full range of social and economic impacts or to integrate the concerns raised by stakeholders into the assessment process by undertaking and ensuring a rigorous and credible impact assessment. The proposed CWA Project will have significant and material adverse socio-economic impacts on Garden Cities and in particular the Greenville development in all its component phases. This concern is exacerbated by the fact that the nature, extent and severity of such impacts has not been quantified or assessed in the manner required by NEMA and the EIA Regulations.
- 19.3. The fact that I&AP concerns were responded to superficially only by the EAP through the Comments and Response Table undermines the accountability and transparency of the public participation process in terms of the EIA Regulations. Public participation is arguably one of the most critically important aspects of the EIA process as it is aimed at harnessing local information regarding environmental aspects and impacts of a project and at fostering citizen participation in environmental decision-making under NEMA.
- 19.4. Regrettably the public participation process has, in these circumstances, failed to attain the key imperative to strengthen accountability from public functionaries. The DEADP approval in face of key I&AP concerns regarding the full range of social and economic impacts is legally indefensible. The EA undermines the accountability and transparency of the EIA process because key concerns about socio-economic impacts were dismissed or ignored without further interrogation by way of specialist assessment. In addition, cumulative socio-economic impacts are simply not identified, evaluated or assessed at all. What is required by NEMA, and the EIA Regulations is an assessment of the cumulative social and economic impacts of the CWA Project on the receiving environment and key receptors.
- 19.5. The Constitutional environmental right and the section 2 NEMA Principles contemplate that all relevant impacts identified must be assessed and that environmental decisions must

achieve a balance between environmental and socio-economic developmental considerations through the concept of sustainable development.⁹ It is not possible to ensure that sustainable development is achievable in the face of identified potential economic impacts that have not been assessed in terms of the EIA process. In the circumstances, DEADP should have called for additional studies to be undertaken so that all relevant factors – namely environmental, social and economic factors – can be appropriately balanced in accordance with the principle of sustainable development.

20. We reiterate that Garden Cities employs a significant number of people and adds a great deal of value to the local economy. Garden Cities' Greenville development in particular stands to be directly and materially adversely affected by the CWA. Despite this the critically relevant issue – that of economic impact with attendant long-term environmental and social consequences – has not been quantified.
21. A critical objective of the EIA process is to identify and predict the actual or potential impact on socio-economic conditions, including the impact of the proposed development on the feasibility and/or sustainability of other developments in the receiving environment. The Fuel Retailers case held that such impacts form an essential and legitimate component of the assessment, and such considerations are required by law to be carefully assessed during the EIA process.
22. In the circumstances, in light of the fact that the impact of the CWA Project on current and future component phases of the Greenville development has not been determined through a robust, credible scientific methodology and assessment which quantifies the full nature and extent of impacts on Garden Cities and its Greenville development in particular, a rational, reasonable and defensible decision by the competent authority was not possible. The EA should be set aside and the application refused on this basis alone.

Ground of appeal 2: Noise Impact Assessment

5. The CRR and Final EIAR fail to demonstrate that the noise impact assessment (NIA) is legally compliant. The technocentric approach and methodology to the evaluation of noise impacts and associated applicable noise rating levels ignores the fundamental significant impacts on Garden Cities and Greenville development. As a result of these impacts, the proposed new airport would still undermine sustainable development and create significant adverse noise impacts the undermine the socio-economic and environmental rights of Greenville residents. A legally compliant noise impact assessment is one that prevents significant adverse impacts and safeguards sustainable development.
6. The crux of this appeal ground is that the Final EIAR for the proposed project significantly underestimates the noise impacts on the Greenville development, relying on inaccurate noise assessments, proposing insufficient mitigation measures, and misrepresenting the existing

⁹ *Fuel Retailers Association of Southern Africa v Director-General: Environmental Management, Department of Agriculture, Conservation and Environment, Mpumalanga Province and Others* (CCT67/06) [2007] ZACC 13 at paragraph 61.

status of Greenville's ongoing and active residential development, ultimately demonstrating that the proposed CWA project, as currently proposed, is incompatible with socio-economic development and poses a serious threat to the well-being of residents.

7. In South Africa, the national standard SANS 10103:2008 sets "rating levels" for various district types, and guidance suggests that night sound levels should be ~5-10 dB(A) lower than daytime levels. For example, some generic SA guidance lists 45 dB(A) for night time in residential areas as a threshold. On the contrary, ideal health-based night noise levels are around or below ~ 40 dB(A) (outside bedroom) per the World Health Organisation, with higher values (but still modest) in some national guidelines. The City of Cape Town / Western Cape noise-regulations refer to SANS 10103 rating levels for districts. For instance, the mapping around airports uses "district guideline LRdn" levels (day-night average) as in modelling done for the proposed Cape Winelands Airport. One modelling study around Cape Town found that, in a worst-case scenario for a new runway area, portions of the community might experience day-night sound levels (LRdn) of ~ 49 dB(A) (just above 45) in certain zones. The Western Cape Noise Control Regulations allow a "disturbing noise" if it exceeds the rating level by certain amounts, but do not by themselves set a single fixed "night aviation noise limit".
8. The Final EIAR understates the unique impact of aircraft noise. Annoying or disturbing aircraft noise is one of the clearest examples of where regulatory standards fail to reflect the "lived experience" of human interaction with what is considered to be annoying noise. There are several proven aircraft noise studies that demonstrate that aircraft noise is particularly problematic and further demonstrate why the applicable standards and regulations might technically underrepresent how people actually experience and react to the noise.
9. The human health and well-being of residents in the Garden Cities' Greenville development stand to bear the brunt of the impacts by aircraft noise and annoyance. The human health and well-being of residents is closely tied to noise impacts and sleep disturbance. The unique impact of aircraft noise stems from the fact that aircraft noise is highly intermittent, not continuous and comes in distinct peaks associated with take offs, landings, and flyovers. Even if the average noise level (LAeq) is low according the Final EIAR and NIA, the peaks are very high, sometimes 20–35 dB above background noise. Regulations based on long-term averages (Lden, LAeq) dilute those peaks over hours or entire days, making the noise look less harmful than people experience it. Peaks interrupt sleep, concentration, and relaxation which are inexorably linked to human health and well-being impacts. Even modest exceedance (e.g., 45-50 dB) can have health impacts at night (sleep, stress).
10. The applicable regulatory and policy guidelines or standards employed in the NIA ignore and/or underrepresent the true nature of the noise impacts associated with an airport of the approved scale as experienced by humans and, more specifically, the residents of Greenville. Legal standards tend to be compromises, not health benchmarks. Aircraft noise standards don't reflect real annoyance for the following reasons, which factors were not identified, evaluated or assessed as part of the Final EIAR:

- 10.1. The temporal dynamic in terms of which aircraft noise has high rise times (sharp jumps in volume), which are neurologically more disturbing than steady noise.
- 10.2. Tonality and low-frequency components travel far because aircraft engines generate: Low-frequency rumble that penetrates walls and windows; tonality (distinct whine).
- 10.3. Low-frequency noise is harder to insulate against and is more strongly associated with chronic annoyance, but regulatory metrics do not weight these frequencies properly.
- 10.4. The exclusive reliance in the NIA on regulatory metrics average out the way humans react to each aircraft event, not the daily average.
- 10.5. Human annoyance at aircraft noise depends on number of events, not just loudness. Studies show that 30 loud events can be more annoying than 100 quiet ones. Frequency and timing matter more than average energy. Aircraft noise exposure (e.g., 65 dB Lmax) can happen dozens of times per hour near busy airports, leading to persistent stress despite acceptable “average” levels.
- 10.6. Non-acoustic factors are powerful influencing factors which are not accounted for credibly in the NIA. In particular, the NIA ignores the fact that aircraft noise annoyance is amplified by unfairness and perceived unfairness (airport benefits vs. community burdens). Lack of control (cannot shut windows in summer, etc.).
- 10.7. Allowable limits in terms of the applicable Regulations and Standards are higher than health-optimal levels recommended by WHO guidelines. The WHO Guidelines are much stricter but not always enforced. The WHO Environmental Noise Guidelines (2018) recommend Lden < 45 dB and Lnight < 40 dB. The hard-edge reality is that many airports operate well above this and there is very little of substance in the mitigation measures identified to avoid this inevitable impact.
- 10.8. Modern flight path concentration increases localised annoyance. The reason for this being that GPS-based navigation (RNAV), flight paths have become narrower. These concentrates noise over smaller geographic areas, in this instance the outskirts of residential areas in Cape Town.
- 10.9. Peak Noise (LAmax) and frequency of high-amplitude events give rise to harms are not reflected in aggregate noise contours. Impacted communities may experience dozens—or hundreds—of noisy overflights per day, each producing the following impacts Reduced outdoor amenity Elevated stress responses.
11. The regulatory metrics used in the NIA average away or mask the true nature of the experienced impacts as the worst noise use a combination of LAeq (equivalent continuous level) and Lden (day-evening-night, with evening/night penalties). The over reliance on these technical metrics in the NIA obscures and underrepresents the true nature of the impact on human well-being and the subjective real-life experience of the reasonable person or ‘resident’ in the receiving

environment, such as those in the Greenville development. They do so by penalising night noise lightly (a 10 dB penalty is inadequate), and the metrics treat one loud aircraft the same as many softer ones and for this reason the metrics used in the NIA mask or hide the true “event-based” nature of aircraft noise.

12. The NIA may purport to demonstrate that total noise may be unchanged, but fewer people get far worse exposure, producing intense localized annoyance that the metrics don’t capture or reflect accurately. In short, aircraft noise annoyance is underrepresented in the approach and methodology employed with regard to the Regulations. Add to that the complexity of human annoyance, political pressures, and limitations of standard metrics, and the result is standards that do not reflect lived experience. Aviation noise has particular characteristics (finite events, high peak levels) which may cause sleep disturbance at lower average levels than simpler continuous noise sources. Thus, even if the averaged night-time level seems “within guideline”, the actual human health and well-being impacts may still be significant.
13. With regard to impacts on human health and wellbeing even a small number of nighttime flights can cause severe health issues and symptoms including sleep fragmentation, long-term cardiovascular stress. The City’s “What is Noise?” educational material lists that noise interferes with sleep and health and notes that “Loss of sleep ... is a critical component of noise-related annoyance.” There is no credible evidence tabled in the Final EIAR of the cumulative night-time aviation noise impact in the Cape Town International Airport (CTIA) / greater Cape Town area and how this cumulative impact compares with public-health noise recommendations.
14. The result of the deficiencies in the NIA and Final EIAR create a mistrust in the ability and commitment of the Developer and the authorities to control and regulate noise impacts particularly when the proposed new airport will clash with the surrounding land uses. There is also a deep-seated concern about the inevitability of incremental changes over time to new flight paths and increased air traffic. The full spectrum of impacts have not been accounted for through the bare minimum approach to compliance with the applicable Regulations which cannot encode these psychological and social drivers.
15. NIAs typically aim to demonstrate formula compliance with regulatory thresholds, not to guarantee the absence of community or environmental harm. The mere fact that the NIA may establish legal compliance with standards and regulations at best sets a minimum standard. The mere fact that the NIA has been undertaken in accordance with is not an assurance of no harm. Even when an NIA meets all statutory requirements the following concerns still prevail:
 - 15.1. Thresholds often reflect political compromise, not scientific consensus on health effects.
 - 15.2. Permitted daytime and nighttime noise levels are higher than the levels at which WHO, public health bodies, and academic research show adverse effects.
 - 15.3. NIAs rely on modelled averages (e.g., LAeq), which under-represent the disruptive nature of intermittent high-intensity noise events such as aircraft overflights.

16. Thus, “legal compliance” does not mean “no significant adverse impact”—it merely means “meets the minimum standard required to obtain permission.”

Noise metrics used in NIAs can mask real-world harm

17. The NIA indicates that sound measurements of the continuous A-weighted equivalent sound pressure level (LAeq) at the five selected positions were performed, following the SANS 10103:2008 guidelines. As argued above, the standard NIA metrics (LAeq, 57 dB LOAEL contours, etc.) do not fully account for context of the receiving environment and aircraft noise which causes disproportionate disturbance compared with other noise sources due to sudden onset, high peak levels and Low-frequency components that travel long distances. In fact, using averaged metrics misrepresents the qualitative nature of the impacts because it smooths out high-amplitude events and hides the experienced annoyance and sleep disruption.

Aviation night noise levels will exceed public-health recommendations

18. There is reason to believe some night-time aviation noise exposures in Cape Town exceed the ideal health-based targets (like WHO’s ~ 40 dB(A) at night). If modelling indicates residents near flight paths may receive ~ 49 dB(A) (or higher) at night (or averaged day-night), that exceeds the ideal WHO target of ~ 40 dB(A). Whereas the regulatory guideline may permit higher levels (e.g., 45 dB(A) or more) before action triggers. So, while compliance with local regulation may be achieved, local regulation may be less stringent than the optimal health-based target.
19. In some communities around Cape Town, aviation night noise levels already exceed the best public-health recommendations (WHO’s ~ 40 dB(A) Lnight) — though they may still comply with local regulatory or planning guidance (e.g., SANS district levels, City-mapping). This illustrates:
 - 19.1. Specific numbers for aircraft operations (take-offs/landings at night) in Cape Town require monitoring data which may not be publicly summarised for all communities.
 - 19.2. Mitigation (insulation, flight path design, night-restrictions) may help reduce actual exposure matters more than just average guideline levels.

Underestimation of impacts by using optimistic assumptions

20. Legally compliant NIAs, such as that informing the Final EIAR, often rely on assumptions that minimise apparent noise exposure:
 - 20.1. Forecast air traffic may be lower than actual future demand, leading to underestimation.
 - 20.2. Fleet mix assumptions (e.g., “quieter” next-generation aircraft) are often optimistic.
 - 20.3. Weather and runway use assumptions may not reflect worst-case conditions.
 - 20.4. Baseline conditions may be taken at quieter periods, reducing predicted relative increases.
21. Thus, even legally sound assessments produce systematically conservative (understated) results.

Noise impacts are incompatible with key dimensions of sustainable development

22. Sustainable development requires balancing economic viability, environmental protection and social well-being. The new CWA airport is a large-scale infrastructure intervention which directly undermines environmental protections and human well-being by inducing large, permanent, and expanding noise footprints.
23. Aircraft noise has well-evidenced links to public health impacts such as cardiovascular disease, hypertension, learning impairment in children, elevated stress and anxiety and reduced sleep quality. These long-term health impacts of the project place a significant and disproportionate burdens on local communities contradict sustainable development principles regarding quality of life and well-being.
24. Sustainable development explicitly requires equitable distribution of burdens and benefits. The impact places a disproportionate burden on local communities because the noise exposure is not evenly distributed. The proposed new airport directly implicates the Greenville development as it places the heaviest impacts on a limited number of communities. It also reduces property values in specific localities such as the Greenville Development.
25. Sustainable development requires futureproofing, particularly in the context of increasing global concerns regarding the devastating impacts of climate change and those activities that directly contribute to escalating the potential harm associated with climate change. From a noise perspective hmm airport noise exposure locks in permanent and escalating harm. This flies in the face of the precautionary principle

Noise Impacts are long-term, irreversible, and likely to worsen over time

26. An inevitable aspect regarding the long-term incompatibility of land uses in the long term is that airports tend to expand; operations intensify; and communities grow around infrastructure. Therefore, noise contours almost always grow rather than shrink. The traditional motivations used to obtain environmental and planning approvals is based on “quiet aircraft” improvements and technology. Any such improvements are offset by increased flight frequency. Once an airport is built, noise-exposed communities have no practical recourse.

Monitoring

27. Post-authorisation noise monitoring is often used at new airports to check whether predicted noise levels match real-world outcomes. However, it is an inadequate tool for applying the impact-mitigation hierarchy. Monitoring happens after impacts occur.
- 27.1. The mitigation hierarchy prioritises avoiding impacts before they happen, whereas post-authorisation monitoring only measures noise after the airport is already operating, which means in turn that (1) affected communities may already be exposed to significant disturbance; (2) avoidance and minimisation opportunities (e.g., runway location, flight paths,

operational restrictions) are no longer realistically available; and (3) it turns noise into a compliance exercise rather than a planning-stage mitigation process.

- 27.2. Even when monitoring identifies noise problems often the impact already occurs before any corrective action is possible, contradicting the hierarchy's preventative intent, and defeating the principal object of the EIA process. Monitoring as a type of post-authorisation mechanism lacks strong, enforceable consequences. The relevance of monitoring in the post-authorisation stage is also illustrated by likely future adjustments to the CWA Project including for example effective mitigation through the re-routing aircraft, and further restricting night flights may be politically or operationally difficult once the airport is functioning.
28. An inherent flaw in monitoring as an effective mitigation strategy is that there may be long delays between detection, analysis, and any intervention. Thus, monitoring provides information, not meaningful mitigation. Furthermore, monitoring typically uses metrics such as LAeq or Lden, which can, as argued in this Appeal, mask peak noise events which directly affected communities often find most disruptive. As a result, real-world impacts on human health and well-being may be underestimated, reducing the ability to deliver targeted mitigation identified in the Final EIAR.
29. Noise monitoring does not address distributional and equity issue because it is aggregated across zones rather than identifying vulnerable groups (such as schools, places of worship, hospitals, low-income areas). This highlights the disproportionate burdens on specific communities and raises concerns about environmental justice and creating new noise nuisance "hotspots" – where none previously existed - created by actual flight behaviour.
30. Monitoring programmes are often limited in scope and duration because they have limited scope of operation (duration) or use sparse monitoring stations that miss localised effects (inadequately spatialised monitoring zones). This makes it incomplete and biased, undermining its value for mitigation.
31. The mitigation hierarchy requires avoiding harm to sensitive receptors, which monitoring alone cannot ensure. Even if modelling assumptions are optimistic based on predictions regarding aircraft fleet mix, operational procedures, or weather patterns the fact remains that monitoring can only reveal the error; it cannot correct for flawed modelling. Thus, post-authorisation monitoring is reactive, not proactive and is meaningless in the sense of it is not capable of adhering to or implement the mitigation hierarchy. Where monitoring indicates or confirms an "overshoot" in predicted impacts this leaves little room for true effective mitigation.

The impact on human health and well-being and "quality-of-life" effects are underrepresented

32. Noise nuisance and annoyance is dismissed in the EIA process as an automatic and inevitable consequence of the Project, yet this impact is recognised by health authorities globally as a legitimate health outcome, associated with the proposed airport's inevitable impact on reduced outdoor recreation or to enjoy gardens or public spaces; and results in higher stress hormone levels.

33. These everyday disruptions associated with the CWA Project directly undermine environmental quality and social well-being, which are core to sustainable development, and, whilst the NIA may be legally compliant, it does not address or enable a broader sustainability evaluation because it does not require exploration of alternative sites, minimisation of flight numbers, and consideration of alternative transport modes. In short, the project may comply with noise regulations, but it fails the wider sustainability test because less harmful alternatives exist but are not required to be considered.
34. In terms of the adequacy of mitigation in this context, we submit the following:
 - 34.1. Insulation programmes protect indoor environments but do nothing for outdoor exposure, open windows, and the broader community experience of noise.
 - 34.2. Flightpath and runway-use changes may shift noise burdens rather than reduce them, simply moving over flights from one community to another.
 - 34.3. Effective mitigation is undermined by a lack of transparency regarding flight-path options and for relying on baseline data that under-states future impacts.
 - 34.4. “Quieter aircraft” technology, though helpful, is incremental and often negated by increases in flight movements associated with the inevitable expansion of the CWA Project in the future.
35. The 2015 review “Aircraft noise effects on health” by Dr Charlotte Clark (for the Airports Commission) states that over the past decade, evidence that aircraft noise exposure leads to increased risk for poorer cardiovascular health has increased considerably. A 10 dB increase in aircraft or road traffic noise was associated with a 7-17 % increase in risk of cardiovascular outcomes. That review references the HYENA study: 4,861 people around 7 European airports (including Heathrow) found that a 10 dB increase in night-time aircraft noise was associated with a 14 % increased odds of hypertension. Further, the NIHR-commissioned “Impact of short-term aircraft noise on cardiovascular disease risk in the area surrounding London Heathrow airport” – RISTANCO study – found a positive link between avoidable death rate and daily aircraft noise exposure, particularly at night. A 2023 study in ScienceDirect “Aircraft noise and cardiovascular morbidity and mortality” found associations between aircraft noise and increased incidence of cardiovascular disease.
36. The evidence for children: aircraft noise exposure at school is associated with impairments in reading, memory and attention. The 2015 review reports that children aged 9-11 around Heathrow, Schiphol and Madrid airports showed increased annoyance at higher noise levels; and a 10 dB increase at school was associated with ~0.13 increase in hyperactivity symptoms. Though the clinical significance of hyperactivity is small, the cognitive/learning effects remain.
37. Many of the areas under new or increased flightpaths are already socially deprived, and noise sensitive populations (children, elderly, those with existing health issues) will bear more of the burden. This is directly relevant to the Greenville development which offers low-income housing

to vulnerable groups of people. From a noise perspective alone — leaving aside air-pollution, climate, surface-transport and other environmental issues —the extra burden is disproportionate, risks deeper social inequities and may violate public-health and liveability commitments. Unless decision-makers adopt the highest health-based standards, provide full transparency and ensure communities are not simply asked to bear the cost of airport-growth, the case for expansion is weak

38. Over emphasis on technocratic nature of EIA means Noise Impact Assessment can be fully compliant and still fail to capture peak noise disturbance or represent true human health and community effects. Therefore, even a legally compliant NIA does not prevent a proposed new airport from creating significant adverse noise impacts and undermining sustainable development. It directly implicates addressing equity, environmental sustainability, and long-term social well-being.
39. Overall the noise assessment is materially deficient, making the noise assessment materially incomplete and unreliable and the Final EIAR fatally flawed. The NIA is based on incorrect and inconsistent baseline assumptions. Noise should be evaluated in detail because it is the most significant concern for local communities. Key concerns include:
 - 39.1. Noise assessment is incomplete, unclear and unreliable, with incorrect baseline assumptions and inconsistent data.
 - 39.2. Baseline (Scenario 1) is not based on actual current conditions, inflating baseline noise and distorting comparisons with future scenarios.
 - 39.3. Noise contours show significant expansion of high-noise areas (e.g., 55 dBA contours expanding from 2.5 km² to 10.3 km²), contradicting claims made in the Final EIAR.
 - 39.4. Key community questions—such as where speed reductions or approach noise will occur—could not be answered.
 - 39.5. Mitigation hierarchy is poorly applied. The responsibility and burden of impact is shifted to surrounding land uses instead of avoiding or minimising impacts.
 - 39.6. Noise mitigation details are postponed until after authorisation, undermining reliability of post-mitigation impact ratings.

Ground of appeal 3: Need and Desirability

40. The Final EIAR does not comply with the NEMA 2014 EIA Regulations as it fails to provide an objective, evidence-based assessment of the project's need and desirability. Claims regarding fuel savings, carbon reductions and socio-economic benefits are unsubstantiated, unsupported and not supported by evidence. As such, the EIAR does not present reliable information capable of informing lawful environmental decision-making.

41. References to alignment with SDGs 11, 12 and 13 are asserted without analytical support. The EIAR does not demonstrate how the proposed development substantively advances these goals, rendering the claims misleading and inconsistent with the NEMA principle requiring accurate, transparent and fact-based assessments (section 2(4)(g)).
42. Accordingly, the need-and-desirability assessment is materially deficient and does not meet the legal standard required to support environmental authorisation. Instead of complying with NEMA's requirement for an evidence-based evaluation, the need and desirability chapter in the EIAR reads like a marketing document, not an environmental assessment. This is shown due to the fact that it contains "excessively wordy/verbose" statements and marketing phraseology rather than factual analysis. This language is indicative of a pro-development bias. The implications of this are that the Final EIAR lacks the neutrality and independence required of an EAP by the EIA Regulations.
43. The claims made by the EAP in the EIAR are overstated, inaccurate, or not supported by evidence. During the public participation process, Garden Cities identified multiple examples where the need and desirability compiled by the EAP makes unsubstantiated or exaggerated claims about the benefits of the proposed CWA Project whilst masking or underestimating the potential negative effects. The arguments made by the EAP about economic or sustainability benefits are flawed and/or overstated, inaccurate or irrelevant. Claims of major fuel savings and CO₂ reductions are not backed by the cited studies. The implications of this are that the Final EIAR is based on a material misrepresentation of benefits of the project. This skewed methodology and assessment undermines the legal requirement for a fact-based need analysis in the EIA process.
44. The section fails to comply with NEMA EIA Regulation content requirements as it does. The chapter on need and desirability in the Final EIAR does not meet the formal regulatory expectations as it does not properly answer the foundational question of whether the development is appropriate in its environmental and spatial context. The implications of this are that the Final EIAR and the need and desirability enquiry does not satisfy mandatory EIA content standards prescribed by the EIA Regulations.
45. The need and desirability enquiry reported in the Final EIAR does not adequately consider the suitability of the site for the CWA Project. The airport's context—surrounding land uses, housing developments, existing and growing residential areas, and noise sensitivity associated with the existing predominant land uses—makes the desirability of the Project uncertain, yet the EIAR glosses over these constraints. The EAP in the Final EIAR fails to ask or answer, "whether this development is still appropriate for this place," which is the core purpose of the need and desirability test. Without appropriate and contextually relevant situational evaluation, the need and desirability enquiry in the Final EIAR is baseless.
46. The need and desirability enquiry in the Final EIAR is also rhetorical. Instead of weighing environmental, social, and policy factors and undertaking an objective and independent critical analysis of need and desirability, the EAP relies on broad and meaningless statements about unlocking markets, innovation and aviation competitiveness. The Final EIAR also includes

various generic sustainability narratives which are nothing more than window dressing And do not serve as a credible and scientifically proven basis for achieving the imperative of sustainable development in terms of section 2(4) of NEMA. The comments submitted by Garden Cities during the public participation process, clearly identified the concern that the conclusions reached by the EAP are not independent, credible or evidence-driven. The EAP's conclusions regarding need and desirability are disconnected from the actual environmental impacts foreseeable in connection with the CWA Project. The implications of this are that the Final EIAR fails to apply NEMA's sustainability threshold and the reasonableness test under administrative law.

47. The Final EIAR also selectively interprets policy to support the CWA project which is a further indication of pro-developer bias. The need and desirability analysis is selective and displays an exclusive preference for citing supporting policy language which translates into pro-developer bias. This bias is exacerbated by the omissions of key planning and environmental policies that contradict the so-called 'need' for the CWA Project. This selective approach is unbalanced and inconsistent with credible best practice EIA impact assessment, analysis and reasoning. NEMA and the EIA Regulations require clear evidence-based justification, grounded in environmental, socio-economic and spatial realities. This has not been achieved in the Final EIAR where the need and desirability section relies heavily on broad rhetorical statements such as "unlocking new markets" and "embedded sustainability". As indicated above, these statements are meaningless and are not supported by credible investigations and analysis. Such rhetoric cannot, on any version, be said to meet the legal standard for a reasoned, defensible need and desirability analysis doing an EIA process in terms of the EIA Regulations. This is as a substantive deficiency in the assessment underpinning the section 24 NEMA application for the CWA project.
48. The need and desirability assessment further fails to comply with the 2014 EIA Regulations. Regulation 21 specifically requires that the need and desirability section provide a balanced, evidence-based assessment of whether the proposed activity is appropriate in its environmental and socio-spatial context. However, it does not meet these formal requirements.
49. The need and desirability section in the Final EIAR also does not answer the central legal question whether the CWA development is appropriate for this place, given environmental sensitivities, surrounding land uses, and long-term spatial planning. The assessment fails to answer whether this CWA development is still appropriate for this place. This omission is material and renders the need and desirability assessment legally insufficient.
50. The need and desirability section is biased, promotional, and not objective. NEMA requires that environmental information be accurate, objective, and free from bias (NEMA s 2(4)(g)). However, this section is drafted using marketing language, not neutral environmental analysis. It contains excessively verbose narratives and cosmetic marketing phraseology all of which are indicative of a strong and persistent pro-development bias. The assessment in the Final EIAR is self-evidently tainted and does not satisfy the duty to present transparent, factual information to I&APs and the competent authority.

51. Key claims are also overstated, inaccurate or unsupported. Regulation 21 requires evidence-based justification. Instead, the need and desirability section includes numerous unsubstantiated and exaggerated claims, including on economic benefits and sustainability. The statements in the need and desirability chapter are flawed and/or overstated, inaccurate or irrelevant. Unsupported or incorrect statements cannot legally satisfy the requirement for a reasoned need analysis.
52. The enquiry selectively cites policy and omits contradictory planning considerations. A lawful need and desirability enquiry must demonstrate full and balanced alignment with relevant national, provincial, and municipal planning frameworks. However, the Final EIAR selectively interprets policies, excludes evidence of misalignment, and applies planning provisions “nebulously,” without clear substantiation. Selective policy use is inconsistent with NEMA’s requirement for credible and comprehensive environmental information. The enquiry improperly relies on rhetorical assertions rather than analysis.
53. The Final EIAR’s need and desirability assessment is also legally and substantively deficient, not only because it employs promotional and biased language, but it also misrepresents or overstates potential benefits, whilst also failing to address the fundamental question of site suitability and desirability. This skewed take on the need and desirability is exacerbated by the selective reference policy, relies on unsupported claims and does not comply with the 2014 EIA Regulations or NEMA’s requirements for transparent, objective and factual environmental information. As a result, the need and desirability assessment is fatally flawed, thus undermining the credibility and legal sufficiency of the Final EIAR as a basis for defensible and informed decision-making. The competent authority is in such circumstances effectively precluded from relying on this assessment as a basis for environmental authorisation.

Ground of appeal 4: Alternatives

54. The consideration of alternatives is wholly inadequate. Only variations of the same development proposal were examined during the EIA process. It does not provide a legally sufficient assessment of reasonable and feasible alternatives. The argument that no genuine alternatives were assessed, is evident from the fact that there is no attempt to investigate a scaled-down airport expansion; or alternative layouts; or alternative site footprints; or reduced runway lengths. The minor changes labelled as “Alternative 4” are minor modifications only and are not true alternatives intended to avoid impacts in terms of the impact mitigation hierarchy.
55. The “no-go” alternative was applied inconsistently, especially in the Noise Impact Assessment, creating a misleading assessment. This approach results in misleading comparative outcomes and does not meet the standard for a consistent and transparent alternatives analysis.
56. As a critical pre-requisite, the EIAR underpinning the EA must identify and assess feasible and reasonable alternatives, including location, layout, scale and technology. The main concerns raised in support of this appeal include the following:

- 56.1. Alternatives provided are merely minor technical variations (Alternatives 2, 3, 4) that do not reduce impacts.
- 56.2. There is no reduced-footprint or scaled-down alternatives provided.
- 56.3. There is no alternative site analysis supplied, even though the EIAR claims such alternatives were examined.
- 56.4. Some “alternatives” were introduced late to address errors, not to reduce environmental impacts.
- 57. This constitutes material non-compliance with the legal requirement to present feasible, impact-reducing alternatives. The EIAR’s treatment of alternatives constitutes material non-compliance with the statutory requirement to identify and evaluate feasible, impact-reducing options. By failing to present and assess meaningful alternatives, the EIAR undermines the decision-making process, deprives the competent authority of the necessary information to weigh impacts against benefits and renders the environmental authorisation legally indefensible. The omission of robust alternative analysis represents a fundamental procedural and substantive flaw in the environmental assessment

Ground of appeal 5: Policy and Planning Misalignment

- 58. Claims of alignment with national, provincial and local planning documents are selective, overstated or incorrect. This shows inconsistency and allows for proper decision-making to not be rendered proper.
- 59. The EIAR emphasises policies that support development while omitting those indicating misalignment. This lack of information allows for the aspect of transparency to be hindered.
- 60. The proposed project is not aligned with the desired future spatial development of the area. As a result, this shows inaccuracy and a lack of evaluation overall.

Ground of appeal 6: Non-compliance with NEMA principles

- 61. The Final EIAR demonstrates systemic failure to apply several core NEMA principles that are legally binding on environmental decision-making.
- 62. The Precautionary Principle has not been applied. Section 2(4)(a)(vii) of NEMA requires the precautionary principle to be applied where information is uncertain, inadequate or unreliable. Significant uncertainties remain regarding key impact drivers. These uncertainties are shown and not addressed through additional studies, conservative scenarios or avoidance measures.
- 63. The review shows that the Final EIAR repeatedly downplays uncertainty, particularly regarding noise, biodiversity and aviation growth projections. For example:

- 63.1. Noise data and scenarios contain major inconsistencies and uncertainties that are not resolved, yet the significance ratings remain unchanged.
 - 63.2. Biodiversity impacts remain uncertain, but no additional studies or avoidance measures are implemented.
64. NEMA requires that where information is uncertain, the environment must be protected proactively. The EIAR does not do this and is in violation of NEMA.

Ground of appeal 7: Poor Application of the Mitigation Hierarchy

65. NEMA requires mitigation to follow four steps: avoid → minimise → rehabilitate → offset. The Final EIAR fails at the first step. This is shown in the following ways:
- 65.1. Avoidance alternatives were never explored. There are no layout changes, scaling-down options, runway length alternatives or design permutations.
 - 65.2. The EIAR incorrectly requires surrounding land uses (e.g. residential developers) to adjust to airport noise. This inverts the mitigation hierarchy.
 - 65.3. Noise mitigation is deferred until after authorisation, meaning mitigation does not exist at the decision-making stage.
66. This violates the mandatory mitigation sequencing under NEMA and is inconsistent with environmental practice. This omission undermines the integrity and reliability of the impact assessment, renders the proposed mitigation measures uncertain and prevents the competent authority from making a legally defensible decision based on fully mitigated impacts. The assessment is therefore procedurally and substantively inadequate for the purposes of environmental authorisation.

Ground of appeal 8: Non-compliance with the EIA Regulations, 2014 as amended

67. The Final EIAR fails to comply with several specific regulatory requirements in the EIA Regulations.

Inadequate Description of the Affected Environment (Regulation 21©)

68. The EIAR must provide a clear, accurate and comprehensive description of baseline conditions. A misleading baseline renders the impact assessment non-compliant and undermines the integrity of the entire EIA process and the Final EIAR. This deficiency compromises the validity of impact assessments and misguides the evaluation of mitigation measures. However, the following indicates that the description of the affected environment and baseline conditions is inadequate:
- 68.1. Noise baseline (Scenario 1) is not the actual current condition but an inflated, theoretical full-capacity scenario, which misrepresents existing impacts.

- 68.2. Baseline maps are labelled “Current” despite representing fictional future flight paths, which the calls misinformation.
- 68.3. Conflicting aircraft movement numbers appear across reports, making baseline understanding impossible.

Inadequate Assessment of Impacts (*Regulation 21(e) & (h)*)

- 69. An impact assessment that lacks reliable data or excludes major impacts cannot meet regulatory standards. The EIAR must assess nature, significance, duration, extent, magnitude and mitigation of impacts. However, the following indicates otherwise:
 - 69.1. Noise — the most significant community and I&AP concern — is not assessed in the Socio-Economic Study as a standalone impact.
 - 69.2. Impacts on current on-site businesses are not assessed at all.
 - 69.3. Impact ratings rely on mitigation that does not yet exist (pending Noise Management Plan).
 - 69.4. Key impact assessments rely on incorrect, inconsistent, or incomplete data.

Inadequate Public Participation and Responses to Issues Raised (*Regulation 39–41*)

- 70. A cursory review of the Final EIAR indicates that I&AP questions were not adequately addressed:
 - 70.1. The answers were vague, generic or evasive, particularly regarding flight paths and noise. A detailed response should have been provided as this shows lack of attention.
 - 70.2. Key questions (e.g. speed reduction locations) received non-answers, indicating insufficient information for meaningful engagement.
- 71. Failure to answer relevant and reasonable concerns constitutes non-compliance with the public participation requirements. This goes against section 33 of the Constitution of South Africa in terms of the right to fair administrative justice.

Ground of appeal 9: Non-compliance with spatial planning and land use management legislation

- 72. The EIA Regulations require proof of planning alignment. There is an objective failure to demonstrate this undermines the lawful basis for authorisation. The EIAR selectively cites policies and claims alignment with spatial plans without sufficient evidence. This is evidenced by:
 - 72.1. Policies are applied nebulously or without meaningful analysis, according to the review.
 - 72.2. The EIAR does not answer the critical planning question: Is this project aligned with the desired long-term spatial character of the area? The review notes for this question is not adequately addressed. It is vague and does not provide clear feedback.

Ground of appeal 10: Misrepresentation of International Policy – SDGs

73. The Final EIAR asserts alignment with Sustainable Development Goals (SDGs) 11, 12, and 13. Upon review, these claims are demonstrably misrepresented and inaccurately applied.
74. SDG 11 (Sustainable Cities and Communities) is incorrectly invoked, as the proposed airport expansion does not demonstrably address housing provision, inclusive urban planning, or enhancements to the transport system.
75. SDG 12 (Responsible Consumption and Production) and SDG 13 (Climate Action) are similarly misrepresented, with projected increases in aviation emissions not accounted for, thereby undermining the claimed environmental benefits.
76. While SDGs are not legally binding, presenting them as objectives achieved or addressed, contrary to the factual evidence, constitutes misleading information. This misrepresentation is inconsistent with section 2(4)(g) of NEMA, which requires that environmental assessments be conducted with transparency and factual accuracy. Such inaccuracies compromise the integrity of the EIA and the lawful basis for environmental authorisation.

Ground of appeal 11: Misuse and misrepresentation of specialist studies and expert input

77. The EIAR presents expert studies in ways that are inconsistent with their findings. Examples:
 - 77.1. The PACE report is cited as indicating cumulative CO₂ savings of 56 million kg, despite the report providing only indicative savings of 3–5%, without any cumulative quantification.
 - 77.2. Aircraft types referenced in the EIAR examples, such as the A350, are not included in the original fuel study, resulting in misleading extrapolations.
 - 77.3. Discrepancies between projected aviation growth and noise scenario assumptions are neither reconciled nor justified, further compromising the reliability of the impact assessment.
78. Accurate and faithful representation of specialist inputs is essential to the integrity of an EIA. The mischaracterisation and selective use of expert information in the Final EIAR constitutes a material procedural flaw, undermining the reliability of the assessment.

CONCLUSION

79. Based on the identified non-compliances, the appeal concludes that the Final EIAR is legally insufficient for the following reasons:
 - 79.1. Materially and procedurally flawed;
 - 79.2. Not compliant with the NEMA principles;
 - 79.3. Not compliant with the 2014 EIA Regulations;
 - 79.4. Not aligned with the applicable planning frameworks;
 - 79.5. Not based on accurate or reliable information;
 - 79.6. Not suitable for informed environmental decision-making; and
 - 79.7. In its current form, the Final EIAR is “fatally flawed” and cannot support authorisation.

80. The Final EIAR exhibits multiple material deficiencies, including incomplete information, factual inaccuracies, methodological flaws and demonstrable bias. Collectively, these shortcomings result in an assessment that is neither scientifically rigorous nor sufficiently reliable to support informed environmental decision-making. The EIAR fails to fulfil the statutory purpose of an Environmental Impact Assessment, namely, to provide a comprehensive, sustainability-oriented basis for authorisation.
81. For the reasons provided in this Appeal, the granting of this EA is fatally flawed and would not withstand judicial scrutiny.
82. The Appeal accordingly should be upheld and the decision to grant the EA set aside.

Yours faithfully,
RICHARD SUMMERS INC.

A handwritten signature in black ink, appearing to read 'R Summers', with a stylized, flowing script.

Per: R W Summers

EIA REFERENCE: 16/3/3/2/A5/20/2046/24
NEAS REFERENCE: WCP/EIA/0001497/2024
DATE OF ISSUE: 27 OCTOBER 2025

The Board of Directors
Capewinlands Aero (Pty) Ltd.
P. O. Box 12449
MILL STREET
8001

For Attention: Mr. Deon Cloete

Cell: 082 339 2807

E-mail: d.cloete@capewinlands.aero

Dear Sir

APPLICATION FOR ENVIRONMENTAL AUTHORISATION 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): THE PROPOSED EXPANSION OF THE EXISTING 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. With reference to the above application, the Department hereby notifies you of the Competent Authority's decision to **grant** Environmental Authorisation, attached herewith, together with the reasons for the decision.
2. In terms of Regulation 4 of the EIA Regulations, 2014 (as amended), you are instructed to ensure, within fourteen (14) days of the date of the decision on the application, that all registered Interested and Affected Parties ("I&APs") are provided with access to the decision and reasons for the decision, and that all registered I&APs are notified of their right to appeal.
3. Your attention is drawn to Chapter 2 of the National Appeal Regulations, 2025 (as amended), which prescribes the appeal procedure to be followed. This procedure is summarised in the Environmental Authorisation below.

Your interest in the future of the environment is greatly appreciated.

Yours faithfully

Zaahir Toefy Digitally signed by Zaahir Toefy
Date: 2025.10.27 21:19:42
+02'00'

MR. ZAAHIR TOEFY
DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)
WESTERN CAPE GOVERNMENT: ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Copied to:

- (1) Ms. Amanda Fritz-Whyte (PHS Consulting)
- (2) Mr. Paul Slabbert (PHS Consulting)
- (3) Ms. Sonja Warnich-Stemmet (City of Cape Town)

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EIA REFERENCE: 16/3/3/2/A5/20/2046/24
NEAS REFERENCE: WCP/EIA/0001497/2024

ENVIRONMENTAL AUTHORISATION

APPLICATION FOR ENVIRONMENTAL AUTHORISATION 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): 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

With reference to your application for the abovementioned, find below the outcome with respect to this application.

DECISION

By virtue of the powers conferred on it by the NEMA and the EIA Regulations, 2014 (as amended), the Competent Authority herewith **grants Environmental Authorisation** to the applicant to undertake the Listed Activities specified in Section B below with respect to Alternative 2, described in the final EIA Report (dated 1 July 2025).

In terms of the NEMA and the EIA Regulations, 2014 (as amended), the Competent Authority hereby **adopts the Maintenance Management Plan ("MMP")** submitted together with the final EIA Report.

The applicant for the application for Environmental Authorisation is required to comply with the Conditions set out in Section E below.

A. DETAILS OF THE HOLDER FOR THIS ENVIRONMENTAL AUTHORISATION

Capewinlands Aero (Pty) Ltd.
C/O Mr. Deon Cloete
P. O. Box 12449
MILL STREET
8001

Cell: 082 339 2807
E-mail: d.cloete@capewinlands.aero

The abovementioned applicant is the holder of this Environmental Authorisation and is hereinafter referred to as "**the holder**".

B. LISTED ACTIVITIES AUTHORISED

Listed Activity	Activity/Project Description
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 9 Activity Description: <i>"The development of infrastructure exceeding 1 000 metres in length for the bulk transportation of water or storm water—</i> <i>(i) with an internal diameter of 0,36 metres or more; or</i> <i>(ii) with a peak throughput of 120 litres per second or more;</i> <i>excluding where—</i> <i>(a) such infrastructure is for bulk transportation of water or storm water or storm water drainage inside a road reserve or railway line reserve; or</i> <i>(b) where such development will occur within an urban area."</i>	The development proposal includes the installation of stormwater infrastructure exceeding 1 000 metres in length with an internal diameter of more than 0,36 metres on a site located outside an Urban Area.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 10 Activity Description: <i>"The development and related operation of infrastructure exceeding 1 000 metres in length for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes –</i> <i>(i) with an internal diameter of 0,36 metres or more; or</i> <i>(ii) with a peak throughput of 120 litres per second or more;</i> <i>excluding where—</i> <i>(a) such infrastructure is for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes inside a road reserve or railway line reserve; or</i> <i>(b) where such development will occur within an urban area."</i>	The development proposal includes the installation of sewer- and non-potable water supply infrastructure exceeding 1 000 metres in length with an internal diameter of more than 0,36 metres on a site located outside an Urban Area.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 12 Activity Description: <i>"The development of—</i> <i>(i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or</i> <i>(ii) infrastructure or structures with a physical footprint of 100 square metres or more;</i> <i>where such development occurs—</i> <i>(a) within a watercourse;</i> <i>(b) in front of a development setback; or</i>	The development proposal includes the installation of infrastructure with a physical footprint that exceeds 100m² within 32m of a watercourse on a site located outside an Urban Area.

(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; — excluding— (aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies; (dd) where such development occurs within an urban area; (ee) where such development occurs within existing roads, road reserves or railway line reserves; or (ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared."	
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 13 Activity Description: <i>"The development of facilities or infrastructure for the off-stream storage of water, including dams and reservoirs, with a combined capacity of 50 000 cubic metres or more, unless such storage falls within the ambit of activity 16 in Listing Notice 2 of 2014."</i>	The development proposal includes the establishment of attenuation ponds for stormwater management with a combined capacity of 50 000 cubic metres or more.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 16 Activity Description: <i>"The development and related operation of facilities for the desalination of water with a design capacity to produce more than 100 cubic metres of treated water per day."</i>	The development proposal includes the development of a desalination facility for the treatment of more than 100m³ of groundwater per day.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 19 Activity Description: <i>"The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;</i> <i>but excluding where such infilling, depositing, dredging, excavation, removal or moving—</i> (a) will occur behind a development setback;	The development proposal includes the infilling or depositing, dredging, excavation, removing or moving of more than 10 cubic metres of material from- and/or into a watercourse and wetlands.

(b) is for maintenance purposes undertaken in accordance with a maintenance management plan; (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or (e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies."	
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 24 Activity Description: "The development of a road— (i) for which an environmental authorisation was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010; or (ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres; but excluding a road— (a) which is identified and included in activity 27 in Listing Notice 2 of 2014; (b) where the entire road falls within an urban area; or (c) which is 1 kilometre or shorter."	The development proposal includes the establishment of several roads with a reserve wider than 13,5 meters, or where no reserve exists, where the roads are wider than 8 metres.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 25 Activity Description: "The development and related operation of facilities or infrastructure for the treatment of effluent, wastewater or sewage with a daily throughput capacity of more than 2 000 cubic metres but less than 15 000 cubic metres."	The development proposal includes the development of a sewage treatment facility with a daily throughput capacity of more than 2 000 cubic metres but less than 15 000 cubic metres.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 26 Activity Description: "Residential, retail, recreational, tourism, commercial or institutional developments of 1 000 square metres or more, on land previously used for mining or heavy industrial purposes; — excluding — (i) where such land has been remediated in terms of part 8 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the National Environmental Management: Waste Act, 2008 applies; or (ii) where an environmental authorisation has been obtained for the decommissioning of such a mine	The proposal includes the development of commercial, tourism and retail components that exceeds 1 000 square metres, on a site that was previously used for mining purposes.

or industry in terms of this Notice or any previous NEMA notice; or (iii) where a closure certificate has been issued in terms of section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) for such land."	
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 28 Activity Description: "Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes."	The proposed development includes the transformation of agricultural land that exceeds 5 hectares on a site located outside an Urban Area.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 48 Activity Description: "The expansion of— (i) infrastructure or structures where the physical footprint is expanded by 100 square metres or more; or (ii) dams or weirs, where the dam or weir, including infrastructure and water surface area, is expanded by 100 square metres or more; where such expansion occurs— (a) within a watercourse; (b) in front of a development setback; or (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding— (aa) the expansion of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such expansion activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 23 in Listing Notice 3 of 2014, in which case that activity applies; (dd) where such expansion occurs within an urban area; or	The development proposal includes the expansion of infrastructure by more than 100m² within a watercourse and/or within 32m of a watercourse and wetlands.

(ee) where such expansion occurs within existing roads, road reserves or railway line reserves."	
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 56 Activity Description: <i>"The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre—</i> <i>(i) where the existing reserve is wider than 13,5 meters;</i> <i>or</i> <i>(ii) where no reserve exists, where the existing road is wider than 8 metres;</i> <i>excluding where widening or lengthening occur inside urban areas."</i>	The development proposal includes the widening of existing roads by more than 6 metres, where the reserve is wider than 13,5 meters on a site located outside an Urban Area.
Listing Notice 1 of the EIA Regulations, 2014 (as amended)– Activity Number: 61 Activity Description: <i>"The expansion of airports where the development footprint will be increased."</i>	The development proposal includes the expansion of an existing airport, resulting in an increased development footprint.
Listing Notice 2 of the EIA Regulations, 2014 (as amended)– Activity Number: 1 Activity Description: <i>"The development of facilities or infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more, excluding where such development of facilities or infrastructure is for photovoltaic installations and occurs —</i> <i>(a) within an urban area; or</i> <i>(b) on existing infrastructure."</i>	The development proposal includes the installation of infrastructure for the generation of electricity from a renewable resource where the electricity output is 20 megawatts or more on a site that is located outside an Urban Area.
Listing Notice 2 of the EIA Regulations, 2014 (as amended)– Activity Number: 4 Activity Description: <i>"The development and related operation of facilities or infrastructure, for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of more than 500 cubic metres."</i>	The development proposal includes the storage of dangerous goods at various facilities on the site, with a combined capacity of more than 500 cubic metres.
Listing Notice 2 of the EIA Regulations, 2014 (as amended)– Activity Number: 7 Activity Description: <i>"The development and related operation of facilities or infrastructure for the bulk transportation of dangerous goods—</i> <i>(i) in gas form, outside an industrial complex, using pipelines, exceeding 1 000 metres in length, with</i>	The development proposal includes the installation of a feeder pipeline for the transfer of dangerous goods with a throughput of approximately 312m³/day and a length exceeding 1000 metres.

<i>a throughput capacity of more than 700 tons per day;</i> (ii) <i>in liquid form, outside an industrial complex, using pipelines, exceeding 1 000 metres in length, with a throughput capacity of more than 50 cubic metres per day; or</i> (iii) <i>in solid form, outside an industrial complex, using funiculars or conveyors with a throughput capacity of more than 50 tons per day."</i>	
Listing Notice 2 of the EIA Regulations, 2014 (as amended)– Activity Number: 15 Activity Description: <i>"The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for—</i> (i) <i>the undertaking of a linear activity; or</i> (ii) <i>maintenance purposes undertaken in accordance with a maintenance management plan."</i>	The development proposal includes the clearance of more than 20 hectares of indigenous vegetation.
Listing Notice 2 of the EIA Regulations, 2014 (as amended)– Activity Number: 27 Activity Description: <i>"The development of a road—</i> (i) <i>.....</i> (ii) <i>.....</i> (iii) <i>with a reserve wider than 30 metres; or</i> (iv) <i>catering for more than one lane of traffic in both directions;</i> <i>but excluding a road—</i> (a) <i>for which an environmental authorisation was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010, in which case activity 24 in Listing Notice 1 of 2014 applies;</i> (b) <i>which is 1 kilometre or shorter; or</i> (c) <i>where the entire road falls within an urban area."</i>	The proposal includes the development of roads catering for more than one lane of traffic in both directions.
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 1 Activity Description: <i>"The development of billboards exceeding 18 square metres in size outside urban areas, mining areas or industrial complexes.</i> i. <i>Western Cape</i> i. <i>All areas outside urban areas, mining areas or industrial complexes."</i>	The development proposal includes the installation of billboards exceeding 18 square metres in size on the site located outside an Urban Area.

Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 2 Activity Description: <i>"The development of reservoirs, excluding dams, with a capacity of more than 250 cubic metres.</i> i. Western Cape i. A protected area identified in terms of NEMPAA, excluding conservancies; ii. In areas containing indigenous vegetation; or iii. Inside urban areas: (aa) Areas zoned for use as public open space; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority, or zoned for a conservation purpose."	The development proposal includes the development of reservoirs with a total capacity of more than 250 cubic metres on a site that contains indigenous vegetation.
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 3 Activity Description: <i>"The development of masts or towers of any material or type used for telecommunication broadcasting or radio transmission purposes where the mast or tower—</i> (a) <i>is to be placed on a site not previously used for this purpose; and</i> (b) <i>will exceed 15 metres in height—</i> <i>but excluding attachments to existing buildings and masts on rooftops.</i> i. Western Cape i. All areas outside urban areas; ii. Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority, or zoned for a conservation purpose, within urban areas; or iii. Areas zoned for use as public open space or equivalent zoning within urban areas."	The development proposal includes the development of towers exceeding 15 metres in height on a site located outside an Urban Area.
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 4 Activity Description: <i>"The development of a road wider than 4 metres with a reserve less than 13,5 metres.</i> i. Western Cape i. Areas zoned for use as public open space or equivalent zoning; ii. Areas outside urban areas; (aa) Areas containing indigenous vegetation; (bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or	The development proposal includes the establishment of roads wider than 4 metres with a reserve less than 13,5 metres on a site that contains indigenous vegetation located outside an Urban Area.

iii. Inside urban areas: (aa) Areas zoned for conservation use; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority."	
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 12 Activity Description: "The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. i. Western Cape i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004; ii. Within critical biodiversity areas identified in bioregional plans; iii. Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas; iv. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or v. On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister."	The development proposal includes the clearance of more than 300m² of Critically Endangered indigenous vegetation.
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 18 Activity Description: "The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre. i. Western Cape i. Areas zoned for use as public open space or equivalent zoning; ii. All areas outside urban areas: (aa) Areas containing indigenous vegetation; (bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or iii. Inside urban areas: (aa) Areas zoned for conservation use; or	The development proposal includes the widening of roads by more than 4 metres on a site that contains indigenous vegetation located outside an Urban Area.

(bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority."	
Listing Notice 3 of the EIA Regulations, 2014 (as amended)– Activity Number: 19 Activity Description: <i>"The expansion of runways or aircraft landing strips where the expanded runways or aircraft landing strips will be longer than 1,4 kilometres in length.</i> i. Western Cape i. All areas outside urban areas."	The development proposal includes the expansion of the existing landing strip by more than 1,4 kilometres on a site located outside an Urban Area.

The abovementioned list is hereinafter referred to as **"the Listed Activities"**.

The holder is herein authorised to undertake the abovementioned Listed Activities for the below Alternative, which entails the expansion of the existing Cape Winelands Airport ("CWA"), comprising the development of five precincts, one of which will be the Agricultural Precinct. The remaining four precincts, *namely*; the Services Precinct, the Airside Precinct, the Terminal Precinct, and the General Aviation Precinct, will be developed in two distinct phases. After the implementation of Phase 1 stipulated below, Phase 2 will evolve in response to market demand.

Phase 1:

- An Agricultural Precinct, measuring approximately 462ha in extent, comprises the continuation of the existing agricultural component. This Precinct includes the construction of the following:
 - an existing main access roads and internal farm roads left unchanged;
 - areas of intact vegetation respected as 'no-go' areas for conservation;
 - establishment of the required firebreaks;
 - establishment of wetland rehabilitation;
 - establishment of designated wetland offset areas;
 - construction and installation of associated stormwater infrastructure; and
 - fence line on the outer perimeter and a shared security fence line with the Airside precinct.
- A Services Precinct, measuring approximately 65ha, which will include the construction of the following:
 - a maintenance repairs and operational hanger;
 - an aircraft sanitary station;
 - an airport maintenance facility/area;
 - a catering building;
 - a Ground Support Equipment ("GSE") staging and maintenance facility;
 - a Fuel farm;
 - a cargo terminal;
 - an Aircraft Rescue and Firefighting facility;
 - an Operations Centre ("OPS");
 - an Air Traffic Control centre;
 - an Eskom incoming and Substations;
 - a groundwater and potable water treatment facility and storage area;
 - a water pump station;
 - a non-potable treatment facility and storage area;
 - a solid waste area;
 - a firefighting water pump station;
 - areas for airport use; and
 - internal road and services configuration.

- An Airside Precinct, measuring approximately 249ha, which will include the construction of the following:
 - a primary runway of measuring approximately 3.5km in length at an orientation of approximately 01-19 and taxi ways;
 - Solar Photovoltaics ("PV") ;
 - airport parking;
 - a maintenance repairs and operations apron;
 - a cargo apron;
 - an Eskom incoming and substation;
 - a Remote Digital Control Tower System;
 - Localizer, Glidepath antennae, and Precision Approach Path Indicator ("PAPI");
 - Runway End Safety Areas ("RESA") areas around the runway and taxi lanes;
 - Landscaping;
 - firebreaks;
 - establishment of conservation areas;
 - establishment of re-vegetated areas; and
 - internal road and services configuration.

- A Terminal Precinct, measuring approximately 57ha, which will include the construction of the following:
 - landscaping;
 - a passenger terminal building;
 - a car rental and public transport;
 - parking, pick up and drop off area
 - GSE staging;
 - cargo;
 - an energy centre and aircraft sanitary station;
 - a land side substation ("LSS");
 - a hotel;
 - various areas for airport use;
 - aero vintage;
 - restaurants;
 - a petrol and diesel service station;
 - access roads, internal roads and associated infrastructure; and
 - Internal road and services configuration.

- A General Aviation Precinct, measuring approximately 50ha, which will include the construction of the following:
 - a General Aviation/VIP/Government terminal;
 - parking
 - fixed base operators
 - General Aviation hangars
 - a General Aviation Clubhouse and fueling facility;
 - a special cargo facility;
 - an OPS (Operations Centre);
 - access control areas;
 - areas for airport use;
 - a heliport;
 - internal road and services configuration; and
 - signage and billboards.

- Associated infrastructure and components which will include the construction of the following:
 - a sewage pipeline leading to the Fisantekraal Waste Water Treatment Works ("WWTW");
 - a potable waterline;
 - on-site stormwater infrastructure;
 - an Eskom line;
 - access roads and alignment;
 - Solar PV (on buildings);

- perimeter fencing; and
- firebreaks.

Phase 2:

- Continued use of the abovementioned Agricultural Precinct, comprising of the following:
 - areas of intact vegetation for conservation purposes;
 - firebreaks;
 - wetland rehabilitation;
 - wetland offset;
 - existing agricultural areas remaining intact;
 - existing access roads remaining;
 - stormwater infrastructure;
 - a fence line; and
 - a shared security fence line with the Airside precinct.
- Continued use of the abovementioned Services Precinct, which will include the construction of the following:
 - groundwater containment and treatment measures;
 - sewage containment and treatment;
 - containment of treated sewage water (inclusive of emergency storage) and pumpstation;
 - a solid waste area
 - a biodigester (using grass feedstock and treated sewage water);
 - Eskom incoming and LS substation;
 - a firefighting water pump station
 - an Aircraft sanitary station;
 - maintenance, repair, and overhaul ("MRO") hangar;
 - a maintenance area;
 - a parking area;
 - a catering building;
 - GSE maintenance and staging area;
 - a fuel farm and underground fuel line
 - a substation
 - a cargo terminal;
 - Aircraft Rescue and Fire Fighting ("ARFF");
 - an OPS (Operations Centre);
 - an Air Traffic Control Tower
 - an Existing quarry to be used for stormwater retention;
 - internal road and services configuration; and
 - landscaping.
- Continued use of the abovementioned Airside Precinct, which will include the construction of the following:
 - a 3.5km long runway;
 - taxi areas;
 - solar PV;
 - aircraft parking;
 - an MRO apron;
 - a cargo apron;
 - Eskom incoming and substations;
 - a Remote Digital Control Tower System ("RDTS")
 - a PAPI;
 - internal road and services configuration;
 - an underground fuel line;
 - RESA areas around the runway and taxi lanes
 - landscaping;
 - firebreaks;
 - conservation areas; and
 - re-vegetated areas.

- Continued use of the abovementioned Terminal Precinct, which will include the construction of the following:
 - landscaping;
 - a passenger terminal building;
 - a car rental and public transport facility;
 - a parking, pick up and drop off facility;
 - pier expansion reservation;
 - a terminal reserve;
 - GSE staging area;
 - Cargo area;
 - an energy centre and aircraft sanitary station;
 - an LS SS (Land Side Substation);
 - two (2) hotels;
 - airport use area;
 - aero vintage;
 - restaurants
 - a service station; and
 - internal road and services configuration.
- Continued use of the abovementioned General Aviation Precinct, which will include the construction of the following:
 - General Aviation/VIP/Government Terminal;
 - parking;
 - fixed base operators;
 - General Aviation Hangers;
 - General Aviation clubhouse and fueling;
 - a special cargo facility;
 - an OPS (Operations Centre);
 - an access control facility;
 - transport use area;
 - airport use, i.e., associated buildings and facilities and uses supplementary to the runway use;
 - heliport;
 - internal road and services configuration; and
 - landscaping.

The total development footprint amounts to approximately 883ha in extent.

C. SITE DESCRIPTION AND LOCATION

The Listed Activities will be undertaken 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. The overall site is generally bordered by the R312 Regional Road and Garden Cities Urban residential development in the South.

The SG 21-digit codes are given below:

Farm No.	SG 21-digit code
Portion 10 of the Farm No. 724	C05500000000072400010
Remaining Extent of the Farm No. 724	C05500000000072400000
Portion 23 of the Farm No. 724	C05500000000072400023
Portion 7 of the Farm No. 942	C04600000000094200007
Remaining Extent of the Farm No. 474	C05500000000047400000
Portion 3 of the Farm No. 474	C05500000000047400003
Portion 4 of the Farm No. 474	C05500000000047400004

The co-ordinates are given below:

Farm No.	Co-ordinates	
Portion 10 of the Farm No. 724	33°46'13.90"S	18°44'21.28"E

Remaining Extent of the Farm No. 724	33°45'49.16"S	18°44'0.07"E
Portion 23 of the Farm No. 724	33°45'27.43"S	18°43'54.68"E
Portion 7 of the Farm No. 942	33°44'30.59"S	18°44'8.08"E
Remaining Extent of the Farm No. 474	33°45'11.48"S	18°44'41.56"E
Portion 3 of the Farm No. 474	33°45'48.21"S	18°44'37.51"E
Portion 4 of the Farm No. 474	33°46'8.83"S	18°44'41.85"E

Runway and strip co-ordinates:

Point Number	Easting	Northing	Full Description	Longitude	Latitude
1	-23629.1333	-3738473.4669	RWY01-BP-START	E18° 44' 41.67"	S33° 46' 21.56"
2	-23674.0587	-3738362.1937	RWY01-THR	E18° 44' 39.94"	S33° 46' 17.94"
3	-24329.2203	-3736739.4605	RWY01-19-CENTER	E18° 44' 14.64"	S33° 45' 25.22"
4	-24984.3820	-3735116.7272	RWY19-THR	E18° 43' 49.34"	S33° 44' 32.50"
5	-25029.3074	-3735005.4541	RWY19-BP-START	E18° 43' 47.61"	S33° 44' 28.88"



Potable line incoming co-ordinates:

Start point	33°46'35.4496"S	18°44'08.0467"E
Middle point	33°46'40.5740"S	18°43'40.2163"E
End point	33°46'59.7546"S	18°42'44.5603"E

Sewage line outgoing to Fisantekraal WWTW co-ordinates:

Start point	33°45'05.4015"S	18°43'46.0530"E
Middle point	33°45'04.3129"S	18°43'35.4933"E
End point	33°45'07.2134"S	18°43'28.2157"E

Refer to **Annexure 1**: Locality Maps. Refer to **Annexure 2**: Spatial Plan.
The above property is hereinafter referred to as "**the site**".

D. DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

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HERMANUS
7200

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E. CONDITIONS OF AUTHORISATION

Scope of Authorisation

1. The holder is authorised to undertake the Listed Activities specified in Section B above in accordance with and restricted to Alternative 2 described in Section B above.
2. The holder must commence with, and conclude, the Listed Activities within the stipulated validity period which this Environmental Authorisation is granted for, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority.

This Environmental Authorisation is granted for –

- (a) A period of ten **(10)** years, from the date of issue, during which period the holder must commence with the authorised Listed Activities.
 - (b) A period of twenty **(20)** years, from the date the holder commenced with the authorised Listed Activities, during which period the authorised Listed Activities must be concluded.
3. The holder shall be responsible for ensuring compliance with the conditions by any person acting on his behalf, including an implementing agent, sub-contractor, employee or any person rendering a service to the holder.
4. Any changes to, or deviations from the scope of the alternative described in section B above must be approved in writing by the Competent Authority before such changes or deviations may be implemented. In assessing whether or not to grant such approval, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.

Written Notice to the Competent Authority

5. A written notice of seven (7) calendar days must be given to the Competent Authority before construction work can be commenced with.
 - 5.1. The notice must make clear reference to the site details and EIA Reference number given above.
 - 5.2. The notice must include proof of compliance with the following Conditions described herein:

Conditions: 6, 7, 9, 12, 29, 31, 32, 37, 38, 40.1, 40.2, 40.3, 41.1., 41.2., 41.13, 41.13.1., 41.13.2., 41.13.3., 41.13.4, 41.13.5., 41.13.6., 46, 47, 49.1., 49.2., 49.3.

Notification of Environmental Authorisation and Administration of Appeal

6. The holder must in writing, within fourteen (14) calendar days of the date of this decision–
 - 6.1. notify all registered Interested and Affected Parties ("I&APs") of –
 - 6.1.1. the decision reached on the application.
 - 6.1.2. the reasons for the decision as included in Annexure 4;
 - 6.1.3. the date of the decision; and
 - 6.1.4. the date when the decision was issued.
 - 6.2. draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2025 detailed in Section F below;

- 6.3. draw the attention of all registered I&APs to the manner in which they may access the decision;
- 6.4. provide the registered I&APs with the:
 - 6.4.1. name of the holder (entity) of this Environmental Authorisation;
 - 6.4.2. name of the responsible person for this Environmental Authorisation;
 - 6.4.3. postal address of the holder;
 - 6.4.4. telephonic and fax details of the holder;
 - 6.4.5. e-mail address, if any, of the holder; and
 - 6.4.6. contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the National Appeals Regulations, 2025.

Commencement

7. The Listed Activities, including site preparation, must not be commenced with within (20) twenty calendar days from the date the holder notifies the registered I&APs of this decision.
8. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided.

Management of Activity

9. The Environmental Management Programme ("EMPr") (dated July 2025) is hereby approved, subject to the inclusion of the following provision:
 - 9.1. The implementation of the biodiversity offset requirements that have been made conditional to this Environmental Authorisation.
10. The updated EMPr must be submitted to this Directorate for record purposes prior to the commencement of earthmoving- or construction activities.
11. Environmental Authorisation, the EMPr and MMP must be included in all contract documentation for all phases of implementation.

Monitoring

12. The holder must appoint a suitably experienced Environmental Control Officer ("ECO") before the Listed Activities can be commenced with, to ensure compliance with the EMPr and the conditions contained herein. The ECO must submit ECO reports on a quarterly basis for the duration of the construction phase.
13. A copy of the Environmental Authorisation, EMPr, ECO reports, audit reports and compliance monitoring reports must be kept at the contractor's site office during the construction phase and thereafter the said documents must be kept at the office of the holder and must be made available to any authorised official of the Competent Authority on request.
14. Access to the site referred to in Section C must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see the reports for the purposes of assessing and/or auditing compliance with the conditions contained herein.

Auditing

15. In terms of Regulation 34 of the EIA Regulations, 2014 (as amended), the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation and the EMPr. Environmental audit reports must be compiled and submitted to the Competent Authority. Environmental audit reports must be prepared by an independent person with expertise and must contain all the information required in Appendix 7 of the EIA Regulations, 2014 (as amended).
16. The audit reports must be compiled and subsequently submitted to the Competent Authority in the following manner:
 - 16.1. An audit report must be submitted to the Competent Authority within six (6) months of the commencement of the construction phase; and
 - 16.2. A final audit report must be submitted within three (3) months of the proposed development being completed.
 - 16.3. The holder must submit an environmental audit report every five (5) years while the Environmental Authorisation remains valid.
17. The audit report must indicate compliance status with the Conditions of this Environmental Authorisation, and the EMPr and make recommendations for improved environmental management.
18. The holder must, within seven (7) calendar days of the submission of the audit report to the Competent Authority, notify all registered I&APs of the submission and make the audit report available to any registered I&AP on request and, where the holder has such a facility, place on a publicly accessible website.

Specific Conditions

19. Should any heritage remains be exposed during excavations or any other actions on the site, this must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be disturbed further until the necessary approval has been obtained from Heritage Western Cape.

Heritage remains include, *inter alia*, meteorites, archaeological and/or paleontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.
20. A qualified archaeologist and/or paleontologist must be contracted where necessary (at the expense of the holder) to remove any heritage remains. Heritage remains can only be disturbed by a suitably qualified heritage specialist working in accordance with a directive from the relevant heritage resources authority.
21. An integrated waste management approach must be used based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste that cannot be recycled, re-use shall be disposed of at a licensed waste disposal facility.
22. An Emergency Preparedness and Response Plan must be compiled by a suitably qualified person and must be implemented. The finalised Emergency Preparedness and Response Plan that incorporates the comments obtained from the City of Cape Town must be submitted to this Directorate together with the comments obtained prior to the operation of Phase 1.

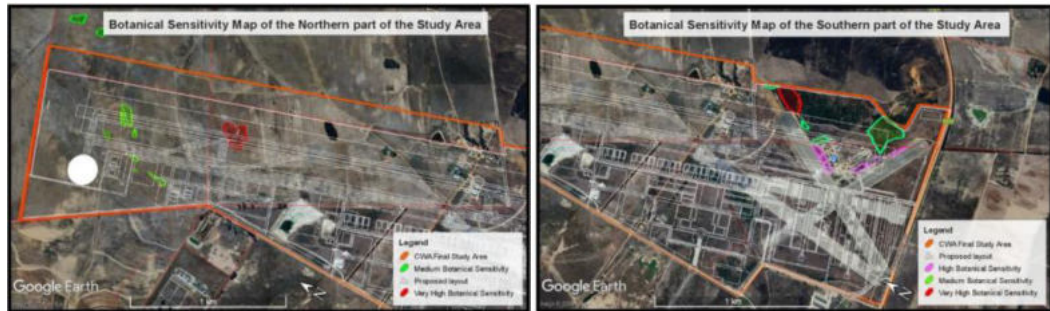
23. A Wildlife Hazard Management Plan must be compiled by a suitably qualified person and must be implemented. The finalised Wildlife Hazard Management Plan that incorporates the comments obtained from the City of Cape Town, the South African Civil Aviation Authority ("SACCA") and CapeNature, must be submitted to this Directorate together with the comments obtained prior to the operation of Phase 1.
24. The Waste Management Plan (dated July 2025 and compiled by PHS Consulting) must be implemented.
25. The Veldfire Management Plan (dated July 2025 and compiled by PHS Consulting) must be implemented.
26. The Alien Vegetation Management Plan (dated July 2025 and compiled by PHS Consulting) must be implemented.
27. A copy of the documentation from the National Department of Water and Sanitation ("DWS"), as it pertains to the wetland offset must be submitted to this Directorate for record purposes.
28. Landscaping Plans for each Precinct must be compiled with input from a suitably qualified specialist botanist and must be implemented. The botanist must advise on, *inter alia*, the use of indigenous Sand Fynbos and Renosterveld appropriate plant component, maximising biodiversity rehabilitation, remaining cognisant of the airport safety guidelines and hydroseeded requirements. Copies of the approved Landscaping Plans must be submitted together with the approval letters prior to the commencement of landscaping for each Precinct.
29. Urban Design Guidelines addressing aspects of fencing, walls, entrances and boundary interfaces, lighting as well as materials and finishes, must be implemented for the development. Copies of the Urban Design Guidelines submitted to the City of Cape Town for approval/input and must be submitted to this Directorate together with the comments obtained for record purposes prior to the commencement of earthmoving- or construction activities.
30. The Groundwater Monitoring and Management Plan must be implemented. A copy of the Groundwater Monitoring and Management Plan approved by the National Department of Water and Sanitation must be submitted to this Directorate for record purposes prior to the operation of Phase 1.
31. A Dust Management Plan must be implemented. The Dust Management Plan, approved by the relevant authority, must be submitted to this Directorate for record purposes prior to the commencement of earthmoving- and construction activities.
32. A Water Scarcity Management Plan must be developed by a suitably qualified specialist to mitigate water scarcity risks and must be implemented. The Water Scarcity Management Plan must be submitted to this Directorate prior to the commencement of earthmoving- and construction activities.
33. The Maintenance Management Plan submitted together with the final EIA Report must be implemented.
34. Based on the Botanical Biodiversity Offset Agreement (dated 29 September 2024), which has been signed by the relevant parties contained therein, the following must be implemented:
 - 34.1. The holder of this Environmental Authorisation must secure the biodiversity offset site through the provision of the necessary resources, as follows:
 - 34.1.1. Ensure the formal protection and effective ecological management of a minimum 89ha of Critically Endangered indigenous vegetation for thirty

(30) years, i.e. Swartland Silcrete, Shale- and Granite Renosterveld vegetation within the northern extent of the Farm Hercules Pilaar No. 1242, Paarl, as delineated in the dark red polygon depicted in Annexure 3 of this Environmental Authorisation:

- 34.1.2. The offset-receiving area must be secured under a formal conservation protection status, in accordance with the recommendation of the CapeNature Stewardship Advisory Committee and the applicable stewardship category endorsed by CapeNature.
- 34.2. The identified offset site must be presented to the CapeNature Stewardship Advisory Committee within two (2) years of the date of this Environmental Authorisation and proof thereof submitted to this Directorate within one (1) calendar week of such presentation having taken place.
- 34.3. The identified offset site must be secured under formal conservation protection, with the aim of achieving its declaration, as a Nature Reserve in terms of the National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEM: PAA"). This process must include the implementation of title deed restrictions and rezoning under an appropriate stewardship category, as recommended by the CapeNature Stewardship Advisory Committee, within five (5) years from the date of issue of this Environmental Authorisation. Proof of progress towards, and/or confirmation of, the formal declaration and acquired protection status must be submitted to this Directorate, as part of the environmental audit reporting required in terms of Condition 15 of this Environmental Authorisation.
- 34.4. The Botanical Biodiversity Offset Agreement (dated 29 September 2024) entered into between the holder of this Environmental Authorisation and the joint owners of the Farm Hercules Pilaar No. 1242, Paarl must be subject to regular independent audits to ensure the effective implementation of the biodiversity offset, as follows:
 - 34.4.1. Independent audits must be undertaken annually during the construction phase and at least every five (5) years thereafter, until such time as the offset site has been formally declared and received the required Protection Status.
 - 34.4.2. Each independent auditor must assess and report on the following:
 - 34.4.2.1. The ecological condition and performance of the minimum 89ha offset site;
 - 34.4.2.2. The adequacy and effectiveness of the resources provided to achieve the offset objectives; and
 - 34.4.2.3. The need for any corrective or adaptive management measures required to meet the intended conservation outcomes.
 - 34.4.3. The holder of this Environmental Authorisation in collaboration with the identified Public Benefit Organisation must ensure that the offset areas are actively managed and maintained to achieve and sustain the required ecological condition.
- 35. A final Biodiversity Offset Management Plan must be compiled by a suitable qualified biodiversity offset consultant and must be implemented for the approved offset site. The final Biodiversity Offset Management Plan, which incorporates comments from CapeNature and the relevant City of Cape Town Biodiversity Management Branch, must be compiled prior to the biodiversity offset receiving the required Protection Status. The final Biodiversity Offset Management Plan must be submitted to this Directorate for record purposes together with the comments obtained.
- 36. The costs of securing and managing the offset site for first thirty (30) years must be the sole responsibility of the holder of this Environmental Authorisation.

37. The approved Stormwater Management Plan must be implemented to adequately manage stormwater and avoid, or if not possible, mitigate the associated stormwater-related impacts. The approved Stormwater Management Plan that incorporates comments from the City of Cape Town must be submitted to this Directorate together with the comments, prior to the commencement of earthmoving- and construction activities.
38. The Bird and Wildlife Hazard Management Landscape and Open Space Planning Guideline (dated February 2024 and compiled by Avri Avian Environmental) must be implemented. The Bird and Wildlife Hazard Management Landscape and Open Space Planning Guideline that incorporates comments from the City of Cape Town, the SACAA and CapeNature, must be submitted to this Directorate together with the comments obtained, prior to the commencement of earthmoving- and construction activities.
39. A detailed Process Hazard Analysis / Hazard and Operability Study ("HAZOP") must be completed for the entire development by an independent chairperson who is registered with the Engineering Council of South Africa and must be implemented. The final Process Hazard Analysis / HAZOP that incorporates comments from the City of Cape Town: Fire and Rescue Services Department must be submitted to this Directorate together with the comments obtained, prior to the commencement of operational activities under Phase 1.
40. The following measures, adapted from the Visual Impact Assessment Report (dated 26 February 2025 and compiled by Filia Visual (Pty) Ltd), must be implemented:
 - 40.1. An Overall Lighting Report must be prepared by a suitably qualified electrical engineer and must be implemented. The approved Overall Lighting Report that incorporates comments from the City of Cape Town must be submitted to this Directorate together with the comments obtained, prior to the commencement of earthmoving- and construction activities.
 - 40.2. A detailed Lighting proposal for all outdoor lighting, i.e., façade lighting (if any), street lighting and security lighting would be visible from within the receiving environment that focuses on the sensitivities of the adjacent cultural Landscape and the relevant scenic routes, must be prepared and implemented. The approved Lighting proposal that incorporates comment from the City of Cape Town must be submitted to this Directorate together with the comments obtained, prior to the commencement of operations of Phase 1.
 - 40.3. A Signage Plan must be developed in terms of the Outdoor Advertising and Signage Policy and By-law and must be implemented. A copy of the approved signage plan that incorporates comments from the City of Cape Town must be submitted to this Directorate together with the comments obtained for record purposes prior to any signage being erected on the site.
41. The following measures adapted from the Plant Species Impact Assessment Report (dated 10 February 2025 and compiled by Nick Helme Botanical Surveys), must be implemented:
 - 41.1. All hard infrastructure bordering on any of the mapped areas of 'Very High', 'High' and 'Medium' sensitivity botanical areas must be surveyed and fenced off. The fencing must be marked with signage to indicate that these are 'no-go' areas at 15m intervals, prior to any commencement of earthmoving- or construction activities.
 - 41.2. Where the perimeter of fenced off areas are positioned within 20m of the RESA (runway clearance area), it must be buffered by an ecological buffer area of at least 5m wide that is not disturbed by any earthmoving activities or development.
 - 41.3. No perimeter service road may traverse nor disturb the mapped areas of 'Very High' sensitivity east of the main runway.

- 41.4. All 'Very High', 'High' and 'Medium' sensitivity areas in the below image that fall outside the development (construction) footprint must be appropriately conserved, which must include but not limited, no development and no infrastructure being located in these areas, ecologically connecting these areas with other areas via rehabilitation, and ongoing alien invasive vegetation management.



- 41.5. All invasive alien vegetation in the conservation areas on the site must be removed within one (1) year of the date of issue of this Environmental Authorisation, by appropriately qualified personnel.
- 41.6. Ongoing annual alien vegetation removal must be undertaken.
- 41.7. No spraying of herbicide must be undertaken in any conservation area.
- 41.8. Once all alien invasive vegetation has been removed from the conservation areas all these areas must be subject to planned (controlled) burn regimes that must be professionally managed.
- 41.9. Prior to the controlled burn, firebreaks must be established around the perimeter of the sensitive areas (not within them) using handheld brush cutters. No heavy machinery must be used to establish the firebreaks.
- 41.10. The botanically sensitive areas must be burnt every 8-12 years for optimum ecological functioning.
- 41.11. The 'Very High' sensitivity areas falling within the Agricultural Precinct must be fenced off and excluded from grazing and trampling by livestock (especially cattle). The fencing off of this area must be completed within sixty (60) days of the date of issue of this Environmental Authorisation.
- 41.12. The conditions of all 'Very High', 'High' and 'Medium' sensitivity area, which includes the Agricultural Precinct, must be monitored every year by a suitably qualified botanist. The appointed botanist must make recommendations for any management changes or actions, i.e., alien clearing, lack of fire, etc., that are needed in order to achieve optimal ecological functioning in these areas.
- 41.13. A search and rescue operation must be done in consultation with the botanist. The search and rescue operation must be undertaken prior to the commencement of earthmoving- or construction activities, and must include the following:
- 41.13.1. The translocation of Species of Conservation Concern ("SCC") searched and rescued within the development footprint;
 - 41.13.2. The translocation of plants and material searched and rescued within the 'Very High', 'High' and 'Medium' sensitivity areas;
 - 41.13.3. The collection of seed, sods and cuttings;

- 41.13.4. Keeping record of where the collected seed, sods and cuttings were stored and the quantities of seed, sods and cuttings stored;
- 41.13.5. Keeping record of how the receiving sites were identified and prepared to receive the collected seed, sods and cuttings; and
- 41.13.6. Implementing measures that will guide ongoing maintenance of the receiving areas.
- 41.14. Brush cutting and mowing of open airside (hydroseeded) areas during the operational phase must be timed to allow for winter growth, spring flowering and early summer fruiting of most of the indigenous plant species and must thus not be undertaken between 1 June and 15 October (provided that this is not in conflict with operational safety protocols).
- 42. The following measures adapted from the final EIA Report (dated July 2025 and compiled by PHS Consulting), must be implemented:
 - 42.1. A certified Pest Control Company must be appointed at the onset of the construction- and operational phases to ensure that preventative measures are put in place. The measures must be monitored to ensure the effectiveness of the Pest Control measures being implemented. Should any recommendations for improvements be required, then such information must be included in a revised Waste Management Plan that must be implemented. The updated Waste Management Plan must be submitted to this Directorate for record purposes.
 - 42.2. The Colenso Fault located to the north-east section of the site, must be treated as a 'no-go' area to ensure that high-risk activities such as the aviation fuel farm, bulk fuel storage, retail service station or other associated activities are prohibited within this area.
 - 42.3. The Agricultural Precinct must be treated as a 'no-go' area throughout the lifecycle of the development.
 - 42.4. The exposed water surface area of the rehabilitated quarry must be suitably covered, as far as possible, in order to mitigate the attraction of birdlife.
 - 42.5. Suitable vegetation must be planted on either side of the ponds to discourage bird movement between ponds.
- 43. The obstacles listed under Appendix A of this Decision must be clearly marked and identified with day and night markings of buildings and obstacles.
- 44. The following measures adapted from the Air Quality Impact Assessment Report (dated June 2025 and compiled by DDA Environmental Engineers), must be implemented:
 - 44.1. Dust monitoring along the western, southern and northern boundaries must be conducted monthly during construction and reported quarterly to the relevant authorities, including this Directorate. Any noted exceedances in the prescribed guidelines and requirements, e.g., municipal by-laws, must be treated with appropriate rectification measures and proof thereof included in the report to be submitted to the relevant authorities.
 - 44.2. A continuous air quality monitoring station must be established along the northern boundary of the site prior to the operational phase. The air quality monitoring station must monitor air pollutants, including SO₂, NO_x, PM¹⁰ and Benzene. The monitoring results must be reported to the relevant authorities, including this Directorate on a biannual basis (six monthly). Any noted exceedances in the prescribed guidelines and requirements must be treated with appropriate

rectification measures and proof thereof included in the report to be submitted to the relevant authorities.

45. The following measures adapted from the Noise Impact Assessment Report (dated June 2025 and compiled by DDA Environmental Engineers), must be implemented:
 - 45.1. Noise mitigation measures must be finalised prior to commencement of the operation in terms of Scenario 3, *i.e.*, operation of the new runway at full capacity taking place. A copy of the finalised noise mitigation measures that must be implemented accordingly must be submitted to this Directorate as well as all relevant authorities and stakeholders prior to the commencement and operation in terms of the abovementioned Scenario 3 taking place.
 - 45.2. Noise monitoring in accordance with the relevant methods stipulated in the South African National Standards ("SANS") codes and current Western Cape Noise Control Regulations, 2013 (Provincial Notice 200 of 2013), must be conducted on a quarterly basis during the construction phase and conducted monthly when night-time construction takes place.
 - 45.2.1. Quarterly reports must be submitted to the relevant authorities as well as this Directorate.
 - 45.2.2. The quarterly reports must report any construction-specific noise exceedances above the noise standards and measures stipulated in the SANS 10103:2008 and SANS 10328:2008 (or latest versions).
 - 45.2.3. In the event of exceeding the said noise standards and measures, appropriate site- and operation-specific noise mitigation measures must be investigated and implemented, and proof thereof included in subsequent reports submitted to the relevant authorities as well as this Directorate.
 - 45.3. A noise complaints registry must be established and connected with the noise monitoring system, in order to provide the capability for correlation of the complaints with the actual measured levels, as well as the aircraft-related operational data. The complaints and relevant aircraft-related operational data must be included in the quarterly reports submitted to the relevant authorities.
 - 45.4. Three permanent noise monitoring terminals must be established before the commencement of the operational phase. The first of these terminals must be established at the Klipheuwel area, preferably close to its southeastern boundary. The second must be positioned within the Greenville Garden City residential development site in line with the new runway 01/19, and the third on the eastern side of the Bella Riva development site. The resultant noise monitoring results must be reported on a quarterly basis to the appropriate authorities as well as this Directorate and must include, but not be limited to, the following:
 - 45.4.1. 24-hour equivalent continuous A-weighted sound pressure level, LAeq,T;
 - 45.4.2. equivalent continuous day-night rating level, LRdn;
 - 45.4.3. equivalent continuous day and night rating levels, LRd and LRn;
 - 45.4.4. maximum A-weighted level, LAmax;
 - 45.4.5. percentile levels Ln;
 - 45.4.6. number of exceedances above 70 dB(A) and 60 dB(A) of the LAmax and SEL; and

45.4.7. complaints and relevant aircraft-related operational data.

46. A Noise Mitigation and Management Plan ("NMMP"), with measurable goals to prevent and intricately manage noise emissions from the operational phase of the development must be compiled and implemented. The NMMP that incorporates comments from all relevant authorities, including this Department's Air Quality Management Directorate, the City of Cape Town and the SACAA must be submitted to this Directorate together with all comments obtained, prior to the commencement of any earthmoving or construction activities.
47. A Service Infrastructure Management Plan must be compiled to, *inter alia*, stipulate the frequency by which service infrastructure will be serviced. These include the sewer- and water treatment plants, bio-digester and sewer conveyance infrastructure. The Service Infrastructure Management Plan must be implemented and must be submitted to this Directorate prior to the commencement of earthmoving- and construction activities.
48. Copies of the following instruments, as approved by the relevant Competent Authorities, must be submitted to this Directorate for record purposes:
 - 48.1. RNP approach procedures;
 - 48.2. Instrument Landing System approach procedures;
 - 48.3. RNAV Standard Instrument Departures; and
 - 48.4. RNAV Standard Instrument Arrivals (standard terminal arrival routes).
49. The following measures adapted from the Socio-Economic Impact Assessment Report (dated 30 May 2025 and compiled by Dr. Jonathan Bloom), must be implemented:
 - 49.1. A Procurement Strategy must be compiled and must be implemented. The Procurement Strategy must be submitted to this Directorate prior to the commencement of earthmoving- and construction activities.
 - 49.2. A Communication Strategy must be compiled and must be implemented. The Communication Strategy must be submitted to this Directorate prior to the commencement of earthmoving- and construction activities.
 - 49.3. A Social Engagement Plan, formal monitoring systems and contingency plans to deal with any larger-than-expected in-migration must be prepared by a suitably qualified person to assist with the management of jobseekers and community business forums and must be implemented. The Social Engagement Plan must be submitted to this Directorate prior to the commencement of earthmoving- and construction activities.
 - 49.4. A lighting audit must be conducted by the appointed ECO at the end of the construction phase of each precinct (excluding the Agricultural Precinct) to ensure that all lighting-related mitigation measures are adhered to and successfully implemented. A copy of the lighting audit report must be submitted to this Directorate.

F. RECOMMENDATIONS

1. The holder of the Environmental Authorisation should, within six (6) months from the date of issue of this Environmental Authorisation, initiate consultation with the CapeNature Advisory Panel to ensure that the Biodiversity Offset Site is transferred into stewardship through a formal Stewardship Agreement with CapeNature after the conclusion of the 30-year management period of the biodiversity offset site.

2. The holder should thereafter provide this Directorate with a status report every six (6) months until the Stewardship Agreement or contract has been finalised.
3. The holder should submit the final Stewardship Agreement or contract to this Directorate within thirty (30) days after it has been finalised, for record purposes.

G. GENERAL MATTERS

1. Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the Listed Activities.
2. Non-compliance with any Condition of this Environmental Authorisation or any provision of the EMPr may render the holder liable for criminal prosecution.
3. If the holder does not commence with the Listed Activities within the period referred to in Condition 2, this Environmental Authorisation shall lapse. If the holder wishes to extend the validity period of the Environmental Authorisation, an application for amendment in this regard must be lodged with the Competent Authority prior to the expiry date.
4. An application for amendment of the Environmental Authorisation must be submitted to the Competent Authority where any detail with respect to the Environmental Authorisation must be amended, added, substituted, corrected, removed or updated. If a new holder is proposed, an application for Amendment in terms of Part 1 of the EIA Regulations, 2014 (as amended), must be submitted.
5. Please note that an amendment of the Environmental Authorisation is not required for a change in the contact details of the holder. In such a case, the Competent Authority must only be notified of such changes.
6. The manner and frequency for updating the EMPr must be made in accordance with Regulations 35 to 37 of GN No. R.982 (as amended) or any relevant legislation that may be applicable at the time.

H. APPEALS

Appeals must comply the National Appeal Regulations, 2025 (Government Notice No. R. 5985 in Government Gazette No. 52269 of 13 March 2025). Please note the provisions of Regulations 1 (2) and (3) of the National Appeal Regulations, 2025 when calculating the period of days.

1. The holder (applicant) of this decision must submit an appeal to the Appeal Administrator, any registered I&APs and the decision maker (Competent Authority who issued the decision) within twenty (20) calendar days from the date this Decision was sent by the decision maker.
2. The I&APs (not the holder of this Decision) must submit an appeal to the Appeal Administrator, the holder (applicant) of the Decision and the decision maker within twenty (20) calendar days from the date this Decision was sent to the registered I&APs by the holder (applicant) of the decision.
3. All appeals submitted must:
 - a. be in writing in the appeal form obtainable from the Departmental website;
 - b. include supporting documents referred to in the appeal; and
 - c. include proof of payment of the prescribed non-refundable appeal fee, if prescribed.
4. The holder (applicant) of the decision must:
 - a. notify registered I&APs and affected organs of state of any appeal received, and make the appeal available to them, within five (5) calendar days after the 20-day appeal period ends.

- b. Submit proof of this notification to the Appeal Administrator within five (5) calendar days after sending the last notification.
5. The applicant, where applicable, the decision-maker, or any person notified under Regulation 4 of the National Appeal Regulations, 2025 may submit a Responding Statement within twenty (20) calendar days from the date they received the appeal, in the form obtainable from the Department website to the Appeal Administrator and to the appellant, where the appellant is not the applicant.
6. Appeals, Responding Statements and supporting documents must be submitted to the Appeal Administrator by means of one of the following methods:
 - a. By e-mail:
DEADP.Appeals@westerncape.gov.za or
 - b. By hand where that person submitting does not hold an electronic mail account:
Attention: Mr Marius Venter
Room 809, 8th Floor Utilitas Building,
1 Dorp Street, Cape Town, 8001

Note: You are also requested to submit an electronic copy (Microsoft Word format) of the appeal, responding statement and any supporting documents to the Appeal Administrator via email or to the address listed above.

A prescribed appeal form, responding statement form as well as assistance regarding the appeal processes is obtainable from the relevant website of the Appeal Authority: <http://www.westerncape.gov.za/eadp> or the office of the Minister at: Tel.: (021) 483 3721 or email: DEADP.Appeals@westerncape.gov.za

I. DISCLAIMER

The Western Cape Government, the Local Authority, committees or any other public authority or organisation appointed in terms of the conditions of this Environmental Authorisation shall not be responsible for any damages or losses suffered by the holder, developer or his successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.

Your interest in the future of our environment is greatly appreciated.

Yours faithfully

Zaahir Toefy Digitally signed by Zaahir Toefy
Date: 2025.10.27 21:21:19
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MR. ZAAHIR TOEFY
DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)
WESTERN CAPE GOVERNMENT: ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

DATE OF DECISION: 27 OCTOBER 2025

Copied to:

- (1) Ms. Amanda Fritz-Whyte (PHS Consulting)
- (2) Mr. Paul Slabbert (PHS Consulting)
- (3) Ms. Sonja Warnich-Stemmet (City of Cape Town)

E-mail: amanda@phsconsulting.co.za

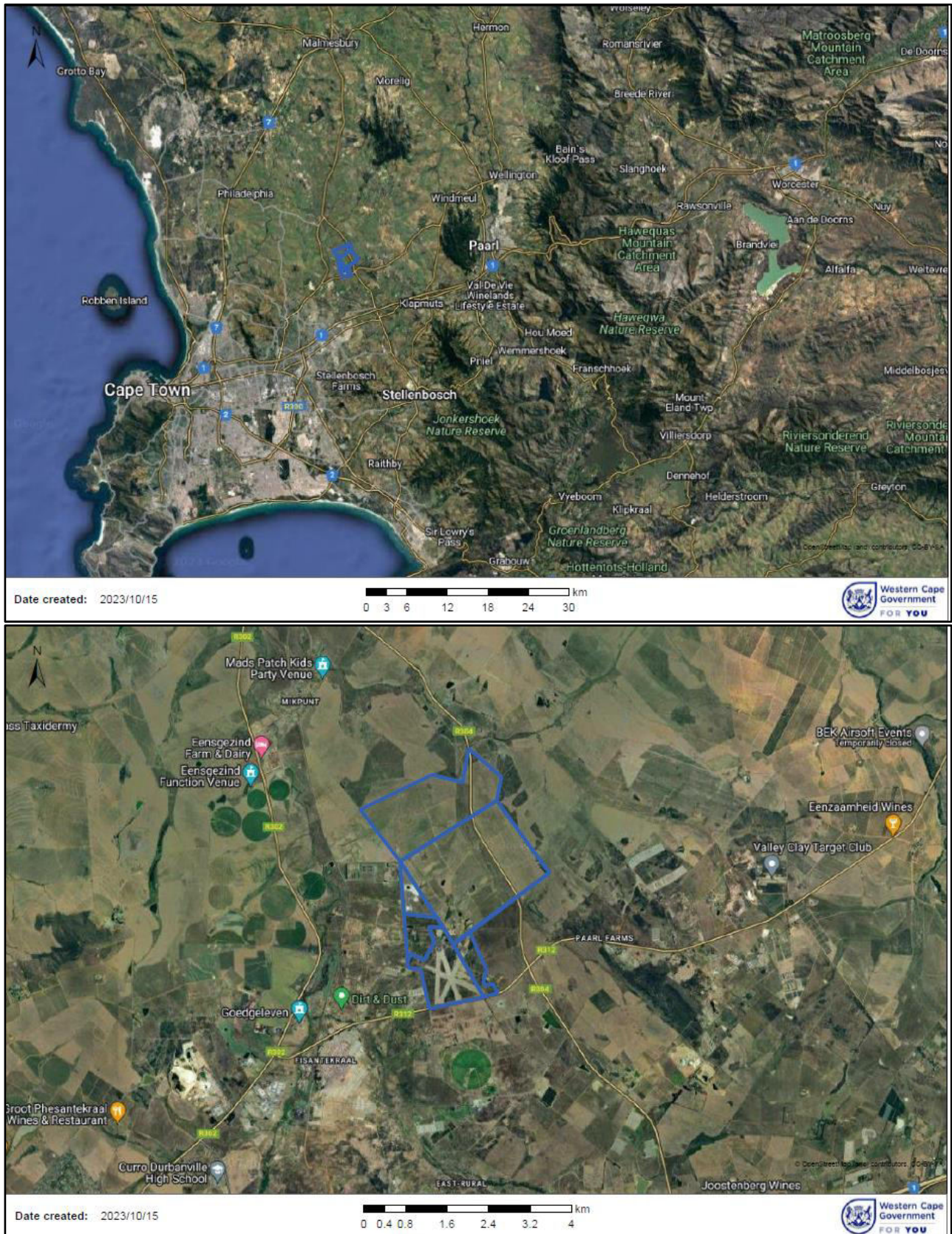
E-mail: paul@phsconsulting.co.za

E-mail: sonja.warnichstemmet@capetown.gov.za

FOR OFFICIAL USE ONLY:

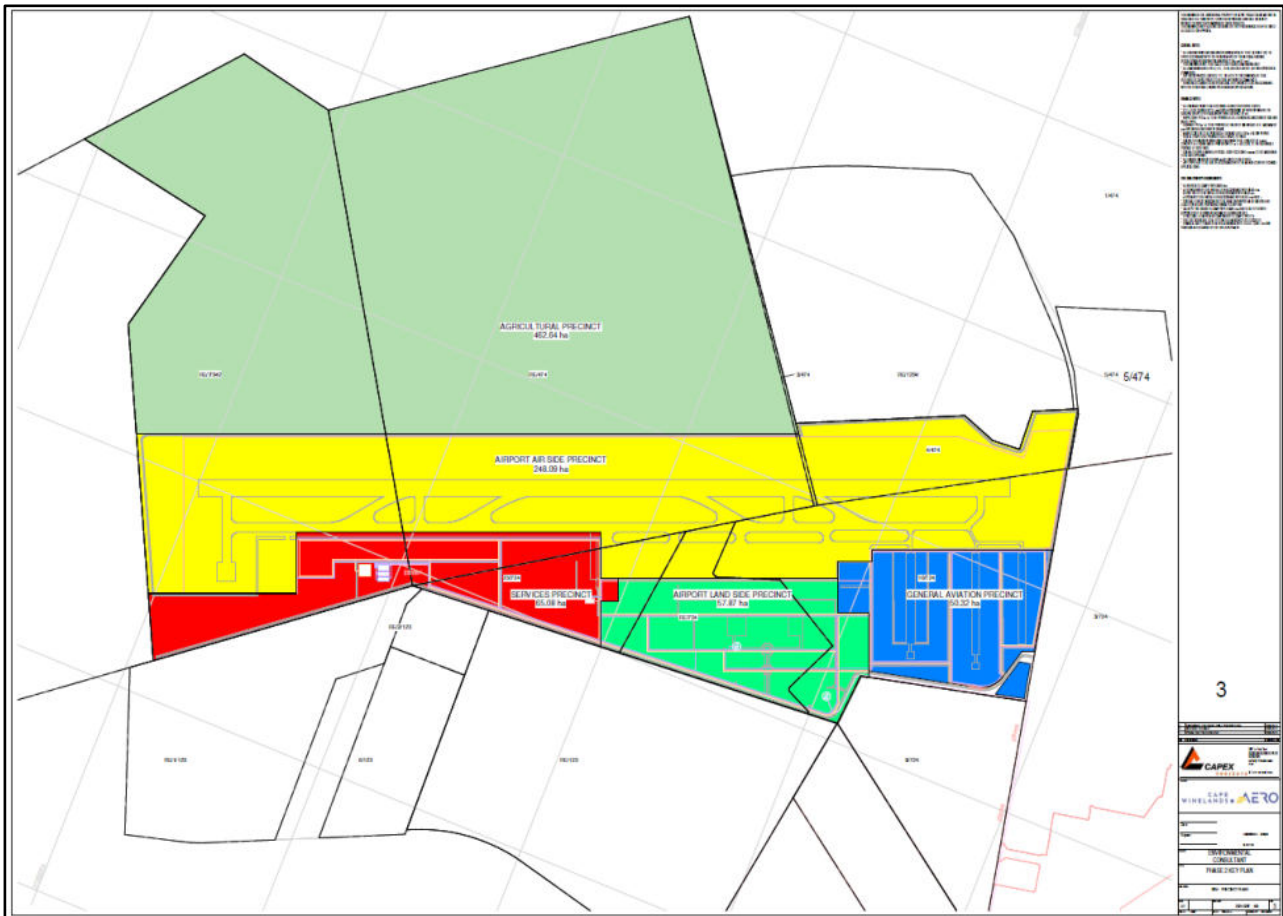
EIA REFERENCE: 16/3/3/2/A5/20/2046/24
NEAS REFERENCE: WCP/EIA/0001497/2024

ANNEXURE 1: LOCALITY MAPS

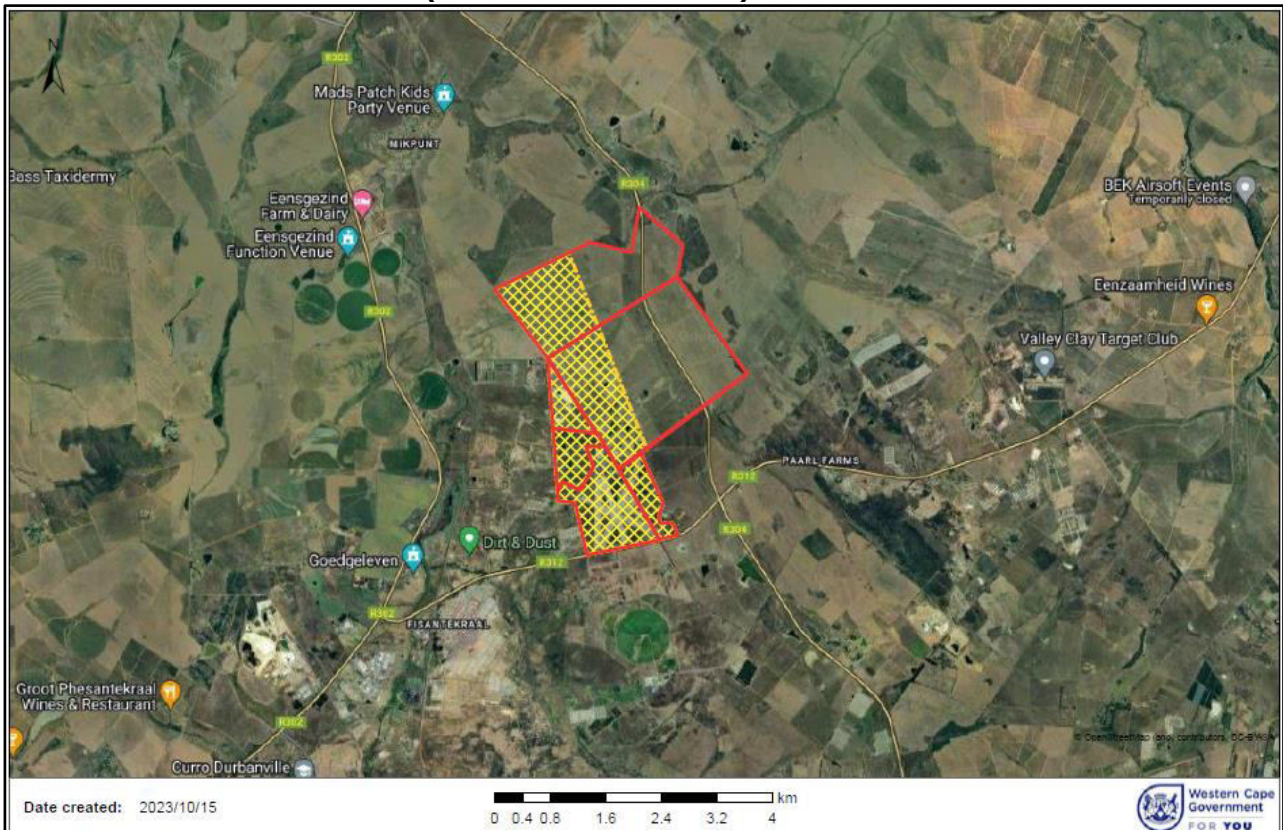


ANNEXURE 2: THE SPATIAL PLANS

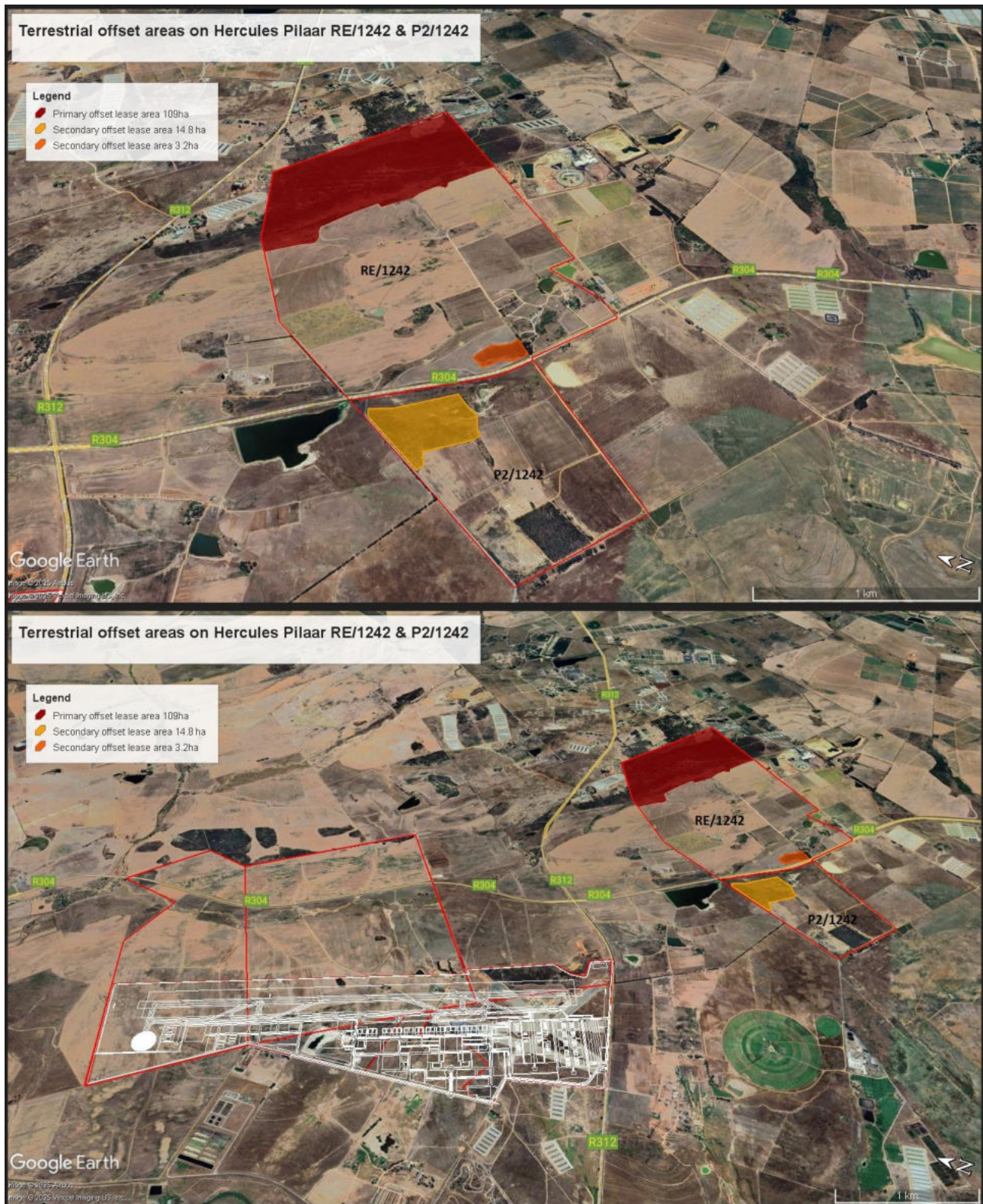
THE PRECINCT PLAN



THE DEVELOPMENT AREA LAYOUT (HATCHED YELLOW AREA)



ANNEXURE 3: Biodiversity Offset Maps



ANNEXURE 4: REASONS FOR THE DECISION

In reaching its decision, the Competent Authority considered, *inter alia*, the following:

- a) The information contained in the Application Form received by this Directorate via electronic on 23 July 2024, the final Scoping Report and Plan of Study received by this Directorate on 6 September 2024, the final EIA Report received by this Directorate on 11 July 2025, the EMP (dated July 2025) and all supporting information.
- b) Relevant information contained in the Departmental information base, including the Guidelines on Public Participation, Need and Desirability and Alternatives (dated March 2013);
- c) The objectives and requirements of relevant legislation, policies and guidelines, including section 2 of the NEMA;
- d) The comments received from I&APs and the responses thereto, included in the final BAR; and
- e) The balancing of negative and positive impacts and proposed mitigation measures.
- f) A site visit was conducted by Mr. Zaahir Toefy (Competent Authority), Officials of the Directorate: Development Management (Region 1) Ms. Natasha Bieding and Ms. Shameemah Heugh, Mr. Deon Cloete (Capewineland Aero (Pty) Ltd), Ms. Adele Klingenberg (existing CWA) and Mr. Paul Slabbert and Ms. Amanda Fritz-Whyte (PHS Consulting) on 22 October 2025.

All information presented to the Competent Authority was taken into account in the consideration of the application for Environmental Authorisation. A summary of the issues that were considered to be the most significant for the decision is set out below.

1. Public Participation

The Public Participation Process ("PPP") included the following:

Pre-Application Phase

- Notification letters were sent to neighbouring landowners via email on 7 November 2023;
- Surrounding (adjacent) landowners, key I&APs and authorities were notified and engaged during the PPP via email on 7 November 2023;
- Landowners were asked to notify their tenants of the proposal and the commenting period on 7 November 2023 (via letter attached to email);
- The relevant Ward Councillors were consulted on 7 November 2023 (via email) and remained registered on the database of I&APs;
- Written notifications sent via email to the Municipal Ward Councillors on 7 November 2023;
- A public meeting was held on 8 May 2024 at the Fisantekraal Community Hall;
- The project team, including the EAP, attended a meeting with the Durbanville Farmers Association on 4 June 2024 during which the EAP was requested to present on the proposed development;
- English and isiXhosa advertisements were placed in the 'Tygerburger' Newspaper (Durbanville) on 8 November 2023;
- An Afrikaans advertisement was placed in 'Die Burger' Newspaper on 8 November 2023;
- An English advertisement was placed in 'The Cape Times' Newspaper on 8 November 2023;
- Three notices in English, Afrikaans and isiXhosa were placed at three locations on or near the site on 8 November 2023;
- The pre-application Scoping Report and supporting documentation was made available for a minimum commenting period of thirty (30) days from 8 November 2023 to 8 December 2023. All late I&AP registration and comments were accepted and incorporated in the I&AP register and included in the Comments and Responses Report;
- A hard copy of the Scoping Report was placed at the Fisantekraal Public Library for public viewing on 8 November 2023;
- A site notice was pinned on the Fisantekraal Public Library notice board on 8 November 2023; and
- A public meeting was held on 8 May 2024 in Fisantekraal.

Matters raised in the comments received during the abovementioned PPP include the following:

- The site requires a closure certificate regarding the existing quarry;
- Requests to be registered as I&APs;
- Objections against the development proposal;
- Traffic congestion and infrastructure constraints due to the proposed airport expansion;
- Noise pollution;
- Impacts of air quality and emissions;
- Impacts on the ecology of wetlands must be considered;
- Negative impacts on the Garden Cities Development;
- Liaising with the relevant and Competent Authorities;
- Associated impacts on the Cape Town International Airport ("CTIA") from an aviation and sustainability perspective;
- Light pollution;
- Air pollution;
- Noise pollution;
- The applicability of municipal forward planning policies;
- The municipal bulk services and other associated infrastructure requirements;
- Further considerations required in terms of the biodiversity related impacts;
- The need for community meetings and engagements;
- Support of the proposed development;
- Impacts on the local and surrounding residents and receiving environment; and
- The need for robust assessments by accredited persons.

Draft Scoping Application Phase

- Copies of the draft Scoping Report were made available for a minimum commenting period of thirty (30) days from 24 July 2024 to 26 August 2024;
- Registered I&APs and commenting authorities were notified of the availability of the draft Scoping Report on 23 July 2024;
- Focus group meetings were held on 16 August 2024 (Fisantekraal community leaders), 17 August 2024 (Durbanville Heritage Society) and 22 August 2024 (CoCT Noise and Air Quality), respectively;
- A hard copy of the draft Scoping Report was placed at the Fisantekraal Public Library on 23 July 2024;
- A site notice was pinned on the Fisantekraal Public Library notice board on 23 July 2024;
- An advertisement in English in the 'Tygerburger' Newspaper on 24 July 2024; and
- Three site notices in English, Afrikaans and isiXhosa were placed at three locations on or near the site on 23 July 2024.

Matters raised in the comments received during the abovementioned PPP include the following:

- Extension requested on the deadline for providing comment on the Scoping Report;
- Need and viability of a second commercial international airport;
- Security of fuel supply for the CWA expansion;
- The CWA expansion not having been considered in terms of government policy(s);
- Airspace design requirements;
- The impact of CWA expansion on the future development of the CTIA;
- Inadequacies of the Concept of Operations Study;
- A more detailed study regarding the CTIA versus CWA expansion airspace is required;
- Impacts on the operations of the 'Westelike Provinsie Oesbespuiting Maatskappy';
- Requests to be registered as an I&AP;
- Traffic impacts on the local roads;
- Noise pollution;
- Civil Aviation Regulations with respect to bird/wildlife strike prevention programme and other applicable requirements to be met;
- Objections to the proposal;
- Impacts on existing aviation facilities in Stellenbosch;
- Noise impact, including noise contours;
- Impacts on airspace and inadequacies in the Airspace Conops Report;
- Impacts of noise, pollution, congestion and crime on Mikipunt resident(s);
- Accreditation of specialists;
- Impacts on rural living;

- Impacts on wildlife;
- Insufficiency of certain specialists studies;
- Negative impacts on the local residents;
- Transparency in public participation required;
- Concerns and impacts on the County Fair poultry farm;
- Need for an alternative location;
- Impacts on the Bella Riva development;
- Aquatic related impacts;
- The relevance of the strategic and Municipal context of the receiving area;
- Impacts on the surrounding areas;
- Impact on communications infrastructure (masts); and
- General support and requests to form partnerships with the expanded airport.

Draft EIA Phase

- Copies of the draft EIA Report were made available for minimum commenting period of thirty (30) days from 13 November 2024 to 13 December 2024;
- An extension on the above comment period was granted until 13 January 2025;
- A public open day was held on 20 November 2024;
- Registered I&APs and commenting authorities were notified of the availability of the draft EIA Report on 13 November 2024;
- An advertisement in English was placed in the 'Tygerburger' Newspaper on 13 November 2024;
- Three site notices in English, Afrikaans and isiXhosa were placed at three locations on or near the site on 13 November 2024;
- A hard copy of the draft EIAR was placed at the Fisantekraal Public Library on 13 November 2024; and
- A site notice was pinned on the Fisantekraal Public Library notice board on 13 November 2024.

Matters raised in the comments received during the abovementioned PPP include the following:

- What the flight paths for landings and departures will be;
- Noise impacts and pollution;
- Increased fire risks;
- Impact on existing farming practices and areas;
- Increased air traffic over local properties;
- Objections against the development proposal;
- Air quality emissions at the CTIA that can be incorporated into the Air Quality Impact Assessment and modelling;
- Assessment of individual case studies regarding existing airports;
- Support for the development proposal;
- Inadequate time to provide comments and have public participation processes underway;
- The transport and traffic related requirements to be adhered to;
- Impact on property values;
- Request for extension of the PPP;
- Impacts on the existing Greenville residential development;
- Impacts on the local area's poultry operations;
- Desirability of the CWA expansion in the context of existing local aviation sector raised by the Airports Company South Africa; and
- Safety and security resulting from the CWA expansion.

Revised draft EIA Phase

- Copies of the revised draft EIA Report were made available for a longer commenting period of 45 days from 19 March 2025 to 13 May 2025;
- Registered I&APs and commenting authorities were notified of the availability of the draft EIA Report on 19 March 2025;
- English and isiXhosa advertisements were placed in both the Durbanville and the Kraaifontein editions of the 'Tygerburger' Newspaper on 19 March 2025;
- An Afrikaans advertisement was placed in the 'Die Burger' Newspaper on 19 March 2025;

- Three site notices in English, Afrikaans and isiXhosa were placed at three locations on or near the site on 18 March 2025;
- A hard copy of the amended EIA Report was placed at the Fisantekraal Public Library on 19 March 2025;
- A site notice was pinned on the Fisantekraal Public Library notice board on 19 March 2025;
- A second public open day was held on 15 April 2025 at the Goedgeleeven Venue, Klipheuwel Road, Durbanville ;
- The CWA expansion project team participated in the Paardeberg Sustainability Initiative's Farmer's Day on 20 March 2025 where they delivered a presentation followed by a Question and Answer session; and
- A focus group meeting was held on 15 April 2025 with an I&AP who operates a parrot sanctuary in Mikpunt.

Matters raised in the comments received during the abovementioned PPP include the following:

- Potential negative impacts on the local area, including Durbanville and Fisantekraal;
- Support for the proposal;
- How the local road network will be affected;
- Traffic impacts;
- Noise impacts;
- Air pollution;
- Impacts on local agricultural areas and operations;
- Further requirements must be met in terms of the landuse applications and air emissions licence;
- The impacts on the County Fair poultry farm property due to operations of the development proposal;
- Need and desirability of development proposal;
- Inadequacy of alternatives considered;
- Specific biodiversity offset requirements;
- Objection against the development proposal; and
- Impacts on the CTIA by the CWA expansion, as proposed second airport in Cape Town.

Proof of having responded to all of the abovementioned matters raised, including objections, have been included in the Comments and Response Report that was submitted together with the final EIA Report. In certain instances, the abovementioned matters raised resulted in either adjustments being made to the development proposal or additional studies being commissioned and the recommendations thereof incorporated into the development proposal and included in subsequent reports that were circulated for further comments.

Additionally, consideration was given to comments and feedback that was received after the conclusion of the abovementioned commenting periods.

On 16 July 2025, an email notification was sent to all registered I&APs, stakeholders and authorities to inform them of the fact that the final EIA Report and supporting documentation was submitted to the Competent Authority.

Additional PPP related measures included the following:

- A hard copy of the final EIA Report and supporting documentation was placed at the Fisantekraal Public Library on 16 July 2025;
- A site notice was pinned on the Fisantekraal Public Library notice board on 16 July 2025;
- On 4 August 2025, updated information was placed on the PHS Consulting Website as well as placed at the Fisantekraal Public Library; and
- On 10 September 2025, a document on the late comments received (addendum to Appendix 29D) was posted on the PHS Consulting Website, and a hard copy was placed at the Fisantekraal Public Library on 12 September 2025.

Matters raised after the final EIA Report was submitted to the Competent Authority include the following:

- Further clarification regarding the local airspace impacts;
- Where previous objections against the proposal can be viewed;

- The proposed flight path and options for air traffic arriving and departing the expanded airport;
- Impacts of flight paths on the Paardeberg Conservancy;
- Support for the development proposal; and
- How the site will be powered (electricity).

The EAP provided proof of having noted and acknowledged the abovementioned matters raised, even if such matters were raised after the legislated PPP commenting period ended. In this regard that EAP also further confirmed that the expanded airport's will not directly impact the Paardeberg Conservancy.

Relevant State Departments and Organs of State consulted during the abovementioned PPPs include the following:

- CapeNature;
- City of Cape Town;
- Heritage Western Cape;
- West Coast District Municipality;
- Western Cape Government: Mobility;
- Western Cape Government: Agriculture;
- Western Cape Government: Infrastructure;
- Western Cape Government: Environmental Affairs and Development Planning (various Directorates);
- National Department of Water and Sanitation;
- National Department of Mineral Resources and Energy; and
- National Department of Agriculture, Land Reform and Rural Development.

Furthermore, the following Stakeholders have been invited to participate during one or more of the abovementioned PPPs:

- Eskom;
- Transnet;
- Paardeberg Conservancy;
- Birdlife South Africa; and
- The Passenger Rail Agency of South Africa.

It should be further noted that whilst the proposed development falls within the City of Cape Town municipal boundary, municipalities from outside the City of Cape Town municipal boundary were also invited to provide inputs and comments during the abovementioned PPPs. These municipalities are the Drakenstein Municipality, Stellenbosch Municipality, Swartland Municipality and Cape Winelands Municipality. No objections nor substantive comments were provided from the said Municipalities.

All responses submitted after the abovementioned PPPs concluded were made available to the Competent Authority and included in the Comments and Responses Reports.

The Directorate is satisfied that the PPP that was followed met the minimum legal requirements. In addition to the minimum PPP requirements having been met, is further noted that various stakeholder engagements, a public open day and focus group meetings were hosted during the scoping and EIA application process as well as extensions granted during specific PPPs in response to extension requests received from I&APs.

Specific management and mitigation measures have been considered in this Environmental Authorisation and in the provisions of the EMPr to address any significant concerns raised.

2. Alternatives

Scoping Phase:

Early during the scoping phase of the application process, three Alternatives were identified and considered, *namely*; (a) one Location Alternative (*i.e.*, the expansion of the existing CWA), (b)

the 'No-Go' Alternative (*i.e.*, no expansion of the existing CWA), and (c) the Preferred Alternative (*i.e.*, the expansion of the existing CWA), were considered.

Only the 'No-Go' Alternative and the Preferred Alternative were further assessed during the EIA phase of the application process. Based on the assessment of impacts during the EIA phase, additional changes were made to the Preferred Alternative. These changes include, *inter alia*, the following:

- (a) The removal of the cross runway;
- (b) Exclusion of the chicken manure to the biodigester;
- (c) Exclusion of the wind energy options;
- (d) Inclusion of both sewer to on-site treatment as well as servicing via the Fisantekraal WWTW;
- (e) Inclusion of additional boreholes to be drilled;
- (f) Inclusion of an incoming potable line from the southwest;
- (g) Extension of the fuel line into the General Aviation Precinct area; and
- (h) Minor amendments to internal precinct boundaries.

These changes resulted in a new Preferred Alternative 4 (discussed below, as Alternative 2), which was further assessed during the EIA phase.

The reasons for only assessing one Location Alternative is based on the following reasons:

- Land availability, shape and size (the necessary land has been secured);
- The consideration of technical and operational requirements, *inter alia*, suitable terrain, absence of geographical obstructions, suitable meteorological conditions, it being possible to integrate with existing air traffic patterns, and the presence of adequate geotechnical requirements for runway construction;
- Connectivity, *i.e.*, good proximity to major roads and rail infrastructure, accessibility and proximity to urban centres;
- Regulatory and legal considerations, *namely*; existing zoning for the use of the site for airport operations and aviation policy whereby the proposed airport will financially be self-sustaining and privately funded;
- The applicable environmental and ecological factors, *inter alia*, site's positioning to safeguard operations whilst minimising noise-related disruptions, proper site drainage due to the elevated ridge present, presence of boreholes for water supply and easy integration into municipal service infrastructure network, the site's location outside of the exclusion zoned, including the Koeberg Nuclear Power Station zones; and
- Economic and financial considerations, *namely*; lower development costs will ensue when compared to developing a greenfield site and the potential to serve as a cost-efficient alternate airport option in terms of diversion planning and fuel contingencies.

The 'No-Go' Alternative, *i.e.*, no expansion of the existing CWA, has been considered during the scoping phase.

EIA Phase:

During the EIA phase, Alternative 1 (the 'No-Go' Alternative), Alternative 2 (the phased expansion of the CWA, which omits a short crosswind runway and includes further adjustments made, including *inter alia*, (1) the fuel line extending into the General Aviation Precinct, (2) amending the internal precinct boundaries, (3) the usage of 3 boreholes, and (4) the installation of an incoming potable line), and Design/Technology Alternatives were assessed.

Alternative 1 (Rejected)

The 'No-Go' Alternative entails no expansion of the existing CWA 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 taking place. This means that the 'status quo' is maintained, *i.e.*, the current aviation activity at the airport consisting of flight school operations and other unscheduled general aviation flights will continue.

The Alternative 1 ('No-go' Alternative) was rejected, since it will mean that the site will not be able to fulfil its identified strategic roles within the City of Cape Town's air travel market in terms of the following:

- The City of Cape Town's second commercial airport offering scheduled airline services for domestic and international passenger and cargo operations;
- Alternate Airport for diversion and fuel planning purposes, enabling significant efficiencies for the airline sector;
- General Aviation Airport for domestic and international, unscheduled, and private operations;
- Reliever Airport, adding redundancy and diversion capability for aircraft in the region;
- Logistics Hub catalysing multi-modal commercial activity in the region and stimulating economic growth; and
- Commercial Property Developments stimulated and enabled by the above.

Alternative 2 (Preferred and Herewith Authorised)

Alternative 2 entails the expansion of the existing CWA, comprising of the development of five precincts, one of which will be the Agricultural Precinct. The remaining four precincts, *namely*; the Services Precinct, the Airside Precinct, the Terminal Precinct, and the General Aviation Precinct, will be developed in two distinct phases. After the implementation of Phase 1 stipulated below, Phase 2 will evolve in response to market demand.

Phase 1:

- An Agricultural Precinct, measuring approximately 462ha in extent, comprises the continuation of the existing agricultural component. This Precinct includes the construction of the following:
 - existing main access roads and internal farm roads left unchanged;
 - areas of intact vegetation respected as 'no-go' areas for conservation;
 - establishment of the required firebreaks;
 - establishment of wetland rehabilitation;
 - establishment of designated wetland offset areas;
 - construction and installation of associated stormwater infrastructure; and
 - fence line on the outer perimeter and a shared security fence line with the Airside precinct.
- A Services Precinct, measuring approximately 65ha, which will include the construction of the following:
 - a maintenance repairs and operational hanger;
 - an aircraft sanitary station;
 - an airport maintenance facility/area;
 - a catering building;
 - a Ground Support Equipment ("GSE") staging and maintenance facility;
 - a Fuel farm;
 - a cargo terminal;
 - an Aircraft Rescue and Firefighting facility;
 - an Operations Centre ("OPS");
 - an Air Traffic Control centre;
 - an Eskom incoming and Substations;
 - a groundwater and potable water treatment facility and storage area;
 - a water pump station;
 - a non-potable treatment facility and storage area;
 - a solid waste area;
 - a firefighting water pump station;
 - areas for airport use; and
 - internal road and services configuration.
- An Airside Precinct, measuring approximately 249ha, which will include the construction of the following:
 - a primary runway of measuring approximately 3.5km in length at an orientation of approximately 01-19 and taxi ways;

- Solar Photovoltaics ("PV") ;
 - airport parking;
 - a maintenance repairs and operations apron;
 - a cargo apron;
 - an Eskom incoming and substation;
 - a Remote Digital Control Tower System;
 - Localizer, Glidepath antennae, and Precision Approach Path Indicator ("PAPI");
 - Runway End Safety Areas ("RESA") areas around the runway and taxi lanes;
 - Landscaping;
 - firebreaks;
 - establishment of conservation areas;
 - establishment of re-vegetated areas; and
 - internal road and services configuration.
- A Terminal Precinct, measuring approximately 57ha, which will include the construction of the following:
 - landscaping;
 - a passenger terminal building;
 - a car rental and public transport;
 - parking, pick up and drop off area
 - GSE staging;
 - cargo;
 - an energy centre and aircraft sanitary station;
 - a land side substation ("LSS");
 - a hotel;
 - various areas for airport use;
 - aero vintage;
 - restaurants;
 - a petrol and diesel service station;
 - access roads, internal roads and associated infrastructure; and
 - Internal road and services configuration.
- A General Aviation Precinct, measuring approximately 50ha, which will include the construction of the following:
 - a General Aviation/VIP/Government terminal;
 - parking
 - fixed base operators
 - General Aviation hangars
 - a General Aviation Clubhouse and fueling facility;
 - a special cargo facility;
 - an OPS (Operations Centre);
 - access control areas;
 - areas for airport use;
 - a heliport;
 - internal road and services configuration; and
 - signage and billboards.
- Associated infrastructure and components which will include the construction of the following:
 - a sewage pipeline leading to the Fisantekraal Waste Water Treatment Works ("WWTW");
 - a potable waterline;
 - on-site stormwater infrastructure;
 - an Eskom line;
 - access roads and alignment;
 - Solar PV (on buildings);
 - perimeter fencing; and
 - firebreaks.

Phase 2:

- Continued use of the abovementioned Agricultural Precinct, comprising of the following:
 - areas of intact vegetation for conservation purposes;
 - firebreaks;
 - wetland rehabilitation;
 - wetland offset;
 - existing agricultural areas remaining intact;
 - existing access roads remaining;
 - stormwater infrastructure;
 - a fence line; and
 - a shared security fence line with the Airside precinct.
- Continued use of the abovementioned Services Precinct, which will include the construction of the following:
 - groundwater containment and treatment measures;
 - sewage containment and treatment;
 - containment of treated sewage water (inclusive of emergency storage) and pumpstation;
 - a solid waste area
 - a biodigester (using grass feedstock and treated sewage water);
 - Eskom incoming and LS substation;
 - a firefighting water pump station
 - an Aircraft sanitary station;
 - maintenance, repair, and overhaul ("MRO") hangar;
 - a maintenance area;
 - a parking area;
 - a catering building;
 - GSE maintenance and staging area;
 - a fuel farm and underground fuel line
 - a substation
 - a cargo terminal;
 - Aircraft Rescue and Fire Fighting ("ARFF");
 - an OPS (Operations Centre);
 - an Air Traffic Control Tower
 - an Existing quarry to be used for stormwater retention;
 - internal road and services configuration; and
 - landscaping.
- Continued use of the abovementioned Airside Precinct, which will include the construction of the following:
 - a 3.5km long runway;
 - taxi areas;
 - solar PV;
 - aircraft parking;
 - an MRO apron;
 - a cargo apron;
 - Eskom incoming and substations;
 - a Remote Digital Control Tower System ("RDTS")
 - a PAPI;
 - internal road and services configuration;
 - an underground fuel line;
 - RESA areas around the runway and taxi lanes
 - landscaping;
 - firebreaks;
 - conservation areas; and
 - re-vegetated areas.
- Continued use of the abovementioned Terminal Precinct, which will include the construction of the following:
 - landscaping;

- a passenger terminal building;
 - a car rental and public transport facility;
 - a parking, pick up and drop off facility;
 - pier expansion reservation;
 - a terminal reserve;
 - GSE staging area;
 - Cargo area;
 - an energy centre and aircraft sanitary station;
 - an LS SS (Land Side Substation);
 - two (2) hotels;
 - airport use area;
 - aero vintage;
 - restaurants
 - a service station; and
 - internal road and services configuration.
- Continued use of the abovementioned General Aviation Precinct, which will include the construction of the following:
 - General Aviation/VIP/Government Terminal;
 - parking;
 - fixed base operators;
 - General Aviation Hangers;
 - General Aviation clubhouse and fueling;
 - a special cargo facility;
 - an OPS (Operations Centre);
 - an access control facility;
 - transport use area;
 - airport use, i.e., associated buildings and facilities and uses supplementary to the runway use;
 - heliport;
 - internal road and services configuration; and
 - landscaping.

The total development footprint amounts to approximately 883ha in extent.

It was confirmed in the final EIA Report (dated July 2025) that Alternative 2 (Preferred and Herewith Authorised) has been revised to include additional components based on comments received from I&APs and Organs of State. The additional components include, (1) the extension of the fuel line into the General Aviation Precinct, (2) the amendment to the boundaries of the Internal Precinct, (3) the provision of three (3) boreholes, (4) the addition of an incoming potable line, and (5) the omission of the short cross-runway initially proposed.

Technology Alternative related to Energy – Solar and Biodigester versus Eskom Supply

The Biodigester Plant comprises of the feed stream using treated effluent from the new WWTW, cultivated biomass/energy crop as well as organic waste from the site. The system will be designed to provide approximately 1 Mega Watt ("MW") of continuous power.

The Solar PV installation will generate more than 20MW but less than 100MW of renewable energy. The Solar PV installed power sources will be integrated onto the site micro-grid electrical infrastructure using the planned medium voltage distribution network.

Bulk electrical supply will be connected to the Eskom Grid via a 66,000-Volt overhead powerline to be undertaken in a phased approach.

The Eskom power supply will provide backup supply on site to the solar/biodigester energy supply, which is the preferred technology alternative and approach, since the use of a Biodigester Plant and Solar PV installation will reduce reliance on Eskom power supply.

Technology Alternative related to Waste Management – Disposal to landfill versus Biodigester

Waste generated from on-site operations will include general and recyclable waste, which will be separated at source. Recyclable waste will be disposed to a local transfer station or by pickup from licensed waste operators.

General and hazardous waste will be disposed to landfill with transfer by road. Waste will be stored on site for a short period before collection and disposal to landfill.

Technology Alternative related to wastewater treatment and management – on site treatment versus disposal into the CoCT sewer network

Various options were considered, including installation of a pumpstation and associated rising main that conveys the flows directly to Fisantekraal WWTW or the construction of an on-site wastewater treatment plant.

The preferred Technology Alternative entails the construction of an on-site package treatment plant to treat wastewater for non-potable water use on the site. The remaining sewage will be directed to the nearby municipal WWTW for further treatment and disposal.

This is the preferred Technology Alternative, since it aims to optimise effluent reuse, reduce pressure on the WWTW, as well as address environmental concerns with respect to excess treated effluent generated.

3. Impact Assessment and Mitigation Measures

3.1 Need and Desirability

The site is located approximately 40km from the City of Cape Town's Central Business District with linkages to areas located within the neighbouring Municipalities, *i.e.*, Drakenstein Municipality, (Wellington and Paarl), Swartland Municipality (Malmesbury), and Stellenbosch Municipality. The site is therefore well positioned, since it enables future connectivity and new tourism nodes within the broader region. The newly expanded CWA is projected to be 'multifaceted' in that it will provide a number of services within the aviation sector and stimulate associated spinoff industries.

Services within the aviation sector that will be provided include the following:

- Scheduled Airline Services for domestic and international passenger- and cargo operations;
- General Aviation for domestic and international, unscheduled, and private operations;
- Alternate Airport for fuel planning purposes and environmental savings;
- Reliever Airport, adding redundancy and diversion capability for aircraft in the region;
- Logistics Hub catalysing multi-modal commercial activity in the region and stimulating economic growth; and
- Commercial Property Developments stimulated and enabled by the above.

Beneficial spinoffs include the provision of employment opportunities during both the construction- and operational phases. Associated industries and commercial activities that will be stimulated by the development proposal include, *inter alia*, fixed based operations, private charter, recreational flying, flight training, helicopter, fire and rescue, aircraft MRO, aircraft assembly and manufacture, hotel, conferencing and events, retail, food and beverage, warehousing, logistics and freight.

The site's location will help enable the newly expanded CWA to serve as a multi-modal transport hub due to road, rail, and air connectivity, with the aims of fulfilling several key roles within the aviation sector. These include unlocking new markets whilst enhancing existing ones, and creating further opportunities within the sector, thereby improving the

socio-economic landscape within the region. The expansion of existing CWA into a commercial airport will ultimately assist Cape Town to become a 'Multi-Airport City', enabling new growth opportunities and improving the attractiveness and competitiveness of the region.

The close proximity and connectivity of the site to existing road- and rail networks will allow the expanded CWA to form a synergy between air, road, and rail networks and thereby support a multi-modal approach to transportation. This demonstrates the desirability of the development proposal from a transportation perspective.

The timing of having the existing CWA expanded is adequate in the sense that it will lead to meaningful contribution to the region's economy and accelerate economic growth, attract investment, boost tourism, and improve logistics in the short- and long term. Having a second airport offers a competitive edge, whereby diversified aviation infrastructure caters to multiple aviation needs whilst helping to alleviate capacity constraints and mitigate risks associated with flight diversions and delays that may be experienced by the existing CTIA. Expanding the existing CWA is more time-efficient and cost-effective than building a new airport.

Due to the location of the site, nearby communities such as Fisantekraal and Klipheuwel, which house large numbers of previously disadvantaged persons, will benefit from improved access to an increased diversity of job opportunities and skills acquisition during the construction- and operational phases, thereby reducing their spatial dislocation on the outskirts of the city.

3.2 Regional and Local Planning

The existing airport site, previously known as Fisantekraal Airfield, is zoned Transport I with consent for an airport. The extent of the expanded CWA that falls outside of the existing airport site is zoned Agriculture. The relevant planning approval will be required to appropriately rezone the site in terms of the relevant planning legislation in order to permit the development proposal.

The expanded CWA site is currently zoned, as follows:

Property	Zoning
Portion 10 of the Farm No. 724, Fisantekraal	Transport Zoning I with consent for "Airport"
Remaining Extent of the Farm No. 724, Fisantekraal	Agriculture
Portion 23 of the Farm No. 724, Fisantekraal	Agriculture
Portion 7 of the Farm No. 942, Fisantekraal	Agriculture
Remaining Extent of the Farm No. 474, Fisantekraal	Agriculture
Portion 3 of the Farm No. 474, Fisantekraal	Agriculture
Portion 4 of the Farm No. 474, Fisantekraal	Transport Zoning I with consent for "Airport"

Specific land parcels will retain their designated 'Agriculture' zoning, including its associated farming activities. These land parcels comprise of the Agricultural Precinct, reflected in Annexure 2 above.

The site falls partially outside of the City of Cape Town's Proclaimed Urban Development Edge. In this regard, it could be argued that this is due to the nature and scale of this type of land use, which requires large expanses of land that is usually situated in rural areas or near the outskirts of a city with the least impact on existing urban land uses. This approach is consistent with the Western Cape Land Use Planning Guidelines - Rural Areas (2019), which states that bulk infrastructure installations serve both urban- and rural communities. In the airport context, airports are often located outside existing Urban Areas because of their need for extensive space, unique locational requirements, or potential negative impact on surrounding areas. In this sense, the approach to infrastructure installations in rural areas is to ensure that these essential public installations can function effectively in suitable rural locations.

Since the development proposal represents a private investment to establish a new economic and transport hub, it will contribute to creating and attracting investment that will facilitate economic growth and employment opportunities. The development proposal is therefore broadly consistent with specific spatial strategies, as included in the City of Cape Town's Spatial Development Framework, 2023 ("Municipal SDF"). Deviations from the Municipal SDF are required for, *inter alia*, (a) the proposed runway, the runway safety area and parts of the landside development extending beyond the Urban Development Edge, (b) portions of the site located in 'Areas of Agricultural Significance' and 'Discouraged Growth Areas', and (c) the southeastern portion of site that is located within a designated 'Core Biodiversity Area'. The application to deviate from the Municipal SDF will form part of the landuse application. Further site-specific circumstances for deviation from the Municipal SDF will have to be motivated in terms of the Municipal Planning By-law. The expanded CWA will necessitate amendments to the City of Cape Town Northern District Plan, 2023 and Urban Development Edge in order to permit the development proposal.

The expanded CWA is deemed to be consistent with the Western Cape Provincial Spatial Development Framework, 2014 ("Provincial SDF"), since the development proposal will contribute toward leveraging private sector investment for regional infrastructure, strengthen the Cape Metro economy and drive economic growth and employment. Furthermore, the development proposal will promote urban revitalisation by optimising existing assets, and advance spatial efficiency by promoting economic activity both locally and regionally. Given the nature of the development proposal, inter- and intraregional accessibility will be improved by its air connectivity options to the metro and wider areas.

The overarching policy thrust of the Provincial SDF is to ensure that all major infrastructure investments are aligned with developmental objectives that promote economic growth, sustainability, and social- and spatial justice. Within this context, the expansion of the existing airport can be regarded as a strategic enhancement of regional connectivity, positioned to strengthen the metropolitan transport system. By improving access and logistics capacity in a part of the metropolitan nexus experiencing rapid population growth and urban expansion, the development proposal holds potential to unlock new economic opportunities, support more inclusive patterns of growth, and diversify transport options for the region.

Further to relevant provincial considerations, the draft Provincial Land Transport Framework (2024/25–2028/29) explicitly recognises the expanded CWA, as a strategic initiative. In terms of the Greater Cape Metro Regional Spatial Implementation Framework, 2019 the development proposal directly supports the vision and development concept of the said framework by enhancing regional transport infrastructure and logistics networks.

In terms of the City of Cape Town Integrated Development Plan, 2022-2027 ("Municipal IDP"), the development proposal is consistent with the focus areas of the Municipal IDP, since both indirect and direct investment will be made into the City of Cape Town Metropole. Direct employment will be created for the benefit of the communities in the surrounding areas during both the construction- and operational phases. The development proposal will most notably support the transport sector by delivering additional capacity and unrestricted/uninterrupted air access into the region.

The proposed development is consistent with the focus areas of the City of Cape Town's Inclusive Economic Growth Strategy, 2021 given significant positive economic impacts that it will have, as mentioned below:

- Employment;
- Increased route profitability for existing airlines flying into Cape Town;
- Improved business case for future airlines, considering a new route into Cape Town in the future;
- Increased trade opportunities through the provision of additional air cargo capacity;

- Airport redundancy, ensuring air access into- and from Cape Town (unhindered trade and travel);
- Growth in the Gross Geographic Product ("GGP"); and
- Growth in household income.

3.3 Aquatic: Surface Water

The equally modified Mosselbank River is located 1km west of the site, and the Klapmuts River is located approximately 1.1km north-east of the site.

Two seep wetlands are located within the study area, *namely*; seep wetland 1 located within the central portion of the site and seep wetland 2 located approximately 310m east of the site. Both seep wetlands are both heavily modified, fragmented and comprise of little remaining indigenous vegetation. It is, however, still considered important, as breeding and a foraging habitat for various fauna.

The expanded CWA will ultimately result in the loss of approximately 6.74ha of wetland habitat due to the establishment of the runway over seep wetland 1. Furthermore, stormwater released into seep wetland 1 poses a risk to the ecological functioning of the wetland. As a result, wetland offsetting was warranted to compensate for the residual loss of wetland habitat, ensuring no net loss of wetland functionality. The wetland offset will be implemented in accordance with the requirements put forward by the National DWS. The impact on seep wetland 2 is deemed to be negligible due to its distance from the site and the release of stormwater from the proposed development into the stormwater attenuation ponds prior to its release into the surrounding environment.

Three (3) Channelled Valley Bottom ("CVB") wetlands in a seriously modified state were identified east of the site. Two smaller and heavily modified CVB wetlands (CVB wetlands 2 and 3) serving as breeding habitat were identified and do not encroach onto the site. Only a small portion of the larger CVB wetland 1 associated with the unnamed tributary of the Klapmuts River is located on the site, of which approximately 6.74ha of wetland will be lost, as explained above. Another CVB wetland (CVB wetland 4) was identified north of the site. With the exception of the fences, maintenance road and stormwater released into CVB wetland 3, no significant or long-term modifications are anticipated to the CVB wetlands. The development proposal will remain outside of the recommended 15m conservation buffer of the CVB wetland areas. Various artificial features identified in the central portion of the site, includes a quarry associated with historical open-pit clay mining activities, artificial impoundments connected to the CVB wetland 1, stormwater channels and agricultural drains.

The development proposal was found to pose a 'Low' risk significance to CVB wetlands 2 and 3, which is considered to be acceptable. The construction and operation of the expanded CWA will, however, pose a 'Moderate' risk significance to seep wetland 1 due to the anticipated 6.74ha wetland habitat loss. In addition to the required wetland offset, key control measures that include, *inter alia*, avoiding directly impacting the seep wetlands and the maintenance of a 15m wide construction conservation buffer measured from the wetland edge, must be implemented.

Construction- and operation activities that may impact the abovementioned aquatic systems include, (a) modification of the seep wetland 1, hydrological functioning of CVB wetlands 2 and 3, and water quality, (b) alteration of the geomorphological processes (sediment balance, erosion and sedimentation), and (c) wetland habitat loss, altered wetland habitat and impacts to biota. The impact of construction- and operation activities on aquatic systems will be of 'Moderate', 'Low' and 'Very Low' negative significance with the implementation of mitigation measures contained in the EMP and aquatic specialist recommendations made conditional to this Environmental Authorisation. The loss of or alteration to wetland habitat and the impacts to biota were assessed to be of 'Moderate' significance with the implementation of mitigation measures contained in the EMP and aquatic specialist recommendations made conditional to this Environmental

Authorisation. For this reason, it will be imperative that the abovementioned wetland offset be implemented in accordance with the specifications of the National DWS.

According to the Freshwater Ecological Assessment Report (dated September 2024 and compiled by FEN Consulting), the Preferred Alternative is considered acceptable from a freshwater ecosystem management perspective, with the implementation of control/mitigation measures (also included in the EMPr).

An application to obtain a Water Use Licence in terms of the National Water Act, 1998 (Act No. 36 of 1998) was submitted to the National DWS.

Further to the above, the Maintenance Management Plan submitted together with the final EIA Report contains provisions that will ensure infrastructure is maintained in a manner that protects the integrity of the local aquatic system.

3.4 Hydropedology Impacts

Earthmoving activities (excavation) could potentially intercept subsurface flows and affect watercourse recharge. To assess the hydropedology impact of earthmoving activities for the expanded CWA, conceptual models were developed to analyse the flow paths of water and how earthmoving activities might disrupt flow paths in the landscape and affect recharge mechanisms.

Potential impacts during the construction phase include, *inter alia*, the altered natural flow of water, reduced infiltration, disruption of wetland recharge mechanisms and altered recharge of natural streams. Using various methodologies, including hydrological modeling, it was determined that at the basin scale, landscape unit and hydrological response unit scale, no major changes in hydropedological processes are predicted.

During the operational phase, the hydropedological processes are anticipated to remain largely unmodified, and the functionality of the wetlands identified within the catchment area will likely remain unchanged if stormwater is managed effectively in terms of the approved Stormwater Management Plan.

Whilst the overall hydropedological impacts were deemed to be minimal, measures which form part of the EMPr will be implemented to provide additional mitigation, which includes *inter alia*, the implementation of erosion control measures (specifically to limit loss of soil and sedimentation), restricting the development footprint areas to the demarcated areas, and discharging water from clean water diversion structures into the adjacent wetland features in an attenuated manner.

3.5 Aquatic: Groundwater

The local aquifer is classified, as 'fractured' with potential borehole yields. The groundwater quality ranges from 'ideal' to 'poor'. Users are currently extracting groundwater from the fractured aquifer. A large geological structure, *i.e.*, the Colenso Fault, is mapped on the northeastern boundary of the site. This area is required to be treated as a 'no-go' area for high risk activities during the lifecycle of the expanded CWA.

The site has a 'Low' to 'Low/Medium' vulnerability classification. Susceptibility of the aquifer to contamination from anthropogenic activities was considered to be 'Low' to 'Medium', which is attributed to the clay content of the Malmesbury Group. The clay found underlying the site, therefore provides some degree of protection to the underlying fractured rock aquifer. The aquifer vulnerability nonetheless increases to the north-east and will therefore be considered as a 'no-go' area. This requirement forms part of the provisions of the EMPr.

Several sources of contamination from the construction and operation of airports exist, *namely*; surface runoff, leaks from fuel storage and distribution, atmospheric deposition, direct release, and accidental contamination. Additionally, the proposed on-site waste

water treatment plant is considered to be a potential source of pollution. However, the concerns received about digestate from biodigesters potentially leading to nutrient pollution warranted the redesign of the wastewater treatment plant such that the feed stream will comprise of treated effluent from the on-site WWTW and cultivated biomass/energy crop. With the implementation of all required mitigation or measures for avoidance, the impact can be reduced to 'Low' and 'Very Low' negative significance. The required mitigation or measures for avoidance requires the implementation of necessary levels of protection and monitoring as well as the adherence to applicable standards regarding installations for the storage of dangerous goods.

Since groundwater will be abstracted, impacts relate to over-abstraction from boreholes leading to a reduction in regional groundwater levels. Groundwater abstraction volumes must be monitored, which includes having to cease abstraction when low groundwater levels persists and until such time that groundwater levels have recovered. This will extend to monitoring of groundwater for poor quality due to exposure and oxidation of minerals and having to cease abstraction until water quality of the boreholes recover.

The cumulative groundwater impacts will range from 'Medium' to 'Very Low' significance, with the implementation of mitigation measures contained in the EMPr.

3.6 Botanical Impacts

The site comprises of a few vegetation types specified according to the categories that have been mapped in the City of Cape Town's Biodiversity Network (2024), and includes land demarcated, as Critically Biodiversity Area ("CBA") 1a: selected irreplaceable high or medium condition site and CBA1c: selected irreplaceable low condition site.

The most northern portion of the site comprises of a remaining patch of Swartland Silcrete Renosterveld vegetation. According to the Plant Species Impact Assessment Report (dated 10 February 2025 and compiled by Nick Helme Botanical Surveys), the site has a 'High' to 'Very High' density of woody alien invasive vegetation present. The least disturbed portions of the site are of 'Medium', 'High' and 'Very High' sensitivity with increasingly high levels of indigenous plant diversity. Plant SCC were recorded in areas of 'Medium', 'High' and 'Very High' botanical sensitivity.

The primary construction phase botanical impact is the loss and degradation of the remaining natural and partly natural vegetation, including plant SCC. Since the development proposal will result in the loss of approximately 1.6ha of 'Very High' sensitivity vegetation and approximately 2.7ha of 'Medium' sensitivity vegetation, there will be a 'Medium' to 'High' residual impact for which a biodiversity offset will be implemented. The biodiversity offset compensates for the loss of the aforesaid vegetation. The biodiversity offset will measure a minimum of 89ha in extent and will take place on the Farm Hercules Pilaar No. 1242, Paarl. The biodiversity offset site contains Swartland Renosterveld and remnants with significant concentrations of Critically Endangered and Endangered SCC. Whilst the Biodiversity Offset Report (dated 20 June 2025 and compiled by Mr. M. Botha) calculated that a minimum 77ha terrestrial offset is required, a biodiversity offset area of a minimum 89ha has been proposed. This represents an overcompensation of the extent of land required to offset the on-site terrestrial biodiversity impact that the development proposal will have. As an additional safeguarding measure, the approved EMPr further includes an overarching provision which requires that 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 of Cape Town ownership), should the agreed to biodiversity offset not be implemented, as intended.

Compliance with Conditions 34 to 36 of this Environmental Authorisation will ensure that the biodiversity offset is implemented, as intended.

The main operational phase impacts include a reduction of the 'Low' to 'Moderate' levels of ecological connectivity and associated habitat fragmentation. Brush cutting the airside Open Space Areas to comply with safety Regulations may have further negative impacts on vegetation. Overall, the operational phase botanical impacts will be 'Neutral' to 'Low' negative significance with the implementation of mitigation measures and the biodiversity offset. The overall cumulative ecological impacts at the local scale are likely to be 'Neutral' or even 'Low' positive significance with implementation of mitigation measures, the biodiversity offset, and on-site management of the remaining conservation worthy areas. Mitigation measures include, *inter alia*, the conservation of the 'Very High', 'High' and 'Medium' sensitivity areas that do not fall within the development footprint (treating it as 'no-go' areas), the remaining 'Very High', 'High' and 'Medium' sensitivity botanical areas being protected by means of an ecological buffer area of at least 5m wide or being fenced off entirely, the translocation of SCCs, and a plant search and rescue operation prior to the commencement of earthmoving- or construction activities. The required measures to mitigate the botanical impacts forms part of the provisions of the EMPr and Conditions of this Environmental Authorisation (please refer to Conditions 41 to 41.14).

3.7 Fauna: General

The site has an intermediate to moderately low diversity of mammals, invertebrates, herpetofauna and avifauna. The 'Moderately Low' sensitivity portions of the site make up the largest part of the site used for foraging by most faunal species. Faunal impacts during the construction phase include, *inter alia*, loss of habitat, displacement of species, potential increased mortalities, potential poaching/snaring, and loss of habitat connectivity and movement corridors. During the operational phase, faunal impacts include, *inter alia*, increased mortalities, noise and light pollution negatively affecting fauna.

It should, however, be noted that the site is located within a region that has already been subjected to extensive land transformation and habitat degradation, stemming from agricultural activities, urban/peri-urban development as well as extensive alien plant proliferation. This has resulted in a notable cumulative loss of faunal habitat within the region.

Adhering to the various measures included in the EMPr will contribute to mitigating the identified faunal impacts. In this regard, it is required that construction activities be undertaken in a controlled and confined manner. During the operational phase, it is required that sound environmental management practices be adhered to whilst ensuring that no deliberate acts are permitted that would result in further negative impacts, e.g., the prohibition of hunting, trapping, or setting of snares by personnel.

The site has different broad habitat units viz. Renosterveld Habitat, Freshwater Habitat, Modified Habitat and Artificial Impoundments and Agricultural Drains. With the exception of small isolated remnant patches of natural habitat remaining with limited species diversity and faunal abundance, the abovementioned habitats are largely in a modified state. This has resulted in a significant degree of habitat loss for faunal species, and a marked decrease in faunal species diversity and abundance. In light of this and the site's extensive footprint, the Faunal Assessment Report (dated February 2025 and compiled by Scientific Terrestrial Services (Pty) Ltd), confirmed that the development proposal is not expected to result in a significant loss of natural habitat, resources or faunal species diversity. The development proposal was therefore recommended for approval from faunal perspective, provided that faunal mitigation measures included in the EMPr are implemented.

3.8 Fauna: Avifauna

The site does not fall within any Important Bird and Biodiversity Areas ("IBA"). The closest IBA is the Rietvlei Wetland: Table Bay Nature Reserve IBA, located 20km to the west of the study area.

The field observations reported on in terms of the Avifaunal Assessment Report (dated February 2025 and compiled by Scientific Terrestrial Services (Pty) Ltd), revealed that *Grus paradiseus* (Blue crane) particularly favours the on-site cultivated fields, which may be negatively impacted upon due to the newly expanded CWA. Other avifauna observed during field observations include *Phoenicopterus roseus* (Greater Flamingo, NT), *Phoenicopterus minor* (Lesser Flamingo, NT), *Circus ranivorus* (African Marsh Harrier, EN), *Circus maurus* (Black harrier, EN), *Falco biarmicus* (Lanner Falcon, VU), *Sagittarius serpentarius* (Secretarybird, VU), *Aquila verreauxii* (Verreaux's Eagle, VU), *Pelecanus onocrotalus* (Great White Pelican, VU), and *Oxyura maccoa* (Maccoa Duck, NT).

The avifaunal diversity associated with the site is considered 'Moderately Low', mainly consisting of common avifaunal species, with few rare and reclusive birds observed. In terms of food availability, the site is considered to have a 'Moderately Low' abundance of forage for avian species as a result of the historic and existing agricultural activities and severe Alien Invasive Plant proliferation. Transformation by historic and existing agricultural activities has resulted in 'Moderate' habitat integrity. Habitat availability is considered to be patchy and ranges from 'Intermediate' to 'Moderately Low'.

The development proposal will ultimately lead to a reduction in habitat, which may increase resource competition in adjacent habitats due to species displacement. The scale of edge effects that may be experienced may cause further degradation to the surrounding habitat if not appropriately managed. Other impacts include an increase in both air- and road traffic that may increase the possibility of collisions, surface water features that will attract birds and may increase the potential for collisions and loss of/changed avifaunal species habitat, diversity, movement patterns and breeding opportunities. According to the findings of the Avifaunal Assessment Report (dated February 2025 and compiled by Scientific Terrestrial Services (Pty) Ltd), the perceived impact significance to the avifaunal assemblages of the site can be suitably managed provided that mitigation measures are implemented. With mitigation, impacts can be reduced to 'Medium' to 'Very Low' significance levels. The development proposal was therefore recommended for approval, provided that all management and mitigation measures are implemented. Mitigation measures include the requirement for construction activities to take place in a controlled and confined manner. During the operational phase, sound environmental management practices and other measures must be adhered to in order to limit and/or mitigate impacts on avifauna and associated habitat. These mitigation measures have been included in the EMP.

3.9 Poultry Biosecurity and Impacts

Due to the effect of the expanded CWA on the adjacent poultry farms, aspects that could affect the biosecurity of poultry farms and the health of poultry were assessed in the Biosecurity, Poultry Health Study (dated March 2024, with revisions dated January 2025 and compiled by Dr. Deryn Petty).

During the construction phase, dust and elevated noise levels could affect nearby poultry farms. During the operational phase, poor air quality can affect broiler performance and suppress immune function.

According to the Air Quality Impact Assessment Report (dated June 2025 and compiled by DDA Environmental Engineers), it was determined that long-term air quality is unlikely to significantly impact poultry farms. Whilst the on-site WWTW will generate ammonia emissions, the facility will be located too far away from the local poultry farm (County Fair) to be of 'Negative' significance. In terms of noise, the average noise levels show small impacts on the County Fair farm. Based on the contours, there is a minimal average effect of noise on the County Fair farm of 55db. The effect of noise from trucks and cars arriving at- and leaving the expanded CWA can be a significant source of noise, hence careful planning of road layouts and/or traffic calming measures must be considered to mitigate noise impacts (refer to Conditions 45 to 46).

Regarding the impact of vibrations on birds and chickens, it was emphasised that noise from aircraft vibration is intermittent. The walls of poultry houses and the boundary walls around the poultry farm will act as 'dampers' and prevent the resonance frequency from being achieved at the poultry facility.

Although light pollution can disrupt the circadian rhythm, another important consideration is the startling of the birds from headlights shining into poultry sheds at night. In this instance, poultry would respond to being startled by bunching together in a corner away from the stimulus and killing each other by suffocation. Therefore, in terms of the Visual Impact Assessment Report (dated 26 February 2025 and compiled by Filia Visual (Pty) Ltd), the proposed lighting measures will include specific focus on mitigating the impacts of light pollution on the poultry farm in the vicinity of the site. It is required that the Site Development Plan responds to the impact of light pollution by specifying the guidelines to be followed, which must include lighting design concepts that reduces impacts on the surrounds and a lighting audit to be conducted to ensure that all lighting related mitigation measures are adhered to and successfully implemented (refer to Conditions 40 to 40.2.).

Since the newly expanded CWA will accommodate food supplies and trading, the likelihood of the presence of rodents and pests may pose a risk to the neighbouring poultry farms. Hence, the waste handling of the development proposal must incorporate measures to reduce such risks and mitigate any resultant impacts. The Waste Management Plan (dated July 2025 and compiled by PHS Consulting), which incorporates such measures will be implemented (refer to Condition 24). Parallel to this, it should be noted that the use of a biodigester to convert poultry manure and feed waste into methane needs has been amended to the use of grass feedstock and treated sewage water instead. These changes are based on previous concerns raised by I&APs regarding the use of chicken manure on-site and the associated impacts of such practices.

Careful consideration must be given to reduce the likelihood of any new dams attracting wild birds that will increase the risk of spreading contagious diseases to the nearby poultry farm(s).

The Biosecurity, Poultry Health Study concluded that with suitable mitigation measures it should be possible for the said poultry breeder farm and the proposed airport to coexist.

3.10 Agricultural Aspects

The site is located in an area of agricultural significance in terms of the Municipal SDF. The majority of the properties, *i.e.*, Portion 7 of the Farm No. 942, the Remaining extent of the Farm No. 474 and Portion 3 of the Farm No. 474, Fisantekraal, will retain its Agricultural zoning and encompass the Agricultural Precinct. The Agricultural Precinct is therefore the largest Precinct of the expanded CWA with a coverage of approximately 462ha (approximately 53% of the site).

The portion of the runway located within an area of "Agricultural Significance" is considered to have a low impact on existing agricultural activities, since this portion is located within an existing mining servitude of approximately 24.9 hectares.

The site comprises of soils with a strong structure and high clay content, making the soil mostly imperfectly to poorly drained. The strong structure in the subsoil places a restriction on root development. Most of these soils have a sandier topsoil on a clay subsoil that are usually sensitive to erosion if poor management practices are applied.

The site has very limited access to water that can be used for irrigation with most irrigation water being extracted from boreholes. This, coupled with varied rainfall seasons, reduces the site's agricultural potential (especially irrigated agriculture), except for the potential of winter small grain production and livestock farming.

The potential for irrigated agriculture is regarded as 'Very Low'. The potential for winter small grain production is regarded as 'High', depending on the properties of the soil.

Livestock farming potential is reduced by limited grazing during the late summer months, but the potential is regarded as 'Medium-High'. External factors such as security issues and livestock theft, especially for a site located moderately close to the Cape Metropole, can be regarded as a constraint limiting small livestock farming.

The Agro-ecosystem Impact Assessment Report (dated February 2025 and compiled by Agri Informatics) determined that the impact of the loss of 168ha high potential productive land is regarded to be of 'High' significance. Of this 168ha area, only 100ha (60%) is being cultivated (wheat production). This means that there is a negligible reduction of 0.02% of the total national wheat production and 0.03% of the Western Cape's wheat production. It is argued in the said Assessment Report that the impact on food security will be mitigated with the expanded CWA supporting food security through its contribution to access to food, its role in food distribution logistics as well as job creation that will lead to wider food affordability.

The said Assessment Report justified the impact of losing high potential productive land in terms of the perceived importance of the expanded CWA as a key infrastructure node for the Cape Metropole and surrounding districts. The development proposal was therefore supported and recommended for approval.

3.11 Geotechnical Impacts

A regional fault system (the Colenso Fault) is mapped along the northeastern boundary of the site. The said fault system lies within the Agricultural Precinct, and is not deemed to pose a significant constraint to the expanded CWA.

According to the Geotechnical Reconnaissance Investigation Report (dated 31 May 2022 and compiled by GEOSS South Africa (Pty) Ltd), the development proposal can take place from a geotechnical perspective. However, precautionary- and other additional measures are required to be implemented to overcome engineering-geological problems, including, *inter alia*, the conduct of exploratory drilling and follow-up geotechnical investigations, prior to the construction of individual structures.

3.12 Mining Aspects

The existing quarry on Portion 23 of the Farm No. 724, Fisantekraal has an existing Mining Licence. The quarry will be converted into a stormwater retention facility to support the stormwater management of the expanded CWA. Proof of having lodged the required application with the Competent Authority to obtain a mining closure certificate for the quarry was provided.

3.13 Heritage Impacts

According to the Heritage Impact Assessment ("HIA") Report (dated October 2024 and compiled by Aikman Associates Heritage Management), there are no built environment heritage resources of significance. Although two of the structures in the study area are older than sixty (60) years neither of them is of aesthetic significance nor deemed to be conservation worthy. The site is not archaeologically sensitive. It was concluded that the impact on heritage resources will be of 'Low' significance. Additionally, the expanded CWA will have immense sustainable social and economic benefits. The expended CWA was recommended for approval, subject to the implementation of the mitigation measures set out in the Visual Impact Assessment Report (dated 26 February 2025 and compiled by Filia Visual (Pty) Ltd). It was further confirmed in the Archaeological Scoping Report (dated October 2023 and compiled by ACRM), that the expanded CWA will not impact on important 'Stone Age' archaeological heritage resources.

The correspondence from Heritage Western Cape (dated 7 February 2025), indicated that the HIA Report (dated October 2024 and updated on 7 February 2025) meets the provisions of Section 38(3) of the National Heritage Resources Act, 1999 ("NHRA") (Act No. 25 of 1999), and the expanded CWA is therefore endorsed.

The implementation of Conditions 19 and 20 of this Environmental Authorisation will help to ensure the protection of any heritage resources that may be encountered on the site.

3.14 Visual Impacts

The receiving environment (5-10km radius around the site) predominantly comprises of agri-industrial and suburban (and industrial) land uses within the Urban Edge. A number of bulk infrastructure features, including Eskom servitudes containing overhead powerlines, distribution lines, sub-stations and telecommunication infrastructure exist. These features contribute to visual clutter and discordant elements visible in the landscape surrounding the site. Other features include masts of the Goedverwacht Radio Station, the Fisantekraal WWTW, various poultry batteries, the Durbanville Industrial Park, some mining-related land uses and industries. The land uses further away include agriculture, agri-industrial, peri-urban/industrial (concentrated along the Klipheuwel corridor) and urban/residential. The receiving environment therefore has a mixed landscape character and 'Sense of Place'.

According to the Visual Impact Assessment Report (dated 26 February 2025 and compiled by Filia Visual (Pty) Ltd), the 'Zone of Potential Visual Influence' for the development proposal is between 3km and 5km (may increase to 10km at night). The overall development proposal will result in 'Moderate' visual intrusion (with aspects of 'Low' visual intrusion and 'High' visual intrusion). This is due to, *inter alia*, the expanded CWA contrasting moderately with patterns and elements that define the structure of the landscape, and development proposal being partially compatible with land use, settlement and enclosure patterns. The 'High' visual intrusion is attributed to the development proposal being unable to be 'absorbed' into the landscape.

In terms of visibility, the overall development proposal will result in 'Moderate' to 'High' visibility. This is due to the development proposal being visible from more than half of the 'Zone of Potential Visual Influence', views that will partially be obstructed and many viewers that will be affected. In this regard, the sensitivity of visual receptors will vary, depending on their distance from the site.

In terms of compatibility, the overall development proposal demonstrates 'Medium' compatibility relative to the receiving environment, since it will introduce entirely new or unprecedented elements into the landscape. In the same way, the overall development proposal will cumulatively result in an increase in developed land and conditions of urbanity within the Northern District of the City of Cape Town. The possibility, however, exists for positive cumulative visual impacts, if the undeveloped areas of the site are not degraded, and are managed actively to maintain scenic quality. Cumulative visual impacts extend to the visual impacts of lights at night, especially for viewers located within the surrounding landscapes. Little scope for mitigation exists, due to lighting requirements having to meet aviation safety specifications. This implies that negative visual impacts during the operational phase will remain of 'Medium' significance after mitigation, whereas during the construction phase visual impacts will be of 'Low' to 'Very Low' significance after mitigation. An Overall Lighting Report and a lighting proposal must be prepared prior to the commencement of construction activities in order to address aspects of light pollution and the impacts on surrounding areas (refer to Condition 40.1).

The signage and advertising for expanded CWA mounted on the site is required to comply with the relevant municipal requirements and By-Laws.

Mitigation measures must adhere to Urban Design Guidelines, including aspects of fencing, walls, entrances and boundary interfaces, lighting as well as materials and finishes, and Landscape Guidelines. Other mitigation measures that will help to enhance the aesthetics and functioning of the site include, *inter alia*, employing modern aesthetics, developing engaging public areas, implementing innovative roofscapes, having functional colonnades that offers shelter from various elements, having abundant landscaping, incorporate finishes and materials that pay homage to the local context, employing inventive design solutions to elevate the visual and utilitarian facets of buildings,

ensuring that signage is harmonious, adopting other people-centric design elements and adhering to visual buffers zones to limit visual impacts from certain viewpoints in the receiving environment. During the construction phase, good management practices must be implemented to help achieve a 'Low' negative significance rating for visual impacts.

Based on the outcomes of the said Visual Impact Assessment, it was concluded that the expanded CWA can be supported in the context of the EIA application.

3.15 General/Aviation Aspects

The existing airport will be upgraded to a Category 9 Aerodrome licensed with the SACAA. All requirements must be met in order to permit the development proposal on the site. In this regard, it was illustrated during the EIA process that the development proposal complies- or will comply with the following requirements and provisions:

- Compliance with the Civil Aviation Act, 2009 (Act No. 13 of 2009);
- The White Paper on National Civil Aviation Policy, 2017 ("NCAP");
- The National Airports Development Plan, 2015 ("NADP");
- The White Paper on National Transport Policy, 2021 ("NTP");
- The National Transport Master Plan, 2050 ("NATMAP 2050");
- The requirements in terms of the Chicago Convention, 1944; and
- The International Civil Aviation Organization ("ICAO") Regulations.

A total of 24 aerodromes are located within a twenty (20) nautical miles radius of the site. Other civil aviation installations near the site include navigational aids and surveillance equipment. In addition, various Wide Area Multilateration ("WAM") antenna sites are planned in the wider area.

Airspace:

The current airport does not have any designated airspace and falls within the Cape Town Special Rules Area. Therefore, a request will be made to join controlled airspace to acquire an instrument joining clearance from Cape Town Air Traffic Control.

The increase in flight activity for the expanded CWA will affect the flight operations at nearby aerodromes, *namely*; civil aviation aerodromes, AFB Ysterplaat and CTIA. Therefore, to determine safe and efficient ways of operating flights in and out of the site in relation to the existing aerodromes, various studies were commissioned, which is discussed below.

The Airspace and Capacity Study (dated 22 March 2024 and compiled by Straten Consulting Services Limited) addresses certain aspects of airspace in the context of the existing environment as well as existing airports. The study determined that the CWA (FAWN) will be able to operate independently from CTIA (FACT). Any future development plans for FACT are not expected to be an issue. The runway re-alignment will enhance airspace use and further cement the independent operations between the two airports. However, the Airport Task Force that was commissioned by Capewinlands Aero (Pty) Ltd. dealt with specific concerns that will help determine the detailed airspace design requirements. In a similar manner, the requirements in terms of general aviation must be confirmed in consultation with all relevant stakeholders and authorities in the aviation sector. These requirements fall beyond the scope of this Scoping and EIA application process.

The Visualization of FACT and FAWN Combined Operations Report (dated October 2023 and compiled by Royal NLR - Netherlands Aerospace Centre) provides visualization material to display the combined operations between CTIA and the expanded CWA in order to identify conflicts that may arise in terms of the traffic flows between the two airports. The results indicated that in terms of air traffic patterns, no delays or bottlenecks will be experienced, and the virtually 'parallel' routes will contribute to avoiding capacity restrictions at the said airports. No capacity constraints nor conflicts were identified, with the latter being attributed to the parallel approaches/routes to and from the airports.

Additionally, the Civil Aviation Compliance Statement (dated 26 May 2025 and compiled by Royal HaskoningDHV (Pty) Ltd) found that the expanded CWA will impact airspace operations in the area, as well as neighbouring developments. However, the airport must adhere to all prescribed methods and comply with applicable legislation, regulations, standards, and recommended practices. In this manner, the associated impacts must be appropriately mitigated and managed, resulting in a compliant airport with operations that will integrate into the regional and national civil aviation environment.

Obstacle Evaluation:

Annex 14 Obstacle Assessment Report (dated 4 October 2022 and compiled by ATNS) details the assessment of the surveyed obstacles to investigate their influence on existing or future instrument procedures and whether these obstacles will have any effect on the Annex-14 surfaces. An evaluation of the natural- and man-made constructions inside and outside of the site's boundary was conducted to determine the limitations on the distance available for take-off and landing and on the range of meteorological conditions in which take-off and landing can be undertaken. This evaluation was required in order to establish the necessary measures to ensure the safety of aircraft during take-off or landing, or while flying in the vicinity of an airport. These measures will ensure the safety of the passengers and crews aboard them. It was determined that the surveyed obstacles were found not to have any impact on aircraft operations. It is, however, required that all structures and buildings in and around the airport be treated as an obstacle and should be clearly marked and identified (this includes meeting the requirements of day and night markings). The detailed specifications required by the relevant authorities, including the SACAA, with respect to obstacles and its influence on the operations of the expanded CWA must be adhered to.

Concept of Operations:

The integration of the airspace around the expanded CWA with the existing controlled airspace around CTIA to ensure safe, efficient, and harmonious air traffic management whilst accommodating the growing demand for air travel and aviation activities in the region and at the same time adhering to the South African National Airspace Masterplan was considered, as part of the 'Concept of Operations'. In this regard, the surrounding civil aviation sites and small aerodromes, model aircraft sites, the key aerodromes as well as 69 obstacles were identified. This information will be incorporated into the detailed airspace design of the expanded CWA to determine the measures required to ensure safe, efficient, and harmonious air traffic management. These considerations will be applicable when the airspace of the expanded CWA becomes available. According to the Development of an Airspace CONOPS for the Cape Winelands Airport Report (dated 8 October 2024 and compiled by NACO – a company of Royal Haskoning DHV (Pty) Ltd), other technical instruments related to flight procedures will be determined and finalised during the lifecycle of the expanded CWA. Applying for airspace approval is a separate formal process for which the National Airspace Committee ("NASCOM") is the Competent Authority.

Bird Strike

The Bird Strike Risk Assessment Report (dated September 2024 and compiled by Avri Avian Environmental) was specifically commissioned to determine the risk birds pose to aviation safety and is a requirement for obtaining a license from the SACAA. The said Assessment (dated September 2024 and compiled by Avri Avian Environmental) used the ICAO methodology, which includes the consideration of a 13km radius around the site as well as the consideration of the primary- and secondary bird hazard zones where collisions may occur. Further considerations included local bird diversity and land uses that may attract birds. Using the assessment criteria, a subset of bird species was identified that were either frequently recorded and/or having a high hazard/risk level within both the primary- and secondary bird hazard zones. The results showed that the agricultural land use and water bodies within the primary bird hazard zone surrounding the site contributes to the presence

and abundance of high-risk bird species. Hence, various management and mitigation measures must be implemented to address the risk that birds and birds strikes. These measures will form part of the Bird and Wildlife Hazard Management Landscape and Open Space Planning Guideline that must be implemented (refer to Condition 38).

3.16 Defence Aspects

The site is deemed to be of 'Medium' sensitivity due to its proximity to a Military and Defence Site, i.e., the Goedverwacht communications base, located to the southwest of the site. According to the Annex 14 Obstacle Assessment Report (dated 4 October 2022 and compiled by ATNS), the proposed airspace procedures will not interfere with military airspace. Furthermore, it has been determined that there will not be a need for new communication system frequencies, and frequency interference with existing defence installations and radar systems is unlikely. Proof that the South African National Defence Force, the South African Air Force and National Airspace Committee have been consulted during the application process has been provided with the public participation particulars. It was confirmed, as part of the Aviation Specialist Studies in support of the Environmental Impact Assessment at Cape Winelands Airport (dated 23 August 2024 and compiled by Royal HaskoningDHV (Pty) Ltd), that no military/defence-related activities take place at the existing airport.

3.17 Sustainability and Climate change

The Climate Change Impact Assessment Report (dated February 2025 and compiled by Brundtland Consulting (Pty) Ltd), assessed the potential contribution of the expanded CWA to climate change through the production of Greenhouse Gas ("GHG") emissions from its direct and indirect activities, and also considers the impact that climate change could have on the operation, value chain and environment of the expanded CWA. Emissions have been determined up to 2050 to coincide with South Africa's net-zero emissions scenario. The abovementioned Assessment determined the vulnerability of the expanded CWA to the risks of climate change and the associated impacts.

To determine the vulnerability of the expanded CWA to the risks of climate change, a physical risk assessment, inclusive of historical climate data and future climate projections, was undertaken. In terms of physical risks related to the physical impacts of climate change, the identified climate risk that may impact the expanded CWA includes, *inter alia*, wildfires, landslides, water scarcity, extreme heat and flooding. Water scarcity and extreme heat heightened the identified risks. This is attributed to the effect of variable temperatures and weather patterns caused by climate change. Both reactive- and proactive mitigation and adaptation measures that must be implemented have been included in the EMP. These measures will reduce the vulnerability of the expanded CWA to each of the identified climate-related risks. Such measures focus on enhancing the expanded CWA to achieve the goals of water resilience (see Condition 32), water sensitivity, flood-readiness and storm management, managing fire risk and responsiveness, having zero emissions buildings and adopting sustainable waste and energy solutions.

In terms of climate change risk, the carbon footprint of the expanded CWA was defined by considering the GHG emissions of the development proposal. High emissions levels were estimated for the construction phase, which has been attributed to the use of cement, steel, asphalt, and plastics for the development of roads, runways, and stormwater infrastructure, fuel and energy used for the operation of machinery, embedded common construction materials, emissions related to electrical infrastructure and emissions caused by vehicular trips to and from the site.

During the operational phase of the expanded CWA, which is projected to be fully operational in 2050, the total emissions across different scopes (i.e., emissions released directly, indirectly and through value chain emissions) up to the year 2050 are approximately 5.3 million tons of carbon dioxide equivalent, assuming that the proposed renewable energy technologies have been implemented and mitigation was applied to any hard-to-abate emissions.

It was determined that the direct operation of the expanded CWA would have a 'Low-Medium' impact due to the planned sustainability measures to be implemented. The total projected emissions would have a 'Medium' impact on the National Carbon budget due to the significant contribution on account of value chain emissions, including domestic aviation, to the development proposals overall carbon footprint. It is expected that the emissions from domestic aviation will be considered in terms of the Carbon Tax and the mandatory carbon budgets allocation under the Climate Change Act, 2024 (Act No. 22 of 2024). Scope exists to reduce future growth-induced emissions with the establishment of improved Infrastructure. Indirectly, with the expanded CWA being used as an 'alternate' airport, the emissions resulting from diversion could be reduced by 3-5%.

Specific components of the expanded CWA will be responsive to aspects of sustainability and climate change. Building design will, for example, incorporate measures to enable urban cooling and heat responsiveness. The installation of the Solar PV and the biodigester will help to reduce the energy demand from Eskom whilst ensuring that the expanded CWA becomes more self-sufficient through decreased reliance on non-renewable and fossil fuels, as sources of energy. Emission reduction will be achieved by limiting the use of combustion engines and promoting the use of electric vehicles on the site. In terms of adhering to a circular waste economy, a Waste Management Plan will be implemented, which involves waste minimisation at source with for zero waste to landfill, as far as it is possible.

Overall, the expanded CWA will impact climate change from a construction- and operational perspective. The extent of climate change impacts is classified as global, and the duration is defined to be long, since climate change impacts could potentially be reversed. The total impact (including cumulative) is deemed to be of 'Medium' significance.

Whilst the expanded CWA will produce GHG emissions, it offers a socio-economic boost to the region and local economy, including tourism. As a reliever airport, the expanded CWA could improve operational efficiencies for airlines, as explained above. The expanded CWA therefore aligns with national- and global climate goals, whilst ensuring resilience against evolving climate challenges by implementing the planned mitigation and adaptation strategies.

3.18 Noise Impacts

According to the Noise Impact Assessment Report (dated June 2025 and compiled by DDA Environmental Engineers), noise modelling based on current and future projected air traffic simulation figures was used to determine noise impacts, which included the use of stationed monitoring points. Ambient noise measurements were performed in order to establish the existing ambient noise levels in the surrounding areas.

During the construction phase, general construction activities are likely to temporarily increase the local noise level. The typical construction activities causing noise include, *inter alia*, the establishment of the construction camp and site preparation works, initiation of the main civil and electrical works, major civil and electrical works, commissioning of runway 01-19, and the use of construction equipment and vehicles on the site. Certain parameters, including average height of noise sources: 2m, construction operating hours: 24 hr (used as a worst-case scenario), no noise barriers in place and various construction site equipment being on-site, were considered. Based on these determinations, it was found that the noise levels at the closest community receptors are not expected to exceed the SANS Guidelines for Urban Residential Areas during the construction phase. Standard measures form part of the EMPr to mitigate noise during the construction phase, including noise monitoring (refer to Condition 45). Noise impacts during the construction phase is deemed to have a 'Low' significance rating with the implementation of mitigation measures.

During the operational phase, noise from airport operations were simulated with the use of the US FAA's AEDT model with various other factors and parameters considered, including *inter alia*, the operations driven by market time over time, the type of aircraft to be used, the flight times at the airport, and flight paths. The operational noise scenarios modelled, included the following scenarios:

- Scenario 1: Existing operations at full capacity ('No-Go' Alternative);
- Scenario 2: New runway in operational year; and
- Scenario 3: New runway at full capacity.

In terms of Scenario 1, the 60 A-weighted decibels ("dB(A)") zone for the day-night noise rating level is completely contained within the site. The total area affected by noise levels higher than 55dB(A) is 2.47km². A small portion of this noise contour extends beyond the R312 Regional Road towards the south, within the Greenville Garden City residential development. The noise contour above 70dB(A) is 8.6km², and a large portion of this area extends beyond the boundary of the site primarily into the Greenville Garden City residential development and into the Bella Riva residential development.

In terms of Scenario 2, the 55dB(A) noise contour will largely be contained within the site, with the only extension of the noise contour measuring 1.44km² from the site (*i.e.*, no extension of the 55dB(A) noise contour into the residential areas proposed west and south of the site). The 60-65dB(A) noise contour will extend 0.51km², the 65-70dB(A) noise contour will extend 0.15km² and the 70-75dB(A) noise contour will extend 0.03km² with no further noise contours/impacts.

In terms of Scenario 3, the impact zones will extend beyond the boundary of the site. The length of the 55dB(A) impact zone will reach 4km north from the northern site boundary, in a north-north-westerly direction and reach (not overlap) the Klipheuvel residential area. Towards the west, the 55dB(A) contour will reach the Bella Riva residential development.

South of the site, the 55dB(A) noise contour will extend less, reaching a distance of 3.3km, which will overlap with the Greenville Garden City residential development. Immediately south of the runway, the noise levels will be between 60dB(A) and 63dB(A).

In terms of discrete receptors (*i.e.*, sensitive receptors, such as schools and other individual farmhouses around the site), the noise levels calculated indicate that schools identified (*i.e.*, R04, R25 and R27) will be outside of the 50 dBA zone for all three scenarios. The SANS 10103 District guidelines for urban residential areas are only exceeded for (1) one small area on the eastern side of Bella Riva residential development for Scenario 3, (2) an area immediately south of the site for Scenario 1 and Scenario 3 (R21), and (3) a farm house (R28) situated on the eastern side of Klipheuvel, which a receptor situated further away from the site.

The necessary noise mitigation measures have been included in the EMPr and made conditional to this Environmental Authorisation (refer to Conditions 45 to 46). The provisions of the EMPr require that considerations be given to the implementation of 'passive' mitigation measures, such as noise insulation on existing residential dwellings and noise-sensitive buildings (schools, hospitals, *etc.*). Additionally, noise mitigation measures are particularly required for Scenario 3 and will be finalised when consultations between the relevant stakeholders have taken place (refer to Condition 45.1).

3.19 Air Quality Impacts

Potential health nuisances related to the development proposal include the generation of dust, which will negatively affect air quality during the construction phase. Dust deposition is expected to increase in close proximity to various construction activities (within 300m of the working fence). The extent of this impact is considered to be largely confined to the site. Dust impacts will be of 'Very Low' negative significance without mitigation and 'Insignificant' with the implementation of mitigation measures during the construction phase. The exhaust emissions from trucks and equipment at the site are

expected to marginally increase air pollution concentrations during the construction phase, but this increase in exhaust emissions will largely be confined to the site. The expected impact of exhaust emissions during the construction phase is therefore considered to be 'Insignificant'.

According to the Air Quality Impact Assessment Report (dated June 2025 and compiled by DDA Environmental Engineers), a simulation using the US FAA's AEDT model was used to determine the resulting air pollution levels around the site due to the operation of the expanded CWA, for the following scenarios:

- Scenario 1: Existing runway setup under full utilisation ('No-Go' Alternative);
- Scenario 2: Operations on the new runway 01/19 in the operational year; and
- Scenario 3: Operations on the new runway 01/19 at full capacity.

In terms of Scenario 1, air pollution concentrations were well within respective guidelines with no exceedances observed. However, cognisance was taken of the two residential areas planned to be developed immediately south- and west of the site. Once these communities are established, the sensitivity of the area would be considered moderate, assuming appropriate buffer zones will be established.

In terms of Scenario 2, the air pollutant levels outside the boundary of the site will be very low. The air pollution concentrations during the operation phase of the expanded CWA are expected to be very low at the Fisantekraal community, and the new developments located west and south of the site. Air pollution concentrations during the operational phase of the expanded CWA are therefore within the air quality standards modeled by the US FAA's AEDT. The overall air quality impact for Scenario 2 will be of 'Very Low' significance.

In terms of Scenario 3, the only exceedance in Nitrogen Dioxide ("NO₂") concentrations was in small areas located south and north of the expanded runway. However, the exceedance number per year was only 2 and therefore below the allowable exceedances of 88 per year. In terms of the maximum ground-level Sulfur Dioxide ("SO₂") and PM₁₀ concentrations, both the 1-hour guideline and the maximum annual concentrations were not exceeded. Furthermore, the air pollutant levels at the identified community receptors, including at Fisantekraal and Klipheuwel, were found to be well within the standards modeled by the US FAA's AEDT. The resulting overall impact of Scenario 3, before capacity is reached, is expected to be of 'Low' significance with the implementation of mitigation measures.

The measures required to be implemented to mitigate impacts on air quality during the construction- and operational phases have been included in the EMPr. During the construction phase, mitigation measures focus on dust suppression and measures to control the manner in which construction activities ought to take place. During the operational phase, some of the required mitigation measures include investing in aviation technologies and practices that would ultimately reduce the amount air emissions, and air quality monitoring (refer to Conditions 44 to 44.2.). In addition, continuous air quality monitoring must be conducted.

The expanded CWA will invest in measures that encourage the use of electric vehicles, as opposed to conventional combustion engine-powered vehicles in order to help minimise air pollution caused by vehicular emissions.

To assess the potential cumulative impacts, individual modeling was carried out for County Fair, Clay Industry, the Fisantekraal WWTW and Claytile. The resulting ambient concentrations modelled for these receptors located around the site revealed that the maximum concentrations of all pollutants and time averages are below their respective guidelines in terms of each of the above scenarios.

An Atmospheric Emission Licence ("AEL") in terms of the National Environment Management: Air Quality, 2004 (Act No. 39 of 2004) will be required for the total bulk storage of dangerous goods on the site.

3.20 Pollution Aspects

The risk of pollution on the site can be attributed to operations and leaks from storage, distribution and the general use of chemical substances, cleaning agents, oils and other fuels stored on the site. Practical measures to be implemented to reduce such risks focusses on the implementation of various levels of protection, monitoring and an adherence to relevant industry practices and international airport development guidelines. These measures will ensure that any impacts on groundwater users in the local areas associated with accidental leaks and spillages will be of 'Low' negative significance. These mitigation measures have been included in the EMPr.

3.21 Health Impacts

Based on the predicted 1-hour maximum ground-level concentration contours and the cumulative concentration data, the levels for all air pollutants within the site are not expected to reach the Occupational Exposure Limits ("OEL"). The health of workers will, however, depend on other microenvironment conditions. The applicable Occupational Health and Safety Standards and specific requirements for airport workers must be enforced, as required in terms of the relevant enabling provision(s).

3.22 Hazards and Risks

Fire risk management has been identified as one of the key safety considerations for the site. A Fire Management Plan has therefore been developed for the site to effectively deal with such risks. Additionally, the placement of fire water tanks on the site, the inclusion of fire protection measures in the design of buildings, the provision of response vehicles, and personnel trained in firefighting, will be required. Provisions have been made for fire breaks to be established to prevent veldfires on the site. The required removal of alien vegetation on the site that will be undertaken in terms of the Alien Vegetation Management Plan will decrease the intensity of runaway veldfires.

Since off-site incidents may result due to hazards of some of the fuels to be stored on, produced at, or delivered to the site. The main hazards that would occur with a loss of containment of hazardous components on-site include exposure to thermal radiation from fires and overpressure from explosions. The Major Hazard Installation Study (dated 14 August 2024 and compiled by RISCUM (PTY) LTD) found that the facilities at the expanded airport would be classified as a Low Hazard Establishment Major Hazard Installation, resulting in the risks to the general public being considered. Various measures must, however, be implemented to reduce the likelihood and impact of hazards, if it should occur. These measures, as per the provisions of the EMPr, centers around the need for containment of dangerous and other goods as well as adhering to international best practice and industry standards.

Given the nature of the development proposal and the fact that Solar PV panels will be installed on the site, glaring and the risk of exposure to the Air Traffic Control Tower and associated operation of the expanded CWA exist. In order to eliminate glare, the Solar PV panels proposed in the south-eastern portion of the Services Precinct have been removed. According to the Aviation Glint and Glare Assessment Report (dated 4 March 2025 and compiled by Future Impact (Pty) Ltd), the glint and glare impacts will be of 'Very Low' significance. This is considered acceptable in terms of the United States FAA Regulations. Furthermore, it has been recommended that the development proposal receive authorisation from the SACAA from a glint and glare perspective.

The expanded CWA falls outside the Koeberg Nuclear Protection Zone.

3.23 Competition

Since the expanded CWA will be the second commercial airport within the City of Cape Town, competition exists. In this regard, it was argued that the expanded CWA will complement the existing CTIA by providing an injection of needed capacity during peak hours. The location of the site provides more choice as well as a convenient and safe airport option for travelers. Having a city with two airports will result in improved connectivity, increased capacity, operational efficiency, economic benefits, and a more resilient travel experience for passengers. Furthermore, should any one of the airports face operational issues, the option to make use of the other airport exists.

The demand for direct air services at the expanded CWA was informed by research, data and industry consultations. It was forecasted by the Netherlands Airport Consultants that the expanded CWA will process approximately 5 million passengers per annum by 2050 out of the total 20 million passengers travelling to Cape Town. The expanded CWA is therefore forecast to process approximately 25% market share within 25 years, which equates to an increase of 1% per year.

The function of the expanded CWA as an 'alternate' airport will result in additional benefits, including (a) improving the attractiveness of the city to host major events by providing additional airport capacity, (b) continuity of economic activity (trade and tourism) in the event of an extended closure at the CTIA, (c) offering additional temporary- or permanent capacity during peak periods, and (d) countering redundancy in the event of catastrophic fires, structural failures, fuel or power supply interruptions.

Having a second commercial airport will benefit travelers in instances where flights have to be diverted, since the CTIA and the expanded CWA are located only 25km away from each other within the same City. Travelers will therefore reach their intended destination with minimal disruptions. The expanded CWA may relieve any general aviation constraints experienced by CTIA given the latter's core function as a commercial airport where priority is given to the large volume of scheduled airline traffic. The expanded CWA includes the development of required infrastructure that will permit general aviation.

Precedent was used to illustrate other cities that have more than one airport. These cities include, (a) London (Heathrow and Gatwick Airports), (b) New York City (JFK, LaGuardia, and Newark Airports), and (c) Johannesburg (OR Tambo and Lanseria Airports).

According to the Cape Winelands Alternate Aerodrome Feasibility Study (dated 26 April 2024 and compiled by Munich Airport International GmbH), the expanded CWA fulfills the criteria for being a suitable destination alternate for the CTIA. Criteria used to determine this include Operating Hours Compatibility, Take-Off Performance, Landing Performance, Apron/Taxiway Strength at Maximum Taxi Weight and the ICAO's requirements for Rescue and Fire Fighting Services. The said Study confirmed that based on the analysis of meteorological and weather data over the last twenty (20) years, the expanded CWA is very well suited to serve as a destination alternate or fuel ERA aerodrome.

In light of the above, it was concluded that the expanded CWA will enable economic benefits and complement the CTIA by boosting the viability, economics and feasibility of routes into the said airport. The two airports can therefore co-exist within the City of Cape Town.

3.24 Service Requirements

Wastewater (Effluent) Treatment:

A wastewater treatment plant to treat sewage generated by the development proposal will be established. The treated effluent will be reused on site for irrigation- and biodigester purposes. This will reduce the need to use potable water on the site. The required authorisation in terms of the National Water Act, 1998 (Act No. 36 of 1998) must be obtained from the Competent Authority.

Electricity:

The site currently contains an existing 66 kilovolts Eskom supply, which will be upgraded to support the expanded CWA. According to the correspondence from Eskom (dated 4 March 2025), capacity exists to provide a 5-MVA load. The bulk mains electrical supply will be connected to the Eskom Grid via an overhead 66,000- Volt three cable. Mini-substations will be established around the site, allowing for site-wide distribution. The final load requirements will be achieved over time and be supported with the installation of renewable energy sources, *i.e.*, Solar PV and biodigester, on the site. Biogas production will be continuous and store gas in gas bladders protected by inflated domes.

Provisions will be made for battery energy storage in terms of the Solar PV facility. This will be in the form of containerised outdoor enclosures located close to the PV Power Source(s).

Water:

Potable water will be provided through treated groundwater abstracted from boreholes located on the site and supplemented by the City of Cape Town. According to the Borehole Yield and Quality Testing Report (dated 14 April 2022 and compiled by GEOSS South Africa (Pty) Ltd), groundwater will be treated at a new treatment facility proposed on the site. The National DWS will consider the results contained in the Geohydrological Assessment Report (dated 28 February 2025 and compiled by GEOSS South Africa (Pty) Ltd) that accompanied the groundwater use license / Water Use License Application.

The correspondence from the City of Cape Town (dated 9 July 2025) confirms that there is sufficient infrastructure capacity to support the development proposal. The City of Cape Town's bulk supply system has sufficient water resources, treatment, bulk storage and conveyance capacity to supply the expanded CWA with the estimated average daily demand of 399.0kl/day. The integration of Treated Sewage Effluent ("TSE") from the on-site wastewater treatment plant for all non-potable uses will significantly reduce the burden on potable water resources. The combined potable water supply from the City of Cape Town and the on-site borehole fulfills the projected daily demand for potable water.

Sewage Management and Treatment:

Various options for sewage management and treatment were considered. Ultimately, the preferred option entails sewage discharge to be treated via a dual-treatment approach. Sewage will be diverted through a pump system to a proposed on-site package treatment plant. This plant will treat the sewage to a standard suitable for non-potable water use, such as irrigation or flushing. The remaining sewage will be directed to the nearby Fisantekraal WWTW for further treatment and disposal. The correspondence from the City of Cape Town (dated 13 May 2025) indicated that this approach is feasible and in terms of wastewater treatment requirements, the Fisantekraal WWTW has sufficient unallocated capacity to accommodate additional influent.

The key components to form part of the sewage management and treatment includes, internal sewer network to convey sewage, a lifting station to divert a portion of sewage to a package sewage treatment plant, a primary sewer pump station to direct the remaining sewage to the Fisantekraal WWTW via a pump and rising main, a sludge processing area, an emergency overflow pond and an emergency overflow to the primary sewer pump station from the package treatment plant. The wastewater treatment from the on-site package treatment plant itself is potential source of pollution. In order to limit this, it was decided that instead of using chicken manure as a feedstock, the feed stream will be composed of treated effluent from the WWTW, cultivated biomass / energy crop and organic waste from the site.

Solid Waste Management:

Waste at various stages of construction and operation will be generated. A Waste Management Plan will be implemented to manage the waste generated on-site according to the applicable requirements.

'Waste' from the biodigester plant comprises 'liquid fertilizer', which will be distributed to local farms within a 40km radius of the plant.

A Waste Management Plan, which outlines the waste streams during the construction and operational phases, monitoring requirements, responsibilities associated with waste management on site and potential impacts will be implemented. The Waste Management Plan will further ensure that the requirements, as per the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) are adhered to.

During the construction phase, waste generated will, as far as possible, be re-used and recycled in order to reduce waste to landfill. The need to reduce, reuse and recycle waste forms part of the provisions of the EMP. The same approach will be implemented during the operational phase with respect to the reduce, reuse and recycling waste, as per the relevant provisions of the EMP.

Waste trucks entering and exiting the site will potentially emit foul-smelling odours. In addition, active composting, organic piles emit volatile compounds. Hence, essential measures forms part of this Decision in order to mitigate such impacts (refer to Condition 24). Measures are similarly be implemented to ensure that waste management mitigates dust, noise and visual impacts.

The correspondence from the City of Cape Town (dated 13 May 2025) indicated that sufficient unallocated capacity exists to accept, collect, and dispose of all types of waste to a designated licensed landfill site.

Stormwater Management:

Existing drainage routes and attenuation ponds will be retained and incorporated into the stormwater management system. New stormwater management infrastructure comprises of a stormwater drainage network that is based on a dual stormwater system, consisting of a major and a minor network, conveying stormwater generated on site via pipes and overland flow routes, dry attenuation ponds with engineered layer works and a wet detention pond. In order to address the potential attraction of avifauna to the ponds, all ponds have been designed as dry ponds, except for one, i.e., the rehabilitated quarry, which has a permanent water body. Other options to further mitigate any impacts in this regard include, *inter alia*, covering the exposed water surface area (rehabilitate quarry) and maintaining consistency in planting vegetation on either side of the ponds to discourage bird movement between ponds. Measures will be implemented to ensure all ponds are suitably maintained and appropriately monitored.

The minor stormwater system will include open drains, an underground piped network complete with channels, inlet catchpits, oil separators, manholes and outlet structures. The major stormwater system will comprise of roads and on-site overland flow paths, which will operate in conjunction with the minor system.

The overland flow routes on the site will be designed to safely convey the 1:100-year storm event towards the ponds situated along the boundary of the site. From there, formal overland escape routes, in the form of pond overflows, will be designed to convey peak runoff from the 1:100-year storm, which cannot be handled by the stormwater system before discharging into the adjacent infrastructure.

A Stormwater Management Plan approved by the City of Cape Town must be implemented to adequately manage stormwater and avoid, or if not possible, mitigate the associated stormwater-related impacts (refer to Condition 37).

Fuel requirements:

A new fuel depot with a total storage capacity of approximately 2 000m³ (to ensure 7 days of buffer stock) will be located, as close as possible, to the apron stands and include service roads for road tankers to limit interactions with- and impact on airport traffic. Standard measures to mitigate the associated impacts that will be implemented include, *inter alia*, the use of concrete-bunded areas for secondary containment and double

walled tanks. In addition, a retail fuel service station will be developed with a total storage capacity of approximately 92m³ (petrol and diesel) together with the associated infrastructure.

3.25 Traffic Impacts

The site is well-served by an extensive road network, which connects to both north-south and east-west highways, providing efficient routes to the broader Western Cape. By distributing passenger traffic across two airports, road congestion around the airports would be reduced, making it easier for passengers to reach their flights on time. Future land use projections and approved future planned developments in the immediate surrounds of the site influence future Municipal road network. The expanded CWA will require the amendment of east-west links traversing the site and the links in the north of the site.

The various access opportunities to the road network system that are available include, (a) the existing Melish Road (OP 6/8) connection onto Lichtenberg Road, (b) the future Class 3 Lucullus Road extension, and (c) the future Class 3 Melish Road extension through the Bella Riva residential development. It was determined that option (a) is the most viable, since the other access opportunities will require more co-operation and agreements between relevant and affected landowners. The existing Melish Road (OP 6/8) connection onto Lichtenberg Road will take place in a phased approach. The area east of the new runway will be accessed from Lichtenberg Road (R312 Regional Road).

According to the Transport Impact Assessment Report (dated June 2025 and compiled by Innovative Transport Solutions) to gain specific trip generation rates, cordon counts were conducted around the CTIA. Based on these cordon counts, 136.34 trips per million annual airline passengers were calculated for weekday AM peak hour and 253.64 trips per million annual airline passengers were calculated for weekday PM peak hour.

Taking into consideration the horizon years for the development proposal, it was estimated that by 2032, 601 in total (467 in / 134 out) weekday AM peak hour trips and 1 199 in total (659 in / 540 out) weekday PM peak hour will be generated. By 2050, 1 314 in total weekday AM peak hour: (1 004 in / 310 out) and 228 total (1 151 in / 1 077 out) weekday PM peak hour trips will be generated.

Based on these figures and the existence of multiple access points to the site, it is estimated that single-lane roads with dedicated turning lanes should be able to accommodate the vehicle demand. However, multi-lane roads must be constructed for the main public circulation route for more ideal vehicular flow and planning of road reserves should make allowance for dualling when necessary. As with other airports, it is expected that public transport to- and from the expanded CWA will utilise 'drop-and-go' routes linking with the public transport.

In terms of the internal road requirements and parking, two lanes per direction, includes controlled access points to restricted areas and space for U-turns in front of any controlled access points. The main road circulating adjacent to the terminals and parking areas will include dedicated public transport, e-hailing and passenger vehicle 'stop-and-go' zones. A minimum of 1 705 parking bays will be provided for Phase 1 and the provision of additional parking bays thereafter will be provided in response to increased demand. Parking will be provided in various restricted areas of the expanded CWA, as and when required.

The EMPr contains provisions to mitigate and manage the associated traffic impacts during the construction phase. It is particularly required that deliveries be scheduled outside peak hours to prevent congestion during peak periods. It must at the same time be noted that material will largely be sourced from existing quarries (mostly located west of the site), whilst most of the earthworks will be done on-site to balance cut and fill areas.

Based on the above, the said Assessment Report concluded that the expanded CWA can be approved from a transport point of view.

3.26 Other Aspects

The EMPr contains other standard provisions such most notably best practices to ensure that construction impacts relating to traffic, visual, health and safety, waste and socio-economic impacts are adequately managed and mitigated.

3.27 Socio-economic Impacts

According to the Socio-Economic Impact Assessment Report (dated 30 May 2025 and compiled by Dr. Jonathan Bloom), the most significant socio-economic benefit from the development proposal is the anticipated contribution to the aviation industry in the Western Cape. More specially, an estimated R8,9 billion in capital investment could generate R23,1 billion in new business sales, which could add R8,8 billion (net of the import leakage) to the Gross Geographic Product ("GGP") of the Western Cape economy during the construction phase alone. During an initial 20-year operational period, an estimated R36,1 billion in nominal terms could generate R76,1 billion in new business sales.

The conversion of the land particularly where wheat production takes place is expected to reduce employment from 20 to 12 permanent opportunities. This impact was not deemed significant due to new employment opportunities that expanded CWA will provide and the capital injection into the remainder of the farm during both construction- and operational phases. In this regard, the development proposal could sustain approximately 32 433 (direct, indirect, and induced) employment opportunities during construction, including ongoing capital expenditure upgrades over a twenty (20) year period. This could increase household incomes by R3,8 billion over 22 years. During the initial 20 years operational phase, the development proposal could sustain about 102 732 direct, indirect, and induced employment opportunities, adding R17,7 billion in household income. According to the said Assessment Report, the positive impacts include skills development and training, small business development and capacity building in the local area. In terms of the provisions of the EMPr, benefits of these positive impacts will be aimed at enhancing gender equality through the recruitment processes and appointment of local contractors during the tender process.

During the construction phase, positive impacts includes (a) creating new employment opportunities (as mentioned above) and (b) economic income.

During the construction phase, negative impacts include (a) increased vehicular traffic flows, (b) nuisance factors, such as dust and noise, (c) an influx of job seekers and (d) potential increase in local crime.

During the operational phase, positive impacts include (a) creating new employment opportunities (as mentioned above), (b) economic income, (c) creating new business opportunities, and (d) revenue accruing to local authorities.

During the operational phase, the negative impacts include (a) vehicular traffic flows, (b) nuisance factors, such as dust and noise, (c) potential increase in local crime, (d) risk of new or expanded informal settlements (potential), (e) altered sense of place, (f) impacting nearby farming and business operations (g) affects surrounding land values, and (h) increased demand for bulk infrastructure and servicing.

Whilst potential negative impacts have been identified, the said Assessment Report determined that with proper management and the implementation of all mitigation measures recommended by specialists, the socio-economic impact is deemed to be of 'Low' to 'Moderate' significance. According to the said Assessment Report, the analysis indicates that the socio-economic benefits would outweigh the potential socio-economic costs of the expanded CWA.

The development proposal will result in both negative and positive impacts.

Negative Impacts include the following:

- Temporary nuisance related impacts during the construction phase;
- Loss of and impact on aquatic features;
- Loss of and impact on biodiversity features;
- Impact on faunal species;
- Increased demand for services;
- Increased traffic to and from the site;
- Increased air emissions;
- Increased noise levels;
- Increased lighting in the local area;
- Additional market share in the aviation sector;
- Additional activity in the controlled airspace;
- Conversion of agricultural land;
- Increased anthropogenic activities in and around the site;
- Visual alteration of the site; and
- Alteration of the local 'Sense of Place'.

Positive Impacts include the following:

- Employment opportunities;
- Various socio-economic spinoffs;
- Varied/additional air travel options;
- Infrastructure to support the travel and tourism industry;
- Fiscal contribution towards the local economy;
- Fiscal contribution towards the regional economy; and
- Beneficial activation of a partially fallow site.

4. National Environmental Management Act, 1998 (Act No. 107 of 1998) Principles

The National Environmental Management Principles (set out in Section 2 of the NEMA, which apply to the actions of all Organs of State, serve as guidelines by reference to which any Organ of State must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment), *inter alia*, provides for:

- the effects of decisions on all aspects of the environment to be taken into account;
- the consideration, assessment and evaluation of the social, economic and environmental impacts of activity (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment;
- the co-ordination and harmonisation of policies, legislation and actions relating to the environment;
- the resolving of actual or potential conflicts of interest between Organs of State through conflict resolution procedures; and
- the selection of the best practicable environmental option.

5. Conclusion

In view of the above, the NEMA principles, compliance with the conditions stipulated in this Environmental Authorisation, and compliance with the EMP, the Competent Authority is satisfied that the authorised Listed Activities will not conflict with the general objectives of Integrated Environmental Management stipulated in Chapter 5 of the NEMA and that any potentially detrimental environmental impacts resulting from the undertaking of the Listed Activities can be mitigated to acceptable levels.

-----END-----

Appendix A: The obstacles that must be clearly marked with day- and night markings:

SURFACE	TARGET	OBSTACLE	PENETRATION	LATITUDE	LONGITUDE	ELEVATION
Balked Landing	01	_RWY21 PP5	-15.043	S 33° 45' 32.9882"	E 018° 44' 10.2920"	124.161
Inner transitional	01	_HANGER_A1	-4.492	S 33° 46' 15.2485"	E 018° 44' 29.1453"	133.502
Inner transitional	01	_PP1	-9.011	S 33° 45' 54.6489"	E 018° 44' 22.1157"	126.789
Strip	01-19	_FUEL FARM	-10.055	S 33° 46' 15.8166"	E 018° 44' 31.0346"	130.433
Strip	01-19	_HANGER_2	-5.676	S 33° 46' 13.9655"	E 018° 44' 29.9791"	125.507
Strip	01-19	_HANGER_A1	-13.381	S 33° 46' 15.2485"	E 018° 44' 29.1453"	133.502
Strip	01-19	_MET STATION	-14.495	S 33° 46' 04.8552"	E 018° 44' 23.1048"	131.535
Strip	01-19	_PP1	-12.493	S 33° 45' 54.6489"	E 018° 44' 22.1157"	126.789
Strip	01-19	_PP2	-11.716	S 33° 45' 55.5070"	E 018° 44' 23.9162"	126.341
Strip	01-19	_RWY21 PP2	-12.826	S 33° 45' 34.6972"	E 018° 44' 18.0334"	121.635
Strip	01-19	_RWY21 PP3	-14.229	S 33° 45' 34.0683"	E 018° 44' 15.1213"	122.707
Strip	01-19	_RWY21 PP4	-15.732	S 33° 45' 33.5537"	E 018° 44' 12.8416"	123.945
Strip	01-19	_RWY21 PP5	-16.242	S 33° 45' 32.9882"	E 018° 44' 10.2920"	124.161
Strip	01-19	_RWY21_TREE1	-25.23	S 33° 45' 44.8538"	E 018° 44' 18.5602"	136.744
Strip	01-19	_T64_BLD	-7.88	S 33° 45' 53.9976"	E 018° 44' 22.6102"	122.033
Strip	01-19	_T65_BLD	-7.875	S 33° 45' 51.4390"	E 018° 44' 19.5945"	121.182
Strip	01-19	_TREE_1	-14.034	S 33° 46' 16.9969"	E 018° 44' 32.0501"	134.781
Strip	01-19	_TREE_2	-16.232	S 33° 46' 16.9874"	E 018° 44' 32.1565"	136.983
Strip	01-19	_WINDSOCK MID	-9.089	S 33° 46' 19.7678"	E 018° 44' 25.8315"	130.212
Transitional	01	_HANGER_3	-6.551	S 33° 46' 14.7972"	E 018° 44' 32.4135"	129.829
Transitional	01	_PP3	-10.472	S 33° 45' 55.9201"	E 018° 44' 25.9506"	126.209
Transitional	01	_RWY21 PP1	-4.867	S 33° 45' 35.3422"	E 018° 44' 20.9663"	119.841
Transitional	01	_TANK_2	-0.22	S 33° 46' 13.7969"	E 018° 44' 34.6868"	132.567
Transitional	01	_TREE_3	-8.038	S 33° 46' 17.0056"	E 018° 44' 34.0187"	135.272
Transitional	01	_WATER TANK	-2.685	S 33° 46' 11.0727"	E 018° 44' 32.7418"	130.280
Transitional	01	_HANGER_A4	-4.349	S 33° 46' 12.4504"	E 018° 44' 31.5988"	126.649
Transitional	01	_OFFICE	-5.433	S 33° 46' 11.9595"	E 018° 44' 31.7976"	128.865
Balked Landing	19	_PP1	-1.249	S 33° 45' 54.6489"	E 018° 44' 22.1157"	126.789
Balked Landing	19	_RWY21_TREE1	-21.698	S 33° 45' 44.8538"	E 018° 44' 18.5602"	136.744
TOFPA	19	_W_RESERVOIR	-3.994	S 33° 47' 33.2716"	E 018° 44' 46.1067"	151.944
Transitional	19	_HANGER_3	-6.551	S 33° 46' 14.7972"	E 018° 44' 32.4135"	129.829
Transitional	19	_PP3	-10.472	S 33° 45' 55.9201"	E 018° 44' 25.9506"	126.209
Transitional	19	_RWY21 PP1	-4.867	S 33° 45' 35.3422"	E 018° 44' 20.9663"	119.841
Transitional	19	_TANK_2	-0.22	S 33° 46' 13.7969"	E 018° 44' 34.6868"	132.567
Transitional	19	_TREE_3	-8.038	S 33° 46' 17.0056"	E 018° 44' 34.0187"	135.272

Transitional	19	_WATER TANK	-2.685	S 33° 46' 11.0727"	E 018° 44' 32.7418"	130.280
Transitional	19	_HANGER_A4	-4.349	S 33° 46' 12.4504"	E 018° 44' 31.5988"	126.649
Transitional	19	_OFFICE	-5.433	S 33° 46' 11.9595"	E 018° 44' 31.7976"	128.865
Take-off Climb	14	_RWY32_TREE4	-11.374	S 33° 46' 28.5783"	E 018° 44' 52.6322"	141.078
Take-off Climb	14	_RWY32_TREE5	-4.528	S 33° 46' 28.3862"	E 018° 44' 53.6418"	135.288
Take-off Climb	14	_RWY32_TREE6	-2.914	S 33° 46' 28.0738"	E 018° 44' 55.0798"	135.154
TOFPA	14	_RWY32 F1	-1.487	S 33° 46' 26.0294"	E 018° 44' 49.0623"	126.269
TOFPA	14	_RWY32_TREE2	-15.309	S 33° 46' 28.8997"	E 018° 44' 50.7390"	141.005
TOFPA	14	_RWY32_TREE3	-15.126	S 33° 46' 28.7279"	E 018° 44' 51.7451"	141.078
TOFPA	14	_RWY32_TREE4	-14.901	S 33° 46' 28.5783"	E 018° 44' 52.6322"	141.078
TOFPA	14	_RWY32_TREE5	-8.857	S 33° 46' 28.3862"	E 018° 44' 53.6418"	135.288
TOFPA	14	_RWY32_TREE6	-8.368	S 33° 46' 28.0738"	E 018° 44' 55.0798"	135.154
TOFPA	14	_RWY32_TREE1	-9.958	S 33° 46' 29.1705"	E 018° 44' 49.1117"	135.239
Strip	14-32	_RWY32 F1	-1.679	S 33° 46' 26.0294"	E 018° 44' 49.0623"	126.269
Transitional	14	_TREE_1	-2.608	S 33° 46' 16.9969"	E 018° 44' 32.0501"	134.781
Transitional	14	_TREE_2	-4.519	S 33° 46' 16.9874"	E 018° 44' 32.1565"	136.983
Transitional	14	_WINDSOCK MID	-0.394	S 33° 46' 19.7678"	E 018° 44' 25.8315"	130.212
Approach	32	_RWY32_TREE4	-11.374	S 33° 46' 28.5783"	E 018° 44' 52.6322"	141.078
Approach	32	_RWY32_TREE5	-4.528	S 33° 46' 28.3862"	E 018° 44' 53.6418"	135.288
Approach	32	_RWY32_TREE6	-2.914	S 33° 46' 28.0738"	E 018° 44' 55.0798"	135.154
Transitional	32	_RWY32_TREE2	-9.558	S 33° 46' 28.8997"	E 018° 44' 50.7390"	141.005
Transitional	32	_RWY32_TREE3	-12.119	S 33° 46' 28.7279"	E 018° 44' 51.7451"	141.078
Transitional	32	_TREE_1	-2.608	S 33° 46' 16.9969"	E 018° 44' 32.0501"	134.781
Transitional	32	_TREE_2	-4.519	S 33° 46' 16.9874"	E 018° 44' 32.1565"	136.983
Transitional	32	_WINDSOCK MID	-0.394	S 33° 46' 19.7678"	E 018° 44' 25.8315"	130.212
Inner Horizontal	FAWN	_RWY01_PYLON MID1	-6.241	S 33° 48' 03.3797"	E 018° 45' 25.0766"	145.591
Inner Horizontal	FAWN	_RWY01_PYLON MID2	-10.101	S 33° 48' 03.9818"	E 018° 45' 09.9010"	149.451
Inner Horizontal	FAWN	_RWY01_PYLON MID3	-7.808	S 33° 48' 04.5311"	E 018° 44' 56.6150"	147.158
Inner Horizontal	FAWN	_RWY32_TREE2	-1.655	S 33° 46' 28.8997"	E 018° 44' 50.7390"	141.005
Inner Horizontal	FAWN	_RWY32_TREE3	-1.728	S 33° 46' 28.7279"	E 018° 44' 51.7451"	141.078
Inner Horizontal	FAWN	_RWY32_TREE4	-1.728	S 33° 46' 28.5783"	E 018° 44' 52.6322"	141.078
Inner Horizontal	FAWN	_STEEL TANK	-3.989	S 33° 46' 48.8511"	E 018° 43' 58.7999"	143.339
Inner Horizontal	FAWN	_W_RESEVOIR	-12.594	S 33° 47' 33.2716"	E 018° 44' 46.1067"	151.944
Conical	FAWN	_TRANS_1 TWR	-83.139	S 33° 47' 21.1688"	E 018° 41' 46.3120"	247.647
Conical	FAWN	_TRANS_2 TWR	-87.374	S 33° 47' 14.2176"	E 018° 41' 41.2943"	254.510
Conical	FAWN	_TRANS_3 TWR	-81.581	S 33° 47' 18.4075"	E 018° 41' 32.9621"	260.895

From: <amanda@phsconsulting.co.za>

Date: Thu, 30 Oct 2025 at 10:59

Subject: NOTIFICATION - ENVIRONMENTAL AUTHORISATION GRANTED FOR
PROPOSED EXPANSION OF CAPE WINELANDS AIRPORT (DEA&DP ref:
16/3/3/2/A5/20/2046/24)

To: <amanda@phsconsulting.co.za>

Dear Registered Interested and Affected Party,

Notice is hereby given, in terms of the National Appeal Regulations, 2025, that Environmental Authorisation (EA) was granted and issued on 27 October 2025 by the Western Cape Government, Environmental Affairs and Development Planning (DEA&DP) for the Proposed Expansion of the Existing Cape Winelands Airport on P10 of Farm 724, RE of Farm 724, P23 of Farm 724, P7 of Farm 942, RE of Farm 474, P3 of Farm 474 and P4 of Farm 474, Fisantekraal, Durbanville.

The Environmental Authorisation (EA) is attached to this email and available on our website at download link <https://phsconsulting.co.za/proposed-expansion-of-cape-winelands-airport/>, and a hard copy has been lodged at the Fisantekraal Public Library (021 444 9259). Please refer to the attached letter for more detail on the EA and the appeal process.

Best wishes

Amanda

Amanda Fritz-Whyte

BSc; BSc (Hons) Geology; MSc Water Resource Management

Fellow Member WISA

Lead: Climate Change Division WISA

Member IAIAAsa

Registered Environmental Assessment Practitioner: Number 2019/367 (EAPASA)

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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.

Celine Oates

From: Celine Oates
Sent: Wednesday, November 19, 2025 11:18 PM
To: 'd.cloete@capewinelands.aero'
Cc: Richard Summers; Reception – Richard Summers Inc.; Clarice Arendse; Shreea Maharaj
Subject: RE: APPEAL IN TERMS OF SECTION 43 OF NEMA AGAINST THE ENVIRONMENTAL AUTHORISATION GRANTED FOR THE DEVELOPMENT OF THE CAPE WINELANDS AIRPORT UNDER DEADP REFERENCE NUMBER 16/3/3/2/A5/20/2046/24
Attachments: RESOLUTION OF DIRECTORS - Garden Cities.pdf; RS Inc_Garden Cities Appeal Statement_19.11.2025.pdf; Annexure A_EA.pdf; Annexure B_Notification of EA_2.pdf

Dear Applicant

We refer to the above matter and confirm that we act on behalf of the Garden Cities NPC (RF).

We hereby notify you of the appeal against the abovementioned environmental authorisation, and attach hereto the following documentation in this regard:

1. A Resolution of Directors of the Garden Cities NPC (RF);
2. RS Inc Appeal Statement on behalf of Garden Cities NPC (RF) dated 19 November 2025; and
3. Annexures A and B.

We shall be most grateful if you would confirm receipt hereof.

Kind regards,

Celine Oates
RICHARD SUMMERS INC.
Candidate Attorney



Office +27 21 891 4402

Mobile +27 71 868 8101

Unit 126, Victoria Junction, 57 Prestwich Street, De Waterkant, Cape Town

RESOLUTION OF DIRECTORS GARDEN CITIES NPC (RF)

I, the undersigned, John William Matthews, duly authorised Director of Garden Cities NPC (RF) (Registration Number 1928/000607/08) ("the Company") by General Resolution adopted by the Board of Directors hereby adopt the following resolution in accordance with the provisions of section 74 of the Companies Act 71 of 2008, as amended, and the Memorandum of Incorporation of Garden Cities NPC (RF). The Resolution shall be of the same force and effect as if it had been approved by way of voting at a meeting of the Directors of the Company duly convened, constituted and held.

1. GENERAL

- 1.1. The Company is assigning authority to Richard Summers Incorporated (Registration No. 2017/536164/21) to appeal against the granting of an Environmental Authorisation 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 existing 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.

2. RESOLUTION

IT IS RESOLVED THAT:

- 2.1. Richard William Summers (Identity Number: 730105 5065 085) of Richard Summers Incorporated be and is hereby authorised, on behalf of Garden Cities NPC (RF), to do or cause all such things to be done, to sign all documentation as may be necessary, to give effect to the abovementioned appeal process;
- 2.2. Any actions which have thus far been taken in relation to giving effect to this written resolution be and hereby are retrospectively approved and ratified in their entirety; and
- 2.3. This resolution shall constitute a Resolution in writing for the purposes of the Memorandum of Incorporation of the Company.

John William Matthews



Name:

SIGNED AT Edgemead ON THIS 19 DAY OF November
2025.