



DRAFT BASIC ASSESSMENT REPORT




**The Proposed Establishment of a
Hazardous Materials Storage Area
within the Existing Pepkor Distribution
and Logistics Facility, ERF 281
Cliffdale, Keystone Park,
Hammarsdale, eThekweni Municipality**

GD PROJECT NO.:	GDE164
DEDEA REF. NO.:	TBC
APPLICANT:	Pepkor Trading (Pty) Ltd
DATE:	23 November 2022

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EXECUTIVE SUMMARY

The Applicant, Pepkor Trading (Pty) Ltd, wishes to obtain Environmental Authorisation to establish a Hazardous Storage Area within the existing Pepkor Distribution and Logistics Facility located on Platform 11, ERF 281 Cliffdale, Keystone Park, Hammarsdale, KwaZulu-Natal. The property is located in Hammarsdale alongside the N3 Highway, at GPS Coordinates: 29° 45' 43.26" S and 30° 39' 49.53" E. The site is currently zoned as Light Industrial.

The Applicant proposes installing a hazardous storage area of approximately 382m³ within the existing facility, containing racking of approximately 332 pallets, less than 50m³ of diesel generators and fire pumps. The aboveground and bunded area will contain 110% of the volume of contents. This will be a temporary storage area between distribution centres. Examples of the products that will be stored include antiseptic liquids, bleach, hand sanitisers, nail polish, deodorants, mouthwash, etc. These types of products have been categorised in terms of the following categories: Class 2 Flammable Gas, Class 3 Flammable Liquids, Class 4 Flammable Solids, Class 6 Toxic Substances, Class 8 Corrosive Substances and Class 9 Miscellaneous Substances.

In terms of the National Environmental Management Act, certain Listed Activities are specified for which a Basic Assessment (GNR 327) is required. The proposed development requires a Basic Assessment process to be conducted.

The main issues, which have been raised to date, are:

- Measures to safeguard hazardous material storage safely.
- Specifics of hazardous materials that will be stored.
- Risks of theft / looting of the products being stored.

The key mitigation measures which have been identified to date, are:

- The storage area must be marked clearly with appropriate warning signs.
- Precautionary measures must be undertaken, such as having adequate fire prevention equipment available, evacuation routes and plans for high-traffic areas and fire extinguishers which must be easily accessed.
- The site must be well secured to minimise risks of theft / looting of the products being stored.
- Hazardous materials must be stored and transported appropriately. Some types of hazardous materials must not be exposed to excessive heat and must be stored in fireproof containers.
- Any sources of ignition that may be a risk to starting a fire must be removed.
- Stormwater infrastructure and structures must be monitored and maintained on a regular basis.
- Waste generation must be minimised and waste must be managed in an environmentally responsible manner and in accordance with the waste management hierarchy.
- All workers on the jobsite must have access to the Material Safety Data Sheet (MSDS) and be trained to recognise the hazards and proper procedures associated with each hazardous material.

There are minimal potential ecological impacts associated with the proposed activities given that the activity will take place on a transformed site within an existing warehouse which is not within close proximity to any sensitive environments. The Environmental Assessment Practitioner (EAP) concludes that no fatal flaws have been identified during the environmental process and provided the Environmental Management Programme (EMPr) and recommendations made in this Report are strictly adhered to, there must be no significant, detrimental impacts on the environment.

TABLE OF CONTENTS

1	PROJECT ACTIVITY AND DESCRIPTION.....	14
1.1	Project Title	14
1.2	Listed Activities	14
1.3	List of Legislation, Policies and / or Guidelines that are relevant to the application	14
1.4	SG 21 Digit Code(s) of the Properties	16
1.5	Physical Address & Farm Name.....	16
1.6	Co-ordinates of the Property	16
1.7	Detailed Project Description of the Activities to be undertaken.....	17
	<i>1.7.1 Site Description and Background</i>	<i>17</i>
	<i>1.7.2 Services and Access</i>	<i>22</i>
	<i>1.7.3 Site Photographs</i>	<i>24</i>
2	NEED AND DESIRABILITY	25
3	ALTERNATIVES.....	35
3.1	Alternatives Considered.....	35
4	PUBLIC PARTICIPATION PROCESS.....	36
4.1	Protection of Personal Information Act (POPIA, Act No 14 of 2013)	36
4.2	Interested and Affected Parties	36
4.3	Notification of the Proposed Development	36
4.4	Background Information Document	36
4.5	Public Information Session	36
4.6	Consultation with Competent Authority	37
4.7	Circulation of the Draft Basic Assessment Report	37
4.8	Comments & Response Register	37
	<i>4.8.1. Background Information Document Comments & Responses</i>	<i>38</i>
	<i>4.8.2 Pre-Application Meeting Comments & Responses.....</i>	<i>43</i>
	<i>4.5.2 Summary of Issues Raised</i>	<i>45</i>
5	POTENTIAL IMPACTS ON THE SOCIAL AND ECONOMIC ENVIRONMENTS.....	46
5.1	Local Economy and Employment Opportunities / Need and Desirability	46
5.2	Planning Initiatives	46
5.3	Cultural, Historical and Archaeological Resources	48
5.4	Surrounding Land Use and Aesthetics	48
5.5	Traffic, Roads and Access.....	48
5.6	Operational Activities, Noise and Dust	49
5.7	Safety and Security.....	49

6	POTENTIAL IMPACTS ON THE BIOPHYSICAL ENVIRONMENT	51
6.1	Topography	51
6.2	Climate	51
6.3	Climate Change	55
6.4	Geology and Soils	55
6.5	Biodiversity	56
7	SPECIALIST STUDIES: KEY FINDINGS AND RECOMMENDATIONS.....	57
7.1	Wetland Risk Assessment	57
7.2	Stormwater Management Plan	57
8	ASSESSMENT OF ENVIRONMENTAL IMPACTS.....	59
8.1	Impact Assessment Methodology	59
8.2	Impact Assessment	60
9	ENVIRONMENTAL MANAGEMENT PROGRAMME.....	70
10	POSITIVE AND NEGATIVE IMPLICATIONS OF THE PROPOSED DEVELOPMENT	71
10.1	Positive and Negative Implications of the Preferred Option – Hazardous Materials Storage Area.	71
10.2	Positive and Negative Implications of the 'No Go Option'	71
11	EAP RECOMMENDATIONS AND CONCLUSION.....	72
12	APPENDICES	73

FIGURES

Figure 1: Example of aboveground storage tank.	19
Figure 2: Locality Map of the Proposed Development Site.....	20
Figure 3: Aerial map of the Pepkor Hazardous Storage Facility and Surrounding Area, Hammarsdale, KwaZulu-Natal.....	21
Figure 4: Overall site layout plan with layout of services (Source: TC RPy Architects).....	23
Figure 5: KwaZulu-Natal SDF (August 2011). Site indicated by red polygon.	26
Figure 6: eThekweni Spatial Development Plan (eThekweni SDP 2015)	29
Figure 7: Mean Annual Precipitation in KwaZulu-Natal.	53
Figure 8: Mean Annual Precipitation in KwaZulu-Natal.	54

TABLES

Table 1: Contact Details of Applicant and Environmental Assessment Practitioner (EAP)	iii
Table 1: Contact Details of Applicant and Environmental Assessment Practitioner (EAP).	iii
Table 2: Applicable Listed Activities in terms of the NEMA: EIA Regulations, 2014 (as amended 2017 & 2021), for the proposed redevelopment activities.	14
Table 3: List of Legislation, Policies and / or Guidelines that are relevant to the application.	15
Table 4: Screening Tool Report Sensitivities for the site	31
Table 5: Comments & Responses on the BID.	38
Table 6: Comments & Responses from the Pre-Application Meeting.	43
Table 7: General gradient of the site.....	51

Table 8: Landform describing the site.....	51
Table 9: Groundcover of the site.....	51
Table 10: Summary of aspects used for assessing environmental impacts.....	59
Table 11: Assessment of potential impacts associated with the establishment of the proposed development.....	61
Table 12: Positive and negative implications of the proposed development	71
Table 13: Positive and negative implications of the 'No Go Option'.	71

APPENDICES

- Appendix A: Site Mapping & Layout Plans
- Appendix B: Draft Environmental Authorisation Application Form
- Appendix C: Public Participation Documents
 - Appendix C1: I&AP List
 - Appendix C2: Adverts
 - Appendix C3: Site Posters
 - Appendix C4: Background Information Document
 - Appendix C5: Consultation with DEDTEA
 - Appendix C6: Comments Received
 - Comments on the BID*
 - Comments on the DBAR*
- Appendix D: Specialist Reports & Declaration Forms
 - Appendix D1: Wetland Risk Assessment
 - Appendix D2: Stormwater Management Plan
- Appendix E: Environmental Management Programme (EMPr)
- Appendix F: EAP Documentation
 - Appendix F1: Environmental Assessment Practitioner Declaration
 - Appendix F2: Environmental Assessment Practitioners CV
 - Appendix F3: EAPASA Registration Certificate
- Appendix G: Other Information
 - Appendix G1: Screening Tool Report
 - Appendix G2: Product List
 - Appendix G3: Keystone Park Environmental Authorisation
 - Appendix G4: Ethekewini Air Quality Comment

LIST OF ACRONYMS & ABBREVIATIONS

BA	Basic Assessment
BAR	Basic Assessment Report
BID	Background Information Document
CA	Competent Authority
CBD	Central Business District
CER	Centre for Environmental Rights
DAFF	Department of Agriculture, Forestry and Fisheries
DARD	Department of Agriculture and Rural Development
DBAR	Draft Basic Assessment Report
DEA	Department of Environmental Affairs
DEA & DP	Department of Environmental Affairs and Development Planning
DEDTEA	KwaZulu-Natal Department of Economic Development, Tourism and Environmental Affairs
DEG	Digital Elevation Model
DoE	Department of Energy
DOJCD	Department of Justice and Constitutional Development
DoT	Department of Transport
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EAPASA	Environmental Assessment Practitioners Association of South Africa
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMF	Environmental Management Framework
EMPr	Environmental Management Programme
FBAR	Final Basic Assessment Report
GIS	Geographic Information Systems
GNR	Government Notice Regulation
HIA	Heritage Impact Assessment
I&AP	Interested and Affected Parties
IAIA	International Association for Impact Assessment
IDP	Integrated Development Plan
IEM	Integrated Environmental Management
IWMSA	Institute of Waste Management of Southern Africa
KZN	KwaZulu-Natal
MDGs	Millennium Development Goals
MPRDA	Mineral and Petroleum Resources Development Act
NDP	National Development Plan
NEMA	National Environmental Management Act
NEM:BA	National Environmental Management Biodiversity Act
NAM:PAA	National Environmental Management Protected Areas Act
NEM:WA	National Environmental Management Waste Act
NEM:WAA	National Environmental Management: Waste Amendment Act
NEM:AQA	National Environmental Management Air Quality Act
NFA	National Forests Act
NHRA	National Heritage Resources Act
NSDF	National Spatial Development Framework
NWA	National Water Act
OHSA	Occupational Health and Safety Act
PGDS	Provincial Growth and Development Strategy

PIS	Public Information Session
POPIA	Protection of Personal Information Act
PP	Public Participation
Pr.Sci.Nat.	Professional Natural Scientist
PSDP	Provincial Spatial Development Perspective
SAHRA	South African Heritage Resources Agency
SAIIEA	The South African Institute of International Affairs
SANBI	South African National Biodiversity Institute
SANS	South African National Standards
SDF	Spatial Development Framework
SIP	Strategic Integrated Project
SSAG	The Society of South African Geographers
UC	Urban Core
WISA	The Water Institute of Southern Africa
WUL	Water Use Licence

TERMINOLOGY

Term	Definition
Activity (Development)	An action either planned or existing that may result in environmental impacts through pollution or resource use. For the purpose of this report, the terms 'activity' and 'development' are freely interchanged.
Alternative	A possible course of action, in place of another, of achieving the same desired goal of the proposed project. Alternatives can refer to any of the following but are not limited to: site alternatives, site layout alternatives, design or technology alternatives, process alternatives or a no-go alternative.
Applicant	The project proponent or developer responsible for submitting an environmental application to the relevant environmental authority for environmental authorisation.
Biodiversity	The diversity of animals, plants and other organisms found within and between ecosystems, habitats, and the ecological complexes.
Construction	means the building, erection or establishment of a facility, structure or infrastructure that is necessary for the undertaking of a listed or specified activity but excludes any modification, alteration or expansion of such a facility, structure or infrastructure and excluding the reconstruction of the same facility in the same location, with the same capacity and footprint.
Cumulative Impacts	Impacts that result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities to produce a greater impact or different impacts.
Direct impacts	Impacts that are caused directly by the activity and generally occur at the same time and at the same place of the activity. These impacts are usually associated with the construction, operation or maintenance of an activity and are generally quantifiable.
Ecological Reserve	The Ecological Reserve specifies both the quantity and quality of water that must be left in the national water resource. The Ecological Reserve is determined for all major water resources in the different water management areas to ensure sustainable development. The water that is necessary to protect the water ecosystems of the water resource. It must be safeguarded and not used for other purposes.
Ecosystem	A dynamic system of plant, animal (including humans) and micro-organism communities and their non-living physical environment interacting as a functional unit. The basic structural unit of the biosphere, ecosystems are characterised by interdependent interaction between the component species and their physical surroundings. Each ecosystem occupies a space in which macro-scale conditions and interactions are relatively homogenous.
Environment	In terms of the National Environmental Management Act (NEMA) (Act No 107 of 1998) (as amended), "Environment" means the surroundings within which humans exist and that are made up of: <ul style="list-style-type: none"> a) the land, water and atmosphere of the earth; b) micro-organisms, plants and animal life; c) any part or combination of (a) or (b) and the interrelationships among and between them; and d) the physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and wellbeing.

Term	Definition
Environmental Assessment	The generic term for all forms of environmental assessment for projects, plans, programmes or policies and includes methodologies or tools such as environmental impact assessments, strategic environmental assessments and risk assessments.
Environmental Authorisation	An authorisation issued by the competent authority in respect of a listed activity, or an activity which takes place within a sensitive environment.
Environmental Assessment Practitioner	The individual responsible for planning, management and coordination of environmental impact assessments, strategic environmental assessments, environmental management programmes or any other appropriate environmental instrument introduced through the EIA Regulations.
Environmental Impact	A change to the environment (biophysical, social and/ or economic), whether adverse or beneficial, wholly or partially, resulting from an organisation's activities, products or services.
Environmental Impact Assessment	The process of identifying, predicting, evaluating and mitigating the biophysical, social, and other relevant effects of development proposals prior to major decisions being taken and commitments made.
Environmental Issue	A concern raised by a stakeholder, interested or affected parties about an existing or perceived environmental impact of an activity.
Environmental Management	The inclusion of environmental concerns in all stages of the development, so that the development is sustainable and does not detrimentally impact the environment.
Environmental Management Programme	A detailed plan of action prepared to ensure that recommendations for enhancing or ensuring positive impacts and limiting or preventing negative environmental impacts are implemented during the life cycle of a project. The EMP focuses on the construction phase, operation (maintenance) phase and decommissioning phase of the proposed project.
Expansion	Means the modification, extension, alteration or upgrading of a facility, structure or infrastructure at which an activity takes place in such a manner that the capacity of the facility or the footprint of the activity is increased.
Fatal Flaw	Issue or conflict (real or perceived) that could result in developments being rejected or stopped.
General Waste	Waste that does not pose an immediate hazard or threat to health or to the environment, and includes domestic waste, building and demolition waste, business waste, and inert waste.
Hazardous Waste	Waste that contains organic or inorganic elements or compounds that may, owing to the inherent physical, chemical or toxicological characteristics of that waste, have a detrimental impact on health and the environment.
Indirect impacts	Indirect or induced changes that may occur as a result of the activity. These types of impacts include all of the potential impacts that do not manifest immediately when the activity is undertaken or which occur at a different place as a result of the activity.
Integrated Environmental Management	A philosophy that prescribes a code of practice for ensuring that environmental considerations are fully integrated into all stages of the development and decision-making process. The IEM philosophy (and principles) is interpreted as applying to the planning, assessment, implementation and management of any proposal (project, plan, programme or policy) or activity – at local, national and international level – that has a potentially significant effect on the environment.

Term	Definition
	Implementation of this philosophy relies on the selection and application of appropriate tools for a particular proposal or activity. These may include environmental assessment tools (such as strategic environmental assessment and risk assessment), environmental management tools (such as monitoring, auditing and reporting) and decision-making tools (such as multi-criteria decision support systems or advisory councils).
Interested and Affected Party	For the purposes of Chapter 5 of the NEMA and in relation to the assessment of the environmental impact of a listed activity or related activity, means an interested and affected party contemplated in Section 24(4)(a)(v), and which includes – (a) any person, group of persons or organisation interested in or affected by such operation or activity; and (b) any organ of state that may have jurisdiction over any aspect of the operation or activity.
Mitigate	The implementation of practical measures designed to avoid, reduce or remedy adverse impacts or enhance beneficial impacts of an action.
No-Go Option	In this instance, the proposed activity would not take place, and the resulting environmental effects from taking no action are compared with the effects of permitting the proposed activity to go forward.
Rehabilitation	A measure aimed at reinstating an ecosystem to its original function and state (or as close as possible to its original function and state) following activities that have disrupted those functions.
Sensitive environment	Any environment identified as being sensitive to the impacts of the development.
Significance	Significance can be differentiated into impact magnitude and impact significance. Impact magnitude is the measurable change (i.e. magnitude, intensity, duration and likelihood). Impact significance is the value placed on the change by different affected parties (i.e. level of significance and acceptability). It is an anthropocentric concept, which makes use of value judgements and science-based criteria (i.e. biophysical, social and economic).
Stakeholder engagement	The process of engagement between stakeholders (the proponent, authorities and I&APs) during the planning, assessment, implementation and/or management of proposals or activities.
Sustainable Development	Development which meets the needs of current generations without hindering future generations from meeting their own needs.
Watercourse	Means: a) a river or spring; b) a natural channel or depression in which water flows regularly or intermittently; c) a wetland, lake or dam into which, or from which, water flows; and d) any collection of water which the Minister may, by notice in the Gazette, declare to be a watercourse as defined in the National Water Act, 1998 (Act No. 36 of 1998) and a reference to a watercourse includes, where relevant, its bed and banks.
Wetland	Means land which is transitional between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is periodically covered with shallow water, and which land in normal circumstances supports or would support vegetation typically adapted to life in saturated soil.

THE PROPOSED ESTABLISHMENT OF A HAZARDOUS MATERIALS STORAGE AREA WITHIN THE EXISTING PEPKOR DISTRIBUTION AND LOGISTICS FACILITY, ERF 281 CLIFFDALE, KEYSTONE PARK, HAMMARSDALE, ETHEKWINI MUNICIPALITY

1 PROJECT ACTIVITY AND DESCRIPTION

1.1 Project Title

The Proposed Establishment of a Hazardous Materials Storage Area within the Existing Pepkor Distribution and Logistics Facility, ERF 281 in Cliffdale, Keystone Park, Hammarsdale, eThekweni Municipality.

1.2 Listed Activities

In terms of the National Environmental Management Act (NEMA), Act 107 of 1998, and the Environmental Impact Assessment (EIA) Regulations of 2014 (as amended 2017 & 2021), published in Government Notice Regulation (GNR) 324, 325 and 327 of 2014 (as amended 2017 & 2021), certain Listed Activities require either a Basic Assessment (BA) Process (GNR 324 and GNR 327) or a Scoping and EIA Process (GNR 325) to be undertaken for Environmental Authorisation (EA). The proposed activities triggers the following Listed Activity which requires a BA Process to be undertaken (**Table 2**).

Table 2: Applicable Listed Activities in terms of the NEMA: EIA Regulations, 2014 (as amended 2017 & 2021), for the proposed redevelopment activities.

Indicate the number of the relevant Government Notice:	Activity No (s) (relevant notice): e.g. Listing notices 1, 2 or 3	Describe each listed activity as per the wording in the listing notices as well as per the proposed activity:
GNR 327	Activity 14: <i>"The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, or a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic meters or more but not exceeding 500 cubic meters."</i>	The activity is applicable as the Applicant proposes to store approximately 382 cubic meters of hazardous material.

1.3 List of Legislation, Policies and / or Guidelines that are relevant to the application

There are a number of significant sections of environmental and other legislation that need to be recognised and adhered to during this EA Process. Error! Reference source not found. below provides a list of legislation, policies and / or guidelines that are relevant to the application.

Table 3: List of Legislation, Policies and / or Guidelines that are relevant to the application.

Title of legislation, policy or guideline:	Administering authority:	Date:
eThekwini Metropolitan Municipality IDP	eThekwini Metropolitan Municipality	2022 / 2023
eThekwini Municipal Spatial Development Framework	eThekwini Metropolitan Municipality	2015 / 2016
eThekwini Municipal Spatial Development Plan	eThekwini Metropolitan Municipality	2015
The Municipal Systems Act (Act No. 32 of 2000)	South African Government	2000
The National Environmental Management Act (NEMA, Act No. 107 of 1998)	Department of Environmental Affairs (DEA)	1998
The Constitution of South Africa (Act No. 108 of 1996)	Department of Justice and Constitutional Development (DOJCD)	1996
Environmental Impact Assessment (EIA) Regulations promulgated under the NEMA	DEA	2017
Integrated Environmental Management (IEM) Information Series	DEA	2010
The National Water Act (NWA, Act No. 36 of 1998)	Department of Water and Sanitation (DWS)	1998
Water Services Act (Act No. 108 of 1997)	DWS	1997
National Heritage Resources Act (NHRA, Act 25 of 1999)	South African Heritage Resources Authority (SAHRA)	1999
KwaZulu-Natal Heritage Resources Act (Act No. 10 of 1997)	SAHRA	1997
National Road Traffic Act (Act No. 93 of 1996)	Department of Transport (DoT)	1996
The National Environmental Management: Waste Act (NEM: WA, Act No. 59 of 2008)	DEA	2008
The National Environmental Management: Waste Amendment Act (NEM: WAA, Act No. 26 of 2014)	DEA	2014
The Hazardous Substances Act (Act No. 15 of 1973)	South African Government	1973
The Occupational Health and Safety Act (OHSA, Act No. 85 of 1993)	South African Government	1993
The Mineral and Petroleum Resources Development Act (Act No. 28 of 2002)	South African Government	2002
The South African National Standard (SANS, 10103:2008): The measurement and rating of environmental noise with respect to annoyance and speech communication	SANS	2008
The National Environmental Management: Air Quality Act (NEM: AQ, Act No. 39 of 2004)	DEA	2004
The National Environmental Management: Biodiversity Act (NEM: BA, Act No. 10 of 2004)	DEA	2004
The Biodiversity Policy	South African National Biodiversity Institute (SANBI)	2021
KwaZulu-Natal Nature Conservation Management Act (Act No. 9 of 1997)	Centre for Environmental Rights (CER)	1997

Title of legislation, policy or guideline:	Administering authority:	Date:
EIA Guideline and Information Document Series: Guideline on Alternatives	Provincial Government of the Western Cape: Department of Environmental Affairs and Development Planning (DEA&DP)	2010
EIA Guideline and Information Document Series: Guideline on Public Participation	Provincial Government of the Western Cape: DEA&DP	2011
EIA Guideline and Information Document Series: Guideline on Need and Desirability	Provincial Government of the Western Cape: DEA&DP	2010
EIA Guideline and Information Document Series: Information Document on Generic Terms of Reference for EAPs and Project Schedules	Provincial Government of the Western Cape: DEA&DP	2010
Integrated Environmental Guideline: Guideline on Need and Desirability	DEA	2017
Public Participation Guideline in terms of the NEMA (1998) and the EIA Regulations (2017)	DEA	2017
South African National Standard (SANS) 10 108 The classification of hazardous locations and the selection of apparatus for use in such locations.	SABS	2005
South African National Standard (SANS) 10 131 Section 5.	SABS	2004

1.4 SG 21 Digit Code(s) of the Properties

N	0	F	T	0	0	6	2	0	0	0	0	0	2	8	1	0	0	0	0	0
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1.5 Physical Address & Farm Name

Address	ERF 281, Cliffdale, Keystone Park
Farm Name	N/A
Town	Hammarsdale
Postal Code	6910

1.6 Co-ordinates of the Property

Corner/Position	Latitude (S)	Longitude (E)
Corner 1	29° 45' 43.00" S	30° 39' 49.11" E
Corner 2	29° 45' 43.05" S	30° 39' 49.97" E
Corner 3	29° 45' 43.57" S	30° 39' 49.97" E
Corner 4	29° 45' 43.50" S	30° 39' 49.11" E

1.7 Detailed Project Description of the Activities to be undertaken

1.7.1 Site Description and Background

The Applicant, Pepkor Trading (Pty) Ltd., wishes to obtain Environmental Authorisation (EA) to establish a hazardous storage area within the existing Pepkor Distribution and Logistics Facility, ERF 281 Cliffdale, Keystone Park, Hammarsdale, eThekweni municipality. The property is located in Hammarsdale alongside the N3 Highway, at GPS Coordinates: 29° 45' 43.26" S and 30° 39' 49.53" E. The site is currently zoned as Light Industrial.

Refer to **Figure 1** for the design drawings for the proposed storage area. Refer to **Figure 2** for a Locality Map and **Figure 3** for a Site Layout Plan. High Resolution maps and plans are provided in **Appendix A**.

The Hazardous Materials Storage area is proposed to be established within the Pepkor Distribution and Logistics Facility. Within this facility, some sections have construction that is completed whilst some sections are currently under construction. There will be no construction activities associated with the activity being applied for which is a storage area. This storage area is found within the larger warehouse where activities are still under construction. This Facility is authorised under an existing Environmental Authorisation (EA) issued to Keystone Park cc for the development of the Keystone Light Industrial, Warehousing and Logistics Park (Refer to **Appendix G3**). The issued EA authorised the development of light industrial, warehousing and logistics facilities aligned with the approved layout plans, but does not cover the storage of more than 80 m³ of hazardous material.

The site does not intersect any sensitive environmental features and is not located in close proximity to any sensitive environmental features. The closest environmental feature is the Northern Wetland which is located approximately 206 metres to the north-west of the proposed hazardous material storage area. The Northern Wetland was assessed during the Basic Assessment (BA) Process for Keystone Park and is managed through the existing Keystone Park EA.

The overall hazardous storage being applied for will be greater than 80 m³, but will not exceed 382 m³ and will comprise:

- Diesel generators and fire pumps (will not exceed a capacity of 50 m³), and;
- Storage of products with hazardous and flammable products (approximately 332 m³).

There will be diesel generators and fire pumps stored on site. The capacity of these will not exceed 50 m³. The equipment will be suitably fitted with measures to ensure both safety and containment in the event of a spill.

The product storage area will contain racking for approximately 332 pallets (which are a maximum of one (1) ton each). Therefore, the capacity of the storage area will be 332 tons (i.e. 332 m³). This storage area will be above ground and suitably bunded. The storage area has been designed to be separated from the main warehouse, to ensure safety and security of staff, property and the environment, given that it is designed to ensure adequate containment. The total bunding for the area will be designed to accommodate 110% of the volume of the products, and therefore the bund will have a capacity to accommodate approximately 365.2 m³.

The storage area will be used for temporary storage of 'in-transit' products, which will be temporarily stored on route to the transport hub. Whilst the storage of products may be temporary, the storage area is intended to be used long-term. The products will be regularly received from other distribution centres and suppliers, temporarily stored, and then regularly redistributed to transport hubs, other distribution centres and / or stores as needed.

This temporary storage area will have considerable socio-economic benefits, in that it will reduce logistics and distribution costs significantly by providing an 'in-between' storage location. Furthermore, there will be employment opportunities created for the operation of the storage area, skills development and subsequently contribution to local economic growth. The overall reduction in required logistic trips can also have a positive environmental benefit by potentially reducing the emissions from distribution vehicles.

It must be noted that no unprocessed chemicals or hazardous materials will be stored in this area and that only manufactured products, created from chemicals and hazardous materials, and which have hazardous and flammable properties, will be stored temporarily. Furthermore, no processing of any hazardous materials or products will be undertaken on site.

The storage area will house both liquid and dry products. Some of the common products intended to be stored include:

- Antiseptic liquids;
- Hand sanitisers;
- Deodorants;
- Bleach products;
- Hair sprays;
- Nail polish;
- Toilet cleaners;
- Insect repellents;
- Shoe polish;
- Mouthwashes;
- Disinfectants;
- Roll-on; and
- Body sprays.

A full list of potential products to be stored, and their HazMat Categories, is provided in **Appendix G2**. Note that this list may change over time as manufactured products change, however the type and nature of products being stored will remain similar to those listed above.

The applicant will keep inventories of products stored, and Material Safety Data Sheets where necessary.

The entire site is fitted with fire management equipment which includes fire extinguishers, fire protection systems and water storage for firefighting. Staff are regularly trained on the use of these.

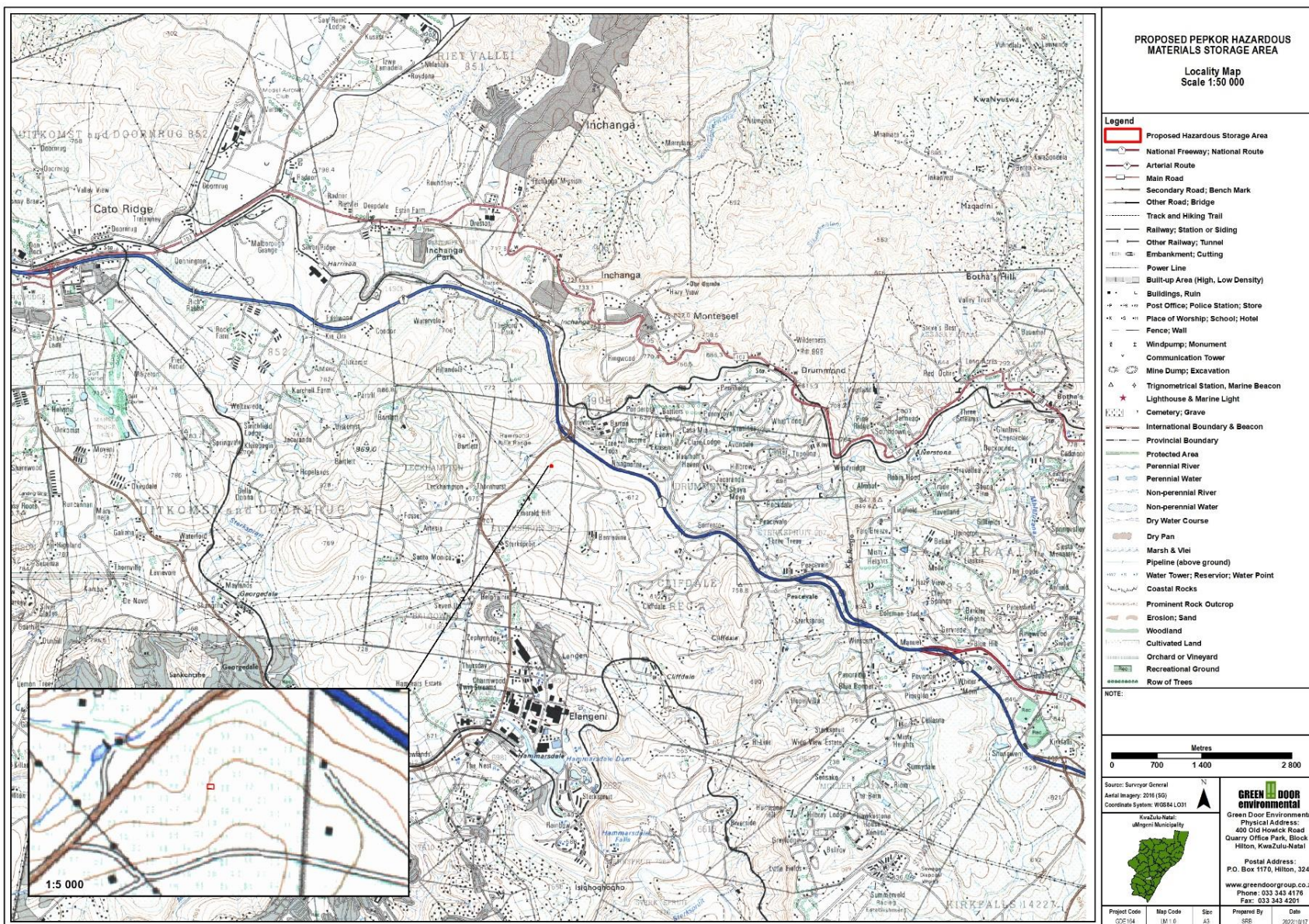


Figure 2: Locality Map of the proposed site.

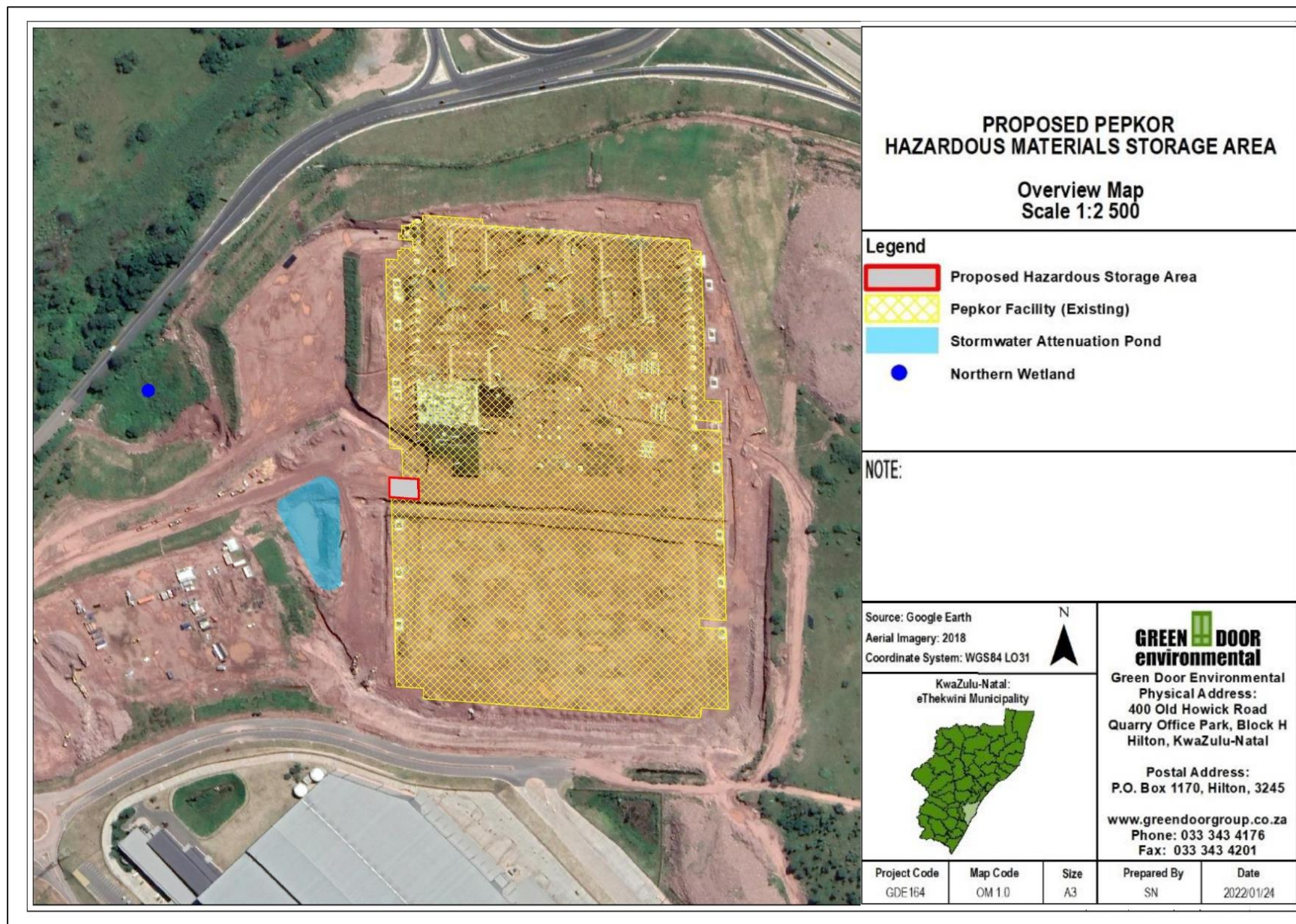


Figure 3: Site Layout Plan of the proposed site.

1.7.2 Services and Access

Water

The existing warehouse and platform contains fire response and management equipment and water supplies. The water requirements for fire response and management are already included in the warehouse and platform plans, and are the same supplies that will be utilised for any required fire response and management associated with the proposed hazardous materials storage area.

Similarly, existing water supplies within the existing warehouse will be utilised to supply the requirements of any staff associated with the proposed hazardous materials storage area. Water for both fire management and general use, is supplied by a municipal water supply.

Site Access

The proposed hazardous materials storage area will be located within the existing Pepkor Distribution and Logistics Facility, which has existing access. The Pepkor Facility can be accessed off the N3 and MR385 Road, and then via the internal road network within the Keystone Park Estate. No additional access is required to be established. No road establishment or upgrades are required.

Electricity

The electricity demand associated with the proposed hazardous materials storage area is minimal, and is already catered for within the existing electricity supply to the warehouse. Electricity to the warehouse is supplied by Eskom. No additional infrastructure or supply is required.

Bulk Sewer

The existing sanitation facilities and infrastructure in the existing warehouse will be utilised to meet the requirements of any staff associated with the proposed hazardous materials storage area. The existing sanitation infrastructure is connected to bulk municipal infrastructure; no new sanitation infrastructure is required.

Stormwater Management (Refer to **Appendix D2**)

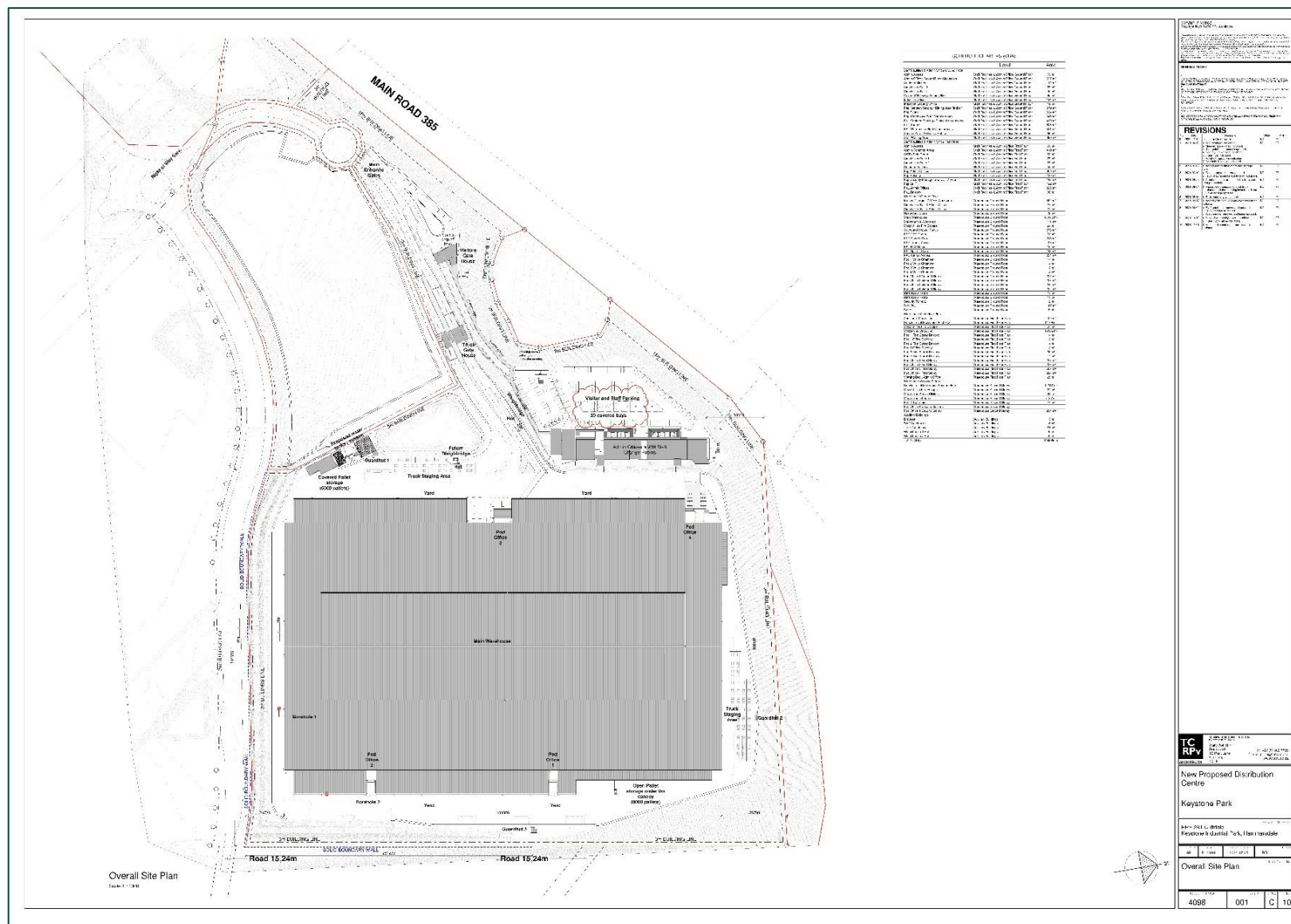
The intention of Stormwater Management for the site is to:

- Reduce post development stormwater flows by the effective use of on-site attenuation devices.
- Where practical, make use of rainwater harvesting techniques for the conservation and reuse of stormwater runoff.
- Prevent concentration of stormwater at points that are susceptible to erosion.
- Manage and contain potential soil erosion problem areas, particularly during the construction phase.
- Maintain adequate ground cover, particular to those areas disturbed during construction.
- Ensure that natural and artificial slopes do not become saturated and unstable.
- Ensure that the receiving environment can accommodate the increased flow.
- Ensure all stormwater control works are constructed in a safe and aesthetic manner.

Given that the greater Keystone Park Estate comprises hardened surfaces and large warehouses, attenuation forms a key part of the Stormwater Management approach. On the platform on which the Proposed Hazardous Materials Storage area is to be established, the following stormwater approaches exist:

- Rainwater harvesting and storage in aboveground tanks;
- Attenuation of stormwater in an attenuation structure; and
- Flow dissipation and erosion protection at all stormwater inlet and outlet points.

In terms of the proposed Hazardous Materials Storage area, no additional stormwater management approaches or infrastructure is required, as it forms part of the existing warehouse which has existing stormwater management systems in place.



1.7.3 Site Photographs



Figure 5: Internal and external photographs of the proposed storage area within the existing warehouse.

2 NEED AND DESIRABILITY

The following section makes use of the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP) Guideline on Need and Desirability (August 2011) and the Department of Environmental Affairs (DEA) Pretoria, Integrated Environmental Management Guideline Series 9: Guideline on Need and Desirability (2014).

1. Is the activity permitted in terms of the property's existing land use rights?

Yes, the site is zoned Light Industrial.

2. Will the activity be in line with the Provincial Spatial Development Framework (SDF)?

The National Spatial Development Framework (NSDF) promotes rapid economic growth that is sustained and inclusive and is a pre-requisite for the achievement of other policy objectives, among which poverty alleviation is key. The vision of the Provincial Spatial Development Framework (SDF) is '*Optimal and responsible utilisation of human and environmental resources, building on addressing need and maximising opportunities toward greater spatial equity and sustainability in development*'. As such, the Provincial SDF takes as its starting point, this goal of sustainable development. Development is only acceptable and in the public interest if it is ecologically justifiable, socially equitable and economically viable i.e. environmentally sustainable. This means that the development needs of present generations must be met without compromising meeting the needs of future generations.

Cognisance of environmental features has been taken for the proposed activity, through assessing the potential risks to these features, to ensure that no significant loss of environmental assets occur as a result of the proposed activity. Further, mitigation measures are to be implemented to ensure protection of environmental features. As such. The proposed activity is considered to be in line with the Provincial SDF and its goals relating to sustainable development.

Furthermore, the Provincial SDF indicates that the site and its surrounds are classified as 'Economic Support Areas' (Figure 6). Given that the proposed activity will support the warehousing and distribution activities associated with the Pepkor Facility, the proposed activity is in line with the Provincial SDF.

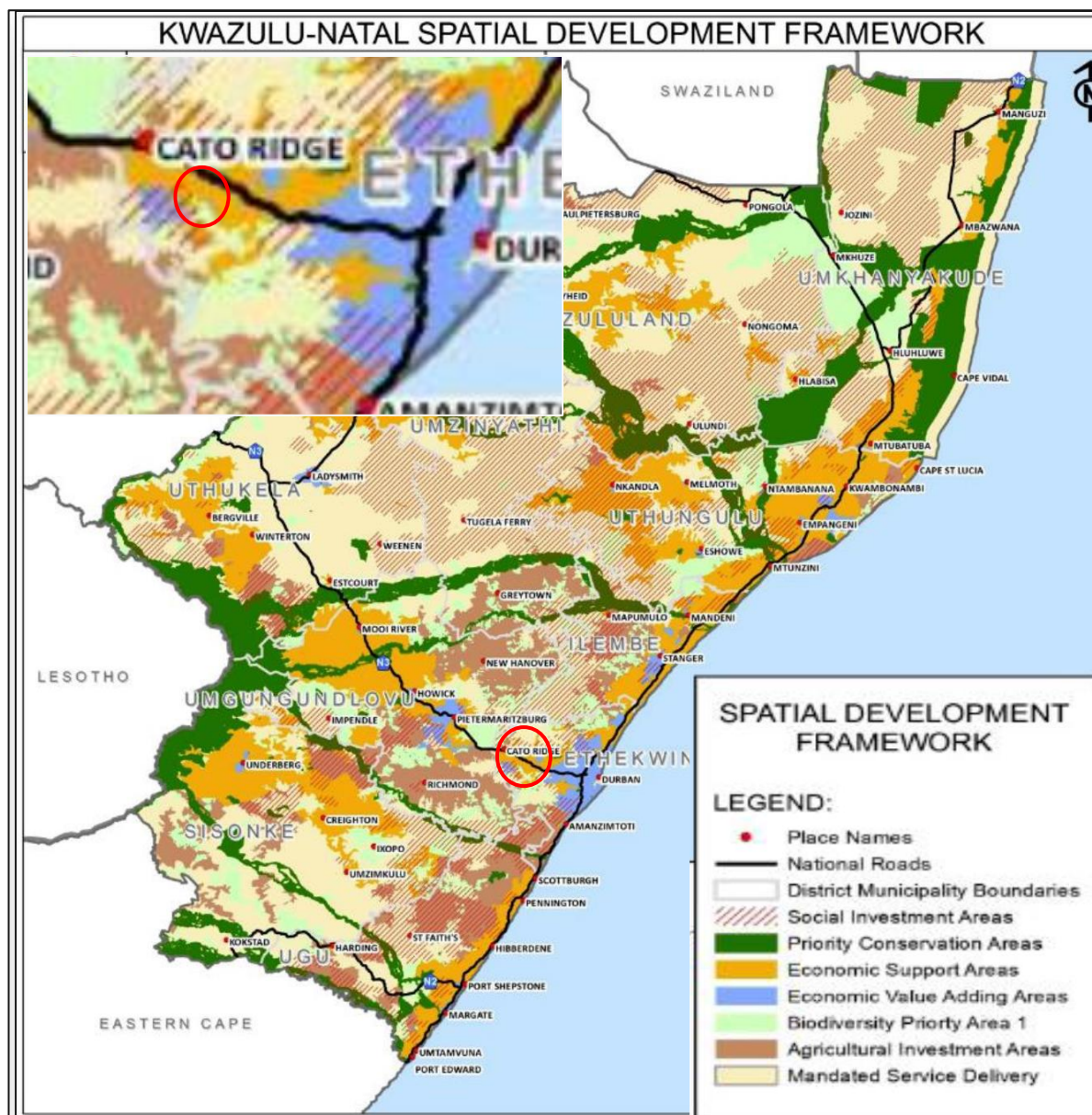


Figure 6: KwaZulu-Natal SDF (August 2011). Site indicated by red polygon.

3. Will the activity be in line with the Urban Edge / Edge of Built Environment for the area?

Not applicable.

4. Will the activity be in line with the Integrated Development Plan (IDP) and Spatial Development Framework (SDF) of the Local Municipality; would the approval of this application compromise the integrity of the existing approved and credible Municipal IDP and SDF?

The proposed development will be in line with the Municipal Integrated Development Plan (IDP) and Spatial Development Framework (SDF) and will not compromise the integrity of the existing approved and credible Municipal IDP and SDF.

The 2022/2023 eThekweni Municipal IDP outlines the Vision for eThekweni as “By 2030, eThekweni will enjoy the reputation of being Africa’s most caring and liveable city, where all citizens live in harmony”. The municipality shall deliver on the following strategies to achieve this vision as follows:

1. Develop and Sustain our Spatial, Natural and Built Environment
2. Develop a Prosperous, Diverse Economy and Employment Creation
3. Creating a Quality Living Environment

-
4. Fostering a Socially Equitable Environment
 5. Create a Platform for Growth, Empowerment and Skills Development
 6. Have a vibrant and creative city for a foundation for sustainability and social cohesion
 7. Good governance and Responsive Local Government
 8. Create a Financially Accountable and Sustainable City

The proposed development activity will contribute to achieving the vision and outcomes of the Municipal IDP, in that it will contribute to creating a prosperous, diverse economy and employment creation, by providing a development within a central business park in Hammarsdale.

In addition, the IDP states that “the vision for the Municipality (more so the timeframe) has been amended to ensure that there is alignment with key strategic documents namely the National Planning Vision and The Provincial Growth and Development Strategy. Both these strategic documents have a 2030 timeframe”. In order to achieve this vision, the eThekweni Metro faces certain key development challenges, which are identified as:

- High rates of unemployment and low economic growth;
- High levels of poverty;
- Low levels of skills development and literacy;
- Limited access to basic household and community services;
- Increased incidents of HIV/AIDS and communicable diseases;
- Loss of Natural Capital;
- Unsustainable developmental practises
- High levels of crime and risk;
- Ensuring adequate energy and water supply;
- Ensuring food security;
- Infrastructure degradation;
- Climate change;
- Ensuring financial sustainability; and
- Ineffectiveness and inefficiency of inward-looking local government is still prevalent in the Municipality.

In order to effectively address the abovementioned challenges and achieve the outcomes set for 2030, the eThekweni Metro, within the framework of their 5-year plan, has identified a delivery plan that is organised into eight separate but related plans and collectively known as the Eight Point Plan. The Eight Point Plan can be summarised as follows:

1. Develop and Sustain our Spatial, Natural and Built Environment.
2. Developing a Prosperous, Diverse Economy and Employment Creation.
3. Creating a Quality Living Environment.
4. Fostering a Socially Equitable Environment.
5. Creating a Platform for Growth, Empowerment and Skills Development.
6. Embracing our Cultural Diversity, Arts and Heritage.
7. Good Governance and Responsive Local Government. Green Door Environmental
8. Financially Accountable and Sustainable City.

The development of the eThekweni Metro's Five-Year Plan provided opportunity to re-assess development objectives in the context of the Millennium Development Goals, The National Development Plan, The National and Provincial Development Program, National Governments Outcome Nine Priorities and, at a Local Government level, the Long-Term Development Plan. The development and production of the Integrated Development Plan (IDP) feeds into the Eight Point Plan. Thus, the IDP and the Eight Point Plan directly supports the eThekweni Metro's long-term strategic goals and objectives, which are aligned to the National and Provincial Strategic Perspective and directly linked to the MDGs.

The proposed development complies with all the above Planning Initiatives, most notably job creation, skills development and economic sustainability. In addition, the proposed development will directly support the objectives of the eThekweni Metro's Eight Point Plan.

The 2015/2016 eThekweni SDF designates the site as 'Mixed Use'. It must be noted that this SDF designation is as a result of the site being a landmark site which has remained unchanged in terms of land use for many years. Both, the IDP and SDF aim to create an enabling environment and sustainable development which promotes improved quality of life.

The primary aim of the eThekweni SDF, developed in year 2015/2016, is to:

- direct and manage the use of the built and natural environment to ensure sustainable and integrated growth and development
- ensure that the IDP is in line with National and Provincial policies and strategies
- improve productivity and closing economic performance gaps and sustainable economic growth
- safeguarding the environment

In terms of the 2015 Spatial Development Plan (SDP) , the site in Hammarsdale, eThekweni Outer West Area, is within the identified Urban Development Line (UDL) and the Urban Investment Node, which is used to demarcate the extent to which urban development will be permitted to be established within the metropolitan area in the long term and to promote convenient, compact, efficient, equitable and sustainable settlement. Thus, the location of the proposed development is in line with the eThekweni Metro's IDP and SDP, which reflect the development goals and objectives of the abovementioned Planning Initiatives.

Figure 7 presents the eThekweni Spatial Development Plan. According to the SDP, the proposed establishment of a Hazardous Materials Storage Area is located in an area zoned Light Industrial.

Based on the above, the proposed development is consistent with the vision and goals of the local Municipality. Further to the above, the SDF states that safeguarding the environment must take place and this must be governed by appropriate design guidelines. The proposed development will aid in achieving the above-mentioned objectives.

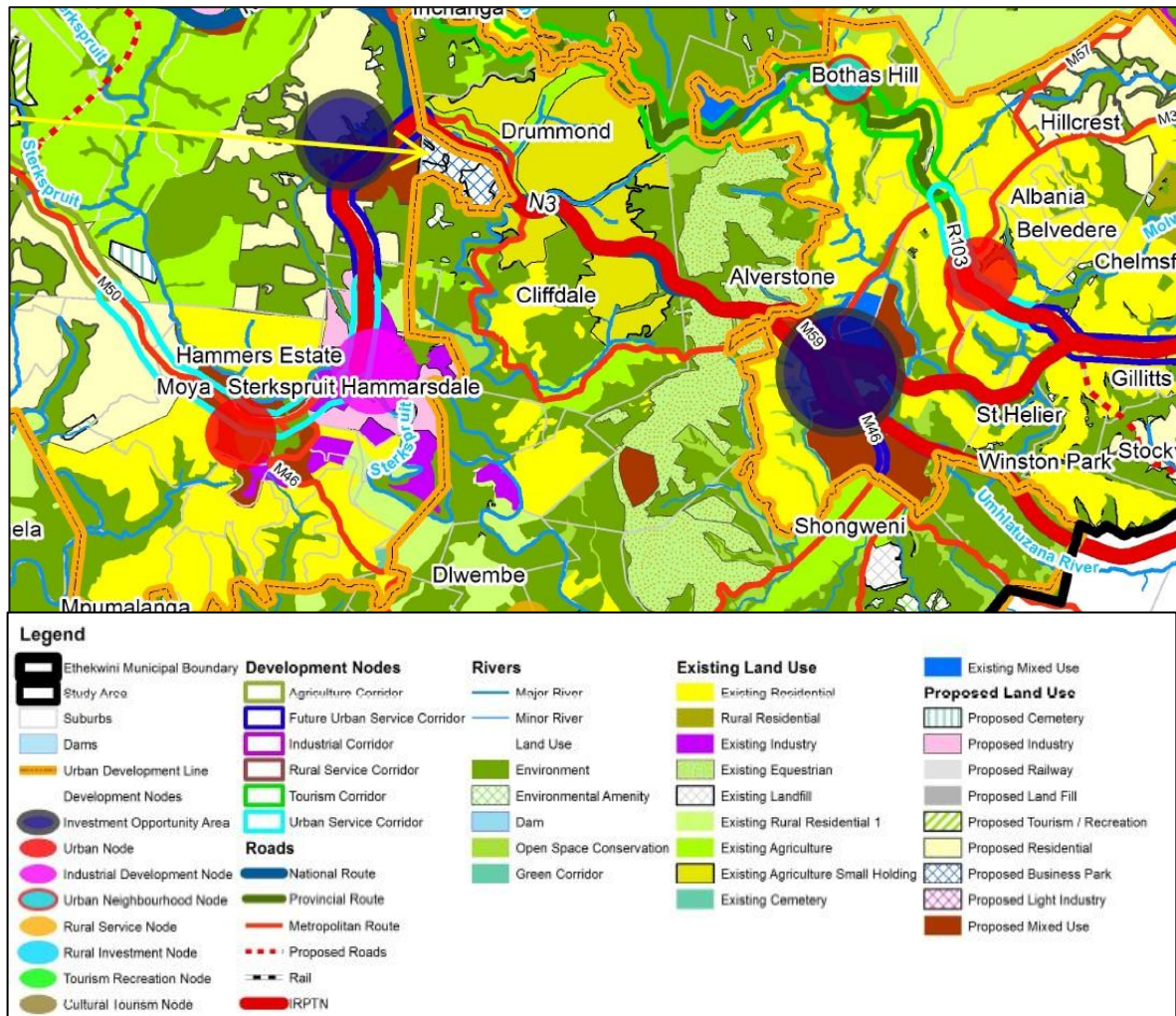


Figure 7: eThekweni Spatial Development Plan (eThekweni SDP 2015)

5. Will the activity be in line with an approved Structure Plan of the Municipality?

Yes, the proposed development has been approved within the Keystone Park Light Industrial Warehouse & Logistics Precinct, where light industrial activities will take place. The facility is therefore in line with the Structure Plan of the eThekweni Metropolitan Municipality.

6. Will the activity be in line with an Environmental Management Framework (EMF) adopted by the Department; would the approval of this application compromise the integrity of the existing environmental management priorities for the area and if so, can it be justified in terms of sustainability considerations?

There is no EMF for this area in eThekweni, however, according to the IDP and SDF, this is aligned with spatial planning, as described in question 4 above. The approval of the development will not compromise the integrity of the environmental management policies for the Municipal area.

7. Will the activity be in line with any other plans (e.g., Guide Plan)?

Yes, the proposed development is in line with the following:

- 2022/2023 eThekweni Metropolitan Municipality IDP
- 2015/2016 eThekweni Metropolitan Municipality SDF
- 2015 eThekweni Metropolitan Municipality SDP
- Provincial Growth and Development Strategy 2021

8. Is the land use (associated with the activity being applied for) considered within the timeframe intended by the existing approved SDF agreed to by the relevant environmental

authority (i.e. is the proposed development in line with the projects and programmes identified as priorities within the credible IDP)?

Yes, the proposed development is consistent with the timeframes associated with the eThekweni IDP, which seeks to achieve its objectives 2023.

The timeframes associated with the eThekweni SDF are applicable given that the proposed development activities are consistent with the municipal SDF designation.

9. Does the community / area need the activity and the associated land use concerned (is it a societal priority)? This refers to the strategic as well as local level (e.g., development is a national priority, but within a specific local context it could be inappropriate?).

The proposed development provides much needed employment to the surrounding community that leads to local economic growth. Employment opportunities enable skills development amongst people within the community which result in investments into the area. When investments begin, they will pose direct and indirect benefits the local and surrounding areas. For this to occur, the construction and operation phases are both significantly beneficial.

10. Are the necessary services with adequate capacity currently available (at the time of application), or must additional capacity be created to cater for the development?

All the necessary services with adequate capacity are available within the existing warehouse and platform. No additional service infrastructure or capacity is required.

11. Is this development provided for in the infrastructure planning of the Municipality, and if not, what will the implication be on the infrastructure planning of the Municipality (priority and placement of services and opportunity costs)?

All the necessary services with adequate capacity are available within the existing warehouse and platform. No additional service infrastructure or capacity is required. As such, the proposed activity will not have any adverse impacts on the infrastructure planning within the municipality.

12. Is this project part of a national programme to address an issue of national concern or importance?

Whilst the proposed development is not at a national scale, it addresses regional needs which indirectly contribute to addressing national concerns. Some of the national concerns which are addressed / contributed to, at a regional scale, include, but are not limited to:

- The need for storing and transporting hazardous materials;
- High unemployment rates, and;
- Need for economic growth.

13. Do location factors favour this land use (associated with the activity applied for) at this place? (This relates to the contextualisation of the proposed land use on this site within its broader context.)

Yes, the site is considered to be favourable and suitable for the proposed development for the following reasons:

- It is located adjacent to the National Highway (N3) and is in close proximity to the transport networks, for easy accessibility.
- It is surrounded by similar existing land uses.
- It will bring additional business and employment opportunities and subsequently economic growth into the region, which is much needed following the effects of COVID-19, the 2021 looting incidents in eThekweni, and the April-May 2022 flooding.
- It is suitably sized to accommodate the proposed development and their requirement supporting infrastructure and access.
- It is already in a developing area, and as such has fewer environmental constraints and risks associated with it, as compared to an undeveloped and untransformed site.

- It will provide much needed supply of the hazardous materials without having people to travel longer distances to access the materials. This also means that less vehicles will be on the roads, reducing traffic and costs of commuting over longer distances.

14. Is the development the best practicable environmental option for this land / site?

Yes, the proposed development has been considered as the preferred option as it will have the least environmental impact, whilst ensuring the desired socio-economic benefits are realised, provided the mitigation measures outlined in this report and the Environmental Management Programme (EMPr), are implemented.

The Screening Tool Report for the site is attached at **Appendix G1** and presents potential sensitivities identified for the site. The **Table 4** below presents the comments relating to each of the identified sensitivities from the Screening Tool Report.

Table 4: Screening Tool Report Sensitivities for the site.

SENSITIVITY	COMMENT
High Agriculture Theme	This sensitivity has likely been identified due to site historically (prior to development), being under agricultural land uses. However, the site has since been rezoned, and has obtained a relevant EA to transform the land from agriculture to a light industrial development (Refer to Appendix G3). As such, this sensitivity is not applicable to this application.
High Animal Species	This sensitivity has likely been identified due to the site previously being undeveloped. However, the site has since been rezoned, and has obtained a relevant EA to transform the land from agriculture to a light industrial development (Refer to Appendix G3). Biodiversity related aspects would have been assessed during the Keystone Park BA Process. As such, this sensitivity is not applicable to this application.
Very High Aquatic Biodiversity	This sensitivity has likely been identified due to the site being in proximity to the Northern Wetland. This wetland is managed under the existing Keystone Park EA. However, a Wetland Risk Assessment (Appendix D1) has been undertaken to assess the potential risks on the wetland, in relation to the specific activities being applied for. Mitigation measures have been identified by the wetland specialist and these have been incorporated into this report and the Environmental Management Programme (EMPr).
Very High Archaeological and Cultural Heritage	The sensitivity has likely been identified due to the site being previously undeveloped. However, the site has since been rezoned, and has obtained a relevant EA to transform the land from agriculture to a light industrial development (Refer to Appendix G3). Archaeological, cultural and heritage related aspects would have been assessed during the Keystone Park BA Process. As such, this sensitivity is not applicable to this application.
High Civil Aviation	This sensitivity is not applicable for this site as there are no civil aviation facilities in the area. The proposed activities will not result in civil aviation activity.
Low Defence	This sensitivity is not applicable for this site as there are no defence facilities in the area. The proposed activities will not result in defence related activities.
Low Palaeontology	The sensitivity has likely been identified due to the site being previously undeveloped. However, the site has since been rezoned, and has obtained a relevant EA to transform the land from agriculture to a light industrial development (Refer to Appendix G3). Palaeontological related aspects would have been assessed during the Keystone Park BA Process. As such, this sensitivity is not applicable to this application.
Medium Plant Species	This sensitivity has likely been identified due to the site previously being undeveloped. However, the site has since been rezoned, and has obtained a

	relevant EA to transform the land from agriculture to a light industrial development (Refer to Appendix G3). Biodiversity related aspects would have been assessed during the Keystone Park BA Process. As such, this sensitivity is not applicable to this application.
Very High Terrestrial Biodiversity	This sensitivity has likely been identified due to the site previously being undeveloped. However, the site has since been rezoned, and has obtained a relevant EA to transform the land from agriculture to a light industrial development (Refer to Appendix G3). Biodiversity related aspects would have been assessed during the Keystone Park BA Process. As such, this sensitivity is not applicable to this application.

15. Will the benefits of the proposed land use / development outweigh the negative impacts of it?

Yes, the adverse impacts associated with the proposed activities are limited. The economic benefits, in particular, are of great value.

16. Will the proposed land use / development set a precedent for similar activities in the area (local Municipality)?

The proposed development will not set a precedent for the immediate surrounding areas, as it will result in the site being redeveloped to be more aligned to these surrounding and existent land uses. The project can create the opportunity to afford better storage which will decrease distribution costs and travel, which, in turn, reduces the quantity of flammables on the transport networks.

17. Will any person's rights be negatively affected by the proposed activity/ies?

No, based on the findings of the specialist studies, and the Impact Assessment, no person's rights will be negatively affected by the proposed activity, provided the mitigation measures outlined in this report and the EMP, are adhered to.

18. Will the proposed activity/ies contribute to any of the 18 Strategic Integrated Projects (SIPs)?

According to the Infrastructure Development Act, Act 23 of 2014, Strategic Integrated Projects (SIPs) constitute:

A public infrastructure project or group of projects contemplated in section 7 and may comprise of one or more installation, structure, facility, system, service or process relating to any matter specified in Schedule 1 or which had been added by the Council in terms of section 7(1)(a).

Given that the proposed development constitutes a private development, it does not contribute to any SIPs. However, the proposed development will contribute towards poverty alleviation and income generation.

19. What will the benefits be to society in general and to the local communities?

The proposed activity will provide the following local benefits:

- Creation of employment opportunities: Temporary employment opportunities during the construction phase and permanent employment opportunities during the operational phase.
- Creation of business opportunities and a decrease in distribution costs for the hazardous materials.
- Less traffic will be associated with fewer vehicles transporting the hazardous materials which decrease the chances of road accidents and minimizes the quantity of flammables being transported which can be a hazardous to road commuters.
- Skills development.
- Local economic growth.

20. Any other need and desirability considerations related to the proposed activity?

There are no other need and desirability considerations related to the proposed activity.

21. How does the project fit into the National Development Plan for 2030?

The National Development Plan (NDP) for 2030, highlights nine (9) primary challenges within South Africa, which need to be addressed:

1. Unemployment.
2. The quality of school education for black people is poor.
3. Infrastructure is poorly located, inadequate and under maintained.
4. Spatial divides hinder inclusive development.
5. The economy is unsustainably resource intensive.
6. The public health system cannot meet demand or sustain quality.
7. Public services are uneven and often of poor quality.
8. Corruption levels are high.
9. South Africa remains a divided society.

The proposed activity addresses challenge 1 of the NDP for 2030, through the generation of employment opportunities.

22. Please describe how the general objectives of Integrated Environmental Management as set out in section 23 of NEMA have been taken into account.

According to Section 23 of NEMA,

(2) The general objective of integrated environmental management is to-

- (a) promote the integration of the principles of environmental management set out in section 2 into the making of all decisions which may have a significant effect on the environment;*
- (b) identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage, the risks and consequences and alternatives and options for mitigation of activities, with a view to minimising negative impacts, maximising benefits, and promoting compliance with the principles of environmental management set out in section 2;*
- (c) ensure that the effects of activities on the environment receive adequate consideration before actions are taken in connection with them;*
- (d) ensure adequate and appropriate opportunity for public participation in decisions that may affect the environment;*
- (e) ensure the consideration of environmental attributes in management and decision-making which may have a significant effect on the environment; and*
- (f) identify and employ the modes of environmental management best suited to ensuring that a particular activity is pursued in accordance with the principles of environmental management set out in section 2.*

The objectives of Environmental Management have been considered by:

- Undertaking the BA Process which allows for identifying, predicting and evaluating impacts associated with the proposed development.
- Undertaking specialist assessments as part of the BA Process, which allows for a full understanding of the impact of the proposed development on the receiving environment.
- Undertaking public participation processes in accordance with legislation and guidelines for the BA Process.
- Compiling of an EMP, to guide management and mitigation of any foreseen and potential impacts.

23. Please describe how the principles of environmental management as set out in Section 2 of NEMA have been taken into account.

Section 2 of NEMA states

(2) 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.

Similarly to the above question, the principles of environmental management have been considered by:

- Undertaking the BA Process which allows for identifying, predicting and evaluating impacts associated with the proposed development.
- Undertaking specialist assessments as part of the BA Process, which allows for a full understanding of the impact of the proposed development on the receiving environment.
- Undertaking public participation processes in accordance with legislation and guidelines for the BA Process.
- Compiling of an EMPr, to guide management and mitigation of any foreseen and potential impacts.

3 ALTERNATIVES

3.1 Alternatives Considered

“Alternatives”, in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to —

(a) The property on which or location where it is proposed to undertake the activity:

No alternate properties or locations for the proposed development of the hazardous storage facility have been identified or investigated, as part of the project.

The proposed site is considered suitable for the development of the proposed hazardous material storage and facility in that:

- The site is owned by the applicant.
- The site is located in an area zoned as Light Industrial.
- The site is adequately sized for the development of the facility.
- The site is easily accessible from the Mr385 road.
- The site forms the location from which the hazardous materials are distributed to and are to be distributed from.
- The site is suitably located in relation to environmental sensitivities.
- The site is located within an existing well secured and serviced premises.

For these reasons, no alternate properties have been investigated in the Basic Assessment process.

(b) The type of activity to be undertaken:

No alternative activities have been identified or assessed, as the purpose of this application is for the proposed development of a hazardous material storage facility at a highly desirable and convenient location. All other activities associated with the site have been assessed and investigated in the completed Environmental Authorisation process for the original Keystone Park Estate.

(c) The design or layout of the activity:

Alternative layouts have not been investigated, as there was one (1) most suitable location for the proposed Hazardous Materials Storage Area, within the premises. This location within the premises was considered ideal as:

- It was unallocated to other uses / activities and available for use.
- It was suitably located in relation to environmental sensitivities.
- It was suitably located in relation to fire management equipment and infrastructure.

(d) The technology to be used in the activity:

The Hazardous Materials Storage Area will contain racking for approximately 332 pallets (of a maximum of one (1) ton each). In addition, the property will be fitted with diesel generators and fire pumps which will not exceed a capacity of 50m³. the overall hazardous materials storage proposed for the site will not exceed 382m³. The proposed development will be aboveground and bunded to contain 110% of the volume of contents.

(e) The ‘do nothing’ option of not implementing the activity:

If there is no storage for the hazardous materials, the distribution and travel costs will increase due to more logistic trips being required. This would also result in more emissions being generated from distribution trucks. This would result in hazardous and flammable materials being transported on roads for longer periods of time. This increases fire and safety risks whilst trucks are on the road, due to accidents and looting. Furthermore, socio-economic benefits will not be realised.

4 PUBLIC PARTICIPATION PROCESS

4.1 Protection of Personal Information Act (POPIA, Act No 14 of 2013)

The Protection of Personal Information Act (POPIA, Act No. 14 of 2013) came into effect on 01 July 2021 and aims to promote the protection of personal information. In terms of the POPIA, personal information refers to *‘the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person’*. The EIA Regulations require, inter alia, transparent disclosure of registered Interested and Affected Parties (I&APs) and their comments. I&APs who submit comment, attend a Public Information Session or request registration in writing for the Basic Assessment Process are deemed registered I&APs who must be added to the list of I&APs. By registering, I&APs are deemed to give their consent for relevant information to be processed and disclosed, in fulfilment of the requirements of the EIA Regulations.

For the purposes of this BA Process and in terms of the requirements of the POPIA, only the names, affiliations and comments of I&APs have been included in this report. Should additional personal information be required by the DEDTEA, consent to share this personal information will be obtained from the I&AP prior to doing so.

4.2 Interested and Affected Parties

A register of I&APs was compiled at the outset of the project. This includes names and contact details of Authorities, Government / Municipal Departments, NGOs, community representatives, local interest groups, local business owners, surrounding landowners and neighbours. The list of I&APs has been continually updated to include persons responding to the various notification mediums. The I&AP list which takes cognisance of POPIA, is attached at **Appendix C1**.

4.3 Notification of the Proposed Development

Notification of the proposed development was given through:

- Publication of English and isiZulu advertisements in the Witness on 22 February 2022, and in the ECHO on 24 February 2022 respectively.
- Placement of English and isiZulu site posters on the periphery of the site and in close proximity to the site on the 22 February 2022.

The adverts and site posters informed the public about the proposed activity and invited them to register their interest in the project. Advertisements are attached at **Appendix C2**, and site posters at **Appendix C3**.

4.4 Background Information Document

Written notification in the form of a Background Information Document (BID) was circulated from 1 March 2022. The BID provides details of the aims and processes of the EA application process and invites all I&APs to register on the project and provide preliminary comments on the proposal. The BID and comments received on the BID are attached at **Appendix C4** and **Appendix C6** respectively.

Comments on the BID and responses thereto are outlined in **Section 4.8.1**.

4.5 Public Information Session

As per approval from the Competent Authority in the Pre-Application Meeting, no Public Information Session was undertaken.

4.6 Consultation with Competent Authority

The following consultations have been undertaken with the DEDTEA to date:

- A pre-application meeting with DEDTEA was held on the 06 April 2022 via Zoom. The Pre-Application Presentation, Meeting Minutes and Attendance Register are attached at **Appendix C5**.

The following consultation is still to occur:

- A copy of the Draft Basic Assessment Report (DBAR) will be submitted to DEDTEA for the legislated 30-Day Comment Period.
- DEDTEA will provide a response and comments on the DBAR within 30 Days of receipt of the DBAR.
- An Environmental Application form will be submitted to DEDTEA. The Draft EA Application Form is attached at **Appendix B**. An Acknowledgement Letter will then be received from DEDTEA, quoting a reference number.
- The Final Basic Assessment Report (FBAR) will then be submitted to DEDTEA for decision making.

4.7 Circulation of the Draft Basic Assessment Report

Copies of the DBAR have been circulated to the following key I&APs for review and comment within the 30-Day comment period:

- eThekweni Metropolitan Municipality – Batha Msomi
- Department of Economic Development, Tourism and Environmental Affairs (DEDTEA) – Natasha Brijlal
- Department of Agriculture and Rural Development (DARD) – Bayo Ogunnaike, Thandekile Nxumalo
- Department of Transport (DoT) – Michele Schmid
- Department of Fisheries, Forestry and Environment – Nandipha Sontangane
- Department of Water & Sanitation (DWS) – Strini Govender
- Msunduzi Local Municipality – Gideon Duma
- AMAFA Heritage KwaZulu-Natal – Bernadet Pawandiwa
- Eskom
- SANRAL – Thobile Duma
- Transnet Freight Rail – Yuza Chabala

All remaining I&APs have been notified of the availability of the DBAR for review and comment and are afforded 30 days to provide comments. Comments received and responses thereto will be provided in the FBAR.

4.8 Comments & Response Register

Comments and Responses for the following are outlined in the sections hereafter:

- Comments and responses on the BID (**Table 5**), and
- Comments and responses from the Pre-Application Meeting with DEDTEA (**Table 6**).

4.8.1. Background Information Document Comments & Responses

Table 5: Comments & Responses on the BID.

I&AP	COMMENT	RESPONSE
Eskom	<ul style="list-style-type: none"> • Please see comments below, as per your request received by Eskom on 1st March 2022. We confirm that an investigation has been carried out with regard to the supply of electricity, as well a nay encroachment into Eskom's Servitudes, in respect to the application as set out above referring to Locality Map and KMZ file supplied by Greendoor Environmental. • Please note that the proposed storage facility is approximately 200m away from Eskom's 11kV Underground Cable namely, Royal NB188. Please send attached drawing number ER_INV_178_2022 showing Eskom infrastructure in relation to the proposed facility. It is very important to note that Eskom's LV data is not reflected on the drawing supplied. It is advisable you contact Eskom immediately, should you physically detect any conductors and/or underground cables on the ground and not reflected on the drawing. Eskom's call centre number is 08600 37566. No construction is permitted in the area where Eskom infrastructure is located before consulting Eskom's Senior Supervisor, Mr Brad Cooper on 064 902 3003 and email CooperBJ@eskom.co.za • Building Restrictions for an 11kV Underground Cable: <ul style="list-style-type: none"> - Eskom has maintained through the years that 'no excavations maybe effected within 1.5 metres from any of its underground electric cables'. Therefore, keeping servitude areas for underground cables at a minimum 3.00 metres wide is preferable. Where multiple cables are laid next to each other, 300mm spacing apart from each other is preferable. - Eskom shall retain unobstructed access at all times - Changes in ground level may not infringe statutory ground to conductor clearances or statutory visibility clearances or on the depth levels at which Eskom underground cables are laid, usually 1-1.2m. After any changes in ground level, the surface shall be rehabilitated and stabilised so as to prevent erosion. The measures taken shall be to Eskom's requirements. - Eskom's rights and duties in the Wayleave/Servitude area shall be accepted as having prior right at all times and shall not be obstructed or interfered with. - The clearances between Eskom's live electrical equipment and the proposed construction work shall be observed as stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993) (Annexure F). 	<ul style="list-style-type: none"> • Thank you for your response. • Noted. • Thank you for your comments. • This has been noted.

	<ul style="list-style-type: none"> • Eskom shall not be liable for the death of or injury to any person or for the loss of or damage to any property whether as a result of the encroachment or of the use of the stipulated area by the applicant, his/her agent, contractors, employees, successors in title, and assigns. The applicant indemnifies Eskom against loss, claims or damages including claims pertaining to consequential damages by third parties and whether as a result of damage to or interruption of or interference with Eskom's services or apparatus or otherwise. Eskom will not be held responsible for damage to the applicant's equipment. The applicant's attention is drawn to the Electricity Act, 1987, (Act 41 of 1987, as amended in 1994), Section 27(3), which stipulates that the applicant can be fined and/or imprisoned as a result of damage to Eskom's apparatus. • No mechanical equipment, including mechanical excavators or high lifting machinery, shall be used in the vicinity of Eskom's apparatus and/or services, without prior written permission having been granted by Eskom. If such permission is granted the applicant must give at least seven working days prior notice of the commencement of work. This allows time for arrangements to be made for supervision and/or precautionary instructions to be issued. • The clearances between Eskom's live electrical equipment and the proposed construction work shall be observed as stipulated by Regulation 15 of the Electrical Machinery Regulations of the Occupational Health and Safety Act, 1993 (Act 85 of 1993). Equipment shall be regarded electrically live and therefore dangerous at all times. • A developer taking a new supply from Eskom, an increase of supply or line deviation is required to make an application to Eskom via the Eskom toll free number 0860037566. This application will be processed in terms of Eskom's standard customer connection tariffs, conditions and policies at the developers cost. There is an attached indemnity form that you are required to complete and return to Land Development as part of your acknowledgement. • The Data, Information and Drawings is made available to you by Eskom Holdings SOC Limited on an "AS IS" basis, without warranty of any kind, including without limitation, the warranties of fitness for a particular purpose. Availability of this data, information and drawings does not constitute scientific publication. The Data, information and drawings may contain errors, be incomplete or out-dated). Eskom Holdings SOC Limited and its employees make no representation or warranty, express or implied, including without limitation any warranty of fitness for a particular purpose or warranties as to the quality, accuracy, completeness or currency of the data, information and drawings. • This approval is valid for 12 months only, after which the applicant must reapply if the work 	<ul style="list-style-type: none"> • Noted. • Noted • This has been noted. • Thank you for your comment. • This has been noted. Thank you for your comment.
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	undertaken has not been completed. Any changes / deviations to the original application must be immediately communicated to this office together with a new application. All costs for damage/s to Eskom infrastructure during construction or any work carried out by the applicant shall be borne by the applicant.	
Department of Agriculture & Rural Development	<ul style="list-style-type: none"> • The Provincial Department of Agriculture and Rural Development: Agricultural Resource Management, Land Use Regulatory Unit acknowledges the receipt of the above-mentioned application. • The main objective of the application is to request Provincial Department of Agriculture and Rural Development to recommend, provide valuable inputs and comments on proposed establishment of a Hazardous Material Storage are within existing Pepkor Distribution and Logistics Facility, ERF 281 Cliffdale, Keystone Park. • The applicant Pepkor Trading (Pty) Ltd wishes to establish a Hazardous Material Storage are within existing Pepkor Distribution. • In terms of National Environmental Management Act, certain Listed Activities are specified for which either a Basic Assessment 9GNR 327 and GNR 324) or Scoping and EIA (GNR 325) is required. • GNR 327_Activity 14_ The development of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in contained with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres, • This activity is applicable as the Applicant proposed to store approximately 382 cubic metres of materials/ • The proposed project will be subject to a Basic Assessment Process, for which the applicant is required to appoint an independent Environmental Assessment Practitioner. • This proposed Hazardous Material Storage Area will <ul style="list-style-type: none"> - be established within a Pepkor distribution and Logistics Facility which is currently under construction. - Contain racking for approximately 332 pallets (of a maximum of 1 ton each) - Be aboveground and bunded to contain 110% of the volume of contents. • Pepkor Distribution and Logistic Facility is authorised under existing Environmental Authorisation issued to Keystone Park CC for the development of the Keystone Light Industrial, Warehousing and Logistic Park. • However, the authorisation did not cater to storage of dangerous goods of more than 80-metre cube. As much the applicant is applying for development of an approximately 382m³ 	<ul style="list-style-type: none"> • Thank you for your comments. • Noted. • Agreed. • Noted. • That is correct. • That is correct. • Noted. • Thank you for your comment. • Noted. • Noted.

	<p>of a Hazardous Material.</p> <ul style="list-style-type: none"> • As per the submitted application the site is already transformed and does not contain any sensitive environmental features. • Basic Assessment Process will investigate <ul style="list-style-type: none"> - Potential pollution and contamination impacts - Potential air quality impacts (dependent on materials to be stored) - Water quality Impacts and - Health and Safety Impacts. • As per the generalised assumptions the proposed development will not impact any agricultural activities as it is within a well-developed industrial park. • Validation through general site inspection, Keystone Park CC is an existing development in Hammarsdale area and the proposed is only expansion of what is already happening on site. • Nevertheless, this is just a BID therefore limited information is provided by the applicant so that the office is able to take a conclusive decision but with a hope that a Basic Assessment Report is still to be submitted with all facts. • Land Use Management is requesting that the following is to be submitted with the Basic Assessment Report: <ul style="list-style-type: none"> - Specifies what Hazardous Materials are going to be kept onsite. - Risk Assessment elaboration especially on adjacent land properties. 	<ul style="list-style-type: none"> • This has been noted. • Noted. • Noted. • Thank you for your comment – that is correct. • Thank you for your comment. The DBAR has been made available for comment for a 30-Day period. • Specifics of the hazardous materials are provided in Section 1.7.1 and Appendix G2. A Wetland Risk Assessment is attached at Appendix D1.
Department of Transport	<ul style="list-style-type: none"> • Structures and Services <p>In order for the Department to ensure operational efficiency of the Provincial Road Network so as to ensure Road Safety is not compromised the Department maintains a level of control over Structures and Services, both within the declared or expropriated road reserve and in that portion of land immediately adjacent to the road reserve, known as the building restriction area, as defined in Section 13 (1) (a) & (b) of the Kwazulu-Natal Roads Act No. 4 of 2001.</p> <ul style="list-style-type: none"> - No buildings or any structures whatsoever, other than a fence, hedge or a wall which does not rise higher than 2,1 meters above or below the surface of the land on which it stands, shall be erected on the land within a distance of 15 meters measured from 	<ul style="list-style-type: none"> • This has been noted. • Noted.

	<p>the road reserve boundary of a Blacktop surfaced Main or District Road, or within a distance of 30 meters measured from the center line of a Gravel surfaced Main Road; or within a distance of 25 meters measured from the center line of a Gravel surfaced District Road.</p> <ul style="list-style-type: none"> - The road reserve boundary shall be determined in consultation with this Departments Road Information Services, (Tel: 033–355 8600). - On Main Roads, no single pole power transmission line, telecommunication line, cable, or pipeline with a diameter of less than 100mm diameter should be placed within a distance of 13 metres of the Road centreline. Nor, in addition, should they be more than 2 metres <u>inside</u> the road reserve boundary. Except at approved crossings of the road reserve, the closest point a pipeline exceeding 100mm in diameter should be at least 17 metres from the centreline of a Main Road, carriageway or ramp. In addition, the closest point a pipeline should be located is at least 2 metres <u>outside</u> of the road reserve boundary. - On District Roads and Local Roads, no single pole power transmission line, telecommunication line, cable, or pipeline with a diameter of less than 100mm diameter should be placed within a distance of 8 metres of the Road centreline. Nor, in addition, should be more than 2 metres <u>inside</u> the road reserve boundary. Except at approved crossings of the road reserve, the closest point a pipeline exceeding 100mm in diameter should be at least 12 metres from the centreline of a District Road or Local Road. In addition, the closest point a pipeline should be located is at least 2 metres <u>outside</u> of the road reserve boundary. - All Structures and Services are to be approved and placed in consultation with and to the satisfaction of the relevant Cost Centre Manager. <p>*Structures means any structure, erection or other improvement, aboveground or underground, whether permanent or temporary and irrespective of its nature or size, including but not limited to advertisements, any enclosures, fences, driveways, garden walls, golf course fairways, loading areas, parking areas, patios, signs, swimming pools, tennis courts, thatched shelters or utility service.</p> <ul style="list-style-type: none"> • Any approval by this Department does not exempt the applicant from the provisions of any other Act required in the approval thereof. 	<ul style="list-style-type: none"> • Noted. • Noted. • This has been noted. • Noted. • Thank you for your comment. • This has been noted.
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	<ul style="list-style-type: none"> Accordingly, the services must be positioned in consultation with and to the satisfaction of this Department's relevant Cost Centre Manager. Upon the acceptance of the position of the pipeline, etc. a formal application with the plans are to be submitted to the said Cost Centre Manager. This Department policy is that no blacktopped roads may be trenched. The pipe crossing may be jacked or bored under Main Roads. Details of the crossing must accompany the application. Kindly be advised all bridge, causeway or culvert related enquiries need to be submitted to this Department's Engineering Services: Bridge Engineer Transportation, Infrastructure and Regional Services for comment or approval. Please be advised this correspondence is purely an informative response indicating the standard Departmental conditions for Structures and Services. This is not an approval letter nor does this not grant authorization or exemption from compliance with any other relevant and applicable legislation. 	<ul style="list-style-type: none"> This has been noted. Noted. Thank you for your comment. Thank you for your comment.
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4.8.2 Pre-Application Meeting Comments & Responses

Table 6: Comments & Responses from the Pre-Application Meeting.

COMMENT	RESPONSE
• DEDTEA requested further information of what types of hazardous materials will be stored.	• Specifics of the hazardous materials are provided in Section 1.7.1 and Appendix G2 .
• DEDTEA enquired what hazardous materials are needed for.	• The purpose of the hazardous storage area is outlined in Section 1.7.1 .
• DEDTEA enquired if the hazardous materials will be used for any other on-site processes and what would be undertaken in the main warehouse	• The main warehouse will serve as a distribution warehouse. No manufacturing processes will be undertaken and the hazardous materials will not be utilised in any processes on site.
• DEDTEA queried if an agricultural assessment will be required.	• The EAP confirmed that this will not be required as the site is entirely transformed.
• DEDTEA queried if any noise impacts may be applicable.	• The EAP confirmed that minimal noise impacts are anticipated given that this is a storage facility, and no production or processing is being undertaken on site.
• DEDTEA queried how stormwater would be managed.	• There is an existing and approved Stormwater Management Plan. Refer to Appendix D2 .

COMMENT	RESPONSE
• DEDTEA confirmed that they approve the proposed specialist study, given that the development site has been previously assessed.	• Noted.
• DEDTEA requested that eThekwin Health and Air Quality be consulted with during the process to ensure an AEL is not required.	• Noted. eEThekwin Health and Air Quality have been consulted and have confirmed that no Air Emissions License is required. Refer to Appendix G4 .
• DEDTEA requested that each sensitivity in the Screening Report be reviewed and commented on in the DBAR.	• Noted, this has been provided in Section 2, Table 4 .
• DEDTEA requested that the DBAR should cover the socio-economic impacts.	• Noted – please refer to Section 5 .

4.5.2 Summary of Issues Raised

The main issues, concerns and queries which have been raised to date, are outlined below:

- Questions about the types of hazardous materials that will be stored.
- Queries regarding what the hazardous materials will be utilised for and if they will be used for any on-site processes.
- Concerns about the measures to safeguard the hazardous materials safely.
- Concerns of noise impacts.
- Concerns around the management of stormwater.

5 POTENTIAL IMPACTS ON THE SOCIAL AND ECONOMIC ENVIRONMENTS

5.1 Local Economy and Employment Opportunities / Need and Desirability

Description:

The primary source of income for the people in the area is in the light industrial and commercial developments in the area. The surrounding areas will benefit from job security and job creation. There is currently a high level of unemployment in the area and local people have been affected by the economic conditions that have forced companies to cut back their costs, such as additional labour, in order to remain viable.

Implication / Risk / Impact:

- The proposed activity will result in employment opportunities being created.
- The proposed activity will contribute to local economic growth and development.

Mitigation / Recommendations:

- None required.

5.2 Planning Initiatives

National Spatial Development Perspective (NSDP)

The Policy Co-ordination and Advisory Services introduced a National Spatial Development Perspective (NSDP), which was then endorsed by the Cabinet in March 2003. The NSDP works in conjunction with different Departmental and Provincial spatial and development strategies. The four principles of the NSDP are as follows:

- Economic growth is a prerequisite for achievement of policy objectives;
- Government spending must concentrate on fixed investment, focusing on localities of economic growth and / or economic potential;
- Efforts to address the past and current inequalities must focus on people not on places; and
- To overcome spatial distortions of apartheid, future settlement and economic development opportunities must be channelled into nodes adjacent to the main growth centres.

In order to distinguish between localities, the NSDP uses two concepts as methodological tools, which are Potential and Poverty Gap. These two concepts will assist the NSDP in providing a coarse-grained analysis from a national perspective, which will be supplemented by a more finely, grained analysis at Provincial and Local Government level.

In defining potential, the NSDP has drawn on recent tradition of “institutional economics” a field that has come to dominate both developmental economics and regional planning. The institutional approach suggests that beyond the usual sources of comparative advantage, the institutional adequacy of a locality will help determine whether development is sustainable or not. The NSDP therefore uses concepts of potential that rely strongly on the presence of institutional capacity to realize the developmental impact of other resources.

In summary, the NSDP will have a role to play as an instrument that informs the respective development plans of the three spheres of government i.e. IDP, PGDS and the Medium Term Strategic Framework (MTSF).

KZN Growth and Development Strategy (PGDS)

Inequalities exist in our economy and there is a legacy of inequitable spatial development. This has had a negative impact on public sector investment as highlighted by the National Spatial Development Perspective (NSDP). This is evident in the lopsided economic and social costs for poor communities in

locations far from employment and other opportunities. The PGDS is a vehicle to address the legacies of the apartheid space economy, to promote sustainable development and to ensure poverty eradication and employment creation.

Government has a mandate to restructure the process of development and service delivery in the province. This is to be achieved through the three spheres of government, the different government sectors and the various strategic frameworks. The key challenges it faces is to effectively align and harmonise these structures towards this end; and to harness and align fiscal, financial and human resources at its disposal towards eradicating poverty, creating employment and laying the foundations for accelerated economic growth.

The PGDS offers a tool through which provincial government can direct and articulate its strategy and similarly for local government to reflect the necessary human, financial and fiscal support it needs to achieve these outcomes. It facilitates proper coordination between different spheres of government and aims to prevent provincial departments from acting out of concert with local Municipalities. It enables intergovernmental alignment and guides activities of various role players and agencies (provincial sector departments, parastatals, district and local Municipalities). The PGDS will enhance service delivery.

It is a framework for public and private sector investment, indicating areas of opportunities and development priorities. It addresses key issues of implementation blockages whilst providing strategic direction. The PGDS implies a developmental approach to government. This implies a pro-active and facilitative approach to development and not one based of formulating and applying regulations and restrictions. The PGDS on the one hand involves preparing policies, strategies and guidelines and on the other hand it involves preparing mechanisms to align and facilitate the implementation, monitoring and evaluation of key growth and development priorities.

Millennium Development Goals

Looking to the future, the Municipality believes they can achieve the overarching goal: to put an end to poverty.

The MDGs represent a global partnership that has grown from the commitments and targets established at the world summits of the 1990s. Responding to the world's main development challenges and to the calls of civil society, the MDGs promote poverty reduction, education, maternal health, gender equality, and aim at combating child mortality, AIDS and other diseases.

Set for this year the MDGs are an agreed set of goals that can be achieved if all actors work together and do their part. Poor countries have pledged to govern better and invest in their people through health care and education. Rich countries have pledged to support them, through aid, debt relief, and fairer trade.

The eThekweni Metro, as part of the globalized community, is playing its part in ensuring that it provides the necessary infrastructure, especially water and sanitation facilities, to help reduce diseases, hunger and poverty. Working together with all the relevant stakeholders, the eThekweni Metro is committed to achieving the aim of the MDGs.

Alignment with Municipal Goals and Objectives

The eThekweni Metro has ensured that all its long-term strategic goals and objectives (particularly water, sanitation and poverty alleviation) are aligned to National and Provincial Strategic Perspective, which has a direct link with MDGs.

Implication / Risk / Impact:

- The proposed activity will be in line with goals and objectives of the eThekweni Metropolitan Municipality IDP and the above mentioned national and provincial strategies.
- The proposed activity is aligned with the Provincial SDF, IDP, SDP and Provincial Growth and Development Strategy 2021.
- The proposed activity is aligned with the current Light Industrial zoning of the site.

Mitigation / Recommendations:

- None required.

5.3 Cultural, Historical and Archaeological Resources

Description

The proposed activity will entail the storage of hazardous materials in a designated area within an existing warehouse. Given that the activity will be undertaken in a transformed environment (i.e. within an existing warehouse), no cultural, historical or archaeological resources will be impacted.

Cultural, historical and archaeological impacts associated with the entirety of the Keystone Park Estate were assessed in the Environmental Authorisation application process for such, and have already been approved through the Keystone Park EA.

Implication / Risk / Impact:

- None.

Mitigation / Recommendations:

- None required.

5.4 Surrounding Land Use and Aesthetics

Description:

The proposed activity will entail the storage of hazardous materials in a designated area within an existing warehouse. Given that the activity will be undertaken in a transformed environment (i.e. within an existing warehouse), which is located within an existing Light Industrial Estate, no adverse impacts on surrounding land uses or aesthetics will occur.

Surrounding land use and aesthetics impacts associated with the entirety of the Keystone Park Estate were assessed in Environmental Authorisation application process for such, and have already been approved through the Keystone Park EA.

Implication / Risk / Impact:

- None.

Mitigation / Recommendations:

- None required.

5.5 Traffic, Roads and Access

Description:

The proposed activity will entail the storage of hazardous materials in a designated area within an existing warehouse. Traffic impacts associated with the entirety of the Keystone Park Estate were

assessed in Environmental Authorisation application process for such, and have already been approved through the Keystone Park EA.

Furthermore, the proposed activity is intended to reduce the requirement for additional trips by distribution trucks, by providing a storage space for the hazardous materials.

Implication / Risk / Impact:

- None.

Mitigation / Recommendations:

- None required.

5.6 Operational Activities, Noise and Dust

Description:

The proposed activity will entail the storage of hazardous materials in a designated area within an existing warehouse. No construction activities will be undertaken. No noise and dust will be generated during the operation of the activity.

Noise and dust impacts associated with the entirety of the Keystone Park Estate were assessed in Environmental Authorisation application process for such, and have already been approved through the Keystone Park EA.

Implication / Risk / Impact:

- None.

Mitigation / Recommendations:

- None required.

5.7 Safety and Security

Description:

The site in which the proposed hazardous materials storage area is to be located will be completely secured with perimeter fencing, controlled access points and 24-hour security. In addition to this, the Keystone Park Estate has 24-hour security to safeguard against unlawful protest action or looting. Access to the proposed hazardous materials storage area will be restricted to authorised personnel only.

Given that flammable materials are to be stored, there are safety risks associated with fires and explosions.

Implication / Risk / Impact:

- There are potential risks of the storage area being broken into, looted or burnt by criminals.

Mitigation / Recommendations:

- 24-hour security is to be maintained for the site.
- Access onto and off the site must be controlled. Doorways, halls and stairways must not be blocked for the easy flow of traffic.
- Only authorised personnel must be allowed access to the proposed hazardous materials storage area.
- The storage area must have marked clearly with appropriate warning signs.

-
- Fire management and response equipment must be maintained in good working order at all times.
 - Adequate fire prevention equipment must be available at all times.
 - Compile evacuation plans and display evacuation routes in high traffic areas like passages.
 - Emergency numbers must be displayed near all telephones.
 - Staff must be trained with emergency drills in case of an emergency event.
 - Fire extinguishers must be readily available, in good working condition and within view at all times.
 - Any sources of ignition that may be a risk of starting a fire must be removed.

6 POTENTIAL IMPACTS ON THE BIOPHYSICAL ENVIRONMENT

6.1 Topography

Description:

The site is generally level, with very gentle undulating slopes in places.

Table 7: General gradient of the site.

Flat	1:50 – 1:20	1:20 – 1:15	1:15 – 1:10	1:10 – 1:7,5	1:7,5 – 1:5	Steeper than 1:5
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Table 8: Landform describing the site.

Ridgeline	Plateau	Side slope of hill /mountain	Closed valley	Open valley	Plain	Undulating plain/low hills	Dune	Sea- front
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Table 9: Groundcover of the site.

Natural veld - good condition ^E	Natural veld with scattered aliens ^E	Natural veld with heavy alien infestation ^E	Veld dominated by alien species ^E	Gardens
Sport field	Cultivated land	Paved surface	Building or other structure	Bare soil

The proposed activity will entail the storage of hazardous materials in a designated area within an existing warehouse on an existing platform. The platform has steep embankments.

Implication / Risk / Impact:

- Uncontrolled runoff from any fire response in relation to the proposed hazardous materials storage area can result in erosion and other damages if not suitably controlled and diverted.
- Uncontrolled runoff from any fire response in relation to the proposed hazardous material storage can result in contaminated runoff entering the environment.

Mitigation / Recommendations:

- Fire response measures must ensure that runoff from such activities is not diverted in an uncontrolled manner which causes erosion or damage.
- As far as possible, water from fire response measures must be contained within the designated bunded area, which is designed to contain 110% of the volume of its contents.

6.2 Climate

Description:

Mean Annual Precipitation and Temperature in KZN are illustrated in Figures 6 and 7. The mean annual precipitation for the site is 767 mm of rain. The mean annual temperature for the site is 24.1° C.

Implication / Risk / Impact:

- Potential exists for high intensity rainstorm events to cause possible flooding at the facility if stormwater infrastructure is not properly maintained.

Mitigation / Recommendations:

- Stormwater infrastructure and structures must be monitored and maintained on a regular basis.
- The Stormwater Management Plan (Refer to **Appendix D2**) must be adhered to.
- Risk management measures must be put on place to mitigate risks in areas of high consequence where the flood severity is medium to high. These areas include bridges, walkways, parking bays and roadways. These measures can include stable railings, highly sufficient stormwater management, alternative access areas and parking bays in the case of a flood warning.
- No building works, earthworks, walls or fences may obstruct or encroach on any watercourse inside or outside the site.
- Ensure that the natural flow of the stormwater on site is adequately protected against erosion.

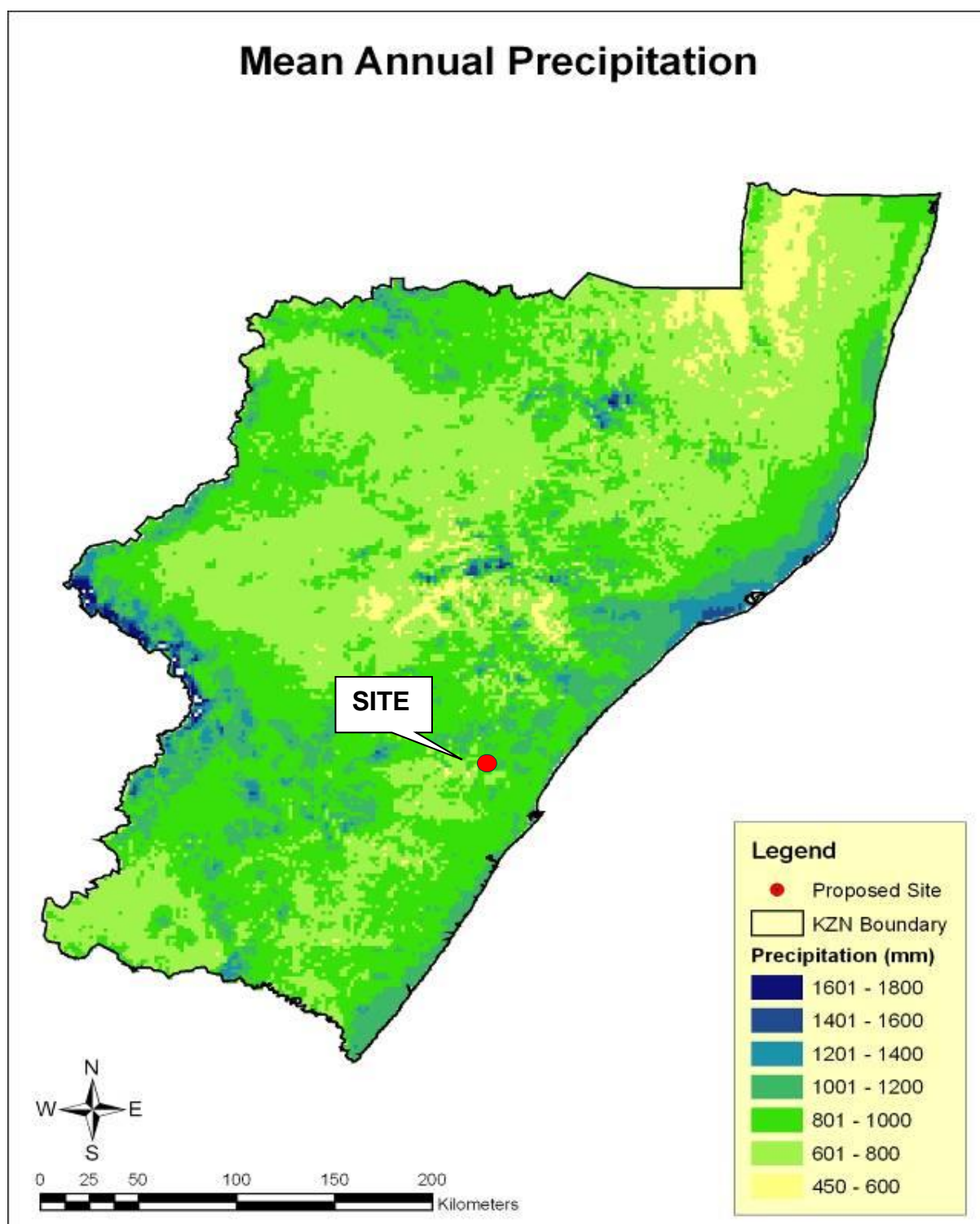


Figure 8: Mean Annual Precipitation in KwaZulu-Natal.

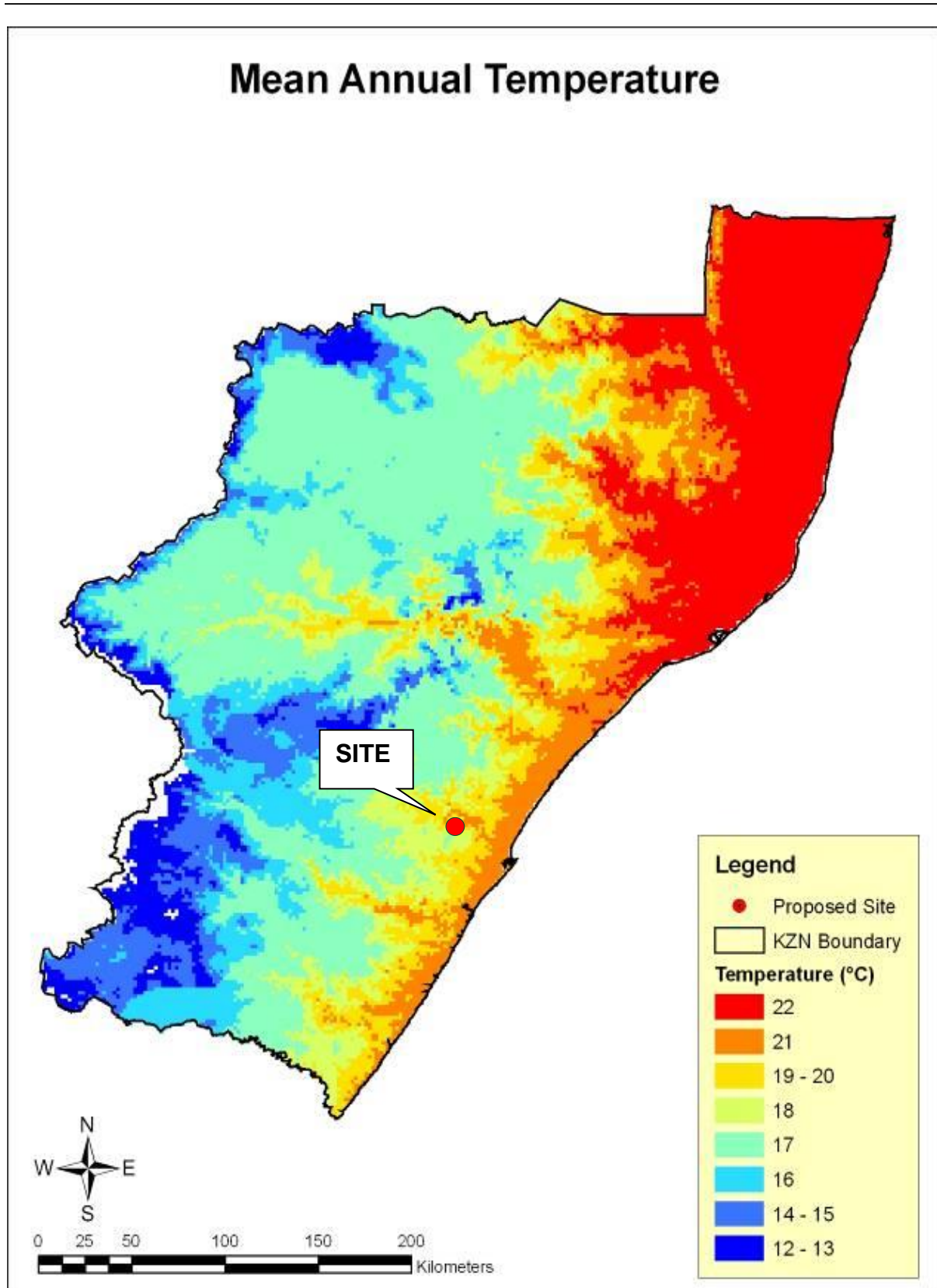


Figure 9: Mean Annual Precipitation in KwaZulu-Natal.

6.3 Climate Change

Description

Climate change is a global challenge, which is both impacted by development and activities and which has effects on development and activities. In South Africa, the effects of climate change are increasing, with more frequent heat waves, droughts, flood events and severe weather conditions. These conditions are especially challenging considering the water scarcity in the country, the high fire danger in many areas and the high dependence on our wide-spread agricultural areas. At the same time, South Africa is challenged with the great need to promote development as a developing country, with the high-impact mining sector and linked electricity generation sector being predominant contributors to economic growth, whilst also being a predominant contributor to climate change.

In order to ensure sustainable development is achieved and that contributions to climate change are minimised, it is imperative that all development, transformative and resource-utilising activities take cognisance of climate change. At the same time, it is important to note that part of the response to climate change includes adapting to its effects and promoting development and activities which allows the population to become more resilient to the impacts of climate change. This may include ensuring delivery of basic services (water, sanitation and electricity), improving food security and enhancing economic security.

In order to appropriately respond to climate change, all developments and activities must consider the following:

- How does the development / activity affect climate change?
- What effect does climate change have on the development / activity?
- What climate change adaptation responses are required for the development / activity?
- What pro-active climate change mitigation measures can be implemented for the development / activity?

Implication / Risk / Impact

- The proposed activity may contribute to climate change to a minor extent through energy usage, water usage and waste generation.
- The proposed activity may be impacted by the effects of climate change through severe storm events which may occur.

Mitigation / Recommendations

- All development infrastructure must promote the efficient use of energy, water and limit wastage of resources.
 - Rainwater harvesting must be encouraged at all buildings.
 - Contaminated surface runoff must be kept separate from uncontaminated surface runoff.
- Waste generation must be minimised and waste must be managed in an environmentally responsible manner and in accordance with the waste management hierarchy. The EMPr outlines specific waste management mitigation measures which comply with the waste management hierarchy.
 - Recycling and the provision of separate waste receptacles for different types of waste (paper, plastic, tin, glass etc) must be encouraged.
 - Waste must be stored in watertight, scavenger proof and wind proof waste receptacles which are fenced off and access controlled.

6.4 Geology and Soils

Description:

The proposed activity will entail the storage of hazardous materials in a designated area within an existing warehouse. Whilst majority of the site constitutes hardened surfaces, there are some nearby areas which will not be hardened (i.e., embankments and landscaping areas).

Implication / Risk / Impact:

- Areas without hardened surfaces may be at risk of soil being contaminated by the hazardous materials, should the storage area not be managed properly.

Mitigation / Recommendations:

- The proposed hazardous materials storage area must be managed in accordance with the EMPr.
- Hazardous materials must be stored and transported appropriately, such as, some hazardous materials must not be exposed to excessive heat.
- Relevant hazardous material must be stored in fireproof containers.
- The storage area must be regularly monitored and maintained.
- Adequate spill response equipment must be available at all times.
- Hazardous substances must not be left on un-bunded areas.
- Any spillages of substances must be cleared up immediately.
- Proper procedures for storing, transferring, handling, using and disposing of the hazardous materials must be followed.
- All workers on the jobsite must be trained to recognise the hazards and proper procedures associated with each hazardous material.
- All workers on the jobsite must have access to the Material Safety Data Sheet (MSDS) for the hazardous materials.

6.5 Biodiversity

Description:

The proposed activity will entail the storage of hazardous materials in a designated area within an existing warehouse. As such, there is no vegetation or biodiversity features present. The site is 100% transformed and not representative of any original vegetation types or ecosystems.

Biodiversity impacts associated with the entirety of the Keystone Park Estate were assessed in Environmental Authorisation application process for such and have already been approved through the Keystone Park EA.

Implication / Risk / Impact:

- None.

Mitigation / Recommendations:

- None required.

7 SPECIALIST STUDIES: KEY FINDINGS AND RECOMMENDATIONS

Note that additional specialist studies were not undertaken given that detailed assessments were undertaken during the Environmental Authorisation Process undertaken for the Keystone Park Estate. The specialist requirements for the project were confirmed with the Department of Economic Development, Tourism and Environmental Affairs (DEDTEA). Based on the direction of DEDTEA, the following specialist studies have been undertaken as part of the EA application process:

- Wetland Risk Assessment (**Appendix D1**)
- Stormwater Management Plan (**Appendix D2**)

7.1 Wetland Risk Assessment

A Wetland Risk Assessment was undertaken to ascertain the potential impact on the nearest watercourse i.e. the Northern Wetland at Keystone Park. This wetland is perceived to be the only wetland that can be potentially impacted upon by the proposed Hazardous Materials Storage Area at the Pepkor Distribution and Logistics Facility.

Key Findings

- The Northern Wetland is located over 175 metres away from the Hazardous Store.
- The risk ratings with the proposed mitigations have resulted in a risk rating of **LOW** for the operating phase of the Hazardous Materials Storage Area.
- The mitigation measures will ensure the risk of the Hazardous Materials Storage Area to be in the confines of acceptable risk for approval.

Recommendations

- Hazardous materials, on a series on pallets, will be stored on a rack area that is situated over a grating that includes a concreted bunded area (lined with a geosynthetic membrane) that would be able to contain 100 % of the stored volumes.
- A CO2 extinguishing system will be established. This will limit run-off from the platform and lower the risk of a fire event resulting in the hazmat store emanating contaminants to the environment.
- Should flows firefighting initiatives result in the hazardous waste entering stormwater infrastructure, flows are directed to a stormwater attenuation pond that is also lined with a geosynthetic liner to ensure flows are captured.
- The hazardous store bund is lined, and all logistical access areas are bunded and concreted. This results in seepage into sub soils being very limited.
- Daily monitoring of the hazardous store for potential leaks or issues must occur. A spill kit must be available and maintained.

7.2 Stormwater Management Plan

The intention of Stormwater Management for the site is to:

- Reduce post development stormwater flows by the effective use of on-site attenuation devices.
- Where practical, make use of rainwater harvesting techniques for the conservation and reuse of stormwater runoff.
- Prevent concentration of stormwater at points that are susceptible to erosion.
- Manage and contain potential soil erosion problem areas, particularly during the construction phase.
- Maintain adequate ground cover, particularly in those areas disturbed during construction.
- Ensure that natural and artificial slopes do not become saturated and unstable.
- Ensure that the receiving environment can accommodate the increased flow.
- Ensure all stormwater control works are constructed in a safe and aesthetic manner in keeping with the overall Architectural theme for the Development.

Given that the greater Keystone Park Estate comprises hardened surfaces and large warehouses, attenuation forms a key part of the Stormwater Management approach. On the platform on which the Proposed Hazardous Materials Storage area is to occur, the following stormwater approaches exist:

- Rainwater harvesting and storage in aboveground tanks;
- Attenuation of stormwater in an attenuation structure;
- Flow dissipation and erosion protection at all stormwater inlet and outlet points.

In terms of the proposed Hazardous Materials Storage area, no additional stormwater management approaches or infrastructure is required, as it forms part of the existing warehouse which has existing stormwater management systems in place.

8 ASSESSMENT OF ENVIRONMENTAL IMPACTS

8.1 Impact Assessment Methodology

In order to assess potential environmental issues associated with the proposed development, each aspect addressed in the two sections above have been given a qualitative rating in relation to its environmental impact (**Table 10**). Each aspect has been divided into a number of different classes, each of which has been assigned various criteria.

Where relevant, the following methods have been used to predict the characteristics of identified impacts:

- Professional judgement;
- Quantitative mathematical models;
- Experiments and physical models;
- Physical or visual simulations or maps (including GIS tools);
- Case studies; and
- Past experience.

Table 10: Summary of aspects used for assessing environmental impacts.

ASPECT	CLASS	CRITERIA
NATURE OF IMPACT	Positive	The impact on the environment will be positive.
	Negative	The impact on the environment will be negative.
	Direct	The impact is caused directly by the activity and generally occurs at the same time and place of the activity.
	Indirect	The impact induces changes that may occur as a result of the activity.
	Cumulative	The impact is as a result from the incremental impact of the proposed activity on a common resource when added the impacts of other past, present or reasonably foreseeable future activities.
OCCURRENCE OF IMPACT	Construction	The impact will happen during construction.
	Operation	The impact will happen during operation.
	Decommissioning	The impact will happen during decommissioning.
	Immediate	The impact will happen immediately.
	Delayed	There will be a delay in the impact occurring.
PROBABILITY OF IMPACT OCCURRING (WITH MITIGATION)	Definitely	The impact will definitely occur, even with mitigation (100%).
	Likely	It is likely that the impact will occur (60% - 99%).
	Fair	There is a fair chance that the impact will occur (30% - 59%).
	Unlikely	It is unlikely that the impact will occur (10% - 29%).
	Possible	It is possible to reverse the impact.

ASPECT	CLASS	CRITERIA
REVERSIBILITY (WITH MITIGATION)	Partly	It is partly possible to reverse the impact.
	Not Possible	It is not possible to reverse the impact.
EXTENT OF IMPACT (WITH MITIGATION)	Site	The impact will be limited to the site.
	Local	The impact will affect the local area (within a radius of 40 kilometres).
	Provincial	The impact will affect areas beyond the site but within the boundaries of KwaZulu-Natal.
	National	The impact will affect areas beyond the Province but within the boundaries of South Africa.
DURATION (WITH MITIGATION)	Short-term	0 – 5 Years (construction phase).
	Medium-term	5 – 40 Years (construction and operation).
	Long-term	> 40 years.
	Permanent	Permanent damage to the environment.
SIGNIFICANCE OF IMPACT WITHOUT MITIGATION	Low	Small impact / disturbance.
	Medium	Moderate impact / disturbance expected.
	High	Significant impact / disturbance expected.
SIGNIFICANCE OF IMPACT POST- MITIGATION	Low	Small impact / disturbance.
	Medium	Moderate impact / disturbance expected.
	High	Significant impact / disturbance expected.

8.2 Impact Assessment

The table below lists potential impacts associated with the proposed development, and details what mitigation measures must be taken to minimise these impacts (**Table 11**).

Table 11: Assessment of potential impacts associated with the establishment of the proposed development.

DESCRIPTION OF IDENTIFIED ENVIRONMENTAL IMPACT		MITIGATION	NATURE OF IMPACT	DEGREE TO WHICH IMPACT CAN BE MITIGATED	PROBABILITY OF IMPACT OCCURRING		REVERSIBILITY OF IMPACT		EXTENT OF IMPACT		DURATION OF IMPACT		SIGNIFICANCE OF IMPACT WITHOUT MITIGATION	SIGNIFICANCE OF IMPACT WITH MITIGATION
					WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION		
LOCAL ECONOMY AND EMPLOYMENT	<ul style="list-style-type: none"> The proposed activity will result in employment opportunities being created. The proposed activity will contribute to local economic growth and development. 	<ul style="list-style-type: none"> None. 	Positive	Partly	Definitely	Definitely	Partly	Partly	Local	Local	Long-Term / Permanent	Long-Term / Permanent	High (Positive)	High (Positive)
PLANNING INITIATIVES	<ul style="list-style-type: none"> The proposed activity will be in line with goals and objectives of the eThekweni Metropolitan Municipality IDP and the above mentioned national and provincial strategies. The proposed activity is aligned with the Provincial SDF, IDP, SDP and Provincial Growth and Development Strategy 2021. The proposed activity is aligned with the current Light Industrial zoning of the site. 	<ul style="list-style-type: none"> None. 	Positive	Partly	Definitely	Definitely	Partly	Partly	Local	Local	Long-Term	Long-Term	High (Positive)	High (Positive)

DESCRIPTION OF IDENTIFIED ENVIRONMENTAL IMPACT		MITIGATION	NATURE OF IMPACT	DEGREE TO WHICH IMPACT CAN BE MITIGATED	PROBABILITY OF IMPACT OCCURRING		REVERSIBILITY OF IMPACT		EXTENT OF IMPACT		DURATION OF IMPACT		SIGNIFICANCE OF IMPACT WITHOUT MITIGATION	SIGNIFICANCE OF IMPACT WITH MITIGATION
					WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION		
CULTURAL AND HISTORICAL RESOURCES	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> None.
SURROUNDING LAND USE AND AESTHETICS	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> None.

DESCRIPTION OF IDENTIFIED ENVIRONMENTAL IMPACT		MITIGATION	NATURE OF IMPACT	DEGREE TO WHICH IMPACT CAN BE MITIGATED	PROBABILITY OF IMPACT OCCURRING		REVERSIBILITY OF IMPACT		EXTENT OF IMPACT		DURATION OF IMPACT		SIGNIFICANCE OF IMPACT WITHOUT MITIGATION	SIGNIFICANCE OF IMPACT WITH MITIGATION
					WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION		
TRAFFIC, ROADS AND ACCESS	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> None.
CONSTRUCTION ACTIVITIES, NOISE AND DUST	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> None.

DESCRIPTION OF IDENTIFIED ENVIRONMENTAL IMPACT		MITIGATION	NATURE OF IMPACT	DEGREE TO WHICH IMPACT CAN BE MITIGATED	PROBABILITY OF IMPACT OCCURRING		REVERSIBILITY OF IMPACT		EXTENT OF IMPACT		DURATION OF IMPACT		SIGNIFICANCE OF IMPACT WITHOUT MITIGATION	SIGNIFICANCE OF IMPACT WITH MITIGATION
					WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION		
SAFETY AND SECURITY	<ul style="list-style-type: none"> There are potential risks of the storage area being broken into, looted or burnt by criminals. 	<ul style="list-style-type: none"> 24-hour security is to be maintained for the site. Access onto and off the site must be controlled. Doorways, halls and stairways must not be blocked for the easy flow of traffic. Only authorised personnel must be allowed access to the proposed hazardous materials storage area. The storage area must have marked clearly with appropriate warning signs. Fire management and response equipment must be maintained in good working order at all times. Adequate fire prevention equipment must be available at all times. Compile evacuation plans and display evacuation routes in high traffic areas like passages. Emergency numbers must be displayed near all telephones. Staff must be trained with emergency drills in case of an emergency event. Fire extinguishers must be readily available, in good working condition and within view at all times. Any sources of ignition that may be a risk of starting a fire must be removed. 	Negative, Indirect	Partly	Likely	Fair	Partly	Partly	Site, Local	Site, Local	Short-Term	Short-Term	Medium	Low

DESCRIPTION OF IDENTIFIED ENVIRONMENTAL IMPACT		MITIGATION	NATURE OF IMPACT	DEGREE TO WHICH IMPACT CAN BE MITIGATED	PROBABILITY OF IMPACT OCCURRING		REVERSIBILITY OF IMPACT		EXTENT OF IMPACT		DURATION OF IMPACT		SIGNIFICANCE OF IMPACT WITHOUT MITIGATION	SIGNIFICANCE OF IMPACT WITH MITIGATION
					WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION		
TOPOGRAPHY	<ul style="list-style-type: none"> Uncontrolled runoff from any fire response in relation to the proposed hazardous materials storage area can result in erosion and other damages if not suitably controlled and diverted. Uncontrolled runoff from any fire response in relation to the proposed hazardous material storage can result in contaminated runoff entering the environment. 	<ul style="list-style-type: none"> Fire response measures must ensure that runoff from such activities is not diverted in an uncontrolled manner which causes erosion or damage. As far as possible, water from fire response measures must be contained within the designated bunded area, which is designed to contain 110% of the volume of its contents. 	Negative, Direct	Partly	Likely	Fair	Partly	Possible	Site, Local	Site, Local	Short-Term	Short-Term	Medium	Low

DESCRIPTION OF IDENTIFIED ENVIRONMENTAL IMPACT		MITIGATION	NATURE OF IMPACT	DEGREE TO WHICH IMPACT CAN BE MITIGATED	PROBABILITY OF IMPACT OCCURRING		REVERSIBILITY OF IMPACT		EXTENT OF IMPACT		DURATION OF IMPACT		SIGNIFICANCE OF IMPACT WITHOUT MITIGATION	SIGNIFICANCE OF IMPACT WITH MITIGATION
					WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION		
CLIMATE	<ul style="list-style-type: none"> Potential exists for high intensity rainstorm events to cause possible flooding at the facility if stormwater infrastructure is not properly maintained. 	<ul style="list-style-type: none"> Stormwater infrastructure and structures must be monitored and maintained on a regular basis. The Stormwater Management Plan (Refer to Appendix D2) must be adhered to. Risk management measures must be put on place to mitigate risks in areas of high consequence where the flood severity is medium to high. These areas include bridges, walkways, parking bays and roadways. These measures can include stable railings, highly sufficient stormwater management, alternative access areas and parking bays in the case of a flood warning. No building works, earthworks, walls or fences may obstruct or encroach on any watercourse inside or outside the site. Ensure that the natural flow of the stormwater on site is adequately protected against erosion. 	Negative, Direct	Partly	Likely	Fair	Partly	Possible	Site, Local	Site, Local	Short-Term	Short-Term	Medium	Low

DESCRIPTION OF IDENTIFIED ENVIRONMENTAL IMPACT		MITIGATION	NATURE OF IMPACT	DEGREE TO WHICH IMPACT CAN BE MITIGATED	PROBABILITY OF IMPACT OCCURRING		REVERSIBILITY OF IMPACT		EXTENT OF IMPACT		DURATION OF IMPACT		SIGNIFICANCE OF IMPACT WITHOUT MITIGATION	SIGNIFICANCE OF IMPACT WITH MITIGATION
					WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION		
CLIMATE CHANGE	<ul style="list-style-type: none"> The proposed activity may contribute to climate change to a minor extent through energy usage, water usage and waste generation. The proposed activity may be impacted by the effects of climate change through severe storm events which may occur. 	<ul style="list-style-type: none"> All development infrastructure must promote the efficient use of energy, water and limit wastage of resources. Rainwater harvesting must be encouraged at all buildings. Contaminated surface runoff must be kept separate from uncontaminated surface runoff. Waste generation must be minimised and waste must be managed in an environmentally responsible manner and in accordance with the waste management hierarchy. The EMP outlines specific waste management mitigation measures which comply with the waste management hierarchy. Recycling and the provision of separate waste receptacles for different types of waste (paper, plastic, tin, glass etc) must be encouraged. Waste must be stored in watertight, scavenger proof and wind proof waste receptacles which are fenced off and access controlled. 	Negative, Indirect	Partly	Likely	Fair	Partly	Partly	Local	Local	Long-Term	Long-Term	Medium	Medium

DESCRIPTION OF IDENTIFIED ENVIRONMENTAL IMPACT		MITIGATION	NATURE OF IMPACT	DEGREE TO WHICH IMPACT CAN BE MITIGATED	PROBABILITY OF IMPACT OCCURRING		REVERSIBILITY OF IMPACT		EXTENT OF IMPACT		DURATION OF IMPACT		SIGNIFICANCE OF IMPACT WITHOUT MITIGATION	SIGNIFICANCE OF IMPACT WITH MITIGATION
					WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION		
GEOLOGY AND SOILS	<ul style="list-style-type: none"> Areas without hardened surfaces may be at risk of soil being contaminated by the hazardous materials, should the storage area not be managed properly. 	<ul style="list-style-type: none"> The proposed hazardous materials storage area must be managed in accordance with the EMPr. Hazardous materials must be stored and transported appropriately, such as, some hazardous materials must not be exposed to excessive heat. Relevant hazardous material must be stored in fireproof containers. The storage area must be regularly monitored and maintained. Adequate spill response equipment must be available at all times. Hazardous substances must not be left on un-bunded areas. Any spillages of substances must be cleared up immediately. Proper procedures for storing, transferring, handling, using and disposing of the hazardous materials must be followed. All workers on the jobsite must be trained to recognise the hazards and proper procedures associated with each hazardous material. All workers on the jobsite must have access to the Material Safety Data Sheet (MSDS) for the hazardous materials. 	Negative, Direct	Partly	Likely	Fair	Partly	Partly	Site, Local	Site, Local	Short-Term	Short-Term	Medium	Low

DESCRIPTION OF IDENTIFIED ENVIRONMENTAL IMPACT	MITIGATION	NATURE OF IMPACT	DEGREE TO WHICH IMPACT CAN BE MITIGATED	PROBABILITY OF IMPACT OCCURRING		REVERSIBILITY OF IMPACT		EXTENT OF IMPACT		DURATION OF IMPACT		SIGNIFICANCE OF IMPACT WITHOUT MITIGATION	SIGNIFICANCE OF IMPACT WITH MITIGATION
				WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION	WITHOUT MITIGATION	WITH MITIGATION		
BIODIVERSITY	None.	• None.

9 ENVIRONMENTAL MANAGEMENT PROGRAMME

In terms of the regulations stated in **Appendix 4** of Chapter 8 of NEMA GNR 326 (2014, as amended – 2017 and 2021) an Environmental Management Programme (EMPr) has been compiled (refer to **Appendix E**), which contains guidelines for ensuring that all activities associated with the proposed development are carried out in an environmentally responsible and acceptable manner. Management objectives and mitigation measures have been specified for the entire duration of the development.

The EMPr is based on the principles of the NEMA as well as the recommendations made in this Report. It identifies roles and responsibilities of management personnel on site and will be used as a framework for environmental compliance monitoring and reporting, should the proposed activity(s) be authorised.

An EMPr is a legally binding document that contains guidelines with which landowners and contractors must comply, and which must be strictly implemented and regularly monitored. If this is done, it is likely that the majority of the potentially adverse impacts associated with proposed activities can be minimised or prevented. An Environmental Control Officer (ECO) must be appointed by the developer to ensure compliance with the EMPr during the construction and operational phases. Should non-compliance occur, this must be brought to the attention of the DEDTEA, who will conduct the required prosecution procedure.

Specific management objectives and mitigation measures are specified in the EMPr for the entire duration of the development, including the following stages:

- Construction; and
- Operation.

10 POSITIVE AND NEGATIVE IMPLICATIONS OF THE PROPOSED DEVELOPMENT

10.1 Positive and Negative Implications of the Preferred Option – Hazardous Materials Storage Area.

Table 12: Positive and negative implications of the proposed development.

POSITIVE IMPLICATIONS	NEGATIVE IMPLICATIONS
<ul style="list-style-type: none">• Employment opportunities will be created during both construction and operation phases.• Minimal adverse impacts in terms of biodiversity, watercourses, noise and dust are anticipated.	<ul style="list-style-type: none">• Possible impacts if stormwater management system is not managed and maintained correctly.• Possibility of fires and theft in the event of looting or similar incidents if not managed correctly.

10.2 Positive and Negative Implications of the 'No Go Option'

Table 13: Positive and negative implications of the 'No Go Option'.

POSITIVE IMPLICATIONS	NEGATIVE IMPLICATIONS
<ul style="list-style-type: none">• None.	<p>By not granting Environmental Authorisation, the following would not occur:</p> <ul style="list-style-type: none">• Additional employment.• Job security for current employees.• If there is no storage for the hazardous materials, the distribution and travel costs will increase and result in more flammable materials being transported on the road. This increases the risk of accidents with vehicles transporting these hazardous materials and poses more risks to other commuters on the road. Furthermore, socio-economic benefits will not be realised.

11 EAP RECOMMENDATIONS AND CONCLUSION

The EAP wishes to reiterate that the information provided in this report is true and based on factual information provided by the specialist and I&APs.

Signed:  Date: 23 November 2022

Signed:  Date: 23 November 2022

Signed:  Date: 23 November 2022

The EAP is of the opinion that the proposed development of a hazardous material storage facility should be authorised, provided the following activities are made conditions of the Environmental Authorisation:

GENERAL

- The EMPr must be strictly implemented.
- Stormwater management must be monitored and maintained at the facility.
- Hazardous substances must not be left on un-bunded areas and must be managed appropriately.
- Any spillages of substances must be cleared up immediately and managed in accordance with the relevant Spill Contingency Plan.
- The site must be well secured to minimise risks of theft/looting of the products being stored.
- Precautionary measures must be undertaken such as adequate fire prevention equipment available, evacuation routes and plans for high-traffic areas and fire extinguishers which must be easily accessed.
- Hazardous materials must be stored and transported appropriately, such as some hazardous materials must not be exposed to excessive heat and stored in fireproof containers.
- Waste generation must be minimised and waste must be managed in an environmentally responsible manner and in accordance with the waste management hierarchy.
- All workers on the jobsite must have access to the Material Safety Data Sheet (MSDS) and be trained to recognise the hazards and proper procedures associated with each hazardous material.

CONCLUSION

There are minimal environmental impacts associated with the proposed activities given that the activities will take place in a transformed site within an existing warehouse, and is not within close proximity to any sensitive environments. The Environmental Assessment Practitioner (EAP) concludes that no fatal flaws have been identified during the environmental process and provided the Environmental Management Programme (EMPr) and recommendations made in this Report are strictly adhered to, there should be no significant, detrimental impacts on the environment.

12 APPENDICES

- Appendix A: Site Mapping & Layout Plans
- Appendix B: Draft Environmental Authorisation Application Form
- Appendix C: Public Participation Documents
 - Appendix C1: I&AP List
 - Appendix C2: Adverts
 - Appendix C3: Site Posters
 - Appendix C4: Background Information Document
 - Appendix C5: Consultation with DEDTEA
 - Appendix C6: Comments Received
 - Comments on the BID*
 - Comments on the DBAR*
- Appendix D: Specialist Reports & Declaration Forms
 - Appendix D1: Wetland Risk Assessment
 - Appendix D2: Stormwater Management Plan
- Appendix E: Environmental Management Programme (EMPr)
- Appendix F: EAP Documentation
 - Appendix F1: Environmental Assessment Practitioner Declaration
 - Appendix F2: Environmental Assessment Practitioners CV
 - Appendix F3: EAPASA Registration Certificate
- Appendix G: Other Information
 - Appendix G1: Screening Tool Report
 - Appendix G2: Product List
 - Appendix G3: Keystone Park Environmental Authorisation
 - Appendix G4: Ethekewini Air Quality Comment