DRAFT BASIC ASSESSMENT REPORT – REF. DM/0014/2020: KZN/EIA/0001405/2020

Submitted in terms of the Environmental Impact Assessment Regulations, 2014, as amended promulgated in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) to:

KWAZULU-NATAL DEPARTMENT OF ECONOMIC DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS (EDTEA)

PROJECT TITLE

Proposed Construction of Mageza Service Station (New Germany) including the Fuel Service Station with associated infrastructure on Erf 92 New Germany, Durban, EThekwini Metro, KwaZulu-Natal.

(1) (A) (i) DETAILS OF THE EAP WHO PREPARED THE REPORT:

Mondli Consulting Services has been appointed by Mageza Country Estate to undertake the Basic Assessment process for the construction of Mageza Service Station (New Germany) including the Fuel Service Station with associated infrastructure on Erf 92 New Germany.

Details of the EAP:

Business name of EAP:	**Mondli Consulting Services**		
Physical address:	**6 Joseph Avenue, New Era House, Suite 9, Durban North**		
Postal address:	**P O Box 22536, Glenashley**		
Postal code:	**4022**	**Cell:**	**0824187708**
Telephone:	**0826799841**	**Fax:**	**(031) 5725647**
E-mail:	**mondlib@webmail.co.za** **mondlibee@gmail.com**		

(ii) **The expertise of the EAP (including curriculum vitae IS ATTACHED)**

Name of representative of the EAP	Education qualifications	Professional affiliations	Experience at environmental assessments (yrs)
BM Mthembu	**Diploma in Nature Conservation** **Masters Degree (Environmental Studies Dissertation, Geography)** **Bachelor of Laws (LLB)**	**EAPASA registered EAP: No. 2018/168 in accordance with the prescribed criteria of Regulation 15(1) of section 24 H Registration Authority**	**Has been involved in environmental and conservation field for over 20 yrs.** **Conducted EIAs for over 17 years including Strategic Env. Assessment.**

		Regulations **Society of South African Geographers (Membership No. 28/09), confirmed to comply with the requirements set by South African Council for Natural Scientific Professions.**	**Has been involved in the review and commenting on development projects impacting on the environment.**
Sl Thwala	**National Diploma in Analytical Chemistry & Bachelor of Science degree majoring in Geography and Computer Science.**	**None**	**Three years experience in environmental management. Has years of experience in environmental training.**

(B) THE LOCATION OF THE ACTIVITY

(i) The project site is falling within eThekwini Metropolitan area, almost at the border of New Germany and Clermont township. It is on erf 92 New Germany, along Posselt Road.

N	O	F	T	0	3	4	5	0	0	0	0	0	0	9	2	0	0	0	0

(ii) The physical address and farm name

Property Number	**Property Description**	**Size**	**Development type**
1	Erf 92 New Germany, along Posselt Road. The site is **zoned General Industrial**.	The total site area is 23 237m² in extent, of which the Service Station with food outlets will occupy 5 349m² on the front side of the site as Phase 1.	Fuel Service Station

(iii) Where the required information in terms of (i) and (ii) is not available, the co-ordinates of the boundary of the property or properties

Alternatives	**Latitude (S)**	**Longitude (E)**
Preferred site	**29º 47" 50.48"**	**30º 53" 28.62"**
Alternative site 1	**None**	**None**

(C) A PLAN WHICH LOCATES THE PROPOSED ACTVITY OR ACTIVITES APPLIED FOR AS WELL AS ASSOCIATED STRUCTURES AND INFRASTRUCTURE AT AN APPROPRIATE SCALE.

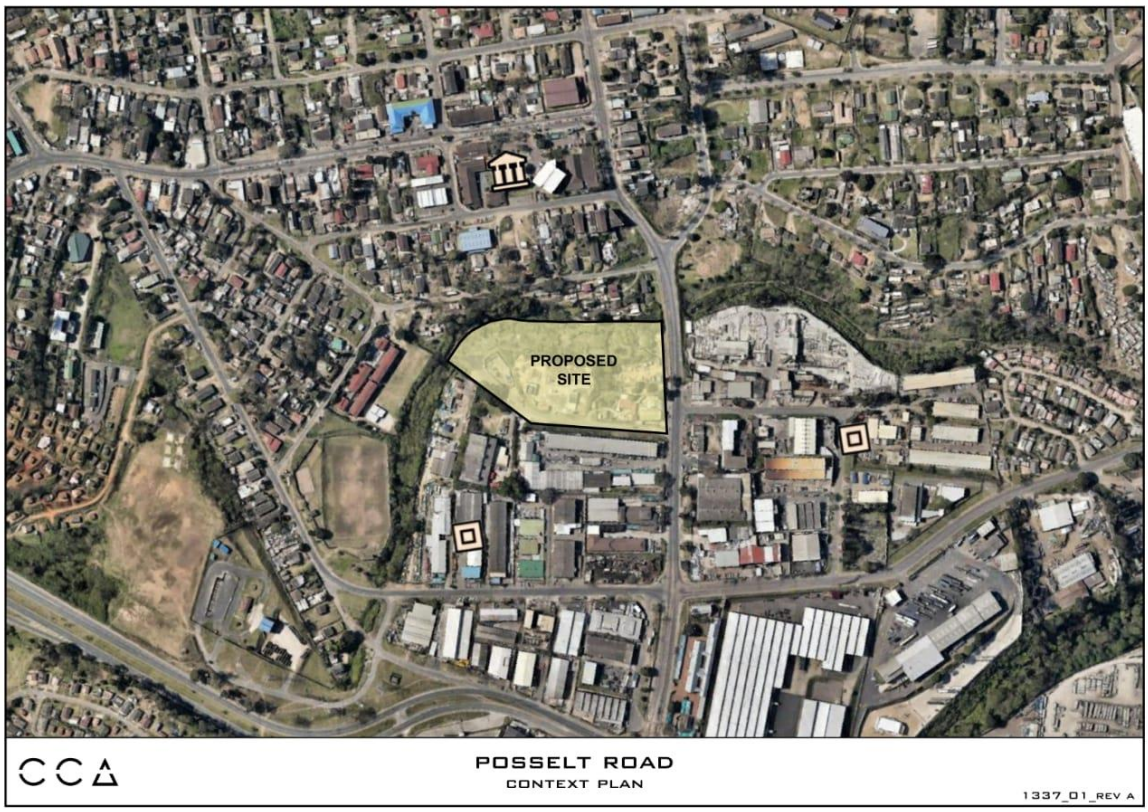

Figure 1 - Site for the proposed project

See attached site development plan – **Appendix A**

(i) A linear activity, a description and co-ordinates of the corridor in which the proposed activity or activities is to be undertaken

The proposed project is not a linear activity.

In the case of linear activities: N/A

Alternatives	**Latitude (S)**	**Longitude (E)**
Preferred site	**None**	**None**
Alternative site 1	**None**	**None**
Starting point of the activity		
Middle point of the activity		
End point of the activity		
Alternative site 2	**None**	**None**
Starting point of the activity		
Middle point of the activity		
End point of the activity		

(ii) On land where the property has not been defined, the co-ordinates within which the activity is to be undertaken

The proposed activity is not on land that has not been defined.

(D) A DESCRIPTION OF THE SCOPE OF THE PROPOSED ACTVITY, INCLUDING –

The project entails the construction of Mageza Service Station (New Germany) including associated infrastructure comprising fuel storage tanks [2 x 46 000 litres ULP], 1 x 46 000 litres diesel all underground, pumps, concrete slabbing & canopy, building on site comprising office, convenience shop, food outlets / drive thru, staffroom, kitchen and toilets. All buildings are single storey.

(i) All listed and specified activities triggered and being applied for

In terms of the Environmental Impact Assessment (EIA) Regulations 2014, as amended, promulgated in terms of the National Environmental Management Act, 1998 (NEMA), certain listed activities are specified for which either a Basic Assessment (GNR 327 and 324) or a full Scoping and Environmental Impact Assessment (GNR 325) is a requirement.

In this regard the following listed activity in Government Notice R 327 which is Listing Notice 1 is applicable, which require only a Basic Assessment process.

Indicate the number and the date of the relevant notice;	**Activity No(s) (in terms of the relevant notice)**	**Describe each listed activity as per the project description (and not as per wording of the relevant Government Notice)[1]:**
GNR. 327 of 2014 (Listing Notice 1) - as amended on 7 April 2017.	Activity No. 14 - the development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 but not exceeding 500 cubic meters.	In this instance, it is 138 000 litres of fuel that will be stored on site for commercial purposes in the form of a Filling Station.

Please note that any authorization that may result from this application will only cover activities specifically applied for.

[1]Please note that this description should not be a repetition of the listed activity as contained in the relevant Government Notice, but should be a brief description of activities to be undertaken as per the project description, i.e. describe the components of the desired development.

(ii) A description of the activities to be undertaken including associated structures and infrastructure

Background and proposed development

The pre – application meeting was held with the Department of Economic Development, Tourism and Environmental Affairs attended by the EAP and the applicant on 25 February 2020.

The proposed site is located at New Germany, on erf 92 New Germany, along Posselt Road, which links with Clermont Road towards Clermont Township. Linking to the site are various roads i.e. Rodger Sishi, Schwegmann, Rawat and Posselt itself. The latter is the main road which links vehicular traffic with the proposed site and the road is tarred and in a relatively good condition.

In the vicinity of the site are shops of various kinds and some industries. There are derelict buildings on site that will be demolished. According to the Heritage assessment the area is highly developed with no heritage sites and buildings. No buildings were recorded on the 2000 topographical map, and thus the buildings post – date 2000.

The site is currently zoned general industrial, and the filling station is a free entry, however a special consent is required for the food outlet which forms part of the Service Station. The special consent application is currently underway.

As highlighted above the project entails the construction of a service station with a food outlet / drive thru.

Project Overview

The total site area is 23 237m², of which the Service Station with food outlets will occupy 5 349m² on the front side of the site as Phase 1. The site will have a fuel Service Station with a food outlet / drive thru in single storey complex, parking bays and infrastructure for basic services. The Convenience store will take (280m²) and fast food outlet / drive thru (200m²).

The rest of the site will be developed sometime in future. The current application is specifically for the first phase comprising the Service Station and food outlet / drive thru.

Project objectives

The main objective of the project is to provide fuel and take away food to customers in the vicinity, and those travelling along Posselt road. The Facility will also provide sustainable jobs as close as possible to the people of Clermont and the surrounding communities.

Services on site

Sewerage

The area has well developed sewer infrastructure, and it will be a matter of connecting to the proposed project buildings following the procedure set by eThekwini Municipality. This is critical given the fact that the development will produce sewerage from ablution facilities and grey water from hand basins, washing facilities and shops. There will be no bulk transportation of sewerage. It is also not foreseen that the sewerage volumes will be so high as to be a challenge to the local municipal Waste Water Works. However, this report will be submitted to eThekwini Municipality, including its

Department of Water and Sanitation for comments.

Portable water

The area where the proposed project is located has portable water infrastructure. It will be a matter of connecting to the site. Rainwater harvesting will also be promoted by the project.

Stormwater Infrastructure

The Stormwater Plan has been compiled by Nature Stamp for this site for the purposes of controlling all runoff emanating from the site (attached as **Appendix D (5))**. This will assist in ensuring that run off is reduced to predevelopment states, and that runoff is not concentrated onto any adjacent or neighbouring properties.

The storm water will be channelled to the existing authorised stormwater drainage system to the satisfaction of eThekwini Municipality. In this regard the applicable design standard is that of eThekwini Municipality: Design Manual: Guidelines and Policy for the design of Stormwater Drainage System.

The Stormwater Management design principles as put forward by Nature Stamp will include the following:

- The establishment and maintenance of grass and plants adjacent to newly constructed infrastructure.
- Hazardous or environmentally dangerous chemicals kept on site must be kept outside of the 1:00 year flood line and wetlands or appropriately bunded.
- Groundcover should be maintained during construction to ensure erosion protection.
- Flow concentration points should avoid unstable soil areas and/or stockpiles.
- All pollution from the surfaces should not flow directly into water resources.
- Ensure aesthetic designs.

Roads

The site access of the proposed development will be off Posselt Road. Posselt Road is a 11m wide, two-way single carriageway Class 4 municipal road. It is aligned in an east – west direction. The alignment of Posselt Road within the study area can be described as having moderate vertical and horizontal curves. It has a speed limit of 50km/h. There are street lights on the southern edge of this road and sidewalks along both sides of the road. There is a public transport layby on Posselt Road adjacent to the proposed development.

The shoulder sight distance for a 50km/h road for a truck and trailer, which is the worst-case scenario, is 170m. This is achievable from the site access on Posselt Road so long as there are no obstructions to the view in the sight triangle in either direction of the access.

As indicated the site is easily accessible from Posselt Road, which links with Clermont Road towards Clermont Township. As indicated above, linking to the site are various roads i.e. Rodger Sishi, Schwegmann, Rawat and Posselt itself. The latter is the main road which links vehicular traffic with the proposed site and the road is tarred and in a relatively good condition.

The proposed access road, as well as all internal circulation and parking areas will be designed and constructed in accordance with the recommendations and standards of eThekwini Municipality and Traffic Impact Assessment conducted for the site.

Electricity

The existing buildings on site are already connected to eThekwini municipal grid. The new proposed development will have to do the necessary connections based on the comments and requirements of eThekwini Electricity Department. There is a power line

servitude at the back of the site. eThekwini Municipality will be contacted with regard to capacity.

The applicant will consult with eThekwini Electricity's main records for underground electrical services on site. Discussions will also be with regard to any possible encroachment onto the eThekwini Electricity's servitude in respect of the proposed project. However, as a norm no structure may be placed within 12 metres from the centre line of the powerline or either side without the written confirmation of the relevant Authority.

Refuse

Refuse will be stored on site just behind the Convenience shop as shown in the layout, in a well-constructed 15 m² bin area before disposal. eThekwini Municipality will be requested to collect solid waste once a week, alternatively a private service provider can be arranged for the collection of solid waste from the facility.

It is anticipated that the project will generate the following types of waste:

Construction phase

General waste – the general waste likely to be generated during the project construction include litter from workers on site like plastics and papers. The suppliers and construction in general are likely to generate cans, papers and empty cement bags.

Hazardous – hazardous waste is defined as waste that poses substantial or potential threat to public health and the environment. This includes waste that tends to ignite, reactive, corrosive and toxic. The anticipated waste include metal, oil spills, concrete remnants, asphalt, chemical waste during construction and paint containers. Hazardous chemical substances must be inventoried and stored in accordance with the requirements of the safety data sheet, the EMPr and the Norms and Standards for the storage of waste

Operational phase

General waste – paper and cans, cardboards, plastics and food remaining in the restaurant.

Hazardous waste – It is anticipated that the operational phase will generate chemical waste, oil, oil cans and petro chemicals during the operational phase. This type of waste has to be landfilled in the landfill that is authorized to take such waste. As highlighted above all type of chemicals must be stored in line with the legislated standards. This type of waste will be managed, handled and disposed by the private specialized service provider to be engaged.

Solid waste will be stored at the designated "storage area" within the premises, and be collected once a week by either the Municipality or private registered service provider for disposal at the municipal landfill site. It is anticipated that the stored waste before collection will be below the threshold of 100m³, too little to warrant a waste license in terms of GN 718: Category A; B & C. Should the storage of waste increase in future, the frequency of disposal will be increased.

The project will promote the recycling of material like paper, glass, tins and plastic bottles and do separation at source. The recycling is also anticipated to be below 10 tons per month.

Construction and phases

It is anticipated that the project will take about 9 months to complete, if the environmental authorisation is granted. However, like any project of this nature there could be external variables and influences which cannot be controlled by the applicant. The applicant will request the maximum timeframe allowed for the validity of a decision.

The construction phase will follow the conditions of the Environmental Authorisation, Environmental Management Programme and recommendations of Specialists studies.

Filling station and underground tanks

All tanks will be composite type tanks to be stored underground. This area is further expanded under the EMPr, but it has to be stated that the SAB specifications and guidelines will be complied with, which will include:

- SABS 089 – 3 1999 – the installation of underground storage tanks, pumps / dispensers and pipes.
- SABS – 0140 – 2 – Identification of colour markings (identification of hazards and equipment).
- SABS 62-1 & 62 -2 – steel pipes fittings.
- SABS 1123 – steel pipes flanges.
- SABS 12000 – standardised specifications for construction.
- SABS 1535 – polyester coated steel tanks for the underground storage for hydrocarbons and oxygenated solvents.

Accordingly, the underground storage tanks will comply with relevant SANS / SABS codes of Practice which include: SANS 10400 TT 53, SANS 10131, SANS 10108, SANS 11535 and SANS 10089 Part 2 & 3.

The underground storage tanks will be accordingly fitted with an overfill protection device. The tanks will be designed as to reduce risk of possible soil and groundwater contamination. As an extra precautionary measure, the underground storage tanks will be dipped daily and reconciled against volumes to establish any possible loss attributed to leakage. The conditions of the tanks, pipes and monitoring wells will be inspected on regular basis. The underground tanks and products will be pressure tested prior to the actual commissioning. The tanks will be underground as opposed to above the ground, in order to eliminate the risk of fire.

Although the issue of the stormwater is addressed separately, but the following must be emphasized as far as they relate to fuel, oil and possible contaminants:

- Storm water, petrol, diesel and other polluted run-off must be directed to the containment sump of appropriate design.
- Storm water leaving the premises shall not be polluted by any substance whether such a substance is a solid, liquid, gas vapour or any combination of these.
- There must be no mixing of contaminated and uncontaminated water.
- Clean storm water must be separated from contaminated storm water.

(E) A DESCRIPTION OF THE POLICY AND LEGISLATIVE CONTEXT WITHIN WHICH THE DEVELOPMENT IS PROPOSED INCLUDING –

(i) An identification of all legislation, polices, plans, guidelines, spatial tools, municipal development planning frameworks, and instruments that are applicable to this activity and have been considered in the preparation of the report

Legislation	Authority	Year
National Environmental Management Act	Department of Economic Development, Tourism and	1998

	Environmental Affairs (EDTEA) / Department of Environment, Forestry and Fisheries (DEFF)	
EIA Regulations, 2014	EDTEA / DEFF	2014
Guideline:5 Assessment of Alternatives and Impacts in support of EIA Regulations	EDTEA / DEFF	2006
Guideline on Need and Desirability, Department of Environmental Affairs	EDTEA / DEFF	2017
Petroleum Products Act, 1977 (Act 120 of 1977) as amended. – Petroleum Products site and retail license Regulations 2006	Department of Energy	1977 and 2006 respectively
Pollution Prevention Act (APA) (Act No. 45 of 1965)	EDTEA / DEFF	1965
National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)	EDTEA / DEFF	2004
The National Water Act	Department of Water and Sanitation	1998
National Environmental Management: Waste Act	EDTEA / DEFF	2008
National Environmental Management: Biodiversity Act	DEDTEA / DEFF	2004
Alien and Invasive Species Regulations	EDTEA / DEFF	2014

KwaZulu-Natal Amafa and Research Institute Act, Act No. 5	KwaZulu – Natal Amafa and Research Institute	2018
National Heritage Resources Act National Heritage Council Act	Heritage Council Heritage Council	1999 1999
South African Constitution	RSA	1996
Promotion of Administrative Justice Act	Department of Justice	2000
Occupational Health and Safety Act, 85 of 1993	Department of Labour	1993
National Forests Act	DEFF	1998
Noise Control Regulations (Regulations 154, 10 January 1992)	EDTEA / DEFF	1992
Hazardous Substances Act (Act No. 15 of 1973)	EDTEA / DEFF / eThekwini Municipality / Department of Energy	1973
SANS 10400 amendments, in terms of the National Building Regulations and Building Standards Act, No. 103 of 1977, as amended	eThekwini Municipality	1977
National Development Plan	RSA Government Departments, Municipalities and Public Entities	2011
eThekwini Municipality Integrated Development Plan (IDP)	eThekwini Municipality	2019 / 2020
Spatial Planning Land Use Management Act (SPLUMA)	eThekwini Municipality	2013

(iii) How the proposed activity complies with and responds to the legislation and policy context, plans, guidelines, tools frameworks, and instruments

Legislation, polices, plans, guidelines, spatial tools, municipal development planning frameworks and other instruments	**Compliance and applicability**
National Environmental Management Act	Promulgation is as per this Act
EIA Regulations, 2014	The whole process has to comply with these Regulations. This is in line with the EIA Regulations as promulgated in terms of the National Environmental Management Act, 1998 (NEMA). In this regard it is 138 000 litres of fuel that will be stored on site as triggered by GNR. 327 of 2014 (Listing Notice 1) as amended on 7 April 2017, activity No. 14.
Guideline:5 Assessment of Alternatives and Impacts in support of EIA Regulations	These Guidelines are applicable in terms of the exploration of alternatives.
Guideline on Need and Desirability, Department of Environmental Affairs	In terms of these guidelines the need and desirability of the project has to cover certain specifics like training, safety, service delivery, benefits to the local people and the alignment of planning related issues to the project.
Petroleum Products Act, 1977 (Act 120 of 1977) as amended. – Petroleum Products site and retail license Regulations 2006	This relates to the control of petroleum products, site and retail licenses in this regard.
Pollution Prevention Act (APA) (Act No. 45 of 1965)	This may be applicable in case of dust on site.
National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004)	This may be applicable in case of dust on site.
The National Water Act	The activities that may affect water resources on site e.g. wetlands, groundwater resources and a nearby watercourse.
KwaZulu-Natal Amafa and Research Institute Act	The legislation relates to heritage objects in case there are heritage resources on the site in question.
South African Constitution	Section 24 of the South African Constitution impress upon everyone having the right to an environment that is not detrimental to health.
National Forests Act	This legislation safeguards against the destruction of forests and indigenous that may be found on site.
Noise Control Regulations (Regulations 154, 10 January 1992)	This relates to any noise that may need to be controlled during construction and operational phases of the project.
Hazardous Substances Act (Act No. 15 of 1973)	The act regulates the working of chemicals and hazardous substances.
National Environmental Management: Waste Act	All waste related issues are governed by this legislation e.g. appropriate disposal of solid waste during construction and operational phases.
Occupational Health and Safety Act	Safety and Health issues on site, especially during construction and beyond.
SANS 10400 amendments, in terms of the National	This has to accompany the building plans submitted

Building Regulations and Building Standards Act, No. 103 of 1977	to the Municipality.
National Forests Act (Act 84 of 1998), 1998	The Act is applicable to the site as it comprises of indigenous vegetation.
National Development Plan	This relates to issues of job creation, economic activities, rural employment and inclusive rural development, environment challenges and the need for sustainable development. The plan speaks about creating 11 million net new jobs over the period and reducing the rate of unemployment to about 6% by 2030.
eThekwini Municipality Integrated Development Plan (IDP) 2019/2020.	The project is in line with the ethos of the eThekwini Municipality's IDP document.
Spatial Planning Land Use Management Act (SPLUMA)	The Act is responsible for planning related issues within local government. This assist in ensuring integration and coherence with respect to planning issues within a municipal area.

(F) A MOTIVATION FOR THE NEED AND DESIRABILITY FOR THE PROPOSED DEVELOPMENT INCLUDING THE NEED AND DESIRABILITY OF THE ACTIVTY IN THE CONTEXT OF THE PREFERED LOCATION

The proposed Mageza Service Station (New Germany) would be well situated along Posselt Road and is likely to have a desirable effect in the area as it will complement the area. The project is likely to provide job and subcontracting benefits to the locals during pre-construction, construction and operational phases.

The development of the project will play an import role in addressing some of the development challenges facing eThekwini and the KwaZulu – Natal Province through the creation of jobs. The 2019/2020 eThekwini Municipality's integrated development plan (IDP) states that unemployment rate for eThekwini increased to 27.1% in Q2 2018 from 26.7% in Q1 2018. It is also important to note that the labour force absorption rate showed an insignificant increase 0.4% (from 45.8% to 43.1%), and the participation rate decreased (from 59.31% to 59.1%) over the same period, indicating that there are more people looking for employment, and the likelihood of them finding employment has decreased. In terms of skill levels, the largest portion of the workforce is employed at semi-skilled level followed by skilled and low-skilled. This project will go a long way towards achieving some of eThekwini 's stated strategic goals. The unemployment rate in South Africa is known to be contributing immensely to the social ills the country is currently experiencing.

At times the impact of unemployment on society is often underestimated; whereas it includes factors like psychological harm, loss of work ethic, self-confidence, increase in ailments, disruption of family and social relations, increase in social exclusion and accentuation of race and gender tensions. In this regard the project is mindful of the challenge, and intends contributing in a holistic and balanced manner.

Overall, the Facility will provide livelihoods to the local people and enhance local economic development. The developer has indicated a strong commitment to the upliftment of the locals. The locals will also be engaged at the appropriate stage to participate in the recycling programme.

The proposed development is well located along a high mobility corridor and will thus provide convenience to motorists travelling along Posselt Road to either the Clermont Township or to Pinetown and beyond. The proposed development does not only feature a Service Station, but also include a drive thru that will benefit those who want to buy take aways on their way home or those who want to buy quick lunch as the development is located within an industrial area. The project will also cater for the people attending functions at Sugar Ray Xulu Stadium at Clermont which is a few kilometres from the proposed Service Station and food outlet drive thru.

The site visit has shown a lot of litter being dumped by people who use pathways crossing a watercourse to the local areas and industries in the vicinity of the proposed Facility. The proposed project will ensure a clean environment around the Facility, and this will contribute in the water quality improvement of the watercourse and surrounding areas. Alien plants that have invaded parts of the site and along the riparian vegetation will also be eradicated improving the habitat for fauna, as indigenous plant species will be planted.

The drive thru by its very nature is labour intensive, and in this instance likely to employ a lot of people compared to an ordinary food outlet. The proposed development is market feasible as evidenced by the attached Market Feasibility Study.

The proposed development is also proposed on the site with existing buildings trading in the main as a shop. The existing buildings will be demolished to make way for the proposed development. In this way the proposed development will not require massive new engineering services, which may have impacted on the environment if the new services were to be put on site.

The proposed development will unfold in line with the following project phases:

i. Pre-construction phase and planning

This phase offer opportunities that are provided by the project to the local professional service providers whenever the skills are available. It does also offer limited opportunities for manual work e.g. the digging of trial pits.

ii. Construction phase

This phase is highly technical in terms of engineers, artisans and the like, but also make provision for the manual worker and opportunities for the local suppliers and small sub-contractors. Manufacturers of materials will create employment and increase economic activities. Transporter of materials will create jobs in their sector. The utilization of skilled workers and training of less skilled workers in the construction will take place on site. The opportunity afforded to unskilled workers to work and interact with skilled personnel will assist in the informal transfer of skills with long term benefits. There will be an opportunity as well for licensed informal traders to do business when construction is underway on site.

iii. Operational phase

Provision of sustainable and permanent jobs to the locals through the Service Station and the drive thru. The developer has indicated his desire to employ and prioritise local people, and this will have an advantage of shorter travelling distances for the locals from the nearby Clermont township, thus saving in travelling costs.

Looking at the guideline on need and desirability publication, compiled as part of the EIA Guideline & Information Document Series, one has found it very helpful in further assessing this development. It tends to focus on planning tools like the IDP, SDF and EMF. The said guideline provides a list of 14 aspects, which must be considered. The points below indicate how different aspects have been addressed for the proposed development.

1. Is the land use (*associated with the activity being applied for) considered within the timeframe intended by the existing approved Spatial Development Framework (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).*

Response: The project falls within eThekwini Metro whose IDP (2019 – 2020)'s long term vision among other things talks about its commitment to achieving a Vision of "Being Africa's Most Caring and Liveable City" through the effective and efficient delivery of basic services, and its intention to invest in areas that will make the greatest social and economic impact within the City. It also talks about the importance of local economic development. The proposed project will go a long way in meeting some of these aspirations, in particular the local economic development aspects as contained in the municipal strategic documents.

2. *Should development, or if applicable, expansion of the town/area concerned in terms of this land use (associated with the activity being applied for) occur here at this point in time?*

Response: As highlighted above, the identified site is located in an ideal position along Posselt Road at the border of New Germany and Clermont township. The site is zoned general industrial, with existing buildings that will be demolished as soon as all authorsations are in place. The site is surrounded by a mix of land uses including industries and some shops. The current zoning allows the Service Station as a free entry, and the subdivision and special consent is currently underway for the food outlet and drive thru. The proposed project will also be located a few kilometres from the 2010 iconic Clermont's Sugar Ray Xulu Stadium.

3. *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).*

Response: This project is likely to enhance the area in terms of its location. At a local level the project is likely to provide sustainable jobs. The timing is perfect in the context of economic devastation caused by Covid 19 pandemic. During the meeting held with the ward leadership on 24 June 2020 the project was unanimously supported as captured in the attached notes.

4. *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?*

Response: The area in question has engineering services in the form of electricity, sewer infrastructure, refuse collection service and portable water infrastructure.

5. *Is this development provided for 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)?*

Response: The project is located within a well serviced municipal area.

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

Response: Yes, in terms of reducing unemployment and poverty in South Africa.

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

Response: The Service Station with food outlets will occupy 5 349m² on the front side of the site as Phase 1, out of a site of 23 237m² in extent. The project will be located 32 metres away from the watercourse. The proposed development is a free entry in terms of the current site zoning, save the food outlet that will require a special consent.

8. *Would the approval of this application compromise the integrity of the existing approved and credible municipal IDP and SDF as agreed to by the relevant authorities?*

Response: No, the project will actually enhance the goals of the IDP i.e. local economic development while ensuring environmental sustainability. The area is zone General Industrial, with the Service Station as a free entry.

9. *Would the approval of this application compromise the integrity of the existing environmental management priorities for the area (e.g. as defined in EMFs), and if so, can it be justified in terms of sustainability considerations?*

Response: As highlighted above the project will be away from the river by 32 metres, and no indigenous tree species will be affected by the project as it will be on the area that has buildings already which will be demolished. The layout has already been adjusted to be 32 metres away from the edge of the watercourse to the project boundary. As much as the area adjacent to the river / watercourse has been identified by eThekwini Municipality as Durban Metropolitan Open Space System (D'MOSS) but the project will not encroach on it. In addition, eThekwini Municipality is being afforded an opportunity to comment on this draft basic assessment report and associated specialists' studies.

10. *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).*

Response: The proposed facility is proposed in an ideal location in terms of engineering infrastructure, transport network, visibility and accessibility. As highlighted above the site is on an area zoned general industrial which allows this development as free entry, with food outlet requiring a special consent.

11. *How will the activity or the land use associated with the activity applied for, impact on sensitive natural and cultural areas (built and rural / natural environment)?*

Response: As indicated above, the development will occupy 5349 m² out of the site of 23 237m². The project will not impact on the indigenous tree species and riverine vegetation, as it will be on the area that has been occupied by buildings for many years, and these will be demolished. Furthermore, both the hydrological and watercourse assessments conducted on site revealed that the nearby watercourse and its surrounding is high disturbed, with poor water quality.

12. *How will the development impact on people's health and wellbeing (e.g. in terms of noise, odours, visual character and sense of place, etc)?*

Response: The proposed development does not produce any emissions, save the fumes that may be coming from the fuel during fill up. In terms of the visual character and sense of place the site is located in a well-developed area in the context of urban built environment.

13. *Will the proposed activity or the land use associated with the activity applied for, result in unacceptable opportunity costs?*

Response: No.

14. *Will the proposed land use result in unacceptable cumulative impacts?*

Response: No.

(G) A MOTIVATION FOR THE PREFERED SITE, ACTIVITY AND TECHNOLOGY ALTERNATIVE

As per GN. R 326, Appendix 1(2)(b), alternatives for the proposed development are to be identified and considered, and this is in line with the definition under Chapter 1 of the EIA Regulations, interpreting alternatives as "in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to the –

a. Property on which or location where the activity is proposed to be undertaken;
b. Type of activity to be undertaken;
c. Design or layout of the activity
d. Technology to be in the activity;
e. Operational aspects of the activity

And includes the option of not implementing the activity"

This approach compels the developers and assessors to consider other potential land uses and possible future land uses for the site under assessment.

Preferred site and alternative layout

The developer has secured this site for this specific activity, and there is no other site available to the developer within the immediate surroundings. Furthermore, the site is already zoned General Industrial with the Service Station as a free entry, however a special consent application is underway for the food outlet / drive thru. The site is ideally located within a well-established transport network area on Erf 92 New Germany, Durban, at the border of New Germany and Clermont township.

The proposed site was found to be suitable for this project based on the following factors:

- The site is located along Posselt Road at the border of New Germany and Clermont township, highly visible, making it an ideal location from the business perspective.
- The site is attractive from the business perspective with regard to accessibility and visibility.
- The site is already zoned General Industrial and the proposed Service Station is therefore an allowed land use.
- The site has enough space for the buildings and parking.
- It is anticipated that sustainable jobs will be created for the surrounding community.
- Studies conducted on site have not identified any fatal environmental flaws, but recommended mitigation measures for certain impacts.
- The proposed development does not seem to be in conflict with the development plans of eThekwini Municipality, save the fact that eThekwini is still going to provide comments on the draft report.
- The traffic impact assessment study has recommended the proposed development, from the traffic perspective.

Alternative site

There is no alternative site for this proposed development. As indicated above, this site is bought for this specific purpose due to its ideal location. It will not make any sense to leave this site and go for another one while this one is already zoned for the activity that is allowed.

However, it must be pointed out that the whole site is being subdivided, and the Service Station will be on the road side of the site, as opposed to the back which may not be easily accessible.

The site development plan had to be adjusted to ensure the project does not encroach onto the 32 metre buffer.

Technology alternative

The underground storage of tanks is highly controlled and regulated in South Africa through South African Bureau of Standards (SABS) Specifications and Codes, Guidelines and various South African National Standards (SANS).

There is no specific "special" technology considered for the proposed project, except that the project construction will follow the guidelines of the National Home Building Council (NHBC) with regard to construction specifications. SASOL is an experienced Petroleum Company in South Africa, and is familiar with technological aspects within the industry.

As indicated above there will be heavy reliance on SANS codes of practice as specified for the underground storage tanks and associated fuel handling infrastructure. The COTO specifications will be used during construction of roads, kerbs and forecourt.

(H) A FULL DESCRIPTION OF THE PROCESS FOLLOWED TO REACH THE PROPOSED PREFERED ALTERNATIVE WITHIN THE SITE, INCLUDING:

(i) (a) Details of all the alternatives considered

No alternatives considered as per the reasons furnished under (g) above, and information furnished.

(b) No-go alternative

The no-go option is defined as an option of not undertaking the proposed activity and its associated alternatives. In this instance this will mean retaining the entire site in its current natural state, albeit with a degree of degradation.

The proposed activity and facility will afford the local people an opportunity to be employed, and this contribute in alleviating poverty. If this option is not pursued the unemployed are likely to lose out in terms of potential job opportunities that are likely to be created by this development. This is particular true for the locals who are unskilled, especially during the construction and operational phases. The local small businesses are also likely to benefit during the project construction phase. The no go option will mean the loss of permitted informal trading during construction phase of the project. The facility will provide permanent jobs for those who will be employed when the facility is operational.

There will be a loss of savings on distance travelled to work. There will be a loss of economic development with regard to the neighbouring Clermont township.

There will be a loss of local economic empowerment and other opportunities like subcontracting, supplying material and permitted trading during construction. There will be loss of revenue generation by the Municipality in future through rates, which in turn assist in service delivery.

The no-go option from another perspective will mean no development on this site and landscape. There will be not a slightest chance for soil and water contamination. There will be no risk of petroleum products polluting the underground water resources.

(ii) Details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs

The project has followed the standard public participation process as contemplated under Regulation 41 of the 2014 EIA Regulations, as outlined below.

- Site notice board – notices were displayed on site on a visible location for a continuous period of 30 days. A picture of the notice that was displayed on site as contemplated under Regulation 41 (3) is attached – see **Appendix B (1).**
- Public meeting – the public meeting was reduced to a meeting of the ward committee, ward Councilor and Proportional Representative (PR) Councilor representing Clermont due to restrictions with regard to gatherings as agreed with the local leadership. The meeting was held on 24 June 2020 at Clermont ward councilor's office at 14.00 – see attached notes - **Appendix B (3).**
- The newspaper advert was published in the iSiZulu newspaper, Isolezwe dated 22 June 2020; and English newspaper, The Mercury dated 23 June 2020 - **Appendix B (6) (i) and (ii).**
- Draft Basic Assessment Report (BAR) circulation / Written Notices – a register of Interested and Affected parties has been compiled.
- Notification letters / e-mails have been sent to the relevant stakeholders inviting them to comment on the project.

(iii) A summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or reasons for not including them

Over and above the TABLE below, a TABLE of Comments and Responses Report will also be attached. See also the list of a Register of interested and affected parties.

Organisation (I & A party)	**Issue / concern raised**	**EAP's response**	**Incorporation / Non-incorporation and reasons thereof**
KwaZulu – Natal Amafa and Research Institute	KwaZulu – Natal Amafa and Research Institute is the custodian for heritage in KZN Province. **Comments will be attached as - Appendix B (8).**	Umlando Archaeological Surveys and Heritage Management has been appointed for this project to assess archaeological / cultural heritage, paleontology theme and age of buildings on site. As indicated in their report attached as	The normal standard recommendations of Amafa will be incorporated onto the EMPr. Should any heritage objects be found on site during earthworks, operations must be stopped and

		Appendix D (4), the site review of the database and historical maps revealed that the area has no known heritage sites. The area is highly developed with no heritage sites and buildings. No buildings were recorded on the 2000 topographical map, and thus the buildings post-date 2000. The PIA sensitivity map showed the area as of no significance. The report has been lodged with KwaZulu – Natal Amafa and Research Institute for their comments.	the matter reported to KwaZulu – Natal Amafa and Research Institute immediately.
Department of Human Settlement, Water and Sanitation (DHWS)	Department of Human Settlement, Water and Sanitation to provide comments as per their constitutional function. Comments from DWS will be attached as **Appendix B (9)).**	DWS has been furnished with this draft report for their comments.	All the recommendations of DWS will be incorporated into the EMPr.
Department of Agriculture, Forestry and Fisheries (DAFF).	The Department of Agriculture, Forestry & Fisheries is the authority mandated to regulate activities affecting natural forests and tree species protected in terms of National Forest Act. Their comments will be attached as **Appendix B (10)).**	The draft report has been sent to DAFF for their comments from their perspective.	Their comments will be incorporated onto the EMPr.
Department of Mineral Resources and Energy	The Department Mineral Resources and Energy will be the final Department to authorise the Fuel Service Station.	The draft Basic Assessment report will be forwarded to the Department of Mineral Resources and Energy for comments.	Their comments will be incorporated onto the EMPr.

eThekwini Municipality	eThekwini Municipality is the local authority under whose jurisdiction the subject site falls. Comments from eThekwini Municipality's various Departments will be attached as **Appendix Appendix B (4)** Some of the commenting Units / Departments are: • ***eThekwini Electricity Unit*** • ***Environmental Planning and Climate Protection Department (EPCPD)*** • ***Land Use Management Branch*** • ***Strategic Spatial Planning Branch Coastal, Stormwater and Catchment Management*** • ***Parks, Leisure and Cemeteries*** • ***Pavement and Geotechnical Engineering Branch eThekwini Transport Authority*** • ***Environmental Health Department*** • ***eThekwini Water and Sanitation Unit*** • ***Cleansing and Solid Waste Unit*** • ***Disaster Management Unit*** • ***Fire Safety Department*** • ***Any other***	The draft report has been sent to eThekwini Municipality for comments.	Recommendations will be taken into consideration and conditions incorporated onto the EMPr.
Fuel Retailers Association.	This is an industry association which is an interested stakeholder. Comments will be attached as **Appendix 16.**	The draft report has been forwarded to the Association for comments.	Comments will be incorporated accordingly, if received.

Department of Economic Development, Tourism and Environmental Affairs.	EDTEA is the Department mandated to authorize environmental applications in the Province of KZN. Comments will be attached as - **Appendix 17).**	The draft report has been forwarded to the Department for comments.	The comments of EDTEA will be incorporated onto the final Basic Assessment report.

(iv) The environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects.

(Preferred site)

Geographical and physical attributes

Topography

The site is moderately sloping in a north southerly direction. There is a stream flowing in the southerly direction going under the bridge separating New Germany and Clermont Township. The area adjacent to the river (riparian area) in heavily infested with alien plants. The site is bounded to the north by an informal recycling site, to the south and west by Posselt Road and Rawat Road respectively and to the east by a southward flowing stream which has been designated as D'MOSS by eThekwini Municipality.

Land Use character

The site is located on the upper point of the area before starting to slope down. The proposed site is surrounded by a mix of residential and industrial land uses. The site has buildings that will be demolished, with industries neighbouring the site. The site is zoned general industrial.

Climate

The site experiences warm and temperate weather with summer rainfall and cold winters. The area is characterized by high humidity and does not experience frost. The mean annual precipitation is about 978 mm.

Description of ecological baseline

Vegetation and Fauna

Vegetation

This site is found within the KwaZulu-Natal Coastal Belt vegetation type (CB 3, Mucina and Rutherford, 2006). The desktop analysis revealed that the area is endangered and is hardly protected and has 49.7 % remaining habitat. The following information was collected for the vegetation unit CB 3 (Mucina & Rutherford, 2006; Scott-Shaw & Escott, 2011):

- **Distribution:** KwaZulu-Natal Province: Long and in places broad coastal strip along the KwaZulu-Natal coast, from near Mtunzini in the north, via Durban to Margate and just short of Port Edward in the south.
- **Vegetation and Landscape features:** Highly dissected undulating coastal plains which presumably used to be covered to a great extent with various types of subtropical coastal forest (the remnants of one of which are described in Chapter 12 as Northern Coastal Forest). Some primary grassland dominated by Themeda triandra still occurs in hilly, high-rainfall areas where pressure from natural fire and grazing regimes prevailed. At present the KwaZulu – Natal Coastal Belt is affected by an intricate mosaic of very extensive sugarcane fields, timber plantations and coastal holiday resorts, with interspersed secondary Aristida grasslands, thickets and patches of coastal thornveld.
- **Vegetation and Landscape features:** Hilly, undulating landscapes and broad valleys supporting tall tussock grassland usually dominated by *Hyparrhenia hirta*, with occasional savannoid woodlands with scattered *Acacia sieberiana var woodii* and in small pockets with *A. karroo* and *A. nilotica*.

However, on site where the Service Station and food outlet is proposed a different picture was observed. The site was visited on 27 January 2020 to do the site walk assessment including the identification of vegetation occurring on site. It was observed that all vegetation is occurring outside the footprint, as the project will be on where there are buildings and structures at the moment. Generally, the whole property is highly transformed by urban sprawl and severely encroached by alien invader plants.

The site is located between an industrial area and Clermont township across the river, and people walk along the river every day to the nearby industries and use the area as a thoroughfare to New Germany.

During the site visit illegal dumping and litter in the form of papers, bottles and glasses were observed on site causing land pollution. The grassland near the river has been turned into an illegal dumping site, which tends to destroy vegetation. It is likely that the illegal dump observed does reach the river during the rainy days and impact on the aquatic fauna.

The area has been completely taken over by alien invasive plants, with very few indigenous plants and perennial plants.

Looking at the impact of the proposed development on vegetation, the development will not impact on vegetation as vegetation area is located outside of the development footprint.

Invader plants

Invasive alien plant species (IAP) are species whose introduction and/or spread outside their natural distribution threaten biological diversity. They are non-native to an ecosystem and may cause economic or environmental harm. They impact negatively on biodiversity, including decline or elimination of indigenous species – through competition for water and the disruption of local ecosystems and ecosystem functions. IAPs, introduced and/or spread outside their natural habitats, have affected natural biodiversity in almost every ecosystem type on earth and are one of the greatest threats to biodiversity.

Without natural enemies, these plants reproduce and spread quickly, taking valuable water and space from our indigenous plants. Many alien plants consume more water than local plants, depleting our valuable water resources. Thick alien vegetation can also provide fuel for veldfires, making them exceptionally hot, which damages the burnt areas soil structure. IAPs cost South Africa tens of billions of rand annually in lost agricultural productivity and resources spent on removing or managing them. IAPs are a major threat to

biodiversity in catchment areas, potentially disrupting the delicate natural balance in ecosystems. As we depend on biodiversity for water, food, wood, clean air, medicine and much more, it is vitally important that we protect this resource. (Grain SA, April 2017)

Below is the list of the alien plants identified on site:

Table 1: Alien invasive plants identified on site

Scientific Name	***Common Name***
Bidens pilosa	Black jack
Lantana camara	Tickberry (common lantana)
Solanum lycopersium	Tomato
Acacia mearnsii	Black wattle
Acacia podalyriifolia	Old silver wattle
Ricinus Communis	Castor oil plant
Mangifera indica	Mango Tree
Tecoma stans	Yellow trumpetbush

The area is degraded and infested with alien plant species. The alien plant eradication programme need to be implemented, especially to safeguard the remaining vegetation and plants.

Grass species

The grass family is one of the most important families in the world. It forms the very basis of many ecosystems and all animals are therefore either directly or indirectly dependent on them for survival. Grasses are used as a food source; they provide shelter for a huge range of organisms, and they protect the soil from being degraded which leads to erosion.

Grassland is a complex ecosystem which supports a huge variety of organisms such as insects, frogs, reptiles, birds and mammals which includes our large herbivores. Many species use the grassland to build nests, forage for food, and use as shelter.

Table 2: Grass species identified on site

Scientific Name	**Common Name**
Digitaria eriantha	Common finger grass
Cynodon Dactylon	Couch grass
Eragrostis curvula	Weeping love grass
Sporobolus africanus	Rat's – tail Dropseed

There were indigenous tree species found on the riverine vegetation along the river comprising of the species as per the table below:

Table 3: Below is the list of tree species recorded on site

Scientific Name	Common Name
Syzgium cordatum	Umdoni
Senna didymobotrya	African Senna
Typha latifolia	Cattail

Sedges

Table 3: Below is the list of species recorded on site

Scientific Name	Common Name
Cyperus polystachyos	Bunchy sedge

Fauna

There has been no faunal assessment on site as the area will in any event not be affected by the project. Not much of faunal species were observed during the site visit. No species of conservation significance are likely to occur on this site due to its degraded nature, and pedestrian traffic on the site.

Even if there were species like millipedes, mollucs, insects and reptiles but these will not be affected since the area in question is outside of the development footprint, and will not be cleared. The conclusion of the team assessment was that the project will not negatively affect any faunal species of specific conservation concern.

Soil and Geology

According to the geotechnical study, the site is underlain by significant quantities of fill, relict colluvium and residual soils which are by Sandstones of the Natal Group. Alluvial occurs within the river channel.

The site is considered stable and suitable for the proposed development, provided the recommendations of the study are followed. The site itself has been modified over a period of time to create several cuts to fill platforms on which the existing buildings, mechanics and sand and brick yard are located. A retaining wall has been constructed to support the slope along Rawat Road.

Groundwater and Wetlands / Hydrology

The geotechnical study reported that no groundwater was encountered in any of the test pits excavated higher up on the site, although some slight groundwater seepage is likely to occur at the interface of soil horizons during the wet summer months or after periods of heavy rain.

There is a river flowing east of the site, however the proposed development will be away from the river with over a distance of 32 metres. Groundwater seepage was encountered on the site in the area adjacent to the river.

Wetland

The actual 5 349m² footprint to be developed has no wetlands, except the watercourse on the eastern side of the site.

Social attributes

The area is falling under eThekwini Metropolitan demarcated as ward 21 in terms of municipal boundaries.

Economic attributes

The proposed project is likely to create economic spin offs for the local people, especially the communities bordering the project site. The project is likely to make a major economic contribution in this regard, given the fact that it is surrounded by communities that need economic opportunities.

The Market Feasibility Assessment as well as the comments from the stakeholder meeting have confirmed the expected economic benefits that will flow from the project.

Heritage & archaeological, historical features and cultural aspects

Our walk about on site did not reveal any graves nor any visible heritage objects within the proposed project site. Nonetheless, Umlando Archaeological Surveys and Heritage Management has been engaged to assess the site based on the screening tool showing high archaeological and cultural heritage theme and paleontology theme. A review of the database and historical maps was interrogated by Umlando, which revealed that the area has no known heritage sites. The area is highly developed with no heritage sites and buildings.

Furthermore, no buildings were recorded on the 2000 topographical map, and thus the buildings post-date 2000. The PIA sensitivity map showed the area as of no significance. The area was therefore regarded as qualifying for exemption for further heritage mitigation.

In addition, the report has been forwarded to KwaZulu – Natal Amafa and Research Institute for their comments as custodians of heritage objects in the Province of KwaZulu – Natal.

Site photographs

Below is the site photograph showing the existing buildings - **Appendix C (1).**

Figure 2 - Building on site where the Service Station will be located

(v) The impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts –

(aa) can be reversed

(bb) may cause irreplaceable loss of resources; and

(cc) can be avoided, managed or mitigated

As highlighted this project has not considered any alternatives as per the reasons furnished above, as a result it will only consider the potential impacts for the preferred site. The only alternative is within the site itself.

Impacts identified for the preferred site

- Soil erosion during earthworks, construction and operational phases.
- Air pollution in the form of dust during construction.
- Soil contamination during construction.
- Underground and surface water pollution.
- Stockpiling.

- Location of construction camp.
- Littering and solid waste.
- Heritage objects and fossils.
- Concrete mixing.
- Alien plants - eradication that might invade the area after earthworks.
- Noise pollution during construction phase.
- Traffic Management.
- Health and Safety.
- Social and economic impacts.

Positive impacts of the activity

The Market Feasibility Assessment show that local unemployed people and small businesses will benefit in terms of jobs during the construction and operational phases of the project. The project will contribute in local economic development for the broader area. Local business will get an opportunity to be suppliers to the project, as well as sub-contracting opportunities.

Several skills will be required for the completed project like petrol attendants, security staff, cashiers, receptionists, housekeeping, chefs, waitress, gardeners, supervisors and so forth.

Negative impacts of the activity

The construction phase has to safeguard against any possible environmental degradation like soil erosion that may be caused during earthworks. The project has to safeguard against any possible underground water pollution, as well as surface water pollution.

Soil contamination due to concrete mixing and possible oil spillages. Air pollution in the form of dust during the construction phase that may be generated and dispersed to the neighbouring properties, road and passersby. Risk of fire and explosion due to the nature of the petroleum products stored on site.

Increase in ambient noise levels from construction machinery, workers on site and passers by and patrons. Emissions due to construction traffic as trucks deliver material on site, and the plant working on site. Waste that will be generated during construction and operational phases of the project. Health and safety risk to workers and residents during construction.

The EIA Regulations, 2014 as amended stipulates requirements that need to be adhered to and objectives to be reached when undertaking environmental impact assessment. Key to a successful EIA is the accurate identification of environmental and social impacts and the subsequent assessment of the likely significance of each impact. This will assist in facilitating the prioritization of impacts, the identification of fatal flaws and the identification of mitigation measures.

Table 3: interpretation of the overall significance of impacts is presented below

Scoring value	Significance
>35	High – **The impact is total / consuming / eliminating** – In the case of

	adverse impacts, there is no possible mitigation that could offset the impact, or mitigation is difficult, expensive, time-consuming or some combination of these. Social, cultural and economic activities of communities are disrupted to such an extent that these come to a halt. Mitigation may not be possible / practical. Consider a potentially fatal flow in the project.
25 – 35	High – **The impact is profound** – In the case of adverse impacts, there are few opportunities for mitigation that could offset the impact, or mitigation has a limited effect on the impact. Social, cultural and economic activities of communities are disrupted to such an extent that their operation is severely impeded. Mitigation may not be possible / practical. Consider a potential fatal flaw in the project.
20 - 25	Medium – **The impact is considerate / substantial** – The impact is of great importance. Failure to mitigate with the objective of reducing the impact to acceptable levels could render the entire project option or entire project proposal unacceptable. Mitigation is therefore essential.
7 - 20	**Medium - The impact is material / important to investigate** – The impact is of importance and is therefore considered to have a substantial impact. Mitigation is required to reduce the negative impacts and such impacts need to be evaluated carefully.
4 - 7	Low – **The impact is marginal / slight / minor** – The impact is of little importance, but may require limited mitigation; or it may be rendered acceptable in the light of proposed mitigation.
Scoring value	**Significance**
0 - 4	Low – **The impact is unimportant / inconsequential / indiscernible** – no mitigation required, or it may be rendered acceptable in light or proposed mitigation.

The significant rating of each identified impact was then reviewed by the EAP through professional judgement and checklists. The checklist entails comprehensive list of possible environmental effects and impacts. In assessing each impact and its significance the evaluation was based on the following elements:

Nature of the impact

The environmental impacts of a project are those resultant changes in environmental parameters, in space and time, compared with what would have happened had the project not been undertaken or if the no-go option was adopted.

Extent - This talk to the physical and spatial scale of the impact. Below are some of the standard terms used in assessment relating to the extent.

Table 4 - Extent

RATING	EXTENT SCALE
7	**International** - The impacted area extends beyond national boundaries.

6	**National** – The impacted area extends beyond provincial boundaries.
5	**Ecosystem** – The impact could affect areas essentially linked to the site in terms of significantly impacting ecosystem functioning.
4	**Regional** – The impact could affect the site including the neighbouring areas, transport routes and surrounding towns e.g. at the KZN Provincial level.
3	**Landscape** – The impact could affect all areas generally visible to the naked eye, as well as those areas essentially linked to the site in terms of ecosystem functioning.
2	**Local** – The impacted area extends slightly further than the actual physical disturbance footprint and could affect the whole, or a measurable portion of adjacent areas. Normally within a radius of 2 km from the site.
1	**Site Related** – This is an impact within the boundaries of the construction site or the development footprint. The loss is considered inconsequential in terms of the spatial context of the relevant environmental or social aspect.

Magnitude - This provides a qualitative assessment of the severity of a predicted impact. Below are some of the standard terms used in assessment relating to this indicator.

Table 5 - Magnitude

RATING	MAGNITUDE SCALE
7	**Total / eliminating** – Function or process of the affected environment is altered to the extent that it is permanently changed.
6	**Profound / considerate / substantial** – Function or process of the affected environment is altered to the extent where it is permanently modified to an extent of temporal cease.
5	**Material / important** – The affected environment is altered, but function and process continue, albeit in a modified way.
4	**Discernible / noticeable** – Function or process of the affected environment is altered to the extent where it is temporarily altered, be it in a positive or negative manner.
3	**Marginal / slight / minor** – The affected environment is altered, but natural function and process continue.
2	**Unimportant / inconsequential / indiscernible** – The impact temporarily alters the affected environment in such a way that the natural processes or functions are negligibly affected.
1	This is where there will be no impact on the environment.

Duration - This describes the timeline of the predicted impact. Below are some of the standard terms used in assessment relating to duration.

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Table 6 - Duration

Rating	DURATION SCALE
7	**Long term** – Permanent or more than 15 years post decommissioning. The impact remains beyond decommissioning and cannot be negated.

3	**Medium term** – Lifespan of the project. Reversible between 5 to 15 years post decommissioning.
1	**Short term** – The impacts will be easily reversible with the adoption of mitigation measures. This will happen during the project lifespan. The impact will either be remedied with mitigation or will be mitigated through natural processes within the project phase i.e. within 0 – 5 years.

Irreplaceability / Loss of resources - Environmental resources cannot always be replaced; once destroyed, some may be lost forever. It may be possible to replace, compensate or reconstruct a lost resource in some cases. The loss of a resource may become more serious later, and the assessment must take this into account. Below are some of the standard terms used in assessment relating to duration.

Table 7 - Irreplaceability / Loss of resources

RATING	IRREPLACEABILITY / RESOURCE LOSS SCALE
7	**Permanent** – The loss of a non-renewable / threatened resource which cannot be renewed / recovered with, or through, natural process in a time span of over 15 years, or by artificial means.
5	**Long term** – The loss of a non-renewable / threatened resource which cannot be renewed / recovered with, or through, natural process in a time span of over 15 years, but can be mitigated by other means.
4	**Loss of an 'at risk' resource** – one that is not deemed critical for biodiversity targets, planning goals, community welfare, agricultural production, or other criteria, but cumulative effects may render such loss as significant.
3	**Medium term** – The resource can be recovered within the lifespan of the project. The resource can be renewed / recovered with mitigation or will be mitigated through natural process in a span between 5 and 15 years.
2	**Loss of an 'expendable' resource** - one that is not deemed critical for biodiversity targets, planning goals, community welfare, agricultural production, or other criteria.
1	**Short-term** – Quickly recoverable. Less than the project lifespan. The resource can be renewed / recovered with mitigation or will be mitigated through natural process in a span shorter than any of the project phases, or in a time span of 0 to 5 years.

Reversibility - The distinction between reversible and irreversible impact is a very important one, and the irreversible impacts not susceptible to mitigation can constitute significant impacts in an EIA process. The potential for rehabilitation is the major determinant factor when considering the temporal scale of most predicted impacts. Below are some of the standard terms used in assessment relating to reversibility.

Table 8 - Reversibility

RATING	REVERSIBILITY SCALE

7	**Long term** – The impact will never be returned to its original or benchmark state. The impact cannot be reversed.
3	**Medium term** – The impact / effect will be returned to its original or benchmark state through mitigation or natural processes in a span shorter than the lifetime of the project, or in a time span between 5 and 15 years.
1	**Short term** – The impact / effect will be returned to its original or benchmark state through mitigation or natural processes in a span shorter than any of the phases of the project, or in a time span of 0 to 5 years.

Probability - The assessment of the probability / likelihood of an impact / effect has been undertaken in accordance with ratings and descriptors provided below.

Table 9 - Probability

RATING	PROBABILITY SCALE
1.0	Absolute certainty / will occur
0.9	Never certainty / very high probability
0.7 – 0.8	High probability / to be expected
0.4 – 0.6	Medium probability / strongly anticipated
0.3	Low probability / anticipated
0.2	Possibility
0.0 – 0.1	Remote possibility / unlikely

(vi) The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives

There are no alternative sites, as a result the assessment focused on this specific site (preferred site). The site visit, and site walk while analyzing and observing the physical environment on the project site. Desktop analysis of the site using google image, map analysis like National Wetlands map & aerial images, SAHRIS heritage programme and South African Protected Conservation Areas Database (SAPAD). We also used professional judgment, observation on site and past experience.

We have consulted stakeholders and tapped on their knowledge. We have also looked at the historical data for the site, to get a better insight of the changes over time. We have also studied literature and Specialists studies relating to this site.

(vii) Positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects

Positive impacts of the activity

The local unemployed people and small businesses will also benefit in terms of jobs during the construction and operational phases of the project. The local economic development for the greater area will be enhanced by this project. Suppliers and sub-contractors will benefit during the construction phase, as well as during the operational phase. The project will contribute in skills development for the area in that the locals will get an opportunity in new skills like petrol attendants, cashiers, waitress and so forth.

Negative impacts of the activity

The construction and operational phases have to safeguard against any possible environmental degradation like soil erosion that may be caused by the development footprint. The project has to safeguard against any possible pollution of both surface and underground water. The project has to safeguard against soil contamination by machinery during earthworks and construction phase. The project of this nature poses a risk of fire and explosion due to the nature of the petroleum products stored on site, albeit the strict regulations guiding such storage on site.

Overall, the project is alive to the concept of sustainable development that talks to development that meets the needs of the present without compromising the ability of future generations to meet their own needs. The concept continuously underpins the inextricable link between human socio-economic systems and the environment. Therefore, the project has no intention of socially harming the area, if anything it will promote its growth and prosperity.

(viii) The possible mitigation measures that could be applied and level of residual risk

Mitigation - In the assessment process the potential to mitigate the negative impacts is determined and rated for each identified impact. The significance of environmental impacts has therefore been assessed considering any proposed mitigation measures.

- Reduction of soil erosion by ensuring that the soil has ground cover at all times.
- Ensuring that noise levels are within legally acceptable levels during the construction phase.
- Landscaping after project completion that may include indigenous plants as part of promoting the natural feel, as well as habitats for the fauna.
- Ensuring that there is no degradation taking place on site during construction and post construction, achieved through continuous monitoring by the Environmental Control Officer.
- Ensuring that waste is disposed in line with acceptable environmental standards.
- Stormwater management need to be implemented as per the recommendations of the Stormwater plan.
- Implementation of the Environmental Management Programme (EMPr) and its recommendations.
- Safeguard against pollution of water resources.
- The use of fuel tanks that comply with SABS standards and relevant SANS.

- Ensuring that the project stick to the principles of sustainable development, and look at all aspects in a balanced manner.

(ix) The outcome of the site selection matrix

There has been no comparison of sites, as the preferred site is the only site assessed. Therefore, there has not been any site selection matrix applied.

(x) If no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such

There has been no alternative site assessed as highlighted above, however the project is located along the Posselt Road which is an ideal spot form the connectivity perspective, compared to the back side of the property.

The preferred site can be motivated as follows:

- The site has been bought by the proponent for this specific activity due to its ideal location from the business perspective as per the requirements of the petroleum industry, among other things that look at accessibility, visibility, environmental sustainability and size.
- The site is transformed and has existing buildings that will be demolished.
- The assessment has not shown any fatal environmental flaws.
- The site is located in an area with established engineering services and infrastructure, therefore there will be no need to disturb another site with new infrastructure development.
- According to the socio – economic study the business is economically viable, and likely to do well in the current location.
- There are no households and settlement that will be disrupted by the construction of this project.
- The location of the site adjacent to Clermont township present an opportunity for the project to made a meaningful impact and contribution to the social prosperity and growth.

(xi) A concluding statement indicating the preferred alternatives, including preferred location of the activity

It is deemed practical to continue with this site as opposed to abandoning it for another site. The choosing of any new site will mean abandoning this site and buying another one elsewhere which may not be economically feasible. The service station as a land use may not necessarily be a free entry on any other site, compared to this one.

(l) A FULL DESCRIPTION OF THE PROCESS UNDERTAKEN TO IDENTIFY, ASSESS AND RANK THE IMPACTS THE ACTVITY WILL IMPOSE ON THE PREFERED LOCATION THROUGH THE LIFE OF THE ACTIVTY, INCLUDING –

The environmental team visited the site on several occasions i.e. on 28 October 2019 to see the site, and again on 27 January 2020, 25 February 2020 and 24 June 2020.

Desktop analysis of the site was done using google images, map analysis like National Wetlands map & aerial images, SAHRIS heritage programme and South African Protected Conservation Areas Database (SAPAD). We also used professional judgment, observation on site and past experience. The stakeholders were consulted widely, including the locals to tapper on their knowledge of the area, and site in particular.

We did literature review of the area, and also used the knowledge of specialists as per the Specialists Studies conducted.

(i) A description of all environmental issues and risks that were identified during the environmental impact assessment process

- Soil erosion during earthworks, construction and operational phases.
- Air pollution in the form of dust during construction.
- Soil contamination during construction.
- Underground and surface water pollution.
- Stockpiling on site.
- Location of construction camp.
- Littering and solid waste.
- Heritage objects and fossils.
- Concrete mixing.
- Alien plants.
- Noise pollution during construction phase.
- Traffic Management.
- Health and Safety.

(ii) An assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures

- Air pollution in the form of dust during construction.
- Soil contamination during construction.
- Underground and surface water pollution.
- Stockpiling.
- Location of construction camp.
- Littering and solid waste.
- Heritage objects and fossils.
- Concrete mixing.
- Alien plants - eradication programme.
- Noise pollution during construction phase.
- Traffic Management.
- Health and Safety.
- Social and economic impacts (positive and negative).

Table 10 – Impacts and mitigation

Impact and risk	Description / Significance	Mitigation
Soil erosion / earthworks	• The removal of groundcover and earthworks may lead to soil erosion on site.	• Any noticeable erosion gullies on site must be dealt with, by implementing anti-erosion measures. • Reuse topsoil to rehabilitate disturbed areas. • Prevent soil erosion by maintaining the grass cover on site. • Stormwater plan will control all stormwater which may cause soil erosion on site.
Air pollution	• Dust from earthworks. • Construction vehicle fumes.	• Suppression of dust by watering the project site as and when necessary during construction. • Vehicles and machinery must be properly and regularly serviced.
Soil contamination	• Concrete mixing must not spill onto the soil during construction. • Oil and chemicals contaminating soil during construction.	• Prevent soil contamination by not mixing any concrete on the soil. • Vehicles and plant must not be allowed to drip oil, and drip trays must be used when vehicles/plant are parked on site. • Vehicles must not be repaired on site as to cause soil contamination.
Stormwater and water resources	• Contamination of ground and surface water. • Accidental spillages of Petro chemicals from vehicles and equipment. • Erosion gullies. • The tanks pose a risk of leak onto to the underground water resources.	• Compilation of the Stormwater Plan. • The Plan has to be implemented to the letter, ensuring that accumulated surface water is collected and disposed of in a responsible manner. • Before and after construction the site must be graded, and no ponding of water on site must be allowed.

		• The platform must be graded to prevent ponding and ingress of water into the newly placed fills and the deeper soils. • Rainwater harvesting must be adopted on site. • The tanks must be SABS compliant and in line with relevant SANS. • The base of the fuel tank excavations must be flat and free of rocks, compacted to specification with the correct backfill material and prepared using accepted SANS standards to ensure stability of underground tanks. • All pipe-work must be double walled and comply with SANS 62- 1 and 2'SANS 1132 (pipework). • Absorbent spill kits and disposal containers must be provided to workers to handle spillages. • The underground storage tanks must be designed and installed in accordance with the SABS Standards (South African Bureau of Standards, SABS 089-3-1999'and Third Edition. Code of practice – The petroleum industry, Part 3: The installation of underground storage tanks, pumps/dispensers and pipework at service station and consumer installations). SANS standards adequately

		address various potential impacts via the implementation of required engineering measures. • An emergency preparedness and Response Plan must be implemented for the site.
Stockpiling	• Stockpiling will be done on site, within a clearly demarcated construction camp.	• No stockpiling must take place within 150 metres of a watercourse.
Location of construction camp	• A construction camp will be located at the appropriate place, and accordingly fenced.	• The construction camp must be located 150 metres away from the watercourse.
Destruction and disturbance of graves and heritage resources.	• The project will have to be on the watch for any heritage objects that may be found during earthworks phase.	• The Heritage assessment has not identified any heritage objects on site. In case of any heritage object found during earthworks, the project must stop, and such must be reported to Amafa.
Littering / Solid waste / Waste	• The project must take care of the site not to be polluted by such things as litter by workers on site, oil spills, building material, papers, cans and bottles. • Possible waste – plastics, metal, wood, concrete and so forth.	• Solid waste must be disposed of at the nearest landfill site, with proof of responsible disposal method whenever requested. In all likelihood the bulk of solid waste generated will be in the category of general waste. • However, it is anticipated that some hazardous waste may be generated which will be disposed of appropriately in the landfill site that accepts such type of waste. Hazardous waste defined as waste that poses substantial or potential threat to public health and the environment. This includes waste that tends to ignite, reactive, corrosive and toxic. • Chemical waste must be stored in appropriate containers and disposed of at an appropriate

		disposal site. • Rubbish drums and refuse plastic bags will have to be made available for litter during the day, to be cleared and disposed of at the municipal disposal site at appropriate intervals as advised by the Environmental Control Officer. • All construction spoil must be disposed of at the municipal landfill site. • No burning of refuse must take place on site.
Alien invaders	• Alien plants invading the site must be eradicated systematically.	• Alien plants will be eradicated on project completion.
Concrete mixing	• Concrete mixing on site can pollute and contaminate the soil.	• The mixing of concrete must be done within the bunded area or alternatively be brought on site by a readymade concrete mixer. • All spillages must be removed and properly disposed of.
Noise (construction phase)	• There will be ambient noise on site due to construction activities, especially vehicles and machinery.	• Machinery and equipment used during construction phase must be properly serviced. • No construction must take place during the night as to disturb the peace of the area. • No construction must take place during Sundays and public holidays.
Traffic management	• There will be an increase of traffic flow in the vicinity of the site during construction.	• The recommendations of eThekwini Municipality and the TIA will have to be implemented to the letter. • Flag persons will be used to control traffic as may be necessary. • The 40 km speed signs will be erected on site, in order to control traffic speed and avoid accidents.
Health and Safety	• The movement of people within the site must be	• Safety officer must be appointed to deal with all safety

	controlled through the security entry and register. • The site will have a dedicated Safety Officer. • Construction vehicles must not pose a threat to the safety of local pedestrians • The workers must be provided with mobile toilets on site. • Fire and explosion always pose danger to projects of this nature.	issues on daily basis during construction. • Safety induction must be done on commencement of construction. • Protective clothing must be worn by workers at all times. • Safety file and Safety officer to be on site, especially during construction phase. • Safety signs and speed limits erected on site. • The mobile toilets on site must be kept clean and serviced regularly. • Fire extinguishers must be readily available onsite and easily accessible. • Firefighting equipment must comply with SANS 1151 and must be inspected regularly. • No smoking must be allowed near flammable materials. • No cell phones may be used during fuel dispensing during operational stage. • An emergency Response Plan (ERP) must be implemented for the site, for emergency procedures. The ERP must include emergency contact numbers. • Staff must be trained adequately to avoid and handle high risk situations.
Socio – economic impacts	• Creation of employment opportunities for skilled and non-skilled employees. • Skills development to local communities.	• Prioritisation of the locals in terms of employment, unless if the skill is not available locally. • Complaint register must be accessible on site to

	• Possible opportunities for the local suppliers and sub-contractors.	the members of the public. • The project will ensure it encompasses the concept of sustainable development. • The project must ensure the success of its commitment to social upliftment.
Economic impacts	• The proposed development will provide permanent employment opportunities to some members of the community.	• The developer has stated the project's commitment to social upliftment and creation of opportunities.

Cumulative impacts affect the significance ranking of an impact since it considers impacts from both on and off site. The challenge is when the impacts that are considered within standards if combined may be cumulative in nature to the level that may exceed the set standards. In this regard it is important to consider impacts in terms of their cumulative nature.

Table 11 – Cumulative impacts

Impact and risk	**Cumulative impacts (past, current and foreseeable)**
Soil erosion	Not cumulative.
Air pollution	None anticipated.
Soil contamination	None anticipated.
Stormwater and water resources	Not foreseen, with a stormwater plan in place.
Stockpiling	None anticipated.
Location of construction camp	Not foreseen
Destruction and disturbance of graves and heritage resources	Not foreseen
Littering and solid waste	Unlikely to be cumulative
Concrete mixing	Not cumulative in this instance
Noise (construction phase)	Not cumulative
Traffic management	Not cumulative - The TIA report concluded that the existing traffic conditions are good, with all critical intersections operating at good levels of service during peak hours.
Health and Safety (construction phase)	Not cumulative
Health and Safety (operational phase)	Not cumulative

Socio – economic impacts (negative)	Not cumulative

(J) AN ASSESSMENT OF EACH IDENTIFIED POTENTIALLY SIGNIFICANT IMPACT AND RISK, INCLUDING –

- Cumulative impacts that may occur as a result of the undertaking of the listed activity during the project life cycle;
- The nature, significance and consequence of the impact and risk;
- The extent and duration of the impact and risk;
- The probability of the impact and risk occurring;
- The degree to which the impact and risk can be reversed;
- The degree to which the impact and risk may cause irreplaceable loss of resources; and
- The degree to which the impact can be mitigated.

Table 12: Assessment of negative impacts of the preferred site and layout

Impact and risk	Magnitude	Duration	Extent	Reversibility	Irreplaceability/ Loss of resources	Probability	Significance with mitigation
Soil erosion	Unimportant.	Short term.	The loss is considered inconsequential	Medium - term	Short - term.	Probable.	See Table 13 below
Air pollution	Unimportant	Short term	Considered inconsequential.	Short term	Short-term	Probable	See Table 13 below
Soil contamination	Unimportant.	Short term	Considered inconsequential.	Short term	Short-term	Probable	See Table 13 below
Stormwater and water resources	Unimportant	Short term	Extends slightly further than site	Short term	Medium term	Probable	See Table 13 below
Alien invader species	Important	Short term	Considered inconsequential.	Short term	Short term	Probable	See Table 13 below
Stockpiling	Unimportant	Short term	Considered inconsequential	Short term	Short term	Remote possibility	See Table 13 below
Location of construction camp	Unimportant	Short term	Considered inconsequential	Short term	Short term	Remote possibility	See Table 13 below
Destruction and disturbance of graves and	Unimportant	Short term	Considered inconsequential	Short term	Short term	Remote possibility	See Table 13 below

heritage resources							
Littering and solid waste	Unimportant	Short term	Considered inconsequential	Short term	Short term	Low probability	See Table 13 below
Concrete mixing	Unimportant	Short term	Considered inconsequential	Short term	Short term	Low probability	See Table 13 below
Noise (construction phase)	Unimportant	Short term	Considered inconsequential	Short term	Short term	Probable	See Table 13 below
Traffic management	Marginal	Short term	Noticeable	Short term to Medium term	Short term to Medium term	Probable	See Table 13 below
Health and Safety (construction phase)	Inconsequential	Short term	Considered inconsequential	Short term	Medium term	Probable	See Table 13 below
Health and Safety (operational phase)	Noticeable	Short term	Extends slightly further than site	Short term	Medium term	Remote possibility	See Table 13 below
Socio – economic (negative)	Inconsequential	Not foreseen	Not foreseen	Not foreseen	Not foreseen	Unlikely	See Table 13 below

The overall significance of an impact / effect has been ascertained by attributing numerical ratings to each identified impact. The numerical scores obtained for each identified impact have been multiplied by the probability of the impact occurring before and after mitigation. High values suggest that a predicted impact / effect is more significant, whilst low values suggest that a predicted impact / effect is less significant.

Table 13: Ranking and scoring of negative impacts of the preferred site and layout

Impact and risk	**Magnitude**		**Duration**		**Extent**		**Resource Loss**	**Reversibility**		**Probability**		**Significance Without mitigation**	**Significance with mitigation**
Soil erosion	Without	With	Without	With	Without	With		Without	With	Without	With		
	3	**2**	**3**	**2**	**2**	**1**	**0**	**3**	**1**	**0.3**	**0.2**	**3.3**	**1.2**

Air pollution (dust)	3	2	3	1	2	1	1	3	1	0.6	0.2	7.2	1.2
Soil contamination	3	2	3	1	2	1	1	3	1	0.3	0.2	3.6	1.2
Water resources pollution	2	1	3	1	2	1	0	3	1	0.3	0.2	3	0.8
Alien invader species	2	1	3	1	2	1	0	3	1	0.3	0.2	3	0.8
Stock piling	2	1	3	1	2	1	3	3	1	0.2	0.1	2.6	0.7
Location of construction camp.	2	1	3	1	2	1	3	3	1	0.6	0.1	7.8	0.7
Heritage resources	2	1	1	1	2	1	1	3	1	0.2	0.1	2	0.6
Solid waste	3	2	3	1	2	1	1	3	1	0.6	0.3	7.2	1.8
Concrete	3	2	3	1	2	1	1	3	1	0.6	0.3	7.2	1.8
Noise - construction phase	3	2	2	1	2	1	1	1	1	0.4	0.2	3.6	1.2
Traffic	4	3	3	1	3	2	1	7	3	1.0	0.9	18	9
Health and	4	2	3	1	3	1	3	3	1	0.4	0.2	6.4	1.6

Safety (construction)													
Health and Safety (operational)	**5**	**4**	**3**	**2**	**3**	**2**	**3**	**3**	**1**	**0.2**	**0.1**	**3.4**	**1.2**
Socio – economic impact (negative)	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0.0**	**0.0**	**0**	**0**
Average												**5.22**	**1.6**
												Low	**Low**

Significance

In the context and highlight of the significance scoring outlined above, the Service Station impacts can be mitigated. The overall significance impact for both options without mitigation, is considered to be LOW, with a score of 5.22. When mitigation is taken into consideration, the overall impact significance is still considered to be LOW, with a score of 1.6.

It has to be noted that the low impact is in line with the low risk relating to the watercourse provided by Nature Stamp in their report attached as **Appendix D (6).**

There are no alternative sites that have been analysed, and therefore there is no way of comparing the impacts for alternatives. However, our assessment is that the economic benefits to the community far outweighs the impacts that can be mitigated like underground water resources, soil erosion and so forth. This benefit talks to the jobs, a place to re fuel and buy small items from the convenience shop and the food outlet for the patrons. This is likely to have a direct bearing on the wellbeing of the local residents. The no-go option will offer very little benefit to the locals and broader economy when one considers the findings of the Market Feasibility Study.

Accordingly, it is the opinion of the EAP that there is no significant reason why the project cannot be authorized compared to the no-go option.

(K) WHERE APPLICABLE, A SUMMARY OF THE FINDINGS AND IMPACT MANAGEMENT MEASURES IDENTIFIED IN ANY SPECIALSITS REPORT COMPLYING WITH APPENDIX 6 TO THESE REGULATIONS AND AN INDICATION AS TO HOW THESE FINDINGS AND RECOMMENDATIONS HAVE BEEN INCLUDED IN THE FINAL REPORT;

THE FOLLOWING SPECIALISTS STUDIES ARE ATTACHED AS APPENDICES D:

Based on the screening tools and interaction with the Competent Authority during the pre – application meeting, the following studies have been conducted on site: i.e.:

- Market Feasibility Assessment / Socio economic study.
- Geotechnical Study
- Traffic Impact Assessment (TIA)
- Heritage Assessment
- Hydrological Study and Stormwater Plan Management.
- Watercourse Assessment.

The EAP also conducted a basic vegetation assessment for completeness, although the vegetation is outside of the proposed development footprint, which will be where the current buildings are located.

Market Feasibility Study for the proposed Mageza Service Station and Food outlet Drive Thru (New Germany) prepared by Urban – Econ dated February 2020 – Appendix D (1)

The study is set to determine the market potential of the proposed Sasol Mageza Service Station and the food outlet drive-thru establishment, located on Posselt Road, ERF 92, New Germany.

In this regard there are certain major socio-economic factors that must be accounted for. These include, but not limited to, the following:

- o Site Assessment
- o Target Market Profile
- o Competition Analysis
- o Competing Filling Stations Impact
- o Socio-Economic Impacts Analysis

The analysis of these factors and dynamics tend to determine whether or not the proposed Sasol Mageza Service Station and the complementary drive-thru establishment will make business sense.

Qualitative interviews were conducted with motorists, residents, businesses, and community leaders (i.e. Ward Councillors: 19,20,21) around the vicinity of the proposed development.

The traffic count done by the traffic engineer indicates that a substantial number of vehicles do pass the location of the proposed site for Sasol Mageza Service Station. This implies that large number of vehicles may be intercepted by the service station and thus sustain the business in return.

The key spatial factors considered included accessibility, quality of roads and visibility among other factors. These affirm that the location of the proposed filling station is conducive for the growth and sustainability of the development.

The primary and secondary market for Sasol Mageza Service Station and drive-thru outlet is located within

four (4) kilometres of the proposed service station and comprise a population of 128 252 people from the five (5) market areas: New Germany, Clermont, KwaDabeka, The Wolds and Berkshire Downs.

19% of the households in the market catchment area do own a car. These households along with the transient market will form the basis of the market for Sasol Mageza Service Station. In the region of 43% of the market catchment population is employed while a staggering 57% is unemployed or not economically active or are discouraged work seekers. A high 34% of the market catchment area either have no income or live on less than R30 a day.

This marks the poorest of the poor in the study area population. Since these people are practically not economically active. Sasol Mageza Service Station and Drive Thru will play an important role in ensuring that some of these people are brought back into the economic mainstream.

The fuel demand calculation at 6% interception rate indicate that there is market demand of 320 904 litres a month for the prosed filling station. Moreover, there is a market demand for a convenience store that is 254 m² GLA in size.

According to the report, the capital expenditure phase will create a total of 214 jobs per annum.

Since 21% of the market catchment population earns R38 4001 and above, it follows that they will be able to support the filling station as well as its ancillary services such as the convenience store and the drive-thru establishment.

Sasol Mageza Service Station will play a meaningful role in ensuring that strategic goals of the KZN PGDS are realised i.e. inclusive economic growth, spatial equity etc.

There are several filling stations that are located in the areas surrounding Posselt Road and New Germany, the location of Sasol Mageza Service Station. Although there may be several filling stations in the vicinity of the proposed service station on Posselt Road, none bears the name brand “Sasol” and none is located on the feeding road of Posselt Road West heading straight. This implies that Sasol Mageza Service Station will be supplying the market that is slightly different to the other filling stations in the area.

A total of 15 filling station owners and managers were telephonically interviewed on Wednesday 12 February 2020. The main question asked the respondents was whether the proposed filling station on Posselt Road will have a negative impact on their sales. In the main, filling stations located within 3 km of the proposed site indicated that the proposed filling station will have a negative impact on their sales. On the other hand, those filling stations located over 4 km away were generally of the view that the proposed filling station will not necessarily have an impact on them. Although most filling stations were reluctant to reveal the number of litres, they pump each month, those that shared ranged between 300 000 – 450 000 litres a month.

Regarding competition economic impact, this study found that the competing filling station will be negatively impacted by the proposed new filling station for only two (2) years (2020 – 2022). Between 2024 and 2025 the competing filling stations will breakeven and start making profit once more. Therefore, the co-existence of Sasol Mageza Service Station and the competition is not in doubt as all could be sustainable in the long term. Therefore, it is the conclusion of this study that the impact on competing filling stations will be temporary while profitability will be maintained for the coming years.

Table 13 of the report indicates that there are five (5) filling stations located within 2 km of the proposed Sasol Mageza Service Station i.e. Transport Park Fuel Stop and Roadhouse, Drivin’ Diesel, Total

Clermont Service Station, Engen Mine Own Convenience Centre and Shepstone Road Motors. These service stations do have convenience stores and offer complementary services such as car wash, ATM and fast food. These filling stations can be classified as some competition to the proposed service station on Posselt Road. However, none of the stations is located on Posselt Road, which is the road directly feeding the proposed development on ERF 92.

Within 5 km radius of the proposed service station on Posselt Road there is a total of 16 filling stations. Most of these filling stations also offer a convenience store and a myriad of other services such as a coffee shop, fast food, car wash and ATM and they also operate 24 hours. These filling stations are an indirect competition to the Sasol Mageza Service Station given their locations that is furthest away from the proposed development. By inference, Sasol Mageza Service Station will be supplying the market that is slightly different to those serviced by these filling stations. This was confirmed during interviews with filling stations owners and managers, located 4 km and above from ERF 92, who indicated that they will unlikely be negatively impacted by the proposed filling station given their furthest away from the development.

The interception rate refers to the percentage of the total commuter traffic that pass or turns into the proposed filling station. For the purpose of this current study, the interception rate is estimated at 6% primarily of total commuter traffic that approach from the west of Posselt Road and those linking with the feeding road from respective intersections around the site.

Interception rate factors being – accessibility, convenience, location, order of road, other filling stations, passer by traffic, service to the public, site layout, visibility. These interception rate factors indicate that the proposed Sasol Mageza Service Station site is well located along a high mobility corridor and will thus provide convenience to motorists travelling along Posselt Road to either the Clermont Township or to Pinetown and beyond.

This section has highlighted that although there are no filling stations directly on Posselt Road mobility corridor, there are several filling stations around the proposed site and in the rest of the New Germany area. This means there is direct competition to the proposed Sasol Mageza Service Station development. However, the finding implies that the proposed petrol filling station and its ancillary forecourt store stand a good potential to achieve the required monthly sales to remain sustainable and competitive. The same can be said for the competition, that although they will be impacted initially, the impact will reduce over time and eventually diminish. Therefore, the competition itself will remain sustainable on their locations.

Therefore, these potential market demand numbers conclusively indicate that the proposed Sasol Mageza Service Station and its supporting convenience store is market feasible.

Drive-thru customers are not the same as those on foot. Mall stores do better business over lunch while drive-thrus get busy in the evening as people head home and pick up dinner along the way.

Drive-thru outlets are traditionally labour intensive. So, for them to be able to provide an efficient service to its customers it must have a substantial number of staff. This will create a substantial number of employment opportunities for the locals. However, it is this large overheads costs that affect profit margins for drive-thru establishments.

Residents from New Germany and other surrounding areas that are situated within close proximity of the proposed development i.e. KwaDabeka, Berkshire Downs and Clermont, will be able to make these purchases of convenience goods from the proposed development. In addition, the development of the proposed filling station would create employment during its construction and operation phases. Moreover, similar businesses close by may have their profit margins reduced on account of a new business

emerging.

There will be a total of about 40 people gaining permanent employment at both Sasol Mageza Service Station and a drive-thru outlet.

Geotechnical Study prepared by GoeZone Services dated February 2020 – Appendix D (2)

As highlighted above, the site is considered stable and suitable for the proposed development, provided the recommendations of the study are followed. The site itself has been modified over a period of time to create several cuts to fill platforms on which the existing buildings, mechanics and sand and brick yard are located.

The report has emphasized that for the stable site, the important thing will be the control and removal of surface water, and the design of the stormwater management system must allow the drainage of accumulated surface water from the hard stand area to existing drainage lines ensuring that the river on the eastern side is not contaminated.

The report has also specified and recommended the depths at which the structures be founded. In the same vein the report has directed that the foundation pressure of 100 kN / m² may be used for the strip footings.

The ground conditions described in the geotechnical report refer to those encountered during the testing on site. The report has further emphasized that the construction phase of the project be treated as the augmentation of the geotechnical investigation conducted on site.

Traffic Impact Assessment (TIA) for a proposed Mageza Service Station (New Germany) and food outlet located at Posselt at New Germany, eThekwini Municipality prepared by Bala Survey dated 15 April 2020 - Appendix D (3)

The site is currently having several access points off Posselt road, which is a municipal 11m wide two-way carriageway class 4 road. However, all the informal access points will be consolidated into one formalized access off Posselt road. The later has a speed limit of 50 km/h, with a public transport layby adjacent to the proposed development.

According to the TIA the shoulder sight distance for 50 km/h road for a truck and trailer in a worst-case scenario is 170m, and this is achievable from the site access on Posselt road as long as there are obstructions to the view in the site triangle in either direction of the access point. Therefore, site distance conditions along the roads in the vicinity of the proposed development is regarded as acceptable. There are sidewalks on both sides of Posselt road, and these will need upgrading as directed by the TIA.

The proposed development is expected to generate mostly vehicular traffic with less public transport passengers and pedestrians. Adequate parking bays have been provided on site.

The TIA analysis of the traffic count revealed that the weekday AM peak on this road network occurred from 6.45 to 7.45, and the weekday PM peak from 16.45 to 17.45 both of which are typical peak commuter periods for a weekday commuter morning and afternoon in an urban area.

The TIA further analyzed the intersection as to quantify the performance of an intersection with regard to traffic volumes and environmental conditions, measured in terms of Level of Service (LOS). In all instances the analysis has shown that the intersection operates at an acceptable level of service during both the AM and PM peak hours.

The TIA report has therefore concluded that the existing traffic conditions are good, with all critical

intersections operating at good levels of service during peak hours. The design year horizon analyzed traffic for a 5-year horizon. The results indicated that none of the intersections analyzed needed upgrades to accommodate traffic volumes.

The TIA concluded by supporting the proposed Service Station with drive thru food outlet development from the traffic perspective, as long as all the recommendations are implemented to the letter.

Heritage Assessment by Umlando dated 2012 - Appendix D (4)

As indicated above Umlando Archaeological Surveys and Heritage Management has been appointed for this project to assess archaeological / cultural heritage, paleontology theme and age of buildings on site.

As indicated in their report attached as Appendix D (4), the site review of the database and historical maps revealed that the area has no known heritage sites. The area is highly developed with no heritage sites and buildings. No buildings were recorded on the 2000 topographical map, and thus the buildings post-date 2000. The PIA sensitivity map showed the area as of no significance.

The draft Basic Assessment report has however been sent to KwaZulu – Natal Amafa and Research Institute for their formal comments as custodians of heritage objects in the Province of KwaZulu – Natal.

Draft Hydrological Assessment & Stormwater Management Plan prepared by Nature Stamp dated August 2020 - Appendix D (5)

As much as the focus of the environmental assessment is the Service Station and the food outlet drive thru, but this specific assessment has been conducted for the whole site, as the hydrology affects the whole site.

The proposed site is located on a small catchment area that has been mainly modified by residential, commercial, light industry and industry. The river system is not recognized as a National Freshwater Ecosystem Priority Areas (NFEPA) system nor are there NFEPA wetlands in or around the site. The watercourse systems adjacent to the site have been heavily invaded by invasive alien plants and have informal housing located within the banks of the river.

Rainfall in the region occurs in the summer months (mostly December to February), with a mean annual precipitation of 922 mm. The 1:100-year flood event has already been modelled for the site. Through discussions with the Department of Water and Sanitation (DWS), it was determined that this spatial data was sufficient to use for the site.

The flood analysis undertaken for eThekwini Metropolitan by SRK was used for this assessment. Most of the development area is outside of the flood extent. However, some of the parking area for the drive thru of phase 1 and the hardware yard in phase 2 is within the 100-year flood extent. However, this does not consider the proposed terracing and subsequent raised platform associated with the development. It is likely that the flood extent would not exceed the raised platform but would exceed the hardware yard of phase 2.

As per eThekwini's focus on Sustainable Urban Drainage Principles (SuDS), the stormwater should be managed close to the source through green sustainable means. In order to address these needs, the following recommendations should be adopted:

- The use grass block or alternative semi-permeable paving for parking areas. This is highly recommended for areas adjacent to the watercourse;
- The use of vegetated retaining walls on the steep terraces;
- The use of storage tanks at the outlet of each drain to meet the storage requirements;
- The use of the stored water to maintain the vegetation on-site; and

- The installation of dissipation structures at the flow outlets.

There are no dams downstream of the site and due to the poor water quality, limited abstraction occurs. The mitigation measures proposed must be followed to the letter, in order to mitigate potential impacts. Monitoring and follow up assessments are essential to maintaining the overall health and continued management of the watercourse system. Focus should be placed on maintaining the integrity of the watercourse, the impact the development may have on the PES and EIS as well as the SWMP.

Watercourse Assessment prepared by Nature Stamp dated August 2020 - Appendix D (6)

The report has delineated the wetlands / riparian area to show no go areas, in order to establish the connectivity of the systems and potential impacts from the proposed development.

The site as observed through a series of historical images has shown that it is heavily invaded by alien plant species with water quality highly compromised. The loss of natural habitat, biota and basic ecosystem functions are extensive. The dumpsite and recycling programme is noticed on the northern tip of the property. Additional buildings were added on the western side of the property around 2013, with a platform constructed on the south eastern side in the last two years. The surrounding areas are largely transformed with numerous road crossings, industrial sites, informal recycling, illegal dumps, and residential/informal encroachment.

The flood plain wetland on-site has been severely encroached and modified. The assessment could not establish any variation in soil form, terrain and the vegetation surrounding the wetlands. The present hydrological state of the wetland was given a score of D, meaning that impact of the modifications is detrimental to hydrological integrity.

The report makes a point that key factors influencing hydrological impacts on the wetland is the encroachment by humans/industry and high-water using vegetation in the wetland catchment. These are streamflow reduction activities that are decreasing water flow into the system. Natural water distribution and retention patterns are altered as a result of impeding structures across the wetlands, such as the roads and paths and infilling that have resulted in hardened surfaces and therefore greater runoff as the surface roughness is altered.

It is important to note, that while the wetland scores relatively low for hydrology, there are also severe localized impacts in the vicinity of the site which are not adequately reflected when combined with the state of the total wetland.

The report has accorded the site a low risk value, with proposed mitigation factors.

(I) AN ENVIRONEMNTAL STATEMENT WHICH CONTAINS -

(i) *a summary of the key findings of the environmental impact assessment;*

It is critical that all project phases adhere to the conditions stated in this draft Basic Assessment Report report, specialists' studies and the EMPr for the proposed project. In this regard, it is anticipated that the project will not have a significant impact on the receiving environment.

The main positive impact relates to jobs that will be created by the project benefitting residents closer to where they live. The project is therefore likely to also benefit the motorists travelling along

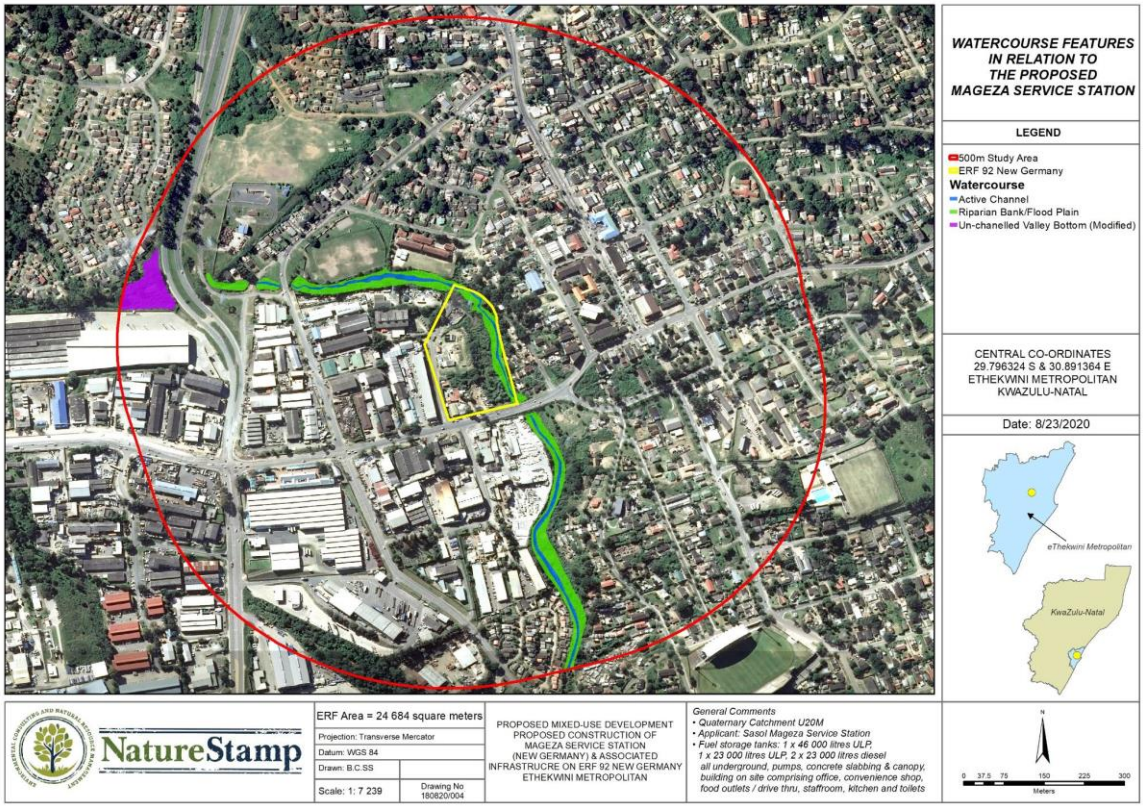
Possselt road in the form of fuel and take away. The commitment shown by the developer to the upliftment of the local people. In this regard it is anticipated that the project will have a greater social impact in the area.

However, on the other hand it must be ensured that the project does not affect any of the resources like underground resources. The project must ensure there is no soil erosion taking place on site which may result on siltation to the adjacent watercourses. The post construction landscaping must ensure that indigenous tree species and ground cover is maintained on site. All material used during construction will have to be removed from site to the disposal site, so that the environment is left in a good state. The alien plants must be eradicated on site. The project has to consider the concept of sustainable development.

In the broader scheme of things, the impacts anticipated in the project site are of low impact as highlighted by the significance ranking above. These can be mitigated as outlined above, and also emphasized in the EMPr.

In the final analysis, social, economic and environmental factors must be weighed against the mitigatory measures advanced by the actual assessment and other reports where applicable and takes everything together for a balanced and well thought decision. Overall, the identified impacts can be mitigated as long as the recommendations of the Specialists studies and Environmental Management Programme is followed to the letter. Therefore, the EA if granted, and the EMPr will be very crucial during all phases of the project. The EMPr will guide all environment related issues during all phases of the project from planning, pre-construction, construction and operational phase.

(ii) ***a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and***



(Source: Watercourse Assessment, dated August 2020 prepared by Nature Stamp).

(iii) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives;

Positive implications of the activity

The positive spinoffs relate to job creation and business opportunities for the local businesses during construction. The project will also provide fuel, food and other items closer to where people are living.

Negative implications of the activity

The project has to safeguard against any possibility of erosion, especially during earthworks. It has to safeguard against any spillages that may impact on ground water resources. The project has to be mindful of the adjacent watercourse given the fact that the river and its riparian vegetation, although outside of the development footprint, and 32 metres away from the watercourse, has been identified by eThekwini as D'MOSS. The project has to take into consideration of all the views expressed by stakeholders.

(M) BASED ON THE ASSESSMENT, AND WHERE APPLICABLE, IMPACT MANAGEMENT MEASURES FROM SPECIALISTS REPORTS, THE RECORDING OF THE PROPOSED IMPACT MANAGEMENT OUTCOMES FOR THE DEVELOPMENT FOR INCLUSION IN THE EMPr;

Erosion on site will be avoided through the implementation of a detailed Stormwater Plan, and following the recommendations of a Geotechnical report. The proposed Rehabilitation actions will be implemented as may be relevant. Care must also be exercised to prevent contaminated water, oil and fuel from migrating into the environment from both surface water runoff and from unlikely leaking of fuel storage tanks. There will be proper landscaping on project completion, making use of indigenous species as appropriate. All these measures have been incorporated onto the EMPr.

(N) ANY ASPECTS WHICH WERE CONDITIONAL TO THE FINDINGS OF THE ASSESSMENT EITHER BY THE EAP OR SPECIALIST WHICH ARE TO BE INCLUDED AS CONDITIONS OF AUTHORISATION;

Most of the aspects have been highlighted above, but one can emphasize the following:

Although the site is considered stable and suitable for development, and modified over years, however the geotechnical study has cautioned against a retaining wall constructed to support the slope along Rawat road. Engineering support regarding this area will have to be established during the earthworks and construction phase.

(O) A DESCRIPTION OF ANY ASSUMPTIONS, UNCERTAINITES, AND GAPS IN KNWLEDGE WHICH RELATE TO THE ASSESSMENT AND MITIGATION MEASURES PROPOSED;

None presented.

(P) A REASONED OPINION AS TO WHETHER THE PROPOSED ACTIVITY SHOULD OR SHOULD NOT BE AUTHORISED, AND IF THE OPINION IS THAT IT SHOULD BE AUTHORISED, ANY CONDITIONS THAT SHOULD BE MADE IN RESPECT OF THAT AUTHORISATION;

In the context and highlight of the significance scoring outlined above, the prosed project has low impact to the environment. The environmental management programme has been drafted and attached to this report which will serve as the guiding document under the supervision of the Environmental Control Officer in ensuring the implementation of the mitigation measures. In some instances, like geotechnical issues, cuttings on site some other specialists may be required to supervise specific areas of concern. The Watercourse Assessment rehabilitation measures will also be implemented.

Our assessment of the site is that the economic and social benefits to the community far outweighs the impacts that can be mitigated like underground water, soil erosion and so forth. This benefit talks to the jobs that are closer to where the community is living. The no-go alternative will offer very little benefit to the local and broader economy when one studies the findings of the Market Feasibility assessment and other Specialists studies.

Accordingly, it is the opinion of the EAP that there is no significant reason why the project cannot be authorized. It is the EAP's view that this development will far outweigh the impacts imparted by it. The site in question is already disturbed and impacted upon by previous developments. In addition, the site has existing buildings that will be demolished to make way for the proposed

Service Station and the drive thru.

It must be noted that the impacts mostly identified like soil erosion, possible impact on water resources, can be mitigated through strict implementation of the recommendations of Specialists studies and EMPr. The implementation of the mitigation measures outlined throughout this report and the EMPr are likely to provide a setting for the development to take place in a sustainable manner. Our overall analysis is that this activity must be authorized.

Overall, the identified impacts can be mitigated as long as the monitoring function is ongoing during the construction phase. The EMPr will be very crucial during all phases of the project.

(Q) WHERE THE PROPOSED ACTIVTY DOES NOT INCLUDE OPERATIONAL ASPECTS; THE PERIOD FOR WHICH THE ENVIRONEMNTAL AUTHORISATION IS REQUIRED, THE DATE ON WHICH THE ACTIVITY WILL BE CONCLUDED, AND THE POST CONSTRUCTION MONITORING REQUIREMENTS FINALISED;

The environmental authorization in this instance will include operational aspects, and has to be a lifetime requirement. The activity is likely to commence immediately after the environmental authorization is issued, of course if granted by the Department of Economic Development, Tourism and Environmental Affairs, with construction continuing for about 9 months subsequent to commencement.

(R) AN UNDERTAKING UNDER OATH OR AFFIRMATION BY THE EAP IN RELATION TO;

(i) the correctness of the information provided in the reports at the time of compilation;
(ii) The inclusion of comments and inputs from stakeholders and I&APs;
(iii) The inclusion of inputs and recommendations from the specialist reports where relevant; and
(iv) Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties; and

I,

confirm that the information provided in the report is correct;

The inclusion of comments and inputs from stakeholders and I&APs is correct;

The inclusion of inputs and recommendations from the specialist reports is correct;

Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties; and

Commissioner of oaths:

Commissioner: Place: Date:

(S) WHERE APPLICABLE, DETAILS OF ANY FINANCIAL PROVISIONS FOR THE REHABILITATION, CLOSURE, AND ONGOING POST DECOMMISSIOING MANAGEMENT OF NEGATIVE ENVIRONEMNTAL IMPACTS

The applicant will set aside funds for landscaping, as well as the eradication of invader alien plants on site. The latter will be done in terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) and related Regulations dated 2014.

(T) ANY SPECIFIC INFORMATION THAT MAY BE REQUIRED BY THE COMPETENT AUTHORITY; AND

The Competent Authority will have an opportunity to provide comments and inputs on this draft Basic Assessment Report.

(U) ANY OTHER MATTERS REQUIRED IN TERMS OF SECTION 24 (4)(a) AND (b) OF THE ACT.

NONE, as all issues relating to organs of state with jurisdiction on site have been covered. Furthermore, all impacts, alternatives, mitigation, option of not implementing an activity, issues of monitoring and assessment thereof have been addressed by this Basic Assessment report.

THE ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT is attached as **Appendix E.**