

From: ameesha@sesc.net
Sent: Wednesday, 13 July 2022 14:31
To: 'Wendy Kloppers'
Cc: 'betsy@sesc.net'; 'Ian Gildenhuys'; 'Gerswain Manuel'; 'Rabelani Gundula'
Subject: RE: DEADP REF: 16/3/3/1/A1/20/3027/22_POST-APPLICATION PUBLIC PARTICIPATION_DRAFT BASIC ASSESSMENT REPORT AND THE APPLICATION FOR ATMOSPHERIC EMISSION LICENSE FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, COCT

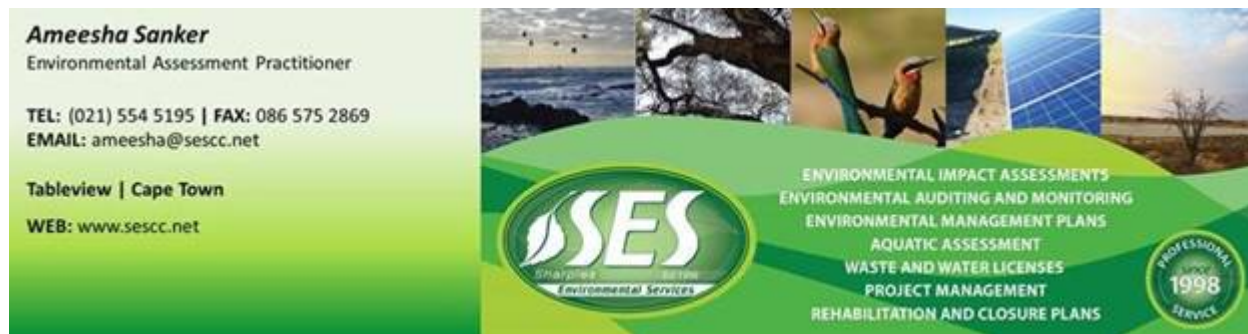
Tracking:	Recipient	Read
	'Wendy Kloppers'	
	'betsy@sesc.net'	
	'Ian Gildenhuys'	
	'Gerswain Manuel'	
	'Rabelani Gundula'	
	Betsy Ditcham	Read: 2022/07/15 07:07

Good day Wendy,

Hope you are well.

Thank you for the update, I confirm that the changes have been made to the Final I&AP Register, which will be distributed with the Final BAR to the competent authority.

Kind Regards,



From: Wendy Kloppers <Wendy.Kloppers@capetown.gov.za>
Sent: Wednesday, 13 July 2022 14:07
To: ameesha@sesc.net
Cc: betsy@sesc.net; Ian Gildenhuys <Ian.Gildenhuys@capetown.gov.za>; Gerswain Manuel <Gerswain.Manuel@capetown.gov.za>; Rabelani Gundula <Rabelani.Gundula@capetown.gov.za>
Subject: FW: DEADP REF: 16/3/3/1/A1/20/3027/22_POST-APPLICATION PUBLIC PARTICIPATION_DRAFT BASIC ASSESSMENT REPORT AND THE APPLICATION FOR ATMOSPHERIC EMISSION LICENSE FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, COCT

Good day Ameesha

Please add the following City of Cape Town officials - Air Quality Management Unit to the I&APs register:

Ian.Gildenhuys@capetown.gov.za
Wendy.Kloppers@capetown.gov.za
Gerswain.Manuel@capetown.gov.za

Head: Specialised Environmental Health Services
Regional Air Quality Practitioner
Senior Air Quality Practitioner

Please remove:
Rabelani.Gundula@capetown.gov.za

Thanks and kind regards

Wendy

From: Gerswain Manuel <Gerswain.Manuel@capetown.gov.za>
Sent: Tuesday, 12 July 2022 08:49
To: Wendy Kloppers <Wendy.Kloppers@capetown.gov.za>
Cc: Ian Gildenhuys <Ian.Gildenhuys@capetown.gov.za>; Rabelani Gundula <Rabelani.Gundula@capetown.gov.za>; Bronwyn Davidson <Bronwyn.Davidson@capetown.gov.za>
Subject: RE: DEADP REF: 16/3/3/1/A1/20/3027/22_POST-APPLICATION PUBLIC PARTICIPATION_DRAFT BASIC ASSESSMENT REPORT AND THE APPLICATION FOR ATMOSPHERIC EMISSION LICENSE FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, COCT

Good morning Wendy

Noted Wendy, I will review and prepare comment for review.

Regards

Gerswain Manuel
Senior Air Quality Practitioner
Community Service and Health: Air Quality Management
246 Voortrekker Road, Vasco 7460

Tel: 021 444 2914 | **Email:** Gerswain.Manuel@capetown.gov.za | **Web:** www.capetown.gov.za

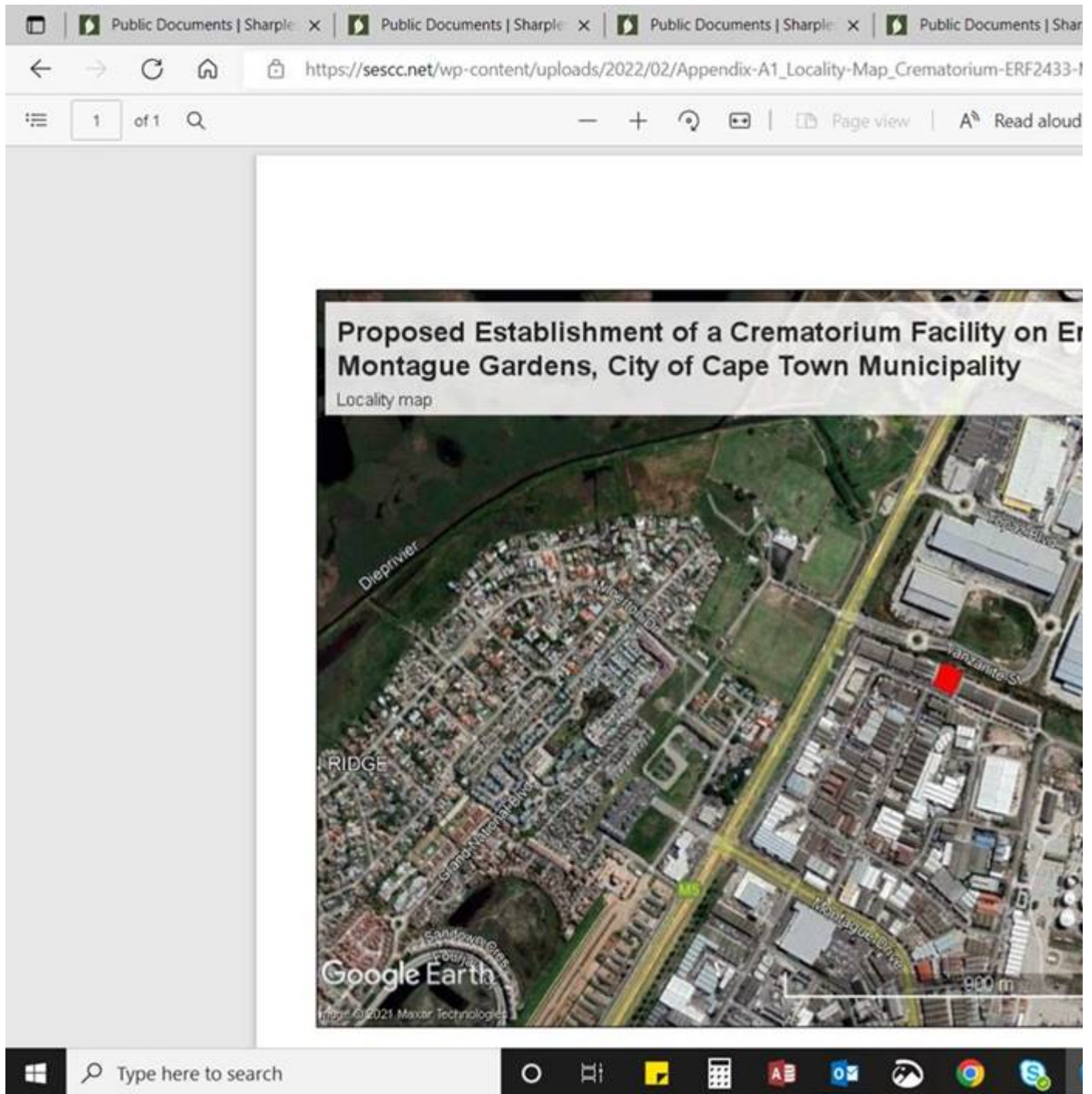
[CCT Contacts](#) | [CCT Media and News](#) | [Report a fault](#) | [Account Queries](#) | [Water Restrictions](#)



From: Wendy Kloppers <Wendy.Kloppers@capetown.gov.za>
Sent: Tuesday, 12 July 2022 08:43
To: Gerswain Manuel <Gerswain.Manuel@capetown.gov.za>; Bronwyn Davidson <Bronwyn.Davidson@capetown.gov.za>
Cc: Ian Gildenhuys <Ian.Gildenhuys@capetown.gov.za>; Rabelani Gundula <Rabelani.Gundula@capetown.gov.za>
Subject: FW: DEADP REF: 16/3/3/1/A1/20/3027/22_POST-APPLICATION PUBLIC PARTICIPATION_DRAFT BASIC ASSESSMENT REPORT AND THE APPLICATION FOR ATMOSPHERIC EMISSION LICENSE FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, COCT
Importance: High

Hi Gerswain

It seems as if this proposed facility is actually in your area.



- Please add to your WWS while we await Morne's response as when he requires our comments (Due date) for collating.
- Bronwyn please add this item to the database.

Kind regards

Wendy

From: Ian Gildenhuys <Ian.Gildenhuys@capetown.gov.za>

Sent: Monday, 11 July 2022 15:42

To: Morne Theron <Morne.Theron@capetown.gov.za>

Cc: Wendy Kloppers <Wendy.Kloppers@capetown.gov.za>; Rabelani Gundula

<Rabelani.Gundula@capetown.gov.za>

Subject: FW: DEADP REF: 16/3/3/1/A1/20/3027/22_POST-APPLICATION PUBLIC PARTICIPATION_DRAFT BASIC ASSESSMENT REPORT AND THE APPLICATION FOR ATMOSPHERIC EMISSION LICENSE FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, COCT

Importance: High

Hi Morne

Will you be coordinating comment on the below submission?

Regards

Ian Gildenhuys
Head Specialised Environmental Health
Air Quality Officer
Grade 1 EMI
Community Services and Health Directorate
246 Voortrekker Road, Vasco
Tel: 021 4448364 | **Cell:** 0842200139 | **Fax to email:** 086 576 1252
E-mail: Ian.Gildenhuys@capetown.gov.za | **Web:** www.capetown.gov.za



From: Gavin Heugh <Gavin.Heugh@capetown.gov.za>

Sent: Monday, 11 July 2022 15:28

To: Ian Gildenhuys <Ian.Gildenhuys@capetown.gov.za>

Cc: Nolundi Adonis <Nolundi.Adonis@capetown.gov.za>

Subject: FW: DEADP REF: 16/3/3/1/A1/20/3027/22_POST-APPLICATION PUBLIC PARTICIPATION_DRAFT BASIC ASSESSMENT REPORT AND THE APPLICATION FOR ATMOSPHERIC EMISSION LICENSE FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, COCT

Importance: High

Ian

Not sure if you have received this.

Gavin Heugh.

Head Environmental Health.

Area: North.

City Health Offices

1st Floor

Berkley Road

Maitland

Tel: +27 021 4441739

Cell: 0842200141



From: ameesha@sesc.net [<mailto:ameesha@sesc.net>]

Sent: Monday, 11 July 2022 13:17

Cc: 'Betsy Ditcham' <>

Subject: DEADP REF: 16/3/3/1/A1/20/3027/22_POST-APPLICATION PUBLIC PARTICIPATION_DRAFT BASIC ASSESSMENT REPORT AND THE APPLICATION FOR ATMOSPHERIC EMISSION LICENSE FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, COCT

Importance: High

CAUTION: This email originated outside of the City of Cape Town's network. Please do not click on any links or open attachments unless you know and trust the source. **STOP. THINK. VERIFY.**

Dear Commenting Authorities, Organs of State and/or Potential Interested & Affected Parties (I & AP's).

RE: NOTIFICATION OF THE 30-DAY POST-APPLICATION PUBLIC PARTICIPATION COMMENTING PERIOD ON DRAFT BASIC ASSESSMENT REPORT AND THE APPLICATION FOR ATMOSPHERIC EMISSION LICENSE FOR THE PROPOSED ESTABLISHMENT OF A CREMATORIUM FACILITY ON ERF 2433, MONTAGUE GARDENS, CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY, WESTERN CAPE (DEADP REF: 16/3/3/1/A1/20/3027/22).

Sharples Environmental Services cc (SES) has been appointed by Mr Sybrand Teubes of Ikamva Green Holdings, trading as Platinum Pride Crematorium, to undertake the environmental assessment for the application for Environmental Authorization, in the form of a Basic Assessment Report (BAR). In accordance with the National Environmental Management Act, 1998 (Act No. 107 of 1998), in terms of the Environmental Impact Assessment Regulations, 2014 (as amended 2017), for the Proposed Establishment of a Crematorium Facility on ERF 2433, Montague Gardens, City of Cape Town Metropolitan Municipality, Western Cape (DEADP REF: 16/3/3/1/A1/20/3027/22).

Yellow Tree (Pty) Ltd, was appointed by Mr Sybrand Teubes of Ikamva Green Holdings, trading as Platinum Pride Crematorium, to undertake the application for an Atmospheric Emission License (AEL) in accordance with Section 38 of the National Environmental Management: Air Quality Act (Act 39 of 2004), for the proposed development.

This email serves to inform you that the Post-Application Basic Assessment Report (Post-App DBAR) and the Air Emissions License (AEL) application is now being made available for comment.

A hard-copy of the document has been made available at the Milnerton Public Library. The document is also available for download from our website (<https://sesc.net/public-eia-documents-impact-assessment-reports/>).

Post-Application Public Participation Commenting Period: 11th July 2022 – 10th of August 2022.

As an identified key stakeholder, neighbouring property owner or relevant commenting authority, you have been identified as an automatically registered Interested & Affected Party (I&AP), providing you with the opportunity to review and comment on the Post-Application Basic Assessment Report. Should you **no longer wish to be registered as an I&AP** for this project,

indicating that you no longer wish to be included in future communications regarding this process, **please notify this office in writing.**

Please Note: Choosing to be registered as an I&AP or by submitting a comment, you consent to the lawful processing of your personal information in relation to the intended purposes, as described by the Protection of Personal Information Act, 2013 (Act no. 4 of 2013). Your personal information will be utilized for all processes relevant to this specific project, details of the terms, in compliance with the POPI Act, 2013, have been attached for your perusal. You also provide consent for your contact details to be made available to the competent authority, and to be reflected in our regulated reports that must be compiled and submitted for decision-making.

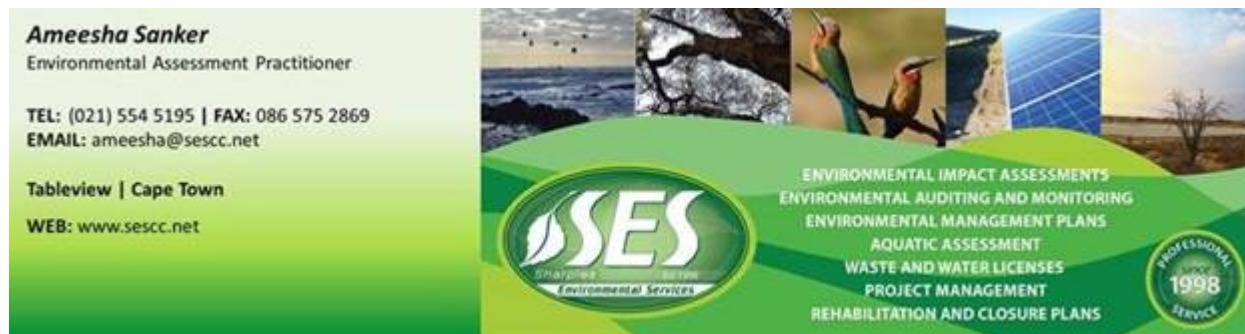
The **Post-App BAR** is available for **comment until 10th of August 2022.** Comment on the **DBAR** and proposed activity must therefore be submitted **in writing on or before 10th of August 2022,** by means of the following: **Fax: 086-575 2869, email: ameesha@sesc.net or postal address: PO Box 443, Milnerton, 7435.**

The **AEL** is available for comment **until 10th of August 2022.** To obtain a copy of the document kindly contact Ms Caitlin Morris (Yellow Tree): Tel: 083 566 2552 | email: caitlin@yellowtree.co.za | Post: Unit D14, Prime Park, Mocke Road, Diep River, 7800.

Please do not hesitate to contact me if you have any queries.

Thank you.

Kind Regards,



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This message has been analyzed by Deep Discovery Email Inspector.



11 August 2022

Sharples Environmental Services
P.O. Box 443
MILNERTON
7435

Attention: Ms Ameesha Sanker

Email: ameesha@sesc.net
(Tel: 021 554 5195)

Dear Madam

**ERF 2433, No 55 STELLA ROAD, MONTAGUE GARDENS: PROPOSED ESTABLISHMENT OF A CREMATORIUM –
DRAFT BASIC ASSESSMENT REPORT AND AEL
(DEA&DP REFERENCE: 16/3/3/1/A1/20/3027/22)**

The draft Basic Assessment Report (DBAR), submitted under your cover letter, dated 11 July 2022, pertaining to the abovementioned project, refers.

The following comment is provided from the relevant City of Cape Town Departments based on the information provided in the Draft BAR:

1. Spatial Planning and Environment Directorate: District Planning and Mechanisms Branch

- 1.1 The District Planning and Mechanisms Branch indicated that the location of preferred Alternative 1 appears appropriate from a spatial planning perspective. Erf 2433, Montague Gardens is located within an established industrial area. Erf 2433 is located near a Risk zoned tank farm to the north of the site, which already has exclusion zones/buffers around it. In addition, there are numerous other Major hazardous installations in Montague Gardens. This aforementioned position is however held on condition that the proposed location is also compliant to other applicable regulations/legislation, notably the Management of Human Remains R363 of 2013, promulgated in terms of the National Health Act 61 of 2003 (refer to point 4.4 below).
- 1.2 The preferred Alternative 2 site is not appropriate from a land use compatibility perspective. Should the applicant want guidance on alternative sites, as requested by the Air Quality Management (refer to points 3.7 and 4.3.2 below), they can liaise with the acting Manager: Metropolitan Spatial Planning Branch - Annelise.debruin@capetown.gov.za for assistance.
- 1.3 The overall principle of an additional crematorium within the City of Cape Town's jurisdiction encouraged in terms of supporting a compact and efficient urban form.

2. Spatial Planning and Environment Directorate: Development Management Branch

- 2.1 The Development Management Branch indicated that Erf 2433, Montage Gardens is zoned for General Industrial 1 (GI1) use. In terms of the City of Cape Town Development Management Scheme (DMS) a crematorium facility is permitted as a primary right in terms

of the General Industrial 1 (GI1) zoning. The aforementioned is sufficiently reflected under the General Project Description section (page 4 of 169) of the DBAR.

3. Spatial Planning and Environment Directorate: Environmental Management Department - Environmental and Heritage Management Branch

DBAR

- 3.1 Section A: *Administrative Details* (Pages 18 and 19 of 169): Please replace Mr L Mbandazayo's name as the City of Cape Town contact person with Ms S. Warnich-Stemmet, Tel: 021 440 0598, E-mail: Sonja.Warnichstemmet@capetown.gov.za)
- 3.2 Section C: *Legislation/Policies*, sub-section 3: *Other legislation* - National Health Act (page 25 of 169): The statement is made that the term "*habitable dwellings*" is not defined in the National Health Act, therefore other forms of acceptable legislation such as the Rental Housing Act, 2014 "*habitable*" definition was considered. As this facility is being proposed within the jurisdiction of the City of Cape Town, it is worthy to note that the City of Cape Town Development Management Scheme defines "*dwelling house*", "*dwelling unit*" and "*habitable space*" respectively as follow:
- '*dwelling house*' means a building containing only one dwelling unit, together with such outbuildings as are ordinarily used with a dwelling house, including domestic staff quarters.
 - '*dwelling unit*' means a self-contained, interleading group of rooms, with not more than one kitchen, used for the living accommodation and housing of one family, together with such outbuildings as are ordinarily used therewith, but does not include domestic staff quarters, or tourist accommodation or accommodation used as part of a hotel.
 - '*habitable space*' means space used, designed, adapted or intended to be used by persons for sleeping in, living in, preparation or consumption of food or drink, transaction of business, rendering of services, manufacturing, processing or sale of goods, performance of work, gathering together of persons or for recreational purposes.
- 3.3 Section C: *Legislation/Policies*, sub-section 3: *Other legislation* – NEM: AQA (page 30 of 169): Table 5 lists a comprehensive list of schools located in relation to Erf 2433. However, the new secondary school built in 2016, situated on Erf 37360, cnr Omuramba Road and Freedom Way, Marconi Beam does not appear to be on the list. Refer to Figure 1 below for convenience.

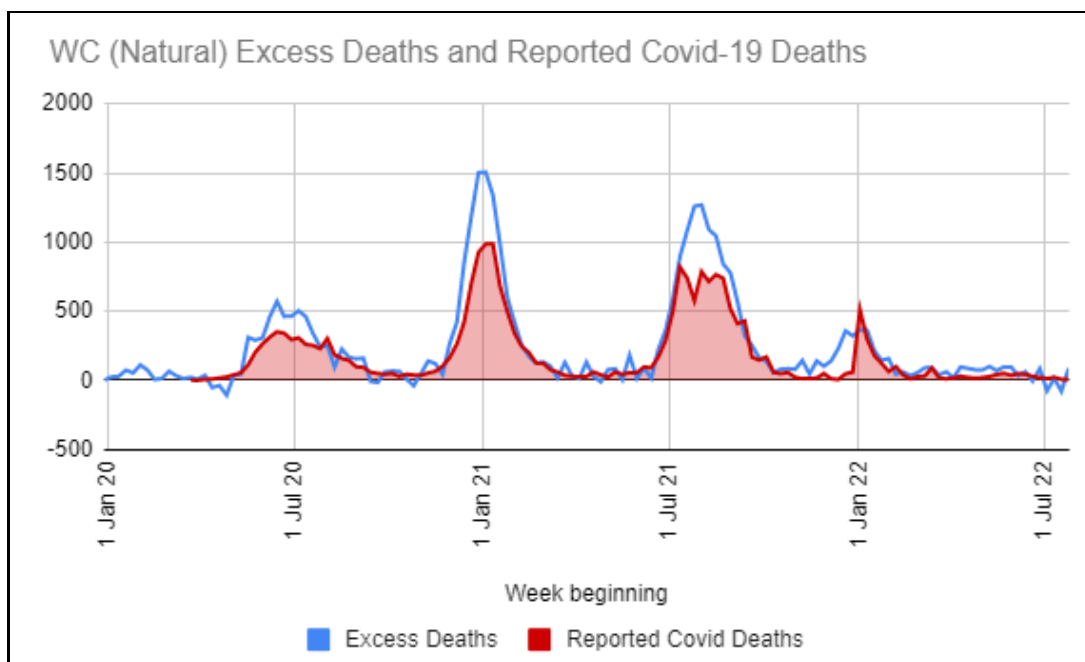


FIGURE 1: New secondary school located on Erf 37360, Marconi Beam (being 2,6km south of Erf 2433, Montague Gardens)

- 3.4 Section E: *Planning Context and Need and Desirability*, Sub-section 4.3 *The spatial development Plan of the local municipality* (page 50 of 169): The unprecedented increase in the death rate as a result of the Covid pandemic is undeniable during the period March 2020 to January 2022. However, according to the latest SA Medical Research Council and the Johns Hopkins University CSSE data the Western Cape¹ and South African² death rate attributed to Covid cases has decreased significantly over the past six (6) months (Refer to the graph below).

¹ Source: SA Medical Research Council [Report on Weekly Deaths in South Africa | South African Medical Research Council \(samrc.ac.za\)](https://samrc.ac.za/)

² Source: Covid-19 Data Repository by the CSSE at John Hopkins University [GitHub - CSSEGISandData/COVID-19: Novel Coronavirus \(COVID-19\) Cases, provided by JHU CSSE](https://github.com/CSSEGISandData/COVID-19)



Therefore, it is cautioned to kindly avoid referencing sensationalistic media articles, as cited on pages 83 to 84 of the DBAR. It is advised to reference accredited medical sources if the argument is made that an additional crematorium facility is required due to Covid-19.

- 3.5 Section F: *Public Participation*, sub-section 3 (page 67 to 69): The names of City of Cape Town officials listed under the Organs of State table is incorrect. A number of the officials that are listed do not deal with applications in the Blaauwberg area, Northern Region of the City. Be advised that the Environmental Management Department (EMD) is the official entry- and exit point for EIA comment in terms of the City of Cape Town's Systems of Delegation. As such you do not need to circulate your DBAR to random internal city departments. EMD will assess the DBAR and circulate the report internally in order to ensure that the relevant departments receive the report. Thereafter you will be provided with one singular co-ordinated City comment. As such, please remove the lists of *ad hoc* city official names and only retain the following:

- Ms S. Warnich-Stemmet, Tel: 021 440 0598, E-mail: Sonja.Warnichstemmet@capetown.gov.za

In light of the simultaneous Air Emission Licence (AEL) application being circulated the following City of Cape Town: Air Quality Management officials' names must also be listed:

- Air Quality Officer - Ian Gildenhuys, ian.Gildenhuys@capetown.co.za,
- Regional Air Quality Practitioner – Wendy Kloppers, wendy.kloppers@capetown.co.za
- Senior Air Quality Practitioner - Gerswain Manuel, Gerswain.manuel@capetown.gov.za

This should also be reflected in the FBAR.

- 3.6 Section F: *Public Participation*, sub-section 3 (page 67 to 69): Be advised that Erf 2433 falls with an area where Eskom is the Supply Authority and not the City of Cape Town. As such ensure that comment is obtained from Eskom with regards to services infrastructure availability.
- 3.7 Section H: *Alternatives, Methodology and Assessment of Alternatives*: Table 8: *Comparative site alternatives* (pages 92 to 94): The fact that the land owner of Alternative 2 (Erf 358,

Blackheath Industria) does not agree to the use of a crematorium on his property renders this alternative null-and-void. This means this DBAR effective has zero site location alternatives. The lack of alternative site location selections is questioned as it renders the NEMA requirement to assess viable site alternatives pointless? The opinion is held that the proponent and/or EAP should include pragmatic site location alternatives that are actually available for consideration.

- 3.8 The utilization of LPG gas as preferred fuel source is considered to be the most appropriate.
- 3.9 On page 105 there appears to be typing errors "*From a socio-economic perspective, crematoriums **are** better suited than a [~~crematorium~~] **cemetery**, as they are ...*". Please correct this statement.
- 3.10 Potential impact: Social Impact - Visual (pages 121 to 123): Erf 2433 is currently devoid of any landscaping both on-site and along the Stella Road reserve abutting the property as is evident from Figure 2 below. In addition to the proposed visual mitigation measures already listed in the DBAR it is suggested that landscaping be implemented in order to improve the Stella Road interface. The position of the existing municipal services (i.e. water, sewer and/or stormwater) does not impede the possibility to introduce some trees and shrubs in the on-site parking area and the Stella Road reserve abutting the property. Therefore, the submission of a Landscape Plan to the City of Cape Town: Head: Environmental & Heritage Management must be included as a mitigation measure under this section, as well as in the draft EMPr.



FIGURE 2: Erf 2433, MGI: Aerial view and Plan viewer [with Water (blue), Sewer (red) and Stormwater (green) services location in relation to the erf boundaries]

Draft EMPr (SES Ref: CT24/EMPR/07/22), dated July 2022

- 3.11 Section 4.2: *Technology* (page 6): It is stated that the Johnson Thermal Engineering (JTE) BA2 cremators has a proven track record. List a few locations in South Africa where the JTE BA2 cremators have successfully been installed (e.g. Lenasia and Tshwane)).
- 3.12 Section 17.2.2: *ECO Inspections – Witten Records* (page 78): Copies of the monthly ECO reports must also be provided to the City of Cape Town: Head: Environmental & Heritage Management.

4. **City Health: Specialised Environmental Health Services: Air Quality Management Branch**

The following concerns and from an Air Quality Management perspective must be addressed:

- 4.1 Based on the information provided, it is evident that the proposed activities trigger a listed activity Category 8: Thermal Treatment of General and Hazardous Waste, Sub-category 8.2 Crematoria and Veterinary Waste Incineration in terms of the National Environmental Management: Air Quality Act 39(NEM: AQA), Listing Notice No. 893, dated 22 November 2013. In this regard the applicant must demonstrate that the proposed equipment can achieve compliance to the New Plant Standards below:

Description:		Cremation of human remains, companion animals (pets) and the incineration of veterinary waste	
Application:		All installations	
Substance or mixture of substances		Plant status	mg/Nm ³ under normal conditions of 11% O ₂ , 273 Kelvin and 101.3 kPa.
Common name	Chemical symbol		
Particulate matter	N/A	New	40
		Existing	250
Carbon monoxide	CO	New	75
		Existing	150
Oxides of nitrogen	NO _x expressed as NO ₂	New	500
		Existing	1000
Mercury (Applicable to human cremation only)	Hg	New	0.05
		Existing	0.05

- 4.2 The report indicates that the proposed facility will be located in a General Industrial 1 (General Industry Subzone GI1) zoned area in Montague Gardens, which houses other general industrial activities. However, it is noted that the closest residential habitable areas are Milnerton and Bothasig, respectively approximately 300m to the West and 1 km to the East of the proposed facility as well as the closest school, which is regarded as a sensitive receptor trigger which is +/- 0.9 km West of the proposed activity. (As referred in to Table1, page 19 of Atmospheric Impact Report).

- 4.2.1 With regard to the above, from an air quality management perspective, the close proximity to human habitation and sensitive receptors, is of concern, as the operation of the facility may have potential health risks and nuisances on the receiving environment if not managed in accordance with the required legislative context and provisions.

- 4.3 With reference to Section H: *Alternatives, Methodology and Assessment of Alternatives* (page 90 of 169 of the DBAR) it is noted that the proposed Site Alternative 2 location is on Erf 358 Blackheath Industria, which according to the report is approximately 400m away from the Rustdal residential area. The location of the alternative site in relation to proximity to sensitive receptors raises similar concerns as noted in 4.2.1 above.

- 4.3.1 In order for Site Alternative 2 to be satisfactory alternative site, the proponent will be required to undertake a full evaluation and review in order to establish whether it can be deemed as a satisfactory alternative.

- 4.3.2 The City of Cape Town: Air Quality Management Branch recommends that the proponent engage the City's Spatial Development Department who are able to advise of other areas (alternative site/s) that are specifically zoned to accommodate the impact of industrial activities on the environment.

- 4.4 Further, please note that both the preferred and the alternative site may not comply with the Regulations related to the Management of Human Remains R363 of 2013, promulgated

in terms of the National Health Act 61 of 2003, which requires a 500m separation distance from Crematoria to habitable dwellings. This being the case, an application for exemption, would need to be made to the Director General of the National Department of Health, who has the mandate to grant an exemption to this provision. City of Cape Town: Air Quality Branch recommends that this matter be investigated further and addressed in the final BAR (FBAR).

- 4.5 It was noted that the report refers to the City's Air Quality Management (AQM) Bylaw 7662 dated 2016 as amended. However, it is imperative that the operations must comply with all the applicable provisions therein.
- 4.6 The DBAR indicates that the proposed cremators/furnaces to be utilized are BA2 Cremators and the supplier is Engineered Thermal Systems (Pty) Ltd. For the City of Cape Town: Air Quality Management Branch's understanding and decision making purposes:
 - 4.6.1 Provide supporting documentation regarding the design and specifications of the cremator, burner, and associated stacks. It is noted that six stacks will be installed; the Air Quality Management Branch recommend that a higher common stack be considered, as this may reduce the cost pertaining to annual Minimum Emission Standards (MES) monitoring and reporting.
 - 4.6.2 Supply the process flow diagram, a detailed explanation on the unit processes and a site layout to indicate all point/area sources etc.
 - 4.6.3 In the event that a positive environmental authorisation decision is granted, the applicant will be required to ensure that the cremators are operated in a manner as specified by the manufacturer's instructions. The proponent is required to engage with City of Cape Town: Air Quality Management Branch supplier to provide written confirmation that the operation of the proposed incinerator and associated stacks will comply with the new plant MES.
 - 4.6.4 Please be advised that it is the responsibility of the holder of the authorisation to ensure that the operator/s is fully trained to operate all equipment.
- 4.7 The proposed recommendations as documented in Section I: *Findings, Impact Management and Mitigation Measures* (pages 148 of 155 of the DBAR) on and the EMPR dated July 2022 must be adhered to at all times.
- 4.8 It was noted that the Draft Atmospheric Impact Report, No. YTC1547SES/02, dated 24 May 2022, was scrutinised and from an air quality management perspective, City of Cape Town: Air Quality Management Branch hereby wish to comment as follows:
 - 4.8.1 "This report fulfils the requirements for both the Specialist Air Quality Impact Assessment and the AIR and has been conducted in accordance with the Regulations Prescribing the Format of the Atmospheric Impact Report (G.N.R. 747 of 2013), the Regulations Regarding Air Dispersion Modelling (G.N.R. 533 of 2014) and Appendix 6 of the EIA Regulations (G.N.R. 982 of 2014)".
 - 4.8.2 With reference to Section 4.2, Process Description of the Report:
 - 4.8.2.1 It was noted that the establishment of the proposed crematorium will be undertaken in two phases. Phase one, comprising of two cremators and Phase two comprising four cremators, which will operate for twenty-four (24) hours daily.
 - 4.8.3 With reference to Table 5. Comparison between MES Emissions Rates and Emissions Factors Emissions Rates, it is noted that the emission factor emission rates are higher than the MES emission rates for CO, NOx and Hg, that was used in the model as specified in the code of practise.
 - 4.8.4 With reference to Section 5.4. Appliances and Abatement Equipment Control Technology.

- 4.8.4.1 It is noted that the cremator/incinerator and stacks/s are not coupled to any abatement equipment to reduce emissions and impact on the receiving environment. This is a concern, as many cremators in South Africa are not achieving compliance with the New Plant Minimum Emission Standards (MES), without abatement equipment being installed. Furthermore, the Health Screening Assessment recommends the installation of abatement equipment.
- 4.8.4.1.1 Therefore, City of Cape Town: Air Quality Management Branch strongly recommends that the applicant investigates and consider suitable abatement equipment that is compatible with the cremators. Once concluded, City of Cape Town: Air Quality Management Branch further require that such information be provided in the final BAR.
- 4.8.5 With reference to Section 7.5. Modelling Procedure, it is noted that a Level 2 assessment was used based on Section 2.1.2 of the Code of Practice. The model was undertaken using the AERMOD View Version 10.2.1 interface and AERMET View Version 10.2.1 pre-processor.
- 4.8.6 City of Cape Town: Air Quality Management Branch note some inconsistencies in the Units of measure used in the various pollutants reported, where the Table shows the data in ppb, whilst the pollution isopleths use Micrograms/M³ e.g. Table 23 and Figures 32& 33 as well as Table 26 and Figures 34 and 35. This inconsistency should be rectified and a consistent unit of measure is to be used across the tables and the isopleth figures, in the final report, where possible.
- 4.8.7 With reference to Section 7.6.4 - NO₂, it is noted that the maximum predicted fence line concentration is 193 ppb which is higher than the hourly NAAQS standard for NO₂, which is 106 ppb. However, the concentration rapidly decreases with distance from the site, and no NAAQS exceedances are predicted at any sensitive receptors. The ambient annual NO₂ concentration at the fence line is predicted to comply with the annual NAAQS for NO₂.
- 4.8.8 In order to address the predicted exceedances of the NO₂ hourly ambient air quality standard off-site, the Specialist must identify an alternative stricter NO₂ emission rate that can be applied to the facility in the event that the Environmental Authorisation is granted and a further decision is made to issue the Atmospheric Emission Licence, by the AEL competent authority.
- 4.8.8.1 City of Cape Town: Air Quality Management Branch is concerned that the cumulative impacts of the various listed and non-listed activities taking place in close proximity to the proposed Crematorium have not been adequately considered in the Atmospheric Impact Report e.g. the existing NEM:AQA listed activities (Astron Energy, Permoseal, BP, Engen, Cape Precious Metals are all in close proximity) and facilities operating coal-fired boilers such as Gayatri Paper and Novus Printing Works located in Montague Gardens. In this regard, the Air Quality Specialist is requested to review the report and provide further comment on the cumulative impact of these emission sources on the receiving environment.

4.8.8.2 City of Cape Town: Air Quality Management Branch notes the ambient air quality data uncertainty and data gaps from the City's own ambient air quality monitoring network. As such it is encouraged that the ambient monitoring data from ESKOM's Edgemead monitoring station (which has excellent data recovery rates), also be reviewed. Access to this data can be facilitated through ESKOM's Environmental Department.

4.9 City of Cape Town: Air Quality Management Branch further acknowledges that this report forms part of the Public Participation Process (PPP) and is undertaken by Sharples Environmental Services as the independent Environmental Assessment Practitioner (EAP), as prescribed by Section 38 of NEM: AQA. Once the PPP has been concluded, a Public Participation Report must be compiled and submitted as supporting documentation with the Atmospheric Emission Licence (AEL) Application. Should objections be received, such objections must be adequately addressed by the EAP and reported to the Air Quality Officer. Should no objections be received a declaration must be signed, as proof thereof.

4.9.1 The Atmospheric Emission Licence application must be made in terms of the 2017 National Framework for Air Quality Management in the Republic of South Africa, No.1144 of 26 October 2018, Section 5.6 you are compelled to apply via the System for National Atmospheric Emissions Licencing (SNAEL) Portal website www.saaelip.environment.gov.za/SAELIP , to the City of Cape Town as the licencing authority.

4.9.2 An AEL processing fee will be levied as prescribed by the Regulations 250 of 11 March 2016, Annexure A (below). The fees must be paid prior to the processing of your AEL application. Upon application, an official invoice will be generated to facilitate payment processing. Proof of payment must be submitted in order for the AEL application to be processed. Below is the excerpt from the Regulation:

ANNEXURE A			
The processing fees are as follows:			
Application for new atmospheric emission licence	Application for atmospheric emission licence review	Application for atmospheric emission licence renewal	Application for atmospheric emission licence transfer
R10 000 per listed activity	R10 000 per listed activity under review	R5 000 per listed activity	R2 000

4.9.3 Should the Department of Environmental Affairs and Development & Planning (DEADP) grant the authorisation, it must be uploaded as supporting documentation on SAAELIP.

4.10 Compliance with Section 35 of the NEM: AQA as amended -Part 6: Measures in respect or dust, noise and offensive odours.

4.10.1 With reference to Section 12 Environmental Impact Management: Post Construction Phase & Operational Phase of the EMPR.

4.10.2 The fugitive emissions pertaining to the handling, storage and disposal of ash as a waste product must also be taken into consideration so that it does not cause any nuisances.

4.10.3 A Fugitive Emissions Management Plan (FEMP) will be required to include the applicable method statements applicable to air pollution to include at least the following:

- 4.10.3.1 Identify all possible sources of odour and dust within the affected area.
- 4.10.3.2 Detail the best practical environmental measures to be undertaken to mitigate odour and dust emissions.
- 4.10.3.3 Detail the implementation schedule.
- 4.10.3.4 Identify the line management responsible for the implementation.
- 4.10.3.5 Establish a register for recording all complaints received by the responsible person as well as the recording follow-up actions and responses regarding the complaints.

4.11 The holder of the Authorisation must ensure that all aspects detailed in the EMP must be sustainable and implemented during all phases of the project.

4.12 Should it be necessary, the AQO reserves the right to call for compliance with the National Dust Control Regulations, R 827 of 2013 promulgated in terms of the National Environmental Management: Air Quality Act 39 of 2004 as amended.

4.13 The Air Quality Management Unit reserves the right to call for further requirements in through the Atmospheric Emission Licensing application process, should it be deemed necessary.

5. **Safety and Security: Fire and Rescue Services**

The Fire and Rescue Services indicated the following:

- 5.1 A fire plan which complies with SANS 10400-T:2020 and the By-Law relating to Community Fire Safety of 2002 will have to be submitted prior to approval from Fire and Rescue Services.
- 5.2 The applicant's is cautioned that in terms of the National Health Act, 2003 Regulations relating to the management of human remains, a crematorium may not be built within 500 metres of a habitable building.

6. **Water & Sanitation Department: Water Demand Management Branch**

The Water Demand Management Branch indicated that Erf 2433, Montague Gardens is served by good water and sanitation infrastructure with substantial capacity. The DBAR however did not specify the amount of potable water that will be utilized by the crematorium and/or for what activities the water will be used? The anticipated average annual daily demand (AADD) of water must therefore be specified in the final BAR.

- It is anticipated that dust will be generated, whilst the cleaning of equipment will also take place (possibly by means of chemicals usage).
- The domestic use by people working at the crematorium is anticipated to be minimal.
- Interim feedback from the Water & Sanitation: Water pollution control unit cautioned that any wet-waste regarded will be considered to be industrial waste. The disposal of industrial waste will have to comply with pollution control bylaws. Depending on the type of activities the water will be used for, and the pollutants in the runoff, pre-treatment may be required before the runoff are disposed into the sewer network.

6.1 Water Reticulation:

The site is served by a 200mm water supply at a peak pressure of 59m. The current water consumption of the property to be redeveloped is 2.88kl/day as reflected in the Figure 3 data below.

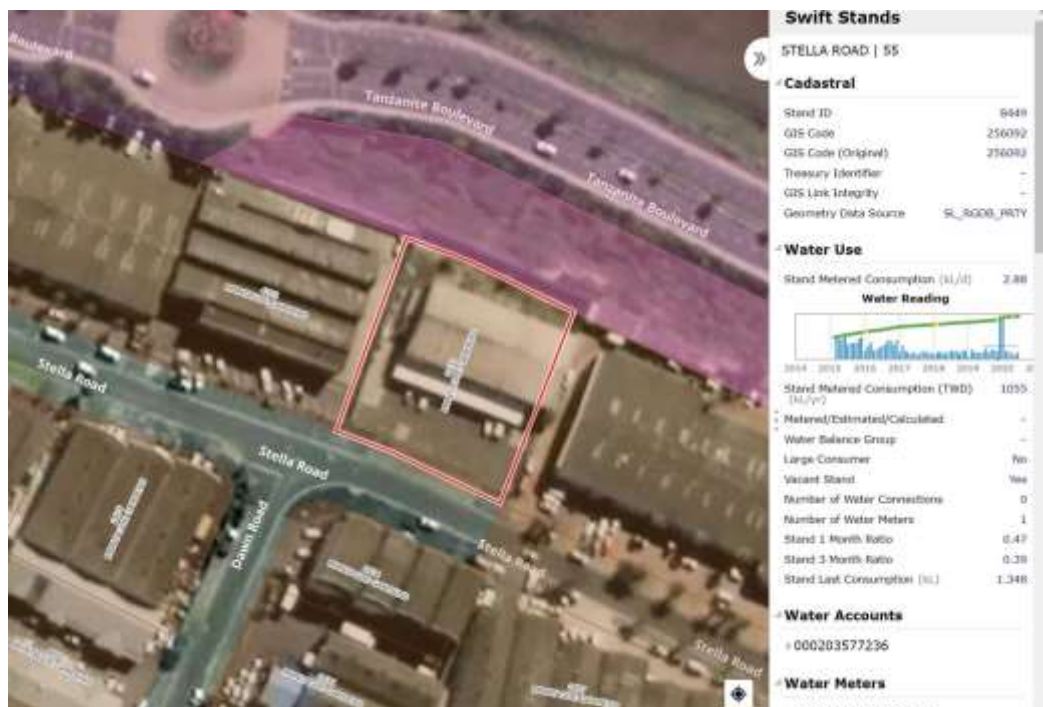


FIGURE 3: Current water consumption of Erf 2433, Montague Garden being 2.88kl/day

- 6.2 **Bulk Water:**
There is likely sufficient bulk water capacity.
- 6.3 **Sewer Reticulation:**
The site is served by a 150mm sewer in Stella Street and a 225 mm sewer at the north Side of the site. Sewer flows to Koeberg Road Pump Station which has been identified for an up-grade over the next few years.
- 6.4 **Water Pollution Control:**
It is reiterated that in the event of the proposed development discharging any industrial type effluent into the municipal sewers, an application to discharge industrial effluent into municipal sewer system will be required.
- The business owner essentially need to apply to Shahied Solomon (Shahied.Solomon@capetown.gov.za) or Molepana Ramonyai (Molepana.Ramonyai@capetown.gov.za) for permission to discharge. These City Officials will be able to guide the developer/owner with regards to the process.
- 6.5 **Wastewater Treatment Works:**
The proposed development drains to the Potsdam Wastewater Treatment Plant (WWTW). The Potsdam WWTW is currently at capacity and is being upgraded. Completion date for the upgrade is expected to be the 4th quarter of 2027.
- 6.6 **Water Demand Management Branch's Conclusion:**
- 6.6.1 Provided the water consumption is below the 2.88kl/day for the proposed redevelopment water and sewer capacity could be accommodated.
- 6.6.2 Once the actual estimated water consumption and the activities for water usage is provided in the Final BAR the city will be able to confirm final water and sanitation infrastructure capacity.

General/ Disclaimer

1. Information provided is based on best available data.
2. The flows and pressures provided in this comment are theoretical and not measured.

7. **Recreations and Parks Department: Cemetery Management Branch**

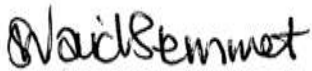
The Branch indicated the following:

- 7.1 The City of Cape Town is facing critical grave shortages in local municipal Cemeteries. This will result in families having to travel a lot further (40Km+) in future to find burial space. The creation of additional crematorium facilities is therefore encouraged, as cremated remains may be added to full family graves, thereby reusing existing graves locally.
- 7.2 The current limited number of crematoria in the Western Cape proved to struggle during the past Covid 19 Pandemic, therefore additional crematoria facilities will be beneficial to the greater Western Cape Province. There is currently no crematorium in West Coast District as the crematorium Malmesbury closed down. This results in residents in the West Coast being discouraged to cremate from this region, having to pay extra for transporting deceased to Maitland or Durbanville for Cremation.
- 7.3 The cost of establishing crematoria is significantly due to a lack of supply and demand disparity. As such the creation of additional crematoria could contribute to keep costs more competitive.

CONCLUSION

The above-mentioned City of Cape Town comment must be addressed and included in the Final Basic Assessment Report (FBAR). A copy of the FBAR and final decision, issued by the Competent Authority, must kindly be submitted to the City of Cape Town for record purposes.

Yours sincerely



Sonja Warnich-Stemmet

**Head: Environmental and Heritage Management Branch-Northern Region
Environmental Management Department**