



ATLANTIC BEACH

SLR Consulting (South Africa) (Pty) Ltd
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Newlands on Main,
Corner of Main and Campground Roads,
Newlands,
Cape Town
7700

24 April 2024

To Whom It May Concern

COMMENT ON WESCO WASTE MANAGEMENT FACILITY PRE-APPLICATION DRAFT SCOPING REPORT

We act on behalf of the Atlantic Beach Homeowners Association (ABHOA), who have previously registered with yourselves as an Interested and Affected Party (I&AP) in relation to this process.

On behalf of the ABHOA we hereby object to the proposed Waste Management Facility (WMF) as set out in the Draft Scoping Report (DSR). We take note that further public participation and opportunity to comment will form a part of the statutory requirements of the Environmental and Social Impact Assessment (ESIA) process, which forms a prerequisite to the following authorizations that would be required in terms of law for the above mentioned facility to be permitted to operate:

- A **Waste Management Licence** (WML) in terms of the National Environmental Management: Waste Act, 2008 (No. 59 of 2008) (NEM:WA);
- An **Environmental Authorisation** (EA) in terms of the National Environmental Management Act, 1998 (No. 107 of 1998) (NEMA) and Environmental Impact Assessment (EIA) Regulations, 2014 (as amended); and

- A **Water Use Licence** (WUL) in terms of National Water Act, 1998 (No. 36 of 1998) (NWA).

As the DSR correctly points out, other authorizations will also be required. Notably the subject property for which the facility is being considered, Cape Farm 32, portion 1 is zoned Agricultural and therefore an application for a consent use to permit a “utility service” in terms of the Municipal Planning By Law will be required. The ABHOA would like it noted that it wishes to be considered by the applicant and the City as an I&AP that must be formally given the opportunity to comment as part of that process as well.

Background:

The DSR provides the following information regarding of the nature and location of the WMF that is being formally applied for:

The Applicant, Wesco Waste Management Facility (Pty) Ltd (Wesco), a subsidiary of Interwaste Holdings (Pty) Ltd, which is owned by the Séché Environnement Group (Séché), is proposing to construct and operate a new Integrated Waste Management Facility on Portion 1 of the Farm Brakkefontein No. 32 (the “subject property”), located approximately 5 km south of Atlantis Industrial and 2 km north-east of Duynfontein (see Figure 1). The registered landowner for the subject property is Varenne Investments (Pty) Ltd, also a subsidiary of Séché.

The proposed WMF aims to offer waste minimisation, recovery, recycling, treatment and disposal services for general and hazardous wastes from municipal and private clients. Wastes would be transported to the proposed Wesco WMF via road and/or rail.

To unpack this a bit further, the DSR states that the waste minimization/recovery facilities include:

- A Clean Material Recovery Facility (sorting, shredding, baling and storage of general waste for transport to market);
- A Refuse Derived Fuel manufacturing plant (combustible waste eg plastics to be shredded and baled and then sold to third parties as fuel);
- A Safe Destruction Facility (for sensitive wastes eg pharmaceuticals, confidential documents).

The recycling and treatment facilities would include:

- Organic waste pre-processing plant;
- Producing compost from garden waste (10 tonnes per day capacity);

- A bioremediation facility (treatment of waste contaminated by oil and other hydrocarbons up a capacity of 100 tonnes per day);
- Builder's rubble sorting and crushing to create recovered building aggregates for sale;
- A waste treatment facility (for treatment of waste prior to disposal to landfill with a capacity to treat up to 500 tonnes per day);
- An effluent treatment plant to treat liquid waste streams (from third parties) and leachate. Notably some of the treated water could be discharged into the Donkergat River, a tributary of the Sout River.

The disposal aspect which would include a landfill with an ultimate footprint of 164Ha, would be to handle in excess of 500 tonnes of waste per day and could be able to operate for an estimated period of 30-50 years.

Other facilities include a public waste drop-off area and offices buildings, storage facilities etc.

In terms of access, the DSR states the following:

One of the criteria for purchasing the subject property was the presence of the existing railway line on the eastern boundary. The proposed railway siding allows for the transfer of waste from more distant locations via rail.

Access to the Wesco WMF would be restricted via gate with controlled access and the perimeter of the facility would be fenced. Road access to the facility would be via a surfaced road with a minimum width of 8 m.

Location of the ABHOA:

The Atlantic Beach Estate is located about 9km south west of the proposed WMF as the crow flies. The Estate comprises about 860 upmarket homes. It includes a golf course along with a club house, restaurants and other facilities which are leased from the City by the ABHOA. The ABHOA and its team are responsible for the management of the Estate and for representing the interests of its homeowners. The Estate is highly sought after, has won numerous awards and hosts the annual Presidential Golf Day. It is pertinent to note that a key means of accessing the Estate from the rest of the City and Region, is the R27 (West Coast Road), which is also a key potential route that will be used to access the WMF.

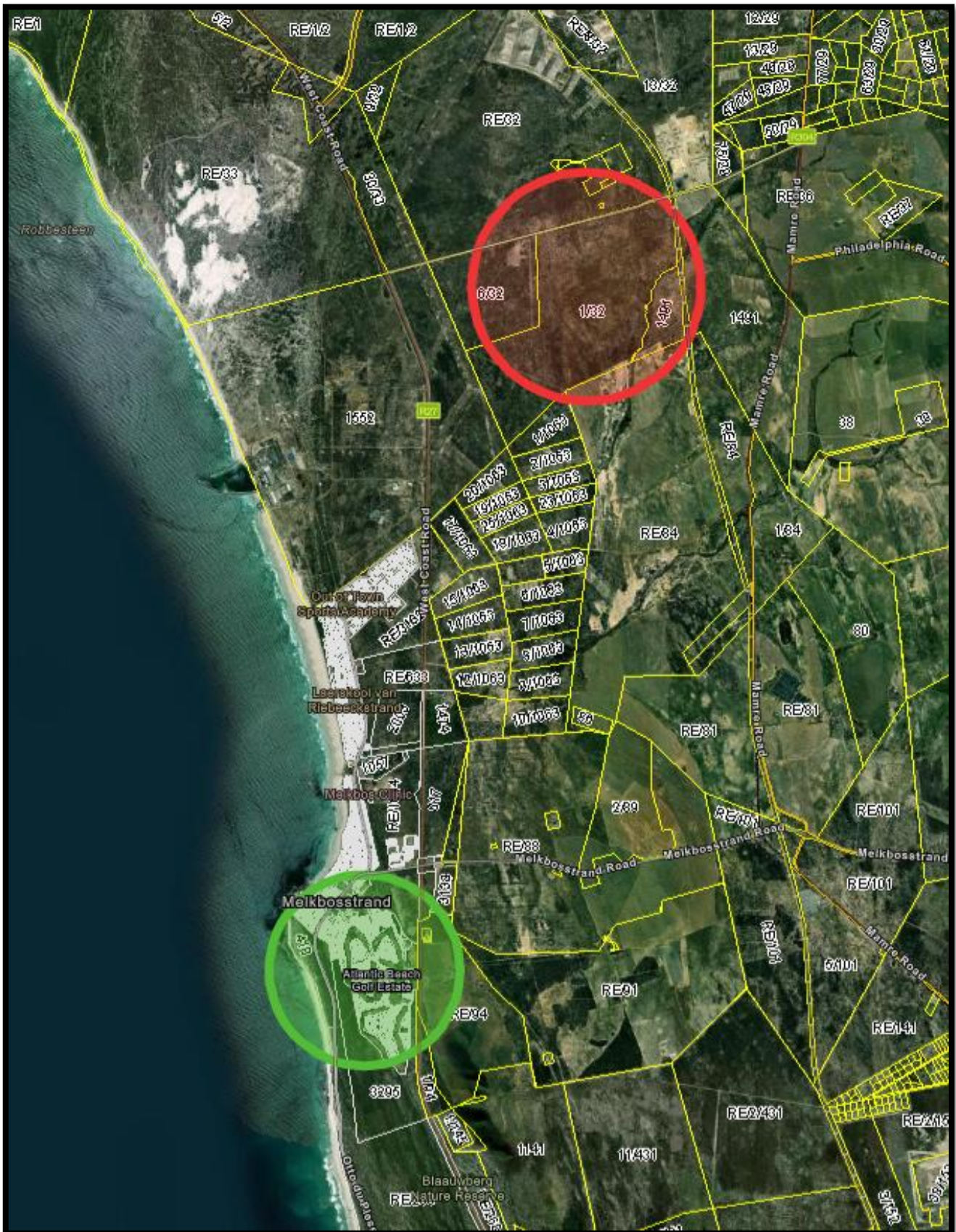


Figure 1: Location of Atlantic Beach (Green Circle) in Relation to WMF (Red Circle)

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 BOARD OF DIRECTORS: B Kaiser D Boyce, A Berning, G Herman, H Moolman

Key Grounds for Objection:

1. Impact of the WMF on the operations of the Koeberg Nuclear Power Station (KNPS) and its associated Emergency Evacuation Plan:

The importance of the functioning of the KNPS in the context of South Africa's ongoing energy crisis is well documented, as is the intention to extend its operations for the next 20 years. As South Africa's only nuclear power generation facility it is strictly regulated by national and international regulations and notably the National Nuclear Regulator, an independent government regulator of the nuclear industry, could revoke its operating license in the event that these regulations, which includes an Emergency Evacuation Plan, are not adhered to. (Atlantic Beach Homeowners are acutely aware of the current electricity shortages and many homeowners on the Estate have had to invest sizable amounts of money over the past few years to install solar panels and inverters for this reason.)

In the absence of any definitive comment from Eskom, the National Nuclear Regulator and the City of Cape Town confirming that the proposed operation of the WMF would not in any way impact on the operations and safety of the KNPS and the effectiveness of its associated Emergency Evacuation Plan, the ABHOA must object to the proposal. A key concern here is the traffic to be created by the WMF, including slow moving laden trucks and delivery vehicles and how this could undermine the ability of the surrounding road network to facilitate the required evacuation in terms of the KNPS Evacuation Plan. In addition to this the potential for the WMF facility to contain a high degree of flammable materials is a concern, given its proximity to the KNPS as well as the potential for regular fires in the area in the dry summer season.

Finally, the WMF facility is extensive in terms of size and operations and although it may not employ that many people on site, it will certainly attract more people to the area, given the regular deliveries of waste to be dropped off and processed as well as the deliveries of treated waste products from the site. All of this will occur on the border of the 5km UPZ (Urgent Protective Zone) within which no new development rights are permitted. The proximity of the site to the KNPS is thus a cause for concern.

2. Road Access and Traffic Impact Concerns:

Based on the DSR and discussions with the applicant's team at the Open Day, it is clear that the WMF is a sizable facility. For example, just examining the landfill component in isolation, the report states that WMF can accommodate in excess of 500 tonnes of waste a day. If the maximum load of a refuse truck is 26 tonnes, but often less is actually transported, then using a generous average load of 20 tonnes per truck, one could expect an additional 50 large truck trips per day (including return trips) on the surrounding road network, not to mention all the other trucks dropping off or collecting garden refuse and builder's rubble materials, as well as vehicles accessing the public drop facility.

The ABHOA has a real concern that were all this traffic to be directed along the R27, there could be a substantial negative traffic impact that could impact on its residents. The R27 is a high speed single bi-directional lane distributor that carries high volumes of traffic and that has been subject to many serious vehicle accidents over the years. Drivers are known to speed and dangerous overtaking is common place. Slow trucks particularly contribute to dangerous overtaking. While multiple access points onto the R27 exist, signalized intersections are few, all of which contributes to the potential for accidents.

Access to the WMF would be from the R27 onto a private farm road, that is currently not tarred (other than a small bellmouth at the intersection). It is assumed that much of the traffic heading to the WMF along the R27 would be north bound (coming from the greater Cape Metropole Area) and would be slow moving as it would be heavy laden. These vehicles would then have to brake and make a right turn into the farm road across the south bound lane on which traffic would be travelling at 120km/hr. This would surely create a high-risk accident situation. Another key concern could be loose material from trucks and bakkies, that has not been properly secured, falling into the roadway and causing damage to other vehicles or accidents. The fact that the site will be accepting hazardous waste and therefore there will be hazardous wastes transported via the R27, is an additional risk factor that must also be emphasized. (This has been in fact been identified as a risk on page 141 of the DSR.)

3. Rail Facilities:

The DSR refers to the location of the Atlantis goods railway line being a key reason for selecting the current site. At the Open Day it was acknowledged that the goods line is currently not operational due to land invasions in the Du Noon area. The ability of the rail link to provide any meaningful alternative to road-based transport to and from the WMF is doubtful, even in the medium term and therefore should not be relied on in the Traffic Impact Assessment report to discount the average projected number of road-based trips. It must be therefore assumed that all transport to and from the WMF will be road based. In addition to this, due to the general limited functioning of our rail infrastructure it is likely that most customers would not want to opt for rail-based transport in any event. The focus on selecting a site that offers a future possible rail link to the harbour does speak to the question as to whether the treatment of imported waste is possibly being considered as a possible business model option, which is also concerning.

4. Lack of firm Contract with the City of Cape Town:

The need for additional waste treatment facilities in the greater Cape Town region is acknowledged, but surely it is premature to proceed with the required applications for authorization without a firm contract with the City of Cape Town – surely the main client especially for the proposed landfill.

5. The site has already been purchased:

It is to some degree concerning that a large site like this has been acquired by a private company expressly for the purpose of operating a WMF, before the necessary application and authorization processes have been followed and concluded. It would have been more ideal to have made such a sale subject to a successful authorizations and not to have purchased the property beforehand – especially for such a large and high impact land use.

6. Concerning Track Record with Regards to Midrand Facility:

While the attention to environmental concerns and the proposed technical innovations seem very thorough, a number of Atlantic Beach homeowners have expressed the concern that the

companies acquired by Séché operated a waste facility in Midrand in Gauteng that resulted in negative environmental and health impacts for surrounding residents in that area. Certain homeowners in fact, formally lived in the Midrand area and experienced this first hand. They are extremely concerned that in spite of all assurances by the applicant and its French parent company, a repeat of those problems would again be experienced in this case.

7. Proximity to Residential Areas and Impact on Rural Character:

All of the above concerns and potential impacts are exacerbated by the close proximity of the site to the Atlantis and Melkbosstrand (which includes Atlantic Beach) local areas as well as to the surrounding small holdings. To locate an WMF of this scale and with this many potential waste streams and processes, so close to surrounding residential areas speaks to the underlying concern of the ABHOA that Cape Farm 32-1 is not the correct location for such a facility. In addition, although the site is located in close proximity to residential areas, it is also located beyond the urban edge in a largely rural context. The potential negative impact of the facility and its operations on that rural environment also needs to be carefully considered.

CONCLUSION

The ABHOA appreciates the need for additional waste treatment/management facilities to accommodate the growth of the greater Cape Town area. It also appreciates being granted I&AP status for this WMF process, the sharing of information by the applicant and the opportunity to comment at this stage. Our prevailing concern is that Cape Farm 32-1 is simply the wrong location for an WMF of this scale and potential impact and therefore we must respectfully tender our objection.

Yours faithfully,



Francois Swart

Atlantic Beach Chief Executive Officer



David Bettesworth

Bettesworth Scott Urban Planners