



ATLANTIC BEACH

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7700

24 June 2024

To Whom It May Concern

**COMMENT ON WESCO WASTE MANAGEMENT FACILITY DRAFT SCOPING REPORT: REV 1:
DATED 21 MAY 2024**

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.

Reference is made to our objection letter in relation to the Pre-Application Draft Scoping Report, dated 24 April 2024.

Thank you for recording our objections and comments as set out in our 24 April letter, in your Appendix C.9 (the Pre-Application Comments and Responses Report) to the DSR.

With respect to Appendix C.9, the summary of our 24 April letter does not reflect our objection letter introductory note (see note below), and it is of importance to us that this be formally noted as a concern in the DSR:

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

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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.

Furtherto the above, we have studied the relevant sections of the (updated DSR) and the relevant sections of the associated Appendix C.9 Pre-Application Comments and Responses Report. Notwithstanding the responses made to our comments and the associated updates in the DSR, the objections and concerns raised in our 24 April 2024 letter are sustained.

However the following additional comments are made below to the responses received and updates made to the DSR, using the numbering system from our 24 April letter:

Key Grounds for Objection in 24 April letter:

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

Thank you for accurately capturing this objection in your C.9 Appendix. Your response confirming that the necessary MPBL application will be made, namely to request City approval to permit the facility within the 5-16km UPZ is noted and appreciated. However in this instance, simply securing MPBL approval is not sufficient, as such applications normally only involve City Departments such as Development Management, Transport and Disaster Risk Management – formal comment must be obtained from Eskom and the NNR as well. The facility is simply too large and too close to the KNPS, for the input of Eskom and the NNR not to be required.

2. Road Access and Traffic Impact Concerns:

Thank you for accurately capturing this objection in your C.9 Appendix. The proposed potential issues to be scoped as set out in Ch. 7 and the proposed specialist studies and terms of reference as out in Ch. 8 of the DSR, in order to address the concerns we have raised, are supported.

3. Rail Facilities:

Thank you for accurately capturing this objection in your C.9 Appendix and for confirming that the TIA will examine the potential for traffic impacts of waste delivery to the Wesco WMF (with and without waste-by-rail as a delivery method).

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

Thank you for accurately capturing this concern in your C.9 Appendix and your response is noted. Clarity as to whether only local vs. imported waste will be processed at the facility is still requested, especially given your following comment to the City under Item 121.40 on pg 140 of the Appendix: *It is envisaged that the majority of waste to be managed would be from South Africa and principally generated within the CoCT. Any import of waste would comply with the provisions of the Basel Convention.*

5. The site has already been purchased:

Thank you for accurately capturing this concern in your C.9 Appendix and your response thereto is noted.

6. Concerning Track Record with Regards to Midrand Facility:

Thank you for accurately capturing this concern in your C.9 Appendix and your response thereto is noted. However your response simply states that these concerns “are noted”. The Midrand operation is of big concern to some of our homeowners and therefore we reiterate our request for a formal response to be made to these concerns in the ESIA.

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

Thank you for accurately capturing this concern in your C.9 Appendix and your response thereto is noted.

Additional Comments on the DSR:

Should Section 7.2: Public Concerns, not have been updated to include the comments/objections raised and recorded in Appendix C.9?

We again thank you for the opportunity to comment on this matter, and look forward to receiving the draft ESIA report from you in due course for further comment.

Yours faithfully,



Francois Swart

Atlantic Beach Chief Executive Officer



David Bettesworth

Bettesworth Scott Urban Planners