



**REFERENCE:** 16/3/3/1/A5/21/2016/20  
**ENQUIRIES:** Natasha Bieding  
**DATE OF ISSUE:** 18 SEPTEMBER 2020

## ENVIRONMENTAL AUTHORISATION

### APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED): PROPOSED INSTALLATION OF ADDITIONAL DIESEL STORAGE FACILITIES AND GENERATORS ON ERF 48 (PORTION OF ERF 34) ATLANTIC HILLS, DURBANVILLE HILLS

With reference to your application for the abovementioned, find below the outcome with respect to this application.

#### DECISION

By virtue of the powers conferred on it by the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended), the Competent Authority herewith **grants Environmental Authorisation** to the applicant to undertake the listed activities specified in section B below with respect to the Preferred Alternative, described in the Basic Assessment Report ("BAR"), dated 26 August 2020.

The applicant for this Environmental Authorisation is required to comply with the conditions set out in Section E below.

#### A. DETAILS OF THE APPLICANT FOR THIS ENVIRONMENTAL AUTHORISATION

Amazon Data Services South Africa Pty (Ltd) (ADS)  
c/o Sudeshen Chetty  
Wembley Square 2  
134 Sloan Street  
CAPE TOWN  
8001

Tel.: (021) 467 0154  
Email: [Sudesc@amazon.com](mailto:Sudesc@amazon.com)

The abovementioned applicant is the holder of this Environmental Authorisation and is hereinafter referred to as "**the holder**".

**B. LIST OF ACTIVITIES AUTHORISED**

<b>Listed Activities</b>	<b>Activity/Project Description</b>
<p>Listing Notice 1 of the EIA Regulations, 2014 (as amended)–</p> <p>Activity Number: 37            Activity Description: <i>“The expansion and related operation of facilities for the generation of electricity from a non-renewable resource where—</i>  <i>(i) the electricity output will be increased by 10 megawatts or more, excluding where such expansion takes place on the original development footprint; or</i>  <i>(ii) regardless the increased output of the facility, the development footprint will be expanded by 1 hectare or more”.</i></p>	<p>Additional generators will be installed that will increase electricity output by 12 megawatts.</p>
<p>Listing Notice 1 of the EIA Regulations, 2014 (as amended)-            Activity Number: 51            Activity Description: <i>“The expansion and related operation of facilities for the storage, or storage and handling, of a dangerous good, where the capacity of such storage facility will be expanded by more than 80 cubic metres”.</i></p>	<p>Additional diesel storage tanks will be installed that will increase the storage capacity by 111 cubic metres.</p>
<p>Listing Notice 1 of the EIA Regulations, 2014 (as amended) -            Activity Number: 67            Activity Description: <i>“The Phased activities for all activities—</i>  <i>(i) listed in this Notice, which commenced on or after the effective date of this Notice or similarly listed in any of the previous NEMA notices, which commenced on or after the effective date of such previous NEMA Notices;</i></p> <p><i>excluding the following activities listed in this Notice-</i>            17(i)(a-d);            17(ii)(a-d);            17(iii)(a-d);            17(iv)(a-d);            17(v)(a-d);            20;            21;            22;            24(i);            29;            30;            31;            32;            34;            54(i)(a-d);            54(ii)(a-d);            54(iii)(a-d);</p>	<p>The existing facility's current diesel storage (77m<sup>3</sup>) and the back-up generators (7.2 MW) fell below the thresholds of listed activities in Listing Notice 1, however the proposed expansion will exceed these thresholds.</p>

<p>54(iv)(a-d);  54(v)(a-d);  55;  61;  64; and  65; or  (ii) listed as activities 5, 7, 8(ii), 11, 13, 16, 27(i) or 27(ii) in Listing Notice 2 of 2014 or similarly listed in any of the previous NEMA notices, which commenced on or after the effective date of such previous NEMA Notices;</p> <p>where any phase of the activity was below a threshold but where a combination of the phases, including expansions or extensions, will exceed a specified threshold".</p>	
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The abovementioned list is hereinafter referred to as "**the listed activities**".

The holder is herein authorised to undertake the following alternative that includes the listed activities relating to the development:

The proposed development entails the installation of additional diesel storage tanks and back-up generators at an existing data storage facility, as follows:

- installation of five (5) additional back-up diesel generators, each with a generation capacity of approximately 2.4 megawatt ("MW") each. The facility will therefore have a total of 8 generators with a combined capacity of 19.2 MW; and
- installation of above-ground diesel tanks with a storage capacity of approximately 111 m³ collectively. The total diesel storage at the facility will therefore amount to approximately 188m³.

The following fuel storage design specifications and standards will also be implemented:

- storage tanks will be constructed of weather proof materials;
- bunding will be installed at 110% of the volume of the storage tanks;
- leak detection technology will be installed to notify staff of leaks immediately; and
- overflow prevention valves will be installed within the tanks to prevent overfilling.

The expansion footprint will amount to approximately 500m².

Access to the facility will be gained via an existing access road.

### C. SITE DESCRIPTION AND LOCATION

The listed activities will be undertaken on Erf 48 (Portion of Erf 34) on Atlantic Drive, Atlantic Hills, which is located approximately 14 km west from Durbanville and north of the N7 off-ramp which leads up to Potsdam Road.

Coordinates of Erf 48 (Portion of Erf 34), Durbanville:

18° 48' 55.48" South, 33° 48' 49.78" East

The SG digit code:

Erf 48 (Portion of Erf 34)	C01600850000004800000
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Refer to Annexure 1: Locality Plan

The above is hereinafter referred to as "**the site**".

#### **D. DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER**

AECOM SA (Pty) Ltd  
c/o Ms. Phindile Mashau/ Tamryn Johnson  
263A West Avenue  
Centurion  
TSHWANE  
0157

Tel.: (021) 421 3894  
Email: Phindile.Mashau@aecom.com

#### **E. CONDITIONS OF AUTHORISATION**

##### **Scope of authorisation**

1. The holder is authorised to undertake the listed activities specified in Section B above in accordance with and restricted to the preferred alternative, described in the BAR dated 26 August 2020 on the site as described in Section C above.
2. Authorisation for the activities is subject to compliance with the conditions set out in this Environmental Authorisation. The holder must ensure compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the holder.
3. The holder must commence with, and conclude, the listed activities within the stipulated validity period which this Environmental Authorisation is granted for, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority.  
This Environmental Authorisation is granted for–
  - (a) A period of five (**5**) years, from the date of issue, during which period the holder must commence with the authorised listed activities; and
  - (b) A period of ten (**10**) years, from the date the holder commenced with the authorised listed activities, during which period the authorised listed activities for the construction phase, must be concluded.
4. The activities that have been authorised must only be carried out at the site described in Section C above in terms of the approved "Environmental Management Programme" ("EMPr").
5. Any changes to, or deviations from the scope of the description set out in Section B and Condition 2 above must be approved, in writing, by the competent authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the competent authority may request such information to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.

##### **Notification of authorisation and right to appeal**

6. The holder of the authorisation must in writing, within 14 (fourteen) calendar days of the date of this decision –

- 6.1 notify all registered Interested and Affected Parties of –
  - 6.1.1 the outcome of the application;
  - 6.1.2 the reasons for the decision;
  - 6.1.3 the date of the decision; and
  - 6.1.4 the date of issue of the decision;
- 6.2 draw the attention of all registered Interested and Affected Parties to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended);
- 6.3 draw the attention of all registered Interested and Affected Parties to the manner in which they may access the decision; and
- 6.4 provide the registered Interested and Affected Parties with:
  - 6.4.1 the name of the holder (entity) of this Environmental Authorisation,
  - 6.4.2 name of the responsible person for this Environmental Authorisation,
  - 6.4.3 postal address of the holder,
  - 6.4.4 telephonic and fax details of the holder,
  - 6.4.5 e-mail address, if any;
  - 6.4.6 the contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered Interested and Affected Parties in the event that an appeal is lodged in terms of the National Appeal Regulations, 2014 (as amended).

### **Commencement**

7. The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the applicant notified the registered Interested and Affected Parties of this decision.
8. In the event that an appeal is lodged with the Appeal Administrator, the effect of this Environmental Authorisation is suspended until such time as the appeal is decided. In the instance where an appeal is lodged the holder may not commence with the activity, including site preparation, until such time as the appeal has been finalised and the holder is authorised to do so.

### **Written notice to the competent authority**

9. A written notice of seven calendar days' notice must be given to the competent authority before commencement of construction activities. Commencement for the purpose of this condition includes site preparation.
  - 9.1 The notice must make clear reference to the site details and EIA Reference number given above.
  - 9.2 The notice must also include proof of compliance with the following conditions described herein:

Conditions: 6, 7, 10.1, 10.2.1, 14, 25.1. and 25.2.

### **Management of activity**

10. The EMPr submitted, as dated September 2020 is hereby approved on condition that the following amendments are made and must be implemented.
  - 10.1 The Data Center Safety Emergency Response Plan as included in the EMPr dated 2 September 2020 must be submitted for comment to the City of Cape Town, prior to the undertaking of the authorised activities. A copy of the Emergency Response Plan

and the letter of comment from the City of Cape Town must be submitted to this Department for information purposes.

- 10.1.1 Should any amendments to the Data Center Emergency Response Plan be requested in the City of Cape Town's comment, the Emergency Response Plan must be amended and the updated Emergency Response Plan must be included in the EMPr.
- 10.2 The Integrated Waste Management Plan ("IWMP") dated 17 July 2020, as submitted together with the Final BAR, must be included in the EMPr.
  - 10.2.1 The IWMP must be submitted for comment to the City of Cape Town prior to the undertaking of the authorised activities. The letter of comment on the IWMP from the City of Cape Town must be submitted to this Department for information purposes.
  - 10.2.2 Should any amendments to the IWMP be requested in comments from the City of Cape Town, the IWMP must be amended accordingly and the updated IWMP must be included in the EMPr.
11. An application for amendment to the EMPr must be submitted to the competent authority in terms of Chapter 5 of the EIA Regulations, 2014 (as amended) if any amendments are to be made to the outcomes of the EMPr, and these may only be implemented once the amended EMPr has been authorised by the competent authority.
12. The EMPr must be included in all contract documentation for all phases of implementation.
13. A copy of the Environmental Authorisation and the EMPr must be kept at the site where the listed activities will be undertaken. Access to the site referred to in Section C above must be granted and, the Environmental Authorisation and EMPr must be produced to any authorised official representing the competent authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein. The Environmental Authorisation and EMPr must be made available for inspection by any employee or agent of the applicant who works or undertakes work at the site.

### **Monitoring**

14. The holder must appoint a suitably experienced Environment Control Officer ("ECO"), for the duration of the construction and rehabilitation phases of implementation.

The ECO must–

  - 14.1 be appointed prior to commencement of any land clearing or construction activities commencing;
  - 14.2 ensure compliance with the EMPr and the conditions contained herein; and
  - 14.3 keep record of all activities on site; problems identified; transgressions noted and a task schedule of tasks undertaken by the ECO.

### **Environmental audit reports**

15. The holder must, for the period during which the Environmental Authorisation and EMPr remain valid -
  - 15.1 ensure that the compliance with the conditions of the Environmental Authorisation and the EMPr is audited;
  - 15.2 submit at least two environmental audit reports to the relevant competent authority during the construction phase. The holder must submit one audit report within three (3) months after commencement of the construction phase and another audit report within six (6) months after completion of the construction period; and

- 15.3 submit an environmental audit report every five (5) years after the commencement of the operational phase.
16. The environmental audit report must be prepared by an independent person and must address the objectives and contain all the information set out in Appendix 7 of the EIA Regulations, 2014 (as amended).
- In addition to the above, the environmental audit report, must -
- 16.1 provide verifiable findings, in a structured and systematic manner, on-
    - (a) the level of compliance with the conditions of the Environmental Authorisation and the EMPr and whether this is sufficient or not; and
    - (b) the extent to which the avoidance, management and mitigation measures provided for in the EMPr achieve the objectives and outcomes of the EMPr and highlight whether this is sufficient or not;
  - 16.2 identify and assess any new impacts and risks as a result of undertaking the activity;
  - 16.3 evaluate the effectiveness of the EMPr;
  - 16.4 identify shortcomings in the EMPr;
  - 16.5 identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr;
  - 16.6 indicate the date on which the construction work was commenced with and completed or in the case where the development is incomplete, the progress of the development and rehabilitation;
  - 16.7 include a photographic record of the site applicable to the audit; and
  - 16.8 be informed by the ECO reports.
17. The holder must, within 7 (seven) calendar days of the submission of the environmental audit report to the competent authority, notify all potential and registered Interested and Affected Parties of the submission and make the report available to anyone on request and, where the holder has such a facility, be placed on a publicly accessible website.
18. The generators must be maintained on a regular basis to ensure that generators are working optimally.
19. All the diesel storage tanks must be bunded at 110% of the volume of the storage tanks.
20. All diesel storage tanks must comply with the relevant South African National Standards ("SANS") codes.
21. All noise generating equipment must be properly maintained to minimise potential noise impacts during the operational phase.
22. Standardised noise measurements must be made on individual equipment and regular checks carried out to help ensure that equipment is not deteriorating and to detect increases which could lead to increase in the noise impact over-time.
23. Environmental noise monitoring must be carried out annually to detect deviations from predicted noise levels and enable corrective measures to be taken where warranted.
24. A follow-up assessment must be conducted within a month after the new generators are installed and fully operational in order to verify the combined noise rating levels and to ensure that generators operate at the levels indicated from the supplier specifications. A copy of the follow-up assessment must be submitted to this Department for consideration.

### **Specific conditions**

25. The following mitigation measures as included in the Final BAR dated 17 December 2019 compiled by Tamryn Johnson AECOM SA (Pty) Ltd must be implemented:

- 25.1. A Major Hazard Installation Assessment and Prevention Plan must be compiled and submitted for comment to the City of Cape Town, prior to the undertaking of the authorised activities. A copy of the Major Hazard Installation assessment and Prevention Plan and the letter of comment from the City of Cape Town must be submitted to this Department for consideration.
- 25.2. A site-specific Leak Detection and Repair Programme ("LDAR") must be compiled and submitted for comment to the City of Cape Town prior to the undertaking of the authorised activities. A copy of the LDAR Programme and the letter of comment from the City of Cape Town must be submitted to this Department for consideration.
26. Surface and ground water must not be polluted due to any actions on the site. The applicable requirements with respect to relevant legislation pertaining to water must be met.
27. An integrated waste management approach, which is based on waste minimisation and incorporates reduction, recycling, re-use and disposal, where appropriate, must be employed. Any solid waste must be disposed of at a waste disposal facility licensed in terms of the applicable legislation.
28. Should any heritage remains be exposed during excavations or any actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape (in accordance with the applicable legislation). Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains include: archaeological remains (including fossil bones and fossil shells); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features; rock art and rock engravings and graves or unmarked human burials.

A qualified archaeologist must be contracted where necessary (at the expense of the applicant and in consultation with the relevant authority) to remove any human remains in accordance with the requirements of the relevant authority.

## **F. GENERAL MATTERS**

1. Notwithstanding this Environmental Authorisation, the holder must comply with any other statutory requirements that may be applicable when undertaking the listed activities.
2. If the holder does not commence with the listed activities within the period referred to in Condition 3, this Environmental Authorisation shall lapse for the activities, and a new application for Environmental Authorisation must be submitted to the competent authority. If the holder wishes to extend the validity period of the Environmental Authorisation, an application for amendment in this regard must be made to the competent authority prior to the expiry date of the Environmental Authorisation.
3. The holder must submit an application for amendment of the Environmental Authorisation to the competent authority where any detail with respect to the Environmental Authorisation must be amended, added, substituted, corrected, removed or updated. If a new holder is proposed, an application for amendment in terms of Part 1 of the EIA Regulations, 2014 (as amended) must be submitted.
  - 3.1. Please note that an amendment is not required if there is a change in the contact details of the holder. In this case, the competent authority must only be notified of such changes.
4. The manner and frequency for updating the EMPr is as follows:
  - 4.1. Amendments to the EMPr, other than those mentioned above, must be made in accordance with Regulations 35 to 37 of the EIA Regulations, 2014 (as amended) or any relevant legislation that may be applicable at the time.



5. Non-compliance with any condition of this Environmental Authorisation or EMPr may render the holder liable to criminal prosecution.

## G. APPEALS

Appeals must comply with the provisions contained in the National Appeal Regulations, 2014 (as amended).

1. An appellant (if the holder of the decision) must, within 20 (twenty) calendar days from the date notification of the decision was sent to the holder by the competent authority -

Submit an appeal in accordance with Regulation 4 of the National Appeal Regulations, 2014 (as amended) to the Appeal Administrator; and

Submit a copy of the appeal to any registered Interested and Affected Parties, any Organ of State with interest in the matter and the decision-maker *i.e.*, the competent authority that issued the decision.

2. An appellant (if NOT the holder of the decision) must, within 20 (twenty) calendar days from the date the holder of the decision sent notification of the decision to the registered Interested and Affected Parties -

2.1 Submit an appeal in accordance with Regulation 4 of the National Appeal Regulations, 2014 (as amended) to the Appeal Administrator; and

2.2 Submit a copy of the appeal to the holder of the decision, any registered Interested and Affected Party, any Organ of State with interest in the matter and the decision-maker *i.e.*, the competent authority that issued the decision.

3. The holder of the decision (if not the appellant), the decision-maker that issued the decision, the registered Interested and Affected Party and the Organ of State must submit their responding statements, if any, to the appeal authority and the appellant within 20 (twenty) calendar days from the date of receipt of the appeal submission.

4. The appeal and the responding statement must be submitted to the address listed below:

By post:                    Attention: Marius Venter  
Western Cape Ministry of Local Government, Environmental Affairs and  
Development Planning  
Private Bag X9186  
CAPE TOWN  
8000

By facsimile:            (021) 483 4174; or

By hand:                    Attention: Mr Marius Venter (Tel.: 021 483 3721)  
Room 809  
8<sup>th</sup> Floor Utilitas Building, 1 Dorp Street, Cape Town, 8001

Note: For purposes of electronic database management, you are requested to submit electronic copies (Microsoft Word format) of the appeal, responding statement and any supporting documents to the Appeal Authority to the address listed above and/ or via e-mail to [DEADP.Appeals@westerncape.gov.za](mailto:DEADP.Appeals@westerncape.gov.za).

5. A prescribed appeal form as well as assistance regarding the appeal processes is obtainable from the Appeal Authority at: Tel. (021) 483 3721, E-mail [DEADP.Appeals@westerncape.gov.za](mailto:DEADP.Appeals@westerncape.gov.za) or URL <http://www.westerncape.gov.za/eadp>.

## H. DISCLAIMER

The Western Cape Government, the Local Authority, committees or any other public authority or organisation appointed in terms of the conditions of this environmental authorisation shall not be responsible for any damages or losses suffered by the holder, developer or his/her successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.

Your interest in the future of our environment is appreciated.

Yours faithfully



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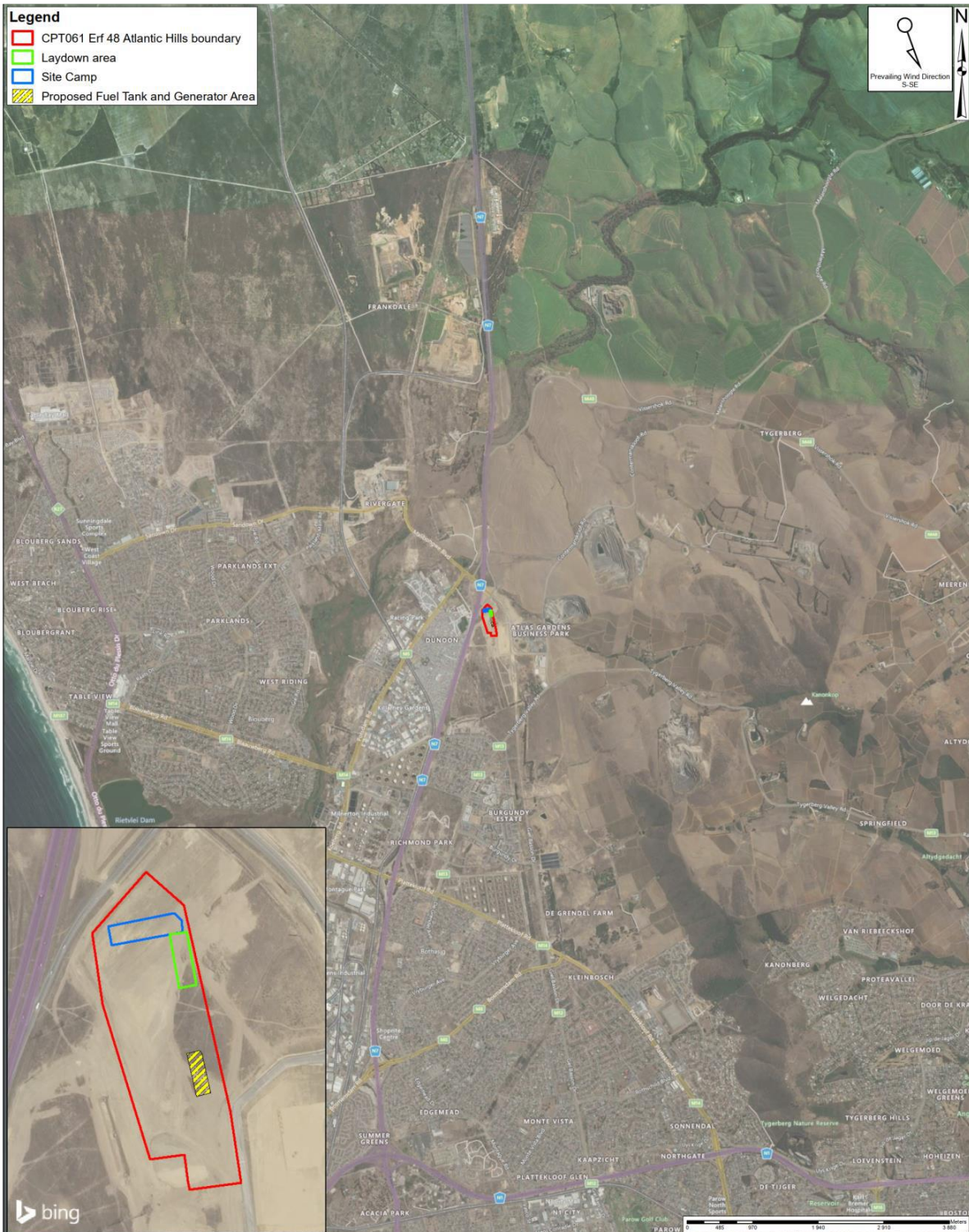
**MR ZAAHIR TOEFY**  
**DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)**

**DATE OF DECISION: 18 SEPTEMBER 2020**

Copied to: (1) T Manzoni Johnson (AECOM (Pty) Ltd)  
(2) P Mashau (AECOM (Pty) Ltd)  
(3) P Titmuss (City of Cape Town)

Email: manzoniconsult@gmail.com  
Email: Phindile.Mashau@aecom.com  
Email: Pat.Titmuss@capetown.gov.za

# ANNEXURE 1: LOCALITY MAP



Project Title:	<b>Installation of Fuel Storage Facilities and Back-up Generators</b>	Scale 1:50 000 <small>(When page size is A3 portrait)</small>	<b>Figure 1</b>
Map Title:	<b>Locality Map</b>	Projection: Transverse Mercator Datum: Hartbeesthoek 1994 Central Meridian: 19.0 GA: Maree	Sources: © 2020 Microsoft Corporation © 2020 DigitalGlobe © CNES (2020) Distribution Airbus DS © 2020 HERE
<small>Whilst every care has been taken in compiling the information on this map, AECOM cannot accept responsibility for any inaccuracies. © Copyright</small>		Approved By: P. Mashau Date Saved: 2020/04/15 Project Number: 60614153 Map Ref: LocalityMapRev1.mxd Revision: 00	
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## ANNEXURE 3: REASONS FOR THE DECISION

In reaching its decision, the Competent Authority considered, *inter alia*, the following:

- a) The information contained in the Application Form dated 18 May 202, the EMPr submitted together with the BAR on 26 August 2020 and the additional information received on 15 September 2020 and 17 September 2020;
- b) Relevant information contained in the Departmental information base, including the Guidelines on Public Participation, Alternatives (dated March 2013);
- c) The objectives and requirements of relevant legislation, policies and guidelines, including section 2 of the NEMA; and
- d) The comments received from Interested and Affected Parties and responses to these, included in the BAR dated 26 August 2020.

All information presented to the Competent Authority was taken into account in the consideration of the application for Environmental Authorisation. A summary of the issues that were considered to be the most significant for the decision is set out below.

### 1. Public Participation

The public participation process included:

- identification of and engagement with Interested and Affected Parties;
- distribution of letters to Interested and Affected Parties on 12 June 2020 and 2 July 2020;
- fixing a notice board at the site where the listed activities are to be undertaken on 15 June 2020;
- a notification phone call was made to the ward councillor on 20 May 2020 to ascertain preferred methods of conducting Public Participation.
- giving written notice to the owners and occupiers of land adjacent to the site where the listed activities are to be undertaken, the municipality and ward councillor, and the various organs of state having jurisdiction in respect of any aspect of the listed activities;
- the placing of a newspaper advertisements in the "Tygerburger" on 4 March 2020 and 17 June 2020; and
- making a Background Information Document, Draft BAR and all relevant information available to Interested and Affected Parties for public review and comment on 12 June 2020.

This Department is satisfied that the Public Participation Process that was followed met the minimum legal requirements. All the comments and responses made were included in the reports.

### 2. Alternatives

#### Activity Alternative 1 (Preferred and herewith authorised)

Activity Alternative 1 entails the installation of:

- five (5) additional back-up diesel generators, each with a generation capacity of approximately 2.4 MW; and
- additional of above-ground diesel tanks with a storage capacity of approximately 111 m<sup>3</sup> collectively.

#### Activity Alternative 2

Activity Alternative 2 entails the installation of facilities to obtain energy from renewable sources such as wind and solar.

Activity Alternative 1 is preferred and Activity Alternative 2 was rejected as the power, which is obtained from renewable sources is not regarded as feasible from an economic, environmental or technical perspective for this project. The use of back-up diesel generators is deemed to be more

appropriate in order to meet the needs for large installations, battery storage and a guaranteed availability of power, as required.

#### Fuel Storage Design Alternative (Preferred and herewith authorised)

This alternative incorporates the following industry standards, which are applicable to the safe storage of fuel:

- storage tanks will be constructed of weather proof materials to prevent weathering;
- bunding will be installed at 110% of the volume of the storage tank in order to contain sudden leakage;
- leak detection technology will be installed to notify staff of leaks immediately;
- overflow prevention valves will be installed within the tanks to prevent overfilling; and
- fuel consumption will be optimised during back-up operations.

This Fuel Storage Design Alternative is preferred as it incorporates the necessary industry standards and specifications that will ensure that negative impacts such as accidental leaks and pollution are minimized.

#### Design Alternative for the generators (Preferred and herewith authorised)

This alternative entails the design of the proposed generators so that it conforms to the applicable design specifications in terms of ISO 8528, which for this reason is also preferred.

#### Operational Alternative (Preferred and herewith authorised)

This alternative entails the installation of the additional diesel storage and the generators, as proposed, which is preferred for the purpose of providing energy relief in the event when there is a loss or interruption of the municipal power supply.

#### "No-Go" Alternative

The "no-go" alternative entails maintaining the "status quo", i.e. not installing the diesel storage tanks and back-up energy generators.

This alternative was rejected, as it means that insufficient energy capacity will exist and thereby compromise the ability of the facility to continue providing service when power outages occur.

### **3. Impact Assessment and Mitigation measures**

#### 3.1 Activity need and desirability

The existing facility provides a range of services related to internet and data provision as well as increasing connectivity through technology. The proposed expansion of the backup energy centre is required to help ensure a continuous power supply in the event of power outages so that the facility can continue to render the abovementioned services to customers.

#### 3.2 Regional/ planning context

The site is zoned General Industrial I and the proposed expansion is permitted in terms of the property's existing land use rights. The proposed development will support economic enterprise in the applicable developing industrial node by allowing business to continue to function during outages and/or load shedding and therefore contribute towards the broader goals of sustaining productivity and employment. The proposed expansion of bulk diesel storage and generators supports the strategic goal of transforming Cape Town into a digitally and technologically efficient city.

#### 3.3 Biophysical Impacts

All proposed installation work will take place at the existing Data Centre, located within the transformed Atlantic Hills Business Park.

The site is completely transformed by the existing business park and largely occupied by buildings, with paved open spaces used as parking facilities. No vegetation exists on the proposed site. Further, no watercourses are located on the site.

The risk of pollution caused by uncontrolled runoff from the construction site and/or accidental leaking or spillage from hazardous material exists. However, the installation of the diesel storage tanks above ground, largely eliminates the possibility of an underground leak or spill. Furthermore, the implementation of the spillage mitigation and prevention measures as contained in the EMPr, LDAR and the Data Center Safety Emergency Response Plan will make any accidental spillage into the receiving area/environment low to extremely unlikely.

#### 3.4 Health and Safety

In order to reduce the risk associated with *inter alia*, accidental fires, explosions and spillages, an Emergency Response Plan has been compiled and included in the EMPr. A MHI risk assessment has been undertaken by RISCOM (PTY) Ltd. The MHI Assessment and Prevention Plan will be submitted to the City of Cape Town for their comment, prior to the commencement of the authorised activities. The implementation of the Emergency Response Plan and the EMPr will minimise the risk of emergency situations such as accidental fires.

#### 3.5 Noise and Emissions

The new generators and additional diesel storage tanks will only be used in the event of a power outage, as opposed to being in continuous operation. During such events, the generators will produce noise and exhaust emissions. Since, it is unlikely that the proposed additional generators will operate for extended periods of time or on a regular basis, noise and exhaust emissions are unlikely to significantly impact on the health of employees at the facility, the people in the Business Park or the people who reside in the surrounding residential areas (located approximately 260 m from the site). Furthermore, the generators do not emit emissions in excess of the limits prescribed by the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 1998) (NEM:AQA) listed activities. Potential minor gas emissions may be released from fuel tank vents during tank refilling, and emissions from generators.

The proposed development will be situated within an existing Business Park for which it was determined that the Park and its associated activities will generate noise levels which will be within the allowable limit of 70 A-weighted decibels ("dB(A)") during the operational phase. Noise during the construction phase will be limited as the diesel storage facilities and generators will be installed on the site with minimal construction related activities. However, in order to mitigate noise during the construction phase, measures have been included in the EMPr and will be implemented. Further, conditions of authorisation have been included in this environmental authorisation to minimise noise impacts during the operational phase.

#### 3.5 Visual / sense of place

During the construction period, there will be limited construction activities, which may result in visual impacts. These will however be short-term and be adequately managed by the implementation of the EMPr.

The expansion will occur within an existing business park where the surroundings comprise large mixed-use industrial and commercial properties. Since the proposed development comprises the expansion of an existing facility, visual impacts during the operational phase will be of low negative significance.

#### 3.6 Heritage / archaeological / built environment

The impact of the proposed development on heritage is low, and the likelihood of material being found during earthworks is also low as the proposed expansion works will take place in an existing transformed and business park.

#### 3.7 Socio-economic

The proposed development will allow the existing facility to continue to provide services to clients even during power outages. This has economic benefits for both the facility as well as their clients using the specific services. It is further projected that having uninterrupted power supply during power outages will help to sustain existing employment while additional employment opportunities will also be generated by the proposed expansion activities.

#### 4. National Environmental Management Act Principles

The National Environmental Management Principles (set out in section 2 of the NEMA, which apply to the actions of all organs of state, serve as guidelines by reference to which any organ of state must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment), *inter alia*, provides for:

- the effects of decisions on all aspects of the environment to be taken into account;
- the consideration, assessment and evaluation of the social, economic and environmental impacts of activities (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment;
- the co-ordination and harmonisation of policies, legislation and actions relating to the environment;
- the resolving of actual or potential conflicts of interest between organs of state through conflict resolution procedures; and
- the selection of the best practicable environmental option.

Negative impact

- Health and Safety risks associated with accidental fires and spillages; and
- Noise and emissions

Positive impact

The data storage facility comprises a centralised computer server system which will offer significant advantages, including:

- significant reduction in energy consumption;
- higher reliability and redundancy of systems;
- 24/7 monitoring and maintenance of storage by staff;
- higher security and data protection; and
- flexibility, *i.e.* ability to increase or decrease storage requirements at short notice in line with specific business needs.

#### 5. Conclusion

In view of the above, the NEMA principles, compliance with the conditions stipulated in this Environmental Authorisation, and compliance with the EMPr, the Competent Authority is satisfied that the proposed listed activities will not conflict with the general objectives of integrated environmental management stipulated in Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) and that any potentially detrimental environmental impacts resulting from the listed activities can be mitigated to acceptable levels.

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