



CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD

Case ID 1500164932

**Erf 21594, 13 Kiaat Road,
Kraaifontein Industria, Kraaifontein**

Development Management

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REZONING ERF 21594 KRAAIFONTEIN

Client:

Applicant: First Plan Town Planners

Reference: FP/0326/1171

Date: June 2026



- **APPLICATION FOR THE REZONING OF THE ERF 21594 FROM GENERAL INDUSTRIAL ZONE 2 TO RISK INDUSTRY IN TERMS OF SECTION 42 (a) OF THE CAPE TOWN MUNICIPAL PLANNING BY-LAW.**
- **APPLICATION FOR THE APPROVAL OF THE SITE DEVELOPMENT PLAN No. FP/0326/1171/SDP FOR ERF 21594 KRAAIFONTEIN IN TERMS OF SECTION 42(i) OF THE CAPE TOWN MUNICIPAL PLANNING BY-LAW.**
- **APPLICATION FOR A PERMANENT DEPARTURE IN TERMS OF SECTION 42(b) OF THE CAPE TOWN MUNICIPAL PLANNING BYLAW TO PERMIT THE RELAXATION OF THE NORTHERN COMMON (SIDE) BUILDING LINE FROM 5m TO 1,969m AND A PORTION OF THE WESTERN COMMON (REAR) BUILDING LINE FROM 5m TO 2,515m TO ACCOMMODATE THE EXISTING BUILDING ON THE PREMISES.**
- **APPLICATION IN TERMS OF SECTION 42(b): (DEPARTURE) TO PERMIT A 8,29m AND A 8,405m CARRIAGE WAY CROSSING IN LIEU OF 8M MAXIMUM IN TERMS OF ITEM 140(2) C OF THE CAPE TOWN MUNICIPAL PLANNING BYLAW.**
- **APPLICATION IN TERMS OF SECTION 42(b): (DEPARTURE) TO PERMIT 7 VEHICLES TO PARK AT 90° TO THE STREET AND LEAVE THE SITE BY REVERSING OVER THE SIDEWALK IN TERMS OF ITEM 141(1)B OF THE CAPE TOWN MUNICIPAL PLANNING BYLAW.**

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SECTION A

EXECUTIVE SUMMARY

1. SUMMARY OF PROPERTY DETAIL.

Property description	Erf 21594 Kraaifontein.
Property address	13 Kiaat Street Kraaifontein Industrial
Application components/description	• Application for the rezoning of Erf 21594 from General Industrial 2 to Risk Industry in terms of Section 42(a) of the Cape Town Municipal Planning By-Law • Application for the approval of Site Development Plan no FP/0326/1171/SDP dated June 2026, for Erf 21594 Kraaifontein in terms of Section 42(i) of the City of Cape Town Municipal Planning Bylaw • Application for a permanent departure in terms of Section 42(b) of the Cape Town Municipal Planning By-law for the departure of the northern common (side) building line from 5m to 2,515m and the Western (rear) common building line from 5m to 1,969m to accommodate the existing building on the premises. • Application in terms of Section 42(b) for a departure to permit a 8,29m and an 8,405m carriage way crossing in lieu of 8m maximum in terms of item 140(2) c of the Cape Town Municipal Planning Bylaw and Development Management Scheme. • Application in terms of Section 42(b) for a departure to permit 7 vehicles to park at 90° to the street and leave the site by reversing over the sidewalk in terms of item 141(1)b of the Cape Town Municipal Planning Bylaw and Development Management Scheme.
Site extent	Unregistered Erf 21594 Kraaifontein measures 9744m ² .
Title Deed Numbers	
Surveyor General ▪ Erf Diagrams	Erf 21594: SG Diagram No. 4409/2000
Registered owner	
Current zoning	General Industrial zone 2
Current land use	Fuel and Truck Depot
Zoning Scheme	City of Cape Town Development Management Scheme

SECTION B

BACKGROUND INFORMATION

2. BACKGROUND.

established in 2013, is the Astron Energy (formerly known as Caltex) Western Cape Branded Marketer supplying petroleum products to Astron Energy (Pty) Ltd. (Astron Energy) service stations and commercial clients in the Western Cape region. Since 2018, has been operating a diesel storage and distribution facility on property described as Erf 21594, 13 Kiaat Street, Kraaifontein Industria (see Figure 1). The facility currently consists of 2 x 23 m³ aboveground diesel storage tanks (denoted Tank 1 and Tank 2) housed in a bund, 2 x 1 hose diesel pumps, a truck workshop, an oil drum store and administration offices. Tank 1 was installed in 2018, and Tank 2 in 2022. In addition, stores approximately 500 m³ of oil/lubricants (99%), degreasol engine cleaner (0.5%) and ethanol solution (0.5%) as well as LPG storage of 1.5 tonnes. The existing depot consists of the following infrastructure: • Office and admin building, • Warehouse building for storage of oils/lubricants, degreasol engine cleaner and ethanol solution, • Truck wash bay facilities, • 2 x 23 m³ aboveground horizontal diesel tanks with dispensing pump for own use, • Truck Workshop building, • Truck staging and car parking facilities.

plans on increasing their on-site storage capacity of petroleum products by an additional 2 454 m³ to:

- improve security of supply,
- optimise logistics efficiency (fuel trucks can load directly at the depot),
- allow for increased flexibility to ad hoc/emergency fuel requests, and
- reduce waiting time at the refinery gantry.

The project will entail the removal of the two existing diesel aboveground storage tanks (ASTs) with a combined capacity of 46 m³ and installation of three new ASTs

with a combined capacity of 2 500 m³. The existing diesel tanks will become obsolete, with own use filling to be taken from the new diesel storage tanks. The project will therefore consist of:

- The demolition of existing structures and buildings to make way for the new tanks.
- Removal of the existing two tanks with a combined capacity of 46 m³ and demolition of bund walls.
- Installation of three new aboveground tanks for the storage of Diesel and ULP 95, as follows: o 2 x 1000 m³ 50 ppm Diesel and o 1 x 500 m³ for ULP 95.
- Construction of a new bund to contain 100% of the contents of the largest tank.
- The associated containment facilities as outlined in SANS 10089 Part 1.
- The required fire protection facilities covering the new infrastructure;
- Construction of separate entry and exit gates for the decanting and loading bulk trucks.
- Trucks for offloading & loading operations will enter the depot via the gate on the left and exit on the right. Trucks for overnight staging will enter the depot via the left gate, pass beyond the new tank farm and park alongside one another.

3. PRE-APPLICATION CONSULTATION.

A pre-application consultation meeting was held on the 18th of September 2025 where the detail of the application was discussed. The intention is to develop the property as a bulk fuel distribution centre. This new use will require the rezoning of the property to Risk Industry Zoning. It was explained that the purpose of the meeting was to determine if there are any principal problems with such intended rezoning application that we should be aware of.

3.1 Current Use of the Property.

Moov energy explained the status quo of their current activities on the property. The main building is the lubricant warehouse and distribution centre. There are also diesel tanks on the premises for the use of their fleet of trucks. The site further

accommodates wash bays and a workshop for their trucks. The Moov Energy fleet is currently parked on the premises if not out on deliveries.

3.2 BAR – Environmental Process.

Kantey and Templer was commissioned to submit a basic assessment report. The BAR report that was influenced by various specialist studies have been submitted. The specialists concluded that there are no fatal flaws in the findings of the Draft BAR report, and no red flags were raised.

3.3 City Fire Department.

The Fire Department enquired about the facility and the proposed storage tanks. It was confirmed that there will be 2 x 1 000 000-liter diesel tanks and 1 x 500 000-liter petrol tank with a possible 4th tank. All the tanks including the petrol tank will be above ground. It will be secondary storage to distribute to Retail Fuel stations and commercial clients.

Fire raised a concern about the petrol tanks being above ground and said it will require a rational design due to the potential danger of storing petrol above ground. It will impact on safety distances and modelling of risk areas will be important to evaluate. The City would also require the applicant to submit a risk assessment report and risk management plan for approval.

It was confirmed that Riscom has compiled a risk management report and that they classified the site as a Low Hazard Establishment and Major Hazard Installation.

3.4 Land Use Management.

LUM (Land Use Management) confirmed that the application will involve a rezoning from General Industrial 2 to Risk Industry as no hazardous substances can be accommodated under the property's current zoning. Land Use will be guided by the evaluation of risk assessment report. The principle of rezoning a General Industrial property to Risk Industry outside an area set out exclusively for risk industries, will be guided by the risk assessment report and risk management plan.

3.5 Way Forward.

The BAR will submit and will run in parallel with the Land Use application.

The land use application with the proposed SDP, risk assessment report and risk management plan will be submitted. The mitigation proposed by the specialists will be incorporated into the application. LUM will follow an early circulation process to internal departments to evaluate the risk prior to the formal advertising process. The fire Department confirmed that they will evaluate the Risk Management Report and Plan as well as the rational design.

The support of Fire is required to proceed to the formal phase of the rezoning application.

4. NATURE OF APPLICATION.

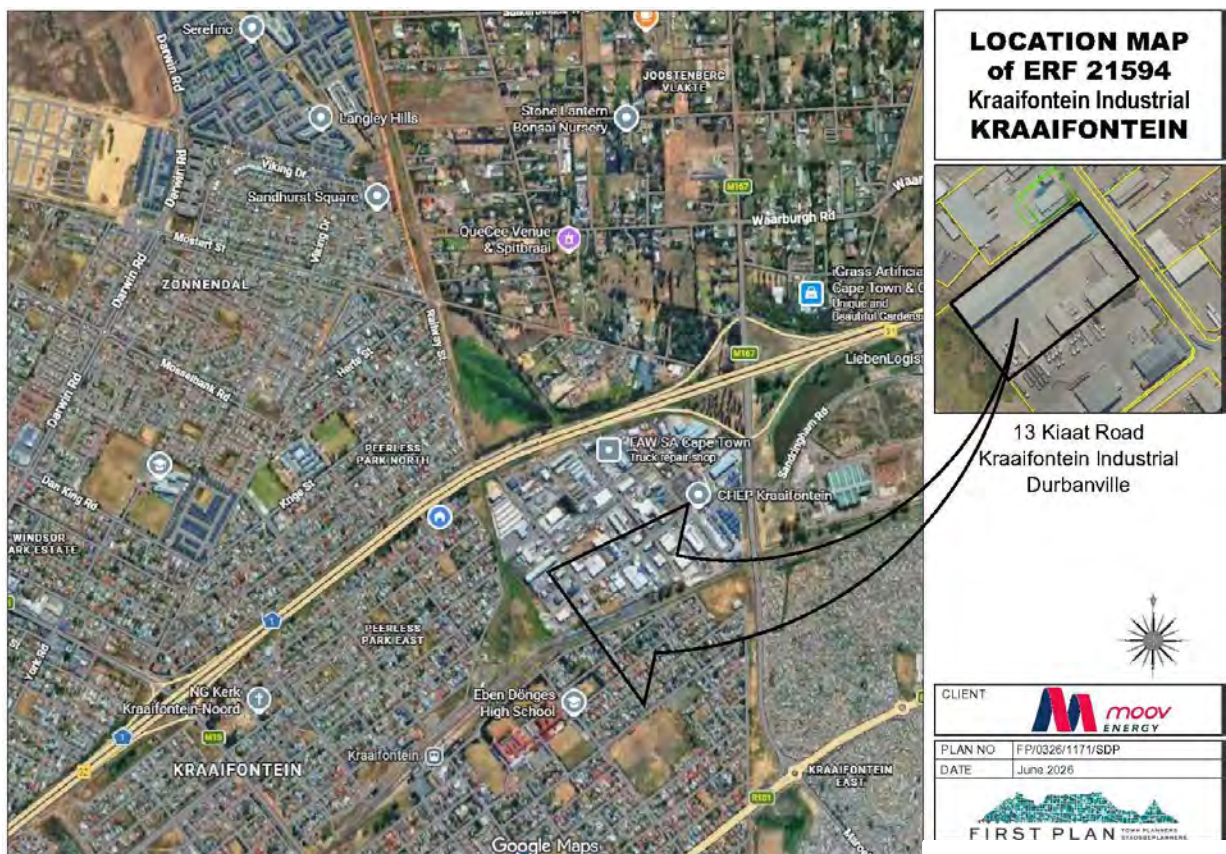
In the light of the above-mentioned background information, the owner of the subject property, Moov Energy (Pty) Ltd, and their development partner appointed **First Plan Town and Regional Planners** under power of attorney to prepare and submit the following applications to enable the proposed development: (Refer to Annexure 1: Power of Attorney, Resolution Letter and Annexure 2: Application Form).

Application in terms of the City of Cape Town Municipal Planning Bylaw of 2015

- 4.1. Application for the rezoning of Erf 21594 Kraaifontein from General Industrial Zone 2 to Risk Industry in terms of Section 42(a) of the Cape Town Municipal Planning By-Law.
- 4.2. Application for the approval of the Site Development Plan FP/0326/1171/SDP dated June 2026, for Erf 21594 Kraaifontein in terms of Section 42(i) of the Municipal Planning By-Law, 2015,
- 4.3. Application for a permanent departure in terms of Section 42(b) of the Cape Town Municipal Planning By-law for the departure of the northern (side) common building line from 5m to

1,969m and the Western (rear) common building line from 5m to 2,515m to accommodate the existing building on the premises

- 4.4. Application in terms of Section 42(b) for a departure to permit a 8,29m and an 8,405m carriage way crossing in lieu of 8m maximum in terms of item 140(2) (c) of the Cape Town Municipal Planning Bylaw.
- 4.5. Application in terms of Section 42(b) for a departure to permit 7 vehicles to park at 90° to the street and leave the site by reversing over the sidewalk in terms of item 141(1) (b) of the Cape Town Municipal Planning Bylaw and Development Management Scheme.



Plan 1: Locality plan Erf 21594 Kraaifontein.

SECTION C

SITE DESCRIPTION

5. DESCRIPTION OF THE AREA AND SURROUNDING LAND USES.

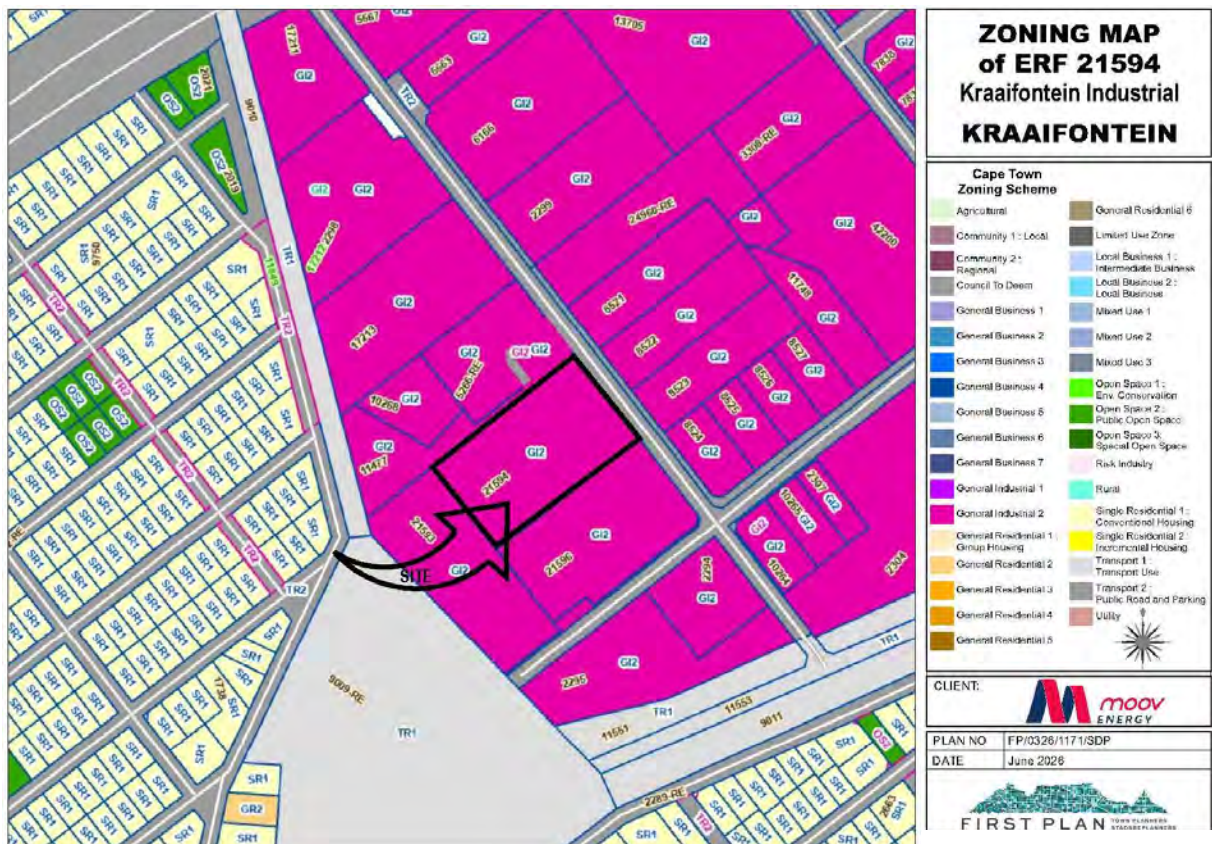
5.1 Property Description and Locality.

Erf 21594 belongs to the Moov Energy (Pty) Ltd and is located at number 13 Kiaat Street Kraaifontein Industrial. Kraaifontein Industria is located on the outskirts of the suburb of Kraaifontein. The N1 highway lies along the industrial area's northern boundary, separating it from the smallholdings of Joostenberg Vlake. A Railway line runs along the industrial area's southern and western boundaries. The railway line separates the industrial area from residential areas of Kraaifontein. The Kraaifontein refuse transfer station, Kraaifontein integrated waste recycling plant, and the informal settlement of Bloekombos are located east of the site

Kiaat Street links with the N1 Freeway via Industrial Road and Industrial Avenue/ Maroela Street. The convenient access to the N1 make the site extremely suitable for a bulk fuel depot that service the city, the Western- and Northern Cape.

5.2 Zonings.

The property is located within the Kraaifontein Industrial node where all the erven are zoned Industrial zone 2. The erven to the west are zoned open space with a railway line running through this open space. There are single residential erven to the west of the rail and open space corridors. The N1 and Joostenbervlakte small holding area is to the north with industrial zoned erven to the east. Bloekombos and Wallacedene residential areas are located to the southwest of Kraaifontein Industria. Open space residential zoned areas and education facilities is located to the south of the industrial area



Plan 2: Zoning Plan

5.3 Surrounding Land Use.

The land uses in the area are in line with the zoning as most of the erven within the larger area is developed and are utilised in terms of their industrial zoning. There is a sufficient buffer surrounding the industrial area that will protect the nearby residential areas from the perceived negative aspects of the industrial area.

5.4 Legal Status.

The consolidation of the property has been registered at the Surveyor General with Diagram No. 4409/2000. The property is held under Title deed _____ and is registered in the name of _____. The Title Deeds are attached as an annexure to this report. There are no restrictive title deed conditions which would prohibit the proposed development as confirmed in the attached Conveyancer Certificates prepared by Nielen Marais Attorneys.

SECTION D

DEVELOPMENT PROPOSAL: SDP

6. DEVELOPMENT PHILOSOPHY.

plays an important role in the distribution of fuel and lubricants to service stations across the Western Cape. They identified the need of expansion and investigated the potential of 3 properties to determine which of the 3 sites is best suited for the new Bulk Fuel Depot. The Kraaifontein Industria property, Erf 21594 proofed to be the most desirable site for the proposed Bulk Fuel Facility.

realised that the proposed new Bulk Fuel Facility triggers many environmental, safety and planning regulations. They appointed consultants and specialists to advise them on the development of the property and to mitigate any potential impacts on the surrounding natural and urban environment.

The development philosophy is to ensure a development that will not impact on the safety and wellbeing of the surrounding communities while mitigating any potential negative impact on the natural environment. The proposed development will increase the capacity of the site and provide additional employment opportunities close to the workforce.

7. SITE DEVELOPMENT PLAN.

plans on increasing their on-site storage capacity of petroleum products on their premises in Kraaifontein Industria. It is proposed to redevelop the existing property into a bulk storage facility by an additional 2 454 m³ to:

- 1) improve security of supply,
- 2) optimise logistics efficiency (fuel trucks can load directly at the depot),
- 3) allow for increased flexibility to ad hoc/emergency fuel requests, and
- 4) reduce waiting time at the refinery gantry.

The project will entail the removal of the two existing diesel aboveground storage tanks (ASTs) with a combined capacity of 46 m³ and installation of three new ASTs with a combined capacity of 2 500 m³. The existing diesel tanks will become obsolete, with own use filling to be taken from the new diesel storage tanks. The project will therefore consist of the following:

- The demolition of existing structures and buildings to make way for the new tanks.
- Removal of the existing two tanks with a combined capacity of 46 m³ and demolition of bund walls
- Installation of three new aboveground tanks for the storage of Diesel and ULP 95, as follows: o 2 x 1000 m³ 50 ppm Diesel and o 1 x 500 m³ for ULP 95;
- Construction of a new bund to contain 100% of the contents of the largest tank.
- The associated containment facilities as outlined in SANS 10089 Part 1;
- The required fire protection facilities covering the new infrastructure;
- Construction of separate entry and exit gates for the decanting and loading bulk trucks.
- Trucks for offloading & loading operations will enter the depot via the gate on the left and exit on the right. Trucks for overnight staging will enter the depot via the left gate, pass beyond the new tank farm and park alongside one another.

The Site Plan makes provision for the removal of the old 23 m³ diesel tanks and the installation of three ASTs (two 1 000 m³ diesel tanks and one 500 m³ ULP 95 tank). As a result, the combined storage capacity will increase to 2 500m³. Therefore, the on-site storage capacity of dangerous goods will be increasing by 2454 m³. The construction of one reinforced concrete bund with intermediate walls, thus allowing all tanks to be located within their own subdivision. A total number of four aboveground tanks can be accommodated within the available space. Under the current project, only three tanks will be constructed with space allowance for a future tank. Each intermediate bund will comprise a drain pit (sump). The project will also involve the demolition of two warehouses (one of which contains a wash bay and the other containing oil drums), an outbuilding at the front of the site, the toilet and office area

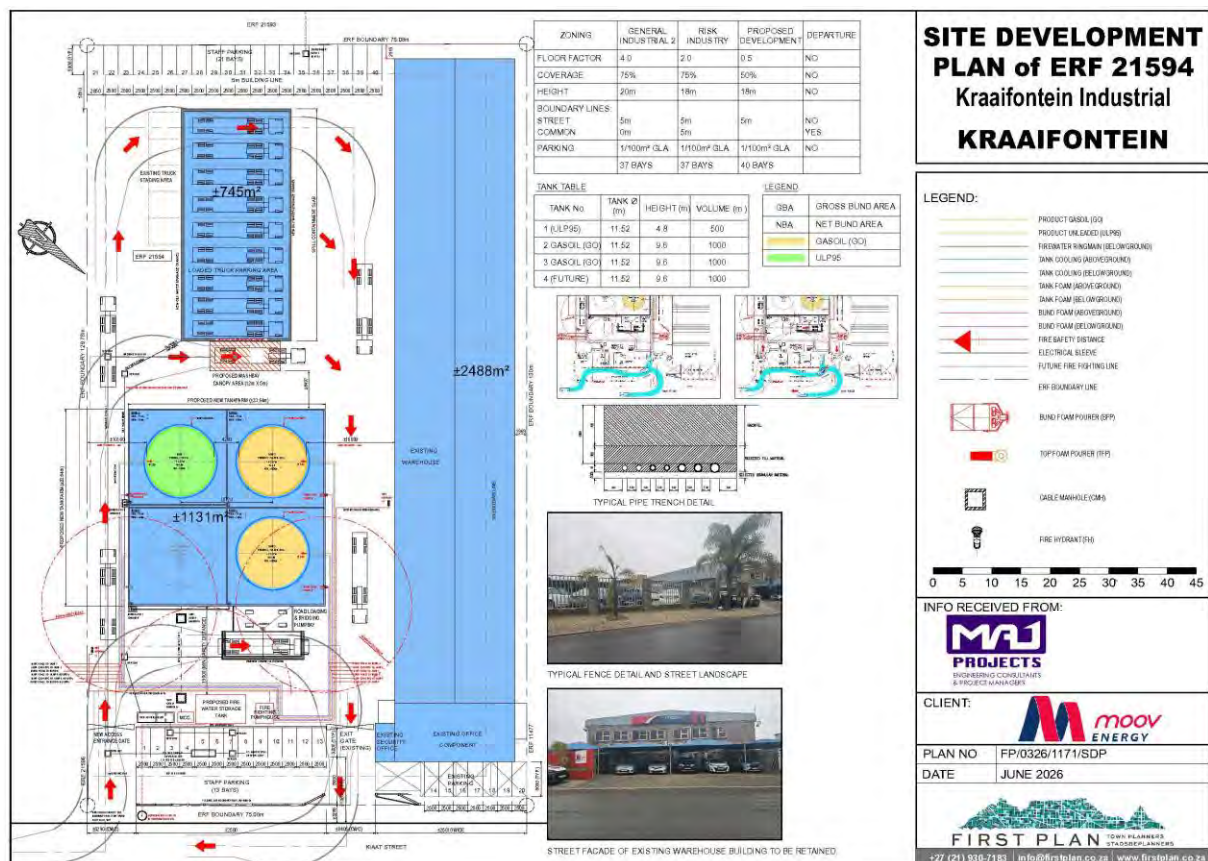
in the middle of the warehouse and two small storerooms (with firefighting equipment mounted on them) to make way for the proposal. The 500 000 L storage of oil/lubes will be moved into the main warehouse, and the position of the LPG storage will be altered, and the wash bay will be relocated. Provision has been made for a roofed area that provide protection for 9 bulk fuel tankers. Trucks for offloading & loading operations will enter the depot via the gate on the left and exit on the right • Trucks for overnight staging will enter the depot via the left gate, pass beyond the new tank farm and park alongside one another.



Photograph 2: Showing the buildings on Erf 21594 that will be demolished to accommodate the new fuel storage tanks.

Tanks will be protected against corrosion by applying protective paint coatings to the external shell and roof as well as the floor and internal surface up to the 1st strake. A new oil water separator will be installed to accommodate oily water from the bunds

and loading area. Any contaminated storm water must pass through the separator to mitigate against the escape of pollutants into the stormwater and sewer drainage systems. It is proposed that the stormwater system be kept separate from the wastewater (sewer) drainage system. The pre-development and post development runoffs are essentially the same because of the extent of hard surfaces being similar. So, no changes to the downstream drainage system of the site would be necessary. The oils to be stored on site will be stored in bunded areas, while the proposed wash bay discharge will pass through the existing oily water separator.



Plan no.3: Proposed SDP

8. REZONING.

This motivation for rezoning must be read in conjunction with section 14 of this motivation report.

Property is currently zoned General Industrial 2 in terms of the Cape Town Development Management Scheme. The development of a bulk fuel depot on the property requires the rezoning of the property to Risk Industry. A Risk industry is defined as follows in the Cape Town DMS:

“Means an undertaking where material handled or the process carried out liable to cause combustion with extreme rapidity, give rise to poisonous fumes, or cause explosion, and includes major hazardous installations and activities involving dangerous and hazardous substances that are controlled in terms of national legislation “

Risk industries are generally located in specific industrial areas that has been zoned Risk Industry. The rezoning of the property from General Industrial 2 to risk industry outside a demarcated risk industry area triggers many environmental and safety requirements. The proposed development therefore requires a Basic Impact Assessment Report that includes many specialist studies such as geohydrological assessments, Risk management report, Risk management plan, Air Pollution assessment and Freshwater study to name a few. An economic impact assessment was also commissioned to determine the economic benefits of the proposed development while the TIA addressed the access and internal truck movement and onsite parking.

The rezoning can only be approved if the specialist studies confirm that the proposed development will not impact on the natural environment or on the safety of the abutting properties. All the specialist studies acknowledged the fact that the site is in an industrial area and that the natural environment adjacent to the site is degraded. The studies further confirm that the Impacts can be mitigated by implementing design measures such as a bund to prevent spillage from the tanks and stormwater oil traps to ensure no oils are discharged into the adjacent wetland.

The property currently functions as a distribution depot for oils and lubricants and accommodate small scale fuel storage. The increase in the storage capacity to a

Bulk Fuel Depot require a change in zoning due to the risk associated with the increased fuel on the premises.

The general operation and the visual impression of the site is however similar in nature to industrial sites. We believe that the proposed development is compatible with the surrounding industrial uses and built form. A survey conducted by Urban Econ in Kraaifontein Industria confirmed this and indicated that most of the factory owners were not opposed to the proposed development.

The most important consideration in evaluating whether a premises is suitable for a risk industry is the compilation of a Quantitative Risk Assessment. This assessment quantifies the potential risks associated with a hazardous event and includes a plan and strategy how to deal with it to reduce the risk. The Cape Town Municipal Planning By-law defines the risk management and prevention plan as follows:

Risk Management and Prevention Plan means a plan, programme or strategy, developed in accordance with guidelines approved by the City, to prevent or minimise danger to the environment or humans from a particular activity or series of activities, and deal with the consequences should a dangerous event occur.”

The Quantitative Risk Assessment included the consequences of fires and explosions at the proposed MOOV facility in Kraaifontein. Some well-known sources of incident data were consulted and applied to determine the likelihood of an incident to occur.

The quantitative Risk Assessment concluded that: **The proposed project will classify the facility as a Low Hazard Establishment Major Hazard Installation, but may increase to a Medium Hazard Establishment Major Hazard Installation with the completion of the future phase, with the increased storage of ULP or diesel.**

The Northern District plan does not differentiate between industrial areas and risk industry areas. The determining factor for establishing a risk industry in an industrial area is whether the risks can be mitigated and whether there are an approved Quantitative Risk Assessment done for the property.

Erf 21594 is designated industrial in the Northern District Plan. The District Plan generally identifies the area for industrial activities and does not, on the face of it, distinguish between General Industrial and Risk Industry zoning categories on the spatial map. The proposed use remains industrial, albeit one that requires a higher level of scrutiny because of its hazardous characteristics. The City's DMS provides a specific Risk Industry Zone and regulatory framework for assessing such activities. Therefor the proposal could be argued to be consistent with the industrial land use designation, with the question being whether the site is suitable for risk industry rather than whether the industrial designation in itself is being departed from.

One can therefore argue that the proposed development is compliant with policy as the property is located within the Kraaifontein Industrial area, in an area set out for industrial activities and uses. It is clear from the specialist reports that are attached to this application, that the impact of the proposed risk industry, can be mitigated to reduce the impact on the abutting industrial area, the nearby residential areas as well as the natural environment and adjacent wetlands. There are sufficient safety mechanisms in place to prevent a hazardous incident.

The proposed Bulk Fuel Depot will create a substantial number of employment opportunities of which many will be for residents of Bloekombos and Wallacedene. The property can provide safe access and egress

Zoning Parameters	Existing General Industrial 2 Zoning	Risk Industry Zoning	Proposed development	Compliant
Floor Factor	4.0	2.0	0.5	Yes
Coverage	75%	75%	50%	Yes
Height	20m	18m	15m	Yes
Building Lines:				
Street	5m	5m	5m	Yes
Common north	0m	5m	1,996m (existing)	No
Common west	0m	5m	2, 525m(existing)	No
Parking Warehouse	1,5bays/100m ² GLA 37 bays	1,5bays/100m ² GLA 37 bays	1,6bays/100m ² GLA 40 bays	Yes

Table 1: Table indicating the proposed zoning parameters in relation to General industrial Zone 2 and Risk Industry zoning.

FP/0326/1171/SDP dated June 2026 retain the existing main warehouse of approximately 2500m² as well as the 90°parking along the road in front of the warehouse.



Photo 3: The warehouse on the property with 90°off-street parking.

The access and egress to the site have been split with a 32m distance between the access points. 3 new fuel storage tanks are provided on a bunt area that can accommodate a fourth tank. The rest of the property accommodates a wash bay and 9 loading bays for fuel tankers. There is sufficient manoeuvring space for the trucks. The site will no longer function as a truck depot, and trucks will only be on site to be washed and to collect a load of fuel.

9. PARKING, ACCESS AND CARRIAGE WAY CROSSING DEPARTURE.

Kantey and Templer prepared a TIA for the proposed Moov Energy Bulk Fuel Facility. The following conclusions are extracted from the report which is attached as an annexure to this application.

MOOV Fuel currently generates 38 EVU trips during the AM peak hour and 45 EVU trips during the PM peak hour. Access to the site is currently situated on Kiaat Road via an 11m wide carriageway crossing. The two-way access serves the main on-site parking area and the fuel depot. Furthermore, access to a shaded parking area with perpendicular parking is located on Kiaat Road.

Application is made in terms of Section 42(b) for a departure to permit an 8,29m and an 8,405m carriage way crossing in lieu of 8m maximum in terms of item 140(2) c of the Cape Town Municipal Planning Bylaw and Development Management Scheme.

A new access/dedicated entrance will be created adjacent to the boundary of Erf 21596 on Kiaat Road. The existing two-way access will be used exclusively as an exit from the site. The shaded parking area will be retained. The dedicated entrance and exit will be spaced approximately 32m apart. The additional carriage way crossing will assist in the on-site manoeuvring of the large fuel tankers and enable them to access onto Kiaat Street in a forward motion. The 2 carriage way crossings will improve circulation on site.

Maroela Road is a public transport corridor well served by minibus taxis and Golden Arrow buses, particularly during the AM and PM peak periods. There are dedicated

bus stops on either side of Maroela north and south of Industrial Road/Sandringham Road. The bus stops are located less than 800m in walking distance from the site.

The non-motorised modes of transport of pedestrians need to be considered. The sidewalk on Kiaat Road adjacent to the site measures $\pm 1,8\text{m}$ in width and is adequate to serve the needs of pedestrians. There are also sidewalks on both sides of Industrial Road which serves as the main pedestrian thoroughfare into Kraaifontein Industria.

The minimum off-street parking requirement for the proposed development within a Standard area is 37 bays. Provision will be made for 40 bays, in the front of the site and along the rear boundary. The parking provision is deemed sufficient in terms of the City of Cape Town Municipal Planning By-Law. The operations of the bulk fuel facility will change as it will no longer double up as a truck depot. Trucks will park at another venue and only use the site to load fuel and oils for delivery. No parking is therefore required for the truck drivers.

Application is also made in terms of Section 42(b) for a departure to permit 7 vehicles to park at 90° to the street and leave the site by reversing over the sidewalk in terms of item 141(1) b of the Cape Town Municipal Planning Bylaw and Development Management Scheme.

This approval is required to enable the vehicles parked at bays 14 to 20 to leave the site at 90° with Kiaat Road. This is an existing situation and this departure is only for technical reasons to accommodate a situation that is already in place on the property.

10. BUILDING LINE DEPARTURES.

Departure from the common building line along the northern and a portion of the western erf boundary in terms of Section 42(b) of the Cape Town Municipal Planning By-Law. This is also a technical correction as there is an existing warehouse along this boundary that has been constructed up to 1,969m from the northern boundary and 2,515m from the rear boundary. This building complies with the building line of

the General Industrial 2 zone which permit buildings at 0m from the common boundaries. The proposed Risk Industry zoning however makes provision for a 5m common building line. The existing building is closer to the erf boundary and within this prescribed 5m hence this application.

This departure is based on the fact that the building is an existing structure, and the departures is only to approve the on-site situation. It will not change the current situation and the impact on abutting properties. The use of the building will also not change as it will accommodate oils for distribution. No highly flammable fuels will be kept in the warehouse for which this departure is required. The safety of abutting properties is therefore not compromised by the building line departures.

11. SPECIALIST STUDIES.

11.1 Wetland Study.

Wetland Assessment undertaken by Freshwater Consulting dated February 2026 confirmed the following: The erf is completely developed with no aquatic habitats or features occurring on it. However, the southern boundary of the site lies adjacent to a wetland on Erf 21593. This wetland is an artificial feature that has formed as a result of stormwater inputs from upslope development and impeded drainage due to the railway line's immediately downslope. The wetland does not support any important or endangered habitats from an ecological perspective. Nevertheless, the wetland does function as a stormwater attenuation pond and therefore provides some level of ecosystem services within the catchment. An ecosystem service demanded of the wetland, given its context within an industrial area, is the amelioration of water quality through assimilation of phosphates, nitrates, and toxicants. Despite the impacts to the wetland, it is able to provide this service to a limited degree.

The wetland discharges directly into the stormwater infrastructure of the City of Cape Town which conveys it to the Mosselbank River. The wetland also overlies an aquifer that is of high susceptibility to contamination from anthropogenic activities. The risk that polluted run-off from the site flows into the artificial wetland would be of

a high significance. However, this impact is addressed by the designs of the bund area and the stormwater management plan. These will include the following measures to prevent the risk of potentially contaminated runoff discharging into the artificial wetland:

During construction there is a risk that the waste material from decommissioned infrastructure will be dumped into aquatic features resulting in their disturbance. Recommendation: All waste (including old fuel storage tanks) must be reused or disposed of at an approved waste disposal facility that can accommodate the type of waste being disposed of. This includes any wastewater that might be pooled in the smaller bund areas of the existing tanks and within the wash-bay. While the construction is undertaken on the site there is a risk that run-off from the construction site (operation of machinery and use of potential pollutants such as cement) will flow into the wetland.

This impairment of water quality should be avoided by installing stormwater management on the site before construction of the rest of the infrastructure.

- During construction, good site management and environmental practices must be ensured by an approved Environmental Control Officer (ECO).
- Construction should take place in summer as there is a lower likelihood of run-off from the site
- Adequate ablutions are provided for contractors;
- Machinery needs to be serviced to ensure there are no oil or fuel leaks, and provided with drip trays when parked; and
- No stockpiling of material or dumping of waste outside of the site footprint. When the site is operational there will be trucks passing through the site each day. This means that during rainfall events, run-off from the site could impact upon the wetland adjacent to the site. A Stormwater treatment system will be applied to address this.

The above report is clear that the proposed impact of the Bulk Fuel Facility can be adequately managed through the implementation of mitigating measures.

11.2. Fire Water Requirements.

The facility will be equipped with a full fire water system comprising of a water tank, booster pump, and foam generating facilities. All manifold valves will be activated via electric actuators. A foam system will be utilized for the top foam pourers to each tank and medium expansion foam pourers for bund fires. The tanks will be equipped with cooling water via cooling rings with spray nozzles designed to deliver the required cooling water application. The semi-automated fire protection system will be activated via depressing the corresponding buttons for the foam and water systems on the mimic panel which is to be installed and operated from the fire-fighting pump station.

A water reservoir of min 171 180 litres will be installed. In addition to the working volume as calculated, the unpumpable volume has been allowed for resulting in a storage volume of 203 000 litres. This is to be stored in a prefabricated steel panel tank. Water supply to the tank will be drawn off the existing municipal water supply. The tank will be fitted with an automatic shut off valve which will close when the tank has reached its capacity and will open when water is drawn from the tank. A booster pump will be utilized (diesel-powered engine) and allowance has been made for a duty and standby unit to be installed. For premix generation, fixed flow in-line inductors will be used which will be connected to a 2000 litre foam concentrate tank.

The proposed fire control measures that will be installed is sufficient to manage and control fire risks associated with the fuel storage on site.

11.3. Socio Economic Impact Assessment.

Urban-Econ Development Economists was appointed to conduct a Socio Economic Impact Assessment of the proposed Moov Energy Bulk Fuel Facility. The purpose

of the Socio-Economic Impact Assessment for the Bulk Fuel Facility (hereafter known as the proposed development) was to determine the current socio-economic baseline characteristics of the study area as well as any potential influence the proposed project may have on the local economy and communities.

This socio-economic impact assessment (SEIA) evaluates the potential positive and negative socio-economic effects that may result from the proposed expansion, particularly in relation to surrounding communities and the local economy. The assessment considers impacts during both construction and operational phases. The information below has been extracted from the Urban Econ Report.

Kraaifontein Industrial is strategically located adjacent to the N1 national highway, encompassing 99 land parcels. Of these, 80% are dedicated to economic activities, while the remaining 20% consist of building parcels, wetlands, road reserves, drains, and vacant land. The area hosts approximately 90 firms, with 76 identified and 14 unidentified. Notable companies operating in Kraaifontein Industrial include Barloworld Logistics, Volvo, and Scania. This diverse economic presence highlights the area's significance as a hub of industrial activity, contributing to the regional economy and providing numerous employment opportunities

The conclusions made in the Socio-Economic Impact Assessment are the following:

- *The proposed increase in storage capacity at the MOOV Fuel facility in Kraaifontein Industria, suggests limited direct socio-economic impacts on residents. However, the economic benefits, such as job creation and increased business activity, could significantly improve local conditions. The low population density in the immediate vicinity means fewer people will be affected by potential disruptions, but the project's contribution to broader economic development could benefit the larger community within the Northern Planning District.*

- *The proposed increase in storage capacity at the MOOV Fuel facility in Kraaifontein Industria is likely to have positive socio-economic impacts, given the high proportion of the population within the employable age range of 20 to 64 years. This suggests significant potential for job creation, which can reduce unemployment and boost economic stability in the area. The youthful workforce in Kraaifontein and the Northern Planning District, especially those aged 20–29, stands to benefit from new employment opportunities and skills development. Lastly, this proposed development is set to boost local socio-economic development by utilising the abundant employable population.*
- *The proposed increase in storage capacity at the MOOV Fuel facility in Kraaifontein Industria could potentially impact the local education profile, which shows that many residents have completed grade 12 or some form of secondary education. Given that Kraaifontein Industrial has a considerable portion of the population with no schooling and only grade 12 education, the project could offer opportunities for skill development and training, enhancing employability. The broader Northern Planning District's higher education attainment indicates a pool of skilled individuals who could fill more specialized roles. Overall, the project may improve local workforce skills and educational outcomes by providing training and development opportunities aligned with the facility's needs.*
- *The proposed increase in storage capacity at the MOOV Fuel facility could positively impact the employment profile in Kraaifontein Industria and surrounding areas. With Kraaifontein and Kraaifontein Industrial having around 21% and 39% of the working-age population not economically active, respectively, and lower employment rates compared to the Northern Planning District (63% employed), the project could offer new job opportunities, thereby reducing unemployment and increasing economic activity. The substantial share of the working-age population in these areas who are currently not employed or economically active highlights the potential for the project to provide employment and contribute to local economic improvement. This is*

especially relevant given the existing lower employment rates compared to the Northern Planning District, which already has a higher employment rate.

Urban Econ conducted a survey under business owners in Kraaifontein Industria where the following were noted.

- **Project Suitability and Location:** Most businesses did not object to the project's location, suggesting that if the project involves expanding their business operations, it could be a suitable addition to the area. There were no objections to the development, and thus no specific reasons for support or objection were provided.
- **Additional Comments or Concerns:** No additional comments or concerns were noted during the engagement session. It was observed that existing businesses did not show significant interest in the proposed expansion, as [redacted] is already an established entity in the area. The increase in storage capacity at the [redacted] facility is unlikely to impact surrounding businesses significantly, except for Fuel Solutions. Given [redacted] current presence and operations, the expansion is not expected to substantially alter the competitive landscape for most businesses in the vicinity.

In the stakeholder engagement with local businesses in Kiaat Street, Kraaifontein Industria, most were aware of the proposed increase in fuel storage capacity at [redacted] but did not see significant benefits for their operations, given their different industry focuses. Fuel Solutions Cape Town, a competitor of [redacted], expressed potential interest in the development due to their related industry. Employee commuting patterns involve local residents and nearby suburbs, with minimal anticipated disruption to the business environment from construction. No major objections or concerns were raised, and the overall impact on local businesses is expected to be

limited, except for possible effects on Fuel Solutions due to the competitive nature of the fuel industry.

Recommendations.

Based on the information presented in the Socio-Economic report, the following recommendations can be made. The proposed Fuel facility development, through its construction and operation, is envisaged to result in positive and negative impacts.

The net positive impacts associated with the construction and operation of the proposed development outweigh the net negative effects. The proposed development is also anticipated to have a positive impact on the local economy and some employment creation during the expansion of the already existing facility. In terms of the assessed site area, there are no fatal flaws from a socio-economic perspective, thus the location is deemed acceptable and should be authorised. The proposed development is seen as acceptable, with no fatal flaws or other potentially significant issues/impacts identified. Additionally, even though the 'no-go' alternative would result in the avoidance of negative impacts from a socio-economic perspective, it would also prevent the realisation of positive effects/impacts.

Since the positive effects and impacts would outweigh the negative effect, the construction and operation of the proposed development are preferred over the 'no-go' alternative. Therefore, the proposed site should be considered for development, subject to the implementation of the recommended mitigation and enhancement measures.

11.4. Quantitative Risk Assessment.

RISCOM (PTY) LTD is a consulting company that specialises in process safety. Further to this, RISCOM* is an approved inspection authority (AIA) for conducting

Major Hazard Installation (MHI) risk assessments in accordance with the OHS Act 85 of 1993 and its Major Hazard Installation regulations (2022).

RISCOM (PTY) LTD was commissioned to conduct a quantitative risk assessment (QRA) for the Moov Energy Kraaifontein Bulk Fuel Facility to determine the impacts onto surrounding properties and communities as part of an environmental impact assessment (EIA). Extracts from this study are used to motivate the land use planning application and the compatibility of the development with the surrounding urban and natural environment.

The purpose of this report is to convey the essential details, which include a short description of hazards, the receiving environment and the current relevant design, as well as risks and consequences of a major incident.

In South Africa, risk assessments are carried out under the legislation of two separate acts, each with different requirements. These are the National Environmental Management Act (No. 107 of 1998) (NEMA) and its Regulations and the Occupational Health and Safety Act No. 85 of 1993. The Occupational Health and Safety Act 85 (1993) is primarily intended for the health and safety of the employees, whereas its MHI regulations are intended for the health and safety of the public. NEMA on the other hand is more focussed towards the protection of the environment.

We are not dealing with the technical detail of the report and refer you to the attached RISCOM report for more detail. We can however confirm that the risk assessment included the consequences of fires and explosions at the proposed facility in Kraaifontein. A number of well-known sources of incident data were consulted and applied to determine the likelihood of an incident to occur.

The proposed project will classify the facility as a Low Hazard Establishment Major Hazard Installation, but may increase to a Medium Hazard

Establishment Major Hazard Installation with the completion of the future phase, with the increased storage of ULP or diesel.

Recommendations.

As a result of the risk assessment study conducted for the proposed MOOV facility in Kraaifontein, a number of events were found to have risks beyond the fuel tank farm boundary. These risks could be mitigated to acceptable levels, as shown in the report. RISCOM did not find any fatal flaws that would prevent the project proceeding to the detailed engineering phase of the project. RISCOM would support the project with the following conditions:

- Compliance with all statutory requirements, i.e., pressure vessel designs; • Compliance with applicable SANS codes, i.e., SANS 10087, SANS 10089, SANS 10108, etc.;
- Incorporation of applicable guidelines or equivalent international recognised codes of good design and practice into the designs;
- Completion of a recognised process hazard analysis (such as a HAZOP study, FMEA, etc.) on the proposed facility prior to construction to ensure that the design and operational hazards have been identified and adequate mitigation are put in place;
- Full compliance with IEC 61511 (Safety Instrument Systems) standards or equivalent to ensure that adequate protective instrumentation is included in the design and would remain valid for the full life cycle of the tank farm;
- Preparation and issuing of a safety document detailing safety and design features reducing the impacts from fires, explosions, and flammable atmospheres to the MHI assessment body at the time of the MHI assessment.

11.5 Atmospheric Impact Report.

DDA Environmental Engineers (DDA) was appointed by K&T Consulting Engineers to compile an Atmospheric Impact Report for the proposed expansion. The main aims of the of the atmospheric impact report are to:

- Describe the environment that may be affected by the proposed operations of the facility.

- Identify all legislation and guidelines that have been considered in the preparation of the impact report.
- Establish a detailed emissions inventory for the air pollutants of concern.
- Predict the ground-level concentrations of the relevant air pollutants, utilising air dispersion modelling.
- Compare the resulting concentrations against relevant South African Air Quality Standards and international air quality guidelines.
- Assess the expected impacts due to the proposed operations.
- Identify emission reduction opportunities and cost-effective emission abatement strategies, if necessary.

proposes to construct three new bulk fuel storage tanks at its Kraaifontein Depot, comprising two 1,000 m³ diesel tanks and one 500 m³ petrol (ULP 95) tank. Air emissions from these storage tanks are primarily composed of volatile organic compounds (VOCs) released during tank filling, along with breathing losses caused by vapour expansion and contraction in response to fluctuations in ambient temperature and barometric pressure. Additional VOC emissions are expected during the loading of fuel into road tankers. The primary pollutants of concern in this assessment are benzene, toluene, ethylbenzene, and xylene. VOC emissions were estimated using the US EPA TANKS 5.0 model, along with applicable US EPA emission factors for fuel truck loading. The air pollution dispersion modelling was carried out with the use of the AERMOD View model. The modelled ground-level concentrations were then compared against the National Ambient Air Quality Standards and international guidelines, and the air quality impacts due to the operations of the Depot were assessed.

Conclusions.

Based on the modelled ground-level concentrations, the following can be concluded:

- The annual benzene concentrations were low and well below the ambient air quality standard of 5 µg/m³. The maximum annual benzene concentrations reached 0.10 µg/m³ at the site.

- The 1-hour and annual concentrations of benzene, toluene, ethylbenzene, and xylene were within the relevant air quality guidelines provided by the ATSDR, TCEQ and OEHHA.
- The resulting ground-level concentrations at the discrete receptors within the residential areas around the facility were found to be very low and are expected to have a very low impact on the ambient air quality in the extended area.
- Due to the low modelled concentrations, the increase of the ambient VOCs concentrations due to the operations of the facility is expected to be insignificant, and the cumulative effect due to these emissions on the ambient concentrations in the extended area is expected to be very low. Based on the dispersion modelling results, the air quality impacts are considered LOW in the industrial area close to the site and VERY LOW to NEGLIGIBLE in the nearest residential areas further away.

Based on these modelled concentrations and the resulting impacts, the proposed expansion should be authorised.

11.6 Geotech.

MTB Geoservices (Pty) Ltd was appointed as professional services provider, with Fairbrother Geotechnical Engineering (Pty) Ltd as sub-consultant. The geotechnical investigation for the civil services component consisted of the drilling and profiling of a borehole to a depth of -8 m below the surrounding EGL, laboratory testing of samples from the site and SPT testing. The geotechnical report addressed the following aspects.

- Allowable Bearing Capacity,
- Founding depth for the foundations,
- Foundation Recommendations
- Groundwater table level and potential implications,
- Material Usability o Excavation Conditions

The regional geology of the area comprises surficial, silty sands of the Springfontyn Formation, which grades into a ferruginous sandy layer with partially cemented

nodules, clasts, and gravels (ferricrete). This ferruginous layer is underlain by residual stiff to very stiff clayey Silts/silty Clays and sandy silts representing weathered shales and siltstones respectively. The residual soils transition into very soft rock shales and siltstones of the Malmesbury Group, Tygerberg Formation.

Conclusion.

The 8.45 m soil profile encountered during the rotary core drilling comprises a 3 m thick layer of medium-dense SAND, underlain by a 3.6 m thick layer of very stiff sandy CLAY, which is in turn underlain by a 1.3m layer of medium-dense SAND, followed by residual very stiff sandy CLAY.

The water table was encountered at approximately 2 meters below natural ground level. The estimated raft footing load is approximately 12500 kN, equating to an approximate foundation pressure of 10 kPa and an allowable bearing pressure of 165 kPa (estimated range of 120 to 180 kPa). Settlement estimations are based on the raft with approximate sides of 34 m and embedment depths of 0.4 – 0.6 m. This translates to estimated settlements of less than 5 mm, assuming a 2.5 safety factor. The visual assessments of the soil consistency, laboratory grading, constrained moduli, and GeoStru software values have been applied to determine the foundation pressures and generic compressibility and settlement values.

Results from this geotechnical investigation indicate that there are no major geotechnical constraints envisaged regarding the proposed installation of fuel tanks.

11.7. Agricultural Impact Assessment.

The site is indicated as having a high sensitivity rating for the Agriculture Theme due to having moderate land capability. Based on the City of Cape Town (CoCT) Northern District Spatial Development Framework Plan, the project site is designated industrial use and falls within the CoCT's delineated urban edge. The site is completely transformed and zoned General Industry 2, which aligns with the spatial development framework of the CoCT. The site and the surrounding erven

contain buildings and other infrastructure (including an electricity substation and railway line).

The project site's surrounding area is predominantly zoned for industry and transport use in terms of the Cape Town Development Management Scheme. No agricultural practices are noted within the Kraaifontein industrial area.

The impact can therefore be considered negligible and thus no Agricultural Impact Assessment will be required.

11.8. Palaeontology Impact Assessment.

The site is indicated as having a low sensitivity rating for the Paleontological Theme as it contains features with a low paleontological sensitivity. SAHRIS' Paleontological Sensitivity Map was checked, and the site was verified to be of low palaeontological sensitivity. Based on the extent of the proposed activity, it is envisaged that the proposed increase in storage capacity will have no impact on palaeontological material. However, should any paleontological material be discovered during excavation work, all construction works will be stopped immediately, and HWC will be notified without delay? Fossil finds procedure to be included in the Environmental Management Programme.

Based on the available information no Palaeontology Impact Assessment would be required.

11.9. Terrestrial Biodiversity Assessment.

The site is indicated as having a very high sensitivity rating for the Terrestrial Biodiversity Theme. This is due to it being located within the Boland Strategic Water Source Area (SWSA) and falling within the Cape Flats Sand Fynbos (CFSF) vegetation type.

SWSAs are natural source areas for water that supply disproportionately large volumes of water per unit area and that are considered of strategic significance for

water security from a national planning perspective, either for surface water, groundwater, or both. The National Spatial Development Framework (NSDF) (DALRRD and DPME, 2021) recommends that land-uses that reduce run-off or stream flow or affect water quality should be avoided in SWSAs, that wetlands in SWSAs should be kept in good condition or rehabilitated, that invasive alien plants in SWSAs should be cleared, that water-related ecosystems and their associated catchments and landscapes be maintained in a natural or at least semi-natural state, and that the use and management of land, rivers and wetlands in SWSAs does not compromise their water production function. The main pressures to SWSAs include the alteration of flow through dams and abstraction of water, removal of natural vegetation along riverbanks or wetlands through cultivation, mining or urban development, growth and spread of invasive alien species, inadequate grazing management, and pollution. Pressures on the ecological condition of SWSAs are often linked to intensive land uses such as cultivation, urban development and mining. This project does not involve these activities and will not result in fragmentation of the landscape as it is proposed to take place on the existing site's footprint.

The project is unlikely to significantly impact surface water and groundwater quality with the proposed mitigation measures in place.

11.10. CFSF.

CFSF is statutorily conserved as small patches in Table Mountain National Park at Tokai, and at Rondebosch Common, Bracken Nature Reserve and Blaauwberg Conservation Area. According to the Cape Flats Sand Fynbos Biodiversity Fact Sheet No. 6 of the City of Cape Town, Cape Nature, SANBI, and South African National Parks, "Some good stands that have not been proclaimed are found at Milnerton Racecourse, Kenilworth Racecourse, 6 Base Ordinance Depot and Platteklouf. Very few additional areas are available that could conserve CFSF - the only potential area that could protect an ecologically representative patch is located east of Blaauwberg Hill, towards the N7." The project site does not fall within any of

these areas. CFSF is mismanaged by mowing, fire protection and by alien plant invasion. None of these activities will take place for the project.

The site is already transformed and devoid of any flora. Therefore, it was determined that the project site no longer supports a suitable habitat for fauna species of concern. The impact could consequently be described as negligible. A Terrestrial Biodiversity Assessment was deemed unnecessary for the proposal.

11.11 Site Sensitivity Verification Report.

Kantey & Templer (Pty) Ltd was appointed by (), as independent environmental consultants, to undertake the Environmental Impact Assessment process required for the increase in petroleum products storage capacity at the and Lubricant Oils Storage and Distribution Facility in Kraaifontein Industria.

The proposed development triggers Activities 34 and 51 as set out in Listing Notice 1 of the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), in terms of the NEMA (Act No. 107 of 1998) as amended and will follow a Basic Assessment Process. The proposal will not result in an increase to the development footprint of the storage and distribution facility, with all anticipated works limited to the existing site.

According to the Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5) (a), (h), and 44 of the NEMA, the current use of the land and the environmental sensitivity of the project site as identified in the Screening Tool Report must be verified. According to the Assessment Protocol for specialist involvement, if any part of the proposed development falls within an area of high or very high sensitivity, the requirements prescribed for such sensitivity must be followed.

This report has therefore been compiled to dispute the sensitivity ratings identified in the Screening Tool Report and provide a rationale for the exclusion of the identified specialist studies to be undertaken as part of this environmental impact assessment process. The motivation below has been extracted from the Kantey and Templer report.

11.12. The following specialist studies, as identified by the Screening Tool Report, have not been carried out:

11.12.1. Agricultural Impact Assessment.

The site is indicated as having a high sensitivity rating for the Agriculture Theme due to having moderate land capability. Based on the City of Cape Town (CoCT) Northern District Spatial Development Framework Map, the project site is designated industrial use and falls within the CoCT's delineated urban edge. The site is completely transformed and zoned General Industry 2, which aligns with the spatial planning framework of the CoCT.

The site and the surrounding erven contain buildings and other infrastructure (including an electricity substation and railway line). The project site's surrounding area is predominantly zoned for industry and transport use in terms of the municipal town planning scheme. No agricultural practices are noted within the Kraaifontein industrial area.

The impact can therefore be considered negligible and thus no Agricultural Impact Assessment will be required.

11.12.2. Moderate Archaeological and Cultural Heritage Impact Assessment.

The site is indicated as having a low sensitivity rating for the Archaeological and Cultural Heritage Theme. The site is already transformed, and the proposed increase in storage capacity will have no impact on heritage resources. The impact by the proposed activity on the Archaeological and Cultural Heritage Theme can therefore be described as negligible. No Archaeological and

Cultural Heritage Impact Assessment will be required. A heritage screener and Notice for Intent to Develop (NID) was however submitted to Heritage Western Cape (HWC). According to the Heritage Screener undertaken by CTS Heritage dated May 2025, “it is unlikely that the proposed development will impact on significant heritage resources.” The subsequent response received from HWC confirmed “there is no reason to believe that the proposed increase in petroleum products storage capacity at the Moov fuel and lubricants facility in Kraaifontein Industria will impact on heritage resources.

11.12.3. Palaeontology Impact Assessment.

The site is indicated as having a low sensitivity rating for the Paleontological Theme as it contains features with a low paleontological sensitivity. SAHRIS’ Paleontological Sensitivity Map was checked, and the site was verified to be of low palaeontological sensitivity. Based on the extent of the proposed activity, it is envisaged that the proposed increase in storage capacity will have no impact on palaeontological material. However, should any paleontological material be discovered during excavation work, all construction works must be stopped immediately, and HWC must be notified without delay? Fossil finds procedure to be included in the Environmental Management Programme. No Palaeontology Impact Assessment would be required.

11.12.4. Terrestrial Biodiversity Assessment.

The site is indicated as having a very high sensitivity rating for the Terrestrial Biodiversity Theme. This is due to it being located within the Boland Strategic Water Source Area (SWSA) and falling within the Cape Flats Sand Fynbos (CFSF) vegetation type. Sensitivity Scoring Sensitivity Features Very High SWSA (SW)_Boland Very High Cape Flats Sand Fynbos SWSA: SWSAs are natural source areas for water that supply disproportionately large volumes of water per unit area and that are considered of strategic significance for water security from a national planning perspective, either for surface water, groundwater or both.

The National Spatial Development Framework (NSDF) (DALRRD and DPME, 2021) recommends that land-uses that reduce run-off or stream flow or affect water quality should be avoided in SWSAs, that wetlands in SWSAs should be kept in good condition or rehabilitated, that invasive alien plants in SWSAs should be cleared, that water-related ecosystems and their associated catchments and landscapes be maintained in a natural or at least semi-natural state, and that the use and management of land, rivers and wetlands in SWSAs does not compromise their water production function. The main pressures to SWSAs include the alteration of flow through dams and abstraction of water, removal of natural vegetation along riverbanks or wetlands through cultivation, mining or urban development, growth and spread of invasive alien species, inadequate grazing management, and pollution.

Pressures on the ecological condition of SWSAs are often linked to intensive land uses such as cultivation, urban development and mining. This project does not involve these activities and will not result in fragmentation of the landscape as it is proposed to take place on the existing site's footprint. Additionally, the project is unlikely to significantly impact surface water and groundwater quality with the proposed mitigation measures in place. CFSF: CFSF is statutorily conserved as small patches in Table Mountain National Park at Tokai, and at Rondebosch Common, Bracken Nature Reserve and Blaauwberg Conservation Area. According to the Cape Flats Sand Fynbos Biodiversity Fact Sheet No. 6 of the City of Cape Town, Cape Nature, SANBI, and South African National Parks, "Some good stands that have not been proclaimed are found at Milnerton Racecourse, Kenilworth Racecourse, 6 Base Ordinance Depot and Platteklouf. Very few additional areas are available that could conserve CFSF - the only potential area that could protect an ecologically representative patch is located east of Blaauwberg Hill, towards the N7." The project site does not fall within any of these areas. CFSF is mismanaged by mowing, fire protection and by alien plant invasion. None of these activities will take place for the project. Additionally, the site is already transformed and devoid of any flora. Therefore, it was determined that the project site no longer

supports a suitable habitat for fauna species of concern. The impact could consequently be described as negligible. A Terrestrial Biodiversity Assessment was deemed unnecessary for the proposal. Aquatic Biodiversity Impact Assessment As mentioned above, the study site is located within the Boland Strategic Water Source Area. The site is, however, completely transformed for its current use with no water features present on-site. A depression wetland is located directly adjacent to the site within a shared ESKOM and Transnet servitude. This wetland is not registered as a NFEPA1-wetland and appears to be a permanent wetland which has vegetation comprising of both alien and indigenous vegetation (i.e., reeds, sedges, lilies and grasses). The area is largely transformed and contains a high degree of pollution/litter visible within wetland. Consequently, the wetland is assumed to offer limited to no ecological functionality. The wetland receives stormwater inputs from upslope developments, and the drainage therein is impacted by the downgradient railway line. A Wetland Assessment will be undertaken to confirm this. The proposed activity is unlikely to have any impact on the water resources in the surrounding area. The impact by the proposed activity on the Aquatic Biodiversity Theme can therefore be considered to be negligible. An Aquatic Biodiversity Impact Assessment was not deemed necessary for this proposal, as no freshwater systems, other than the depression wetland adjacent to the site, are present on or within a 500 m radius of the project site.

11.12.5. Noise Impact Assessment.

The project site is developed (as a diesel storage and distribution facility) within a built-up, well established industrial area of Kraaifontein, with the nearest residential area 109 m from the project site. The increase in storage capacity of petroleum products will not significantly increase the ambient noise levels currently experienced in this area. Consequently, a Noise Impact Assessment was deemed unnecessary for this proposal.

11.12.6. Plant Species Assessment.

The site is indicated as having a low sensitivity rating for the Plant Species Theme. The site is however well-established as a diesel storage and distribution facility, is completely transformed (built-up), devoid of any flora, and not located close to any intact indigenous vegetation. The proposed increase in storage capacity would therefore have no impact on the Plant Species Theme. The impact is therefore considered to be negligible, and a Plant Species Assessment was deemed unnecessary for this proposal.

11.12.7 Animal Species Assessment.

The site is indicated as having a medium sensitivity rating for the Animal Species Theme due to the potential occurrence of the following sensitive species in this region. Species Scarabaeus (Pachysoma) aesculapius Habitat The South-Western African dung beetle subgenus Scarabaeus (Pachysoma) aesculapius is endemic to the West Coast of Southern Africa and the habitat of the species is firm sand on coastal hummocks, riverbanks and vegetated dunes. Peringuey's Meadow Katydid (Conocephalus peringueyi) Peringuey's Meadow Katydid (Conocephalus peringueyi) are only found in mountains of the fynbos biome. Yellow-Winged Agile Grasshopper (Aneuryphymus montanus) The Yellow-Winged Agile Grasshopper (Aneuryphymus montanus) is associated with fynbos vegetation, South-facing cool slopes and rocky foothills. The project site is completely transformed and devoid of any vegetation, therefore the site does not provide a suitable habitat for the animal species of concern. The vulnerable animal species indicated in the Screening Tool Report are therefore unlikely to be found on site or to be impacted by the proposed activity. The impact of the proposed activity on the Animal Species Theme can therefore be considered negligible. No Animal Species Assessment would therefore be required.

11.12.8. Hydrology Assessment.

A Hydrology Assessment was deemed unnecessary for the proposal, as the project site is completely transformed and no watercourses, other than the

previously mentioned wetland adjacent to the site, are situated within a 500 m radius of the project site. The nearest river is 1 593 m from the site boundary.

A Wetland Assessment will however be undertaken. Additionally, a stormwater management plan will be compiled for the project to discuss the proposed measures to control stormwater on the site.

11.13. The following theme's sensitivity ratings, as identified by the Screening Tool Report, are disputed by the EAP:

11.13.1 Civil Aviation Theme.

The Civil Aviation Theme was rated as having a high sensitivity due to the site being located between 15 and 35 km from a civil aviation radar and a major civil aviation aerodrome as well as within 8 km of other civil aviation aerodrome (such as the Cape Winelands Airport (FAWN) located approximately 7.2 km from the site). The proposed increase in storage capacity is highly unlikely to impact the Civil Aviation Theme as the project will not involve the construction of high structures that will obstruct flight paths and will not create glare issues or interfere with navigation systems. The impact can therefore be considered to be negligible.

11.13.2 Relative Defence Theme.

The Defence Theme was rated as having a medium sensitivity. In all likelihood this is because of military, naval or air force infrastructure/bases or communication/radar zones being located within relatively close proximity to the project site such as Air Force Base Ysterplaat (approximately 21 km away). However, no defence-related components are in direct proximity to the site. The project will not host extremely tall structures, transmission equipment, or features likely to interfere with air navigation, radar or line-of-sight operations. The project does not pose a national security concern and will not generate electromagnetic emissions that could interfere with air traffic communication, surveillance, or radar systems. The proposed increase in storage capacity will

thus have no impact on the Defence Theme or any other matters relating to national security. The impact will therefore be negligible.

12. SERVICES.

This application is for the redevelopment of an existing fully serviced industrial site. An infill development and service connections are available in the area. It has been confirmed at the time of the rezoning approval that there is capacity in the network to accommodate the development as per the proposed SDP.

12.1. Stormwater Management Plan.

Kantey and Templer Engineers have been appointed compile a storm water management plan for the proposed development. They are also responsible for the civil infrastructure which will mainly be dealing with the internal site works as the service connections are in place.

The traditional design of stormwater drainage systems has been to collect and convey stormwater runoff as rapidly as possible to a suitable location where it can be discharged. This traditional design can however result in drainage and flooding problems downstream. The objective of a storm water management plan is therefore to manage the stormwater resources of the collective watersheds to:

- Prevent flood damage,
- Preserve the natural and beneficial functions of the natural drainage system.

The stormwater management strategy will be to manage and collect surface runoff and roof water, and if necessary, pass it through a detention tank/structure system before discharging the water into the stormwater drainage system at a peak discharge rate equal to or less than the pre-development flow. For this site, the runoff will be required to pass through a new detention tank/structure system. Stormwater Runoff to determine the effective stormwater catchment area, site characteristics such as slope, ground cover and rainfall intensity are considered. For this site, the entire site is considered the catchment area. The site is currently covered by hardened surfaces (driveways, hardstand areas and buildings). At

present, the captured stormwater runoff is allowed to flow across the site towards the western and eastern boundaries. It can be shown that the site characteristics in terms of ground cover will not change as a consequence of the proposed development and thereby will not affect the stormwater flows across the site. In essence a new bund around the tanks will further enhance the stormwater management on the property. The Application

12.2 Traffic Impact Assessment.

Kantey and Templer Engineers have been commissioned to conduct a Traffic Impact assessment for the increase in traffic caused by the new bulk fuel facility. They compiled a detailed TIA that is attached as an annexure to this report. The paragraphs below have been extracted from their report.

12.2.1 Road Network.

The site is well served by existing road infrastructure and is located within an intermediate (industrial) roadside development environment near the City of Cape Town urban edge. Vehicular access to the site will be located on Kiaat Road, approximately 85m from Industrial Road. Kiaat Road, an 8m wide road, is classified as a Class 5 local (industrial) street within the City of Cape Town's road network. Access to Kiaat Road is achievable from Industrial Road also classified as a Class 5 street. However, Industrial Road, an extension of Sandringham Road, serves as a Class 4 Collector as it provides access to the other side streets and abutting driveways within Kraaifontein Industria from Maroela Road. Maroela Road is a Class Minor Arterial which connects the N1 Freeway to Kraaifontein via the Lucullus Street/Maroela Road interchange. The surrounding road network is illustrated in Figure 2 below.

12.2.2. Trip Generation.

The trip generation requires an estimation of the additional traffic to be generated by the proposed development typically from trip rates contained in the COTO TMH17 Trip Data Manual. However, the TMH17 does not provide trip rates for bulk fuel storage facilities. Therefore, the additional traffic was

calculated using first principles and analysis of the existing operations and site traffic patterns.

Based on the previous table, MOOV Fuel can be expected to generate 98 and 99 EVU trips during the AM and PM peak hours in future, respectively. Therefore, the proposed development can be expected to generate an additional 60 and 54 EVU trips on the surrounding road network during the AM and PM peak hours, respectively.

12.3 Proposed Improvements.

As previously discussed, the quantum of traffic generated by the facility during peak hours is fairly insignificant in relation to the background traffic network and is unlikely to have any significant impact on prevailing traffic operations. This will result in a fairly low impact on the traffic operations at the key intersections. Therefore, no geometric improvements are required to the network at any of the key intersections.

12.4. Access to the Site.

Access to the site is currently situated on Kiaat Road via an 11m wide carriageway crossing. The two-way access serves the main on-site parking area and the fuel depot. Furthermore, access to a shaded parking area with perpendicular parking is located on Kiaat Road.

A new access/dedicated entrance will be created adjacent to the boundary of Erf 21596 on Kiaat Road. The existing two-way access will be used exclusively as an exit from the site. The shaded parking area will be retained. The dedicated entrance and exit will be spaced approximately 32m apart.²

12.5. Parking Requirements.

The site is located in a 'Standard area' which refers to requirements that apply to areas with standard parking needs, or where public transport is not specifically promoted or available. In accordance with the City of Cape Town's Municipal

Planning By-Law, the minimum off-street parking requirement for the site using the “Industry” parking ratios is calculated below:

2488m² GLA @ 1,5 bays/100m² GLA = 37 bays According to the site layout plan, provision will be made for 40 bays which is deemed sufficient in terms of the Municipal Planning By-Law

Maroela Road is a public transport corridor well served by minibus taxis and Golden Arrow buses, particularly during the AM and PM peak periods. There are dedicated bus stops on either side of Maroela north and south of Industrial Road/Sandringham Road. The bus stops are located less than 800m in walking distance from the site. The non-motorised modes of transport of pedestrians need to be considered. The sidewalk on Kiaat Road adjacent to the site measures ±1,8m in width and is adequate to serve the needs of pedestrians. There are also sidewalks on both sides of Industrial Road which serves as the main pedestrian thoroughfare into Kraaifontein Industria

13. APPLICABLE POLICIES.

13.1. National Policies.

The following national planning policies is applicable to the proposed development.

13.1.1 National Development Plan 2030.

The ***National Development Plan 2030*** (South African Government, 2010) aims to eliminate poverty and reduce inequality by 2030. South Africa can realise these goals by drawing on the energies of its people, growing an inclusive economy, building capabilities, enhancing the capacity of the state, and promoting leadership and partnerships throughout society. Given the complexity of national development, the plan sets out six interlinked priorities:

- Uniting all South Africans around a common programme to achieve prosperity and equity;

- Promoting active citizenry to strengthen development, democracy and accountability;
- Bringing about faster economic growth, higher investment and greater labour absorption;
- Focusing on key capabilities of people and the state;
- Building a capable and developmental state; and
- Encouraging strong leadership throughout society to work together to solve problems.

Implication: The proposed development in Kraaifontein Industria aligns with the goals and objectives outlined in the NDP 2030 by contributing to the growth and development of the Kraaifontein area. It supports economic growth and investment by enhancing the capacity and efficiency of local fuel storage and distribution, which can stimulate local economic activities and create additional jobs. To add, the project highlights additional labour absorption by generating employment opportunities during both the construction and operational phases. By addressing logistical needs and ensuring a stable fuel supply, the expansion also promotes infrastructure development, contributing to the broader goal of building a capable and developmental state.

13.1.2 National Spatial Development Perspective 2006.

The **National Spatial Development Perspective 2006** (The Presidency, 2006) perspectives are increasingly being recognised as critical tools for bringing about coordinated government action and alignment to meet social, economic and environmental objectives. Future settlement and economic development opportunities should be channelled into activity corridors and nodes that are adjacent to or that link the main growth centres. Areas with demonstrated economic potential provide greater livelihood and income

protection because of a greater diversity of income sources and overcoming poverty.

In the South African context, the fundamental goal of the National Spatial Development Perspective is to reshape the spatial relations inherited from apartheid and to enact spatial priorities aligning with the constitutional mandate of delivering essential services universally, thereby alleviating poverty and inequality, among this is rapid economic growth that is sustained and inclusive is a pre-requisite for the achievement of other policy objectives, among which poverty alleviation is key.

- Beyond the constitutional obligation, government spending on fixed investment should be focused on localities of economic growth and/or economic potential to gear up private-sector investment, to stimulate sustainable economic activities, and create long-term employment opportunities.
- Efforts to address past and current social inequalities should focus on people, not places.
- To overcome the spatial distortions of apartheid, future settlement and economic development opportunities should be channelled into activity corridors and nodes that are adjacent to or that link the main growth centres. Infrastructure investment should primarily support localities that will become major growth nodes in South Africa and the SADC region to create regional gateways to the global economy.

Implication: The proposed development in Kraaifontein Industria aligns well with the objectives of the National Spatial Development Perspective 2006 (NSDP). It supports economic development by attracting private-sector investment and creating long-term employment opportunities in a locality with demonstrated economic potential. By enhancing fuel storage and distribution capacity, the project strengthens the activity corridor linking Kraaifontein with main growth centres in Cape Town and the Northern Planning District. This

fixed infrastructure investment positions Kraaifontein Industrial as a significant growth node, facilitating regional and global economic integration. Additionally, the project addresses social inequalities by creating jobs and improving livelihood opportunities for the local population. Overall, the expansion aligns with the NSDP's goals of promoting economic growth, infrastructure development, and poverty alleviation, contributing to spatial transformation.

13.2. Provincial Policy.

The following provincial policy/strategy is applicable to the proposed development.

13.2.1. Western Cape Provincial Strategic Plan 2019 – 2024.

The Western Cape Provincial Strategic Plan 2019 - 2024 (Western Cape Provincial Government, 2020) outlines the strategic framework for the medium-term budget policy priorities at the provincial level, which in turn are in alignment with the NDP strategic outcomes. There are 5 Vision-inspired Priorities (VIPs) that the Western Cape Government put out as a focus for the 2019 - 2024 years to create a safe WC where everyone prospers. The provincial strategic plan (PSP) clearly details how, over the 5 years they will:

- Build safe and cohesive communities
- Boost the economy and job creation
- Empowering people
- Promote mobility and spatial transformation
- Driving innovation and culture

VIP 2 above identifies five priority areas for boosting economic development, including investment facilitation and promotion, infrastructure development, export support and promotion, skills development, and resource resilience. Through VIP 4 on mobility and spatial transformation, the WCG envisions that more people will use safe, reliable, affordable, and low-carbon public transport. With more mixed-use, mixed-income neighbourhoods and sustainable densification of economic centres, the average time, cost, and distance of

commuting is reduced. Through leveraging provincial and municipal investments in infrastructure, human settlements, spaces, and services, the government can connect, integrate, and transform communities, while reducing the vulnerability to climate change (Western Cape Government, 2020).

Implication: The proposed expansion of the facility in Kraaifontein Industria aligns with the Western Cape Provincial Strategic Plan (PSP) 2019-2024 in several keyways. The project supports the PSP's Vision-inspired Priorities (VIPs), particularly VIP 2 and VIP 4. By generating employment opportunities during both construction and operational phases, the development boosts the local economy and job creation, directly addressing VIP 2's focus on economic development through investment facilitation and infrastructure development. The project's focus on local labour employment will help improve income levels and living standards for residents in Kraaifontein, Kraaifontein Industrial, and nearby areas like Joostenbergvlakte and Wallacedene, stimulating safe and cohesive communities as envisioned by VIP 1. The infrastructure investment in Kraaifontein Industria also promotes mobility and spatial transformation (VIP 4) by enhancing local economic centres and supporting sustainable densification.

13.3. Local Policies.

13.3.1. City of Cape Town Municipal Spatial Development Framework MSDF 2023.

The highlights that the City is intent on building a more inclusive and vibrant city that addresses the legacy of apartheid, rectifies existing imbalances in the distribution of different types of residential development, and avoids the creation of new structural imbalances in the delivery of services. The CoCT MSDF retains three spatial strategies, namely:

- Building an inclusive, integrated, vibrant city;

- Managing urban growth and create balance between urban development and environmental protection; and
- Planning for employment and improve access to economic opportunities.

The CoCT MSDF 2023 has an overall intention of guiding and managing urban growth, and to balance competing land use demands, by putting in place a long-term, logical development path that will shape the spatial form and structure of Cape Town (City of Cape Town, 2023).

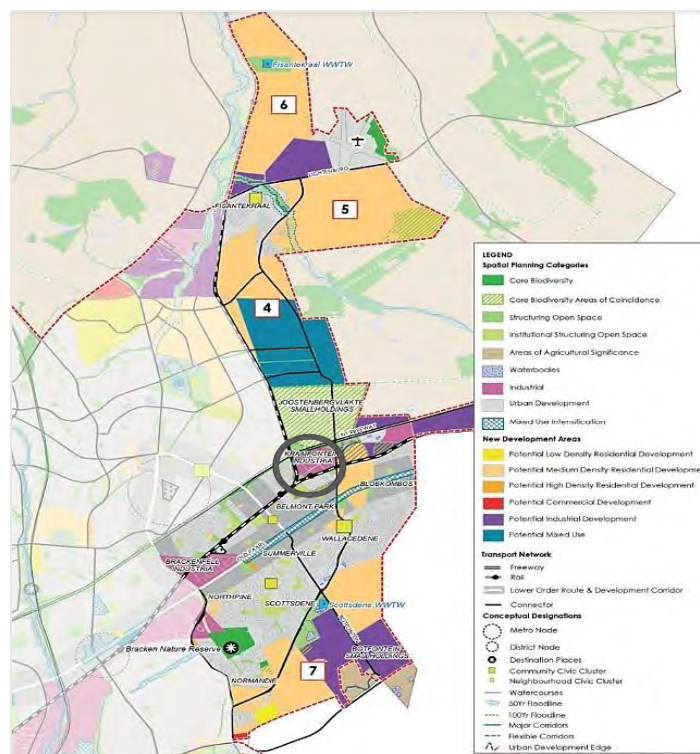
13.3.2. Northern District plan.

The Northern District Spatial Development Framework (NDSDF), encompassing the jurisdictional area of the City of Cape Town east of the N7, along with the region north of the N1 and east of the R300, guides the spatial development process in the district. It includes areas such as Bellville, Durbanville, Kraaifontein, Brackenfell, Fisantekraal, as well as rural settlements like Klipheuwel, Mikpunt, Joostenbergvlakte, and Philadelphia. This medium-term district plan informs new developments in the area, drawing from three strategies outlined in the District Plan, which are derived from the City of Cape Town Municipal Spatial Development Framework (City of Cape Town, 2023).

- Strategy 1 focuses on planning for employment and enhancing access to economic opportunities by integrating land use, economic development, and transport systems.
- Strategy 2 emphasises managing urban growth while preserving the environment, seeking to minimise impacts on biodiversity, wetlands, and agricultural areas. It also advocates for developing open spaces in underserved areas.
- Strategy 3 aims to build an inclusive, integrated, and vibrant city, promoting integrated settlement patterns and equal opportunities.

Kraaifontein Industrial is within Subdistrict 3 of the Northern Planning District. This subdistrict, representing the eastern section of the district's urban footprint, is characterised by mostly higher-density, more affordable residential developments (Fisantekraal, Wallacedene, Bloekombos), some smallholding areas (Botfontein, Kruisfontein, parts of Joostenbergvlakte), industrial areas, and vacant land, some of which is still used for farming (horticulture). The Malmesbury rail line and the future extension of Lucullus Road from the R312 form the backbone of the area.

The District Plan makes provision for the extension to Kraaifontein Industrial Area (south of N1). Kraaifontein Industrial is well located to serve areas in need of job opportunities such as Wallacedene. While the industrial area is almost fully developed, the land allocated to the east (along Sandringham Road) is an expansion of the industrial area, spanning approximately 60 hectares. This land might also be used for large-scale industrial activities, such as distribution centres.



Plan 2: Extract from the Northern District Spatial Development Framework with the proposed Bulk Fuel Facility located in the industrial area marked with the green circle on the plan.

13.3.3. City of Cape Town Integrated Development Plan 2022 – 2027.

The **City of Cape Town Integrated Development Plan 2022 – 2027** (City of Cape Town, 2022) is a five-year plan which serves as the principle strategic planning instrument that guides and informs all planning and development and decisions in the municipality. Local government policies are anchored in three core principles in the CoCT IDP 2022-2027, namely, sustainability, resilience and environmental transformation through transit orientated development. These principles are aimed at achieving the CoCT IDP 2022-2027 vision of an opportunity city with an enabling environment for business and job creation. In addition, the City has identified 11 priorities that span their strategic focus areas (The Opportunity City, The Safe City, The Caring City, The Inclusive City and the Well-Run City), such as:

- Economic inclusion;
- Safe communities;
- Building integrated communities;
- Resource efficiency and security; and
- Leveraging technology for progress.

In addition, the Integrated Development Plan 2022 – 2027 states that Cape Town's environment, including its natural resources, landscapes, infrastructure, forms the basis of its economy and plays a vital role in building resilience.

Implication: The proposed expansion of the MOOV Fuel facility in Kraaifontein Industria aligns with the City of Cape Town Integrated Development Plan (IDP) 2022-2027 by contributing to economic inclusion and job creation, supporting the IDP's vision of an opportunity city. It will create employment opportunities for residents in Kraaifontein, Kraaifontein Industrial, and nearby areas, enhancing local income levels and living standards. The project's investment in infrastructure enhances fuel storage and distribution, contributing to resource efficiency and security, and aligns with the IDP's principles of sustainability and resilience. Additionally, the facility's modernization with advanced technology

supports the IDP's priority of leveraging technology for progress, making it a valuable addition to Cape Town's economic and social landscape.

The City of Cape Town Municipal Spatial Development Framework MSDF 2023 highlights that the City is intent on building a more inclusive and vibrant city that addresses the legacy of apartheid, rectifies existing imbalances in the distribution of different types of residential development, and avoids the creation of new structural imbalances in the delivery of services. The CoCT MSDF retains three spatial strategies, namely:

- Building an inclusive, integrated, vibrant city;
- Managing urban growth and create balance between urban development and environmental protection; and
- Planning for employment and improve access to economic opportunities.

The CoCT MSDF 2023 has an overall intention of guiding and managing urban growth, and to balance competing land use demands, by putting in place a long-term, logical development path that will shape the spatial form and structure of Cape Town (City of Cape Town, 2023).

Implication: The proposed expansion of the facility in Kraaifontein Industria aligns with the City of Cape Town Municipal Spatial Development Framework (MSDF) 2023 by supporting the spatial strategies of building an inclusive, integrated, and vibrant city, and planning for employment and improving access to economic opportunities. The development enhances infrastructure and economic activity in a strategic location, promoting inclusivity and integration by creating additional jobs and improving service delivery. By modernizing the fuel facility, the project also supports sustainable urban growth and balances development with environmental protection, aligning with the MSDF's vision of a well-planned and equitable urban landscape.

13.3.4. City of Cape Town Transport Orientated Development (TOD) Strategic Framework (March 2016).

Transit Oriented Development (TOD) represents the intricate relationship between “Transit” and “Development”. This new land use scenario has been developed with the intention of providing a future toward an optimized land use scenario for the City that provides for a compact, well connected, efficient, resilient urban form and movement system that is conducive to economic and social efficiency and equality whilst providing cost effective access and mobility. This land use scenario further provides an aspirational future spatial picture towards which the City will need to mobilise its resources and strategic investment and align its policies and strategies in order to achieve the desired urban efficiencies in the future.

The core TOD principles are defined as follows:

- Affordability – reduce the cost of public transport to commuters and the cost of providing public transport to the City.
- Accessibility – facilitate equal access to social and economic activity through strategic urban development and the provision of safe public transport.
- Efficiency – provide an environment and level of service that reduces trip lengths and dependence on private vehicles.
- Intensification and Densification – manage the desired form, composition, and location of urban development conducive to affordable, accessible and efficient public transport.

It is thus a development strategy with a bias towards viable public transport and therefore speaks to urban form, development type, development intensity and development mix and the objectives thereof are defined as follows:

- Maximise “location efficiency” so that people can walk, cycle, and use public transport.
- Boost ridership and minimize congestion thereby ensuring that the public transport system becomes more viable.

- Provide a rich mix of housing, shopping, recreational, industrial and transportation choices.
- Enable cost and operational efficiencies in the provision and design of urban infrastructure.
- Drive down the cost of the User Access Priority for both new and existing residents.
- Create a sense of place.

The proposed bulk fuel facility is located within an area where public transport is available. It is within easy walking distance from Wallacedene and Bloekombos residential areas where a large percentage of the workforce reside. The facility is about distributing fuel and the proximity to the N1 Highway is an important location driver.

13.3.5. Economic Development Strategy, 2013.

The proposal is consistent with this strategy since it will ensure that growth is environmentally sustainable in the long term by providing an essential fuel delivering service to stimulate the economy of the Western Cape. The proposed development will not only created employment to workers at the bulk fuel Depot, but also to the drivers delivering the fuel and to the many businesses that is reliant on the fuel that is delivered by throughout the Western Cape.

13.3.6. Social Development Strategy, 2013.

The proposal will have a positive socio-economic impact as it will provide a substantial amount of direct and indirect employment opportunities. It will assist in providing jobs close to the work force of Wallacedene and Bloekombos.

SECTION E

COMPLIANCE WITH SECTION 99.

14. COMPLIANCE WITH SECTION 99 OF THE CAPE TOWN MUNICIPAL PLANNING BY-LAW.

14.1. Compliance with Section 99 (1).

14.1.1 Procedural Requirements.

The application complies with the prescribed procedural requirements.

14.1.2 Compliance with Municipal Spatial Development Frameworks.

The application is for the approval of the Rezoning, Departures and a Site Plan. Compliance to the planning policies was motivated in the section 13 of this report.

15. COMPLIANCE WITH SECTION 99 (2).

The application complies with all the spatial frameworks applicable to the site.

15.1. The proposed development complies with the relevant criteria contemplated in Development Management Scheme. The proposal complies with the broad principles of the applicable city policies.

15.2. The desirability of the proposed development is supported by all the site-specific environmental studies as well as broad planning policies. It has been proved that the facility can operate safely and that there are sufficient mitigating measures to minimise any potential impacts on the environment and the abutting urban area.

15.2.1 The proposed development of the large bulk fuel storage facility on an industrial zoned property requires a rezoning to Risk Industry. Risk industries are generally located in isolated industrial areas that is away from residential areas to reduce any potential impact. The location of the Kraaifontein Industrial area provides many location advantages such as easy access to the main distribution route in the Western Cape. It is also close to the workforce and

surrounded by other industrial uses. Specialist studies have been conducted to evaluate aspects such as air pollution, ground water pollution fire risks. A Quantitative Risk Assessment has been compiled and the project was classified as a **Low Hazard Establishment Major Hazard Installation**. The design of the facility has been influenced by the specialist studies and will mitigate potential impact on the environment and the surrounding industrial area. It supports the rezoning of the industrial site to that of Risk Industry for the specific use as a bulk fuel depot. There is no reason to believe that the proposed development will impact negatively on the rights of abutting environment, resident's and business owners in the immediate area.

- 15.2.2.** The rezoning application complies with the conditions and regulations of the Cape Town Municipal Planning By-Law.

16. COMPLIANCE WITH SECTION 99 (3).

16.1. Socio Economic Impact.

The approval of the Bulk Fuel Facility will have a positive impact with regard to:

- The proposed development is within walking distance to a large percentage of the workforce that will reduce traveling cost to the place of employment.
- Employment will be generated during the construction and operational phase of the development.
- Stimulate economic growth in the Western Cape as fuel that is a key commodity for most economic activities will be distributed throughout the region.

16.2. Compatibility with Surrounding Uses.

The proposed development complies with policy. The visual character of the site will be of an industrial nature and compatible to the surrounding industrial premisses. The rezoning to risk industry is only required due to the increase in fuel storage being over the threshold for storage on general industrial properties. Specialist studies we conducted to mitigate potential risks and to inform the design to prevent impact on the surrounding natural and urban environment. A survey under existing industrial owners in the area did not raise any concerns about the

proposed rezoning and use of the site as a bulk Fuel Facility. One can therefore argue that the surrounding industrial owners support the proposed development and see it as compatible with the area and surrounding land uses.

16.3. Impact on Engineering Services.

The proposed development will not impact on service delivery in the area. The property is fully serviced and there is sufficient capacity in the network to accommodate the proposed change in use. Additional infrastructure has been installed to mitigate potential risks. These include a fire control system, oil traps and filters to ensure the stormwater runoff is not polluted.

16.4. Impact on Safety, Health, and Wellbeing of the Surrounding Community.

The risk report and other specialist studies concluded that proposed development will not impact on the health and wellbeing of residents of the area. The proposed mitigating measures will ensure that the site can operate safely and that any potential pollution can be retained on site and disposed in a safe manner. The development will comply with all the municipal requirements and the National Building Regulations. We believe there are sufficient mitigating measures in place to safeguard the safety, health and wellbeing of the surrounding community.

16.5. Impact on Heritage.

The proposed development will not change the character of the property as it will retain its industrial nature. The site is not located in a heritage landscape nor are there any conservation worthy buildings on the property. The proposed development does not trigger any application in terms of the Heritage legislation. This has been confirmed by Heritage Western Cape with the issuing of a NID.

16.6. Impact on Biophysical Environment.

The proposed development is a fully developed property in an approved and developed industrial area. The proposed rezoning to accommodate a bulk Fuel Facility triggers a Basic Environmental Assessment and many specialist studies such as freshwater studies, air pollution, and a quantitative risk assessment. The

specialist studies confirmed that if the mitigating measures are implemented, the proposed development will have a limited impact on the biophysical environment.

Official environmental authorisation has now also been received confirming that in view of all matters concerned, including “...the NEMA principles, compliance with the conditions stipulated in this Environmental Authorisation, and compliance with the EMPr, the Competent Authority is satisfied that the authorised Listed Activities will not conflict with the general objectives of Integrated Environmental Management stipulated in Chapter 5 of the NEMA and that any potentially detrimental environmental impacts resulting from the undertaking of the Listed Activities can be mitigated to acceptable levels.” (Please refer to Annexure 21: Copy of Environmental Authorisation dated 19 June 2026)

16.7. Traffic Impacts, Parking access and other Transport Related Considerations.

The proposed development can provide safe access and egress and can accommodate sufficient on-site parking as required by the Cape Town DMS.

SECTION F

CONCLUSION

17. REASONS FOR SUPPORT.

Reasons for recommending the decision for approval may be summarized as follows:

- The proposed development complies with the criteria of the Cape Town Municipal Planning By-Law and SPLUMA
- The property complies with the applicable planning policies
- The many specialist studies that have been conducted support the proposed rezoning to Risk industry and the development of the Bulk Fuel Facility, as also confirmed by the Environmental Authorisation as received.
- It will not impact on the nearby residential area or the surrounding industrial area as the risks can be adequately mitigated.
- The site is suited for its use as risk industry.
- Impact on surrounding businesses is minimal and the owners in the industrial area had no concerns during a site survey conducted by Urban Econ.
- No impact on heritage resources
- No impact on biophysical environment, as also confirmed by the Environmental Authorisation as received
- Engineering services and capacity is available as the site is already serviced
- The proposed development is compatible with the build environment in which the site is located.

Supporting specialist studies confirm that the site identified as industrial in the Northern District plan can be rezoned to Risk Industry. The proposed development is an intensification of an existing use on the property. It will therefore not introduce a new land use into the area.

18. CONCLUSION.

In conclusion, the situational analysis of the proposed expansion of the MOOV fuel facility in Kraaifontein Industrial area highlights its strategic significance in enhancing the local industrial landscape. Situated in a key industrial zone with strong economic

activities and excellent connectivity to major transportation routes, this development aligns with regional growth strategies and local development goals. By boosting storage capacity and updating infrastructure, the expansion is set to drive economic growth, generate employment, and benefit surrounding communities. Additionally, the project's comprehensive approach to environmental, social, and economic impacts emphasizes its potential to contribute positively to the broader objectives of spatial and economic development within the City of Cape Town

First Plan therefore request the City of Cape Town to approve the rezoning to Risk Industry to ensure that the proposed development with all its benefits can be implemented

We therefor request the delegated authority to approve the proposed SDP.



PA Beukes

ANNEXURES

- 1 Application Form**
- 2 Power of Attorney and Resolution**
- 3 Locality Plan**
- 4 Zoning Plan**
- 5 Diagram**
- 6 Title Deed**
- 7 Conveyancer Certificate**
- 8 Site Development Plan**
- 9 Quantitative Risk Assessment**
- 10 Freshwater Assessment**
- 11 Socio-Economic Impact Assessment**
- 12 Geotech**
- 13 Site Sensitivity Verification Report**
- 14 Stormwater Management Plan**
- 15 Traffic Impact Statement**
- 16 Northern District Plan**
- 17 Geohydrological Assessment**
- 18 Atmospheric Impact Assessment**
- 19 Pre-Application Consultation**
- 20 Basic Assessment Report**
- 21 Copy of Environmental Authorisation**

Agricultural	General Residential 6
Community 1 : Local	Limited Use Zone
Community 2 : Regional	Local Business 1 : Intermediate Business
Council To Deem	Local Business 2 : Local Business
General Business 1	Mixed Use 1
General Business 2	Mixed Use 2
General Business 3	Mixed Use 3
General Business 4	Open Space 1 : Env. Conservation
General Business 5	Open Space 2 : Public Open Space
General Business 6	Open Space 3: Special Open Space
General Business 7	Risk Industry
General Industrial 1	Rural
General Industrial 2	Single Residential 1 : Conventional Housing
General Residential 1 : Group Housing	Single Residential 2 : Incremental Housing
General Residential 2	Transport 1 : Transport Use
General Residential 3	Transport 2 : Public Road and Parking
General Residential 4	Utility
General Residential 5	

CLIENT:

PLAN NO	FP/0326/1171/SDP
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DATE	June 2026
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