

**Jessica**

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**Subject:** FW: Erf 245, Atlantis: Proposed Extruded Polystyrene (XPS) Plant DBAR: General comment

**From:** Christopher Hewett <Christopher.Hewett@capetown.gov.za>

**Sent:** Monday, 08 July 2019 10:04 AM

**To:** Jessica <jessica@ecoimpact.co.za>

**Cc:** Timothy Hadingham <Timothy.Hadingham@capetown.gov.za>

**Subject:** Erf 245, Atlantis: Proposed Extruded Polystyrene (XPS) Plant DBAR: General comment

Hi Jessica,

The Draft Basic Assessment Report for Swartland Insulations (Pty) Ltd in Atlantis industrial refers (Ref: 16/3/3/11A1/2/3015/19). I would like to submit a general comment to DEA&DP around the comments that are submitted by City Departments during EA applications in the Atlantis Industrial area.

The proposed investment will result in increased economic activity and employment creation for the area of Atlantis. The Enterprise and Investment (E&I) Department is therefore in support of this Environmental Authorisation (EA) application. It must be noted that the City of Cape Town is implementing various incentivised measures towards becoming a more investor friendly destination in order to grow the local economy and create much needed job opportunities. One of these measures is the fast tracking of development applications in the targeted investment areas of the City (in line with COCT Policy no: 12506). This involves removing systemic bottlenecks or unnecessary red tape that investors face in those targeted areas. The Atlantis industrial area is such a targeted area where the fast tracking of development applications is offered to investors. It is also Cape Town's green technology Special Economic Zone (SEZ) where the City has placed special emphasis on attracting investment into this area. This application falls within the SEZ.

Certain comments made by City departments during the circulation processes of EAs get placed as conditions of approval once issued by DEA&DP. These conditions pull through to the City's development application processes (e.g. during building plan application stage) and once approved becomes statutory requirements that investors must comply with. A number of investors in Atlantis have flagged some of these conditions as onerous or unwarranted red tape that has negative time and cost implications on their developments. In certain instances it has resulted in delays in construction commencing or occupancy of new buildings thereby delaying operations. This detracts from the investor friendly environment that the City is trying to create in Atlantis.

In light of this the E&I Department is requesting that DEA&DP, as the competent authority for issuing EAs, considers these implications when finalizing their conditions of approval in Atlantis industrial. The following is requested:

- potentially onerous or unwarranted comments / conditions that could cause delays during the **development application processes** of the City be avoided or applied sensibly. This also includes conditions that could delay **construction commencement** and **occupancy certification**;
- that final conditions allow for flexibility in their implementation. For example landscaping could be implemented after occupancy certification has been obtained, thereby avoiding potential delays in the investment becoming operational;
- to avoid unwarranted or duplicated comments, City departments should reference the relevant policy or regulatory frameworks in terms of which their comments/requests are made.

Kind regards,

**Christopher Hewett**

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