

**BASIC ASSESSMENT PROCESS FOR THE PROPOSED DEVELOPMENT OF AN APARTMENT BLOCK AND ASSOCIATED INFRASTRUCTURE ON ERF 46 AND ERF 47 (TO BE CONSOLIDATED INTO ERF 580), CLIFTON
DEA&DP PRE-APPLICATION REFERENCE NO: 16/3/3/6/7/1/A7/5/3067/20**

COMMENTS RECEIVED ON THE BID:				
No.	Name:	Comment:	Respondent:	Response:
1.	Kathleen Whittaker 16 October 2020	Project should not be allowed. No buildings exceeding 3 stories should be permitted on Victoria Road.	CHAND	<p>Independent specialist assessments confirm that the proposal has responded to the existing-built environment of Victoria Road through careful design. The height of the building has specifically been restricted so as not to prevent views or result in a “visual intrusion” when considering the existing development context. The stretch of Victoria Road where the proposed development site is located is characterized by multi-storey apartment buildings which exceed three storeys. In this regard, the proposed building design reflects the local typology. The Visual Impact Statement undertaken by Gibbs (2020) (refer to Annexure G1) confirms that the development responds to the visual character of the surrounding context and that the proposed building would not obstruct views from either Kloof Road or Victoria Road (which are scenic drives), especially since the site is located above Victoria Road and the building’s southern elevation would be below Kloof Road.</p> <p>Lavin (2020) concurs with this statement that the proposed development fits in with the existing context of Clifton (refer to Heritage Screener in Appendix G5).</p> <p>(Refer also to Figure 23 and 24 in the BAR for a visual simulation of the proposed building which shows synergy with the local context).</p>
2.	Whittaker Family Trust 16 October 2020	Objection An invasive 9 storey structure on a scenic drive is insane! Reduce it to max 4 stories.	CHAND	See response above.
3.	CapeNature Marius Wheeler	CapeNature has screened the following land use planning application which have been determined to not have any	CHAND	Noted.

	21 September 2020	significant impacts on biodiversity and we will not be providing detailed comments due to limited capacity. CapeNature has currently no Land-Use official in Landscape West, which includes the Cape Metro.		
4.	Mukhtar Joonas 9 February 2021	<p>1. I would like to express what I say to ALL developers looking at removal of restrictions and conditions. Asking departures without any justification or merit. Greedy rezones replacing small units with large buildings now an eye sore in Clifton. Disregarding the aims and Goals of NEMA, 5m road widening and the scenic drive restrictions. Why are 5m road widening GIVEN AWAY but COCT while there is dire need of parking in Clifton. One house replaces with 20 flats. ZERO visitors parking. NO road parking and No respect of the road widening universal policy which is for future generations where ALL new building are Moved BACK. There is NO merit or justification except making more money here. It is unacceptable. It is wrong.</p> <p>2. The fast densification has changed the CHARACTER of Clifton. Increase Supply of unit causes a decrease in value due to the basic law of oversupply.</p> <p>3. Lastly the traffic nightmare using the Metropolitan road a private construction site is UNACCEPTABLE, UNFAIR and ABUSIVE to the thousands that use this road daily including residents. Single lanes affect thousands of</p>	CHAND	<p>1. Issues related to departures and title deed restrictions will be dealt with as part of the town planning application which will be subject to its own public participation process and be decided upon by the local authority, the City of Cape Town, who is mandated to do so. These issues are not relevant to the environmental application and as such responses to comments related to town planning will not be provided here. It is however worth noting that there will be no application for road widening under this proposal (if indeed, that is what is meant by the statement from the I&AP referring to "5m road widening").</p> <p>2. A Visual Impact Statement (Gibbs, 2020) which assessed the local spatial context and landscape character, and the suitability of the proposed development within this context was undertaken and the findings thereof included in the Basic Assessment Report (BAR). The study found that the proposed development is unlikely to affect the overall character of the streetscape of both Kloof Road and Victoria Road, which is already heavily built-up and highly urbanized, thus the nature of proposed development is visually congruent with the immediate context. This is also corroborated by another independent specialist through the Heritage Screening exercise. Both reports are appended to the draft BAR in Appendix G.</p> <p>3. A Traffic Impact Assessment by Fautley (2020) concluded that the development would not have an undue detrimental impact on traffic and that identified</p>

		<p>road users DAILY for YEARS. It is ABUSIVE and UNFAIR. This road is Not conducive to large developments and developers must use their OWN property NOT the road as site logistics and building area.</p> <p>4. NEMA says NO development is allowed and no more than 5m3 are to be removed from any site. If it is somehow allowed it has to be MINIMIZED not the other way around.</p>		<p>impacts could be suitably mitigated. The temporary closure of a section of Victoria Road southbound carriageway would be required during the demolition stage (of an anticipated 4 months) and can be mitigated with a Traffic Management Plan which will entail managing directional traffic flow past the site with stop/go traffic control by flagmen. The Traffic Management Plan would need to be approved by the local authority prior to building works commencing and the implementation thereof would be strictly enforced through the EMPr and required environmental monitoring. As specified by the EMPr, the temporary road closure would be during business days (excluding weekends and public holidays) and would be during the day in the off-peak period when background traffic flow is low. No lane closures for general hoarding purposes are anticipated.</p> <p>4. This is an incorrect understanding of the NEMA and associated EIA Regulations, 2014 (as amended). The EIA Regulations prescribe that Environmental Authorisation is required from the Competent Authority for developments which would entail the removal of more than 5 cubic metres of material within 100m of the high-water mark (Listed Activity 19A of Listing Notice 1). This listed activity does not preclude development but requires a Basic Assessment process to be undertaken to understand the environmental impacts associated with the development in order for the environmental authorities (DEA&DP) to make an informed decision as to whether the development should be permitted or not. If the DEA&DP decides to grant Environmental Authorisation, then the authorisation would come with conditions</p>
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5.	Helet Merkling 28 April 2020	<p>1. We appreciate open discussion with each other to ensure that the Azalea development will safely take place with due, prior consideration of the beneficial development of the municipal strips of land adjacent to and above the Azalea Development site, please.</p>	CHAND	<p>1. I&APs will be afforded multiple opportunities to engage with the project material and project team as per the Public Participation Process Plan approved by the DEA&DP and as outlined in the BAR. Comments on the proposal can be submitted to Chand</p>

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		<p>planning and development arrangements with the consent of affected nearby neighbouring property owners of that municipal drainage passage and slope. Ideally that strip of land should be rented from the City by the Azalea developer and a private, secure stairwell between Kloof Road and Victoria Rd. with accommodation of municipal services' supply to affected neighbouring properties be instituted with the costs thereof shared by the City – as with the public open space even bordering Kloof Road above the Azalea site, please.</p> <p>9. We are aware of the existence of an alluvial map for the Lions Head and Clifton area which may be useful to you in your research.</p> <p>10. The City's Environmental department will also be able to assist you with information regarding existing water streams and underground water, as will Mr. Stuart Chait and Mr. Stefan Antoni in Nettleton Road whom we understand have lingering water ingress problems at their properties. We request that you please contact them too for information about the water problems in the area.</p>		<p>Department regarding the drainage channel which emanates from the Public Open Space above the site (refer to Appendix V). In agreement with the department and as suggested by the freshwater specialist, the project would re-route this drainage channel to the existing corridor located along the southern border of the site to address current erosion issues (should the proposal be authorised). There will be no development within the service corridors which is municipal land under the management of the City.</p> <p>9. Noted with thanks.</p> <p>10. Noted with thanks. The City's various line departments have been notified of the availability of the pre-Application Draft BAR for comment. Any comments received from the Environmental Department will be incorporated into the next Draft BAR.</p>
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