

HE PROPOSED IRT PHASE 2A TRUNK ROUTE: PORTION E1, 3.5KM OF GOVAN MBEKI ROAD FROM INTERSECTION WITH HEINZ/OTTERY ROAD TO APPROX 130m EAST OF LINK ROAD, MANENBERG & GUGULETHU

COMMENTS RECEIVED DURING THE PRE-APPLICATION BASIC ASSESSMENT PROCESS				
No.	Name:	Comment:	Respondent:	Response:
1.	F Rhoda Department of Water and Sanitation 8 February 2018	<p>The document dated 25 January 2018 with your reference number, E1DWS01 refers.</p> <p>The Department has perused the above mentioned document and has the following comments:</p> <p>In the document, it is stated that wetlands 1, 2 and 4 will possibly be infilled, as well as sediment/solid waste traps will possibly be installed upstream of the Lotus Canal. Please note that any development within the 1:100 year flood line or 100m from the riparian habitat whichever is the greatest or within a 500m boundary of a wetland or water resource triggers water uses in terms of sections 21 (c) "impeding or diverting the flow of water in a watercourse" and (i) "altering the bed, banks, course or characteristics of a watercourse" of the National Water Act, 1998 (Act no. 36 of 1998).</p> <p>According to the document and risk matrix submitted, a Water Use Licence will be required should alternative 1 be pursued. If alternative 2 and 3 are envisaged, a General Authorisation could be obtained. The Department requires you to submit a comprehensive risk matrix as part of the Water Use Authorisation application for the chosen alternative, together with mitigation measures to further mitigate the loss of wetland habitat.</p>	CHAND	Alternative 3 is the preferred Alternative, as such application for General Authorisation has been submitted to the Department for Section 21 (c) & (i) water uses, as indicated (refer to Appendix Q of the BAR).
2.	Rashaad Samaai Environmental Professional Officer: Environment and Heritage Management Branch Environmental Management Department	We are satisfied with the proposal in point 2 below and would rather see that mitigation is in the form of measures to avoid the impact on the Edith Stephens Nature Reserve. For example, design and construct an impermeable dyke below ground level to prevent subsurface drainage toward the reserve as mentioned by Gibb in the meeting held in April.	CHAND	<p>I just wanted to follow up on the City's comment on the freshwater impact assessment and botanical impact assessment for the IRT E1 work package (near Edith Stephens). You may recall from our meeting that we required the City's written comment on the wetland offset issue at this stage in the process so that we could address it before the report is published for public comment.</p> <p>Please could you let me know more or less when the</p>

	27 June 2018			comment will be provided? For your interest, we met with the DWS and they have indicated two things: 1) The proposal would likely be able to be authorised under a GA- the freshwater risk matrix just needs to be updated- note that this has been done and formal feedback is awaited from DWS... 2) The DWS would likely recommend an offset for the wetland lost, however given that the only functionality of the wetland to be filled in is related to stormwater, they would be happy to accommodate the offset in the form of a swale in the cross-section of the road - the updated risk matrix and an offset calculation must accompany the next part of the online application. The freshwater ecologists have just received approval from a contractual perspective to continue with the wetland offset calculations so those will be available in the next few weeks.
COMMENTS RECEIVED ON THE POST APPLICATION DRAFT BAR PUBLIC REVIEW PERIOD				
3.	Moosa Joseph Moosa Joseph Enterprises – Nu Star motors 27 August 2021	We are situated on the corner of Becker Road and Govan Mbeki Road. We operate a Shell service station which is in the process of being demolished and rebuilt (KDR).	CHAND	Noted and confirmed that you have been registered as an adjacent landowner on the I&AP database for the project.
4.	William Lily Kwanza sands minerals: Projects Manager: Mining SA 30 August 2021	Kwanza has the property (silica mine) to the North. We need to be notified if any of the activities will affect our property.	CHAND	Noted and confirmed that you have been registered as an adjacent landowner on the I&AP database for the project.
5.	Dr. Rhinah Singo National Department of Water and Sanitation 30 August 2021	POST-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PUBLIC REVIEW AND COMMENT AS PART OF THE BASIC ASSESSMENT PROCESS FOR THE PROPOSED IRT PHASE 2A TRUNK ROUTE: PORTION E1, 3.5KM OF GOVAN MBEKI ROAD FROM INTERSECTION WITH HEINZ/OTTERY ROAD TO APPROX 130M EAST OF LINK ROAD, MANENBERG & GUGULETHU Your document dated 26 August 2021 with DEA&DP Ref No. 6/3/3/1/A2/19/3040/21 refers 1. This Department has evaluated the above-mentioned application and please	CHAND	1. Noted

		<p>note that the Department's pre-application comments dated 08 February 2018 regarding this application are still applicable, where Section 21(c) "diverting or impeding flow in a watercourse" and Section 21(i) "changing the bed, banks, course or characteristics of a watercourse" of the National Water Act (Act No. 36 of 1998) have been identified.</p> <p>2. The Department is aware of the Water Use Authorisation logged for section 21 (c) and (i) on the e-Wulaas for the proposed development. Please note that this development may not commence prior to an approval of the Water Use Authorisation from the Department.</p> <p>3. The following other water uses in terms of Section 21 of National Water Act (Act No. 36 of 1998) have been identified:</p> <ul style="list-style-type: none"> • It is indicated that a borehole could be drilled in the vicinity of the proposed development to supply potable water. This triggers Section 21(a) water use: "taking water from a water resource"; • The storing of water in the farm dam that will require treatment to potable standards for domestic use triggers Section 21(b) water use: "Storing water"; • The use of treated effluent for irrigation triggers Section 21(e) water use: "engaging in a controlled activity"; and • The discharging of treated effluent or stormwater runoff which may be conveyed into the 		<p>2. Noted.</p> <ul style="list-style-type: none"> • This is incorrect. No boreholes are proposed, as such a Section 21 (a) water use has not been applied for. • This is incorrect. The proposal does not include storage of water in a farm dam. As such, application for a Section 21 (b) water use has not been made. • There will be no use of treated effluent for irrigation. This water use is thus not applicable. • There will be no discharge of treated effluent to any watercourses. In terms of stormwater, a new minor system would comprise a series of underground
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		<p>watercourse triggers Section 21(f) water use: "discharging waste or water containing waste into a water resource through a pipe, canal, sewer, sea outfall or other conduit.</p> <ul style="list-style-type: none"> The above water uses must be authorized and registered in terms of the National Water Act (Act 36 of 1998) before the proposed development may commence. Please note that as from January 2018, this Department ONLY accepts electronic water use applications. Water use applications can be submitted by following http://www.dwa.gov.za/projects.aspx and then click on e-wulaas. <p>4. Please note that a groundwater monitoring programme must be put in place and must include the following:</p> <ul style="list-style-type: none"> The groundwater levels must be measured on a monthly basis and must be recorded against time and date; The monitoring well must be sampled bi-annually preferably in April and October. The samples must be submitted to SANAS accredited laboratories for analysis for Hydrocarbons (including but not limited to the following: BTEXNM+TAME and TPH). All parameters analysed for should be included in the SANAS Schedule of Accreditation of the laboratory; 		<p>pipelines to convey the stormwater from the road into existing stormwater lines, or to catch pits and then to 375mm diameter outlet pipes, which would daylight into the Lotus Canal (Gibb, 2021). Stormwater does not constitute wastewater and as such, it is understood that Section 21 (f) is not relevant and application does need to be made for this water use activity.</p> <ul style="list-style-type: none"> Not applicable as explained above. <p>4.This is understood to not be applicable as there will be no groundwater abstraction on site.</p>
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		<ul style="list-style-type: none"> • A monitoring report by a qualified Geohydrologist must be submitted to the Department every year; • The monitoring should be done regularly and the data stored in a safe place. The data should be available to the Department on request. <ol style="list-style-type: none"> 5. Please be advised that the confirmation of water supply and sanitation services from the City of Cape Town Municipality must still be submitted to this Department for further commenting. 6. No abstraction of surface or groundwater may be done without prior authorisation from this Department, unless it is a Schedule 1 Use or an Existing Lawful Use. 7. The Department supports the proposed invoice for the removal of solid waste from the proposed development. Please note that measures to control illegal dumping of construction waste must be in place as this may result in pollution of the surface water run-off. 8. No pollution of surface water or ground water resources may occur due to any activity on the property. 9. Please note that stormwater must not be allowed to runoff into the natural environment unless it is clean and not polluted. 		<ol style="list-style-type: none"> 5. This has been obtained, refer to Appendix E16 of the BAR. 6. Noted, no abstraction is proposed at this stage. 7. Waste management measures to ensure the proper waste handling and disposal have been included in the EMPr (refer to Appendix H of the BAR) and will be monitored by an Environmental Control Officer (ECO). Fines are prescribed by the EMPr in the event of illegal dumping of construction waste. 8. Several pollution prevention measures have been included in the EMPr for strict implementation including the compilation of a Stormwater Management Plan (refer to Appendix G (d) of the BAR) 9. Stormwater will be conveyed from the road through kerbs and gutters to channel surface run-off into existing stormwater lines, or to catchpits and then to 375mm diameter outlet pipes, which would daylight into the Lotus Canal (Gibb, 2021). The stormwater management plan considers road run-off and intentionally directs it away from the Edith Stephens Nature Reserve (ESNR), and
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		<p>10. Contaminated stormwater must not be disposed of in the stormwater system as it will result in the contamination of water bodies and its disposal may also require analysis before disposal.</p> <p>11. All the requirements of the National Water Act, 1998 (Act 36 of 1998) in terms of water use and pollution control management must be adhered to at all times.</p> <p>12. Please note that this Department reserves the right to amend and/or add to the comments made above in the light of subsequent information received.</p> <p>Please do not hesitate to contact the above office should there be any queries.</p> <p>Yours Sincerely,</p> <p>REGIONAL HEAD: WESTERN CAPE Signed by: Nelisa Ndobeni Designation: Control Environmental Officer Date: 30 August 2021</p>		<p>toward the Lotus Canal (which already serves as a catchment for stormwater run-off). The overall stormwater management approach has been devised in accordance with the requirements of the biophysical specialists as well as a as the City of Cape Town Roads and Stormwater Branch Design and control measures for stormwater control have also been included in the EMPr.</p> <p>10. Stormwater will be channelled to the Lotus Canal which already serves as an acceptable catchment for stormwater runoff. There will be no discharge to water bodies and the system has specifically been designed to prevent stormwater run-off and discharge to the ESNR wetlands.</p> <p>11. The National Water Act has been considered throughout this Basic Assessment process.</p> <p>12. Noted.</p>
6.	Ellen Mazeka Jelly bees arts and culture and resident 1 September 2021	Good day i apologize I have the problem with my fone i ellen mazeka from jelly bees arts and culture I also supporting about My Citi by buses that will come in my community we really in need.	CHAND	Your support for the project is noted.
7.	Alvin L Cope Western Cape Government: Transport	Your e-mail of 26 August 2021, below, and accompanying documents.	CHAND	Noted.

	and Public Works Chief Directorate: Road Planning	This Branch, as far as your DBAR in terms of the NEMA is concerned, offers no objection to this IRT proposal on PMR 122. Formal comment on the traffic issues will be provided to the Local Authority in terms of their legislation.		
8.	Thomas Brian Brummer o.b.o Artova 2 Investments (Pty) Ltd Artova 2 Investments (Pty) Ltd 20 September 2021	We act for Artova 2 Investments, owner of Erf 40308 and 40311, Cape Town at Lansdowne. A portion of our client's property has been identified as required for the IRT development. A portion of land abutting Govan Mbeki Road has been identified for expropriation by the City. We note from the Scoping documents that the existing access points to our clients property will remain. This is a non-negotiable and the access must remain as is or be improved. We also point out that the property has a mixed zoning of GB1 and MU1. Any future development of the IRT must acknowledge the rights to develop in terms of these zones.	CHAND	Noted. The EAP can confirm that access to the highlighted properties will remain. The City of Cape will be contact with landowners should expropriation of land be required to allow for the proposed upgrades. This however falls outside the scope of this environmental application.
9.	Evodia Boonzaaier DEADP: Waste Management 28 September 2021	COMMENT ON THE PROPOSED IRT PHASE 2A TRUNK ROUTE: PORTION E1, 3.5KM OF GOVAN MBEKI ROAD FROM INTERSECTION WITH HEINZ/OTTERY ROAD TO APPROX 130M EAST OF LINK ROAD, MANENBERG & GUGULETHU Dear Madam 1. The above-mentioned document, as received by the Department of Environmental Affairs and Development Planning Directorate: Waste Management (the 'Department') on 26 August 2021, refers. 2. The Department has reviewed the documentation and wish to make the following comments: 2.1 The proposed development is close to waterbodies and the use of waste trapping as mitigation is noted, but avoidance should be	CHAND	2.1 Noted. Waste management and control measures have been included in the EMPr for strict implementation during the construction phase. An ECO would monitor compliance and penalties would come into play should waste management

		<p>considered alongside this. It must be noted that pollution often makes its way into these waterbodies when no proper waste system is accompanied by the development. Therefore, it is imperative that a waste management system be implemented and available for use during construction and operational phases.</p> <p>2.2 The cleared road pavement material must be properly managed. It is advised that this waste type be managed appropriately by following the waste hierarchy and includes the correct, secure fencing of the development to limit theft of these items and potential dumping of construction materials in the area. In addition, consider following the construction and demolition guideline developed by the DEA&DP to ensure that illegal dumping prohibited.</p> <p>2.3 Cleared vegetation waste should not be sent to landfill, but rather chipped and/or composted, either on-site or at a licensed facility. This is imperative to ensuring that the applicant / developer contributes towards the WCG's 50% diversion of organic waste from landfill by 2022 and 100% diversion by 2027.</p> <p>2.4 Waste management at all stages should focus on creating beneficiation opportunities for small local businesses.</p> <p>3. Please contact the Directorate: Waste Management should you have any enquiries regarding these comments.</p>		<p>specifications not be adhered to. The operational EMPr also requires regular collection of litter on the sidewalk and roadway and general housekeeping, as well, regular cleaning of gross pollutants such as plastic, paper, etc from the stormwater system along the road.</p> <p>2.2 Noted. The waste hierarchy is included in the EMPr. The site camp would be fenced as per the EMPr. Dumping is prohibited by the EMPr. Applicable specifications and definitions from the DEADP's guideline for construction and demolition have been included in the EMPr.</p> <p>2.3 This specification has been included in the EMPr.</p> <p>2.4 This specification has been included in the EMPr</p>
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		<p>Yours faithfully BELINDA LANGENHOVEN DEPUTY DIRECTOR: WASTE POLICY AND MINIMISATION DATE: 28 September 2021</p>		
10.	<p>City of Cape Town: Environment & Heritage Management Rashaad Samaai 30 September 2021</p>	<p>Email: Good day Claudette and Marielle</p> <p>Attached is the City's integrated comment on the above IRT proposal.</p> <p>The presentation of the information is commendable, and it was a pleasure reading the reports. However, Section 3.1 of the EMP makes reference to "Khayelitsha Bus depot" and I was wondering if this is a mistake.</p> <p>Regards Rashaad Samaai Environment Professional Officer: Environment & Heritage Management Branch, Environmental Management Department Spatial Planning and Environment Directorate</p> <p>INTEGRATED COMMENT ON THE POST-APPLICATION BASIC ASSESSMENT REPORT FOR THE PROPOSED IRT PHASE 2A TRUNK ROUTE: PORTION E1, 3.5KM OF GOVAN MBEKI ROAD FROM INTERSECTION WITH HEINZ/OTTERY ROAD TO APPROXIMATELY 130m EAST OF LINK ROAD, MANENBERG & GUGULETHU (DEA&DP REFERENCE: 16/3/3/1/A2/19/3040/21)</p> <p>The abovementioned post-application Basic Assessment Report (BAR) dated August 2021, has reference.</p> <p>The BAR was circulated to relevant City departments for comment. Comments were received from Heritage Resources, Roads Infrastructure Management, Electricity Generation Distribution, Recreation and Parks, Water and Sanitation and the Biodiversity Management Branch. No objections were received. Below is a summary/ key points of each department and</p>	CHAND	<p>Noted with thanks. The error has been corrected.</p> <p>Noted.</p>

		<p>detailed comments are attached under Appendix A.</p> <p>1. Electricity Generation & Distribution – Xavier Rosenberg Electricity Generation & Distribution supports the proposal in principle and notes that any changes to electricity infrastructure and services will be for the applicant's expense.</p> <p>2. Recreation and Parks – Jennifer Fabing, Sihle Jonas and Ashton Mouton Recreation and Parks supports the IRT proposal in principle and requires that the Master Landscape plan be amended to include the rehabilitation of Public Places and Open Spaces and a year's maintenance and management should be specified in the Environmental Management Programme.</p> <p>3. Road Infrastructure and Management (RI&M) – Fatiema Benjamin The Road Infrastructure and Management branch supports the IRT proposal in principle and requires that a full set of civil services plans, particularly roads and stormwater, are submitted to their office for evaluation and approval before construction drawings are finalised.</p> <p>4. Water and Sanitation (Bulk Services) – Ashiekah Salie The Department states that the proposal will impact a number of the bulk water and water reticulation infrastructure. Its therefore crucial that timely consultation take place with the relevant branches prior to the approval of final drawings.</p> <p>5. Biodiversity Management Branch – Dalton Gibb and Luzann Isaacs The Edith Stephen Nature Reserve (ESNR) is located along the proposed route and it contains seasonal</p>		<p>Noted.</p> <p>Kindly note that the Master Landscape plan is still a draft and that a final plan will be submitted to the City for approval prior to implementation. It is however not the mandate or responsibility of the Applicant – the CCT Transport Directorate- to rehabilitate and maintain Public Open Spaces. The site will mostly be confined to the existing road and road reserve. If the Department is referring to construction “scars” which might occur on public properties during the construction phase, the EMPr requires that such areas be rehabilitated (refer to Site Clean-Up and Rehabilitation section in Table 1).</p> <p>Noted. The Civil services plan will be submitted to the department outside of this environmental process.</p> <p>Noted. Consultation will be undertaken in the detail design phase outside of this environmental process.</p>
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	<p>wetlands and habitat for a number of threatened species which include waterfowl and amphibian species; reptiles and mammals; Isoetes capensis (which is a plant found nowhere else in the world) and the site has a German homestead that was built in the late 1800's. The applicant acknowledged the importance of the ESNR and adequately assessed the potential impacts of the proposal on the nature reserve. The Biodiversity Management Branch (BMB) supports Alternative 3 as it avoids the ESNR and the assessment showed that it is acceptable from a biodiversity perspective but recommends that the mitigation measures as contained in the BAR and EMPr, be updated to address the impact of street lighting on the nature reserve and that timely consultation with BMB takes place before final approval of drawings/plans relating to stormwater management, landscaping, rehabilitation, street lighting, fencing and the retaining wall.</p> <p>Lastly, it is advised that all references to Edith Stephens Wetland Park in the BAR and EMPr be changed to the Edith Stephens Nature Reserve.</p> <p style="text-align: center;">6. Environment & Heritage Branch - Rashaad Samaai (Environment) & Philip Smith (Heritage)</p> <p>Environment</p> <p>Specialist freshwater and botanical studies were undertaken to identify environmental resources in the study area which acknowledged the importance of the Edith Stephen Nature Reserve as a highly significant environmental resource. Alternative road proposals were identified and the assessment process showed that Alternative 3 is acceptable from a biodiversity perspective.</p> <p>EMS endorses the findings in the BAR and agrees that the mitigation measures, as contained in the BAR and EMPr, would mitigate the potential impacts on significant environmental resources.</p>		<p>Noted that Alternative 3 is supported. The EMPr has been updated to specify that street lighting must be directed away from the ESNR.</p> <p>The need for consultation with the BMB has been specified in the EMPr.</p> <p>Noted. The changes have been made.</p> <p>Noted.</p>
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		<p>Heritage The Heritage Resources Section has no objection to the proposal since the impact on heritage resources was satisfactorily addressed.</p> <p>My Department reserves the right to revise its comment based on new information received.</p> <p>Kind regards ANDY GREENWOOD Regional Manager: Southern Region Environmental Management Department</p> <p>City Parks</p> <p>Via Email dated 17 September 2021</p> <p>Please note the email comments, dated 17 September 2021, for both IRT's, viz., Along Govan Mbeki and Ottery Roads, below from Ashton Mouton serves as part of the formal comment, from the Recreation and Parks department:</p> <p>The IRT Ottery Road Strandfontein Road to M5:</p> <ul style="list-style-type: none">• The proposed IRT Ottery Road Strandfontein Road to M5 removal, transplantation and new planting of trees impacting the development is noted and restoration and rehabilitation of Public Places and Open Spaces should be reflected on the Master Landscape plan, as well as a year's maintenance and management that should also be stipulated in the Environmental Management Programme• A tree survey plan and Master Landscaping plan will be requested from the Landscape Architects for further detailed assessments at a later stage. <p>Post application BAR for the proposed IRT Phase 2A Section E1 along Govan Mbeki Road:</p> <ul style="list-style-type: none">• The proposed IRT Phase 2A Section E1 along Govan Mbeki Road removal,		<p>Noted.</p> <p>Noted.</p> <ul style="list-style-type: none">• This road section is not relevant to this proposal and environmental application <ul style="list-style-type: none">• Please refer to response to same comment above.
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		<p>transplantation and new planting of trees impacting the development is noted and restoration and rehabilitation of Public Places and Open Spaces should be reflected, on the Master Landscape plan, as well as a year's maintenance and management that should also be stipulated in the Environmental Management Programme.</p> <ul style="list-style-type: none"> • A tree survey plan and Master Landscaping plan will be requested from the Landscape Architects for further detailed assessments at a later stage <p>Sihle and Ashton's comment brought forward: Post application BAR for the proposed IRT Phase 2A Section E1 along Govan Mbeki Road:</p> <ul style="list-style-type: none"> • Most of the comments made on the BAR concerning the biodiversity aspect are mostly for Edith Stevens Nature reserve and the Biodiversity Management Branch has made extensive comments on this matter, therefore no need to further comment on Edith Stevens Nature reserve. • Most of the POS areas (1-RE) on the development IRT route have been highly degraded through uncontrolled wildfires, overgrazing of cattle, off-road driving, invasive alien grasses (<i>kikuyu</i>, etc) and alien species like <i>Acacia saligna</i>. • The area (1-RE) is very much degraded and the development won't have a significant impact on the remaining biodiversity (if any) found on this site <p>IRT Ottery road – Strandfontein Road to M5</p> <ul style="list-style-type: none"> • The proposed development will not have major impacts on the Bamboes vlei wetland biodiversity as the area has low levels of Biodiversity present on site however the development should adhere to the conditions within the EMP to not disturb the core wetland area • Prevention of wildfire during operations 		<ul style="list-style-type: none"> • Noted • Noted and agreed. • This road section is not relevant to this proposal and environmental application. • This road section is not relevant to this proposal and environmental application.
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		<p>Yours faithfully DIRECTOR: ELECTRICITY GENERATION AND DISTRIBUTION</p> <p>HERITAGE COMMENT</p> <p>Via Email dated 9 September 2021</p> <p>Heritage Western Cape provided the required final comment on 19 October 2016 stating that no further heritage studies were required as no heritage resources were anticipated to be impacted. Nevertheless, a heritage report was prepared which did identify the heritage resources in the area but concluded they would largely not be impacted, except for the remnant mature gum trees. However, replacement trees have been indicated in the landscape plans provided.</p> <p>Thus, as the required HWC comment has been obtained and the only heritage impact on existing trees will be mitigated with new tree planting, the Heritage Resources Section has no further comments or requirements for this application.</p> <p>Kind regards, Philip Smith Heritage Professional: Environment and Heritage Management Branch Environmental Management Department, Spatial Planning and Environment Directorate</p> <p>ROAD INFRASTRUCTURE AND MANAGEMENT</p> <p>20 September 2021</p> <p>PROPOSED IRT PHASE 2A SECTION E1 ALONG GOVAN MBEKI ROAD</p> <p>In principle, Transport: Road Infrastructure and Management offers no objection to the proposal provided that a full set of civil services plans, particularly roads and stormwater, are submitted</p>		<p>Noted.</p> <p>Noted. The necessary planning and building plan approvals will be submitted outside of this environmental application. The Stormwater Management Plan (refer to Appendix G (d)) would need to be approved by the City prior to</p>
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	<p>prior to building plan approval.</p> <p>All stormwater run-off shall be conveyed to the municipal stormwater system in accordance with an approved management plan and the management plan conforms to the overall master planning of the area.</p> <p>DEPARTMENT: WATER AND SANITATION</p> <p>WATER AND SANITATION COMMENT FOR THE POST APPLICATION DRAFT BAR FOR THE PROPOSED IRT PHASE 2A TRUNK ROUTE: PORTION E1 OF GOVAN MBEKI ROAD FROM INTERSECTION WITH HEINZ/OTTERY ROAD TO APPROX. 130M EAST OF LINK ROAD, MANENBERG AND GUGULETHU.</p> <p><u>BACKGROUND</u> This memorandum serves as a comment on the water and sewer network and bulk services affected in terms of the Environmental Impact Assessment Regulations promulgated in terms of the National Environmental Management Act of 1998 (no 107 of 1998), as amended on 8 December 2014.</p> <p>The applicant proposed the Integrated Rapid Transit (IRT) bus lanes as part of the IRT Phase 2A trunk route development. The focus area of this application for the Environmental Authorisation process comprises the proposed upgrades to Govan Mbeki Road / M9 from the corner of Heinz/Ottery Road to just beyond Link Road, approximately 3.5km to the east. See attached figures and submitted documents for the location of the affected stretch of road.</p> <p>This report provides an overview of the existing water and sewer infrastructure near the development.</p> <p><u>WATER RETICULATION</u> <u>Heinz/Ottery Road to Vygekraal/ Wye Road:</u> The City's water reticulation model indicates a 225</p>		<p>implementation, as stipulated by the EMPr.</p>
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	<p>mm Ø reticulation main along Heinz Road, northward of the Govan Mbeki (Lansdowne Road) from the intersection to Lonedown Road. On the south side of Govan Mbeki intersection with Heinz and Ottery Road is a 160 mm Ø and a 300 mm Ø reticulation main stretching south along the Ottery Road. Both these reticulation mains connect to the 300 mm Ø distribution bulk main (DBM). The 300 mm Ø DBM is an extension of a 450 mm Ø DBM laid along the stretch of Govan Mbeki Road from the intersection with Heinz and Ottery Road to Vygekraal and Wye Road (or Jakes Gerwel Drive (former Vanguard Drive) off ramp</p> <p>See Figure 1 and 2 for the existing water infrastructure layout.</p> <p><u>Vygekraal/ Wye Road to Duinefontein Road:</u> There are four reticulation mains on the affected stretch of Govan Mbeki Road from the Vygekraal and Wye Road intersection to Duinefontein Road. These include a 150 mm Ø reticulation main and a 535 mm Ø DBM laid along or parallel M9 lanes. The last two pipes are 300 mm Ø DBM laid across M9 approximately 40 m before Duinefontein Road, and lastly, a 500 mm Ø DBM crossing along the Duinefontein Road alignment. See Figure 2 and 3 for the existing water infrastructure layout.</p> <p><u>Duinefontein Road to Link Road:</u> There is a 300 mm Ø DBM parallel to the northern boundary of the affected stretch of Govan Mbeki Road from Duinefontein Road to Link Road. Except for the supply of 150 mm Ø reticulation main and the 535 mm Ø DBM, the 300 mm Ø DBM supply two more reticulation mains along the affected stretch of Govan Mbeki Road from Duinefontein Road to Link Road. These include a 110 mm Ø reticulation connection main crossing Govan Mbeki Road from the node on the southern boundary of Erf 8057, Gugulethu. The last connection is a 300 mm Ø DBM crossing Govan Mbeki Road from the node on Erf 1-RE, parallel to the southern boundary of Erf</p>		
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	<p>15488, Gugulethu. The last connection is a closed 350 mm Ø DBM along the Link Road alignment; this may need to be confirmed. See Figure 4, 5 and 6 for the existing water infrastructure layout.</p> <p><u>BULK WATER</u> There is a 1500 mm Ø bulk water main (at the intersection of Govan Mbeki Road with Vygekraal and Wye Road) crossing Govan Mbeki Road along the north/south alignment parallel to the Vygekraal Road. There is also an 815 mm Ø bulk water main traversing Erven 48-RE (Lotus River pedestrian bridge) and 332. Erven 48-RE and 332 are abutting the northern boundary of Govan Mbeki Road, and both erven are within 241 m from Duinefontein Road. The 815 mm Ø bulk water main extends along the Govan Mbeki Road for the entire affected stretch and beyond. See all attached figures.</p> <p><u>SEWER RETICULATION</u> The City of Cape Town's sewer reticulation model indicates no sewer infrastructure within the proposed development area. See Figure 7 for the existing sewer infrastructure layout.</p> <p><u>CONCLUSION</u> There is extensive water infrastructure affected by the proposed IRT Phase 2A Trunk route development. This development will affect a number of the bulk water and water reticulation infrastructure, which requires necessary precautionary measures and involvement of the affected branches within the City of Cape Town.</p> <p><u>General/ Disclaimer</u> Information provided is based on the best available data.</p> <p>Yours Faithfully 9/28/2021 X Signed by: Ashiekah Salie On behalf of</p>		<p>All Noted.</p>
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		Zolile Basholo TECHNICAL SERVICES DIRECTOR: WATER & SANITATION DEPARTMENT		
11.	Naadiya Wookey DEADP Development Management (Region 1) 3 September 2021	Dear Sir ACKNOWLEDGEMENT OF RECEIPT OF THE APPLICATION FORM FOR BASIC ASSESSMENT FOR THE PROPOSED INTEGRATED RAPID TRANSPORT PHASE 2A TRUNK ROUTE: PORTION E1, ALONG 3.5KM OF GOVAN MBEKI ROAD FROM INTERSECTION WITH HEINZ/OTTERY ROAD TO APPROXIMATELY 130M EAST OF LINK ROAD, MANENBERG AND GUGULETHU. <ol style="list-style-type: none"> 1. The application form dated and received by this Department via electronic mail correspondence on 24 August 2021, refer. 2. This letter serves as an acknowledgement of receipt of the aforementioned document by this Directorate. 3. Applicable listed activities 	CHAND	

		<p>3.1 Since the proposed route will be located on land zoned as Open Space, the applicability of activity 15 of Listing Notice 3 of the NEMA EIA Regulations, 2014 (as amended) must be confirmed.</p> <p>3.2 Should the aforementioned listed activity be triggered by the proposed development, a duly signed and dated amended application for environmental authorisation must be submitted along with the BAR.</p> <p>3.3 You are reminded that only those activities applied for will be considered for authorisation. The onus is on the applicant to ensure that all of the applicable listed activities are applied for and assessed as part of the EIA process. Failure to include any applicable listed activities may invalidate the application.</p> <p>4. Screening Report and Protocols</p> <p>4.1 Screening Report</p> <p>4.1.1 Based on the Screening Report (generated from the Screening Tool developed by the National Department of Environmental Affairs and dated 17 June 2021 for the categories: Infrastructure-Transport Services; and Activities within or close to a watercourse),</p>		<p>3.1 Noted. This Listed Activity has since been contemplated by the EAP and reference thereto made in the BAR. It can be confirmed that the Activity does not trigger. It is noted that there would be encroachment into land zoned as open space, however these "lithers along the road (i.e not entire properties) would be "transformed " for transport use and not for any of the land-uses listed by the activity (i.e. residential, retail, commercial, industrial or institutional use). As such this activity is not triggered. The widening of the road into public open spaces is furthermore more fittingly described by Listed Activity 18 of Listing Notice 3, which has been applied for and for which associated impacts have been assessed by the Basic Assessment.</p> <p>3.2 The aforementioned activity does not trigger, as such and amended application will not be submitted.</p> <p>3.3 Noted. All applicable activities have been included in the application.</p> <p>4.1.1 Noted and agreed.</p>
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		<p>it is noted that the proposed site is located within a very high sensitivity area from an agricultural perspective, a high sensitivity area from an animal species perspective, a very high sensitivity area from an aquatic biodiversity perspective, a low sensitivity area from an archaeological and cultural heritage perspective, a very high sensitivity area from a civil aviation perspective, a medium sensitivity area from a defence perspective, a medium sensitivity area from a paleontological perspective, a high sensitivity area from a plant species perspective and a very high sensitivity area from a terrestrial biodiversity perspective.</p> <p>4.1.2 In addition, the Screening Report identified the following specialist studies to be undertaken:</p> <p>4.1.2.1 An Agricultural Impact Assessment;</p> <p>4.1.2.2 A Landscape/Visual Assessment;</p> <p>4.1.2.3 An Archaeological and Cultural Heritage Assessment;</p> <p>4.1.2.4 A Palaeontological Assessment</p> <p>4.1.2.5 A Terrestrial Biodiversity Assessment;</p> <p>4.1.2.6 An Aquatic Biodiversity Assessment;</p> <p>4.1.2.7 A Noise Impact Assessment;</p> <p>4.1.2.8 A Hydrology Assessment;</p> <p>4.1.2.9 A Traffic Impact Assessment;</p> <p>4.1.2.10 A Geotechnical Assessment;</p> <p>4.1.2.11 A Socio-Economic</p>		<p>4.1.2. Noted and agreed.</p>
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		<p>Assessment;</p> <p>4.1.2.12 An Ambient Air Quality Impact Assessment;</p> <p>4.1.2.13 A Plant Species Assessment; and</p> <p>4.1.2.14 An Animal Species Assessment.</p> <p>4.1.3 This Directorate notes in your application form, that the following specialist assessments / reports will be submitted with the BAR:</p> <p>4.1.3.1 Freshwater Impact Assessment;</p> <p>4.1.3.2 Botanical Impact Assessment;</p> <p>4.1.3.3 Heritage study; and</p> <p>4.1.3.4 Stormwater Management Plan.</p> <p>4.1.4 Please note that motivation as why all other specialist assessment identified as part of the Screening Tool Reports (dated 17 June 2021) will not be undertaken, has not been provided by the EAP.</p> <p>4.1.5 In light of the fact that the proposed development may potentially have significant traffic impacts within the area, specialist input may therefore required.</p> <p>4.2 Protocols</p> <p>4.2.1 Please note that the Protocols for the animal species and noise environmental themes have</p>		<p>4.1.3 Correct.</p> <p>4.1.4 A Site Sensitivity Verification Report and accompanying motivation has since been prepared. Please refer to Appendix I of the BAR.</p> <p>4.1.5. Part of the purpose of the proposal is to improve traffic conditions. The proposed draft plans have been compiled by transport engineers who are specialists in their subject matter. The designs comply with the various policies and guidelines relevant to transport and road design. The proposed activities are also already aligned with the City of Cape Town objectives for transport infrastructure as it is located on a MyCiti Future Network in terms of the MSDF. Traffic Impacts have been assessed by the EAP in the BAR and would result in a positive impact to traffic conditions in the area (as intended). Specialist input is deemed unnecessary and it is noted that a further request for a Traffic Impact Assessment was not made in response to the BAR.</p> <p>4.2.1. Noted. Animal Species and Noise Impact Assessments were not undertaken but reference to the protocols have been corrected.</p>
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		<p>come into effect on 30 October 2020 (Government Gazette No. 43855).</p> <p>4.2.2 Although motivation as to why certain studies will not be conducted has been included in the application for environmental authorisation, a site sensitivity verification report must be submitted along with the draft BAR (as required in accordance with the Protocols). Further comment on the site sensitivity verification report will be provided along with the comment on the draft BAR.</p> <p>4.3 Please note that where a specialist assessment is required, but no specific environmental theme protocol has been prescribed, the level of assessment must be based on the findings of the site verification and must comply with Appendix 6 of the NEMA EIA Regulations, 2014 (as amended).</p> <p>5. Exemptions</p> <p>5.1 It is evident that you do not intend to apply for exemption from any provisions contained in the NEMA or the EIA Regulations, 2014 (as amended).</p> <p>6. Content of a Basic Assessment Report ("BAR")</p> <p>6.1 You are referred to Appendix 1 of the NEMA EIA Regulations, 2014 (as amended) for the requirements with respect to the 'Content of basic assessment reports'.</p> <p>7. Alternatives</p> <p>7.1 Be advised that in terms of the NEMA EIA Regulations, 2014 (as amended)</p>		<p>4.2.2 A Site Sensitivity Verification Report has been completed and included in the Final BAR. Refer to Appendix I of the BAR.</p> <p>4.3 Noted.</p> <p>5.1 Correct.</p> <p>6.1 Noted.</p> <p>7.1 Noted. Alternatives have been identified and assessed by the BA process.</p>
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		<p>and the NEMA the investigation of alternatives is mandatory. All alternatives identified must therefore be investigated to determine if they are feasible and reasonable. In this regard it must be noted that the Department may grant authorisation for an alternative as if it has been applied for or may grant authorisation in respect of all or part of the activity applied for as specified in Regulation 20 of the NEMA EIA Regulations, 2014 (as amended). Alternatives are not limited to activity alternatives, but include layout alternatives, design, activity, operational and technology alternatives. Every EIA process must therefore identify and investigate alternatives, with feasible and reasonable alternatives to be comparatively assessed. If, however, after having identified and investigated alternatives, no feasible and reasonable alternatives were found, no comparative assessment of alternatives, beyond the comparative assessment of the preferred alternative and the "no-go" alternative, is required during the assessment. What would, however, be required in this instance is that proof of the investigation undertaken and motivation indicating that no reasonable or feasible alternatives other than the preferred and the "no-go" alternatives exist must be provided to the Directorate.</p> <p>8. Public Participation</p> <p>8.1 Please be advised that the requirements of the public participation process ("PPP") are specified in Regulation 41(2) of the NEMA EIA Regulations, 2014 (as amended).</p>		<p>8.1 Noted.</p>
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		<p>8.2 This Directorate notes that a copy of the approved Public Participation Plan dated 21 December 2020 (Ref. No. 16/3/3/6/7/1/A2/19/3028/18 and 16/3/3/6/A2/19/3042/19) has not been provided along with the application form. You are advised that a copy of the approved Public Participation Plan must be provided along with site sensitivity verification report.</p> <p>8.3 The BAR must be made available to the Interested and Affected Parties ("I&APs"), including all the relevant State Departments that administer laws relating to a matter affecting the environment, for comment for a minimum period of 30 days.</p> <p>8.4 Although a comment from Heritage Western Cape (dated 19 October 2016) has been provided, an updated statement will be required from Heritage Western Cape to confirm whether the aforementioned comment is still relevant and must be included in the BAR.</p> <p>8.5 Documentation must be submitted via email to the case officer, with attached pdf versions of the report or, if too large to attach to an email, to be made available via an electronic link provided in the email that is accessible by the Directorate. The Directorate may require that a hard copy of the reports also be submitted to the Department by a certain date, but will advise you accordingly</p> <p>8.6 Please note that all proof of having conducted the Public Participation Process in terms of Chapter 6 of the Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) must be supplied to this Department.</p> <p>8.7 Please be reminded that the Public</p>		<p>8.2 A copy of the Public Participation Plan has been included in the BAR and provided to the Department.</p> <p>8.3 The BAR was made available to I&APs and State Department from 27 August – 1 October. Proof of distribution is included in Appendix F of the BAR.</p> <p>8.4 This has been obtained from Heritage Western Cape. Please refer to Appendix E1 of the BAR. HWC have confirmed that their comment still stands.</p> <p>8.5 Noted.</p> <p>8.6 Proof of PPP is included in Appendix F of the BAR.</p> <p>8.7 Noted and confirmed.</p>
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		<p>Participation Process must fulfil the requirements outlined in Chapter 6 of the EIA Regulations, 2014 (as amended), and must take into account any applicable guidelines published in terms of Section 24J of the National Environmental Management Act, 1998 (Act No. 107 of 1998), this Department's Circular EADP 0028/2014 on the "One Environmental Management System" and the EIA Regulations, 2014 (as amended), as well as any other guidance provided by this Department.</p> <p>9. Need and Desirability</p> <p>9.1 In terms of the NEMA EIA Regulations, 2014 (as amended), when considering an application, the Directorate must take into account a number of specific considerations including, inter alia, the need for and desirability of any proposed development. As such, the need for and desirability of the proposed activity must be considered and reported on in the BAR. The BAR must reflect how the strategic context of the site in relation to the broader surrounding area, has been considered in addressing need and desirability.</p> <p>10. Environmental Management Programme ("EMPr")</p> <p>10.1 In accordance with Section 24N of the NEMA and Regulation 19 of the NEMA EIA Regulations, 2014 (as amended) the Directorate requires the submission of an EMPr. The contents of such an EMPr must meet the requirements outlined in Section 24N of the NEMA (as amended) and Appendix 4 of the NEMA EIA Regulations, 2014 (as amended). The EMPr must address the</p>		<p>9.1 This is discussed in the BAR.</p> <p>10. 1 Noted. The EMPr is attached as Appendix H of the BAR.</p>
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		<p>potential environmental impacts of the activity throughout the project life cycle, including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing). The EMPr must be submitted together with the BAR.</p> <p>11. General</p> <p>11.1 In addition to the above requirements, you must clearly show how the proposed development complies with the principles contained in Section 2 of the NEMA and must also show how the proposed development meets the requirements of sustainable development.</p> <p>11.2 In accordance with Regulation 19(1) of the NEMA EIA Regulations, 2014 (as amended), the final BAR must be submitted within 90 days of receipt of the application by the Department, calculated from 24 August 2021. Therefore, the final BAR must be submitted to this Department by 23 November 2021. Further note, in terms of Regulation of the NEMA EIA Regulations, 2014 (as amended), an application in terms of the NEMA EIA Regulations, 2014 (as amended) lapses and the competent authority will deem the application as having lapsed, if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless extension has been granted in terms of Regulation 3(7).</p> <p>11.3 Please note that the activity may not commence prior to obtaining an Environmental Authorisation. It is an offence for a person to commence with a listed activity unless the competent authority has granted an</p>		<p>11.1 Noted. This has been addressed in the BAR.</p> <p>11.2 Noted.</p> <p>11.3 Noted.</p>
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		<p>Environmental Authorisation for the undertaking of the activity.</p> <p>12. Kindly quote the above-mentioned reference number in any future correspondence regarding this application.</p> <p>The Directorate reserves the right to revise or withdraw comments or request further information based on any information received.</p> <p>Yours faithfully p.p. _____ MR ZAAHIR TOEFY DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)</p>		<p>12. Noted.</p>
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13.	<p>Naadiya Wookey DEADP Development Management (Region 1) 30 September 2021</p>	<p>Dear Sir</p> <p>COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (“BAR”) FOR THE PROPOSED INTEGRATED RAPID TRANSPORT PHASE 2A TRUNK ROUTE: PORTION E1, ALONG 3.5KM OF GOVAN MBEKI ROAD FROM INTERSECTION WITH HEINZ/OTTERY ROAD TO APPROXIMATELY 130M EAST OF LINK ROAD, MANENBERG AND GUGULETHU.</p> <ol style="list-style-type: none"> 1. The draft BAR dated 26 August 2021 and received by this Department via electronic mail correspondence on 27 August 2021 and this Directorate's acknowledgement thereof dated 03 September 2021, refer. 2. Comments on the pre-application draft BAR are as follows: <ol style="list-style-type: none"> 2.1 Applicable Listed Activities <ol style="list-style-type: none"> 2.1.1 In accordance with this Directorate's previous correspondence (dated 03 September 2021), confirmation of the applicability of Activity 15 of Listing Notice 3 of the NEMA EIA Regulations, 2014 (as amended) was requested. You are required to provide confirmation with respect to the information requested as a matter of urgency. 2.1.2 Page 37 of the draft BAR indicates that Activities 14 and 18 of Listing Notice 3 of the NEMA EIA Regulations, 2014 (as amended) have been contemplated and does not apply. However, page 35 of the draft BAR indicates that Activity 18 of Listing Notice 3 of the NEMA EIA Regulations, 2014 (as amended) has been included and is applicable. 	<p>CHAND</p>	<ol style="list-style-type: none"> 2.1.1 This Listed Activity has since been contemplated by the EAP and reference thereto included in the BAR. Note that the Activity is not triggered and is thus not applicable to the proposal. 2.1.2 This error has been corrected.
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		<p>Please correct this error.</p> <p>2.1.3 You are reminded that should Activity 15 of Listing Notice 3 of the NEMA EIA Regulations, 2014 (as amended) be triggered by the proposed development, a duly signed and dated amended application for environmental authorisation must be submitted along with the BAR.</p> <p>2.2 Screening Report and the Protocols</p> <p>2.2.1 In accordance with this Directorate's previous correspondence (dated 03 September 2021), you were requested to provide a site sensitivity verification report in accordance with the Protocols. A site sensitivity verification report must therefore be provided.</p> <p>2.2.2 You are reminded that the Protocols for the animal species and noise environmental themes have come into effect on 30 October 2020 (Government Gazette No. 43855). Please update the BAR accordingly.</p> <p>2.3 Potential impacts</p> <p>2.3.1 In accordance with the information contained in the draft BAR and Appendix C of the draft BAR, it is evident that the relocation of illegal kerbside informal settlements may occur as a result of the proposed development. The potential social impacts</p>		<p>2.1.3 It has been determined that this Activity does not trigger as such an amended application will not be submitted.</p> <p>2.2.1 A Site Sensitivity Verification Report has been provided (Refer to Appendix I of the BAR).</p> <p>2.2.2 Noted. The BAR has been updated accordingly.</p> <p>2.3.1 The applicant and EAP engaged with DEADP to obtain clarity on this comment. The following was instructed as per email sent by Ms. N Wookey on 15 November 2021:</p> <p><i>"Dear Claudette / Sadia,</i></p> <p><i>Thank you for the discussion opportunity provided during our meeting earlier today.</i></p> <p><i>Please note that after internal discussion and consideration, it</i></p>
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		<p>associated with the proposed development must be assessed and reported on.</p> <p>2.4 Site Development Plan 2.4.1 The site development plan (compiled by Gibb (Pty) Ltd. and dated August 2017) must be updated to include the proposed stormwater management infrastructure and the designated site camp for the construction</p>		<p>was agreed that a notification to registered I&APs regarding the explanation / clarification of the process to be followed with respect to the existing illegal structures within the route of the proposed development, (in addition to other points / comments raised) will be sufficient in satisfying the comments / concerns highlighted in this Directorate's correspondence dated 30 September 2021. Therefore, the additional information relating to the highlighted social impact is not considered significant new information and does not warrant a revised BAR and additional round of Public Participation.</p> <p>Kindly be advised that the above arrangement is only relevant to this Directorate's correspondence dated 30 September 2021 and is not inclusive of any other input / comment or request raised by other I&APs.</p> <p>You are reminded that should there have been significant new / material information or request thereof added to the BAR, the applicant / EAP must notify the Department that an additional 50 days would be required for the submission of the BAR inclusive of a 30-day public participation process prior to the deadline of submission of the final BAR. Should this not be the case, you are further reminded that the BAR must be submitted within 90 days of the date of receipt of the application by the Department. The deadline for the submission of the BAR is therefore 23 November 2021.</p> <p><i>I trust the above provides clarity on the matter."</i></p> <p>The required notification letter was sent to the I&AP database on 23 November and is included in Appendix F of the BAR.</p> <p>2..4.1 The proposed stormwater infrastructure is included in the Stormwater Management Plan (refer to Appendix G (d) of the BAR). The location of the site camp will only be confirmed in the construction phase however a potential low-impact site has been identified and included in the EMPr. The final site determination will be made by the ECO in conjunction with the contractors, guided by the EMPr.</p>
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		<p>phase should this information be readily available.</p> <p>2.5 Public Participation</p> <p>2.5.1 In accordance with this Directorate's previous correspondence (dated 03 September 2021), although a comment from Heritage Western Cape (dated 19 October 2016) has been provided, an updated statement will be required from Heritage Western Cape to confirm whether the aforementioned comment is still relevant and must be included in the BAR.</p> <p>2.5.2 Confirmation from the Department of Water and Sanitation with respect to the recommendation made by the freshwater specialist that a wetland offset is not required must be provided in the BAR.</p> <p>2.5.3 Should the proposed development require the relocation of an informal settlement, input from the Department of Human Settlements must be obtained.</p> <p>2.5.4 Proof of the Public Participation Process undertaken must be included in the BAR. The proof must include comments received from the commenting authorities and from other I&APs, together with the responses made to</p>		<p>2.5.1 This has been obtained and included in the BAR (refer to Appendix E1 of the BAR). HWC have confirmed that their comment still stands.</p> <p>2.5.2 The DWS did not instruct wetland offsets in response to the Draft BAR (refer to Appendix E3 for the original comment).</p> <p>2.5.3 The WC: Department of Human Settlement were notified of the availability of the Draft BAR during the 35-day public review period. A second request for comment was made on 1 October 2021, and a third on 6 October 2021. (Refer to Appendix F for proof of attempts). At the time of submitting this report the Department had not provided comment despite multiple attempts by the EAP.</p> <p>2.5.4 Proof of PPP undertaken is included in Appendix F. All comments received on the proposal have been captured and responded to in a Comments & Responses Report and incorporated into the BAR where needed. Original comments have also been submitted to the Department.</p>
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		<p>the comments.</p> <p>2.6 Environmental Management Programme ("EMPr")</p> <p>2.6.1 You are reminded that the various applicable recommendations made by the relevant specialists must be specified and included as mitigation measures in the EMPr and provided as part of the BAR to the competent authority.</p> <p>2.7 General</p> <p>2.7.1 Throughout the draft BAR it is indicated that Alternative 3 is the preferred alternative, however reference to Alternative 1 is included in the activity description as the preferred alternative. Please correct this error.</p> <p>2.7.2 Several repetitions of some specialist reports have been packaged into the draft BAR. Please correct this error.</p> <p>3 You are reminded that the BAR must be submitted within 90 days of the date of receipt of the application by the Department. The deadline for the submission of the BAR is therefore 23 November 2021.</p> <p>4 Should the outstanding information requested above result in significant changes or significant new information having been added to the BAR, the applicant/EAP must notify the Department that an additional 50 days (i.e. 140 days from receipt of the application) would be required for the submission of the BAR. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information.</p>		<p>2.6.1 All specialist recommendations have been included in the BAR & EMPr.</p> <p>2.7.1 This error has been corrected.</p> <p>2.7.2 This has been corrected.</p> <p>3. Noted.</p> <p>4. Changes to the Draft BAR have been underlined in the Final BAR for ease of reference. Changes include reference to the PPP undertaken, comments received on the Draft BAR and additional mitigation measures which have been added to the EMPr, as per comments from State Departments. These additions/amendments to the BAR & EMPr are not deemed as significant. The Listed Activities applied for, impact assessments and outcomes of the BA process have remained the same.</p>
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		<p>5 Please note that the activity may not commence prior to an Environmental Authorisation being granted by the Department. It is an offence for a person to commence with a listed activity unless the competent authority has granted an Environmental Authorisation for the undertaking of the activity.</p> <p>6 Kindly quote the abovementioned reference number in any future correspondence regarding this application.</p> <p>The Directorate reserves the right to revise or withdraw comments or request further information based on any information received. Your interest in the future of our environment is greatly appreciated.</p> <p>Yours faithfully MR. ZAAHIR TOEFY DIRECTOR: DEVELOPMENT MANAGEMENT (REGION1)</p>		<p>5. Noted</p> <p>6. Noted.</p> <p>Noted.</p>
14.	<p>Sibusiso Sinuka DEADP Directorate: Air Quality Management 1 October 2021</p>	<p>COMMENT ON THE POST APPLICATION DRAFT BASIC ASSESSMENT REPORT (DBAR) AND ENVIRONMENTAL MANAGEMENT REPORT (EMPr) FOR THE PROPOSED INTEGRATED RAPID TRANSPORT PHASE 2A TRUNK ROUTE ON PORTION E1, 3.5KM OF GOVAN MBEKI ROAD FROM INTERSECTION WITH HEINZ/OTTERY ROAD TO APPROXIMATELY 130M EAST OF LINK</p>	<p>CHAND</p>	

		<p>ROAD CAPE IN THE CITY OF CAPE TOWN METROPOLITAN MUNICIPALITY, WESTERN CAPE PROVINCE.</p> <p>The post application DBAR and EMPr report for the above-mentioned project, dated August 2021, which was received by the Department of Environmental Affairs and Development Planning (DEA&DP), has reference.</p> <p>The Directorate: Air Quality Management (D: AQM) has the following comments on the post application DBAR in terms of the National Environmental Management: Air Quality Act No. 39 of 2004 (NEM: AQA):</p> <p>1. DUST CONTROL MANAGEMENT</p> <p>1.1 It is noted in the post application DBAR that the impacts of dust pollution will be low to very low and of temporary significance during the construction phase.</p> <p>1.2 Potential dust may be created from vegetation clearance, excavation operations and leaving of large areas of land bare.</p> <p>1.3 Mitigations stipulated in the EMPr must be strictly adhered to in order to mitigate any possible dust pollution.</p> <p>1.4 Dust generated from all the phases of the proposed activities must comply with the NEM: AQA, National Dust Control Regulations (Government Notice No. R. 827) of 1 November 2013. It is noted that:</p> <p>1.4.1 These regulations prohibit a person from conducting any activity in such a way as to give rise to dust in such quantities and concentrations that the dust, or dust fallout, has a detrimental effect on the environment, including human health.</p> <p>2 NOISE CONTROL MANAGEMENT</p>		<p>1.1 Noted</p> <p>1.2 Noted and agreed.</p> <p>1.3 Noted and agreed.</p> <p>1.4 Noted. This is included in the EMPr.</p>
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		<p>2.1 It is noted that:</p> <p>2.1.1 the proposed development (widening of the existing road) is not likely to have significant noise increases in terms of traffic/vehicular use, given that the current stretch of Govan Mbeki Road is a major road which already experiences significant vehicular traffic.</p> <p>2.1.2 the additional lanes and facilities themselves would also not emit any noise, and the construction phase noise would be short term and controlled through measures included in the EMPr.</p> <p>2.2 The D: AQM therefore recommends that construction activities' mitigation measures be strictly adhered to as per the EMPr.</p> <p>2.3 Noise generated on site from all the proposed activities must comply with the Western Cape Noise Control Regulations Provincial Notice 200/2013.</p> <p>3 AIR EMISSIONS IMPACT MANAGEMENT</p> <p>3.1 Potential air emissions will be in the form of dust from construction activities as well as from exhaust pipes of the machines operated on site.</p> <p>3.2 All potential air pollutants on site must be monitored and if causing significant emissions must be mitigated strictly as per the EMPr.</p> <p>4 GENERAL</p> <p>4.1 The Department would like to draw your attention to Section 28 of the National Environmental Management Act No. 107 of 1998 (NEMA), i.e. "Duty of Care" which states that: "Every person who causes, has caused or may cause significant pollution or degradation</p>		<p>2.1 Noted and agreed.</p> <p>2.2 Noted</p> <p>2.3 Noted and included in the EMPr.</p> <p>3.1 Noted and agreed.</p> <p>3.2 Noted.</p> <p>4.1 Noted.</p>
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		<p>of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorized by law or cannot reasonably be avoided or stopped, to minimize and rectify such pollution or degradation of the environment.”</p> <p>Kindly be informed that the D: AQM reserves the right to review the above-mentioned comments, should additional information come to light. Please contact Mr. Peter Harmse on 021 483 8343 or Peter.Harmse@westerncape.gov.za, should you have any further queries in this regard.</p> <p>Yours faithfully, PETER HARMSE HEAD OF COMPONENT: AIR QUALITY REGULATORY SERVICES</p>		
15.	Waseefa Dhansay HWC 1 October 2021	HWC's comment as dated 19 October 2016 is still applicable.	CHAND	Noted.
16.	Ismat Adams Cape Nature 4 October 2021	<p>RE: POST APPLICATION DBAR – PROPOSED IRT PHASE 2A TRUNK ROUTE: PORTION E1, 3.5KM OF GOVAN MBEKI ROAD FROM INTERSECTION WITH HEINZ/OTTERY ROAD TO APPROX 130m EAST OF LINK ROAD, MANENBERG & GUGULETHU</p> <p>DEA&DP Ref: 16/3/3/1/A2/19/3040/21 Consultant Ref: 03040</p> <p>CapeNature would like to thank you for the opportunity to comment on this application. Our comments are as follows.</p> <ol style="list-style-type: none"> 1. It is understood that the preferred alternative (alternative 3), will avoid all wetland areas and run adjacent to these wetlands except at the section adjacent to Edith Stephens Nature Reserve (ESNR). Wetlands will be encroached within the road servitude adjacent to ESNR, but the development will not breach the boundary of ESNR. It is further understood, 	<p>CHAND</p> <p>NCC ENVIRONMENTAL SERVICES (S Altern)</p>	1. Noted.

		<p>as per the botanical assessment, that the indigenous vegetation to be impacted is mostly highly degraded and transformed with only sporadic patches of highly degraded taxa of Cape Flats Sand Fynbos and Cape Flats Dune Strandveld occurring.</p> <p>2. The encroachment on the wetland vegetation adjacent to ESNR and removing the current buffer zone provided by the road reserve will have edge effects on ESNR wetland function, which will affect the threatened taxa on the periphery of ESNR, as mentioned in the FGM minutes provided. A wetland offset for the portion of wetland buffer to be destroyed should be provided, which could possibly be used to increase ecological resilience along the affected edge of ESNR. This would require input from a botanical specialist and wetland rehabilitation specialist. We agree with the insertion of a dyke at the boundary of ESNR to hydrologically separate ESNR from the development and supplement the effect of the stormwater management design that will move stormwater away from ESNR.</p> <p>3. If entire degraded patches of Cape Flats Sand Fynbos and Cape Flats Dune Strandveld will be cleared, then a biodiversity offset would be appropriate considering the conservation status of the vegetation types. An offset would not be appropriate in areas that are mostly transformed with only sporadic remnant indigenous vegetation. If entire patches of degraded Cape Flats Sand Fynbos and Cape Flats Dune Strandveld will be cleared, considering the small area to be cleared and degraded nature, financial offsets could be appropriate in this case.</p>		<p>2. While wetland offsets were initially discussed, it should be noted that the proposed geometry for the preferred alternative (i.e., Alternative 3) has been realigned and further narrowed to avoid wetlands. The impact has been assessed and confirmed to be low by a freshwater specialist (Belcher et al, 2021). No offsets are thus considered necessary. The DWS has also not called for a wetland offset (refer to Appendix E3).</p> <p>See following response regarding the loss of the buffer zone adjacent to the ESNR.</p> <p>3. Approximately 100m² of Cape Flats Dune Strandveld, and approximately 200m² of Cape Flats Sand Fynbos would be cleared, however the state of vegetation in these areas is highly degraded or completely transformed (Altern, 2021) and holds little ecological value. As such, these botanical impacts for the preferred Alternative were all found to be low (-) and no offsets are deemed necessary. While edge effect on the ESNR border edge was assessed to hold a medium (-) impact, development along this stretch takes place almost entirely with the designated road reserve which is, along with the areas outside of this road reserve, of very poor degraded quality. The only real loss in this area would be of the buffer which is limited and generally comprising exotic grass (Altern, 2021).</p>
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