



D-3 COMMENT AND RESPONSE REPORT

PROPOSED REZONING, SUBDIVISION AND DEVELOPMENT OF A MIXED USE DEVELOPMENT ON FARM CUMBERLAND NO. 915, SIMONDIUM, WESTERN CAPE PROVINCE.

Issues / comment raised by:	Date	Means of communication	Issue / comment	Response
«Name»	«Date_of_Comms»	«Means_of_Comms»	«Comment»	«Response»
Philippa Huntley	25 November 2018	Email	<p>CapeNature would like to thank you for the opportunity to comment on the above application and wish to make the following comments. Please note that our comments pertain only to the biodiversity related impacts and not to the overall desirability of the application:</p> <p>1. The Western Cape Biodiversity Spatial Plan (WCBSP) of 2017 indicates a terrestrial Critical Biodiversity Area (CBA1) mapped in the western corner of the property. The WCBSP indicates that the reasons behind mapping the CBA in this area is to protect a threatened vegetation type and for water source protection. The location of the CBA is correctly reflected in the maps in the botanical assessment report. However the BAR should reflect a more comprehensive consideration of the WCBSP and the implications of the CBA and ESA (Ecological Support Area) (see point 4 below) on site. The ESA status should be indicated under point 6a of the</p>	<p>The CBA and the ESA classification was mapped <u>due to the status of the vegetation which would naturally have occurred, namely Swartland Alluvium Fynbos</u>. The WCBSP indicates that the reasons behind mapping the CBA in this area is to <u>protect a threatened vegetation type and for water source protection</u>.</p> <p><u>As a result of this classification and the reason for this classification it was subsequently decided that a Freshwater Impact Assessment would also be conducted on site in</u></p>

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			<p>BAR and the discussion should include reference to ESA and CBA status including the reasons for this classification (as indicated below).</p> <p>2. In terms of botanical impacts, the mapped natural vegetation for the area is Swartland Alluvium Fynbos. As noted above this feature is one of the reasons for the CBA in this area. This vegetation type is classified as Critically Endangered according to criterion A1: Irreversible loss of natural habitat. This has been correctly referenced in the Botanical Specialist Report. In response to the discussion under point 6a (Biodiversity) of the BAR: more information on CBA and ESA status and management guidelines is available in both the Biodiversity Spatial Plan Handbook and the associated online maps available on SANBI's BGIS website. The WCBSP is a product of CapeNature and DEA&DP and is used as a key informant to all development applications.</p>	<p><u>order to assess the existing freshwater conditions and the possible impacts which might occur.</u></p> <p>The WCBSP states that <i>"Areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of PAs or CBAs, and are often vital for delivering ecosystem services.</i></p> <p><i>ESAs need to be maintained in at least a functional and often natural state, in order to support the purpose for which they were identified, but some limited habitat loss may be acceptable."</i></p> <p>This is noted. A more comprehensive discussion would be undertaken should either of the Botanical Assessment or the Freshwater Assessment had found any biophysical constraints to development and could result in negative impacts. However both the botanical and freshwater assessments have indicated that the site does not have any biophysical constraints. Furthermore the Botanical Assessment concluded that restoration of the site is not viable <i>"Since the site does not support any natural vegetation or species, does not play an important role in terms of ecological corridors, and has a very low restoration potential,</i></p>
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			<p>3. In relation to freshwater impacts, the Berg River is located approximately 1.2 kilometres East of the proposed Industrial Complex development. A wetland is mapped around the dam to the north west of the property with a portion of the wetland being mapped as occurring along the north western boundary of the property and coinciding with the CBA. As noted in point 2 above, one of the reasons for the CBA being mapped in this area is water source protection. The BAR should provide more information in relation to water source protection and the mitigation of potential impacts on water resources. For example the BAR indicates that treated effluent will be discharged into the watercourse located toward the north of the sewage treatment plant. The potential impacts of this need to be more comprehensively assessed, particularly in the context of the mapped ESA2 across the northern and eastern sections of the site. As indicated in the botanical report, this aspect (correctly) did not form part of the scope of the botanical report and thus, in the absence of the freshwater report, has remained unassessed.</p>	<p><i>development would be supported across the entire site."</i></p> <p>The Freshwater Impact Assessment concluded the following: <i>"No freshwater resources were identified within the study area, but an unnamed tributary of the Berg River was identified within the northern portion of the investigation area, approximately 230m north of the study area.</i></p> <p><i>Overall, the tributary within the investigation area can be considered largely modified due to historical transformation of the surrounding area to agricultural practices. The tributary is dominated by a monoculture of robust reeds species which does provide habitat to avifaunal species."</i></p> <p>The potential impacts of the discharge of the treated effluent has also been included as part of the scope for the freshwater assessment. It was concluded that <i>"since the proposed treatment plant is located approximately 50m south of the unnamed tributary, the construction thereof is considered to be of low risk significance. Nevertheless, mitigation measures should be implemented to limit the potential occurrence of edge effects on the tributary. This includes covering all stockpiles to limit dust generation (and subsequent sedimentation of the unnamed tributary) during the construction</i></p>
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			<p>4. The WCBSP indicates that in addition to the CBA there are Ecological Support Areas (ESA2) mapped across the northern and eastern parts of the property. The reasons for the ESA status are given in the WCBSP as being to protect a water source area and for water course protection. Additionally the reason for the ESA in this area is due to the mapped natural</p>	<p><i>activities and preventing construction vehicles and personnel from entering the 32m Zone of Regulation (NEMA). As treated effluent will be discharged from the treatment plant into the tributary via an underground pipeline, excavation of a trench within the 32m Zone of Regulation (NEMA) up to the embankment of the unnamed tributary is required. The stormwater management infrastructure also entails the installation of underground pipelines within the 32m Zone of Regulation (NEMA) of the tributary as stormwater from the study area will be discharged into the tributary. The construction of the stormwater management infrastructure and that of the effluent pipeline will pose a Moderate risk significance to the tributary. In order to ensure that limited impacts from the open trenching activities occur on the tributary, it is considered imperative that the construction activities be undertaken during the dry summer period when the flow is very low in the tributary and that sedimentation of the system is limited by applying the recommended mitigation measures”.</i></p> <p>The Botanical Assessment concluded that restoration of the site is not viable “<i>Since the site does not support any natural vegetation or species, does not play an important role in terms of ecological corridors, and has a very low restoration potential,</i></p>
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			<p>vegetation type (Swartland Alluvium Fynbos) being Critically Endangered. The desired management objective for ESA2 areas is that they are restored and / or managed to minimise impact on ecological infrastructure functioning, especially soil and water related services – of particular relevance given that the reason for the ESA in this area is for water course and water source protection (ground water recharge). The potential for the restoration of the threatened vegetation type (Swartland Alluvium Fynbos) within the mapped ESA and CBA areas of the property should be explored in the next phase (2nd Draft BAR) of the development application process.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p><i>development would be supported across the entire site.”</i></p> <p>No remnant natural vegetation remains on site from years of agricultural activities. The restoration potential of the site is extremely low.</p>
<p>Samornay Smidt</p>	<p>03 December 2018</p>	<p>Email</p>	<p>1. The draft Basic Assessment Report (“BAR”) document dated 26 October 2018, as received by the Department on 29 October 2018 and the Departments correspondence dated 2 November 2018, refer.</p> <p>2. Please find herewith the Departments provisional comment on the Draft BAR:</p> <p>2.1 Activities 12 and 19 of Listing Notice 1 are included in the list of activities applied for but the development description does not include or describe the portion of the development that relate to these activities. Nor does the potential impacts considered in the report relate to the above listed</p>	<p>Activity 19 has been removed and will no longer be applied for. A development description has been provided for the inclusion of Activity 12. An assessment of the impacts have also been included under</p>

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			<p>activities. The applicability thereof is therefore unclear and must be clarified.</p> <p>2.2 Since water supply, electricity supply and solid waste removal services will be supplied by the Municipality, you are required to provide this office with confirmation that the relevant authority has sufficient capacity to provide the necessary services to the proposed development. Confirmation of the availability of services from all the service providers must be provided together with the BAR.</p> <p>2.3 Comment from, but not limited to the following authorities must be obtained during the Public Participation Process and include the final BAR submitted for decision making:</p> <ul style="list-style-type: none"> • Heritage Western Cape • Cape Nature • Drakenstein Municipality, including their Directorate: Planning and Economic Development, • Department of Water and Sanitation, • DEA&DP: Directorate: Pollution Management, • DEA&DP: Directorate: Waste Management, • Department of Transport and Public Works, and • Department of Agriculture 	<p>Section G of the 2nd Draft Post App BAR.</p> <p>For confirmation of services, please refer to Annexure F of the BAR for the Drakenstein Civil Services Comment.</p> <p>Please note that the preferred alternative for water supply, is via the existing boreholes on the property. The volume of the existing boreholes could be increased by installing piezometers. Additionally it is possible that an additional borehole will be sunk, this can only be determined after the installation of piezometers.</p> <p>This is noted. The report has been circulated to all the departments as listed. Please note that no comment has been forthcoming from the Department of Water and Sanitation, although a meeting was held in order to discuss the WULA requirements. Furthermore the WULA has been submitted and an approval is currently awaited. The report has also been circulated to the Department of Transport and Public Works on two occasions and no comment was issued. This will again be requested as part of the 2nd Draft Post-App BAR.</p>
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			<p>2.4 The comments received during the Public Participation Process for this application must be incorporated into a Comments and Response Report that adequately addresses any highlighted issues. Copies of the comments received as well as the Comments and Response Report must be included in the final BAR during the application phase.</p> <p>2.5 Proof of compliance with all the public participation steps undertaken, as required in terms of Regulation 41 of NEMA EIA Regulations, 2014 (as amended) must be included in the final BAR.</p> <p>2.6 Please be advised that an original signed and dated applicant declaration is required to be submitted with the final BAR to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.</p> <p>2.7 In addition to the above, please ensure that original signed and dated EAP and specialist declarations are also submitted with the final BAR for decision-making.</p> <p>2.8 Please note that omission of any required information in terms of Appendices 1 & 4 of the EIA Regulations, 2014 (as</p>	<p>This is noted and has been incorporated in a comments and response report attached as Annexure D.</p> <p>This is noted and has been provided as Annexure D.</p> <p>This will be submitted with the Final BAR to be submitted to the Department in due course.</p> <p>This will be submitted with the Final BAR to be submitted to the Department in due course.</p> <p>This is noted.</p>
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			<p>amended) with respect to the final submission to the Department of the BAR and EMPr respectively, may result in the application for environmental authorisation being refused.</p> <p>3. Kindly quote the above-mentioned reference number in any future correspondence in respect of this application/</p> <p>4. Please note that the activity may not commence prior to an Environmental Authorisation being granted by the Department.</p>	
Cindy Winter	23 January 2019	Email	<p>Dear Sir</p> <p>Your Draft Basic Assessment Report dated October 2018 has reference.</p> <p>The proposed application entails the rezoning, subdivision and establishment of an industrial complex on Farm 915, Simondium. Farm 915, Simondium is bordered to the east by Farm Drakenstein Wynkelders No. 1337 and Main Road 191 and bordered by agricultural farms to the north, west and south. It is noted that Farm 1337 is also owned by the applicant and zoned as industrial 1.</p> <p>The proposal consists of a mixture of office, light industry/warehousing and residential opportunities within one development. The residential component will cater for housing needs of staff and families who are currently located on site.</p>	<p>Agreed.</p> <p>Agreed.</p>

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			<p>It is noted that the Botanical Assessment, as conducted by Bergwind Botanical Surveys and Tours, indicated that the site does not support any remaining natural vegetation and that the entire site has development potential from a botanical perspective.</p> <p>The BAR does not identify any other significant environmental features on site, which is in concurrence with the Draft Drakenstein Environmental Management Framework (2015).</p> <p>The Environmental Management Division does not object to the proposed development on condition that the following preliminary concerns are addressed:</p> <ol style="list-style-type: none"> 1. As the development is situated adjacent to agricultural land, measures shall be put in place in all habitable buildings to ensure the indoor air quality is not affected by emissions from normal agricultural activities. 2. Due to the close proximity of the office spaces and residential units to the industrial facilities, a noise impact assessment must be conducted. Such assessment should determine the appropriate mitigation measures to be implemented in order to ensure that indoor noise levels will comply with table 2 of SANS 10103. The noise impact assessment must assume that the industrial activities on site will emit the maximum allowable noise levels for industrial districts, as prescribed in the Western Cape Noise Control Regulations of 2013. 	<p>Agreed.</p> <p>This is noted and agreed.</p> <p>The Noise Impact specialist communicated that it would be unrealistic to require the implementation of noise mitigation procedures that would encompass all possible types of activities producing 70 dBA within the industrial district if such activities with associated noise levels would not actually occur.</p> <p>In accordance with SANS 10103:2008 a NIA of any proposed development is to be based on objective information and data. This</p>
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			<p>The Environmental management Division would like to reserve the right to provide final comment on the land use application until such time as written proof of Environmental Authorisation as granted by the DEA&DP has been received.</p> <p>C WINTER MANAGER: ENVIRONMENTAL MANAGEMENT</p>	<p>requires detailed knowledge and noise level data of all machinery and associated activities which will form part of the proposed development. At the time of submitting the proposed rezoning, subdivision and development of a mixed use development of the property no information pertaining to what respective activities were envisaged in the industrial zone was available.</p> <p>The Environmental Management Division of the Drakenstein Municipality (Drakenstein 5 March 2019) stipulated that the outdoor noise rating level on all erven within the proposed development are to be limited to that for a suburban district with little road traffic as prescribed in Table 2 of SANS 10103:2008. The respective daytime and night-time rating levels for noise are 50 dBA and 40 dBA.</p> <p>With particular emphasis on the industrial portion of the proposed development, prior to the signing of any lease, a NIA is to be conducted on each of the proposed activities and any noise mitigation procedures that may be required are to be incorporated that will ensure that the respective daytime and night-time rating levels for noise of 50 dBA and 40 dBA will not be exceeded anywhere on the proposed development property.</p>
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				Similarly, all other activities that will take place on the proposed development property may not cause the daytime and night-time rating levels for noise of 50 dBA and 40 dBA, respectively, to be exceeded.
Mr Cor van der Walt	24 January 2019	Email	<p>Your application of 26 October 2018 has reference.</p> <p>The Western Cape Department of Agriculture has no comment.</p> <p>Please note:</p> <ul style="list-style-type: none"> • Kindly quote the above-mentioned reference number in any future correspondence in respect of the application. • The Department reserves the right to revise initial comments and request further information based on the information received. 	It is noted that the Western Cape Department of Agriculture has no comment.
Mr L Pienaar	26 February 2019	Email	<p>Your letter dated 7 February 2019 refers.</p> <p>1. WATER</p> <p>Drakenstein Municipality currently has no bulk infrastructure in the area to accommodate the proposed development;</p> <p>1.1 All potable water supplied to consumers on the farm shall comply with SANS 241 as amended. Proof of compliance test no older than 6 months must be available on request. All testing</p>	This is noted. Please note that the preferred alternative for water supply, is via the existing boreholes on the property. The volume of the existing boreholes could be increased by installing piezometers. Additionally it is possible that an additional borehole will be sunk, this can only be

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			<p>must be done by an accredited service provider;</p> <p>1.2 The developer will be required to connect to future Drakenstein Municipal networks when it is provided;</p> <p>1.3 Water saving devices shall be installed in toilets, bathrooms and basins;</p> <p>1.4 Any existing system that is to remain shall be upgraded to minimum municipal standards; and</p> <p>1.5 A Water demand management plan must be submitted to the Civil Engineering Department and must include and indicate the measures to be put in place to conserve and manage water.</p> <p>2. SEWAGE</p> <p>Drakenstein Municipality currently has no bulk infrastructure in the area to accommodate the proposed development;</p> <p>2.1 The developer will be responsible to connect to future municipal networks when it is provided;</p> <p>2.2 No new septic tanks allowed, all old/existing septic tank and soakaway systems must comply with the Water Research Commissions Report IT 114/99. No conservancy tank will be allowed within 100m of the 1:50 year flood line;</p> <p>2.3 The municipality cannot guarantee a tanker service at all times and the owner remains responsible for the servicing of the</p>	<p>determined after the installation of piezometers.</p> <p>This is noted and has been indicated to the engineers.</p> <p>This is noted and agreed.</p> <p>This is noted and agreed.</p> <p>This is noted and agreed.</p> <p>This is noted.</p> <p>This is noted and agreed.</p> <p>No septic tanks are proposed as part of the development and any existing tanks will be removed.</p> <p>This is noted and agreed. The onsite sewage treatment system will be serviced in line with a service</p>
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			<p>conservancy tank. Any private company used must be registered with the Municipality and must provide the owner of an invoice for services rendered. All invoices must be submitted on a monthly basis to the Waste Water Services section as proof of compliance;</p> <p>2.4 No raw effluent may be sent to the WWTW in bulk. A maximum of 500L daily can be accepted but the quality of the effluent is to be as stated in the municipal by-law;</p> <p>2.5 The Operation and Management system must be discussed with and approved by Drakenstein Municipality Civil Engineering Services Department;</p> <p>2.6 Any on-site treatment works will require the necessary authorisations, prior to the approval of any construction/building plan and be completed prior to any occupancy certificate being issued; and</p> <p>2.7 Any existing system that is to remain shall be upgraded to minimum municipal standards;</p> <p>3. STORMWATER</p> <p>Drakenstein Municipality currently has no bulk infrastructure in the area to accommodate the proposed development;</p> <p>3.1 Any new stormwater networks will be the responsibility of the developer, including all internal and bulk connectors;</p>	<p>agreement between the manufacturers and the applicant.</p> <p>This is noted and has been indicated to the engineers.</p> <p>This is noted and has been indicated to the engineers.</p> <p>This is noted and agreed. The required authorisation has been applied for in terms of the National Water Act.</p> <p>This is noted and has been indicated to the engineers.</p> <p>This is noted.</p> <p>This is noted and has been indicated to the engineers.</p>
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			<p>accommodate the detention of run-off for a 1:50 year storm event;</p> <p>3.5 Contaminated run-off (washing water, storm water, etc) must be disposed of in such a manner so as not to cause any pollution to surface, ground water or create a nuisance</p> <p>3.6 Any organic waste (manure, compost, etc.) must be stored in such a way so that between removals there shall be no chance of polluted storm water run-off taking place, especially during the rainy season; and</p> <p>3.7 Provision must be made for an effective rain water harvesting system to be planned and designed for all roof water. The volume of the storage facilities should be based on 0.02m³/m² roof area.</p> <p>4. ROADS</p> <p>Access to the premises will be obtained via the R45 which is a provincial road. The applicant will therefore be responsible to ensure that;</p> <p>4.1 Approval from the Provincial Roads Engineer is obtained;</p> <p>4.2 Any alterations to the existing road network will be the responsibility of the developer, including design, approval and construction of any additional traffic control and or traffic calming measures as detailed in the Traffic Impact Assessment (TIA) of ICE dated 3 October 2018.</p>	<p>This is noted and has been indicated to the engineers.</p> <p>This is noted and agreed.</p> <p>This is noted and agreed. It is proposed to harvest rain water in the reservoir and possible use that along with treated effluent for irrigation. This will form part of the service level agreement to be submitted.</p> <p>This is noted.</p> <p>This is noted.</p> <p>This is noted.</p>
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			<p>5. WASTE</p> <p>We can confirm that Farm 915 Paarl, can be accommodated at the Drakenstein Municipality landfill;</p> <p>5.1 All solid waste disposal shall comply with, the National Environmental Management Waste Act 59 of 2008. Proof of compliance must be available on request; and</p> <p>5.2 A waste recovery/recycling initiative has been implemented in Drakenstein and the development will have to be prepared to comply with any requirements as the project is rolled out.</p> <p>6. GENERAL</p> <p>6.1 The developer is also responsible for the funding of all connections to the bulk services and all internal works;</p> <p>6.2 All of the works, including but not limited to; roads, stormwater, water, sewers, landscaping, irrigation, etc. shall be designed by a suitably registered (ECSA registration of the civil works and SACLAP registration for the landscaping) person and any such works shall be constructed under supervision of such registered person. All such design plans shall be submitted to the Civil Engineering Services Department of</p>	<p>This is noted and agreed.</p> <p>This is noted and agreed.</p> <p>This is noted and agreed.</p> <p>This is noted and has been indicated to the engineers.</p> <p>This is noted and has been indicated to the engineers.</p>
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			<p>Drakenstein Municipality for approval prior to the commencement of construction;</p> <p>6.3 All works where applicable shall be constructed to at least the minimum standards as set out in Engineering Services: Municipal Standards;</p> <p>6.4 Where applicable all water network, sewer network, stormwater network and road network components (downstream of the valve immediately upstream of the bulk water meter, upstream of the connection to the existing system or intersection point with the existing road) shall be a private combined system and shall be indicated as such on all documents and plans;</p> <p>6.5 All private combined systems (including but not limited to water, sewer, stormwater, roads, irrigation, etc) shall be the joint and severalty responsibility (including but not limited to the administration of the joint account and maintenance of the system) of the members of the home owners association/body corporate and must be noted as such in any constitution of any such body and any such constitution must be submitted for approval by council. This constitution shall be notorially linked to each separate title deed;</p> <p>6.6 A comprehensive operational infrastructure management plan shall be drawn up and submitted for approval by die Civil Services Department;</p> <p>6.8 A set of accurate as built drawings as per Drakenstein Municipality; Civil</p>	<p>This is noted and has been indicated to the engineers.</p> <p>This is noted and has been indicated to the engineers. All internal services will be private in nature and maintained by the body corporate or property owners association.</p> <p>This is noted and has been indicated to the engineers. All internal services will be private in nature and maintained by the body corporate or property owners association. This will form part of the service level agreement to be submitted.</p> <p>This will form part of the service level agreement to be submitted.</p> <p>Noted and agreed.</p>
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			<p>Engineering Department's Standards must be submitted at the practical completion inspection; and</p> <p>6.7 The above conditions are to be complied with in stages.</p> <p>6.7.1 Requirements associated with preparation of plans, drawings, permits, agreements and approvals. These shall be complied with prior to construction;</p> <p>6.7.2 Requirements associated with the completion of construction, development contributions, as built drawings, maintenance management plans, agreements, etc. These will be complied with prior to the transfer of any property/building in the phase; and</p> <p>6.7.3 Requirements associated with the long term operations.</p> <p>Proof of compliance must be available on request.</p> <p>Any further enquiries can be made to Mr L Pienaar of this department.</p>	<p>Noted and agreed.</p> <p>Noted and agreed.</p> <p>Noted and agreed.</p> <p>Noted and agreed.</p>
Palmira De Almeida	Email	25 April 2019	<p>Thank you for notifying SAHRA about the proposed mixed-use development of Farm Cumberland No. 915, Simondium, located within the Cape Winelands Cultural Landscape.</p> <p>The following documents were submitted and reviewed:</p> <p>1. Preferred Site Development Plan</p>	

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			<p>The Landscape character is sensitive hence should be extensively considered and used as a guiding element. However, the site is positioned within low visibility, therefore the proposed development's visual impact is considered to be minor.</p> <p>In principle, SAHRA does not object to the development proposal of Farm Cumberland No. 915, considering that all heritage related principles of the National Heritage Resources Act No. 25 of 1999 are adhere to.</p> <p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p> <p>Yours faithfully Enquiries: Palmira de Almeida Date: Thursday April 25, 2019 Email: pdealmeida@sahra.org.za Page No: 1 CaseID: 13167</p>	<p>It is noted that SAHRA does not object to the proposed development of Farm Cumberland No. 915. The Final HIA was submitted to the Heritage Western Cape on the 2nd of July 2019.</p>
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POST APPLICATION DRAFT BASIC ASSESSMENT REPORT COMMENTS AND RESPONSE REPORT
19 JUNE 2019 – 19 JULY 2019

<p>Renier Kapp</p>	<p>20 June 2019</p>	<p>Email</p>	<p>Dear Interested and Affected Parties,</p> <p>Please find herewith attached a letter notifying you of the availability of the Post Application Draft Basic Assessment Report.</p> <p>Feel free to contact me at the details below should you require any further information.</p>	
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			Yours Sincerely,	
Mark Job	20 June 2019	Email	<p>Hi Renier</p> <p>The SDP was not attached to your earlier email.</p> <p>Please send me a copy.</p> <p>Regards</p>	<p>Hi Mark,</p> <p>The SDP has not changed since the initial review period, I herewith attached a copy for perusal. The entire Basic Assessment Report and annexures is also available on our website.</p> <p>Let me know if you require anything further.</p> <p>Sincerely,</p>
Philippa Huntley	19 July 2019	Email	<p>CapeNature would like to thank you for the opportunity to comment on the above application and wish to make the following comments. Please note that our comments pertain only to biodiversity related impacts and not to the overall desirability of the application.</p> <p>1. CapeNature's comments of 25 November 2018 submitted in response to the Pre-application DBAR have been correctly reflected in the report. The comprehensive comments and responses table addresses issues raised including the need for a Freshwater Specialist Assessment.</p> <p>2. The Freshwater Specialist Assessment subsequently undertaken by Scientific Aquatic Services CC, has provided a thorough assessment of the existing conditions and possible impacts that may occur as a result of the proposed</p>	

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			<p>development. The crux of the issue, as concluded by the freshwater specialist, is that since the proposed development within the study area is located outside of the 100m Zone of Regulation in accordance with the National Water Act, 1998 (Act 36 of 1998) (NWA) of the unnamed tributary, the proposed development activities within the study area do not pose any legislative or freshwater conservation constraints and a Water Use Authorisation for the activities within the study area is not required.</p> <p>However the freshwater specialist does go on to note that since the treatment plant is located within 100m of the tributary, and treated effluent and stormwater from the proposed development will be used for irrigation with any overflow discharged directly into the system, authorisation from DEA&DP for the above-listed activities and a Water Use Authorisation from DWS will be required. The recommended mitigation measures as provided in the Freshwater Report are strongly supported, particularly the recommendation that all stormwater management be undertaken utilising Sustainable Urban Drainage systems (SuDS) and not via trenched pipes. This would entail the creation of earth swales (vegetated with indigenous freshwater vegetation) to discharge the stormwater and treated effluent into the unnamed tributary, rather than it being piped. The freshwater specialist stresses that if this preferred control measure is implemented, the construction of these stormwater swales is considered of low risk significance.</p>	<p>This is noted and agreed. Please note that a water use license have been submitted in line with this requirement and the proof of submission is herewith attached as Annexure I. The water uses included in the WULA application includes section 21 (c) & (i) 21 (e) (f) and (g).</p> <p>The engineers have updated the Stormwater Management design in order to accommodate these findings as far as possible. As per the updated Engineering Services Report: <i>The stormwater network will, where possible follow the Sustainable Urban Stormwater Design (SUDS) guidelines. The network will consist of open channels with swales and polishing ponds as well as catch pits and concrete pipes inside the development area. The stormwater network will be designed to limit the post development peak flow to the pre-development runoff levels. The swales, polishing and retention ponds will enhance the quality of the</i></p>
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			<p>3. Potential botanical impacts have been addressed via a botanical specialist assessment and site survey which concludes that the site does not support any remaining natural vegetation, does not play an important role in terms of ecological corridors, and has a very low restoration potential. This is accepted and the proposed development is thus not opposed in terms of potential negative botanical impacts.</p> <p>4. In conclusion, the proposed development and associated proposed rezoning and subdivision are not opposed, provided the recommendations as provided in the freshwater report are adhered to.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p><i>stormwater runoff. The channel widths will vary from 1.5m to 3.0m The stormwater, as well as the treated effluent will discharge into the existing 600mm storm water pipe crossing the railway line and the R45 via a reed bed which will also act as an irrigation pond. The crossing is situated on Erf 1337. The stormwater from the development on Erf 915 will link into the stormwater network on Erf 1337. A proposed stormwater design have also been included and will be the Preferred Storm water treatment alternative.</i></p> <p>This is noted and agreed.</p> <p>The recommendations have been included in the Basic Assessment Report, EMP and the updated engineering services report.</p>
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<p>Samornay Smidt</p>	<p>19 July 2019</p>	<p>Email</p>	<p>The above-mentioned document dated 19 June 2019, as received by the Department on the same day and this Departments correspondence dated 27 June 2019, refer.</p> <p>2. Please find herewith the Departments comment on the draft BAR:</p> <p>2.1 This Departments comment dated 3 December 2018 was included in the Draft Report but not addressed in the comments and response report. Please be advised that copies of all comments received must be included in the Final BAR and addressed in the comments and response report.</p> <p>2.2 The following points highlighted in the aforementioned comment must still be addressed:</p> <p>2.2.1 A description of the portion of the development that relates to Activities 12 and 19 still does not include adequate detail with regards to dimensions and footprints related to structures and infrastructure proposed for construction. The information contained in the proposed alternative/s must include a detailed description of the development that relates to the applicable listed activities. In this instance, a description of the stormwater and effluent discharge infrastructure.</p>	<p>This has been updated and the comment from your Department dated 3 December 2018 has been included and addressed in the comments and response report.</p> <p>Activity 19 has been removed from the application and will no longer be applied for.</p> <p>A development description has been provided for the inclusion of Activity 12. The foot print of the upgraded portable treatment plant will be approximately 50m² and will have a treatment capacity of 66kl/day. The irrigation pond will be approximately 150m² in extent and be located at the northern most corner of Erf 1337 and within 32m of the watercourse. This has been assessed by the Freshwater Impact Assessment and an assessment of the impacts have also been included under Section G of the 2nd Draft Post App BAR.</p>
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			<p><u>2.2.2 Service Confirmation:</u></p> <p><u>Water Supply:</u> The preferred alternative for water supply requires further feasibility studies and landowner negotiations. The available capacity for water supply is therefore not confirmed.</p> <p><u>Electricity Supply:</u> Indicated that sufficient capacity is available, subject to the construction and commissioning of the substations. Please provide this Department with the Municipal timeframes</p>	<p>The existing stormwater outlet structures from the storm water network in the road reserves is located further that 32m from the watercourse.</p> <p>This is noted. Please note that the preferred alternative for water supply, has been amended and now includes the provision via the existing boreholes on the property. The volume of the existing boreholes could be increased by installing piezometers. Additionally it is possible that an additional borehole will be sunk, this can only be determined after the installation of piezometers.</p> <p>There are three boreholes on the two properties – Farm 915 and Erf 1337. The total tested yield is 47kl/day. The water quality conforms to drinking water standards. The water will be filtered and comply with SANS 241 at all times.</p> <p>The yield of the existing boreholes can possibly be increased by installing piezometers to monitor the ground water levels in the boreholes to increase the abstraction.</p> <p>As per the feedback from the Electrical Engineer: <i>Construction of the substation will commence as soon as construction commences on Portion 1337 2nd phase, or if</i></p>
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			<p>envisioned with regards to the construction and commissioning of substations to confirm that this coincides with the construction and operation of the development.</p> <p>2.2.3 A final comment from Heritage Western Cape is required for the proposed development, and not an interim comment. In order to avoid duplication and allow for coordination in terms of the requirements in terms of NEMA and the NHRA, Section 38(8) of the NHRA states “that if the development activities listed in Section 38 (1) must be subjected to EIA in terms of NEMA, then a separate HIA and approval from the heritage resources authority are not required, provided that the environmental authority must:</p> <ul style="list-style-type: none"> • Ensure that if the relevant heritage resources authority requires and HIA it fulfils the requirements of the heritage resources authority, & • Any comments and recommendations of the relevant heritage resources authority with regard to such development have been taken into account prior to the granting of the environmental authority’s consent. 	<p><i>construction are to commence on this development. Land area will be provided by the developer in Portion 1337. Building for substation constructed by developer. Existing feeder lines in the area will be routed by the municipality into the substation, to cater for all developments in the area. Timeframe of substation construction is dependent on construction to commence in Portion 1337 and/or Portion 915.</i></p> <p>The Final HIA has been submitted to the Heritage Western Cape on the 2nd of July 2019. Proof of submission is herewith attached as Annexure F. The application will serve before the Committee on the 7th of August 2019 and the Final Comment will be submitted to your Department with the Final BAR.</p>
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			<p>As such, if a NEMA EIA is required for the development activities listed in terms of Section 38 of the NHRA, then separate HIA and EIA processed may not be followed and separate decisions may not be issued in terms of the NHRA and NEMA. An EIA process will be followed and if the heritage resources authority requires a HIA, the HIA must be undertaken as one of the EIA specialist studies, but the environmental authority must ensure that the heritage resources authority's requirements in terms of the assessment are met." Hence, the requirements of HWC must be met as part of this Basic Assessment process and not after it is concluded.</p> <p>2.2.4 Confirmation from the Department of Water and Sanitation ("DWS") whether a General Authorisation or a Water Use License Application ("WULA") is required, must be obtained. If a WULA is required, proof of submission of the WULA to the DWS must be provided.</p> <p>2.2.5 Comment form the Department of Transport and Public Works with regards to the findings of the Traffic Impact Assessment must be provided.</p>	<p>A Pre-Application meeting was held with the Department of Water and Sanitation. It was agreed that a Water Use License Application ("WULA") is required due to the fact that treated water from the sewage treatment plant will be utilized for irrigation purposes. A full WULA application has been submitted to the DWS and the proof of submission is herewith attached as Annexure F.</p> <p>An electronic copy of the report including the Traffic Impact Assessment has twice been circulated to the Department of Transport and Public Works: Road Network Manager – Mrs Grace Swanepoel. An electronic copy of the report has also been circulated twice to the PGWC: Roads Network Management Branch – Mr Alvin Cope. Proofs are herewith attached</p>
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			<p>2.2.6 Comment from this Department's Directorates: Pollution Management and Waste Management must be obtained and included in the final BAR.</p> <p>2.3 Further to the above, Drakenstein Municipality: Environmental Management Division must confirm whether their comment with regards to the potential noise impact was adequately addressed.</p> <p>2.4 In light of the fact that Activity 19 of LN 1 is triggered, it is recommended that a Maintenance Management Plan (MMP) forms a component of the EMP. Should this Department agree to the MMP, future maintenance work specified within the MMP would not require an Environmental Authorisation prior to the undertaking of such future maintenance activities. The Department encourages the inclusion of a MMP for applications that involve work within watercourses. Therefore, a MMP for future maintenance work within a watercourse must be compiled and submitted with the final BAR to this Department.</p> <p>2.5 The Impact tables does not include freshwater, noise and traffic impacts, and must be amended to include all identified impacts.</p>	<p>as Annexure E. No comment has been obtained from either these Departments. This 2nd Draft Post-App BAR will again be circulated to these Departments for comment.</p> <p>This has been obtained and is included in the report as Annexure F</p> <p>This comment was sought from the Department and the correspondence trail and subsequent confirmation has been included as part of Annexure F.</p> <p>Please note that Activity 19 has been omitted from the application as the engineers have confirmed that this activity will not be triggered.</p> <p>This has been updated and these impacts have been added to the impact tables in line with this request.</p>
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			<p>2.6 It is unclear whether the recommendation of the Freshwater Impact Assessment have been incorporated into the development proposal. This is with specific reference to the recommended storm water management measures and proposed detention pond since it is not included in the project description or reflected in the layout plan.</p> <p>2.7 Further to the above and as required in terms of Appendix 1 3(1) (c), a plan which locates the proposed activity or activities applied for as well as the associated structures and infrastructure at an appropriate scale, must be included in the BAR. This layout plan must be amended to include all the components of the</p>	<p>The engineers have updated the Stormwater Management design in order to accommodate these findings as far as possible. As per the updated Engineering Services Report: <i>The stormwater network will, where possible follow the Sustainable Urban Stormwater Design (SUDS) guidelines. The network will consist of open channels with swales and polishing ponds as well as catch pits and concrete pipes inside the development area. The stormwater network will be designed to limit the post development peak flow to the pre-development runoff levels. The swales, polishing and retention ponds will enhance the quality of the stormwater runoff. The channel widths will vary from 1.5m to 3.0m The stormwater, as well as the treated effluent will discharge into the existing 600mm storm water pipe crossing the railway line and the R45 via a reed bed which will also act as an irrigation pond. The crossing is situated on Erf 1337. The stormwater from the development on Erf 915 will link into the stormwater network on Erf 1337.</i></p> <p>All activities applied for are included as part of the Preferred Site Development Plan. Additionally a proposed stormwater management design, which includes the location of the sewage treatment plant and the irrigation pond / reed bed have also been included as part of Annexure H and will be the Preferred Storm water</p>
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			<p>development as it relates to the listed activities being applied for.</p> <p>2.8 Since associated infrastructure required for the development that triggers listed activities extend onto Erf No. 1337, the relevant property details must be included in the relevant sections of the Application Form and BAR.</p> <p>2.9 Be advised that an original signed and dated applicant declaration is required to be submitted with the final BAR to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.</p> <p>2.10 In addition to the above, please ensure that original signed and dated Environmental Assessment Practitioner declaration is also submitted with the final BAR for decision making.</p> <p>3. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.</p> <p>4. Please note that it is an offence in terms of Section 49A(1)(a) of the NEMA for a</p>	<p>treatment alternative. This plan along with the Preferred SDP clearly shows all activities being applied for.</p> <p>The details of Erf 1337 have been included in the report in line with this comment.</p> <p>This is noted and will be submitted with the Final BAR application to be submitted to the Department.</p> <p>This is noted and will be submitted with the Final BAR application to be submitted to the Department.</p>
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			<p>person to commence with a listed activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity. Failure to comply with the requirements of Section 24F of the NEMA will result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.</p> <p>5. This Department reserves the right to revise or withdraw any comments or request further information from you based on any information received.</p>	
Mrs Cindy Winter	19 July 2019	Email	<p>Reference is made to the Post-Application Draft Basic Assessment Report (DBAR) for the proposed rezoning, subdivision and development of a mixed use development on the abovementioned property.</p> <p>The Environmental Management Division (EMD) circulated the Post-Application DBAR to the following departments / divisions for comment: Engineering Services Department; Infrastructure Management; Electro-technical Services; Planning and Development: Spatial Planning; Planning and Development: Land Use Planning; Planning and Development: Heritage.</p> <p>Comments were received from the following departments/divisions:</p>	

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			<p>Engineering Services Department: Infrastructure Management – Lawrence Smith (Annexure A) This department has no further comment on this application.</p> <p>Planning and Development: Spatial Planning – Bisschoff Bosman (Annexure B) In the 2018 Spatial Development Framework (SDF) the site is designated as “Industrial Core” and “Urban Infill” which makes provision for office, industrial and residential land uses. The proposal is deemed to be in line with the general provisions of the 2018 SDF, (i.e. is consistent).</p> <p>Furthermore, the BAR addresses concerns related to vehicle access, visuals from the R45 (Scenic Route) and, in general, the provision of civil services. Please see Annexure B for the full comment from the Spatial Planning.</p> <p>Planning and Development: Land Use Planning and Surveying Section – Jaime Meyer (Annexure C) Based on the information provided in the Post-Application DBAR, the details of the report correspond with that of the land use application that has been submitted and subsequently processed. The Land Use Planning and Surveying Section therefore has no comments on the above application, as all land use planning requirements will be addressed as part of the land use planning process. Please see Annexure C for the full comment from this section.</p>	<p>It is noted that the Engineering Services Department has no further comment on the application.</p> <p>It is noted that the proposal is deemed to be in line with the general provisions of the SDF.</p> <p>It is noted that the Land Use Planning and Surveying Section has no comments on the above application, as all land use planning requirements will be addressed as part of the land use planning process.</p>
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			<p>Planning Development: Heritage Zwelibanzi Shiceka (Annexure D) The Heritage Sub-section supports the heritage indicators on page 26 and the recommendations on page 32 of the Pre-Application DHIA by Cindy Postlethwayt, dated June 2018.</p> <p>EMD: Planning and Sustainability Section (Lauren King)</p> <p>Having reviewed the above Post-Application DBAR and associated Comments and Response Report, the Environmental Management Division is not satisfied with the response provided with regards to the Noise Impact Assessment previously requested by this Branch.</p> <p>1. Section 4(1) of the Western Cape Noise Control Regulations of 2013 state the following:</p> <p><i>4. (1) The land authority, or any other authority responsible for considering an application for a building plan approval, business license approval, planning approval or environmental authorisation, may instruct the application to conduct and submit, as part of the application –</i></p> <p><i>(a) a noise impact assessment in accordance with SANS 10328 to establish whether the noise impact rating of the proposed land use or activity exceeds the appropriate rating level for a particular district as indicated in SANS 10103; or</i></p>	<p>It is noted that the Heritage Sub-section supports the heritage indicators as part of the DHIA by Cindy Postlethwayt, dated June 2018.</p> <p>This is noted please refer to the subsequent updated correspondence from Drakenstein Municipality provided below.</p> <p>“Reference is made to your email correspondence, dated 22 July 2019, relating to the comments from Drakenstein Municipality on the above application, dated 19 July 2019.</p> <p>Abstract from email (full email attached as Annexure A):</p> <p><i>The recommendation from your Department – “a condition be included in the environmental authorisation that all activities within the development be limited to the rating level for urban districts as set out in table 2 of SANS 10103” is not the correct way to go about this to our opinion. This would imply a blanket ban on possible noise generating industry and a future amendment application to the DEA&DP would be</i></p>
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			<p><i>(b) where the noise level measurements cannot be determined, an assessment, to the satisfaction of the local authority, of the noise level of the proposed land use or activity.</i></p> <p>Due to the fact that no Noise Impact Assessment was undertaken in accordance with SANS 10328 as requested, the division does not support the development of the industrial and commercial areas with the full rights to produce noise up to the maximum respective rating levels for noise in districts as set out in table 2 of SANS 10103. This division recommends that should the application be approved, a condition be included in the environmental authorisation that all activities within the development be limited to the rating level for urban districts as set out in table 2 of SANS 10103.</p>	<p><i>required in order to remove this condition attached to the Environmental Authorisation. As per our previous correspondence and the request from the Engineer, it would make much more sense, seeing as Noise Impacts are overseen by Drakenstein Municipality, that a Noise Impact Assessment be submitted to and approved by Drakenstein Municipality prior to any building plan approvals by Drakenstein Municipality. This could then be included as a condition of approval in the Environmental Authorisation and any future planning approvals. This Noise Impact Assessment can from then on be updated as per the comment from Reece, as and when more detailed information becomes available.</i></p> <p><i>As per a comment obtained from DEA&DP on the Post-Application Draft BAR, DEA&DP has requested GNEC to obtain confirmation from your Department that the application can continue on this basis:</i></p> <p><i>“2.3 Further to the above, Drakenstein Municipality: Environmental Management Division must confirm whether their comment with regards to the potential noise impact was adequately addressed.”</i></p> <p>Having reviewed your request and discussing the matter with the relevant officials, the following</p>
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				<p>revised comment is brought to your attention:</p> <ul style="list-style-type: none">• Due to the close proximity of the proposed industrial and commercial erven to the proposed residential units, it is highly unlikely that noise will be dampened sufficiently to within the allowable rating levels for urban districts at the property projection plane of the nearest residential erf, should the industrial and commercial erven produce noise at the maximum allowable rating level in accordance with table 2 of SANS 10103.• Should a conflict arise in future, the rights of the residential home owners and tenants to enjoy noise levels within the prescribed rating level for urban districts shall take priority over the rights of owners and tenants of the industrial and commercial units to produce noise up to the maximum allowable noise levels for industrial and business districts as set out in table 2 of SANS 10103.• Should the Noise Control Officer determine that the noise level at the property projection plane of the nearest residential is causing a disturbing noise, any of the owners and tenants of the industrial and commercial units
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			<p>2. Furthermore, the recommendation of the Freshwater Specialist with regards to the use of Sustainable Urban Drainage Systems (SUDS) must be considered and incorporated in the Stormwater Management Plan of the proposed development.</p>	<p>may be required to conduct a Noise Impact Assessment in accordance with SANS 10328 at the request of the Noise Control Officer.</p> <ul style="list-style-type: none"> Any mitigation measures identified in the Noise Impact Assessment are to be implemented to ensure that all noise emanating from activities in the industrial and commercial districts will at all times not exceed the permissible outdoor levels on neighbouring residential premises and permissible indoor levels in office spaces. This includes vehicular traffic to and from the industrial and commercial districts. <p>Kind Regards</p> <p>The engineers have updated the Stormwater Management design in order to accommodate these findings as far as possible. As per the updated Engineering Services Report: <i>The stormwater network will, where possible follow the Sustainable Urban Stormwater Design (SUDS) guidelines. The network will consist of open channels with swales and polishing ponds as well as catch pits and concrete pipes inside the development area. The stormwater network will be designed to limit the post development peak flow to the pre-development runoff levels. The swales, polishing and retention ponds</i></p>
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			<p>3. The control measures specified by the Freshwater Specialist on pages 29-37 of the Freshwater Resource Ecological Assessment must be included under the relevant sections in the Environmental Management Programme (EMP) for both the Construction and Operational Phase sections of the EMP.</p> <p>4. As the proposed development will consist of 3 portions, i.e. Portion 1 (office buildings), Portion 2 (light industry/warehousing), and Remainder Portion (residential), the Operational Phase of the EMP must clearly state the parties responsible for the maintenance of stormwater and landscaping features throughout the development, the maintenance activities required, as well as the frequencies and time periods that these activities must occur.</p>	<p><i>will enhance the quality of the stormwater runoff. The channel widths will vary from 1.5m to 3.0m The stormwater, as well as the treated effluent will discharge into the existing 600mm storm water pipe crossing the railway line and the R45 via a reed bed which will also act as an irrigation pond. The crossing is situated on Erf 1337. The stormwater from the development on Erf 915 will link into the stormwater network on Erf 1337.</i></p> <p>This has been included as part of the relevant sections throughout the Environmental Management Programme for both the Construction and Operational Phase of the EMP.</p> <p>All internal services will be private in nature and maintained by the body corporate or property owners association. This will form part of the service level agreement to be submitted. Maintenance of underground networks will require cleaning before the rainy season and periodical inspections every 6 months. Open channels and polishing ponds will require more regular litter removal. Silt build-up of the open channels polishing ponds will have to be monitored on a monthly basis, especially during the construction phase.</p>
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			<p>5. Notwithstanding the above, a Landscape Master Plan for the entire development and/or subsequent Detailed Landscape Plans for the 3 portions, i.e. Portion 1 (office buildings), Portion 2 (light industry / warehousing), and Remainder Portion (residential) will be required as part of the land use planning process.</p> <p>Conclusion Having reviewed the application and circulated it to the relevant departments / divisions for comment, the Environmental Management Division (EMD) finds the above application in order, subject to the above concerns being addressed and included in the Final Basic Assessment Report, before submission to the competent authority.</p> <p>Should you wish to discuss the above comments, please do not hesitate to contact Lauren King (see above for contact details).</p>	<p>This is noted and agreed.</p> <p>It is noted that the Environmental Management Division (EMD) finds the above application in order, subject to the above concerns being addressed and included in the Final Basic Assessment Report, before submission to the competent authority.</p>
<p>Shehaam Brinkhuis</p>	<p>19 July 2019</p>	<p>Email</p>	<p>The Directorate: Pollution and Chemicals Management (D:PCM) hereby acknowledges receipt of the DBAR for the proposed development and has the following comments:</p> <p>1. The development proposal refers to “Light Industry/Warehousing” on Portion 2 but there is no indication of the extent of the industrial activities. It is acknowledged that light industrial uses (generally) have a lower potential pollution impact. However, it is recommended to broadly predict the types and extent of the industrial uses in order to</p>	<p>It was confirmed by the applicant that the extent of industrial activities to be conducted on site cannot be pre-determined as no pre-sales have occurred. The industries which is targeted, however, will light industrial uses such as storage, distribution and light manufacturing. No heavy</p>

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			<p>estimate the potential pollution and contamination risk.</p> <p>2. A freshwater impact assessment has been compiled by a qualified freshwater specialist, however, the potential impact of the proposed development on freshwater resources has, in our view, not been adequately addressed (or assessed) within the DBAR.</p> <p>3. Furthermore, management and mitigation measures to minimise the impact of both the construction and operational phases on the freshwater resources have not been carried through to the Environmental Management Programme (“EMPr”). Sections of the freshwater report have merely been copied to the DBAR and EMPr. It is requested that the considerations from the freshwater specialist’s assessment are incorporated into the appropriate portions of the DBAR and EMPs. As a minimum, these considerations should be included in the impact summary and tables of Section G2 of the DBAR and the aspect management tables of Section 4 of the EMPr.</p> <p>4. Limited information has been provided within the DBAR related to the proposed erosion control measures to be installed within the unnamed tributary of the Berg River to the north of the site to allow for the discharge of treated effluent and storm water. According to the freshwater report, this will be via underground pipelines and excavations up to the embankment of the tributary.</p>	<p>industry or hazardous activities will be included.</p> <p>This is noted. An assessment of the impacts have also been included under Section G of the 2nd Draft Post App BAR.</p> <p>All the control measures specified by the Freshwater Specialist on pages 29-37 of the Freshwater Assessment has been included under the relevant sections in the Environmental Management Programme (EMP) for both the Construction and Operational Phase sections of the EMP. This has been updated in line with this comment.</p> <p>The engineers have updated the Stormwater Management design in order to accommodate the Freshwater Assessment findings as far as possible. As per the updated Engineering Services Report: <i>The stormwater network will, where possible follow the Sustainable Urban Stormwater Design (SUDS) guidelines. The network will consist of open channels with swales and</i></p>
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PROPOSED SIMONDIUM MIXED USE DEVELOPMENT ON FARM 915 CUMBERLAND IN SIMONDIUM, WESTERN CAPE.

			<p>5. Additional detail is required on mitigation measures to prevent erosion and sedimentation within this watercourse. Furthermore, it is recommended that consideration be given to the post-implementation maintenance work of</p>	<p><i>polishing ponds as well as catch pits and concrete pipes inside the development area. The stormwater network will be designed to limit the post development peak flow to the pre-development runoff levels. The swales, polishing and retention ponds will enhance the quality of the stormwater runoff. The channel widths will vary from 1.5m to 3.0m. The stormwater, as well as the treated effluent will discharge into the existing 600mm storm water pipe crossing the railway line and the R45 via a reed bed which will also act as an irrigation pond. The crossing is situated on Erf 1337. The stormwater from the development on Erf 915 will link into the stormwater network on Erf 1337.</i></p> <p>Additionally a proposed stormwater management design, which includes the location of the sewage treatment plant and the irrigation pond / reed bed have also been included as part of Annexure H and will be the Preferred Storm water treatment alternative. Existing stormwater discharge infrastructure is in place and the storm water from this development will tie in to the stormwater from Erf 1337.</p> <p>As per the feedback from the Civil Engineers: The tributary is downstream of the property to be developed. Maintenance of this watercourse cannot be done by the owners of Erf 915. All mitigation</p>
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PROPOSED SIMONDIUM MIXED USE DEVELOPMENT ON FARM 915 CUMBERLAND IN SIMONDIUM, WESTERN CAPE.

			<p>infrastructure linked to discharge of effluent and storm water, as well as remedial action within the tributary in the case of negative impacts, such as failure of the sewage treatment plan, spills or significant erosion.</p> <p>6. Pollution control measures must be installed at inlet and outlet structures of the storm water network to mitigate against pollution emanating from the development.</p> <p>7. Page 17 of the DBAR states that <i>“once municipal sewer capacity is upgraded in future the development will connect to the Drakenstein municipal network.”</i> Once this connection to municipal services has been made, please indicate if the on-site waste water treatment plant is to be decommissioned?</p>	<p>measures will be done onsite as per the freshwater specialist’s recommendations.</p> <p>Additionally a proposed stormwater management design, which includes the location of the sewage treatment plant and the irrigation pond / reed bed have also been included as part of Annexure H and will be the Preferred Storm water treatment alternative. Existing stormwater discharge infrastructure is in place and the storm water from this development will tie in to the stormwater from Erf 1337.</p> <p>The introduction of swales, polishing and retention ponds will enhance the quality of the stormwater runoff. The channel widths will vary from 1.5m to 3.0m The stormwater, as well as the treated effluent will discharge into the existing 600mm storm water pipe crossing the railway line and the R45 via a reed bed which will also act as an irrigation pond.</p> <p>The onsite waste water treatment works will not be decommissioned as the treated effluent will be used for onsite irrigation. The development will however connect to the municipal sewer network when the connection becomes available. The waste water treatment plant will only treat the volume required for irrigation purposes.</p>
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PROPOSED SIMONDIUM MIXED USE DEVELOPMENT ON FARM 915 CUMBERLAND IN SIMONDIUM, WESTERN CAPE.

			<p>Kindly be informed that the D:PCM reserves the right to review the comments made should additional information become available.</p> <p>Please contact Shehaam Brinkhuis should you need to.</p>	
Evodia Boonzaier	19 July 2019	Email	<p>1. The above-mentioned document, dated 19 June 2019, as received by the Department of Environmental Affairs and Development Planning Directorate: Waste Management (the 'Department') on 19 June 2019, refers.</p> <p>2. The Department has reviewed the documentation and has the following comments:</p> <p>2.1 All green waste generated during the site clearing phase must be taken to an approved municipal or private green waste facility. The Department has initiated a 50% ban of organic waste from landfill by 2022 and a complete ban of organics to landfill 2027. It is therefore advised that organics be separated from the general waste stream and beneficiated where possible. Alternative treatment technologies for beneficiating this waste type must be considered.</p> <p>2.2 Construction and demolition waste (builder's rubble) must be properly managed and reused where possible. The applicant can source a copy of the guideline on the management of C&D waste from the Directorate: Waste Management at DEA&DP. The contact person is Dean Gilbert Tel: 021 483 8336.</p>	<p>This is noted and has been included as part of the EMP.</p> <p>This is noted and has been included as part of the EMP.</p>

PROPOSED SIMONDIUM MIXED USE DEVELOPMENT ON FARM 915 CUMBERLAND IN SIMONDIUM, WESTERN CAPE.

			<p>2.3 General waste produced during all phases of the development must be separated for recycling before being removed for waste disposal to landfill.</p> <p>2.4 Awareness is of utmost importance in minimising waste. Therefore, awareness and training must be implemented to all staff, contractors and visitors.</p> <p>2.5 It is acknowledged that the EMPr includes a Waste Minimization Plan and we are satisfied with the proposed waste minimization interventions. It is suggested that any illegal dumping of waste is kept record of either manually or electronically to be produced on request as stated in the EMP.</p> <p>3. The Department reserves the right to revise initial comments and request further information based on the information received.</p>	<p>This is noted and has been included as part of the EMP.</p> <p>This is noted and agreed.</p> <p>This is noted and agreed.</p>