



ENQUIRIES: Ms. Shehaam Brinkhuis

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Attention: Renier Kapp

COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (DBAR) FOR THE PROPOSED REZONING, SUBDIVISION AND DEVELOPMENT OF A MIXED USE DEVELOPMENT ON FARM CUMBERLAND NO.915, SIMONDIUM, WESTERN CAPE PROVINCE

The Directorate: Pollution and Chemicals Management (D: PCM) hereby acknowledges receipt of the DBAR for the proposed development and has the following comments:

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 types and extent of the industrial uses in order to estimate the potential pollution and contamination risk.
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 assessed (or addressed) within the DBAR.
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 EMPr. 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.

4. Limited information has been provided within the DBAR related to 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.
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 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 sewerage treatment plant, spills or significant erosion.
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.
7. Page 17 of the DBAR states that "*once municipal sewer capacity is upgraded in future the development will connect to the Drakenstein municipal network.*" Once this connection to municipal services has been made, please indicate if the on-site waste water treatment plant is to be decommissioned?

Kindly be informed that the D: PCM reserves the right to review the comments made should additional information become available.

Please contact Shehaam Brinkhuis should you need to.



RP Ms. Wilna Kloppers
Director: Pollution and Chemicals Management

Date: 19 July 2019.

CC: Ms. Samornay Smidt (DEA&DP: Development Management (Region 1))
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