



Directorate: Development Management
(Region 1)

REFERENCE: 16/3/3/6/7/2/B3/38/1253/18
ENQUIRIES: Ms. Saa-rah Adams
DATE: 08.10.18

The Board of Directors
ARUN Holdings (Pty) Ltd
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Attention: Mr H. Campbell

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Dear Sir

COMMENT ON THE PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE PROPOSED MIXED USE PRECINCT DEVELOPMENT ON ERF NO. 15712, WELLINGTON

1. The pre-application Basic Assessment Report ("BAR") dated 31 August 2018, received by the Department on 5 September 2018, and the Department's correspondence dated 13 September 2018, refer.
2. Following review of the information submitted to this Department, the following is noted:
 - 2.1. The proposal entails the redevelopment of old leather tannery evaporation ponds to accommodate the construction of business offices, shops, a hospital and light industrial and commercial uses with a development footprint of approximately 21ha located outside of the urban area.
 - 2.2. The southern portion of the development will be business premises and the hospital, which will be bordered to the north by green open space. The development of the light industrial and commercial uses will be constructed towards the northern boundary of the property.

- 2.3. The development of business erven (1-3) will accommodate an office park as well as a retail centre on erven 2 and 3. The proposed development includes the restoration of a historic farm house.
 - 2.4. The development of business erven (24-25), entails the development of business/ office spaces which can be used for either retail or offices.
 - 2.5. The proposed development on Institutional Erf no. 26 entails the construction of a hospital which accommodates 150 beds including specialist wards for maternity, medical paediatrics, surgical and mental health facilities.
 - 2.6. The proposed development of the light industrial and commercial erven (4-23) will be developed for light manufacturing and commercial use.
 - 2.7. The proposed development of the open space erven (27-29) will be utilised for storm water attenuation and will be landscaped to accommodate engineering services.
 - 2.8. The property is currently zoned Industrial Zone II limited to the evaporation ponds and is located east of Hermon Road (R44) and north of Oakdene Road, north of Wellington.
3. The following is the Department's provisional comment on the pre-application BAR:
- 3.1. The Department notes the specialist input from the various specialists and hereby requests input from a visual impact specialist. Comments from, but not limited to, the following relevant authorities must be obtained during the Public Participation Process and included in the BAR submitted for decision-making:
 - Department of Transport and Public Works;
 - Breede-Gouritz Catchment Management Agency;
 - CapeNature; and
 - Drakenstein Municipality
 - 3.2. The Department notes Heritage Western Cape's ("HWC") decision dated 20 August 2018, with respect to the requirement for a Heritage Impact Assessment ("HIA") for the proposed development.
 - 3.3. You are reminded that the relevant service providers are to provide written confirmation of sufficient capacity to provide the necessary services for the proposed development, specifically with respect to sewage and effluent disposal, waste management, storm water management, water and electricity supply. This is particularly relevant as the Civil and Electrical Engineering Services Report, dated May 2018, indicates upgrades to bulk services are required as the current capacity in some cases is insufficient for the purposes of catering to the proposed development. Please note that where such upgrades are required and will form a component of the proposed development, it is required that confirmation be provided on whether or not the applicable listed activities within the EIA Regulations are triggered. Please ensure that details of the associated infrastructure forms part of the development description and assessment, where appropriate.

- 3.4. On page 22 of the pre-application BAR, it is noted that the proposed development will require a water connection by means of constructing a new 200mm diameter supply line which will link to a new 315mm diameter link services line to be located within the R44 road reserve. The aforementioned proposed bulk water infrastructure pipelines and associated connections to the erven, is not included as part of this application. The Department hereby requests clarity regarding the application process for these pipelines and the implication thereof on the decision making process for the proposed development.
- 3.5. The applicant/EAP is reminded to include the following PPP information, in terms of the EIA Regulations, 2014, in the BAR for decision-making:
- Details of the public participation process undertaken in terms of regulation 41 of these Regulations, including copies of the supporting documents and inputs; and
 - A summary of the issues raised by Interested and Affected Parties ("I&APs"), and an indication of the manner in which the issues were incorporated, or the reasons for not including them.
- 3.6. In line with the information requirements of Appendices 1 and 4 of the EIA Regulations, 2014, please ensure the following is included in the BAR submitted to the Department for decision-making once formal application has been made:

For inclusion in the BAR:

- 3.6.1. The Surveyor General code of each cadastral land parcel;
- 3.6.2. A summary of the findings and impact management measures identified in any specialist report complying with Appendix 6 of the Regulations and an indication as to how these findings and recommendations have been included in the final report;
- 3.6.3. Any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation.

For inclusion in the EMPr:

- 3.6.4. The expertise of that EAP to prepare an EMPr, including a curriculum vitae;
- 3.6.5. A map of the proposed activity and its' associated infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided.
- 3.7. The following provisional comments have been provided by the Directorate: Development Management (Region 1) Regulatory Planning Advisory Service with respect to the proposed development and pre-application BAR:

3.7.1. The current zoning of the property is Industrial Zone II – limited to evaporation ponds. Under this zoning, noxious trade is the only primary use. The proposed land use for the property will no longer be noxious and will not impact negatively on the environment. The proposed development may contribute to the economic growth of the area by creating both temporary and permanent employment within the local community.

3.7.2. Western Cape Provincial Spatial Development Framework (PSDF) (2014)

Due to the siting of the proposed development in close proximity to the existing settlements the development can be regarded as spatially efficient. It is a compact, mixed use development with good accessibility. The proposed development can be regarded as in line with the principles of the PSDF.

3.7.3. The site is also indicated as part of proposed land use implications for key sites as earmarked for "Approved Future Development". It is, however, clear that the proposal is currently only partially compliant with the SDF, and the applicant will therefore be required to provide details regarding the deviation from the SDF before the proposed development can be supported. Therefore, written confirmation regarding the desirability of the proposed development within a land use planning context is required from Drakenstein municipality.

4. Please note that omission of any required information in terms of Appendices 1 and 4 of GN R, 982 with regards to the submission to the Department of the BAR and EMPr respectively may result in the application for environmental authorisation being refused.
5. The Department awaits the submission of the Application Form prescribed by Regulation 16 of the EIA Regulations, 2014.
6. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.
7. Please note that the activity may not commence prior to an environmental authorisation being granted by the Department. It is an offence in terms of Section 49A(1)(a) of the NEMA for a 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.

8. This Department reserves the right to revise or withdraw any comments or request further information from you based on any information received.

Yours faithfully



**HEAD OF COMPONENT
ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 1
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

CC: (1) Ms. C. Nel (Guillaume Nel Environmental Consultants)
(2) Ms. C. Winter (Drakenstein Municipality)

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