



**REFERENCE:** 16/3/3/6/7/1/E2/37/1016/20  
**DATE:** 6 September 2020

The Director  
Department of Transport and Public Works  
Private Bag X9185  
**CAPE TOWN**  
8000

**Attention: Ms. M. Hofmeyr**

Tel.: (021) 483 5713  
Email: [melanie.hofmeyr@westerncape.gov.za](mailto:melanie.hofmeyr@westerncape.gov.za)

Dear Madam

**COMMENT ON THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT ("BAR") IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS (GN NO. 326 OF 7 APRIL 2017) FOR THE PROPOSED REHABILITATION AND UPGRADING OF TRUNK ROAD 28 SECTION 2 (TR28/2) (R43) AND RELATED EXISTING DEGRADED STORMWATER INFRASTRUCTURE (CULVERTS), FROM KM 23.83 TO KM 43.88, BETWEEN STANFORD AND GANSBAAI**

1. The draft BAR dated 26 March 2020, refers.
2. The proposal will entail the following:
  - 2.1 Road rehabilitation and upgrade:
    - The narrow existing road cross-section is substandard and is to be upgraded to a Class 1 rural cross section. The carriageways will be widened from 3.2 m to 3.7 m each and 2 m surfaced shoulders will be added. ✓
    - Concrete lined side drains. ✓
  - 2.2 Storm Water Infrastructure (Culverts) upgrade:
    - At Km 24.088, the existing 450mm pipe culvert will be replaced with a 600mm pipe culvert.
    - At Km 24.138 the existing 1800mm (x2) pipe culverts will be replaced with 2400 x 1500 cast insitu box culverts.
    - At Km 24.198 the existing 600mm pipe culvert will be replaced with a 600mm pipe culvert. }
    - At Km 25.092 the existing 400mm pipe culvert will be replaced with a 600mm pipe culvert.
    - At Km 25.155 the existing 400mm pipe culvert will be replaced with a 600mm pipe culvert.
    - At Km 25.138 the existing 400mm pipe culvert will be replaced with a 600mm pipe culvert.
    - At Km 25.161 the existing 400mm pipe culvert will be replaced with a 600mm pipe culvert.
    - At Km 25.184 the existing 400mm pipe culvert will be replaced with a 600mm pipe culvert.

- At Km 25.200 a new 600mm new pipe culvert will be installed.
- 2.3 New apron slabs will be constructed at each of the upgraded culverts and erosion protection (gabions/reno-mattresses) will be constructed where required. ✓
3. Departmental comments on the draft BAR:
    - 3.1 Since all of the activities will be located within the road reserve, confirmation of the applicability of Activity 12 of Listing Notice ("LN") 1 must be provided. (expansion)
    - 3.2 Since the affected vegetation is not listed as endangered or critically endangered in terms of Section 52 of the National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004) ("NEMBA"), Activity 12 of LN 3 is not applicable. (remain within BAR)
    - 3.3 Since the road rehabilitation will widen the road by more than 4m in areas containing indigenous vegetation, Activity 18 of LN 3 is applicable. Please note that the application form must only include activities applicable to the proposed development. (added)
  4. Regulatory Requirements:
    - 4.1 Proof of the notifications sent to registered I&APs for the commenting purposes must be included in the BAR. ✓
    - 4.2 Any new representations and comments received in connection with the application must be included in the BAR.
    - 4.3 Any new responses by the EAP to the aforementioned representations and comments must be tabulated in a comments and response report that must be included in the BAR. ✓
    - 4.4 The minutes of any meetings held by the environmental assessment practitioner ("EAP") with I&AP's and other role players which record the views of the participants must be included in the BAR. ✓
    - 4.5 Please be advised that a signed and dated applicant declaration is required to be submitted with the BAR during the formal application process 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. ✓
    - 4.6 In addition to the above, please ensure that a signed and dated EAP and specialist declarations are also submitted with the BAR during the formal application process for decision-making. ✓
    - 4.7 You are furthermore reminded that the BAR must contain all the information outlined in Appendix 1 and 4 of the Environmental Impacts Assessment Regulations, 2014 (as amended). ✓
  5. Kindly quote the abovementioned reference number in any future correspondence concerning the proposed development. ✓

6. This Department reserves the right to revise or withdraw its comments and request further information based on any information received.

Yours faithfully

*pp Christoff*

**HEAD OF COMPONENT**

**ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 1**

**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Cc: (1) Mr. C. Dippenaar (GNEC)

Email: christoff@gnec.co.za

(2) Ms. P. Aplon (Overstrand Municipality)

Email: paplon@overstrand.gov.za