



Enquiries: Lauren King
Contact number: 021 807 4841
Reference: 51/4/1(13480)P
Date: 05 April 2019

Guillaume Nel Environmental Consultants
PO Box 2632
Paarl
7620

By email: eg@gnec.co.za

Attention: Euonell Visage

1ST DRAFT BASIC ASSESSMENT REPORT (DBAR): PROPOSED MIXED USE DEVELOPMENT, ERVEN 13480 AND 21128, PAARL (DEADP Ref. No.: 16/3/3/6/7/1/B3/28/1037/18)

Reference is made to the 1st Draft Basic Assessment Report (DBAR) for a proposed mixed used development on erven 13480 and 21128, Paarl. The development will consist of approximately 165 single residential units, 371 row houses/duplexes, 5 mixed use buildings (commercial and residential) and 3 community facilities. The entire property is approximately 13 hectares in extent of which approximately 3.19 hectares will be designated Public Open Space (POS).

The Environmental Management Division circulated the 1st DBAR to the following departments/divisions for comment: Engineering Services Department: Infrastructure Management; Planning and Development: Spatial Planning; Planning and Development: Land Use

Comments were received from the following departments/divisions:

Engineering Services Department: Infrastructure Management – L Pienaar (Annexure A)

Drakenstein Municipality currently has bulk infrastructure in the area to accommodate the proposed development. The proposed development is therefore supported, subject to a number of technical conditions being adhered to. Please see Annexure A for the full comment from this department.

Planning and Development: Spatial Planning – Louis Schlechter (Annexure B)

This application and proposed project has been in discussions within the Municipality for many years. Spatial Planning has seen the proposals and we are supportive of the proposed development. With reference to the Spatial Development Framework (SDF), 2018, the application site falls within the Urban Edge and its earmarked for Urban Infill. As per our previous discussions or comments, the developer is urged to beautify and mitigate the boundary along the N1 as it is the entrance and gateway into Paarl from Worcester.

Planning and Development: Land Use – Henk Strijdom (Annexure C)

No comments from a Land Use Planning and Surveying perspective.

EMD: Planning and Sustainability Section (Lauren King)

Having reviewed the 1st DBAR and associated Environmental Management Programme (EMPr), the Environmental Management Division finds the proposal for a mixed use development on the abovementioned erven desirable in principle. However, the preferred alternative, i.e. Layout Alternative 1, in its current form is not supported due to the following:

N1 Interface

The above proposed development is situated within or in close proximity to one of the gateways/entry points into Drakenstein Municipality along the N1, a route that has a high scenic quality and provides a unique sense of place. As per the Drakenstein Spatial Development Framework (SDF), entrance points to urban settlements require urban design interventions that will enhance the sense of place and not detract from it.

With this in mind, this Division is concerned about the negative interface that will be created with single residential dwellings backing onto the N1, albeit a 10m distance away. As provision is also made for the accommodation of backyard dwellers, backyard structures, which are often informal in nature, will become visible from the N1. Therefore, it is the opinion of this division that the current proposed interface will detract from the surrounding scenic landscape and the sense of place experienced when traveling along this section of N1.

Public Open Space (POS)

Very often public open spaces are perceived as dangerous spaces, which are not used in a positive manner and ultimately become places for illegal activity, crime and violence. People often have a fear of using these spaces as they feel vulnerable and isolated while doing so. Fragmented and poorly defined open spaces often attract anti-social activity and become dangerous spaces. Open spaces should therefore be consolidated into well-defined networks of interrelated spaces that are overlooked by development. Open spaces are well used when there is a good reason for people to use them. Therefore, when open spaces are created, they need to be designed with intent and not be leftover spaces that cannot be developed for any other purpose (City of Cape Town: Design and Management Guidelines for a Safer City; City of Cape Town: Urban Design Policy).

The arrangement and scale of public open spaces in the proposed development layout, as well as the interface of the surrounding development with these spaces are of concern. The layout does not provide for a positive interface with POS areas, as the majority of erven appear to be arranged so that the rears/back of properties face onto open spaces. This provides for little to no surveillance over open spaces, which could attract anti-social behaviour and result in pockets of unsafe and undesirable spaces. Open spaces with no clear intended use are also often susceptible to encroachments and the establishment of informal structures. The aforementioned guidelines and policy makes reference to a number of ways in which safer and active quality open space may be created. Some of these include:

- A road / footpath as the preferred interface between an open space and housing development, as it increases levels of visibility and facilitates access for management and maintenance. The road ensures that there is movement and activity along the edge of the open space, bringing life and eyes into the space throughout the day.
- Clustering and co-location of public facilities and open spaces, to bring surveillance and activity to open spaces throughout the day.

- Where appropriate public spaces should be associated with public institutions, community facilities, higher density developments and public roads and these public spaces should be overlooked to provide passive surveillance.

Noise Impacts

While potential noise impacts generated by the proposed development during the construction and operational phases are addressed in the report, it is of concern that noise impacts from the surrounding environment on the proposed development were not considered. Vehicular traffic noise from the N1, as well as events associated noise from the adjacent Eurolux Boland Agricultural Show Grounds could be a potential noise nuisance to residents of the proposed development if there are not sufficient noise barriers/buffers constructed or insulation measures implemented.

Other

The use of solar panels to generate electricity for the proposed development is supported. The water saving mechanisms listed on page 9 of the Services Report are also supported. However, it is unclear from the recommendation made who will be responsible for the installation of these mechanisms.

Environmental Management Programme (EMPr)

- Pg. 11, Section 2.1.5: Please specify the various role players and their specific responsibilities clearly.
- Pg. 16, Section 3.9: Please state that rectification/rehabilitation required as a result of non-compliance with the EMPr will be for the cost of the contractor, in addition to a fine being issued.
- Pg. 16, Section 3.9: Please state how the money from fines will be dealt with and what it will be applied for. It should be noted that this money must not be to the benefit of the developer, but should be applied to the benefit of the surrounding environment and community.
- Pg. 22, Botanical Constraints: Please add that a method statement for the recommended search and rescue must be provided. Such method statement must clearly state the details of the receptor site and include site preparation of the receptor site. It should be noted that on page 19 of the Botanical Impact Assessment Paarl Mountain Nature Reserve is specified as a receptor site. Confirmation with regards to a suitable receptor site within the nature reserve must be sought from the Reserve Manager.
- Pg. 24, Fauna: Please specify that the rescue and relocation of possible sensitive faunal species must be done by suitably qualified person.
- Pg. 50 Noise pollution: Please add that operation activities include deliveries and collections.

Recommendations

- It is recommended that a Visual Impact Assessment (VIA) be conducted to determine the visual impact of the proposed development and to provide mitigation measures in this regard.
- This Division recommends that the layout be revised, keeping in mind the design guidelines mentioned above, in order to create a safe and sustainable mixed use development capable of serving the socio-economic and environmental needs of the future residents.
- A Noise Impact Assessment (NIA) is recommended in order to determine the noise impacts, if any, on the proposed development and how these could be mitigated.

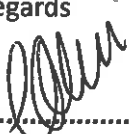
Conclusion

Having reviewed the application and circulated it to the relevant departments/divisions for comment, the Environmental Management Division (EMD) cannot find the above proposal (Layout Alternative 1) desirable

at this stage due to the above concerns raised. It is recommended that the above concerns and comments be addressed in the report to follow.

Should you wish to discuss the above comments, please do not hesitate to contact Lauren King (see above for contact details).

Kind regards



.....
C. WINTER

MANAGER: ENVIRONMENTAL MANAGEMENT

Annexure

Annexure A: Engineering Services Department: Infrastructure Management – L. Pienaar

Annexure B: Planning and Development: Spatial Planning – Louis Schlechter

Annexure C: Planning and Development: Land Use – Henk Strijdom

CC: Department of Environmental Affairs and Development Planning (DEA&DP)

Email: Mare-liez.Oosthuizen@westerncape.gov.za

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ANNEXURE A



DRAKENSTEIN

MUNISIPALITEIT • MUNICIPALITY • UMASIPALA

Paarl | Wellington | Gouda | Saron | Simondium

+27 21 807 4500 +27 21 872 8054
www.drakenstein.gov.za
records@drakenstein.gov.za
Civic Centre, Berg River Boulevard, Paarl 7646

Memo

To: EXECUTIVE DIRECTOR: PLANNING & ECONOMIC DEVELOPMENT
(ATTENTION: LAUREN KING)

From: MANAGER: INFRASTRUCTURE MANAGEMENT

Enquiries: L. PIENAAR

Reference number: 15/4/1 (13480 & 21128) P (0903)

EP Reference number: 16/3/3/6/7/1/B3/28/1037/18

Date: 01 April 2019

Subject: PROPOSED MIXED USE DEVELOPMENT ON ERVEN 13480 AND 21128,
PAARL

1. WATER

Drakenstein Municipality currently has bulk infrastructure in the area that can accommodate the proposed development. Furthermore, the following conditions must be adhered to;

- 1.1. Water connections will be provided for every single residential unit, each duplex unit, mixed-use units and community facilities (which includes a place of worship, day care facility, informal trading area and a taxi rank);
- 1.2. Water saving devices must be installed in all toilets, bathrooms and basins;
- 1.3. Any existing system that is to remain shall be upgraded to minimum municipal standards; and
- 1.4. 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.

2. WASTEWATER

Drakenstein Municipality currently has bulk infrastructure in the area that can accommodate the proposed development. Furthermore, the following conditions must be adhered to;

- 2.1. Sewer connections will be provided for each single residential unit, each duplex unit, mixed used units and community facilities (which includes a place of worship, day care facility, informal trading area and a taxi rank);
- 2.2. A connection manhole must be constructed at the connection point to a maximum depth of 1m;
- 2.3. The developer shall install adequately sized fat traps in the commercial and community units as approved by Drakenstein Municipality; and

2.4. Any existing system that is to remain shall be upgraded to minimum municipal standards.

3. STORMWATER

Drakenstein Municipality currently has bulk infrastructure in the area that can accommodate the proposed development. Furthermore, the following conditions must be adhered too;

3.1 A Stormwater Management Plan (SWMP) must be submitted to this department for approval;

3.2 Any new stormwater networks will be the responsibility of the developer, including all internal and bulk connectors;

3.3. Pollution control measures to mitigate chemical and solid pollution must be provided at inlet and outlet structures as may be relevant;

3.4. Only pre-development run-off of a 1:5 year storm event will be accepted into the existing system. Provision must be made to accommodate the detention of run-off for a 1:50 year storm event;

3.5. Contaminated run-off (washing water, stormwater, etc) must be disposed of in such a manner so as not to cause any pollution to surface, groundwater or create a nuisance;

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 stormwater run-off taking place, especially during the rainy season; and

3.7. Provision must be made for an effective rainwater 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.

4. ROADS

Access to the premises will be obtained via Langehoven Avenue. Furthermore, the following conditions must be adhered too;

4.1 Any new roads/streets and accesses will be the responsibility of the developer, including all internal and bulk connectors; and

4.2 Any alterations to the existing road network will be the responsibility of the developer which includes design, approval and construction of any additional traffic control and or traffic calming measures as detailed in the Traffic Impact Assessment (TIA) of Sturgeon Consulting dated January 2019.

5. SOLID WASTE

Drakenstein Municipality currently has sufficient capacity at its landfill to accommodate the proposed development. Furthermore, the following conditions must be adhered too;

5.1 The Municipality undertakes, after proclamation of the township, to remove household refuse in accordance with its by-laws and shall make its own arrangements with the occupants of in the township, for the removal of such household refuse.

6. GENERAL

- 6.1 Further comments will be given if an application in terms of the Drakenstein Municipality: Land Use by-law is received;
- 6.2 Any upgrading to bulk infrastructure can be offset against any Development Contributions payable for the proposed development;
- 6.3 The developer is also responsible the funding of all connections to the bulk services and all internal works;
- 6.4 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 for 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 Drakenstein Municipality for approval prior to the commencement of construction;
- 6.5 All works where applicable shall be constructed to at least the minimum standards as set out in, Engineering Services: Municipal Standards;
- 6.6 A comprehensive operational infrastructure management plan shall be drawn up and submitted for approval by the Civil Services Department;
- 6.7 A set of accurate as built drawings as per Drakenstein Municipality: Civil Engineering Department's Standards must be submitted at the practical completion inspection; and
- 6.8 The above conditions are to be complied with in stages.
- 6.8.1 Requirements associated with the preparation of plans, drawings, permits, agreements and approvals. These shall be complied with prior to construction;
- 6.8.2 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 or occupation of any property/building in the phase; and
- 6.8.3 Requirements associated with the long term operations. Proof of compliance must be available on request.



LP PIENAAR (Pr. Eng)

MANAGER: INFRASTRUCTURE MANAGEMENT

I:\DEVELOPMENT APPLICATIONS\15 town planning\15-4-1\2019\Service capacity comments\Erven 13480 + 21128 P.docx
LP/lhs

ANNEXURE B

Lauren King

From: Louis Schlechter
Sent: Wednesday, March 27, 2019 8:33 AM
To: Lauren King
Cc: Wayne Hendricks
Subject: RE: Erven 13480 & 21128, Paarl DBAR - Deadline for comment: 29 Mar 2019
Attachments: RE: Draft Lay Out: Paarl East Cricket Field

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Lauren

This application and proposed project has been in discussions within the Municipality for many years now. Spatial Planning has seen the proposals and we are supportive of the proposed development.

SDF (2018):

The application site falls within the Urban Edge and its earmarked for Urban Infill.

As per our previous discussions/ comments (see email attached), we urge the developer to beautify and mitigate the boundary along the N1 as it is the entrance and gateway into Paarl from Worcester.

From: Wayne Hendricks
Sent: Monday, March 25, 2019 8:07 AM
To: Louis Schlechter <Louis.Schlechter@drakenstein.gov.za>
Cc: Lauren King <Lauren.King@drakenstein.gov.za>
Subject: FW: Erven 13480 & 21128, Paarl DBAR - Deadline for comment: 29 Mar 2019

More Louis

Kan jy asseblief vir my na hierdie aansoek kyk en kommentaar deur gee.

Dankie

Wayne

From: Lauren King
Sent: Tuesday, March 19, 2019 12:53 PM
To: Lawrence Smith <Lawrence.Smith@drakenstein.gov.za>; Wayne Hendricks <Wayne.Hendricks@drakenstein.gov.za>; Henk Strijdom <HenkS@drakenstein.gov.za>
Cc: David Delaney <DavidD@drakenstein.gov.za>; Cindy Winter <Cindy.Winter@drakenstein.gov.za>; Louis Pienaar <Louis.Pienaar@drakenstein.gov.za>
Subject: Erven 13480 & 21128, Paarl DBAR - Deadline for comment: 29 Mar 2019

Dear All,

The Environmental Management Division is are tasked with co-coordinating and collating internal Department/Division comments for environmental processes undertaken in terms of the Environmental Impact Assessment (EIA) Regulations promulgated in terms of the National Environmental Management Act of 1998 (no 107 of 1998), as amended.

Lauren King

From: Henk Strijdom
Sent: Thursday, March 28, 2019 4:40 PM
To: Lauren King
Subject: RE: Erven 13480 & 21128, Paarl DBAR - Deadline for comment: 29 Mar 2019

Lauren

No comments from a Land Use Planning & Surveying perspective.

Regards

Mr Henk Strijdom
Manager: Land Use Planning and Surveying

t: +27 21 807 4830
c: +27 82 337 6324
f: +27 21 870 1562
e: henks@drakenstein.gov.za
a: Nedbank Building, cnr Breda Street and Berg River Boulevard, Paarl 7646



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SAVE WATER / BESPAAR WATER

From: Lauren King
Sent: Tuesday, March 19, 2019 12:53 PM
To: Lawrence Smith <Lawrence.Smith@drakenstein.gov.za>; Wayne Hendricks <Wayne.Hendricks@drakenstein.gov.za>; Henk Strijdom <HenkS@drakenstein.gov.za>
Cc: David Delaney <DavidD@drakenstein.gov.za>; Cindy Winter <Cindy.Winter@drakenstein.gov.za>; Louis Pienaar <Louis.Pienaar@drakenstein.gov.za>
Subject: Erven 13480 & 21128, Paarl DBAR - Deadline for comment: 29 Mar 2019

Dear All,

The Environmental Management Division is are tasked with co-coordinating and collating internal Department/Division comments for environmental processes undertaken in terms of the Environmental Impact Assessment (EIA) Regulations promulgated in terms of the National Environmental Management Act of 1998 (no 107 of 1998), as amended.

Please review the 1st Draft Basic Assessment Report (BAR) for the proposed mixed use development on erven 13480 and 21128, Paarl and provide comment to me (Lauren King) by no later than **29 March 2019**. Comments in memo format are preferred, but email comments will also be in order.

Please take note: The purpose of providing comment is to review the documents from a technical perspective (and not to take a decision such as support or object). As such, when commenting on this application, please highlight