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STRATEGIC ENVIRONMENTAL FOCUS

COMMENT AND RESPONSE REPORT

SUPPORTING THE

FINAL BASIC ASSESSMENT REPORT FOR THE CONSTRUCTION OF THE SEWERAGE CONNECTION AND STORMWATER INFRASTRUCTURE FOR THE WEST END OFFICE PARK, CENTURION, GAUTENG

Prepared for:

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Submitted to:

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SUMMARY OF COMMENTS RAISED	INTERESTED AND AFFECTED PARTY	METHOD & DATE OF COMMUNICATION REPORT VERSION	SUMMARY OF RESPONSES	REPORT REFERENCE
1 COMMENTS ON THE IDENTIFIED IMPACTS				
<ul style="list-style-type: none"> The City of Tshwane Metropolitan Municipality (CoT); Environmental Management Services Department stated that they support the application subject to the consideration and adherence to the recommendations or comments that they submitted; Erosion control measures should be implemented to prevent loss of existing and remaining topsoil on site; It is recommended that an adequate maintenance and monitoring plan is implemented to monitor post-construction rehabilitation, particularly with regards to erosion control and vegetation reinstatement; and A Rehabilitation Plan should be implemented immediately after the construction and should aim to prevent erosion and aid the return of natural, endemic and indigenous vegetation cover to at least 80% of the rehabilitated area. The proposed Rehabilitation Plan should be included as part of the final and approved EMP. Rehabilitation shall be conducted on all areas affected by the proposed construction and must include road reserves, construction camp area and any other disturbances. 	City of Tshwane Metropolitan Municipality: Environmental Management Services Department	Email (11-08-2014)	<p>The comments and recommendations made by the CoT have been noted and considered. The EMP includes the mitigation measures and mitigation measures that will address the recommendations made by the CoT.</p> <p>Recommendations for the maintenance and monitoring have been included in the EMP that has been submitted to the Competent Authority for approval. The Rehabilitation Plan includes the Monitoring Plan that will be implemented subsequent to post rehabilitation to ensure that the purpose of rehabilitation is served. As recommended in the Rehabilitation Plan, indigenous and non-invasive grass and plants will be used during the rehabilitation of the site.</p>	
<ul style="list-style-type: none"> The rehabilitation of the sewerage and stormwater infrastructure should ensure that no ponding occurs on the dolomite which could increase the risk of sinkhole 	Gautrain Management Agency (GMA)	Hand delivered (12-08-2014)	<p>Comments noted.</p> <p>The impacts identified by the GMA</p>	

<p>formation;</p> <ul style="list-style-type: none"> • Cumulative impacts on the structural integrity and operational requirements of the Gautrain have not been considered (e.g. cumulative impact from various developments in the area, e.g. Die Hoewes X283, on the dolomite potentially impacting the stability of the Gautrain viaduct structure); • The GMA pointed out impacts that should have been considered in the Draft BAR: <ul style="list-style-type: none"> ○ Dust caused during construction impacting on the Gautrain trains; ○ Potential increase on bird strikes on Gautrain trains due to the disturbance of bird habitat during the construction of sewerage and stormwater pipelines or culvert; ○ Overflowing of the stormwater culvert adjacent to the Gautrain alignment and resultant erosion impact on the Gautrain viaduct structure; ○ Influx of people into the area seeking employment during the construction phase could impact negatively on the Gautrain rail reserve. This influx could also increase criminal activities in the area. Impacts include vagrants, informal settlements, defacing viaduct pier structures, illegal dumping of construction rubble etc. • The mitigation measures identified should be made more practically implementable (e.g. how would the vicinity of stormwater inlets be cleared of all potential pollutants which may ultimately result in the creation of sinkholes should the infrastructure constructed start leaking 			<p>have been considered and included in the EMP, along with the adequate mitigation measures.</p> <p>It should however be noted that the proposed sewerage and stormwater infrastructure is not located adjacent in close proximity to the Gautrain alignment. Also, the Gautrain alignment is located up the slope, to the north location of the proposed infrastructure. The stormwater outlets will discharge water into the watercourse located to the south of the locations of the proposed infrastructure. In light of the above, Environmental Assessment Practitioner (EAP) is confident that the proposed stormwater infrastructure will have no erosion related impacts on the Gautrain alignment.</p> <p>It is unlikely that the dust resulting from the construction activities will impact on the Gautrain trains. The construction is not of great magnitude and it is not in close proximity to the Gautrain alignment. In between the location of the proposed infrastructure and the Gautrain alignment there is a West End Office Park that is currently</p>
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<p>overtime);</p> <ul style="list-style-type: none"> • The contact details of the ECO and Environmental Site Officer (ESO) should be made available to the GMA and the Bombela Operating Company by the applicant prior to construction starting; • The weighting factor used in the determination of the significance of the impacts should be at least medium to high for impacts on the Gautrain (as per the explanation of ranking, weighting and scaling on page 20 of the Draft BAR); and • The EAP needs to ensure that any SHEQ risks or impacts imposed by the development to the operation of the Gautrain system can be mitigated. 			<p>under construction.</p> <p>Considering that the proposed project is not of great magnitude and there is already construction of the West End Office Park on the greater site, it is unlikely that the proposed project will have significant impacts on the influx of the people looking for jobs, crime and other related factors. There is already an informal settlement between the Gautrain alignment and the West End Office Park. This is currently being dealt with by the City of Tshwane</p>	
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2 COMMENTS RELATED TO THE EMPr

<ul style="list-style-type: none"> • Experience has shown that there is an increased occurrence of illegal waste dumping under the Gautrain viaduct which borders the proposed development to the east during the construction of adjacent sites. Practical mitigation measures need to be identified by the Environmental Assessment Practitioner (EAP) and included in the Environmental Management Programme (EMPr) to manage this problem during and after the construction of the proposed development; • The EMPr's Table 1 needs to be updated with the additional impacts identified in this letter; • The EMPr should also cover operational activities to cover compliance to the Gautrain Water Management 	<p>Gautrain Management Agency (GMA)</p>	<p>Hand delivered (12-08-2014)</p>	<p>To address the issue of illegal waste dumping, the EMPr recommended that waste be classified on site and for recycling to be prioritised. It has been made a requirement to keep the records of all the waste taken from site to be disposed of.</p> <p>It has been recommended that an ECO monitor compliance to waste management on site during the construction phase of the project.</p> <p>The impacts identified by the GMA</p>	
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Plan Guidelines.			have been added into the EMPr accordingly. Compliance to the Gautrain Water Management Plan Guidelines has been made one of the requirements of the EMPr.	
<ul style="list-style-type: none"> An Environmental Management Plan (EMP) should be included with EIA Report. The EMP must address impacts and mitigation measures for the pre-construction, construction and post-construction activities. All issues and recommendations should be included within the final and approved EMP. An Environmental Control Officer (ECO) and contact details should also be included within the EMP; 	City of Tshwane Metropolitan Municipality: Environmental Management Services Department	Email (11-08-2014)	<p>All the recommendations and identified impacts for the pre-construction, construction and post-construction phases of the project have been addressed in the EMPr, which forms part of the Final BAR.</p> <p>Once the EMPr has been approved by the competent authority, the ECO will be appointed by the applicant and the contact details of the ECO will be made available as per the recommendations.</p>	

3 COMMENTS RELATED TO STORMWATER MANAGEMENT

<ul style="list-style-type: none"> The proposed sewerage pipelines and stormwater infrastructure will be constructed on dolomite, given the real risk of sinkhole formation adjacent to the Gautrain rail reserve in the area, the GMA requests that a detailed development-specific dolomite investigation be undertaken as part of the Basic Assessment (BA) process; It is noted that one of the proposed stormwater drains are situated in close proximity to the Gautrain alignment, as a result, the Draft Basic Assessment Report (BAR) does 	Gautrain Management Agency (GMA)	Hand delivered (12-08-2014)	<p>There have been Geotechnical Investigations undertaken on the bigger site. The recent investigations were in 2007 and 2013. These investigations did assess possible impacts of the establishment of the office park on the site underlain by the Dolomite.</p> <p>The Geotechnical Report (see Appendix G) was submitted to the</p>	
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<p>not conform to the requirements of Revision 3 of the Gautrain Water Management Plan Guidelines which is a requirement as a result of recommendations made by the Council of Geoscience and endorsed by the Gauteng Department of Agriculture and Rural Development (GDARD) flowing from the Centurion Variant Route Alignment of Decision (Gaut 002/2/35) and which are applicable to all wet services and stormwater drainage infrastructure within a certain distance (as indicated in the Guidelines) from the Gautrain rail reserve</p> <ul style="list-style-type: none"> • The description of alternatives does not include the stormwater infrastructure; and • The list of Method Statements should be expanded to include the design of the stormwater infrastructure and should include the detailed design drawings of the stormwater infrastructure inside the Water Management Corridor indicated in the Gautrain Water Management Plan Guidelines and should be submitted to the GMA for verification. 			<p>Council of Geosciences which approved it and made some recommendations. The report did consider the installation of the sewerage and storm water infrastructure. Recommendations made on such report will be implemented to ensure that there is compliance to the Gautrain Water Management Plan Guidelines and ultimately less or no impacts on the dolomite and the Gautrain Alignment.</p> <p>The Dolomite Map has been provided on Appendix 1. It is evident from the Dolomite Map that the proposed sewerage pipeline is not located on the dolomite, but some units of the stormwater infrastructure are located on the dolomite. As recommended in by the Geotechnical Report, a <u>site specific Dolomite Risk Management Plan will be put in place and implemented on site.</u></p> <p>The stormwater outlet that was referred to is not located in close proximity as it may be interpreted from the locality map that was provided in the Draft BAR. This was due to the data accuracy issues. The layout</p>	
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			<p>plans that were provided in Appendix C of the Draft BAR clearly show that that the stormwater outlet is not in close proximity.</p> <p>It has been stated in the BAR that there are no alternatives for both the sewerage pipeline and the storm water infrastructure. For the stormwater infrastructure, this is mainly because of their locations were informed by the approved layout of the West End Office Park and the physical attributes of the site.</p>
<ul style="list-style-type: none"> The CoT stated that the stormwater management on site should aim for the fast and efficient disposal of water into the surrounding and existing drainage systems. Also, it is the responsibility of the applicant to ensure that stormwater entering the surrounding drainage system is not contaminated by spilled chemicals. 	<p>City of Tshwane Metropolitan Municipality: Environmental Management Services Department</p>	<p>Email (11-08-2014)</p>	<p>The comments have been noted. The stormwater outlets will discharge water into the Hannops River (also referred to as the Sesmyl). A necessary application process (Water Use License Application) will be undertaken prior to commencement of the activity (discharging water into the river).</p>
<p>4 COMMENTS RELATED TO COMPLIANCE WITH OTHER LEGISLATION AND POLICIES</p>			
<ul style="list-style-type: none"> The construction of pipelines will result in alterations of the banks of Hennops River which either requires a Section 21 (c) and (i) Water Use License Application (WULA) or a General Authorisation in terms of the National Water Act (Act No. 36 of 1998). The GMA 	<p>Gautrain Management Agency (GMA)</p>	<p>Hand delivered (12-08-2014)</p>	<p>The DWS has been consulted regarding the WULA process. Construction activities will only commence once the WUL and all other necessary approvals have been obtained by the applicant.</p>

<p>requests for opportunity to comment on the Draft WULA</p> <ul style="list-style-type: none"> The GMA pointed that the requirements of the Gauteng Transport Infrastructure Act (Act No. 8 of 2001) must be taken into account; and The mitigation measures proposed in the Draft BAR do not comply with the requirements of the Gautrain Water Management Plan Guidelines. 			<p>Requirements of the Gauteng Transport Infrastructure Act (Act No. 8 of 2001), particularly Part 4 and Part 6 have been taken into consideration.</p> <p>Mitigation measures have been updated in order to comply with the requirements of the Gautrain Water Management Plan Guidelines.</p>	
<ul style="list-style-type: none"> The department states that it is the responsibility of the applicant to comply with the water use legislation and apply for a Water Use License with the DWS according to the National Water Act of 1998; The proposed development and functioning of the activity must comply with the Occupational Health and Safety Standards as set out in the Occupational Health and Safety Act No. 85 of 1993 at all times; and All activities on site must comply the Tshwane Municipality By laws. 	<p>City of Tshwane Metropolitan Municipality: Environmental Management Services Department</p>	<p>Email (11-08-2014)</p>	<p>As stated above, the DWS has been consulted regarding the WULA process. Construction activities will only commence once the WUL and all other necessary approvals have been obtained by the applicant.</p> <p>Compliance to the Occupational Health and Safety Act No. 85 of 1993 and CoT municipal B-laws has been made a requirement of the EMPr</p>	
<p>5 GENERAL COMMENTS</p>				
<ul style="list-style-type: none"> Cllr Napier acknowledged the notification and thanked SEF for the information about the project. He stated that he trusts that the project will proceed smoothly and reach completion. 	<p>Cllr C. J. Napier (Ward 57)</p>	<p>Email (07-07-2014)</p>	<p>Comment noted, thank you.</p>	
<ul style="list-style-type: none"> The Flood line Certificate indicating the 1:100 year flood line position against the proposed development shall be 	<p>City of Tshwane Metropolitan Municipality:</p>	<p>Email (11-08-2014)</p>	<p>As illustrated in the layout plans (Appendix C), the proposed</p>	

<p>submitted to the department for perusal. The department requires that the proposed development be located outside the 1:100 year flood line and the watercourse according to Department of Water Affairs (DWA) requirements.</p>	<p>Environmental Management Services Department</p>		<p>infrastructure is mostly located outside the 1:100 flood line (except for two new manholes).</p> <p>Adherence to the Terms and conditions stipulated in the WUL to be issued by the DWS is one of the requirements of the EMPr.</p>	
<ul style="list-style-type: none"> The GMA requested that an indication be provided by the EAP when the Final BAR and EMPr will be made available for public review. 	<p>Gautrain Management Agency (GMA)</p>	<p>Hand delivered (12-08-2014)</p>	<p>The representatives of the GMA will be notified when the Final BAR is available for public review and comments.</p>	