



## **Development Planning, Environment & Management Unit Environmental Planning & Climate Protection Department**

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OUR REFERENCE: EIA/844  
EDTEA: DM/0039/2014

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### **CONSOLIDATED CITY COMMENT: DRAFT BAR: PROPOSED EMANSOMINI PEDESTRIAN BRIDGE OVER MBOKODWENI RIVER.**

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Herewith find the consolidated City comment on the draft **Basic Assessment Report** for the proposed Emansomini pedestrian bridge.

**1. DURBAN SOLID WASTE (DSW):**

DSW has no requirements for this proposal.

**1. STRATEGIC SPATIAL PLANNING BRANCH:**

The Strategic Spatial Planning Branch (SSPB) has no objections to the draft Basic Assessment Report for the proposed Emansomini pedestrian bridge crossing the Mbokodeni River between Umlazi and Emansomini.

**2. DISASTER MANAGEMENT:**

No concerns from this department

**3. ETHEKWINI HEALTH:**

No objection is raised in principle subject to the maintenance and cleanliness of chemical toilets at all times. The chemical toilet effluent must be disposed of in an approved manner and a disposal certificate must be submitted to the Environmental Health Department, South 2 Area, Amanzimtoti. Once the construction resumes, Department of Health must be notified.

#### **4. ENVIRONMENTAL PLANNING & CLIMATE PROTECTION DEPARTMENT:**

Following review of the Draft Basic Assessment Report, this Department has the following comment:

The two proposed bridge sites (to the west and to the east) are across Mbokodweni River and have been included within the Durban Metropolitan Open Space System (D'MOSS) which is protecting the stream and the associated floodplain wetland.

Although the river system is considered disturbed due to the existing informal footbridge (western site) and sand mining activities, the system is still providing ecological connectivity to other systems downstream. All efforts must therefore be made to improve its ecological condition.

Please note that the western site already has an existing informal footbridge, has less wetland vegetation and therefore recommended by this Department.

In addition to the floodplain wetland, the eastern site is however adjacent to a patch of Scarp Forest. Provision of a bridge across this site will expose this patch of forest to further human encroachment due to improved access. This site is therefore not recommended.

##### **Alternatives:**

This Department had during the Background Information stage of the EIA process recommended that alternative bridge designs such as a suspension bridge be considered. It is this Department's belief that the active channel bed and banks of the stream are sensitive habitats and therefore should be spanned. All direct physical impacts must also be avoided.

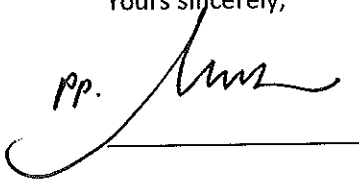
This concern has however not been addressed due to reasons cited in the Comments and Responses Report, i.e time and cost constraints. This is of concern, more so because Section 2.1(b) of the BAR requires that alternatives are considered. This section of the BAR has not been adequately addressed, including the No-Go alternative which is compulsory.

It has been noted that the scope of work in the Wetland and Riparian Zone Assessment Report prepared by GCS (page 35) was based on a conceptual design with no definite clarity on the bridge's central pier/plinth's location. The This Department recommends that the central bridge pier/plinth is not located within the active channel bed and banks. This will avoid the need for access by heavy machinery across and into the construction site.

A Method Statement for construction within the floodplain wetland and all sensitive habitats must also be included in the EMP.

Once the designs are finalised, the rehabilitation measures proposed in the Wetland and Riparian Zone Assessment Report prepared by GCS as well as those presented in the EMP must be revised to be specific to the approved design.

Yours sincerely,

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**C.N. THENGWA**

**Manager: Biodiversity Impact Assessment**

**Environmental Planning and Climate Protection Department**

**Date: 04.12.2015**