



**DEVELOPMENT PLANNING, ENVIRONMENT & MANAGEMENT UNIT**  
**Development Planning Department**  
**Land Use Management Branch**

**Our Ref.:** (21/11) DPM/EIA 736(C & IW)  
737 (IW & OW)

**DEDTEA:** -

**Enquiries:** Mrs D. van Rensburg

**Telephone:** 031 – 3117136

29 September 2016

ACER (Africa) Environmental Consultants  
P.O. Box 503  
Mtunzini  
3897

**Att: Ashleigh Mckenzie**

Dear Sir/Madam,

**RE: BACKGROUND INFORMATION DOCUMENT FOR THE PROPOSED CAPACITY IMPROVEMENTS TO NATIONAL ROUTE 2 (N2) AND NATIONAL ROUTE 3 (N3).**

With reference to the abovementioned Background Information Document please be advised that various Municipal Departments have had sight of the proposal and the following comments are submitted for your attention:-

**1. eThekweni Electricity Department.**

The H.V. Operations is affected by the proposal and this Department will need to see plans, once available, and change in ground levels prior to construction. Further, **please note:**

- 1.1. The applicant must consult eThekweni Electricity's mains records (held in the drawing office at eThekweni Electricity Headquarters, 1 Jelf Taylor Crescent, for the presence of underground electrical services. In addition should any overhead line and/or servitude be affected, the specific permission of the Head: Electricity must be sought regarding the proposed development.
- 1.2. The relocation of MV/LV electrical services, if required in order to accommodate the proposed development, will be carried out at the expense of the applicant.

## **2. Environmental Planning and Climate Protection Department.**

This Department has reviewed the Background Information Document and presents the following comment:

- This Department has already engaged extensively with the EAP for this project and has highlighted areas of sensitivity and concern regarding the proposed project.
- As previously detailed, the areas of concern include (but are not limited to):
  - River and DMOSS areas associated with the proposed bridges near the Pavilion Shopping Centre, Paradise Valley Nature Reserve and Giba Gorge Environmental Precinct;
  - Areas of DMOSS located in close proximity to the road reserve;
  - Areas of environmental sensitivity not affected directly by the road widening but likely to be impacted through ancillary activities such as lay-down areas, site camps and access routes.
- Comprehensive assessment of the impacts to these above identified sensitive areas will be required, together with detailed assessments of alternatives (routing and construction alternatives).
- Impact avoidance and mitigation will need to be detailed and outlined in detail given the sensitivity associated with portions of the planned route.
- A Water Use Licence must be obtained in terms of Section 21c & i of the National Water Act (36 of 1998) for the proposed activities.

Notwithstanding the above, this Department will comment further on the Draft Basic Assessment Report.

## **3. Land Use Management Branch.**

Given the broad scope of the proposals it is difficult to comment on the exact properties which will be affected by the proposal however any Removal of Restrictive Condition of Title, subdivision, consolidation or rezoning, which may be required, involving privately owned land not zoned for Road Reserve purposes, will trigger a PDA application to be lodged with this Department.

## **4. Strategic Spatial Planning Branch.**

- 4.1. This Branch has reviewed the above mentioned Document and has no objection in principle to the process outlined in the Background Information Document to obtain an Environmental Authorisation for the proposed work along the N2 and N3 within the eThekweni jurisdiction. The proposal will allow for future growth since national routes are considered as economic arteries.
- 4.2. This Branch reserves the right to comment further on the processes to follow as the proposal forms part of the Strategic Infrastructure Projects (SIPs), documented in the National Development Plan 2011, traversing eThekweni region.

**5. Coastal, Stormwater and Catchment Management.**

The impact on storm water runoff, of the increase in hardened area due to the upgrades must be assessed and mitigated against.

**6. Parks, Leisure and Cemeteries.**

This Department requires the full set of documents for the BA1, N2 and N3 upgrade (Edwin Swales Drive to Wiggins Road and EB Cloete exchange to Paradise Valley) and for the BA2 N3 upgrade (Paradise Valley to Key Ridge), in order to provide accurate comments.

**7. Geotechnical Engineering Branch.**

No geotechnical objection in principle to the upgrades.

Geotechnical investigations will be required where widening by cutting may impact slope stability or where filling onto poor subgrade could induce excessive settlements. New bridge structures will also require founding investigations.

**8. Human Settlement: Planning.**

This Department will provide a comment on the Draft Basic Assessment Report once more information is available.

**9. eThekweni Transport Authority.**

No comment received.

**10. Environmental Health Department.**

This Department raises no objection to the above proposal, however the following conditions/requirements must be complied with:

**10.1. Air Quality.**

There will be significant volumes of dust generated during the demolition and construction phase. The Developing Companies must document mitigation measures to reduce dust emissions to volumes which would not constitute a health hazard or dust nuisance. All activity must only operate between 08h00am – 18h00pm, further reducing impacts on the neighbouring community.

**10.2. Noise.**

There will be a significant increase in the frequency of noise events during the demolition and construction phase. The Developing Companies must document mitigatory measures to reduce the frequency of noise events to levels which would not constitute noise

- nuisance. All activity must only operate between 08h00am – 18h00pm, further reducing impacts on the neighbouring community.
- 10.3. Waste.  
Hazardous waste removed from the site must be documented, handled, transported and disposed in compliance with National Environmental Management Waste Act of 2008.
  - 10.4. Ensure the use of formal pedestrian facilities by means of adequate signage.
  - 10.5. It is important to note that the proposed expansion must be conducted in such a manner so as to not impact on the quality of life of the employees or the surrounding Industrial or Residential Community. Should any problems arise as a result of the proposed upgrade, this Department reserves the right to call for further mitigatory measures.
  - 10.6. The Department of Water and Sanitation (DWS/Neo Leburu, [Leburun@dws.gov.za](mailto:Leburun@dws.gov.za) telephone, 0828052023, would be the commenting authority with regards to the Water Use Licence.

Compliance with the above must be effected in liaison with the Department.

## **11. eThekweni Water and Sanitation Department.**

- 11.1. Comments from Wastewater Network Operations West and Central:  
All sewer reticulation that exist within or traverse the road reserve must be identified and all necessary preventative measures need to be taken to ensure that the sewer services are not interrupted. All protection measure must be approved by Wastewater Network.  
In the event of sewer services requiring to be realigned such realignment must be approved by Wastewater Network.
- 11.2. Comments from Water Planning Branch:  
There is no objection to the proposed however the following must be taken into account;
  - 11.2.1. It should be noted that the position of the pipe as indicated on GIS is a guide and site verification is essential to confirm the exact location of the pipes.
  - 11.2.2. All relocation cost to be borne by the developer should there be a need to relocate watermains.
  - 11.2.3. The proposed location of the pipe to comply with the policies of the asset owner.
  - 11.2.4. Details of the relocation pertaining to location depth, pipe material etc to be obtained from the Design Department.

## **12. Durban Solid Waste.**

This Department has no requirements for this proposal.

## **13. Disaster Management.**

No comment from this Department.

**14. Fire Safety.**

This Department has no objection to the above mentioned proposal subject to:

- 14.1. Full compliance with the petroleum product or flammable gas pipeline in close proximity.
- 14.2. Compliance with road closure during construction period regarding response time for the brigade and other emergency services.
- 14.3. Full compliance with other applicable Legislative requirements.

Should you seek clarification on any of the above issues, please contact the writer on telephone: 031 - 3117136 or via e-mail: [diane.vanrensborg@durban.gov.za](mailto:diane.vanrensborg@durban.gov.za) In addition, the Department requests that a copy of the Environmental Authorisation be emailed to the same address.

Yours faithfully



3/10/2016.

**MANAGER: LAND USE MANAGEMENT**  
(Claire Norton: Professional Planner A/746/1993)



sep/10/2016

**ACTING HEAD: DEVELOPMENT PLANNING, ENVIRONMENT AND  
MANAGEMENT**

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