



# Parks, Recreation and Culture Unit

PARKS, RECREATION AND CULTURE

## Parks, Leisure and Cemeteries

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**TO : DIANE VAN RENSBURGH – DEVELOPMENT PLANNING**  
**FROM : SR WHITAKER : ACTING DEPUTY HEAD**  
**PARKS, LIESURE AND CEMETERIES**

**DATE : 30/10/2018**

**PLC REF No : 25/4**

**TRACKING No :**

**SUBJECT : DPM/EIA 736(C&IW) AND (IW&OW): DRAFT BASIC ASSESSMENT REPORT FOR THE NATIONAL ROAD 3 (N3): PROPOSED CAPACITY UPGRADES: EB CLOETE INTERCHANGE TO PARADISE VALLEY (INCLUDING N2 SOLOMON MAHLANGU INTERCHANGE AND SECTIONS OF THE N2 NORTH AND SOUTH OF EB**

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Comments/Site Observations : The comments provided cover only those portions of the Basic Assessment Report dealing with the N3 freeway affecting Paradise Valley Nature Reserve. Specifically section 8. 1 – 8.6 : “Description of environmental issues, potential impacts and suggested mitigations”

Extensive interactions and site meetings have been held with SANRAL, the appointed EAP's, consulting engineers and the contractor in which various concerns were raised and which are reflected in section 8.

1) Construction of temporary access rd at PVNR using the historic access route from Entabeni Rd. This includes the proposed site camp and use of the old staff quarters and will require more detailed information regarding the impact on the Yellow Wood trees (*Podocarpus longifolio* and *Melittia grandis*) lining the route as well as the provision of temporary structures, hygiene and sanitation and provision of electricity and water. There are however concerns related to the extremely steep slopes between the temporary road and the waterfall and the protection of these slopes has not been dealt with in sect 8.

2) Impacts on Umbilo water works. This has been noted together with the assurance that the area will be fenced / screened off to prevent damage but the protection of the spillway area has not been mentioned.

3) Impact on visitors and access to reserve by staff. The training and provision of access for reserve staff has been dealt with but the loss of 90% of the reserve to visitors South of the N3 viaduct, including the waterfall area for a two year period has not been adequately addressed. During site meetings it was suggested by the SANRAL representatives that construction could be

phased so as to permit visitors to use the trails on one side of the valley only and then switching to the other side of the valley at the half way point in construction. It was also mentioned that assistance could be provided to stabilise the trails on the Northern slope and repair the old causeway at the site of the original dam wall. There is no mention of this in sec 8

4) The impact on flood levels and the potential erosion of the river banks and trails within the area affected by the viaduct widening were discussed at length but the proposed mitigations are not reflected in sect 8.

5) The impacts of the increased water run-off from the freeway and viaduct which will be discharged into the reserve from the existing culverts has not been dealt with in the BAR.

6) It was raised at the site meetings that a permanent reduction of light and water under the bridge spans will result from the widening and closure of the centre median and will result in the permanent loss of the existing forest habitat. The rehabilitation and replacement with a different habitat has not been dealt with in sect 8. If this is not done then the result will be a significant area which is permanently denuded of vegetation.

7) The general impact on vegetation in construction area and along the access road has been dealt with but no mention is made of the impact on specific protected tree species (*Podocarpus longifolio* and *Melittia grandis*) within the affected area.

8) The affect of the fence removal on land invasion, vagrancy, poaching and home invasions etc has been noted. The proposed erecting of a temporary fence during construction and a permanent fence post construction is also noted but during the time period of the contract the reserve Field Rangers will not be able to patrol this fence line properly to monitor illegal access.

9) The proposal to erect artificial nest poles as a long term nesting site for the crowned eagles is noted and supported. The protection of other mammals, reptiles and plant species within the reserve from the construction staff has not been dealt with. It must be emphasised that these staff will have 24 hour access and there is a high risk of poaching and illegal plant harvesting.

Conclusion : Although a sound working relationship has been established with SANRAL and most of the environmental concerns affecting Paradise Valley Nature Reserve have been addressed there are still items of concern as raised in points (1) – (9).

#### Department's Decision :

The Parks, Leisure and Cemeteries department requires that the issues and concerns related to points (1) – (9) are addressed before any final comment can be provided. Specifically as regards points;

1) The protection of the steep slopes and vegetation between the temporary access road and the waterfall.

2) The protection of the lower end of the waterworks spillway must be addressed.

3) That either the access to the southern portion of the reserve and waterfall by visitors is provided or that financial compensation and off set is done.

4) The realignment and stabilisation of the trails adjacent to the river needs to be addressed.

- 5) The increased water runoff from the existing culverts has to be addressed with the provision of energy dissipaters and litter traps.
- 6) The issue of the permanent change in the hydric and photolytic environment with the permanent loss of forest and post development rehabilitation has not been addressed.
- 7) The concerns regarding the protected tree species (*Podocarpus longifolio* and *Melittia grandis*) need to be addressed.
- 8) SANRAL will need to provide security guards to prevent illegal entrance to the reserve from the M13 and N3.
- 9) SANRAL must implement measures to prevent poaching and illegal plant harvesting within the reserve and adjacent road reserve for the duration of the project.

Yours faithfully

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**S WHITAKER**

**ACTING DEPUTY HEAD : PARKS, LEISURE AND CEMETERIES**