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Association incorporated under Section 21

Registration number: 2006/006370/08

NPO registration number: 052428

PBO exemption number: 930027679

Dedicated to environmental health of the uMsunduzi and uMngeni Rivers

EnviroPro

1A Leinster Pl,
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josette@enviropro.co.za

13 November 2016

Attention:

Re: EXTENSION OF BOMBAY ROAD

Dear Josette

Thank you for including DUCT on your IAP list.

Please in future always add us on your IAP list for any future proposed developments you deal with that are in the uMngeni/uMsunduzi River catchment

Your dBAR refers.

The document is comprehensive and the information well presented. We have reviewed the document and offer herewith our comments on issues of concern to DUCT. We request that these comments be **added as an appendix to the Final Basic Assessment Report to be handed in to DEDTEA**, and request that you supply us with a copy of the Comment/Response report.

Our interest lies in the fact that this proposed road extension is situated in part of the uMsunduzi River catchment, and cognizance of this fact should be taken at all times. Thus, in reviewing your document, the following concerns have influenced DUCT to comment:

- Effects / impacts on local Hydrology
 - Impacts on water supply of the river / stream / watercourse (run off, absorption)
 - Impacts on riparian zone
 - Impacts on water quality
 - Possible lowering of catchment absorption function
 - Impact on aquifer
- Cumulative effect on the uMsunduzi of developments in the vicinity

Although, in light of the present condition of the area, the potential impacts on biodiversity are considered to be negligible there is still need for care to be taken during the construction and post construction phases. The following actions are recommended:

- 1 The final BAR for this proposed road extension must be reviewed by DUCT before it is submitted to the KZN Department of Economic Development, Tourism & Environmental Affairs (DEDTEA)
- 2 Rights and duties of registered interested & affected parties should be made clear to them by the proponent/EAP. Meaning that they will be kept informed of the processes of the development going forward.
- 3 Approved plans & policies (such as the integrated Development Plan (IDP), Strategic Environmental Assessment (SEA), & Ecosystem Services Plan (ESP) for the Municipality must be factored into the DBAR
- 4 DUCT urges that proper design & construction are carefully undertaken so that there be no long term impacts on the surrounding environment most especially the nearby water resource & wetland. Thus ensuring that the social benefits may be achieved without the need for further environmental impacts.
- 5 The working area must be set out in such a way that the amount of activity near environmentally sensitive areas is reduced as far as possible
- 6 Any areas which are subject to excavation must have their topsoil stripped and stockpiled
- 7 Concrete batching is to be done off-site. Where cement is mixed on site it must be done on an impervious surface and be done well away from nearby water resources.
- 8 At the cessation of construction, the site must be cleaned and all foreign materials are to be removed
- 9 The stockpiled topsoil is to be used to rehabilitate any bare areas and original ground profiles must be maintained as far as is possible.
- 10 Areas left bare are to be re-vegetated with indigenous grass and it is strongly recommended that the grass mix contain at least one species of creeping grass

DUCT is extremely concerned as to the cumulative effect of development on this river / water course (Baynespruit). The ecological functions of the water course have already been compromised by a number of developments up stream, and the proposed development will only exacerbate this impact. In order to mitigate these cumulative effects, the development should be flood negative

Impermeable paved surfaces can potentially increase runoff. DUCT requests that permeable / absorbent surfaces as opposed to hardened road surfaces be planned in order to minimise runoff and encourage absorption of rainwater infiltration into the ground. This will minimise peak flows of storm water and also prevent runoff of pollutants from motor vehicle traffic such as car oils, petrol and heavy metals

If the applicant is granted a favourable ROD/Authorisation, issued with outstanding documents, DUCT requests to be supplied with copies of these documents when they become available in order that we may, if necessary, submit comment.

Thank you for the opportunity to comment and we look forward to receiving further information. Please address any correspondence to the Campsdrift address above

Yours sincerely

Mr SG Vilakazi

SG Vilakazi

Duzi-Umngeni Conservation Trust (Pollution Control)