



water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

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ATTENTION: MR JOHAN BODENSTEIN

Dear Sir

RE: DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED TIMBERLAND RESIDENTIAL ESTATE DEVELOPMENT

Reference is made to the above-mentioned report received by this Office.

This Department has the following comments with regard to the proposed development:

(1) WATER USE AUTHORISATION/WETLANDS AND WATER COURSES

- (1.1) It is noted from the above-mentioned report that there will be road construction within the wetland.
- (1.2) Please note that the above-mentioned-activity triggers Section 21 (c) and (i) of the National Water Act, 1998 (Act No. 36 of 1998) (NWA) (i.e. 'impeding or diverting the flow of water in a watercourse' and 'altering the bed, banks, course or characteristics of a watercourse respectively). This must be authorised prior to construction.
- (1.3) It is the responsibility of the Applicant to identify all water uses arising from the proposed project and to submit a complete Water Use Licence Application (WULA) to this Department for water uses as per Section 21 of the NWA, 1998.
- (1.4) This Department advises the Applicant to contact Ms Zamashenge Hadebe on 031 336 2700/2767 to set up a Pre-Water Use Authorisation Application meeting to determine the type of authorisation required, as well as the technical requirements and administrative process that need to be followed.

(2) SOLID WASTE MANAGEMENT

- (2.1) Contaminated materials are to be disposed of at a licenced/permited hazardous landfill site.
- (2.2) All waste generated from the proposed project must be disposed of in a suitable manner so as not to cause any water pollution or health hazard.
- (2.3) The recycling of suitable material (i.e. glass, paper, plastic, etc.) is encouraged by this Department.

(3) STORMWATER MANAGEMENT

- (3.1) The content and recommendations made in the Stormwater Management Plan for the proposed development, dated July 2016, prepared by UWP Consulting (Pty) Ltd, are noted. However, it must be ensure that:
 - Clean water (e.g. rainwater) is kept clean and routed to a natural watercourse by a system separate from the dirty water system, and the Applicant must ensure that clean water is prevented from running or spilling into dirty water systems;
 - Dirty water is collected and contained in a system separate from the clean water system, and the Applicant must ensure that dirty water is prevented from spilling or seeping into clean water systems; and
 - Drainage is controlled to ensure that runoff from the project area will not culminate in off-site pollution or result in damage to properties downstream of any stormwater discharge.

(4) SEWAGE AND WASTEWATER MANAGEMENT

- (4.1) It is noted from the BID attached to the submitted report that sewerage will be by gravity to the Umhlali Wastewater Treatment Works (WWTW). However, it must be ensured that the Wastewater Treatment Works is capable of handling the additional volume and load of sewage generated from the proposed development.
- (4.2) The capacity of the Wastewater Treatment Works to accommodate the increased volume from the proposed development must be confirmed in writing and submitted to this Department.
- (4.2) The proposed development should not commence until suitable sewage disposal system has been finalised.
- (4.3) Chemical/temporal toilet facilities must be provided during the construction phase; and their use must not cause any pollution to any water resource as well as pose a health hazard. In addition, these toilets must be situated out of the 1:100 year floodline of any watercourse.
- (4.4) It is this Department's experience that projects of this nature may result in the generation of small volumes of water containing waste. In this instance, the following is applicable:
 - Water containing waste must not be discharged into the natural environment.
 - Measures to contain the water containing waste and safe disposal of it must be implemented.

(5) EROSION CONTROL

- (5.1) Soil erosion prevention measures must be implemented to minimise soil erosion during the construction phase.
- (5.2) Erosion control measures to be implemented in areas prone to erosion such as near water supply points, edges of slopes, etc. These measures could include the use of sand bags, hessian sheets, retention or replacement of vegetation.

(6) GENERAL

- (6.1) The content and recommendations made in the Freshwater Habitat Impact Assessment Report for the proposed development, dated 30 November 2016, prepared by Ryan Edwards, are noted.
- (6.2) This Department notes the content and recommendations made in the Preliminary Hydrological Investigation for Westfeld Estate Developments, dated 18 November 2016, prepared by GCS Water and Environmental Consultants.
- (6.3) This Department also notes the content (i.e. responsibilities and conditions) as outlined in the Draft Environmental Management Programme (EMPr) for the above-mentioned project, dated January 2017. Compliance to the approved EMPr must be audited regularly by the designated Environmental Control Officer (ECO).
- (6.4) Adequate measures must be put in place to protect all water resources that flow adjacent to, as well as through, the proposed project area from being polluted and/or degraded. Visible markings showing/demarcating the buffers must be provided on site during the construction phase. If pollution of any surface or groundwater occurs, it must be immediately reported to this Department and the appropriate mitigation measures must be employed.
- (6.5) No form of secondary pollution should arise from the disposal of sewage and refuse. Any pollution problem arising from the above-mentioned development is to be addressed immediately by the Applicant.
- (6.6) Storage of material, chemicals, fuels, etc. must not pose a risk to the surrounding environment and this includes surface and groundwater. Such storage areas must be located outside the 1:100 year floodline of any watercourse and must be fenced to prevent unauthorised access into the area. Temporary bunds must also be constructed around chemical or fuel storage areas to contain possible spillages.
- (6.7) Ecological sensitive areas and their appropriate buffers must be protected and should not be degraded by the activities arising from the proposed development.
- (6.8) A Spill Contingency or Emergency Response Plan must be drawn up and should include the following actions that need to be taken into account in the event of a spill:
- Stop the source of the spill;
 - Contain the spill;
 - All significant spills must be reported to this Department and other relevant authorities;
 - Remove the spilled product for treatment or authorised disposal;
 - Determine if there is any soil, groundwater or other environmental impact;
 - If necessary, remedial action must be taken in consultation with this Department; and

- Incident must be documented.

(6.9) Notwithstanding the above, the responsibility rests with the Applicant to identify any source or potential sources of pollution from his undertaking and to take appropriate measures to prevent any pollution of the environment. Failure to comply with the requirements of the National Water Act, 1998 (Act No. 36 of 1998) could lead to legal action being instituted against the Applicant.

Please do not hesitate to contact this Office should you have any concerns, comments or queries.

Yours faithfully,



for ACTING CEO: PONGOLA-UMZIMKULU PROTO CMA

NM/nm/14309

Date: 19/04/2017