



Development Planning, Environment & Management Unit

Development Planning Dept, Land Use Management Branch

ARCUS GIBB (Pty) Ltd

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Our Ref.: (21/11) DPM/EIA 417B(N)
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25 July 2011



Arcus Gibbs
P.O. Box 1365
Westville
3630

Attention: Russell Stow

Dear Sir/Madam,

RE: DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED DUBE TRADEPORT TRADE ZONE TO WATSON HIGHWAY LINK ROAD.

With reference to the abovementioned Draft Environmental Impact Assessment Report, 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 Electricity Department has no objection, however please note:

- (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 development.
- (2) The relocation of MV/LV electrical services, if required in order to accommodate the development, will be carried out at the expense of the applicant.

2. Environmental Planning and Climate Protection Department.

This Department's comments on the Scoping report have reference.

This Department does not support the notion of functional area offsets. The historical land use (sugar cane farming) is the prime reason for the current diminished functionality. Thus, using theoretical functionality areas as the basis of an offset calculation rewards environmentally degrading historical land uses. Section 28 of NEMA states that a land owner who has caused degradation to the environment must take reasonable steps to cease and remedy the effects of the said degradation. Using functional area offsets, based on the current state of the wetlands (the result of direct draining and farming practices by the current landowner) goes against this requirement and cannot be considered as being sustainable.

This Department therefore requires that a 1:3 offset ratio is implemented and that this ratio is based on the actual wetland area which is being lost (1.79ha). This would equate to 5.37ha of wetland area, far larger an area than the 1.4ha put forward by the EAP. The rehabilitation report would need to be amended in order to reflect this change.

Offsets must look to reinstate non functional wetlands rather than enhance 'the most functional of the systems'.

Agreement needs to be reached between Tongaat Hullett Developments and DTP/ACSA regarding a catchment wide rehabilitation plan to offset the cumulative effects of the planned development in the area (as described in the Wetland Impact assessment, pg 50, point 4). This should form part of the offset/mitigation off all of the proposed projects (Ushukela, Airport Expansion, Watson Highway link etc.).

3. Framework Planning Branch.

The proposed Dube Tradeport (DTP) proposes to construct a new 3,5km long road to link the Dube Tradeport Zone to the Watson Highway (recently renamed uShukela Drive). The proposed project is intended to allow for northern access to the DTP Trade Zone via a road adjacent to the paved access road to the Herrwood Estate (610133 Street) off the Watson Highway.

The proposed link road will also serve as an arterial road for the development planned for the surrounding land and will accommodate two lanes of traffic in both directions, with a road reserve approximately 54m wide.

The Framework Planning Branch has assessed the proposal and raises no objections.

4. Land Use Management Branch.

Please be advised that this Department has no objection to the EIA in regards the above. All issues as raised in the BID document have been addressed.

5. Geotechnical Engineering Branch.

No further geotechnical comments.

6. eThekweni Transport Authority.

In terms of the KSIA/DTP development an external TIA was prepared circa 2006. The Trade Zone/Watson Highway Link was evaluated as part of the 2060 scenario. With this link being a requirement sooner than anticipated, the external TIA needs to be reevaluated, giving due consideration to the "as built" road network supporting the development.

Dube TradePort (DTP) has appointed TECHSO to prepare a New Traffic Impact Assessment for the Dube Tradeport / King Shaka International Airport/Dube City Precinct. This report is expected to be finalised and approved by end October 2011.

The TIA in support of the proposed access from Ushukela Highway (Watson Highway) to the Dube Tradeport and Ushukela Business Park, as contained in the Draft Environmental Impact Report can therefore be described as being premature as it does not relate to the New Traffic Impact Assessment for the Dube Tradeport / King Shaka International Airport/Dube City Precinct.

7. Coastal, Stormwater and Catchment Management Department.

This Department has had a look at the report and has no objections.

Should you seek clarification on any of the above issues, please contact the writer on telephone: 031 - 3117136 or via e-mail: vanrensburd@durban.gov.za In addition, the Department requests that a copy of the Record of Decision be faxed to 031 - 3117279.

Yours faithfully



DEPUTY HEAD: DEVELOPMENT PLANNING

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