



Royal Haskoning DHV
SSI House
6 Payne Road
PINETOWN
3610

Your reference: Compensation Flats

Our reference: 10804

Date: 15th January 2013

ATTENTION: MR KUSHELA NAIDOO

By Email: kushela.naidoo@rhdhv.com

Dear Mr. Naidoo

PROPOSED COMPENSATION FLATS INDUSTRIAL BUSINESS ESTATE: RESPONSE TO DAEA'S COMMENTS ON THE WETLAND SPECIALIST STUDIES

Section 8 of DAEA's rejection of the Final Environmental Impact Assessment Report dated 1st of June 2012 has reference.

This letter serves a dual purpose, firstly; provide an overview of the various wetland assessments undertaken for the project and secondly, respond directly to comments made by the DAEA.

The summary of the completed wetland assessments (**Section 1**) not only provides important background information but also for allows easier and more concise responses to DAEA's comments (**Section 2**).

Section 1: Overview of Completed Wetland Assessment for Compensation Flats

A total of 3 wetland specialist studies have been completed for Compensation Flats:

- **A Wetland Delineation and Management Report (completed in 2006);**
- **A Wetland Impact Assessment (completed in 2011); and**
- **A Wetland Rehabilitation and Management Plan (completed in 2012)**

These documents are assessed in more detail below:

1.1 Wetland Delineation Report

This report was produced by **Greg Mullins** in **2006**. The focus of the report was the undertaking of a wetland delineation of the property and outlining the predicted impacts that may be imparted as a result of the proposed development.

These impacts assessed *inter alia* roads, top structures, services, storm water and erosion on said wetlands. No concerns have been raised with the findings of this delineation assessment. This assessment fed into the Environmental Scoping Report produced by **SSI in 2010**.

1.2 Wetland Impact Assessment

The Scoping Report produced by SSI (2010) identified 3 potential impacts on the Compensation wetlands and included wetland destruction and disturbance, negative impacts associated with road construction / infrastructure and contamination of wetland areas / surface water resources for both the construction and operational phases. These impacts were already outlined in the **Delineation Report (2006)** and were to be comprehensively addressed in the **Wetland Impact Report (2011)**.

The **Scoping Report (SSI, 2010)** also included a plan of study for this Wetland Impact Report:

8.2.5.9 *Wetland Assessment and Rehabilitation Plan*

The specialist will identify and delineate all wetland areas falling within the project site and assess the potential impacts that may arise from development activities and associated infrastructure. The assessment of the health status of the wetlands will also be included.

These Terms of Reference were duly met in the aforementioned **Wetland Impact Report (2011)**.

During the Scoping Phase (**April 2010**) WESSA sent generic comments regarding wetlands and drainage lines:

2. Wetlands and Drainage Lines -The protection of these sensitive areas must be considered from several aspects, namely -

- An aesthetic aspect in a rural area under urbanisation pressure,
- A functional aspect with regards these features being the receiving environment for development related impacts. In this regard we support the minimum 30m buffer around wetlands as required by Ezemvelo KwaZulu-Natal Wildlife (KZNW) to protect the ecological integrity of wetlands.
- A social aspect with regards a 'sense of place' which is currently enjoyed in the area,
- An ecological aspect. Linked Conservation Areas must be investigated. Floodlines-These need to be shown and a buffer allocated.

▪ Erosion Control

- Soil erosion on site must be prevented at all times, especialis in areas sensitive to erosion such as near water supply points; therefore use of sand bags is recommended use of sand bags etc.

▪ Riparian area/habitat, wetlands and watercourse

- All wetlands/riparian areas must be delineated according to the department's guidelines.
- The buffer must be delineated from the outer edge of the temporary wet zone of the wetland to the edge of the structural development. No development should occur within wetland and their delineated buffer.
- Information regarding the 1:100 year floodlines must be clearly demarcated on a map. No development should occur within the 1:100 year floodline.
- Adequate measures must be put in place to protect the water resources that run through the said property from being polluted or degraded.

▪ The department also requires comprehensive layout plan showing the following:

- The position of the development in relation to the wetlands and other water sources in vicinity of the suite with floodlines should be clearly demarcated.
- The various hydromorphic zones and their associated buffer

A number of these comments fall outside the responsibility of the wetland specialist (e.g. flood lines, layout plan). We are of the opinion the pertinent comments / concerns were adequately addressed in the completed assessments.

1.3 Wetland Rehabilitation and Management Plan

The Wetland Rehabilitation and Management Plan was completed in 2012 and included:

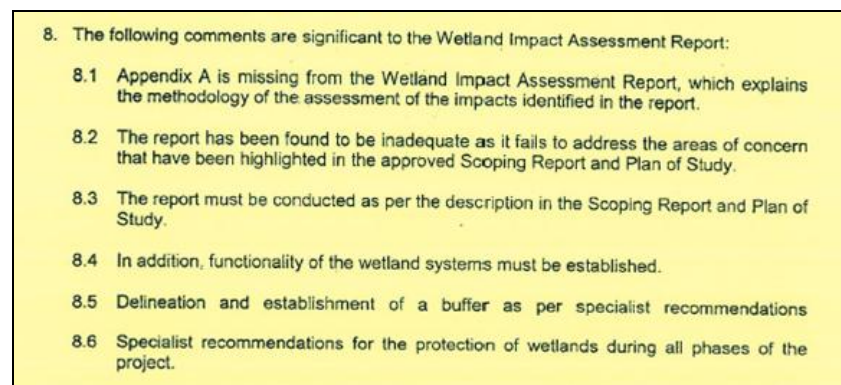
- Details for structures proposed to be established within the drainage lines to prevent further erosion and improve flooding i.e. returning the hydrological function to the wetlands;
- Methods for the removal and control of alien invasive plant species within the wetland;
- Suitable plant species to be replanted in the wetland; and
- Various monitoring steps to assess the success of the rehabilitation.

No comments with regards to this plan could be found.

Section 2: Response to DAEA Rejection Comments

2.1 Rejection Comments

In term of rejection the following reasons were given:



2.2 Response to Rejection Comments

A response to each of the six (6) comments on the Wetland Assessment Report is as follows:

Point 8.1

Appendix A: Impact Methodology was accidentally omitted by SiVEST when the Wetland Impact Assessment Report was submitted to RHDHV. This document was sent as to RHDHV by Mr Ryan Edwards on the 31st of October 2012. By sending this document we can only assume this concern has been addressed.

Point 8.2

The Final Scoping Report (**SSI, 2010**) clearly outlines the areas of concern (anticipated impacts) as well as the plan of study:

- Wetland Destruction and Disturbance
- Negative impacts associated with roads construction / infrastructure and
- Contamination of wetland areas / surface water resources.

These impacts were already outlined in the **Delineation Report (2006)** and were to be comprehensively addressed in the **Wetland Impact Report (2011)**.

The plan of study is summarised below as per the **SSI scoping report (2010)**:

8.2.5.9 Wetland Assessment and Rehabilitation Plan

The specialist will identify and delineate all wetland areas falling within the project site and assess the potential impacts that may arise from development activities and associated infrastructure. The assessment of the health status of the wetlands will also be included.

We are of the opinion that the accepted plan of study and associated objectives were adequately addressed in the **Delineation Report, Impact Report and Rehabilitation and Management Plan**. A brief description of the wetland's health status was included on Page 17 of the **Delineation Report** and in more detail in the **Wetland Impact Report**.

Point 8.3

Again we are of the opinion that the submitted reports and maps fulfil the plan of study requirements.

Point 8.4

The need for a functionality assessment, as per **Kotze et al (2009)**, is only insisted upon in the rejection comments and did not form part of the accepted plan of study. With regards to the need for such an assessment at this stage, it is probably unnecessary as the wetland impact assessment and rehabilitation plan has been completed. If the rehabilitation plan is initiated the functionality and value of the wetland systems will greatly improve. Therefore undertaking a functionality assessment on a sugar cane dominated, extremely low functioning system will not provide any significant advantage or additional information.

Point 8.5

A Wetland Delineation and Management Report was completed for the project in October 2006.

Point 8.6

Specialist recommendations were provided in **Section 2 and 3** of the **Wetland Impact Assessment (2012)**.

Section 3: Conclusion

In conclusion we would submit that undertaking any additional studies will not provide any weight to the decision making process. Three reports which address, in significant detail, the various components of wetland systems and the impacts that will likely accrue from development have been suitably mitigated in the rehabilitation plan.

Should you have any queries please do not hesitate to contact the undersigned at telephone 033 3471600.

Yours faithfully



Mr. Kurt Barichiev (Pr. Sci. Nat.)

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