



KWAZULU-NATAL PROVINCE
AGRICULTURE AND RURAL DEVELOPMENT
REPUBLIC OF SOUTH AFRICA

KZN Department of Agriculture & Rural Development
Private Bag X9059, Pietermaritzburg, 3200
Enquiries: Thabede Bongile (Prof. Natural Scientist)
Email: bongile.thabede@kzndard.gov.za
Tel : 033 355 9347
Refno: 2021/08/5035
Date: 05 November 2021

SKR Consulting
031-2791224

Attention: Siphelele Mkhize

Email: smkhize@srk.co.za

Draft Basic Assessment Report: PROPOSED HLOMENDLINI SPORTS FIELD DEVELOPMENT IN MANDENI, MANDENI LOCAL MUNICIPALITY.

1. GENERAL

- 1.1. The Provincial Department of Agriculture and Rural Development: Agricultural Resource Management, Land Use Regulatory Unit acknowledges the receipt of the above mentioned application.
- 1.2. The main objective of the application is to request Provincial Department of Agriculture and Rural Development to provide comments and inputs on the proposed development of a multi-disciplinary sports field in Hlomendlini, Mandeni.

2. BACKGROUND

- 2.1. Mandeni Local Municipality is proposing to develop a multi-disciplinary sports field in Hlomendlini in Mandeni.
- 2.2. The proposed site is situated in a residential area south-west of Padianager and Tugela within Mandeni Local Municipality over a property described as ERF 1118 of the Farm Padianager
- 2.3. The project is bounded by the secondary road, Platinum Road to the east, west and south, and Newark Primary School to the North. There are also several informal businesses that are surrounding the site. The Hlomendlini Clinic is approximately 440m to the North of the project.
- 2.4. The proposed development includes the removal of an existing, partially constructed building and construction of the Hlomendlini Sports-field.
- 2.5. The sporting facility is set to include the following
 - A soccer field
 - Open stands
 - Ablutions change rooms (male and female toilets, a kitchen, a storeroom, a change room including showers, electricity to the ablutions).
 - Conservancy tank with 110mm diameter sewer line from the ablution facilities to the conservancy tank.
 - Waterline linking into an existing water meter located offsite;
 - A combi court and
 - The entire site will be enclosed with a clear/ beta fence with one pedestrian gate and associated guard house, and one service gate entrance and exit.
- 2.6. The site covers an area of approximate 3.4 hectares
- 2.7. There is a channelled Valley Bottom Wetland that is located in the western side of site, occurring less than 10 m from the proposed project.

- 2.8. The development of a project will involve clearing of field and topsoil will be removed then stockpiled onsite. Bulk earthworks will be done over the soccer field to produce a generally flat surface with a 0.7% slope in a northerly direction across the property.
- 2.9. The proposed Hlomendlini Sports Field Development will trigger the following activities in terms of NEMA EIA Regulations
- **Activity 19 of Listing Notice 1 (GN 327)** _ "The infilling or depositing of any material of more than 10m³ into, or dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse"
 - **Activity 14 of Listing Notice 3 (GN 324)** _ "The development of infrastructure or structures with a physical footprint of 10m² or more where such development occurs;
 - a) Within a watercourse X. Outside urban areas and
 - aa) areas within 5km from any terrestrial protected area identified in terms of National Environmental Management Protected Areas Act, 2003 (Act No 57 of 2003) (NEMPA)
- 2.10. Additionally, a WUL application will also be required for submission to the Department of Water and Sanitation (DSW).
- Section 21 c) impeding or diverting a flow of a water in a watercourse and Section 21 i): Altering the bed, bank, characteristics of a watercourse. It is applicable as the development of a sports field and associated infrastructure within a portion of a wetland and within 500m of wetland.
 - Section 21 g) Disposing of waste in a manner which may detrimentally impact on a water resource. Installation of a conservancy tank for use during the operational phase.
- 2.11. The stormwater diversion is in place as to prevent major erosion taking place especially over newly constructed bulk earthworks platform, as well as the drainage around the soccer field.

3. COMMENTS

- 3.1. The proposed project will not impact any agricultural lands however there are natural resources that are going to be impacted by the proposed development.
- 3.2. The site where development is proposed is partly vacant with a partially constructed building.
- 3.3. As per attached map depicting the wetland habitat loss associated with the proposed main soccer field only a small portion of habitat will be lost mainly over an area classed as Valley Head Seep Wetland.
- 3.4. The office is happy that ablution facilities and combi courts will be allocated far away from any available freshwater features (Channelled valley bottom wetland, Valley Head Seep Wetland and Drainage Feature).
- 3.5. The attached hydrological assessment report
- 3.5.1. Concluded that the proposed sport field development poses a moderate risk to the integrity of the wetlands within the study area.
 - 3.5.2. was able to recommend a wetland offset option and rehabilitation measures through re-introduction of indigenous vegetation, implementation of erosion control with wetlands and their buffer zones in order to prevent sedimentation.
- 3.6. Such conclusion from the report generally indicates that lesser risk will be posed over the environment in the area by the proposed development.
- 3.7. Generally, land use Regulatory unit is happy with the submitted report as all areas pertaining to preservation of natural resources on site were covered that is calculated and assumed through the attachment of relevant studies with relevant recommendations.
- 3.8. The implementation and Evaluation plan are now so important as to minimise the degradation of natural resources that are onsite and those at vicinity.

4. **RECOMMENDATIONS**

Please be advised that the Provincial Department of Agriculture and Rural Development: Land Use Regulatory Component recommends the proposed development of HLOMENDLINI SPORTS FIELD the support is on basis that all recommendations from specialist are observed and implemented and a special attention is posed to the wetland regarding prevention of unnecessary pollution.



FOR HEAD OF DEPARTMENT

AGRICULTURE AND RURAL DEVELOPMENT

LETTER SIGNED BY: THABEDE S. B.

DESIGNATION: Acting Scientific Manager: Land Use Regulatory Unit.

DATE: ..J.?.....&. .Y.:§.! "?.D2./

Cc Mashudu Marubini, DAFF, Fax no: 012 329 5938

S.

Siphelele Mkhize

From: Siphelele Mkhize
Sent: Monday, 29 November 2021 10:39
To: Judy Reddy
Cc: Tamaryn Hale
Subject: RE: Development Application

Hi Judy,

The site is bound by a portion of Platinum Drive which begins in Padianager (a small residential area in Mandini). A Traffic Impact Assessment (TIA) was also conducted. It was noted therein that the sportsfield will not be utilised for large matches or contests that will bring about severe traffic volumes. Moreover, the area surrounding the proposed development is predominantly residential in nature and is classified as a low vehicle ownership area; the majority of the community members who are most likely to utilise the facility will either walk to the development or travel by public transport.

Let me know if you any further info.

Thanks,
Siphelele Mkhize

From: Judy Reddy <Judy.Reddy@Kzntransport.gov.za>
Sent: Monday, 29 November 2021 09:44
To: Siphelele Mkhize <SMkhize@srk.co.za>
Subject: RE: Development Application

EXTERNAL

Hi morning. Do you know which roads are affected, thanks

From: Siphelele Mkhize <SMkhize@srk.co.za>
Sent: 26 November 2021 15:05
To: Judy Reddy <Judy.Reddy@Kzntransport.gov.za>
Cc: Tamaryn Hale <THale@srk.co.za>
Subject: Development Application

Good day Judy,

Please find attached locality map and layout plan. Let me know if you require any further information to assist in providing your input.

Thanks,
Siphelele Mkhize

From: Judy Reddy <Judy.Reddy@Kzntransport.gov.za>
Sent: Tuesday, 23 November 2021 10:33
To: Tamaryn Hale <THale@srk.co.za>
Subject: RE: Development Application

EXTERNAL

Hi please send me a detailed to scale locality and site plan so that I can look at it and advise you, thanks

From: Tamaryn Hale <THale@srk.co.za>
Sent: 23 November 2021 10:21
To: Judy Reddy <Judy.Reddy@Kzntransport.gov.za>
Subject: RE: Development Application

Hi July,

Thank you for the clarification.

We have a project in the Mandeni Local Municipality. The project involves constructing a sports field with some associated infrastructure. Access to the proposed site is via a road under the management of the Municipality. The access road is, however, off a District road. Would DOT still be required to provide comment thereon?

See attached letter for more information.

Kind regards,
Tamaryn Hale

From: Judy Reddy <Judy.Reddy@Kzntransport.gov.za>
Sent: Tuesday, 23 November 2021 08:22
To: Tamaryn Hale <THale@srk.co.za>
Subject: RE: Development Application

EXTERNAL

Morning Tamaryn, all provincial roads and district roads are managed by DOT.

From: Tamaryn Hale <THale@srk.co.za>
Sent: 23 November 2021 08:19
To: Judy Reddy <Judy.Reddy@Kzntransport.gov.za>
Subject: RE: Development Application

Hi Judy,

Please can you assist me with some clarification.
Firstly, it is my understanding that DOT has jurisdiction over all provincial roads and that district roads are managed by the local municipality. Is this understanding correct?

If my first statement is correct then I would assume that we would only need to provide the information requested for projects that proposing to use Provincial roads to gain access. Is this correct or does DOT need to approve/provide comment on other road categories too?

Kind regards,
Tamaryn Hale

From: Judy Reddy <Judy.Reddy@Kzntransport.gov.za>
Sent: Monday, 22 November 2021 14:22
To: Tamaryn Hale <THale@srk.co.za>
Subject: RE: Development Application

EXTERNAL

Hi Tamaryn yes it is required for all types of projects. Different types of applications eg developments have their own requirements, thanks

From: [Linda Sibiya](#)
To: [Siphelele Mkhize](#)
Subject: RE: Hlomendlini Sportsfield Draft Basic Assessment Report
Date: Tuesday, 08 February 2022 09:38:58

EXTERNAL

Morning Mr. Mkhize

If that is what the acknowledgment letter from Head office is indicating that the due date for final submission is 14 February 2022, then it should be correct.

Kind regards

Linda Sibiya

From: Siphelele Mkhize [mailto:SMkhize@srk.co.za]
Sent: Tuesday, 08 February 2022 09:30
To: Linda Sibiya <Linda.Sibiya@kznedtea.gov.za>
Cc: Tamaryn Hale <THale@srk.co.za>; Malcolm Moses <Malcolm.Moses@kznedtea.gov.za>
Subject: RE: Hlomendlini Sportsfield Draft Basic Assessment Report

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Good day Mr. Sibiya,

Well wishes for 2022 to you as well.

As you may recall, in your comments received on 25 November 2021 the Department stated, "Please provide a detailed rehabilitation plan, alien invasive vegetation programme". We made contact with you via email to query whether it would be acceptable to EDTEA that the rehabilitation plan and alien invasive vegetation programme form part of the conditions of the EMPr given that it may be difficult for the Mandeni Local Municipality to source additional budget to carry out the specialist work. Given the urgency of our enquiry I also contacted your colleague, Mr. Malcolm Moses, telephonically to enquire further. He advised that EDTEA would not accept this as a condition and insisted that we attached the specialist reports to the FBAR or allow the application to lapse. We explained the gravity of the matter to the Mandeni Local Municipality who were able to make arrangements for additional budget in early January 2022. The relevant specialists were commissioned and we await the final report this week.

We submitted the application to EDTEA's Environmental Services Directorate on 22 October 2021 and circulated the DBAR for public comment on the same day. We received the attached acknowledgement letter from the Department indicating that the final day of submission for the FBAR would be 14 February 2022. We intend on submitting the FBAR on 11 February 2022.

As per the attached acknowledgement letter, could you kindly confirm whether due date of 14 February 2022 for the submission of the FBAR is correct.

Kind Regards,
Siphelele Mkhize

From: Linda Sibiya <Linda.Sibiya@kznedtea.gov.za>
Sent: Friday, 04 February 2022 11:38
To: Siphelele Mkhize <SMkhize@srk.co.za>
Cc: Tamaryn Hale <THale@srk.co.za>
Subject: RE: Hlomendlini Sportsfield Draft Basic Assessment Report

EXTERNAL

Hi Mr. Mkhize

Compliments of the new year.

I am just checking when can we expect the Final BAR of the mentioned project.

Thanks

Linda Sibiya

From: Siphelele Mkhize [<mailto:SMkhize@srk.co.za>]
Sent: Wednesday, 08 December 2021 11:49
To: Linda Sibiya <Linda.Sibiya@kznedtea.gov.za>
Cc: Tamaryn Hale <THale@srk.co.za>
Subject: RE: Hlomendlini Sportsfield Draft Basic Assessment Report

Good day Mr. Sibiya,

Thank you for your comments. I have a query and may have more as we finalize the BAR. With regard to your point number 8 which states, "Please provide a detailed rehabilitation plan, alien invasive vegetation programme." As the Department is aware, this is a Government funded project and obtaining approval for additional budget for these detailed plans will take some time. As the legislated timeframes for the BA process have already commenced there is concern that the funding will not be approved in time for the specialist to undertake the required work. This would result in the timeframes lapsing and restarting the BA process. Moreover, in almost all the EIA/BA processes we have been involved with this can be included as a condition of the EA.

In light of this, would it be acceptable to the Department (EDTEA) that we amend the BAR and EMP as follows:

- BAR: The following statement will be included in the recommended conditions of the EA (Section 15 of the BAR), "Prior to commencement of construction a detailed wetland rehabilitation plan and alien invasive vegetation programme will be compiled and

submitted to EDTEA for approval.”

- EMPr: Section 5.2.16a) will be updated (see underlined text) to read as follows: “A suitably qualified specialist will compile a wetland rehabilitation plan and alien invasive vegetation programme. This plan will be implemented to eradicate as far as possible all alien floral species which are identified within wetland areas. This plan will be submitted to, and approved by the EDTEA prior to commencement of construction.”

With this approach the required funding can be applied for and the documents can be prepared whilst we await decision from the Department with regards to the Environmental Authorisation and final input into the ensure that the sporting facility is constructed for Hlomendlini community as soon as the go ahead (Environmental Authorisation).

I look forward to hearing from you.

Siphelele Mkhize

From: Linda Sibiya <Linda.Sibiya@kznedtea.gov.za>

Sent: Thursday, 25 November 2021 11:32

To: Siphelele Mkhize <SMkhize@srk.co.za>

Subject: RE: Hlomendlini Sportsfield Draft Basic Assessment Report

EXTERNAL

Hi Mr Mkhize

The draft BAR for the above mentioned project as received by the Department on 25 October 2021 has been finally reviewed. The following comments need to have been addressed upon submission of the Final BAR in this office:

1. The interpretation of Activity 27 under Executive summary of the report is wrong. Please correct this.
2. Please provide coordinates for wetlands where the infilling will take place.
3. Section 2 on the application form under listed activities please revise your explanation on the applicability of the listed activities e.g. The infilling of sand, soil rocks e.tc should be on cubic metres not in square metres.
4. The application form and the report fails to indicate how much of indigenous vegetation in terms of Activity 27 of LN 1 is expected to be removed on site to accommodate the sports facility.
5. Are there no structures such as buildings within 32 metres of a wetland which might exceed a physical footprint of 100 square metres or more?
6. Section 51.3 (b) under Waste Management in the EMPr is not enforceable. Please reword “at convenient intervals” is this is not auditable rather specify when this must happen.
7. Please avoid use of may, appropriate, should, where possible e.t.c when making a condition to a construction team as this is not enforceable and auditable.
8. Please provide a detailed rehabilitation plan, alien invasive vegetation programme.
9. Please ensure mitigation measures as proposed by the specialists are incooperated in the EMPr.
10. Please provide a detailed Method statement for infilling within a wetland.

11. Furthermore, it is emphasised that the EMPr follows the logical assessment of impacts as stated below to ensure auditable and enforceable activity/ies:

- ***Project Description → Link to listed activity → Assessment of ALL impacts (including comparative assessment of alternatives) → Mitigation Measures and Recommendations → Translation into a detailed site specific EMPr.***

Should you have any queries with regards to the above comments please do not hesitate to contact me or send an email.

Thanks

Linda Sibiya

From: Siphelele Mkhize [<mailto:SMkhize@srk.co.za>]
Sent: Wednesday, 17 November 2021 13:39
To: Linda Sibiya <Linda.Sibiya@kznedtea.gov.za>
Cc: Tamaryn Hale <THale@srk.co.za>; Malcolm Moses <Malcolm.Moses@kznedtea.gov.za>
Subject: FW: Hlomendlini Sportsfield Draft Basic Assessment Report

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Good day Mr. Sibiya,

I've just spoken to your colleague, Mr. Malcolm Moses, who indicated that you have been allocated as the case officer for the Hlomendlini Sportsfield Environmental Authorization application. I understand all previous correspondence has been forwarded to you. As noted in the emails below, the commenting period for the DBAR closes next Monday, 22 November 2021. This serves as a gentle reminder that should EDTEA wish to comment, kindly submit these by the closing date.

Kind Regards,
Siphelele Mkhize

From: Siphelele Mkhize
Sent: Friday, 12 November 2021 15:37
Cc: Tamaryn Hale <THale@srk.co.za>
Subject: FW: Hlomendlini Sportsfield Draft Basic Assessment Report

Greetings,

The email below refers. We note that Monday, 22 November 2021 is the closing date for comments on the Hlomendlini Sportsfield Draft Basic Assessment Report. Should your Department wish to comment, kindly submit these as soon as you are able.

Kind Regards,
Siphelele Mkhize

From: Siphelele Mkhize
Sent: Friday, 22 October 2021 17:03
Cc: Tamaryn Hale <THale@srk.co.za>
Subject: Hlomendlini Sportsfield Draft Basic Assessment Report

Dear Stakeholder,

Please find attached notification letter which provides details of the availability of the Draft Basic Assessment Report for the proposed Hlomendlini Sportsfield in Mandeni KwaZulu Natal.

Kind Regards,
Siphelele Mkhize *BSc. Hons.*
Environmental Scientist



SRK Consulting (South Africa) (Pty) Ltd.
Section A, 2nd Floor, Norfolk House
54 Norfolk Terrace, Off Blair Atholl Drive, Westville, 3630
PO Box 1969, Westville, 3630

Tel: +27 (0)31-279-1200; **Fax:** +27 (0)86 2302 939
Mobile: +27 (0)79 082 2685; **Direct:** +27 (0)31 279 3224
Email: smkhize@srk.co.za
www.srk.co.za

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