COMMENT AND RESPONSE REPORT

SUPPORTING THE

FINAL ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED HUDDLE TOWNSHIP DEVELOPMENT

Prepared for:

Huddle Investments (Pty) Ltd

100 Grayston Drive Sandton 2196

Submitted to:

Gauteng Department of Agriculture and Rural Development Diamond Corner Building 68 Eloff Street Johannesburg 2000

Prepared by:

Strategic Environmental Focus (Pty) Ltd

P.O. Box 74785 Lynnwood Ridge 0040 Tel. No.: (012) 349-1307 Fax No.: (012) 349-1229 E-mail: sef@sefsa.co.za



November 2014

| SUMMARY OFCOMMENTS RAISED | SUMMARY OF RESPONSES PROVIDED | SECTION OF DRAFT EIR | | | | |
|--|---|---|--|--|--|--|
| NATURAL ENVIRONMENT | | | | | | |
| | Wetland | | | | | |
| Disturbance of the feeder area to the wetland. Negative influence of township development on the wetland. Additional service infrastructure will negatively influence the wetland. Flooding of developed areas due to a loss of drainage capacity. The proposed development will contribute to the negative impacts paused by the existing developments on the wetland. Biodiversity will be lost due to degradation of the wetland | The impacts associated with the proposed development on the adjacent wetland system will be assessed within the EIR phase of the application and detailed within the Draft EIR. The main and feeder wetland areas do not extend into the development footprint area. Stormwater generated by the proposed development will be attenuated on site, within the open space areas within the proposed development. There will be no encroachment on the wetland. A 32m buffer zone was established and there will be in activities within the buffer zone. This assessment has considered the cumulative impacts of the proposed development. | F-3.1.1 F-3.1.2 F-3.1.3 | | | | |
| | Pollution | | | | | |
| Interested and Affected Parties (I&APs) are mainly concerned with anthrax buried on site as well as additional air pollution as a result of increased traffic volumes as a direct result from the proposed development. Visual and physical pollution due to the development is also a pending concern. There was no air quality study. Therefore, EIA did not look at the pollution issue in detail. | A study concluded in2006 found that no anthrax occurs on site. It is unlikely that the additional traffic will contribute significantly to air pollution; however this will be discussed in more detail in the Draft EIR. A Visual Impact Assessment will be conducted during the EIR phase to assess visual impacts and recommend mitigation measures to reduce negative impacts and enhance positive impacts. Due to the nature of the proposed development, the activities will not results in significant pollution. Hence undertaking the Air Quality Study was unnecessary. | F-3.1.2F-3.1.3 | | | | |
| | Fauna | | | | | |
| I&APs are concerned that wildlife as well as birdlife will be negatively affected due to the proposed development. Destruction of the wetland will have a negative effect on fauna in the area. | An Ecological Verification Assessment will be conducted during the EIR phase of the project and findings shall be incorporated in the Draft EIR. The development will not occur in the wetland or buffer areas which are preferred faunal habitats. | • F-3.1.5 | | | | |
| | Flora | | | | | |
| I&APs are concerned that trees will be lost or damaged due to the development and widening of the road. | The 2005 Ecological Assessment found that the majority of trees are exotic. It will therefore be better to replace trees felled with indigenous species that will add to the biodiversity value of the greater area. The proposed development will retain as many trees as is practically possible. Loss of Open Space | • F-3.1.4 | | | | |
| I&APs commented that the development will result in the | The wetland area (including associated vegetation) that performs the "green | • F-5.1.1 | | | | |

| SUMMARY OFCOMMENTS RAISED loss of the wetland and important open space area's functioning as 'green lungs" within the urban edge. • CoJ commented that the development plan be in line with | SUMMARY OF RESPONSES PROVIDED lung" function does not fall within the proposed development footprint. The proposed development will reduce the existing open space area by approximately 28.8%. | SECTION OF DRAFT EIR |
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| the CoJ Open Space Framework. There will be loss of open space "green fields" which is a scarce resource in the CoJ. | The Draft EIR will address the CoJ's Open Space Framework. The development will reduce the open space by only 28.8%. | |
| | BUILT ENVIRONMENT | |
| Pre | ssure on Service Infrastructure | |
| • The main concern with regard to service infrastructure is that these services are already under pressure, and that the township development will require additional capacity which will not be feasible. Service infrastructure listed include: water, sewage, electricity, stormwater and roads. | Details pertaining to bulk services will be provided within the Draft EIR. Proof of capacity to accommodate the proposed development must also be included within the Draft EIR. A detailed stormwater management plan will also be provided in the Draft EIR. | • A-1.3.2 |
| Site Ac | cess, Parking & Traffic Congestion | |
| The safety of parents dropping kids off at school on Club Street is a concern. Access to the proposed township development is of concern as more vehicles will use the existing road network which is already congested. Comments regarding the upgrading of the immediate road network were also raised. | A detailed Traffic Impact Assessment (TIA) is underway, which will be made available for review and consideration with the Draft EIR. The TIA will assess all impacts relating to traffic volumes, access and parking. | F-3.2.5F-5.1.3 |
| | Commercial Activities | |
| The main concern raised by I&APs is the actual need for another commercial development within the area as there are already abundant shopping complexes serving the local community. There is no need for a shopping centre in the area. The existing ones are more than enough as the residents are already overtraded. | The township developer is applying for approximately 10,000 sqm of gross lettable area for a local community orientated retail component. The Draft EIR will provide more information on the proposed layout. A market research indicated that there is a need for the nature of commercial activities brought by the development. | • A-4 |
| SOCIAL EN | VIRONMENT & GENERAL CONCERNS | |
| | Crime | |
| There will be an increase in crime over the 5 year construction period of the township due to an influx of people/workers in the area. | A successful, high quality township development will increase security in the area and tight control will be exercised during the construction phase. The Environmental Management Programme (EMP), a component of the Draft EIR, will provide mitigation measures to address all impacts. | • F-3.2.7 |

| SUMMARY OFCOMMENTS RAISED | SUMMARY OF RESPONSES PROVIDED | SECTION OF DRAFT EIR |
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| Env | ironmental Application Process | |
| The original purchase of the land for the proposed township development did not include any public consultation. The Public Participation Process is not transparent and should allow the public to be more involved. The EIR did not present the no-go alternative and the legal requirements were not stated in the report. | The land was purchased in response to a public tender announced by the City of Johannesburg during 2011. SEF will endeavour to facilitate a transparent and consultative public participation process throughout the S&EIR process. SEF and the Applicant have adhered to and exceeded the minimum requirements, set out by legislation, in order to ensure that as many people as possible have the opportunity to participate. The report contains all the information as required by the relevant legislation, including the no-go alternative and the legal requirements. | C-1 C-2 C-3 C-4 |
| | Investment Opportunity | |
| I&APs enquired about possible investment opportunities. | These enquiries were noted. | • A-4 |
| | Administrative Requests | |
| A number of requests for information were received. | • These requests were all addressed and the information was sent to the relevant parties. | |

Table 2: Detailed Comments and Responses – DRAFT SCOPING REPORT

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| | NAT | URAL ENVIRONMENT | |
| | Concerns | with regards to the Wetla | nd |
| Ms Assimacopoulos states that the wetland is being controlled by the eucalyptus trees and if these trees are felled that there would be a lack of control of the wetland. New appropriate plants will have to replace the felled trees and she is concerned about the cost of such an operation. Ms Assimacopoulos also wanted to know if the wetland could be upgraded. | Ms Alys Assimacopoulos (Resident) | 4/09/2012 by e-mail and 16/10/2012 by e-mail | The main wetland area does not form part of the proposed development. The Township Developer is not required to upgrade the wetland area as the land is under the control of the private company who has leased the remainder of the Huddle Park Golf Club land. This company is currently undertaking the rehabilitation activities within the greater golf course area. The Township Developer plans to retain a number of the eucalyptus trees as part of a central avenue in the design of the residential development, as well as many of the other existing trees. A series of internal, well treed open spaces will be included in the design. |
| They are very concerned about the plans to build on the feeder area to a wetland. | Mr Daryl Fuchs (Save Huddle Park Community Group) On behalf of: Hans Fuchs, Helena Fuchs, Michael Capela, Mandy Capela. | 17/09/2012 by e-mail | The Wetland Delineation Assessment included within the Scoping Report (Appendix 3) indicates that the Hillslope Seepage wetland that feeds the main wetland system (valley bottom with a channel wetland) is not located where the proposed Huddle township development is to be located. This feeder area is located towards the south-west of the proposed development footprint (refer to Figures 7 and 8 of the specialist report). A verification that the site in question falls outside the Wetland Delineation will be undertaken as part of the Draft EIR phase of this application process to confirm the eastern most edge of the Hillslope Seepage feeder wetland. |
| • Ms Nel strongly objects to building on the feeder area to the wetland. | Ms Michelle Nel (Resident) | 22/10/2012 by e-mail | No development will take place on the feeder wetland. |
| Ms Laserson indicated that the geology of the area (half way house granite dome) and the surrounding wetlands needs to be considered as well as the impact of the development on the surrounding land. | Ms Marian Laserson (Resident) | 22/09/2012 by e-mail | • The geology has been taken into account (Section B-1.1) in the Scoping Report. All impacts will be considered and assessed with the Draft EIR; the Draft EIR will be made available for review and comment. |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | | RESPONSE |
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| Adv. Subel is concerned about the impact on Huddle Park, as public open space, and the impact on the wetlands. | Adv. Arnold Subel (Resident) | 10/10/2012 by e-mail | • | The township development footprint has been designed to remain outside of the wetland zones (even though the wetlands have been identified as being severely degraded). It will therefore have no negative effect on the remainder of the Huddle Park development which will make a positive contribution towards improving the public open space facilities in the area. The proposed township development has also made provision for open space areas throughout the development. Open space accounts for 9.7% (approximately 5.1 hectares) of the proposed development footprint. The design includes an external public walkway and an attractive open space that will be under the control of the Property Owners Association but accessible to the general public. |
| Dr Tricoridis feels that natural water drainage needs to be considered. | Dr K Tricoridis (Resident) | 12/10/2012 by fax | • | The Wetland Delineation Assessment included within the Scoping Report (Appendix 3) indicates that the Hillslope Seepage wetland that feeds the main water a water (valley, better with a channel water) is not leaded where |
| Mr Davidon stated that this is one of the last remaining wetlands in the country. | Mr Wayne Davidon (Resident) | 16/10/2012 by fax | Draft EIR phase of this application process to confirm the eastern in of the Hillslope Seepage feeder wetland. Thus, no development will take place on the feeder or main wetlar not located where the proposed development is to be established. All stormwater generated by the proposed development will be atter site, within the open space areas proposed within the proposed development to partially attenuate storm water on the neighbor. | the proposed Huddle township development is to be located. A verification of the Wetland Delineation will be undertaken as part of the |
| Ms Francis has been a resident in Club Street since 1938 and in Wordsworth Avenue since 1957 and is appalled by the potential damage to the wetlands. | Ms Dulcie Francis (Resident) | 16/10/2012 by fax | | of the Hillslope Seepage feeder wetland. Thus, no development will take place on the not located where the proposed development All stormwater generated by the proposed de site, within the open space areas proposed within the open space areas proposed within the potential to partially attenuate storm within the considered, and subject to accourse may be considered, and subject to accourse authority, this proposal may be taken further stores. |
| Mr Maree feels that the wetland areas within the park will be under pressure from the additional sewerage infrastructure and related development. | Mr Pierre Maree | 26/10/2012 by e-mail | • | The impacts associated with the proposed development will be assessed within the EIR phase of the application and detailed within the Draft EIR. (Unrelated to the concern expressed)No sewage will flow into the wetland or affect the wetland. The sewer will connect directly into the existing Johannesburg Water outfall sewer at one point only and will be subject to the requirements and standards as laid down by the local authority. |

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| Denny drew attention to the fact that weather patterns worldwide are changing and says it is probably due to the impact of the 6 billion inhabitants and their activities. Denny stated that locally they have experienced several 50mm downpours in the last year, followed recently by a snow storm and a hail storm with stones as large as cricket balls. Denny believes that these abnormal events will increase in frequency and severity as we continue to abuse the planet an that severe and prolonged rain storms as are being experienced in Europe, America and Asia can be expected in particular. Denny is surprised that at this stage of climatic change the developers are considering replacing more than 50% of a wetland with an intensely populated development of 309 houses, a housing cluster and a shopping centre with roads and parking areas and said that in case the developers and their advisers had overlooked it, the runoff from a flash flood will be downhill, overloading the remaining wetland and the Jukskei and causing severe flooding of Alexandra and environs. Denny further states that from press reports we are made aware of the hardship suffered by squatters in Alex virtually every year under flood conditions, now we are running the risk - if this development proceeds – of flooding larger parts of the township. Denny also noted that lack of foresight and planning has caused similar flash flooding at Corlett Drive (resulting from the Melrose Arch development) and in the Japanese Gardens in Glenhazel (resulting from intense development in upper Glenhazel – south of Northfield Rd). | Denny Rademeyer (Resident) | 29/10/2012 by e-mail | The development is situated well above the 1:100 year flood levels and will not be affected by floodwater. Very generous open spaces are included in the design and these will be used to attenuate stormwater drainage. The wetland area (including associated vegetation) does not form part of the proposed township development. The development footprint is approximately 53 hectares (28.8%) of the greater 183 ha Huddle Park area. The Wetland Delineation Assessment (Appendix 3) highlights that the functional and ecological sensitive areas fall outside of the proposed development footprint and the proposed township development will have no negative effect on the wetlands. All stormwater generated by the local authority, within the open space areas within the proposed development. As stated previously an option to partially attenuate stormwater on the neighbouring golf course is being considered, and subject to agreement by the township developer, this may or may not be taken further. More details of the stormwater attenuation and management plan will be provided in the Draft EIR. |
| Ms Wijtenburg states that the unintended consequences of developing on/ near wetlands need to be brainstormed and not minimized. Irreversible damage to sustainability in the long term must be a serious concern. | Ms Marisa Wijtenburg (Resident) | 29/10/2012 by e-mail | • To reiterate, the proposed township development will not negatively impact upon the wetlands as it is located outside of the wetlands and its buffer areas. Any impacts, although highly unlikely, will be assessed within the EIR phase of the application and detailed within the Draft EIR. |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| | C | oncerns with regards to P | pllution |
| Ms Assimacopoulos is concerned about buried anthrax close to the dump on the north-eastern perimeter of the site. | Ms Alys Assimacopoulos (Resident) | 4/09/2012 by e-mail and 16/10/2012 by e-mail | A study of the potential of anthrax on the site has been undertaken and concluded that there is no anthrax potential on the site. The dumping area on the north-eastern perimeter does not form part of the proposed development. No earthworks will be taking place in close proximity to the dumping area. |
| Ms Assimacopoulos feels that more vehicles on the roads will contribute to producing higher levels of air pollution. | Ms Alys Assimacopoulos (Resident) | 4/09/2012 by e-mail and 16/10/2012 by e-mail | • The potential additional traffic is unlikely to materially affect the levels of air pollution. The impact on air pollution will then be discussed and assessed within the Draft EIR. |
| • Mr Defries is concerned about road congestion and the increase in smog and fumes. | Mr Shawn Defries (Resident) | 16/10/2012 by fax | |
| • Denny is concerned about the exposure that residents of this development will have from airborne contamination from the adjoining fever hospital graveyard and states that medical opinions should be sought in this regard. | Denny Rademeyer (Resident) | 29/10/2012 by e-mail | This comment would be applicable to the entire surrounding community and not only to "residents of this development". Hospitals are managed extremely strictly and must comply with stringent regulations and management interventions. Comment is noted, and SEF will endeavour to respond in more detail within the Draft EIR. |
| VBGD TP feels that aspects such as visual and physical pollution need to be carefully planned and assessed. | VBGD Town Planners on behalf of the SAHETI School | 26/10/2012 by e-mail | A Visual Impact Assessment will be conducted during the EIR phase of the project to assess the significance of potential visual impacts. The Township Developer has placed a high priority on the design of the proposed township and its future development. An emphasis has been placed on a visually attractive edge to the development from the public street, and on the retention of existing trees which will help soften the visual impact. |
| | Conce | rns with regards to Fauna | |
| Ms Assimacopoulos is concerned about wildlife on site. | Ms Alys Assimacopoulos (Resident) | 4/09/2012 by e-mail and 16/10/2012 by e-mail | Faunal sightings included feral cats and water birds associated with the water features within the greater golf course area. No faunal species of conservation concern were identified on site during the Ecological Assessment of May 2005. An Ecological Verification Assessment will be conducted during the EIR |
| • Mr Kretzmer would like all aspects pertaining to the environment (like birding, fishing etc.) to be considered during the S&EIR phase. | Mr Max Kretzmer (Resident) | 25/09/2012 by e-mail | phase of the project and the findings shall be incorporated and the impact on fauna assessed in the Draft EIR. The development will not occur in the wetland or buffer area which is the areas most attractive to bird life and fauna. |

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| • Adv. Subel is concerned about the impact on Huddle Park as public open space and the impact on the fauna. | Adv. Arnold Subel (Resident) | 10/10/2012 by e-mail | |
| • Dr Tricoridis indicated that the fauna of the area needs to be considered during the S&EIR process. | Dr K Tricoridis (Resident) | 12/10/2012 by fax | |
| Ms Francis is appalled by the potential damage to the bird life. | Ms Dulcie Francis (Resident) | 16/10/2012 by fax | |
| Mr Defries has concerns over the bird life, especially on Club Street. | Mr Shawn Defries (Resident) | 16/10/2012 by fax | |
| • Mrs Wolder pointed out that there are wetlands on Huddle that are home to endangered species (e.g. cranes) and that other bird life and small animals will be threatened by the development. | Mrs Wolder (previous city councillor) | 22/10/2012 by e-mail | |
| • Ms Ignatova is concerned that the wetland habitat will be destroyed thus impacting on existing wildlife. | Ms Alberta Ignatova (Resident) | 29/10/2012 by e-mail | |
| | Conce | erns with regards to Flora | |
| Ms Goldman requested that the trees within the area are retained. | Ms Alice Goldman (Resident) | 4/09/2012 by e-mail | A detailed study of the existing trees on the site has been undertaken and as many as possible of the trees are to be retained. The Ecological Assessment of May 2005 found that the site is greatly |
| • Adv. Subel is concerned about the impact on Huddle Park as public open space and the impact on the flora. | Adv. Arnold Subel (Resident) | 10/10/2012 by e-mail | transformed and dominated by exotic species with very little ecological value. It will therefore be better to replace trees felled with indigenous species within the proposed development that will increase the ecological and biodiversity |
| Dr Tricoridis indicated that the flora of the area needs to be considered during the S&EIR process. | Dr K Tricoridis (Resident) | 12/10/2012 by fax | value of the greater area. The design places great emphasis on the retention of trees and the creation of internal open spaces. Internal roads and open spaces are configured so |
| Ms Francis is appalled by the potential damage to the natural trees. | Ms Dulcie Francis (Resident) | 16/10/2012 by fax | that more trees can be preserved. |
| Mr Defries has concerns over the tree life, especially on Club Street. | Mr Shawn Defries (Resident) | 16/10/2012 by fax | |

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| • Ms Nel objects to the loss of 41 trees along Club Street that will be cut down to widen the road. | Ms Michelle Nel (Resident) | 22/10/2012 by e-mail | |
| | Concerns wit | h regards to loss of Open | Space |
| Ms Kirby is saddened that the last "green lung" and wetland is being developed. | Ms Jane Kirby | 5/09/2012 by e-mail | The wetland area (including associated vegetation) does not form part of the proposed township development. The development footprint is 53 hectares (28.8%) of the 183 ha larger green area. The remainder of the Huddle Park development which is currently being rehabilitated forms one of the largest public open spaces in Johannesburg and will continue to provide an important green lung. The Wetland Delineation Assessment (Appendix 3) highlights that the functional and ecological sensitive area providing the "green lung" function within an urban environment falls outside of the proposed township development footprint. |
| • They are concerned with the loss of open space and green lung area as well as the loss of 41 mature trees along Club Street that will be cut to widen the road. They feel that there is no need for another gated suburb at the expense of green field space. | Mr Daryl Fuchs (Save Huddle Park Community Group) On behalf of: Hans Fuchs, Helena Fuchs, Michael Capela, Mandy Capela. | 17/09/2012 by e-mail | Further to the statements made above in response to a similar concern, the Wetland Delineation Assessment (Appendix 3) highlights that the greater wetland and open space area is degraded and has been transformed – thus it is no longer a green fields site. The study further delineates the two wetland types and recommends that they are incorporated into a protected zone and rehabilitated. The revised footprint of the proposed development does not fall within the recommended |
| • Mr Yawitch indicated that the area belongs to the citizens of Joburg and it should not be used to provide money to the metro to enhance the bonuses of overpaid and incompetent managers nor to enrich private companies. | Mr Boris Yawitch (Resident) | 5/10/2012 by fax | Protection zone, thus the "green lung" area will not be negatively impacted on by the proposed development. A verification of the Wetland Delineation will be undertaken as part of the Draft EIR phase of this application process to confirm the eastern most edge of the Hillslope Seepage feeder wetland. |
| Ms Wahl is strongly opposed to any development of open spaces which will affect the environment and the environs. She feels that the community desperately need more open spaces and should not cover up the area in concrete, which will create further water problems. | Ms Dorrit Wahl (Resident) | 18/10/2012 by fax | The design places great emphasis on the retention of trees and the creation of internal open spaces. No assumption can as yet be made as to what trees may have to be removed. It should be noted that internal roads and open spaces are configured so that more trees can be preserved. The Ecological Assessment of May 2005 found that the site is greatly transformed and dominated by exotic species with very little ecological value. It will therefore |
| • Ms Economacos feels that the community needs its "green lungs". | Ms Anne Economacos (Resident) | 18/10/2012 by fax | be better to replace trees felled with indigenous species within the proposed development that will increase the ecological and biodiversity value of the greater area. |
| Ms Nel objects to the loss of open space and green lung area. She feels that there is no need for another gated suburb at the loss of green field space. | Ms Michelle Nel (Resident) | 22/10/2012 by e-mail | The proposed development footprint is 53 hectares (28.8%) of the 183 ha larger green area of Huddle Park. |

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| Mrs Wolder was the councillor from 1995 – 2005 for the ward in which Huddle Park is located and was involved in the activities to redevelop and retain Huddle Park as public open space and not to allow unnecessary development other than golf courses, walking or cycling tracks or to simply have the area remain as open space. Mrs Wolder indicates that Huddle Park is defined as public open space and wishes to know why and on what grounds the council is allowing it to become residential and commercial. Mrs Wolder also stated that the City of Joburg has no right to deprive its citizens of their public open space in favour of more concrete and more pollution and destroying mature trees thus depriving citizens of oxygen and the only green lung the area. | Mrs Wolder (previous ward councillor) | 22/10/2012 by e-mail | The proposed development has also made provision for open space areas throughout the development. Open space accounts for 9.7% of the proposed development footprint. The applicant purchased approximately 53 hectares of land at Huddle Park in response to a public tender process announced and run by the City of Joburg during 2011. |
| Ms Newstadt feels that Huddle Park is a community area and a green space for the whole Johannesburg. She feels that it is a public space and should not be developed and should not be sold off to a private corporation for profit. | Ms Wendy Newstadt (Resident) | 26/10/2012 by e-mail | |
| • Mr Maree feels that there is most likely going to be a huge environmental impact on Huddle Park which is widely regarded as our local green lung. | Mr Pierre Maree (Resident) | 26/10/2012 by e-mail | |
| | В | UILT ENVIRONMENT | |
| | Concerns with regard | ds to pressure on Service | Infrastructure |
| They expressed concern over the extra water, sewage and electricity demands that will be placed on an already over-burdened system through a development. | Mr Daryl Fuchs (Save Huddle Park Community Group) On behalf of: Hans Fuchs, Helena Fuchs, Michael Capela, Mandy Capela. | 17/09/2012 by e-mail | The consulting engineers have verified that all the required engineering services can be made available to the proposed township development. This may in certain instances require to be supplemented which will be for the cost of the township sdeveloper. As detailed within the Scoping Report (Section A-1.3) the proposed development will require: The installation of an underground 11kV electrical cable from the |
| Mr Defries expressed concern over electricity. He stated that there will be a huge burden placed on an area which is already prone to blackouts. He indicated that the water and sewerage systems are also already under pressure. | Mr Shawn Defries (Resident) | 16/10/2012 by fax | Alexandra Substation to the north. Two routes are proposed and will be assessed within the Draft EIR. The preferred route of the cable falls within the existing City Power servitude. A connection to the existing Egoli Gas pipeline is also proposed in order |

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| Ms Nel is concerned about the extra requirement for water, electricity and sewerage on an already over- burdened system. | Ms Michelle Nel (Resident) | 22/10/2012 by e-mail | to provide an alternative (green) to coal generated electricity, thus reducing the increased demand on Eskom supplies. The local municipality will confirm capacity for water and sewer |
| • Mrs Wolder believes that a potential 500 residential units will add extra pressure on the city's already over- burdened electricity supply grid. | Mrs Wolder (previous ward councillor) | 22/10/2012 by e-mail | connections to existing infrastructure – these confirmations and/or upgrades to existing infrastructure (for the developer's account) will be discussed and assessed within the Draft EIR. All stormwater generated by the proposed development will be attenuated on |
| VBGD TP stated that development of the site will increase demands on engineering services in general, which include water, sewer, electricity and storm water and that it will be necessary to show that these services can be supplied to the development, without disrupting or negatively influencing existing supply to the area, and the school. | VBGD Town Planners on behalf of the SAHETI School | 26/10/2012 by e-mail | a steriminated generated by the proposed development will be ditendated on site, within the open space areas proposed within the proposed development. More details of the stormwater attenuation and management plan will be provided in the Draft EIR. The Draft EIR will provide more details as to where construction rubble and general waste will be disposed of. The relevant disposal site will also have to provide a letter confirming capacity. |
| Mr Maree is states that the Sandringham dumping site is already under pressure and runs way beyond its current capacity. He feels that the new development will give rise to additional pressure on the dumping area. | Mr Pierre Maree (Resident) | 26/10/2012 by e-mail | |
| • Ms Ignatova is concerned that the development will destroy a historical golf course (over a hundred years old) and that the small area will become overdeveloped. She feels that there are surrounding areas available for the development and that this is unnecessary destruction. She also feels that the environmental effect will be to severe and damaging in the long run and that it can only be prevented by ending the development. | Ms Alberta Ignatova (Resident) | 29/10/2012 by e-mail | |
| | Questions and conce | rns with regards to Acces | s and Parking |
| • Rabbi Kacev is concerned about the road system on Club Street and particularly the safety of parents dropping of their kids at school. He would like to enquire about the possibility of creating a parking area on the Huddle property opposite the school's Club street entrance. | Rabbi Craig Kacev (Headmaster of the King David School) | 3/09/2012 by e-mail | The proposed Township is situated some distance from King David and the portion of Huddle Park near King David School is not under the control of Huddle Investments (Pty) Ltd, and so it will not be possible for this development to create a parking area on the Huddle Park site without agreement from the City of Joburg and / or the current lease holder. However consideration of the safety of school children forms part of the road improvement and signalisation planning undertaken by Huddle Investments (Pty) Ltd and several options regarding the King David's School safety problems are being proposed and considered in the Traffic Impact Assessment (TIA) and these will be discussed with King David School, before any decision is considered, in the near future. The funding of the |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| | | | implementation of any of these proposals will have to be sought by the school. |
| Ms du Plessis indicated that the map attached to the scoping report shows the entrance to the proposed development to be opposite Donne Avenue. She enquired if this is to be the only entrance and exit to the new development and if there is a plan to include robots at this entrance. With respect to the roads, she would like to know if the widening of Club Road will result in a double lane road in both directions. | Ms Erica du Plessis (Resident) | 19/09/2012 by e-mail | Road widening will be required for a portion of Club Street. There will also be upgrades to certain intersections in the area to improve the current traffic flow. A detailed Traffic Impact Assessment (TIA) is underway, which will be made available for review and consideration in the Draft EIR. There will be two entrances to the residential development, one from Club Street South (opposite Donne Avenue) and the other from Club Street North / Extension. These will be signalised and improve the traffic flow. In addition there will be a third direct entrance to the retail centre from Club Street South. |
| VBGD TP feels that aspects such as the positioning of access, parking and the like need to be carefully planned and assessed. | Planners on behalf of the | 26/10/2012 by e-mail | A detailed Traffic Impact Assessment (TIA) is underway, which will be made available for review and consideration in the Draft EIR. The TIA will assess all impacts relating to traffic volumes, access and parking. |
| | Concerns wit | h regards to Traffic Cong | estion |
| • Ms Assimacopoulos has major concerns over increased traffic volumes. She feels that more homes would lead to more commuters and that more vehicles on the road would cause more congestion. She also feels that roads such as Club Street (leading into Orange Grove) and Avon Road (leading into Glenhazel) cannot be widened. These roads are highly congested during peak hours due to the Sandringham, King David, Linksfield, Saheti and St Andrews Schools which are all in very close proximity. | Ms Alys Assimacopoulos (Resident) | 4/09/2012 by e-mail and 16/10/2012 by e-mail | Club Street is currently congested during peak hour traffic. The proposals being put forward by the Township Developer will improve the general traffic movement in the immediate area. According to the City of Johannesburg's Region E, RSDF, Club Street and Linksfield Road have been identified as east – west mobility roads within the CJMM. As such the maintenance and upgrade of these roads are important in maintaining the efficient connectivity of the metropolitan to the surrounding areas. The proposed development will upgrade a section of Club Street and thus is in line with the City's RSDF. A detailed Traffic Impact Assessment (TIA) is underway, which will be made available for review and consideration in the Draft EIR. The TIA will detail which road network upgrades are required and the timing thereof. |
| They are troubled about the extra traffic load that will be placed on an already over-burdened street. | Mr Daryl Fuchs (Save Huddle Park) On behalf of: Hans Fuchs, Helena Fuchs, Michael Capela, Mandy Capela. | 17/09/2012 by e-mail | A detailed Traffic Impact Assessment (TIA) is underway, which will be made available for review and consideration in the Draft EIR. The TIA will detail |
| • Dr Gubb is concerned about road traffic access and indicates that the impact on the surrounding residents should be considered especially at peak times (i.e. school entry and exit). | Dr Peter Gubb (Resident) | 18/09/2012 by fax | which road network upgrades are required and the timing thereof. |
| • Ms Laserson suggested that a proper traffic impact | Ms Marian Laserson | 22/09/2012 by e-mail | |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| assessment be conducted in the area and in the surrounding area. | (Resident) | | |
| Mr Mendelsohn indicated that traffic on Club Street needs to be considered in S&EIR phase. | Mr Bryan Mendelsohn (Resident) | 28/09/2012 by e-mail | |
| Mr Osher is concerned about traffic control. | Mr Farrel Osher (Resident) | 10/10/2012 by e-mail | |
| Dr Tricoridis is also concerned about the traffic implications i.e. congestion and danger for the school. | Dr K Tricoridis (Resident) | 12/10/2012 by fax | |
| Mr Karro is concerned about the roads and traffic. | Mr Ashley Karro (Resident) | 12/10/2012 by fax | |
| Ms Francis stated that traffic in the area is a problem. | Ms Dulcie Francis (Resident) | 16/10/2012 by fax | |
| Ms Economacos is concerned with the traffic chaos that will be caused. | Ms Anne Economacos (Resident) | 18/10/2012 by fax | |
| Ms Nel is concerned about the extra traffic on an already over-burdened street. | Ms Michelle Nel (Resident) | 22/10/2012 by e-mail | |
| Mrs Wolder also feels that the schools in the immediate area will be further compromised by the excess of, at least, another 1000 vehicles using Club Street from the planned residential component. Mrs Wolder highlighted the fact that Club Street will have to be extensively revamped to make allowances for the extra vehicles and this will exacerbate an already over-crowded Club Street which she believes will add to more road rage incidents. | Mrs Wolder (previous ward councillor) | 22/10/2012 by e-mail | A detailed Traffic Impact Assessment (TIA) is underway, which will be made available for review and consideration in the Draft EIR. The TIA will detail which road network upgrades are required and the timing thereof. |
| Mr Majid feels that traffic will be a problem. | Mr Alan Majid | 22/10/2012 by fax | |
| Mr Economacos is concerned about the traffic congestion and he would like to know what type of development is being done. | Mr MM Economacos | 25/10/2012 by e-mail | |
| Ms Newstadt feels that the already congested Club Street will become gridlocked with traffic if people go in and out of the development. | Ms Wendy Newstadt (Resident) | 26/10/2012 by e-mail | |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| • Mr Maree is concerned as he feels that road infrastructure in the area is already under pressure with through traffic from the Edenvale area and all the schools in the area i.e. King David, St Andrews and SAHETI. | Mr Pierre Maree | 26/10/2012 by e-mail | |
| VBGD TP stated that the surrounding roads are arterial routes which serve the wider area and also provide access to and from the N3 freeway to the east. They further stated that these routes are busy and congested at peak times, and consequently, it will be necessary to fully assess the impact the development will have on traffic patterns, and roads in the area, as well the direct access to the school. VBGD TP request that any Traffic Impact studies undertaken for the development be forwarded to us for evaluation. | VBGD Town Planners on behalf of the SAHETI School | 26/10/2012 by e-mail | A detailed Traffic Impact Assessment (TIA) is underway, which will be made available for review and consideration in the Draft EIR. The TIA will detail which road network upgrades are required and the timing thereof. |
| • Denny is concerned that the overloading of the existing road network in the Club/Linksfield area, these roads are already under pressure during peak periods. | Denny Rademeyer (Resident) | 29/10/2012 by e-mail | |
| • Adv. Subel feels that there will potentially be huge traffic problems and inadequate infrastructure to address these problems. | Adv. Arnold Subel (Resident) | 10/10/2012 by e-mail | |
| | Questions and concer | ns with regards to Comm | ercial Activities |
| Ms Goldman indicated that no further retail outlets are needed within a 5km radius. | Ms Alice Goldman (Resident) | 4/09/2012 by e-mail | The township application is required to motivate the need for the proposed retail development. Full details will be found in this application and all |
| • They indicated that there is no need for another mall in the area. | Mr Daryl Fuchs (Save Huddle Park Community Group) On behalf of: Hans Fuchs, Helena Fuchs, Michael Capela, Mandy Capela. | 17/09/2012 by e-mail | interested and affected parties will have the opportunity to comment on the township application. The proposed development will not include a shopping mall, but rather a 4.8ha neighbourhood type business and retail development. The applicant is applying for approximately 10,000 sqm of gross lettable area for the local community orientated retail component. It is anticipate that the development of the retail centre will be phased. The number of stores has not |
| • Ms Du Plessis indicated that the report stated that 4 hectares of the property will be for business development and she would like to know if this refers to a business park or shopping centre. | Ms Erica du Plessis (Resident) | 19/09/2012 by e-mail | yet been determined, as the design for the retail centre has not yet been undertaken. It is anticipated that the future tenants will be focused around food, service and specialty shops, serving the needs of the demographic profile of the local community. |
| Ms Laserson expressed a need for proper justification to be provided for another unnecessary shopping centre. | Ms Marian Laserson (Resident) | 22/09/2012 by e-mail | The Draft EIR will provide more information on the layout of the proposed neighbourhood. |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| Ms Francis indicated that there is no need for any additional shopping centres as the area is already well served. | Ms Dulcie Francis (Resident) | 16/10/2012 by fax | |
| Ms Nel indicated that there is definitely no need for another mall so close to Greenstone, Balfour and East Gate. | Ms Michelle Nel (Resident) | 22/10/2012 by e-mail | The township application is required to motivate the need for the proposed retail development. Full details will be found in this application and all interested and affected parties will have the opportunity to comment on the township application. The proposed development will not include a shopping mall, but rather a 4.8ha neighbourhood type business and retail development. The applicant is applying for approximately 10,000 sqm of gross lettable area for the local community orientated retail component. It is anticipate that the development of the retail centre will be phased. The number of stores has not yet been determined, as the design for the retail centre has not yet been undertaken. It is anticipated that the future tenants will be focused around food, service and specialty shops, serving the needs of the demographic profile of the local community. The Draft EIR will provide more information on the layout of the proposed neighbourhood. |
| Mrs Wolder says that there is no need or want of more commercial components on the property as the vicinity is already over-populated with commercial businesses (e.g. Greenstone shopping centre a few kilometres north, 2 Linksfield centres, and small retail shops in Sandringham). | Mrs Wolder (previous ward councillor) | 22/10/2012 by e-mail | |
| VBGD TP states that, as shown on the proposed site layout, the proposed business and higher density residential sites are located at the intersection of Linksfield and Civin/Club Ave, which is directly adjacent to the school. According to VBGD TP these components of the development have the highest potential for negative impacts on the immediate environment, as shopping centres are intensive land uses and can attract many undesirable elements depending on how they are developed, and the future tenant mix. VBGD TP states that Peripheral elements associated with shopping centres such as advertising and hoardings, lighting, telecommunications etc, need to be suitably controlled so as not to detrimentally affect the | VBGD Town Planners on behalf of the SAHETI School | 26/10/2012 by e-mail | |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| surrounding properties. | | | |
| | SOCIAL ENVIR | ONMENT & GENERAL CO | NCERNS |
| | Conce | rns with regards to Crime | |
| They feel that there will also be an increase in crime in an area that is already badly hit by home invasions and hijackings. | Mr Daryl Fuchs (Save Huddle Park Community Group) On behalf of: Hans Fuchs, Helena Fuchs, Michael Capela, Mandy Capela. | 17/09/2012 by e-mail | The proposed township development is unlikely to result in any change to the current situation as regards crime in the area. A Social Impact Assessment (SIA) will however be conducted for the development during the EIR phase of the project and the potential impacts assessed. Details of this will be provided within the Draft EIR. The aim of this SIA is to investigate and describe the social environment surrounding the proposed development, and the potential impacts of the |
| • Dr Gubb is also concerned about security during the construction phase. | Dr Peter Gubb | 18/09/2012 by fax | proposed development on the social environment. The social environment consists of all social networks and systems that are potentially impacted on |
| Adv Subel is concerned about security in the surrounding areas during the development phase. | Adv Arnold Subel | 10/10/2012 by e-mail | A successful, high quality township development will increase security in the |
| Ms Nel expressed concern over an increase in crime in an area that is already badly hit by home invasions and hijackings. | Ms Michelle Nel (Resident) | 22/10/2012 by e-mail | area and tight control will be exercised during the construction stage. The applicant desires that the development is implemented as quickly as possible. The roll out will be driven by the approvals and macro economic |
| Mr Majid feels that there will be an emergence of crime. | Mr Alan Majid | 22/10/2012 by fax | factors and conditions. |
| VBGD TP feels that security need to be carefully planned and assessed. | VBGD Town Planners on behalf of the SAHETI School | 26/10/2012 by e-mail | |
| • Mr Maree feels that if the development is going to occur over a 5 year period that it raises alarm bells with respect to potential criminal activity in the area over the five year period. | Mr Pierre Maree (Resident) | 26/10/2012 by e-mail | |
| Concerns w | ith regards to the Environm | ental Application Process | s (including Public Participation) |
| Ms Assimacopoulos feels that the original purchase has been carried out without any consultation of the public behind the backs of the surrounding neighbourhoods and wider public. This action makes her suspicious of the whole process and she feels that unless the public is consulted on everything that the project would be delayed by the public every step of the way. | Ms Alys (Resident) | 16/10/2012 by e-mail | The applicant purchased approximately 53 hectares of land at Huddle Park in response to a public tender process announced and run by the City of Joburg during 2011. |
| Ms Motshegwa requested more information on the SEF process to inform residents via a newspaper article. According to Ms Motshegwa many readers have been | Ms Lesego Motshegwa: (North Eastern Tribune – | 4/09/2012 by e-mail | SEF responded via telephone for further discussion on 7/09/2012. E-mail response on 17/09/2012: Ms Motshegwa was assured that the matter will be discussed with the client and communicated in due course. In the meantime, |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| ringing the newspaper with questions regarding the proposed development and the public participation process (PPP). | News Editor) | | Ms Motshegwa was requested to forward the details of anyone who has already enquired about the development to date and also to direct all future enquiries to SEF. |
| Mr Gubb feels that there needs to be regular, transparent communication to all stakeholders in the area (residents, schools, etc.). Ms Laserson acknowledges that the public participation process is an important part of the project; she feels however that SEF's public participation process in the previous EIA was badly conducted. She also acknowledges that the EIA technical process is a good process, however, she feels that SEF is | Dr Peter Gubb (Resident) Ms Marian Laserson (Resident) | 18/09/2012 by fax 22/09/2012 by e-mail | The township developer has from the outset made contact with the Linksfield Residents Association as well as with the Head League who represent a large proportion of the residents in the surrounding area. These two associations have been kept informed of the planning process and furthermore, the township developer has made itself available to respond to any concerns outside of the formal scoping and planning process. All registered I&APs will be notified and given opportunities to raise comment throughout the Scoping and Environmental Impact Assessment (S&EIR) process, as required by the EIA legislation. |
| considered to have done a meagre job on the 2005/2007 EIA and the same should not be repeated. Mr Kretzmer enquired as to how inclusive the public participation process is. | Mr Max Kretzmer (Resident) | 25/09/2012 by e-mail | SEF will endeavour to facilitate a transparent and consultative public participation process through the S&EIR process. The legislation clearly states the minimum requirements for the public participation process, and the developer and SEF has undertaken additional activities to ensure that as |
| Mr Bryan feels that the PPP is not transparent. | Mr Bryan Mendelsohn (Resident) | 28/09/2012 by e-mail | many people as possible have the opportunity to participate. A public meeting will be held during the review period of the Draft EIR at which the findings of all the specialist studies and the Draft EIR will be |
| Ms Nel would like to know where all the comments from the previous report are. | Ms Michelle Nel (Resident) | 22/10/2012 by e-mail | presented. All registered I&APs will be invited to attend this public meeting. Sufficient notice will be provided for the public to prepare for this meeting (this is usually two (2) weeks in advance). Advertisements will also be placed in |
| Mrs Wolder hopes that she may have the opportunity to debate and add more at a public participation meeting. | Mrs Wolder (previous ward councillor) | 22/10/2012 by e-mail | the local newspapers in order to notify all I&APs of the arrangements regarding the meeting.A new application for the proposed development was lodged with GDARD in |
| Ms Wijtenburg wants to know why the notice was not made available publicly and prominently from early September – when the process was first opened. | Ms Marisa Wijtenburg (Resident) | 29/10/2012 by e-mail | April 2012. This is therefore a new and separate process following significant changes to the proposed development layout – which largely took into account comments raised during the 2005/7 project. |
| • The poor quality of the photos and the small scale of the drawings in the report document may conceal further issues of importance and concern; these documents should have been presented in A0/ A1 size, not A4/ A5. | Denny Rademeyer (Resident) | 29/10/2012 by e-mail | The Public Participation process for the proposed development commenced on 4 September 2012 with notification of the availability of the Draft Scoping Report and an invitation to I&APs to register and comment. Please refer to Appendix 5 of the Scoping Report for more information of the various notification methods employed and proof of notifications. |
| Ms Ignatova feels that there has been no valid public participation and that there has been no information from the buyers – merely rumours. | Ms Alberta Ignatova (Resident) | 29/10/2012 by e-mail | The Draft EIR will provide draft concept layouts and urban designs. A1 hard copies of these drawings will be made available to the public in the Sandringham Library and will be available during the public meeting. |

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| | | General | |
| Ms Assimacopoulos highlighted that consideration should be given to the use of human sewage as an energy source. | Ms Alys Assimacopoulos (Resident) | 4/09/2012 by e-mail and 16/10/2012 by e-mail | This suggestion will be raised and discussed with the developer. We must point out however that any form of on-site digestive plant to treat human effluent for the purposes of creating gas for energy would require a Waste Management Licence which would require the approval of Johannesburg Water Department. Details of this alternative will be provided within the Draft EIR. |
| Mr Gubb would like for the development to blend in with the surrounding landscape. | Dr Peter Gubb (Resident) | 18/09/2012 by fax | A Visual Impact Assessment will be conducted during the EIR phase in order to assess the visual impact of the development and also to recommend mitigation measures. The proposed development layout also makes provision for open spaces with a system of wetlands/ ponds to increase the aesthetics and compliment the surrounding environment. Special emphasis is given to retaining existing trees, creating generous internal open spaces and ensuring that the development has an attractive appearance from the public streets. |
| Ms du Plessis enquired as to what the difference between 'residential 1' and 'residential 3' was. She also enquired as to what the envisaged timing on the project was and when construction was due to commence. | Ms Erica du Plessis (Resident) | 19/09/2012 by e-mail | Residential 1, includes approximately 314 single residential stands (i.e. single dwelling homes); Residential 2, includes 40 properties of duplex type town houses; and Residential 3 includes 110 units of 2, 3 & 4 storey apartments. All necessary approvals could potentially be in place sometime in 2014. Construction could then commence approximately 3 to 6 months after obtaining all necessary approvals and depending on conditions at the time, and market conditions. |
| Ms Laserson pointed out that the wishes of the majority of the community should be taken into consideration and the no-go alternative considered. | Ms Marian Laserson (Resident) | 22/09/2012 by e-mail | The public participation process dictated within the legislation allows for any and all I&APs to register and participate within the application process. The no-go alternative is also a requirement and will be assessed within the Draft EIR and ultimately the relevant authorities will be the parties that determine the granting of specific rights. |
| Adv Subel stated that there should be minimal encroachment on the surrounding suburbs and that the development should not impact negatively on the property values in the area. | Adv. Arnold Subel (Resident) | 10/10/2012 by e-mail | • The proposed township development does not physically impact on the surrounding suburbs. Any indirect effect will be taken into account and the Draft EIR will have to assess the impact the proposed development will have on the surrounding community, specifically in terms of associated |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| | | | infrastructure. Cognisance of the market prices in the area has been considered during a detailed assessment of the characteristics of the property and its surrounds and a conceptual urban design and planning process. The applicant believes that the proposed urban design reflects sensitivity towards encroachment on the surrounding suburbs and that the proposed development will not impact negatively on the property values in the area and could positively effect current land values. |
| • Mr Defries stated that he is against any development on Huddle Park. | Mr Shawn Defries (Resident) | 16/10/2012 by fax | Objection noted. |
| Ms Yiannoulukis requested responses to the following questions: Q1: When can we expect construction of the new development to commence? Q2: Are there plans (other than Appendix 1.2.) that we can view? Q3: What number of residences do they plan to build i.e. number of homes? Anticipated number of residents is estimated at what? Q4: Within the retail space: Approx. size of retail space is estimated at and how many stores are expected to be erected? The store mix: what stores do we expect in the shopping space: pubs, etc? Q5: Do they still plan to erect a hotel and casino? Q6: Are there plans to build any schools within the development? Q7: Cellphone masts are expected to be located where? Q8: Can we expect advertising space be allocated on the perimeter boundary walls directly opposite the | MS Tonia Yiannoulakis On behalf of the SAHETI School | 16/10/2012 by e-mail | A1: Huddle Investments (Pty) Ltd has commenced with the Environmental Application and Public Participation Processes. They have also started with the Town Planning process, and expect to lodge the Town Planning Application by the end of 2012 or early 2013. Prior to construction commencing a number of approvals needs to be obtained, including the Environmental and Town Planning Authorisations to proceed. They hope to have all necessary approvals in place sometime in 2014. Construction could then commence approximately 3 to 6 months after obtaining all necessary approvals and depending on conditions at the time. A2: The Draft EIR will provide draft concept layouts and urban designs. Huddle Investments has previously communicated their willingness to present their plans in an informal meeting. A3: The current proposal includes approximately 314 single residential stands (i.e. single dwelling homes); 40 residential 2 properties (i.e. duplex type town houses); and 110 residential 3 units (i.e. 2, 3 & 4 storey apartments). In total approximately 464 "homes" are planned for the property. A4: The applicant is applying for approximately 10,000 sqm of gross lettable area for the community orientated retail component. It is anticipate that the development of the retail centre will be phased. The number of stores has not yet been determined, as the design for the retail centre has not yet been undertaken. It is anticipated that the future tenants will be driven by a |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| school? I.e. along Civin and Club (towards Sandringham). Q9: Road widening is planned where? Can we expect other entrances with traffic lights to the development? If so where? | | | tenant mix that serves the needs of the community. A5: NO. This has never been considered and / or planned by the applicant. A6: There are currently no such plans. The applicant may consider including a crèche aimed at the residents of the estate, but a final decision in this regards has not yet been made. A7: No application for a cellphone mast has been included in any of the applications. A8: The applicant will erect construction signage and marketing / promotion signage on the township, aimed specifically at the sale of residential properties and at tenanting the retail centre. There will also be signage promoting the tenants of the retail centre. The applicant is mindful of the schooling and residential nature of the area and will ensure that any such signage is appropriate to the urban context. A9: Road widening will be required for a portion of Club Street. There will also be upgrades to certain intersections in the area to improve the current traffic flow. A detailed TIA is underway, which will be made available for review and consideration in the Draft EIR. |
| Mr Klaff wishes to add his name to the list of objections to the proposed redevelopment of Huddle Park for any other purpose other than recreation. | Stan Klaff (Resident) | 22/10/2012 by e-mail | • There is no objection list – however this comment has now been captured in this Comments and Responses Report to be submitted to the Competent Authority (GDARD). |
| Mr & Ms Da Silva strongly object to any development in the Huddle Park vicinity. | Mr & Ms Da Silva (Residents) | 22/10/2012 by e-mail | Objection noted. |
| • Mr Maree states that manner in which INVESTEC managed to purchase the land on the corner of Club Street extension and Club Street has not been entirely transparent and says that it raises concerns as to future transparency regarding what actually is going to be developed on the corner. | Mr Pierre Maree (Resident) | 26/10/2012 by e-mail | The applicant purchased approximately 53 hectares of land at Huddle Park in response to a public tender process announced and run by the City of Joburg during 2011. The Draft EIR will contain more details as to the proposed development, together with concept urban designs. |
| Denny is of the opinion that this proposed development will in no way benefit the citizens of Johannesburg and in addition will endanger the existence of large parts of Alexandra. | Denny Rademeyer (Resident) | 29/10/2012 by e-mail | Objection noted. All stormwater generated by the proposed development will be attenuated on site, within the open space areas proposed within the proposed development. More details of the stormwater attenuation and management plan will be provided in the Draft EIR. |

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| | Interest | in Investment Opportunit | и — — — — — — — — — — — — — — — — — — — |
| Mr Kunitz requested more information and expressed his interested in purchasing a residential stand. | Michael Kunitz | 4/09/2012 by e-mail | Noted |
| Ms Goldman expressed her interest in purchasing a unit within the proposed development. | Ms Alice Goldman | 4/09/2012 by e-mail | |
| Mr Yiallouris asked to be registered as an I&AP and expressed an interest in purchasing a unit within new development. | Mr Louis Yiallouris | 13/09/2012 by e-mail | |
| • Emlyn expressed an interest in the development asked to be registered as an I&AP and to be notified when the development commences. | Emlyn Hutton | 05/11/2012 by e-mail | |
| Mr Sandro Gennari asked to be registered as an I&AP and expressed an interest in making a retirement investment in the new development. | Mr Sandro Gennari | 05/11/2012 by e-mail | |
| Mr Alex Stivastis requested information about a possible investment in the development | Mr Alex Stivastis | 23/01/2014 by e-mail | |
| | Ing | outs from Authorities | |
| The CoJ Dept of Environmental Regulatory Services is of the view that the information provided for this development is not yet enough to issue informed comments. CoJ: EM recommends that the public participation process be conducted in terms of NEMA EIA regulations 2010 (including proof of site notice, newspaper advertisement, notification of I&APs and comments received). CoJ:EM indicate that a sound stormwater management plan ensuring there is no difference between pre and post development flows must be designed and implemented (by adopting the principles of Water Sensitive Urban Design Systems – WSUDS – and | Ms Lebo Molefe on behalf of City of Johannesburg Department on Environmental Regulatory Services | 23/10/2012 by e-mail | Detailed information will be provided during the Environmental Impact Phase based on the outcome of the following studies: Ecological Verification Assessment; Visual Impact Assessment; Noise Impact Assessment; Social Impact Assessment; Traffic Impact Assessment; and Wetland Delineation and Functional Verification Assessment. The Public Participation Process for the proposed development commenced on 4 September 2012 with notification of the availability of the Draft Scoping Report and an invitation to I&AP's to submit comments. Appendix 5 of the Final Scoping Report will contain proof of notifications. A stormwater management plan will be submitted with the Draft EIR. All designs / layout plans will comply with the requirements of the CoJ Open |

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| Sustainable Urban Drainage Systems – SUDS). CoJ: EM further recommend that the development layout plan comply with the requirements of the CoJ Open Space Framework in respect of standards and the extent of recreational parks provided as well as guidelines for landscaping. In addition, the layout plan must be superimposed with all the sensitivities derived from the specialist studies/ assessments/ analyses. This plan must be legible and drawn in solid colours. CoJ: EM recommends that all the identified alternatives be assessed individually in order to recommend the best suitable proposal for this development. CoJ: EM also indicates that the EMP should address all the identified impacts and must indicate responsibilities and timeframes. | | | Space Framework and will be forwarded to CoJ: EM for approval during the Draft EIR review period. All sensitive areas will be identified and discussed within the Draft EIR. All proposed alternatives (as outlined in the Draft Scoping Report) will be assessed individually during the EIR phase. The EMP (to be submitted with the Draft EIR) will address all identified impacts and appropriate mitigation measures. Responsibilities and timeframes will be indicted in the EMP. |
| | Ad | ministrative Requests | |
| Ms Assimacopoulos requested an electronic copy (CD) of the Wetland and Heritage Specialist Reports. She asked for clarification over the comment period (i.e. why do I&APs have 30 days for comment and state departments, 40 days) and also wanted to know when the assessment will be completed. Mr Stillerman requested further information based on the advertisement in the North Eastern Tribune (Week | Ms Alys Assimacopoulos (Resident) Mr Eric Stillerman (Resident) | 4/09/2012 by e-mail 4/09/2012 by e-mail | A CD containing the Wetland and Heritage Reports was sent to Ms Assimacopoulos on 07/09/2012. The reason why it seems that the days do not add up is because the 30-day public review period excludes all Jewish Holidays (as previously requested by the community). State Departments have 40 calendar days, as dictated within the EIA legislation. A notification letter and comment sheet was e-mailed to Mr Stillerman on 06/09/2012. |
| ending 7 September). Mr Stillerman also requested to be registered to comment. Prof. Grossman requested a CD of the Draft Scoping Report including Wetland and Heritage Reports. | Elly Grossman | 9/09/2012 by e-mail | Mr Stillerman was added to the Registered I&AP Database. A CD containing the Draft Scoping Report, including the Wetland and Heritage Reports, was posted to Prof. Grossman on 11/09/2012. |

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| • Mr Lennox requested a locality plan and stated that ESKOM Transmission is not affected by this application. The application was forwarded to the ESKOM distribution division (contact person: Christo Louw). | Mr Eddie Lennox (ESKOM) | 10/09/2012 by e-mail and 11/09/2012 by e-mail | Locality and Layout plan e-mailed on 10/09/2012. |
| Mr Fuchs requested copy of the report. | Mr Daryl Fuchs (Save Huddle Park Community Group) | 17/09/2012 by e-mail | A copy of the Draft Scoping Report was e-mailed to Mr Fuchs on 17/09/2012. |
| Ms Francis requested that all available information should be posted to her. | Ms Dulcie Francis (Resident) | 16/10/2012 by fax | • SEF delivered a copy of the Draft Scoping Report to Ms Francis on 30/10/2012. |
| • Mr Chadwick requested that a CD with all specialist studies be posted to him. | Mr Roger Chadwick | 21/10/2012 by email | • SEF posted a CD with the Draft Scoping Report including all specialist studies to Mr Chadwick on 24/10/2012. |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE | | | |
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| NATURAL ENVIRONMENT | | | | | | |
| Concert | ns with regards to loss of O | pen Space & Associated Faur | na & Flora | | | |
| Upset about the proposed development and the loss of open space and public area, as well as the fauna and flora inherent to the area. The greenery and bird life is unique and cannot be compared. It has been part of the lifestyle of all residents in the area and neighbouring Bedford Park, Senderwood and St. Andrews. To develop this glorious and vital ecological space would be tragic – for the sake of another shopping mall/ retail/ hotel space. | A.R. Economacos | 27/02/2013 by email to GDARD | The natural environment has been considered through the various specialist studies and the assessment is included in the DEIR. | | | |
| Objects to turning Huddle Park into an overcrowded business and residential zone in place of the refreshing green lung it is providing an already busy and built area. She requested GDARD to consider the following: Source of valuable wetland positively influencing the ecology of a much wider system of Johannesburg; it is a "green lung" providing space for health air and healthy activity and necessary natural beauty which is the right of all citizens to enjoy; it does not have to be created by already exists as such and the Municipality and Big Business has no right to disregard the needs and voices of the public. | Mrs Debbie Alcock | 06/03/2013 by email to GDARD | The natural environment has been considered through the various specialist studies and the assessments are included in the DEIR. | | | |
| Mention of a few indigenous species, the ignorance of our predecessors does not mean that the current generation is incapable of replacing alien vegetation with vegetation indigenous to the area. There are very old oak trees – exotic trees, true, however these oaks have historical value and should not be removed. | Janet Brodrick | 05/02/2013 by email to SEF | The natural environment has been considered through the various specialist studies and the assessments are included in the DEIR. | | | |
| Raised the following concerns: The necessity for the proposed reduction in green belt areas The impact to the surrounding golf course/ water table/ pollution | Ivo Varanini | 13/10/2012 by Comment Sheet via email to SEF. Followed up on 10/05/2013. | The natural environment has been considered through the various specialist studies and the assessments are included in the DEIR. | | | |
| Environmental issues – Huddle Park is an important green lung for the North Eastern areas of Johannesburg. It is also a wetland area. All this will be compromised by development on the Huddle Park premises. The widening of Club Street will require the removal of some 41 mature trees – this is unacceptable. | Pierre Maree (for and on behalf of Dean Wallace) | 20/02/2013 by email to GDARD | The natural environment has been considered through the various specialist studies and the assessments are included in the DEIR. | | | |

Table 3: Detailed Comments and Responses – FINAL SCOPING REPORT

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| Objects to the proposed development of Huddle Park, will not repeat objections made by colleagues, however will provide more practical objections to the scoping report: The proposed development is contrary to the City's policy on the maintaining and retaining of public open spaces. The proposal to develop many hectares of Huddle Park will destroy the wetlands and wildlife that is found there. | Ray Wolder | 26/02/2013 by email to GDARD | The natural environment has been considered through the various specialist studies and the assessments are included in the DEIR. |
| | Concerns with regards t | o Stormwater Management | |
| The concern regarding the whole issue of stormwater, flooding and the wetland has not been addressed. It is my concern that the wetland would be put under extreme pressure resulting from this development, the statement that it does not form part of the development is irrelevant, and it will be influenced by it. The statement that stormwater will be attenuated on site is misleading. The report must include detail calculations of the flow of stormwater, floodwater (adjusted for global warming effects) and the impact on the wetland and downstream environment, with particular reference to Alexandra. | Denny Rademeyer | 19/02/2013 by email to SEF | An in-principle Stormwater Management Plan (SWMP) is discussed in the Draft EIR. All proposed developments must comply with the minimum standard which states that the post-development stormwater flows are not to exceed pre-development stormwater flows – the proposed Huddle Development will comply with this standard. A detailed SWMP will be compiled once the Environmental Authorisaton and Town Planning Approvals have been obtained. This detailed SWMP will form part of the Water Use License Application (WULA) which will be submitted to the Department of Water Affairs (DWA) for review and consideration towards issuing a Water Use License for the proposed development. |
| | BUILT EN | VIRONMENT | |
| | Concerns with regar | ds to Traffic Congestion | |
| Residential development would cause major congestion on the roads in the area – note the traffic caused by King David School mornings and afternoons. The feeders to Saheti and St Andrews and Sandringham are less obstructive but all this would change and become gridlocked by any development. | A.R. Economacos | 27/02/2013 by email to GDARD | A detailed Traffic Impact Assessment (TIA) is included in Appendix 6 |
| By going ahead with the proposed development in a district where two schools already exist, and alongside two very busy main entrance roads leading into Johannesburg is against the wishes and needs of the Public who are trying to retain the positive qualities that exist now in this area instead of turning it into a nightmare of overcrowded shops, dense high-rise accommodation, and incessant noisy traffic. Although she lives in Springs, she regularly visits the east part of Johannesburg for medical reasons, religious affiliations and close family members who live in adjacent areas. Feels fully justified in | Mrs Debbie Alcock | 06/03/2013 by email to GDARD | of the Draft EIR. Specialist studies are only addressed within the EIR Phase of the EIA process. All the traffic upgrades and improvements highlighted within the TIA will be implemented by the Applicant. The phasing of the upgrades and improvements will be decided through discussions between the Applicant and the Johannesburg Roads Agency (JRA). |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| registering her objection to the proposed development of Huddle Park. | | | |
| Traffic impact assessment must be detailed and include calculations, traffic counts and flow patterns. A summary statement without support documentation is just not acceptable. The southbound flow along Club Street and the Club/Linksfield intersection is of specific concern, particularly as additional traffic lights will no doubt be required. It is of concern that the report could be published without this study being made; it is a key issue to the viability of the whole project. | Denny Rademeyer | 19/02/2013 by email to SEF | |
| Raised the following concerns: The impact of additional vehicle traffic on club street, through Orange Grove | Ivo Varanini | 13/10/2012 by Comment Sheet via email to SEF. Followed up on 10/05/2013. | |
| Traffic patterns are already over stretched. Should E-tolling come into effect, Linksfield Road, Club Street and Civin Drive will become intolerable and impassable. The development will add to the enormous inconvenience and cost to residents and road users. | Janet Brodrick | 05/02/2013 by email to SEF | A detailed Traffic Impact Assessment (TIA) is included in Appendix 6 of the Draft EIR. Specialist studies are only addressed within the EIR |
| Lack of traffic study. The 2012 traffic survey was omitted from the Final Scoping Report. Very high traffic volumes already occur, particularly in the vicinity of King David School. Since 2012 there has been a significant increase in the traffic volumes on the road thereby invalidating any previous traffic surveys. Access in to Club Street from Golf Street, Gemil Street and Linksfield Square Shopping Centre is hazardous at the best of times. There is considerable east/west and west/east congestion and additional pressure on the roads relating to the traffic coming and going to St Andrews School, Saheti School and Sandringham High. Additional traffic as a result of the proposed development of approximately 464 units and the shopping centre will add to the already heavy burden of traffic on Club Street thereby affecting Senderwood, Linksfield, Linksfield North, St Andrews, Sandringham, Bedford Park and Linksfield Ridge. Club Street becomes a single lane from King David School towards Orange Grove, thus widening the road before this point will not alleviate the bottleneck at this point. Existing traffic problems will be exacerbated by the additional volumes coming from the proposed development. Point B26 of the Final Scoping Report provides no detail regarding how the negative impact of construction and development will be mitigated. | Pierre Maree (for and on behalf of Dean Wallace) | 20/02/2013 by email to GDARD | Phase of the EIA process. All the traffic upgrades and improvements highlighted within the TIA will be implemented by the Applicant. The phasing of the upgrades and improvements will be decided through discussions between the Applicant and the Johannesburg Roads Agency (JRA). |

| COMMENT RAISED Objects to the proposed development of Huddle Park, will not repeat objections made by colleagues, however will provide more practical objections to the scoping report: • The increase in the volume of traffic will greatly exacerbate an already impossible traffic situation. The development proposes to build a minimum of 500 residential units or maybe more. This is high density and totally unacceptable to the residents in the area. • The proposed commercial development will bring in further traffic | INTERESTED AND AFFECTED PARTY Ray Wolder | DATE & METHOD OF COMMUNICATION 26/02/2013 by email to GDARD | RESPONSE A detailed Traffic Impact Assessment is included in Appendix 6 of the Draft EIR. Specialist studies are only addressed within the EIR Phase of the EIA process. All the traffic upgrades and improvements highlighted within the TIA will be implemented by the Applicant. The phasing of the upgrades and improvements will be decided through discussions between the Applicant and the Johannesburg Roads Agency (JRA). |
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| onto the existing roads which are presently inadequate and the proposed plans to improve these roads will not be sufficient to alleviate the traffic chaos in the area especially at peak times. | oncorrec with regards to pr | occura on Samiaa Infrastruat | |
| Not happy with the proposed development of Huddle Park. Various connection points are listed for services; twice recently there have been burst water pipes in Senderwood, and indication that the infrastructure is inadequate. The Huddle Park development will exacerbate this and the developers do not suffer the consequences. The long-suffering residents have to endure having no water until the repairs are affected. Same goes for electricity. | Janet Brodrick | essure on Service Infrastruct 05/02/2013 by email to SEF | The relevant service providers for water, sewage and electricity have confirmed sufficient capacity within the existing network to supply and/or accommodate the proposed development. Refer to Appendix 7 of the Draft EIR for approval letters. |
| Q | uestions and concerns with | regards to Commercial Activ | ities |
| Shopping Centre – there are already shopping facilities in the area. Shops have been standing vacant at Linksfield Square Shopping Centre for quite a number of months. Any further shopping outlets will negatively affect existing retail outlets. Linksfield is within a short driving distance from Eastgate, Norwood & Balfour Park. | Pierre Maree (for and on behalf of Dean Wallace) | 20/02/2013 by email to GDARD | The township application is required to motivate the need for the proposed retail development. Full details will be found in this application and all interested and affected parties will have the opportunity to comment on the township application. The proposed development will not include a shopping mall, but rather a 4.8ha neighborhood type business and retail development. The applicant is applying for approximately 10,000 sqm of gross lettable area for the local community orientated retail component. It is anticipate that the development of the retail centre will be phased. The number of stores has not yet been determined. It is anticipated that the future tenants will be focused around food, service and specialty shops, serving the needs of the demographic profile of the local community. The Final EIR will provide more information on the layout of the |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| Raised the following concerns:The necessity of additional businesses in the area. | Ivo Varanini | 13/10/2012 by Comment Sheet via email to SEF. Followed up on 10/05/2013. | proposed neighborhood. The Final EIR will provide more information on the layout of the proposed neighborhood. |
| Objects to the proposed development of Huddle Park, will not repeat objections made by colleagues, however will provide more practical objections to the scoping report: The proposed Commercial component with offices and shops is ridiculous, as the area is already served by many shopping malls within a 5km radius. The area is saturated and residents do not require any more concrete buildings in the area. It is a well-known fact that the residents in the area re in favour of retaining Huddle Park as public open space, to use it for playing golf which was its original use, to restore the wetlands and assist in bringing back the abundant wild life and to develop walking and or riding trails and retain all the beautiful mature trees and not to build high density houses, shops and offices. | Ray Wolder | 26/02/2013 by email to GDARD | The township application is required to motivate the need for the proposed retail development. Full details will be found in this application and all interested and affected parties will have the opportunity to comment on the township application. The proposed development will not include a shopping mall, but rather a 4.8ha neighborhood type business and retail development. The applicant is applying for approximately 10,000 sqm of gross lettable area for the local community orientated retail component. It is anticipate that the development of the retail centre will be phased. The number of stores has not yet been determined. It is anticipated that the future tenants will be focused around food, service and specialty shops, serving the needs of the demographic profile of the local community. |
| | | T & GENERAL CONCERNS | |
| Regarding the concern noted by several I&AP's of possible bacterialogical contamination from the fever hospital Graveyard, the statement that "hospitals are managed extremely strictly" entirely misses the point. Deceased patients, usually itinerant miners and soldiers of fortune from all parts of the world, were buried here long before "strict management" was in place, possibly as early as the 19th century. In short we just do not know what exotic fevers lurk under the soil in that graveyard and could be brought to the surface by floodwaters resulting from this development, climate change or other disturbance of the graves. A thorough investigation, possibly with UN or international input is required to establish the status of this graveyard, which in any event should be moved. | Concerns with req Denny Rademeyer | gards to Public Health 19/02/2013 by email to SEF | The Sizwe Tropical Disease Hospital is located to the north of the proposed development on the other side of Club Street. The probability of contamination and infection of people by Anthrax is very low – kindly refer to the impact assessment in the Draft EIR in Section F-3.2.6 and the Comment on Anthrax submitted to SEF by Professor Adriano G Duse: Chief Specialist, Chair and Academic Head: Department of Clinical Microbiology and Infectious Diseases NHLS and Wits School of Pathology in Appendix 6 of the Draft EIR. |
| | | pplication Process (including | |
| Unconvinced that a proper detailed ecological, traffic or town planning study has actually been undertaken by experts or the | A.R. Economacos | 27/02/2013 by email to | The detailed studies are only undertaken and presented during the Environmental Impact Reporting (EIR) Phase of the EIA process – as |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| relevant departments. It would also be interesting to see who paid for these "studies" to allow such a development to have already reached this stage. | | GDARD | per legislation. The Draft EIR includes a detailed ecological assessment and traffic impact assessment. The town planning application is a separate application process which is currently underway and managed by the appointed Town Planner. The Environmental Authorisation and Town Planning Applications are paid for by the Applicant |
| The Final Scoping Report is unacceptable for the following reasons: Inadequate and contains two irrelevant sections to bulk it out – the Heritage Report from 2007 and Wetland Report for the wetlands which are not included in the portion of ground. The acquisition of the property by the applicants is being investigated at present by the Public Protector – if the sale is overturned, the EIA is not necessary. Public participation is extremely poorly undertaken for the Final Scoping Report – the EAP Never called a public meeting; Has not held Focus Group Meetings; The form for registering as an I&AP did not give enough information, hence the public did not comment more fully, the public expected that their concerns would be discussed at Focus Group Meetings; An entire suburb and a portion of another suburb were not included in the knock-and-drop, even though they will be extremely inconvenienced by the increase of traffic which would be generated by the proposed development. Refers to Linksfield North and to a portion of Linksfield which is located on the north side of Club Street, which only have two accesses to their enclave, both of which are already problematic from a traffic point of view; and There are no comments from Ekurhuleni Municipality, across the road from the development. This municipality is not on the list of persons contacted, a serious omission. There is no indication that the councillors for Ekurhuleni were notified of the proposal. Councillor Margaret Radebe, Johannesburg Ward 81 was not notified, even though her ward lies across the road from the proposed development. | Marian P Laserson | 20/02/2013 by email to GDARD | paid for by the Applicant. The following responses are relevant: The Heritage Report is relevant as it confirms that no heritage resources exist on the proposed development site. This confirmation is required as part of the EIA process. The Wetland Report also confirms that no wetlands exist on the proposed development site – also a requirement in terms of the EIA process. An EIA can be undertaken on any portion of land with or without landowner consent – the only requirement is that the landowner be notified of the application and subsequent studies to be undertaken. The minimum requirements as stated within the EIA Regulations for public participation were met and in fact exceeded. A public meeting and/or focus group meetings are not necessary during the Scoping Phase, nor was it deemed necessary as a Public Meeting will be held during the EIR Phase at which time information and feedback from specialist studies will be available for presentation and discussion. No I&APs specifically requested focus group meetings – as can be seen by comments captured from I&APs during the Draft Scoping Report review period. The minimum requirements as stated within the EIA Regulations for public participation were met and in fact exceeded. Knock-and-drops are only undertaken to ensure that all directly adjacent landowners and occupiers of land are notified – the newspaper advertisements and numerous site notices erected are purposed to reach the greater surrounding communities. With regards to the Ekurhuleni Municipality – only the Municipality within which the proposed activity/ development falls is required to be included within the EIA public participation process. However, SEF has contacted the Ekurhuleni Municipality and discussed the proposed project with them and those who indicated they would appreciate inclusion within the EIA process have been captured within the I&APs database. |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| There is no traffic impact study. Crime – the claim that crime will not increase during the construction phase is totally without foundation – statistics exist which prove that there is a marked increase in crime associated with any building development. There is absolutely no need for more business, particularly shops, in the area. There is already an oversupply and many of the shopping centres in the area are battling to keep going. Alternative developments are poorly discussed. The no-development alternative is definitely preferred to having a private housing development on the site. If the sale of the property is overturned the current lessee of Huddle Park will apply to lease the portion in question and reinstate the golf course option, or other public recreation and sports facilities, much needed in the area. | | | Database. The Traffic Impact Assessment is included in Appendix 6 of the Draft EIR – specialist studies are not to be included within the Scoping Phase of the EIA process. Crime has been assessed within the Draft EIR – in Section F-3.2.7 and Section F-4.2.5. The impact on crime is also discussed within the Social Impact Assessment Report in Appendix 6 of the Draft EIR. The comment regarding alternatives is noted – these are discussed and evaluated within Section E of the Draft EIR. Again, the Scoping Report is not the correct report in which alternatives are discussed and assessed in detail. |
| area. SEF and GDARD regulators cannot continue with the Scoping and EIA, as the Scoping process and procedures to date are squashed due to the inability to show basic legal compliance with processes and procedures preceding any EIA Scoping and indeed even an EIA registration. Such documentation has repeatedly been requested to no avail. By way of procedural reference the said time gates and limited time period to respond to what is essentially an irregular EIA Scoping are also of no meaning. The role and function of the "independent EAP" needs to be looked at. That the regulators at GDARD then register the EIA's without proof of due basic legal compliance etc. is also intrinsically incorrect and also renders the procedures null and void. Both the applicant and the authorising agents often ignore the legality of the application and continue <i>in vacuo</i>. There must be provisions at law that render such a process as irregular if the basic paperwork is not proven, available for scrutiny and above board and not the subject of investigation by the Public Protector. Where do the applications for town planning and building regulations and rights sit at this point, as they too cannot operate <i>in vacuo</i>, and a comprehensive EIA with positive authorisation will have to come | Shan Holmes | 21/02/2013 by email to SEF | An EIA can be undertaken on any portion of land with or without landowner consent – the only requirement is that the landowner be notified of the application and subsequent studies to be undertaken. Thus, the acquisition of the land is irrelevant to the EIA process. The final Town Planning Approval cannot be issued until a positive Environmental Authorisation is obtained. The Town Planning Application has been submitted to the Municipality and the Municipality has advertised it and requested I&APs to comment on the application. This process can run concurrently with the EIA application. |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| The Final Scoping Report has been released by SEF and comments must be submitted before 20 February 2013. The report raises no environmental concerns and basically rubber stamps Investec's plans in a way that town planners need to see to accept that an "investigation" was actually done. Due to some files being too large to upload onto the SEF website you have to request a CD or visit the Sandringham Library – this is a ply to cut down on interaction. Noted that there is no traffic study. The Heritage Assessment (34MB) was done in 2006 and refers to buildings on Huddle Park. Since there are no building son Investec's 53ha, this section is totally irrelevant. The Wetland Report (on the disk) was done in 2008 and refers to the whole 185ha. There is virtually NOTHING on the Investec 53ha, so it is also irrelevant to the present EIA. The photographs are of Investec's portion and tell us nothing, especially for those of us who know the site. Public participation provides a great deal of information regarding advertising, comments from public, list of 1&APs, etc. Suggests stakeholders to review and make sure they are properly represented and to read other people's comments. Indicate he would circulate relevant components of this section. The fact is, the site notices were mostly A2 which is rather small for a non-pedestrian area, who in a motor car stops to read them? Requested stakeholders to register as 1&APs with SEF and to criticise the report and to object to the development on any of the | Daryl Fuchs (Friends of Huddle Park) | 06/02/2013 by email to stakeholders | The Traffic Impact Assessment is included in Appendix 6 of the Draft EIR – specialist studies are not to be included within the Scoping Phase of the EIA process. The Heritage Report is relevant as it confirms that no heritage resources exist on the proposed development site. This confirmation is required as part of the EIA process. The Wetland Report also confirms that no wetlands exist on the proposed development site – also a requirement in terms of the EIA process. The EIA process requires that photographs of the site be taken and included within the Scoping Reports and Environmental Impact Reports. SEF welcomes I&APs facilitating other community members and interested parties to participate. All comments received will be included within this Comments and Response Report (CRR). |
| grounds listed. Lack of meaningful communication by SEF and Investec Properties. | Pierre Maree (for and on | 20/02/2013 by email to | The meeting held at the Royal Johannesburg Golf Course was not |
| The meeting held at the Royal Johannesburg Golf Course on 19 November 2012 was of a very superficial nature. | behalf of Dean Wallace) | GDARD | facilitated by SEF and was not part of this EIA process. |
| Irrelevance of large portion of the Final Scoping Report – Appendix 3 (Wetland Delineation & Functional Assessment) refers to the entire area of Huddle Park and not specifically the 53ha. The report | | | The Heritage Report is relevant as it confirms that no heritage resources exist on the proposed development site. This confirmation is required as part of the EIA process. The Wetland Report also confirms that no wetlands exist on the proposed development site – |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| was compiled in August 2008, a great deal has changed between then and now. Appendix 4 (Heritage Impact Assessment) refers to the entire Huddle Park area and not the 53ha. The report as submitted in September 2006. | | | also a requirement in terms of the EIA process. |
| Objects to the proposed development of Huddle Park, will not repeat objections made by colleagues, however will provide more practical objections to the scoping report: The scoping report alludes to heritage buildings which incidentally are not within that portion of Huddle ostensibly sold to Investec and are on the portion that is now part of the restored golf courses under official management of another group. | Ray Wolder | 26/02/2013 by email to GDARD | The Heritage Report is relevant as it confirms that no heritage resources exist on the proposed development site. This confirmation is required as part of the EIA process. |
| Resident in Senderwood and requested a copy of the Final Scoping Report on CD to be posted to him. Enquired as to whether an updated wetland report had been commissioned and finalised and whether a traffic report had been concluded. | Keith Sutcliffe & Associates Inc | 06/02/2013 by email to SEF | SEF posted a CD to the postal address provided. |
| Highlighted that many points of concern raised by them on behalf of Saheti School, require specialist reports such as a Services and Infrastructure Outline Report and a Traffic Impact Study before they are able to comment. The request that as soon as these documents become available to them they will provide comment. | Lloyd Druce of VBGD Town Planners | 12/02/2013 by email to SEF | All specialist studies are included in Appendix 6 of the Draft EIR. |
| List some grievances regarding the process around the proposed selling off of a part of Huddle Park. The scoping report has not been made available for the public. If it is not made available on the website, then either a better web company to support the files to be uploaded must be found or CDs should be posted to lay it all out for correct public information and participation. Requested a CD to be posted to the address provided. | Wendy Newstadt | 14/02/2013 by email to SEF | The Final Scoping Report has been available on SEF's website since 21 January 2013. Two of the specialist studies were too large to upload, however if you click on these studies there is a message that state SEF will post a CD of the full Scoping Report (including specialist studies) on request. SEF enquired if Ms Newstadt would prefer a CD to be posted, if so for her to provide her postal address. She then provide her address and SEF posted her a CD. |
| Raised a concern as to why people have to register before being able to view the Final Scoping Report on the SEF website. Enquired as to why the specialist studies could not be posted on the website and why a CD had to be posted for these. Requested the size of the reports that are too large to upload. Queried the length of the review period and why not allow people two months to comment. | Daryl Fuchs (Friends of Huddle Park) | 28/01/2013 – 05/02/2013 by email to SEF | SEF again highlighted the report is available at the library and also on the SEF website. The report is freely downloadable; the "registration" is to allow people to submit comments, via our website, which are then forwarded to SEF in order to respond to the comments raised. The reference to posting a CD relates to the specialist studies that are too large to upload onto the website (and for people to download), thus I&APs were informed that they could request CDs if they are unable to review the reports at the library or the information within the main Report is not sufficient. |
| | | | The SEF website only allows documents that are 2MB or less to be uploaded – the website host many, many projects hence the need to |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| | | | reduce file sizes. SEF is not prohibiting access to this information; it is simply available through other means. |
| | | | The commenting period is that prescribed in the EIA Regulations, the purpose of the Final Scoping Report (which is not significantly different in content to the Draft Scoping Report) is for I&APs to review whether or not their comments submitted on the Draft Report have been captured and addressed. Thus, the review period is deemed sufficient to achieve this purpose. |
| | General – Concerns related | d to the Purchasing of the Lar | nd |
| It is not entirely clear as to how Investec was able to secure the purchase of the 53ha property in question. | Pierre Maree (for and on behalf of Dean Wallace) | 20/02/2013 by email to GDARD | The applicant purchased approximately 53 hectares of land at Huddle Park in response to a public tender process announced and run by the City of Joburg during 2011. This process does not form part of the environmental application and questions/objections can be addressed to City of Joburgh. A public meeting will also be held for the purpose of the EIA where these questions can be addressed by the Town planner. |
| Objects to the proposed development of Huddle Park, will not repeat objections made by colleagues, however will provide more practical objections to the scoping report: No public participation and no meetings have taken place regarding the sale of portion of Huddle Park over the past few years. Residents have not been adequately informed of the sale nor of the concomitant proposed residential and commercial development and it should be noted that the" knock and drop" information and advertisements re the sale and proposed development did not include Linksfield North which suburb will be directly and adversely affected by this. | Ray Wolder | 26/02/2013 by email to GDARD | The applicant purchased approximately 53 hectares of land at Huddle Park in response to a public tender process announced and run by the City of Joburg during 2011. This process does not form part of the environmental application and questions/objections can be addressed to City of Joburgh. A public meeting will also be held for the purpose of the EIA where these questions can be addressed by the Town planner. |
| Raised the following concerns: Would like to know what the ground for the development was sold for. | Ivo Varanini | 13/10/2012 by Comment Sheet via email to SEF. Followed up on 10/05/2013. | The applicant purchased approximately 53 hectares of land at Huddle Park in response to a public tender process announced and run by the City of Joburg during 2011. This process does not form part of the environmental application and questions/objections can be addressed to City of Joburgh. A public meeting will also be held for the purpose of the EIA where these questions can be addressed by the Town planner. |
| Objects to the proposed development of Huddle Park, will not repeat objections made by colleagues, however will provide more practical objections to the scoping report: | Ray Wolder | 26/02/2013 by email to GDARD | The applicant purchased approximately 53 hectares of land at Huddle Park in response to a public tender process announced and run by the City of Joburg during 2011. This process does not form part of the |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| • The tender for the sale of Huddle Park was kept secret and the residents in the surrounding area were not notified that a portion of Huddle Park had been sold to Investec. | | | environmental application and questions/objections can be addressed to City of Joburgh. A public meeting will also be held for the purpose of the EIA where these questions can be addressed by the Town planner. |
| Concern regarding the transparency of the purchase of land, the issue is tarnishing the image of Investec, a public company that at all times should have a "squeaky clean" reputation. Requested that Investec should make the following information available: The COJ enquiry document and any other pretender correspondence; the completed Investec tender document and any accompanying documents; any post tender correspondence with the COJ; and the COJ letter of acceptance of the Investec offer. | Denny Rademeyer | 19/02/2013 by email to SEF | The applicant purchased approximately 53 hectares of land at Huddle Park in response to a public tender process announced and run by the City of Joburg during 2011. This process does not form part of the environmental application and questions/objections can be addressed to City of Joburgh. A public meeting will also be held for the purpose of the EIA where these questions can be addressed by the Town planner. |
| Objects to the proposed development. Huddle Park is open public space, and should not be sold or disposed of in any way without Public Participation. The amount paid for this development is well below market rates. I consider that the development cannot go ahead without extensive public participation and open discussion of the amounts, the commissions, and the value. Should any sale go ahead, it should be done through open tender, as is required by law in South Africa. | Eileen Thayser | 26/02/2013 by email to GDARD & 07/03/2013 by email to SEF | The applicant purchased approximately 53 hectares of land at Huddle Park in response to a public tender process announced and run by the City of Joburg during 2011. This process does not form part of the environmental application and questions/objections can be addressed to City of Joburgh. A public meeting will also be held for the purpose of the EIA where these questions can be addressed by the Town planner. |
| Objects to the proposed development of Huddle (Linksfield) Golf Estate. Also questions the manner in which the sale of the property was done and the impact that this development will have on the area and its residents. Requested all environmental studies/ reports completed. | Kobus Rheeders | 12/02/2013 by email to SEF | The applicant purchased approximately 53 hectares of land at Huddle Park in response to a public tender process announced and run by the City of Joburg during 2011. This process does not form part of the environmental application and questions/objections can be addressed to City of Joburgh. A public meeting will also be held for the purpose of the EIA where these questions can be addressed by the Town planner. |
| | G | eneral | |
| The professional qualifications of Mr Dave Rudolph and Ms Vici Napier have not been stated. Could these please be provided for the benefit of I&APs? | Denny Rademeyer | 19/02/2013 by email to SEF | The professional qualifications of Ms Vici Napier and Mr Dave Rudolph have been added to their profiles on page vii of the Draft EIR. |
| Raised the following concerns: Who is benefiting: which company, what benefits for the surrounding residents and what are the long term plans for the remaining area | Ivo Varanini | 13/10/2012 by Comment Sheet via email to SEF. Followed up on 10/05/2013. | |
| Requested advice on what stage the whole EIA is at for the proposed development and how far the developing company still has to go to receive final approval for the scheme. | Alex Stivastis | 24/05/2013 by email to SEF | SEF is currently compiling and finalising the Draft Environmental Impact Report for the proposed Huddle Development. This report together with the entire specialist studies will then be submitted for review and comment for a minimum period of 40 calendar days – I say |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| | | | minimum as the Applicant agreed to exclude Jewish School Holidays from this timeframe – as you may have noticed for the review period of the Scoping Reports. |
| | | | There will also be a public meeting held at which the Draft EIR will be presented and discussed. All registered I&APs will be notified of the review period and meeting and the Applicant has also agreed to publish adverts in the local newspapers (same ones as for the Scoping Phase) again announcing this report review period and meeting. |
| | | | Thereafter the Comments and Response Report must be compiled (with comments received on the Draft EIR) and the report finalised to a Final EIR. This report is then again submitted for review and comment concurrently with the submission to GDARD for review towards a decision. GDARD then have approximately 120 days in which to review the report together with all comments received during the public participation processes and make a decision – however, they also have an automatic extension timeframe should they not be able to reach a decision within this timeframe and that extension is between 60 – 90 additional days. So, the EIA still has a way to go. We hope to have the report ready for |
| | | | public review towards end June/ early July – however SEF cannot commit to a date yet. |
| The content of the Final Scoping Report is the same as the Draft Scoping Report submitted in September 2012; however the Department has noticed that the public participation process is underway as prescribed by law. The comments submitted on 22 October 2012 must be addressed in full within the Environmental Impact Report. | Nozipho Maduse / Tshilidzi Tshimange (CoJ: Environment, Infrastructure and Services Department) | 18/02/2013 by email to GDARD & SEF | Comment noted. |
| Thank you for the email. I will read when I have time. UnfortunatelyI will not be available for the 26th Feb meeting. Would | Alys Assimacopoulos | 29 /01/2014 by email | We have noted your request and will ensure that you receive the minutes of the meeting. |
| it be possible to get a copy of the minutes? Thanking you in anticipation | | | |
| I have not been the councillor in that ward for 7 1/2 years so I think that your database is hugely out of date. Please remove me. | Carol Lewin | 29 /01/2014 by email | Your requested has been noted. You have been removed from the database. |

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| Please can you forward me a locality in order to determine whether any provincial transport infrastructure is affected or not. | Maurice C. Mogane | 31/01/2014 by email | The requested information was forwarded and a CD copy of the report was sent to Mr Mogane |
| Thank you for the CD and locality plan. The development is not directly affected by any provincial roads (an official letter will be posted to your firm in due course). | | 29/01/2014 by email | Comment noted, thank you. |
| However, going forward there may be traffic issues to be attended to with regards to provincial Road K60 (Linksfield Road) to the north east of the proposed development. | | | |
| | Administra | ative Requests | |
| Cannot open or download documents and requested to know whether a detailed summary of findings will be sent out. | Colin & Alice Goldman | 13/02/2013 by email to SEF | An updated Comments and Response Report will be included in the DEIR. |
| Had not received notification of the Final Scoping Report by mail or email. Registered comment on 26 September 2012, so expected a notification earlier. Mrs Kathi Niemann has also not received notification. Requested confirmation of when notifications were set out. Please could SEF send Mrs D. M Francis a full copy of the report as she has no access to a computer and is unable to view the report at the original sector. | Wendy Carroll | 05/02/2013 & 07/02/2013 by email to SEF | SEF investigated and rectified those notification emails that were "undelivered". SEF delivered a copy of the Final Scoping Report to Mrs DM Francis at the address provided. |
| the Sandringham Library? Requested registration as an I&AP and requested CD of all relevant | Shan Holmes | 06/02/2013 by email to SEF | Registered on the project's database and CDs posted to the postal |
| information to be posted to the address provided. | Carol Lewin | 12/02/2013 by email to SEF | addresses provided. |
| Requested an electronic copy of the Final Scoping Report. | Marisa Wijtenburg | 16/02/2013 by email to SEF | CD was posted to the postal address provided. |
| | Norman Doak | 06/02/2013 by email to SEF | |
| Requested contact details of the relevant person at GDARD to whom comments on the Final Scoping Report should be sent. | Denny Rademeyer | 19/02/2013 by email to SEF | SEF replied with the notification letter that details the GDARD case officer's contact details. SEF reminded Mr Rademeyer to please cc SEF in all correspondence. |
| HEAD Leagues comments were copied to SEF. Did not understand how comments on the Final Scoping Report become part of the very report to which the comments relate. | Raymond Druker | 07/03/2013 by email to GDARD | Comments are captured within this comment and response report – compiled by Ms Marian Laserson. |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| Requested to be registered as an I&AP. | Arthur Barnwell | 19/02/2013 via SEF website | |
| | Stanley Howard | 28/02/2013 via SEF website | |
| | Oscar Cowan | 19/02/2013 via SEF website | Registered on the project's database. |
| | Jack Leslie Cooper (Ward Councillor for Ward 74) | 04/03/2013 by SEF website registration | |
| | Pam Turner (Indo Jet Travel) | 21/06/2013 via email to SEF | |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| | NATURAL | ENVIRONMENT | |
| Concerr | ns with regards to loss of O | pen Space & Associated Fau | na & Flora |
| Mr Wolder feels that the issue of destroying their one and only green open space should be condemned no matter how much Investec tries to argue their point on this matter. She added that the proposed development will destroy the wildlife and wetlands no matter how the developers promise to retain as much as possible. | Ray Wolder | 26/03/2014 by email | Comment Noted. The specialist studies looking at the aspects were undertaken, followed by the verification studies. Possible impacts were identified and assessed. The recommendations made by the specialists have been considered and form part of the submission to the GDARD. Should the recommendations be implemented, the impacts will be minimal. The 2005 Ecological Assessment found that the majority of trees are exotic. It will therefore be better to replace trees felled with indigenous species that will add to the biodiversity value of the greater area. The layout of the proposed development does make up for the open space. This was done with an intention of trying to prevent complete loss of the public open space which is crucial in every residential area and to keep as many trees as possible. |
| Ms Assimacopoulos is concerned that the removals of Eucalyptus trees will more than likely lead to flooding in the area, she adds that currently they absorb a huge amount of water and keep the water table relatively stable. | Alys Assimacopoulos | 10/03/2014 by email | The proposed development will retain as many trees as is practically possible. |
| Ms Newstadt feels that the proposed development impact on the natural resources of the wetland. Ms Newstadt is also concerned that Johannesburg has few numbers of open spaces and Huddle Park should be maintained to serve the inhabitants of the community. | Wendy Newstadt | 28/03/2014 by email | The wetland area (including associated vegetation) that performs the "green lung" function does not fall within the proposed development footprint. The proposed development will reduce the existing open space area by approximately 28.8%. The development will not encroach on the wetland. Recommendations made by the specialist |
| Mr Berry is concerned about the loss of the wetland. | Damon Berry | 27/03/2014 by email | will be implemented. As indicated in the EIR, the buffer zone was established, and no activities will take place within that buffer zone. |

Table 4: Detailed Comments and Responses – DRAFT ENVIRONMENAL IMPACT REPORT

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| Mrs Francis feels that both the proposed developments at Huddle and Sizwe will cause unavoidable loss of biodiversity. The wider eco system will be placed at risk. Johannesburg will destroy its natural assets and its rivers, wetlands, streams and grasslands for future generations. Birdlife, insects and small mammals at Huddle Park will be destroyed. Mrs Francis adds that the residents need a green corridor and green lung. This affects not only nearby suburbs but residents of Alexandra, Edenvale, Bedfordview and Germiston. It is not in keeping with the City of Johannesburg Open Space Legislation. Huddle Park's unique character and cultural assets have been overlooked. | Dulcie Francis | 27/03/2014 by email | Comment noted. It is imperative to assess the cumulative impacts of this particular development. It should, however, be noted that the capacity of the CoJ to provide services to the proposed site was confirmed by the municipality. The issue of infrastructure upgrades needs to be considered by the CoJ since the infrastructure of many places is old. Also, the CoJ needs to ensure that all the new developments comply with the processes standard of the municipality to prevent the cases of new infrastructure that is failing. Though the integrity of the wetland has been compromised by the activities that have taken place in the area, the proposed development will remain outside the wetland zones. As stated above the proposed development will not encroach on the wetland. As recommend in the |
| Ms Carroll feels that both the proposed developments at Huddle and Sizwe will cause unavoidable loss of biodiversity. The area is an intrinsic part of a wider ecosystem. The wetlands at the Huddle Park golf portion provide a hydrological function and prevent or minimalize flooding as well as supporting a population of birds, insects and small mammals. This places the wider eco system at risk. It is likely that both the wetland and parkland will be alienated and adversely affected. The city will be deprived of natural assets and its rivers, wetlands, streams and grasslands will be destroyed. | Wendy Carroll | 27/03/2014 by email | EMPr, the design of stormwater system must be in such a way that no storm water is released into the wetland of concern because polluted stormwater may impact on the The biodiversity of the site has been reduced by the alien species that are occurring on site. It is recommended that the project proponent undertake the removal of the alien species and also retain the indigenous plant species. It is proposed that the critically endangered species of the African Potato and other species are relocated to the nearby grassland subsequent to issuing of the proposal by the relevant authority. |
| Mr Fuchs feels that the developers are building near the wetland because its already degraded and that makes it okay for them to build there. He cannot see how building in a greenfields area can eliminate urban sprawl whilst there are a lot of brownfields areas in the CoJ and that this would destroy the greenfields area. He stated that there is a lack of thought shown in this development, for example, the placement of Residential 2 which is going to be close to the clubhouse. He said that the clubhouse is a loud fun place and this is going to create bad neighbours and result in noise issues | Daryl Fuchs | 26/02/2014 Public Meeting | When the site was identified and purchased by the developer, the details of the ecological state of the property were not known and therefore not considered to have influenced the decision of choosing the site. The specialist studies that were part of the EIA process established the ecological state of the wetland and the entire site. The specialist reports recommended what mitigation measures can be implemented to prevent further degradation of the wetland by the proposed development. The project proponent selected the site due to its compatibility to the kind of development they intend to undertake. The choice of the location is very important for this kind of development and the target market. |

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| COMMENT RAISED | AFFECTED PARTY | COMMUNICATION | RESPONSE |
| Ms Newstadt said that Huddle Park has become relevant to the public it's a green space that people can go to, she cherishes Huddle Park and the developers should not underestimate the passion of the community. She stated that this is a very strong community and they will put up a fight if the development is not lodged in a proper way. | Wendy Newstadt | 26/02/2014 Public Meeting | Comment noted. The green space will still be present, should the proposed development continue. The proposed development will reduce only approximately 28.8% of the existing public open space area. |
| | Concerns with regards | to Stormwater Management | |
| Ms Carroll is concerned that there is no guarantee that proposed drainage measures at Huddle Township will be appropriate or monitored. | Wendy Carroll | 27/03/2014 by email | Should the competent authority (GDARD) issue a positive authorisation, conditions of compliance monitoring during the construction phase need to be included for reasonable period of time post construction phase. It will be the responsibility of the project proponent to ensure that there is compliance to all the conditions of the issued authorisation. Should conditions not be complied with, due processes will need to be followed by the GDARD. |
| | Concerns with | regards to Wetland | |
| Mrs Wijtenburg asked what caused the degradation of the wetland as there are no buildings nearby? The follow-up question was if the developer would help in the rehabilitation of the wetland and if they would help to sort out the sewer problem down the road. | Marisa Wijtenburg | 26/02/2014 Public Meeting | The degradation was caused by the previous developments that occurred upstream. Storm water that was not maintained properly ended up in the wetland causing changes in the biological factors of the wetland. Specialist studies were done in 2007 and the verification studies were conducted in 2013. The wetland is seen as degraded and not severely degraded. Putting buffer zones and proper storm water retention systems in place, as proposed in the development, can help restore the natural balance. |
| Mr Bagg stated that they are in the process of rehabilitating the wetland at their own expense. | David Bagg | 26/02/2014 Public Meeting | Comment noted |
| Mr Eleftheriades said that the power of this community should not be underestimated and would like to get more input regarding the wetland. He stated that the wetland specialist should also be present at the next focus group meeting as the traffic and wetland issues are very important to them. | Christos Eleftheriades | 26/02/2014 Public Meeting | Comment noted. A focus group meeting with the traffic and wetland specialists will be scheduled for September 2014 and all stakeholders notified of this meeting. |

COMMENT RAISED

INTERESTED AND DATE & METHOD OF AFFECTED PARTY COMMUNICATION

RESPONSE

| BUILT ENVIRONMENT | | | | | |
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| Concerns with regards to Traffic Congestion | | | | | |
| Mr Wolder feels that the traffic study concerning Club Street and the impact of all the traffic that will increase due to the proposed development will affect Lancefield-Club Streets intersection and will also reach north to Swemmer Road/George Avenue and into Modderfontein Road. Additionally, he feels that none of the impacts has been investigated. | Ray Wolder | 26/03/2014 by email | A detailed TIA report is appended to the EIR. Possible impacts and applicable factors were identified by the traffic engineers. Mitigation measures were recommended in the report and will form part of the development. There will be several road upgrades intended at minimising the impacts of the proposed project on the current traffic in Huddle. | | |
| Mr Druker feels that the TIA Report is inadequate and misleading; he also adds that the data in the report is out dated. He feels that no data was collected beyond the Club Street and Shelley Avenue intersection. He feels like the development will aggravate the traffic issue that is already a problem. | Raymond Druker | 28/03/2014 by email & fax | The TIA report has been updated with a recent survey considering all the factors that the residents are concerned about. The report of the update study is attached as addendum, to the TIA report. The addendum was produced in August 2014. | | |
| Ms Assimacopoulos is concerned that the addition of the Sizwe development will severely impact the traffic in the area. She adds that the TIA Report is unrealistic; the numbers are lower that what really occurs, especially on Saturdays. | Alys Assimacopoulos | 10/03/2014 by email | The project proponent proposes to undertake the upgrades on the affected roads to mitigate the traffic impacts. The TIA report indicated that these measures will be sufficiently mitigated against traffic | | |
| Ms Newstadt is concerned about the traffic increase which is already a problem in the area. | Wendy Newstadt | 28/03/2014 by email | impacts. The addendum to the TIA confirms that the proposed upgrades will be sufficient. The addendum took into account all the | | |
| Mr Berry is concerned about the increase in traffic in the surrounding area. | Damon Berry | 27/03/2014 by email | current factors impacting on the traffic issues in the area. It is up to the JRA to approve the addendum based on the information | | |
| Mr Stillerman feels that traffic congestion will be heavy and undesirable impacts have not been satisfactorily alleviated. | Eric Stillerman | 14/03/2014 by email | presented in it. | | |
| Mrs Francis is concerned that the proposed Huddle development and Sizwe development will have a negative effect on the traffic. She adds that the existing traffic survey assessments do not take into account the increased traffic volumes following the implementation of e-tolling. She continues to say that there are already high traffic volumes in Club Street during the day, especially around King David School, it is difficult to access Club Street from Gemmil Street already. Additionally, there is already east-west congestion towards the N3 highway; there is congestion on Civin Drive in the vicinity of Saheti School which results in speeding by motorists in Wordsworth Avenue, Senderwood. The three and four- termed schools in the vicinity mean that there is heavy traffic throughout the year. | Dulcie Francis | 27/03/2014 by email | The updated TIA study that was undertaken has confirmed that the proposed upgrades will ensure that the problem of traffic congestion does not increase. The study took into account all the current factors as per the comments from all the stakeholders. Details of the upgrade are provided in section F-424 of the EIR | | |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| Ms Carroll raises the issue that the existing traffic survey assessments are out of date, inadequate and inaccurate and do not take into account the increased traffic volumes following the implementation of e-tolling. There are already high traffic volumes in Club Street during the day, particularly in the vicinity of King David School. There is east-west congestion on the N3 highway, particularly in the morning and late afternoon. The traffic signals proposed in the report will not reduce the bottleneck of vehicles travelling east-west to Orange Grove when Club Street becomes a single lane. The addition of a large number of vehicles, traffic emissions and traffic noise will impact negatively. | Wendy Carroll | 27/03/2014 by email | The TIA report has been updated with a recent survey considers all the factors that the residents are concerned about. The report of the update study is attached as addendum, to the TIA report. The addendum was produced in August 2014 and it highlights the rate of traffic changes that have taken place during the period between 2012 and 2014. The addendum states that the recommend mitigation measures will be sufficient in dealing with the traffic impacts brought by the proposed development. |
| Ms Laserson commented that Civin Drive, St Christopher Road and Spenser Avenue intersection is not in the municipal area of Johannesburg, but is in Ekurhuleni, a report will be required from the Traffic engineers of Ekurhuleni Municipality. | Marian Laserson | 25/03/2014 by email | Comment noted. |
| Mr Mogane stated that in relation to the minutes dated 26 February 2014, the Department is of the view and agrees with the concerns about the current TIA and that an updated traffic impact study must be conducted and that a copy must be lodged with this Department for assessment and approval as provincial Road K68 will be impacted by the proposed development. | Maurice C. Mogane | 15/03/2014 by email | The TIA report has been updated with a recent survey considers all the factors that the residents are concerned about. The report of the update study is attached as addendum, to the TIA report. The addendum was produced in August 2014 and it highlights the rate of traffic changes that have taken place during the period between 2012 and 2014. The addendum states that the recommend mitigation measures will be sufficient in dealing with the traffic impacts brought by the proposed |
| Mr Fuchs wanted to know the dates in which the visual and traffic impact assessments were conducted. He wanted to know which intersection the traffic signal would be at. He then asked if there will be a traffic light at Huddle Park Golf Club entrance and Club Street | Daryl Fuchs | 26/02/2014 Public Meeting | development. The TIA was conducted in 2012 and forecasts until 2014 and the visual impact assessments were conducted in 2012-2013. It is on the intersection just before the club house entrance (Intersection with St Andrews). A traffic light is not needed at every intersection. |
| Ms Laserson stated that she does not understand why the Heritage Impact Assessment (HIA) report was included in the Draft Environmental Impact Report (EIR) as it is irrelevant. | Marian Laserson | 26/02/2014 Public Meeting | The HIA seems irrelevant but it was conducted due to the legislative requirements. The National Heritage Resources Act, 1999 (Act No. 25 of 1999) legislates the necessity for cultural and heritage impact assessment in areas earmarked for development, which exceed 0.5 hectares (ha). This requirement is applicable to this particular development. |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| Mr Eleftheriades wanted to know if there is no drawing or sketch which shows exactly what is at which intersection and if there is a drawing that is being proposed. | Christos Eleftheriades | 26/02/2014 Public Meeting | The sketch is not in the presentation but in the TIA report, the drawing is not yet finalised. |
| He asked if the proposed road upgrade is going to worsen the current traffic issue or if it is going to alleviate it. | | | The issues of traffic have been identified on Club Street and people are struggling to turn right, the road will be upgraded into four lanes two on each side. There will be a traffic light with an upgrade on St Andrews and Donne Avenue. |
| He wanted to know what is being done for the residents and that they do not want to have to deal with the municipality as they have had serious fallouts with the CoJ. | | | The purpose of the upgrades is to address the traffic issue in the area. The proposed road upgrades are going to be shown to the Johannesburg Roads Agency (JRA) for approval. |
| He further stated that things have changed drastically and that the developments that occurred after the TIA was conducted invalidates the EIR. | | | The developer is the one who will be upgrading the roads and not the CoJ. There would be a substantial road upgrade and the upgrade will occur concurrently with the development. An application for the township establishment has been lodged as per section 101 (82) of the township establishment application. |
| Mr Druker stated that the traffic light at Donne Avenue is not in the report and wanted to know what was going to happen at Club Street and Huddle Park Golf Club Exit. | Raymond Druker | 26/02/2014 Public Meeting | There will be a traffic light at Club Street and Huddle Park Golf Club exit. |
| He wanted to know if there would be a traffic light at Civin Drive, St Christopher Road and Spenser Avenue. He also wanted clarity on | | | Yes, there would be a traffic light at Civin Drive, St Christopher Road and Spenser Avenue. |
| what is going to be where as there is a traffic light at Club Street and Civin Drive and at Civin Drive, St Christopher Road and Spenser Avenue intersection. | | | The traffic signal at Civin Drive, St Christopher Road and Spenser Avenue intersection will be optimised and that it is stated in the TIA. |
| He wanted to know what traffic signals will be at Huddle Park Golf Club and Club Street exit. | | | There would be an upgrade at Huddle Park Golf Club entrance and Club Street exits and will try to consolidate the two exits of the development if possible, however the developers still need to talk to the owners of the club. |
| He further stated that the TIA was conducted in March 2011 it is thus out-dated and was based on ancient readings. He stated that the developer is the reincarnation of the previous developer, and they had a TIA report done by Ove Arup engineers in 2007 and that | | | The TIA report has been updated with a recent survey considers all the factors that the residents are concerned about. The report of the update study is attached as addendum, to the TIA report. The |
| there are fundamental differences between the two reports. For example, the report done by Goba Engineering stated that there are 950 vehicles per hour on Club Street during peak hours and the report done by Ove Arup engineers stated that there are 1317 per | | | addendum was produced in August 2014 and it highlights the rate of traffic changes that have taken place during the period between 2012 and 2014. |
| hour in the eastern direction and 1766 in the western direction during peak hours. He wanted to know why there is such a | | | The addendum states that the recommend mitigation measures will be sufficient in dealing with the traffic impacts brought by the proposed |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| fundamental difference between the two reports. He stated that according to Goba Engineering, no traffic accounts were done for Shelley Avenue and no counts were done at King David School and Bedford Road. Ove Arup engineers did the counts crossing Bedford Street; they counted 1781 vehicles per hour in the afternoon in 2005. According to the current report only 1050m of Club Street will be broadened the rest of it is only worth being broadened when Louis Botha is upgraded into four lanes. He wanted to know on whose/ what authority is the report saying the upgrade on Louis Botha is going to happen and how is it going to happen. He also wanted to know about what is going to happen to the people on the other side of Bedford Road. He wanted to know what the GDP has to do with the growth in traffic. He stated that the report did not consider the developments that have happened in 2011. | | | development. |
| Mr Kruger stated that the traffic study was conducted in 2012 and there are other developments that happened after that such as e- tolls and residential developments and wanted to know if it is possible to re-do the traffic study as the TIA is out-dated. | Steven Kruger | 26/02/2014 Public Meeting | The EIA takes into account the cumulative impacts and does not only focus on the impacts on site. The traffic issues have been captured and will be addressed in the other focus group meeting with the traffic engineers. |
| The TIA needs to be completely re-done as the circumstances have changed drastically. He stated that Orange Grove has always been side-lined and they are the ones affected the most due to the new developments (BRT) and E-tolls. He said they (community) do not want 4 lanes in the central parts with only two lanes going into Louis Botha Avenue as this is going to create more traffic issues for them. He stated that he totally opposes the degradation of natural habitats. | Roger Chadwick | 26/02/2014 Public Meeting | Furthermore, the TIA report has been updated with a recent survey considers all the factors that the residents are concerned about. The report of the update study is attached as addendum, to the TIA report. The addendum was produced in August 2014 and it highlights the rate of traffic changes that have taken place during the period between 2012 and 2014. The addendum states that the recommend mitigation measures will be sufficient in dealing with the traffic impacts brought by the proposed development. |
| 0 | Concerns with regards to pr | essure on Service Infrastruct | ure |
| Ms Newstadt is concerned about the sewage system, she states that it is already problematic around the proposed development site and thinks that the proposed development will aggravate it. | Wendy Newstadt | 28/03/2014 by email | The CoJ has confirmed the capacity to provide services to the proposed development. For all the failing systems (sewer and water), the municipality needs to consider the upgrades as some of the systems are very old and due for upgrade. Connections to be made |
| Mr Berry is concerned about the sewage infrastructure. He is also concerned about the impact on electricity supply or load shedding. | Damon Berry | 27/03/2014 by email | will be in line with the CoJ standards to ensure that the systems operate properly. |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| Mrs Francis feels that the proposed developments will put additional pressure on electricity, water supply and water pressure, sewerage and road maintenance. She adds that there is already densification of properties in Senderwood which has placed pressure on resources. | Dulcie Francis | 27/03/2014 by email | The energy problem is a national challenge in South Africa which is being dealt with by Eskom through the construction of the new power stations. Since there is a long term solution to the national challenge of power supply, load shading will be solved and the proposed project will have no significant impact in terms of that. |
| Ms Laserson is concerned that the proposed development will exacerbate the faulty sewage system. | Marian Laserson | 25/03/2014 by email | |
| Ms Laserson also stated that sewer system is very old and asked if the condition of this sewer system has been inspected. She said the point where the yellow line disappears in the North on the Bulk Services Map is actually the Sizwe property and that there is usually bad sewage spills and that the proposed development will add up to the faulty sewage system. She wanted to know from which point the power-line cables will be installed and if they are going to be tunnelled. She said that the pylons bringing cables from Calvin Power Station are bringing in 88KV cables and wanted to know how this was going to be converted to 11KV and wanted to know where the substation is going to be. | Ms Marian Laserson | 26/02/2014 Public Meeting | There are confirmation letters in the report from the CoJ and Johannesburg Water which states that this proposed sewer connection which is in the engineering report is relevant and implementable, and that the project's focus is mainly on the development site and Sizwe falls outside of the boundaries of the development site. The cables are going to be pipe-jacked underneath the ground and will be installed from the Alexandra Substation. It would be a new underground 11KV which is going to link into the Alexandra Substation. |
| Ms Laserson stated that she has realised for some time that confirmation letters from the various agencies of the Johannesburg Council regarding availability of services is highly questionable. Often these are produced by Heads of Departments who do not have the necessary qualifications to understand the issues. Most of these departments and agencies are understaffed with qualified personnel. There is a tendency of the officials to tow the political line and approve issues, without fully understanding the consequences. They do impose conditions in these letters, but these conditions are often ignored by the developers and there is no proper law enforcement to make the developers comply. One example of poor understanding is the statement that the electrical supply will be "attached to the Club Street Extension bridge." This is a grave mistake. Anyone who has been down to this bridge will notice that the ramparts are being seriously eroded by water. It is a matter of time before the bridge will have to be repaired, if, with luck, it is not washed away completely. | Marian Laserson | 25/03/2014 by email | Comment noted. |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| Mr Eleftheriades wanted to know if the municipality or the developer is committed to pay for the electricity connection, and who will be committed to bringing services to the site | Christos Eleftheriades | 26/02/2014 Public Meeting | The developer is committed to bringing services to the site, and the development is the joint consortium of Standard Bank, Investec Property and Global Capital. |
| With regards to the sewer system he stated that he feels that the proposed development will add up to the faulty sewage system of the greater area. This is why they invited people from other areas to attend the meeting. He also said that they are going to ensure that the development does not create more problems for them. | | | All bulk infrastructure that forms part of the development is the responsibility of the developer, pending the confirmation from the CoJ. |
| He said that there would be a substation close to a 110/88 KV and it will be converted into an 11KV line which will be pipe-jacked. The developer will be responsible for the provision of the bulk services | | | |
| Mr Wallace stated that the degradation of the sewer system should be looked at. | D. Wallace | 26/02/2014 Public Meeting | The sewage spills are outside the development boundaries and will be addressed with Johannesburg Water to see if they have a plan in place. |
| Ms Wijtenburg stated that there is very little thinking in new developments and the CoJ should be taking new sources of energy such as solar systems and feeding them into the existing systems. She stated that there is little creative and innovative thinking, the reality is that everything that affects this community requires a different set of answers, developers should be coming up with innovative ways and new specifications instead of old ones. | Marisa Wijtenburg | 26/02/2014 Public Meeting | Comment noted |
| Qu | uestions and concerns with | regards to Commercial Activ | ities |
| Mr Wolder feels the community is already over traded and do not need any more commercial development, he also adds that concrete on the land is a no go. | Ray Wolder | 26/03/2014 by email | Comment noted |
| Mr Stillerman feels that retail development is unnecessary and will have negative impacts which are not possible to mitigate. | Eric Stillerman | 14/03/2014 by email | Comment noted |
| Mrs Francis raises that there are shopping centres within a 2 km radius at Linksfield Square Shopping Centre, Linksfield Terrace Shopping Centre as well as shops at Senderwood, Sandringham and Elm Street in Dowerglen. She adds that there are also major shopping centres at Balfour Park, Greenstone, Norwood Mall, Eastgate and Bedford Centre. She feels that they do not need more shops or restaurants as there is an over-supply in the area. | Dulcie Francis | 27/03/2014 by email | Comment noted |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| Ms Carroll says that there are shopping centres within a 2 km radius at Linksfield Square Shopping Centre, Linksfield Terrace Shopping Centre as well as shops at Senderwood, Sandringham and Elm Street in Dowerglen. There are major shopping centres at Balfour Park, Greenstone, Norwood Mall, Eastgate and Bedford Centre. The area is already well served with restaurants. There is no justification for duplicating branches of chain stores in another (unnecessary) shopping centre. | Wendy Carroll | 27/03/2014 by email | Comment noted |
| Mr Fuchs said there is no need for more commercial spaces as there are 11 shopping centres within a 5 km radius and 5 shopping centres within a 2 km radius, and that the HIA is not relevant. | Daryl Fuchs | 26/02/2014 Public Meeting | According to legislation SEF is required to conduct a HIA. |
| Mr Rambari stated that he would like to see the market research that recommends additional commercial spaces. | Strike Rambari | 26/02/2014 Public Meeting | Comment noted- |
| Ms Laserson stated that certainly the need and desirability of another shopping centre is highly questionable, since there are too many shopping centres in the vicinity already. It is noted that scant mention is made of the shopping centre on Linksfield Road, just off the N3 Highway, a distance of 500 m from the proposed development. | Marian Laserson | 25/03/2014 by email | Comment noted |
| For the record this development entails 8 400 "affordable" dwellings of which 4 000 are proposed as single family dwellings (houses), the rest being flats in 3 to 6 storey blocks, 2 schools, a shopping centre, a youth centre, 2 etc. The ground (171ha) is owned by the Government and is under the control of Gauteng Province. | | | |
| There is a proposal to develop another shopping centre on the east side of the M3, off Linksfield Road, in Ekurhuleni. | | | |
| She continues to say that the statement that there are 24 schools in the area is deliberately misleading. A number of these are private, specialist schools (religion- or culturally- specific.) Certainly the assertion that these schools are within 5 minutes' drive of the site is laughable. It was laughable in 2005 when Fernridge did the feasibility study, and it is even more ludicrous now. Traffic on Club Street at 14:00 (2p.m.) now takes 20 to 30 minutes to travel less. | | | |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| | SOCIAL ENVIRONMEN | T & GENERAL CONCERNS | |
| | Concerns with re | gards to Public Health | |
| Ms Assimacopoulos noted that she has read about the anthrax but no other communicable diseases. | Alys Assimacopoulos | 10/03/2014 by email | Comment noted- A specialist study was conducted regarding the anthrax and is included in the report. |
| Concerns with rega | ards to the Environmental A | pplication Process (including | Public Participation) |
| Mr Druker feels that the legal requirements were not followed on the application and that he is missing some pages in the report that he has received. Mr Druker feels that the NEMA Principles were not applied correctly on the matter. Mr Druker says that the report fails to address the no development alternative. Additionally, he feels that the open space should be used for sporting events and for the benefit of the community. | Raymond Druker | 28 March 2014 by email & fax | SEF has undertaken the EIA in terms of the 2010 EIA Regulations of NEMA (Government Notice R.543). The documents provided to the GDARD and all the stakeholders contained all the information required in terms of the regulations and as requested by the GDARD. All the reports submitted to the GDARD and the stakeholders did present the no development alternative as required by the regulations. |
| Ms Laserson raised that if HIA is conducted due to legislative requirements then why the HIA does not include other surrounding properties since it was concerned with buildings which are not on the property in question. | Marian Laserson | 25 March 2014 by email | Comment noted. The applicable legislation requires for the HIA specialist to assess the heritage impacts within the site boundary of the proposed site. |
| Mr Fuchs wanted to know why the developer can't do a project that only needs a Basic Assessment (BA), resize and redesign the project so that it only requires the BA instead of the Scoping EIR. | Daryl Fuchs | 26/02/2014 Public Meeting | The regulation determines which process needs to be followed and the BA does not necessarily mean that the size of the development is small. One can have a small development which could have significant impacts and require a Scoping EIR. |
| Mr Rambari stated that the legal requirements are not in the report and would like to see the legal requirements that were looked at. He wanted to know if it's purely restricted to NEMA. He commented that the CoJ's policy of the identification and combating of urban sprawl is different from that of Huddle Park. He wanted to see an investigation of no-go zones in the report and wanted to know if research has been done concerning the benefits of the public open space to a city. | Strike Rambari | 26/02/2014 Public Meeting | Legal requirements are presented in Section A-2 of the EIR. The wetland was identified as the no-go zone for the development and a 32m buffer zone was established. The development will reduce the public open space by only approximately 28.8% |
| Ms Laserson stated that this proposed project is known to the EAP, SEF, and to the developer, Huddle Investments (Pty) Ltd. In fact, the developer's Town Planner has commented unfavourably on the proposed Linksfield Mixed Use Development, in their Final Scoping Report. So why has this not been considered anywhere in the Draft EIR? She adds that the only report in the Draft EIR dealing with the need for the proposed type of housing is not convincing regarding | Marian Laserson | 27/03/2014 by email | SEF, as an independent EAP followed all the required stages of the environmental process underway. Public participation is undertaken primarily to provide the stakeholders with an opportunity to provide comments or concerns about the proposed development. The information presented by all the specialist reports included in the EIR presents the current state of the site. The specialists made |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| this. The statement that the schools favour the development for housing for their staff is misleading. Most of their staff will not be able to afford the proposed type of housing and the few teachers or senior administrative staff members, who may be able to afford this type of housing, are insufficient to warrant a whole development as envisaged. | | | recommendations to address all the concern regarding the possible impacts. Due to the nature of the proposed development, the activities will not result in significant pollution. Hence undertaking the Air Quality Study was unnecessary. So all the studies that were undertaken were crucial studies that were done for the purpose of providing the information |
| Ms Laserson stated that Specific Specialists Reports will be unnecessary if the Public Protector overturns the tender methods in the purchase of the property. Thus I will not deal in any detail in these reports, with a few exceptions: (not necessarily in order of importance): • Visual Impact Assessment – Appendix 6b: The report is dated | | | that is critically needed. |
| January 2013 and the report of dense vegetation restricting one's view of Huddle Park is now incorrect. Since the other two-thirds of Huddle Park were leased and rehabilitated as sports and recreation, the excessive vegetation has been cleared, the property has been cleaned up, they are again playing golf at Huddle, walking dogs, etc. and the general | | | |
| public are absolutely delighted with it. Also no mention is made of the destruction of the view from the Ridge, other than from the Harvey Nature Reserve. This is a serious oversight. I cannot agree with the statement "The significance of the impact caused by the proposed development and associated upgrades without mitigation is therefore regarded to be medium. Implementation of | | | |
| appropriate mitigation measures (as discussed in Section 7.2.1) will decrease the significance of the impact to low- medium." This is purely subjective. The impact of the development will be high, even with mitigation. It represents the loss of Public Open Space! It represents more traffic, noise, loss of views, probably air pollution, strain on old and | | | |
| degrading services, etc. Also, any lighting will be intrusive at night because there is none at present. Unnecessary comments on issues not on the property: The entire Heritage Report is a sham because none of the buildings referred to are on the property in question. The excuse that NEMA requires a heritage 4 report makes no sense if the report is for buildings and structures NOT on the property. | | | |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| The Traffic Report is being dealt with by other I&APs so I will be brief: The current Traffic report is out of date, especially in view of the fact that traffic patterns have changed dramatically since the E-tolls were opened. There is no mention of the intended Rea Vaya or BRT plans within the foreseeable the future. I also query the statement that there are excellent east west routes in the area. This is not the case and a good traffic survey would show this. I have already dealt with the outdated feasibility study conducted in 2005 by Fernridge, wherein there is a map showing travelling time according to specific facilities. These figures were absurd in 2005, except perhaps at 3 a.m., and they are even more absurd now. | | | |
| The Noise Impact – Appendix 6c: Ambient noise levels were measured on 4th and 6th December 2012. This is ridiculous. Both of these days were during the school holidays, which is obviously absurd since the main traffic occurs during school term. Of the 4 points where the Noise Impact testing was conducted, two positions are some distance from the site. This makes no sense. It should be noted that it is a mistake to locate ANY housing on the south west of the site because this is right on the golf course and close to the existing club house. By the very nature of a golf club house, there will be functions which could be noisy. This would create unnecessary conflict between the golf course and residents. As for the proposal to put a solid wall all around the proposed | | | |
| development – whether for noise control or security or any other reason,- is totally unacceptable. The view from Club Street will be totally destroyed and traffic noise will be echoed and exacerbated. | | | |
| There is no air quality study: In 2007 an air quality study commissioned by HEAD League showed that the air quality was questionable on Huddle Park, despite the fact that it is an undeveloped area. With another 450 dwellings and a shopping centre proposed, what will this do to the air quality on the site? This represents a great deal of extra car emissions from the development alone. | | | |
| | General – Concerns related | I to the Purchasing of the Lar | nd |
| Mr Druker feels that the site on which the development is proposed to take place was not sold legally. He raises that investigation is to be done and that the Public Protector is made aware of the issue. | Raymond Druker | 28/03/2014 by email & fax | Comment noted |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| Mrs Francis states that the Public Protector is investigating the alleged irregular sale of 53 hectares of public open space and redevelopment of a portion of Huddle Park. | Dulcie Francis | 27/03/2014 by email | Comment noted |
| Ms Carroll raises that the Public Protector is currently investigating the alleged irregular sale of 53 hectares of public open space and redevelopment of a portion of Huddle Park. The sale could be considered illegal. | Wendy Carroll | 27/03/2014 by email | Comment noted |
| Ms Laserson talks about the query with the Public Protector: Since the issue of whether the tender process for the purchase of this property from the CoJ is legal is still being considered by the Public Protector, the whole Draft Environmental Impact is premature and any further comments may be totally unnecessary. The Public Protector's office has informed us that they still await a valuation on the 53 hectares. She added that she has many more criticisms of the Draft EIR but she awaits the decision of the Public Protector before spending any more time on this project. | Marian Laserson | 27/03/2014 by email | Comment noted |
| | G | eneral | |
| Mr Druker is concerned about the development and pleads that the responsible authority to look at the matter cautiously. | Raymond Druker | 28/03/2014 by email & fax | Comment noted |
| Ms Assimacopoulos said that she was interested to read about the alternative plan and would like to know what that means. | Alys Assimacopoulos | 10/03/2014 by email | An alternative plan would be a plan that would be utilised if the original plan was not to be implemented. |
| Mrs Francis is concerned that the proposed Huddle development and Sizwe development will have a negative effect on the noise levels and human landscape of north-eastern part and Ekurhuleni. | Dulcie Francis | 27/03/2014 by email | Comment noted. In the EIR it is highlighted that the proposed development is in line with the Regional Spatial Development Framework (RSDF) of Region E of the CoJ. This means that the proposed development is in line with the plans of the CoJ. On the development of the RSDF, the regional impacts should have been considered. |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| Ms Carroll is concerned that the proposed Huddle development has not considered the impact on the proposed mixed use development at Sizwe, Rietfontein which is in close proximity. She adds that, a "no development alternative" has never been explored. There is a strong demand for a green lung and green corridor from residents of surrounding suburbs as well as residents of Alexandra, Edenvale, Bedfordview and Germiston. The Gemmil Park sports fields are utilised fully and the proposed development reduces public open space by a further 53 hectares. It is not in keeping with the CoJ Open Space Legislation. Huddle Park's unique character and cultural assets have been disregarded. She added that the so-called Linksfield Mixed Use Development on the east of Club Street Extension will have significant impact on the whole area. | Wendy Carroll | 27/03/2014 by email | Cumulative impacts were assessment and resented in the EIR, and therefore the impacts of other development in the area have been considered. In the EIR it is highlighted that the proposed development is in line with the Regional Spatial Development Framework (RSDF) of Region E of the CoJ. This means that the proposed development is in line with the plans of the CoJ. On the development of the RSDF, the regional impacts should have been considered. It must be noted that other developments are approved individually and the negative impacts caused by the developments are not the responsibility of this development to address. However, contribution of this development to such impacts may be prevented. All the reports submitted to the GDARD and the stakeholders did present the no development alternative as required by the regulations. |
| Ms Assimacopoulos indicated that, unfortunately, she would not be available for the 26th Feb meeting and requested that a copy of the minutes be made available to her. | Alys Assimacopoulos | 29 /01/2014 by email | We have noted your request and will ensure that you receive the minutes of the meeting. |
| Mr Mogane requested that a locality map be forwarded to her in order to determine whether any provincial transport infrastructure is affected or not. | Maurice C. Mogane | 31/01/2014 by email | The requested information was forwarded and a CD copy of the report was sent to Mr Mogane. |
| Mr Mogane indicated that the development is not directly affected by any provincial roads. However, going forward there may be traffic issues to be attended to with regards to provincial Road K60 (Linksfield Road) to the north east of the proposed development. | | 29/01/2014 by email | Comment noted, thank you. |
| Mr Fuchs wanted to know what was meant by operational activities. He wanted to know if all the comments go into the Final EIR, he stated that his comments for the Draft EIR were heavily abridged. | Daryl Fuchs | 26/02/2014 Public Meeting | The operational phase of the project is the phase after the construction phase and the activities of the operational phase include maintenance. |
| He asked who the competent authorities are and requested a list of the competent authorities.He stated that he would like to be around when the specialists are conducting their studies. He wanted to know if the people who are staying on the ridge and on the hill were included in the VIA and what the results were of the survey.He expressed his concern about the residential 2 being too close to | | | Comments will be summarised in the Comments and Response Report. Comments are captured and the response is given to each comment. Original comments will also be attached to the final EIR which will be submitted to the GDARD for approval. The Gauteng Department of Agriculture and Rural Development (GDARD) is the competent authority for the environmental authorisation and the Department of Water Affairs (DWA) for the water use license (WUL). There are other commenting authorities such as |
| the clubhouse, and seconded the other commenters about the economic value of the golf course. | | | Johannesburg Water and City Power. |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| Mr Eleftheriades stated that the proposed meeting should focus on the traffic and wetland studies. | Christos Eleftheriades | 26/02/2014 Public Meeting | Comment noted |
| Ms Laserson stated that the aerial images are out-dated as there are other developments that are not shown on the maps. | Marian Laserson | 26/02/2014 Public Meeting | Comment noted. Please note that the aim of the locality maps is to indicate the location of the site. Information presented in the maps is the information obtained by the specialists on their site visits. |
| Mr Rambari wanted to know where the labourers would come from. He proposed for labourers to be from the local area and that the local citizens should be given notice on time, the adverts should be clear and on time. | Strike Rambari | 26/02/2014 Public Meeting | It is important for the developer to work closely with the ward councillors to identify the people that are skilled, qualified and willing to provide labour. SEF shall recommend for the developer to hire people from the local area before the tenders go out. |
| She wanted to know who the company was that designed the layout of this development. The follow-up question was, why the Cape Town planners were designing developments in Johannesburg and why they placed low cost houses close to their expensive houses. | Economacos | 26/02/2014 Public Meeting | The planners from Cape Town are the ones that designed the layout. The proposed development is not going to be low cost houses but will cater to medium to high income categories. |
| She stated that there is a lot of unemployment and poverty in South Africa and that the residents cannot carry on trying to separate themselves from that. She stated that the residents should rather upgrade their facilities that way they will not feel threatened by new developments. | Marisa Wijtenburg | 26/02/2014 Public Meeting | Comment noted |
| This department is of the opinion that looking at the nature of the proposed activity, potential impacts on the surrounding socio- economic environment and the proposed mitigation measures, the report may be accepted for positive consideration. | Linda Kuhn | 26/02/2014 Public Meeting | Comment noted. All the recommendations will be taken into consideration. |
| | • Adn | ninistrative Requests | |
| Mr Fuchs wanted to know why were there only a few people who attended the meeting, and stated that he had forgotten about the meeting and it would be nice if SEF would send the reminder 3 days before the meeting. | Daryl Fuchs | 26/02/2014 Public Meeting | Mr Fuchs was asked, at the meeting, to retract the comment that he emailed earlier stating that he was not informed of the meeting and that the meeting was illegitimate. |
| Mr Eleftheriades said would like to have more information on the development and that the developer should update them on the progress of the development and on any move the developer makes particularly with David Bagg (of the Huddle Golf Course). He also stated that they have been objecting to developments and they will keep on objecting if they feel that the development is going to harm the success and growth and wellbeing of the golf course. | Christos Eleftheriades | 26/02/2014 Public Meeting | The developer does not have any formal agreements with Mr Bagg but is willing to answer any queries with regards to the development. |
| Mr Bagg said that the community has re-developed the golf course at their own expense and that the golf course needs to be sustainable and there should be a symbiotic relationship between the developer and the community. | David Bagg | 26/02/2014 Public Meeting | Comment noted |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| Ms Laserson requested a direct email address for GDARD so that she could send her comments on the Draft EIR directly to GDARD. | Marian Laserson | 27/03/2014 | The email address was provided. |

Table 5: Comments and Responses – FOLLOW-UP CLARIFICATION MEETING (13 November 2014)

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| | Issues Rela | ted to Wetlands | |
| Enquired if the wetland will not be impacted. | Ms Marian Laserson | 13/11/2014 Clarification meeting | The system is very small and there are recharge areas that will sustain the wetland. |
| The CoJ maps show that there are two seepage areas within the development area. | | | During the wetland survey, there were no seepages that were identified in that area, however, it is not known by the wetland |
| She stated that she found that the contours of the golf course area have changed from what they were 78 years ago. It is likely that there has been pollution on the wetland from fertilisers used. | | | specialist (Piet-Louis Grundling) as to who did the survey for the CoJ and he cannot comment on that. The area is covered in Kikuyu grass, so it's possible that there could be local seeps. If such areas are discovered during construction it should be incorporated into the development (i.e. part of the garden of the dwelling). |
| Enquiry for clarity on the scales/rates (impact rating) allocated to different aspects of the wetland. | Cllr K. Steven | 13/11/2014 Clarification meeting | An explanation of the scales of the wetland ratings which are based on its transformation was provided. The information was extracted from the WIA and summarised in the table presented in the presentation and minutes of the meeting. |
| Enquired about what river flowed into the wetland, he wanted to know whether it was the Jukskei River | Mr L. Battani | 13/11/2014 Clarification meeting | It was stated that it was a tributary. (Note: water from the wetland flows into an unnamed tributary of the Jukskei River). |
| Enquiry about the impact that mining activities in Johannesburg have had on the catchment, he has seen fish dying in the river that runs close to his property. | | | There are a lot of activities that may affect the catchment and it would be difficult to isolate impacts of one activity. The Jukskei River, however, doesn't enter this system, it's an isolated catchment. |
| | | | The wetland specialist suggested that a community committee be established to monitor impacts on the catchment and both the developers and residents should be able to report to this committee. |
| Stated that the impact seems less since the golf course was upgraded. | | | The golf course area has reduced, so one would expect nutrient loads to reduce as a result. |
| Queried if there is a pollution control plan to prevent impacts from the fertilisers and other hazardous chemicals to be used in the development. | Mr Andrew Barker | 13/11/2014 Clarification meeting | Such issues are addressed in the Environmental Management Programme Report (EMPr) document that forms part of the Final EIR. It will be recommended that measures included in the EMPr be part of the conditions in the environmental authorisation. |
| He indicated that he is happy that there would be such conditions. Such management issues are very crucial at this stage. | Mr Andrew Barker | 13/11/2014 Clarification meeting | Comment noted |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE |
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| | AFFECTED PARTY | COMMUNICATION | |
| | Issues Re | lated to Traffic | |
| She stated that the weekend during which the counts were done was a long weekend (as the 16th of June is a public holiday) and therefore many people went on holiday on the Friday of that particular weekend. | Ms Marian Laserson | 13/11/2014 Clarification meeting | It was clarified that people going on holiday on Friday meant that more traffic would be expected on that Friday, because he would expect more traffic on a Friday before a long weekend. |
| Traffic wouldn't really be higher, but traffic would be less than that of a normal Friday. | | | The counting was done for the whole day from 06h00 to 18h00 on Friday (13 June) and from 10h00 to 14h00 on Saturday (date confirmed as 21 June). The main findings of the study were that along Club Street and Civin Drive (in the north-south direction) as well as on Linksfield Road (which links to the freeway), there was a 25-30% increase in traffic rate when compared to the findings of 2011. Traffic rates in some parts of Club Street were 20-25% lower than those obtained in 2011. |
| Stated that the drainage is not good on Club Street (in the vicinity of St Andrews Street intersection). When it rains, there is a huge amount of stormwater that stands at the entrance to the school and the golf course. It disturbs traffic on Club Street. | | | Information noted. |
| The intersection of Civin Drive with Club Street and Linksfield Road is located within the Ekurhuleni Municipality, not in City of Johannesburg Municipality (CoJ). She asked AB to confirm it. | | | The traffic engineer (Adrian Brislin) assured Ms Laserson that the intersection is located within the CoJ and that the JRA is responsible for it. He added that he was aware that the border separating the two municipalities was very close. |
| Noted that on three of the left turns there are swift lanes included, but not on the fourth; so he wanted to know whether there was a reason for this and whether it should not be a consideration. | Mr Andrew Barker | 13/11/2014 Clarification meeting | This was considered, but the challenge is that the Saheti School is situated on that corner and it would be difficult to implement an additional swift lane without expropriation of a portion of that land. Expropriation may, however, be considered for long term planning. The development of the Linksfield node on the opposite corner should also be considered as they may wish to implement a grade separated intersection (i.e., interchange) at Linksfield Road. |
| Expressed his concerns about two access points on the northern part of Club Street which have no signals. It is going to make it difficult for people to join Club Street from those points, and result in more accidents. | Mr Farrel Osher | 13/11/2014 Clarification meeting | The intersections were tested and the results showed that the traffic volumes are not high enough to signalise these intersections. The Johannesburg Road Agency (JRA) would not approve installation signals in such intersections. |
| Asked on which dates the previous counting was undertaken. He raised his concern on the traffic counts being undertaken on different days as this would result in making incorrect conclusions. | | | The variation between one day and another can be between 5% and 10%. The observed rates can vary from one day to another as it is possible from one year to another. |
| Stated that he is not happy with the TIA study being only restricted to the vicinity of the development, while the development impacts on the entire area of Huddle Park. | Mr Farrel Osher | 13/11/2014 Clarification meeting | The study is undertaken as per the TIA guidelines which includes, amongst other things, that where a development will result in an impact greater than 3%, a TIA should be undertaken. |

| COMMENT RAISED | INTERESTED AND AFFECTED PARTY | DATE & METHOD OF COMMUNICATION | RESPONSE | | |
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| Queried why traffic calming and yield signs were not considered on Club Street to slow the traffic in order to make it easier to join Club Street at the intersections. | Mr Daryl Fuchs | 13/11/2014 Clarification meeting | According the road classifications in terms of the road hierarchy, it is not feasible to put traffic calming measures on Club Street because it is of a higher class. If traffic calming and yield signs or stop signs were to be used, there would not be enough gaps for the traffic to join Club Street at the intersections. | | |
| | General | | | | |
| The issue of rushing through with the finalisation of the public participation process by consultants is always a cause of concern. This is based on the fact that during the December holidays, most people will be away and therefore participation will be limited. | Mr Andrew Barker | 13/11/2014 Clarification meeting | The regulations prohibit conducting public participation between 15 December and 05 January. Therefore, the period between those dates will be excluded from the public participation. | | |
| It was asked what GDARD stands for. | Residents | 13/11/2014 Clarification meeting | GDARD stands for Gauteng Department of Agriculture and Rural Development | | |