

WATER USE LICENCE APPLICATION TECHNICAL REPORT

FOR THE DEVELOPMENT OF VEHICLE DEALERSHIPS AND
FACILITIES INCLUDING A BOREHOLE AND CONSERVANCY
TANK ON PORTION 168 AND 59 OF THE FARM
BULTFONTEIN 533 JQ

Comment Period: 14 October 2020 to 13 November 2020

Proponent:

4 Wheel Drive Property Holdings (Pty) Ltd.

Project Reference:

21860- Ptn 59 Bultfontein 533

Report Date:

October 2020




Report Reference:

21860-WULA-1

DOCUMENT CONTROL

Project Name	Proposed Development of Vehicle Dealerships and Facilities including a borehole and conservancy tank on Portion 59 and 168 of the Farm Bultfontein 533 JQ
Report Title	WULA Technical Report
Authority Reference Number	GAUT 002/20-21/E2591
Report Status	For Public Comment

Applicant Name	4 Wheel Drive Property Holdings (Pty) Ltd
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DOCUMENT PROGRESS

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14/10/2020	21860-WULA-1	SAHRA and PHR-G	PDF upload to SAHRIS

Amendments on Document

Date	Report Reference Number		Description of Amendment
09/10/2020	21860-WULA-0	21860-WULA-1	Minor amendments; Finalise report

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1 INTRODUCTION

1.1 Project Description

4 Wheel Drive Property Holdings (Pty) Ltd proposes to develop and operate facilities for showing, servicing, rental, parking, washing, preparation and administration of vehicles on Portion 59 and Portion 168 of the Farm Bultfontein 533 JQ. The relevant services, roads and complementary uses will also be put in place. Sufficient parking will be provided and the site will be landscaped with indigenous trees, shrubs and plants. In addition, a borehole will be used to supplement municipal water supply. Grey water recycling from vehicle wash bays will take place and sewer will be stored in a conservancy tank and collected weekly. It should be noted that a separate Environmental Authorisation (EA) process was Portion 168 and EA issued on 6 August 2018 (GAUT: 002/17-18/E2160). However, after further investigations into the need for and desirability of the area, 4 Wheel Drive Property Holdings (Pty) Ltd. decided to purchase Portion 59 as additional space was required and needed for access to Portion 168. This WULA process includes activities occurring on both Portion 168 (authorised) and Portion 59 (BAR process currently ongoing).

Due to required abstraction as well as the disposal of the sewage to several conservancy tanks, a number of activities in terms of Section 21 of the National Water Act (NWA) (Act No. 36 of 1998). These include:

- 21(a): taking of water from a water resource; and
- 21(g): disposal of waste in a manner that may detrimentally impact on a water resource.

Prism Environmental Management Services (Prism EMS) has been appointed to undertake the requisite Water Use Licence Application (WULA) process.

1.2 Project Location

The proposed development occurs on Portion 59 and 168 of the Farm Bultfontein 533 JQ. **Table 1-1** provides an overview of property details together the Surveyor General 21-digit diagram number. The sewer conservancy tank for both properties is also located on Portion 168. An overview of the locality is provided in Figure 1-1 and Figure 1-2.

Table 1-1: Property Details

21-digit code	Property Description	Coordinates
T0JQ00000000053300059	Portion 59 of the Farm Bultfontein 533 JQ	25°57'54.62"S; 27°55'27.68"E
T0JQ00000000053300168	Portion 168 of the Farm Bultfontein 533 JQ	25°57'55.06"S; 27°55'23.45"E

From a catchment perspective, the development occurs in Quaternary catchment area A21E and is part of Limpopo Water Management Area. Figure 1-1 and Figure 1-2 provide the locality map and aerial locality map respectively.

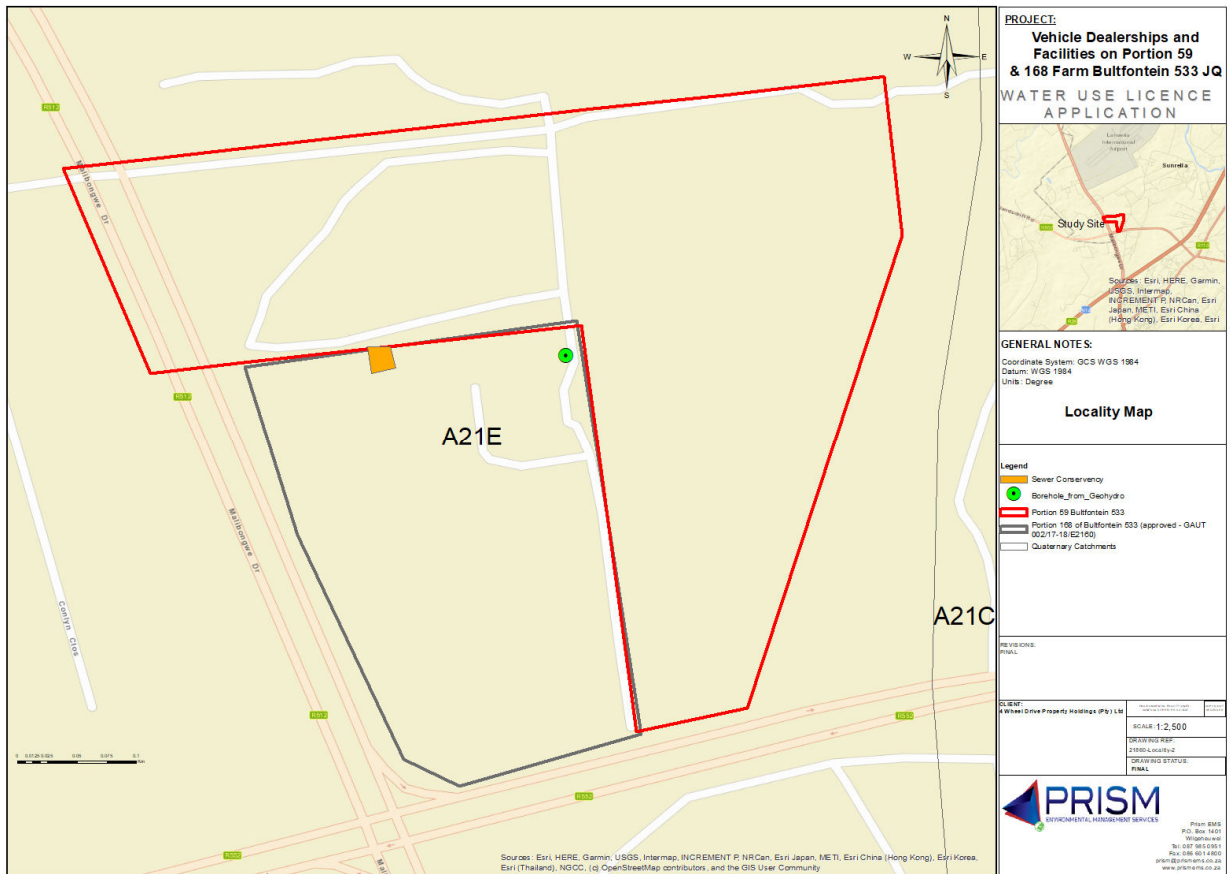


Figure 1-1: Locality Map

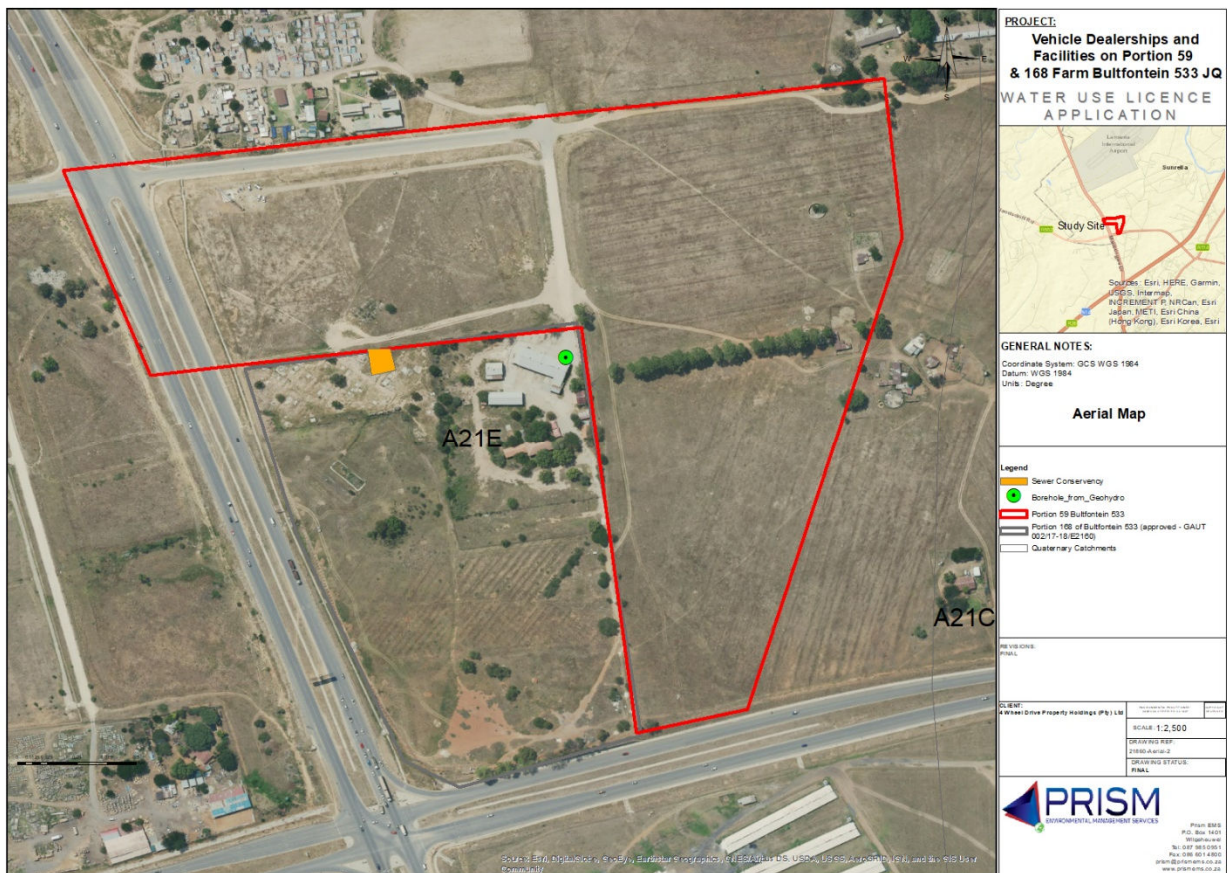


Figure 1-2: Aerial Locality Map

1.3 Contact Details

The applicant is the entity that will assume responsibilities as the holder of the WUL if granted. Details of the applicant is contained in Table 1-2.

Table 1-2.: Details of the Applicant.

Applicant:	4 Wheel Drive Property Holdings (Pty) Ltd
Contact Person:	Matt Steyn

2 DETAILS OF ASSESSOR AND SPECIALISTS

Prism EMS have been appointed to undertake the required Water Use Authorisation Process in terms of the Section 21 of the National Water Act (Act No. 36 of 1998) (NWA) for the aforementioned project. Details of the Environmental Assessment Practitioner are provided in Table 2-1 and the relevant Curriculum Vitae are appended in **Annexure 10.1**.

Table 2-1.: Details of the Assessor

Assessor:	Vanessa Stippel
Company:	Prism Environmental Management Services
Qualifications:	MSc. Ecology, Environment and Conservation
Experience:	9 years
Affiliation/ Registration	Professional Member of Southern African Institute of Ecologists and Environmental Scientists SACNASP Pr.Sci.Nat. (116221) Registered EAP (2019/175)
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Email:	vanessa@prismems.co.za

Designation	Name	Qualification	Professional Registration	Specialist Assessment
Prism EMS Team				
Contact Details	Post: PO Box 1401, Wilgeheuwel, Johannesburg, 1736		Tel: 087 985 0951 Fax: 086 601 4800 Email: prism@prismems.co.za www.prismems.co.za	
Project Director	De Wet Botha	MA. Environmental Management (PHED) 17 years' experience	South African Council for Natural Scientific Professions (SACNASP) registered Scientist Pr.Sci.Nat. (119979)	Project Management and Report Review, Wetland Specialist

			<p>Registered Member of Environmental Assessment Practitioners Association of South Africa (EAPASA) (2019/1209)</p> <p>Member of the International Association for Impact Assessors (IAIASa) (1653)</p> <p>Member of the Gauteng Wetland Forum</p> <p>Member of the South African Wetland Society</p>	
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3 REPORT OUTLINE AND REQUIREMENTS

On the 24 March 2017, the Regulations regarding the Procedural Requirements for Water Use License Applications and Appeals (R. 267 of 24 March 2017) were published and came into effect. These Regulations define the Water Use Licence Application Technical Report as follows:

“Water use Licence Application Technical Report includes water use registration forms, public participation material and specialist studies.”

This report aims to provide all the necessary information related to the water uses detailed in the various water use licence forms. In addition, the appendices of this report include all the necessary additional information required for the processing of this application. A checklist has been provided as part of the Executive Summary and is aligned to the checklists contained in the R.267 of 24 March 2017.

4 LEGAL FRAMEWORK

4.1 National Environmental Management Act (NEMA) (Act No 107 of 1998)

The NEMA is the umbrella framework for all environmental legislation primarily to assist with implementing the environmental rights of the Constitution. The NEMA provides fundamental principles required for environmental decision making and to achieve sustainable development. It also makes provision for duty of care to prevent, control and rehabilitate the effects of significant pollution and environmental degradation, and prosecute environmental crimes. These principles must be adhered to and taken into consideration during the impact assessment phase.

NEMA defines “environment” as –

“the surroundings within which humans exist and that are made up of –

- (i) the land, water and atmosphere of the earth;*
- (ii) micro-organisms, plants and animal life;*
- (iii) any part or combination of (i) or (ii) and the interrelationship among and between them; and*
- (iv) the physical, chemical, aesthetic and cultural, properties and conditions of the foregoing that influence human health and well-being.”*

Section 24D and 24(2) of the NEMA makes provision for the publication of list and associated regulations containing activities identified that may not commence without obtaining prior environmental authorisation from the competent authority. These regulations are referred to as the EIA Regulations and are interpreted hand in hand with the various listed activities discussed further below.

4.1.1 Environmental Impact Assessment Regulations, 2014 (GN R 982 of 4 December 2014)

The EIA regulations were promulgated in terms of Section 24 of the NEMA, for the purpose of providing methodologies and specific requirements for the undertaking of an EIA. The Regulations stipulate that any proposed activity listed in the associated notices must undertake either a Basic Assessment (BA) or Scoping & Environmental Impact Report (S&EIR) in order to obtain an environmental authorisation (if granted by the competent authority) before the commencement of the specified listed activity. The EIA Regulations provide the minimum requirements for appointing an EAP and for undertaking the relevant Public Participation Process (PPP) as required. They also detail the contents of the impact assessment reports and all other aspects associated with BA and/or EIAs.

An Environmental Authorisation process for Portion 59 is being undertaken together with the WULA. A copy of the Basic Assessment Report (BAR) is included in **Annexure 10.12**. A separate Environmental Authorisation (EA) process was Portion 168 and EA issued on 6 August 2018 (GAUT: 002/17-18/E2160). A copy of the EA for Portion 168 is also provided.

4.2 National Water Act (NWA) (Act No. 36 of 1998)

The purpose of the NWA is to ensure that the nation's water resources are protected, used, developed, conserved, managed and controlled in ways which consider amongst other factors:

- Meeting the basic human needs of present and future generations;
- Promoting equitable access to water;
- Redressing the results of past racial and gender discrimination;
- Promoting the efficient, sustainable and beneficial use of water in the public interest;
- Facilitating social and economic development;
- Providing for growing demand for water use; protecting aquatic and associated ecosystems and their biological diversity;
- Reducing and preventing pollution and degradation of water resources;
- Meeting international obligations;
- Promoting dam safety; and
- Managing flooding and droughts.

Part 1 of Chapter 4 (Use of Water) of the NWA sets out general principles for regulating water use. In general, a water use must be licensed unless it is listed in Schedule I, is an Existing Lawful Use, is permissible under a General Authorisation, or if a responsible authority waives the need for a licence. The Minister may limit the amount of water which a responsible authority may allocate. In making regulations the Minister may differentiate between different water resources, classes of water resources.

Section 21 of the NWA lists water uses that must be licensed and includes:

- Section 21(a): taking water from a water resource
- Section 21(b): storing water
- Section 21(c): impeding or diverting the flow of water in a watercourse

- Section 21(d): engaging in a stream flow reduction activity contemplated in section 36
- Section 21(e): engaging in a controlled activity as identified in Section 37 (1) or declared under Section 38 (1).
- Section 21(f): discharging waste or water containing waste into a water resource through a pipe, canal, sewer, sea outfall, or other conduit.
- Section 21(g): disposal of waste (i.e. effluent from sewage works) in a manner which may detrimentally impact on a water resource;
- Section 21(h): disposing in any manner of water which contains waste from, or which has been heated in, any industrial or power generation process.
- Section 21(i): altering the bed, banks, course or characteristics of a watercourse.
- Section 21(j): removing, discharging, or disposing of water found underground if it necessary for the efficient continuation of an activity or for the safety of people.
- Section 21(k): using water for recreational purposes.

There are no wetlands or watercourses in close proximity to the site and as such no Section 21 (c) and (i) water uses apply.

However, due to required abstraction as well as the disposal of the sewage to a several conservancy tank, a number of activities in terms of Section 21 of the National Water Act (NWA) (Act No. 36 of 1998). These include:

- 21(a): taking of water from a water resource; and
- 21(g): disposal of waste in a manner that may detrimentally impact on a water resource.

4.2.1 General Authorisation for the taking and storing of water (GN 538 of 2016)

The revision of General Authorisation (GA) for the taking and storing of water (GN 538 of 2016) came into effect on 2 March 2017. In terms of abstracting water, the GA notes the following:

“A person who owns or lawfully occupies a property or piece of communal land may, in terms of this authorisation, on the property or piece of communal land occupied take water from a groundwater resource up to the maximum volume given in Table 2: Groundwater Abstraction Rates and Storage Volumes in Appendix B for the catchment in which the stored water is taken, subject to the following specific conditions and the general conditions in this notice.”

The borehole occurs within Catchment A21E and the following thresholds apply:

- Maximum volume that may be abstracted is 0 m³ per hectare per year (i.e. the total is dependent on the size of the property).

Therefore, due to the constraints in the catchment, the GA does not apply and a full WULA is required.

4.2.2 Revision of General Authorisations in terms of Section 39 of the National Water Act, 1998 (GN 665 of 6 September 2013)

Section 3 of GN 665 of 6 September 2013 deals with disposing of waste in a manner which may detrimentally impact on a water resource (Section 21 (g)).

The GA defines “on site disposal” as *“the disposal of waste water on individual properties not permanently linked to a central waste collection, treatment and disposal system such as septic tanks, conservancy tank systems, soakaway systems, French drains, pit latrines, some package plants and related activities.”*

It also defines “domestic wastewater” as meaning “wastewater arising from domestic and commercial activities and premises and may contain sewage.”

In terms of Section 3.8:

“A person who (a) owns or lawfully occupies a property registered in the Deeds Office..., (b) lawfully occupies or uses land that is not registered or surveyed; or (c) lawfully has access to land on which the use of water takes place, may in that property or land outside the areas set out in Table 3.1. store domestic and biodegradable industrial wastewater for the purpose of disposal of (a) up to 10 000 m³ per property or land, or (b) up to 50 000 m³ in a wastewater pond system per property or land if the storing of water does not impact on a water resource or any other person’s water use, property or land, and is not detrimental to the health and safety of the public in the vicinity of the activity.”

Unfortunately, Catchment A21 is included in Table 3.1. and therefore, the GA cannot apply and a full WULA is required.

4.2.3 Regulations regarding the Procedural Requirements for Water Use License Applications and Appeals (R. 267 of 24 March 2017)

Further, on the 24 March 2017, the Regulations regarding the Procedural Requirements for Water Use License Applications and Appeals (R. 267 of 24 March 2017) were published and came into effect. This WULA has been compiled in line with this.

5 WATER USES

5.1 Water Use Authorisation Process

The Water Use Authorisation process followed for the proposed development is indicated in Figure 5-1. The following sections provide an overview of the process as it has been undertaken.

5.1.1 Pre-Application Enquiry Meeting and Submission of Application (DW755)

A Pre-Application Enquiry was submitted online on the EWULAAS System of the Department of Water and Sanitation (DWS) on 6 October 2020. This was followed up by email on the same day.

Please see **Annexure 10.2.1** for a copy of the EWULAAS notification and email.

As part of the Pre-Application Enquiry, information on the proposed development (DW755) was submitted.

5.1.2 Site Inspection and Confirmation of Information Requirements

As required by the Procedures, once the Department confirms a WUL process is required, it is necessary for a site visit with Departmental officials to take place. The site visit will be scheduled as soon as possible once feedback from the Department is received.

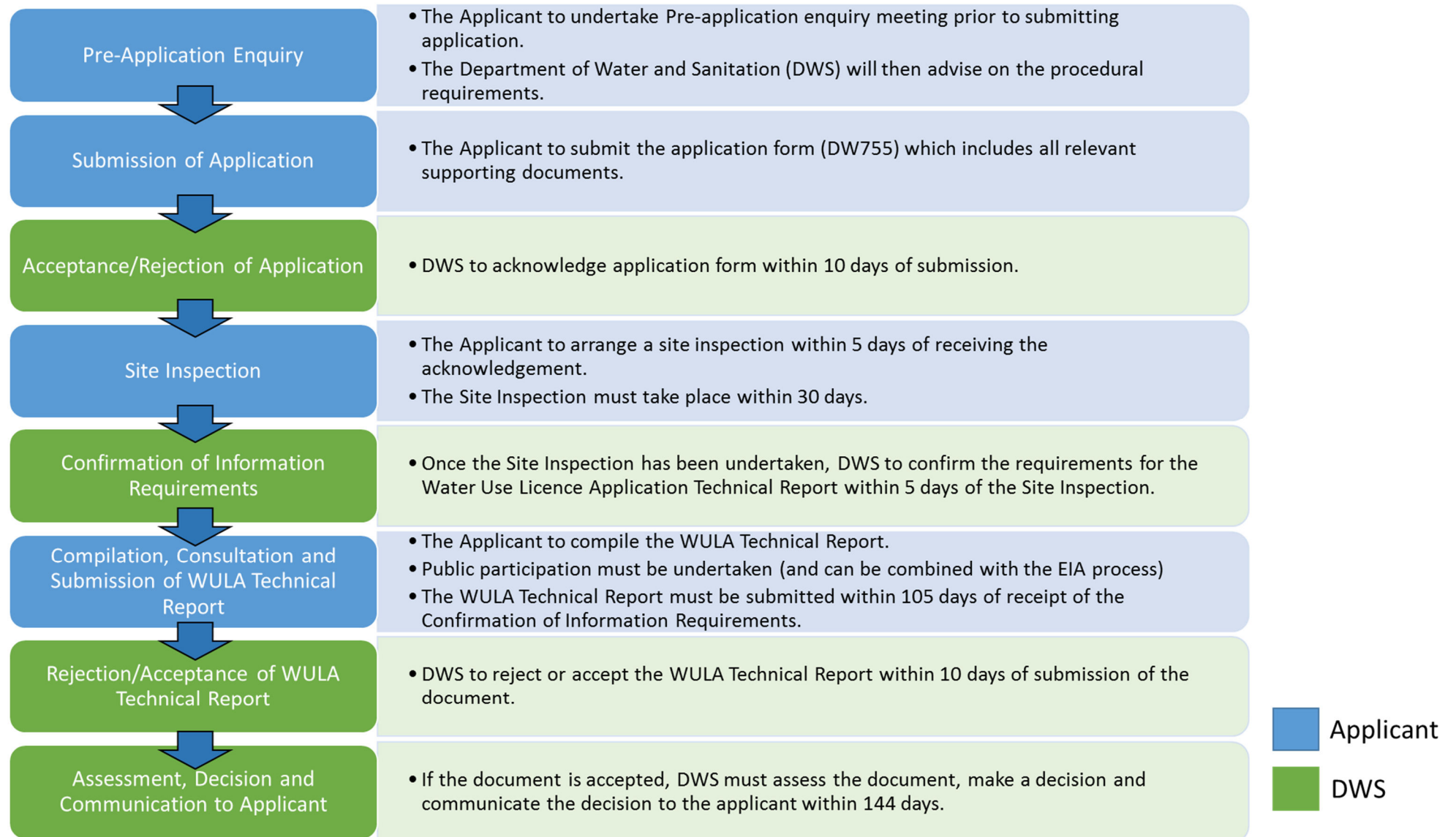


Figure 5-1: Water Use Authorisation Process

5.1.3 WULA Technical Report Compilation

Based on the Departments requirements, information gathering took place including desktop evaluation (via literature review, GIS, topographical maps etc.) as well as specialist studies conducted as part of the Basic Assessment Report (BAR). This information was used to compile the WULA Technical Report (this report) and associated WULA forms. The WULA Technical Report is currently available for public review as part of the review of the EIR. The WULA Technical Report will then be submitted to DWS. All WULA forms have been completed online as per the requirements of the new E-WULAAS System.

5.1.4 DWS Assessment

This Assessment and review step involves the assessment and review of the WULA by the designated official at the DWS Gauteng Regional Office. Should all necessary information be included, the WULA Technical Report will be accepted.

DWS will then undertake a technical evaluation and assessment of the application. If issuing a licence is recommended, a draft licence containing the required conditions will be compiled. The Regional Office official will then submit the application, together with their recommendation, the draft licence, and the supporting documentation, to the relevant delegated authority, who will decide on the application after the Water Use Authorisation Assessment Advisory Committee (WUAAC) has adjudicated on the application.

The decision and the licence, if granted, will be returned by the relevant delegated authority to the official at the DWS Regional Office, who will inform the applicant of the decision

5.2 Gaps and Assumptions

The impacts identified as part of the various specialist studies have heavily influenced the risk assessment included in the Technical Report. As such, it is important to note the assumptions and limitations identified by the various specialists (related to water uses):

The only study undertaken in terms of the WULA is the Baseline Geohydrological Assessment which noted the following data sources and deficiencies in the report:

- Numerous data sources were obtained to investigate and conceptualise the groundwater conditions and to make recommendations for groundwater management. The development of the hydrogeological concepts was based on the following information and data made available to the consulting team or gathered as part of the groundwater investigation:
 - Geological information based on the 1:250 000 scale geology map.
 - National hydrogeological map of South Africa, 1:500 000 scale hydrogeology map.
 - Digital Elevation Model (DEM) based on a 30m x 30 m grid, Advanced Spaceborn Thermal Emission and Reflection Radiometer (ASTRA) data.
 - Groundwater levels and quality data from the hydro-census.
 - Pump test data from the onsite borehole

5.3 Description of Water Use Activities

The sections below provide an overview of the proposed water use activities. Please refer to Annexure 10.9 for a copy of the Water and Sanitation Services Report and designs as well as Annexure 10.11 for the Stormwater Management Plan for more information. The development will be phased and not all planned infrastructure and facilities will be constructed during the first phase however the following facilities will be developed throughout all phases:

- Truck Facilities;
- Car Facilities;
- 4x4 Facilities;
- Taxi Show Room;
- Production Centre;
- Panel and Paint Workshop;
- Vehicle Rental facilities; and
- Vehicle Storage Parking.

These activities will occur on Portion 168¹ and Portion 59 of the Farm Bultfontein 533 JQ.

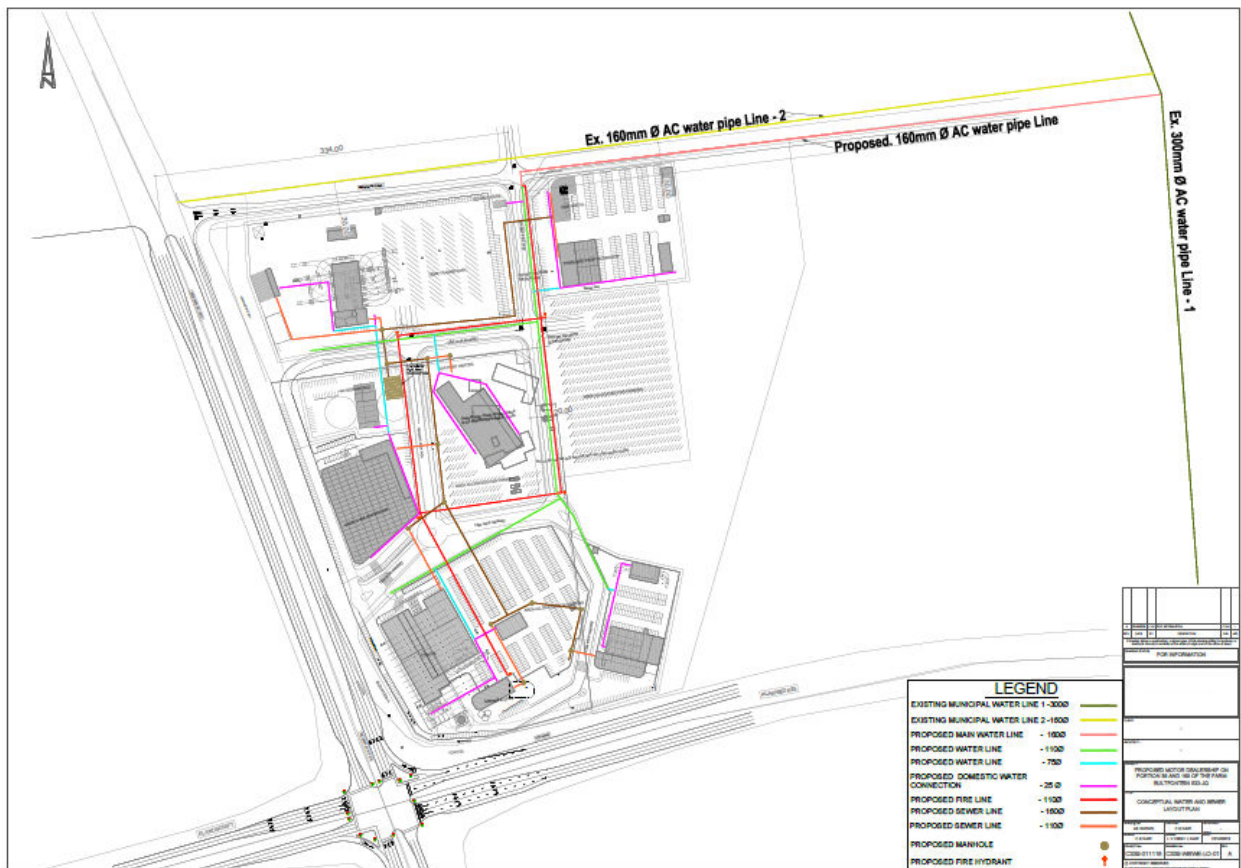


Figure 5-2: Development Plan including services

¹ Already authorised

5.3.1 Portion 168

The development of Portion 168 includes:

- • Car Dealership and 4 x 4 Megaworld
 - Showroom
 - Administration
 - Ablutions and Canteen
 - Parts
 - Workshop
 - Used Car Showroom
 - Used Car Administration
 - Active Reception
 - Parts (mezz)
 - Canteen and changerooms
 - Wash-bay
 - Valet bays and valet store
 - Guard house
 - Refuse area
- Used Car Dealership
 - Showroom
 - Administration
 - Ablutions and Canteen
 - Parts
 - Workshop
 - Canteen and changerooms
- Car Preparation Centre
 - Ablutions and Canteen
 - Parts
 - Workshop

A separate Environmental Authorisation (EA) process was Portion 168 and EA issued on 6 August 2018 (GAUT: 002/17-18/E2160).

5.3.2 Portion 59

The proposed development of Portion 59 will be phased. A summary of the phases are provided below.

5.3.2.1 Phase 1

Phase 1 of the proposed development involves the development of three erven as follows:

- **Erf 1** | Business 1 for a vehicle dealership, workshops, service facility and associated uses.

- This will involve the development and operation of facilities for new and uses vehicle showing, servicing, rental, parking, washing, preparation and administration of vehicles.
- The relevant services and roads will be put in place.
- In addition, complementary uses such as offices, workshops, canteens, change rooms/ablutions, wash bays, spray painting bays, valet stores, guard houses and safety facilities and refuse areas, oil
- Sufficient formal parking will be provided and the site will be landscaped with indigenous trees, shrubs and plants.
- **Erf 2** | Parking and subservient uses
 - This area will be formalized to provide for formal parking area to support vehicle preparation.
- **Erf 3** | Agricultural purposes
 - During the first phase, the remainder of the site will not be developed and will be maintained as is.

The layout of the Phase 1 is provided in **Figure 5-3** below.

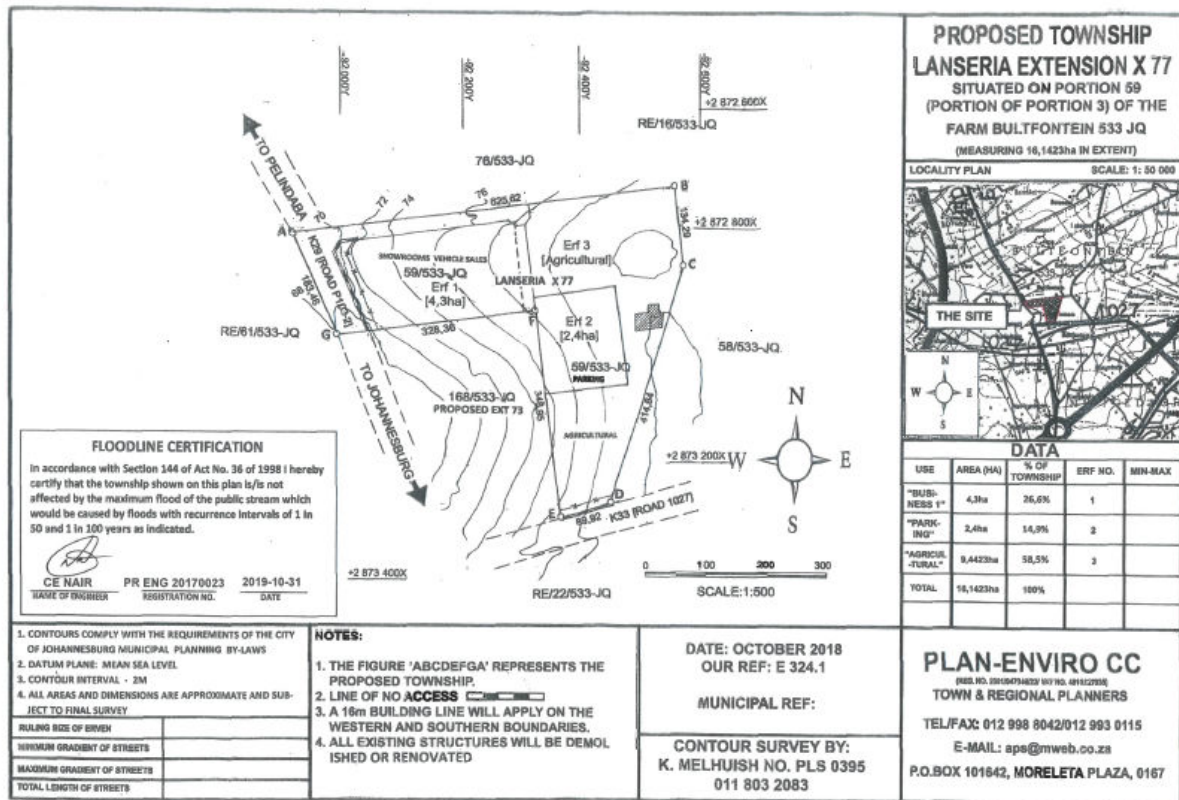


Figure 5-3: Development Layout

5.3.2.2 Phase 2

The second phase of the development involves the development of a car rental and panel and paint workshop and 4x4 megaworld. These will be developed at a later stage when required.

A preliminary site plan is provided in Figure 5-4 and shows both phases.

The aim of this preliminary plan is to provide an indication of the development footprint and its relationship to environmental sensitivities. It should however be noted that this SDP can only be finalized during the townplanning approval process and once the details of phase 2 are confirmed. **A copy of the final SDP will then be submitted to GDARD.**



Figure 5-4: Preliminary Site Plan for both phases

5.3.3 Oil Storage

As the dealership and facilities are required for showing, servicing, rental, parking, washing, preparation and administration of vehicles, oil storage will be required. Twelve separate tanks of 5000 l each will therefore be required at the various dealerships.

5.3.4 Water

Water will be required to service the proposed site. Water to the new site is proposed to be obtained by teeing off the existing 160 mm dia AC water pipe situated adjacent to the northern boundary of Ptn 59 of the Farm Bultfontein, 533-JQ as well as utilising the water from the existing Bore Hole. This proposed connection would be through a 110mm diameter pipe. Internal reticulation for feeding fire hydrants will also be through 110 mm diameter pipes. Water requirements will be 81.71 kl/day.

However, in order to reduce water consumption, Grey water recycling plants are planned for the car wash and truck wash areas. After the initial priming of the system, the total average water demand would reduce to 67,27 kl/d.

Construction shall be in accordance with the Johannesburg Water guidelines and the relevant SANS1200 guidelines.

Most of this water will be obtained from Municipal water supply, however borehole water will be used to supplement this municipal supply.

A Baseline Geohydrological Assessment has been undertaken and includes the following recommendations:

- The recommended abstraction rate for the borehole on site is 0.45 L/s (1182.6 KL per month), based on a pump schedule of 12 hours. However, the current abstraction rate is less than 0.02 L/s (or 52 560 L/month) and the drawdown extent (of less than 0.1 m) will be limited to 80 m.

The maximum volume is therefore included in this application above however it should be noted that actual volumes are likely to be closer to 52 560 L/month (52.6 Kl per month).

5.3.5 Sewer and Sewer Conservancy Tanks

In terms of Sewer services, the average sewer flow is estimated to be 40.34 kl/day. The buildings will be reticulated with 110 mm pipes which will feed into the main 160 mm pipe, which will connect to the sewer conservancy tank. Construction shall be in accordance with the Johannesburg Water guidelines and the relevant SANS1200 guidelines. It should be noted that one sewer conservancy tank is proposed to service both Portion 168 and portion 59. The tank will be located on Portion 168.

Sewer Conservancy tank is proposed which is designed to have a seven (7) day storage capacity (based on average flow) before requiring emptying. Hence required volume of 282.38 kl. Prefabricated plastic conservancy tanks, seven (7) 44.5 kl ('Calcamite' or similar approved), are proposed with a combined storage volume of 311.5 kl. Figure 5-5 below provides an overview of the proposed conservancy tank which is modular in nature. As mentioned, seven tanks will be put in place.

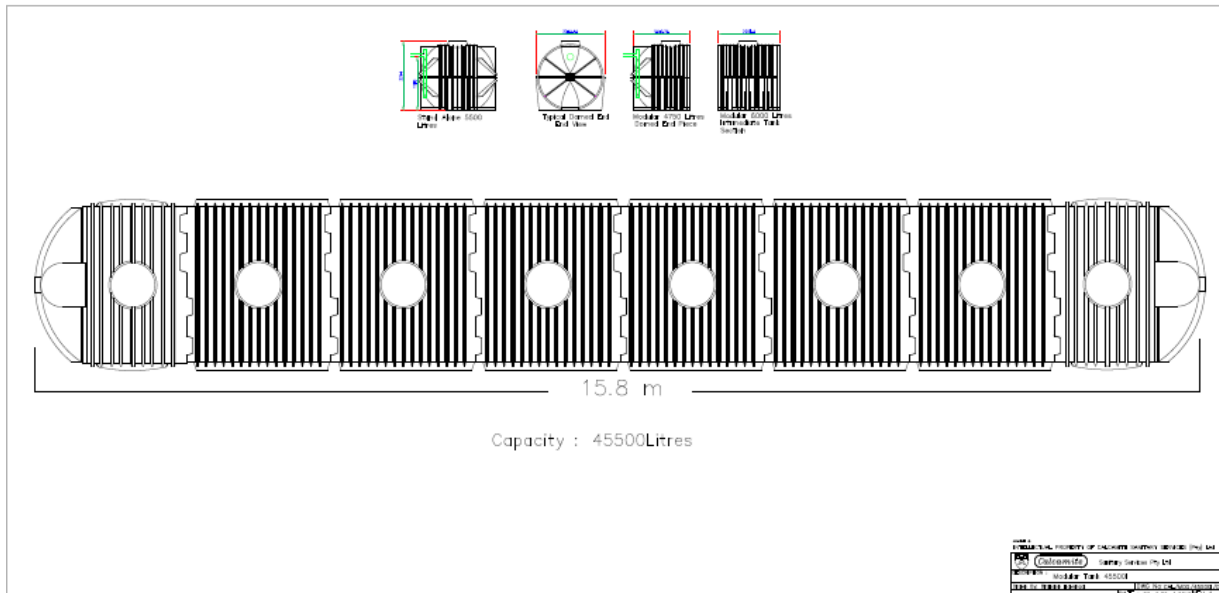


Figure 5-5: Sewer Conservancy Tanks

5.3.6 Grey Water Recycling Plants and Sand, Oil and Grease Traps

As noted previously, the water requirements will be 81.71 kl/day. However, in order to reduce water consumption, Grey water recycling plants are planned for the car wash and truck wash areas. After the initial priming of the system, the total average water demand would reduce to 67,27 kl/d.

As part of this system, Grey Water will be drained via grid inlets at the wash bays and flow a Sand, Oil and Grease Trap before being entering a 10 KL or 5 KL grey water recycling units. (as applicable). Figure 5-6 shows the design of the Sand, Oil and Grease Traps.

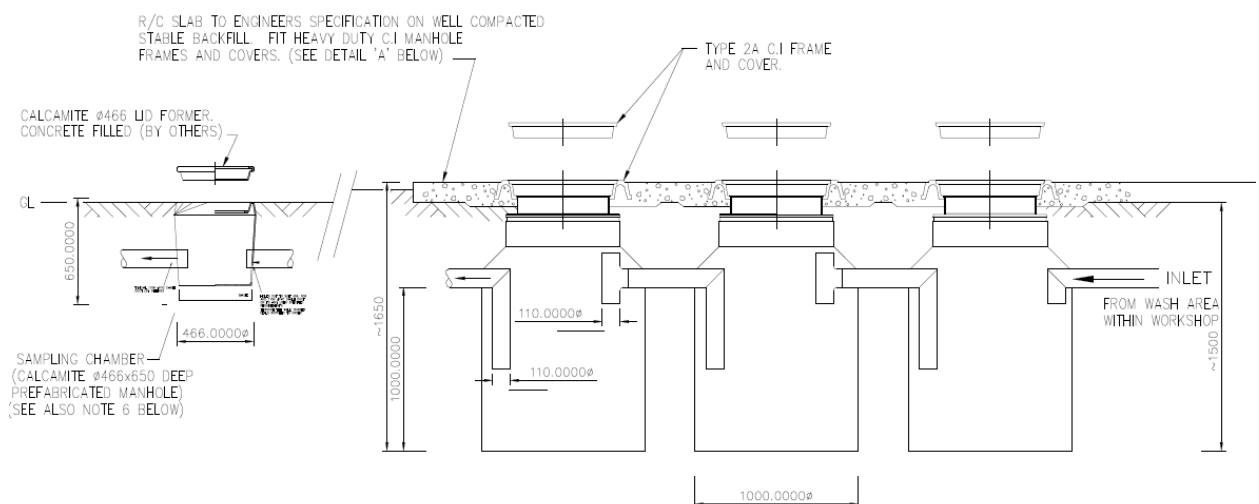


Figure 5-6: Sand, Oil and Grease Traps

The Car Wash facility and Truck Wash facility are proposed to have Greywater Recycle Plants. A 10 kl Package Greywater Recycle Plant is proposed at the Car Wash facility ('Calcamite GreyWater 20' or similar approved) (See Figure 5-7).

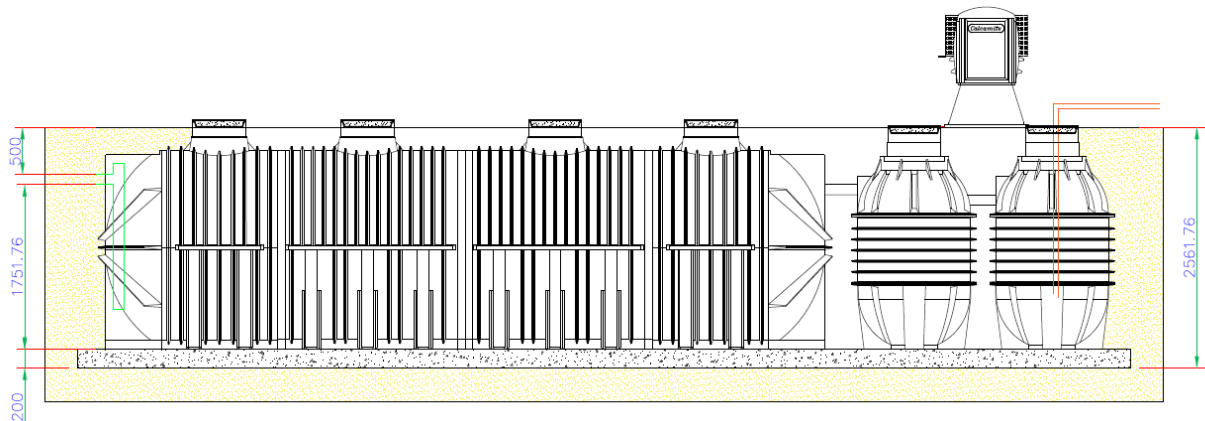


Figure 5-7: Car Wash Grey Water Recycling Unit (10 kl)

A smaller 5 kl Package Greywater Recycle Plant is proposed at the Truck Wash facility ('Calcamite Grey Water 10' or similar approved) (Figure 5-8).

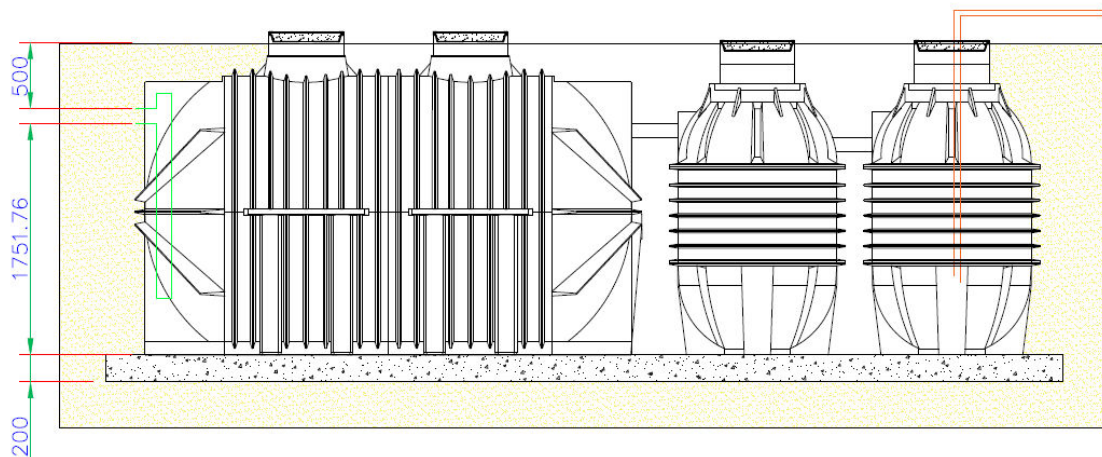


Figure 5-8: Truck Wash Grey Water Recycling Facility (5 kl)

5.3.7 Stormwater

A Stormwater Management Plan has been designed and includes the following:

- In order to ensure water from the truck wash bays is sufficiently dealt with, the water used at the wash bays will be drained via grid inlets at the various locations and is reticulated via 300 mm dia. HD uPVC Class 34 pipes to Prefabricated traps viz. 2 no. 'Calcamite' 3 KL Sand, Grease and Oil Traps (or similar approved) at the Truck Wash Bay.

- In terms of stormwater, bulk drainage is achieved by a network of grid inlets, catchpits and reticulation pipework. The roadways shall be drained by catchpit inlets (Type S2, D3) situated at road edge. The forecourt area shall be drained by grid inlet manholes.
- Bulk stormwater pipes shall be Spigot and Socket Concrete Pipes with rolling rubber rings to ensure watertightness. The intercepted flows are reticulated to the Sand Oil Grease Traps. The concrete pipe sizes vary from 375 mm dia. up to 900 mm dia. depending on the flow accumulation.
- The flow is reticulated into the Sand Oil Grease Traps to filter the stormwater and is then diverted to the attenuation tank. The flow then leaves the attenuation tank and is reticulated to a new stormwater headwall via a 900 mm dia. pipe and discharged overland in a North Westerly direction on to the road surface. The headwall apron slab has splitter blocks and a “stilling basin” is formed with a combination of reno mattresses and gabion boxes to further dissipate the velocity and energy of the flow. These interventions also provide erosion control.

5.3.8 Electricity

Electricity will be obtained from Eskom. The buildings will comply with NHBRC standards (SANS 10400) for energy efficiency. As part of this, the following measures will be put in place:

- Energy saving measures for water heating (for example heat pumps or solar);
- LED lamps;
- General control switching (to minimise use of lights when not needed); and
- Energy saving appliances.

Further, solar panels may be put in place (if feasible). This would involve the placement of solar panels over the parking areas which would provide approximately 15 to 20 megawatts.

5.3.9 Access, Roads and Parking

A Traffic Impact Assessment has been undertaken and provides the detailed requirements for access to the site, parking and necessary intersection upgrades. These include:

- The access is to be used by both light and heavy vehicle's and should be designed as follows:
 - Two (2) ingress lanes (3,5 m wide lane for light vehicle's only and a 4,5 m wide lane for both heavy and light vehicle's).
 - One (1) egress lane (4,5 m wide lane for both heavy and light vehicle's).
 - The access control device is to be set back at least 30,0 m from the internal road.
 - The bell mouth radii as illustrated on **Figure 5-9** below.
 - The proposed access is to be designed according to the Johannesburg Roads Agency (JRA) Roads and Stormwater design guidelines together with the Urban Transport Guideline (UTG 10) for the geometric design of commercial and industrial local streets commercial and industrial local streets.
 - It is proposed that access road to the site be upgraded as follows:

- The road pavement is to be surfaced and layer-works designed to accommodate heavy vehicle's (car carriers)
- The site will be able accommodate 1812 parking bays. The parking bays will be 90 degrees, having dimensions of 5,0 m long by 2,5 m wide and a minimum aisle width of 7,5 m. This is in line with the DOT (1995) parking standards. Safe pedestrian crossings and walkways should be provided to direct pedestrians between pedestrian accesses, parking areas and the buildings.
- Upgrades to Pelindaba Road and Access Road Intersection (Intersection 1) are also required as follows:
 - A dedicated short right-turn lane (30,0 m) is required at the east approach (access road)
 - The existing lane at the east approach is to be converted to a shared left and through lane
 - A dedicated short right-turn lane (30,0 m) is required at the west approach
 - The existing lane at the west approach is to be converted to a shared left and through lane
- Further, it is proposed that 2,0 m wide paved sidewalk be provided along the site frontage which will ease and formalise the movement of pedestrians between the site access and public transport facilities.

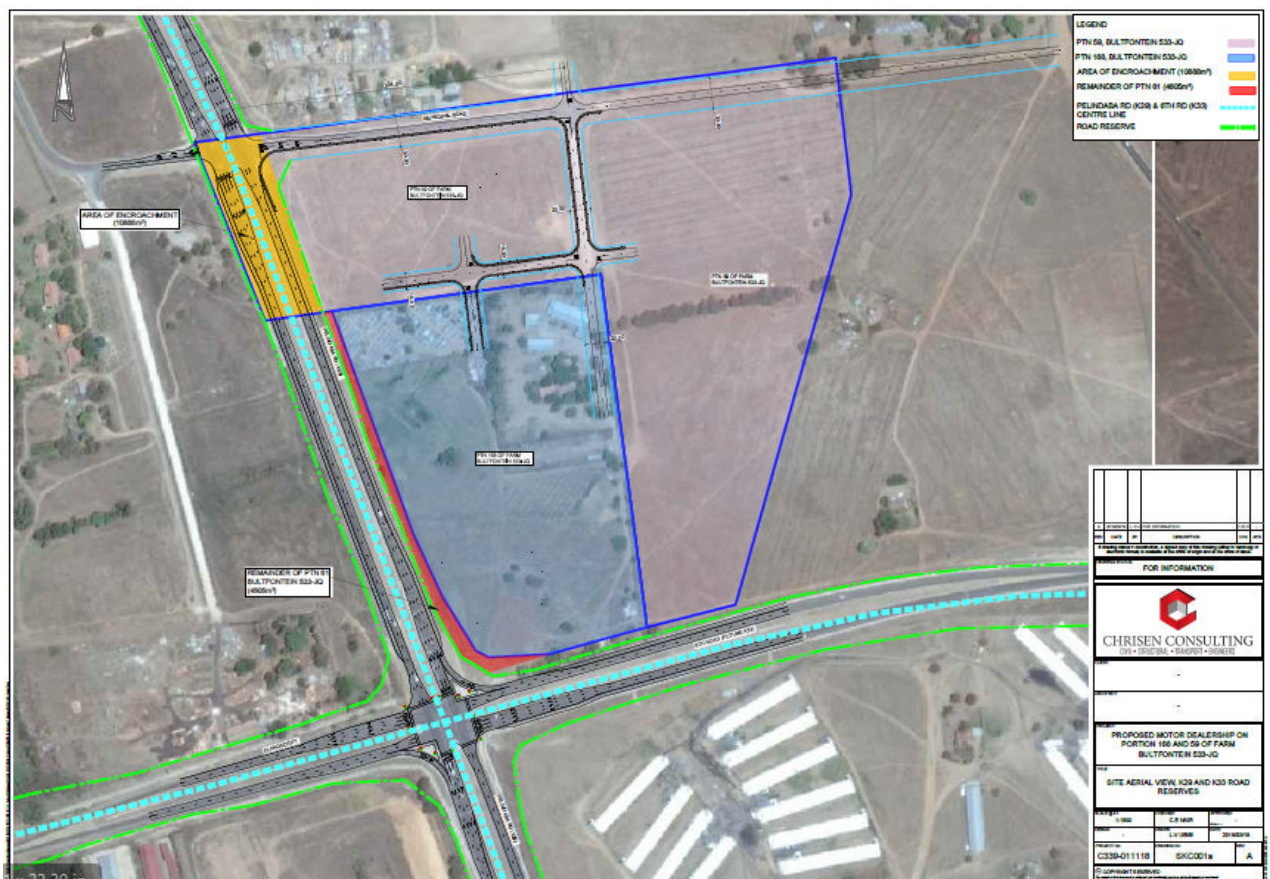


Figure 5-9: Access

5.4 Water Uses

According to Section 22 of the NWA a person may only use water under the following circumstances:

- Without a license –
 - If that water use is permissible under Schedule 1;
 - If that water use is permissible as a continuation of an Existing Lawful Use; or
 - If that water use is permissible in terms of a General Authorisation issued under Section 39;
- If the water use is authorised by a license under this Act; or
- If the responsible authority has dispensed with a license requirement under Section 22(3) of the Act.

In the case of this project a licence is required to undertake the water uses that are associated with the project, based on the likely risk, nature, and extent of potential impacts of the proposed project on the affected water resources.

5.4.1 Existing Lawful Water Uses

The applicant, the 4 Wheel Property Holdings (Pty) Ltd., does not have any Water Use Licenses awarded to them for the development of the Portion 168 and 59 of the Farm Bultfontein 533 JQ.

5.4.2 Relevant Exemptions

There are no relevant exemptions applicable.

5.4.3 Generally Authorized Water Uses

In terms of Section 22(1) of the NWA a person may use water without a license if that water use is permissible in terms of a General Authorisation (GA) issued under Section 39 of the Act. An assessment was done of the General Authorisations under the NWA and the following GAs are in place:

- The revision of General Authorisation (GA) for the taking and storing of water (GN 538 of 2016) came into effect on 2 March 2017.
 - Due to the fact that the project involves abstraction of groundwater from A21E, the GA does not apply as the proposed abstraction is greater than 0m³ per hectare.
- The Revision of General Authorisations in terms of Section 39 of the National Water Act, 1998 (GN 665 of 6 September 2013):
 - This GA is not applicable as although the conservancy tanks are small, they occur in A21E and thus are excluded from the GA.

Thus, whilst a number of general authorisations exist for the activities identified above, they are not applicable due to the location of the site within Quaternary catchment A21E.

5.4.4 Description of New Water Use

In order to ensure ease of understanding, an overview of all water uses is provided in

Figure 5-10. This is followed by tabulated water uses (Table 5-1). This table correlates to the Water Use License Application Forms that will be submitted to DWS as part of the Final Technical Report.

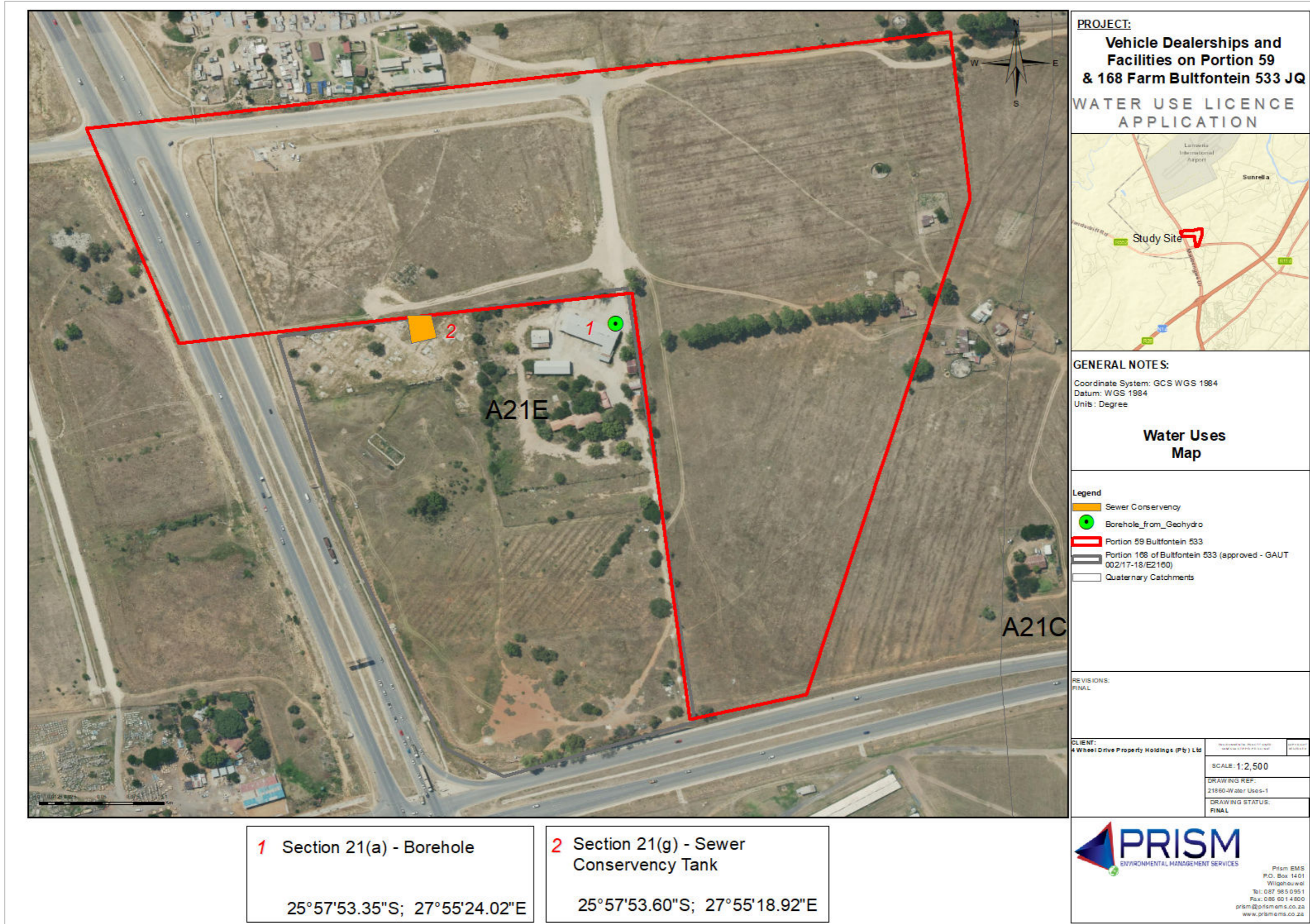


Figure 5-10: Water Uses Map

Table 5-1: Details of the water uses being applied for

Form Ref (Related to Online System*)	Property Details	Water Use	Description of Water Use	Dimensions (m / m ³)/Details	Purpose	Co-ordinates		QC
						Start	End	
1	Portion 168 of the Farm Bultfontein 533 JQ	Section 21(a)	Borehole	<p>An existing borehole will be utilised to supplement municipal supply. Based on the Geohydrological Baseline Assessment.</p> <ul style="list-style-type: none"> The recommended abstraction rate for the borehole on site is 0.45 L/s (1182.6 KL per month), based on a pump schedule of 12 hours. 	To supplement municipal water services on site.	25°57'53.35"S 27°55'24.02"E		A21E
2		Section 21 (g)	Sewer Conservancy Tank	<p>In terms of Sewer services, the average sewer flow is estimated to be 40.34 kl/day. The buildings will be reticulated with 110 mm pipes which will feed into the main 160 mm pipe, which will connect to the sewer conservancy tank. Construction shall be in accordance with the Johannesburg Water guidelines and the relevant SANS1200 guidelines. It should be noted that one sewer conservancy tank is proposed to service both Portion 168 and portion 59. The tank will be located on Portion 168.</p> <p>The conservancy tank which is designed to have a seven (7) day storage capacity (based on average flow) before requiring emptying. Prefabricated plastic conservancy tanks ('Calcamite' or similar approved) are proposed with a combined storage volume of 55.0 kl.</p>	To collect and store sewage on site until collection and disposal at the necessary registered facility.	25°57'53.60"S 27°55'18.92"E		

6 PROFILE OF THE RECEIVING ENVIRONMENT

6.1 Local Climate

The climatological data for the Chartwell area which is approximately 4.5km to the east of the site is provided below.

6.1.1 Temperature

In terms of temperature, average temperatures for the period 2009 to 2020 ranged between 21°C and 29°C in summer and between 9°C and 18°C in winter (www.worldweatheronline.co.za) (Error! Reference source not found.).

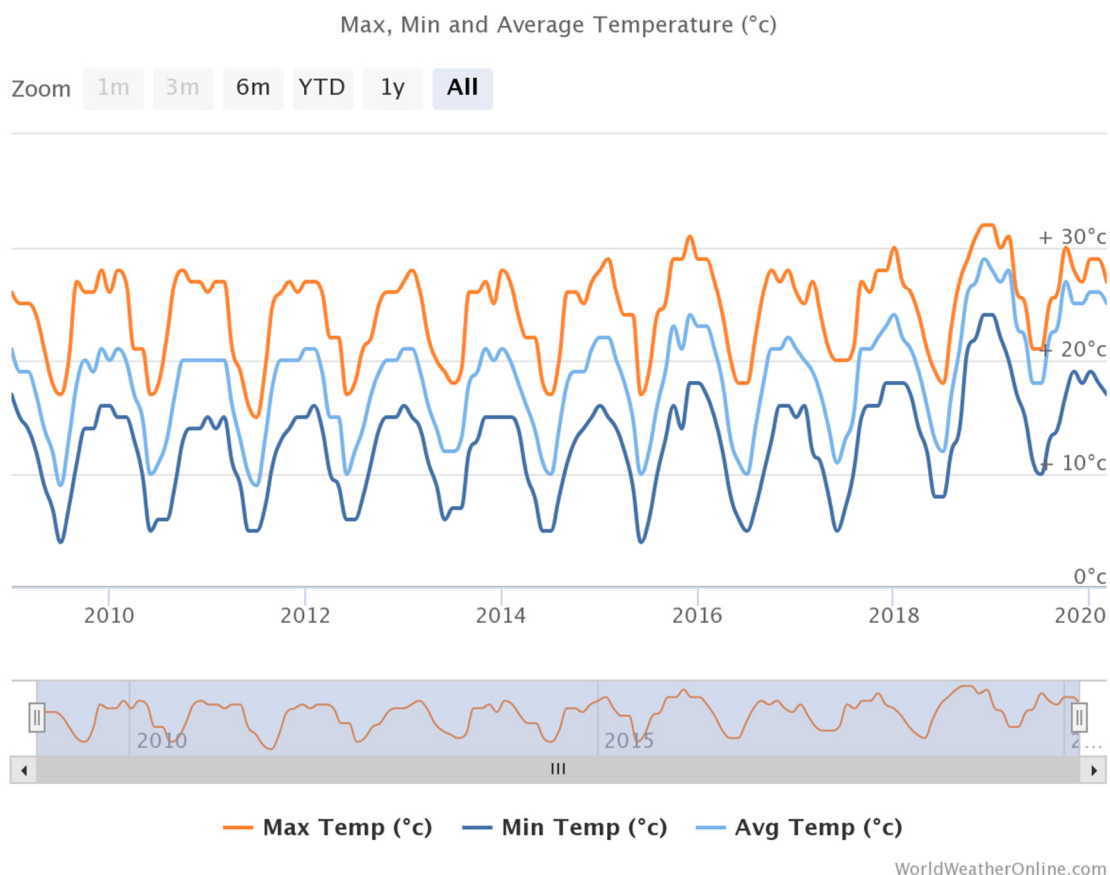


Figure 6-1: Minimum, Maximum and Average Temperatures for Chartwell, Gauteng (www.worldweatheronline.co.za).

6.1.2 Rainfall

The City of Johannesburg is located in a summer rainfall region and rainfall typically occurs in the form of late afternoon showers during October to April. The annual average rainfall is 713 millimetres, mostly concentrated in the summer months (City of Johannesburg, 2009). Figure 6-2 below shows the average rainfall in Chartwell, Gauteng for the period 2009 to 2020.

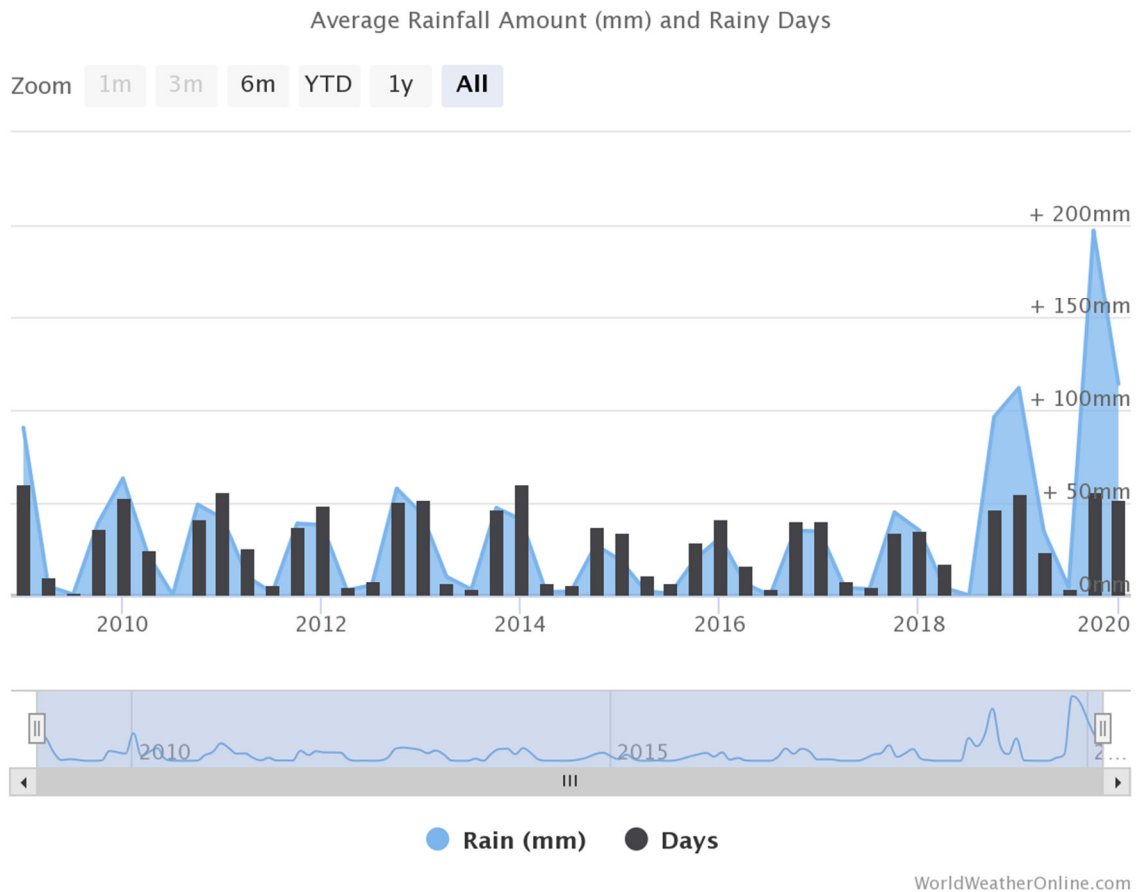


Figure 6-2: Average Rainfall Amount (mm) and Rainy Days (World Weather Online)

6.2 Geology

The area is characterised by granites and gneiss rock types, typical of the basement rock formation (Figure 6-3). The term basement rock applies to any hard, crystalline or recrystallised, igneous or metamorphic rock associated with Precambrian Age, including ancient Archaean cratonic rocks (granites, gneisses, greenstones), metamorphic rocks associated with mobile belts (usually deformed and of Proterozoic age) and anorogenic intrusions of variable age (Arcworth 1987; Jones 1985; Wright and Burgess 1992; Key 1992). Granite, from a geological point-of-view, can be considered any intrusive or hypabyssal, felsic, igneous, or metamorphic rock composed of predominantly quartz and feldspar (orthoclase and plagioclase). Igneous granites (granites or granitoid rocks) typically comprise alkali feldspar granite, granite, granodiorite and tonalite. Granitic weathering shows typical weathering patterns associated with saprolite, laterite, fissures followed by fresh basement (Dippenaar et al, 2009).

This fractured-weathered layer is generally characterized by a fracture density that decreases with depth, and which can be related to cooling stresses in the magma, subsequent tectonic activity (Houston and Lewis, 1988) or litho-static decompression processes (Wright, 1992). The horizon of fracturing between the fresh rock and the regolith frequently has a higher permeability, depending on several factors including the nature of the fracturing and the presence of clay in the fractures. Fresh basement (un-weathered) is permeable only locally where deep tectonic fractures are present.

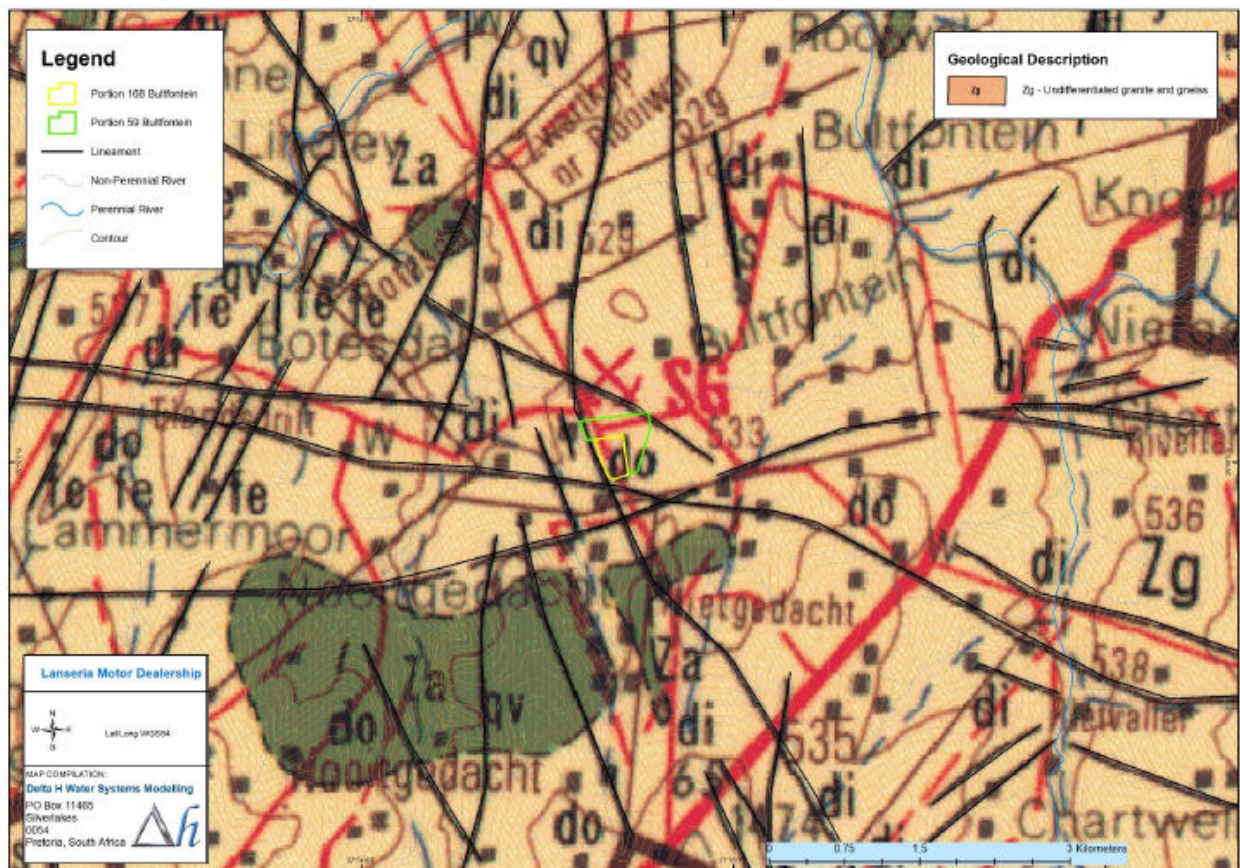


Figure 6-3: Geology

6.3 Groundwater

Delta H (Delta-H Water System Modelling PTY Ltd) has undertaken a Baseline Geohydrological Assessment (2020). A summary of the baseline environment provided below has been taken from this report. Please refer to Annexure Baseline Geohydrological Assessment 10.3.1. for the full report.

6.3.1 Hydro-stratigraphic zones

Based on the conceptual hydrogeological understanding of the site, the following hydro-stratigraphic zones are differentiated within the model area:

- Shallow alluvial and weathered basement aquifer
- Fractured basement aquifer

These are described in the subsections below.

6.3.1.1 Weathered basement aquifer

The weathered zone of the basement rock hosts the unconfined or semi-confined shallow weathered basement aquifer or hydro-stratigraphic zone. Due to direct rainfall recharge and dynamic groundwater flow through the unconfined aquifer in weathered basement rock, the water quality is generally good, but in the absence of an overlying confining layer also vulnerable to pollution. Localised perched aquifers, formed

from secondary mineralised clay layers and ferricrete layers, may occur. Water intersections in the weathered aquifer are mostly above or at the interface to fresh bedrock (basement), where less permeable layers of weathering products and capillary forces limit the vertical percolation of water and promote lateral water movement.

6.3.1.2 Fractured basement aquifer

The fractured basement aquifer consists of mostly granites and gneiss. Groundwater flow is governed by secondary porosities like faults, fractures, joints, bedding planes or other geological contacts, while the rock matrix itself is considered impermeable. Geological structures are generally better developed in competent rocks like granites and gneiss. Not all secondary structures are water bearing due to e.g. compressional forces by the neo-tectonic stress field overburden closing the apertures. The fractured basement aquifer is considered a confined aquifer.

Fractured basement aquifers have typically a low hydraulic conductivity, but are known to be highly heterogeneous with yields ranging from 0.5L/s to even higher yield than 10L/s. Higher yields are typically associated with higher hydraulic conductivities along fracture zones associated with faults and shear zones and at contact zones with intrusive rocks. Depending on the residence time of the water in the aquifer, groundwater quality can be poor.

6.3.2 Hydrocensus

The aim of the groundwater census was to describe the water occurrences in qualitative and quantitative terms. A hydrocensus forms part of a quantitative approach to determine baseline water conditions. The hydrocensus was conducted in the vicinity of the Motor Dealership on the 20th and 24th of August 2020. The hydrocensus reported on borehole location, status, depth, water level, distribution, use and ownership. A total of six (6) groundwater samples were collected and submitted to an accredited laboratory, Waterlab (Pty) Ltd.

6.3.2.1 Groundwater levels

Four (4) groundwater levels obtained from the hydrocensus in the area. The groundwater level ranges from 22.7 metre below ground level [m bgl] to 29.3 m bgl with an average groundwater level of 26 m bgl. The groundwater levels measured at the Motor Dealership is 29.28 mbgl. It is expected that the general groundwater flow is mostly west with localised flow towards river systems or depression areas. Geo-spatial illustration of the boreholes from the hydrocensus is presented in Figure 6-4.



Figure 6-4: Hydrocensus

6.3.2.2 Groundwater quality

Water samples were collected at six (6) geo-sites during the hydro-census. The concentrations of selected constituents of groundwater samples were compared against the following standards / target values:

- SANS (241-1 2015) South African National Standards for Drinking Water.
- South African Water Quality Guidelines for Drinking Water (DWAF 1996).

Based on the results the groundwater quality at the project site is characterised by neutral pH conditions with elevated nitrate concentrations. The boreholes located at and around the project site exceed the target values for nitrate (except borehole LBH3).

The current groundwater baseline quality indicates average water quality with elevated nitrate concentrations in the area. The nitrate concentrations below 10mg/l could be from naturally occurring sources in the plutonic rocks, however concentrations above this can be attributed to organic fertilization from animal farms, such as the poultry farm, historical agricultural practices, septic tanks and leaking sewage systems

6.3.3 Hydraulic Test

The existing boreholes on site was used to conduct a short-term pumping test to determine the aquifer characteristics/parameters and propose a recommended abstraction yield. The pump test consisted of

three, 30min step tests with recovery following a 2.5-hour (135min) pump test with recovery up to 95% of the rest water level. The aquifer parameter estimates are therefore based on drawdown and recovery data from the step drawdown (SDT) and constant discharge test (CDT). The summary of the pumping test is provided in Table 6-1.

Table 6-1: Pump test summary

Name	Water Level (mbgl)	Available Drawdown (m)	Step Test	Constant Discharge Rate (l/s)	CDT Duration (min)	Final Drawdown
LBH1	16.61	55.52	Step 1: 0.14l/s Step 2: 0.28 l/s Step 3: 0.56 l/s	0.42	135.00	12.58

6.3.4 Calculated Yield

Borehole yields (defined as the yield that can be maintained over a short-term (2-year) period with water levels above a specified level), were calculated using Van Tonder et al. (2002) that developed the Flow Characteristic Excel Spreadsheet (FC Method). The FC method addresses the long-term assurance of water supply from a borehole based on available drawdown figures, hydraulic boundaries, and abstraction rates, but does not define the resource yield. A summary of the borehole estimated yield and drawdown is given in Table 5.3. Current groundwater use (from the borehole) at the Motor Dealership is estimated to be less than 0.02 L/s (or 52 560 L/month). The borehole potential exceeds the current abstraction rate.

Table 6-2: Summary of yield rates for dewatering

Name	Recommended Yield	Note/Comment
LBH1	0.3	24 hours
	0.45	12 hours
		Based on the drawdown derivative plot, the aquifer shows a good fracture network. Available working drawdown was set to 10m.

6.3.5 Groundwater Vulnerability

Groundwater vulnerability gives an indication of how susceptible an aquifer is to contamination. Aquifer vulnerability is used to represent the intrinsic characteristics that determine the sensitivity of various parts of an aquifer to being adversely affected by a contaminant load imposed from surface. Figure 6-5 shows the national groundwater vulnerability ratings underlying the project area, indicating the tendency or likelihood for contamination to reach a specified position in the groundwater system after introduction at some location above the uppermost aquifer. The method is based on the DRASTIC method which includes the following parameters: Depth to water table; Recharge (net); Aquifer media; Soil media; Topography; Impact of the vadose (unsaturated) zone; conductivity (hydraulic).

Based on the national results, the aquifer underlying the project area has a medium vulnerability rating.

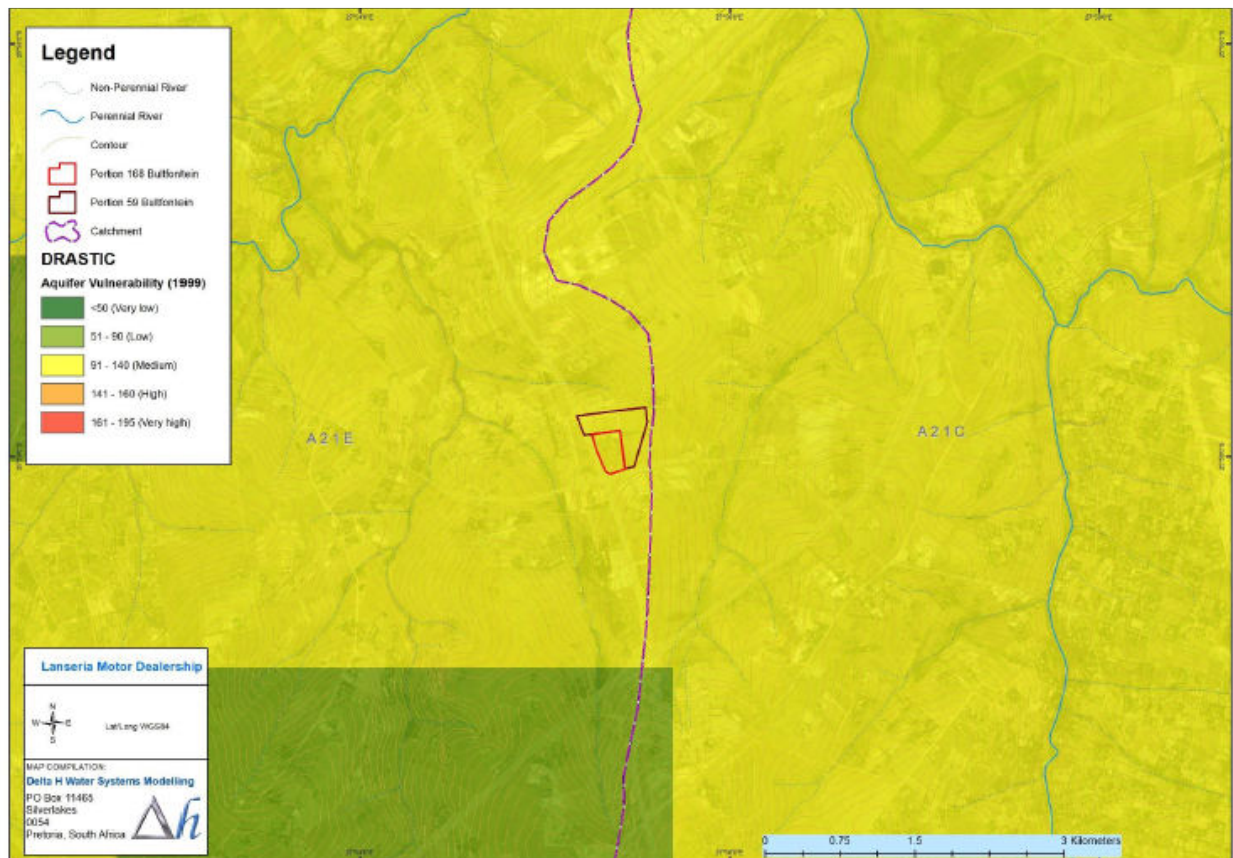


Figure 6-5: Groundwater Vulnerability

However, it must be kept in mind that the compilation of groundwater vulnerability map, which rely on the intrinsic natural properties of an area and aquifer, are not very meaningful in the context of the historically undermined project area. The natural aquifer properties in the project area are extensively altered by the existence of open underground mine voids, land subsidence due to shallow undermining, neighbouring mining activities, mine residue deposits and acid rock drainage. The maps should therefore only be seen in regional context.

6.3.6 Aquifer Classification

According to the Hydrogeological Map (1:500 000) series, the regional hydrogeology is characterized as an 'intergranular and fractured aquifer' with a typical potential yield of 0.5 – 2.0 litres per second. A micro-fractured matrix in the fractured Basement aquifers provides the storage capacity with limited groundwater movements, while secondary features such as fractures / faults and bedding planes enhance the groundwater flow. Based on the aquifer classification map (Parsons and Conrad, 1998), the aquifer system underlying the project area is regarded a "minor aquifer".

6.3.7 Aquifer Protection Classification

As part of the aquifer classification, a Groundwater Quality Management (GQM) Index is used to define the level of groundwater protection required (Parsons 1995).

A Groundwater Quality Management Index of 4 was estimated for the project area from the ratings for the Aquifer System Management Classification. According to this estimate, a medium-level groundwater protection is required for the intergranular and fractured aquifer. Reasonable groundwater protection measures are recommended to ensure that no cumulative pollution affects the aquifer, even in the long term. DWS's water quality management objectives are to protect human health and the environment. Therefore, the significance of this aquifer classification is that if any potential risk exists, measures must be taken to limit the risk to the environment, which in this case is the protection of the underlying aquifer.

6.3.8 Conclusion and Recommendations

Shallow interflow, perched water and waterlogged land may possibly result in water influencing development and development impacting on the shallow movement of water, especially during development of the saturated conditions on site.

In summary, the potential groundwater impacts on site are:

- Insignificant w.r.t the shallow weathered and fractured aquifers of the Swazian age rocks/ basement aquifer system,
- Unlikely to impact third party groundwater users, should a 12-hour pump schedule be followed, and
- based on the expected drawdown extent not likely to impact on groundwater contribution to baseflow.

The following recommendations are given regarding the monitoring protocol for the project site:

- The recommended abstraction rate for the borehole on site is 0.45 L/s, based on a pump schedule of 12 hours. However, the current abstraction rate is less than 0.02 L/s (or or 52 560 L/month) and the drawdown extent (of less than 0.1 m) will be limited to 80 m.

Potential groundwater related impacts are expected to be insignificant w.r.t the shallow weathered and fractured aquifers of the aquifer, unlikely to impact third party groundwater users and unlikely to impact groundwater contribution to baseflow.

The existing borehole on site should be monitored for water levels and qualities. The following monitoring frequencies are recommended:

- Water levels: Monthly
- Water qualities: Quarterly

6.4 Socio-Economic Environment

The proposed development occurs within the City of Johannesburg in Gauteng. A summary of the socio-economic environment for the City of Johannesburg (obtained from StatsSA) is included below.

6.4.1 City of Johannesburg Socio-Economic Environment

The City of Johannesburg Local Municipality is situated in Gauteng province and covers an area of 1 645km². The City is the provincial capital of Gauteng, the wealthiest province in South Africa. According to Census 2011 information, the area has a total population of 4,4 million of which 76,4% are black African, 12,3% are white people, 5,6% are coloured people, and 4,9% are Indian/Asian.

Figure 6-6 below shows that the majority of people in the area have either some primary school education (33.6%) or secondary education (30%). Only 20.8% of the population has completed secondary school and an even smaller percentage (5.3%) have higher education (Stats SA, 2017).

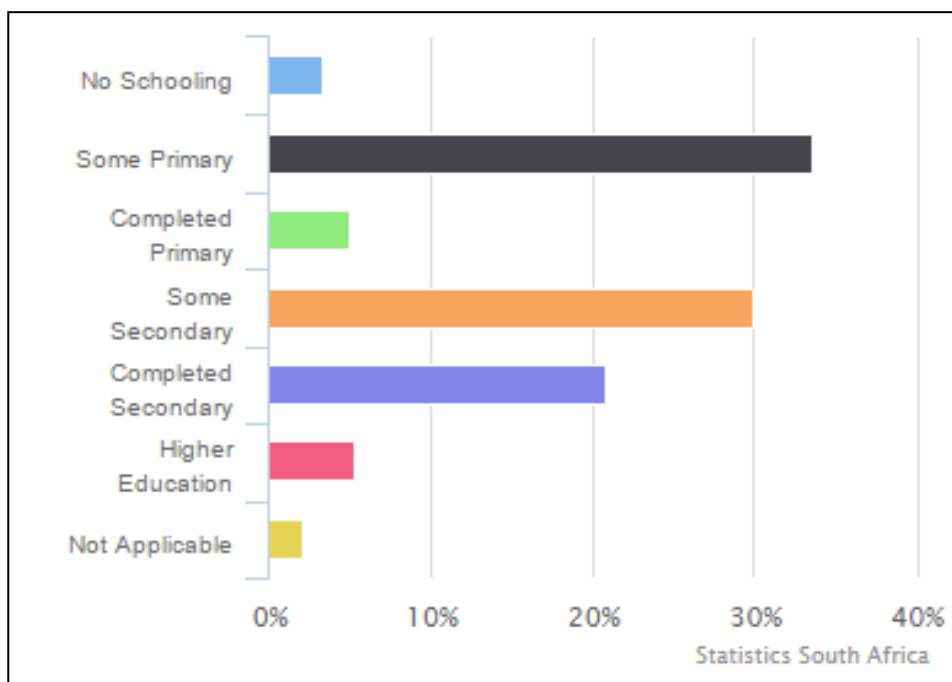


Figure 6-6: Highest Education Level (All Ages) (Stats SA, 2017).

Approximately 72.7% of the population are at a working age (15-64). Of those, approximately 52.6% (1 696 520 people) are employed (Figure 6-7). The unemployment rate for the area is 25%. Of the 1 228 666 economically active youth (15-35 years) in the area, 31,5% are unemployed. In terms of living conditions, there is 1 434 856 households in the municipality with an average household size of 2,8 persons per household. 64,7% of households have access to piped water, 26,9% have water in their yard and only 1,4% of households do not have access piped water (Stats SA, 2017).

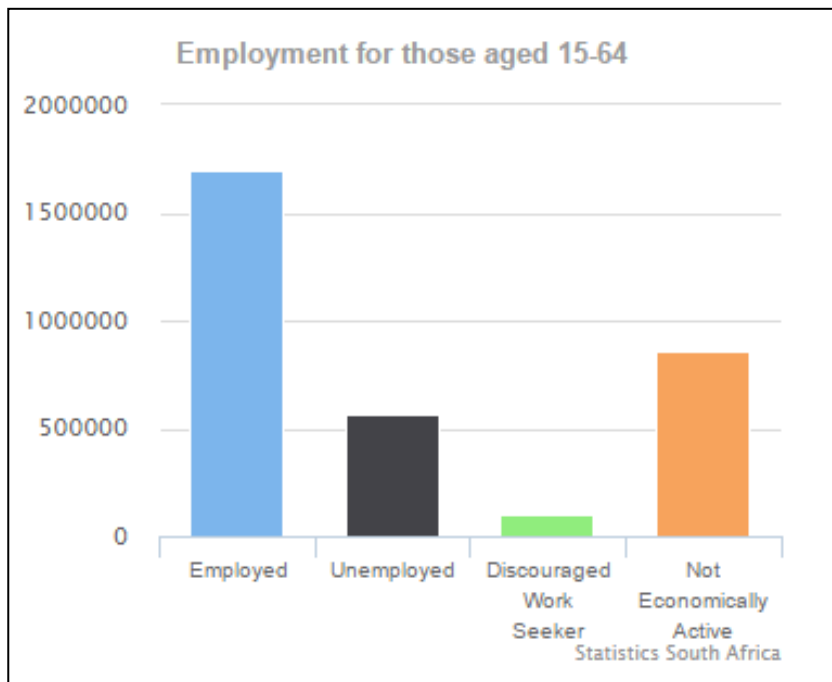


Figure 6-7: Employment for those aged 15-64 (Stats SA, 2017)

6.4.2 Planning Documents

In addition to the above, the following planning documents and frameworks apply to the area and are discussed in more detail in the following subsections:

6.4.3 Regional Spatial Development Framework (RSDF), 2011: Administrative Region A:

The RSDF represents the prevailing spatial planning policy within the City of Johannesburg and is adopted in terms of the Municipal Systems Act, 2000 (Act No. 32 of 2000) as an integral component of the City's Integrated Development Plan (IDP).

The proposed development is situated within the City of Johannesburg Metropolitan Municipality in Region A. Region A, is one of seven administrative regions that make up the City of Johannesburg. It is located on the northern periphery of the City of Johannesburg Metropolitan area, bordered by Region C and Region E to the south, Mogale City Local Municipality to the west, City of Tshwane Municipality to the north and City of Ekurhuleni Municipality to the east. The Greater Diepsloot and Greater Ivory Park areas are classified as Marginalised areas and are among the most prioritised areas in terms of the Growth Management Strategy (GMS).

The proposed study site is situated in Sub-Area 1 of Region A according to the Regional Spatial Development Framework. The key-structuring element within the sub area is the Lanseria speciality node, which is surrounded by agricultural holdings and farm portions. One of the main development objectives in the area is to promote the development of a demarcated specialist node which includes the support of

suitable commercial and light industrial land uses. The proposed development is therefore in line with this development objective.

6.4.4 Gauteng Spatial Development Framework 2030 (GSDF)

The GSDF is part of the executive authority of the provincial government and an integral component of the governance structure of the province as a whole, and as such must assist in ensuring the realization of national, regional, provincial and local development objectives. Some of the spatial imperatives and opportunities that will support the area include:

- Develop the larger Lanseria node, so that it contributes to spatial transformation.

The proposed development is in line with the concept of developing the Lanseria node.

6.4.5 Socio-Economic Motivation

In terms of the need and desirability of the project, it should be noted that the proposed development will further the objectives of both the Gauteng Spatial Development Framework and Region A Regional Spatial Development Plan by creating commercial land uses in the Lanseria node.

In addition, market research undertaken by Toyota SA has indicated that there is a need for a dealership of this type in the area. From a socio-economic perspective, the proposed development will benefit the area in by improving the image of the area and increasing the local economy as the development will result in approximately R80 million investment in the area which will have numerous economic multiplier effects that will benefit the region positively.

7 ALTERNATIVES ASSESSED AS PART OF THE EIR

In line with the EIA Regulations, 2014, a number of alternatives have been assessed for the proposed development. These are pertinent to the WULA process as well and include:

- Layout alternatives; and
- The No -Go Option.

More information on each of these alternatives is provided below.

7.1 Layout Alternatives

Two alternatives are assessed as part of the Basic Assessment Process in addition to the No-Go Alternative. These included:

- Proposal; and
- Alternative 1.

The main differences between the proposal and alternative is erf 1 (the Hino Dealership).

The proposal involves the development of the north-western section of the site with the truck dealership. In the proposal, the dealership buildings and showrooms along the western boundary of the site (parallel to the R512). The aim of this placement is to increase visibility. The parking area is then located towards the back of the development footprint (Figure 7-1)

The alternative differs the parking area is located along the western boundary and the dealerships are then behind the parking area. This reduces the visibility of the truck dealership and thus has a related negative socio-economic impact (Figure 7-2).



Figure 7-1: Proposal

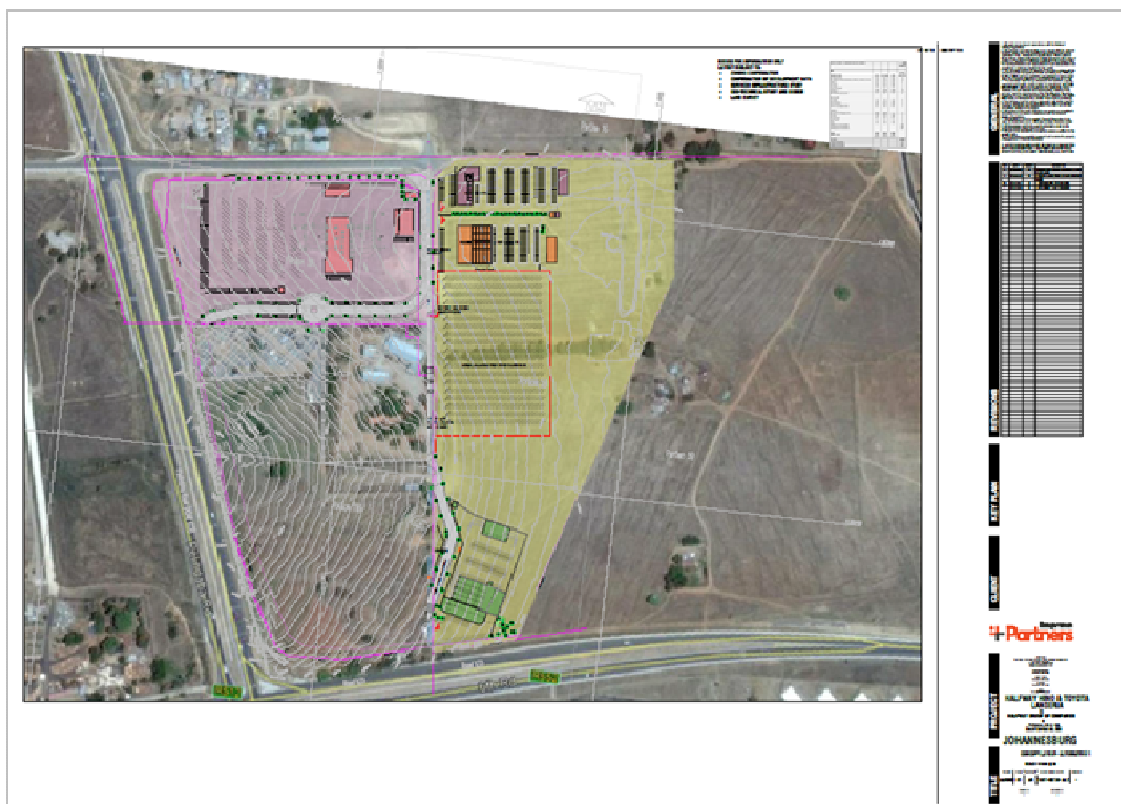


Figure 7-2: Alternative Layout

7.2 No-Go Alternative

As standard practice and to satisfy regulatory requirements, the option of not proceeding with the project is included in the evaluation of the alternatives.

The main implication of the No Go Option is that should the development not proceed, there will be a loss of the economic benefits of the investment of approximately R80 million in the area. There will also be a loss of the 80 construction related employment opportunities and 50 operation related employment opportunities.

Furthermore, with the No-Go option, the site will remain vacant and its current degraded and disturbed state.

Lastly, should the No-go Option be selected, the objectives of both the GSDF and Region A Regional Spatial Development Plan will not be met on the specific property. Further, there will be a loss of positive benefits associated with the development including the general improvement of the area, improvements related to services and increases in the local economy. Therefore, from a needs perspective, the No-go option is NOT preferred.

7.3 Environmental Impact Statement

4 Wheel Drive Property Holdings (Pty) Ltd proposes to develop and operate facilities for showing, servicing, rental, parking, washing, preparation and administration of vehicles on Portion 59 of the Farm Bultfontein 533 JQ. The relevant services, roads and complementary uses will also be put in place. Sufficient parking will be provided and the site will be landscaped with indigenous trees, shrubs and plants. In addition, a borehole will be used to supplement municipal water supply. Grey water recycling from vehicle wash bays will take place and sewer will be stored in a conservancy tank and collected weekly.

Due to required abstraction as well as the disposal of the sewage to several conservancy tanks, a number of activities in terms of Section 21 of the National Water Act (NWA) (Act No. 36 of 1998). These include:

21(a): taking of water from a water resource; and

21(g): disposal of waste in a manner that may detrimentally impact on a water resource.

A Baseline Geohydrological Assessment was undertaken to better understand the impact of proposed groundwater use. The study noted that the recommended abstraction rate for the borehole on site is 0.45 L/s, based on a pump schedule of 12 hours. It also however noted that the current abstraction rate is less than 0.02 L/s (or 560 L/month) and the drawdown extent (of less than 0.1 m) will be limited to 80 m. Potential groundwater related impacts are expected to be insignificant with regard to the shallow weathered and fractured aquifers, unlikely to impact third party groundwater users and unlikely to impact groundwater contribution to baseflow.

In addition, a number of technical studies are also included:

- Water and Sanitation Study;
- Stormwater Management Plan; and
- Traffic Impact Assessment.

A detailed impact assessment has been undertaken and assessed the types of impact, duration of impacts, likelihood of potential impacts as well as the overall significance of the impact occurring as part of the Basic Assessment Report. Most impacts have a low significance once mitigation measures were applied.

In addition, a detailed Environmental Management Programme (EMPr) has been compiled and is included in Annexure 10.8. Mitigation measures recommended by the specialists as well as best practice measures have been included in this document which must be implemented.

Based on the findings of the specialist studies and impact assessment and taking into account the successful implementation of the EMPr, it is felt that the **Proposal should be authorised.** The reasons for this opinion are as follows:

- The proposal involves the development of the truck dealership along Pelindaba Road and thus maximises the socio-economic potential of the proposed development through improved visibility.

8 PUBLIC PARTICIPATION

Public Participation has been conducted in line with the Regulations regarding the Procedural Requirements for Water Use License Applications and Appeals (R. 267 of 24 March 2017). All public participation has been integrated with the Basic Assessment Report. A public participation report has been compiled and is included in **Annexure 10.7**.

9 CONCLUSION

Based on the findings of the specialist studies and impact assessment and taking into account the successful implementation of the EMPr, it is felt that the **Proposal should be authorised**. The reasons for this opinion are as follows:

- The proposal involves the development of the truck dealership along Pelindaba Road and thus maximises the socio-economic potential of the proposed development through improved visibility.

The following are recommended conditions for inclusion in the WUL:

- As required by the Baseline Hydrogeological Baseline Assessment:
 - The recommended maximum abstraction rate for the borehole on site is 0.45 L/s, based on a pump schedule of 12 hours.
 - The existing borehole on site should be monitored for water levels and qualities. The following monitoring frequencies are recommended:
 - Water levels: Monthly
 - Water qualities: Quarterly
- The stormwater management system included in the Stormwater Management Plan must be implemented and maintained;
- A grey water wash bay to recycle water from the vehicle wash bays must be put in place;
- Sand, oil and grease traps must be implemented as noted in the Stormwater Management Plan;
- As per the Water and Sanitation Services Study and the comments received from Johannesburg Water, municipal water supply should be supplemented by abstraction from the existing borehole;
- The sewage conservancy tank must be installed and maintained according to its specification;
- The requirements of the Traffic Impact Assessment must be implemented.
- Construction must be undertaken in line with the requirements of the WUL, EA and EMPr.
- The Licensee must conduct an annual internal audit on compliance with the conditions of license. A report on the audit shall be submitted to the Provincial Head within one month of the finalization of the audit.
- The Licensee must appoint an independent external auditor to conduct an annual audit on compliance with the conditions of this license. The first audit must be conducted within 6 (six) months from the date of commencement of construction activities on site. The report on the audit shall be submitted to the Provincial Head within one month of finalization of the report.
- The Licensee shall notify the Department of the commencement of activities.
- Any incident that causes or may cause water pollution must be reported to the Provincial Head or his/her designated representative within 24 hours.

10 ANNEXURES
