COMMENT AND RESPONSE REPORT

SUPPORTING THE

DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED HUDDLE TOWNSHIP DEVELOPMENT

Prepared for:

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Submitted to:

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Table 1: Summary of Comment and Responses

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 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. 	 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. 	 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. 	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 affect 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. 	• F-3.1.4				
Loss of Open Space						
 I&APs commented that the development will result in the 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 the CoJ Open Space Framework. 	 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 Draft EIR will address the CoJ's Open Space Framework. 	• F-5.1.1				

SUMMARY OFCOMMENTS RAISED	SUMMARY OF RESPONSES PROVIDED	SECTION OF DRAFT EIR				
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.	• 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-4				
SOCIAL ENVIRONMENT & 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				
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 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. 	 C-1 C-2 C-3 C-4 				

SUMMARY OFCOMMENTS RAISED	SUMMARY OF RESPONSES PROVIDED	SECTION OF DRAFT EIR
	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 Comment and Responses – DRAFT SCOPING REPORT

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
	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
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
Mr Davidon stated that this is one of the last remaining wetlands in the country.	Mr Wayne Davidon (Resident)	16/10/2012 by fax		wetland system (valley bottom with a channel wetland) is not located where 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	•	Draft EIR phase of this application process to confirm the eastern most edge of the Hillslope Seepage feeder wetland. Thus, no development will take place on the feeder or main wetland as it is not located where the proposed development is to be established. All stormwater generated by the proposed development will be attenuated on site, within the open space areas proposed within the proposed development. The potential to partially attenuate storm water on the neighbouring golf course may be considered, and subject to agreement by the lessee and the local authority, this proposal may be taken further.
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.

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
 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 proposed township development will be attenuated on site as required 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
	C	oncerns with regards to P	Pollution
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.

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
	Conce	rns with regards to Fauna	
 Ms Assimacopoulos is concerned about wildlife on site. Mr Kretzmer would like all aspects pertaining to the environment (like birding, fishing etc.) to be considered during the S&EIR phase. 	Ms Alys Assimacopoulos (Resident) Mr Max Kretzmer (Resident)	4/09/2012 by e-mail and 16/10/2012 by e-mail 25/09/2012 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 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 are the
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	areas most attractive to bird life and fauna.
• 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	
• Ms 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.	Ms Ray 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	

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	Conce	rns 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	
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.

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
• 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. The proposed development has also made provision for open space areas
 Ms 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. Ms 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. Ms 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. 	Ms Ray 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.

 COMMENT RAISED Ms Newstadt feels that Huddle Park is a area and a green space for the whole Jo She feels that it is a public space and si developed and should not be sold off corporation for profit. Mr Maree feels that there is most likely g huge environmental impact on Huddle P 	oing to be a Mr Pierre Maree	DATE & METHOD OF COMMUNICATION 26/10/2012 by e-mail 26/10/2012 by e-mail	RESPONSE
widely regarded as our local green lung.			
They expressed concern over the extra w and electricity demands that will be pl already over-burdened system through a de	ater, sewage Mr Daryl Fuchs (Save aced on an Huddle Park Community	ards to pressure on Service	 Infrastructure 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 electric that there will be a huge burden placed which is already prone to blackouts. He indicated that the water and sewerage also already under pressure. 	on an area (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 to provide an alternative (green) to coal generated electricity, thus
 Ms Nel is concerned about the extra rec water, electricity and sewerage on an a burdened system. 		22/10/2012 by e-mail	 reducing the increased demand on Eskom supplies. The local municipality will confirm capacity for water and sewer connections to existing infrastructure – these confirmations and/or
 Ms Wolder believes that a potential 500 res will add extra pressure on the city's a burdened electricity supply grid. 		22/10/2012 by e-mail	 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 site, within the open space areas proposed within the proposed development.
 VBGD TP stated that development of increase demands on engineering service which include water, sewer, electricity and and that it will be necessary to show that th can be supplied to the development, without or negatively influencing existing supply to the school. 	s in general, storm water sese services but disrupting	26/10/2012 by e-mail	 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.

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 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	erns 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)		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 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. VBGD TP feels that aspects such as the positioning of 	Ms Erica du Plessis (Resident)		 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. A detailed Traffic Impact Assessment (TIA) is underway, which will be made
access, parking and the like need to be carefully planned and assessed.			available for review and consideration in the Draft EIR. The TIA will assess all impacts relating to traffic volumes, access and parking.

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
	Concerns wit	th 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	
• 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	 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
• Ms Laserson suggested that a proper traffic impact assessment be conducted in the area and in the surrounding area.	Ms Marian Laserson (Resident)	22/09/2012 by e-mail	which road network upgrades are required and the timing thereof.
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	 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
Ms Francis stated that traffic in the area is a problem.	Ms Dulcie Francis (Resident)	16/10/2012 by fax	which road network upgrades are required and the timing thereof.

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
• 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	
 Ms 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. Ms 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. 	Ms Ray Wolder (previous ward councillor)	22/10/2012 by e-mail	
• 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	
 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	

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
 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 Comme	rcial 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 interacted and effected parties will have the construction to the
• 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.
 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 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 kilometers north, 2. Linksfield centres, and small retail shops in Sandringham). VBGD TS P states that, as shown on the proposed site Linksfield and Civin/Club Ave, which is directly adjacent to the school. According to VBGD TP these components of the development has sociated with shopping centres such as advertising and hoardings, Ighting, Ielecommunications etc. need to be suitably controlled so as not to detrimentally affect the surrounding properties. 	COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
	 another mall so close to Greenstone, Balfour and East Gate. Ms 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). 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 	(Resident) Ms Ray Wolder (previous ward councillor) VBGD Town Planners on behalf of the SAHETI	22/10/2012 by e-mail	 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

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
	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	 by the proposed development. 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	nental 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.

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
 Ms Motshegwa requested more information on the SEF process to inform residents via a newspaper article. According to Ms Motshegwa many readers have been ringing the newspaper with questions regarding the proposed development and the public participation process (PPP). 	Ms Lesego Motshegwa: (North Eastern Tribune – News Editor)	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, 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.). 	Dr Peter Gubb (Resident)	18/09/2012 by fax	• 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
 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 considered to have done a meagre job on the 2005/2007 EIA and the same should not be repeated. 	Ms Marian Laserson (Resident)	22/09/2012 by e-mail	 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. SEF will endeavour to facilitate a transparent and consultative public participation process through the S&EIR process. The legislation clearly
Mr Kretzmer enquired as to how inclusive the public participation process is.	Mr Max Kretzmer (Resident)	25/09/2012 by e-mail	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
Ms Wolder hopes that she may have the opportunity to debate and add more at a public participation meeting.	Ms Ray 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.

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
		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.

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
 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 associate infrastructure. Cognisance of the market prices in the area has been considered during detailed assessment of the characteristics of the property and its surround and a conceptual urban design and planning process. The applicant believe that the proposed urban design reflects a sensitivity towards encroachment on the surrounding suburbs and that the proposed development will reflect urrent 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? 	MS Tonia Yiannoulakis On behalf of the SAHETI School	16/10/2012 by e-mail	 A1: Huddle Investments (Pty) Ltd has commenced with the Environment Application and Public Participation Processes. They have also started with the Town Planning process, and expect to lodge the Town Planni Application by the end of 2012 or early 2013. Prior to construct commencing a number of approvals needs to be obtained, including the Environmental and Town Planning Authorisations to proceed. They 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 design Huddle Investments has previously communicated their willingness to present their plans in an informal meeting. A3: The current proposal includes approximately 314 single residential stant (i.e. single dwelling homes); 40 residential 2 properties (i.e. duplex type to houses); and 110 residential 3 units (i.e. 2, 3 & 4 storey apartments). In to approximately 464 "homes" are planned for the property. A4: The applicant is applying for approximately 10,000 sqm of gross lettal area for the community orientated retail component. It is anticipate that the store of the community orientated retail component.

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
 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 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? 			 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. The retail component will be driven by a 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 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. Mr & Ms Da Silva strongly object to any development in the Huddle Park vicinity. 	Stan Klaff (Resident) Mr & Ms Da Silva (Residents)	22/10/2012 by e-mail 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). 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 	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.

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE		
developed on the corner.					
• 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. 		
	Interest	in Investment Opportunity	/		
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			
Inputs 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 	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; 		
regulations 2010 (including proof of site notice, newspaper advertisement, notification of I&APs and			 Traffic Impact Assessment; and Wetland Delineation and Functional Verification Assessment. 		

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
 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 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. 			 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 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.
	Adı	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 ending 7 September). 	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. Mr Stillerman was added to the Registered I&AP Database.

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
 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	• A CD containing the Draft Scoping Report, including the Wetland and Heritage Reports, was posted to Prof. Grossman on 11/09/2012.
 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.

Table 3: Detailed Comment and Responses – FINAL SCOPING REPORT

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE			
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 have been considered through the various specialist studies and the assessments 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 have been considered through the various specialist studies and the assessments is 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 have been considered through the various specialist studies and the assessments is 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 have been considered through the various specialist studies and the assessments is 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 have been considered through the various specialist studies and the assessments is included in the DEIR.			

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
 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 have been considered through the various specialist studies and the assessments is included in the DEIR.
	Concerns with regards t	to 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, 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	IVIRONMENT	
	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
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).
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.	Concerns with regards to pr	essure on Service Infrastruct	
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	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
			proposed neighborhood.
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.	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.
	SOCIAL ENVIRONMEN	T & GENERAL CONCERNS	
	Concerns with re	gards to Public Health	
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.	Denny Rademeyer	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.

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
Concerns with reg	ards to the Environmental A	pplication Process (including	Public Participation)
Unconvinced that a proper detailed ecological, traffic or town planning study has actually been undertaken by experts or the 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.	A.R. Economacos	27/02/2013 by email to GDARD	The detailed studies are only undertaken and presented during the Environmental Impact Reporting (EIR) Phase of the EIA process – as 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 proposed development. Refers to Linksfield North and to a portion of Llinksfield 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 The knock-and-drop did not go into Bedford Park, which also relies on Club Street for access. 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 	Marian P Laserson	20/02/2013 by email to GDARD	 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

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
 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. 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 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. 			 proposed project with them and those who indicated they would appreciate inclusion within the EIA process have been captured within the I&APs database. SEF has included Councillor Margaret Radebe on the I&APs 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.
 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. 	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.

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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 first with respect to change in land use, before any building and town planning scheme approvals.			
 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 I&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 I&APs with SEF and to criticise the report and to object to the development on any of the grounds listed. 	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).
Lack of meaningful communication by SEF and Investec Properties. The meeting held at the Royal Johannesburg Golf Course on 19	Pierre Maree (for and on behalf of Dean Wallace)	20/02/2013 by email to GDARD	The meeting held at the Royal Johannesburg Golf Course was not facilitated by SEF and was not part of this EIA process.

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
November 2012 was of a very superficial nature. 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 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.			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.
 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.	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

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
Queried the length of the review period and why not allow people two months to comment.			review the reports at the library or the information within the main Report is not sufficient.
			The SEF website only allows documents under 2MB to be uploaded – the website host many, many projects hence the need to 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	I 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:	Ivo Varanini	13/10/2012 by Comment	The applicant purchased approximately 53 hectares of land at Huddle

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE	
Would like to know what the ground for the development was sold for.		Sheet via email to SEF. Followed up on 10/05/2013.	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: 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. 	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.	
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.	
General				
The professional qualifications of Mr Dave Rudolph and Ms Vici Napier have not been stated. Could these please be provided for the	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.	

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
benefit of I&APs.			
 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 all the specialist studies will then be submitted for review and comment for a minimum period of 40 calendar days – I say 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
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	commit to a date yet. Comment noted.

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE		
Administrative 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.	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.		
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 Sandringham Library.					
Requested registration as an I&AP and requested CD of all relevant information to be posted to the address provided.	Shan Holmes	06/02/2013 by email to SEF	Registered on the project's database and CDs posted to the postal addresses provided.		
	Carol Lewin	12/02/2013 by email to SEF			
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.		
Requested to be registered as an I&AP.	Arthur Barnwell	19/02/2013 via SEF website	Registered on the project's database.		
	Stanley Howard	28/02/2013 via SEF website			
	Oscar Cowan	19/02/2013 via SEF website			
	Jack Leslie Cooper (Ward Councillor for Ward 74)	04/03/2013 by SEF website registration			

COMMENT RAISED	INTERESTED AND AFFECTED PARTY	DATE & METHOD OF COMMUNICATION	RESPONSE
	Pam Turner (Indo Jet Travel)	21/06/2013 via email to SEF	