

SOCIAL IMPACT ASSESSMENT REPORT
THE PROPOSED HUDDLE TOWNSHIP DEVELOPMENT

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Declaration of Independence

I, **Kelly Alexander**, in my capacity as a specialist consultant, hereby declare that I -

- Act as an independent consultant;
- Do not have any financial interest in the undertaking of the activity, other than remuneration for the work performed in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998);
- Have and will not have vested interest in the proposed activity proceeding;
- Have no, and will not engage in, conflicting interests in the undertaking of the activity;
- Undertake to disclose, to the competent authority, any material information that has or may have the potential to influence the decision of the competent authority or the objectivity of any report, plan or document required in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998);
- Will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not;
- Based on information provided to me by the project proponent, and in addition to information obtained during the course of this study, have presented the results and conclusion within the associated document to the best of my professional judgement;
- Reserve the right to modify aspects pertaining to the present investigation should additional information become available through ongoing research and/or further work in this field; and
- Undertake to have my work peer reviewed on a regular basis by a competent specialist in the field of study for which I am registered.

Kelly Alexander
MA Development Sociology.
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Date

EXECUTIVE SUMMARY

INTRODUCTION

Strategic Environmental Focus (Pty) Ltd (SEF) has been appointed by Huddle Investments (Pty) Ltd to undertake a Social Impact Assessment (SIA) for the proposed Huddle Development situated on Portion 84 (a portion of the remainder) of the Farm Bedford 68 IR, Linksfield, City of Johannesburg Metropolitan Municipality (CoJMM), Gauteng Province. This study forms part of the Environmental Authorization process, in terms of the Environmental Impact Assessment (EIA) Regulations promulgated in terms of Chapter 5 of the National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998).

The purpose of this Social Impact Assessment (SIA) is to provide information regarding the potential impacts that the proposed development may have on the social environment of the affected area. This SIA supports and provides critical input into the environmental application in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA). The aim of the SIA is to ensure that the social context is considered and potential impacts affecting the social environment are understood and assessed in order to ensure an informed decision is made by the Competent Authority (in this instance, the Gauteng Department of Agriculture and Rural Development (GDARD)) in terms of issuing an Environmental Authorisation for the proposed development.

This report has been reviewed internally within SEF by Ms Jessica de Beer, as senior social scientist with 8 years' experience in the social and environmental impact assessment field. In order to ensure objectivity and independence, this SIA has been externally peer reviewed by Jessica De Beer.

BRIEF PROJECT DESCRIPTION

Huddle Park Golf Club is located on a portion of the Farm Bedford 68 IR and used to form part of two eighteen hole public golf courses covering a total area of approximately 183 hectares. Huddle Park is located in the eastern part of the CoJMM next to the Royal Johannesburg Golf Course and in close proximity to Sandringham, Sydenham and Linksfield, which fall within the CoJMM and Bedford Park and Senderwood which falls within the Ekurhuleni Metropolitan Municipality. Huddle Park is one of the largest remaining open spaces in the urban area of the CoJMM, but it is underutilised in terms of its potential as a centrally located undeveloped portion of land (Figure 1).

The proposed Huddle Development will primarily consist of residential houses, a small percentage of cluster and higher density apartments, a small retail centre, with a maximum floor area of 10 000m², a private open space system, for the exclusive use of residents, which includes pedestrian linkages with the Huddle Park Golf Club, and a private road system. The total area of the development is approximately 53 hectare (ha). The proposed site currently lies adjacent to the existing Huddle Park Golf Course.

METHODOLOGY

The methodology proposed for the SIA was that of a qualitative approach, by way of in-depth interviews with key stakeholders within the local community. This approach based on the fact that the concerns raised by the community are largely affective and not directly measurable. Interviews allowed for the in-depth understanding of concerns raised and facilitated the ranking of these concerns. During the analysis of findings, a quantitative measure was applied in order to place concerns in their perceived order of importance.

CONCLUSIONS AND RECOMMENDATIONS

A wide variety of issues and concerns has been identified through the SIA. These are diverse in nature and extend from broad environmental issues such as public open space – which are difficult to quantify and measure; to issues such as traffic, noise and dust impacts which are more measurable.

There will be a number of areas in which mitigation will be required during the construction phase. These include noise and dust, and the impact that the construction vehicles will have on the traffic. There is also a concern regarding the effect that the influx of workers to the area will have on crime in the neighbouring areas.

The loss of community and open space, with the associated impact on the community's sense of place is an issue that has been highlighted throughout. This will be the result of the altered visual nature of the area. This is in terms of the loss of trees and open space, as well as the impact the construction of the housing and retail centre will have on the community.

The schools will be temporarily affected by the increased traffic, which will heighten the congestion issues they already face. However, they stand to benefit from the increased number of school going families in the area, and from the potential for staff housing in the residential component of the estate as well as potential for additional parking. In terms of the schools, it is important to seek creative solutions to ease their traffic congestion. This will also provide a safer environment for the school children. It may also assist the developer to be seen to be more socially responsible in the community. What has been a largely adversarial relationship between the developer and community should be redefined and a mutually beneficial solution should be sought, should the development go ahead. This could be achieved through a forum in which the parties engage with each other, and are able to exchange ideas. Importantly, the provision of the necessary information regarding the legality of the transaction is vital to ensuring that this is possible.

The impact on the current traffic situation in the area is of concern, as Club Street is a major regional road and is already highly congested. The impacts on traffic are predicted to be significant and adversely affect a large number of people – beyond the immediate community. This is due to the large number of commuters who use this route. There needs to be greater clarity on issues such as the timing for the various mitigation measures – notably the traffic mitigation. It is also vital to establish whether the mitigation measures proposed are comprehensive enough for a problem that appears to be a significant issue at present. Furthermore the mitigation measures must necessarily be able to be implemented and thus be appropriate and achievable, as well as being able to be monitored.

As well as the impact on roads, and requirement that they be upgraded in order to manage the impact of the development, there is a concern that the rest of the infrastructure will also be put under strain. There are large maintenance backlogs and existing incidents of burst pipes which are an area of concern. This may represent a fatal flaw if the infrastructure is simply unable to cope with any additional impact and development. As the land is currently zoned as public open space, it is unlikely that substantial upgrades to infrastructure have been planned for the area by either CoJMM or the EMM.

Based on the impacts identified and the measures that could be implemented to mitigate (or enhance) these impacts, it is suggested that the proposed project proceed under the following conditions (discussed in detail under Section 9):

- Interaction with existing community forums
- Labour recruitment should be local
- Crime and violence must be monitored and managed
- Local economy to be developed
- Continuous Consultation
- Addressing impacts related to unwanted social behaviour
- Transfer of skills
- Addressing issues regarding to need and desirability
- Addressing issues related to increased pressure on infrastructure, including traffic

In general, during construction, mitigation is required to ensure that the adjacent properties are well informed of the proposed development so that uncertainties, and perceptions regarding increasing crime levels, etc are dealt with. Furthermore, in order to enhance the positive impacts of this development during operation, it is relevant to note that the success of the proposed development is dependent on good management. Should the development be untidy, not well maintained and unable to attract potential investors to the area, the likelihood of positive impacts will diminish.

The monitoring of the development by maintaining it in the form of provision of supplementary services that include safety and security patrol officers, pavement cleaning, litter collection, maintenance of public space, removal of illegal posters and etc, would promote the good functioning of the development. It is suggested that, in the interest of the adjacent property owners, controlled access and usage of the open space be permitted.

Finally the mitigation measures highlighted throughout the document should be implemented and, where this does not occur, it is necessary to reassess the impact on the community and environment. The mitigation measures effective implementation is vital in ensuring that the project does not lead to adverse effects, should the project proceed.

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LIST OF ABBREVIATIONS AND ACRONYMS

COJMM	City of Johannesburg Metropolitan Municipality
DSV	Dunvegan Security Village
EMM	Ekhuruleni Metropolitan Municipality
HEAD	Huddle Environs Anti-Degradation League
IES	Ixhaphozi Enviro Services
JMPD	Johannesburg Metro Police Department
JMOSS	Johannesburg Metropolitan Open Space System
KDLS	King David Linksfield School
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998)
NGO	Non-Governmental Organisation
SDF	Spatial Development Framework
SEF	Strategic Environmental Focus (Pty) Ltd
SLCAP	Senderwood, Linksfield Community Active Patrol
TIA	Traffic Impact Assessment
VIA	Visual Impact Assessment
WEF	World Economic Forum
WOM	Without Mitigation Measures
WM	With Mitigation Measures

1 INTRODUCTION

Strategic Environmental Focus (Pty) Ltd (SEF) has been appointed by Huddle Investments (Pty) Ltd to undertake a Social Impact Assessment (SIA) for the proposed Huddle Development situated on Portion 84 (a portion of the remainder) of the Farm Bedford 68 IR, Linksfield, City of Johannesburg Metropolitan Municipality (CoJMM), Gauteng Province. This study forms part of the Environmental Authorization process, in terms of the Environmental Impact Assessment (EIA) Regulations promulgated in terms of Chapter 5 of the National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998).

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2 BRIEF PROJECT DESCRIPTION

2.1 *Locality*

The proposed Huddle Development (approximately 53 ha in extent) will be situated on a portion of the existing Huddle Park Golf Course (Figure 1 and Appendix 1), i.e. on the proposed Portion 84 (a portion of the remainder) of the Farm Bedford 68 IR, Linksfield, City of Johannesburg Metropolitan Municipality (CJMM), Gauteng Province.

In general terms the site is located adjacent to and to the west of Club Street and at its intersection with Linksfield Road, to the west of Senderwood, to the east of the Royal Johannesburg Golf Course and to the south of the Sandringham High School (Figure 1).

The sites central co-ordinates are: 26° 08' 54.05" S and 28°07' 19.64" E. The site is currently zoned as public open space. Access for the present Huddle Park Golf Course is obtained from Club Street.

2.3 Surrounding Land Use

To further place the site in context, the land uses within all four major compass directions that immediately surround the proposed development (or site) are described in the Table 1 below.

Table 1: Surrounding Land Use Table

Direction	Land Use	Distance (m)
North	Club Street (4 lane main road)	Boundary of the site
East	Club Street (4 lane main road)	Boundary of the site
South	Huddle Park Golf Course and Club House	Boundary of the site
	Club Street (2 lane main road)	Boundary of the site
West	Remainder of Huddle Park Golf Course	Boundary of the site

Some medium density residential developments, dwelling houses, the Saheti School and a filling station are located further to the east of and across that section of Club Street to the south of its intersection with Linksfeld Road.

A plant nursery, a small shopping centre and the Sizwe Tropical Disease Hospital on a large farm portion to the north east and across that section of Club Street to the north of its intersection with Linksfeld Road. The site is located approximately 700 metres from the hospital.

Part of Huddle Park Golf Course, Sandringham High School and Sandringham residential area are located further to the north west of the site, while another part of the Huddle Park Golf Course, Royal Johannesburg Golf Course and the low density residential township of Linksfeld North are located further to the west and south west of the site. Huddle Park Golf Course, sports fields and the business and high density residential developments of Linksfeld Extension 3 Township are further located to the south west of the site.

2.4 Details of the Project

2.4.1 Proposed Township Development

The proposed Huddle Development (approximately 53ha in extent) provides for this portion of land to be developed for a residential estate, a small neighbourhood node that will consist of retail facilities, some offices and a component of higher density residential apartments and a public and private road system (Table 2).

Table 2: Details of the Proposed Huddle Development (refer to Figure 3 and Appendix A)

Residential Category	Approximate footprint area (ha)	Description (number of units, size, density, etc.)	Location within the proposed Huddle Development (estate)
Residential 1	24.7 ha	314 units (or erven) between $\approx 450\text{m}^2$ and 1000m^2 (average of 800m^2). 2 Storeys (provided that a storey that does not protrude above natural ground level at the highest point of the site on which the dwelling house is located, shall not be regarded as a storey). Coverage: Single storey = 60%; and Double storey = 50%.	Throughout the proposed estate – main feature of the estate.
Residential 2	0.82 ha	Two small cluster developments. 2 storey's in height. Coverage = 60% Total of 33 units (density of 40 units/ ha). Access from the proposed 25m public road.	Interface between the existing Huddle Park Golf Course clubhouse (to the south) and the "Residential 1" component (to its north). Interface between the proposed Clubhouse and maintenance facilities and the "Residential 1" component.
Residential 3	1.38 ha	110 units (density of 80 units/ ha). 3 and 4 storey residential apartments. Coverage = 70%, remainder is parking. Access from the proposed 25m public road.	North of the proposed Neighbourhood Node. Just north of the intersection of Club Street with Linksfield Road.
Neighbourhood Node	4.80 ha	Maximum gross leasable area of $10\,000\text{m}^2$. Access from the proposed 25m public road. Provision is also made for the proposed retail/business node to obtain direct access from Club Street at one access point.	Located at the intersection between Club Street and Linksfield Road where the high activity land uses will have the least impact on existing lower density residential developments in the vicinity.
Public/Private Road System		Road reserve widths vary between 16 – 30m to provide access to the various components within the proposed estate. Proposed estate access is a 25m wide public road that intersects at both ends with Club Street.	Throughout the proposed estate.
Open Space System		Clubhouse and maintenance facilities at one of the entrances to the proposed estate. Provides for pedestrian linkages within the proposed.	Throughout the proposed estate.

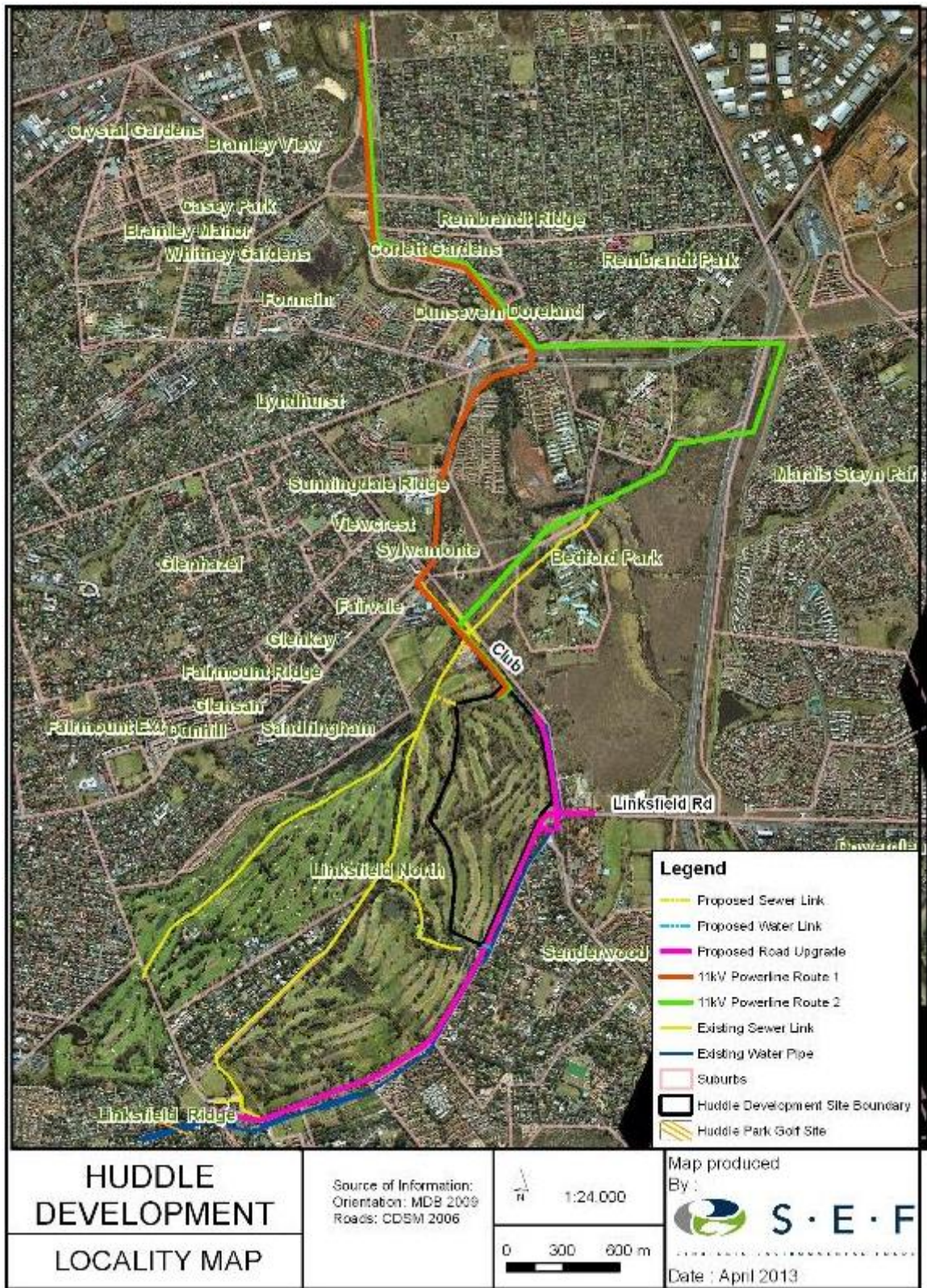


Figure 1: Huddle Development Locality Map

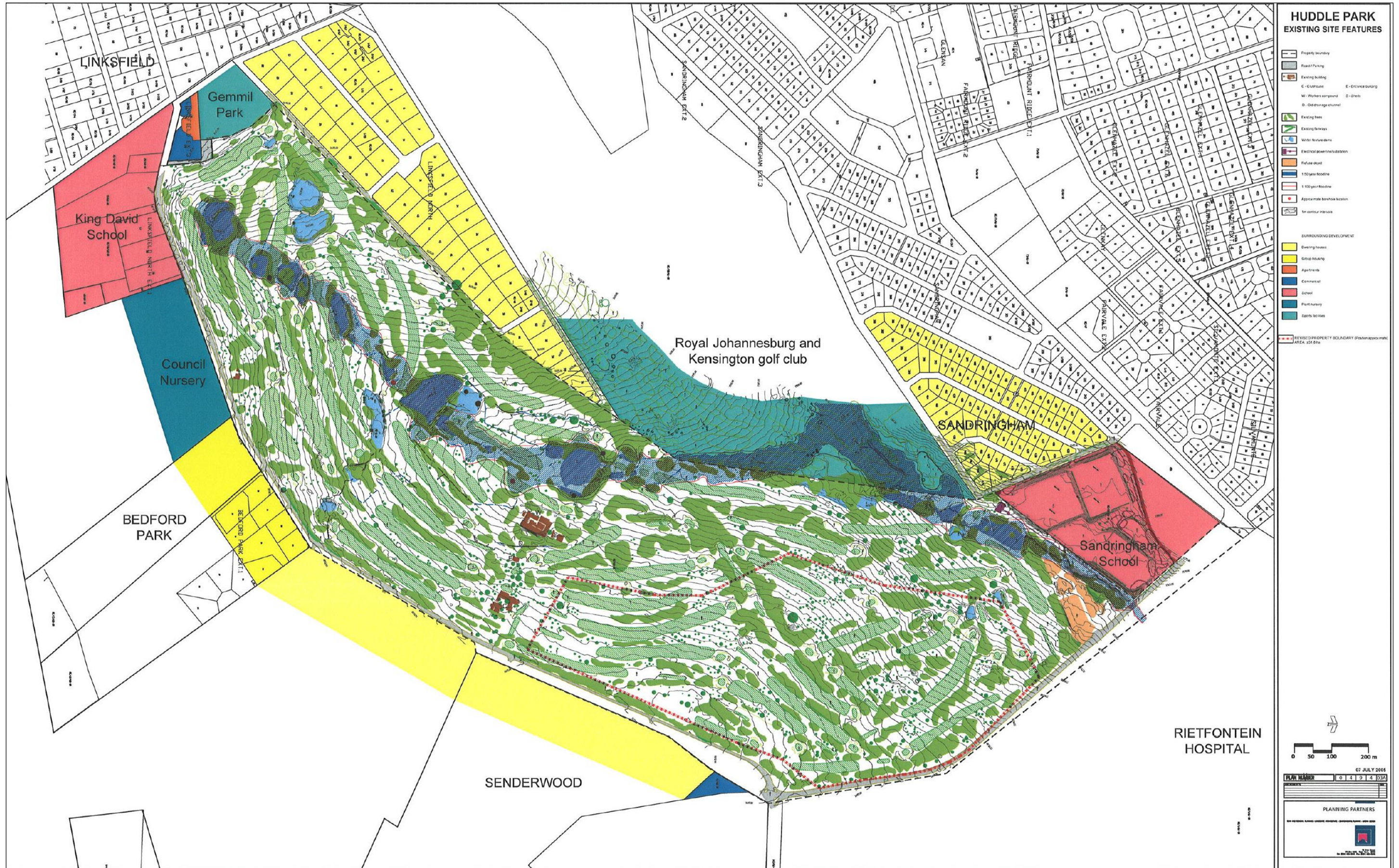


Figure 2: Features of the Huddle Park Golf Course and the proposed Huddle Development Footprint

Neighbourhood Node:

The proposed Neighbourhood Node provides for:

- Food outlets, such as outdoor coffee bars, food bistros and a variety of internationally and locally themed quality restaurants which will create ambience and a social setting.
- Essential day to day needs, such as a speciality grocery store, food stores and delis, a Postnet, banking facilities, internet cafes, a domestic hardware store, hairdressers and other business uses that are associated with a retail development and that are required to serve the needs of the community.
- Appropriately scaled offices targeted at small and medium size businesses. Their presence will reinforce the mixed use nature of the development.
- A lifestyle component that could include a plant nursery, a crèche and a nursery school.
- The height of the development is limited to a maximum of 2 storeys, excluding basements. Due to the slope in the land, a building that is 2 storeys in height on the Club Street side of the development could be 3 storeys in height on the western side of the development. It is therefore proposed that a storey that does not protrude above natural ground level at the highest point of the erf should not be regarded as a storey. Provision is also made for offices to be 3 storeys in height.
- Access to the proposed development will be obtained from the proposed 25m public road that intersects with Club Street at two points. The spacing of intersections on Club Street complies with accepted traffic engineering standards.

2.5 Details of the Construction Phase

The appointed Contractor will be responsible to prepare a Construction Site Development Plan prior to establishing on site. This plan will indicate the boundaries of the site that encompasses all construction related activities, vehicle and pedestrian access points, laydown area/s, offices, stockpile areas, storage areas, ablution facilities, etc. This Site Development Plan must be approved by the appointed Environmental Control Officer (ECO) as provided for within the Environmental Management Programme (EMPr).

Figure 3: Proposed Huddle Development Layout Plan



Table 3: Project Summary

PROJECT SUMMARY																						
Project Name	Huddle Township Development																					
Farm Name and Portions	Proposed Portion 84 (a portion of the remainder) of the Farm Bedford 68 IR, Linksfield, City of Johannesburg Metropolitan Municipality (CJMM), Gauteng Province (refer to Figure 1).																					
Surveyor-General 21 Digit Code	TOIR0000000006800000																					
Brief Development Overview	<p>The proposed Huddle Township Development (approximately 53ha in extent) provides for this portion of land to be developed for a residential estate, a small neighbourhood node that will consist of retail facilities, some offices and a component of higher density residential apartments and a public and private road system.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #92d050;">Residential Category</th> <th style="background-color: #92d050;">Area (ha)</th> <th style="background-color: #92d050;">Description (number of units, size, density, etc.)</th> </tr> </thead> <tbody> <tr> <td>Residential 1</td> <td>24.7 ha</td> <td>314 units (or erven) between $\approx 450\text{m}^2$ and 1000m^2 (average of 800m^2). 2 Storeys (provided that a storey that does not protrude above natural ground level at the highest point of the site on which the dwelling house is located, shall not be regarded as a storey). Coverage: Single storey = 60%; and Double storey = 50%.</td> </tr> <tr> <td>Residential 2</td> <td>0.82 ha</td> <td>Two small cluster developments. 2 storey's in height. Coverage = 60% Total of 33 units (density of 40 units/ ha). Access from the proposed 25m public road.</td> </tr> <tr> <td>Residential 3</td> <td>1.38 ha</td> <td>110 units (density of 80 units/ ha). 3 and 4 storey residential apartments. Coverage = 70%, remainder is parking. Access from the proposed 25m public road.</td> </tr> <tr> <td>Neighbourhood Node</td> <td>4.80 ha</td> <td>Maximum gross leasable area of $10\,000\text{m}^2$. Access from the proposed 25m public road. Provision is also made for the proposed retail/business node to obtain direct access from Club Street at one access point.</td> </tr> <tr> <td>Public/ Private Road System</td> <td></td> <td>Road reserve widths vary between 16 – 30m to provide access to the various components within the proposed estate. Proposed estate access is a 25m wide public road that intersects at both ends with Club Street.</td> </tr> <tr> <td>Open Space System</td> <td></td> <td>Clubhouse and maintenance facilities at one of the entrances to the proposed estate. Provides for pedestrian linkages within the proposed.</td> </tr> </tbody> </table>	Residential Category	Area (ha)	Description (number of units, size, density, etc.)	Residential 1	24.7 ha	314 units (or erven) between $\approx 450\text{m}^2$ and 1000m^2 (average of 800m^2). 2 Storeys (provided that a storey that does not protrude above natural ground level at the highest point of the site on which the dwelling house is located, shall not be regarded as a storey). Coverage: Single storey = 60%; and Double storey = 50%.	Residential 2	0.82 ha	Two small cluster developments. 2 storey's in height. Coverage = 60% Total of 33 units (density of 40 units/ ha). Access from the proposed 25m public road.	Residential 3	1.38 ha	110 units (density of 80 units/ ha). 3 and 4 storey residential apartments. Coverage = 70%, remainder is parking. Access from the proposed 25m public road.	Neighbourhood Node	4.80 ha	Maximum gross leasable area of $10\,000\text{m}^2$. Access from the proposed 25m public road. Provision is also made for the proposed retail/business node to obtain direct access from Club Street at one access point.	Public/ Private Road System		Road reserve widths vary between 16 – 30m to provide access to the various components within the proposed estate. Proposed estate access is a 25m wide public road that intersects at both ends with Club Street.	Open Space System		Clubhouse and maintenance facilities at one of the entrances to the proposed estate. Provides for pedestrian linkages within the proposed.
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Development Footprint	Approximately 53 ha (excluding associated infrastructure).																					
Additional Authorisations Required:																						
Water Use License	<p><u>National Water Act, 1998 (Act No. 36 of 1998) - NWA</u></p> <p>An unnamed tributary of the Jukskei River runs from south to north across the Huddle Park Golf Course property and is located, on average, approximately 200m to 300m to the west of the proposed Huddle Township Development site, save a small area of approximately $1\,109\text{m}^2$ in extent that encroaches into the 30m temporary wetland buffer at the south-western corner of the proposed development.</p> <p>Due to the gas, sewer and electrical connections crossing the tributary of the Jukskei River and associated wetland, and the overall proximity of the proposed development to the wetland, according to the NWA, the proposed development will trigger the following water uses listed in Section 21:</p> <p>(c) impeding or diverting the flow of water in a watercourse; and (i) altering the bed, banks, course or characteristics of a watercourse.</p> <p>Accordingly, the proposed Huddle Township Development will thus require a Water Use Licence (WUL), which is administered by the Department of Water Affairs (DWA).</p>																					
Permits for the Relocation of Protected Plants	A large number of <i>Hypoxis hemerocallidea</i> (African Potato - nationally classified as Declining and on GDARD's Orange List) was recorded throughout the northern section of the site with numbers at each																					

	locality ranging from 1 to 70 individuals. The specialist recommended that a permit is obtained from GDARD to relocate the plants to a suitable, grassland area in the near vicinity.
Confirmation of capacity to supply bulk services:	
Water (Construction & Operational Phases)	<p>Supplier: Johannesburg Water</p> <p>Approximately 783 kl (kilolitres) of water will be consumed daily by the proposed Huddle Township Development, resulting in a continuous demand of approximately 45.31 l/s (litres per second).</p> <p>A new connector line (200mm diameter, 1 380m long) from the Corner of Grant Road, along the Club Street servitude, to a connection point opposite Donne Avenue will be provided for the proposed development as the existing water pipeline in Club Street has been shown inadequate to supply the proposed development. The connection point is from an existing high pressure municipal supply line from the Linksfield reservoir and it is indicated that a connection, in Club Street, can be taken from an existing Scour Valve, through a pressure reducing valve, to connect into a proposed 200mm diameter link pipeline, which will be piped jacked under Club Street and the reticulation of the township will be fed from a single point.</p>
Sewage (Construction & Operational Phases)	<p>Supplier: Johannesburg Water</p> <p>The proposed development will be served by waterborne sewerage, observing Johannesburg Water's standards throughout. It is estimated that the daily flow of effluent from the township will be approximately 608kl. Peak flow is based on 80% of peak water demand and is estimated at 35.19m/s.</p> <p>There is a major existing sewer main 1 500mm diameter pipeline located in the valley to the west of the proposed development. This sewer is a major collector for the area and drains from south to north. A 200m pipeline with a diameter of 200mm will be required to transfer effluent from the north western corner of the proposed development to the existing sewer main. A servitude across the Huddle Park Golf Course will have to be registered and it is proposed that the sewer line be jacked under the wetland and associated watercourse to avoid the impacts associated with open trenching.</p>
Electricity (Construction & Operational Phases)	<p>Supplier: City Power</p> <p>The capacity required by the proposed development is as follows: Residential 1 = 1,548kVA; High Density Development = 365kVA; Neighbourhood Node = 1,000kVA; Total of 2,913kVA x0.85 Diversity Factor = approximately 2,500kVA.</p> <p>To supply the proposed development, 2 x 185mm² x 3c copper XLPE 11kV underground powerline cables will be installed from the corner of Pretoria and Modderfontein Road (where it connects into the existing powerline from the Alexander Substation located further to the north), south along Modderfontein Road, then east along Club Street, to a 6x3m site situated along the eastern boundary of the proposed development. From this point 2 x MV cables will continue to the Residential 3 component and Neighbourhood Node stands.</p>
Gas (Operational Phase)	<p>Supplier: Egoli Gas (Pty) Ltd</p> <p>Arrangements have been made with Egoli Gas for a connection to the existing Egoli Gas pipeline to the west of the proposed development. The proposed gas line (110mm diameter) crosses the wetland and associated watercourse to the west of the proposed development and will be jacked under this system to limit disruption as a result of trenching.</p>
Solid Waste (Construction & Operational Phases)	<p>Construction Phase: The Contractor will be responsible for the management and removal of all solid waste (refer to the Environmental Management Programme (EMP) in Appendix 8).</p> <p>Operational Phase: All waste (glass, plastic, paper) generated on site will be recycled as far as possible – managed by the proposed HOA. General waste, not recycled, will be collected on a weekly basis for removal by an appointed registered waste removal company or the Local Municipality.</p>
Stormwater Attenuation	<p>It is proposed that full attenuation of stormwater will be facilitated within the proposed development footprint. A large number of attenuation facilities have been proposed throughout the development's open space system. The "wet" ponds are estimated to cover approximately 13 000m², thus the attenuation required can therefore be accommodated in a freeboard of between 400-500mm depending on the locality and routing of stormwater flows. Attenuated stormwater will then be discharged into the surrounding Huddle Park Golf Course area. Stormwater attenuation within the Neighbourhood Node (retail/ business</p>

	<p>component) and Residential 2 and 3 components (i.e. cluster and apartment housing areas) will be provided by way of underground tanks sized at 2 200m³ and 620m³, respectively.</p> <p>The underground stormwater system will be designed to intercept the 1:5 year storm and routing of the 1:25 year storm will take place throughout the development and will be directed towards the attenuation facilities. The attenuation facilities will be designed to reduce the outflow from the entire development to the 1:5 year pre-development flow.</p>
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2.6 Project Alternatives

To give effect to the principles of NEMA and Integrated Environmental Management (IEM), an EIA should assess a number of reasonable and feasible alternatives that may achieve the same end result as that of the preferred project alternative. The following alternatives have been identified as part of this Scoping exercise:

Alternative 1: Electrical Route alternatives:

Currently there are two (2) route alternatives for the 11 kV underground powerline that will connect the proposed development to the Alexandra substation in the north. Both routes will be assessed during the EIR phase, if they both remain feasible. The City of Johannesburg and/or existing servitudes may dictate the preferred route.

No site alternatives exist for the proposed development.

Alternative 2: Layout/ Design alternatives:

The layout/ design plan has changed based on the proposed developments of the adjacent golf course. The original layout was amended based on the following:

- Consider more open space;
- Alternative stormwater attenuation open spaces;
- Greater variety of product for the market;
- To retain as many of the existing trees as possible.

The layout/ design plan may be further amended based on the alternatives being investigated for stormwater management.

Alternative 3: Technology alternatives:

Various technology alternatives may be considered and investigated during the EIR phase of the project. The various technologies that may be considered will have implications varying from cost to effectiveness to legislative acceptability. These are largely associated with energy efficient technologies to be implemented within the design of houses.

Alternative 4: No development alternative:

This option assumes that a conservative approach would ensure that the environment is not impacted upon any more than is currently the case. It is important to state that this assessment is informed by the current condition of the area. Should the GDARD decline the application, the 'No-development' option will be followed and the status quo of the site may remain.

2.7 Need and Desirability of the Project

The proposed development site is centrally located in relation to the metropolitan urbanised areas of the CoJMM and EMM and approximately 6km from Bedfordview Town Centre, 10km from O. R. Tambo Airport, 7km from the Central Business District (CBD) of Johannesburg and 8km from the Sandton CBD. The site is further located in close proximity to the N3 freeway (Eastern Bypass) / Linksfield Road interchange which provides excellent regional access to all parts of the metropolitan areas of Johannesburg and Tshwane and, via the R21 and R24, to Ekurhuleni and the O. R. Tambo Airport. Furthermore, unlike many other parts of the metropolitan area, first-rate east west routes exists which link the site to other major routes such as the M1 freeway and Louis Botha Avenue.

Thus, the site is located within easy driving distance of a large number of major places of employment including Johannesburg CBD, Sandton CBD, Bedfordview Town Centre, the industrial areas of Kempton Park, Edenvale and Germiston and the southern industrial areas of Johannesburg.

Further to this, the site is located in an established and stable residential urban environment consisting mainly of lower density residential developments on erven varying in size between 1000m² and 4000m², pockets of higher density residential developments and support land uses, such as a number of small shopping centres and a large number of schools (24 schools of different sizes located within 5 minutes driving distance of the site. This constitutes a high concentration of educational facilities compared to other parts of the metropolitan area).

According to market research, a relatively low level of residential growth is taking place due to the fact that the area is almost fully developed. However, the proximity to places of employment and amenities (such as shopping centres and schools) creates a strong demand for housing in the middle to upper income groups.

The area within which the proposed Huddle Township Development is located also lacks suitable convenience retail. Market research has indicated that a need exists for at least 5 000m² of retail floor area. To provide for other business uses that are normally associated with convenience retail facilities, a neighbourhood node, with a maximum floor are of 10 000m² is proposed.

The proposed development will have little or no impact on adjoining existing developments, as it is buffered from them by large open spaces (i.e. golf courses) and major roads.

4 LEGAL REQUIREMENTS

SEF has submitted an application for Environmental Authorisation (EA) with the GDARD for the proposed Huddle Township Development and received an official GDARD reference number: **Gaut 002/12-13/E0032**. The environmental legislation, guidelines and policies **applicable** to this project are as follows:

4.1 NEMA and the Environmental Impact Assessment Regulations

The EIA Regulations, promulgated under NEMA, focus primarily on creating a framework for co-operative environmental governance. NEMA provides for co-operative environmental governance by establishing principles for decision-making on matters affecting the environment, institutions that will promote co-operative governance and procedures for co-ordinating environmental functions exercised by State Departments and to provide for matters connected therewith.

In terms of the EIA Regulations of 2010 and activities listed in GN No. 544 and 546 (requiring a Basic Assessment process) and GN No. 545 (requiring a S&EIR process), the following listed activities are deemed by the EAP to be applicable to the proposed Huddle Township Development based on the information provided by the project proponent, the professional team and specialists.

It must be noted that activities requiring a Basic Assessment process, as well as activities requiring a S&EIR process are triggered by the proposed development. Therefore, according to the below listed activities, a situation arises, whereby the legal requirements of the activity listed in terms of GN No. 545 of 2010 supersede those of the activities listed in terms of GN No. 544 and 546 of 2010, and as such **this application has undergone a S&EIR process.**

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

The National Water Act, 1998 (Act No. 36 of 1998) (NWA) aims to provide management of the national water resources to achieve sustainable use of water for the benefit of all water users. This requires that the quality of water resources is protected as well as integrated management of water resources with the delegation of powers to institutions at the regional or catchment level. The purpose of the Act is to ensure that the nation's water resources are protected, used, developed, conserved, managed and controlled in responsible ways.

Of specific importance to this application is Section 19 of the NWA, which states that an owner of land, a person in control of land or a person who occupies or uses the land which thereby causes, has caused or is likely to cause pollution of a water resource must take all reasonable measures to prevent any such pollution from occurring, continuing or recurring and must therefore comply with any prescribed waste standard or management practices.

Due to the gas, sewer and electrical connections crossing the tributary of the Jukskei River and associated wetland, as well as the close proximity of the development as a whole, according to the NWA, the proposed development will trigger the following water uses listed in Section 21:

- (c) impeding or diverting the flow of water in a watercourse; and
- (i) altering the bed, banks, course or characteristics of a watercourse.

Accordingly, the proposed Huddle Township Development will thus require a water use licence, which is administered by the Department of Water Affairs (DWA). A water use license application will be undertaken for the proposed development.

4.3 Other Legal Requirements

4.3.1 Acts

Constitution of the Republic of South Africa

The Constitution of the Republic of South Africa has major implications for environmental management. The main effects are the protection of environmental and property rights, the change brought about by the sections dealing with administrative law, such as access to information, just administrative action and broadening of the locus standing of litigants. These aspects provide general and overarching support and are of major assistance in the effective implementation of the environmental management principles and structures of the NEMA. Section 24 in the Bill of Rights of the Constitution specifically states that:

Everyone has the right -

- To an environment that is not harmful to their health or well-being; and
 - To have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that -Prevent pollution and ecological degradation;
 - Promote conservation; and
 - Secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.

National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004)

The purpose of the Biodiversity Act is to provide for the management and conservation of South Africa's biodiversity within the framework of the NEMA and the protection of species and ecosystems that warrant national protection. As part of its implementation strategy, the National Spatial Biodiversity Assessment was developed.

This Act is applicable to this application for environmental authorisation, in the sense that it requires the project applicant to consider the protection and management of local biodiversity.

National Heritage Resources Act, 1999 (Act No. 25 of 1999)

This Act legislates the necessity for cultural and heritage impact assessment in areas earmarked for development, which exceed 0.5 hectares (ha) and where linear developments (including roads) exceed 300 metres in length. The Act makes provision for the potential destruction to existing sites, pending the archaeologist's recommendations through permitting procedures. Permits are administered by the South African Heritage Resources Agency (SAHRA) or their subsidiary bodies.

Promotion of Access to Information Act, 2000 (Act No. 2 of 2000)

The Act recognises that everyone has a Constitutional right of access to any information held by the state and by another person when that information is required to exercise or protect any rights.

The purpose of the Act is to foster a culture of transparency and accountability in public and private bodies and to promote a society in which people have access to information that enables them to exercise and protect their rights

4.3.2 Provincial Policies and/or Guidelines

The following key provincial and or regional policies and guidelines should also be considered:

- Integrated Environmental Management (IEM)
- National Spatial Biodiversity Assessment
- Protected Species – Provincial Ordinances
- Johannesburg Metropolitan Open Space System & Open Space Framework, 2007
- Regional Spatial Development Framework: Region E, June 2010
- City of Johannesburg Integrated Development Plan 2012 - 2016

5 METHODOLOGY

Due to the complex nature of this project, and the levels of contestation and resistance that the community has shown to the project, it was important to engage with the various stakeholders in a comprehensive manner. Furthermore the community has felt that previous SIA's that have been completed on other developments that have been proposed on the Huddle Park area did not comprehensively deal with their needs and the issues raised.

It was decided that a qualitative approach to data collection would be used, which focuses on in-depth data and considers individual interpretations of events, feelings and lived experiences (Greenstein, 2004). This method of data collection includes document analysis and interviews.

5.1 Sample

SEF engaged in purposive sampling with the aim to specifically select people to participate in the research on the basis of particular criteria, namely their knowledge of the project. However, a snowball sampling method i.e. referral of participants by participants was also used in order to ensure that relevant parties were contacted (Greenstein, 2003). SEF completed ten in-depth, semi-structured interviews as a primary data collection tool. This was used to identify individuals who represent the various community interests, and thus strive to be as representative of the views of the community as possible. This sampling method does, however, present the researcher with a limitation in the sense that the specific opinions of the majority of the community have not been verified. These interviews did, however, provided insights into the numerous aspects and issues raised, both positive and negative with the proposed development.

Key stakeholder groups, who actively engaged with the Environmental Assessment Practitioner (EAP) and the applicant during the environmental authorisation process were identified. These groups included the Huddle Park Environs and Anti-Degradation (HEAD) League, EarthLife Africa, an environmental Non-Governmental Organisation (NGO), as well as Ward Councillors and representatives of the residents of the area around the Huddle Park Golf Course, such as Mrs Laserson and Mr Fuchs. Furthermore, it was important to engage with the schools (King David Linksfield and Saheti) in the area as the proposed development may have various positive and

negative impacts that may affect schools. St Andrews School and Sandringham were both contacted for comment but did not accept the opportunity to be interviewed. A private individual who has been active in the opposition to the development, but did not wish to be named, was also interviewed. He shall be referred to as the anonymous interviewee.

The current upgrade and revival of the Huddle Park Golf Club and Course on two-thirds of the land that is known as Huddle Park, adjacent to the proposed Huddle Township Development site, has been very popular with golfers and residents. SEF engaged with the owner of the Golf Club, who has been driving the upgrade, in order to establish his views on the proposed development.

These interviews were all similar in format and question content; the respondents were provided with the opportunity to direct the discussions. This was important as each respondent was allowed the opportunity to voice the concerns that were most important to them and the group that they represented. In this way the interviewer did not lead the respondents to reach any conclusions or dwell on any particular issues. The interviews were conducted at a place and time convenient for the respondent.

In terms of the document analysis, there is a large amount of information regarding the history of the proposed development which has been considered. A large number of newspaper articles were consulted that detailed the nature and duration of the community's opposition to any development on the land (See Appendix A).

5.2 Assessment

For the purpose of assessing impacts during the SIA, the project will be divided into two phases from which impacting activities can be identified, namely:

Construction Phase:	All the construction related activities on site, until the contractor leaves the site
Operational Phase:	All activities, including the operation and maintenance of the proposed development.

The activities arising from each of these phases will be included in the impact assessment tables. This is to identify activities that require management actions to mitigate the impacts arising from them.

The assessment of the impacts will be conducted according to a synthesis of criteria required by the integrated environmental management procedure.

Extent The physical and spatial scale of the impact.	Footprint	The impacted area extends only as far as the activity, such as footprint occurring within the total site area.
	Site	The impact could affect the whole, or a significant portion of the site.
	Regional	The impact could affect the area including the neighbouring farms, the transport routes and the adjoining towns.
	National	The impact could have an effect that expands throughout the country (South Africa).
	International	Where the impact has international ramifications that extend

		beyond the boundaries of South Africa.
Duration The lifetime of the impact, that is measured in relation to the lifetime of the proposed development.	Short Term	The impact will either disappear with mitigation or will be mitigated through a natural process in a period shorter than that of the construction phase.
	Short-Medium Term	The impact will be relevant through to the end of a construction phase.
	Medium Term	The impact will last up to the end of the development phases, where after it will be entirely negated.
	Long Term	The impact will continue or last for the entire operational lifetime of the development, but will be mitigated by direct human action or by natural processes thereafter.
	Permanent	This is the only class of impact, which will be non-transitory. Mitigation either by man or natural process will not occur in such a way or in such a time span that the impact can be considered transient.
Intensity Is the impact destructive or benign, does it destroy the impacted environment, alters its	Low	The impact alters the affected environment in such a way that the natural processes or functions are not affected.
	Medium	The affected environment is altered, but functions and processes continue, albeit in a modified way.
	High	Function or process of the affected environment is disturbed to the extent where it temporarily or permanently ceases.
Probability The likelihood of the impacts actually occurring. The impact may occur for any length of time during the life cycle of the activity, and not at any given time.	Improbable	The possibility of the impact occurring is none, due either to the circumstances, design or experience. The chance of this impact occurring is zero (0%).
	Possible	The possibility of the impact occurring is very low, due either to the circumstances, design or experience. The chances of this impact occurring is defined as 25%.
	Likely	There is a possibility that the impact will occur to the extent that provisions must therefore be made. The chances of this impact occurring is defined as 50%.
	Highly Likely	It is most likely that the impacts will occur at some stage of the development. Plans must be drawn up before carrying out the activity. The chances of this impact occurring is defined as 75%.
	Definite	The impact will take place regardless of any prevention plans, and only mitigation actions or contingency plans to contain the effect can be relied on. The chance of this impact occurring is defined as 100%.

Mitigation – The impacts that are generated by the development can be minimised if measures are implemented in order to reduce the impacts. The mitigation measures ensure that the development considers the environment and the predicted impacts in order to minimise impacts and achieve sustainable development.

Determination of Significance – Without Mitigation – Significance is determined through a

synthesis of impact characteristics as described in the above paragraphs. It provides an indication of the importance of the impact in terms of both tangible and intangible characteristics. The significance of the impact “without mitigation” is the prime determinant of the nature and degree of mitigation required. Where the impact is positive, significance is noted as “positive”. Significance will be rated on the following scale:

No significance: The impact is not substantial and does not require any mitigation action;

Low: The impact is of little importance, but may require limited mitigation;

Medium: The impact is of importance and is therefore considered to have a negative impact. Mitigation is required to reduce the negative impacts to acceptable levels; and

High: The impact is of major importance. Failure to mitigate, with the objective of reducing the impact to acceptable levels, could render the entire development option or entire project proposal unacceptable. Mitigation is therefore essential.

Determination of Significance – With Mitigation – Determination of significance refers to the foreseeable significance of the impact after the successful implementation of the necessary mitigation measures. Significance with mitigation will be rated on the following scale:

No significance: The impact will be mitigated to the point where it is regarded as insubstantial;

Low: The impact will be mitigated to the point where it is of limited importance;

Low to medium: The impact is of importance, however, through the implementation of the correct mitigation measures such potential impacts can be reduced to acceptable levels;

Medium: Notwithstanding the successful implementation of the mitigation measures, to reduce the negative impacts to acceptable levels, the negative impact will remain of significance. However, taken within the overall context of the project, the persistent impact does not constitute a fatal flaw;

Medium to high: The impact is of major importance but through the implementation of the correct mitigation measures, the negative impacts will be reduced to acceptable levels; and

High: The impact is of major importance. Mitigation of the impact is not possible on a cost-effective basis. The impact is regarded as high importance and taken within the overall context of the project, is regarded as a fatal flaw. An impact regarded as high significance, after mitigation could render the entire development option or entire project proposal unacceptable.

Assessment Weighting – Each aspect within an impact description was assigned a series of quantitative criteria. Such criteria are likely to differ during the different stages of the project's life cycle. In order to establish a defined base upon which it becomes feasible to make an informed decision, it will be necessary to weigh and rank all the identified criteria.

Ranking, Weighting and Scaling – For each impact under scrutiny, a scaled weighting factor will be attached to each respective impact. The purpose of assigning such weightings serve to highlight those aspects considered the most critical to the various stakeholders and ensure that each specialist's element of bias is taken into account. The weighting factor also provides a means whereby the impact assessor can successfully deal with the complexities that exist between the different impacts and associated aspect criteria.

Simply, such a weighting factor is indicative of the importance of the impact in terms of the potential effect that it could have on the surrounding environment. Therefore, the aspects considered to have a relatively high value will score a relatively higher weighting than that which is of lower importance (See Figure below: Weighting description).

Extent	Duration	Intensity	Probability	Weighting Factor (WF)	Significance Rating (SR)	Mitigation Efficiency (ME)	Significance Following Mitigation (SFM)
Footprint 1	Short term 1	Low 1	Probable 1	Low 1	Low 0-19	High 0,2	Low 0-19
Site 2	Short to medium 2	Medium 2	Possible 2	Low to medium 2	Low to medium 20-39	Medium to high 0,4	Low to medium 20-39
Regional 3	Medium term 3	High 3	Likely 3	Medium 3	Medium 40-59	Medium 0,6	Medium 40-59
National 4	Long term 4	Very High 4	Highly Likely 4	Medium to high 4	Medium to high 60-79	Low to medium 0,8	Medium to high 60-79
International 5	Permanent 5	Catastrophic 5	Definite 5	High 5	High 80-100	Low 1,0	High 80-100

Identifying the Potential Impacts Without Mitigation Measures (WOM) – Following the assignment of the necessary weights to the respective aspects, criteria are summed and multiplied by their assigned weightings, resulting in a value for each impact (prior to the implementation of mitigation measures).

Equation 1:
$$\text{Significance Rating (WOM)} = (\text{Extent} + \text{Intensity} + \text{Duration} + \text{Probability}) \times \text{Weighting Factor}$$

Identifying the Potential Impacts With Mitigation Measures (WM) – In order to gain a comprehensive understanding of the overall significance of the impact, after implementation of the mitigation measures, it will be necessary to re-evaluate the impact.

Mitigation Efficiency (ME) – The most effective means of deriving a quantitative value of mitigated impacts is to assign each significance rating value (WOM) a mitigation effectiveness (ME) rating. The allocation of such a rating is a measure of the efficiency and effectiveness, as identified through professional experience and empirical evidence of how effectively the proposed mitigation measures will manage the impact.

Thus, the lower the assigned value the greater the effectiveness of the proposed mitigation measures and subsequently, the lower the impacts with mitigation.

Equation 2:
$$\text{Significance Rating (WM)} = \text{Significance Rating (WOM)} \times \text{Mitigation Efficiency}$$

Or
$$\text{WM} = \text{WOM} \times \text{ME}$$

Significance Following Mitigation (SFM) – The significance of the impact after the mitigation measures are taken into consideration. The efficiency of the mitigation measure determines the significance of the impact. The level of impact will, therefore, be seen in its entirety with all considerations taken into account.

5.3 Integration of Specialist's Input

In order to maintain consistency in the impact assessment, all potential impacts to the community will be listed in the table below. The assessment parameters used in the table will be applied to all impacts and a brief descriptive review of the impacts and their significance will then be provided. The various issues raised have been assessed in a qualitative manner, and each issue is dealt with

below. However in order to assess the severity of each of the issues that has been raised, a ranking scale has been used. It is important in the SIA to be able to assess the various scores that are reached in quantitative manner, in order to determine the level of impact that each issue has.

Example of an Impact Table

Nature		Status	-
Impact source(s)			
Affected stakeholders			
Magnitude	<i>Extent</i>		
	<i>Intensity</i>		
	<i>Duration</i>		
	<i>Reversibility</i>		
	<i>Probability</i>		
Significance	<i>Without mitigation</i>	Significance Rating (WOM) = (Extent + Intensity + Duration + Probability) x Weighting Factor	H
	<i>With mitigation</i>	Significance Rating (WM) = Significance Rating (WOM) x Mitigation Efficiency Or WM = WOM x ME	L
Confidence			

5.4 Ethics appraisal

SEF approached all aspects of the project with the appropriate amount of care and respect. As highlighted by Wassenaar (2006: 67), “autonomy and respect for the dignity of persons” is vital. Participants that were interviewed were not required to provide any information against their will and were informed of the nature of the interview and so participated willingly, thereby ensuring informed consent (Laher & Israel, 2006). SEF was always honest, fair and respectful towards all who participated and at no point did SEF attempt to deceive those interviewed (principles derived from Laher & Israel, 2006).

5.5 Limitations

Certain respondents declined to meet for an interview regarding the proposed development. This was due to the HEAD League’s decision to oppose the Final Scoping Report that was compiled by SEF. As a result some of their members’ views have not been incorporated into the project, which may mean that certain groups’ views/perceptions are only partially represented in this report. Furthermore, the opposition against the proposed development is political in nature. This is due to the fact that it involves the Council, various Ward Councillors from two major municipalities and political representatives and has a long history of contestation. As a result certain respondents were reluctant to have some of their views made public in this report.

Furthermore the newspaper articles are the reporters interpretation of feedback provided and may not be entirely accurate. The report also assumes that all respondents were honest and unbiased in the information which they provided. Furthermore it is assumed that the comments provided by representatives of groups do in fact represent that group’s opinions and are not the views of the individual interviewed.

The on-going uncertainty regarding the legality of the tender award, and the outcome of the Public Protector's investigation reflects on the community's ability to hold an informed opinion. This, and the community's perception that information which they have requested has not been provided in full, will compromise the SIA's ability to reflect accurately on the issues raised. This is due to respondents commenting without having had access to the correct information at the time.

Finally, the initial methodology of using a self-administered questionnaire, and distributing this to a large number of respondents in the community was decided against, in favour of a process of in-depth interviews. It was thought that a questionnaire would have led to respondents selecting negative responses simply to distort the process and ensure a negative outcome. However, this has resulted in much of the information on the opinions of the community being channelled through those interviewed. This means that it has not been possible to test the opinions and understanding of the project with the broader community which affects the outcomes of the SIA.

6 HISTORY OF THE DEVELOPMENT AREA

The Huddle Park area has been in existence since the 1920's with the golf course in operation since 1939. The community have been opposing various developers and development proposals, including a casino, since 1997 (Gallagher, 2005).

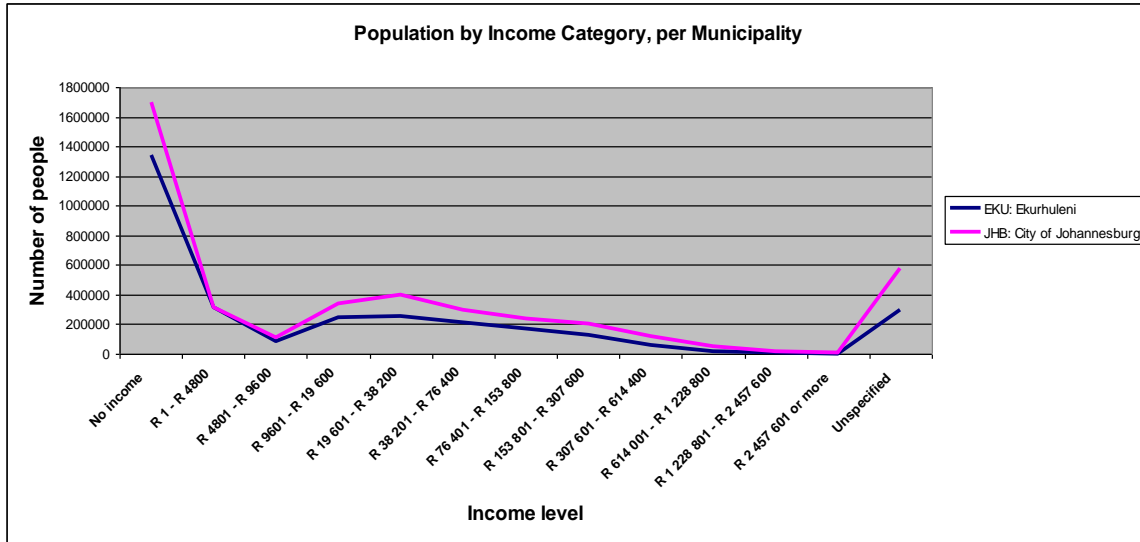
In 2006 an EIA commenced on the Huddle Park land for a larger development which had been proposed by the developer. However, that EIA was not concluded and a substantially revised development proposal was put forward by the developer. This is much smaller in scale, and will comprise 314 freestanding homes, 40 duplex or townhouses and 110 two, three and four storey apartments.

There is an investigation by the Public Protector pending on the sale of the land. However this SIA has been conducted based on the assumption that the transaction and the sale of the land are legal. Should this not be the case, it will dramatically alter the outcomes of the SIA.

7 EXISTING SOCIAL CONTEXT

The current status of the community, or baseline conditions, is included in order to understand the nature of the existing community, their way of life and the challenges they currently face, in order to assess the potential impact that the proposed development may have on the status quo.

Huddle Park lies within, and on the border of the CoJMM and the EMM. The CoJMM currently has an unemployment rate of 24.98% and EMM of 28.79% (Census 2011). With a combined population of over seven million people, CoJMM is home to 4,434,827 people, while EM has a population of 3,178,470.



Source: Statistics SA, Census 2011

Figure 4: Income levels in EM and COJMM

From the above graph it is evident that there are a very high number of individuals with either no, or very low income levels. However, there is an increase in the number of individuals, in both municipalities, with medium level earnings, and very few individuals at the top end of the earnings scale. However, the area surrounding the proposed development site is characterised by medium to high income earning households.

As is evident in Table 5, the majority of earners fall into the groups earning R 19 601 - R 38 200 and R 307 601 - R 614 400, annually.

Table 4: CoJMM and EMM Income statistics

	CoJMM - Ward 72	CoJMM - Ward 72
No income	713	863
R 1 - R 4800	48	106
R 4801 - R 9600	60	99
R 9601 - R 19 600	358	318
R 19 601 - R 38 200	1 114	736
R 38 201 - R 76 400	569	603
R 76 401 - R 153 800	575	939
R 153 801 - R 307 600	749	1 541
R 307 601 - R 614 400	1 005	1 955
R 614 001 - R 1 228 800	793	1 418
R 1 228 801 - R 2 457 600	262	474
R 2 457 601 or more	117	211
Unspecified	4	2

Source: Statistics SA, Census 2011

In terms of the two wards which are considered, Ward 72 of the CoJMM in which Huddle Park lies, and Ward 19 of EMM which borders the Huddle Park area, the largest population group is white people followed by black African people as illustrated in Table 2.

Table 5: Population demographics for CoJMM and EMM

	CoJMM - Ward 72	CoJMM - Ward 72
Black African	4 837	5 416
Coloured	255	535
Indian or Asian	262	1 711
White	12 871	18 438
Other	162	508
Total Population	18 388	26 608

Source: Statistics SA, Census 2011

According to Table 6, the majority of the CoJMM and EMM population are employed, with a fairly large portion of both populations being not economically active.

Table 6: CoJMM and EMM employment figures

	CoJMM - Ward 72	CoJMM - Ward 72
Employed	8 809	13 863
Unemployed	400	764
Discouraged work seeker	38	91
Other not economically active	2 879	4 183
Employment not applicable	6 263	7 707

Source: Statistics SA, Census 2011

With respect to the figures relating to crime in the area, the data from three police stations has been considered. This includes the:

- Norwood police station, which services the Huddle Park area, Linksfield, Linksfield Ridge, Norwood and Houghton (among others).
- Bedfordview police station which caters to Bedford Park and St Andrews, opposite the development site.
- Edenvale police station which is adjacent to the development site.

In all three areas, the levels of criminal activity have decreased since 2004. In Norwood, the total number of incidents has decreased from 6 790 in 2004 to 3 914 in 2012. In Bedfordview the totals for the same years have decreased from 5 114 to 3 523, while in Edenvale the number has changed from 5 718 to 3 728 between 2004 and 2012. This is most likely due to the increase in private security firms in operation in these areas. In the Linksfield and Senderwood areas, for example, there has been a major initiative in installing security cameras and having the presence of security guards in the area at all times (SLCAP, 2013). Furthermore in the Edenvale area, there are numerous, so-called 'gated-communities', in which access is controlled and there is a full time security presence in the area (DSV, 2013).

The current traffic situation in the area is largely congested at peak times in the morning and afternoons. This is true for the EMM ward 19 as well as in CoJMM near to the development site.

Due to the proximity to the N3 highway at Linksfield, there is a convergence of traffic in the morning and afternoon, largely travelling West in the morning and the opposite in the afternoon. This is exacerbated by slow traffic outside the schools in the area. More information regarding the flow of traffic during the day can be found in the Traffic Impact Assessment done by Goba Consulting Engineers dated November 2012.

8 IMPACT ASSESSMENT

This chapter will assess the various issues that have been raised by the community. The predicted impacts will be discussed and analysed, and mitigation measures will be proposed. These mitigation measures aim to provide the means through which to reduce the negative impacts and enhance those positive aspects of the proposed development.

There are issues which arise in the construction phase and those that will arise during the operation phase, and so under each heading, the issue will be addressed for either construction, and/or operational phase as is appropriate.

8.1 Noise

The Saheti School has pointed out their concern with regard to the levels of noise that will be generated during the construction phase of the proposed development. Due to the proximity of the building site to the school (it is diagonally opposite the construction site), it is perceived that the noise will potentially disrupt the quiet learning environment that schools try to establish. There is also potential for the construction phase to impact on the residents in the area, particularly those who live close to the construction site. During the operational phase, noise impacts will be reduced to normal day time levels and it is anticipated that this impact will therefore only continue throughout the construction phase, where after the impact will be negated.

Noise – in terms of noise impact, the National Noise Regulations define an increase of 7dB as disturbing. It is therefore advised that noise levels be kept within 7dB of the baseline data¹. Noise reduction is essential and contractors must endeavour to limit unnecessary noise, such as hooters of vehicle revving. The use of silent compressors is a specific requirement. Neighbouring landowners, schools and businesses adjacent to the development should be notified 24 hours prior to any planned activities that will be unusually noisy.

Nature	Perceived Increased Noise	Status	-
Impact source(s)	Construction activities on the site		
Affected stakeholders	Saheti School and the neighbouring residents		
Magnitude	<i>Extent</i>	<i>Site</i>	
	<i>Intensity</i>	Medium	
	<i>Duration</i>	Short – Medium Term	

¹ Baseline data should be collected prior to the commencement of any construction activities. A baseline ambient noise survey should be conducted by recording equivalent continuous rating levels for day-time (06:00 to 22:00) and night-time (22:00).

	<i>Reversibility</i>	Reversible	
	<i>Probability</i>	Likely	
Significance	<i>Without mitigation</i>	$(Extent + Intensity + Duration + Probability) \times WF$ $(2 + 3 + 2 + 3) \times 4 = 40$ Medium	M
	<i>With mitigation</i>	$WOM \times ME = WM$ $40 \times 0.6 = 24$ Low to Medium	LM
Confidence	Medium		

Mitigation measures:

1. Existing community forums must serve as liaison between the affected stakeholders, the developer and his appointed contractor and must facilitate communication with regard to traffic, dust, noise and construction related concerns
2. The construction should be kept to normal business hours (06h00 – 18h00), in order to reduce the adverse impact of noise on the surrounding neighbourhood.
3. Where possible, activities that are expected to generate excessive noise should be scheduled to occur between 14h00 and 17h00 or on weekends, as this will limit the impact on the surrounding schools.
4. All construction equipment or machinery should be switched off when not in use.
5. Construction equipment must be kept in good working condition.
6. All construction vehicles must abide by speed limits and should not exceed speed limits of 40km/ hour to reduce their potential to contribute to the already high traffic noise.
7. Construction vehicles should avoid using the main roads during traffic peak times.
8. As per the noise specialist’s recommendations, a boundary wall, or linked faced acting as a noise barrier should be erected along the south and eastern boundaries, especially during the construction phase.
9. The maximum acceptable night time noise levels should not be exceeded.
10. Traffic calming measures should be put in place to minimise traffic noise.
11. Recommendations made in the EMP should be adhered to.

Significance of the impact

Due to the limited number of noise receptors (adjacent landowners) the impact associated with increased ambient noise levels during the construction phase is predicted to be of a medium significance. The implementation of noise mitigation measures will reduce the significance of the impact to low.

8.2 Dust

The Saheti School has indicated their concern with regard to the possible levels of dust that will occur during the construction phase of the proposed development. Due to the proximity of the building site to the school, this has the potential to lead to nuisance impacts on the students and teachers at the school. This will also have an impact on the residents in the area, particularly those who live in close proximity to the construction site. This impact will only be felt during the construction phase and will be negated once the development has been established.

Nature	Perceived Increased Dust levels	Status	-
Impact source(s)	Construction activities on the site		
Affected stakeholders	Saheti School and the neighbouring residents		
Magnitude	<i>Extent</i>	Site	
	<i>Intensity</i>	Medium	
	<i>Duration</i>	Short – Medium Term	
	<i>Reversibility</i>	Reversible	
	<i>Probability</i>	Highly likely	
Significance	<i>Without mitigation</i>	$(Extent + Intensity + Duration + Probability) \times WF$ $(2 + 5 + 2 + 4) \times 4 = 52$ Medium	M
	<i>With mitigation</i>	$WOM \times H = WM$ $60 \times 0.2 = 10.4$ Low	L
Confidence	High		

Mitigation Measures

1. Appropriate dust suppression methods must be applied. During the construction phase, it is suggested that dust production be controlled by the regular watering of roads and work areas.
2. Exposed soil stockpiles shall be covered, kept damp or protected using organic binding agents or alternative techniques that are not water intensive.
3. The clearing of vegetation must be kept to a minimum and only undertaken where and when required.
4. Avoid unnecessary movement of construction vehicles on exposed soils.
5. Vehicles travelling on unsurfaced roads must travel at a speed that creates minimal dust entrainment.
6. Prevent dust blowing off transported materials by washing vehicles, wheels and covering loads.
7. Recommendations made in the EMP should be adhered to.

Significance of the impact

Due to the uncertainty regarding the levels of dust that may be generated during the construction period and the effect that these may have on the schools and residents in the area, the impact is perceived to be of a medium significance. The implementation of effective dust mitigation measures by the contractor during construction will reduce the significance of the impact to low.

8.4 Crime

Construction phase

There is major concern regarding an increase in crime during the construction phase and this theme was raised by all respondents. Mr Kruger indicated that crime is an important issue, and feels that this issue had not been adequately addressed by the developers. There is a perception that the developer has not developed a clear strategy to minimise or prevent crime from occurring during the construction phase. There is currently a very large private security presence in the areas surrounding the Huddle Park area, indicating that crime is an existing problem and that residents have taken measures to secure their environment. Furthermore the duration of the construction period, which has been indicated to be five years, means that this is an impact which may be experienced for a significant period of time.

The Saheti School is concerned about crime during the construction phase as their property is very large and it is difficult to secure. The school is also very close to the proposed construction site. There is a concern that the school premises will be targeted for criminal activities while there are construction workers on-site.

With the expected increase in taxis and therefore access to the area, due to increased numbers of workers in the area, it is perceived that the levels of crime in the area will increase. As discussed below there is likely to be formation of an informal taxi rank on the vacant land opposite the development.

In order to address safety concerns, the following movement and circulation system principles can be implemented to promote public safety:

- Promote public safety with the design of driveways that ensure adequate vehicular ingress and egress from public roads;
- Provide landscape treatment that supports the sight line requirements of the driveways and public roads;
- Separate pedestrian circulation from vehicular circulation;
- Provision must be made for both pedestrians and cyclists along streetscapes without conflict between the two; and
- Integrate the whole landscape design so that access to all areas and the use thereof is clear.

The following territorial reinforcement principles can also be implemented to promote public safety:

- Establish a network of paved pathways and natural trails that integrate the urban landscape with the natural open space system;
- Actively promote and encourage occupants and residents to become involved in and join community walking, jogging, cycling, environmental awareness or bird watching clubs with a added objective of providing a constant and wide net of monitors that are involved in their favourite recreational pastimes;
- Provide tamper proof methods of sounding the alert when potential offenders are noticed; and
- Establish a territorial presence through consistent “branding’ of landscape elements, of uniforms of security and environmental monitors.

Nature	Perceived increase in crime during construction	Status	-
Impact source(s)	The increased number of workers on site		
Affected stakeholders	Residents of the local community and the schools in the area.		
Magnitude	<i>Extent</i>	Regional	
	<i>Intensity</i>	Medium	
	<i>Duration</i>	Short – Medium	
	<i>Reversibility</i>	Reversible	
	<i>Probability</i>	Likely	
Significance	<i>Without mitigation</i>	Significance Rating (WOM) = (Extent + Intensity + Duration + Probability) x Weighting Factor (3 + 3 + 2 + 3) x 5 = 55	M
	<i>With mitigation</i>	Significance Rating (WM) = Significance Rating (WOM) x Mitigation Efficiency <i>WOM x H = WM</i> <i>55 x 0.6 = 33</i> <i>Low to medium</i>	L - M
Confidence	High		

Mitigation measures:

1. The workers on site must retain some means of identification.
2. Workers should not remain on site overnight or over the weekends.
3. Security should be prominent on site .
4. Security personnel should be on site on a permanent basis.
5. The construction area should be fenced to avoid unauthorised entry by humans or animals onto the construction area.
6. The contractor should communicate the construction schedule and vehicle movements to the neighbouring property owners in advance.
7. Workers must not be allowed to leave the designated construction areas without permission.
8. A Health and Safety Plan should be implemented and it must be ensured that all managers are trained in First Aid and other relevant safety courses.
9. Operational safety risks should be addressed as part of the Occupational Health and Safety Act (Act 85 of 1993).
10. Local, unemployed labour should be employed as far as possible.
11. Construction workers should be clearly identifiable by ensuring they wear uniforms and identification cards that should be exhibited in a visible place on their body.
12. Community patrolling and the use of existing initiatives to curb crime used by the community should be supported by the developer.
13. The movements of contractors' teams must be known. In particular, movement of vehicles during the hours of darkness is strictly limited to emergencies only. At all times, vehicles are to travel with caution due to the risk of collision with pedestrians.
14. Ensure that the expected increase in safety and security risks are mitigated through additional security at the construction site, additional community policing in the project area, and other measures agreed to by SAPS and the community.

15. No unauthorised firearms are allowed on site. The discharge of any firearms on the site must be reported to the SAPS.
16. Train workers in order to assess emergency situations and act according to pre-set protocols in order to ensure their safety.
17. Recommendations made in the EMP should be adhered to.

Significance of the impact

Due to the lengthy period over which construction will occur, the location and size of the school's boundaries and the proximity to high value residential areas, the impact of crime during the construction phase is perceived to be of a medium significance. The implementation of effective crime mitigation measures will reduce the significance of the impact; therefore, the impact will be low to medium.

Operational Phase

During the operational phase of the project, the community expects there to be an increase in levels of crime in the area due to a number of factors. Firstly, with the retail component of the development, it is expected that there will be an increase in new people being drawn to the area. This may result in opportunistic crime increasing as there will be a collection of people, vehicles and valuable goods in an area which is currently public open space. There is also a concern that with an increased number of workers coming to the area each day and the corresponding growth in taxis in the area, crime may increase. There is currently a low and decreasing level of crime in the area, due to the presence of private security in the area, which may reduce the potential for an increase in crime.

Nature	Perceived crime as a result of the residential and retail developments and increased number of taxis	Status	-
Impact source(s)	Increased number of residents, workers, visitors and taxi's in the area		
Affected stakeholders	Residents, pedestrians, the schools		
Magnitude	<i>Extent</i>	Regional	
	<i>Intensity</i>	Medium	
	<i>Duration</i>	Long term	
	<i>Reversibility</i>	Reversible	
	<i>Probability</i>	Likely	
Significance	<i>Without mitigation</i>	Significance Rating (WOM) = (Extent + Intensity + Duration + Probability) x Weighting Factor $(3+ 3 + 3 + 3) \times 5 = 60$	M-H
	<i>With mitigation</i>	Significance Rating (WM) = Significance Rating (WOM) x Mitigation Efficiency Or $WM = WOM \times ME$ $36 = 60 \times 0.6$	L-M
Confidence	Medium		

Mitigation measures:

1. The retail centre management should attempt to ensure that the retail centre is secure and that access of both vehicular and pedestrian traffic is regulated.
2. The retail centre management should ensure that the centre is patrolled by guards during non-operational hours.
3. Once established, there should be a link between the current SLCAP and the security at the development, to ensure that they are able to actively patrol the area.

Significance of the impact

Before mitigation measures occur, the impact is predicted to be medium – high. However, after implementing the suggested mitigation measures, the impact is expected to reduce to a low to medium impact, after mitigation.

8.5 Changes in the visual character of the area

The community, including the Saheti School, are concerned about the visual impact of the proposed development. The retail component and the high density nature of sections of the housing is anticipated to alter the visual character of the area, which is currently a green open park space.



Figure 5: Current view opposite Saheti School, where the planned retail area will be located

It is anticipated that the construction of the proposed development will affect Saheti School as it is diagonally opposite the proposed development site. This is also true for the houses that are on the opposite side of Club Street to the proposed development site. The residents in the community adjacent to the proposed development site, and those who commute via the area, will also experience the effects of this altered visual character. A Visual Impact Assessment (VIA) has been undertaken to determine the extent to which the visual character of the surrounding residential area will be impacted on.

The community are very concerned about the large number of established trees on Club Street which will have to be cut down, should the roads need to be widened. Mr Fuchs, Mr Kruger, Mrs Laserson and Mrs Taylor indicated that, as well as the trees which will be lost, there is concern regarding the negative impacts on wildlife and bird life on the proposed development site as a number of trees will have to be removed in order to make way for the housing. The Ecological report highlights that the construction activities will most likely lead to the displacement or mortality of various fauna and flora species. However there are few species which have been highlighted as important in terms of conservation standards.

This impact will begin during the construction phase but will continue as the loss of trees is permanent. Thus the impacts extend from construction to operational phase.

According to the VIA, the most prominent effects will be felt by residents living in areas which lie above the level of the development since the site is bordered by large hilly areas. Thus the higher lying residential areas will “be more sensitive to visual impacts from the development” (van Greunen, 2013).

Nature	Loss of visual aesthetics due to high rise buildings	Status	-
Impact source(s)	Development of high rise buildings		
Affected stakeholders	Seheti School, neighbouring communities, commuters		
Magnitude	Extent	Regional	
	Intensity	Medium	
	Duration	Long term	
	Reversibility	Irreversible	
	Probability	Likely	
Significance	Without mitigation	Significance Rating (WOM) = (Extent + Intensity + Duration + Probability) x Weighting Factor $(3+ 3 + 4 + 3) \times 5 = 65$	M-H
	With mitigation	Significance Rating (WM) = Significance Rating (WOM) x Mitigation Efficiency Or $WM = WOM \times ME$ $39 = 65 \times 0.6$	L-M
Confidence	Medium		

Mitigation measures:

1. The development proposal and layout should ensure that the aesthetic quality of the environment be enhanced, rather than detracted from.
2. The developer should ensure that new trees are planted in order to replace those that have been cut down.
3. Wherever possible, trees should be preserved and not cut down.
4. The planning of the layout of the proposed development should attempt to incorporate as many existing trees as possible.
5. The flow and continuity between the existing and proposed new residential areas should be maintained as far as possible.
6. As far as possible, original trees should be retained and new trees should be planted in order to replace those that are lost in the construction phase. This will act as natural screening to the change in landscape.
7. The design of the entrance to the development, houses, apartments and the nature of the boundary wall should be kept in line with the character of the residential area which the proposed development site borders.
8. The developer in liaison with the contractor must ensure that the site of development be maintained and kept as neat and clean as possible during and after construction.
9. The areas in which refuse is stored for the residential areas should be out of sight of the road.
10. An attempt should be made to plant trees and maintain an attractive pavement area.
11. The developer shall not establish or undertake any activities, which in the opinion of the ECO, are likely to adversely affect the scenic quality of the area by referring to the activities' texture, scale, locality and appearance. The ECO may direct the developer to refrain from such activities or to take mitigatory actions to reduce the adverse effect of such activities on the scenic quality of the environment.

12. The colours of all permanent structures shall be chosen so as to blend in with the dominant colours of the surrounding landscape.
13. In liaison with existing community forums, an attempt should be made to enhance the aesthetic quality of the surrounding environment (i.e. greening pavements by planting trees).
14. The mitigation measures and recommendations made in the VIA should be adhered to.

Significance of the impact

Before mitigation measures occur, the impact is predicted to be medium - high. However, with mitigation, the impact is expected to be reduced to low to medium.

8.6 Traffic

The schools in the area have indicated that they are already struggling with high traffic volumes and the effect that this has on traffic flow. It is expected that during the construction phase there will be an increase in the number of heavy vehicles on the roads. This traffic congestion will be exacerbated should there be construction vehicles impede traffic in the area.

There is much concern regarding traffic at King David Linksfield School (KDLS) and at the Saheti School. These two schools are reportedly already struggling with congestion in the morning and afternoons. There is much congestion and it is not safe for children to be crossing the road where there are high traffic volumes. The concentration of cars in the area in addition to the school traffic will need to be addressed.

The area surrounding the proposed site for development was observed on numerous occasions (22 February 2013, 28 February 2013, 4 March 2013, 8 March 2013, 2 April 2013, 11 April 2013, 7 April 2013 and 28 April 2013) during the SIA fieldwork. Visits to the area included times before the school day began, at the time that schools exit in the afternoon, at peak hours and over the weekend. It is apparent that there is a problem with congestion at the schools during the peak school arrival and departure times. There was also heavy traffic travelling West and North in the mornings and East and South in the afternoons. Over the weekends, traffic was not excessive or problematic. At both schools, there was a large amount of congestion at the peak times. And it is difficult both for those passing by, as well as for parents trying to find parking, or leave the area at these times.

KDLS proposed a parking area within the current Huddle Golf Course area. If this was to be facilitated and the parking situation for the school was addressed, then the school would not oppose the development. However with the current traffic, congestion and safety issues that the school has relative to parking, they are very concerned about the development going ahead. According to KDLS, and as confirmed in the TIA, the roads situation is unsustainable as it currently stands. It is advised that the School Governing Body be involved in the process of ensuring safe road conditions around the school and ensuring that learners and their parents are made aware of road safety measures, especially when crossing roads.

According to Rabbi Kacev, KDLS has asked for measures such as speed bumps and rumble strips to slow passing traffic, but the Johannesburg Metro Police Department (JMPD) reportedly denied these requests. The traffic light outside the school was paid for by the school itself, and not the

municipality. Thus the schools traffic problems have not been adequately dealt with in the past and any improvements have been at their own expense. There is a great need for more parking for the school, and if the proposed development went ahead without significant upgrading of the roads, then KDLS feels that the results would be to their detriment.

SAHETI have also expressed concern regarding the traffic levels and the safety of the school children. Again, if a solution was reached in which the school could gain a second entrance to their property from Linksfield Road, then they would not be opposed to the development. The school is bordered by a municipal servitude, resulting in the school having only one entry point. They wish to make use of an existing traffic light and intersection on Linksfield Road. However, the issues that they currently face regarding traffic congestion at the peak school times, mean that they would be reluctant to support the development should there not be a major consideration of the traffic impact.



Figure 6: Intersection bordering SAHETI which could be used for school access

It is expected that should traffic increase, it may be pushed onto surrounding roads, which are not positively impacted upon by the proposed traffic mitigation measures. Mr Kletz, a golf professional at the Huddle Park Golf Course, indicated that should one of the traffic lights fail to function correctly at the corner of Club and Civin Drive, there is a great amount of congestion.

There is also concern that, apart from the individuals who will live in the new residential development, there will be an additional traffic impact as a result of the influx of workers. This is in terms of the security and maintenance of the proposed development, as well as domestic workers and gardeners who will be employed at the individual homes. These individuals are likely to enter the area using taxis as other public transport option in the area is lacking. It is expected that this will compound the expected effects on the road system. In addition to those employed within the residential component of the development, it is expected that there will be a large number of people who would commute into the area if they are employed at the retail centre.

According to the TIA, it is expected that the retail centre will generate 150 vehicle trips in the morning, 412 in the afternoons and 644 at the peak hour on a Saturday.

The Traffic Impact Assessment (TIA) highlights that before the development can proceed, there are a number of intersections which require upgrading. These are:

- Club/Civin/Linksfield intersection during the A.M. Peak.
- Civin/Chaucer/St Christopher intersection during A.M. Peak.
- Club Street and Donné Avenue
- Club Street and Shelley Avenue
- Club Street and St Andrews Avenue
- Club Street and Byron Avenue
- Club Street and King David School Access

The TIA also indicates that there are currently “unacceptable levels of service on the existing local road system”.

HEAD League indicated that there will be traffic bottlenecks, even if there is traffic mitigation. This, in their opinion, is due to the nature of the road network surrounding the park, and the inability to expand the road past certain sections. There is concern that the planned widening of the road will not alleviate the traffic impacts and will simply shift the points of congestion. Furthermore the TIA was conducted only in the immediate area of the development site, and did not extend to, or beyond, the intersection of Club and Bedford Streets, at the King David School. It is at this point and heading further west that there will be a bottleneck. Thus there is concern that the TIA was too narrow in scope.

Finally, should the proposed development proceed, it will be of great importance to ensure that there is a comprehensive traffic management plan in place. It would be required that representatives of the schools, CoJMM and EMM, as well as the developers meet in order to develop such a plan. This is of utmost importance due to the schools in the area, which should not be disrupted due to the construction or once the development has been completed. Saheti school has already been required to delay the start time of their school day, due to the difficulty that parents face – due to traffic congestion - in getting their children to school on time.

Traffic during construction phase

Nature	Increased traffic during construction		Status	-
Impact source(s)	A large number of trucks and other construction vehicles on the roads in the area and at the development site.			
Affected stakeholders	Users of the roads in the area, residents, schools.			
Magnitude	<i>Extent</i>	Regional		
	<i>Intensity</i>	High		
	<i>Duration</i>	Short – Medium Term		
	<i>Reversibility</i>	Reversible		
	<i>Probability</i>	Definite		
Significance	<i>Without mitigation</i>	Significance Rating (WOM) = (Extent + Intensity + Duration + Probability) x Weighting Factor (3 + 5 + 2 + 5) x 5 = 75		M - H
	<i>With mitigation</i>	Significance Rating (WM) = Significance Rating (WOM) x Mitigation Efficiency Or WM = WOM x ME 45 = 75 x 0.6		M
Confidence	High			

Mitigation measures:

1. A designated area within the confines of the development site should be created for the trucks and construction vehicles to park, so that they do not obstruct vehicles or pedestrians.
2. The improvements to the road network must take place concurrent to construction.
3. It is important that contractors are closely monitored to ensure that they keep to designated routes and that they obey the traffic laws and speed limits.
4. Construction vehicles should be clearly visible and drive with their headlights on at all times to increase visibility.
5. Traffic calming measures should be put in place to deter any unnecessary through-traffic through the surrounding neighbourhoods.

Significance of the impact

Before mitigation measures occur, the impact is predicted to be medium - high. The impact is expected to decrease to medium with mitigation.

Traffic during operational phase

Once the development is operational, it is anticipated that there will be an increase in traffic volumes from the residents in the area. It is the community's perception that the influx of people who will now be commuting from the housing development will be an additional strain on the road network and result in increased traffic in the area.

Furthermore there is concern that, apart from impacting on the traffic situation through a greater number of taxis on the roads in the area, road safety will deteriorate as a result of the increased number of taxis on the road. This is due to what is perceived as a general disregard from taxi drivers

for traffic regulations, road safety and the safety of passengers and other vehicles. The increased number and usage of taxis in the area is seen to be negative. There is an informal taxi rank that currently exists opposite the proposed development site, and this is thought to be likely to expand, should the development proceed. Mr Rundle, Ward Councillor of Ward 19 Ekurhuleni, concurs with this sentiment, indicating that the influx of people and those who are employed by them will increase traffic volume, specifically taxis.

This increase in the number of taxis will be evident from the construction phase, through to the operational phase. This is due to the fact that initially the taxis will be transporting construction workers, and thereafter workers in the residential and workers and shoppers to the retail area of the development.

Nature	Increased traffic during the operational phase		Status	-
Impact source(s)	A large increase in the number of vehicles; both private and taxis; on the roads in the area and at the development site.			
Affected stakeholders	Commuters, residents, schools.			
Magnitude	<i>Extent</i>	Regional		
	<i>Intensity</i>	High		
	<i>Duration</i>	Permanent		
	<i>Reversibility</i>	Reversible		
	<i>Probability</i>	Likely		
Significance	<i>Without mitigation</i>	Significance Rating (WOM) = (Extent + Intensity + Duration + Probability) x Weighting Factor (3 + 5 + 5 + 3) x 5 = 65		M-H
	<i>With mitigation</i>	Significance Rating (WM) = Significance Rating (WOM) x Mitigation Efficiency Or WM = WOM x ME 52 = 65 x 0.8		M
Confidence	Low to medium			

Mitigation measures:

1. See mitigation measures for construction phase, as these can be implemented during the operational phase also.
2. The schools should initiate road safety and awareness programmes.
3. The entrances to the development should be well signposted, so that motorists are able to drive cautiously in these areas, as vehicles entering and exiting the development will be driving at slower speeds than traffic on the roads.
4. Where possible, solutions that assist with the current school traffic, and the school's parking problems should be adopted, such as additional entrances.
5. The traffic mitigation measures should be in place before the construction begins, in order to ensure that there is minimal disruption in an already congested area.

Significance of the impact

Before mitigation measures occur, the impact is predicted to be medium to high. This is as a result of the increased number of vehicles that will be drawn to the area for the retail component, as well

as the large number of residences to be built. The existing roads network is currently unsustainable and in need of upgrading. Even though there is limited possibility of road widening, and the presence of the schools, with the congestion that they create is expected to cause problems during the construction and operational phase, with the implementation of proper mitigation measures, the impact can be reduced to medium with mitigation.

8.7 Environment and sustainability

An area of much concern for the residents is the detrimental effect that the proposed development will have on the environment. Many respondents indicated that they believe that cities such as Johannesburg rely on the presence of a green lung and open space. There is concern that the level of development in the CoJMM, and the EM has increased dramatically in recent years, with construction occurring in many previously open spaces. This leads the community to feel that they should preserve the open space. EarthLife Africa indicated that they are concerned that the proposed development will have an adverse impact on the bird life in the area. Mr Rundle concurs indicating that on the Sizwe land opposite the proposed Huddle Township development there are indigenous grasses and rare flower species that may also occur on the area designated for the proposed Huddle Township development. Therefore he would like to ensure that these are conserved and appropriately protected.

It is also important to view impacts in a holistic way and determine what the cumulative impact of specific actions on the environment (social and biophysical) will be. In this way, the adverse effects of a project in terms of a broader environmental sustainability vision and the effects on a broader community are considered. One of the respondents concurred about the concern regarding the detrimental effect that the proposed development would have on the environment. There are many examples of open space areas that are close in proximity to Huddle Park that have recently been developed. These include the Greenstone area and an area in Dowerglen where houses have been built on a portion of the Glendower Golf Course. The respondent highlighted that, although the Huddle Township Development is prime real estate in terms of its size and position, it is also a vital green lung for the community. He would like to see the green lung preserved as it serves an important broader environmental purpose.

EarthLife Africa (ELA) indicated that there is concern regarding the environment, erosion and the adverse effect that increased runoff would have on communities living further along the Jukskei River in Alexandra. This will, it is feared, have detrimental effects on the river and also those who live on the banks of the Jukskei River. The river often floods and this affects the poor communities living there. It is therefore important to ensure that cumulative effects, such as storm water runoff be properly mitigated, managed and monitored throughout the construction and operational phase of the development.

According to Ixhaphozi Enviro Services (IES), who completed a wetlands assessment on the development site, "the development, while not encroaching on the wetland, has the potential for altered storm water runoff patterns into the wetland which has implication for erodible soils on the slope". IES recommend "a dedicated storm water management strategy ... be drawn up in order to minimise impacts on down-slope erodible soils in the wetland area" which should include slow-release containment areas and into areas which will be used in the golf course.

In the recommendations made in the Wetlands Report by IES, they indicate that it is crucial to have a sound attenuation strategy “as erosion pressures are immense at the lowest part of the golf course site. The minimisation of these pressures is dependent on integrated storm water management in the catchment. The current approach of including soft engineering containment structures that are vegetated (and that double as additional artificial wetland areas) is strongly advised” (IES: 2013:33).

Nature	Cumulative storm water impacts	Status	-
Impact source(s)	Stormwater runoff into Jukskei River		
Affected stakeholders	Residents of Alexandra living on the banks of the Jukskei River		
Magnitude	Extent	Regional	
	Intensity	Medium	
	Duration	Medium	
	Reversibility	Reversible	
	Probability	Probable	
Significance	Without mitigation	Significance Rating (WOM) = (Extent + Intensity + Duration + Probability) x Weighting Factor (3 + 3 + 3 + 1) x .3 = 30	L-M
	With mitigation	Significance Rating (WM) = Significance Rating (WOM) x Mitigation Efficiency Or WM = WOM x H 6 = 30 x 0.2	L
Confidence	High		

Mitigation measures:

1. The correct water attenuation mechanisms as per IES’s recommendations, should be implemented, to be able to deal with increasingly severe storms and the related large volumes of water.

Significance of the impact

Before mitigation measures occur, the impact is predicted to be low to medium. If the mitigation measures are implemented comprehensively in a manner which will ensure that the adverse impacts are reduced, the impact becomes low.

8.8 Feelings in relation to the project

Proposed projects and developments often generate uncertainty, anxiety or fear and sometimes, the impacts perceived in anticipation of the planned intervention can be greater than the impacts that ultimately result from the intervention (Burge and Vanclay, 1995).

These impacts include uncertainty, annoyance², dissatisfaction due to a failure of the project to deliver promised benefits and an experience of moral outrage, for example where a project leads

² A feeling/experience due to disruption of life, but which is not necessarily directed at the intervention itself.

to violation of deeply held moral or religious beliefs or requires (in extreme situations) households to relocate their houses to make way for the new project.

The credibility or trust in government, as well as attitudes towards private companies, will affect a community's attitudes towards the process. If people have been made promises by companies and politicians before, and have been disappointed, it is less likely that they will believe that benefits offered will actually be delivered. When offers to negotiate economic or other benefits become part of the public consultation process, they can create serious internal tensions within communities and cultural groups or exacerbate ones already existing. The long term ramifications of these can be very serious and very negative for the social fabric of a community.

The feelings of the residents, even though it can be biased sometimes, should therefore not be disregarded. In order to develop the piece of land in a responsible manner, the developer should not only consider the ecological impacts of the proposed development, but also the social impacts. Social impacts are often subjective and there is a need to address both actual and perceived impacts.

The community surrounding the proposed development has emotional and affective ties with the land, which cannot be discredited. Many people find a sense of community and their sense of place is tied to the land. They enjoy living where they do, based on the fact that they are so near to the open space. People have a psychological attachment to the land, which should be respected. This is evident as NEMA indicates that "Environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitably". According to the CoJMM Spatial Development Framework (SDF) for 2012-2016, the city aims to achieve "responsible use of the City's natural and heritage resources (water, open spaces, ridges, rivers etc.)" (SDF: 2013).

The land has been a community open space that has been designated for use by the community since the 1920s. For this reason, it has become central to the community. The use of the land, as being by and for the community, is central to the opposition to the development. There is a feeling among the community that the land was deliberately neglected in order to justify the sale of the land. This degradation of the land resulted in community members ceasing to use the land, as they were concerned by an increasing number of criminal activities and their safety was not guaranteed.

According to Mr Shulman of the HEAD League, the community will lose an asset but will not be gaining anything of value in return. Furthermore, if private development is necessary on the piece of public land, Mr Shulman feels that the density is too high which will exacerbate the problems which will result from the development.

People moving into the area, and those who have lived in the area for a long time such as Mrs Laserson, feel that the open space is central to their quality of life. Indeed, comments on the Facebook page indicate that many people have emotional ties to the land and the golf course and express their gratitude that it is being restored. The area has been improved significantly in recent months, with a private individual, with the backing of the community, securing a lease for two-thirds of the land. They have revived the golf course, and revamped the facilities. There is currently a 9-hole mashie golf course, a driving range, pro-shop and related facilities. In the coming months an 18-hole golf course will be finalised and opened.

With this development at the golf course, there has been much interest from the community, and the opening the mashie course has been well supported. In visiting the Huddle Park Golf Course on numerous occasions in completing the research and fieldwork for this report, it is evident that there is much interest in the facility and people are making use of the new facilities at all times of the day and week. Furthermore, the community are currently also using the proposed development portion of the land for walking, cycling and dog walking. This indicates that the community do have a need for an open space area, and when a safe area is provided, they will make further use of the land.

The community have been arguing for the preservation of the entire Huddle Park area for over 10 years. As a result they believe there is no appropriate mitigation, apart from the no development option. The community believe that the land provides a 'Green Lung' function to community and is a space which is visually appealing and provides an area in the city for nature to thrive.

The following is a summary of some of the action taken by the community some of which are attached in Appendix One:

- In 1998, an article in the North-Eastern Tribune highlighted that the HEAD League had not received replies to numerous objections about the proposed development on the Huddle Park. Mr Drucker stated that he "had sent a letter to the council's attorneys" (Thornton, 1998). He then sent follow up letter one month later, after receiving no response.
- In 1999, the HEAD League was active in opposing the National Sports Council, and indicates that the HEAD league "opposed it with court interdicts all the way" (Drucker in Cohen, 1999).
- In an article published in 2005, it states that "Since 1997, residents whose homes border this Linksfield property in western Johannesburg, have been fighting off developers. First, Malaysian developers wanted to build a casino. Then the National Sports Council had planned in 1998 – and now the Tiyani Group has appeared" (Gallagher, 2005). This report also references Mrs Laserson who has been active in the contestation for many years.
- In March 2005 Mr Drucker indicated that a "team which includes town planners, environmental consultants and traffic engineers ... will do all that it can to make this [development of public space for use by citizens] come about"
- On 22 November 2005, the community called a meeting with the council and the public (Laserson, 2005)
- In an article published in 2006, Mr Drucker, chairperson of the HEAD League, is quoted as saying "we are fighting for the council to allow the development of Huddle Park as public open space" (Bodasing, 2006)
- In October 2007, Mrs Laserson also indicated in a letter in the North-Eastern Tribune that the HEAD League was holding a public information meeting regarding the development of the Huddle Park area.
- In 2007 it was reported that the *Save Huddle Park* Facebook group was launched, and had over 700 members (Bega, 2007). Furthermore, the article in the Saturday Star highlights that Mr Fuchs had organised a "family-day festival at the park ... to get people using Huddle Park as a park again" (Bega, 2007).
- In 2007, there was a protest organised against development at Huddle Park. This was organised through the Facebook group (Cox, 2007)

This list highlights some of the actions taken against the proposed development by the community groups.

Nature	Feelings in relation to the project	Status	-
Impact source(s)	The privatisation of public space		
Affected stakeholders	Local community		
Magnitude	Extent	Regional	
	Intensity	High	
	Duration	Long term	
	Reversibility	Reversible	
	Probability	Highly likely	
Significance	Without mitigation	Significance Rating (WOM) = (Extent + Intensity + Duration + Probability) x Weighting Factor $(3 + 5 + 4 + 4) \times 5 = 80$	H
	With mitigation	Significance Rating (WM) = Significance Rating (WOM) x Mitigation Efficiency Or $WM = WOM \times MH$ $32 = 80 \times 0.4$	L - M
Confidence	High		

Mitigation measures:

1. Should the development proceed, it should be in a low density format, with a large public open space element, to retain the 'green lung' feel of the area.
2. A forum should be established between the community and the developers in order to facilitate the sharing of ideas regarding how to take the project forward in a manner which both parties support.

Significance of the impact

Before mitigation measures occur, the impact is predicted to be high. If the mitigation measures are implemented, this will reduce the impact to low – medium.

8.9 Demand for retail

According to those interviewed in this SIA process, many community members feel that the retail sector is an unnecessary addition to an already unwelcome development. There are a large number of retail centres in the immediate vicinity and even more within a short driving distance. The HEAD league feels that the retail element adds to the overall lack of thought with which the project has been approached. This is due to the lack of demand that the existing centre opposite the KDLS currently experiences.

Mr Rundle believes that with the level of service available in the area and the large number of retail centres in the vicinity, a retail component is unnecessary. The stores in the area include a Woolworths, coffee shop, restaurants and a pub and small clothing retail stores adjacent to a petrol station with small convenience store. Opposite KDLS there is a Woolworths, restaurants and coffee

shop, also adjacent to a petrol station. This centre is currently struggling for business, despite being opposite the school.



Figure 7: Shopping centre opposite KDLS, showing vacant stores on both levels



Figure 8: Shopping centre opposite KDLS, highlighting empty store



Figure 9: 'To Let' sign outside shopping centre, with KDLS in the background

In the Senderwood area there is a small retail centre which has restaurants and a small convenience grocery element. There is also a retail centre opposite the Sandringham School. In a wider radius, there is the Greenstone Mall, Bedford Centre, Norwood Mall, Park Meadows, Eastgate and Balfour Park within the wider region. For this reason, with the exception of Mr Bagg and Mr Kruger, those interviewed feel that there is no need for further retail in the area, as it may lead to the other businesses closing. Mr Kruger believes that it may reduce the adverse traffic impact, while Mr Bagg believes that it will cater to the residents in the area.

KDLS does not have any issue with the proposed retail component. Mr Bagg indicated that the proposed retail component of the development may lead to the decline of the shopping centre opposite KDLS, but that this centre is currently mismanaged, and this is the cause for its failure.

The Saheti School is cautious of the retail, as they are concerned about what it will entail. The school have had issues in the past with advertising that is inappropriate for an area in which there is a school. This has led them to be concerned with the nature of the retail that will be allowed, and the nature of the advertising that takes place. It is important that, should the development go ahead, the retail component should be socially responsible and all tenants should adhere to certain standards that are befitting of an area in which there are many schools. Saheti School is concerned that their students will be drawn to the retail area, and it should therefore be responsible in the type of retail activity that occurs. However Saheti School would be interested in advertising at the centre should it go ahead.

However, the general need and desirability of the retail component should also be considered. The proposed development is expected to promote amenity and convenience as well as efficiency and economy based on:

- Pleasant shopping environment;
- Accessible and situated on a major road;
- Wider variety of shops;
- Reduced travelling distances; and

- Boost to the local economy.

In order to address any concerns the community may have, it will also be important during the operational phase for the property managers to attract consumers to the shopping centre, and in so doing, shopping preferences needs to be taken into account. The influencing factors can be summarised within a three level hierarchical model, which includes:

- **Level 1: Consumption values:**
 - Functional value: need for specific products and tenant mix;
 - Social value: place to interact;
 - Emotional value: to excite or relax;
 - Epistemic value: need to be stimulated, informed, to learn and to find out;
 - Conditional value: e.g. to shop for Christmas or a birthday;
 - Significant value: does the mall symbolise or signify the town centre;
- **Level 2: Consequences of shopping at a specific centre:**
 - Aspirational factors;
 - Ambience;
 - Convenience;
 - Belonging;
 - Cost;
 - Feelings;
 - Familial impact;
 - Historic factors;
 - Individual goal directedness;
 - New experiences;
 - Time awareness;
- **Level 3: Attributes of the shopping centre:**
 - Appearance;
 - People;
 - Layout;
 - Parking;
 - Time and money;
 - Retail requirements; and
 - Convenient location.

These aspects affirm that physical factors are but one dimension of consumer behaviour patterns. There is an increasing realisation that other factors are equally important, e.g. cognitive factors, emotional factors and experiential factors. Level one plays a dominant role in the sustainability of a centre, and hence, the importance to provide the correct tenant mix as part of the Retail Centre.

Based on modern shopping centre trends, the Retail Centre should consist of a mixture of shops selling:

- **Durables:** non-perishable products and specialty goods
 - Clothing (boutique), footwear and accessory stores;
 - Home and house ware shops;
 - Hardware / Do It Yourself;
 - Jewellery store;
 - Biltong store; and
 - Sweet store.

- **Non-durables:** fast moving or perishable products
 - Supermarket; and
 - Florist.
- **Services:** financial, medical, personal care, cell phone industry, etc
 - ATM;
 - Optometrist / doctor; and
 - Hairdresser.
- **Wine and dine:** restaurants and fast foods.

In terms of shopping patterns of households with higher incomes, the following shops are typically preferred and those which aren't already targeted should be targeted to form part of the tenant mix:

Usual grocery store:

- Full line Woolworths
- Pick 'n Pay
- Hypermarket
- Shoprite Checkers
- Spar

Usual clothing shops:

- Edgars
- Woolworths
- Foschini
- Truworths

Appliance stores:

- Game
- Dion
- Dischem
- Clicks

In addition to that mentioned above, the centre should comply with modern design standards, the centre should be up-market and of high quality. The shopping centre should also provide extended trade hours to cater for the afterhours demand from both the household and the business component of the market.

Should the proposed development go ahead, it is anticipated that the standard of living in the surrounding neighbourhoods will increase due to the increase in access to goods and services. If, however, the status quo is maintained, the area stands at risk of losing economic investment (public and private) to other more developed areas.

To increase the standard of living locally, the contractors employed should aim to ensure that local or surrounding people are employed where possible. It is furthermore suggested that all the employees should be motivated to spend their earned income locally. This can be achieved by ensuring that the goods and services required by the employees are provided for locally (if possible), so that they do not need to spend their money elsewhere. This would be the responsibility of local shop owners to supply that which is being demanded.

The increase in the population and purchasing power resulting from the proposed development will enable the formation and sustainability of new businesses. The establishment of new businesses in the area will have an additional positive impact on the increased standard of living during operation.

The employment of local residents during operation (as far as practically possible) would increase the standard of living, since they would have a higher disposable income and less transportation costs. The key responsible entities for managing / implementing this mitigation measure are the contractors and the local shop / business owners.

Development directly influences changes in employment and income opportunities in communities. Such changes may be more or less temporary (e.g., construction projects, or seasonal

employment) or may constitute a permanent change in the employment and income profile of the community should the development project bring long-term job opportunities for community residents (e.g. a commercial establishment).

The anticipated employment opportunities from the development, and those that will arise from new business sales, will bring much needed relief to the high unemployment figures in the area.. A reduction in the unemployment rate will have a direct impact on social impacts such as crime and poverty.

During the construction phase, the employment opportunities would be temporary in nature. The increased employment in the area will also result in increased expenditure, which will mean that more than just the proposed direct jobs required for the construction will be created due to the economic spin-offs. During the construction phase, there will be a demand for contractors, labourers, artisans, and service providers.

The benefit of increased jobs can also be translated into economic terms. The additional jobs would, in essence, result in additional income creation. This increase in income in the area can be translated into a specific impact ranging from Broad Based Black Economic Empowerment (BBBEE) to poverty alleviation depending on the procurement policy and the construction technology applied. It is anticipated that an increased number of previously disadvantaged people could be provided with an annual income. This will place them in the financial position to acquire all the goods and services that are required to maintain a basic level of living.

Assessing the changes in the labour market is also an important component of social impact analysis because growth in employment places additional demands on community services and resources. Employment creation often leads to the softening of negative social impacts such as illiteracy, the lack of proper healthcare or crime and violence.

Even though there will be reasonably large numbers of medium to long term employment opportunities available, there will also be an opportunity for many indirect business opportunities to be created.

Nature	Demand for retail (negative)	Status	-
Impact source(s)	The construction of a new retail centre		
Affected stakeholders	Schools, community, commuters		
Magnitude	<i>Extent</i>	Regional	
	<i>Intensity</i>	Medium	
	<i>Duration</i>	Medium	
	<i>Reversibility</i>	Reversible	
	<i>Probability</i>	Likely	
Significance	<i>Without mitigation</i>	Significance Rating (WOM) = (Extent + Intensity + Duration + Probability) x Weighting Factor (3 + 3 + 3 + 3) x 5 = 60	H
Confidence	High		

Nature	Demand for retail (positive)	Status	+
Impact source(s)	The construction of a new retail centre		
Affected stakeholders	Schools, community, commuters		
Magnitude	<i>Extent</i>	Regional	
	<i>Intensity</i>	Medium	
	<i>Duration</i>	Long term	
	<i>Reversibility</i>	Reversible	
	<i>Probability</i>	Likely	
Significance	<i>With mitigation</i>	Significance Rating (WM) = Significance Rating (WOM) x Mitigation Efficiency (3 + 3 + 4 + 3) x 5 = 65 26 = 65 x 0.4	L - M
Confidence	High		

Mitigation measures:

1. The retail centre should not remain open late into the night, which will lead to the possibility of a disturbance for the neighbouring community.
2. There should be strict security at the retail centre.
3. It is vital that the retail centre remain neat at all times and does not adversely affect the visual character of the area.
4. It is important that the retail centre caters for the needs of the residents and is not just specialty stores as this will alleviate some of the traffic impacts.
5. The lease agreements for the tenants must include a clause ensuring that their advertising is appropriate for the schools in the area.

In addition to the above, it is suggested that non-locals should only be hired when specialist skills, which are not available locally, are required and local business providing such skills cannot be created. The following aspects in this regard should receive priority:

- Labour based construction methods should be used whenever practically possible;
- Local residents and communities should be employed, wherever possible;
- Local construction companies should be used whenever possible, especially for subcontracting work; and
- Local suppliers should be used as far as possible.

Even though much of the employment created during the construction phase is of temporary nature, it will assist to provide an economic boost to the community. The use of local labour should be approached in such a manner that large numbers of residents benefit from this action rather than only a select few. In order to ensure that the resultant positive impact develop into a long term boost to the economy, it is suggested that, where possible, the developer advise and assist, in liaison with the local ward committee, local business operators to establish and grow SMMEs. The support of local business and the use of their products and services should be promoted as far as possible.

It is advised that fair employment criteria be used in sourcing employment from the surrounding areas, so as to avoid a situation whereby many unskilled and unemployed persons from the surrounding areas are not employed during construction, which can cause potential conflict.

Employment opportunities should however be communicated in a fair and transparent manner, while at the same time being sensitive not to create any expectations for employment.

Significance of the impact

Before mitigation measures occur, the impact is predicted to be a high negative. If the mitigation measures are implemented the impact will changed to a low to medium positive impact.

8.10 Demand for housing

The schools both feel that the housing could provide benefits. This is due to the fact that in order to remain competitive, the schools are required to offer housing to their staff. Thus both schools indicated that they would be interested in purchasing apartments as this would allow them to provide the housing without having to build it themselves. It is also in a convenient location for both the Saheti and KDLS Schools, and so would suit their needs. KDLS indicated that they would welcome smaller and more affordable housing units in the development, and not only a high income element.

The schools also indicated that they would welcome the additional families to the area. The schools rely on new families in the area who would send their children to the schools. The fact that there will also be smaller units means that younger families would be able to afford to move into the area, and thus potentially send their children to the schools. Furthermore the proposed development could provide an opportunity for families who are currently living far from the schools to relocate and thus save some time commuting. Both schools serve very specific communities, namely the Jewish (KDLS) and Greek (Saheti) communities and thus parents may live far from the two schools.

It is evident from the comments and responses received that there are members of the community and surrounding areas who wish to be kept informed about the developments progress as they are interested in investment opportunities on the site. It was reported that there is a general sentiment against the development, yet should it proceed, certain respondents who are opposed to it would consider purchasing property.

However the majority of the respondents interviewed, and those who commented in the scoping phase, do not feel that there is a need for the housing as there is a large amount of residential accommodation in the area at present. If the development were to proceed, the community would favour low density housing, as this will result in fewer adverse impacts such as traffic.

Nature	Demand for housing	Status	+
Impact source(s)	The necessity for additional high income housing in the area		
Affected stakeholders	Schools, Community, Commuters.		
Magnitude	<i>Extent</i>	Regional	
	<i>Intensity</i>	High	
	<i>Duration</i>	Permanent	
	<i>Reversibility</i>	Irreversible	
	<i>Probability</i>	Definite	

Significance	<i>Without mitigation</i>	Significance Rating (WOM) = (Extent + Intensity + Duration + Probability) x Weighting Factor $(3 + 5 + 5 + 5) \times 5 = 90$	H
	<i>With mitigation</i>	Significance Rating (WM) = Significance Rating (WOM) x Mitigation Efficiency With mitigation, will remain high positive	H
Confidence	Medium		

Mitigation measures:

1. The broader community should also be kept informed of the progress in terms of sale of units, should they be interested in purchasing property.

Significance of the impact

Before mitigation measures occur, the impact is predicted to be high. If the mitigation measures are implemented the impact will remain a high positive.

8.11 Increased pressure on physical infrastructure

It is important to understand the impact that the proposed development may have on the current level of physical infrastructure (roads, bulk water services, electricity, etc.) in the area. An increase in economic activity and population size could have implications for community infrastructure and service requirements.

The construction phase of the proposed development could cause an inflow, or an increase of construction workers, to surrounding areas. These workers would mainly consist of construction labourers and additional people who would be in search for employment. Due to the fact that labourers would need to be located near the development site, the provision of services, etc would be required. In addition, the actual construction of the development would require bulk services that would cause negative pressure to infrastructure if upgrades are not included in the development process.

During the operational phase of the development, more pressure would be exerted on infrastructure. All the proposed markets for the development would require bulk services such as water, sanitation and electricity.

According to Bill Rundle of the Ekurhuleni Municipality, there is a major backlog in services including roads, water and sewerage. David Bagg, who has undertaken the development of the Huddle Park Golf Course, indicated that there were five sewerage leaks on the portion of land that he has leased. At the time of the interview, these needed to be repaired, and serve to highlight that there is already a strain on the services in the area. It is important that the current quality of life and level of services of the existing community are be compromised as a result of the increase in residential units in the area.

Bulk services upgrades for the proposed development will take place as per Table 7:

Table 7: Confirmation of capacity to supply bulk services

<p>Water (Construction & Operational Phases)</p>	<p>Supplier: Johannesburg Water</p> <p>Approximately 783 kl (kilolitres) of water will be consumed daily by the proposed Huddle Township Development, resulting in a continuous demand of approximately 45.31 l/s (litres per second).</p> <p>A new connector line (200mm diameter, 1 380m long) from the Corner of Grant Road, along the Club Street servitude, to a connection point opposite Donne Avenue will be provided for the proposed development as the existing water pipeline in Club Street has been shown inadequate to supply the proposed development. The connection point is from an existing high pressure municipal supply line from the Linksfeld reservoir and it is indicated that a connection, in Club Street, can be taken from an existing Scour Valve, through a pressure reducing valve, to connect into a proposed 200mm diameter link pipeline, which will be piped jacked under Club Street and the reticulation of the township will be fed from a single point.</p>
<p>Sewage (Construction & Operational Phases)</p>	<p>Supplier: Johannesburg Water</p> <p>The proposed development will be served by waterborne sewerage, observing Johannesburg Water's standards throughout. It is estimated that the daily flow of effluent from the township will be approximately 608kl. Peak flow is based on 80% of peak water demand and is estimated at 35.19m/s.</p> <p>There is a major existing sewer main 1 500mm diameter pipeline located in the valley to the west of the proposed development. This sewer is a major collector for the area and drains from south to north. A 200m pipeline with a diameter of 200mm will be required to transfer effluent from the north western corner of the proposed development to the existing sewer main. A servitude across the Huddle Park Golf Course will have to be registered and it is proposed that the sewer line be jacked under the wetland and associated watercourse to avoid the impacts associated with open trenching.</p>
<p>Electricity (Construction & Operational Phases)</p>	<p>Supplier: City Power</p> <p>The capacity required by the proposed development is as follows: Residential 1 = 1,548kVA; High Density Development = 365kVA; Neighbourhood Node = 1,000kVA; Total of 2,913kVA x0.85 Diversity Factor = approximately 2,500kVA.</p> <p>To supply the proposed development, 2 x 185mm² x 3c copper XLPE 11kV underground powerline cables will be installed from the corner of Pretoria and Modderfontein Road (where it connects into the existing powerline from the Alexander Substation located further to the north), south along Modderfontein Road, then east along Club Street, to a 6x3m site situated along the eastern boundary of the proposed development. From this point 2 x MV cables will continue to the Residential 3 component and Neighbourhood Node stands.</p>
<p>Gas (Operational Phase)</p>	<p>Supplier: Egoli Gas (Pty) Ltd</p> <p>Arrangements have been made with Egoli Gas for a connection to the existing Egoli Gas pipeline to the west of the proposed development. The proposed gas line (110mm diameter) crosses the wetland and associated watercourse to the west of the proposed development and will be jacked under this system to limit disruption as a result of trenching.</p>

<p>Solid Waste (Construction & Operational Phases)</p>	<p>Construction Phase: The Contractor will be responsible for the management and removal of all solid waste (refer to the Environmental Management Programme (EMP) in Appendix 8).</p> <p>Operational Phase: All waste (glass, plastic, paper) generated on site will be recycled as far as possible – managed by the proposed HOA. General waste, not recycled, will be collected on a weekly basis for removal by an appointed registered waste removal company or the Local Municipality.</p>
<p>Stormwater Attenuation</p>	<p>It is proposed that full attenuation of stormwater will be facilitated within the proposed development footprint. A large number of attenuation facilities have been proposed throughout the development’s open space system. The “wet” ponds are estimated to cover approximately 13 000m², thus the attenuation required can therefore be accommodated in a freeboard of between 400-500mm depending on the locality and routing of stormwater flows. Attenuated stormwater will then be discharged into the surrounding Huddle Park Golf Course area. Stormwater attenuation within the Neighbourhood Node (retail/ business component) and Residential 2 and 3 components (i.e. cluster and apartment housing areas) will be provided by way of underground tanks sized at 2 200m³ and 620m³, respectively.</p> <p>The underground stormwater system will be designed to intercept the 1:5 year storm and routing of the 1:25 year storm will take place throughout the development and will be directed towards the attenuation facilities. The attenuation facilities will be designed to reduce the outflow from the entire development to the 1:5 year pre-development flow.</p>

Based on the above information, there is a clear indication that bulk services will be upgraded in order to withstand the additional anticipated impact on existing services. These services will have to be upgraded as per the Environmental Authorisation, should approval be granted for the proposed development. It should however be cautioned, that should the development go ahead, without any of the necessary upgrades taking place, this impact could have potentially detrimental consequences for the local community.

Mitigation measures:

A method of softening development impacts is to take steps to ensure that the needed public services and capital facilities are in place before the peak construction occurs. This is in order to ensure that demand for these services do not exceed supply. It is crucial that the provision of the infrastructural services be integrated with the economic needs of the community.

The developers and the municipality should therefore proactively plan, and aim to provide enough infrastructure and services to meet the maximum potential of the development in terms of service and infrastructure demand.

It is anticipated that the proposed development will lead to increased pressure on infrastructure in the area. It is suggested that the relevant authorities, and bodies involved in the supply of bulk services for the proposed development be informed, in order to ensure that it gets incorporated into their demand projections.

The key responsible entities for managing / implementing this mitigation measure are the authorities (town planners, engineers and environmental officers) from the affected local municipality, the developers and the contractors.

Significance of the impact

Before mitigation measures occur, the impact is predicted to be medium – high, depending on the extent to which the various infrastructure and service elements are disrupted. If the mitigation measures are implemented the impact will be reduced to low - medium.

9 CONCLUSION AND RECOMMENDATIONS

A wide variety of issues and concerns has been identified through the SIA. These are diverse in nature and extend from broad environmental issues such as public open space – which are difficult to quantify and measure; to issues such as traffic, noise and dust impacts which are more measurable.

There will be a number of areas in which mitigation will be required during the construction phase. These include noise and dust, and the impact that the construction vehicles will have on the traffic. There is also a concern regarding the effect that the influx of workers to the area will have on crime in the neighbouring areas.

The loss of community and open space, with the associated impact on the community's sense of place is an issue that has been highlighted throughout. This will be the result of the altered visual nature of the area. This is in terms of the loss of trees and open space, as well as the impact the construction of the housing and retail centre will have on the community.

The schools will be temporarily affected by the increased traffic, which will heighten the congestion issues they already face. However, they stand to benefit from the increased number of school going families in the area, and from the potential for staff housing in the residential component of the estate as well as potential for additional parking. In terms of the schools, it is important to seek creative solutions to ease their traffic congestion. This will also provide a safer environment for the school children. It may also assist the developer to be seen to be more socially responsible in the community. What has been a largely adversarial relationship between the developer and community should be redefined and a mutually beneficial solution should be sought, should the development go ahead. This could be achieved through a forum in which the parties engage with each other, and are able to exchange ideas. Importantly, the provision of the necessary information regarding the legality of the transaction is vital to ensuring that this is possible.

The impact on the current traffic situation in the area is of concern, as Club Street is a major regional road and is already highly congested. The impacts on traffic are predicted to be significant and adversely affect a large number of people – beyond the immediate community. This is due to the large number of commuters who use this route. There needs to be greater clarity on issues such as the timing for the various mitigation measures – notably the traffic mitigation. It is also vital to establish whether the mitigation measures proposed are comprehensive enough for a problem that appears to be a significant issue at present. Furthermore the mitigation measures must necessarily be able to be implemented and thus be appropriate and achievable, as well as being able to be monitored.

As well as the impact on roads, and requirement that they be upgraded in order to manage the impact of the development, there is a concern that the rest of the infrastructure will also be put

under strain. There are large maintenance backlogs and existing incidents of burst pipes which are an area of concern. This may represent a fatal flaw if the infrastructure is simply unable to cope with any additional impact and development. As the land is currently zoned as public open space, it is unlikely that substantial upgrades to infrastructure have been planned for the area by either CoJMM or the EMM.

Based on the impacts identified and the measures that could be implemented to mitigate (or enhance) these impacts, it is suggested that the proposed project proceed under the following conditions:

Interaction with existing community forums

It is recommended that an existing community based organisation and / or non government organisation in the surrounding area be used to serve as a communication channel between the community and the developer. These organisations should for example include representatives from civil society, ward councillors, local business, construction teams and the developer. Liaison with such committees will play an important role in executing some and monitoring most of the proposed mitigation measures.

In addition, it is advised that an ECO be appointed to ensure that the requirements of the EMP be met and adhered to.

Labour recruitment

Labour should, as far as possible, be sourced locally during the construction and operational phases of the project. This will minimise the risk of conflict among local residents and newcomers, and obviate the need for developing temporary housing for workers.

It is expected that there will be a limited influx of newcomers in search of employment. Therefore, it is suggested that labour guidelines be drafted in terms of employing local residents. These labour guidelines should include clauses with regard to ensuring the timely payment of labourers.

Employment criteria should be communicated to the community in advance (e.g. in newspapers).

It is important that the local community should under no circumstances be exploited. If they are employed, they should receive proper contracts in accordance with the Labour Relations Amendment Act, 2002 (12 of 2002).

Crime and violence

The possibility of crime escalating in the study area is always of concern and it is advised that all sectors of the community become involved in community policing. Local authorities and ward councillors should be made aware of the impact that the influx of new people can have on services, such as housing, or the effectiveness of the police in the area.

Local economy

It is strongly recommended that local businesses be supported in sourcing materials or services. Local shops, caterers, transport companies and various other SMMEs should be supported, wherever possible. Should it be required, the local ward committee member can assist in providing the developer with a list of service providers within the study area.

Consultation

Community consultation throughout the project is imperative and the community and the developer should work together to obtain the best solution.

Unwanted social behaviour

If and where possible, the developer should liaise with the local government, local institutions and or existing community programs to assist in the implementation of health awareness programs and policies, for example HIV / AIDS awareness and policy programmes or education on the prevention of teenage pregnancies, etc. This will also contribute to capacity building within the local area.

Transfer of skills

It is likely that skills transfer would occur with the creation of additional employment. Skills transfer is required to take place to ensure that local labourers are not being used merely as unskilled labourers. The use of diverse activities should be stimulated, allied to, but not reliant on, construction related activities such as outsourcing catering activities to local businesses. The local municipality could specifically play a role in ensuring that the local residents and business owners are ready to obtain the most benefit associated with the spin-offs emanating from the proposed development. For enhanced social benefit, stakeholders should be mutually accountable for increased opportunities regarding skills and competency development (general education and technical training). In order to ensure the appropriate skills transfer, it is suggested that the developer and / or the contractor's identify the required jobs to be undertaken prior to the construction phase. It will then be possible for local recruitment and / or some form of basic training to follow. It is also recommended that a comprehensive program for recruiting, hiring, training, orienting and counselling be established. Lastly, it is important to follow the principles of the Expanded Public Works Programme and apply effective labour-based construction technologies in order to increase the job creation effects.

Need and desirability

In order to increase the desirability, it is suggested that the proposed development be developed into a quaint atmosphere surrounding the natural appeal, and serenity of the area. It will also be important during operation for the property managers to attract consumers to the shopping centre, and in so doing shopping preferences and various influencing factors needs to be taken into account such as physical factors, cognitive factors, emotional factors, experiential factors, etc. It will also be important for retail managers to provide the correct tenant mix as part of the shopping centre. The centre should also comply with modern design standards, be up-market and of high quality. The shopping centre should also provide extended trade hours to cater for the after-hours demand from both the household and the business component of the market, in particular the food hall, restaurant etc.

Increased pressure on infrastructure

A method of softening development impacts is to take steps to ensure that the needed public services and capital facilities are in place before the peak construction occurs. This is in order to ensure that demand for these services do not exceed supply. It is crucial that the provision of the infrastructural services be integrated with the economic needs of the community. The developers and the municipality should therefore proactively plan and aim to provide enough infrastructure and services to meet the maximum potential of the development in terms of service and infrastructure demand. It is suggested that the relevant authorities, and bodies involved in the supply of bulk

services for the proposed development be informed, in order to ensure that it gets incorporated into their demand projections.

General

During construction, mitigation is required to ensure that the adjacent properties are well informed of the proposed development so that uncertainties, and perceptions regarding increasing crime levels, etc are dealt with. Furthermore, in order to enhance the positive impacts of this development during operation, it is relevant to note that the success of the proposed development is dependent on good management. Should the development be untidy, not well maintained and unable to attract potential investors to the area, the likelihood of positive impacts will diminish. The implementation of the following guidelines during operation will increase the positive impacts on adjacent areas:

- Management of crime, grime and general environmental disorder;
- Rehabilitation, maintenance and enhancement of the open space and asset base in the area;
- Creation of a positive identity and known future use for the area; and
- Attracting continued investment and development.

The monitoring of the development by maintaining it in the form of provision of supplementary services that include safety and security patrol officers, pavement cleaning, litter collection, maintenance of public space, removal of illegal posters and etc, would promote the good functioning of the development. It is suggested that, in the interest of the adjacent property owners, controlled access and usage of the open space be permitted.

Finally the mitigation measures highlighted throughout the document should be implemented and, where this does not occur, it is necessary to reassess the impact on the community and environment. The mitigation measures effective implementation is vital in ensuring that the project does not lead to adverse effects, should the project proceed.

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10.1 List of interviews

Ward Councillor (COJMM)	Mr Steven Kruger	City of Johannesburg, Ward Councillor (Ward 72)
Interested and Affected Parties	Mr David Bagg	Huddle Park Golf course
Interested and Affected Parties	Ms Marian Laserson	Resident
Interested and Affected Parties	Daryl Fuchs	Friends of Huddle Park
Community Based Organisations	Anonymous Individual	Active in a community based organisation
Non Governmental Organisation	Ms Judith Taylor	EarthLife Africa Joburg
Ward Councillor (Ekurhuleni MM)	Mr Bill Rundle	Ekurhuleni Ward 19
Community Based Organisations	Mr Benjy Shulman	HEAD league
Schools	Rabbi Craig Kacev	King David Linksfield School
Schools	Ms Tonia Yiannoulakis	SAHETI School

11 APPENDICES

Appendix one: Newspaper articles

2 SATURDAY STAR
November 26 2006

1 NEWS

Battling to save their park

PICTURE: ANTON HANNIGER

Huddle Park residents staunchly opposed to development plans

BY CHRISTINA GALLAGHER

The battle to save Huddle Park is raging once again as local residents get ready to take on the city and developers planning to build an exclusive multi-billion-rand shopping, residential and golf complex.

If the developers, the Tiyani Group – a consortium comprising Investec Bank, Standard Bank, Global Capital, PEU Investment Property and Shanduka Properties – have their way, they will build 800 estate houses, 600 luxurious flats, a hotel, an exclusive 18-hole golf course and an entertainment complex.

A public golf course is expected to open in Frankeawald and an upgrade will be done at the Pimville, Soweto, course. But local residents say they don't need another golf course or entertainment centre, and they want to keep their community's public open space.

As land becomes a hot commodity in Johannesburg, developers scout open spaces throughout the city looking for suitable property.

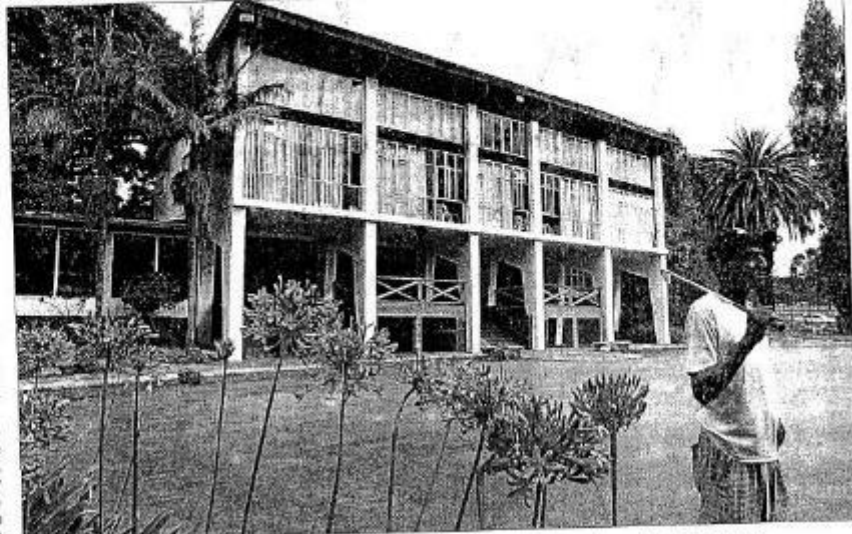
Councillor Carol Milner said there has been pressure by the city council to develop open spaces in her ward, which includes Huddle Park. "Developers are only interested in how much money to make. They are not concerned with what is best for the community."

She added: "It is criminal to take what belongs to the people. We need parks and recreation areas."

Since 1997, residents whose homes border this Linksfield property in western Johannesburg, have been fighting off developers. First, Malaysian developers wanted to build a casino. Then the National Sports Council had plans in 1998 – and now the Tiyani Group has appeared.

One concerned resident, Marian Leserson, said: "So we lose three public golf courses and get another golfing estate. We lose the jobs of 80 caddies and grounds workers, a school for turf management – which trains disadvantaged youngsters in creating and managing sports facilities – and a place for youngsters to learn and play golf, at a reasonable cost."

Playing at Huddle Park is a bargain compared with other golf courses nearby



Last days? ... if Huddle Park is torn down, the public golfcourse will go, along with its clubhouse.

that charge upwards of R10 000 a year for membership. The municipal golf course charges about 10% of that price and a mere R500 for women. Nearly 1 000 members belong to the golf course, say golf academy managers.

But it is not only development that residents are against.

It is also the protection of land they believe contains precious wetlands. Paul Fairall, a resident and environmental consultant, said that for the past 36 years he had been conducting research on the Huddle Park area. He said the wetland acted as a "natural biological purification system".

About 80% of the area has exotic plants and the rest are indigenous species. Honey badgers, blue cranes, velvet monkeys and hedgehogs call the area home.

Fairall said water-table levels at the park were on average 6m below ground and some levels reached to 8m.

If additional concrete structures are built on the land, the water will have to go somewhere. "It will have to go the lowest point, which is the adjacent property on the Rietfontein side. The water will flow down to the graves that are there, and then into the Jakskei River." The water could be tainted by overflow from these graves,

many of animals and people who died from smallpox and anthrax.

"My greatest fear is that it will affect the 300 000 children and adults who play and wash in the river daily."

The residents are also complaining that full environmental impact assessment was not done before the tender process was conducted in mid-2004. A preliminary assessment was commissioned by the city council in January last year, to be carried out by Setplan Consortium, and its report found that "the site is characterised by exotic and invasive vegetation, some of which should be removed by law".

Increased traffic to the already congested area is another concern. The preliminary assessment report found that vehicle exhaust fumes from the N3 highway during peak traffic times contributed to pollution and that "this air quality could eventually affect human health and sensitive vegetation".

Development does not only concern residents and developers; it also has the caddies at Huddle Park worried. Some have been there for more than 60 years. Others, like Joseph Moeng, grew up around the park and now see it as a refuge. Moeng, who has been a caddie there since 2002, recalls playing soccer in Huddle Park with the patrons

and caddie children.

In the 1980s, he served a stint in prison, what he says was payback for his political activism. When he was released in 1986, he took up golf. If not for a municipal golf course like Huddle Park, disadvantaged people such as Moeng might not have had a chance to learn the game.

In his free time, Moeng practices the game with eight golf clubs he received from players' donations, and used ones he has picked up for R10.

Moeng said Huddle Park was important to the children of the area because it was the only place they had been allowed to play. "We will lose out on future stars if this place closes."

It is also important to his fellow caddies, who Moeng said often have no other homes and sometimes sleep under the park's trees at night. "If they build houses here, what will happen in our lives?"

Two official objections to the plan have been lodged. Yesterday was the deadline for objections to the "proposed closure alienation of part of Huddle Park property". December 12 is the deadline for a second round of objections to the proposed establishment of the township.
cga@star.co.za

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Set Nov 17 2007

SATURDAY STAR

Huddle Park fans turn to Facebook

Sheree Béga

A young Bedfordview man has taken his battle to save Huddle Park, Joburg's largest remaining public open space, to the popular social networking site Facebook.

Daryl Fuchs's Huddle Park group on Facebook boasts more than 700 members, who discuss the "general scourge of destruction of our green spaces" in Joburg and Huddle Park - which is under imminent threat of development - in particular

The Joburg council plans to develop Huddle Park - a wetland area and the city's only public golf course - into an exclusive R3-billion residential golfing estate complete with 1 000 luxury units, a boutique hotel, shopping complex and private Gary Player signature golf course.

But this is a "heavenly plan from hell", according to Fuchs (28). "It's a valuable green space in Joburg. I know we have a lot of trees but actual green spaces where people can run around, enjoy the sun and play frisbee? We have precious little of that."

"We need more of these green spaces - not less. It's absolutely ridiculous that developers are grabbing every bit of green space available. They should rather be targeting the city centre."

"This is my park. It's everybody's park. It's a valuable asset that the people of Joburg are going to lose. When did we give the Joburg council the mandate to sell our parks?"

Huddle Park has fallen into disrepair but isn't beyond hope, he pointed out. "We need an injection of money to upgrade it. We can put in a restaurant and

better parking facilities ... instead of just allowing developers to make a quick buck ... and turning our park into a shoppers' paradise."

Fuchs' passion for the park is optimistic and proactive. He has organised a family-day festival at the park next Saturday. "We want to create a party in the park, to get people using Huddle Park as a park again."

He said donations are welcome to cover the costs of the event, which will feature food and craft stalls, drum circles as well as local bands.

The Saverby Independent April 11 1999

Gauteng's green lungs splutter in cloud of development

by Margot Cohen

Public open spaces are being eroded in Gauteng. The government's policies are creating jobs and building houses, so perhaps municipal parks and "green lungs" are merely luxuries of the past.

Questioning whether that is the case, Flo Bird, the veteran conservationist, says: "If parks are luxuries, what about libraries and museums?" She notes that there is an absence of legislation to protect public open spaces in urban areas.

Kenny Pihla, the ANC's chairman of the "transformation kagotla" which aims to change the way Johannesburg is managed, says through privatisation and the commercialisation of facilities and green lungs such as the city's zoos residents' rates can be used to pay for parks and libraries.

In the meantime, residents whose homes and green areas are not giving up. Huddle Park, Johannesburg's only municipal golf club, where a round costs R25, has become the focus of a bitter quarrel.

Contesting plans to develop the club are two groups, Huddle Park Environs and the Anti-Degradation League (Head). Raymond Druker, Head's chair, says the lease for the club which the Greater Johannesburg Metropolitan Council (GJMC)

is about to sign with the National Sports Council (NSC) does not take into account the opposition of locals.

The lease permits the erection of a 270-bed housing development consisting of 249 units on the south-western side of Huddle Park. The up-market, two-storey homes are to be priced between R400 000 and R700 000. "It could become the thin end of the wedge for unnecessary development," says one resident.

Calissa Whitehead, the head of sustainable development planning at the GJMC, says the houses will blend with the others in the suburb. In terms of an arrangement made years ago, the NSC's proposal had been made a priority.

Huddle Park is run down and the GJMC cannot afford the R2 million a year needed to maintain it, in terms of its pending lease, the NSC will manage and administer the club.

The GJMC says Huddle Park must remain an affordable public facility; the NSC says it wants to turn it into a leading golf centre to promote the development of the game.

Druker charges that the land is being given away without guarantees. "The scheme was bulldozed through, but we opposed it with court interdicts all the way. The impact it will have on the area has not been measured."

Whitehead says Huddle Park will

be made into two golf courses, both public facilities.

One would have subsidised rides and the other would be a golf academy with a driving range and a pro programme for disadvantaged pupils.

Close to Huddle Park lies Kensington golf course, with facilities of an international standard. It has been sold to Winelands Properties.

There is little residents can do

locals to "save our golf course".

Further north, the hallowed grounds of the Inanda club will soon have 30 000m² of offices on its western boundary - a case of "land use" accessibility apparently.

Archie Dreyer of the Democratic Party says privatisation is the "buzzword" at the GJMC, but there are restrictions. Not all private open space could be rezoned easily.

If the council decides to privatise or sell parks, they still face town planning rules.

Moreover, public participation usually meant the authorities could not ride roughshod over the views of residents.

Town planning bodies sometimes approve rezoning applications without considering the sensitivity of green areas, or show insufficient appreciation of the impact of allowing development on them.

Dreyer says open spaces and green lungs give life to the city especially with the council's densification being the order of the day.

Another green lung under threat is the 30ha of Inat Kiefontein hospital is situated on. The hospital, close to Alexander township, is the only centre specialising in infectious diseases in Gauteng.

The land, which abounds with rare grasses and unique bird life, is also earmarked for development.

Nicolaus Louw, of the Gauteng department of developmental planning, says a joint venture between the Gauteng health department and the national department of public works is being explored.

Louw considers it a development comprising an office park, a retail centre and a range of housing for high and low-income groups.

Friends of Kiefontein (FOK), a pressure group keen to preserve the pristine grasses on the site and use the site for off-road cyclists, says the land has become a dumping ground and that the hospital is run down.

Kiefontein's buildings go back more than 100 years and victims of anthrax and other diseases inhabited on its grounds.

Louw says the facility will ultimately be revamped.

However, Marian Laseerson of FOK and others concerned about the future of the hospital where tuberculosis and HIV patients are treated, said a public participation exercise that was held had merely paid "lip service" to their worries.

Louw says the development plan under consideration allows for a vast area of Kiefontein's land to be retained as a green lung.

Before any definite development application could be lodged, a thorough environmental impact assessment would have to be made

Johannesburg's only municipal golf club, Huddle Park, is the focus of a bitter row

about the imminent disappearance of this green lung, as it is privately owned. Soon the Eastern Metropolitan planning tribunal will hear an application to build a shopping centre, an office park and townhouses on the site. The golf course lies adjacent to the Eastgate shopping centre.

If approved, the development may begin in the latter half of this year, despite vociferous pleas from

Residents still waiting for Huddle Park response

NE Tribune
20/11/98

Kim Thornton

COMMUNITY members have still not received replies to their objections about the Huddle Park golf course development proposal - almost two months from the September 14 deadline.

Chairman of the Huddle Park and Environs Anti-Degradation (HEAD) League Raymond Druker said, "I think it's ridiculous. They received over 300 objections, how are they going to consider them?"

Mr Druker said in addition to the objections he had sent a letter to the council's attorneys on September 25 with a number of issues he required answers to. On October 30 he sent a follow-up letter asking why they had not yet replied to his

previous letter.

Executive officer sustainable development planning for the metro, Melissa Whitehead, said she had given her replies to the council's legal department several weeks ago in order for them to give a legal perspective and then send the replies to the objectors.

However, executive officer for constitutional human rights and legal services, Puli Moloto, said the answers had been completed, but, according to the Local Government Transition Act, needed council approval.

She said Exco would meet this week and should they approve the responses these would be sent off the same day.

