

Appendix E6
Comments & Responses Report

The bottom portion of the page features a decorative graphic consisting of several overlapping geometric shapes. On the left, a large grey triangle points downwards. To its right, a red triangle points upwards. Further right, a light grey triangle points downwards. A red triangle on the far right points upwards. The overall effect is a dynamic, abstract composition of primary and neutral colors.

PROPOSED EXPANSION OF SPORTS AND RECREATIONAL FACILITIES AT THE COUNTRY CLUB JOHANNESBURG, GAUTENG PROVINCE
(Reference.: GAUT 002/22-23/E3247)

COMMENTS AND RESPONSES REPORT

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The Basic Assessment (BA) process, in accordance with the Environmental Impact Assessment (EIA) Regulations, 2014, as amended, for the Expansion of Sports and Recreational Facilities at the Country Club Johannesburg – Woodmead was initiated **Tuesday 15 March 2022** by placing site notices within the affected property. A notification letter was sent on **Monday, 06 June 2022** which served to invite Interested and Affected Parties (I&APs) to register their interest in the project and to submit any comments / queries that they might have.

The Draft BA Report was made available for a 30-day review and comment period from **Monday, 06 June 2022** to **Thursday, 07 July 2022**, and all written comments received during the initial 30-day review and comment period have been included in the table below and included in **Appendix E6** of the BA Report. Comment on the Draft BA Report was received from the Gauteng Department of Agriculture and Rural Development (GDARD) on **30 June 2022** where the Department advised that Activity 15 of Listing Notice 3, which among other activity components, includes institutional use, should be applied for in relation to the zoning of the site as well as the geographical areas existing on site. The Department further advised that registered I&APs be duly informed of the inclusion of this activity and that the application form be amended to consider the inclusion of this additional activity.

The Draft BA Report was revised and made available for an additional 30-day public participation period from **Thursday, 14 July 2022 – Monday, 15 August 2022** on the Savannah Environmental website – (<https://savannahsa.com/public-documents/other/>). No comments from I&APs were received during the additional 30-day public participation period of the Revised Draft BA Report. This Comments and Responses Report is included as **Appendix E6** to the Final BA Report submitted to the Competent Authority for review and decision-making.

LIST OF ABBREVIATIONS / ACRONYMS

BA	Basic Assessment	GDARD	Gauteng Development Agriculture and Rural Development
EA	Environmental Authorisation	I&AP	Interested and Affected Party
EIA	Environmental Impact Assessment		
ESA	Ecological Support Area		
EMP	Environmental Management Programme		

1. COMMENTS SUBMITTED DURING THE INITIAL 30-DAY REVIEW AND COMMENT PERIOD OF THE DRAFT BA REPORT

1.1. Organs of State

No.	Comment	Raised by	Response
1.	<p>1. Description of the development</p> <p>The development entails the proposed expansion of sport and recreational facilities on Portion 433 of the Farm Rietfontein IR 2, Woodmead, City of Johannesburg Metropolitan Municipality</p> <p>1.1. The activity entails the construction of additional tennis courts and new padel courts, upgrading the existing building at the facility to include a gym, changerooms, squash courts, expanding the parking area, upgrading the restaurant and bar to make it a multi-sport and family facility for the members of the Country Club Johannesburg.</p> <p>1.2. The property size measures at approximately 2,47 hectares with a development footprint of 1,30 hectares.</p> <p>1.3. The project site is zoned Private Open Space.</p>	<p>Tjatja Mosia</p> <p>GDARD</p> <p>Letter dated:30 June 2022</p>	<p>This comment is noted, and no further action is required.</p>
	<p>2. Applicable legislation and policies</p> <p>The activity entails the proposed expansion of sports and recreational facilities situated on portion 433 of the Farm Rietfontein IR 2, Woodmead, City of Johannesburg Metropolitan Municipality has an impact in terms of:</p> <p>2.1. National Environmental Management Act, 1998 (Act No 107 of 1998 as amended)</p> <p>2.2. National Environmental Management Biodiversity Act, 2004 (Act No.10 of 2004)</p> <p>2.3. Natural Heritage Resources Act,1999 (Act No.25 of 1999)</p> <p>2.4. All relevant Provincial Regulations, municipal by-laws and ordinances and the Gauteng Provincial</p>		<p>This comment is noted, and no further action is required.</p>

No.	Comment	Raised by	Response				
	<p>Environmental Management Framework ,2015, with the latter identifying the proposed site as falling within the Environmental Management Zone 1 (Urban Development Zone). This zone aims to promote development infill, densification and concentration of urban development within the urban development zones.</p>						
	<p>3. Description of the receiving environment The following environmental attributes and activities can be found on the site: 3.1. The Gauteng Conservation Plan Version 3.3 indicated that portions of the project area overlap with an Ecological Support Area (ESA). Several depressions/pans an unchanneled valley bottom wetland, and a channeled valley bottom wetland (the Sandspruit River) located approximately 1km west of the project area. 3.2. The project area is situated within the Egoli Granite Grassland of the Mesic Highveld Grassland Bioregion and is categorized as Critically Endangered.</p>		<p>This comment is noted, and no further action is required.</p>				
	<p>4. Listed activities applied for The following listed activities have been applied for</p> <table border="1" data-bbox="215 943 891 1366"> <thead> <tr> <th data-bbox="215 943 555 1050">Activity No and description</th> <th data-bbox="566 943 891 1050">Description of the development related to the listed activity</th> </tr> </thead> <tbody> <tr> <td data-bbox="215 1054 555 1366"> <p>Listing Notice 3 Activity 12 The clearance of an area of 300 square meters or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance</p> </td> <td data-bbox="566 1054 891 1366"> <p>-1.3ha of indigenous vegetation will be cleared - the project area falls within an Ecological Support Area and Critical Biodiversity area.</p> </td> </tr> </tbody> </table>	Activity No and description	Description of the development related to the listed activity	<p>Listing Notice 3 Activity 12 The clearance of an area of 300 square meters or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance</p>	<p>-1.3ha of indigenous vegetation will be cleared - the project area falls within an Ecological Support Area and Critical Biodiversity area.</p>		<p>Activity 15 of Listing Notice 3 has been included in the revised application for Environmental Authorisation (EA) submitted to the Department on 14 July 2022. As per the Department's recommendation, the BA Report has also been revised and is made available for a 30-day public review and comment period from Thursday, 14 July 2022 – Monday, 15 August 2022 on the Savannah Environmental website - (https://savannahsa.com/public-documents/other/). Furthermore, a letter notifying registered I&APs of the inclusion of Activity 15 of Listing Notice 3 was distributed on 14 July 2022.</p>
Activity No and description	Description of the development related to the listed activity						
<p>Listing Notice 3 Activity 12 The clearance of an area of 300 square meters or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance</p>	<p>-1.3ha of indigenous vegetation will be cleared - the project area falls within an Ecological Support Area and Critical Biodiversity area.</p>						

No.	Comment	Raised by	Response
	<p>purposed undertaken in accordance with a maintenance management plan</p>		
	<p>The Department would like you to consider if Activity 15 of Listing Notice 3, which among other activity components, include institutional use should be applied for in relation to the zoning of the site as well as the geographical areas existing on the site. The Department is of the view that such activity should be applied for and as such, necessary public process and amendment of the application form should be considered for the additional activity.</p>		
	<p>5. Specialist studies The heritage impact assessment was undertaken for the project and found that there is no significant heritage value to the property and the surrounds of the project area. The land was purchased in 1996 and classified as farmland, the property has no heritage structures or signs of heritage landscape. The property has since evolved into a recreational complex with two golf course and several other outdoor sporting facilities.</p> <p>The terrestrial Ecology Impact Assessment noted that the project contains numerous important floral and faunal specialist and is under threat from several alien invasive plants</p>		<p>This comment is noted, and no further action is required.</p>
	<p>6. Impacts Identification, Assessment and Mitigation The project area' biodiversity status is largely degraded and as such is assigned a sensitivity rating of 'very low' to 'medium'. The soil identified within he project area were found to have moderately low to moderate land</p>		<p>This comment is noted, and no further action is required.</p>

No.	Comment	Raised by	Response
	<p>capability. The portion of the property intended for development has largely been developed already.</p>		
	<p>7. Assessment of alternatives No property alternatives were considered, as the project area is located within the boundary of the Country Club Johannesburg. Furthermore, no alternative locations within the boundary of the Country Club Johannesburg were considered as the proposed development is an expansion of current facilities.</p> <p>No activity alternatives for the project area have been proposed by the applicant, due to the increase in people signing up to be members of the Country Club Johannesburg, there has been a strain on the current available facilities and such, the need for additional facilities has been identified.</p>		<p>This comment is noted, and no further action is required.</p>
	<p>8. Maps, layout plans, services route positioning The department notes the locality, layout and facility illustration project titled R14-RAJ_01(2021/11/15) maps in the report. They must still be attached in the final report. The minimum mapping rules must still apply as per GDARD requirements. There are existing tarred roads within the facility that will be utilised to provide direct access to the project area. The project site has electricity (Eskom) and there are already existing ablution facilities at the Country Club Johannesburg, which are connected to the municipality sewage line.</p>		<p>This comment is noted, and no further action is required.</p>
	<p>9. Public Participation Process The department notes that the drafted report circulated to the public for comments placement of sites notices within the project area in accordance with the requirements set in the EIA Regulations has been satisfactory positioned. A</p>		<p>It is acknowledged that the placement of the site notices has been satisfactory to the EIA Regulations.</p>

No.	Comment	Raised by	Response
	<p>newspaper advertisement was placed in the <i>Sandton Chronicles</i> on 06 June 2022. Any further comments and responses from key stakeholders including proof of consultation must be in the Final report. Kindly take note of the paragraph relating to the inclusion of Activity 15 of Listing Notice 3 and ensure that registered interested and affected parties are duly informed and its inclusion.</p>		<p>All comments received from key stakeholders, including proof of consultation, has been included in the Revised BA Report as Appendix E.</p> <p>Activity 15 of Listing Notice 3 has been included in the revised application for Environmental Authorisation (EA) submitted to the Department on 14 July 2022. As per the Department's recommendation, the BA Report has also been revised and is made available for a 30-day public review and comment period from Thursday, 14 July 2022 – Monday, 15 August 2022 on the Savannah Environmental website - (https://savannahsa.com/public-documents/other/).</p> <p>Furthermore, a letter notifying registered I&APs of the inclusion of Activity 15 of Listing Notice 3 was distributed on 14 July 2022.</p>
	<p>10. Environmental Management Programme (EMPr) The attached EMPr (Appendix H) is noted and appears addressing impacts that may arise as a result of the proposed activity; however, it must be included in the final report and must be practical, site specific and easily enforceable. An EMPr is a binding document and all the conditions in it should be enforceable, it is therefore important that words do not emphasize enforcements be avoided.</p> <p>If you have any queries regarding the contents of this letter, please contact the official of the Department using any of the above indicated contact details.</p>		<p>The EMPr is included within this Revised BA Report as Appendix H and will also be included within the final BA Report submitted to the Department for consideration.</p>

1.2. Key Stakeholders and I&APs

No comments have been received yet