

Appendix E7
Comments from I&APs on BA Report





GAUTENG PROVINCE
AGRICULTURE AND RURAL DEVELOPMENT
REPUBLIC OF SOUTH AFRICA

Reference: GAUT 002/22-23/E3247
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Dear Mmakoena Mmola,

COMMENTS ON THE "DRAFT" BASIC ASSESSMENT REPORT: THE PROPOSED EXPANSION OF SPORTS AND RECREATIONAL FACILITIES AT THE COUNTRY CLUB JOHANNESBURG, CITY OF JOHANNESBURG METROPOLITAN MUNICIPALITY

Regarding the above-mentioned Basic Assessment Report ("Draft") received by the Department on 07 June 2022, herewith receive the comments from the Department.

1. Description of the development

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.

- 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.
- 1.2 The property size measures at approximately 2,47 hectares with a development footprint of 1,30 hectares.
- 1.3 The project site is zoned as Private Open Space.

2. Applicable legislation and policies

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:

- 2.1 National Environmental Management Act, 1998 (Act No. 107 of 1998 as amended).
- 2.2 National Environment Management Biodiversity Act, 2004 (Act No.10 of 2004).
- 2.3 Natural Heritage Resources Act ,1999 (Act No.25 of 1999).

- 2.4 All relevant Provincial Regulations, Municipal by-laws and ordinances and the Gauteng Provincial 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.

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 indicates 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 1 km 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.

4. Listed activities applied for

The following listed activities have been applied for-

Activity No and description	Description of the development related to the listed activity
Listing Notice 3 Activity 12 The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.	-1.3ha of indigenous vegetation will be cleared. -The project area falls within an Ecological Support Area and Critical Biodiversity Area.

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 participation process and amendment of the application form should be considered for that additional activity.

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 1966 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 courses and several other outdoor sporting facilities.

The Terrestrial Ecology Impact Assessment noted that the project area contains numerous important floral and faunal species and is under threat from several alien invasive plants.

6. Impacts Identification, Assessment and Mitigation

The project area's biodiversity status is largely degraded and as such is assigned a sensitivity rating of 'very low' to 'medium'. The soil identified within the project area were found to have moderately low to moderate land capability. The portion of the property intended for development has largely been developed already.

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.

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 as such, the need for additional facilities has been identified.

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 ablation facilities at the Country Club Johannesburg, which are connected to the municipality sewage line.

9. Public Participation Process

The department notes that the draft report has been circulated to the public for comments. Placement of site notices within the project area in accordance with the requirements set in the EIA Regulations has been satisfactorily positioned. A newspaper advertisement was placed in the *Sandton Chronicles* 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.**

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 that do not emphasize enforcement be avoided.

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.

Yours faithfully,



Mr. Tjatja Mosia

Control Environmental Officer Grade B: Impact Management

Date: 30/6/2022