

**S24G RECTIFICATION PROCESS & BASIC ENVIRONMENTAL IMPACT  
ASSESSMENT FOR THE**

**Development of the Door of Hope Village Estate,  
De Deur, Midvaal Local Municipality, Gauteng.**



**Door of Hope**  
Children's Mission

**BACKGROUND INFORMATION DOCUMENT  
&  
INVITATION TO COMMENT AND REGISTER  
AS INTERESTED AND AFFECTED PARTY**

Return address for comments:

Coastal & Environmental Services  
Block C, The Estuaries,  
Oxbow Crescent, Century City,  
Cape Town, 7441.  
Tel: 021 045 0900  
Email: [m.johnson@cesnet.co.za](mailto:m.johnson@cesnet.co.za)



## AIM OF THIS DOCUMENT

The purpose of this document is to ensure that **people interested in or affected by the proposed project** are **provided with information about the proposal, the process being followed** and **provided with an opportunity to be involved** in the environmental assessment process.

Registering as an **Interested and/or Affected Party (I&AP)** allows individuals or groups the opportunity to **contribute ideas, issues, and concerns regarding the project**. I&APs also have an opportunity to **review all reports and submit comments** on those reports. All comments received are included in the reports submitted to the Competent Authority.

## THE PROPONENT

The Door of Hope organisation is a non-profit civil society organisation based in Glenvista, Johannesburg. The organisation has taken care of more than 1600 children since it was established in 1999. One of the ways they take in children is through the “baby box” - a hole in the wall where parents can leave their unwanted babies. Adoptions in South Africa are facilitated by government accredited adoption agencies. Door of Hope works in conjunction with such an adoption agency i.e. ABBA. They specialize in National Adoptions, Inter Country Adoptions, Unplanned Pregnancies and Social Services. ABBA provides a comprehensive spectrum of services related to adoption in all provinces in South Africa.

## THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

**COASTAL & ENVIRONMENTAL SERVICES (CES)** is specialised in environmental and social impact assessments and environmental management has been appointed by Door of Hope to conduct the required S24G Process and Basic Assessment for the proposed project. CES was established in 1990 has over 28 years of experience in the environmental sector and provide a wide variety of environmental advisory services to public and private-sector clients both within South Africa and internationally.

## PROJECT DESCRIPTION

The Door of Hope Children’s Mission is proposing to develop a private village estate for a possible 300 abandoned and orphaned children. The proposed site is on Portion 19 of the farm Hartsenberfontein 332 IQ, near De Deur, in the Midvaal Municipality, Gauteng. The proposed village estate will include 70 Housing Units (which includes a baby house), an early childhood development centre, a large dining hall, a school, sports and recreational facilities, storage facilities, medical clinic and therapy offices, maintenance workshops and storerooms, indoor and outdoor private gym, a library, administrative offices, green spaces, subsistence farming gardens, a multipurpose hall / church, four attenuation ponds, a sewerage treatment plant and internal access roads and parking areas. Electricity, water and sewerage lines will also be laid to support the new infrastructure. The total developed area will be less than 15 hectares.

In accordance with the environmental regulations, the proposed development is subject to a S24G Rectification Process and a Basic Assessment Process.

### **Section 24G Process**

In accordance with the regulations as outlined in Section 24G of NEMA, as amended, read with the S24G Fine Regulations, 2017, the applicant has commenced a listed activity, 12 GN R324 (Listing Notice 3) without appropriate authorisation and is thus in contravention of the National Environmental Management Act, 1998 (Act No. 107 of 1998).

The triggered activity resulted from the clearing of indigenous vegetation within a Critical Biodiversity Area and the construction of 3 Housing Units, a short dirt road and a 10 kl Sewerage Package Plant (See Figure 2).

### **Basic Assessment Process**

In accordance with the requirements the Environmental Impact Assessment (EIA) Regulations (2017), as amended in 2017, made in terms of Section 24 of the National Environmental Management Act (Act No 107 of 1998) as amended a Basic Assessment is being carried out by CES in respect of the above-mentioned project. Please note the Basic Assessment will assess the remainder of the development (i.e. all infrastructure that has not yet been constructed and is therefore not assessed in the S24G process).

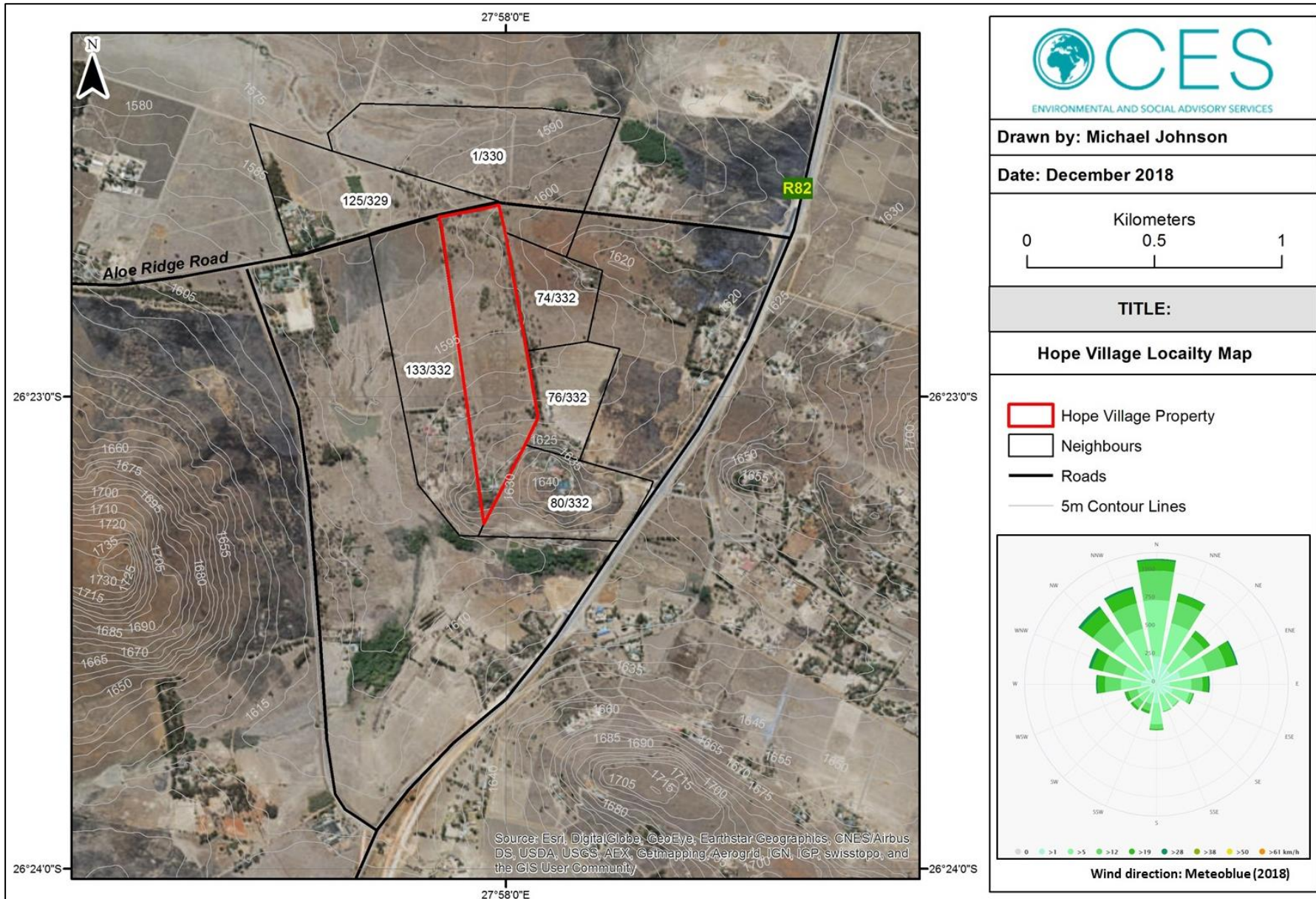
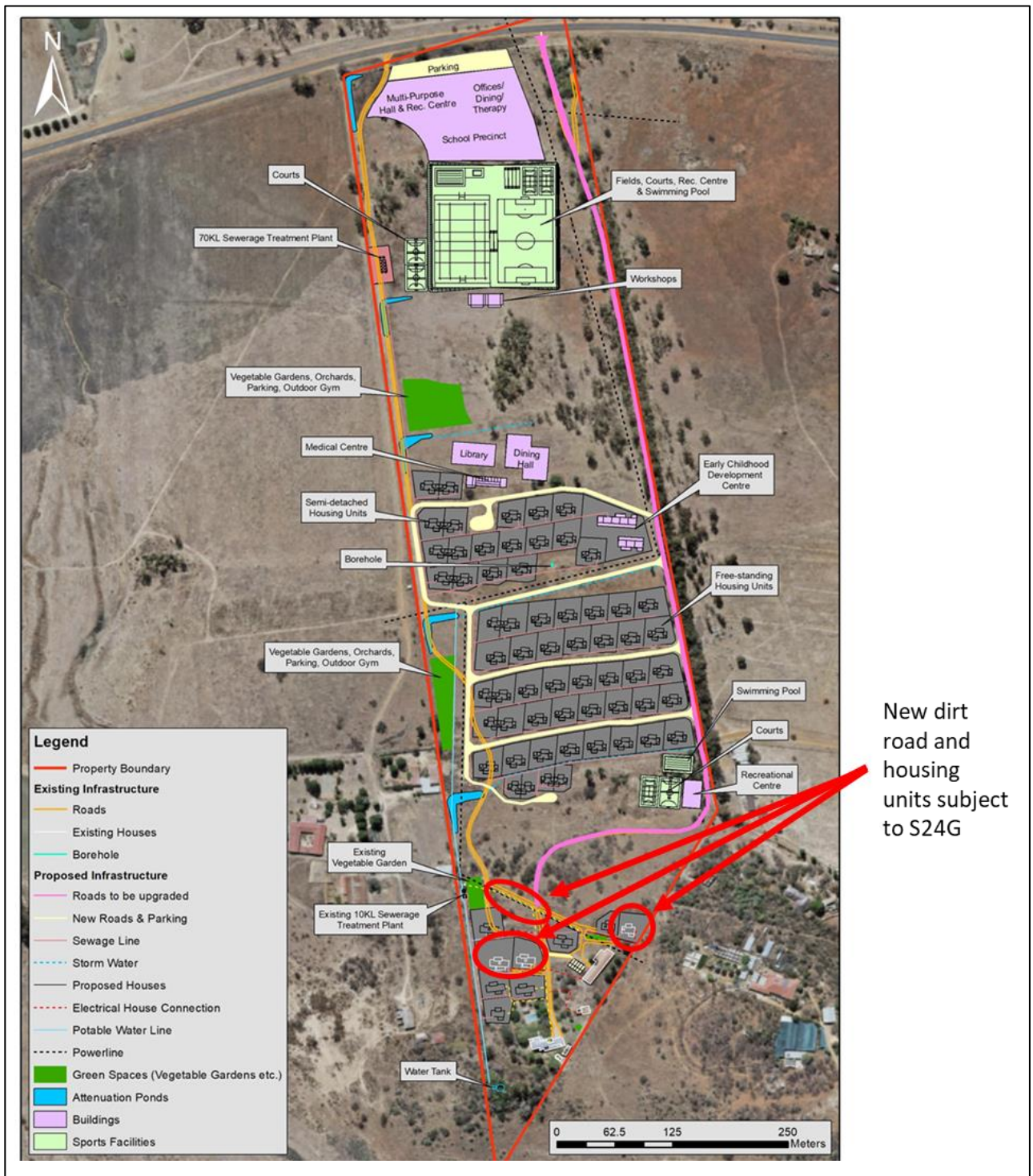


Figure 1. Locality Map of the proposed housing estate development.



**Figure 2. Proposed layout of the development. Red circles indicate newly constructed infrastructure that will be assessed in the S24G process. The remainder of the development will be assessed in the Basic Assessment.**

## RELEVANT LEGISLATION

In terms of Regulation 41 of the Environmental Impact Assessment (EIA) Regulations (2014), as amended in 2017, under Section 24(5) of the National Environmental Management Act 1998 (Act No 107 of 1998), various listed activities are provided for the determination of the magnitude of impacts, and consequently the environmental authorisation process to be followed. In this case the triggered activities under Listing Notices 1 and 3 require that a Basic Assessment be submitted for environmental authorisation to the Gauteng Department of Agriculture and Rural Development (GDARD) for environmental authorization.

The following activities are likely to be triggered by this development, according to the NEMA EIA regulations, 2014, as amended in April 2017.

<b>Detailed</b> description of listed activities associated with the project
Listed activity as described in GN R 327, 325 and 324
<b>Listing Notice 1</b>
<b><u>GN R. 327, Activity 12</u></b> The development of— (i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or (ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs— (a) within a watercourse; (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse.
<b><u>GN R. 327, Activity 13</u></b> The development of facilities or infrastructure for the off-stream storage of water, including dams and reservoirs, with a combined capacity of 50 000 cubic metres or more, unless such storage falls within the ambit of activity 16 in Listing Notice 2 of 2014.
<b><u>GN R. 327, Activity 24</u></b> The development of a road— (ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres.
<b><u>GN R. 327, Activity 27</u></b> The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation.
<b><u>GN R. 327, Activity 28</u></b> Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare;
<b><u>GN R. 327, Activity 30</u></b> Any process or activity identified in terms of section 53(1) of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004).
<b>Listing Notice 3</b>
<b><u>GN R. 324, Activity 2</u></b> The development of reservoirs, excluding dams, with a capacity of more than 250 cubic metres.  In Gauteng:  iv. Sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.
<b><u>GN R. 324, Activity 4</u></b> The development of a road wider than 4 metres with a reserve less than 13.5 metres.

<p>In Gauteng:</p> <p>iv. Sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.</p>
<p><b><u>GN R. 324, Activity 12</u></b></p> <p>The clearance of an area of 300 square metres or more of indigenous vegetation.</p> <p>In Gauteng:</p> <p>ii. Within Critical Biodiversity Areas or Ecological Support Areas identified in the Gauteng Conservation Plan or bioregional plans.</p>
<p><b><u>GN R. 324, Activity 14</u></b></p> <p>The development of—</p> <p>(ii) infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs—</p> <p>(a) within a watercourse;</p> <p>(c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse;</p> <p>In Gauteng:</p> <p>iv. Sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans.</p>
<p><b><u>GN R. 324, Activity 15</u></b></p> <p>The transformation of land bigger than 1000 square metres in size, to residential, retail, commercial, industrial or institutional use, where, such land was zoned open space, conservation or had an equivalent zoning, on or after 02 August 2010.</p> <p>In Gauteng:</p> <p>i. All areas.</p>
<p><b><u>GN R. 324, Activity 18.</u></b></p> <p>The widening of a road by more than 4 metres, or the lengthening of a road by more than 1 kilometre.</p> <p>In Gauteng:</p> <p>iv. Sites identified as Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) in the Gauteng Conservation Plan or in bioregional plans;</p>

In accordance with the regulations as outlined in Section 24G of NEMA, as amended, read with the S24G Fine Regulations, 2017, the applicant has commenced a listed activity, 12 GN R324 (Listing Notice 3) without appropriate authorisation and is thus in contravention of the National Environmental Management Act, 1998 (Act No. 107 of 1998). The triggered activity resulted from the clearing of indigenous vegetation within a Critical Biodiversity Area for the construction of 3 Housing Units, a short dirt road and a 10 kl Sewerage Package Plant. Therefore, in addition to the BA process the applicant is required to undertake an S24G rectification process for the infrastructure that has already been constructed.

# APPROACH TO THE BASIC ASSESSMENT AND S24G PROCESS FOR THE PROPOSED HOUSING DEVELOPMENT

## Basic Assessment Process

The BA for the proposed project is presently in the planning phase. This phase serves primarily to inform the public and relevant authorities about the proposed project and to determine any impacts. These impacts will then be extensively addressed during the environmental impact assessment studies. Only after the final Basic Assessment Report has been submitted will the relevant authorities make a decision.

A Draft Basic Assessment Report (dBAR) will be compiled which will comprehensively describe the activities and impacts that the project may have on the receiving environment, and details from the PPP process. The dBAR and Environmental Management Programme (EMPr) will be submitted for a 30 day public comment period.

Subsequent to the review and commenting period, a Final BAR will be compiled for submission to GDARD. This will include all public comments and response to issues raised by Interested and Affected Parties (I&APs).

Should the authorities grant approval via an environmental authorisation, all registered I&APs will be notified accordingly and given the opportunity to appeal against the decision, should they so wish.

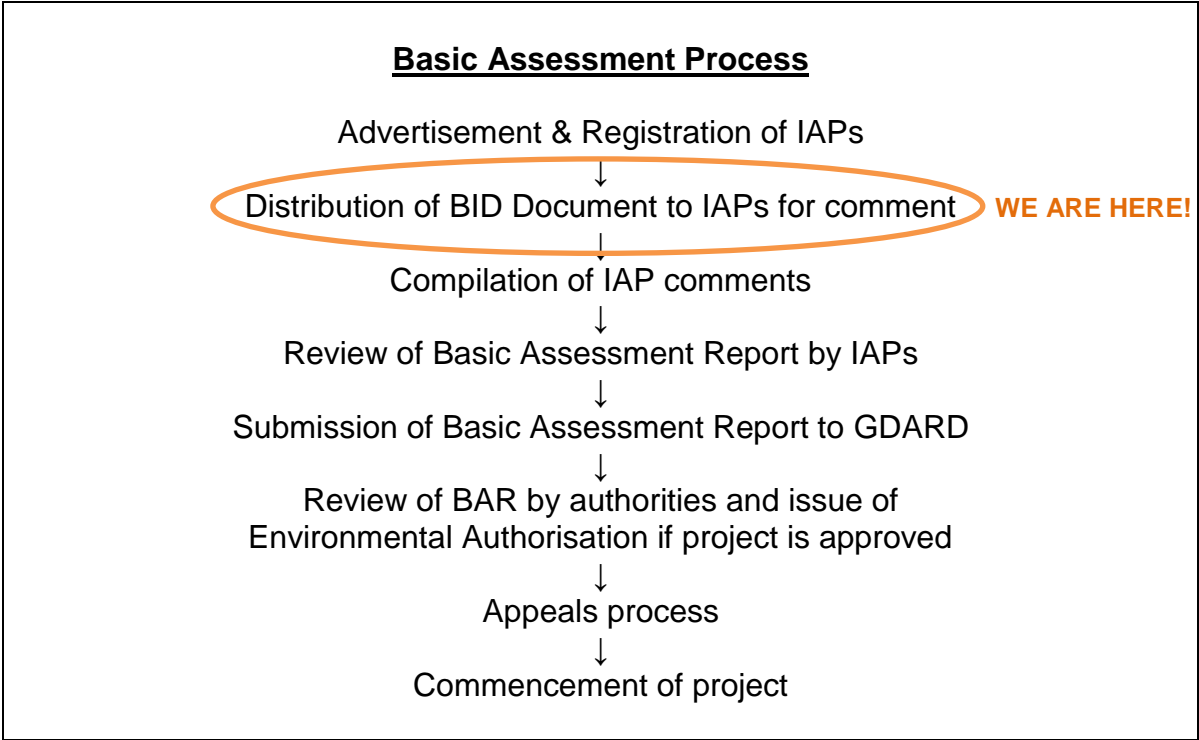


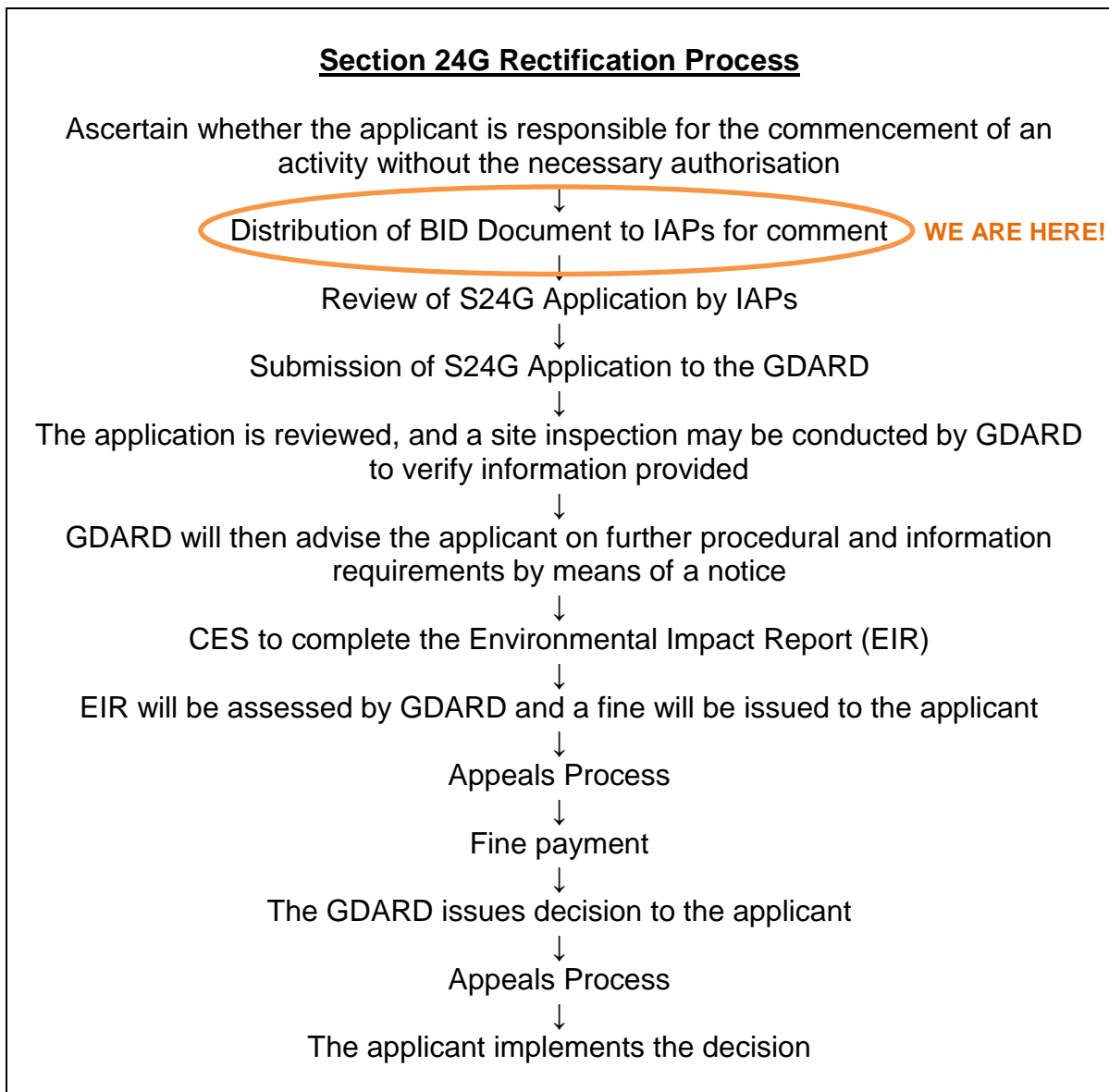
FIGURE 2. Proposed Basic Assessment Process Including Public Participation.



## Section 24G Rectification Process

The process of dealing with S24G applications is outlined in S24G of NEMA, as amended, and the S24G Fine Regulations, 2017.

Please see below the S24G process (summarised for better understanding):



## POTENTIAL IMPACTS AND BENEFITS

The following general impacts are anticipated for housing development projects such as this:

- Waste creation and storage
- Soil erosion
- Water contamination
- Dust generation
- Noise
- Vegetation and fauna impacts
- Loss of soil fertility
- Invasive alien species spread
- Social benefits
- Heritage impacts

The following specialist studies will be conducted to ascertain any potential impacts, positive and negative, that may occur as a result of the potential authorization of the project, and to propose mitigation measures for the construction and operation phases:

- Wetland and Aquatic Impact Assessment
- Ecology Impact Assessment
- Heritage Impact Assessment
- Palaeontological Desktop Study

## HOW CAN YOU BE INVOLVED?

A Public Participation Process (PPP) is being conducted as part of the S24G and Basic Assessment. The aim of the PPP is to allow everyone who is interested in, or likely to be affected by, the proposed development to provide input into the process.

The Public Participation Process will include:

- Advertisements in the local newspapers;
- Notice Boards on site;
- Circulation of the BID (this document) to all I&APs and stakeholders;
- Registration of all I&APs and stakeholders; and
- Review of all comments by registered I&APs and stakeholders.

If you consider yourself an interested and/or affected person/party, **it is important that you become and remain involved in the public participation process.** In order to do so please follow the steps below in order to ensure that you are continually informed of the project developments and will ensure your opportunity to raise issues and concerns pertaining to the project.

**STEP 1:** Please **register** by responding to our notification and invitation, with your name and contact details (details provided on cover page and below). As a registered I&AP you will be informed of all meetings, report reviews and project developments throughout the S24G and BA processes.

**STEP 2:** Please send us any comments, concerns or queries you may have in relation to the proposed project.

**STEP 3:** Attend meetings that may be held throughout the S24G and BA processes. As a registered I&AP, you will be invited to these meetings.

CES is required to engage with all private and public parties that may be interested and/or affected by the proposed project, in order to distribute information for review and comment in a transparent manner.

In the same light, it is important for I&APs to note the following:

1. In order for CES to continue engaging with you, please **ENSURE** that you register on our database by contacting the person below.
2. As the BA and S24G processes are both regulated by specific review and comment timeframes, it is your responsibility to submit your comments within these timeframes.

**I hereby wish to register as an Interested and Affected Party (I&AP) for the Door of Hope Village estate development**

Name:

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Organization:

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Postal address:

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Email:

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Mobile #: \_\_\_\_\_ Fax #: \_\_\_\_\_

Landline #: \_\_\_\_\_

My initial comments, issues or concerns are:

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Other individuals, stakeholders, organisations or entities that should be registered are:

Name:

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Organization:

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Postal address:

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Email:

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Phone #: \_\_\_\_\_ Fax #: \_\_\_\_\_

Landline #: \_\_\_\_\_

Please return details to: Michael Johnson: Block C, The Estuaries, Oxbow Crescent,  
Century City, Cape Town, 7441.

Tel: (021) 045 0900 | Fax: (046) 622 6564 | Email: [m.johnson@cesnet.co.za](mailto:m.johnson@cesnet.co.za)