

WFA CHRISTIAAN BUSINESS SCHOOL - GERARDSVILLE COMMENTS AND RESPONSES REPORT September 2019

Issue	Commentator	Date	Response
Services and infrastructure			
 Transnet pipelines, a division of Transnet SOC Limited, is not affected by the proposal as indicated on the Gerardsville/Pretoria Locality and Site/Project Layout Plans 	T. Hadebe (Transnet Pipelines)	01 February 2019	None required.
Sasol Gas is not affected.	S. Reyneke Sasol Gas	30 January 2019	None required.
The following Eskom comment was received on	the Town Planning	Application	
 The following Eskom distribution services are affected: LAEZONIA/GEM 11Kv Feeder Conductor. 	M.P Maluleke	25 February 2019	Note is taken of the Eskom comments and conditions. The conditions will be adhered to.
 The approximate position of these services is indicated as per the drawing below. The exact position of these services cannot be guaranteed. 			

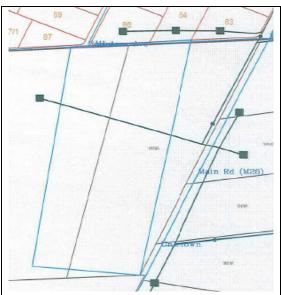


Figure 1: Eskom affected services

- Eskom will raise no objection to this application provided its rights and services are acknowledged and respected at all times, and the requirements as laid down by the Occupational Health and Safety Act No 85/1993, are complied with. As additional safety measures Eskom require that the following conditions are complied with:
- No construction may commence before the following conditions have been adhered to. All requirements as laid down by the Occupational Health and Safety Act No 85/1993 also have to be complied with:
- The applicant or his contractor must notify Hennops Technical Service Centre at 12 725 2104/392, contact person Dumisani 082 336 8147 at least seven days prior to the commencement of any work whatsoever, under or in

	alana provimity to Fakom parvisos	
	close proximity to Eskom services.	
•	Under no circumstances will any	
	relocation work proceed prior to the	
	submission of a formal application to	
	Eskom Customer Services at least three	
	months prior to the commencement of	
	any work, and acceptance of the	
	relocation costs by the applicant.	
•	Any cost and claims due to interruptions	
	or interference to Eskom services	
	causing power supply loss or loss of	
	income, due to this application, will be	
	borne by the applicant.	
•	Eskom must have ingress to egress	
	from its services at all times.	
•	No mechanical equipment, including	
	mechanical excavators may be used	
	under or in close proximity to Eskom	
	services without prior approval of Eskom	
	authorized representatives.	
•	The consent is further subject to the	
	Landowner's permission for the	
	proposed works as per this application.	
	A copy of the permission must be filed	
	with Eskom seven days before any work	
	is carried out in the servitude area.	
•	Eskom shall not be liable for the death	

of or injury to any person or for the loss of or damage to any property caused in whatsoever manner by the applicant, his employees, agents or contractors. The applicant indemnifies Eskom against all

consequential damages by third parties which includes but is not limited to claims as a result of damage to, or interruption of or interference with Eskom services or equipment. The applicant's attention is drawn to section

claims

including

27(3) of the Electricity Act 1987.

claims

- No excavations may be executed closer than six metres from overhead lines and 1.5 metres from underground cables, unless Eskom authorized representatives is on site.
- No blasting may be undertaken under or in close proximity of Eskom services unless minimum charges with adequate matting is used, and then only under the strict supervision of Eskom authorized representatives who require at least three days prior notification.
- Should the applicant or his contractor damage any of Eskom services during the commencement of any work whatsoever, call Eskom 24 hour fault number 011 800 4441 and it must be dialed immediately to report the incident.
- The contractor in charge of the construction or maintenance work on site must at all times be in possession of the letter of approval of the service concerned, as well as all plans that are required and that are referred to in the correspondence, so that during an inspection the contractor can present the documentation to Eskom official(s) when requested to do so. If no approval can be presented then the Eskom official(s) can order the contractor to cease all works until such approval can be presented.
- Statutory ground/structure to clearances is to be maintained at all times. If Eskom has to incur any costs to comply with statutory requirements because of the development activities or the presence of equipment or plant in the servitude area, Eskom will be refunded such proven costs on demand.

 Should any construction of any services e.g. roads close to Eskom services be necessary in future, the application will have to made to Eskom. The individual Title Deeds of those Erven affected by Notarial Deed Servitude in favour of Eskom must be made subject to the Notarial Deed of Servitude. 			
Clauses to be included in Conditions of Establishment for Township applications where Eskom is the supplier of electricity:			
A 3x6m space will be reserved as Private Open Space for Eskom mini substation;			
 No large rooted trees shall be planted on the pavement the to endanger any electrical cables; 			
 No large rooted trees shall be planted on the pavement to endanger any electrical cables; 			
 No tree shall be planted closer that three meters to any overhead power line on pavements; 			
The supplier of electricity will have the right to remove/trim any trees or brush on pavements that endanger any power line.			
On the whole he would support the application given that suitable waste water and sewerage solutions implemented do not negatively impact on either local fauna and flora or the general ambience of the adjoining properties		30 January 2019	Noted. See above discussion regarding sanitation
Registration as an Interested and Affected Party.Requested that relevant documents be	L. Pattison	05 February 2019	 Registered as an I&AP The Draft Basic Assessment was made available to her for review and comment. The Final BAR will also be made available to her for review and comment

provided to her as they become available.								
Water								
 Owner of 2 properties: Plot 89, just off corner of Second Avenue and Mimosa Avenue and plot 87/3, corner Mimosa and second avenue Gerardsville. Both 	N. du Plessis	23 February 2019	The services report provided the following information regarding water: Demand: The water demand is based on the current COT standards: Table 1: Water demand					
properties will be affected by water issues after construction.				Size (m2)	Number of pupils/rooms	Unit demand	Total demand kl/day	
			School	10 000	2 000	0.6kl/pupil	120kĺ	
			Hostel	20 000		0.9kl/100m2	180kl	
			Sporting grounds	55 000	-	Nil	Nil	
			No demand is calculated and applied for irrigation of sport grounds. With the outflow from the hostels, grey water harvesting will be implemented, stored and if required supplemented from existing boreholes and rainwater harvesting on the property. However, compulsory residency will generate significant effluent from the grey water system to be used for irrigation.					
			Knopjeslaag	pment falls w	one. Being part			n future fall under e is sufficient water
			negotiated v	with the City of mis installed t	Tshwane. The d	eveloper is con nt water for irri	nmitted to ensugation of sport	rtaken once finally ure a sufficient grey grounds and open
Her particular concern is provision of water.	L. Pattison	05 February 2019	/day. The h	nostel will requ	uire 180kl/day. Tl	ne sports grou	nds will be irr	ol will require 120kl igated by the grey eated to the highest
			The site fa	lls in the Mna	andi reservoir zo	ne and will in	future fall ur	nder Knopjeslaagte

			reservoir zone. The engineers have determined that there is sufficient piped water to serve the development. Upgrades of the bulk water system have been proposed and is to be undertaken by the developer. A minimum 160mm dia connection to the existing network is at Mimosa Avenue and Tweede Avenue is proposed. No abstraction from groundwater resources is planned. Irrigation will be from treated effluent and storm water retention. Supplement of that will be from municipal supply, but with the Hostel generating large amounts of effluent this will be more than sufficient, even in dry periods.
Sanitation			
	L. Pattison	05 February 2019	Sanitation There is no existing sewer infrastructure in the vicinity and the nearest is Copperleaf Golf Estate serviced by a Private Treatment Works and therefore the development is to be serviced with a private treatment works/package plant. There are various examples of such solutions that have been approved in absence of a municipal service. A Bio Sewage treatment Plant is proposed for the following advantages: Green Recycles black and grey water: Allows greatly reduced consumption of municipal water. Environmentally friendly - No sewage contamination of the environment, underground water or open water sources. No chemicals used at all in the process. Very small footprint. Economical Very cost effective. Very quick to install with minimal civil works. Simple and 100% natural process. Very light on electrical consumption. Can be run off solar power. Fully designed and manufactured in South Africa. Socio-Economic Benefits Human dignity.
			 Better Sanitation for WASH program, especially in areas that have no water borne sewage systems. Job creation through micro-contractors. Can be used in both rural and densely populated areas.

Low maintenance

- No sludge handling required.
- Unskilled monitoring of plant.
- · No chemicals or additives.
- Replacement of any failed pumps simple and economical.

Water usage

- Low fresh water consumption.
- Processed water can be re-used for toilet flushing
- Processed water can be used for irrigation or gardens, lawns and crops.
- One litre of sewage produces one litre of processed water.

The treatment plant is to be located in the lowest portion of the property as it can be seen below.

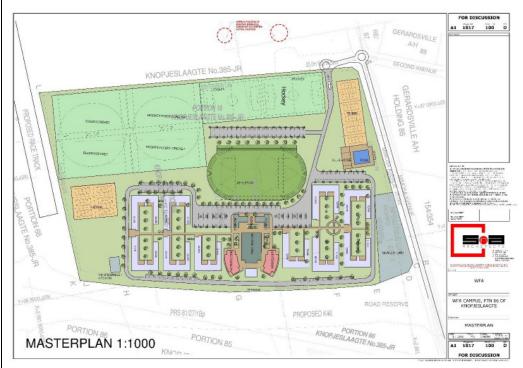


Figure 2: Site Development Plan

Backup generators position on site

The treatment plant will not make use of generators, should a need arise the applicant will make use of necessary measures to ensure that noise is appropriately mitigated.

			Pollution /system failure prevention mitigation measures proposed 48 hour emergency storage, with 24 hour reaction time of system operator. This is backed up by an operational agreement with the owner. Daily maintenance or checklist Daily – check, ensure power is on, ensure diesel back up, included in service contract. Weekly – With Ozone, no requirement, basic review for leaks and operational, water is clean and odourless Monthly – open valve (3s) on Bio tanks, to ensure no sludge build up Annually – General Service of pumps, General Service Ozone unit Pre Digestion chambers – Sediment grit removal
Public Participation			
 Registration as an I&AP Requested information regarding the application. 	A van Staden	29 January 2019	 Registered as an I&AP Information provided as per request. The Draft Basic Assessment was made available for review and comment. The Final BAR will also be made available for review and comment
 Registration as an I&AP He lives in Gerardsville and will be affected to a degree by the school. He will provide comments in due course after studying all the info. 	B. Glossop	25 January 2019	 Registered as an I&AP The Final Basic Assessment report will be provided to all I&AP's for input.
 Registration as an I&AP Their interest in the matter is because they are property owners in Gerardsville and the impact this will have in the area. 	C & K da Silveira	29 January 2019	 Registered as an I&AP The impact on the immediate environment and the residents of Gerardsville was discussed in the Final Basic Assessment report which will be provided to all I&AP's for input. Mitigation measures have also been proposed to mitigate impacts/issues.
Registration as an I&AP and requested additional information as available.	E. Haas S. Botha	28 January 2019	 Registered as an I&AP The Draft Basic Assessment was made available for review and comment. The Final BAR will also be made available for review and comment
Registration as an I&AP	G. Watkins	28 January 2019	Registered as an I&AP
Registration as an I&AP	D.E Williams	05 February 2019	Registered as an I&AP
Registration as an I&AP.Requested a plan of the school	P. Millinger	05 February	Registered as an I&APSite development provided.

•	Would like to know the target market for the school		2019	•	The target market will be the parents that want a school with boarding facilities for their children. In the modern world, most parents have hectic working schedules that require them to move around the country and even outside of the country. In order for them to juggle work and parenting they require schools that will have quality boarding facilities either for a weekly or monthly basis.
•	Registration as an I&AP	N. Patel	27 February 2019	•	Registered as an I&AP
•	Registration as an I&AP	N. Forster	31 January 2019	•	Registered as an I&AP
•	Welcomes the proposed development The interest in the project is the fact that they are locals and have a construction company, which they believe will add value to the project by participating in the building of the school, whether as sub-contractors or so.	J. Maseko	29 January 2019	•	Noted The developer will have a tendering process which is outside the range of influence of the EIA team. It is believed that the tendering process will be advertised accordingly and all tendering process will be directed to the developer, directly.
•	Requested information regarding the proposed development	M. Moss	28 January 2019	•	The Draft Basic Assessment was made available for review and comment. The Final BAR will also be made available for review and comment
•	Registration as an I&AP	T. Klassen	29 January 2019	•	Registered as an I&AP
•	Requested a Background Information Document. Registration as an I&AP	S. Botha	30 January 2019	•	Background Information Document provided. Registered as an I&AP
•	Registration as an I&AP	B. Cooper (Magaliesberg Biosphere)	05 February 2016	•	Registered as an I&AP
•	Registration as an I&AP He is interested in the project as he lives in Gerardsville, approximately 300m from the proposed entrance to the school. He has been in Gerardsville for 16 years and this is the most exciting development ever proposed. They are overjoyed about this development and feel very strongly that it is the kind of development that will serve Gerardsville well and elevate their	C. Rossouw	25 February 2019	•	Registered as an I&AP. Comment noted

community, adding great value while			
 Registration as an I&AP. He supports this project with his whole being. Will the concerns of tenants in the area be addressed? Him as the land owner should rather be accommodated in his concerns than that of a tenant that can pack up and move away at the drop of a hat. 	Stefan	02 February 2019	Registered as an I&AP. Comment is noted. It should be understood that the Public Participation Process is undertaken in terms the EIA Regulations in the Government Notice R982 2014 (as amended 2017). The regulations state the following: "The Public Participation Process contemplated in this regulation must provide access to all information that reasonably has or may have the potential to influence any decision with regard to an application unless access to that information is protected by law and must include consultation with — a) The competent authority; b) Every state department that administers a law relating to a matter affecting the environment relevant to an application for an environmental authorisation; c) All organs of state which have jurisdiction in respect of the activity to which the application relates; and d) All potential, or, where relevant, registered interested and affected parties. Potential or registered interested and affected parties including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application and must be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority".
Location and Project Proposal			
He is a resident/owner of a portion of Gerardsville AH and he would like to be kept informed about where the proposed site is exactly situated and what facilities will be on site. He fully supports the school otherwise.	S. Hand	25 January 2019	Location of site The proposed development is situated on Part of Portion 16 and part of Portion 66 of the farm Knopjeslaagte 385 JR. The site is bounded by Mimosa Ave/Gerarsdsville A.H to the north. K46 to the east Remainder of Portion 66 of the farm Knopjeslaagte 385 JR to the south and Remainder of Portion 16 of the farm Knopjeslaagte 385 JR Project Proposal (Facilities proposed on site) Please refer to the site development plan below for the facilities proposed on site.



Figure 3: Site Development Plan

The school model is based on a compulsory hostel residence to accommodate 2000 pupils. The number of rooms provided are therefore the same as the number of pupils.

The proposed school is to provide an educational facility to a target market of people; these are parents that require a school with a boarding facility. There are a number of schools in the Gauteng province but very few that offer boarding facilities because of the challenges that are associated with the running of such a facility.

The school is to be developed in 3 phases. In phase 1 600 are to be enrolled, Phase 2 will host 600 pupils and Phase 3 will accommodate 800 students.

Access and Traffic

What access will be provided and what

will be the impact on traffic.

January 2019

Access to the development will be from Mimosa Avenue at the intersection of Tweede Avenue. A new circle will be constructed and a link road will be provided to the developments access, approximately 100m from the Mimosa/Tweede Avenue intersection.

A Traffic impact study was conducted and it concluded that the proposed development may

Access/Traffic

25

S. Hand

			generate 1600 trips during the weekday AM peak hours. Road upgrades have been proposed at the problematic junctions to mitigate the effect of the anticipated traffic to be generated by the proposed development. Please refer to Appendix G for the Traffic impact study.
 Access via mimosa would be impractical given it is effectively a single lane road. Any congestion would back up onto the m26 creating a major safety issue not to mention irritation to locals coming and going during peak traffic times. 	M. Smith	30 January 2019	See above discussion for traffic concerns.
Her particular concerns are provision of, and traffic impacts.	L. Pattison	05 February 2019	See above discussion for traffic concerns.
Owner of 2 properties: Plot 89, just off corner of Second Avenue and Mimosa Avenue and plot 87/3, corner Mimosa and second avenue Gerardsville. Both properties will be affected by construction traffic.		23 February 2019	The proposed development might have a traffic impact during the construction phase. This impact will be of low significance and will be short lived. The impact will be mitigated by the Environmental Management Programme which will be implemented during the construction phase.
 Huge spike in traffic and the noise involved as well. Invitation of public transport to take shortcuts through their area and to come to the school. 	A van Eeden	30 January 2019	 Please see above for traffic concerns. <u>Traffic</u> According to the Traffic Impact Study buses and taxis do not operate along Mimosa Avenue. However bus stops are provided along the existing Mimosa Avenue / M26. There are no existing public transport facilities located within the vicinity of the study area. Pupils attending the school via public transport will be allowed to be dropped off and picked up at designated public transport lay-by within the school. It cannot be guaranteed that rat running will not take place through Gerardsville, but the roads will be upgraded with signals to ensure improved traffic flow along the main road resulting in route of choice, rather than the agricultural roads through Gerardsville. It is understood that there will be an increase in noise due to an increase in traffic however, the road adjacent to the site is at low speed, so it will be mostly be engine noise. This can be mitigated by introducing speed reducing measures (speed humps, circles, etc).
Security			
Security concerns as this will also apparently consist of a boarding house onsite.	S. Hand	25 January 2019	Security The site is to be enclosed with a diamond mesh fence, with razor wire and 40% shade netting if permanent walling/fence is not yet built at the onset.

·	Owner of 2 properties: Plot 89, just off corner of Second Avenue and Mimosa Avenue and plot 87/3, corner Mimosa and second avenue Gerardsville. Both properties will be affected by security issues after construction.	N. du Plessis	23 February 2019	See above response.
0.			T	
•	Spiked increase in crime from builders.	A. van Eeden	30 January 2019	Crime. Security during the construction phase – Only standard labourers will have access to the site, controlled at the gate. Security guards at night, with minimum 2 night watchmen over plant and material. No labour to be accommodated. Fencing to be maintained during the construction as prescriptive item in the BOQ (Bill of Quantities). Security during the operational phase - The project team will enclose the site with a diamond mesh fence, with razor wire and 40% shade netting if permanent walling/fence is
				not yet built at the onset.
Ec	cological impacts			
•	Destruction of the natural environment on which wildlife including the endangered Giant African Bullfrog exist.	A. van Eeden	30 January 2019	Ecological Impacts A Biodiversity Assessment was undertaken by Flori Scientific Services for the site. The site is predominantly that of an intertwined mix of open, degraded grassland and old cultivated lands, some of which are presently mowed on a regular basis for cattle feeder. The only habitat present can therefore be described as degraded grassland as it cannot be separated out from the old cultivated lands. The site is not situated within or close to any demarcated Gauteng ridges and there are no watercourses on the site and the site is not affected by flood lines. There are however two Orange plant species occurring on site that can be easily lifted and transplanted elsewhere. During field investigations no faunal species on conservation concern were encountered. The mound present in the northern section of the site is not sensitive and can be leveled if required. The study thus concluded that there are no high sensitive areas or No-Go zones identified on site during the field investigations.
Vis	sual Impact			
•	Destruction of their country view.	A. van Eeden	30 January 2019	Impact on view. One of the potential impacts of a development is its aesthetic impact. The aesthetic quality of an area is important for several reasons and could be an important contributor to the wellbeing and quality of life for people (Barnard, 1999). A new development should therefore aim to be attractive and visually pleasing. It should preferably improve the visual quality of the area and at the very least should avid visual degradation of the area (Barnard, 1999). The proposed development of the school will incorporate sport facilities along Mimosa Avenue (please see below) It is understood that these sporting facilities will be

			landscaped and properly maintained throughout the lifecycle of the school. In addition to the abovementioned, it is uncertain as to what extent the development of the site will affect crime levels of the area or how crime experienced in the area would affect the developed site and its inhabitants. However, according to the CSIR in its report Designing Safer Places – A Manual for Crime Prevention through Planning and Design 2001, the site could in its current vacant form be considered as an area of refuge where people can hide and have clear routes of escaping from a crime. For example, houses or neighbourhoods near or adjacent to tracts of open land are often the targets of repeated burglaries. Car hijackings are often planned to allow quick escape. Therefore, a planned development such as this school could have a positive impact in terms of crime solutions in the area.
Sense of Place			
 She is a resident in Gerardsville and lives opposite the area where this assessment and school is to take place and she wants it known that she, her family and neighbours are STRONGLY OPPOSED to the assessment and development of the school! They are extremely upset and angry to see this notice and they object to it taking place. They are lodging this as a STRONG FORMAL COMPLAINT based on the following: Disturbance of the peace. Loss of their country activities such as nature walks, horse-riding, cycling etc. 	A. van Eeden	30 January 2019	 Disturbance of the peace. A typical day at the school is described below in order to estimate the extent of impact to the sense of place/disturbance to peace. Typical day at the school: Full boarding. No scholar will be allowed to leave the premises. Five teachers per grade will be live in "parents". The only traffic to and from the school daily will not exceed fifteen vehicles. Weekends All scholars will need to report back to school between six and seven on a Sunday evening. Therefor no scholar traffic on a Monday morning. On Fridays lectures will start at 6am. It will allow scholars to leave for the week end over an extended time during the afternoon. Grade 8 and 9 will leave between 12 and 1, grade 10 and 11 between 1 and 2, the rest between 2 and three. The arrangement will ease the flow of traffic to a large extent. School Bell To report to classrooms: it will be expected of scholars to watch the time themselves. They will not be notified or then warned in any way. Should they arrive late their investment account will be debited with a penalty amount. Because the school will apply a fully integrated computer, television network whereby lectures are broadcasted, the end of such a lecture will imply the end of that class. The start of the next one will managed by way of a time table. By implication the beginning and the end of lectures will be manage similar to that of a university. No bells
Dawie van Eeden, with cell number 0712900688 lives in Gerardsville right next to where the proposed school might be. The new development will have a huge impact on every one living there as well as wildlife. They have jackal, porcupine,	D. van Eeden	26 February 2019	Ecology See discussion above Crime See discussion above

	owls, duiker and Bullfrogs in the area. If the development would be approved all these wildlife would be lost. Crime will also pick up a lot as it always does with new projects, Gerardsville is rated one of the safest places in Gauteng to live and this will definitely				ange of Character of area e impact on view discussion above
	change with development. Is against the proposed development.				
Noi	se				
•	Owner of 2 properties: Plot 89, just off corner of 2cnd and Mimosa Avenue and plot 87/3, corner Mimosa and second avenue Gerardsville. Both properties will be affected by construction noise.	N. du Plessis	23 February 2019	•	The proposed development will have a noise impact during the construction phase caused by construction personnel, vehicles, machinery used on site etc. This impact will be of low significance and will be short lived. The impact will be mitigated by the Environmental Management Programme which will be implemented during the construction phase.
•	Bad noise from vegetation removers, levelers, cutters, builders etc.	A. van Eeden	30 January 2019		construction phase.
Dus	et				
•	Owner of 2 properties: Plot 89, just off corner of Second Avenue and Mimosa Avenue and plot 87/3, corner Mimosa and second avenue Gerardsville. Both properties will be affected by construction dust.	N. du Plessis	23 February 2019	•	<u>Dust during construction</u> The proposed development will have a dust impact during the construction phase. This impact will be of low significance and will be short lived. The impact will be mitigated by the Environmental Management Programme which will be implemented during the construction phase.
•	Pollution from building vehicles and dust followed by traffic, directly to their house which will affect their health including that of her toddler child.		30 January 2019		
Coi	mments on the Draft Basic Assessment Repo	ort			
•	She was thankful for the very well-written report and supporting documents and she had no comments.		17 July 2019	•	None required.
•	He had not received any further correspondence regarding the project	D. Williams	17 July 2019	•	Duncan Williams was telephonically contacted and provided with the necessary information. Please refer to Appendix I for the proof of email.
•	Would there be a smell of sewage emanating from the proposed Sewage Treatment Plant that might bother Gerardsville residents? How would any such odours be controlled? Could the water consumption of the	Bob & Maxi on behalf of Gerardsville Domiciled Homeowners	10 July 2019	•	The Bio-Sewage Systems General Manager confirmed that no odour would emanate from the package plant. Furthermore a site visit was conducted on 03 September 2019 at a school that makes use of the Bio sewage system which confirmed the General Manager's response. The I&AP was present at the site visit. Please refer to Appendix E, Appendix 11, for the attendance register.

school	affect	the	wa	ter	supply	to	
Gerards	ville in	any	way	(e.g	g. reduct	tion	
in pressure?)							

- Please can it be ensured that noise reduction containers are used for the backup generators.
- It is important that the Eskom requirements be followed, so as not to affect the integrity of the electricity supply to Geradsville residents.
- There is natural spring, situated on the proposed site, which sometimes surfaces during rainy periods and runs down to Mimosa Ave: would this spring, and the underground water table, be affected in any way by the proposed development and could nearby existing boreholes be affected?

Association

 According to the Services Report the proposed development falls within the Mnandi Reservoir zone and will in future fall under Knopjeslaagte reservoir zone. Being part of the Vaal River basin there is sufficient watercourse for the development.

Therefore the development is serviceable and network upgrades as recommended by GLS Consulting will be undertaken once finally negotiated with the City of Tshwane. This includes the identified bulk water upgrades which are already being implemented by the City of Tshwane, i.e. Rand Water connection (As confirmed by Mr. Odwa Badi).

Furthermore, the developer is committed to ensure a sufficient grey water system is installed to provide sufficient water or irrigation of sport grounds and open areas. A separate network will be provided for this purpose.

- According to the Bio-Sewage Systems General Manager there will be very limited noise
 from the package plan and the package plant will not make use of generators.
 Furthermore the plant machinery will be housed thus mitigating the minimal amount of
 noise that would occur. The site visit undertaken as mentioned above also confirmed
 the minimal amount of noise.
- The Eskom comments will be adhered to. It is understood that an amicable solution can be reached between the Applicant and Eskom.
- According to the Biodiversity Assessment there are no watercourses in the study area including rivers, streams, distinctive drainage lines, wetlands or freshwater pans (which is a type of wetland). The closest major watercourse is the Hennops River and the Swartbooispruit stream. There are a few small wetland areas situated mainly along the course of the Swartbooispruit, but there are none within the study area, or any within a 500m radius of the outer boundaries of the study area.

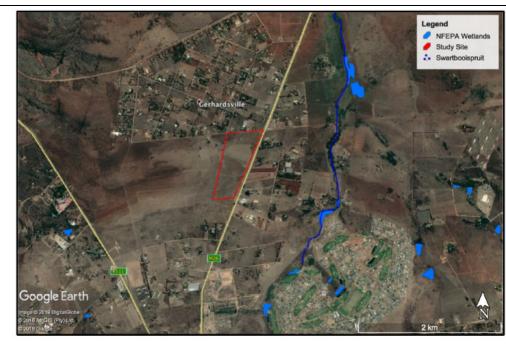


Figure 4: NFEPA wetlands in the area

Project Summary

- The development entails the establishment of a school that is to accommodate approximately 2000 learners and will consist of learning and boarding facilities.
- The school will be serviced with a private sewerage treatment works/package plant and grey water harvesting will be implemented for irrigation purposes.
- The proposed development is listed under Activity 27 of Listing Notice 1 and Activity 12 (c) (i) (ii) of Listing Notice 3 of the Environmental Impact Assessment Regulations, 214 as amended.
- The proposed site covers an area of 18.8344 hectares in extent.

Findings of Departmental GIS

 The proposed site falls within an Ecological Support Area, Important Area K. Khaka 22
Gauteng 201
Department of
Agriculture and
Rural
Development

22 July 2019

Project Summary

• No response required.

Findings of Departmental GIS

 The state of vegetation was discussed in detail in the Specialist report and it was mentioned that there is no pristine vegetation present. The presence of the rare, red data species of *Cucumis humifructus* is highly disputed. The plant has a threat status of vulnerable (VU) and requires deep soils and is entirely dependent on aardvark for its dispersal and germination cycles.

According to the red list of South African plants (which can be found online at (www.redlist.sanbi.org) the plant is very range restricted and found mostly in the south of Limpopo near Gauteng and North West. According to the information available the plant was historically present in Gauteng, but it is presumed to be extinct in the province and historical locations cannot be located. It is extremely unlikely that the species is present on site.

The Endangered Wildlife Trust (EWT) was consulted in order to provide further information about the presence of grass owls on site. According to EWT there are grass

and an Irreplaceable Area, with primary vegetation Gauteng Grassland present on parts of the site and the northern part of the site is underlain by dolomite according to the Departmental GIS and Gauteng Conservation Plan Version 3.3. Furthermore, the Departmental GIS reveals the presence of red listed plant species *Cucumis Humifructus* on parts of the site and red listed bird (African Grass Owl) habitat on the southern part.

• According to the Gauteng Environmental Management Framework of 2015, the proposed site is classified as being with Environmental Management Zone 4, which is dominated by agricultural uses outside the urban development zone where agricultural rural development is supported. A secondary part of the site is located within Environmental Management Zone 3, which is a high control zone with limited development and only activities related to tourism, and conservation encouraged.

Comments on the content of the report

- The alternatives included in the DBAR are noted by the Department, however, the final BAR should cover all relevant and feasible alternatives including the No-Go alternative for the proposed activity.
- site specific Environmental Α Management Programme (EMPr) is included in the DBAR. The EMPR must however comply with the content requirements as stipulated in Appendix 4 of the Environmental Impact Assessment (EIA) Regulations, 2014. The EMPr will need to address behavior to preserve the untransformed areas of the site and other sensitivities and thus contribute to the principles sustainable development. The state of the primary vegetation need to be assessed, hence aspects such as the

owls in the <u>greater area</u>. Their nesting habitat is very closely linked to wetland areas where dense grass grows. According to the Ecological Specialist there are wet areas to the west and east of the site that could house owls however the habitat on site is not suitable for grass owls to nest and breed. However having the said the above, it is not unlikely that owls may forage over the area from time to time. Obviously with continued development more and more grasslands and open spaces are being lost and it is a real dilemma however the specialist reiterated that the site is not highly sensitive.

Furthermore the EWT confirmed that there are recent presence and signs of the Grass owl within an 8km radius of the development site. Site A, B and C marked in the below Google image are where there have been activities of the owl, as pellets and their tracking data from the tagged bird confirmed.

The EWT suggested a follow up site visit to these areas and expand it to the east side of the site and Copperleaf Estate area. There may very likely be active Grass owl pairs in the area and they have seen some owls breeding in very peculiar patches in the urbanized spaces. The active pairs indicated in the image below are urban birds which have been observed over many years occupying the only available sites. It is understood they have no other choice but to use these small undesirable patches as they have lost significant portions of their natural habitat in this area in particular.

In response to the EWT response the Ecological Specialist emphasized further that the grass owls might be foraging to the west of the proposed site as those areas are still more open and more likely to have small rodents and hares present as a source of food. It is well understood that there will be some loss of open space within the proposed development, but it is unlikely that this will have a negative impact on owls in the greater region.

- habitats should be considered. The measures to safeguard this habitat as well as general conservation principles must be incorporated into the EMPr.
- Comments from all relevant stakeholders must be adequately addressed and included in the final Basic Assessment report.
- In all aspects of planning, consideration should be given to applying principles of sustainable development such as water and energy efficiencies as well as waste minimisation and green building techniques.
- Facility illustrations have been included in the Draft BAR. However, a legible A3 Layout Plan overlain by a composite sensitivity map on site with a legend easily linked to activity components and the locality map must be included in the Final BAR.
- It is recommended that an ornithological study be undertaken by a registered professional natural scientist in accordance with the Natural Scientist Act (Act No 27 of 2003) to assess the severity and extent the impact the proposed development will have on the red listed bird habitat for the African Grass Owl.

Public Participation Process

Public participation should be in to the minimum accordance requirements of Chapter 6 of the EIA Regulations, 2014. Comments of the Interested and Affected Parties must be recorded, and such written comments including their responses must be included in the final Basic Assessment Report as well as incorporating them in the EMPr where applicable. Legible site notices together with the newspaper adverts as well as proof correspondence (site notice, newspaper advertisement, email, fax, delivery etc.)

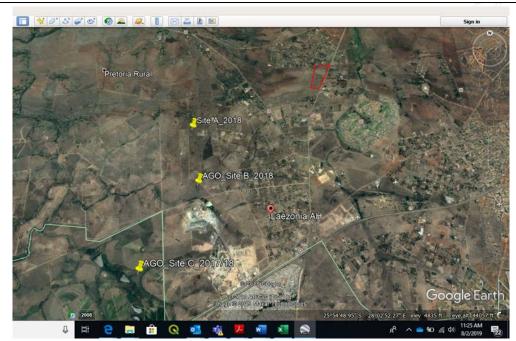


Figure 5: Grass owl presence/activity

• No response required.

Comments on the content of the report

- The Basic Assessment Report was amended to reflect all relevant and feasible alternatives including the No-Go alternative. Additionally principles of sustainable development have also been incorporated in the alternatives discussion. Please refer to Section A, subsection 3 for the discussion of the Alternatives.
- The Environmental Management Programme has been amended to encourage principles of sustainable development such as water and energy efficiencies as well as waste minimistion and building techniques.

The state of the vegetation was discussed in detail in the Specialist report and mention was made of the fact that there is no pristine vegetation present.

Two orange data listed floral species namely *Boophane distitcha* and *Hypoxis hemerocallidea* are present on site and the EMPr has been amended to include measures of how to appropriately handle such floral species when found on site

Comments from all relevant stakeholders have been included in this Comments and

with stakeholders included in the Draft Basic Assessment report are noted by the Department and must be included in the Final Basic Assessment. Notice to all potential interested and affected parties should be in accordance to regulation 41 of the EIA regulations, 2014. Should you be unable to submit comments, proof of attempts that were made to obtain comments must be submitted to the Department.

Response Report and the Final Basic Assessment Report.

- Principles of sustainable development such as water and energy efficiency, waste minimization and green building techniques have been discussed in the Final BAR.
 Please refer to Section A, subsection 3 of the Final BAR.
- A legible A3 Layout Plan overlain by a composite sensitivity map on site is included in the Final BAR. Please refer to Appendix C of the BAR.
- Please refer to response above regarding the presence of African Grass Owls on site. In short, no African Grass Owls were observed on site and the site's ecological state is not capable of hosting such a species. Understandably so, there will be some loss of open space with the proposed development but the ecologist does not believe this will have a significant negative impact on owls in the greater region.

Public Participation

• Comments from I&APs have been included in the Final BAR and are also incorporated in the Environmental Management Programme where applicable.

The proof of Public Participation is included in Appendix E of the Final BAR.

Proof of attempts to obtain comments from the City of Tshwane are also attached in Appendix E: Public Participation, Appendix 11.