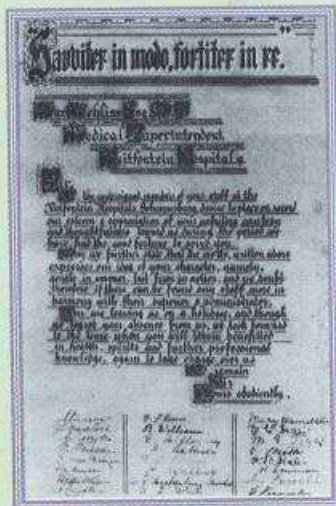


Mehliß's doctor's degree



Acknowledgement made to Mehliß by his staff

had been amongst the ladies of the night in Troyeville. He was a very worried boy. He understood that my Dad had the only specific against syphilis, which was true.

The magnate said 'Will you treat me?' Dad said 'With pleasure. There is a public clinic every Saturday morning. Come and stand in the queue and you will get the same treatment as everybody else'. The magnate said 'That is quite impossible. An important man of my standing.

ment, until he was put in charge of the Rietfontein Hospital, was as District Surgeon in Krugersdorp. As a student in Germany, Mehliß had worked with Paul Ehrlich on the development of Salvarsan or '606', which was considered to be the wonder drug treatment of syphilis at the time. It was when venereal diseases were added to the list of diseases being treated at Rietfontein Hospital, that Mehliß applied for a licence to import Salvarsan, also known as Ehrlich's 'Magic bullet'. This drug was being supplied by Ehrlich for experimental purposes and was used by Mehliß in 1905 before it was publicised.

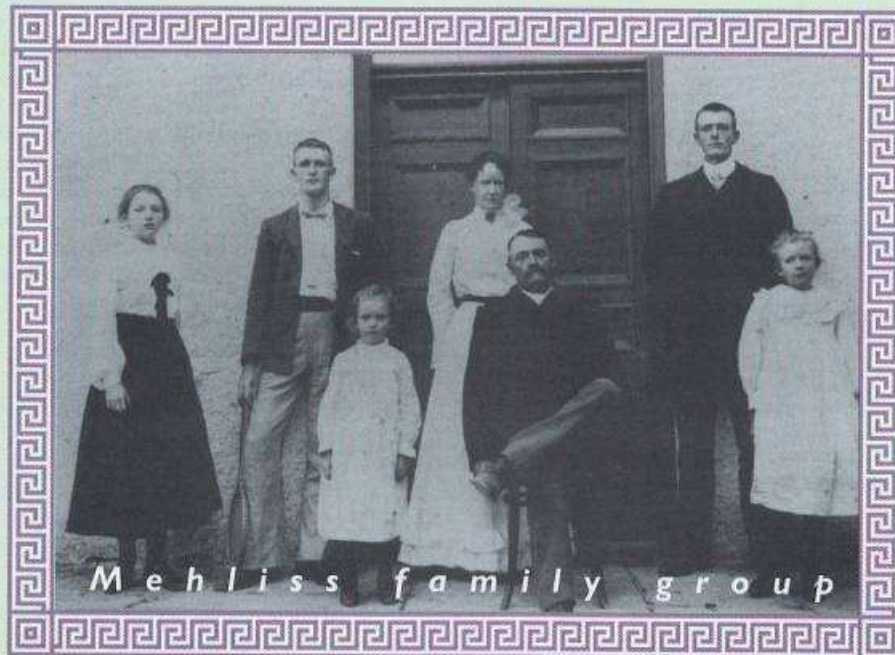
Mehliß was considered one of the best authorities in the country on the diseases he treated. His battle against small-pox and venereal diseases earned him a name of international significance. He died at the age of 59 in 1927 in the Johannesburg General Hospital after suffering a stroke which left him partially paralysed. He was buried at his own request in a pauper's coffin in one of the hospital cemeteries. His plain coffin was draped in the Union Jack and the Vierkleur, and the funeral service was simple as he requested.

Memories of Dr Max Mehliß, Son of Dr John Max Mehliß, and his second wife Edith Theodora Williams

I was only six when my Dad died. He was a surprising man. The hospital was not a very cheerful place, but he was one of those rare medical men who had the time and temperament to involve himself emotionally with his patients.

Most of his patients were black but he also had quite a number of whites. One of them was a mining magnate, a very important man. He came out to see Dad one Saturday morning with a peach of a dose. He had been a very naughty boy. He





Everybody knows who I am. I can't stand in the queue with all the whores in Fordsburg. It won't be very nice'. Dad said 'You should have thought of that before'. He begged and pleaded and said 'Treat me privately. I don't care what it will cost'. He pulled out his chequebook and gave Dad a blank cheque. Dad tore it up. When Dad told Mom about it later she berated him for being a quixotic fool.

It was a Government clinic and ethically Dad was not allowed to take private patients. Mom asked 'Why did you refuse to treat him privately?' Dad said 'The little bastard wore spats.' That was apparently like a red rag to a bull. Dad hated pretension of any sort. He was a simple man but essentially a very good man.

One lunchtime Dad, who was an atheist, and married to my mother, his second wife who was a trained missionary, said 'You are always talking about saints. I would like to introduce you to one. Come down to the hospital after lunch and I will show you one.' After lunch they got into the old Model T Ford and chugged down the road and over the Jukskei River. There we saw two old Africans squatting in the dust. They were both blind and both paralysed. Sitting next to them was a girl of about 18 or 20 with a Madonna-like face. She had an air of serene expectancy. They had come from a very remote village in the then Basutoland. She had heard that somewhere in the north there was a great doctor who could cure anything. She had no money. There was no bus service anyhow. So she had carried the old man 100 yards, put him down, gone back for the old lady, carried her 100 yards and so on. It had taken her three long months and she had begged for their bread. It was an exercise in devotion that was hard to match.





She arrived triumphantly at 'KwaMielies' (the house of Mielies - Dad was known to the Africans as 'Mielies' as they couldn't pronounce his name). Dad said 'I hate this job. How will I tell the poor wretched woman that these two are incurable and have been for many years. There is nothing I can do about it'. It affected him very deeply, and so did the selfless attitude of this girl.

Mother was born in Yorkshire on June 22, 1878. She died in Bulawayo on 1 January, 1969. She received no formal schooling until she was 24 and was accepted for training in the mission field at St Andrew's House, Portsmouth. In 1906 she came to South Africa as a missionary under the auspices of the Society for Propagation of the Gospel which had its headquarters in Buxton Street, Doornfontein.

Life was hard for a missionary in those days. For a salary of 20 pounds she cycled the length of the Rand holding services for African mineworkers in their compounds. Some of her sermons in Sesotho are still preserved. Her duties took her occasionally to Rietfontein to hold services at the lazaretto and the other hospitals there. My father, doyen of the early Rand doctors, was a self-confessed atheist and only grudgingly gave her permission to hold services there. He said 'Why waste time on the souls of the Blacks, I have cut up hundreds of them and never yet found a soul in one of them.' Nevertheless he devoted his own life and soul to their poor diseased bodies. Mrs Mehliiss died and mother received a telegram in 1919 from Dr Mehliiss asking her to marry him.

As a so-called atheist, he lived his Christianity and during his last illness he underwent a remarkable spiritual change, saying to my mother 'What is that black book you are always reading to the children? Read me some of it.' He started to welcome visits from the clergy and his dying words were 'I am going now. Write to me care of Jesus Christ'

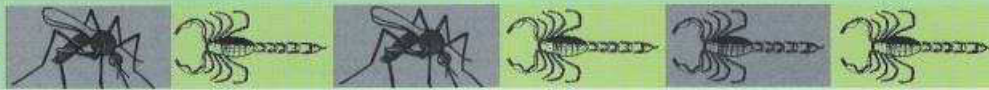


Karl and Max Mehliiss Junior (13 years old)



Grave of Dr Mehliiss



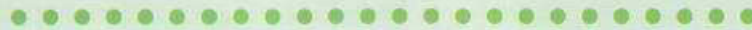


100 Years



RIETFONTEIN TROPICAL DISEASE HOSPITAL

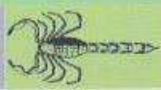
ONE HUNDRED YEARS OF PROUD HISTORY



At the outbreak of smallpox - a highly contagious viral disease, marked by aches, fever, vomiting and skin eruptions leaving pitted scars - the Rietfontein Hospital was established in 1895. It started as a lazaretto for the increasing numbers of these cases occurring in Johannesburg and on the Reef.

The first victim of a subsequent epidemic was a Mr Hunter, a valet of an English nobleman. He contracted smallpox while staying in a hotel on the Reef. With no accommodation for the treatment of such cases available, he was placed in a tent at Hospital Hill where the Fort now stands. More cases of smallpox were diagnosed and a lazaretto under the charge of a medical man was developed. It consisted of tents, wood and iron houses. A Committee, namely the 'Kinder-pokken Komite', a sanitary board, responsible for the management of the camp, was constituted.





Patients rubbing mercury on each other, said to be a cure for syphilis, hence the saying: "One night with Venus leads to a lifetime with Mercury"



'... a tent at Hospital Hill'





A group at Rietfontein showing the old leper hospital in the background.



Bread cart at Rietfontein with a patient from the Chronic Sick Home

Apart from the lazaretto in Hospital Hill, two other camps existed, one at Geldenhuys Estate and one at Luipaardsvlei. At these lazarettos 2 215 patients were treated in 1893. Protests were lodged against the proximity of smallpox and the continuous demands for a properly designed institution to treat the illness obliged the Government in moving the camp to the farm Rietfontein. The farm Rietfontein, 750 morgen in extent, was bought by the Transvaal Republican Government in 1895 from Mr Kieser. It was 'a day's march' from the centre of Johannesburg and considered a safe distance for the isolation of smallpox.

After the epidemic had abated the medical man appointed when the lazaretto was established, was discharged from the Rietfontein camp. Mr Hunter who had recovered from smallpox, remained in charge, but the camp, was still run by the 'Kinderpokken Komite'.

In 1895 the Government decided to take over the smallpox camp and a new committee, which was directly responsible to the Government, was appointed. The committee had to deal with infectious diseases such as smallpox, leprosy and syphilis. It was called the 'Speciale Komite van Gezondheid' and its first duty was to appoint a qualified medical man to be in charge of the hospital. More sanitary and comfortable buildings were erected to replace the old structures which had been of a temporary nature.

Another illness which was frequently found in these early days was leprosy especially among workers recruited for the mines. It was therefore, on the advice of the then Superintendent, Dr John Mehliss, decided in 1897, to build a leper asylum in the vicinity of the present Edenvale Hospital. It had accommodation for thirty patients from Reef towns, consisted of wood and iron structures, was surrounded by a twelve foot galvanised iron fence, and guarded by armed guards. After the British occupation, this hospital - the first leper hospital in the Transvaal - was closed and 29 patients were moved to Westfort Hospital in Pretoria on 6 August 1900. Shortly after their departure about 20 000 sheep captured by the British from the Boers were kept for many months in the deserted enclosure.





100 Years

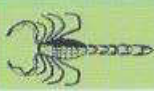
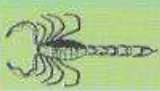
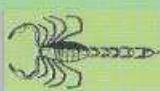
When the smallpox epidemic subsided in 1898, it was possible to make accommodation available at Rietfontein for patients suffering from venereal diseases. Johannesburg was growing rapidly in population and it became necessary to isolate infectious diseases such as measles and scarlet fever. With no facilities being available elsewhere on the Reef, it was decided to use Rietfontein for this purpose. What started as a camp now became known as the Rietfontein Hospital. All mineworkers were examined regularly by medical officers for the detection of leprosy or syphilis as were the inhabitants of the Chinese and Indian 'locations'. In addition, the 'Komite van Gezondheid' successfully fought the epidemic of smallpox. The whole of the Witwatersrand population was revaccinated free of charge. The total population of Johannesburg was vaccinated within four days with every available medical man being engaged by the committee for that purpose.

Immediately after the peace treaty ending the Anglo-Boer War was signed in 1902, the Johannesburg Hospital authorities pressed for accommodation for chronically sick patients as there were insufficient beds for these cases. At the suggestion of Dr Mehrliss and Sir George Turner, then Medical Officer of Health in Johannesburg, for the Transvaal, it was decided to utilise the old leper hospital for this purpose, and on 14 July 1903, the first 18 male patients were admitted.



Outside the chronic Sick Home





100 Years



Sister Burgers



Matron
Bettie Marais

The buildings were the original wards 1 and 2 of what is today the Edenvale General Hospital. It was known as the Chronic Sick Home. Before the end of July 1903 the Home was filled, accommodating 33 male patients. Nursing staff consisted of a matron paid £150 per annum, three certified nurses at £60 per annum, and one non-certified nurse at £30 per annum. The nurses lived in tents and received an extra tent allowance of £1 per month. The care of the patients in the Chronic Sick Home was also the responsibility of Dr Mehliiss.

The plague broke out in Johannesburg in 1904 and a camp was established at Rietfontein where more than 1 000 patients were treated. Those who died had to be buried in a separate plague cemetery. It was in this year that the Transvaal Government purchased the Springkell Sanatorium at Modderfontein. This Sanatorium was originally erected as a hospital for employees of the Modderfontein Dynamite Factory. When the Chronic Sick Home closed in October 1905, the patients were transferred to the Springkell Sanatorium and all the staff were discharged. The Sanatorium was rented to a lady, Dr Arnot, who entered into an agreement with the Colonial Secretary to accept chronically sick patients. They were the so-called 'Government cases' at the rate of twelve shillings and six pence per day.

The Chronic Sick Home was re-opened at its original site on 29 November 1905 and a year later two new wards and a nurses home were added. When the demand for accommodation increased in 1909, Dr Mehliiss permitted the use of veranda beds. This increased the accommodation for patients, bringing the total accommodation to 163 beds: 33 females, 100 males and 30 veranda beds. Ward 5 was also





Dr Mehliß's birthday picnic 1910



Dr Mehliß and his staff



Picnic at Rietfontein

erected during this year to accommodate four male cancer patients.

Conditions which existed at the Rietfontein hospital, despite its services to the community, were far from satisfactory and serious complaints were made concerning the inadequate accommodation, the structurally defective buildings and the lack of electric lights.

On 8 June 1909, the late Dr D Macaulay, Member of the Legislative Assembly (MLA) for Denver, raised questions in parliament on the fire hazard which existed because of the use of paraffin lamps. He asked the Colonial Secretary, General Jan Smuts, whether -

- ☐ 'his attention had been drawn to the condition of the Chronic Sick Home, Rietfontein, in respect of the risk of fire;
- ☐ he was aware that the Home in question was partly built of wood and iron and lit by paraffin lamps;
- ☐ it was a fact that fire had already broken out on three occasions, and
- ☐ in view of the helpless condition of the inmates and the consequent danger of a catastrophe in the case of fire, he had taken or was prepared to take steps to obviate such a danger'.

General Smuts replied that the matter had been under his consideration for some time, that he was aware that the home was partly built of wood and iron, brick-lined, and was lit with paraffin lamps. The installation of electric lights had been carefully considered, but the expense involved would exceed the value of the buildings. It was therefore decided to postpone any expenditure on electric lighting until such time as the Government could see its way clear to erect





100 Years



A patient



Mehrliss and his staff

more up-to-date buildings. He was of the opinion that the existing Home was well equipped with chemical fire extinguishers, and had numerous staff. The three small instances of fire which had occurred were very soon extinguished and were of a minor nature. He stressed that for a considerable number of years they had been going along with the present building, that no accidents had happened yet, and that he hoped that the dire forebodings would not materialise. Although slight mishaps had taken place there, the fires had been very easily put out.

On 16 June 1909, Dr Macaulay, supported by Mr B Owen, Member of Boksburg West, indicated that he regretted that the Minister was not prepared to install electric lights. He feared that a tragedy could happen and that the inmates were running a considerable risk.

Sir G Farrar of Boksburg East added that the installation of electricity would cost only about £4 000 or £5 000. The plant could also be used for pumping water or anything of that kind, if necessary, and also for the other ramshackle buildings. As it would cost only about £5 000 it would not be a big item, and it would mean that a great deal would be saved on the cost of paraffin. He thought that the money would be well spent, especially if it was kept in mind that in 1909 after 28 years buildings were still used and had rendered a very good service.

In 1910 the Home was heavily overtaxed for accommodation. The matter of increasing the accommodation was brought to the notice of the authorities. Protests against the circumstances gained momentum and, on 24 June 1911, The





Pretoria News stated that Rietfontein Hospital was becoming known as "hell on earth". It continued "Besides the hundreds of persons who are treated there for venereal diseases of the worst kind, there are in the institution about 100 whites of all nationalities who with the motto 'all hope abandon ye that enter here', have been carried inside. Their diseases are incurable, they are confined to their beds or to their chairs until their bodies are carried to the grave. Most of them cannot move... their treatment is excellent... but their lodgings - galvanised iron shanties - are shocking compared with the aristocratic housing of Dr Theiler's horses and mules in Onderstepoort. There prevails a worse state of affairs still. The buildings, in which those helpless human wrecks are lying, are lighted by paraffin lamps. Three times already has there been an outbreak of fire which luckily was checked in the beginning, otherwise those patients would have been burnt alive. Several times has the Transvaal Government been asked for an electric installation costing a few hundred pounds - without success, however. Dr Theiler's horses and mules, again have electric light in their 'rooms'. Can the Administration deny that such conditions rightly deserve the adjective 'shocking'?"

The Reverend Eustace Hill, English Church Priest, visited Rietfontein as the English Church Chaplain and his views were expressed forcibly in a letter published in the Transvaal Leader, dated 20 September 1911. The letter had the desired effect and in addition to an article in the newspaper which accompanied the published letter, prompted an independent inspection of

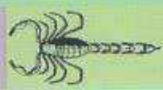


Marriage of Viola Coch, Hospital Secretary's daughter at Rietfontein.
Front: Kate Barrett / Viola Coch / Hettie Mehliiss (nee Barrett)
Back: third from the left- Max Coch, Mehliiss boy, Dr Mehliiss.



Rietfontein Hospital staff, 1925 : Mr Coch, Hospital Secretary is second from the left, in front, and Dr Mehliiss in the middle.





Nursing sister at Rietfontein



Matron



Patients at Rietfontein

Rietfontein Hospital by a representative of The Leader. His report was published in The Leader of 20 October 1911, under the heading "Disgraceful state of affairs and a new Scandal found". In it he stated that he was received most courteously by the staff who placed the fullest facilities for seeing the building and general arrangements at his disposal. Everything and every place was thrown open to his inspection. His opinion was that if Rev Hill, in his letter, called the lazaretto a public disgrace it was too mild a phrase. "It is a gross and intolerable scandal, a disgrace to the Government, and a reproach to the town. The buildings, generally speaking, have been said to be unsuitable. 'Unsuitable' isn't the word; they are outrageous." The reporter mentioned the objectionable proximity both of the white male and female venereal wards and of the black male and female wards. According to him this posed a danger not only to the spread of infection but also to morals. While he praised the work of Dr Mehrliss and his dedicated staff he was appalled at the conditions in which they worked. "The need for improvement is crying", he concluded, "...whatever the cost, the present state of affairs should not be allowed to continue."

The storm of criticism was brought to a head following the sad death of a little boy who had been taken to the institution with measles and there contracted scarlet fever from which he died. As a result the mayor of Johannesburg was requested to summon a public meeting in order that the prevailing conditions at the lazaretto

100 Years





Rietfontein Hospital staff, 1932



**May 1946 - Mr JEM Coch's
farewell party**



**Father Christmas pays visit at
Rietfontein**

and the urgent need for radical reform might be discussed.

The meeting was held on 16 October 1911 and the resolution taken read as follows:

"This meeting of the citizens of Johannesburg strongly condemns the conditions of the lazaretto and calls upon the Government to take immediate steps to remedy the present state of affairs."

In all the criticism levelled at the lazaretto no reflection was ever cast upon the work of Dr Mehliiss and his helpers. Everybody was full of praise for the work of the staff. This was the case amongst the patients as well and The Leader man reported that one of the patients had asked him to mention that the patients one and all wished to express their gratitude to Dr Mehliiss and his assistants for their unceasing attention and kindness towards their charges.

Until 1913 paraffin lamps only were used for lighting purposes. On several occasions various parts of the wards caught fire. The fires were, however, extinguished on each occasion without serious damage.

In July 1913, the present Recreation Hall, the first brick building to be erected, was completed and was used for concerts and bioscope entertainments.

After agitation for over six years by Dr Mehliiss the Government agreed to install electric lights throughout and to lay on water-borne sewerage. These works were completed in 1914.

It was not until 1921, when it was decided to construct further buildings of a permanent nature, that this extra accommodation was provided. A complete new layout was decided upon, and the two new wards number 6 and 7 were built to





were built to accommodate 36 patients. This building was the nucleus of the proposed new Chronic Sick Home.

In 1923 a hospital for formidable epidemic diseases was added to the Rietfontein portion of which served as an infectious diseases hospital; and in 1936 a pulmonary tuberculosis hospital was built. As the demand for accommodation for other infectious diseases decreased the beds were made available for tuberculosis patients, since the disease was on the increase. The complex of new buildings included an operating theatre and a X-ray department.



Staff members providing entertainment for patients at the hospital

Ward 8 consisting of 6 beds was built in 1924, bringing the total accommodation up to 155 beds. All the wards were filled in a very short time and in 1925 further pressing appeals were made for extra accommodation by Dr Mehliiss.

Early in 1927 Dr Mehliiss was taken seriously ill and Dr Croghan acted in his place as Medical Superintendent. The institution sustained a great loss on 30 July 1927 through the death of Dr Mehliiss, the founder of the Rietfontein Hospital and the chronic sick home. He was a man who was greatly loved and respected by patients and the staff.

The Provincial Authorities being undecided as to whether the permanent Home was to be at Rietfontein or in Pretoria, no further buildings of a permanent nature were erected.

To meet the pressing demand for extra accommodation, however, a temporary wood and iron building - wards 9 and 10 - was erected in June 1927, to accommodate 36 patients, thereby bringing the total accommodation to 191.

A temporary wood and iron structure was also erected to accommodate the European Domestic Staff. The Medical



Unknown nursing staff





**Marriage of Mrs Connor,
Radiographer at Rietfontein.**



Mr Coch and Dr Jos Daneel

Superintendent, Dr J Daneel, assumed duties in succession to the late Dr Mehliß on 22 August 1927, on transfer from the Leper Institution, Pretoria.

In 1933 the Administrator in Executive Committee decided to invite competitive designs from Architects for a new Home, the first prize being awarded to Mr JS Bowie of Benoni in 1934. This home accommodated 288 patients. Further buildings which were to be completed with the new Provincial Home were a Nurses Home, a modern Laundry and Native Staff Quarters. It was then decided that the name of the Institution should be "The Transvaal Provincial Home".

The Edenvale General Hospital was established on the first of January 1949 and this necessitated the discharge of the chronic sick patients.

In 1936 the services of the Rietfontein Hospital were extended to accommodate tuberculosis patients. Portions of the farm were made available for the Poliomyelitis Research Foundation, now the National Institute of Virology, and a hostel and school for the care of juvenile delinquents, Norman House, also an institution for the rehabilitation of alcoholics. Land was purchased by Rand Aid for the establishment of a retirement village and accommodation for the elderly.

In 1939 there was a major epidemic of smallpox and wards 8 and 9 were added and isolated from the rest of the complex. These proved inadequate and tents were erected. Patients were dying at the rate of 20 to 30 a day and 8 grave diggers were kept fully employed. Quicklime was poured into the graves. During this epidemic a certain Jan Christiaan Smuts rode innocently on his bicycle through the hospital gate and past the yellow flag, intent on collecting botanical specimens. He was arrested by the gate-keeper, Mr Matthysen, and taken to be forcibly vaccinated.

100 Years

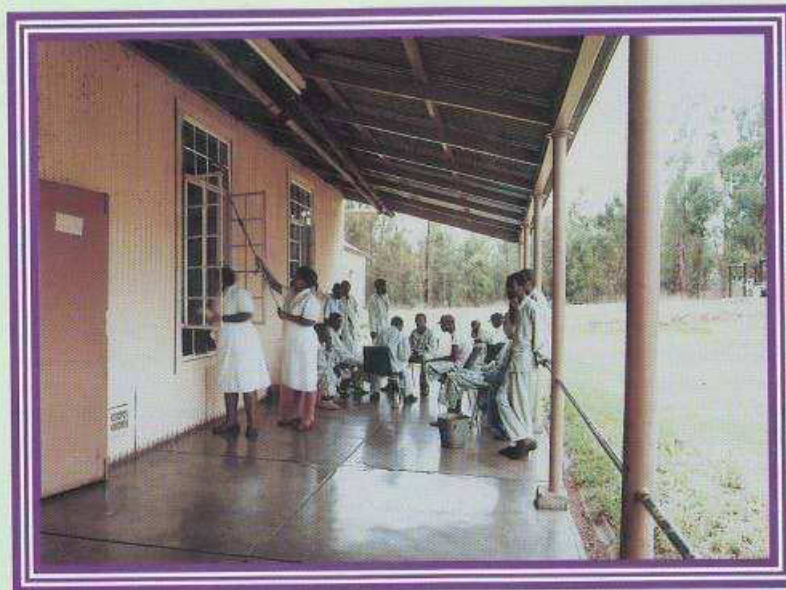




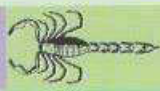
Until 1970 Rietfontein Hospital was self-sufficient as far as dairy products were concerned and it had its own poultry section. At one stage the whole dairy farm was moved to solve the problem of flies in the area. These activities ceased when the eastern bypass was planned bisecting the land to the east of the N3-freeway which housed the dairy farm and has been developed as a housing scheme.

After the Johannesburg Fever Hospital was closed at the end of March 1978, Rietfontein Hospital provided facilities for all infectious diseases and at the same time high-security isolation facilities were provided for highly infectious haemorrhagic virus diseases such as Marburg, Congo and Lassa Fever. This unit is the only one of its kind in Africa and one of very few in the world.

The hospital has approximately 600 beds and serves as a referral centre for the Transvaal, and further afield, for suspected cases of pulmonary tuberculosis in which diagnosis of the disease has not been confirmed by bacteriological examination of sputum. Further investigations such as bronchoscopy and bronchography, lung, pleural and mediastinal lymph node biopsies are also done. Major surgery such as resection of lobes and lungs damaged by tuberculosis is also performed regularly. As a consequence of the diagnostic facilities provided, a wide spectrum of non-tuberculosis pulmonary conditions are seen at the hospital.



The older wards are still in use today





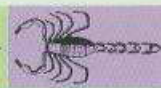
A forgotten piece of history

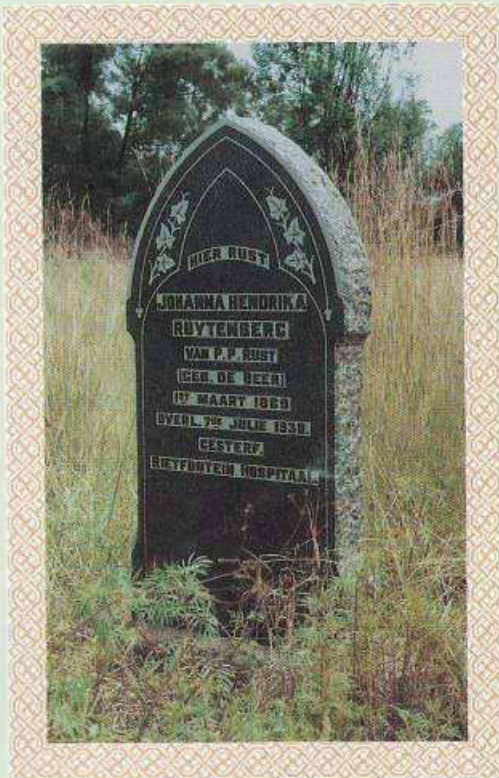
A small piece of history, including various graves overgrown with veld grass lie hidden among the trees in three graveyards.

Last year the graves of the hospital's first Superintendent, Dr John Max Mehliiss, Matron Mary Middler, who was in charge at the Transvaal Provincial Home from 1926 to 1945, and that of Nurse Emily Blake were moved from their original burial sites to a more prominent position in front of the Hospital.

Emily Blake was a dedicated and beloved nurse who cared for plague patients. She arrived in March 1899 on the SS Kilburn in Saldanha Bay where she nursed at the Uitvlugt Hospital in Pinelands during the Cape Town epidemic. That hospital closed on 30 November 1901 after which she came to Rietfontein where she died in March 1904 at the age of 27 of Bubonic Plague. It is said that she contracted the disease after kissing a child goodnight. She was buried in grave number 218 at the plague cemetery.

People buried in one of the graveyards include the Guthrie family and Sidney James Sanford, the third son to the Rev Canon Sanford of Clonmel, Ireland. The other graveyard was created for victims of Johannesburg's bubonic plague epidemic in 1904. Most of the graves have no names and are only marked by numbers. The graves all face north-east across the valley which separates them from the Modderfontein dynamite factory in the distance. The headstones - some ornate and others mere wooden crosses - have in many cases been broken by vandals.

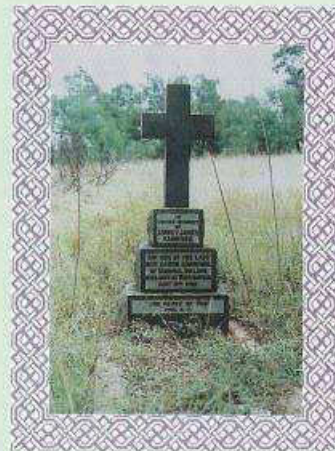
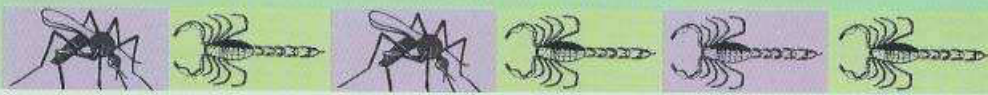




Of cultural-historic interest at the hospital are the century-old hospital wards. The oldest existing wards are ward 1 and 2, constructed of wood and iron. They were reputedly used as barracks for British troops during the Anglo-Boer War. It is, however, uncertain whether they were specifically built for this purpose, or were originally wards for smallpox patients.

A prime objective is the spacious home which was built in 1900 for the first Superintendent of the hospital, Dr John Max Mehliiss. The house lies to the west of the hospital and locals hope that it can eventually be declared a national monument and converted into an educationally orientated centre.

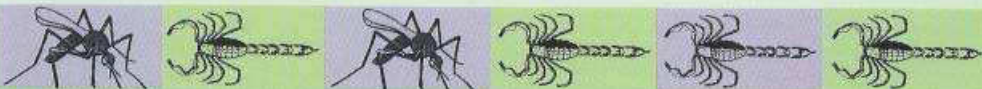




Various graves lie hidden in three graveyards



The house of the first Superintendent may eventually be declared a national monument and be converted into an educationally-orientated centre





Rietfontein - Nature Conservation Value

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From the time that the government purchased the farm Rietfontein to erect a hospital in 1894, the development of the farm and the access thereto has largely been restricted. This control has been advantageous for the natural environment which has remained largely undisturbed.

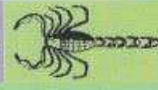
The area around the hospital consists of 15 hectares of pristine grassland. This area, as well as the riverine areas, should be conserved not only because of the nature conservation value but also for research work on seeds and some threatened highveld plants and grass species.

To conserve this area will ensure the long-term preservation of the pristine grassland. The water-courses, wetlands and grasslands generally will remain in public ownership and will be freely accessible to the public.

The nature conservation area predominantly slopes in two directions, namely north-east and south-east at an average slope of 1:13 and 1:16 respectively. The Jukskei River with its one in fifty year floodline divides the area in two distinct portions. Two tributaries which feed into the Jukskei River also flow through the planning area. They flow strongly during the rainy season.

A survey of the natural vegetation undertaken by a team of five specialists revealed that although a large amount of vegetation is found throughout the area, a specific area of approximately 15 hectares in extent consists of a high diversity of indigenous plant species which is of extreme nature conservation value, this, together with the wetlands and rainforests being three of the most threatened habitat types in the world today. The lack of knowledge and awareness by the general public has resulted in the destruction of this habitat type. In particular on the Highveld where a high degree of urbanization and land disturbance has taken place, very little of the pristine Bankenveld grassland still remains.

Surveys have revealed that there are two main plant communities within the hospital area, namely riverine vegetation and open grassland. The open grassland can be divided into four sub-communities according to their specific composition and the extent of disturbance. The plant com-





☐ Grassland in pristine condition

This community is a very good example of a pristine grassland with a very high plant species diversity. The Bankenveld veld type is characterised by a number of bulbs and perennial plants, that is 500 to 700 species in a representative area. At Rietfontein more than thirty species of grasses and perennial plants have been identified. The dominant grasses found are *Themeda triandra*, *Brachiaria serrata*, *Digitaria tricholaenoides* and *Heteropogon contortus*. A high diversity of insect species is indicative of a pristine grassland habitat.

☐ Previously disturbed grassland in good condition

These are the areas at Rietfontein that have been disturbed in the past by livestock grazing. This resulted in the land being dominated by a single grass species, namely *Themeda triandra*. The dominance of this grass species is indicative of reasonably good veld conditions where the species diversity is extremely low, implying that it has not fully recovered.

☐ Ploughed land in poor condition

This category consists of land that was last cultivated some eighteen years ago and where the soil fertility was probably not maintained during the period it was cultivated. Since the soil fertility is low it cannot support a dense stand of typical climax grasses resulting in a community which is very low in species diversity, biomass and cover. The dominant grasses found here are *Eragrostis curvula*, *Eragrostis chloromelas*, *Hyparrhenia hirta* and *Cymbopogon excavatus*, all of which are indicators of disturbed veld.

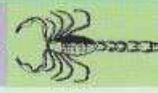
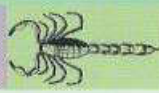
☐ Eucalyptus Plantation

A plantation comprising of several exotic eucalyptus species is located within the area. The area where this plantation is found, in all probability was inhabited by indigenous trees and plants such as *Protea caffra*, *Acacia caffra*, *Celtis africana*, *Acacia karroo* and *Rhus lancea*.

☐ Riverine Vegetation

The riverine area is unfortunately highly disturbed and dominated by the invasion of undesirable exotic plant species, that is the dominant tree species now being Australian *Acacias*.





BEHIND THE SCENES AT RIETFONTAIN TROPICAL DISEASE HOSPITAL

Over the years patients and staff at the Rietfontein Hospital have had a good giggle, or maybe stifled a tear, on recalling the incidents, happy and sad, which make up the daily life of the hospital.

These are some of the memories that have brought smiles and tears to the dedicated staff members over the years.

They recall:

- ☐ The day Radiographer Sheena Connor was locked into a light-tight mobile darkroom. Inside featherweight Sheena hammered and tugged frantically, while outside several heavyweight rugby types did their best to tug open the door and rescue dainty Sheena. Eventually all their efforts were rewarded and a much relieved Sheena was released.
- ☐ The hilarious tuckshop debacle when it was not hamburgers and hotdogs that were handed out through the serving hatch, but senior citizens, being tuckshop volunteers. The new door fitted to the tuckshop that morning had stubbornly refused to open and there was nothing for it but to usher the ladies out through the flap so that they could go off shift and return home.
- ☐ A patient wearing bright green stockings took French leave and was apprehended as she was about to enter a getaway taxi, by hospital security guards who had been given a description of the stockings worn by the escapee.
- ☐ Resident monkeys took great delight in rendering the windscreens of parked cars slippery by urinating on them and then playing slip and slide down the glass.
- ☐ Medunsa students had to go lunchless when the monkeys had got into their kombi through a broken window and ate all their sandwiches.
- ☐ The monkeys eagerly awaited the arrival of the animal-loving doctor who regularly arrived bearing bananas for them.
- ☐ A doctor's meeting ended hilariously when a ceiling collapsed bringing down on their heads a load of eight cats and kittens.
- ☐ A ballroom demonstration by one of the Sisters and her partner, both elegantly attired, was accompanied unbeknownst to them, by a clever comic mime by a Sister in knee-length red passion killer pantaloons, and her large ungainly and anything but elegant partner.





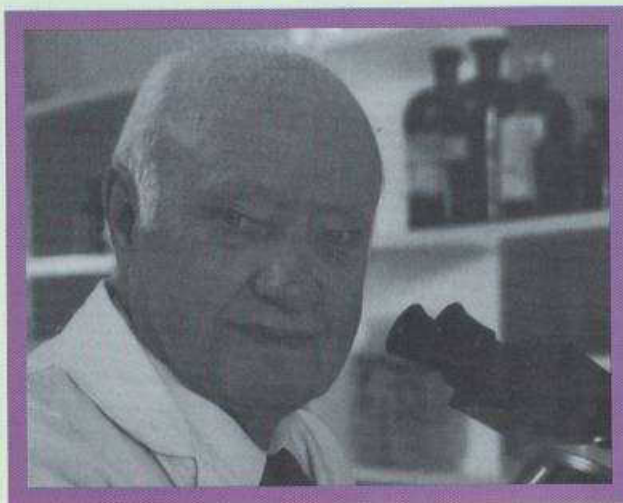
- ☐ A production of Shakespeare's "Julius Caesar" proved to be a tremendous success - as a comedy!
- ☐ Child patients stand at the window of one of the doctor's offices and pull faces at him until he gives them sweets.
- ☐ A Black woman telephoning to enquire about her husband who worked at the hospital was told that 'he was late'. She got the fright of her life thinking she was being told that he had passed away.
- ☐ Patients having heard such good reports of the hospital have walked there from as far afield as Zimbabwe and have been admitted not for what they thought ailed them, but to recover from exhaustion, dehydration and sore feet.
- ☐ A tiny nun, 5 feet tall and as broad, was sent to the hospital to fetch a pair of peacocks. She had staff and patients in hysterics as she hitched up her habit and ran hither and thither around the grounds trying to capture the birds.
- ☐ Children, admitted as babies, on being discharged in some cases, years later, are each provided with a suitcase, clothes and lunch for the journey home.
- ☐ Priscilla Deakin, a Radiographer was mortified to hear her appeal read out in church coming out as "Priscilla urgently needs a pushchair". The pushchair was of course not for Priscilla's own use, but for a mother, a patient at the hospital who used to pull her baby around in a cardboard box.
- ☐ A little patient, a soccer enthusiast who had a drainage tube in his side attached to a bottle that he had to carry around with him at all times, was nonetheless not deterred from joining in the games at the hospital. He simply clamped up the tube and joined in. Sadly when the staff saw him sometime later, he was brought to the hospital as a prisoner needing treatment. He insisted that he was not guilty and had been framed. When the staff saw him again it was in happier circumstances, he was then an assistant to an outside electrical contractor doing work at the hospital.
- ☐ The ladder of an outside electrical contractor that started to sway alarmingly by mid morning, caused great amusement, especially when the man took great pains to assure everyone that he drank only coke.
- ☐ Prof James Gear's special birthday cake that a colleague produced each year was always decorated with plastic bugs, flies, mosquitoes - whatever insects had been discussed at medical seminars attended by the doctors.
- ☐ A cupid-playing sister introduced a merry blue-eyed old gentleman and an elderly lady - both patients - and the two immediately fell in love and decided to marry.





Rietfontein honours the greats

PROF JAMES GEAR - AN APPRECIATION



Prof Gear at work in his laboratory

James Henderson Sutherland Gear, the second son of John Gear, was born in Germiston on 8 April 1905. He attended the Germiston High School and matriculated at St John's College. In 1926 he was awarded a BSc Hons degree from the University of the Witwatersrand and qualified in medicine 3 years later, winning the Bronze Medal of the Medical Association of South Africa for the most distinguished graduate. In 1932 he added a Diploma in Public Health to his other qualifications, and then the Diploma in Tropical Medicine and Hygiene (1933) and the Diploma in Bacteriology (1935) from the University of London.

In 1930 James Gear joined the staff of the South African Institute for Medical Research (SAIMR) where he remained for the duration of his professional career.

To give a detailed description of Gear's research achievements over the 53 years that followed his appointment (he had some 200 publications to his credit on a wide variety of subjects) would require a book. Even to give a brief outline of all the research projects in which he played a leading role would be beyond the scope of this appreciation. One can but mention some of the highlights in the career of this remarkably versatile research worker - and that is difficult enough since his whole life-work seems to have been marked by an endless series of scientific summits, which gained for South Africa an honoured place in the world medical community.





In the field of haematology he worked on onyala, providing the first, and remarkably accurate, description of this syndrome in South Africa. Particularly in his work on hyperreactive auto-allergic and hyporeactive immune deficiency diseases he propounded a hypothesis, many years ahead of its time, which contributed greatly to an understanding of the pathogenesis of the auto-immune diseases. Of importance is that these studies proved of particular relevance in the development of cancer research and the graft acceptance and rejection phenomenon.

Tropical medicine remained Gear's first love through the years - malaria and blackwater fever, trypanosomiasis, relapsing fever, sporotrichosis and other fungal infections, bilharzia, especially its geographical distribution, pathogenesis, pathology and immunological reactions, and chlamydial infections. Perhaps he made his greatest contributions in this field in his studies of the rickettsial diseases and arthropod borne virus infections in southern Africa.

His virus research, which increasingly occupied his attention in recent years, deserves special mention.

Gear is perhaps best known for his poliomyelitis work in the laboratories of the Poliomyelitis Research Foundation of which he was research director. This research culminated in the production of a vaccine against the virus which was available for issue at the same time as that developed by Jonas Salk in the USA. It was indeed Gear's idea that such a foundation be established in this country - a project towards which the public contributed half a million pounds.

He started research into the Coxsackie viruses soon after their discovery in the USA in 1947 and was the first in the world to show that the Coxsackie B virus could cause myocarditis in babies. His other virus studies concerned the echoviruses, respiratory virus infection, serum hepatitis and virus infections of the newborn and their importance as causes of congenital defects. In recent years he played a leading role in the control of the African viral haemorrhagic fevers, particularly in the Marburg virus incident in Johannesburg.

Apart from poliovirus vaccine, Gear was involved in the development and improvement of numerous vaccines against rickettsial, chlamydial and other virus infections. From 1940 to 1945 Gear served as a major in the South African Medical Corps, first as a medical officer in a mobile laboratory, then as Deputy Director of Pathology in the Union Defence Force, and ultimately as Officer Commanding, Medical Laboratory Service.

In 1950 he became Deputy Director of the SAIMR and 3 years later took on, in addition, the post of Director of Research of the Poliomyelitis Research Foundation. In 1960 he was appointed Director of the SAIMR - a post he occupied with great distinction until his retirement in 1973. It was a retirement in name only, for he remained on the staff of the SAIMR as consultant in tropical diseases and consultant in virology to the Department of National Health and Population Development through the National Institute for Virology. He remained active as a teacher, too. From 1960 he was honorary professor in the Department of Tropical Diseases at the School of Pathology of the University of the Witwatersrand and the SAIMR, and honorary research professorial fellow in the Department of Virology. He played an important role in teaching candidates for the D.T.M. & H..





Professor Gear served on the most important national and international bodies. He was at various times a member of the Health Advisory Council of the State Health Department, of the Prime Minister's Scientific Advisory Committee, of the Council for Scientific and Industrial Research's Committee for Research in Medical Sciences, and of the first South African Medical Research Council.

He served on no fewer than four World Health Organization Expert Committees (those on viruses, poliomyelitis, yellow fever and biological standardization) and on four WHO Study Groups (ricketsial diseases, immunology, trachoma and bilharzia). It is doubtful whether any other person has ever been recognized by the WHO as a world authority in so many fields.

It was inevitable that the international medical research community would recognize Professor Gear's work and he was the recipient of some of the highest professional honours over the years. Among them are the Chalmers Medal of the Royal Society of Tropical Medicine and Hygiene in recognition of his research of outstanding merit in tropical medicine; the Bruce Memorial Medal and lectureship of the American College of Physicians, London; honorary membership of the Infectious Diseases Society of America and of the American Society of Tropical Medicine; the Manson Medal of the Royal Society of Tropical Medicine and Hygiene; foreign associateship of the National Academy of Sciences, USA; and a Rotary International Fellowship for "his major contributions to medicine and medical research throughout a remarkable career".

He also received numerous honours in the land of his birth. Among them are honorary MD degrees from the Universities of the Witwatersrand, Natal and the Orange Free State; the Silver Medal of the Medical Association of South Africa for distinguished service to medical science and humanity; the Gold Medal of the MRC; Fellowship of the Royal Society of South Africa; the Claude Harris Leon Foundation Award of Merit for his outstanding contribution to human health; Medal of Honour of the Suid-Afrikaanse Akademie vir Wetenskap en Kuns; and honorary membership of the South African Society of Microbiology and of the South African Society for Plant Pathology. He was also Honorary Life President of the South African Renal Society.

In spite of all these honours and achievements, he was a humble, modest man. He was one of the greats in world medicine, yet he remained a compassionate doctor who cared about the sick. This has been the main driving force behind James Gear.

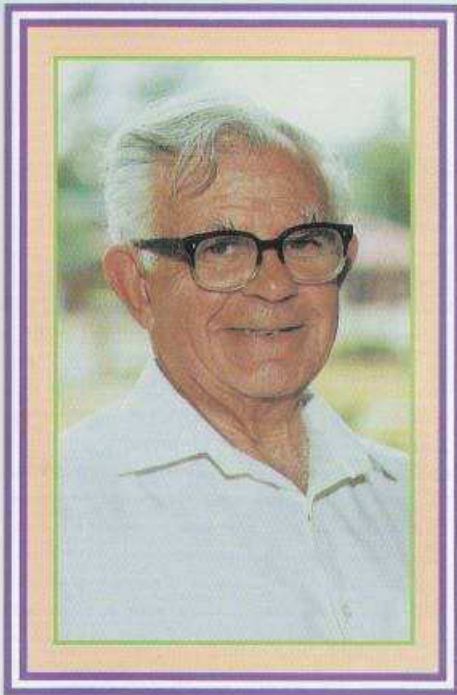
We wish to thank Marais Malan, Chief, Editorial Services, SAIMR, for his assistance in compiling this appreciation.





DR BENNIE MILLER

by Dr L. Blumberg



Dr Bennie Miller is recognised as an authority on Tuberculosis and Infectious Diseases in the Tropics, and is the Principal Medical Officer at Rietfontein Hospital.

After seeing service in North Africa during World War 2, he qualified in Medicine at the University of the Witwatersrand, Johannesburg in 1952.

His career has been devoted to the practice of Clinical Infectious Diseases, first at the Waterval Hospital in the Western suburbs of Johannesburg where he gained extensive experience in the management of Diphtheria & Polio, diseases which seldom manifest themselves nowadays because of successful immunization campaigns. Thereafter he continued to build his reputation in the field at CMR Hospital. The 'Fever Hospital' in Johannesburg and for the last 17 years at Rietfontein.

From the exotic to the unusual, there are few infections Dr Miller has not treated - malaria, filariases, measles, meningo-coccal meningitis, bilharzia and Congo fever to name but a few.

His skills as a teacher have been appreciated by generations of medical students, and doctors studying for the Diploma in Tropical Medicine at the Universities of the Witwatersrand and Pretoria. Frequent consultations by his colleagues bear testimony to his skills in his chosen field.

Dr Miller has contributed to numerous scientific publications, including published therapeutic trials for tick bite fever, in collaboration with the late Professor James Gear.

He is regarded as an expert in the management of viral haemorrhagic fevers, was part of the team managing Marburg Virus victims, treated in Johannesburg in 1975, and was invited to Namibia in 1980 to manage a Marburg fever epidemic there. A caring and humble doctor, and a devoted family man, Dr Miller is married to Miriam, has two daughters and enjoys sport in his





PROFESSOR MARGARETHA ISAÄCSON

by Dr J A Frean



Professor Isaäcson qualified in medicine at the University of the Witwatersrand in 1963. After her internship she joined the staff of the South African Institute for Medical Research where she has remained, apart from overseas studies, until her retirement in 1993. She specialised in microbiology and her duties at the Institute included heading a new Department of Epidemiology. In 1979, she was appointed to the Chair of Tropical Diseases in the School of Pathology of the South African Institute for Medical Research and the University of the Witwatersrand. She has received several diplomas and degrees and numerous local and overseas honours, have been conferred on her. She has served as a consultant for the World Health Organisation. Her interest in various aspects of infectious diseases and epidemiology led to a long association with Rietfontein Hospital and its predecessor, the old Fever Hospital, particularly in the field of viral haemorrhagic fevers. Professor Isaäcson was at the forefront of investigations in the Marburg virus disease outbreak in southern Africa in the seventies, and she was a founder member of the International Medical Commission which assembled in Zaire in 1976 to investigate the

world's first epidemic of Ebola virus infection. Her other areas of expertise include health aspects of water re-use, cholera, malaria, hospital acquired infections and travel medicine. Professor Isaäcson's long involvement in the field of the treatment of plague in southern Africa echoes one of the original functions of Rietfontein Hospital: that of an isolation hospital for victims of the plague epidemic which swept the country at the turn of the century. Professor Isaäcson was appointed Emeritus Professor of Tropical Diseases at the University of the Witwatersrand on her retirement from the Institute in 1993, and she remains involved in the teaching and research activities of the Institute and University.





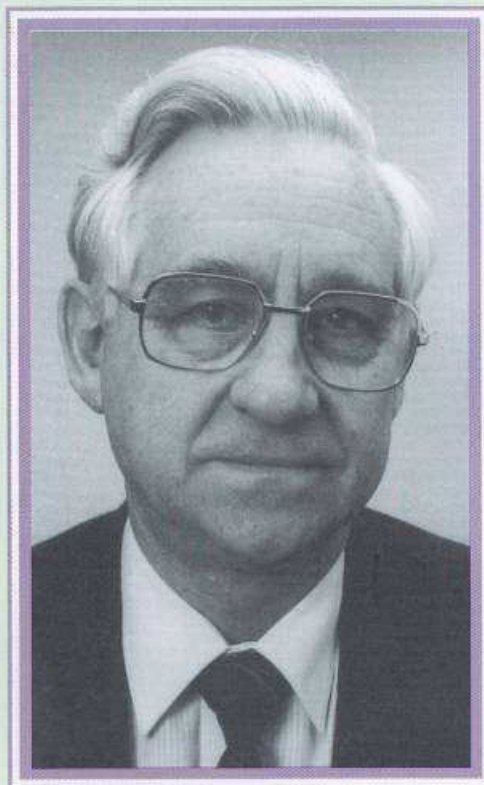
PROFESSOR HENDRIK KOORNHOF

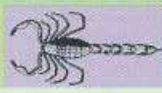
by Dr GB Miller

The old Fever Hospital at the top of Hospital Hill closed in 1978 and patients with infectious and tropical diseases were admitted to Rietfontein Hospital. The tradition established in the early 1950's of the "Thursday morning ward rounds" where cases of interest were presented and discussed continued at Rietfontein Hospital.

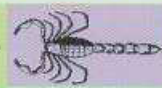
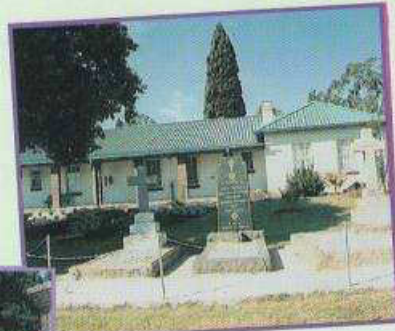
Professor Koornhof has been involved in these meetings since the days when he was a young registrar at the South African Institute of Medical Research. He attended these meetings regularly both before and after the move to Rietfontein. We have watched him grow in stature over the years to become a world authority in bacteriology.

The popularity of the "Thursday rounds", as they have become known, is in no small measure due to Professor Koornhof's presence. All have benefitted from his remarkable knowledge and wisdom and many a doctor's problems have been solved in informal discussions with him during the tea break after the round. We would like him to know how much we appreciate his regular attendance at our hospital.



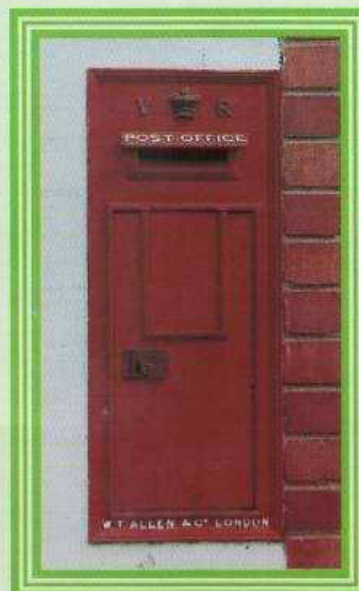


Renovations 1995





**Coat of Arms of Rietfontein
Hospital as registered by the
Bureau of Heraldry**



**Old Victoria Regina postbox still
in use today**



**Our sincere thanks and appreciation to all who
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User7

From: Juanita <user3@bokamoso.net>
Sent: Tuesday, July 15, 2014 1:21 PM
To: cjvrensburg@iqgroup.net
Subject: RE: Linksfield Mixed Use Development

Dear Carl Janse Van Rensburg,

Thank you for your response, I have registered you as Interested and/or Affected Party Member for the proposed Linksfield Mixed Use Development Project.

We will keep you updated regarding the process in the future.

Hope this finds you well.

Kind Regards

Juanita De Beer

Public Participation Consultant



**Landscape Architects &
Environmental Consultants**

T: (+27)12 346 3810 | F: (+27) 86 570 5659 | E: lizelleg@mweb.co.za | www.bokamoso.net
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

From: Carl Janse Van Rensburg [<mailto:cjvrensburg@iqgroup.net>]
Sent: 15 July 2014 12:47 PM
To: lizelleg@mweb.co.za
Cc: dsmndward@gmail.com
Subject: Linksfield Mixed Use Development

Hi Juanita

I am staying in nr 28 Flame Crescent Dowerglen Ext 3, Edenvale and is a member of the Dickey Frits Roadclosure Committee and wants to register to receive continuous updates as well as being invited to public meetings regarding the abovementioned development.

Kind Regards,
Callie van Rensburg

cell: +27 82 925 5892 email: cjvrensburg@iqgroup.net

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User7

From: Juanita <user3@bokamoso.net>
Sent: Friday, July 25, 2014 2:28 PM
To: 'dinur@mweb.co.za'
Subject: RE: Linksfield Mixed Use -graveyards- Junita

Dear Naomi,

Thank you for your response, I have noted all your issues on our Issues and Comments Register.

We will keep you updated regarding the process in the future.

Hope this finds you well.

Kind Regards

Juanita De Beer

Public Participation Consultant



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From: Naomi Dinur [<mailto:dinur@mweb.co.za>]
Sent: 23 July 2014 05:06 PM
To: 'Bokamoso'
Subject: RE: Linksfield Mixed Use -graveyards- Junita

Dear Junita,

The places of the graveyards:

There is a point that I thought will be covered when your people will come here-(but it was cancelled)
it seems that Urban Dynamics drawings do not reflect the graveyards place
as they actually were.

1. **One graveyard** was in a straight line from the Police Station to Club street Extension

Opposite Sandringham high, about 100 meters deep.

I have pictures of the graves from 1995. (with the metal markers in some cases - attached is that of Mlangeni)

2. Another graveyard I have seen was all along Club Street Extension-from the first graveyard to the nursery-facing the golf course. There were several tombstones, the wooden crosses burned-

But a picture from the 70's show some of them clearly.

That graveyard **was all along that road**. (and the bottom were the girls graves near the nursery.)See pic from the 70'

3. Another graveyard I have seen is about 200 meter away from the road.

I managed to photograph two tombstones now in 2014 there.

4. There is the first original graveyard near the river on the other side of the hospital.

Now in 2014 I managed to photo only one complete tombstone and some broken ones.

5. The Jewish graveyard was not located yet.

I was told by Mr. Busser that **they burned the people with communicable diseases**.

I have evidence that it was not so at all- they were actually **buried**.

However- they poured lime inside the coffins of the Smallpox victims.

They **also buried the Bubonic Plague** victims (Re: Emily Blake etc).

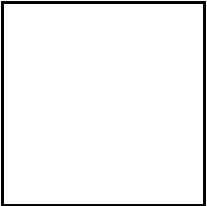
Mr. Busser also claimed that people were buried very packed (near each other).

I saw contrary evidence. (see the pic attached for spacing between tombstones)

Hope this helps.

Kind regards,

Naomi Dinur



This email is free from viruses and malware because [avast! Antivirus](#) protection is active.

User7

From: Juanita <user3@bokamoso.net>
Sent: Monday, July 21, 2014 1:23 PM
To: naomidinur@gmail.com
Subject: RE: Development intended for Farm Rietfontein

Dear Naomi Dinur,

Welcome back, thank you for all the information.

I have noted all your comments on our Issues and Comments Register.

Hope this finds you well.

Kind Regards

Juanita De Beer

Public Participation Consultant



**Landscape Architects &
Environmental Consultants**

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From: Naomi Dinur [<mailto:naomidinur@gmail.com>]
Sent: 17 July 2014 05:33 PM
To: Marian Laserson
Cc: Lynne van der Schyff; Zabeth Zuhlsdorff; bewaring@es.org.za; Peter Moss; Bokamoso
Subject: Re: Development intended for Farm Rietfontein

Dear all,
I have returned from Israel.
While it is hot summer - it was raining rockets
(The place we stayed did not have any shelter).

I located one very interesting document today:
an interview with **Elizma Van Staden**, CEO of Sizwe
Dated Oct. 2004 (she worked there from 1978)
She says the following:

1. There were about 7000 graves.
2. There were 5 gravesites but only 3 sites had been identified
3. That Anthrax and Ebola were not treated in the past 20-25 years at Sizwe
-so clearly they were treated before.
[The interview was in 2004)
4. She was adamant that building should not be erected on the land
due to the lack of knowledge of the grave's location.

Best regards,
Naomi Dinur

Naomi Dinur
Hebrew Sworn Translator
Mobile: 0824961111

On Thu, Jul 10, 2014 at 11:09 AM, Marian Laserson <laserson@telkomsa.net> wrote:
Good Morning Cecilia,

The situation is as follows:

1. The property is owned by Province. The portion which they wish to develop is about 171 ha.
2. It contains the Sizwe Tropical diseases Hospital, currently treating mainly TB and AIDS. This hospital is over 100 years old and contains some buildings which have been declared as Heritage Buildings. The Heritage Foundation does have a file on some of these, but I am not sure if all the buildings are listed. I saw the file (if I remember - 3 folders) when I went to Heritage. However, I did not look into the files because I was there on other business.
3. Currently, Province has engaged a company called Equicent Infrastructure Developers (who are about 4 years old but seem to be a consortium of other developers, Centurion being one). The proposal is 8 400 "Affordable" housing, of which 4 000 are to be in single stands and the others in 3 - 6 storey buildings. Affordable housing is pitched at people who earn between about R3 500 to R15 000 per month. They also want to build two schools, a recreation centre and a shopping centre.
4. Equicent has commissioned Bokamoso (Land Scape Architects) to conduct the EIA. We are currently awaiting the Draft EI Report from Bokamoso. Their Scoping Report contained virtually nothing on Heritage and I have taken them to task on this.
5. Equicent has also commissioned Urban Dynamics (Town Planners) to apply to the City of Johannesburg for establishment of township. Objections to this closed end of April 2014. There were about 3 000 objections, according to CoJ Urban Management. I have heavily criticised this application for township establishment - before the completion of the EIA.
6. Heritage issues: Estimates and reports vary regarding the number of graves, (anywhere between 1 000 and 7 000) but all the graves are over 60 years old. Most of the metal markers of the graves have long since been

stolen, and there has been illegal dumping on many of the graves. Thus the locality of probably two-thirds of the graves has been lost. Records are very slim, apparently being lost in a fire at the hospital.

7. The site also contains rubbish dumps of hospital waste of archaeological value dating back over 70 years. I have also heard that they buried their contaminated bedding in unmarked pits on the property

8. There are also many environmental issues - wetlands, grasslands, high water table, 100 year flood line, red data species, etc. which have not been addressed yet in the EIA.

If I can help you further, please do not hesitate to contact me.

M A R I A N P L A S E R S O N
PROFESSIONAL ARCHITECT Registration No. 3841 Pr.Arch(SA), B.Arch(Rand),
M.I.A.T., Dip.APP.

12 Prince of Wales Street P O Box 46212 Tel: (011) 640-2345
Fairwood Orange Grove Fax: 086 608 6104
2192 2119 South Africa Cell: 083 959 8937
E-mail: laserson@telkomsa.net

----- Original Message -----

From: [Lynne van der Schyff](#)
To: [Naomi Dinur](#) ; [Marian Laserson](#) ; [Zabeth Zuhlsdorff](#) ; bewaring@es.org.za
Sent: Wednesday, July 09, 2014 10:23 PM
Subject: Fwd: Development intended for Rietfontein Cemetery

Hello everyone

I hope you are all well. I received this e mail today. It appears to be a follow up to an e mail that I originally sent to Peter Moss when I was canvassing for objections

Please would someone respond to this lady, Cecelia Kruger, as I think you would be in a better position to advise her than I could. She is from the Heritage Foundation and appears to be very concerned. I have had no contact with Bokamasa myself so I don't even know who to put her in contact with.

Has anyone heard anything regarding the initial report from Bokamasa?

Regards
Lynne

Sent from my iPad

Begin forwarded message:

From: "Cecilia Kruger" <bewaring@es.org.za>
Date: 09 July 2014 at 1:26:54 PM SAST
To: Itumeleng Masiteng <imasiteng@sahra.org.za>
Cc: Mimi Seetelo <mseetelo@sahra.org.za>, "pindoll64@gmail.com" <pindoll64@gmail.com>, PETRO COREEJES-BRINK <CoreejasP@cput.ac.za>, "peter.moss@mweb.co.za" <peter.moss@mweb.co.za>, Stephanie Kruger

<projekinfo@es.org.za>, Riana Mulder <museum@es.org.za>
Subject: FW: Development intended for Rietfontein Cemetery

Dear Itu

I hope this mail finds you well?

Please see attached concerns re development where there are an estimated 1000 or more graves
?

Do you know anything about a permit application or and EIA / HIA that was done by the
developers who seem to be Bokamoso Landscape Architects and Environmental Consultants.
Tel: (012) 346 3810 Fax: 086 570 5659 E-mail: lizelleg@mweb.co.za

Would appreciate it if you could let me know? We have numerous organisations including the
Genealogy Society of SA who are extremely concerned about this alleged project.

Kind regards

Cecilia

Cecilia Kruger
Senior Manager: Heritage Conservation
pp. Managing Director
The Heritage Foundation
Tel: 012 - [325 7885](tel:3257885) / [323 9050](tel:3239050)
Cell: 083 417 4411
Fax: 086 267 1428
www.erfenisstigting.org.za

-----Original Message-----

From: Estelle Pretorius
Sent: 10 June 2014 07:12
To: Cecilia Kruger; Riana Mulder; Liesl Bester; Stephanie Kruger
Cc: Zabeth Botha; Petra Swanepoel; Malene Schulze
Subject: FW: Development intended for Rietfontein Cemetery

Cecilia

Hierdie is skrikwekkend. Ek het uitgevind wie die ontwikkelaars is:

Bokamoso Landscape Architects and Environmental Consultants.
Tel: (012) 346 3810 Fax: 086 570 5659 E-mail: lizelleg@mweb.co.za

Estelle

-----Original Message-----

From: Peter Moss [<mailto:peter.moss@mweb.co.za>]

Sent: 25 May 2014 12:05

To: PETRO COREEJES-BRINK

Subject: FW: Development intended for Rietfontein Cemetery

Dear Petro,

Thanks for a useful day yesterday.

Attached hereto as discussed the correspondence regarding the low cost housing development at Rietfontein Plague Hospital, the area contains graves of people who died of infectious diseases. Unfortunately the Register was lost in a fire many years back, and the estimate of burials ranges from 2200 to 4500..

Hope that you can send it to someone who can bring more pressure to bear on the authorities.

Thank you

Best regards

Peter and Beverley

-----Original Message-----

From: Peter Moss [<mailto:peter.moss@mweb.co.za>]

Sent: 19 May 2014 20:06

To: Lynne van der Schyff

Cc: Derek Walker; 1John Schwartz; Alan Buff; jazulu@vodamail.co.za

Subject: RE: Development intended for Rietfontein Cemetery

Dear Lynne,

Many thanks for your mail, I would say that with the pace hotting up we receive at least 1 mail a day on the subject! I have enclosed an Outline of our Project for your information.

Many years back we tried to obtain the burial registers, but were advised that they had been lost in fire. We even checked the Transvaal Archives in Pretoria, without success.

We have various pieces of information, the most informative being a survey by Derek Walker (who has now unfortunately relocated to the UK) as per the attached email. The blue links are to photos in the eGSSA albums. There are several other emails, but with the number of interested parties increasing all the time, it is becoming very confusing.

This information is rather disjointed - unfortunately we are not able to become the leaders of the Project!

We hope that this helps in some way, please keep in touch.

Best regards

Peter and Beverley

Data Coordinators, DVD Project

GSSA Cemetery Recording Project

Subject: Development intended for Rietfontein Cemetery

Dear Mr Moss

I found your contact details on the internet. We are desperately trying to stop the development Sunningdale ext 13 to 20 intended for the Historical Rietfontein Tropical Diseases Hospital and Cemetery.

Bokamasa, the land development consultants are insisting that there are only two cemeteries there with 2200 graves in total. As most of the documents were destroyed in a fire at the hospital we are struggling to find evidence of thousands more graves. They want proof. Is there any possibility that your organization may have done some research here and perhaps you may have some records? There are many news paper articles which state that there are in excess of 5000 graves. They also deny that there were any graves for animals who perished from Anthrax.

This is a huge concern for the surrounding communities. Any assistance that you can give us would be truly appreciated

Sincerely
Lynne van der Schyff

Sent from my iPad=

Hello everyone

I hope you are all well. I received this e mail today. It appears to be a follow up to an e mail that I originally sent to Peter Moss when I was canvassing for objections

Please would someone respond to this lady, Cecelia Kruger, as I think you would be in a better position to advise her than I could. She is from the Heritage Foundation and appears to be very concerned. I have had no contact with Bokamasa myself so I don't even know who to put her in contact with.

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Regards
Lynne

Sent from my iPad

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> From: "Cecilia Kruger" <bewaring@es.org.za>
> Date: 09 July 2014 at 1:26:54 PM SAST
> To: Itumeleng Masiteng <imasiteng@sahra.org.za>
> Cc: Mimi Seetelo <mseetelo@sahra.org.za>, "pindoll64@gmail.com" <pindoll64@gmail.com>, PETRO
COREEJES-BRINK <CoreejasP@cput.ac.za>, "peter.moss@mweb.co.za" <peter.moss@mweb.co.za>,
Stephanie Kruger <projekinfo@es.org.za>, Riana Mulder <museum@es.org.za>
> Subject: FW: Development intended for Rietfontein Cemetery
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> Dear Itu
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> Cecilia
>
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> Cecilia Kruger
> Senior Manager: Heritage Conservation
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> www.erfenisstigting.org.za
>
>
>
>
> -----Original Message-----
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> Sent: 10 June 2014 07:12
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> Cc: Zabeth Botha; Petra Swanepoel; Malene Schulze
> Subject: FW: Development intended for Rietfontein Cemetery
>
> Cecilia

> Hierdie is skrikwekkend. Ek het uitgevind wie die ontwikkelaars is:
>
> Bokamoso Landscape Architects and Environmental Consultants.
> Tel: (012) 346 3810 Fax: 086 570 5659 E-mail: lizelleg@mweb.co.za

> Estelle

> -----Original Message-----

> From: Peter Moss [mailto:peter.moss@mweb.co.za]
> Sent: 25 May 2014 12:05
> To: PETRO COREEJES-BRINK
> Subject: FW: Development intended for Rietfontein Cemetery

> Dear Petro,

> Thanks for a useful day yesterday.

> Attached hereto as discussed the correspondence regarding the low cost housing development at Rietfontein Plague Hospital, the area contains graves of people who died of infectious diseases. Unfortunately the Register was lost in a fire many years back, and the estimate of burials ranges from 2200 to 4500..

> Hope that you can send it to someone who can bring more pressure to bear on the authorities.

> Thank you

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> Cc: Derek Walker; 1John Schwartz; Alan Buff; jazulu@vodamail.co.za
> Subject: RE: Development intended for Rietfontein Cemetery

> Dear Lynne,

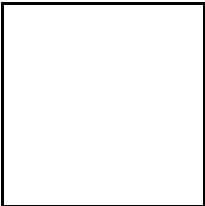
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> Many years back we tried to obtain the burial registers, but were advised that they had been lost in fire. We even checked the Transvaal Archives in Pretoria, without success.

> We have various pieces of information, the most informative being a survey by Derek Walker (who has now unfortunately relocated to the UK) as per the attached email. The blue links are to photos in the eGSSA albums. There are several other emails, but with the number of interested parties increasing all the time, it is becoming very confusing.

> This information is rather disjointed - unfortunately we are not able to become the leaders of the Project!

>
> We hope that this helps in some way, please keep in touch.
>
> Best regards
> Peter and Beverley
> Data Coordinators, DVD Project
> GSSA Cemetery Recording Project
>
> -----Original Message-----
> From: Lynne van der Schyff [mailto:pindoll64@gmail.com]
> Sent: 18 May 2014 20:14
> To: peter.moss@mweb.co.za
> Subject: Development intended for Rietfontein Cemetery
>
> Dear Mr Moss
>
> I found your contact details on the internet. We are desperately trying to stop the development Sunningdale
ext 13 to 20 intended for the Historical Rietfontein Tropical Diseases Hospital and Cemetery.
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> Bokamasa, the land development consultants are insisting that there are only two cemeteries there with 2200
graves in total. As most of the documents were destroyed in a fire at the hospital we are struggling to find
evidence of thousands more graves. They want proof. Is there any possibility that your organization may have
done some research here and perhaps you may have some records? There are many news paper articles which
state that there are in excess of 5000 graves. They also deny that there were any graves for animals who
perished from Anthrax.
>
> This is a huge concern for the surrounding communities. Any assistance that you can give us would be truly
appreciated
>
> Sincerely
> Lynne van der Schyff
>
> Sent from my iPad=
>
>
>
>



This email is free from viruses and malware because [avast! Antivirus](#) protection is active.

User7

From: User1 <user1@bokamoso.net>
Sent: Monday, July 28, 2014 4:46 PM
To: user3@bokamoso.net
Subject: FW: The Rietfontein Jewish Graveyard- a breakthrough

Flag Status: Flagged

From: Marian Laserson [<mailto:laserson@telkomsa.net>]
Sent: 25 July 2014 04:37 PM
To: Naomi Dinur; Bokamoso; Lynne van der Schyff; Peter Moss; Zabeth Zuhlsdorff; Cecilia Kruger
Cc: Chaim Silver; N Malka
Subject: Re: The Rietfontein Jewish Graveyard- a breakthrough

Dear Naomi,

I am again amazed at your tenacity and untiring research. Thanks so much for this. It is very interesting.

I notice that the date of birth is not given for one of them and that another was just 4 years old. Very sad!

Regards

Marian

----- Original Message -----

From: [Naomi Dinur](#)
To: [Bokamoso](#) ; [Marian Laserson](#) ; [Lynne van der Schyff](#) ; [Peter Moss](#) ; [Zabeth Zuhlsdorff](#) ; [Cecilia Kruger](#)
Cc: [Chaim Silver](#) ; [N Malka](#)
Sent: Friday, July 25, 2014 9:09 AM
Subject: The Rietfontein Jewish Graveyard- a breakthrough

Dear all,

After a long time and tiring research I found yesterday some **evidence** for the "alleged" Jewish graveyard on Rietfontein grounds.

[my source covers it from 1905 till 1919].

I have a list of 26 (Twenty Six) names of people who were buried there, until the year 1919.

(So there is a reason to believe that there were more graves in the other 35 years).

Attached are 3 names for your information.

Have a good weekend,

regards,

Naomi Dinur
Hebrew Sworn Translator
Mobile: 0824961111



This email is free from viruses and malware because [avast! Antivirus](#) protection is active.

User7

From: Bokamoso <lizelleg@mweb.co.za>
Sent: Thursday, July 24, 2014 8:47 AM
To: user3@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: Linksfield Mixed Use -graveyards- Junita
Attachments: 1Elzami Mlangeni.JPG; 1 Wooden cross and some crosses in background.JPG

Flag Status: Flagged

From: Naomi Dinur [<mailto:naomidinur@mweb.co.za>]
Sent: 23 July 2014 05:06 PM
To: 'Bokamoso'
Subject: RE: Linksfield Mixed Use -graveyards- Junita

Dear Junita,

The places of the graveyards:

There is a point that I thought will be covered when your people will come here-(but it was cancelled)
it seems that Urban Dynamics drawings do not reflect the graveyards place
as they actually were.

1. **One graveyard** was in a straight line from the Police Station to Club street Extension
Opposite Sandringham high, about 100 meters deep.
I have pictures of the graves from 1995. (with the metal markers in some cases - attached is that of Mlangeni)
2. **Another graveyard** I have seen was all along Club Street Extension-from the first graveyard to the nursery-
facing the golf course. There were several tombstones, the wooden crosses burned-
But a picture from the 70's show some of them clearly.
That graveyard was all along that road. (and the bottom were the girls graves near the nursery.)See pic from the 70'
3. Another graveyard I have seen is about 200 meter away from the road.
I managed to photograph two tombstones now in 2014 there.
 4. There is the first original graveyard near the river on the other side of the hospital.
Now in 2014 I managed to photo only one complete tombstone and some broken ones.
5. The Jewish graveyard was not located yet.

I was told by Mr. Busser that **they burned the people with communicable diseases**.
I have evidence that it was not so at all- they were actually **buried**.
However- they poured lime inside the coffins of the Smallpox victims.
They **also buried the Bubonic Plague** victims (Re: Emily Blake etc).
Mr. Busser also claimed that people were buried very packed (near each other).
I saw contrary evidence. (see the pic attached for spacing between tombstones)
Hope this helps.
Kind regards,
Naomi Dinur



This email is free from viruses and malware because [avast! Antivirus](#) protection is active.

Loura

From: Loura <user9@bokamoso.net>
Sent: Friday, October 10, 2014 11:49 AM
To: naomidinur@gmail.com
Cc: 'user1@bokamoso.net'
Subject: LINKSFIELD:
Attachments: image001.jpg

MAPS OF THE LINKSFIELD SITE:

Good day Naomi,

Thank you for your e-mail of the 10th October 2014, it refers. Kindly send us the Town Planners' outlay and plans and maps of the Linksfeld site you received.

Please also confirm receipt of this e-mail.

Kind regards,

Loura du Toit (on behalf of Anè Agenbacht - Senior F&P/ Manager)
Personal Assistant to Anè Agenbacht



T: (+27)12 346 3810 | F: (+27) 86 570 5659 | E: lizelle@mwweb.co.za | www.bokamoso.biz
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

User1

From: Bokamoso <lizelleg@mweb.co.za>
Sent: Friday, October 10, 2014 10:50 AM
To: user1@bokamoso.net
Subject: FW: LINKSFIELD:

From: Naomi Dinur [mailto:naomidinur@gmail.com]
Sent: 10 October 2014 10:07 AM
To: Bokamoso
Subject: Re: LINKSFIELD:

Dear Ane,
Some of the graveyards (some are on other sections of the property)
e all along Club Street extension, the top from across Sandringham high and ran up to the Nursery. The nursery is situated on top of the last one.

The plan showed by Urban dynamics showed roads and buildings on top of the graveyards-
on Club street extension road.

Regards,
Naomi Dinur

Naomi Dinur
Hebrew Sworn Translator
Mobile: 0824961111

On Thu, Oct 9, 2014 at 4:31 PM, Bokamoso <lizelleg@mweb.co.za> wrote:

Dear Naomi

Thank you for your email and update.

In order for us to discuss this matter with you please provide us with this map for ease of reference. We are not sure of which map you are referring to.

Thank you,

Ane Figenbacht

Senior Environmental Assessment Practitioner / Manager

Tel: 012 346 3810

Cell: 083 533 0420

Email: lizelleg@mweb.co.za (Attention: Anè)



Landscape Architects &

Environmental Consultants

T: (+27)12 346 3810 | F: (+27) 86 570 5659 | E: lizelleg@mweb.co.za | www.bokamoso.biz

36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

From: Naomi Dinur [<mailto:naomidinur@gmail.com>]

Sent: 08 October 2014 08:55 AM

To: Bokamoso

Subject: Re: LINKSFIELD:

Dear Anè,

I saw a presentation by Urban Dynamics, where the houses and streets were on the graveyards,

Their houses were on Linksfeld extension road.

The exact extent and final drawing of the graveyards should be drawn in cooperation with a forensic archaeologist-

my map shows the location of the graveyards, but not to each grave location, as it was done according to witnesses.

I am happy to discuss it with you as I have just returned from abroad.

Kind regards,
Naomi Dinur

Naomi Dinur
Hebrew Sworn Translator
Mobile: 0824961111

On Wed, Oct 8, 2014 at 8:41 AM, Bokamoso <lizelleg@mweb.co.za> wrote:

MAPS OF THE LINKSFIELD SITE:

Good day Naomi,

Attached please find your map and the maps compiled by the architects and town planners appointed to the Linksfield Project. Kindly note that your map differs from their maps. It seems that your map is not exactly on scale.

You are welcome to discuss this matter with our Project Manager MS Ane Agenbacht: 083 533 0420 / 012 346 3810.

Kindly confirm receipt of this mail.

Kind regards,

Louisa du Toit (on behalf of Anè Agenbacht – Senior EAP/ Manager).

Personal Assistant to Anè Agenbacht



(+27)12 346 3810 | F: (+27) 86 570 5659 | E: lizelleq@mweb.co.za | www.bokamoso.biz

36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161



This email is free from viruses and malware because avast! Antivirus protection is active.

Loura

From: Loura <user9@bokamoso.net>
Sent: Friday, September 12, 2014 9:23 AM
To: naomidinur@gmail.com
Cc: 'user1@bokamoso.net'
Subject: LINKSFIELD:
Attachments: image001.jpg

RE: CEMETRIES IN THE RIETFONTEIN HOSPITAL GROUNDS NOW CALLED SIZWE HOSPITAL:

Good day Naomi,

We would like to thank for your e-mail of the 11th September 2014 with the list of private individuals you consulted with. It would be much appreciated if you can forward their contact details to us as well as the other names you do not have right now later on. Kindly forward MS Elizma van Staden's contact details to us as you mentioned that you had an interview with her. (Your e-mail of the 29th August 2014).

Also thank you for the list of your source of investigation. Kindly forward all other articles and proof of your findings to me in future. Please confirm receipt of this e-mail.

Kind regards,

Loura du Toit (on behalf of Anè Agenbacht – Senior JRP/ Manager)
Personal Assistant to Anè Agenbacht



T: (+27)12 346 3810 | F: (+27) 86 570 5659 | E: ljzellen@mweb.co.za | www.bokamoso.biz
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0181

Loura

From: Bokamoso <lizelle@mweb.co.za>
Sent: Thursday, September 11, 2014 4:02 PM
To: user9@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: LINKSFIELD:

From: Naomi Dinur [mailto:naomidinur@gmail.com]
Sent: 11 September 2014 03:41 PM
To: Bokamoso
Subject: Re: LINKSFIELD:

Dear Loura,
Regarding the map:

Hereby is the list of private individuals I consulted with:

Karl Kohler,
Marial Laserson,
Eben De Villiers,
Greame Wood,
Helen Zwicky,
Mary Andre
Miriam Miller
Stan Sneeceh
Dave fisher
others (I do not have all the names right now).

Written material was collected from:

the Pretoria National Archives, Cape Town national Archives, Strange Library, Adler Library, Sizwe file, the National Virology Institute library, the internet -various sites, Eggsa, The Mormon church library, Chevra Kadisha archive, Rietfontein Hospital publications, Edenvale Archives, JHB GIS and some private individual's sources.

All the best,
Naomi Dinur

On Thu, Sep 11, 2014 at 9:44 AM, Bokamoso <lizelle@mweb.co.za> wrote:

RE: CEMETRIES IN THE RIETFONTEIN HOSPITAL GROUNDS NOW CALLED SIZWE HOSPITAL:

Loura

From: Loura <user9@bokamoso.net>
Sent: Thursday, September 11, 2014 9:45 AM
To: naomidinur@gmail.com
Cc: 'user1@bokamoso.net'
Subject: LINKSFIELD:
Attachments: image001.jpg

RE: CEMETRIES IN THE RIETFONTEIN HOSPITAL GROUNDS NOW CALLED SIZWE HOSPITAL:

Good day Naomi,

Our previous e-mails we sent you still refers and are still unanswered. Kindly provide us with proof of evidence of the source you made use of to compile the map we received from you on the 21st August 2014. Also please provide us in writing the names, contact details as proof of the interviews you had with people.

It would be much appreciated if you can provide us with the contact details of MS Elizma van Staden, the ex-CEO of the Sizwe Hospital. You mentioned in your e-mail of the 29th August 2014, that you had an interview with her and kindly provide proof of this as well.

Please confirm receipt of this e-mail.

Kind regards,

Loura du Toit (on behalf of Anè Agenbacht - Senior L&P Manager)
Personal Assistant to Anè Agenbacht



T: (+27)12 346 3610 | F: (+27) 86 570 5659 | E: lizellen@myweb.co.za | www.bokamoso.biz
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Merceiana 0161

large centres of population in the Union. But there is, nevertheless, reason to believe that this prevalence is very real and alarming, and also that it is increasing, especially amongst Whites, partly because of the reluctance and tardiness of sufferers to secure skilled treatment, and partly because sufficient facilities have not hitherto existed either for diagnosis or treatment.

Appended are particulars in regard to the cases of Venereal Diseases treated (a) at Johannesburg Hospital, and (b) at the Rietfontein Lazaretto, during the three official years ending 31st March 1916:-

(a) JOHANNESBURG HOSPITAL.

913-16	Whites.						Coloured.					
	Out-Patients.		In-Patients.		Sent Rietfont.		Out-Patients.		In-Patients.		Sent Rietfont.	
	M.	F.	M.	F.	M.	F.	M.	F.	M.	F.	M.	F.
s.	25	27	35	15	10	10	70	52	18	11	26	5
Dec.	13	-	17	6	11	-	34	6	9	-	9	-
anere.	-	-	-	-	-	-	-	-	-	-	-	-

(b) RIETFONTein LAZARETTO.
(Kindly supplied by Dr. Mehliss).

6.	Whites from		Coloured from	
	Johannesburg	Elsewhere.	Johannesburg	Elsewhere.
	705 *	121	1472	3039

User1

From: Bokamoso <lizelle@mweb.co.za>
Sent: Thursday, September 11, 2014 11:10 AM
To: user9@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: LINKSFIELD:
Attachments: Elizma Van Staden 2004.pdf

From: Naomi Dinur [mailto:naomldinur@gmail.com]
Sent: 11 September 2014 11:07 AM
To: Bokamoso
Subject: Re: LINKSFIELD:

Jear Loura,

Thank you for the e-mail.

After consultation and their confirmation I will e-mail you the list, however, you can interview Eben De Villiers from the Nursery corner Club exention and Linksfeld road right away
He had been there over 30 years.

Regarding Mrs Van Staden attached is the interview I referred to.
(You misread my comment).

I have my set of Aerial photos from the 1930',
but I requested to receive the set that Mr. Busser referred to,
However I did not receive a reply. Kindly forward us the photos.

While compiling I also went through many old documents and maps.

As a start I suggest you check Reminiscences 1895-1995 Rietfontein Hospital publication -
pages 12, (we can see which graveyard was the plague burial ground
and which was called the "Top cemetery"
also page 23 which describes the procedure of burial
and why they changed the venue of the graveyard.
(The other graveyards were dug in the 40' when he left).

However, **The proof on the ground is the strongest evidence-**

I suggest to meet with your experts and show the extent of the graveyards
at the Rietfontein grounds graveyards.

I will travel abroad from the 18th September till the beginning of October-
so either meet me now or in October.

Kind regards,
Naomi Dinur

Naomi Dinur
Hebrew Sworn Translator
Mobile: 0824961111

On Thu, Sep 11, 2014 at 9:44 AM, Bokamoso <lizellep@mweb.co.za> wrote:

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Kind regards,

Louisa du Toit (on behalf of Anè Agenbach - Senior F&P/ Manager)

Personal Assistant to Anè Agenbach



T: [\(+27\)12 346 3810](tel:+27123463810) | F: [\(+27\) 86 570 5659](tel:+27865705659) | E: lizelle@mwab.co.za | www.bokamoso.biz

36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Marolana 0161

Loura

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Cc: 'user1@bokamoso.net'
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Attachments: image001.jpg

RE: CEMETRIES IN THE RIETFONTEIN HOSPITAL GROUNDS NOW CALLED SIZWE HOSPITAL:

Good day Naomi,

The previous e-mails we sent you are still not answered. Kindly provide us with proof of evidence of the source you made use of to compile the map we received from you on the 21st August 2014. Also provide us in writing the names, contact details as proof of the interviews you had with so many people.

It would be much appreciated if you can provide us with the contact details of MS Elizma van Staden, the ex-CEO of the Sizwe Hospital. You mentioned in your e-mail of the 29th August 2014, that you had an interview with her and kindly provide proof of this as well.

Please confirm receipt of this e-mail.

Loura du Toit (on behalf of Anè Agenbacht - Senior E&I Manager)
Personal Assistant to Anè Agenbacht



T: (+27)12 346 3810 | F: (+27) 86 570 5658 | E: lizeleq@nweb.co.za | www.bokamoso.biz
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11376 Maroelana 0101

Loura

From: Loura <user9@bokamoso.net>
Sent: Monday, September 08, 2014 10:43 AM
To: rietfonteinheritageationgroup@gmail.com
Cc: 'user1@bokamoso.net'
Subject: LINKSFIELD;
Attachments: image001.jpg

RE: CEMETRIES IN THE RIETFONTEIN HOSPITAL GROUNDS NOW CALLED SIZWE HOSPITAL:

Good day Naomi,

A reminder that our previous e-mails still refer. We need your proof of evidence of the source you made use of to compile the map you provided us with on the 21st August 2014. Kindly provide us in writing the names, contact details and proof of the interviews you had with so many people.

Also kindly provide us with the contact details of MS Elizma van Staden the ex- CEO of the Sizwe Hospital. Apparently you had an interview with her . You mentioned this in your e-mail of the 29th August 2014. Can you submit proof of this as well?

Please confirm receipt of this e-mail.

Regards,

Loura du Toit (on behalf of Anè Agenbacht - Senior JAG/ Manager)
Personal Assistant to Anè Agenbacht



T: (+27)12 346 3810 | F: (+27) 86 570 5659 | E: lizellec@mweb.co.za | www.bokamoso.biz
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

Loura

From: Loura <user9@bokamoso.net>
Sent: Friday, September 05, 2014 9:16 AM
To: rietfonteinheritageationguroup@gmail.com
Cc: 'user1@bokamoso.net'
Subject: LINKSFIELD:
Attachments: image001.jpg

RE: CEMETRIES IN THE RIETFontein HOSPITAL GROUNDS NOW CALLED SIZWE HOSPITAL:

Good day Naomi,

It would be much appreciated if you kindly can confirm receipt of our daily e-mails. Our previous e-mails still refer and we still need your proof of evidence concerning the source you made use of to compile the map you attached to your e-mail of the 21st August 2014. Kindly also provide us in writing the names, contact details and proof of the interviews you had with so many people.

We would appreciate it if you can provide us with the contact details of Elizma van Staden the ex-CEO of the Sizwe Hospital, as you referred to her in your e-mail of the 29th August 2014.

Please confirm receipt of this e-mail.

Kind regards,

Loura du Toit (on behalf of Anè Agenbacht - Senior E&P/Manager)
Personal Assistant to Anè Agenbacht



T: (+27)12 346 3810 | F: (+27) 86 570 5659 | E: lizelle@mwweb.co.za | www.bokamoso.biz
38 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Marolana 0161

Loura

From: Loura <user9@bokamoso.net>
Sent: Thursday, September 04, 2014 9:03 AM
To: rietfonteinheritageationgroupp@gmail.com
Cc: 'user1@bokamoso.net'
Subject: LINKSFIELD:
Attachments: image001.jpg

^R
RE: CEMETIES IN THE RIETFontein HOSPITAL GROUNDS NOW CALLED THE SIZWE HOSPITAL:

Good day Naomi,

Our e-mails dated from the 29th August 2014 still refer. Kindly provide us with the clear evidence of the source you made use of to compile the map you attached to your e-mail of the 21st August 2014. Also kindly provide us with anything you have in writing from the people that you interviewed. Any prove of your interviews.

As you have the contact details of MS Elizma van Staden, the ex-CEO of the Sizwe Hospital, as you mentioned that you had an interview with her, it would be much appreciated if you can forward those to us. (Your e-mail of the 29th August 2014).

Please confirm receipt of this e-mail.

Kind regards,

Loura du Toit (on behalf of Anè Agenbacht - Senior F&D/ Manager)
Personal Assistant to Anè Agenbacht



T: (+27)12 346 3810 | F: (+27) 86 570 5659 | E: lizellen@mweb.co.za | www.bokamoso.biz
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Marolana 0161

Loura

From: Loura <user9@bokamoso.net>
Sent: Wednesday, September 03, 2014 11:23 AM
To: rietfonteinheritageationgroup@gmail.com
Cc: 'user1@bokamoso.net'
Subject: LINKSFIELD:
Attachments: image001.jpg

RE: CEMETRIES IN THE RIETFONTEIN HOSPITAL GROUNDS NOW CALLED THE SIZWE HOSPITAL:

Good day Naomi,

Our e-mail of yesterday the 2nd September 2011 refers. It would be much appreciated if you can provide us with the source of the information regarding the compilation of the map you sent us. We also need your proof in writing concerning the interviews with people you contacted: names and contact details if possible.

Also kindly provide us with the contact details of MS Elizma van Staden the ex-ECO of the Sizwe Hospital, as you referred to your interview with her in your e-mail of the 29th August 2014.

KINDLY CONFIRM RECEIPT OF THIS E-MAIL.

Have a good day,

Loura du Toit (on behalf of Anè Agenbacht - Senior JRP/ Manager)
Personal Assistant to Anè Agenbacht



T: (+27)12 346 3610 | F: (+27) 86 570 5659 | E: ljzefies@nwweb.co.za | www.bokamoso.biz
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Marogelana 0161

Loura

From: Loura <user9@bokamoso.net>
Sent: Tuesday, September 02, 2014 9:11 AM
To: rietfonteinheritageaiongroup@gmail.com
Cc: 'user1@bokamoso.net'
Subject: LINKSFIELD:
Attachments: image001.jpg

RE: CEMETRIES IN THE RIETFontein HOSPITAL GROUNDS NOW CALLED Sizwe Hospital:

Good day Naomi,

We still need your evidence in writing of the source you made use of to compile the map you attached to your e-mail of the 21st August 2014. Kindly provide us with anything you have in writing from the people that you interviewed.

Also kindly provide us with the contact details of Elizma van Staden the ex CEO of the Sizwe Hospital, as you referred to your interview with her in your e-mail of the 29th August 2014.

Please confirm receipt of this e-mail.

Kind regards,

Loura du Toit (on behalf of Anè Agenbacht - Senior F&P/ Manager)
Personal Assistant to Anè Agenbacht



NAOM

T: (+27)12 346 3810 | F: (+27) 86 570 5659 | E: lizellen@mweb.co.za | www.bokamoso.biz
38 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

Laura

From: Laura <user9@bokamoso.net>
Sent: Monday, September 01, 2014 2:06 PM
To: rietfonteinheritageaiongroup@gmail.com
Cc: 'user1@bokamoso.net'
Subject: LINKSFIELD;
Attachments: image001.jpg

RE: CEMETRIES IN THE RIETFONTEIN HOSPITAL GROUNDS NOW CALLED SIZWE HOSPITAL:

Good day Naomi,

The letter we received from you on the 21st August still refers. We still need your evidence in writing of the source you made use of to compile the map you attached to your e-mail. Also please provide us with evidence in writing of all the discussions and interviews you had with people to prove the validity to the map and the Information regarding specific gravesites.

Kindly confirm receipt of this e-mail.

Kind regards,

Louise du Toit (on behalf of Anè Agenbacht - Senior L&P Manager)
Personal Assistant to Anè Agenbacht



07/08/2014

Loura

From: Loura <user9@bokamoso.net>
Sent: Friday, August 29, 2014 9:52 AM
To: 'rietfonteinheriteageationgroup@gmail.com'
Cc: 'user1@bokamoso.net'
Subject: CEMETRIES IN RIETFONTEIN HOSPITAL GROUNDS NOW CALLED SIZWE HOSPITAL:
Attachments: image001.jpg

Good day Naomi,

The e-mail we received from you on the 21st August 2014 refers. You referred in your e-mail to the map you attached as **the document** and this is definitely something that we will investigate further, though we need evidence in writing of the source you made use of to compile this map. Do you maybe have anything in writing from the many people you interviewed? This is imperative in order to prove the map's validity.

You also referred to a very important document or report which took you hours to compile. Could you kindly forward the copy of this Report to our Office as our appointed specialists have to investigate these. We are independent Environmental Consultants and need all relevant information to do thorough investigation studies and to complete our Report.

Kindly confirm receipt of this e-mail.

Kind regards,

Loura du Toit (on behalf of Anè Agenbacht – Senior L&P/ Manager)
Personal Assistant to Anè Agenbacht



2/08/2014

User1

From: User1 <user1@bokamoso.net>
Sent: Thursday, August 21, 2014 1:40 PM
To: rietfonteinheritageationgroup@gmail.com
Subject: RE: Cemeteries in Rietfontein grounds (Sizwe)

Hi Naomi

Thank you for the confirmation.

Don't you have anything in writing from the people you interviewed in order to prove the map to be accurate and valid?

Kind regards,

Anè Agenbacht

Senior Environmental Assessment Practitioner / Manager

Tel: 012-346 3810

Cell: 083 533 0420

Email: lizelleg@mweb.co.za (Attention: Anè)



Landscape Architects &
Environmental Consultants

(+27)12 346 3810 | F: (+27) 86 570 5659 | E: lizelleg@mweb.co.za | www.bokamoso.biz
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

From: Bokamoso [mailto:lizelleg@mweb.co.za]
Sent: Thursday, August 21, 2014 1:29 PM
To: user1@bokamoso.net
Subject: FW: Cemeteries in Rietfontein grounds (Sizwe)

From: Sizwe Now [mailto:rietfonteinheritageationgroup@gmail.com]
Sent: 21 August 2014 12:30 PM
To: Bokamoso
Subject: Re: Cemeteries in Rietfontein grounds (Sizwe)

Hi Anè,
The important document is the map.

Regards,
Naomi

On Wed, Aug 20, 2014 at 4:37 PM, Bokamoso <lizelleg@mwweb.co.za> wrote:

Hi Naomi

You are referring to a document "It is a very important document that took many hours to compile, thus kindly confirm the receipt thereof" in your email.

If this document is not specifically a Heritage Impact Study but rather a report could we please have a copy of this document to peruse? We only received the layout map.

Thank you,

Anè Stgenbacht

Senior Environmental Assessment Practitioner / Manager

Tel: 012 346 3810

Cell: 083 533 0420

Email: lizelleg@mwweb.co.za (Attention: Anè)



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36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0181

From: Sizwe Now [<mailto:rietfonteinheritageaiongroup@gmail.com>]

Sent: 20 August 2014 03:19 PM

To: Bokamoso

Subject: Re: Cemeteries in Rietfontein grounds (Sizwe)

Dear Ane,

Kindly specify the scope of the Heritage report you refer to.

Kind Regards,

Naomi Dinur
0824961111

On Wed, Aug 20, 2014 at 2:57 PM, Bokamoso <lizelleg@mweb.co.za> wrote:

Dear Naomi

Thank you for your valuable input and the map which is indicating the location of the cemeteries.

This is definitely something we will investigate further. May I please ask that you forward your Heritage report to us for further investigation purposes as well as a discussion/ investigation with our group of specialists?

Trust you find the above in order.

Kind regards,

Anè Agenbacht

Senior Environmental Assessment Practitioner / Manager

Tel: 012-346 3810

Cell: 083 533 0420

Email: lizelleg@mweb.co.za (Attention: Anè)



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T: (+27)12 346 3810 | F: (+27) 86 570 5659 | E: lizelleg@mweb.co.za | www.bokamoso.biz

36 Lebombo Street, Ashlee Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

From: Sizwe Now [<mailto:rietfonteinheritageactiongroup@gmail.com>]

Sent: 20 August 2014 10:16 AM

To: lizelleg@mweb.co.za

Subject: Cemeteries in Rietfontein grounds (Sizwe)

Dear,

Attached is a map of the area, with the cemeteries we located.

Locating the graveyards included many meetings with senior citizens

who lived on the premisses or worked there etc.

There may be other graveyards we did not locate.

It is a very important document that took many hours to compile,
thus kindly confirm the receipt thereof.

While the developers declared that they are not going to build on top of the graveyards,
It seems that the new suggested development per maps published
is going to desecrate the graveyards as it is on top of the burial grounds.

Kind regards,

Naomi Dinur

Rietfontein Heritage Action Group.



This email is free from viruses and malware because avast! Antivirus protection is active.



This email is free from viruses and malware because avast! Antivirus protection is active.

07/06/2014

Loura

From: Bokamoso <lizelle@mweb.co.za>
Sent: Monday, June 09, 2014 1:54 PM
To: user9@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: LINKSFELD;

From: Naomi Dinur [mailto:naomidinur@gmail.com]
Sent: 09 June 2014 01:43 PM
To: Bokamoso
Subject: Re: LINKSFELD;

The article about the Anthrax outbreak in 1923 in Alexandra, and the people who contracted it and who were buried in Rietfontein, was recorded by Barbara Yudelowitz who's aunt also died from it, and is buried there- this info is apparently at the National archives in Pretoria. B.Y. has a copy but she is in Australia and the material is in storage housed in boxes in Australia.

regards,

Naomi Dinur
0824961111

On 9 Jun 2014 13:37, "Bokamoso" <lizelle@mweb.co.za> wrote:

Good day Naomi,

Thank you for your e-mail of the 6th June 2014. We take note of the amount of sheep which is not 2000 but 20,000. We did not refer to a **report**, but to the **article on anthrax**, you mentioned to Ane a while back. It would be much appreciated if you can forward this article to our company as soon as possible.

Kind regards,

(not Loretta!)

Loura du Toit (on behalf of Ane Agenbacht - Senior F&D/Manager)

Personal Assistant to Ane Agenbacht

07/06/2014

Loura

From: Loura <user9@bokamoso.net>
Sent: Monday, June 09, 2014 1:37 PM
To: naomidinur@gmail.com
Subject: LINKSFIELD:
Attachments: image001.jpg

Good day Naomi,

Thank you for your e-mail of the 6th June 2014. We take note of the amount of sheep which is not 2000 but 20,000. We did not refer to a **report**, but to the article on anthrax, you mentioned to Ane a while back. It would be much appreciated if you can forward this article to our company as soon as possible.

Kind regards,

(not Loretta!)

Loura du Toit (on behalf of Anè Agenbacht - Senior JSP/ Manager)
Personal Assistant to Anè Agenbacht



Loura

21/06/2014

From: Loura <user9@bokamoso.net>
Sent: Monday, June 09, 2014 1:37 PM
To: naomidinur@gmail.com
Subject: LINKSFIELD:
Attachments: image001.jpg

Good day Naomi,

Thank you for your e-mail of the 6th June 2014. We take note of the amount of sheep which is not 2000 but 20,000. We did not refer to a report, but to the article on anthrax, you mentioned to Ane a while back. It would be much appreciated if you can forward this article to our company as soon as possible.

Kind regards,

(not Loretta)

*Loura du Toit (on behalf of Anè Agenbocht - Senior L&D Manager)
Personal Assistant to Anè Agenbocht*



06/06/2014

Loura

From: Bokamoso <lizelle@mweb.co.za>
Sent: Friday, June 06, 2014 2:37 PM
To: user9@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: LINKSFIELD:

From: Naomi Dinur [mailto:naomidinur@gmail.com]
Sent: 06 June 2014 02:26 PM
To: Bokamoso
Subject: Re: LINKSFIELD:

Dear Loretta,
There were 20000 (twenty thousand) sheep, not 2000....
Kindly specify which report you are seeking?
Regards,
Naomi Dinur

On 6 Jun 2014 10:11, "Bokamoso" <lizelle@mweb.co.za> wrote:

Dear Naomi,

Thank you for the information concerning the graves near the nursery school and other information relating to these as well as the other points of interest: the 2000 sheep that had been kept at the Rietfontein hospital at the turn of the century, the dairy farm and the official hospital report in connection with the patients admitted. It would be very much appreciated if you could forward the article you mentioned to Ane, our Project Manager.

We would like to include all information to our DRAFT EIA REPORT, therefore it would be kind of you to forward this article as soon as possible.

Please confirm receipt of this e-mail.

Kind regards,

06/06/2014

Loura

From: Bokamoso <lizelle@mweb.co.za>
Sent: Friday, June 06, 2014 2:37 PM
To: user9@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: LINKSFIELD;
Attachments: image001.jpg

From: Naomi Dinur [mailto:naomidinur@gmail.com]
Sent: 06 June 2014 02:26 PM
To: Bokamoso
Subject: Re: LINKSFIELD:

Dear Loretta,
There were 20000 (twenty thousand) sheep, not 2000....
Kindly specify which report you are seeking?
Regards,
Naomi Dinur

On 6 Jun 2014 10:11, "Bokamoso" <lizelle@mweb.co.za> wrote:

Dear Naomi,

Thank you for the information concerning the graves near the nursery school and other information relating to these as well as the other points of interest: the 2000 sheep that had been kept at the Rietfontein hospital at the turn of the century, the dairy farm and the official hospital report in connection with the patients admitted. It would be very much appreciated if you could forward the article you mentioned to Anc, our Project Manager.

We would like to include all information to our DRAFT EIA REPORT, therefore it would be kind of you to forward this article as soon as possible.

Please confirm receipt of this e-mail.

Kind regards,

06/06/2014

Loura

From: Loura <user9@bokamoso.net>
Sent: Friday, June 06, 2014 10:12 AM
To: 'naomidinur@gmail.com'
Cc: 'user1@bokamoso.net'
Subject: LINKSFIELD:

Dear Naomi,

Thank you for the information concerning the graves near the nursery school and other information relating to these as well as the other points of interest: the 2000 sheep that had been kept at the Rietfontein hospital at the turn of the century, the dairy farm and the official hospital report in connection with the patients admitted. It would be very much appreciated if you could forward the article you mentioned to Ane, our Project Manager.

We would like to include all information to our DRAFT EIA REPORT, therefore it would be kind of you to forward this article as soon as possible.

Please confirm receipt of this e-mail.

Kind regards,

Loura du Toit



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Environmental Consultants

T: (+27)12 346 3810 | F: (+27) 86 570 5859 | E: lizelle@mwweb.co.za | www.bokamoso.biz
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Marocelana 0161

27/05/2014

User1

From: User1 <user1@bokamoso.net>
Sent: Tuesday, May 27, 2014 10:51 AM
To: naomidinur@gmail.com
Subject: RE: Attention Ane-

Dear Naomi

Thank you for the information. May I please ask that you will forward this article through to us?

Kind regards,

Anè Stgenbacht

Senior Environmental Assessment Practitioner / Manager

el: 012-346 3810

Cell: 083 533 0420

Email: lizelleg@mweb.co.za (Attention: Anè)



**Landscape Architects &
Environmental Consultants**

T: (+27)12 346 3810 | F: (+27) 86 570 5859 | E: lizelleg@mweb.co.za | www.bokamoso.biz
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

From: Naomi Dinur [<mailto:naomidinur@gmail.com>]
Sent: 25 May 2014 03:42 PM
To: Bokamoso
Subject: RE: Attention Ane-

New info:

I received a report on one Anthrax dead person in the Rietfontein graveyard (Not Jewish) and one young child (Jewish) who is buried there. According to the source the later is registered in the Chevra Kadisha archives...

Regards,

Naomi Dinur

On 25 May 2014 12:24, "Bokamoso" <lizelleg@mweb.co.za> wrote:

Good day Naomi

Thank you for your email and assistance with the information as provided to us on 20 May 2014.

We will have a look at the links from Derek Walker on the study of four cemeteries at the Hospital.

Kind regards,

Anè Agenbacht

Senior Environmental Assessment Practitioner / Manager

tel: 012-346 3810

Cell: 083 533 0420

Email: lizelleg@mweb.co.za (Attention: Anè)



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T: [\(+27\)12 346 3810](tel:+27123463810) | F: [\(+27\) 86 570 5859](tel:+271865705859) | E: lizelleg@mweb.co.za | www.bokamoso.biz

36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

From: Naomi Dinur [<mailto:naomidinur@gmail.com>]
Sent: 20 May 2014 05:43 PM

the 5th graveyard is the lost Jewish graveyard.

Points of interest: (perhaps for Anthrax research) 20000 sheep were kept on the Edenvale hospital grounds at 1900 (Looted by the British from the Boers).

Rietfontein hospital has its own dairy milk farm which made it dairy independently till 1970.

The attached official hospital report page attest that in the year 1908 245 Europeans and 1229 coloured were admitted to the hospital, in the year 1907 251 European and 2216 coloured.

(see end of page).

Naomi Dinur
Mobile: 0824961111

Loura

From: Loura <user9@bokamoso.net>
Sent: Wednesday, September 03, 2014 9:09 AM
To: leentadevilliers@vodamail.co.za
Cc: 'user1@bokamoso.net'
Subject: LINKSFIELD:
Attachments: image001.jpg

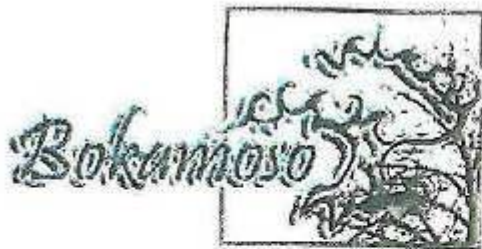
RE: THE ESTABLISHMENT OF THE LINKSFIELD MIXED USE TOWNSHIP:

Goeie dag Mnr de Villiers,

Dr Johan van der Waals sal jou **Donderdag 10h00 by jou kwekery** in Linksfeld ontmoet. Dr Johan is 'n Grondspesialis.
Vogmaals baie dankie vir jou bereidheid om hom te woord te staan.

Lekker dag,

Loura du Toit (on behalf of Anè Agenbacht - Senior L&P Manager)
Personal Assistant to Anè Agenbacht



T: (+27)12 346 3010 | F: (+27) 86 570 5656 | E: lizellen@mwsb.co.za | www.bokamoso.biz
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Marbelane 0101

29/08/2014

Loura

From: Loura <user9@bokamoso.net>
Sent: Friday, August 29, 2014 11:05 AM
To: leentadevilliers@vodamail.co.za
Cc: 'user1@bokamoso.net'
Subject: LINKSFIELD: OU RIETFontein Hospitaal, Tans Sizwe Hospital
Attachments: image001.jpg

Goeie dag Mnr de Villiers,

Ons vorige skrywe aan jou verwys. Aangesien ons onafhanklike Omgewingskonsultante is, is dit van dringende belang dat van ons hoogs professionele spesialiste wat aangestel is om die omgewings en historiese impakstudies saam met ons te doen, die geleentheid kry om saam met jou, wat eerstehandse kennis het van bogenoemde terrein, laasgenoemde te kan besoek.

Dit sal opreg waardeur word indien jy datums van so 'n vergadering en besoek aan die terrein, wat jou sal pas aan ons kan deurstuur. Erken asb ontvangs van hierdie e-pos en of jy wel bereid is om van die spesialiste te woord te staan.

Vriendelike groete,

Loura du Toit (on behalf of Anè Agenbacht - Senior F&E Manager)
Personal Assistant to Anè Agenbacht



EBEN DE VILLIERS

Loura

From: Bokamoso <lizelle@mweb.co.za>
Sent: Tuesday, September 02, 2014 12:33 PM
To: user9@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: LINKSFIELD:

From: Leenta De Villiers [mailto:leentadevilliers@vodamail.co.za]
Sent: 02 September 2014 12:28 PM
To: 'Bokamoso'
Subject: RE: LINKSFIELD:

Goeie Dag

LINKSFIELD ONTWIKKELING – INPAKSTUDIE

Ons sal u graag te woord staan enige weksdag vanag Dinsdag tot Vrydag vanaf 10h00 tot 14h00. Stel my vroegtydig in kennis op watter datum u besluit het sodat ek nie enige ander reekings vir die spesifieke dag tref nie.

Groete,

Eben De Villiers
Cell : 082 895 0889
E-mail : leentadevilliers@vodamail.co.za

From: Bokamoso [mailto:lizelle@mweb.co.za]
Sent: Tuesday, September 02, 2014 10:53 AM
To: leentadevilliers@vodamail.co.za
Cc: user1@bokamoso.net
Subject: LINKSFIELD:

.E: LINKSFIELD: OU RIETFontein Hospitaal, Tans Sizwe Hospital:

Goeie dag Mnr. De Villiers,

Ons skrywe van die 29st Augustus 2014 verwys. Hierin versoek ons jou om ons die geleentheid te bied om saam met die spesialiste wat aangestel is om die omgewings-en historiese faktore en impakstudies saam met ons doen, te woord te staan.

Dit sal waardeer word indien jy datums wat jou die beste sal pas aan ons deurgee, sodat ons so 'n vergadering kan bele. Erken asb ontvangs van hierdie e-pos en of jy bereid is om die spesialiste te woord te staan, aangesien jy eerstehandse kennis het van bogenoemde terrein.

Vriendelike groete,

Loura

From: Bokamoso <lizelle@web.co.za>
Sent: Tuesday, September 02, 2014 12:33 PM
To: user9@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: LINKSFIELD:

From: Leenta De Villiers [mailto:leentadevilliers@vodamail.co.za]
Sent: 02 September 2014 12:28 PM
To: 'Bokamoso'
Subject: RE: LINKSFIELD:

Goeie Dag

LINKSFIELD ONTWIKKELING – INPAKSTUDIE

Ons sal u graag te woord staan enige weksdag vanag Dinadag tot Vrydag vanaf 10h00 tot 14h00. Stel my vroegtydig in kennis op watter datum u besluit het sodat ek nie enige ander reellings vir die spesifieke dag tref nie.

Groete,

Eben De Villiers

Cell : 082 895 0889
E-mail : leentadevilliers@vodamail.co.za

From: Bokamoso [mailto:lizelle@web.co.za]
Sent: Tuesday, September 02, 2014 10:53 AM
To: leentadevilliers@vodamail.co.za
Cc: user1@bokamoso.net
Subject: LINKSFIELD:

RE: LINKSFIELD: OU RIETFontein HOSPITAAL, TANS SIZWE HOSPITAL:

Goeie dag Mnr. De Villiers,

Ons skrywe van die 29st Augustus 2014 verwys. Hierin versoek ons jou om ons die geleentheid te bied om saam met die spesialiste wat aangestel is om die omgewings-en historiese faktore en impakstudies saam met ons doen, te woord te staan.

Dit sal waardeer word indien jy datums wat jou die beste sal pas aan ons deurgee, sodat ons so 'n vergadering kan bele. Erken asb ontvangs van hierdie e-pos en of jy bereid is om die spesialiste te woord te staan, aangesien jy eerstehandse kennis het van bogenoemde terrein.

Vriendelike groete,

Loura

From: Loura <user9@bokamoso.net>
Sent: Tuesday, September 02, 2014 10:53 AM
To: leentadevilliers@vodamail.co.za
Cc: 'user1@bokamoso.net'
Subject: LINKSFIELD:
Attachments: image001.jpg

RE: LINKSFIELD: OU RIETFontein Hospitaal, Tans Sizwe Hospital:

Goeie dag Mnr. De Villiers,

Ons skrywe van die 29st Augustus 2014 verwys. Hierin versoek ons jou om ons die geleentheid te bied om saam met die spesialiste wat aangestel is om die omgewings- en historiese faktore en impakstudies saam met ons doen, te woord te staan.

Dit sal waardeer word indien jy datums wat jou die beste sal pas aan ons deurgee, sodat ons so 'n vergadering kan bele. Erken asb ontvangs van hierdie e-pos en of jy bereid is om die spesialiste te woord te staan, aangesien jy eerstehandse kennis het van bogenoemde terrein.

Vriendelike groete,

Loura du Toit (on behalf of Anè Agenbacht - Senior L&P Manager)
Personal Assistant to Anè Agenbacht



T: (+27)12 346 3810 | F: (+27) 85 570 5869 | E: lizelleq@nwweb.co.za | www.bokamoso.biz
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0101

Loura

From: Bokamoso <lizelle@web.co.za>
Sent: Monday, June 23, 2014 8:01 AM
To: user9@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: KINKSFIELD AFSpraak:

From: Leenta De Villiers [mailto:leentadevilliers@vodamail.co.za]
Sent: 21 June 2014 04:03 PM
To: 'Bokamoso'
Subject: RE: KINKSFIELD AFSpraak:

Goeie dag Me Du Toit

Die enigste tyd wat ek beskikbaar het volgende week is Maandag vanaf 9h00 tot 16h00, Dinsdag vanaf 13h00 tot 16h00, Woensdag vanaf 9h00 tot 16h00. Donderdag vertrek ons na Namibië tot aan die einde van Julie en sal op die vroegste op 29 Julie 2014 terugwees.

Kontak my vir verdere reëlings.

Groete,

Eben De Villiers
Cell : 082 895 0889
E-mail : leentadevilliers@vodamail.co.za

From: Bokamoso [mailto:lizelle@web.co.za]
Sent: Friday, June 20, 2014 1:52 PM
To: leentadevilliers@vodamail.co.za
Cc: user1@bokamoso.net
Subject: KINKSFIELD AFSpraak:

Goeie dag Mnr de Villiers,

Ons gesprek vanoggend verwys. Ongelukkig kan die grondspesialis en kultuur historiese spesialis nie op kort kennisgewing die voorgestelde afspraak wat vir vroeg volgende week voorgestel is maak nie. Albei het reeds ander afsprake so ook ons Projek bestuurder MS Ane Agenbacht.

Groete,

Loura du Toit (on behalf of Anè Agenbacht – Senior EOP/Manager)
Personal Assistant to Anè Agenbacht

20/06/2014

Loura

From: Loura <user9@bokamoso.net>
Sent: Friday, June 20, 2014 1:52 PM
To: 'leentadevilliers@vodamail.co.za'
Cc: 'user1@bokamoso.net'
Subject: KENKSFELD AFSpraak:
Attachments: image001.jpg

Goeie dag Mnr de Villiers,

Ons gesprek vanoggend verwys. Ongelukkig kan die grondspesialis en kultuur historiese spesialis nie op kort kennisgewing die voorgestelde afspraak wat vir vroeg volgende week voorgestel is maak nie. Albei het reeds ander afspraak so ook ons Projek bestuurder MS Ane Agenbacht.

Groete,

Loura du Toit (on behalf of Anè Agenbacht - Senior J&J Manager)
Personal Assistant to Anè Agenbacht



01 852 9951
012 895 2539

19/06/2014

Loura

From: User1 <user1@bokamoso.net>
Sent: Thursday, June 19, 2014 6:32 PM
To: user9@bokamoso.net
Subject: FW: Linksfield

M 4 W.

Loura

Bel asb. vir my vir Eben van die kwekery by Linksfield. As jy nie meer sy nommer het nie kom haal dit gou by my. Vra asb. vir hom en verwys na my e-pos of hy Vrydag 27 Junie 2014 ons spesialiste kan ontmoet om vir hulle die moontlike posisies van die grafte kan aandui. Hoor ook sommer watter tyd hom sal pas.

Ons moet dan asb. die tyd vir Leonie en Johan deur gee.

Kan ek vra dat jy hierdie vir my sal hanteer.

/ra my asb. as enige iets onduidelik is.

Duisend dankies,

Anè Stgenbacht

Senior Environmental Assessment Practitioner / Manager

Tel: 012-346 3810

Cell: 083 533 0420

Email: lizelleg@mweb.co.za (Attention: Anè)



Landscape Architects &
Environmental Consultants

T: (+27)12 346 3810 | F: (+27) 86 570 5659 | E: lizelleg@mweb.co.za | www.bokamoso.biz
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

From: User1 [mailto:user1@bokamoso.net]
Sent: Wednesday, June 18, 2014 5:31 PM
To: leentadevilliers@vodamail.co.za
Subject: Linksfield

Goeie middag Eben

Sal Vrydag die 27ste Junie 2014 jou pas om die posisies van die ander grafte vir ons kultuur historiese en grond spesialiste uit te wys?

Hoor graag van jou.

Vriendelike groete,

Anè Agenbacht

Senior Environmental Assessment Practitioner / Manager

Tel: 012-346 3810

Cell: 083 533 0420

Email: lizelleg@mweb.co.za (Attention: Anè)



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36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Marolana 0161



This email is free from viruses and malware because [avast! Antivirus](#) protection is active.

Loura

To: leoniembotes@gmail.com; johan@terrasoil.co.za
Cc: user1@bokamoso.net
Subject: LINKSFIELD PROJEK;

Goeie dag,

Die voorlopige afspraak vir die 27e Junie 2014 moet ongelukkig verskuif word aangesien mnr Eben de Villiers net tot Woensdag, 25e Junie 2014 beskikbaar is. Hy vertrek Donderdag 26e Junie 2014 vir 6 weke na Namibie. Hy is dus net Maandag 23e Junie 2014 om 10h00 beskikbaar en dan weer die 24e Junie 2014 ook om 10h00. Is dit dalk moontlik dat een van hierdie datums julle kan pas? Ongelukkig sal dit nie moontlik wees om vir 6 weke te wag nie.

Dit sal gaaf wees indien ons so gou as moontlik terugvoering i.v.m. hierdie datums kan kry.

Lekker dag,

Loura du Toit (on behalf of Anè Agenbacht - Senior E&P/Manager)
Personal Assistant to Anè Agenbacht



16/06/2014

User1

From: User1 <user1@bokamoso.net>
Sent: Wednesday, June 18, 2014 5:31 PM
To: leentadevilliers@vodamail.co.za
Subject: Linksfield

Goeie middag Eben

Sal Vrydag die 27ste Junie 2014 jou pas om die posisies van die ander grafte vir ons kultuur historiese en grond spesialiste uit te wys?

Hoor graag van jou.

Vriendelike groete,

Anè Agenbacht

Senior Environmental Assessment Practitioner / Manager

Tel: 012-346 3810

Cell: 083 533 0420

Email: lizelleg@mweb.co.za (Attention: Anè)



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Environmental Consultants

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36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

27/05/2014

User1

From: User1 <user1@bokamoso.net>
Sent: Tuesday, May 27, 2014 11:14 AM
To: 'leentadevilliers@vodamail.co.za'
Subject: Linksfield
Attachments: Linksfield google map.jpg; Linksfield aerial maps.pdf

Goeie more Eben ✓

Aangeheg vind asb. 'n lug foto van die terrein vir die voorgestelde ontwikkeling. Kan jy asb. soos telefonies bespreek net vir ons 'n aanduiding gee van waar orals grafte gevind was.

Skakel my gerus indien jy enige vrae in die verband het.

Vriendelike groete,

Anè Agenbacht

Senior Environmental Assessment Practitioner / Manager

Tel: 012-346 3810

Cell: 083 533 0420

Email: lizelleg@mweb.co.za (Attention: Anè)

Bel Eben



Landscape Architects &
Environmental Consultants

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36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

Juanita

From: Bokamoso <lizelle@web.co.za>
Sent: 23 June 2014 08:00 AM
To: user3@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: RIET FONTEIN

BARBA
YUDELO

From: Barbara M Feinberg [<mailto:glassfoam@live.com.au>]
Sent: 21 June 2014 11:32 PM
To: Bokamoso
Subject: RIET FONTEIN

RE: RIET FONTEIN - BARBARA YUDELOWITZ

You obviously close ears and eyes.... you have infuriated me after I wrote to you and gave you certain information. Do you really think I was going to disclose any data to you. I have dealt with people like you in the past with Rietfontein.

You are either playing a double agenda or just too darn lazy to do the research work yourself. I do not owe you or Naomi Dinur any loyalties.

I will not allow Rietfontein to fall but will not supply either of you any data but will defend as you have made me angry.

I will oppose any ludicrous information of yours through my own means.

I demand you supply concrete proof of the supposed fire at Rietfontein that supposedly destroyed records. This destruction of records through a fire as this is clearly a cover up to more serious issues of deceptions, than you realise. Disease and Anthrax are not the only ghosts of the historical past of Rietfontein. Your remarks have fired new horizons.

Barbara Yudelowitz

INFORMATION URGENTLY
REQUIRED REGARDING
ALLEGED ANIMAL AND
HUMAN BURIAL SITES ON
A PART OF REMAINING
EXTENT OF PORTION 1 ON
THE FARM RIETfontein 61
IN ISIZWE TROPICAL
DISEASE HOSPITAL SITE -
FORMALLY KNOWN AS
THE RIETfontein
HOSPITAL)

[illegible][illegible]

13/06/2014

Loura

From: Loura <user9@bokamoso.net>
Sent: Friday, June 13, 2014 10:06 AM
To: 'brashka1950@hotmail.com'
Cc: 'user1@bokamoso.net'
Subject: LINKSFIELD;
Attachments: Image001.jpg

BR

Good day Brashka,

We would like to thank you for your e-mail sent on the 12th June 2014. As you were the voluntary researcher for Rietfontein for over 10 years, we would appreciate it if you can supply our company with the information you gathered in that time. We are Environmental Consultants appointed to do the impact studies of the area where the Rietfontein Hospital is situated. It is now called the Sizwe Hospital.

Your inputs will be much appreciated especially concerning certain deaths through anthrax and any knowledge concerning grave sites and where they were located. Could you maybe provide us also with any information about what happened to the graves' markers. Had it all been stolen? There is no sign of a Jewish Cemetery. We also contacted the Adler Museum of the Wits University, but they could not provide us with any information. The Sizwe Hospital has no records in connection with the grave sites and their location. Proof of your knowledge will be appreciated.

You mentioned Barbara Yudelowitz in your e-mail. Could you maybe provide us with her e-mail address and other contact details? Please confirm receipt of this e-mail. You are welcome to communicate to our Project Manager Ms Ane Agenbacht at any time: cell phone: 083 533 0420.

Kind regards,

Loura du Toit (on behalf of Ane Agenbacht - Senior L&E Manager)
Personal Assistant to Ane Agenbacht



User1

From: Bokamoso <lizelle@mweb.co.za>
Sent: Thursday, June 12, 2014 10:23 AM
To: user1@bokamoso.net
Subject: FW: Linksfeld

From: Brashka Artist [mailto:brashka1950@hotmail.com]
Sent: 12 June 2014 09:31 AM
To: <lizelle@mweb.co.za>
Subject: Re: Linksfeld

Hi Elsa, Are you in touch with Naomi Dinur who is fighting the Rietfontein Hospital cause. I was the voluntary researcher for Rietfontein for over 10 years and she has been in touch with me constantly for information and then sent you a letter to say I was dead. I am very upset about this as I am alive. Thank you Barbara yudelowitz. I also have proof of anthrax deaths at Rietfontein.

Sent from my iPhone

On 12/06/2014, at 3:14 PM, "Bokamoso" <lizelle@mweb.co.za> wrote:

Dear client,

Ané Agenbacht from Bokamoso asked me to forward your e-mails to her. Unfortunately I did not receive the e-mails.
Would you be so kind please....to resend.

Greets / Regards,

Elsa Viviers

<image001.jpg>
Landscape Architects &
Environmental Consultants cc.

T: (+27)12 346 3810 | F: (+27) 86 570 5659 | E: lizelle@mweb.co.za | www.b.bokamoso.biz
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a world class African city

City of Johannesburg
Environmental, Infrastructure and Services Department

118 Jonsson Street
Traduza House
Braamfontein

PO Box 1048
Johannesburg
2000

Tel 011 687 4236
Fax 086 627 7516

www.joburg.org.za

UNIT : IMPACT MANAGEMENT AND COMPLIANCE MONITORING

INTERNAL MEMO

TO : Ben Pretorius

FROM : Tshilidzi Tshimange

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

YOUR REF : 08-14212

Signature

DATE : 21 July 2014

Date

[Handwritten signature]
21/07/2014

APPLICATION: TOWNSHIP ESTABLISHMENT

PROPERTY DESCRIPTION: SUNNINGDALE EXTENSION 20

The application is for the establishment of a mixed use development.

We have examined this application in terms of the following environmental criteria:

- Location
- Surrounding land uses
- Proximity to conservation areas and areas of ecological importance.
- Alignment to environmental standards, legislation and policies including
 - National Environment Management Act (Act 107 of 1998) as amended (NEMA) and Environmental Impact Assessment Regulations, 2010
 - City of Johannesburg Catchment Management Policy, 2008
 - Johannesburg Metropolitan Open Space Systems, 2008
- City of Johannesburg GIS layers including Wetland Audits, Streams and Rivers, 1:100 year floodlines, and Biodiversity Sector Plan.
- City of Johannesburg GIS layers including Wetland Audits, Streams and Rivers, 1:100 year floodlines, and Biodiversity Sector Plan; and
- The reviewed Final Scoping Report (also included in the application).

General findings (Sunningdale Extensions 13 – 20 / Linksfield Mixed Use Inclusionary Development):

- The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures among others on Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.
- The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital that specializes in the treatment of Tuberculosis, HIV testing and counselling

and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation.

- The subject property is zoned "Agricultural" subject to conditions stated on Page 21 of the Final Scoping Report attached in this application as Annexure J.
- In terms of the City of Johannesburg GIS layers the site is affected by Channelled Valley Bottom Wetlands, the Jukskei River and its tributaries, 1:100 year floodlines and Critical Biodiversity Areas. This has been confirmed in the application.
- The major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 1 (CBA1), and some lesser portions being classified as Critical Biodiversity Area 2 (CBA 2).
- The site is within Wetland Management Zone 1 as identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection.
- It is reported that individuals and animals that died of anthrax and other contagious diseases are buried on site.
- Instead of the preferred Strategic Environmental Assessment, the Environmental Impact Assessment process has been initiated and this Department has commented on the Final Scoping Report on the 24th of April 2014 (attached as Annexure J: Final Scoping Report in the application). The Departments comments are attached here as **Annexure A** for your ease of reference.

Comments made by the Department include the following:

- The Health Assessment and Risk Study must be conducted. It must include the location of identified graves, causes of death and expert opinion on soil and/or groundwater contamination including buffer requirements.
- The proposal to relocate Sizwe Hospital to Edenvale Hospital must be explored further. It must be confirmed whether there is a buffer required around the hospital for the current operations due to the nature of illnesses that are treated.
- Other studies including the Fauna and Flora, Wetland Delineation and Geo-hydrological Assessment must be conducted and included in the Environmental Impact Report.

Studies included in the application are as follows:

- Annexure K: Final Report on Phase 1 Geotechnical Site Investigation;
- Annexure L: Bulk Civil Engineering Service Report;
- Annexure M: Bulk Electrical Statement; and
- Annexure N: Traffic Impact Assessment.

- The 'Developmental Precincts' identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the open space must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways. The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City.
- The application has identified two strategies for stormwater management including attenuation of accumulated stormwater in the Jukskei River, and attenuation of stormwater before draining into Jukskei River (Annexure L). While it is regarded as entirely premature to be discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are NOT supported by this Department and are **STRONGLY OPPOSED**. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer

Signature

Date

21-07-2014

- It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environment, Infrastructure Services Department (see Annexure B for details).
- The application makes reference to the provision and upgrading of associated infrastructures such as sewage line, water supply, and electricity supply including a substation and roads among others. These activities are likely to pose detrimental environmental impacts on the receiving environment; therefore, they need to be assessed thoroughly in the Environmental Impact Assessment Report.
- The Greater Linksfield Mixed Inclusionary Development has been divided into eight townships and this Department has received all eight separate Township Establishment applications (Sunningdale Extension 13 – 20) for comments.

Specific findings (Sunningdale Extension 20):

- Sunningdale Extension 20 is proposed to have six erven where two erven measuring 7.99 ha will be zoned "Special" (for dwelling houses block or blocks of flats (at a maximum density of 160u/Ha), residential buildings, institutional uses, educational uses, shops, offices, place of public worship, place of amusement, showrooms, motor related and commercial, public street, private open space including such supportive uses, two erven measuring 19.41 ha will be zoned "Institutional" (for institutions, place of public worship, place of instruction, dwelling houses, special buildings, social halls, retail, shops, place of refreshments, and residential buildings for students type housing), one erf measuring 0.42 ha will be zoned "Private Open Space" for a cemetery and two erven will be zoned "Private Open Space" for a park (12.89 ha). There will also be "Public Streets".
This township occupies the central portion of the greater development and measures 49.18ha in extent.
Erf 31 of the proposed development is affected by the 1:100 year floodline and wetland associated to the Jukskei River and its tributary and will be used as a park.
Three pedestrian bridges are indicated on the layout map (Annexure P).
The proposed layout plan (Annexure O and P) indicates that the 30m buffer required in terms of the City of Johannesburg Catchment Management Policy has been calculated from the wetland layer instead of the 1:100 year floodline. The proposed layout assumes the standard wetland or riparian zone buffers of 30 m. In the absence of detailed Fauna and Flora studies, it is not possible to determine the final width of the buffers, which may require to be increased on the basis of biodiversity issues. Critical drainage pressures in the sub region may also warrant the imposition of increased riparian buffers for hydrological protection. The Health Assessment and Risk Study will also determine whether any buffers are required around the hospital and the cemetery.
- There are 'rocky' areas within the property. The Fauna and Flora study to be done as part of the EIA Study must indicate what 'rocky' means with respect to environmental sensitivities. The Bulk Civil Engineering Services Report or relevant study must indicate whether blasting will be required and impact must be addressed in the EIA.
- The Geotechnical survey classifies the site as zone 1 and 2. A summary of the Geotechnical zones has been given on the attached draft layout plan: SUNNING_20LayD2014.03.13.
- Erf 20 Sunningdale Extension 20, is a cemeteries which is likely to be covering bodies that died of contagious diseases.

Comments:

Having considered the above factors it is evident that the proposed development has numerous detrimental impacts that will affect the receiving environment. Since the EIA process is underway. The outcome of the Specialist Studies, some of which have not yet been compiled considered, may have spatial implications for the proposal. The Department objects to the


application and is of the opinion that this application must be pended until the EIA process is finalised.

Other comments:

- In terms of City of Johannesburg Catchment Management Policy no development activity will be supported within the 30m buffer of the delineated wetland and certified 1:100 year floodline, whichever is the greatest. Therefore, the layout plan needs to be amended in line with this.
- All the areas within the 30m buffer of the delineated wetland and certified 1:100 year floodline, whichever is the greatest must be zoned Public Open Space. The purpose of these areas is conservation and not recreational. The areas are also linked to a wider open space system which is zoned public open space to the north and south of the property. Current and future climate change considerations require that open spaces be provided to serve for uses including biodiversity and flood protection.
- All proposed infrastructure must be designed to be resilient to climate change considerations. This includes the design of bridges to facilitate water flow and the relocation of sewers pipes, where upgrades to larger pipes are proposed, to outside the 1:100 year floodline and delineated wetland.
- In addition to conservation and protection of sensitive natural open space areas, provision would need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of this Department. No public open space contributions will be accepted in lieu of parkland
- The Open Space Framework proposes that a standard of 2,4 ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open spaces such as protected areas high sensitivity vegetation and ridges or wetlands and associated buffers.
- This Department does not support multiple crossing of water bodies. There is a great need to revise the layout plan to accommodate this concern.
- The outcomes of all the Specialist Studies proposed in the Final Scoping Report must be used to generate a composite sensitivity map that will inform the layout plan of the proposed township. Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment (not yet compiled and considered in the current layout) and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003).
- All services related specialist studies/reports must be included and evaluated in the EIA report. The EIA must also show all existing servitudes/services and proposed upgrades including servitudes and confirm whether all listed activities have been applied for.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.

Should you have any queries or require any further information, please do not hesitate to contact me.

Yours sincerely, **City Of Joburg**
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature 
Date 21/07/2014

Lebo Molefe

Acting Unit Head: Impact Management and Compliance Monitoring

Tel: 011 587 4205

Fax: 086 627 7516

ANNEXURE A

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature [Signature]
Date 21/07/2014

ANNEXURE B



a world class African city

City of Johannesburg
Environment, Infrastructure and Services Department

118 Jonsson Street
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Braamfontein

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South Africa
2000

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www.joburg.org.za

Our Ref: TT/EIM/14/02/2014
Contact: Tshilidzi Tshimange
CoJ Region: E
Tel: 011 587 4236
Fax: 086 627 7516
Date: 25/04/2014

Lizelle Gregory
Bokamoso Landscape Architects and Environmental Consultants
P.O.Box 11375
Maroelana
0161

Lizelleg@mweb.co.za

Dear Madam

SCOPING REPORT FOR THE PROPOSED MIXED USE DEVELOPMENT ON PORTIONS 87, 148, 149 AND THE REMAINDER OF PORTION 1 OF THE FARM RIETPONTHEIN 61-IR: GAUT: 002/13-14/ED153

The Draft and Final Scoping Reports dated December 2013 and February 2014 received from Bokamoso Landscape Architects and Environmental Consultants has reference.

Description of the project

The application is for the Environmental Authorisation from the Gauteng Department of Agriculture and Rural Development in accordance with NEMA EIA Regulations, 2010. The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures on Portions 87, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.

The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital and specializes in the treatment of Tuberculosis, HIV testing and counselling and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation. The subject property is zoned "Agricultural" subject to conditions stated on page 21 of the Scoping Report.

Guidelines, By-laws, Precinct Plans, Policies and Environmental Management Frameworks:

In terms of EIA Regulations, 2010, the proposed activity is listed in all three listing notices and requires Environmental Authorisation prior to the commencement. Fully fledged EIA is required for this kind of development.

The Sub Area 28 of the 2010-2011 Region E RSDF is a large, relatively underutilised Sub Area and is one of the last remaining open tracts in the City of Johannesburg. It is the location of critical public health institutions. It aims amongst other things to reinforce this area as an institutional node focusing on the medical field and to promote residential development, particularly low income residential development.

Although the RSDF promotes the development of this area, it also appeals for the protection of the sensitive environmental attributes such as the Jukskei River and its tributaries as well as the associated wetlands and floodlines.

Description of alternatives

The submitted Draft and Final Scoping Reports has identified adequate alternatives for executing the proposed activity. These include the No-Go, Land Use, Services, Locality and Layout alternatives. However, section 6 of the Scoping Report has prematurely ruled off some identified alternatives without assessing them i.e. section 6.2.2: Residential development.

Description and assessment of the identified environmental issues

The submitted report in Section 10 and the attached plan of study has identified and assessed a number of environmental issues including but not limited to biophysical and socio-economic impacts of the proposed development during construction and operational phases. The methodology for assessing the identified issues has been outlined in the report and is satisfactory.

Geology and Soils

The site is underlain by mafic and granitic rocks and it is not underlain by dolomitic bedrock. Stability investigation of the site is not necessary. The soils of the site pose geotechnical constraints that warrant precautionary foundation measures due to the following:

- Collapsible soil horizons in the residual granitic soil
- Perched water tables that may form on the bedrock and pedogenic horizon interface with the overlying soils with possible surface seepage zones on the lower slopes and next to the drainage channels
- Difficult excavation conditions due to shallow bedrock
- Higher runoff and surface ponding due to low infiltration

The detailed Geotechnical report will be compiled and submitted with comments from the Council of Geosciences as part of the EIR. The Geotechnical engineer will confirm the presence of hazardous waste covered under the ground, if any.

Hydrology

The proposed site is affected by both 1:50 and 1:100 year floodlines. The Jukskei River floodplain and its tributaries as well as valley bottom wetland systems flows or occur on the site. The channels of both the Jukskei River and its tributaries are significantly degraded due to increased stormwater runoff, historical agricultural activities, historical infrastructure development, and failed human interventions in controlling erosion. Significant engineering intervention is required to stabilise the banks.

Two small wetlands identified on site are said to be disturbed but they can be rehabilitated and kept as open spaces. Therefore, detailed wetland delineation, assessment and protection measures as well as stormwater management plan must be submitted with the EIR. This will help to alleviate possible adverse impacts on the integrity and sustainability of the wetlands.

Topography

The natural drainage system will have to transfer the arrival of additional stormwater faster. The change in development hydrology and stormwater attenuation is essential in order to offset the

potential unfavourable impacts of post development. The topographical characteristics have a negative effect on the development potential of the site. The stormwater management plan must take cognizance of the topography of the site.

Climate

Wet summer conditions may make construction and environmental rehabilitation very difficult whereas dry and windy conditions may exacerbate dust pollution. Climatic conditions need to be taken into consideration when scheduling construction works on site.

Fauna and Flora

The site is ecologically sensitive since it has the primary vegetation, rivers and wetland accommodating Red listed mammals, Red listed plants, Orange listed plants, invertebrates and birds. The proposed activity is likely to have adverse detrimental impacts on biodiversity and ecosystems on site and off site as well. Therefore, a detailed Fauna and Flora survey, including a specialist biodiversity studies, will be done and reports submitted as part of the EIR.

Heritage

Buildings and infrastructure representing all periods from 1890 to modern times forming part of the Hospital Complex occur on site. Three cemetery sites were identified and the possibility of more burial sites or graves is still to be investigated. The relocation of Sizwe Hospital is a concern. A full heritage report must be submitted as part of the EIR where the comments from SAHRA must be addressed.

Land pollution and Infectious Diseases

The site is general a vacant open space perceived to be contaminated due to the excessive dumping of rubbish and potential hazardous waste related to the cemeteries on site. The various graves are associated with the Sizwe Hospital established to treat infectious diseases. Those who died of these infections were buried on this site. It is reported that animals that died of anthrax were also buried on the site. It is crucial to conduct a detailed assessment of the site to establish the location of the graves and their treatment. There is also a need to conduct a detailed soil and water analysis to determine the presence of spore/ pathogens/ viruses and the threat/ risk to humans during construction and occupation. The outcomes of these studies must be included in the EIR.

Agricultural Potential

The agricultural potential of the site ranges from high to very low. The proposed development is likely to take away soils with high potential for agricultural productivity. In this regard the applicant may consider conducting a thorough agricultural potential of the land in order to incorporate agricultural activities into the proposal such that food security and food safety in the region can be attained at the same time.

Land use

Although the site is located in an area characterized as residential area with many complimentary business operations, it is mostly vacant and undeveloped with the exception of approximately 25ha occupied by the hospital complex, cemeteries and personnel accommodation. The proposed activity includes among others the residential, retail, offices, light industrial, educational, medical facilities, hotels and conference facilities. A needs assessment and economic impact assessment will be conducted and the report attached to the EIR.

Visual Impact

The proposed activity is likely to have adverse visual impact since and therefore lead to the loss of "sense of place". A detailed visual impact assessment must be conducted and mitigation measures supplied during EIA. Architectural guidelines must be based on the mitigation measures. Cultural and historical features that contribute to the "sense of place" must be identified. Aesthetic areas must be identified. The reports must be attached to the EIR.

Noise Impact

The development is likely to have adverse noise impact on the surrounding residents. Therefore, noise impact assessment must be conducted in order to come up with mitigation measures. The report and mitigation measures should be submitted with the EIR.

Light pollution

Street and security lighting may have negative impacts on the eyes of the oncoming traffic and residents if not properly installed. Mitigation measures must be investigated during EIA process and included in the EIR.

Air quality

Atmospheric pollution is likely to occur during construction phase, especially due dust and infectious diseases. Dust suppression techniques such as sprinkling the construction site regularly water and dust nets may mitigate the impacts to the ambient levels.

Demography

Population statistics are very crucial to ascertain the need and viability of a development of this magnitude. Motivations in this regard will be attached to the EIR.

Bulk services

Upgrades and new water and sewer infrastructure would be required to service the proposed development. The combination of Bruma outfall and the diversion of Iliondale pump station to the Modderfontein outfall will provide sufficient capacity. Where the pipelines cross water courses, appropriate licenses will be sought. Detailed assessment and recommendations for adequate services must be included in the EIA report.

Stormwater has a significant influence on site development methodology. A Stormwater Master Plan has been compiled. Detention facilities are proposed to be utilized during design storm occurrences in order to contribute to the ecological wellbeing of the riverine systems. All external stormwater pipes and channels must be indicated on the plans. Details of the properties that would be affected by the Stormwater Management Plan must be provided including the servitudes to be registered.

The existing underground and overhead bulk electricity network would supply the required electricity to this development. Johannesburg City Power has indicated that there should be enough capacity from the underground network even though there might be a need to supply from several 11kV circuits which are yet to be identified. The developer may be required to construct a switching station in line with Johannesburg City Power's specifications and standards. The position of the switching station is yet to be finalized. Details of the properties that would be affected by the proposed electricity upgrad must be provided including the servitudes to be registered.

The alternative energy sources such as gas, solar water heating and solar energy for streets and area lighting would be used in the proposed development. Gas will be supplied from the Egoli Gas High Pressure Pump Station at 5 Edward Avenue in Sandringham and its alignment will follow existing roads to the edge of the development site.

The waste management aspect is not clear in terms of who will remove what kind waste and dispose them off where and how? Therefore, a confirmation on who will handle domestic and industrial waste must be provided in the EIR. Details of relevant landfill sites where the waste will be disposed must be provided as well as the capacity confirmation.

Traffic

The proposed development is in close proximity to the airports, rail, bus rapid transit and freeways. Major roads around the site will be upgraded and other roads are proposed within the development. The site is accessible through the N3/Linksfield Road interchange and

N3/Modderfontein Road interchange. The entire transportation and traffic impact investigation must be included in the EIA report.

Public Participation Process

This process is very crucial in the EIA process. The public will be given another opportunity to raise their views about the proposed activity during EIA phase. The issues and comments raised will be included in the EIR.

Recommendations

This Department is of the opinion that, looking at the nature and magnitude of this activity and associated impacts on the surrounding ecological and socio-economic environment, the following issues must be addressed in the Environmental Impact Assessment Report:

- The identified alternatives must be assessed comparatively in order to come up with the best suitable alternatives (proposals) and mitigation measures that are project and site specific.
- Specialist studies to determine the locality, extent and proper management of the sensitive environmental features as per the discussion above must be conducted as stipulated in the Draft and Final Scoping Reports' Section 10 and accompanying Plan of Study (Annexure D). These are necessary in order to minimize adverse impacts on the environment and to ensure that the natural environment is adequately streamlined into the proposed development and the benefits thereof are fully realized.
- Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003).
- The Draft and Final Scoping Reports on page 2 indicated the possibility of the occurrence of graves on site where people and/or animals that died from infectious diseases were buried. A detailed investigation into this (health assessment and risk study) must be conducted by a suitably qualified specialist. The Department of Health (at all spheres of government including the medical institutions in the surrounding area), and Johannesburg City Parks must be given an opportunity to comment on this report prior to the submission of the EIA report.
- In the process of engaging the Department of Health and the medical facilities in the area, there are crucial issues that must be addressed. Those issues include the type of treatment offered, risks, buffers required, and the relocation of Sizwe Hospital among others.
- The Health Assessment and Risk study must include but not only limited to the location of grave, number of graves, list of causes of death, indication on whether humans or animals are buried in such grave, compatible land uses, expert opinion on soil and/or ground water contamination including buffer requirements. The results of the study must be reviewed independently.
- Upon completion of the studies, a composite sensitivity map overlaid with the proposed development land uses must also be submitted with the EIA report. The map must be legible.
- All the issues raised by the interested and/or affected parties must be considered and addressed, including the issue of the alternative that was proposed a number of years back for the property to be used for a 'medical park.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.
- The layout plan must further avoid the roads that cross the sensitive areas.
- All services reports must be included and evaluated in the EIA report.

Should you have any queries or require any further information, please do not hesitate to contact the Department.

Kind regards.



Linda Kuhn

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INTERNAL MEMO

TO : Mr T Tshimange

CC : Mr L Nevuthali

FROM : Jane Eagle

YOUR REF : PROPOSED SUNNINGDALE EXT 18

DATE : 25 June 2014

Reference is made to the application for the establishment of a township – proposed Sunningdale Ext 18 on a part of Rem of Portion 1, Ptn 137, Ptn 138 and Ptn 149 Rietfontein 61 IR. It is further understood that this is but one of a number of townships making up what is referred to by the applicant as the Linksfield Mixed Use Inclusionary Development comprising 8 proposed townships, proposed Extensions 13 to 20, amongst others, Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR, measuring approximately 271,57 ha. The proposed actual development area measures approximately 194,99 ha in extent. The property is zoned "Agricultural" subject to conditions.

General:

In regard to the proposed township application, there are a number of procedural aspects which are of concern and need to be addressed.

Firstly, for a site of such environmental sensitivity, it is unacceptable and premature for the township establishment process to be so far advanced and comments sought prior to the completion of critical environmental studies as part of an Environmental Impact Assessment. In the absence of certain essential specialist environmental studies, any comments from an environmental perspective can only be limited and based on general site attributes. This is contrary to the spirit of NEMA which holds all decision making authorities and regulators accountable to consideration of NEMA principles in their decision making processes. It is regarded as entirely premature to be requested to provide comments on the town planning application when certain critical environmental specialist studies have not been completed.

In our view the application remains incomplete without the availability of the specialist studies, and cannot be properly assessed from an environmental perspective.

Secondly, it is questionable why the development is being considered as a number of discrete townships, rather than on a holistic basis for an integrated development. The environmental sensitivities and importance of the overall site comprising all proposed townships, as highlighted below, underscore the need for any development proposals to be considered in an integral manner, taking cognizance of the total site proposed for development, and of the development framework for the larger site as a whole. The correct process for consideration of a site of this sensitivity and extent would be a Strategic Environmental Assessment. This should ideally precede any environmental authorization issues.

Biodiversity

Notwithstanding, it should be noted that the major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 1 (CBA1), and some lesser portions being classified as Critical Biodiversity Area 2 (CBA 2).

The applicant's own specialist report confirms the environmental importance and sensitivities of the site.

The layout for the wider site appears to completely disregard these sensitivities or biodiversity aspects in favour of development, with a minimum buffer proposed on a very constrained riparian zone. In the absence of the detailed fauna and flora studies to inform otherwise, important biodiversity sites, in particular those classified as CBAs, should be excluded from the development areas and conserved as environmentally sensitive areas.

Further, the 'Developmental Precincts' identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the open space must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways. The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City. The proposed layout also appears to assume the standard wetland or riparian zone buffers of 30 m. In the absence of detailed fauna and flora studies, it is not possible to determine the final width of the buffers, which may require to be increased on the basis of biodiversity issues. Critical drainage pressures in the sub region may also warrant the imposition of increased riparian buffers for hydrological protection.

Glaringly absent in the motivation memorandum is any acknowledgement of how the proposal in any way serves the needs of the environment or sustainability and biodiversity protection, or the planning objectives of Sub Area 28, in particular the recommended interventions "To Protect the quality and integrity of the environment". While the report has acknowledged this objective, there is nothing in the proposed layout and overall development approach to suggest that anything more than lip service has been paid to this aspiration. It is in fact disingenuous for the report to cite a principle such as "Emphasis will be placed on quality public space, pedestrian environment, public parks and **protection of biodiversity areas** when in **fact the proposed layout implies the large scale loss of areas designated as Critical Biodiversity Areas.**

Biodiversity conservation aspects and ecological linkages are barely acknowledged in the proposed development approach and layout which fails to address a number of findings from the applicant's own specialist findings for the scoping phase, as well as various COJ policies and approved planning tools such as the COJ Wetland Protection and Management Plan, which highlight Modderfontein as having one of the most important wetland systems from a biodiversity perspective. The site now under consideration is a critical link area between open space areas and refuges on Huddle Park, and the greater Modderfontein area. The preliminary assessment undertaken by Bokamoso Landscape Architects and Environmental Consultants underscores the conservation importance of this site, identified a number of environmental sensitivities and conservation features identified as "Irreplaceable" in terms of the Gauteng C Plan, including:

- Habitat for Red listed mammals
- Habitat for Red listed plants
- Orange listed plant habitat
- PPrimary vegetation
- Rivers and wetland
- Invertebrates, and
- Bird Life.

The report further highlights the likely impacts as inter alia

- Loss of sensitive grassland areas
- Possible red data flora and fauna species,
- Sensitive vegetation
- Loss of habitat
- Loss of movement corridor and lack of open space links.

The proposed layout does not appear to have made any attempt to deal with these issues, merely providing for a narrow riparian corridor, most of which is proposed as recreational parks for residents of the proposed development.

The proposed amended layout both appear to overlook these important conservation areas and make provision only for the protection of a narrowly defined, minimum wetland and riparian zone through the development.

Wetland protection and management

Both the original layout and the proposed amended layout do identify wetland areas associated with the watercourses that traverse the site. While the extent of wetlands does not necessarily preclude development on the entire site, the development would have to comply with the provisions of the approved COJ Catchment Management Policy be adhered to i.e. That the riparian zone/wetland and associated buffer zone of 30 metres from the outer edge of the wetland temporary zone be designated as sensitive and no development be permitted within such wetland and buffer zone or within the 1:100 year floodline, whichever is the greatest. In addition, the hydrological linkages and dependencies also need to be properly understood and protected within any development of the site. Given that the valley bottom wetland forms part of a continuous open space system it is required that this area be designated as sensitive and conserved in a manner which protects its ecological functions. As indicated, it is possible that increased buffers may be warranted for the site due to biodiversity, habitat and hydrological imperatives.

Even the applicant's own geotechnical report confirms the expected geotechnical constraints for the sites as being:

- Collapsible soil
- Seasonal shallow groundwater, perched groundwater and surface seepage near the floodplain,
- Moderate erodability of surficial soils and
- Localised difficulty of excavation to 1.5 m depth

Further, the site is within Wetland Management Zone 1 as identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection. In terms of key management concerns for Wetland Management Zone 1, management of sediments and water quality are both identified as key, while pre-emptive engineering is advocated whereby sufficient space is maintained for the systems to adjust with little active intervention to the changes in hydrology or that active engineering is applied so as to ensure that wetland management objectives are met.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Storm Water Management

In regard to the two options proposed for the management of stormwater and drainage associated with the proposed development, while it is regarded as entirely premature to be

discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are **NOT** supported by this unit and are **STRONGLY OPPOSED**. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer, and the following conditions would apply:

A storm water management plan will need to be submitted for the approval by both the Johannesburg Roads Agency and Environmental Management prior to the approval of the final Site Development Plan, and will be required to implement a storm water management scheme to meet the following criteria/standards:

Peak discharge - no increase in discharge for any event of any duration up to the 25 year RI event

Volume of runoff - no increase up to the annual 10 year rainfall

Runoff frequency - no surface runoff for the 1 yr RI event of any duration

Water Quality - no deterioration

Space allocation for storm water management must be indicated on the site development plan, outside of the wetland and wetland buffer areas or any environmentally sensitive areas. NO in-stream attenuation measures will be considered acceptable.

The storm water management plan should in any event minimize the generation of surface runoff and storm water through adopting the principles of Water Sensitive Urban Design (WSUDS) and Sustainable Urban Drainage Systems (SUDS) which provide various options such as bio-retention ponds, enhanced swales and grass lined channels, stone filled infiltration ditches, permeable paving etc. in order to minimize surface runoff and to maintain water quality.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Open Space Provision

In addition to conservation and protection of sensitive natural open space areas, provision would need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of the Environmental Management Department of COJ. No public open space contributions will be accepted in lieu of parkland

The Open Space Framework proposes that a standard of 2,4 ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open spaces such as protected areas high sensitivity vegetation and ridges or wetlands and associated buffers.

Land Use / Zonings

As stated above, it is considered entirely premature to be considering the town planning application prior to the availability of final detailed specialist environmental studies. Notwithstanding, should the principle of development of parts of the site be approved, consideration should be given to the recommendations of the draft Bio Regional Plan for Johannesburg and to the COJ Open Space Framework in regard to those land uses which are

appropriate to areas immediately adjacent to important biodiversity areas or sensitive environmental sites. This should be taken into account in terms of land use, detailed layouts, densities and typologies.

Layout

It is our view that consideration of the township should not be proceeded with until all the necessary detailed environmental specialist studies are available and a sound Strategic Environmental Assessment approach has been followed to inform any development approach for such an environmentally sensitive site which should inform the basic principles of any development approach and ensure that the interests of environmental sustainability and biodiversity protection have been adequately addressed and considered. It is our considered opinion that the current approach of fragmented township applications does not meet the requirements for holistic and sustainable development approach to such a precious site within the City and that the township applications are premature.

In light of the above, this division cannot support the proposed township or associated layout until the concerns and environmental issues highlighted above have been resolved.

Should you require further clarity on any of the above issues, please do not hesitate to contact me.

Regards

Jane Eagle
Assistant Director: Open Space Planning
Environmental Management

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UNIT : IMPACT MANAGEMENT AND COMPLIANCE MONITORING

INTERNAL MEMO

TO : Ben Pretorius

FROM : Tshilidzi Tshimange

YOUR REF : 08-14211

DATE : 21 July 2014

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature: [Signature]
Date: 21/07/2014

APPLICATION: TOWNSHIP ESTABLISHMENT

PROPERTY DESCRIPTION: SUNNINGDALE EXTENSION 19

The application is for the establishment of a mixed use development on a part of Re Portion 1, Portion 137, Portion 138 and Portion 149 Rietfontein 61-IR.

We have examined this application in terms of the following environmental criteria:

- Location;
- Surrounding land uses;
- Proximity to conservation areas and areas of ecological importance;
- Alignment to environmental standards, legislation and policies including
 - National Environment Management Act (Act 107 of 1998) as amended (NEMA) and Environmental Impact Assessment Regulations, 2010
 - City of Johannesburg Catchment Management Policy, 2008
 - Johannesburg Metropolitan Open Space Systems, 2008
- City of Johannesburg GIS layers including Wetland Audits, Streams and Rivers, 1:100 year floodlines, and Biodiversity Sector Plan; and
- The reviewed Final Scoping Report (also included in the application).

General findings (Sunningdale Extensions 13 – 20 / Linksfield Mixed Use Inclusionary Development):

- The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures among others on Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.
- The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital that specializes in the treatment of Tuberculosis, HIV testing and counselling

and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation.

- The subject property is zoned "Agricultural" subject to conditions stated on Page 21 of the Final Scoping Report attached in this application as Annexure J.
- In terms of the City of Johannesburg GIS layers the site is affected by Channelled Valley Bottom Wetlands, the Jukskei River and its tributaries, 1:100 year floodlines and Critical Biodiversity Areas. This has been confirmed in the application.
- The major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 1 (CBA1), and some lesser portions being classified as Critical Biodiversity Area 2 (CBA 2).
- The site is within Wetland Management Zone 1 as identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection.
- It is reported that individuals and animals that died of anthrax and other contagious diseases were buried on site.
- Instead of the preferred Strategic Environmental Assessment, the Environmental Impact Assessment process has been initiated and this Department has commented on the Final Scoping Report on the 24th of April 2014 (attached as Annexure J: Final Scoping Report in the application);

- The Departments comments are attached here as **Annexure A** for your ease of reference. Comments made by the Department include the following:

- The Health Assessment and Risk Study must be conducted. It must include the location of identified graves, causes of death and expert opinion on soil and/or groundwater contamination including buffer requirements.
- The proposal to relocate Sizwe Hospital to Edenvale Hospital must be explored further. It must be confirmed whether there is a buffer required around the hospital for the current operations due to the nature of illnesses that are treated.
- Other studies including the Fauna and Flora, Wetland Delineation and Geo-hydrological Assessment must be conducted and included in the Environmental Impact Report.

Studies included in the application are as follows:

- Annexure K: Final Report on Phase 1 Geotechnical Site Investigation;
- Annexure L: Bulk Civil Engineering Service Report;
- Annexure M: Bulk Electrical Statement; and
- Annexure N: Traffic Impact Assessment.

- The 'Developmental Precincts' identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the open space must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways. The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City.
- The application has identified two strategies for stormwater management including attenuation of accumulated stormwater in the Jukskei River, and attenuation of stormwater before draining into Jukskei River (Annexure L). While it is regarded as entirely premature to be discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are NOT supported by this Department and are **STRONGLY OPPOSED**. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the

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and Services Department
Finance

Signature

Date

21/07/2014

the property. Current and future climate change considerations require that open spaces be provided to serve for uses including biodiversity and flood protection.

- All proposed infrastructure must be designed to be resilient to climate change considerations. This includes the design of bridges to facilitate water flow and the relocation of sewers pipes, where upgrades to larger pipes are proposed, to outside the 1:100 year floodline and delineated wetland.
- In addition to conservation and protection of sensitive natural open space areas, provision would need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of this Department. No public open space contributions will be accepted in lieu of parkland
- The Open Space Framework proposes that a standard of 2,4 ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open spaces such as protected areas high sensitivity vegetation and ridges or wetlands and associated buffers.
- This Department does not support multiple crossing of water bodies. There is a great need to revise the layout plan to accommodate this concern.
- The outcomes of all the Specialist Studies proposed in the Final Scoping Report must be used to generate a composite sensitivity map that will inform the layout plan of the proposed township. Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment (not yet compiled and considered in the current layout) and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003).
- All services related specialist studies/reports must be included and evaluated in the EIA report. The EIA must also show all existing servitudes/services and proposed upgrades including servitudes and confirm whether all listed activities have been applied for.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.

Having considered the above factors it is evident that the proposed development has detrimental impacts that will affect the receiving environment. Since the EIA process is underway, The outcome of the Specialist Studies (some of which have not yet been compiled considered, may have spatial implications for the proposal. The Department objects to the application and is of the opinion that **this application must be pended until the EIA process is finalised.**

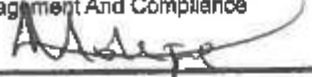
Should you have any queries or require any further information, please do not hesitate to contact me.

Yours sincerely,

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature

Date



21/07/2014

Lebo Molefe

Acting Unit Head: Impact Management and Compliance Monitoring

Tel: 011 587 4205

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site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer.

- It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environment, Infrastructure Services Department (see Annexure B for details).
- The application makes reference to the provision and upgrading of associated infrastructures such as sewage line, water supply, and electricity supply including a substation and roads among others. These activities are likely to pose detrimental environmental impacts on the receiving environment; therefore, they need to be assessed thoroughly in the Environmental Impact Assessment Report.
- The Greater Linksfield Mixed Inclusionary Development has been divided into eight townships and this Department has received all eight separate Township Establishment applications (Sunningdale Extension 13 – 20) for comments.

Specific findings (Sunningdale Extension 19):

- | | |
|--|--|
| <p>Signature _____</p> <p>Date _____</p> | <ul style="list-style-type: none"> • Sunningdale Extension 19 is proposed to have three erven where two erven will be zoned "Commercial" (for commercial uses as per scheme, motor related uses, offices, self-storage units and public garage) and measure 17.17 ha and one erf will be zoned "Private Open Space" for a Park (2.28 ha). • This township occupies the eastern portion of the greater development and measures 19.45ha in extent. • Erf 34 of the proposed development, zoned "Private Open Space", is affected by the 1:100 year floodline and wetland associated to the tributary of the Jukskei River. • The proposed layout plan (Annexure O) indicates that the 30m buffer required in terms of the City of Johannesburg Catchment Management Policy has been calculated from the wetland layer instead of the 1:100 year floodline where it is greater than the wetland delineation. The proposed layout assumes the standard wetland or riparian zone buffers of 30 m. In the absence of detailed Fauna and Flora studies, it is not possible to determine the final width of the buffers, which may require to be increased on the basis of biodiversity issues. Critical drainage pressures in the sub region may also warrant the imposition of increased riparian buffers for hydrological protection. The Health Assessment and Risk Study will also determine whether any buffers are required around the hospital and the cemetery. • There are 'rocky' areas within the property. The Fauna and Flora study to be done as part of the EIA Study must indicate what 'rocky' means with respect to environmental sensitivities. The Bulk Civil Engineering Services Report or relevant study must indicate whether blasting will be required and impact must be addressed in the EIA. The Geotechnical survey classifies the site as zone 1. A summary of the Geotechnical zones has been given on the attached draft layout plan: SUNNING_19LayD2014.03.13. |
|--|--|

Comments:

- In terms of City of Johannesburg Catchment Management Policy no development activity will be supported within the 30m buffer of the delineated wetland and certified 1:100 year floodline, whichever is the greatest. Therefore, the layout plan needs to be amended in line with this.
- All the areas within the 30m buffer of the delineated wetland and certified 1:100 year floodline, whichever is the greatest must be zoned Public Open Space.
- The purpose of these areas is conservation and not recreational. The areas are also linked to a wider open space system which is zoned public open space to the north and south of

ANNEXURE A

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature

Date


21/01/2014

ANNEXURE B

Instrumental variables (IV) estimation is used to address endogeneity bias in regression models. This method is particularly useful when the explanatory variable is correlated with the error term. The IV approach uses an instrument that is correlated with the explanatory variable but uncorrelated with the error term. The instrument is used to create a predicted value of the explanatory variable, which is then used in the regression model. This process helps to isolate the causal effect of the explanatory variable on the outcome variable.



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Date: 25/04/2014

Lizelle Gregory
Bokamoso Landscape Architects and Environmental Consultants
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Maroelana
0161

Lizelleg@mweb.co.za

Dear Madam

SCOPING REPORT FOR THE PROPOSED MIXED USE DEVELOPMENT ON PORTIONS 87, 148, 149 AND THE REMAINDER OF PORTION 1 OF THE FARM RIETFontein 61-IR: GAUT: 002/13-14/E0153

The Draft and Final Scoping Reports dated December 2013 and February 2014 received from Bokamoso Landscape Architects and Environmental Consultants has reference.

Description of the project

The application is for the Environmental Authorisation from the Gauteng Department of Agriculture and Rural Development in accordance with NEMA EIA Regulations, 2010. The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures on Portions 87, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.

The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital and specializes in the treatment of Tuberculosis, HIV testing and counselling and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation. The subject property is zoned "Agricultural" subject to conditions stated on page 21 of the Scoping Report.

Guidelines, By-laws, Precinct Plans, Policies and Environmental Management Frameworks:

In terms of EIA Regulations, 2010, the proposed activity is listed in all three listing notices and requires Environmental Authorisation prior to the commencement. Fully fledged EIA is required for this kind of development.

The Sub Area 28 of the 2010-2011 Region E RSDF is a large, relatively underutilised Sub Area and is one of the last remaining open tracts in the City of Johannesburg. It is the location of critical public health institutions. It aims amongst other things to reinforce this area as an institutional node focusing on the medical field and to promote residential development, particularly low income residential development.

Although the RSDF promotes the development of this area, it also appeals for the protection of the sensitive environmental attributes such as the Jukskei River and its tributaries as well as the associated wetlands and floodlines.

Description of alternatives

The submitted Draft and Final Scoping Reports has identified adequate alternatives for executing the proposed activity. These include the No-Go, Land Use, Services, Locality and Layout alternatives. However, section 6 of the Scoping Report has prematurely ruled off some identified alternatives without assessing them i.e. section 6.2.2: Residential development.

Description and assessment of the identified environmental issues

The submitted report in Section 10 and the attached plan of study has identified and assessed a number of environmental issues including but not limited to biophysical and socio-economic impacts of the proposed development during construction and operational phases. The methodology for assessing the identified issues has been outlined in the report and is satisfactory.

Geology and Soils

The site is underlain by mafic and granitic rocks and it is not underlain by dolomitic bedrock. Stability investigation of the site is not necessary. The soils of the site pose geotechnical constraints that warrant precautionary foundation measures due to the following:

- Collapsible soil horizons in the residual granitic soil
- Perched water tables that may form on the bedrock and pedogenic horizon interface with the overlying soils with possible surface seepage zones on the lower slopes and next to the drainage channels
- Difficult excavation conditions due to shallow bedrock
- Higher runoff and surface ponding due to low infiltration

The detailed Geotechnical report will be compiled and submitted with comments from the Council of Geosciences as part of the EIR. The Geotechnical engineer will confirm the presence of hazardous waste covered under the ground, if any.

Hydrology

The proposed site is affected by both 1:50 and 1:100 year floodlines. The Jukskei River floodplain and its tributaries as well as valley bottom wetland systems flows or occur on the site. The channels of both the Jukskei River and its tributaries are significantly degraded due to increased stormwater runoff, historical agricultural activities, historical infrastructure development, and failed human interventions in controlling erosion. Significant engineering intervention is required to stabilise the banks.

Two small wetlands identified on site are said to be disturbed but they can be rehabilitated and kept as open spaces. Therefore, detailed wetland delineation, assessment and protection measures as well as stormwater management plan must be submitted with the EIR. This will help to alleviate possible adverse impacts on the integrity and sustainability of the wetlands.

Topography

The natural drainage system will have to transfer the arrival of additional stormwater faster. The change in development hydrology and stormwater attenuation is essential in order to offset the

potential unfavourable impacts of post development. The topographical characteristics have a negative effect on the development potential of the site. The stormwater management plan must take cognizance of the topography of the site.

Climate

Wet summer conditions may make construction and environmental rehabilitation very difficult whereas dry and windy conditions may exacerbate dust pollution. Climatic conditions need to be taken into consideration when scheduling construction works on site.

Fauna and Flora

The site is ecologically sensitive since it has the primary vegetation, rivers and wetland accommodating Red listed mammals, Red listed plants, Orange listed plants, invertebrates and birds. The proposed activity is likely to have adverse detrimental impacts on biodiversity and ecosystems on site and off site as well. Therefore, a detailed Fauna and Flora survey, including a specialist biodiversity studies, will be done and reports submitted as part of the EIR.

Heritage

Buildings and infrastructure representing all periods from 1890 to modern times forming part of the Hospital Complex occur on site. Three cemetery sites were identified and the possibility of more burial sites or graves is still to be investigated. The relocation of Sizwe Hospital is a concern. A full heritage report must be submitted as part of the EIR where the comments from SAHRA must be addressed.

Land pollution and Infectious Diseases

The site is general a vacant open space perceived to be contaminated due to the excessive dumping of rubbish and potential hazardous waste related to the cemeteries on site. The various graves are associated with the Sizwe Hospital established to treat infectious diseases. Those who died of these infections were buried on this site. It is reported that animals that died of anthrax were also buried on the site. It is crucial to conduct a detailed assessment of the site to establish the location of the graves and their treatment. There is also a need to conduct a detailed soil and water analysis to determine the presence of spore/ pathogens/ viruses and the threat/ risk to humans during construction and occupation. The outcomes of these studies must be included in the EIR.

Agricultural Potential

The agricultural potential of the site ranges from high to very low. The proposed development is likely to take away soils with high potential for agricultural productivity. In this regard the applicant may consider conducting a thorough agricultural potential of the land in order to incorporate agricultural activities into the proposal such that food security and food safety in the region can be attained at the same time.

Land use

Although the site is located in an area characterized as residential area with many complimentary business operations, it is mostly vacant and undeveloped with the exception of approximately 25ha occupied by the hospital complex, cemeteries and personnel accommodation. The proposed activity includes among others the residential, retail, offices, light industrial, educational, medical facilities, hotels and conference facilities. A needs assessment and economic impact assessment will be conducted and the report attached to the EIR.

Visual Impact

The proposed activity is likely to have adverse visual impact since and therefore lead to the loss of "sense of place". A detailed visual impact assessment must be conducted and mitigation measures supplied during EIA. Architectural guidelines must be based on the mitigation measures. Cultural and historical features that contribute to the "sense of place" must be identified. Aesthetic areas must be identified. The reports must be attached to the EIR.

Noise Impact

The development is likely to have adverse noise impact on the surrounding residents. Therefore, noise impact assessment must be conducted in order to come up with mitigation measures. The report and mitigation measures should be submitted with the EIR.

Light pollution

Street and security lighting may have negative impacts on the eyes of the oncoming traffic and residents if not properly installed. Mitigation measures must be investigated during EIA process and included in the EIR.

Air quality

Atmospheric pollution is likely to occur during construction phase, especially due dust and infectious diseases. Dust suppression techniques such as sprinkling the construction site regularly water and dust nets may mitigate the impacts to the ambient levels.

Demography

Population statistics are very crucial to ascertain the need and viability of a development of this magnitude. Motivations in this regard will be attached to the EIR.

Bulk services

Upgrades and new water and sewer infrastructure would be required to service the proposed development. The combination of Bruma outfall and the diversion of Iliondale pump station to the Modderfontein outfall will provide sufficient capacity. Where the pipelines cross water courses, appropriate licenses will be sought. Detailed assessment and recommendations for adequate services must be included in the EIA report.

Stormwater has a significant influence on site development methodology. A Stormwater Master Plan has been compiled. Detention facilities are proposed to be utilized during design storm occurrences in order to contribute to the ecological wellbeing of the riverine systems. All external stormwater pipes and channels must be indicated on the plans. Details of the properties that would be affected by the Stormwater Management Plan must be provided including the servitudes to be registered.

The existing underground and overhead bulk electricity network would supply the required electricity to this development. Johannesburg City Power has indicated that there should be enough capacity from the underground network even though there might be a need to supply from several 11kV circuits which are yet to be identified. The developer may be required to construct a switching station in line with Johannesburg City Power's specifications and standards. The position of the switching station is yet to be finalized. Details of the properties that would be affected by the proposed electricity upgrad must be provided including the servitudes to be registered.

The alternative energy sources such as gas, solar water heating and solar energy for streets and area lighting would be used in the proposed development. Gas will be supplied from the Egoli Gas High Pressure Pump Station at 5 Edward Avenue in Sandringham and it alignment will follow existing roads to the edge of the development site.

The waste management aspect is not clear in terms of who will remove what kind waste and dispose them off where and how? Therefore, a confirmation on who will handle domestic and industrial waste must be provided in the EIR. Details of relevant landfill sites where the waste will be disposed must be provided as well as the capacity confirmation.

Traffic

The proposed development is in close proximity to the airports, rail, bus rapid transit and freeways. Major roads around the site will be upgraded and other roads are proposed within the development. The site is accessible through the N3/Linksfield Road interchange and

N3/Modderfontein Road interchange. The entire transportation and traffic impact investigation must be included in the EIA report.

Public Participation Process

This process is very crucial in the EIA process. The public will be given another opportunity to raise their views about the proposed activity during EIA phase. The issues and comments raised will be included in the EIR.

Recommendations

This Department is of the opinion that, looking at the nature and magnitude of this activity and associated impacts on the surrounding ecological and socio-economic environment, the following issues must be addressed in the Environmental Impact Assessment Report:

- The identified alternatives must be assessed comparatively in order to come up with the best suitable alternatives (proposals) and mitigation measures that are project and site specific.
- Specialist studies to determine the locality, extent and proper management of the sensitive environmental features as per the discussion above must be conducted as stipulated in the Draft and Final Scoping Reports' Section 10 and accompanying Plan of Study (Annexure D). These are necessary in order to minimize adverse impacts on the environment and to ensure that the natural environment is adequately streamlined into the proposed development and the benefits thereof are fully realized.
- Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003).
- The Draft and Final Scoping Reports on page 2 indicated the possibility of the occurrence of graves on site where people and/or animals that died from infectious diseases were buried. A detailed investigation into this (health assessment and risk study) must be conducted by a suitably qualified specialist. The Department of Health (at all spheres of government including the medical institutions in the surrounding area), and Johannesburg City Parks must be given an opportunity to comment on this report prior to the submission of the EIA report.
- In the process of engaging the Department of Health and the medical facilities in the area, there are crucial issues that must be addressed. Those issues include the type of treatment offered, risks, buffers required, and the relocation of Sizwe Hospital among others.
- The Health Assessment and Risk study must include but not only limited to the location of grave, number of graves, list of causes of death, indication on whether humans or animals are buried in such grave, compatible land uses, expert opinion on soil and/or ground water contamination including buffer requirements. The results of the study must be review independently.
- Upon completion of the studies, a composite sensitivity map overlaid with the proposed development land uses must also be submitted with the EIA report. The map must be legible.
- All the issues raised by the interested and/or affected parties must be considered and addressed, including the issue of the alternative that was proposed a number of year back for the property to be used for a 'medical park.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.
- The layout plan must further avoid the roads that cross the sensitive areas.
- All services reports must be included and evaluated in the EIA report.

Should you have any queries or require any further information, please do not hesitate to contact the Department.

Kind regards,



Linda Kuhn

Acting Unit Head: Impact Management and Compliance Monitoring

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CC: Simon Mafu

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INTERNAL MEMO

TO : Mr T Tshimange

CC : Mr L Nevuthalu

FROM : Jane Eagle

YOUR REF : PROPOSED SUNNINGDALE EXT 18

DATE : 25 June 2014

Reference is made to the application for the establishment of a township – proposed Sunningdale Ext 18 on a part of Rem of Portion 1, Ptn 137, Ptn 138 and Ptn 149 Rietfontein 61 IR. It is further understood that this is but one of a number of townships making up what is referred to by the applicant as the Linksfield Mixed Use Inclusionary Development comprising 8 proposed townships, proposed Extensions 13 to 20, on amongst others, Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR, measuring approximately 271,57 ha. The proposed actual development area measures approximately 194,99 ha in extent. The property is zoned "Agricultural" subject to conditions.

General:

In regard to the proposed township application, there are a number of procedural aspects which are of concern and need to be addressed.

Firstly, for a site of such environmental sensitivity, it is unacceptable and premature for the township establishment process to be so far advanced and comments sought prior to the completion of critical environmental studies as part of an Environmental Impact Assessment. In the absence of certain essential specialist environmental studies, any comments from an environmental perspective can only be limited and based on general site attributes. This is contrary to the spirit of NEMA which holds all decision making authorities and regulators accountable to consideration of NEMA principles in their decision making processes. It is regarded as entirely premature to be requested to provide comments on the town planning application when certain critical environmental specialist studies have not been completed.

In our view the application remains incomplete without the availability of the specialist studies, and cannot be properly assessed from an environmental perspective.

Secondly, it is questionable why the development is being considered as a number of discrete townships, rather than on a holistic basis for an integrated development. The environmental sensitivities and importance of the overall site comprising all proposed townships, as highlighted below, underscore the need for any development proposals to be considered in an integral manner, taking cognizance of the total site proposed for development, and of the development framework for the larger site as a whole. The correct process for consideration of a site of this sensitivity and extent would be a Strategic Environmental Assessment. This should ideally precede any environmental authorization issues.

Declaration form

Notwithstanding, it should be noted that the major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 4 (CBA4), and some lesser portions being classified as Critical Biodiversity Areas 2 or 3. Publications of others have been acknowledged by means of reference techniques.

The applicant's own specialist report confirms the environmental importance and sensitivities of the site.

I have read and understood Tutorial Letter CMNALLE/301 regarding technical and

presentation requirements, referencing techniques and plagiarism. The report under site appears to completely disregard these sensitivities or biodiversity aspects in favour of development, with a minimum buffer proposed on a very constrained riparian zone. In the absence of the detailed fauna and flora studies to inform otherwise, important biodiversity sites, in particular those classified as CBAs, should be excluded from the development areas and conserved as environmentally sensitive areas.

Thabiso Makosa

Further, the 'Developmental Precincts' identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the site must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways.

The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City. The proposed layout also appears to assume the standard wetland or riparian zone buffers of 30 m. In the absence of detailed fauna and flora studies, it is not possible to determine the final width of the buffers, which may require to be increased on the basis of biodiversity issues. Critical drainage pressures in the sub region may also warrant the imposition of increased riparian buffers for hydrological protection.

Glaringly absent in the motivation memorandum is any acknowledgement of how the proposal in any way serves the needs of the environment or sustainability and biodiversity protection, or the planning objectives of Sub Area 28, in particular the recommended interventions "To Protect the quality and integrity of the environment". While the report has acknowledged this objective, there is nothing in the proposed layout and overall development approach to suggest that anything more than lip service has been paid to this aspiration. It is in fact disingenuous for the report to cite a principle such as "Emphasis will be placed on quality public space, pedestrian environment, public parks and protection of biodiversity areas when in fact the proposed layout implies the large scale loss of areas designated as Critical Biodiversity Areas.

Biodiversity conservation aspects and ecological linkages are barely acknowledged in the proposed development approach and layout which fails to address a number of findings from the applicant's own specialist findings for the scoping phase, as well as various COJ policies and approved planning tools such as the COJ Wetland Protection and Management Plan, which highlight Modderfontein as having one of the most important wetland systems from a biodiversity perspective. The site now under consideration is a critical link area between open space areas and refuges on Huddle Park, and the greater Modderfontein area. The preliminary assessment undertaken by Bokamoso Landscape Architects and Evironmental Consultants underscores the conservation importance of this site, identified a number of environmental sensitivities and conservation features identified as 'Irreplaceable' in terms of the Gauteng C Plan, including:

- Habitat for Red listed mammals
- Habitat for Red listed plants
- Orange listed plant habitat
- PPrimary vegetation
- Rivers and wetland
- Invertebrates, and
- Bird Life.

The report further highlights the likely impacts as inter alia

- Loss of sensitive grassland areas
- Possible red data flora and fauna species,
- Sensitive vegetation
- Loss of habitat
- Loss of movement corridor and lack of open space links.

The proposed layout does not appear to have made any attempt to deal with these issues, merely providing for a narrow riparian corridor, most of which is proposed as recreational parks for residents of the proposed development.

The proposed amended layout both appear to overlook these important conservation areas and make provision only for the protection of a narrowly defined, minimum wetland and riparian zone through the development.

Wetland protection and management

Both the original layout and the proposed amended layout do identify wetland areas associated with the watercourses that traverse the site. While the extent of wetlands does not necessarily preclude development on the entire site, the development would have to comply with the provisions of the approved COJ Catchment Management Policy be adhered to i.e. That the riparian zone/wetland and associated buffer zone of 30 metres from the outer edge of the wetland temporary zone be designated as sensitive and no development be permitted within such wetland and buffer zone or within the 1:100 year floodline, whichever is the greatest. In addition, the hydrological linkages and dependencies also need to be properly understood and protected within any development of the site. Given that the valley bottom wetland forms part of a continuous open space system it is required that this area be designated as sensitive and conserved in a manner which protects its ecological functions. As indicated, it is possible that increased buffers may be warranted for the site due to biodiversity, habitat and hydrological imperatives.

Even the applicant's own geotechnical report confirms the expected geotechnical constraints for the sites as being:

- Collapsible soil
- Seasonal shallow groundwater, perched groundwater and surface seepage near the floodplain,
- Moderate erodability of surficial soils and
- localised difficulty of excavation to 1.5 m depth

Further, the site is within Wetland Management Zone 1 as identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection. In terms of key management concerns for Wetland Management Zone 1, management of sediments and water quality are both identified as key, while pre-emptive engineering is advocated whereby sufficient space is maintained for the systems to adjust with little active intervention to the changes in hydrology or that active engineering is applied so as to ensure that wetland management objectives are met.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Storm Water Management

In regard to the two options proposed for the management of stormwater and drainage associated with the proposed development, while it is regarded as entirely premature to be

discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are NOT supported by this unit and are STRONGLY OPPOSED. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer, and the following conditions would apply:

A storm water management plan will need to be submitted for the approval by both the Johannesburg Roads Agency and Environmental Management prior to the approval of the final Site Development Plan, and will be required to implement a storm water management scheme to meet the following criteria/standards:

- Peak discharge - no increase in discharge for any event of any duration up to the 25 year RI event

- Volume of runoff - no increase up to the annual 10 year rainfall

- Runoff frequency - no surface runoff for the 1 yr RI event of any duration

- Water Quality - no deterioration

Space allocation for storm water management must be indicated on the site development plan, outside of the wetland and wetland buffer areas or any environmentally sensitive areas. NO in-stream attenuation measures will be considered acceptable.

The storm water management plan should in any event minimize the generation of surface runoff and storm water through adopting the principles of Water Sensitive Urban Design (WSUDS) and Sustainable Urban Drainage Systems (SUDS) which provide various options such as bio-retention ponds, enhanced swales and grass lined channels, stone filled infiltration ditches, permeable paving etc. in order to minimize surface runoff and to maintain water quality.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Open Space Provision

In addition to conservation and protection of sensitive natural open space areas, provision would need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of the Environmental Management Department of COJ. No public open space contributions will be accepted in lieu of parkland

The Open Space Framework proposes that a standard of 2,4 ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open spaces such as protected areas high sensitivity vegetation and ridges or wetlands and associated buffers.

Land Use / Zonings

As stated above, it is considered entirely premature to be considering the town planning application prior to the availability of final detailed specialist environmental studies. Notwithstanding, should the principle of development of parts of the site be approved, consideration should be given to the recommendations of the draft Bio Regional Plan for Johannesburg and to the COJ Open Space Framework in regard to those land uses which are

appropriate to areas immediately adjacent to important biodiversity areas or sensitive environmental sites. This should be taken into account in terms of land use, detailed layouts, densities and typologies.

Layout

It is our view that consideration of the township should not be proceeded with until all the necessary detailed environmental specialist studies are available and a sound Strategic Environmental Assessment approach has been followed to inform any development approach for such an environmentally sensitive site which should inform the basic principles of any development approach and ensure that the interests of environmental sustainability and biodiversity protection have been adequately addressed and considered. It is our considered opinion that the current approach of fragmented township applications does not meet the requirements for holistic and sustainable development approach to such a precious site within the City and that the township applications are premature.

In light of the above, this division cannot support the proposed township or associated layout until the concerns and environmental issues highlighted above have been resolved.

Should you require further clarity on any of the above issues, please do not hesitate to contact me.

Regards

Jane Eagle
Assistant Director: Open Space Planning
Environmental Management

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UNIT : IMPACT MANAGEMENT AND COMPLIANCE MONITORING

INTERNAL MEMO

TO : Ben Pretorius

FROM : Tshilldzi Tshimange

YOUR REF : 08-14210

DATE : 21 July 2014

City Of Joburg

Environment Infrastructure and Services Department
Impact Management And Compliance

Signature

Date

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21/07/2014

APPLICATION: TOWNSHIP ESTABLISHMENT

PROPERTY DESCRIPTION: SUNNINGDALE EXTENSION 18

The application is for the establishment of a mixed use development .

We have examined this application in terms of the following environmental criteria:

- Location;
- Surrounding land uses;
- Proximity to conservation areas and areas of ecological importance;
- Alignment to environmental standards, legislation and policies including:
 - National Environment Management Act (Act 107 of 1998) as amended (NEMA) and Environmental Impact Assessment Regulations, 2010
 - City of Johannesburg Catchment Management Policy, 2008
 - Johannesburg Metropolitan Open Space Systems, 2008
- City of Johannesburg GIS layers including Wetland Audits, Streams and Rivers, 1:100 year floodlines, and Biodiversity Sector Plan; and
- The reviewed Final Scoping Report (also included in the application).

General findings (Sunningdale Extensions 13 – 20 / Linksfield Mixed Use Inclusionary Development):

- The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures among others on Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.
- The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital that specializes in the treatment of Tuberculosis, HIV testing and counselling and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation.

- The subject property is zoned "Agricultural" subject to conditions stated on Page 21 of the Final Scoping Report attached in this application as Annexure J.
 - In terms of the City of Johannesburg GIS layers the site is affected by Channelled Valley Bottom Wetlands, the Jukskei River and its tributaries, 1:100 year floodlines and Critical Biodiversity Areas. This has been confirmed in the application.
 - The major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 1 (CBA1), and some lesser portions being classified as Critical Biodiversity Area 2 (CBA 2).
 - The site is within Wetland Management Zone 1 as identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection.
 - It is reported that individuals and animals that died of anthrax and other contagious diseases were buried on site.
 - Instead of the preferred Strategic Environmental Assessment, the Environmental Impact Assessment process has been initiated and this Department has commented on the Final Scoping Report on the 24th of April 2014 (attached as Annexure J: Final Scoping Report in the application).
 - The comments are attached here as **Annexure A** for your ease of reference. Comments made by the Department include the following:
 - The Health Assessment and Risk Study must be conducted. It must include the location of identified graves, causes of death and expert opinion on soil and/or groundwater contamination including buffer requirements.
 - The proposal to relocate Sizwe Hospital to Edenvale Hospital must be explored further. It must be confirmed whether there is a buffer required around the hospital for the current operations due to the nature of illnesses that are treated.
 - Other studies including the Fauna and Flora, Wetland Delineation and Geo-hydrological Assessment must be conducted and included in the Environmental Impact Report.
- Studies included in the application are as follows:
- Annexure K: Final Report on Phase 1 Geotechnical Site Investigation;
 - Annexure L: Bulk Civil Engineering Service Report;
 - Annexure M: Bulk Electrical Statement; and
 - Annexure N: Traffic Impact Assessment.
- The "Developmental Precincts" identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the open space must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways. The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City.
 - The application has identified two strategies for stormwater management including attenuation of accumulated stormwater in the Jukskei River, and attenuation of stormwater before draining into Jukskei River (Annexure L). While it is regarded as entirely premature to be discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are NOT supported by this Department and are **STRONGLY OPPOSED**. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer.:
 - It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the

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Date: 21/07/2014

these areas is conservation and not recreational. The areas are also linked to a wider open space system which is zoned public open space to the north and south of the property. Current and future climate change considerations require that open spaces be provided to serve for uses including biodiversity and flood protection.

- All proposed infrastructure must be designed to be resilient to climate change considerations. This includes the design of bridges to facilitate water flow and the relocation of sewers pipes, where upgrades to larger pipes are proposed, to outside the 1:100 year floodline and delineated wetland.
- In addition to conservation and protection of sensitive natural open space areas, provision would need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of this Department. No public open space contributions will be accepted in lieu of parkland
- The Open Space Framework proposes that a standard of 2,4 ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open spaces such as protected areas high sensitivity vegetation and ridges or wetlands and associated buffers.
- This Department does not support multiple crossing of water bodies. There is a great need to revise the layout plan to accommodate this concern.
- The outcomes of all the specialist studies proposed in the plan of study must be used to generate a composite sensitivity map that will inform the layout plan of the proposed township. Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment (not yet compiled and considered in the current layout) and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003). All services related specialist studies/reports must be included and evaluated in the EIA report. The EIA must also show all existing servitudes/services and proposed upgrades including servitudes and confirm whether all listed activities have been applied for.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.

Having considered the above factors it is evident that the proposed development has numerous detrimental impacts that will affect the receiving environment. Since the EIA process is underway. The outcome of the Specialist Studies, some of which have not yet been compiled considered, may have spatial implications for the proposal. The Department objects to the application and is of the opinion that **this application must be pended until the EIA process is finalised.**

Should you have any queries or require any further information, please do not hesitate to contact me.

Yours sincerely,

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature

Date

21/07/2014

Lebo Molefe

Acting Unit Head Impact Management and Compliance Monitoring

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supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environment, Infrastructure Services Department (see Annexure B for details).

- The application makes reference to the provision and upgrading of associated infrastructures such as sewage line, water supply, and electricity supply including a substation and roads among others. These activities are likely to pose detrimental environmental impacts on the receiving environment; therefore, they need to be assessed thoroughly in the Environmental Impact Assessment Report.
- The Greater Linksfield Mixed Inclusionary Development has been divided into eight townships and this Department has received all eight separate Township Establishment applications (Sunningdale Extension 13 – 20) for comments.

Specific findings (Sunningdale Extension 18):

- Sunningdale Extension 18 consists of four erven to be zoned as follows:
 - One erf (1.17ha) will be zoned "Special" (for dwelling houses, block or blocks of flats (at a maximum density of 160u/Ha), residential buildings, institutional uses, educational uses, shops, offices, commercial purposes, place of public worship, place of amusement, public street, private open space including such supportive uses,
 - One erf (2.75ha) will be zoned "Special" (for dwelling houses, block or blocks of flats (at a maximum density of 160u/Ha), residential buildings, institutional uses, educational uses, shops, offices, place of public worship, place of amusement, showrooms, motor related and commercial, gym, public street, private open space including such supportive uses,
 - One erf (4.08ha) will be zoned "Private Open Space" for a Park, and
 - One erf (8.03ha) will be zoned "Business 1" (for shops, offices, retail and business park, warehouse and distribution, business buildings, professional rooms, places of amusement, social hall, residential building except on ground floor)".
- This township occupies part of the central portion of the greater development and measures 16.04ha in extent.
- The area between Erven 16 and 17 of the proposed development is affected by the 1:100 year floodline and wetland associated to the Jukskei River.
- Erf 32 is zoned Private Open Space and will be used as a park. There is a pedestrian bridge proposed.
- The proposed layout plan (Annexure O and P) indicates that the 30m buffer required in terms of the City of Johannesburg Catchment Management Policy has been calculated from the wetland layer instead of the 1:100 year floodline as is the greater of the two. The proposed layout assumes the standard wetland or riparian zone buffers of 30 m. In the absence of detailed Fauna and Flora studies, it is not possible to determine the final width of the buffers, which may require to be increased on the basis of biodiversity issues. Critical drainage pressures in the sub region may also warrant the imposition of increased riparian buffers for hydrological protection. The Health Assessment and Risk Study will also determine whether any buffers are required around the hospital and the cemetery.
- The Geotechnical survey classifies the site as zone 1 and 2. A summary of the Geotechnical zones has been given on the attached draft layout plan: SUNNING_18LayD2014.03.11.

Comments:

- In terms of City of Johannesburg Catchment Management Policy no development activity will be supported within the 30m buffer of the delineated wetland and certified 1:100 year floodline, whichever is the greatest. Therefore, the layout plan needs to be amended in line with this.
- All the areas within the 30m buffer of the delineated wetland and certified 1:100 year floodline, whichever is the greatest must be zoned Public Open Space. The purpose of

ANNEXURE A

City Of Joburg
Environment Infrastructure and Services Department
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Signature M. Molefe

Date 21/07/2014



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Our Ref: TT/EIM/14/02/2014
Contact: Tshildzi Tshimange
CoJ Region: E
Tel: 011 587 4236
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Date: 25/04/2014

Lizelle Gregory
Bokamoso Landscape Architects and Environmental Consultants
P.O.Box 11375
Maroelana
0161

Lizelleg@mweb.co.za

Dear Madam

SCOPING REPORT FOR THE PROPOSED MIXED USE DEVELOPMENT ON PORTIONS 87, 148, 149 AND THE REMAINDER OF PORTION 1 OF THE FARM RIETFontein 61-IR: GAUT: 002/13-14/E0153

The Draft and Final Scoping Reports dated December 2013 and February 2014 received from Bokamoso Landscape Architects and Environmental Consultants has reference.

Description of the project

The application is for the Environmental Authorisation from the Gauteng Department of Agriculture and Rural Development in accordance with NEMA EIA Regulations, 2010. The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures on Portions 87, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.

The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital and specializes in the treatment of Tuberculosis, HIV testing and counselling and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation. The subject property is zoned "Agricultural" subject to conditions stated on page 21 of the Scoping Report.

Guidelines, By-laws, Precinct Plans, Policies and Environmental Management Frameworks:

In terms of EIA Regulations, 2010, the proposed activity is listed in all three listing notices and requires Environmental Authorisation prior to the commencement. Fully fledged EIA is required for this kind of development.

The Sub Area 28 of the 2010-2011 Region E RSDF is a large, relatively underutilised Sub Area and is one of the last remaining open tracts in the City of Johannesburg. It is the location of critical public health institutions. It aims amongst other things to reinforce this area as an institutional node focusing on the medical field and to promote residential development, particularly low income residential development.

Although the RSDF promotes the development of this area, it also appeals for the protection of the sensitive environmental attributes such as the Jukskei River and its tributaries as well as the associated wetlands and floodlines.

Description of alternatives

The submitted Draft and Final Scoping Reports has identified adequate alternatives for executing the proposed activity. These include the No-Go, Land Use, Services, Locality and Layout alternatives. However, section 6 of the Scoping Report has prematurely ruled off some identified alternatives without assessing them i.e. section 6.2.2: Residential development.

Description and assessment of the identified environmental issues

The submitted report in Section 10 and the attached plan of study has identified and assessed a number of environmental issues including but not limited to biophysical and socio-economic impacts of the proposed development during construction and operational phases. The methodology for assessing the identified issues has been outlined in the report and is satisfactory.

Geology and Soils

The site is underlain by mafic and granitic rocks and it is not underlain by dolomitic bedrock. Stability investigation of the site is not necessary. The soils of the site pose geotechnical constraints that warrant precautionary foundation measures due to the following:

- Collapsible soil horizons in the residual granitic soil
- Perched water tables that may form on the bedrock and pedogenic horizon interface with the overlying soils with possible surface seepage zones on the lower slopes and next to the drainage channels
- Difficult excavation conditions due to shallow bedrock
- Higher runoff and surface ponding due to low infiltration

The detailed Geotechnical report will be compiled and submitted with comments from the Council of Geosciences as part of the EIR. The Geotechnical engineer will confirm the presence of hazardous waste covered under the ground, if any.

Hydrology

The proposed site is affected by both 1:50 and 1:100 year floodlines. The Jukskei River floodplain and its tributaries as well as valley bottom wetland systems flows or occur on the site. The channels of both the Jukskei River and its tributaries are significantly degraded due to increased stormwater runoff, historical agricultural activities, historical infrastructure development, and failed human interventions in controlling erosion. Significant engineering intervention is required to stabilise the banks.

Two small wetlands identified on site are said to be disturbed but they can be rehabilitated and kept as open spaces. Therefore, detailed wetland delineation, assessment and protection measures as well as stormwater management plan must be submitted with the EIR. This will help to alleviate possible adverse impacts on the integrity and sustainability of the wetlands.

Topography

The natural drainage system will have to transfer the arrival of additional stormwater faster. The change in development hydrology and stormwater attenuation is essential in order to offset the

potential unfavourable impacts of post development. The topographical characteristics have a negative effect on the development potential of the site. The stormwater management plan must take cognizance of the topography of the site.

Climate

Wet summer conditions may make construction and environmental rehabilitation very difficult whereas dry and windy conditions may exacerbate dust pollution. Climatic conditions need to be taken into consideration when scheduling construction works on site.

Fauna and Flora

The site is ecologically sensitive since it has the primary vegetation, rivers and wetland accommodating Red listed mammals, Red listed plants, Orange listed plants, invertebrates and birds. The proposed activity is likely to have adverse detrimental impacts on biodiversity and ecosystems on site and off site as well. Therefore, a detailed Fauna and Flora survey, including a specialist biodiversity studies, will be done and reports submitted as part of the EIR.

Heritage

Buildings and infrastructure representing all periods from 1890 to modern times forming part of the Hospital Complex occur on site. Three cemetery sites were identified and the possibility of more burial sites or graves is still to be investigated. The relocation of Sizwe Hospital is a concern. A full heritage report must be submitted as part of the EIR where the comments from SAHRA must be addressed.

Land pollution and Infectious Diseases

The site is general a vacant open space perceived to be contaminated due to the excessive dumping of rubbish and potential hazardous waste related to the cemeteries on site. The various graves are associated with the Sizwe Hospital established to treat infectious diseases. Those who died of these infections were buried on this site. It is reported that animals that died of anthrax were also buried on the site. It is crucial to conduct a detailed assessment of the site to establish the location of the graves and their treatment. There is also a need to conduct a detailed soil and water analysis to determine the presence of spore/ pathogens/ viruses and the threat/ risk to humans during construction and occupation. The outcomes of these studies must be included in the EIR.

Agricultural Potential

The agricultural potential of the site ranges from high to very low. The proposed development is likely to take away soils with high potential for agricultural productivity. In this regard the applicant may consider conducting a thorough agricultural potential of the land in order to incorporate agricultural activities into the proposal such that food security and food safety in the region can be attained at the same time.

Land use

Although the site is located in an area characterized as residential area with many complimentary business operations, it is mostly vacant and undeveloped with the exception of approximately 25ha occupied by the hospital complex, cemeteries and personnel accommodation. The proposed activity includes among others the residential, retail, offices, light industrial, educational, medical facilities, hotels and conference facilities. A needs assessment and economic impact assessment will be conducted and the report attached to the EIR.

Visual Impact

The proposed activity is likely to have adverse visual impact since and therefore lead to the loss of "sense of place". A detailed visual impact assessment must be conducted and mitigation measures supplied during EIA. Architectural guidelines must be based on the mitigation measures. Cultural and historical features that contribute to the "sense of place" must be identified. Aesthetic areas must be identified. The reports must be attached to the EIR.

Noise Impact

The development is likely to have adverse noise impact on the surrounding residents. Therefore, noise impact assessment must be conducted in order to come up with mitigation measures. The report and mitigation measures should be submitted with the EIR.

Light pollution

Street and security lighting may have negative impacts on the eyes of the oncoming traffic and residents if not properly installed. Mitigation measures must be investigated during EIA process and included in the EIR.

Air quality

Atmospheric pollution is likely to occur during construction phase, especially due dust and infectious diseases. Dust suppression techniques such as sprinkling the construction site regularly water and dust nets may mitigate the impacts to the ambient levels.

Demography

Population statistics are very crucial to ascertain the need and viability of a development of this magnitude. Motivations in this regard will be attached to the EIR.

Bulk services

Upgrades and new water and sewer infrastructure would be required to service the proposed development. The combination of Bruma outfall and the diversion of Illiondale pump station to the Modderfontein outfall will provide sufficient capacity. Where the pipelines cross water courses, appropriate licenses will be sought. Detailed assessment and recommendations for adequate services must be included in the EIA report.

Stormwater has a significant influence on site development methodology. A Stormwater Master Plan has been compiled. Detention facilities are proposed to be utilized during design storm occurrences in order to contribute to the ecological wellbeing of the riverine systems. All external stormwater pipes and channels must be indicated on the plans. Details of the properties that would be affected by the Stormwater Management Plan must be provided including the servitudes to be registered.

The existing underground and overhead bulk electricity network would supply the required electricity to this development. Johannesburg City Power has indicated that there should be enough capacity from the underground network even though there might be a need to supply from several 11kV circuits which are yet to be identified. The developer may be required to construct a switching station in line with Johannesburg City Power's specifications and standards. The position of the switching station is yet to be finalized. Details of the properties that would be affected by the proposed electricity upgrad must be provided including the servitudes to be registered.

The alternative energy sources such as gas, solar water heating and solar energy for streets and area lighting would be used in the proposed development. Gas will be supplied from the Egoli Gas High Pressure Pump Station at 5 Edward Avenue in Sandringham and it alignment will follow existing roads to the edge of the development site.

The waste management aspect is not clear in terms of who will remove what kind waste and dispose them off where and how? Therefore, a confirmation on who will handle domestic and industrial waste must be provided in the EIR. Details of relevant landfill sites where the waste will be disposed must be provided as well as the capacity confirmation.

Traffic

The proposed development is in close proximity to the airports, rail, bus rapid transit and freeways. Major roads around the site will be upgraded and other roads are proposed within the development. The site is accessible through the N3/Linksfield Road interchange and

N3/Modderfontein Road interchange. The entire transportation and traffic impact investigation must be included in the EIA report.

Public Participation Process

This process is very crucial in the EIA process. The public will be given another opportunity to raise their views about the proposed activity during EIA phase. The issues and comments raised will be included in the EIR.

Recommendations

This Department is of the opinion that, looking at the nature and magnitude of this activity and associated impacts on the surrounding ecological and socio-economic environment, the following issues must be addressed in the Environmental Impact Assessment Report:

- The identified alternatives must be assessed comparatively in order to come up with the best suitable alternatives (proposals) and mitigation measures that are project and site specific.
- Specialist studies to determine the locality, extent and proper management of the sensitive environmental features as per the discussion above must be conducted as stipulated in the Draft and Final Scoping Reports' Section 10 and accompanying Plan of Study (Annexure D). These are necessary in order to minimize adverse impacts on the environment and to ensure that the natural environment is adequately streamlined into the proposed development and the benefits thereof are fully realized.
- Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003).
- The Draft and Final Scoping Reports on page 2 indicated the possibility of the occurrence of graves on site where people and/or animals that died from infectious diseases were buried. A detailed investigation into this (health assessment and risk study) must be conducted by a suitably qualified specialist. The Department of Health (at all spheres of government including the medical institutions in the surrounding area), and Johannesburg City Parks must be given an opportunity to comment on this report prior to the submission of the EIA report.
- In the process of engaging the Department of Health and the medical facilities in the area, there are crucial issues that must be addressed. Those issues include the type of treatment offered, risks, buffers required, and the relocation of Sizwe Hospital among others.
- The Health Assessment and Risk study must include but not only limited to the location of grave, number of graves, list of causes of death, indication on whether humans or animals are buried in such grave, compatible land uses, expert opinion on soil and/or ground water contamination including buffer requirements. The results of the study must be reviewed independently.
- Upon completion of the studies, a composite sensitivity map overlaid with the proposed development land uses must also be submitted with the EIA report. The map must be legible.
- All the issues raised by the interested and/or affected parties must be considered and addressed, including the issue of the alternative that was proposed a number of years back for the property to be used for a 'medical park'.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.
- The layout plan must further avoid the roads that cross the sensitive areas.
- All services reports must be included and evaluated in the EIA report.

Should you have any queries or require any further information, please do not hesitate to contact the Department.

Kind regards.



Linda Kuhn

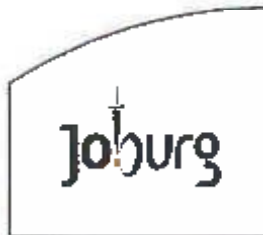
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CC: Simon Mafu

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INTERNAL MEMO

TO : Mr T Tshimange

CC : Mr L Nevuthalu

FROM : Jane Eagle

YOUR REF : PROPOSED SUNNINGDALE EXT 18

DATE : 25 June 2014

Reference is made to the application for the establishment of a township – proposed Sunningdale Ext 18 on a part of Rem of Portion 1, Ptn 137, Ptn 138 and Ptn 149 Rietfontein 61 IR. It is further understood that this is but one of a number of townships making up what is referred to by the applicant as the Linksfield Mixed Use Inclusionary Development comprising 8 proposed townships, proposed Extensions 13 to 20, amongst others, Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR, measuring approximately 271,57 ha. The proposed actual development area measures approximately 194,99 ha in extent. The property is zoned "Agricultural" subject to conditions.

General:

In regard to the proposed township application, there are a number of procedural aspects which are of concern and need to be addressed.

Firstly, for a site of such environmental sensitivity, it is unacceptable and premature for the township establishment process to be so far advanced and comments sought prior to the completion of critical environmental studies as part of an Environmental Impact Assessment. In the absence of certain essential specialist environmental studies, any comments from an environmental perspective can only be limited and based on general site attributes. This is contrary to the spirit of NEMA which holds all decision making authorities and regulators accountable to consideration of NEMA principles in their decision making processes. It is regarded as entirely premature to be requested to provide comments on the town planning application when certain critical environmental specialist studies have not been completed.

In our view the application remains incomplete without the availability of the specialist studies, and cannot be properly assessed from an environmental perspective.

Secondly, it is questionable why the development is being considered as a number of discrete townships, rather than on a holistic basis for an integrated development. The environmental sensitivities and importance of the overall site comprising all proposed townships, as highlighted below, underscore the need for any development proposals to be considered in an integral manner, taking cognizance of the total site proposed for development, and of the development framework for the larger site as a whole. The correct process for consideration of a site of this sensitivity and extent would be a Strategic Environmental Assessment. This should ideally precede any environmental authorization issues.

Biodiversity

Notwithstanding, it should be noted that the major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 1 (CBA1), and some lesser portions being classified as Critical Biodiversity Area 2 (CBA 2).

The applicant's own specialist report confirms the environmental importance and sensitivities of the site.

The layout for the wider site appears to completely disregard these sensitivities or biodiversity aspects in favour of development, with a minimum buffer proposed on a very constrained riparian zone. In the absence of the detailed fauna and flora studies to inform otherwise, important biodiversity sites, in particular those classified as CBAs, should be excluded from the development areas and conserved as environmentally sensitive areas.

Further, the 'Developmental Precincts' identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the open space must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways. The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City. The proposed layout also appears to assume the standard wetland or riparian zone buffers of 30 m. In the absence of detailed fauna and flora studies, it is not possible to determine the final width of the buffers, which may require to be increased on the basis of biodiversity issues. Critical drainage pressures in the sub region may also warrant the imposition of increased riparian buffers for hydrological protection.

Glaringly absent in the motivation memorandum is any acknowledgement of how the proposal in any way serves the needs of the environment or sustainability and biodiversity protection, or the planning objectives of Sub Area 28, in particular the recommended interventions "To Protect the quality and integrity of the environment". While the report has acknowledged this objective, there is nothing in the proposed layout and overall development approach to suggest that anything more than lip service has been paid to this aspiration. It is in fact disingenuous for the report to cite a principle such as "Emphasis will be placed on quality public space, pedestrian environment, public parks and **protection of biodiversity areas** when in fact the **proposed layout implies the large scale loss of areas designated as Critical Biodiversity Areas.**

Biodiversity conservation aspects and ecological linkages are barely acknowledged in the proposed development approach and layout which fails to address a number of findings from the applicant's own specialist findings for the scoping phase, as well as various COJ policies and approved planning tools such as the COJ Wetland Protection and Management Plan, which highlight Modderfontein as having one of the most important wetland systems from a biodiversity perspective. The site now under consideration is a critical link area between open space areas and refuges on Huddle Park, and the greater Modderfontein area. The preliminary assessment undertaken by Bokamoso Landscape Architects and Environmental Consultants underscores the conservation importance of this site, identified a number of environmental sensitivities and conservation features identified as 'Irreplaceable' in terms of the Gauteng C Plan, including:

- Habitat for Red listed mammals
- Habitat for Red listed plants
- Orange listed plant habitat
- PPrimary vegetation
- Rivers and wetland
- Invertebrates, and
- Bird Life.

The report further highlights the likely impacts as inter alia

- Loss of sensitive grassland areas
- Possible red data flora and fauna species,
- Sensitive vegetation
- Loss of habitat
- Loss of movement corridor and lack of open space links.

The proposed layout does not appear to have made any attempt to deal with these issues, merely providing for a narrow riparian corridor, most of which is proposed as recreational parks for residents of the proposed development.

The proposed amended layout both appear to overlook these important conservation areas and make provision only for the protection of a narrowly defined, minimum wetland and riparian zone through the development.

Wetland protection and management

Both the original layout and the proposed amended layout do identify wetland areas associated with the watercourses that traverse the site. While the extent of wetlands does not necessarily preclude development on the entire site, the development would have to comply with the provisions of the approved COJ Catchment Management Policy be adhered to i.e. That the riparian zone/wetland and associated buffer zone of 30 metres from the outer edge of the wetland temporary zone be designated as sensitive and no development be permitted within such wetland and buffer zone or within the 1:100 year floodline, whichever is the greatest. In addition, the hydrological linkages and dependencies also need to be properly understood and protected within any development of the site. Given that the valley bottom wetland forms part of a continuous open space system it is required that this area be designated as sensitive and conserved in a manner which protects its ecological functions. As indicated, it is possible that increased buffers may be warranted for the site due to biodiversity, habitat and hydrological imperatives.

Even the applicant's own geotechnical report confirms the expected geotechnical constraints for the sites as being:

- Collapsible soil
- Seasonal shallow groundwater, perched groundwater and surface seepage near the floodplain,
- Moderate erodability of surficial soils and
- localised difficulty of excavation to 1.5 m depth

Further, the site is within Wetland Management Zone 1 as identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection. In terms of key management concerns for Wetland Management Zone 1, management of sediments and water quality are both identified as key, while pre-emptive engineering is advocated whereby sufficient space is maintained for the systems to adjust with little active intervention to the changes in hydrology or that active engineering is applied so as to ensure that wetland management objectives are met.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Storm Water Management

In regard to the two options proposed for the management of stormwater and drainage associated with the proposed development, while it is regarded as entirely premature to be

discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are NOT supported by this unit and are **STRONGLY OPPOSED**. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer, and the following conditions would apply:

A storm water management plan will need to be submitted for the approval by both the Johannesburg Roads Agency and Environmental Management prior to the approval of the final Site Development Plan, and will be required to implement a storm water management scheme to meet the following criteria/standards:

- Peak discharge - no increase in discharge for any event of any duration up to the 25 year RI event

- Volume of runoff - no increase up to the annual 10 year rainfall

- Runoff frequency - no surface runoff for the 1 yr RI event of any duration

- Water Quality - no deterioration

Space allocation for storm water management must be indicated on the site development plan, outside of the wetland and wetland buffer areas or any environmentally sensitive areas. NO in-stream attenuation measures will be considered acceptable.

The storm water management plan should in any event minimize the generation of surface runoff and storm water through adopting the principles of Water Sensitive Urban Design (WSUDS) and Sustainable Urban Drainage Systems (SUDS) which provide various options such as bio-retention ponds, enhanced swales and grass lined channels, stone filled infiltration ditches, permeable paving etc. in order to minimize surface runoff and to maintain water quality.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Open Space Provision

In addition to conservation and protection of sensitive natural open space areas, provision would need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of the Environmental Management Department of COJ. No public open space contributions will be accepted in lieu of parkland

The Open Space Framework proposes that a standard of 2,4 ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open spaces such as protected areas high sensitivity vegetation and ridges or wetlands and associated buffers.

Land Use / Zonings

As stated above, it is considered entirely premature to be considering the town planning application prior to the availability of final detailed specialist environmental studies. Notwithstanding, should the principle of development of parts of the site be approved, consideration should be given to the recommendations of the draft Bio Regional Plan for Johannesburg and to the COJ Open Space Framework in regard to those land uses which are

appropriate to areas immediately adjacent to important biodiversity areas or sensitive environmental sites. This should be taken into account in terms of land use, detailed layouts, densities and typologies.

Layout

It is our view that consideration of the township should not be proceeded with until all the necessary detailed environmental specialist studies are available and a sound Strategic Environmental Assessment approach has been followed to inform any development approach for such an environmentally sensitive site which should inform the basic principles of any development approach and ensure that the interests of environmental sustainability and biodiversity protection have been adequately addressed and considered. It is our considered opinion that the current approach of fragmented township applications does not meet the requirements for holistic and sustainable development approach to such a precious site within the City and that the township applications are premature.

In light of the above, this division cannot support the proposed township or associated layout until the concerns and environmental issues highlighted above have been resolved.

Should you require further clarity on any of the above issues, please do not hesitate to contact me.

Regards

Jane Eagle
Assistant Director: Open Space Planning
Environmental Management

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Fax: 5874273
Cell: 0824142431



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UNIT : IMPACT MANAGEMENT AND COMPLIANCE MONITORING

INTERNAL MEMO

TO : Ben Pretorius

FROM : Tshilidzi Tshimange

YOUR REF : 08-14209

DATE : 21 July 2014

City Of Joburg

Environment Infrastructure and Services Department
Impact Management And Compliance

Signature

Date

[Handwritten Signature]
21/07/2014

APPLICATION: TOWNSHIP ESTABLISHMENT

PROPERTY DESCRIPTION: SUNNINGDALE EXTENSION 17

The application is for the establishment of a mixed use development on a part of Re Portion 1, Portion 137, Portion 138 and Portion 149 Rietfontein 61-IR.

We have examined this application in terms of the following environmental criteria:

- Location
- Surrounding land uses
- Proximity to conservation areas and areas of ecological importance.
- Alignment to environmental standards, legislation and policies including
 - National Environment Management Act (Act 107 of 1998) as amended (NEMA) and Environmental Impact Assessment Regulations, 2010
 - City of Johannesburg Catchment Management Policy, 2008
 - Johannesburg Metropolitan Open Space Systems, 2008
- City of Johannesburg GIS layers including Wetland Audits, Streams and Rivers, 1:100 year floodlines, and Biodiversity Sector Plan; and
- The reviewed Final Scoping Report (also included in the application).

General findings (Sunningdale Extensions 13 – 20 / Linksfield Mixed Use Inclusionary Development):

- The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures among others on Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.
- The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital that specializes in the treatment of Tuberculosis, HIV testing and counselling and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation.

- The subject property is zoned "Agricultural" subject to conditions stated on Page 21 of the Final Scoping Report attached in this application as Annexure J.
- In terms of the City of Johannesburg GIS layers the site is affected by Channelled Valley Bottom Wetlands, the Jukskei River and its tributaries, 1:100 year floodlines and Critical Biodiversity Areas. This has been confirmed in the application.
- The major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 1 (CBA1), and some lesser portions being classified as Critical Biodiversity Area 2 (CBA 2).
- The site is within Wetland Management Zone 1 as identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection.
- It is reported that individuals and animals that died of anthrax and other contagious diseases are buried on site.
- Instead of the preferred Strategic Environmental Assessment, the Environmental Impact Assessment process has been initiated and this Department has commented on the Final Scoping Report on the 24th of April 2014 (attached as Annexure J: Final Scoping Report in the application);
- The Departments comments are attached here as **Annexure A** for your ease of reference. Comments made by the Department include the following:
 - The Health Assessment and Risk Study must be conducted. It must include the location of identified graves, causes of death and expert opinion on soil and/or groundwater contamination including buffer requirements.
 - The proposal to relocate Sizwe Hospital to Edenvale Hospital must be explored further. It must be confirmed whether there is a buffer required around the hospital for the current operations due to the nature of illnesses that are treated.
 - Other studies including the Fauna and Flora, Wetland Delineation and Geo-hydrological Assessment must be conducted and included in the Environmental Impact Report.
- Studies included in the application are as follows:
 - Annexure K: Final Report on Phase 1 Geotechnical Site Investigation;
 - Annexure L: Bulk Civil Engineering Service Report;
 - Annexure M: Bulk Electrical Statement; and
 - Annexure N: Traffic Impact Assessment.
- The 'Developmental Precincts' identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the open space must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways. The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City.
- The application has identified two strategies for stormwater management including attenuation of accumulated stormwater in the Jukskei River, and attenuation of stormwater before draining into Jukskei River (Annexure L). While it is regarded as entirely premature to be discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are NOT supported by this Department and are **STRONGLY OPPOSED**. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer.
- It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional

Signature

Date

support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environment, Infrastructure Services Department (see Annexure B for details).

- The application makes reference to the provision and upgrading of associated infrastructures such as sewage line, water supply, and electricity supply including a substation and roads among others. These activities are likely to pose detrimental environmental impacts on the receiving environment; therefore, they need to be assessed thoroughly in the Environmental Impact Assessment Report.
- The Greater Linksfield Mixed Inclusionary Development has been divided into eight townships and this Department has received all eight separate Township Establishment applications (Sunningdale Extension 13 – 20) for comments.

Specific findings (Sunningdale Extension 17):

- Sunningdale Extension 17 is proposed to have six erven where four erven will be zoned "Residential 4" (for dwelling units, residential buildings, places of public worship, places of instruction, public open space, private open space, public and private roads, municipal, retail, shops, places of refreshment, offices, special buildings and public garage) measuring 16.10 ha, two erven will be zoned "Private Open Space" (5.43 ha) and "Public Streets" measuring 5.19 ha.
- This township occupies the western portion of the greater development and measures 25.72ha.
- The north-eastern and western side of the proposed development is affected by the 1:100 year floodline associated to the tributary of the Jukskei River.
- In terms of the map there is a 40m wide street proposed to cross the tributary of the Jukskei River and its associated wetland and 1:100 year floodline in order to connect this township with Sunningdale Extension 15. There is also a 32m wide street proposed to cross the same tributary just on the northern edge of this township. Club Street also crosses the same tributary at the western edge of the township. This is not in line with the City of Johannesburg Catchment Management Policy and Section 28 of NEMA.
- There is a pedestrian bridge on Erf 29 (Annexure O).
- The proposed layout plan (Annexure O and P) indicates that the 30m buffer required in terms of the City of Johannesburg Catchment Management Policy has been calculated from the wetland layer instead of the 1:100 year floodline where it is greater than the wetland delineation. The proposed layout also appears to assume the standard wetland or riparian zone buffers of 30 m. In the absence of detailed fauna and flora studies, it is not possible to determine the final width of the buffers, which may require to be increased on the basis of biodiversity issues. Critical drainage pressures in the sub region may also warrant the imposition of increased riparian buffers for hydrological protection. The Health Assessment and Risk Study will also determine whether any buffers are required around the hospital and the cemetery.
- Parts of the site are affected by illegal dumping.
- There is a 'rocky' area within the 1:100 year floodline where the road crossing is proposed. The Fauna and Flora study to be done as part of the EIA Study must indicate what 'rocky' means with respect to environmental sensitivities. The Bulk Civil Engineering Services Report or relevant study must indicate whether blasting will be required and impact must be addressed in the EIA. Erfen 29 and 30 are zoned Private Open Space and will be used as parks.
- The Geotechnical survey classifies the site as zone 2 and 3. A summary of the Geotechnical zones has been given on the attached draft layout plan: SUNNING_17LayD2014.03.12.
- The adjacent proposed Erf 5 Sunningdale Extension 14, Private Open Space, consist of cemeteries that are likely to be covering bodies that died of contagious diseases.

Comments:

- In terms of City of Johannesburg Catchment Management Policy no development activity will be supported within the 30m buffer of the delineated wetland and certified 1:100 year

floodline, whichever is the greatest. Therefore, the layout plan needs to be amended in line with this.

- All the areas within the 30m buffer of the delineated wetland and certified 1:100 year floodline, whichever is the greatest must be zoned Public Open Space. The purpose of these areas is conservation and not recreational. The areas are also linked to a wider open space system which is zoned public open space to the north and south of the property. Current and future climate change considerations require that open spaces be provided to serve for uses including biodiversity and flood protection.
- All proposed infrastructure must be designed to be resilient to climate change considerations. This includes the design of bridges to facilitate water flow and the relocation of sewers pipes, where upgrades to larger pipes are proposed, to outside the 1:100 year floodline and delineated wetland.
- In addition to conservation and protection of sensitive natural open space areas, provision would need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of this Department. No public open space contributions will be accepted in lieu of parkland
- The Open Space Framework proposes that a standard of 2,4 ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open spaces such as protected areas, high sensitivity vegetation and ridges or wetlands and associated buffers.
- This Department does not support multiple crossing of water bodies. There is a great need to revise the layout plan to accommodate this concern.
- The outcomes of all the Specialist Studies proposed in the Final Scoping Report must be used to generate a composite sensitivity map that will inform the layout plan of the proposed township. Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment (not yet compiled and considered in the current layout) and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003).
- All services related specialist studies/reports must be included and evaluated in the EIA report. The EIA must also show all existing servitudes/services and proposed upgrades including servitudes and confirm whether all listed activities have been applied for.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.

Having considered the above factors it is evident that the proposed development has detrimental impacts that will affect the receiving environment. Since the EIA process is underway. The outcome of the Specialist Studies (some of which have not yet been compiled considered, may have spatial implications for the proposal. The Department objects to the application and is of the opinion that **this application must be pended until the EIA process is finalised.**

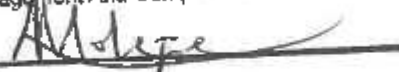
Should you have any queries or require any further information, please do not hesitate to contact me.

Yours sincerely,

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature

Date


21/07/2014

Lebo Molefe

Acting Unit Head: Impact Management and Compliance Monitoring

Tel: 011 587 4205

Fax: 086 627 7516

ANNEXURE A

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature



Date

21/07/2014

ANNEXURE B

Annexure B is a list of the names of the members of the committee who have been appointed to the various committees of the Council of the University of the South Africa.

The names of the members of the committee who have been appointed to the various committees of the Council of the University of the South Africa are as follows:



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Date: 25/04/2014

Lizelle Gregory
Bokamoso Landscape Architects and Environmental Consultants
P.O.Box 11375
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0161

Lizelleg@nwweb.co.za

Dear Madam

SCOPING REPORT FOR THE PROPOSED MIXED USE DEVELOPMENT ON PORTIONS 87, 148, 149 AND THE REMAINDER OF PORTION 1 OF THE FARM RIETFontein 61-IR: GAUT: 002/13-14/E0153

The Draft and Final Scoping Reports dated December 2013 and February 2014 received from Bokamoso Landscape Architects and Environmental Consultants has reference.

Description of the project

The application is for the Environmental Authorisation from the Gauteng Department of Agriculture and Rural Development in accordance with NEMA EIA Regulations, 2010. The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures on Portions 87, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.

The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital and specializes in the treatment of Tuberculosis, HIV testing and counselling and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation. The subject property is zoned "Agricultural" subject to conditions stated on page 21 of the Scoping Report.

Guidelines, By-laws, Precinct Plans, Policies and Environmental Management Frameworks:

In terms of EIA Regulations, 2010, the proposed activity is listed in all three listing notices and requires Environmental Authorisation prior to the commencement. Fully fledged EIA is required for this kind of development.

The Sub Area 28 of the 2010-2011 Region E RSDF is a large, relatively underutilised Sub Area and is one of the last remaining open tracts in the City of Johannesburg. It is the location of critical public health institutions. It aims amongst other things to reinforce this area as an institutional node focusing on the medical field and to promote residential development, particularly low income residential development.

Although the RSDF promotes the development of this area, it also appeals for the protection of the sensitive environmental attributes such as the Jukskei River and its tributaries as well as the associated wetlands and floodlines.

Description of alternatives

The submitted Draft and Final Scoping Reports has identified adequate alternatives for executing the proposed activity. These include the No-Go, Land Use, Services, Locality and Layout alternatives. However, section 6 of the Scoping Report has prematurely ruled off some identified alternatives without assessing them i.e. section 6.2.2: Residential development.

Description and assessment of the identified environmental issues

The submitted report in Section 10 and the attached plan of study has identified and assessed a number of environmental issues including but not limited to biophysical and socio-economic impacts of the proposed development during construction and operational phases. The methodology for assessing the identified issues has been outlined in the report and is satisfactory.

Geology and Soils

The site is underlain by mafic and granitic rocks and it is not underlain by dolomitic bedrock. Stability investigation of the site is not necessary. The soils of the site pose geotechnical constraints that warrant precautionary foundation measures due to the following:

- Collapsible soil horizons in the residual granitic soil
- Perched water tables that may form on the bedrock and pedogenic horizon interface with the overlying soils with possible surface seepage zones on the lower slopes and next to the drainage channels
- Difficult excavation conditions due to shallow bedrock
- Higher runoff and surface ponding due to low infiltration

The detailed Geotechnical report will be compiled and submitted with comments from the Council of Geosciences as part of the EIR. The Geotechnical engineer will confirm the presence of hazardous waste covered under the ground, if any.

Hydrology

The proposed site is affected by both 1:50 and 1:100 year floodlines. The Jukskei River floodplain and its tributaries as well as valley bottom wetland systems flows or occur on the site. The channels of both the Jukskei River and its tributaries are significantly degraded due to increased stormwater runoff, historical agricultural activities, historical infrastructure development, and failed human interventions in controlling erosion. Significant engineering intervention is required to stabilise the banks.

Two small wetlands identified on site are said to be disturbed but they can be rehabilitated and kept as open spaces. Therefore, detailed wetland delineation, assessment and protection measures as well as stormwater management plan must be submitted with the EIR. This will help to alleviate possible adverse impacts on the integrity and sustainability of the wetlands.

Topography

The natural drainage system will have to transfer the arrival of additional stormwater faster. The change in development hydrology and stormwater attenuation is essential in order to offset the

potential unfavourable impacts of post development. The topographical characteristics have a negative effect on the development potential of the site. The stormwater management plan must take cognizance of the topography of the site.

Climate

Wet summer conditions may make construction and environmental rehabilitation very difficult whereas dry and windy conditions may exacerbate dust pollution. Climatic conditions need to be taken into consideration when scheduling construction works on site.

Fauna and Flora

The site is ecologically sensitive since it has the primary vegetation, rivers and wetland accommodating Red listed mammals, Red listed plants, Orange listed plants, invertebrates and birds. The proposed activity is likely to have adverse detrimental impacts on biodiversity and ecosystems on site and off site as well. Therefore, a detailed Fauna and Flora survey, including a specialist biodiversity studies, will be done and reports submitted as part of the EIR.

Heritage

Buildings and infrastructure representing all periods from 1890 to modern times forming part of the Hospital Complex occur on site. Three cemetery sites were identified and the possibility of more burial sites or graves is still to be investigated. The relocation of Sizwe Hospital is a concern. A full heritage report must be submitted as part of the EIR where the comments from SAHRA must be addressed.

Land pollution and Infectious Diseases

The site is general a vacant open space perceived to be contaminated due to the excessive dumping of rubbish and potential hazardous waste related to the cemeteries on site. The various graves are associated with the Sizwe Hospital established to treat infectious diseases. Those who died of these infections were buried on this site. It is reported that animals that died of anthrax were also buried on the site. It is crucial to conduct a detailed assessment of the site to establish the location of the graves and their treatment. There is also a need to conduct a detailed soil and water analysis to determine the presence of spore/ pathogens/ viruses and the threat/ risk to humans during construction and occupation. The outcomes of these studies must be included in the EIR.

Agricultural Potential

The agricultural potential of the site ranges from high to very low. The proposed development is likely to take away soils with high potential for agricultural productivity. In this regard the applicant may consider conducting a thorough agricultural potential of the land in order to incorporate agricultural activities into the proposal such that food security and food safety in the region can be attained at the same time.

Land use

Although the site is located in an area characterized as residential area with many complimentary business operations, it is mostly vacant and undeveloped with the exception of approximately 25ha occupied by the hospital complex, cemeteries and personnel accommodation. The proposed activity includes among others the residential, retail, offices, light industrial, educational, medical facilities, hotels and conference facilities. A needs assessment and economic impact assessment will be conducted and the report attached to the EIR.

Visual Impact

The proposed activity is likely to have adverse visual impact since and therefore lead to the loss of "sense of place". A detailed visual impact assessment must be conducted and mitigation measures supplied during EIA. Architectural guidelines must be based on the mitigation measures. Cultural and historical features that contribute to the "sense of place" must be identified. Aesthetic areas must be identified. The reports must be attached to the EIR.

Noise Impact

The development is likely to have adverse noise impact on the surrounding residents. Therefore, noise impact assessment must be conducted in order to come up with mitigation measures. The report and mitigation measures should be submitted with the EIR.

Light pollution

Street and security lighting may have negative impacts on the eyes of the oncoming traffic and residents if not properly installed. Mitigation measures must be investigated during EIA process and included in the EIR.

Air quality

Atmospheric pollution is likely to occur during construction phase, especially due dust and infectious diseases. Dust suppression techniques such as sprinkling the construction site regularly water and dust nets may mitigate the impacts to the ambient levels.

Demography

Population statistics are very crucial to ascertain the need and viability of a development of this magnitude. Motivations in this regard will be attached to the EIR.

Bulk services

Upgrades and new water and sewer infrastructure would be required to service the proposed development. The combination of Bruma outfall and the diversion of Iliondale pump station to the Modderfontein outfall will provide sufficient capacity. Where the pipelines cross water courses, appropriate licenses will be sought. Detailed assessment and recommendations for adequate services must be included in the EIA report.

Stormwater has a significant influence on site development methodology. A Stormwater Master Plan has been compiled. Detention facilities are proposed to be utilized during design storm occurrences in order to contribute to the ecological wellbeing of the riverine systems. All external stormwater pipes and channels must be indicated on the plans. Details of the properties that would be affected by the Stormwater Management Plan must be provided including the servitudes to be registered.

The existing underground and overhead bulk electricity network would supply the required electricity to this development. Johannesburg City Power has indicated that there should be enough capacity from the underground network even though there might be a need to supply from several 11kV circuits which are yet to be identified. The developer may be required to construct a switching station in line with Johannesburg City Power's specifications and standards. The position of the switching station is yet to be finalized. Details of the properties that would be affected by the proposed electricity upgrad must be provided including the servitudes to be registered.

The alternative energy sources such as gas, solar water heating and solar energy for streets and area lighting would be used in the proposed development. Gas will be supplied from the Egoli Gas High Pressure Pump Station at 5 Edward Avenue in Sandringham and it alignment will follow existing roads to the edge of the development site.

The waste management aspect is not clear in terms of who will remove what kind waste and dispose them off where and how? Therefore, a confirmation on who will handle domestic and industrial waste must be provided in the EIR. Details of relevant landfill sites where the waste will be disposed must be provided as well as the capacity confirmation.

Traffic

The proposed development is in close proximity to the airports, rail, bus rapid transit and freeways. Major roads around the site will be upgraded and other roads are proposed within the development. The site is accessible through the N3/Linksfield Road interchange and

N3/Modderfontein Road interchange. The entire transportation and traffic impact investigation must be included in the EIA report.

Public Participation Process

This process is very crucial in the EIA process. The public will be given another opportunity to raise their views about the proposed activity during EIA phase. The issues and comments raised will be included in the EIR.

Recommendations

This Department is of the opinion that, looking at the nature and magnitude of this activity and associated impacts on the surrounding ecological and socio-economic environment, the following issues must be addressed in the Environmental Impact Assessment Report:

- The identified alternatives must be assessed comparatively in order to come up with the best suitable alternatives (proposals) and mitigation measures that are project and site specific.
- Specialist studies to determine the locality, extent and proper management of the sensitive environmental features as per the discussion above must be conducted as stipulated in the Draft and Final Scoping Reports' Section 10 and accompanying Plan of Study (Annexure D). These are necessary in order to minimize adverse impacts on the environment and to ensure that the natural environment is adequately streamlined into the proposed development and the benefits thereof are fully realized.
- Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003).
- The Draft and Final Scoping Reports on page 2 indicated the possibility of the occurrence of graves on site where people and/or animals that died from infectious diseases were buried. A detailed investigation into this (health assessment and risk study) must be conducted by a suitably qualified specialist. The Department of Health (at all spheres of government including the medical institutions in the surrounding area), and Johannesburg City Parks must be given an opportunity to comment on this report prior to the submission of the EIA report.
- In the process of engaging the Department of Health and the medical facilities in the area, there are crucial issues that must be addressed. Those issues include the type of treatment offered, risks, buffers required, and the relocation of Sizwe Hospital among others.
- The Health Assessment and Risk study must include but not only limited to the location of grave, number of graves, list of causes of death, indication on whether humans or animals are buried in such grave, compatible land uses, expert opinion on soil and/or ground water contamination including buffer requirements. The results of the study must be review independently.
- Upon completion of the studies, a composite sensitivity map overlaid with the proposed development land uses must also be submitted with the EIA report. The map must be legible.
- All the issues raised by the interested and/or affected parties must be considered and addressed, including the issue of the alternative that was proposed a number of year back for the property to be used for a 'medical park.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.
- The layout plan must further avoid the roads that cross the sensitive areas.
- All services reports must be included and evaluated in the EIA report.

Should you have any queries or require any further information, please do not hesitate to contact the Department.

Kind regards.



Linda Kuhn

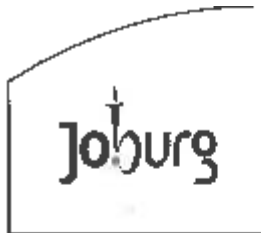
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CC: Simon Mafu

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INTERNAL MEMO

TO : Mr T Tshimange

CC : Mr L Nevuthalu

FROM : Jane Eagle

YOUR REF : PROPOSED SUNNINGDALE EXT 18

DATE : 25 June 2014

Reference is made to the application for the establishment of a township – proposed Sunningdale Ext 18 on a part of Rem of Portion 1, Ptn 137, Ptn 138 and Ptn 149 Rietfontein 61 IR. It is further understood that this is but one of a number of townships making up what is referred to by the applicant as the Linksfield Mixed Use Inclusionary Development comprising 8 proposed townships, proposed Extensions 13 to 20, on amongst others, Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR, measuring approximately 271,57 ha. The proposed actual development area measures approximately 194,99 ha in extent. The property is zoned "Agricultural" subject to conditions.

General:

In regard to the proposed township application, there are a number of procedural aspects which are of concern and need to be addressed.

Firstly, for a site of such environmental sensitivity, it is unacceptable and premature for the township establishment process to be so far advanced and comments sought prior to the completion of critical environmental studies as part of an Environmental Impact Assessment. In the absence of certain essential specialist environmental studies, any comments from an environmental perspective can only be limited and based on general site attributes. This is contrary to the spirit of NEMA which holds all decision making authorities and regulators accountable to consideration of NEMA principles in their decision making processes. It is regarded as entirely premature to be requested to provide comments on the town planning application when certain critical environmental specialist studies have not been completed.

In our view the application remains incomplete without the availability of the specialist studies, and cannot be properly assessed from an environmental perspective.

Secondly, it is questionable why the development is being considered as a number of discrete townships, rather than on a holistic basis for an integrated development. The environmental sensitivities and importance of the overall site comprising all proposed townships, as highlighted below, underscore the need for any development proposals to be considered in an integral manner, taking cognizance of the total site proposed for development, and of the development framework for the larger site as a whole. The correct process for consideration of a site of this sensitivity and extent would be a Strategic Environmental Assessment. This should ideally precede any environmental authorization issues.

Biodiversity

Notwithstanding, it should be noted that the major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 1 (CBA1), and some lesser portions being classified as Critical Biodiversity Area 2 (CBA 2).

The applicant's own specialist report confirms the environmental importance and sensitivities of the site.

The layout for the wider site appears to completely disregard these sensitivities or biodiversity aspects in favour of development, with a minimum buffer proposed on a very constrained riparian zone. In the absence of the detailed fauna and flora studies to inform otherwise, important biodiversity sites, in particular those classified as CBAs, should be excluded from the development areas and conserved as environmentally sensitive areas.

Further, the 'Developmental Precincts' identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the open space must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways. The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City. The proposed layout also appears to assume the standard wetland or riparian zone buffers of 30 m. In the absence of detailed fauna and flora studies, it is not possible to determine the final width of the buffers, which may require to be increased on the basis of biodiversity issues. Critical drainage pressures in the sub region may also warrant the imposition of increased riparian buffers for hydrological protection.

Glaringly absent in the motivation memorandum is any acknowledgement of how the proposal in any way serves the needs of the environment or sustainability and biodiversity protection, or the planning objectives of Sub Area 28, in particular the recommended interventions "To Protect the quality and integrity of the environment". While the report has acknowledged this objective, there is nothing in the proposed layout and overall development approach to suggest that anything more than lip service has been paid to this aspiration. It is in fact disingenuous for the report to cite a principle such as "Emphasis will be placed on quality public space, pedestrian environment, public parks and **protection of biodiversity areas** when in fact the **proposed layout implies the large scale loss of areas designated as Critical Biodiversity Areas.**

Biodiversity conservation aspects and ecological linkages are barely acknowledged in the proposed development approach and layout which fails to address a number of findings from the applicant's own specialist findings for the scoping phase, as well as various COJ policies and approved planning tools such as the COJ Wetland Protection and Management Plan, which highlight Modderfontein as having one of the most important wetland systems from a biodiversity perspective. The site now under consideration is a critical link area between open space areas and refuges on Huddle Park, and the greater Modderfontein area. The preliminary assessment undertaken by Bokamoso Landscape Architects and Environmental Consultants underscores the conservation importance of this site, identified a number of environmental sensitivities and conservation features identified as "Irreplaceable" in terms of the Gauteng C Plan, including:

- Habitat for Red listed mammals
- Habitat for Red listed plants
- Orange listed plant habitat
- PPrimary vegetation
- Rivers and wetland
- Invertebrates, and
- Bird Life.

The report further highlights the likely impacts as inter alia

- Loss of sensitive grassland areas
- Possible red data flora and fauna species,
- Sensitive vegetation
- Loss of habitat
- Loss of movement corridor and lack of open space links.

The proposed layout does not appear to have made any attempt to deal with these issues, merely providing for a narrow riparian corridor, most of which is proposed as recreational parks for residents of the proposed development.

The proposed amended layout both appear to overlook these important conservation areas and make provision only for the protection of a narrowly defined, minimum wetland and riparian zone through the development.

Wetland protection and management

Both the original layout and the proposed amended layout do identify wetland areas associated with the watercourses that traverse the site. While the extent of wetlands does not necessarily preclude development on the entire site, the development would have to comply with the provisions of the approved COJ Catchment Management Policy be adhered to i.e. That the riparian zone/wetland and associated buffer zone of 30 metres from the outer edge of the wetland temporary zone be designated as sensitive and no development be permitted within such wetland and buffer zone or within the 1:100 year floodline, whichever is the greatest. In addition, the hydrological linkages and dependencies also need to be properly understood and protected within any development of the site. Given that the valley bottom wetland forms part of a continuous open space system it is required that this area be designated as sensitive and conserved in a manner which protects its ecological functions. As indicated, it is possible that increased buffers may be warranted for the site due to biodiversity, habitat and hydrological imperatives.

Even the applicant's own geotechnical report confirms the expected geotechnical constraints for the sites as being:

- Collapsible soil
- Seasonal shallow groundwater, perched groundwater and surface seepage near the floodplain,
- Moderate erodability of surficial soils and
- localised difficulty of excavation to 1.5 m depth

Further, the site is within Wetland Management Zone 1 as identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection. In terms of key management concerns for Wetland Management Zone 1, management of sediments and water quality are both identified as key, while pre-emptive engineering is advocated whereby sufficient space is maintained for the systems to adjust with little active intervention to the changes in hydrology or that active engineering is applied so as to ensure that wetland management objectives are met.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Storm Water Management

In regard to the two options proposed for the management of stormwater and drainage associated with the proposed development, while it is regarded as entirely premature to be

discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are NOT supported by this unit and are STRONGLY OPPOSED. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer, and the following conditions would apply:

A storm water management plan will need to be submitted for the approval by both the Johannesburg Roads Agency and Environmental Management prior to the approval of the final Site Development Plan, and will be required to implement a storm water management scheme to meet the following criteria/standards:

Peak discharge - no increase in discharge for any event of any duration up to the 25 year RI event

Volume of runoff - no increase up to the annual 10 year rainfall

Runoff frequency - no surface runoff for the 1 yr RI event of any duration

Water Quality - no deterioration

Space allocation for storm water management must be indicated on the site development plan, outside of the wetland and wetland buffer areas or any environmentally sensitive areas. NO in-stream attenuation measures will be considered acceptable.

The storm water management plan should in any event minimize the generation of surface runoff and storm water through adopting the principles of Water Sensitive Urban Design (WSUDS) and Sustainable Urban Drainage Systems (SUDS) which provide various options such as bio-retention ponds, enhanced swales and grass lined channels, stone filled infiltration ditches, permeable paving etc. in order to minimize surface runoff and to maintain water quality.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Open Space Provision

In addition to conservation and protection of sensitive natural open space areas, provision would need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of the Environmental Management Department of COJ. No public open space contributions will be accepted in lieu of parkland

The Open Space Framework proposes that a standard of 2,4 ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open spaces such as protected areas high sensitivity vegetation and ridges or wetlands and associated buffers.

Land Use / Zonings

As stated above, it is considered entirely premature to be considering the town planning application prior to the availability of final detailed specialist environmental studies. Notwithstanding, should the principle of development of parts of the site be approved, consideration should be given to the recommendations of the draft Bio Regional Plan for Johannesburg and to the COJ Open Space Framework in regard to those land uses which are

appropriate to areas immediately adjacent to important biodiversity areas or sensitive environmental sites. This should be taken into account in terms of land use, detailed layouts, densities and typologies.

Layout

It is our view that consideration of the township should not be proceeded with until all the necessary detailed environmental specialist studies are available and a sound Strategic Environmental Assessment approach has been followed to inform any development approach for such an environmentally sensitive site which should inform the basic principles of any development approach and ensure that the interests of environmental sustainability and biodiversity protection have been adequately addressed and considered. It is our considered opinion that the current approach of fragmented township applications does not meet the requirements for holistic and sustainable development approach to such a precious site within the City and that the township applications are premature.

In light of the above, this division cannot support the proposed township or associated layout until the concerns and environmental issues highlighted above have been resolved.

Should you require further clarity on any of the above issues, please do not hesitate to contact me.

Regards

Jane Eagle
Assistant Director: Open Space Planning
Environmental Management

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UNIT : IMPACT MANAGEMENT AND COMPLIANCE MONITORING

INTERNAL MEMO

TO : Ben Pretorius

FROM : Tshilidzi Tshimange

YOUR REF : 08-14208

DATE : 21 July 2014

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature

Date

APPLICATION: TOWNSHIP ESTABLISHMENT

PROPERTY DESCRIPTION: SUNNINGDALE EXTENSION 16

The application is for the establishment of a mixed use development on a part of Re Portion 1, Portion 137, Portion 138 and Portion 149 Rietfontein 61-IR.

We have examined this application in terms of the following environmental criteria:

- Location;
- Surrounding land uses;
- Proximity to conservation areas and areas of ecological importance;
- Alignment to environmental standards, legislation and policies including:
 - National Environment Management Act (Act 107 of 1998) as amended (NEMA) and Environmental Impact Assessment Regulations, 2010
 - City of Johannesburg Catchment Management Policy, 2008
 - Johannesburg Metropolitan Open Space Systems, 2008
- City of Johannesburg GIS layers including Wetland Audits, Streams and Rivers, 1:100 year floodlines, and Biodiversity Sector Plan; and
- The reviewed Final Scoping Report (also included in the application).

General findings (Sunningdale Extensions 13 – 20 / Linksfield Mixed Use Inclusionary Development):

- The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures among others on Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.
- The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital that specializes in the treatment of Tuberculosis, HIV testing and counselling

and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation.

- The subject property is zoned "Agricultural" subject to conditions stated on Page 21 of the Final Scoping Report attached in this application as Annexure J.
- In terms of the City of Johannesburg GIS layers the site is affected by Channelled Valley Bottom Wetlands, the Jukskei River and its tributaries, 1:100 year floodlines and Critical Biodiversity Areas. This has been confirmed in the application.
- The major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 1 (CBA1), and some lesser portions being classified as Critical Biodiversity Area 2 (CBA 2).
- The site is within Wetland Management Zone 1 as identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection.
- It is reported that individuals and animals that died of anthrax and other contagious diseases are buried on site.
- Instead of the preferred Strategic Environmental Assessment, the Environmental Impact Assessment process has been initiated and this Department has commented on the Final Scoping Report on the 24th of April 2014 (attached as Annexure J: Final Scoping Report in the application).

The Departments comments are attached here as **Annexure A** for your ease of reference. Comments made by the Department include the following:

- The Health Assessment and Risk Study must be conducted. It must include the location of identified graves, causes of death and expert opinion on soil and/or groundwater contamination including buffer requirements.
- The proposal to relocate Sizwe Hospital to Edenvale Hospital must be explored further. It must be confirmed whether there is a buffer required around the hospital for the current operations due to the nature of illnesses that are treated.
- Other studies including the Fauna and Flora, Wetland Delineation and Geo-hydrological Assessment must be conducted and included in the Environmental Impact Report.

Studies included in the application are as follows:

- Annexure K: Final Report on Phase 1 Geotechnical Site Investigation;
- Annexure L: Bulk Civil Engineering Service Report;
- Annexure M: Bulk Electrical Statement; and
- Annexure N: Traffic Impact Assessment.

- The "Developmental Precincts" identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the open space must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways. The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City.
- The application has identified two strategies for stormwater management including attenuation of accumulated stormwater in the Jukskei River, and attenuation of stormwater before draining into Jukskei River (Annexure L). While it is regarded as entirely premature to be discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are NOT supported by this Department and are **STRONGLY OPPOSED**. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer.

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature

Date

- It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environment, Infrastructure Services Department (see Annexure B for details).
- The application makes reference to the provision and upgrading of associated infrastructures such as sewage line, water supply, and electricity supply including a substation and roads among others. These activities are likely to pose detrimental environmental impacts on the receiving environment; therefore, they need to be assessed thoroughly in the Environmental Impact Assessment Report.
- The Greater Linksfield Mixed Inclusionary Development has been divided into eight townships and this Department has received all eight separate Township Establishment applications (Sunningdale Extension 13 – 20) for comments.

Specific findings (Sunningdale Extension 16):

- Sunningdale Extension 16 is proposed to have six erven, where one erf (0.75ha) will be zoned "Special" (for dwelling houses block or blocks of flats (at a maximum density of 160u/Ha), residential buildings, institutional uses, educational uses, shops, offices, place of public worship, place of amusement, showrooms, motor related and commercial, public street, private open space including such supportive uses), two erven (5.97ha) will be zoned "Commercial" (for commercial uses as per scheme, motor related uses, offices, self-storage units and public), two erven measuring 5.97ha will be zoned "Business 1" (for shops, offices, retail and business park, warehouse and distribution, business buildings, professional rooms, places of amusement, social hall, residential building except on ground floor) and one erf (5.44ha) will be zoned "Private Open Space" for a Park.
This township occupies the eastern portion of the greater development and measures 27.37ha in extent. The area between Erven 26 and 27 of the proposed development is affected by the 1:100 year floodline and wetland associated to the Jukskei River and its tributaries.
Erf 33 is zoned Private Open Space and will be used as a park.
The proposed layout plan (Annexure O and P) indicates that the 30m buffer required in terms of the City of Johannesburg Catchment Management Policy has been calculated from the wetland layer to the north and south of the watercourse instead of the calculation from the 1:100 year floodline to the south of the watercourse, as it is greater than the delineated wetland. The proposed layout assumes the standard wetland or riparian zone buffers of 30 m. In the absence of detailed Fauna and Flora studies, it is not possible to determine the final width of the buffers, which may require to be increased on the basis of biodiversity issues. Critical drainage pressures in the sub region may also warrant the imposition of increased riparian buffers for hydrological protection. The Health Assessment and Risk Study will also determine whether any buffers are required around the hospital and the cemetery.
- There is a 'rocky' area within the watercourse. The Fauna and Flora study to be done as part of the EIA Study must indicate what 'rocky' means with respect to environmental sensitivities. The Geotechnical survey classifies the site as zone 1, 2 and 3. A summary of the Geotechnical zones has been given on the attached draft layout plan: SUNNING_16LayD2014.03.11.

Comments:

- In terms of City of Johannesburg Catchment Management Policy no development activity will be supported within the 30m buffer of the delineated wetland and certified 1:100 year floodline, whichever is the greatest. Therefore, the layout plan needs to be amended in line with this.
- All the areas within the 30m buffer of the delineated wetland and certified 1:100 year floodline, whichever is the greatest must be zoned Public Open Space.

- The purpose of these areas is conservation and not recreational. The areas are also linked to a wider open space system which is zoned public open space to the north and south of the property. Current and future climate change considerations require that open spaces be provided to serve for uses including biodiversity and flood protection.
- All proposed infrastructure must be designed to be resilient to climate change considerations. This includes the design of bridges to facilitate water flow and the relocation of sewers pipes, where upgrades to larger pipes are proposed, to outside the 1:100 year floodline and delineated wetland.
- In addition to conservation and protection of sensitive natural open space areas, provision would need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of this Department. No public open space contributions will be accepted in lieu of parkland
- The Open Space Framework proposes that a standard of 2,4 ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open spaces such as protected areas high sensitivity vegetation and ridges or wetlands and associated buffers.
- This Department does not support multiple crossing of water bodies. There is a great need to revise the layout plan to accommodate this concern.
- The outcomes of all the specialist studies proposed in the plan of study must be used to generate a composite sensitivity map that will inform the layout plan of the proposed township. Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003).
- All services related specialist studies/reports must be included and evaluated in the EIA report. The EIA must also show all existing servitudes/services and proposed upgrades including servitudes and confirm whether all listed activities have been applied for.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.

Having considered the above factors it is evident that the proposed development has numerous detrimental impacts that will affect the receiving environment. Since the EIA process is underway. The outcome of the Specialist Studies, some of which have not yet been compiled considered, may have spatial implications for the proposal. The Department objects to the application and is of the opinion that **this application must be pended until the EIA process is finalised.**

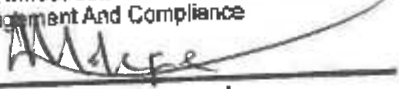
Should you have any queries or require any further information, please do not hesitate to contact me.

Yours sincerely,

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature

Date


21/09/2014

Lebo Molefe

Acting Unit Head: Impact Management and Compliance Monitoring

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ANNEXURE A

Infrastructure and Services Department
Project Management and Compliance
Signature M. J. [Signature]
Date 21/07/2014

ANNEXURE B

THE ...
...
...
...



a world class African city

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Our Ref: TT/EIM/14/02/2014
Contact: Tshilidzi Tshimange
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Date: 25/04/2014

Lizelle Gregory
Bokamoso Landscape Architects and Environmental Consultants
P.O.Box 11375
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Lizelleg@nwweb.co.za

Dear Madam

SCOPING REPORT FOR THE PROPOSED MIXED USE DEVELOPMENT ON PORTIONS 87, 148, 149 AND THE REMAINDER OF PORTION 1 OF THE FARM RIETFontein 61-IR: GAUT: 002/13-14/E0153

The Draft and Final Scoping Reports dated December 2013 and February 2014 received from Bokamoso Landscape Architects and Environmental Consultants has reference.

Description of the project

The application is for the Environmental Authorisation from the Gauteng Department of Agriculture and Rural Development in accordance with NEMA EIA Regulations, 2010. The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures on Portions 87, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.

The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital and specializes in the treatment of Tuberculosis, HIV testing and counselling and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation. The subject property is zoned "Agricultural" subject to conditions stated on page 21 of the Scoping Report.

Guidelines, By-laws, Precinct Plans, Policies and Environmental Management Frameworks:

In terms of EIA Regulations, 2010, the proposed activity is listed in all three listing notices and requires Environmental Authorisation prior to the commencement. Fully fledged EIA is required for this kind of development.

The Sub Area 28 of the 2010-2011 Region E RSDF is a large, relatively underutilised Sub Area and is one of the last remaining open tracts in the City of Johannesburg. It is the location of critical public health institutions. It aims amongst other things to reinforce this area as an institutional node focusing on the medical field and to promote residential development, particularly low income residential development.

Although the RSDF promotes the development of this area, it also appeals for the protection of the sensitive environmental attributes such as the Jukskei River and its tributaries as well as the associated wetlands and floodlines.

Description of alternatives

The submitted Draft and Final Scoping Reports has identified adequate alternatives for executing the proposed activity. These include the No-Go, Land Use, Services, Locality and Layout alternatives. However, section 6 of the Scoping Report has prematurely ruled off some identified alternatives without assessing them i.e. section 6.2.2: Residential development.

Description and assessment of the identified environmental issues

The submitted report in Section 10 and the attached plan of study has identified and assessed a number of environmental issues including but not limited to biophysical and socio-economic impacts of the proposed development during construction and operational phases. The methodology for assessing the identified issues has been outlined in the report and is satisfactory.

Geology and Soils

The site is underlain by mafic and granitic rocks and it is not underlain by dolomitic bedrock. Stability investigation of the site is not necessary. The soils of the site pose geotechnical constraints that warrant precautionary foundation measures due to the following:

- Collapsible soil horizons in the residual granitic soil
- Perched water tables that may form on the bedrock and pedogenic horizon interface with the overlying soils with possible surface seepage zones on the lower slopes and next to the drainage channels
- Difficult excavation conditions due to shallow bedrock
- Higher runoff and surface ponding due to low infiltration

The detailed Geotechnical report will be compiled and submitted with comments from the Council of Geosciences as part of the EIR. The Geotechnical engineer will confirm the presence of hazardous waste covered under the ground, if any.

Hydrology

The proposed site is affected by both 1:50 and 1:100 year floodlines. The Jukskei River floodplain and its tributaries as well as valley bottom wetland systems flows or occur on the site. The channels of both the Jukskei River and its tributaries are significantly degraded due to increased stormwater runoff, historical agricultural activities, historical infrastructure development, and failed human interventions in controlling erosion. Significant engineering intervention is required to stabilise the banks.

Two small wetlands identified on site are said to be disturbed but they can be rehabilitated and kept as open spaces. Therefore, detailed wetland delineation, assessment and protection measures as well as stormwater management plan must be submitted with the EIR. This will help to alleviate possible adverse impacts on the integrity and sustainability of the wetlands.

Topography

The natural drainage system will have to transfer the arrival of additional stormwater faster. The change in development hydrology and stormwater attenuation is essential in order to offset the

potential unfavourable impacts of post development. The topographical characteristics have a negative effect on the development potential of the site. The stormwater management plan must take cognizance of the topography of the site.

Climate

Wet summer conditions may make construction and environmental rehabilitation very difficult whereas dry and windy conditions may exacerbate dust pollution. Climatic conditions need to be taken into consideration when scheduling construction works on site.

Fauna and Flora

The site is ecologically sensitive since it has the primary vegetation, rivers and wetland accommodating Red listed mammals, Red listed plants, Orange listed plants, invertebrates and birds. The proposed activity is likely to have adverse detrimental impacts on biodiversity and ecosystems on site and off site as well. Therefore, a detailed Fauna and Flora survey, including a specialist biodiversity studies, will be done and reports submitted as part of the EIR.

Heritage

Buildings and infrastructure representing all periods from 1890 to modern times forming part of the Hospital Complex occur on site. Three cemetery sites were identified and the possibility of more burial sites or graves is still to be investigated. The relocation of Sizwe Hospital is a concern. A full heritage report must be submitted as part of the EIR where the comments from SAHRA must be addressed.

Land pollution and Infectious Diseases

The site is general a vacant open space perceived to be contaminated due to the excessive dumping of rubbish and potential hazardous waste related to the cemeteries on site. The various graves are associated with the Sizwe Hospital established to treat infectious diseases. Those who died of these infections were buried on this site. It is reported that animals that died of anthrax were also buried on the site. It is crucial to conduct a detailed assessment of the site to establish the location of the graves and their treatment. There is also a need to conduct a detailed soil and water analysis to determine the presence of spore/ pathogens/ viruses and the threat/ risk to humans during construction and occupation. The outcomes of these studies must be included in the EIR.

Agricultural Potential

The agricultural potential of the site ranges from high to very low. The proposed development is likely to take away soils with high potential for agricultural productivity. In this regard the applicant may consider conducting a thorough agricultural potential of the land in order to incorporate agricultural activities into the proposal such that food security and food safety in the region can be attained at the same time.

Land use

Although the site is located in an area characterized as residential area with many complimentary business operations, it is mostly vacant and undeveloped with the exception of approximately 25ha occupied by the hospital complex, cemeteries and personnel accommodation. The proposed activity includes among others the residential, retail, offices, light industrial, educational, medical facilities, hotels and conference facilities. A needs assessment and economic impact assessment will be conducted and the report attached to the EIR.

Visual Impact

The proposed activity is likely to have adverse visual impact since and therefore lead to the loss of "sense of place". A detailed visual impact assessment must be conducted and mitigation measures supplied during EIA. Architectural guidelines must be based on the mitigation measures. Cultural and historical features that contribute to the "sense of place" must be identified. Aesthetic areas must be identified. The reports must be attached to the EIR.

Noise Impact

The development is likely to have adverse noise impact on the surrounding residents. Therefore, noise impact assessment must be conducted in order to come up with mitigation measures. The report and mitigation measures should be submitted with the EIR.

Light pollution

Street and security lighting may have negative impacts on the eyes of the oncoming traffic and residents if not properly installed. Mitigation measures must be investigated during EIA process and included in the EIR.

Air quality

Atmospheric pollution is likely to occur during construction phase, especially due dust and infectious diseases. Dust suppression techniques such as sprinkling the construction site regularly water and dust nets may mitigate the impacts to the ambient levels.

Demography

Population statistics are very crucial to ascertain the need and viability of a development of this magnitude. Motivations in this regard will be attached to the EIR.

Bulk services

Upgrades and new water and sewer infrastructure would be required to service the proposed development. The combination of Bruma outfall and the diversion of Iliondale pump station to the Modderfontein outfall will provide sufficient capacity. Where the pipelines cross water courses, appropriate licenses will be sought. Detailed assessment and recommendations for adequate services must be included in the EIA report.

Stormwater has a significant influence on site development methodology. A Stormwater Master Plan has been compiled. Detention facilities are proposed to be utilized during design storm occurrences in order to contribute to the ecological wellbeing of the riverine systems. All external stormwater pipes and channels must be indicated on the plans. Details of the properties that would be affected by the Stormwater Management Plan must be provided including the servitudes to be registered.

The existing underground and overhead bulk electricity network would supply the required electricity to this development. Johannesburg City Power has indicated that there should be enough capacity from the underground network even though there might be a need to supply from several 11kV circuits which are yet to be identified. The developer may be required to construct a switching station in line with Johannesburg City Power's specifications and standards. The position of the switching station is yet to be finalized. Details of the properties that would be affected by the proposed electricity upgrad must be provided including the servitudes to be registered.

The alternative energy sources such as gas, solar water heating and solar energy for streets and area lighting would be used in the proposed development. Gas will be supplied from the Egoli Gas High Pressure Pump Station at 5 Edward Avenue in Sandringham and it alignment will follow existing roads to the edge of the development site.

The waste management aspect is not clear in terms of who will remove what kind waste and dispose them off where and how? Therefore, a confirmation on who will handle domestic and industrial waste must be provided in the EIR. Details of relevant landfill sites where the waste will be disposed must be provided as well as the capacity confirmation.

Traffic

The proposed development is in close proximity to the airports, rail, bus rapid transit and freeways. Major roads around the site will be upgraded and other roads are proposed within the development. The site is accessible through the N3/Linksfield Road interchange and

N3/Modderfontein Road interchange. The entire transportation and traffic impact investigation must be included in the EIA report.

Public Participation Process

This process is very crucial in the EIA process. The public will be given another opportunity to raise their views about the proposed activity during EIA phase. The issues and comments raised will be included in the EIR.

Recommendations

This Department is of the opinion that, looking at the nature and magnitude of this activity and associated impacts on the surrounding ecological and socio-economic environment, the following issues must be addressed in the Environmental Impact Assessment Report:

- The identified alternatives must be assessed comparatively in order to come up with the best suitable alternatives (proposals) and mitigation measures that are project and site specific.
- Specialist studies to determine the locality, extent and proper management of the sensitive environmental features as per the discussion above must be conducted as stipulated in the Draft and Final Scoping Reports' Section 10 and accompanying Plan of Study (Annexure D). These are necessary in order to minimize adverse impacts on the environment and to ensure that the natural environment is adequately streamlined into the proposed development and the benefits thereof are fully realized.
- Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003).
- The Draft and Final Scoping Reports on page 2 indicated the possibility of the occurrence of graves on site where people and/or animals that died from infectious diseases were buried. A detailed investigation into this (health assessment and risk study) must be conducted by a suitably qualified specialist. The Department of Health (at all spheres of government including the medical institutions in the surrounding area), and Johannesburg City Parks must be given an opportunity to comment on this report prior to the submission of the EIA report.
- In the process of engaging the Department of Health and the medical facilities in the area, there are crucial issues that must be addressed. Those issues include the type of treatment offered, risks, buffers required, and the relocation of Sizwe Hospital among others.
- The Health Assessment and Risk study must include but not only limited to the location of grave, number of graves, list of causes of death, indication on whether humans or animals are buried in such grave, compatible land uses, expert opinion on soil and/or ground water contamination including buffer requirements. The results of the study must be reviewed independently.
- Upon completion of the studies, a composite sensitivity map overlaid with the proposed development land uses must also be submitted with the EIA report. The map must be legible.
- All the issues raised by the interested and/or affected parties must be considered and addressed, including the issue of the alternative that was proposed a number of years back for the property to be used for a 'medical park'.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.
- The layout plan must further avoid the roads that cross the sensitive areas.
- All services reports must be included and evaluated in the EIA report.

Should you have any queries or require any further information, please do not hesitate to contact the Department.

Kind regards,



Linda Kuhn

Acting Unith Head: Impact Management and Compliance Monitoring

Tel: 011 587 4205

Fax: 086 627 7516

CC: Simon Mafu

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INTERNAL MEMO

TO : Mr T Tshimange
CC : Mr L. Nevuthalu
FROM : Jane Eagle
YOUR REF : PROPOSED SUNNINGDALE EXT 18
DATE : 25 June 2014

Reference is made to the application for the establishment of a township – proposed Sunningdale Ext 18 on a part of Rem of Portion 1, Ptn 137, Ptn 138 and Ptn 149 Rietfontein 61 IR. It is further understood that this is but one of a number of townships making up what is referred to by the applicant as the Linksfield Mixed Use Inclusionary Development comprising 8 proposed townships, proposed Extensions 13 to 20, on amongst others, Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR, measuring approximately 271,57 ha. The proposed actual development area measures approximately 194,99 ha in extent. The property is zoned "Agricultural" subject to conditions.

General:

In regard to the proposed township application, there are a number of procedural aspects which are of concern and need to be addressed.

Firstly, for a site of such environmental sensitivity, it is unacceptable and premature for the township establishment process to be so far advanced and comments sought prior to the completion of critical environmental studies as part of an Environmental Impact Assessment. In the absence of certain essential specialist environmental studies, any comments from an environmental perspective can only be limited and based on general site attributes. This is contrary to the spirit of NEMA which holds all decision making authorities and regulators accountable to consideration of NEMA principles in their decision making processes. It is regarded as entirely premature to be requested to provide comments on the town planning application when certain critical environmental specialist studies have not been completed.

In our view the application remains incomplete without the availability of the specialist studies, and cannot be properly assessed from an environmental perspective.

Secondly, it is questionable why the development is being considered as a number of discrete townships, rather than on a holistic basis for an integrated development. The environmental sensitivities and importance of the overall site comprising all proposed townships, as highlighted below, underscore the need for any development proposals to be considered in an integral manner, taking cognizance of the total site proposed for development, and of the development framework for the larger site as a whole. The correct process for consideration of a site of this sensitivity and extent would be a Strategic Environmental Assessment. This should ideally precede any environmental authorization issues.

Biodiversity

Notwithstanding, it should be noted that the major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 1 (CBA1), and some lesser portions being classified as Critical Biodiversity Area 2 (CBA 2).

The applicant's own specialist report confirms the environmental importance and sensitivities of the site.

The layout for the wider site appears to completely disregard these sensitivities or biodiversity aspects in favour of development, with a minimum buffer proposed on a very constrained riparian zone. In the absence of the detailed fauna and flora studies to inform otherwise, important biodiversity sites, in particular those classified as CBAs, should be excluded from the development areas and conserved as environmentally sensitive areas.

Further, the 'Developmental Precincts' identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the open space must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways. The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City. The proposed layout also appears to assume the standard wetland or riparian zone buffers of 30 m. In the absence of detailed fauna and flora studies, it is not possible to determine the final width of the buffers, which may require to be increased on the basis of biodiversity issues. Critical drainage pressures in the sub region may also warrant the imposition of increased riparian buffers for hydrological protection.

Glaringly absent in the motivation memorandum is any acknowledgement of how the proposal in any way serves the needs of the environment or sustainability and biodiversity protection, or the planning objectives of Sub Area 28, in particular the recommended interventions "To Protect the quality and integrity of the environment". While the report has acknowledged this objective, there is nothing in the proposed layout and overall development approach to suggest that anything more than lip service has been paid to this aspiration. It is in fact disingenuous for the report to cite a principle such as "Emphasis will be placed on quality public space, pedestrian environment, public parks and protection of biodiversity areas when in fact the proposed layout implies the large scale loss of areas designated as Critical Biodiversity Areas.

Biodiversity conservation aspects and ecological linkages are barely acknowledged in the proposed development approach and layout which fails to address a number of findings from the applicant's own specialist findings for the scoping phase, as well as various COJ policies and approved planning tools such as the COJ Wetland Protection and Management Plan, which highlight Modderfontein as having one of the most important wetland systems from a biodiversity perspective. The site now under consideration is a critical link area between open space areas and refuges on Huddle Park, and the greater Modderfontein area. The preliminary assessment undertaken by Bokamoso Landscape Architects and Environmental Consultants underscores the conservation importance of this site, identified a number of environmental sensitivities and conservation features identified as 'Irreplaceable' in terms of the Gauteng C Plan, including:

- Habitat for Red listed mammals
- Habitat for Red listed plants
- Orange listed plant habitat
- PPrimary vegetation
- Rivers and wetland
- Invertebrates, and
- Bird Life.

The report further highlights the likely impacts as inter alia

- Loss of sensitive grassland areas
- Possible red data flora and fauna species,
- Sensitive vegetation
- Loss of habitat
- Loss of movement corridor and lack of open space links.

The proposed layout does not appear to have made any attempt to deal with these issues, merely providing for a narrow riparian corridor, most of which is proposed as recreational parks for residents of the proposed development.

The proposed amended layout both appear to overlook these important conservation areas and make provision only for the protection of a narrowly defined, minimum wetland and riparian zone through the development.

Wetland protection and management

Both the original layout and the proposed amended layout do identify wetland areas associated with the watercourses that traverse the site. While the extent of wetlands does not necessarily preclude development on the entire site, the development would have to comply with the provisions of the approved COJ Catchment Management Policy be adhered to i.e. That the riparian zone/wetland and associated buffer zone of 30 metres from the outer edge of the wetland temporary zone be designated as sensitive and no development be permitted within such wetland and buffer zone or within the 1:100 year floodline, whichever is the greatest. In addition, the hydrological linkages and dependencies also need to be properly understood and protected within any development of the site. Given that the valley bottom wetland forms part of a continuous open space system it is required that this area be designated as sensitive and conserved in a manner which protects its ecological functions. As indicated, it is possible that increased buffers may be warranted for the site due to biodiversity, habitat and hydrological imperatives.

Even the applicant's own geotechnical report confirms the expected geotechnical constraints for the sites as being:

- Collapsible soil
- Seasonal shallow groundwater, perched groundwater and surface seepage near the floodplain,
- Moderate erodability of surficial soils and
- Localised difficulty of excavation to 1.5 m depth

Further, the site is within Wetland Management Zone 1 as identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection. In terms of key management concerns for Wetland Management Zone 1, management of sediments and water quality are both identified as key, while pre-emptive engineering is advocated whereby sufficient space is maintained for the systems to adjust with little active intervention to the changes in hydrology or that active engineering is applied so as to ensure that wetland management objectives are met.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Storm Water Management

In regard to the two options proposed for the management of stormwater and drainage associated with the proposed development, while it is regarded as entirely premature to be

discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are NOT supported by this unit and are **STRONGLY OPPOSED**. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer, and the following conditions would apply:

A storm water management plan will need to be submitted for the approval by both the Johannesburg Roads Agency and Environmental Management prior to the approval of the final Site Development Plan, and will be required to implement a storm water management scheme to meet the following criteria/standards:

Peak discharge - no increase in discharge for any event of any duration up to the 25 year RI event

Volume of runoff - no increase up to the annual 10 year rainfall

Runoff frequency - no surface runoff for the 1 yr RI event of any duration

Water Quality - no deterioration

Space allocation for storm water management must be indicated on the site development plan, outside of the wetland and wetland buffer areas or any environmentally sensitive areas. NO in-stream attenuation measures will be considered acceptable.

The storm water management plan should in any event minimize the generation of surface runoff and storm water through adopting the principles of Water Sensitive Urban Design (WSUDS) and Sustainable Urban Drainage Systems (SUDS) which provide various options such as bio-retention ponds, enhanced swales and grass lined channels, stone filled infiltration ditches, permeable paving etc. in order to minimize surface runoff and to maintain water quality.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Open Space Provision

In addition to conservation and protection of sensitive natural open space areas, provision would need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of the Environmental Management Department of COJ. No public open space contributions will be accepted in lieu of parkland

The Open Space Framework proposes that a standard of 2,4 ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open spaces such as protected areas high sensitivity vegetation and ridges or wetlands and associated buffers.

Land Use / Zonings

As stated above, it is considered entirely premature to be considering the town planning application prior to the availability of final detailed specialist environmental studies. Notwithstanding, should the principle of development of parts of the site be approved, consideration should be given to the recommendations of the draft Bio Regional Plan for Johannesburg and to the COJ Open Space Framework in regard to those land uses which are

appropriate to areas immediately adjacent to important biodiversity areas or sensitive environmental sites. This should be taken into account in terms of land use, detailed layouts, densities and typologies.

Layout

It is our view that consideration of the township should not be proceeded with until all the necessary detailed environmental specialist studies are available and a sound Strategic Environmental Assessment approach has been followed to inform any development approach for such an environmentally sensitive site which should inform the basic principles of any development approach and ensure that the interests of environmental sustainability and biodiversity protection have been adequately addressed and considered. It is our considered opinion that the current approach of fragmented township applications does not meet the requirements for holistic and sustainable development approach to such a precious site within the City and that the township applications are premature.

In light of the above, this division cannot support the proposed township or associated layout until the concerns and environmental issues highlighted above have been resolved.

Should you require further clarity on any of the above issues, please do not hesitate to contact me.

Regards

Jane Eagle
Assistant Director: Open Space Planning
Environmental Management

Tel: 587 4271
Fax: 5874273
Cell: 0824142431



UNIT : IMPACT MANAGEMENT AND COMPLIANCE MONITORING

INTERNAL MEMO

TO : Ben Pretorius
FROM : Tshilidzi Tshimange
YOUR REF : 08-14207
DATE : 21 July 2014

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature

Date

[Handwritten Signature]
21/07/2014

APPLICATION: TOWNSHIP ESTABLISHMENT

PROPERTY DESCRIPTION: SUNNINGDALE EXTENSION 15

The application is for the establishment of a mixed use development.

We have examined this application in terms of the following environmental criteria:

- Location;
- Surrounding land uses;
- Proximity to conservation areas and areas of ecological importance;
- Alignment to environmental standards, legislation and policies including:
 - National Environment Management Act (Act 107 of 1998) as amended (NEMA) and Environmental Impact Assessment Regulations, 2010
 - City of Johannesburg Catchment Management Policy, 2008
 - Johannesburg Metropolitan Open Space Systems, 2008
- City of Johannesburg GIS layers including Wetland Audits, Streams and Rivers, 1:100 year floodlines, and Biodiversity Sector Plan; and
- The reviewed Final Scoping Report (also included in the application).

General findings (Sunningdale Extensions 13 – 20 / Linksfield Mixed Use Inclusionary Development):

- The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures among others on Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.
- The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital that specializes in the treatment of Tuberculosis, HIV testing and counselling and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation.

- The subject property is zoned "Agricultural" subject to conditions stated on Page 21 of the Final Scoping Report attached in this application as Annexure J.
- In terms of the City of Johannesburg GIS layers the site is affected by Channelled Valley Bottom Wetlands, the Jukskei River and its tributaries, 1:100 year floodlines and Critical Biodiversity Areas. This has been confirmed in the application.
- The major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 1 (CBA1), and some lesser portions being classified as Critical Biodiversity Area 2 (CBA 2).
- The site is within Wetland Management Zone 1 as Identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection.
- It is reported that individuals and animals that died of anthrax and other contagious diseases were buried on site.
- Instead of the preferred Strategic Environmental Assessment, the Environmental Impact Assessment process has been initiated and this Department has commented on the Final Scoping Report on the 24th of April 2014 (attached as Annexure J: Final Scoping Report in the application). The comments are attached here as **Annexure A** for your ease of reference.

- Comments made by the Department include the following:
 - The Health Assessment and Risk study must be conducted and include the location of identified graves, causes of death and expert opinion on soil and/or groundwater contamination including buffer requirements.
 - The proposal to relocate Sizwe Hospital to Edenvale Hospital must be explored further. It must be confirmed whether there is a buffer required around the hospital for the current operations due to the nature of illnesses that are treated.
 - Other studies including the Fauna and Flora, Wetland Delineation and Geohydrological Assessment must be conducted and Included in the Environmental Impact Report.

Studies included in the application are as follows:

- Annexure J: Environmental Impact Assessment Report
 - Annexure K: Final Report on Phase 1 Geotechnical Site Investigation
 - Annexure L: Bulk Civil Engineering Service Report
 - Annexure M: Bulk Electrical Statement
 - Annexure N: Traffic Impact Assessment
- The 'Developmental Precincts' identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the open space must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways. The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City.
 - The application has identified two strategies for stormwater management including attenuation of accumulated stormwater in the Jukskei River, and attenuation of stormwater before draining into Jukskei River (Annexure L). While it is regarded as entirely premature to be discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are NOT supported by this Department and are **STRONGLY OPPOSED**. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer.

Signature _____ Date 21/07/2014

- It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environment, Infrastructure Services Department (see Annexure B for details).
- The application makes reference to the provision and upgrading of associated infrastructures such as sewage line, water supply, and electricity supply including a substation and roads among others. These activities are likely to pose detrimental environmental impacts on the receiving environment; therefore, they need to be assessed thoroughly in the Environmental Impact Assessment Report.
- The Greater Linksfield Mixed Inclusionary Development has been divided into eight townships and this Department has received all eight separate Township Establishment applications (Sunningdale Extension 13 – 20) for comments.

Specific findings (Sunningdale Extension 15):

- Sunningdale Extension 15 consists of five erven as follows:
 - Two erven (8.50ha) will be zoned "Residential 4" (for dwelling units, residential buildings, places of public worship, places of instruction, public open space, private open space, public and private roads, municipal, retail, shops, places of refreshment, offices, special buildings and public garage),
 - One erf (9.50ha) will be zoned "Special" (for dwelling houses block or blocks of flats (at a maximum density of 160u/Ha), residential buildings, institutional uses, educational uses, shops, offices, place of public worship, place of amusement, showrooms, motor related and commercial, public street, private open space including such supportive uses, and
 - Two erven 95.78ha) will be zoned "Private Open Space".
- This township occupies the north-western portion of the greater development and measures 27.61ha in extent.
- The north-eastern and eastern side of the proposed development is affected by the 1:100 year floodline and wetland associated to the tributary of the Jukskei River Erf 28).
- Erven 28 and 36 are zoned Private Open Space and will be used as parks.
- In terms of the map there are multiple road crossings proposed including the pedestrian bridge. This is not in line with the City of Johannesburg Catchment Management Policy and Section 28 of NEMA.
- The proposed layout plan (Annexure O and P) indicates that the 30m buffer required in terms of the City of Johannesburg Catchment Management Policy has been calculated from the wetland layer instead of the 1:100 year floodline as is the greater of the two. The proposed layout assumes the standard wetland or riparian zone buffers of 30 m. In the absence of detailed Fauna and Flora studies, it is not possible to determine the final width of the buffers, which may require to be increased on the basis of biodiversity issues. Critical drainage pressures in the sub region may also warrant the imposition of increased riparian buffers for hydrological protection. The Health Assessment and Risk Study will also determine whether any buffers are required around the hospital and the cemetery.
- The Geotechnical survey classifies the site as zone 1 and 3. A summary of the Geotechnical zones has been given on the attached draft layout plan: SUNNING_17LayD2014.03.07.

Comments:

Having considered the above factors it is evident that the proposed development has numerous detrimental impacts that will affect the receiving environment. Since the EIA process is underway. The outcome of the Specialist Studies, some of which have not yet been compiled considered, may have spatial implications for the proposal. The Department objects to the

application and is of the opinion that **this application must be pended until the EIA process is finalised.**

Other comments:

- In terms of City of Johannesburg Catchment Management Policy no development activity will be supported within the 30m buffer of the delineated wetland and certified 1:100 year floodline, whichever is the greatest. Therefore, the layout plan needs to be amended in line with this.
- All the areas within the 30m buffer of the delineated wetland and certified 1:100 year floodline, whichever is the greatest must be zoned Public Open Space. The purpose of these areas is conservation and not recreational. The areas are also linked to a wider open space system which is zoned public open space to the north and south of the property. Current and future climate change considerations require that open spaces be provided to serve for uses including biodiversity and flood protection.
- All proposed infrastructure must be designed to be resilient to climate change considerations. This includes the design of bridges to facilitate water flow and the relocation of sewers pipes, where upgrades to larger pipes are proposed, to outside the 1:100 year floodline and delineated wetland.
- In addition to conservation and protection of sensitive natural open space areas, provision would need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of this Department. No public open space contributions will be accepted in lieu of parkland
- The Open Space Framework proposes that a standard of 2,4ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open spaces such as protected areas high sensitivity vegetation and ridges or wetlands and associated buffers.
- This Department does not support multiple crossing of water bodies. There is a great need to revise the layout plan to accommodate this concern.
- The outcomes of all the Specialist Studies proposed in the Final Scoping Report must be used to generate a composite sensitivity map that will inform the layout plan of the proposed township. Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment (not yet compiled and considered in the current layout) and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003).
- All services related specialist studies/reports must be included and evaluated in the EIA report. The EIA must also show all existing servitudes/services and proposed upgrades including servitudes and confirm whether all listed activities have been applied for.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.

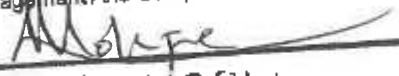
Should you have any queries or require any further information, please do not hesitate to contact me.

Yours sincerely,

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature

Date


24/07/2014

Lebo Molefe

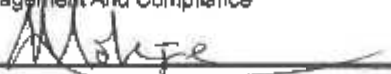
Acting Unit Head: Impact Management and Compliance Monitoring

Tel: 011 587 4205

Fax: 086 627 7516

ANNEXURE A

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature 
Date 21/07/2014

ANNEXURE B



a world class African city

City of Johannesburg
Environment Infrastructure and services Department

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Our Ref: TT/EiM/14/02/2014
Contact: Tshilidzi Tshimange
CoJ Region: E
Tel: 011 587 4236
Fax: 086 627 7516
Date: 25/04/2014

Lizelle Gregory
Bokamoso Landscape Architects and Environmental Consultants
P.O.Box 11375
Maroelana
0161

Lizelleg@nwweb.co.za

Dear Madam:

SCOPING REPORT FOR THE PROPOSED MIXED USE DEVELOPMENT ON PORTIONS 87, 148, 149 AND THE REMAINDER OF PORTION 1 OF THE FARM RIETFontein 61-IR: GAUT: 002/13-14/E0153

The Draft and Final Scoping Reports dated December 2013 and February 2014 received from Bokamoso Landscape Architects and Environmental Consultants has reference.

Description of the project

The application is for the Environmental Authorisation from the Gauteng Department of Agriculture and Rural Development in accordance with NEMA EIA Regulations, 2010. The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures on Portions 87, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.

The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital and specializes in the treatment of Tuberculosis, HIV testing and counselling and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation. The subject property is zoned "Agricultural" subject to conditions stated on page 21 of the Scoping Report.

Guidelines, By-laws, Precinct Plans, Policies and Environmental Management Frameworks:

In terms of EIA Regulations, 2010, the proposed activity is listed in all three listing notices and requires Environmental Authorisation prior to the commencement. Fully fledged EIA is required for this kind of development.

The Sub Area 28 of the 2010-2011 Region E RSDF is a large, relatively underutilised Sub Area and is one of the last remaining open tracts in the City of Johannesburg. It is the location of critical public health institutions. It aims amongst other things to reinforce this area as an institutional node focusing on the medical field and to promote residential development, particularly low income residential development.

Although the RSDF promotes the development of this area, it also appeals for the protection of the sensitive environmental attributes such as the Jukskei River and its tributaries as well as the associated wetlands and floodlines.

Description of alternatives

The submitted Draft and Final Scoping Reports has identified adequate alternatives for executing the proposed activity. These include the No-Go, Land Use, Services, Locality and Layout alternatives. However, section 6 of the Scoping Report has prematurely ruled off some identified alternatives without assessing them i.e. section 6.2.2: Residential development.

Description and assessment of the identified environmental issues

The submitted report in Section 10 and the attached plan of study has identified and assessed a number of environmental issues including but not limited to biophysical and socio-economic impacts of the proposed development during construction and operational phases. The methodology for assessing the identified issues has been outlined in the report and is satisfactory.

Geology and Soils

The site is underlain by mafic and granitic rocks and it is not underlain by dolomitic bedrock. Stability investigation of the site is not necessary. The soils of the site pose geotechnical constraints that warrant precautionary foundation measures due to the following:

- Collapsible soil horizons in the residual granitic soil
- Perched water tables that may form on the bedrock and pedogenic horizon interface with the overlying soils with possible surface seepage zones on the lower slopes and next to the drainage channels
- Difficult excavation conditions due to shallow bedrock
- Higher runoff and surface ponding due to low infiltration

The detailed Geotechnical report will be compiled and submitted with comments from the Council of Geosciences as part of the EIR. The Geotechnical engineer will confirm the presence of hazardous waste covered under the ground, if any.

Hydrology

The proposed site is affected by both 1:50 and 1:100 year floodlines. The Jukskei River floodplain and its tributaries as well as valley bottom wetland systems flows or occur on the site. The channels of both the Jukskei River and its tributaries are significantly degraded due to increased stormwater runoff, historical agricultural activities, historical infrastructure development, and failed human interventions in controlling erosion. Significant engineering intervention is required to stabilise the banks.

Two small wetlands identified on site are said to be disturbed but they can be rehabilitated and kept as open spaces. Therefore, detailed wetland delineation, assessment and protection measures as well as stormwater management plan must be submitted with the EIR. This will help to alleviate possible adverse impacts on the integrity and sustainability of the wetlands.

Topography

The natural drainage system will have to transfer the arrival of additional stormwater faster. The change in development hydrology and stormwater attenuation is essential in order to offset the

potential unfavourable impacts of post development. The topographical characteristics have a negative effect on the development potential of the site. The stormwater management plan must take cognizance of the topography of the site.

Climate

Wet summer conditions may make construction and environmental rehabilitation very difficult whereas dry and windy conditions may exacerbate dust pollution. Climatic conditions need to be taken into consideration when scheduling construction works on site.

Fauna and Flora

The site is ecologically sensitive since it has the primary vegetation, rivers and wetland accommodating Red listed mammals, Red listed plants, Orange listed plants, invertebrates and birds. The proposed activity is likely to have adverse detrimental impacts on biodiversity and ecosystems on site and off site as well. Therefore, a detailed Fauna and Flora survey, including a specialist biodiversity studies, will be done and reports submitted as part of the EIR.

Heritage

Buildings and infrastructure representing all periods from 1890 to modern times forming part of the Hospital Complex occur on site. Three cemetery sites were identified and the possibility of more burial sites or graves is still to be investigated. The relocation of Sizwe Hospital is a concern. A full heritage report must be submitted as part of the EIR where the comments from SAHRA must be addressed.

Land pollution and Infectious Diseases

The site is general a vacant open space perceived to be contaminated due to the excessive dumping of rubbish and potential hazardous waste related to the cemeteries on site. The various graves are associated with the Sizwe Hospital established to treat infectious diseases. Those who died of these infections were buried on this site. It is reported that animals that died of anthrax were also buried on the site. It is crucial to conduct a detailed assessment of the site to establish the location of the graves and their treatment. There is also a need to conduct a detailed soil and water analysis to determine the presence of spore/ pathogens/ viruses and the threat/ risk to humans during construction and occupation. The outcomes of these studies must be included in the EIR.

Agricultural Potential

The agricultural potential of the site ranges from high to very low. The proposed development is likely to take away soils with high potential for agricultural productivity. In this regard the applicant may consider conducting a thorough agricultural potential of the land in order to incorporate agricultural activities into the proposal such that food security and food safety in the region can be attained at the same time.

Land use

Although the site is located in an area characterized as residential area with many complimentary business operations, it is mostly vacant and undeveloped with the exception of approximately 25ha occupied by the hospital complex, cemeteries and personnel accommodation. The proposed activity includes among others the residential, retail, offices, light industrial, educational, medical facilities, hotels and conference facilities. A needs assessment and economic impact assessment will be conducted and the report attached to the EIR.

Visual impact

The proposed activity is likely to have adverse visual impact since and therefore lead to the loss of "sense of place". A detailed visual impact assessment must be conducted and mitigation measures supplied during EIA. Architectural guidelines must be based on the mitigation measures. Cultural and historical features that contribute to the "sense of place" must be identified. Aesthetic areas must be identified. The reports must be attached to the EIR.

Noise Impact

The development is likely to have adverse noise impact on the surrounding residents. Therefore, noise impact assessment must be conducted in order to come up with mitigation measures. The report and mitigation measures should be submitted with the EIR.

Light pollution

Street and security lighting may have negative impacts on the eyes of the oncoming traffic and residents if not properly installed. Mitigation measures must be investigated during EIA process and included in the EIR.

Air quality

Atmospheric pollution is likely to occur during construction phase, especially due dust and infectious diseases. Dust suppression techniques such as sprinkling the construction site regularly water and dust nets may mitigate the impacts to the ambient levels.

Demography

Population statistics are very crucial to ascertain the need and viability of a development of this magnitude. Motivations in this regard will be attached to the EIR.

Bulk services

Upgrades and new water and sewer infrastructure would be required to service the proposed development. The combination of Bruma outfall and the diversion of Illiondale pump station to the Modderfontein outfall will provide sufficient capacity. Where the pipelines cross water courses, appropriate licenses will be sought. Detailed assessment and recommendations for adequate services must be included in the EIA report.

Stormwater has a significant influence on site development methodology. A Stormwater Master Plan has been compiled. Detention facilities are proposed to be utilized during design storm occurrences in order to contribute to the ecological wellbeing of the riverine systems. All external stormwater pipes and channels must be indicated on the plans. Details of the properties that would be affected by the Stormwater Management Plan must be provided including the servitudes to be registered.

The existing underground and overhead bulk electricity network would supply the required electricity to this development. Johannesburg City Power has indicated that there should be enough capacity from the underground network even though there might be a need to supply from several 11kV circuits which are yet to be identified. The developer may be required to construct a switching station in line with Johannesburg City Power's specifications and standards. The position of the switching station is yet to be finalized. Details of the properties that would be affected by the proposed electricity upgrad must be provided including the servitudes to be registered.

The alternative energy sources such as gas, solar water heating and solar energy for streets and area lighting would be used in the proposed development. Gas will be supplied from the Egoli Gas High Pressure Pump Station at 5 Edward Avenue in Sandringham and it alignment will follow existing roads to the edge of the development site.

The waste management aspect is not clear in terms of who will remove what kind waste and dispose them off where and how? Therefore, a confirmation on who will handle domestic and industrial waste must be provided in the EIR. Details of relevant landfill sites where the waste will be disposed must be provided as well as the capacity confirmation.

Traffic

The proposed development is in close proximity to the airports, rail, bus rapid transit and freeways. Major roads around the site will be upgraded and other roads are proposed within the development. The site is accessible through the N3/Linksfield Road interchange and

N3/Modderfontein Road interchange. The entire transportation and traffic impact investigation must be included in the EIA report.

Public Participation Process

This process is very crucial in the EIA process. The public will be given another opportunity to raise their views about the proposed activity during EIA phase. The issues and comments raised will be included in the EIR.

Recommendations

This Department is of the opinion that, looking at the nature and magnitude of this activity and associated impacts on the surrounding ecological and socio-economic environment, the following issues must be addressed in the Environmental Impact Assessment Report:

- The identified alternatives must be assessed comparatively in order to come up with the best suitable alternatives (proposals) and mitigation measures that are project and site specific.
- Specialist studies to determine the locality, extent and proper management of the sensitive environmental features as per the discussion above must be conducted as stipulated in the Draft and Final Scoping Reports' Section 10 and accompanying Plan of Study (Annexure D). These are necessary in order to minimize adverse impacts on the environment and to ensure that the natural environment is adequately streamlined into the proposed development and the benefits thereof are fully realized.
- Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003).
- The Draft and Final Scoping Reports on page 2 indicated the possibility of the occurrence of graves on site where people and/or animals that died from infectious diseases were buried. A detailed investigation into this (health assessment and risk study) must be conducted by a suitably qualified specialist. The Department of Health (at all spheres of government including the medical institutions in the surrounding area), and Johannesburg City Parks must be given an opportunity to comment on this report prior to the submission of the EIA report.
- In the process of engaging the Department of Health and the medical facilities in the area, there are crucial issues that must be addressed. Those issues include the type of treatment offered, risks, buffers required, and the relocation of Sizwe Hospital among others.
- The Health Assessment and Risk study must include but not only limited to the location of grave, number of graves, list of causes of death, Indication on whether humans or animals are buried in such grave, compatible land uses, expert opinion on soil and/or ground water contamination including buffer requirements. The results of the study must be reviewed independently.
- Upon completion of the studies, a composite sensitivity map overlaid with the proposed development land uses must also be submitted with the EIA report. The map must be legible.
- All the issues raised by the interested and/or affected parties must be considered and addressed, including the issue of the alternative that was proposed a number of years back for the property to be used for a 'medical park.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.
- The layout plan must further avoid the roads that cross the sensitive areas.
- All services reports must be included and evaluated in the EIA report.

Should you have any queries or require any further information, please do not hesitate to contact the Department.

Kind regards,



Linda Kuhn

Acting Unith Head: Impact Management and Compliance Monitoring

Tel: 011 587 4205

Fax: 086 627 7516

CC: Simon Mafu

Simon.Mafu@gauteng.gov.za



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INTERNAL MEMO

TO : Mr T Tshimange

CC : Mr L Nevuthalu

FROM : Jane Eagle

YOUR REF : PROPOSED SUNNINGDALE EXT 18

DATE : 25 June 2014

Reference is made to the application for the establishment of a township – proposed Sunningdale Ext 18 on a part of Rem of Portion 1, Ptn 137, Ptn 138 and Ptn 149 Rietfontein 61 IR. It is further understood that this is but one of a number of townships making up what is referred to by the applicant as the Linksfield Mixed Use Inclusionary Development comprising 8 proposed townships, proposed Extensions 13 to 20, on amongst others, Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR, measuring approximately 271,57 ha. The proposed actual development area measures approximately 194,98 ha in extent. The property is zoned "Agricultural" subject to conditions.

General:

In regard to the proposed township application, there are a number of procedural aspects which are of concern and need to be addressed.

Firstly, for a site of such environmental sensitivity, it is unacceptable and premature for the township establishment process to be so far advanced and comments sought prior to the completion of critical environmental studies as part of an Environmental Impact Assessment. In the absence of certain essential specialist environmental studies, any comments from an environmental perspective can only be limited and based on general site attributes. This is contrary to the spirit of NEMA which holds all decision making authorities and regulators accountable to consideration of NEMA principles in their decision making processes. It is regarded as entirely premature to be requested to provide comments on the town planning application when certain critical environmental specialist studies have not been completed.

In our view the application remains incomplete without the availability of the specialist studies, and cannot be properly assessed from an environmental perspective.

Secondly, it is questionable why the development is being considered as a number of discrete townships, rather than on a holistic basis for an integrated development. The environmental sensitivities and importance of the overall site comprising all proposed townships, as highlighted below, underscore the need for any development proposals to be considered in an integral manner, taking cognizance of the total site proposed for development, and of the development framework for the larger site as a whole. The correct process for consideration of a site of this sensitivity and extent would be a Strategic Environmental Assessment. This should ideally precede any environmental authorization issues.

It is an organisation registered with the Department of Labour and consists of one or more **Biodiversity** registered trade unions and one or more registered employer organisations (Quote internet

address). Bargaining normally takes place at the workplace level. Notwithstanding, it should be noted that the major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 1 (CBA1), and some lesser portions being classified as Critical Biodiversity Area 2 (CBA 2).

The applicant's own specialist report confirms the environmental importance and sensitivities of the site.

The layout for the wider site appears to completely disregard these sensitivities or biodiversity aspects in favour of development, with a minimum buffer proposed on a very constrained riparian zone. In the absence of the detailed fauna and flora studies to inform otherwise, important biodiversity sites, in particular those classified as CBAs, should be excluded from the development areas and conserved as environmentally sensitive areas.

Further, the 'Developmental Precincts' identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the open space must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways. The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City. The proposed layout also appears to assume the standard wetland or riparian zone buffers of 30 m. In the absence of detailed fauna and flora studies, it is not possible to determine the final width of the buffers, which may require to be increased on the basis of biodiversity issues. Critical drainage pressures in the sub region may also warrant the imposition of increased riparian buffers for hydrological protection.

Glaringly absent in the motivation memorandum is any acknowledgement of how the proposal in any way serves the needs of the environment or sustainability and biodiversity protection, or the planning objectives of Sub Area 28, in particular the recommended interventions "To Protect the quality and integrity of the environment". While the report has acknowledged this objective, there is nothing in the proposed layout and overall development approach to suggest that anything more than lip service has been paid to this aspiration. It is in fact disingenuous for the report to cite a principle such as "Emphasis will be placed on quality public space, pedestrian environment, public parks and protection of biodiversity areas when in fact the proposed layout implies the large scale loss of areas designated as Critical Biodiversity Areas.

Biodiversity conservation aspects and ecological linkages are barely acknowledged in the proposed development approach and layout which fails to address a number of findings from the applicant's own specialist findings for the scoping phase, as well as various COJ policies and approved planning tools such as the COJ Wetland Protection and Management Plan, which highlight Modderfontein as having one of the most important wetland systems from a biodiversity perspective. The site now under consideration is a critical link area between open space areas and refuges on Huddle Park, and the greater Modderfontein area. The preliminary assessment undertaken by Bokamoso Landscape Architects and Environmental Consultants underscores the conservation importance of this site, identified a number of environmental sensitivities and conservation features identified as 'Irreplaceable' in terms of the Gauteng C Plan, including:

- Habitat for Red listed mammals
- Habitat for Red listed plants
- Orange listed plant habitat
- PPrimary vegetation
- Rivers and wetland
- Invertebrates, and
- Bird Life.

The report further highlights the likely impacts as inter alia

- Loss of sensitive grassland areas
- Possible red data flora and fauna species,
- Sensitive vegetation
- Loss of habitat
- Loss of movement corridor and lack of open space links.

The proposed layout does not appear to have made any attempt to deal with these issues, merely providing for a narrow riparian corridor, most of which is proposed as recreational parks for residents of the proposed development.

The proposed amended layout both appear to overlook these important conservation areas and make provision only for the protection of a narrowly defined, minimum wetland and riparian zone through the development.

Wetland protection and management

Both the original layout and the proposed amended layout do identify wetland areas associated with the watercourses that traverse the site. While the extent of wetlands does not necessarily preclude development on the entire site, the development would have to comply with the provisions of the approved COJ Catchment Management Policy be adhered to i.e. That the riparian zone/wetland and associated buffer zone of 30 metres from the outer edge of the wetland temporary zone be designated as sensitive and no development be permitted within such wetland and buffer zone or within the 1:100 year floodline, whichever is the greatest. In addition, the hydrological linkages and dependencies also need to be properly understood and protected within any development of the site. Given that the valley bottom wetland forms part of a continuous open space system it is required that this area be designated as sensitive and conserved in a manner which protects its ecological functions. As indicated, it is possible that increased buffers may be warranted for the site due to biodiversity, habitat and hydrological imperatives.

Even the applicant's own geotechnical report confirms the expected geotechnical constraints for the sites as being:

- Collapsible soil
- Seasonal shallow groundwater, perched groundwater and surface seepage near the floodplain,
- Moderate erodability of surficial soils and
- localised difficulty of excavation to 1.5 m depth

Further, the site is within Wetland Management Zone 1 as identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection. In terms of key management concerns for Wetland Management Zone 1, management of sediments and water quality are both identified as key, while pre-emptive engineering is advocated whereby sufficient space is maintained for the systems to adjust with little active intervention to the changes in hydrology or that active engineering is applied so as to ensure that wetland management objectives are met.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Storm Water Management

In regard to the two options proposed for the management of stormwater and drainage associated with the proposed development, while it is regarded as entirely premature to be

discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are NOT supported by this unit and are STRONGLY OPPOSED. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer, and the following conditions would apply:

A storm water management plan will need to be submitted for the approval by both the Johannesburg Roads Agency and Environmental Management prior to the approval of the final Site Development Plan, and will be required to implement a storm water management scheme to meet the following criteria/standards:

- Peak discharge - no increase in discharge for any event of any duration up to the 25 year RI event
- Volume of runoff - no increase up to the annual 10 year rainfall
- Runoff frequency - no surface runoff for the 1 yr RI event of any duration
- Water Quality - no deterioration

Space allocation for storm water management must be indicated on the site development plan, outside of the wetland and wetland buffer areas or any environmentally sensitive areas. NO in-stream attenuation measures will be considered acceptable.

The storm water management plan should in any event minimize the generation of surface runoff and storm water through adopting the principles of Water Sensitive Urban Design (WSUDS) and Sustainable Urban Drainage Systems (SUDS) which provide various options such as bio-retention ponds, enhanced swales and grass lined channels, stone filled infiltration ditches, permeable paving etc. in order to minimize surface runoff and to maintain water quality.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Open Space Provision

In addition to conservation and protection of sensitive natural open space areas, provision would need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of the Environmental Management Department of COJ. No public open space contributions will be accepted in lieu of parkland

The Open Space Framework proposes that a standard of 2,4 ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open spaces such as protected areas high sensitivity vegetation and ridges or wetlands and associated buffers.

Land Use / Zonings

As stated above, it is considered entirely premature to be considering the town planning application prior to the availability of final detailed specialist environmental studies. Notwithstanding, should the principle of development of parts of the site be approved, consideration should be given to the recommendations of the draft Bio Regional Plan for Johannesburg and to the COJ Open Space Framework in regard to those land uses which are

appropriate to areas immediately adjacent to important biodiversity areas or sensitive environmental sites. This should be taken into account in terms of land use, detailed layouts, densities and typologies.

Layout

It is our view that consideration of the township should not be proceeded with until all the necessary detailed environmental specialist studies are available and a sound Strategic Environmental Assessment approach has been followed to inform any development approach for such an environmentally sensitive site which should inform the basic principles of any development approach and ensure that the interests of environmental sustainability and biodiversity protection have been adequately addressed and considered. It is our considered opinion that the current approach of fragmented township applications does not meet the requirements for holistic and sustainable development approach to such a precious site within the City and that the township applications are premature.

In light of the above, this division cannot support the proposed township or associated layout until the concerns and environmental issues highlighted above have been resolved.

Should you require further clarity on any of the above issues, please do not hesitate to contact me.

Regards

Jane Eagle
Assistant Director: Open Space Planning
Environmental Management

Tel: 587 4271
Fax: 5874273
Cell: 0824142431



UNIT : IMPACT MANAGEMENT AND COMPLIANCE MONITORING

INTERNAL MEMO

TO : Ben Pretorius

FROM : Tshilidzi Tshimange

YOUR REF : 08-14206

DATE : 21 July 2014

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature

Date

[Handwritten Signature]
21/07/2014

APPLICATION: TOWNSHIP ESTABLISHMENT

PROPERTY DESCRIPTION: SUNNINGDALE EXTENSION 14

The application is for the establishment of a mixed use development on a part of Re Portion 1, Portion 137, Portion 138 and Portion 149 Rietfontein 61-IR.

We have examined this application in terms of the following environmental criteria:

- Location;
- Surrounding land uses;
- Proximity to conservation areas and areas of ecological importance;
- Alignment to environmental standards, legislation and policies including:
 - National Environment Management Act (Act 107 of 1998) as amended (NEMA) and Environmental Impact Assessment Regulations, 2010
 - City of Johannesburg Catchment Management Policy, 2008
 - Johannesburg Metropolitan Open Space Systems, 2008
- City of Johannesburg GIS layers including Wetland Audits, Streams and Rivers, 1:100 year floodlines, and Biodiversity Sector Plan; and
- The reviewed Final Scoping Report (also included in the application).

General findings (Sunningdale Extensions 13 – 20 / Linksfield Mixed Use Inclusionary Development):

- The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures among others on Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.
- The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital that specializes in the treatment of Tuberculosis, HIV testing and counselling

and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation.

- The subject property is zoned "Agricultural" subject to conditions stated on Page 21 of the Final Scoping Report attached in this application as Annexure J.
- In terms of the City of Johannesburg GIS layers the site is affected by Channelled Valley Bottom Wetlands, the Jukskei River and its tributaries, 1:100 year floodlines and Critical Biodiversity Areas. This has been confirmed in the application.
- The major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 1 (CBA1), and some lesser portions being classified as Critical Biodiversity Area 2 (CBA 2).
- The site is within Wetland Management Zone 1 as identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection.
- It is reported that individuals and animals that died of anthrax and other contagious diseases were buried on site.
- Instead of the preferred Strategic Environmental Assessment, the Environmental Impact Assessment process has been initiated and this Department has commented on the Final Scoping Report on the 24th of April 2014 (attached as Annexure J: Final Scoping Report in the application). The comments are attached here as **Annexure A** for your ease of reference.

- Comments made by the Department include the following:
 - The Health Assessment and Risk study must be conducted and include the location of identified graves, causes of death and expert opinion on soil and/or groundwater contamination including buffer requirements.
 - The proposal to relocate Sizwe Hospital to Edenvale Hospital must be explored further. It must be confirmed whether there is a buffer required around the hospital for the current operations due to the nature of illnesses that are treated.
 - Other studies including the Fauna and Flora, Wetland Delineation and Geohydrological Assessment must be conducted and included in the Environmental Impact Report.

Studies included in the application are as follows:

- Annexure J: Environmental Impact Assessment Report
 - Annexure K: Final Report on Phase 1 Geotechnical Site Investigation
 - Annexure L: Bulk Civil Engineering Service Report
 - Annexure M: Bulk Electrical Statement
 - Annexure N: Traffic Impact Assessment
- The "Developmental Precincts" identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the open space must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways. The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City
 - The application has identified two strategies for stormwater management including attenuation of accumulated stormwater in the Jukskei River, and attenuation of stormwater before draining into Jukskei River. (Annexure L). While it is regarded as entirely premature to be discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are NOT supported by this Department and are **STRONGLY OPPOSED**. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the

site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer.

- It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environment, Infrastructure Services Department (see Annexure B for details).
- The application makes reference to the provision and upgrading of associated infrastructures such as sewage line, water supply, and electricity supply including substation, roads and cemeteries among others. These activities are likely to pose detrimental environmental impacts on the receiving environment; therefore, they need to be assessed thoroughly in the Environmental Impact Assessment Report.
- The Greater Linksfield Mixed Inclusionary Development has been divided into eight townships and this Department has received all eight separate Township Establishment applications (Sunningdale Extension 13 – 20) for comments.

Specific findings (Sunningdale Extension 14):

- The property encompasses four erven, where two erven (14.79ha) will be zoned "Special" (for dwelling houses block or blocks of flats (at a maximum density of 160u/Ha), residential buildings, institutional uses, educational uses, shops, offices, place of public worship, place of amusement, showrooms, motor related and commercial, public street, private open space including such supportive uses and two erven (2.50ha) will be zoned "Private Open Space" for cemeteries.
- This township occupies the western portion of the greater development and measures 17.29ha in extent.
- The Geotechnical survey classifies the site as zone 2 and 3. A summary of the Geotechnical zones has been given on the attached draft layout plan: SUNNING_17LayD2014.03.12.
- Erven 5 and 7 Sunningdale Extension 14, Private Open Space, consist of cemeteries that are likely to be covering bodies that died of contagious diseases.
- There is a servitude traversing the proposed development.
- Part of the site is affected by illegal dumping.

Signature

Date

Comments:

Having considered the above factors it is evident that the proposed development has detrimental impacts that will affect the receiving environment. The EIA process is underway. The outcome of the Specialist Studies, some of which have not yet been compiled and considered, may have spatial implications for the proposal. The Department objects to the application and is of the opinion that **this application must be pended until the EIA process is finalised.**

Other comments:

- In addition to conservation and protection of sensitive natural open space areas, provision will need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of this Department. No public open space contributions will be accepted in lieu of parkland.
- The Open Space Framework proposes that a standard of 2,4ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open

spaces such as protected areas, high sensitivity vegetation and ridges or wetlands and associated buffers.

- The outcomes of all the Specialist Studies proposed in the Final Scoping Report must be used to generate a composite sensitivity map that will inform the layout plan of the proposed township. Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment (not yet compiled and considered in the current layout) and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003).
- All services related specialist studies/reports must be included and evaluated in the EIA report. The EIA must also show all existing servitudes/services and proposed upgrades including servitudes and confirm whether all listed activities have been applied for.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.

Should you have any queries or require any further information, please do not hesitate to contact me.

Yours sincerely, **City of Joburg**
Infrastructure and Services Department
Impact Management And Compliance

Signature

Lebo Molefe

Acting Unit Head: Impact Management and Compliance Monitoring

Tel: 011 587 4205

Fax: 086 627 7516

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature

Date

21/07/2014

ANNEXURE A

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature

M. J. R.

Date

21/07/2014

ANNEXURE B

2019-2020
Annual Report
Annexure B
Financial Statements
Particulars
Amount in Lakhs



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Date: 25/04/2014

Lizelle Gregory
Bokamoso Landscape Architects and Environmental Consultants
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Marcelana
0161

Lizelleg@mweb.co.za

Dear Madam

SCOPING REPORT FOR THE PROPOSED MIXED USE DEVELOPMENT ON PORTIONS 87, 148, 149 AND THE REMAINDER OF PORTION 1 OF THE FARM RIETFontein 61-IR: GAUT: 002/13-14/E0153

The Draft and Final Scoping Reports dated December 2013 and February 2014 received from Bokamoso Landscape Architects and Environmental Consultants has reference.

Description of the project

The application is for the Environmental Authorisation from the Gauteng Department of Agriculture and Rural Development in accordance with NEMA EIA Regulations, 2010. The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures on Portions 87, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.

The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital and specializes in the treatment of Tuberculosis, HIV testing and counselling and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation. The subject property is zoned "Agricultural" subject to conditions stated on page 21 of the Scoping Report.

Guidelines, By-laws, Precinct Plans, Policies and Environmental Management Frameworks:

In terms of EIA Regulations, 2010, the proposed activity is listed in all three listing notices and requires Environmental Authorisation prior to the commencement. Fully fledged EIA is required for this kind of development.

The Sub Area 28 of the 2010-2011 Region E RSDF is a large, relatively underutilised Sub Area and is one of the last remaining open tracts in the City of Johannesburg. It is the location of critical public health institutions. It aims amongst other things to reinforce this area as an institutional node focusing on the medical field and to promote residential development, particularly low income residential development.

Although the RSDF promotes the development of this area, it also appeals for the protection of the sensitive environmental attributes such as the Jukskei River and its tributaries as well as the associated wetlands and floodlines.

Description of alternatives

The submitted Draft and Final Scoping Reports has identified adequate alternatives for executing the proposed activity. These include the No-Go, Land Use, Services, Locality and Layout alternatives. However, section 6 of the Scoping Report has prematurely ruled off some identified alternatives without assessing them i.e. section 6.2.2: Residential development.

Description and assessment of the identified environmental issues

The submitted report in Section 10 and the attached plan of study has identified and assessed a number of environmental issues including but not limited to biophysical and socio-economic impacts of the proposed development during construction and operational phases. The methodology for assessing the identified issues has been outlined in the report and is satisfactory.

Geology and Soils

The site is underlain by mafic and granitic rocks and it is not underlain by dolomitic bedrock. Stability investigation of the site is not necessary. The soils of the site pose geotechnical constraints that warrant precautionary foundation measures due to the following:

- Collapsible soil horizons in the residual granitic soil
- Perched water tables that may form on the bedrock and pedogenic horizon interface with the overlying soils with possible surface seepage zones on the lower slopes and next to the drainage channels
- Difficult excavation conditions due to shallow bedrock
- Higher runoff and surface ponding due to low infiltration

The detailed Geotechnical report will be compiled and submitted with comments from the Council of Geosciences as part of the EIR. The Geotechnical engineer will confirm the presence of hazardous waste covered under the ground, if any.

Hydrology

The proposed site is affected by both 1:50 and 1:100 year floodlines. The Jukskei River floodplain and its tributaries as well as valley bottom wetland systems flows or occur on the site. The channels of both the Jukskei River and its tributaries are significantly degraded due to increased stormwater runoff, historical agricultural activities, historical infrastructure development, and failed human interventions in controlling erosion. Significant engineering intervention is required to stabilise the banks.

Two small wetlands identified on site are said to be disturbed but they can be rehabilitated and kept as open spaces. Therefore, detailed wetland delineation, assessment and protection measures as well as stormwater management plan must be submitted with the EIR. This will help to alleviate possible adverse impacts on the integrity and sustainability of the wetlands.

Topography

The natural drainage system will have to transfer the arrival of additional stormwater faster. The change in development hydrology and stormwater attenuation is essential in order to offset the

potential unfavourable impacts of post development. The topographical characteristics have a negative effect on the development potential of the site. The stormwater management plan must take cognizance of the topography of the site.

Climate

Wet summer conditions may make construction and environmental rehabilitation very difficult whereas dry and windy conditions may exacerbate dust pollution. Climatic conditions need to be taken into consideration when scheduling construction works on site.

Fauna and Flora

The site is ecologically sensitive since it has the primary vegetation, rivers and wetland accommodating Red listed mammals, Red listed plants, Orange listed plants, invertebrates and birds. The proposed activity is likely to have adverse detrimental impacts on biodiversity and ecosystems on site and off site as well. Therefore, a detailed Fauna and Flora survey, including a specialist biodiversity studies, will be done and reports submitted as part of the EIR.

Heritage

Buildings and infrastructure representing all periods from 1890 to modern times forming part of the Hospital Complex occur on site. Three cemetery sites were identified and the possibility of more burial sites or graves is still to be investigated. The relocation of Sizwe Hospital is a concern. A full heritage report must be submitted as part of the EIR where the comments from SAHRA must be addressed.

Land pollution and Infectious Diseases

The site is general a vacant open space perceived to be contaminated due to the excessive dumping of rubbish and potential hazardous waste related to the cemeteries on site. The various graves are associated with the Sizwe Hospital established to treat infectious diseases. Those who died of these infections were buried on this site. It is reported that animals that died of anthrax were also buried on the site. It is crucial to conduct a detailed assessment of the site to establish the location of the graves and their treatment. There is also a need to conduct a detailed soil and water analysis to determine the presence of spore/ pathogens/ viruses and the threat/ risk to humans during construction and occupation. The outcomes of these studies must be included in the EIR.

Agricultural Potential

The agricultural potential of the site ranges from high to very low. The proposed development is likely to take away soils with high potential for agricultural productivity. In this regard the applicant may consider conducting a thorough agricultural potential of the land in order to incorporate agricultural activities into the proposal such that food security and food safety in the region can be attained at the same time.

Land use

Although the site is located in an area characterized as residential area with many complimentary business operations, it is mostly vacant and undeveloped with the exception of approximately 25ha occupied by the hospital complex, cemeteries and personnel accommodation. The proposed activity includes among others the residential, retail, offices, light industrial, educational, medical facilities, hotels and conference facilities. A needs assessment and economic impact assessment will be conducted and the report attached to the EIR.

Visual impact

The proposed activity is likely to have adverse visual impact since and therefore lead to the loss of "sense of place". A detailed visual impact assessment must be conducted and mitigation measures supplied during EIA. Architectural guidelines must be based on the mitigation measures. Cultural and historical features that contribute to the "sense of place" must be identified. Aesthetic areas must be identified. The reports must be attached to the EIR.

Noise impact

The development is likely to have adverse noise impact on the surrounding residents. Therefore, noise impact assessment must be conducted in order to come up with mitigation measures. The report and mitigation measures should be submitted with the EIR.

Light pollution

Street and security lighting may have negative impacts on the eyes of the oncoming traffic and residents if not properly installed. Mitigation measures must be investigated during EIA process and included in the EIR.

Air quality

Atmospheric pollution is likely to occur during construction phase, especially due dust and infectious diseases. Dust suppression techniques such as sprinkling the construction site regularly water and dust nets may mitigate the impacts to the ambient levels.

Demography

Population statistics are very crucial to ascertain the need and viability of a development of this magnitude. Motivations in this regard will be attached to the EIR.

Bulk services

Upgrades and new water and sewer infrastructure would be required to service the proposed development. The combination of Bruma outfall and the diversion of Illiondale pump station to the Modderfontein outfall will provide sufficient capacity. Where the pipelines cross water courses, appropriate licenses will be sought. Detailed assessment and recommendations for adequate services must be included in the EIA report.

Stormwater has a significant influence on site development methodology. A Stormwater Master Plan has been compiled. Detention facilities are proposed to be utilized during design storm occurrences in order to contribute to the ecological wellbeing of the riverine systems. All external stormwater pipes and channels must be indicated on the plans. Details of the properties that would be affected by the Stormwater Management Plan must be provided including the servitudes to be registered.

The existing underground and overhead bulk electricity network would supply the required electricity to this development. Johannesburg City Power has indicated that there should be enough capacity from the underground network even though there might be a need to supply from several 11kV circuits which are yet to be identified. The developer may be required to construct a switching station in line with Johannesburg City Power's specifications and standards. The position of the switching station is yet to be finalized. Details of the properties that would be affected by the proposed electricity upgrad must be provided including the servitudes to be registered.

The alternative energy sources such as gas, solar water heating and solar energy for streets and area lighting would be used in the proposed development. Gas will be supplied from the Egoli Gas High Pressure Pump Station at 5 Edward Avenue in Sandringham and its alignment will follow existing roads to the edge of the development site.

The waste management aspect is not clear in terms of who will remove what kind waste and dispose them off where and how? Therefore, a confirmation on who will handle domestic and industrial waste must be provided in the EIR. Details of relevant landfill sites where the waste will be disposed must be provided as well as the capacity confirmation.

Traffic

The proposed development is in close proximity to the airports, rail, bus rapid transit and freeways. Major roads around the site will be upgraded and other roads are proposed within the development. The site is accessible through the N3/Linksfild Road interchange and

N3/Modderfontein Road interchange. The entire transportation and traffic impact investigation must be included in the EIA report.

Public Participation Process

This process is very crucial in the EIA process. The public will be given another opportunity to raise their views about the proposed activity during EIA phase. The issues and comments raised will be included in the EIR.

Recommendations

This Department is of the opinion that, looking at the nature and magnitude of this activity and associated impacts on the surrounding ecological and socio-economic environment, the following issues must be addressed in the Environmental Impact Assessment Report:

- The identified alternatives must be assessed comparatively in order to come up with the best suitable alternatives (proposals) and mitigation measures that are project and site specific.
- Specialist studies to determine the locality, extent and proper management of the sensitive environmental features as per the discussion above must be conducted as stipulated in the Draft and Final Scoping Reports' Section 10 and accompanying Plan of Study (Annexure D). These are necessary in order to minimize adverse impacts on the environment and to ensure that the natural environment is adequately streamlined into the proposed development and the benefits thereof are fully realized.
- Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003).
- The Draft and Final Scoping Reports on page 2 indicated the possibility of the occurrence of graves on site where people and/or animals that died from infectious diseases were buried. A detailed investigation into this (health assessment and risk study) must be conducted by a suitably qualified specialist. The Department of Health (at all spheres of government including the medical institutions in the surrounding area), and Johannesburg City Parks must be given an opportunity to comment on this report prior to the submission of the EIA report.
- In the process of engaging the Department of Health and the medical facilities in the area, there are crucial issues that must be addressed. Those issues include the type of treatment offered, risks, buffers required, and the relocation of Sizwe Hospital among others.
- The Health Assessment and Risk study must include but not only limited to the location of grave, number of graves, list of causes of death, indication on whether humans or animals are buried in such grave, compatible land uses, expert opinion on soil and/or ground water contamination including buffer requirements. The results of the study must be reviewed independently.
- Upon completion of the studies, a composite sensitivity map overlaid with the proposed development land uses must also be submitted with the EIA report. The map must be legible.
- All the issues raised by the interested and/or affected parties must be considered and addressed, including the issue of the alternative that was proposed a number of years back for the property to be used for a 'medical park.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.
- The layout plan must further avoid the roads that cross the sensitive areas.
- All services reports must be included and evaluated in the EIA report.

Should you have any queries or require any further information, please do not hesitate to contact the Department.

Kind regards,



Linda Kuhn

Acting Unith Head: Impact Management and Compliance Monitoring

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Fax: 086 627 7516

CC: Simon Mafu

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INTERNAL MEMO

TO : Mr T Tshimange

CC : Mr L Nevuthalu

FROM : Jane Eagle

YOUR REF : PROPOSED SUNNINGDALE EXT 18

DATE : 25 June 2014

Reference is made to the application for the establishment of a township – proposed Sunningdale Ext 18 on a part of Rem of Portion 1, Ptn 137, Ptn 138 and Ptn 149 Rietfontein 61 IR. It is further understood that this is but one of a number of townships making up what is referred to by the applicant as the Linksfield Mixed Use Inclusionary Development comprising 8 proposed townships, proposed Extensions 13 to 20, on amongst others, Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR, measuring approximately 271,57 ha. The proposed actual development area measures approximately 194,99 ha in extent. The property is zoned "Agricultural" subject to conditions.

General:

In regard to the proposed township application, there are a number of procedural aspects which are of concern and need to be addressed.

Firstly, for a site of such environmental sensitivity, it is unacceptable and premature for the township establishment process to be so far advanced and comments sought prior to the completion of critical environmental studies as part of an Environmental Impact Assessment. In the absence of certain essential specialist environmental studies, any comments from an environmental perspective can only be limited and based on general site attributes. This is contrary to the spirit of NEMA which holds all decision making authorities and regulators accountable to consideration of NEMA principles in their decision making processes. It is regarded as entirely premature to be requested to provide comments on the town planning application when certain critical environmental specialist studies have not been completed.

In our view the application remains incomplete without the availability of the specialist studies, and cannot be properly assessed from an environmental perspective.

Secondly, it is questionable why the development is being considered as a number of discrete townships, rather than on a holistic basis for an integrated development. The environmental sensitivities and importance of the overall site comprising all proposed townships, as highlighted below, underscore the need for any development proposals to be considered in an integral manner, taking cognizance of the total site proposed for development, and of the development framework for the larger site as a whole. The correct process for consideration of a site of this sensitivity and extent would be a Strategic Environmental Assessment. This should ideally precede any environmental authorization issues.

Biodiversity

Notwithstanding, it should be noted that the major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 1 (CBA1), and some lesser portions being classified as Critical Biodiversity Area 2 (CBA 2).

The applicant's own specialist report confirms the environmental importance and sensitivities of the site.

The layout for the wider site appears to completely disregard these sensitivities or biodiversity aspects in favour of development, with a minimum buffer proposed on a very constrained riparian zone. In the absence of the detailed fauna and flora studies to inform otherwise, important biodiversity sites, in particular those classified as CBAs, should be excluded from the development areas and conserved as environmentally sensitive areas.

Further, the "Developmental Precincts" identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the open space must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways. The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City. The proposed layout also appears to assume the standard wetland or riparian zone buffers of 30 m. In the absence of detailed fauna and flora studies, it is not possible to determine the final width of the buffers, which may require to be increased on the basis of biodiversity issues. Critical drainage pressures in the sub region may also warrant the imposition of increased riparian buffers for hydrological protection.

Glaringly absent in the motivation memorandum is any acknowledgement of how the proposal in any way serves the needs of the environment or sustainability and biodiversity protection, or the planning objectives of Sub Area 28, in particular the recommended interventions "To Protect the quality and integrity of the environment". While the report has acknowledged this objective, there is nothing in the proposed layout and overall development approach to suggest that anything more than lip service has been paid to this aspiration. It is in fact disingenuous for the report to cite a principle such as "Emphasis will be placed on quality public space, pedestrian environment, public parks and protection of biodiversity areas when in fact the proposed layout implies the large scale loss of areas designated as Critical Biodiversity Areas.

Biodiversity conservation aspects and ecological linkages are barely acknowledged in the proposed development approach and layout which fails to address a number of findings from the applicant's own specialist findings for the scoping phase, as well as various COJ policies and approved planning tools such as the COJ Wetland Protection and Management Plan, which highlight Modderfontein as having one of the most important wetland systems from a biodiversity perspective. The site now under consideration is a critical link area between open space areas and refuges on Huddle Park, and the greater Modderfontein area. The preliminary assessment undertaken by Bokamoso Landscape Architects and Environmental Consultants underscores the conservation importance of this site, identified a number of environmental sensitivities and conservation features identified as "Irreplaceable" in terms of the Gauteng C Plan, including:

- Habitat for Red listed mammals
- Habitat for Red listed plants
- Orange listed plant habitat
- PPrimary vegetation
- Rivers and wetland
- Invertebrates, and
- Bird Life.

The report further highlights the likely impacts as inter alia

- Loss of sensitive grassland areas
- Possible red data flora and fauna species,
- Sensitive vegetation
- Loss of habitat
- Loss of movement corridor and lack of open space links.

The proposed layout does not appear to have made any attempt to deal with these issues, merely providing for a narrow riparian corridor, most of which is proposed as recreational parks for residents of the proposed development.

The proposed amended layout both appear to overlook these important conservation areas and make provision only for the protection of a narrowly defined, minimum wetland and riparian zone through the development.

Wetland protection and management

Both the original layout and the proposed amended layout do identify wetland areas associated with the watercourses that traverse the site. While the extent of wetlands does not necessarily preclude development on the entire site, the development would have to comply with the provisions of the approved COJ Catchment Management Policy be adhered to i.e. That the riparian zone/wetland and associated buffer zone of 30 metres from the outer edge of the wetland temporary zone be designated as sensitive and no development be permitted within such wetland and buffer zone or within the 1:100 year floodline, whichever is the greatest. In addition, the hydrological linkages and dependencies also need to be properly understood and protected within any development of the site. Given that the valley bottom wetland forms part of a continuous open space system it is required that this area be designated as sensitive and conserved in a manner which protects its ecological functions. As indicated, it is possible that increased buffers may be warranted for the site due to biodiversity, habitat and hydrological imperatives.

Even the applicant's own geotechnical report confirms the expected geotechnical constraints for the sites as being:

- Collapsible soil
- Seasonal shallow groundwater, perched groundwater and surface seepage near the floodplain,
- Moderate erodability of surficial soils and
- localised difficulty of excavation to 1.5 m depth

Further, the site is within Wetland Management Zone 1 as identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection. In terms of key management concerns for Wetland Management Zone 1, management of sediments and water quality are both identified as key, while pre-emptive engineering is advocated whereby sufficient space is maintained for the systems to adjust with little active intervention to the changes in hydrology or that active engineering is applied so as to ensure that wetland management objectives are met.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Storm Water Management

In regard to the two options proposed for the management of stormwater and drainage associated with the proposed development, while it is regarded as entirely premature to be

discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are NOT supported by this unit and are STRONGLY OPPOSED. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer, and the following conditions would apply:

A storm water management plan will need to be submitted for the approval by both the Johannesburg Roads Agency and Environmental Management prior to the approval of the final Site Development Plan, and will be required to implement a storm water management scheme to meet the following criteria/standards:

- Peak discharge - no increase in discharge for any event of any duration up to the 25 year RI event
- Volume of runoff - no increase up to the annual 10 year rainfall
- Runoff frequency - no surface runoff for the 1 yr RI event of any duration
- Water Quality - no deterioration

Space allocation for storm water management must be indicated on the site development plan, outside of the wetland and wetland buffer areas or any environmentally sensitive areas. NO in-stream attenuation measures will be considered acceptable.

The storm water management plan should in any event minimize the generation of surface runoff and storm water through adopting the principles of Water Sensitive Urban Design (WSUDS) and Sustainable Urban Drainage Systems (SUDS) which provide various options such as bio-retention ponds, enhanced swales and grass lined channels, stone filled infiltration ditches, permeable paving etc. in order to minimize surface runoff and to maintain water quality.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Open Space Provision

In addition to conservation and protection of sensitive natural open space areas, provision would need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of the Environmental Management Department of COJ. No public open space contributions will be accepted in lieu of parkland

The Open Space Framework proposes that a standard of 2,4 ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open spaces such as protected areas high sensitivity vegetation and ridges or wetlands and associated buffers.

Land Use / Zonings

As stated above, it is considered entirely premature to be considering the town planning application prior to the availability of final detailed specialist environmental studies. Notwithstanding, should the principle of development of parts of the site be approved, consideration should be given to the recommendations of the draft Bio Regional Plan for Johannesburg and to the COJ Open Space Framework in regard to those land uses which are

appropriate to areas immediately adjacent to important biodiversity areas or sensitive environmental sites. This should be taken into account in terms of land use, detailed layouts, densities and typologies.

Layout

It is our view that consideration of the township should not be proceeded with until all the necessary detailed environmental specialist studies are available and a sound Strategic Environmental Assessment approach has been followed to inform any development approach for such an environmentally sensitive site which should inform the basic principles of any development approach and ensure that the interests of environmental sustainability and biodiversity protection have been adequately addressed and considered. It is our considered opinion that the current approach of fragmented township applications does not meet the requirements for holistic and sustainable development approach to such a precious site within the City and that the township applications are premature.

In light of the above, this division cannot support the proposed township or associated layout until the concerns and environmental issues highlighted above have been resolved.

Should you require further clarity on any of the above issues, please do not hesitate to contact me.

Regards

Jane Eagle
Assistant Director: Open Space Planning
Environmental Management

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UNIT : IMPACT MANAGEMENT AND COMPLIANCE MONITORING

INTERNAL MEMO

TO : Ben Pretorius

FROM : Tshilidzi Tshimange

YOUR REF : 08-14205

DATE : 21 July 2014

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature

Date

[Handwritten signature]
21/07/2014

APPLICATION: TOWNSHIP ESTABLISHMENT

PROPERTY DESCRIPTION: SUNNINGDALE EXTENSION 13

The application is for the establishment of a mixed use development on a part of Re Portion 1, Portion 137, Portion 138 and Portion 149 Rietfontein 61-IR.

We have examined this application in terms of the following environmental criteria:

- Location;
- Surrounding land uses;
- Proximity to conservation areas and areas of ecological importance;
- Alignment to environmental standards, legislation and policies including:-
 - National Environment Management Act (Act 107 of 1998) as amended (NEMA) and Environmental Impact Assessment Regulations, 2010
 - City of Johannesburg Catchment Management Policy, 2008
 - Johannesburg Metropolitan Open Space Systems, 2008
- City of Johannesburg GIS layers including Wetland Audits, Streams and Rivers, 1:100 year floodlines, and Biodiversity Sector Plan; and
- The reviewed Final Scoping Report (also included in the application).

General findings (Sunningdale Extensions 13 – 20 / Linksfield Mixed Use Inclusionary Development):

- The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures among others on Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.
- The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital that specializes in the treatment of Tuberculosis, HIV testing and counselling

and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation.

- The subject property is zoned "Agricultural" subject to conditions stated on Page 21 of the Final Scoping Report attached in this application as Annexure J.
- In terms of the City of Johannesburg GIS layers the site is affected by Channelled Valley Bottom Wetlands, the Jukskei River and its tributaries, 1:100 year floodlines and Critical Biodiversity Areas. This has been confirmed in the application.
- The major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 1 (CBA1), and some lesser portions being classified as Critical Biodiversity Area 2 (CBA 2).
- The site is within Wetland Management Zone 1 as identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection.
- It is reported that individuals and animals that died of anthrax and other contagious diseases are buried on site.
- Instead of the preferred Strategic Environmental Assessment, the Environmental Impact Assessment process has been initiated and this Department has commented on the Final Scoping Report on the 24th of April 2014 (attached as Annexure J: Final Scoping Report in the application). The Department's comments are attached here as **Annexure A** for your ease of reference. Comments made by the Department include the following:

- The Health Assessment and Risk Study must be conducted. It must include the location of identified graves, causes of death and expert opinion on soil and/or groundwater contamination including buffer requirements.
- The proposal to relocate Sizwe Hospital to Edenvale Hospital must be explored further. It must be confirmed whether there is a buffer required around the hospital for the current operations due to the nature of illnesses that are treated.
- Other studies including the Fauna and Flora, Wetland Delineation and Geo-hydrological Assessment must be conducted and included in the Environmental Impact Report.

Studies included in the application are as follows:

- Annexure K: Final Report on Phase 1 Geotechnical Site Investigation;
- Annexure L: Bulk Civil Engineering Service Report;
- Annexure M: Bulk Electrical Statement; and
- Annexure N: Traffic Impact Assessment.

- The 'Developmental Precincts' identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the open space must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways. The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City.
- The application has identified two strategies for stormwater management including attenuation of accumulated stormwater in the Jukskei River, and attenuation of stormwater before draining into Jukskei River (Annexure L). While it is regarded as entirely premature to be discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are NOT supported by this Department and are **STRONGLY OPPOSED**. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer.

Signature: _____ Date: 2014

- It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environment, Infrastructure Services Department (see Annexure B for details).
- The application makes reference to the provision and upgrading of associated infrastructures such as sewage line, water supply, and electricity supply including a substation and roads among others. These activities are likely to pose detrimental environmental impacts on the receiving environment; therefore, they need to be assessed thoroughly in the Environmental Impact Assessment Report.
- The Greater Linksfield Mixed Inclusionary Development has been divided into eight townships and this Department has received all eight separate Township Establishment applications (Sunningdale Extension 13 – 20) for comments.

Specific findings (Sunningdale Extension 13):

- Sunningdale Extension 13 is proposed to have a 40m wide public street running from north to south of the site linking Sunningdale Extension 13, 14, 16, 17, 18 and 19, a "Private Open Space" erf (park measuring 0.32 ha) and a "municipal" erf for a substation measuring 1.09 ha.
- In terms of the map the 40m wide street is proposed to cross of the Jukskei River and its tributary as well as the associated wetland and 1:100 year floodline twice. This is not in line with the City of Johannesburg Catchment Management Policy and Section 28 of NEMA.
- This township occupies the part of the northern portion of the greater development and measures 12.35 in extent (including the streets).
- The proposed layout plan (Annexure O and Annexure P) indicates that the 30m buffer required in terms of the City of Johannesburg Catchment Management Policy has been calculated from the wetland layer instead of the 1:100 year floodline as is the greater of the two. The proposed layout also appears to assume the standard wetland or riparian zone buffers of 30m. In the absence of detailed fauna and flora studies, it is not possible to determine the final width of the buffers, which may require to be increased on the basis of biodiversity issues. Critical drainage pressures in the sub region may also warrant the imposition of increased riparian buffers for hydrological protection.
- The substation erf is likely to be affected by the 30m buffer from the delineated wetland or 1:100 year floodline, whichever is greater.
- The township is affected by 'rocky' areas. The Fauna and Flora study to be done as part of the EIA Study must indicate what 'rocky' means with respect to environmental sensitivities. The Bulk Civil Engineering Services Report or relevant study must indicate whether blasting will be required and impact must be addressed in the EIA.
- Erf 37 is zoned Private Open Space and will be used as a park.
- The Geotechnical survey classifies the site as zone 1, 2 and 3. A summary of the Geotechnical zones has been given on the attached draft layout plan: SUNNING_13LayD2014.03.07.

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Comments:

Signature _____

Date _____

21/07/2014

Other comments:

- Since the proposed layout plan indicates that the 30m buffer has been calculated from the wetland delineation layer instead of the 1:100 year floodline or whichever is the greater of the two, there is a great need to recalculate the 30m buffer in line with the Catchment Management Policy of the City of Johannesburg. In terms of City of Johannesburg Catchment Management Policy no development activity will be supported within the 30m buffer of the delineated wetland and certified 1:100 year floodline, whichever is the greatest.

- All the areas within the 30m buffer of the delineated wetland and certified 1:100 year floodline, whichever is the greatest must be zoned Public Open Space. The purpose of these areas must be conservation and not recreational. The areas are also linked to a wider open space system which is zoned public open space to the north and south of the property. Current and future climate change considerations require that open spaces be provided to serve for uses including biodiversity and flood protection.
- All proposed infrastructure must be designed to be resilient to climate change considerations. This includes the design of bridges to facilitate water flow and the relocation of sewers pipes, where upgrades to larger pipes are proposed, outside the 1:100 year floodline and delineated wetland.
- In addition to conservation and protection of sensitive natural open space areas, provision would need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of this Department. No public open space contributions will be accepted in lieu of parkland.
- The Open Space Framework proposes that a standard of 2,4 ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open spaces such as protected areas, high sensitivity vegetation and ridges or wetlands and associated buffers.
- The outcomes of all the Specialist Studies proposed in the Final Scoping Report must be used to generate a composite sensitivity map that will inform the layout plan of the proposed township. Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment (not yet compiled and considered in the current layout) and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003).
- All services related specialist studies/reports must be included and evaluated in the EIA report. The EIA must also show all existing servitudes/services and proposed upgrades including servitudes and confirm whether all listed activities have been applied for.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.

Having considered the above factors it is evident that the proposed development has detrimental impacts that will affect the receiving environment. The EIA process is underway. The outcome of the Specialist Studies (some of which have not yet been compiled and considered, may have spatial implications for the proposal. The Department objects to the application and is of the opinion that **this application must be pended until the EIA process is finalised.**

Should you have any queries or require any further information, please do not hesitate to contact me.

Yours sincerely,

City Of Joburg
 Environment Infrastructure and Services Department
 Impact Management And Compliance
 Signature Lebo Molefe
 Date 21/07/2014

Lebo Molefe

Acting Unit Head Impact Management and Compliance Monitoring

Tel: 011 587 4205

Fax: 086 627 7516

ANNEXURE A

City Of Joburg
Environment Infrastructure and Services Department
Impact Management And Compliance

Signature Mokete
Date 21/07/2014

10/1/2014 10:00:00
10/1/2014 10:00:00

ANNEXURE B

Annexure B.2.1.1
The following table provides a summary of the data collected for the purpose of the study. The data was collected from the following sources:

Source	Year	Sample Size	Response Rate
Source 1	2010	100	85%
Source 2	2011	120	90%
Source 3	2012	150	88%



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Our Ref: TT/EIM/14/02/2014
Contact: Tshilidzi Tshimange
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Tel: 011 587 4236
Fax: 086 627 7516
Date: 25/04/2014

Lizelle Gregory
Bokamoso Landscape Architects and Environmental Consultants
P.O.Box 11375
Maroelana
0161

Lizelleg@mweb.co.za

Dear Madam

SCOPING REPORT FOR THE PROPOSED MIXED USE DEVELOPMENT ON PORTIONS 87, 148, 149 AND THE REMAINDER OF PORTION 1 OF THE FARM RIETFontein 61-IR: GAUT: 002/13-14/E0153

The Draft and Final Scoping Reports dated December 2013 and February 2014 received from Bokamoso Landscape Architects and Environmental Consultants has reference.

Description of the project

The application is for the Environmental Authorisation from the Gauteng Department of Agriculture and Rural Development in accordance with NEMA EIA Regulations, 2010. The Gauteng Department of Human Settlement in collaboration with the private sector partners wish to develop a mixed use township encompassing educational, commercial, show rooms, business, retail, shops, places of amusement, restaurants, hotel, offices, residential uses and associated infrastructures on Portions 87, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR measuring approximately 271.57ha. However, the actual development area measures approximately 194.99ha in extent.

The site is mostly vacant and undeveloped, with the exception of the 15ha occupied by the Sizwe Hospital and specializes in the treatment of Tuberculosis, HIV testing and counselling and tropical diseases. The other 10ha of the site is used as cemeteries and the further 3ha is covered by personnel accommodation. The subject property is zoned "Agricultural" subject to conditions stated on page 21 of the Scoping Report.

Guidelines, By-laws, Precinct Plans, Policies and Environmental Management Frameworks:

In terms of EIA Regulations, 2010, the proposed activity is listed in all three listing notices and requires Environmental Authorisation prior to the commencement. Fully fledged EIA is required for this kind of development.

The Sub Area 28 of the 2010-2011 Region E RSDF is a large, relatively underutilised Sub Area and is one of the last remaining open tracts in the City of Johannesburg. It is the location of critical public health institutions. It aims amongst other things to reinforce this area as an institutional node focusing on the medical field and to promote residential development, particularly low income residential development.

Although the RSDF promotes the development of this area, it also appeals for the protection of the sensitive environmental attributes such as the Jukskei River and its tributaries as well as the associated wetlands and floodlines.

Description of alternatives

The submitted Draft and Final Scoping Reports has identified adequate alternatives for executing the proposed activity. These include the No-Go, Land Use, Services, Locality and Layout alternatives. However, section 6 of the Scoping Report has prematurely ruled off some identified alternatives without assessing them i.e. section 6.2.2: Residential development.

Description and assessment of the identified environmental issues

The submitted report in Section 10 and the attached plan of study has identified and assessed a number of environmental issues including but not limited to biophysical and socio-economic impacts of the proposed development during construction and operational phases. The methodology for assessing the identified issues has been outlined in the report and is satisfactory.

Geology and Soils

The site is underlain by mafic and granitic rocks and it is not underlain by dolomitic bedrock. Stability investigation of the site is not necessary. The soils of the site pose geotechnical constraints that warrant precautionary foundation measures due to the following:

- Collapsible soil horizons in the residual granitic soil
- Perched water tables that may form on the bedrock and pedogenic horizon interface with the overlying soils with possible surface seepage zones on the lower slopes and next to the drainage channels
- Difficult excavation conditions due to shallow bedrock
- Higher runoff and surface ponding due to low infiltration

The detailed Geotechnical report will be compiled and submitted with comments from the Council of Geosciences as part of the EIR. The Geotechnical engineer will confirm the presence of hazardous waste covered under the ground, if any.

Hydrology

The proposed site is affected by both 1:50 and 1:100 year floodlines. The Jukskei River floodplain and its tributaries as well as valley bottom wetland systems flows or occur on the site. The channels of both the Jukskei River and its tributaries are significantly degraded due to increased stormwater runoff, historical agricultural activities, historical infrastructure development, and failed human interventions in controlling erosion. Significant engineering intervention is required to stabilise the banks.

Two small wetlands identified on site are said to be disturbed but they can be rehabilitated and kept as open spaces. Therefore, detailed wetland delineation, assessment and protection measures as well as stormwater management plan must be submitted with the EIR. This will help to alleviate possible adverse impacts on the integrity and sustainability of the wetlands.

Topography

The natural drainage system will have to transfer the arrival of additional stormwater faster. The change in development hydrology and stormwater attenuation is essential in order to offset the

potential unfavourable impacts of post development. The topographical characteristics have a negative effect on the development potential of the site. The stormwater management plan must take cognizance of the topography of the site.

Climate

Wet summer conditions may make construction and environmental rehabilitation very difficult whereas dry and windy conditions may exacerbate dust pollution. Climatic conditions need to be taken into consideration when scheduling construction works on site.

Fauna and Flora

The site is ecologically sensitive since it has the primary vegetation, rivers and wetland accommodating Red listed mammals, Red listed plants, Orange listed plants, invertebrates and birds. The proposed activity is likely to have adverse detrimental impacts on biodiversity and ecosystems on site and off site as well. Therefore, a detailed Fauna and Flora survey, including a specialist biodiversity studies, will be done and reports submitted as part of the EIR.

Heritage

Buildings and infrastructure representing all periods from 1890 to modern times forming part of the Hospital Complex occur on site. Three cemetery sites were identified and the possibility of more burial sites or graves is still to be investigated. The relocation of Sizwe Hospital is a concern. A full heritage report must be submitted as part of the EIR where the comments from SAHRA must be addressed.

Land pollution and Infectious Diseases

The site is general a vacant open space perceived to be contaminated due to the excessive dumping of rubbish and potential hazardous waste related to the cemeteries on site. The various graves are associated with the Sizwe Hospital established to treat infectious diseases. Those who died of these infections were buried on this site. It is reported that animals that died of anthrax were also buried on the site. It is crucial to conduct a detailed assessment of the site to establish the location of the graves and their treatment. There is also a need to conduct a detailed soil and water analysis to determine the presence of spore/ pathogens/ viruses and the threat/ risk to humans during construction and occupation. The outcomes of these studies must be included in the EIR.

Agricultural Potential

The agricultural potential of the site ranges from high to very low. The proposed development is likely to take away soils with high potential for agricultural productivity. In this regard the applicant may consider conducting a thorough agricultural potential of the land in order to incorporate agricultural activities into the proposal such that food security and food safety in the region can be attained at the same time.

Land use

Although the site is located in an area characterized as residential area with many complimentary business operations, it is mostly vacant and undeveloped with the exception of approximately 25ha occupied by the hospital complex, cemeteries and personnel accommodation. The proposed activity includes among others the residential, retail, offices, light industrial, educational, medical facilities, hotels and conference facilities. A needs assessment and economic impact assessment will be conducted and the report attached to the EIR.

Visual Impact

The proposed activity is likely to have adverse visual impact since and therefore lead to the loss of "sense of place". A detailed visual impact assessment must be conducted and mitigation measures supplied during EIA. Architectural guidelines must be based on the mitigation measures. Cultural and historical features that contribute to the "sense of place" must be identified. Aesthetic areas must be identified. The reports must be attached to the EIR.

Noise Impact

The development is likely to have adverse noise impact on the surrounding residents. Therefore, noise impact assessment must be conducted in order to come up with mitigation measures. The report and mitigation measures should be submitted with the EIR.

Light pollution

Street and security lighting may have negative impacts on the eyes of the oncoming traffic and residents if not properly installed. Mitigation measures must be investigated during EIA process and included in the EIR.

Air quality

Atmospheric pollution is likely to occur during construction phase, especially due dust and infectious diseases. Dust suppression techniques such as sprinkling the construction site regularly water and dust nets may mitigate the impacts to the ambient levels.

Demography

Population statistics are very crucial to ascertain the need and viability of a development of this magnitude. Motivations in this regard will be attached to the EIR.

Bulk services

Upgrades and new water and sewer infrastructure would be required to service the proposed development. The combination of Bruma outfall and the diversion of Iliondale pump station to the Modderfontein outfall will provide sufficient capacity. Where the pipelines cross water courses, appropriate licenses will be sought. Detailed assessment and recommendations for adequate services must be included in the EIA report.

Stormwater has a significant influence on site development methodology. A Stormwater Master Plan has been compiled. Detention facilities are proposed to be utilized during design storm occurrences in order to contribute to the ecological wellbeing of the riverine systems. All external stormwater pipes and channels must be indicated on the plans. Details of the properties that would be affected by the Stormwater Management Plan must be provided including the servitudes to be registered.

The existing underground and overhead bulk electricity network would supply the required electricity to this development. Johannesburg City Power has indicated that there should be enough capacity from the underground network even though there might be a need to supply from several 11kV circuits which are yet to be identified. The developer may be required to construct a switching station in line with Johannesburg City Power's specifications and standards. The position of the switching station is yet to be finalized. Details of the properties that would be affected by the proposed electricity upgrad must be provided including the servitudes to be registered.

The alternative energy sources such as gas, solar water heating and solar energy for streets and area lighting would be used in the proposed development. Gas will be supplied from the Egoli Gas High Pressure Pump Station at 5 Edward Avenue in Sandringham and its alignment will follow existing roads to the edge of the development site.

The waste management aspect is not clear in terms of who will remove what kind waste and dispose them off where and how? Therefore, a confirmation on who will handle domestic and industrial waste must be provided in the EIR. Details of relevant landfill sites where the waste will be disposed must be provided as well as the capacity confirmation.

Traffic

The proposed development is in close proximity to the airports, rail, bus rapid transit and freeways. Major roads around the site will be upgraded and other roads are proposed within the development. The site is accessible through the N3/Linksfield Road interchange and

N3/Modderfontein Road interchange. The entire transportation and traffic impact investigation must be included in the EIA report.

Public Participation Process

This process is very crucial in the EIA process. The public will be given another opportunity to raise their views about the proposed activity during EIA phase. The issues and comments raised will be included in the EIR.

Recommendations

This Department is of the opinion that, looking at the nature and magnitude of this activity and associated impacts on the surrounding ecological and socio-economic environment, the following issues must be addressed in the Environmental Impact Assessment Report:

- The identified alternatives must be assessed comparatively in order to come up with the best suitable alternatives (proposals) and mitigation measures that are project and site specific.
- Specialist studies to determine the locality, extent and proper management of the sensitive environmental features as per the discussion above must be conducted as stipulated in the Draft and Final Scoping Reports' Section 10 and accompanying Plan of Study (Annexure D). These are necessary in order to minimize adverse impacts on the environment and to ensure that the natural environment is adequately streamlined into the proposed development and the benefits thereof are fully realized.
- Specialist studies, not only limited to Wetland Delineation, Fauna and Flora Assessment and Geo-hydrological Assessment must be conducted by suitably qualified specialist as per South African Council for Natural Scientific Professions Act of 2003, (Act 27 of 2003).
- The Draft and Final Scoping Reports on page 2 indicated the possibility of the occurrence of graves on site where people and/or animals that died from infectious diseases were buried. A detailed investigation into this (health assessment and risk study) must be conducted by a suitably qualified specialist. The Department of Health (at all spheres of government including the medical institutions in the surrounding area), and Johannesburg City Parks must be given an opportunity to comment on this report prior to the submission of the EIA report.
- In the process of engaging the Department of Health and the medical facilities in the area, there are crucial issues that must be addressed. Those issues include the type of treatment offered, risks, buffers required, and the relocation of Sizwe Hospital among others.
- The Health Assessment and Risk study must include but not only limited to the location of grave, number of graves, list of causes of death, indication on whether humans or animals are buried in such grave, compatible land uses, expert opinion on soil and/or ground water contamination including buffer requirements. The results of the study must be reviewed independently.
- Upon completion of the studies, a composite sensitivity map overlaid with the proposed development land uses must also be submitted with the EIA report. The map must be legible.
- All the issues raised by the interested and/or affected parties must be considered and addressed, including the issue of the alternative that was proposed a number of years back for the property to be used for a 'medical park.
- The development layout plan must incorporate the principles of the Complete Streets. This includes the provision of non-motorised routes, pedestrian walkways and public transport.
- The layout plan must further avoid the roads that cross the sensitive areas.
- All services reports must be included and evaluated in the EIA report.

Should you have any queries or require any further information, please do not hesitate to contact the Department.

Kind regards.



Linda Kuhn

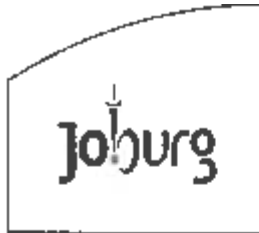
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CC: Simon Mafu

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INTERNAL MEMO

TO : Mr T Tshimange

CC : Mr L Nevuthalu

FROM : Jane Eagle

YOUR REF : PROPOSED SUNNINGDALE EXT 18

DATE : 25 June 2014

Reference is made to the application for the establishment of a township – proposed Sunningdale Ext 18 on a part of Rem of Portion 1, Ptn 137, Ptn 138 and Ptn 149 Rietfontein 61 IR. It is further understood that this is but one of a number of townships making up what is referred to by the applicant as the Linksfield Mixed Use Inclusionary Development comprising 8 proposed townships, proposed Extensions 13 to 20, on amongst others, Portions 87, 137, 138, 148, 149 and the Remainder of Portion 1 of the Farm Rietfontein 61-IR, measuring approximately 271,57 ha. The proposed actual development area measures approximately 194,99 ha in extent. The property is zoned "Agricultural" subject to conditions.

General:

In regard to the proposed township application, there are a number of procedural aspects which are of concern and need to be addressed.

Firstly, for a site of such environmental sensitivity, it is unacceptable and premature for the township establishment process to be so far advanced and comments sought prior to the completion of critical environmental studies as part of an Environmental Impact Assessment. In the absence of certain essential specialist environmental studies, any comments from an environmental perspective can only be limited and based on general site attributes. This is contrary to the spirit of NEMA which holds all decision making authorities and regulators accountable to consideration of NEMA principles in their decision making processes. It is regarded as entirely premature to be requested to provide comments on the town planning application when certain critical environmental specialist studies have not been completed.

In our view the application remains incomplete without the availability of the specialist studies, and cannot be properly assessed from an environmental perspective.

Secondly, it is questionable why the development is being considered as a number of discrete townships, rather than on a holistic basis for an integrated development. The environmental sensitivities and importance of the overall site comprising all proposed townships, as highlighted below, underscore the need for any development proposals to be considered in an integral manner, taking cognizance of the total site proposed for development, and of the development framework for the larger site as a whole. The correct process for consideration of a site of this sensitivity and extent would be a Strategic Environmental Assessment. This should ideally precede any environmental authorization issues.

Biodiversity

Notwithstanding, it should be noted that the major portion of the site as a whole (for the larger proposed development), is classified as an important biodiversity site in terms of the biodiversity data layer for Johannesburg, with approximately 80 percent of the site being designated as a Critical Biodiversity Area 1 (CBA1), and some lesser portions being classified as Critical Biodiversity Area 2 (CBA 2).

The applicant's own specialist report confirms the environmental importance and sensitivities of the site.

The layout for the wider site appears to completely disregard these sensitivities or biodiversity aspects in favour of development, with a minimum buffer proposed on a very constrained riparian zone. In the absence of the detailed fauna and flora studies to inform otherwise, important biodiversity sites, in particular those classified as CBAs, should be excluded from the development areas and conserved as environmentally sensitive areas.

Further, the 'Developmental Precincts' identified in the supporting memorandum (Sect 7.4) characterize the Green Space and natural landscape as primarily to be used for recreational purposes. Nowhere does the layout or precinct design appear to acknowledge the critical role the open space must continue to play in terms of facilitating the migration of species, or the critical need for continuity and connectivity of ecological linkages including passive pathways. The report further proposes the zoning of a most important open space riparian zone and ecological link as being Private Open Space, which is not acceptable for a primary tributary of this nature within the City. The proposed layout also appears to assume the standard wetland or riparian zone buffers of 30 m. In the absence of detailed fauna and flora studies, it is not possible to determine the final width of the buffers, which may require to be increased on the basis of biodiversity issues. Critical drainage pressures in the sub region may also warrant the imposition of increased riparian buffers for hydrological protection.

Glaringly absent in the motivation memorandum is any acknowledgement of how the proposal in any way serves the needs of the environment or sustainability and biodiversity protection, or the planning objectives of Sub Area 28, in particular the recommended Interventions "To Protect the quality and integrity of the environment". While the report has acknowledged this objective, there is nothing in the proposed layout and overall development approach to suggest that anything more than lip service has been paid to this aspiration. It is in fact disingenuous for the report to cite a principle such as "Emphasis will be placed on quality public space, pedestrian environment, public parks and protection of biodiversity areas when in fact the proposed layout implies the large scale loss of areas designated as Critical Biodiversity Areas.

Biodiversity conservation aspects and ecological linkages are barely acknowledged in the proposed development approach and layout which fails to address a number of findings from the applicant's own specialist findings for the scoping phase, as well as various COJ policies and approved planning tools such as the COJ Wetland Protection and Management Plan, which highlight Modderfontein as having one of the most important wetland systems from a biodiversity perspective. The site now under consideration is a critical link area between open space areas and refuges on Huddle Park, and the greater Modderfontein area. The preliminary assessment undertaken by Bokamoso Landscape Architects and Environmental Consultants underscores the conservation importance of this site, identified a number of environmental sensitivities and conservation features identified as 'Irreplaceable' in terms of the Gauteng C Plan, including:

- Habitat for Red listed mammals
- Habitat for Red listed plants
- Orange listed plant habitat
- PPrimary vegetation
- Rivers and wetland
- Invertebrates, and
- Bird Life.

The report further highlights the likely impacts as inter alia

- Loss of sensitive grassland areas
- Possible red data flora and fauna species,
- Sensitive vegetation
- Loss of habitat
- Loss of movement corridor and lack of open space links.

The proposed layout does not appear to have made any attempt to deal with these issues, merely providing for a narrow riparian corridor, most of which is proposed as recreational parks for residents of the proposed development.

The proposed amended layout both appear to overlook these important conservation areas and make provision only for the protection of a narrowly defined, minimum wetland and riparian zone through the development.

Wetland protection and management

Both the original layout and the proposed amended layout do identify wetland areas associated with the watercourses that traverse the site. While the extent of wetlands does not necessarily preclude development on the entire site, the development would have to comply with the provisions of the approved COJ Catchment Management Policy be adhered to i.e. That the riparian zone/wetland and associated buffer zone of 30 metres from the outer edge of the wetland temporary zone be designated as sensitive and no development be permitted within such wetland and buffer zone or within the 1:100 year floodline, whichever is the greatest. In addition, the hydrological linkages and dependencies also need to be properly understood and protected within any development of the site. Given that the valley bottom wetland forms part of a continuous open space system it is required that this area be designated as sensitive and conserved in a manner which protects its ecological functions. As indicated, it is possible that increased buffers may be warranted for the site due to biodiversity, habitat and hydrological imperatives.

Even the applicant's own geotechnical report confirms the expected geotechnical constraints for the sites as being:

- Collapsible soil
- Seasonal shallow groundwater, perched groundwater and surface seepage near the floodplain,
- Moderate erodability of surficial soils and
- localised difficulty of excavation to 1.5 m depth

Further, the site is within Wetland Management Zone 1 as identified in the draft COJ Wetland Protection and Management Plan 2009. The plan identifies this as a priority zone for wetland management and further identifies the site under consideration as one of the priority areas for conservation and biodiversity protection. In terms of key management concerns for Wetland Management Zone 1, management of sediments and water quality are both identified as key, while pre-emptive engineering is advocated whereby sufficient space is maintained for the systems to adjust with little active intervention to the changes in hydrology or that active engineering is applied so as to ensure that wetland management objectives are met.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Storm Water Management

In regard to the two options proposed for the management of stormwater and drainage associated with the proposed development, while it is regarded as entirely premature to be

discussing the merits or demerits of particular stormwater management approaches for the site, when the principle of development per se has not yet been resolved, it should be noted that in-stream attenuation measures are NOT supported by this unit and are STRONGLY OPPOSED. Such in-stream interventions create undesirable barriers to the movement of species through the system, and can have a detrimental impact on aquatic life. The development, if approved, would have to provide for the necessary stormwater infrastructure and associated attenuation measures within the developable portion of the site itself, outside of the 1:100 year flood line and outside of any required riparian zone buffer or biodiversity buffer, and the following conditions would apply:

A storm water management plan will need to be submitted for the approval by both the Johannesburg Roads Agency and Environmental Management prior to the approval of the final Site Development Plan, and will be required to implement a storm water management scheme to meet the following criteria/standards:

- Peak discharge - no increase in discharge for any event of any duration up to the 25 year RI event
- Volume of runoff - no increase up to the annual 10 year rainfall
- Runoff frequency - no surface runoff for the 1 yr RI event of any duration
- Water Quality - no deterioration

Space allocation for storm water management must be indicated on the site development plan, outside of the wetland and wetland buffer areas or any environmentally sensitive areas. NO in-stream attenuation measures will be considered acceptable.

The storm water management plan should in any event minimize the generation of surface runoff and storm water through adopting the principles of Water Sensitive Urban Design (WSUDS) and Sustainable Urban Drainage Systems (SUDS) which provide various options such as bio-retention ponds, enhanced swales and grass lined channels, stone filled infiltration ditches, permeable paving etc. in order to minimize surface runoff and to maintain water quality.

It is also noted that any road crossings over the wetland or riparian areas would need to be restricted to a minimum, and would be required to be constructed as span bridges with the supports located outside of the riparian zone and buffer areas, and only minimal additional support pillars permitted as required to support the span, and subject to the detailed design being approved by both JRA AND Environmental Management.

Open Space Provision

In addition to conservation and protection of sensitive natural open space areas, provision would need to be made within the proposed residential areas for useable and accessible recreational parks in compliance with the COJ Open Space Framework standards and requirements to the satisfaction of the Environmental Management Department of COJ. No public open space contributions will be accepted in lieu of parkland

The Open Space Framework proposes that a standard of 2,4 ha per 1000 population of socio-economic open space be provided within Johannesburg. This would include parks, sports fields and hard open spaces such as urban squares, provided that such open spaces are easily accessible to the general public and not covered. It would however exclude traffic islands and parking areas, and also ecological and undeveloped open spaces such as protected areas high sensitivity vegetation and ridges or wetlands and associated buffers.

Land Use / Zonings

As stated above, it is considered entirely premature to be considering the town planning application prior to the availability of final detailed specialist environmental studies. Notwithstanding, should the principle of development of parts of the site be approved, consideration should be given to the recommendations of the draft Bio Regional Plan for Johannesburg and to the COJ Open Space Framework in regard to those land uses which are

appropriate to areas immediately adjacent to important biodiversity areas or sensitive environmental sites. This should be taken into account in terms of land use, detailed layouts, densities and typologies.

Layout

It is our view that consideration of the township should not be proceeded with until all the necessary detailed environmental specialist studies are available and a sound Strategic Environmental Assessment approach has been followed to inform any development approach for such an environmentally sensitive site which should inform the basic principles of any development approach and ensure that the interests of environmental sustainability and biodiversity protection have been adequately addressed and considered. It is our considered opinion that the current approach of fragmented township applications does not meet the requirements for holistic and sustainable development approach to such a precious site within the City and that the township applications are premature.

In light of the above, this division cannot support the proposed township or associated layout until the concerns and environmental issues highlighted above have been resolved.

Should you require further clarity on any of the above issues, please do not hesitate to contact me.

Regards

Jane Eagle

Assistant Director: Open Space Planning
Environmental Management

Tel: 587 4271
Fax: 5874273
Cell: 0824142431

Alfred

From: Bokamoso <lizelleg@mweb.co.za>
Sent: 23 June 2014 02:06 PM
To: user3@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: Anthrax

Flag Status: Flagged

From: Naomi Dinur [mailto:naomidinur@gmail.com]
Sent: 09 June 2014 01:58 PM
To: Bokamoso
Subject: Anthrax

Dear,
After reading my e-mail I noticed that it was unclear:
there is no relation between the Alexandra Anthrax outbreak in the year 1923,
and the death of Mrs Barbara Yudelowitz, the Rietfontein researcher.
I do not now the year her great aunt passed away, but there is no connection.

I spoke to Dr Mary Andre who worked many years at Rietfontein and remebers seeing bones excavated
from the Rietfontein grounds which was covered in lime.
This may indicate that the death was due to Antrax.
Kind regards,

Naomi Dinur
Hebrew Sworn Translator
Mobile: 0824961111

Alfred

From: Bokamoso <lizelleg@mweb.co.za>
Sent: 30 June 2014 08:49 AM
To: user3@bokamoso.net
Subject: FW: Graveyards
Attachments: An article form 1995.pdf

Flag Status: Flagged

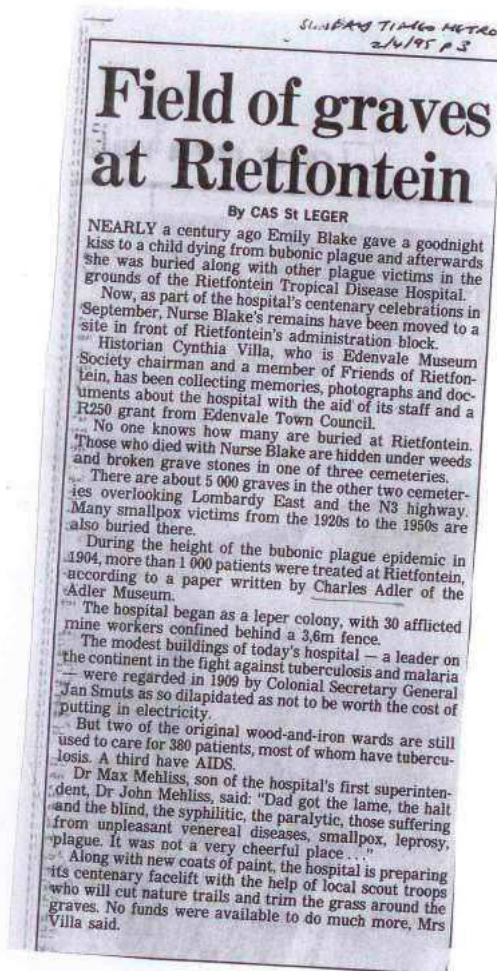
From: Naomi Dinur [mailto:naomidinur@gmail.com]
Sent: 28 June 2014 09:23 AM
To: Bokamoso
Subject: Graveyards

Dear,
you were looking for additional material regarding the graveyards.
I am overseas right now, but can give you the attached article.

There were several graveyards at Rietfontein, as mentioned in my previous mails to you.
The attached article mentions **two graveyards**,
overlooking Lombardy East and the N3
(I took all my pics in other graveyards one parallel to the police station and one overlooking the golf course,
and in 2014 deep about 200 meters away from the road at another graveyard/s)
the writer refers to **5000 graves in the other 2** graveyards,
In the book the hospital published they described a burial site along the river, which poses trouble to them
as the coffins made from wood had to be buried using heavy stones as they floated.... they mentioned that
later they buried overlooking the golf course...

I found a lead to more official material but as I am overseas till the 12th July, it will have to wait for my
return.

Naomi Dinur
Mobile: 0824961111



Alfred

From: Bokamoso <lizelleg@mweb.co.za>
Sent: 10 June 2014 08:56 AM
To: user3@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process
Attachments: image002.jpg; image003.jpg

Flag Status: Flagged

From: Thomas, Llewellyn [mailto:Llewellyn.Thomas@sncavalin.com]
Sent: 10 June 2014 08:31 AM
To: VERMAAK VINCENT (Bruma Auto); Wendy Machanik; 'Bokamoso'; wendysh@telkomsa.net; mj.lingenfelder@craigcor.co.za; gary.maulgue@gmail.com; gatewayhotel@mweb.co.za; cjvrensburg@iqgroup.net; j.golovey@hotmail.com; patrick.gems@actom.co.za; Jason Getz; gareth1747@gmail.com; ismailmossa@telkomsa.net; karin.betz1@gmail.com; peterch@intershu.co.za; mwkathyr@mweb.co.za; nina@taxidepot.co.za; sue@bundupower.co.za; sendnowl@mweb.co.za; glynis_stark@mweb.co.za; chappel@icon.co.za; Brendan@oceanbasket.com; nioannnou@yahoo.com; greg@bkds.co.za; Wbergmann@smithpower.co.za; kate@l-s-attorneys.co.za
Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

There appear to be attorneys listed amongst the addressees of this email, or certainly the trailing email. Is there still time for any legal issues to be heard....these matters are consistently left very late for public attention and participation.

There are many issues here...I tend to agree with Wendy about the health concerns..there are very real risks involved.

Apart from the threat of Ebola, the insensitivity towards burial sites and graves, the increased traffic congestion, more load on the electrical grid and property prices falling....Has anyone ever seen just how beautiful that area looks in Spring time early in the morning around 6am when the mist hangs in the little valley just above the river...it is so very pretty.

Regards,

Llewellyn Thomas, Pr Tech Eng

Piping Engineer
Engineering

Tel.: +27(0)11 535 4900 x 4630

SNC-Lavalin (Pty) Ltd.

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From: VERMAAK VINCENT (Bruma Auto) [mailto:vincent.vermaak@bmwdealer.co.za]
Sent: 10 June 2014 08:13 AM
To: Wendy Machanik; 'Bokamoso'; wendysh@telkomsa.net; mj.lingenfelder@craigcor.co.za; gary.maulgue@gmail.com; gatewayhotel@mweb.co.za; cjvrensburg@iqgroup.net; j.golovey@hotmail.com; patrick.gems@actom.co.za; Jason Getz; gareth1747@gmail.com; ismailmossa@telkomsa.net;

karin.betz1@gmail.com; peterch@intershu.co.za; mwkathyr@mweb.co.za; nina@taxidepot.co.za; sue@bundupower.co.za; sendnowl@mweb.co.za; glynis_stark@mweb.co.za; chappel@icon.co.za; Brendan@oceanbasket.com; nioannnou@yahoo.com; greg@bkds.co.za; Thomas, Llewellyn; Wbergmann@smithpower.co.za; kate@ls-attorneys.co.za
Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

I agree that we need legal representation.

Regards

Vince Vermaak
Managing Director
Phase IV Motor Investments (PTY) LTD
t/a Bruma Auto
Abrina 3765 (PTY) LTD
t/a Auto Alpina Boksburg
8 Kings Road, Bedfordview
P.O Box 751598, Gardenvue 2047
Phone: +27-11-201-0000
Fax: +27-11-201-0050
mailto: vincent.vermaak@bmwdealer.co.za
mailto: vince.vermaak@brumaauto.co.za
Url: <http://www.brumaauto.co.za/>

Registration number 2002/016444/07
This e-mail and its contents are subject to the Phase IV Motor Investments (Pty) Ltd
Trading as Bruma Auto email Legal notice.

Directors: V Vermaak, RP Magosi, BM Mathabathe, GR Vermaak, M Vermaak

From: Wendy Machanik [<mailto:wendy.machanik1@gmail.com>]
Sent: 09 June 2014 05:34 PM
To: 'Bokamoso'; wendysh@telkomsa.net; mj.lingenfelder@craigcor.co.za; gary.maulgue@gmail.com; gatewayhotel@mweb.co.za; civrensburg@iggroup.net; j.golovey@hotmail.com; patrick.gems@actom.co.za; Jason Getz; gareth1747@gmail.com; ismailmossa@telkomsa.net; karin.betz1@gmail.com; peterch@intershu.co.za; mwkathyr@mweb.co.za; nina@taxidepot.co.za; sue@bundupower.co.za; sendnowl@mweb.co.za; glynis_stark@mweb.co.za; chappel@icon.co.za; VERMAAK VINCENT (Bruma Auto); Brendan@oceanbasket.com; nioannnou@yahoo.com; greg@bkds.co.za; Llewellyn.Thomas@snclavalin.com; Wbergmann@smithpower.co.za; kate@ls-attorneys.co.za
Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

Hi all,

This is indicative of them going ahead with the development and using this as a ploy to prove our arguments wrong! If all these studies prove against us they will go ahead with the development in any case I feel that they have ignored the real crux of the matter which is the burial grounds and the disease – there is no impact study against both of those – does this mean they are going to ignore the public outcry? We need legal representation as the city does not seem to uphold protocol and doing what is right! Your call

From: Bokamoso [<mailto:lizelleq@mweb.co.za>]
Sent: 09 June 2014 04:43 PM
To: wendysh@telkomsa.net; mj.lingenfelder@craigcor.co.za; gary.maulgue@gmail.com; gatewayhotel@mweb.co.za; civrensburg@iggroup.net; j.golovey@hotmail.com; patrick.gems@actom.co.za; jasong@stanlec.co.za; gareth1747@gmail.com; ismailmossa@telkomsa.net; karin.betz1@gmail.com; peterch@intershu.co.za; mwkathyr@mweb.co.za; nina@taxidepot.co.za; sue@bundupower.co.za; sendnowl@mweb.co.za; glynis_stark@mweb.co.za; wendy.machanik1@gmail.com; chappel@icon.co.za; vincent.vermaak@bmwdealer.co.za; Brendan@oceanbasket.com; nioannnou@yahoo.com; greg@bkds.co.za; Llewellyn.Thomas@snclavalin.com;

Wbergmann@smithpower.co.za; kate@ls-attorneys.co.za

Subject: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

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We will keep you updated regarding the process in the future.

I trust you find the above in order.

Kind Regards

Juanita De Beer
Public Participation Consultant



**Landscape Architects &
Environmental Consultants**

T: (+27)12 346 3810 | F: (+27) 86 570 5659 | E: lizelleq@mweb.co.za | www.bokamoso.net
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

Alfred

From: Bokamoso <lizelleq@mweb.co.za>
Sent: 10 June 2014 09:02 AM
To: user3@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process
Attachments: image001.jpg

Flag Status: Flagged

From: VERMAAK VINCENT (Bruma Auto) [mailto:vincent.vermaak@bmwdealer.co.za]
Sent: 10 June 2014 08:13 AM
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mailto: vincent.vermaak@bmwdealer.co.za
mailto: vince.vermaak@brumaauto.co.za
Url: <http://www.brumaauto.co.za/>

Registration number 2002/016444/07
This e-mail and its contents are subject to the Phase IV Motor Investments (Pty) Ltd
Trading as Bruma Auto email Legal notice.

Directors: V Vermaak, RP Magosi, BM Mathabathe, GR Vermaak, M Vermaak

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kate@ls-attorneys.co.za

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We need legal representation as the city does not seem to uphold protocol and doing what is right!
Your call

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Sent: 09 June 2014 04:43 PM
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Subject: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

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Public Participation Consultant



**Landscape Architects &
Environmental Consultants**

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36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

Alfred

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Sent: 10 June 2014 01:02 PM
To: user3@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: Linksfeld Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process
Attachments: image001.jpg; 114061012551001301.png

Flag Status: Flagged

From: Michael Rubenstein [mailto:michaelr@bankservafrika.com]
Sent: 10 June 2014 12:55 PM
To: Bokamoso; Christo.Rootman@macrebar.co.za; harrishorwitz@global.co.za; rhona.topka@icloud.com; trevor@generalrolling.co.za; michaelshaps@gmail.com; diane@creativecats.co.za; carole@cimsolutions.co.za; Denise.Muller@arikairint.com; jonathan@berger.co.za; cam@camray.co.za; ikramer99@gmail.com; Anton.Jaffe@absa.co.za; mikkiemo@hotmail.com; Tjaffe@fmb.co.za; BarbaraBrink-Harley@flysaa.com; cara.cohen@kpmg.co.za; norman@normanbarling.co.za; rchono@global.co.za; Kfam@icon.co.za; michaho@absamail.co.za; nickig@icon.co.za; levinfam@netactive.co.za; nschafner@financialsearch.co.za; dinatomson@gmail.com; arthur@schafner.co.za
Subject: RE: Linksfeld Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

Has this ridiculous development not been stopped?!

Kind regards,

Michael Rubenstein (CMSA)
Head: Corporate Reputation and Brand
+2711 497 4399
+2782 903 7797
www.bankservafrika.com

From: Bokamoso [mailto:lizelle@mweb.co.za]
Sent: Tuesday, June 10, 2014 11:03 AM
To: Christo.Rootman@macrebar.co.za; harrishorwitz@global.co.za; rhona.topka@icloud.com; trevor@generalrolling.co.za; michaelshaps@gmail.com; diane@creativecats.co.za; carole@cimsolutions.co.za; Denise.Muller@arikairint.com; jonathan@berger.co.za; cam@camray.co.za; ikramer99@gmail.com; Anton.Jaffe@absa.co.za; mikkiemo@hotmail.com; Tjaffe@fmb.co.za; BarbaraBrink-Harley@flysaa.com; cara.cohen@kpmg.co.za; norman@normanbarling.co.za; rchono@global.co.za; Michael Rubenstein; Kfam@icon.co.za; michaho@absamail.co.za; nickig@icon.co.za; levinfam@netactive.co.za; nschafner@financialsearch.co.za; dinatomson@gmail.com; arthur@schafner.co.za
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Kind Regards

Juanita De Beer
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36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161



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Alfred

From: Bokamoso <lizelle@mweb.co.za>
Sent: 10 June 2014 02:40 PM
To: user3@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process
Attachments: image001.jpg; image002.jpg

Flag Status: Flagged

From: Wendy Machanik [mailto:wendy.machanik1@gmail.com]
Sent: 10 June 2014 02:14 PM
To: 'Thomas, Llewellyn'; 'VERMAAK VINCENT (Bruma Auto)'; 'Bokamoso'; wendysh@telkomsa.net; mj.lingenfelder@craigcor.co.za; gary.maulgue@gmail.com; gatewayhotel@mweb.co.za; cjvrensburg@iqgroup.net; j.golovey@hotmail.com; patrick.gems@actom.co.za; 'Jason Getz'; gareth1747@gmail.com; ismailmossa@telkomsa.net; karin.betz1@gmail.com; peterch@intershu.co.za; mwkathyr@mweb.co.za; nina@taxidepot.co.za; sue@bundupower.co.za; sendnowl@mweb.co.za; glynis_stark@mweb.co.za; chappel@icon.co.za; Brendan@oceanbasket.com; nioannnou@yahoo.com; greg@bkds.co.za; Wbergmann@smithpower.co.za; kate@ls-attorneys.co.za; 'Jacky Chalom'; 'Wayne Kopping'; 'A Vieve'
Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

Hi all,
Llewellyn is right we need to act fast and bring this to a halt – this is extremely serious
Possibly we need to collect from the whole community to start legal action.
We should call a meeting of property owners in all the areas adjoining and start a proper petition.
This takes action otherwise we can view our emails and council participation, purely as lip service.
It is up to us to act against this heinous action

From: Thomas, Llewellyn [mailto:Llewellyn.Thomas@snclavalin.com]
Sent: 10 June 2014 08:31 AM
To: VERMAAK VINCENT (Bruma Auto); Wendy Machanik; 'Bokamoso'; wendysh@telkomsa.net; mj.lingenfelder@craigcor.co.za; gary.maulgue@gmail.com; gatewayhotel@mweb.co.za; cjvrensburg@iqgroup.net; j.golovey@hotmail.com; patrick.gems@actom.co.za; Jason Getz; gareth1747@gmail.com; ismailmossa@telkomsa.net; karin.betz1@gmail.com; peterch@intershu.co.za; mwkathyr@mweb.co.za; nina@taxidepot.co.za; sue@bundupower.co.za; sendnowl@mweb.co.za; glynis_stark@mweb.co.za; chappel@icon.co.za; Brendan@oceanbasket.com; nioannnou@yahoo.com; greg@bkds.co.za; Wbergmann@smithpower.co.za; kate@ls-attorneys.co.za
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Apart from the threat of Ebola, the insensitivity towards burial sites and graves, the increased traffic congestion, more load on the electrical grid and property prices falling....Has anyone ever seen just how beautiful that area looks in Spring time early in the morning around 6am when the mist hangs in the little valley just above the river...it is so very pretty.

Regards,

Llewellyn Thomas, Pr Tech Eng

Piping Engineer
Engineering

Tel.: +27(0)11 535 4900 x 4630

SNC-Lavalin (Pty) Ltd.

NOTICE - This email message, and any attachments, may contain information or material that is confidential, privileged and/or subject to copyright or other rights. Any unauthorized viewing, disclosure, retransmission, dissemination or other use of or reliance on this message, or anything contained therein, is strictly prohibited and may be unlawful. If you believe you may have received this message in error, kindly inform the sender by return email and delete this message from your system. Thank you.

From: VERMAAK VINCENT (Bruma Auto) [mailto:vincent.vermaak@bmwdealer.co.za]
Sent: 10 June 2014 08:13 AM
To: Wendy Machanik; 'Bokamoso'; wendysh@telkomsa.net; mj.lingenfelder@craigcor.co.za; gary.maulgue@gmail.com; gatewayhotel@mweb.co.za; cjvrensburg@iqgroup.net; j.golovey@hotmail.com; patrick.gems@actom.co.za; Jason Getz; gareth1747@gmail.com; ismailmossa@telkomsa.net; karin.betz1@gmail.com; peterch@intershu.co.za; mwkathyr@mweb.co.za; nina@taxidepot.co.za; sue@bundupower.co.za; sendnowl@mweb.co.za; glynis_stark@mweb.co.za; chappel@icon.co.za; Brendan@oceanbasket.com; nioannnou@yahoo.com; greg@bkds.co.za; Thomas, Llewellyn; Wbergmann@smithpower.co.za; kate@ls-attorneys.co.za
Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

I agree that we need legal representation.

Regards

Vince Vermaak
Managing Director
Phase IV Motor Investments (PTY) LTD
t/a Bruma Auto
Abrina 3765 (PTY) LTD
t/a Auto Alpina Boksburg
8 Kings Road, Bedfordview
P.O Box 751598, Gardenvue 2047
Phone: +27-11-201-0000
Fax: +27-11-201-0050
mailto: vincent.vermaak@bmwdealer.co.za
mailto: vince.vermaak@brumaauto.co.za
Url: <http://www.brumaauto.co.za/>

Registration number 2002/016444/07
This e-mail and its contents are subject to the Phase IV Motor Investments (Pty) Ltd
Trading as Bruma Auto email Legal notice.

Directors: V Vermaak, RP Magosi, BM Mathabathe, GR Vermaak, M Vermaak

From: Wendy Machanik [mailto:wendy.machanik1@gmail.com]
Sent: 09 June 2014 05:34 PM
To: 'Bokamoso'; wendysh@telkomsa.net; mj.lingenfelder@craigcor.co.za; gary.maulgue@gmail.com; gatewayhotel@mweb.co.za; cjvrensburg@iqgroup.net; j.golovey@hotmail.com; patrick.gems@actom.co.za; Jason Getz; gareth1747@gmail.com; ismailmossa@telkomsa.net; karin.betz1@gmail.com; peterch@intershu.co.za; mwkathyr@mweb.co.za; nina@taxidepot.co.za; sue@bundupower.co.za; sendnowl@mweb.co.za; glynis_stark@mweb.co.za; chappel@icon.co.za; VERMAAK VINCENT (Bruma Auto); Brendan@oceanbasket.com; nioannnou@yahoo.com; greg@bkds.co.za; Llewellyn.Thomas@snclavalin.com; Wbergmann@smithpower.co.za; kate@ls-attorneys.co.za
Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

Hi all,
This is indicative of them going ahead with the development and using this as a ploy to prove our arguments wrong!
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I feel that they have ignored the real crux of the matter which is the burial grounds and the disease – there is no impact study against both of those – does this mean they are going to ignore the public outcry?
We need legal representation as the city does not seem to uphold protocol and doing what is right!
Your call

From: Bokamoso [<mailto:lizelleq@mweb.co.za>]
Sent: 09 June 2014 04:43 PM
To: wendysh@telkomsa.net; mj.lingenfelder@craigcor.co.za; gary.maulque@gmail.com; gatewayhotel@mweb.co.za; cjvrensburg@iqgroup.net; j.golovey@hotmail.com; patrick.gems@actom.co.za; jasonq@stanlec.co.za; gareth1747@gmail.com; ismailmossa@telkomsa.net; karin.betz1@gmail.com; peterch@intershu.co.za; mwkathyr@mweb.co.za; nina@taxidepot.co.za; sue@bundupower.co.za; sendnowl@mweb.co.za; glynis_stark@mweb.co.za; wendy.machanik1@gmail.com; chappel@icon.co.za; vincent.vermaak@bmwdealer.co.za; Brendan@oceanbasket.com; nioannnou@yahoo.com; greg@bkds.co.za; Llewellyn.Thomas@snclavalin.com; Wbergmann@smithpower.co.za; kate@ls-attorneys.co.za
Subject: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

Dear Interested and/or Affected Party Member,

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We will keep you updated regarding the process in the future.

I trust you find the above in order.

Kind Regards

Juanita De Beer

Public Participation Consultant



**Landscape Architects &
Environmental Consultants**

T: (+27)12 346 3810 | F: (+27) 86 570 5659 | E: lizelleq@mweb.co.za | www.bokamoso.net
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

Alfred

From: Bokamoso <lizelleq@mweb.co.za>
Sent: 11 June 2014 09:56 AM
To: user3@bokamoso.net
Cc: user1@bokamoso.net
Subject: FW: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

Importance: High

From: Wendy Machanik [<mailto:wendy.machanik1@gmail.com>]
Sent: 11 June 2014 09:51 AM
To: 'Nina'; 'Thomas, Llewellyn'; 'VERMAAK VINCENT (Bruma Auto)'; 'Bokamoso'; wendysh@telkomsa.net; mj.lingenfelder@craigcor.co.za; gary.maulque@gmail.com; gatewayhotel@mweb.co.za; cjvrensburg@iqgroup.net; j.golovey@hotmail.com; patrick.gems@actom.co.za; 'Jason Getz'; gareth1747@gmail.com; ismailmossa@telkomsa.net; karin.betz1@gmail.com; peterch@intershu.co.za; mwkathyr@mweb.co.za; sue@bundupower.co.za; sendnowl@mweb.co.za; glynis_stark@mweb.co.za; chappel@icon.co.za; Brendan@oceanbasket.com; nioannnou@yahoo.com; greg@bkds.co.za; Wbergmann@smithpower.co.za; kate@ls-attorneys.co.za; 'Jacky Chalom'; 'Wayne Kopping'; 'A Vieve'
Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process
Importance: High

Hi all,
Please will someone come forward to head up this process as I am not really qualified to do this – I do not actually live in the area – my sister and daughter do. I did have a house there but I recently sold it.
Possibly someone with a legal background. I am happy to still participate if it is legally permissible.
Thanks
Kindest regards
Wendy

From: Nina [<mailto:nina@taxidepot.co.za>]
Sent: 11 June 2014 06:57 AM
To: Wendy Machanik; 'Thomas, Llewellyn'; 'VERMAAK VINCENT (Bruma Auto)'; 'Bokamoso'; wendysh@telkomsa.net; mj.lingenfelder@craigcor.co.za; gary.maulque@gmail.com; gatewayhotel@mweb.co.za; cjvrensburg@iqgroup.net; j.golovey@hotmail.com; patrick.gems@actom.co.za; 'Jason Getz'; gareth1747@gmail.com; ismailmossa@telkomsa.net; karin.betz1@gmail.com; peterch@intershu.co.za; mwkathyr@mweb.co.za; sue@bundupower.co.za; sendnowl@mweb.co.za; glynis_stark@mweb.co.za; chappel@icon.co.za; Brendan@oceanbasket.com; nioannnou@yahoo.com; greg@bkds.co.za; Wbergmann@smithpower.co.za; kate@ls-attorneys.co.za; 'Jacky Chalom'; 'Wayne Kopping'; 'A Vieve'
Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

Let us know if we can help.

Regards

Nina Lahner
Operations Director
Taxi Depot
084 625 1001
nina@taxidepot.co.za
lahner.nina@gmail.com

----- Original message -----

From: Wendy Machanik <wendy.machanik1@gmail.com>

Date: 10/06/2014 14:13 (GMT+02:00)

To: "Thomas, Llewellyn" <Llewellyn.Thomas@snclavalin.com>, "VERMAAK VINCENT (Bruma Auto)" <vincent.vermaak@bmwdealer.co.za>, 'Bokamoso' <lizelleg@mweb.co.za>, wendysh@telkomsa.net, mj.lingenfelder@craigcor.co.za, gary.maulgue@gmail.com, gatewayhotel@mweb.co.za, cjvrensburg@iqgroup.net, j.golovey@hotmail.com, patrick.gems@actom.co.za, 'Jason Getz' <jasong@stanlec.co.za>, gareth1747@gmail.com, ismailmossa@telkomsa.net, karin.betz1@gmail.com, peterch@intershu.co.za, mwkathyr@mweb.co.za, nina@taxidepot.co.za, sue@bundupower.co.za, sendnowl@mweb.co.za, glynis_stark@mweb.co.za, chappel@icon.co.za, Brendan@oceanbasket.com, nioannnou@yahoo.com, greg@bkds.co.za, Wbergmann@smithpower.co.za, kate@ls-attorneys.co.za, 'Jacky Chalom' <chalom@global.co.za>, 'Wayne Kopping' <wgekopp@gmail.com>, 'A Vieve' <gkop613@gmail.com>

Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

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To: VERMAAK VINCENT (Bruma Auto); Wendy Machanik; 'Bokamoso'; wendysh@telkomsa.net; mj.lingenfelder@craigcor.co.za; gary.maulgue@gmail.com; gatewayhotel@mweb.co.za; cjvrensburg@iqgroup.net; j.golovey@hotmail.com; patrick.gems@actom.co.za; Jason Getz; gareth1747@gmail.com; ismailmossa@telkomsa.net; karin.betz1@gmail.com; peterch@intershu.co.za; mwkathyr@mweb.co.za; nina@taxidepot.co.za; sue@bundupower.co.za; sendnowl@mweb.co.za; glynis_stark@mweb.co.za; chappel@icon.co.za; Brendan@oceanbasket.com; nioannnou@yahoo.com; greg@bkds.co.za; Wbergmann@smithpower.co.za; kate@ls-attorneys.co.za

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Regards,

Llewellyn Thomas, Pr Tech Eng

Piping Engineer
Engineering

Tel.: +27(0)11 535 4900 x 4630

SNC-Lavalin (Pty) Ltd.

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From: VERMAAK VINCENT (Bruma Auto) [<mailto:vincent.vermaak@bmwdealer.co.za>]

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Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

I agree that we need legal representation.

Regards

Vince Vermaak

Managing Director

Phase IV Motor Investments (PTY) LTD

t/a Bruma Auto

Abrina 3765 (PTY) LTD

t/a Auto Alpina Boksburg
8 Kings Road, Bedfordview
P.O Box 751598, Gardenview 2047
Phone: +27-11-201-0000

Fax: +27-11-201-0050
mailto: vincent.vermaak@bmwdealer.co.za

mailto: vince.vermaak@brumaauto.co.za
Url: <http://www.brumaauto.co.za/>

Registration number 2002/016444/07
This e-mail and its contents are subject to the Phase IV Motor Investments (Pty) Ltd
Trading as Bruma Auto email Legal notice.

Directors: V Vermaak, RP Magosi, BM Mathabathe, GR Vermaak, M Vermaak

mwkathyr@mweb.co.za; nina@taxidepot.co.za; sue@bundupower.co.za; sendnowl@mweb.co.za;
glynis_stark@mweb.co.za; wendy.machanik1@gmail.com; chappel@icon.co.za; vincent.vermaak@bmwdealer.co.za;

From: Wendy Machanik [<mailto:wendy.machanik1@gmail.com>]

Sent: 09 June 2014 05:34 PM

To: 'Bokamoso'; wendysh@telkomsa.net; mj.lingenfelder@craigcor.co.za; gary.maulgue@gmail.com;
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patrick.gems@actom.co.za; Jason Getz; gareth1747@gmail.com; ismailmossa@telkomsa.net;
karin.betz1@gmail.com; peterch@intershu.co.za; mwkathyr@mweb.co.za; nina@taxidepot.co.za;
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VERMAAK VINCENT (Bruma Auto); Brendan@oceanbasket.com; nioannnou@yahoo.com;
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Sent: 09 June 2014 04:43 PM

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gareth1747@gmail.com; ismailmossa@telkomsa.net; karin.betz1@gmail.com; peterch@intershu.co.za;

Alfred

From: Bokamoso <lizelleq@mweb.co.za>
Sent: 11 June 2014 02:11 PM
To: user3@bokamoso.net
Subject: FW: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process
Attachments: image001.jpg

Flag Status: Flagged

From: Jeanette [mailto:payroll@7seventy.co.za]
Sent: 11 June 2014 01:51 PM
To: 'Sender Lees'
Cc: Bokamoso
Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

TO WHOM IT MAY CONCERN

This is to state, that I agree with Sender & Zelda Lees.
I have objected to this proposal from the start.
I have also written many letters stating that I object to this proposal.

Many thanks,
Jeanette

From: Sender Lees [mailto:sender.lees@gmail.com]
Sent: 09 June 2014 04:39 PM
To: Bokamoso
Cc: John.DeMeyer@za.sabmiller.com; terencekap@yahoo.co.uk; Cecile Schlesinger; Tanya@sothebysrealty.co.za; gfc@netactive.co.za; lovingnature@telkomsa.net; payroll@7seventy.co.za; Issy Miller; gsacks@imagnet.co.za; shellygetz@gmail.com; harryk@mweb.co.za; greg@vanesch.co.za; brenda@olafilms.tv; jenny.saltz@colbar.co.za; raena@fishgroup.co.za; regs@mwebbiz.co.za; rebesa@icon.co.za; BarryS@boston.co.za; admonfam@gmail.com; rinaf@justbloom.co.za; superfluid7@gmail.com; shapsr@gmail.com; Chris@burgessplumbing.co.za; allan@winik.za.net; danielrodrigues@mwebbiz.co.za; Cgr@myconnection.co.za
Subject: Re: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

Hi Bokamoso
Thanks for keeping us updated, we are really very unhappy with the proposed scheme
Which forum do we refer to, to raise our objection
Thanks
Sender & Zelda Lees

On 9 June 2014 17:03, Bokamoso <lizelleq@mweb.co.za> wrote:

Dear Interested and/or Affected Party Member,

Please refer to the attached Public Notice regarding the *Environmental Impact Assessment (EIA) Phase* for the proposed *Linksfield Mixed Use Development / also referred to as the proposed Sunningdale X13, X14, X15, X16, X17, X18, X19 & X20 (in the Town Planning Application)*.

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I trust you find the above in order.

Kind Regards

Juanita De Beer

Public Participation Consultant



Landscape Architects &

Environmental Consultants

T: [\(+27\)112 346 3810](tel:+271123463810) | F: [\(+27\) 86 570 5659](tel:+2711865705659) | E: lizelleq@mweb.co.za | www.bokamoso.net

36 Lebonbo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

Sender

Phone home +27(0)11 6407160

Fax +27 (0) 866 206 110 fax to email

Cell +27828808586

P.S. Think before you print! Must you really print this letter? 90% of documents are filed and forgotten. You can save the documents and read them from your computer screen. Save paper - save the forests, help the environment.

Alfred

From: Bokamoso <lizelleg@mweb.co.za>
Sent: 11 June 2014 04:22 PM
To: user1@bokamoso.net; user3@bokamoso.net
Subject: FW: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process
Attachments: image002.jpg; image003.jpg

Flag Status: Flagged

From: Zabeth Zuhlsdorff [mailto:ZZuhlsdorff@randaid.co.za]
Sent: 11 June 2014 04:16 PM
To: 'Bokamoso'
Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

Dear Juanita/Ane

Thank you for the notice. Please keep us informed of progress. We would also like to be kept informed of all documentation pertaining to the WULA (water use license application) and reserve the right to comment on said documents.

Kind regards
Zabeth



Zabeth Zuhlsdorff | Head Office | GM Services and Advance Division | Private Bag X03
Lyndhurst 2106
Corner Modderfontein Rd & Wordsworth | Cell: +27 83 501 8491 | Tel: +27 11 882
2510 | Ext 291
Direct Tel: +27 11 430 2039 | Fax: +27 11 882 4670 | NPO Number 000 605 |
Email: zzuhlsdorff@randaid.co.za

From: Bokamoso [mailto:lizelleg@mweb.co.za]
Sent: 09 June 2014 02:36 PM
To: martin.bekker@ekurhuleni.gov.za; Nosiphiwo.Mqaga@ekurhuleni.gov.za; Ivan.Kadungure@ekurhuleni.gov.za;
Marius.vHuyssteen@ekurhuleni.gov.za; claudio.vigliotta@outlook.com; leentadevilliers@vodamail.co.za;
iorton@gibb.co.za; dennyr@mweb.co.za; m.ritchie@bowman.co.za; christiecollier@gmail.com; jeanine@llinc.co.za;
Zabeth Zuhlsdorff; Rae Brown; ian@llinc.co.za; bill.rundle@ekurhuleni.gov.za; cybil@chai.co.za;
Leonora.Boer@lake.co.za; druce@mweb.co.za; benita958@gmail.com; brohrs@aberdare.co.za; jhb kilo2@csso.org.za;
laserson@telkomsa.net; barbara@beyachad.co.za; ama.dirk@mweb.co.za; Yael.Pollak@liberty.co.za
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We will keep you updated regarding the process in the future.

I trust you find the above in order.

Kind Regards

Juanita De Beer

Public Participation Consultant



**Landscape Architects &
Environmental Consultants**

T: (+27)12 346 3810 | F: (+27) 86 570 5659 | E: lizelleq@mweb.co.za | www.bokamoso.net
36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

Alfred

From: Bokamoso <lizelleq@mweb.co.za>
Sent: 18 June 2014 03:51 PM
To: user3@bokamoso.net; user1@bokamoso.net
Subject: FW: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process
Attachments: image001.jpg

From: Clare Rossouw [mailto:clare.rossouw@afrihost.co.za]
Sent: 18 June 2014 03:48 PM
To: 'Bokamoso'
Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

Thank you for keeping me updated. In Bokamoso. Appreciated. I am very interested and concerned for our joint future. Clare Rossouw

Clare Russouw
Email : clare.russouw@afrihost.co.za
Cell (072) 208 5056

From: Bokamoso [mailto:lizelleq@mweb.co.za]
Sent: 11 June 2014 11:16 AM
To: rosy.paikin@gmail.com; evojd@gmail.com; joe@cdy.co.za; Arnold.t@vodamail.co.za; Claire@energyoil.co.za; joybishop@vodamail.co.za; ann@siyaya.co.za; attwellds@gmail.com; Lynnvonbratt25@gmail.com; cvanwgh@dunns.co.za; kayv@absamail.co.za; redberryridge@hotmail.com; nm.d@live.co.za; Vivian.wilson@lifehealthcare.co.za; aerasmus@randaid.co.za; Shirls.dup@gmail.com; Maureen@pctec.co.za; briansylvia@worldonline.co.za; mommyd@mweb.co.za; clare.rossouw@afrihost.co.za; valu@telkomsa.net; ethne.geoghegan@gmail.com; joyber@mweb.co.za; niliusmf@telkomsa.net; lucyfergs@wirelessza.co.za; sholens@mweb.co.za; arthurkarp@telkomsa.net; bertie.goldstein@gmail.com; aubel@icon.co.za; derekgray@xsinet.co.za
Subject: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

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Alfred

From: Bokamoso <lizelleq@mweb.co.za>
Sent: 18 June 2014 04:41 PM
To: user3@bokamoso.net; user1@bokamoso.net
Subject: FW: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process
Attachments: image001.jpg

From: Jenny Ravenscroft [<mailto:thecroft@mweb.co.za>]
Sent: 18 June 2014 02:52 PM
To: 'Bokamoso'
Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

I only hope that the powers that be can look at themselves in the mirror. This is a disaster just waiting to happen.

From: Bokamoso [<mailto:lizelleq@mweb.co.za>]
Sent: 10 June 2014 02:21 PM
To: slingerland@mweb.co.za; yzimble@gmail.com; christineosler@gmail.com; kevin@versusconstruction.co.za; sauih@global.co.za; dmoftat@legacygroup.co.za; peta@boston.co.za; salesexec9@kia.co.za; Galva.Oster@standardbank.co.za; gevurah18@gmail.com; aubel@icon.co.za; vicalley@gmail.com; kevin.myers@hotmail.com; jackiesmith029@gmail.com; gilynne55@gmail.com; cykanth@gmail.com; samanthakatestep@gmail.com; kletz6@gmail.com; philip-phd@telkomsa.net; val.hawker@btinternet.com; intemike@mweb.co.za; thecroft@mweb.co.za; rory.gaddin@gmail.com; leeann.baum@gmail.com; heyns@acenet.co.za; hack@intekom.co.za; ym.heather@gmail.com
Subject: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

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36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

Alfred

From: User1 <user1@bokamoso.net>
Sent: 19 June 2014 10:15 AM
To: user3@bokamoso.net; Maretha
Subject: FW: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process
Attachments: image001.jpg; ~WRD000.jpg

Anè Agenbacht

Senior Environmental Assessment Practitioner / Manager

Tel: 012-346 3810

Cell: 083 533 0420

Email: lizelleg@mweb.co.za (Attention: Anè)



**Landscape Architects &
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36 Lebombo Street, Ashlea Gardens, Pretoria | P.O. Box 11375 Maroelana 0161

From: Bokamoso [mailto:lizelleg@mweb.co.za]
Sent: Thursday, June 19, 2014 8:01 AM
To: user1@bokamoso.net
Subject: FW: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

From: Jenny Ravenscroft [mailto:thecroft@mweb.co.za]
Sent: 18 June 2014 06:24 PM
To: 'Lizelle Gregory'
Cc: hobsien@gmail.com
Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

Dear Lizelle,

I am concerned that the application for re-zoning has been submitted BEFORE receipt of any report with regard to the impact of disease on the surrounding communities not to mention the overloading of the current road and communication infrastructure which is already under considerable pressure.

Kind regards

Jenny

From: Lizelle Gregory [<mailto:lizelleg@mweb.co.za>]
Sent: 18 June 2014 05:12 PM
To: 'Jenny Ravenscroft'
Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

Dear Jenny

Thank you for your reply. Please elaborate on your statement. Your inputs will assist, because we are currently investigation all the issues as listed by the I & APs. We appointed a team of specialists (the best in South-Africa) to assist with all the issues, especially the issues/ objections relating to the diseases that were treated in the hospital.

As EAPs we cannot afford to make any recommendations that cannot be justified and you can be certain that none of the specialists involved will take any chances with recommendations and findings that are made and certified by them.

The full report with the specialist inputs will be made available for comment and the report will also undergo a special specialist review process. This was a special request from the delegated authority.

Regards

Lizelle Gregory

Bokamoso Landscape Architects and Environmental Consultants CC
BLarch (UP)
Professional Member at SACLAP
Practise Number: 97807

Cell: 083 255 838 4
Tel: (012) 346-3810
Fax: 086 570 565 9

From: Jenny Ravenscroft [<mailto:thecroft@mweb.co.za>]
Sent: 18 June 2014 02:52 PM
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Subject: RE: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

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Subject: Linksfield Mixed Use / Sunningdale X13-X20 - EIA Public Participation Process

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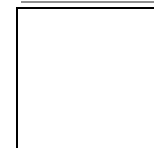
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