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DRAFT PART 2 AMENDMENT REPORT

PROPOSED PART 2 AMENDMENT OF AUTHORISATION REF DC22/0061/08 & DC22/AMEND/0061/2018 (AREA B OF THE HILTON MONDI DEVELOPMENT, UMNGENI LOCAL MUNICIPALITY)

EDTEA REF: *DC22/0061/2008/AMEND/2018/2020*

NOVEMBER 2020
REVISION 0

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95 YEARS OF ENGINEERING EXCELLENCE

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SYNOPSIS

Part 2 Amendment report for the proposed establishment of a school on Area B of the Hilton Mondi Development

KEY WORDS:

Part 2 Amendment, uMngeni Local Municipality

QUALITY VERIFICATION

This report has been prepared under the controls established by a quality management system that meets the requirements of ISO 9001: 2015 which has been independently certified by DEKRA Certification.

Verification	Capacity	Name	Signature	Date
By Author	Environmental Scientist	R. Patak		11.11.20
Checked by:	Senior Environmental Scientist	K. Brent		11.11.20
Authorised by:	Executive Associate	Magnus van Rooyen		11.11.20

File:	W:\Enviro\JGA\5344 - Small Environmental Projects (JR)\9. Kings School Part 2 Amendment (Junxion)\Report

Report template version: 2017-10-30

INFORMATION REQUIRED BY TH COMPETENT AUTHORITY

The Environmental Impact Assessment (EIA) Regulations, promulgated in terms of the National Environmental Management Act (NEMA, Act no. 107 of 1998 as amended) dated 8th of December 2014, were amended on the 7th of April 2017. In terms of Section 32 of Chapter 5 of the amended EIA Regulations (2014, as amended 2017), an Amendment Report must accompany the application made in terms of Section 31 and must include –

CONTENTS OF THE AMENDMENT REPORT	
32 (1) The applicant must within 90 days of receipt by the competent authority of the application made in terms of regulation 31, submit to the competent authority –	
(a) A report, reflecting –	
i. An assessment of all impacts related to the proposed change;	**Chapter 5**
ii. Advantages and disadvantages associated with the proposed change; and	**Chapter 6**
iii. Measures to ensure avoidance, management and mitigation of impacts associated with such proposed change; and	**Chapter 5**
iv. Any changes to the EMPr;	**Chapter 7**
Which report –	
aa. Had been subjected to a Public Participation Process (PPP), which had been agreed to by the competent authority, and which was appropriate to bring the proposed change to the attention of potential and registered interested and affected parties, including organs of state, which have jurisdiction in respect of any aspect of the relevant activity, and the competent authority, and	**Chapter 8 & Appendix I**
bb. Reflects the incorporation of comments received, including any comments of the competent authority; or	**TBC**
(b) A notification in writing that the report will be submitted within 140 days of receipt of the application by the competent authority, as significant changes have been made or significant new information has been added to the report, which changes or information was not contained in the report consulted on during the initial PPP contemplated in sub-regulation (1) (a) and that the revised report will be subjected to another PPP of at least 30 days.	**N/A**
32 (2) In the event where sub-regulation (1) (b) applies, the report, which reflects the incorporation of comments received, including any comments of the competent authority, must be submitted to the competent authority within 140 days of receipt of the application by the competent authority.	

PROPOSED PART 2 AMENDMENT OF AUTHORISATION REF DC22/0061/08 & DC22/AMEND/0061/2018 (AREA B OF THE HILTON MONDI DEVELOPMENT, UMNGENI LOCAL MUNICIPALITY)

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DEFINITIONS AND ACRONYMS

Development **–** means the building, erection, construction or establishment of a facility, structure or infrastructure, including associated earthworks or borrow pits, that is necessary for the undertaking of a listed or specified activity, but excludes any modification, alteration or expansion of such a facility, structure or infrastructure, including associated earthworks or borrow pits, and excluding the redevelopment of the same facility in the same location, with the same capacity and footprint.

Development Footprint – in respect of land, means any evidence of its physical transformation as a result of the undertaking of any activity.

DWS – Department of Water and Sanitation

EA – Environmental Authorisation

EAP – Environmental Assessment Practitioner

ECO – Environmental Control Officer

EDTEA **-** Department of Economic Development, Tourism and Environmental Affairs

Environment – means the surroundings within which humans exist and that are made up of

(a) The land, water and atmosphere of the earth;
(b) Micro-organisms, plant and animal life;
(c) Any part or compilation of (a) and (b) and the interrelationships among and between them; and
(d) The physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well-being.

Phased Activities – means an activity that is developed in phases over time on the same or adjacent properties to create a single or linked entity, but excludes any activity for which an environmental authorisation has been obtained in terms of the Act or the Environment Conservation Act, 1989 (ECA, Act No. 73 of 1989).

Watercourse – means –

(a) a river or spring;
(b) a natural channel in which water flows regularly or intermittently;
(c) a wetland, pan, lake or dam into which or from which, water flows; and any collection of water which the Minister may, by notice in the Gazette, declare to be a watercourse as defined in the National Water Act, 1998 (NWA, Act No. 36 of 1998); and

reference to a watercourse includes, where relevant, its bed and banks.

Wetland – means land which is transitional between terrestrial and aquatic systems where the water table is usually at or near the surface, or the land is periodically covered with shallow water, and which land in normal circumstances supports or would support vegetation typically adapted to life in saturated soil.

1 INTRODUCTION AND BACKGROUND

A Basic Assessment Process was completed for the proposed establishment of mixed use development known as the Hilton Mondi Development. The applicant obtained a positive Environmental Authorisation (EA) for the abovementioned project Ref: DC22/0061/08 (Appendix A.1) for the development of 5 areas. Monzali Property Management Company (Pty) Ltd purchased Areas B and C of the original authorisation and requested and amendment to the Environmental Authorisation due to the change in landowner. As a result, on 9 March 2018, DC22/Amend/0061/2018 was granted (Appendix A.2).

There are three components to this proposed amendment to the Environmental Authorisation, these being as follows:

- Amendment to the name of the Authorisation Holder from Monzali Property Management Company (Pty) Ltd to Edinvest Schools Operations (Pty) Ltd for Area B only.
- Amendment of the Environmental Authorisation to change the land use of Area B only, currently Business Park and Office Use, to a School use.
- Amendment of the Environmental Authorisation to permit the temporary use of a conservancy tank for effluent management on the site until such time as the uMngeni Water Hilton Waste Water Treatment Works is constructed and operational.

It must be noted that this amendment is specific to Area B only (Portion 368 (of 212) of the Farm Drie Fontein No. 952). Within the original Environmental Authorisation, DC22/0061/08, Area B was approved for 4.5 hectares of Business Park and Warehousing incorporating 3.7 hectares of Business Park and Warehousing and 0.8 hectares of open space.

As per GN R326 of the EIA Regulations, 2014 (as amended), a Part 2 Amendment Process must be undertaken accordingly by the Environmental Assessment Practitioner (EAP). Ultimately, the outcome of the Amendment Process is to provide the Competent Authority, the EDTEA, with sufficient information to provide a decision on the Amendment Application in terms of Environmental Authorisation (EA), in order to avoid or mitigate any detrimental impacts that the new activity may inflict on the receiving environment.

JG Afrika (Pty) Ltd has been appointed by Monzali Property Management Company (Pty) Ltd to undertake Part 2 Amendment Process. An application for a Part 2 amendment of the Environmental Authorisation was submitted to EDTEA on 9 November 2020 and a reference number of DC22/0061/2008/AMEND/2018/2020 was issued (Appendix A.3).

2 PROJECT TEAM

2.1 The Environmental Assessment Practitioner (EAP)

JG Afrika (Pty) Ltd is an engineering and environmental consulting firm with a complement of some 300 staff comprising engineers, environmental scientists, specialist professionals and administrative staff, all working together with the common goal of providing the highest quality of consulting engineering and environmental services, for the benefit of the community and the environment.

Apart from the main operating company the JG Afrika Group also comprises of specialist companies operating in the fields of rail transportation, geotechnical, hydrological and environmental services, pavement

technology, water management, and social development, and has a minority share in an empowerment consultancy specialising in sanitation.

According to the EIA Regulations, 2014 (as amended), it is necessary for the Applicant to appoint an independent Environmental Assessment Practitioner (EAP) who will adhere to the Environmental Regulations and complete the applicable environmental process on behalf of the Applicant. JG Afrika (Pty) Ltd has been appointed as the EAP in this regard for the proposed Amendment application process. Details of the qualified EAPs involved in undertaking the Amendment Process are noted in Table 2 and the Curriculum Vitae (CV) of the relevant EAPs attached as Appendix B.

Table 1: Details of the EAP

EAP	Qualifications & Professional affiliations	Experience at environmental assessments	Contact details
Mr M. van Rooyen Executive Associate	BSc, BSc Hons, MPhil. (Environmental Management), Pr. Sci. Nat, IAIAsa	14 years	JG Afrika (Pty) Ltd Tel: (033) 343 6789 Email: vanrooyenm@jgafrika.com
Ms R. Patak Environmental Scientist	BSc. Hons. Environmental Science, IAIAsa, GISSA	7.5 years	JG Afrika (Pty) Ltd Tel: (033) 343 6789 Email: patakr@jgafrika.com

3 PROJECT DESCRIPTION

3.1 The proposed development site -

The table below provides a description of the proposed development site

Table 2: Property description

District Municipality	Umgungundlovu District Municipality
Local Municipality	uMngeni Local Municipality
Property location	Hilton
Farm/Erf name(s) & number(s) (including portion) of all proposed sites	Portion 368 (of 212) of the Farm Drie Fontein No. 952
Property size(s) (m^2) of all proposed sites	3.7 hectares of Business Park and Warehousing and 0.8 hectares of open space. Proposed School: 2.6 hectares in size
Development footprint size(s) in m^2:	Development of 2.6 hectares of the property is proposed: The school will consist of double story buildings which consist of: Ground Floor: • Admin – 261.32m^2 • Change rooms – 112.13m^2 • Classrooms – 1374.08m^2 • Cleaners Store – 13.21m^2 • Hall – 582.45m^2 • Kitchen – 60.31m^2 • Operations Area – 192.16m^2 • Roadways – 3991.51m^2 • S Classroom – 306.37m^2 • S Classroom Extension – 142.02m^2 • Security – 11.18m^2

	• Staff Room – 84.28m^2 • Store – 46.61m^2 • Tuck shop – 22.48m^2 • WC – 208.14m^2 Ground Floor Area – 7408.28m^2 Level 1: • Admin – 235.1m^2 • Classroom – 1065.61m^2 • Media Centre – 115.21m^2 • S Classroom – 303.16m^2 • S Classroom Extension – 142.02m^2 • Walkways – 1968.44m^2 First Floor Area – 9376.60m^2 In addition to the construction of buildings, the following will need to be developed / provided / constructed: Three mixed use sports fields. The site area to be developed is approximately 2,65 hectares.
SG Digit code(s) of all proposed sites:	N0FT00000000095200212

Central coordinates of the development site					
Latitude (S)			**Longitude (E)**		
30°	16’	59.31” S	29°	32’	20.08” E

The location of the proposed development sites is shown in Figure 1.

3.2 The proposed development concept -

The project description is as follows:

As mentioned above, there are three components to this proposed amendment to the Environmental Authorisation, these being as follows:

- Amendment to the name of the Authorisation Holder from Monzali Property Management Company (Pty) Ltd to Edinvest Schools Operations (Pty) Ltd for Area B only.
- Amendment of the Environmental Authorisation to change the land use of Area B only, currently Business Park and Office Use, to a School use.
- Amendment of the Environmental Authorisation to permit the temporary use of a conservancy tank for effluent management on the site until such time as the uMngeni Water Hilton Waste Water Treatment Works is constructed and operational.

As mentioned above, 3.7 hectares of Business Park and Warehousing and 0.8 hectares of open space has been approved within the original EA however only 2,65 hectares will be utilised within this development. The proposed draft concept layout has been included as Appendix C.

Area B:

The platform and associated services have been established on site as part in line with the original EA. Edinvest Schools Operations (Pty) Ltd (Edinvest Schools) is purchasing apportion of the site known as Area B, located adjacent to the National Route 3 and behind the Rotunda Center, and proposes the development of a school which caters for learners from Grade R to Grade 12. This school will be developed in Phases commencing in early 2021.

As per the prospectus (Appendix D):

From January to June 2021 Etham College will operate from the existing King's School located in Nottinham Road, as the college is being built in Hilton. Day scholars from Hilton will be offered access to a daily bus service. Boarders will initially be housed in Loxley House in Nottingham Road and relocate in July 2021 to boarding in Hilton.

Edinvest schools offer personalised blended learning, enabling adaptability and flexibility in our new covid world. Etham College will emphasise Christian based, technologically innovative, socially conscious learning. Etham College is set to offer learners an experience where academic excellence is realised through tech savvy educators within an Individualised Blended Learning Model, 21st Century Skills Development, Entrepreneurship Masterclasses, EQ Development Programme, Tech enabled teaching and learning environments and homely boarding facilities.

The school will feature an Innovation Hall, 38 Learning Venues, and dedicated Robotics, Technology and Science Labs. A variety of sports offering will include Soccer, Netball, Basketball, and Athletics.

From a bulk services perspective the following is proposed in terms of servicing the development:

- Water will be sourced by Municipal Supply;
- Electricity will be sourced from ESKOM;
- The Hilton Water treatment works is not currently operational and is anticipated to become operational in December 2021. As a result, a temporary conservancy tank will be used from June 2021 to December 2021.

Temporary Conservancy Tank

As per the Engineering Letter (Appendix E):

A temporary conservancy tank option will be utilised for the temporary storage of effluent, until the new outfall sewer and Hilton WWTW becomes operational – this is estimated by Umgeni Water to be by December 2021. In the interim, it is proposed to accommodate the first intake into Etham College by linking the sewer system into a conservancy tank.

Tank specifications and Installation:

The Calcamite tank is a prefabricated tank with an inlet to receive the sewage and has two access lids used during maintenance and emptying of the tanks by a vacuum tanker.

Following excavation, a blinding layer of concrete is laid on the insitu material. A concrete slab is required where the base of the excavation is unstable, clayey or has a high watertable. In situations where ground water is a perennial problem, the Engineer may prescribe an under (concrete slab) drain of single size concrete stone to convey the water away from the area. This is not anticipated however will be reviewed during construction.

Volumes and Frequency of cleaning

The volume calculations are based on 150 learners and 30 staff, being 180 at a consumer/consumption rate of 30l/p/day. According to the SANS 10252 regulations the rate varies between 40-50l/p/day, which is considered to be conservative compared to the Redbook guideline of 20l/p/day. The 180 people @ 30l/p/day equates to a total of 5,400litres per day which requires a 9500litre Calcamite tank, which allows for almost two days of storage. For safety measures, 2 x 9500litre tanks will be installed, phased based on volume

requirements. The tanks will operate on two different float switches, 50% and 80% of capacity, respectively. Once these levels within the tank is reached, signals will be sent to the contracted service provider responsible for effluent removal using vacuum tankers. The conservancy tank will have to be emptied every 2nd day, although this could change depending on usage, however, this is all controlled by the float switches and telemetry.

Mitigation

Although the 2 x 9500litre tanks have approximately 4 days storage capacity, it is suggested that as part of mitigation measures for an overflow, earth berms not exceeding 1m in height be constructed around the tanks. This berm will prevent overflows into the nearby wetland area. It should however be noted that the risk of overflow is low, as effluent levels will be controlled and managed by two float switches, linked to the service provider and the maintenance manager at the school.

The School will link into the Hilton WWTW by December 2021, after which the Calcamite tank will be removed and salvaged.

Detailed drawings are found in Appendix E.

It is requested to change the project description, from business and warehousing to school use and change the landowner from Monzali Property Management Company (Pty) Ltd to Edinvest Schools Operations (Pty) Ltd for Area B only). In addition, the provision of a temporary conservancy tank is required.

3.3 Listed activities triggered

A pre-application meeting was conducted with the Department of Economic Development, Tourism and Environmental Affairs (EDTEA) on 5 October 2020. It has been confirmed in this meeting that no new listed activities will be triggered as a result of the amendment process (Appendix A.3).

3.4 Water Use Authorisation Application

A Water Use Authorisation Application is being undertaken as a separate process and will be submitted to the DWS.

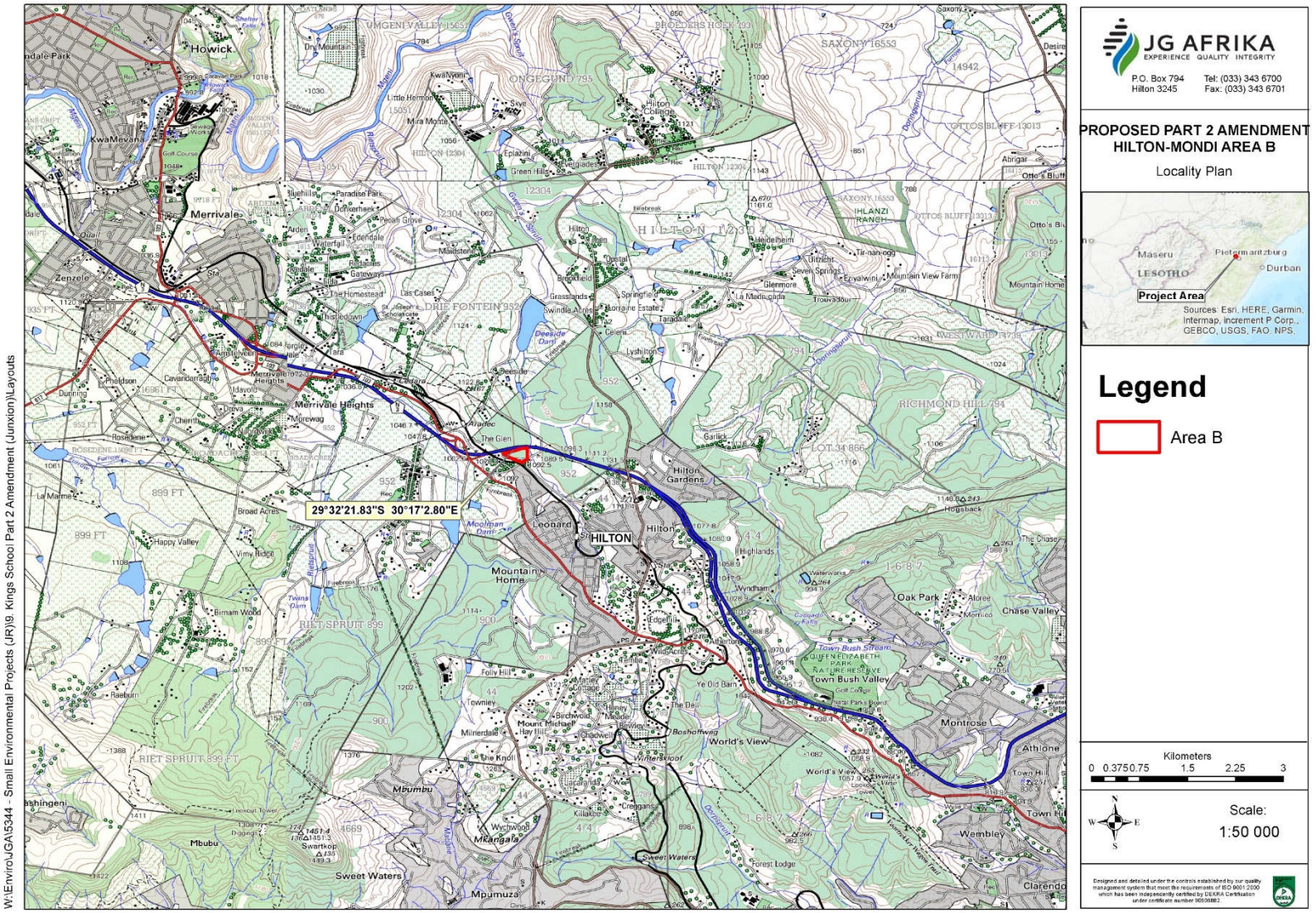


Figure 1: Map showing the location of the development site

Figure 2: Map showing the development site

4 ENVIRONMENTAL CONTEXT

4.1 Physical environment

The site has already been cleared and platformed in accordance with the approved EA. Further, all work conducted to date, has been overseen by an ECO.

4.2 Surface water features

A Wetland is present within the property and has been assessed as part of the original EA. A 30m buffer was approved for the area. The cleared platform on which development will take place is outside the 30m buffer. The impact of the temporary conservancy tank has been included within this assessment.

4.3 Additional Specialist Assessments

In addition to specialist assessments conducted as part of the Basic Assessment Process, a Traffic Impact Assessment (TIA) and a Wetland Risk Assessment Specific to the Conservancy Tank was conducted for the proposed amendment. The findings of this study have been included below.

Wetland Assessment:

The wetland was delineated and assessed (Teixeira-Leite, A. and Macfarlane, D.M., 2009), and a rehabilitation plan provided (ECO-Pulse, 2016), at the time of the original environmental impact assessment undertaken for the Hilton-Mondi Development.

The amendment requires the installation of conservancy tanks on site until the uMngeni Waste Water Treatment works can accommodate the development. In this regard, as this is a change in what was previously assessed, the risk to the Wetland has been re-examined.

A Wetland Risk Assessment was conducted by JG Afrika (Pty) Ltd to consider the potential impacts and risks of installation and operation of a temporary conservancy tank area. The results were as follows:

- The location is approximately 90m to the west of the nearest boundary of the delineated wetland area;
- Upon completion of Etham College, the area between the conservancy tank and the wetland will be developed.

The Wetland Risk Assessment concluded the following:

- The risk associated with contamination of the wetland as a result of seepage or spillage from the conservancy tank are Low.

The Wetland Risk Assessment recommended the following mitigation measures:

Construction Phase:

- Construction of the conservancy tank must be done with appropriate care and under supervision of the Project Engineer and an Environmental Control Officer. If the block-and-plaster method is used, then special care must be taken to ensure that the wall is firmly supported by the soil behind it so as to prevent cracking when the tank is full.
- It is recommended that a low bund wall should be raised around the tank and should enclose a space with a volume of no less than 25% of the estimated daily flow input. The reasons for the wall are to contain accidental spillage and to provide some further margin of protection. This wall need be no

more than 0.6m high and may be an earth wall covered by grass. The included space must be lined with an impervious sheeting which should be buried to protect it from sunlight and from accidental puncturing. If the contained space is ever contaminated, the soil within it must be collected and be removed for disposal at an appropriate municipal disposal site.

Operational Phase:

- During the temporary operational phase, the tank must be regularly inspected for any signs of leakage or other faults and the signal switches and telemetry must be routinely tested.
- On a bimonthly basis the water in the wetland both upstream and downstream of the college site must be tested for contamination. Suggested sampling sites are shown in the figure below. The sampling must be done with sterile bottles from an accredited laboratory which will also do the analyses.

- The samples should be analysed for nutrients and total and coliform bacterial cell counts. The results should ideally show no increases in contamination from the college area.

In conclusion, it is the opinion of the specialist that the conservancy tank area, if properly constructed and operated, poses a very low to no level of risk to the wetland. It is therefore not considered to be a fatal flaw for the development of the school and is no reason to delay the project.

A copy of the Wetland Risk Assessment is provided in Appendix F.

Traffic Impact Assessment:

As per the Pre-application Meeting Minutes, a Traffic Impact Assessment (TIA) is required as the development of a school is anticipated to produce more traffic than business use.

The TIA took cognisance of the fact that numerous developments are proposed within the area as well as projected traffic flows over the next 5 years and the proposed known upgrades to the road network by the KwaZulu-Natal Department of Transport.

The 5 Year background traffic with adjacent developments was analysed. This scenario consists of the following:

1 The existing background traffic factored up to the 5-year horizon (3% per annum compound);

2 Realigned Rotunda Road Intersection;
3 Khanya Village low income subsidized housing development;
4 The proposed mixed-use development on Erf 1441 Hilton; and
5 10% of the Hilton Mondi C1 site.

The results concluded that at full operational capacity, in the future, traffic signals will need to be installed at the intersection of Cedara road and the realigned Rotanda Road.

The following is recommended in order to manage additional traffic anticipated:

- A 4 way stop be implemented at the entrance of the school on Rotanda Road as depicted in the figure below.

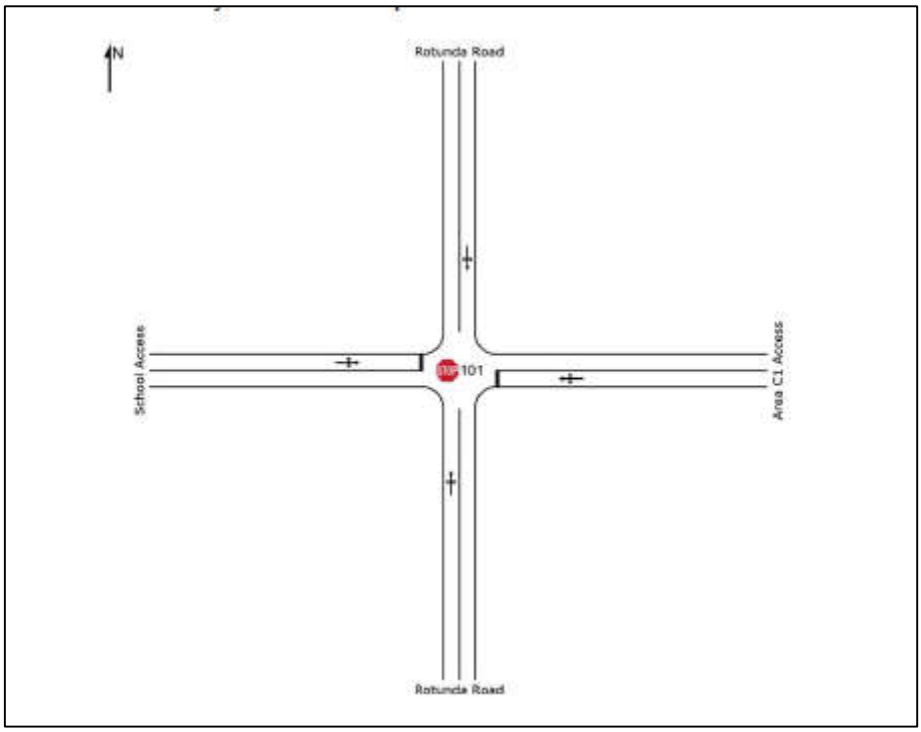


Figure 3: Proposed road upgrades

A copy of the Traffic Impact Assessment is included as Appendix G.

5. IMPACT ASSESSMENT, MANAGEMENT AND MITIGATION OF THE PROPOSED CHANGE

This section of the report identifies, highlights and evaluates the negative impacts that are associated with the change in landuse and temporary use of conservancy tanks.

This site relates to an area already approved in the original EA. The only change is the land use proposed on a portion of the site and as such, no site alternative has been examined. This area is the only area currently available to Edinvest Schools Operations (Pty) Ltd.

Please note that 2 conservancy tank design options have been considered and 3 locations of the conservancy tank have been considered in the planning phase of the project. The alternate locations of the conservancy tank were deemed to be unsuitable by the Wetland Specialist and have therefore been excluded from being

assessed further in this report. In terms of the type of conservancy tank, a reinforced concrete conservancy tank was deemed unsuitable by the Engineers and have therefore been excluded from this report.

Only additional impacts have been assessed within this report.

5.1 Impact Assessment Methodology

Impacts identified were assessed according to the criteria outlined below. Each impact was ranked according to extent, duration, magnitude and probability. These criteria are based on the Department of Environmental Affairs and Tourism (DEAT) (now the Department of Environmental Affairs) Guideline Document to the EIA Regulations (1998). A significance rating was calculated as per the methodology outlined below. Where possible, mitigatory measures were recommended for the impacts identified.
The 2014 EIA Regulations (as amended), prescribe requirements to be adhered to and objectives to be reached when undertaking Impact Assessments. These are noted in the following sections contained within the 2014 EIA Regulations (as amended):

- Regulation 326, Appendix 2 and Appendix 3 – Environmental Impact Assessment Requirements.

In terms of these Regulations, the following should be considered when undertaking an Impact Assessment:

- *A description and assessment of the significance of any environmental impact including:*
- Cumulative impacts that may occur as a result of the undertaking of the activity during the project life cycle;
- Nature of the impact;
- Extent and duration of the impact;
- The probability of the impact occurring;
- The degree to which the impact can be reversed;
- The degree to which the impact may cause irreplaceable loss of resources; and
- The degree to which the impact can be mitigated.

The overall significance of an impact / effect has been ascertained by attributing numerical ratings to each identified impact. The numerical scores obtained for each identified impact have been multiplied by the probability of the impact occurring before and after mitigation. High values suggest that a predicted impact / effect is more significant, whilst low values suggest that a predicted impact / effect is less significant.
The interpretation of the overall significance of impacts is presented in Table 3.

Table 3: Interpretation of the significance scoring of a negative impact / effect

SCORING VALUE	SIGNIFICANCE
>35	**High - The impact is total / consuming / eliminating** - In the case of adverse impacts, there is no possible mitigation that could offset the impact, or mitigation is difficult, expensive, time-consuming or some combination of these. Social, cultural and economic activities of communities are disrupted to such an extent that these come to a halt. Mitigation may not be possible / practical. Consider a potential fatal flaw in the project.
25 - 35	**High - The impact is profound** - In the case of adverse impacts, there are few opportunities for mitigation that could offset the impact, or mitigation has a limited effect on the impact. Social, cultural and economic activities of communities are disrupted to such an extent that their

SCORING VALUE	SIGNIFICANCE
	operation is severely impeded. Mitigation may not be possible / practical. Consider a potential fatal flaw in the project.
20 – 25	Medium - **The impact is considerable / substantial** - The impact is of great importance. Failure to mitigate with the objective of reducing the impact to acceptable levels could render the entire project option or entire project proposal unacceptable. Mitigation is therefore essential.
7 – 20	Medium - **The impact is material / important to investigate** - The impact is of importance and is therefore considered to have a substantial impact. Mitigation is required to reduce the negative impacts and such impacts need to be evaluated carefully.
4 – 7	Low - **The impact is marginal / slight / minor** - The impact is of little importance, but may require limited mitigation; or it may be rendered acceptable in light of proposed mitigation.
0 – 4	Low - **The impact is unimportant / inconsequential / indiscernible** – no mitigation required, or it may be rendered acceptable in light of proposed mitigation.

The significance rating of each identified impact / effect was further reviewed by the Environmental Assessment Practitioner (EAP) by applying professional judgement.

For the purpose of this assessment, the impact significance for each identified impact was evaluated according to the following key criteria outlined in the sub-sections below.

NATURE OF IMPACT

The environmental impacts of a project are those resultant changes in environmental parameters, in space and time, compared with what would have happened had the project not been undertaken. It is an appraisal of the type of effect the activity would have on the affected environmental parameter. Its description includes what is being affected, and how.

SPATIAL EXTENT

This addresses the physical and spatial scale of the impact. A series of standard terms and ratings used in this assessment relating to the spatial extent of an impact / effect are outlined in Table 44.

Table 4: Rating scale for the assessment of the spatial extent of a predicted effect / impact

RATING	SPATIAL DESCRIPTOR
7	**International** - The impacted area extends beyond national boundaries.
6	**National** - The impacted area extends beyond provincial boundaries.
5	**Ecosystem** - The impact could significantly affect functioning ecosystems linked to the site.
4	**Regional** - The impact could affect the greater area including the neighbouring areas, transport routes and surrounding towns etc.
3	**Landscape** - The impact could affect all areas generally visible, including ecosystems linked to the site.
2	**Local** - The impacted area extends slightly further than the actual physical disturbance footprint and could affect the whole, or a measurable portion of adjacent areas.
1	**Site Related** - The impacted area extends only as far as the activity e.g. the footprint. The loss is inconsequential in terms of the spatial context of the relevant environmental or social aspect.

SEVERITY / INTENSITY / MAGNITUDE

This provides a qualitative assessment of the severity of a predicted impact / effect. A series of standard terms and ratings used in this assessment which relate to the magnitude of an impact / effect are outlined in Table 5.

Table 5: Rating scale for the assessment of the severity / magnitude of a predicted effect / impact

RATING	MAGNITUDE DESCRIPTOR
7	**Total / consuming / eliminating** - Function or process of the affected environment is altered to the extent that it is permanently changed.
6	**Profound / considerable / substantial** - Function or process of the affected environment is altered to the extent where it is permanently modified to a sub-optimal state.
5	**Material / important** - The affected environment is altered, but function and process continue, albeit in a modified way.
4	**Discernible / noticeable** - Function or process of the affected environment is altered to the extent where it is temporarily altered, be it in a positive or negative manner.
3	**Marginal / slight / minor** - The affected environment is altered, but natural function and process continue.
2	**Unimportant / inconsequential / indiscernible** - The impact temporarily alters the affected environment in such a way that the natural processes or functions are negligibly affected.
1	**No effect / not applicable**

DURATION

This describes the predicted lifetime / temporal scale of the predicted impact. A series of standard terms and ratings used in this assessment are included in Table 6.

Table 6: Rating scale for the assessment of the temporal scale of a predicted effect / impact

RATING	TEMPORAL DESCRIPTOR
7	**Long term** – Permanent or more than 15 years post decommissioning. The impact remains beyond decommissioning and cannot be negated.
3	**Medium term** – Lifespan of the project. Reversible between 5 to 15 years post decommissioning.
1	**Short term** – Quickly reversible. Less than the project lifespan. The impact will either disappear with mitigation or will be mitigated through natural process in a span shorter than any of the project phases or within 0 -5 years.

IRREPLACEABLE LOSS OF RESOURCES

Environmental resources cannot always be replaced; once destroyed, some may be lost forever. It may be possible to replace, compensate for or reconstruct a lost resource in some cases, but substitutions are rarely ideal. The loss of a resource may become more serious later, and the assessment must take this into account. A series of standard terms and ratings used in this assessment are included in Table 7.

Table 7: Rating scale for the assessment of loss of resources due to a predicted effect / impact

RATING	RESOURCE LOSS DESCRIPTOR
7	**Permanent** – The loss of a non-renewable / threatened resource that cannot be renewed / recovered with, or through, natural process in a time span of over 15 years, or by artificial means.
5	**Long term** – The loss of a non-renewable / threatened resource that cannot be renewed / recovered with, or through, natural process in a time span of over 15 years, but can be mitigated by other means.
4	**Loss of an 'at risk' resource** - one that is not deemed critical for biodiversity targets, planning goals, community welfare, agricultural production, or other criteria, but cumulative effects may render such loss as significant.
3	**Medium term** – The resource can be recovered within the lifespan of the project. The resource can be renewed / recovered with mitigation or will be mitigated through natural process in a span between 5 and 15 years.
2	**Loss of an 'expendable' resource** - one that is not deemed critical for biodiversity targets, planning goals, community welfare, agricultural production, or other criteria.
1	**Short-term** – Quickly recoverable. Less than the project lifespan. The resource can be renewed / recovered with mitigation or will be mitigated through natural process in a span shorter than any of the project phases, or in a time span of 0 to 5 years.

REVERSIBILITY / POTENTIAL FOR REHABILITATION

The distinction between reversible and irreversible impacts is a very important one and the irreversible impacts not susceptible to mitigation can constitute significant impacts in an EIA (Glasson et al, 1999). The potential for rehabilitation is the major determinant factor when considering the temporal scale of most predicted impacts. A series of standard terms and ratings used in this assessment are included in Table 8.

Table 8: Rating scale for the assessment of reversibility of a predicted effect / impact

RATING	REVERSIBILITY DESCRIPTOR
7	**Long term** – The impact / effect will never be returned to its benchmark state.
3	**Medium term** – The impact / effect will be returned to its benchmark state through mitigation or natural processes in a span shorter than the lifetime of the project, or in a time span between 5 and 15 years.
1	**Short term** – The impact / effect will be returned to its benchmark state through mitigation or natural processes in a span shorter than any of the phases of the project, or in a time span of 0 to 5 years.

PROBABILITY

The assessment of the probability / likelihood of an impact / effect has been undertaken in accordance with ratings and descriptors provided in Table 9.

Table 9: Rating scale for the assessment of the probability of a predicted effect / impact

RATING	PROBABILITY DESCRIPTOR
1.0	Absolute certainty / will occur
0.9	Near certainty / very high probability
0.7 – 0.8	High probability / to be expected
0.4 - 0.6	Medium probability / strongly anticipated
0.3	Low probability / anticipated
0.2	Possibility

0.0 - 0.1	Remote possibility / unlikely

5.2 Mitigation

In terms of the assessment process the potential to mitigate the negative impacts is determined and rated for each identified impact and mitigation objectives that would result in a measurable reduction or enhancement of the impact are taken into account. The significance of environmental impacts has therefore been assessed taking into account any proposed mitigation measures. The significance of the impact "without mitigation" is therefore the prime determinant of the nature and degree of mitigation required.

5.3 Impacts Identified

No other reasonable and / or practical site alternative exists that would meet the need and desirability of this Application. The no-go alternative would be to not develop within this area. The land will be developed into a mixed use development i.e. businesses and warehousing as per the original EA. The impacts identified for the proposed construction of the development and the associated mitigation measures are provided in Table 10.

Table 10:Impacts identified and associated mitigation measures

Impact	Description	Mitigation
Soil	As the platform has already been established on site, no major impacts on soil is anticipated. Furthermore, the impact of buildings in the area has already been identified in the previous Assessment. Soil impacts and associated mitigation measures have been included in the previous Environmental Authorisation Process. Potential impact soil as a result of the conservancy tank have been included only.	Monitoring of leaks as per the requirements of the Wetland specialist. ***Construction Phase:*** • Construction of the conservancy tank must be done with appropriate care and under supervision of the Project Engineer and an Environmental Control Officer. If the block-and-plaster method is used, then special care must be taken to ensure that the wall is firmly supported by the soil behind it so as to prevent cracking when the tank is full. • It is recommended that a low bund wall should be raised around the tank and should enclose a space with a volume of no less than 25% of the estimated daily flow input. The reasons for the wall are to contain accidental spillage and to provide some further margin of protection. This wall need be no more than 0.6m high and may be an earth wall covered by grass. The included space must be lined with an impervious sheeting which should be buried to protect it from sunlight and from accidental puncturing. If the contained space is ever contaminated, the soil within it must be collected and be removed for disposal at an appropriate municipal disposal site. ***Operational Phase:*** • During the temporary operational phase, the tank must be regularly inspected for any signs of leakage or other faults and the signal switches and telemetry must be routinely tested.
Vegetation and fauna	No new impact is anticipated for the proposed school project other than what has previously been assessed for the area as part of the	None. Existing Environmental Management Programme examines this requirement.

Impact	Description	Mitigation
Noise pollution Waste	previous Environmental Authorisation. These impacts and the associated mitigation measures remain unchanged. In addition, it should be noted that the area has already been cleared of vegetation and the platform established.	
Socio-Economic	• Creation of job opportunities for skilled personnel (e.g. engineers, specialists etc.) and non-skilled personnel (e.g. labourers); • Skills development of the local community through employment opportunities; • Social anxiety may arise should the surrounding community not be adequately notified of the proposed activity; and • Possible economic benefits to suppliers of building materials in the local area as goods and services may be purchased from these entities during the construction phase.	• Inform the surrounding communities and general public of the proposed activity as soon as possible. This will serve to ease potential social anxiety. Such notification can be conducted through the Public Participation Process; • Local people should be employed where possible.
Safety and security	No new impact is anticipated for the proposed school project other than what has previously been assessed for the area as part of the previous Environmental Authorisation. These impacts and the associated mitigation measures remain unchanged.	None. Existing Environmental Management Programme examines this requirement.
Water Resources	• Contamination of ground and surface water and soil; • Drainage lines may be polluted due to accidental spillages from the conservancy tank.	•All recommendations of the Engineering Letter and Wetland Risk assessment must be adhered to as per Appendix F and H. ***Construction Phase:*** • Construction of the conservancy tank must be done with appropriate care and under supervision of the Project Engineer and an Environmental Control Officer. If the block-and-plaster method is used, then special care must be taken to ensure that the

Impact	Description	Mitigation
		wall is firmly supported by the soil behind it so as to prevent cracking when the tank is full. • It is recommended that a low bund wall should be raised around the tank and should enclose a space with a volume of no less than 25% of the estimated daily flow input. The reasons for the wall are to contain accidental spillage and to provide some further margin of protection. This wall need be no more than 0.6m high and may be an earth wall covered by grass. The included space must be lined with an impervious sheeting which should be buried to protect it from sunlight and from accidental puncturing. If the contained space is ever contaminated, the soil within it must be collected and be removed for disposal at an appropriate municipal disposal site. ***Operational Phase:*** • During the temporary operational phase, the tank must be regularly inspected for any signs of leakage or other faults and the signal switches and telemetry must be routinely tested. • On a bimonthly basis the water in the wetland both upstream and downstream of the college site must be tested for contamination. Suggested sampling sites are shown in the figure below. The sampling must be done with sterile bottles from an accredited laboratory which will also do the analyses. • The samples should be analysed for nutrients and total and coliform bacterial cell counts. The results should ideally show no increases in contamination from the school area. Although the 2 x 9500litre tanks have approximately 4 days storage capacity, it is suggested that as part of mitigation measures for an overflow, earth berms not exceeding 1m in height be constructed around the tanks. This

Impact	Description	Mitigation
		berm will prevent overflows into the nearby wetland area. It should however be noted that the risk of overflow is low, as effluent levels will be controlled and managed by two float switches, linked to the service provider and the maintenance manager at the school. As earth berms have been identified as a required mitigation measure by the Engineer and the Wetland Specialist, and 2 different heights have been proposed, it is the opinion of the Environmental Assessment Practitioner that a minimum height of 0.6m and a maximum height of 1m must be implemented.
Traffic	• Increased Traffic Volumes as a result of change in landuse.	• A Four way intersection to be formalised; • Traffic control lights required by KZN DoT when operating at full capacity.

Table 11: Assessment of Impacts associated with the change in landuse and temporary use of conservancy tanks and increased traffic

Nature of Impact	Spatial extent		Severity/ intensity/ magnitude		Duration		Resource loss	Reversibility		Probability		Significance without mitigation	Significance with mitigation
	Without	With	Without	With	Without	With		Without	With	Without	With		
Traffic	2	1	4	1	3	1	2	3	1	0.6	0.1	8.4	0.6
Water Resources (Conservancy Risk)	2	1	4	1	1	1	1	1	1	0.2	0.1	1.8	0.5
Overall Significance												5.1	0.6
												LOW	**LOW**

6 ADVANTAGES AND DISADVANTAGES ASSOCIATED WITH THE PROPOSED CHANGE

Please note that details on the needs and desirability of the project has been provided by Edinvest Schools Operations (Pty) Ltd:

6.1 Overview

Edinvest is building Etham College in Hilton on a site known as Hilton Junxion, near the Rotunda. Edinvest has entered into an agreement with Monzali Property Management Company (Pty) Ltd to acquire Portion 368 (of 212) of the Farm Drie Fonteinen No. 952, in extent 4,6787 hectares, where Etham College will be built. Edinvest believes that the school is both needed and desirable as it will have the following benefits:

- Help address backlog in school facilities and learner opportunities by creating a new school for 1 050 learners. The entrepreneurial mindset that forms part of the Edinvest education model can be replicated beyond a specific school, thereby having a broader impact across society.
- Create about 80 permanent sustainable jobs and 100s of construction related jobs during the construction period.
- Contribute to growing the KZN economy and reducing inequality in a critical sector of the economy, i.e. education.
- Contribute to the growth of black owned business.

Edinvest is a group of black owned businesses with two key shareholders – Mr Nhlanhla Khambule and Mr Thanda Ndaba. Edinvest operates Canaan College (www.canaancollege.co.za) and the Edinvest brand enjoy support from the black middle and working class in Durban and the greater KZN. It is due to their support and demand for a boarding school in KZN that the Etham College project was initially pursued.

Edinvest's education model is underpinned by the belief that its schools are developing future leaders, who will be Inspired to Innovate and Act in the local and global market. Etham College will be a co-educational combined school, with both day scholars and boarders, offering the CAPS curriculum with the NSC being the final Grade 12 qualification. Edinvest emphasises personalised learning, entrepreneurship, emotional intelligence, and digital technologies.

At the core, Edinvest Schools are characterised by building and sustaining high quality, authentic inter-personal relationships. Edinvest's unique selling point is the focus on developing entrepreneurial thinking and skills development to empower youth. This helps to uplift their own communities, contribute to job creation and eventually the strengthening of the national economy. This is achieved through personalised learning, where the emphasis is on self-discovery and content creation, allowing for the learner to find new information and knowledge, with time and prescribed content providing the backdrop.

6.2 Site Information

The school site has excellent visibility and access. The zoned and serviced land is adjacent to the N3 highway and easily accessible from the R103. The intention is that the school be ready for occupation in the second half of 2021. Until this time Etham College will operate in the existing King's School located in Nottingham Road.

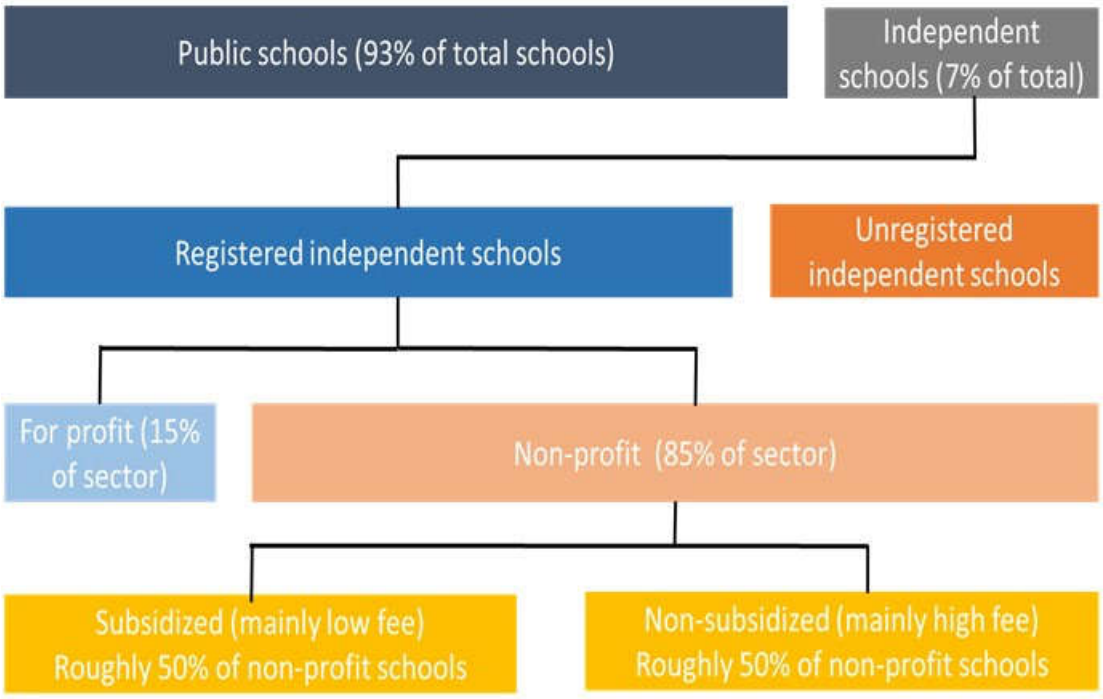
The school site is centrally located in the rapidly developing hub of the KZN Midlands. Hilton is an area with an excellent reputation for education and is much sought after by parents and learners throughout South

Africa and abroad. The school will benefit from modern green design which will be able to incorporate the latest technological developments in teaching and learning. The school will focus on providing the learners with the skills that are required for the Fourth Industrial Revolution and will therefore incorporate an innovation centre and facilities to promote entrepreneurship.

Figure 4: Architects overview of the school

6.3 Market Information

The nature of the South Africa schools' market is shown in the diagram below:



Independent schools in SA comprise only 7% of the market while the global trend is 20%. The non-profit school market is comprised of many faith-based schools and single well-established schools. Independent schools fee levels vary from low, to affordable, middle income & premium. The large school operators with a national footprint mainly operate in the middle income and premium markets and include Curro (59 967 learners), ADvTECH (25 961 learners) and Reddam. Most of medium sized and emerging school groups are active in Gauteng, such as Spark Schools, Future Nations and Nova Pioneer. Edinvest is a KZN-based emerging school operator with a strong growth plan.

Although there are many schools in the KZN Midlands, very few cater for the market for which the Etham College will provide. Most independent schools in the region either have school fees which are much greater than the new proposed school, or they are single sex schools, or they are either exclusively primary or secondary schools. The new Etham College will be relatively affordable (school fees approximately R3 500 per month), co-ed, and cater for both primary and high school learners.

The uMngeni Local Municipality, into which the Hilton area falls, is one of the fastest growing areas in terms of population growth in KZN (growing 25,5% between 2001 and 2011). In the 20km feeder area of Hilton Junxion, 27% of the households are ranked LSM 7 or higher. This is 71% higher than the KZN average. Children under the age of 20 make up 30% of the population of the area.
The latest available demographic information (2019) indicates that 812 268 people live in a 20km radius of the school site, with an average household population of 3,6 (this is equal to the South African average).

Households and Population uMngeni	**Numbers**	**Municipal growth between 2001 and 2011**	**Average KZN growth between 2001 and 2011**	**SA growth between 2001 and 2011**
Households 2011	30 490	34%	14%	23%
Population 2011	92 710	25.5%	7%	15.5%

Comparative demographic data
8,2% of the households in the feeder area are in the LSM 10 bracket, which is more than double the KZN average of 3,9%. This would equate to approximately 18 000 children who would be readily able to afford the proposed school fees.

The Midlands region of Kwa-Zulu Natal has some of the most expensive schools in South Africa. Perhaps the most famous of these are Hilton and Michaelhouse, with fees well in excess of R24 000 per month. The average school fee for a learner attending the new Etham College will be R3 500 per month. There are over 18 000 children of school going age in the LSM 10+ bracket within a 20km radius of the Etham College. If one factors into this number that the new Etham College will also offer boarding facilities, and will market its offering throughout South Africa, it is clear that the school is extremely well positioned to attract a significant portion of both the local market as well as boarders from further afield. This is further strengthened by the fact that the average boarding fees of approximately R4 200 per month are very competitive.

As the area is well known for its educational offerings, there are many private schools in the area. However, the majority of these are single sex schools and many offers only primary or high schools.

The closest two independent schools to the proposed new site, are Grace College and Cowan House. Grace College is a standalone high school and it has an average monthly fee of R7 600 per month. Cowan House is a primary school only with an average monthly fee of R8 200 per month. Howick High School is a competitor state school with good facilities. It has average monthly fees of R3 000 per month. However, the large classes and increasing pressure to accept even more learners is placing a great strain on its resources and academic offering in general. It is also filled to capacity.

The proposed new Etham College in Hilton is very well positioned to serve a segment of the market which is severely under-catered for in the region. This, coupled with the fact that the site has excellent visibility and exposure, will ensure its presence becomes well known very rapidly. The school will also be able to benefit from the excellent educational reputation of the region and will therefore be able to attract learners from well beyond its immediate feeder area.

Please note the following which will be incorporated into the development as part of the Green design and principle:

Buildings:

- ·All classroom buildings have been orientated to face north and are 7,5m wide. Where classrooms are located at the end of a row, and are longer, the window openings to the east and west will have sun control measures in place to assist in getting light into the deeper spaces.
- 1.5m wide walkways have been provided on all north faces to protect the windows on the northern side during summer but allow for sun penetration in the winter.
- The construction technique employed will be masonry brick cavity walls with little to no openings on the east and west sides, and smaller openings on the south. Whilst insulation within the cavity has not been confirmed, it is a recommendation.
- Insulation to roofs of all habitable rooms.
- Natural cross ventilation will be created by having windows with both low and high level windows on opposite sides of the rooms, including but not limited to clerestory windows.
- All buildings will be fitted with energy saving light bulbs.

Site and Landscaping:

- Rainwater will be harvested from all pitched roofs in the central campus area and stored in tanks to assist with the flushing of toilets and watering of the grounds.
- Stormwater run off from walkway canopies will be channelled into the surrounding planting beds and overflow will be attenuated towards the wetland area. This will be specifically designed by the engineer and Landscape Architect.
- Only indigenous plants will be used during landscaping.
- SUDS principles will be employed in the design of roadways and walkways on the property.
- Secure bicycle parking facilities will be provided close to the change rooms, which are near the entrance to the school.
- Waste management and recycling facilities will be provided for.

Etham College will be a transformed version of the existing Kings School in Hilton which has been approved by WESSA. The intention is that environmental sustainability and ecological education will be inculcated in the transformed school's ethos, especially with a protected wetland as part of the site.

Table 5 below provides a summary on the advantages and disadvantages of the proposed change.

Table 12: Advantages and disadvantages of the proposed change

ADVANTAGES	DISADVANTAGES
Job creation	The Developer may choose not to proceed with the project, resulting in the loss of the various potential socio-economic benefits, as described in the Section above.
Improved livelihood of the local community	Increased traffic within the area
An increase to the Municipal Rates and Tax Base	Loss of a number of job opportunities
More affordable schooling within the area	

7 CHANGES TO THE EMPR

The current Environmental Management Programme (EMPr, dated April 2010) and which has been approved by EDTEA in the EA, must be updated to include the proposed mitigation and management measures of additional impacts associated with the proposed change.

Table 13 below provides additional mitigation and management measures to be included in the Part 2 Amendment approval. The remainder of the EMPr, as approved, remain unchanged. A copy of the approved EMPr, together with the changes required has been included in Appendix H.

Table 13: Additional mitigation and management measures associated with the proposed change

	IMPACT	MITIGATION MEASURES
	OPERATIONAL PHASE	
1.	Solid and Water Pollution (Conservancy Tank)	All recommendations of the Engineering Letter and Wetland Risk assessment must be adhered to as per Appendix F and H. As per the Wetland Risk Assessment: • During the temporary operational phase, the tank must be regularly inspected for any signs of leakage or other faults and the signal switches and telemetry must be routinely tested. • On a bimonthly basis the water in the wetland both upstream and downstream of the college site must be tested for contamination. Suggested sampling sites are shown in the figure below. The sampling must be done with sterile bottles from an accredited laboratory which will also do the analyses. • The samples should be analysed for nutrients and total and coliform bacterial cell counts. The results should ideally show no increases in contamination from the school area. As per the Engineering Letter: • Although the 2 x 9500litre tanks have approximately 4 days storage capacity, it is suggested that as part of mitigation measures for an overflow, earth berms not exceeding 1m in height be constructed around the tanks. This berm will prevent overflows into the nearby wetland area. It should however be noted

		that the risk of overflow is low, as effluent levels will be controlled and managed by two float switches, linked to the service provider and the maintenance manager at the school.
2.	Traffic Impacts	• A Four way intersection to be formalised; • Traffic control lights required by KZN DoT when operating at full capacity.

8 PUBLIC PARTICIPATION PROCESS (PPP)

8.1 Objectives of the Public Participation Process (PPP)

In accordance with Regulation 40 (1), as set out in Chapter 6 of the NEMA EIA Regulations (2014 as amended), the purpose of public participation is to provide all potential or registered I&APs, including the competent authority, with the opportunity to access the relevant documents and information which could reasonably or potentially influence any decision with regards to the application for amendment of Area B of DC22/0061/08. The process aims to –

- Disclose the proposed changes;
- Identify issues and concerns raised by the I&APs;
- Respond to all of the I&APs concerns and enquiries;
- Identify additional or new stakeholders and people affected by, or interested in, the application for amendment;
- Ensure that all issues raised by I&APs have been adequately addressed and/or assessed; and
- Share the findings of the Amendment Report, such as significant impacts, mitigation measures, management actions, and monitoring programmes with registered I&APs.

The PPP must include consultation with the following key stakeholders and parties –

- The competent authority: uMgungundlovu EDTEA;
- All state departments which have laws relating to the proposed activity or the proposed location of the activity;
- All organs of state which have jurisdiction relating to the proposed activity or the proposed location of the activity; and
- The registered and potential I&APs from the original EA process.

8.2 Legislative requirements

In accordance with Regulation 41 (2) of Chapter 6, the person conducting the PPP must provide notice using the following methods –

a) Placing notice boards at visible locations, which are accessible to the public, on the boundary of the affected property and within proximity to the affected property. The notice board(s) must –
   (a) Be at least 60 cm x 42 cm in size;

(b) Indicate the nature and location of the amendment to which the application relates;
(c) Explain where further information can be obtained;
(d) Stipulate the manner in which and the person to whom correspondence relating to the application or proposed application may be made;

b) Providing written notice to –
(i) The owner and/or occupiers of the proposed site as well as the owner(s) and/or occupiers of the alternative sites;
(ii) The owners and/or occupiers of the land adjacent to the site as well as the owners and/or occupiers of the land adjacent to the alternative sites;
(iii) The municipal ward councillor of the affected property and the alternative sites (if different to the preferred alternative) as well as any organisation of ratepayers that represent the community in the affected area;
(iv) The municipality which has jurisdiction in the area;
(v) All organs of state which have jurisdiction relating to the proposed activity or the proposed location of the activity; and
(vi) Any other parties as required by the competent authority;

c) Placing an advertisement in one local newspaper or any official *Gazette* that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;

d) If necessary, placing an advertisement in one provincial newspaper or national newspaper if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken; and

e) Using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is interested but not able to participate in the process due to illiteracy, disability or any other disadvantage.

8.3 Proof of Public Participation conducted

In accordance with Regulation 32 (1) (a) (aa) as set out in Chapter 5 of the NEMA EIA Regulations (2014 as amended), JG Afrika (Pty) Ltd (the EAP) submitted a PPP outline to the DEDEAT, who approved the manner in which the EAP will conduct PPP on 18 July 2019.

The proof of all of the PPP has been included in the Final Amendment Report. Table 7 indicates the location of the proof of the initial PPP as well as the public review period PPP.

Table 14: PPP proof

PPP DOCUMENTS	PROOF
Background Information Document (Bid)	Not required as per EDTEA Pre-Application Meeting. Letter drops of the proposed process was provided to neighboring landowners.
Advertisement	Appendix I.1
Letters of Notification (LoN)	Appendix I.2.
Onsite notice board	Appendix I.3

I&AP Database	Appendix I.4.
Comments and Response Report	No comments have been received to date. All comments will be included in the final Addendum Report.
Proof of correspondence and emails	Correspondence detailing notification of availability of the Amendment Report will be included within the final Amendment Report.

Advertisement:

A newspaper advertisement was published to inform the general public of the Amendment Process. An advertisement was published on 10 November 2020 in the Witness newspaper. The advertisement was published in English as this is the dominant language in the area. Proof of publication is provided in Figure 5.

NOTICE OF PROPOSED PART 2 AMENDMENT OF AUTHORISATION REF DC22/0061/08 & DC22/AMEND/0061/2018 (AREA B OF THE HILTON MONDI DEVELOPMENT, UMNGENI LOCAL MUNICIPALITY)

Notice is hereby given in terms of the National Environmental Management Act, (Act No. 107 of 1998): Environmental Impact Assessment Regulations (2014, as amended), published in terms of Government Notice No. R325 (2014, as amended), of the intent to conduct a Part 2 Amendment.

Applicant: Monzali Property Management Company

Proposed Amendment: There are three components to the Amendment to the Environmental Authorisation, these being as follows:

- Amendment to the name of the Authorisation Holder from Monzali Property Management Company (Pty) Ltd to Edenvest Schools Operations (Pty) Ltd for Area B only.
- Amendment of the Environmental Authorisation to change the land use of Area B only, currently Business Park and Office Use to a School use.
- Amendment of the Environmental Authorisation to permit the temporary use of a conservancy tank for effluent management on the site until such time as the uMngeni Water Hilton Wastewater Treatment Works is constructed and operational.

Location: The proposed development will occur within Ward 6 of uMgeni Local Municipality, KwaZulu-Natal. Co-ordinates of the site are as follows: 29°32'20.13"S 30°16'58.81"E.

The draft Amendment Report will be available for comment on the JG Afrika (Pty) Ltd website (www.jgafrika.com) from 11 November 2020 to 10 December 2020.

Should you wish to register as an Interested and Affected Party (IAP) in this Application, please submit your name, contact information and interest in the matter, as well as any comment or queries you may have to:

JG Afrika (Pty) Ltd.
Contact Person: Ms Rione Patalc
e-mail: patalc@jgafrika.com;
JG Afrika (Pty) Ltd, PO Box 794, Hilton, 3245;
Tel: 033 343 6700,
Fax: 033 343 6789.

Figure 5: Published notice in the Witness on 10 November 2020

Letter Drops:

The circulation of a Notification Letter was not required (as per the minutes of the Pre-application Meeting). The EAP however, did provide letter drops to immediately surrounding properties. A copy of the Notification Letter is included as Appendix I.2 of this report. No comments have been received to-date from any IAP or

Key Stakeholder following the circulation of the Notification Letter, advertisement or placement of site notices.

Plate 1: Letter Drops on site

On-Site Notice Boards:

Five (5) site notice boards in total were placed on site on the 6 November 2020. The notice boards were written in English and isiZulu. Figure 6 provides an illustration of the location of the notice boards on site.

The purpose of the notice boards was to inform neighbours, community members and passers-by of the proposed Amendment Application. The details of the EAP (Ms Patak) were also provided should any member of the public require additional information or wish to register as an IAP during the Amendment Application process. Plate 2 provide proof of the notice boards placed on site together with their localities.

Figure 6: Placement of posters on site

Plate 2: Poster placement on site

IAP Database:

As per the requirements of the Pre-application Meeting, the IAP register which was utilised for the original Environmental Authorisation Process must be utilized for the Amendment Application process. In this regard, the IAP register which was previous utilised was updated for this Amendment Application process in the following manner:

- Known changes in contact personnel in Government Departments, the Local Municipality, the District Municipality, relevant conservation bodies and non-governmental organisations (NGO's) were updated;
- All IAPs who had contact numbers and no email address were contacted to provide an email address for notifications. IAPs for which no email addresses could be sourced will be notified via registered mail.

This register is regularly updated to include those IAPs responding to the newspaper advertisement, site notice boards and Notification Letters. A copy of the IAP Register is included as Appendix I.4 of this report.

Copies of the Amendment Report has been circulated to the stakeholders and IAPs. A copy of the report was made available to download from the JG Afrika (Pty) Ltd website (www.jgafrika.com). The Application for Amendment to the EA was submitted to EDTEA on 09 November 2020 and a reference number of DC22/0061/2008/AMEND/2018/2020 was issued.

In terms of the EIA Regulations (2014), GN R326 43(2), State Departments that administer a law relating to a matter affecting the environment, specific to the Application, must submit comments within 30 days to the Environmental Assessment Practitioner (i.e. JG Afrika (Pty) Ltd). Should no comment be received within the 30 day commenting period ending 10 December 2020, it will be assumed that the relevant I&AP or State Department has no comment to provide.

9 CONCLUSIONS AND RECOMMENDATIONS

9.1 Environmental Impact Statement

Based on the outcome of the significance scoring noted in Section 5.3, the overall significance impact without mitigation of the proposed school and temporary conservancy tank area, is considered to be Low. With mitigation, the overall significance impact is considered to be remain Low.

The greatest impact of significance is considered to be the potential for increased Traffic in the area. However, with the correct mitigation measures employed as noted in Section 5 and as per the EMPr, these impacts can be significantly reduced.

Assuming all phases of the project adhere to the conditions contained in the EMPr (Appendix H) it is believed that the impacts associated with the proposed amendments will have no significant, adverse, long term environmental impact on the surrounding environment.

Positive impacts associated with construction include:

- Provision of formal safe infrastructure;
- Economic growth and development;
- Employment opportunities and skills development.

It is perceived that these impacts will be medium to long term and have sustainable benefits. It must be ensured that the construction phase, in no way, hampers the health of any of the ecological systems identified on site, and that post-construction rehabilitation leaves the surrounding environments in an as good, if not better, state.

After the construction phase of the project, the contractors must ensure that all hazardous materials are removed from the site and that site is rehabilitated as per the requirements of the EMPr (Appendix H).

Any alien plant management programmes that are implemented during the construction phase must be maintained during the construction defects liability period.

9.2 Recommendations and opinion of the EAP

The proposed development should not result in any impacts on the natural or social environment that are highly detrimental, nor result in undue risks to the natural environment. The nature and types of negative impacts do not outweigh the potential benefits of this project, provided that the short term localised impacts of the construction and operational phase are adequately mitigated. In this regard, an EMPr has been compiled and is attached to this report (see Appendix H). It is recommended that external monthly EMPr monitoring takes place by an independent Environmental Control Officer (ECO) to ensure that the requirements of the EMPr are being correctly implemented, thus ensuring the protection of the surrounding environment during construction.

It is the recommendation of the EAP that the following management and mitigation measures be incorporated into any project approvals which may be issued:

- All conditions and requirements of the project Environmental Management Programme (EMPr) (Appendix H) must be adhered to; and
- All recommendations noted in the Wetland Risk Assessment and Engineers recommendations (Appendix E and F) must be adopted and followed by the contractor.

Further, in terms of Environmental Monitoring, the following is recommended:

- An ECO must audit the site once a month during construction until completion of the rehabilitation phase of project; and
- The Project Manager is responsible to ensure that an Environmental Audit Report is submitted to the EDTEA: Compliance and Monitoring for the duration of the construction period and oversee the decommissioning of the conservancy tanks.

Based on the findings of this Part 2 Amendment process, it is the opinion of the EAP that the proposed amendment be approved by the Competent Authority, provided that the Applicant (and those employed by the Applicant) complies with the mitigation measures listed above as well as those listed in the EMPr.

10 APPENDICES

Appendix A.1: Environmental Authorisation (DC22/0061/08)
Appendix A.2: Amendment of Environmental Authorisation (DC22/Amend/0061/2018)
Appendix A.3: Application for Amendment of Environmental Authorisation (DC22/0061/2008/AMEND/2018/2020)
Appendix B: EAP CVs
Appendix C: Draft Concept Layout
Appendix D: Etham College Prospectus
Appendix E: Engineering Letter and Drawing
Appendix F: Wetland Risk Assessment
Appendix G: Traffic Impact Assessment
Appendix H: Environmental Management Programme (EMPr)
Appendix I.1: Advertisement
Appendix I.2: Letter Drops
Appendix I.3: On Site Notice Boards
Appendix I.4: IAP Database