

**APPENDIX F1A: AQUATIC S24G OPINION  
LETTER**



ENVIRONMENTAL AND SOCIAL ADVISORY SERVICES

14 November 2019

Attention: Michael Johnson

**AQUATIC SPECIALIST OPINION: SECTION 24G RECTIFICATION PROCESS FOR PROPOSED DOOR OF HOPE CHILDRENS MISSION VILLAGE ESTATE**

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

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

CES was appointed to provide an aquatic specialist opinion on the impacts of the infrastructure developments that took place on site prior to approval.

**Triggered Activities:**

The triggered activity resulted from the clearing of indigenous vegetation within a Critical Biodiversity Area and the construction of 3 Housing Units, a short dirt road and a 10 kl Sewerage Package Plant towards the southern boundary of the property. Figure 1 shows the extent of the disturbed areas on site.

**Coastal and Environmental Services (Pty) Ltd**

T +27 43 726 7809 | F +27 43 726 8352

25 Tecoma Street, Berea, East London, 5214 | PO Box 8145, East London,

Reg no: 2012/151672/07

[www.cesnet.co.za](http://www.cesnet.co.za)

Directors: Z Mayet, JW King, and AM Avis.



Figure 1. Map of the disturbed areas on site.

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**Sensitivity:**

Based on desktop analysis of the site, the infrastructure developments and construction activities that took place on site, appear to be more 240m from the nearby watercourses outside of moderate and high sensitivity areas (Figure 2).

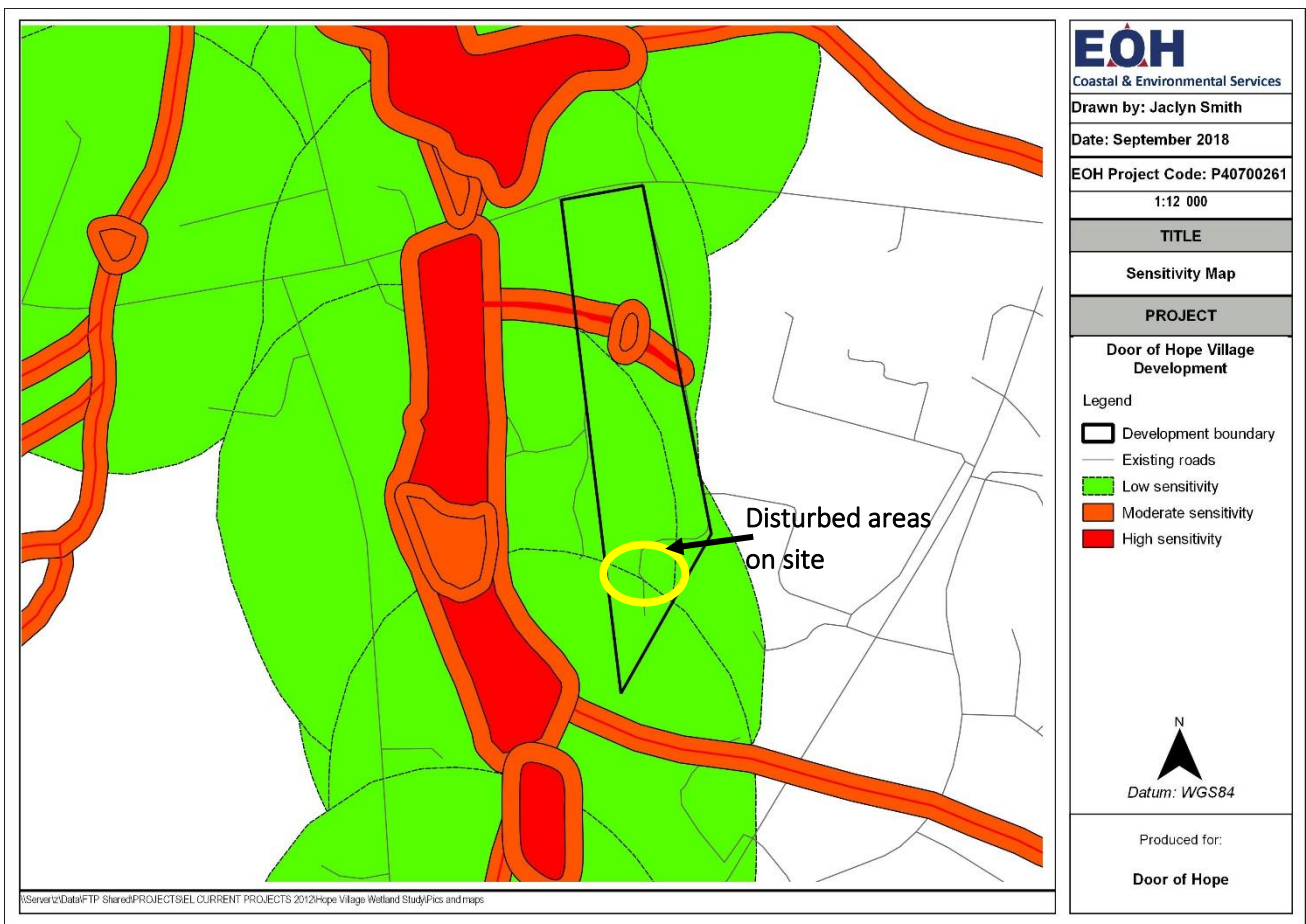


Figure 2. Sensitivity Map of watercourses surrounding the study area showing the location of the disturbed area on site.



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**Concluding Remarks:**

It is of the specialist's opinion that there were no impacts on the aquatic and wetland environment surrounding the development and all activities took place within the low sensitivity areas. The specialist would advise that all mitigation measures and recommendations mentioned in the Aquatic and Wetland Assessment Report prepared in support of the original Basic Assessment Report Process be included in the Environmental Management Programme (EMPr) for the NEMA Section 24G Rectification application.

Kind regards,

Ms Jaclyn Smith  
Wetland Specialist

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