



## **GAUTENG PROVINCE**

AGRICULTURE AND RURAL DEVELOPMENT  
REPUBLIC OF SOUTH AFRICA

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Dear Manqoba Thwala

**COMMENTS ON THE DRAFT BASIC ASSESSEMENT REPORT: FOR THE CONSTRUCTION OF DUAL FILLING STATIONS ALONG EAST AND WEST OF R82 (VEREENIGING ROAD) ON THE REMAINDER OF PORTION 36 OF THE FARM OLIFANTSVLEI 327 IQ WITHIN, CITY OF JOHANNESBURG METROPOLITAN MUNICIPALITY.**

The draft Basic Assessment Report (DBAR) regarding the above -mentioned activity received by the Department on 04 October 2017 has reference.

The proposal entails the development of dual filling Stations which triggers Activity 14 of Listing Notice 1 of the Environmental Impact Assessment Regulations, 2014. The proposed activity is located along the east and west of R82 (Vereeniging road) of the City of Johannesburg Metropolitan Municipality (COJMM).

The Department will like to comment as follows:

**A. Alignment of the activity with applicable legislations and policies**

The report has made provision to accommodate GNR 983 (Listing Notice 1) Environmental Impact Assessment Regulations, 2014. The Environmental Assessment Practitioner (EAP) needs to consider other applicable legislation, policies and guidelines pertaining to the proposed project such the GAUTENG Conservation Plan Version 3.3 and the Gauteng Provincial Environmental Management Framework (GPEMF), 2015.

**B. Guidelines GDARD requirements**

According to the Departmental Conservation Plan Version 3.3, Irreplaceable Critical Biodiversity Area, contains priority grassland as classified by SANBI, Class 2 Ridge, Suitable habitat for orange listed and red listed plants, Primary Vegetation and a Wetland have been identified on the site.

### C. Alternatives

The report covered the following alternatives:

Alternative 1: Construction of the Northbound Filling Stations on Alternative Site 1, along West of Vereeniging Road (R82) on Portion 36 of farm Olifantsvlei 327 IQ in the South of Johannesburg.  
Alternative 2: Construction of the Southbound filling station on alternative site 2, along the East of Vereeniging Road (R82) on Portion 36 of Farm Olifantsvlei 327 IQ in the South of Johannesburg.

Alternative 2 on the eastern side of the R82 appears to be on a sensitive environment, which the report is not clearly discussing. The western side (alternative 1) is located closer to what appears to be residential structures and the report is not providing adequate information regarding the status of the subject residential structures. The Department would like to have detail information regarding the issues and whether the proposed filling station will result in the relocation of this community and how such process will be undertaken if required.

**NB: You must consider the NO-GO Alternative.**

### D. Significant rating of impacts

The significant rating of impacts does not meet the "expected standard" in that the rating is not preceded by information collected using credible methods of data collection. This is based on the view that the wetland study appears to be a desktop product and it does not even provide delineation maps, which would form part of sensitivity map of the site.

### E. Locality map and layout plans or facility illustrations

At least one clear well projected A3 Locality Map and an environmental sensitivity composite map must be included in the Final BAR. The Layout Plan must be legible with a legend easily linked to activity components.

### F. EMPr

The EMPr is noted and needs to address impacts that may arise from the proposed activities on your proposed sites. Please note the contents of the EMPr must be in line with Appendix 4 of the Environmental Impact Assessment Regulations, 2014.

### F. Public participation process

It is noted that the draft report has been circulated for comments and responses. Any further comments and responses therefore must be included on the final BAR. **Johannesburg Roads Agency (JRA) must be directly consulted regarding the proposed filling stations and associated access and exit roads. Their comments must be incorporated in the final BAR.**

### G. Any other issues noted

- The site layout plan must be clearly labelled and include a legend to indicate the location of all associated infrastructures to be included in the proposed filling station.
- If the proposed filling station is going to impact on the wetland, a Water Use Licence must be obtained from the Department of Water and Sanitation.
- Clearly indicate the proposed project as well as the preferred alternatives for the dual filling station. As it stands at the moment, your alternatives are not clear to the Department.

- A qualified Biodiversity specialist must be appointed to provide an assessment on the environmental sensitivities identified on the proposed site as per the environmental sensitivities identified on Section B of this letter.
- All legislation relevant to this project must be considered and complied with.
- A wetland delineation must be provided in the final Basic Assessment Report (FBAR)
- Specialist studies need to be signed by the specialist that prepared them.
- Details of the expertise of the EAP, including a curriculum vitae must be included in the Final report.
- The application form must be amended to include project specific activities in line with the Environmental Impact Assessment Regulations, 2014.
- Provide an environmental sensitivity map overlain on the layout plans.
- Heritage Study must be conducted before the houses can be demolished.
- All comments raised and submitted by City of Johannesburg Environment and Infrastructure Services Department must be addressed in the final Report.

If you have any queries regarding the contents of this letter, please contact the official of the Department at the number or email address indicated above.

**Yours faithfully**



**Mr. T. Mosia**  
**Acting Director: Impact Management**  
**Date:** 3/11/2017