

# Proposed Expansion of Sports and Recreational Facilities at the Country Club Johannesburg, Gauteng Province

Revised Draft Basic Assessment Report

July 2022

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**Basic Assessment Report in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended, and the Environmental Impact Assessment Regulations, 2014 (Version 1)**

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**Kindly note that:**

1. This **Basic Assessment Report** is the standard report required by GDARD in terms of the EIA Regulations, 2014.
2. This application form is current as of 8 December 2014. It is the responsibility of the EAP to ascertain whether subsequent versions of the form have been published or produced by the competent authority.
3. **A draft Basic Assessment Report must be submitted, for purposes of comments within a period of thirty (30) days, to all State Departments administering a law relating to a matter likely to be affected by the activity to be undertaken.**
4. **A draft Basic Assessment Report (1 hard copy and two CD's) must be submitted, for purposes of comments within a period of thirty (30) days, to a Competent Authority empowered in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended to consider and decide on the application.**
5. Five (5) copies (3 hard copies and 2 CDs-PDF) of the final report and attachments must be handed in at offices of the relevant competent authority, as detailed below.
6. The report must be typed within the spaces provided in the form. The size of the spaces provided is not necessarily indicative of the amount of information to be provided. The report is in the form of a table that can extend itself as each space is filled with typing.
7. Selected boxes must be indicated by a cross and, when the form is completed electronically, must also be highlighted.
8. An incomplete report may lead to an application for environmental authorisation being refused.
9. **Any report that does not contain a titled and dated full colour large scale layout plan of the proposed activities including a coherent legend, overlain with the sensitivities found on site may lead to an application for environmental authorisation being refused.**
10. The use of "not applicable" in the report must be done with circumspection because if it is used in respect of material information that is required by the competent authority for assessing the application, it may result in the application for environmental authorisation being refused.

11. No faxed or e-mailed reports will be accepted. Only hand delivered or posted applications will be accepted.
12. Unless protected by law, and clearly indicated as such, all information filled in on this application will become public information on receipt by the competent authority. The applicant/EAP must provide any interested and affected party with the information contained in this application on request, during any stage of the application process.
13. Although pre-application meeting with the Competent Authority is optional, applicants are advised to have these meetings prior to submission of application to seek guidance from the Competent Authority.

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### **DEPARTMENTAL DETAILS**

Gauteng Department of Agriculture and Rural Development  
Attention: Administrative Unit of the of the Environmental Affairs Branch  
P.O. Box 8769  
Johannesburg  
2000

Administrative Unit of the Sustainable Utilisation of the Environment (SUE) Branch  
Ground floor, Umnotho House, 56 Eloff Street, Johannesburg  
Email Address: bongani.shabangu@gauteng.gov.za

Administrative Unit telephone number: (011) 240 3377/3051  
Department central telephone number: (011) 240 2500

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## PROJECT DETAILS

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<b>Reference No.</b>	:	<u>GAUT 002/22-23/E3247</u>
<b>Title</b>	:	Basic Assessment Process <u>Revised Draft</u> Basic Assessment Report: Proposed Expansion of Sports and Recreational Facilities at the Country Club Johannesburg, Gauteng Province
<b>Authors</b>	:	Savannah Environmental Marike Janse Van Vuuren Mmakoena Mmola
<b>Specialists</b>	:	The Biodiversity Company Rebel Base Collection
<b>Applicant</b>	:	Country Club Johannesburg
<b>Report Status</b>	:	<u>Revised</u> Draft Report for Authority Review and Comment
<b>Date</b>	:	<u>July 2022</u>

**When used as a reference this report should be cited as:** Savannah Environmental (2022). Revised Draft Basic Assessment Report for the Proposed Expansion of Sports and Recreational Facilities at the Country Club Johannesburg, Gauteng Province

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**Appendix B:** Site Photographs

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- Appendix E1: *Proof of Site Notice*  
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Appendix E4: *Communications to and from Interested and Affected Parties*  
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Appendix E6: *Comments and Responses Report*  
Appendix E7: *Comments from I&APs on Basic Assessment (BA) Report*  
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**Appendix F:** Water use license(s) authorisation, SAHRA information, service letters from municipalities, water supply information

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- Appendix G1: *Terrestrial Biodiversity Compliance Statement*  
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- Appendix I1: *Project Consulting Team CVs*  
Appendix I2: *DFFE Screening Tool Report*



## **PURPOSE OF THE REVISED DRAFT BASIC ASSESSMENT REPORT FOR REVIEW**

This Basic Assessment Report has been prepared by Savannah Environmental to assess the potential environmental impacts associated with the project. This process is being undertaken in support of an application for Environmental Authorisation (EA) from the Gauteng Department of Agriculture and Rural Development (GDARD) in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA).

The Draft Basic Assessment (BA) Report was made available for a 30-day public review and comment period from **Monday, 06 June 2022 – Thursday, 07 July 2022** on the Savannah Environmental website - (<https://savannahsa.com/public-documents/other/>).

Comment on the Draft BA Report was received from GDARD on 30 June 2022 where the Department advised that Activity 15 of Listing Notice 3, which among other activity components, includes institutional use, should be applied for in relation to the zoning of the site as well as the geographical areas existing on site. The Department further advised that registered Interested and Affected Parties (I&APs) be duly informed of the inclusion of this activity and that the application form be amended to consider the inclusion of this additional activity.

The Draft BA Report has therefore been revised and is made available for an additional 30-day public participation period from **Thursday, 14 July 2022 – Monday, 15 August 2022** on the Savannah Environmental website - (<https://savannahsa.com/public-documents/other/>).

All comments received and recorded during the 30-day review and comment period of the Draft BA Report that was made available for public review and comment from **Monday, 06 June 2022 – Thursday, 07 July 2022** are included, considered and addressed within this Revised Draft BA Report and within the Comments and Responses Report (refer to **Appendix E6**) submitted to the Competent Authority for review and comment. Comments received during the 30-day review and comment period of the Revised Draft BA Report will be included, considered and addressed within the Final BA Report to be submitted to the Competent Authority for consideration.

Comments on the Revised Draft BA Report should be submitted in writing on or before **15 August 2022** to the contact person below.

Please submit your comments by <b>15 August 2022</b> to:
<b>Nondumiso Bulunga</b> of Savannah Environmental
PO Box 148, Sunninghill, 2157
Tel: 011-656-3237
Mobile: 060 978 8396
Fax: 086-684-0547
Email: <a href="mailto:publicprocess@savannahsa.com">publicprocess@savannahsa.com</a>

Comments can be made as written submission via fax, post, or email.

Changes made in this Revised Draft BA Report are underlined for ease of reference.

(For official use only)

NEAS Reference Number:	
File Reference Number:	
Application Number:	
Date Received:	

If this BAR has not been submitted within 90 days of receipt of the application by the competent authority and permission was not requested to submit within 140 days, please indicate the reasons for not submitting within time frame.

Not applicable

Is a closure plan applicable for this application and has it been included in this report?

if not, state reasons for not including the closure plan.

In terms of Regulation 19 (5) of the National Environmental Management Act (No. 107 of 1998) (NEMA), a closure plan is required where the application for Environmental Authorisation relates to the decommissioning or closure of a facility. Decommissioning or closure of a facility is not applicable to this project.

Has a draft report for this application been submitted to a competent authority and all State Departments administering a law relating to a matter likely to be affected as a result of this activity?

Is a list of the State Departments referred to above attached to this report including their full contact details and contact person?

If no, state reasons for not attaching the list.

Not applicable

Have State Departments including the competent authority commented?

If no, why?

The Draft BA Report was made available to the public (including state departments) from **Monday, 06 June 2022 – Thursday, 07 July 2022**. The Draft BA Report was also submitted to GDARD (the Competent Authority) on **07 June 2022**. Comments on the Draft BA Report were only received from the Competent Authority. No comments were received from other state departments. As per GDARD's recommendation, the Draft BA Report has been revised to include Activity 15 of Listing Notice 3. Comments on the Draft BA Report are included within this Revised Draft BA Report.

This Revised Draft BA Report will be made available to state departments and commenting authorities, including the Competent Authority, for comment. Following the review of the Revised Draft BA Report by the state departments, this report will be updated to include any comments received during the additional 30-day review period.

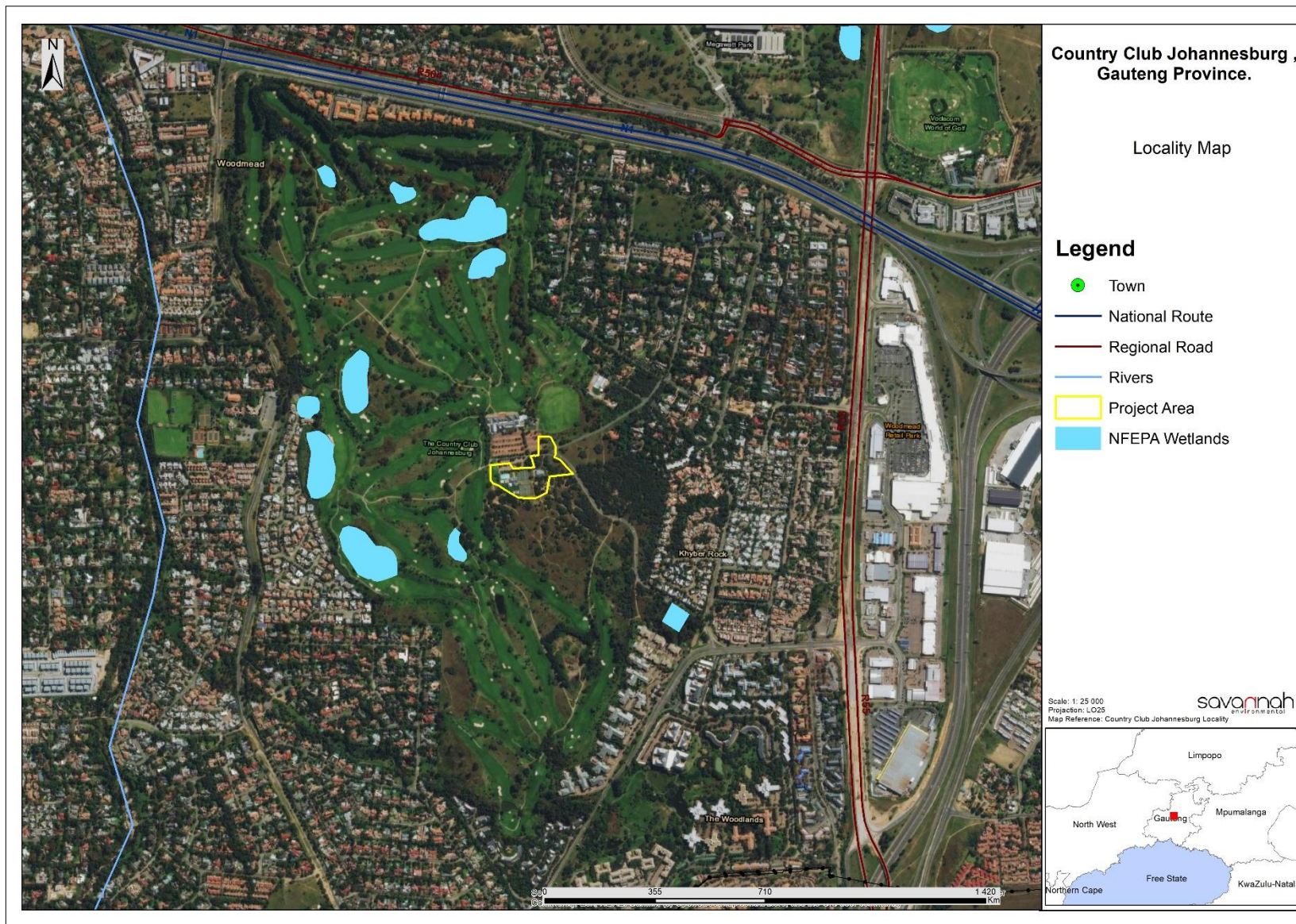
## **SUMMARY AND OVERVIEW OF THE PROPOSED PROJECT**

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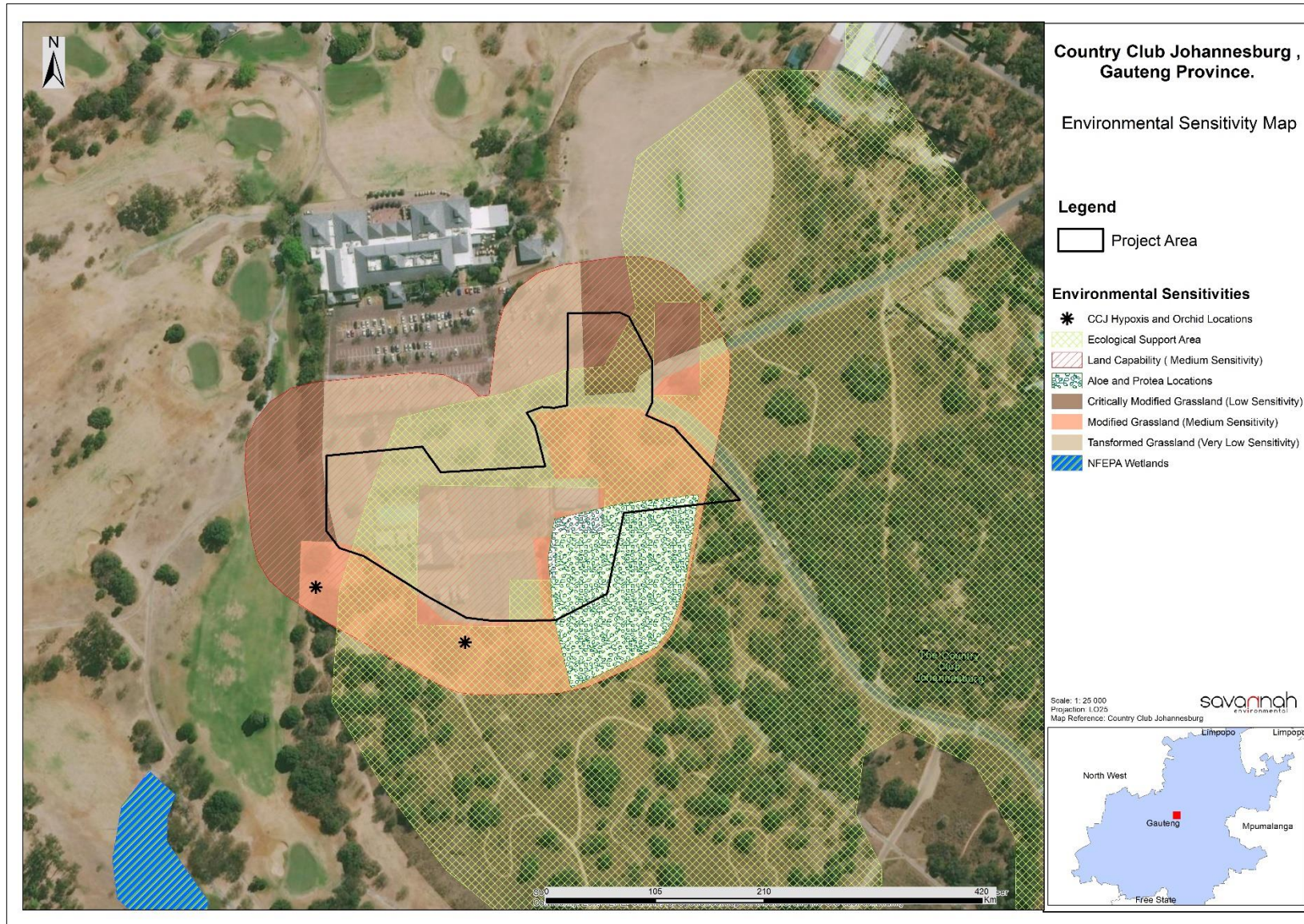
The Country Club Johannesburg is proposing to expand their sports and recreational facilities on Portion 433 of the Farm Rietfontein IR 2, located in Woodmead, Johannesburg, within jurisdiction of the City of Johannesburg Metropolitan Municipality in the Gauteng Province (refer to **Figure A**). This will entail the construction of additional tennis courts and new padel courts; upgrading the existing building at the facility to include a gym, changerooms and squash courts; expanding the parking area; and upgrading the restaurant and bar to provide a modern, multi-sport and family facility for members of the Country Club Johannesburg.

A development footprint of up to ~1.3ha has been identified by Country Club Johannesburg for the expansion of their sports and recreational facilities.

Site-specific studies and assessments have delineated areas of potential sensitivity and identified protected flora and fauna species, as well as alien invasive plant species within the project area (refer to **Figure B**). No environmental fatal flaws were identified in the detailed specialist studies conducted, provided that the recommended mitigation measures are implemented.



**Figure A:** Map showing the location of the proposed activities



**Figure B:** Environmental sensitivity map overlain with the proposed project area

The potential environmental impacts associated with the project identified and assessed through the Basic Assessment (BA) process are summarised below.

### 1.1. Impacts on Terrestrial Ecology (including flora, fauna, avifauna and freshwater resources)

The project area is situated within the Egoli Granite Grassland of the Mesic Highveld Grassland Bioregion. The conservation status of this vegetation community was listed by Mucina and Rutherford (2006) as Endangered and is listed as Critically Endangered based on the National Biodiversity Assessment (NBA) (2018).

According to the Gauteng Conservation Plan, portions of the project area overlap with an Ecological Support Area (ESA). The closest Critical Biodiversity Area (CBA) is the Sandspruit river greenbelt, located approximately 1 km west of the project area.

The project area was superimposed on the terrestrial ecosystem threat status database, and it falls across a Critically Endangered ecosystem. This means that most of the ecosystem type associated with the project area is considered to be at an extremely high risk of collapse

Three habitat units were delineated across the project area, namely, transformed habitat, critically modified grassland and modified grassland. In terms of Site Ecological Importance, the transformed habitat and critically modified grassland are regarded to have very low and low Site Ecological Importance, respectively. The modified grassland is regarded as having medium Site Ecological Importance.

During the survey of the project area undertaken as part of the Terrestrial Ecology Impact Assessment, it was noted that the southern and eastern sections supported four provincially protected plant species: *Eulophia ovalis* var. *bainesii* (Cream courting harlequin orchid), *Aloe maculata* (Soap aloe), *Protea caffra* subsp. *caffra* (Common sugarbush), and *Cussonia paniculata* subsp. *sinuata* (Mountain cabbagetree). One flora species of conservation concern was recorded, namely, *Hypoxis hemerocallidea* (Star-flower), which was observed within the southwestern portion of the project area. The species is listed as 'Declining' by the national red-list.

Due to the various indigenous tree species present as well as the close proximity to watercourses, numerous avifaunal species were observed foraging within the southern sections. Over 20 bird species were recorded, mostly consisting of locally common garden species such as the Green wood-hoopoe, Southern fiscal, and most commonly the Cape glossy starling and the Dark-capped bulbul. Typical grassland species were also observed, such as Quail and Helmeted guineafowl. No avifaunal species of conservation concern were observed; however, it is noted that most wild bird species are regarded as protected game according to provincial legislation.

During the survey of the project area undertaken as part of the Terrestrial Ecology Impact Assessment, no mammal activity was recorded. Although signposts and discussions with staff revealed that *Atelerix frontalis* (Hedgehog) have historically been observed in the region. The Hedgehog is listed as 'Near Threatened' (NT) nationally and is considered protected game by both national and provincial legislation. One herpetofaunal species was observed, namely, *Stigmochelys pardalis* (Leopard tortoise), which is provincially protected and also listed under appendix II of CITES – affording the species international protection.

According to the South African Inventory of Inland Aquatic Ecosystems (SAIIAE) database, the project area is near numerous wetlands and the Sandspruit River. Two wetlands and the river are categorised as

Critically Endangered (CR) and Not Protected (NP), while the pans are categorised as Least Concern (LC) and Poorly Protected (PP).

Based on the sensitivity of the development footprint, a compliance statement was undertaken and not a full impact assessment in accordance with the relevant specialist protocols published in Government Notice 320 of 20 March 2020 and Government Notice 1150 of 30 October 2022.

Since a Terrestrial Biodiversity Compliance Statement was prepared as per Government Notice 320 dated 20 March 2020, an assessment of the identified potential impacts was not undertaken.

It is the opinion of the specialist that the proposed activities may proceed within the confines of the project area, following accordance with the mitigation measures put forward in the Terrestrial Ecology Impact Assessment. Activities that take place within any 'Medium' sensitivity areas (refer to **Figure B**) should only be of a medium impact and must be followed by appropriate rehabilitation measures. There are no fatal flaws for this project.

## **1.2. Impacts on Soils and Agricultural Potential**

Two soil forms were identified within the 50m regulated area of the project area, namely, Glenrosa and Avalon. Of these soil forms, the Avalon soil form is most sensitive.

The land capability of the Avalon soil has been determined to be class "II" (arable land) and the land capability of the Glenrosa soil has been determined to be class "VI" (grazing land). The climate capability of the area has been determined to be level 8 given the low Mean Annual Precipitation and the high evaporation rates. The combination between the determined land capabilities and climate capabilities results in a land potential of "L5" and "L7". The "L5" land potential is regarded to have restricted potential. It has regular and/or moderate to severe limitations due to soil, slope, temperatures or rainfall. The "L7" land potential is regarded to have low potential. It has severe limitations due to soil, slope, temperatures, or rainfall and is non-arable.

The project area is regarded as having a "Moderately low to Moderate" land capability and as such, an agricultural compliance statement has been prepared as opposed to a full impact assessment. Since an agricultural compliance statement was prepared as per Government Notice 320 dated 20 March 2020, an assessment of the identified potential impacts was not undertaken.

Considering the nature of the proposed activities and the low sensitivity of the soil resources identified within the 50 m regulated area, it is the specialist's opinion that no concernable loss of land capability is expected and that no segregation of high production agricultural land will occur. Therefore, it is recommended that the proposed activities proceed as have been planned.

## **1.3. Impacts on Heritage Resources**

A Heritage Impact Assessment was undertaken for the project. In accordance with the Heritage Impact Assessment, there is no significant heritage value to the property and the surrounds of the project area. The land was initially purchased in 1966 and has no heritage structures or signs of heritage landscape. The bulk construction of the proposed construction is planned to be undertaken on already developed land. The surrounding vegetation was planted as part of the complex and makes up a very small area of the total environmentally sensitive landscape.

All development of the property at the Country Club Johannesburg is less than 60 years of age and therefore holds no heritage value.

Given the low sensitivity of the site from an archaeological and cultural heritage perspective, a full assessment of potential impacts on heritage resources was not undertaken by the specialist and no mitigation measures have been proposed for inclusion on the project's EMPr. The Heritage Impact Assessment states that the only mitigation measures required for the development would be environmental.

It is the specialist's opinion that the proposed development proceed with no restrictions as there is no sites of heritage significance within the project area.

#### **1.4. Assessment of Cumulative Impacts**

Cumulative impacts refer to the incremental impacts resulting from the implementation of an activity on a common resource which are added to the impacts of other past, present or reasonably foreseeable future activities.

Given the low – medium sensitivity of the site from a terrestrial ecology, soils, and heritage perspective, compliance statements were undertaken by the terrestrial ecology and soils specialists, and the heritage assessment did not include an assessment of potential impacts. Also given that the site is located within an area that is highly disturbed, and also given the small footprint of the activity, it is not anticipated that the project will result in any significant cumulative impacts.

#### **1.5. Overall Conclusion (Impact Statement)**

The footprint proposed for the development of the sports and recreational facilities proposed by the applicant was assessed by independent specialists as part of the BA process and their findings have informed the results of this BA Report.

The specialist findings have indicated that there are no identified environmental fatal flaws associated with the implementation of the project. Provincially protected plants species were identified within the project area, as well as provincially and nationally protected fauna species. The project area was found to comprise three habitats, namely, transformed habitat, critically modified grassland and modified grassland. The identified habitats are regarded to be on very low, low and medium site ecological importance.

The soils identified within the project area were found to have a moderately low to moderate land capability and Several depressions/pans, an Unchanneled Valley-Bottom wetland, and a Channeled Valley-Bottom Wetland (Sandspruit river) all occur within 1 km of the project area. According to the Heritage Impact Assessment, there is no significant heritage value to the property and the surrounds of the project area. The land was initially purchased in 1966 and has no heritage structures or signs of heritage landscape.

Through assessment of the project within the project area, it can be concluded that the project is environmentally acceptable (subject to implementation of the recommended mitigation measures).



## 1.6. Overall Recommendation

Considering the findings of the independent specialist studies; and the sensitivity ratings of the environmental features identified within the project area, it is the reasoned opinion of the EAP that the expansion of the sports and recreational facilities at the Country Club Johannesburg is acceptable within the project area and can reasonably be authorised.

The period for which the Environmental Authorisation (EA) is required to remain valid is 10 years from the date of authorisation, with a period of 5 years for the design, planning, construction, and commissioning of the activity to be concluded.

The following key conditions would be required to be included within an authorisation issued for the project:

- » All mitigation measures must be adhered to as stipulated within the EMPr.
- » High visibility flags must be placed near any protected or threatened plants (Species of Conservation Concern) in order to avoid any damage or destruction of the species until the relevant permit is obtained for destruction or translocation (if destruction or relocation is necessary). All red-data plants that will be affected by the development should be relocated. Any individual protected plant that was observed needs a relocation or destruction permit for any individual that may be removed or destroyed as a result of the activities. Preferably, the plants should be relocated to an area that will not be impacted on by future activities.
- » It should be made an offence for any staff to take/bring any plant species into/out of any portion of the project area. No plant species, whether indigenous or exotic, should be brought into/taken from the project area, to prevent the spread of exotic or invasive species or the illegal collection of plants.
- » No trapping, killing, or poisoning of any wildlife is to be allowed. Signs stating that the trapping, killing, or poisoning of any wildlife is not allowed must be put up at the site.
- » Should any SCC fauna be observed within the project area before or during construction, all activities must cease immediately until the animal moves off. A relevant specialist must be consulted in order to facilitate the capture or removal of any animals that do not move off on their own.
- » The compilation and implementation of an alien vegetation management plan is very important, especially because of the invasive species identified on site which, if left unchecked, will continue to grow and spread prolifically leading to further and more significant deterioration to the health of the natural environment within the property area. The plan must especially pertain to any recently cleared and changed areas.

## DEFINITIONS AND TERMINOLOGY

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**Alien species:** A species that is not indigenous to the area or out of its natural distribution range.

**Alternatives:** Alternatives are different means of meeting the general purpose and need of a proposed activity. Alternatives may include location or site alternatives, activity alternatives, process or technology alternatives, temporal alternatives or the 'do nothing' alternative.

**Assessment:** The process of collecting, organising, analysing, interpreting and communicating information which is relevant.

**Biodiversity:** The variables among living organisms from all sources, including, terrestrial, marine and other aquatic ecosystems and the ecological complexes they belong to.

**Commence:** The start of any physical activity, including site preparation and any other activity on site furtherance of a listed activity or specified activity, but does not include any activity required for the purposes of an investigation or feasibility study as long as such investigation or feasibility study does not constitute a listed activity or specified activity.

**Commissioning:** Commissioning commences once construction is completed. Commissioning covers all activities including testing after all components of the wind turbine are installed.

**Construction:** Construction means the building, erection or establishment of a facility, structure or infrastructure that is necessary for the undertaking of a listed or specified activity. Construction begins with any activity which requires Environmental Authorisation.

**Cumulative impacts:** Impacts that result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities (e.g. discharges of nutrients and heated water to a river that combine to cause algal bloom and subsequent loss of dissolved oxygen that is greater than the additive impacts of each pollutant). Cumulative impacts can occur from the collective impacts of individual minor actions over a period and can include both direct and indirect impacts.

**Decommissioning:** To take out of active service permanently or dismantle partly or wholly, or closure of a facility to the extent that it cannot be readily re-commissioned. This usually occurs at the end of the life of a facility.

**Development footprint:** The development footprint is approximately up to 1.3ha in extent. This the area where the infrastructure associated with the expansion activities is planned to be constructed. This is the anticipated actual footprint of the expansion activities, and the area which would be disturbed.

**Direct impacts:** Impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity (e.g., noise generated by blasting operations on the site of the activity). These impacts are usually associated with the construction, operation, or maintenance of an activity and are generally obvious and quantifiable.

**'Do nothing' alternative:** The 'do nothing' alternative is the option of not undertaking the proposed activity or any of its alternatives. The 'do nothing' alternative also provides the baseline against which the impacts of other alternatives should be compared.

**Ecosystem:** A dynamic system of plant, animal and micro-organism communities and their non-living environment interacting as a functional unit.

**Endangered species:** Taxa in danger of extinction and whose survival is unlikely if the causal factors continue operating. Included here are taxa whose numbers of individuals have been reduced to a critical level or whose habitats have been so drastically reduced that they are deemed to be in immediate danger of extinction.

**Environment:** the surroundings within which humans exist and that are made up of:

- i. The land, water and atmosphere of the earth;
- ii. Micro-organisms, plant and animal life;
- iii. Any part or combination of (i) and (ii) and the interrelationships among and between them; and
- iv. The physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well-being.

**Environmental Authorisation (EA):** means the authorisation issued by a competent authority (Limpopo Department of Economic Development, Environment and Tourism (LEDET)) of a listed activity or specified activity in terms of the National Environmental Management Act (No 107 of 1998) (NEMA) and the EIA Regulations promulgated under the NEMA.

**Environmental Assessment Practitioner (EAP):** An individual responsible for the planning, management and coordinating of EMPRs plan or any other appropriate environmental instruments introduced by legislation.

**Environmental Control Officer (ECO):** An individual appointed by the Owner prior to the commencement of any authorised activities, responsible for monitoring, reviewing and verifying compliance by the EPC Contractor with the environmental specifications of the EMPr and conditions of the EA.

**Environmental impact:** An action or series of actions that have an effect on the environment.

**Environmental management:** Ensuring that environmental concerns are included in all stages of development, so that development is sustainable and does not exceed the carrying capacity of the environment.

**Environmental Management Programme (EMPr):** An operational plan that organises and co-ordinates mitigation, rehabilitation, and monitoring measures in order to guide the implementation of a proposal and its ongoing maintenance after implementation.

**Habitat:** The place in which a species or ecological community occurs naturally.

**Heritage:** That which is inherited and forms part of the National Estate (Historical places, objects, fossils as defined by the National Heritage Resources Act of 2000).

**Hazardous waste:** Any waste that contains organic or inorganic elements or compounds that may, owing to the inherent physical, chemical or toxicological characteristics of that waste, have a detrimental impact on health and the environment.

**Indigenous:** All biological organisms that occurred naturally within the study area prior to 1800.

**Indirect impacts:** Indirect or induced changes that may occur because of the activity (e.g., the reduction of water in a stream that supply water to a reservoir that supply water to the activity). These types of impacts include all the potential impacts that do not manifest immediately when the activity is undertaken, or which occur at a different place because of the activity.

**Interested and affected party (I&AP):** Individuals or groups concerned with or affected by an activity and its consequences. These include the authorities, local communities, investors, work force, consumers, environmental interest groups, and the public.

**No-go areas:** Areas of environmental sensitivity that should not be impacted on or utilised during the development of a project as identified in any environmental reports.

**Pollution:** A change in the environment caused by substances (radio-active or other waves, noise, odours, dust or heat emitted from any activity, including the storage or treatment or waste or substances.

**Pre-construction:** The period prior to the commencement of construction, this may include activities which do not require Environmental Authorisation (e.g., geotechnical surveys).

**Project area:** The project area is that identified area where the expansion activities area planned to be located. This area has been selected as a practicable option for the expansion activities, considering technical preference and constraints, and has been assessed within this report and by the respective specialists.

**Project description:** A description of the proposed project that includes technical details of the siting, operation.

**Significant impact:** An impact that by its magnitude, duration, intensity, or probability of occurrence may have a notable effect on one or more aspects of the environment.

## DETAILS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

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Savannah Environmental has been appointed as the independent environmental consultancy to undertake the Environmental Basic Assessment, to identify and assess the potential environmental impacts associated with the proposed solar energy facility. Neither Savannah Environmental nor any of its specialist sub-consultants on this project are subsidiaries of or are affiliated to Northam Platinum Limited. Furthermore, Savannah Environmental does not have any interests in secondary developments that may arise out of the authorisation of the proposed project.

Savannah Environmental is a specialist environmental consulting company providing holistic environmental management services, including environmental impact assessments (EIA) and planning to ensure compliance and evaluate the risk of development, and the development and implementation of environmental management tools. Savannah Environmental benefits from the pooled resources, diverse skills and experience in the environmental field held by its team.

The Savannah Environmental team has considerable experience in EIAs and environmental management and has been actively involved in undertaking environmental studies for a wide variety of projects throughout South Africa, including those associated with electricity generation.

The project team responsible for this Basic Assessment process include:

- » **Marike Janse Van Vuuren**, the principle author of this BA Report, is an Environmental compliance consultant with 8 years of experience as an EO/ECO and Environmental Consultant in the Environmental Construction industry. Marike holds an honours degree in Geography with an undergraduate degree in Geography and Environmental Management and is a registered Candidate Environmental Assessment Practitioner – 2020/1677 (EAPASA). She gained experience in various projects, including road construction and renewable energy projects. Marike has extensive experience in Environmental Compliance and auditing, report writing, report reviewing for various construction projects.
- » **Mmakoena Mmola**, the principle Environmental Assessment Practitioner (EAP) for this project, holds a B.Sc. Honours in Geochemistry from the University of the Witwatersrand and over 4 years of experience in the environmental management field. Her key focus is on undertaking environmental impact assessments, environmental permitting and authorisations, compliance auditing, public participation, and environmental management programmes. She is registered as a Professional Natural Scientist with the South African Council for Natural Scientific Professions (SACNASP), Registration Number: 126748 and an EAP with the Environmental Assessment Practitioners Association of South Africa, Number: 2019/260.
- » **Nondumiso Bulunga**, the Public Participation Consultant for this project, is a Social, GIS and Stakeholder Engagement Specialist at Savannah Environmental. Nondumiso has eight (8) years working experience in project management and facilitation in various industries such as environmental services field including but not limited to recycling, industrial, energy, mining, and agriculture. Working for small and large organisations, Nondumiso has gained exposure in research, collection of data, critical analysis, GIS, and environmental solutions. Nondumiso has worked on projects in South Africa and Malawi. Nondumiso is very well versed in the IFC Environmental and Social Performance Standards (including

IFC PS 2012) and the associated Equator Principles, which have informed the approach and standard for projects regarding ESIA. Nondumiso is skilled at organising and driving effective project teams at a scale relevant to the project's requirements. She has technical experience and can quickly identify the most pertinent issues of a particular project whilst focussing on driving project success by rigorously implementing project management tools.

Curricula Vitae (CVs) detailing Savannah Environmental team's expertise and relevant experience are provided in **APPENDIX I1**.

## SECTION A: ACTIVITY INFORMATION

### 1. PROPOSAL OR DEVELOPMENT DESCRIPTION

**Project title (must be the same name as per application form):**

Proposed expansion of sports and recreational facilities at the Country Club Johannesburg, Gauteng Province

Select the appropriate box

The application is for an upgrade of an existing development

The application is for a new development

Other, specify

Does the activity also require any authorisation other than NEMA EIA authorisation?

 NO

If yes, describe the legislation and the Competent Authority administering such legislation

N/A

If yes, have you applied for the authorisation(s)?

If yes, have you received approval(s)? (attach in appropriate appendix)

### 2. APPLICABLE LEGISLATION, POLICIES AND/OR GUIDELINES

List all legislation, policies and/or guidelines of any sphere of government that are applicable to the application as contemplated in the EIA regulations:

Title of legislation, policy or guideline:	Administering authority:	Promulgation Date:
National Environmental Management Act, 1998 (Act No. 107 of 1998 as amended).	National	27 November 1998
Environmental Impact Assessment Regulations, 2014 (No. 326, 7 April 2017) of the National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998).	National	7 April 2017
Constitution of the Republic of South Africa (Act No. 108 of 2006)	National	2006
The National Environmental Management Biodiversity Act (Act No. 10 of 2004) (NEM:BA)	National	2004
The National Environmental Management: Waste Act, 2008 (Act 59 of 2008)	National	2008
National Environmental Management Air Quality Act (No. 39 of 2004)	National	2004
National Forest Act (Act No. 84 of 1998)	National	1998
National Heritage Resources Act, 1999 (Act No. 25 of 1999)	National	1999
Alien and Invasive Species Regulations, 2014	National	2014

Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983)	National	1983
National Water Act (NWA, 1998)	National	1998
Gauteng Provincial Environmental Management Framework, 2014	Provincial	2014
Transvaal Nature Conservation Ordinance No. 12 of 1983	Provincial	1983

Description of compliance with the relevant legislation, policy or guideline:

Legislation, policy or guideline	Description of compliance
National Environmental Management Act, 1998 (Act No. 107 of 1998 as amended) and Environmental Impact Assessment Regulations, 2014 (No. 326, 7 April 2017) of the National Environmental Management Act (NEMA), 1998 (Act No. 107 of 1998).	The project area falls within a Critically Endangered Ecosystem and therefore triggers Activity 12 of Listing Notice 3 as 1.3ha of indigenous vegetation will be cleared. <u>The project also triggers Activity 15 of Listing Notice 3 as it entails the transformation of land bigger than 1000m<sup>2</sup> in size to, among other activity components, institutional use, where such land was zoned open space, conservation, or had an equivalent zoning on or after 02 August 2010.</u>
Constitution of the Republic of South Africa (Act No. 108 of 2006)	There are no permitting requirements associated with this Act. The application of the Environmental Right however implies that environmental impacts associated with proposed development are considered separately and cumulatively. It is also important to note that the "right to an environment clause" includes the notion that justifiable economic and social development should be promoted, through the use of natural resources and ecologically sustainable development.
The National Environmental Management Biodiversity Act (Act No. 10 of 2004) (NEM:BA)	Under NEM:BA, a permit would be required for any activity that is of a nature that may negatively impact on the survival of a listed protected species.  The Terrestrial Ecology Impact Assessment (refer to <b>Appendix G1</b> ) undertaken for this project identified flora species protected in terms of the NEM:BA. The Assessment did however identify one fauna species, namely, Hedgehog, which is protected according to section 57 of the NEM:BA
The National Environmental Management: Waste Act, 2008 (Act 59 of 2008) (NEM:WA)	No waste management license will be required for the construction of the proposed activity. Only a limited amount of solid construction waste will be stored and handled on the site, before being hauled away and dumped at the nearest registered landfill site.
National Environmental Management Air Quality Act (No. 39 of 2004) (NEM:AQA)	During the construction phase, dust and noise may be generated from the site. However, given the extent of the Johannesburg Country Club within which the activity is proposed, it is unlikely that significant dust and noise impacts will be experienced by residents residing within the residential areas surrounding the facility. Nonetheless, measures to mitigate dust and noise impacts during the have been proposed and included in the EMPr for implementation during construction.



<p>National Forest Act (Act No. 84 of 1998) (NFA)</p>	<p>A license is required for the removal of protected trees. It is therefore necessary to conduct a survey that will determine the number and relevant details pertaining to protected tree species present in the development footprint for the submission of relevant permits to authorities prior to the disturbance of these individuals.</p> <p>The Terrestrial Ecology Impact Assessment (refer to <b>Appendix G1</b>) undertaken as part of this project identified no trees which are protected under the NFA.</p>
<p>National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA)</p>	<p>According to the Heritage Impact Assessment (refer to <b>Appendix G3</b>), there is no significant heritage value to the property and the surrounds in question. The land was purchased in 1966 and has no heritage structures or signs of heritage landscape. The bulk construction of the proposed construction is on already developed land.</p>
<p>Alien and Invasive Species Regulations, 2014</p>	<p>Several category 1b alien invasive plants were recorded in the project area, namely, <i>Lantana camara</i>, <i>Gleditsia triacanthos</i>, <i>Ipomoea purpurea</i>, and <i>Verbena bonariensis</i>. Large areas of the open grassland within the project area are invaded by tall <i>Erigeron</i> spp. And <i>Helichrysum</i> spp. Weeds, with minor sections of dense <i>Bidens Pilosa</i> were recorded. The north-eastern portion was found to be critically modified due to the presence of manicured <i>Kikuyu</i> grasses and large exotic <i>Platanus occidentalis</i> and <i>Gleditsia triacanthos</i> trees.</p>
<p>Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983)</p>	<p>CARA will find application throughout the life cycle of the project. In this regard, soil erosion prevention and soil conservation strategies need to be developed and implemented. In addition, a weed control and management plan must be implemented.</p> <p>In terms of Regulation 15E (GN R1048) where Category 1, 2 or 3 plants occur a land user is required to control such plants by means of one or more of the following methods:</p> <ul style="list-style-type: none"> <li>» Uprooting, felling, cutting or burning.</li> <li>» Treatment with a weed killer that is registered for use in connection with such plants in accordance with the directions for the use of such a weed killer.</li> <li>» Biological control carried out in accordance with the stipulations of the Agricultural Pests Act (No. 36 of 1983), the ECA and any other applicable legislation.</li> <li>» Any other method of treatment recognised by the executive officer that has as its object the control of plants concerned, subject to the provisions of sub-regulation 4.</li> <li>» A combination of one or more of the methods prescribed, save that biological control reserves and areas where biological control agents are effective shall not be disturbed by other control methods to the extent that the agents are destroyed or become ineffective.</li> </ul>

<p>National Water Act (NWA, 1998)</p>	<p>The Act provides for the management of South Africa's water resources. It aims to ensure that the Republic's water resources are protected, used, developed, conserved and controlled. According to the Act, any proposed water uses must be specified and registered and/or licensed. Similarly, any modifications to drainage lines on site must be investigated in terms of water use requirements. The proposed development will require a water use licenses, of which an application thereof has been sent to the relevant authority.</p> <p>Several depressions/pans, an Unchanneled Valley-Bottom wetland, and a Channelled Valley-Bottom Wetland (Sandspruit river) all occur within 1 km of the project area. The proposed activity will not require a water use authorisation (either a full water use license or a general authorisation) from the DWS. There is already a water use license for the Country Club Johannesburg WUL - (Licence No.: 03/A21C/ABCI/1397) (FILE NO: 27/2/1/A21C/11) for undertaking Section 21 (a), (b) (c) and (i) water uses.</p>
<p>Gauteng Provincial Environmental Management Framework, 2014</p>	<p>The aim of the EMF is to guide the protection and enhancement of environmental assets and natural resources along with development patterns to ensure sustainable environmental management and development patterns within and around the Gauteng Province. The project area is located in Zone 1 of the EMF which aims to promote development infill, densification and concentration of urban development within the urban development zones as defined in the Gauteng Spatial Development Framework (GSDF). Land uses compatible with the intention of this zone include urban agriculture, accommodation establishments, roads, sports and sanitation network, Since the proposed activity pertains to the expansion of sports and recreational facilities, it is therefore in line with the land uses regarded to be compatible with the intention of Zone 1.</p>
<p>Transvaal Nature Conservation Ordinance No. 12 of 1983</p>	<p>Four plant species protected in terms of the Transvaal Nature Conservation Ordinance No. 12 of 1983 were identified within the project area: <i>Eulophia ovalis</i> var. <i>bainesii</i> (Cream courting harlequin orchid, <b>Error! Reference source not found.</b>), <i>Aloe maculata</i> (Soap aloe), <i>Protea caffra</i> subsp. <i>caffra</i> (Common sugarbush), and <i>Cussonia paniculata</i> subsp. <i>sinuata</i> (Mountain cabbagetree).</p> <p>Furthermore, two provincially protected fauna species were also recorded onsite, namely, <i>Atelerix frontalis</i> (Hedgehog) and <i>Stigmochelys pardalis</i> (Leopard tortoise)</p>

### 3. ALTERNATIVES

Describe the proposal and alternatives that are considered in this application. Alternatives should include a consideration of all possible means by which the purpose and need of the proposed activity could be

accomplished. The determination of whether the site or activity (including different processes etc.) or both is appropriate needs to be informed by the specific circumstances of the activity and its environment.

The no-go option must in all cases be included in the assessment phase as the baseline against which the impacts of the other alternatives are assessed. **Do not** include the no go option into the alternative table below.

**Note:** After receipt of this report the competent authority may also request the applicant to assess additional alternatives that could possibly accomplish the purpose and need of the proposed activity if it is clear that realistic alternatives have not been considered to a reasonable extent.

Please describe the process followed to reach (decide on) the list of alternatives below

**“alternatives”**, in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to—

- (a) the property on which or location where it is proposed to undertake the activity;
- (b) the type of activity to be undertaken;
- (c) the design or layout of the activity;
- (d) the technology to be used in the activity; and
- (e) the option of not implementing the activity.

No alternatives have been identified, considered and assessed for the proposed activity. Motivation as to why no alternatives have been considered is provided below.

Provide a description of the alternatives considered

<b>No.</b>	<b>Alternative type</b> , either alternative: site on property, properties, activity, design, technology, energy, operational or other (provide details of “other”)	<b>Description</b>
No alternatives have been identified, considered and assessed for the proposed activity. Motivation as to why no alternatives have been considered is provided below.		

In the event that no alternative(s) has/have been provided, a motivation must be included in the table below.

<b>No.</b>	<b>Alternative type</b> , either alternative: site on property, properties, activity, design, technology, energy, operational or other (provide details of “other”)	<b>Description</b>
1	Proposal	(a) Property or location alternatives  Since the proposed activity entails the expansion of sports and recreational facilities at the Country Club Johannesburg, and is

		<p>meant to provide a modern, multi-sport and family facility for members of the Country Club Johannesburg, no property alternatives are considered as the project area is located within the boundary of the Country Club Johannesburg/on the same property as the Country Club Johannesburg. Furthermore, no alternative locations within the boundary of the Country Club Johannesburg are considered as the project area is underlain by deep rock (suitable from a geotechnical perspective) and is partially developed and is therefore deemed favourable for the expansion activities.</p> <p>(b) Activity alternatives                  Owing to the increase in people signing up to be members of the Country Club Johannesburg, there has been a strain on the current available facilities and as such, the need for additional facilities has been identified. Since it is evident that additional facilities are required, no activity alternatives for the project area have been proposed by the applicant.</p> <p>(c) Design or layout alternatives                  The proposed infrastructure will have footprint of approximately 1.3ha. The design and layout thereof are determined by the footprint, as well as the specific requirements of the applicant. No feasible design or layout alternatives were identified for the proposed project.</p> <p>(d) Technology alternatives                  No technology alternatives for the proposed activity have been proposed by the applicant.</p>
2	Alternative 1	
3	Alternative 2	

**4. PHYSICAL SIZE OF THE ACTIVITY**

Indicate the total physical size (footprint) of the proposal as well as alternatives. Footprints are to include all new infrastructure (roads, services etc), impermeable surfaces and landscaped areas:

**Size of the activity:**

Proposed activity **(Total environmental (landscaping, parking, etc.) and the building footprint)**

1.3ha

**Alternatives:**

Alternative 1 (if any)

Alternative 2 (if any)

or, for linear activities:

**Length of the activity:**

Proposed activity

N/A

**Alternatives:**

Alternative 1 (if any)

Alternative 2 (if any)



m/km

Indicate the size of the site(s) or servitudes (within which the above footprints will occur):

**Size of the site/servitude:**

Proposed activity

1.3ha

**Alternatives:**

Alternative 1 (if any)

Alternative 2 (if any)



Ha/m<sup>2</sup>

**5. SITE ACCESS**

**Proposal**

Does ready access to the site exist, or is access directly from an existing road?

YES

If NO, what is the distance over which a new access road will be built

Describe the type of access road planned:

The project area is located within the boundary of the Country Club Johannesburg and access to the site will be via Woodlands Drive and Lincoln Street. There are existing tarred roads within the facility that will be utilised to provide direct access to the project area.

Include the position of the access road on the site plan (if the access road is to traverse a sensitive feature the impact thereof must be included in the assessment).

**Alternative 1**

Does ready access to the site exist, or is access directly from an existing road?



If NO, what is the distance over which a new access road will be built

Describe the type of access road planned:



Include the position of the access road on the site plan. (if the access road is to traverse a sensitive feature the impact thereof must be included in the assessment).

**Alternative 2**

Does ready access to the site exist, or is access directly from an existing road?



If NO, what is the distance over which a new access road will be built

Describe the type of access road planned:



Include the position of the access road on the site plan. (if the access road is to traverse a sensitive feature the impact thereof must be included in the assessment).

**PLEASE NOTE: Points 6 to 8 of Section A must be duplicated where relevant for alternatives**

Section A 6-8 has been  Number of times duplicated

(only complete when applicable)

## 6. LAYOUT OR ROUTE PLAN

A detailed site or route (for linear activities) plan(s) must be prepared for each alternative site or alternative activity. It must be attached to this document. The site or route plans must indicate the following:

- the layout plan is printed in colour and is overlaid with a sensitivity map (if applicable);
- layout plan is of acceptable paper size and scale, e.g.
  - A4 size for activities with development footprint of 10sqm to 5 hectares;
  - A3 size for activities with development footprint of > 5 hectares to 20 hectares;
  - A2 size for activities with development footprint of >20 hectares to 50 hectares);
  - A1 size for activities with development footprint of >50 hectares);
- The following should serve as a guide for scale issues on the layout plan:
  - A0 = 1: 500
  - A1 = 1: 1000
  - A2 = 1: 2000
  - A3 = 1: 4000
  - A4 = 1: 8000 (±10 000)
- shapefiles of the activity must be included in the electronic submission on the CD's;
- the property boundaries and Surveyor General numbers of all the properties within 50m of the site;
- the exact position of each element of the activity as well as any other structures on the site;
- the position of services, including electricity supply cables (indicate above or underground), water supply pipelines, boreholes, sewage pipelines, septic tanks, storm water infrastructure;
- servitudes indicating the purpose of the servitude;
- sensitive environmental elements on and within 100m of the site or sites (including the relevant buffers as prescribed by the competent authority) including (but not limited thereto):
  - Rivers and wetlands;
  - the 1:100 and 1:50 year flood line;
  - ridges;
  - cultural and historical features;
  - areas with indigenous vegetation (even if it is degraded or infested with alien species);
- Where a watercourse is located on the site at least one cross section of the water course must be included (to allow the position of the relevant buffer from the bank to be clearly indicated)

### FOR LOCALITY MAP (NOTE THIS IS ALSO INCLUDED IN THE APPLICATION FORM REQUIREMENTS)

- the scale of locality map must be at least 1:50 000. For linear activities of more than 25 kilometres, a smaller scale e.g. 1:250 000 can be used. The scale must be indicated on the map;
- the locality map and all other maps must be in colour;
- locality map must show property boundaries and numbers within 100m of the site, and for poultry and/or piggery, locality map must show properties within 500m and prevailing or predominant wind direction;
- for gentle slopes the 1m contour intervals must be indicated on the map and whenever the slope of the site exceeds 1:10, the 500mm contours must be indicated on the map;
- areas with indigenous vegetation (even if it is degraded or infested with alien species);
- locality map must show exact position of development site or sites;

- locality map showing and identifying (if possible) public and access roads; and
- the current land use as well as the land use zoning of each of the properties adjoining the site or sites.

A locality map has been included as part of this report as **Appendix A1**. A layout plan has been included as part of this report within **Appendix A2**.

## 7. SITE PHOTOGRAPHS

Colour photographs from the center of the site must be taken in at least the eight major compass directions with a description of each photograph. Photographs must be attached under the appropriate Appendix. It should be supplemented with additional photographs of relevant features on the site, where applicable.

Refer to **Appendix B** for the site photographs.

## 8. FACILITY ILLUSTRATION

A detailed illustration of the activity must be provided at a scale of 1:200 for activities that include structures. The illustrations must be to scale and must represent a realistic image of the planned activity. The illustration must give a representative view of the activity to be attached in the appropriate Appendix.

A facility illustration has been included as part of this report within **Appendix C**.

## SECTION B: DESCRIPTION OF RECEIVING ENVIRONMENT

**Note:** Complete Section B for the proposal and alternative(s) (if necessary)

**Please refer to Section 3 above, no feasible alternatives could be selected. Only the preferred site and layout have been assessed in the BAR.**

### Instructions for completion of Section B for linear activities

- 1) For linear activities (pipelines etc) it may be necessary to complete Section B for each section of the site that has a significantly different environment.
- 2) Indicate on a plan(s) the different environments identified
- 3) Complete Section B for each of the above areas identified
- 4) Attach to this form in a chronological order
- 5) Each copy of Section B must clearly indicate the corresponding sections of the route at the top of the next page.

Section B has been duplicated for  times  
sections of the route

### Instructions for completion of Section B for location/route alternatives

- 1) For each location/route alternative identified the entire Section B needs to be completed
- 2) Each alternative location/route needs to be clearly indicated at the top of the next page
- 3) Attach the above documents in a chronological order

Section B has been duplicated for  times (complete only when  
location/route alternatives appropriate)

### Instructions for completion of Section B when both location/route alternatives and linear activities are applicable for the application

Section B is to be completed and attachments order in the following way

- 1) All significantly different environments identified for Alternative 1 is to be completed and attached in a chronological order; then
- 2) All significantly different environments identified for Alternative 2 is to be completed and attached chronological order, etc.

Section B - Section of Route  (complete only when appropriate  
for above)

Section B – Location/route Alternative No.  (complete only when appropriate  
for above)



### 1. PROPERTY DESCRIPTION

<b>Property description:</b> (Including Physical Address and Farm name, portion etc.)	<b>Farm:</b> Portion 433 of the Farm Rietfontein IR 2, in Woodmead, Johannesburg  <b>Physical address:</b> Lincoln Road, Woodmead, Rivonia, 2128
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### 2. ACTIVITY POSITION

Indicate the position of the activity using the latitude and longitude of the centre point of the site for each alternative site. The co-ordinates should be in decimal degrees. The degrees should have at least six decimals to ensure adequate accuracy. The projection that must be used in all cases is the WGS84 spheroid in a national or local projection.

<b>Alternative:</b>	<b>Latitude (S):</b>	<b>Longitude (E):</b>
	26° 3'7.40"S	28° 4'48.38"E

**In the case of linear activities:**

<b>Alternative:</b>	<b>Latitude (S):</b>	<b>Longitude (E):</b>
1) Starting point of the activity	o	o
2) Middle point of the activity	o	o
3) End point of the activity	o	o

For route alternatives that are longer than 500m, please provide co-ordinates taken every 250 meters along the route and attached in the appropriate Appendix

Addendum of route alternatives attached N/A

The 21 digit Surveyor General code of each cadastral land parcel

PROPOSAL	T	0	J	R	0	0	0	0	0	0	0	0	0	0	2	0	0	4	3	3
ALT. 1																				
ALT. 2																				
etc.																				

### 3. GRADIENT OF THE SITE

Indicate the general gradient of the site.

Flat	1:50 – 1:20	1:20 – 1:15	1:15 – 1:10	1:10 – 1:7,5	1:7,5 – 1:5	Steeper than 1:5
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### 4. LOCATION IN LANDSCAPE

Indicate the landform(s) that best describes the site.

Ridgeline	Plateau	Side slope of hill/ridge	Valley	Plain	Undulating plain/low hills	River front
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**5. GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE**

a) Is the site located on any of the following?

Shallow water table (less than 1.5m deep)	NO
Dolomite, sinkhole or doline areas	NO
Seasonally wet soils (often close to water bodies)	NO
Unstable rocky slopes or steep slopes with loose soil	NO
Dispersive soils (soils that dissolve in water)	NO
Soils with high clay content (clay fraction more than 40%)	NO
Any other unstable soil or geological feature	NO
An area sensitive to erosion	NO

(Information in respect of the above will often be available at the planning sections of local authorities. Where it exists, the 1:50 000 scale Regional Geotechnical Maps prepared by Geological Survey may also be used).

b) are any caves located on the site(s)  NO

If yes to above provide location details in terms of latitude and longitude and indicate location on site or route map(s)

<b>Latitude (S):</b>	<b>Longitude (E):</b>
N/A	N/A

c) are any caves located within a 300m radius of the site(s)  NO

If yes to above provide location details in terms of latitude and longitude and indicate location on site or route map(s)

<b>Latitude (S):</b>	<b>Longitude (E):</b>
N/A	N/A

d) are any sinkholes located within a 300m radius of the site(s)  NO

If yes to above provide location details in terms of latitude and longitude and indicate location on site or route map(s)

<b>Latitude (S):</b>	<b>Longitude (E):</b>
N/A	N/A

If any of the answers to the above are "YES" or "unsure", specialist input may be requested by the Department

**6. AGRICULTURE**

Does the site have high potential agriculture as contemplated in the Gauteng Agricultural Potential Atlas (GAPA 4)?  NO

**Please note:** The Department may request specialist input/studies in respect of the above.

## 7. GROUNDCOVER

To be noted that the location of all identified rare or endangered species or other elements should be accurately indicated on the site plan(s).

Indicate the types of groundcover present on the site and include the estimated percentage found on site

Natural veld - good condition % =	<b>Natural veld with scattered aliens</b> % = 15	Natural veld with heavy infestation % =	Veld dominated by alien species % =	<b>Landscaped (vegetation)</b> % = 30
Sport field % =	Cultivated land % =	<b>Paved surface (hard landscaping)</b> % =5	<b>Building or other structure</b> % = 50	Bare soil % =

**Please note:** The Department may request specialist input/studies depending on the nature of the groundcover and potential impact(s) of the proposed activity/ies.

Are there any rare or endangered flora or fauna species (including red list species) present on the site

YES	
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If YES, specify and explain:

<p><b>Flora:</b></p> <p>During the survey of the project area undertaken as part of the Terrestrial Ecology Impact Assessment, it was noted that the southern and eastern sections supported four provincially protected plant species: <i>Eulophia ovalis</i> var. <i>bainesii</i> (Cream courting harlequin orchid), <i>Aloe maculata</i> (Soap aloes), <i>Protea caffra</i> subsp. <i>caffra</i> (Common sugarbush), and <i>Cussonia paniculata</i> subsp. <i>sinuata</i> (Mountain cabbagetree). One flora species of conservation concern was recorded, namely, <i>Hypoxis hemerocallidea</i> (Star-flower), which was observed within the southwestern portion of the project area. The species is listed as 'Declining' by the national red-list.</p> <p><b>Fauna:</b></p> <p>During the survey of the project area undertaken as part of the Terrestrial Ecology Impact Assessment, no mammal activity was recorded. Although signposts and discussions with staff revealed that <i>Atelerix frontalis</i> (Hedgehog) have historically been observed in the region. The Hedgehog is listed as 'Near Threatened' (NT) nationally and is considered protected game by both national and provincial legislation. One herpetofaunal species was observed, namely, <i>Stigmochelys pardalis</i> (Leopard tortoise), which is provincially protected and also listed under appendix II of CITES – affording the species international protection.</p>
--

Are there any rare or endangered flora or fauna species (including red list species) present within a 200m (if within urban area as defined in the Regulations) or within 600m (if outside the urban area as defined in the Regulations) radius of the site.

YES	
-----	--

If YES, specify and explain:

According to the desktop assessment undertaken as part of the Terrestrial Ecology Impact Assessment, based on the Plants of Southern Africa (BODATSA-POSA, 2019) database, over 1 200 plant species have the potential to occur in the project area and its surroundings. Of these plant species, 7 species are listed as being species of conservation concern and 58 are listed as provincially protected plants.

Are there any special or sensitive habitats or other natural features present on the site?

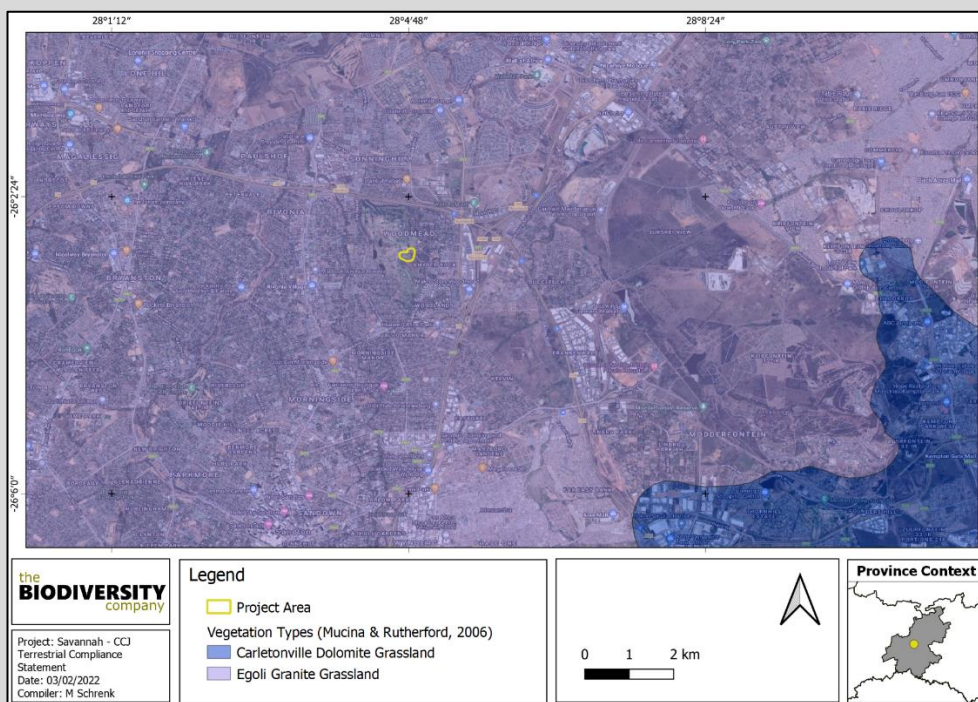
YES	
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If YES, specify and explain:

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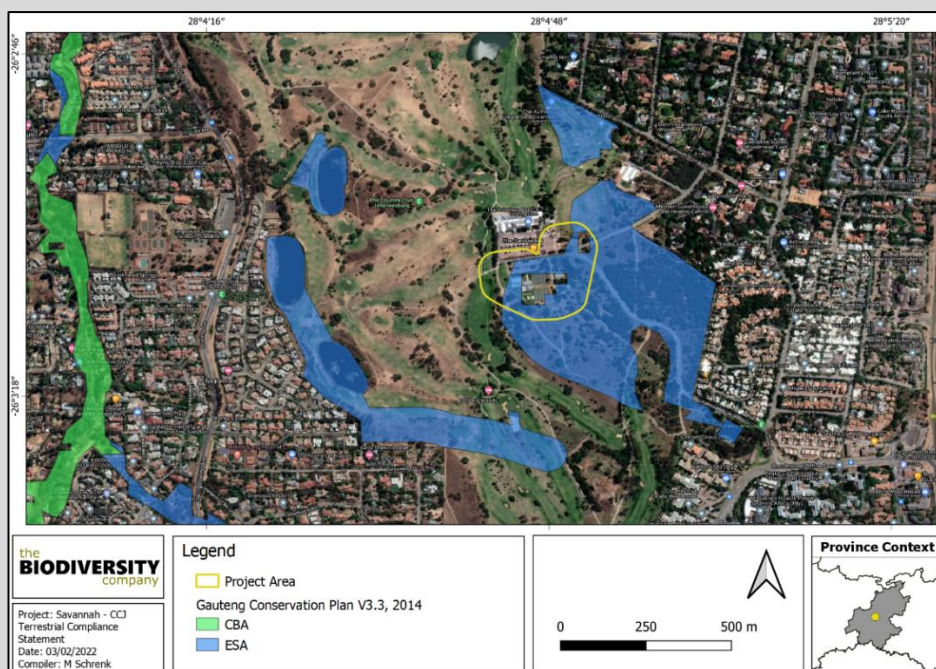
**Flora:**

The project area is situated within the Egoli Granite Grassland of the Mesic Highveld Grassland Bioregion (refer to **Figure 1**). The conservation status of this vegetation community was listed by Mucina and Rutherford (2006) as Endangered and is listed as Critically Endangered based on the National Biodiversity Assessment (NBA) (2018).



**Figure 1:** Map showing the regional vegetation types

According to the Gauteng Conservation Plan, portions of the project area overlap with an Ecological Support Area (ESA) (refer to **Figure 2**). The closest Critical Biodiversity Area (CBA) is the Sandspruit river greenbelt, located approximately 1 km west of the project area.



**Figure 2:** The project area superimposed on the Gauteng Conservation Plan

The project area was superimposed on the terrestrial ecosystem threat status database, and it falls across a Critically Endangered ecosystem. This means that most of the ecosystem type associated with the project area is considered to be at an extremely high risk of collapse

Three habitat units were delineated across the project area, namely, transformed habitat, critically modified grassland and modified grassland (refer to **Figure 3**). In terms of Site Ecological Importance, the transformed habitat and critically modified grassland are regarded to have very low and low Site Ecological Importance, respectively. The modified grassland is regarded as having medium Site Ecological Importance.



**Figure 3:** Habitats delineated within the 50m regulated area of the project area

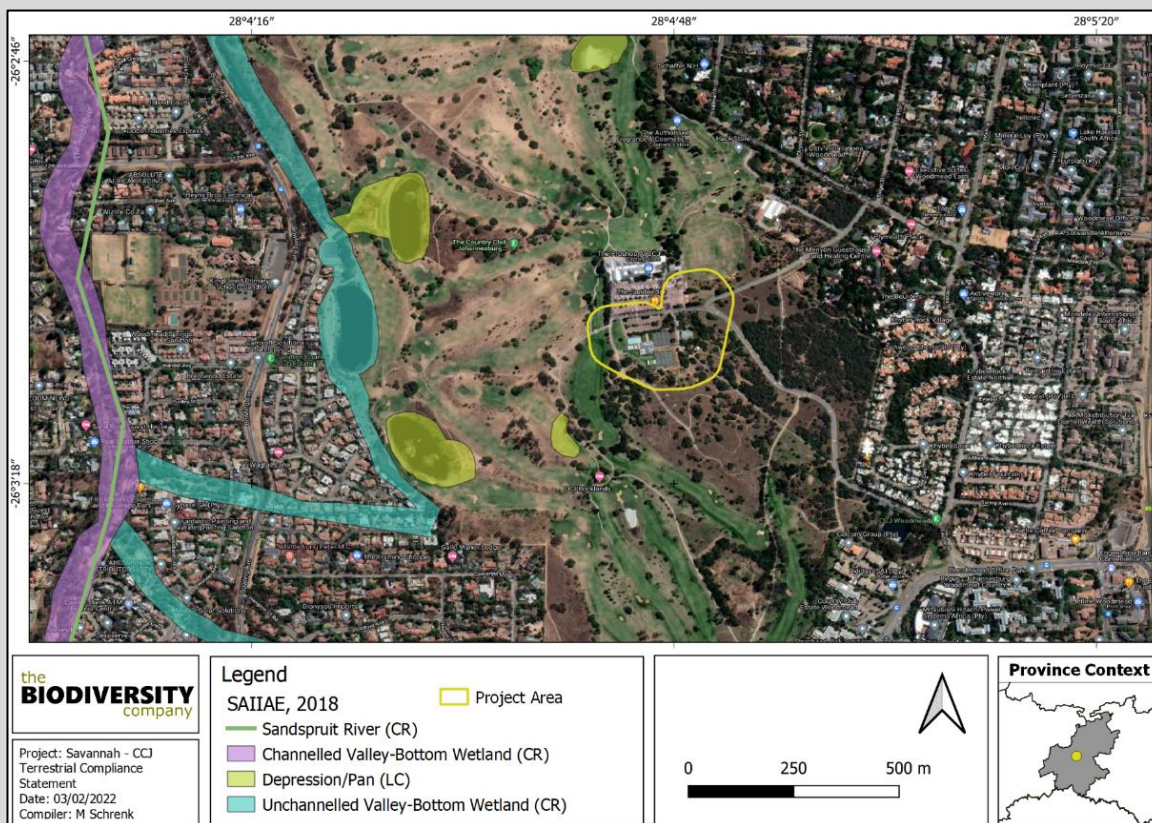
**Fauna (including avifauna):**

Due to the various indigenous tree species present as well as the close proximity to watercourses, numerous avifaunal species were observed foraging within the southern sections. Over 20 bird species were recorded, mostly consisting of locally common garden species such as the Green wood-hoopoe, Southern fiscal, and most commonly the Cape glossy starling and the Dark-capped bulbul. Typical grassland species were also observed, such as Quail and Helmeted guineafowl. No avifaunal species of conservation concern were observed; however, it is noted that most wild bird species are regarded as protected game according to provincial legislation.

During the survey of the project area undertaken as part of the Terrestrial Ecology Impact Assessment, no mammal activity was recorded. Although signposts and discussions with staff revealed that *Aterix frontalis* (Hedgehog) have historically been observed in the region. The Hedgehog is listed as 'Near Threatened' (NT) nationally and is considered protected game by both national and provincial legislation. One herpetofaunal species was observed, namely, *Stigmochelys pardalis* (Leopard tortoise), which is provincially protected and also listed under appendix II of CITES – affording the species international protection.

**Freshwater:**

According to the South African Inventory of Inland Aquatic Ecosystems (SAIIAE) database, the project area is near numerous wetlands and the Sandspruit River (refer to **Figure 4**). Two wetlands and the river are categorised as Critically Endangered (CR) and Not Protected (NP), while the pans are categorised as Least Concern (LC) and Poorly Protected (PP).



**Figure 4:** The project area overlapped with the SAIIE database

**Soils:**

Two soil forms were identified within the 50m regulated area of the project area, namely, Glenrosa and Avalon (refer to **Figure 5**). Of these soil forms, the Avalon soil form is most sensitive.

The land capability of the Avalon soil has been determined to be class “II” (arable land) and the land capability of the Glenrosa soil has been determined to be class “VI” (grazing land). The climate capability of the area has been determined to be level 8 given the low Mean Annual Precipitation and the high evaporation rates. The combination between the determined land capabilities and climate capabilities results in a land potential of “L5” and “L7”. The “L5” land potential is regarded to have restricted potential. It has regular and/or moderate to severe limitations due to soil, slope, temperatures or rainfall. The “L7” land potential is regarded to have low potential. It has severe limitations due to soil, slope, temperatures, or rainfall and is non-arable.



**Figure 5:** Soil forms delineated within the 50m regulated area for the project area

Was a specialist consulted to assist with completing this section

YES

If yes complete specialist details

Name of the specialist:

Michael Douglas

Qualification(s) of the specialist:

Michael Douglas is a soil scientist with experience in soil classification. Michael completed his BSc Honours in environmental science and geological science at the North-West University of Potchefstroom. Michael has been part of various agricultural potential, land capability and pedology studies as part of Environmental Impact Assessments and Basic Assessments

Michael completed his professional Civil and Environmental engineering degree at the University of the Witwatersrand in 2016. He has been working in the fields of project management, biodiversity and habitat assessment and ecological restoration for over 3 years.

Postal address:

Vale Avenue 420, Randburg, Johannesburg

Postal code:

2194

Telephone:

Cell:

+27 76 529 2652

E-mail:

info@thebiodiversitycompany.com

Fax:

+27 86 527 1965

Are any further specialist studies recommended by the specialist?

NO

If YES, specify:

N/A

If YES, is such a report(s) attached?

N/A

If YES list the specialist reports attached below

N/A

Signature of specialist:

Date: 14/03/2022



Name of the specialist:	Michael Schrenk		
Qualification(s) of the specialist:	Michael completed his professional Civil and Environmental engineering degree at the University of the Witwatersrand in 2016. He has been working in the fields of project management, biodiversity and habitat assessment and ecological restoration for over 3 years.		
Postal address:	Vale Avenue 420, Randburg, Johannesburg		
Postal code:	2194		
Telephone:	[REDACTED]	Cell:	+27 81 319 1225
E-mail:	info@thebiodiversitycompany.com	Fax:	+27 86 527 1965
Are any further specialist studies recommended by the specialist?	[REDACTED]	NO	
If YES, specify:	N/A		
If YES, is such a report(s) attached?	N/A		
If YES list the specialist reports attached below	N/A		

Signature of specialist:  Date: 14/03/2022

Name of the specialist:	Vedhant Maharaj		
Qualification(s) of the specialist:	M.Arch (Professional) SACAP PrArch 45968517 SAIA 9004		
Postal address:	3 Gale Rd, Parktown, Johannesburg		
Postal code:	2193		
Telephone:	N/A	Cell:	087 802 0780
E-mail:	vedhant.maharaj@rebelbase.camp	Fax:	N/A
Are any further specialist studies recommended by the specialist?	[REDACTED]	NO	
If YES, specify:	N/A		
If YES, is such a report(s) attached?	N/A		
If YES list the specialist reports attached below	N/A		

Signature of specialist: Vedhant Maharaj Date: 20/04/2022

**Please note:** If more than one specialist was consulted to assist with the filling in of this section then this table must be appropriately duplicated.

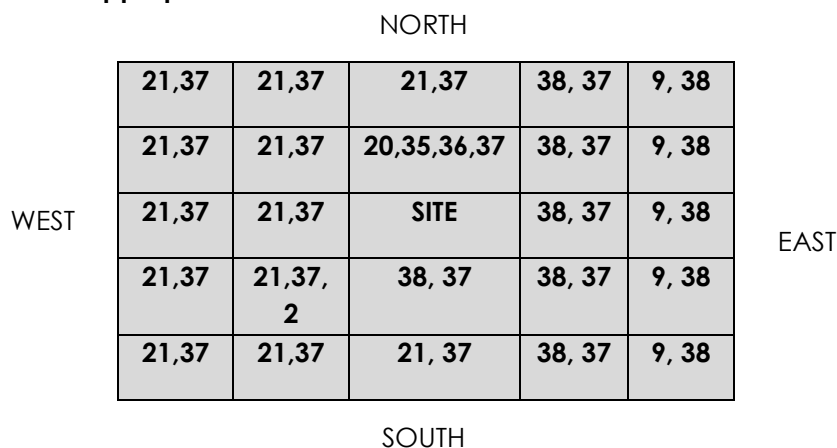
## 8. LAND USE CHARACTER OF SURROUNDING AREA

Using the associated number of the relevant current land use or prominent feature from the table below, fill in the position of these land-uses in the vacant blocks below which represent a 500m radius around the site

1. Vacant land	2. River, stream, wetland	3. Nature conservation area	4. Public open space	5. Koppie or ridge
----------------	---------------------------	-----------------------------	----------------------	--------------------

6. Dam or reservoir	7. Agriculture	8. Low density residential	<b>9. Medium to high density residential</b>	10. Informal residential
11. Old age home	12. Retail	13. Offices	14. Commercial & warehousing	15. Light industrial
16. Heavy industrial <sup>AN</sup>	17. Hospitality facility	18. Church	19. Education facilities	<b>20. Sport facilities</b>
<b>21. Golf course/polo fields</b>	22. Airport <sup>N</sup>	23. Train station or shunting yard <sup>N</sup>	24. Railway line <sup>N</sup>	25. Major road (4 lanes or more) <sup>N</sup>
26. Sewage treatment plant <sup>A</sup>	27. Landfill or waste treatment site <sup>A</sup>	28. Historical building	29. Graveyard	30. Archeological site
31. Open cast mine	32. Underground mine	33. Spoil heap or slimes dam <sup>A</sup>	34. Small Holdings	
Other land uses (describe):	<b>(35) parking areas, (36) small buildings, (37) walking paths/road and (38) veld (natural and landscaped)</b>			

**NOTE: Each block represents an area of 250m X 250m, if your proposed development is larger than this, please use the appropriate number and orientation of hashed blocks**



**Note:** More than one (1) Land-use may be indicated in a block

**Please note:** The Department may request specialist input/studies depending on the nature of the land use character of the area and potential impact(s) of the proposed activity/ies. Specialist reports that look at health & air quality and noise impacts may be required for any feature above and in particular those features marked with an "A" and with an "N" respectively.

Have specialist reports been attached

YES	
-----	--

If yes indicate the type of reports below

Specialist studies undertaken for the project are listed below and included as appendices to the BA Report. The following specialist reports have been compiled:

- » Heritage Impact Assessment
- » Agricultural compliance statement
- » Terrestrial biodiversity compliance statement

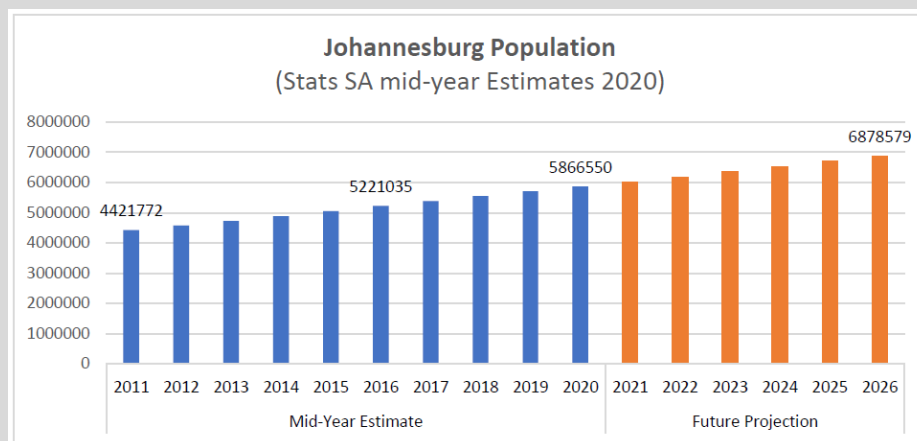
## 9. SOCIO-ECONOMIC CONTEXT

Describe the existing social and economic characteristics of the area and the community condition as baseline information to assess the potential social, economic and community impacts.

The activity is proposed on portion 433 of the Farm Rietfontein IR 2, located in Woodmead, within jurisdiction of the City of Tshwane Metropolitan Municipality in the Gauteng Province. The City of Johannesburg Metropolitan Municipality is a metropolitan municipality that manages the local governance of Johannesburg, South Africa. It is divided into several branches and departments in order to expedite services for the city.

**Demographics of the area:**

The current population of the City of Johannesburg (CoJ) is estimated to be 5.87 million, making it the biggest metro by population size in South Africa.<sup>3</sup> Johannesburg's population constitutes about 40% of the Gauteng population and 10% of South Africa's overall population. Stats SA projects that by 2026, the population of Johannesburg will grow by 1 million people, increasing to 6.88 million.



**Figure 6:** Johannesburg Mid-Year Population Estimates and Projections 2011 to 2026 (Stats SA, 2020)

The bulk of the city's population (41%) are between the ages of 20 – 39 years old. 30% of the population are above the age of 40 and 29% are below the age of 19 years.

**Economic profile:**

Economic growth has been on a slowing trend for most of the past decade in South Africa and its biggest metropolitan economy, Johannesburg. A mix of global and domestic developments were responsible for this outcome, which was further exacerbated by the COVID-19 pandemic and associated economic lockdowns. Economic growth declined from 2.7% in 2011 to just 1.9% in 2019 in the city. Despite this decline, Johannesburg continues to be the engine of the national economy. In 2019 Joburg produced a GDP of R770 billion or as measured in constant 2010 prices (R 1000), R494 million.

The City's economic activity is fairly diverse and characterised by a strong services sector, in particular finance, business services and the trade and logistics sector. While the tertiary sectors (finance and trade) have maintained dominance, the primary and secondary (agriculture, mining, manufacturing) sectors have diminished in importance in the economy.

Employment in the formal sector remains foremost within the city. 73% of total employment in the city takes place within the formal sector. The informal sector employs only 17% of Johannesburg's labour force. Johannesburg, like South Africa, has both a very high unemployment rate and a relatively low informal sector absorption rate compared to the global average of more than 60%.

In terms of the Profile and Analysis District Development Model for the City of Johannesburg Metropolitan, Woodmead falls under Region E: which is considered to be the most economically prominent region

with vast contradictions. It hosts the 'champaign north' with its anchor being the financial hub of Sandton which is the richest square mile in Africa, and it also houses South Africa's oldest and poorest township area called Alexandra. The ultimate core to the economy of this region is considered to be finance, retail and warehousing, which now also hosts the Johannesburg Stock Exchange (JSE). In 1996 it led to the contribution of 25% of the city's economy which increased in 2018 to 27%.

## 10. CULTURAL/HISTORICAL FEATURES

Please be advised that if section 38 of the National Heritage Resources Act 25 of 1999 is applicable to your proposal or alternatives, then you are requested to furnish this Department with written comment from the South African Heritage Resource Agency (SAHRA) – Attach comment in appropriate annexure

38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as-

(a) the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;

(b) the construction of a bridge or similar structure exceeding 50m in length;

(c) any development or other activity which will change the character of a site-

(i) exceeding 5 000 m<sup>2</sup> in extent; or

(ii) involving three or more existing erven or subdivisions thereof; or

(iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or

(iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources

authority;

(d) the re-zoning of a site exceeding 10 000 m<sup>2</sup> in extent; or

(e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.

Are there any signs of culturally (aesthetic, social, spiritual, environmental) or historically significant elements, as defined in section 2 of the National Heritage Resources Act, 1999, (Act No. 25 of 1999), including archaeological or palaeontological sites, on or close (within 20m) to the site?

	NO
--	----

If YES, explain:

N/A

If uncertain, the Department may request that specialist input be provided to establish whether there is such a feature(s) present on or close to the site.

Briefly explain the findings of the specialist if one was already appointed:

A Heritage Impact Assessment was undertaken for the project (refer to **Appendix G3**).

In accordance with the Heritage Impact Assessment, there is no significant heritage value to the property and the surrounds of the project area. The land was initially purchased in 1966 and has no heritage structures or signs of heritage landscape. The bulk construction of the proposed construction is planned to be undertaken on already developed land. The surrounding vegetation was planted as part of the complex and makes up a very small area of the total environmentally sensitive landscape.

All development of the property at the Country Club Johannesburg is less than 60 years of age and therefore holds no heritage value.

Will any building or structure older than 60 years be affected in any way?

	NO
	NO

Is it necessary to apply for a permit in terms of the National Heritage Resources Act, 1999 (Act 25 of 1999)?

If yes, please attached the comments from SAHRA in the appropriate Appendix

## SECTION C: PUBLIC PARTICIPATION (SECTION 41)

### 1. THE ENVIRONMENTAL ASSESSMENT PRACTITIONER MUST CONDUCT PUBLIC PARTICIPATION PROCESS IN ACCORDANCE WITH THE REQUIREMENT OF THE EIA REGULATIONS, 2014.

#### 2. LOCAL AUTHORITY PARTICIPATION

Local authorities are key interested and affected parties in each application and no decision on any application will be made before the relevant local authority is provided with the opportunity to give input. The planning and the environmental sections of the local authority must be informed of the application at least thirty (30) calendar days before the submission of the application to the competent authority.

Was the draft report submitted to the local authority for comment?

YES

If yes, has any comments been received from the local authority?

YES

If "YES", briefly describe the comment below (also attach any correspondence to and from the local authority to this application):

Comments on the Draft BA Report were only received from the Competent Authority (i.e., GDARD). No comments were received from local authorities.

Comment from GDARD was received on **30 June 2022** where the Department advised that Activity 15 of Listing Notice 3, which among other activity components, includes institutional use, should be applied for in relation to the zoning of the site as well as the geographical areas existing on site. The Department further advised that registered I&APs be duly informed of the inclusion of this activity and that the application form be amended to consider the inclusion of this additional activity.

The Draft BA Report has therefore been revised and is made available for an additional 30-day public participation period from **Thursday, 14 July 2022 – Monday, 15 August 2022** on the Savannah Environmental website – (<https://savannahsa.com/public-documents/other/>). Comments received during the 30-day review and comment period of the Revised Draft BA Report will be included, considered and addressed within the Comments and Responses Report included as **Appendix E6** to the Final BA Report to be submitted to the Competent Authority for consideration.

If "NO" briefly explain why no comments have been received or why the report was not submitted if that is the case.

N/A

#### 3. CONSULTATION WITH OTHER STAKEHOLDERS

Any stakeholder that has a direct interest in the activity, site or property, such as servitude holders and service providers, should be informed of the application at least **thirty (30) calendar days** before the submission of the application and be provided with the opportunity to comment.

Has any comment been received from stakeholders?

YES

If "YES", briefly describe the feedback below (also attach copies of any correspondence to and from the stakeholders to this application):

Site notices were placed within the boundary of the Country Club Johannesburg to notify stakeholders of the proposed expansion activities on **15 March 2022**. Comments on the Draft BA Report were only received from the Competent Authority (i.e., GDARD). No comments were received from other key stakeholders.

Comment from GDARD was received on **30 June 2022** where the Department advised that Activity 15 of Listing Notice 3, which among other activity components, includes institutional use, should be applied for in relation to the zoning of the site as well as the geographical areas existing on site. The Department further advised that registered I&APs be duly informed of the inclusion of this activity and that the application form be amended to consider the inclusion of this additional activity.

The Draft BA Report has therefore been revised and is made available for an additional 30-day public participation period from **Thursday, 14 July 2022 – Monday, 15 August 2022** on the Savannah Environmental website – (<https://savannahsa.com/public-documents/other/>). Comments received during the 30-day review and comment period of the Revised Draft BA Report will be included, considered and addressed within the Comments and Responses Report and included in Appendix E6 of the Final BA Report to be submitted to the Competent Authority for consideration.

If "NO" briefly explain why no comments have been received

N/A

#### 4. GENERAL PUBLIC PARTICIPATION REQUIREMENTS

The Environmental Assessment Practitioner must ensure that the public participation process is adequate and must determine whether a public meeting or any other additional measure is appropriate or not based on the particular nature of each case. Special attention should be given to the involvement of local community structures such as Ward Committees and ratepayers associations. Please note that public concerns that emerge at a later stage that should have been addressed may cause the competent authority to withdraw any authorisation it may have issued if it becomes apparent that the public participation process was flawed.

The EAP must record all comments and respond to each comment of the public / interested and affected party before the application report is submitted. The comments and responses must be captured in a Comments and Responses Report as prescribed in the regulations and be attached to this application.

The Draft BA Report was made available for a 30-day review and comment period from **Monday, 06 June 2022 to Thursday, 07 July 2022**, and all written comments received during the initial 30-day review and comment period have been included in the Comments and Responses Report included as **Appendix E6** to the BA Report.

The Draft BA Report has been revised as per GDARD's request and is made available for an additional 30-day public participation period from **Thursday, 14 July 2022 – Monday, 15 August 2022** on the Savannah Environmental website – (<https://savannahsa.com/public-documents/other/>). Comments received during the 30-day review and comment period of the Revised Draft BA Report will be included, considered and addressed within the Comments and Responses included as **Appendix E6** to the Final BA Report to be submitted to the Competent Authority for consideration.

## **5. APPENDICES FOR PUBLIC PARTICIPATION**

All public participation information is to be attached in the appropriate Appendix. The information in this Appendix is to be ordered as detailed below

Appendix 1 – Proof of site notice

Appendix 2 – Written notices issued as required in terms of the regulations

Appendix 3 – Proof of newspaper advertisements

Appendix 4 – Communications to and from interested and affected parties

Appendix 5 – Minutes of any public and/or stakeholder meetings

Appendix 6 – Comments and Responses Report

Appendix 7 – Comments from I&APs on Basic Assessment (BA) Report

Appendix 8 – Comments from I&APs on amendments to the BA Report

Appendix 9 – Copy of the register of I&APs



### SECTION D: RESOURCE USE AND PROCESS DETAILS

**Note:** Section D is to be completed for the proposal and alternative(s) (if necessary)

#### Instructions for completion of Section D for alternatives

- 1) For each alternative under investigation, where such alternatives will have different resource and process details (e.g. technology alternative), the entire Section D needs to be completed
- 4) Each alternative needs to be clearly indicated in the box below
- 5) Attach the above documents in a chronological order

Section D has been duplicated for  times (complete only when appropriate)  
alternatives

Section D Alternative  (complete only when appropriate for above)  
No.

### 1. WASTE, EFFLUENT, AND EMISSION MANAGEMENT

#### Solid waste management

Will the activity produce solid construction waste during the construction/initiation phase?

If yes, what estimated quantity will be produced per month?

How will the construction solid waste be disposed of (describe)?

Where will the construction solid waste be disposed of (describe)?

Will the activity produce solid waste during its operational phase?    
 If yes, what estimated quantity will be produced per month?

How will the solid waste be disposed of (describe)?

Has the municipality or relevant service provider confirmed that sufficient air space exists for treating/disposing of the solid waste to be generated by this activity?

Where will the solid waste be disposed if it does not feed into a municipal waste stream (describe)?

**Note:** If the solid waste (construction or operational phases) will not be disposed of in a registered landfill site or be taken up in a municipal waste stream, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

Can any part of the solid waste be classified as hazardous in terms of the relevant legislation?  YES  NO  
 If yes, inform the competent authority and request a change to an application for scoping and EIA.

Is the activity that is being applied for a solid waste handling or treatment facility?  YES  NO  
 If yes, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

Describe the measures, if any, that will be taken to ensure the optimal reuse or recycling of materials:

Waste separation at source will be adopted during the development as well as recycling as there is a recycling and sorting plant at the facility. There is also a compost yard available at the facility for food waste.

**Liquid effluent (other than domestic sewage)**

Will the activity produce effluent, other than normal sewage, that will be disposed of in a municipal sewage system?  YES  NO  
 If yes, what estimated quantity will be produced per month?   
 If yes, has the municipality confirmed that sufficient capacity exist for treating / disposing of the liquid effluent to be generated by this activity(ies)?

Will the activity produce any effluent that will be treated and/or disposed of on site?  YES  NO  
 If yes, what estimated quantity will be produced per month?

If yes describe the nature of the effluent and how it will be disposed.

There are already existing ablution facilities at the Country Club Johannesburg which will be utilised during the construction phase. The ablution facilities are connected to the municipality's sewage line.

Note that if effluent is to be treated or disposed on site the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA

Will the activity produce effluent that will be treated and/or disposed of at another facility?  YES  NO

If yes, provide the particulars of the facility:

Facility name:	N/A		
Contact person:	N/A		
Postal address:	N/A		
Postal code:	N/A		
Telephone:	N/A	Cell:	N/A
E-mail:	N/A	Fax:	N/A

Describe the measures that will be taken to ensure the optimal reuse or recycling of waste water, if any:

No waste water will be generated on site during the construction phase.

**Liquid effluent (domestic sewage)**

Will the activity produce domestic effluent that will be disposed of in a municipal sewage system?

YES	
-----	--

If yes, what estimated quantity will be produced per month?

N/A	
-----	--

If yes, has the municipality confirmed that sufficient capacity exist for treating / disposing of the domestic effluent to be generated by this activity(ies)?

YES	
-----	--

Will the activity produce any effluent that will be treated and/or disposed of on site?

YES	
-----	--

If yes describe how it will be treated and disposed off.

There are already existing ablution facilities at the Country Club Johannesburg which will be utilised during the construction phase. The ablution facilities are connected to the municipality's sewage line.

**Emissions into the atmosphere**

Will the activity release emissions into the atmosphere?

	NO
--	----

If yes, is it controlled by any legislation of any sphere of government?

	NO
--	----

If yes, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

If no, describe the emissions in terms of type and concentration:

It is not foreseen that the construction phase of the project will result in significant dust impacts and exhaust emissions. The operational phase of a sports and recreational facility does not produce an type of pollution.

**2. WATER USE**

Indicate the source(s) of water that will be used for the activity

<b>municipal</b>	Directly from water board	groundwater	river, stream, dam or lake	other	the activity will not use water
------------------	---------------------------	-------------	----------------------------	-------	---------------------------------

If water is to be extracted from groundwater, river, stream, dam, lake or any other natural feature, please indicate

the volume that will be extracted per month:

N/A
-----

If Yes, please attach proof of assurance of water supply, e.g. yield of borehole, in the appropriate Appendix

Does the activity require a water use permit from the Department of Water Affairs?

	NO
--	----

If yes, list the permits required

The Country Club Johannesburg already have a Water Use License for Section 21(a), (b), (c) and (i) water uses.

If yes, have you applied for the water use permit(s)?  
If yes, have you received approval(s)? (attached in appropriate appendix)



### 3. POWER SUPPLY

Please indicate the source of power supply eg. Municipality / Eskom / Renewable energy source

Eskom

If power supply is not available, where will power be sourced from?

N/A

### 4. ENERGY EFFICIENCY

Describe the design measures, if any, that have been taken to ensure that the activity is energy efficient:

No additional design measures are available yet to verify if the activity will be energy efficient.

Describe how alternative energy sources have been taken into account or been built into the design of the activity, if any:

N/A

## SECTION E: IMPACT ASSESSMENT

The assessment of impacts must adhere to the minimum requirements in the EIA Regulations, 2014, and should take applicable official guidelines into account. The issues raised by interested and affected parties should also be addressed in the assessment of impacts as well as the impacts of not implementing the activity (Section 24(4)(b)(i)).

### 1. ISSUES RAISED BY INTERESTED AND AFFECTED PARTIES

Summarise the issues raised by interested and affected parties.

Comments on the Draft BA Report were only received from the Competent Authority (i.e., GDARD). No comments were received from other I&APs.

Comment from GDARD was received on **30 June 2022** where the Department advised that Activity 15 of Listing Notice 3, which among other activity components, includes institutional use, should be applied for in relation to the zoning of the site as well as the geographical areas existing on site. The Department further advised that registered I&APs be duly informed of the inclusion of this activity and that the application form be amended to consider the inclusion of this additional activity. Refer to **Appendix E6** for the Comments and Responses Report.

Summary of response from the practitioner to the issues raised by the interested and affected parties (including the manner in which the public comments are incorporated or why they were not included) (A full response must be provided in the Comments and Response Report that must be attached to this report):

The response from the practitioner to the above issue is as follows:

Activity 15 of Listing Notice 3 has been included in the revised application for Environmental Authorisation (EA) submitted to the Department on **14 July 2022**. As per the Department's recommendation, the BA Report has also been revised and is made available for a 30-day public review and comment period from Thursday, **14 July 2022 – Monday, 15 August 2022** on the Savannah Environmental website - (<https://savannahsa.com/public-documents/other/>). Furthermore, a letter notifying registered I&APs of the inclusion of Activity 15 of Listing Notice 3 was distributed on **14 July 2022**.

### 2. IMPACTS THAT MAY RESULT FROM THE CONSTRUCTION AND OPERATIONAL PHASE

Briefly describe the methodology utilised in the rating of significance of impacts

Issues which required investigation during the BA process and the specialist consultants involved in the assessment of these impacts are indicated in **Table 1** below.

**Table 1:** Specialist studies undertaken as part of the BA process

Specialist Study	Specialist Company	Specialist Name	Appendix
Terrestrial Biodiversity Compliance Statement	The Biodiversity Company	Michael Schrenk	Appendix G1
Agricultural Compliance Statement	The Biodiversity Company	Michael Douglas	Appendix G2
Heritage Impact Assessment	Rebel Base Collection	Verdhant Maharaj	Appendix G3

Specialist studies considered direct and indirect environmental impacts associated with the development of all components of the facility. Identified impacts are assessed in terms of the following criteria:

- » The **nature**, a description of what causes the effect, what will be affected, and how it will be affected.
- » The **extent**, wherein it is indicated whether the impact will be local (limited to the immediate area or site of development), regional, national or international. score of between 1 and 5 is assigned as appropriate (with a score of 1 being low and a score of 5 being high).
- » The **duration**, wherein it is indicated whether:
  - \* The lifetime of the impact will be of a very short duration (0–1 years) – assigned a score of 1.
  - \* The lifetime of the impact will be of a short duration (2-5 years) - assigned a score of 2.
  - \* Medium-term (5–15 years) – assigned a score of 3.
  - \* Long-term (> 15 years) - assigned a score of 4.
  - \* Permanent - assigned a score of 5.
- » The **magnitude**, quantified on a scale from 0-10, where a score is assigned:
  - \* 0 is small and will have no effect on the environment.
  - \* 2 is minor and will not result in an impact on processes.
  - \* 4 is low and will cause a slight impact on processes.
  - \* 6 is moderate and will result in processes continuing but in a modified way.
  - \* 8 is high (processes are altered to the extent that they temporarily cease).
  - \* 10 is very high and results in complete destruction of patterns and permanent cessation of processes.
- » The **probability of occurrence**, which describes the likelihood of the impact actually occurring. Probability is estimated on a scale, and a score assigned:
  - \* 1–5, where 1 is very improbable (probably will not happen).
  - \* 2 is improbable (some possibility, but low likelihood.)
  - \* 3 is probable (distinct possibility).
  - \* 4 is highly probable (most likely).
  - \* 5 is definite (impact will occur regardless of any prevention measures).
- » The **significance**, which is determined through a synthesis of the characteristics described above (refer formula below) and can be assessed as low, medium or high.
- » The **status**, which is described as either positive, negative or neutral.
- » The degree to which the impact can be reversed.
- » The degree to which the impact may cause irreplaceable loss of resources.
- » The degree to which the impact can be mitigated.

The **significance** is determined by combining the criteria in the following formula:

$S = (E+D+M) P$ ; where

S = Significance weighting

E = Extent

D = Duration

M = Magnitude

P = Probability

The **significance weightings** for each potential impact are as follows:

- » **< 30 points:** Low (i.e. where this impact would not have a direct influence on the decision to develop in the area).

- » **30-60 points:** Medium (i.e. where the impact could influence the decision to develop in the area unless it is effectively mitigated).
- » **60 points:** High (i.e. where the impact must have an influence on the decision process to develop in the area).

As Country Club Johannesburg has the responsibility to avoid or minimise impacts and plan for their management (in terms of the requirements of NEMA and the 2014 EIA Regulations (GNR 326)), the mitigation of significant impacts is discussed. Assessment of impacts with mitigation is made, to demonstrate the effectiveness of the proposed mitigation measures. An EMPr that includes all the mitigation measures recommended by the specialists for the management of significant impacts is included as **Appendix H** to this BA Report.

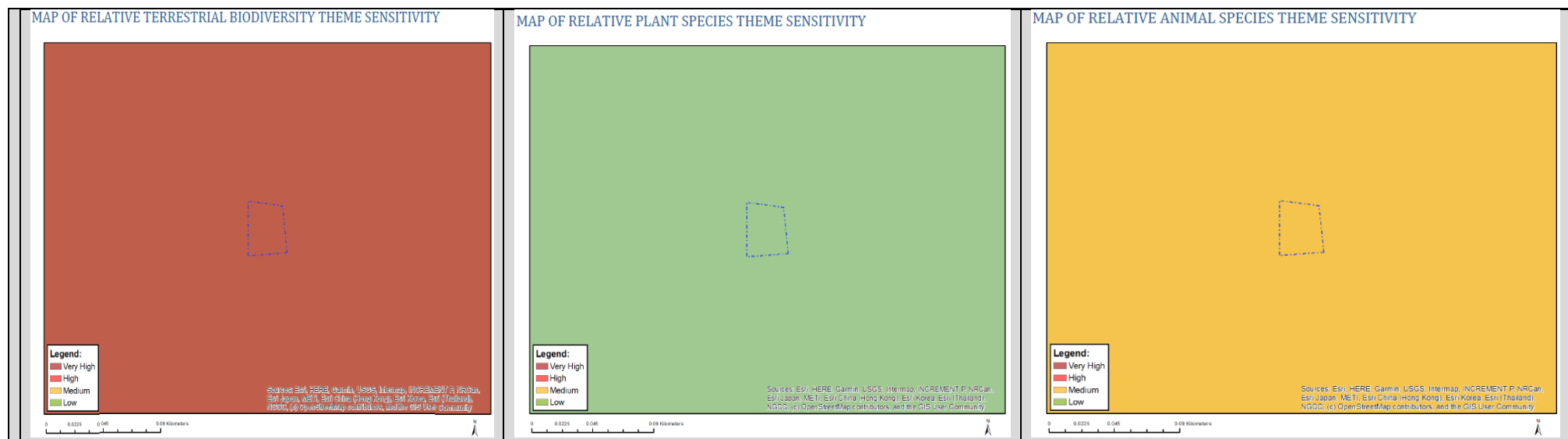
Briefly describe and compare the potential impacts (as appropriate), significance rating of impacts, proposed mitigation and significance rating of impacts after mitigation that are likely to occur as a result of the construction phase for the various alternatives of the proposed development. This must include an assessment of the significance of all impacts.

**CONSTRUCTION AND OPERATIONAL PHASE IMPACTS**

**Proposal**

Potential impacts:	Significance rating of impacts (positive or negative):	Proposed mitigation:	Significance rating of impacts after mitigation:	Risk of the impact and mitigation not being implemented
<b>Terrestrial Ecology</b>				
<p>The terrestrial biodiversity theme sensitivity as indicated in <b>Figure 7</b> was derived to be 'Very High, mainly due to the Ecological Support Area (ESA) status of the area and the fact that it lies within a critically endangered ecosystem. The completion of the terrestrial biodiversity desktop and field assessments disputes the 'Very High' sensitivity presented by the screening report as the project area is largely degraded and as such is assigned a sensitivity rating of 'Very Low' to 'Medium.' The screening report classified the animal species theme sensitivity as being of a 'Medium' sensitivity and the plant species theme as 'Low' sensitivity. Following the findings of the field survey, both the animal and plant species themes may be classified as having 'Medium' sensitivities. This is due to the presence of protected and flora species of conservation concern as well as the possible presence of fauna species of conservation concern such as the Hedgehog.</p> <p>Based on the sensitivity of the development footprint, a compliance statement was undertaken and not a full impact assessment in accordance with the relevant specialist protocols published in Government Notice 320 of 20 March 2020 and Government Notice 1150 of 30 October 2022.</p> <p>Since a Terrestrial Biodiversity Compliance Statement was prepared as per Government Notice 320 dated 20 March 2020, an assessment of the identified potential impacts was not undertaken. The following recommendations and mitigation actions have however been proposed by the specialist.</p>				





**Figure 7:** Results of the DFFE Screening Tool for the terrestrial biodiversity, plant species and animal species themes

**Proposed Mitigation**

- » High visibility flags must be placed near any protected or threatened plants (SCC) in order to avoid any damage or destruction of the species until the relevant permit is obtained for destruction or translocation (if destruction or relocation is necessary). All red-data plants that will be affected by the development should be relocated. Any individual protected plant that was observed needs a relocation or destruction permit for any individual that may be removed or destroyed as a result of the activities. Preferably, the plants should be relocated to an area that will not be impacted on by future activities.
- » Any planned activities should be realigned to prioritise development within very low/low sensitivity areas. Any activities or development within medium sensitivity areas must take precautions against disturbing faunal species.
- » Any indigenous woody material that is removed during construction can be shredded and used in conjunction with the topsoil to augment soil moisture and prevent erosion. Large wooded stumps or branches may be used to enhance the local habitat features and encourage herpetofauna.
- » Areas of dense and healthy indigenous vegetation, even secondary communities outside of the direct project footprint, should not be fragmented or disturbed further.
- » All activities must be restricted to within the very low to medium sensitivity areas. It is recommended that areas to be developed/disturbed be specifically demarcated so that during the construction/activity phase, only the demarcated areas be impacted upon.

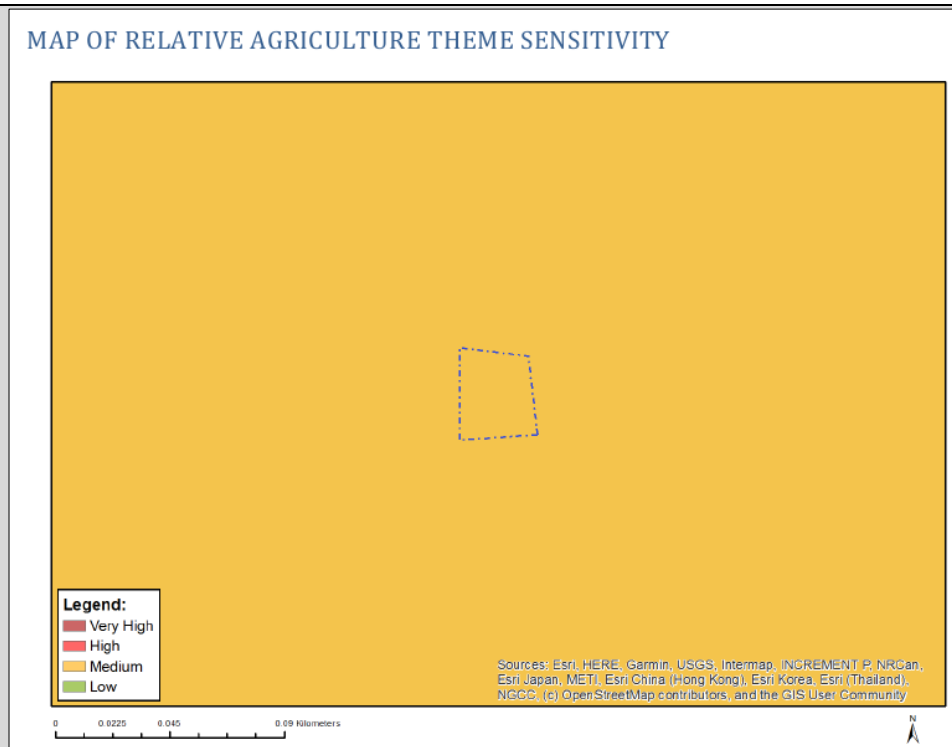
- » All vehicles and personnel must make use of the existing roads and walking paths, especially construction/operational vehicles.
- » All laydown, chemical toilets etc. should be restricted to very low/low sensitivity areas. Any materials may not be stored for extended periods of time and must be removed from the project area once the construction/closure phase has been concluded.
- » Areas that are denuded during construction need to be re-vegetated with indigenous vegetation to prevent erosion during flood events and strong winds and to support the adjacent habitat. This will also reduce the likelihood of encroachment by alien invasive plant species.
- » All disturbed areas are to be rehabilitated and appropriately landscaped. Rehabilitation of the disturbed areas existing in the project area must be made a priority. Topsoil must also be utilised, and any disturbed area must be re-vegetated with plant and grass species which are endemic to the project area vegetation type. Progressive rehabilitation of cleared areas will enable topsoil to be returned more rapidly, thus ensuring more recruitment from the existing seedbank.
- » A hydrocarbon spill management plan must be put in place to ensure that should there be any chemical spill out or over that it does not run into the surrounding areas.
- » The Contractor shall be in possession of an emergency spill kit that must always be complete and available on site.
- » Drip trays or any form of oil absorbent material must be placed underneath vehicles/machinery and equipment when not in use.
- » No servicing of equipment is to take place on site unless necessary.
- » All contaminated soil / yard stone shall be treated in situ or removed and be placed in containers.
- » It is important to appropriately contain any diesel storage tanks and/or machinery spills (e.g., accidental spills of hydrocarbons, oils, diesel etc.) in such a way as to prevent them leaking and entering the environment.
- » Leaking equipment and vehicles must be repaired immediately or be removed from project area to facilitate repair.
- » It should be made an offence for any staff to take/bring any plant species into/out of any portion of the project area. No plant species, whether indigenous or exotic, should be brought into/taken from the project area, to prevent the spread of exotic or invasive species or the illegal collection of plants.
- » A fire management plan needs to be compiled and implemented to restrict the impact that fire might have on remaining natural and newly rehabilitated areas. If a plan already exists then it must be made relevant to the new development and its proximity to natural areas.
- » Rocks removed during the construction phase may not be dumped but can be used in areas where erosion control needs to be performed. Alternatively, they may be piled to create useful habitat features for herpetofauna.
- » No trapping, killing, or poisoning of any wildlife is to be allowed. Signs stating that the trapping, killing, or poisoning of any wildlife is not allowed must be put up at the site.
- » A qualified environmental control officer must be on site when clearing begins. The area must be walked through prior to construction to ensure that no faunal species remain in the habitat and get killed. Should animals not move out of the area on their own relevant specialists must be contacted to advise on how the species can be relocated.
- » Any holes/deep excavations must be dug in a progressive manner in order to allow burrowing animals time to move off and to prevent trapping. Should the holes remain open overnight they must be covered temporarily to ensure no fauna species fall in.

- » Should any SCC fauna be observed within the project area before or during construction, all activities must cease immediately until the animal moves off. A relevant specialist must be consulted in order to facilitate the capture or removal of any animals that do not move off on their own.
- » The duration of the construction should be minimized to as short a term as possible, to reduce the period of disturbance on fauna.
- » Outside lighting should be designed and limited to minimize impacts on fauna. Fluorescent and mercury vapor lighting should be avoided, and sodium vapor (yellow) lights should be used wherever possible.
- » All construction and maintenance motor vehicle operators should undergo an environmental induction that includes instruction on the need to comply with speed limits and to respect all forms of wildlife. Speed limits must be enforced to ensure that road killings and erosion is limited. Additional Speed bumps should be built to force slow speeds.
- » Noise must be kept to a minimum during the evenings/ at night to minimize all possible disturbances to amphibian species and nocturnal mammals.
- » Schedule construction activities during the least sensitive periods, to avoid migration, nesting, and breeding seasons as far as possible.
- » Any significant heat generated from any source must be monitored to ensure that it does not negatively affect the local fauna.
- » Signs must be put up in order to show the importance and sensitivity of the surrounding areas and their functions.
- » The compilation and implementation of an alien vegetation management plan is very important, especially because of the invasive species identified on site which, if left unchecked, will continue to grow and spread prolifically leading to further and more significant deterioration to the health of the natural environment within the property area. The plan must especially pertain to any recently cleared and changed areas.
- » The footprint area of the construction should be kept to a minimum.
- » Waste management must be a priority and all waste must be collected and stored adequately. It is recommended that all waste be removed from site frequently to prevent rodents and pests from entering the site and proliferating.
- » A pest control plan must be put in place and implemented; it is imperative that poisons not be used.
- » Dust-reducing mitigation measures must be put in place and must be strictly adhered to, particularly for all dirt roads and any earth dumps. This includes the wetting of exposed soft soil surfaces and not conducting activities on windy days which will increase the likelihood of dust being generated. Only environmentally friendly suppressants may be used to avoid the pollution of water sources. Speed limits must be put in place to reduce erosion, and additional speed bumps should also be constructed.
- » Refuse bins must be emptied and secured and temporary storage of domestic waste shall be in covered waste skips. Maximum domestic waste storage period must be 10 days.
- » Any litter, spills, fuels, chemical and human waste in and around the project area must be removed and disposed of timeously and responsibly.
- » A minimum of one toilet must be provided per 10 persons. Portable toilets must be regularly pumped dry to ensure that the system does not degrade over time and spill into the surrounding area.
- » The Contractor should supply sealable and properly marked domestic waste collection bins and all solid waste collected shall be disposed of at a licensed disposal facility.
- » Under no circumstances may domestic waste be burned on site. Waste may never be stored in an open pit where it is susceptible to the elements such as wind and rain.

- » All personnel are to undergo Environmental Awareness Training. A signed register of attendance must be kept for proof. Discussions are required on all sensitive environmental receptors within the project area to inform contractors and site staff of the presence of protected flora and fauna, their identification, conservation status and importance, biology, habitat requirements and management requirements in line with the Environmental Authorisation and within the EMPr. Contractors and employees must especially be made aware of the potential faunal SCC present and the sensitive flora.
- » All staff should receive an Environmental Awareness programme which also covers the surrounding area. This programme must be used to inform of the importance of these areas and their conservation.

#### **Soils and Agricultural Potential**

The agricultural theme sensitivity as indicated in **Figure 8** was derived to be 'medium sensitivity'. Only two soil forms were identified within the 50 m regulated area, namely, Avalon and Glenrosa. The most sensitive of these soil forms, i.e., the Avalon soil form, which has been rated to be of 'Moderate' land capability sensitivity according to the DAFF national raster (2017), is characterised by a land potential of L5 (restricted potential) as a result of the poor climatic conditions. According to the DAFF national raster (2017), land capability sensitivities within the project area, including the 50 m regulated area, are rated to be "Moderately low to Moderate", which correlates with the findings of the baseline assessment.



**Figure 8:** Map of relative agriculture theme sensitivity

According to Section 3 of Government Notice 320 dated 20 March 2020: “Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation”, an applicant intending to undertake an activity on a site identified on the screening tool as being of “very high” or “high” sensitivity for agricultural resources must submit an Agro-Ecosystem Specialist Assessment unless:

1. The application is for a linear activity for which impacts on the agricultural resources are temporary and the land in the opinion of the soil specialist or agricultural specialist, based on the mitigation and remedial measures, can be returned to the current land capability within two years of completion of the construction phase;
2. The impact on agricultural resources is from an electricity pylon; or

3. Information gathered from the site sensitivity verification differs from the designation of “very high” or “high” agricultural sensitivity, and it is found to be of a “medium” or “low” sensitivity.

The project area is regarded as having a “Moderately low to Moderate” land capability and as such, an agricultural compliance statement has been prepared as opposed to a full impact assessment. Since an agricultural compliance statement was prepared as per Government Notice 320 dated 20 March 2020, an assessment of the identified potential impacts was not undertaken. The following recommendations and mitigation actions have however been proposed by the specialist.

**Proposed Mitigation:**

- » Based on the low sensitivity of the soil resources identified within the 50 m regulated area, no concernable loss of land capability is expected and no segregation of high production agricultural land will occur. As such, no mitigation measures have been proposed by the specialist.

**Heritage**

The archaeological and cultural heritage theme sensitivity as indicated in **Figure 9** was derived to be ‘very high sensitivity due to the location of the project area within 5km of a Grade I Heritage site.

According to the Heritage Impact Assessment, there is no significant heritage value to the property and the surrounds of the project area. The land was initially purchased in 1966 and has no heritage structures or signs of heritage landscape. The bulk construction of the proposed construction is planned to be undertaken on already developed land. The surrounding vegetation was planted as part of the complex and makes up a very small area of the total environmentally sensitive landscape.

All development of the property at the Country Club Johannesburg is less than 60 years of age and therefore holds no heritage value.



**Figure 9:** Map of relative archaeological and cultural heritage theme sensitivity

The findings of the survey of the project area dispute the 'very high' sensitivity rating ascribed to the project area by the screening tool given the absence of heritage features within the area, and the fact that the site has already been highly disturbed by development. Given the low sensitivity of the site from an archaeological and cultural heritage perspective, a full assessment of potential impacts on heritage resources was not undertaken by the specialist and no mitigation measures have been proposed for inclusion on the project's EMPr. The Heritage Impact Assessment states that the only mitigation measures required for the development would be environmental.

**Alternative 1** (REPEAT THIS TABLE FOR EACH ALTERNATIVE)

Potential impacts:	Significance rating of impacts (positive or negative):	Proposed mitigation:	Significance rating of impacts after mitigation:	Risk of the impact and mitigation not being implemented
N/A	N/A	N/A	N/A	N/A

**No Go**

Potential impacts:	Significance rating of impacts (positive or negative):	Proposed mitigation:	Significance rating of impacts after mitigation:	Risk of the impact and mitigation not being implemented
<p>The 'no-go' alternative is the continuation of the existing land use, i.e., maintain the status quo. Should this alternative be implemented, there would be no environmental impacts on the site or to the surrounding local area due to the expansion of sports and recreational facilities. All negative impacts related to the proposed activity will not materialise.</p> <p>The following impact is anticipated with the implementation of the 'do-nothing' alternative:</p> <ul style="list-style-type: none"> <li>» Failure to provide sufficient sports and recreational facilities for members of the Country Club Johannesburg.</li> </ul> <p>From the specialist studies undertaken, no environmental fatal flaws were identified to be associated with the proposed activity; especially given that the site has already been disturbed a golf course, parking areas, small buildings, and walking paths.</p> <p>If the project is not developed, the following positive impact will not be realised:</p> <ul style="list-style-type: none"> <li>» Job creation and skills development from the construction phase.</li> <li>» Meeting the needs of members of the Country Club Johannesburg.</li> <li>» Economic benefit to the province.</li> </ul>				

List any specialist reports that were used to fill in the above tables. Such reports are to be attached in the appropriate Appendix.

<ul style="list-style-type: none"> <li>» Terrestrial Biodiversity Compliance Statement.</li> <li>» Heritage Impact Assessment.</li> <li>» The Agricultural Compliance Statement.</li> </ul>
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Describe any gaps in knowledge or assumptions made in the assessment of the environment and the impacts associated with the proposed development.

<p>It is assumed that all information provided by the Applicant and the appointed specialists is correct and valid and all data from unpublished research is valid and accurate. The EAP will not accept any</p>
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responsibility in the event that additional information not reasonably foreseen at the time of this report comes to light at a later stage of the process.

### 3. IMPACTS THAT MAY RESULT FROM THE DECOMMISSIONING AND CLOSURE PHASE

**NOTE:** Decommissioning and closure will not be implemented as it is foreseen that the country club will operate indefinitely.

Briefly describe and compare the potential impacts (as appropriate), significance rating of impacts, proposed mitigation and significance rating of impacts after mitigation that are likely to occur as a result of the decommissioning and closure phase for the various alternatives of the proposed development. This must include an assessment of the significance of all impacts.

#### Proposal

Potential impacts:	Significance rating of impacts (positive or negative):	Proposed mitigation:	Significance rating of impacts after mitigation:	Risk of the impact and mitigation not being implemented
N/A	N/A	N/A	N/A	N/A

#### Alternative 1

Potential impacts:	Significance rating of impacts (positive or negative):	Proposed mitigation:	Significance rating of impacts after mitigation:	Risk of the impact and mitigation not being implemented
N/A	N/A	N/A	N/A	N/A

#### Alternative 2

Potential impacts:	Significance rating of impacts (positive or negative):	Proposed mitigation:	Significance rating of impacts after mitigation:	Risk of the impact and mitigation not being implemented
N/A	N/A	N/A	N/A	N/A

List any specialist reports that were used to fill in the above tables. Such reports are to be attached in the appropriate Appendix.

- » Terrestrial Biodiversity Compliance Statement.
- » Heritage Impact Assessment.
- » The Agricultural Compliance Statement.

Where applicable indicate the detailed financial provisions for rehabilitation, closure and ongoing post decommissioning management for the negative environmental impacts.

N/A

#### 4. CUMULATIVE IMPACTS

Describe potential impacts that, on their own may not be significant, but is significant when added to the impact of other activities or existing impacts in the environment. Substantiate response:

Cumulative impacts refer to the incremental impacts resulting from the implementation of an activity on a common resource which are added to the impacts of other past, present or reasonably foreseeable future activities.

Given the low – medium sensitivity of the site from a terrestrial ecology, soils, and heritage perspective, compliance statements were undertaken by the terrestrial ecology and soils specialists, and the heritage assessment did not include an assessment of potential impacts. Also given that the site is located within an area that is highly disturbed, and also given the small footprint of the activity, it is not anticipated that the project will result in any significant cumulative impacts.

#### 5. ENVIRONMENTAL IMPACT STATEMENT

Taking the assessment of potential impacts into account, please provide an environmental impact statement that sums up the impact that the proposal and its alternatives may have on the environment after the management and mitigation of impacts have been taken into account with specific reference to types of impact, duration of impacts, likelihood of potential impacts actually occurring and the significance of impacts.

##### Proposal

The footprint proposed for the development of the sports and recreational facilities proposed by the applicant was assessed by independent specialists as part of the BA process and their findings have informed the results of this BA Report.

The specialist findings have indicated that there are no identified environmental fatal flaws associated with the implementation of the project. Provincially protected plants species were identified within the project area, as well as provincially and nationally protected fauna species. The project area was found to comprise three habitats, namely, transformed habitat, critically modified grassland and modified grassland. The identified habitats are regarded to be on very low, low and medium site ecological importance.

The soils identified within the project area were found to have a moderately low to moderate land capability and Several depressions/pans, an Unchanneled Valley-Bottom wetland, and a Channelled Valley-Bottom Wetland (Sandspruit river) all occur within 1 km of the project area. According to the Heritage Impact Assessment, there is no significant heritage value to the property and the surrounds of the project area. The land was initially purchased in 1966 and has no heritage structures or signs of heritage landscape.

Through assessment of the project within the project area, it can be concluded that the project is environmentally acceptable (subject to implementation of the recommended mitigation measures).

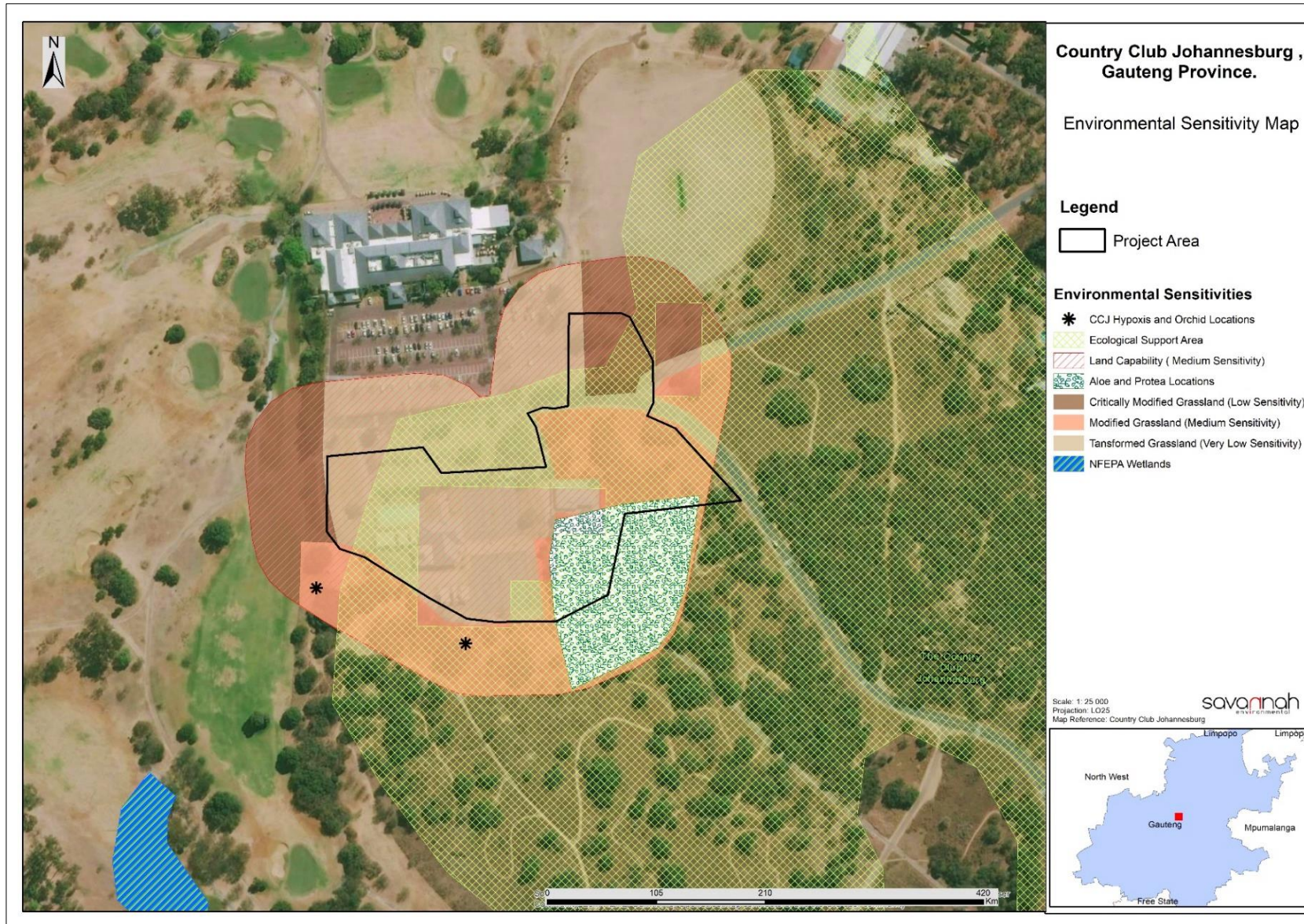
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**Alternative 1**



**Alternative 2**





**Figure 10:** Sensitivities identified within the project area and within 50m of the project area

### No-go (compulsory)

The 'no-go' alternative is the continuation of the existing land use, i.e., maintain the status quo. Should this alternative be implemented, there would be no environmental impacts on the site or to the surrounding local area due to the expansion of sports and recreational facilities. All negative impacts related to the proposed activity will not materialise.

The following impact is anticipated with the implementation of the 'do-nothing' alternative:

- » Failure to provide sufficient sports and recreational facilities for members of the Country Club Johannesburg.

From the specialist studies undertaken, no environmental fatal flaws were identified to be associated with the proposed activity; especially given that the site has already been disturbed a golf course, parking areas, small buildings, and walking paths.

If the project is not developed, the following positive impact will not be realised:

- » Job creation and skills development from the construction phase.
- » Meeting the needs of members of the Country Club Johannesburg.
- » Economic benefit to the province.

## 6. IMPACT SUMMARY OF THE PROPOSAL OR PREFERRED ALTERNATIVE

For proposal:

A compliance statement was undertaken and not a full impact assessment in accordance with the relevant specialist protocols published in GNR320 of 20 March 2020 from a soils and agricultural perspective as well as a terrestrial ecology perspective. No significant impacts were identified by the Heritage Impact Assessment that was undertaken as no heritage resources occur on the site.

For alternative:

N/A

Having assessed the significance of impacts of the proposal and alternative(s), please provide an overall summary and reasons for selecting the proposal or preferred alternative.

No alternatives have been assessed in this BA Report.

## 7. SPATIAL DEVELOPMENT TOOLS


Indicate the application of any spatial development tool protocols on the proposed development and the outcome thereof.

The SDF 2040 seeks to integrate all urban components of infrastructure, transport, housing, the environment and economic development to ensure targeted capital investment to achieve future development outcomes and targets. The investment in economic infrastructure will support and

safeguard the current economic mainstay of the city and ensure growth opportunities and job creation. The Country Club Johannesburg's proposal to expand their sports and recreational facilities will entail the construction of additional tennis courts and new padel courts; upgrading the existing building at the facility to include a gym, changerooms and squash courts; expanding the parking area; and upgrading the restaurant and bar to provide a modern, multi-sport and family facility for members of the Country Club Johannesburg. This project will therefore contribute to this vision as set out by the SDF 2040 by providing economic and employment opportunities to the local community. During the operational phase of the project, permanent employment opportunities will be provided which will ensure various growth opportunities.

**8. RECOMMENDATION OF THE PRACTITIONER**

Is the information contained in this report and the documentation attached hereto sufficient to make a decision in respect of the activity applied for (in the view of the Environmental Assessment Practitioner as bound by professional ethical standards and the code of conduct of EAPASA).

YES	
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If "NO", indicate the aspects that require further assessment before a decision can be made (list the aspects that require further assessment):

N/A
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If "YES", please list any recommended conditions, including mitigation measures that should be considered for inclusion in any authorisation that may be granted by the competent authority in respect of the application:

- » All mitigation measures must be adhered to as stipulated within the EMPr.
- » High visibility flags must be placed near any protected or threatened plants (Species of Conservation Concern) in order to avoid any damage or destruction of the species until the relevant permit is obtained for destruction or translocation (if destruction or relocation is necessary). All red-data plants that will be affected by the development should be relocated. Any individual protected plant that was observed needs a relocation or destruction permit for any individual that may be removed or destroyed as a result of the activities. Preferably, the plants should be relocated to an area that will not be impacted on by future activities.
- » It should be made an offence for any staff to take/bring any plant species into/out of any portion of the project area. No plant species, whether indigenous or exotic, should be brought into/taken from the project area, to prevent the spread of exotic or invasive species or the illegal collection of plants.
- » No trapping, killing, or poisoning of any wildlife is to be allowed. Signs stating that the trapping, killing, or poisoning of any wildlife is not allowed must be put up at the site.
- » Should any SCC fauna be observed within the project area before or during construction, all activities must cease immediately until the animal moves off. A relevant specialist must be consulted in order to facilitate the capture or removal of any animals that do not move off on their own.
- » The compilation and implementation of an alien vegetation management plan is very important, especially because of the invasive species identified on site which, if left unchecked, will continue to grow and spread prolifically leading to further and more significant deterioration to the health of the natural environment within the property area. The plan must especially pertain to any recently cleared and changed areas.

## 9. THE NEEDS AND DESIREBILITY OF THE PROPOSED DEVELOPMENT (AS PER NOTICE 792 OF 2012, OR THE UPDATED VERSION OF THIS GUIDELINE)

The DEA guideline on need and desirability (GN R891, 20 October 2017) notes that while addressing the growth of the national economy through the implementation of various national policies and strategies, it is also essential that these policies take cognisance of strategic concerns such as climate change, food security, as well as the sustainability in supply of natural resources and the status of our ecosystem services. Thus, the over-arching framework for considering the need and desirability of development in general is taken at the policy level through the identification and promotion of activities/industries/developments required by civil society as a whole. The DEA guideline further notes that at a project level (as part of a BA process), the need and desirability of the project should take into consideration the content of regional and local plans, frameworks and strategies.

In light of the above, this section aims to provide an overview of the need and desirability of the proposed project by highlighting how this project is aligned with the strategic context of national development policy and planning, broader societal needs and regional and local planning, as appropriate.

### **National Policy and Planning Framework**

This section aims to provide an overview of the regional and local policy and planning context relating to the proposed expansion of the sports and recreational facilities at the Country Club Johannesburg.

### **National Development Plan 2030**

The National Development Plan (NDP) 2030 provides the context for all growth in South Africa. The NDP provides a broad strategic framework, setting out an overarching approach to confronting poverty and inequality through the promotion of development, based on the six focused and interlinked priorities. One of the key priorities is "faster and more inclusive economic growth". In order to transform the economy and create sustainable expansion for job creation, an average economic growth exceeding 5% per annum is required. The NDP sets out that transforming the economy also requires changing patterns of ownership and control.

It is also acknowledged that environmental challenges are in conflict with some of these development initiatives. As such, it is emphasised that there is also a need to:

- » protect the natural environment;
- » enhance the resilience of people and the economy to climate change;
- » reduce carbon emissions in line with international commitments;
- » make significant strides toward becoming a zero-waste economy; and
- » reduce greenhouse gas emissions and improve energy efficiency.

### **New Growth Path**

The new Growth Path (NGP, 2011) reflects the commitment of Government to prioritise employment creation in all economic policies and sets out the key drivers and sectors for employment which will be the focus of Government. The sectors identified for prioritization include infrastructure, agriculture, mining, manufacturing, tourism and the green economy.

### **Regional and Local Policy and Planning Framework**

This section aims to provide an overview of the regional and local policy and planning context relating to the proposed development.

## **Gauteng**

The Gauteng Provincial Spatial Development Framework 2030 (PSDF) sets out the key spatial challenges faced by the Province and the proposed spatial policies, which have been formulated to address these challenges. As such, it supports the spatial development vision to achieve the Gauteng of 2030, an integrated, connected space that provides for the needs of all who are born in or drawn to the province. Economic growth is spread widely, beyond the core areas, to nodes and multi-modal activity corridors. To realise the spatial development vision, all developments in the province need to adhere to six spatial development principles: (i) liveability, (ii) concentration, (iii) connectivity, (iv) conservation, (v) diversity, and (vi) viability.

Four interrelated spatial development strategies are to be followed:

- » Capitalising on proximity, by directing higher densities closer to economic nodes and public transport networks, and improving conditions in areas closer to economic opportunities, to ensure even greater benefits for the people and economy of these areas.
- » Managing new settlement development, to prioritise infill development and densification, rather than expanding residential development outwards, so new settlements are functional and integrated units of the polycentric provincial network and based not only on the availability of land.
- » Building an economic network, through a system of high-order nodes and activity corridors, developing economic clusters that benefit from synergies and unlock the advantages of agglomeration.
- » Creating a viable and productive hinterland, by protecting valuable resources and high potential agricultural land from harmful development, and managing water resources fugally and effectively.

To realise the specific provincial spatial, economic and social objectives, two instruments are proposed: (i) spatial development coordination; and (ii) spatial targeting. These two instruments will be used to coordinate government action, target public investment and crowd in private sector investment to achieve a balanced, polycentric provincial spatial network/form.

### **Johannesburg Integrated Development Plan and Spatial Development Framework**

The Local Government: Municipal Systems Act, (Act 32 of 2000) stipulates that all Municipalities are required to prepare an Integrated Development Plan and that a Spatial Development Framework (SDF) be a component of the IDP. The Spatial Planning and Land Use Management Act (SPLUMA) provides a framework for spatial planning and land use management and Chapter 4 addresses the preparation requirements and content of an SDF.

The Johannesburg Metropolitan Municipality IDP (2020 to 2021) articulates that it is the task of the IDP to understand the various challenges that are faced by the city, and to ensure that a deliberate effort is made, in order to change the developmental trajectory of Johannesburg. Local government have a joint responsibility with the provincial and national government to transform and lead society. This implies that corrective and innovative policy making and implementation must be taken and the changes to it must be felt by the people it serves in the City. The IDP is a tool for pursuing a broader developmental paradigm shift which will enable the city to:

- » Deepen its understanding of how to intervene productively in the political economy of space and the political economy of services. Broaden participation in the economy at the value-sharing level by removing barriers to entry for all classes, races and genders of the City's population. Particularly the poor, and deconcentrating economic activity in ways compatible with the trade relations – person to person, firm to firm- that are the lifeblood of everyday prosperity flowing from the earliest civilizations.



The SDF 2040 forms an integral element of the IDP. The SDF seeks to address five major issues in Johannesburg's spatial and social landscape such as:

- » Increasing pressure on the natural environment and green infrastructure.
- » Urban sprawl and fragmentation
- » Spatial inequalities and job-housing mismatch.
  - Exclusion and disconnection emanating from:
  - High potential underused areas (the mining belt and the Modderfontein area).
- » Securitization and gated developments, and disconnected street networks (high cul-de-sac ratios and low intersection densities).
- » Inefficient residential densities and land use diversity.

The SDF for Johannesburg 2040 is a city-wide spatial policy document that identifies the main challenges and opportunities in the city, sets a spatial vision for the future city, and outlines a set of strategies to achieve that vision. The SDF also defines the strategic spatial areas to be used in the City's capital investment prioritization model which will ensure that infrastructure investment is directed to areas with the highest potential to positively impact on the development trajectory of the city. The core objective of the SDF is to create a spatially just world class African city.

The SDF 2040 seeks to integrate all urban components of infrastructure, transport, housing, the environment and economic development to ensure targeted capital investment to achieve future development outcomes and targets. The investment in economic infrastructure will support and safeguard the current economic mainstay of the city and ensure growth opportunities and job creation. The proposed development will therefore contribute to this vision as set out by the SDF 2040 by providing economic and employment opportunities to the local community during the construction and operational phases of the project.

#### **Need and Desirability of the Project**

Owing to the increase in people signing up to be members of the Country Club Johannesburg, there has been a strain on the current available facilities and as such, the need for additional facilities has been identified. The expansion of the sports and recreational facilities will ensure that sufficient facilities are available for members of the Country Club Johannesburg.

#### **10. THE PERIOD FOR WHICH THE ENVIRONMENTAL AUTHORISATION IS REQUIRED (CONSIDER WHEN THE ACTIVITY IS EXPECTED TO BE CONCLUDED)**

The period for which the Environmental Authorisation (EA) is required to remain valid is 10 years from the date of authorisation, with a period of 5 years for the design, planning, construction, and commissioning of the activity to be concluded.

#### **11. ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPR) (MUST INCLUDE POST CONSTRUCTION MONITORING REQUIREMENTS AND WHEN THESE WILL BE CONCLUDED.)**

If the EAP answers "Yes" to Point 7 above then an EMP is to be attached to this report as an Appendix

EMPr attached

YES

## **SECTION F: APPENDIXES**

The following appendixes must be attached as appropriate (this list is inclusive, but not exhaustive):

It is required that if more than one item is enclosed that a table of contents is included in the appendix

Appendix A: Site plan(s) – *(must include a scaled layout plan of the proposed activities overlain on the site sensitivities indicating areas to be avoided including buffers)*

Appendix B: Photographs

Appendix C: Facility illustration(s)

Appendix D: Route position information

Appendix E: Public participation information

Appendix F: Water use license(s) authorisation, SAHRA information, service letters from municipalities, water supply information

Appendix G: Specialist reports

Appendix H: EMPr

Appendix I: Other information

## **CHECKLIST**

To ensure that all information that the Department needs to be able to process this application, please check that:

- 1) Where requested, supporting documentation has been attached; and
- 2) All relevant sections of the form have been completed.