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Attention: Karthigesan Govender
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Dear Sir

COMMENTS-BAR: PROPOSED REHABILITATION AND UPGRADE OF THE SEDER STREET BRIDGE IN RANDPARK RIDGE, GAUTENG PROVINCE.

The Draft Basic Assessment Report (BAR) regarding the above-mentioned development received by this Department on 10 March 2020 has reference.

The proposal entails rehabilitation and upgrade of the bridge infrastructure on the above-mentioned site. The proposed work is outlined on a table format in page 8, section 1.3.2. The draft report for the proposed activities in relation to the work to be done is outlined also in section 1.4, referred to as table 2.

This Department would like to comment as follows:

A. Alignment of the activities with applicable legislations and policies

The Gauteng Provincial Environmental Management Framework, 2015 (GPEMF, 2015) identifies the site as Environmental Management Zone 2, dominated by high control zone within urban development activities. The zone highlight sensitive and conservation types of activities that can be allowed in this zone and related tourism and recreation type. The final report must discuss the proposed activities in relation to the GPEMF (2015) zone.

B. GDARD Guidelines and Requirements

The Department's Conservation Plan Version 3.3 depicts sensitive Ecological Support Area, River and a Wetland on the proposed site. Specialist studies have been conducted and attached to the draft report. The wetland/riparian delineation concluded that the water course on site is a valley bottom wetland and there is no true riparian habitat. The specialist further suggested that the hydrology of the area can be improved by including suitable attenuation structures as part of the bridge design and installing of litter traps. This will improve water pollution downstream of the bridge. Mitigation, rehabilitation, and monitoring plans have been attached as Appendix G1 (i). What the report didn't



highlight, is the plant species that will be used for revegetation which must be indigenous to the area (or historical indigenous to the area).

C. Heritage resource

The submission that the proposed activities might not likely impact on the heritage resources of the area is noted and that no further heritage studies will be required. However, isn't this the call that must be made by South African Heritage Resource Agency (SAHRA)? Therefore, SAHRA must issue such comments.

D. Public Participation Process

The registered interested and affected parties raised concern on the Hymany Dam, that attenuation structure downstream is required to combat peak floods and alleviate peak hydraulic load. The City of Johannesburg Metropolitan Municipality's environmental section must provide comments on the application to form part of the final report.

E. Environmental Management Programme (EMPr)

The EMPr must incorporate issues raised in this letter as well as issues raised by registered interested and affected parties.

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

Yours faithfully



Mr. S. Mukhola

Director: Impact Management

Date: 19/5/2020