



## AGRICULTURE, CONSERVATION, AND ENVIRONMENT

Diamond Corner Building, 65 Eloff & Market Street, Johannesburg  
P O Box 8769, Johannesburg, 2000

Telephone: (011) 355-1900

Fax: (011) 337-2292

Email: [gdace@gg.gov.za](mailto:gdace@gg.gov.za)

**Reference:** Gaut 002/04-05/509  
**Enquiries:** Samantha Braid  
**Telephone:** (012) 355-1566  
**Email address:** [Samantha.Braid@gauteng.gov.za](mailto:Samantha.Braid@gauteng.gov.za)

Bokamoso Landscape Architects  
P O Box 11375  
Maroelana  
0161

**Attn:** Lizelle Gregory  
**Fax:** (012) 348-2365  
**Tel:** (012) 348-1914

### BY FACSIMILE / MAIL

Dear Sir/Madam

### RE: SCOPING REPORT FOR THE PROPOSED ROAD 2382 BETWEEN ROAD K54 AND K220

Your scoping report dated 22 February 2005 concerning the above-mentioned matter is hereby referred to.

Please be advised that this Department has reviewed the Scoping Report and has the following comments:

- a) The study however does not consider all aspects of the development and does not take the sensitivity of the ecological elements found on site adequately into consideration.
- b) The sensitivity assessments are deemed inadequate, and their recommendations found to be contradictory.
- c) Some public participation information is outstanding.
- d) The development proposal has not been shown to be compliant with the objectives and requirements of relevant government legislation, policies and guidelines, including:
  - o the Environment Conservation Act (Act 73 of 1989)
  - o section 2 of the National Environmental Management Act (Act 107 of 1998)
  - o the Gauteng Development Guideline for Ridges
  - o the Gauteng Red Data Plant Policy for Environmental Impact Evaluations
  - o the Gauteng Spatial Development Framework and the Development Facilitation Act (Act 65 of 1995).

Based on the above and on the information currently available, the Department is of the opinion that the scoping report did not adequately cover all the issues related to the proposed development, and

that it should be revised and resubmitted for review in order for the Department to make an informed decision. The following issues require assessment/consideration in the revised submission:

1. Project conception:
  - 1.1. The area surrounding the proposed road is rural residential in character with many agricultural holdings. The area also falls outside of the urban edge. Comment must therefore be provided on the appropriateness of the widening of the road opposed to just the upgrade of the road, given the rural/agricultural setting.
  - 1.2. Alternative routes must be considered, including alternatives proposed by the Interested and Affected parties. The alternatives must take into consideration the environmental impacts as well as social and economic implications such as relocation of families and existing businesses.
2. Public Participation:
  - 2.1. The report is unclear regarding the involvement of the City of Tshwane Metropolitan Municipality. Although the proposed road does not run through their area of jurisdiction, it does eventually intersect with the K54 and thereby affect the flow of traffic on this road. The road will have an impact into their area of jurisdiction.
  - 2.2. The comments made by the Interested and Affected parties during the public consultation process are not adequately addressed.
  - 2.3. The Interested and Affected Parties have requested a follow up public meeting to receive feedback on their comments and objections. It has been brought to this Department's attention that this meeting has currently not been availed to them (I&APs) and therefore their comments and objections are still valid.
3. Sensitivity analyses:
  - 3.1. No red data butterfly or invertebrate survey was included in the report.
  - 3.2. The Grass owl report must be re-assessed after the rainy season.
  - 3.3. Although the Bullfrogs are found in the pan within the Rietvlei Dam Nature Reserve, the report does not take into account the migratory route of the reptiles to the pan from other wetlands.
  - 3.4. The area of the proposed road is underlain by dolomite, with known sinkholes in the area. The report makes mention, in detail, about the dolomite aquifer but the report does not include a geotechnical report.
  - 3.5. All sensitivity surveys and analyses must be conducted in consultation with the Gauteng Directorate of Nature Conservation.
  - 3.6. The flowers, *Asclepias fallax* and *Asclepias eminens* are identified in the scoping report, however the significance of these plants in the area is not discussed in reference to the proposed road.
  - 3.7. Discussion must be provided in the report regarding the relevance and impact of the Department's ridges policy on the proposed road and its route.
4. Impact assessment:
  - 4.1. The report state that there will be some impact to the wetland, but does not explain the impacts of Sesmylspruit area, that the road would also cross.
  - 4.2. A copy of precautionary measures for construction on dolomite has been included as an annexure in the report. However, some of the precautionary measures are not well advised for the proposed road. For example, termite poisoning around all structures will lead to contamination of the groundwater and highly protected aquifer.

- 4.3. There will be impacts from the stormwater runoff but no detailed stormwater management plan is provided in the report, outlining what mitigation will be put in place to prevent contamination of the aquifer.
- 4.4. Impacts on the groundwater have not been adequately addressed. For example, what are possible impacts of the construction of the road to the groundwater, how will this affect Nestle Mineral Water and quality of the water, and what will be done to mitigate against these possible impacts? Bearing in mind that this requires proactive planning, not reactive mitigatory measures.
- 4.5. The proposed road will cross a wetland and the Sesmylspruit, however the report states that no major structures will be constructed. In order to cross both the wetland and the spruit, a detailed design of the single span bridges will need to be submitted with the report.
- 4.6. The report states that access to properties will be impacted during operation and construction of the proposed road. Detail must be provided as to how this will be accommodated and planned.
- 4.7. Confirmation that no caves exist within a 500metre buffer of the proposed road, must be provided. If they do exist, a site visit must be organised with the Directorate of Conservation.
- 4.8. "If not planned and managed properly..." Is not an impact or mitigation measure. What are the specific possible impacts and what are the specific possible mitigation measures for the planning and management of the construction and operation of the road?
- 4.9. Please provide an emergency management plan for a toxic (oil, petrol, diesel or any other hazardous substance) spill on the road to prevent environmental contamination.

It must also be noted that, the report makes mention of the proposed road 2383. Although this report does feature the road in its assessment, the road 2383 will require separate authorisation and specialist studies.

The processing period, by this Department for this project will be a further 60 to 90 days commencing upon receipt of the **re-submitted scoping report**.

The Department further wishes to alert the proponent to the fact that site preparation, including site pegging prior to authorisation from this Department is in contravention of section 22(1) of the Environment Conservation Act (Act 73 of 1989) and this Department therefore reserves the right to take further action in this regard.

Yours faithfully



Gerard van Weele

Acting Deputy Director

Environmental Planning and Impact Assessment: (Tshwane & Metsweding)

Date: 13/12/2005

CC: Gautrans

Attn: Mr. CC Buitendag  
Tel: (011) 355-7070  
Fax: (011) 355-7099

City of Tshwane Metropolitan Municipality

Attn: Madeline Oosthuizen  
Tel: (012) 358-8731  
Fax: (012) 358-8934