

Objections from Residents.

We have a number of concerns regarding the proposed development on portions 7, 36-38 & 121 of the Farm Diepsloot 288 JR which I refer to as River Sands in the body of the email below. There are glaring omissions in the process followed with the Phase 1 proposal which I will start with and then list the issues we have with phase 2.

For the record we are totally oppose to the development in it's current format for phase 1 and phase 2 in the proposed location.

Phase 1 issues are listed below.

- 1) Phase 1 public notice was only published in die Beeld Newspaper during the December 2012- January 2013 school holidays, (Die Beeld is an afrikaans newspaper which is not widely read by residence of the area as most are English speaking.
- 2) Phase 1 public notice was posted on two 100 km speed limit sign posts on the R511 which is on the western boundary of Riversands. Most residents who are affected by the development commute on the eastern side of Riversands as most of the agricultural, farming equine and a variety of outdoor activities groups, residential communities and schools directly impacted by the development are on the eastern side of Riversands and therefore did not see the sign posts and did not register as interested or affected parties.
- 3) Phase 1, public notice, registration of affected and interested parties was only open for a period of 15 days which expired towards the end of January (This period was too short given that many people were still away on holiday as most schools in the community only opened mid January)
- 4) **Phase 1 development was announced by the Premier of Gauteng on the 25th Feb, 3 days after the comment period expired.** This is a clear indication that none of the adjacent communities concerns were being taken seriously. The phase 1 public notice was for an ROD amendment. There is still a whole process that needs to be followed before approval for this kind of development can go ahead.
- 5) Phase 1 study area in the public notice was much smaller than what is shown as approved in the detailed plan now available in the phase 2 proposal. Please see public notice 1 and phase 2 BID for details of discrepancy. The comment I received from Bokamoso (ROD amendment Environmental Consultants) regarding this is that only the highlighted area in the first public notice was the areas that would change

and that the initial ROD already made provision for the remainder of phase 1 approval.

6) Phase 1 was approved (date of approval is unknown) through a simple amendment of the Environmental Authorisation without any feedback of the concerns raised back to the communities that it directly impacts.

7) A change in zoning of this nature should require a new Environmental Authorisation to be completed as the impact of such a development is fundamentally different to the original environmental Authorisation.

8) As neighbours and community members who are directly impacted by such a development, we had not been given any sort of detailed documentation surrounding the development until Friday 30th August (Albeit still in too low resolution to read any detail) This was requested at the public participation meeting on the 26th of June and then subsequently directly from Mark Corbett (CEO of Century Property Development), Urban Dynamics and the Riversands Development project manager.

9) The North South Road clearing of area and removal of trees along the river which was identified as a floristic sensitive area in the original Environmental Authorisation started around the 15th June. At no time was the size, purpose, position and impact of the North South Road ever discussed at the public participation meeting or made publically known.

10) No evidence has ever been provided of a completed study of the impact of the North South Road. At the public participation meeting on the 26 June and again in subsequent telephonic conversations with Urban Dynamics, it was highlighted by Urban Dynamics that the north south road would be a private internal road. Bokamoso once again replied to concerns raised around the process followed to amend the alignment and intended use of the road by merely stating and I quote, *“On the issue of a road, a north-south link road was approved in the original ROD. The amendment sought to align it with the 'new' rights but its alignment predominately follows what was approved in the original ROD. In terms of the new Regulations, a road such as this one (even if not previously considered) will not, in all probability, require an EIA.”*

11) Please note that the intended use of the north south road was never intended as a high traffic volume, heavy vehicle through road. Consideration of the environmental impact and traffic impact of such an intended road must be considered and logically cannot be approved until such a study is complete.

12) Of particular concern at the public participation meeting were the vagaries around the details of the development and the lack of transparency around the future plan for Century Property's entire plan for phase 1, phase 2 and the adjoining property which they had recently acquired lying to the east of Riversands. Issues raised were:

- a. Lack of detail regarding the proposed town plan
- b. No information pertaining to the north south road and services infrastructure plan
- c. Lack of detail in the Environmental Authorisation Amendment
- d. No detailed plan of the aesthetics of the entire development. The visual impact of such a development if compared to Long Meadow is severe and made even worse in that the area is very hilly and surrounded by ridges that are occupied by residential homes, schools and farm steads
- e. A massive increase in noise, light and air pollution from industrial activity and traffic activity in the area which is surrounded by ridges and is currently home to a farm, 3 schools and around 350 residential agricultural holdings most of whom own horses and other livestock.
- f. Issues raised in the 2nd public participation meeting hosted by Urban dynamics were never made public, although a commitment was made to make all comments raised available for public viewing. To date we have no idea what was submitted to council.
- g. Responses to the issues raised were not made available to the people at the public participation meeting or to the impacted community at large.
- h. It was also noted during the public participation meeting on the 26th June that the road constructions had already started (No mention of the details of the road was made available to the people at the public participation meeting. Initially it was thought that the road was going to be a private road internal road)

13) In early August, when we requested the construction permission and approval from Jordan Construction who was contracted by Century Property Development to build the road, none was available at the site office (Jordan Construction officially started on site on the 15 July). They indicated that this had been minuted at their weekly meeting with Century Property Development.

14) The City of Johannesburg adjudicated on the development proposal for phase 1 on the 16th August. Their recommendations on the development are yet to be made official yet the road clearing started around the 15th June and clearing and levelling of ground for the proposed development in phase 1 started around the week of the 5th August. According to the city of Johannesburg, no building permissions had yet been granted.

Below is a list of Access Roads and Phase 2 issues.

Please note that there are some factual discrepancies in the Phase 2 amendment bid document issued by Bokamoso Environmental Consultants

- 1) The proposed plan in 2009 for River Sands Country estate never included any light industrial development. The zoning for a small portion was for business and commercial and light industry but was never sold to the community on the pretext that it would ever be used for light industry or high density housing
- 2) The site for phase 2 is not bordering the R511 it is bordering a school, residential and agricultural land.
- 3) The surrounding properties are being used for large scale chicken farming, cattle and sheep farming, schooling from Preschool to high school and a riding school for the disabled, residential agricultural mainly for the purpose of equine sports and recreation.
- 4) One thing that the BID document fails to mention is the current agreement with Inanda Country club on the sale of Inanda Fields which adjoins the eastern boundary of phase 2. Lifelong access rights were given to Inanda Country Club to make use of both sides of the riverine areas (Wetland and river areas) as bridle paths and to build two polo fields with certain rights in the phase 4 section of the Riversands development. This deal was concluded in the middle of 2012. At the stage of concluding the deal was there no mention of an industrial development with the aim of including the newly acquired property as part of the development.
- 5) Red dot species existed and possibly still exist on the property prior to and subsequent to Century Property concluding the sales agreement with the previous land owner in 2009. If enough time was afforded to the environmentalists, evidence can be provided to prove Bokamosa's findings incorrect.
- 6) It is factually incorrect that no additional footprint or greenfield areas will be affected by the proposed development. The proposed development will set a precedent to change the zoning of the current green fields areas to light industrial, business and commercial. Evidence of this is clear. Phase 1 zoning policy change has already been approved from mixed use residential to predominantly light industrial. Within months a phase 2 amendment has been proposed to change residential to light industrial. The adjoining property to the east recently acquired by Century Property is currently agricultural and following the trend being set by Century Property in phase 1 and phase 2 will also become light industrial. There is further evidence of this intention by the 5 proposed access roads from the proposed phase 2 light industrial site to the adjoining agricultural zoned property to the east.

Issues relating to access to the Riversands Industrial development and the impact on surrounding areas traffic patterns are listed below

- a. No evidence of any sort of study has made available of the impact and extent of the road network to facilitate a very large volume of traffic and size of vehicles that will need to access the proposed development.
- b. The already congested R511 into and out of Fourways even once upgrades are complete may just be sufficient for the increase in traffic accessing Steyn City. No provision has been made for the Riversands development which may see anything up to and beyond 6000 extra cars and trucks on the surrounding roads during peak hours. Remembering that this kind of development lends itself to 24 hour operations so the traffic volumes will be high and sustained. Residential developments on access routes will be directly impacted by the increase in noise and air pollution.
- c. The other access routes from the North along the R511 past Diepsloot and the east along Mnandy Road are narrow single laned roads without any emergency lanes. These roads were never designed to carry such large vehicles and volume of traffic. No provision has been made on these roads to access the proposed Riversands light industry development.
- d. There will be a dramatic increase Road traffic volumes, entering and exiting all feeder roads as a result of the proposed development and absorption of much of the R511 traffic until the R511 is upgraded between Earling Road and Diepsloot.
- e. No study has been completed on the increase in air pollution and noise pollution through use of air brakes on the R511 and Mnandy road which both access the proposed development on long down hills.
- f. No provision has been made to ensure the safety of existing motorists and pedestrians accessing Riversands primary school Shumba Shaba riding school for the disabled which both boarder the North South Road at the Mnandy road intersection, including the safety of motorists and school children accessing Summit college along Earling road and the American International School motorists and school children entering and exiting at the Mnandy Road, Scorpion Trail intersection.
- g. No study has been conducted or risks and issues mitigated on the change in traffic flows from a low peak hour traffic flow to constant 24 hour traffic flow given that large logistics companies and retail companies like Makro and Ferras, to name a few that have been earmarked as tenants of the development.

h. No study has been conducted on the impact on red data species that reside in the area due to disturbance of natural habitat and hindrance movement along the river banks to breeding areas east and west of the development.

i. No study has been done or risks and issues have been mitigated on the taxi and public transport parking or turning facilities. Residents along Earling road and Mnandy road and Steyn city will be directly impacted by this if the other industrial nodes are to be used as case studies.

j. No environmental or health and safety considerations have been made for the very large volumes of storm water runoff that the proposed development and new roads will produce and the safety of the equestrian community making use of the riverine and wetland areas as bridle trails

1) Further clarity and additional questions arising from the phase 2 bid document. The following statement is unclear *“Further, this amendment seeks to remove an ambiguity created in the current Environmental Authorisation. The EA provides three conditions- 1.12, 1.13 & 1.14 relating to the protection of the wetland and related vegetation. Conditions 1.13 and 1.14 prohibit development within the 1:100year floodline as well as within a 30 metre buffer. It is provided that this condition must also apply to the riverine area and, in combination within 1.13 is adequate to protect the water resources on site as this is standard practice in situations as this one.”*

2) If this means removing the 30 meter buffer zone. Then we are opposed to it changing this.

3) Please provide information on the conditions 1.12, 1.13, 1.14 of the EA so that we are informed.

In Summary

We are not opposed to the establishment of a training facility as long as consideration is made for traffic management, noise and air pollution, storm water management, and keeping within what the adjoining community has preserved for many years prior to the arrival of Century Property Developments. When Mark Corbit of Century Property Development was recently interviewed by 50/50 he was asked if the training facility could exist without the industrial development, he said yes.

I am opposed to the establishment of an industrial estate on Riversands due to the factors listed above.

If such an Industrial estate is necessary to drive economic development in the Province for the under privileged Diepsloot community there are alternatives available namely the properties adjacent to the Diepsloot community, directly to the east and to the South. The property to the east makes more sense as it has direct access to the N14 highway. If other large industrial estates are to be used as case studies then the principals of easy access and environmental impact must surely be applied.

Why must the wheels be set in motion to destroy the hart of an entire equine industry and green area in Gauteng to make way for light industry that can be accommodated on government owned land just a mere 1.5 km away in an area that is far better suited to satisfying the needs of an impoverished Diepsloot and will ultimately result in less money being spent on infrastructure to access and sustain such a development?

This project is being primarily funded by the Gauteng Province and processes and procedures are being amended to expedite the development. Not enough thought is being applied to the ultimate impact of such a development taking place in the wrong place.

Regards,
Jason du Toit