

Dear Gwen Theron

I would like to lodge the comments of the Greater Kyalami Conservancy (GEKCO) on the Basic Assessment Report for the Blue Hills X74.

The report dismisses the likelihood of the occurrence of Grass Owls in the vicinity and suggests that they may have been mistaken for Marsh Owls. Both Grass Owls and Marsh Owls are present on neighbouring sites. Matt Pretorius of EWT can be contacted for confirmation of this. They have been seen hunting on this site and residents confirm this.

The Conservancy would like to request a meeting with the appointed specialist to discuss this and the studies done with Grass Owls on Midstream Estate. We have been in contact with Geoff Lockwood who has developed a strategy with GDARD for the protection of grass owls which could be instituted in our area. The findings from the Midstream development indicated that the area required to sustain Grass Owls was much larger than the area managed specifically for them through the required buffer zone.

There is no sewage infrastructure to support the proposed development. This would require a new pipe to be laid through the conservancy to the Northern Sewage Works which is already very stressed evident by the frequent spilling into the Jukskei River. These pipes would likely be laid in or adjacent to wetlands which will not only damage the wetlands but has potential for further pollution. This would require additional municipal infrastructure in an area that is not densely populated and is not in line with city policy to curb urban sprawl.

The development proposes an auto workshop. This is a sensitive hydrological area and spillage of oil and petrol will contaminate ground water and nearby wetlands. The soils in this area are coarse and gravelly and water moves laterally through the soil. A study has recently been completed by John van der Walls of Terra Soil which highlights the sensitivity of this soil and the movement of water towards the wetlands. This should be incorporated into the report.

The need of this development is not identified as this is a low density residential, agricultural area.

The development would have a negative impact on the ability of the area to support equestrian use. 50% of residents in the area either ride or own horses and this supports equestrian related businesses throughout South Africa.

The development would have a knock on effect of further development resulting in the loss of a valuable, irreplaceable environmental area which not only supports a variety of wildlife including red data flora and fauna but is a functioning biodiversity corridor linking the Rietfontein Nature reserve with the Magaliesburg. Work is currently being done to identify and study these corridors as a unique opportunity exists for urban conservation. This must be mentioned and examined in the BA report.

Our electrical supply is in crisis with more demand than available supply. This would put more stress on our electrical supply and could lead to black outs. Developments in our country should serve the need of our country which is to provide housing and infrastructure in areas that need it the most. Developments of this nature are purely commercial driven and are putting the environmental health of our country in peril.

This study appears to be a very brief overview of the site without a thorough investigation of the surrounding area and the effect this development will have. Details brought up by the I&AP's such as the Grass Owls require further investigation and alternatives to be considered.

Kind regards

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