



## **INTRODUCTION**

The Greater Kyalami Conservancy (**The Conservancy**) would like to submit its comments in respect of the proposed Crowthorne Bulk Outfall Sewer (GAUT: 002/13-14/E0020) (**the proposed activity**) to service the proposed Retail Africa Commercial / Retail site and proposed densification in the Crowthorne area.

The structure of this submission will, as far as possible follow the layout of the Basic Assessment Report (**BAR**).

## **SECTION A – DESCRIPTION OF RECEIVING ENVIRONMENT**

### **APPLICABLE LEGISLATION, POLICIES AND/OR GUIDELINES**

In terms of section 11 of the National Environmental Management Act, 107 of 1998 (**NEMA**) every national department listed in Schedule 2 (which includes the Department of Environmental Affairs and Tourism) and which exercises functions involving the management of the environment must prepare an environmental management plan. Furthermore, section 16 of NEMA provides that every organ of state must exercise every function it may have that may significantly affect the protection of the environment in terms of the environmental implementation or management plan.

Regulation 17 of the EIA Regulations (contained in GN R543 of 18 June 2010) the Environmental Assessment Practitioner (**EAP**) must comply with NEMA and the EIA Regulations and any guidelines that have relevance to the proposed activity.

During 2013 the Regional Environmental Management Framework for South Western Tshwane and North Western Johannesburg, Volume III: Strategic Environmental Management Plan (**EMF**) was Gazetted and as, such, came into full force and effect.

The Conservancy, in general, has been identified as a wetland rich environment and according to the EMF for the area the area is identified as a medium development constraint zone. More specifically, the EMF identifies the Beaulieu Bird Sanctuary as a Very High Development Constraint Zone.

The Management Guidelines of the EMF provides in relation to Conservancies that: only low impact development, conducive to the aims of the conservancies and responsible agriculture are allowed within conservancies; if listed activities (in terms of the National Environmental Management Act) are considered, it must be subject to a full Environmental Impact Assessment and Environmental Management Plan; limited commercial, business and community



activities allowed that are in support of the conservation areas; educate landowners on the ecological importance of their land and educate them on good veld management and continuous monitoring in order to sustain healthy ecosystems; support landowners in implementing alien invasive eradication and monitoring programmes to remove current infestations as well as safeguard this zone from further invasion; regular monitoring and reporting of the ecological state of conservancies as well as the persistence of species that are of conservation concern.

Furthermore, the EMF provides that all wetlands and rivers that are linked to the Conservancy must be considered as important ecological corridors for the dispersal of sensitive faunal species. The EMF also provides that all assessments regarding rivers should be conducted by a Professional Natural Scientist registered in accordance with the Natural Scientific Professions Act, 27 of 2003 in the field of Ecology / Zoology with applicable experience in aquatic ecosystems who is also a DWAF accredited SASS5 practitioner with relevant experience in applying the EcoStatus model. SASS thresholds as provided in Smith-Adao *et al* (2006) should be used to guide the defining of management requirements within the study area. Where a perennial zone has been delineated, no development should be allowed within a minimum of 100m of the edge of the riparian zone outside the urban edge. Riparian buffer zones should be maintained in their natural state. Where riparian buffer zones are not in their natural state, rehabilitation measures should be implemented. This should also be read in line with the principles of NEMA, which provides that “*Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure*”.

The following activities within the Conservancy are supported by the EMF: natural open space with pedestrian trails, sustainable community agriculture on transformed areas; low density residential or low impact developments; environmentally responsible farming activities as well as game farms; and fallow land to return to natural state where feasible and possible.

**Comment:** in terms of the EMF and considering that the proposed activity falls within the Conservancy and the Beaulieu Bird Sanctuary the proposed activity is required to be subjected to a full Environmental Impact Assessment and not a BAR assessment.



## **ALTERNATIVES**

**Comment:** the first alternative that is considered, will raise the same concerns and issues as the proposed activity, it merely allows for a different route for the proposed activity. The alternative proposed will still fall within the Conservancy, wetland systems and the Beaulieu Bird Sanctuary.

The 2<sup>nd</sup> alternative is to not install the Bulk Outfall Sewer System and rather provide an individual sewer collection facility on the site of the proposed activity. This alternative is not detailed and it appears that no actual assessment or investigation has been conducted.

There are additional positive outcomes, which are not listed in the BAR in respect of the 2<sup>nd</sup> alternative such as:

1. Preservation of current employment in the equine and related industries.
2. Opportunity for carbon sequestration within a stressed urban environment
3. Protection of open space to meet climate change objectives
4. Opportunities exist for alternatives to densification in the area, such as sustainable low impact, low density residential development; food security initiatives; environmental education and biodiversity rehabilitation and protection.
5. Not building the sewage line would reduce the load on already stressed municipal entities
6. Reduces the load on already stressed Sewage Treatment Plants
7. Diversion of finance to develop areas without adequate sewage and infrastructure such as Diepsloot.
8. Creation of green jobs such as eco-tourism, urban food production, biodiversity and wetland studies and rehabilitation

There are no other alternatives suggested.

Please see an extract below from attached Successful Case Studies of Using Natural Wastewater Treatment Systems (Annexure A) on a residential area utilising constructed wetlands in order preserve open space.

### **Case Study 3: The Fields of St. Croix**

*The Fields of St. Croix is an award-winning residential community located in Lake Elmo, Minnesota. It is the first development in Minnesota to use wetland treatment in a clustered septic system, which is designed to treat a total of 45,100 gallons per day. Using the wetland cluster treatment system helps preserve open space*

while protecting the rural character of the community (not allowing high-density development that tends to come with a regional treatment system). The Fields of St. Croix community wetland cluster treatment system was designed and built in two phases, which resulted in two separate systems. The two systems both employ septic tanks for pretreatment (solids settling and filtration) of the wastewater. The first phase was completed in 1997 for roughly \$340,000 in today's dollars, and it serves 48 homes (design flow based on 50 gallons per day per capita), conserving around 1.5 acres where the system is used. The system uses two lined and gravel-filled subsurface flow constructed wetlands (9,000 square feet each) for wastewater treatment followed by two unlined wetland infiltration beds (also 9,000 square feet each and gravel-filled) for effluent dispersal. The detention time in the constructed wetlands component is 5–6 days.... Even today, the Fields of St. Croix is regarded as one of the most innovative approaches to residential development in Minnesota. This is due in part to its use of the relatively small-scale constructed wetland treatment systems.

Extract below from attached report

## SECTION B – DESCRIPTION OF RECEIVING ENVIRONMENT

### **GROUNDWATER, SOIL AND GEOLOGICAL STABILITY OF THE SITE**

**Comment:** the BAR is misleading here. Under the question, whether there is seasonally wet soils (often close to water bodies) the answer is given as “NO”. This is factually incorrect and is also contradicted in the wetland specialise report, filed under Annexure G.

The pipeline runs adjacent to and crosses wetlands therefore these are seasonally wet soils. The wetlands found in the EGG are characterised by sandy soils where water moves laterally through the soils. This movement of water often far exceeds the 30m stated buffer found within urban areas.

The wetland study report further states that: *“The erodibility of the soils is high due to the nature of the soils and the rainfall characteristics within the quaternary catchment.”*



## **GROUNDCOVER**

**Comment:** while it is recognised that the area in question has been greatly impacted by human activities, there are a number of species currently present which need to be acknowledged and protected. Areas impacted by equestrian activities act as buffers around more sensitive areas such as irreplaceable conservation sites immediately west of the development. These areas would not remain intact if these buffers were lost.

In respect of Red Data Species the report states: *“Are there any rare or endangered flora or fauna species (including red list species) present on the site - NO”*

This is incorrect. African Bullfrogs are regularly seen within the study area with important Bullfrog breeding sites located within the study area. A resident whose property is bisected by the proposed sewer line states that he has observed bullfrogs mating in his dam. Three years ago after good rains he counted approximately 40 pairs in the dam. (Annexure B).

Bullfrogs are indicator species only present in intact systems which maintain a relatively good water quality. Although pollution is present in the water systems, the bullfrogs are still breeding in the wetlands along the proposed pipeline.

The specialist report also states that the presence of the African Grass Owl is Highly Unlikely.

We have confirmed the presence of a breeding pair of Grass Owls in the Conservancy in Blue Hills. The Conservancy is in discussions with Geoff Lockwood to compile a conservation plan for the Grass Owls in the Conservancy. Their hunting grounds could be negatively affected by the installation of a sewage line and consequent development in the Conservancy. A resident at Macgillvary road has reported seeing the grass owls on his property and their presence should be investigated. (Annexure B)

We request a meeting on site with the appointed specialist to investigate this report.

The report does not mention the presence of Hedgehogs. We have confirmed the presence of hedgehogs on the Helderfontein property and Beaulieu Bird Sanctuary. Photos attached (Annexure C1 & C2). There have also been reported sightings of hedgehogs on two occasions (most recent December 2013) on a property bisected by the sewage line. (Annexure B)

The specialist indicates that interviews were conducted with residents in the area to understand the fauna present, however no detail of these interviews is provided. We request this information be included in the Final BAR and distributed to I&AP's.



Johannesburg has recently completed a biodiversity plan which seeks to protect these species and areas of environmental sensitivity. The construction of the sewage line would be contrary to that plan and the vision of the GDS 2040 which states a need for the environment to guide development decisions.

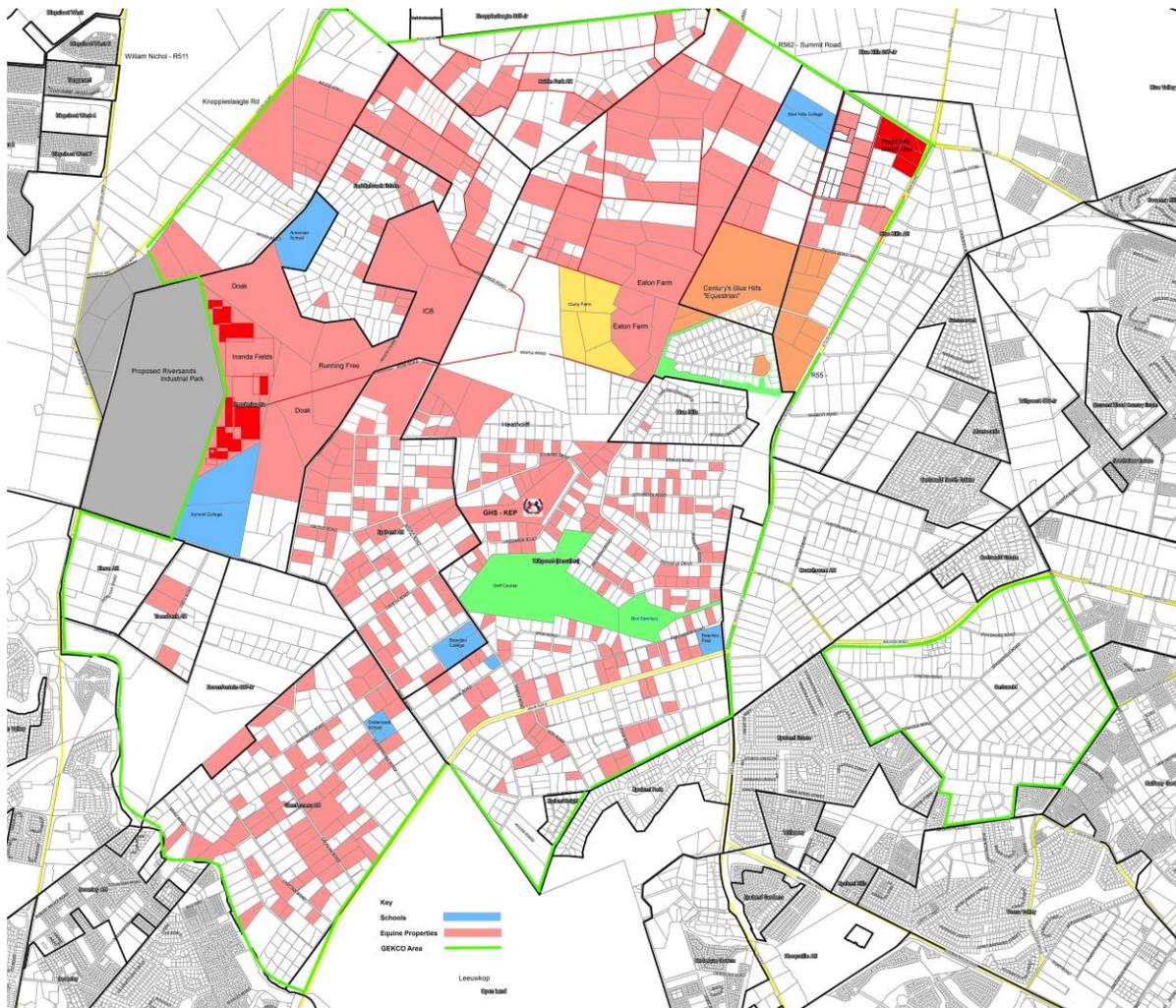
## **LAND USE CHARACTER OF THE AREA**

The Conservancy was established in 2006 under the auspices of the Gauteng Conservancy Association (GCA055) to protect an area comprising approximately 1400 agricultural holdings ranging from roughly from 1 ha properties to much larger 20ha – 200 ha portions. It is located between the urban centres of Midrand and Fourways and is generally peri-urban with a strong equestrian presence. Over time the Conservancy has been subject to varying levels of disturbance and several alien plant species are present. Although it cannot be referred to as a truly natural environment, there are nevertheless many noteworthy examples of natural vegetation of the region: there is a major ridge to the south of the area and many hill slope seepage wetland regions; there are a number of water courses that run through the area and several dams are present.

Due to the equestrian nature of the area (see map below indicating the properties where horses are kept) the area comprises a number of large open green spaces which has and still provides buffer around sensitive wetland systems and has enabled the preservation of numerous species of wildlife that would otherwise not be found in an urban environment. The Conservancy is home to Inanda Country Base (including the Rand Hunt), Kyalami Equestrian Park (previously the Gauteng Horse Society), the Lippizaners and numerous smaller grounds, arenas and yards where competitions and events are regularly held.

The Conservancy provides habitat for a number of important Red Data species such as Hedgehog and Grass Owl and protected species such as the African Bullfrog (with a few remaining pockets of the highly endangered Egoli Granite grassland within the area) and over 250 bird species regularly seen in the Conservancy area (the number of birds regularly seen in the Conservancy is more than half of all the bird species found in Gauteng). A number of other species such as Porcupine, Black Backed Jackal, Cape Otter, Genet and Mongoose are resident in the Conservancy. The Conservancy has recently undertaken a biodiversity study in order to correctly identify and list all species found within the Conservancy. Part of this biodiversity study has also been a detailed map to better understand the movements of these animals within the Conservancy.

*Map of the Conservancy indicating properties where horses are kept*



The Conservancy area is going through a process of rural urbanization, which is not supported by the majority of the residents of the Conservancy (see attached hereto a survey undertaken during 2012 and 2013 as Annexure D). Development has and is threatening the open spaces still prevalent in the Conservancy and one of the objectives of the Conservancy is to try to slow this tide or at least educate it in ecologically sensitive and equine friendly development. The wetlands form an integral part of the area not only from an aesthetic point of view, but also as filters and sites of species' richness and landscape heterogeneity.

This document is prepared within the context of motivation and amplifying the arguments for keeping the Conservancy as a single and open rural area, which is dominated by a strong equine character and underpinned by the realities of a



functioning micro economic block that is primarily supported by the sport horse industry, an industry that is currently valued at approximately R800 million.

**Comment:** This section in the Draft BAR states that the area affected is not a recognised nature conservation area. As indicated above, the pipeline falls within a registered conservancy (Greater Kyalami Conservancy reg no. GCA055) protecting Red Data species listed above, wetlands, endangered Egoli Granite Grassland and functioning biodiversity zones and corridors. Furthermore, as indicated more fully above the Conservancy has been identified as a medium development constraint zone and the Beaulieu Bird Sanctuary as a very high development constraint zone.

Species currently reported within the Conservancy are listed on the attached Ecology Report compiled by Tyrone McKendry (BSc Zoology) and Jacqueline Wetsellar (Msc Zoology) (Annexure E).

Some of these sites have been marked irreplaceable conservation sites on the Gauteng C-Plan. One of the irreplaceable sites is immediately west of the proposed pipeline and could be impacted from pollution and/or densification of the area which is likely to follow the construction of services in the area.

## **SOCIO-ECONOMIC CONTEXT**

The preamble of NEMA provides that “*sustainable development requires the integration of social, economic and environmental factors in the planning, implementation and evaluation of decisions to ensure that development serves present and future generations*”.

The principles, as contained in section 2 of NEMA, serve as guidelines by reference to which any organ of state must exercise its function when taking any decision in terms of NEMA. Section 2 provides, *inter alia*, that environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interest equitably. Development must be socially, environmentally and economically sustainable.

The social, economic and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed and evaluated, and decisions must be appropriate in the light of such consideration and assessment.

**Comment:** the BAR merely states that the proposed development promotes the use and development of land that optimises the use of existing resources such as engineering services, road reserves, social facilities and protected



habitats. Furthermore, it is stated that the proposed development is believed to contribute towards the development of the Crowthorne and surrounding areas, creating job opportunities and improving services (sic) infrastructure of the area.

This is not an investigation nor an assessment of the impact of the proposed development on the socio-economic wellbeing of the surrounding community. A full socio-economic impact is required.

The draft BAR does not consider the current influx of development proposals in the area, many of which the EAP is involved in. Current development applications have been received for: Blue Hills Equestrian, retail, educational and residential; Riversands Industrial; Blue Hills X74; Blue Hills X75 all of which the EAP was or is currently conducting. In addition there is a proposal for a provincial road (K56) and future proposed roads (PWV5 and PWV9) on which many of these motivations are based.

This Draft BAR only considers the impact of digging a pipe through a specific land area, but not the consequent development that it will support. The proposed sewage line has increased in diameter since the original proposal indicating an intention to support more densification than originally planned for. The Draft BAR does not assess or investigate the cumulative effects of all this development although this is a main concern raised by I&AP's.

The installation of services through an area which is outside the urban development boundary will lead to the move of the urban development boundary and the consequent densification of areas within the Conservancy. This is against council and provincial policies which states a need to curb urban sprawl by enforcing urban boundaries and densifying within areas with existing municipal services.

The moving of this urban boundary not only results in the loss of open space and environmental sensitive areas, but increases the municipal and provincial costs to maintain infrastructure and install engineered services at a great cost to replace existing green infrastructure. The Conservancy area contains important wetlands and grassland areas which decrease heating, act as a carbon sink, maintain consistent water supply and assist to regulate weather patterns. These issues are not mentioned or dealt with in the BAR.

### **Open space**

The Conservancy has repeatedly pointed out the necessity of open space. This is reinforced in the JMOSS document referred to in the Draft BAR. Interestingly, the Draft Bar does not include the following references from the JMOSS

*“Fortunately, however, there is an increased awareness amongst the people of South Africa that an important requirement for an enhanced quality of life in urban areas is open space. The planning development and*



*management of a MOSS can no longer be regarded as secondary to other local council functions. It is, therefore, necessary to highlight the role open space plays as the “container” of resources that deliver essential services crucial to the maintenance of an acceptable quality of life for all communities.*

*Open space requires recognition as an asset that requires careful management, and it needs to be afforded a status by all citizens of Joburg that will lead to continued and productive use. Communities and decision-makers have undervalued open space in the past, as the benefits to society had not been clearly defined. As soon as it is realised that open space can render a service to society, an economic value can be assigned to it and hence more informed decisions can be made regarding open space management.*

*In a recent scientific publication by Balmford et al. (2002) on the economic implications of conserving natural habitats, the benefit:cost ratio of conserving these habitats has been conservatively estimated to be 100:1. Such an overwhelming figure, albeit an indicator at a global level, calls for the urgent evaluation of the services rendered by Joburg’s remaining open spaces, the raising of public awareness of these services and the development of appropriate management strategies.”*

It is the responsibility of the professionals (and specialists), city and provincial officials involved in such developments to ensure this vision is achieved through protection of remaining natural and open space areas and promotion of development only on sites which will not lead to the loss of these areas.

### **Equine Industry**

As stated above, the Conservancy is one of the most horse-dense areas in South Africa. The area supports in excess of 2000 horses and supports the sport horse industry which within the Conservancy accounts for approximately R800 million. See in this regard the Equine Survey undertaken by the Conservancy during 2012 / 2013 (attached hereto as Annexure F).

There has been no social impact study done to consider the impact of the proposed development (along with all the other current developments proposed within the Conservancy) on the equine industry.



The equine industry in the Conservancy contains a huge verity of different yards<sup>1</sup> from a single horse to close to 100 horses on a property. Staff employed on these properties are employed to either provide care and safekeeping of a resident-owners horse/(s) or to the resident-owners horse/(s) and their clients. The provision of livery<sup>2</sup> services provides for the most direct jobs in the area. Often a horse owner will choose to stable with a specialist yard where they can receive tuition of guidance related to their own particular interest. The result in labour demand is thus quite significant as a yard owner may have for instance 4 clients and probably 8 horses that would require about 5 staff members to take care of them. It is important to make the distinction between domestic staff that are remunerated by the resident and is non-income producing and these specialist grooms<sup>3</sup> that derive their income indirectly from fees paid by clients. Often livery is viewed as being a “lost leader” as the yard owner receives their income from related activities such as providing lessons.

Large yards in the area employ as many as 50 staff members. The working hours at a livery yard are also extended as the staff need to tend to the horses shortly after sunrise and end their day at sunset. There are extended breaks provided during the day but the staff and their families are often accommodated on the premises so that they are able to work these extended hours. The additional advantage to the labourer in having accommodation provided to himself and his family and not needing to use transport is very significant. The industry is growing and the need for additional labour is increasing steadily at a rate that is presently at least double the country’s economic growth rate.

At a time when our government has stated time and again that creating jobs and providing houses is a top priority, this aspect of the argument needs to be given the correct attention. Breaking up the area by allowing mixed use or carving up the area by creating through roads would mean that many yard owners would either close down or leave their clients to their own devices. Many clients do not have the space, the skills or the inclination to care for their own horses and would simply stop participating in these equine activities. The resultant job losses would be massive.

The equine industry in the Conservancy works and is cost efficient mostly because of the incredibly high population of horses in one area. This means that there are very high economies of scale as service providers such as horse dentists, farriers, feed providers, veterinary doctors, horse physiotherapists, bedding providers, refuse removers, barn and fence builders, arena specialist and many other providers have critical mass and able to maintain a business providing services at affordable prices.

This is indeed a very large problem as when there are large distances to travel between yards, the prices that service providers need to charge become prohibitive and therefore the businesses are not economically sustainable. The

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<sup>1</sup> Yard- A agricultural area containing stables, paddocks and exercise areas associated with equine activities.

<sup>2</sup> Livery – provision of providing shelter, feeding and generally looking after a clients horse.

<sup>3</sup> Groom - A person with specialist skills that are required to handle and care for horses.



Conservancy area has all this at the moment and the enormous growth of ancillary service providers can be seen as a result.

Due to the high horse population in the Conservancy, a unique situation develops where service providers are able to form links in services and products. This can be seen in a tack<sup>4</sup> shop for instance where many items, which are sold by them (in a business that employs several people) are manufactured, maintained and repaired by another business also employing people. If the Conservancy area is not able to provide the economies of scale required, then all these ancillary jobs will be lost as well. Breaking up the Conservancy area would marginalise many of these businesses when demand drops below a certain level.

The Conservancy is unique in Africa as it provides several horse disciplines and specialises in all the Olympic equine disciplines. Most of the top internationally trained and competent trainers are in the Conservancy. The pool of young talent comes from school children in the Johannesburg and Pretoria area. Many of the parents work and live in the Johannesburg northern suburbs and in order for these children to become competitive at their sport, they need to train during the week and then compete on the weekends.

The distance that parents travel during a school day afternoon in order to take children to and from riding lessons is limited. Travelling more than an hour to and another hour from a riding lesson (this is often at peak time traffic in the week is just about the limit without it impacting on the child's ability to do homework). If the equine industry in the Conservancy is marginalised (due to the cumulative effects of all the proposed developments within the Conservancy), the impact on sports development amongst young and adult riders will be devastating. Weekend riders also will mostly ride if their travel time is limited to say no more than 4 hours on a weekend. Assuming they ride on a Saturday and compete on a Sunday, then this also becomes prohibitive once they have to travel further. Also remember that if the number of active riders had to decrease, instructors will have a smaller number of students and their businesses will also be under threat. It's not difficult to see how many hundreds of jobs will be lost in these circumstances.

### **Other infrastructure and services**

South Africa has a severe shortage of electricity and construction of further shopping centres, showrooms, etc. drains available resources.

Areas needing sewage infrastructure the most, such as Diepsloot should be given priority rather than compounding problems with a sewage line which provides for commercial developments. It is a tragedy that a few kilometres away

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<sup>4</sup> Tack - Paraphernalia such as clothing, saddles, protective clothing, horse blankets and very many more associated with horse sports.



South Africans are without basic necessities such as electricity and adequate toilet facilities – yet this proposal is on the table to provide for commercial and retail developments at the expense of a wetlands and wildlife in a registered conservancy; an equestrian industry work roughly R800 million per year and a strong and vibrant community.

Regulation 8 of the EIA Regulations provide that the competent authority (CA), when considering an application must have regard to section 24O and 24(4) listed above as well as the need for and desirability of the activity. The responsibility to investigate and assess this needs and desirability of the proposed activity is given to the EAP (in terms of Regulation 17). This investigation and assessment has not been undertaken and as such, the Applicant is required to undertake the necessary assessment and investigations.

## SECTION C – PUBLIC PARTICIPATION

Section 24 provides that the procedures for the investigation, assessment and communication of the potential consequences or impacts of activities on the environment must ensure, with respect to every application for an environmental authorization that public information and participation procedures provide all interested and affected parties with a reasonable opportunity to participate in those information and participation procedures.

The Draft BAR sets out the public participation process followed in Annexure E.

**Comment:** a public meeting was scheduled over the Easter Holidays despite much objection from residents. Although residents requested a more suitable date for the meeting and extended comment period this was denied by the EAP. Although there is no specific provision in the EIA Regulation to prevent this, it shows bad faith on the part of the EAP in organising a meeting over this period.

The comment period allocated on the Draft BAR was scheduled over the Christmas holiday period, again a difficult time for I&AP's to give adequate attention to responses. Although the EAP did exclude the days between the 15<sup>th</sup> December and 2 January (as provided for in the EIA Regulations) again it shows bad faith on the part of the EAP to run the comment period over this holiday period.

During the initial public participation meeting and subsequent to this in the initial comments, meetings were requested with the engineering consultants. More specifically:

1. Murray Dicks request on behalf of Beaulieu Country Estate



2. Andrew Dicks request on behalf of GEKCO
3. Kristin Kallesen email to Gwen Theron

Further meetings were requested with the town planner responsible for the Retail Africa retail development which is requiring and financing this sewage line.

1. Kristin Kallesen email to Etienne Eygenberger c/o Crishna Bryant 28/11/2012
2. Kristin Kallesen email to Etienne Eygenberger c/o Crishna Bryant 05/12/2012
3. Anne Steffny email to Etienne Eygenberger and Carianne Freebury 13/03/2013

These requests have been denied or not responded to.

We again request a focus group meeting with the engineers on this project to discuss the Conservancy and issues specific to this area.

### **GENERAL**

During the public participation process the Conservancy as well as other Interested and Affected Parties (“I&APs”) raised concern about the capacity of the Northern Sewage Works. The Draft BAR states there is available capacity, however does not supply any documentation to support this. Regular spills have been reported and infrastructure is currently severely limited and compromised in the Dainfern and Diepsloot areas with regular leaks reported in Extension 1 and 6 in Diepsloot.

We request the following documents to support this statement:

- the three latest Environmental Audits of the Northern Wastewater Treatment Facility;
- any reports completed since 2010 detailing current available capacity for current inflow; and
- the most recent report detailing projected inflow and capacity thereof. (There are a number of current developments: Diepsloot East residential, Tanganani X15, Tanganani, Riversands Industrial, Steyn City (10,000 homes), Blue Hills X74, Blue Hills Equestrian Estate, Blue Hills retail and residential estate as well as numerous proposed residential, commercial and retail developments in the Diepsloot area which are all applying for treatment at the Northern Sewage Works in addition to the Retail Africa high-end retail development and Crowthorne.)



## **NO-GO ALTERNATIVE**

The residents in the area have consistently indicated a willingness to work with municipal and provincial bodies to protect and manage the ecological significant areas. Biodiversity stewardship agreements are promoted by GDARD and through partnerships of this nature responsible management is a possibility and must be recognised.

We therefore recommend the No-go alternative as the preferred option as it supports existing and sustainable socio-economic function, does not require further municipal spending for maintenance and operation, and takes a long term view to protection of a conservancy for the sustainability of the city for future generations.

27 January 2014

Kristin Kallesen

Chairperson

Greater Kyalami Conservancy