



02 February 2015

Dear Gwen Theron,

Please see comments from the Greater Kyalami Conservancy with regards the Amended BAR for the Inanda Gate development.

Firstly, I would like to reiterate concerns raised by Darryl van Niekerk attached with regards the inconsistencies of the report which make it difficult to understand exactly what is being applied for.

This is a sensitive wetland area and biodiversity corridor which is linked to the Greater Kyalami Conservancy and therefore the likelihood of many species including endangered and threatened African Hedgehog, African Grass-Owl and Giant Bullfrog exists as stated in the amended report. We are aware of recent sightings of evidence of Spotted-Neck Otter along the Jukskei River. This wetland corridor links to the Diepsloot stream and ultimately the Jukskei River.

The wetland corridors connected to the Conservancy are mentioned in the current Environmental Management Framework as gazetted. (South West Tshwane and North West Johannesburg SEF 2009). This document should be referenced in the report and recommendations applied. This policy states “*No-go development policy applies to footprint of rivers, a 100m buffer zone measured from the edge of the riparian edge outside the urban edge and 32m inside the urban edge;*” The study site is located outside the Municipal Urban Development Boundary and therefore a 100m buffer should be applied.

Furthermore the area has been identified as a Special Management Zone in the recently drafted Gauteng Environmental Management Framework. As this area is located outside the urban edge it is a High Constraint Zone and recommends that activities supporting tourism and recreation dominate. While the polo fields fit into this definition, care needs to be taken that all specialist recommendations are followed to ensure the polo fields do not have a negative impact on the wetland / riverine areas and corridors. Pollution, storm water runoff and usage of ground water are concerns that need to be adequately addressed and the report in its current form does not apply all recommendations put forward by the specialists.



The consultant's response to the Greater Kyalami Conservancy's concerns raised previously have not adequately addressed issues raised. The listed summary of concerns in the report does not list environmental concerns at all, but states the comments raised were only the following:

- *Concerned about Security in the area and that there are already a large number of vagrants in the area.*
- *Concerns about the development of the property versus the polo field only.*
- *Provision of services*
- *Provision of an access road*

The Conservancy contends that a Water Use License must be applied for as the report states a borehole will irrigate the sports fields. (This is contradicted in the cover letter).

There are no medium-high density estates within the vicinity of the site as incorrectly stated in the report, only agricultural holdings and farm portions. The character of the area must be retained.

The comment of 50% of the site being bare soil is contradicted by the photos in the report.

The illegal construction of a boundary wall on this particular site prior to authorisation; within weeks of being issued a compliance notice for the same activity further upstream highlights the fact that this developer pushes boundaries and applies the principle "it is easier to ask forgiveness than permission." The Environmental Control Officer dealing with these projects must ensure that illegal activity which is having an extremely detrimental effect on the wetland systems in the area is stopped and strict enforcement applied.

Kind regards

Kristin Kallesen

Chairperson

Greater Kyalami Conservancy

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