

Seedcracker Environmental Consulting

Attn: Stephanie Cliff

30 April 2013

Comments on Scoping Report for proposed Tanganani Ext 7

Thank you for the opportunity to submit comments on the Scoping report for the proposed housing and mixed use development, Tanganani Ext 7. The Greater Kyalami Conservancy would like to submit the following comments and objections to the proposed development.

1. RED DATA SPECIES are confirmed within the Conservancy and would be very likely to be present on site.

The following species have been confirmed at various locations within the Greater Kyalami Conservancy:

- 1. African Grass-Owl** – known nesting site on the Diepsloot East site. These coordinates have been supplied to GDARD. We would like to request a site visit with the specialist to investigate whether this is still an active nest. There have been a number of confirmed sightings within the past two years, the closest being on Riversands Farm. A nesting site is active in Glenferness and another nest was active in the Blue Hills area until 2013. A fire destroyed the habitat, however this has now recovered. Suitable habitat exists on site for Grass owls and they would likely use this area as a hunting ground. The impact on the vegetation from frequent fires and human activity is reversible and this area could support Grass owls if managed correctly. The ecologist report fails to recognise their presence or the high possibility of their presence on site.
- 2. African Hedgehog** – numerous sightings of hedgehogs have been reported in the Bridle Park / Saddlebrook area and there is a high likelihood of their presence on the study site. They are very difficult to see as they are active at night, however we have successfully recorded them on camera traps in the Conservancy. The ecology report does not consider any red data mammal species to be present on site
- 3. Giant Bullfrog** – while the Giant bullfrog is no longer a red listed species, there is an important breeding area on the Diepsloot East site and they will be present throughout the study area. I see no mention of the Giant Bullfrog in the ecologist report.

These species must be mentioned and discussed in the scoping report with studies conducted by specialists to prepare an avifauna report; herpetology report; and mammal report to examine their presence on site. Numerous

site visits will be required and we would like to suggest the use of camera traps to record nocturnal species. We are able to provide further details of recorded sightings.

2. EXTENSIVE WETLANDS indicate that this site is not suitable for development. Over half of the site is designated as wetland area. The hillslope seepage wetlands are a vital part of the wetland system and cannot be developed on. They also provide unique habitat and this area is identified as an important site of the endangered vegetation type Egoli Granite Grassland. This has been identified in the Environmental Management Framework for this area. The EMF further states that it does not support development in this area (East of Diepsloot). Please see extract from the EMF below:

REMF for South West Tshwane and North West Joburg: (p 54)

The EMF supports the proposed zoning of the Diepsloot west area together with the proposed landuse activities. The zoning of the Diepsloot east area is not supported as this area consists of pristine Egoli Granite Grassland and has been identified by GDARD C-Plan version 2.1 as an 'important' area to assist in achieving conservation targets in the province.

3. DISCOURAGE URBAN SPRAWL AND RATHER ENCOURAGE INTEGRATED HOUSING DEVELOPMENT:

Although Diepsloot has mainly developed post-Apartheid, it reflects the same land use pattern of townships on the fringes of the city from the Apartheid system of spatial inequality. Current thinking promoted by the City in the Corridors of Freedom and other current plans indicates a need to density closer to the City and to bring affordable housing closer to places of work. A large number of Diepsloot residents commute long distances to work every day and a large proportion of their salary is spent on transport. Commutes of 1,5 – 2 hours each way is not uncommon. The pressure on commuters and roads is intense with cyclists, taxis, pedestrians and lift clubs each fighting for space on the road. This burden on Diepsloot residents as well as the region could be alleviated by creating affordable housing next to employment areas (i.e. nearer to Sandton, Randburg, Parktown, etc). Land is available for redevelopment in Randburg at a realistic cost which could enable this type of development. An alternative should be considered to create pockets of affordable housing in the city rather than fuelling expansion around Diepsloot on unsuitable land for development. Studies should be done of Diepsloot residents to find out how many work in areas around Diepsloot and areas a distance away. This would enable the City to create a sustainable and researched plan to accommodate the people. (Public transport options are also better closer to the city)

4. CLIMATE CHANGE MITIGATION GOALS

The City of Joburg 2040 Growth and Development Strategy recognises the imminent pressures of climate change which will result in increased incidence of extreme weather events and temperatures and an increase in flooding. Flooding is already a problem in Diepsloot in low lying areas and this would only increase with the development of this property as

wetlands would be impacted and paved surfaces would increase peak run off. The loss of green areas around Diepsloot will contribute to air pollution and remove vital vegetation which currently regulates temperatures (counters heat island effect) and converts pollutants to oxygen through transpiration.

5. SEWAGE INFRASTRUCTURE

The sewage infrastructure in the existing Diepsloot township is severely compromised - evident by the vast amount of sewage seen flowing in the streets and overflowing from manholes. This is a serious health risk and indicates that the existing infrastructure is not able to cope with the current demand. I attach photos of this as Appendix A. The sewage proposal for this site feeds into the existing network.

The design of the sewage infrastructure to support this development requires pipes to be laid in or adjacent to the wetlands on the site and in Diepsloot. These wetlands should not be infringed upon but alternatives should rather be sought. Sewage is currently flowing from leaking pipes into the Diepsloot wetland. This needs to be addressed and rehabilitation plans for the wetland should be considered.

The Northern Sewage Works has spills regularly into the Jukskei River, especially during peak storm water periods. It has been reported that these spills are in excess of 365 times per year. The Jukskei River catchment area and Hartebeesport Dam are in crisis and much of this pollution can be linked to mismanagement of sewage plants and other infrastructure under the jurisdiction of the municipalities.

6. MAINTENANCE OF SERVICES AND SERVICE DELIVERY

There is a severe backlog in maintenance of the sewage and water supply infrastructure as well as waste removal in the existing Diepsloot township. Please see attached photos labelled Appendix B1-B3. A commitment is required from the City of Joburg in the form of budgets and personnel to ensure that this maintenance takes place. The best plans for the new development can fail without sufficient commitment from the service providers and responsible departments. There is growing frustration in Diepsloot West due to these issues. The issues must be addressed in Diepsloot West before expanding the problem.

7. DIVISION OF DIEPSLOOT INTO EAST AND WEST

Extending Diepsloot to the Eastern side of William Nichol and on either side of Summit Road poses some issues which need to be investigated. The township will be divided by busy dual lane roads where pedestrians and cyclists are often injured and killed due to the high traffic and speeds on this road. The design requires a wall to be built along William Nicol to discourage movement of pedestrians, cyclists and animals across the road outside of the demarcated crossing points.

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Should the walls be compromised it could lead to unsafe pedestrian and cyclist crossings and this has often been the case with previous developments.

The Greater Kyalami Conservancy is very much in favour of promoting Non-motorised transport infrastructure and facilities in line with the Complete Streets initiative of the City of Joburg. Best design standards should be applied as this is an area where pedestrian and cyclists outnumber private cars. The designs applied here can and should prioritise Non-motorised transport as a means to not only road safety, but to promoting equality in Diepsloot and surrounding communities.

Another issue which requires investigation is how investment in Diepsloot East without substantial and proportional investment in Diepsloot West could cause tensions between the two areas if residents in one area feel they have received less investment than the other. We suggest the preferred alternative is to direct investment into Diepsloot West and rebuild the existing Diepsloot township to avoid a situation of 'haves and have nots'. Extensive public consultation will be necessary to ensure residents feel they have a voice in this process.

GEKCO is aware of various individuals and groups in Diepsloot who have a desire to better their community. The input from these parties and all interested parties in Diepsloot is vital to ensure that future development is guided by and supported by the community. The stakeholders we have spoken to were not aware of this EIA process and would like to request a public or focus group meeting.

Sincerely yours,

Kristin Kallesen
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