

THE GREATER KYALAMI CONSERVANCY “GEKCO”



4th March 2013

Dr Gwen Theron
PO Box 13185
Hatfield 0028

Fax: 086 606 6130

Comment to BAR on Kyalami Ridge X3 – Bulk Sewer Line

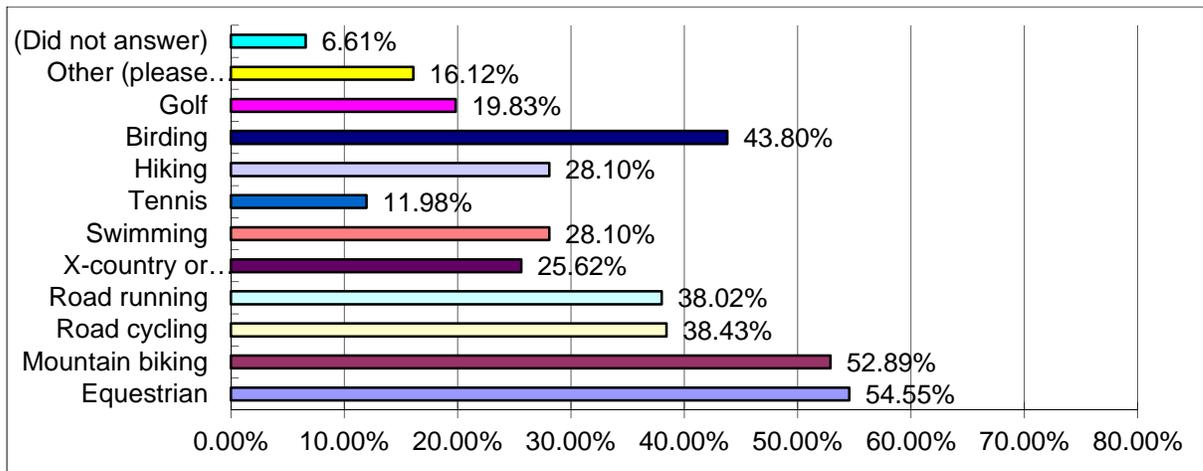
This response covers the areas under the stewardship of the Greater Kyalami Conservancy (GEKCO) namely Carlswald, Crowthorne, Beaulieu, Kyalami AH and Glenferness that are directly affected by the proposed sewer line.

1. **Background - Needs & Wants of residents' survey.** Between the 18th and 25th October 2012 GEKCO ran a public online survey open to all who live in the Greater Kyalami area as defined by the GEKCO boundaries (which incorporates those above) in order to ascertain the needs and want of its constituents (See **APPENDIX A** for full survey results).

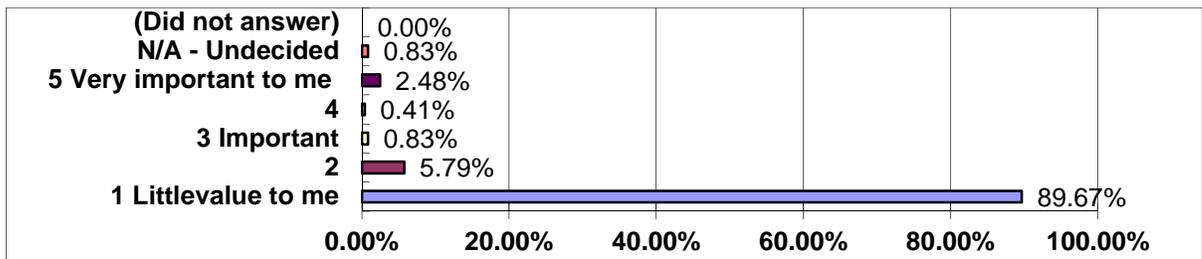
Amongst others, the results of this survey showed that:

- 1.1. The average size of all properties in the area is just under 20 000m². 90.5% of all current inhabitants believe that densification will NOT enhance their lifestyle, no one has any water borne sewage and rely on septic tank systems. GEKCO is championing a move towards closed black water treatment plants that are SABS approved. Over 70% have boreholes and 10% have no access to City water at all and rely solely on their boreholes for water their requirements. As such, any further risk to the water table will seriously compromise the health of residents, wildlife and livestock in the area.
- 1.2. Over 53% of all residents do not believe that the City has provided adequate storm water management and flooding is a frequent problem which will compromise any sewage system that will utilise either the wetlands or open space that will be degraded and compromised as a result of laying pipelines in the area.
- 1.3. The following graph indicates the outdoor sporting and recreational needs of the residents. The effects of densification that will accompany any form of water bore sewage will compromise these activities in the area – please note that over 55% of the residents that are involved in equine sports.

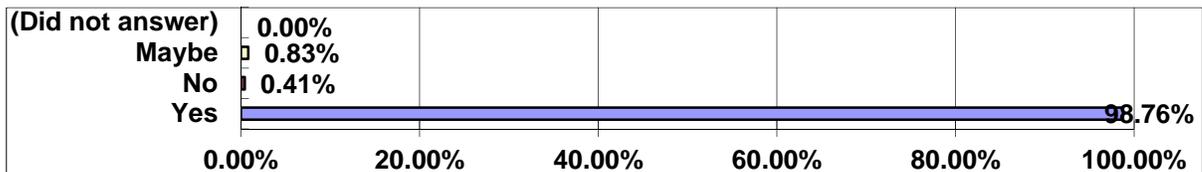
“To conserve, sustain and share the ecology and natural character of greater Kyalami together”



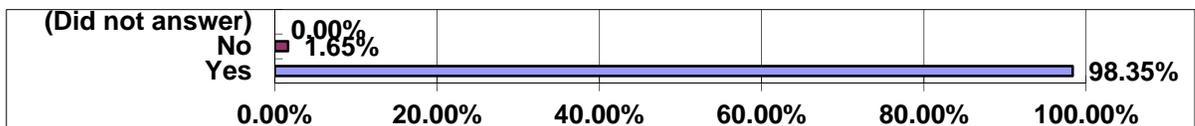
1.4. Over **90%** of residents did not believe that high density developments were of value to them



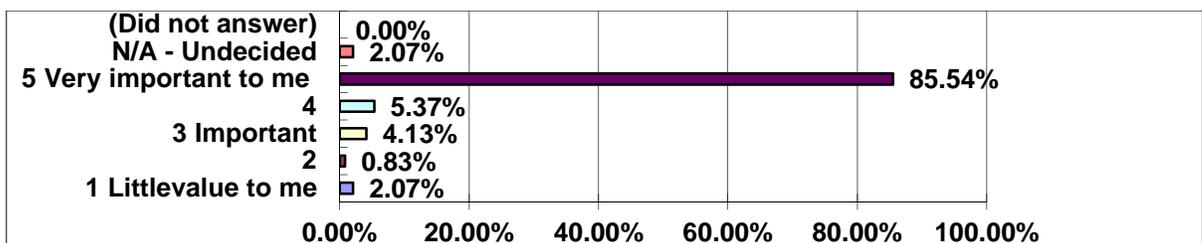
1.5. Over **99%** believe that it is essential to preserve the wetlands of the area



And 98% of respondents believe that GEKCO should be playing a higher role in protecting these wetlands

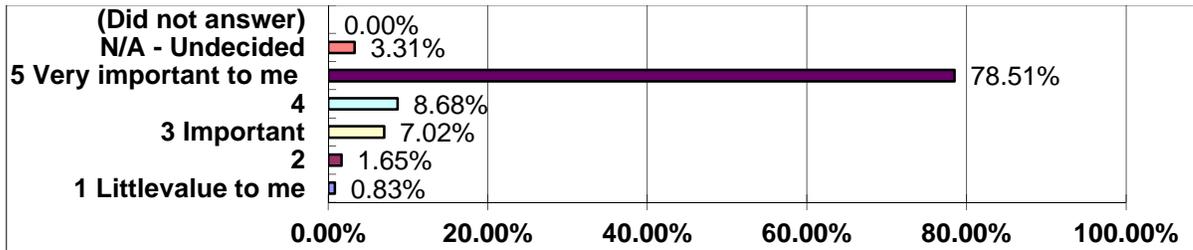


1.6. **95%** of respondents actually believe it is important to be able to leave a legacy of open space and an equine affiliated land use for the area.

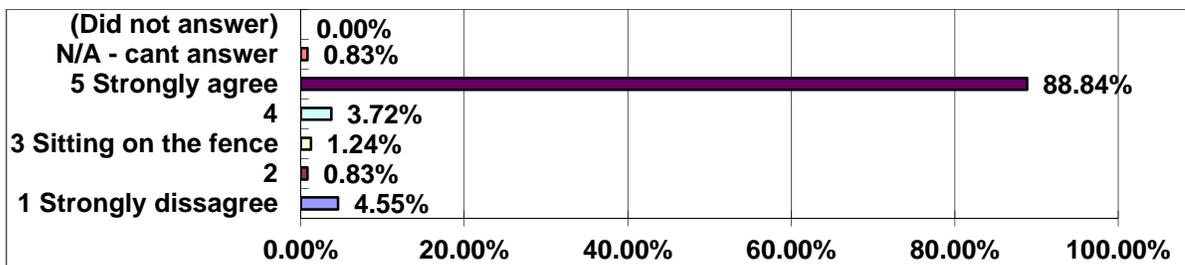


“To conserve, sustain and share the ecology and natural character of greater Kyalami together”

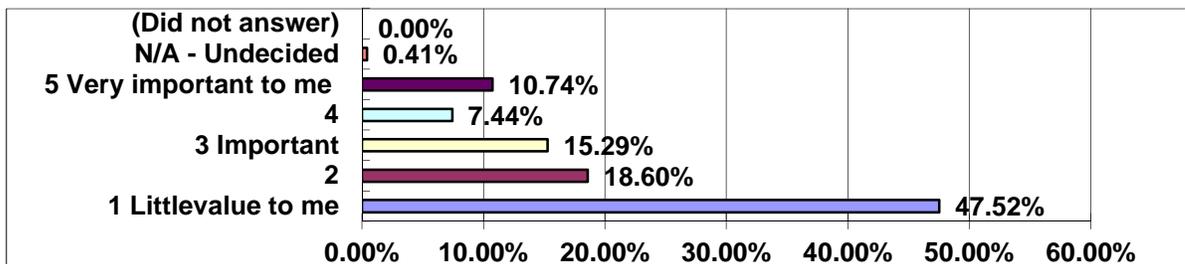
1.7. Over **92%** of all respondents wanted more say over EIA processes and how city policy changes would affect them.



1.8. Over **90%** of respondents said that the city should call for a full referendum in order to call for any changes to the urban edge in order to protect their investments as rural-equine and to halt forced changes to land use upon them



1.9. **66%** of those canvassed wanted to keep the status quo with regards water borne sewage and keep the current septic tank systems or move towards close black water purification systems



To this, the results of recent equine survey are attached as **APPENDIX B** as to the extent of the area considered such that the impact of this proposed pipeline can be more seriously addressed instead of the BID processes implying that this sewage line is already a fait accompli

Therefore, despite the Developers and the City’s own agendas, it would appear that a full needs analysis of the area must be conducted as a prerequisite to any further EIA process

2. No servitudes have ever been declared for sewer lines in the area as stated at the meeting and it is essential that proof of this be established and that the community were informed of this beforehand.

“To conserve, sustain and share the ecology and natural character of greater Kyalami together”

3. We add our voice to the request for a copy of the mandate given to LEAP Environmental Consultants by Joburg Water for the environmental assessment of the sewer line. This has been requested by the Ward Councillor and to date no information has been provided.
4. Please advise which specific developments this sewer line is to serve. At the meeting it was suggested this is to serve the Crowthorne area and the proposed Retail Africa shopping centre. Please list all developments that will be served or will link into this sewer line and also what their (special interest) contributions to this proposed line are (The Promotion of Access to Information Act, Act No 2 of 2000)
5. At the information meeting of the 27th March, a request for legible, electronic formatted maps was requested. Please can these be made available
6. Please provide a full copy of the Kyalami Development Framework Plan 2020 that is referred to as the Johannesburg website does not allow for it to be accessed.
http://www.joburg.org.za/index.php?option=com_content&task=view&id=3182&Itemid=114
7. **Legal Concerns** - From point 6 above, it would appear that there is private funding (or bulk contributions) being made available for the expropriation of private land (Retail Africa providing R9m was bandied about at the information meeting)
 - 7.1. A substantial portion of the line utilizes the private bridle paths of Beaulieu Country Estate and this is an essential drawing point of the ethos of the estate which must be preserved without equivocation. Will these rights remain and which entity will have jurisdiction over these paths going forward? (Similar for the land utilised through, Kyalami AH, Glenferness, Cleve & Treesbank)
 - 7.2. Is Joburg Water the ultimate responsible entity for the construction and maintenance of the proposed project and its after effects?
 - 7.3. Is Joburg Water responsible for all security issues during the construction phase?
8. **Environmental Concerns**
 - 8.1. No engineers were present at the public meeting to answer technical questions about the sewer line with regards a geotechnical investigation and the hydrogeological interpretation thereof of the entire course as amongst other issues, seep-lines abound across the entire area under consideration. We request a special focus group meeting with the engineers on the project to explain these sensitivities of the GEKCO conservancy and that if necessary, a detailed analysis of the area in this regard be forthcoming before the next PP meeting.
 - 8.2. There are numerous red data species across the entire area and especially in the wetlands and as such it is imperative that a full study (wetland, fauna and flora) be prepared in this regard
 - 8.3. Two alternative routes for the sewer line have been ostensibly proposed, but they are variations on the same theme. What real alternatives have been looked at especially with regards following road reserves?
 - 8.4. Is this the scoping part of the EIA or has that already been done? If it has already been done, please forward all the relevant documentation.

“To conserve, sustain and share the ecology and natural character of greater Kyalami together”

- 8.5. Please provide quantitative comment on the capacity of the Northern Works to cope with the additional inflow from this sewer line. [We believe the Northern Sewage Works to already be compromised and as such are suggesting that a moratorium be placed on any further water borne sewage infrastructure development until such time as this capacity issue has been resolved]
- 8.6. What plans are in place to maintain the sewer line if it is installed? Please see **Appendix C** as an example of our very real fears of what is transpiring in Carlswald (a integral part of GEKCO) with regard the City’s inability to service their sewer lines and also to manage capacity issues timeously.
- 8.7. From the above Appendix C – it is evident that the risks of laying a sewer line through a water course or wetland are fraught with problems least of which will be further capacity issues should higher density development ensue (as the City would naturally envisage in this regard). Is this catered for in the sewer line’s current planned capacity
- 8.8. Please provide GEKCO and all I&AP’s with a full list (and results) of all specialist studies that will be undertaken during the EIA?

There may be as yet further undefined causes for concern and GEKCO reserves the right to address these going forward if and as they may materialise.

Andrew Dicks
Mobile – 083 455 6693
Chairman – Greater Kyalami Conservancy