



CITY OF  
**TSHWANE**

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Dear Sir/Madam

### **DRAFT SCOPING REPORT FOR THE PROPOSED MINING OF QUARRY 6A ASSOCIATED WITH THE UPGRADE OF NATIONAL ROAD R573 (MOLOTO ROAD), GAUTENG**

The report dated 18 November 2020 refers,

#### **1. INTRODUCTION**

The Environment and Agriculture Management Department (the Department) has considered the Draft Scoping Report in respect of the above-mentioned application. The Draft Scoping Report is submitted to the Environment and Agriculture Management Department of the City of Tshwane, hereafter referred to as 'the City', as a commenting authority as required in terms of the National Environmental Management Act (NEMA) and the EIA Regulations of December 2014.

#### **2. PROJECT LOCATION AND DESCRIPTION**

GA Environment (Pty) Ltd has been appointed by South African National Roads Agency SOC Ltd as an independent Environmental Assessment Practitioner (EAP) to undertake environmental assessment for the proposed establishment of quarry –to be known as Quarry 6A - on part of the Remainder of the farm Doornpoort 295-JR. The site is bordered by national road N1 in the west, Transnet railway line in the north, residential dwelling units in the east and open velds on the south.

The site is accessed from the existing railway service road north of the proposed development site and via Maroele road through privately owned land. The total extent of the proposed development measures approximately 603Ha. The proposed development site is located within the area of jurisdiction of the City of Tshwane Metropolitan Municipality.

The duration of the proposed development is approximately 6 (six) years from the start of mining activities. The proposed development entails the sourcing of 66 000m<sup>3</sup> overburden as well as 114 000m<sup>3</sup> crushed G6 material, and 584 000m<sup>3</sup> G1 material from Norite. The proposed development site will consist of the following:

- Quarry 6A Borrow Pit 1 (Q6ABP1) includes a crushing area, a spoil area, a generator and fuel storage area and temporary toilets – 18.74ha;
- Quarry 6A Stockpile 1 (Q6AS1), comprises of a topsoil/ overburden stockpile area – 19.52ha;
- Quarry 6A Borrow Pit 2 (Q6ABP2) includes a crushing area, a spoil area, a generator and fuel storage area and temporary toilets – 19.81ha;
- Quarry 6A Stockpile 2 (Q6AS2), comprises of a topsoil/ overburden stockpile area – 17.98ha;
- Quarry 6A Quarry 1 (Q6AQ1), includes a crushing area, a spoil area, a generator and fuel storage area and temporary toilets – 19.46ha;
- Quarry 6A Quarry Stockpile 1 (Q6AQS1) comprising a topsoil/ overburden stockpile area – 16.83ha;
- Quarry 6A Borrow Pit 3 (Q6ABP3) includes a crushing area, a spoil area, a generator and fuel storage area and temporary toilets – 18.48ha;
- Quarry 6A Stockpile 3 (Q6AS3), comprises of a topsoil/ overburden stockpile area – 15.71ha;
- Quarry 6A Borrow Pit 4 (Q6ABP4) includes a crushing area, a spoil area, a generator and fuel storage area and temporary toilets – 19.02ha; and
- Quarry 6A Stockpile 4 (Q6AS4), comprises of a topsoil/ overburden stockpile area – 8.33Ha

According to the report, SANRAL is exempted from applying for a mining right to develop a quarry to extract road construction material. However, application for the clearance of vegetation on a 44 hectare site should be applied for and hence the application.

The proposed development entails undertaking the following listed activity in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) and Environmental Impact Assessment Regulation, 2014, under: *Listing Notice 1, GNR 984: Activity 15* and *Listing Notice 3, GNR 985: Activity 12*.

### 3. KEY FACTORS INFORMING THE COMMENTS

In making its comments in respect of the proposed activity the Department has taken, inter alia, the following into consideration:

- The information contained in the Draft Scoping Report dated 18 November 2020 and received by the Department on the 23 November 2020.
- Information obtained from the Departments' s information base including *inter alia*:
  - Geographic Information System (GIS data).
  - Gauteng Open Space Plan (GOSP).
- Compliance with applicable Municipal, provincial and national policies and guidelines including:
  - The Draft Bioregional Plan for the City of Tshwane;
  - The Gauteng Agricultural Potential Atlas (GAPA)
  - The Gauteng Conservation Plan version 3.3 (C PLAN);
  - The Gauteng Provincial Environmental Management Framework (GPEMF) ;
  - The National Environmental Management Act 1998 (Act 107 of 1998) (NEMA): its decision-making principles and Environmental Impact Assessment Regulations 2017; and
  - The Tshwane Open Space Framework (TOSF).
- Consultation meeting held on 14 December 2020
- Meeting notes CoT-6A6B – 14.12.2020
- Consent letter (dated 09 July 2020) from landowner, First Land Developments Limited

#### 4. DISCUSSION

In reviewing the application the Department made the following findings:

- a) First Land Developments Limited owns the proposed development site as informed by the Tshwane GIS. A signed consent letter granting SANRAL permission to only conduct geotechnical investigation on the proposed development site has been shared with the Department. The Department is satisfied with the submission.
- b) According to Google Earth Imagery (dated 02/08/2002), a quarry was developed on the southern section of the proposed development site wherefrom material were sourced to upgrade the N1 and N4 roads. In response to the enquiry about the difference the choice of site for the proposed development, KBK Engineers indicated that the ridge onsite is good source of G1 material to be utilised as a top layer in the road construction and thus the quarry will be expanded further towards the sourcing of the additional G1 material. Other sections of the sites identified on the layout plan will be quarried for the G5 and G6 material which will be utilised as the founding layers. The Department is stratified with the submission.
- c) The proposed development is planned on a rock outcrop which will have to be blasted to source the required construction. As a result, the proposed development has high potential noise and visual impacts to the neighbouring N1 road users and neighbouring residential communities. However, KBK Engineers and GA Environment alluded during the consultation meeting that the noise will be kept at acceptable acoustic levels which matches developments of similar nature in the area. The Department request that details about such mitigation measures aimed at reducing the potential noise and air pollution should be clearly articulated in the Draft EIA report.
- d) Concerns regarding the impacts of blasting have been raised and addressed as indicated in the report. The report indicates that affected landowners will be consulted prior to blasting commencement. However, potential impacts to the traffic along national road N1 are not satisfactorily addressed by the response. The Department request that details about the traffic impact in relation to the potential blasting should be provided in the Draft EIA report.
- e) During consultation meeting conducted on the 14 December 2020, KBK Engineers indicated that the impending blasting will not result in the splashing of rocks and debris into the air during blasting. GA Environment indicated associated details about blasting will be outlined in the Blast Management Plan which will be incorporated into the EMPR. The Department request that the Blast Management Plan should be included in the Draft EIA report.
- f) According to the Tshwane GIS, a watercourse named Katdoring-loop traverse the southern section of proposed development site. However, the watercourse is not depicted on the hydrological map represented as Figure 12 of the report. Instead, two wetlands located outside the southern section of the site have been delineated. The Department cannot evaluate the potential impacts to the Katdoring-loop subject to the review of the Wetland Delineation and Assessment report.
- g) The report indicates that no new access roads will be constructed for the haulage of material to their respective destinations. During consultation meeting held on the 14 December 2020, KBK Engineers indicated that the haulage routes will be to the north towards the existing railway line. However, clarity on the positioning of the access road could not be ascertained in light of the proposed borrow pits and stockpile which are planned along the existing access roads. In light of the above, the Department is of the view that on the contrary new access roads outside the proposed borrow pits and stockpiles areas will have to be planned which negate the assertion that no new access roads will be constructed. The Department request clarity whether or not the proposed access roads will traverse the watercourse on the northern section of the site. Should the road traverse the watercourse, the associated listed activity should be applied for and reflected in the Draft EIA report.

- h) During consultation meeting conducted on the 14 December 2020, GA Environment indicated that a wetland was identified on the northern part of the site. However, the wetland is not delineated in any of the attached maps. The Department cannot evaluate the potential impacts to the watercourse subject to the review of the Wetland Delineation and Assessment report.
- i) According to the Draft Bioregional Plan for the City of Tshwane, the northern and southern sections of the proposed development is classified as Other Natural Areas. As a result, the site is not earmarked for any biodiversity management and conservation as informed by the Gauteng Conservation Plan (CPLAN). Therefore, the proposed development therein does not conflict with objectives of CPLAN and Bioregional Plan.
- j) The Gauteng Conservation Plan (CPLAN) and the Draft Bioregional Plan for the City of Tshwane depicts the middle section of the proposed development site classified as an Important Area / Critical Biodiversity Area with a patch of Ecological Support Area. The high ecological sensitivity is attributed to the potential presence of the red data bird habitat and primary vegetation. As a result, this section of the site is earmarked for biodiversity conservation and management. Therefore, the proposed development therein is not aligned with the conservation objectives of CPLAN and Bioregional Plan.
- k) According to the Gauteng Provincial Environmental Management Framework (GPEMF), the proposed development site is classified as Zone 1: urban development zone with a patch of Zone 2: high control zone within an urban development area. The proposed development is undesirable in these zone. Therefore, the proposed development conflicts with GPEMF's objectives.
- l) The proposed development site is located within close proximity to the Wonderboom airport as depicted in the Tshwane GIS. As a result, aircrafts are often observed flying at low altitude within close proximity to the proposed development site. However, comments regarding potential aviation-related issues are not sourced from the Wonderboom airport management or the South African Civil Aviation Authority (SACAA). The Department request that the aforementioned parties should be consulted and their inputs included in the Draft EIA report.
- m) The report indicates that the Transnet Freight Rail was consulted and awaits the receipt of formal wayleave application concerning the proximity of blasting points to the TRF railway line. In addition, the Department request clarity regarding use of railway infrastructure for the haulage of the material emanating from the proposed development site.
- n) The report indicates that the following specialist studies will be conducted and included in the Draft EIA:
- Terrestrial Ecological Assessment
  - A Wetland and Aquatic Assessment
  - Heritage Impact Assessment report

## 5. RECOMMENDATIONS

The Department recommends that the following issues be taken into consideration:

- a) Confirmation regarding the absence or presence of Katdoring-loop traversing the southern section of the proposed development should be provided in the Draft EIA report.
- b) A layout plan should be revised to indicate the location of the watercourses in relation to the proposed development should be designed and included in the Draft EIA report.
- c) Clarity regarding whether or not the proposed access roads will traverse the watercourse on the proposed development site should be provided in the Draft EIA report.
- d) Should the planned access road(s) traverse the watercourses on the proposed development site, the associated listed activity should be applied for and reflected in the Draft EIA report.



- e) Details about such mitigation measures aimed at reducing the potential noise and air pollution should be clearly articulated in the Draft EIA report
- f) All identified specialist reports should be conducted and included in the Draft EIA report.
- g) Clarity regarding use of railway infrastructure for the haulage of the material emanating from the proposed development site should be provided in the Draft EIA report.
- h) Proof of the lodgement of wayleave application with Transnet Freight Rail regarding proximity of blasting points to the TRF railway line should be included in the Draft EIA report.
- i) Comments regarding potential aviation-related issues induced by the proposed development should be sourced from the Wonderboom Airport Management as well as the South African Civil Aviation Authority (SACAA).
- j) A layout plan showing the proposed blasting points in relation to the railway infrastructure should be designed and included in the Draft EIA report.
- k) Clarity regarding the potential impacts and associated mitigation measures regarding the blasting operations in close proximity to the national road N1 should be provided in the Draft EIA report.
- l) The Blast Management Plan should be compiled and included in the Draft EIA report.

## 6. CONCLUSION

The Department will provide final comments upon the receipt of the Draft EIA report addressing the above-mentioned recommendations.

Yours faithfully



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**Mr Aluoneswi Mafunzwaini**

**Date: 25/01/2021**

**DIVISIONAL HEAD: ENVIRONMENTAL MANAGEMENT AND PARKS DIVISION**

**Letter signed by: Rudzani Mukheli**

**Designation: Deputy Director: Environmental Planning and Open Space Management**

**Section**

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