

# Environment & Agriculture Management Department

Room A0E009 | Tshwane House | Ground Floor, Block A | 320 Madiba Street | Pretoria | 0002 P O Box 1454 | Pretoria | 0001

Tel: 012 358 8801/ 2449/1351 |

Email: AbelMa@tshwane.gov.za | www.tshwane.gov.za | www.facebook.com/ City Of Tshwane

My ref:

DMR ref:

Section:

GP30/5/1/1/2/(00002)BP

Contact person:

Environmental Planning & Open Space Management Section

Tel: 012 358 7334

Fax:

Email: KemmoneM@tshwane.gov.za

Date:

22 June 2021

**GA Environment** P O Box 6723 Halfway House 1685

Attention: Kirthi Peramaul Tel: (011) 312 2537 / 2584 Fax: (011) 805 1950

Email: kirthip@gaenvironment.com /environment@gaenvironment.com

Dear Sir/Madam

DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR THE PROPOSED MINING OF QUARRY 6A ASSOCIATED WITH THE UPGRADE OF NATIONAL ROAD R573 (MOLOTO ROAD). **GAUTENG** 

The report dated 26 May 2021 refers,

## INTRODUCTION

The Environment and Agriculture Management Department (the Department) has considered the Draft Environmental Impact Assessment Report in respect of the above-mentioned application. The Draft Environmental Impact Assessment 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.

## 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:

- a) The information contained in the Draft Environmental Impact Assessment Report dated 26 May 2021 and received by the Department on the 08 June 2021.
- b) Information obtained from the Departments' s information base including inter alia:
  - Geographic Information System (GIS data).
  - Gauteng Open Space Plan (GOSP).
- c) 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).
- d) Site inspection conducted on 15 June 2021

#### 4. DISCUSSION

In reviewing the application the Department made the following findings:

- a) The Wetland Assessment report identified the wetland located north but outside the proposed development site and thus will not be directly impacted by the proposed development. Similarly, the drainage line has been identified in the northern section of the site but has been previously bisected by the establishment of the existing gravel access road and the existing railway line. As a result, the specialist recommends the approval of layout alternative 2 to avoid direct impact on the watercourse areas. Therefore, the potential impacts associated with development of Quarry 6A on the watercourses are negligible.
- b) In response to the presence of Katdoring-loop, GA Environment indicated that the wetland specialist could not locate the watercourse and thus requested the Tshwane GIS map in order to verify. The Department is of the opinion that the watercourse may have been impacted by various anthropogenic factors onsite and thus no longer exist. During site inspection conducted on the 15 June 2021, borrow pit (BP4) and other developments were observed to have been planned north of the dilapidated historic quarry which is located further northwards away from the potential location of the Katdoring-loop. Therefore, the proposed development will not directly impact on the watercourse area.
- c) According to the Heritage Impact Assessment report, no sites or features of cultural or historic significance were identified on the proposed development site. Therefore, the proposed development does not have heritage impacts associated with it.
- d) In response to the concern regarding rehabilitation measures post development, KBK Engineers indicated the site will be rehabilitated such that no damming of water occurs. In addition, Ga Environment indicated that site specific rehabilitation plan will be compiled and included in the Mine Closure application after the material have been sourced from the site. The Department will provide formal comments on the rehabilitation of the quarried sites during the decommissioning phase.
- e) The layout plan depicts several positions earmarked for the storage of generator and fuel storage. However details about the quantity of fuel to be store is not indicated in the report. In addition, the reason for storing the fuel onsite when the proposed development site is abutting a fuel station is not provided in the report. Therefore, the Department cannot evaluate the desirability of fuel storage onsite.
- f) During site inspection on the 15 June 2021, few aircrafts were observed flying over the proposed development site. However, the requested comments from the Wonderboom Airport Management as well as the South African Civil Aviation Authority (SACAA) are still outstanding. Therefore, the Department cannot evaluate the potential aviation impacts associated with the proposed development.
- g) Three freight locomotives were observed travelling along the existing railway line and Transnet personnel working within the vicinity of the railway line. However, comments regarding the usage of the railway access roads are not provided in the report. Therefore, the Department cannot evaluate the potential impacts associated with usage of the Transnet access roads for haulage of material from the proposed development site.
- h) The layout plan depicts access roads planned westwards away from the residential dwelling. During site inspection conducted on the 15 June 2015, the access roads used lies along the eastern and northern boundary of the site causing significant dust impact. The Department request that the proposed dust suppression measures in the EMPr should be implemented. In addition, a shade net should be fitted along the eastern section facing the abutting residential dwelling to alleviate the dust impact.

 The Blast Management Plan is still outstanding. Therefore, the potential impacts associated with potential blasting cannot be evaluated.

#### 5. RECOMMENDATIONS

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

- a) Comments regarding the need and desirability of fuel depot on the proposed development site should be provided in the Final Environmental Impact Assessment (EIA) report.
- b) Details about the combined quantity of fuel to be stored on the proposed development site should be indicated in the Final EIA report.
- c) Clarity regarding the storage of fuel on the proposed development site when the proposed development site is abutting a fuel station should be provided in the Final EIA report
- d) Layout Alternative 2 which excludes watercourse from the proposed development should be implemented.
- e) Implementation of a shade net along the eastern section facing the abutting residential dwelling to alleviate the dust impact should be investigated and comments included in the Final EIA report.
- f) 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).
- g) The Blast Management Plan should be compiled and included in the Draft EIA report.
- h) A Rehabilitation Plan regarding the borrow pits will be provided during the decommissioning phase.

# 6. CONCLUSION

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

Yours faithfully

Mr Aluoneswi Mafunzwaini

Date:

DIVISIONAL HEAD: ENVIRONMENTAL MANAGEMENT AND PARKS DIVISION

Letter signed by: Rudzani Mukheli

Designation: Deputy Director: Environmental Planning and Open Space Management

Section

CC Gauteng Department of Agriculture and Rural

Mr. Rina Taviv

Tel: (

Fax:

(011) 240 3400 (011) 240 2700

DMR

Development

Att

Mr Nkosinathi Mahlaba

nkosinathi.mahlaba@dmr.g

ov.za