



Reference: GAUT 002/22-23/E3249  
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Dear Mr. Khangwelo Desmond Musetsho,

**COMMENTS ON THE DRAFT BAR: PROPOSED UPGRADE OF LEACHVILLE EXTENSION 2 SEWER PUMP STATION AND ASSOCIATED INFRASTRUCTURE ON ERF 374, LEACHVILLE TOWNSHIP, BRAKPAN; CITY OF EKURHULENI METROPOLITAN MUNICIPALITY**

Regarding the above-mentioned draft report received by the Department on 13 September 2023, herewith receive the comments from the Department.

**1. Description of the site/property/route and development**

The proposal entails an upgrade of the existing Leachville Extension 2 Sewer Pump Station and its associated infrastructure upgrades will cover an area of 747m<sup>2</sup>. The pump station was built within a seep wetland. The proposed scope of work are as follows:

- **At the pump station:**
  - Upgrading the design capacity of the pump station to 33 liters/second
  - Upgrade the submersible pumps in the existing sump to suit the flow.
  - Raise the levels of the underground infrastructure by 80mm and the inlet manhole so there is no spillage in the pump station.
  - Construct an extra sump of 42m<sup>3</sup> to increase the emergency storage capacity.
  - Install new mechanical screens in the old screen room.
  - Provide backup power (generator).
  - Construct a security room with a toilet and basin.
- **Emergency Pond 1** will be expanded to increase its capacity to 181.5m<sup>3</sup> (121m<sup>2</sup>)
- **Emergency Pond 2** (3000m<sup>3</sup>) will be re-engineered and lined with a geosynthetic clay lined.

- The existing access road is 105 meters in length and will be paved and widened from 2m to 4.85 meters (530m<sup>2</sup> area) and its T-junction redesigned with the New Kleinfontein Road.

## 2. Applicable legislation and policies

The report has made provisions to accommodate applicable legislation, policies, and guidelines. The activities entail an upgrade of the existing Leachville Extension 2 Sewer Pump Station and its associated infrastructure on the above-mentioned site. The report has made provisions to accommodate all applicable legislation, policies, and guidelines. The activity entails the upgrade of existing Leachville Extension 2 Sewer Pump Station and its associated infrastructure, for which its related impact is subject to regulatory legislations, policies, and guidelines such as the National Environmental Management Act, 1998 (Act No. 107 of 1998 as amended). The Gauteng Environmental Management Framework, 2015 (GPEMF, 2015) identifies the proposed site as Environmental Management Zone 1 (dominated by urban development activities and it promotes infill development

## 3. Description of the receiving environment

The Departmental Conservation Plan Version 3.3 depicts a range of sensitive environmental features such as Ecological Support Area, Endangered Threatened Ecosystem and Primary Vegetation (Gauteng Grassland). The presence of the seep wetland has also been confirmed during site inspection. NWA Section 21 (c) and (i) water uses will be triggered by the proposed project activities. Moreover, a Water Use License Application (WULA) has been lodged with the Department of Water and Sanitation (DWS).

Most of the project area has historically been modified to accommodate the development of the Leachville residential area and the pump station and remains in a transformed state. Most of the project site comprises transformed habitat associated with the existing pump station, emergency ponds, road upgrade and has completely been transformed and no natural vegetation remains.

## 4. Listed activities applied for

The following listed activities have been applied for-

Activity No and description	Description of the development related to the listed activity
<p><b>GNR 327: Activity 19 of Listing Notice 1:</b></p> <p>The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from</p> <p>(i) a watercourse;</p>	<p>The upgrading of the pump station will take place within a seep wetland and require the removal of 500m<sup>3</sup> of unstable soil material and depositing of more than 500m<sup>3</sup> of infill material to construct, raise and upgrade the pump station infrastructure.</p>
<p><b>GNR 324: Activity 12 of Listing Notice 3:</b></p> <p>The clearance of an area of 300m<sup>2</sup> or more of indigenous vegetation except where such clearance of indigenous vegetation is for maintenance purposes undertaken in accordance with a maintenance management plan.</p> <p>(c) Gauteng</p> <p>(i) Within a critically endangered or endangered ecosystem listed in section 52 of NEMBA.</p> <p>(ii) Within a crucial biodiversity area (CBA) or Ecological Support Area (ESA) identified in conservation or bioregional plans.</p>	<p>The pump station, road and emergency pond upgrades will require the removal of 1280m<sup>2</sup> of vegetation on a public open space which falls within the Tsakane Clay Grassland (threatened ecosystem) and an ESA as identified in the Gauteng Conservation Plan vers. 3.3 i.e.,</p> <ul style="list-style-type: none"> <li>- To widen the access road (530m<sup>2</sup>)</li> <li>- Upgrade the pump station (747m<sup>2</sup>)</li> </ul>

(iii) On land, zoned open space, conservation or equivalent zoning.	
<p><b>GNR 324: Activity 14 of Listing Notice 3:</b> The development of</p> <p>(ii) infrastructure of structures with a physical footprint of 10m<sup>2</sup> or more – where such development occurs</p> <p>(a) within a watercourse</p> <p>(c) in Gauteng</p> <p>(iv) Sites identified as Critical Biodiversity Areas (CBA) or Ecological Support Areas (ESA) in the systematic biodiversity plans adopted by the competent authority or in bioregional plans.</p> <p>(v) Sites identified within threatened ecosystems listed in terms of NEMBA.</p>	<p>The pump station upgrades, and associated infrastructure (emergency ponds, access road) will have a physical footprint area of 1280m<sup>2</sup> and is located within a seep wetland on Erf 374 (public open space) in Gauteng, in an area identified as an ESA and threatened ecosystem (Tsakane Clay Grassland) in terms of the Gauteng Conservation Plan and NEMBA (2022 Revised List of Threatened Ecosystems). i.e., - Pave and widen of access road to have final footprint area of 530m<sup>2</sup> (105 meters in length and width of 4.85 meters). - Upgrade of pump station will cover an area of 747m<sup>2</sup>.</p>
<p><b>GNR 324: Activity 23 of Listing Notice 3:</b> The expansion of</p> <p>(i) dams/ weirs where the dam/weir is expanded by 10m<sup>2</sup> or more or;</p> <p>(ii) Infrastructure or structures where the physical footprint is expanded by 10m<sup>2</sup> or more where the expansion occurs;</p> <p>(a) Within a watercourse</p> <p><b>(c) in Gauteng</b></p> <p>(iv) Sites identified as CBA or ESA in terms of the Gauteng Conservation Plan or bioregional plan;</p> <p>(v) Sites identified as threatened ecosystems in terms of NEMBA;</p> <p>(x) Sites zoned for conservation use or public open space or equivalent zoning</p>	<p>The Emergency Pond 1 (i.e., dam) will be expanded by 36m<sup>2</sup>, the road expanded by 530m<sup>2</sup> and the pump station by upgraded to 747m<sup>2</sup> (other infrastructure/structures) and is located within a seep wetland (watercourse) on land zoned public open space, on an area identified as an ESA in terms of the Gauteng Conservation Plan and the Tsakane Clay threatened ecosystems (NEMBA) in Gauteng.</p>

## 5. Specialist studies

All specialists' reports submitted are noted and must form part of the final Basic Assessment Report.

## 6. Impacts Identification, Assessment and Mitigation

Identification of impacts and the proposed impact assessment methodology provided in the Draft Basic Assessment Report is supported as this will lead to a reliable conclusion that the mitigation measures identified will reduce impacts to an acceptable level.

## 7. Assessment of alternatives

Three (3) design Alternatives have been considered for the proposed upgrade including the No-Go alternative were outlined in Section 3 the report of the Draft Basic Assessment Report (DBAR). It is noted on Section A (3) of the Draft Basic Assessment Report (BAR) that two alternatives have been identified.

## **8. Need and desirability of the development**

The pump station and associated infrastructure upgrade will result in improvement of sanitation infrastructure to Leachville Township (Ext 2 and 3) community. The existing pump station has been spilling raw sewage into the environment for an extended period. These proposed upgrades will reinstate the operating capacity of the existing pump station and create additional capacity. The upgrades will ultimately cease the spillage of raw sewage into the environment and resolve sewage blockages in Leachville Township.

## **9. Maps, layout plans, services route positioning**

The facility illustration, Locality Map and Layout Map included in the Draft BAR Report are noted. However, at least one, clear layout plan overlain by a composite sensitivity map, depicting the extent of activity on a layout plan with a **legend** easily linked to activity components must also be included in the Final Basic Assessment Report. Results emanating from the Wetland Assessment Report should also be incorporated in the layout plan. Furthermore, the Layout Map must include the following:

- All existing infrastructure on site, especially the roads;
- Wetlands and rivers;
- The buffer areas and;
- The “no-go” zones.

## **10. Public Participation Process**

Please note that a full public participation process should be undertaken in accordance with Regulation 41. In terms of a transparent and inclusive public participation process the interested and affected parties, particularly relevant authorities, and other institutions which in terms of their mandates are legally required to comment on the proposed development, should be informed and given an opportunity to comment on the proposal. All evidence of the Public Participation Process being undertaken must be included in the report. The newspaper advert and site notices photos must be attached to the final BAR.

## **11. Environmental Management Programme (EMPr)**

The EAP must ensure that all significant impacts identified during the impact assessment as well as issues raised by I&APs have been addressed in the EMPr. Responsibility and timeframes must be clearly defined and assigned for all phases of the development. Furthermore, the impacts to be identified as well as its mitigation measures as per the proposed alternatives must also form part of the Final BAR.

Notwithstanding the above, your attention is drawn to the fact that the success of the application may be prejudiced by failure to provide relevant information as requested above.

If you have any queries regarding the contents of this letter, please contact the official of the Department at the number or email address indicated above.

**Yours faithfully,**



**Ms. Hellen Sithole**  
**CEO Grade-A: Impact Management**  
**Date:13 October 2023**



## water & sanitation

Department:  
Water and Sanitation  
REPUBLIC OF SOUTH AFRICA

### GAUTENG PROVINCIAL OPERATIONS

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**ATTENTION: Marissa Botha**

#### **BASIC ASSESSMENT (BA) PROCCES FOR THE PROPOSED UPGRADE OF LEACHVILLE EXTENSION 2 SEWER PUMP STATION AND ASSOCIATED INFRASTRUCTURE, ERF 374, LEACHVILLE TOWNSHIP, BRAKPAN, CITY OF EKURHULENI, GAUTENG PROVINCE**

The above-mentioned Basic Assessment Report (REF GAUT 002/22-23/E3249) has reference.

The Basic Assessment Report (BAR) has been evaluated by this office, within the context of policies related to water resources management. The following aspects should be addressed and complied with by the applicant:

1. On Pg.6 of the report it's indicated that the Water Use Licence Application (WULA) was lodged with the department online system with reference number WU2928, please note that it is your responsibility to ensure that all the activities triggered by WUL are authorized before commencement.
2. Stand-by generator must be available on site during operation phase and automatically operate (i.e. run) immediately should there be any power outages.
3. A lined emergency sewage detention pond must be part of the pump station for temporary storage of sewage for a period not less than 24 hours during emergency situations. Furthermore, the design report for the pond must be submitted to this office with the WULA for approval prior to construction of the pump station facilities.



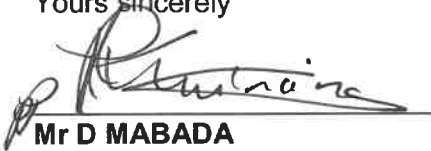
**NATIONAL DEVELOPMENT PLAN**  
*Our Future - make it work*

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4. The following conditions must also be complied with if the pump station is located within the watercourse (up to the edge of the riparian zone or the 1:100 year floodline, whichever is the greatest):
  - 4.1 Measures must be put in place to ensure that the pump station:
    - i. do not detrimentally impact on the water resource or on another person's water use, property or land; and
    - ii. also not detrimental to the health and safety of the public in the vicinity of the activity.
  - 4.2 The natural migration patterns of biota and the sustainable ecological functioning of the watercourse system (up to the edge of the riparian zone or the 1:100 year floodline, whichever is the greatest) are not interfered with.
  - 4.3 Strict erosion control measures are to be taken during and after construction to ensure no erosion of the bed and banks of the water course take place.
5. Pg.32 of the BA report indicated that solid waste generated from the activity will be disposed of at the Weltevreden Landfill site, please adhere to the proposed disposal method and no solid waste should be disposed of on the open environment.
6. No sewer spill or any waste water should be allowed to overflow into the existing stormwater towards the Apex Dam, therefore the clean water should be separated from the dirty water.

Should you have any enquiries please contact James Mofokeng.

Yours sincerely



**Mr D MABADA**  
**Director: Proto-CMA**  
**Letter signed by Mr P Khwinana**  
**Date: 20/10/2023**



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