

Date: 10 March 2023

Dear registered Interested and Affected Party,

**BASIC ASSESSMENT (BA) PROCESS & WATER USE LICENSE APPLICATION
(WULA) FOR THE PROPOSED UPGRADE OF LEACHVILLE SEWER PUMP
STATION, ERF 374 OF LEACHVILLE TOWNSHIP, BRAKPAN, CITY OF
EKURHULENI, GAUTENG PROVINCE**

GDARD Ref. Gaut 002/22-23/E3249

Our notice of 1 July 2022 regarding the above-mentioned project refers.

We herewith bring to your attention that the City of Ekurhuleni Metropolitan Municipality (applicant) is proposing a change in the scope of works for the proposed upgrade of the existing Leachville Sewer Pump Station on Erf 374 at Leachville Township, next to the New Kleinfontein Road (M56) near Benoni town.

Instead of constructing a new pump station next to the existing one, the City of Ekurhuleni has decided to upgrade the existing pump station and extend the emergency pond. The scope of works will still include the formalisation of the access road and T-junction along the New Kleinfontein Road and the replacement of certain sewer midblock pipes in Leachville.

The legislative requirements remain unaffected i.e.

- An environmental authorisation is required in terms of the NEMA EIA Regulations of 2014 (GNR 326) from the Gauteng Department of Agriculture and Rural Development (GDARD) through Basic Assessment (BA) process.
- A Water Use License is required for Section 21 (c), (i) and (g) water uses triggered in terms of the National Water Act (Act 36/1998) (NWA) from the Gauteng Department of Water and Sanitation (DWS).

Please refer to the attached revised Background Information Document dated 10 March 2023 for more details. The revised/updated BID is presently available for review and submission of comments regarding the proposed project. If you wish to submit any additional comments based on the revised scope of works you have the opportunity to do so until 11 April 2023.

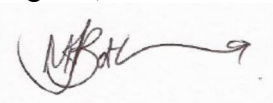
Registered I&APs are requested to please provide any additional comments together with their name, contact details and an indication of any direct business, financial, personal or other interest they have in the project to Marissa Botha (Naledzi) at botham@naledzi.co.za or contact us on 084-226-5584 for more information. Comments must be submitted on or before **11 April 2023**.

What's next?

All comments and issues received during the initial notification period and on the revised BID will be incorporated into an Issues and Response Report (IRR) and responded to. We will prepare a draft Basic Assessment Report and Environmental Management Programme (EMPr) which will be made available for public review for 30 calendar days. The IRR will be attached to the Draft BAR. The report and supporting documentation will be made available on the Naledzi website and at public venues. The details of these tasks will be communicated to I&APs via email.

Thank you for your participation.

Regards,



Marissa Botha (*Pr.Sci.Nat*)
Naledzi Environmental Consultants (Pty) Ltd
Southdown's Ridge Office Park, Ground Floor, C/o John Vorster &
Nellmapius Drive, Irene, Centurion, Gauteng, South Africa
Cell: 084 226 5584 (Marissa)
Email: botham@naledzi.co.za

NOTICE OF A BASIC ASSESSMENT PROCESS AND WATER USE LICENSE APPLICATION FOR THE UPGRADE OF LEACHVILLE X2 SEWER PUMP STATION, BRAKPAN, CITY OF EKURHULENI

REVISED BACKGROUND INFORMATION DOCUMENT (BID)

10 MARCH 2023



PURPOSE OF BID

During July 2022 Naledzi provided interested and affected parties (I&APs) with project information by means of a Background Information Document (BID) distributed via email and hand delivered in the project area. The BID has since been revised to accommodate a change in the project scope of works and is distributed to registered I&AP on the project database. The revised BID indicates how you can submit any additional comments you may have through the public participation process, and raise issues that may concern and/or interest you based on the revised scope of works. You can achieve this by:

- Reviewing the revised BID and completing the attached comment form (page 6)
- Contacting us i.e. email, telephone
- Giving comments within the given timeframe.

You can complete a comment form, write a letter, or call or email Naledzi if you wish to submit any additional comments for the project. **Comments must be submitted on or before 11 April 2023.**

CONTACT DETAILS

Contact: Marissa Botha
 Naledzi Environmental Consultants Pty Ltd
 Southdown's Ridge Office Park, Ground Floor,
 C/o John Vorster & Nellmapius Drive,
 Irene, Centurion
Tel: 084 226 5584
Email: botham@naledzi.co.za
www.naledzi.co.za

1. BACKGROUND

The City of Ekurhuleni Metropolitan Municipality proposes to upgrade the existing Leachville Extension 2 Sewer Pump Station situated on Erf 374 next to the New Kleinfontein Road (M56) adjacent to Leachville Township near Benoni in the jurisdiction of the City of Ekurhuleni.

The project requires environmental authorisation in terms of the National Environmental Management Act (Act 07/1998) and its promulgated EIA Regulations of 2014 (GNR 326) from the Gauteng Department of Agriculture and Rural Development (GDARD) before it can be commissioned. The application process is subject to a Basic Assessment (BA) process in line with Regulation 19 of the EIA Regulations.

A Water Use License Application (WULA) will also be required under the provision of the National Water Act 36 of 1998 (NWA) for Section 21 (c), (i) and (g) water uses. The application will be submitted to the Gauteng Department of Water & Sanitation (DWS) and will be subject to a WULA Procedure as set out in the NWA WULA Regulations of 2017 (GNR 267). Both application procedures are subject to a public participation process.

Naledzi Environmental Consultants (Pty) Ltd has been appointed by the City of Ekurhuleni's Design Engineers, Vumesa (Pty) Ltd, as the independent environmental assessment practitioner (EAP) to undertake the authorisation procedures, and will conduct the public participation process.

2. MOTIVATION AND PROJECT DETAILS

Leachville pump station currently services Leachville Township (Ext 2 and 3) and gravitates to the Vlakplaats and Waterval Wastewater Treatment Plants. The pump station has a design capacity of 22 litres / second but experiences high flows influenced by rainwater channelled to sewer manholes resulting in sewer overflows into two emergency ponds and onto the abutting property. To rectify the issue the City of Ekurhuleni wanted to build a new pump station next to the existing one. The scope of works was communicated to interested and affected parties during June 2022.

The municipality has since decided to upgrade the existing sewer pump station instead from a 22 litre/second to a 33 litre/second pump station to cater for the current and future demand and to ensure efficient daily operation of the pump station.

The revised scope of work will include:

- Upgrade the existing sewer pump station – Total area to be upgraded is estimated to be 600m² i.e.
 - Upgrade submersible pumps in the wet well and construct additional wet well 7m below ground
 - Raise the inlet manhole so there is no spillage within the pump station
 - Raise the levels of the underground infrastructure by 80mm
 - Install new mechanical screen
 - Construct security room and provide backup power
- Upgrade the emergency storage pond to contain an overspill volume of 181.5m³ (121m²)
- Formalisation of the existing access road to the pump station. i.e. Pave the road and increase current 4.85m width, redesign the T-junction with the New Kleinfontein Road.
- Replacement of certain 110mm sewer midblock pipes in Leachville Township with 160mm pipes to accommodate higher flows.

See Page 7-8 for Locality and Site Plan.

3. WHY IS AN ENVIRONMENTAL AUTHORISATION REQUIRED?

The project is situated within/close to a wetland and endangered ecosystem and therefore involves undertaking listed activities scheduled under GN R. 327 (activity 19) and GN R. 324 (activity 12 and 14) published under the NEMA EIA Regulations (GN R. 326, 7 April 2017). The environmental authorisation is required subject to a BA process for listed activities scheduled under GNR 327 and 324. The triggered activities and applicability to the project include:

Activity 19 (GNR 327) refers to infilling/removing/depositing any material of more than 10m² into/ from a watercourse. **The upgrading of the pump station will take place within a wetland and require the removal of 230m³ of unstable soil material to upgrade the pump station.**

Activity 12(c)(i)(ii) (GNR 324) refers to the clearance of an area of 300m² or more indigenous vegetation in (c) Gauteng (i.) Within any critical endangered or endangered ecosystem listed in terms of section 52 of NEMBA; (ii) Within Critical Biodiversity Areas or Ecological Support Areas (ESA) identified in the Gauteng Conservation Plan or bioregional plans. **The upgrading of the pump station and emergency pond will require the removal of more than 300m² of Tsakane Clay Grassland (threatened ecosystem) and falls within an ESA as identified in the Gauteng Conservation Plan vers. 3.3 and Ekurhuleni Bioregional Plan.**

Activity 14 (ii)(a)(c)(iv)(v) (GNR 324) refers to the development of infrastructure or structures with a physical footprint of 10m² or more which occurs within a watercourse in (c) Gauteng (iv) Sites identified as Critical Biodiversity Areas (CBA's) or Ecological Support Areas (ESA's) in the Gauteng Conservation Plan or in bioregional plans; (v) Sites identified within threatened ecosystems listed in terms of the National Environmental Management Biodiversity Act 10 of 2004 - **The pump station upgrade and associated infrastructure has a physical footprint of 600m², falls within a wetland in Gauteng, in an area identified as an ESA a threatened ecosystem (Tsakane Clay Grassland) in terms of the Gauteng Conservation Plan and NEMBA.**

See Page 9 for Photo Plate showing the site.

4. BASIC ASSESSMENT PROCESS

The BA process is a legislative tool used to identify the potential environmental impacts that may occur due to the project and to ensure that these are avoided or mitigated if environmental authorisation is granted. Its main purpose is to inform the competent authority and the public of the environmental consequences of the project through a BA Report and to recommend mitigation measures in an Environmental Management Programme to manage/avoid these. The process comprises the following basic steps (see Figure 1 for a basic illustration of the process):

- Site sensitivity verification, Specialist Studies
- Engage GDARD
- Provide I&APs opportunity to register on the project database and circulation of the BID
- Publicise the project in the local newspaper and place onsite notices
- Draft the Basic Assessment Report (BAR) and Environmental Management Programme (EMPr)
- Apply for environmental authorisation to the GDARD
- Release the draft BAR and EMPr to registered I&APs for 30 days of public review
- Update the BAR and EMPr based on I&AP comments and submit the final documents to GDARD
- GDARD will review the reports and decide on the application within 107 days.

The process will investigate and gather information about the application site and any potential negative environmental impacts through site investigations, desktop analysis and the use of tools such as Geographic Information Systems including specialist investigations to assess the site as well as information gathered from the public and relevant commenting authorities through the public participation process. The potential impacts will be assessed, ranked and recorded in the BAR and mitigation measures to minimise the negative impacts to acceptable levels recommended.

The EMPr will prescribe the environmental specifications to be adhered to during the construction and operation of the project. The BAR and EMPr will be subject to a 30- day public review before it is submitted to GDARD for decision-making.

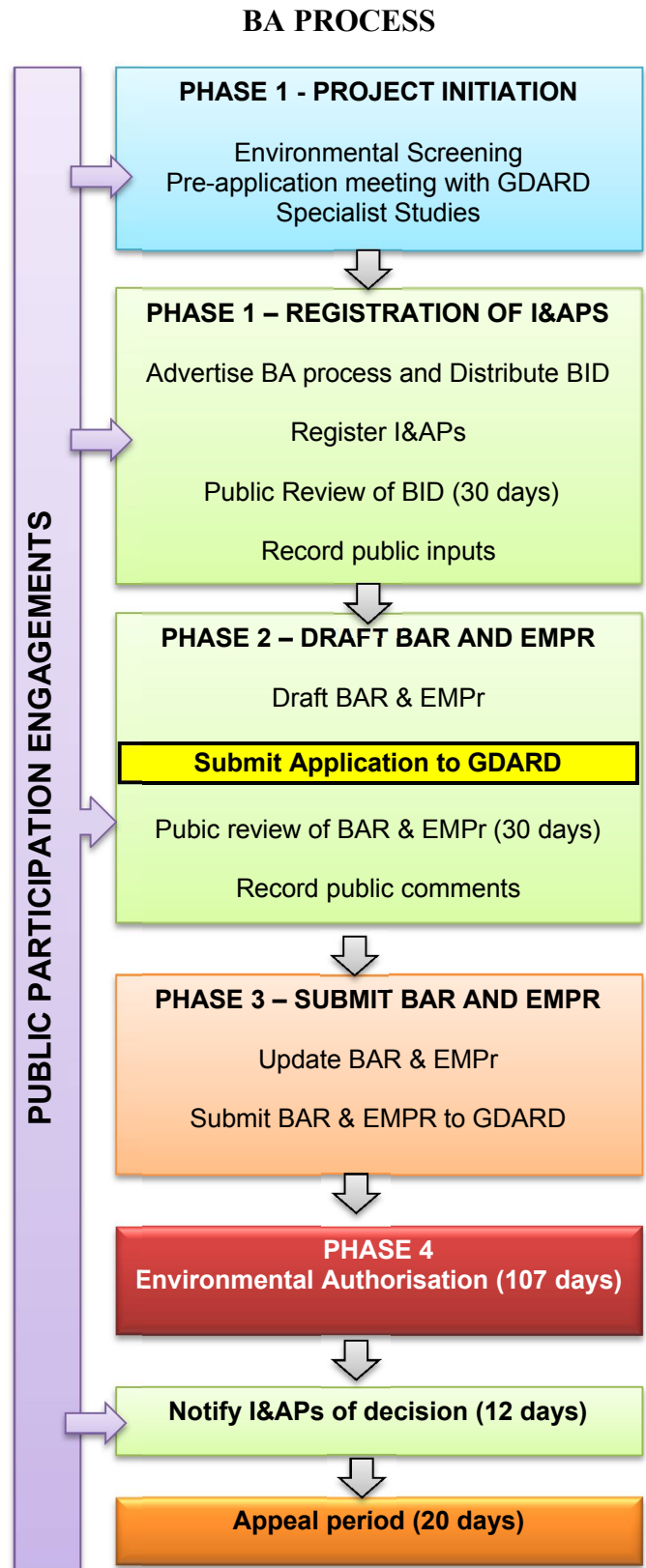


Figure 1: Basic BA Process flow diagram

5. WATER USE LICENSE APPLICATION

The new pump station site and road upgrade is situated within a wetland; the activities trigger Section 21 water uses defined in the NWA. A WULA will be required in terms of section 40 of the NWA. The application will be made to DWS: Gauteng Regional Office (Upper Vaal Water Management Area) for the following water uses:

- Section 21 (c) Impeding the flow of water in a watercourse (pump station site in a wetland)
- Section 21 (i) Altering the bed, banks, course or characteristics of a watercourse (pump station site in a wetland)
- Section 21 (g) disposing of waste in a manner which may detrimentally impact on a water resource.

The basic WULA procedure steps include:

- Pre-application engagement with DWS
- DWS site inspection
- Application submission to DWS
- Compile and submit a Water Use Technical Report to DWS
- DWS evaluation and assessment
- DWS issue decision (water use license)
- EAP inform the registered I&APs of the decision.

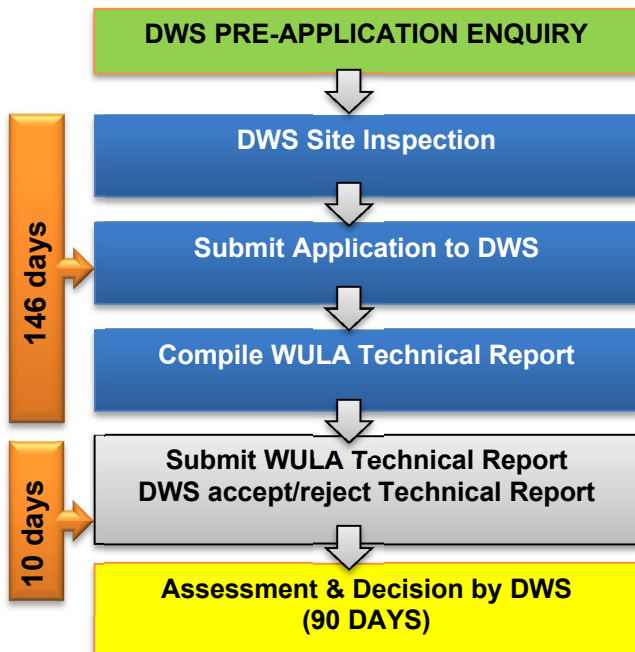


Figure 2: Basic WULA Procedure flow diagram

6. ENVIRONMENTAL SENSITIVITY AND SPECIALIST STUDIES

Based on the EAPs site verification, the below confirmed environmental sensitivity themes are considered applicable to the project site and require the below specialist investigation:

- Aquatic Biodiversity Sensitivity Theme because the site is situated within a wetland
- Terrestrial Biodiversity (animals, plants) because the site falls within:
 - An Ecological Support Area 1 in terms of the Gauteng Conservation Plan version 3.3 and 2012 Ekurhuleni Bioregional Plan;
 - The threatened ecosystem is the Tsakane Clay Grassland per the National List of Threatened Ecosystems.

Based on the above-confirmed themes the following specialist studies have been commissioned:

- Terrestrial Biodiversity Impact Assessment
- Aquatic biodiversity Assessment (Wetland Delineation)
- No Heritage Impact Assessment or Palaeontological Study will be commissioned for the project.

A walkthrough of the site was conducted on 9 June 2022 to screen the site for heritage resources and none were found to warrant a heritage study. The upgrading of the sewer pump station site is also 600m² and below the 5000m² activity threshold requiring a heritage impact assessment. Furthermore, the construction of the new pump station will not intrude into the bedrock where features of Palaeontological significance may be located.

The application site was also previously assessed for heritage resources by the City of Ekurhuleni in 2018 for the development of Leachville Ext 2. No heritage resources were found.

The South African Heritage Resources Agency (SAHRA) has also granted exemption for the project (Case ID: 18932).

7. PUBLIC PARTICIPATION PROCESS (PPP) PLAN

Public participation is a key requirement of the BA process and needs to be conducted in line with the NEMA EIA Regulations (Regulation 39-44). The PPP aims to engage I&APs and provide an opportunity for the expression of public views on the environmental impacts of the applications. All public issues and views on impacts are documented, addressed and responded to in the BA process and incorporated into environmental reports for consideration by GDARD and DWS. It is therefore important that relevant I&APs are identified and involved in the PPP from the beginning of the process to help focus the BA process plan.

7.1 PPP Plan - 1st Round - I&AP Registration, Circulation of BID for 30-day review and comment

Naledzi issued the project notice on 1 July 2022 in the Brakpan Herald and place onsite posters which called for the registration for I&APs until 30 July 2022. The original Background Information Document (BID) was also made available for a 30-day public review and comment period on the Naledzi website www.naledzi.co.za/publicdocuments. An I&AP Database was opened and maintained.

In January 2023 City of Ekurhuleni decided to change the scope of works, consequently, Naledzi has updated the project BID and is sending it as a direct notification to the I&APs already registered on the project database.

The BID is available for another 30-day public review and comment until 11 April 2023.

2nd Round – Release Draft BAR and EMPR for 30-day review and comment

The second round of consultation will entail the following:

- May 2023 - Newspaper advertisement in the Brakpan Herald local newspaper
- May 2023 - Emailing of notification letters to registered I&APs of the availability of the draft BAR and EMPR
- May to June 2023: Availability of BAR and EMPR for 30-day public review and comment on the Naledzi website;
- September 2022 - Site Inspection with GDARD and DWS

I&APs will be informed of the GDARD decision by email and have an opportunity to review a copy of the decision.

Invitation to Register as an I&AP

The revised/updated BID is presently available for review and submission of comments regarding the proposed project. If you wish to submit any additional comments based on the revised scope of works you have the opportunity to do so until 11 April 2023.

Registered I&APs are requested to please provide any additional comments together with their name, contact details and an indication of any direct business, financial, personal or other interest which they have in the application, to the **contact person provided on page 1**, within the specified period. The preferred method of communication is either by telephone or email correspondence, which will allow tracking of submissions.



Figure 3: Google Earth Satellite imagery showing the location of the existing Leachville Ext 2 sewer pump station



Figure 4: Google Earth Satellite Imagery showing a close up of the sewer pump station site (blue), emergency pond (green), road upgrade (black) and midblock pipes to be replaced (pink line). The majority of the pipes to be replaced are located within a road reserve and an urban area.

