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ATTENTION: CALGRO M3 DEVELOPMENT & EP3 ENVIRONMENTAL PTY (LTD) c/o EBEN VAN SCHALKWYK & KATLEGO PULE (PR.PIN) & CITY OF JOHANNESBURG

OBJECTION TO THE AMENDMENT OF THE EXISTING SOUTH HILLS ENVIRONMENTAL AUTHORISATION FOR THE SOUTH HILLS MIXED-USE DEVELOPMENT LOCATED ON PORTIONS 65 AND 300 (PORTION 7) OF THE FARM KLIPRIVERSBERG NUMBER 106 IR, CITY OF JOHANNESBURG METROPOLITAN MUNICIPALITY, GAUTENG, AS WELL AS SOUTH HILL EXTENSION 8 (PORTION 304 OF THE FARM OF KLIPRIVERSBERG NUMBER 106 – IR – REFERENCE NO 01-12189/3

The following information relates to the publication of EP3 Environmental amendment Application Notice dated 21.02.2022. Which addresses three proposed amendments

1. The layout of the approved development
2. A proposed increase in the number of units within the existing approved footprint from 5161 units to 7364 units; and
3. Development of a new updated Environmental Management Programme.

1 AND 2. LAYOUT OF THE APPROVED DEVELOPMENT and PROPOSED INCREASE IN NUMBER OF UNITS

In the context of this objection, term “footprint” translates into the human mark or physical demands and impacts that people will make on this site / area.

The topographical layout of Phase Two remains unchanged. What has changed is the number of units proposed. Based on Calgo’s estimation of 5 people per unit 32 000 people will be housed.

This proposed increase in the total number of units from 5 161 (25 805 people) to 7 364 units on this site is 2 203 units (36 820 people). A conservative estimate of the proposed increase in occupancy would be 11 015 people. Phase One currently conservatively houses around 5 327 people and the current infrastructure is stretched beyond all limits. It is not currently coping with the consumption demands of the area.

Phase Two amendment aims to place an additional 21 000 people on a strip of land on East Street, The Hill.

STRATEGIC PLANNING CONCERNS

Phase One has visibly demonstrated that the project was not carried out in consultation with all other interested and affected Local Municipality Departments. It did not include Provincial and National Departments. CalgoM3 did nothing to prevent the silo approach adopted with costly results, service delivery problems; resident protests and personal costs; and unnecessary wastage of Municipality financial and human resources.

What has been planned, carried out, and budgeted for to prevent another recurrence?

FAILED DEVELOPMENT ISSUES WITH PHASE ONE

Calgro M3's and Johannesburg Municipality's claim in 2014 of the development carrying out "the major upgrading of bulk infrastructure such as water, sewer, roads and intersections are being implemented in the area as direct result of the project" has simply not been implemented.

- Water supply interruptions keep increasing due to poor infrastructure, inadequate planning and capacity, inappropriate license volume requirements and overall system maintenance.
- Serious problems with Rand Water who cannot maintain a water supply to Meyersdal and South Hills Tower.
- Residents now have to regularly have public protests at South Hills Reservoir and Rand Water offices before supply is restored.
- Water tanks have to be brought into the area – at a cost to the Council and rate payers.
- People have to walk long distances to trucks – which may or may not be there, at the time, and then carry heavy buckets home and get them up the stairs.
- This is a health risk. No personal hygiene. No cooking, no laundry. Overflowing toilets – followed by blocked drains which have to be repaired.
- Schools, the elderly and old age homes cannot cope.
- Businesses are forced to close.

Water Supply failures

1. 11 days – 03.07.2021 – 13.07.2021
2. 9 days – 24.08.2021 – 01.09.2021
3. 6 days – 09.03.2022 – 14.03.2022

CRIME AND SECURITY ISSUES

High density living brings high crime and criminals with it. This is documented by Statistics SA figures and SAPS reports.

Moffat View Police Station staff compliment – there is presently a total Staff compliment of 139 made up of 25 admin staff and 114 SAPS officers, there are presently only about 30 vehicles in total available. The majority of the fleet is in workshops for repairs. The supposed ideal SAP staff requirement is around 1: 400 citizens. Therefore, the increased staff complement would require an additional 95 officers excluding the existing shortfall. The Moffatview SAPS policing precinct is made up of 36 suburbs, the largest and most problematic being Rosettenville, the Moffatview SAPS precinct comprises mostly lower socio-economic groups with high unemployment and undocumented immigrant numbers; the crimes are made up of Drug dealing, gang activity,

prostitution, Human trafficking, and armed criminals, as we most recently witnessed In the huge shootout between heavily armed criminals and the SAPS were 8 criminals were shot and law enforcement officers who were injured on the 21-02-2022.

Repeated requests from SAPS and the public for upgrading since 2014 have gone unheeded and ignored. It is impossible to expect them to reach, address and control the currently escalating crime.

The open area in the river gorge currently houses criminals, stolen goods; is a plastic burn-off haven for stolen copper cable; and is completely hidden from view. Moffat Park SAPS does not have the resources, support or equipment to even enter this area, let alone control it – and the crime continues to escalate.

The proposed amendment markedly increases this problem – exponentially. It also places the new residents at considerable risk!

CHILD CARE, SCHOOLS, ECDS AND AFTER CARE FACILITIES

We have to presume there will be a large number of children on this property. There is no planning which indicates their safety, security and education will be reasonably supported and resourced.

For an objective appraisal we need to look at the numerous infrastructure problems already exacerbated by Phase One of the development – “unveiled” in November 2018. Acknowledgment of some of these is evidenced in the visit to Phase One by the then Mayor In the context of this objection, the term “footprint” translates into the human mark or physical demands and impacts that people will make on this site. However, service delivery impacts are compounding. Promises undertaken by CalgroM3 and Johannesburg have not been met. Now, we are going to try and proceed, regardless of critical issues that have not been addressed. Compounding a known existing problem and making it even worse!

ROADS, TRAFFIC, TRANSPORT

The narrow single-lane road is currently poorly maintained. Has any study been done to identify and deal with the increased traffic? How much has been budgeted for upgrades and will the money be made available **before** the build starts?

When thinking about transport to school and work where is it envisaged that taxis will be loading and unloading passengers. In Phase One the area at the South Hills Reservoir was taken over as a taxi rank and off-**peak parking** area. No toilets, no water, street hawkers and kitchens sprang up; major litter and noise (boom boxes) and alcohol consumption. Pedestrians were subjected to petty crime, mugging and theft; and had to be repeatedly cleared by JMPD.

BUILDING OCCUPANCY REGULATIONS AND HEALTH AND SAFETY

The National Building Regulations and Standards Act and SANS Fire Codes stipulate minimum square meter requirements for domestic dwellings. Total space must be at least 30 sq.m and a bedroom can be as small as 6 sq.m. How did Calgro calculate the square metres that would be allocated to these occupants? History shows that there is always overcrowding in dwellings in areas with high unemployment and/or low incomes. With 5 people calculated to occupy 7 364 units, what do Calgro and Johannesburg Municipality calculate the real occupancy will be?

Are we moving people from shacks to overcrowded and under resourced dwellings just so that government can claim to have given them a brick-and-mortar structure? Is ongoing overcrowding “dignified”? Will it create self-esteem and self-respect?

HEALTH AND WELFARE

Are local medical, hospital, and primary health care facilities aware of; being financially resourced and equipped with staff, finance, and equipment to handle this increase in traffic and medical needs?

South Rand Hospital and local Clinics are already in a shocking state with poor maintenance, broken systems, and staff issues overstretched- without adding an additional 38 000+ people to their service demands.

Health access is a basic human right but delivery is already lacking in this area.

JOBURG CITY COUNCIL UNDERTAKING AND LACK OF POST-INVESTIGATION ACTION

The City of Johannesburg Mayor, Jolidee Matongo, announced an **independent investigation** into the quality of the South Hills mixed housing development's **workmanship is to be launched on September 5, 2021.**

The announcement came after the mayor, accompanied by Gauteng Cooperative Governance and Traditional Affairs (Cogta) MEC Lebogang Maile, conducted an oversight visit at the housing development following a recent protest by its beneficiaries.

The beneficiaries complained about poor workmanship on the development that has resulted in their flats suffering from cracked and damp walls and ongoing plumbing-related leaks. They also frequently go without water and electricity for days.

Both the MEC and Matongo **committed to continuing monitoring** the South Hills development on behalf of its beneficiaries to ensure all the ongoing concerns raised are attended to and accountability is demonstrated.

"If the issue is on the side of provision of water and electricity, we will also certainly correct as a matter of urgency the ongoing concerns of the residents," said the mayor.

CALGRO M3'S PUBLISHED UNDERTAKING IN 2014

"Construction of the upgrade of existing bulk and link infrastructure as well as Internal township infrastructure commenced end of 2014. To date in excess of R121 million has been invested to upgrade various bulk, link, and internal infrastructure. The project is being implemented in two major phases with various sub-phases."

"The South Hills project will have a positive impact on the local community due to various upliftment initiatives will be undertaken by Calgro M3".

"Infrastructure such as roads, water, sewer, reticulation and stormwater facilities"

"Various green initiatives and energy-saving technologies such as gas for water heating (geysers) and cooking, solar water heaters, heat pumps, improved insulation, etc are being implemented. Recycling projects, food gardening, and urban greening initiatives are currently also being investigated to be implemented within the project." Southern Courier November 11, 2014.

The change in the plan has not changed in the area. Therefore, the extra units will be built upward – 3 / 4 storeys high.

The additional units will increase the number of proposed occupants from 25 000 to 38 000 people when completed.

Impacts on existing community/area include

- Road infrastructure – single lane = won't cope with traffic.
- Taxis, Uber drivers, Bolt, and other cars will increase in enormous daily traffic numbers. Owners' cars adding to it.
- Taxis – drop off / loading places and maybe "waiting" ranks/parking lots in off-peak hours.
- Critical - Water infrastructure – already total inadequate with multiple system breakdowns and days and days of outages.

- Rand Water cannot currently meet capacity demands due to aged, poorly maintained, and inadequate storage and capacity systems
- Childcare. Schools, ECDs etc – where are they. Existing facilities cannot cope with such a big influx to the area. Already overcrowded with poor student outcomes.
- Crime – Moffat SAPS totally overwhelmed already – cannot cope with current staff, vehicle, and financial resources.
- Health and welfare. South Rand Hospital is in very poor condition and under-resourced. Same for Primary health care clinics.

The promises from Calgro M3 and Johannesburg Municipality to deal with all these issues before Phase 1 was built were not met! Protests have been held since 2018. No action was taken.

Now they want to expand the problem and more than double the impacts.

This cannot be regarded as a Calgro project. Joburg Municipality needs to develop a co-ordinated plan – with all Municipal and local Govt Departments. It's a Municipality community project. Each must identify the effect on the – budgets and human resources – and then re-evaluate the whole development project. It can go ahead in stages. As the resources are available and all depts have their part in place – then we can move forward. You cannot develop and then try and fix what's missing for service delivery for existing and new community members.

3 DEVELOPMENT OF A NEW UPDATED ENVIRONMENTAL MANAGEMENT PROGRAMME.

In 2014 several groups submitted objections to the Environmental Impact Assessment Report prepared by David Hoare Consultants and LEAP environment. We evidenced that the Red Line Plants (*Khadia beswickii*) were incorrectly and inadequately addressed. This is now acknowledged and Calgro has hired EP3 to re-do the assessment. This objection – 13 pages plus Addendums - are not included here. Suffice to say that all this work has been done and commented on in 2014 and it appears that we are now back to where we were in 2014.

CONCLUSION

There are multiple objections to multiple issues attached to and/or arising from the Johannesburg Municipality's acceptance of the EP3 Amendment Application.

We propose that a Municipality, National, and Provincial assessment is completed, documented, and published before any approval is given to this amendment.

Failing to do so is going to result in an unnecessary ripple effect on existing communities in the area; service delivery failures; and result in financial costs and wastage as we get further down the line.

This is not about an Environmental Management Programme. This **whole development project** is about the wellbeing of existing and new communities. It is a critical Johannesburg Municipality's responsibility to address this project through an integrated and inter-departmental assessment and consolidation of efficient and effective community development and service delivery.

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