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Dear Herman

## **CITY OF JOHANNESBURG: REVIEW OF METROPOLITAN SPATIAL DEVELOPMENT FRAMEWORK AND REGIONAL SPATIAL DEVELOPMENT FRAMEWORKS: 2010-11**

The establishment of the Klipriviersberg Conservancy was initiated in 2008 with an Inaugural Meeting held on Wednesday, 19 November 2008 to launch the Interim Constitution and Interim Executive Committee. Since then extensive consultations with members of the authorities, the business community and residents has brought the Conservancy to the point where it will be holding an Inaugural Annual General Meeting on Tuesday, 13 April 2010 at which a final constitution will be adopted.

The purpose of this submission is to provide information regarding the need for an environmentally based integrated development of southern areas of Johannesburg included within the area of the Klipriviersberg Conservancy by providing some background information regarding the Conservancy and commenting on the Spatial Development Framework (SDF) and Regional Spatial Development Frameworks (RSDF) relevant to the area of the Conservancy.

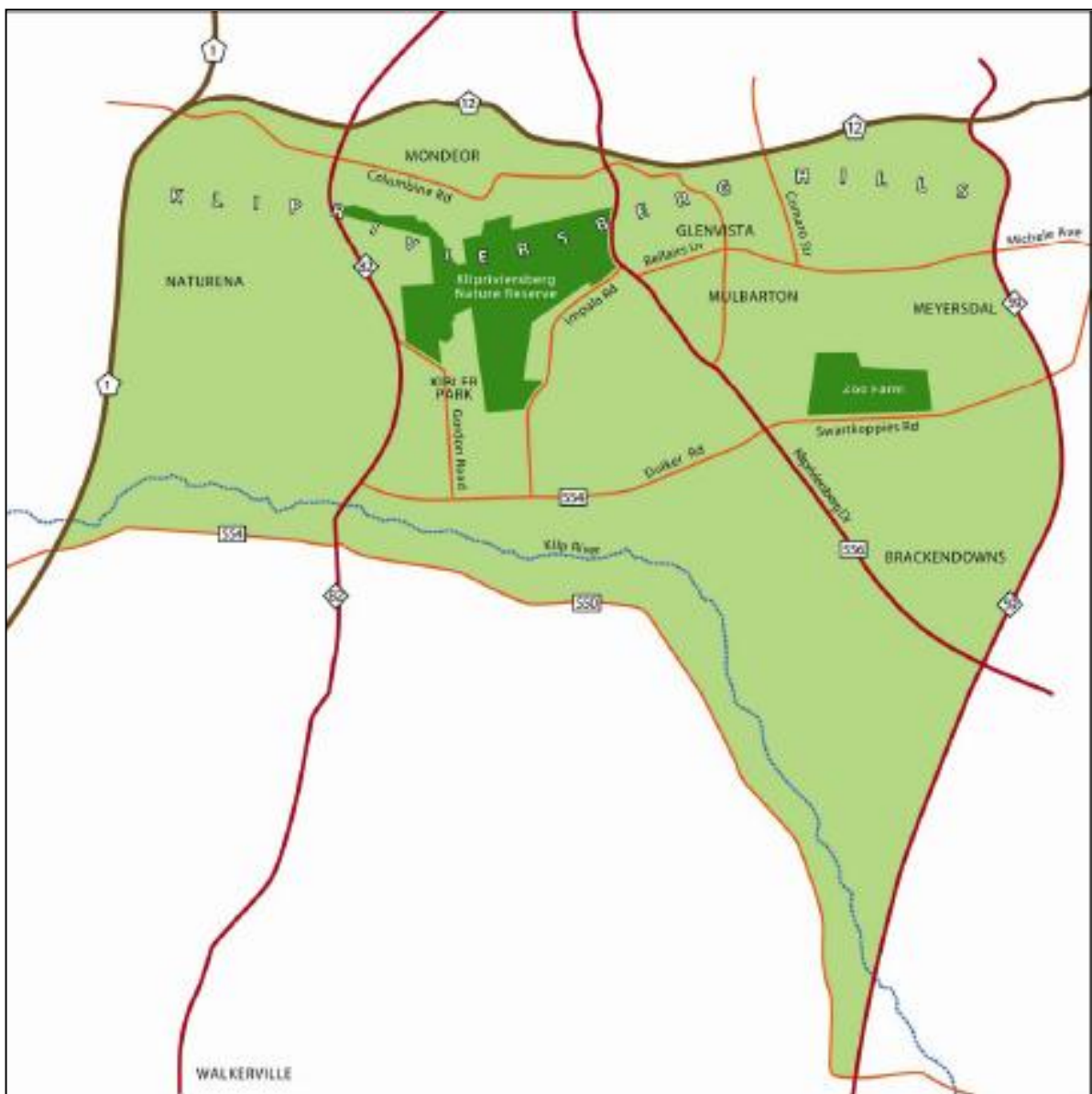
## 1. Background information regarding the Klipriviersberg Conservancy

The southern areas of Johannesburg, the western extremity of Ekurhuleni and the northern extremity of Midvaal, include large open tracts of unspoilt land stretching from the Klipriviersberg Range of hills in the north to the Klip River further south.

The area is rich in natural resources, varying from the beautifully wooded Klipriviersberg range of hills, to grasslands and wetlands and to prolific birdlife along the Klip River, a tributary of the Vaal. It contains red data species as well as numerous heritage sites, such as the ruins of the dwellings of Sotho/Tswana people who lived there 300 and more years ago, an old Voortrekker farmstead, Boer war fortifications and sites of interest from the gold rush days.

The borders of the Conservancy are determined by the N12 highway to the north, the R59 highway to the east, the R550 and R554 to the south and the N1 highway to the west. The area of the Conservancy is approximately 150 square kilometres. A plan showing the extent of the Conservancy is shown in Figure 1.

**Figure 1: Klipriviersberg Conservancy Core Area**



The Klipriviersberg Nature Reserve, 680 hectares in extent and the largest proclaimed nature reserve in Johannesburg, lies at the centre of the area. The Reserve, in which a variety of game roams freely, is an urban conservation jewel.

The wider area of the Conservancy surrounding and protecting the Reserve has considerable biodiversity value as well as tourism, recreational, cultural, educational and developmental potential, but needs proper and careful environmental management and protection from untoward development.

With the above in mind, landowners and residents in the area have established the Klipriviersberg Conservancy as a voluntary association with the purpose of protecting, promoting and enhancing the natural biodiversity value of the area.

In terms of its constitution, the aims and objectives of the Klipriviersberg Conservancy include:

1. Protect, promote and enhance the biodiversity of the area and to retain its natural beauty.
2. Encourage landowners, residents and all other stakeholders in the area to be environmentally aware and to embrace the practice and principles of sustainability and sustainable urban living.
3. Assist and cooperate with local, provincial and national government regarding biodiversity, sustainability, management of natural resources, sustainable social and economic development and job creation within the area.
4. Raise awareness in the community of the environmental, social and economic opportunities of the area based on the value of its natural environmental resources.
5. Guide and encourage suitable and appropriate social and economic development that supports sustainability, attracts tourism and furthers job creation.
6. Establish a mutually beneficial relationship between property development and conservation.
7. Assist in preserving heritage, archaeological and historical sites within the area.
8. Liaise and cooperate with a wider network of similar conservation areas and organisations for mutual growth and development.

Gauteng Department of Agricultural and Rural Development (GDARD) has allocated an interim registration number for the Conservancy being GCA062

With respect to the Johannesburg area, the Conservancy lies in portions of Wards 23 and 54 of Region F and Ward 24 in Region D.

It encompasses the following Sub Areas:

Region D: Sub Area 13 to the east of the Ni Highway

Region F: Sub Areas 34, 35, 36, 37, 38 and 39.

The location of the Conservancy at the centre of Gauteng provides an opportunity for promoting tourism, recreational and sporting activities focusing on the natural and physical environmental attributes of the area to communities and tourists ranging from adjacent areas in Soweto, Johannesburg, Ekurhuleni and Midvaal through to the rest of Gauteng, South Africa and internationally.

It has been suggested that if the natural and physical assets are managed and promoted correctly, the Conservancy could become an important "playground" contributing to environmental, economic and social development of the local communities and address unemployment and poverty alleviation by capitalising on the matchless tourism, recreational and sporting opportunities.

## **2. Development Integration and Environmental Management**

While the importance of the natural environment and assets is recognised and the necessity to protect and manage the significant biodiversity, physical and cultural resources is appreciated, it is also important to promote appropriate spatial and economic development from which mutual benefit and opportunities can be derived for the communities, municipalities and the region as a whole.

The Conservancy recognises and endorses the current Urban Development Boundaries as established by Gauteng Province and each of the municipalities. The related urban development management policies will be important in ensuring the protection and enhancement of the area and particularly the natural assets.

Within Johannesburg, the designation of major portions of the Conservancy area as Peri-Urban is therefore supported. It is therefore strongly recommended that every effort be made to ensure compliance by private and public sector developers with the development management strategies, objectives, policies and conditions of the Johannesburg Growth Management Strategy for such areas to ensure the protection and enhancement of the natural environment and assets.

Another important priority is to establish working relationships with authorities and developers that will realise added value to the natural and environmental assets of the Klipriviersberg ridges, Klip River and grassland areas.

It is considered important that the Klipriviersberg Conservancy be recognised as a key component of the Johannesburg SOJO tourism, recreation and sporting development loop. In this way appropriate development can be managed and guided to support the realisation of economic and social benefits while promoting and enhancing the unique environmental attributes of the area.

It is suggested that the aim and objectives of the Klipriviersberg Conservancy are also aligned to supporting environmental, spatial, economic and social development as set out in the Midvaal Local Municipality IDP and its stated vision, strategic objectives and associated programs.

With respect to Ekurhuleni, the recently completed Environmental Management Framework (EMF) and Ekurhuleni Biodiversity and Open Space Strategy (EBOSS) provide strong guidelines and directions for the protection of important areas of the Klipriviersberg ridges.

Of particular importance is the introduction of the Biodiversity Stewardship Program by the Gauteng Department of Agriculture and Rural Development (GDARD). This program is currently being initiated through discussion with major stakeholders.

In view of this, it is the intention of the Conservancy that there is an opportunity for the establishment of a partnership between each of the municipal councils, provincial authorities and the Klipriviersberg Conservancy. This partnership can be used for realising shared aims and objectives regarding the environmental, spatial, economic and social development of the area. This partnership should also counter the unsustainable and exploitative use of resources and preserve and protect the natural resources and sensitive environmental areas.

Furthermore, it is suggested that this partnership would benefit by being recognised through the Inter-Governmental Relationship structures and strategies to assist in effectively coordinating, aligning and integrating the three municipalities and Province with respect to environmental management and urban development in this area to contribute to the realisation of the Gauteng Global City Region.

The Klipriviersberg Conservancy supports the need for the Johannesburg Environmental Management Sector to engage with provincial authorities as it is an opportunity for the development and implementation of the ideas and concepts regarding conservancies and their role in assisting authorities with respect to the management of development in environmentally sensitive areas. In addition, the Conservancy will be able to support the implementation of key programs especially with

respect to the Klipriviersberg ridges, Klip River, wetland, biodiversity and grassland management and addressing alien vegetation issues.

### **3. Klipriviersberg Conservancy Management Framework**

The major project for the Conservancy over the past year has been the development and preparation of a Management Framework. An extensive consultative process was followed involving provincial and municipal politicians and officials, business representatives and residential and community groupings in a series of workshops which was used to develop an overarching strategic focus for the Management Framework. It has also be used to identify priorities for projects and interventions. Further consultative processes are being used for developing implementation and action plans based on the strategic framework and priorities.

The key elements of the framework include:

- Establish Constitution
- Catalyse Projects
- Share Information
- Grow Membership
- Establish partnerships
- Integrate Urban Development
- Establish Enviro Centre
- Secure Resources
- Establish Brand
- Integrate Business development
- Support special stakeholders

### **4. Comment on the SDF**

#### **4.1. Section 2: GDS & Provincial Initiatives**

##### **Gauteng Global City Region (GGCR)**

Consideration should be given to a further building block for the GGCR being the establishment of a Gauteng Environmental Management Framework (EMF) to ensure the coordination and integration of environmental and biodiversity management in the region.

To date a number of EMFs have been prepared in Gauteng, such as the north-western areas of Johannesburg and Ekurhuleni which should form the basis on which additional EMFs are prepared. In this regard, the preparation of an EMF for Johannesburg will greatly assist in the integration of spatial, environmental and transportation planning, management and enforcement.

An area where such an environmental management tool is of critical need is the southern areas of Johannesburg where private and public development initiatives are increasing in number and intensity and threatening the environmental biodiversity of the area. In turn, this will impact on the social and economic development of the area which is being based on its natural environment through initiatives such as the Sojo Development Loop.

##### **Cross Border Hot Spot: Environmental**

The Klipriviersberg ridges are noted as a cross-border issue with Ekurhuleni. With the establishment of the Klipriviersberg Conservancy in the area it is suggested that this cross-border issue should also include Midvaal with the grassland and Klip River wetland areas also being considered.

While it is recognised that there are intergovernmental structures that exist, it is proposed that a specific task team be established involving the provincial and local authorities, Klipriviersberg conservancy and representatives of appropriate business (e.g. SOJO), community and NGO/CBO (e.g. WESSA) organisations and landowners to establish a strong public private partnership which will coordinate and manage the protection of the sensitive areas in a strong and consistent fashion.

The idea of a task team involving all the authorities was suggested to the Conservancy by the MMC Environment at Ekurhuleni during consultation that was undertaken in the preparation and formulation of the Management Framework.

The importance of the environment in the southern areas of Johannesburg has been identified in the environmental and spatial evaluations of the metropolitan area. It is considered important that a proactive intervention be established that coordinates the various authorities, agencies and organisations in ensuring that only appropriate and suitable development is undertaken which will not be detrimental to the environmental and biodiversity value of the area but will protect, promote and enhance its unique and special qualities.

It is strongly recommended that the GDARD Biodiversity Stewardship Program, which is in line with the national Biodiversity Stewardship Africa (BSSA) initiative which supports the National Protected Area Expansion Strategy (NAPES) be incorporated into the spatial and environmental aspects of development management throughout the Metropolitan area but with specific relevance and application in the Peri Urban Areas as identified in the GMS.

It is proposed that the formulation and implementation of this programme should form a focus of the above-mentioned task team for discussion during the coming year with a view to incorporating and implementing in the 2011/12 SDF/RSDf cycle.

### **Proposed Provincial Road Network**

There are a number of provincial routes currently being planned and considered throughout the area of the Conservancy. We would request that a traffic and transportation strategy and network be investigated by the City in close liaison with the national and provincial roads authorities to establish the need for the different routes and to reconsider some of the alignments which affect particularly sensitive and biodiversity valuable areas.

#### **4.2. Table 5.24: Environmentally Sensitive Areas per Region**

The following corrections and amendments are suggested for Region F:

- Egoli Grassland: the Conservancy understands that there are important areas of Egoli Grassland in the Klipriviersberg and the Klipriver valley. This should be confirmed with reference to the Gauteng Grasslands Project which identified the Klip River (2174ha) and Klipriviersberg Nature Reserve (644ha) as two of the twelve biodiversity priority grassland sites in Gauteng
- Wetlands: The edge of the Oliphantsvlei wetlands are located in this region. However, the bulk of this area lies in Region D

## **5. Comment on Region D RSDf**

### **5.1. 3.1.6 Environmental Management**

The north western corner of the Klipriviersberg Conservancy lies within the section of Region D located to the east of the N1 and south of the N12 including the Naturena Ridges.

It is requested that the Klipriviersberg Conservancy be recognised as a key stakeholder and the initiatives detailed under Region F in this submission be incorporated into Region D where appropriate.

## **5.2. Sub Areas 1 & 13**

The Main Witwatersrand Ridge Policy should be included as a development policy in this region to protect the Klipriviersberg and other ridges in the area.

## **6. Comment on Region F RSDF**

### **6.1. Threat to extensive areas from public development initiatives**

In view of the development potential in the southern areas of Johannesburg there are a number of development initiatives which are being considered by the private and public sectors.

Of particular note are the investigations and plans being prepared by Joburg City Property Company for the development of Aspen Extension 7, Rietvlei Zoo Farm, Moffat Park and the area known as the "Southern Farms" which lies outside the UDB. It is the contention of the Conservancy that the priority and a focus of the intended development is totally insensitive to the extensive analysis of the areas of land and their identified biodiversity value.

It is of great concern that the City is spending large amounts of money investigating development proposals which effectively are contrary to its own approved development management policies and strategies.

In addition, it would appear that the developments are being driven by profit and political based motivations which are overriding sound urban development and environmental management policies and principles.

The question of promoting sustainable development which addresses existing community needs through the development of public land for community facilities such as schools and clinics would appear to be a low priority. From discussions and meetings it would appear that the preference is to provide accommodation for as many people as possible and provide the least required facilities for the incoming communities only and ignore the needs and shortfalls of existing receiving communities.

It is also suggested that consideration be given to the development and implementation of a funding and financial model which could lead to an ongoing generation of revenue for the City to use in providing and sustaining facilities and services for the local communities. It is of concern that such valuable assets are simply disposed of to developers for a single lump sum considerations when with careful thinking and engagement with stakeholders an "annuity development" could be established.

### **6.2. Table 5.4: Environmental Sustainability**

It is suggested that one of the Development Objectives and guidelines should consider the implementation of the Biodiversity Stewardship Program being developed by GDARD where areas of particular biodiversity sensitivity and value had been identified.

This should be included in the Development Management Tables for the Sub Areas affected by the Conservancy namely, Sub Areas 34, 35, 36, 37, 38 and 39

### **6.3. Recognition of the Klipriviersberg Conservancy as a key stakeholder**

We would also request that the Conservancy is recognised as a stakeholder in development processes and applications falling within Sub Areas 34, 35, 36, 37, 38 and 39.

The Conservancy therefore requests that a suitable guideline clause be included within the Development Management Tables for the respective Sub Areas that the Klipriviersberg Conservancy should be recognised as a key stakeholder and approached regarding developments in the area.

### **6.4. Sub Area 35**

There are no development guidelines for the area located to the west of the Vereeniging Road (R82).

It is suggested that Sub Area 38 Development Objective 1 should be suitably modified for this area.

### **6.5. Sub Area 36**

There are no development guidelines for the area located between the Vereeniging Road (R82) and the Klipriviersberg Nature Reserve.

It is suggested that Sub Area 38 Development Objective 1 should be suitably modified for this area.

### **6.6. Sub Area 37**

The boundary for the Panorama node is incorrectly shown on the Plan No 47 for this Sub Area

### **6.7. Sub Area 39**

There are no development guidelines for the area located on either side of the Vereeniging Road (R82).

It is suggested that Sub Area 38 Development Objective 1 should be suitably modified for this area.

The reference to the Three Koppies and Rietvlei Zoo Farm are not relevant to this Sub Area.

### **Eikenhof Tourism and Recreational Node**

In discussions and meetings held through the year by Sojo and the Klipriviersberg Conservancy with landowners and businesses in the Eikenhof area the idea of developing the area as a special node has been suggested.

The essence of this node would lie in the business and economic opportunities arising from upgrading existing hotels, recreation facilities, conference centres and similar uses that already exist and which could be extended and added to.

We would support the possibility of this special node forming the basis of further discussions with the City and the landowners in the area to explore the possibilities of preparing a suitable development framework which would assist developers and investors with appropriate guidelines and policies.

We look forward to receiving your response to this submission and to initiating a meaningful working relationship regarding the environmental, spatial, economic and social development in the southern areas of Johannesburg.

Please contact us should you require any further information or clarification regarding any of the points made in this submission.

Yours sincerely

A handwritten signature in black ink, appearing to read "Andrew Barker". The signature is fluid and cursive, with a large loop at the end.

**ANDREW CW BARKER**  
**Chairman**  
**Interim Executive Committee**  
**Klipriviersberg Conservancy**