

9 May 2008

Mr P. Roux
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Dear Mr Roux

RE NORTHGATE DEVELOPMENT

I have the following concerns about the Northgate development:

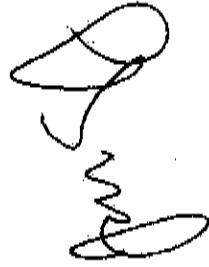
- Locating the Northgate housing development in a greenfields area adjacent to the Kamfers Dam and within its catchment area would have greater environmental impacts than using a previously disturbed site or another site not likely to impact on a sensitive natural environment. Kamfers Dam is a proclaimed Natural Heritage Site of high biodiversity and conservation value, and an Important Bird Area of international significance which supports many waterbird species including, at times, about 60,000 Lesser Flamingos. Kamfers Dam is now the first breeding site for the globally threatened Lesser Flamingo in South Africa, only the fourth breeding site in Africa and the sixth in the world. The avifauna specialist study for the EIA stated that any impacts on Kamfers Dam would be at a national scale as it is an Important Bird Area and Natural Heritage Site. In addition, the study stated that any impacts on the Lesser Flamingo population would be of international significance and even with all mitigating measures in place there will be low impacts and residual impacts at a national and international scale. In contrast, proceeding with the Northgate housing development on a disturbed site, or site with a lower conservation or biodiversity value and thus impacting at a local scale would cause less environmental harm.
- Valid alternative sites were not assessed in the draft EIA even though this was requested by various interested and affected parties. Developing Northgate to the west or east of Kimberley in areas already zoned for residential enhancement and within the urban edge in the Sol Plaatje Municipality's Spatial Development Framework (SDF) would lead to sustainable environmental development. This would also be legally compliant in terms of the SDF. The SDF is a mandatory document forming the foundation of a municipality's IDP; all

planning decisions on development applications must be based on the extent that the application conforms with and gives effect to the SDF. The IDP binds a municipality in exercising its executive authority. In the SDF, more than half of the proposed Northgate area falls within the Kamfers Dam Flamingo Conservancy Area and the rest of the area is zoned for support tourism and hospitality for the Kamfers Dam conservancy. The area is not zoned for residential and business development. Why has the municipality disregarded the SDF and approved the rezoning of the area to residential and business for the Northgate development, even before the EIA has been completed?

- The EIA indicates that this project would contribute significantly to the much needed sustainable economic and social development in Kimberley. However, it is our opinion that the Northgate development should not be approved for this site, but should proceed at an alternative site based on the following facts: (1) this proposed development is being applied for in areas not zoned for residential or business but for conservation, tourism and hospitality according to the SDF; (2) it has major mitigating measures that will need to be implemented at significant cost and with no guaranteed outcome; (3) the necessary and costly upgrades to the sewage and electricity bulk services supply, which are already over capacity; (4) the biodiversity offset required; and (5) the potential long-term impacts on the Kamfers Dam ecosystem.
- We believe that the most appropriate use of this land would be as a conservation buffer zone within a protected area around Kamfers Dam to protect this sensitive natural asset of local and international importance.

Please include this letter in the final EIA report.

Yours sincerely,



Dan Sonnenberg

cc Mrs R. Hlongwane
Department of Tourism, Environment and Conservation, Northern Cape