



Flamingo Environmental Trust

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19 May 2008

Mr Peter Roux
Turgis Consulting
Kimberley 8300

Dear Mr Roux

NORTHGATE PROPERTY DEVELOPMENT: COMMENTS ON EIA

Herewith our comments on the proposed Northgate development.

1. The Flamingo Environmental Trust has supplied comments on the scoping report. Some of these comments have not been adequately addressed. These are:
 - 1.1 Various biodiversity offsets are proposed by Northgate. Some of these proposed “offsets” (e.g. perimeter wall, electric fencing and security camera, contributory relationship with the FET) are not true biodiversity offsets as it does not really compensate for the potential harm to the biodiversity, especially the flamingos of Kamfers Dam. Proper biodiversity offsets must be identified and investigated during the EIA process. Such offsets could possibly include the construction of a second flamingo breeding island.
 - 1.2 Some of the proposed financial “offsets” are allocated to the FET without any prior discussions. The FET feels uncomfortable with this situation and may not want to accept some of these “offsets” (e.g. the management of a general Eco Centre not located at Kamfers Dam) as it falls outside of the main objectives of the FET. It must be stressed that an Eco Centre is not seen as biodiversity offset or even a mitigation measure. The FET may also not be able to take on the protection of the flamingos on private property (through the appointment of wardens) as it will be dependent on agreements with the landowner.
 - 1.3 Note that to our knowledge the wetland’s name is spelt as “Kamfers Dam” and not “Kamfersdam”.
 - 1.4 Who will be responsible for the long-term maintenance of the security wall?

- 1.5 Who will be responsible for managing security, especially access to Kamfers Dam, through the security camera monitoring system?
- 1.6 There should be a thorough assessment of alternative development sites. A housing development of this scale may be more appropriate at another less sensitive area within the urban edge. The only alternatives investigated in the EIA are related to technology, scale and design/layout.
2. A serious concern regarding the location of the Northgate development is that it does not fall within a residential development area as identified in the Sol Plaatje Municipality's draft SDF. More than half of the area is outside the urban edge and is zoned for conservation, while the rest is within an area zoned to support hospitality and tourism for the conservation zone. The proposed development must be discussed clearly within the context of the SDF, which is presently a limiting factor. The limitations imposed by the SDF necessitate the evaluation of alternative sites for development. FET also maintains that another housing development of this magnitude in the catchment area of Kamfers Dam is inappropriate and that the area should be used to support the Kamfers Dam Conservancy, with possible future extension to the Vaal River.
3. Kamfers Dam is now the only breeding locality for Lesser Flamingos in South Africa. It is also a registered Natural Heritage Site and is an Important Bird Area. This makes it a site of international importance. None of the impacts on Kamfers Dam as identified in the EIA (e.g. biophysical) could therefore only have local impacts. Any negative impacts on the flamingos will be of national and international importance.
4. Flamingos disperse and return from/to Kamfers Dam mostly at night. What influence would a new huge light source in close proximity to the pan have on the navigational potential of the flamingos?
5. Kamfers Dam is part of the Highveld Salt Pan vegetation type (Mucina and Rutherford 2006) and must be discussed in that context and not within the context of the Kimberley Thornveld within which it broadly falls.
6. Please confirm that Northern Cape Property Investment Holders is the owner of the property. If not, it must be stated so in the final EIA.
7. The Forestry Act on p. 12 should read National Forests Act.

8. Water drains from the property to Kamfers Dam in an easterly and not westerly direction. Earthen dams will be constructed in the drainage line to control storm water run-off. No indication is given of the size and design of these dams. In addition, no indication is given of any contingency plans should a potential pollutant disaster occur within the development site with the possibility of pollutants entering Kamfers Dam via the drainage line.
9. Under the section *Land tenure and capability* (p.78) it is stated that the change in land use of the proposed development site will be beneficial as it is too small for commercial farming purposes and will contribute to job creation. This statement was made in isolation of the positive contribution that the land could possibly make towards support for the Kamfers Dam Conservancy as stipulated in the draft SDF. It is our contention that the contribution of the site as a buffer for Kamfers Dam and a possible habitat corridor for various biota should be investigated.
10. In the EMP it is suggested that mammals and birds should be regularly monitored? Monitoring should be conducted for specific reasons. What are the reasons?
11. No layout plans for the proposed development are appended to the document. It should be appended to the final EIA to ensure that the layout is sufficient and conforms to the written text.

Yours sincerely

Mr Julius Koen (Chairperson)