



**PROPOSED NEW TOWNSHIP DEVELOPMENT ON PORTION 16 OF FARM 48,
GROBLERSHOOP, !KHEIS LOCAL MUNICIPALITY, NORTHERN CAPE**

APPLICANT: !Kheis Local Municipality

COMMENT AND RESPONSE REPORT

(DENC Ref. No: NC/EIA/13/ZFM/!KHE/GRO1/2020)

No.	Comment Date, Comment Format, Organisation/I&AP	Comment	Response from EAP/Applicant/Specialist/Project Manager
Comments Received on Initial Public Participation Process			
1	Date: 17/06/2020 Format: Email Letter I&AP: Gariiep Watch (Chairman: Mr Ferdie Botha/ Technical Advisor: Mr Fritz Bekker)	<p>Gariiep Watch is a civic society organisation that endeavours to protect the lower Orange River through effective monitoring and data collection, improved communication by role-players and the enhancement of public participation.</p> <p>We noted your abovementioned NEMA Public Participation Process (Ref. 0512) for a new township development at Topline, with much concern.</p>	<p>Respondent: EAP</p> <p>Noted. Thanks for your comment.</p>
		<p>Gariiep Watch performs quarterly water quality studies and a risk assessment procedure at various localities in the lower Orange River including the river reach flowing through the !Kheis Local Municipalities jurisdiction. Our water quality results show that a number of point and diffuse sources of sewerage pollution may be affecting the surface and ground water resources in the vicinity of these townships and beyond. Furthermore, recent site visits to sewerage water infrastructure at these !Kheis townships showed that much of the sewerage water infrastructure is not being maintained or used for it intended purpose. Pump stations to the oxidation dam systems are not working, sewerage infrastructure is being vandalized, oxidation dam linings are damaged or removed and raw sewerage is being disposed into the veld or towards dry water courses.</p>	<p>Respondent: EAP</p> <p>Noted, issues relating to the water quality and sewage infrastructure will be addressed in the Environmental Impact Report (EIR). A Freshwater Assessment, and Engineering Report detailing services infrastructure, will be included in the EIR.</p>

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		<p>The photographs in Figure 1 show some of the oxidation dam systems encountered at !Kheis Local Municipality during 2019.</p>  <p>Figure 1: Oxidation dam systems at !Kheis Local Municipality (2019)</p> <p>The extension of existing townships that already have inadequate, unmaintained or unused sewerage infrastructure will only aggravate their pollution risk towards the downstream environment.</p> <p>We therefore object to any new township development in the !Kheis Local Municipality and request the following information:</p> <ol style="list-style-type: none"> 1. A list of all new proposed township developments in the !Kheis Local Municipality where EnviroAfrica CC is the appointed environmental practitioner. 2. Details pertaining to new sewerage infrastructure that are planned for these developments. <p>Please also register Gariep Watch as an I&AP for these new township developments.</p>	<p>1. Requested information has been sent to the I&AP.</p> <p>2. Noted, this will be addressed in the EIR. An Engineering Report detailing services infrastructure, will be included in the EIR.</p> <p>Noted, Gariep Watch has been registered as an I&AP.</p>

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Respondent: !Kheis Local Municipality Response on Initial PP (Appendix 1E.6)			
<p>!Kheis Municipality exercises its executive functions within its boundaries in terms of Section 151 of the Constitution of the Republic of South Africa as a local authority. As such the Constitution enjoins the Municipality to adhere to the objectives in accordance with Section 152 and the development within its boundaries in terms of Section 153.</p> <p>The Municipality must exercise its rights and duties in terms of Section 4 of the Municipal Systems Act 32 of 2000 to ensure that the communities are consulted properly and that the needs are addressed. To fulfil these obligations the Municipality consulted the community annually to compile the master strategic plan (Integrated Development Plan).</p> <p>The need for housing within the Municipality is currently critical and needs to be addressed. Some of the applicants are on a waiting list for a house since 2013. It is essential to ensure that these people on the backlog list be assisted to restore dignity and fulfil the obligations as a local authority. The consolidated respond of !Kheis Municipality on the comments from various individuals and organizations on the housing projects are as follows:</p> <ol style="list-style-type: none"> 1. The purpose of the whole exercise is to obtain correct information from professionals to address the shortcomings and comply with legislation to render basic services to our communities. 2. That this Council adhere to the call of its poor residents to avail land for housing purpose. 3. The Technical reports will address the needs and will serve as business plans to obtain financial support from Government institutions. 4. To obey to the course of restoring dignity to poor people and correct the imbalances of the past. 			
Comments Received on Draft Scoping Report			
2	<p>Date: 9th August 2020 Format: Email Letter I&AP:</p>	<ol style="list-style-type: none"> 1. Graag verwys ek u na die skrywe ontvang van EnviroAfrica gedateer 15 Mei 2020. 2. Hierdie dokument bevestig !Kheis munisipaliteit se voorneme om 'n woonbuurt to ontwikkel direk langs die abattoir. 3. Graag verwys ek u na die meegaande lugfoto aangeheg. 4. Die impak op die abattoir gaan aansienlik wees veral op die volgende areas; <ul style="list-style-type: none"> - Infrastruktuur - Veiligheid 5. As maatskappy is dit egter noodsaaklik da tons moet focus op samewerking en die uitbou van ons gemeenskap en dorp se behoeftes. 6. Daarom steun ons die ontwikkeling maar wil graag die volgende versoek tot u rig. 7. Neem ook kennis da tons as grootste enkel werkgewer in die bedieningsarea van !Kheis Munisipaliteitir gebuk gaan onder geweldige finansiële druk. 8. Tans moet ons koste sny waar ons kan om die aflegging van personeel te voorkom. 	<p>Respondent: !Kheis Local Municipality</p> <p>REQUEST TO INVESTIGATE THE ABATTOIR ON PROPOSED LAND DEVELOPMENT FOR HOUSING IN GROBLERSHOOP.</p> <p>The above-mentioned and the instruction from Barzani to conduct a safety investigation on the local abattoir bears reference.</p> <ol style="list-style-type: none"> 1. The issue of the dumping water dams was previously discussed with the management of the abattoir. 2. Due to a previous agreement to replace these dams, it was now agreed that it will form part of the new town outlay. 3. Surely it will not hamper the proposed new township establishment as the dams will shift to a safer place within the Spatial Development Framework.

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		<p>9. Voorts moet ons meeding teenoor die De Aar Abattoir tak van die maatskappy tov operasionele kostes. Indien ons kostes op Groblershoop buitensporing gaan raak, sal ons die abattoir op Groblershoop moet sluit en voortgaan op die De Aar Abattoir weens die finansiële implikasie van toenemende uitgawes.</p> <p>10. Tans geen die abattoir aan 188 werknemers permanente werk en skep vir n werdere 15 per week tydelike werk.</p> <p>11. Uit hierdie oogpunt versoek ons asb u hulp en ondersteuning t.o.v. die volgende versoek.</p> <p>12. Met die ontwikkeling van die nuwe woonbuurt gaan ons bestaande pensmisdamme in die ontwikkelingsone val.</p> <p>13. Dit sluit die drie damme en ook toevoerlyn in (Aangedui in groen).</p> <p>14. Hierdie area is toegestaan aan die abattoir in Junie 1993 deur Groblershoop Munisipaliteit as deel van die ontwikkeling van die abattoir.</p> <p>15. Ons versoek is dat ons die damme kan skuif na direk after die abattoir soos aangedui met die blou driehoek.</p> <p>16. Die oppervlakte benodig is sowat 3 hektaar.</p> <p>17. Tog sien ons ook die voordeel in die skuif tot voordeel van !Kheis Munisipaliteit en ook die kleinvee boere in die aandrensende area agter die voorgestel ontwikkelingsarea.</p> <p>18. Ons is van oordeel dat ons in samewerking met u en ander rolspelers die area kan ontwikkel en omskakel na aangeplante weiding vir diere.</p> <p>19. In kort kan gekyk word na bespreoing uit die damme vir aangeplante weiding tot voordeel van die kleinvee boere.</p> <p>20. Graag versoek ons dus !Kheis Munisipaliteit om die grond aan ons op 'n langtermyn gebruik ooreenkoms beskikbaar te stel vir die ontwikkeling.</p> <p>21. Dankie vir die geleentheid om hierdie aansoek aan u voor te hou.</p> <p>22. U terugvoer sal hoog op prys gestel word.</p> <p><i>(Please see Appendix 1E.3.2 for comment translated to English. Please note that the English translation was not approved by the registered I&AP who submitted this initial comment).</i></p>	<p>4. Attached is the communication from the abattoir to emphasize the willingness and desire to assist with the best suitable solution.</p>
3	<p>Date: 28th August 2020 Format: Email Letter I&AP: Gariiep Watch (Mr Fritz Bekker)</p>	<p>Interim Comment</p> <p>SAHRA requires the draft EIA documents before further comments can be issued.</p>	<p>Respondent: EAP</p> <p>Noted, thank you. The draft EIR will be made available to SAHRA for comment.</p>

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		Should you have any further queries, please contact the designated official using the case number quoted above in the case header.	
4	<p>Date: 22nd September 2020</p> <p>Format: Email Letter</p> <p>I&AP: Gariiep Watch (Mr Fritz Bekker)</p>	<p>The July 2020 EnviroAfrica draft Scoping Report and Plan of Study for the above-mentioned development at Groblershoop has reference.</p> <p>Thank you for registering Gariiep Watch as an Interested and Affected Party and incorporating our correspondence of 17 June 2020 in the draft Scoping Report. This letter highlighted our concerns that pertain to the lack of wastewater infrastructure and maintenance of existing wastewater infrastructure at the !Kheis local municipality.</p> <p>We agree that housing is necessary to promote socioeconomic development and to provide the basic needs of the Groblershoop community. However, the process of urbanization and population growth, if not handled carefully, may result in increased surface and ground water pollution towards the Orange River. Intensive urban growth far from job opportunities can also lead to greater poverty with local governments unable to provide services for all people.</p> <p>Our comments pertaining to this application are as follows:</p> <p>1. Aerial photographs clearly show that the proposed site encompasses a drainage line beginning on its western perimeter close to the airstrip and exiting the site via a culvert underneath the road towards the Orange River (Plate 1). The fact that there is a culvert show the need for stormwater conveyance. i.e. the presence of a drainage line.</p> <p>This natural watercourse is separate from the two artificial wetlands as identified in Part 5.3 of the draft Scoping Report, which are impoundments associated with the neighbouring abattoir. We therefore do not agree with the statement that there are no natural watercourses/drainage lines in the development area.</p>	<p>Respondent: EAP</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. A Freshwater Impact Assessment will be included in the draft Environmental Impact Report (EIR). This Assessment will identify drainage lines and sub-catchment regions.</p> <p>Noted. The Freshwater Impact Assessment will be included in the draft EIR, which will address the presence of watercourses associated with the proposed development footprint.</p>

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		 <p data-bbox="517 871 1218 895">Figure 1. Drainage line and culvert in proposed development area</p>	
		<p data-bbox="517 932 1285 1007">2. We generally see no problem with the proposed development site but believe that the layout could be tailored to exclude sensitive drainage lines, corridors or riparian zones.</p>	<p data-bbox="1310 932 2063 1007">Noted. Alternative layouts, incorporating environmentally sensitive areas (including watercourses identified by the Freshwater Specialist), will be included, and addressed in the draft EIR.</p>
		<p data-bbox="517 1016 1285 1203">3. It was noted during a previous site visit that sewerage is being disposed of into the veld on this proposed site. Growth of Phragmites reeds point towards disposal areas. This practice indicates an existing problem pertaining to wastewater management at Groblershoop. The development of 1500 new erven on 95 hectares will aggravate this situation if new infrastructure is not professionally designed, constructed and maintained.</p>	<p data-bbox="1310 1016 2078 1203">Noted. The Engineering Services Report, prepared by Bvi Consulting Engineers, will address the current state of the Wastewater Treatment Works (WWTW) and make recommendations relative to the future demand associated with the proposed development. A Botanical Impact Assessment and Freshwater Impact Assessment, as well as a Heritage Impact Assessment, will be included in the draft EIR which will be made available for comment to all registered I&APs.</p>
		<p data-bbox="517 1212 1285 1318">4. Ground water quality down-slope from the proposed development and the existing settlement should be investigated. It is believed that, in the absence of adequate wastewater services at Groblershoop, much sub-surface pollution may reach neighbouring boreholes.</p>	<p data-bbox="1310 1212 2078 1339">Noted. The Engineering Services Report, prepared by Bvi Consulting Engineers, will address the current state of the Wastewater Treatment Works (WWTW) and make recommendations relative to the future demand associated with the proposed development. A Botanical Impact Assessment and Freshwater Impact Assessment, as well as a Heritage</p>

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		<p>These boreholes are being used for irrigation, livestock watering and potable purposes and may pose a risk to public health.</p>	<p>Impact Assessment, will be included in the draft EIR which will be made available for comment to all registered I&APs.</p>
		<p>5. It is stated in Part 6.5 of the draft Scoping Report that refuse removal will be via the existing municipal waste stream. Solid waste management is a major problem at the Groblershoop settlement, especially south of the existing settlement and east of the proposed new development area. This entire area is littered with glass, plastic and chemicals that may cause water pollution. A licenced municipal waste disposal facility should be developed to cater for any new development before it is undertaken.</p>	<p>Noted. Illegal dumping was noted during the site visit. Illegal dumping will be addressed in the draft EIR. Mitigation measures regarding waste management will be addressed in the draft EIR and will also include recommendations made by Specialists.</p>
		<p>6. It will be necessary to perform a biodiversity assessment as the proposed site is situated within the Northern Cape Critical Biodiversity Area (CBA). The existing culvert underneath the N10 may currently serve as a corridor linking biodiversity from the Bushman Arid Grassland to the Lower Gariep Alluvial vegetation types. This existing corridor and drainage line cannot be used by people that move between the old and proposed new Groblershoop settlements. New road bridges or safe crossings over the N10 will have to be constructed to enable people to safely cross the road and still allow the biodiversity corridor to function.</p>	<p>Noted. A Botanical Impact Assessment will be included in the draft EIR. The Botanical Assessment will address various factors including biodiversity connectivity, centre of endemism, and presence of protected plant species.</p>
		<p>7. Detailed biomonitoring as proposed in Part 7.2 of the draft Scoping Report will be excessive and resources should be focussed on solid waste, stormwater, groundwater and wastewater management. River health indices will not be feasible on the ephemeral drainage lines but could be conducted in the Orange River up-stream and down-stream from the proposed development.</p> <p>All necessary measures must be put in place to prevent any pollution from reaching the Orange River.</p>	<p>Noted. The Engineering Services Report, prepared by Bvi Consulting Engineers, will address the current state of sewerage infrastructure, water supply, and waste management. The Services Report, along with the Freshwater Specialist Recommendations and mitigation measures made by the Freshwater Report (including recommendations and mitigation measures made by the Specialist) will be incorporated into the draft EIR.</p> <p>Noted. Mitigation measures, as per the Specialist Reports (Botanical Assessment, Freshwater Assessment, and Heritage Assessment) and the EMPr will be made available for comment to registered I&APs and the competent authority (DENC) along with the Draft EIR.</p>