




PROPOSED TOWNSHIP DEVELOPMENT ON PLOT 2627 AND ERF 131, GROOTDRINK, !KHEIS LOCAL MUNICIPALITY

APPLICANT: !Kheis Local Municipality

COMMENT AND RESPONSE REPORT

(DENC Ref. No: NC/EIA/14/ZFM/!KHE/GRO2/2020)

No.	Comment Date, Comment Format, Organisation/I&AP	Comment	Response from EAP/Applicant/Specialist/Project Manager <i>Please note: All registered I&APs will be given the opportunity to comment on the draft EIR.</i>
Comments Received on Initial Public Participation			
1	Date: 17/06/2020 Format: Email Letter I&AP: Gariep Watch (Chairman: Mr Ferdie Botha/ Technical Advisor: Mr Fritz Bekker)	Gariep 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. We noted your abovementioned NEMA Public Participation Process (Ref. 0512) for a new township development at Topline, with much concern.	Respondent: EAP Noted. Thanks for your comment.
		Gariep 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 its 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.	Respondent: EAP 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.

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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>	<ol style="list-style-type: none"> 1. Requested information has been sent to the I&AP. 2. Noted, this will be addressed in the EIR. An Engineering Report detailing services infrastructure, will be included in the EIR. <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.4)			
<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. 			
Comment Received on Draft Scoping Report			
2	Date: 28 th August 2020 Format: Email Letter I&AP: SAHRA	<p>Interim Comment</p> <p>SAHRA requires the draft EIA documents before further comments can be issued.</p> <p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p>	<p>Respondent: EAP</p> <p>Noted, thank you. The draft EIR will be made available to SAHRA for comment.</p>
3	Date: 1 st October 2020 Format: Email Letter I&AP: Gariiep Watch (Chairman: Mr Ferdie Botha/ Technical Advisor: Mr Fritz Bekker)	<p>The July 2020 EnviroAfrica draft Scoping Report and Plan of Study for the above-mentioned development at Grootdrink has reference.</p> <p>Thank you for registering Gariiep Watch as an Interested and Affected Party and incorporating our correspondence of 17 June 2020 into 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>Respondent: EAP</p> <p>Noted.</p> <p>Noted.</p>

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		<p>We agree that housing is necessary to promote socioeconomic development and to provide the basic needs of the Groblershoop community.</p> <p>Our comments pertaining to this application for Grootdrink are as follows:</p> <p>1. The proposed extension of the Grootdrink settlement will interfere with two well-defined drainage lines that flow directly into the Orange River. Although the identification of site alternatives may not be feasible as noted in the Scoping Report, layout alternatives should be considered especially since the development will be within a Critical Biodiversity Area.</p> <p>The drainage line to the north of Grootdrink on Erf 2627 could be avoided completely without the loss of much development potential. We therefore believe that the layout could be tailored to exclude sensitive drainage lines, corridors or riparian zones.</p> <p>2. The system of oxidation dams just west of Grootdrink was recently investigated by Gariép Watch. The infrastructure is in disrepair with fences removed, buildings vandalized, and oxidation dam linings stolen. These oxidation dams have been fitted with an impermeable lining for a reason, which is to prevent sub-surface seepage of sewerage water from polluting groundwater resources and the Orange River.</p> <p>The development of 370 new erven on 36 hectares at Grootdrink will increase the potential for surface and groundwater pollution if appropriate wastewater infrastructure is not professionally designed, constructed and maintained.</p> <p>Aspects pertaining to solid waste, stormwater, groundwater, and wastewater management should be key components of the Environmental Impact Assessment.</p>	<p>Noted.</p> <p>1. Noted. Although site alternatives are not feasible (due to various factors such as surrounding land-use, proposed connection to existing services, etc.), layout alternatives will be addressed and included in the Environmental Impact Report (EIR). These alternatives will address environmentally sensitive areas, as identified by the Botanical, Freshwater, and Heritage Specialists.</p> <p>2. Noted. The Engineering Services Report, prepared by Bvi Consulting Engineers, will address the current state of the Wastewater Treatment Works (WWTWs) and make recommendations relative to the expected increase in demand for such services. The Services Report will also address solid waste management, water supply, and status of electrical supply. 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>