




PROPOSED TOWNSHIP DEVELOPMENT ON ERF 1, ERF 16, ERF 87 AND PLOT 2777, TOPLINE, !KHEIS LOCAL MUNICIPALITY

APPLICANT: !Kheis Local Municipality

COMMENT AND RESPONSE REPORT

(DENC Ref. No: NC/EIA/09/ZFM/!KHE/TOP1/2020)

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: 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, The Municipality (Applicant) and/or planners will address service delivery in the EIR. An Engineering Report detailing services infrastructure, will also 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.5)			
<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	Date: 28 th August 2020 Format: Email Letter I&AP: SAHRA	Interim Comment SAHRA requires the draft EIA documents before further comments can be issued. Should you have any further queries, please contact the designated official using the case number quoted above in the case header.	Respondent: EAP Noted, thank you. The draft EIR will be made available to SAHRA for comment.
3	Date: 22 nd September 2020 Format: Email Letter I&AP: Gariiep Watch	The July 2020 EnviroAfrica draft Scoping Report and Plan of Study for the above-mentioned development of 248 erven on 36 ha at Topline has reference. 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.	Respondent: EAP Noted. Noted. Noted.

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		<p>We agree that housing is necessary to promote socioeconomic development and to provide the basic needs of the Topline 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 for Topline are as follows:</p> <p>1. The proposed extension of the Topline 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. The drainage line on Erf 1 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 existing oxidation pond system situated to the south-west of the Topline development area is in disrepair. It is uncertain where the wastewater is disposed of but not inconceivable that it is discharged into the veld nearby where ground- and surface water resources can become polluted. This aspect should be investigated as part of the impending EIA.</p> <p>3. It is recommended that specialist botanical studies should be performed as part of the EIA to delineate the two watercourses and its associated vegetation. A ground water investigation should also be performed as part of the freshwater impact assessment. 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>Aspects pertaining to solid waste, stormwater, groundwater and wastewater management should be key components of the Environmental Impact Assessment.</p> <p>The Orange River is used for many purposes downstream from this development, including the potable use by communities, often directly</p>	<p>1. Noted. Alternative layouts, incorporating environmentally sensitive areas (including watercourses identified by the Freshwater Specialist), will be included, and addressed in the draft EIR. A Botanical, Freshwater, and Heritage Assessment will address environmentally sensitive areas of the proposed site for development and will be included in the draft Environmental Impact Report (EIR).</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. 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>3. Noted. Botanical, Freshwater, and Heritage Specialist Studies will be included in the draft EIR. These Specialist studies will identify any environmentally sensitive areas (such as watercourses) associated with the proposed site earmarked for development. Water quality will be addressed in the Freshwater Impact Assessment.</p> <p>Noted. These aspects will be addressed within the Engineer's Services Report which will be included in the draft EIR.</p> <p>Noted. Mitigation measures and recommendations proposed by the Specialists will be included and addressed in the EIR (and in particular the Environmental Management Programme, EMPr).</p>

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		from the river and without treatment. All necessary measures must be put in place to prevent any pollution from reaching the Orange River.	