



Gariep Watch

P.O. Box 2536, Upington, 8801

22 September 2020

EnviroAfrica CC
P.O. Box 5367
Helderberg
7135

ATTENTION: MR. CLINTON GEYSER

COMMENTS ON THE DRAFT ENVIRONMENTAL SCOPING REPORT: TOWNSHIP DEVELOPMENT ON ERF 1, ERF 87 AND PLOT 2777; TOPLINE: !KHEIS LOCAL MUNICIPALITY

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 Gariep 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.

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.

Our comments pertaining to this application for Topline are as follows:

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.
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.
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.



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Aspects pertaining to solid waste, stormwater, groundwater and wastewater management should be key components of the Environmental Impact Assessment.

The Orange River is used for many purposes downstream from this development, including the potable use by communities, often directly from the river and without treatment. All necessary measures must be put in place to prevent any pollution from reaching the Orange River.

Please feel free to contact Gariep Watch if there are any questions or queries.

Yours sincerely

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