



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 PORTION 16 OF FARM NO. 48, GROBLERSHOOP: !KHEIS LOCAL MUNICIPALITY

The July 2020 EnviroAfrica draft Scoping Report and Plan of Study for the above-mentioned development at Groblershoop 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 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.

Our comments pertaining to this application are as follows:

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.

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.



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Plate 1: Drainage line and culvert in proposed development area

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.

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.

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.

These boreholes are being used for irrigation, livestock watering and potable purposes and may pose a risk to public health.



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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.

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.

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.

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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