




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	<p>Date: 17/06/2020 Format: Email Letter I&AP: Gariiep Watch (Chairman: Mr Ferdie Botha/ Technical Advisor: Mr Fritz Bekker)</p>	<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>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. Thanks for your comment.</p> <hr/> <p>Respondent: EAP</p> <p>Noted. Current water supply, sewage and solid waste management capacities and issues have been identified and detailed in the Engineer's Services Report (Appendix 4B). Construction and upgrades to existing sewage management infrastructure has been recommended by the Engineer to service the proposed development.</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. 	<ol style="list-style-type: none"> 1. Requested information has been sent to the I&AP. 2. Noted. The total sewer flow was calculated at 272 000l/day. Thirty (30%) of the households are currently serviced by VIPs whereas sixty (60%) of households utilize toilets with a conservancy tank (maintained by municipal waste trucks). Should a full-borne sewerage system be required, the associated infrastructure will include a pumpstation (which must be capable of delivering 23.4l/s to the WWTW), rising main pipeline (new 200m diameter Class 6 PVC pipelines (2100m and 3100m), and oxidation ponds (with a capacity of 0.3MI/ day). It is recommended that the existing WWTW

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		Please also register Gariep Watch as an I&AP for these new township developments.	be relocated due to its current close proximity to the existing Topline Settlement. Noted, Gariep Watch has been registered as an I&AP.
Respondent: !Kheis Local Municipality Response on initial PP (Appendix 1E.5)			
!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.			
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).			
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:			
<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: Gariep 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.	Respondent: EAP Noted, thank you for your comment.

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		<p>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.</p> <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><u>Our comments pertaining to this application for Topline are as follows:</u></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>Noted. Please refer to the Engineer's Services Report (Appendix 4B) stipulating recommended sewage infrastructure construction / upgrades to service the proposed development.</p> <p>Noted. As per the EMPr (Appendix H), the construction of the proposed development must comply with conditions stipulated in the EMPr, Specialist Reports, and the EA (if granted). This aids in avoiding, mitigation, and / or rehabilitating impacts (in accordance with the Mitigation Hierarchy) identified by the Specialists, EAP, and/ or I&APs.</p> <p>1. Noted. Alternative design layouts, incorporating environmentally sensitive areas (including watercourses and botanical features as identified by the Freshwater Specialist and Botanical Specialist, respectively), have been appended as Appendices 2A-D. Design Alternative 4 (Appendix 2D) is the preferred layout and incorporates the aforementioned drainage lines – zoning these areas as Open Space II and Open Space III. Therefore, this mitigates impacts associated with the proposed housing development in close proximity to the identified watercourses.</p> <p>2. Noted. The Engineer's Services Report (Appendix 4B) has identified the capacities of existing services (<i>viz</i> – water supply, sewage management, solid waste removal, electricity supply, roads, and stormwater management) and has proposed recommendations for the servicing of the proposed Topline Housing Development.</p> <p>3. Noted. A Botanical (Appendix 6A), Heritage Impact Assessment (Appendix 6B), Freshwater Impact Assessment (Appendix 6C), and Geotechnical Investigation (Appendix 6D) have been conducted. Moreover, watercourses present within the proposed development footprint are non-perennial watercourses which are mostly dry throughout the year. The Freshwater Impact Assessment (Appendix 6C) includes biomonitoring of the Orange River at different sampling points. As per the Freshwater Assessment, biomonitoring was conducted at eleven (11) sampling points along the Lower Orange River, namely Augrabies Lair</p>

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		<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 from the river and without treatment. All necessary measures must be put in place to prevent any pollution from reaching the Orange River.</p>	<p>trust, Groblershoop, Kakamas Triple D, Hopetown Sewer, Hopetown Sewer, Keimoes Housing, Upington Erf 323, Upington Affinity, Styerkraal, Grootdrink Bridge, and Turksvy Dam. These sites were sampled based on elucidating the combined impact of the proposed developments on the Orange River. Biomonitoring was carried out according to the description of Dickens and Graham, (2002). Impacts on the Orange River, associated with the proposed development, have been included in the Freshwater Assessment. Mitigation measures and recommendations as proposed by the Specialists have been included and addressed in the Draft EIR (and in particular the Draft Environmental Management Programme, EMP).</p>
Acceptance / Approval of Final Scoping Report			
4	<p>Date: 11th December 2020 Format: Email Letter I&AP: DENC (Mr. Olebile Seshupo (Case Officer))</p>	<p>The final scoping report for the Environmental Impact Assessment which was submitted by you in respect to the above-mentioned application and received by the Department in 16th October 2020 has been accepted by the Department. You may accordingly proceed with the undertaking of the environmental impact assessment in accordance with tasks that are outlined in the plan of study for environmental impact assessment. Also as part of the specialist studies identified please include traffic impact assessment as the proposed development is situated adjacent to the N10.</p>	<p>Respondent: EAP It is noted that the Final Scoping Report has been accepted / approved. The next phase is to submit the Draft EIR (this report) and notify the registered I&APs of the availability of this report for comment.</p> <p>A letter was submitted to the SANRAL (Appendix 3E.2.1). In response, SANRAL stipulated;</p> <ul style="list-style-type: none"> • It is an extension of the existing township; • No direct access from the N10 is requested. <p>Overall, SANRAL stated that they have no objection. Moreover, a Traffic Impact Assessment (TIA) was not requested / required by SANRAL.</p>
5		<p>I would like to also highlight two things, one being that a traffic impact assessment be conducted for all the proposed townships that are adjacent to the N10, also liaise with the Traffic Department for any comments or recommendations. Secondly, please include biodiversity impact assessment on all the proposed townships so that both fauna and flora are assessed. The reason for this is because I have noticed that in some instances you have only mentioned botanical impact assessment which will only focus on vegetation/plants.</p>	<p>Respondent: EAP Noted. Please note that the proposed development is located adjacent to the N10. Please see comment above (Comment No. 4). Letter submitted to the SANRAL has been attached as Appendix 3E.2.1 and response from the SANRAL as Appendix 3E.2.2. A letter was submitted to the SANRAL (Appendix 3E.2.1). In response, SANRAL stipulated;</p> <ul style="list-style-type: none"> • It is an extension of the existing township; • No direct access from the N10 is requested. <p>Overall, SANRAL stated that they have no objection. Moreover, a Traffic Impact Assessment (TIA) was not requested / required by SANRAL.</p>

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			Please note that the fauna (and avi-fauna) information has been included as part of the Botanical Assessment (Appendix 6A) – detailing the overall biodiversity of the proposed site for development.