



PROPOSED NEW TOWNSHIP DEVELOPMENT ON ERF 1, ERF 45, AND ERF 47, WEGDRAAI, !KHEIS LOCAL MUNICIPALITY, NORTHERN CAPE

APPLICANT: !Kheis Local Municipality

COMMENT AND RESPONSE REPORT


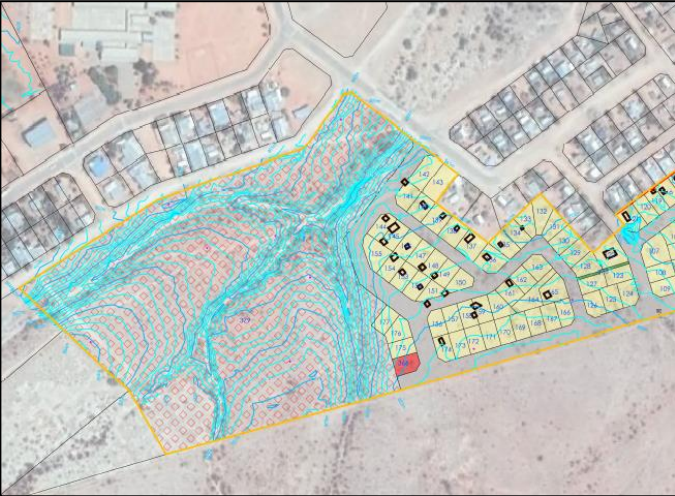
(DENC Ref. No: NC/EIA/10/ZFM/!KHE/WED1/2020)

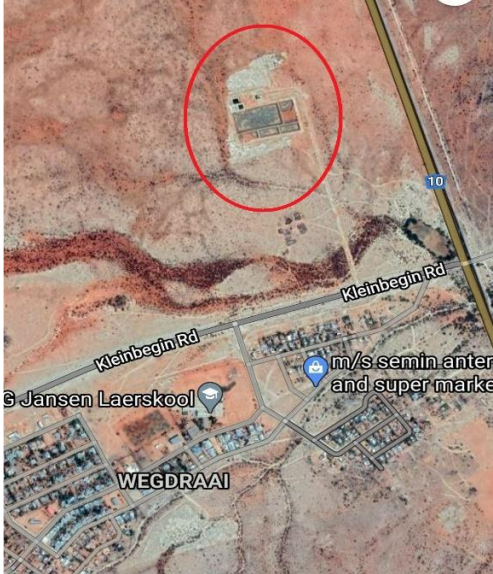
No.	Comment Date, Comment Format, Organisation/I&AP	Comment	Response from EAP/Applicant/Specialist/Project Manager <i>Please note: All registered I&APs will be given the opportunity to comment on the draft EIR.</i>
Comments Received on Initial Public Participation			
1	<p>Date: 17/06/2020 Format: Email Letter I&AP: Gariep Watch (Chairman: Mr Ferdie Botha/ Technical Advisor: Mr Fritz Bekker)</p>	<p>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.</p> <p>We noted your abovementioned NEMA Public Participation Process (Ref. 0512) for a new township development at Topline, with much concern.</p> <p>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.</p>	<p>Respondent: EAP Noted. Thanks for your comment.</p> <p>Respondent: EAP 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). The calculated sewer flow rate is 453 500l/day with a peak flow of 24.3l/s. Existing oxidation ponds are non-functional where sections of the HDPE lining has been removed / ripped which must be replaced / repaired. Construction and upgrades to existing sewerage management infrastructure, as recommended by the Engineer includes;</p> <ul style="list-style-type: none"> • Construction of a new sewer pump stations capable of delivering 40 l/s direct to the Wastewater Treatment plant; • New 940m long, 250mm diameter Class 6 PVC pipelines between the pump station and a new Wastewater Treatment Plant (oxidation ponds).

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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> <div data-bbox="524 373 1263 740" data-label="Image"> </div> <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. 	<ul style="list-style-type: none"> • Upgrading of the existing Wastewater Treatment Plant (oxidation ponds) with a capacity of 0.5MI per day. <ol style="list-style-type: none"> 1. Requested information has been sent to the I&AP. 2. Noted. The calculated sewer flow rate is 453 500l/day with a peak flow of 24.3l/s. Existing oxidation ponds are non-functional where sections of the HDPE lining has been removed / ripped which must be replaced / repaired. Should a full borne WWTW be required, the WWTW will include the construction of: <ul style="list-style-type: none"> • Construction of a new sewer pump stations capable of delivering 40 l/s direct to the Wastewater Treatment plant;

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		Please also register Gariep Watch as an I&AP for these new township developments.	<ul style="list-style-type: none"> New 940m long, 250mm diameter Class 6 PVC pipelines between the pump station and a new Wastewater Treatment Plant (oxidation ponds). Upgrading of the existing Wastewater Treatment Plant (oxidation ponds) with a capacity of 0.5MI per day. <p>Noted, Gariep Watch has been registered as an I&AP.</p>
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"> 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. That this Council adhere to the call of its poor residents to avail land for housing purpose. The Technical reports will address the needs and will serve as business plans to obtain financial support from Government institutions. 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.

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3	<p>Date: 1st October 2020 Format: Email Letter I&AP: Gariiep Watch (Chairman: Mr Ferdie Botha/ Technical Advisor: Mr Fritz Bekker)</p>	<p>The July 2020 EnviroAfrica draft Scoping Report and Plan of Study for the above-mentioned development of 360 erven on 45 ha at Wegdraai has reference.</p> <p>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 IKheis local municipality.</p> <p>We agree that housing is necessary to promote socioeconomic development and to provide the basic needs of the Wegdraai 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 the local government unable to provide services for all people.</p> <p>Our comments pertaining to this application for Wegdraai are as follows:</p> <p>1. The proposed extension of the Wegdraai settlement will interfere with a juncture of well-defined drainage lines as shown in Plate 1. This ephemeral stream has a large catchment within the proposed development area and flows 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 is proposed within a Critical Biodiversity Area and incorporates this ephemeral stream with its many tributaries. This ephemeral stream can be avoided completely by tailoring the proposed layout to exclude drainage lines, corridors or riparian zones.</p>	<p>Respondent: EAP</p> <p>Noted. Thank you for your comment.</p> <p>Noted. Please refer to the Engineer's Services Report (Appendix 4B) stipulating recommendations made by the Engineer regarding 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 Undetermined Zoning Land Use (please refer to Figure 2 below). Therefore, this mitigates impacts associated with the proposed housing development in close proximity to the identified watercourses. As per Figure 2 below, no houses will be constructed within the identified watercourses.</p>

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		 <p data-bbox="517 927 1285 979">Figure 1: Ephemeral stream with its many tributaries in the proposed development area.</p>	 <p data-bbox="1308 815 2076 927">Figure 2. Proposed land use zoning associated with the previously identified watercourses as per Figure 1. Please refer to the Freshwater Assessment (Appendix 6C), preferred design layout (Appendix 2D), and the Draft EMPr (for proposed mitigation measures).</p>
		<p data-bbox="517 1123 1285 1262">2. The existing oxidation pond system situated to the north of Wegdraai is in disrepair as shown in Plate 2. 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 EIA.</p>	<p data-bbox="1308 1011 2076 1150">2. Noted. Existing and proposed sewage management has been identified / detailed in the Engineer's Services Report (Appendix 4B). As per recommendations proposed by the Engineer, recommendations for sewage management infrastructure capable of servicing the proposed development includes;</p> <ul data-bbox="1357 1155 2051 1350" style="list-style-type: none"> • Construction of a new sewer pump stations capable of delivering 40 l/s direct to the Wastewater Treatment plant; • New 940m long, 250mm diameter Class 6 PVC pipelines between the pump station and a new Wastewater Treatment Plant (oxidation ponds). • Upgrading of the existing Wastewater Treatment Plant (oxidation ponds) with a capacity of 0.5MI per day.

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		 <p data-bbox="517 900 1099 922">Figure 2. Wegdraai oxidation pond system in disrepair.</p>	
		<p data-bbox="517 1038 1285 1145">3. It is recommended that specialist botanical studies should be performed as part of the EIA to delineate the watercourses and its associated vegetation. A ground water investigation should also be performed as part of the freshwater impact assessment.</p>	<p data-bbox="1310 932 2078 1230">3. Noted. A Botanical (Appendix 6A), Freshwater (Appendix 6C), Heritage Assessment (Appendix 6B), and Geotechnical Investigation (Appendix 6D) have been appended to the Draft EIR. As per the Geotechnical Investigation, no perched groundwater was encountered on site during the geotechnical investigation (and is not anticipated to be problematic on site). Seepage water may be encountered in the vicinity of the wastewater disposal areas. Groundwater is expected to occur at depths less than 15m within compact, argillaceous strata. Successful drilling for water within the proposed site for development is expected to be between 40 – 60% whereas the drilling for a borehole yielding at least 2l/s ranges between 10 – 20%.</p>
		<p data-bbox="517 1267 1285 1342">4. River health indices will not be feasible on the ephemeral drainage lines but could be conducted in the Orange River up-stream and downstream from the proposed development.</p>	<p data-bbox="1310 1267 2078 1369">4. Noted. 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</p>

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		Aspects pertaining to solid waste, stormwater, groundwater and wastewater management should be key components of the Environmental Impact Assessment. All necessary measures must be put in place to prevent any pollution from reaching the Orange River.	Freshwater Assessment, biomonitoring was conducted at eleven (11) sampling points along the Lower Orange River, namely Augrabies Lair 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.
Acceptance / Approval of Final Scoping Report			
4		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 16 th 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 on the plan of study for environmental impact assessment.	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.
5	Date: 11 th December 2020 Format: Email Letter I&AP: DENC (Mr. Olebile Seshupo (Case Officer))	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.	Respondent: EAP Noted. Please note that the proposed development is not located adjacent to the N8 or N10. Letter submitted to the Department of Road and Public Works (DRPW) has been attached as Appendix 3E.2.1 and response from DRPW as Appendix 3E.2.2. A letter was submitted to the Department of Roads & Public Works (DRPW) (Appendix 3E.2.1). The objectives of the letter were to: <ol style="list-style-type: none"> 1. To notify DRPW of the proposed township establishment project; 2. To obtain a no-objection for the land use changes (subdivision and rezoning), in terms of the Spatial Planning Land 3. Use Management Act (Act 16 of 2013), that need to be followed for the planned township establishment; 4. To obtain approval in terms of the Advertising on Roads and Ribbon Development Act, 21 of 1940; and 5. To obtain approval for the proposed access points.

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			<p>In response (26th October 2020), the DRPW stated that they do not object to the proposed development however, a Traffic Impact Assessment (compliant with TMH16) and detailed designs of the accesses (compliant with TRH 17) must be added as a condition to the granting of the EA and be submitted for review by the DRPW.</p> <p>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.</p>