




PROPOSED TOWNSHIP DEVELOPMENT ON PLOT 2627 AND ERF 131, GROOTDRINK, !KHEIS LOCAL MUNICIPALITY

APPLICANT: !Kheis Local Municipality

COMMENT AND RESPONSE REPORT

(DENC Ref. No: NC/EIA/14/ZFM/!KHE/GRO2/2020)

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: Gariep Watch (Chairman: Mr Ferdie Botha/ Technical Advisor: Mr Fritz Bekker)	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. We noted your abovementioned NEMA Public Participation Process (Ref. 0512) for a new township development at Topline, with much concern.	Respondent: EAP Noted. Thanks for your comment.
		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.	Respondent: EAP Noted. Current water supply, sewage and solid waste management 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.

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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>1. Requested information has been sent to the I&AP.</p> <p>Noted. Please refer to the Engineer's Services Report (Appendix 4B) regarding recommended construction / upgrade to existing sewage infrastructure. Houses in the Grootdrink village is currently serviced by conservancy tanks or VIP toilets. There are presently no waterborne sewer systems. The conservancy tanks are currently emptied by a honey sucker truck and spilt in an oxidation pond system to the west of the village. Recommended sewage infrastructure as per the Engineer's Services Report (Appendix 4B) for the proposed development includes;</p>

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		Please also register Gariep Watch as an I&AP for these new township developments.	<ul style="list-style-type: none"> • Construction of two new sewer pump stations capable of delivering 50 l/s direct to the Wastewater Treatment Plant. • New 250mm diameter and 160mm diameter Class 6 PVC pipelines (1600m & 1800m) between the pump stations and a upgraded Waste Water Treatment Plant (oxidation ponds). • Upgrading of the Wastewater Treatment Plant (oxidation ponds) to a capacity of 0.7MI per day. <p>Noted, Gariep Watch has been registered as an I&AP.</p>
Respondent: !Kheis Local Municipality Response on Initial PP (Appendix 1E.4)			
<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>			
<p>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.</p>			
<p>2. That this Council adhere to the call of its poor residents to avail land for housing purpose.</p>			
<p>3. The Technical reports will address the needs and will serve as business plans to obtain financial support from Government institutions.</p>			
<p>4. To obey to the course of restoring dignity to poor people and correct the imbalances of the past.</p>			
Comment 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.	Respondent: EAP Noted, thank you. The draft EIR will be made available to SAHRA for comment.

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		Should you have any further queries, please contact the designated official using the case number quoted above in the case header.	
3	<p>Date: 1st October 2020 Format: Email Letter I&AP: Gariep 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 at Grootdrink has reference.</p> <p>Thank you for registering Gariep Watch as an Interested and Affected Party and incorporating our correspondence of 17 June 2020 into 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 Groblershoop community.</p> <p>Our comments pertaining to this application for Grootdrink are as follows:</p> <ol style="list-style-type: none"> 1. The proposed extension of the Grootdrink 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 to the north of Grootdrink on Erf 2627 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 system of oxidation dams just west of Grootdrink was recently investigated by Gariep Watch. The infrastructure is in disrepair with fences removed, buildings vandalized, and oxidation dam linings stolen. These oxidation dams have been fitted with an impermeable lining for a reason, which is to prevent sub-surface seepage of sewerage water from polluting groundwater resources and the Orange River. <p>The development of 370 new erven on 36 hectares at Grootdrink will increase the potential for surface and groundwater pollution if appropriate</p>	<p>Respondent: EAP</p> <p>Noted.</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. A Freshwater Impact Assessment (Appendix 6C) has been conducted to investigate the presence and condition of watercourses within the development footprint. Four layout designs were investigated relative to environmental, physical and socioeconomic factors. The preferred design layout (Appendix 2D) has zoned the drainage line as Open Space II and Undetermined Land Uses –avoiding the development of housing within close proximity to these watercourses, and the impacts associated with such development on watercourses.</p> <p>2. Noted. As per the Freshwater Impact Assessment (Appendix 6C), the existing sewage management infrastructure is non-functional. As per the Engineer's Services Report, proposed recommendations include;</p> <ul style="list-style-type: none"> • Construction of two new sewer pump stations capable of delivering 50 l/s direct to the Wastewater Treatment Plant. • New 250mm diameter and 160mm diameter Class 6 PVC pipelines (1600m & 1800m) between the pump stations and a

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		<p>wastewater infrastructure is not professionally designed, constructed and maintained.</p> <p>Aspects pertaining to solid waste, stormwater, groundwater, and wastewater management should be key components of the Environmental Impact Assessment.</p>	<p>upgraded Waste Water Treatment Plant (oxidation ponds).</p> <ul style="list-style-type: none"> Upgrading of the Wastewater Treatment Plant (oxidation ponds) to a capacity of 0.7MI per day. <p>Therefore, these recommendations will provide adequate services to the proposed housing development.</p> <p>Noted. Existing and Future Services (water supply, sewage management, solid waste management, roads, electricity supply, and stormwater management) recommended for the proposed development have been included in the Engineer's Services Report (Appendix 4B) and Draft EIR.</p>
Comment Received on Draft Scoping Report			
4		<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.</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>
5	<p>Date: 11th December 2020 Format: Email Letter I&AP: DENC (Mr. Olebile Seshupo (Case Officer))</p>	<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 existing Topline Settlement is located adjacent to the N10 whereas the proposed Topline Housing Development is located at least 135m away from the N10. Letter submitted to the SANRAL has been attached as Appendix 3E.2.1 and response from SANRAL as Appendix 3E.2.2. SANRAL's response to the aforementioned letter included, but was not limited to, approving the submitted site development plan, a permanent 2m fence must be erected on the boundary of the land development area and the national road reserve, no new access to the national road will be allowed. The undertaking of 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.