




**PROPOSED NEW TOWNSHIP DEVELOPMENT ON PORTION 16 OF FARM 48,
GROBLERSHOOP, !KHEIS LOCAL MUNICIPALITY, NORTHERN CAPE**

APPLICANT: !Kheis Local Municipality

COMMENT AND RESPONSE REPORT

(DENC Ref. No: NC/EIA/13/ZFM/!KHE/GRO1/2020)

No.	Comment Date, Comment Format, Organisation/I&AP	Comment	Response from EAP/Applicant/Specialist/Project Manager
Comments Received on Initial Public Participation Process			
1	Date: 17/06/2020 Format: Email Letter I&AP: Gariiep Watch (Chairman: Mr Ferdie Botha/ Technical Advisor: Mr Fritz Bekker)	<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>Respondent: EAP Noted. Thanks for your comment.</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 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.</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. Please refer to the Engineer's Services Report (Appendix 4B) regarding recommended construction / upgrade to existing sewage infrastructure. Recommended sewage infrastructure as per the Engineer's Services Report (Appendix 4B) for the proposed development includes; <ul style="list-style-type: none"> • A new Sewer Pump Station for Sternheim and Witblok extensions are in construction implementation phase (data and flows not available);

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		Please also register Gariep Watch as an I&AP for these new township developments.	<ul style="list-style-type: none"> • In addition the proposed new 1500 stands development shall require a new bulk sewer infrastructure as follow: <ul style="list-style-type: none"> ○ Construction of two new sewer pump stations (2 x40 l/s); ○ Construction of new 200mm rising mains (1.3km and 2.1km); ○ Upgrading of existing 670 kL/day WWTW facility to upgraded 1.6 ML WWTW facility. <p>Noted, Gariep Watch has been registered as an I&AP.</p>
<p>Respondent: !Kheis Local Municipality Response on Initial PP (Appendix 3E.6)</p> <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> <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. 3. To obey to the course of restoring dignity to poor people and correct the imbalances of the past. 4. 			

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Comments Received on Draft Scoping Report			
2	<p>Date: 9th August 2020 Format: Email Letter I&AP:</p>	<ol style="list-style-type: none"> 1. Graag verwys ek u na die skrywe ontvang van EnviroAfrica gedateer 15 Mei 2020. 2. Hierdie dokument bevestig !Kheis munisipaliteit se voorneme om 'n woonbuurt to ontwikkel direk langs die abattoir. 3. Graag verwys ek u na die meegaande lugfoto aangeheg. 4. Die impak op die abattoir gaan aansienlik wees veral op die volgende areas; <ul style="list-style-type: none"> - Infrastruktuur - Veiligheid 5. As maatskappy is dit egter noodsaaklik da tons moet focus op samewerking en die uitbou van ons gemeenskap en dorp se behoeftes. 6. Daarom steun ons die ontwikkeling maar wil graag die volgende versoek tot u rig. 7. Neem ook kennis da tons as grootste enkel werkgewer in die bedieningsarea van !Kheis Munisipaliteit gebuk gaan onder geweldige finansiële druk. 8. Tans moet ons koste sny waar ons kan om die aflegging van personeel te voorkom. 9. Voorts moet ons meeding teenoor die De Aar Abattoir tak van die maatskappy tov operasionele kostes. Indien ons kostes op Groblershoop buitensporing gaan raak, sal ons die abattoir op Groblershoop moet sluit en voortgaan op die De Aar Abattoir weens die finansiële implikasie van toenemende iutgawes. 10. Tans geen die abattoir aan 188 werknemers permanente werk en skep vir n werdere 15 per week tydelike werk. 11. Uit hierdie oogpunt versoek ons asb u hulp en ondersteuning t.o.v. die volgende versoek. 12. Met die ontwikkeling van die nuwe woonbuurt gaan ons bestaande pensmisdamme in die ontwikkelingsone val. 13. Dit sluit die drie damme en ook toevoerlyn in (Aangedui in groen). 14. Hierdie area is toegestaan aan die abattoir in Junie 1993 deur Groblershoop Munisipaliteit as deel van die ontwikkeling van die abattoir. 15. Ons versoek is dat ons die damme kan skuif na direk after die abattoir soos aangedui met die blou driehoek. 16. Die oppervlakte benodig is sowat 3 hektaar. 	<p>Respondent: !Kheis Local Municipality</p> <p>REQUEST TI INVESTIGATE THE ABATTOIR ON PROPOSED LAND DEVELOPMENT FOR HOUSING IN GROBLERSHOOP.</p> <p>The above-mentioned and the instruction from Barzani to conduct a safety investigation on the local abattoir bears reference.</p> <ol style="list-style-type: none"> 1. The issue of the dumping water dams was previously discussed with the management of the abattoir. 2. Due to a previous agreement to replace these dams, it was now agreed that it will form part of the new town outlay. 3. Surely it will not hamper the proposed new township establishment as the dams will shift to a safer place within the Spatial Development Framework. 4. Attached is the communication from the abattoir to emphasize the willingness and desire to assist with the best suitable solution.

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		<p>17. Tog sien ons ook die voordeel in die skuif tot voordeel van !Kheis Munisipaliteit en ook die kleinvee boere in die aandrensende area agter die voorgestel ontwikkelingsarea.</p> <p>18. Ons is van oordeel dat ons in samewerking met u en ander rolspelers die area kan ontwikkel en omskakel na aangeplante weiding vir diere.</p> <p>19. In kort kan gekyk word na bespreoing uit die damme vir aangeplante weiding tot voordeel van die kleinvee boere.</p> <p>20. Graag versoek ons dus !Kheis Munisipaliteit om die grond aan ons op 'n langtermyn gebruik ooreenkoms beskikbaar te stel vir die ontwikkeling.</p> <p>21. Dankie vir die geleentheid om hierdie aansoek aan u voor te hou.</p> <p>22. U terugvoer sal hoog op prys gestel word.</p> <p><i>(Please see Appendix 1E.3.2 for comment translated to English. Please note that the English translation was not approved by the registered I&AP who submitted this initial comment).</i></p>	
3	<p>Date: 28th August 2020 Format: Email Letter I&AP: SAHRA</p>	<p>Interim Comment</p> <p>SAHRA requires the draft EIA documents before further comments can be issued.</p> <p>Should you have any further queries, please contact the designated official using the case number quoted above in the case header.</p>	<p>Respondent: EAP</p> <p>Noted, thank you. The draft EIR will be made available to SAHRA for comment.</p>
4	<p>Date: 22nd September 2020 Format: Email Letter I&AP: Gariiep Watch (Mr Fritz Bekker)</p>	<p>The July 2020 EnviroAfrica draft Scoping Report and Plan of Study for the above-mentioned development at Groblershoop 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 !Kheis local municipality.</p> <p>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</p>	<p>Respondent: EAP</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>

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		<p>opportunities can also lead to greater poverty with local governments unable to provide services for all people.</p> <p>Gariep Watch takes note of the assertion in paragraph 6.2 of the draft Scoping Report that sewer availability and the capacity thereof will be investigated to determine whether new sewerage infrastructure is required. We also agree with the conclusion that an EIA will be required, including specialist biodiversity and freshwater assessments.</p> <p>Our further comments pertaining to this application are as follows:</p> <ol style="list-style-type: none"> 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. 	<p>Noted. Please refer to the Engineer's Services Report (Appendix 4B). The Engineer's Services Report details existing (relative to water supply, sewage infrastructure, solid waste management, roads, electricity, and stormwater management) and recommended infrastructure to service the proposed development. Please note that the Botanical Impact Assessment (Appendix 6A), Heritage Impact Assessment (Appendix 6B), Freshwater Impact Assessment (Appendix 6C), and Geotechnical Investigation (Appendix 6D) have been apexed to the Draft EIR.</p> <p>Noted. A Freshwater Impact Assessment (Appendix 6C) has been conducted to investigate the presence and condition of watercourses within the development footprint. As per the Freshwater Impact Assessment, the Freshwater Specialist classified the drainage line, present within the site footprint, as having a small economic footprint. The preferred design layout (Appendix 2D) has zoned the drainage line, present in the northern section of the proposed site for development, as Open Space II / III.</p> <p>Please note that as per Figure 1, the mentioned drainage line (depicted as inset A on Figure 1), falls outside the proposed site for development and is likely to be associated with the defunct sewage management infrastructure. A sewage spillage, within the proposed development footprint, has resulted in the establishment of vegetation around the spillage. Please refer to Figure 6 and Figure 7 of the Draft EIR as well as the Botanical Impact Assessment (Appendix 6A).</p>

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		 <p data-bbox="517 871 1218 898">Figure 1. Drainage line and culvert in proposed development area</p>	
		<p data-bbox="517 1027 1285 1107">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.</p>	<p data-bbox="1308 932 2080 1201">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 line – zoning this area as Open Space II / III. Therefore, this mitigates impacts associated with the proposed housing development in close proximity to the identified watercourses. The proposed layout also takes topography into consideration relative to the zoning.</p>
		<p data-bbox="517 1222 1285 1331">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.</p>	<p data-bbox="1308 1211 2080 1342">Noted. A sewage spillage, within the proposed development footprint, has resulted in the establishment of vegetation around the spillage. Please refer to Figure 6 and Figure 7 of the Draft EIR as well as the Botanical Impact Assessment (Appendix 6A). Please refer to the Engineer's Services Report (Appendix 4B) which has detailed capacities</p>

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		<p>The development of 1500 new erven on 95 hectares will aggravate this situation if new infrastructure is not professionally designed, constructed and maintained.</p>	<p>of existing services as well as recommended infrastructure required to service the proposed development.</p>
		<p>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.</p> <p>These boreholes are being used for irrigation, livestock watering and potable purposes and may pose a risk to public health.</p>	<p>Noted. The Engineering Services Report, prepared by Bvi Consulting Engineers, has addressed the current state of the sewage management infrastructure as well as recommendations for the construction / upgrade of sewage infrastructure to adequately service the proposed development.</p>
		<p>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.</p>	<p>Noted. Illegal dumping was noted during the site visit as well as by specialists during their site assessments (Appendix 6A-D). A waste management plan should be compiled and implemented for the construction and operational phases of the proposed development.</p>
		<p>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.</p>	<p>Noted. A Botanical Impact Assessment, including a faunal component, has been compiled and annexed to the Draft EIR as Appendix 6A. As per the Botanical Impact Assessment, the specialist stated that with the implementation of the proposed the mitigation measures, it is unlikely that the development will contribute significantly to any of the following:</p> <ul style="list-style-type: none"> • Significant loss of vegetation type and associated habitat; • Loss of ecological processes (e.g. migration patterns, pollinators, river function etc.) due to construction and operational activities; • Loss of local biodiversity and threatened plant species; and • Loss of ecosystem connectivity. <p>Please refer to Appendix 6A for a detailed information on the above.</p>
		<p>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.</p>	<p>Noted. The watercourse present within the proposed development footprint is a non-perennial watercourse which is 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 trust, Groblershoop, Kakamas Triple D, Hopetown Sewer, Hopetown</p>

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		All necessary measures must be put in place to prevent any pollution from reaching the Orange River.	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 propose 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			
5	<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 un 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>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 (Appendix 3E.2.1) was submitted to SANRAL on the 13th October 2020. The objectives of this letter were to:</p> <ol style="list-style-type: none"> 1. Notify SANRAL 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 and Land Use Management Act (Act 16 of 2013), that needs to be followed for the planned township establishment; 3. To obtain approval in terms of the South African National Roads Agency Limited and National Roads Act, 1998 (Act 7 of 1998); 4. To obtain approval from SANRAL with regards to the proposed access point. <p>As per Appendix 3E.2.2, SANRAL responded as follows; “The South African National Roads Agency SOC Limited (SANRAL), in principle has no objection to the Proposed Rezoning and Subdivision of Portion 16 of the Farm Boegoeberg no 48, however access approval can only be determined by the undertaking of a TIA to define the impact that this new proposed access would have on the N10. The location of the access and the type of access that would be required must be evaluated in the TIA”. Therefore, the undertaking of a TIA should be made a condition on granting the Environmental Authorisation.</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	Please see comment above.

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		<p>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>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>