

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



FINAL ENVIRONMENTAL IMPACT ASSESSMENT REPORT

D:E&NC reference number: NC/EIA/13/ZFM/!KHE/GRO1/2020

APRIL 2021

!KHEIS LOCAL MUNICIPALITY

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

D:E&NC Ref No.: NC/EIA/13/ZFM/!KHE/GRO1/2020

**PREPARED FOR:
!Kheis Local Municipality**

Private Bag X2,
Groblersshoop,
8850
Tel: 054 833 9500

**PREPARED BY:
EnviroAfrica**

P.O. Box 5367
Helderberg
7135
Tel: 021 – 851 1616
Fax: 086 – 512 0154

EXECUTIVE SUMMARY

Introduction

Consideration is being given to the development of a new township, consisting of approximately 1500 erven, including associated infrastructure, on Portion 16 of Farm 48, Groblershoop. The total area to be developed measures 95 (ninety-five) hectares. The proposed development will be comprised of approximately:

- **1500 x Residential Zone I units:** dwelling house/ residential house containing one residential unit - a self-contained interlinking group of rooms for the accommodation and housing of a single family, or a maximum of four persons;
- **11 x Business Zone I units:** business building / premises which will be used as shops and/or offices (e.g. professional offices, places of assembly, doctors consulting rooms);
- **4 x Institutional Zone II units:** place of worship (e.g. places for practising religion);
- **14 x Open Space II units:** public open space to be utilized by the public as an open space, park, garden, playground, or recreational site;
- **1 x Transport Zone I units:** public street reserved for street purposes and includes facilities for public transport;
- **1 x Authority Zone I units:** land/ erven and buildings utilized by local and district municipality to carry out mandatory functions.

The proposed site for development is located within Ward 3 of the !Kheis Local Municipality, ZF Mgcawu District Municipality. The site is located to the south-east of Groblershoop, to the west of the N10, in the !Kheis Local Municipality, Northern Cape, at the following co-ordinates: 28°54'33.90" S; 21°59' 44.90"E.

The applicant is !Kheis Local Municipality who will undertake the activity should it be approved. EnviroAfrica CC has been appointed as the independent environmental assessment practitioner (EAP) responsible for undertaking the relevant EIA and the Public Participation Process required in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA).

The Application Form and Draft Scoping Report was submitted to the DENC on the **29th July 2020**. The Final Scoping Report and Plan of Study for this EIA was submitted to the Department of Environment and Nature Conservation (DENC) on the **8th October 2020**. The Scoping Report and Plan of Study for EIA were approved by DENC on the **11th December 2021** and EnviroAfrica were advised to proceed with the EIA process (**Appendix 1B**).

Environmental Requirements

The National Environmental Management Act (Act 107 of 1998) (NEMA), as amended, makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the relevant authorities based on the findings of an environmental assessment. NEMA is a national act, which is enforced by the Department of Environmental Affairs (DEA). These powers are delegated in the Northern Cape to the Department of Environment and Nature Conservation (DE&NC).

On the 04 December 2014 the Minister of Water and Environmental Affairs promulgated regulations in terms of Chapter 5 of the NEMA, namely the EIA Regulations 2014. These were amended on 07 April 2017 (GN No. 326, No. 327 (Listing Notice 1), No. 325 (Listing Notice 2), No. 324 (Listing Notice 3) in Government Gazette

No. 40772 of 07 April 2017). Listing Notice 1 and 3 are for a Basic Assessment and Listing Notice 2 for a full Environmental Impact Assessment.

According to the regulations of Section 24(5) of NEMA, authorisation is required for the following listed activities for the proposed agricultural development:

Government Notice R327 (Listing Notice 1) listed activities:

- 9 The development of infrastructure exceeding 1000 metres in length for the bulk transportation of water or storm water;
 - (i) with an internal diameter of 0,36 metres or more; or
 - (ii) with a peak throughput of 120 litres per second or more;
 excluding where;
 - a) such infrastructure is for bulk transportation of water or storm water or storm water drainage inside a road reserve or railway line reserve; or
 - b) where such development will occur within an urban area.

- 10 The development and related operation of infrastructure exceeding 1000 metres in length for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes
 - (i) with an internal diameter of 0,36 metres or more; or
 - (ii) with a peak throughput of 120 litres per second or more;
 excluding where;
 - (a) such infrastructure is for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes inside a road reserve or railway line reserve; or
 - (b) where such development will occur within an urban area.

- 12 The development of;
 - (i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres;
 - (ii) infrastructure or structures with a physical footprint of 100 square metres or more;
 where such development occurs;
 - (a) within a watercourse;
 - (b) in front of a development setback; or
 - (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;

- 19 The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;
 - (a) will occur behind a development setback;
 - (b) is for maintenance purposes undertaken in accordance with a maintenance management plan; or
 - (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies.

- 24** The development of a road;
 (i) for which an environmental authorisation was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010; or
 (ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres;
 but excluding a road;
 (a) which is identified and included in activity 27 in Listing Notice 2 of 2014; or
 (b) where the entire road falls within an urban area; or
 (c) which is 1 kilometre or shorter
- 27** The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for;
 (i) the undertaking of a linear activity; or
 (ii) maintenance purposes undertaken in accordance with a maintenance management plan.
- 56** The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre;
 (i) where the existing reserve is wider than 13,5 meters; or
 (ii) where no reserve exists, where the existing road is wider than 8 metres;
 excluding where widening or lengthening occur inside urban areas.

Government Notice R325 (Listing notice 2) listed activities:

- 15** *The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for;*
(i) the undertaking of a linear activity; or
(ii) maintenance purposes undertaken in accordance with a maintenance management plan.

Government Notice R324 (Listing notice 3) listed activities:

- 4** *The development of a road wider than 4 metres with a reserve less than 13.5 metres*
- 12** *The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.*
- 14** *The development of;*
(i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 10 square metres;
(ii) infrastructure or structures with a physical footprint of 10 square metres or more;
where such development occurs;
(a) within a watercourse;
(b) in front of a development setback; or
(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;

Excluding the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;

Need and Desirability

Housing is a national need, including in the !Kheis Local Municipality.

The !Kheis Local Municipality aims to promote socioeconomic development through the eradication of backlogs associated with housing, water and sanitation, and electricity, as well as improve basic services within Groblershoop. In order to meet the growing needs of the community within Groblershoop, the Council resolved that a project business plan be submitted to Co-operative Governance, Human Settlements and Traditional Affairs (COGHSTA) for this proposed development. As per the !Kheis Integrated Development Plan (IDP) 2019/2020, a key performance indicator includes the provision of infrastructure and basic service through securing suitable land for human settlement projects, where suitable land for this purpose was previously identified in Groblershoop, Boegoeberg, Topline, Wegdraai, Grootdrink, Gariep, and Opwag. The provision of affordable housing remains a high priority for the Municipality which will restore the dignity of disadvantaged people by providing shelter and access to basic human rights as enshrined in the Constitution of South Africa.

The proposed Groblershoop Housing development is in line with the !Kheis IDPs key strategic and development objectives, namely to improve and maintain basic service delivery through specific infrastructural projects including human settlements and basic services, in the poverty-stricken Groblershoop Township. According to the SDF, the population in Groblershoop increased from 741 (in 2001) to 4938 in 2011 (where 50% of the population are male and 50% female). Therefore, this community requires formalized, state-instituted housing, and associated, infrastructure. The proposed development will distribute the density of the population, improve community member's standard of living, as well as access to essential services including roads, electricity, water supply, appropriate sewage disposal infrastructure, and environmental health in the area. Therefore, the proposed development will enable adequate housing to be constructed, thereby promoting access to basic service delivery as well as socioeconomic development in the Groblershoop Township and its surroundings. !Kheis Local Municipality is committed to the vision of the National Government of which it committed itself towards accelerating shared growth to halve poverty and unemployment and promote social inclusions. Housing is one of the social inclusions in this vision. The proposed development will distribute the density of the population, improve community member's standard of living, as well as access to essential services including water, electricity, roads, appropriate waste management (e.g. sewage disposal infrastructure), and environmental health in the area. Therefore, the proposed development will enable adequate housing to be constructed, thereby promoting access to basic service delivery as well as socioeconomic development in Groblershoop and its surroundings. !Kheis Local Municipality is committed to the vision of the National Government of which it committed itself towards accelerating shared growth to halve poverty and unemployment and promote social inclusions. Housing forms an integral component of this vision.

Site Description

The proposed site is located to the south-east of Groblershoop, to the west of the N10, in the !Kheis Local Municipality, Northern Cape. The proposed site is located adjacent to the N10 and approximately 85km south east of Upington. Although the proposed site is mostly vacant and undeveloped, large portions of the site have been used for illegal dumping of general and hazardous waste. Raw sewage is present within the proposed site for development, which poses a threat to human and environmental health. The sewage spillage may be attributed to a burst / broken pipeline associated with the existing wastewater treatment

works. Other anthropogenic activities contributing to the level of disturbance include (i) general disturbances associated with excavations and illegal dumping of general and hazardous waste (approximately 6ha in extent), p(ii) presence of old oxidation ponds with limited functional capacity (approximately 1.2ha in extent), (iii) presence of additional oxidation ponds (approximately 2.7ha in extent), (iv) small man-made dam, (v) illegal dumping (including construction material), and sewage spillage as mentioned above.

Alternatives

Site Alternatives

The proposed site is the only viable site available which was investigated in this application. The proposed development will be located adjacent to an existing township, namely the Groblershoop Settlement. Housing is a constant need in the municipality, with other sites possibly earmarked for residential development that will not form part of this application. The current and surrounding land use, namely the Groblershoop Settlement, is in line with the nature of the proposed development. The construction of the proposed housing development in another location would increase the construction footprint and therefore, the impact on the environment.

Layout Alternatives

Four (4) design layouts were proposed of which Alternative 4 was the preferred layout. Alternative 4 was preferred due to this layout being in line with recommendations and information received from the Botanical Impact Assessment (Appendix 6A), Heritage Impact Assessment (Appendix 6B), Freshwater Impact Assessment (Appendix 6C), Geotechnical Investigation (Appendix 6D), SPLUMA Application (Appendix 4A), and Engineer's Services Report (Appendix 4B). Alternative 4 is also the preferred layout due to information received from the municipal infrastructure departments in relation to existing services infrastructure, requirements for additional land uses/ changes to proposed land uses (by the local municipality) as well as specific spacing of these land uses. This alternative also provides sufficient erven and housing opportunities (high and lower density), as well as providing for Municipal and Government land use opportunities, more Open Space and sufficient buffer zones recommended by the Botanical and Freshwater specialists. According to the SPLUMA Application (**Appendix 4A**), the erven associated with the preferred layout design (Appendix 2D) are broken down as follows:

- **1500 x Residential Zone I units;**
- **11 x Business Zone I units;**
- **4 x Institutional Zone II units;**
- **14 x Open Space II units;**
- **1 x Transport Zone I unit; and**
- **1 x Authority Zone I units.**

Activity Alternatives

Activity alternatives are also limited with no feasible alternatives besides residential development to assess. Due to the need for housing in the !Kheis Local Municipality, the housing development and associated infrastructure on the property is therefore the only activity considered.

No-Go Alternative

This is the option of not developing the proposed housing development. Although the no-go development might result in no potential negative environmental impacts, the direct and indirect socio-economic benefits (such as housing shortages as well as loss of potential employment and skills-development opportunities) associated with the construction of the residential development will not be realised. The need for additional

housing opportunities in the !Kheis Local Municipality will not be realised – compromising the necessary eradication of backlogs associated with housing, water and sanitation, and electricity, as well as improve basic services within Groblershoop and the surrounding area.

As previously described, the population in Groblershoop is predicted to increase. Moreover, the lack of adequate housing and employment opportunities in other areas surrounding Groblershoop (e.g., Boegoeberg, Grootdrink, Opwag, Topline, and Wegdraai) results in community members leaving their respective area and moving to Groblershoop - increasing pressure on the already financially- and services-constrained town. Due to the failing wastewater treatment works (WWTW), the no-go option will also result in continual pollution and health risks (associated with raw sewage spillages), coupled with huge maintenance costs relative to the functioning (including repairs) of the existing wastewater treatment work.

Tasks to be undertaken during the EIA Phase

The following tasks must still be undertaken during the EIA phase of the process:

- Compile Draft Environmental Impact Report (EIR) for public comment based on specialist information;
- Distribute and/or make the Draft EIR available to registered Interested and Affected Parties for viewing and comment;
- Receive comments on Draft EIR. All comments received and responses to the comments will be incorporated into the Final Environmental Impact Report (EIR); and
- Preparation of a Final EIR for submission to DENC for consideration and decision-making.

Summary and Conclusions of Specialist Studies

The following specialist studies were undertaken as part of this Environmental Impact Assessment:

- Botanical Impact Assessment (Appendix 6A)
- Heritage Impact Assessment (Appendix 6B)
- Freshwater Assessment (Appendix 6C)
- Geo-technical Assessment (Appendix 6D)

Botanical Impact Assessment:

According to the Botanical Impact Assessment (Appendix 6A), due to the size of the development (approximately 95ha), the proposed development will result in the loss of vegetation. The site is located within the Bushmanland Arid Grassland vegetation type, a vegetation type which typically does not support high plant diversity. The site is located within a Critical Biodiversity Area (CBA) however, the proposed development will not impact on any recognized centre of endemism or significantly impact on the surrounding area (i.e. related to connectivity). Fourteen (14) protected [in terms of the National Forests Act (NFA), 1998 (Act 84 of 1998)], Sheppard trees (*Boscia albitrunca*), as well as ten (10) protected plant species, as per the Northern Cape Nature Conservation Act (NCNCA) were observed within the proposed site for development. According to the Botanical Specialist, the proposed development is likely to result in a Medium-Low impact, which can be reduced to a Low impact with the implementation of proposed mitigation measures and effective environmental control during the construction phase. Moreover, with the implementation of proposed mitigation measures, the proposed development is unlikely to significantly contribute to / impact the:

- Loss of vegetation type and associated habitat;
- Loss of ecological processes, including but not limited to migration patterns, pollinators, and river function;
- Loss of local biodiversity and threatened plant species; and
- Loss of ecosystem connectivity.

Faunal diversity changes through space and time and are directly influenced by anthropogenic activities. Such activities include, but are not limited to, animal husbandry (i.e. overgrazing by livestock) and human settlements (e.g. transformation of land) (Chapin *et al.*, 2000¹). The fauna of the Nama Karoo is relatively species-poor (Vernon, 1999). Although smaller mammals, such as genet and mice, are still expected to occur within the proposed site – apart from livestock (namely goats), none of these faunal species were observed (not even traces of their presence – e.g. droppings). It is also considered highly unlikely that game (small and large mammals) occur within the proposed development footprint due to its proximity to the settlement and the scarcity of natural hiding (i.e. vegetation structure pertinent to the site). With regards to avi-fauna, although smaller, common birds were observed during the site visit, no larger birds were observed. Because of the location (next to the existing settlement) the proposed footprint enlargement is not expected to have any significant impact on the surrounding bird populations, especially if larger trees next to the seasonal drainage lines are protected. No reptile or amphibian species were observed during the site survey. The project footprint may provide habitat for various reptile species however, these species are likely to be terrestrial species adapted to the dry Nama-Karoo environmental conditions.

The botanical specialist concluded that, “*with the available information it is recommended that the project be approved, with the proposed mitigation actions*”.

Heritage Impact Assessment

According to the Heritage Impact Assessment (**Appendix 6B**), ten (10) incidences of ESA/ MSA/ LSA lithic material (comprised of informal tools, knapping debris, scrapers, blades, retouched flakes, and cores) were recorded within the development footprint. The majority of the lithics are Banded Ironstone Formation (BIF), an abundant raw material within the area, with some cryptocrystalline silicates (CCS) and quartzite pieces. The material was documented as widely dispersed surface scatters and occurred without any archaeological context. Although these resources will be impacted by the proposed development, these resources are of low significance and thus, the impact will be negligible. No significant heritage sites or features were identified within the proposed site and thus, the cultural material identified is not conservation worthy - no further mitigation is recommended with regards to these resources. Therefore, from a heritage point of view, the Heritage Specialists recommend that the proposed development can continue. A graveyard (graded as IIIB and is of High Local Significance) dating from the 1950s-70s is located within the development footprint. The graveyard was partially covered by building rubble, discarded rubbish, as well as vegetation. The graveyard is in a poor state of preservation. The graveyard is situated within the development footprint but in an area not earmarked for erven division. Mitigation to negate the negative impact of the development is recommended which includes, but not limited to, the demarcation of the graveyards and fencing off the graveyards with a 50m buffer. Due to the low palaeontological significance of the area, no further palaeontological heritage studies, ground-truthing, and/or specialist mitigation are required. It is considered that the development of the proposed development is deemed appropriate and feasible and will not lead to detrimental impacts on the palaeontological resources of the area (Butler 2020). Final comment by SAHRA (Appendix 3E.7) stipulated, “***relevant Interested and Affected Parties /permitting authorities must be consulted prior to the erection of the fence***”.

Freshwater Impact Assessment

According to the Freshwater Assessment (**Appendix 6C**), a drainage line (approximately 700m in length, draining towards and ending against vineyards along the Orange River) within the northern section of the

¹ Chapin Iii, F.S., Zavaleta, E.S., Eviner, V.T., Naylor, R.L., Vitousek, P.M., Reynolds, H.L., Hooper, D.U., Lavelle, S., Sala, O.E., Hobbie, S.E. & Mack, M.C., 2000. Consequences of changing biodiversity. *Nature*, 405(6783), pp.234-242.

proposed site was identified. The drainage line is fed by runoff from the N10 and has a prominent tree line (i.e. riparian vegetation). The illegal dumping of solid waste and building rubble is a threat to the aquatic environment. This drainage line was classified as having a small economic footprint where the loss of this drainage line will not result in the significant loss of ecosystem services.

Urban wastewater is of importance because untreated waste ends up in water ways, raw sewage is dumped in drainage lines. Likewise, several sewage pump stations are dysfunctional, overflowing, with large quantities of raw sewage flowing down drainage lines. Household solid waste is not collected and removed according to standard municipal operating procedures. Large quantities of waste accumulate in the townships and the streets. Large quantities of waste end up in the drainage lines as well. Both the instream and riparian Present Ecological State (PES) of the drainage line were rated as C (Moderately modified. A loss and change of the natural habitat and biota, but the ecosystem function is predominantly unchanged), whereas as no fish species were present due to the non-perennial nature of the drainage lines, the drainage lines were not classified as ecologically important (EI). The drainage lines within the proposed site for development is Ecologically Sensitive.

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 Sewer, Keimoes Housing, Upington Erf 323, Upington Affinity, Styrkraal, Grootdrink Bridge, and Turksvy Dam. These sites were sampled based on elucidating the combined impact of the proposed developments on the Orange River, and was carried out according to Dickens and Graham, (2002). The PES of the Orange River (for both riparian and instream zones) were categorized as Class C (Moderately modified - a loss and change of the natural habitat and biota, but the ecosystem function is predominantly unchanged), and is an Ecologically Important system (as classified by the Freshwater Specialist). Furthermore, the Orange River is Ecologically Sensitive.

The prominent tree line, associated with the identified drainage line, may be attributed to the presence of raw sewage and its flow. The locality on which the dumping takes place and the flow path is clearly visible where the potential dumping may have been taking place over years. The establishment of trees along this sewage spillage is artificially formed and therefore does not have any conservational status with regards to the aquatic features of the site. The wastewater treatment works is not currently functioning at its full capacity, compromising the treatment of sewage generated by the existing Township.

Geotechnical Investigation

According to the Geo-technical Assessment, the proposed site for development was regarded as being of intermediate suitability for the proposed residential development where founding conditions were designated as R, S, S1, and S2. The following are the main conclusions that have been made:

- Geology:

The site for the proposed development is located between the lithology of the Kaapvaal Craton and Namaqua-Natal mobile belt where the remaining, original geology is comprised of Kaaien Terrane whereas the site is located on the Groblershoop Formation of the Brulpan Group. The bedrock associated with the site comprises of lineal bands of micaceous quartzite associated with quartz-amphibole schist of the Groblershoop Formation, Brulpan Group.

- Hydrology:

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%.

In terms of general measures, the following recommendations were made:

- **Founding:** The development must take place according to the SANS 10400H and NHBRC Home Owner's Manual Guidelines (published in 2015).
- **Trench backfill:** only aeolian sand can be regarded as suitable for selected fill or pipe bedding whereas all material (except for hardpan calcrete) can be used for normal backfill.
- **Layer works:** Hardpan calcrete and colluvium are of G6 quality and are suitable for the construction of layer works up to sub- and base- course level for lightly trafficked roads.
- **Wearing course for gravel roads:** no material present on site are 100% suitable for gravel wearing course.
- **Excavation conditions:** Due to the consistency and composition of the soil present on site, the use of such soil is not economically viable. Excavation of soils would require a TLB (rated at 55kW minimum) or a 30 ton excavator will be required for the excavation of the very dense hardpan calcrete which needs to be removed and thus, adequate financial provision must be made for hard rock excavation. Sidewalls of excavations may be susceptible to collapse. Precautionary measures must be provided to protect workmen in these excavations - these measures may include shoring the excavations or sloping the sides to flatter than 1(V):2(H).
- **Land slope:** Average slope across 66% of the site is between 2 – 6% which is considered favourable for urban development whereas the remaining 34% (with a slope of less than 2%) will require design considerations due to potential reduced flow rates of liquids within these areas.
- **Presence of Cemetery Site and Waste Water Facilities:** future development must comply with legal requirements to mitigate negative impact of these facilities on the receiving environment and proposed residential development.
- **Dune stability:** the very loose sand present in certain zones of the site will make residential development difficult and thus, careful consideration must be given to placement of houses in such areas and to ensure that impact on the receiving environment is minimized. Vegetation must be re-established to ensure that the dunes remain stable.

Services

Due to the nature and size of the proposed development, an investigation into the capacities and status of existing bulk services and future bulk services required to supply the development was needed and undertaken. Bvi Consulting Engineer's compiled a Bulk Services Report (**Appendix 4B**), investigating the status of existing services and proposing recommendations relative to the construction and / or upgrade of existing infrastructure to service the proposed housing development.

Water

The calculated, current annual average daily demand (AADD) is 1127m³/day. As per the Engineer's Services Report, services associated with water supply are inadequate to service the existing Groblershoop Settlement and thus, need to be upgraded. Moreover, as per the Engineer, *"the infrastructure will have to be upgraded regardless of the implementation of the Groblershoop 1500 houses development in order to meet current and expected future needs. The upgrading should be done in such a way as to take into consideration the Groblershoop 1500 houses development"*.

Upgrades to the river pump station, raw water storage infrastructure, water treatment plant, clear water

sump, existing old town booster pump station, existing Sternham Booster pump station, existing abattoir (Witblok) Booster Pump Station, and a new 1500 erven booster pump station and infrastructure (including construction of a new 1.7ML potable water) were recommended to adequately service the proposed development. In conclusion, the entire water supply system needs to be upgraded as the proposed development will almost double the AADD (Appendix 4B).

Sewerage

Households within the existing Groblershoop Settlement are serviced by VIP toilets as no bulk sewer infrastructure is present. Current calculated sewer flow per day is 889 600l/day. Sewerage-related infrastructure is not present to service the existing demand. According to the Engineer's Services Report, *"the infrastructure will have to be upgraded regardless of the implementation of the Groblershoop 1500 houses development in order to meet current and expected future needs. The upgrading should be done in such a way as to take into consideration the Groblershoop 1500 houses development"*. As per the Engineer's Report, upgrades as recommended by the Engineer include the construction / upgrade of;

- A new Sewer Pump Station (for existing Settlement);
- A new bulk sewer infrastructure (for the proposed development) comprised of:
 - Two (2) new sewer pump stations (2 x 40l/s);
 - New 200mm rising mains (1.3km and 2.1km); and
 - Upgrading of existing 670 kL/day WWTW facility to be upgraded 1.6 ML WWTW facility.

Roads

Access to the development will be from the existing Residential Collector Streets (Class 4b). The Engineer concluded that no problems are foreseen regarding roads and access.

Stormwater

No formal stormwater infrastructure is present within the Brandboom settlement where stormwater runoff is currently draining from the centre of the site. According to the Engineer's Services Report, the guiding principle is that the peak stormwater runoff from the site, post construction, should not exceed the full range of storm return periods (1:2 to 1:50) of the site pre-construction. Stormwater infrastructure must be constructed to:

- Accommodate minor storm events (i.e. 1:5 years) in open channels or side drains of streets;
- Accommodate major storm events (i.e. 1:50 year) through controlled overland flows, aboveground attenuation storage, and berms at the higher end of the site; and
- To prevent pooling of stormwater runoff.

In addition to parameters stipulated in the Engineer's Services Report (Appendix 4B), a Stormwater Management Plan (SWMP) must be designed and compiled to address concerns raised by the I&AP - namely the potential flow of sewage- and/or solid waste-contaminated stormwater runoff from the development into the drainage lines and subsequently the Orange River. Therefore, it is recommended that the proposed development be supported/ authorized subject to the compilation of a SWMP which includes required engineering parameters (Appendix 4B) and the management of potentially sewage- and/or solid waste-contaminated stormwater runoff.

Solid waste removal

According to the Integrated Development Plan, 2019 – 2022, the proportion of households in the !Kheis Municipality whose refuse is removed by a local authority at least once a week increased from 48.1% in 1996 to 62.0% in 2016. However, there was an increase in the proportion of households that have no rubbish disposal from 1.6% in 1996 to 7.6% in 2016. The IDP also states that in 2016, 21.1% of households

dispose of waste via their own refuse dump. This is evident in the large amounts of domestic waste observed dumped within the proposed site for development. The urban solid waste and building rubble was identified as a potential impact to the aquatic features present within the proposed site for development.

Electricity

As per INEP Guidelines, the expected additional load of the proposed development will initially be 162KVA. The proposed site for development falls within the Eskom Distribution area and existing electrified households purchase electricity directly from Eskom. Currently, the bulk connection to the Brandboom settlement is via a 22kV overhead line from the Eskom 10MVA Groblershoop substation – which is in the process of being upgraded to a 20MVA. The existing overhead feeder will only be able to accommodate the future additional 660kVA load once the Groblershoop 10MVA substation has been commissioned. It must be noted that the internal electrical network extension can only be carried out by Eskom after formulation processes have been completed as the area falls under Eskom's jurisdiction. As per the Engineer's Report, *upgrading and extension of the existing bulk electrical supply system is required by Eskom, the extension of the electrical system will not be a problem as the main sub-station in Groblershoop is currently being upgraded and will be commissioned in December 2020*

Conclusion

The specialist studies and the information provided within the EIA Report, indicates that the proposed Groblershoop Housing development does not pose any significant impacts should the proposed mitigation measures be implemented. However, as per the specialist assessments, site visits, and comments received from registered I&APs, the failure of the wastewater treatment works and illegal dumping remain a key issue which must be addressed with the implementation of a proper waste management plan. It must be noted that existing water-supply and sewage services do not adequately address / service the existing demand of the Groblershoop Settlement. Consequently, the proposed project will increase the pressure placed on existing municipal services and therefore, if a waste management plan is not effectively implemented, the current lack of sewage and solid waste management may negatively impact the environment and socioeconomic development in the Groblershoop area.

According to the Botanical Specialist (Appendix 6A), “*with the available information it is recommended that project be approved, with the proposed mitigation actions*”. According to the Heritage Impact Assessment (Appendix 6B), no significant heritage sites or features were identified within the proposed development footprint however, a graveyard (graded as IIIB and of High Local Significance) is present within the proposed site for development. The graveyard must be fenced off with the inclusion of a 50 m buffer/safety zone. The Heritage Specialists recommended that the proposed development could continue due to the absence of any heritage resources of conservational significance. The proposed site for development is located within an area of low palaeontological significance. Thus, no further palaeontological heritage studies, ground-truthing, and/or specialist mitigation are required. As per the Freshwater Impact Assessment (Appendix 6C), the Freshwater Specialist concluded that identified impacts will have a High / Medium impact on the aquatic features within the proposed site for development however, these impacts can be reduced to a Low impact should proposed mitigation measures be implemented. Impacts associated with the condition of the sewage and solid waste management infrastructure have been identified as impacts which need to be addressed with the implementation of a proper waste management plan. This may including implementing recommendations detailed in the Engineer's Services Report (Appendix 4B). According to the Geo-technical Assessment (Appendix 6D), the proposed site for development was regarded as being of intermediate suitability for the proposed residential development where founding conditions were designated as R, S, S1, and S2.

Considering all the information, it is envisaged that this proposed Groblershoop Housing Development will have a low negative impact on the environment, and the socio-economic benefits are expected to greatly outweigh any negative impacts, should the mitigation measures as recommended by the various specialists and detailed in Section 9 and the Environmental Management Programme (Appendix 9) be implemented. It must be noted that a proper waste management plan², addressing the functioning of the wastewater treatment works and solid waste removal, as well as a Traffic Impact Assessment (TIA), must be added as conditions to the granting of the environmental authorisation. This waste management plan must be implemented to effectively address the expected increase in pressure on existing services. In addition to parameters stipulated in the Engineer's Services Report (Appendix 4B), a Stormwater Management Plan (SWMP) must be designed and compiled to address concerns raised by the I&AP - namely the potential flow of sewage- and/or solid waste-contaminated stormwater runoff from the development into the drainage lines and subsequently the Orange River. Therefore, it is recommended that the proposed development be supported/ authorized subject to the compilation of a SWMP which includes required engineering parameters (Appendix 4B) and the management of potentially sewage- and/or solid waste-contaminated stormwater runoff.

It is therefore recommended that the proposed Boegoeberg Housing Development (**Alternative 4**) be supported and be authorised with the necessary conditions of approval, subject to the compilation of a stormwater management plan, waste management plan (addressing sewage and solid waste management), and the undertaking of a traffic impact assessment, along with the implementation of recommendations / mitigation measures proposed by Specialists (Appendices 6A-D) and included in the EMP_r (Appendix 9).

²In the context of this Final EIR, "**waste management plan**" refers to a plan addressing the wastewater treatment works and solid waste removal infrastructure / management required to service the proposed development. Please refer to Appendix 4B (Engineer's Services Report) for more information on required infrastructure. As per the specialist assessments, site visits, and comments received from registered I&APs, the management of sewage and solid waste remains a key issue which must be addressed with the implementation of a proper waste management plan.

CONTENTS

1. INTRODUCTION.....	21
1.2 SCOPE OF WORK.....	21
1.3 ASSUMPTIONS AND LIMITATIONS.....	22
2. NEED AND DESIRABILITY	24
2.1 NEED	24
2.2 DESIRABILITY.....	26
2.3 INTEGRATED PLANNING.....	28
3. LEGAL REQUIREMENTS	30
3.1 THE CONSTITUTION OF THE REPUBLIC OF SOUTH AFRICA.....	30
3.2 NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT 107 OF 1998).....	30
3.3 NATIONAL HERITAGE RESOURCES ACT	35
3.4 EIA GUIDELINE AND INFORMATION DOCUMENT SERIES.....	35
3.6 NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT	36
3.7 NATIONAL FORESTS ACT.....	36
3.8 NORTHERN CAPE CONSERVATION ACT, ACT 09 OF 2009	37
3.8 SPATIAL PLANNING AND LAND USE MANAGEMENT ACT, ACT 16 OF 2013.....	37
4. ALTERNATIVES	38
4.1 ALTERNATIVE 1	38
4.2 ALTERNATIVE 2	38
4.3 ALTERNATIVE 3	38
4.4 ALTERNATIVE 4 (Preferred Layout).....	39
4.1 OTHER ALTERNATIVES.....	39
4.2 NO-GO ALTERNATIVE	40
5. SITE DESCRIPTION	41
5.1 LOCATION	41
5.2 VEGETATION	48
5.3 FRESHWATER.....	51
5.4 GEOLOGY.....	52
5.5 GEOHYDROLOGY	53
5.6 CLIMATE	53
5.7 SOCIO-ECONOMIC CONTEXT	54
5.8 HERITAGE FEATURES	57
6. SERVICES.....	61
6.1 WATER	61
6.2 SEWER	63

6.3	ROADS.....	65
6.4	STORMWATER	65
6.5	SOLID WASTE (REFUSE) REMOVAL	66
6.6	ELECTRICITY	66
7.	PROCESS TO DATE	67
6.1	TASKS UNDERTAKEN TO DATE	67
6.2	TASKS TO BE UNDERTAKEN DURING THE EIA PHASE	69
6.3	PROFESSIONAL TEAM	70
6.4	PUBLIC PARTICIPATION.....	71
7.4.1	PUBLIC PARTICIPATION UNDERTAKEN DURING SCOPING PHASE:	71
7.4.2	PUBLIC PARTICIPATION UNDERAKEN DURING THE EIA PHASE:	73
7.4.3	INTERESTED AND AFFECTED PARTIES	73
8.	ENVIRONMENTAL ISSUES AND POTENTIAL IMPACTS	74
	Mammals.....	75
	Avifauna.....	75
	Reptile & amphibians	76
7.1	CRITERIA FOR SPECIALIST ASSESSMENT OF IMPACTS	80
9.2	BRIEFS FOR SPECIALIST STUDIES TO BE UNDERTAKEN AS PART OF THE EIA.....	81
9.2.1	BOTANICAL ASSESSMENT	81
9.2.3	FRESHWATER ASSESSMENT	82
9.2.4	GEO-TECHNICAL ASSESSMENT	83
10.1.1	KEY FINDINGS	84
	Mammals.....	89
	Avifauna.....	89
	Reptile & amphibians	89
10.1.2	IMPACT ASSESSMENT	89
	Direct impacts.....	89
10.1.3	MITIGATION MEASURES	90
10.1.4	CONCLUSION	90
10.2.1	KEY FINDINGS	91
10.2.2	IMPACT ASSESSMENT	92
10.2.3	MITIGATION MEASURES	92
10.2.4	CONCLUSION	93
10.3.1	KEY FINDINGS	93
10.3.2	IMPACT ASSESSMENT	96
10.3.3	MITIGATION MEASURES	96
10.3.4	CONCLUSION	96

10.4.1	KEY FINDINGS	97
10.4.2	RECOMMENDATIONS	99
7.	SUMMARY OF IMPACTS	103
8.	RECOMMENDATIONS	105
9.	CONCLUSIONS	108
10.	DETAILS AND EXPERTISE OF THE EAP	110

FIGURES

Figure 1:	1: 50 000 Locality Map showing the proposed Groblershoop Housing Development.	23
Figure 2.	Socioeconomic status associated with the proposed Groblershoop Housing Development.	25
Figure 3:	Google Earth image of the surrounding landscape, showing the location of the proposed development in location with the existing residential areas.	27
Figure 5.	Groblershoop Development Framework. Source: SDF, (2014).	29
Figure 5:	The EIA Process. Currently, this process is in the 'EIA Phase – Compile draft Environmental Impact Report (EIR) and draft CEMP and OEMP', as outlined in red.	34
Figure 6.	Disturbed areas associated with the proposed site for development (outlined in yellow). Source: Botanical Impact Assessment (Appendix 6A).	41
Figure 7.	Raw sewage is overflowing from the trench onto the open ground within the proposed site for development – refer to Figure 6 above. This flow is clearly visible from the Google Earth image ...	42
Figure 7.	Map referring to GPS co-ordinates.	43
Figure 9.	Taken from point 1, looking west over the site. Notice extensive dumping on the site.	44
Figure 10.	Taken from point 2. The extensive dumping on this part of the site is clearly visible.	44
Figure 11.	Overview of vegetation present on site looking over the western section of the proposed site.	45
Figure 12.	Vegetation and informal housing, previously established, looking in a north-western direction.	45
Figure 13.	Overview of site looking east over the site.	46
Figure 14.	Taken from point 4, looking west. The raw sewage flowing in an open trench is visible in this image.	46
Figure 14.	Taken from point 5, where the raw sewage is overflowing from the trench onto the open ground. This flow is clearly visible from the Google Earth image	47
Figure 16:	Proposed Groblershoop Site located in the Bushmanland Arid Grassland, a Least Threatened ecosystem type.	48
Figure 17.	Critical Biodiversity Area (CBA) associated with the Groblershoop study area (outlined in red).	50
Figure 17.	Freshwater areas associated with the proposed site for development.	52
Figure 19.	Geological features associated with the Groblershoop site.	53
Figure 20:	Sectoral composition !Kheis (2017-2018)(Source !Kheis Municipality IDP (2019 – 2022).	55
Figure 21.	Results of Green Drop Score (2010/11)	56
Figure 22.	Neglected graveyards present within the proposed site for development. Source: Mr. Jan Engelbrecht (Heritage Specialist)	59
Figure 23.	Additional image of neglected graveyards present within the proposed site for development. Source: Mr. Jan Engelbrecht (Heritage Specialist)	59
Figure 24.	Additional image of neglected graveyards amongst general and hazardous waste illegally dumped within the proposed site for development. Source: Mr. Jan Engelbrecht (Heritage Specialist)	60
Figure 25.	Current bulk water supply and water reticulation. Source: Engineer's Service Report (Appendix 4B).	62
Figure 26.	Recommended upgrades to the existing water services for the proposed development of the Groblershoop Housing Project. Source: Engineer's Service Report (Appendix 4B).	63

Figure 27. Existing sewage infrastructure servicing the existing Groblershoop Settlement. Source: Engineer's Service Report (Appendix 4B).....	64
Figure 28. Proposed sewage infrastructure upgrade as recommended by the Engineer. Source: Engineer's Service Report (Appendix 4B).....	65
Figure 29. Summary of the EIA process and public participation process. The red indicates the stages where the competent authority will be consulted during the process.....	69
Figure 27: Recorded heritage within the proposed site for the Groblershoop Housing Development. Source: <i>Figure 9 of the Heritage Impact Assessment - Appendix 6B</i> , Ubique Heritage Consultants. GBH011 represents graveyards present within the proposed development footprint at: 28° 54' 29.56"S; 21° 59' 41.24" E	91
Figure 31. Aquatic features associated with the site. Source: Freshwater Report, Dr van Driel.	95
Figure 32. Geotechnical characteristics associated with the proposed site for development. Source: Geotechnical Investigation (Appendix 6D).	99

TABLE

Table 1. Coordinates of corner points of the Groblershoop study area	42
Table 2. Social and Economic Aspect	57
Table 3. Tasks undertaken in the EIA to date and way forward	67
Table 3. Members of the professional team	70
Table 5. Protected, non-protected, and alien invasive plant species recorded during the site visit (Appendix 6A).....	85
Table 6. NCNCA protected plant species observed within the proposed development footprint. Source: Botanical Impact Assessment (Appendix 6A).	87
Table 5. Summary of all impacts	103

APPENDICES

APPENDIX 1:	LETTERS FROM AUTHORITIES
APPENDIX 1A:	ACKNOWLEDGEMENT FROM DENC
APPENDIX 1B:	ACCEPTANCE OF SCOPING REPORT AND PLAN OF STUDY
APPENDIX 2:	SITE LAYOUT PLANS
APPENDIX 2A:	ALTERNATIVE 1 LAYOUT PLAN
APPENDIX 2B:	ALTERNATIVE 2 LAYOUT PLAN
APPENDIX 2C:	ALTERNATIVE 3 LAYOUT PLAN
APPENDIX 2D:	PREFERRED ALTERNATIVE 4 LAYOUT PLAN
APPENDIX 3:	PUBLIC PARTICIPATION PROCESS
APPENDIX 3A:	INTERESTED AND AFFECTED PARTIES LIST
APPENDIX 3B:	PROOF OF ADVERTISEMENT
APPENDIX 3C:	PROOF OF NOTIFICATIONS
APPENDIX 3D:	PROOF OF SITE POSTERS AND LETTER DROPS
APPENDIX 3E:	COMMENTS AND RESPONSE REPORT
APPENDIX 4:	SPLUMA AND ENGINEERING AND SERVICES REPORTS
APPENDIX 4A:	SPLUMA APPLICATION
APPENDIX 4B:	ENGINEERING SERVICES REPORT
APPENDIX 5:	MAPS
APPENDIX 5A:	LOCALITY MAP
APPENDIX 5B:	BIODIVERSITY OVERLAY MAPS
APPENDIX 6:	SPECIALIST STUDIES
APPENDIX 6A:	BOTANICAL IMPACT ASSESSMENT
APPENDIX 6B:	HERITAGE IMPACT ASSESSMENT
APPENDIX 6C:	FRESHWATER ASSESSMENT
APPENDIX 6D:	GEO-TECHNICAL REPORT
APPENDIX 7:	IMPACT ASSESSMENT SUMMARY
APPENDIX 8:	SITE OVERVIEW PHOTOGRAPHS
APPENDIX 9:	ENVIRONMENTAL MANAGEMENT PROGRAMME

ACRONYMS

BGIS	Biodiversity Geographic Information System
CBA	Critical Biodiversity Area
DEA	Department of Environmental Affairs
DEAT	Department of Environmental Affairs and Tourism
DENC	Department of Environment and Nature Conservation (Northern Cape)
DWS	Department of Water and Sanitation
EAP	Environmental Assessment Practitioner
ECA	Environment Conservation Act (Act No. 73 of 1989)
EIA	Environmental Impact Assessment
EIR	Environmental Impact Assessment Report
EMP	Environmental Management Programme
HIA	Heritage Impact Assessment
I&APs	Interested and Affected Parties
NCNCA	Northern Cape Nature Conservation (Act 9 of 2009)
NEMA	National Environmental Management Act (Act No. 107 of 1998)
NEMBA	National Environmental Management: Biodiversity Act (Act No. 10 of 2004)
NFA	National Forests Act (NFA) of 1998 (Act 84 of 1998)
NHRA	National Heritage Resources Act (Act No. 25 of 1999)
NID	Notice of Intent to Develop
NWA	National Water Act
OESA	Other Ecological Support Area
PIA	Palaeontological Impact Assessment
SAHRA	South African Heritage Resources Agency
SANBI	South African National Biodiversity Institute
SDF	Spatial Development Framework
TIA	Traffic Impact Assessment
WULA	Water Use Licence Application

1. INTRODUCTION

1.1 BACKGROUND

Consideration is being given to the development of a new township, consisting of approximately 1500 erven, including associated infrastructure, on Portion 16 of Farm 48, Groblershoop. The total area to be developed measures 95 (ninety-five) hectares. The site is located in Ward 3 of the !Kheis Local Municipality, ZF Mgcawu District Municipality. The site is located to the south-east of Groblershoop, to the west of the N10, in the !Kheis Local Municipality, Northern Cape. Site co-ordinates: Proposed site: 28°54'33.90"S, 21°59'44.90"E. The proposed development will be comprised of:

According to the SPLUMA Application Report (**Appendix 4A**), the erven are broken down as follows:

- 1500 x Residential Zone I units: dwelling house/ residential house containing one residential unit - a self-contained interlinking group of rooms for the accommodation and housing of a single family, or a maximum of four persons;
- 16 x Business Zone I: business building / premises which will be used as shops and/or offices (e.g. professional offices, places of assembly, doctors consulting rooms);
- 2 x Institutional Zone I: place of instruction / education (e.g. primary, secondary, and/or special schools);
- 3 x Institutional Zone II: place of worship (e.g. places for practising religion);
- 15 x Open Space II: public open space to be utilized by the public as an open space, park, garden, playground, or recreational site;
- 2 x Open Space III: private open space (i.e. scheme for use as a private site for sport, playing, rest and recreation facilities or as an ornamental garden or pleasure-garden, provided that the land is under the long-term management of a private person or authority, and also a cemetery or show grounds, whether public or private);
- 1 x Transport Zone I: public street reserved for street purposes and includes facilities for public transport;

The applicant is !Kheis Local Municipality who will undertake the activity should it be approved. EnviroAfrica CC has been appointed as the independent environmental assessment practitioner (EAP) responsible for undertaking the relevant EIA and the Public Participation Process required in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA).

The Application Form and Draft Scoping Report was submitted to the DENC on the **29th July 2020**. The Final Scoping Report and Plan of Study for this EIA was submitted to the Department of Environment and Nature Conservation (DENC) on the **8th October 2020**. The Scoping Report and Plan of Study for EIA were approved by DENC on the **11th December 2020** and EnviroAfrica were advised to proceed with the EIA process (**Appendix 1B**).

1.2 SCOPE OF WORK

There has been no particular brief given to the consultants to undertake this study. However, the scope of the study has been determined with reference to the requirements of the relevant legislation and undertaken in terms of the Integrated Environmental Management Information Series on Environmental Impact Reporting (2004) issued by DEAT and the Information Document on Requirements with respect to the EIA Process (January 2003), issued by the Department of Environmental Affairs and Development Planning of the Western Cape.

The basic scope of work will include the following:

- Review of all information.
- Participating in the progress of the development proposal.
- Scoping (identification of significant issues).
- Assessment of anticipated impacts.
- Identification of suitable mitigation measures to reduce negative impacts and enhance positive impacts.
- Submission for decision.

One of the crucial aims of an EIA is to ensure that the demands of sustainable development are met on a project level, within the context of the greater area. The most common definition of sustainable development is development that meets the needs of the present while not compromising the needs of future generations.

This EIA is therefore being undertaken with sustainable development as a goal. The assessment will look at the impacts of the proposals on the environment and assess the significance of these, as well as propose mitigation measures, as required, to reduce anticipated impacts to acceptable levels.

1.3 ASSUMPTIONS AND LIMITATIONS

The assumption is made that the information on which the report is based (i.e. specialist studies, project information, information given by the applicant and client, as well as mapping tools including *CapeFarmMapper* and *BGIS*) is correct.

Future management of the site is essential, and the assumption is made that the mitigation measures recommended by the specialists will be implemented on a long-term basis. This has a major bearing on the reliability of the predictions of significance of impact.

1.4 DESCRIPTION OF THE PROPOSED ACTIVITY

The proposed site is located to the south-east of Groblershoop, to the west of the N10, in the !Kheis Local Municipality, Northern Cape. Site co-ordinates: Proposed site: 28° 54' 33.90" S, 21° 59' 44.90" E.

The proposed site of the residential development is generally undeveloped and generally near natural. The northern and central part of the site, especially near the existing tracks and closer to the town, are disturbed. According to the Vegetation map of South Africa, Lesotho and Swaziland (Mucina & Rutherford, 2006, as updated in the 2012 beta version) only one broad vegetation type is expected on the majority of the proposed site, namely Bushmanland Arid Grassland. Gordonia Duneveld is identified on SANBI BGIS adjacent to the site to the south-west, and Lower Gariep Alluvial Vegetation to the north of the site (Orange River).

The proposed site is the only viable site available and the only one that was investigated in this application. Housing is a constant need in the municipality, with other sites possibly earmarked for residential development that will not form part of this application. The construction of the proposed housing development in another location would increase the construction footprint and therefore, the impact on the environment.

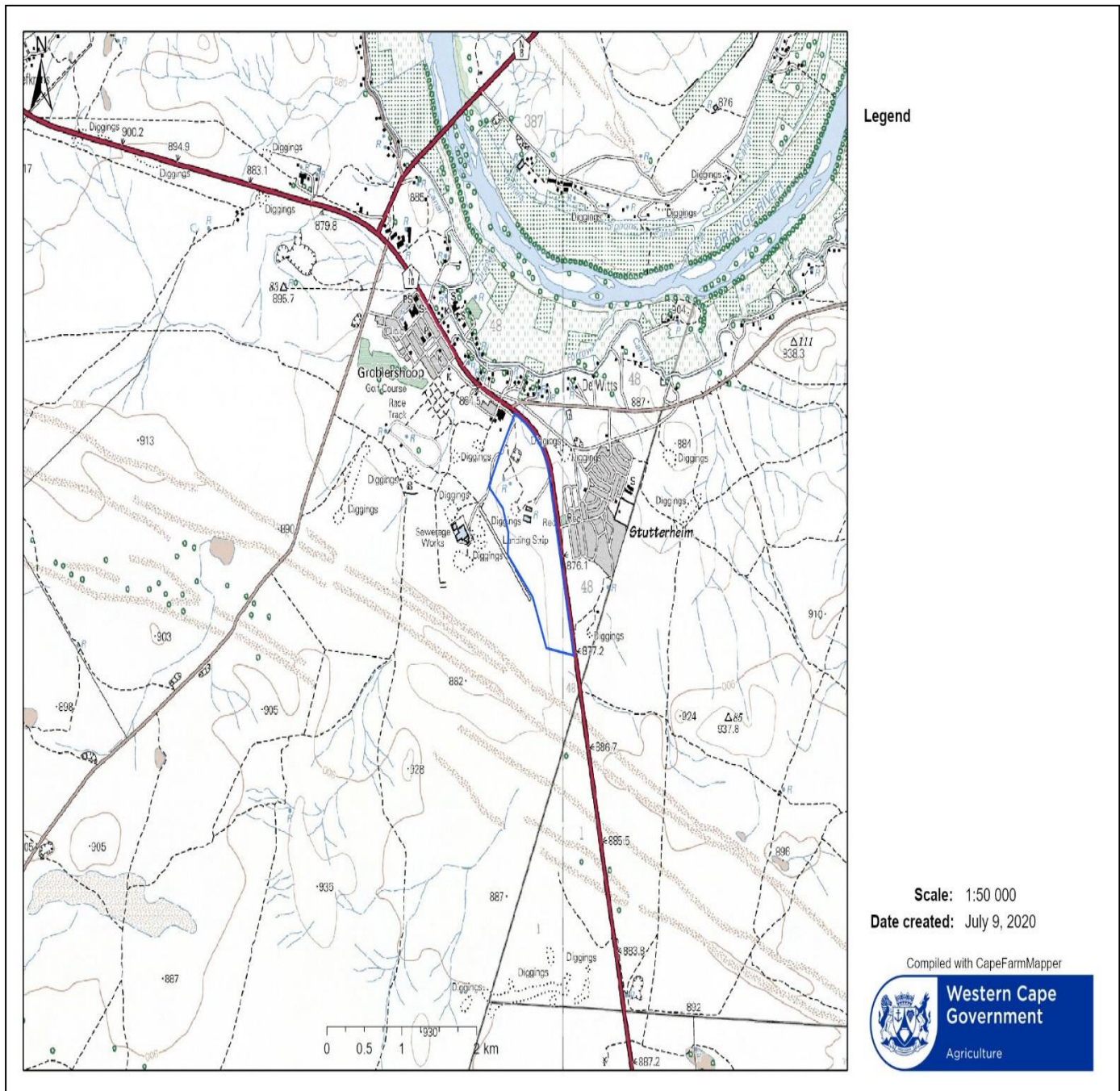


Figure 1: 1: 50 000 Locality Map showing the proposed Groblersshoop Housing Development.

2. NEED AND DESIRABILITY

In terms of the National Environmental Management Act, as amended, EIA 2014 regulations the Scoping/EIA report must provide a description of the need and desirability of the proposed activity. The consideration of “need and desirability” in EIA decision-making requires the consideration of the strategic context of the development proposal along with the broader societal needs and the public interest.

The need for and the desirability of a proposed development forms a key component of any EIA application. The consideration of proposed developments in context of the various spatial planning tools and policy applicable to the study area forms an integral part of the present environmental processes. The “need and desirability” will be determined by considering the broader community’s needs and interests as reflected in a credible IDP, SDF and EMF for the area.

While the concept of need and desirability relates to the *type* of development being proposed, essentially, the concept of need and desirability can be explained in terms of the general meaning of its two components in which *need* refers to *time* and *desirability* to *place* – i.e. is this the right time and is it the right place for locating the type of land-use/activity being proposed? Need and desirability can be equated to *wise use of land* – i.e. the question of what the most sustainable use of land is. The impact of development on people’s health and well-being, as well as its impact on natural and cultural areas, and therefore its desirability, will also be assessed during the Environmental Impact Report phase.

2.1 NEED

Housing is a national need, including in the !Kheis Local Municipality.

The !Kheis Local Municipality aims to promote socioeconomic development through the eradication of backlogs associated with housing, water and sanitation, and electricity, as well as improve basic services within Groblersshoop. In order to meet the growing needs of the community within Groblersshoop, the Council resolved that a project business plan be submitted to Co-operative Governance, Human Settlements and Traditional Affairs (COGHSTA) for this proposed development. As per the !Kheis Integrated Development Plan (IDP) 2019/2020, a key performance indicator includes the provision of infrastructure and basic service through securing suitable land for human settlement projects, where suitable land for this purpose was previously identified in Groblersshoop, Boegoeberg, Topline, Wegdraai, Grootdrink, Gariep, and Opwag. The provision of affordable housing remains a high priority for the Municipality which will restore the dignity of disadvantaged people by providing shelter and access to basic human rights as enshrined in the Constitution of South Africa.

The proposed Groblersshoop Housing development is in line with the !Kheis IDPs key strategic and development objectives, namely to improve and maintain basic service delivery through specific infrastructural projects including human settlements and basic services, in the poverty-stricken Groblersshoop Township. According to the SDF, the population in Groblersshoop increased from 741 (in 2001) to 4938 in 2011 (where 50% of the population are male and 50% female). Therefore, this community requires formalized, state-instituted housing, and associated, infrastructure. The proposed development will distribute the density of the population, improve community member’s standard of living, as well as access to essential services including roads, electricity, water supply, appropriate sewage disposal infrastructure, and environmental health in the area. Therefore, the proposed development will enable adequate housing to be constructed, thereby promoting access to basic service delivery as well as socioeconomic development in the Groblersshoop Township and its surroundings. !Kheis Local Municipality is committed to the vision of the National Government of which it committed itself towards accelerating

shared growth to halve poverty and unemployment and promote social inclusions. Housing is one of the social inclusions in this vision.

The majority of the KLM population is located in five settlements, namely: Grootdrink, Topline, Wegdraai, Groblershoop and Boegoeberg, with the largest of those settlements being Groblershoop, Grootdrink and Wegdraai. With regards to the functional age groups, 60% of KLM's population is of working age (15---64). Grootdrink (40%) and Boegoeberg (40%) have the highest percentages of population aged between 0 and 14, which is decidedly higher than the district percentage of 28%. Education levels and school attendance have increased in KLM. Grootdrink has the lowest percentage individuals with Gr.12 at 9,1%, while Topline has the highest percentage of individuals with 'no schooling' at 17,5%. In comparison Groblershoop has the highest percentage of individuals with Gr.12 (18,5%) and individuals with higher education (1,7%).

Figure 2. Socioeconomic status associated with the proposed Groblershoop Housing Development.



The

proposed development will distribute the density of the population, improve community member's standard of living, as well as access to essential services including water, electricity, roads, appropriate waste management (e.g. sewage disposal infrastructure), and environmental health in the area. Therefore, the proposed development will enable adequate housing to be constructed, thereby promoting access to basic service delivery as well as socioeconomic development in Groblershoop and its surroundings. !Kheis Local Municipality is committed to the vision of the National Government of which it committed itself towards accelerating shared growth to halve poverty and unemployment and promote social inclusions. Housing forms an integral component of this vision.

2.2 DESIRABILITY

The following factors determine the desirability of the area for the proposed residential development. As per the Needs and Desirability Report, prepared by Macroplan (August 2020), approximately 190 to 200 families live on the proposed site for development and are in dire need for formalization. It is clear from the number of existing informal houses erected on the property, that this study area is indeed habitable and that there is an urgent need for residential erven within the sub-economic market.

2.2.1 LOCATION AND ACCESSIBILITY

The proposed location is considered to be a viable option. The proposed site is adjacent to the existing residential area of Groblershoop and the N10, allowing accessibility and linking to the existing services infrastructure. Any upgrades or additional services infrastructure that will be required will be investigated and included in the Environmental impact Report.

Due to the existing settlement, namely the Groblershoop Settlement, the proposed development will expand the housing footprint in the immediate area. The proposed development will tie into existing services, reducing costs and environmental impact associated with the construction of a stand-alone development in an area where surrounding land uses are not in line with the nature of this project. According to the SPLUMA Application Report (**Appendix 4A**), the study area is situated within the urban edge of Groblershoop. Moreover, as per the !Kheis SDF, the portions of land identified for the Groblershoop formalisation and expansion project falls within the urban edge of Groblershoop and has furthermore been earmarked for low-cost housing, as such the development proposal is in line with the spatial vision of Groblershoop.

No other physical characteristics of these properties or environmental constraints which would exclude the site from development.

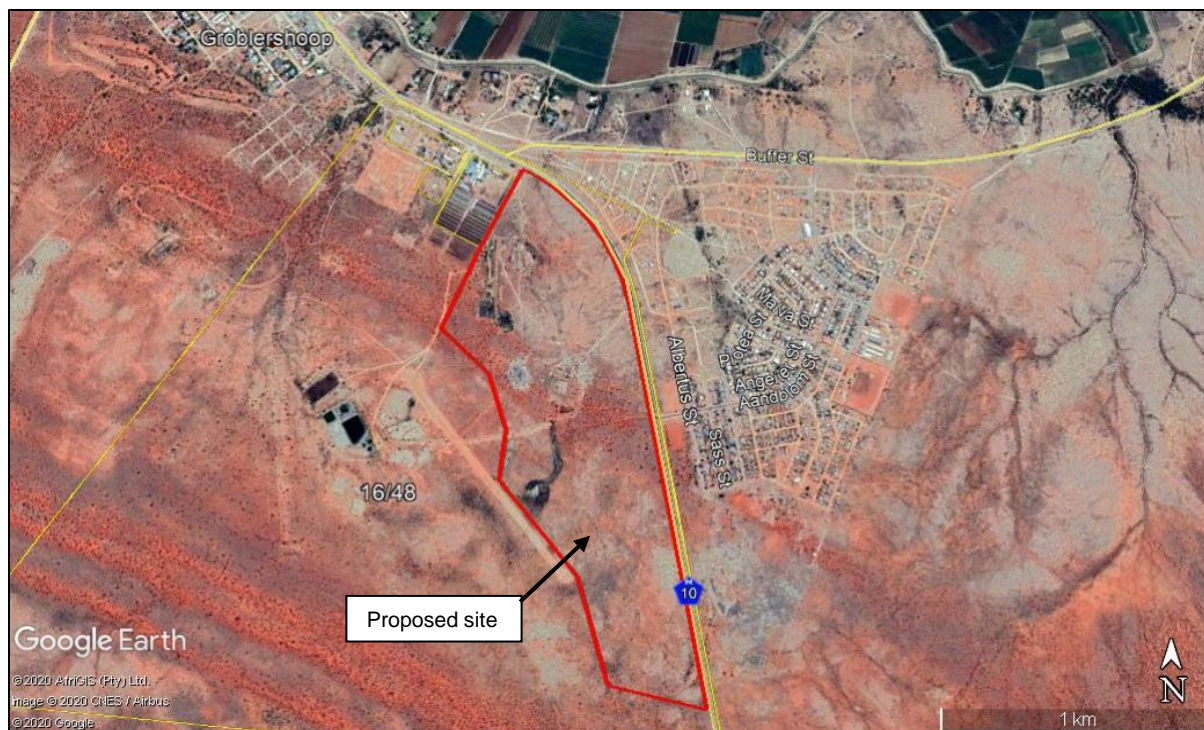


Figure 3: Google Earth image of the surrounding landscape, showing the location of the proposed development in location with the existing residential areas.

2.2.2 COMPATIBILITY WITH THE SURROUNDING AREA

The proposed site is directly adjacent to the existing residential area of Groblershoop. As stated above, this would provide accessibility and allow the proposed development to link to the existing services infrastructure. The proposed site for development is situated adjacent to the existing residential area of Groblershoop (Figure 2). Although undeveloped, the area surrounding the existing residential area is highly disturbed, with numerous incidences of illegal dumping (including general and hazardous waste). Due to the close proximity of the existing Settlement, costs and environmental impacts, associated with the excavation and laying of new pipes, will be avoided as the proposed development will tie in with existing services.

As per the SPLUMA Application, the study area forms part of Portion 16 of the Farm Boegoeberg Settlement, No. 48, which is one of the land portions in municipal ownership that serves as the town commonage of Groblershoop and as a result a contrast between vacant areas and built-up areas can be expected. The study area itself is vacant and covers a large area, with the undeveloped character clearly visible when visiting the study area. The study area is however situated directly adjacent to the community of Sternham and N10 National Road, with the industrial area of Groblershoop bordering to the north. The town of Groblershoop is situated to the north-west of the study area, but not visible from the study area due to the topography of the area. Vacant land can be located to the south of the development site.

As discussed above, the site is not limited by spatial constraints due to future expansion.

2.3 INTEGRATED PLANNING

According To the Department of Environmental Affairs: Integrated Environmental Management Guideline: Guideline on Need and Desirability (2017), when considering how the development may affect or promote justifiable economic and social development, the relevant spatial plans must be considered, including Municipal Integrated Development Plans (IDP), Spatial Development Frameworks (SDF) and Environmental Management Frameworks (EMF).

According to the SPLUMA Application (**Appendix 4A**), stipulates that each Municipality must prepare a SDF that interprets and represents the spatial development vision of the competent Authority. All proposed developments, specifically pertaining to land use change applications within a municipality, must be measured against an approved SDF of such a municipality, which may be seen as the spatial translation of the IDP. The planning legislation states that no land development decision can be made if the proposed development is inconsistent with the municipal spatial development framework. However, the District Municipal Planning Tribunal may depart from the provisions of the SDF only if site-specific circumstances justify a departure from the provisions of such SDF.

The !Kheis SDF was revised in 2016 to align with the principles of the Spatial Planning and Land Use Management Act (Act 16 of 2013) and has since been a valid and weight bearing document for spatial guidance. The SDF of the !Kheis Municipality adheres to the basic SDF requirements as stipulated in the SPLUMA, therefore providing a potential investor with adequate information to plan a development according to the spatial vision of the municipality. Within the !Kheis SDF, the portion of land identified for the Groblershoop Expansion Project falls within the urban edge of Groblershoop and has furthermore been earmarked (See Annexure L) for low-cost housing, as such the development proposal is in line with the spatial vision of Groblershoop

In the !Kheis Municipality Land Development Plan/ Rural Spatial Development Framework (2014), a variety of projects are identified as focus areas in terms of development. These projects stem from the various municipal IDP's and SDF's and one of the outlined areas of focus is that of housing needs in urban and rural areas throughout the district and local municipalities.

As per the SDF, the key issues raised included, but are not limited to:

- Inadequate housing;
- Lack of land for housing and farming in the area where the new informal settlements are the result of new household formation in the area and not in-movement from outside the area;
- A lack of jobs and job-creation opportunities in the area;
- Water quality and supply;
- Water channels are a safety risk for children and livestock
- Dependency of shops located in Groblershoop;
- The lack of facilities for (i) secondary schooling, (ii) sports and recreation, and (iii) where centre where senior citizens can meet; and
- Weak power supply.

According to the Northern Cape Provincial Spatial Development Framework (2019)(NCPsDF), as part of the Spatial Development Strategies for Infrastructure Investment and related objectives it is a set objective that, amongst others, the housing backlog within the province must be eradicated. It is furthermore indicated that, as part of policy alignment with the Spatial Planning Categories, adequate, safe and affordable housing (amongst other objectives) must be met by 2030.

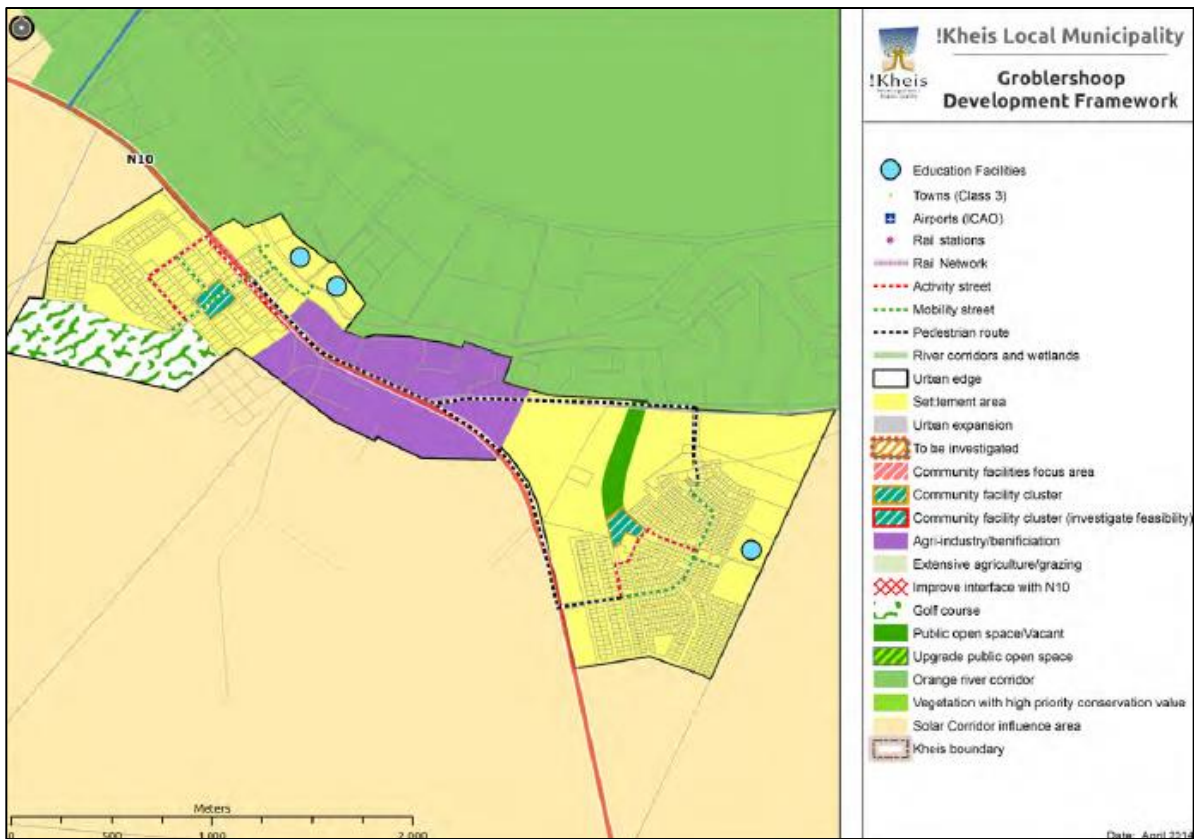


Figure 4. Groblershoop Development Framework. Source: SDF, (2014).

3. LEGAL REQUIREMENTS

The current assessment is being undertaken in terms of the National Environmental Management Act (Act 107 of 1998, NEMA), to be read with section 24 (5): NEMA EIA Regulations 2014. However, the provisions of various other Acts must also be considered within this EIA.

The legislation that is relevant to this study is briefly outlined below.

3.1 THE CONSTITUTION OF THE REPUBLIC OF SOUTH AFRICA

The Constitution of the Republic of South Africa (Act 108 of 1996) states that everyone has a right to a non-threatening environment and that reasonable measures are applied to protect the environment. This includes preventing pollution and promoting conservation and environmentally sustainable development, while promoting justifiable social and economic development.

3.2 NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT 107 OF 1998)

The National Environmental Management Act (Act 107 of 1998) (NEMA), as amended, makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the relevant authorities based on the findings of an environmental assessment. NEMA is a national act, which is enforced by the Department of Environmental Affairs (DEA). These powers are delegated in the Northern Cape to the Department of Environment and Nature Conservation (DE&NC).

On the 04 December 2014 the Minister of Water and Environmental Affairs promulgated regulations in terms of Chapter 5 of the NEMA, namely the EIA Regulations 2014. These were amended on 07 April 2017 (GN No. 326, No. 327 (Listing Notice 1), No. 325 (Listing Notice 2), No. 324 (Listing Notice 3) in Government Gazette No. 40772 of 07 April 2017). Listing Notice 1 and 3 are for a Basic Assessment and Listing Notice 2 for a full Environmental Impact Assessment.

According to the regulations of Section 24(5) of NEMA, authorisation is required for the following listed activities for the proposed agricultural development:

Government Notice R327 (Listing Notice 1) listed activities:

- 9** The development of infrastructure exceeding 1000 metres in length for the bulk transportation of water or storm water;
 - (i) with an internal diameter of 0,36 metres or more; or
 - (ii) with a peak throughput of 120 litres per second or more;
 excluding where;
 - a) such infrastructure is for bulk transportation of water or storm water or storm water drainage inside a road reserve or railway line reserve; or
 - b) where such development will occur within an urban area.
- 10** The development and related operation of infrastructure exceeding 1000 metres in length for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes
 - (i) with an internal diameter of 0,36 metres or more; or
 - (ii) with a peak throughput of 120 litres per second or more;

excluding where;

- (c) such infrastructure is for the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes inside a road reserve or railway line reserve; or
- (d) where such development will occur within an urban area.

12 The development of;

- (i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres;
- (ii) infrastructure or structures with a physical footprint of 100 square metres or more;

where such development occurs;

- (a) within a watercourse;
- (b) in front of a development setback; or
- (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;

19 The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;

- (a) will occur behind a development setback;
- (b) is for maintenance purposes undertaken in accordance with a maintenance management plan; or
- (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies.

24 The development of a road;

- (i) for which an environmental authorisation was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010; or
- (ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres;

but excluding a road;

- (a) which is identified and included in activity 27 in Listing Notice 2 of 2014; or
- (b) where the entire road falls within an urban area; or
- (c) which is 1 kilometre or shorter

27 The clearance of an area of 1 hectares or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for;

- (i) the undertaking of a linear activity; or
- (ii) maintenance purposes undertaken in accordance with a maintenance management plan.

56 The widening of a road by more than 6 metres, or the lengthening of a road by more than 1 kilometre;

- (i) where the existing reserve is wider than 13,5 meters; or
- (ii) where no reserve exists, where the existing road is wider than 8 metres;

excluding where widening or lengthening occur inside urban areas.

Government Notice R325 (Listing notice 2) listed activities:

- 15** The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for;
- (i) the undertaking of a linear activity; or
 - (ii) maintenance purposes undertaken in accordance with a maintenance management plan.

Government Notice R324 (Listing notice 3) listed activities:

- 4** The development of a road wider than 4 metres with a reserve less than 13.5 metres
- 12** The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.
- 14** The development of;
- (i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 10 square metres;
 - (ii) infrastructure or structures with a physical footprint of 10 square metres or more;
- where such development occurs;
- (a) within a watercourse;
 - (b) in front of a development setback; or
 - (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;
- Excluding the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;

The environmental process is being undertaken in distinct phases. The NEMA Application Form and Draft Scoping Report were submitted to DE&NC on the **29th July 2020**. EnviroAfrica, as the appointed Environmental Assessment Practitioner ("EAP"), received the acknowledgement letter for the NEMA Application Form and Draft Scoping Report on the **16th October 2020**. The aim of the Scoping Process was to identify potential issues. The Final Scoping Report and Plan of Study for EIA were submitted to the Department of Environment and Nature Conservation (DE&NC) on the **8th October 2020**. The legislated 43-day decision period ended on the **23rd November 2020**. The Scoping Process was undertaken to identify potential issues. As per section 22 of the EIA Regulations (as amended):

- 22. The competent authority must, within 43 days of receipt of a scoping report—*
- (a) accept the scoping report, with or without conditions, and advise the applicant to proceed or continue with the tasks contemplated in the plan of study for environmental impact assessment; or*
 - (b) refuse environmental authorisation if—*
 - (i) the proposed activity is in conflict with a prohibition contained in legislation; or*
 - (ii) the scoping report does not substantially comply with Appendix 2 to these Regulations or any applicable protocol or minimum information requirements as identified and gazetted by the minister in a*

government notice and the applicant is unwilling or unable to ensure compliance with these requirements within the prescribed timeframe.

Therefore, the Draft EIR was submitted once approval/ acceptance of the Final Scoping Report was received from the competent authority.

The principles of environmental management as set out in section 2 of NEMA have been taken into account. The principles pertinent to this activity include:

- People and their needs will be placed at the forefront while serving their physical, psychological, developmental, cultural and social interests. The activity seeks to provide additional housing, employment and economic development opportunities, which are a local and national need – *the proposed activity is expected to have a beneficial impact on people, especially developmental and social benefits, as well providing additional housing, employment and economic development opportunities.*
- Development will be socially, environmentally and economically sustainable. Where disturbance of ecosystems, loss of biodiversity, pollution and degradation, and landscapes and sites that constitute the nation's cultural heritage cannot be avoided, are minimised and remedied. The impact that the activity will potentially have on these will be considered, and mitigation measures will be put in place - *potential impacts have been identified and considered, and any further potential impacts will be identified during the public participation process. Mitigation measures have been recommended by the various specialist assessment, and are included in the EMP.*
- Where waste cannot be avoided, it will be minimised and remedied through the implementation and adherence of the Environmental Management Programme (EMP) – *the EMP is included in the EIR as Appendix 9.*
- The use of non-renewable natural resources will be responsible and equitable.
- The negative impacts on the environment and on people's environmental rights will be anticipated, investigated and prevented, and where they cannot be prevented, will be minimised and remedied – *potential negative impacts have been identified and considered, and any further potential impacts will be identified during the public participation process. Mitigation measures have been recommended by the various specialist assessment, and are included in the EMP.*
- The interests, needs and values of all interested and affected parties will be taken into account in any decisions through the Public Participation Process – *refer to Section 7.4 below and Appendix 3.*
- The social, economic and environmental impacts of the activity will be considered, assessed and evaluated, including the disadvantages and benefits - *refer to Section 10 below*
- The effects of decisions on all aspects of the environment and all people in the environment will be taken into account, by pursuing what is considered the best practicable environmental option.

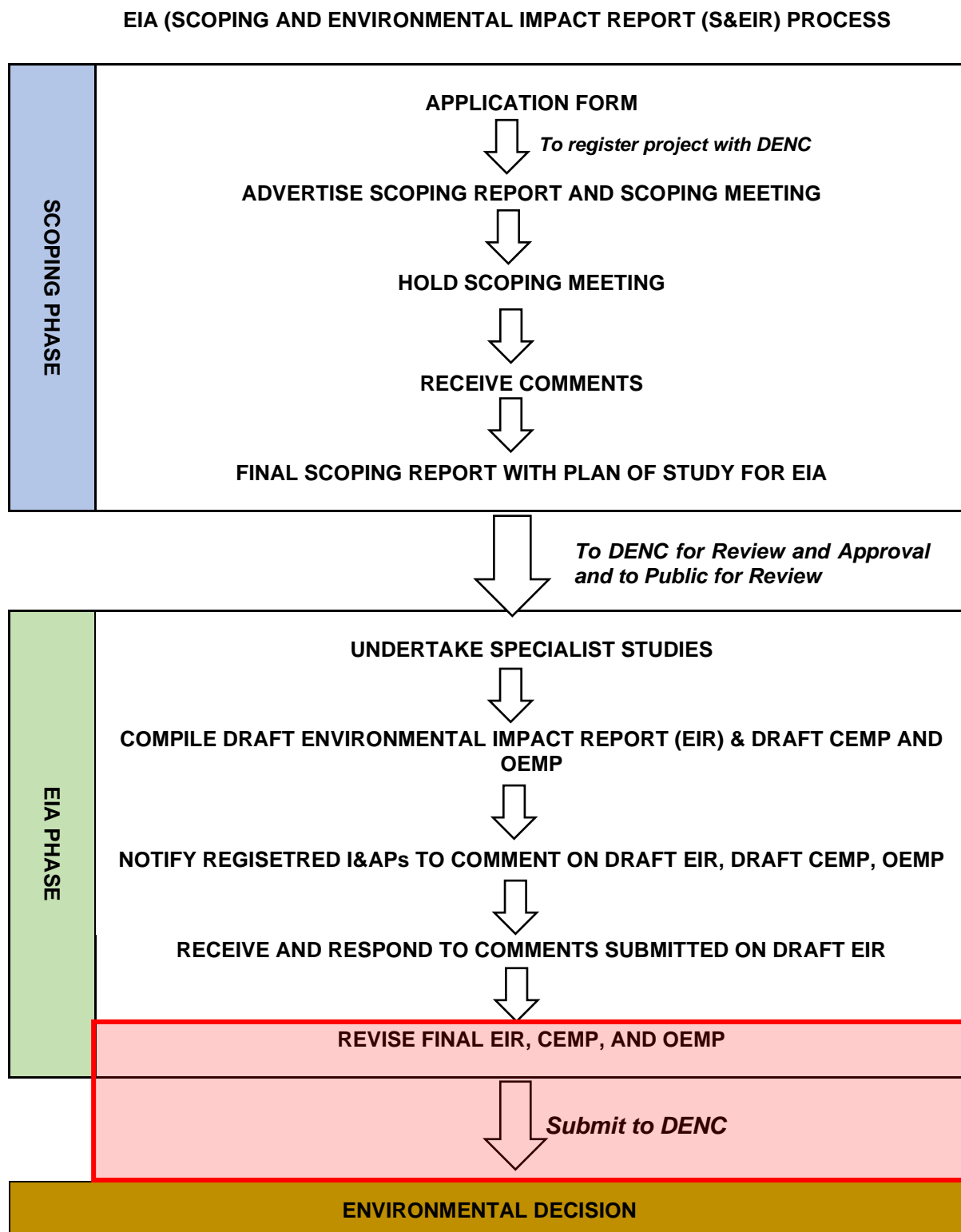


Figure 5: The EIA Process. Currently, this process is in the 'EIA Phase – Revise and Submit Final EIR for decision making, as outlined in red.

3.3 NATIONAL HERITAGE RESOURCES ACT

The protection and management of South Africa's heritage resources are controlled by the National Heritage Resources Act (Act No. 25 of 1999). South African National Heritage Resources Agency (SAHRA) is the enforcing authority.

In terms of Section 38 of the National Heritage Resources Act, SAHRA will require a Heritage Impact Assessment (HIA) where certain categories of development are proposed. Section 38(8) also makes provision for the assessment of heritage impacts as part of an EIA process and indicates that if such an assessment is found to be adequate, a separate HIA is not required.

The National Heritage Resources Act requires relevant authorities to be notified regarding this proposed development, as the following activities are relevant:

- any development or other activity which will change the character of a **site exceeding 5 000 m² in extent**;
- the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length

In accordance with the NHA, a Heritage Impact Assessment (**Appendix 6B**) was undertaken.

Furthermore, in terms of Section 34(1), no person may alter or demolish any structure or part of a structure, which is older than 60 years without a permit issued by the SAHRA, or the responsible resources authority. Nor may anyone destroy, damage, alter, exhume or remove from its original position, or otherwise disturb, any grave or burial ground older than 60 years, which is situated outside a formal cemetery administered by a local authority, without a permit issued by the SAHRA, or a provincial heritage authority, in terms of Section 36 (3). In terms of Section 35 (4), no person may destroy, damage, excavate, alter or remove from its original position, or collect, any archaeological material or object, without a permit issued by the SAHRA, or the responsible resources authority.

3.4 EIA GUIDELINE AND INFORMATION DOCUMENT SERIES

The following are the latest guidelines and information Documents that have been consulted:

- Department of Environmental Affairs and Development Planning's (DEA&DP) *Environmental Impact Assessment Guideline and Information Document Series (Dated: March 2013)*:
 - ✓ *Guideline on Transitional Arrangements*
 - ✓ *Generic Terms of Reference for EAPs and Project Schedules*
 - ✓ *Guideline on Alternatives*
 - ✓ *Guideline on Public Participation*
 - ✓ *Guideline on Exemption Applications*
 - ✓ *Guideline on Appeals*
 - ✓ *Guideline on Need and Desirability*
- Department of Environmental Affairs and Tourism (DEAT) *Integrated Environmental Management Information Series*.

3.5 NATIONAL WATER ACT

Besides the provisions of NEMA for this EIA process, the proposed development may also require authorizations under the National Water Act (Act NO. 36 of 1998). The Department of Water Affairs, who administer that Act, will be a leading role-player in the EIA.

According to the Freshwater Impact Assessment (**Appendix 6C**), the NWA guides the management of water in South Africa as a common resource. The Act aims to regulate the use of water and activities (as defined in Part 4, Section 21 of the NWA), which may impact on water resources through the categorisation of 'listed water uses' encompassing water abstraction and flow attenuation within catchments as well as the potential contamination of water resources, where the DWS is the administering body in this regard.

Defined water use activities require the approval of DWS in the form of a General Authorisation or Water Use Licence authorisation. Government Notice No. 665 of 6 September 2013 provides for General Authorisations for certain specified water use activities in terms of the disposal of wastewater which then do not require a licensing process. There are restrictions on the extent and scale of listed activities for which General Authorisations apply.

Section 22(3) of the National Water Act allows for a responsible authority (DWS) to dispense with the requirement for a Water Use Licence if it is satisfied that the purpose of the Act will be met by the grant of a licence, permit or authorisation under any other law.

Potential water use activities that are of relevance to the proposed Housing Development are:

- Section 21(c): Impeding or diverting the flow of water in a watercourse;
- Section 21(f): Discharge of waste or water containing waste into a water resource through a pipe, canal, sewer or other conduit;
- Section 21(g): Disposing of waste in a manner which may detrimentally impact on a water resource; and
- Section 21(i): Altering the bed, banks, course or characteristics of a watercourse.

3.6 NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT

The National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) (NEMBA) is part of a suite of legislation falling under NEMA, which includes the Protected Areas Act, the Air Quality Act, the Integrated Coastal Management Act and the Waste Act. Chapter 4 of NEMBA deals with threatened and protected ecosystems and species and related threatened processes and restricted activities. The need to protect listed ecosystems is addressed (*Section 54*).

3.7 NATIONAL FORESTS ACT

The National Forests Act, 1998 (Act 84 of 1998) (NFA) makes provisions for the management and conservation of public forests.

In terms of section 15(1) of the National Forests Act, 1998, no person may -

- (a) cut, disturb, damage or destroy any protected tree; or

-
- (b) posses, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree, or any forest product derived from a protected tree, except-
 - (i) under a license granted by the Minister; or
 - (ii) in terms of an exemption from the provisions of this subsection published by the Minister in the Gazette.

3.8 NORTHERN CAPE CONSERVATION ACT, ACT 09 OF 2009

On the 12th of December 2011, the new Northern Cape Nature Conservation Act 9 of 2009 (NCNCA) came into effect, which provides for the sustainable utilization of wild animals, aquatic biota and plants. Schedule 1 and 2 of the Act give extensive lists of specially protected and protected fauna and flora species in accordance with this act. The NCNCA is a very important Act in that it put a whole new emphasis on a number of species not previously protected in terms of legislation.

It also put a new emphasis on the importance of species, even within vegetation classified as “Least Threatened” (in accordance with GN 1002 of 9 December 20011, promulgated in terms of the National Environmental Management Biodiversity Act 10 of 2004). Thus, even though a project may be located within a vegetation type or habitat previously not considered under immediate threat, special care must still be taken to ensure that listed species (fauna & flora) are managed correctly.

3.8 SPATIAL PLANNING AND LAND USE MANAGEMENT ACT, ACT 16 OF 2013

The Spatial Planning and Land Use Management Act 16 of 2013 (**SPLUMA**) is a national law that was passed by Parliament in 2013. SPLUMA provides a framework for spatial planning and land use management in South Africa.

Please note that a SPLUMA Application (**Appendix 4A**) has been submitted.

The subject area falls under the jurisdiction of the local municipality and the appropriate zoning and subdivision would need to be allocated in order to permit the development of the land for the intended purpose.

Consideration of the Northern Cape Provincial Development Spatial Development Framework and the Northern Cape Provincial Growth and Development Strategy will be taken.

4. ALTERNATIVES

The proposed site is the only viable site available at this stage and the only one that will be investigated in this application. Housing is a constant need in the municipality, with other sites possibly earmarked for residential development that will not form part of this application. The current surrounding land use, namely the Groblershoop Settlement, is in line with the nature of the proposed development. The construction of the proposed housing development in another location would increase the construction footprint and therefore, the impact on the environment.

Various layout alternatives were proposed and have been considered during the EIR phase and these are described below.

4.1 ALTERNATIVE 1

Alternative 1 (**Appendix 2A**) is the first of 4 (four) layouts initially proposed. This layout included 1500 erven, with an extent of 95ha, which included:

- Residential Zone I - 1500 units where units
- Business Zone I – six (6);
- Public Open Space – eleven (11);
- Public roads

This alternative was considered a viable option as it provided a sufficient number of housing opportunities. It was initially the municipalities preferred layout however, due to existing services and infrastructure, as well as identified environmental sensitive areas and identification of graves subsequent to the drawing of this concept layout, this layout needed to be amendment (see Alternative 2 below).

4.2 ALTERNATIVE 2

Alternative 2 (**Appendix 2B**) is the second of four (4) layouts initially proposed. This layout included 1500 erven, over an extent of 95ha, which included:

- Residential Zone I - 1500 units where units will not be constructed in the south-western section of the Groblershoop development footprint,
- Business Zone I – seventeen (17)
- Institutional Zone I – one (1);
- Institutional Zone II – three (3); and
- Public Open Space – two (2)

This alternative was considered a viable option as it provided a sufficient number of housing opportunities as well as incorporating a portion of the identified watercourse in the northern section of the site. However, this layout did not account for the grave site (identified subsequent to this concept layout) within the development footprint as well as required open space to ensure a buffer is placed around areas identified as environmentally sensitive. Therefore, this layout needed to be amendment (see Alternative 3 below).

4.3 ALTERNATIVE 3

Alternative 3 (**Appendix 2C**) is the third of four (4) layouts proposed. This layout included 1500 erven, over an extent of 95ha, which included:

- Residential Zone I – 1500 units

- Business Zone I – sixteen (16)
- Institutional Zone I – one (1);
- Institutional Zone II – three (3); and
- Open Space Zone II – sixteen (16)
- Open Space Zone III – one (1)
- Authority Zone I – one (1)

This alternative was considered a viable option as it provided a sufficient number of housing opportunities and accounted for sensitive areas (namely the identified grave yards and environmentally sensitive areas), however transport zoning (forming part of the associated infrastructure) was not included. Therefore, the this layout needed to be amendment (see Alternative 4 – preferred layout below).

4.4 ALTERNATIVE 4 (Preferred Layout)

Alternative 4 (**Appendix 2D – Preferred Layout**) was the final concept layout proposed and is the Applicant's Preferred Layout. This layout includes 1500 erven, over a 95ha extent:

According to the SPLUMA Application Report (**Appendix 4A**), the erven are broken down as follows:

- 1500 x Residential Zone I units: dwelling house/ residential house containing one residential unit - a self-contained interlinking group of rooms for the accommodation and housing of a single family, or a maximum of four persons;
- 11 x Business Zone I: business building / premises which will be used as shops and/or offices (e.g. professional offices, places of assembly, doctors consulting rooms);
- 4 x Institutional Zone II: place of worship (e.g. places for practising religion);
- 14 x Open Space II: public open space to be utilized by the public as an open space, park, garden, playground, or recreational site;
- 1 x Transport Zone I: public street reserved for street purposes and includes facilities for public transport;
- 1 x Authority Zone I: land/ erven and buildings utilized by local and district municipality to carry out mandatory functions.

Alternative 4 is similar to Alternative 3, and was developed with amendments to Alternative 1 and Alternative 2 due to new information from the specialists and municipal infrastructure departments in relation to existing services infrastructure that had a considerable impact on the layout and requirements for additional land uses/ changes to proposed land uses by the local municipality and specific spacing of these land uses. This alternative is also considered as a viable option and is also the municipality's preferred layout since it provides sufficient erven and housing opportunities (high and lower density), as well as providing for Municipal and Government land use opportunities, more Open Space and sufficient buffer zones recommended by the Botanical, Heritage, and Freshwater specialists.

4.1 OTHER ALTERNATIVES

Site Alternatives

The proposed site is the only viable site available and is in line with surrounding land use (namely the existing Groblersshoop Settlement located adjacent to the proposed site for development). Housing is a

constant need in the municipality, with other sites possibly earmarked for residential development that will not form part of this application. The construction of the proposed housing development in another location would increase the construction footprint and therefore, the impact on the environment.

Activity Alternatives

Activity alternatives are also limited with no feasible alternatives besides residential development to assess. Due to the need for housing in the !Kheis Local Municipality, the housing development and associated infrastructure on the property is therefore the only activity considered.

.

4.2 NO-GO ALTERNATIVE

This is the option of not developing the proposed housing development.

Although the no-go development might result in no potential negative environmental impacts, the direct and indirect socio-economic benefits (such as housing shortages as well as loss of potential employment and skills-development opportunities) of not constructing the residential development will not be realised. The need for additional housing opportunities in the !Kheis Local Municipality will not be realised. As described in *Section 2.1*, the population in Groblershoop is predicted to increase. As per the Engineer's Service Report, the state of the water and sewerage services associated with the Groblershoop Settlement does not have the capacity to service the current population within the development. The lack of adequate housing and employment opportunities may result in community members leaving the area and moving to Groblershoop, increasing pressure on an already financially- and services-constrained town. Due to the failing wastewater treatment works (WWTW), the no-go option will also result in continual pollution and health risks, coupled with huge maintenance costs. In addition, the WWTW requires extensive maintenance and investment to meet current demand. The predicted population will result in the need for the WWTW to operate effectively and at full capacity.

5. SITE DESCRIPTION

5.1 LOCATION

The proposed site is located to the south-east of Groblershoop, to the west of the N10, in the !Kheis Local Municipality, Northern Cape. The proposed site is located adjacent to the N10 and approximately 85km south east of Upington. The site is located in Ward 3 of the !Kheis Local Municipality, ZF Mgcawu District Municipality.

The site is mostly vacant and undeveloped. However, a large part of the site has been used for illegal dumping of domestic and construction waste (Figure 6 from Botanical Impact Assessment – Appendix 6A). Sewerage is present (see Number 5 in Figure 6) within the proposed site for development, which negatively impacts human health and the environment. This sewerage spill may be from a potentially broken pipeline associated with the Wastewater Treatment Works. The remaining areas of disturbance (linked to numbers in Figure 6) include;

- (1) General disturbances associated with excavations and illegal dumping of general and hazardous waste (approximately 6ha in extent);
- (2) Old, oxidation ponds (approximately 1.2ha in extent);
- (3) Additional oxidation ponds (approximately 2.7ha in extent);
- (4) Site of illegal dumping – including rubble;
- (5) Presence of sewerage as described above;
- (6) Small, man-made dam.



Figure 6. Disturbed areas associated with the proposed site for development (outlined in yellow). Source: Botanical Impact Assessment (Appendix 6A).



Figure 7. Raw sewage is overflowing from the trench onto the open ground within the proposed site for development – refer to Figure 6 above. This flow is clearly visible from the Google Earth image

Table 1. Coordinates of corner points of the Groblersshoop study area

Coordinates of corner points of study area	Point	Latitude (S) (DDMMSS)			Longitude (E) (DDMMSS)		
	1	28°	54'	5.75"	21°	59'	39.43"
	2	28°	54'	14.90"	21°	59'	50.83"
	3	28°	54'	20.19"	21°	59'	53.62"
	4	28°	55'	11.52"	22°	0'	4.86"
	5	28°	55'	9.52"	21°	59'	53.12"
	6	28°	54'	55.72"	21°	59'	47.21"
	7	28°	54'	44.08"	21°	59'	36.39"
	8	28°	54'	38.30"	21°	59'	36.87"
	9	28°	54'	31.40"	21°	59'	34.42"
	10	28°	54'	25.58"	21°	59'	28.25"

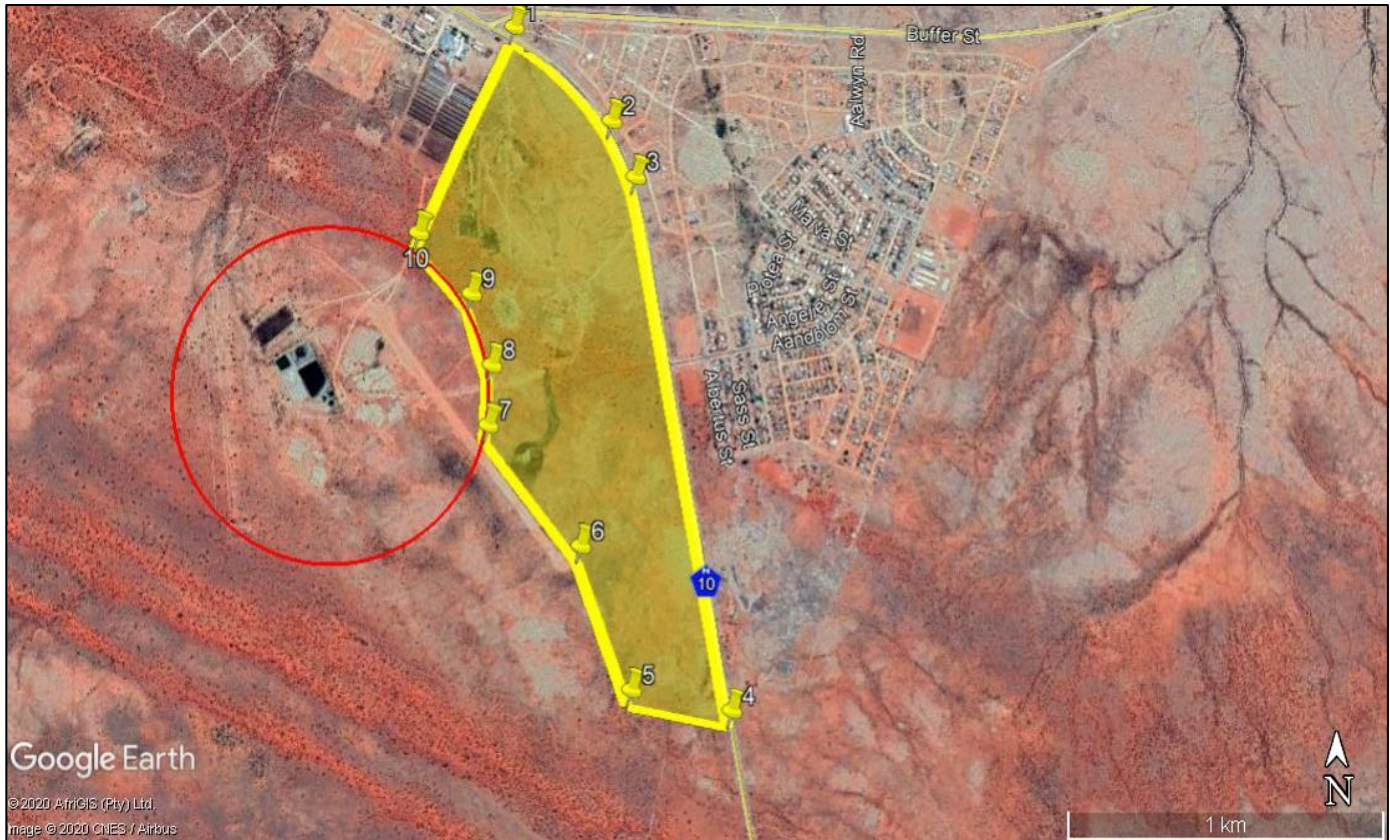


Figure 8. Map referring to GPS co-ordinates in table above. .



Figure 9. Taken from point 1, looking west over the site. Notice extensive dumping on the site.



Figure 10. Taken from point 2. The extensive dumping on this part of the site is clearly visible.



Figure 11. Overview of vegetation present on site looking over the western section of the proposed site.



Figure 12. Vegetation and informal housing, previously established, looking in a north-western direction.



Figure 13. Overview of site looking east over the site.



Figure 14. Taken from point 4, looking west. The raw sewage flowing in an open trench is visible in this image.



Figure 15. Taken from point 5, where the raw sewage is overflowing from the trench onto the open ground. This flow is clearly visible from the Google Earth image

5.2 VEGETATION

The proposed development footprint is located within the Bushmanland Arid Grassland (Figure 15), classified as *Least Threatened (LT)* as per the National list of ecosystems that are threatened and in need of protection (GN. 1002 of 9 Dec. 2011).

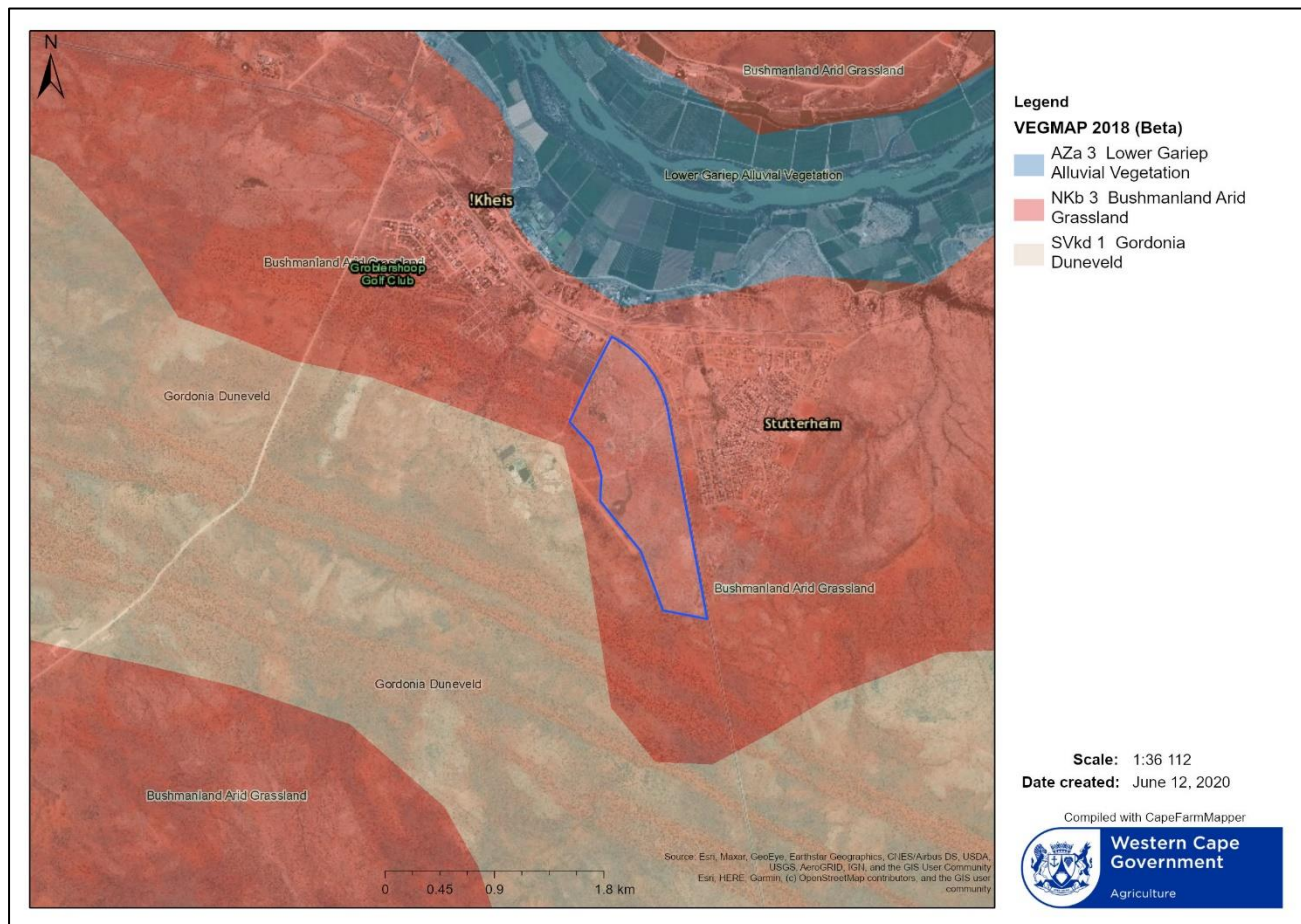


Figure 16: Proposed Groblershoop Site located in the Bushmanland Arid Grassland, a Least Threatened ecosystem type.

As per the Botanical Assessment (Appendix 6A), the proposed development footprint is about 95 ha in size. The site includes various areas already degraded or disturbed, this include a number of illegal dumping sites, an area which seems to contain old sewerage ponds and an area where sewerage is running through the veld from a potentially broken pipeline (Figure 6).

The northern and north-eastern corner of the site (nearest to Groblershoop) was mostly covered by a low white grass dominated sparse shrubland typical of the variation of Bushmanland Arid Grassland vegetation found on shallow soils dominated by calcrete (calcrete outcrops was often observed throughout the site). Although the Northern Cape are in the midst of a severe drought (the last 5 – 7 years), the effect of recent rains can be seen in the display of grasses and even the shrub layer encountered. However, the rain was apparently not yet enough to trigger a display of annual herbaceous species. Bulb species were also rarely observed.

Vegetation encountered on site varied from an open grassland dominated by white grasses to a sparse low (<0.5 m) shrubland dominated by the white stemmed *Justicia australis* (=Monechma) in combination with *Tetraena decumbens*, *Salsola zeyheri*, *Tetraena microcarpa*. Dense stands of *Aloe claviflora* were often encountered, in fact they are so common that the local people use them to demarcate erven.

The following plants were also observed scattered throughout the small ("verneuk halfmensie") *Acanthopsis disperma*, the common *Aptosimum spinescens*, *Barleria lichtensteiniana*, *Boscia albitrunca*, patches of *Cynanchum viminalis*, the nine-awned grass *Enneapogon cenchroides*, *Euphorbia gariepina*, and occasionally the smaller *Euphorbia spinea*, *Geigeria ornativa*, *Justicia incana*, *Kleinia longiflora*, *Lacomucinaea lineata* (= *Thesium lineatum*), *Leucosphaera bainesii*, *Lycium cinereum*, *Rhigozum trichotomum*, *Senegalia mellifera* (occasionally) and the creeping *Trianthema parvifolia*. In the disturbed northern corner of the site, the vegetation was often dominated by dense stands of the alien *Prosopis* tree.

The remainder of the property was characterised by red sandy soils that varied in depth, but also showed outcrops of calcrete scattered throughout. At the higher lying western boundary of the even quartzite was exposed in small patches. The vegetation varied depending on the depth of the sand, Deeper sandy soils was characterized by denser and larger stands of small trees like *Senegalia mellifera* and larger shrubs like *Phaeoptilum spinosum*, *Lycium cinereum* and *Rhigozum trichotomum*. By far the largest portion of the site was covered by varying depths of red sandy soils covered by a transitional form of vegetation between duneveld and arid grassland. The plant species seems to overlap between the two vegetation types (depending on the soil depth and occurrence of calcrete) and many of the species encountered on the shallow rocky soils, where also encountered on the deeper sandy soils, but the structural composition were very different with the plants normally denser and larger the deeper the sands.

Plant species encountered included the following: The small *Acanthopsis hoffmannseggiana*, *Aizoon burchellii*, *Aloe claviflora*, *Aptosimum spinescens*, *Asparagus cf. capensis*, *Asparagus species*, *Boscia albitrunca*, patches of *Cynanchum viminalis*, *Euphorbia gariepina*, *Euphorbia braunsii*, *Euphorbia spinea*, *Galenia africana*, *Geigeria ornativa*, *Justicia incana*, *Kleinia longiflora*, *Lacomucinaea lineata* (= *Thesium lineatum*), *Leucosphaera bainesii*, *Lycium cinereum*, the climbing balsam pear, *Momordica balsamina*, *Phaeoptilum spinosum*, the common *Rhigozum trichotomum*, *Rogeria longiflora*, the spiny *Ruschia divaricata*, *Salsola kali*, *Salsola zeyheri*, *Senegalia mellifera*, *Tapinanthus oleifolius* and *Ziziphus mucronata*. **The most significant feature encountered were a number of beautiful and well protected Sheppard trees (*Boscia albitrunca*) scattered throughout the site.**

According to the Northern Cape CBA map, the proposed development will overlap both a terrestrial CBA. However, it must be noted that large portions of the proposed site is already disturbed, and that there is no real alternative site within the Municipal town boundaries that is not located within the CBA. The proposed development will not impact on any recognised centre of endemism (Van Wyk & Smith, 2001).

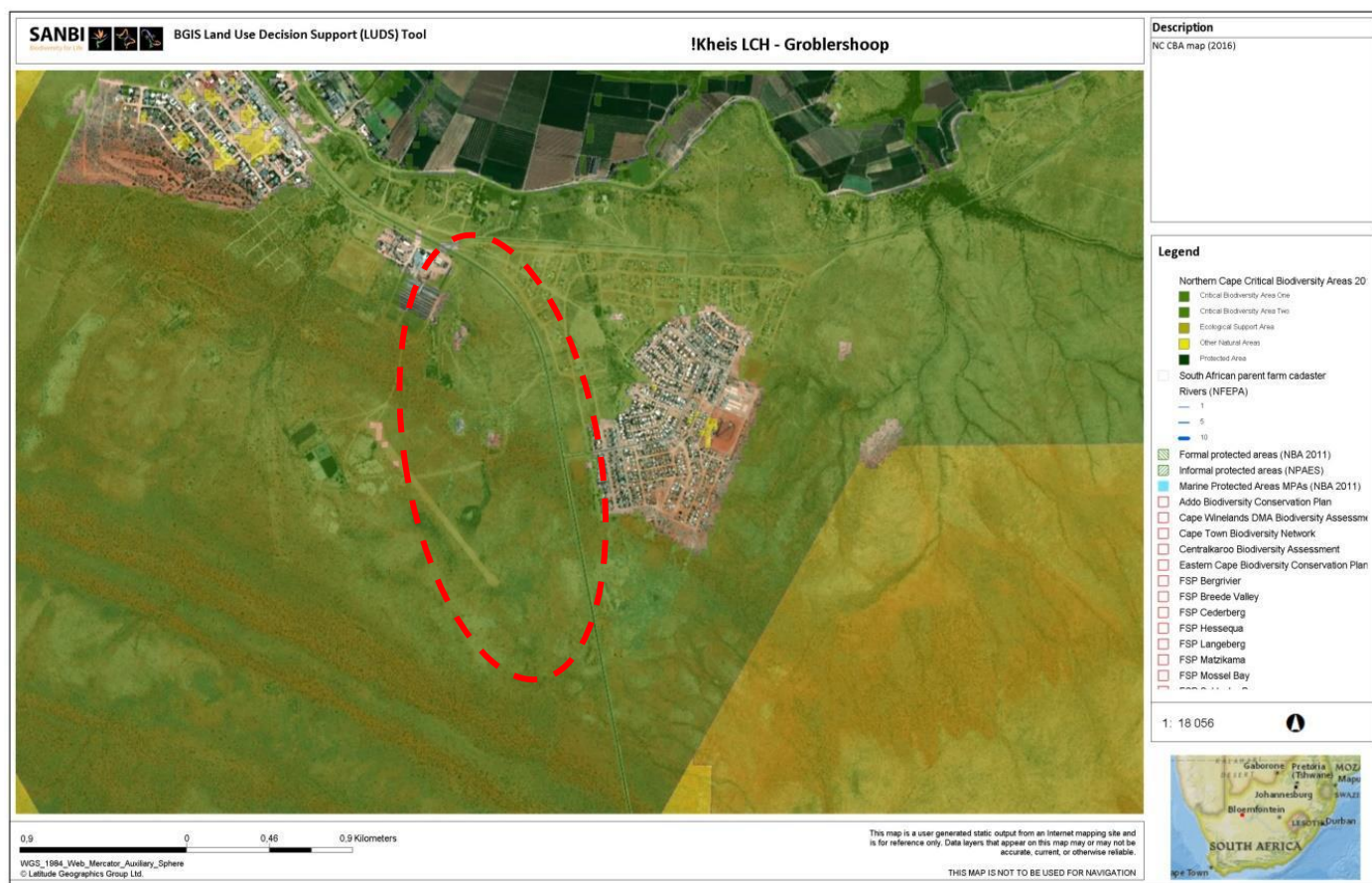


Figure 17. Critical Biodiversity Area (CBA) associated with the Groblershoop study area (outlined in red).

According to the Botanical Specialist, the proposed development is likely to result in a Medium-Low impact, which can be reduced to a Low impact with good environmental control during construction. With the correct mitigation it is unlikely that the development will contribute significantly to any of the following:

- 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.

The botanical specialist concluded that, *“with the available information it is recommended that the project be approved, with the proposed mitigation actions”*.

5.3 FRESHWATER

According to the Freshwater Assessment (**Appendix 6C**), the only aquatic feature which occur within the northern corner study area. The drainage line is approximately 700m long and ends against the vineyards along the Orange River. Much of its existence probably depends on runoff from the N10 trunk road. a prominent tree line on the site that resembles that of a drainage line. This is entirely artificial, as it is the result of raw sewage being dumped from tanker trucks on the site and on its flow path down the incline has created the conditions for the trees to establish themselves. This tree line starts as abruptly as it ends and is not connected to any other drainage line. The urban solid waste and building rubble can be construed as a threat to the aquatic environment, should it end up in the drainage lines, irrigation canals and in the Orange River. There is a drainage line with its tree line further south, alongside the red dunes. This drainage line is outside the area earmarked for development, but is of concern because it is possible, perhaps not unthinkable, given the current circumstances, that rubble and sewage from the urban area can end up there in the future. The Freshwater Specialist classified the drainage line, present within the site footprint, as having a small economic footprint. If this drainage line is lost because of development, it will not represent a mentionable loss in environmental goods and services. Urban wastewater is of importance because untreated waste ends up in water ways, raw sewage is dumped in drainage lines. Likewise, several sewage pump stations are dysfunctional, overflowing, with large quantities of raw sewage flowing down drainage lines. Household solid waste is not collected and removed according to standard municipal operating procedures. Large quantities of waste accumulate in the townships and the streets. Large quantities of waste end up in the drainage lines as well. The driver of the drainage lines is the occasional flood that follows sudden and intense rainfall events. This is followed by prolonged droughts and intense summer heat that prevents the development of any viable aquatic habitat. This is apart from shallow ground water that explains the growth of a somewhat more prolific vegetation along the drainage lines. The current sewage and solid waste situation are threats to the WULA. The authorities may insist that these issues be resolved before a General Authorization is approved. Apart from this, the findings of this Fresh Water Report indicate that a general Authorization would be in order for the development of an urban housing scheme at Groblershoop.

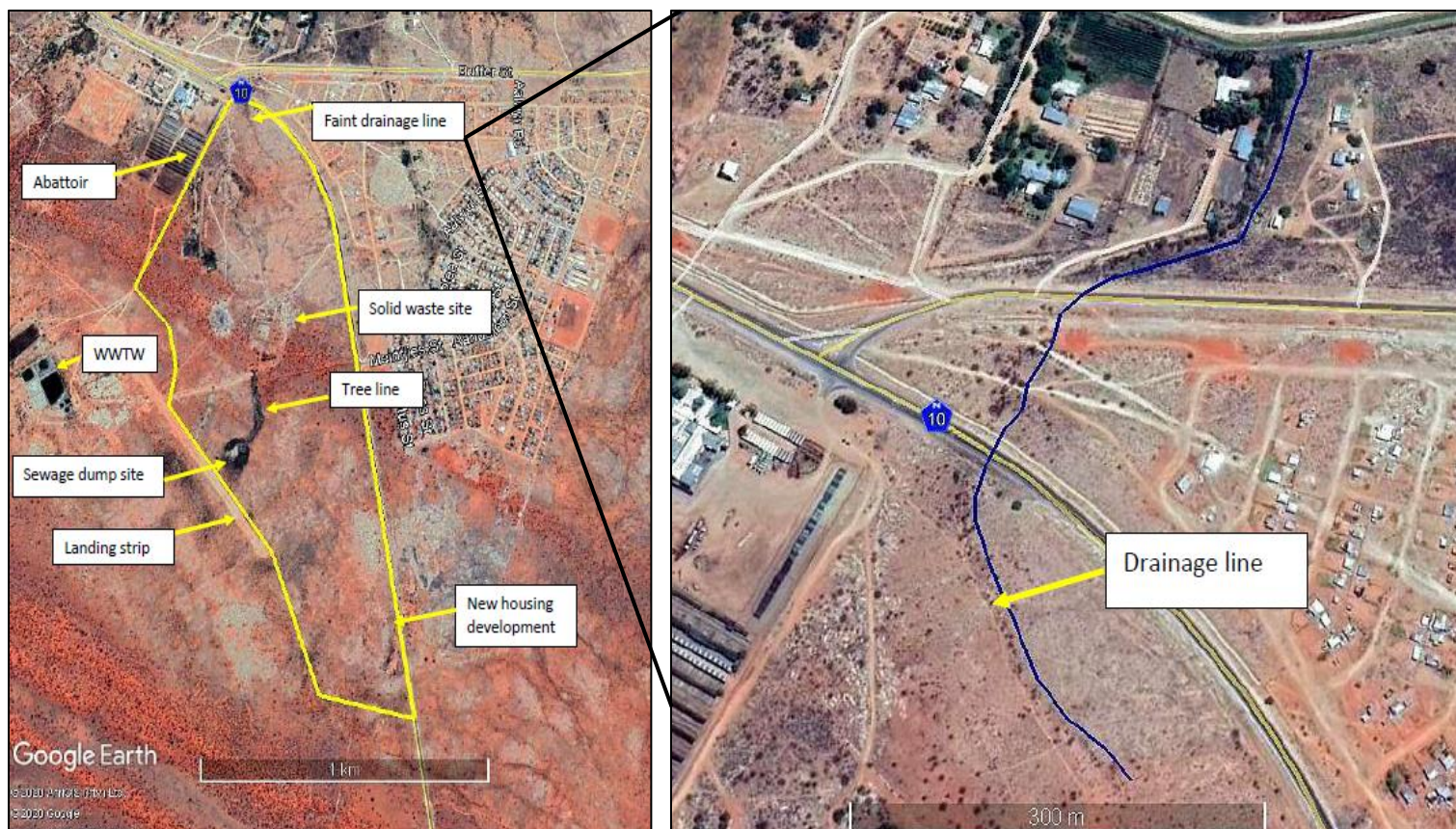


Figure 18. Freshwater areas associated with the proposed site for development.

5.4 GEOLOGY

The proposed Groblershoop site earmarked for development is located within the Groblershoop Formation and Kalahari Group (Figure 18). The site for the proposed development is located between the lithology of the Kaapvaal Craton and Namaqua-Natal mobile belt where the remaining, original geology is comprised of Kaaiken Terrane whereas the site is located on the Groblershoop Formation of the Brulpan Group. The bedrock associated with the site comprises of quartz-sericite schist and quartzite.

Soil Profile:

The soil profile of the site is comprised of river terrace gravels (horizon varies between 100-800mm), alluvium (horizon extends to maximum depth of 800mm), calcrete of the Mokalanen Formation, Kalahari Group (extending to depths of 100 – 900mm where refusal of excavation occurred), residual quartzite (extended depth of 300mm) and fill (stockpiled material, where surface rubble were distributed widely over the site).

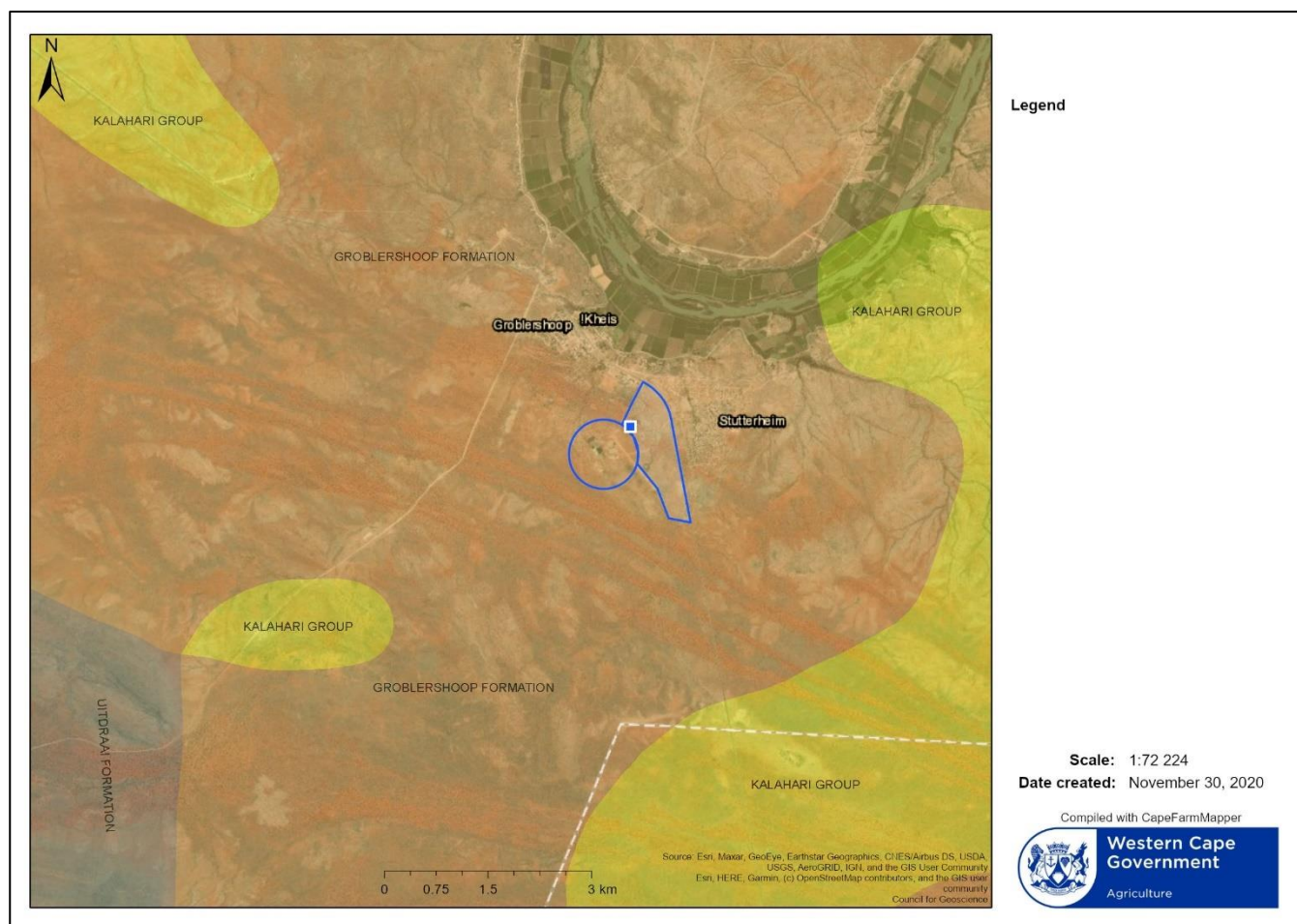


Figure 19. Geological features associated with the Groblershoop site.

5.5 GEOHYDROLOGY

According to the Geo-technical Assessment (**Appendix 6D**), 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%.

5.6 CLIMATE

Rainfall largely in late summer/early autumn (major peak) and very variable from year to year. MAP ranges from about 70 mm in the west to 200 mm in the east. Mean maximum and minimum monthly temperatures for Kenhardt are 40.6°C and –3.7°C for January and July respectively. Corresponding values for Pofadder are 38.3°C and –0.6°C. Frost incidence ranges from around 10 frost days per year in the northwest to about 35 days in the east. Whirl winds (dust devils) are common on hot summer days³.

³ Mucina and Rutherford, (2006). The Vegetation of South Africa, Lesotho and Swaziland, *Strelitzia* 19

5.7 SOCIO-ECONOMIC CONTEXT

!Kheis Local Municipality

According to the !Kheis Municipality Integrated Development Plan (IDP 2019 – 2022), !Kheis municipality the population of Kheis increased by 1 520 people, from 15 046 people in 1996 to 16 566 people in 2016.

The total number of households in Kheis municipality increased over the period from 1996 to 2016, from 3 206 households to 4 344 households respectively. It shows an increase in the number of two-person households, from 565 households in 1996 to 823 households in 2016. There is a reduction in the number of households with 10 persons and above. two-person households increased from 17.6% in 1996 to 18.9% in 2016, this is followed by three-person households at 17.8% of the total number of households in Kheis.

There was an improvement in the level of education in Kheis over the period 1996 to 2016, where there was a decline in the percentage of people aged 20 years and above with no schooling from 26.8% in 1996 to 11.7% in 2016. There is also an increase observed in the percentage of people having a matric qualification over the period from 1996 to 2016 from 6.6% to 18.0.

According to the !Kheis Municipality IDP (2019 – 2022), 20.8% of the households in Kheis reported a lack of safe and reliable water supply as being the major difficulty facing the municipality, with 11.2% reporting that inadequate housing is a problem in the municipality. Approximately 9.8% was reported inadequate sanitation/sewerage/toilet services. There was a decrease in the proportion of households staying in formal dwellings in Kheis. Households occupying formal dwellings decreased by 15.7% from 75.0% in 1996 to 59.3 in 2016. An increase is observed in the proportion of informal dwellings, from 13.4% in 1996 to 16.5% in 2016. The proportion of traditional dwellings shows an increase over this period.

There was an increase of 8.7% in the proportion of dwellings owned by households in Kheis, from 38.3% in 2001 to 47.0% in 2016. There is a decline in the proportion of households that are occupied rent-free, from 49.6% in 2001 to 7.5% in 2016. There was an increase in the proportion of households in Kheis whose refuse is removed by a local authority at least once a week, from 48.1% in 1996 to 62.0% in 2016. There was an increase in the proportion of households that have no rubbish disposal from 1.6% in 1996 to 7.6% in 2016.

According to the !Kheis Municipality IDP (2019 – 2022), there was a decrease in the proportion of households that use a flush or chemical toilet in Kheis, from 45.3% in 1996 to 45.1% in 2016. There is an increase in the proportion of households using a pit latrine toilet, and a significant decrease in the proportion of households that use a bucket latrine, from 8.1% in 1996 to 1.8% in 2016.

According to the !Kheis Municipality IDP (2019 – 2022), the employment rate in !Kheis municipal area has dramatically increase from 50% to 60% high from 1996 – 2001 and took a dip from 60% - 59% from 2002 - 2014 and that the unemployment rate has also increase in 1996 – 2003 from 18% - 21%, but remained constant at 21% from 2004 – 2007 and took a massive increase from 2008 – 2014 from 21% – 32% due to exporting in the agriculture industry.

According to the !Kheis Municipality IDP (2019 – 2022), the reason why the unemployment rate is above 20% in the !Kheis area is caused by the fact that only a very small percentage of people are highly skilled and are currently attending any tertiary education at higher institutions and the seasonal economic activities

taking place in the agriculture sector which has a direct impact on the skills development levels and employment rate in the area.

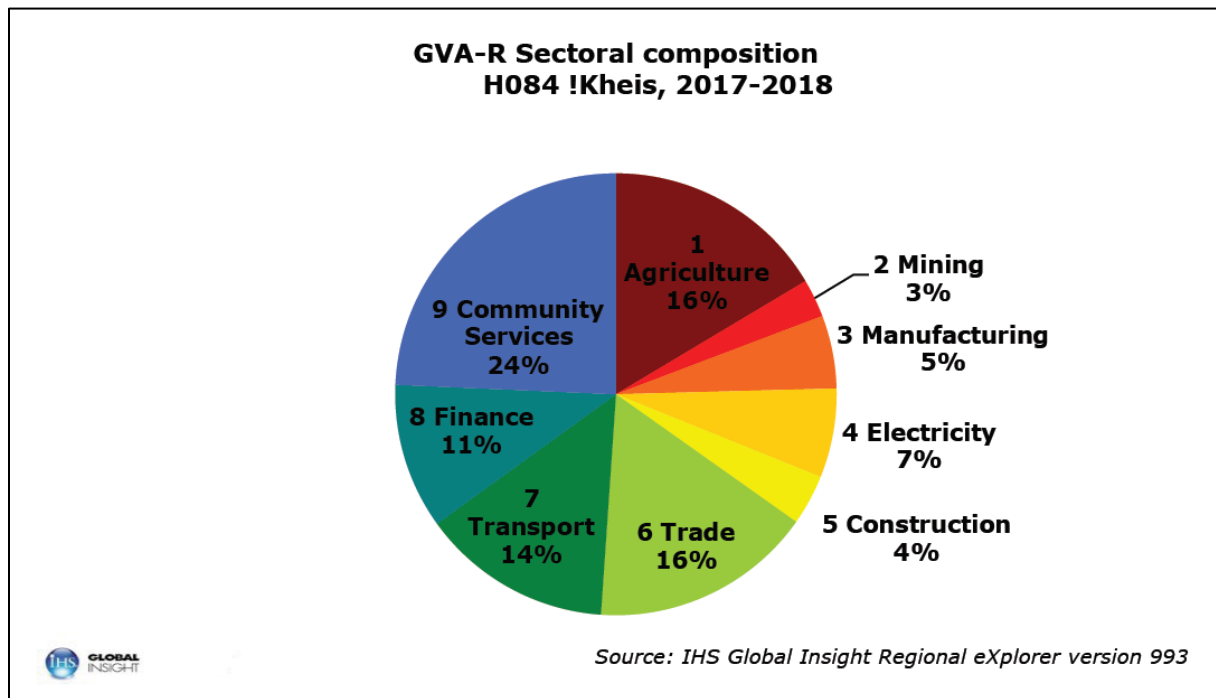


Figure 20: Sectoral composition !Kheis (2017-2018)(Source !Kheis Municipality IDP (2019 – 2022))

As per figure 20 above, the highest contributing sector was community services with 24% to the total economy and agriculture being the second highest contributing sector with 16% and the lowest two contributing sectors to the total economy in the area are mining at 3% and construction at 4% in 2015. A large number of residents are dependent on government pensions, implying that a large part of the residents of !Kheis earn less than R 2000-00 per month and that in itself has a negative influence on the payment of services. Livestock is marketed at Groblershoop, Upington, Johannesburg and Cape Town. Cotton, corn, wheat, tomatoes, peanuts, musk melons and pumpkins are cultivated under irrigation from the Orange River. In the irrigation sector, focus is mainly placed on the cultivation of table grapes.

Groblershoop

Refer to Section 2.1.

The Groblershoop community requires formalized, state-instituted housing and associated infrastructure. The proposed development will distribute the density of the population, improve community member's standard of living, as well as access to essential services including roads, electricity, water supply, appropriate sewage disposal infrastructure, and environmental health in the area. Therefore, the proposed development will enable adequate housing to be constructed, thereby promoting access to basic service delivery as well as socioeconomic development in Groblershoop and its surroundings. The proposed Groblershoop Housing development is in line with the !Kheis IDPs key strategic and development objectives, namely to improve and maintain basic service delivery through specific infrastructural projects including human settlements and basic services, in the poverty-stricken Groblershoop Township. As of 2011, the demographic profile of the KLM includes the total population of 16 637 individuals with a total

number of 4 145 households. According to the SDF, Groblershoop comprised of approximately 4 938 members, making up 29.7% of the !Kheis Local Municipality (in 2011). Groblershoop also has the largest unemployment percentage within the Local Municipality. Therefore, this community requires formalized, state-instituted housing, and associated, infrastructure. The proposed development will distribute the density of the population, improve community member's standard of living, as well as access to essential services including roads, electricity, water supply, appropriate sewage disposal infrastructure, and environmental health in the area. Therefore, the proposed development will enable adequate housing to be constructed, thereby promoting access to basic service delivery as well as socioeconomic development in the Groblershoop Township and its surroundings. !Kheis Local Municipality is committed to the vision of the National Government of which it committed itself towards accelerating shared growth to halve poverty and unemployment and promote social inclusions. Housing is one of the social inclusions in this vision.

The Green Drop Program (DWS incentive regulation) promoting the effective and efficient management of waste water. As per the Green Drop Report (2010/11), the 71 treatment facilities within the Northern Province receive approximately 93mL/day. Although the total collective hydraulic design capacity of these treatment facilities are 150ML/day, the remaining 38.5% surplus capacity may not be readily available due to inadequate maintenance and operational deficiencies at lower capacity municipalities. The current state of the Groblershoop WWTW may not be amenable to service an increased amount of sewage generated by the expected number of community members who will be benefiting from the construction of the new housing. !Kheis Local Municipality received a Green Drop Score Percentage of 8%, meaning the WWTWs in the Municipality are underperforming and pose a threat to the environment and public health.

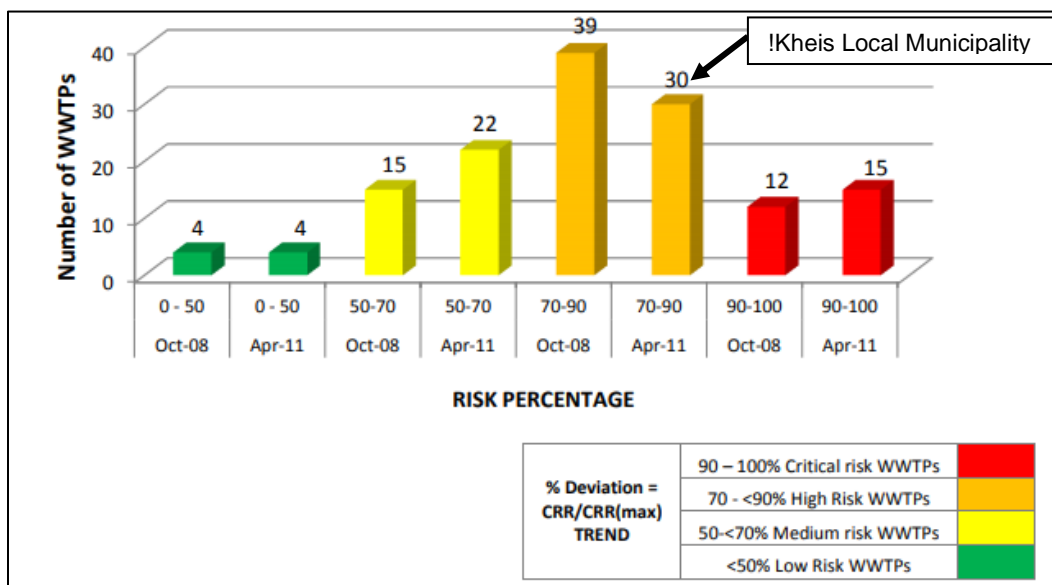


Figure 21. Results of Green Drop Score (2010/11)

The anticipated socio-economic values associated with the proposed project, as provided by the municipality, can be seen in Table 1 below. The development is expected to create approximately 100 employment opportunities, with approximately 85% of that going to previously disadvantaged individuals.

Table 2. Social and Economic Aspect

Anticipated CAPEX value of the project on completion	TBC
What is the expected annual income to be generated by or as a result of the project?	TBC
New skilled employment opportunities created in the construction phase of the project	Construction phase of the project yet to commence. However, it is expected that new skilled employment opportunities will be created for local community during physical construction of infrastructure
New skilled employment opportunities created in the operational phase of the project	None
New un-skilled employment opportunities created in the construction phase of the project	Estimated ± 100 employment opportunities
New un-skilled employment opportunities created in the operational phase of the project	None
What is the expected value of the employment opportunities during the operational and construction phase?	\pm R3 500.00 per employee per month
What percentage of this value that will accrue to previously disadvantaged individuals?	$\pm 85\%$
The expected current value of the employment opportunities during the first 10 years	Unknown at this stage
What percentage of this value that will accrue to previously disadvantaged individuals?	To be confirmed

Although no direct operational job opportunities are expected, indirect job opportunities may be provided with the provision of business zoned properties.

5.8 HERITAGE FEATURES

According to the Heritage Impact Assessment (HIA), ten incidences of ESA/ MSA/ LSA lithic material were recorded across the development footprint. The lithic assemblage predominantly consists of informal tools and knapping debris, with some scrapers, blades, retouched flakes and cores. The majority of the lithics are Banded Ironstone Formation (BIF), an abundant raw material within the area, with some cryptocrystalline silicates (CCS) and quartzite pieces. The material was documented as widely dispersed surface scatters, with no archaeological context. The resources will be affected negatively by the proposed development, but due to the low significance of the material, the impact is negligible.

The Groblershoop development footprint is underlain by Quaternary to Recent aeolian sediments of the Gordonia Formation (Kalahari Group) as well as underlying Precambrian rocks of the Transvaal Supergroup. According to the SAHRIS PalaeoMap, the Palaeontological Sensitivity of the Kalahari Group

is low. The underlying Precambrian Transvaal Supergroup that is of moderate significance are too deep to affect the proposed development (Butler 2020). According to the SAHRIS PalaeoMap, the Palaeontological Sensitivity of the Kalahari Group is low. The underlying Precambrian Transvaal Supergroup that is of moderate significance are too deep to affect the proposed development (Butler, 2020). Based on the assessment of the potential impact of the development on the identified heritage, the following recommendations are made, taking into consideration any existing or potential sustainable social and economic benefits:

1. No significant heritage sites or features were identified within the surveyed sections of the new Groblershoop township, Portion 16 of the Farm Boegoebergnedersetting RE/48. The Early/Middle/Late Stone Age cultural material identified is not conservation worthy. No further mitigation is recommended with regards to these resources. Therefore, from a heritage point of view, we recommend that the proposed development can continue.
2. A graveyard dating from the 1950s-70s is located within the development footprint. The graveyard's presence was overlooked during the initial pedestrian survey of the area, due to being partially covered by building rubble, discarded rubbish and grass and shrubs. The graveyard is in a poor state of preservation with toppled headstones, and scattered cairns. The graveyard is situated within the development footprint but in an area not earmarked for erven division. Mitigation to negate the negative impact of the development is recommended. The neglected graveyard situated within the development footprint is in a terrible state of preservation. An attempt should be made to clear the area of the building rubble and rubbish, as well as restore the graves. It is recommended that the graves be fenced off with the inclusion of a 50 m buffer/safety zone. This site is graded as IIIB and is of High Local Significance (Figures 22 - 24).
3. The Groblershoop cemetery is situated well outside the development footprint. This site is graded as IIIB and is of High Local Significance. No further mitigation is recommended with regards to these resources.
4. Due to the low palaeontological significance of the area, no further palaeontological heritage studies, ground-truthing and/or specialist mitigation are required. It is considered that the development of the proposed development is deemed appropriate and feasible and will not lead to detrimental impacts on the palaeontological resources of the area (Butler 2020).



Figure 22. Neglected graveyards present within the proposed site for development. Source: Mr. Jan Engelbrecht (Heritage Specialist)



Figure 23. Additional image of neglected graveyards present within the proposed site for development. Source: Mr. Jan Engelbrecht (Heritage Specialist)



Figure 24. Additional image of neglected graveyards amongst general and hazardous waste illegally dumped within the proposed site for development. Source: Mr. Jan Engelbrecht (Heritage Specialist)

6. SERVICES

Due to the nature and size of the proposed development, an investigation into the status and availability of existing bulk services to supply the development was needed. Bvi Consulting Engineers compiled a Bulk Services Report (**Appendix 4B**), investigating the status of existing services that were identified to potentially supply the proposed area on the external services for the proposed development.

A brief description of the bulk services is given below. Please refer to the Engineer's Services Report (Appendix 4B) for more information.

6.1 WATER

According to the Engineering Services Investigation Report (prepared by Bvi Engineers, dated August 2020), water supply and associated infrastructure currently servicing the existing Groblershoop Settlement (Figure 25) comprises of:

- A raw water river pump station delivering 6l/s;
- A 1,660m long, 160mm diameter PVC Class 6 raw water supply line between the river and the water purification works on the side of the village
- The water treatment works consisting of:
 - An open raw water storage dam
 - Raw water pump station
 - A package type water treatment plant (1200 m³/day),
 - An RC Concrete Clearwater storage tank
 - A Clearwater Pump station to:
 - 1.2ML RC Storage Reservoirs (Old Town)
 - 0.8ML Sternham Sectional steel reservoir (incl. High lift Pump station & Elevated Tank)
 - 55kL Wit Blok & Abattoir Elevated Tank

As per the Engineer's investigation, various components of the water supply system are currently manually operated (including the river pump, the water treatment works, and the reservoir levels). The Strenham elevated tank is not functional, and water is distributed to the village from the sectional steel reservoir that stores potable water (Figure 25). Most of the existing pumps and motors are outdated, along with water meters and pressure gauges that are out of service.

Calculated Annual Average Daily Demand (AADD) is 1127m³/day whereas the proposed demand was calculated at 3 496m³/day. The existing Water Treatment Plant is under capacity with 1 700m³/day. The river abstraction pump line requires an upgrade from 160mm dia. uPVC to 250mm dia. uPVC rising main, including new proposed river raft pump station. The biggest problems are with bulk and elevated storage, along with the insufficient small capacity 150m³ clear water sump. The existing potable water pump station requires refurbishment and replacement of existing old potable water pumps and motors for the Sternham and Abattoir/Wit Blok elevated storage tanks supply. The above indicates additional WTW plant requirement of 1552 m³/day for the planned new 1500 erven, in addition to the existing daily requirement of 1944 m³/day for a total future 3496m³/day daily summer peak WTW Plant requirement.



Figure 25. Current bulk water supply and water reticulation. Source: Engineer's Service Report (Appendix 4B).

As per the Engineer's Services Report, the upgrades recommended by the Engineer to service the proposed Groblershoop bulk water infrastructure includes (Figure 26);

- New river pump station to a raft with a duty and standby pump that supply 70l/s.
- An additional/new 300mm diameter Class 6 PVC pipeline between the river pump station and the existing potable water storage reservoir.
- Upgraded WTW Plant to 3496m³/d daily summer peak capable of delivering 146m³/h on the existing treatment works site.
- Upgrade exiting old potable water storage concrete reservoir with floating roof cover for additional 1830m³ clear water storage next to the upgraded water treatment works.
- A new 1800m³ sectional steel storage reservoir next to the existing potable water pump station.
- A new 78l/s uplifting pump station at the treatment works.
- A new 315mm pipeline 3,500m long at 78L/s to new sectional steel pressure tower.
- A new 750m³ sectional steel pressure tower on highest point of planned 1500 development.
- A new 250mm pipeline through the planned 1500 development to create a new ring network.
- Refurbish existing raw water and potable water pumps & motors.



Figure 26. Recommended upgrades to the existing water services for the proposed development of the Groblershoop Housing Project. Source: Engineer's Service Report (Appendix 4B).

Due to the nature of the proposed development, namely a new housing development (categorized as "Low Risk – Group 4"), no specific provision for firefighting water is required in water storage, or reticulation mains in these areas. Hydrants should, however, be located at convenient points in the area on all mains of 75 mm nominal internal diameter and larger, and in the vicinity of all schools, commercial areas and public buildings.

6.2 SEWER

The services report investigated the current bulk services capacity, determined the needed upgrades to accommodate the proposed expansion project and sought solutions to obtain the required funding to implement the necessary upgrades to the bulk services infrastructure.

According to the Engineering Services Investigation Report (prepared by Bvi Engineers, dated August 2020), Houses in the Groblershoop village is currently serviced by conservancy tanks or VIP toilets. There are presently no waterborne sewer systems, except for recently implemented Wit Blok sewer pump station and riser main. The conservancy tanks are currently emptied by a honey sucker truck and spilt in an oxidation pond system to the west of the existing Groblershoop Settlement. The existing Wastewater Treatment Works (WWTW) Oxidation Ponds system with 650m³/day current capacity is adequate to service the sewage load of the existing Groblershoop Settlement. Total sewer flow per day was calculated at 889 600l/day.

As per the Engineer's Service Report, if a full borne sewer sewerage system is required for the new 1500 houses development, the associated bulk infrastructure will consist of two pump stations, rising main pipelines and upgraded WWTW oxidation ponds.

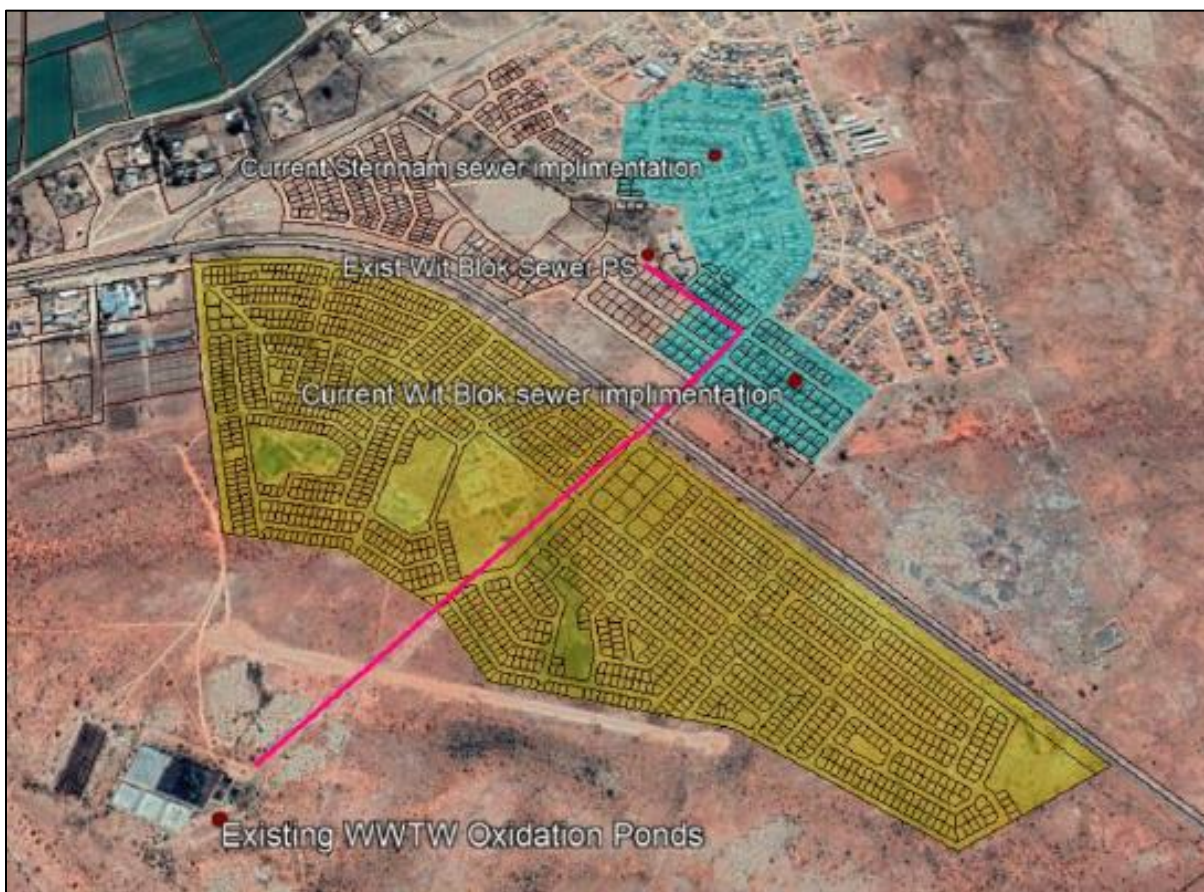


Figure 27. Existing sewage infrastructure servicing the existing Groblershoop Settlement. Source: Engineer's Service Report (Appendix 4B).

Recommended bulk sewer infrastructure upgrades (Figure 28) include;

- Construction of two new sewer pump stations capable of delivering 73 L/s direct to the Waste Water Treatment Plant;
- New 250mm diameter and 200mm diameter Class 6 PVC pipelines (750m & 1200m) between the pump stations and a upgraded Waste Water Treatment Plant (oxidation ponds); and
- Upgrading of the Waste Water Treatment Plant (oxidation ponds) to a capacity of 1.1ML per day.

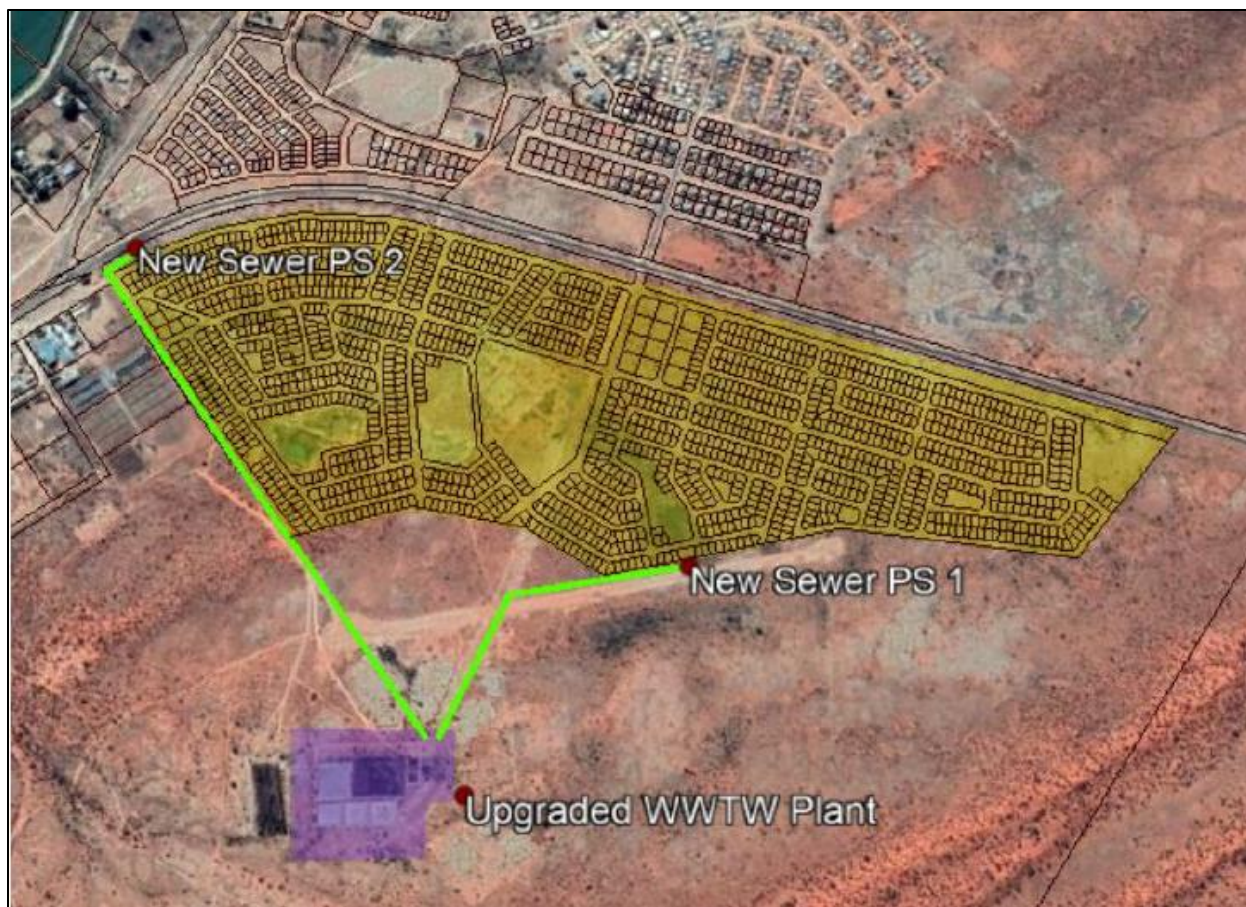


Figure 28. Proposed sewage infrastructure upgrade as recommended by the Engineer. Source: Engineer's Service Report (Appendix 4B).

6.3 ROADS

Existing access to site is along the N10 where roads off the N10 can be used to access the site. No problems are foreseen regarding roads and access and access to the development will be from the existing Residential Collector Streets (Class 4b).

6.4 STORMWATER

No formal stormwater infrastructure is present within the Groblershoop settlement where stormwater runoff drains from the centre of the site. According to the Engineering Services Investigation Report, existing roads will be adequate for this purpose. The guiding principle is that the peak stormwater runoff from the site, post construction, should not exceed the full range of storm return periods (1:2 to 1:50) of the site pre-construction. Stormwater infrastructure must be constructed to:

- Accommodate minor storm events (i.e. 1:5 years) in open channels or side drains of streets;
- Accommodate major storm events (i.e. 1:50 year) through controlled overland flows, aboveground attenuation storage, and berms at the higher end of the site; and
- Infrastructure must be constructed to prevent pooling of stormwater runoff.

In addition to parameters stipulated above, a Stormwater Management Plan (SWMP) must be designed and compiled to address concerns raised by the I&AP - namely the potential flow of sewage- and/or solid waste-contaminated stormwater runoff from the development into the drainage lines and subsequently the Orange River. Therefore, it is recommended that the proposed development be supported/ authorized subject to the compilation of a SWMP which includes required engineering parameters (Appendix 4B) and the management of potentially sewage- and/or solid waste-contaminated stormwater runoff.

6.5 SOLID WASTE (REFUSE) REMOVAL

According to the Integrated Development Plan, 2019 – 2022, the proportion of households in Kheis whose refuse is removed by a local authority at least once a week increased from 48.1% in 1996 to 62.0% in 2016. However, there was an increase in the proportion of households that have no rubbish disposal from 1.6% in 1996 to 7.6% in 2016. The IDP also states that in 2016, 21.1% of households dispose of waste via their own refuse dump. This is evident in the large amounts of domestic waste observed dumped on the site. As per the Engineering Services Investigation Report, a designated solid waste site will be upgraded to accommodate the additional 1500 erven.

6.6 ELECTRICITY

As per INEP Guidelines, the expected additional load of the proposed development will initially be 162KVA. The proposed site for development falls within the Eskom Distribution area and existing electrified households purchase electricity directly from Eskom and not via !Kheis Local Municipality. Currently, the bulk connection to the Groblershoop settlement is via a 22kV overhead line from the Eskom 10MVA Groblershoop substation – which is in the process of being upgraded to a 20MVA (to be commissioned in December 2020). The existing overhead feeder will only be able to accommodate the future additional 660kVA load once the Groblershoop 10MVA substation has been commissioned.

It must be noted that the internal electrical network extension can only be carried out by Eskom after formulation processes have been completed as the area falls under Eskom's jurisdiction.

7. PROCESS TO DATE

The section below outlines the various tasks undertaken to date, the members of the team involved in the project, as well as the Public Participation Process.

6.1 TASKS UNDERTAKEN TO DATE

Table 3. Tasks undertaken in the EIA to date and way forward

Date	Action	Responsible Party	Completed
17 th April 2020	Clarification meeting with client and appointment of environmental assessment practitioner (EAP) for EIA and environmental authorisation (EA) application	EnviroAfrica and Macroplan	
7 th May 2020	Appointment of specialists for EIR assessments: - Botanical Specialist (Mr Peet Botes) - Freshwater Specialist (Dr Dirk van Driel) - Archaeological Specialist (Mr Jan Engelbrecht)	Mr Peet Botes Dr Dirk van Driel Mr Jan Engelbrecht	
10-14 th May 2020	Draft Scoping Report compilation	EnviroAfrica	
19 th May 2020	EAP site visit	EnviroAfrica	
19 th May 2020	Public participation (PP): - Letter drops (Adjacent Landowner Notification); - Poster placement (Public notice board at the !Kheis Local Municipality, public notice board of AgriMark (Groblershoop), Municipal Offices in Boegoeberg, Aunt Dolletjies Municipal Library in Boegoeberg, different conspicuous locations along the boundary of the proposed site for development (with a lot of foot traffic), and three tuckshops/stores. - Advertisement publication (<i>published on 11th June 2020</i>) - Notified ward councillor. At time of conducting PP, comment period had to be a minimum of 60 days ⁴	EnviroAfrica	
18-22 nd May 2020	Specialist site visits	Botanical Assessment Mr Peet Botes	
18-22 nd May 2020		Freshwater Assessment Dr Dirk Van Driel	

⁴As per section 4 of the 'Directions Regarding Measures to Address, Prevent and Combat the Spread of COVID-19 Relating to National Environmental Management Permits and Licenses', published on the 5th June 2020 by the Department of Environment, Forestry and Fisheries (DEFF). These new directions state that any notice given after the 5th June 2020 requires an extended 30-day comment period in addition to the legislated 30-day comment period (total of 60-day comment period). If PP was conducted before the 27th March 2020, the formal comment period between 27th March and 5th June 2020 are null and void and therefore, restarted on the 6th June 2020. The initial comment period must be extended by additional 21 days (total of 51 day). Please note that we are still waiting for directives from DEFF on application timelines. These Directives published on the 5th June 2020 apply to Level 3 Lockdown Period and are subject to change. **Please note:** the dates above may be subject to change should the Department of Environmental Affairs, Forestry and Fisheries (DEFF) and the Department of Environment and Nature Conservation (DENC) issue any new directives and legislated timeframes. The final decision (No. 18) may be expedited on request by the applicant.

18-31 st May 2020		Archaeological Assessment	Mr Jan Engelbrecht	
14 th August 2020	Advert comment period ends (<i>60-day comment period as per new directions</i>)			
Application and Scoping Phase				
29/07/2020	Submitted Application Form and Draft Scoping Report (incl. the Plan of Study for EIA) for 60 day comment period.		Enviroafrica	
Comment period ends on 07/10/2020	EAP to notify the registered I&APs (incl. the State departments) of the availability of the draft SR. Commenting period of 30 days + 30days for I&APs and State departments to comment. Ends on 07 October 2020 .		Enviroafrica	
09/10/2020 – 23/11/2020	Submitted Final Scoping Review to DENC for Approval (43 days)		EnviroAfrica / DENC	
28/01/2021 – 01/03/2021	<u>Submit Draft EIR once approval of Final Scoping Report has been received from DENC.</u> Notify I&APs regarding availability of Draft EIR for comment. 30 Day Comment period ended on 1st March 2021 .		EnviroAfrica	
	*Extension to process and invoicing dates due to (i) DEFF's response to COVID-19 (i.e. requirement to extend EIA timeframes and commenting periods) ¹ and (ii) DENC on leave from 15 th December 2020 – 05 th January 2021 (this period of time has to be excluded from the EIA process).			
TBC	Submit Final EIR (depending on types of comments received during the Draft EIR phase and degree to which the report must be amended) for Decision Making (107 day period). Decision period ends on TBC		EnviroAfrica / DENC	
	*Extension to process and invoicing dates due to (i) DEFF's response to COVID-19 (i.e. requirement to extend EIA timeframes and commenting periods) ¹ and (ii) DENC on leave from 15 th December 2020 – 05 th January 2021 (this period of time has to be excluded from the EIA process) .			



Completed



Still to be Completed

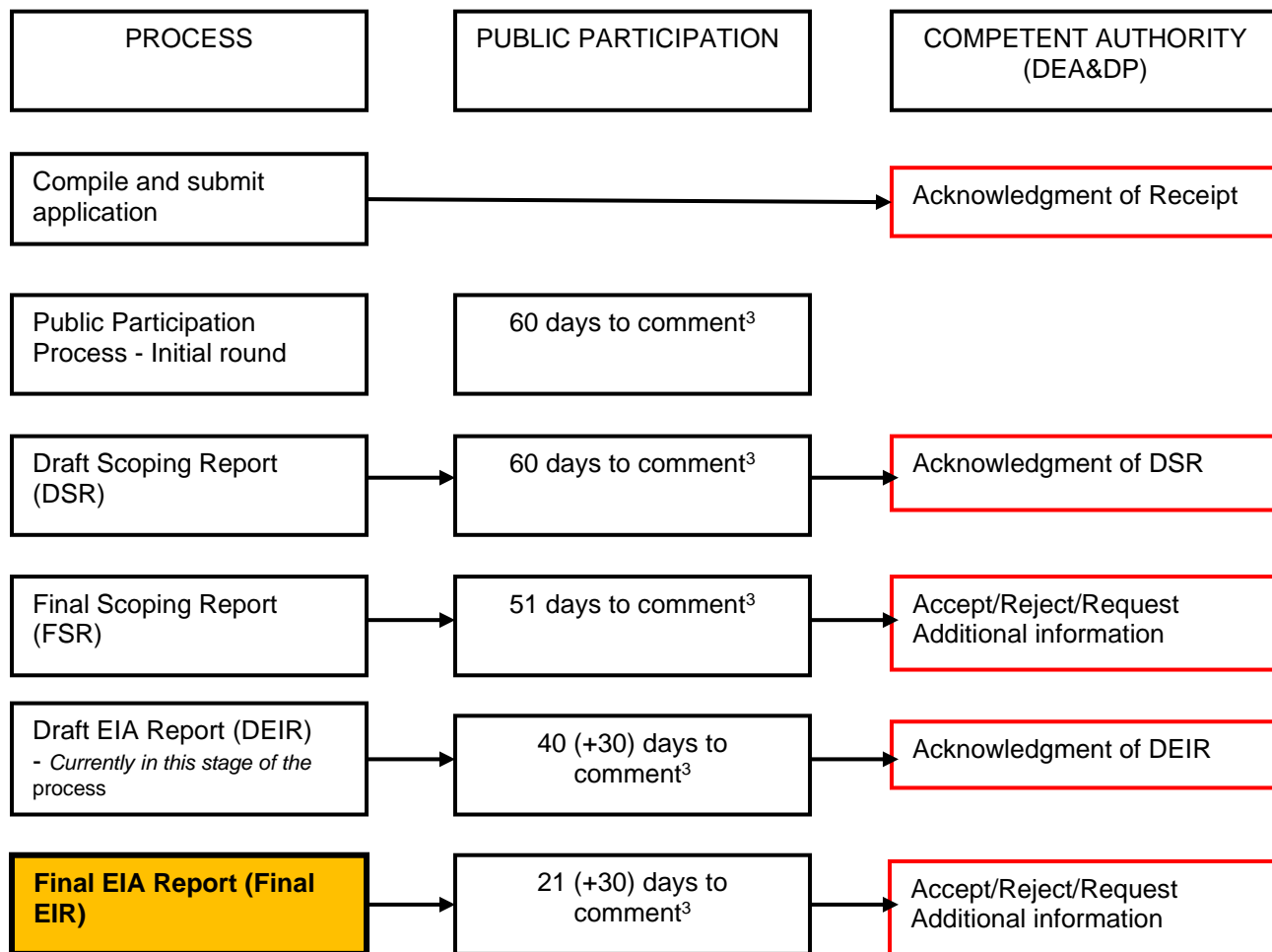


Figure 29. Summary of the EIA process and public participation process. The red indicates the stages where the competent authority was consulted during the process.

6.2 TASKS TO BE UNDERTAKEN DURING THE EIA PHASE

The following tasks must still be undertaken during the EIA phase of the process:

- Compile Draft Environmental Impact Report (EIR) (***This Document***) for public comment based on specialist information.
- Advertise Draft EIR for public comment
- Distribute and/or make the Draft EIR available for viewing and comment
- Receive comments on Draft EIR. All comments received and responses to the comments will be incorporated into the Final Environmental Impact Report (EIR)
- Preparation of a FINAL EIR for submission to DE&NC for consideration and decision-making.

Please refer to Table 3 to see where the public participation process is present in the environmental impact assessment. The Interested and Affected Parties will have the opportunity to view and comment on all the reports that are submitted. The figures also indicate what timeframes are applicable to what stage in the process. If required, meetings with key stakeholders will be held.

At the end of the comment period, the EIR will be revised in response to feedback received from I&APs. All comments received and responses to the comments will be incorporated into the Final Environmental Impact Report (EIR). The Final EIR will then be submitted to DE&NC for consideration and decision-making.

Correspondence with I&APs will be via post, telephone, email, and newspaper advertisements.

Should it be required, this process may be adapted depending on input received during the on-going process and as a result of public input. DE&NC will be informed of any changes in the process.

6.3 PROFESSIONAL TEAM

The following professionals are part of the project team.

Table 4. Members of the professional team

DISCIPLINE	SPECIALIST	ORGANISATION
Environmental Consultants	Clinton Geyser / Bernard de Witt	EnviroAfrica
Town Planners	Len Fourie	MacroPlan Town and Regional Planners
Consulting Engineers	Malcolm du Plessis	Bvi Engineers
Botanist	Peet Botes	PB Consult
Heritage	Jan Englebrecht	Ubique Heritage Consultants
Freshwater	Dr Dirk van Driel	Watsan Africa
Geo-technical	F. J. Breytenbach	Cedarland Geotechnical Consult (Pty) Ltd

6.4 PUBLIC PARTICIPATION

A Public Participation Process was undertaken in accordance with the requirements of the NEMA Environmental Impact Assessment Regulations: Guideline and Information Document Series. *Guidelines on Public Participation 2013* and the NEMA EIA Regulations 2014 (amended). Issues and concerns raised during the Scoping phase are dealt within this report. Please note that the proposed public participation processes were in line with the new Directions, published by the Department of Environment, Forestry, and Fisheries (DEFF) on the 5th June 2020⁵.

7.4.1 PUBLIC PARTICIPATION UNDERTAKEN DURING SCOPING PHASE:

Interested and Affected Parties (I&APs) have been and will be identified throughout the process. Landowners adjacent to the proposed site, relevant organs of state, organizations, ward councillors and the Local and District Municipality were added to this database. A complete list of organisations and individual groups identified to date is shown in **Appendix 3**.

Public Participation will be conducted for the proposed development in accordance with the requirements outlined in Regulation 41 of the NEMA EIA Regulations 2014. The issues and concerns raised during the scoping phase will be dealt with in the EIA phase of this application.

As such each subsection of Regulation 41 contained in Chapter 6 of the NEMA EIA Regulations 2014 will be addressed separately to thereby demonstrate that all potential Interested and Affected Parties (I&AP's) were notified of the proposed development.

R54 (2) (a):

R41 (2) (a) (i): The site notices (A2 and A3 sizes) were placed at different locations around the project site as well as at the municipality office in town. (please refer to **Appendix 3D**). Posters were placed in conspicuous areas such as the entrance to the development and areas receiving the majority of foot traffic.

The posters contained all details as prescribed by R41(3) (a) & (b) and the size of the on-site poster was at least 60cm by 42cm as prescribed by section R41 (4) (a).

R41 (2) (a) (ii): N/A. There is no alternative site.

R41 (2) b):

R41 (2) (b) (i): N/A. The Applicant is the landowner

R41 (2) (b) (ii): The background information document was given to residents adjacent to the proposed site for development via letter drops (**Appendix 3C**).

⁵As per section 4 of the 'Directions Regarding Measures to Address, Prevent and Combat the Spread of COVID-19 Relating to National Environmental Management Permits and Licenses', published on the 5th June 2020 by the Department of Environment, Forestry and Fisheries (DEFF). These new directions state that any notice given after the 5th June 2020 requires an extended 30-day comment period in addition to the legislated 30-day comment period (total of 60-day comment period). If PP was conducted before the 27th March 2020, the formal comment period between 27th March and 5th June 2020 are null and void and therefore, restarted on the 6th June 2020. The initial comment period must be extended by additional 21 days (total of 51 day). Please note that we are still waiting for directives from DEFF on application timelines. These Directives published on the 5th June 2020 apply to Level 3 Lockdown Period and are subject to change.

R41 (2) (b) (iii): An initial notification letter was sent to Mr Silo, the Councillor for Ward 4 (the ward in which the site is situated) (please refer to **Appendix 3C** for proof of notification letters sent). A notification letter, notifying I&APs of the release of the Draft Scoping Report, was sent to Mr Silo as well as Mr Beukes (PR Councillor).

R41 (2) (b) (iv): An initial notification letter was sent to the !Kheis Municipality as the municipality is the Applicant. A notification letter, notifying the I&AP of the release of the Draft Scoping Report, was sent to the Applicant.

R54 (2) (b) (v): Initial notification letter (please refer to **Appendix 3C** for proof of notification letters sent) were sent to the following organs of state having jurisdiction in respect of any aspect of the activity:

- Northern Cape Department of Agriculture and Land Reform
- Department of Co-operative Governance, Human Settlements, and Traditional Affairs
- Department of Roads and Public Works
- Department of Agriculture, Forestry and Fisheries
- Department of Water and Sanitation
- SANRAL
- South African Heritage Resource Agency (SAHRA)
- Department of Social Development
- Department of Economic Development and Tourism
- Department of Transport, Safety and Liaison
- Eskom

A notification letter, notifying the I&AP of the release of the Draft Scoping Report, was sent to the following Registered I&APs:

- Northern Cape Department of Agriculture and Land Reform;
- Department of Cooperative Governance, Human Settlements and Traditional Affairs;
- Department of Roads and Public Works;
- Directorate Forestry Management;
- Department of Water and Sanitation;
- SANRAL;
- South African Heritage Resource Agency;
- Department of Social Development;
- Economic Development and Tourism - Northern Cape;
- Department: Transport, Safety and Liaison;
- Eskom

R41 (2) (c) (i): An advertisement was placed in the local newspaper, Kalahari Bulletin, on the 11th June 2020 (please refer to **Appendix 3B** for proof of advertisement).

R41 (2) (d): N/A

R41 (6):

R41 (6) (a): All relevant facts in respect of the application were made available to potential I&AP's.

R41 (6) (b): I&AP's were given more than a 60-day³ registration and comment period during the first round of public participation.

R42 (a), (b), (c) and R43(2): A register of interested and affected parties was opened, maintained and is available to any person requesting access to the register in writing (please refer to **Appendix 3A** for the list of Interested and Affected Parties).

Please find attached in **Appendix 3:**

- Proof of Notice boards, advertisements and notices that were sent out
- List of registered interested and affected parties
- Summary of issues raised by interested and affected parties

7.4.2 PUBLIC PARTICIPATION UNDERAKEN DURING THE EIA PHASE:

A number of groups and individuals were identified as Interested and Affected Parties during the initial and Scoping Public Participation Process. A complete list of organisations and individual groups identified to date, as well as those I&APs that have registered are shown in **Appendix 3A**.

Full copies of the Environmental Impact Assessment Report (EIR) were made available to all Registered I&APs, and were notified of the Environmental Impact Report (EIR) by means of notifications, informing them of the availability of the Draft EIR and were invited to comment. The EIR was made available for a 30-day comment period³.

At the end of the comment period, the EIR was revised in response to feedback received from I&APs. All comments received and responses to the comments will be incorporated into the Final Environmental Impact Report (Final EIR) in the **form of a Comments and Response Table**. The Final EIR was then submitted to D:E&NC for decision.

Should it be required, this process may be adapted depending on input received during the ongoing process and as a result of public input. Both DENC and registered I&APs will be informed of any changes in the process.

7.4.3 INTERESTED AND AFFECTED PARTIES

Interested and Affected Parties (I&APs) have been notified by means of advertisements in a local newspapers (Kalahari Bulletin), letters, site notices, smses (WinSMS), and/or emails sent to registered I&APs on the project database.

A list of I&APs is included as **Appendix 3A**.

8. ENVIRONMENTAL ISSUES AND POTENTIAL IMPACTS

Environmental issues were raised through informal discussions with the project team, specialists, and authorities, as well as by Interested and Affected Parties during the public participation period of the Scoping Report. All issues raised were addressed and assessed in the specialist reports and services report and forms part of this Environmental Impact Report. Any additional issues raised during the public participation have been listed and addressed in the Final Environmental Impact Report.

The following potential issues have been identified:

6.1 BIODIVERSITY

8.1.1 BOTANICAL

The Botanical Impact Assessment describes and assesses the botanical sensitivity of the area. The terms of reference for this study required a baseline analysis of the flora of the property, including the broad ecological characteristics of the site.

The terms of reference for this appointment were to:

- Evaluate the proposed site(s) in order to determine whether any significant botanical features will be impacted as a result of the proposed development.
- Determine and record the position of any plant species of special significance (e.g. protected tree species, or rare or endangered plant species) that should be avoided or that may require “search & rescue” intervention.
- Locate and record sensitive areas from a botanical perspective within the proposed development footprint that may be interpreted as obstacles to the proposed development.
- Make recommendations on impact minimization should it be required
- Consider short- to long-term implications of impacts on biodiversity and highlight irreversible impacts or irreplaceable loss of species.

8.1.2 FAUNA

8.1.2 FAUNA

Please note that no fauna or avi-fauna screening was done as part of this study and that the following notes are just observations with regards to status of the study area and observations made during the botanical site visit. The proposed site is located adjacent to the existing settlement where current land-uses include illegal dumping and livestock grazing. The vegetation associated can be classified as disturbed due to previous human-induced activities (i.e. trampling, overgrazing, illegal dumping of waste, and transformation of land leading to erosion).

Faunal diversity changes through space and time and are directly influenced by anthropogenic activities, including animal husbandry (i.e. overgrazing by livestock) and human settlements (e.g. transformation of

land) (Tilman et al., 1997⁶; Chapin et al., 2000)⁷. Direct impacts are typically associated with urban land expansion, leading to land cover changes (and consequent loss of natural areas) and edge effects, whereas indirect impacts include impacts associated with the generation of waste (e.g. general or sewage) and its management (McDonald et al., 2020)⁸. Edge effects have diverse impacts on biodiversity and ecological functioning (Razafindratsima et al., 2018)⁹. Such effects contribute to a disturbance factor, which is likely to have driven most wild animals away from the proposed site for development due to activities associated with the adjacent settlement. It is considered highly unlikely that any large game remains in this area and were not observed within the development footprint during the site visit. This in turn would have affected the food chain and ultimately the density of tertiary predators, particularly mammals and larger birds of prey, while smaller predators and scavengers such as jackal and caracal may have been eradicated by community members in existing settlements in fear of their livestock. Due to long-term impacts associated with human settlements, compounded by the proximity of the proposed development areas to the urban edge, a comprehensive faunal survey is not deemed necessary.

Mammals

The Kgalagadi Transfrontier Park (approximately 250km) and Tswalu Kalahari Reserve (approximately 144km) are the closest protected areas to the proposed site for development. Mammalian species present in these reserves include, but are not limited to the African Striped Weasel, African Wild Cat, African Wild Dog (Painted Wolf) Antbear (Aardvark), Bat-Eared Fox, Black-Backed Jackal, Black-Tailed Tree Rat, Blue Wildebeest, Brant's Whistling Rat, Brown Hyena, Bushveld Elephant-Shrew, Cape Golden Mole, Cape Hare, Cape Serotine Bat, Caracal, Chacma Baboon, Cheetah, Common Mole Rat, Damara Mole Rat, Desert Musk Shrew, Egyptian Free-Tailed Bat, Egyptian Slit-Faced Bat, Eland, Gemsbok, Giraffe, Grass Climbing Mouse, Grey Duiker, Ground Squirrel, Hairy-Footed Gerbil, Highveld Gerbil, Honey Badger, Kudu, Large-Eared Mouse, Leopard, Lion, Namaqua Rock Mouse, Pangolin, Porcupine, Pouched Mouse, Pygmy Mouse, Red Hartebeest Round-Eared Elephant Shrew, Short-Tailed Gerbil, Silver (Cape) Fox, Slender Mongoose, Small Spotted Cat, Small-Spotted Genet, South African Hedgehog, Spotted Hyena, Springbok, Springhare Steenbok, Striped Mouse Striped Polecat, Suricate, Vervet Monkey, Warthog, Woosnam's Desert Rat, and Yellow Mongoose (<https://www.sanparks.org/parks/kgalagadi/conservation/ff/mammals.php>) / (<https://tswalu.com/wp-content/uploads/2019/07/Tswalu-Information-Guide-2019.pdf>). However, the only mammals observed on site include livestock (namely goats, sheep, and / or cows). Moreover, as per the Freshwater Report, no other endangered species, either plant or animal, were observed within or near the drainage line.

Avifauna

Although the Bushmanland Arid Grassland vegetation type potentially attracts a number of bird species, the low vegetation species diversity (associated with the proposed site for development), is likely to result in a low avifaunal diversity, where avifaunal diversity is directly influenced by land cover (i.e. intact vegetation) (Lepczyk et al., 2017)¹⁰. Limited vegetation, present on site, is available to provide a range of

⁶ Tilman, D. and Wardle, D.A., 1997. Biodiversity And Ecosystem Properties. *Science*, 278 (5345), pp.1865-1869.

⁷ Chapin Iii, F.S., Zavaleta, E.S., Eviner, V.T., Naylor, R.L., Vitousek, P.M., Reynolds, H.L., Hooper, D.U., Lavelle, S., Sala, O.E., Hobbie, S.E. and Mack, M.C., 2000. Consequences of changing biodiversity. *Nature*, 405(6783), pp.234-242.

⁸ McDonald, R.I., Mansur, A.V., Ascensão, F., Crossman, K., Elmquist, T., Gonzalez, A., Güneralp, B., Haase, D., Hamann, M., Hillel, O. and Huang, K., 2020. Research gaps in knowledge of the impact of urban growth on biodiversity. *Nature Sustainability*, 3(1), pp.16-24.

⁹ Razafindratsima, O.H., Brown, K.A., Carvalho, F., Johnson, S.E., Wright, P.C. and Dunham, A.E., 2018. Edge effects on components of diversity and above-ground biomass in a tropical rainforest. *Journal of applied ecology*, 55(2), pp.977-985.

¹⁰ Lepczyk, C.A., La Sorte, F.A., Aronson, M.F., Goddard, M.A., MacGregor-Fors, I., Nilon, C.H. and Warren, P.S., 2017. Global patterns and drivers of urban bird diversity. In *Ecology and conservation of birds in urban environments* (pp. 13-33). Springer, Cham.

avifauna adequate habitat for survival, and therefore, it was not envisaged that a comprehensive avifaunal survey was deemed necessary.

Reptile & amphibians

No reptile or amphibian species were observed during the site survey. The project footprint may provide habitat for a number of reptile species, but they would most likely be terrestrial species adapted to grasslands and preying on avifauna and small mammal species. No amphibian species are likely to occur due to a lack of adequate aquatic and wetland habitat within the proposed footprint.

6.2 HERITAGE

The possible impact on heritage resources (archaeological and palaeontological) has been identified as a possible environmental impact as a result of the construction of the residential development and associated infrastructure.

A Heritage Impact Assessment (**Appendix 6B**) has been conducted on the site.

The terms of reference for the heritage and archaeological study are as follows:

- the identification and mapping of all heritage resources in the area affected;
- an assessment of the significance of such resources in terms of heritage assessment criteria set out in regulations;
- an assessment of the impact of the development on heritage resources;
- an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development;
- if heritage resources will be adversely affected by the proposed development, the consideration of alternatives; and
- plans for mitigation of any adverse effects during and after completion of the proposed development.

Also, the HIA should comply with the requirements of NEMA, including providing the assumptions and limitations associated with the study; the details, qualifications and expertise of the person who prepared the report; and a statement of competency.

6.3 FRESHWATER ASSESSMENT

Freshwater ecosystems were identified on desktop analysis, and due to the size and nature of the development and the unknown source of standing water within the development site, a freshwater impact assessment will be conducted. Any potential impacts to the Orange River will also be investigated.

The terms of reference for the Freshwater assessment are as follows:

- Literature review and assessment of existing information
- Site Assessment of the proposed activities and impact on the associated freshwater systems. This will include an assessment of the freshwater ecological condition, using river health indices such as in-stream and riparian habitat integrity, aquatic macro-invertebrates and riparian vegetation to determine set back lines and geomorphological condition of the streams, which will then determine

the overall Ecstatus of the streams and provide data that will inform the Water Use Licence Application of the project.

- Describe ecological characteristics of freshwater systems and compile report based on the data and information collected in the previous two tasks, describe ecological characteristics of the freshwater systems, comment on the conservation value and importance of the freshwater systems and delineate the outer boundary of the riparian zones/riverine corridors.
- Evaluate the freshwater issues on the site and propose mitigation measures and measures for the rehabilitation of the site as well as setback lines for future development.
- Compilation of the documentation for submission of the water use authorisation application (WULA) to the Department of Water and Sanitation (if deemed necessary).

6.4 GEO-TECHNICAL ASSESSMENT

A Geo-technical assessment was required to provide information related to the soil types, soil potential, soil stability, subsoil structure, suitability of the area to support the proposed structures and recommendation for foundations.

The Geo-technical assessment is included as **Appendix 6D**.

6.5 VISUAL IMPACT

The potential impact on the sense of place of the proposed residential development has also been considered. However, due to the nature of the activity, the surrounding land-uses and the proximity to other existing residential area, and that the sense of place is not expected to be significantly altered by the proposed residential development, no further studies were suggested.

6.6 Traffic Impact Assessment

A letter was submitted to SANRAL (Appendix 3E.2.1). The objectives of the letter were to:

1. To 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 in regards to the proposed access point.

In response (6th October 2020), SANRAL, stated no objection to the Proposed Rezoning and Subdivision of the proposed site earmarked for development. However, access approval by SANRAL can only be determined by the undertaking of a TIA in order to identify 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, a Traffic Impact Assessment must be made a condition on granting the Environmental Authorisation.

6.7 OTHER ISSUES AND IMPACTS

The proposed Groblershoop Housing Development has the following additional impacts:

6.7.1 ENERGY REQUIREMENTS

Construction energy requirements:

The proposed development involves the construction of approximately 1500 erven. Subsequently, the initial energy requirements of the project will basically be limited to the use of small power tools, plant such as mixers etc. typically to be powered by portable on-site generators.

Operational phase energy requirements:

According to the Engineering Services Investigation Report, although the existing feeder can service the future additional 660kVA load, this can only be carried out once the 10MVA Groblershoop substation has been upgraded to a 20MVA substation by Eskom (to be commissioned in December 2020).

6.1.1 WATER REQUIREMENTS

Construction water requirements:

Water requirements during the construction phase are unknown at this stage, but it is estimated that a maximum amount in the order of 100 - 150 kiloliter per day will be required for construction purposes, depending on phasing of construction.

Operational phase water requirements:

According to Draft Engineering Services Investigation Report, the Annual Average Daily Demand will be 709.8m³/day.

6.1.1 NATURE AND QUANTITY OF RAW MATERIALS

This project comprises the construction of approximately 1500 residential and other structures. Subsequently several thousand cubic meters of crushed stone, sand and / or cement will be utilized together with reinforcing steel, wood and other material used in the construction of residential units, schools, businesses, etc., as input materials during construction.

Exact quantities can only be determined once detailed designs of the structures have been completed.

This development is not expected to utilize any raw materials during the operational phase, besides water usage.

6.1.1 WASTE TYPES, QUANTITIES AND DISPOSAL METHODS

Construction Phase

As this is a “greenfields” project, there are no existing structures to be demolished. It is therefore envisaged that very little building rubble and waste will be generated during construction. Typically, losses of raw materials due to transport, stockpiling on site and conveyance losses amount to approximately 5% of the volumes required. It is not known how much solid waste will be generated during the construction period. This waste will however typically be builder’s rubble, concrete debris, timber from used shutters, etc. The waste will be stockpiled on site and periodically disposed of at the nearest licensed landfill site by the contractor. A designated spoil site will be investigated for stockpiling of material.

The large amounts of litter presently on site will also need to be consolidated, removed from site and disposed of at the nearest approved municipal waste disposal site.

Operational Phase

Since the development is generally a residential development, general residential household waste is expected to be generated. Refuse removal should be via the Municipal waste stream and disposed of at the nearest, registered municipal bulk solid waste disposal site.

6.1.2 EMPLOYMENT OPPORTUNITIES

Please refer to Section 5.7 and Table 1 for the anticipated employment opportunities expected from the proposed development.

9. SPECIALIST STUDIES

Based on the environmental sensitivities as per the DEA Screening Tool, issues raised by the I&APs and the project team, specialist studies were undertaken to provide information to address the concerns and assess the impacts of the proposed development alternatives on the environment.

The specialists were provided with set criteria for undertaking their assessments, to allow for comparative assessment of all issues. These criteria are detailed in the Terms of Reference to each specialist and summarised below.

7.1 CRITERIA FOR SPECIALIST ASSESSMENT OF IMPACTS

These criteria are based on the EIA Regulations, published by the Department of Environmental Affairs and Tourism (April 1998) in terms of the Environmental Conservation Act No. 73 of 1989.

These criteria include:

- **Nature of the impact**
This is an appraisal of the type of effect the construction, operation and maintenance of a development would have on the affected environment. This description should include what is to be affected and how.
- **Extent of the impact**
Describe whether the impact will be: local extending only as far as the development site area; or limited to the site and its immediate surroundings; or will have an impact on the region, or will have an impact on a national scale or across international borders.
- **Duration of the impact**
The specialist should indicate whether the lifespan of the impact would be short term (0-5 years), medium term (5-15 years), long terms (16-30 years) or permanent.
- **Intensity**
The specialist should establish whether the impact is destructive or benign and should be qualified as low, medium or high. The specialist study must attempt to quantify the magnitude of the impacts and outline the rationale used.
- **Probability of occurrence**
The specialist should describe the probability of the impact actually occurring and should be described as improbable (low likelihood), probable (distinct possibility), highly probable (most likely) or definite (impact will occur regardless of any prevention measures).

The impacts should also be assessed in terms of the following aspects:

- **Status of the impact**
The specialist should determine whether the impacts are negative, positive or neutral ("cost – benefit" analysis). The impacts are to be assessed in terms of their effect on the project and the environment. For example, an impact that is positive for the proposed development may be negative for the environment. It is important that this distinction is made in the analysis.
- **Accumulative impact**
Consideration must be given to the extent of any accumulative impact that may occur due to the proposed development. Such impacts must be evaluated with an assessment of similar

developments already in the environment. Such impacts will be either positive or negative, and will be graded as being of negligible, low, medium or high impact.

- **Degree of confidence in predictions**

The specialist should state what degree of confidence (low, medium or high) is there in the predictions based on the available information and level of knowledge and expertise.

Based on a synthesis of the information contained in the above-described procedure, the specialist is required to assess the potential impacts in terms of the following significance criteria:

- **No significance:** the impacts do not influence the proposed development and/or environment in any way.
- **Low significance:** the impacts will have a minor influence on the proposed development and/or environment. These impacts require some attention to modification of the project design where possible, or alternative mitigation.
- **Moderate significance:** the impacts will have a moderate influence on the proposed development and/or environment. The impact can be ameliorated by a modification in the project design or implementation of effective mitigation measures.
- **High significance:** the impacts will have a major influence on the proposed development and/or environment.

The final impact assessment report should at least include the following sections:

- Executive Summary
- Introduction and Description of Study
- Methodology
- Results
- Assessment of Impacts (including mitigation measures to reduce negative impacts and measures to enhance positive impacts and the completion of impact tables)
- Discussion
- Recommendations (Pre-Construction, Construction and Operational Phases)
- Conclusion

9.2 BRIEFS FOR SPECIALIST STUDIES TO BE UNDERTAKEN AS PART OF THE EIA

9.2.1 BOTANICAL ASSESSMENT

Peet Botes (PB Consult) was appointed and undertook the Botanical Assessment on the proposed site – **Appendix 6A**.

The terms of reference for this appointment were to:

- Evaluate the proposed site(s) in order to determine whether any significant botanical features will be impacted as a result of the proposed development.
- Determine and record the position of any plant species of special significance (e.g. protected tree species, or rare or endangered plant species) that should be avoided or that may require “search & rescue” intervention.

- Locate and record sensitive areas from a botanical perspective within the proposed development footprint that may be interpreted as obstacles to the proposed development.
- Make recommendations on impact minimization should it be required
- Consider short- to long-term implications of impacts on biodiversity and highlight irreversible impacts or irreplaceable loss of species.

9.2.2 HERITAGE IMPACT ASSESSMENT

Jan Engelbrecht of the Ubique Heritage Consultants was appointed to compile the Heritage Impact Assessment (HIA) – **Appendix 6B**.

The terms of reference for the heritage impact study were:

- the identification and mapping of all heritage resources in the area affected;
- an assessment of the significance of such resources in terms of heritage assessment criteria set out in regulations;
- an assessment of the impact of the development on heritage resources;
- an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development;
- if heritage resources will be adversely affected by the proposed development, the consideration of alternatives; and
- plans for mitigation of any adverse effects during and after completion of the proposed development.

Also, the HIA/AIA should comply with the requirements of NEMA, including providing the assumptions and limitations associated with the study; the details, qualifications and expertise of the person who prepared the report; and a statement of competency.

9.2.3 FRESHWATER ASSESSMENT

Dr Dirk van Driel (Watsan Africa) has been appointed to undertake the Freshwater Assessment for the proposed development – **Appendix 6C**.

The terms of reference for the Freshwater assessment are as follows:

- Literature review and assessment of existing information
- Site Assessment of the proposed activities and impact on the associated freshwater systems. This will include an assessment of the freshwater ecological condition, using river health indices such as in-stream and riparian habitat integrity, aquatic macro-invertebrates and riparian vegetation to determine set back lines and geomorphological condition of the streams, which will then determine the overall Ecstatus of the streams and provide data that will inform the Water Use Licence Application of the project.
- Describe ecological characteristics of freshwater systems and compile report based on the data and information collected in the previous two tasks, describe ecological characteristics of the freshwater systems, comment on the conservation value and importance of the freshwater systems and delineate the outer boundary of the riparian zones/riverine corridors.
- Evaluate the freshwater issues on the site and propose mitigation measures and measures for the rehabilitation of the site as well as setback lines for future development.

- Compilation of the documentation for submission of the water use authorisation application (WULA) to the Department of Water and Sanitation (if deemed necessary).

9.2.4 GEO-TECHNICAL ASSESSMENT

Cedarland Geotechnical Consult (Pty) Ltd was appointed to conduct the Geo-technical Assessment of the proposed site - **Appendix 6D**.

The primary objective of this study is to provide information related to the soil types, soil potential, soil stability, subsoil structure, suitability of the area to support the proposed structures and recommendation for foundations.

10. ASSESSMENT OF ENVIRONMENTAL IMPACTS

The specialist studies detailed in Section 8 were undertaken to determine significance of the impacts that may arise from the proposed development. The findings of the specialist studies are summarised here. Full copies of the studies are included in **Appendices 6A – 6E**.

The following specialist studies were undertaken:

10.1 BOTANICAL ASSESSMENT

Peet Botes (PB Consult) was appointed and undertook the Botanical Assessment on the proposed site – The Botanical Impact Assessment is included as **Appendix 6A**.

10.1.1 KEY FINDINGS

A Botanical Impact Assessment (**Appendix 6A**) was conducted to determine if there is any sensitive or endangered vegetation on the proposed site. Due to the size of the development (approximately 95ha), there will be a significant loss of vegetation during the construction phase of the project, of which approximately 60-70% is still covered by indigenous vegetation in a good condition. The site is located within a CBA area however, the specialist stated that large portions of the proposed site is already disturbed, and that there is no real alternative site within the Municipal town boundaries that is not located within the CBA. no recognized centre of endemism will be impacted by the proposed development. The transformation of the site will destroy connectivity on the site but should not result in a significant impact on the surrounding area, where connectivity is still excellent. The existing disturbance footprint has been described (please see Figure 6).

The northern and north-eastern corner of the site (nearest to Groblershoop) was mostly covered by a low white grass dominated sparse shrubland typical of the variation of Bushmanland Arid Grassland vegetation found on shallow soils dominated by calcrete (calcrete outcrops was often observed throughout the site). Although the Northern Cape are in the midst of a severe drought (the last 5 – 7 years), the effect of recent rains can be seen in the display of grasses and even the shrub layer encountered. However, the rain was apparently not yet enough to trigger a display of annual herbaceous species. Bulb species were also rarely observed.

The vegetation varied from an open grassland dominated by white grasses to a sparse low (<0.5 m) shrubland dominated by the white stemmed *Justicia australis* (=Monechma) in combination with *Tetraena decumbens*, *Salsola zeyheri*, *Tetraena microcarpa*. Dense stands of *Aloe claviflora* were often encountered, in fact they are so common that the local people uses them to demarcate erven (Photo 8). The following plants were also observed scattered throughout the small ("verneuk halfmensie") *Acanthopsis disperma*, the common *Aptosimum spinescens*, *Barleria lichtensteiniana*, *Boscia albitrunca*, patches of *Cynanchum viminalis*, the nine-awned grass *Enneapogon cenchroides*, *Euphorbia gariepina*, and occasionally the smaller *Euphorbia spinea*, *Geigeria ornativa*, *Justicia incana*, *Kleinia longiflora*, *Lacomucinaea lineata* (= *Thesium lineatum*), *Leucosphaera bainesii*, *Lycium cinereum*, *Rhigozum trichotomum*, *Senegalia mellifera* (occasionally) and the creeping *Trianthema parvifolia*. In the disturbed northern corner of the site, the vegetation was often dominated by dense stands of the alien *Prosopis* tree

Table 5. Protected, non-protected, and alien invasive plant species recorded during the site visit (Appendix 6A).

No.	Species name	FAMILY	Status	Alien & invader plant (AIP)
1.	<i>Acanthopsis disperma</i>	ACANTHACEAE	LC	
2.	<i>Acanthopsis hoffmannseggiana</i>	ACANTHACEAE	LC	
3.	<i>Aizoon burchellii</i>	AIZOACEAE	Not evaluated NCNCA, Schedule 2 Protected (all species in this Family)	Apply for a NCNCA Flora permit (DENC)
4.	<i>Aloe claviflora</i>	ASPODELACEAE	LC NCNCA, Schedule 2 Protected (all species in this Family)	Apply for a NCNCA Flora permit (DENC)
5.	<i>Aptosimum spinescens</i>	SCROPHULARIACEAE	LC	
6.	<i>Aristida adscensionis</i>	POACEAE	LC	
7.	<i>Aristida congesta</i>	POACEAE	LC	
8.	<i>Asparagus cf. capensis</i>	ASPARAGACEAE	LC	
9.	<i>Asparagus</i> species	ASPARAGACEAE	LC	
10.	<i>Barleria lichtensteiniana</i>	ACANTHACEAE	LC	
11.	<i>Boscia albitrunca</i>	BRASSICACEAE (CAPPARACEAE)	LC NFA protected species NCNCA, Schedule 2 Protected (all species of Boscia)	Apply for a NFA Tree permit (DAFF) Apply for a NCNCA Flora permit (DENC)
12.	<i>Cynanchum viminalis</i> (= <i>Sarcostemma viminalis</i>)	APOCYNACEAE	LC NCNCA, Schedule 2 Protected (all species in this Family)	Apply for a NCNCA Flora permit (DENC)
13.	<i>Enneapogon cenchroides</i>	POACEAE	LC	
14.	<i>Euphorbia braunsii</i>	EUPHORBIACEAE	LC NCNCA, Schedule 2 Protected (all species in this Genus)	Apply for a NCNCA Flora permit (DENC)
15.	<i>Euphorbia gariepina</i>	EUPHORBIACEAE	NCNCA, Schedule 2 Protected (all species in this Genus)	Apply for a NCNCA Flora permit (DENC)
16.	<i>Euphorbia spinea</i>	EUPHORBIACEAE	LC NCNCA, Schedule 2 Protected (all species in this Genus)	Apply for a NCNCA Flora permit (DENC)
17.	<i>Galenia africana</i>	AIZOACEAE	LC NCNCA, Schedule 2 Protected (all species in this Family)	Apply for a NCNCA Flora permit (DENC)
18.	<i>Geigeria ornativa</i>	ASTERACEAE	LC	
19.	<i>Justicia australis</i> (= <i>Monechma genistifolium</i>)	ACANTHACEAE	LC	
20.	<i>Justicia incana</i> (= <i>Monechma incanum</i>)	ACANTHACEAE	LC	
21.	<i>Kleinia longiflora</i>	ASTERACEAE	LC	
22.	<i>Lacomucinaea lineata</i> (= <i>Thesium lineatum</i>)	SANTALACEAE	LC	
23.	<i>Leucosphaera bainesii</i>	AMARANTHACEAE	LC	

No.	Species name	FAMILY	Status	Alien & invader plant (AIP)
24.	<i>Lycium cinereum</i>	SOLANACEAE	LC	
25.	<i>Momordica balsamina</i>	CUCURBITACEAE	LC	
26.	<i>Parkinsonia africana</i>	FABACEAE	LC	
27.	<i>Phaeoptilum spinosum</i>	NYCTAGINACEAE	LC	
28.	<i>Prosopis</i> species	FABACEAE	Alien invasive plant species	
29.	<i>Rhigozum trichotomum</i>	BIGONACEAE	LC	
30.	<i>Rogeria longiflora</i>	PEDALIACEAE	LC	
31.	<i>Ruschia divaricata</i>	AIZOACEAE	Protected in terms of schedule 2 of the NCNCA	Apply for a NCNCA Flora permit (DENC)
32.	<i>Salsola kali</i>	AMARANTHACEAE	Naturalised invasive	1b
33.	<i>Salsola zeyheri</i>	AMARANTHACEAE	LC	
34.	<i>Senegalia mellifera</i> (=Acacia mellifera)	FABACEAE	LC	
35.	<i>Stipagrostis</i> species	POACEAE	LC	
36.	<i>Stipagrostis uniplumis</i>	POACEAE	LC	
37.	<i>Tapinanthus oleifolius</i>	LORANTHACEAE	LC	
38.	<i>Tetraena decumbens</i> (=Zygophyllum decumbens)	ZYGOPHYLLACEAE	LC	
39.	<i>Tetraena microcarpa</i> (=Zygophyllum microcarpum)	ZYGOPHYLLACEAE	LC	
40.	<i>Tetraena simplex</i> (=Zygophyllum simplex)	ZYGOPHYLLACEAE	LC	
41.	<i>Trianthema parvifolia</i>	AIZOACEAE	LC NCNCA, Schedule 2 Protected (all species in this Family)	
42.	<i>Ziziphus mucronata</i>	RHAMNACEAE	LC	

The remainder of the property was characterised by red sandy soils that varied in depth, but also showed outcrops of calcrete scattered throughout. At the higher lying western boundary of the site (near area 5 in Figure 5) even quartzite was exposed in small patches. The vegetation varied depending on the depth of the sand, Deeper sandy soils was characterized by denser and larger stands of small trees like *Senegalia mellifera* and larger shrubs like *Phaeoptilum spinosum*, *Lycium cinereum* and *Rhigozum trichotomum*



Plant species encountered included the following: The small *Acanthopsis hoffmannseggiana*, *Aizoon burchellii*, *Aloe claviflora*, *Aptosimum spinescens*, *Asparagus* cf. *capensis*, *Asparagus* species, *Boscia albitrunca*, patches of *Cynanchum viminalis*, *Euphorbia gariepina*, *Euphorbia braunsii*, *Euphorbia spinea*, *Galenia africana*, *Geigeria ornativa*, *Justicia incana*, *Kleinia longiflora*, *Lacomucinaea lineata* (= *Thesium lineatum*), *Leucosphaera bainesii*, *Lycium cinereum*, the climbing balsam pear, *Momordica balsamina*, *Phaeoptilum spinosum*, the common *Rhigozum trichotomum*, *Rogeria longiflora*, the spiny *Ruschia divaricata*, *Salsola kali*, *Salsola zeyheri*, *Senegalia mellifera*, *Tapinanthus oleifolius* and *Ziziphus mucronata*.



With regards to plant species of conservational importance, no red listed species or NEM:BA protected plant species were observed whereas one (1) NFA protected tree species (namely *Boscia albitrunca*) was observed at the following locations:

S28° 54' 33.4" E21° 59' 54.2"
S28° 54' 35.1" E21° 59' 54.0"
S28° 54' 37.5" E21° 59' 54.2"
S28° 54' 46.8" E21° 59' 54.5"
S28° 54' 47.9" E21° 59' 52.3"
S28° 54' 52.1" E21° 59' 54.6"
S28° 54' 57.4" E21° 59' 58.4"
S28° 55' 05.0" E22° 00' 02.6"
S28° 55' 06.0" E22° 00' 02.8"
S28° 55' 07.4" E22° 00' 01.5"
S28° 55' 10.4" E22° 00' 01.1"
S28° 55' 09.2" E22° 00' 00.3"
S28° 55' 03.2" E21° 59' 54.7"
S28° 54' 35.6" E21° 59' 42.0"

A NFA permit is required as well as a NCNCA permit for the removal of any of these plant individuals. Various NCNCA protected plant species were observed during the Botanical Assessment and are listed in the Table below].

Table 6. NCNCA protected plant species observed within the proposed development footprint. Source: Botanical Impact Assessment (Appendix 6A).

NO.	SPECIES NAME	COMMENTS	RECOMMENDATIONS
1.	<i>Aizoon burchellii</i> Schedule 2 protected	Occasionally observed in deeper sandy areas.	Species protection through topsoil conservation.
2.	<i>Aloe claviflora</i> Schedule 2 protected	Very common in the north eastern part of the property.	Very common plant in this area.
3.	<i>Boscia albitrunca</i> Schedule 2 protected		
4.	<i>Cynanchum viminalis</i> Schedule 2 protected	Occasionally observed within the footprint.	Larger <i>Cynanchum</i> plants are expected to transplant poorly. Species protection through topsoil conservation.
5.	<i>Euphorbia braunsii</i> Schedule 2 protected		Search & rescue: Occasionally observed. Individuals within footprint to be transplanted to surrounding area.
6.	<i>Euphorbia gariepina</i> Schedule 2 protected		Very common plant in this area. Species protection through topsoil conservation.

NO.	SPECIES NAME	COMMENTS	RECOMMENDATIONS
7.	<i>Euphorbia spinea</i> Schedule 2 protected		Very common plant in this area. Species protection through topsoil conservation.
8.	<i>Galenia africana</i> Schedule 2 protected	This plant is weedy a disturbance indicator and commonly found in Erf 1654.	No special measures needed, this is a weedy pioneer species.
9.	<i>Ruschia divaricata</i> Schedule 2 protected		Very common plant in this area. Species protection through topsoil conservation.
10.	<i>Trianthema parvifolia</i> Schedule 2 protected		A common plant. Species protection through topsoil conservation.

8.1.2 FAUNA

Please note that no fauna or avi-fauna screening was done as part of this study and that the following notes are just observations with regards to status of the study area and observations made during the botanical site visit. The proposed site is located adjacent to the existing settlement where current land-uses include illegal dumping and livestock grazing. The vegetation associated can be classified as disturbed due to previous human-induced activities (i.e. trampling, overgrazing, illegal dumping of waste, and transformation of land leading to erosion).

Faunal diversity changes through space and time and are directly influenced by anthropogenic activities, including animal husbandry (i.e. overgrazing by livestock) and human settlements (e.g. transformation of land) (Tilman et al., 1997¹¹; Chapin et al., 2000)¹². Direct impacts are typically associated with urban land expansion, leading to land cover changes (and consequent loss of natural areas) and edge effects, whereas indirect impacts include impacts associated with the generation of waste (e.g. general or sewage) and its management (McDonald et al., 2020)¹³. Edge effects have diverse impacts on biodiversity and ecological functioning (Razafindratsima et al., 2018)¹⁴. Such effects contribute to a disturbance factor, which is likely to have driven most wild animals away from the proposed site for development due to activities associated with the adjacent settlement. It is considered highly unlikely that any large game remains in this area and were not observed within the development footprint during the site visit. This in turn would have affected the food chain and ultimately the density of tertiary predators, particularly mammals and larger birds of prey,

¹¹ Tilman, D. and Wardle, D.A., 1997. Biodiversity And Ecosystem Properties. *Science*, 278 (5345), pp.1865-1869.

¹² Chapin Iii, F.S., Zavaleta, E.S., Eviner, V.T., Naylor, R.L., Vitousek, P.M., Reynolds, H.L., Hooper, D.U., Lavorel, S., Sala, O.E., Hobbie, S.E. and Mack, M.C., 2000. Consequences of changing biodiversity. *Nature*, 405(6783), pp.234-242.

¹³ McDonald, R.I., Mansur, A.V., Ascensão, F., Crossman, K., Elmqvist, T., Gonzalez, A., Güneralp, B., Haase, D., Hamann, M., Hillel, O. and Huang, K., 2020. Research gaps in knowledge of the impact of urban growth on biodiversity. *Nature Sustainability*, 3(1), pp.16-24.

¹⁴ Razafindratsima, O.H., Brown, K.A., Carvalho, F., Johnson, S.E., Wright, P.C. and Dunham, A.E., 2018. Edge effects on components of diversity and above-ground biomass in a tropical rainforest. *Journal of applied ecology*, 55(2), pp.977-985.

while smaller predators and scavengers such as jackal and caracal may have been eradicated by community members in existing settlements in fear of their livestock. Due to long-term impacts associated with human settlements, compounded by the proximity of the proposed development areas to the urban edge, a comprehensive faunal survey is not deemed necessary.

Mammals

The Kgalagadi Transfrontier Park (approximately 250km) and Tswalu Kalahari Reserve (approximately 144km) are the closest protected areas to the proposed site for development. Mammalian species present in these reserves include, but are not limited to the African Striped Weasel, African Wild Cat, African Wild Dog (Painted Wolf) Antbear (Aardvark), Bat-Eared Fox, Black-Backed Jackal, Black-Tailed Tree Rat, Blue Wildebeest, Brant's Whistling Rat, Brown Hyena, Bushveld Elephant-Shrew, Cape Golden Mole, Cape Hare, Cape Serotine Bat, Caracal, Chacma Baboon, Cheetah, Common Mole Rat, Damara Mole Rat, Desert Musk Shrew, Egyptian Free-Tailed Bat, Egyptian Slit-Faced Bat, Eland, Gemsbok, Giraffe, Grass Climbing Mouse, Grey Duiker, Ground Squirrel, Hairy-Footed Gerbil, Highveld Gerbil, Honey Badger, Kudu, Large-Eared Mouse, Leopard, Lion, Namaqua Rock Mouse, Pangolin, Porcupine, Pouched Mouse, Pygmy Mouse, Red Hartebeest Round-Eared Elephant Shrew, Short-Tailed Gerbil, Silver (Cape) Fox, Slender Mongoose, Small Spotted Cat, Small-Spotted Genet, South African Hedgehog, Spotted Hyena, Springbok, Springhare Steenbok, Striped Mouse Striped Polecat, Suricate, Vervet Monkey, Warthog, Woosnam's Desert Rat, and Yellow Mongoose (<https://www.sanparks.org/parks/kgalagadi/conservation/ff/mammals.php>) / (<https://tswalu.com/wp-content/uploads/2019/07/Tswalu-Information-Guide-2019.pdf>). However, the only mammals observed on site include livestock (namely goats, sheep, and / or cows). Moreover, as per the Freshwater Report, no other endangered species, either plant or animal, were observed within or near the drainage line.

Avifauna

Although the Bushmanland Arid Grassland vegetation type potentially attracts a number of bird species, the low vegetation species diversity (associated with the proposed site for development), is likely to result in a low avifaunal diversity, where avifaunal diversity is directly influenced by land cover (i.e. intact vegetation) (Lepczyk *et al.*, 2017)¹⁵. Limited vegetation, present on site, is available to provide a range of avifauna adequate habitat for survival, and therefore, it was not envisaged that a comprehensive avifaunal survey was deemed necessary.

Reptile & amphibians

No reptile or amphibian species were observed during the site survey. The project footprint may provide habitat for a number of reptile species, but they would most likely be terrestrial species adapted to grasslands and preying on avifauna and small mammal species. No amphibian species are likely to occur due to a lack of adequate aquatic and wetland habitat within the proposed footprint.

10.1.2 IMPACT ASSESSMENT

Direct impacts

According to the Botanical Impact Assessment (**Appendix 6A**), the main impacts associated with the proposed development will be:

- The transformation of 95 ha of indigenous vegetation within a proposed CBA; and

¹⁵ Lepczyk, C.A., La Sorte, F.A., Aronson, M.F., Goddard, M.A., MacGregor-Fors, I., Nilon, C.H. and Warren, P.S., 2017. Global patterns and drivers of urban bird diversity. In *Ecology and conservation of birds in urban environments* (pp. 13-33). Springer, Cham.

- The potential impact on numerous nationally protected trees as well as provincially protected plant species.

10.1.3 MITIGATION MEASURES

The following mitigation measures are recommended by the Botanical Impact Assessment:

- All construction must be done in accordance with an approved construction and operational phase Environmental Management Plan (EMP), which must include the recommendations made in this report.
- A suitably qualified Environmental Control Officer must be appointed to monitor the construction phase in terms of the EMP and any other conditions pertaining to specialist studies.
- **Before any work is done** protected tree species must be marked and demarcated.
- **Before any work is done** search & rescue must be implemented / completed.
- Lay-down areas or construction sites must be located within the construction footprint.
- No clearing of any area outside of the construction footprint may be allowed.
- All waste that had been illegally dumped within the footprint must be removed to a Municipal approved waste disposal site.
- An integrated waste management approach must be implemented during construction.
 - Construction related general and hazardous waste may only be disposed of at Municipal approved waste disposal sites.
- Alien invasive *Prosopis* plants within the footprint (and immediate surroundings) must be removed in a responsible way (to ensure against regrowth).

10.1.4 CONCLUSION

The proposed development footprint is located on Municipal property, adjacent to existing town developments. The activity is expected to result in a permanent transformation of approximately 95 ha of land, of which approximately 60 - 70% is still covered by indigenous vegetation in good condition. The site overlaps an identified critical biodiversity area (according to the 2016, Northern Cape Critical Biodiversity Areas maps). In addition, fourteen (14) protected Sheppard trees (*Boscia albitrunca*), and a number of Northern Cape Nature Conservation Act, protected species were observed within the footprint.

According to the impact assessment given in **Error! Reference source not found.** the development is likely to result in a relative Medium-Low impact, which can be reduced to a Low impact with good environmental control during construction.

With the correct mitigation it is unlikely that the development will contribute significantly to any of the following:

- 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.
- Loss of ecosystem connectivity.

As per the Botanical Specialist, "with the available information, it is recommended that project be approved, with the proposed mitigation actions."

10.2 HERITAGE IMPACT ASSESSMENT

Jan Engelbrecht of the Ubique Heritage Consultants was appointed to undertake a Heritage Impact Assessment (HIA) of the proposed site. The HIA is included as **Appendix 6B**.

10.2.1 KEY FINDINGS

According to the Heritage Impact Assessment (**Appendix 6B**);

1. No significant heritage sites or features were identified within the proposed site for development. Ten incidences of ESA/MSA/LSA lithic material and low-fired indigenous ceramics were recorded across the development footprint. These identified cultural material is not conservation worthy but was recorded.
2. The neglected graveyard situated within the development footprint is in a terrible state of preservation.
3. The Groblershoop cemetery is situated well outside the development footprint. This site is graded as IIIB and is of High Local Significance.
4. Due to the low palaeontological significance of the area, no further palaeontological heritage studies, ground-truthing and/or specialist mitigation are required. It is considered that the development of the proposed development is deemed appropriate and feasible and will not lead to detrimental impacts on the palaeontological resources of the area (Butler 2020).
5. In conclusion, from a heritage perspective, the Heritage Specialists recommended that the proposed development could continue.

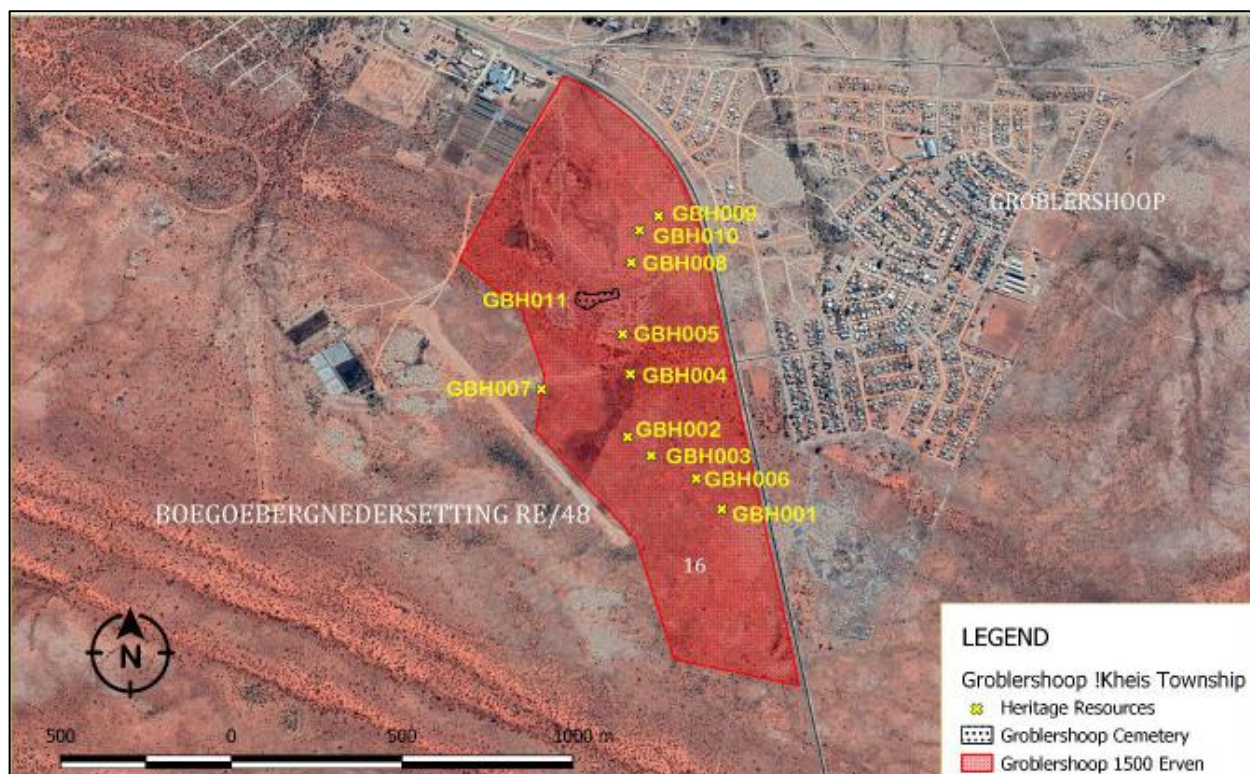


Figure 30: Recorded heritage within the proposed site for the Groblershoop Housing Development. Source: Figure 9 of the Heritage Impact Assessment - Appendix 6B, Ubique Heritage Consultants. GBH011 represents graveyards present within the proposed development footprint at: 28° 54' 29.56"S; 21° 59' 41.24" E

10.2.2 IMPACT ASSESSMENT

According to the Heritage Impact Assessment (**Appendix 6B**),

1. The Early/Middle/Late Stone Age cultural material identified is not conservation worth;
2. This site is graded as IIIB and is of High Local Significance.
3. This site is graded as IIIB and is of High Local Significance.
4. The site has a low palaeontological significance

Therefore, the impact on Archaeological and Historical resources is considered to be Low as no significant heritage sites or features were identified within the surveyed sections of the proposed Groblershoop township expansion,

The probability of the development impacting on palaeontological heritage during the construction phase is regarded as minimal, and the significance of the impact occurring, low. Due to the low palaeontological significance of the area, no further palaeontological heritage studies, ground-truthing and/or specialist mitigation are required. It is considered that the development of the proposed development is deemed appropriate and feasible and will not lead to detrimental impacts on the palaeontological resources of the area.

10.2.3 MITIGATION MEASURES

According to the Heritage Impact Assessment (**Appendix 6B**), based on the assessment of the potential impact of the development on the identified heritage, the following recommendations are made, taking into consideration any existing or potential sustainable social and economic benefits:

1. No further mitigation is recommended with regards to these resources. Therefore, from a heritage point of view, we recommend that the proposed development can continue.
2. It is recommended that the graves be fenced off with the inclusion of a 50 m buffer/safety zone. An attempt should be made to clear the area of the building rubble and rubbish, as well as restore the graves. It is recommended that the graves be fenced off with the inclusion of a 50 m buffer/safety zone. This site is graded as IIIB and is of High Local Significance.
3. No further mitigation is recommended with regards to the presence of the Groblershoop Cemetery outside the proposed development footprint.
4. No further palaeontological heritage studies, ground-truthing and/or specialist mitigation are required. However, if fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the Chance Find Protocol (Appendix A/11) must be implemented by the Environmental Control Officer (ECO) in charge of these developments. These discoveries ought to be protected, and the ECO must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation can be carried out by a palaeontologist (Butler 2020).
5. Although all possible care has been taken to identify sites of cultural importance during the investigation of study areas, it is always possible that hidden or sub-surface sites could be overlooked during the assessment. If during construction, any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage

resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contacted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA. UBIQUE Heritage Consultants and its personnel will not be held liable for such oversights or costs incurred as a result of such oversights.

10.2.4 CONCLUSION

As per the Heritage Impact Assessment (**Appendix 6B**), This HIA has identified no significant heritage resources that will be impacted negatively by the proposed development. The graveyard situated within the development footprint may be affected negatively, but the effects may be mitigated with a buffer or safety zone around the perimeter. The proposed expansion of the Groblershoop Township, may continue, provided the recommendations stipulated within this report, and the subsequent decision by SAHRA, are followed.

10.3 FRESHWATER ASSESSMENT

Dr Dirk van Driel (Watsan Africa) was appointed to undertake the Freshwater Assessment for the proposed development. The Freshwater Impact Assessment is included as **Appendix 6C**.

10.3.1 KEY FINDINGS

According to the Freshwater Assessment (**Appendix 6C**), the only aquatic feature which occur within the northern corner study area. The drainage line is approximately 700m long and ends against the vineyards along the Orange River. Much of its existence probably depends on runoff from the N10 trunk road. a prominent tree line on the site that resembles that of a drainage line. This is entirely artificial, as it is the result of raw sewage being dumped from tanker trucks on the site and on its flow path down the incline has created the conditions for the trees to establish themselves. This tree line starts as abruptly as it ends and is not connected to any other drainage line. The urban solid waste and building rubble can be construed as a threat to the aquatic environment, should it end up in the drainage lines, irrigation canals and in the Orange River. There is a drainage line with its tree line further south, alongside the red dunes. This drainage line is outside the area earmarked for development, but is of concern because it is possible, perhaps not unthinkable, given the current circumstances, that rubble and sewage from the urban area can end up there in the future.

The Freshwater Specialist classified the drainage line, present within the site footprint, as having a small economic footprint. If this drainage line is lost because of development, it will not represent a mentionable loss in environmental goods and services. Urban wastewater is of importance because untreated waste ends up in water ways, raw sewage is dumped in drainage lines. Likewise, several sewage pump stations are dysfunctional, overflowing, with large quantities of raw sewage flowing down drainage lines. Household solid waste is not collected and removed according to standard municipal operating procedures. Large

quantities of waste accumulate in the townships and the streets. Large quantities of waste end up in the drainage lines as well.

The only drainage line of concern is the short one in the northern corner of the proposed development. The one that exists because of the dumping of sewage is not going to be evaluated. Likewise, the one along the N10 to the south of the proposed development is too far away. The flow is heavily modified by the trunk road, the irrigation canal and the vineyards. Runoff is added from the N10 trunk road. Urban waste was present in the drainage line during the site visit. Goats and other domestic animals were regarded as exotic fauna.

The driver of the drainage lines is the occasional flood that follows sudden and intense rainfall events. This is followed by prolonged droughts and intense summer heat that prevents the development of any viable aquatic habitat. This is apart from shallow ground water that explains the growth of a somewhat more prolific vegetation along the drainage lines. The current sewage and solid waste situation are threats to the WULA. The authorities may insist that these issues be resolved before a General Authorization is approved. Apart from this, the findings of this Fresh Water Report indicate that a general Authorization would be in order for the development of an urban housing scheme at Groblershoop.

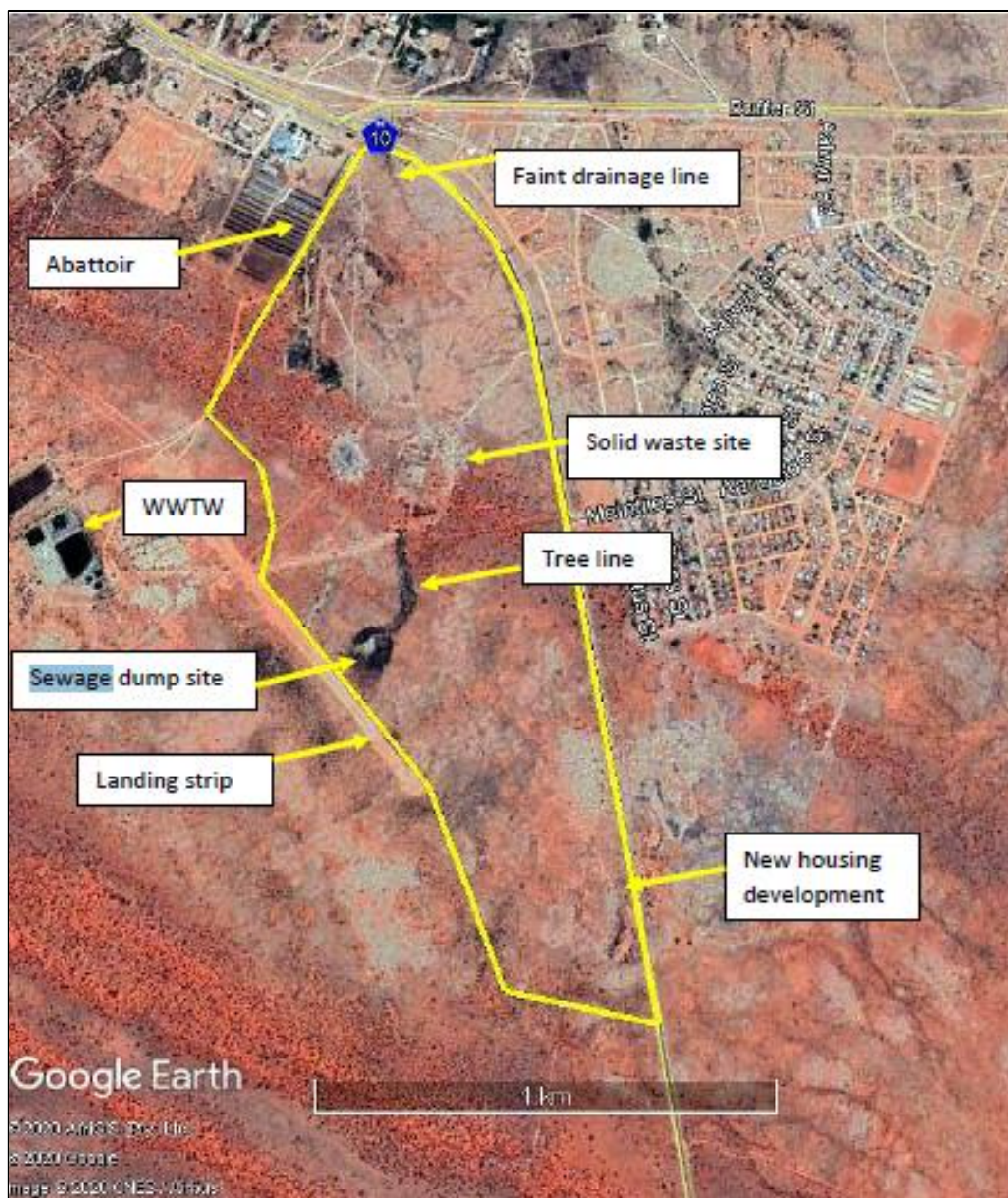


Figure 31. Aquatic features associated with the site. Source: Freshwater Report, Dr van Driel.

Sewage dump site

However, there is a prominent tree line on the site that resembles that of a drainage line. This is entirely artificial, as it is the result of raw sewage being dumped from tanker trucks on the site (Figure 9) and on its flow path down the incline has created the conditions for the trees to establish themselves. This tree line starts as abruptly as it ends and is not connected to any other drainage line. The locality on which the dumping takes place and the flow path is clearly visible. This malpractice must have been going on for years, judging from the height of the trees. Since the tree line is not there because of natural circumstance, it cannot have any conservation status in terms of the requirements of the WULA and Fresh Water Report. Meanwhile the WWTW is lying idle. Initially it was used but judging from the vegetation growth in the intake

structure, it must have been idle for some time now. The ponds are partly filled to entirely empty and overgrown with reeds. The WWTW and concomitant infrastructure was constructed at great cost.

10.3.2 IMPACT ASSESSMENT

As per the Freshwater Assessment (Figure 6C), the drainage line passes in the northern section of the proposed site for development however, this drainage line is small, almost insignificant. The catchment area is small. Houses and streets will probably be built right through it, without concern for creating a storm water conduit. Likewise, the proposed impact of this development on the Orange River is insignificant. However, the cumulative impact of all developments along the Orange River in the !Kheis municipality can be substantial. Moreover, cumulative impact of sewage and solid waste ending up in the drainage line and Orange River.

The Ecological Importance (EI) is based on the presence of especially fish species that are endangered on a local, regional or national level. There are no fish in the drainage line, as there is no permanent water. According to this assessment, which is prescribed for WULA's, the drainage line is not important. Both the instream and riparian habitat score a "C", with the loss of ecological functioning, but with some of it still intact. Importantly, the proposed development at Groblershoop is unlikely to alter the PES of the Orange River at Grootdrink. The question arises, according to the ES definition, if the drainage lines would recover to its original ecological state prior to any human impact. If the roads and vineyards, along with the rubble and trash be removed, would the drainage line recover? The answer is probably yes, even though the drainage lines would find new routes and even though it would take many decades, perhaps more than a century, in this semiarid region where re-growth of vegetation can take a long time. However, this is not a realistic scenario. Development is here to stay, together with its impacts. From this point of view the drainage line can be considered as ecologically sensitive.

10.3.3 MITIGATION MEASURES

According to the Freshwater Report, no mitigation measures are proposed where the loss of the drainage line is of little significance. The significant combined impact of the various developments stem from the sewage and waste issues must be addressed. Adequate municipal services should resume.

10.3.4 CONCLUSION

As per the Freshwater Assessment (**Appendix 6C**), an anthropogenic activity can impact on any of the ecosystem drivers or responses and this can have a knock-on effect on all of the other drivers and responses. This, in turn, will predictably impact on the ecosystem services. The WULA and the EIA must provide mitigation measured for these impacts. The driver of the drainage lines is the occasional flood that follows sudden and intense rainfall events. This is followed by prolonged droughts and intense summer heat that prevents the development of any viable aquatic habitat. This is apart from shallow ground water that explains the growth of a somewhat more prolific vegetation along the drainage lines. The current sewage and solid waste situation are threats to the WULA. The authorities may insist that these issues be resolved before a General Authorization is approved.

10.4 GEO-TECHNICAL ASSESSMENT

Cedarland Geotechnical Consult (Pty) Ltd was appointed to undertake the Geo-technical Assessment as part of the EIA process, and is included as **Appendix 6D**.

10.4.1 KEY FINDINGS

According to the Geo-technical Assessment, the proposed site for development was regarded as being of intermediate suitability for the proposed residential development where founding conditions were designated as R, S, S1, and S2. The following are the main conclusions that have been made:

- Geology:

The site for the proposed development is located between the lithology of the Kaapvaal Craton and Namaqua-Natal mobile belt where the remaining, original geology is comprised of Kaaieen Terrane whereas the site is located on the Groblershoop Formation of the Brulpan Group. The bedrock associated with the site comprises of lineal bands of micaceous quartzite associated with quartz-amphibole schist of the Groblershoop Formation, Brulpan Group.

- Soil Profile:

The soil profile of the site is comprised of Gorgonia Formation (aeolian sand associated with the Gorgonia Formation of the Kalahari Group where the depth of the horizon ranged from 800 – 1900mm), colluvium (gravely colluvium as surface deposits were noted throughout the site which comprised of a homogenous material consisting of fine sand, gravels, cobbles of quartz and some calcrete. Gravel colluvium had a medium dense consistency and the soil matrix was intact and the depth of the horizon was between 600 – 1400mm thick), Mokalanen Formation (dominant lithic material present in a continuous cover over the quartzite and schist. Calcrete was present as very dense hardpan or boulder calcrete which occurred at depths between 0 – 800mm and extending to 100 – 1200mm – at which the stage of refusal of excavation occurred), and residual Quartzite (residual quartzite occurred as surface material or underlying the gravely colluvium where the depth of the horizon was 700mm. Medium dense soil matrix).

- Hydrology:

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%.

- Geotechnical Classification:

The site is divided into seven separate geotechnical zones. An additional zoning map was supplied indicating other problems encountered on site that are not necessarily of a geotechnical origin.

Geotechnical Zone I(a)

Zone classed as R (founding is stable and expected soil movement is negligible) comprises 28% of the total site. Slope across the site is less than 2%. Two foundation design alternatives are applicable, namely (i) conventional strip foundations or (ii) slab-on-the-ground foundations, to be placed directly on bedrock or very dense pedocrete.

Geotechnical Zone I(b)

Zone classed as R (founding is stable and expected soil movement is negligible) comprises 36% of the total site. Slope across the site is approximately 2-6%. Use of slab-on-the-ground foundations will require additional construction of an engineered fill or cutting to establish a level platform required for construction. The more viable alternative is therefore conventional strip foundations.

Geotechnical Zone II(a)

Zone classed as S (founding is stable and less than 10mm rapid compression settlement is expected) comprises 3% of the total site. Slope across the site is less than 2%. Two foundation design alternatives are applicable, namely (i) conventional strip foundations or (ii) slab-on-the-ground foundations, to be placed directly on the gravel colluvium or aeolian sand. The slab-on-the-ground alternative was considered the better alternative by the Geotechnical Engineer.

Geotechnical Zone II(b)

Zone classed as S (horizon for founding is slightly compressible and rapid compression settlement less than 10mm is expected) comprises 17% of the total site. Slope across the site is approximately 2 – 6%. Two foundation design alternatives are applicable, namely (i) conventional strip foundations or (ii) slab-on-the-ground foundations, to be placed directly on the gravel colluvium or aeolian sand. The conventional strip foundations alternative was considered the better alternative by the Geotechnical Engineer.

Geotechnical Zone III(a)

Zone classed as S1 (horizon for founding is fairly compressible and the construction method needs to incorporate mitigation measures to counter the effects of these geotechnical conditions where 10 – 20mm rapid compression settlement is expected) comprises 3% of the total site. Slope across the site is less than 2%. Two foundation design alternatives are applicable, namely (i) reinforced strip foundations or (ii) replacement of the *in situ* soils underneath the individual footings. Both alternatives were considered feasible options by the Geotechnical Engineer.

Geotechnical Zone III(b)

Zone classed as S1 (horizon for founding is fairly compressible and the construction method needs to incorporate mitigation measures to counter the effects of these geotechnical conditions where 10 – 20mm rapid compression settlement is expected) comprises 7% of the total site. Slope across the site is approximately 2 - 6%. According to these intermediate geotechnical conditions, two foundation design alternatives are applicable, namely (i) reinforced strip foundations or (ii) replacement of the *in situ* soils underneath the individual footings. Both alternatives were considered as suitable options by the Geotechnical Engineer.

Geotechnical Zone IV

Zone classed as S2 (horizon for founding is highly compressible and the construction method needs to incorporate mitigation measures to counter the effects of these geotechnical conditions where more than 20mm rapid compression settlement is expected) comprises 6% of the total site. Slope across the site is approximately 2 - 6%. According to these intermediate geotechnical conditions, two foundation design alternatives are applicable, namely (i) reinforced strip foundations or (ii) reinforced concrete rafts. Although both alternatives were considered suitable options, the Geotechnical Engineer stated that the selection of a founding option must be made individually for each stand where all of the foundations must be designed by a suitably qualified engineer.

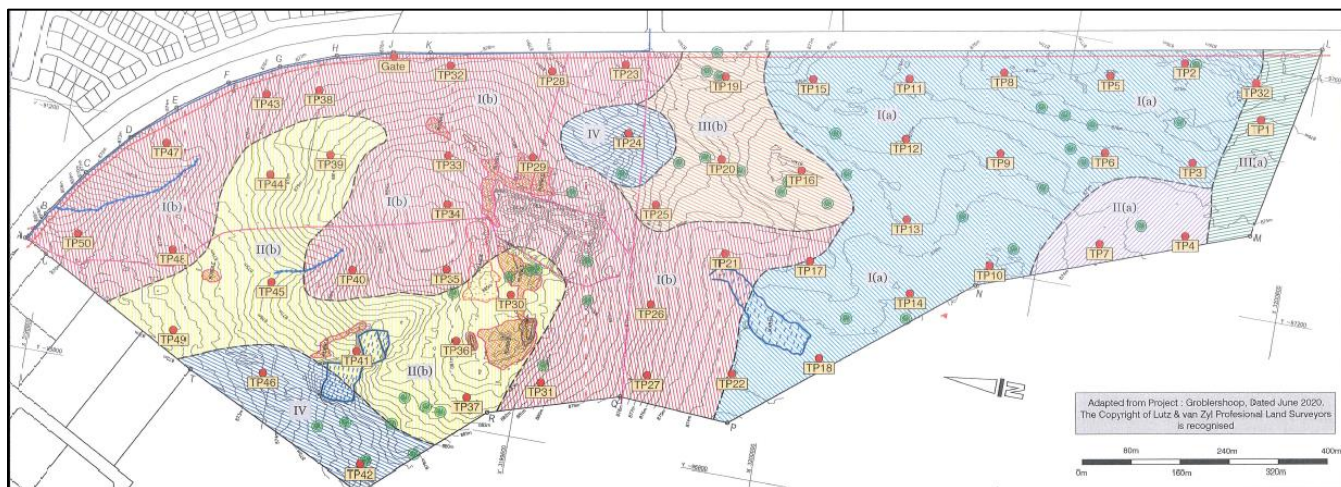


Figure 32. Geotechnical characteristics associated with the proposed site for development. Source: Geotechnical Investigation (Appendix 6D).

- Undermining:

Area is not subject to undermining.

- Soil Corrosivity:

All soil materials can be considered corrosive due to high soluble salt concentrations whereas *in situ* soils and pedocretes are not corrosive due to acidic properties.

- Seismicity:

A low risk for the development of earth tremors therefore exists due to the peak ground acceleration expected in 50 years is 0.05g.

10.4.2 RECOMMENDATIONS

According to the Geo-technical Assessment, the following recommendations are given per geotechnical zone (**Appendix 6D, page 49**). According to the Geo-technical Assessment, the following recommendations are given per geotechnical zone (**Appendix 6D, page 30**). As the geotechnical site conditions favours the use of two foundation design alternatives, the selection of a particular foundation design must be based on practical and financial considerations. Service trenches must not be excavated parallel to buildings within 1500mm of the building perimeter.

Geotechnical Zone I(a)

- Should Strip foundations be used, foundations of 400mm wide must be placed directly on the very dense hardpan calcrete. Walls may consist of thickened floor slabs in areas where proposed dwellings do not exceed 200m² foundations for internal non-loadbearing walls. Should strip foundations be used, floor slabs must be reinforced with steel mesh.
- The Slab-on-the-ground is preferred method of founding. Edge beams must be placed directly on the hardpan calcrete. Foundations for internal non-loadbearing walls must consist of thickened floor slabs. Foundations must not contain any changes in surface levels with steps exceeding 400mm and do not support chimneys or walls which support concrete roofs.

Geotechnical Zone I(b)

- Strip foundations are the preferred founding option which includes foundations of 400mm wide being placed directly on the very dense hardpan calcrete. Walls may consist of thickened floor slabs in areas where proposed dwellings do not exceed 200m² foundations for internal load-bearing walls. Should strip foundations be used, floor slabs must be reinforced with steel mesh.
- This is not the preferred option due to the land slope. The Slab-on-the-ground foundations will require additional work which comprises of the construction of engineered fill or cutting to establish a level platform for construction and will thus, incur additional costs.

Geotechnical Zone II(a)

- Strip foundations of 400mm wide must be placed directly on the very dense hardpan calcrete or on medium dense *in situ* soil can be used. Walls may consist of thickened floor slabs in areas where proposed dwellings do not exceed 200m² foundations for internal non-loadbearing walls. Should strip foundations be used, floor slabs must be reinforced with steel mesh.
- The Slab-on-the ground is preferred method of founding. Edge beams must be placed directly on the hardpan calcrete or on medium dense *in situ* soil can be used. Foundations for internal non-loadbearing walls must consist of thickened floor slabs. Foundations must not contain any changes in surface levels with steps exceeding 400mm and do not support chimneys or walls which support concrete roofs.

Geotechnical Zone II(b)

- Strip foundations are the preferred founding method where foundations of 400mm wide must be placed directly on the medium dense *in situ* soil. Walls may consist of thickened floor slabs in areas where proposed dwellings do not exceed 200m² foundations for internal non-loadbearing walls. Should strip foundations be used, floor slabs must be reinforced with steel mesh.
- The slab-on-the-ground founding method can only be used for dwellings less than 200m² in area. Edge beams must be placed directly on the medium dense *in situ* soil, very dense calcrete or bedrock. Foundations for internal non-loadbearing walls must consist of thickened floor slabs. Foundations must not contain any changes in surface levels with steps exceeding 400mm and do not support chimneys or walls which support concrete roofs.

Geotechnical Zone III(a)

- Reinforced strip foundations will require foundations of 400mm wide placed within the aeolian sand. Sand must be compacted prior to casting of the foundations. Foundations must be steel reinforced and articulation joints at internal and external doors with light reinforcement in the masonry. Site drainage, wet services and plumbing precautions must be provided to prevent leaks. Foundations pressures must be limited to 50kPa.
- *In situ* soils, below a depth of 1.5 times the foundation width or to a suitable soil horizon and replace with granular material (which must be compacted to 93% MOD AASHTO density at - 1% to +2% of optimum moisture content. Normal construction of the superstructure can take place with lightly reinforced strip foundations and light reinforcement in the masonry.

Geotechnical Zone III(b)

- Reinforced strip foundations will require foundations of 400mm wide placed within the aeolian sand. Sand must be compacted prior to casting of the foundations. Foundations must be steel reinforced and articulation joints at internal and external doors with light reinforcement in the

masonry. Site drainage, wet services and plumbing precautions must be provided to prevent leaks. Foundations pressures must be limited to 50kPa.

- *In situ* soils, below a depth of 1.5 times the foundation width or to a suitable soil horizon and replace with granular material (which must be compacted to 93% MOD AASHTO density at -1% to +2% of optimum moisture content. Normal construction of the superstructure can take place with lightly reinforced strip foundations and light reinforcement in the masonry.

Geotechnical Zone IV

- Due to the geotechnical conditions within this zone (namely loose consistency of aeolian deposits, collapse of excavation sidewalls will result in difficult excavating conditions), reinforced raft is considered the better option by the Geotechnical Engineer. Additional groundworks will be required due to the slope of the land. The remobilization of dunes must be considered, especially if vegetation is removed. Therefore, the Geotechnical Engineer recommended that conditions at each site be considered independently and that all foundations be designed by a professional engineer to suit the conditions. Site drainage, wet services and plumbing precautions must be provided to prevent leaks. Foundations pressures must be limited to 50kPa. Reinforced strip foundations must be steel reinforced and articulation joints at internal and external doors whereas masonry must be lightly reinforced. Foundation pressures must be limited to less than 50kPa.
- Reinforced concrete rafts must be founded on reinforced concrete rafts. The raft may be placed on an engineered fill to reduce excavating into the loose sand present within the zone.

According to the Geotechnical Investigation, the non-perennial watercourses require no precautionary measures to ensure safety of the community against flooding. Infrastructure must be established at a safe distance from the drainage lines.

Concerns were raised by the Engineer over potential soil and water contamination (due to cemetery, obsolete oxidation dams, existing oxidation dams, and sewage dumping area) on site which need to be resolved prior to residential development. Although the relative absence of groundwater close to the surface, along with the impermeable barrier formed by calcrete and bedrock), it is unlikely that groundwater contamination may have taken place however, surface water (as well as soil contamination with bacteria) may have been contaminated. Should sewage dumping, present on site, be stopped, the site could be rehabilitated and the entire area can be developed accordingly. It was recommended that facilities be upgraded and residential developments must be maintained as per legal requirements and comply with recommendations stipulated in the Geotechnical Investigation.

In terms of general measures, the following recommendations were made:

- **Founding:** The development must take place according to the SANS 10400H and NHBRC Home Owner's Manual Guidelines (published in 2015).
- **Trench backfill:** only aeolian sand can be regarded as suitable for selected fill or pipe bedding whereas all material (except for hardpan calcrete) can be used for normal backfill.
- **Layer works:** Hardpan calcrete and colluvium are of G6 quality and are suitable for the construction of layer works up to sub- and base- course level for lightly trafficked roads.
- **Wearing course for gravel roads:** no material present on site are 100% suitable for gravel wearing course.
- **Excavation conditions:** Due to the consistency and composition of the soil present on site, the use of such soil is not economically viable. Excavation of soils would require a TLB (rated at 55kW minimum) or a 30 ton excavator will be required for the excavation of the very dense hardpan calcrete which needs to be removed and thus, adequate financial provision must be made for hard

rock excavation. Sidewalls of excavations may be susceptible to collapse. Precautionary measures must be provided to protect workmen in these excavations - these measures may include shoring the excavations or sloping the sides to flatter than 1(V):2(H).

- **Land slope:** Average slope across 66% of the site is between 2 – 6% which is considered favourable for urban development whereas the remaining 34% (with a slope of less than 2%) will require design considerations due to potential reduced flow rates of liquids within these areas.
- **Presence of Cemetery Site and Waste Water Facilities:** future development must comply with legal requirements to mitigate negative impact of these facilities on the receiving environment and proposed residential development.
- **Dune stability:** the very loose sand present in certain zones of the site will make residential development difficult and thus, careful consideration must be given to placement of houses in such areas and to ensure that impact on the receiving environment is minimized. Vegetation must be re-established to ensure that the dunes remain stable.

7. SUMMARY OF IMPACTS

Please refer to Appendix 7 for a summary of the project impact assessment and significance, including a summary of mitigation measures.

Table 5 is a summary of all the impacts assessed in the specialists reports that are associated with the construction and operational phase for the preferred alternative.

Table 7. Summary of all impacts

Study	Impact	Significance No Mitigation	Significance With Mitigation
Botanical	Geology & soils: Potential impact on special habitats	Insignificant (Negative impact)	Insignificant (Negative impact)
	Land-use and cover: Potential impact on socio-economic activities.	Low (Negative impact)	Insignificant (Negative impact)
	Vegetation status: Loss of vulnerable or endangered vegetation and associated habitat.	Low (Negative impact)	Insignificant (Negative impact)
	Conservation priority: Potential impact on protected areas, CBA's, ESA's or Centre's of Endemism.	Medium (Negative impact)	Low (Negative impact)
	Connectivity: Potential loss of ecological migration corridors.	Low (Negative impact)	Insignificant (Negative impact)
	Protected & endangered plant species: Potential impact on threatened or protected plant species.	Medium (Negative impact)	Insignificant (Negative impact)
	Invasive alien plant species: Potential invasive plant infestation as a result of the activities.	Medium (Negative impact)	Insignificant (Negative impact)
	Veld fire risk: Potential risk of veld fires as a result of the activities.	Insignificant (Negative impact)	Insignificant (Negative impact)
	Cumulative impacts: Cumulative impact associated with proposed activity.	Medium (Negative impact)	Insignificant (Negative impact)
	The "No-Go" option: Potential impact associated with the No-Go alternative.	Medium (Negative impact)	N/A
Heritage	No significant heritage sites or features were identified within the proposed site for development. Ten incidences of	Low (No mitigation required)	

	ESA/MSA/LSA lithic material and low-fired indigenous ceramics were recorded across the development footprint.		
	Graves present within footprint (28°54'29.56"S; 21°59'41.24"E)	High / Medium (Negative impact)	Low (negative impact)
	The formal Groblershoop town cemetery, situated outside of the development footprint.	Low (No mitigation required)	
Palaeontology	Due to the low palaeontological significance of the area, no further palaeontological heritage studies, ground-truthing and/or specialist mitigation are required.	N/A	N/A
Freshwater	Cumulative impact of sewage and solid waste ending up in the drainage line and Orange River	Medium (Negative impact)	Low (Negative impact)
	Urban solid waste: waste ending up in the river and polluting these rivers.	Medium (Negative impact)	Low (Negative impact)
Socio-economic	Job Creation – Construction phase	Medium (Positive impact)	
Visual	Potential visual impact on the area	Low (Negative impact)	Low (Negative impact)
Dust	Potential impact of dust from construction activities	Low (Positive impact)	Low (Positive impact)

8. RECOMMENDATIONS

The following mitigation measures must be enforced if the proposed development were approved. These are also included in the Environmental Management Programme (**Appendix 9**).

Construction Phase:

According to the Botanical Assessment (**Appendix 6A**), the following mitigation actions are recommended:

- All construction must be done in accordance with an approved construction and operational phase Environmental Management Plan (EMP), which must include the recommendations made in this report.
- A suitably qualified Environmental Control Officer must be appointed to monitor the construction phase in terms of the EMP and any other conditions pertaining to specialist studies.
- **Before any work is done** protected tree species must be marked and demarcated;
- **Before any work is done** search & rescue as discussed in Table 3 must be completed.
- Lay-down areas or construction sites must be located within the construction footprint.
- No clearing of any area outside of the construction footprint may be allowed.
- All waste that had been illegally dumped within the footprint must be removed to a Municipal approved waste disposal site.
- An integrated waste management approach must be implemented during construction.
- Construction related general and hazardous waste may only be disposed of at Municipal approved waste disposal sites.
- Alien invasive *Prosopis* plants within the footprint (and immediate surroundings) must be removed in a responsible way (to ensure against regrowth).

According to the Heritage Impact Assessment (**Appendix 6B**), based on the assessment of the potential impact of the development on the identified heritage, the following recommendations are made, taking into consideration any existing or potential sustainable social and economic benefits:

1. No significant heritage sites or features were identified within the surveyed sections of the new Groblershoop township, Portion 16 of the Farm Boegoebergnedersetting RE/48. The Early/Middle/Late Stone Age cultural material identified is not conservation worthy. No further mitigation is recommended with regards to these resources. Therefore, from a heritage point of view, we recommend that the proposed development can continue.
2. The defunct graveyard situated within the development footprint is in a terrible state of preservation. An attempt should be made to clear the area of the building rubble and rubbish, as well as restore the graves. It is recommended that the graves be fenced off with the inclusion of a 50 m buffer/safety zone. This site is graded as IIIB and is of High Local Significance.
3. The Groblershoop cemetery is situated well outside the development footprint. This site is graded as IIIB and is of High Local Significance. No further mitigation is recommended with regards to these resources.
4. Due to the low palaeontological significance of the area, no further palaeontological heritage studies, ground-truthing and/or specialist mitigation are required. It is considered that the development of the proposed development is deemed appropriate and feasible and will not lead to detrimental impacts on the palaeontological resources of the area (Butler 2020). If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the Chance Find Protocol (Appendix A/11) must be implemented by the Environmental Control Officer (ECO) in charge of these developments. These discoveries ought to be protected, and the ECO must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation can be carried out by a palaeontologist (Butler 2020).
5. Although all possible care has been taken to identify sites of cultural importance during the investigation of study areas, it is always possible that hidden or sub-surface sites could be

overlooked during the assessment. If during construction, any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contacted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA. UBIQUE Heritage Consultants and its personnel will not be held liable for such oversights or costs incurred as a result of such oversights.

As per the Freshwater Impact Assessment (**Appendix 6C**), no mitigation measures are proposed where the loss of the drainage line is of little significance. The significant combined impact of the various developments stem from the sewage and waste issues must be addressed. Adequate municipal services should resume. Anthropogenic activities impact ecosystem drivers or responses and this can have a knock-on effect on all of the other drivers and responses. This, in turn, will predictably impact on the ecosystem services. The WULA and the EIA must provide mitigation measured for these impacts. The driver of the drainage lines is the occasional flood that follows sudden and intense rainfall events. This is followed by prolonged droughts and intense summer heat that prevents the development of any viable aquatic habitat. This is apart from shallow ground water that explains the growth of a somewhat more prolific vegetation along the drainage lines. The current sewage and solid waste situation are threats to the WULA. The authorities may insist that these issues be resolved before a General Authorization is approved.

As per the Geotechnical Investigation Report (**Appendix 6D**) the following recommendations were made:

- **Founding:** The development must take place according to the SANS 10400H and NHBRC Home Owner's Manual Guidelines (published in 2015).
- **Trench backfill:** only aeolian sand can be regarded as suitable for selected fill or pipe bedding whereas all material (except for hardpan calcrete) can be used for normal backfill.
- **Layer works:** Hardpan calcrete and colluvium are of G6 quality and are suitable for the construction of layer works up to sub- and base- course level for lightly trafficked roads.
- **Wearing course for gravel roads:** no material present on site are 100% suitable for gravel wearing course.
- **Excavation conditions:** Due to the consistency and composition of the soil present on site, the use of such soil is not economically viable. Excavation of soils would require a TLB (rated at 55kW minimum) or a 30 ton excavator will be required for the excavation of the very dense hardpan calcrete which needs to be removed and thus, adequate financial provision must be made for hard rock excavation. Sidewalls of excavations may be susceptible to collapse. Precautionary measures must be provided to protect workmen in these excavations - these measures may include shoring the excavations or sloping the sides to flatter than 1(V):2(H).
- **Land slope:** Average slope across 66% of the site is between 2 – 6% which is considered favourable for urban development whereas the remaining 34% (with a slope of less than 2%) will require design considerations due to potential reduced flow rates of liquids within these areas.
- **Presence of Cemetery Site and Wastewater Facilities:** future development must comply with legal requirements to mitigate negative impact of these facilities on the receiving environment and proposed residential development.
- **Dune stability:** the very loose sand present in certain zones of the site will make residential development difficult and thus, careful consideration must be given to placement of houses in such areas and to ensure that impact on the receiving environment is minimized. Vegetation must be re-established to ensure that the dunes remain stable.

Operational Phase:

According to the Freshwater Assessment, the lack of functional wastewater treatment works and illegal dumping remains a cause of concern. Raw sewage is dumped in drainage lines. Likewise, several sewage pump stations are dysfunctional, overflowing, with large quantities of raw sewage flowing down drainage lines. Household solid waste is not collected and removed according to standard municipal operating procedures. Very large quantities of waste accumulate in the townships and the streets. Large quantities of waste end up in the drainage lines as well. These two aspects are crucial to the WULA and environmental authorisation of any further urban development. If these malpractices are allowed to continue and if the normal municipal services continue to be absent, this untenable situation will become worse when these townships expand. Therefore, a proper municipal waste management system is necessary

9. CONCLUSIONS

The specialist studies and the information provided within the EIA Report, indicates that the proposed Groblershoop Housing development does not pose any significant impacts should the proposed mitigation measures be implemented. However, as per the specialist assessments, site visits, and comments received from registered I&APs, the failure of the wastewater treatment works and illegal dumping remain a key issue which must be addressed with the implementation of a proper waste management plan. It must be noted that existing water-supply and sewage services do not adequately address / service the existing demand of the Groblershoop Settlement. Consequently, the proposed project will increase the pressure placed on existing municipal services and therefore, if a waste management plan is not effectively implemented, the current lack of sewage and solid waste management may negatively impact the environment and socioeconomic development in the Groblershoop area.

The following specialist studies were undertaken as part of this Environmental Impact Assessment:

- Botanical Impact Assessment (**Appendix 6A**)
- Heritage Impact Assessment (**Appendix 6B**)
- Freshwater Assessment (**Appendix 6C**)
- Geo-technical Assessment (**Appendix 6D**)

According to the Botanical Specialist (Appendix 6A), “ *with the available information it is recommended that project be approved, with the proposed mitigation actions*”. According to the Heritage Impact Assessment (Appendix 6B), no significant heritage sites or features were identified within the proposed development footprint however, a graveyard (graded as IIIB and of High Local Significance) is present within the proposed site for development. The graveyard must be fenced off with the inclusion of a 50 m buffer/safety zone. The Heritage Specialists recommended that the proposed development could continue due to the absence of any heritage resources of conservational significance. The proposed site for development is located within an area of low palaeontological significance. Thus, no further palaeontological heritage studies, ground-truthing, and/or specialist mitigation are required. As per the Freshwater Impact Assessment (Appendix 6C), the Freshwater Specialist concluded that identified impacts will have a High / Medium impact on the aquatic features within the proposed site for development however, these impacts can be reduced to a Low impact should proposed mitigation measures be implemented. Impacts associated with the condition of the sewage and solid waste management infrastructure have been identified as impacts which need to be addressed with the implementation of a proper waste management plan. This may including implementing recommendations detailed in the Engineer’s Services Report (Appendix 4B). According to the Geo-technical Assessment (Appendix 6D), the proposed site for development was regarded as being of intermediate suitability for the proposed residential development where founding conditions were designated as R, S, S1, and S2.

In terms of the need and desirability of the proposed residential development, housing is a national need, including in the !Kheis Local Municipality. The proposed development represents a significant step towards service delivery and housing objectives within the municipality and broader area. The development will not only meet the pressing needs of adequate housing within the municipality but will also be in line to support of the municipal IDP and SDF objectives, namely to provide housing for the poor and decrease the Municipality’s housing backlog as well as fulfil the Constitutional mandate to provide adequate housing and basic services to citizens.

In terms of alternatives, **Alternative 4** is the preferred alternative. This alternative is considered a viable option and is also the Municipality’s preferred layout since it provides the optimal number of erven and

housing opportunities (high and lower density), as well as providing for Municipal and Government land use opportunities, and more Open Space, and incorporates the environmental sensitive areas associated with the site. There are no environmental or heritage limitations to this layout. The proposed location is considered to be a viable option. The proposed site is adjacent to the existing residential area of Groblershoop, allowing accessibility and linking to the existing and future services infrastructure. The surrounding land use, namely the existing Groblershoop settlement, is in line with the proposed development, which is part of the reasons why this location was selected by the local authority for the purposes of this project. The site is located along the N10 and therefore can be accessed using the existing road networks in the area. There are no physical characteristics of these properties or environmental constraints which would exclude the site from development. However, as per the Botanical Assessment, numerous nationally and provincially protected plant species are present within the development footprint. Prior to any of these protected plant species being disturbed, damaged, removed, relocated, or destroyed, a permit from the relevant authority is required and must be applied for.

The “no-go” option, which is the option of not developing the proposed housing development. Currently, the area earmarked for development is disturbed, with numerous cases of illegal dumping and raw sewage spillage. Although the no-go development might result in no potential negative environmental impacts, especially on the clearance of vegetation on the development site, the direct and indirect socio-economic benefits of not constructing the residential development will not be realised. The need for additional housing opportunities in the area will not be realised.

Considering all the information, it is envisaged that this proposed Groblershoop Housing Development will have a low negative impact on the environment, and the socio-economic benefits are expected to greatly outweigh any negative impacts, should the mitigation measures as recommended by the various specialists and detailed in Section 9 and the Environmental Management Programme (Appendix 9) be implemented. It must be noted that a proper waste management plan, addressing the functioning of the wastewater treatment works and solid waste removal, as well as a Traffic Impact Assessment (TIA), must be added as conditions to the granting of the environmental authorisation. This waste management plan must be implemented to address the expected increase in pressure on existing services – as per recommendations proposed and addressed in the Engineer’s Services Report (Appendix 4B). In addition to parameters stipulated in the Engineer’s Services Report (Appendix 4B), a Stormwater Management Plan (SWMP) must be designed and compiled to address concerns raised by the I&AP - namely the potential flow of sewage- and/or solid waste-contaminated stormwater runoff from the development into the drainage lines and subsequently the Orange River. Therefore, it is recommended that the proposed development be supported/ authorized subject to the compilation of a SWMP which includes required engineering parameters (Appendix 4B) and the management of potentially sewage- and/or solid waste-contaminated stormwater runoff.

It is therefore recommended that the proposed Boegoeberg Housing Development (**Alternative 4**) **be supported and be authorised with the necessary conditions of approval**, subject to the compilation of a stormwater management plan, waste management plan (addressing sewage and solid waste management), and the undertaking of a traffic impact assessment, along with the implementation of recommendations / mitigation measures proposed by Specialists (Appendices 6A-D) and included in the EMP (Appendix 9).

10. DETAILS AND EXPERTISE OF THE EAP

Details of Environmental Assessment Practitioner, expertise and Curriculum Vitae

This Final Environmental Impact Report was Report compiled by Anthony Mader -

Qualifications:

Anthony Mader: BSc, BSc (Hons), PhD (currently completing) at the University of the Witwatersrand, Johannesburg, South Africa.

Expertise:

Anthony has over three years of experience within environmental consulting and has worked on private and government projects throughout the country, including Western Cape, Northern Cape, KwaZulu-Natal, and the Eastern Cape. Anthony has facilitated Environmental (EA) and Water Use (WUA) applications whereas other duties included auditing of various types of construction types to ensure environmental compliance with the EA. The variety of projects Anthony has worked on include, but are not limited to;

- Housing developments;
- Civil engineering infrastructure projects such as water supply schemes, roads, culverts, bridges, warehouses, and a substation; and
- Auditing of water supply schemes, housing developments, warehouses, roads, bridges, and reservoirs

Anthony Mader joined EnviroAfrica CC in March 2020 and is employed as an Environmental Assessment Practitioner (EAP), working on various private and government projects throughout the Western Cape and Northern Cape.

Employment:

Previous employment as an Environmental Consultant	: EnviroPro Environmental Consultants (2017 – 2020)
Current employment as Environmental Assessment Practitioner	: EnviroAfrica cc (2020 – present).

Report reviewed and supervised by Bernard de Witt – The whole process and report was supervised by Bernard de Witt who has more than 30 years' experience in environmental management and environmental impact assessments. Bernard de Witt: B.Sc. Forestry (Stellenbosch); B.A. (Hons) Public Administration (Stellenbosch); National Diploma in Parks and Recreation Management; EIA Short course (UCT); ISO 14001 Auditors course (SABS)

(-----END-----)