



DARLING SOLAR PV - PRE-APPLICATION DRAFT BAR (February 2024) - DEADP Reference: 16/3/3/6/7/1/F5/5/2230/23

Date	Comment	I&AP	Response	Respondent
Project description				
23 February 2024	The pre-application BAR indicates that the proposed roads will be 5m in width and more than 8m in width. A final description of the proposed roads must be provided in order to determine the relevant listed activity(ies) that may be triggered in this regard.	Kraigen Govindasamy - Department of Environmental Affairs and Development Planning	The proposed roads will be 6m in width. This has been updated in the Draft BAR	EnviroAfrica
	A detailed description of the proposed powerline (including, <i>inter alia</i> , the route and whether aboveground or below ground) to connect the proposed development to the existing substation must be provided.		The engineers confirmed that all cables of the Municipality will be underground and 11kV lines.	CK Rumboll
Public Participation				
23 February 2024	Please be reminded that all proof of having conducted the Public Participation Process in terms of Chapter 6 of the Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) must be supplied to this Department. This includes proof of the placing of the newspaper advertisement, proof of the placing of site notices and proof of the notification and engagement with Interested and Affected Parties and must be included in the BAR.	Kraigen Govindasamy - Department of Environmental Affairs and Development Planning	Noted. Please refer to Appendix F1 - F4 for proof of PPP	EnviroAfrica
	Please be reminded that the Public Participation Process must fulfil the requirements outlined in Chapter 6 of the EIA Regulations, 2014 (as amended), and must take into account any applicable guidelines published in terms of Section 24J of the National Environmental Management Act, 1998 (Act No. 107 of 1998), this Department's Circular EADP 0028/2014 on the "One Environmental Management System" and the EIA Regulations, 2014 (as amended), as well as any other guidance provided by this Department.		Noted. The EAP is of the opinion that all PPP has fulfilled the minimum requirements of the EIA Regulations, 2014 (as amended).	EnviroAfrica
	You are reminded that all comments received on the pre-application BAR must be adequately addressed prior to submission of the BAR to be submitted to the Competent Authority for decision making.		Noted. Please refer to the Comment and response Report (this report)(Appendix F6)	EnviroAfrica
Screening Tool Report				
23 February 2024	Since the Screening Report is dated 04 August 2023, an updated Screening Report will be required along with the submission of the application for environmental authorisation. Please note that the Screening Report must also be signed by the compiler in this regard.	Kraigen Govindasamy - Department of Environmental Affairs and Development Planning	The DFFE Screening Tool Report has been updated (see Appendix I1)	EnviroAfrica
	Should the updated Screening Report differ from the Screening Report dated 04 August 2023, the Site Sensitivity Verification Report will need to be updated accordingly.		The Screening Tool Report has been updated (Appendix I2).	EnviroAfrica
Environmental Management Programme				
23 February 2024	You are reminded that all the specialists' recommendations must be included in the EMPr.	Kraigen Govindasamy - Department of Environmental Affairs and Development Planning	All specialist recommendations are included in Section 1.6 of the EMPr	EnviroAfrica
Visual				
23 February 2024	The Visual Impact Assessment (compiled by New World Associates and dated 21 September 2023) must include the potential glint and glare aspects associated with the proposed panels.	Kraigen Govindasamy - Department of Environmental Affairs and Development Planning	Noted. Glint and glare has been included in the revised VIA, and is included as Appendix G3 in the Draft BAR.	EnviroAfrica
General				

14 February 2024	Darling Green Solar is the holder of an environmental authorisation ("EA") granted to it on 21 February 2023 by the Acting Chief Director: Integrated Environmental Authorisations in the Department of Forestry, Fisheries and the Environment ("DFFE").	Nicholas Smith Attorneys - on behalf of Messrs. Darling Green Utility (Pty) Ltd ("Darling Utility"); Darling Green Solar (Pty) Ltd ("Darling Green Solar"); and Darling Green Estate	Noted.	EnviroAfrica
	Darling Green Solar's EA authorises the NEMA-listed activities described on page 2 thereof, which pertain to the development of our client's approved Darling Green Solar photovoltaic ("Darling Green Solar PV") facility on Remainder Erf 3778 and Remainder Erf 551 Malmesbury.		The Darling Green Estate is primarily proposed to power the envisioned Darling Green Estate and the remaining power will be fed into the Eskom Grid to be sold. Application was made and approved for only 10 MW. The proposal made on Erf 551, Darling, is an provincial driven project and is applied for the sell electricity directly to Swartland Municipality to relief the pressure on Eskom and to enable the Municipality to accommodate their local towns.	CK Rumboll/ Swartland Municipality
	Darling Green Solar's EA, which is valid for 10 years from its date of issue ¹ envisages a solar PV plant of approximately 24 hectares which will generate a projected power peak (electricity) of 19MWp. As such Darling Green Solar's proposed development will occupy less than half the land area proposed for the municipal Darling Solar PV facility for almost exactly the same projected power peak. ² One of the aspects that will need to be traversed in the next and further drafts of the basic assessment report is whether the proposed municipal Darling Solar PV facility comprises the most sustainable use of the Municipality's immovable property. It is unclear why the municipal scheme requires more than double the surface area required for Darling Green Solar's approved solar PV facility.		It is calculated that 1MW renewable power (solar) requires approximately 1,8ha of land. Although only 19,9MW of power is proposed, the application study area is made for ±53,4ha to ensure that the best possible location will be utilised by the identified developer. The entire area will not be utilised for the development, only the most suitable area in terms of environmental aspects.	CK Rumboll/ Swartland Municipality
	As regards the provision of electricity to the national grid when generated by Darling Green Solar's approved solar PV facility, that will be done via the transmission of that electricity to the Darling substation. The Darling substation is situated in close proximity to the proposed municipal Darling Solar PV facility. ³		Noted.	EnviroAfrica
	Darling Green Solar is also the beneficiary of various other statutory approvals that pertain to the approved Darling Green Solar PV facility, including the required consent use issued in terms of the applicable municipal planning by-law ⁴ . The consent use was approved by the Municipal Manager of Swartland Municipality on 6 April 2023 and is valid for 5 years from date of issue. ⁵		Noted.	EnviroAfrica
	On behalf of our client we submit that the Municipality has essentially recognised and given effect to our client's current expectation (both presently entrenched by various unassailable statutory approvals, including municipal land use planning approval and thus legitimate) of access to Darling substation.		Noted.	CK Rumboll/ Swartland Municipality
	To the extent that the Darling substation might not have sufficient capacity to distribute electricity generated both by Darling Green Solar's approved solar PV facility <u>and</u> as proposed by the municipal Darling Solar PV facility, the Municipality will in all reasonable likelihood not be in a position to usurp my client's current (and legally entrenched) position while my client's approvals are and remain valid.		Darling Green Solar only has land use approval for 10MW solar. Swartland Municipality signed a PPA to allow Darling Green Solar to connect to the Swartland substation for only 1 MVA and not 19 MVA as per objection. Darling Green Solar had discussions with Eskom to connect to their substation for a capacity of 5MW. The Swartland Substation will have capacity to accommodate the 1MW from Darling Green Solar and the proposed development.	CK Rumboll/ Swartland Municipality
	Until and unless the Municipality can confirm that the Darling substation has sufficient capacity to receive and distribute both the electricity generated by Darling Green Solar from its authorised facility (construction of which will be initiated well in advance of the municipal Darling Solar PV facility, if the latter is ever approved) <u>and</u> from the Municipality's proposed solar PV facility, the current municipal endeavours are, with respect, speculative. As such, the expenses incurred or to be incurred by the Municipality, including consultancy fees, might fall foul of the provisions of the applicable municipal public finance management legislation		Darling Green Solar only has land use approval for 10MW solar. Swartland Municipality signed a PPA to allow Darling Green Solar to connect to the Swartland substation for only 1 MVA and not 19 MVA as per objection. Darling Green Solar had discussions with Eskom to connect to their substation for a capacity of 5MW. The Swartland Substation will have capacity to accommodate the 1MW from Darling Green Solar and the proposed development.	CK Rumboll/ Swartland Municipality
	We point out that the basic assessment report contains no cumulative impact assessment pertaining to approved <u>and</u> potential solar PV projects proximate to its proposed site and at the very least, comprising Darling Green Solar's approved solar PV facility. The draft report does not even acknowledge the existence of the authorised Darling Green Solar PV facility. These deficiencies will have to be remedied by the inclusion of the required substantive reporting on these aspects in the next draft of the basic assessment report.		Noted. This has been included in the Draft BAR (see Section I).	EnviroAfrica
	As to the substance of the basic assessment and in particular, the specialist reports that accompanied it, we set out our client's comments below. Those comments relate in the main to various issues traversed in the basic assessment report, after which we provide our client's comments on the specialist reports that likely require further elucidation, and a possible consideration afresh of their current conclusions, by virtue of what is set out in these comments.		Noted	EnviroAfrica
	The comments on the draft basic assessment report are set out below in a sequence that follows the chronology of information in that report.		Noted	EnviroAfrica

	The environmental assessment practitioner ("EAP") states that the "applicant, Swartland Municipality, will undertake the activity should it be approved ...". ⁶ We point out that this statement is at odds with what is stated in the report titled "Proposed consent use to establish a solar photovoltaic facility on portion of erf 551, Darling" where the following is recorded: "Swartland Municipality's role does not involve direct operation of the development; instead, they are (sic) solely acquiring the essential land use rights for the proposed renewable energy facility. The specific development particulars will be submitted and assessed by Swartland Municipality after a developer has been identified". (Our emphasis.)		The Western Cape Province approached local government, namely Swartland Municipality, to obtain the necessary land use rights in both Darling and Malmesbury for the construction of two solar PV facilities. These facility rights will be sold by means of a tender process to provide the municipality with at least 6,5 MWp battery energy during stage 4 loadshedding to reduce the energy crisis in the Western Cape by selling electricity directly to the local municipality. The facility will belong to a successful tenderer and the municipality would rent/lease the output of the plant (MW) from the owner / operator of the facility for a minimum period of three years. At the end of the period, further decisions would need to be made regarding the extension / expansion or termination of the agreement. In the case of complete termination the owner of the facility would have to remove the equipment from the land or enter into a separate lease agreement for the use of the land with Swartland Municipality.	CK Rumboll/ Swartland Municipality
	To the extent that the Municipality proposes acquiring the relevant statutory approvals that it needs to undertake the development of the proposed municipal solar PV facility, and then contracts a third party to do so, that suggests that it may be eminently more feasible (and economically sustainable) to achieve the outcome of uninterrupted power supply without having to spend municipal capital in order to do so. The most sustainable way in which the Municipality could effect such an arrangement is by acquiring electricity for its residents and businesses from the electricity generated by private sector initiatives, as best exemplified in the local context by Darling Green Solar's approved solar PV facility.		Noted, the proposed initiative was directly from province.	CK Rumboll/ Swartland Municipality
23 February 2024	Although the pre-application BAR indicates that "DEADP Guidelines – All guidelines were consulted and adhered to when undertaking this Basic Assessment Report.", you are required to list and explain how the guidelines have influenced the development proposal.	Kraigen Govindasamy - Department of Environmental Affairs and Development Planning	Noted. The BAR has been updated to include the relevant guidelines in Section C	EnviroAfrica
	Although a list of specialist assessments has been provided, the pre-application BAR does not provide an explanation of how the proposed activity/development complies with the requirements of the protocols.		Please see revised Site Sensitivity Verification Report (Appendix I2, Table 2)	EnviroAfrica
	You are hereby advised that the BAR must contain all the information outlined in Appendix 1 of the NEMA EIA Regulations, 2014 (as amended), and must also include the information requested in this letter.		Noted. The EAP is of the opinion that the BAR contains all relevant information.	EnviroAfrica
	Can you please send me the location diagram of the proposed solar PV development. I presume this triggers S.38 of the National Heritage Resources Act, in which case can you please email me a copy of the Heritage Impact Assessment.	Graham Jacobs	Please find attached the locality map as requested. With regards to the Heritage Impact Assessment, a Notice of Intent was submitted to Heritage Western Cape (HWC) in terms of Section 38 in of the NHRA. Final comment was received from HWC stating that no further action is required (also find attached).	EnviroAfrica
Need and desirability				
23 February 2024	The BAR must indicate what the proposed site is earmarked for in terms of the Spatial Development Framework applicable to the area.	Kraigen Govindasamy - Department of Environmental Affairs and Development Planning	It should be noted that the area proposed for development is located outside the urban edge of Darling. A small portion of the area proposed for the facility is earmarked for Small Scale Agriculture. It should further be noted that the Spatial Development Framework is only a guiding document and cannot give rights nor take it away. It is very likely that that both the Small Scale Agriculture and the proposed solar PV facility can be accommodated on this portion of land (since a much later area is included in the study area then required for the PV facility).	CK Rumboll/ Swartland Municipality
14 February 2024	As regards need and desirability, the executive summary to the basic assessment report records that the "... site is ideally located on municipal property, that is underutilised, with little or no environmental constraints. It is directly adjacent to the municipal substation, thereby avoiding the need for additional overhead power lines."	Nicholas Smith Attorneys - on behalf of Messrs. Darling Green Utility (Pty) Ltd ("Darling Utility"); Darling Green Solar (Pty) Ltd ("Darling Green Solar"); and Darling Green Estate		
	We point out that Darling Green Solar's approved facility is already connected to Darling substation, and readily available.		Noted	
	We also point out that there is no reference in the basic assessment report to the loss of what appears to be land with an agricultural potential that cannot be discounted or wished away without good reason.		This is addressed in the Agricultural Statement, and Pages 48 and 59 of the Draft BAR	
	We respectfully submit that there should be an assessment of the need and desirability of the municipal solar PV facility that takes full and proper account of any and all other authorised solar PV project/s and what that approved facility (or those, to the extent that there might be more than one in the Municipality's area of jurisdiction) will offer on a likely shorter timeline than the municipal proposal assessed in the basic assessment report. Against that backdrop there must also be an objective assessment of whether the proposed municipal solar PV facility is, objectively viewed, necessary and desirable.		As mentioned above, this initiative comes directly from Province and can therefore be regarded as needed within the town of Darling and the local municipality. Swartland Municipality is well aware of the approved Darling Green Solar facility (as they were the one who approved it). Even though Darling Green Solar has been approved, Swartland Municipality is still of opinion that there is a need for this proposal.	CK Rumboll/ Swartland Municipality

	It may be that the uptake of electricity likely already generated and available for distribution via the Darling substation by Darling Green Solar should also be assessed as a reasonable and feasible alternative. In that context, the cumulative impact of approved and pending applications for EA that pertain to renewable energy supply in the Municipality's area of jurisdiction must be undertaken. In particular, the Municipality must establish whether the Darling substation has sufficient capacity to distribute electricity generated both by Darling Green Solar's approved solar PV facility and by the proposed municipal Darling Solar PV facility, should that be authorised.		Darling Green Solar only has land use approval for 10MW solar. Swartland Municipality signed a PPA to allow Darling Green Solar to connect to the Swartland substation for only 1 MVA and not 19 MVA as per objection. Darling Green Solar had discussions with Eskom to connect to their substation for a capacity of 5MW. The Swartland Substation will have capacity to accommodate the 1MW from Darling Green Solar and the proposed development.	CK Rumboll/ Swartland Municipality
	As regards the EAP's analysis of need and desirability ¹⁰ the EAP refers both to the Municipality's local economic interests and to the national interest given that the proposed solar PV facility "... contributes to the goals of the White Paper on Renewable Energy". It follows, according to the EAP that the present application can be seen positively in light of its ability to increase electricity capacity to contribute to the alleviation of the country's energy crisis as well as related demands including for diversified energy sources and the provision of future sustainable energy. The EAP also asserts that the proposed development is supported by the applicable town planning legislation and policies and programmes developed in support thereof.		Noted	EnviroAfrica
	As already pointed out, there are certain centrally relevant considerations (not least of which is the existence of an approved solar PV facility on our client's property) which has not been taken account of by the EAP. We reiterate the requirement to undertake a detailed analysis of all and any solar PV-related initiatives within the area proximate to the Municipality's proposed facility, and with particular reference to the capacity of the Darling substation to receive and distribute electricity from energy sources additional to the approved Darling Solar PV facility.		Noted	EnviroAfrica
	Under the heading "Desirability" (sic) the EAP asserts that the site for the Municipality's proposed solar PV is "... ideally located on municipal property, that is underutilised, with little to no environmental constraints ...". As already explained, it appears to us that a more detailed assessment of the impacts of the proposed municipal solar PV facility should be undertaken.		Specialist studies, including freshwater, biodiversity, visual and socioeconomic assessments, have been undertaken	EnviroAfrica
	The factors militating in favour of desirability, as described by the EAP take no account, much less proper account, of whether the Municipality's application for EA is desirable, when considered against existing approved facilities (with particular reference in this instance to Darling Green Solar's PV facility).		Please see above	EnviroAfrica

Agriculture

14 February 2024	As regards the conclusions reached in the executive summary, and with particular reference to the suggestion that the study area "... does not contain any intact natural vegetation of any significance and had been cultivated over a long period of time", we submit that long periods of cultivation suggests that the land was (and likely remains) of significant agricultural potential. That is borne out by the application of the sensitivity categories used by the DFFE's web-based environmental screening tool.	Nicholas Smith Attorneys - on behalf of Messrs. Darling Green Utility (Pty) Ltd ("Darling Utility"); Darling Green Solar (Pty) Ltd ("Darling Green Solar"); and Darling Green Estate	The agricultural assessment is that the site is not of significant agricultural potential, despite having been used as cropland in the past and despite being within a Protected Agricultural Area. The purpose of taking agricultural impacts into account in an EIA is to preserve future agricultural production potential, most importantly the preservation of land that is suitable as viable cropland. This site is considered marginal as a result of the combination of climate and soil constraints and therefore not suitable as viable future cropland.	Johann Lanz
	This aspect is addressed in more detail in paragraphs 36 to 38 of these comments and in respect of our client's comments on the "Site sensitivity verification and agricultural compliance statement for the proposed solar PV facility on part of erf 551, Darling". ⁸		Noted	EnviroAfrica
	The site sensitivity verification and agricultural compliance statement ("agricultural statement") asserts that the cropping potential of the site "... is limited by the combination of climate and soil constraints". Whilst the author accepts that rain-fed cropping may have been done on the site in the past he also asserts that such production "... is very likely to have become high risk and therefore no longer economically viable". He asserts that further constraints on the site's agricultural potential include the marginal agricultural potential of the site; and the fact that it is owned by the Municipality which "... further constrains the future agricultural production potential of the property".		Noted	EnviroAfrica
	The agricultural statement suggests that by virtue of the subject-property being suitable only for grazing, and there being no particular scarcity of such land in the country, that the use of this land for renewable power generation will "... cause minimal loss of agricultural production potential in terms of national food security".		Noted	EnviroAfrica
	In the circumstances, we suggest that it is likely appropriate for the author of the agricultural statement to undertake a more holistic assessment of the present and likely future uses of agricultural land within the Municipality's jurisdiction that falls within this category, particularly given that the site "... falls within an area that is classified as a Protected Agricultural Area". ¹² The author of the agricultural statement acknowledges that within Protected Agricultural Areas, "... the protection, particularly of arable land, is considered a priority for the protection of food security in South Africa". ¹³ While acknowledging that the land comprising the subject-property "... is at best marginal for cropland", at least according to the author of the agricultural assessment, the fact remains that it is situated within a Protected Agricultural Area. As such, we submit that the other reasons proffered by the author of the agricultural statement as to why it should be put to another use ("... a low likelihood that		It is indeed asserted in the agricultural assessment that within PAAs, the protection, particularly of arable land, is considered a priority for the protection of food security in South Africa. However, PAAs are demarcated broadly, not at a fine scale, and there may therefore be much variation of agricultural production potential within a PAA. All land within these demarcated areas is not necessarily of sufficient agricultural potential to be suitable for crop production, due to finer scale terrain, soil, and other constraints. The proposed development footprint is located on land that is very marginal for cropland. This land is not therefore worthy of prioritised protection as agricultural production land, even though it is within a demarcated PAA.	Johann Lanz

Alternatives				
14 February 2024	To the extent that the EAP submits that the proposed municipal solar PV facility "... as a whole should be authorised" we submit that this conclusion has been reached without proper regard to all relevant considerations and thus prematurely. A more holistic view, including an assessment of alternative approved energy generation facilities from which Swartland Municipality could derive electricity to be distributed by the Darling substation should be assessed as a reasonable and feasible alternative to the Municipality developing its own solar PV facility, or contracting a third party to build such a facility for the Municipality	Nicholas Smith Attorneys - on behalf of Messrs. Darling Green Utility (Pty) Ltd ("Darling Utility"); Darling Green Solar (Pty) Ltd ("Darling Green Solar"); and Darling Green Estate	Please see responses from CK Rumboll and Swartland Municipality above	CK Rumboll/ Swartland Municipality
	To the extent that Darling Green Solar's approved facility is or might be the only authorised solar PV facility proximate to the Darling substation, the EAP must take due and proper regard of that fact, and must report on the implications for the proposed municipal solar PV facility posed by the fact of Darling Green Solar's approved solar PV facility. At a minimum, the Municipality will be required to satisfy the competent authority that the Darling substation possesses of sufficient capacity to allow both solar PV facilities to be developed.		Please see responses from CK Rumboll and Swartland Municipality above	CK Rumboll/ Swartland Municipality
	In numbered paragraph 3 of the prescribed form for the basic assessment report and in response to the question framed there and pertaining to potential conflicts of interest with existing approvals for the proposed site (and with particular reference in this instance to the Darling substation, which is an integral component of the Municipality's proposed solar PV facility), the EAP records that there "... are no conflicts with respect to existing approvals".		Noted.	EnviroAfrica
	Another significant difficulty with the basic assessment report in its present form is the EAP's acknowledgment that the only alternative considered was that pertaining to the municipally-owned subject-property.		Noted. The proposed facility is still the only viable option. Additional power from other solar facilities in Darling, including the Darling Green Facility, is also considered, However, this would still not be sufficient, and the proposed Darling Solar facility (this application) will still need to be required). This has been included in Section H of teh Draft BAR.	EnviroAfrica
	There is no consideration of the eminently reasonable and feasible alternative afforded the Municipality by the provision of electricity from Darling Green Solar's approved solar PV facility; or the so-called "no-go" alternative. A full and proper assessment of all reasonable and feasible alternatives, that complies with the requirements of NEMA and the NEMA EIA Regulations must form part of the next and further drafts of the basic assessment report. To the extent that the no-go alternative has been traversed under paragraph 1.6 ¹¹ that is a superficial analysis. For example, suggesting that the "... provision of additional, renewable energy, reducing the impact of load shedding on the economy of Darling will not be realised" takes no account of Darling Green Solar's approved solar PV facility. As matters stand, the no-go alternative is superficially traversed.		Please see responses from CK Rumboll and Swartland Municipality above	CK Rumboll/ Swartland Municipality
	The most significant difficulty with the reporting in its present form is that the EAP adopts a very focused and project-specific approach to the assessment, against the broader backdrop of South Africa's current and ongoing electricity crisis, precipitated by the management and operation of Eskom. That (laudable) fact notwithstanding, it behoves the Municipality to consider, by way of a broader strategic environmental assessment, its approach to supplementing current electrical supplies. The Municipality might be better-served by purchasing electricity generated by private operators, such as Darling Green Solar, rather than establishing its own sources of energy production. The answer to that question is not presently clear – and that is why further work is required in order to establish the <i>status quo</i> pertaining to electricity generation within the Municipality's jurisdiction and with particular reference to the Darling substation's capacity; and the interests of the residents currently served by that substation.		Please see responses from CK Rumboll and Swartland Municipality above	CK Rumboll/ Swartland Municipality
Services				
14 February 2024	We submit on behalf of our client that it behoves the EAP to consider the substantive question as to whether the Darling substation has sufficient capacity to distribute electricity generated both by Darling Green Solar's approved solar PV facility; and the Municipality's proposed facility. The EAP's current response to the question is incomplete in the circumstances.	Nicholas Smith Attorneys - on behalf of Messrs. Darling Green Utility (Pty) Ltd ("Darling Utility"); Darling Green Solar (Pty) Ltd ("Darling Green Solar"); and Darling Green Estate	Please see responses above	CK Rumboll/ Swartland Municipality
	In the context of the EAP's assertion that the municipal proposed solar PV facility meets the Municipality's Spatial Development Framework ("MSDF") and in particular, addresses what the EAP refers to as certain " <i>vulnerabilities in the local economy</i> " ⁹ by proposing an additional renewable energy facility, and as already stated, we submit that the starting point must be a proper analysis of existing additional alternative renewable energy facilities, such as Darling Green Solar's proposed solar PV facility. It is only against that baseline that the Municipality can establish the extent to which it should be undertaking the provision of energy on additional municipal resources.		Please see responses above	CK Rumboll/ Swartland Municipality