

COMMENTS AND RESPONSE TABLE

THE PROPOSED DEVELOPMENT OF A RESIDENTIAL DEVELOPMENT AND THE CONSTRUCTION OF ASSOCIATED INFRASTRUCTURE ON PORTION 88 OF THE FARM KRAAIBOSCH No. 195 GEORGE

Comments received	
Comment	Response
<p>ORGANISATION: Cape Nature NAME: C Fordham</p>	<p>DATE: 29 Julie 2019</p>
<p>CapeNature understands that any indigenous vegetation that requires removal will be rescued and used for rehabilitation purposes. CapeNature would like to reiterate that all endangered species or protected species listed in Schedules 3 and 4 respectively, in terms of the Western Cape Nature Conservation Laws Amendment Act, 2000 (Act No. 3 of 2000) may not be picked or removed without the relevant permit, which must be obtained from CapeNature. This is also to ensure that rescued plant material is accounted for and used in the rehabilitation or relocation process. To obtain such permits please contact the relevant Conservation Services Officials at the George CapeNature Regional Office or use the following website address http://www.capenature.co.za/permits-information/.</p>	<p>Your comments are noted. The Client will be notified of the obligation to obtain permits for the for Schedule 3 and Schedule 4 plants should they occur.</p>
<p>CapeNature would like to also remind the landowner that in terms of the Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983) ("CARA"), landowners must prevent the spread of alien invasive plants on the property. The level of alien infestation is therefore not be seen as reducing the sensitivity of a site, nor is the subsequent removal of alien vegetation from a property regarded as a mitigation measure due to this is being a legal requirement. Infestation by alien plants does not necessarily mean that an area is not important for biodiversity as some vegetation types are particularly prone to invasive alien infestation, but may recover when cleared of alien vegetation.</p>	<p>Your comment is noted. The property does however not have any rare or endangered vegetation on the site, as stated in the Botanical and Ecological Assessment, see Appendix G1, and the alien vegetation will be removed.</p>
<p>In addition to CARA, in terms of the Alien and Invasive Species Regulations, NEM: BA, 2014, specific alien plant species (e.g. <i>Acacia mearnsii</i>) are either prohibited or listed as requiring a permit; aside from restricted activities concerning, <i>inter alia</i>, their</p>	<p>Your comment is noted, all alien trees will be removed and the site will be in condition of approval.</p>

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<p>spread, and should be removed; without the use of heavy machinery (as this could trigger activities listed i.t.o. the EIA Regulations of 2014). All alien trees such as <i>Acacia mearnsii</i> present at the property should be removed as they are a propagule source for further spread of invasive alien plants.</p>	
<p>Does the EAP have any records of the property undergoing a legal change in land use within the past 10 years?</p>	<p>No record is at hand currently.</p>
<p>The Fynbos Forum Ecosystems Guidelines for Environmental Assessment in the Western Cape provides guidelines for the compilation of botanical\ecological specialist assessments, as does Appendix 6. It is understood that the specialist report compiled is a Botanical and Ecological specialist report, can the specialist and EAP provide proof of compliance with Appendix 6 and de Villiers et al. (2016) as is required by CapeNature and relevant Competent Authorities?</p>	<p>A checklist is provided together with the study to prove compliance to Appendix 6. Further with regard to the Fynbos Forum Ecosystems Guidelines, the ecologists report aligns with chapter 6 of the guideline specifically with regard to the preservation of riparian areas where thicket occurs. This is evident when looking at the sensitivity map and no-go area protecting a patch of indigenous thicket (see Figure 3 of Ecological Assessment) as well as section 4 of the report (See Appendix G1).</p>
<p>Comments directed at ecological specialist</p>	
<p>a) The Cape Floristic Region is largely a fire-dependent system and natural fire regimes must be maintained and managed in the landscape. The exclusion of fire from certain habitats is considered unacceptable as this may ultimately cause the loss of species and proliferation of alien plant species. Where appropriate, the location of fire-breaks should be indicated and these fire-breaks must be considered part of the development footprint. Fire-breaks must be brush-cut and vegetation must not be completely removed. Brushcutting must occur as infrequently as possible as brush-cutting will lead to loss of species diversity over time. A fire-risk assessment can help inform an appropriate layout for developments adjacent to fire-prone vegetation.</p>	<p>Mr Coetzee from CMS states that if the site is cleared of alien invasive no fire breaks will be necessary. Fire prevention within the development can be achieved with sensible landscaping such as lawns and other evergreen planting (low fuel potential). A Fire Management Planting plan can be developed as part of the conditions of approval.</p>
<p>b) Can the specialist provide guidance regarding a suitable ecological burning regime for the vegetation?</p>	<p>According to Mr Coetzee the area of the site is too small and risky to implement a burning regime. The burning of such a small area, if developed will pose a danger to the houses that are developed. It is rather suggested that the open space should become more of</p>

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	indigenous garden. Rather than burning of fynbos, the fynbos can be mowed if regeneration is required.
c) There are records of the Critically Endangered <i>Gladiolus fourcadei</i> nearby which flowers in October (the field assessment was completed in Summer)? Does the specialist not think that an additional survey is necessary to try locate the bulb rather during the flowering season?	According to Mr Coetzee the site is not deemed suitable for the <i>Gladiolus Fourcadei</i> . It is a completely different aspect and slope to the area where <i>Gladiolus Fourcadei</i> were found.
d) If the applicant had managed his land correctly, removed aliens and undertaken the prescribed ecological burning regime, is it possible that this bulb would be present on the property?	Mr. Coetzee states that the occurrence is not likely both at present and in the past.
e) Similarly, if the applicant had managed his land correctly, removed aliens and undertaken the prescribed ecological burning regime, can the specialist provide an informed opinion about what type of vegetation should be growing on the farm?	Mr Coetzee states that states that there is no certainty as to the type of vegetation that may have occurred on site. Further stating that we don't know what was on the property prior to it being managed. Further stating that early inhabitants repeatedly burnt the landscape for their cattle and sheep grazing until the time of European settlement. The Vegetation may have been a mix of forest and thicket or a mosaic of thicket and fynbos.
f) The specialist should note that the WCBSP layers indicate that the properties importance from primarily a watercourse and ecosystem service perspective. The reasons layer is where such information is detailed. CapeNature maintains the WCBSP is useful in terms of fine scale development planning, but the specialist should consult the reasons behind WCBSP delineation before criticising the layers, also taking into account the legal obligations of the landowner.	Your comment is noted, the layers are in any event taken into account by the aquatic ecologist.
g) It is unclear how any development cannot have any negative ecological impact on ecological processes and ecological infrastructure. Impacts such as from a faunal habitat fragmentation perspective, (the property will be fenced in changing faunal movement patterns), the soil biota will forever irreversibly be changed, there will be domestic pets which will prey on indigenous birds, there will	Mr Coetzee explained that the ecological processes have already changed to a large extent, the soil has a large reserve of alien invasive plant seeds that keep germinating, changing the ecological processes. Furthermore, the pH of the soil has changed (more acidic) and the status is changed (more nitrogen), the biota has already been severely compromised.

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<p>be gardens which increase the risk of new alien plant introductions, there are numerous impacts that need to be considered prior to quantification of such broad statements.</p>	<p>With regard habitat fragmentation Mr Coetzee explains that the area is already transformed except for small patches of unconnected fynbos. The domestic cat is also reported to have occurred on site during a site visit, as well as other areas including the mountain. The placement of fences is already occurring on surrounding properties, leading to wildlife already being excluded and contained.</p> <p>The probability that gardens will introduce new alien plants is deemed to be unlikely, as the site is already infested by invasives and other alien plants would struggle to spread in the already transformed area. It must be remembered that the site falls within a severely transformed area affected by human activities, and it is a non-pristine landscape.</p>
<p>h) Does this landowner wish to explain how the project expects to make R800 000 000 from the development, but the cost of removing aliens and maintaining this property as a natural area has not being possible? Also, if he had chosen to maintain his property correctly, what vegetation should have been naturally occurring on the property?</p>	<p>The landowner is currently in the process of transferring most of his property to the applicant developer and since the developer then becomes responsible for the site. Therefore, it should be noted that the landowner does not currently have the R 800 000 000. Also note this is the project's economic impact. This is not the profits to any one party.</p> <p>The aspect of what vegetation would occur on the site is addressed in the response to comment (e) above.</p>
<p>i) There are mandated departments and directorates, within the Republic that issue directives to municipal and state landowners to clear alien infested, state owned properties, of alien vegetation (for example: DEA issuing alien clearing directives directly to Eden District Municipality). Therefore, CapeNature requests that the ecologist report the locations of alien infested state owned properties, through the suitable channels within the mandated departments, to relevant authorities to assist in the issuing of directives accordingly. Should these properties not have alien clearing management plans associated with them then suitable action should be taken by the mandated officials to ensure compliance. Just because the state doesn't remove all aliens on all of their properties at once doesn't</p>	<p>Your Comment is noted. The developer will clear all aliens.</p>

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mean there is no plan in place and it also doesn't mean that private landowners can ignore relevant legislation.	
j) CapeNature understands the ecologist's frustration that not all state owned land are free of alien plant species, but this cannot be used as a motivation to not maintain private property in a suitable state. Are there any reasons why this landowner has not maintained their property in line with relevant legislation?	Noted, reasons behind the state of the property management are unknown. There are many landowners both stet and private who have not complied or in the process of compliance with the legislation. The developer will comply.
k) The ecologist didn't consider the No-Go alternative impact where the landowner rehabilitates the vegetation accordingly back to what is supposed to occur on site? Rehabilitation of any disturbed ecosystems is only considered successful when the ecosystem has returned to an ecologically functional state and has a similar species assemblage as its natural state.	The no-go alternative has been assessed by the Ecologist, but the no-go may not mean that the fynbos would be restored but rather that the aliens will be removed.
l) CapeNature reiterates that clearing of alien vegetation will not be considered as a mitigation measure, that offsets the environmental impact of a development, as this is a legal requirement.	Your comment is noted, the removal of aliens is not a mitigatory measure on its own, it is in combination with the rehabilitation of the open space.
m) Should the applicant allow subsequent owners to be permitted gardens or animals, the impact of potentially new alien plant/faunal species being introduced into these habitat should also be rated accordingly	Your Comment is noted, we have taken this into account, the area will become and will be similar in plant and animal make up as other surrounding suburbs.
Further Comments from Cape Nature	
The wetland specialist report author needs to update table 3 to correctly reflect the references referred to in section 3.2	The report attached to the Pre-App BAR was a Phase 1 report, the entire report has been updated and is attached to this Draft BAR.
It is unclear why a stormwater management plan was compiled and appended to the PreBAR given the importance of the changing land use?	The Stormwater Management was still in the process of being compiled, the plan has been attached to Appendix I3.
Given that the farm is dominated by alien tree species, and that the proposed development will result in an increase in runoff, how it feasible is it to assume that the riparian and wetland habitat extent will increase in size?	As per the aquatic specialist it is possible that the inundated area of the wetland will increase with additional water inputs. However, the pipe culvert acts as a control on the water level. It is likely that increased flows will simply flow through the pipe when they reach a certain level.

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<p>Why were both alternatives not assessed separately in the wetland specialist report, also why does it appear as if the sewer line location was not assessed? Yet in the Pre-BAR report there are positive wetland impacts, for both alternatives and the No-Go is a neutral impact despite the No-Go requiring the landowner to comply with all relevant South African legislation? Can the EAP and/or wetland specialist elaborate on these inconsistencies accordingly?</p>	<p>This is noted, the Freshwater Impact Assessment has in the meantime been completed assessing the impacts of various options of development including the location of the sewer line (see Appendix G 2) The impact assessment has been amended accordingly, and no longer reflects positive impacts with regard to the wetland.</p>
<p>How did the EAP incorporate the recommendations of Figure 9 from the wetland specialist report? The specialist has valid scientific reasons and peer-reviewed scientific tools for the implementation of a buffer area and the relevant setback of the units away from such no-go zones, why does this not appear to have been considered as part of the preferred alternative?</p>	<p>The Freshwater Habitat Report has been updated, as it contained an outdated version of the layout. The current layout largely takes into consideration the buffer. The layout only encroached into the buffer at approximately 2-3 erven. The Freshwater ecologist on p. 4 and 42 of the updated report (Appendix G 2) further states that this encroachment does not cause a significantly high impact on the freshwater ecology.</p>
<p>CapeNature requests that all no-go zones be overlaid onto the preferred alternative to note compliance with specialist findings.</p>	<p>Following the recommendations of the report dated Freshwater Habitat Assessment (Appendix G2), the applicant made some layout changes. The amended layout adheres to the buffers delineated in the report except for and approximate 2-4 erven that infringe slightly into the 15m buffer see Figure 5 of Freshwater Impact Report (Appendix G 2). However, the occurrence of these erven within the buffer where assessed and it was determined that this encroachment will not cause any significant negative impacts on the freshwater ecology (see page 4 and 42 of the Freshwater impact Assessment).</p> <p>Furthermore, it should be noted that the applicant changed the layout in consideration of the socio-economic as well as the physical parameters. The cost however of not developing the erven within the urban edge of George is great.</p>
<p>CBA regions are areas delineated that are in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure stipulated in the Land Use Advice (LUA) Handbook (Pool-Stanvliet <i>et al.</i> 2017) although the Farm selected may have undergone a level of</p>	<p>The management objectives as stated in the Land Use Advice (LUA) Handbook (Pool-Stanvliet <i>et al.</i> 2017) where considered in Section B: 6 Biodiversity of the Pre-App. The site/ development was discussed in relation to these objectives. A reference has been added where relevant to this section.</p>

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<p>disturbance, this cannot be used as motivation for establishing of development within CBA 2 (degraded CBA) or ESA 2 (degraded ESA) areas. It should be noted that it is the landowner's responsibility to ensure his property is suitably maintained at a level consistent with LUA guidelines. The loss of the CBA 2 on the site will therefore compromise conservation targets and the loss of ESA 2 would compromise the CBA. Could the EAP discuss this development in context with the CapeNature LUA guideline document? Reference to this document was not found within the Pre-BAR</p>	
<p>Using specialist findings, a detailed No-Go Areas map should be compiled and appended to the Environmental Management Programme (EMPr). The aim of this map is to sensitise the contractor to the location of sensitive habitat relative to construction footprints. This will also empower the Environmental Control Officer (ECO) to ensure the strictest level of compliance regarding the protection of sensitive habitat.</p>	<p>A No-go map is included in the EMPr. To be amended as specialist studies change.</p>
<p>ORGANISATION: George Municipality (Civil Engineering Services)</p>	<p>DATE: 30 Julie 2019</p>
<p>NAME: Ms. L Mooiman</p>	
<p>COMMENT / ISSUE: It is confirmed by the Municipality that the proposed development is included in the general growth and development infrastructure planning for George Municipality. In order to connect to the municipal system all the new supporting infrastructure must be constructed. Standard development conditions stipulated during the landuse application and services agreement must be adhered to.</p>	<p>The applicant will negotiaate a services agreement with the municipality.</p>
<p>ORGANISATION: DEADP NAME: J. Christie</p>	<p>DATE: 29/07/2019</p>
<p>(3.1) The Pre-Application BAR (Pre-App BAR) as submitted to this Directorate does not comply with Regulation 19(3) of the Environmental Impact Assessment Regulations 2014 (GN No. 982 of 4 December 2014, as amended 7 April 20a 7) as the Pre-BAR does</p>	<ul style="list-style-type: none"> • With regard to the assessment of alternatives (3.1.1) he Basic Assessment report has been amended to include the sustainable measures mentioned as well as adding. • The timeframe linked to implementation (3.1.2) of the project referred to in the Pre-App Bar as well as the planning report are

<p>not comply with Appendix 1 of said regulation. The above determination is based on inter alia the aspects highlighted below:</p> <p>(3.1.1) Alternatives and Need and Desirability</p> <p>Be advised that in terms of the Environmental Impact Assessment Regulations, 2014 and the National Environmental Management Act, 1998 ("NEMA"), the investigation of alternatives is mandatory. All alternatives identified must therefore be investigated to determine if they are feasible and reasonable. In this regard it must be noted that the Department may grant authorisation for an alternative as if it has been applied for or may grant authorisation in respect of all or part of the activity applied for.</p> <p>...</p> <p>It is this Directorate's opinion that there are technological alternatives that can be considered. Reference is made in the Town Planning Report (Annexure F Architectural Residential Design Guidelines) to solar heating panels and in the Pre-App BAR itself, it is suggested in the Civil Engineering Report that 2500L water tanks will be implemented: however, this is not captured in the abovementioned annexure in the planning report. It is not clear why technology alternatives e.g. to reduce resource demand and increase resource use efficiency has not been identified and included in the alternatives. If this aspect cannot be addressed and considered, then it must be proven how this development would contribute or support sustainable development.</p> <p>(3.1.2) Implementation Programme</p> <p>Please note that, in accordance with the provisions of the Environmental Impact Assessment Regulations, 2014, a period for which the environmental authorisation is required must be</p>	<p>correct. The implementation programme is currently 54 months which is 4.5 Years. This timeframe is linked and supported by the fact that a Town Planning Authorisation from when it is issued is only valid for 5 years based on the Spatial Land Use Management Act, as was explained by Mr. Vrolijk. (Section 43(2) of SPLUMA, 2015 clearly states this). It is however anticipated that due to this allowed time by SPLUMA is very limiting that an amendment to the Act or By-laws will be made in the near future. Estimated dates have also been added to the timeline (see Section A of the Basic Assessment Report).</p>
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<p>provided. This period must be informed by the operational aspects and the non-operational aspects of the proposed development. As such, the date on which the activity (activities) will be concluded and the post construction monitoring requirements finalised, must be determined.</p> <p>This Department requests that a realistic implementation programme be provided which sets out the construction phase (non-operational aspects) of the proposed development and specifies the period required to conclude the respective activities (a date on which the activity will be deemed to have been concluded should be derived from such a programme). The date of commencement must be factored into the latter timeframe, this should include aspects such as availability of municipal services (where applicable) and obtaining other relevant approvals or prior to commencement of the activities. If the proposed development will include operational aspects, these aspects must be identified and the period for which the environmental authorisation is required must be provided. The time periods included in the Pre-App BAR and what is written in the planning report are conflicting and seem unrealistic.</p> <p>(3.1.3) Synchronisation applications: WULA-EIA processes</p> <p>... Clarity needs to be obtained from the BGCMA as soon as possible to determine the applicability of said Act (National Water Act)</p> <p>Please be reminded of the "One Environmental System" principles that must be applied to applications of this nature. Please refer to this Departments circular: EADP 0028/2014 in this regard.</p>	<ul style="list-style-type: none">• With reference to 3.1.3 a WULA has been applied for, and the two processes are currently being aligned. We understand that the processes need to align.
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<p>You are reminded that if these processes are not aligned, the lack thereof or delay as a result thereof may prejudice the success of the outcome of this application for environmental authorisation</p> <p>(3.1.4) Impact Assessment</p> <p>It is noted that the assessment of the duration of impact has provided for five (5) categories. More detail is required with reference to the “temporary”, “short term” and “medium” category as the temporary and medium term are vastly similar and the short-term duration could possibly be longer than the medium term.</p> <p>Please note that the cumulative impacts for all impacts must be assessed and reported on. In this regard care must be taken to ensure that where cumulative effects can occur that these are considered and reported on as additive (incremental or accumulative); interactive; sequential; or synergistic.</p> <p>It is noted that the new gravity sewer line has not been assessed in the Pre- App BAR nor has the Freshwater Specialist. Clarity on this is required. The bulk sewer pipeline to the Glenwood pump station must be assessed by all the appointed specialists and their reports updated accordingly.</p> <p>The section in the Pre-App BAR that requires a description of the gaps in knowledge and the uncertainties and under assumptions is incomplete. Therefore, the impact assessment is misleading.</p> <p>The Freshwater Specialist made numerous assumptions in her report but none of these were actually incorporated into the Pre-App BAR.</p>	<ul style="list-style-type: none"> • The methodology behind the Impact Assessment has been adapted to clarify the duration of associated impacts (refer 3.1.4). • The impact of the sewer line has been incorporated into the basic assessment report and has been taken into account in the specialist studies. The Freshwater Impact Assessment in Appendix G2, gives a full impact assessment and description of all the associated impacts. • The report has been amended to address this comment. All the assumptions stated in the Freshwater Specialists report are not all deemed to be relevant to the BAR, as this report is also a stand alone component informing the BAR.
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<p>(3.1.5) Specialist Reports</p> <p>The contents of the specialist reports must meet the requirements outlined in Appendix 6 of GN No. 982 of 4 December 2014. The specialist reports as included and received by this directorate do not meet the requirements in Appendix 6 as mentioned above. The specialist reports must be revised to comply with the requirements. ...</p> <p>Based on information in the Pre-App BAR, Notice of Intent Form, and the aspects raised during the pre-application meeting, this department reiterates its advice that the following specialists be appointed to assess and report on the impacts regarding the proposal, namely: (a) Freshwater Aquatic Specialist (b) Botanical Specialist (c) Visual Impact Assessment and (d) Heritage Assessment.</p> <p>(3.1.6) Visual impact Assessment</p> <p>It is noted that Layout Alternative 1 includes a portion of land earmarked for Phase E for the development of flats (i.e. Residential Zone IV). Although it is noted that the objective of this zone is to promote higher density residential development within the urban context; such a zone has particular location requirements, such as proximity to transport and amenities, and should not be randomly located without due consideration of the availability of open space and community facilities. It is noted this zone is situated on the Northern Boundary of the property. It is stated that Alternative 1 will have three-/four-storey building earmarked for flats allowing Madiba drive which will have a higher visual impact from the road. Furthermore, although the proposed flat about the open space</p>	<ul style="list-style-type: none"> • With regard to requirements set out in Appendix 6 your comments are noted. The specialists confirm their compliance to this appendix within their reports (3.1.5). • The Freshwater impact Assessment and Botanical specialist study have been done and attached in Appendix G1 and G 2. Heritage Western Cape exemption has also been attached in appendix E2. With regard to • Following the changes made to the layout initially proposed in 2017, where the flats were removed, the development links in with the existing and future residential vision for the area. Also refer to Figure 7 of the draft report. This response applies to 3.1.5 and 3.1.6
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<p>area, it may be regarded as a hill or high-lying ground overlooking the Seven Passes Road (Madiba Drive).</p> <p>It is unclear from the Pre-App BAR how this aspect has been assessed and mitigated as no specialist input or assessment has been provided.</p> <p>(3.1.7) Environmental Management Programme (EMPr)</p> <p>The contents of the EMPr must meet the requirements outlined in section 24N(2) and (3) of the National Environmental Management Act, 1998 (Act no. 107 of 1998) ("NEMA) and Appendix 4 of GN no. r. 982 of 4 December 2014. The EMPr must address the potential environmental impacts of the activity throughout the project life cycle, including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing).</p> <p>Greater clarity is required on the impact management outcomes in the EMPr, amongst others. It is also requested that the terminology in the EMPr related to the execution of tasks be checked for consistency.</p> <p>It is noted in the EMPr that there is a section dealing with audits that must be undertaken at a required frequency. It is written that <i>"the Applicant is responsible for appointing, managing and remunerating the appointed auditor. The auditor may be the appointed Environmental Control Officer (ECO), provided the Eco is sufficiently qualified and experienced to fulfil the auditing requirements specified. The appointed auditor must undertake environmental audits according to the frequency specified in the Environmental Authorisation"</i>. This is not deemed appropriate as the EAP must have the discretion to suggest a frequency of audits</p>	<ul style="list-style-type: none"> • The EMPr has been adapted and is attached in Appendix H.
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<p>as the competent authority will have the discretion to change if deemed necessary. Furthermore, an auditor must be independent, the ECO can't fulfil the role of the auditor. Also, all ECO reports are to be submitted to the competent authority on a monthly basis, in hard copy.</p>	
<p>(3.2) National Web Based Screening Tool Please note that from 4 October 2019 it will be compulsory to include the report generated from the national web based environmental screening tool, as contemplated in Regulation 16 (1)(b)(v) of the Environmental Impact Assessment Regulations, 2014 (as amended) when submitting an application for environmental authorisation in terms of Regulation 19 of the EIA Regulations, 2014.</p>	<p>The regulation has not formally been published. The Screening report has been attached to the application form.</p>
<p>4. The Directorate awaits the submission of the Application Form Prescribed by the EIA Regulations, 2014. Please note that one printed copy and one electronic copy (saved on CD/DVD) of the Application Form must be submitted.</p>	<p>Noted, we will provide this</p>
<p>ORGANISATION: BGCMA NAME: C. Abrahams</p>	<p>DATE: 31/07/2019</p>
<p>Please refer to the letter from George Municipality pertaining the waste water and the capacity upgraded at the Outeniqua WWTW Can you please provide clarity in terms of the way forward. Will effluent only be able to be discharged to the Outeniqua WWTW after completion of works early 2021.</p>	<p>Yes, effluent will only be able to be discharged to the Outeniqua WWTW after completion of works early 2021. The applicant is aware of this.</p>
<p>Please note that all recommendations need to be adhered to as provided by the freshwater ecologist in her study dated April 2019. Also adhere to all buffer areas recommended.</p>	<p>Following the recommendations of the report dated 10 April 2019, the applicant made some layout changes. The amended layout adheres to the buffers delineated in the report except for and approximate 2-4 erven that infringe slightly into the 15m buffer see Figure 5 of Freshwater Impact Report (Appendix G 2). However, the occurrence of these erven within the buffer where assessed and it was determined that this encroachment will not cause any significant negative impacts on the</p>

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	<p>freshwater ecology (see page 4 and 42 of the Freshwater impact Assessment).</p> <p>Furthermore, it should be noted that the applicant changed the layout in consideration of the socio-economic as well as the physical parameters. The cost however of not developing the erven within the urban edge of George is great. In addition to the loss of economic contributions made due to the development, labourers that would have built those houses will lose the income they would have generated from those hours of labour.</p>
<p>Note that the layout map pertaining to bulk sewer pipelines indicate that a pipeline might cross the non-perennial watercourse. Therefore, a water use license application will be required.</p>	<p>An application for a water use license application was submitted on 2 September 2019 with the following reference: WU12833. A letter stating the further technical requirements for the WULA are attached in Appendix E4.</p>
<p>ORGANISATION: Western Cape Government: Road Network Management NAME: E. Burger</p>	<p>DATE: 16/09/2019</p>
<p>A Traffic Impact Assessment Study is as soon as possible forwarded to this branch for its perusal and comments.</p>	<p>After liaising with Mr. Fivaz from the Municipal Roads and transport division it can be confirmed that Portion 88 of Kraaibosch falls within a section for which the municipality has agreed to undertake a Traffic Impact Assessment. SMEC are the appointed consultants to conduct and update this TIA.</p>
<p>This branch should be offered the opportunity to comment on the Land Use Application, that must be circulated to the Local Authority.</p>	<p>Noted, these comments have been passed on to the Town Planner, Jan Vrolijk.</p>