

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

#### **COMMENTS RECEIVED DURING THE (30-DAYS) POST-APPLICATION PUBLIC PARTICIPATION ON THE DRAFT BASIC ASSESSMENT REPORT.**

***NOTE: This table should be read in conjunction with the Pre-Application Comments and Responses Report, which includes detailed responses to the main concerns raised by I&APs***

Nr	Comment Received	Date Received	I&AP	Company / Representing	Response
<b>State/Provincial Departments</b>					
1.	There is already a issue with sewerage water that gets dumped into the Garden route dam from the adjacent residential area. It could be due to load shedding or whatever but remains completely unacceptable. If we can get the main benefactors of this project to take a bath and drink the water from the parts of the dam the sewerage gets spilled for a month or two then we are all systems go.	16 April, 2021	Daniel Wiese	Private individual	<p>Section 3.1.7 of the Pre-Application Comments and Responses Report addresses sewerage management. Its states:</p> <p><i>"In terms of the sewage management, the sump of the pump station would receive the sewage flow and act as a storage vessel from where sewage is periodically pumped. The sump would comprise an active volume and a relatively small internal emergency storage volume depending on the size of the sump however, it is preferred that an extended emergency storage facility be built especially due to the sensitive nature of this development are. The active volume is defined by the operating levels of the sump.</i></p> <p><i>The emergency storage capacity provides additional safety when the pumps fail, in that it provides time for the Municipality's maintenance operatives to make the necessary repairs as well as catering for normal power outages. A minimum storage capacity that is equivalent to four to six hours' flow (George Municipality suggest 8 hours flow) at the design flow rate would be provided. The emergency storage would be provided outside of the pump station.</i></p> <p><i>In terms of break downs, the pump stations would be provided with emergency mobile generator</i></p>

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					<p><i>units, to allow the continued operation of the pump stations during prolonged interruptions to the power supply. The suggestion of using mobile generators rather than having a permanent generator room is due to the fact that the emergency storage tank will have enough “downtime” capacity for normal power outages. Mobile generators can be stored at the Municipality’s Maintenance facility in close proximity to the development where it can be better maintained.</i></p> <p><i>The pump stations would also be given a telemetry system to control the operations of the pump stations and report any problems to the 24-hour emergency monitoring point, which would notify the relevant response team of any technical issues at the pump stations.”</i></p>
2.	<p>Thank you for having sent the proposed university precinct documents for review. I have a couple of concerns, some are minor and some major. Let me list them in order of importance.</p> <p>1. I do not believe the motivation section is accurate. Considering that it is highly unlikely that the respective developer will build sub-standard low-cost housing in the designated areas, it is then also highly unlikely that there will be affordability of the residential units for any broader social group. Thus, the character of the residential area will be very similar to what it is now and will not broaden the social integration. The same will apply to student residences, where the government funding will hardly stretch to cover student accommodation costs in this area. I am not objecting to this aspect, I am merely pointing out that the motivation is not solid.</p>	17 April, 2021	Barbara Wood	Private individual	<p>Your comment is noted and will be further explored in the Environmental Impact Assessment Phase.</p>

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3.	2. The second flaw in the motivation is that of job creation. However, other than if the respective developers and construction companies were to hire workers ONLY from George, and provide jobs for them beyond the completion of the project, no additional jobs will be created on a permanent basis other than probably a handful of service personnel for the planned small-scale hotel (limited height restrictions????) and cleaning staff for the university campus.				It is anticipated that, as at other University precincts, employment would not only include University teaching staff, but associated services such as cleaners, security, sports coaches, cafeteria staff as well as off campus employment such as student housing management, transportation, events management and small businesses.
4.	3. There are severe challenges with infrastructure, as currently, there have been a number of major sewerage and fresh water pipe bursts and regular power outages in that specific area, so how will the Municipality cope with the extra number of houses and some high-density structures when currently the Municipality cannot cope even without such project being completed? I congratulate the Municipality for having gone out of its way at all times to repair such occurrences, despite the impact of Covid-19, late night happening work and staff having to work over weekends. Much appreciated - but it will have to take into consideration that there will be an additional burden in that area, probably necessitating a whole new infrastructure plan.				Various infrastructure upgrades are included into the development proposal. These include both sewer and water service upgrades – See Section 4.2.2 of the Scoping Report.
5.	4. Traffic along Stander will have to be carefully considered as Stander borders school property and a school boarding house. Extra traffic can endanger school children's lives. Thus, access to the proposed precinct should ideally be off Saarsfeld Road or Knysna Road, and not become additional traffic through a quiet suburb.				<p>The site will be served by three accesses, as follows:</p> <ul style="list-style-type: none"> <li>▪ Access 1 along Stander Street (opposite Arthur Bleksley Street);</li> <li>▪ Access 2 along Saasveld Road (between Meyer Street &amp; Access 3); and</li> <li>▪ Access 3 along Saasveld Road (opposite Road 1).</li> </ul>

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6.	5. Will the new precinct become a fenced area, with access being closed off only for the university grounds? Or will the total area be open?				It is anticipated that the majority of the area would be open access.
7.	Please consider what is currently happening in other universities, where protest action is destroying university property as well as that of private residences. How will the university and the Municipality be able to control such potential protest action and the surrounding properties?				It is acknowledged that there may be more noise, public disturbance and possibly even protesting associated with the provision of the campus and student housing. Unfortunately, these are part of modern day social ills in South Africa and around the world and the extent of which cannot be predicted with any accuracy.
8.	What does the Municipality plan regarding access for local residents who want to access the Garden Route Dam for hiking, cycling, etc. purposes?				As per Section 3.1.1 of the Pre-Application Comments and Responses Report, the proposal aims to improve access for cyclists, trail runners, walkers and canoeists, fishermen, amongst others to the existing recreational areas around the dam. This area has historically been used by the public as a recreational area and the proposal aims to enhance this aspect. As such, an Open Space of approximately 67ha is proposed around the development area to be utilised for these uses.
9.	Will residents who currently can walk to the dam be able to still do so in future?				
10.	Will the green belt around the dam remain open for such access?				
11.	What happens with the area where the commercial activity and the hotel are planned?				
12.	Will one still be able to walk around the dam there?				
13.	Where will cars be able to park for people who want to hike in the area and where will such access be?				It is likely that the prices of property surrounding the campus will increase over the long term due to the location of the properties and the fact that people can walk to work, the sports facilities and the campus. There may be micro fluctuations both in location and price depending on location but overall it is likely that the property prices will increase compared to those not located near the
14.	Regarding the impact on property values of those properties adjoining the planned development, such impact will obviously be negative not only if the views will be restricted, but also if any of the higher-rise units, higher-density units or student residences will be built close to those properties. Thus, ideally, such residential zoning should move from outside towards the sport grounds,				

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	from higher-priced units towards lower-priced units.				campuses. This is discussed in detail in the Socio-Economic Baseline Report, compiled by Tony Barbour in February 2019. Barbour (2019) provides case studies from existing universities and clearly describes the benefits the development of these have had on the towns within which they occur.
15.	7. I trust that your reference to the flood line takes into consideration that with an increasing population number, George may well have to raise the dam wall even more in future to accommodate the increasing water needs.				The proposed development will take place over the next 10 to 30 years and in that time the provision of water from the various water resources may also be upgraded to accommodate population increases.
16.	Please see my comments as constructive input for the plan. I have served on the Business Forum of the Johannesburg Metro for a long time before moving to George, so I fully understand the complexities of commercial/economical priorities, socio-economical pressures and realities of land issues. I wish you lots of success.				Your comments are appreciated.
17.	I don't agree with the statement that a substantial increase in traffic volumes in a residential area is what is to be expected in a fast expanding city such as George. Suburbs Loerie Park and Eden abutting the proposed new development are quiet, green suburbs with frequent visits from the Knysna Loerie and wild buck.	19 April, 2021	Craig van den Heuwel	Private individual	Your opinion is noted.
18.	Our roads in the area are of a very low standard with the George municipality actually stating that there are no funds available for upgrades but only for bare minimum repairs.				Various road upgrades form part of the development proposal - See Section 4.2.1.8 of the Scoping Report
19.	Loud noise from music and spectators from sports events is a major concern. A statement				The capacity of the George Law Enforcement will be explored further in the EIA Phase.

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	was made that existing bylaws will keep the disturbance down to a minimum but in reality this is not true. We in Loerie Park hear the night time music from Rosemore Stadium late into the night. Where are the bylaws. George does not have the law enforcement personnel available to police noise complaints of this nature.				
20.	With regards to water pollution of our towns only drinking water source. Reporting to the Department of Water Affairs after a spill has occurred is simply not acceptable. Prevention is the cure.				<p>Several mitigation measures have been considered for water pollution (See Section 4.2.3.1 of the Scoping Report):</p> <ul style="list-style-type: none"> <li>• Develop, implement and monitor catchment litter management and water quality strategy;</li> <li>• Ensure adequate provision of sanitation services;</li> <li>• Ensure adequate provision of solid waste management services;</li> <li>• Where possible make use of a SuDS treatment train to manage water quality;</li> <li>• Install local / regional litter traps (as suggested in the report);</li> <li>• Ensure that all attenuation facilities have adequate forebay's with extended attenuation to allow for adequate sedimentation; and</li> <li>• Develop a stormwater management plan that incorporates the management of peak flows, litter and water quality. Such a plan should incorporate a lifecycle costing of the required maintenance to ensure that adequate resources are available so that design, once implemented, can be adequately managed – and perform as intended.</li> </ul>
21.	George municipality cannot even control the spillage from the current sewer infrastructure. The last major spillage upstream on the Kat River				Upgrades to the sewerage infrastructure are included into the proposal, which should address any shortfalls currently experienced (See Section

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	caused by untimely sludge discharge from the Water Works in conjunction with peak sewer volumes in the sewer network.				4.2.2.4 of the Scoping Report).
22.	These spillage have lead to a massive influx of the cariba weed due to high phosphorus levels. Now you want to have a delevopement right next the dam?				
23.	Why not upgrade the current university?				As per Section 3.1.2 of the Pre-Application Scoping Report, more space is needed over the next 20 to 30 years as George expands and more students need a place for tertiary education purposes. As we enter the Fourth Industrial Revolution we will need more space for students, not only for traditional careers but for the careers that the Fourth Industrial Revolution will bring. In the future, without further expansion of education facilities current and future generations will have to leave George so that they can attend educational facilities in other Cities simply because those courses are not offered in George.
24.	Why have two right next to each other?				
25.	Why not use the area between George central and the airport? Surely less of an environmental impact.				There is very limited space between the center of George and the airport while still being within the urban edge. Certainly not a big enough area that is owned by the George Municipality.
26.	Having a higher density accommodation and higher traffic volumes will not improve the property volumes in the area where most properties are over a 1000 square meters.				Your comment is noted
27.	Doing an environmental assessment after the 2018 fires is a lowball. Many indigenous species in fauna and flora were wiped out and are only now starting to recover. So I believe that any meaningful observations could not have been made.				Your comment is noted. Additional studies are proposed for the EIA Phase of the process.

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28.	We take note of this plan and wish to note that the increased traffic and noise will change the current peaceful nature of our suburb, Loerie Park.	Ulrich Kahts	20 April, 2021	Private individual	This is noted and various mitigation measures have been proposed to address these impacts.
29.	Furthermore we wish to propose that a 2 meter wall be built around this development and that the entrance be moved to Meyer street or Madiba Drive				This option will be proposed to the engineer, who will determine feasibility.
30.	Regarding the proposed development around the Garden route dam. George is still one of the fastest growing cities in SA and as such I can recognise the need for more residential space. Most people who relocate here have trouble finding a home to rent or buy and stands for sale are quickly filling up. The Garden route dam is a prime piece of real-estate and I can understand the appeal of a development there. However I have a few concerns regarding the scope of the development especially the university.	Karin Bath	21 April, 2021	Private individual	Your comments is noted.
31.	My concerns are as follows: There are significant challenges regarding housing students and having a campus, together with a residential area. I have two sons at university. One in Gqeberha (PE) and the other in Stellenbosch. In the time they have been studying, there has been protest action at least twice a year, for reasons such as NSFAS not paying funds in time, demands that historical debt be cancelled, demand for free tertiary education and even issues such as campus security. At the Gqeberha (PE) campus the roads to the campus buildings are routinely blocked, sometimes with burning tires. No student or lecturer is able to get on or off campus and those				It is acknowledged that there may be protesting associated with the provision of the campus and student housing. Unfortunately, as you have mentioned, this is part of modern day social ills in South Africa and around the world and the extent of which in the next 1030 years cannot be predicted with any accuracy.



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	<p>who do want to go to class, are intimidated. Each time the academic or exam calendar has to be delayed. NMU has implemented a strategy where rewrites are done before start of class for the next semester, so students are unlikely to protest their exam results and if they do, the disruption will be minimal because classes for other students have not started yet.</p> <p>Whilst I understand the predicament many students face it is unacceptable to bar someone else from attending class, to become violent or destroy property. I recall a few years ago the fees-must-fall protests got so bad, at CUT the protesters set a guard house alight with the guard still in it!</p> <p>The protesting will not go away. If this happens, how will residents' safety be taken into account? How will they access their properties? What if the mob becomes destructive and starts looting the shops or destroying infrastructure?</p>				
32.	<p>These are "what if's", but looking at history, they are very possible scenarios. We just don't know how people will react in a threatening situation. Case and point, looking at the Brackenfell high school Matric farewell incident of last year, one can observe how quickly a situation can escalate into violence.</p>				
33.	<p>With all the class interruptions as a result of protest action, I believe more and more Universities are gravitating toward online-learning and moving away from on-campus teaching. With the way things are changing, I believe a University development of this magnitude is very short sighted indeed.</p>				<p>At the beginning of the pandemic the "work from home and study from home" were seen by some as the solution to not only stopping the disease spreading but also the need for institutions of learning. We are now understanding both the upsides and downsides to the work and learn from home lifestyle. This includes such factors as the impact of students interacting with each other</p>

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					academically and access to the internet, computers and other learning tools. What works in first world situations does not always apply to third world countries. The need for “brick and mortar” institutions remains for many courses and degrees.
34.	Student housing integrated or close to residential areas and the dam wall. Students are loud and drink/party, especially over weekends. Who will want to buy a house next to a student Res? And a student Res located next to the dam wall? I can just imagine what kinds of trash will be thrown into the water, not to mention drunken students vomiting or daring friends to jump over the wall. And a disaster waiting to happen, when someone decides on a midnight swim whilst intoxicated.				Your concerns are noted and mitigation measures will be further explored by the Socio-Economic Specialist in the EIA phase.
35.	My son in Gqeberha (PE) lives in a private student hostel on the edge of a residential area. He often says how the neighbouring residents complain of the noise especially over weekends. My son in Stellenbosch lives in a private flat in between the university's male and female residences. He again says the hostels are often chanting/ yelling at each other in the middle of the night. He laughs it off but says it is very bothersome when he has to study or sleep because of an early class.				
36.	This is just the nature of students, and we can laugh it off as student antics, but imagine you have paid top dollar for your stand (I expect they won't be cheap) and every weekend you are “entertained” by the neighbouring students. Or they liberate your home of its more mobile assets. I would not want to live in an estate and				

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	have to safeguard my property from my neighbours.				
37.	Which university will occupy these huge facilities? Will it be a University of Technology or FET Collage like, SCC? Will it be a more established University like NMU or Stellenbosch? Or will it be a smaller private University like Akademia or Varsity Collage?				<p>George Municipality owns the land in question, Remainder of Erf 464, George and there has been interest and inquiries from various institutions to establish tertiary education institutions in George. The Municipality is preparing the land and securing development rights through the town planning and environmental authorisation processes.</p> <p>After the development rights are secured, the Municipality will follow a process endorsed in terms of the provisions of the Municipal Finance Management Act and Municipal Asset Transfer Regulations to call for proposals from suitable developers and partners to facilitate the process.</p>
38.	<p>If a University of Technology it means more NSFAS issues, which are not the fault of the University but inevitably spill over into the establishment, as seen with the recent protests of SCC in Mitchell Street.</p> <p>If a more established University, I very much doubt that they will be wanting to invest in such a huge development. Each year there is more and more demand for free education and historical debts to be cancelled. The universities are struggling to keep afloat as is. Who will want to take on the financial burden of a new campus? If a Private University, this massive complex will be far too large for them to support.</p>				
39.	What will then become of the infrastructure and student housing? Will it become a big white elephant like the hospital building in Stilbay's "Duine" development which is standing empty because they cannot find doctors to take up residency?				
40.	The hotel. I do not see the need or business case for another hotel in the area. The hotels we do have here are already struggling as is. For example Far Hills Hotel has tried to increase occupancy by making rooms available as student housing. Or Pine Lodge that went up for sale				<p>The Hotel and Business area were previously approved by DEA&amp;DP and the Minister of Local Government.</p> <p>As per Section 4.2.1.4 of the Comments and Responses Report, the inclusion of these uses has</p>

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### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	recently.				
41.	Similarly why would any tenant take up residency in the commercial area if the Garden route mall is only 5 min away? Our inner city, is struggling to survive because of the great pull the mall has on buyers, I do not see how a commercial area will be sustainable.				<p>been well argued in previous applications and the potential benefits which can be extracted from these uses can now be further enhanced through the inclusion of the proposed additional land uses. It is envisioned that the inclusion of hotel and business facilities will attract a variety of users and will become an important role player in stimulating the local economy. The inclusion of hotel and business facilities would act as a major attraction use which will not only attract the wider community, but which will also ensure that the site is utilised at all times of the year. In addition, these facilities will greatly encourage the integration of various income levels and will provide pedestrian activity which would in turn support other uses on the site. A commercial sector will link the hotel area and the waterfront area to create a hub for students and citizens alike.</p> <p>The strategic location of these proposed facilities would extract the natural beauty which is harnessed on this site and thus has the potential to attract investment into surrounding land uses. The Hotel area can be linked to the business area with a pedestrian bridge and this precinct could also include a Business School and possible tourism related training facilities.</p>
42.	The sports fields. Once again we already have excellent facilities in George that are not utilised. I live near the George stadium, even in Post Covid times the stadium is not really used except for the odd rugby match. And what about the tartan athletics track that was supposed to be built close to Rosemore stadium? The George Herald article about it being out on tender was in 2018, nothing has happened since. Conville				<p>The proposed sports facilities would be shared by the various institutions on the site and will be open to public use at dedicated times. Their need will be further explored by the Socio-Economic Specialist in the EIA phase.</p>

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	swimming pool which is a 50m Olympic size pool is standing dormant. These are just a few of the existing facilities that are totally underutilised. Why would new facilities be any different?				
43.	In conclusion. Whilst I recognize the appeal of developing the area, I do not see the viability for such huge infrastructure. It all seems to me like a cloak-and-dagger way of rezoning the area for some kind of residential development.				Your comment is noted but the concept is a university precinct and not a pure housing development.
44.	I will support a medium sized residential development. There is a need for it, and I do not believe the environment or aesthetic of the area will be too much impacted if one would develop the residential area as per the proposal. I myself would probably consider purchasing a stand in such a development but not if the plans of this magnitude were implemented. In addition to the above mentioned points, the University-Retail-Hotel complex will most certainly be an eyesore and have a huge impact on our beautiful natural heritage, not to mention the additional pressures on our sewage system and the copious amounts of water that will be needed to irrigate all the sports fields. I trust the right decisions will be made in regards to the needs of our growing community and the aesthetic of the area whilst using common sense.				<p>Your support of the residential portion of the development is noted.</p> <p>The visual impact of the development and proposed mitigation measures will be further explored by the Visual Impact Specialist in the EIA phase.</p>
45.	SEEMS LIKE THIS SUBJECT COMES UP EVERY FIVE YEARS OR SO. THE DAM AREA HAS BEEN UTILIZED BY THE GEORGE COMMUNITY FOR RECREATIONAL PURPOSES FOR THE PAST 25 YEARS THAT I HAVE BEEN LIVING HERE. MOUNTAIN BIKING,HIKING,FISHING, RUNNING PICNICING,SCHOOL WALKS AND WHAT EVER	Paul Godwin	21 April, 2021	Private individual	The historical use of the area is noted.

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### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	OUTDOOR ACTIVITIES YOU CAN THINK OF.				
46.	THERE HAVE BEEN DEVELOPMENT PROPOSALS AT VARIOUS OTHER SITES WHICH STAND OPEN THAT ARE FAR MORE ACCESSABLE TO THE GENERAL PUBLIC AND ARE FAR MORE SUITABLE FOR THE USAGE THAT IS PROPOSED. THE GARDEN ROUTE DAM IS A GEM IN GEORGES CAP THAT NEEDS TO BE TREASURED FOR THE USE OF LOCALS AND TOURISTS ALIKE				The proposal aims to improve access for cyclists, trail runners, walkers and canoeists, fishermen, amongst others to the existing recreational areas around the dam. This area has historically been used by the public as a recreational area and the proposal aims to enhance this aspect. As such, an Open Space of approximately 67ha is proposed around the development area to be utilised for these uses.
47.	I would like to raise the following concerns and with this strongly oppose the development of the proposed site at the George dam. 1. Carbon footprint: This development will just enlarge the carbon footprint in an already ecological sensitive area, taking into account the number of people facilities like rugby, athletic and soccer stadiums as well as business zones will draw. This is absolutely counter productive to what we as a nation are trying to work towards in making this footprint smaller.	Helen Burnard	25 April, 2021	Private individual	The inclusion of renewable energy sources and green building principles as part of the design of the overall development will be investigated in the EIA Phase to address carbon concerns.
48.	2. Ecological sensitive area. How many times before have we heard promises of “sensitive areas” that will be protected as regards to Fauna and Flora. We all know this rarely happens and once the developers have achieved their goal there is little concern for what remains. Yet another sensitive area destroyed.				An Open Space of approximately 67ha is proposed around the development area, the management of which will be a condition to the environmental authorization.
49.	3. The proposed development is not the only in the area, not far from this proposed development another phase will be added to the already existing Groenkloof development adding to the devastating impact on the area.				The surrounding developments are noted.
50.	4. Social problems. We all know that				Development in George is inevitable, and this

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	developments cause job seekers to stream to areas once it is public knowledge of such developments. The same will happen to George as has happened in Mossel bay where masses of people flocked to the area in a hope of a job adding more pressure on the informal housing sector and socio-economic problems of the area. For sure we know crime in the broader George area and specifically the development area will increase a hundred fold. This has been proven over and over again.				process aims to ensure that the negative impacts of this development are minimized where they can be. Informal housing and socio-economic issues in the broader context would need to be addressed by the relevant municipal Departments.
51.	5. I have been in the tourism trade for more than 20 years (in all levels) and it blows my mind that "Tourism related training facilities" will be part of the development. Once again the world and tourist are turning to ECO tourism and seeking out such spots not built up, shopping malls and housing sectors in and close to ecological sensitive areas. It is actually laughable that by approving this development you will be destroying the very reason why tourists both local and International come to this part of the Eden district in George.				<p>An Open Space of approximately 67ha is proposed around the development area.</p> <p>As per Section 3.1.6 of the Comments and Responses Report, it is agreed that there will be a change in the sense of place of the Garden Route Dam area, as confirmed by the Visual Impact Assessment prepared by Paul Buchholz in August 2019.</p> <p>As a result of the development, the "natural beauty" of this area will be decreased as there will be less natural vegetation than there currently is on site. This has been identified as one of the biggest impacts which would take place as a result of this development. Unfortunately, the change in the sense of place in George is a daily occurrence. The entire area is changing rapidly as more and more people move from the economically and security challenged areas of our country to the Garden Route and, more specifically, George. This is illustrated by areas that now home the Garden Route Mall, Kraaibosch and Groenkloof Retirement Village, which were forestry plantations 20 years ago.</p>

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### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

					<p>Specialists proposed both ecologically and aesthetically motivated methods to mitigate the effect of the loss of the natural beauty of the area. The enhancement of open spaces and the strategic placement of sports fields and other infrastructure has been used to mitigate these impacts.</p>
52.	<p>6. Is another commercial shopping area needed in George that will especially be impacting on the dam. It is widely known what impact the drought in George had a couple of years ago and adding this development will just put more pressure on the availability of water sources in the area. Secondly the existing CBD area of George is in great need of “new life” Many old/historical buildings are empty why not work with the already available infra structure that exists. It will be a win-win situation for all.</p>				<p>The Hotel and Business area were previously approved by DEA&amp;DP and the Minister of Local Government.</p> <p>As per Section 4.2.1.4 of the Comments and Responses Report, the inclusion of these uses has been well argued in previous applications and the potential benefits which can be extracted from these uses can now be further enhanced through the inclusion of the proposed additional land uses. It is envisioned that the inclusion of hotel and business facilities will attract a variety of users and will become an important role player in stimulating the local economy. The inclusion of hotel and business facilities would act as a major attraction use which will not only attract the wider community, but which will also ensure that the site is utilised at all times of the year. In addition, these facilities will greatly encourage the integration of various income levels and will provide pedestrian activity which would in turn support other uses on the site. A commercial sector will link the hotel area and the waterfront area to create a hub for students and citizens alike.</p> <p>The strategic location of these proposed facilities would extract the natural beauty which is harnessed on this site and thus has the potential to attract investment into surrounding land uses.</p> <p>The Hotel area can be linked to the business area</p>



## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

					with a pedestrian bridge and this precinct could also include a Business School and possible tourism related training facilities.
53.	Why choose and target this sensitive area when there is land available in the George/ Eden district that will not have this negative impact. Government is encouraging such developments close to areas where it will have a greater impact on the community both economic and social (previously disadvantage communities) Why are the Pacalts and Gwaing area not been considered for such development?				This site is located within the urban edge and is within the parameters of the Spatial Development Framework for George.
54.	Referring to the article in the George Herald dated 22 April 2021, I wish to place on record my concern regarding the GR Dam development. We live on Madiba Drive and there is already a large amount of traffic using this road. The high volume of cars and heavy traffic is constant, especially at peak times and even over weekends. Traffic from the neighbouring school, the existing university, the surrounding suburb, and the Seven Passes Road as well as pedestrians (without safe pavements) use this road.	Marilyn Scott	27 April, 2021	Private individual	<p>The site will be served by three accesses, as follows:</p> <ul style="list-style-type: none"> <li>• Access 1 along Stander Street (opposite Arthur Bleksley Street);</li> <li>• Access 2 along Saasveld Road (between Meyer Street &amp; Access 3); and</li> <li>• Access 3 along Saasveld Road (opposite Road 1)</li> </ul> <p>The Traffic Impact Assessment has identified upgrades required to accommodate the additional traffic volumes.</p>
55.	It is unbelievable that Stander Street (a narrow suburban street with no hope of widening) and Madiba Drive will be the only access to this huge development. With construction vehicles using these two roads during the construction phase and later the additional traffic that the residential, university, hotel and retail developments will bring I would like to know if there is any plan to develop other access roads.				
56.	I have no objection to the development should it be passed by council, but I would like my				
					Your concern regarding the traffic is noted and will not exceed the norms for a residential area.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	objection to the inadequate road access be noted. The traffic noise is already disturbing and will be unbearable if the volume of traffic increases.				
57.	Thanks for your notices. Unfortunately I'm unable to download and print the necessary documents. Are there hard copies available anywhere in George please?	Muriel Hau Yoon	30 April, 2021	Private individual	Due to the repeated closure of libraries, no hard copies were placed in public areas.
58.	1. Your document 21/GRD/POSTAPP/DSR/04/2021 dated April 2021 refers.	Lyle Martin	4 May, 2021	Western Cape Government: Department of Transport & Public Works- Roads.	
59.	2. Both Main Road 2 (MR00002; N9 – Knysna Road) and Main Road 355 (MR00355; Saasveld Road) are Proclaimed Provincial Roads that are affected by the proposed development. George Municipality acts as the Road Authority of both Proclaimed Roads, with this Branch being the Approving Authority in terms of Road Ordinance 19 of 1976.				The authority of the roads is noted.
60.	3. From an environmental point of view this Branch offers no objection to the proposed development, provided that this Branch is offered the opportunity to comment during the land use application; at which stage this Branch will require George Municipality's Department Roads' positive recommendations towards both the traffic improvements and any external services that may affect the provincial roads in that vicinity.				The Department will be consulted as part of the land use application.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

61.	Thank you for the comprehensive report. I just wish to comment as a house owner (Arthur Bleksley 26, Loeriepark), George resident and nature lover.	Manie Engelbrecht	04 May, 2021	Private individual	
62.	It is clear that allot was invested in this report. It is evident that priority is given to the socio-economic impact, tertiary education through this project. I however get the impression that longer term goals such as nature conservation are not given equal priority. If you develop this land, then it will be lost for future generations.				While a portion of the land would be lost to development, 67ha would remain as Open Space,
63.	I have a serious concern with regards to the provision of housing through this project. The proposed housing will be very close to my property. I have a serious concern with regards to the increase of noise levels, increase of traffic, lack of privacy, loss of tranquillity and the permanent loss of a beautiful nature setting. Did you consider what impact student and university life will have on the area?				These impacts have been taken into account in the Scoping Report and will be further investigated in the EIA Phase.
64.	Did you investigate "University cities" like Bloemfontein and the impact student accommodation and student life had in such areas? Please do a study.				The Socio-Economic Baseline Report included Case Studies from Stellenbosch University as well as the University of North West, Potchefstroom.
65.	We are going to loose a very valuable nature asset if you develop this land. I do not agree that the building process will have minimal impact,				Your opinion is noted.
66.	I do not agree that this development will result in an increase in property value- I need to be convinced. Based on what I have seen in similar settings (Bloemfontein University Campus and surrounding areas close to the campus)- the possible future picture of this development does not look good.				The anticipated increase in property value is based on the case studies included in the Socio-Economic Baseline Report.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

67.	Did the developers consider to develop Saasveld campus rather, to upgrade NMU facilities rather. Does NMU use all the buildings facilities?				It is foreseen that the new Campus/tertiary institute and the existing NMMU Saasveld Campus could complement and support each other, as both facilities could offer different courses and degrees.
68.	Lastly, did you accommodate the access of cyclists and runners, hikers through this property. The outdoor enthusiast community of George values the dam area. During the COVID pandemic the dam provided and is still providing a nature haven, nature escape, breathing space, hiking/ running/ mountain biking route for many residents. It will be a sad day if we would to loose this. Please carefully consider this reply .				As per Section 3.1.1 of the Comments and Responses Report, the proposal aims to improve access for cyclists, trail runners, walkers and canoeists, fishermen, amongst others to the existing recreational areas around the dam. This area has historically been used by the public as a recreational area and the proposal aims to enhance this aspect. As such, an Open Space of approximately 67ha is proposed around the development area to be utilised for these uses.
69.	It is clear that an enormous amount of work and expense has gone into the preparation of these documents but regrettably they have failed to convince that the development will not have a significant adverse effect on the area.	Mike Viljoen	07 May, 2021	Private individual	Your opinion is noted.
70.	It is just too risky to entrust an ecologically vulnerable site like this to a mass influx of human beings whose behaviour appears to be deteriorating worldwide and especially in countries like South Africa where greed, corruption and a disrespect for law and order and for the environment is prevalent.				Your opinion is noted.
71.	I am therefore not in favour of the development and would prefer the site to be proclaimed a nature reserve once and for all with forest walks and picnic areas where families can safely enjoy the outdoors.				The proclamation of the entire area as a nature reserve is not practical from a financial point of view as the Municipality is already under pressure to ensure the current open spaces are maintained. This area is withing the urban edge and therefore the Municipality needs to use the area other than for open space. The current proposal allocates 67ha to Open Space to be utilized for walking,

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

					cycling and public use.
72.	A small entrance fee would be quite acceptable. Unfortunately our surrounding forests are not safe because of the threat from human predators.				Through the establishment of more formal paths and walkways which do not currently exist, the safety of the area will be improved. Local hiking, running, biking clubs and fishing clubs would be able to assist with monitoring the trails and feeding any issues back to the Municipality to address.
73.	Thank you for this notification and subsequent corrected Appendix E2 circulated 30/04/2021 I have read through Appendix E2. From the comments made by the interested and affected parties it is quite clear that the vast majority of people are very opposed to the development and there is a common thread to the concerns and objections raised.	Dean Chandler	08 May, 2021	Private individual	Your comment is noted.
74.	The report addresses a number of the concerns with technical jargon. However, the practical and sustainable implementation of all of the proposed management, mitigation and augmentation measures is where the challenge lies.				Noted, and therefore the EMPr needs to contain mitigation measures in order to ensure this.
75.	It is all well and good to have a lot of theory written down to address the concerns but implementation is another matter altogether. There are many examples of failures of the existing infrastructure which illustrates this. For example, frequent outflows of raw sewerage into the Garden Route Dam which has resulted in the water quality being reduced to virtual disaster status in the vicinity of the Eden sewer pumpstation.				Mitigation measures include into the report become part of the Environmental Authorisation, which is a legally binding document. While it is impossible to guarantee that there would be no negative impacts, the Applicant is held legally responsible to uphold the conditions of the authorization.
76.	The magnitude of the proposed Garden Route Dam development will most certainly exacerbate and negatively impact on all				

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	aspects of the area and in turn on the city as a whole. The responses in a report are absolutely no guarantee of preventing this inevitability and this is where the concern lies. It seems pretty clear that the vast majority of the people do not want this development				
77.	Herewith please find my comments on: Post-Application Draft Scoping Report (SR) and Plan of Study for Environmental Impact Assessment (POSEIA) For the PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE.	Eugene Knottenbelt	11 May, 2021	Private individual	
78.	<p>1. BACKGROUND</p> <p>George municipality has throughout the years proposed various proposals for the development of the above section of land. These have been vehemently opposed by the public, especially those who reside in residential areas adjacent the land with good reason therefore. The George Town Planners have for decades come up with various schemes, many of which have been shelved and some of which were implemented with unsatisfactory results. The previous proposal included residential erven, group and town housing units and flats as well as a hotel and a tourism business site.</p> <p>The EA only approved the hotel and tourism business front. This approval was met with dismay by the public who have to date been awaiting moves by the municipality to attempt implement such so that opposition to such could again be mobilised. Already the ruling party is under threat, especially in the affected areas! We</p>				Your background statement is acknowledged.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	would not stand idly and let our environment be destroyed, our only water resource be polluted as elsewhere in the country.				
79.	<p>2. CURRENT DEVELOPMENT PROPOSAL</p> <p>General</p> <p>The latest proposal for a University Precinct Development and Associated Infrastructure at the Garden Route Dam is similarly an indescribably, ludicrous proposal. Apart from the University precinct the proposal includes, inter alia,</p> <ul style="list-style-type: none"> <li>o Residential Group Housing(3x),</li> <li>o Apartments, flats, Student Housing (4x),</li> <li>o Free Standing Dwelling Houses (91x)</li> </ul> <p>This would appear to be in conflict to the earlier EA which excluded the proposed residential erven, group and town housing units and flats! Why would the DEA&amp;DP now approve the above?</p>				<p>The previous proposal failed to show integration of social, economic and environmental factors in terms of its planning and did not adequately address the needs of the community in terms of sustainable development.</p> <p>The revised layout now being proposed aims to address these issues.</p>
80.	<p>Origin of Development Proposal</p> <p>On page 16 of the Report it is stated that the Municipality has received a number of requests for areas where a university precinct can be established. I have previously requested that the identity of those making these requests be disclosed for obvious reasons.</p>				<p>The Municipality has not disclosed the individuals and organizations who may be interested in developing the university precinct.</p>
81.	<p>Comments on The Pre-Application Draft Scoping Report</p> <p>I submitted comments on the Pre-Application Draft Scoping Report in August 2020. In this report It is stated that comments received from IAP's have been considered in this report. I disagree and am of the opinion that many have been ignored while some wording changes have been made to deviate attention.</p>				<p>Your opinion is noted.</p>

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

82.	As such my previous comments sent to you are valid and relevant to this report and be recognised by Sharples as such and included in the evidence forwarded to the DEA&EA and to the municipality. Further comments and summary following below are thus complimentary to earlier comments.				All previous comments have been responded to in the Pre-Application Comments and Responses Report and circulated to all I&APs and Authorities.
83.	I believe it is part of the selected strategy to have the public comment on the Pre-Application Draft Scoping Report knowing that they will believe that their comments have been given serious consideration and will reach the DEA&EA when this will, in all probability, not be the case.				
84.	<p>Further Comments</p> <p>University Precinct</p> <p>George has many colleges providing education in various field as well as a satellite campus of the Nelson Mandela University.</p> <p>The statement under Strategic Goal 1 on page 32, first bullet “To identify an educational and research hub and to facilitate the continued growth of NMMU in George” is an example of the wording changes. What utter nonsense! I challenge you to present any evidence to show that there has been communication in this direction with the NMU. On the contrary the NMU has the potential to meet all the educational needs for this part of the Western Cape, knowledge, expertise, and space for expansion!</p> <p>Since Covid, most tuition worldwide has changed to virtual learning. Campuses are shrinking! Lecturers working from home!</p>				<p>It is foreseen that the new Campus/tertiary institute and the existing NMMU Saasveld Campus could complement and support each other, as both facilities could offer different courses and degrees. The ability of existing institutions to meet all current and future educational needs will be further explored by the Socio-Economic Specialist in the EIA phase.</p>



## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

85.	Effect On Adjacent Residential Neighbourhood The area proposed for development is a residential area, Eden and Loerie Park. The immediately affected are accessed by Stander Street, Arthur Bleksley Street and Meyer Streets. The development of a university, residences, playing fields, Science Park as well as the business units will irrevocably change these residential areas though major increases in traffic (inclusive of busses, trucks, delivery vehicles), traffic noise, pedestrian safety, and general peaceful environment.				The increased in Traffic and pedestrian safety have been taken into consideration in the Scoping Report and will be further elaborated on in the EIA Phase.
86.	The roads are too narrow and the pavement structures are not strong enough for the additional traffic volumes and loads. They are already in a stressed condition. There is no space for formal sidewalks and stormwater drainage is poor. Should this development proceed the value of the residential properties in Eden and Loerie park will nosedive. The very reason why people chose to purchase houses in these suburbs, Peace and Quiet will be gone. Eden will be no more.				Various infrastructure upgrades are included into the development proposal. These include roads and stormwater upgrades.
87.	Situated along Stander Street is a retirement village, a Montessori school. The area has many retired persons while the development area is used by many persons for cycling running, walking, canoeing, hiking, etc. To access this and the hiking trails across the dam will require traversing the university campus which to many will be a major deterrent.				The 67ha of open space is distributed around the university hub, allowing access from all sides without having to traverse the actual campus area.
88.	Pollution The Garden Route dam is the sole source of drinking water for the whole of George. Already it is under threat from leaking sewage pipes from				Various infrastructure upgrades are included into the development proposal. These include sewerage upgrades. In addition, a number of pollution mitigation measures are being proposed.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	as far as Denneoord ending up in the Kat River and being transported (with the solid matter filtered from the raw water at the purification works) into the dam. There are regular spillages at the various pumping stations. The smell of sewage is ever evident at the one along Saasveld road.				
89.	In Eden where I am resident there are constant blockages resulting in leakage from the manholes. The municipality sometimes takes days to attend to them. The infrastructure cannot cope with the additional loads that will be imposed on them.				
90.	To even consider any formal infrastructure such as the proposed hotel and business units is pure madness. What is a Science park?				Your opinion is noted. Science parks are property-based developments that accommodate and foster technological growth, where governments, universities and private companies may collaborate on innovation and research projects.
91.	What hidden consequences lie behind these two words? What refuse creating, noise generating, possible pollution creating organisation is planned here?				
92.	Why here , next to the GR Dam? Should this not be in George's industrial area? Witness what is happening elsewhere in the country, Tshwane, the Vaal dam, Centurion Lake!				Section 3.1.2 of the Pre-Application Scoping Report addresses this concern.
93.	Municipal Management George Municipality's service delivery is deteriorating at an alarming rate. The water and sewage infrastructure, the road, even the street light posts are failing. The municipality does not have the required technical skills or experience among its staff to attend to these matters and everything is being done by contractors. These are appointed according to BEE status and not				Your concerns regarding service delivery are noted.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	technical capability. Just view the current situation!				
94.	Even refuse removal is a “challenge”, not to talk of water pipe repairs/replacement, sewage leaks/blockages, road repairs, clearing of stormwater drains. Yet new traffic markings are done, over the potholes!				
95.	The Garden Route dam is infested with Kariba weed. It has been sprayed but the dead weed is floating on the surface, especially in the dam wall area. Maybe a tourist attraction? No attempt is being made to remove it, When the water levels were lowered to facilitate the construction of the new spillway , eradication of alien growth around the whole area was to take place and the public was warned t stay clear of the area. This did not take place at the time and is only being done now, to the detriment of public activities such as cycling, hiking and jogging. It also presented an opportunity to remove vegetation that was below the new high-water mark. This was not done rendering any aquatic activity along the water’s edges dangerous. Tourism friendly?				Your concern regarding the current effect on tourism is noted.
96.	Regarding alien growth the municipality neglected to address the growth of aliens such as wattles after the recent fires. They also were negligent in the handling of the fires and “voorbrande” which got the better of them. Over the years environmentally conscious residents complained about the spread of Pampas grass and Lantana. Just look at the current situation! There are complains about lack of funds! Now we have people sitting in their offices doing nothing, managing nothing, yet more and more are being appointed just calling for increases.				Alien invasive management is included into the proposal.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

97.	<p>Tourism</p> <p>Tourism is almost non- existent. George has never been successful in promoting tourism. Oudtshoorn, Knysna, Sedgefield, Mossel Bay have succeeded but Geoge not. Hotels are bankrupt (before Covid), businesses are dying. (before Covid). A major contributor is George's Town Planning Department and the officials. Insider trading, self-enrichment, nepotism all prominent including professional politicians. Assisted by some businessmen who "own the town". Also, since when has a catchment dam without safe swimming and boating facilities been a tourism attraction?</p>				<p>Your statement is noted, however, is not supported. Please see Sections 4.2.1.3 and 4.2.1.4 of the Scoping Report.</p> <p>The proposal aims to promote George as a sports tourism and business destination.</p>
98.	<p>3. SUMMARY</p> <p>The proposed development of a UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE will be a disastrous development which will hasten the downgrading of this city to that of a failed one and it is a shame that Sharples are being party to such.</p> <p>If this goes ahead a name change is proposed: SHARPLES ENVIRONMENTAL DESTRUCTORS!</p> <p>The "No Go " option is thus my recommendation.</p>				<p>Your opinion is noted.</p> <p>Sharples Environmental Services are appointed to conduct the Environmental Impact Assessment Process, which is informed by a number of independent specialists in a range of fields. We are independent and not able to agree with every I&amp;AP. Fortunately the other I&amp;APs who send in comment do not resort to slander. Your name calling is not appreciated and is unwarranted.</p>
99.	<p>Herewith concern about the proposed sports fields, hotels, housing and university on the remainder of erf 464:</p>	Suléne Brand	11 May, 2021	Private individual	
100.	<ul style="list-style-type: none"> <li>Access for hikers, cyclist &amp; family walking will be cut off and restricted. As with the University surrounding nature and hiking trails, gates will be erected and free access to this area could be limited and cut off as per</li> </ul>				<p>The proposal aims to improve access for cyclists, trail runners, walkers and canoeists, fishermen, amongst others to the existing recreational areas around the dam. Restricted access and gates are not foreseen.</p>

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	their wishes as the university cut off access through gates during lockdown level 1-3 for recreational and open air activities.				
101.	• No access (off from tarred roads) to hiking and mountain biking trails in the mountains during construction (as happened with the construction of the new dam wall)				Access to the existing hiking and biking trails will remain open, as long as safely allowed during construction.
102.	• During lockdown this dirt road was the only access for cyclist to trails as the University is closed for access, how will access be gained if the University is for some reason closed again or closed in future with anyone without a student card?				The proposal aims to improve access for cyclists, trail runners, walkers and canoeists, fishermen, amongst others to the existing recreational areas around the dam. Restricted access and gates are not foreseen
103.	• This dirt road is currently a big attraction for families and active people to walk to the dam and get exercise with their dogs and kids on bicycles, as well off any tarred roads as a safe environment for family and kids to play and enjoy the "Garden Route atmosphere".				This is noted.
104.	• The sport stadiums causes a lot of noise for residential homes around the area, as well as peace disturbance when hiking in nature.				While more people in the area would result in an increase in noise, this is normally at an acceptable level. There would be noise associated with soccer, cricket or other sporting games but given the size of the site in question it is unlikely that this will noise would reach unacceptable levels at current surrounding houses. There are also bylaws in terms of noise that have to be adhered to and to date the City of George has been successful in ensuring that excessive noise generation is dealt with in a timely fashion.
105.	• Currently sewerage are running into the				Sewerage management measures are included into the proposal, which deal with capacity issues as

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	dam (and not getting resolved - kariba ) that is a very sensitive area - this development will increase the risk of sewerage spills and littering into the dam supplying drinking water to the				well as emergency situations.
106.	• Currently music and sport can be heard from the university to across the dam area when hiking. although the current sport facilities is probably 7km (as the crow flies) away, what if the sport facilities are less than 1km away?				There are also bylaws in terms of noise that have to be adhered to and to date the City of George has been successful in ensuring that excessive noise generation is dealt with in a timely fashion.
107.	• Part of the garden route's attractions are these open areas for hiking and enjoying the beauty it has to offer.				The proposal includes retaining 67ha of open space surrounding the university precinct, which would assist with keeping the sense of place.
108.	GARDEN ROUTE DAM DEVELOPMENT APPLICATION TO REZONE PORTION OF Erf 464, and extend the Urban Edge for a proposed tertiary educational and residential and commercial development.	Lynne Thompson	11 May, 2021	Private individual	
109.	COMMENTS: 1 WATER: This adds to the increase in demand for water and other Municipal infrastructure which is showing signs of being degraded on a regular basis.				Various infrastructure upgrades are included in the proposal. These cover water, sewerage and stormwater management.
110.	2 SEWAGE: Firstly, the infrastructure is strained and not coping with the increased population.				
111.	Secondly, as is seen at Victoria Bay, Ballots Bay and Herald's Bay, where there is a concentration of people, inevitably the sewage system fails and runs into the rivers and the sea. This has also occurred at the Garden Route Mall, and the new retirement villages in Kraaibosch fouling Modder, Swart and Kaaimans Rivers.				

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

112.	All the proposed developments will have a sewage system which, by its very nature, is liable to fail.				
113.	3 TRAFFIC: Only two roads will give access to the development. Stander Street is fully developed with a retirement village and the additional traffic is likely to cause problems. Especially at the junction of Stander and Heriot at the circle. Visibility at the yield point is poor, and non-Georgians tend to speed.				The site will be served by three accesses, as follows: ▪ Access 1 along Stander Street (opposite Arthur Bleksley Street); ▪ Access 2 along Saasveld Road (between Meyer Street & Access 3); and ▪ Access 3 along Saasveld Road (opposite Road 1).
114.	Thank you for the opportunity to comment on this project. As a recent immigrant from Gauteng to George I found the reports interesting to read. This information inspired further research about the development of George Municipal Area (GMA).	Uwe Putlitz	14 May, 2021	Private individual	
115.	1. I could not find a (published) masterplan for development in the GMA;				The George Local Municipality Spatial Development Framework (2019) should be consulted.
116.	2. The population of the GMA has increased significantly by the relocation of up-country folk along the Garden Route mostly in new residential estates as well as in established suburbs;				This is noted.
117.	3. the Garden Route is one of the few areas in the country where the building industry is busy with almost too much work!				This is noted.
118.	4. From press reports the existing utilities infrastructure is only just coping with not infrequent service interruptions due to overload and/or insufficient maintenance, and some subversive activity;				Various infrastructure upgrades are included in the proposal. These cover water, sewerage and stormwater management.
119.	5. The Aurecon reports do not satisfactorily refer to the upgrading and extension of the municipal infrastructure services, or the funding thereof.				These reports will be updated in the EIA phase.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

120.	From the above: 1. An unquantified but real demand for residential accommodation from the 'affordable' to the 'luxury' is evident;				This is noted.
121.	2. Providing additional land zoned for residential accommodation should not be restricted only to the Garden Route Dam Precinct;				Your comment is noted.
122.	3. No justification is provided to establish a new university – the cost to establish such a new facility far exceeds the cost of extending an existing university with a credible academic track record like NMU at Saarsveld – One must conclude the 'university' provides an "excuse" to develop the area around the Dam.				Section 3.1.2 of the Pre-Application Comments and Responses Report addresses this issue.
123.	4. I am not opposed to development – I would like to see a "masterplan" for the GMA including the Dam;				The George Local Municipality Spatial Development Framework (2019) as well as Section 2.3.11 of the Scoping Report should be consulted.
124.	5. Any future development around the Dam must exclude direct access to the water's edge from individually owned erven. The only exception should be facilities related to water-sport activities and the public safety.				This is the current proposal. No individual residential erven are located adjacent to the dam.
125.	I must conclude: 1. There is no (published) masterplan for the George Municipal Area;				The George Local Municipality Spatial Development Framework (2019) should be consulted.
126.	2. In the absence thereof development around the Dam as proposed is a knee-jerk planning reaction;				
127.	3. Consequently the reports appended to the Aurecon Report are interesting but not relevant! In short, the Garden Route Dam Development Project has no 'bestaansreg'! With kind regards				
128.	COMMENTS ON THE POST-APPLICATION DRAFT	Melanie	14 May,	Department of	



## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	SCOPING REPORT (SR) AND PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT (POSEIA) PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE	Koen	2021	Environment, Forestry and Fisheries: Forestry Western Cape	
129.	Forestry is responsible for the implementation and the enforcement of the National Forest Act (NFA), Act 84 of 1998 as amended and the National Veld and Forest Fire Act, Act 101 of 1998 as amended (NVFFA). Thank you for giving Forestry this opportunity to comment on above application.				Forestry's responsibility is noted.
130.	1 Forestry studied the supporting documents for the above mentioned application and the following points related to Forestry's mandate i.e. the implementation of the NFA are applicable				Noted
131.	a. According to the report and information provided most of the area is disturbed with remnants of indigenous forest patches occurring				This is noted.
132.	b. Forestry request that a 20-30m buffer be allowed between the forest ecotones and any developmental proposal				The inclusion of this buffer will be investigated in the EIA phase.
133.	c. That indigenous forest patches/ as well as protected/ indigenous trees be incorporated (through detailed surveying) into any developmental proposal/ design- and be retained/ protected and indicated as no-go areas. That indigenous forest patches/ as well as protected/ indigenous trees be GPS'd and their exact position be incorporated within the development design footprint as no-go areas in order to ensure protection.				This condition will be included into the EMPr and will be conducted prior to the completion of the detailed designs.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

134.	2 Forestry reserves the right to revise initial comment based on any additional information that may be received or obtained.				This is noted.
135.	COMMENTS: Post-Application Draft Scoping Report (SR) and Plan of Study for Environmental Impact Assessment (POSEIA) PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE Please accept the comments from the recently rejuvenated Garden Route Dam Action Group. It is acknowledged that GARDAG has not registered as an interested party, but Desireé du Preez and Pauline Lourens have registered in their private capacities	Desireé du Preez	15 May, 2021	Garden Route Dam Action Group	GARDAG has been registered as an Interested & Affected Party.
136.	Citizens of George concerned with the condition of the only source of drinking water for George, as well as other water environments that are important recreation areas, came together under the auspices of GARDAG which was active in George previously. Our comments will therefore focus on the impact of the proposed development on the water quality of the Garden Route Dam.				This is noted.
137.	It is noted that the impact of the preferred alternative on water quality has been rated as MEDIUM NEGATIVE AFTER mitigation, which is concerning. The Plan of Study for EIA does not detail assessment of the effectivity of the mitigation measures or methods to reduce the impact.				Your concern is noted.
138.	The potential impact of drainage of the proposed alternative would be via four drainage systems				The identified impacts are noted and have been included where valid in the assessment phase

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	that are not currently subjected to anthropogenic impacts and function in a near natural manner. The impacts are identified as: Urbanization of the catchment and its associated stormwater runoff is a threat to freshwater biodiversity not only because of the increased hydrological disturbance and habitat loss, but also because of an increased delivery of pollutants to streams. These pollutants often do not have a chronic effect on aquatic biota but their negative and collective effects may be realised over longer periods of time. The most problematic nutrients are nitrogen and phosphorus. Stormwater runoff from urban surfaces may include nutrients, pollutants, raw sewage and other domestic waste. The establishment of sewer pipes within and/or in close proximity to watercourses always poses a long-term threat to the water quality and ecological health of freshwater ecosystems due to the relatively high likelihood that surcharge events will occur at some point in the future.				
139.	It is acknowledged that the Kat River system is highly degraded and polluted. To quote: It has been subjected to significant degradation due to land cover and land use changes associated with urban development, plantation, damming, and alien invasive tree infestation.				The degraded nature of the Kat River is noted.
140.	It is noted with great concern that the applicant for this proposed development is also responsible for management of the Kat River System. The Municipality has blamed the stormwater flow from the Kat River for the nitrification of the dam leading to the prolific growth of Kariba weed. Now further land cover				The Medium rating is based on the mitigation measures proposed to minimize degradation of the potable water source.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	and land use changes associated with urban development is proposed to further degrade the potable water of George, and the impact is rated as MEDIUM!				
141.	<p>The discussion and public announcements provided below from the Ward 3 WhatsApp Group, places stormwater management at the hands of citizens, while sewage spills are proven to be a major source of pollutants:</p> <p>A program will commence shortly on clearing the Kat and other rivers (this is where citizens can play meaningful role in curbing, clearing pollution, aliens, etc). Tighter management on sewage is coming &amp; more budgetary funding on pump stations is needed but constrained by the difficult economic circumstances we are all experiencing - but is high priority. (Mayor of George, Ward 3 Whatsapp Group, 3/7/21)</p>				The WhatsApp discussions are noted.
142.	<p>Our 4 biggest pump stations are old &amp; require major refurbishment at R160m. A loan repayment of R24m pa over 10 years could fix this. This is 20% plus on annual revenue from Sewerage.</p> <p>Further significant capacity upgrades at WWTW are required. If this is not done, then all further construction activity has to stop.</p> <p>George currently faces R1bn in capital projects to deal with immediate critical capacity upgrades over next 3 years.</p> <p>Affordability is major issue &amp; limits what can be undertaken in any one year.</p> <p>(Mayor of George, Ward 3 WhatsApp Group, 3/7/21)</p>				
143.	GEORGE MUNICIPALITY Response: Monday 8 March				

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

<p>George Municipality is aware of a video clip doing the rounds on social media allegedly showing raw sewerage pumping into the Garden Route Dam.</p> <p>The pipe in question is located at the Eden Pump Station and is the required overflow pipe for the pump station. The incident of Sunday 8 March, was an overflow from the Eden Pump Station, which took place because the pumps were not able to cope with the standard discharge of sludge from the Water Treatment Works which coincided with an incoming high flow from the sewerage line entering the pump station. Such high flows occur generally at peak times such as early morning, lunchtime and early evening but occasionally a random high flow will be experienced and which is not possible to predict. The overflow pipe then handles the excess until the pumps are able to accommodate the load being received. The sludge discharged from the Water Treatment Works does not contain any sewerage as it is residue from the water treatment process. The overflow is however a combination of sludge and sewerage, and was therefore reported as per protocols Alert Level 2. The immediate river area is monitored and treated with chemicals. Such overflows are of a short duration and are random occurrences. All of the pump stations are fitted with an alarm system to alert the officials to such incidents. The Civil Engineering Department is monitoring and amending the system works to prevent such overflows occurring and the continued upgrading of the Eden Pump Station remaining a high priority.</p>				
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## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	Concern that this river water then flows into the Garden Route Dam is acknowledged, however the public is assured that water in the dam is sampled and monitored through a fixed statutory water quality monitory programme. Raw water from the Garden Route dam is treated according to the SANS 241 standard at the Water Treatment Works ([purification plant) and the water drinking quality for George complies with the SANS standard.				
144.	<p>Media Statement: Pump station overflow caused by backup failure</p> <p>Issued George Municipality, Saturday 20th March</p> <p>George Municipality regrets to advise that the ongoing loadshedding experienced this past week, led to the failure of the backup generator system at the Eden Pump Station.</p> <p>The backup failure led to an overflow which contained a combination of sludge and sewerage. The sludge discharged from the Water Treatment Works does not contain any sewerage as it is residue from the water treatment process.</p>				
145.	The Civils Directorate has reported as such to the Department of Water Services (DWS), as per the protocols as stipulated in the municipality's Wastewater Risk Abatement Plan. The immediate river area is being monitored and has been treated with chemicals as is the standard practice. (treatment required if the sludge does not contain sewage?)				
146.	The backup failure was compounded by the simultaneous failure of the SCADA system(Supervisory control and data acquisition) due to the loadshedding. Interim measures are				

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	being put in place to address such unusual failures with additional physical checks put in place particularly during loadshedding, and the continued upgrading of the Eden Pump Station remaining a high priority. George Municipality requests members of the public who become aware of such incidents taking place, to please immediately report the matter via the municipal switchboard on 044 8019111 or the after-hours number 044 8016300.				
147.	The Civil Engineering Services administration building located in York Street does not have active telephone lines during loadshedding. The Disaster Management Centre in Mitchell Street, however has generator backup and is staffed during loadshedding periods, with an additional civil engineering services complaints staff member to address such queries.				
148.	As previously stated, the concern that this river water flows into the Garden Route Dam is acknowledged, however the public is assured that water in the dam is sampled monitored through a fixed statutory water quality monitory programme. Raw water from the Garden Route dam is treated according to the SANS 241 standard at the Water Treatment Works (purification plant) and the drinking water quality for George complies with the SANS standard.				
149.	It is acknowledged that the mitigation measures will reduce the impact, but the track record of the applicant at implementing such measures at present is questionable. The mayor indicated that, if upgrades at WWTW are not done soon, further construction has to stop. In fact developers of existing erven in Groenkloof,				The development of this proposal is anticipated to occur over a 10-30 year period, during which time infrastructure upgrades would be put in place to accommodate the increased capacity requirements.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	Kraaibosch and the industrial areas may not currently develop for the next 36 months due to the lack of sewage capacity.				
150.	AND GEORGE MUNICIPALITY IS PROPOSING THIS DEVELOPMENT, WHICH WILL MOST LIKELY BE APPROVED WITHIN THE NEXT YEAR, WITH A TIME LIMIT ON THE ENVIRONMENTAL AUTHORISATION, PUTTING FURTHER PRESSURE ON THE SEWAGE WORKS AND THE FINANCES OF GEORGE MUNICIPALITY TO URGENTLY UPGRADE THE SEWAGE WORKS. It is acknowledged that the Outeniqua Treatment Works is currently being upgraded, but the Mayor still comments that further upgrades are required. This situation is highly undesirable.				
151.	<p>The mitigation measures that are proposed are questionable due to the lack of proof of existing implementation by the applicant:</p> <ul style="list-style-type: none"> <li>• The recommended use and maintenance of grease traps/oil separators to prevent pollutants from entering the environment from stormwater.</li> </ul> <p>These maintenance measures are effective if well implemented. They are usually delegated to the restaurants or body corporate or similar body to be implemented at the facility through conditions of approval. Their effectiveness is, however, as good as enforcement. One spill event at a waterfront development can have major implications. No grease traps or oil separators will be installed for stormwater.</p>				Your concern is noted, however, continued maintenance would be included into the legally binding environmental authorization.
152.	<ul style="list-style-type: none"> <li>• Key maintenance will include litter and sediment clearing and the servicing and maintenance of key collection points like catch pits, detention tanks etc. Such maintenance</li> </ul>				Your concern is noted, however, continued maintenance would be included into the legally binding environmental authorization.



## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	should be budgeted for. Litter, leaf litter and sediment clearing are either neglected or at best intermittent in any suburb of George. Leaf litter and sediment clog stormwater drains, resulting in overland drainage.				
153.	<ul style="list-style-type: none"> <li>Appropriate waste water infrastructure must be designed to prevent any such water from entering the surrounding environment. The wastewater infrastructure referred to is not specific and it is assumed that the recommendation refers to underground pipelines and pumps. While these may be effective, the wastewater from the development will be transported via the old, degrading, leaking bulk sewer pipeline to be treated at the existing, over capacity, malfunctioning, old wastewater treatment plant. This pipeline and plant are major sources of pollution in the dam already. (refer to the WhatsApp discussion).</li> </ul>				Wastewater upgrades are included into the proposed development.
154.	<ul style="list-style-type: none"> <li>Pumps, pipelines and other equipment should be regularly inspected and maintained. Spare parts should be readily available. Downtime should be kept to a minimum in order to prevent spillages and adverse environmental impacts</li> </ul>				These actions are included into the proposed mitigation measures.
155.	<ul style="list-style-type: none"> <li>The pipeline should be regularly monitored and maintained to ensure that any problems with the pipeline are rectified before they can impact on any watercourses.</li> </ul>				
156.	<ul style="list-style-type: none"> <li>The Department of Water regional office should be notified, as soon as possible, of any significant chemical spill or leakage to the environment where there is the potential to contaminate surface water or groundwater.</li> </ul>				
157.	<ul style="list-style-type: none"> <li>Stop the existing effluent from entering into</li> </ul>				This is a current municipal issue and does not fall

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	the river from the existing pump station.				within the scope of this proposal, however mitigation measures are proposed to stop effluent from entering the watercourses during the Operation of the development.
158.	<p>Refer to the WhatsApp discussion to determine the success of these mitigation measures.</p> <ul style="list-style-type: none"> <li>• • Better management of the system is required to prevent water pollution.</li> </ul> <p>Agreed. This is what GARDAG is aiming at facilitating.</p> <ul style="list-style-type: none"> <li>• • Direct discharge of untreated effluent into the river is not permissible.</li> </ul> <p><b><u>See original comment for images</u></b></p>				This is the aim of the proposal.
159.	Gardag is also questioning the implementation of the statutory monitoring programme referred to in the WhatsApp message, since the Municipality refuses to communicate the results of this programme. The monitoring results from Gardag at the Kat River are poor with a sewage pipe leaking into the Mitchell River, while the Meulen River results (presented above) are atrocious.				This is a current municipal issue and does not fall within the scope of this proposal.
160.	<p>Biodiversity Assessment</p> <p>The Biodiversity Sensitivity Analysis report refers. This report was compiled in 2018, with the terms of reference referring to botanical studies. It does not include other biota, apart from the fact that sensitivities for fauna was identified. These sensitivities, however, have shortcomings.</p>				Additional studies are now proposed in the Plan of Study for the EIA phase.
161.	In terms of avifauna, the report refers to Barnes (2000) which is the previous RDB book on birds and not to Taylor et al. (2015) which is the current and most up to date RDB for birds being available in 2018. This indicates that they are not familiar with the most current publications and				

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	data on birds and have not used the most up-to-date information available.				
162.	The report makes no reference to the current South African Bird Atlas project and data. Anyone familiar with birds would be able to use the list of birds for the pentad from (SABAP2) and highlight those birds for which there is suitable habitat on the study site. This would be more credible and defensible than what they have done in this report. This led to non-identification of two species identified as sensitive bird species in the Screening Report.				
163.	The Screening Report was clearly generated shortly before the application was submitted, and was not used to inform specialist involvement in the scoping and EIA process. The report provides information on gaps in knowledge in the scoping report which are not recognized as such.				
164.	Neither are there plans identified in the Plan of Study for EIA for addressing these gaps in information.				
165.	Apart from the bird species, there is a sensitive frog species identified that do occur in the Garden Route Botanical Garden, which is also a near natural environment, a grasshopper of which the preferred habitat is identified as scrubby fynbos and another sensitive species. SANBI's Species Environmental Assessment Guideline (2020) which informs species assessment as regulated under NEMA has clearly not been consulted.				
166.	Gardag, or the individuals involved mentioned at the start of this comment, can therefore not				GARDAG's stance is noted.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	approve the Plan of Study for Environmental Impact Assessment or the selection of the preferred alternative as the best practicable environmental option.				
167.	I trust you are well. A definite “No” from me with regards to the proposed garden route dam development.	Jackie Rossouw	16 May, 2021	Private individual	Your opinion is noted.
168.	One can list a multitude of reasons as to why this development project should be relocated to a alternative area – perhaps the area that was earmarked for the Sallywood development (or whatever it is called) that has recently been cancelled.				The availability of alternative locations is noted.
169.	The authorities should be more concerned about the protection of the source of our drinking water from contamination and to rather invest to mitigate those risks.				Mitigation of pollution is included in the proposal.
170.	For years there has been a flow of raw sewage into the Kat River that feeds into the dam. No doubt this sewage is nourishment for the surface algae/weed that has been an ongoing struggle to eradicate.				This is noted.
171.	I have personally seen and smelled the raw sewage spewing into the dam for years and have repeatedly reported the problem. Alarminglly the amount of raw sewage spewing into our dam actually increased last year. The very fact that this issue remains year after year indicates the local municipality are neglecting what reaches our water source.				Infrastructure upgrades and mitigation measures are included into the development proposal.
172.	The standard PR reply from the local authorities blame our aging waste water infrastructure and any rain events to cause the overflow of the sewage to bypass treatment and go right				

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	downstream into our dam." "My answer is that it's not OK." we should be protecting our freshwater resource (we only have one in George) and should be investing in updating our waste water systems around the dam to keep our drinking water safe.				
173.	Being the only source of drinking water the garden route dam is very important to George's economy and so we certainly need to be doing better with protecting it – and this includes not approving this unnecessary development around the shore of the garden route dam. I say a resounding NO to this development.				Your opinion is noted.
174.	COMMENT ON THE APPLICATION FORM AND DRAFT SCOPING REPORT FOR THE APPLICATION FOR SCOPING ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE 1. The abovementioned documents received by the Directorate: Development Management (Region 3), hereinafter referred to as "this Directorate" on 08 April 2021 and 15 April 2021 respectively, refer.	Shireen Pullen	17 May, 2021	Western Cape Government: Department of Environmental Affairs and Development Planning Development Management (Region 3)	
175.	2. Development Proposal and previous issues raised: a) It is understood that the proposal entails the development of a tertiary education campus, with associated residential units and open spaces on a portion of remainder of Erf 464, George.				The Department's understanding is noted.
176.	b) Please note that the site is sensitive as it contains sensitive wetland habitats and				The sensitivity of the site and its attributes have been taken into account when determining the

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	threatened species, such as <i>Gladiolus fourcadei</i> on the site. The sensitivity of the site and its attributes must be taken into account when determining the best practicable alternative, which can be implemented.				best practicable alternative.
177.	c) Another concern is the potential impact of the proposed development on the Garden Route Dam and surrounding environment in terms of possible pollution and the sense of place. This should be clearly addressed in the final scoping report.				Pollution control and sense of place are addressed in the Final Scoping report.
178.	d) Stormwater management on the site and the potential impact thereof on the surrounding environment is of utmost importance. It is therefore required that a Stormwater Management Plan be submitted along with the final Scoping Report.				A Stormwater Management Plan is included in the Final Scoping Report.
179.	e) Furthermore, it is recommended that a buffer area or corridor be established between the proposed development and the Garden Route Dam to mitigate any potential impact, including, but not limited to social and ecological impact on the dam and the surrounding environment. It is not clear to what extent this was taken into account to inform the preferred alternative.				The proposed open space area provides for buffers between the Garden Route Dam and the development area.
180.	f) A fire management plan must be developed in consultation with the Southern Cape Fire Protection Agency and CapeNature and these must be included in the Environmental Management Programme to be submitted along with the final Environmental Impact Assessment Report for decision-making, considering the vegetation that occurs on the development site, which requires regular burns. It is therefore also				This is noted and will be included in Final EIA.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	recommended that the applicant joins and become a member of the Southern Cape Fire Protection Agency.				
181.	g) It is further recommended that the construction of a sewage pump station be avoided at all cost. Should this be impossible, such pump station must be constructed downstream of the Garden Route Dam to avoid potential spills or overflows. Please indicate how this particular issue will be addressed.				The position of the proposed pump station will be further discussed in the EIA Report.
182.	h) It is important that the proposed development is ecologically sustainable and socially and economically justifiable to comply with the aspects of need and desirability, which is based on the principle of sustainability. As such, the aspect of need and desirability of the development proposal should be clearly demonstrated in the final Scoping Report and aligned with the requirements as set out in the Need and Desirability Guideline (2013) of this Department, which was published by the Department of Environmental Affairs (DEA) in 2017 to inform the best practicable alternative that should be implemented.				The Need and Desirability is in line with the Guideline.
183.	3. Based on the review of the application form and draft Scoping Report this Directorate would like to comment as follows: 3.1 Applicable listed activities It is noted from the application form that the activities applied for includes Activity 15 of Listing Notice 2, which implies that the proposed development will follow the Scoping/EIA process. Only the activities applied for can be considered. Please be reminded that the onus remains on the applicant to ensure that all the applicable listed				This is noted and all identified applicable listed activities have been applied for.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	activities are applied for and assessed as part of the EIA process.				
184.	<p>3.2 Screening Tool Report and Site Verification Report</p> <p>No screening tool or site verification report is attached to the application form, however, a screening tool report is attached to the draft SR. Please note that on 20 March 2020 the Minister of Forestry, Fisheries and the Environmental published the general requirements for undertaking site sensitivity verification for environmental themes for activities requiring environmental authorisation (Government Gazette No. 43110). In terms of these requirements, prior to commencing with a specialist assessment, the current land use and environmental sensitivity of the site under consideration by the screening tool must be confirmed by undertaking a site sensitivity verification.</p>				<p>A Site sensitivity verification report will be included with the Final Scoping Report.</p>
185.	<p>In light of the above it is advised that a Site Sensitivity Verification Report, which confirms or disputes the current land use and environmental sensitivity as identified by the screening tool is submitted to the competent authority along with the submission of the final scoping report and/or commencing with a specialist assessment.</p>				<p>Thank you for this comment, a Site Sensitivity Verification Report will be submitted as advised.</p>
186.	<p>3.3 Specialist Input</p> <p>a) The application form identifies the following specialist input in the EIA process, being:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> A Biodiversity Impact Assessment with plant and animal species assessment,</li> <li><input checked="" type="checkbox"/> Freshwater Habitat Assessment,</li> <li><input checked="" type="checkbox"/> Socio-Economic Assessment,</li> </ul>				<p>As per Section 9.1 of Scoping Report, the Screening tool recommended the following specialist assessments be conducted:</p> <ul style="list-style-type: none"> <li>• Agricultural Impact Assessment</li> <li>• Landscape / Visual Impact Assessment</li> <li>• Archaeological and Cultural Heritage Impact Assessment</li> </ul>



## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	<p>☑ Visual Constraints Report, ☑ Visual Impact Assessment and Butterfly Specialist Report.</p>				<ul style="list-style-type: none"> <li>• Paleontology Impact Assessment</li> <li>• Terrestrial Biodiversity Impact Assessment</li> <li>• Aquatic Biodiversity Impact Assessment</li> <li>• Hydrology Assessment</li> <li>• Socio-Economic Assessment</li> <li>• Plant Species Assessment</li> <li>• Animal Species Assessment</li> </ul>
187.	<p>b) Please indicate how this compare with the results of the findings of the screening tool report and the Plan of Study of Environmental Impact Assessment (EIA).</p>				<p>In response to these recommendations, the following studies were compiled for the proposed development, which is felt addresses all of the potential impact concerns:</p> <ul style="list-style-type: none"> <li>• Biodiversity Impact Assessment with Plant and Animal Species Assessment</li> <li>• Freshwater Habitat Assessment</li> <li>• Socio-Economic Assessment</li> <li>• Engineering Services Report</li> <li>• Visual Constraints Report</li> <li>• Visual Impact Assessment Report</li> <li>• Butterfly Specialist Report</li> <li>• Agricultural Statement</li> </ul> <p>A comment regarding the potential Heritage Resources on the site has been provided from Heritage Western Cape (see Appendix I8), wherein they note that the proposed development will not impact on heritage resources and therefore no further action is required. Heritage Impacts have, therefore, not been further investigated but HWC will be given the opportunity to comment throughout this process.</p>
188.	<p>c) On 20 March 2020 the National Minister of Environment, Forestry and Fisheries gazetted the procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of Section 24(5)(a) and (h) and</p>				<p>The requirements of the Procedures are noted.</p>

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	44 of the NEMA, when applying for environmental authorisation. Any specialist performing work related to any of the fields of practice listed in Schedule I of the Natural Scientific Professions Act, 2003 (Act 27 of 2003) must be registered with the South African Council for Natural Scientific Professions ("SACNASP") in any of the prescribed categories [Section 18] and further to this, only a person registered with the SACNASP may practise in a consulting capacity [Section 20].				
189.	d) It will therefore be prudent for such specialists performing specialist studies or preparing specialist reports to provide proof of compliance with this Act. Please ensure that all specialist input complies with this requirement, unless the specialist was appointed prior to 9 May 2020.				All specialist input will comply with this requirement, unless the specialist was appointed prior to 9 May 2020, then it will comply with Appendix 6.
190.	<p>3.4 The following requirements must be complied with in respect to all applications for Environmental Authorisation in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the EIA Regulations, 2014 (as amended):</p> <p>a) Alternatives</p> <p>In terms of the NEMA and EIA Regulations, the investigation of alternatives is mandatory. This includes the option of not proceeding with the proposed activity (the "no-go" option). All alternatives identified must be determined to be feasible and reasonable. In this regard it must be noted that the Department may grant authorisation for an alternative as if it had been applied for or may grant authorisation in respect of the whole or part of the proposed project in</p>				The requirements regarding alternatives are noted and will be complied with.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	<p>the application. Alternatives are not limited to activity alternatives, but include layout alternatives, design, operational and technology alternatives.</p> <p>If, after the identified alternatives have been investigated and no feasible and reasonable alternatives were found, beyond the comparative assessment of the preferred alternative and the option of not proceeding, proof of the investigations undertaken and a motivation must be provided that there are no reasonable or feasible alternatives other than the preferred option and the no-go option. Please refer to the Department's Guideline on Alternatives available on the Department's website <a href="http://eadp-westerncape.kznsshf.gov.za/your-resource-library">http://eadp-westerncape.kznsshf.gov.za/your-resource-library</a>) in this regard.</p>				
191.	<p>b) Public Participation</p> <p>The Scoping Report must be subjected to a Public Participation Process that must comply with Chapter 6 of the EIA Regulations, 2014 (as amended).</p>				Public Participation complies with Chapter 6.
192.	<p>In addition to the above, the Environmental Assessment Practitioner ("EAP") must submit an electronic copy of the draft Scoping Report to the Department for a 30-day comment period. The draft Scoping Report must also be made available to all relevant State Departments/Organs of State that administer laws relating to a matter affecting the environment, for a 30-day comment period. The EAP must notify the Department in writing of the date the draft Scoping Report was submitted to the relevant State Departments/Organs of State and clearly indicate</p>				Proof of Public Participation is included in Appendix E.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	whether or not such State Departments/Organs of State were notified of the 30-day comment period in terms of Section 24O of NEMA. It is imperative that State Departments/Organs of State are in possession of the draft Reports when the EAP issues them with the notice in terms of Section 24O of NEMA. Please note that the EAP is responsible for such consultation. Therefore, it is requested that the EAP include proof of such notification to the relevant State Departments/Organs of State in terms of Section 24O(2) and (3) of NEMA in the Scoping Report, where appropriate.				
193.	In terms of good practice, you are encouraged to engage with State Departments and other Organs of State early in the EIA process to solicit their inputs on any of their requirements to be addressed in the EIA process. Please note that this does not replace the requirement of making the draft Scoping Report available to State Departments/Organs of State as stipulated above.				This is noted and engagement with State Departments and Organs of State is ongoing.
194.	A register of I&APs must be opened and maintained. The register must also be submitted to the Department.				A register is included in Appendix E.
195.	The EAP must record and respond to all comments received. The comments and responses must be captured in a Comments and Responses Report and must also include a description of the public participation process followed. This report must also be included in the public participation information attached to the Scoping Report and EIA Report to be submitted for decision.				All comments received have been responded to in Appendix E.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

196.	<p>c) EIA/ WULA Synchronisation</p> <p>It is noted from your submission that the proposal requires a Water Use Licence (WULA) in terms of the National Water Act, 1996 (Act No 38 of 1998). In light of the one environmental system, it is now a requirement to synchronise the EIA and WULA processes in order to ensure that both processes are duly informed by one another. It is therefore the duty of the Environmental Assessment Practitioner ("EAP") to take note of the timeframes and synchronise the two processes. Failure to give effect to the one environmental system may prejudice the success of the application.</p>				<p>The EIA and WULA processes have been synchronised.</p>
197.	<p>d) Plan of Study</p> <p>A Plan of Study for EIA, which sets out the approach to the EIA in accordance with Appendix 2 of GN No. R. 982 of 4 December 2014 (as amended), must be compiled and submitted together with the final Scoping Report.</p>				<p>The PoS has been included in Annexure I.</p>
198.	<p>e) Guidelines</p> <p>When undertaking the EIA process, you must take into account applicable guidelines, including the guidelines developed by this Department. These can be downloaded from the Department's website (<a href="http://eadp-westerncape.kznsshf.gov.za/your-resource-library/policies-guidelines">http://eadp-westerncape.kznsshf.gov.za/your-resource-library/policies-guidelines</a>). In particular, the guidelines that may be applicable to the proposed development include, inter alia, the following:</p> <ul style="list-style-type: none"> <li>☐ Circular EADP 0028/2014: One Environmental Management System.</li> <li>☐ Guideline for the Review of Specialist Input in</li> </ul>				<p>The recommended Guidelines have been consulted during the process.</p>

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	<p>the EIA process (June 2005).</p> <p>☐ Guideline for Involving Biodiversity Specialists in the EIA process (June 2005).</p> <p>☐ Guideline for Environmental Management Plans (June 2005).</p> <p>☐ Guideline on Alternatives (March 2013).</p> <p>☐ Guideline on Need and Desirability (March 2013).</p>				
199.	<p>f) Need &amp; Desirability</p> <p>In terms of the NEMA EIA Regulations, when considering an application, the Department must take into account a number of specific considerations including inter alia, the need for and desirability of any proposed development. As such, the need for and desirability of the proposed activity must be considered and reported on in the Scoping and EIA Reports. The Scoping and EIA Reports must reflect how the strategic context of the site in relation to the broader surrounding area, has been considered in addressing need and desirability. Refer to the Department's Guideline on Need and Desirability (March 2013).</p>				<p>The Department's Guideline on Need and Desirability (March 2013) has been taken into consideration.</p>
200.	<p>g) Services</p> <p>Please ensure that confirmation of sufficient unallocated services (water, sewage and solid waste) exists within the George Municipal grid to support the proposed development. Written confirmation thereof is crucial to the success of this application.</p> <p>You are also advised to investigate the implementation of resource conservation measures as part of your proposal, in order to conserve much needed services.</p>				<p>Written confirmation of services will be included in the EIA Phase.</p>

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

201.	h) NEMA Principles In addition to the above, you must clearly show how the proposed development complies with the principles contained in Section 2 of the NEMA and must also show how the proposed development meets the requirements of sustainable development.				This is noted and will be included in the EIA Report.
202.	i) Scoping Report Requirements The Scoping Report must contain all the information outlined in Appendix 2 of GN No. R. 982 of 4 December 2014 and must also include the information requested in this letter. Failure to submit any information prescribed in Appendix 2 of GN No. R. 982 may result in Environmental Authorisation being refused.				Table 1 of the Scoping Report shows the required content of a Scoping Report according to the 2014 NEMA EIA Regulations and where in the report the required content can be found.
203.	The Department awaits the submission of the Scoping Report as prescribed by Regulation 19 of the EIA Regulations, GN No. R. 982 of 4 December 2014. In accordance with Regulation 21 of GN No. R. 982 of 4 December 2014, the Department hereby stipulates that the Scoping Report must be submitted to this Department for decision within 44 days from the date of receipt of the application by the Department, calculated from 8 April 2021.				Noted.
204.	If the Scoping Report is not submitted within the prescribed timeframe, the application will lapse in terms of Regulation 45 of Government Notice Regulation No. 982 of 4 December 2014 and your file will be closed. Should you wish to pursue the application again, a new application process would have to be initiated. A new Application Form would have to be submitted and the prescribed application fee would have to be paid.				The potential lapse of the application is noted.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

205.	3.5 Content of the final SR a) The final Scoping Report must contain all the information outlined in Appendix 2 of GN No. R. 982 of 4 December 2014 and must also include the information requested in this letter.				The final Scoping Report contains all the information outlined in Appendix 2 and the information requested in this letter.
206.	b) Failure to submit any information prescribed in Appendix 2 of GN No. R. 982 may result in Environmental Authorisation being refused.				This is noted.
207.	c) The final SR must also contain a Plan of Study for EIA, which sets out the approach to the EIA in accordance with Appendix 2 of GN No. R. 982 of 4 December 2014, must be compiled and submitted together with the SR.				The PoS is included in Annexure I.
208.	d) It is noted that the draft SR contains three specialist reports. Care must be taken not to collapse the scoping and environmental impact assessment processes. The EAP is advised not to collapse the scoping process by including specialist input, prior to a plan of study being accepted by the competent authority.				The Specialist reports included in the Scoping Phase are Baseline Reports used to inform the Scoping Phase.
209.	The Scoping and EIA phases of the EIA process are two distinctly separate phases, each having its own requirements and reports to be submitted. The Department will not accept Scoping and EIA Reports where the processes or information of the two phases were combined into a single process or report.				The Scoping and EIA Reports will be two distinct reports and will not be combined into a single report.
210.	4. Submission of information In accordance with the Directions regarding measures to address, prevent and combat the spread of COVID-19 (Government Notice No. 650 of 5 June 2020) during Alert Level 3, all applications, reports and documents, which include all signatures and Annexures which are				The procedure to submit information is noted.



## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	included as part of the application and subsequent reports, must be submitted via e-mail to the relevant official, with attached PDF versions of letters and reports. If the documents are too large to attach to an e-mail, the competent authority must be notified per e-mail and provided with an electronic link to such documents that is accessible by the relevant authority.				
211.	Note: The Directorate: Development Management (Region 3), has created a generic e-mail address to centralise its administration within the component (i.e. notifying clients of decisions and receiving EIA applications, Notice of Intent form; request for fee reference numbers, etc.) Please make use of the new e-mail address when submitting any documents: DEADPEIAAdmin.George@westerncape.gov.za				T generic email address is noted.
212.	5. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.				The reference number will be used going forward.
213.	6. Please note that the activity may not commence prior to an Environmental Authorisation being granted by the Department. It is an offence in terms of Section 49A of the NEMA for a person to commence with a listed activity unless the Department has granted an Environmental Authorisation for the undertaking of the activity. Failure to comply with the requirements of Section 24F and 49A of the NEMA will result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department for prosecution. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million				The consequences of commencement prior to an EA being granted are noted.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.				
214.	7. The Department reserves the right to revise initial comments and request further information from you based on any new or revised information received.				Noted
215.	To whom it may concern I would herewith like to be cited as an Interested and Affected Party, being a landowner in the vicinity of the dam.	Ingrid Van Wyk	17 May, 2021	Private individual	You have been included as an I&AP.
216.	Feedback to the new Proposed University: - The road to the Dam from Meyer street is currently open to all taxpayers of George freely and at any time offering a nature resource and access to the parks and forests on the other side of the dam				This is not proposed to change.
217.	- The Dam has always been one of Georges most spectacular areas for both nature lovers and runners, cyclists, walkers horse riders and has increasingly become so for the many people in the area since Covid				This is noted and the proposal takes this into consideration.
218.	- The fact that a Waterfront and Hotel has been approved 7 years ago, should have no relevance in the current situation with new knowledge that is available to the municipality – and that is that no other waterfront in the entire country has been an economical or tourism success (except for the V&A Waterfront – and has in fact reduced the areas to dump and polluted cities (Hennopsdam, Bruma Lake, Randburg Waterfront, ect ect)				It is felt that the inclusion of these uses has been well argued in previous applications and that the potential benefits which can be extracted from these uses can now be further enhanced through the inclusion of the proposed additional land uses.
219.	- In addition to the above, the proposed waterfront is right on top of the only George dam – the main and only source of water for George				Pollution control measures are included in the proposed development.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	and George cannot afford to have a polluted water resource				
220.	- The George dam is one of the most photographed pictures of “George for tourists”				This is noted.
221.	- The latest proposal of adding a University to the development is nonsensical and extremely detrimental to the entire George for the following reasons: o There is a university in George and it has not created the massive economic growth the town has been looking for				Section 3.1.2 of the Pre-Application Comments & Responses Report addresses this.
222.	o There is sufficient space to expand the university				
223.	o A big component of the current George taxpayers moved down to George from the main city centers for the serenity and nature and beauty offered by George				This is noted.
224.	o By adding a university and a waterfront and hotels right on the dam, you are destroying the main attraction of why many of the residents of George (including ourselves) have moved down to build businesses				Your comment is noted, however the proposed development aims to maintain a large portion of public open space (67ha).
225.	- According to the proposal, the main purpose of the proposed development is to create employment opportunities, economic growth and offer education to all. What this proposal does not take into account is that: o Many of the people who moved down to George because of the nature, the serenity, and the low population, has in fact created many jobs through businesses and by developing George in a similar high density city, you are chasing those same people who created the jobs in the first place away				Your opinion is noted.

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

226.	o All the schools in George are over full. There are waiting lists of hundreds at each of the school.				This will be further investigated by the Socio-Economic Specialist in the EIA phase.
227.	o The education need in South Africa is not tertiary education - it is good secondary education.  · A small percentage of pupils in especially rural and township areas, do finalise grade 12 with proper university exemption due to various factors which can be addressed, such as:  · After-school care  · More schools  · Colleges which provides trades as opposed to degrees				
228.	o In order to create a bigger employable population, focus needs to be placed on needed skills o Since the introduction of the original educational aspirations, there were no 'fees must fall' protests.				
229.	o If there are riots at universities – for any reason whatsoever, there will be no access to the people of George to the dam				There are three formal access routes currently planned into the development. In addition, the blanket statement that universities lead to rioting are unfounded. Universities from time to time do see protests, most of which are peaceful. Marches for worthwhile causes are also sometimes held at universities. They are places where freedom of expression is upheld. The people attending these demonstrations be it for Woman's rights or animal rights or any other matter are the sons and daughters of the very city the university is located in as well as residents from out of town.
230.	o During construction of the Waterfront, hotel				Access to the area will remain open as long as

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	and university, there will be no access either				safely allowed.
231.	o The University and Waterfront will destroy all the property values around the area				This statement is not supported. Barbour (2019) provides case studies from existing universities and clearly describes the benefits the development of these have had on the towns within which they occur.
232.	- The access on Meyer street over the dam wall is the only access for the people to the North of George to the mountains. o There are no other parks and access roads into the mountains like the other areas in George				This access is noted. Additional access points are proposed in this development.
233.	- One of the stated economic drives that has been mentioned is construction: o Once the construction has been completed – where will the constructors get more work?				Construction employment would ideally be from the local community.
234.	o Are you not attracting more people to George who will have no future jobs as there are no industries in George				
235.	Proposal: - George and surrounding areas have always been a tourism area, attracting hundreds of tourists - This has stopped as a result of Covid but will definitely continue. - Tourism brings euros, dollars and pounds to George which will create much more money and a viable economy to George than yet another Waterfront - See the article of Deepak Chopra below as recently published: The future of travel is nature and serenity o No one is interested in traveling to cities and built up areas anymore				The 67ha of open space proposes to improve access for cyclists, trail runners, walkers and canoeists, fishermen, amongst others to the existing recreational areas around the dam.
236.	- The proposed developments of George will				

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

	destroy the fast growing: o Green fitness o Green tourism None of this will ever be able to return again				
237.	- The original densification proposal of George should be avoided at all costs with the new knowledge gained over the past few years, being: o Universities are going to become more and more remote o Students don't have the money to afford on staying on campuses anymore o Our natural resources cannot be destroyed under any circumstances as it is a massive tourism attraction o Tourism - green and sport – should and is becoming the main income and growth focus of George				Your opinions are noted and will be taken into consideration in the indepth EIA phase.
238.	- By including the various sporting societies and green wellness movements, the entire area around the dam can become be restored to a natural forest again to attract thousands of people at an entry cost for wellness experiences.				As mentioned above, the 67ha of open space proposes to improve access for cyclists, trail runners, walkers and canoeists, fishermen, amongst others to the existing recreational areas around the dam
239.	- In order to increase education levels by 2030 as referred to in the document, more money should and need to be invested into schools and after-care facilities for children who don't have the luxury of stay-at home parents <b>SEE ORGINAL COMMENT FOR ARTICAL</b>				This will be further investigated by the Socio-Economic Specialist in the EIA phase
<b>COMMENTS RECEIVED AFTER THE CLOSE OF PUBLIC PARTICIPATION</b>					
240.	Thank you for your response to our previous communication during the public participation phase for the proposed development at the Garden Route Dam. Your comments have been noted, yet I must strongly emphasise the	Mareta Strydom	18/05/2021	Berg-en-Dal Hiking Club	

## COMMENTS AND RESPONSE TABLE:

### DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE

	following points which I believe have not been satisfactorily addressed in your response and must be understood very clearly by everyone that cares about development in the Garden Route Dam area.				
241.	<b>This is the wrong development for this location. A university or educational institution is not appropriate for this site.</b> George is a nature lovers' paradise and the GRD area is a popular and well established hub for recreational activities. Since my previous letter I have had many discussion with our club members, as well as other residents of George, and all consider it vitally important that the Dam area should remain a portal to nature and the great outdoors. The idea of a nature park or reservation area that include opportunity for relaxation and leisure in a natural environment is what is most often aired. Even in your own Comments and Responses Report, as well as the newspaper articles included in said report, it is crystal clear that the majority of Georgians want the GRD area to offer an atmosphere of serenity and peace which will not be achieved with a university campus.				The 67ha of open space proposes to improve access for cyclists, trail runners, walkers and canoeists, fishermen, amongst others to the existing recreational areas around the dam.
242.	<b>There are other sites more suitable for a university.</b> I shall not repeat the numerous suggestions already tabled – there certainly is no shortage of them. We are not against a university for George. In fact, it is an excellent idea – but not next to the Garden Route Dam!				The site has been earmarked for urban expansion since the adoption of the municipal spatial development framework in 2013 and has been included in the urban edge as potential land for expansion ever since.  Municipal Infrastructure Master Plans have also incorporated the site for future development since its inclusion in the urban edge in 2013. The proposed tertiary institution therefore aligned with the existing Spatial Development Framework as

## COMMENTS AND RESPONSE TABLE:

### DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE

					well as other spatial planning policies and strategies.
243.	<p>A <b>low-density residential development</b> with high levels of interaction with nature is much more appropriate for the Dam area and more likely to achieve sustainability. The right development should help restore the ecological balance of the area, not destroy high value fynbos and wetlands.</p> <p>In such a development, the eradication of alien plants must be set as a priority and the planting of indigenous plants and trees be a non-negotiable requirement. Especially after the 2018 fires, we need to preserve every possible pocket of the extremely valuable fynbos in the Outeniqua mountains, which finally received official World Heritage Site status in February 2021. This accolade offers an excellent opportunity to incorporate eco-tourism with the suggested low-density residential development in the Dam area, seeing that an hotel has already been approved.</p>				The density of the residential areas will be investigated in the EIA phase.
244.	The civil servants of the George Municipality should live up to their name and serve the citizens of George who voted for them, by taking to heart their comments about what we want for our city.				Your comment is noted.
245.	Forestry is responsible for the implementation and the enforcement of the National Forest Act (NFA), Act 84 of 1998 as amended and the National Veld and Forest Fire Act, Act 101 of 1998 as amended (NVFFA). Thank you for giving Forestry this opportunity to comment on above application.	Melanie Koen	18/05/2021	Department: Environment, Forestry and Fisheries - Forestry Western Cape	Forestry's responsibility is noted.



## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

246.	1 Forestry studied the supporting documents for the above mentioned application and the following points related to Forestry's mandate i.e. the implementation of the NFA are applicable a. According to the report and information provided most of the area is disturbed with remnants of indigenous forest patches occurring				This is noted.
247.	b. Forestry request that a 20-30m buffer be allowed between the forest ecotones and any developmental proposal				The inclusion of this buffer will be investigated in the EIA phase.
248.	c. That indigenous forest patches/ as well as protected/ indigenous trees be incorporated (through detailed surveying) into any developmental proposal/ design- and be retained/ protected and indicated as no-go areas. That indigenous forest patches/ as well as protected/ indigenous trees be GPS'd and their exact position be incorporated within the development design footprint as no-go areas in order to ensure protection.				This condition will be included into the EMPr and will be conducted prior to the completion of the detailed designs.
249.	2 Forestry reserves the right to revise initial comment based on any additional information that may be received or obtained				This is noted.
250.	We believe it does not make sense for this university project to implemented on this garden route dam erf. The following comments are applicable: 1) There is university grounds available at Saasveld UPE campus which is only 5 km away. No sense in duplicating here when such a facility is already on our doorstep.	Elbert Kruger	18/05/2021	Private	This issue is addressed in Section 3.1.2 of the Pre-Application Comments & Responses Report.
251.	2) The traffic increase will be to the detriment of the surrounding neighbourhood.				Various upgrades to address the increase in traffic are included in the Traffic Impact Assessment.
252.	3) Property prices in the neighbouring area will fall.				This issue is addressed in Section 3.1.9 of the Pre-

## **COMMENTS AND RESPONSE TABLE:**

### **DRAFT SCOPING REPORT FOR THE PROPOSED UNIVERSITY PRECINCT DEVELOPMENT AT THE GARDEN ROUTE DAM AND ASSOCIATED INFRASTRUCTURE ON A PORTION OF THE REMAINDER OF ERF 464, GEORGE**

					Application Comments & Responses Report.
253.	4) Nobody wants a University campus in close proximity. Students in South Africa are always protesting over something, burning libraries etc. This would ruin this neighbourhood ???				This issue is addressed in Section 3.1.5 of the Pre-Application Comments & Responses Report.
254.	5) We all suspect crime will increase substantially during and after this development.				Your concern is noted and will be further investigated by the Socio-Economic Specialist in the EIA phase.
255.	5) What type students are you going to get ????				This remains to be seen.
256.	6) This area is a pristine area used by people of George to cycle, run, walk there dogs, hike etc. Having this development will destroy these activities.				The proposal aims to improve access for cyclists, trail runners, walkers and canoeists, fishermen, amongst others to the existing recreational areas around the dam.
257.	7) Everybody I have spoken to are against this development.				This comment is noted.
258.	Hopefully common sense will prevail in trying to preserve this beautiful area. Rather keep this area green and develop it along these lines.				An Open Space of approximately 67ha is proposed around the development area.
259.	<i>Comments included as notes in the Scoping Report</i>	Sue Cato	18/05/2021	Private	
260.	This description is provided throughout the document but in essence it is misleading given the nature of the development.				This comment relates to the reference to the University Precinct Development, which is considered an applicable description.
261.	Only way in which it was made available? How were I&APs made aware of the report to comment? Was there a registration list, adverts, copies sent electronically ad lib. May be in is explained later in the report but this sentence then needs to at least refer to it.				The full description of Public Participation was included in Section 8 of the Scoping Report, as well as in the Pre-Application Comments & Responses Report.
262.	Please provide better quality maps to compare details per zone with what is stated on older/other maps. I have picked up discrepancies in number of ha per zone but cannot read some data on maps.				High quality maps were included as annexures to the Scoping Report.

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263.	Yeah, alright.				This comment relates to the Interested & Affected Party Register and it is uncertain as to what the I&AP is insinuating.
264.	Why, if 57% is supposed to be green belt?				This comment relates to the statement “The project will require the majority of vegetation on the property to be cleared resulting in land cover changes in the catchments.” Any changes to landcover would result in impacts on the existing catchments, regardless of percentages.
265.	After having considered the Responses Report and Appendices thereto, the university wishes to record that we have no further comments, other than those we had already lodged.	Lee-Anne Groener	19/05/2021	Nelson Mandela University	This is noted.
266.	Apologies in advance, but I didn’t download the report so that I could comment on the latest report for the proposed GRD development in time. I’m just trying to download the report now, but am having some password issues. Would it be OK if I shoot through any comments this afternoon?	Jackie Dabrowski	20/05/2021	Confluent	The following response was sent: “Unfortunately, the commenting period ended on Monday and I am in the process of finalising for submission first thing tomorrow morning. You are, of course, welcome to send through your comments, but I cannot guarantee they will be responded to in this round of Public Participation.”
267.	I would really appreciate it if you could include my comments, as several aspects that I commented on previously have still not been addressed in detail. I realise though that they may come up in further reports. Please see comments below:	Jackie Dabrowski	20/05/2021	Confluent	<b><i>Comments have been included in this table, however, the comments and concerns will only be addressed in the EIA Phase due to time constraints associated with submission of the Final Scoping Report.</i></b>
268.	Section 4.2.1.3 This section refers to recreational spaces. This section fails to acknowledge the current existence of an extensive network of trails already frequently used by runners, walkers, dog-walkers and cyclists – which is currently privately maintained. It states that one of the benefits of				

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	<p>the proposed development is that trails will be formalised and made more accessible for recreational use, but the trails are already very accessible and maintained in an excellent condition by the Hillbillys mountain bike club. In my opinion this is falsely presented as a benefit of the development because it is already developed and functioning very well.</p> <p>Furthermore, the municipality have stated that they don't have the funds to actually provide any formal trails if the development goes ahead, so there's no guarantee that the trails will be available anyway.</p>				
269.	<p>The other issue is that of a building a sports field like a cricket oval where sporting events can be held. Here a number of points are relevant.</p> <p>Firstly, there is a fantastic cricket field, soccer field and rugby field at Saasveld 1.6km away as the crow flies. These are currently very underutilised and could be revived for use if the need was genuine.</p> <p>Secondly, the George Municipality has extensive sports fields in King George Park. These grounds are neglected, have vagrants, and broken buildings although local sports clubs still use them and beg the municipality to maintain them. It would be a lot more cost effective in terms of investment and environmental costs to invest in upgrading these existing facilities as opposed to creating new ones. To develop a sports field on a critically endangered / vulnerable vegetation type which is rapidly diminishing seems an excessive and wasteful use of natural resources. One can argue that the site is degraded and has previous forestry and lots of wattles etc etc. But</p>				

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	there is still an extremely viable seedbank and rehabilitation of invaded areas would be highly successful. Instead of a cricket ground, why not make a good rehabilitation attempt in a green space to restore the natural vegetation, providing the people of George an insight and education into our natural heritage about the vegetation that existed here before development?				
270.	Section 4.2.3.1 This section discusses stormwater management. As the development is more or less surrounded by watercourses, all stormwater discharge has the potential to cause channel incision, down-cutting and erosion, which will also affect riparian vegetation and wetland health. Therefore a more detailed description of SuDS methods proposed should be provided and must seriously investigate the use of large vegetated swales and attenuation facilities which slowly discharge water through filtration. These will also provide habitat for the numerous amphibians which will be displaced and killed by the development.				
271.	Section 4.2.3.4 Solid waste. Along with bagged and binned waste would the municipality include the regular clearing of solid waste traps indicated in the above stormwater section? These tend to be installed, and then never cleaned out.				
272.	Pg. 62 States that a revised site layout plan was designed following stakeholder workshops etc. I would like to be included in these workshops please, and knew nothing of them. How do I				

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	keep informed about this? For instance the commercial area indicated in red in Fig. 10 has no buffer area between it and the dam. This would be best practice to protect water quality in the dam from direct littering and other potential pollution. Buffers exist elsewhere, but why not here?				
273.	Table 10 These two alternatives result in the same development area (118.5 ha) just arranged differently. Shouldn't one alternative be a 'lighter' development with a lesser footprint?				
274.	Section 6.3 I made a number of points previously indicating that there are more extensive and fragmented wetland areas than are indicated in the freshwater specialist study. For instance the extensive wetland area down the slope from the source indicated by the attached location. While this may be from a pipe and could thus be considered artificial, it is widely accepted by the BGCMA and water affairs that if a functional wetland has been created it must be assessed before development can occur. There are also several other areas with wetland vegetation on both sides of the main entrance road which have not been assessed. Is the report still going to be updated to reflect these? As it stands, the development is going right over these areas, which would necessitate a wetland offset process to be included in the WULA.				
275.	6.4.1 Soils and geology This section gives the cape farm mapper description of soils, which are essentially duplex soils. Duplex soils frequently have overlying				

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	wetlands due to the relative impermeability of the clay layer and depending on the depth of the A horizon. The presence of duplex soils at the site (which has been confirmed) would support the fact that more wetland areas may be present than have been currently mapped.				
276.	Fig. 18 It should be noted that the authors of this figure are not qualified wetland ecologists and did not conduct a thorough survey of wetland areas, therefore their map of wetland areas cannot be concluded to be complete.				
277.	Section 6.5 Vegetation. The follow up site visit appears to have been conducted fairly soon after the widespread fire in the area which is a major constraint in the assessment of vegetation. This must be highlighted in the study, and a follow up assessment should be conducted as many of these areas are now regenerating.				
278.	Section 6.6 No monitoring and sampling has been done for small mammals, amphibians, reptiles etc. At the very least, citizen science platforms such as iNaturalist could be consulted to see what species have been identified at the site. The recent City Nature Challenge saw lots of observers at the Garden Route Dam and observations cover a wide range of taxa. The butterfly survey was done exactly one season after the extensive fires levelled vegetation around the dam in October 2018. That would also be a caveat to the results of this study.				
279.	Section 7.1 Need and Desirability				

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	<p>While the education goals in the NDP are acknowledged, the section does not address the major elephant in the room which is the existing university campus within spitting distance of the proposed development area. This campus is arguably under-utilised and if such a huge need exists for additional education facilities then why would one not consult the existing facility to see whether this need cannot be met in the existing development. Saasveld has plenty of open space for additional development. I would expect that a strong argument be put forward as to why Saasveld can NOT accommodate the proposed university services. This should include results of a meeting between university management and the municipality, but would also require a more detailed analysis of the types of departments and courses that are envisaged and 'needed' for the area. The site is also not closely located to potential students with limited resources, such as those from Tembaletu etc. This results in the same issue currently raised about the lack of suitability of Saasveld, which is limited transport to the campus.</p>				
280.	<p>Section 8.1 Public participation should also include a 60 day PP for the WULA.</p>				