

REFERENCE: 16/3/3/1/D2/19/0033/24
DATE OF ISSUE: 18 November 2024

The Director
Pieterkoen Development Company (Pty) Ltd
P.O. Box 2582
GEORGE
6530

Attention: Mr. Justin Branford

Cel: 083 284 0728
E-mail: Justin.Branford@igen.co.za

Dear Sir

COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT ON REMAINDER OF PORTION 21 OF FARM 195 KRAAIBOSCH, GEORGE

1. The abovementioned document Referenced: 19/RD/PK/10/24 dated 15 October 2024 and submitted by your appointed registered Environmental Assessment Practitioner (EAP) Mr. Michael Bennett (EAPASA Registration Number: 2021/3163) to the Directorate: Development Management (Region 3) hereinafter referred to as "this Directorate" on 17 October 2024, refer.
2. This Directorate has reviewed the document and comments as follows:

2.1. Specialist input and comment from CapeNature

From the specialist input provided, it is noted that the site is highly transformed and therefore, the impact on terrestrial biodiversity, aquatic biodiversity, fauna plant species is expected to be of low significance. The BAR further states that, despite the site's position inside the biodiversity network, it is highly compromised by past agricultural activities and invasive vegetation. Based on this, it is concluded that "the chance of successful rehabilitation is slim". As custodian of Biodiversity, please ensure that comment from CapeNature is submitted along with the final BAR.

2.2. Alternatives

Concerns regarding the visual impact/ impact on the sense of place that may result from the proposed development and the EAP/ Architects subsequent response thereto are noted. The Interested and affected Party (I&AP) suggested that the placement of the proposed flats be reconsidered in a manner that minimizes the impact on the surrounding landscape and views. The motivation provided in the statement that the *Single Residential II* zoning makes provision for flats with a maximum height of 15m to the top of the roof, is not acceptable and it does not adequately address the impacts or the impact mitigation hierarchy, nor the concern that has been raised by the I&AP.

This aspect must be addressed, and a layout or design alternative must be considered based on the concern raised by the public, that should at least be considered. Furthermore, you are required to elaborate on the aspect and how the input was considered and why the alternative proposed has not been considered based on the expected impacts.

2.3. Need and Desirability

Need and desirability of a proposed development depends a lot on the benefit to the broader society. The BAR and Planning Reports indicate that the proposed development include various housing aspects of the proposal will accommodate the mixture of income housing opportunities for which there is a demand. As is commonly known, there is a huge demand for middle-income housing opportunities in South Africa and undoubtedly in George as well. Kindly indicate whether this has been considered in any stage of planning for the proposed development.

In this regard it must be clearly demonstrated how the relevant guidelines have been considered, *inter alia*:

- DEA (2017), *Guideline on Need and Desirability, Department of Environmental Affairs.*
- *Guideline for involving social assessment specialists in the EIA process, February 2007.*
- *Guideline for involving economists in the EIA process, June 2005.*

2.4. Phasing of Services

Your confirmation of services from the George Municipality: Directorate: Civil Engineering Services (File Ref: Erf 21/195, George) dated 25 July 2023 is noted. However, the letter refers to upgrades (to water and sewage) that is required to support the proposed development in its entirety and indicates that a phased implementation will be applied to the proposed development. The BAR also states that the services will be provided in four phases from south to north.

Please provide this Directorate with clarity regarding the phases (how many units will each phase consist of and which upgrades will be required for each phase).

The information on the upgrades must clearly demonstrate whether any of the upgrades require Environmental Authorisation (EA).

IMPORTANT: *It is reiterated that the final BAR to be submitted to this Directorate must contain a letter from the George Municipality (Civil Engineering Services; Electrotechnical Services & Community Services) clearly stipulating that sufficient unallocated capacity exists in all the respective Municipal services to provide the proposal with all the required services without compromising existing services delivery. Please be sure to address the bulk engineering services and reticulation infrastructure.*

2.5. Stormwater management

The draft BAR indicates that stormwater management will be according to recommendations contained in the Red Book i.e., Guidelines for Human Settlement Planning and Design as compiled by the CSIR. It further indicates that the principals of Sustainable Urban Drainage Systems (SuDS) will be considered to minimise the amount and impact of stormwater leaving the site. In addition to the above, the services report also indicate that during the detail design phase, storm runoff from catchment areas will be calculated and catchpit inlets will be positioned and sized to match runoff volumes. The capacity of road kerbs will also be checked against major runoff volumes. Stormwater servitudes will be provided between erven where necessary to accommodate overland open channels with sufficient capacity to carry major storm runoff from the edge of the road to the nearest natural watercourse.

Although it is understood that the final detailed information regarding the stormwater management will not be available at this stage, it is required that at least a preliminary stormwater management plan be included in the final BAR in order for this Directorate to make an informed decision. Further to this, the George Municipality: Civil Engineering Services must provide written input on this aspect and confirm that the proposed designs conform to their standards.

Please be advised that due to the watercourse located in proximity of the site, it is important that the stormwater design is done in such a way as to ensure that the runoff from the development is not contaminated before entering the surrounding area. Very clear mitigation measures should be included in the report and Environmental Management Programme to ensure that this cumulative impact can be adequately mitigated.

2.6. Access

According to the Traffic Impact Assessment (TIA), the intersection at Glenwood Avenue will be insufficient to provide access to the proposed development. Instead, the TIA indicates that the developments obtain access from Road 5 instead of Road 2 and a secondary access will be provided to the Kraaibosch Development Area, (i.e. Road 5.1). Kindly elaborate on whether this would be in line with the overarching Kraaibosch Roads Masterplan for the Kraaibosch area and ensure the George Municipality: Civil Engineering Services provide written input on this aspect and confirm that the proposed designs conform to the standards that have been set.

2.7. Solid Waste Management

The draft BAR states that the collection of the waste will be by mutual agreement between the Developer and the Local Authority. You are required to consult the George Municipality: Community Services (Refuse Removal & Waste Management) and obtain written input on this aspect. Kindly include the availability of solid waste capacity from the Municipality in the confirmation of Services.

2.8. Synchronising applications in terms of other applicable legislation with the EIA process

■ National Water Act, 1998 (Act No 36 of 1998) ("NWA")

Upstream Consulting was appointed to compile the Freshwater Assessment and address any requirements in terms of the NWA. You are hereby reminded that sub-section 24C(11) to the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") which requires that "a person who requires an environmental authorisation which also involves an activity that requires a licence or permit in terms of any of the specific environmental management Acts (i.e., NWA), must simultaneously submit those applications to the relevant competent authority or licensing authority, as the case may be, indicating in each application all other licences, authorisations and permits applied for".

The required synchronisation has not been demonstrated on the DBAR and supporting documents. You are reminded that if these processes are not properly aligned, the lack of synchronisation; omission of any reports/information; or delay as a result thereof, may prejudice the success of this application for environmental authorisation. Kindly ensure that the *final BAR contains a final recommendation from the Breede-Olifants Catchment Management Agency (BOCMA) indicating whether there are any reasons why a water use license cannot be issued for the proposed development*

■ National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA")

The comment from Heritage Western Cape ("HWC") is noted and requests the submission of a consolidated plan showing the proposed development within the context of approved

developments adjacent to the site (to illustrate the proposal in context). Advise whether this was done and whether there were any further inputs received from HWC.

3. BAR Requirements

The BAR must contain all the information outlined in Appendix 1 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 1 of GN No. R. 982 may result in Environmental Authorisation being refused.

The Department awaits the submission of the BAR as prescribed by Regulation 19 of the EIA Regulations, GN No. R. 982 of 4 December 2014. In accordance with Regulation 19 of GN No. R. 982 of 4 December 2014, the Department hereby stipulates that the BAR must be submitted to this Department for decision within 90 days from the date of receipt of the application by the Department, calculated from 2 October 2024.

However, if significant changes have been made or significant new information has been added to the BAR, the applicant/EAP must notify the Department that an additional 50 days (i.e. 140 days from receipt of the application) would be required for the submission of the BAR. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information.

If the BAR 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 again.

4. Please note that the activity may not commence prior to an environmental authorisation being granted by this Directorate.
5. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.
6. The Department reserves the right to revise initial comments and request further information from you based on any new or revised information received.

Yours faithfully

pp_____

HEAD OF COMPONENT:

ENVIRONMENTAL IMPACT MANAGEMENT SERVICES (REGION 3)

DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

(reference: 16/3/3/1/D2/19/0033/24)

Copied to:

Mr Michael Bennett

EAP

E-mail: michael@sescs.net

Ms Carla Swanepoel

Candidate EAP

E-mail: carla@sescs.net

Mr. Clinton Petersen

George Municipality

E-mail: cpetersen@george.gov.za

physical 4th Floor, York Park Building,
York Street,
George 6530

website www.capenature.co.za

enquiries Megan Simons

telephone 087 087 3060

email msimons@capenature.co.za

Reference LE14/2/6/1/6/2/Farm RE21/195_Residential_
Kraaibosch

date 20 November 2024

Sharples Environmental Services cc,
P.O.Box 9087,
George,
6530

Attention: Mr Michael Bennett
By email: michael@sesc.net

Dear Mr Michael Bennett

THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED RESIDENTIAL DEVELOPMENT ON THE REMAINDER OF PORTION 21 OF FARM KRAAIBOSCH 195 (PIETER KOEN TRUST), GEORGE LOCAL MUNICIPALITY, WESTERN CAPE.

DEA&DP Reference: I6/3/3/1/D2/19/0033/24

CapeNature would like to thank you for the opportunity to review the above report. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application. CapeNature wishes to make the following comments:

According to the Western Cape Biodiversity Spatial Plan (Pool-Stanvliet *et al.* 2017)¹ the farm has Critical Biodiversity Areas (CBA 1: Terrestrial; Aquatic; CBA 2: Terrestrial) and Ecological Support Areas (ESA 1: Terrestrial; ESA 2: Restore). The freshwater features include a drainage line to the north east towards the Swart River which abuts the property to the north. Furthermore, the property is situated within the National Strategic Water Source Area for surface water for the Outeniqua region and serves as a water source protection for the Kaaimans River and Watercourse protection for the South Eastern Coastal Belt.

The fine-scale vegetation map describes the vegetation as Wolwedans Grassy Fynbos and Groot Brak River Floodplain (Vlok *et al.* 2008)². The National Biodiversity Assessment (Skowno *et al.* 2018)³ mapped the vegetation units as **Endangered** Garden Route Shale Fynbos and **Critically**

¹ Pool-Stanvliet, R., Duffell-Canham, A., Pence, G. & Smart, R. 2017. The Western Cape Biodiversity Spatial Plan Handbook. Stellenbosch: CapeNature.

² Vlok JHJ, Euston-Brown DIW, Wolf T. 2008. A vegetation map for the Garden Route Initiative. Unpublished 1: 50 000 maps and report for C.A.P.E. FSP Task Team, Oudtshoorn.

³ Skowno, A. L., Poole, C. J., Raimondo, D. C., Sink, K. J., Van Deventer, H., Van Niekerk, L., Harris, L. R., Smith-Adao, L. B., Tolley, K. A., Zengeya, T. A., Foden, W. B., Midgley, G. F. and Driver, A. 2019. National Biodiversity Assessment 2018: The status of South Africa's ecosystems and biodiversity. Synthesis Report. Pretoria, South Africa. 214 pp.

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Mr Mervyn Burton, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Mr Paul Slack

Endangered Garden Route Granite Fynbos (NEM:BA, 2022)⁴. Following a review of the dBAR and specialist assessment reports, CapeNature has the following comments:

1. Most of the surrounding area has been transformed by residential development. The rehabilitation of degraded CBAs will most likely be low. However, considering the hydrological network, it may be worth rehabilitating the degraded ESA that falls outside the proposed development plan (Pool-Stanvliet *et al.* 2017).
2. It is understood that the high sensitive areas which included the watercourse and steep slopes will not be developed and treated as no-go areas. Thus, the proposed development must not have any negative impacts on these areas.
3. The SWSA for the Outeniqua region is of national importance and their ecological functioning must be protected and maintained (Le Maitre *et al.* 2018)⁵. The property is within an important hydrological area therefore the smaller stream networks need to be managed especially the quality to ensure downstream ecosystems are not negatively affected. Furthermore, the Environmental Control Officer should ensure that the proposed development remains outside the 12 m aquatic buffer.
4. Soil erosion control measures, water and pollution run-off must be strictly implemented. All runoffs must be managed in a manner as to minimise or prevent erosion.
5. Invasive alien species have numerous negative impacts on ecosystem functioning. Removal of invasive alien plant species should be compliant with the National Environmental Management: Biodiversity Act (Act No.10 of 2004)⁶. Furthermore, we recommend aliens outside of the proposed area, also be removed during the alien clearing phase.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely,



Megan Simons
For: Manager (Conservation Intelligence)

⁴ National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004). The Revised National List of Ecosystems that are Threatened and in need of protection. 2022. Government Gazette No. 47526

⁵ Le Maitre, DC., Walsdorff, A., Cape, L., SeyAler, H., Audouin, M, Smith-Adao, L., Nel, J.A., Holland, M. and Witthüser. K. 2018. Strategic Water Source Areas: Management Framework and Implementation Guidelines for Planners and Managers. WRC Report No. TT 754/2/18. Pretoria: Water Research Commission.

⁶ Government Gazette No. 37885, GN No. R. 598 (2014) National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) Alien and Invasive Species Regulations, 2014.

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Mr Mervyn Burton, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Mr Paul Slack



REFERENCE: 4/10/2/K30C/KRAAIBOSCH 195/21(REM), GEORGE

DATE: 12 NOVEMBER 2024

SES ENVIRONMENTAL SERVICES
PO BOX 9087
GEORGE
6530

Attention: Mr M. Bennett

**RE: DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED RESIDENTIAL DEVELOPMENT
ON REMAINDER OF PORTION 21 OF FARM KRAAIBOSCH 195 (PIETER KOEN TRUST), GEORGE,
WESTERN CAPE**

Reference is made to the above mentioned Draft Basic Assessment Report made available to Breede-Olifants Catchment Management Agency (BOCMA) for comments.


The following are BOCMA comments relating to Draft Basic Assessment Report for the proposed residential development on Remainder of Portion 21 of Farm Kraaibosch 195, which should be adhered to:

1. The Breede-Olifants Catchment Management Agency has reviewed the draft basic assessment and has no objections to the proposed development.
2. Please note that comments dated 08 March 2024 provided by BOCMA are still applicable to the proposed development and must be adhered to.
3. As required by section 22 of the National Water Act, 1998 (Act No. 36 of 1998), a Water Use Authorisation is required prior to commencement with any water use activity contemplated in section 21 of National Water Act. Moreover, commencement with any water use activity without an authorisation as required by section 22 of National Water Act constitutes an offence in terms of section 151(1) (a) of the National Water Act. In terms of section 151(2) of the National Water Act, any person who contravenes is guilty of an offence and liable, on first conviction to a fine or an imprisonment of a period not exceeding five years or both such a fine and imprisonment.
4. In light of the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any water use contemplated in section 21 of National Water Act that is associated with the proposed development.
5. Kindly note that this office reserves the right to amend and revise its comments as well as to request any further information.



6. The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.
7. Should you wish to apply for a water use authorisation for unregistered water uses triggered by the proposed activities, you may apply electronically by logging onto the Department of Water and Sanitation (DWS) website at <http://www.dws.gov.za/e-WULAAS>.
8. Should you have further enquiries, the office can be contacted or alternatively contact Mr. SI Ndlovu at the above-mentioned contact number or on sndlovu@bocma.co.za

Yours faithfully,

pp 

MR. JAN VAN STADEN
CHIEF EXECUTIVE OFFICER (ACTING)

29 October 2024

SES Environmental Services
Unit 17, Cathedral Square
Cathedral Street
George
6530

Subject: Clarification on Building Height and Community Concerns – Groenkloof Development

Dear Mr. Bennett,

I write on behalf of the Groenkloof George Association regarding the planned development opposite the Groenkloof Hub. In reviewing the responses received, it appears that there are discrepancies or potential misunderstandings regarding the building heights referenced.

The Groenkloof Hub's current maximum height is 8.1 meters on the west side and 9 meters on the east side. The proposed building height of 12 meters would stand approximately 3 meters taller, which represents a 33% increase over the Hub. This is a significant difference that would impact the area's aesthetic and potentially diminish the quality of views for nearby residents.

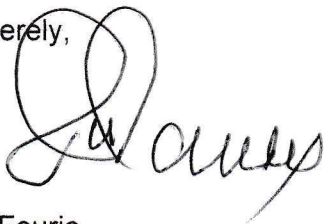
The response received indicates compliance with municipal height restrictions but notes that the new building's roof level would align with neighbouring structures due to its lower ground positioning. However, a 12-meter height still represents a notable departure from the current building heights in Groenkloof.

Our request remains that the design be reconsidered to align more closely with the existing landscape, reducing the visual impact on our community and protecting both the character and the property values of Groenkloof.

We look forward to engaging constructively on this matter and hope for a resolution that respects the interests of all stakeholders.

Thank you for your attention to this matter.

Sincerely,



Jan Fourie

Chairman, Groenkloof George Association



REFERENCE: 16/3/3/6/7/1/D2/19/0149/23
DATE OF ISSUE: 09 July 2024

The Director
Pieterkoen Development Company (Pty) Ltd
P.O. Box 2582
GEORGE
6530

Attention: Mr. Justin Branford

Cell: 083 284 0728

E-mail: Justin.Branford@igen.co.za

Dear Sir

**COMMENT ON THE PRE-APPLICATION REPORT FOR THE PROPOSED RESIDENTIAL DEVELOPMENT ON
REMAINDER OF PORTION 21 OF FARM 195 KRAAIBOSCH, GEORGE**

1. The abovementioned report received by the Directorate: Development Management (Region 3) hereinafter referred to as "this Directorate" on 24 February 2024, refers.
2. Kindly accept this Directorate's sincere apologies for the delay in responding to the above-mentioned report. The case has been re-assigned due to the fact that the previous case officer has resigned.
3. This Directorate has reviewed the report and comment as follows:
 - 3.1. It is understood from the Notice of Intent (NOI) that was previously submitted that neither the Environmental Assessment Practitioner (EAP) nor the specialist contested the "very high" sensitivity rating of the terrestrial sensitivity theme and therefore a Terrestrial Biodiversity Assessment will be undertaken as part of the assessment process. The pre-application BAR however contains a terrestrial compliance statement instead of a specialist report, which is in non-compliance with the protocol. Kindly ensure that this protocol is complied with going forward in the process.
 - 3.2. It is noted from the services report which civil services are available for the proposed development, however, the availability of services must be confirmed in writing by George Municipality: Technical Services that there is sufficient unallocated capacity available to provide the proposed development proposal with all the required services.
 - 3.3. In addition to the above, you are also required to consider resource conservation measures as part of the proposed development. Such measures should be incorporated into the design of the development proposal.
 - 3.4. The property contains a watercourse which will be affected during the development and stormwater will be fed into the streams and river system along a wide front allowing dissipated flow and seepage to all areas. It is therefore important that the stormwater design is done in such a manner to ensure that the runoff from the development is not contaminated, before entering the streams or system (Swart River) in the surrounding area. Specific mitigation measures should be

included in the Environmental Management Programme to ensure that the cumulative impact of stormwater on the quality of water in the streams and river system be adequately mitigated.

- 3.5. The proposed development encroaches onto Ecological Support Area (ESA) 1 and 2, also mapped as ESA 1 and 2, despite the finding of the Botanical Assessment that the site is severely degraded. The specialist further states that it is not expected that the proposed development will impact on the functionality of the biodiversity network. Cape Nature as custodian of biodiversity in the Western Cape must however confirm the findings of the specialist.
- 3.6. The Botanical Assessment also recommends as a mitigation measure that a fire break needs to be established and maintained around the development site. Kindly include the Southern Cape Fire Protection Agency (SCFPA) in the list of interested and affected parties in order to provide comment on the proposed development.
- 3.7. Synchronisation of processes

3.7.1. National Water Act, Act No. 36 of 1998 ("NWA")

You are hereby reminded that sub-section 24C(11) to the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") which requires that *"a person who requires an environmental authorisation which also involves an activity that requires a licence or permit in terms of any of the specific environmental management Acts (i.e., NWA), must simultaneously submit those applications to the relevant competent authority or licensing authority, as the case may be, indicating in each application all other licences, authorisations and permits applied for"*.

In light of the above, please advise the appointed Environmental Assessment Practitioner (EAP) and the consultant responsible for the Water Use License ("WUL") process to liaise; and consult with the relevant authority, the Breede-Olifants Catchment Management Agency ("BOCMA") urgently. It is strongly advised that the EAP also include the BOCMA in the pre-application meeting with this Department.

Please be advised of the required synchronisation between the EIA process and the Water Use License Application ("WULA") process (if the latter is required). You are reminded that if these processes are not properly aligned, the lack of synchronisation; omission of any reports/information; or delay as a result thereof, may prejudice the success of this application for environmental authorisation.

All specialist reports submitted as part of the BAR (including those submitted for consideration and which also may form part of the WULA) must comply with the requirements of Appendix 6 of the Environmental Impact Assessment Regulations 2014.

Also note that the final BAR must have a final recommendation from the BOCMA indicating whether there are any reasons why a WULA cannot be issued for the proposed development.

3.7.2. National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA")

You are reminded that section 38 of the NHRA sets out the requirements regarding the integration of the decision-making process with that of the EIA Regulations 2014, however, under the provision that the necessary information is submitted and any comments and recommendations of the relevant heritage resources authority (HWC) with regard to such development have been provided and taken into account prior to the granting of the authorisation.

Kindly be reminded that, if Section 38 of the NHRA is triggered, the Standard Operating Procedure between Heritage Western Cape and this Department must be followed. If Section 38 is applicable to the proposed development, then the proponent/applicant is required to submit a Notice of Intent to Develop ("NID") to Heritage Western Cape and attach a copy to thereof to the EIA application form. If Heritage Western Cape requires a Heritage Impact

Assessment, the Heritage Impact Assessment must be undertaken as one of the specialist studies of the EIA process to be undertaken in terms of the EIA Regulations, 2014.

3.8. Section E pertaining to Need and Desirability of the proposal is noted. However, it is clear that this section only partially addresses some of the key questions listed on pages 10 – 18 of the Department's Guideline on Need and Desirability (March 2013). It is of outmost importance that the proponent/EAP specifically and explicitly demonstrates how the need and desirability considerations in the said guideline have been taken into account by comprehensively addressing these key questions in the final BAR that will be submitted.

4. Please note that the activity may not commence prior to an environmental authorisation being granted by this Directorate.
5. This Department reserves the right to revise or withdraw initial comments or request further information from you based on any new or revised information received.

Yours faithfully

pp _____

**HEAD OF DEPARTMENT
ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 3
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Copy:

Mr. Michael Bennett
Ms. Carla Swanepoel
Mr. Clinton Pedro

EAP
Candidate EAP
George Municipality

E-mail: michael@sescs.net
E-mail: carla@sescs.net
E-mail: cpetersen@george.gov.za



BREDE-OLIFANTS
CATCHMENT MANAGEMENT AGENCY

101 York Street 3rd Floor Room 302 George 6530, P.O Box 1205 George 6530

Enquiries: SI Ndlovu

Tel: 023 346 8000

Fax: 044 873 2199

E-mail: sndlovu@bocma.co.za

REFERENCE: 4/10/2/K30C/KRAAIBOSCH 195/21(REM), GEORGE

DATE: 08 MARCH 2024

SES ENVIRONMENTAL SERVICES
PO BOX 9087
GEORGE
6530

Attention: Mr M. Bernnett

RE: NOTICE OF THE PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE PROPOSED RESIDENTIAL DEVELOPMENT ON REMAINDER OF PORTION 21 OF FARM KRAAIBOSCH 195 (PIETER KOEN TRUST), GEORGE, WESTERN CAPE

Reference is made to the above mentioned Draft Basic Assessment Report made available to Breede-Olifants Catchment Management Agency (BOCMA) for comments.

The following are BOCMA comments relating to Draft Basic Assessment Report for the proposed residential development on Remainder of Portion 21 of Farm Kraaibosch 195, which should be adhered to:

1. There are several watercourses, wetlands, streams and rivers, that were identified in the development site, thus the proposed residential development occurs within the regulated area of a watercourse, it triggers water uses in terms of section 21(c) & (i) of the National Water Act, 1998 (Act No. 36 of 1998) and must be authorised. These sections refer to the impeding or diverting the flow of water in a watercourse and altering the bed, banks, course or characteristics of a watercourse respectively. The regulated area of a watercourse is defined as follows:
 - a) *The outer edge of the 1 in 100-year flood line and/or delineated riparian habitat, whichever is the greatest distance, measured from the middle of the watercourse of a river, spring, natural channel, lake or dam;*

RE: NOTICE OF THE PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE PROPOSED RESIDENTIAL DEVELOPMENT ON REMAINDER OF PORTION 21 OF FARM KRAAIBOSCH 195 (PIETER KOEN TRUST), GEORGE, WESTERN CAPE

- (b) In the absence of a determined 1 in 100-year flood line or riparian area the area within 100m from the edge of a watercourse where the edge of the watercourse is the first identifiable annual bank fill flood bench (subject to compliance to section 144 of the Act); or*
- (c) A 500 m radius from the delineated boundary (extent) of any wetland or pan.*
- 2. Please note that no water shall be derived from any water resource and used on Remainder of Portion 21 of Farm Kraaibosch 195 for any purposes without prior approval by means of a water use authorisation in terms of section 22 of the National Water Act, 1998 (Act No. 36 of 1998).
- 3. The water supply of the proposed residential development that will be provided for by a Water Services Provider (WSP) i.e. municipality, there must be an agreement in place between the user and the municipality and water charges must be paid directly to the municipality.
- 4. The applicant must ensure that no contaminated stormwater from the development is discharged into the wetlands, streams and rivers adjacent to the development site.
- 5. The applicant is advised to take all reasonable control measures to prevent any movement of soils that might cause sedimentation of the Swart river and its tributaries during the construction phase of the development.
- 6. Please note that if there will be storage of oil, diesel, hydraulic fluids and/or grease onsite used for construction heavy machinery; it is recommended that the storage areas for these fluids be bunded with cement and in such a manner that any spillages can be contained and reclaimed without causing any pollution to the ground and surface water resources.
- 7. As required by section 22 of the National Water Act, 1998 (Act No. 36 of 1998), a Water Use Authorisation is required prior to commencement with any water use activity contemplated in section 21 of National Water Act. Moreover, commencement with any water use activity without an authorisation as required by section 22 of National Water Act constitutes an offence in terms of section 151(1) (a) of the National Water Act. In terms of section 151(2) of the National Water Act, any person who contravenes is guilty of an offence and liable, on first conviction to a fine or an imprisonment of a period not exceeding five years or both such a fine and imprisonment.
- 8. In light of the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any water use contemplated in section 21 of National Water Act that is associated with the proposed development.
- 9. Kindly note that this office reserves the right to amend and revise its comments as well as to request any further information.
- 10. The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.
- 11. Should you wish to apply for a water use authorisation for unregistered water uses triggered by the proposed activities, you may apply electronically by logging onto the Department of Water and Sanitation (DWS) website at <http://www.dws.gov.za/e-WULAAS>.

RE: NOTICE OF THE PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE PROPOSED RESIDENTIAL DEVELOPMENT ON REMAINDER OF PORTION 21 OF FARM KRAAIBOSCH 195 (PIETER KOEN TRUST), GEORGE, WESTERN CAPE

12. Should you have further enquiries, the office can be contacted or alternatively contact Mr. Si Ndlovu at the above-mentioned contact number or on sndlovu@bocma.co.za

Yours faithfully,

pp *Jan van Staden*

**MR. JAN VAN STADEN
CHIEF EXECUTIVE OFFICER (ACTING)**



11 March 2024

Michael Bennett
Sharples Environmental Services
17 Cathedral Square
George
6529

**COMMENT ON THE PROPOSED RESIDENTIAL DEVELOPMENT ON REMAINDER OF PORTION
21 OF FARM 195 KRAAIBOSCH (PIETER KOEN TRUST), GEORGE, WESTERN CAPE**

Dear Mr Bennett

Thank you for including Earp Construction (Pty)Ltd as an effected party caused by the proposed development on the Remainder of Portion 21 of Farm 195 Kraaibosch.

Please find our concerns as set out below.

It is noticed that the stormwater along Pieterkoen Crescent on the western side of the development have an underground stormwater system on the western side of the road. Our concern is that the larger stormwater events will not be intercepted by this system and stormwater will enter the erven on the western perimeter of the Erf 21/195 development via driveways and over kerbs. This will result in large quantities of stormwater collecting along the newly built Eastern perimeter wall of Eerf 88/195 and could cause damage to the wall and flood the eastern erven of Erf 88/195 along this wall.

It is requested that the developer of Erf 21/195 rather install the stormwater system along Pieterkoen Crescent, on the eastern side of the road, by creating a cross fall in the road from west to east. The larger stormwater events will hence be directed to flow along the eastern side of the road to the low points (north & south) in Pieterkoen Crescent where the stormwater will be discharged away from the eastern perimeter of Erf 88/195.

It is further noticed that a sewer pipe is proposed along the western perimeter of Erf 21/195. This sewer pipe is to be a minimum of 1,5m away from the perimeter wall of Erf 88/195 to prevent undermining of perimeter wall foundation during construction of sewer pipe.

88 Plattner Boulevard
George, 6530

PO Box 1680
George, 6530

Tel: 044 873 0443
Fax: 044 873 0169

www.earp.co.za
office@earp.co.za



No backfilling will be allowed against the perimeter wall of Erf 88/195 as the wall was not designed nor constructed as a retaining wall

Please refer to attached notes on plan G5215BA-CE-101.

Regards

A handwritten signature in black ink, appearing to be "GJ Earle", written over the printed name. The signature is fluid and stylized, with a large loop at the end.

GJ Earle

	Initials	Date
Designed	CAL	28-06-23
Drawn	CAL	28-06-23
Project Eng	NA	29-06-23
Approved	NA	29-06-23

SCALE 1 : 150

Title

INTERNAL SERVICES
LAYOUT PLAN WITH
TEMPORARY SEWER OPTION


18 March 2024

SES Environmental Services
Unit 17, Cathedral Square
Cathedral Street
George
6530

For the attention of: Mr Michael Bennett

Subject: Concerns Regarding Proposed Residential Development, Portion 21 Farm 195, Kraaibosch, George, Western Cape

Reference to Notice board shown below, displayed in Glenwood Drive, George



EMAIL: info@sesc.net WEBSITE: www.sesc.net
ADDRESS: Unit 17 Cathedral Square,
Cathedral Street, George, 6530
PO BOX: 9087, George, 6530

CAPE TOWN
TEL: +27 (0) 21 554 5195 FAX: +27 (0) 86 575 2869
EMAIL: betsy@sesc.net WEBSITE: www.sesc.net
ADDRESS: Tableview, Cape Town, 7441
PO BOX: 443, Milnerton, 7435

NOTICE OF BASIC ENVIRONMENTAL IMPACT ASSESSMENT (EIA)
INVITATION TO REGISTER AS AN INTERESTED & AFFECTED PARTY (I&AP) AND COMMENT ON
THE PRE-APPLICATION BASIC ASSESSMENT REPORT AND HERITAGE IMPACT ASSESSMENT
THE RESIDENTIAL DEVELOPMENT ON REMAINDER OF PORTION 21 OF FARM 195
KRAAIBOSCH (PIETERKOEN TRUST), GEORGE, WESTERN CAPE.
DEADP Ref: 16/3/3/6/7/1/D2/19/0149/23
HWC CASE: HWC22112306AM1122

LOCATION: The remainder of portion 21 of the Farm No 195, George, Western Cape.

DEVELOPMENT DESCRIPTION: The proposed development will consist of:

- Single Residential II – 3 storey Apartments (128)
- Business Zone III – Neighbourhood shop with flats above
- Historic Precinct (clubhouse, restaurant, gym, etc)
- High density Group housing (cottages – 40)
- Group Housing (47)
- Single Residential Erven (101)
- Entrance Control


EIA & LISTED ACTIVITIES: A Basic Environmental Impact Assessment is being undertaken in terms of the amended 2014 EIA Regulations (GN No R. 324 – 327 of April 2017), as part of the application for Environmental Authorisation from the Department of Environmental Affairs & Development Planning. The proposed development triggers the following "listed activities" in terms of the 2014 amended EIA Regulations: LN 1 (GN No. R. 327) Activities 12, 19, 24, 27 & 28. LN 3 (GN No. R. 324) Activity 4, 12, 14 & 15.

MORE INFORMATION: is in the draft Pre-Application Basic Assessment Report available on the website www.sesc.net (under the "public documents" section), or from the contact details provided.

OPPORTUNITY TO PARTICIPATE: Interested & Affected Parties (I&APs) are hereby invited to register on the database in order to receive further correspondence regarding the proposed project, and/or to provide comment on the draft Pre-Application Basic Assessment Report. To register or comment please send your full name, contact details, preferred method of contact & an indication of any direct business, financial, personal or other interest which you have in the application, to SES at the contact details provided below. Please note that correspondence throughout the remainder of the EIA process will be distributed to Registered I&APs only. **I & AP REGISTRATION AND COMMENT PERIOD: 23 February 2024 – 28 March 2024**

FOR MORE INFORMATION CONTACT: Michael Bennett / Tel: 044 873 4923 / Fax: 086 575 2869 / Email: michael@sesc.net / P.O. Box 9087, George, 6530

• Environmental Impact Assessments • Basic Assessments • Environmental Management Planning
• Environmental Control & Monitoring • Water Use License Applications • Aquatic Assessments



Furthermore, referring specifically to A2 below as documented in your Site development plan obtained from www.sesscc.net – Public Information - Appendix B.

A1	High Density Town Housing Total 44
A2	Single Residential 2 Zoning for 3 Storey Apartments Total 84
B	Business Zone 3 for Neighbourhood Shop with 9 x Flats above & Day Care / Pre School Facility.
C	Historic Presinct (Clubhouse, Restaurant, Gym etc.)
D	High Density Group Housing (Cottages) Total 36
E	Group Housing Total 64
F	Single Residential Erven Total 79
G	Group Housing Total 5
H	Entrance Control
I	Entrance off Glenwood Drive
	Total Single Residential Zone 2 Opportunities = 312
	Area Available for Housing = 17ha



Dear Mr Bennet,

I am writing to you on behalf of the Groenkloof George Association regarding the proposed development of Portion 21 Farm 195, Kraaibosch, opposite the Groenkloof Hub. We appreciate the opportunity to express our concerns and comments regarding this development.

As the Chairman of the Groenkloof George Association, it is my responsibility to advocate for the interests of our community and ensure that any developments within our vicinity align with the character and aesthetics of our neighbourhood.

Firstly, it has come to our attention that part of the proposed development includes a three-story building. Our reference is displayed above from information obtained from your website. We must emphasize that our estate, Groenkloof, has historically maintained a certain architectural aesthetic characterized by predominantly stand alone residential units and maximum, two-story residential buildings. Introducing a three-story structure into our neighbourhood would disrupt this harmony and detract from the overall visual appeal of our surroundings.

Moreover, the construction of a three-story building directly opposite the Groenkloof Eden development raises significant concerns regarding the impact on the residents' views and property values. The residents of Groenkloof Eden will enjoy a view of the Outeniqua mountain, which contributes greatly to the desirability and value of their properties. Introducing a tall structure that obstructs or diminishes this view would undoubtedly have adverse effects on their quality of life and property investments.

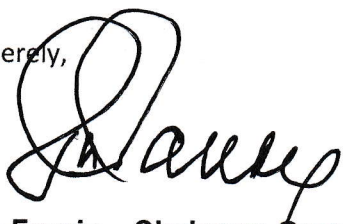
We understand that progress and development are inevitable, but we firmly believe that any new constructions must be sensitive to the existing environment and respectful of the concerns of the local community. With this in mind, we kindly request that you reconsider the design of the proposed three-story building and explore alternatives that would better integrate with the surrounding landscape.

Specifically, we propose that the three-story building be redesigned as a two-story structure. This adjustment would not only preserve the architectural integrity of our neighbourhood but also alleviate the concerns regarding the impact on views and property values.

In conclusion, we urge you to take our concerns into serious consideration during the planning stages of this development. We are open to constructive dialogue and collaboration to find a mutually beneficial solution that respects the interests of all stakeholders involved.

Thank you for your attention to this matter. We eagerly await your response and hope to work together towards a resolution that preserves the unique character and beauty of Groenkloof.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jan Fourie', written over the word 'Sincerely,'.

Jan Fourie – Chairman Groenkloof George Association (GGA)

(The GGA is a legal person which represents all the Groenkloof George Home Owners Associations)

