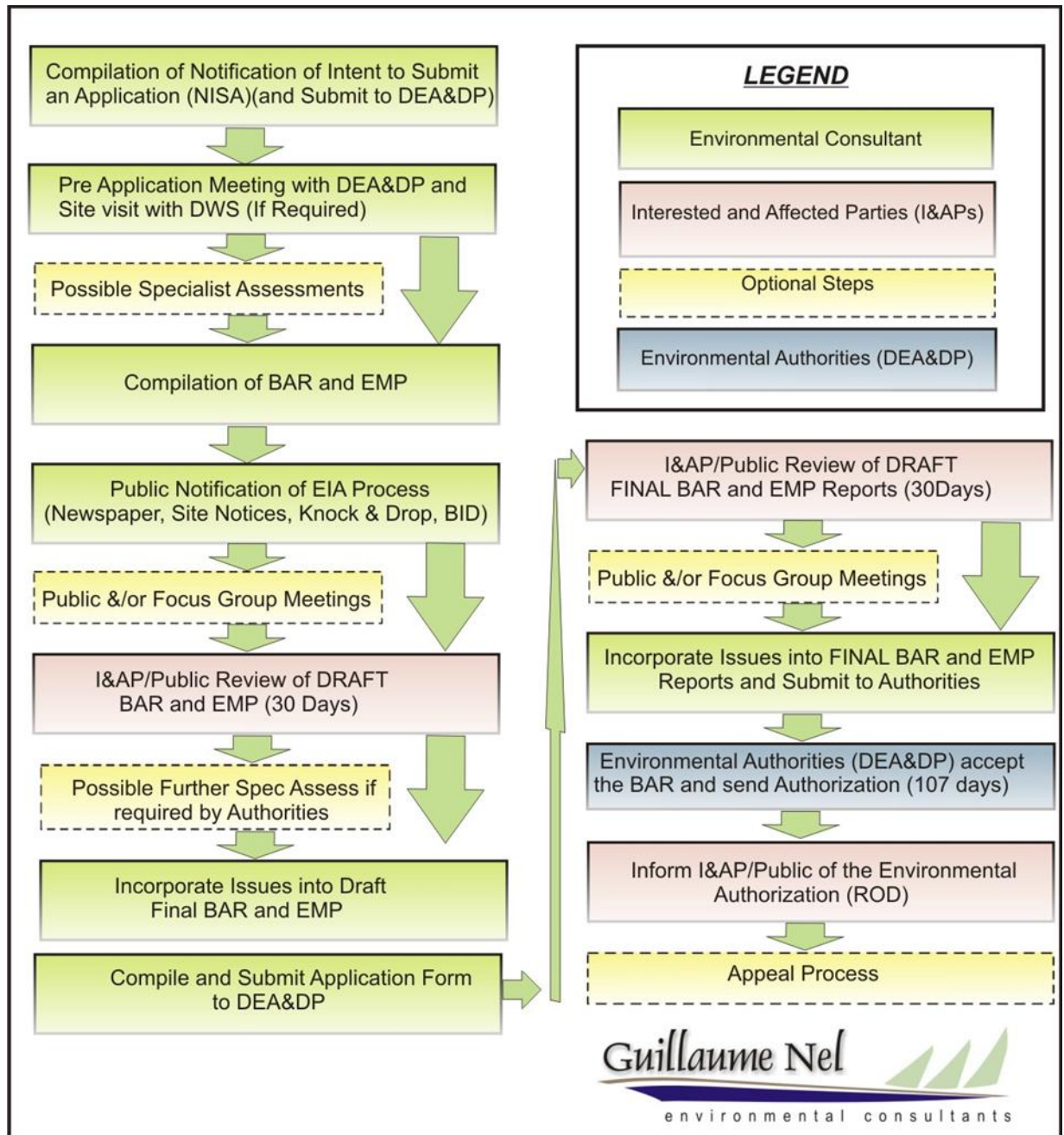


PUBLIC PARTICIPATION

1. PUBLIC PARTICIPATION PROCESS

Public participation is the involvement of all parties who potentially have an interest in a development or project or may be affected by it. The principal objective of public participation in an Environmental Impact Assessment process, in particular this Basic Assessment, is to inform and enrich decision-making.



2. PROCESS FOLLOWED TO DATE

A Notice of Intent to Develop (NID) application was submitted to Heritage Western Cape on the 28th of November 2019. Heritage Western Cape reviewed the NID during the period of the 28th of November 2019 to the 19th of December 2019. On the 3rd of December 2019, Heritage Western Cape issued a Record of Decision stating that “*there is no reason to believe that the development will impact on heritage resources*”.

A Notice of Intent to apply was submitted to the Department of Environmental Affairs and Development Planning on the 9th of December 2019.

The first Draft Basic Assessment Report was drafted and made available to the relevant commenting authorities and to the general public. The first draft Basic Assessment Report was submitted to the Department of Environmental Affairs and Development Planning (DEA&DP) on the 24th of February 2020. Background Information Documents were hand delivered to residents and businesses within a 100-meter radius of the proposed development site. Notification letters were sent via registered post to potentially affected state departments, NGO's and commenting authorities. The first Draft Basic Assessment Report was delivered to the relevant authorities and made available at the local public library in Worcester for public review.

The following process was undertaken to facilitate the initial 30-day Public Participation Period, which commenced on the 24th of February 2020 and lapsed on the 27th of March 2020.

2.1. NEWSPAPER ADVERTISEMENT

An advertisement, notifying the public of the Basic Assessment process and requesting Interested and Affected Parties (I&APs) to register with and submit their comments to Guillaume Nel Environmental Consultants (GNEC), was placed in the Worcester Standard newspaper on Thursday the 20th of February 2020.

2.1. Site notice

To inform surrounding communities and immediately adjacent landowners of the proposed development, one set (including one Afrikaans and one English) of site notices were erected on site at visible and accessible locations close to the site on **20th of February 2020**.

Notice boards were fixed at two separate locations on the boundary of the proposed development site. Two site notices (being Afrikaans and English) were placed on the South West Boundary of the site, with the remaining two being placed on the Southern Boundary of the proposed site. All site notices were placed adjacent to access roads to the proposed sites.

2.2 Direct notification of identified I&APs

Identified I&APs, including key stakeholders representing the following sectors, were

directly informed of the proposed development by post on **20 February 2020**.

- Local Authorities
- Provincial Authorities
- Service providers
- Ward Councillors
- Non-governmental organizations, and
- Directly adjacent landowners.

2.3 Hand-delivered notifications

Letters were hand-delivered to adjacent landowners within 100-meters of the proposed development site on the **20 February 20120** to notify and inform them of the proposed project.

2.4 Concerns raised by I&APs

I&APs registered by completing registration forms and forwarding comments by email, fax, post and telephonically.

Comments received from I&APs are captured on a stakeholder database, acknowledged by personal letters and forwarded to the relevant environmental specialists for consideration.

3. COMMENT AND RESPONSE REPORT

Comments and issues of concern contributed by I&APs were listed, along with the I&APs name and means of communication in the Comment and Response Report.

4. CONCLUSION

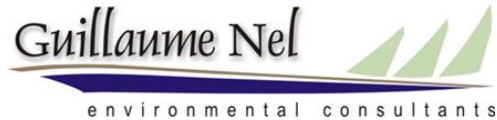
The most significant concerns to be raised by I&APs is summarised here as a conclusion to the Public Participation section:

- A comment from the Breede- Gouritz Catchment Management Agency (“BGCMA”) or the relevant water management authority must be included in the BAR.
- BGCMA requested that the sources of water for the additional reservoir should be indicated, along with the authorisation of supply for the proposed development.
- BGCMA requested that it should be indicated how the nearby artificial wetland will be protected from the impacts of the proposed construction of the additional reservoir.
- It the route of the pipeline in relation to the nearby wetland should be indicated.

- DEADP requested that the Construction and Operational Environmental Management Programme (“EMPr”) contains recommendations and mitigation measures based on the feedback from the organs of state.
- DEADP requested that details regarding the implementation of the recommendations made by the Botanical Impact Assessment must be addressed in the final BAR and the relevant sections of the EMPr must be amended to include these recommendations.
- CapeNature requested that an early spring/late winter survey must be undertaken to determine if search and rescue of species of conservation concern is necessary.
- CapeNature also requested that a site scan should be undertaken for tortoises and other reptiles prior to heavy machinery moving onto the site. These should be relocated by a professional familiar with these species.

I&APs to respond and who are most likely to be affected by the proposed development are:

- Directly adjacent neighbours
- Provincial Authorities



First Public Participation Process		
Issues / comment raised by:	Date	Means of communication
Siyabulela Lupa (BGCMA)	3 April 2020	Email
Comment Received		
<p>Good Morning Heloise</p> <p>As we all aware of the lockdown which enforced our offices to close thereby, forcing us to work remotely in different set ups though.</p> <p>For the lockdown period, this email will serve as formal comments.</p> <p>In trying to determine some of the Section 21 water uses of the National Water Act (NWA), 1998 (Act No 36 of 1998) that could be triggered by the proposed activity, the following questions arose:</p> <ul style="list-style-type: none"> a) What would be the source of water for the additional 20 000 m³ capacity Reservoir. Authorisation for the supply must be provided. b) How would the nearby wetland as advocated by the Botanical Report (Photo 5 on p10) be protected from the impacts of the proposed construction of a new 20 000 m³ capacity Reservoir. c) What is the route of the pipeline in relation to the nearby wetland. <p>The response to the above should also form part of the BAR.</p> <p>PLEASE NOTE: Any activity that takes place within a Regulated Area of a Watercourse triggers Section 21 (c) & (i) water uses of NWA and needs to be authorised.</p> <p>I have attached the General Authorisation for Section 21 (c) & (i) water uses of NWA for ease of reference on Regulated Area of a Watercourse (p4).</p> <p>I hope you will find the above in order.</p>		
Response		
Dear Siyabulela.		



Thank you for your comments on the proposed expansion of the existing preloads reservoir system located on the remainder of erf 19909, Worcester, western cape.

The proposed reservoir will be located adjacent to the exciting Pre-loads system. The source of water that will therefore come from the current bulk supply from the Stettynskloof Dam.

It should be noted that the nearby artificial wetland will be marked off as a no-go area during the construction phase. The route of the proposed pipeline which will connect the additional reservoir will not impact upon the artificial wetland, due to it being located to the North of the reservoir system.

Although the proposed works will be done within the 500m radius of a wetland, the wetland will not be physically affected by the proposed development. It should be noted that the wetland is an artificial wetland due to the overflow from the existing reservoir. The wetland will not be affected in any way by the proposed development.

It is in GNEC's option that a water use license will not be require for the proposed reservoir, due to the proposed development not triggering any activity in terms of the National Water Act, 1998 (Act No. 36 of 1998).

«Name»	«Date of Comms»	«Means of Comms»
Alana Duffell-Canham	6 th March 2020	Email

Comment Received

RE: Proposed additional reservoir at the preloads reservoir system on remainder of Erf 19909, Worcester – Draft Basic Assessment Report. DEA&DP Ref: 16/3/3/6/7/1/B2/32/1433/19

CapeNature would like to thank you for the opportunity to comment on this application and wish to make the following comments:

1. The proposed additional reservoir location is adjacent to four existing reservoirs. According to the South African Vegetation Map (2018) the site supports Robertson Karoo vegetation. The botanical specialist concurs with this classification. Robertson Karoo is not currently listed as a threatened habitat type although it should be noted that there are finer-scale units within Robertson Karoo, some of which are rarer and more threatened than others.
2. The site does fall within a Critical Biodiversity Area (CBA) which has been determined as such in order to protect the vegetation type on site, maintain an ecological corridor and to provide habitat for tortoise species and other small vertebrates.
3. The inclusion of some of the transformed areas around the existing reservoirs is not an error of not detecting certain features but rather an issue of scale. It should be noted that it cannot be determined by specialists or DEA&DP whether an area qualifies as CBA as CBAs have been determined at a province wide scale with many



factors/features other than vegetation type and condition being taken into consideration. If CBA status needs to be queried it must go through the verification protocol developed by Cape Nature.

4. Page 7 of the report refers to “Critical Biodiversity Ecosystem” – this is not an official term. Should it perhaps rather state Critically Endangered ecosystem? In addition, the botanical specialist refers to the “Worcester Biodiversity Network”. Please note that this is also not an official term or product. In the Western Cape only the City of Cape Town has a “biodiversity network” or “bionet” which has been added into the Western Cape Biodiversity Spatial Plan (WCBSP) 2017. The CBAs and corridors indicated in the specialist report is an extract from the WCBSP, which as mentioned above is a provincial product.
5. That being said, we do acknowledge that the site is partially degraded, adjacent to existing reservoirs and no new access roads will be required. We therefore do not object to the proposed additional reservoir providing that the following conditions are implemented:
 - An early spring/late winter (end July to mid-September) survey must be undertaken to determine if search and rescue of Species of Conservation Concern is necessary. *Ixia mostertii*, which is an Endangered geophyte has been recorded in close proximity to the reservoirs and although it was not recorded by the botanical specialist this could be an issue of seasonality.
 - No new roads/tracks should be created to the west of the proposed reservoir and natural vegetation should be allowed to re-establish post construction on all areas not required to access the reservoirs.
 - A site scan should be undertaken for tortoises and other reptiles prior to heavy machinery moving onto the site. These should be relocated by a professional familiar with these species.
 - Following this application, if additional reservoirs are required for Worcester, other site alternatives outside of Critical Biodiversity Areas should be investigated.
6. The Environmental Management Programme is highly generic and needs to be updated with site specific requirements.

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

Response

Dear Alana.

Thank you for the provided comments on the proposed expansion of the existing Pre-loads Reservoir System in Remainder of Erf 19909, Worcester.



1. GNEC agrees with this statement. It has been noted that some endangered vegetation is located on the proposed development site. It has therefore been suggested that search and rescue of these species should occur prior to the construction period, where thereafter, the species will be used for rehabilitation of the disturbed areas post construction,
2. This is correct, the site falls on the edge of a CBA area. The proposed development and its associated works will be contained to an area of 5144 m² in total. It should however be noted that DEA&DP have confirmed that the vegetation is not gazetted as endangered or critically endangered.
3. Noted. The proposal development will not impact on a large area of natural vegetation. The proposed development will be contained to an area of approximately 5144m² of which a large area has been transformed. The total area of the proposed development site includes the existing access road. The proposed development will not significantly compromise ecological connectivity, therefore there is no need to undertake a CBA verification protocol. As previously mentioned, DEA&DP have confirmed that the vegetation is not gazetted as endangered or critically endangered.
4. Noted. The necessary corrections have been made.
5. Noted. It has been added to the EMPr that a site scan will be undertaken prior to the construction period to ensure that no tortoises and other reptiles will be affected by the construction of the additional reservoir. No site alternatives have been assessed as the subject property is zoned for authority use and that due to the fact that the additional reservoir will be located adjacent to the existing system, the overall impacts of the proposed development will be minimised.

A botanical scan was conducted by Mr. Mark Berry in August of 2020 to determine if the species *Ixia mostertii*, which is an endangered geophyte recorded nearby, occurs on the site. During the property rescan, following species additional to the previous survey was recorded (the majority of these outside the footprint area):

- *Eriocephalus africanus*
- *Felicia filifolia*
- *Othonna arbuscula*
- *Othonna retrofracta*
- *Roepera flexuosa*
- *Tetragonia cf fruticosa*
- *Bulbinella nutans*
- *Massonia depressa*
- *Oxalis obtuse*

It should be noted that none of these are Species of Conservation Concern. No recordings of *Ixia mostertii* was made on-site or directly below the site.



During the construction phase, the existing fire road (Brand pad) will be used as access to the proposed development site. There after the existing access road will be rerouted adjacent and to the West of the new reservoir development. This access road will be used during the operational phase. The development of the access road to the west is unfortunately unavoidable as the reservoir does require ongoing maintenance during the operational phase. If the access road is not rerouted adjacent and to the West of the new reservoir, no access to the proposed development site for maintenance purposes will be possible.

A rehabilitation report has been compiled by GNEC. The rehabilitation plan includes an alien clearing management plan, a search and rescue of endemic species and rehabilitation plan of the proposed development area. Please refer to Appendix J for the rehabilitation report.

6. The EMPr has been updated to ensure that all mitigation measures as proposed by the commenting authorities as well as the botanical impact assessment has been included, ensuring that the proposed development has minimal impact on its surroundings.

«Name»	«Date of Comms»	«Means of Comms»
Saa-rah Adams	31 March 2020	Email

Comment Received

Dear Sir,

COMMENTS ON THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT (BAR) FOR THE NOTICE OF INTENT TO DEVELOP A NEW RESERVOIR ON THE REMAINDER OF ERF NO. 19909, WORCESTER.

1. The abovementioned document dated 24 February 2020 received by this Department on 25th February 2020 and the Department's correspondence dated 2 March 2020, refer.
2. Following review of the information submitted to this Department, it is noted:
 - 2.1. The proposed development site is located north of the N1 highway within the town of Worcester.
 - 2.2. There is an existing Worcester Pre-Load Reservoir Reticulation system on site consisting of four 13.37 ML reservoir tanks which services the town of Worcester. However due to the rapid growth in residential and commercial development, the Worcester Pre-Load Reservoir Reticulation system has insufficient capacity to supply the existing and future developments within the area.
 - 2.3. The proposal entails the development of a new 20.0 ML reservoir with associated pipeline infrastructure on the Remainder of Erf No. 19909, Worcester.



- 2.4. The proposed reservoir and associated pipeline will be connected to the operational system of the existing Worcester Pre-Load Reservoir Reticulation system.
 - 2.5. A Large portion of the site is identified as a Critical Biodiversity Area. Available mapping information resources indicted that the site is covered in Robertson Karoo, which is an ecosystem categorised as Least Treated in terms of Section 52 of the national Environmental Management: Biodiversity Act (2008).
 - 2.6. The total area of land to be cleared for the development is approximately 5144m².
3. The Department's comments are the following:
- 3.1. Having considered the information contained in the pre-application draft BAR, you are hereby advised that only those activities applied for will be considered for authorisation. The onus is on the applicant to ensure all the applicable listed activities are applied for and assessed as part of the Environmental Impact Assessment ("EIA") process. Omission of any activity may invalidate the application.
 - 3.2. Please ensure the Construction and Operational Environmental Management Programme ("EMPr") contains recommendations and mitigation measures based on the feedback from the organs of state. For example, in the biodiversity survey dated January 2020 compiled by Mark Berry Environmental Consultants it states that is expected that the disturbed areas will be rehabilitated with locally occurring species. It further indicates that the management of alien invasive species such as port jackson and red sesbania should be an ongoing management requirement during operational phase of the development. Details regarding the implementation of these recommendations must be addressed in the final BAR and the relevant sections of the EMPr must be amended to include these recommendations.
 - 3.3. A comment from the Breede- Gouritz Catchment Management Agency ("BGCMA") or the relevant water management authority must be included in the BAR. Please be advised that in terms of the Standard Operating Procedure between this Department and the DWS, which came into effect on 1 July 2017, the Environmental Assessment Practitioner must submit a written water use application request to the DWS to determine whether or not a General Authorisation or WULA in terms of the National Water Act, 1998 (Act No. 36 of 1998) is required. In terms of the Agreement for the One Environmental System (section 50A of the NEMA and sections 41(5) and 163A of the NWA) the processes for a WULA and for an EIA must be aligned and integrated with respect to the fixed and synchronised timeframes, as prescribed in the EIA Regulations, 2014, as well as the 2017 WULA Regulations. If a WULA is required, proof of submission to BGCMA and all information related to the WULA application must be included in the BAR.



- 3.4. Comments from, but not limited to, the following relevant authorities must be obtained during the Public Participation Process and included in the BAR submitted for decision-making:
 - CapeNature; and
 - Department of Water and Sanitation or the relevant water management authority.
- 3.5. The Public Participation Process must comply with the requirements of Regulation 41 of the EIA Regulations 2014, and proof of compliance with all the steps undertaken must be included in the Final BAR.
- 3.6. Omission of any required information in terms of Appendices 1 and 4 of the EIA Regulations 2014, with regards to the final submission of the BAR and EMPr, respectively to the Department, may result in the application for Environmental Authorisation being refused.
- 3.7. Be advised that an original signed and dated applicant declaration is required to be submitted with the final BAR to this Department for decision-making. It is important to note that by signing this declaration, the applicant is confirming that they are aware and have taken cognisance of the contents of the report submitted for decision-making. Furthermore, through signing this declaration, the applicant is making a commitment that they are both willing and able to implement the necessary mitigation, management and monitoring measures recommended within the report with respect to this application.
- 3.8. In addition to the above, please ensure that original signed and dated Environmental Assessment Practitioner ("EAP") declaration is also submitted with the final BAR for decision-making.
4. Kindly quote the abovementioned reference number in any future correspondence in respect of the application.
5. Please note that it is an offence in terms of Section 49A(1)(a) of the NEMA for a person to commence with a listed activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity. Failure to comply with the requirements of Section 24F of the NEMA will result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment.
6. This Department reserves the right to revise or withdraw any comments or request further information from you based on any information received.



Yours faithfully.

Response

Dear Saa-rah.

Thank you for the provided comments on the proposed expansion of the existing Pre-loads Reservoir System in Remainder of Erf 19909, Worcester.

2.1. GNEC agrees with this statement.

2.2. GNEC agrees with this statement.

2.3. GNEC agrees with this statement.

2.4. GNEC agrees with this statement.

2.5. GNEC agrees with this statement.

2.6. GNEC agrees with this statement.

3.

3.1. Noted and acknowledged.

3.2. Noted. The EMPr has been updated to include all mitigations measures as set out in the Botanical Impact Assessment Report. Please refer to page 47 in die EMPr. Furthermore, a rehabilitation report has been compiled by Mr. Christoff Dippenaar from GNEC. The rehabilitation report has also been included in the EMPr.

3.3. Comment from the Breede- Gouritz Catchment Management Agency ("BGCMA") has been obtained and included within this Comments and Response Report as well as in the BAR. It is GNEC's opinion that an application in terms of the National Water Act, 1998 (Act No. 36 of 1998) will not be required as there are no watercourses located on the subject property. The proposed development will not impact upon the artificial wetland located within close proximity. The proposed development will, furthermore, not make use of any water during the operational phase. Mention should be made that the artificial wetland will be indicated as a no-go area during the construction period. This has been added as a mitigation measure in the EMPr.



3.4. Comments from CapeNature and the BGCMA have been obtained during the Public Participation Process and has been included in this comments and response report.

All comments that have been received will be included in the Second Public Participation Process.

3.5. Noted. Proof of all Public Participation Process's undertaken in terms of Regulation 41 of the EIA Regulations 2014 will be included in the Final BAR.

3.6. Noted and acknowledge.

3.7. Noted. All original signed and dated applicant declarations submitted with the final BAR.

3.8. Noted and acknowledge.

4. Noted and acknowledge.

5. Noted and acknowledge.

«Name»	«Date_of_Comms»	«Means_of_Comms»
Lyle Martin (Department of Transport and Public Works)	5 March 2020	Email
Comment Received		
<p>Good Day</p> <ol style="list-style-type: none"> Receipt is herewith acknowledged of your letter/email 20621 dated 24 February 2020. Kindly note that the matter is receiving attention and that a further communication will be addressed to you as soon as circumstances permit. 		
Response		
<p>Dear Lyle.</p> <p>Thank you for the provided comments on the proposed expansion of the existing Pre-loads Reservoir System in Remainder of Erf 19909, Worcester. The comments provided by the Department of Transport and Public Works have been noted.</p>		

«Name»	«Date_of_Comms»	«Means_of_Comms»
Nicole Abrahams (SANRAL)	10 March 2020	Email



Comment Received

Dear Heloise Groenwald

The above listed project bears reference.

The South African National Roads Agency SOC Limited (SANRAL) has received background information and a site layout plan for this proposed project and based on its location and proximity to the nearest national road could have an impact on SANRAL and would therefore like to register as IAP.

If services need to be constructed over or under the national road, (in this case the N1) or within 60m measured from the road reserve fence, the service owner must apply for a written permission from SANRAL, before any work may be carried out. It would therefore trigger a SANRAL statutory process.

Do not hesitate to contact the sender should you have any further queries.

I trust that you will find the above in order.

Regards

Response

Dear Nicole.

Thank you for the provided comments on the proposed expansion of the existing Pre-loads Reservoir System in Remainder of Erf 19909, Worcester.

The proposed development will not result in any services being constructed over or under the N1 or within 60m from the road reserve fence. The proposed development will therefore not trigger a SANRAL statutory process.