

# **Comments and Response Report** *Version 1*

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Proposed Development of Thabazimbi Extension 75  
Residential Township on Portion 129 of farm  
Doornhoek 318-KQ, Thabazimbi Local Municipality,  
Waterberg District, Limpopo Province

**LEDET Ref. no. Pending**

Prepared by:



Naledzi Environmental Consultants (Pty) Ltd  
Independent Environmental Assessment Practitioner

**Report date: 29 August 2022**

**Appendix E6 – Comments and Report Report for the Proposed Development of a Residential Township to be known as Thabazimbi Extension 75, Portion 129 of the farm Doornhoek 318-KQ, Thabazimbi Local Municipality, Waterberg District, Limpopo Province (LEDET Ref no. Pending)**

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**Report prepared for:**

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## 1. INTRODUCTION

This Comments and Response Report (CRR) presents comments from Interested and Affected Parties (I&APs), stakeholders and organs of state received during the following public engagements:

- Pre-application engagement with LEDET via email during July 2022.
- Public registration period on the Background Information Document (BID) from 15 July to 15 August 2022.

The CRR provides a summary of the issues received and offers a response to the issues raised. As indicated, the public is consulted in two stages during the Basic Assessment process and thus the CRR consists of versions. These versions include:

- **Version 1 – CRR appended to the draft Basic Assessment Report available for public review containing comment on the BID document distributed during the public registration period.**
- Version 2 - CRR appended to the final Basic Assessment Report submitted to LEDET for approval.

This document CRR Version 1 is appended to the draft Basic Assessment Report made available for public review and comment for a period of 30 calendar days from 14 September to 14 October 2022. The CRR Version 1 is available to I&APs on the Naledzi website at [www.naledzi.co.za/publicdocuments](http://www.naledzi.co.za/publicdocuments). It is also submitted to the LEDET for initial comment along with the project application for environmental authorisation.

## 2. ISSUES AND RESPONSE REPORT

Please refer to page 5 for the summary of issues raised by I&APs, stakeholders and organs of state during the public registration period on the project and responses provided thereto.

Refer to page 15 for *Annexure A* containing the *copies of the written comments received* and page 16 for *Annexure B for the responses offered by Naledzi during the public registration period*.

### Table of Contents

1. INTRODUCTION.....	3
2. ISSUES AND RESPONSE REPORT.....	3
1. Comment from LEDET pre-application engagement .....	5
2. Comment from abutting residential development, Zeldri Park .....	6
3. Comment from Stakeholders .....	12

### Attachments:

Annexure A: Copies of comments submitted / discussion trail between I&APs and NEC

Annexure B: NEC responses to I&APs

## LIST OF ACRONYMS

<b>I&amp;AP</b>	Interested and Affected Party
<b>BID</b>	Background Information Document
<b>CRR</b>	Comments and Response Report
<b>PPP</b>	Public Participation Process
<b>LEDET</b>	Limpopo Department of Economic Development, Environment & Tourism
<b>TLM</b>	Thabazimbi Local Municipality
<b>WDM</b>	Waterberg District Municipality
<b>DFFE</b>	Department of Forestry and Fisheries and Environment
<b>SACAA</b>	South African Civil Aviation Authority
<b>DWS</b>	Department of Water and Sanitation
<b>SAHRA</b>	South African Heritage Resources Agency
<b>NEC</b>	Naledzi Environmental Consultants Pty Ltd
<b>EIA</b>	Environmental Impact Assessment
<b>BA</b>	Basic Assessment
<b>dBA</b>	Decibels
<b>WWTW</b>	Waste Water Treatment Works
<b>NEMA</b>	National Environmental Management Act, 1998 (Act 107 of 1998)
<b>NFA</b>	National Forest Act, 1998 (Act 84 of 1998)
<b>WBP</b>	Waterberg Bioregional Plan
<b>LN</b>	Listing Notice
<b>NEMBA</b>	National Environmental Management Biodiversity Act 10 of 2004
<b>C-PLAN</b>	Limpopo Conservation Plan

**Table 1: Comments and Responses recorded from written submissions during the BID public review period**

Number	Date of comment, comment name of organisation/I&AP	Comment	Response from EAP/Specialist/Applicant
<b>1. Comment from LEDET pre-application engagement</b>			
1.1	Email LEDET: Environmental Impact Management (Melinda Rodgers)	<p>The WBP (see Limpopo Provincial Gazette No 2966 of 04 January 2019 promulgated in terms of NEM: BA) replaced the C-Plan (2013) in the Waterberg District. Activity 12 of LN 3 is applicable where a Bioregional Plan is in place and where the site is within a Critical Biodiversity Area in terms thereof.</p> <p>Please note that if you include Activity 4 e. Limpopo i. (ee) of LN 3 because the site is Outside urban area, it is likely that activity 28 of LN 1 would also be applicable for developments between 1 and 5 hectares. For a Township establishment/development, the internal streets are normally covered in the clearance of vegetation.</p> <p>In cases where the EAP is of the opinion that a specialist study required according to the Screening Tool would be superfluous, kindly provide motivation on with the Basic Assessment. I only in the position to recommend for a decision but may not commit thereto at this stage in order not to set a precedent.</p>	<p>We have reviewed the 2019 WBP and the site is located in an Ecological Support Area 1 as per the National Screening Tool Report, therefore Activity 12 (LN3) would not apply.</p> <p>Based on the Thabazimbi SDF the project is situated within the urban edge of Thabazimbi (definition of urban areas) consequently neither activity 4 (LN3) or activity 28(ii)(LN1) would apply and the threshold of activity 28 (i) is also not met. The project would only then trigger activity 27 (LN1, GNR 327).</p>
1.2	Email LEDET – Scientific Manager (Ecological Services) (Johan Kruger) 1 July 2022	I have no concerns with your approach proposed for the specialist studies/surveys.	Noted. It was explained to the LEDET that the project specialist studies would be conducted in July 2022 (winter season) since the tree species and grass are still identifiable and the soil would be the main indicator for the presence of a wetland.

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			<p>Vegetation is only used as a confirmation indicator. The site has been disturbed in the past and the surrounding area is already transformed by residential developments. The site is also fenced in and isolated.</p> <p>02/09/2022 additional note from NEC: Given the low biodiversity and ecological sensitivity of the project site a Terrestrial Biodiversity Statement was completed and is attached to the Draft Basic Assessment Report. The specialist, The Biodiversity Company, confirmed that no wetland is present onsite therefore no wetland delineation was carried out.</p>
<b>2. Comment from abutting residential development, Zeldri Park</b>			
2.1	<p>Completed Comment and Registration Form Zeldri Park Chairperson of HOA (Neil Serfontein) 19 July 2022</p>	<p>The access road needs to be rebuilt before the commencement of construction of the township.</p> <p>Thabazimbi already has a shortage of water supply. Extension 75 will take water out of the system before it reaches Zeldri Park.</p> <p>Zeldri Park had to replace two sewage pumps at its cost since TLM does not have money to repair /replace sewage pumps. Zeldri Park pumps sewage past Extension 75 to join the main sewer of TLM.</p>	<p>Kindly note the poor condition of the Medivet Road is acknowledged in the project Engineering Services Report (Leo Consulting Pty Ltd, 2021) and recommends the road upgrade. The main intersection with the Thabazimbi/Marakele road still operates at an acceptable level of service (LOS) and does not require improvement measures (Traffic Impact Statement, Leo</p>

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		<p>How is Extension 75 going to reach the main sewer line?</p> <p>Endangered trees are not allowed to be removed.</p> <p>Noise and dust during and after construction will negatively impact the lives of Zeldri Park residents, who are currently enjoying the peace of the surrounding area.</p>	<p>Consulting 2022).</p> <p>The TLM is responsible to carry out the required road upgrade and is scheduled for the next one (1) to two (2) years and will be funded by PPC Dwaalboom. The funding is being gathered over the next two financial years, expected to be available by 2024. The construction of the proposed township is planned for 2023-2024 which may possibly coincide with the road upgrade.</p> <p>Naledzi will include any recommendations solicited from the TLM for the proposed township concerning the road upgrade. The public and commenting authorities (incl. TLM) will have the opportunity to review the Draft BAR released for review and comment in September 2022. All the referenced documents i.e. Engineering Services Report and Traffic Impact Statement will form part of the BAR.</p> <p>We are however of the view that the applicant, alone, cannot be held to task to press the TLM to implement this road</p>

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			<p>upgrade since the road deterioration is owed to the cumulative impact from existing residential developments (i.e. Zeldri Park, Akasia and small holdings) and the new township will only add to the mix.</p> <p>This is also addressed in the Draft BAR refer to Section A, Subsection 5; Section C, Subsection 7 as well as Section D, Subsection 1 and 2 as well as Section E.</p> <p>According to the project Engineering Services Report (Leo Consulting Pty Ltd, 2021) the township will be supplied from the Thabazimbi Reservoir from an existing 160mm uPVC pipe along the Medivet Road. Thabazimbi reservoir is located at an elevation of 1094 m.a.s.l and the proposed township at 984 m.a.s.l. resulting in a static pressure head of 110m. Consequently the water reticulation network in the area is over pressurised and there is Pressure Reducing Valve (PVR) located at the Medivet road intersection to address this. By increasing the pressure at the PRV there would be enough water pressure to supply</p>



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			<p>both existing and the new residential development. The PRV adjustment will need to be executed by TLM.</p> <p>According to the project Engineering Services Report (Leo Consulting Pty Ltd, 2021), the total township sewer effluent will drain towards the South-eastern portion of the development via the new internal sewer system (i.e. 160mm uPVC pipes) to the existing rising main sewer line running parallel to the Medivet Road. The sewage will be pumped to connect to the existing Gravity system. A pump station (i.e. submersible pump system) will be constructed to operate in parallel with the existing pump station not to exceed the capacity of the rising mains. The applicant will install the required sewer pump station and will be written off against the contribution of the service.</p> <p>Kindly note that only one protected tree species (i.e. Camelthorn) was found within the project site. The species is protected by the Protected Species List issued under section 12 of the National Forest Act 84 of</p>

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			<p>1998 (NFA). The species status is of 'Least Concern' since it is widespread, yet protected. In terms of the NFA, no person may cut, disturb, damage or destroy any protected tree or possess, collect, remove, transport, export, purchase, sell, donate, or in any other manner acquire or dispose of any protected tree or any product derived from a protected tree, except under a licence or exemption granted by the Minister to an applicant and subject to such period and conditions as may be stipulated.</p> <p>The applicant (<i>Bertie Joubert Eiendomme Lephalale CC</i>) will conserve as many as possible Camel Thorn trees within the township layout. In the event where removal of individual trees cannot be avoided removal permits will be obtained in terms of section 15 (1) of the NFA from the Department of Forestry, Fisheries and Environment (DFFE) (the Minister) before construction of the township.</p>

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			<p>These impacts will be discussed, assessed, ranked and significance rated in the Draft BAR generated for the project. Noise and dust abatement measures will be recommended in the project Environmental Management Programme (EMPR). The reports will be available for public review and comment in September 2022.</p> <p>Based on our initial site verification these nuisance impacts (i.e. noise and dust) will be short-term (12-24 months i.e. not permanent) and of high significance during the construction phase due to the proximity of the sensitive receptors (i.e. existing residential developments), however by implementing dust and noise abatement the impacts can be controlled and the significance lowered. Additionally, we also anticipate the construction to take place Monday to Friday during working hours (7:00 – 17:00) when most</p>

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			residents are at work. The noise during the operational phase will be very low and similar to the existing residential developments in the area.
<b>3. Comment from Stakeholders</b>			
3.1	Eskom Distribution Land Development and Environmental Manager (Budeli Zwanga) 15 July 2022	<p>The application does affect Eskom Distribution's services. The following services are affected: Thabazimbi Combined/SABC Waterberg 11kV Overhead Line.</p> <p>Eskom has no objection to the above mentioned application; the following conditions must be adhered to should you find any Eskom services while busy with your activities.</p> <p>The rights for the 22 KV lines are protected by a Way leave agreement ensuring a safe environment. However, it is required that each affected erf of the township must be registered, subject to Eskom's servitude and at the developer's expense.</p> <p>Eskom's services and equipment must be acknowledged at all times and may not be tempered with or interfered with.</p> <p>No construction work may be executed closer than ten meters from any Eskom Distribution structure or structure-supporting mechanism.</p> <p>Natural ground level must be maintained within Eskom reserve areas</p>	<p>Kindly note the 11kV power line falls just outside the boundary of the proposed township. The development intends to source its electricity demand through two possible Eskom connection points i.e.</p> <ul style="list-style-type: none"> <li>• Existing Eskom TS 11kV line (supplied by the Eskom Thabazimbi Combined Substation) located next to the Thabazimbi-Marakele Road; or</li> <li>• T-off along Medivet Road.</li> </ul> <p>Please refer to Appendix G4 for the Electrical Engineering Service Report attached to the Draft BAR.</p> <p>The applicant will therefore engage Eskom in terms of a way leave agreement and electricity provision request.</p>

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		<p>and servitudes.</p> <p>All work within Eskom reserve areas and servitudes must be carried out in accordance with the requirements of the Occupational Health and Safety Act 85 of 1983 as amended. Special attention must be given to the clearances between Eskom's conductors, structures, cables, electrical apparatus and proposed work as stipulated by Regulations R15 of the Electrical Installations Regulations of the aforementioned Act or any other legal requirements.</p> <p>Eskom shall not be liable for the death or injury of any person, or for loss of or damage to any property, whether as a result of the encroachment or use of the area where Eskom has its services, by the, his/her agent, contractors, employees, successors in title and assignees.</p> <p>The applicant indemnifies Eskom against loss, claims or damages, including claims pertaining to interference with Eskom services, apparatus or otherwise.</p> <p>Eskom shall at all times have unobstructed access to and egress from its services.</p> <p>No dumping shall be allowed within Eskom Distribution Services.</p> <p>Any development which necessitates the relocation of Eskom's</p>	

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		<p>services will be to the account of the developer.</p> <p>Should the applicant or his/her contractor damage any of Eskom's services during execution of any work whatsoever, the incident must be reported to Eskom's 24-hour Contact Centre (086 000 1414) immediately.</p> <p>The above conditions should be accepted in writing before any work within Eskom Services commences.</p>	
3.2	<p>SACAA Obstacle Inspector (Lizelle Stroh) 15 August 2022</p>	<p>SACAA provided several aerial maps showing the location of the site in relation to the project site via email including obstacle surface diagrams (See Annexure A)</p> <p>According to SACAA the airfield is already restricted by developments. Data shows that the ground elevation from the airfield to the application site escalates. The 1: 7 slope to the airfield must be clear.</p>	<p>The development will not pose a hazard to the airstrip. The township is proposed amid (next to and across from) existing residential developments. The building height will not exceed 2-storey height similar to the abutting residential complex. The Thabazimbi Airfield management has also been furnished with the development detail. Comments will be included in the final BAR.</p>

# **ANNEXURE A**

## **COPIES OF COMMENTS RECEIVED FROM I&AP AND STAKEHOLDERS**

# **ANNEXURE B**

## **RESPONSES PROVIDED BY NEC**