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May 2016



Executive Summary

Draft Scoping Report: Seaview Low Income Housing Development, Port Elizabeth

1. Introduction

The Nelson Mandela Bay Municipality (NMBM) proposes to construct a low cost housing development and associated facilities in Seaview (see locality in Figure 2). The development will provide housing for the communities currently living in Zweledinga and New Rest informal settlements in Seaview.

SRK Consulting (SRK) has been appointed by the NMBM, as the independent consultants, to conduct the Environmental Impact Assessment (EIA) in terms of the National Environmental Management Act 107 of 1998 (NEMA), as amended, and the Environmental Impact Assessment (EIA) Regulations, 2010, for the proposed housing development.

In July 2014 an application to commence the current EIA process was submitted to the Department of Economic Affairs, Environmental Affairs and Tourism (DEDEAT).

2. Approach to the Study

The proposed development is subject to environmental authorisation from DEDEAT in terms of the NEMA. As such, an EIA is required and this Draft Scoping Report (DSR) presents an important milestone in the EIA process.

The first step of the EIA process (see Figure 1) is the Scoping Study. The Scoping process is aimed at identifying the issues and/ or impacts that may result from the proposed activities, including the concerns of Interested and Affected Parties (IAPs), in order to inform the Impact Assessment phase of the EIA process. The Final Scoping Report (FSR) will form the basis of the Terms of Reference (ToR) for specialist studies, and it is therefore important that all issues and potential impacts that may be associated with the proposed development be identified and recorded.

The EIA process thus far has focussed on developing a more detailed description of the development proposal, and

on identifying the issues and concerns of stakeholders and IAPs. IAPs are encouraged to review the DSR to ensure that their comments have been accurately recorded and understood.

The following activities have been completed as part of the Scoping Study in accordance with the requirements of the NEMA EIA regulations:

- Advertisement of the development in "The Herald" newspaper on 5 March 2014,
- Distribution of the Background Information Document (BID) from 6 March 2014 to identified IAPs, stakeholders and residents in the area;
- Collation of public and IAP comments on the BID and adverts, including responses to these issues;
- Inclusion in the DSR of issues that were raised (a summary of comments and responses is provided as in Table 2);
- Preparation of a DSR and distribution to public venues for review by IAPs, and submission to authorities; and
- Distribution of an Executive Summary of the DSR (this document) to all IAPs registered for this project.

The following activities are still to be conducted in the Scoping Study:

- Placement of an on-site poster;
- Provision of a 40 day comment period on the DSR;
- Compilation of all comments received on the DSR and integration of these comments into the Final Scoping Report (FSR); and
- Provision of a 14 day comment period on the FSR;
- Submission of the FSR and the Plan of Study for the EIA to DEDEAT for consideration and approval.

Once approved, the EIA process can proceed to the detailed Impact Assessment phase.

An overview of the EIA process being followed, indicating opportunities for public comment, is provided below.

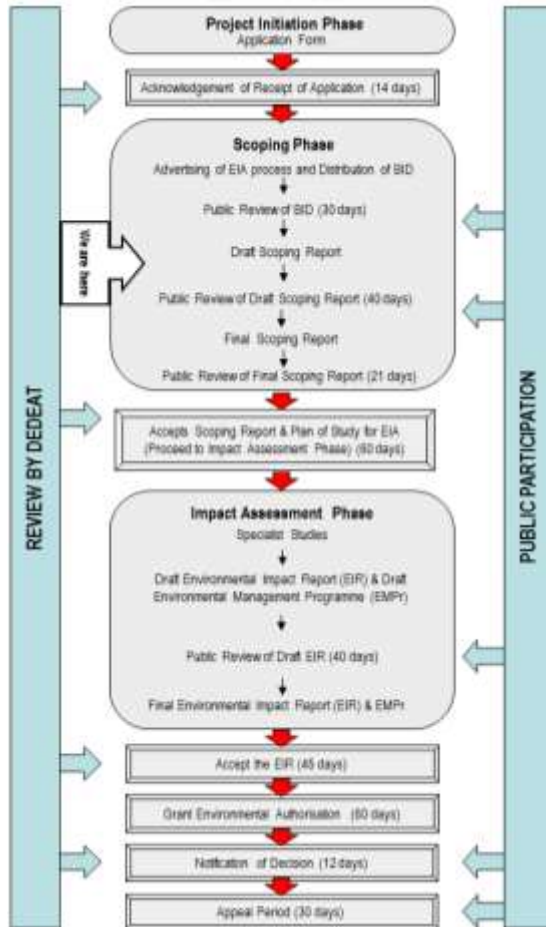


Figure 1: EIA Process

3. Motivation for the Proposed Development

Housing and service delivery is also a key challenge facing the Nelson Mandela Bay Municipality (NMBM). According to the NMBM's Integrated Development Plan (2015/16 – 14th edition, adopted 18 June 2015) the NMBM has a housing backlog of 46,161 units (30,002 backyard shacks, 14,671 units in informal settlements and 1,488 other units) and identified the provision of quality housing and the structured upgrading of informal settlements as one of their main objectives. Their aim is to upgrade and eliminate all informal settlements by 2018, and provide basic sanitation to all communities in the NMBM by 2016. The proposed provision of housing for residents of informal settlements in the Seaview area is also listed as one of the priority projects for Ward 40 in the IDP.

The NMBM has identified five potential sites to provide housing for the informal settlements of Zweledinga and New Rest which are located to the north and north-west of Seaview. The Municipality is focused on the provision of

sustainable integrated human settlements, which means the provision of housing must be accompanied by the provision of other services and amenities required to improve the socio-economic conditions of the residents of that area (i.e. access to community facilities such as educational, entertainment, cultural, health, sports and welfare services). Therefore, the focus of this project is on creating an integrated sustainable settlement which reflects the vision of new initiatives in the NMBM.

4. Development Proposal

The Nelson Mandela Bay Municipality (NMBM) proposes to develop low cost residential units and associated infrastructure in Seaview. The development will provide formal housing for the residents of Zweledinga and New Rest informal settlements located on erven 590 238 and 240. Two development options are provided, option 1 entailing development of approximately 400 units on non-forested patches on these erven as well as portion 10 of farm 28, Seaview, and option 2 involving development of up to approximately 1000 units on portion 1 of farm 28. On-site sanitation is also proposed for both options.

Housing and associated land uses

Beneficiaries will receive a fully state subsidised formal structure (Free basic house/RDP) of 45 m². Beneficiaries will depend entirely on being housed by the state without any expectation of making financial contributions towards the house/services/ transfer/ registration costs for the property to be received. Houses will be typical RDP structures on a minimum erf size of 250 m² to accommodate the sanitation services on each erf. The houses will consist of one shower and sink per dwelling (no bath).

The proposed development will include areas zoned as public open space (both parks and natural/ indigenous vegetation), as well as community zoning to make provision for uses such as a crèche or church. Special Purpose zoning would be a zoning for an integrated use such as a community facility or a waste transfer station etc.

Development Options

As the majority of land falls within the DAFF forestry layer, development is likely to be constrained to the transformed areas. Option 1 therefore proposes the utilisation of the disturbed areas on Erf 590, Erf 238, Erf 240 and portion 10 of Farm 28 for the development of formal housing in order to meet the required number of houses. It is therefore proposed that the development be split between these properties.

The second option under consideration is the purchase of Portion 1 of Farm 28 which contains approximately 75 ha of previously transformed land to the east of the property. The transformed area will be sufficient to contain the entire development, and provide capacity for future expansion to accommodate community growth. A preliminary layout for the proposed development of this site is not yet available but will be based on the footprint area assessed and

proposed for residential development through the EIA previously conducted on the site (CEN, 2012). Based on this EIA, indications are that this portion of the site is suitable for residential development from a biophysical perspective, however there are cost implications as the property is privately owned -.

Sanitation Options

Two alternatives exist for the provision of sanitary services on Portion 1 of Farm 28. Either a package Wastewater Treatment Plant or Low Volume Flush Toilets with leach pits. The latter option is proposed for Option 1.

Low Volume Flush Toilets will be drained to a leach pit located on each property. Special modifications will be made to the leach pit to accommodate additional water from the sink and the shower and will comprise dual pits. Community institutions will be provided with low volume flush toilets connecting, depending on size of institution, to either a small septic tank discharging to a soak pit or to a conventional septic tank discharging to a French drain

The proposed package plant includes a head of works, reactor, clarifier, chlorination, sludge lagoons and a reed bed. An updated review of the sizing requirements and most viable technological option for the package plant, taking the changes to the type and number of housing units proposed for the site (mid-upper income low density units to higher density free basic housing) has not yet been conducted. Further detail on this will be provided in future reports as part of this EIA

5. Potential impacts

The following potential impacts have been identified based on SRK's understanding of the receiving environment, typical impacts associated with developments of this nature, and concerns raised by IAPs:

Impacts on Heritage Resources: Damage or destruction to archaeological resources on the site may occur due to earthworks and excavations during construction.

Terrestrial Ecological Impacts: Indigenous vegetation will need to be cleared for the development, resulting in loss of habitat and possibly species of special concern. This is however largely limited to previously transformed areas, but as layout option 1 entails pockets of development between patches of forest and / or other indigenous vegetation, impacts on connectivity and movement of fauna between patches may result.

Edge effects on the bordering vegetation and habitat resulting from disturbance, littering, alien invasive vegetation, and hunting or bush cutting, are could also potentially result from this development option, both during construction and operation, and may displace and disturb local fauna. Clearing and disturbance of the soil during construction may also promote the growth and spread of invasive alien vegetation on the site.

Preliminary development layouts have accommodated the forested areas so that development is proposed within

existing transformed areas and the destruction of forest is thereby minimised. In instances where destruction of forest or trees has been agreed to by DAFF (in what they deem to be 'exceptional' circumstances) permit applications in this regard will be submitted to the department. Permits for destruction of other protected plant species may also be required from DEDEAT.

Socio-economic Impacts: The proposed project will impact positively on the current housing shortfall experienced in the Nelson Mandela Metropolitan area. Provision of formal housing as well as services will improve the standard of living of the beneficiaries currently living in the informal settlements of Zweledinga and New Rest. Construction of the housing development will also result in short term employment for semi-skilled workers.

Traffic Safety Impacts: As the development proposal for layout option 1 consists of pockets of development along and on both sides of Seaview road, it is anticipated that movement of pedestrians between the various sites may result in traffic safety impacts and that specific management measures will be required to manage this.

As most of the housing beneficiaries will not own cars and will rely on public transport (as per the current situation, as they are already resident in the Seaview area), changes in traffic flow are not expected. In the event that Portion 10 of Farm 28 is developed however, the access road will join up with Aliwal Road, increasing the volume of traffic usually experienced along this road. Pedestrian traffic in these areas could also be expected to increase.

Impacts on Aquatic environments: Due to the undulating nature of the terrain, it is possible that wetlands may be present within and close to the development area. Contaminated runoff or wastewater from construction activities (e.g. cement wastewater, fuel spills etc.) and sedimentation may lead to pollution of any water resources present in site. Stormwater runoff from the housing development that is polluted with litter or other contaminants may lead to pollution of downstream water resources. Levelling of the site and changes to the stormwater regime of the area may also lead to changes to the hydrology of any wetlands.

Impacts on Groundwater: Although soil percolation tests are believed to have confirmed the suitability of such infrastructure, seepage of leachate from the leach pits and septic tanks proposed for sanitation could potentially result in impacts on groundwater quality, which is understood to be an existing concern in the area (due to septic tanks). A specialist assessment is therefore proposed to confirm compliance with DWS's minimum standards in this regard

Stormwater and Erosion Impacts: Vegetation clearing and disturbance of soils during construction will leave them vulnerable to erosion by water and wind. This could lead to increased sediment load in stormwater runoff, potentially clogging the receiving stormwater infrastructure. Loss of topsoil and erosion will also limit the potential for vegetation growth in these areas, leading to further erosion.

Waste management Impacts:

Lack of adequate waste management during construction could result in spread of litter, illegal dumping, contamination of soil and water resources, and increased prevalence of scavengers at the site.

Currently no waste collection service is provided to the residents of Zweledinga and New Rest although an informal waste transfer station is located in Seaview. During operation, waste generated by the residences/businesses and facilities proposed on the site could result in similar impacts as those mentioned above for construction if not adequately managed. Waste entering the stormwater system may also result in blockages and downstream contamination. Waste collection services will need to be provided for residents in order to manage the impacts during operation.

Visual Impacts: Portions of Erf 590, 240 and 238 are currently occupied by informal houses which border the Seaview Road. As the proposed development (option 1) will take place in transformed /previously occupied areas which are visible from the Seaview Road it is anticipated that the construction of formal houses (or in the case of option 2, management of these areas to prevent additional in-migration) will have a positive visual impact. The forested areas that will remain on the site are also expected to provide some degree of visual shielding. The development will however be provided with lighting which may be perceived negatively by residents of Seaview who are situated at a lower elevation than the proposed development sites.

During construction, dust resulting from vegetation clearing and earthworks may also be visible from a distance.

Impacts Related to Construction: Impacts during the construction phase may potentially include the following:

- Sanitation and water supply;
- Nuisance dust impacts;
- Noise impacts;
- Safety and security;
- Chemical pollution of soils and stormwater due to spills or leaks;
- Damage to other infrastructure (e.g. underground cables and pipelines);
- Veld fires and fire management; and
- Interruption to services supply

Fire Safety Risks

As the development will entail the clearing and development of areas currently interspersed with invasive alien trees (which are prone to burning), the risk of veld fires in the area is anticipated to decrease. This is further supported by the fact that the proposed houses will be

electrified and wood or paraffin will therefore not be the main energy source.

6. Draft Plan of Study for EIA

The following specialist studies are proposed in order to investigate the potential environmental impacts associated with the proposed development:

- Updated Forestry Survey (for option 1);
- Archaeological Impact Assessment
- Palaeontological Impact Assessment;
- Ecological Impact Assessment
- Wetland and aquatic environment Impact Assessment; and
- Groundwater Impact Assessment.

It is noted that a number of specialist studies have already been conducted for some of the sites under consideration (notably but limited to Farm 28/1 as part of the previous EIA process for this site). Where appropriate, the findings of these studies will be used, and updated as required.

It is proposed that the following potential impacts will be assessed by the EAP and addressed via standard mitigation measures:

- Construction impacts of a general nature;
- Waste management impacts;
- Traffic safety impacts;
- Impacts relating to fire;
- Visual impacts;
- Stormwater and erosion impacts; and
- Socio-economic impacts.

7. Way Forward

The public participation programme has given IAPs an opportunity to assist with the identification of issues and potential impacts.

The Executive Summary (this report) of the Draft Scoping Report has been distributed to all registered IAP's. A printed copy of the report will be made available at **Walmer Public Library** (Main Road, Walmer, Port Elizabeth). The report can also be accessed as an electronic copy on SRK Consulting's webpage via the 'Public Documents' link: <http://www.srk.co.za/en/page/za-public-documents>

Written comment on this Draft EIR should be sent by **17h00 on 7 July 2016** to:

SRK Consulting

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Email: wmarais@srk.co.za

Fax: (041) 509 4850

The Draft Scoping Report (this report) has been submitted to DEDEAT and the other relevant authorities, for comment before compilation of the Final Scoping Report.

Once IAPs have commented on the information presented in the DSR, FSR will be produced and submitted to DEDEAT to use in order to take a decision about the proposed development. The public is therefore urged to submit comments

Table 1: Estimated target dates for key activities in the EIA process

Stage / Activity	Target Dates	
	Start	End
Submission of Final Scoping Report and Plan of Study for EIA to DEDEAT	7 July 2016	21 July 2016
DEDEAT approval of Plan of Study for EIA (potentially including recommendations)	4 August 2016	5 September 2016
Conduct Specialist Studies and Compile Draft EIR	30 June 2016	19 September 2016
Public Comment Period for Draft EIR	19 September 2016	31 October 2016
Prepare Final EIR	31 October 2016	14 November 2016
Public Comment Period for Final EIR	14 November 2016	28 November 2016
Submit Final EIR to DEDEAT for a decision	28 November 2016	

Table 2: Comments and Responses Table on BID

Commentator & comment no.	Issues raised	Response (SRK unless otherwise specified)
Comments relating to the process		
HS Du Plessis	SRK must comply with erecting notice boards 100m from affected residents and adverts in The Herald or Die Burger.	Newspaper advertisements have been placed – refer to Section 4.2 of the DSR for details. On-site posters will be placed during the scoping process, indicating the availability of the draft report.
M Njovu, M Smit, N Steven, N Grobler, N Daweti, M Thobeka, N Goeda, T Jerry, N Futuse, B Lizo, J Manisa, S Mengo	Lack of consultation with residents of informal settlements.	While communication regarding the specifics of the proposed development has not been held with the recipient communities as part of the EIA process. It is SRK's understanding that the NMBM has engaged with the beneficiaries regarding the proposed project over the last few years and that in-principle support has been confirmed. It is also noted that the project is in response to pressure from these communities for formal housing and services. Further community consultation will be undertaken during the public review period.
Comments relating to design		
G & V Rengecas ; JP van Speyk ; HS du Plessis; A Carstens; ECJ Webb & J Ellis	Considering the number of residents in New Rest and Zwelidinga areas, the need for 600 units is overestimated.	The original proposal was for approximately 600 units to allow for future growth of these communities. Due to space limitations however, this number has been reduced to approximately 400 units for Development Option 1. Development Option 2 will allow for additional units to accommodate future growth.

G & V Rengecas; R Hirstle; A Topliss; GS Davis	Design will allow for informal settlements to be developed. How will future additions of shacks to these houses be monitored?	NMBM - the design will not allow for informal settlements to be developed but rather the development of low income residential areas to accommodate beneficiaries from the informal settlements. The addition of structures without an approved building plan is illegal, however the NMBM recognises that controlling this in communities such as these can be problematic. It is recognized that the clearing of vegetation and installation of basic services infrastructure in the area may attract additional dwellings that are not part of the formal relocation process. The NMBM proposes to manage the risk through site inspections to monitor and address any illegal dwellings, as well as establishing a team of community representatives as whistle blowers in this regard.
R Hirstle	Will there be a green boundary between existing residences and the proposed development?	The proposed layout options, as depicted in Appendix Gin the DSR, are all designed to ensure existing forest is not impacted on.
JP van Speyk	A permanent solution of one proper and serviced development to accommodate all must be found.	Within the environmental constraints of each of the sites, this is what is proposed. Development Option 2 allows for a consolidated development to accommodate all recipients.
JP van Speyk; HS du Plessis	Solar lights and geysers and container ablutions would be eco-friendly	The design allows for on-site ablutions for each property. Detail regarding use of solar energy has not yet been confirmed.
JD Gibb	Sandy soil is mostly undulating and soft which makes it expensive to build on.	Slope has been taken into account in the preliminary layout, and excessively steep areas have been avoided.
A Topliss	A buffer zone of non-residential buildings should be put into the plans e.g. school, church, playground etc	Special Purposes areas for land-uses such as these are included in the preliminary layout (see Appendix G in DSR)
A Topliss	Erf 240 is not large enough.	The development proposal for option 1 is to include transformed areas on erf 238, 240, 590 and 28/10, to meet the housing requirement.
A Topliss	According to The Herald (10/03/14) the RDP houses will be off the grid. What will be used for cooking and heating?	That article was based on a previous development proposal. The current proposal is for the houses to be connected to the NMBM electricity grid.
A Topliss	What will happen to the existing shacks?	The existing shacks will demolished and the material recycled or disposed of.
ECJ Webb & J Ellis	The three properties, owned by the NMBM and shown on the locality map, can be utilised without acquiring additional ground.	Due to the presence of protected forest on these sites, the developable area is largely limited to previously transformed areas. Erf 590 and 28/10 do not provide sufficient developable space given the requirements of the proposed layout, which includes larger erven to allow for on-site sanitation. Consequently Development Option 1 includes development of transformed areas on erf 238, 240, 590 and 28/10.
G & V Rengecas; A Topliss	The combination of Erf 10/28 and Erf 590 should provide sufficient land to accommodate the residents.	
C L Neilson	Erf 590 should be selected as it already has residents residing there.	
M Njovu, M Smit, N Steven, N Grobler, N Daweti, M Thobeka, N Goeda, T Jerry, N Futuse, B Lizo, J Manisa, S Mengo	Residents of informal settlements do not want to be relocated.	Agreed. The need for providing formal housing in the Seaview area is so that residents in the existing informal settlements are not relocated.

Comments relating to the environment		
G & V Rengecas; ECJ Webb & J Ellis	General concern of impact of development on environment.	Biophysical impacts on the environment will be assessed in the impact assessment phase – see proposed Plan of Study for EIA in Section 6 of the DSR
G & V Rengecas; H Ferreira; R Spalding	The area protected 'green belt' / commonage and may not be developed.	The development proposal is primarily limited to already transformed areas and will avoid forest and CBAs – refer to Figure 3-5 & Figure 3-6 in the DSR.
S Keown; B de Jager; B de Jager; JD Gibb; TH Johannes; D Nortje; N Quvile	Area is protected coastal forest / bush / thicket and conservation area.	
JW Kotze; GB Smit	Within the 1km coastal zone – refer to NMBM's Coastal Management Programme.	The proposed development is outside the coastal setback line (see Figure 3-5 in the DSR)
GB Smit	Development will impact coastal dune system.	
N Littleton	Concern regarding integrity of Baviaans Island Reserve.	Ecological impacts will be assessed in the EIA, however it is noted that the development is to cater for residents already living in informal settlements in the area, and as such is likely to indirectly reduce impacts on protected areas.
G & V Rengecas; JP van Speyk; H Terblanche; A Topliss; K & W Lyons; N Littleton; C Fehrsen; H Ferreira; R Spalding; W Leonard	There are indigenous trees and plants such as coastal fynbos and Milkwoods on the proposed land. How will the indigenous flora be protected?	The proposed layout is largely restricted to transformed areas (see Figure 3-6 in the DSR). Where required, the necessary permits will be obtained for destruction of protected flora.
G & V Rengecas; H Terblanche; A Topliss; K & W Lyons; H Ferreira; R Spalding; W Leonard	There are many animals and birds in the area which will be displaced by the development. How will the indigenous fauna be protected?	Ecological impacts will be assessed in the EIA and measures to mitigate impacts will be proposed. The ToR for the ecological study are provided in Section 6.3.4 in the DSR.
A Carstens	Seaview houses a sensitive butterfly colony similar to those in the Alexandria forests.	
C Bosch	Wildlife will be hunted as food source.	
N Quvile	DAFF's position remains that natural forests may not be destroyed save in exceptional circumstances. Residential housing does not qualify as an exceptional circumstance. Suitable alternative land must be sourced.	Noted. The current development proposal is limited to previously transformed areas, which do not contain forest.

N Quvile	The area between the airport and Maitland River is among the five largest forest complexes in the country and is threatened by increasing fragmentation. Natural forest is the rarest terrestrial biome and must receive strict protection.	
N Quvile	Any approval would be in contradiction with Section 3 of the National Forests Act. DAFF is acting on various approvals of such developments granted after April 1999.	
N Quvile	A botanist experienced in identifying natural forest must be appointed to map forest pockets on the proposed site.	Noted. Forest mapping will be included in the EIA to ground-truth the aerial imagery – see ToR in Section Section 6.3.1 of the DSR.
Comments relating to social impacts		
A Topliss; C Bosch	Presence of informal residents has led to increase in illegal drug and alcohol sales and prostitution.	The development proposal is to formalise these settlements. As such, we do not expect this to materially affect the occurrence of social ills such as (but not limited to) selling of drugs or prostitution.
Comments relating to the economy		
R Spalding	Will the residents of the development pay rates and taxes?	The residents will be subject to the NMBM's standard policy for rates and taxes.
G & V Rengecas; JP Swart; DM Davis; A Topliss; DS Visser; K & W Lyons; N Littleton; D Tunley; EK Pienaar; E Gerber; C Fehrsen; R Spalding; L Denny; A Carstens; C Bosch	Development will lead to depreciation of property values in area. House rentals will be affected. Resale will be problematic. Reduced rates and taxes for NMBM.	The development proposal is to accommodate residents already living in informal settlements in the area. Increased negative socio-economic impacts on surrounding areas relative to the current situation are therefore considered to be unlikely.
G & V Rengecas; DM Davis; B de Jager; B de Jager; E & J Howard; A Brown; K & W Lyons; E Haze; N Littleton; KP Cloete; D Nortje; A Carstens; GS Davis; W Leonard; ECJ Webb & J Ellis; C Bosch	Lack of employment opportunities in the area.	

R Spalding	Development will deter investment in area.	
G & V Rengecas	What impact will the development have on the upscale hotel proposed to replace the old Seaview Hotel?	
JP Swart; N Littleton;	Home security will need to be upgraded at cost of owner.	
JP Swart; C L Neilson; B de Jager; B de Jager; JD Gibb; D Nortje	Development will affect tourism. December rental will be lost.	
G & V Rengecas; H Terblanche; JP Swart; DS Visser; K & W Lyons; D Tunley; C Fehrsen; EM Bosman; GS Davis; W Leonard; ECJ Webb & J Ellis; C Bosch	Danger of escalation of crime. No police station.	
Comments relating to safety concerns		
JP van Speyk HS du Plessis; DM Davis	Danger of high fire risk. Refuse dumped and set alight without tending to fire.	The provision of formal houses to existing residents is likely to reduce the risk of fires typically associated with informal housing. The development will include electrical connections which would reduce the use of fire for cooking and heating. Waste management for the develop will be subject to the NMBM;s waste collection policy.
JP van Speyk	No pavements, verges or streetlights along tar road to Seaview. Pedestrians must walk on the road facing traffic.	Safety impacts will be assessed as part of the EIA and mitigation measures proposed to manage these impacts.
JP van Speyk	Pedestrian and road traffic from Greenbushes to and from Seaview Spar Complex can be heavy and dangerous.	
EK Pienaar; D Nortje; L Denny; EM Bosman	Service delivery protest and riots will affect all residents. Risk of damage to property, roads and burning of tyres.	As the proposal is to provide housing and services to these residents, it is anticipated that service delivery protests will cease.
Comments relating to health concerns		
H Terblanche	Health risk – livestock	It is unclear what this concern relates to
HS du Plessis	Residents should in the interim be provided with bucket system and refuse containers until housing can be provided.	Noted.

N Littleton; KP Cloete	Use of septic tanks for large population with poor herd immunity in confined area on sloped sand dune will lead to frequent outbreaks of communicable diseases. Soak-aways can cause contaminated water flowing to lower areas.	The sanitation solutions proposed are discussed in Section 2.2.2 of the DSR, and potential impacts on groundwater will be assessed as part of the EIA (see ToR in Section 6.3.6 of the DSR).
Comments relating to pollution		
C Fehrsen; C Bosch	Stray animals will tear refuse bags and spread communicable diseases.	The development proposal will be subject to waste management as per the NMBM's integrated waste management plan. Waste management impacts will be assessed as part of the EIA.
G & V Rengecas; H Terblanche HS du Plessis; A Topliss; EK Pienaar	Lack of pride in the environment, illegal dumping and littering will be prevalent. No refuse collection point or refuse bins in area.	
H Terblanche A Topliss; Pienaar	Burning of refuse and rubble leads to air pollution being spread due to prevailing winds.	
JP Swart	General pollution concerns	
G & V Rengecas; JP Swart; A Topliss; EK Pienaar; E Gerber; C Fehrsen	Danger of increased noise pollution.	Noise impacts relating to construction will be assessed as part of the EIA. During operation, increased noise relative to the current situation is considered to be unlikely.
C Fehrsen	Smoke from fires for household cooking and cleaning will hover over Seaview Village.	The development will include electrical connection, therefore the use of fire for cooking and lighting will be reduced.
Comments relating to infrastructure		
G & V Rengecas; E & J Howard; K & W Lyons; E Haze	Lack of sufficient schools in the area.	The proposed layout includes provision for community facilities as per the relevant planning requirements
K & W Lyons	Lack of medical facilities in area.	
E & J Howard	Lack of recreational amenities in area.	
E & J Howard; K & W Lyons; N Littleton; R Spalding	Road system unable to support additional traffic.	It is anticipated that the recipient's current arrangements with regard to transport will remain, and additional traffic is therefore not expected. The on-site sanitation proposed will only require occasional emptying.
G & V Rengecas; A Brown; K & W Lyons; E Haze; N Littleton; KP Cloete; A Carstens; ECJ Webb & J Ellis	Lack of public transport in the area. How will people commute to work and school?	
KP Cloete	Damage to roads by addition traffic and tanker trucks used to empty septic tanks.	
JW Kotze	Lack of funds for maintenance of provincial and municipal roads.	

G & V Rengecas; R Hirstle; JP van Speyk DM Davis; E & J Howard; K & W Lyons; E Haze; N Littleton; KP Cloete; GS Davis; W Leonard	Is the existing infrastructure adequate to support the proposed development? Will existing infrastructure be upgraded to accommodate the increased pressure?	The development will largely connect onto existing services and will make use of on-site sanitation. Water supply will be via a proposed scheme for the greater area.
G & V Rengecas; R Hirstle; JP van Speyk DM Davis; E & J Howard; JW Kotze; GB Smit; K & W Lyons; E Haze; N Littleton; H Ferreira; GS Davis; W Leonard	No sewerage system / waste management infrastructure in area. Existing properties use septic tanks with French drains.	On-site sanitation is proposed as described in Section 2.2.2 of the DSR.
H Terblanche	Higher elevation of Erf 238 in comparison to existing property below – sewerage.	
H Ferreira	Where will NMBM be getting the funds for the provision of necessary services?	As the project as listed as a priority action in the NMBM IDP (2015), it is assumed the funds will be allocated from the budget for housing provision and service delivery.
Comments relating to visual impact		
B de Jager; B de Jager; D Nortje	Can those who receive these houses maintain them in keeping with the aesthetics of the area?	This is a universal issue with subsidised housing and is outside the scope of this project to assess. It is noted though that the proposed development may be an aesthetic improvement on the current informal settlement.
Comments relating to suggested alternatives		
JP van Speyk; HS du Plessis	The combination of Erf 240 and 28/31 should be selected as it already has a police station, school site zoning, two entrances and is close to shopping amenities.	The sites included in this application were chosen based on a number of factors including ownership (government owned or willingness of the landowner to sell), location relative to the existing informal housing, and available transformed areas for development. Assessment of additional alternatives does not form part of this application.
TH Johannes	Erf 1/20 has already been disturbed and should be selected for the housing development.	
K & W Lyons	Alternate land is available where alien vegetation occurs.	
N Littleton; KP Cloete; R Spalding; W Leonard	Housing development should be built in Greenbushes.	
R Spalding	Housing development should be built in Missionvale.	Many of the recipients are employed in the Seaview area and relocating them elsewhere would result in a significant increase in their commuting time and expenses.

N Quvile	DAFF requests the outcome of the investigation of alternative land portions such as Portions 1 and 10 of Farm 28.	These portions are included in the application and their suitability will be assessed via the EIA.
Comments of a general nature		
DM Davis	Two previous EIAs were refused and were for high income housing. What has changed?	We are not able to comment on unspecified EIA's.
G & V Rengecas	The residents of New Rest and Zwelidinga are claiming squatters' rights and have no land claim which needs to be accommodated.	The housing recipients will be subject to the NMBM's policy and procedures in this regard.
G & V Rengecas; R Spalding	More people are moving into New Rest and Zwelidinga since the development became known. What controls are in place to guard against influx of unemployed people hoping to get housing?	Houses are allocated to beneficiaries according to the NMBM's housing policy. It is generally agreed that the provision of housing is a relatively insignificant contributing factor, whereas job opportunities are a more significant driver, for the influx of people to an area. .
KP Cloete	The development is not suitable for an upmarket coastal village.	The development is in line with government policy in support of integrated residential development, as well as the principle of housing people close to their places of work.

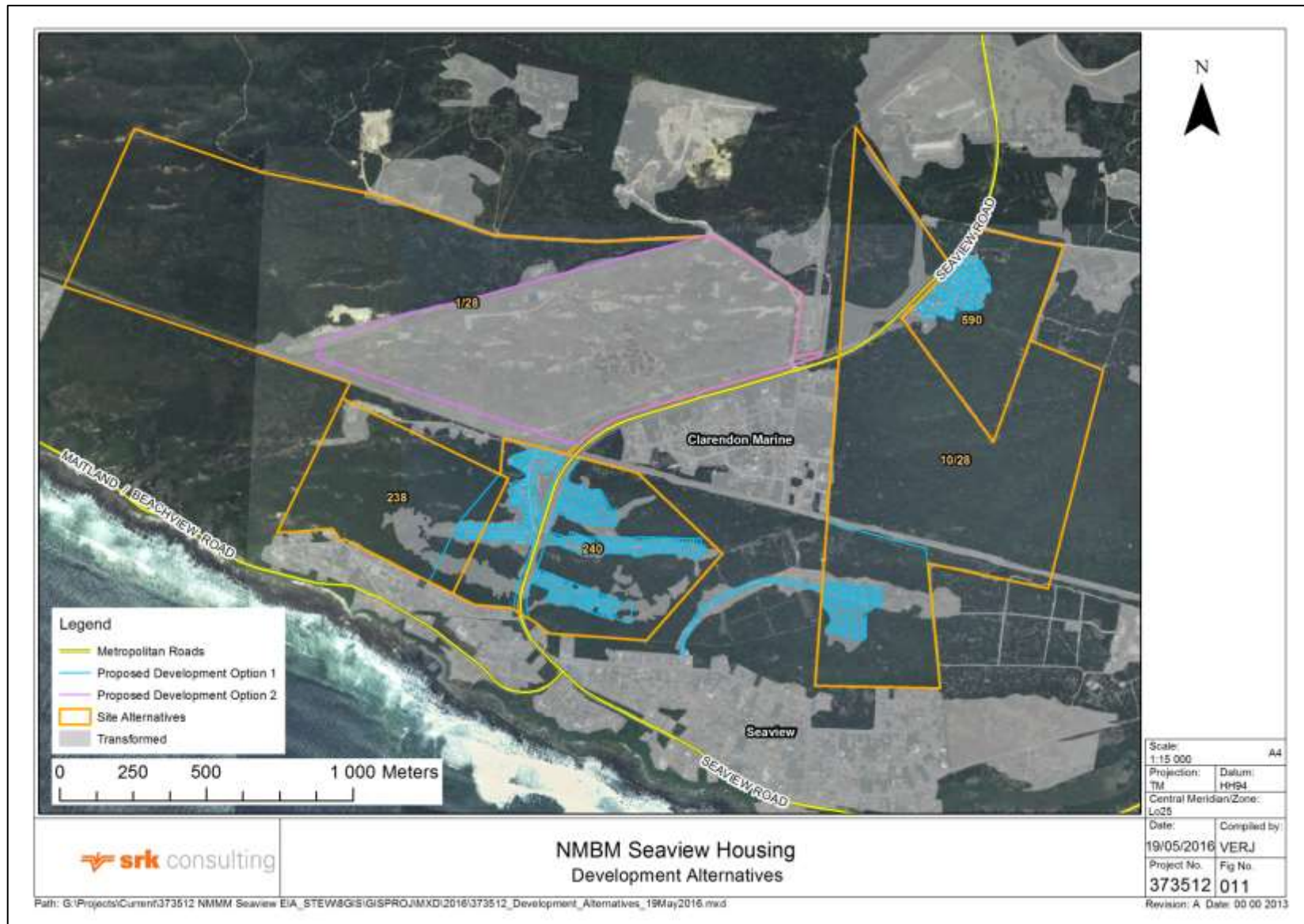


Figure 2: Site locality map indicating the two proposed development options