SCOPING AND ENVIRONMENTAL IMPACT REPORTING PROCESS FOR THE ESTABLISHMENT OF THE PROPOSED DEVELOPMENT OF A HIGH SPEED PROVING GROUND (HSPG) FOR VEHICLE TESTING FOR MERCEDES-BENZ SOUTH AFRICA, NORTHERN CAPE

COMMENT AND RESPONSES REPORT

SUMMARY OF ENVIRONMENTAL ISSUES/CONCERNS AND SUGGESTIONS RAISED BY REGISTERED STAKEHOLDERS

FEBRUARY 2016

- This Comments and Responses Report (CRR) is a record of all the contributed issues raised by Stakeholders ranging across all sectors of society;
- A full record of every issue raised is available from WSP Environmental (Pty) Ltd and is also included in **Appendix 5-3** of the Draft Environmental Impact Assessment Report (EIAR);
- Many stakeholders raised the same issue and these have been arranged into groups of similar issues; and
- The name, affiliation (as at that time) and date of the commentator are also indicated.



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ABBF	REVIATIONS USED IN THIS C&RR:		
CV	Curriculum Vitae		
EAP	Environmental Assessment Practitioner		
BID	Background Information Document		
DWA	Department of Water Affairs		
EMPF	R Environmental Management Programme Report		

Environmental and Social Impact Assessment



Draft Scoping Report

Final Scoping Report

Environmental Impact Assessment

Material Safety Data Sheets

South African Heritage Resources Agency

ESIA

DSR

FSR

EΙΑ

SAHRA

MSDS

Issues/Comment	Raised By	Response
1. General Issues		
Please will you send the Scoping Report as it has not yet been received?	Name: Ordain Riba Organisation: Northern Cape Department of Environment and Nature Conservation Date: 14 October 2015 Form of Correspondence: Authority Meeting	The Final Scoping Report was approved on 12 January 2016, refer to Appendix 5-8 of the EIAR.
What is the surrounding land uses?	Name: Ordain Riba Organisation: Northern Cape Department of Environment and Nature Conservation Date: 14 October 2015 Form of Correspondence: Authority Meeting	Currently it is mostly agricultural (Cattle farming).
Does Mercedes-Benz South Africa (MBSA) have any other sites where the cars are currently being tested in the Northern Cape?	Name: Ordain Riba Organisation: Northern Cape Department of Environment and Nature Conservation Date: 14 October 2015 Form of Correspondence: Authority Meeting	No currently there is no MBSA testing facilities being utilised in the Northern Cape region.
2. Public Participation Comments/Issues		
Please register our company as a stakeholder for the - PROPOSED DEVELOPMENT OF A HIGH SPEED PROVING GROUND FOR VEHICLES TESTING BY MERCEDES BENZ SOUTH AFRICA, UPINGTON, NORTHERN CAPE	Name: Jaco Strauss Organisation: IT5 Siviel (Civil Construction and Mining) Date: 22 July 2015 Form of Correspondence: Email	Thank you for your interest in the project. Just to confirm we have added you to our database. As per your request WSP will continue to update you on the progress of the S&EIA Process for this project. Please don't hesitate to contact us if you have any further queries
As Town Planning Department, we hereby wish to register as IAP.	Name: Jeremy du Plessis Organisation: //Khara Hais Municipality Date: 20 July 2015 Form of Correspondence: Email	Thank you for your interest in the project. Just to confirm we have added you to our database. As per your request WSP will continue to update you on the progress of the S&EIA Process for this project. Please don't hesitate to contact us if you have any further queries
As the MunicipalTown Planning Department, we hereby wish to register as IAP.	Name: CW Geldenhuys Organisation: //Khara Hais Municipality Date: 20 July 2015 Form of Correspondence: Fax	Thank you for your interest in the project. Just to confirm we have added you to our database. As per your request WSP will continue to update you on the progress of the S&EIA Process for this project. Please don't hesitate to contact us if you have any further queries
3. Legislative Context		
Will an atmospheric emissions license be required for the	Name: Ordain Riba	An atmospheric emissions license is not required as no scheduled



Issues/Comment	Raised By	Response
development of the gravel and asphalt roads?	Organisation: Northern Cape Department of Environment and Nature Conservation Date: 14 October 2015 Form of Correspondence: Authority Meeting	processes are triggered. Noise and Air Quality Impact Assessments will be undertaken during the EIA Phase and the studies will be made available to the public.
4. Fauna and Flora		
1.1 Please register this office as a commenting authority and provide us with copies of the relevant documents. 1.2 Protected trees such as Acacia (Vachellia) erioloba (Camel Thorn) and Boscia albitrunca (Shepherd's Tree) are known to occur in the vicinity of Upington. These species are extremely slow-growing and long-lived. Impacts should be avoided as far as possible by placing the facility in an area where it will have the minimum impacts on protected trees. 1.3 Kindly ensure that you assess the impact on NFA listed protected tree species by providing an accurate estimation of the number, size and tree species to be destroyed during construction of the facility. Also indicate size of the development footprint (i.e width and length of roads and any other associated infrastructure) which may result in clearance of vegetation. 1.4 Sensitive areas with high densities of protected trees should be avoided as far as possible, especially for placement of temporary infrastructure during construction. 1.5 The developer should also consider the potential impacts on provincially protected plant species under the Northern Cape Nature Conservation Act, Act 9 of 2009 (NCNCA), which may not be disturbed or destroyed without a valid Flora Permit from the provincial Department of Environment and Nature Conservation (DENC) in Kimberley.	Name: Jacoline Mans Organisation: Department of Agriculture, Forestry and Fisheries (DAFF) Date: 15 July 2015 Form of Correspondence: Fax	 To assess habitat sensitivity and the impact on species with emphasis on protected species encountered; An evaluation of the potential impact of the proposed project on habitat and species; To consider short- and long-term impacts on biodiversity and highlight irreversible impacts or irreplaceable loss of species; and To make recommendations on impact minimisation in terms of the proposed project.
How many protected species will be destroyed during the development of the proposed HSPG?	Name: Jacoline Mans Organisation: Department of Agriculture, Forestry and Fisheries (DAFF) Date: 15 October 2015 Form of Correspondence: Authority Meeting	A Biodiversity Impact Assessment was undertaken by PB Consult and is dated 20 November 2015. Refer to Appendix 2-1 of the EIAR for the detailed study. Only three species listed in terms of the NCNCA were encountered along the route. All of these species are considered to be of Least Concern in terms of IUCN status (the International Union for the Conservation of Nature). A flora permit will have to be applied for in terms of the NCNCA if any of these species will be impacted. Acacia erioloba: A number of Camelthorn individuals were encountered within or near to the footprint in the areas of deeper sand. Fortunately, the locations of most of these trees are such that it should



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		be relatively easy to evade or minimise impact. The relocation of the bridge area and the reduction of the oval southern turn help enormously to reduce the impact on the overall number of trees that might be within the footprint. The reduction in the requirement for large open run-off areas adjacent to the high speed oval track will also aid the protection of the Camelthorn and Grey Camelthorn. Seedlings have a low survival rate and the trees have a very slow growth rate, which place emphasis on the protection of healthy seedbearing (mature) individuals. The overall objective must thus be to minimise impact on mature (seed bearing) individuals and that no individual larger than 6 m should be impacted.
		Acacia haematoxylon: The distribution (throughout the property) and numbers of the Grey Camelthorn is such that no matter how the infrastructure is placed it will be almost impossible not to have an impact on quite a number of these trees. Since they are so numerous GPS coordinates of their locations was not taken. Most of the trees are relative small individuals, rarely exceeding 4 m in height. Again they have a low seedling survival rate and slow growth rate. The aim should be to minimise impact on mature trees (wherever possible) and to protect all Grey Camelthorn trees larger than 5 m tall.
		Boscia albitrunca: Large numbers of Sheppard's trees were encountered on the property and like Camelthorn it is mostly associated with deeper sandy soils often associated thick stands of the common small tree or large shrub, Acacia mellifera (Blackthorn). In addition it is most often associated with dunes (less common in the inter-dune straaten). It should thus be possible to minimise impact by avoiding the dunes wherever possible, and utilising the inter-dune straaten for the placement of infrastructure. Where dunes have to be crossed it should aim at the shortest route across the dune crest (this will also benefit wind erosion protection — by not exposing dune crests). Again the aim should be to minimise (wherever possible) the impact on mature individuals. Some remarkable specimens were observed on the property.
		Boscia foetida: A few Stink-bushes was also encountered within or near to the development footprint towards the north west of the property. Again the aim should be to minimise the impact on mature individuals, especially older specimens.
		Approximately 470 protected trees were encountered, however not all of these trees will be removed.



Issues/Comment	Raised By	Response
Would it be possible to change the layout of the proposed HSPG?	Name: Jacoline Mans Organisation: Department of Agriculture, Forestry and Fisheries (DAFF) Date: 15 October 2015 Form of Correspondence: Authority Meeting	Some alternatives have been considered with regards to the position of the HSPG, refer to Section 6 of the EIAR.
The flora and fauna permits, from the Northern Cape Department of Nature and Conservation, can only be issued once an Environmental Authorisation has been obtained.	Name: Samantha De La Fontaine Organisation: Department Environment and Nature Conservation Date: 15 October 2015 Form of Correspondence: Authority Meeting	This has been noted.
Is the planned development expected to fall in the Kalahari Bio Region particularly the Dune Veldt Region? As the Dune Veldt is considered by the DENC: scientific services to be a sensitive region. It is advised that the proposed project does not significantly impact this area.	Name: Samantha De La Fontaine Organisation: Department Environment and Nature Conservation Date: 15 October 2015 Form of Correspondence: Authority Meeting	A Biodiversity Impact Assessment was undertaken by PB Consult and is dated 20 November 2015. Refer to Appendix 2-1 of the EIAR for the detailed study. The vegetation on the property, Gordonia Duneveld, is part of the Savanna Biome. Gordonia Duneveld is classified as "Least Threatened" (thus not under any immediate threat in terms of extinction) with more than 99% of its original extent remaining. However, it must be noted that the conservation target for this vegetation type has not yet been achieved. Gordonia Duneveld has a low species to area ratio (not particularly rich in plant species) and local endemism is very low. Meaning that the vegetation type is fairly similar over extended areas and it would be unlikely that small localised impacts (like this development) will have a significant impact on national or municipal conservation targets for this vegetation type (or even species). According to the Siyanda EMF, Gordonia Duneveld has a low conservation priority, and low sensitivity index. However, the soils have a wind erosion potential which will have to be managed.
Will an avifauna specialist study be undertaken?	Name: Ordain Riba Organisation: Northern Cape Department of Environment and Nature Conservation Date: 14 October 2015 Form of Correspondence: Authority Meeting	A Biodiversity Impact Assessment was undertaken by PB Consult and is dated 20 November 2015. Refer to Appendix 2-1 of the EIAR for the detailed study. The site falls within the distribution range of approximately 200 bird species known from the broad area. But because of the medium-high human activity it is not expected that a fair representation of these species will be encountered on site or its immediate vicinity.



Issues/Comment	Raised By	Response
		Some of the birds most often seen include, goshawk, black korhaan, fiscal shrike and sandgrouse. No ostriches were observed on the property. Apart from the possible impact on mature trees the proposed activity is not expected to have a significant impact on avi-fauna. However, it remains important that all larger indigenous trees must be protected wherever possible in order to minimise the possible impact (although localised) on bird species.
How many hectares of vegetation will need to be cleared for the development of the HSPG? Is it 200 hectares or 3750 hectares	Name: Ordain Riba Organisation: Northern Cape Department of Environment and Nature Conservation Date: 14 October 2015 Form of Correspondence: Authority Meeting	Approximately 200 hectares will need to be cleared for the HSPG development. The total size of the property is 3750 hectares.
The general opinion is that the project is positive for the proposed project from MBSA. The fencing measures to stop the wildlife from moving between the farms is also considered positive.	Name: Siebert Myburgh Organisation: Farmer Date: 15 October 2015 Form of Correspondence: Public Meeting	The comment has been noted.
5. Wetland		
The proposed project involves the development of a High Speed Proving Ground for vehicle testing for Mercedes Benz Research and Development Tem on Steenkamps Pan Farm 419/06 in the Northern Cape Province. The Department of Agriculture, Land Reform and Rural Development is guided by Act 43 of 1983 with the development of the abovementioned activities the developer must take care of the following: Article 7(3)(b) of regulation 9238: Conservation of Agriculture Resources, 1983 (Act 43 of 1983) Utilisation and protection of vilies, marches, water sponges and water courses. Article 7 (1) "no land user shell utilize the vegetation in a vlei or water sponge or within the flood area of a water course or within 10 meters horizontally outside such flood area in a manner that causes or may cause the deterioration of or damage to the natural agriculture resources" Article 7(3)(b) "cultivate of any land on his farm unit within the flood area of a water course or within 10 meters horizontally outside the flood are of a water course".	Name: Nico Toerien Organisation: Department of Agriculture, Land Reform and Rural Development Date: 07 September 2015 Form of Correspondence: Email	 The Conservation of Agriculture Resource Act, 1983 will be considered and adhered to throughout the scoping and EIR phase of the project to insure no harm occurs to the wetland located on the proposed property (Section 2 of the DSR) The landowner has been consulted with and has given permission to obtain the required environmental authorisation and Water Use License (WUL) for the proposed project (Section 10 of the DSR) It is proposed that once the project obtains the required environmental authorisations and WUL the property will be bought from the landowner by Mercedes Benz South Africa. A rezoning application will be undertaken for the proposed property and is being undertaken to coincide with the S&EIR process (Section 11.7 of the DSR).



Issues/Comment	Raised By	Response
Take also care of the following: Who is the current landowner, will it be a subdivision of land or a lease contract between the developer and the landowner?		
Rezoning will also be applicable because the land use will change from the current agricultural status.		
The Department of Agriculture, Land Reform and Rural Development foresee no problems in the development as mentioned above as long as the developer adheres to the articles of Act 43 of 1983.		
6. Water Related Issues		
The site has been identified to have a pan/wetland is this correct? Will a specialist study be undertaken?	Name: Revelation Moutshiwa Organisation: Department of Agriculture, Land Reform and Rural Development Date: 14 October 2015	A Wetland Delineation and Assessment was undertaken by Ixhaphozi Environmental Services CC and is dated 12 January 2015. Refer to Appendix 2-2 of the EIAR for the detailed study.
	Form of Correspondence: Authority Meeting	The project area occurs in an arid and marginal region in terms of wetland distribution. However, one pan wetland was identified based on landscape setting, vegetation and soil form. This wetland is locally important in terms of biodiversity and should be conserved; and an adequate buffer provided for. The track and mining (if restricted to outside the buffer area) will not have a detrimental impact on the wetland. Therefore a fatal flaw is not foreseen.
As stated in the presentation section 21(c) and Section 21(i) will be applied for in terms of the National Water Act 36, 1998. Therefore if drainage lines are present onsite wouldn't Listing	Name: Ordain Riba Organisation: Northern Cape Department of Environment and Nature Conservation	Refer to Appendix 6 of the EIAR for the Integrated Water Use Licence Application.
Notice 1 activity 19 be applicable?	Date: 14 October 2015 Form of Correspondence: Authority Meeting	In terms of the IWULA section 21(c) and Section 21(i) will be applied for in terms of the National Water Act 36, 1998. Culverts, bridges etc will be required to convey drainage around the oval and access road along the water tract (along SP3). Culverts etc as part of storm water management (drainage lines).
		WSP has included this activity in the EIAR.
There is not sufficient water for the construction of the HSPG, how will other water users be impacted?	Name: Phillip Coreejes and Siebert Myburgh Organisation: Farmer Date: 15 October 2015 Form of Correspondence: Public Meeting	A Geohydrological and Contamination Risk Assessment was undertaken by GEO - LOGIC Hydrogeological Consultants cc and is dated January 2016. Refer to Appendix 2-4 of the EIAR for the detailed study.
		Water will be tapped from existing and newly drilled boreholes for the



Issues/Comment	Raised By	Response
		project. Water will be used during two construction phases which will be 14 months for the first phase and 8 months for the second phase. The water demand during the first construction phase will be 300m³/d and during the second construction phase will also be 300m³/d. The time line for the second construction phase is not finalised yet but is expected to be concluded within the first 5 years after start of operations. During the operational phase of the project, the water demand will be much lower. Water will be used at the office site for washing, cleaning and ablution facilities. Bottled water will be used for consumption. During the operational phase the water demand for the development will be approximately 10m³/d.
		During the entire project the water demand for farming activities on Portion 6 of the farm Steenkampspan will be 6m³/d. Farming activities will in future be limited to 80 head of cattle. Water will be sourced from the exiting boreholes that are currently used for farming. During later stages when construction water is not needed, the farming activities may also source water from the production boreholes used for the construction purposes. The water demand for farming activities however will not exceed 6m³/d.
		During careful consideration of the important facts above and the other evidence that the aquifer can sustain the water abstraction during the construction phase of 22 months spread over 5 years, we regard the abstraction viable. During the operational phase of the project the aquifer will have ample time to recover for the farm to be used as stock farming unit. The water demand after the construction phase will be very low if compared to other farming units in the area. The farm Steenkampspan will be an area in which the aquifer can recover to be available in future for water abstraction for stock farming.
7. Waste Related Issues		
There have been anonymous reports that cars tested at other proving grounds are being burnt instead of correctly disposed of as waste or sent back to where they came from as originally discussed. The Department have been struggling to locate the areas where these cars are being burnt? Is there any chance that the cars will need to be dismantled and disposed of in South Africa?	Name: Revelation Moutshiwa Organisation: Department of Agriculture, Land Reform and Rural Development Date: 14 October 2015 Form of Correspondence: Authority Meeting	The cars will be taken back to Germany as they are prototype cars and necessary for the further development of the actual cars that will be developed and sold in the market. The cars are brought to South Africa to test under hot climatic conditions and to ensure the cars run optimally.
8. Social Issues		
What is the focus of MBSA on Learnership Programs?	Name: Revelation Moutshiwa Organisation: Department of Agriculture, Land	The focus of MBSA on learnership programs is to help people learn and deal with the complexity of technology as the motor industry is always developing and growing. The design of cars is becoming more



Issues/Comment	Raised By	Response
	Reform and Rural Development Date: 14 October 2015 Form of Correspondence: Authority Meeting	technical and as such it is a constant requirement to continue developing and improving the knowledge base of their staff. MBSA aims to provide the skills, knowledge and qualification to get them into a position where they can work on MBSA production lines.
Will these Learnership Programs be South African based or International?	Name: Revelation Moutshiwa Organisation: Department of Agriculture, Land Reform and Rural Development Date: 14 October 2015 Form of Correspondence: Authority Meeting	All learnership programs are South African based but have training programs in Germany, where South Africans have an opportunity to obtain skills, learn and understand the culture and expose them to various technical social engagements from Germany where Daimler is based. These programs hope to not only provide the correct skills but also establish the right networks that enable employees to develop in the field.
What is MBSA social cooperate Responsibility with specific reference to Job creation?	Name: Ordain Riba Organisation: Northern Cape Department of Environment and Nature Conservation Date: 14 October 2015 Form of Correspondence: Authority Meeting	A Social Impact Assessment was undertaken by Tony Barbour Environmental Consulting and Research and is dated October 2015. Refer to Appendix 2-6 of the EIAR for the detailed study. Based on information from MBSA the construction phase for the proposed HSPG is expected to extend over a period of ~ 2 years (Stage 1 of Construction estimated to be ~ 14 months and Stage 2 of Construction estimated to be ~ 8 months). The ~ 2 year construction phase will create approximately 200 employment opportunities. Of this total ~ 15% (30) will be skilled, 30% (60) semi-skilled and 55% (110) low skilled. The majority of the low and semi-skilled workers will be historically disadvantaged individuals (HDIs). The majority, if not all, of the low and semi-skilled workers employed during the construction phase are also likely to live in Upington and surrounds. The //Khara Hais Local Municipality (KHLM) IDP notes that unemployment in the area and creation of employment opportunities represents a key challenge. The proposed project will therefore assist to create employment opportunities. In addition to the business and employment opportunities associated with the hospitality and tourism sector (see above), the operational phase will create opportunities for local catering, cleaning, transport and maintenance companies. This includes transport of equipment and vehicles to the site, on-site catering and cleaning etc. Providing
		these services will create opportunities for businesses in Upington. In addition, the HSPG and the associated security fencing etc. will need to be maintained. This will also create opportunities for local engineering contactors and service providers. A percentage of the monthly wage bill earned by the Mercedes Benz personnel involved in the testing will also be spent in the regional and local economy. This benefit will extend over the entire year. The benefits to the local and regional economy will extend over the operational lifespan of the



Issues/Comment	Raised By	Response
		project, which is anticipated to be decades.
9. Traffic		
What does the traffic impact assessment include? Will air traffic be assessed?	Name: Revelation Moutshiwa Organisation: Department of Agriculture, Land Reform and Rural Development Date: 14 October 2015	A Traffic Impact Assessment was undertaken by WSP Parsons Brinckerhoff and is dated 7 October 2015. Refer to Appendix 2-3 of the EIAR for the detailed study.
	Form of Correspondence: Authority Meeting	The traffic impact assessment will include a general assessment of the daily traffic that is in the area as well as what the potential impact would be due to an increase in traffic from the High Speed proving Ground (HSPG) during the construction and operational phase. Air traffic will not be affected by the HSPG and as such will not be assessed.
How will the development of the HSPG affect the main access road? Currently there is minimal maintenance on the road and as such it might impact the access to the HSPG. Are there any plans to upgrade this road in the future?	Name: Siebert Myburgh Organisation: Farmer Date: 15 October 2015	A Traffic Impact Assessment was undertaken by WSP Parsons Brinckerhoff and is dated 7 October 2015. Refer to Appendix 2-3 of the EIAR for the detailed study.
	Form of Correspondence: Public Meeting	The expected maximum daily traffic on the DR3322 will remain below the threshold to make it economically viable to surface the road with a bituminous seal, in accordance with the TRH20(7) guidelines.
10. Noise Issues		
What is the noise impact expected to be? How long is the construction phase expected to take?	Name: Phillip Coreejes Organisation: Farmer Date: 15 October 2015	An Environmental Acoustic Impact Assessment was undertaken by WSP Environmental and is dated 25 November 2015. Refer to Appendix 2-11 of the EIAR for the detailed study.
	Form of Correspondence: Public Meeting	Acoustic model results confirmed that noise levels at all nearby farm house receptor locations will be low, with no changes in the existing noise levels predicted during both the construction and operational phases. The highest noise levels during the construction phase are predicted around the quarry and borrow pit areas as well as at locations scattered along the high-speed oval, dependant on where specific construction equipment will be located at a given time. The highest noise levels during the operational phase are predicted along the high-speed oval, multifunctional area and handling track.
		The acoustic impacts of the HSPG were evaluated using a risk matric which assessed the severity, extent, duration, probability and confidence of potentially significant impacts. Based on this rating system, it was calculated that the acoustic impacts of the proposed project are expected to be "Low".



Issues/Comment	Raised By	Response
11. Mining Related Issues		
What material will be used for the construction of the HSPG? Where will the material be obtained from?	Name: Revelation Moutshiwa Organisation: Department of Agriculture, Land Reform and Rural Development Date: 14 October 2015 Form of Correspondence: Authority Meeting	The material required for the construction of the HSPG will potentially be sourced on-site. This will depend on the quality and quantity of material that is required. The material will be sourced from a combination of cut-to-fill activities and from dedicated areas containing the required material. If all the required material cannot be sourced on-site some material
		may have to be imported from off-site. The sourcing of material off-site may prove to be costly.
Do you not require a mining permit from the Department of Mineral and Resources in terms of the Mineral and Petroleum Resource Development Act 28, 2002 (MPRDA)?	Name: Revelation Moutshiwa Organisation: Department of Agriculture, Land Reform and Rural Development Date: 14 October 2015 Form of Correspondence: Authority Meeting	A legal opinion was obtained with regards to whether a mining permit would be required. The extraction of material for the development of the HSPG falls under section 106 exemption of the MPRDA as MBSA will be the landowner by the time the material will be extracted. The material will only be used for the development of the HSPG and as such no material will be transported offsite or sold for alternative use.
Will an exemption letter be obtained under Section 106 of the MPRDA from the Department of Mineral Resources (DMR)?	Name: Ordain Riba Organisation: Northern Cape Department of Environment and Nature Conservation Date: 14 October 2015 Form of Correspondence: Authority Meeting	The DMR does not issue exemption letters as it is a factual enquiry.
A concern is raised that if no exception letter is obtained other authorities may issue a fine with the assumption that a mining permit should have been obtained due to a lack in knowledge of section 106 of the MPRDA. It is requested that if possible, attempt to contact the department to obtain some form of letter stating that this exception is applicable	Name: Revelation Moutshiwa Organisation: Department of Agriculture, Land Reform and Rural Development Date: 14 October 2015 Form of Correspondence: Authority Meeting	The concern is noted. An attempt will be made to obtain a letter stating that the exemption is applicable to the project. However, ultimately there is no actually approach to obtaining such a letter. The Environmental Impact Assessment Report will however discuss the process of extracting the material, processing and how the material will be used. Impacts will be identified and mitigation measures implemented for the extraction of the material.
Will material need to be obtained for the development of the HSPG? Where will the material be obtained? Will material need to be obtained from the neighbouring farms?	Name: Siebert Myburgh Organisation: Farmer Date: 15 October 2015 Form of Correspondence: Public Meeting	The material required for the construction of the HSPG will potentially be sourced on-site. This will depend on the quality and quantity of material that is required. The material will be sourced from a combination of cut-to-fill activities and from dedicated areas containing the required material.
		If all the required material cannot be sourced on-site some material may have to be imported from off-site. The sourcing of material off-site may prove to be costly.



Issues/Comment	Raised By	Response
12. Development and Layout Design		
Would it be possible to change the layout of the HSPG to avoid these critical areas where protected species are expected to occur? How many species are expected to be destroyed?	Name: Ordain Riba Organisation: Northern Cape Department of Environment and Nature Conservation	Some alternatives have been considered with regards to the position of the HSPG, refer to Section 6 of the EIAR.
	Date: 14 October 2015 Form of Correspondence: Authority Meeting	A Biodiversity Impact Assessment was undertaken by PB Consult and is dated 20 November 2015. Refer to Appendix 2-1 of the EIAR for the detailed study.
		Only three species listed in terms of the NCNCA were encountered along the route. All of these species are considered to be of Least Concern in terms of IUCN status (the International Union for the Conservation of Nature). A flora permit will have to be applied for in terms of the NCNCA if any of these species will be impacted.
		Acacia erioloba: A number of Camelthorn individuals were encountered within or near to the footprint in the areas of deeper sand. Fortunately, the locations of most of these trees are such that it should be relatively easy to evade or minimise impact. The relocation of the bridge area and the reduction of the oval southern turn help enormously to reduce the impact on the overall number of trees that might be within the footprint. The reduction in the requirement for large open run-off areas adjacent to the high speed oval track will also aid the protection of the Camelthorn and Grey Camelthorn. Seedlings have a low survival rate and the trees have a very slow growth rate, which place emphasis on the protection of healthy seedbearing (mature) individuals. The overall objective must thus be to minimise impact on mature (seed bearing) individuals and that no individual larger than 6 m should be impacted.
		Acacia haematoxylon: The distribution (throughout the property) and numbers of the Grey Camelthorn is such that no matter how the infrastructure is placed it will be almost impossible not to have an impact on quite a number of these trees. Since they are so numerous GPS coordinates of their locations was not taken. Most of the trees are relative small individuals, rarely exceeding 4 m in height. Again they have a low seedling survival rate and slow growth rate. The aim should be to minimise impact on mature trees (wherever possible) and to protect all Grey Camelthorn trees larger than 5 m tall.



Boscia albitrunca: Large numbers of Sheppard's trees were encountered on the property and like Camelthorn it is mostly associated with deeper sandy soils often associated thick stands of the

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		common small tree or large shrub, Acacia mellifera (Blackthorn). In addition it is most often associated with dunes (less common in the inter-dune straaten). It should thus be possible to minimise impact by avoiding the dunes wherever possible, and utilising the inter-dune straaten for the placement of infrastructure. Where dunes have to be crossed it should aim at the shortest route across the dune crest (this will also benefit wind erosion protection – by not exposing dune crests). Again the aim should be to minimise (wherever possible) the impact on mature individuals. Some remarkable specimens were observed on the property. **Boscia foetida:** A few Stink-bushes was also encountered within or near to the development footprint towards the north west of the property. Again the aim should be to minimise the impact on mature individuals, especially older specimens. Approximately 470 protected trees were encountered, however not all of these trees will be removed. If the number of species to be destroyed is considered to be critical an alternative layout could be considered however it may not be considered feasible as there a certain specifications that need to be met.	
13. Services			
The Sewage will be pumped out from the conservancy tank. What is the arrangement for final disposal of the sewage?	Name: Revelation Moutshiwa Organisation: Department of Agriculture, Land Reform and Rural Development Date: 14 October 2015 Form of Correspondence: Authority Meeting	The sewage will be disposed of at the municipal facility, and authorisation has been obtained.	
14. Confidentiality			
How important is confidentially for the testing of the vehicles for MBSA and to protect the designs from other automotive companies? My property is situated adjacent to the proposed location and has a direct view into the HSPG.	Name: Siebert Myburgh Organisation: Farmer Date: 15 October 2015 Form of Correspondence: Public Meeting	Confidentiality is very important when testing prototype cars and MBSA. The degree of confidentiality will be determined by what stage the design is in.	
15. Fire			
Fire is a serious concern? How will the risk of fire be controlled such as the length of the grass?	Name: Phillip Coreejes Organisation: Farmer	Refer to Appendix 4 of the EIAR for the Environmental Management Programme Report.	



Issues/Comment	Raised By	Response
	Date: 15 October 2015	
	Form of Correspondence: Public Meeting	The fire prevention and protection systems design criteria have been based on requirements determined by site layout, building layout, building occupancy classification, equipment installed and general activities carried out on site and inside buildings. The design criteria are further strictly controlled by National and Local Government Regulations. All areas inside buildings are classified as per regulations, this is
		based on type of activity, fire risk factor and total of occupants.
		As the facility does not have municipal water supply or a constant guaranteed water feed system the fire water supply requirements need to be met by installation of bulk water tank and pump system.
		A single land road will run along the fences and this will serve as a fire break.

