

PRE-APPLICATION COMMENTS (19 October – 18 November 2016) – BOSCHENDAL VILLAGE

DATE	COMMENT	I&AP	RESPONSE	RESPONDENT
GENERAL				
17 November 2016	<p>We support the general approach of the proposed development project which:</p> <ul style="list-style-type: none"> • Is compatible with the Stellenbosch Municipal SDF intention to use nodal development to enhance and retain the traditional open agricultural land use and vistas. VASSA would emphasize that it is essential to maintain urban edges into the future to protect viable agricultural activity and rural environments. • Recognizes that, while the site, itself, does not offer architecturally significant buildings, the project must be designed to support the exceptional architectural and cultural significance of the surrounding heritage farms, scenic routes and the broader Dwars River Valley. (heritage Resources, BAR pp60/61) <p>In particular, we strongly support the proposal’s commitment to:</p> <ul style="list-style-type: none"> • Protect the iconic view cone from the R310 toward the Boschendal homestead and the mountains behind; • Protect the view from the Boschendal homestead north past the new development toward the mountains to the north; • Maintain a green buffer along the R310 Scenic Route; and • Develop building form complementary to, without copying, local heritage buildings. <p>Furth, we support the implementation of the recommendation of the Heritage Assessment Report (BAR, Appendix G12) and Urban Design Framework (BAR, Appendix G2). With respect to these two elements of the proposal document, VASSA also notes the observation made in the Conclusion of the Basic Assessment Report (page 21), “The overall heritage impact of Alternative 5 (a, b or c), including the mandatory controls and guidelines specified in the Urban Design Report and recommended mitigation measures is regarded as potential medium-high positive. However, should these mandatory controls, guidelines and mitigation measures not be implemented, then the overall heritage impact of the proposed development is potentially medium-high negative.” The proposed development must make provision for ongoing implementation of the controls, guidelines and mitigation measures.</p> <p>While we feel that the details of architectural language will be critical aspect of the success – or not – of the development, we do not have a comment at this time on the specific elements of the Architectural Indicators and Controls. (16l and 16m: Heritage Indicators). However the HIA refers to</p>	<p>Dr. André van Graan - <i>The Vernacular Architecture Society of South Africa</i></p> <p>Asa Gordon – <i>Cape Institute for Architecture</i></p>	<p>In terms of the management and monitoring of the development, Pg. 67 of the Urban design Framework details the design review process and refer to various steps to be taken to ensure implementation of the project meets the design requirements.</p> <p>This includes aspects such as the appointment of architects on the project, the review mechanism and approval process and the establishment of an architectural review committee.</p> <p>The comments are noted and welcomed.</p>	<p>Philip Briel Architects</p> <p>NB, SW, DD & PL</p>

	<p>“the proposal to apply for World Heritage Site status for the Stellenbosch Winelands has important implications for development in the area, and particularly for maintaining the landscape integrity of the vineyards and mountain slopes in general”.</p> <p>It’s critical that systems be put in place for the monitoring and management of development over time. This will be essential to ensure the ongoing management of the scale and detail of development in the village, as well as the critical interface between the proposed village and the surrounding historically significant environment.</p>			
18 November 2016	Mr. Doug Jeffery’s based on the current situation and what is being proposed, I as resident and affected of the Dwarsriver Valley, strongly object against the Boschendal Village Development on portions 7 & 10 of Farm 1674 Boschendal.	Desmond Adams – <i>Representative of Kylemore as Trustee on Boschendal Treasury Trust</i>	Noted.	DJEC
17 November 2016	Project Team: Some of your Team Members are known to us and we are satisfied with the Project Team for the Project especially with the inclusion of Mr P Louw who was previously involved with the proposals for the Pniel Church Werf and Urban Design input for the upgrading of R310 as per request from the community to the Western Cape Government.	JP de Wet – <i>CONSULTEAM (Pty) Ltd</i>	Noted.	DJEC
18 November 2016	The Department has no objections if the following will be considered and addressed in the process: <ul style="list-style-type: none"> • All relevant legislation in respect to the above will be adhered to; • The application is considered within the context of the long term spatial and economic plans of the area • That the safety and economic welfare of members of the immediate community will be considered. 	Lukhanyo Qamarana – <i>Western Cape Government: Economic Development and Tourism: Regional & Local Economic Development</i>	Noted. This is the intention.	DJEC
17 November 2016	In light of our comments, we cannot support this development.	Malcolm Johnson – <i>Pniël Baptist Church</i> Lilburne Cyster – <i>Pniel Community Forum</i>	Noted.	DJEC
18 November 2016	Firstly, thank you for adhering to the Act no.107 of 1998 instructing you to have a broad public participation process with the people of the Dwars River Valley. Unfortunately many of these people today still do not know anything about the proposed development. Secondly, I hereby strongly	Desmond Adams – <i>Representative of Kylemore as Trustee on</i>	The purpose of the open house meeting was so that interested and affected parties could learn about the proposed development and provide comment. Objection noted.	DJEC

	object against the development.	<i>Boschendal Treasury Trust</i>		
30 November 2016	<p>IMADCO is mainly premised and founded on two very broad development objectives: (1) Promoting appreciation of cultural diversity as one of the pillars to effect inclusive sustainable development principles. (2) Economic and social development as another pillar of sustainable development principles.</p> <p>Over 22 years into our very fragile constitutional democracy South Africa hasn't open up and develop more inclusive sustainable human settlements. The new upcoming Boschendal Village of approximately 440 units of mixed human settlements promises to usher in a new paradigm shift through providing space for low income, middle income and high income households with economic retail and tourism outlets. Western Cape local communities have always been overlooked and overtaken by Gauteng in terms of economic opportunities and new partnerships involving Western Cape business entrepreneurs and new growth.</p> <p>Thank you to Boschendal farm for coming up with this new opportunity to help addressing the community needs in ways enhancing the restoration of human dignity. Opportunities for new beginnings. We submitting interests for 50 members IMBADU Housing Group to secure space to build houses for themselves and/or capable individuals to purchase erven privately. There are few people earning less than R3,500 per month and more earning over R3,500 to more or less than R20,000 per month just on average terms.</p>	Imbadu Ma-Afrika Development Consortium (Imadco)	The housing opportunities IMADCO seeks are not provided for in this development. There are opportunities for this kind of development elsewhere in the broader node. The query for housing in this income bracket should be addressed to the municipality who deals with subsidised housing projects.	@Planning
26 October 2016	<p>This Branch has no further comments on this development in terms of the National Environmental Management Act 107 of 1998. The comments made in this Branch's letter of paragraph 1.2 above are still applicable.</p> <p>This Branch will comment in detail on the development in terms of the Land Use Panning Act 3 of 2014 upon receipt of the land use application.</p>	Grace Swanepoel - <i>Western Cape Government: Transport and Public Works: Road Network Management</i>	Noted.	DJEC
20 January 2017	<p>From an agricultural production point of view the Western Cape Department of Agriculture (WCDOA) has no objection to the proposed layout plan (October 2016)</p> <p>The WCDOA however wishes to caution the deciding authorities against the precedent this may set as to new development nodes in rural areas and the pressures it can create on abutting land.</p> <p>This proposal is supported but with the view that it be limited to the current layout proposal. Further abutting development to the South, East</p>	Cor van der Walt - <i>Western Cape Government: Agriculture: Land Use Management</i>	<p>Noted.</p> <p>Noted.</p>	<p>DJEC</p> <p>DJEC</p>

	<p>and North will not be supported as it is considered intrusive on agricultural land. Only limited development may be entertained on the Rhodes Food Group Factories Area to the West of this proposed development.</p> <p>Please note that in terms of the Subdivision of Agricultural Land, Act no. 70 of 1970, section 3 (f) states: “no area of jurisdiction, local area, development area, peri-urban area or other area referred to in paragraph (a) or (b) of the definition of “agricultural land” in section 1, shall be established on, or enlarged so as to include, any land which is agricultural.”</p> <p>In terms of above, the consent of the National Minister of Agricultural, Forestry and Fisheries (DAFF) must also be obtained.</p>		<p>An application has been made to DAFF in terms of the Subdivision of Agricultural Land Act.</p>	DJEC
TRAFFIC AND ACCESS				
17 November 2016	<p>The Rhodes Food Group would like to register the following:</p> <ol style="list-style-type: none"> 1. The Rhodes Food Group (RFG) Factory access is not temporary. 2. RFG cannot forgo light vehicle access to either of our sites. 3. We are willing to consider alternate access to the factory from the south provided that there are no cost implications for us. 4. We support the idea of a roundabout at the T-junction of the R45 and the R310. A roundabout at this junction is preferable to a traffic light option. The proposed lane markings on the R310 approach, however, shows that only a left-in left-out (LILO) movement will be possible from the RFG Head Office access. This proposal impacts on the accessibility to our Head Office site which we cannot agree to. An alternative solution will need to be found. <p>We are willing to engage further with you on the matters raised above and look forward to hearing back from you.</p>	<p>Bernadette Lakey – <i>Rhodes Food Group</i></p>	<ol style="list-style-type: none"> 1. Noted. 2. Noted, the TIA does not propose closure of any of the access to RFG. 3. Noted, we can meet to discuss a mutually beneficial solution during the detailed design phase. <p>The road Design Engineer will review the design to maintain full access to this entrance.</p>	Andrew Bulman
17 November 2016	<p>The Traffic Impact Assessment is based on a ‘Traffic Count’ that was done in 2014. An estimate of what the traffic situation will be in 2019 is given. We doubt whether that estimate is reliable. Traffic is already heavy on the Helshoogte Road (R310) through Pniel. Locals struggle to get onto the R310 from the side roads. This development will increase the traffic flow through Pniel much more than the estimate, which will increase the risks of accidents. This will also be very dangerous and risky for pedestrians especially the aged and our children. Already motorists have no respect for our town and drive as if this is a high way. Apart from this, there will be an increase in noise levels and air pollution. After all, this is a rural area and we would like to keep it as such.</p>	<p>Malcolm Johnson - <i>Pniel Baptist Church</i></p> <p>Lilburne Cyster – <i>Pniel Community Forum</i></p>	<ol style="list-style-type: none"> 1. The traffic count was undertaken by an independent traffic survey company and we have no reason to doubt the accuracy of this data. Projections to 2019 were based on historical growth rates, which is in accordance with accepted traffic engineering practice. 2. It is estimated in the TIA that only 27% of the newly generated traffic will arrive/depart via Pniel. The majority of trips are expected to make use of the R45 to access the site. 	Andrew Bulman
17	Roundabouts on the R310: we support your proposal to provide	JP de Wet –	Noted	Andrew Bulman

<p>November 2016</p>	<p>roundabouts on R310 as a measure for traffic control and to designate the settlement areas along the road. The Western Cape Government should also note that there are various settlement areas along this road e.g. Kylemore, Johannesdal, Pniel and Lanquedoc. Our proposal will therefore be for two roundabouts on R310 to indicate the start and the end of all the settlement areas.</p> <p>Trees along the R310: The Project Team should note that the community has previously requested the Western Cape Government to implement a design for this road that will appropriate for traffic accommodation and ensure that most of the trees along the road are preserved. You will therefore note that the cross section of the road was amended (scaled down) from that which was initially envisaged by the Western Cape Government. We also mention that the client has also subsequently received an award for this road. Mr P Louw, who is also a member of your Project Team, has also made Urban Design input for the road at the time. We would therefore suggest that the same approach be followed with any amendments to the design of the existing road.</p>	<p><i>CONSULTEAM (Pty) Ltd</i></p>		
<p>17 November 2016</p>	<p>Please note this letter is meant to be read in conjunction with an attachment showing figures 1 & 2 which I am also sending to you. We wish to submit the following comments.</p> <p>We strongly support the proposed use of traffic circles and all measures to slow traffic and ensure safety of pedestrians (and people in vehicles). We are strongly opposed to the option of traffic lights (robots) at the T-junction of the R45 and R310 and also on the R310. The T-junction of the R45 and R310 has been an extremely dangerous intersection ever since the R45 was upgraded about 20 years ago and traffic started to drive at high speed along the R45. We feel traffic circles are preferable for the following reasons:</p> <ul style="list-style-type: none"> a.) Studies have well documented that traffic slows more for traffic circles and they are safer. Traffic often speeds up at the sight of traffic lights and even when the lights turn orange. We feel that traffic lights will inevitably cause more deaths and injuries at the T-junction than a traffic circle. b.) Traffic lights cost more money to maintain and run with electricity. Our area has had, and is likely to have future, power outages, which create further danger at a traffic light operated intersection. This danger is not created by traffic circles. c.) Groot Drakenstein is a beautiful historic part of South Africa. Traffic lights are urban and unsightly and will 	<p>Dr Simon Pickstone-Taylor and Mrs Wendy Pickstone - <i>Lekkerwijn</i></p>	<p>Noted and agreed.</p> <p>The TIA analysed both a signalised intersection and a roundabout option and recommended that the roundabout option is preferable for the same reasons stated in this comment.</p> <p>i.e.</p> <ul style="list-style-type: none"> - A roundabout will easily be able to accommodate the expected traffic - A roundabout is a traffic calming mechanism that will slow traffic down on the R45 - Roundabouts are more aesthetic and low-maintenance in country environments <p>Pedestrian crossing points at the roundabout will, however, have to be carefully designed to ensure the crossings are safe. These will be linked to a localised network of formal pedestrian facilities in the area, such as protected sidewalks, public transport embayments and safe crossing points matched to desire lines.</p> <p>As part of the detailed design of the road upgrades, the speed limits on the approaches to the roundabouts and adjacent to the village environment will be appropriately reduced to meet minimum safety standards.</p>	<p>Andrew Bulman</p>

	<p>detract significantly to the look and feel of the heart of our proposed country village of Groot-Drakenstein and urban area.</p> <p>Linked to Point above; Residents of Meerlust Bosbou, Pniel, and Lanquedoc, as well as farm labourers and their families living or working on the nearby farms (all of whom come from previously disadvantaged communities) walk on foot along the R45 and R310 and cross it. The stretch of the R45 and R310 within the 'designated urban edge' should all have speed limit reduced to 60km/hour.</p> <p>See Figures 1 and 2 (attached to this email Diagram of Urban Edge at Groot Drakenstein, Page 15 from "Stellenbosch Municipality, Spatial Development Framework(SDF), November 2012"). We have confirmed with Lawrence Ramakuwela, Senior Town Planner of Stellenbosch municipality, that the SDF of 2012 is the current planning document governing the definition of the urban edge by the Stellenbosch Municipality. The whole of Lekkerwijn and a considerable portion of Meerlust Bosbou fall within this urban edge. There has been high pedestrian traffic for years within this defined 'urban edge'. Farm traffic such as tractors pulling fruit bins along the R45 into Imibala's entrance on the R45, are in danger from fast moving traffic (at 100km/hour and faster at present). The high speed is likely to continue (with traffic lights in particular). Slowing the traffic to 60km/hour along within the defined urban edge of the R45 and R310, will undoubtedly save lives in the future, particularly those of the previously disadvantaged community living locally.</p> <p>We understand that the South African authorities might have felt unable financially to install the appropriate changes to the R45 and R310 to make the area safer. As there is now the opportunity to have Boschendal pay for these changes, there is no excuse for not making the area as safe as possible for the local community and people in vehicles. It is well known to the police and all who live in the area that far too many people have died or been seriously injured at the R45 and R310 intersection and along these stretches of roads over the last 20 years. To not reduce the speeds, would be to ignore the economic realities of the local people from previously disadvantaged communities and their needs, for the dubious advantage of letting traffic pass through the area in a slightly faster time.</p>			
SERVICES				
17 November 2016	<p>Bulk Services: We have enquired about the provision of bulk services for the Project specifically the treatment of sewer effluent from the Project. One of the team members, at the Open House meeting, indicated that the intention was to construct a pump station for pumping the sewer to the</p>	JP de Wet – <i>CONSULTEAM (Pty) Ltd</i>	Yes. The sewer pump-station and rising main is for the area as a whole in accordance with the municipality's masterplanning. The structures will be designed for the ultimate full capacity required, and the pumps will be	ICE

	<p>3. Further to the above, the Planning Report included addresses the policy topics of the Provincial Spatial Development Framework (PSDF, 2014), among other, car free transport and the provision that a settlement must reduce the demand for private cars. The report addresses this requirement by arguing that <i>all amenities are within walking distance</i>. This would be true if the spectrum of needs as in point 2 above are satisfied. This Department remains concerned that if the larger community of the proposed node simply stay within the node and have to work, do daily shopping, worship and go to school elsewhere, it will remain largely dependent on private transport.</p> <p>4. Another policy topic of the PSDF addressed is the promotion of compact mixed use and integrated settlements. Whilst the proposed development is to provide housing for middle and upper-income groups the Meerlust housing development is said to satisfy the need for low income and subsidized housing within the node. It is essential that the settlement of the node is a functional integrated and interconnected node. In this sense the proposal must show how it intends to uplift a low income component of the node and contribute to an inclusive Groot Drakenstein node to ensure integration with the latter so that it is not excluded from the services and opportunities created within the node.</p> <p>5. The various upgrade and construction of municipal services to provide for the proposed development should form part of the application for Environmental Authorization in terms of the national Environmental Management Act, 107 of 1998.</p> <p>6. The implementation of the recommendations contained in the Boschendal Village Green Report (2016) must be detailed in the planning process.</p> <p>7. Public transport must be addressed and detailed in the planning process.</p>		<p>In respect of primary schools, the CSIR Guidelines for Social Facilities indicate that the threshold for a primary school is 7000 people whilst the threshold for a crèche is 2000 people. The Provincial Guidelines on the other hand indicates ±1000 households as the threshold for a primary school. The Boschendal Village alone does not warrant the provision of a primary school.</p> <p>Two community meeting places are provided which can also be used by churches. All of these facilities are in an accessible location on for the village residents and within walking distance.</p> <p>3) It is not practical that a small village node will be completely contained and not generate external trips for people who work elsewhere. However, it does generate the opportunity for people to move closer to where they work: people currently working in Franschhoek but living in Stellenbosch would be enabled to move closer to work thereby reducing overall trip distances. The overall effect is reduced trip distances in the municipality.</p> <p>4) The proponent has meet with representatives from the BTT and confirmed that revenue generated from the sale of properties will be paid to the BTT and used to support development in the Dwars River Valley. This may include the development of the Meerlust community area.</p> <p>The development will also contribute towards and construct bulk infrastructure which will serve any other development in the node</p> <p>5) All other comments on what should be included in the EIA and planning application (points 5, 6, and 7) is noted and will be incorporated.</p> <p>6) All other comments on what should be included in the EIA and planning application (points 5, 6, and 7) is noted and will be incorporated.</p> <p>7) On Public Transport: The developer of Boschendal Village is not responsible to provide public transport</p>	<p>@Planning</p> <p>Tony Barbour</p> <p>@Planning</p> <p>@Planning</p> <p>@Planning</p> <p>@Planning</p>
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			on an ongoing basis. However proposals in the TIA recommend construction of taxi embayments and pedestrian crossings for public transport along the R310 as well as paved cycle routes and pavements along the R310. These proposals are detailed in the TIA.	
17 November 2016	<p>We would like to point out that Boschendal’s planners have interpreted Stellenbosch Municipality, Spatial Development Framework(SDF), November 2012” referred to above in their own way in their diagrams. Leaving the whole of Lekkerwijn as it is with no development in the urban edge and merely part of a ‘scenic drive’, as opposed being within the ‘designated Urban edge’ which Lawrence Ramakuwela has confirmed is the case. We have met with Lawrence Ramakuwela to discuss our proposals for Lekkerwijn, where we wish to build a clinic to provide mental health services that will benefit children and adolescents in particular, but also adults. We wish to clinic services in a way as to provide services to the local community, who do not have the finances to afford these services from private medicine and many of the services are not even available in the state sector for children and adolescents. We want Stellenbosch Municipality to be aware that Lekkerwijn wishes to exercise its rights to at least partial development within the currently accepted ‘urban edge’.</p>	Dr Simon Pickstone-Taylor and Mrs Wendy Pickstone - <i>Lekkerwijn</i>	Noted. This was done.	@Planning
17 November 2016	<p>We feel the 100 room hotel will change the nature and feel of the area radically. Groot Drakenstein is one of the last few relatively unspoilt historic rural areas of great importance and beauty. A newly built hotel for 100 people will change this irreversibly in a direction that will detract from the historic and unspoilt nature. I believe that this development is at odds with Objective 5 listed under planning context.</p> <p>We are pleased to see that Objective 6 of the proposals planning context is to “end the apartheid urban settlement structure by breaking down spatial barricade...” and that “inclusionary housing should be provided where possible.” As we understand it there is no guarantees laid down in the proposal for these aims to be met, e.g. a certain amount of the housing being reserved for previously disadvantaged people living and working in the area. This remains one of our biggest concerns and this needs to be rectified for Stellenbosch Municipality to agree to this proposal.</p> <p>As we understand it, Boschendal presently plans to make 5% of the housing available to their workers, some of whom are from previously disadvantaged communities. This 5% will likely live in the smallest units and be a window dressing, and highly unlikely to result in real integration. The village will effectively be a home for super wealthy whites and the</p>	Dr Simon Pickstone-Taylor and Mrs Wendy Pickstone - <i>Lekkerwijn</i>	<p>The hotel will not be a separate entity, but will be incorporated into the village built fabric. We therefore do not regard it as something that will damage the heritage aspect of Boschendal. It will be located on disturbed land, and will be internal to the village, thereby having no external impact on neighbours.</p> <p>The developer is contributing in more than one way to objective 6. One such way is to ensure some dwellings are made available to key workers. This is currently not statutorily enforced and is being pioneered by Boschendal on a voluntary basis. The model that will be put in place will aim to ensure the SDF objectives are achieved. We do not think it is appropriate for surrounding land owners to be prescriptive about the implementation of subsidised accommodation in a development.</p> <p>Another socio-economic contribution is the establishment of a community trust where to a percentage of sales are contributed.</p> <p>Other indirect contributions are local labour practices</p>	@Planning

	<p>coloured and black people in the urban edge of Groot Drakenstein will almost exclusively live in relative poverty in Meerlust Bosbou. This would in fact be the exact replica of Apartheid era structure to the proposed village.</p> <p>Although Stellenbosch municipality might be wanting more residential units for people living in the municipality, the nature of the Boschendal proposal, makes it highly likely that many of the units will be bought be people who do not even live in the new houses, but keep them as vacation homes or holiday rental. The Franschoek valley is extremely desirable and there is very little available under R3-4million for people to buy. It remains a highly popular place to buy property for Europeans who come out for short periods of the year for sunshine, or even people living in Cape Town or other parts of South Africa to come and spend weekends. Estates like La Pettite Provence in Franschoek have many similarities; many of the smaller units of 2 bedrooms stand empty most of the year, owned by Europeans (or South African) who come out for Christmas holidays and even bigger homes are used in this way, or just held empty as investments. Thus there is a high risk that this village as it stands will do very little to create accommodation for people (within Stellenbosch municipality) who wish to live in Groot Drakenstein to do so. This is particular the case for people like nurses, teachers and policemen who serve the local community and have a salary, but cannot compete financially with wealthy people who want a holiday pad in our valley. For farm workers the case is even more extreme. Even homes of R1 to R2million are out of these people's price ranges and a 1 bedroom unit in this proposed village is likely to go for at least R1.5million.</p> <p>We feel that if this village is to be truly "inclusive" and "end the apartheid urban settlement structure by breaking down spatial barricade...", it should only be allowed by Stellenbosch municipality if the following conditions have to be met by Boschendal:</p> <ul style="list-style-type: none"> a.) 25% of the housing is held in a suitable trust for people from previously disadvantaged communities. These people could pay a reasonable, reduced rent to the trust for their accommodation. b.) We are against ownership being given to the people occupying these (25%) houses, as the housing is likely to increase in value over night and the temptation to sell the homes on for R1million or more profit will be overwhelming and the housing will rapidly all be owned by wealthy , mostly white owners. If ownership was allowed, there should be safeguards put in place that these units could only be sold, at suitably affordable prices to previously disadvantaged people from the local community. However we see the latter as difficult to guarantee in the long 		<p>during the construction phase as well as education programme.</p> <p>In terms of the development, 10% of the housing units will be made available to Key Workers (teachers, police personnel, health workers, municipal workers etc.,) and key Boschendal workers.</p> <p>The development also includes provisions for a school, crèche, clinic and public spaces that will all be open to the local community in the area, not just the residents of the proposed village.</p> <p>The proponent has also met with representatives from the BTT and confirmed that revenue generated from the sale of properties will be paid to the BTT and used to support development in the Dwars River Valley.</p>	<p>Tony Barbour</p>
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	<p>term.</p> <p>It is very difficult to see how the current proposal without any restrictions and structures (of the sort proposed above) put in place, would result in anything else than the village being almost exclusively owned by very wealthy people with no historic links to the area. The only area likely to retain previously disadvantaged (and presently still very disadvantaged communities) will be the Meerlust Bosbou area. Again, this would in fact be an exact replica of apartheid.</p> <p>Sadly previous owners of Boschendal have recently done huge damage to the local community (particularly the coloureds and blacks whose families have lived and worked on the farms for 100's of years in many cases), by removing them from their small groups of houses (some of which stand in the land about to be used for this village) they lived in and dumping them in Lanquedoc, with minimal or no social planning or input, resulting in chronic crime, violence and misery of its residents on a scale never seen in the valley before. There is widespread serious drug use (Tik), crime and violence, including regular murders in this community. Thus Lanquedoc is effectively a no-go area for many people wishing to live in the area.</p> <p>There is dire need for affordable housing for e.g. teachers and nurses at local government schools. There is an existing state clinic within this plan. I feel it would be appropriate for example for accommodation to be provided at an affordable rental to the health care staff working in the clinic within the village. As suggested already, we feel a trust or suitable structure should retain 25% of the housing for people like this to live in, while paying a reasonable rental. This 25% accommodation could be made available only to people who are working on Boschendal or with poorer residents in the local communities of Groot Drakenstein, Pniel, Kylemore, Simondium and even Franschhoek (where the cost of accommodation is far too high for e.g. most teachers working government schools.)</p> <p>This is a real opportunity of ensuring some of the wrongs of the past are put right and also that a truly integrated (racially) village is created as a model for the whole of South Africa. There is a big danger that this will be a lost opportunity unless suitable conditions are put in place before any further permissions are granted by Stellenbosch municipality.</p> <p>A portion of the Boschendal village appears to go outside the "urban edge designated by the Stellenbosch municipality – i.e. the portion going up to the existing Blue gum avenue. I have not received a response on this point made in my letter of June 2015.</p>			
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	<p>The same slide refers to Construction Phase Social Impacts and Potential Positive Impacts: Creation of business and employment. Boschendal has already proven, with other construction activities on the estate that they are not interested in our local construction and building companies and they rather preferred to use companies far outside the Dwarsrivier Valley. We therefore are very sceptical of the claim that this development will have any positive impact on business opportunities.</p> <p>At the moment unemployment is rife in the Dwarsrivier Valley. Many of those unemployed people worked on the farms before, but still Boschendal prefers to import workers from outside the Valley, and many of those workers are from outside our country. Needless to say, the promise that this development will provide employment for our local communities is questionable. Boschendal does not show any empathy with this situation (unemployment) and do not have any respect for our people in our Valley. However, those people of the Dwarsrivier Valley working at Boschendal are subjected to high levels of unfair labour practices under the new management at Boschendal. There is a high turnover rate of workers/staff under the new management of Boschendal. Workers feel intimidated and bullied into submission when they dare speak about the unfair labour practices. This is in stark contrast to the highly acclaimed Boschendal brand and the promises that are made to create the impression that Boschendal has an ethical social responsibility with the best interest of the community of the Dwarsrivier Valley at heart.</p> <p>It is mentioned that 5% of the houses will be accessible to so called key workers/staff of Boschendal. Who are these workers? Those in senior management positions? This basically excludes the local people in the Dwarsrivier Valley.</p>		<p>Currently we have 2 construction projects being completed at Boschendal. Both of these projects are being completed by a previously disadvantaged individual from Franschhoek (Groendal) and the labour that he uses is from the surrounding areas. In addition to this, please see the following list of local subcontractors that are being used on a regular basis.</p> <p>Tiler – Resident of Kylemore Carpentry and Joinery – Resident of Kylemore Metalwork and welding – Resident of Lanquedoc Electrician – Resident of Groendal Painting – Resident of Groendal</p> <p>Boschendal is a major employer in the area since the new owners have taken over, previously there were a total of 30 permanent employees, which has now increased to over 300 permanent employees. In terms of the comment about unfair labour practices, Boschendal pays 30% more than minimum wage, is constantly educating and upskilling their work force. The only time that external labour is brought onto the farm is when there is a peak that cannot be handled by the permanent residents. When there is this peak, a local labour broker is utilised.</p>	<p>Boschendal</p> <p>Boschendal</p>
17 November 2016	<p>Housing: Your layout indicates that provision was made for high density residential development. There are limited opportunities for the accommodation of growth from inhabitants of the existing settlement areas in the Dwarsriver Valley. The question is therefore if any provision is made for accommodation of inhabitants from the settlement areas in the proposed Boschendal Development which would qualify for housing prices between kR800 to kR1.5m</p>	<p>JP de Wet – <i>CONSULTTEAM (Pty) Ltd</i></p>	<p>The SIA notes that housing provided by the proposed development will not address the current housing needs of the low income sector. However, the 135 medium and 232 high density units will create opportunities for middle to higher income members of the local community to acquire property in the area. The proposed development will therefore create opportunities for young professionals from the area to buy property in the Dwars River Valley in a compact, well-designed mixed use development that includes landscaped public open spaces, shops and restaurants etc. However, the majority of homeowners are likely to come from outside of the Dwars River Valley.</p>	<p>Tony Barbour</p>
18	<p>2. Social and Economic Impact.</p>	<p>Desmond Adams</p>	<p>The proponent has met with representatives from the BTT</p>	<p>Tony Barbour</p>

November 2016	<p>As experienced with the previous owners of Boschendal nothing actually to realise what is spelled out by the abovementioned Act. When ownership shifted to the current owners, they made it very clear that they do not owe the people of Valley a thing. Although promises are made in the proposal we know that the Heritage Act will not be adhere to in terms of the above.</p> <p>3. Housing Opportunities. It is very clear no that no opportunity will be given to residents of the Valley in terms of housing as they do not have the financial capacity - prices will be on purpose be out of reach. It means that the development will be for foreigners and we will be strangers in our own Valley. This is unacceptable.</p> <p>4.INTERGRATION. The proposal is aimed to foster integration of people thus also of activities. The current electrified fence between Boschendal and it adjacent communities is a definite effort to do just the opposite - practicing what was painful before 1994 and currently still.</p> <p>5. ACCESS to Conservation Areas. This was a burning issue during the initial discussions with the first owners of Boschendal. Those promised conservation areas were never given as stated in deed of donations. The current owners made it very clear - No Access for those born in the Valley by erecting electrified fences.</p>	<p>– <i>Representative of Kylemore as Trustee on Boschendal Treasury Trust</i></p>	<p>and confirmed that revenue generated from the sale of properties will be paid to the BTT and used to support development in the Dwars River Valley.</p> <p>Housing The SIA does indicate that the housing provided by the proposed development will not address the current housing needs of the low income sector. However, the 135 medium and 232 high density units will create opportunities for middle to higher income members of the local community to acquire property in the area. The SIA also notes that the majority of homeowners are likely to come from outside of the Dwars River Valley.</p> <p>Integration The SIA does note that while the urban design framework highlights the importance of public access and the provision of public spaces, care will need to be taken to ensure that members from the local community are encouraged to access and use these spaces. In this regard there is a risk that members from the local community may be made to feel unwelcome, which would, in turn limit the benefits of these spaces for the local community.</p> <p>Access to conservation areas This issue falls outside the scope of the current SIA and EIA.</p> <p>However, access to the conservation areas can be obtained by registering yourself with the security who will then allow you access to the areas.</p>	<p>Tony Barbour</p> <p>DJEC</p>
18 November 2016	<p>Namens die gemeente van Pniel Congregational Kerk wile k hiermee formeel beswaar aanteken teen die beoogde ontwikkeling soos uiteengesit in die dokumentasie soos beskikbaar gestel in "Proposed Mixed Use development on Portion 7 and 10 of Farm 1674, Boschendal (Boschendal Village).</p> <p>Die kern van ons beswaar is dat daar gedurende 2004 – 2005 indringende gesprekke tussen Boschendal en die gemeenskappe van die Vallei plaasgevind het, om planne en strategiee te bespreek om die</p>	<p>Rev. Leon Klate – <i>Pniel Congregational Church</i></p>	<p>The proponent has met with representatives from the BTT and confirmed that revenue generated from the sale of properties will be paid to the BTT and used to support development in the Dwars River Valley.</p>	<p>Tony Barbour</p>

	<p>ontwikkeling van die Vallei op 'n langtermyn volhoubare koers te plaas. In gevolge hierdie onderhandeling is daar dienooreenkomstig 'n sosiale kontrak opgestel en onderteken duer alle belanghebbende partye.</p> <p>Die ooreenkoms is inderneem in die gees van samewerking wat gestalte sou gee aan die ideale soos in ons grondwet vervet word. Dit sou 'n nuwe fase van vertroude en samewerking bevorder, gesien in die lig van die drie eeue se onreg wat ons nuwe demokrasie voorafgegaan het.</p> <p>Dit is vir die gemeente onmoontlik om die voorstelle wat nou gemaak word in die dokumentasie wat beskikbaar gestel is vir kommentaar, te vereenselwig met die ethos van die ooreenkoms en die besluitneming van 2004 – 2005. Dit sny teen die grein van al die beginsels wat ooreengekom is met Boschendal oor hoe ontwikkeling in die Vallei onderneem sou word, om reg te laat geskied soos bedoel word in ons grondwet, en die tersaaklike wette en beleid wat ons glo eerbiedig moet word om ons gemeenskaplike ideale tot uitvoer te bring.</p> <p>Gesien teen bogenoemde agtergrond het ons geen keuse as om amptelik beswaar aan te teken teen die ontwikkelingsvoorstelle.</p>			
17 November 2016	<p>Our understanding is that this new village has been allowed by Stellenbosch municipality as more homes are needed for people to live in. A hotel might help with some job creation locally, but it means less new homes which is the top priority in our area. There are already many people with jobs in the area who cannot find any housing locally to buy.</p>	Dr Simon Pickstone-Taylor and Mrs Wendy Pickstone - <i>Lekkerwijn</i>	The SIA does indicate that the housing provided by the proposed development will not address the current housing needs of the low income sector. However, the 135 medium and 232 high density units will create opportunities for middle to higher income members of the local community to acquire property in the area. The SIA also notes that the majority of homeowners are likely to come from outside of the Dwars River Valley.	Tony Barbour
TOURISM				
30 November 2016	<p>Fourthly, simultaneously, for tourism sector purposes we would also like to propose building designs with African physical features and symbols such as modern African rondavels complementing modern western buildings with sustainability to provide African cuisines, performing arts through music, books, poetry, drama and traditional dance and new opportunities.</p> <ul style="list-style-type: none"> ○ Well scheduled programmes for cross cultural interactions, human relations and languages ○ Coordinated social cohesion turns for diverse children, youth, adult's learnings and business dialogues for inclusive growth. ○ Social impact empowerment models, skills exchange and new partnerships <p>➤ Two rondavels: offer oral teachings, African cuisine, research, and the Madiba Legacy Tourism Centre</p>	Imbadu Ma-Afrika Development Consortium (Imadco)	Various indicators have influenced the design of the proposed village. For more detail refer to the Urban Design Report attached as Appendix G2.	DJEC

	<ul style="list-style-type: none"> ➤ Education centre – ECD for children grounded on powerful African heritages and values, with isiXhosa, English, Afrikaans, SeSotho, Mandarin and Swahili with a long term vision to demonstrate inclusive society in words and actions through new pragmatic economic strategic partnerships 			
ARCHITECTURE				
30 November 2016	<p>Building design architecture incorporating the African designs and natural resources.</p> <ul style="list-style-type: none"> ➤ Ambient of natural resources, sunshine, daylight, wind and temperatures where possible ➤ North facing roof, buildings' temperatures control in summer and winter ➤ New solar panels harnessing water vapour and turn it into drinkable water ➤ Solar panels for water heating, harness electricity, and water harvest ➤ Greening with eco trees, plants, and beautiful organic vegetable garden ➤ Some efficient management of resources, waste management and recycling purposes ➤ With immediate and long term benefits that includes: <ul style="list-style-type: none"> ○ Financial savings on electricity, water and carbon footprint reduction ○ Establish partnerships with the green funding and international investments ○ Ecological stewardship, caring for God's creation, and innovations ○ Innovative business entrepreneurship, and greening ways 	Imbadu Ma-Afrika Development Consortium (Imadco)	<p>Architectural guidelines pg. 62 of the Urban design framework document refers to the application of green technology in buildings.</p> <p>The design of architectural forms and related built elements should:</p> <ol style="list-style-type: none"> 1. conform to the principles of the relationships between buildings to street space, as defined by the compulsory building lines: 2. Contribute towards 'Green Architecture which includes: <ul style="list-style-type: none"> - Local water capture through a series of surface run water furrows and dealing with storm water runoff. - Climate control through use of traditional building forms and openings, including promotion of party walls, cross ventilation and recessed covered verandas. - Appropriate design in reaction to the orientation of the site. - Planting to shade buildings and minimize heat reflection off hard landscape surfaces. - Promoting the use of solar energy and obscuring unsightly panels from view behind roof parapet walls. - Employing recycling practices. - The use of Green materials - A minimum of 50% of building energy requirements to be provided through sustainable technologies. 3. Promote a sense of community. 	Philip Briel Architects
EIA PROCESS				
18 November 2016	<p>Comments from, but not limited to, the following relevant authorities must be obtained during the Public Participation Process ("PPP"):</p> <ul style="list-style-type: none"> • Department of Agriculture, Forestry and Fisheries; • Department of Agriculture; • Department of Water and Sanitation • Department of Transport and Public Works; • Heritage Western Cape; • CapeNature; • Stellenbosch Municipality; and • Transnet 	Arabel McClelland – <i>Western Cape Government: Environmental Affairs and Development Planning: Directorate: Development Management (Region 2)</i>	<p>A copy of the report and request for comment was sent to all the authorities listed here but nothing has been received to date from DAFF and Transnet. Refer to Appendix F10 of the BAR as proof. Refer to this document and Appendix F15 for comment from the remaining authorities.</p>	DJEC

<p>In addition to the above, it is requested that comment is obtained from the South African Heritage Resources Agency, given that the Dwars Rover Valley is a provisional National Heritage Site.</p> <p>Furthermore, as noted in CapeNature’s comment, in light of the Berg River Improvement Plan, it is requested that the Departments Pollution and Chemicals Management Directorate is consulted with respect to the potential impact of the proposed development</p> <p>Please be reminded that the relevant service providers are to provide written confirmation of sufficient capacity to provide the necessary services for the proposed development.</p> <p>Specifically with respect to sewage and effluent disposal, it is requested that clarity is provided on the applicable timeframe for the proposed and approved upgrade of the existing Pniel sewer pump station and Dwars River Waste water Treatment Works respectively, this is to ensure that the aforementioned infrastructure will have sufficient capacity to accept sewage/ effluent from the proposed development when required.</p> <p>Please note that where service infrastructure or upgrade thereof forms part of the proposed development, this must be included in the project description and relevant sections of the BAR and Environmental Management Programme (“EMPr”). Although it is noted that various proposed upgrades and pipelines fall below the applicable thresholds or are to be located within road reserves, it must be ascertained if any of the proposed associated infrastructure itself triggers the listed activities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) Environmental Impact Assessment (“EIA”) Regulations, 2014. This pertains particularly to any watercourse crossings and the potential new water reservoir located above Pniel. In such a case, the assessment thereof must also be included in the BAR, <u>along with the co-ordinates, erf/farm numbers and SG codes of the affected land parcels</u></p> <p>Similarly, as noted above, “off-site” service infrastructure, namely pipelines, will cross various watercourses and therefore may necessitate maintenance work in future. In light of the inclusion of a Maintenance Management Plan (“MMP”) in terms of Activity 19 of Government Notice No. 983, it is recommended that such future maintenance work for such</p>		<p>Refer to Appendix F15 for a copy of the SAHRA comment as well as Appendix E2.</p> <p>The report was submitted to DEADP Chemicals and Pollution for comment, no comment has been received to date. Refer to Appendix F10 for proof.</p> <p>The Services Capacity Letter is attached as Appendix E1 of the BAR.</p> <p>Refer to the capacity letter included as Appendix E1. The intention is to upgrade the WWTW in 2017/2018. All required infrastructure for the respective services of the different phases of the development will have to be in place before occupation thereof.</p> <p>The pipeline and reservoir site were assessed in the freshwater assessment, and the crossings were included in the Water Use risk assessment.</p> <p>Upgrade to the Dwars River WWTW was assessed during a separate EIA process.</p> <p>The proposed pipeline crossing any watercourses have been assessed by the Freshwater Specialist, the Botanist and included in the WULA. Any mitigation measures recommended by the specialist are included in the BAR and EMP.</p> <p>The proposed reservoir has now been confirmed to be a municipal reservoir which is not listed in terms of NEMA as it falls within an area containing no natural vegetation. This has been confirmed by DEA&DP in a separate application</p> <p>Pipe co-ordinates have been included in the BAR. The MMP has been updated to include any future maintenance work required for the pipelines crossing the various watercourses.</p>	<p>DJEC</p> <p>DJEC</p> <p>DJEC</p> <p>ICE</p> <p>Kate Snaddon (Freshwater Consulting Group)</p> <p>DJEC</p> <p>DJEC</p> <p>DJEC</p> <p>DJEC</p>
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	<p>“off-site” infrastructure, for example, the pipeline crossings, is also included in the MMP. Should the Department agree to the proposed MMP, this future maintenance work specified within the MMP would not require an Environmental Authorisation prior to the undertaking thereof. Please be advised that the MMP relates to the aforementioned listed activity only.</p> <p>Due to the sensitive receiving environment of the proposed development, it is required that cumulative and regional impacts are considered and assessed during the BAR process</p> <p>The applicant/EAP is reminded to include the following PPP information, in terms of the EIA Regulations, 2014, in the BAR for decision-making:</p> <ul style="list-style-type: none"> • Details of the public participation process undertaken in terms of regulation 41 of these Regulations, including copies of the supporting documents and inputs; and • A summary of the issues raised by Interested and Affected Parties (“I&APs”), and an indication of the manner in which the issues were incorporated, or the reasons for not including them. <p>A number of comments, concerns and objections have been raised thus far in the environmental application process by I&APs. The applicant and EAP are advised that <u>all</u> comments and issues raised by I&APs must be adequately addressed during the environmental application process. Specifically in this regard, it is considered insufficient to merely refer to the Social Impact Assessment when responding to socio-economic issues raised during the process.</p> <p>Please ensure all relevant mitigation measures recommended by the respective specialists are included in the EMPr, where practical and appropriate.</p> <p>Please note that omission of any required information in terms of Appendices 1 and 4 of GN R.982 with regards to the submission to the Department of the BAR and EMPr respectively may result in the application for environmental authorisation being refused.</p>		<p>This has been done.</p> <p>This is included in the BAR.</p> <p>Refer to this document.</p> <p>Noted.</p> <p>This has been done.</p> <p>Noted.</p>	<p>DJEC</p> <p>DJEC</p> <p>DJEC</p> <p>DJEC</p> <p>DJEC</p> <p>DJEC</p>
HERITAGE				
<p>18 November 2016</p>	<p>The SIG supports the findings and recommendations of the HIA, and trusts that it will lead to an acceptable development in the Grade I landscape. Regarding the visual impact, the following should also be mentioned:</p> <p><u>Building Heights</u>: The SIG shares the concerns regarding building heights expressed in the VIA, and is of the opinion that building heights of more than two storeys should not be considered for any section of the</p>	<p>Patricia Botha and Berta Hayes – <i>Stellenbosch Interest Group</i></p>	<p>A variation in building heights is regarded as an important factor in providing a degree of diversity and to avoid urban and architectural homogeneity. Such variation is considered to contribute to village character. The location of three storey structures has been carefully sited to function as street liners and as feature elements on street corners.</p>	<p>NB, SW, DD & PL</p>

	<p>development. (Two and a half storeys, i.e. 'n third storey within the roof space is also not appropriate.)</p> <p><u>Traffic Circles:</u> Only traffic circles (including at the intersection of the R310 and Central Avenue) with calming measures as expressed in the Urban Design Framework document, should be used. Please refer to the 8th point listed under section 2.3 (page 10). No traffic lights should be introduced along the R310 or R45.</p>		<p>The densities established support a range of land uses which contribute to diversity and urban vitality.</p> <p>The VIA raises a concern with the building massing of three storeys in Precincts E1 and E2, as this could detract from the rural character of the area. The HIA supports the recommendation that more refined articulation of building elevations and roofscapes be prepared at precinct plan level.</p> <p>The issue of traffic circles and traffic lights is addressed in the traffic section. The draft HIA has stressed the need for all engineering interventions to be subservient to issues related to the significance of the cultural landscape.</p>	
18 November 2016	Heritage Act is very clear - ANY DEVELOPMENT should be benefitting the DISADVANTAGE RESIDENTS - in this case the Previously Disadvantaged OF THE DWARSRIVER VALLEY.	Desmond Adams – <i>Representative of Kylemore as Trustee on Boschendal Treasury Trust</i>	The social Impact assessment (SIA) deals comprehensively with the potential social and economic benefits to the local community, in particularly previously HD groups and individuals. Benefits include employment opportunities, housing opportunities (10% of proposed housing stock for affordable housing for key workers), community facilities (market square, public open space network, pre-school creche, upgrade of existing clinic), community initiatives (food nutrition programmes, skills development programmes) and the formation of a Trust to fund the range of community development initiatives (5% of the value of initial sales and 0.5% of subsequent sales).	NB, SW, DD & PL
17 February 2017	Comment was received from Heritage Western Cape.	Andrew September - <i>HWC</i>	This was responded to by the heritage specialists in the HIA. Refer to Section 12 of the HIA included as Appendix G12 in the BAR.	DJEC
4 April 2017	Comment was received from SAHRA.	Gcobani Sipoyo - <i>SAHRA</i>	This was responded to by the heritage specialists in the HIA. Refer to Section 12 of the HIA included as Appendix G12 in the BAR	DJEC
BIODIVERSITY				
22 November 2016	As mentioned in our comments on the background information document (BID), according to the Western Cape Biodiversity Framework (WCBF) there are a few patches within the proposed development area which are labelled as undetermined in terms of terrestrial biodiversity. In the draft internal version of the provincial spatial biodiversity plan, these sections have been classified as ecological support areas (ESA).	Rhett Smart - <i>CapeNature</i>	Noted.	DJEC

	<p>WWTW upgrade application.</p> <ul style="list-style-type: none"> The connecting sewerage infrastructure however forms part of the existing application and would consist of collection via a gravity main to a pump station located east of the proposed development which would then be pumped via a rising main along Helshoogte Road to Pniel. It is assumed that the bulk sewer pipeline will connect to the existing sewerage network in Pniel and that the crossing of the Dwars River is an existing pipeline. The pipeline adjacent to Helshoogte road will be within an existing transformed footprint and therefore is unlikely to result in the loss of terrestrial biodiversity and does not require further assessment by the botanical specialist. There will be several minor watercourse/drainage line crossings which have been assessed by the freshwater specialist. These are all considered acceptable provided the recommended mitigation measures are implemented. The sewer pump station is however located below the 1:50 and 1:100 year floodlines. It would be preferred that the sewer pump station be located outside of the floodlines, however this may not be technically feasible – this should be confirmed. Should this be the only alternative, it must be ensured that the pipeline and pump station are constructed to be able to withstand damage from extreme rainfall events and to minimize any possibility of sewage entering the Dwars River. This must be confirmed by the relevant engineer. The pump station is however located outside of the riparian zone of the Dwars River. It must be ensured that there is no impact on the Dwars River and the riparian edge during the construction phase. <ul style="list-style-type: none"> The bulk potable water supply is also proposed to connect to the water reticulation in Pniel. The bulk water main will also follow the Helshoogte Road until Pniel, after which it will be located on the upslope edge of the settlement until it terminates at a new proposed reservoir directly to the west of the town. It should be noted that the western section traverses areas classified as undetermined in the WCBF, and which are ESA in the draft internal version of the provincial spatial biodiversity plan. 		<p>Yes it is an existing pipeline.</p> <p>Noted.</p> <p>The sewer pump station has been located at the best point on the edge of the floodplain against the railway fill embankment, to also take that into account that it will still in future have to receive flow from the other side of the Dwars River from a gravity main that can be tied to the side of the railway bridge without crossing through the river, as well as from future rising mains from the north of the R45.</p> <p>As described in the Services Report, the pump station will be designed and constructed within strict environmental protection guidelines and rules. Its substructures will all be of watertight concrete, and the floor-level and adjacent manhole cover levels will all be above the 1 in100 year flood-levels. Back-up measures will include stand-by pumps, a telemetry link to the maintenance depot for operation and alarm signals, a back-up generator with fuel supply, overflow to an emergency storage tank, connections for manual bypass pumping into the rising main using emergency transportable pumps brought in.</p> <p>Noted. The Botanist has reviewed the pipeline routes and has noted that the route is unlikely to disturb any patches of intact, significant natural vegetation. 98% of the route passes through road reserve, dense alien vegetation or agricultural land of no conservation value. The remaining 2% of the route passes through heavily degraded Boland Granite Fynbos of Medium sensitivity.</p> <p>See response above. Refer to Appendix G9 for the letter from Nick Helme in this regard.</p>	<p>DJEC</p> <p>DJEC</p> <p>ICE</p> <p>DJEC</p> <p>DJEC</p>
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	<ul style="list-style-type: none"> • It is noted that the botanical specialist report did not include an assessment of the bulk services. The bulk services layout was not included in the BID, and therefore we could not provide any preliminary comments in this regard. Either the botanical specialist report should be amended to include the bulk services, or there should be sufficient evidence provided that the proposed pipeline and reservoir will not impact significantly on terrestrial biodiversity. Recommendations should be provided regarding the rehabilitation of the pipelines. Search and rescue may be required if threatened species are encountered, otherwise correct and careful management of topsoil can ensure that there is adequate rehabilitation of the pipeline. • An assessment of the proposed bulk water infrastructure was included in the freshwater specialist assessment. The impacts will be similar to that of the bulk sewerage infrastructure, with three additional watercourse crossings. The proposal can be considered acceptable provided the recommendations are implemented. • A stormwater management plan has been included, which has applied sustainable urban drainage system (SUDS) principles and allows for two on-site stormwater detention ponds. The stormwater management system is integrated with the existing wetlands on and adjacent to the site, which is acceptable as the wetlands are not pristine, unmodified features. The freshwater specialist study has indicated that the proposed stormwater management system is acceptable, which CapeNature agrees with. • The inclusion of the greening report is supported as this has an indirect positive impact on biodiversity, although the report is relatively brief and broad-brushed. • Further to the development proposal consisting of a new urban node within a rural environment, it must be ensured that planning considerations are taken into account, in terms of precedents. While the current application does not have any direct highly significant impacts on biodiversity, new urban nodes in rural areas do result in indirect cumulative impacts on biodiversity. • In terms of the landscaping proposal, CapeNature does not object to the proposal to include species which are not locally indigenous. The site currently contains minimal natural vegetation and is surrounded by agricultural lands, in addition to the proposed heritage concept, therefore this is considered acceptable. It must however be ensured that no listed alien invasive species are used in the landscaping (both CARA and NEM:BA). However, we do recommend that the section of existing wetlands as identified in the freshwater specialist report are excluded from any landscaping and that all non-locally indigenous species are removed from the wetlands. The extensive open space areas within the development 		<p>The proposed reservoir has now been confirmed to be a municipal reservoir which is not listed in terms of NEMA as it falls within an area containing no natural vegetation. This has been confirmed by DEA&DP in a separate application This has been looked at by the Freshwater Specialist and is included in the MMP and WULA.</p> <p>Noted.</p> <p>Noted.</p> <p>Agreed and noted.</p> <p>Noted.</p> <p>Noted.</p>	<p>DJEC</p> <p>DJEC</p> <p>DJEC</p> <p>DJEC</p> <p>DJEC</p>
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	<p>will still function as an ESA for the disturbance tolerant species that would currently be accommodated on the site.</p> <ul style="list-style-type: none"> It should further be noted that the Boschendal landholdings occupy a significantly larger area than the proposed development footprint encompassing several cadastres. CapeNature is in the process of negotiating formal conservation of a section of the landholdings in collaboration with a partner, namely WWF (WWF Sustainable Fruit Initiative). As the current application is restricted to transformed areas on separate cadastres, the formal conservation process need not be a consideration in this application. However, this may not apply to other applications on the Boschendal landholdings. <p>In conclusion, CapeNature recommends that further detail is provided regarding the potential impacts on natural vegetation associated with the bulk services for the project in particular the proposed bulk potable water pipeline and reservoir, in addition to providing appropriate recommendations. CapeNature does not object to the remainder of the proposal subject to the comments above, including further motivation regarding the location of the sewer pump station.</p>		<p>Noted.</p> <p>Refer to responses above.</p>	<p>DJEC</p> <p>DJEC</p>
FRESHWATER				
<p>17 November 2016</p>	<p>From the Basic Freshwater Ecosystem Impact Slide (slide 19a-e) it is clear that the development will have a negative impact on our Freshwater Ecosystems. At least one activity on the Boschendal Estate is already polluting one if the natural streams that feeds the wetlands and the Dwars River. This might increase with the proposed development. Disturbance of Fauna and Flora in the river, the river itself, and the risk of introducing alien vegetation will be too high with this development. The riverbank will be altered; sewer pipes and pump station, built for this development, will collect sewage by gravity – a high probability of sewage leakage into the wetlands and the river. Pipelines conveying sewage will be installed, crossing watercourse and ditches, to the Pniel Waste Water Treatment Works. Again, the risk of polluting our watercourses and damage to the environment. At this stage the local communities are complaining that the Pniel WWTW cannot/struggle to accommodate the existing generated waste water. This plant will definitely not be able to accommodate an increase in the capacity caused by any future additions to the plant.</p>	<p>Malcolm Johnson - <i>Pniël Baptist Church</i></p> <p>Lilburne Cyster – <i>Pniel Community Forum</i></p>	<p>A number of mitigation measures have been proposed to reduce the negative impacts associated with the development, and with implementation of these mitigation measures, the layout proposed as Alternative 5b is the most acceptable option from a freshwater ecological impact. Mitigation of impacts would reduce the significance of the negative impacts to a negligible to low negative significance, with the exception of the risk of water pollution from the sewage pipeline and pump station, which is considered to be low to moderate negative significance.</p> <p>The risk of introducing or spreading invasive alien plants can be reduced through a comprehensive and consistent management programme, where all planted and natural areas are monitored for IAPs and kept free of them.</p> <p>Regarding the capacity of the Dwars River WWTW, it is understood that upgrade of the WWTW will be a condition of the development.</p> <p>Boschendal complies with all legal requirements relating to the rivers and ecosystems within and surrounding Boschendal. If the author of this comment has any evidence of the pollution they claim is being caused by</p>	<p>Kate Snaddon (FCG)</p> <p>Boschendal</p>

			Boschendal, they must please approach Boschendal and make them aware of this.	
	WULA/GA			
26 January 2017	<p>The proposed interventions trigger water uses in terms of sections 21 (c) “impeding or diverting the flow of water in a watercourse” and (i) “altering the bed, banks, course or characteristics of a watercourse” of the National Water Act, 1998 (Act No. 36 of 1998).</p> <p>As mentioned in the document, the applicable Water Use registration forms were submitted to the Department; please be advised that the Department is in the process of assessing the application forms.</p>	F Rhoda - <i>Department:</i> <i>Water &</i> <i>Sanitation</i>	The General Authorisations have been issued. Refer to Appendix J of the BAR.	DJEC