MP STREAM ENVIRONMENTAL
AND SAFETY PLANNERS (PTY) LTD
Reg No: 2021/318370/07

The Proposed Integrated Residential Development, Tenbosch, Komatipoort, Mpumalanga Province

Draft Scoping Report

November 2021

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Contents

LIST OF TABLES

APPENDICES

1. OVERVIEW OF THE PROJECT

1.1 Introduction

The Department of Human Settlement is proposing to clear approximately 1 900 hectares of vegetation on portion 55 and 59 of the farm Tenbosch 162-JU, for the development of an integrated residential development, near Komatipoort, Mpumalanga Province.

In accordance with the National Environmental Management Act 107 of 1998, GNR 983 of 2014 (as amended in 2017), an Environmental Authorisation (EA) is required before the commencement of any such proposed activities.

There are various drainage lines and wetlands within the proposed project area and therefore the applicant is also applying for a Water Use License in terms of Section 21 of the National Water Act 36 of 1998 (NWA 36, 1998).

1.2 Location

The proposed site is located along the N4 near Komatipoort, Mpumalanga Province on the following farm names and portion numbers:

Portion 59 of the farm Tenbosch 162 JU
Portion 55 of the farm Tenbosch 162 JU

21-digit Surveyor General codes:

- T0JT00000000016200055
- T0JT00000000016200059

Central coordinates of the site are:
25° 28'16.09"S
31° 53'45.10"E

Please refer to the locality map below, Figure 1 and the layout map, Figure 2.

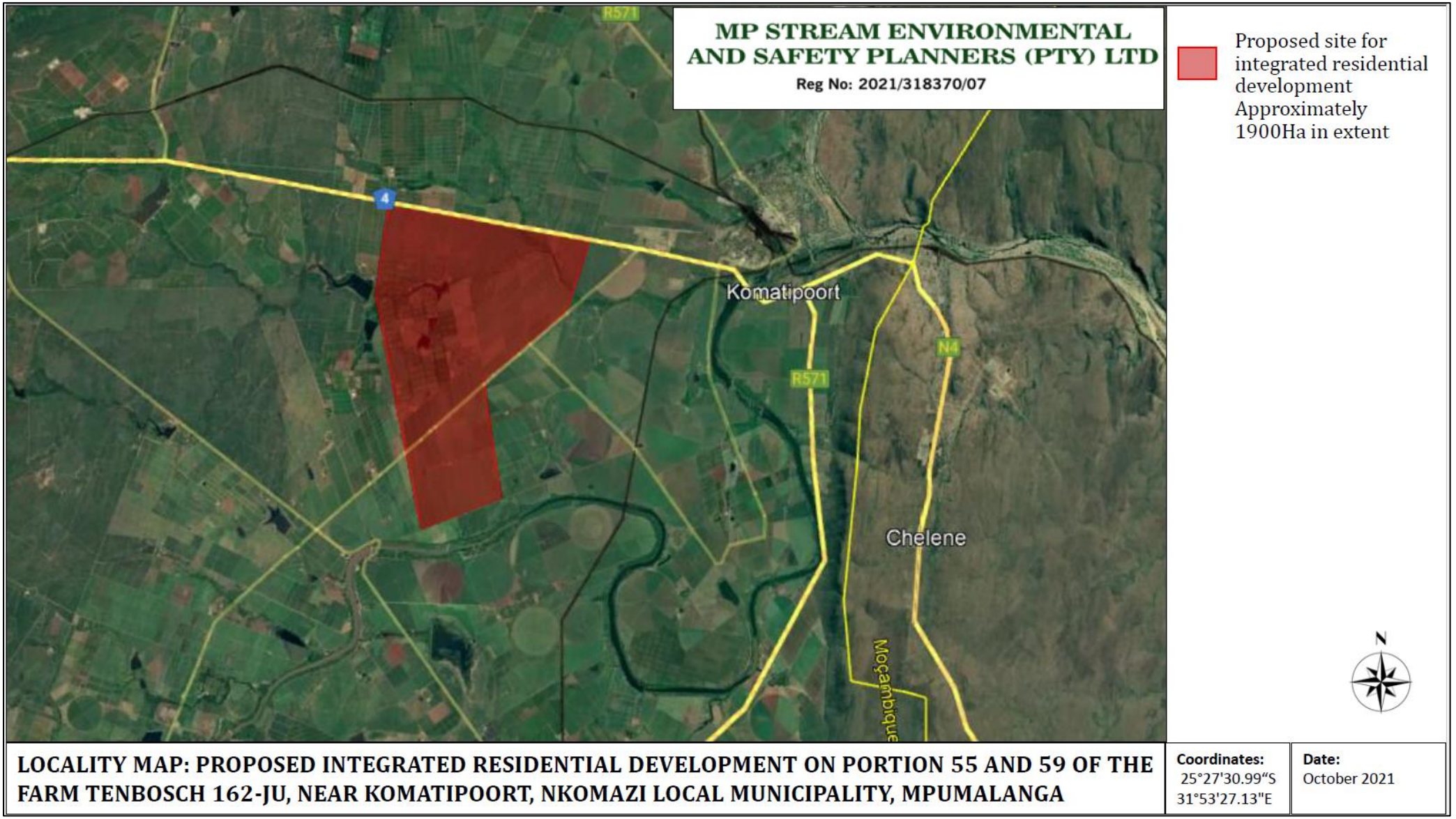

FIGURE 1: LOCALITY MAP PROPOSED SMART CITY DEVELOPMENT, KOMATIPOORT, MPUMALANGA PROVINCE

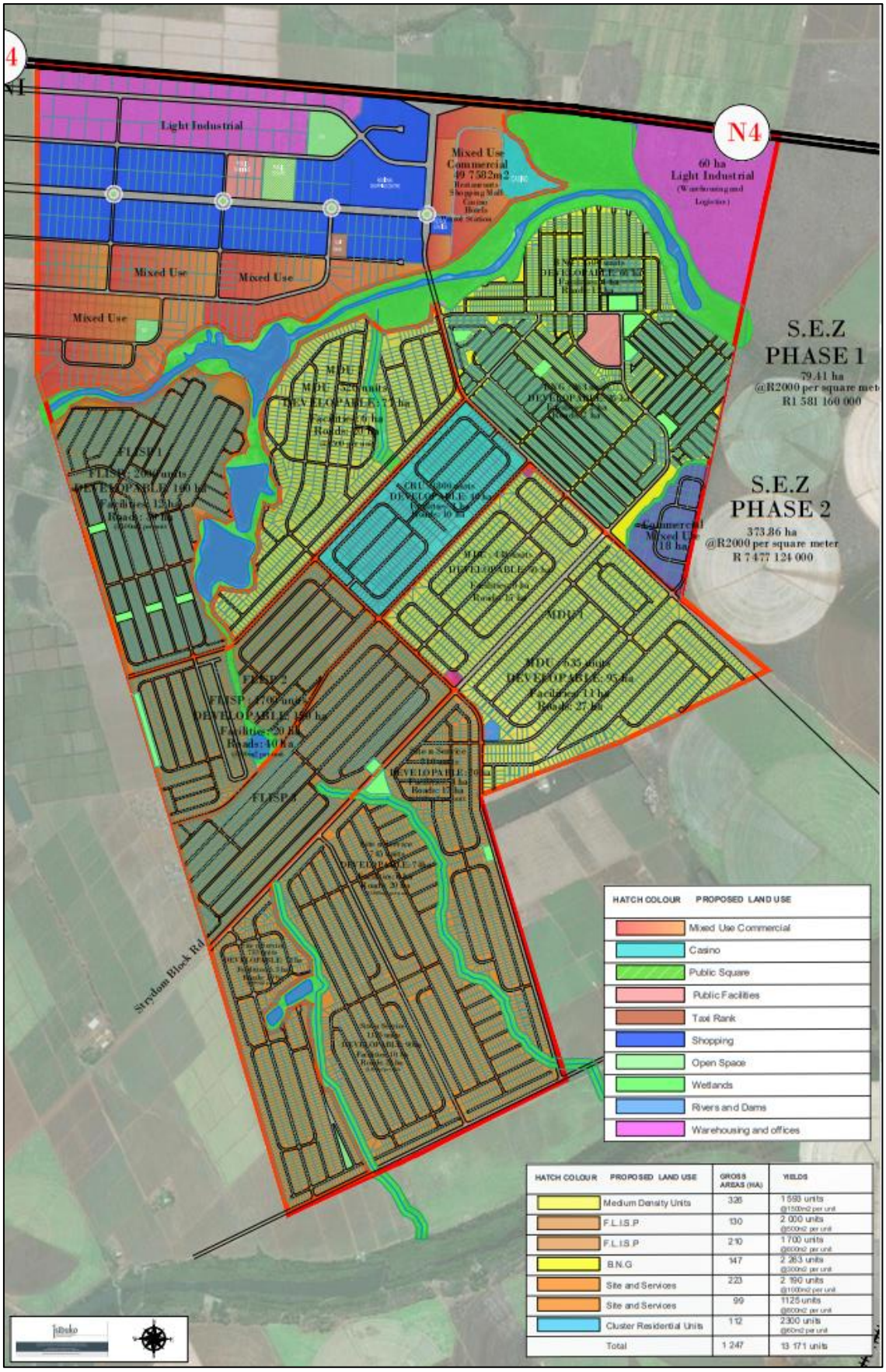

FIGURE 2: LAYOUT MAP- PROPOSED SMART CITY DEVELOPMENT, KOMATIPOORT, MPUMALANGA PROVINCE

1.3 Policy Legal and Administrative Framework

TABLE 1: POLICY LEGAL AND ADMINISTRATIVE FRAMEWORK

Applicable legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments considered	Project application and type (permit / licence / authorisation / comment)
The Constitution of South Africa, Act No. 108 of 1996	**Department of Human Settlement** will be required to adhere to the Environmental Management Programme (EMPr) requirements to ensure that social and environmental management considerations are considered and implemented. As per Section 25 the Constitution, a public participation process (PPP) will be undertaken, as this is an essential mechanism for informing stakeholders of their rights and obligations in terms of the project.
National Environmental Management Act, 1998 (Act No. 107 of 1998)	Environmental Authorisation will subsequently be applied for by means of conducting a Scoping and Environmental Impact Assessment process as regulated within GNR982 of 2014 (as amended in 2017).
National Biodiversity Act, 2004 (Act No. 10 of 2004)	The act provides for the management and conservation of South Africa's biodiversity within the framework of the National Environmental Management Act, 1998; the protection of species and ecosystems that warrant national protection; the sustainable use of indigenous biological resources, the fair and equitable sharing of benefits arising from bioprospecting involving indigenous biological resource; the establishment and functions of a South African National Biodiversity Institute; and for matters connected therewith. The National Biodiversity Act, 2004, must therefore be considered prior to the clearance of vegetation to minimise the impact on the terrestrial biodiversity.

Occupational Health and Safety Act, 1998 (Act No. 85 of 1998)	The Act provides for the health and safety of people at work and for the health and safety of people using plant and machinery. During establishment, work must be conducted with strict adherence to the Occupational Health and Safety Act 85 of 1998.
National Heritage Resources Act, 1999 (Act No 25 of 1999)	This legislation aims to promote good management of the national estate, and to enable and encourage communities to nurture and conserve their legacy so that it may be bequeathed to future generations. According to the South Africa Heritage Resource Act No 25 of 1999, a Heritage Impact Assessment must be conducted when an area larger than 5000m^2 is proposed to be transformed. A Heritage Specialist has therefore been appointed and the assessment and findings will also form part of the Environmental Impact Assessment investigation.
Nkomazi Local Municipality Integrated Development Plan (IDP).	The primary objectives of the IDP are to foster economic growth that creates jobs and improve infrastructure within the province. Job opportunities will be created by the proposed agricultural activities which supports economic growth within the area. The Kruger National Park has influenced the spatial form of the local municipality and dictates the type of land uses to be found adjacent to its border, including agriculture and tourism related developments. Tourism has been identified as one of the five key pillars for economic development within the municipality.

1.4 National Environmental Management Act 107 of 1998

In accordance with the National Environmental Management Act 107, of 1998, the following listed activities will be triggered by the proposed development and will require approval prior to commencement:

GNR 983, 2014 (as amended), Activity 9:

The development of infrastructure exceeding 1 000m in length for the bulk transportation of water or storm water –

(i) With an internal diameter of 0.36m or more; or

(ii) With a peak throughput of 120 litres per second or more;

GNR 983, 2014 (as amended), Activity 10:

The development and related operation of infrastructure exceeding 1 000m in length for the bulk transportation of sewage, effluent, process water, waste water, return water industrial discharge or slimes –

(i) With an internal diameter of 0.36m or more; or

(ii) With a peak throughput of 120 litres per second or more;

GNR 983, 2014 (as amended), Activity 12:

The development of (ii) infrastructure or structures with a physical footprint of 100m^2 or more, where such development occurs (i) within a watercourse.

GNR 983, 2014 (as amended), Activity 19:

The infilling or depositing or any material or more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from (i) a watercourse.

GNR 984, 2014 (as amended), Activity 15:

The clearance of an area of 20 hectares or more of indigenous vegetation.

GNR 985, 2014 (as amended), Activity 4:

The development of a road wider than 4 metres with a reserve less than 13,5m within (f) Mpumalanga, (gg) areas within 10km from national parks or world heritage sites or 5 km from any other protected area identified in terms of NEMPAA.

GNR 985, 2014 (as amended), Activity 10:

The development and related operation of facilities or infrastructure for the storage, or storage and handling of a dangerous good where such storage occurs in containers with a combined capacity of 30 but not exceeding 80 cubic metres, within (f) Mpumalanga, (gg) areas within 10km from national parks or world heritage sites or 5 km from any other protected area identified in terms of NEMPAA.

GNR 985, 2014 (as amended), Activity 14:

The development of (ii) infrastructure or structures with a physical footprint of 10 square metres or more, where such development occurs (a) within a watercourse, (f) within Mpumalanga, (hh) areas within 10km from national parks or world heritage sites or 5 km from any other protected area identified in terms of NEMPAA.

With the information available during this stage of the project, the above listed activities will be included within the application for Environmental Authorisation. Other listed activities might also be

triggered and applied for during the Environmental Authorisation process, however, it is unlikely that the process to be conducted, would be impacted by the additional listed activities to be applied for.

According to the triggered activities, the Applicant is required to conduct a Scoping and Environmental Impact Assessment (Scoping and EIA) for the activities proposed.

1.5 National Water Act 36 of 1998

Various watercourses (wetland areas and drainage lines) occur within the proposed project site and any activity within or within a close proximity to these watercourses will require approval from the Department of Water and Sanitation, in accordance with Section 21 of the National Water Act 36 of 1998.

With the information available during this stage of the project, a water use license application will be required for the following water use activities as per Section 21 of the NWA 36, 1998:

- Section 21 (c) - impeding or diverting the flow of water in a watercourse; and
- Section 21 (i) – altering the bed, banks, course or characteristics of a watercourse.

At this stage of the project, it is uncertain where water will be sourced from and how sewage will be treated. Depending on what is proposed, a Water Use License might also be required for these activities.

1.6 Scoping Phase

The objective of a scoping phase is to, through a consultative process:

(a) Identify the relevant policies and legislation relevant to the activity;
(b) Motivate the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location;
(c) Identify and confirm the preferred activity and technology alternative through an impact and risk assessment and ranking process;
(d) Identify and confirm the preferred site through a detailed site selection process, which includes an impact and risk assessment process inclusive of cumulative impacts and a ranking process of all the identified alternatives focussing on the geographical, physical, biological, social, economic and cultural aspects of the environment;
(e) Identify the key issues to be addressed in the assessment phase;
(f) Agree on the level of assessment to be undertaken, including the methodology to be applied, the expertise required as well as the extent of further consultation to be undertaken to determine the impacts and risks and activity will impose on the preferred site through the life of the activity, including the nature, significance, consequence, extent, duration and probability of the impact to inform the location of the development footprint within the preferred site; and
(g) Identify suitable measures to avoid, manage or mitigate identified impacts and to determine the extent of the residual risks that need to be manged and monitored

1.7 EIA Phase

The objective of the environmental impact assessment process is to, through a consultative process –

(a) Determine the policy and legislative context within which the activity is located and document how the proposed activity complies with and responds to the policy and legislative context;
(b) Describe the need and desirability of the proposed activity, including the need and desirability of the proposed activity in the context of the preferred location;
(c) Identify the location of the development footprint within the preferred site based on an impact and risk assessment process inclusive of cumulative impacts and a ranking process of all the identified development footprint alternatives focusing on the geographical, physical, biological, social, economic and cultural aspects of the environment;
(d) Determine the –
    i. Nature, significance, consequence, extent, duration and probability of the impacts occurring to inform identified preferred alternatives;
    ii. Degree to which these impacts –
        1. can be reversed;
        2. may cause irreplaceable loss of resources, and
        3. can be avoided, managed or mitigated;
(e) identify the most ideal location for the activity within the preferred site based on the lowest level of environmental sensitivity identified during the assessment;
(f) identify, assess and rank the impact the activity will impose on the preferred location through the life of the activity;
(g) identify suitable measures to avoid, manage or mitigate identified impact; and
(h) identify residual risks that need to be managed and monitored

1.8 Description of the project

The Department of Human Settlement is proposing to clear approximately 1 900 hectares for the development of an integrated residential area on portion 55 and 59 of the farm Tenbosch 162 JU, near Komatipoort, Mpumalanga Province.

The following land uses are proposed within the proposed development:

- Mixed Use Commercial;
- Casino;
- Public Square;
- Public Facilities;
- Taxi Rank;
- Shopping;
- Open Space;
- Warehousing and offices; and
- Residential;

Water and sanitation services are to be provided by the Nkomazi Local Municipality, however, confirmation from the municipality is required on whether they are able supply the necessary capacity. This will be confirmed during the EIA process.

There are various drainage lines and wetlands within the proposed project area and as stated within the National Water Act 36 of 1998 (NWA 36, 1998), any activity taking place within any identified watercourse, must be authorized. Therefore, any bridges, or proposed culvert structures, must be authorized by the Inkomati-Usuthu Catchment Management Agency (IUCMA).

1.9 Need and Desirability

According to census 2001 the population size was 334 668 and in 2011 it was 393 030. The Population of Nkomazi grew by 58362 between 2001 and 2011 and the average population growth rate was 1.61% per annum.

The unemployment rates decreased from 2001 to 2011 but are still high. Education is not only one of the main factors that contribute to unemployment but is a key indicator of development in general. Nkomazi Local Municipality is facing high rates of unemployment due to the fact that the municipality is a rural municipality which mainly focuses on agriculture for job creation.

Both the high level of unemployment and the high household dependency ratio leads to an increased number of communities living in abject poverty. Current welfare systems and packages are unsustainable and the Municipality is compelled to direct more resources towards supporting its citizens. A strategic approach by the Municipality should be encouraged to ensure that more job opportunities are made available, economic development programmes are enhanced and basic services are provided to uplift citizens out of poverty. (Nkomazi Local Municipality Integrated development plan 2018-2022).

The Department of Trade and Industry recently introduced its Special Economic Zones (SEZ) Policy, which the President enacted into law. The premise is that the act and policy will transform regional industrial development in South Africa. The Nkomazi Special Economic Zone is the axis of economic integration between the South African provinces of Mpumalanga, Gauteng and Limpopo and the independent states of Swaziland and Mozambique. An Environmental Impact Assessment (EIA) was recently undertaken for the Nkomazi SEZ which is strategically positioned in the border town of Komaptipoort, and directly adjacent to the new proposed integrated residential development which is currently being assessed. The Nkomazi SEZ will include industries within the following sectors:

- Logistics and transport;
- Minerals and Energy;
- Agro-processing; and
- Automotive.

It is projected that the Nkomazi SEZ will result in approximately 1 394 direct and indirect job opportunities within the first year, and an additional 985 job opportunities over the course of the first three years of construction, and approximately 707 job opportunities from the fourth year onwards. (http://www.mega.gov.za/nkomazi-special-economic-zone/)

The South African Constitution (RSA, 1996: 11), in chapter 2 section 26, states that everyone has the right to access adequate housing. It is the responsibility of the National Department of Human Settlements (NDoHS) to ensure that this right is honoured and adhered to. The country's ever-increasing population and a limited supply of land within the urban core have resulted in a decline in the delivery of affordable housing. The increase in job opportunities as a result of the Nkomazi SEZ,

will result in a shortage of housing within the area and therefore the proposed integrated residential development will not only provide adequate housing to the growing community, but also ensure that business and industrial sectors grow to fulfil the needs of the growing community.

2. PUBLIC PARTICIPATION PROCESS

The purpose of this chapter is to provide an outline of the public participation process (PPP) to date and the way forward with respect to the Environmental Impact Assessment process.

Consultation with the public forms an integral component of the EA process. This process enables Interested and Affected Parties (I&APs) (e.g. directly affected landowners, national-, provincial- and local authorities, and local communities etc.) to raise their issues and concerns regarding the proposed activities, which they feel should be addressed in the BA process. The PPP has thus been structured such as to provide I&APs with an opportunity to gain more knowledge about the proposed project, to provide input through the review of documents/reports, and to voice any issues or concerns at various stages throughout the EA process.

I&APs were identified during the public participation phase of the project. All the parties identified as an I&AP (surrounding landowners, relevant departments, stakeholders, local and district authorities) have automatically been registered in the I&APs database for the project. The registered I&AP list is attached as **Annexure C.1.**

In effort to engage potential stakeholders, different communication methods were used to inform them about the project and how to get involved in the EA process. These methods include:

- Distributing English Background Information Documents (BIDs) to all registered I&APs,22 October 2021, proof of which is attached in **Annexure C.2**;
- Placement of media advert in a local newspaper (The Lowvelder) on 21 October (see **Annexure C.3**).
- Placing of a notice at the proposed site took place on 15 October 2021 (see **Annexure C.4**);

To date, the following comments have been received:

Interested and Affected Party / Organ of State	Comment	Response
Mr PK Mathekgana **Director: Ilima**	Comments on BID: 1. We refer to the above matter, and your notice of an application for environmental authorisation process purportedly issued in terms of the Environmental Impact Assessment Regulations of 2014 (the "EIA Regulations"). 2. We hereby lodge our interest as an interested and affected party herein in accordance with chapter 6 of the EIA Regulations.	Response from EAP: Thank you for the comments received regarding the proposed development. Your comments will be discussed with the client and a meeting will be arranged to provide clarification.

	3. Our interest, and objection, in this matter is that we have a valid lease agreement wherein we have leased portions 55 and 59 of the Farm Tenbosch 162-JU, Mpumalanga from the Bambanani Mlambo Trust, in order for us to perform farming activities thereon. 4. Accordingly, no one has obtained any consent from us, as the person in control of the land, in accordance with regulation 39 (1) of the EIA Regulations before applying to perform an environmental authorisation in respect of the proposed development. Further, no one has obtained any consent from us, as the person in control of the land, to conduct the proposed development which is clearly against the farming activities we are entitled to conduct on the land in accordance with our lease agreement with the Bambanani Mlambo Trust. 5. Our rights herein remain strictly reserved.	

3. CONSIDERATION OF ALTERNATIVES

The EIA process requires the developer to identify and investigate/assess feasible and reasonable alternatives. The project alternatives range from the location where the activity is proposed, type of activity to be undertaken, design the of activity, technology to be used in the activity to the option of not implementing the activity (No-Go Alternative).

The assessment of the alternatives is a complicated and multi-faceted issue, which is essential to the success of this application and ultimately to the proper, responsible, and sustainable operation of the proposed project.

3.1 Alternative Selection

3.1.1 Location Alternatives

As described in the need and desirability (Section 1.9), an Environmental Impact Assessment was recently undertaken and approved for the Nkomazi Spatial Economic Zone (SEZ) which is proposed to be located directly adjacent to the site currently proposed for the integrated residential development. The Department of Human Settlements must therefore make provisions for the growing community which will flock to Komatipoort for the additional job opportunities which would be provided. It is therefore imperative that the proposed residential development is located within a close proximity to the approved Nkomazi SEZ and that the area is large enough to accommodate the additional proposed residential, business and light industrial facilities. As portion 55 and 59 of the farm Tenbosch 162-JU is directly adjacent to the proposed Nkomazi SEZ and the property is owned by the Department of Human Settlements, the area was found to be the most suitable as it is large enough to accommodate the additional facilities.

3.1.2 Layout Alternatives

An Ecological Assessment, Aquatic Assessment and Heritage Impact Assessment is currently in the process of being undertaken as part of the Environmental Impact Assessment process, to identify any environmental and/or cultural sensitivities within the project area. In addition to this, a Geotechnical Assessment is underway to determine the suitability of the geology and soil of the proposed area for the proposed development. Other studies which will inform the layout of the proposed development includes the flood line determination, the traffic impact assessment and services report. The proposed layout will therefore be amended once the sensitivities have been identified in order to ensure that all environmental and cultural sensitivities are protected from the proposed development.

3.1.3 No-Go Alternatives

The no-go alternative would be to not authorise the application for the development of an integrated residential area. Should this alternative be favourable, the project area will not be cleared and used for development, however, once the Nkomazi SEZ is operational, the town of Komatipoort as well as surrounding areas, will not be able to accommodate the additional people flocking to the town for job opportunities. The impact of not constructing the integrated residential area will therefore be highly negative.

4.DESCRIPTION OF THE AFFECTED ENVIRONMENT

The description of the affected environment below draws on existing knowledge from published data, previous studies, specialist investigations, site visits to the area and is used to understand the possible effects of the proposed project on the environment.

4.1 Topography

The study area is located within the Tshokwane- Hlane Basalt Lowveld Bioregion. The topography of the proposed project area is approximately 155 to 216 meters above mean sea level; however, the area is mostly flat and fit for development.

4.2 Climate

Mpumalanga is a province where the climate varies due to is topography. The proposed project area is located on the Lowveld Region and has a tropical climate with warm sub-tropical temperatures and experiences high summer rainfalls. The study area experiences a humid and hot weather during summer seasons. The climatic trends of the area suggest summer season precipitation and dryer periods during winter. The area receives a total of about 800-1000 mm of rain over 12 months.

4.3 Ecology

Terrestrial Ecology: The study area is classified as Lowveld (A10), according to Acocks (1988). The project area falls within the Savannah Biome. The Savanna Biome is the largest Biome in southern Africa, occupying 46% of its area, and over one-third the area of South Africa. It is well developed over the lowveld and Kalahari region of South Africa. It is characterized by a grassy ground layer and a distinct upper layer of woody plants. The vegetation type is classified as the Tshokwane- Hlane Basalt Lowveld.

This vegetation type is restricted to a strip running parallel to the Lebombo Mountains from central Swaziland in the south to the Olifants River in the north. Tshokwane - Hlane Basalt Lowveld originally covered 281 929 Ha in Mpumalanga, of which 12.1 % has been transformed, mostly through sugarcane and settlements. This vegetation type is considered well protected and has a conservation status of Least Concern (Lötter et al., 2014). This is largely due to much of this community occurring within the Kruger National Park. It is therefore not listed as a Threatened Ecosystem (Notice 1002 of Government Gazette 34809, 9 December 2011).

According to the Mpumalanga Biodiversity Sector Plan, 2014, most of the terrestrial ecosystems within the study area, is classified as Heavily or Moderately Modified Areas. The scattered untransformed sections are classified as Other Natural Areas.

Other Natural Areas refer to areas that have not been identified as a priority in the current systematic biodiversity plan but retain most of their natural character, while performing a range of biodiversity and ecological functions. Other Natural Areas offer much more flexibility in terms of permissible land uses, but the desired management objective should be to minimise habitat and species loss and ensure ecosystem functionality through strategic landscape planning.

The entire study area is also situated within the Ecological Support Areas (ESA): Protected Area Buffers. ESA's are "areas that are not essential for meeting (conservation) targets, but play an

important role in supporting the functioning of CBA's and that deliver important ecosystem services" (Lötter et al., 2014). Protected Area Buffers are areas that surround proclaimed protected areas that moderate the negative impacts of land-uses that may affect the ecological functioning of those protected areas

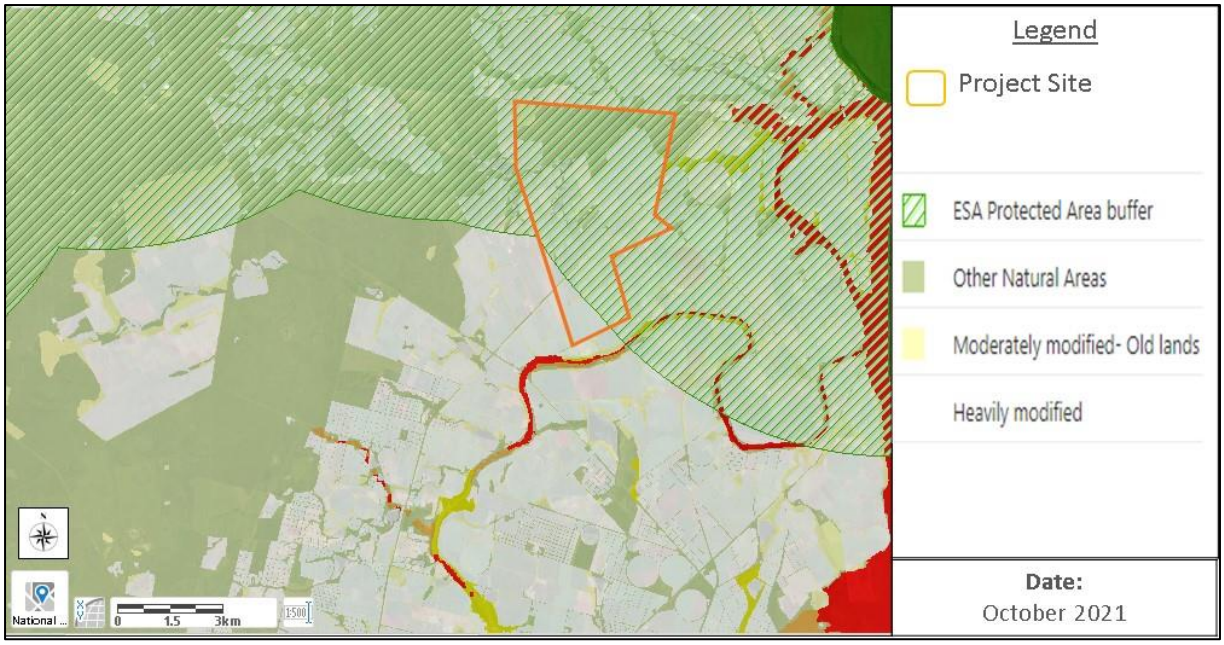

FIGURE 3: TERRESTRIAL ECOLOGY ACCORDING TO THE MPUMALANGA BIODIVERSITY SECTOR PLAN, 2014

Freshwater Ecology:

According to the Mpumalanga Biodiversity Sector Plan, 2014, Most of the freshwater ecosystems within the study area is classified as heavily modified and other natural areas. The wetland area running through the southern part in the study area is classified as ESA: Important Sub catchment.

The MTPA requirements for an Ecological Support Area (important sub catchment) are quoted as follows: This sub-category includes National Freshwater Ecosystems Priority Areas (FEPA) sub catchments and Fish Support Areas. A river FEPA is the river reach that is required for meeting biodiversity targets for river ecosystems and threatened fish species. In managing the condition of a river FEPA, it is important to manage not only the river itself, but also the network of streams and wetlands as well as land-based activities in the sub-catchment that supports the river FEPA. A proportion of tributaries and wetlands need to remain healthy and functional in order for the river FEPA to be kept in a good ecological condition. This requires that management activities are focused on maintaining water quantity and quality and the integrity of natural habitat in the sub-catchment.

An Ecological Assessment is currently being undertaken and will form part of the Environmental Impact Assessment Report.

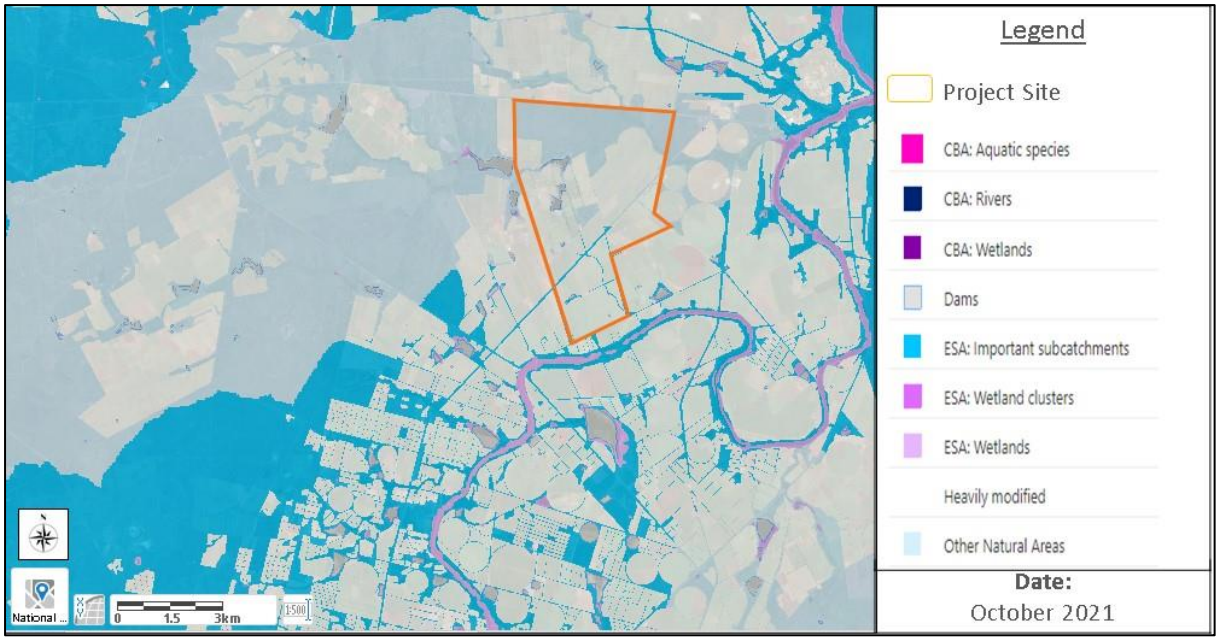

FIGURE 4: FRESHWATER ECOLOGY ACCORDING TO THE MPUMALANGA BIODIVERSITY SECTOR PLAN, 2014

4.4 Surface and Groundwater

Groundwater usually occurs within fractured secondary aquifers along sedimentary or sedimentary/igneous rock contacts.

Regional drainage is in a general north easterly to northerly direction. Generally, groundwater elevations mimic surface topography, and groundwater flows from higher lying ground towards lower lying springs or valleys.

A Wetland Delineation and Aquatic Assessment is currently being undertaken and will form part of the Environmental Impact Assessment Report.

4.5 Land Use

The proposed development is situated on Portion 55 and 59 of the farm Tenbosch 162 JU, approximately 5 km west of the town of Komatipoort, Ehlanzeni District, Mpumalanga. The study area is approximately 6 km south of the Kruger National Park boundary.

Surrounding land uses include agricultural, commercial and residential developments, however, the site proposed for the Nkomazi Special Economic Zone (SEZ) is situated directly adjacent and west of the proposed site for the integrated residential development. The main focus of the proposed Nkomazi SEZ is Agro-processing, nutraceuticals as well as logistics. The Nkomazi SEZ obtained Environmental Authorisation and is still awaiting the Water Use License from the Department of Water and Sanitation.

According to the Department of Environmental Affairs' Screening tool the project area also falls within the Strategic Gas pipeline corridor- Phase 8: Rompco Pipeline Corridor.

4.6 Geology and Soil

Based on the published 1:250 000 Geological map the study area is underlain by transported sandy and gravelly soils overlying basalt bedrock belonging to the Letaba Formation, Lebombo Group, Karoo Supergroup. A Geo-technical Assessment will be undertaken to inform the geological suitability of the proposed site.

4.7 Heritage

A Heritage Impact Assessment will be conducted to determine whether the transformation of the proposed land will have any impact on heritage resources or artefacts.

The findings of this study will be included within the Environmental Impact Assessment Report.

4.8 Socio-Economic Environment

The Nkomazi Local Municipality is located in the eastern part of the Ehlanzeni District Municipality of the Mpumalanga Province. The municipality is strategically placed between Swaziland (North of Swaziland) and Mozambique (east of Mozambique). It is linked with Swaziland by two provincial roads the R570 and R571 and with Mozambique by a railway line and the main national road (N4), which forms the Maputo Corridor.

The larger portion of the 410 907 individuals within the Nkomazi Local Municipality, lives in peri-urban and rural areas. Nkomazi Local Municipality currently has a high level of unemployment and a high household dependency. The levels of skill and qualifications of the population is fairly low which is problematic for future economic development. The socio-economic context of the surrounding environment can therefore be described as a community with a low percentage of education and high unemployment rate

5.SITE PHOTOS

FIGURE 5: ENTRANCE GATE AT STRYDOM BLOCK ROAD

FIGURE 6: SUGARCANE PLANTATION NORTHERN SECTION OF STUDY AREA

FIGURE 7: STORING FACILITIES

FIGURE 8: GRAVEL ROAD TOWARDS OFFICES

FIGURE 9: SOUTHERN SECTION OF STUDY AREA

FIGURE 10: WETLAND IN THE SOUTHWESTERN SECTION OF STUDY AREA

FIGURE 11: HARVESTED SUGARCANE IN THE SOUTHERN

FIGURE 12: SMALL VILLAGE CONSISTING OF FARM WORKERS AND FAMILIES LOCATED ON THE STUDY AREA

FIGURE 13: NATURAL VEGETATION ON THE MOST NORTHERN SECTION OF THE STUDY AREA ALONG THE N4 HIGHWAY

6.METHODOLOGY OF ASSESSING THE SIGNIFICANCE OF IMPACTS

This section outlines the method used for assessing the significance of the potential environmental impacts during the construction/establishment, operational and decommissioning phases.

For each impact, the EXTENT (spatial scale), MAGNITUDE and DURATION (time scale) would be described, as shown in **Table** 2:Assessment criteria for the evaluation of impacts **2**. These criteria are then used to determine the SIGNIFICANCE of the impact, firstly in the case of no mitigation and then with the most effective mitigation measure(s) in place. The mitigation described in the Report represents the full range of plausible and pragmatic measures but does not necessarily imply that they would be implemented.

The following tables show the scale used to assess these variables and defines each of the rating categories.

TABLE 2:ASSESSMENT CRITERIA FOR THE EVALUATION OF IMPACTS

Criteria	Category	Description
Extent or spatial influence of impact	**Regional**	Beyond a 30km radius of the candidate site.
	Local	Within a 30km radius of the candidate site.
	Site-specific	On site or within 100 m of the candidate site.
Magnitude of impact (at the indicated spatial scale)	**High**	Natural and/ or social functions and/ or processes are *severely* altered
	Medium	Natural and/ or social functions and/ or processes are *notably* altered
	Low	Natural and/ or social functions and/ or processes are *slightly* altered
	Very low	Natural and/ or social functions and/ or processes are *negligibly* altered
	Zero	Natural and/ or social functions and/ or processes remain *unaltered*
Duration of impact	**Long-term**	More than 10 years after construction
	Medium-term	Up to 5 years after construction
	Construction-term	Up to 3 years

The SIGNIFICANCE of an impact is derived by taking into account magnitude, duration and extent of each impact. The criteria employed in arriving at the different significance ratings is shown in **Error! Reference source not found.**3.

TABLE 3: DEFINITION OF SIGNIFICANCE RATING

Significance ratings	Level of criteria required
High	• High magnitude with a regional extent and long-term duration • High magnitude with either a regional extent and medium-term duration or a local extent and long-term duration • Medium magnitude with a regional extent and long-term duration
Medium	• High magnitude with a local extent and medium-term duration • High magnitude with a regional extent and construction period or a site-specific extent and long-term duration • High magnitude with either a local extent and construction period duration or a site-specific extent and medium-term duration • Medium magnitude with any combination of extent and duration except site specific and construction period or regional and long term • Low magnitude with a regional extent and long-term duration
Low	• High magnitude with a site-specific extent and construction period duration • Medium magnitude with a site-specific extent and construction period duration • Low magnitude with any combination of extent and duration except site specific and construction period or regional and long term • Very low magnitude with a regional extent and long-term duration
Very low	• Low magnitude with a site-specific extent and construction period duration • Very low magnitude with any combination of extent and duration except regional and long term
Neutral	• Zero magnitude with any combination of extent and duration

Once the significance of an impact has been determined, the **PROBABILITY** and **CONFIDENCE** of this impact are determined using the rating systems outlined in **Error! Reference source not found. 4** and **Table 5.** The significance of an impact should always be considered in concert with the probability of that impact occurring. Lastly, the **REVERSIBILITY** of the impact is estimated using the rating system outlined in **Error! Reference source not found. 6.**

TABLE 4: DEFINITION OF PROBABILITY RATINGS

Probability ratings	Criteria
Definite	Estimated greater than 95 % chance of the impact occurring.
Probable	Estimated 5 to 95 % chance of the impact occurring.
Unlikely	Estimated less than 5 % chance of the impact occurring.

TABLE 5: DEFINITION OF CONFIDENCE RATINGS

Confidence ratings	Criteria
Certain	Wealth of information on and sound understanding of the environmental factors potentially influencing the impact.
Sure	Reasonable amount of useful information on and relatively sound understanding of the environmental factors potentially influencing the impact.
Unsure	Limited useful information on and understanding of the environmental factors potentially influencing this impact.

TABLE 6:DEFINITION OF REVERSIBILITY RATINGS

Reversibility ratings	Criteria
Irreversible	The activity will lead to an impact that is in all practical terms permanent.
Reversible	The impact is reversible within 2 years after the cause of the impact is removed.

7.IMPACTS AND RISKS

Within this section, the impacts and risks to be assessed during the Environmental Impact Assessment Phase, is identified. The table below identifies all aspects to be assessed during the EIA phase of the project:

TABLE 7: IMPACTS AND RISKS TO BE ASSESSED

	Impact / Risk	Nature	Extent	Duration	Probability	Significance	Degree to which impact:		
							Can be reversed	**May cause irreplaceable loss of resources**	**Can be avoided, managed or mitigated**
Alternative 1 (Preferred alternative)									
Site Clearance and construction activities	Floral habitat and diversity. Impact through vegetation clearance	Medium - negative	Site-specific	Long-term	Definite	Medium (-)	Unlikely	Probable	Yes – Sensitive areas will be demarcated
	Fragmentation and destruction of habitats	High - negative	Local	Long term	Highly Probable	Medium (-)	Unlikely	Probable	No – permanent impact on habitat
	Increase in establishment of alien invasive plant species	Medium - negative	Site-specific	Long-term	Probable	Medium (-)	Yes	Improbable	Yes - mitigated

	Soil erosion and storm water management	High - negative	Site specific	Short term	Probable	Medium	Yes	Improbable	Yes - mitigated
	Dust generation	Moderate - negative	Site-specific	Short-term	Probable	Low (-)	Yes	Improbable	Yes – managed and mitigated
	Contribute to climate change and non-renewable resource use	Medium - negative	National	Medium-term	Improbable	Low (-)	Mostly	Probable	Yes –managed, and mitigated
	Soil contamination - by hydrocarbon spillages	Moderate - negative	Site-specific	Short-term	Probable	Low (-)	Yes	Improbable	Yes – avoided
	Surface and groundwater pollution	High-negative	Site Specific	Short-term	Probable	Medium (-)	Yes	Improbable	Yes- avoided
	Impact Heritage sites	Medium - negative	Site Specific	Long-term	Unlikely	High (-)	No	Improbable	Yes – sensitive areas will be demarcated
	Increase in traffic	Medium - negative	Local	Short-term	Likely	Medium (-)	Yes	Improbable	Yes – managed and mitigated
	Visual Impact	Medium - negative	Site specific	Short - term	Likely	Medium (-)	Yes	Improbable	Yes, mitigated and managed
	Loss of agricultural potential	High - negative	Site specific	Long-term	Definite	High (-)	Unlikely	Improbalbe	Yes – should the development be decommissioned, soil can be treated to be used for agriculture, however, this will be unlikely.

Operational activities (activities associated with Residential area)	Increase in establishment of alien invasive plant species	Medium - negative	Site specific	Long term	Probable	Medium (-)	Yes	Probable	Yes – managed and mitigated
	Ground and surface water pollution	High - negative	Local	Long-term	Probable	High (-)	Yes	Improbable	Yes – avoided
	Soil contamination	Moderate - negative	Site-specific	Short-term	Probable	Low (-)	Yes	Improbable	Yes – avoided, mitigated
	Waste disposal and sanitation	Moderate - negative	Local	Long-term	Probable	Medium (-)	Yes	Improbable	Yes – managed, mitigated
	Increase in traffic	High - negative	Local	Long-term	Definite	Medium (-)	Yes	Improbable	Yes – managed, mitigated
	Erosion and storm water management	Moderate - negative	Site-specific	Long term	Probable	Medium (-)	Yes	Probable	Yes, managed, mitigated
	Impact on climate change	Moderate - negative	Regional	Long-term	Probable	Medium (-)	Yes	Probable	No, if vegetation is removed and replcaed with structures and infrastructure, the impact cannot be avoided, but mitigation measures can however minimise the impact.
	Visual Impact	Medium - negative	Local	Long-term	Definite	Medium (-)	No	Improbable	Yes, can be mitigated to reduce the impact

	Impact Heritage sites	Medium - negative	Site Specific	Long-term	Unlikely	High (-)	No	Improbable	Yes – sensitive areas will be demarcated
	Impact on the livelihood of community	High - positive	Local	Long term	Definite	High (+)	Yes	Improbable	Yes – mitigated
No-go alternative									
Associated Impacts if Integrated Development is not approved	Socio-economic impact Loss of job opportunities	High - negative	Local	Long term	Definite	Neutral (no possible positive impact)	Yes	Improbable	Yes (if application is approved)

8.MITIGATION MEASURES

TABLE 8: MITIGATION MEASURES

Impact/Risk	Mitigation Measure	Level of residual Risk
Impact on floral habitat and diversity through removal of indigenous vegetation and spreading of alien vegetation	• Implement alien vegetation control; • Keep vegetation clearing to a to the development area and exclude any sensitivities from the proposed area; • Ensure that no fauna located on site are harmed;	Medium
Dust generation during clearance of vegetation and other construction activities within and adjacent to site	• Clearance of vegetation must be done in phases as per the construction programme; • Areas may not be disturbed and left for unattended for long periods of time; • Heavy moving vehicles and other vehicles must adhere to a speed limit of 40km/h;	Low
Surface and groundwater contamination	• Employee training and awareness; • Spillages of any potentially hazardous materials should be cleaned immediately to avoid contamination of runoff; • No hazardous materials may be stored within 100m from the edge of any watercourse; • Compaction of rock to establish the water crossing must be closely monitored and all machinery used must be in a good working condition; • Water abstraction must be regulated and monitored in accordance with the Water Use License issued;	Medium
Soil erosion due to areas disturbed and soil contamination caused by hydrocarbon spillages	• Employee training and awareness • Spillages of any potentially hazardous materials should be cleaned immediately to avoid contamination;	Low

	• Erosion abatement measures should be installed in areas prone to erosion	
Visual Impact	• During construction, the site must be kept tidy and should it be required, the the area must be fenced with shaded cloth to reduce the visual impact during the construction phase; • During operation, the development will be visable, however proper landscaping will be required to ensure that the development is aesthetically pleasing.	Medium
Waste generation and disposal, sanitations and water use	• Construction waste generated must be appropriately stored until it is disposed of at a registered waste disposal facility; • Suficient refuse bins must be provided on site to ensure that the site is kept clear from littering; • All hazardous waste must be stored separately and disposed of at a facility, registered to accommodate hazardous waste; • During construction, chemical toilets must be provided for construction staff and be cleaned on a daily basis. These toilets must be emptied regularly; • Potable waer must be supplied for construction workers; • Services such as water and sanitation during the operational phase, are to be confirmed during the EIA process.	High
Impact on Heritage Sites	• Avoid any disturbance with identified heritage sites within the perimeter of the site. All important heritage sites must be protected from any activity proposed to be conducted	Medium
Socio-economic impact	• As this proposed development is located adjacent to both the Eswatini as well as Mozambique border, it is imperative that the contractor makes use of local labour and products as far as	Medium

	possible during construction to reduce the possibility of social unrest.	

9.PLAN OF STUDY

This Plan of Study for Environmental Impact Assessment (PoS for EIA) has been compiled in terms of the content requirements listed in Appendix 2 to the EIA Regulations of 2014 (Government Notice No. R 982 of 2014) under the National Environmental Management Act (Act No. 107 of 1998) (NEMA). The detailed PoS is provided in Table 9.

TABLE 9: PLAN OF STUDY

Content as required by NEMA
A plan of study for undertaking the environmental impact assessment process to be undertaken, including:
(i) A description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity;
An Ecological Assessment, Aquatic Assessment and Heritage Impact Assessment is currently in the process of being undertaken as part of the Environmental Impact Assessment process, to identify any environmental and/or cultural sensitivities within the project area. In addition to this, a Geotechnical Assessment is underway to determine the suitability of the geology and soil of the proposed area for the proposed development. Other studies which will inform the layout of the proposed development includes the flood line determination, the traffic impact assessment and services report. The proposed layout will therefore be amended once the sensitivities have been identified in order to ensure that all environmental and cultural sensitivities are protected from the proposed development. The no-go alternative would be to not authorise the application for the development of an integrated residential area. Should this alternative be favourable, the project area will not be cleared and used for development, however, once the Nkomazi SEZ is operational, the town of Komatipoort as well as surrounding areas, will not be able to accommodate the additional people flocking to the town for job opportunities. The impact of not constructing the integrated residential area will therefore be highly negative. **The respective impacts of each of the alternatives will be assessed in detail in the Environmental Impact Assessment phase.**
(ii) A description of the aspects to be assessed as part of the environmental impact assessment process;
During the screening process various potential impacts on the biophysical and socio-economic environment were identified by the EAP. These include: • Impact on terrestrial biodiversity, comprising fauna and flora; • Impact on Aquatic Biodiversity • Impact on the nearby water resources (ground and surface water); • Impact on heritage resources • Visual impacts; • Impact on agricultural potential; • Impact on Traffic; • Impact on soil (pollution, erosion and stormwater); • Social impacts; • Noise impacts; • Impact on climate change; and • Dust impacts.

(iii) Aspects to be assessed by specialists;

An Ecological Assessment and Wetland Delineation will be conducted and will include the following:

- Assessment of the terrestrial ecology of the 1900 hectares proposed for integrated residential development;
- Delineating all wetlands within the proposed project site;
- Identifying the ecological sensitivity of the proposed area;
- Providing recommendations and mitigation measures for the development activities proposed;

A Heritage assessment will also be conducted by a Heritage Specialist to assess the following:

- Assessment of the 1900 hectares proposed for Integrated Residential Development;
- Identifying any possible heritage or archaeological sensitivities and providing recommendations with regards to the preservation of any possible findings

A Traffic Impact Assessment will also be undertaken to assess the following:

- Assess the impact on surrounding traffic flow and current road network to determine to which extent the road network should be upgraded.

A Geotechnical Assessment will be undertaken to determine the following:

- Determine whether the geology and soils are suitable for a development of this extent and to identify any sensitive areas which are not suitable for development.

A Flood Line Assessment to determine the following:

- Determine the 1:100 year flood line surrounding watercourses to ensure that no structures are in danger of any flood situation when construction is complete.

(iv) A description of the proposed method of assessing the environmental aspects, including aspects to be assessed by specialists;

The methodology used to assess the impacts is summarised below.

This section outlines the method used for assessing the significance of the potential environmental impacts during the construction/establishment, operational and decommissioning phases.

For each impact, the EXTENT (spatial scale), MAGNITUDE and DURATION (time scale) would be described, as shown in Table 2. These criteria are then used to determine the SIGNIFICANCE of the impact, firstly in the case of no mitigation and then with the most effective mitigation measure(s) in place. The mitigation described in the Report represents the full range of plausible and pragmatic measures but does not necessarily imply that they would be implemented.

The following tables show the scale used to assess these variables and defines each of the rating categories.

ASSESSMENT CRITERIA FOR THE EVALUATION OF IMPACTS

Criteria	Category	Description
Extent or spatial influence of impact	**Regional**	Beyond a 30km radius of the candidate site.
	Local	Within a 30km radius of the candidate site.
	Site-specific	On site or within 100 m of the candidate site.
Magnitude of impact (at the indicated spatial scale)	**High**	Natural and/ or social functions and/ or processes are *severely* altered
	Medium	Natural and/ or social functions and/ or processes are *notably* altered
	Low	Natural and/ or social functions and/ or processes are *slightly* altered
	Very low	Natural and/ or social functions and/ or processes are *negligibly* altered
	Zero	Natural and/ or social functions and/ or processes remain *unaltered*
Duration of impact	**Long-term**	More than 10 years after construction
	Medium-term	Up to 5 years after construction
	Construction-term	Up to 3 years

(v) A description of the proposed method of assessing duration and significance;

The SIGNIFICANCE of an impact is derived by taking into account magnitude, duration and extent of each impact. The criteria employed in arriving at the different significance ratings is shown in **Error! Reference source not found.**3.

DEFINITION OF SIGNIFICANCE RATINGS

Significance ratings	Level of criteria required
High	• High magnitude with a regional extent and long-term duration • High magnitude with either a regional extent and medium-term duration or a local extent and long-term duration • Medium magnitude with a regional extent and long-term duration
Medium	• High magnitude with a local extent and medium-term duration • High magnitude with a regional extent and construction period or a site-specific extent and long-term duration • High magnitude with either a local extent and construction period duration or a site-specific extent and medium-term duration • Medium magnitude with any combination of extent and duration except site specific and construction period or regional and long term • Low magnitude with a regional extent and long-term duration
Low	• High magnitude with a site-specific extent and construction period duration • Medium magnitude with a site-specific extent and construction period duration • Low magnitude with any combination of extent and duration except site specific and construction period or regional and long term • Very low magnitude with a regional extent and long-term duration
Very low	• Low magnitude with a site-specific extent and construction period duration • Very low magnitude with any combination of extent and duration except regional and long term
Neutral	• Zero magnitude with any combination of extent and duration

Once the significance of an impact has been determined, the PROBABILITY and CONFIDENCE of this impact are determined using the rating systems outlined in **Error! Reference source not found.** 4 and Table 5. The significance of an impact should always be considered in concert with the probability of that impact occurring. Lastly, the REVERSIBILITY of the impact is estimated using the rating system outlined in **Error! Reference source not found.** 6.

DEFINITION OF PROBABILITY RATINGS

Confidence ratings	Criteria
Certain	Wealth of information on and sound understanding of the environmental factors potentially influencing the impact.
Sure	Reasonable amount of useful information on and relatively sound understanding of the environmental factors potentially influencing the impact.
Unsure	Limited useful information on and understanding of the environmental factors potentially influencing this impact.

DEFINITION OF CONFIDENCE RATINGS

Probability ratings	Criteria
Definite	Estimated greater than 95 % chance of the impact occurring.
Probable	Estimated 5 to 95 % chance of the impact occurring.
Unlikely	Estimated less than 5 % chance of the impact occurring.

DEFINITION OF REVERSIBILITY RATINGS

Reversibility ratings	Criteria
Irreversible	The activity will lead to an impact that is in all practical terms permanent.
Reversible	The impact is reversible within 2 years after the cause of the impact is removed.

(vi) An indication of the stages at which the competent authority will be consulted;

Consultation with Competent Authority:

Comment on DSR: The MDARDLEA will be requested to provide comments on the Draft Scoping Report (DSR) in terms of Regulation 7(5) of GN R982 of 2014 (as amended in 2017), when the DSR is made available for public comment. This is to ensure that the Final Scoping Report (FSR) contains sufficient information for the MDARDLEA to make an informed decision and to ensure these reports satisfy the content requirements listed in the 2014 EIA Regulations. In terms of these regulations, the MDARDELA is required to submit comments within 30 days of the request for comment.

Once the 30-day PPP of the DSR has been completed, a Comment and Response Report (CRR) will be compiled and will incorporate any comments received and responses thereto. The DSR will be finalised, taking cognisance of any comments received. The FSR, including the CRR, will be submitted to the MDARDLEA for review. This CRR will be continuously updated throughout the project, until the Final EIR is submitted.

Comment and decision on FSR: In terms of Regulation 22 of GN R 982, the Competent Authority (DEA) must, within 43 days of receipt of the FSR, consider it, and in writing – Accept the report and advise the EAP to proceed with the tasks contemplated in the Plan of Study for EIA. Refuse Environmental Authorisation if the proposed activity is in conflict with a prohibition contained in legislation. Or if the Scoping Report does not substantially comply with the objectives and content requirements for scoping reports in terms of the 2014 EIA Regulations and the applicant cannot ensure compliance with these regulations within the prescribed timeframe.

Comment on Draft EIR: Should the FSR and Plan of Study for the EIA phase be accepted by the competent authority, the Draft EIR will be compiled. The MDARDLEA will be requested to provide comments on the Draft EIR in terms of Regulation 7(5) of GN R982 of 2014 (as amended in 2017) when it is made available for public comment. This is to ensure that the Final EIR contains sufficient information for the MDARDLEA to make an informed decision and to ensure these reports satisfy the content requirements listed in the 2014 EIA Regulations. The MDARDLEA will be required to submit comments within 30 days of the request for comment.

Comment and decision on the Final EIR: In terms of Regulation 24 of GN R982 (as amended in 2017), the MDARDLEA must within 107 days of receipt of the EIR and EMPr, in writing – Grant environmental authorisation in respect of all or part of the activity applied for. Or refuse environmental authorisation.

The above consultation opportunities with the MDARDLEA are based on the requirements of the EIA Regulations. However, additional consultation with the MDARDLEA may be required, depending on the outcome of the PPP.

(vii) Particulars of the public participation process that will be conducted during the environmental impact assessment process; and

In total three opportunities for public participation during the EIA process have been and will be provided, namely:

Initial comment period: Background Information Documents (BIDs) and notification letters were provided to affected and neighbouring landowners and other stakeholders. A site notice was placed on the site perimeter on 15 October 2021, and a newspaper advertisement was placed in the Lowvelder on 21 October 2021.

Scoping Phase comment period (30 days): The DSR will be released for comment for an official 30-day public comment period. I&APs will be given the opportunity to submit comments on the DSR and the Plan of Study for EIA. The DSR will be placed on MP Stream Environmental and Safety Planners website during this period.

EIA Phase comment period (30 days): Similar to the DSR, the Draft EIR will be subjected to a 30-day public comment period, during which all I&APs will be offered an opportunity to comment on the proposed project

Throughout the EIA process, I&APs have the opportunity to contact the EAP to discuss the project and raise any issues or concerns they might have.

(viii) A description of the tasks that will be undertaken as part of the environmental impact assessment process;

The following tasks are proposed to be undertaken during the EIA Process:

Appointment of specialists: Should additional specialist studies be required as a result of comments and information received from I&APs, organs of state, commenting authorities and/or the Competent Authority, the relevant specialists will be appointed to undertake these studies.

Compilation of Draft EIR: The compilation of the Draft EIR will take cognisance of any comments received from I&APs, organs of state, commenting authorities, and/or the Competent Authority during the Scoping Phase. The Draft EIR will incorporate these comments and the necessary changes will be made to the report, where applicable. The Draft EIR will also incorporate the findings from any additional specialist assessments undertaken.

All comments received during public comment period on the Draft EIR will be compiled into a CRR. Responses to comments received will also be included.

A Draft EMPr will incorporate mitigation measures identified and obtained during the Scoping and EIA Phases, with the proviso that non-feasible mitigation measures will be discussed but will be clearly identified as being non-feasible. The EMPr will be used to enforce the mitigation measures and ensure that the impacts of all phases of the proposed project are properly managed and addressed. The EMPr will meet all the requirements of Appendix 4 of GN R982 of 2014.

30-day PPP on the Draft EIR: As mentioned in (viii) above, the Draft EIR will be subjected to a 30-day public comment period, during which all registered I&APs will be offered an opportunity to comment on the proposed project.

Compilation of Final EIR for submission: The compilation of the Final EIR will take cognisance of any comments received from interested and affected parties, organs of state, commenting authorities, and/or the Competent Authority. The Final EIR will incorporate these comments and the necessary changes (if any) will be made to the report. All comments received will be compiled into a CRR.

The Draft EMPr will be finalised to include any comments received during the PPP and submitted to the Competent Authority for consideration and decision.

(ix) Identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored.

Suitable mitigation measures that can be adopted to reduce or avoid negative impacts and improve positive impacts for the project will be identified in detail during the EIA-phase. These mitigation measures will be included in the EIR and will be incorporated into the EMPr during the EIA Phase. Some high-level mitigation measures have been identified in the Scoping phase:

1. **Impact on Fauna and Flora**

It must be ensured that vegetation removal is restricted to the proposed development area. Operational activities shall be restricted to the development footprint. An alien and invasive vegetation control plan should be developed and implemented to inhibit alien plant establishment and proliferation. Vegetation removed may not be pushed into drainage lines or watercourses.

Care should be taken with the choice of herbicide to ensure that no additional impact and loss of indigenous plant species occurs due to the herbicide used; and footprint areas should be kept as small as possible when removing alien plant species. Should any protected plant species be encountered within the subject property in the future, the following should be ensured: ensure effective relocation of individuals to suitable offset areas; and all rescue and relocation plans should be overseen by a suitably qualified specialist. Ensure that operational related activities are kept strictly within the footprint area.

2. **Impact on Surface Water**

Any area where active erosion is observed must be immediately rehabilitated in such a way as to ensure that the hydrology of the area is re-instated to conditions which are as natural as possible. Ensure that operational activities do not affect watercourses on the site. Wetland areas must be protected, and a buffer area must be imposed on such areas. Water consumption are to be regulated as per the requirements of the Water Use License which will be applied for.

3. **Social Impacts**

Continue to recruit local labour and contractors as far as feasible. Employ labour-intensive methods where feasible.

4. **Visual Impacts**

The proposed development will be visible to road users and other adjacent property owners. It is therefore recommended that the site is kept tidy during the construction phase and shade cloth is used where required. During operation, it is imperative that the development is properly landscaped and large trees are planted to mitigate the visual impact and ensure that the area is aesthetically pleasing.

5. **Dust Impacts**

Dust will mostly be generated during the removal of vegetation and construction of the integrated residential area and therefore measures must be taken to reduce this impact during this phase of development.

6. **Impacts of Hazardous Substances**

The management and protection of the environment would be achieved through the implementation of the EMPr, which, specifies the storage details of hazardous compounds and the emergency procedures to follow in the event of a spillage.

Typical mitigation measures include storage of the material in a bunded area, with a volume of 110% of the largest single storage container or 25% of the total storage containers whichever is greater, refuelling of vehicles in designated areas that have a protective surface covering and utilisation of drip trays for stationary plant.

For each impact assessed, mitigation measures will be proposed to reduce and / or avoid negative impacts and enhance positive impacts. The mitigation measures identified will be incorporated into the EMPr during the EIA Phase to ensure that they are implemented throughout the lifecycle of the proposed project. The EMPr would become a legally binding document should this project receive EA.

10.CONSLUSION

A number of potentially significant environmental impacts have been identified as requiring some in-depth investigation and the identification of detailed mitigation measures. Although the impact identified are of a potentially significant nature, they would not prohibit the project from continuing at this stage of the process. For this reason, a detailed Environmental Impact Assessment is required to be undertaken in order to provide an assessment of these potential impacts and recommend appropriate mitigation measures, where required.

To date, the following processes have been completed or have commenced:

- A site assessment was undertaken on 20 September 2021;
- The Draft Status Quo Report have been completed;
- The respective specialists were appointed to undertake the respective assessments as indicated within the report;
- The Ecologist and Aquatic Specialist conducted the site investigation between the 6th and the 8th October 2021;
- The Heritage Specialist conducted the site investigation on 9 October 2021;
- The initial public consultation process has been finalised; however, it must be noted that the public participation process is an ongoing process and will continue throughout the duration of the Environmental Impact Assessment.

11.RESOURCES

National Environmental Management Act 107 of 1998 (NEMA 107, 1998)

General Notice Regulation 982, 983, 984 and 985 of 2014 (as amended in 2017)

Mpumalanga Biodiversity Conservation Plan, 2014

National Water Act 36, 1998