

BUSHMAN'S RIVER MOUTH / BOESMANSRIVIERMOND
Ratepayers' Organisation / Belastingbetalersorganisasie (BRRAG)
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S van der Waal
Independent Environmental Consultant
P.O. Box 424
Grahamstown, 6140
Attention: Ms T Rouillard

PROPOSED CONSTRUCTION ON FARM MARSEILLE REM 348 - ISSUES WHICH THE BUSHMANS RIVER RATEPAYERS' ORGANISATION FEEL MUST BE ADDRESSED IN THE BASIC ASSESSMENT PROCESS

Your letter dated 11th August 2017 and the attached Background Information Document (BID) refers. Thank you for keeping us informed of the progress of the proposed development. As an interested and affected Party the Bushmans River Ratepayers' Association would appreciate it if you could ensure that the issues listed below are included in the environmental assessment process and are properly addressed in the draft Basic Assessment Report (BAR). The small sketch plan included in the BID has insufficient detail and we request that the additional information listed below be adequately addressed in the draft BAR so that we can properly assess the impacts of the proposed development and make a positive contribution to the approval process.

ISSUES TO BE ADDRESSED IN THE BASIC ASSESSMENT REPORT

1. Development planning details

- Please provide a detailed description of each of the seven portions of the proposed development and describe what will be constructed in each portion.
- The timing of the three proposed development phases as given in the BID are vague – what factors could affect the timing of the proposed developments in each phase?
- Are there any circumstances which would delay or cancel the development of the second and third phases of the proposed development?
- Details regarding the size and position of the planned open green/recreational spaces should be provided – particularly in the residential area?

2. Proposed filling station

- As the storm water run-off from the proposed development discharges through the residential area of Bushmans River Mouth into the Bushmans River and then onto the beaches in the Addo Nature Reserve how will any spillage or leakage of petroleum products be prevented and what actions will be implemented in the event of any accidental spillages

“We make the difference / Onsmaak die verskil”

Executive Committee: Sheila Swanepoel (Chair), Bill Northrop (Vice Chair),
Gerald Schmidt (Treasurer), Kevin Bates, Jack Dell, Neville Loader, Boet Minnaar, Annabelle
Northrop, Dalien Pachonick, Corrie Swanepoel, John Wesley, Mike White

or leakages that may occur during the construction of the filling station and also during the on-going operation of the filling station.

- What measures/precautions will be implemented to contain any possible future underground leaks from the fuel storage tanks as the water supply for the whole area is obtained from the local underground aquifer.
- Will the filling station be operational 24 hours a day and if so what noise mitigation measures will be implemented?
- Will the filling station include an overnight truck stop and if so what provision will be made for ablution and accommodation facilities for the truck drivers?
- What provision will be made for overnight truck parking areas even if a formal overnight truck stop facilities are not proposed for the filling station? There are no stopping areas along the R72 and trucks will park illegally along the road shoulder if no truck parking areas are provided – this will lead to an increase in accidents along this stretch of the R72.
- How will the various social issues associated with an overnight truck stop situated directly opposite the Marselle residential area be addressed?
- The plan provided with the BID indicates that access to the filling station will be via the existing “Remainder” Road. This raises the following questions which need to be addressed:
 - What provisions will be made to improve the current intersection of “Remainder” Road and the R72 to ensure that the existing traffic along the R72, the traffic turning into and out of Marselle and the increased traffic volumes turning into and out of “Remainder” Road generated by the filling station (and the rest of the proposed commercial and residential development) can be accommodated safely?
 - Will street lighting be provided at the intersection on the R72 to improve the visibility of vehicles exiting the filling station at night.
 - Has the road authority for the R72 (SANRAL) been consulted and have they approved the proposed access and the traffic capacity/safety improvements that will be required at this intersection?
 - Have the future road planning requirements for the R72 been obtained from SANRAL and incorporated into the design of the intersection between the access from the proposed development and the R72?
 - Has the owner of the private “Remainder” Road given his permission for this road to be used to provide access to the proposed service station and commercial development?
 - What provisions will be made to widen the roadway and strengthen the road pavement structure on “Remainder” Road to carry the heavy trucks entering and leaving the filling station? (The existing road is too narrow to accommodate large vehicles travelling/turning in opposite directions and the road pavement structure is not capable of carrying heavy traffic loading.)

3. Proposed commercial development

- Details of the type and size of the proposed commercial buildings must be provided. Will they include retail shopping buildings, restaurant/food outlets, offices and/or industrial premises?
- Will sufficient parking bays be provided in accordance with the legislated town planning requirements?

4. Proposed housing development

- What type of housing units will be provided and how many housing units of each type will be built? Details of building sizes/heights/number of units per individual building are required.
- Details of the approximate selling price of each type of unit should be provided? What economic class are the housing units intended for?
- Will the housing units be sold freehold or under sectional title?
- Will any of the housing units be owned by the Developer and leased to residents?
- How many people are expected to reside in the proposed development and what income brackets are they expected to be in?
- Will sufficient parking bays be provided in accordance with the legislated town planning requirements?
- What recreational spaces/facilities will be provided for the residents use?
- The BID mentions that the development will help to integrate the current Bushmans River Community with the Marselle Township, thereby eliminating the inequalities of the past. Please include an explanation in the BAR of how the type of housing to be built will achieve this proclaimed aim of the development project.
- Will the proposed development help to alleviate the current low/middle income housing shortage in the area?
- What impact will the proposed development have on the value of the existing residential properties in Marselle and Bushmans River Mouth, if any?
- The plan provided with the BID indicates that access to the housing development will be via “Remainder” Road. This raises the following questions which need to be addressed:
 - What provisions will be made to improve the width and surfacing of the existing narrow, gravel “Remainder” Road to ensure that the increased traffic volumes generated by the housing development can be accommodated safely?
 - Has the owner of the private “Remainder” Road given his permission for this road to be used to provide access to the proposed housing development?
 - What will happen to the southern section of the existing “Remainder” Road which connects with Alexandria Road in Bushmans River Mouth? Will it be closed or widened and surfaced to accommodate the increased traffic volumes generated by the housing development?
 - What arrangements have been made with the Municipality with respect to the increased road maintenance costs in Bushmans River Mouth which will result from the increased traffic volumes between the proposed housing development and the Bushmans River Mouth beach and river areas? The two existing roads which will be most affected are Alexandria Road and Main Road; neither of these existing roads are currently in a good condition and they cannot handle any additional traffic loads and the situation will just be worse by the time the housing development takes place. Preliminary road maintenance planning to allow for the effect of the increased traffic must be done with the Municipality so that this potential issue can be adequately addressed before the proposed development is approved.
- What provision will be made by the Developer to increase the current beach and river parking and ablution facilities to cater for all the additional residents of the proposed housing development?

5. Storm water management

- Where will the storm water retention ponds be situated and what flood retention capacity will they have? Unattenuated storm water flows out of the proposed development cannot be permitted as there is already a flooding problem in Bushmans River Mouth due to inadequate drainage facilities through the town. Additional, accelerated storm water run-off from the built and paved over ground within the proposed development will exacerbate the existing flooding problem unless the storm water is adequately attenuated within the development property.
- How will any flood water that is not fully attenuated be drained away from the retention pond overflow spillways? How and where will it be discharged?

6. Sewerage disposal

- How will the water borne sewerage be pumped to the Marselle sewerage works in Riversbend?
- Has the Municipality confirmed that the Marselle sewerage works can handle the additional sewerage flows that will be generated by the proposed development?
- If the sewerage cannot be pumped to the sewerage works where will an on-site sewerage treatment plant be situated within the development?
- Where will the treated effluent be discharged and what measures will be put in place to maintain the on-site sewerage treatment plant and monitor the water quality of the discharge effluent?
- Sewerage conservancy tanks cannot be allowed as the Municipality does not have the capacity to empty them – the Municipality's capacity to handle the existing conservancy tanks in the area is already grossly inadequate.

7. Refuse disposal

- The Municipality's capacity to remove the refuse generated within the proposed development must be confirmed with the Municipality.
- If necessary arrangements must be made for the collection and removal of the refuse to the municipal dumping ground in Port Alfred by a private contractor.

8. Water supply

- The ability of the Albany Coast Water Board to provide sufficient water to the proposed development, without affecting their ability to provide water to the existing communities of Marselle, Riversbend and Bushmans River Mouth, must be confirmed.
- What provisions will be made to collect, store and re-use rain water? This option should be seriously considered as it will reduce the storm water run-off volumes and reduce the demands on the already limited water supply available from the Albany Coast Water Board.

9. Pedestrian safety

- What provisions will be made to ensure the safety of pedestrians from Marselle who will need to cross the R72 to access the commercial development area? If a general shopping area will be established in the commercial area and/or at the filling station a relatively large volume of pedestrian traffic will be generated and a significant proportion of the pedestrians will be children. A safety study to determine if a pedestrian overpass bridge across the R72 should be carried out.
- Has the road authority for the R72 (SANRAL) been consulted and have they approved the proposed pedestrian crossing facilities that will be required across the R72?
- What provision will be made for pedestrians walking along "Remainder" Road, both to the housing development/commercial development/filling station/R72/Marselle/Klipfontein and into Bushmans River Mouth?

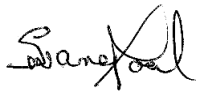
10. Educational facilities

- Will the proposed housing development cater for families with children? If so what consideration has been given to the availability of educational facilities to ensure that the proposed housing development is sustainable?
- Given that the existing primary schools in Marselle, Klipfontein and Kenton on Sea are already over-capacity and cannot accommodate any more children the Department of Education will need to be consulted regarding the future provision of additional school facilities.

The Bushmans River Mouth Ratepayers' Organisation would like to be given the opportunity to comment on the draft BAR before it is finalized and submitted to the Department of Economic Development, Environmental Affairs and Tourism. When you send us a copy of the draft BAR please include any appendices containing additional details which are only summarised in the BAR such as the Traffic Impact Study and the Geo-technical/Ground Water Study.

The approval process will be greatly facilitated if all the above-mentioned issues which are of concern to the Bushmans River Mouth ratepayers can be adequately addressed in the draft BAR.

Yours faithfully,



Sheila Swanepoel
Chairperson
Bushmans River Mouth Ratepayers' Organisation.